

Issue 11	Thriving Town Centres	
Development Plan reference:	Thriving Town Centres, page 49, para 5.14-5.16 and table 5.4	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
Cockburn Association (037249) Edinburgh Association of Community Councils(040476) Eskbank and Newbattle Community Council (891202) Haddington and District Amenity Society (803807) Liberton and District Community Council (790396)	Midlothian Green Party (778339) Mrs Mirabelle Maslin (928549) Peebles Community Trust (810911) Police Scotland (040584) Roslin and Bilston Community Council (790524) sportsotland (029346) TH Real Estate (035989) The John Lewis Partnership (039926) VisitScotland (029385)	
Provision of the Development Plan to which the issue relates:	Town centres	
Planning Authority's summary of the representation(s):		
<p><u>Cockburn Association (037249)</u> Support the Town Centre proposals. It is important to emphasise the provision of good public transport facilities and adequate car parking, incorporating generous tree / shrub planting.</p> <p>Care needs to be taken to ensure that the sequential approach does not result in large developments in edge of centre sites impacting on viability of local shops and loss or damage of areas of green space.</p> <p>It is helpful that Local Development Plans (LDPs) will be directed to identify a network of other town and commercial centres. Welcome encouragement of an evening economy but should not encourage a night economy.</p> <p><u>Edinburgh Association of Community Councils (040476)</u> Support paragraph 5.15 but this must be backed up by a public transport network that encourages footfall without additional car use and policing and security systems that support local residents, reducing anti-social behaviour.</p> <p>At 5.16 it should be recognised that not all Town Centres may prosper through retail and other commercial uses and early intervention before blight sets in to re-designate areas for housing or mixed use should be encouraged.</p> <p><u>Eskbank and Newbattle Community Council (891202)</u> Strongly support the prioritisation of commercial, leisure and cultural developments</p>		

in town centres and edge of town locations over out-of-town retail centres.

Haddington and District Amenity Society (803807)

Out of centre development damages centres of small towns and villages.

Liberton and District Community Council (790396)

Support policy at paragraph 5.15 but consider that this has implications for residents in the centres hinterland. Policy at paragraph 5.16 must make provision for controls to ensure increased activities in town centres do not impinge on local residents and those in the suburbs who could lose out on policing due to town / centre requirements.

Midlothian Green Party (778339)

Welcomes the support for town centres but expresses difficulty in seeing how they can compete with expanding out of town centres.

Mrs Mirabelle Maslin (928549)

Town centres have been allowed to degenerate. A contributing factor is the preferential development of retail parks. There is nothing in the Proposed Plan that will ensure that regeneration of town centres takes priority over expanding retail parks.

Peebles Community Trust (810911)

Supportive of guidelines and particularly town centre first policy as they are applied to peripheral / rural settlements. This is of even more importance where conservation of Victorian (heritage) town centres is used as the rationale for edge of centre development rather than better integrating such development.

Police Scotland (040584)

The expansion of the night time economy may cause an increase in criminality and Police Scotland Fife Division would require to consider an increase in capacity to deal with higher footfall in these areas.

Roslin and Bilston Community Council (790524)

Town centres have been allowed to degenerate. A contributing factor is the preferential development of retail parks. There is nothing in the Proposed Plan that will ensure that regeneration of town centres takes priority over expanding retail parks. Out-of-town-centre hubs do not provide the accessible facilities residents need.

sportscotland (029346)

Generally support the town centre first approach however consider that for some uses, such as sports facilities and schools, a town centre location may not always be the most appropriate location. A blanket sequential approach in LDPs on all such development may have unintended consequences.

TH Real Estate (035989)

Supports the identification and strategic role of Thriving Town Centres.

Support the Proposed Plan setting out an overarching policy framework at a

strategic level for the determination of application proposals. This will help ensure proposals with cross boundary impacts can be comprehensively considered.

The Proposed Plan should be more explicit in its support for the City Centre at the top of the hierarchy of centres to maintain its importance to the wider City Region. The current wording in the Proposed Plan has weakened the stance in the current Strategic Development Plan (SDP) that placed the city centre at the top of the hierarchy. Specific reference to the St James project should be made to further support investor confidence within the City Centre.

The John Lewis Partnership (039926)

Supportive of vision that Edinburgh should remain the focus for the region's retail and leisure offer. The Proposed Plan should provide strong encouragement to potential investment in the city centre. Should ensure proposals for new retail floor space in out of town locations are restricted where the city centre is not meeting its own targets for the delivery of new floorspace set out in Edinburgh's retail assessment. The Proposed Plan should continue to champion a strong town centre first approach as this is vital to ensuring the right conditions for city centre investment.

