Threshold Policy for Main Town Centre Uses Impact Test

Evidence and Justification Report

Sefton Council

October 2015

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Document Control

Project:	Sefton Threshold Policy for Main Town Centre Uses Impact Test
Client:	Sefton Council
Job Number:	A092547
File Origin:	T:\Job Files - Manchester\A092547 - Sefton Local Centre

Document Checking:

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Issue	Date	Status
1	02/09/15	Draft
2	13/10/15	Final
3		

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1.0 Introduction

1.01 WYG has been instructed by Sefton Council to assess the floorspace thresholds for planning applications for main town centre uses (specifically including retail and leisure uses) above which an impact assessment is required. This report sets out the policy context, methodology, analysis and justification for the thresholds set out in Policy ED2 of the Sefton Local Plan.

2.0 Context and Policy Background

1.02 The National Planning Policy Framework (NPPF) (2012) sets out the Government's overarching planning approach to town centres. Within this it is made clear that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres in order to ensure their continued vitality and viability (paragraph 23). Town centres should be recognised as being at the heart of their communities and as such, local planning authorities should require 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 (paragraph 24).

1.03 Paragraph 26 of the NPPF states that:

> *'When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq.m). This should include assessment of:*
>
> - *The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
> - *The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full*

impact should also be assessed up to ten years from the time the application is made.'

1.04 It is therefore important to consider whether local floorspace thresholds should be set within Sefton and if so what these thresholds should be.

1.05 The NPPF provides no further detail regarding local thresholds, however, the National Planning Practice Guidance (NPPG) (2014) does. Paragraph 13 of the 'Ensuring the vitality of town centres' section provides further detail regarding the impact test and states that:

'The purpose of the test is to ensure that the impact over time (up to five years (ten for major schemes)) of certain out of centre and edge of centre proposals on existing town centres is not significantly adverse. The test relates to retail, office and leisure development (not all main town centre uses) which are not in accordance with an up to date Local Plan and outside of existing town centres. It is important that the impact is assessed in relation to all town centres that may be affected, which are not necessarily just those closest to the proposal and may be in neighbouring authority areas.'

1.06 Paragraph 16 provides guidance in relation to floorspace thresholds and states:

'The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace unless a different locally appropriate threshold is set by the local planning authority. In setting a locally appropriate threshold it will be important to consider the:

- *Scale of proposals relative to town centres*
- *The existing viability and vitality of town centres*
- *Cumulative effects of recent developments*
- *Whether local town centres are vulnerable*
- *Likely effects of development on any town centre strategy*
- *Impact on any other planned investment'*

1.07 It is considered that a blanket threshold is unsuitable for all types of centre across an administrative area. For example, a 500 sq.m convenience store (which could be operated by

Tesco Express or Sainsbury's Local) will have a greater impact on a local centre than a similar facility would on Southport or Bootle town centres. Therefore, in developing a threshold policy it is more appropriate to have a range of thresholds, depending upon which centre the development applies to. Accordingly, policy should advocate a tiered approach whereby the threshold applied to planning applications at edge-of-centre and out-of-centre locations varies in relation to the role and function of the particular centre.

1.08 In terms of the hierarchy of centres in Sefton, Policy ED2 of the emerging Local Plan defines the following:-

Town Centres: Bootle and Southport

District Centres: Crosby, Formby, Maghull and Waterloo

Local Centres: Ainsdale, Birkdale, Churchtown, Netherton and Old Roan

1.09 Policy ED2 goes on to set out the floorspace thresholds that will apply to applications for retail, leisure and other town centre uses proposed outside of existing defined centres. It states that:-

- *"outside of the Primary Shopping Areas of Bootle and Southport, an impact assessment will be required for development which proposes more than 500 sq.m gross floorspace or more;*
- *within 800 metres of the boundaries of the district centres, an impact assessment will be required for development which proposes more than 300 sq.m gross floorspace; and,*
- *within 800 metres of the boundaries of the local centres, an impact assessment will be required for development which proposes more than 200 sq.m gross floorspace."*

1.10 The policy goes on to clarify that:-

"Where more than one impact threshold applies, the lower impact threshold will take precedence. Where appropriate, impacts on the vitality and viability of designated retail centres in neighbouring local authorities will also be required to be assessed.

Subject to the above, impact assessments may also be required in other circumstances, including where a change of use from one form of retail development to another is proposed."

3.0 Methodology

3.01 For the purpose of this report, a methodology had been devised for assessing the appropriate threshold level to be applied to the retail centres. This is based on the guidance set out in the NPPG and brings together relevant information relating to each of the centres. Against this evidence base, a judgement is then made on the appropriate thresholds for each tier of centre.

3.02 Although the characteristics of each centre are unique, and therefore the potential impacts of the same development could affect two centres of the same tier in different ways, it was considered that a single threshold should apply to each tier rather than to centres individually. The main reason for this decision was simplicity and clarity but also to account for changes within individual centres throughout the lifetime of the plan.

