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Wiltshire Core Strategy Retail Review

Wiltshire Council

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CONTENTS

1. Introduction 1
2. Wiltshire Retail Hierarchy (Task 1) 4
3. Developing a methodology for the definition of town centres, primary shopping areas, primary and secondary retail frontages 10
4. Town Centre & Non-Town Centre Planning Policies 25
5. Updated Retail Floorspace Capacity Forecasts 54
6. Site Assessments 65
7. Summary and Conclusions 70

Appendices

Appendix 1: Retail hierarchy assessment

Appendix 2: Existing town centre planning policies in Wiltshire

Appendix 3: Use classes order and permitted development rights

Appendix 4: Convenience goods floorspace capacity assessment

Appendix 5: Comparison goods floorspace capacity assessment

Appendix 6: Study area for capacity assessment

Appendix 7: Site assessments

Appendix 8: extract from Bristol site allocations and development management DPD

Appendix 9: extract from LB Ealing development management DPD

Appendix 10: extract from LB Islington development management DPD

Appendix 11: extract from Mid Devon development management DPD

Appendix 12: extract from New Forest sites and development management DPD

Appendix 13: extract from Wokingham managing development delivery DPD

Appendix 14: extract from Teignbridge Local Plan

Appendix 15: Amesbury town centre plans

Appendix 16: Bradford on Avon town centre plans

Appendix 17: Calne town centre plans

Appendix 18: Chippenham town centre plans

Appendix 19: Corsham town centre plans

Appendix 20: Cricklade town centre plans

Appendix 21: Devizes town centre plans

Appendix 22: Downton town centre plans

Appendix 23: Ludgershall town centre plans

Appendix 24: Malmesbury town centre plans

Appendix 25: Market Lavington town centre plans

Appendix 26: Marlborough town centre plans

Appendix 27: Melksham town centre plans

Appendix 28: Mere town centre plans

Appendix 29: Pewsey town centre plans

Appendix 30: Salisbury city centre plans

Appendix 31: Tidworth town centre plans

Appendix 32: Tisbury town centre plans

Appendix 33: Trowbridge town centre plans

Appendix 34: Warminster town centre plans

Appendix 35: Westbury town centre plans

Appendix 36: Wilton town centre plans

Appendix 37: Wootton Bassett town centre plans

1. Introduction

Scope and Purpose

1.1 This report has been prepared by GVA for Wiltshire Council ('WC') following an instruction by WC to prepare a Wiltshire Retail Review ('the Retail Review') which will support a partial review of the Wiltshire Core Strategy ('WCS').

1.2 Following the formation of WC as a unitary authority in 2009, WC has been preparing the WCS that has replaced a number of saved policies within the adopted extant Local Plan and Core Strategy documents across the four former district councils.

1.3 The WCS carries forward a number of town centre boundary definitions from the adopted development plans in Kennet, North Wiltshire, Salisbury/South Wiltshire and West Wiltshire although, in line with the recommendations of the WCS Inspector. it makes a commitment that necessary amendments to these boundaries and corresponding policies will be identified via a Partial Review of the WCS.

1.4 In light of the recommendations of the WCS Inspector and the content of the adopted WCS, this review of retail and main town centre policy issues comprises the following:

- Confirming that the network and hierarchy of centres in Wiltshire is appropriate
- Confirming that the extent of town centres (includes all main town centre uses, offices, bingo halls, theatres, hotels etc) and primary shopping areas to include primary and secondary frontages in designated centres is correctly defined in line with NPPF
- Identifying appropriate policies to make it clear which town centres uses will be permitted in town centres / primary shopping areas across the different centres, this may result in a different policy approach for different centres.
- Identifying a range of suitable sites that are in compliance with NPPF to meet the scale and type of town centre uses needed in the towns of Trowbridge, Chippenham, Corsham, Cricklade, Devizes, Marlborough, Melksham, Tidworth, Warminster and Westbury. Where there is only a small amount of need identified advise with evidence whether this need may be better met in an adjacent centre.

- Advising on the setting of policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres.

1.5 In order to achieve the above objectives, this Retail Review provides a comprehensive review of existing saved retail and town centre policies in Wiltshire to produce a proposed new suite of policies for Wiltshire that is based on sound and up to date evidence and is fully compliant with the NPPF. In particular, this document provides the following evidence base information:

- A justified network and hierarchy of centres across Wiltshire.
- A robust methodology for defining the extent of town centres, primary shopping areas (including primary and secondary frontages) in designated centres
- A map of the extent of the proposed town centres, primary shopping areas (including primary and secondary frontages) using an agreed methodology for all principal settlements, market towns and local service centres.
- A robust and comprehensive evidence base to underpin the development and implementation of detailed planning policies on which town centre uses will be permitted in the town centres / primary / secondary shopping frontages
- A robust and comprehensive evidence base to underpin the development and implementation of detailed planning policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres.
- The allocation of suitable retail sites where additional need is identified.
- Retail policy and town centre policy that will work to deliver competitive town centres and effectively manage their growth over the plan period.

1.6 As part of the Retail Review, a review of the retail floorspace capacity forecasts in the Wiltshire Town Centre and Retail Study[1] ('the 2011 Retail Study') has been undertaken. This review has incorporated up to date population and retail expenditure forecasts,

[1] Published in March 2011

along with an allowance for retail floorspace commitments which have occurred since the completion of the 2011 Retail Study.

Contents of Report

1.7 Having regard to the requirements of the brief issued by WC, the remainder of this document is structured in the following manner:

- Section 2 provides a review of the network and hierarchy of centres across Wiltshire (Task 1);
- In Section 3, a robust methodology for defining the extent of town centres, primary and secondary shopping frontages and primary shopping areas is formulated (Task 2);
- Section 4 provides advice on detailed planning policies on which assess main town centre use proposals within and outside of town centres, primary shopping areas and primary/secondary retail frontages (Tasks 3 & 4);
- Our updated retail floorspace capacity assessment (Task 5) can be found in Section 5;
- Section 6 sets out our assessment of various sites across Wiltshire in terms of their ability to accommodate new retail development and meet, where applicable, the identified need for new retail floorspace (Task 6); and
- Finally, Section 7 draws together the proceeding analysis to provide advice on the recommended planning policy approach for retail and main town centre uses in each of the key settlements across Wiltshire.

1.8 All plans, statistical information and other documentation referred to in the text of this report can be found in appendices at the rear of this document.

2. Wiltshire Retail Hierarchy (Task 1)

Introduction

2.1 This section deals with the retail hierarchy across the county of Wiltshire. Whilst the primary purpose of the Retail Review is to update the town centre boundary definitions and development management policies relating to town centres and retail development outside of the defined centres, WC wishes to take this opportunity to confirm that the proposed retail hierarchy is correct and robust. Indeed, the need to define a resilient network and hierarchy of centres is a key requirement of the National Planning Policy Framework ('NPPF')[2].

2.2 Within the 2011 Retail Study, prepared by GVA for the Council, the following retail hierarchy was proposed:

[2] See paragraph 23 of the NPPF

Table 2.1: Proposed Wiltshire Retail Hierarchy in 2011 Retail Study

Centre	Recommended Position in Retail Hierarchy
Salisbury	Strategic Growth Centre
Trowbridge	Strategic Growth Centre
Chippenham	Strategic Growth Centre
Devizes	Town Centre (Market Town)
Warminster	Town Centre (Market Town)
Marlborough	Town Centre (Market Town)
Melksham	Town Centre (Market Town)
Amesbury	Town Centre (Market Town)
Bradford on Avon	Town Centre (Market Town)
Calne	Town Centre (Market Town)
Corsham	Town Centre (Market Town)
Malmesbury	Town Centre (Market Town)
Westbury	Town Centre (Market Town)
Wootton Bassett	Town Centre (Market Town)
Tidworth	Town Centre (Market Town)
Cricklade	District Centre (Village Centre)
Downton	District Centre (Village Centre)
Ludgershall	District Centre (Village Centre)
Mere	District Centre (Village Centre)
Pewsey	District Centre (Village Centre)
Tisbury	District Centre (Village Centre)
Wilton	District Centre (Village Centre)

Source: Table 9.1 of the 2011 Town Centre and Retail Study (GVA)

2.3 This recommended hierarchy is very similar to the settlement hierarchy in Core Policy 1 of the Wiltshire Core Strategy. The differences are that the Core Strategy considers Tidworth and Ludgershall together as a Market Town and Market Lavington as a Local Service Centre. As can be seen from Table 2.1 above, Tidworth is recommended to be a Market Town whilst Ludgershall is recommended to be a Village Centre, and there is no place for Market Lavington in the recommended retail hierarchy.

2.4 Therefore, there is a need to consider whether the retail hierarchy should match the settlement hierarchy in relation to these centres, whilst also taking the opportunity to re-confirm that the remaining parts of the hierarchy remain correct.

2.5 In order to do this we have conducted an analysis of each of the above settlements using the following data:

- Land use and floorspace data for town centres and out of centre floorspace (including supermarkets and retail warehousing);
- Financial turnover data for food and non-food retail floorspace;
- The national ranking of each centre; and
- The market share of each settlement for food and non-food shopping trips.

2.6 For the larger town centres (mainly the strategic centres and the market towns), land use and floorspace data is provided by Experian GOAD based upon their regular updates for these centres. Data is broken down into the broad land use sectors of convenience, comparison, service and vacant units. For the smaller centres (mainly the village/local service centres), land use and floorspace data has been provided by Wiltshire Council based on their own surveys. Again, data is broken down into land use categories, although floorspace data is only available for convenience and comparison land uses.

2.7 For out of centre floorspace in the strategic centres and market towns, data has been gathered from a number of sources including the Trevor Wood database (for retail warehouses), the updated retail floorspace capacity assessment[3] and planning application data (for supermarkets).

2.8 The turnover and market share data for food and non-food retail floorspace in the main towns is taken from the updated retail floorspace capacity assessment[4].

[3] See Section 5 of this report
[4] See Section X of this report

2.9 Retail rankings data has been taken from the latest version of the Venuescore database, published in July 2014. The Venuescore database ranks town and city centres, along with retail parks, across the country based upon the number and type of retailers present. Due to the size of the centres in Wiltshire, only the strategic centres and the market towns feature in the Venuescore data.

2.10 The results of this analysis are contained at Appendix 1 to this document. The data has been structured to match the recommended hierarchy as set out in the 2011 retail study, along with the inclusion of Market Lavington in the third tier of centres (i.e. local service centres).

2.11 As can be seen from the attached table, the three tiers of centre (strategic centre, market towns and local service centres) are mainly very well defined across all of the datasets and there is generally a clear distinction between the three tiers. There is not any overlap within any of the land use, floorspace, ranking, turnover and market share categories and this leads us to the conclusion that the retail hierarchy proposed in the 2011 retail study remains robust.

2.12 In relation to the issue of Tidworth, Ludgershall and Market Lavington, the attached data suggests the following:

- Tidworth is clearly the smallest of the recommended market towns in terms of retail units although it does not rank the lowest in terms of turnover and market share.
- Ludgershall's data is commensurate with other village/local service centres and the only way in which it could fit into the market town category is if it combined with Tidworth.
- Market Lavington is the smallest of the village/local service centres, although it does appear to have a range of uses which are important and attractive to the local population.

2.13 Looking beyond the data which has been gathered for the attached table, it is useful to look at the relationship of Ludgershall and Tidworth and their respective roles. Tidworth is clearly the main shopping and service focus for both settlements. This is also reflected in the approach advocated by the Core Strategy, with Tidworth expected to be the first choice destination for new retail facilities. Therefore, whilst the amalgamated data associated with Ludgershall and Tidworth would place them firmly into the market town category in the attached assessment, we consider that identifying these centres separately is more appropriate in terms of their respective retail functions. Indeed, we see no conflict with the Core Strategy's settlement hierarchy as the text in that document clearly distinguishes between the roles of the settlements in the context of one wider area functioning together.

2.14 Turning to Market Lavington, whilst it is the smallest of the local service centres surveyed, there is a range of shops and services on offer for the local population. Whilst this concentrates on convenience goods stores and services, these are facilities which serve the local community well and which allow residents to do some of their shopping and service functions locally. Therefore, we consider that there is merit in including Market Lavington as a local service centre in the retail hierarchy.

2.15 We set out our recommendations in Table B below:

Table 2.2: Recommended Wiltshire Retail Hierarchy

Centre	Recommended Position in Retail Hierarchy
Salisbury	Principal Settlement
Trowbridge	Principal Settlement
Chippenham	Principal Settlement
Devizes	Market Town
Warminster	Market Town
Marlborough	Market Town
Melksham	Market Town
Amesbury	Market Town
Bradford on Avon	Market Town
Calne	Market Town
Corsham	Market Town
Malmesbury	Market Town
Westbury	Market Town
Wootton Bassett	Market Town
Tidworth	Market Town
Cricklade	Local Service Centre
Downton	Local Service Centre
Ludgershall	Local Service Centre
Mere	Local Service Centre
Pewsey	Local Service Centre
Tisbury	Local Service Centre
Wilton	Local Service Centre

3. Developing a methodology for the definition of town centres, primary shopping areas, primary and secondary retail frontages

Introduction

3.1 This section deals with the definition of town centre, primary shopping area, primary and secondary retail frontage boundaries in Wiltshire's town centres. The need for this assessment derives from the comments of the Inspector appointed to examine the Core Strategy who, in a letter dated 2nd December 2013, noted:

> *"The Framework requires that plans should, amongst other matters, define the extent of town centres and primary shopping areas based on a clear definition of primary and secondary frontages in designated centres. In this regard, the CS relies upon preceding documents and their saved policies. Due to the various ages of such plans, the approach of the CS is not strong in this regard. The evidence base cannot be considered to be particularly robust with regard to designated frontages and most town centre boundaries.*

3.2 As a consequence, the Wiltshire Retail Review includes an assessment of the various town centre boundaries and this paper examines the potentially different methodologies which could be used to define town centre, primary shopping area, primary and secondary retail frontage boundaries and reaches a conclusion on which methodology should be used by Wiltshire Council in its development plan documents.

3.3 In relation to town centre boundary definitions, the most relevant guidance comes from the National Planning Policy Framework ('NPPF'), with paragraph 23 asking that local planning authorities:

> *"define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations".*

3.4 As a consequence, the remainder of this document is structured in the following manner:

- A review of the various town centre boundary definitions in the NPPF;
- A review of the current town centre boundary definitions in the development plans across Wiltshire; and
- An analysis of the various methodologies which could be used to define town centre, primary shopping area, primary and secondary retail frontage boundaries, followed a recommended preferred methodology for each boundary definition.

National Policy Definitions

3.5 The starting point for this assessment must be the contents of the NPPF. In Annex 2 (Glossary), the following definitions are provided:

- Town centres;
- Primary shopping areas; and
- Primary and secondary retail frontages.

3.6 The NPPF definition of **town centres** is:

> *"Area defined on the local authority's proposal 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 Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres".*

3.7 The definition for primary shopping areas ('PSA') is:

"Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage)".

3.8 For primary and secondary retail frontages, the definitions are:

"Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses".

3.9 The recently published National Planning Practice Guidance ('NPPG') does not provide any further amplification of these definitions.