Supportive of aspiration to support all town centre uses, not just retail, in the town centre.

Consider that the identification of a specific role of each centre will provide clarity over the nature of retail and other development appropriate in these locations.

VisitScotland (029385)

Tourism is one of the key economic drivers for growth. It is a more specific function than leisure and should be identified separately as a function for city, town and strategic centres.

Modifications sought by those submitting representations:

Cockburn Association (1037249)

Remove 'night' from the last sentence of para 5.15.

Add to para 5.16 'but not if it puts at risk the viability of the existing local shops or removes open space from the community.'

Edinburgh Association of Community Councils (040476)

Paragraph 5.16 should recognise that not all Town Centres may prosper through retail and other commercial uses and early intervention to re-designate areas for housing or mixed use should be encouraged.

Haddington and District Amenity Society (803807)

At paragraph 5.16 - prevent out of centre development in smaller towns and villages.

Roslin and Bilston Community Council (790524)

Express within the Proposed Plan the protection of town centres before retail parks.

Express within the Proposed Plan the need for accessible facilities within town centres.

sportscotland (029346)

Provide a caveat at 5.16. Suggest: 'While SPP outlines a town centre first approach, it is recognised that community and educational facilities should be easily accessible to the communities they serve. Local Development Plans should allow a degree of flexibility to allow the most appropriate siting.' (p49, para 5.16).

TH Real Estate (035989)

Amend bullet points at 5.16 to identify the City Centre as a preferred location before strategic or local centres (p49, para 5.16).

Include within supporting text of Thriving Town Centres reference to the St James project (p49).

The John Lewis Partnership (039926)

Proposed Plan should provide strong encouragement to potential developers to invest in sites that will accelerate the regeneration of the city centre and broaden the choice on offer.

Proposed Plan should ensure that development proposals for new retail development do not seek to compete with the city centre, reduce its attractiveness or its ability to draw in customers from the wider city boundaries. Any development out with the city centre should be seen to support the city centre and complement the services that it offers.

VisitScotland (029385)

At Table 5.4 include tourism as a function for the City Centre, Strategic Centres and Town Centres (p49, Table 5.4).

Summary of responses (including reasons) by Planning Authority:

Cockburn Association (1037249)

Scottish Planning Policy sets out that the planning system should encourage a mix of uses in town centres to support their vibrancy, vitality and viability throughout the day and into the evening (para 60 ASD06). Scottish Planning Policy Annexe A sets out indicators of Health Checks which should be used to develop strategies for town centre improvements, this includes the evening / night-time economy. Within the Proposed Plan the phrase evening / night time economy is intended to describe the period beyond the traditional working day. It is accepted that in line with Scottish Planning Policy, reference to 'evening economy' (and removal of the word 'night') could also be sufficient. **No modifications proposed.**

SESplan disagrees that additional text is required at paragraph 5.16 of the Proposed Plan. Paragraph 5.16 sets out a Town Centre First Policy. The representation is concerned that the policy could be used to locate large developments on edge of centre sites taking business away from town centres and making local shops unviable. The purpose of the Town Centre First Policy is to

direct development which would generate significant footfall to established centres with preference to town centre locations, including local centres before edge of town centre locations. The policy therefore addresses the concern by requiring that town centre sites are considered before edge of centre sites. **No modifications proposed.**

Edinburgh Association of Community Councils (040476)

SESplan disagrees that modification of the Proposed Plan is required to encourage early intervention to re-designate areas of town centres for uses other than commercial or retail. Paragraph 5.15 of the Proposed Plan requires local development plans to support all uses in town centres that generate significant footfall, including offices, community, cultural facilities and opportunities for town centre living. Local development plans will identify town centres. The function of Town Centres is set out at Table 5.4 of the Proposed Plan as a diverse mix of uses including shopping, residential, leisure and evening economy. **No modifications proposed.**

Haddington and District Amenity Society (803807)

SESplan disagree the plan should prevent out of centre development. Paragraph 5.16 of the Proposed Plan sets out a Town Centre First Policy. The purpose of the Town Centre First Policy is to direct development which would generate significant footfall to established centres with preference to town centre locations, including local centres. This requires consideration to be given to town centre locations, including local centres before any other location while accepting that it may not always be possible to locate within a town centre. Scottish Planning Policy paragraph 71 (ASD06) requires that where a retail development with a gross floorspace over 2,500m² is proposed outwith a town centre, contrary to the development plan, a retail impact analysis should be undertaken. Out-of-centre locations should only be considered for uses which generate significant footfall where: all town centre, edge of town centre and other commercial centre options have been assessed and discounted as unsuitable or unavailable; the scale of development proposed is appropriate, and it has been shown that the proposal cannot reasonably be altered or reduced in scale to allow it to be accommodated at a sequentially preferable location; the proposal will help to meet qualitative or quantitative deficiencies; and there will be no significant adverse effect on the vitality and viability of existing town centres. Local development plans will identify town and local centres within their area and set out appropriate retail policy. **No modifications proposed.**