3.03 The following information has been obtained for each centre:-

- total floorspace for each main town centre use;
- the floor areas of each unit for different types of town centre uses;
- details of main town centre use planning applications in the borough over the previous five years;
- the scale of existing out of centre retail development;
- the 'health checks' for each centre with indicators of viability and vitality;
- any town centre strategies; and
- details of any other planned investment.

3.04 The floorspace data was collected in order to understand the scale of the centres and the mixes of floorspace uses within them given that certain types of use are considered more likely to pose a threat to town centre vitality and viability when located edge or out of centre. Such uses more likely to pose a threat comprise convenience retail, comparison retail and leisure uses. It is considered unlikely that there will be significant pressure for edge or out of centre retail service or financial and professional service uses, either in terms of unit size or total floorspace. This is due to the trading characteristics of such uses. For example, it is unlikely that a hairdresser of 1,000 sq.m would exist, although a convenience retail, comparison retail or leisure use of that size would be likely.

3.05 Data regarding the distribution of unit sizes was obtained to understand about the scale of 'anchors'[1] in the centres and the composition of the centres. Planning history and existing out of centre retail information was obtained to understand about the pressure for out of centre development and out of centre competition. Health checks, information about town centre strategies and details of planned investment were obtained in order to understand how the centres may cope with further out of centre competition or how vulnerable they would be to change.

4.0 Analysis

Centres' Floorspace Analysis

4.01 Table 4.1 shows the total average floorspace in each tier of centre broken down in to the different use categories (as categorised by 'Goad'); shown in both sq.m and as percentages.

4.02 As an example of how the figures were calculated, the convenience floorspace figure of 14,402 sq.m for the town centres is derived from the total amount of convenience floorspace in Southport (16,930 sq.m) and Bootle (11,873 sq.m) divided by the number of centres in that tier, which in this example is two. The convenience percentage figure shows this as a proportion of the total average floorspace in this tier of centre, i.e. 100,671 sq.m.

[1] Retailers which help to pull shoppers to particular centres, increasing footfall and 'spin-off' benefits to other retailers

Table 4.1 - Total Average Floorspace by Centre Tier and Use

	Town	Town	District	District	Local	Local
	sq.m	%	sq.m	%	sq.m	%
Convenience	14,402	14%	4,189	21%	1,492	21%
Comparison	37,148	37%	5,031	26%	2,022	29%
Retail Service	4,924	5%	2,431	12%	1,110	16%
Leisure Services	21,958	22%	4,749	24%	1,453	21%
Financial and Business Services	7,003	7%	1,736	9%	558	8%
Vacant	15,238	15%	1,451	7%	324	5%
TOTAL	**100,671**	**100%**	**19,587**	**100%**	**6,958**	**100%**

Source: WYG Health Check data 2015 and 2012

4.03 Table 4.1 shows the large difference in total scale of centres between each of the tiers, as one would expect. It also demonstrates the greater reliance on convenience retailing and retail service provision (such as hairdressers, dry cleaners, and Post Office's) in the district and local centres. This would be expected as the focus of smaller, more local centres is on meeting people's day to day needs. In contrast, the town centres have a greater proportion of comparison retailers. The results also show that the town centres have a greater proportion of vacant units which suggests that they are more vulnerable to out of centre competition.

Convenience Floorspace

4.04 Table 4.2 shows the numbers of units falling within each size category for convenience retailers averaged for each tier of centre.

4.05 In this table, for example, the number of units below 200 sq.m in each of the town centres (Southport and Bootle) were counted and averaged to give the average count figure of 24.5 units under 200 sq.m in the town centres. In a similar way, the proportion of units in each centre under 200 sq.m were averaged to provide a percentage figure 0f 70%.

Table 4.2 - Average Convenience Retail Unit Size

sq.m	Town Count	Town %	District Count	District %	Local Count	Local %
<199	24.5	70%	8.5	72%	6.8	77%
200-299	2.0	6%	0.5	4%	0.2	2%
300 - 499	2.5	10%	1.0	8%	0.8	16%
500 - 999	1.5	5%	0.8	6%	0.2	2%
1,000 - 1,499	0.5	1%	-	0%	-	0%
>1,500	2.5	8%	1.0	10%	0.2	2%
	34	**100%**	**12**	**100%**	**8**	**100%**

Source: WYG Health Check data 2015 and 2102

4.06 The table shows that the smaller the centre the greater the proportion of smaller units (i.e. those which are less than 199 sq.m). The town and district centres have roughly the same level of larger units (above 500 sq.m). These larger retailers would represent anchors to the centres and therefore the loss of such an anchor would potentially put the centre at risk of decline. The table further shows the relatively low numbers of retailers selling convenience goods in the local centres with an average of only 1.4 convenience retailers with units of over 200 sq.m floorspace. The overall findings are summarised in Table 4.3 which shows the average convenience retail unit sizes in each tier of centre.

Table 4-3 - Average convenience unit size in each tier of centre

sq.m	Town	District	Local
Average	489	364	192

Source: WYG Health Check data 2015 and 2012

Comparison Floorspace

4.07 Table 4.4 shows the numbers of units falling within each size category for comparison retailers averaged for each tier of centre. As with the convenience floorspace, this shows that the smaller the centre the greater the proportion of smaller units.