Existing Development Plan Policies

North Wiltshire

3.10 Within the North Wiltshire Local Plan 2011, **Policy R1** defines primary frontage areas. This is supportive of Class A uses, provided that no more than 5% of the uses in this area are non-A1 uses and that there are no more than any two adjacent units in non-A1 uses.

3.11 **Policy R2** defines secondary frontage areas and is supportive of Class A, D1 and D2 uses and does not place a maximum or minimum threshold on the proportion of any of these uses.

3.12 The North Wiltshire Local Plan does not provide town centre or PSA designations.

West Wiltshire

3.13 Within West Wiltshire, **Policy SP1** of the West Wiltshire District Local Plan First Alternation (2004) defines town centre commercial areas on the proposals map. The text of the policy itself concentrates upon retail development within commercial areas and does not deal with proposals for other land uses in these areas.

3.14 **Policy SP4** defines primary retail frontages on the proposals map and indicates that Class A1 retail uses will be the primary land use in these areas. The policy allows for changes of use from A1 to Classes A2 and A3 only where they do not prejudice the shopping function of the primary retail frontage areas.

3.15 **Policy SP5** deals with secondary retail frontages. These areas are not annotated on the proposal map and the policy explains that they are those areas in the town centre commercial areas which are not primary retail frontage areas. SP5 allows for unconditional changes of use from A1, to A2 and A3 uses, and other uses are allowed on the condition that they maintain the primary commercial function of the town centre commercial area.

Kennet

3.16 Within the Kennet District Local Plan (2004), there are a number of policies which deal with town centre boundaries. **Policy ED17** defines 'town centre' boundaries in Devizes and Marlborough and **Policy ED24** defined 'service centre' boundaries in Ludgershall, Market Lavington, Pewsey and Tidworth. **Policy ED20** promotes retail development in Devizes town centre, although there is no comparable policy for Marlborough.

3.17 For the two 'town centres', prime shopping areas are defined under **Policy ED18**. This policy notes that permission will not be given to changes of use other than Class A1 unless inter alia the proposed use makes a positive contribution to the centre.

3.18 **Policy ED19** deals with proposals outside of the prime shopping areas but within the town centre boundaries. It notes that changes of use to non-A1 uses will be allowed subject to *inter alia* it not providing a major break in the existing commercial frontage and it providing activities that will enhance the vitality and viability of the centre. A 'major break in the existing commercial frontage' is not defined by the policy and supporting text.

3.19 Within the 'service centres' defined by Policy ED24, there are not any prime retail area definitions.

Salisbury District

3.20 Within Salisbury District, the adopted Local Plan defines:

- City centre boundary;
- Central shopping area;

- Prime shopping frontage; and
- Secondary shopping area[5].

3.21 For Amesbury town centre there are prime shopping frontage and secondary shopping area designations, but no central shopping area and town centre boundary designations.

3.22 **Policy S1** of the Local Plan controls changes of use in the prime shopping frontages in Salisbury and Amesbury. Changes of use from A1 to A2 and A3 are permitted provided that certain criteria are met (including location and size of the premises and the distribution of A1 and non-A1 uses). The supporting text to the policy notes that the aim of the LPA is to keep 60% of each section[6] of primary frontage in A1 use.

3.23 **Policy S2** deals with secondary shopping areas and allows for changes of use to A2 and A3 use where specific criteria are met. The criteria are, in some cases, less onerous than Policy S1 although the supporting text does indicate that at least one third of the units in a particular block, or frontage of 50 metres either side of the application site, should remain in Class A1 use.

3.24 **Policy S3** repeats the support shown by policies S1 and S2 for A1, A2 and A3 uses in the central shopping areas of Salisbury and Amesbury but for new development rather than changes of use.

3.25 There is no policy associated with the city centre boundary designation in Salisbury and no town centre boundary designation in Amesbury. In addition, there is a primary shopping area designation in either centre.

Assessment

3.26 Given that the town centre boundary definition relies in part on the PSA definition and, similarly, the PSA definition relies upon the retail frontage definitions, we deal with the above definitions in reverse order below.

[5] Which is the same as the central shopping area boundary
[6] A section is defined as a particular street block frontage or frontage of 50 metres either side of the application site, which is less.

Primary and secondary retail frontages

3.27 As a starting point it is important to note that both of these definitions use the word 'retail' in their title. It is also important to note that both definitions should be read together otherwise, in our opinion, there is the potential for an incorrect interpretation. For example, the primary frontages definition simply makes reference to 'retail uses' and includes reference to food, drinks, clothing and household goods. There is no attempt to distinguish between different use classes and the use of the words 'food' and 'drinks' gives the *prima facie* impression of café and restaurant uses. However, the definition for secondary frontages includes reference to 'restaurants' which instead suggests that uses in Classes A3, A4 and A5 may be more appropriately related to secondary retail areas.

3.28 It is also worth noting that whilst the word 'retail' is used in the title of these definitions, the secondary frontage definition includes reference to 'cinemas' and ' businesses' which do not fall into the Class A retail land use category. Therefore, the definition of these areas must have an element of flexibility with, in our opinion, retail being part of the land use mix and not the sole land use.

3.29 This observation leads usefully on to the potential methodologies for defining primary and secondary retail frontages. For **primary frontages**, the key parts of the NPPF definition are 'high proportion of retail uses' and 'which may include food, drink, clothing and household goods'. Therefore, we consider that the methodology options are:

a) Categorize 'retail uses' in this context as Class A1 uses; or

b) Alternatively, assume that a wider selection of Class A uses are included.

3.30 Historically, across the country and in Wiltshire, the definition of 'retail' uses for primary retail frontages has been Class A1 retail uses. The alternative being tested here is for the definition to be widened to include other A2, A3, A4 and A5 uses. This alternative would allow large parts of town centres to be covered by primary retail frontages designations and remove any particular focus on A1 retail uses. A further consequence would be that the primary frontage designations would be more in line with the NPPF's secondary frontage definition. Therefore, for all of these reasons, the use of 'retail' in the context of primary retail frontages should be Class A1 retailing.

3.31 We then move on to consider the following options for the definition of 'high proportion of retail uses'. These options are informed by the current development plan policies across the various Local Plans in Wiltshire. Whilst these policies are development management tools, they set out the requirement for how each primary frontage area should look and, we assume, must have played a part in the original definition of the primary retail areas in each administrative area:

- Salisbury Local Plan: at least 60% of primary frontage area to be in A1 use.
- West Wiltshire Local Plan: no threshold set; instead a reliance on judgement and the circumstances of each case.
- Kennet Local Plan: no threshold set; instead a reliance on judgement and the circumstances of each case (although it is unclear whether the Kennet policy is a 'frontage' policy or a 'shopping area' policy).
- North Wiltshire Local Plan: no more than 5% of uses can be non-A1 uses and no more than two adjacent units in non-A1 use.

3.32 These contrasting approaches provide a useful basis for our options assessment:

a) Classify a high proportion as an area with 95% of the agreed type of retail uses; or

b) Classify a high proportion as an area with over 60% of the agreed type of retail uses; or

c) Rather than setting a specific threshold, define the area with reference to the actual distribution and layout of land uses in each town centre.

3.33 **Option (a)** defines primary frontages on the basis of at least 95% Class A1 uses and for there to be no more than two non-A1 uses together. This is the approach adopted in the North Wiltshire Local Plan and leads, in a number of instances, to small primary retail frontage areas. This is simply a product of applying this 95% rule to designating the boundaries. When the latest land use data is studied, three immediate issues arise in relation to this approach.

3.34 First, many of the current primary frontage areas cannot meet the 95% rule. Calne, Corsham and Malmesbury have non-A1 uses well in excess of the policy threshold and any attempt to re-draw the primary frontage boundary for these centres is likely to lead to either smaller defined frontage areas and/or boundaries which do not look and feel logical and robust when viewed from the street.

3.35 Second, there are, in some instances, collections of A1 retail uses outside of the current primary frontage boundary which cannot be included due to the 95% rule and yet they act as part of the primary retail frontage area.

3.36 Third, in a number of instances, there are more than two consecutive non-A1 uses within defined primary frontage areas. Under option (a) this would remove these areas from the primary frontage even though they are obviously within the core retail area of these town centres.

3.37 Overall, we consider that there are number of drawbacks to option (a). The use of such a high percentage of A1 uses, along with a rule of no more than two consecutive non-A1 uses, creates a number of difficulties in defining a sensible and realistic primary retail frontage area.

3.38 **Option (b)** is a subtle variation on Policy S1 of the Salisbury District Local Plan. Policy S1 requires at least 60% of uses in each street block (or every 100 metres) to be in A1 use. We have varied this for our options analysis to be 60% in the whole of the defined primary frontage area. This is therefore a relaxation of the 95% rule in option (a) and the rule which ensures that there is not more than two consecutive non-A1 uses is dropped for the purposes of this option.

3.39 The immediate observation on this option is that it will allow for a much wider area to be covered by the primary frontage designation, as there is much less of a constraint on the number and spacing of non-A1 uses. This allows the primary retail frontage to exist alongside small pockets at non-A1 uses which do not affect the main retail function of the area. Indeed, the threshold is set so low that it is likely that whilst all of the main groupings of A1 retail uses will be covered under this approach, there may be an unintended consequence of areas which are not genuinely part of the primary retail frontage being included. This would lead to an erosion in the secondary retail frontages area and a 60% definition may, in some circumstances, be closer to the primary shopping area definition.

3.40 Furthermore, we have a concern that a 60% A1 use rule may not be an appropriate rule for all centres. There may well be some centres where a, for example, a 60%

minimum threshold is an optimum size, and this may have been the reason for choosing this figure for Salisbury. However, the same figure may be inappropriate for other centres across Wiltshire. In other words, we are concerned that a one size fits all approach may not work to the benefit of Wiltshire's town centres. Indeed, and in a similar manner to the 95% rule, in order to reach the target threshold of 60% the shape and extent of defined frontages may lead to contrived areas that are illogical in shape.

3.41 The final option, **option (c)**, approach the issue from the other direction. Rather than setting a standard minimum threshold for A1 uses and, potentially, rules on the spacing of A1 and non-A1 uses, option (c) seeks to define a primary retail frontage area on the basis of the actual distribution of A1 and non-A1 uses in each town centre. In this option there is not one guiding principle and instead a basket of subjective indicators are used, including:

- Does the streets/areas under consideration consistently have a large majority of A1 retail uses?
- Are there national multiple retailers present?
- Where non-A1 uses appear, do they remain in the small in number and scale and subservient to the role of A1 uses?
- Where a street has a clear majority of A1 uses, but not necessarily a large majority, does it retain a shopping character and does it have easy and seamless links to the more dominant adjacent retail frontages?

3.42 Where the answer to the above questions is 'yes', it is likely, but not necessarily certain, that it should part of the primary retail frontage. In each case, the judgement should be made with reference to up to date land use data and a clear picture of the 'on the ground circumstances' for each centre.

3.43 Clearly, a characteristic of this approach is to use judgement rather than a standard rule or formulae. Therefore, a clear justification will need to be provided for each centre. Therefore, town centre use data together with site visits was used to determine the extent of the boundary using the criteria described in paragraph 3.41. Indeed, once the primary retail frontage has been defined using this method then a calculation can be made to determine the balance between A1 and non-A1 uses and how this may be used in development management policies by the Council.

3.44 Turning now to secondary frontages, it is useful to return to the existing development plan policies as a starting point:

- Salisbury District: secondary frontages are reflective of the existing concentration of shopping facilities, but where a range of land uses can be recognized. At least one third of premises will be in A1 use.
- West Wiltshire: retail and service uses, plus activities important to town centre commercial areas, including different and complementary uses during the day and in the evening. No threshold set for A1 or any other use classes.
- Kennet: no policy or definition available.
- North Wiltshire: secondary areas promoted for retail, leisure, office and community uses, on the condition that the vitality and viability of the centre is maintained.

3.45 Alongside these existing approaches, the NPPF notes that secondary areas offer greater opportunities for diversity including restaurants, cinemas and businesses, and we reiterate that this is the context of a secondary retail frontage definition in the NPPF.

3.46 Therefore, in light of the above, we consider the options for testing secondary retail frontages should be:

a) Allow for a greater diversity of retail and other uses, but retain a minimum proportionate threshold for Class A1 uses; or

b) Allow for a greater diversity of retail and other main town centre uses and, rather than set a minimum threshold for A1 uses), place the frontage boundary at the outer edge of the Class A retail land use area (i.e. once Class A uses substantially stop occurring define this at the outer edge of the secondary frontage area); or

c) Allow for a great diversity of retail and other main town centre uses and include the area covered by all main town centre uses whether they are retail uses or not.

3.47 Adoption of **option (a)** will certainly retain retail uses as a significant land use in the secondary frontage area and possibly the, or one of the, dominant land use(s). Therefore, this option will certainly retain a strong retail-related feel to the defined area.

However, the consequence of needing to maintain a minimum of 30% Class A1 retail units is that some A1 retail units could well be left out of the secondary frontage where they are the in minority amongst other main town centre uses. In our opinion, this has the potential to exclude retail uses from an area which they would otherwise naturally form part of, and lead to a second-class retail area in Wiltshire's town centre.

3.48 **Option (b)** prevents this outcome by removing the minimum threshold by allowing all of those Class A1 retail uses which naturally form part of the retail shopping area to be included in the secondary frontages. This option also allows the boundary to stop once retail uses have become sparse and thus remain true to the definition of this being a secondary retail frontage.

3.49 **Option (c)** allows the secondary frontage to look wider and include all main town centre uses and not be reliant on Class A retail uses. In our opinion, this option is likely to go well become the intentions for the NPPF definition and instead trespass on the 'town centre' boundary definition provided by the NPPF. Whilst it is likely that in some instances a secondary retail area boundary will match a town centre boundary in some of the smaller centres, this will not happen in every case and therefore the methodology adopted by the Council should allow for distinctions to occur.

3.50 Therefore, in light of the above analysis we consider that option (b) should be adopted for the secondary retail frontage areas.

Primary Shopping Areas

3.51 The NPPF definition for PSAs is: a defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

3.52 This definition is very clear and constrains the possibilities for alternative methodologies. In particular, it is clear from the NPPF definition that primary retail frontages must form part of the PSA. It is also clear from the NPPF definition that only a certain type of secondary frontages will be capable of being included in the defined PSA.

3.53 Therefore, we consider that there are only two potential options to test for this definition:

a) Include all of the primary frontage area plus part or all of the secondary frontage area, based on a bespoke assessment of each centre; or

b) Include all of the primary frontage area plus all of the secondary frontage area in all circumstances (assuming option (b) for the secondary frontages is chosen).

3.54 For **option (a)**, a bespoke assessment for each centre is required, which highlights those parts of the defined secondary frontages which adjoin and are closely related to the primary frontages. This will examine the physical relationship of the two sets of frontages, including whether:

a) there is a seamless physical relationship between part or all of the two frontages, or whether there is physical separation (via roads or non-town centre uses);

b) there is a distinct change in the retail character in the secondary area which prompts a distinction to be made.

3.55 For **option (b)**, the working assumption is that, as the secondary retail frontage is defined on the basis that it contains a reasonable amount of retail uses, it must automatically form part of the wider primary shopping area. Whilst this may be the case for certain centres, this cannot be guaranteed for all centres and such an approach has the potential to ignore local circumstances.