Liberton and District Community Council (790396), Police Scotland (040584)

SESplan disagree that modification is required. Policing is not a matter which can be set out in a Strategic Development Plan. **No modifications proposed.**

Roslin and Bilston Community Council (790524)

SESplan disagree that modification is necessary to protect town centres before retail parks. Paragraph 5.16 of the Proposed Plan sets out a Town Centre First Policy. The purpose of the Town Centre First Policy is to direct development which would generate significant footfall to established centres with preference to town centre locations, including local centres. This requires consideration to be given to town centre locations, including local centres before any other location, including

commercial centres. **No modifications proposed.**

SESplan disagree that the Proposed Plan should be modified to express the need for accessible facilities within town centres. Paragraph 5.15 of the Proposed Plan requires local development plans to support all uses in town centres that generate significant footfall including community facilities. The Town Centre First policy set out at paragraph 5.16 of the Proposed Plan requires that uses generating high footfall should consider in the first instance town centre locations. These requirements should ensure that where possible such uses are located within town centres while accepting that it may not always be possible to locate within a town centre. **No modifications proposed.**

sportscotland (029346)

SESplan disagree that the Proposed Plan should state that flexibility is required in applying the Town Centre First policy set out at paragraph 5.16 of the Proposed Plan. The Town Centre First policy sets out a sequential approach, to be applied by local development plans, to locating uses that generate significant footfall. In applying the sequential approach Scottish Planning Policy, paragraph 69 requires a flexible approach to ensure that different uses are developed in the most appropriate locations and states that it is important that community, education and healthcare facilities are located where they are easily accessible to the communities that they are intended to serve. The Town Centre First policy set out at paragraph 5.16 that uses generating high footfall should consider in the first instance town centre locations. These requirements should ensure that where possible such uses are located within town centres while accepting that it may not always be possible to locate within a town centre. **No modifications proposed.**

TH Real Estate (035989)

SESplan disagree that the City Centre should be separately identified as the preferred location within the Town Centre First Policy. The Town Centre First Policy set out in paragraph 5.16 of the Proposed Plan reflects the sequential approach set out in paragraph 68 of Scottish Planning Policy. This identifies town centres, local centres and city centres as the preferred location for high footfall generating development. A hierarchy of centres is set out at Table 5.4 of the Proposed Plan. It identifies the City Centre and Strategic Centres. Paragraph 5.14 of the Proposed Plan states that the City Centre is the regional core. Table 5.4 of the Proposed Plan identifies four Strategic Centres providing functions at sub-regional level. The Strategic Centres support a wide geographical area. It would not be appropriate to require that local development plans within the region should set out a sequential approach which considered the City Centre to be a preferential location over town centres, strategic centres or local centres. **No modifications proposed.**

SESplan disagree that reference to the St James project should be included within the supporting text of Thriving Town Centres. SESplan acknowledge the importance of the project however the purpose of this section of the plan is to set out the approach for local development plans. It would not be appropriate to focus on a single development. **No modifications proposed.**

The John Lewis Partnership (039926)

SESplan disagree that the Proposed Plan requires to be modified to encourage investment in the City Centre. The Proposed Plan sets out a vision for growth which should provide confidence in the investment potential of the region. It identifies a Central Business Cluster in the City Centre. Paragraph 5.16 of the Proposed Plan sets out a Town Centre First policy which sets out a sequential approach, to be applied by local development plans, to locating uses that generate significant footfall. This identifies the city centre, along with Local, Strategic and Town Centres as the preferred location for development generating significant footfall. Table 5.4 sets out a hierarchy of centres. Paragraph 5.16 requires local development plans to identify a network of centres taking account of the hierarchy and explain how they can complement each other. **No modifications proposed.**

VisitScotland (029385)

SESplan disagree that Table 5.4 should separately identify tourism as a function for the City Centre, Town and Strategic Centres. Table 5.4 identifies the function of the City Centre, Strategic Centres and Town Centres as including a diverse mix of uses and sets out what these include. It does not provide a comprehensive listing of all uses which could contribute to this mix. SESplan acknowledges the importance of tourism to the City Centre, Town Centres and Strategic Centres however it is considered that tourism could be an element of a number of those uses listed. **No modifications proposed.**

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

[Note: For DPEA use only.]