3.56 In addition, the PSA boundary is an important boundary for the purposes of applying the sequential approach to site selection and, in particular, classifying in-centre, edge of centre and out of centre locations. Therefore, it will be important to ensure that the definition of the PSA boundary allows for sensible in-centre, edge of centre and out of centre classifications. If it is assumed that all secondary frontages are part of the PSA then there is the potential for an over-optimistic classification of sites (i.e. sites which are separated from the core retail area of a town centre are classified as 'town centre' when in actual fact they are 'edge of centre'. Similarly, out of centre sites are incorrectly elevated to edge of centre status)

3.57 Therefore, we consider that option (a) is to be preferred as it allows the local circumstances of each centre to be taken into account. In particular it allows for a distinction to be made between a retail area which contains a varied and valuable mix of uses which contribute to town centre health and attractiveness but which are not dominated by A1 uses and those areas where A1 retailing remains the most important use.

Town Centre Boundaries

3.58 The NPPF defines a town centre as including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. Annex 2 of the NPPF defines main town centre uses as:

> *"Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, 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)".*

3.59 Once the PSA boundary has been set, we consider that the options for the approach to defining town centre boundaries are as follows:

a) Assume that the town centre boundary will be no larger than the primary and secondary retail frontage boundaries and therefore a new boundary definition is not provided; or

b) Assume that the town centre boundary will always be larger/different than the primary and secondary frontage and primary shopping area boundaries and, therefore, provide a new distinct separate boundary in all instances; or

c) Assume neither of the above and undertake a bespoke assessment to understand whether the secondary frontage boundary is robust or whether a separate boundary is required.

3.60 The rationale for testing options (a) and (b) is based on the difference circumstances across Wiltshire's town centres. Neither option is considered unreasonable or illogical in principle as there will be some centres whose secondary retail frontage include all of the main town centre uses outlined above. These centres are likely to be smaller centres which do not possess uses such as offices and leisure/art/cultural facilities.

3.61 In contrast, some of the larger centres, such as Trowbridge, Chippenham and Salisbury will have office, leisure and cultural facilities which are outside of the main retail area. Examples of this could be the Council's offices in Trowbridge and Chippenham.

3.62 Therefore, a one-size-fits-all approach cannot be applied to town centre boundaries in Wiltshire and a bespoke assessment should be undertaken for each centre. Moreover, even where the town centre boundary is demonstrated (based upon our recommended approach) to match the secondary frontages area, a town centre boundary definition must still be shown in order to respond to paragraph 23 of the NPPF.

Should all four boundaries be applied to all centres in Wiltshire?

3.63 The final matter for consideration is whether all four definitions (primary frontage, secondary frontage, PSA and town centre boundary) should apply to all centres across Wiltshire.

3.64 Notwithstanding differences between the four former districts, some existing development plans do differ in approach between centres in the same district in two important respects. First, in North Wiltshire, Cricklade does not have a primary retail frontage which is different to the other main town centres. Second, in Kennet, Ludgershall and Tidworth have service centre boundaries in contrast to the prime shopping area and town centre boundaries in Marlborough and Devizes.

3.65 In relation to the differences found in the North Wiltshire Local Plan (i.e. lack of primary retail frontage in some centres) we consider that this remains a reasonable and justifiable approach in certain circumstances. In some of the smaller centres in Wiltshire there will not be any discernible distinction across the town centre/primary shopping area in terms of Class A1 retail, Class A retail and other uses. Therefore, it would be illogical to try and artificially create a distinction and it would be a more appropriate alternative to provide a blanket PSA definition instead.

3.66 In relation to the second issue, we would recommend the removal of any distinction between town centres and service centres as set out in the Kennet Local Plan. All centres should have consistent definitions and we recommend the following:

a) All centres should possess town centre and PSA definitions, as these are crucial to the operation of the sequential approach to site selection and general town centre policies.

b) Where it is justified, the larger centres will provide separate primary and secondary retail frontages. These will then be complemented by PSA and town centre boundaries.

Proposed town centre boundary definitions

3.67 Based upon the methodology proposed in this section, we have defined a set of town centre, primary shopping area, primary shopping frontage and secondary shopping frontage boundaries for the town centres across Wiltshire. These can be found in appendices to this report.

4. Town Centre & Non-Town Centre Planning Policies

Introduction

4.1 This paper has been prepared by GVA for Wiltshire Council ('WC') as part of the Wiltshire Retail Review and deals with the options for planning policies in the Wiltshire Core Strategy which will deal with development proposals for main town centre uses within and outside of defined town centres.

4.2 Following the definition of various town centre boundary definitions in Task 2 of the Retail Review, it is now necessary to assess the available options for policies for the following:

- Primary retail frontages
- Secondary retail frontages
- Primary shopping areas
- Town centre boundaries
- Proposals outside of the above boundaries

National Policy Definitions

4.3 A useful starting point for the preparation of policies which deal with proposals for main town centre uses within and outside of the various boundary definitions is the National Planning Policy Framework ('NPPF'). Paragraph 23 of the NPPF notes that local planning authorities should:

> *"define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations"*

and

"set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres"

4.4 In addition, when discussing the impact test, paragraph 26 of the NPPF makes it clear that local planning authorities have the opportunity to set a local threshold for the scale of retail, leisure and office development proposals which should be supported by an impact assessment.

Existing Development Plan Policies

4.5 The various development plan documents covering the former Districts across Wiltshire contain a variety of policies dealing with development proposals within and outside of the various town centre boundary definitions. Whilst it is the purpose of this document to consider the content of new policies to assess future development proposals, consideration of existing policies can help to set the context for the options assessment. A summary of the salient development plan policies is contained at Appendix 2.

Other Influencing Factors

4.6 The expansion of Permitted Development ('PD') rights around retail and other main town centre uses which has taken place in the current Parliament has added an additional layer of complexity which should be taken into account when surveying the available policy options for town centre uses.

4.7 Briefly, the changes to PD rights include:

- In May 2013, a 3 year amendment to the GDPO allowed for office to residential conversions (subject to a prior approval process and certain exemptions, e.g. listed buildings). In addition, a two year provision allowing for a wide range of flexible permitted development rights was also introduced in order to promote flexibility and revive high streets and town centres. This covered changes between the following uses (subject to a prior approval process and the area of floorspace changing use being less than 150sqm).

Current Use	Permitted changes
A1, A2, A3, A4, A5, B1, D1, D2	A1, A2, A3 or B1 for a period of two years, with change possible at any point in the 2 year period

- In April 2014, further permitted development rights were introduced which allow for buildings up to 150sqm in A1 or A2 use to be converted for residential use (C3) (subject to a prior approval process which includes the ability of the Local Authority to consider whether any such change would create inadequate provision of A1/A2 uses and in key shopping areas, impact on the sustainability of that shopping area). In addition, permitted changes from A1 to A2 uses classed as 'deposit takers' or 'essential financial services' (banks, building societies, credit unions and friendly societies falling under a new use Class 'CA') were also introduced.

4.8 It is worth expanding on the requirements of the prior approval process for the flexible uses outlined above, as well as the issue of timeframes around which the flexible uses can be enacted. Firstly, through the prior approval process, the applicant must notify the LPA of the date the site will begin its period of flexible use and specify what use will be undertaken. That specified use can be changed to another permitted use subject to completion of a further prior approval process notification. Therefore, in terms of timeframes, a single continuous flexible use period can commence at any point up until the revocation of the flexible permitted rights in May 2015. As such, a new flexible use could enter into a unit in April 2015 and still be afforded the permitted rights until April 2017.

4.9 It is also worth noting that buildings where permitted development rights have been exercised retain the last lawful use class and will be required to revert back to that use when the permitted flexible period of use ends.

4.10 A full schedule outlining all of the current permitted changes as of January 2015 is contained in Appendix 3.

4.11 Whilst this represents the current situation, it is however important to note that the situation is likely to change in the near future. Further changes to the GDPO have been mooted by the current Government as early as March 2015 covering:

- New office to residential permitted development rights with a stricter Prior Approval Process to replace the current rights which are scheduled to end in May 2016.
- A revised and wider A1 Use Class will be created which incorporates the majority of financial and professional services currently within Use Class A2. Betting shops and pay day loan shops would not form part of the wider A1 retail use class and would remain within A2.
- Changes of use from existing A1 and A2 use classes, and some sui generis uses (if in such use at the time of the Autumn Statement 2013) to A3 and change of use from A1, A2 and some sui generis uses (again, if in that use at the time of the Autumn Statement 2013) to D2.
- Permitted Development rights which will allow extensions and amendments to existing premises and internal mezzanine floors larger than 200sqm.

4.12 However, with the General Election taking place in May 2015 and an uncertain result predicted it is unclear whether this programme will be implemented and any new Government may seek to impose its own set of reforms which could again significantly change the retail/town centre planning policy landscape. As such, it is evident that it is more important than ever to consider the impact such high-level policy changes could have on any future retail policy strategy in order to avoid the effect of local policies being nullified.

Assessment

4.13 The first set of options to consider are whether the existing development management policies in the various development plan documents can and/or should remain, or whether a new approach to these policies should be pursued. As can be seen from the review of the adopted Local Plans at Appendix 3, there are different types of policies dependent on the retail boundary designations on the various policies maps. The earlier part of this review has proposed a consistent methodology for redrawing retail and town centre boundary designations across Wiltshire's towns. Likewise, there is a need to have some consistency between the in-centre and out of centre policies that will form part of the development plan.

4.14 It is clear that, due to the changing nature of some of the town centre boundary designations, retaining the existing adopted Local Plan policies is not a realistic option. Instead, the policies will need to be recast in order to reflect the new designations.

4.15 In light of our recommendations for the previous task, the in-centre and out of centre policies must cover the policy options for the proposed primary retail frontages, secondary retail frontages, primary shopping area and town centre boundaries.

4.16 Moving on to the options for the policies specifically related to these designations, we consider that there are three to consider:

- first, whether each designation needs its own policy;
- second, the wording of the policies themselves; and
- third, whether the same wording should apply across all settlements or whether there should be variation between centres.

4.17 In relation to the need for a policy for each designation, we have recommended that each centre possesses a primary shopping area boundary and a town centre boundary as a minimum. In some instances, the primary shopping area and the town centre may well cover the same area and this is shown on the recommended boundaries. In relation to primary and secondary retail frontages, we have recommended that not all centres across Wiltshire require these designations, with only the larger centres deemed to be suitable.

Primary and secondary retail frontages

4.18 In relation to the primary and secondary retail frontages, we consider that the only sensible option is for specific policies to accompany these separate designations. To do otherwise would render the need for these separate designations irrelevant. Moreover, given the comments made in the previous section, each designation has specific characteristics and therefore requires either separate policy or separate sections within one wider policy.

4.19 In our opinion, our previous assessment of how to designate primary and secondary frontages should also be used to guide the content and structure of the policies which manage development in these areas. Indeed, the options set out at paragraphs 33[7] and 47[8] of Section 3 are broadly salient to the options for the content of the policies themselves. In other words, the choice of option for defining the policy boundary should dictate the choice of option for the content of the policy. For the **primary retail frontages**, we recommended that, out of the three available options, option c should be pursued (i.e. set a qualitative rather than a quantitative guide) and it is therefore sensible for the indicators listed at paragraph XXX in the previous section[9] used to also be used to guide the wording of the policy itself and its supporting text. An alternative option, which provides a policy that focuses upon a quantitative approach (i.e. setting minimum or maximum thresholds for Class A1 or non-Class A1 floorspace), would be inconsistent and potentially unworkable.

4.20 In relation to the actual wording of the primary frontage policy, and leaving aside the quantitative thresholds which were outlined in previous Local Plan policies, the adopted Local Plans provide the following criteria/indicators for consideration:

1) The location and prominence of the premises
2) The size and width of the premises
3) The number and distribution of other non-A1 uses
4) The nature and character of the proposed use
5) Impact on environmental and residential amenity

[7] Options for the primary retail frontages included: (a) Classify a high proportion as an area with 95% of the agreed type of retail uses; or (b) Classify a high proportion as an area with over 60% of the agreed type of retail uses; or (c) Rather than setting a specific threshold, define the area with reference to the actual distribution and layout of land uses in each town centre.

[8] Options for the secondary retail frontages included: (a) Allow for a greater diversity of retail and other uses, but retain a minimum proportionate threshold for Class A1 uses; or (b) Allow for a greater diversity of retail and other main town centre uses and, rather than set a minimum threshold for A1 uses), place the frontage boundary at the outer edge of the Class A retail land use area (i.e. once Class A uses substantially stop occurring define this at the outer edge of the secondary frontage area); or (c) Allow for a great diversity of retail and other main town centre uses and include the area covered by all main town centre uses whether they are retail uses or not.

[9] Does the streets/areas under consideration consistently have a large majority of A1 retail uses? Are there national multiple retailers present? Where non-A1 uses appear, do they remain in the small in number and scale and subservient to the role of A1 uses? Where a street has a clear majority of A1 uses, but not necessarily a large majority, does it retain a shopping character and does it have easy and seamless links to the more dominant adjacent retail frontages?

6) The nature of the shop-front
7) Impact on the shopping function
8) Impact on the vitality and viability of the town centre
9) The quality of the existing building, including any positive contribution to Conservation Areas and/or the ability of a proposal to retain and enhance a listed building
10) Effect on the use of, and access to, upper floors

4.21 These criteria cover a relatively wide range of issues (and in some cases, overlap), some of which touch upon the quantity of uses (i.e. size and width; number and distribution), whilst others are very much qualitative in nature (i.e. nature of the shop front, nature and character of the proposed use).

4.22 Whilst the criteria within existing Local Plan policies cover a wide range, we have also undertaken a review of other development management plan documents which have been examined and adopted after the publication of the NPPF. We have deliberately chosen a range of adopted policies, some of which do, and some of which don't, refer to quantitative thresholds alongside qualitative assessment indicators. The local planning authorities which have been chosen[10] are:

- Bristol;
- London Borough of Ealing;
- London Borough of Islington;
- Mid Devon;
- Wokingham;
- New Forest; and
- Teignbridge.

[10] This should not be seen as an exhaustive list of development plans containing town centre development management policies and examined/adopted after the publication of the NPPF. Instead, it should be seen as a cross-section of plans from across the South of England.

4.23 The relevant policies from these plans are contained in appendices to this document (with specific references provided below):

- **Bristol (Appendix 8):** Policy DM8 of Bristol's 'Site Allocations and Development Management Policies' plan[11] aims to retain the use of existing shops (Class A1) in primary shopping areas[12]. No quantitative threshold is provided regarding the proportion of Class A1 uses in the primary area. Instead, the primary area policy is concerned with the loss of existing A1 uses and stops such losses unless a series of criteria are all met. These criteria are: the need to make a positive contribution to the vitality, viability and diversity of the primary shopping area; the need to avoid creating a significant break in the shopping frontage; and, the need for compatibility with a retail area, including a shop-front display and accessibility from the street. The supporting text[13] to the Policy provides some further guidance as to how to apply the policy, including the definition and assessment of a 'significant break'.
- **Ealing (Appendix 9):** within Ealing's Development Management Plan, there are no qualitative criteria for the assessment of changes of use within the primary retail frontage areas. Instead, there is a blanket requirement for 100% of the designated frontage to be in Class A1 use. This is, or course, extremely restrictive and does not allow consideration of any special circumstances.
- **Islington (Appendix 10):** Part A of Policy DM4.5 of Islington's Development Management Policies Plan provides guidance for proposals for changes of use of existing (Class A1) retail premises. A minimum threshold, for the whole of the frontage, is set, along with other criteria relating to: the break in retail frontages (of not more than one unit); the period of vacancy and marketing of the property; the effect of the retail function and viability/vitality of the centre; and, the level of activity in the proposed use.

[11] Adopted in July 2014
[12] There is no separate primary shopping frontage policy in Bristol to the PSA boundary. However, it is reasonable to assume that the PSA boundary in Bristol is broadly equivalent to the primary retail frontage due to the more restrictive nature of the PSA element policy than the secondary frontage element of policy in DM6.
[13] See paragraph 2.8.5

- **Mid Devon (Appendix 11)**: within Mid Devon's Development Management Policies Plan[14], Policy DM16 deals with development and change of use proposals in the defined primary shopping areas of the main centres of Crediton and Tiverton. The proposals map defines primary shopping areas and primary shopping frontages (the latter of which is smaller than the former)[15], although the text of DM16 (and the supporting text) sets a minimum threshold of 65% of A1 uses within the primary shopping frontages and then provides a range of qualitative criterion which should be applied to proposals within the wider primary shopping area boundary. This suggests that whilst there is flexibility in the determination of proposals in the wider primary shopping area boundary (outside of the primary frontages) there is no room for flexibility in the consideration of proposals which lead to a drop in the proportion of A1 uses below the 65% minimum threshold. Within the policy itself, three qualitative criteria are provided: effect on (and fragmentation of) the PSA's primary retail role and character; potential harm to the vitality and viability of the PSA; and, effect on visual character and amenity. In addition, paragraph 3.4 of the supporting text provided further helpful guidance on the assessment of proposals against the three criteria in the policy.
- **New Forest (Appendix 12)**: Policy DM14 of the adopted New Forest Sites and Development Management Plan is specific to proposals in the designed primary shopping frontages. The policy encourages retail development and allows for non-A1 uses up to a maximum of 30%[16]. The text of the Policy also allows for exceptions to be made to the 30% threshold where two criteria are met: the proposed use will add to the vitality and attractiveness of the area and it can be demonstrated that the proposal will generate customer footfall levels similar to a typical retail unit.
- **Wokingham (Appendix 13)**: Policy TB15 of Wokingham's 'Managing Development Delivery Document'[17] provides an all-encompassing policy for proposals in different parts of the Borough's town centres. For the proposals within the defined primary shopping frontages, guidance is limited to part 3(b) which requires that proposals should retain or increase the provision of A1 shops in the primary frontages. No

[14] Adopted 2013
[15] Which suggests general compliance with the NPPF
[16] Taking into account unimplemented planning permissions
[17] Adopted February 2014

minimum proportion for any of these uses is set by the policy, although parts (a), (c) and (d) of the policy require a demonstration that proposals: are of a scale and form that is compatible with the centre and the retail hierarchy; they contribute to the provision of day/evening/night-time uses and are compatible with other uses; and, they enhance vitality and viability. However, it is unclear from Policy TB15 whether, whatever the current proportion of Class A1 uses in a particular town centre, the current proportion is to be the minimum for the purposes of Policy TB15.

- **Teignbridge (Appendix 14)**: the final Plan subject to our review is the Teignbridge Local Plan[18]. Policy EC7 deals specifically with the defined primary shopping frontages and notes that development will not be permitted which would lead to less than 70% of the frontages being in A1 use, create three or more adjoining ground floor non-A1 units or lead to a change in an existing active ground floor frontage to non active use. This approach suggests that whilst there is some flexibility in the length of non-A1 frontages, and that this could rely on some 'qualitative' considerations, the 70% minimum proportion for A1 uses is a rigid and inflexible requirement.

4.24 It is clear from the policies adopted by other local planning authorities that a range of approaches have been adopted. Some have adopted a solely quantitative threshold policy, some have allowed their quantitative threshold to be influenced by qualitative-type criteria, whilst others are based on purely qualitative considerations. Based upon our recommendations in Task 2, a qualitative based approach is recommended for Wiltshire and there is a need to consider whether there are any similarities between the criteria used by other LPAs and the current policies across Wiltshire.

4.25 In terms of the similarities between the existing Plans in Wiltshire and those other LPA Plans which adopt qualitative criteria, consistent themes are: the need to protect the retail function and the vitality and viability of centres, the need to avoid fragmentation of retail frontages and the need to provide active frontages. In addition, there are also quantitative criteria which plans, such as in Mid Devon, have translated into qualitative considerations. For example, rather than setting a rigid threshold for the number of

[18] Adopted May 2014.

non-A1 uses, either as adjacent properties or throughout the defined frontage, allow the decision maker to consider the facts in each particular case. Also, the Islington Plan also introduces a criterion which examines the length of vacancy of the unit and the evidence of marketing for the permitted use which can, in our view, assist in a review of the potential for longer-term vacancies in a centre.

4.26 Based upon the above review, we consider that there are parts of the development management policies in Wiltshire's existing Plans which remain relevant and robust, particularly in terms of comparisons with recently adopted other post-NPPF development management plans elsewhere. Therefore, we recommend that the wording of the primary retail frontage policy should be as follows:

Within the primary retail frontages identified on the proposals map, the change of use of ground floor Class A1 shop premises to Class A2, A3, A4 and A5 will only be permitted where the proposed use would not undermine the retail function of the town centre and maintain and enhance its vitality and viability. The determination of each application will have regard to the following factors:

- ***The location and prominence of the premises;***
- ***The size and width of the premises;***
- ***The number and distribution of other existing and committed non-A1 uses within the defined primary retail frontage (including any premises subject to current Permitted Development changes of use);***
- ***Where applicable, the length of vacancy of the premises and evidence of marketing for the current permitted use;***
- ***The nature and character of the proposed use; and***
- ***The design of the shop-front.***

4.27 It will be noted that we have included reference to Permitted Development in the recommended policy wording. As noted at the start of this paper, DCLG has introduced a new strand to PD rights whereby existing retail units can temporarily change to another use without the need for planning permission. This can create issues for local planning authorities when assessing the retail and shopping function of a particular area as the uses 'on the ground' at any one time may not be reflective of their lawful permitted use. Therefore, whilst there is no certainty that the current flexible approach will continue to be applied after May 2015, we recommend that:

- The primary shopping frontage policy makes reference to the need to take in account the influence of PD rights on the land use mix in a particular area; and
- In order to assist officers with the application of the primary frontage policy, we recommend that Wiltshire Council considers the creation of a register of premises which have changed use under these new PD rights in order that they can sensibly and effectively implement the recommended primary retail frontage policy.

4.28 The final matter to consider in relation to the primary retail frontage policy is whether there needs to be a different policy for different settlements. Not all of the settlements in Wiltshire require a primary retail frontage designation but for those that do the recommended policy (above) does not rely on specific issues or characteristics. Instead, it provides a general set of criteria which are, in our opinion, applicable to all salient settlements (see below). Therefore, we see no obvious reason why alternative versions of the primary retail frontage policies should be adopted by the Council for different settlements. Based upon our review of the town centres in Wiltshire, the centres which should be subject to this policy are:

- Amesbury
- Bradford on Avon
- Calne
- Chippenham
- Corsham
- Devizes
- Downton
- Malmesbury
- Marlborough
- Melksham
- Mere
- Salisbury

- Tisbury
- Trowbridge
- Warminster
- Westbury
- Wilton
- Wootton Basset

4.29 Turning to the **secondary retail frontage policy**, and as noted above, the approach to the structure of the policy wording should be guided by (and in line with) the recommended approach to the definition of this area on the proposals map. Within our previous analysis in Section 3, option (b) was chosen. This allowed secondary retail frontages to accommodate a greater diversity of retail and other main town centre uses than the primary retail frontages and, rather than set a minimum threshold for A1 uses, place the secondary frontage boundary at the outer edge of the Class A retail land use area in each centre. This option was chosen in preference to approaches which either set a minimum proportionate threshold for Class A1 uses or encompasses an area which covers all main town centre uses whether they are retail uses or not.

4.30 Therefore, the wording of the secondary frontage policy should be in line with option (b) of our previous advice in Section 3.

4.31 In terms of the actual wording of the policy, the options to consider are whether:

- The policy should be supportive of just Class A uses; <u>or</u>
- Supportive of Class A and D uses, as set out in the North Wiltshire Local Plan, plus Class B office uses; <u>and</u>
- Whether specific assessment criteria should be used and, if so, which are most appropriate.

4.32 Based upon the content of Annex 2 of the NPPF[19] we consider that the secondary retail frontage policy should also include an allowance for Class B and D uses in addition to Class A uses. The NPPF definition of secondary frontages specifically relates to restaurants, cinemas and businesses (i.e. classes A3, D and B uses) whilst Section 2 of the NPPF refers to main town centre uses as part of the sequential approach and retail, leisure and office uses in relation to the test of impact. It would therefore be inconsistent with the sequential and impact tests if the secondary frontages policies did not refer to leisure and office uses.

4.33 In relation to the use of specific factors to aide consideration of individual applications for development and changes of use in secondary frontage areas, the general approach is likely to be more relaxed than the approach in the primary frontage areas. It does however need to deal with both uses within the categories that the specific policy supports (i.e. Class A, B1 and D uses) and then the other main town centre land uses that are not specifically mentioned.

4.34 In relation to the support for Class A, B1 and D uses, we consider that this should be conditional on the general need for development/changes of use to maintain and enhance the vitality and viability of town centres. In order to undertake this assessment, specific criteria need to be put in place, in either the policy or in the supporting text. Within the existing Local Plans across Wiltshire, the following criteria are used:

- Effect on the retail function of the area;
- Impact on amenity;
- Scale and function; and
- Effect on vitality and viability of the town centre.

4.35 In addition, and in line with our approach to the primary retail frontage policy, we have undertaken an assessment of secondary frontage policies in other development plan

[19] Annex 2 defines secondary retail frontages as providing "greater opportunities for a diversity of uses such as restaurants, cinemas and businesses".

documents which have been examined and adopted after the publication of the NPPF.

- **Bristol (Appendix 8):** Policy DM8 of Bristol's 'Site Allocations and Development Management Policies' plan promotes retail and other related land uses in the secondary frontages where they would help to main or enhance the function of a centre. The policy also expects proposals to: complete the retail function of the centre and not harm its vitality, viability or diversity; not to harmfully dominate or fragment frontages; maintain an appropriate balance and diversity of uses in all part of the secondary frontage; to generate a reasonable level of footfall; provide a shop front with a display function.
- **Ealing (Appendix 9):** within Ealing's Development Management Plan, Policy 4B indicates that A1 retail uses should constitute no less than 40% of the number of units within the designated secondary frontage and that other uses should complement and enhance the functioning of the retail area.
- **Islington (Appendix 10):** Part B of Policy DM4.5 of Islington's Development Management Policies Plan indicates that the general Class A1 retail character of the frontage will be retained while permitting a limited number of non-retail uses. In order to assess the loss of retail uses, the policy requires compliance with the following criteria: retail units do not fall below 50% in the secondary frontage; the break in retail frontages (of not more than two units); the period of vacancy and marketing of the property; the effect of the retail function and viability/vitality of the centre; and, the level of activity in the proposed use. These criteria are, in effect, very similar to the primary frontage area, but with looser controls in relation to the proportion of A1 uses and the break in retail frontage units.
- **Mid Devon (Appendix 11)**: within Mid Devon's Development Management Policies Plan there is no specific policy designation on the proposals maps for secondary shopping frontages. As a consequence, there is no specific planning policy for these areas. Therefore, the secondary shopping areas in Mid Devon's town centres are likely to fall within either the town centre or the primary shopping area boundaries. The criteria for proposals in the PSA have been outlined in the primary frontage policy section above whilst outside the PSA, but within the town centre boundary, will be assessed against the following criteria: ability to retain or enhance a town centre's historic character and appearance, vitality and viability;

sustain or enhance diverse town centre uses and customer choice; and, are readily accessible by public transport, walking and cycling.

- **New Forest (Appendix 12)**: Policy DM15 of the adopted New Forest Sites and Development Management Plan is specific to proposals in the designed secondary shopping frontages. The policy does not sets a specific threshold for Class A1 uses and instead indicates that proposals for retail and "appropriate" non-retail uses will be permitted. Appropriate non-retail uses are defined by the supporting text simply as "appropriate town centre uses", although it is unclear whether this relates specifically to the 'main town centre use' definition in the NPPF.
- **Wokingham (Appendix 13)**: as noted in the previous section, Policy TB15 of Wokingham's 'Managing Development Delivery Document'[20] provides an all-encompassing policy for proposals in different parts of the Borough's town centres. For the proposals within the defined secondary shopping frontages, guidance is limited to part 3(b) which requires that proposals should retain or increase the provision of A1, A2, A3, A4 and A5 uses in the secondary frontages. No minimum proportion for any of these uses is set by the policy, although parts (a), (c) and (d) of the policy require a demonstration that proposals: are of a scale and form that is compatible with the centre and the retail hierarchy; they contribute to the provision of day/evening/night-time uses and are compatible with other uses; and, they enhance vitality and viability. However, it is unclear from Policy TB15 whether, whatever the current proportion of Class A uses in a particular town centre, the current proportion is to be the minimum for the purposes of Policy TB15.
- **Teignbridge (Appendix 14)**: Policy EC8 deals specifically with the defined secondary shopping frontages and notes that town centres should be maintained as a focal point for a balanced, complementary range of uses, including a significant presence of retail and other attractors. The Policy requires that development proposals be considered against all three of the following targets: at least 30% of units in Class A1 use; at least 70% of units in "active" uses; and, no more than 6 adjoining properties are in non-active uses. Active uses are those defined as uses where customers can browse and enter the business, including shops, banks, cafes, pubs, professional offices and leisure facilities.

4.36 Like the saved policies in the existing Wiltshire development plans, there is a generally more relaxed stance in the above recently-adopted plans for secondary retail frontage policies. There does, however, remain differences between the plans, with some imposing quantitative thresholds and some relying on qualitative criteria. However, key themes between both the Wiltshire plans and the more recent plans emerges, which relate to: the need to protect town centre vitality and viability, encourage a diversity of main town centre uses whilst retaining a key Class A retail function and maintaining active frontages.

4.37 Therefore, bases upon the contents of the existing Wiltshire plans, the content of other recently adopted post-NPPF development plans and the content of the NPPF, our recommended secondary frontage policy is as follows:

> ***Proposals for Class A, B1 and D uses will be permitted within the defined secondary frontage areas where they maintain and enhance the vitality and viability of town centres and their effect on the amenity of other surrounding properties and uses. Proposals for other main town centre land uses will assessed on their merits taking into account their effect on the vitality and viability of the town centre and their impact upon the shopping function of the secondary retail frontage area.***

4.38 In order to guide the operation of this policy, we recommend that the supporting text sets out the indicators which should be used to assess the impact on town centre vitality and viability. It is recommended that these factors are:

- Supporting the role and function of the centre. Having regard to the specific role and function of the town centre in question, whether the nature and character of the proposed use is supportive of that role, including its ability to serve the needs of its catchment population.
- Ensuring the continued retail function of the centre, whilst also encouraging a greater diversity of uses. In line the proposed definition of secondary shopping frontages (as outlined in Task 2), the need to ensure that Class A retail uses remain

[20] Adopted February 2014

a key element of the secondary frontage area, whilst allowing for other main town centre uses to be accommodated.

- Ensuring town centre vitality through the day and evening. Ensuring that uses contribute to the vitality and attractiveness of the centre throughout the day and evening.
- The activity of the retail frontage. Whether the proposed use will provide an active frontage and maintain the character of the shopping area.
- Where applicable, the length of vacancy of the unit and the efforts to market the unit for its existing permitted use. The need to actively consider a change to alternative use could, in part, be influenced by the length of time that a unit has remained vacant. In this regard, evidence of marketing the unit for the permitted use will be salient.
- The effect on amenity. Whether the proposed use would give rise to noise, smell or other environmental problems.

4.39 In line with the reasoning and recommendations for the primary retail frontage policy, we see no strong reason why alternative versions of the secondary frontage policy should be adopted by the Council. In particular, the need to maintain and enhance the vitality and viability of town centres should be a consistent theme across all centres in Wiltshire and the recommended assessment criteria are sufficiently general to enable a reasonable and objective assessment for proposals in each centre.

4.40 Based upon our review of the town centres in Wiltshire, the centres which should be subject to the secondary frontage policy are:

- Amesbury
- Bradford on Avon
- Calne
- Chippenham
- Corsham
- Devizes
- Downton

- Malmesbury
- Marlborough
- Melksham
- Mere
- Salisbury
- Tisbury
- Trowbridge
- Warminster
- Westbury
- Wilton
- Wootton Basset

Primary shopping area policies

4.41 The next designation in the sequence of designations is the primary shopping area boundaries which our previous section of the Retail Review indicated should be applied to all centres in Wiltshire. The main purpose of the PSA designation is to guide the operation of the sequential approach in the determination of planning applications for main town centre uses which lie outside of an existing centre and are not in accordance with an up to date development plan.

4.42 Therefore, whilst the PSA boundary has an important role, we do not consider that the PSA requires a policy in its own right and instead the PSA will be referred to in the policy dealing with retail development in edge and out of centre locations (see below).

Town centre boundary policies

4.43 In the existing adopted Local Plans, the use of policies covering town centre boundaries is inconsistent. Kennet and West Wiltshire have a policy, but North Wiltshire and Salisbury do not. In the previous section of this report, we have recommended that each settlement has a town centre boundary, although in some cases this may match the defined PSA boundary.

4.44 The options which are available are to rely upon the detailed policies for primary and secondary frontages, plus edge/out of centre development, or to include a specific policy which deals with town centres. In light of the first and third bullet points in paragraph 23 of the NPPF, the latter option is the most appropriate. These bullet points ask that local planning authorities should recognise town centres at the heart of their communities and set policies that make clear which uses will be permitted in town centre locations.

4.45 Therefore, we propose that a general town centre policy is introduced. The policy should indicate which uses are to be encouraged in town centres and what factors will be included within the Council's consideration of applications (including the relationship to other 'town centre' and 'out of centre' development management policies).

4.46 We propose the following wording:

> ***Subject to the provisions of policies X[21], Y[22] and Z[23], the Council will permit retail, business, leisure, arts, cultural and tourism development within Wiltshire's town centres, as defined on the Proposals Map, provided that the development maintains and enhances the vitality and viability of the town centre and complies with other policies in this Plan.***

4.47 In line with the approach to the primary and secondary frontage policies, there is a need for the town centre boundary policy to be supported by guidance on how to assess whether a proposal maintains and enhances the vitality and viability of the town centre in question. For consistency, it is considered appropriate to adopt the criteria within the secondary frontage policy, as outlined in paragraph 38 above.

4.48 Given its general nature, there is no reason why this recommended policy should not apply to all town centre boundaries across Wiltshire. However, in order to ensure that the specific characteristics of each town centre are taken into account, we have

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[21] Primary retail frontage policy
[22] Secondary retail frontage policy
[23] Edge/out of centre main town centre uses policies

included a criterion in the above list which asks the assessment to relate back to the specific characteristics of each salient Area Strategy.

Retail and main town centre use proposals outside ‘town centre’ boundaries

4.49 In all of the adopted Local Plans, there is a policy which deals with retail development outside of ‘town centre’ boundaries. These policies are summarized in Appendix 3 at the rear of this document and it will be noted that there is not a saved policy on this issue in the Salisbury District Local Plan.

4.50 As can be seen from the appended summary, all saved policies adopt a criteria based approach to assessing retail proposals outside of town centres, although the criteria which are adopted differ between the various policies. A consistent factor in all policies is the sequential and impact tests, both of which remain the central focus for national planning policy in the NPPF. However, due to the time at which they were prepared, all saved policies refer to the test of ‘need’ which no longer features as a national policy test. The North Wiltshire and West Wiltshire policies also include other criteria relating to accessibility.

4.51 Paragraph 23 of the NPPF asks local planning authorities to “set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres” and, therefore, a number of options exist for the Council on this issue. First, continue with the policies in the various Local Plans. Second, adopt a revised approach based upon a reliance on the NPPF (and NPPG), without any further ‘local’ (i.e. Wiltshire) policy guidance. Third, also adopt a revised approach based upon the NPPF (and NPPG), but add further ‘local’ policy guidance.

4.52 In relation to the first option, i.e. retain the existing Local Plan policies, this would be in conflict with the NPPF, given that the test of ‘need’ is no longer a stand-alone national policy test. We consider that any attempt to re-introduce a stand-alone test of ‘need’ into the Council’s development plan is likely to be found unsound and instead it is advisable to consider whether the issues surrounding ‘need’ are better referred to as potential material considerations in relation to the other policy tests. This is considered further below.

4.53 In addition, whilst the inclusion of the sequential test in existing policies is in line with the NPPF, there are subtle differences[24] in each of the policies which require refinement. This is therefore an additional reason why the existing policies should not be retained.

4.54 It is therefore advisable that a new policy, for the consideration of retail and main town centre use proposals outside of town centres, is prepared. In order to be in line with the NPPF, the Council's policy should contain two important elements: consideration of the sequential approach to site selection and a requirement to consider the impact of proposals. In addition, there is a need to consider which uses should be subject to the policy which deals with proposals located outside of town centres. In most cases, the saved policies in the existing adopted Local Plans concentrate upon retail uses, however it is clear that the NPPF requires the sequential test to be applied to main town centre uses (without exception) and the impact test to be applied to retail, leisure and office uses.

4.55 We consider that, in order to ensure that the policies relating to retail, leisure, office and other main town centre uses[25] are workable, it is advisable to be clear about the application of these tests for the different main town centre uses and, where necessary, separate out the sequential and impact tests.

4.56 Based on the NPPF, the sequential test should apply to all main town centre uses and should not operate with a minimum threshold. The policy should however distinguish between edge of centre classifications for retail and other main town centre uses. The following are important considerations:

- Policies should be clear that the sequential test should apply to retail uses which are outside of the defined PSA and apply to other main town centre uses which are outside of the town centre boundary.
- Policies should be clear that the edge of centre classification for retail is up to 300 metres from the PSA and up to 300 metres from the town centre boundary for other main town centre uses

[24] For example, the West Wiltshire Local Plan and the North Wiltshire Local Plan consider the first choice locations to be the primary retail frontages whilst the Kennet Local Plan considers the Town Centre boundary to be the first choice location in the sequential test.

- Policies should set out the sequence of locations – i.e. town centres (i.e. PSAs for retail and town centre boundaries for other main town centre uses), followed by edge of centre locations and only then out of centre locations. The policy should also be clear that, when considering edge and out of centre sites, there is a preference for accessible sites that are well connected to town centres, which is a particularly important consideration for competing edge and out of centre proposals in a particular settlements. See below for further information.
- When assessing alternative sites, the policies should ask for applicants to consider flexibility in terms of scale and format for the proposed development. See below for further information.

4.57 The options which exist for this policy are whether: the policy should solely rely on the NPPG (and NPPG) in terms of the operation of the policy; or, whether the Council should provide further 'local' clarification in order to explain how it intends to approach the sequential and impact tests.

4.58 In relation to the sequential test, the NPPF and NPPG provide important guidance on the basic principles. The NPPF provides guidance on the sequence of locations that should be considered and also explains that when considering edge and out of centre sites, there is a preference for accessible sites that are well connected to town centres. The NPPF also explains the requirement for flexibility on issues such as format and scale.

4.59 The NPPG repeats the key parts of NPPF policy and also explains that "it is for the applicant to demonstrate compliance with the sequential test". The NPPG also explain that, in relation to flexibility, it is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.

4.60 Beyond the above approach, the NPPF and NPPG does not provide any further guidance on the issue of flexibility or the assessment of accessibility/connectivity in relation to town centres.

[25] arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and

4.61 The options for the Council are whether to rely on the NPPF/NPPG guidance or whether to provide further guidance as to how the Council wishes to approach the issues of flexibility and accessibility/connectivity in the sequential test. In terms of the latter, and in the absence of further guidance in the NPPG, attention must turn to recent appeal/call-in decisions and Court judgments to see whether a definitive approach on these issues has been established.

4.62 In relation to the issue of flexibility, this is central to the consideration of the suitability of alternative sites and has been covered by the recent *Dundee* and *Zurich* Court judgments and also several recent appeal/call-in decisions (including the *Rushden Lakes* call-in decision). In these judgments/decisions, a central theme to emerge has been that, in terms of the sequential test, the assessment of the suitability of alternative sites should be based on the proposed development and not some other form of development which is related to either deficiencies in local provision, the scale of development and/or the local retail hierarchy. However, whilst the focus is on 'the proposal', the Secretary of State, in his *Rushden Lakes* call-in decision, went out of his way to repeat guidance in the NPPG which noted that it is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal.

4.63 However, none of these judgments/decisions have set out a clear set of rules/criteria for the assessment of 'flexibility' and it remains the case that each proposal should be assessed against the specific circumstances of that case and local circumstances.

4.64 In response to the NPPF policy of giving preference to accessible sites that are well connected to town centres, the most useful guidance comes from an appeal decision and Court judgments relating to a supermarket proposal in Newport, Shropshire. These set out an approach which requires the assessment of the comparative accessibility of competing/alternative sites, which may possess a similar edge or out of centre classification, in relation to their connections with a nearby town centre (rather than their general accessibility characteristics). In addition, they also explain that a

conference facilities)

straightforward advantage of one site over another, in terms of distance to a nearby town centre, does not necessarily make that site sequentially preferable. Instead, there must be a material difference between the competing/alternative sites, particularly in relation to their ability to generate linked trips and connections with a nearby town centre.

4.65 In light of the above, we consider that the option, where Wiltshire Council's policy provides further clarification of the approach to the sequential test, should be pursued. Whilst the NPPF & NPPG provide a very useful basic foundation of the requirements surrounding flexibility and accessibility/connectivity, there is an opportunity to provide a clarification (in the supporting text to the policy) of what the Council expects applicants to provide as part of the justification for edge or out of centre proposals. In particular, the supporting text should explicitly state that the onus is on the applicant to demonstrate flexibility on issues such as format and scale and that it is not necessary to demonstrate that a potential town centre or edge of centre site can accommodate precisely the scale and form of development being proposed, but rather to consider what contribution more central sites are able to make individually to accommodate the proposal. In this regard, the supporting text should note that the need for flexibility should consider whether a different size and format of development can serve the same purpose as the proposed development, having regard to local circumstances.

4.66 Given that employment, retail, leisure and hotel uses are dealt with in separate policies in the existing draft Core Strategy, it is recommended that any updates to these policies in the review of the Core Strategy incorporate reference to the sequential test. Therefore, whilst Policy 38 already refers to the sequential test for retail and leisure uses, we recommend that the above information regarding flexibility and the sequence of locations is included in any revised policy. Any update to Policy 34 on employment uses should contain a requirement to apply the sequential test to office use proposals outside town centres. Any update to Policy 40 should contain a requirement to apply the sequential test to hotel and conference facility proposals outside of town centres.

4.67 A similar approach should be taken for the impact test. In the NPPF the range of uses which should be subject to the impact test is slightly narrower (retail, office and leisure, rather than all main town centre uses) and therefore this would apply to any updates to policies 34 and 38. As currently drafted, hotels fall into the tourism category (rather than leisure) and therefore, on face value, it would appear that any reference to impact assessments in Policy 40 should be removed. However, given that hotels are a valuable main town centre use and, given that the NPPF asks local authorities to set policies for main town centre uses which cannot be accommodated in or adjacent to town centres, we consider that there is scope for the impact test to remain in any future review of Policy 40.

4.68 We would also recommend that the policy is clear about the sorts of proposals the sequential and impact tests should apply to. These include: new development, extensions to existing facilities, applications for the insertion of mezzanine floors in retail and leisure development, applications to vary the ranges of goods sold from retail stores.

4.69 In relation to the application of the impact test for retail, office, leisure and hotel uses we recommend that the tests of 'impact on investment' and 'impact on town centre vitality and viability' are included. We agree that the current approach of seeking impact assessments for all retail and leisure proposals outside of primary and secondary retail frontages should remain and would recommend extending it to cover office and hotel uses too.

4.70 In relation to the assessment of impact, bearing in mind the two current national tests of 'impact on investment' and 'impact on town centre vitality and viability', we recommend that the supporting text to this policy contains further guidance to order assist applicants in the preparation of their proposals (and supporting documentation) and the Council in determining such applications. We recommend that the following supporting guidance is considered for inclusion by the Council.

4.71 **Impact on investment** test:

- In order to assess whether there will be a detrimental impact upon public and/or private sector investment in a town centre and, if so, the severity of this impact, the following factors should be considered:
  - The stage of the investment project;
  - The policy weight to be attached to the project – i.e. is it in an adopted or emerging development plan document?
  - The extent of expenditure capacity to accommodate new provision in the local area;

  - Whether proposal and the investment project are competing for the same market opportunity;
  - Whether there is evidence that retailers/investors/developers are concerned;
  - Whether the cumulative impact of both schemes would be a cause for concern for nearby town centres.

4.72 Impact on town centre vitality and viability test:

- In order to assess the severity of the impact of a proposal on nearby town centres, the following factors will require consideration:
  - An assessment of the trade diversion from nearby town centres and competing facilities to the proposed development including, for retail development proposals, an assessment of the financial impact on nearby centres;
  - An assessment of both the individual impacts associated with a proposals and also considered cumulatively with other recently completed developments, committed developments and developments under construction;
  - An assessment of the severity of the impact on town centre vitality and viability, taking into account:
    - Both the current health of nearby town centres and change over time;
    - The trading overlap between the proposed development and nearby town centres, including the potential for the proposal to compete with key town centre uses/sectors;
    - The ability of the proposed development to benefit the town centre via linked trips and wider spin-off benefits.

4.73 Many of the prompts for the above criteria come from the 'Practice Guidance on Need, Impact and the Sequential Approach' published by DCLG in 2009 (originally, to accompany PPS4). This guidance has now been superseded by the NPPG although we consider that many of the principles underlying that guidance remain sensible and common-sense when approaching the consideration of the sequential test and impact matters.

4.74 We also recommend that the supporting text to the policy outlines a requirement for applicants to enter into early pre-application negotiations with the Council in order to properly scope out the necessary supporting information in relation to the sequential test and impact assessments. Such an approach will offer the opportunity for applications to be supported by the necessary and appropriate level of information (assuming that there is positive engagement from both applicants and the local planning authority).

4.75 Finally, all that remains is to outline our recommended text for the policy relating to retail and main town centre use proposals outside of town centres. This primarily relates to an update to Policy 38 of the Core Strategy although, as noted above, it can also provide a prompt for policies 34 and 40 as well. Based upon the foregoing analysis and the requirements of national planning policy, we propose the following policy to deal with proposals for retail and other main town centre uses outside of town centres. The recommended text is as follows:

Proposals for retail and other main town centre uses on sites which lie outside of the defined Primary Shopping Areas must be accompanied by an assessment which meets the requirements of national policy and guidance, and demonstrates that:

- ***For all main town centre uses, the proposal complies with the sequential test. This requires applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. In all circumstances, the Council will require applicants to demonstrate flexibility in terms of the scale and format of their proposed development and in the consideration of alternative sites. In relation to edge and out of centre proposals, the Council will give preference to accessible sites that are well connected to nearby town centres.***

- ***All retail, leisure and office uses over 200sq m gross proposal are required to be accompanied by an impact assessment which assesses:***

  - ***The impact of the proposal on public and private sector investment within centres in the catchment area of the proposal; and***
  - ***The impact of the proposal on town centre vitality or viability, including local consumer choice and trade in the town centre and wider area, including a***

cumulative assessment of the proposal together with committed and recently completed developments plus developments under construction.

It is for the applicant to demonstrate compliance with the sequential test and where an application fails to satisfy this test, including the need to demonstrate flexibility, it should be refused. The Council will also refuse planning permission for proposals which are likely to have a significant adverse impact on town centres.

4.76 The supporting text to the Policy should provide the following information:

- Clarification of the contrasting in-centre and edge of centre definitions for retail and other main town centre uses, as set out in paragraph 56 of this note.
- Clarification of the main town centre land use definition, as set out in the Glossary to the NPPF.
- Clarification as to the type of proposals which this policy applies – i.e. proposals for new development, changes of use, extensions, variations in planning conditions/legal obligations in relation to net sales area and the range of goods/services to be sold/provided.
- Clarification as the information that the Council expects to be provided in relation to the sequential test:
  - The onus of the application to demonstrate compliance with the sequential test – see the NPPG and paragraph 59 above.
  - The need for flexibility in scale and format – see paragraphs 59 and 65 above, plus the NPPG.
  - The need for a comprehensive assessment of accessibility and connectivity in relation to edge and out of centre sites, particularly for competing edge and out of centre sites – see paragraph 64 above.
- Clarification on the type and extent of information and analysis required by the Council in relation to the assessment of impact – see paragraphs 69-71 above.
- Confirmation that the Council expects to work in a pro-active manner with applicants during the pre-application stage, including the need to agree a robust scope of supporting information to accompany planning applications.

5. Updated Retail Floorspace Capacity Forecasts

Introduction

5.1 As part of the Wiltshire Core Strategy Retail Review, we have been instructed to prepare an updated set of quantitative need (i.e. expenditure capacity) forecasts for convenience (food) and comparison (non-food) retailing in Wiltshire. This assessment updates the forecasts contained in Chapter 6 and appendices 2 and 3 of the 2011 Wiltshire Town Centre and Retail Study.

5.2 This chapter of the Retail Review report outlines the various assumptions and data inputs which have adopted, including (where applicable) their source and/or justification, along with the results of the updated quantitative forecasts. Where applicable, we also explain the differences in data sources/assumptions used in this latest assessment and those in the 2011 study.

Principal Data Inputs and Assumptions Used

The Structure of the Quantitative Assessment Tables

5.3 Like the 2011 study, separate quantitative forecasts have been prepared for convenience and comparison goods floorspace. The convenience goods assessment is contained at Appendix 4 and the comparison goods assessment contained at Appendix 5.

5.4 For consistency, the structure of the convenience and comparison assessments follows the same structure as the 2011. For convenience goods (Appendix 4), the structure is as follows:

- Table 1 – population forecasts
- Table 2 – per capita expenditure forecasts
- Table 3 – total retail expenditure forecasts
- Table 4 – convenience goods market share
- Table 5 – convenience goods study area turnover (2014)
- Table 6 – summary of turnover levels

- Table 7 – existing convenience goods floorspace benchmark turnover levels
- Table 7a – summary of in-centre/out of centre convenience turnover
- Table 8 - commitments
- Tables 9a-9q – retail floorspace capacity
- Table 10 – summary of convenience goods capacity projections

5.5 For comparison goods (Appendix 5), the structure is as follows:

- Table 1 – population forecasts
- Table 2 – per capita expenditure forecasts
- Table 3 – total retail expenditure forecasts
- Table 4 – comparison goods market share
- Table 4a – comparison goods study area turnover (2014)
- Tables 5 & 6 – summary of in-centre/out of centre comparison goods turnover
- Table 7 – existing comparison goods floorspace
- Table 7a – summary of comparison goods floorspace
- Table 8 – comparison goods turnover of town centres in Wiltshire
- Table 9 – comparison goods commitments
- Tables 10a-10o – retail capacity forecasts
- Table 11 – summary of retail capacity forecasts

Study Area

5.6 We have used the same study area as the 2011 study and a plan of this area can be found at Appendix 6 to this report. This area is considered to represent a geographical area which encompasses the catchment areas for convenience and comparison goods shopping for the various main settlements in Wiltshire. As shown on the plan at Appendix 6, the study area is split up into 28 separate zones in order to capture localised shopping patterns for convenience and comparison goods shopping across Wiltshire and into the surrounding administrative areas.

Forecasting Dates

5.7 The start date for the updated quantitative assessment is 2014. For the future, we have prepared forecasts for 2019, 2024 and 2026.

Catchment Population

5.8 Population data for the 28 study area zones has been obtained from Experian. This latest data takes full account of the results of the 2011 Census, which were not available at the time of the previous 2011 study. Future forecasts of population change are also provided by Experian, which take into account the latest ONS sub-national population forecasts using the results of the 2011 Census.

5.9 Use of Experian's population growth forecasts is consistent with the 2011 study although there are, due to the 2011 Census results and revised growth forecasts, differences between the two sets of data.

Price Basis

5.10 All monetary values in this report are in constant 2012 prices, unless otherwise stated, so as to exclude the effects of price inflation.

Per Capita Expenditure

5.11 To inform our assessments of expenditure capacity and impact, up-to-date estimates of per capita retail expenditure on convenience goods have been obtained from Experian. The data which has been obtained is for the year 2012, expressed in 2012 prices.

5.12 In order to bring the per capita spending levels up to the base year for the assessment (2014) and then across the assessment period (up to 2026) we have adopted the following forecasts provided by Experian:

- Convenience goods:
  - 2012-2013 = -1.3%pa
  - 2013-2014 = -0.5%pa
  - 2014-2015 = 0.5%pa
  - 2016-2026 = 0.6%pa

- Comparison goods:
  - 2012-2013 = 4.6%pa
  - 2013-2014 = 5.6%pa
  - 2014-2015 = 4.4%pa
  - 2016-2026 = 3.3%pa

5.13 For convenience goods expenditure, the latest forecasts show a more pessimistic view of expenditure growth than the 2011 study between 2012 and 2015, although the growth rate post 2015 is very slightly higher than that used in the 2011 study.

5.14 For comparison goods expenditure, the overall growth rate between 2012 and 2026 is lower that used in the 2011 study, due to the on-going fragility of the retail sector.

Special Forms of Trading (including internet shopping)

5.15 Given that updated assessment of floorspace capacity is designed to concentrate upon physical retail floorspace in Wiltshire, it is appropriate to remove retail expenditure which is not spent shops in the local area. This element of expenditure is commonly known as 'special forms of trading' and includes mail order and internet shopping.

5.16 Using advice provided by Experian[26], we have deducted the following rates of convenience and comparison goods expenditure over the assessment period:

- Convenience goods:
  - 2014 = 2.6%pa
  - 2019 = 3.8%pa
  - 2024 = 4.8%pa
  - 2026 = 5.0%pa
- Comparison goods:
  - 2014 = 11.7%pa
  - 2019 = 15.3%pa

- 2024 = 16.0%pa
- 2026 = 15.9%pa

5.17 When compared with the SFT rates used in the 2011 study, the convenience goods rates are very similar, although the comparison goods deductions are materially higher due to the on-going growth in internet sales for non-food goods.

Shopping Patterns in the Study Area

5.18 This updated quantitative assessment uses the same household survey data commissioned for the 2011 study. Therefore, both studies share the same base shopping patterns data for convenience and comparison goods shopping across the 28 study area zones although, due to store openings and commitments granted planning permission since 2011, the market shares for the main settlements are amended to take into account, where necessary, the impact of this new retail floorspace.

Visitor Expenditure from outside the Catchment Area

5.19 For those settlements which are either located close to the edge of the study area and/or are sufficiently large so as to attract shopping trips from a wide catchment, we have allowed for visitor expenditure from residents living outside of the study area. The retail capacity tables indicate which settlements this applies to.

Existing shop floorspace, commitments, sales densities & benchmark turnover levels

5.20 Given the changes in retail floorspace and occupation of some retail outlets since 2011, our updated assessment has undertaken the following actions:

- Where available, new town centre floorspace for the main settlements has been obtained from Experian;
- Where there have been changes in the occupation and scale of retail warehouse and supermarket floorspace, these are also recorded;
- Details of the retail commitments included within the 2011 study and those commitments granted permission after the completion of the 2011 study are

[26] Experian Retail Planner Briefing Note 12.1 (2014)

recorded in Table 8 (Appendix 4) for convenience goods and Table 9 (Appendix 5) for comparison goods.

- In the 2011 study, company average sales density information was used to calculate the benchmark turnover of existing and committed convenience goods floorspace across Wiltshire. More up to date data is now available from Verdict and we have utilised this data in our latest assessment.
- For comparison goods floorspace benchmark levels, we have used the levels outlined in the 2011 study and updated these to a 2014 base.

Structure of updated quantitative forecasts for convenience and comparison goods floorspace

5.21 Tables 9a to 9q in Appendix 4 provide the updated quantitative need assessments for convenience goods floorspace in each of the main settlements in Wiltshire. Tables 10a to 10o in Appendix 5 provide a similar assessment for comparison goods floorspace across the main settlements.

5.22 In both assessments, a consistent structure is used in each capacity table (moving from top to bottom in each table):

- Calculation of the total amount of available retail expenditure within the study area;
- The market share of the settlement under consideration (taking into account the impact of any commitments on its overall market share);
- Followed by its total retail turnover (also taking into account commitments);
- The benchmark sales for existing floorspace is then provided, followed by, if applicable the benchmark sales of commitments;
- The residual expenditure to support new floorspace is then calculated by subtracting the benchmark turnover of existing and committed floorspace from the actual turnover of facilities in each settlement. Where this results in a positive figure, then this signifies that there is capacity to provide additional retail floorspace. In contrast, a negative figure signifies an oversupply of floorspace and no need for additional floorspace to be provided in that particular settlement.

- In order to translate the residual expenditure into a floorspace capacity estimate for each settlement, we have used sales densities for retail sales floorspace which are relevant to convenience and comparison goods floorspace and the type of centre being assessed.

5.23 We now turn to the results of our updated convenience and comparison goods assessments.

Updated convenience goods floorspace assessment

5.24 Table 5.1 below provides a summary of the convenience goods floorspace capacity forecasts provided in Appendix 4. For ease of reference, the forecasts from the 2011 study are also provided.

Table 5.1: 2011 and 2014 convenience goods floorspace forecasts

Urban Area of Centre	2014 Update Study			2011 Study		
	2019 (Sq m net)	2024 (Sq m net)	2026 (Sq m net)	2020 (Sq m net)	2025 (Sq m net)	2026 (Sq m net)
SSCT						
Salisbury	1,127	1,964	2,162	554	1487	1675
Trowbridge	-3,244	-2,634	-2,489	-4332	-3731	-3618
Chippenham	999	1,777	1,961	1338	2011	2141
Market Towns						
Amesbury	-10	199	249	-1496	-1336	-1304
Bradford on Avon	79	191	217	329	456	481
Calne	225	480	540	928	1115	1145
Corsham	380	437	450	-62	-29	-23
Cricklade	165	183	187	294	308	312
Devizes	-3	307	380	-302	-60	-9
Ludgershall	68	95	100	30	76	86
Malmesbury	-567	-476	-455	243	277	284
Marlborough	-423	-244	-202	-2016	-1914	-1897
Melksham	-2,781	-2,548	-2,492	-3697	-3447	-3396
Tidworth	-901	-807	-784	-1027	-869	-838
Warminster	123	361	418	-24	235	285
Westbury	-918	-822	-799	-1188	-1076	-1054
Wootton Bassett	-785	-735	-723	-428	-363	-353

5.25 Table 5.1 shows that, on the whole, there has been very little material change in the levels of forecast capacity in each of the main settlements. In particular:

- It remains the case that there is no capacity for additional convenience goods floorspace in Trowbridge, Marlborough, Melksham, Tidworth, Westbury and Wootton Bassett.

- Similar levels of capacity remain in Salisbury, although this is relatively modest and only occurs in the medium to longer term. In the longer term, i.e. by 2024/2026, a modest new foodstore or a sizeable extension to an existing store, can be supported.
- There has been a reduction in capacity in Chippenham, due to the proposed supermarket at Langley Park which has a resolution to grant planning permission. Additional capacity still remains in Chippenham although, like Salisbury, this is over the medium to longer term. Like Salisbury, the longer term capacity can support a modest new foodstore or an extension to an existing store.
- There have been reductions in capacity in Calne, Cricklade and Bradford on Avon. In relation to Calne, which has been the largest decrease of the three, this is due to the approved Tesco store. The capacity that remains can support small scale additions to convenience goods floorspace in these towns,
- There has been a decrease (and elimination) in capacity in Malmesbury due to the approval of the Waitrose supermarket.
- There has been a small increase in longer term capacity levels in Warminster although the difference is minimal and can only support small scale improvements.

Updated comparison goods floorspace assessment

5.26 Table 5.2 below summarises the results of our updated comparison goods floorspace assessment and, like the convenience goods table above, the results are presented alongside the 2011 study forecasts.

Table 5.2: 2011 and 2014 comparison goods floorspace forecasts

Urban Area of Centre	2014 Update Study			2011 Study		
	2019 (Sq m net)	2024 (Sq m net)	2026 (Sq m net)	2020 (Sq m net)	2025 (Sq m net)	2026 (Sq m net)
SSCT						
Salisbury	5,958	13,378	16,531	12,168	23,196	25,587
Trowbridge	1,606	5,367	6,965	11,169	19,517	21,242
Chippenham	5,348	9,324	11,013	7,975	13,337	14,479
Market Towns						
Amesbury	-1,381	-822	-584	-1,444	-957	-853
Bradford on Avon	162	262	305	205	347	379
Calne	-615	-439	-364	302	505	547
Corsham	305	469	539	308	521	567
Cricklade	58	78	86	31	53	58
Devizes	138	1,105	1,516	2,125	3,567	3,889
Ludgershall	0	0	0	0	0	0
Malmesbury	524	714	795	280	471	512
Marlborough	804	1,368	1,607	938	1,599	1,735
Melksham	-84	572	850	1,479	2,446	2,657
Tidworth	49	72	81	55	92	100
Warminster	699	1,636	2,034	1,891	3,418	3,744
Westbury	178	338	406	450	745	809
Wooton Bassett	229	339	386	220	368	400

5.27 The above table provides the following information regarding the key settlements in Wiltshire:

- In most cases the levels of available additional floorspace capacity have been reduced. Whist this is sometimes due specific commitments which have occurred since the 2011 study (see Table 9 at Appendix 5 and below), the changes in forecast population growth levels, the increase in online sales and lower retail expenditure growth levels are a significant contributor to this change.
- Salisbury's capacity has reduced by just under 40% by 2026. Not only is this due to the matters outlined above but also but to a slight reduction in market share due to commitments in Amesbury and also due to new commitments granted permission in Salisbury itself. In the short term, comparison goods floorspace capacity in

Salisbury is minimal, although it does grow substantially by 2024-2026. Moreover, these capacity levels are based upon a constant market share for the city and further capacity would be generated where a city centre development scheme is able to raise the city's market share via the diversion of expenditure from settlements such as Southampton and Bournemouth which currently attract comparison goods expenditure from the Salisbury catchment. Whether it be the constant market share approach, or an approach where additional capacity can be created, then there remains potential for a significant expansion of comparison goods floorspace in Salisbury should the commercial market be able to deliver a city centre scheme.

- The level of capacity in Trowbridge has reduced significantly. Not only is this due to the above trends, but also due to some loss of market share to other surrounding settlements (via commitments) but also due to new commitments. In addition, this latest analysis does not model a one percentage point increase in market share that the 2011 study allowed for. Whilst a one percentage point increase does not, on face value, seem like a significant increase, it is equivalent to a rise of one fifth in Trowbridge's market share. Despite this lower capacity, Trowbridge has benefitted from substantial new comparison goods floorspace in recent years including the Shires Gateway scheme and the non-food floorspace within the Sainsburys and committed Morrisons stores.
- Chippenham's capacity has also fallen due to commitments, including the ASDA store, a new retail unit at Hathaway Retail Park and large extension to the out of centre Sainsburys store. Capacity levels nevertheless remain reasonably high and are able to support substantial new retail floorspace development such as at the Bath Road car park site.
- In relation to other settlements, the lower capacity levels are modest and suggest that only small levels of new comparison goods floorspace can be provided for. Notable reductions in capacity include Calne and Melksham where new supermarkets and their comparison goods floorspace will expand choice and competition.

5.28 For the avoidance of doubt, and unless otherwise indicated, the above floorspace capacity estimates are based on a constant market share for convenience and comparison goods shopping in each of the main settlements in Wiltshire. There may be opportunities for a change in the market share of certain settlements, although this will be dependent on the type and scale of new proposals in each settlement.

5.29 In addition, given the nature of population and retail expenditure forecasts from Experian, the first five years of our updated quantitative need forecasts are the most reliable. The medium to longer term projections should be treated with caution.

6. Site Assessments

6.1 Paragraph 23 of the NPPF notes that local planning authorities should allocate a range of suitable sites to meet the scale and type of retail development needed in town centres and that retail needs should be met in full and should not be compromised by limited site availability. As a consequence, local planning authorities should therefore, where necessary, undertake an assessment of the need to expand town centres to ensure that a sufficient supply of suitable sites. The NPPF goes on to note that, in line with the sequential approach to site selection, local planning authorities should allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, the NPPF asks local authorities to set policies for meeting the identified need in other accessible locations that are well connected to the town centre.

6.2 Following our updated assessment of the need for additional retail floorspace across the main settlements in Wiltshire, our brief from WC asks for an assessment of key sites which might be required to meet the identified need. Our assessment has concentrated upon sites within Salisbury, Trowbridge and Chippenham, including:

- **Chippenham**
  1. Langley Park & Hathaway Retail Park
  2. Bath Road car park and the Bridge Centre
  3. Emery Gate Shopping Centre
  4. Land to the east of The Bridge
- **Trowbridge**
  5. Castle Street
  6. ASDA / The Shires
  7. East Wing
  8. Court Street car park
  9. Cradle Bridge

10. Court Street area
11. Castle Place Shopping Centre
12. Town Bridge / Wicker Hill

- **Salisbury**

13. Maltings car park
14. Salt Lane car park
15. Brown Street car park
16. Land at Old Manor Hospital
17. Harnham Business Park
18. Longhedge
19. Salisbury Retail Park
20. Fugglestone Red and Old Sarum employment land allocation
21. UKLF site
22. Imerys Quarry

6.3 Each of the above sites, following a site visit, has been subject to a detailed assessment, focusing upon issues such as planning policy, accessibility, potential site constraints, viability and commercial market factors. A detailed assessment proforma for each site is contained at Appendix 7 to this report, using the numbering outlined above.

6.4 Our conclusions and recommendations regarding each settlement are set out in turn below.

Chippenham

6.5 Sites numbered 1-4 at Appendix 7 relate to Chippenham. The three sites which are likely to be able to accommodate the majority or all of the identified need for convenience and comparison goods floorspace in the town are the Bath Road car park, Langley Park and Emery Gate Shopping Centre.

6.6 WC has recently resolved to grant planning permission for a substantial amount of retail floorspace Langley Park, including a new supermarket and an extension to Hathaway Retail Park. Langley Park remains the most sequentially preferable site to accommodate a large supermarket in Chippenham and there is potential for improvements to be made to the adjacent retail park, which is a second-choice location for large format retail units after the Bath Road car park (see below). Indeed, beyond the provision of a new supermarket at Langley Park, there is no need, in our opinion, to allocate a site in Chippenham for another new supermarket.

6.7 However, beyond the supermarket at Langley Park, smaller scale convenience goods floorspace is also a potential use for the Bath Road car park, alongside comparison goods flooorspace. The Bath Road car park remains the best opportunity for a significant addition to comparison goods floorspace on the edge of Chippenham town centre and has the ability to accommodate large format retail units and customer car parking provision.

6.8 More modest opportunities are available via refurbishment and extension to the Emery Gate Shopping Centre, which lies within the town centre and offers the potential for an expansion to the core retail area.

Trowbridge

6.9 The Trowbridge sites in Appendix 7 are numbered 5-12. These sites present a variety of opportunities for development in Trowbridge town centre, including new retail development.

6.10 In recent years, permission has been granted for large scale retail development in Trowbridge, including a Morrisons supermarket on the Bowyers factory site and the Shires Gateway comparison goods floorspace development. This has been supplemented by a leisure scheme on the St Stephen's Place. The scale of this new/committed floorspace may mean that further additional retail floorspace may be short to medium term aspiration. However, our analysis highlights the following key opportunities:

- Cradle Bridge. An opportunity for new larger format retail units which cannot be accommodated in the core retail area.

- The Shires. A medium to longer-term opportunity to refurbish and expand the shopping centre
- East Wing & Court Street. Opportunities for mixed use development, including retail and leisure, along with the potential to provide better linkages to the St Stephens Place development.
- Castle Street. An opportunity for a new link between the core retail area and the St Stephens Place leisure scheme.
- Castle Place Shopping Centre. Medium opportunities to improve the shopping centre and provide additional retail floorspace.
- Town Bridge / Wicker Hill. Opportunities to improve this important entrance to Trowbridge town centre from the north and provide better linkages with the redevelopment of the Bowyers site.

Salisbury

6.11 Sites 13-22 at Appendix 7 lie within Salisbury and represent a range of city centre and out-of-centre locations. Of the three sites within the city centre, the key retail development site remains the Maltings Shopping Centre and car park. This site has long been identified as offering a significant extension to the core retail area and is able to provide new comparison goods floorspace along with the potential for a remodelled/redeveloped supermarket use. As such it remains the sequentially preferable location for both comparison and convenience goods floorspace within Salisbury and should be a key strategic site allocation within the development plan. It is understood that, following a recent marketing exercise, the new owners of the Shopping Centre are TIAA-Henderson.

6.12 Of the remaining city centre sites, these comprise surface-level car parking areas (Salt Lane and Brown Street) and offer the potential for mixed use developments where there is the ability to lose/reprovide car parking capacity to facilitate the availability of these sites.

6.13 The remaining sites in Salisbury considered in Appendix 7 are located out of centre and are therefore not first choice locations for retail development in the city. This does not mean that all retail development should be ruled as, for example, as the large Salisbury Retail Park site on London Road has a commitment for large scale bulky goods retail units. However, it should be noted that this site also has a planning application in for a supermarket use and if this was approved and built out rather than the bulky goods scheme, this may create an addition comparison floorspace as the retail park is identified as a commitment within this study.

7. Summary and Conclusions

7.1 This report has been prepared by GVA for Wiltshire Council ('WC') following an instruction by WC to prepare a Wiltshire Retail Review ('the Retail Review') which will support a partial review of the Wiltshire Core Strategy ('WCS').

7.2 Following the formation of WC as a unitary authority in 2009, WC has been preparing the WCS has replaced a number of saved policies within the adopted extant Local Plan and Core Strategy documents across the four former district councils.

7.3 The WCS carries forward a number of town centre boundary definitions from the adopted development plans in Kennet, North Wiltshire, Salisbury/South Wiltshire and West Wiltshire although, in line with the recommendations of the WCS Inspector. it makes a commitment that necessary amendments to these boundaries and corresponding policies will be identified via a Partial Review of the WCS.

7.4 In light of the recommendations of the WCS Inspector and the content of the adopted WCS, this review of retail and main town centre policy issues comprises the following:

- Confirming that the network and hierarchy of centres in Wiltshire is appropriate
- Confirming that the extent of town centres (includes all main town centre uses, offices, bingo halls, theatres, hotels etc) and primary shopping areas to include primary and secondary frontages in designated centres is correctly defined in line with NPPF
- Identifying appropriate policies to make it clear which town centres uses will be permitted in town centres / primary shopping areas across the different centres, this may result in a different policy approach for different centres.
- Identifying a range of suitable sites that are in compliance with NPPF to meet the scale and type of town centre uses needed in the towns of Trowbridge, Chippenham, Corsham, Cricklade, Devizes, Marlborough, Melksham, Tidworth, Warminster and Westbury. Where there is only a small amount of need identified advise with evidence whether this need may be better met in an adjacent centre.
- Advising on the setting of policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres.

Retail Hierarchy

7.5 Following a review of a number of factors, including the amount existing retail floorspace, current turnover levels and the national ranking of each of the main centres in Wiltshire, this report has recommended the following hierarchy for Wiltshire:

Table 2.2: Recommended Wiltshire Retail Hierarchy

Centre	Recommended Position in Retail Hierarchy
Salisbury	Principal Settlement
Trowbridge	Principal Settlement
Chippenham	Principal Settlement
Devizes	Market Town
Warminster	Market Town
Marlborough	Market Town
Melksham	Market Town
Amesbury	Market Town
Bradford on Avon	Market Town
Calne	Market Town
Corsham	Market Town
Malmesbury	Market Town
Westbury	Market Town
Wootton Bassett	Market Town
Tidworth	Market Town
Cricklade	Local Service Centre
Downton	Local Service Centre
Ludgershall	Local Service Centre
Market Lavington	Local Service Centre
Mere	Local Service Centre
Pewsey	Local Service Centre
Tisbury	Local Service Centre
Wilton	Local Service Centre

Town Centre Policies

7.6 Within the adopted Local Plans, a range of primary and secondary frontage, primary shopping area and town centre boundary definitions and associated policies are provided. Following analysis of these existing policies, along with a review of the approach taken by other local planning authorities across the country, a methodology for determining new boundaries has been proposed and a new set of proposed policies and boundaries for primary and secondary frontages, primary shopping and town centre areas and out of town retail and leisure development. The boundaries for each settlement area are described below, whilst the recommended policy for each defined boundary are consistent across the whole of the local planning authority area, in order to provide consistency.

Retail Floorspace Capacity Forecasts

7.7 In addition convenience and comparison capacity projections have been re-run in order to provide an up to date position and identify if additional retail development sites need to be identified through the partial review process.

The Main Settlements

7.8 Set out below are our recommendations for each of the main settlements across Wiltshire in terms of town centre boundary definitions and, where applicable, recommendations regarding site allocations for the main settlements.

Amesbury

7.9 Following the opening of the Tesco store, there is minimal surplus capacity for additional convenience goods floorspace (249sq m net by 2026) and (-584sq m net by 2026) no capacity for additional comparison goods floorspace in Amesbury.

7.10 The plans at Appendix 15 show the recommended boundaries for Amesbury town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Bradford on Avon

7.11 In line with the findings of the 2011 Retail Study, there is a small amount of surplus capacity for additional convenience (217sq m net by 2026) and comparison goods (305sq m net by 2026) floorspace in Bradford on Avon. However, the level of capacity is relatively small and not sufficient to prompt the allocation of land for new development.

7.12 The plans at Appendix 16 show the recommended boundaries for Amesbury town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Calne

7.13 The amount of surplus capacity to accommodate additional convenience and comparison goods floorspace has been reduced following the grant of planning permission for a new supermarket. Our latest assessment indicates that comparison goods floorspace capacity has been eliminated (-364sq m net by 2026), whilst there remains a modest amount of capacity for additional convenience goods (540sq m net by 2026) in the longer term. However, the level of capacity of capacity is relatively small and not sufficient to prompt the allocation of land for new development.

7.14 The plans at Appendix 17 show the recommended boundaries for Calne town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Chippenham

7.15 The quantitative capacity for convenience goods floorspace in Chippenham (1,961sq m net by 2026) has been reduced following the need to take into account the resolution of the Council to grant planning permission for a new supermarket at Langley Park. In addition, the Langley Park 'commitment' also has an effect on the amount of capacity for additional comparison goods floorspace (11,013sq m net by 2026), although the amount of capacity in the town remains relatively large and should, in the first instance, be directed to the Bath Road car park / Bridge Centre site on the edge of Chippenham town centre.

7.16 The plans at Appendix 18 show the recommended boundaries for Chippenham town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Corsham

7.17 The amount of capacity for additional comparison goods floorspace in Corsham remains modest (539sq m net by 2026) and is similar to the findings of the 2011 Retail Study. In contrast, the amount of capacity for additional convenience goods floorspace in the town has increased (450sq m net by 2026), although it remains at a relatively modest level. However, the level of capacity is relatively small and not sufficient to prompt the allocation of land for new development.

7.18 The plans at Appendix 19 show the recommended boundaries for Corsham town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Cricklade

7.19 The amount of quantitative capacity for convenience (187sq m net by 2026) and comparison goods floorspace (86sq m net by 2026) in Cricklade remains relatively modest and is not sufficient to prompt an allocation of land for additional retail development. The plans at Appendix 20 show the recommended boundaries for Cricklade town centre which include town centre and primary shopping area only.

Devizes

7.20 Our updated analysis indicates that the amount of convenience goods floorspace capacity in Devizes has risen but remains a very modest levels (380sq m net by 2026). There has also been a reduction in the amount of capacity for comparison goods (1,516sq m net by 2026) floorspace in the town and, in the medium to longer term, is one of the largest in the market towns in Wiltshire. However, given that this capacity arises over the longer term, we do not consider there is an urgent need to allocate a significant areas land for this level of capacity although if suitable town centre sites and premises exist then this should be prioritised.

7.21 The plans at Appendix 21 show the recommended boundaries for Devizes town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Downton

7.22 The plans at Appendix 22 show the recommended boundaries for Downton which include the same boundary for the town centre and primary shopping area, along with primary/secondary shopping frontage areas. As Downton is a Local Service Centre it is too small to warrant retail floorspace capacity forecasts.

Ludgershall

7.23 Our updated capacity analysis reconfirms that there is limited capacity for additional convenience goods floorspace (100sq m net by 2026) in Ludgershall over the period up to 2026. Due to the small size of Ludgershall there are no floorspace forecasts for comparison goods for the settlement. The plan at Appendix 23 to this report recommends a combined town centre/primary shopping area boundary for the town.

Malmesbury

7.24 Whilst the amount of comparison goods floorspace capacity in Malmesbury has remained relatively constant (795sq m net by 2026) since the 2011 Retail Study, the amount of convenience goods floorspace capacity in the town has fallen (-455sq m net by 2026) due to the grant of permission for a new Waitrose supermarket. However, the level of capacity is relatively small and not sufficient to prompt the allocation of land for new development.

7.25 The plans at Appendix 24 show the recommended boundaries for Malmesbury town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Market Lavington

7.26 The plan at Appendix 25 to this report recommends a combined town centre/primary shopping area boundary for Market Lavington. As Market Lavington is a Local Service Centre it is too small to warrant retail floorspace capacity forecasts.

Marlborough

7.27 In line with the findings of the 2011 Retail Study, there remains no capacity for additional convenience goods floorspace (-202sq m net by 2026) within Marlborough over the period to 2026. However, there remains capacity for additional comparison goods floorspace (circa 1,600sq m net by 2026). This level of capacity arises over the longer term and therefore there is no urgency to allocate significant land areas. However, if existing town centre sites and premises in Marlborough can be identified for a modest amount of new floorspace then they should be included in the next version of the site allocations plan.

7.28 The plans at Appendix 26 show the recommended boundaries for Marlborough town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Melksham

7.29 In line with the findings of the 2011 Retail Study, there remains an over-provision of convenience goods floorspace in Melksham, following the introduction of the ASDA store (-2,492sq m net by 2026). There has also been a reduction in the amount of comparison goods floorspace capacity, which is now relatively modest in the medium to longer term (850sq m net by 2026) and not felt sufficient to prompt the allocation of land for new development.

7.30 The plans at Appendix 27 show the recommended boundaries for Melksham town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Mere

7.31 The plans at Appendix 28 show the recommended boundaries for Mere town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas. As Mere is a Local Service Centre it is too small to warrant retail floorspace capacity forecasts.

Pewsey

7.32 The plans at Appendix 29 show the recommended boundaries for Pewsey, including separate town centre and primary shopping areas.

7.33 As Pewsey is a Local Service Centre it is too small to warrant retail floorspace capacity forecasts.

Salisbury

7.34 Salisbury remains the settlement in Wiltshire with the largest amount of capacity for comparison goods floorspace, with capacity for 6,000sq m net by 2019, rising to 13,000sq m net by 2024 and 16,500sq m net by 2026. This is a reduction from the findings of the 2011 Retail Study, although it remains a significant amount of capacity and to accommodate a large amount of new city centre floorspace.

7.35 For convenience goods floorspace, the level of capacity for additional space has increased slightly (-1,127sq m net by 2019, rising to 1,964sq m net by 2024 and 2,162sq m net by 2026) and remains sufficient to accommodate a medium-sized new store or an extension/enlargement of an existing facility.

7.36 In both cases, the Maltings Shopping Centre and car park offer the best opportunity to provide comparison and convenience goods floorspace in Salisbury city centre and we have recommended that this area should remain the focus for the retail strategy.

7.37 The plans at Appendix 30 show the recommended boundaries for Salisbury city centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Tidworth

7.38 In line with the findings of the 2011 Retail Study, there remains an over-provision of convenience goods floorspace in Tidworth (-784sq m net by 2026). Similarly, there is a modest amount of capacity for new comparison goods floorspace (80sq m net by 2026) although it is insufficient to prompt the allocation of land for new development.

7.39 The plans at Appendix 31 show the recommended boundaries for the town centre and primary shopping areas in Tidworth.

Tisbury

7.40 The plans at Appendix 32 show the recommended boundaries for Tisbury town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas. As Tisbury is a Local Service Centre it is too small to warrant retail floorspace capacity forecasts.

Trowbridge

7.41 In light of the grant of planning permission for a new Morrisons supermarket, there remains an over-provision of convenience goods retail floorspace within Trowbridge and thus no need to allocate for this type of retail use. Capacity for additional comparison goods floorspace has fallen since the 2011 study, due to the implementation of the Shires Gateway scheme and other commitments and now stands at circa 7,000sq m net by 2026. On this basis, there remains a need to allocate land for additional comparison goods floorspace, although this is likely to be delivered over the medium to longer term. We recommend that the Cradle Bridge, Castle Place Shopping Centre, East Wing and Shires Shopping Centre sites are prioritised for new comparison goods floorspace.

7.42 The plans at Appendix 33 show the recommended boundaries for Trowbridge town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Warminster

7.43 Our updated capacity analysis indicates that there remains a modest amount of capacity for convenience (418sq m net by 2026) and comparison goods floorspace within Warminster. The greater amount of capacity lies in the comparison goods sector (circa 2,000sq m net by 2026) and we consider that the Council should seek to allocate modest amounts of land within the town centre to accommodate this new development.

7.44 The plans at Appendix 34 show the recommended boundaries for Warminster town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Westbury

7.43 In line with the findings of the 2011 Retail Study, there remains an over-provision of convenience goods floorspace in Westbury (-799 sq m net by 2026). Similarly, there is a modest amount of capacity for new comparison goods floorspace (406 sq m net by 2026) although it is insufficient to prompt the allocation of land for new development.

7.44 The plans at Appendix 35 show the recommended boundaries for Warminster town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Wootton Bassett

7.45 Within Wootton Bassett there remains a lack of surplus capacity for additional convenience goods floorspace (-723sq m net by 2026) and also only a modest level of capacity for new comparison goods floorspace (386sq m net by 2026). In providing these forecasts it is acknowledged that there is leakage of expenditure from Wootton Bassett to Swindon and there could be an opportunity to claw back some of this expenditure, which may in turn boost the level of floorspace. However, the exact level of capacity will be dependent upon the scale and nature of any scheme proposed and meeting policy requirements of the NPPF and the partial review of the WCS.

7.46 The plans at Appendix 37 show the recommended boundaries for Wootton Bassett town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas.

Wilton

7.47 The plans at Appendix 36 show the recommended boundaries for Wilton town centre which include town centre, primary shopping area and primary/secondary shopping frontage areas. As Wilton is a Local Service Centre it is too small to warrant retail floorspace capacity forecasts.

Development Management Policies

7.48 This report also assesses the available options for policies for the primary and secondary retail frontages, primary shopping areas, town centre boundaries and proposals outside of the primary shopping areas. It highlights the following proposed policy wording as a result of the assessment.

Primary Retail Frontages

Within the primary retail frontages identified on the proposals map, the change of use of ground floor Class A1 shop premises to Class A2, A3, A4 and A5 will only be permitted where the proposed use would not undermine the retail function of the town centre and maintain and enhance its vitality and viability. The determination of each application will have regard to the following factors:

I. *The location and prominence of the premises;*

II. *The size and width of the premises;*

III. *The number and distribution of other existing and committed non-A1 uses within the defined primary retail frontage (including any premises subject to current Permitted Development changes of use);*

IV. *Where applicable, the length of vacancy of the premises and evidence of marketing for the current permitted use;*

V. *The nature and character of the proposed use; and*

VI. *The design of the shop-front.*

7.49 Based upon our review of the town centres in Wiltshire, the centres which should be subject to this policy are:

- Amesbury
- Bradford on Avon
- Calne
- Chippenham
- Corsham
- Devizes
- Downton
- Malmesbury
- Marlborough
- Melksham
- Mere
- Salisbury
- Tisbury
- Trowbridge
- Warminster

- Westbury
- Wilton
- Wootton Bassett

Secondary Retail Frontages

> *Proposals for Class A, B1 and D uses will be permitted within the defined secondary frontage areas where they maintain and enhance the vitality and viability of town centres and their effect on the amenity of other surrounding properties and uses. Proposals for other main town centre land uses will assessed on their merits taking into account their effect on the vitality and viability of the town centre and their impact upon the shopping function of the secondary retail frontage area.*

7.50 In order to guide the operation of this policy, we recommend that the supporting text sets out the indicators which should be used to assess the impact on town centre vitality and viability. It is recommended that these factors are:

- Supporting the role and function of the centre. Having regard to the specific role and function of the town centre in question, whether the nature and character of the proposed use is supportive of that role, including its ability to serve the needs of its catchment population.
- Ensuring the continued retail function of the centre, whilst also encouraging a greater diversity of uses. In line the proposed definition of secondary shopping frontages (as outlined in Task 2), the need to ensure that Class A retail uses remain a key element of the secondary frontage area, whilst allowing for other main town centre uses to be accommodated.
- Ensuring town centre vitality through the day and evening. Ensuring that uses contribute to the vitality and attractiveness of the centre throughout the day and evening.
- The activity of the retail frontage. Whether the proposed use will provide an active frontage and maintain the character of the shopping area.
- Where applicable, the length of vacancy of the unit and the efforts to market the unit for its existing permitted use. The need to actively consider a change to alternative use could, in part, be influenced by the length of time that a unit has

remained vacant. In this regard, evidence of marketing the unit for the permitted use will be salient.

- The effect on amenity. Whether the proposed use would give rise to noise, smell or other environmental problems.

7.51 Based upon our review of the town centres in Wiltshire, the centres which should be subject to the secondary frontage policy are:

- Amesbury
- Bradford on Avon
- Calne
- Chippenham
- Corsham
- Devizes
- Downton
- Malmesbury
- Marlborough
- Melksham
- Mere
- Salisbury
- Tisbury
- Trowbridge
- Warminster
- Westbury
- Wilton
- Wootton Bassett

Primary Shopping Areas ('PSA')

7.52 The main purpose of the PSA designation is to guide the operation of the sequential approach in the determination of planning applications for main town centre uses which lie outside of an existing centre and are not in accordance with an up to date development plan. We therefore do not consider that the PSA requires a policy in its own right and instead the PSA is referred to in the policy dealing with the retail development in edge and out of centre locations.

Town Centre Boundary Policy

7.53 We propose the following wording:

> *Subject to the provisions of policies X, Y and Z* [n.b. the primary retail frontage, secondary retail frontage and edge/out of centre policies], *the Council will permit retail, business, leisure, arts, cultural and tourism development within Wiltshire's town centres, as defined on the Proposals Map, provided that the development maintains and enhances the vitality and viability of the town centre and complies with other policies in this Plan.*

7.54 In line with the approach to the primary and secondary frontage policies, there is a need for the town centre boundary policy to be supported by guidance on how to assess whether a proposal maintains and enhances the vitality and viability of the town centre in question. For consistency, it is considered appropriate to adopt the criteria within the secondary frontage policy, as outlined above.

Proposed policy for retail and main town centre use proposals outside of town centres

7.55 We propose the following wording for a policy for retail and main town centre use proposals outside of town centres

> *Proposals for retail and other main town centre uses on sites which lie outside of the defined Primary Shopping Areas must be accompanied by an assessment which meets the requirements of national policy and guidance, and demonstrates that:*
>
> - *For all main town centre uses, the proposal complies with the sequential test. This requires applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. In all circumstances,*

the Council will require applicants to demonstrate flexibility in terms of the scale and format of their proposed development and in the consideration of alternative sites. In relation to edge and out of centre proposals, the Council will give preference to accessible sites that are well connected to nearby town centres.

- *All retail, leisure and office uses over 200sq m gross proposal are required to be accompanied by an impact assessment which assesses:*

  I. *The impact of the proposal on public and private sector investment within centres in the catchment area of the proposal; and*

  II. *The impact of the proposal on town centre vitality or viability, including local consumer choice and trade in the town centre and wider area, including a cumulative assessment of the proposal together with committed and recently completed developments plus developments under construction.*

It is for the applicant to demonstrate compliance with the sequential test and where an application fails to satisfy this test, including the need to demonstrate flexibility, it should be refused. The Council will also refuse planning permission for proposals which are likely to have a significant adverse impact on town centres.

7.56 The supporting text to the Policy should provide the following information:

- *Clarification of the contrasting in-centre and edge of centre definitions for retail and other main town centre uses, as set out in paragraph 56 of this note.*
- *Clarification of the main town centre land use definition, as set out in the Glossary to the NPPF.*
- *Clarification as to the type of proposals which this policy applies – i.e. proposals for new development, changes of use, extensions, variations in planning conditions/legal obligations in relation to net sales area and the range of goods/services to be sold/provided.*

- *Clarification as the information that the Council expects to be provided in relation to the sequential test:*

    i. *The onus of the application to demonstrate compliance with the sequential test – see the NPPG and paragraph 59 above.*

    ii. *The need for flexibility in scale and format – see paragraphs 59 and 65 above, plus the NPPG.*

    iii. *The need for a comprehensive assessment of accessibility and connectivity in relation to edge and out of centre sites, particularly for competing edge and out of centre sites – see paragraph 64 above.*

- *Clarification on the type and extent of information and analysis required by the Council in relation to the assessment of impact.*

- *Confirmation that the Council expects to work in a pro-active manner with applicants during the pre-application stage, including the need to agree a robust scope of supporting information to accompany planning applications.*

Appendix 1: Retail hierarchy assessment

Appendix 2: Existing town centre planning policies in Wiltshire

Appendix 3: Use classes order and permitted development rights

Appendix 4: Convenience goods floorspace capacity assessment

Appendix 5: Comparison goods floorspace capacity assessment

Appendix 6: Study area for capacity assessment

Appendix 7: Site assessments

Appendix 8: extract from Bristol site allocations and development management DPD

Appendix 9: extract from LB Ealing development management DPD

Appendix 10: extract from LB Islington development management DPD

Appendix 11: extract from Mid Devon development management DPD

Appendix 12: extract from New Forest sites and development management DPD

Appendix 13: extract from Wokingham managing development delivery DPD

Appendix 14: extract from Teignbridge Local Plan

Appendix 15: Amesbury town centre plans

Appendix 16: Bradford on Avon town centre plans

Appendix 17: Calne town centre plans

Appendix 18: Chippenham town centre plans

Appendix 19: Corsham town centre plans

Appendix 20: Cricklade town centre plans

Appendix 21: Devizes town centre plans

Appendix 22: Downton town centre plans

Appendix 23: Ludgershall town centre plans

Appendix 24: Malmesbury town centre plans

Appendix 25: Market Lavington town centre plans

Appendix 26: Marlborough town centre plans

Appendix 27: Melksham town centre plans

Appendix 28: Mere town centre plans

Appendix 29: Pewsey town centre plans

Appendix 30: Salisbury city centre plans

Appendix 31: Tidworth town centre plans

Appendix 32: Tisbury town centre plans

Appendix 33: Trowbridge town centre plans

Appendix 34: Warminster town centre plans

Appendix 35: Westbury town centre plans

Appendix 36: Wilton town centre plans

Appendix 36: Wootton Bassett town centre plans