4.08 The table also shows that none of the local centres have comparison goods retailers with more than 1,000 sq.m of floorspace and the district centres only average 1% above this size. Further the local and district centres only average 11% of comparison goods units exceeding 300 sq.m in size; for units above 200 sq.m for the district centres this increases to 20% whereas the local centres remain low at 14%. This suggests that significant out of centre development for comparison goods could affect the relatively small number of comparison units in centre which act as anchors. In terms of the district and local centres, comparison anchors could be considered to be those with unit sizes exceeding 200 – 300 sq.m.

Table 4.4 - Average Comparison Retail Unit Size

sq.m	Town Count	Town %	District Count	District %	Local Count	Local %
<199	120.5	69%	29.8	80%	10.2	85%
200-299	16.5	12%	3.3	9%	0.6	3%
300 - 499	14.0	10%	2.0	7%	0.6	5%
500 - 999	5.5	5%	1.0	3%	1.2	6%
1,000 - 1,499	3.5	3%	0.3	1%	-	0%
>1,500	4.0	2%	-	0%	-	0%
TOTAL	**164**	**100%**	**36**	**100%**	**13**	**100%**

Source: WYG Health Check data 2015 and 2012

4.09 Comparison retail is more important to the town centres and it is not therefore surprising that they benefit from a greater distribution of unit sizes. An average of 10% of units in the town centres are greater than 500 sq.m, with 2% exceeding 1,500 sq.m. A comparison anchor in the town centre would therefore considered to be around 500 sq.m.

4.10 Table 4.5 shows the average unit size for comparison goods in each tier of centre. The average sizes are relatively low and this is as a result of the overall bias towards the high proportion of smaller units.

Table 4.5 Average comparison unit size in each tier of centre

sq.m	Town	District	Local
Average	246	159	141

Source: WYG Health Check data 2015 and 2012

Other Town Centre Use Floorspace

4.11 Similar analyses were carried out for other town centre uses; retail service (such as health and beauty, dry cleaning, photo processing, travel agents and post offices), leisure services (pubs, restaurants, cafes, take away's, betting offices and cinemas) and financial and professional services (such as banks, solicitors, and accountants).

4.12 Table 4.6 shows an assessment of retail service unit sizes averaged for each tier of centre. This shows a very strong trend in small sized units for such uses across all tiers of centres.

The average sizes (Table 4.7) are broadly consistent across all tiers of centres at around 100 sq.m.

Table 4.6 – Average retail services unit size

	Town	Town	District	District	Local	Local
	Count	%	Count	%	Count	%
<199	52.5	92%	21.8	93%	10.4	94%
200-299	-	6%	0.3	1%	0.6	4%
300 - 499	2.0	2%	1.0	5%	0.2	1%
500 - 999	0.5	0%	-	0%	0.2	1%
1,000 - 1,499	-	0%	0.3	1%	-	0%
>1,500	-	100%	-	0%	-	0%
TOTAL	**55**	**200%**	**23**	**100%**	**11**	**100%**

Source: WYG Health Check data 2015 and 2012

Table 4.7 – Average retail services unit size in each tier of centre

sq.m	Town	District	Local
Average	105	105	91

Source: WYG Health Check data 2015 and 2012

4.13 Table 4.8 similarly shows an assessment of leisure service unit sizes averaged for each tier of centre. This shows that the town centres have a much larger distribution of unit size with an average of 1.5 units exceeding 1,500 sq.m in size. In contrast, none of the district or local centres have leisure service units which are above 1,000 sq.m in size. Notwithstanding this, the total average unit sizes, as shown in Table 4.9, do not vary significantly between the differing tiers of centres and surprisingly the average unit size in the local centres is slightly larger (8 sq.m) than those of the district centres.

Table 4.8 – Average leisure services unit size

	Town	Town	District	District	Local	Local
	Count	%	Count	%	Count	%
<199	74.5	68%	28.0	81%	8.2	86%
200-299	13.5	13%	4.0	11%	0.4	3%
300 - 499	9.5	11%	1.5	6%	0.8	7%
500 - 999	5.0	5%	0.8	2%	0.4	5%
1,000 - 1,499	0.5	0%	-	0%	-	0%
>1,500	1.5	2%	-	0%	-	0%
TOTAL	**105**	**100%**	**34**	**100%**	**10**	**100%**

Source: WYG Health Check data 2015 and 2012

Table 4.9 – Average leisure services unit size in each tier of centre

sq.m	Town	District	Local
Average	172	136	144

Source: WYG Health Check data 2015 and 2012

4.14 Table 4.10 provides information regarding the unit size distribution for financial and professional service uses. This shows that in relation to all tiers of centres, the distribution of unit size is limited and units are generally small in scale. No units exceed 1,000 sq.m in the town centres, 500 sq.m in the district centres and 300 sq.m in the local centres. The town centres do however benefit from a wider range of unit size in financial and professional services with only 76% of units falling below 200sq.m compared to 97% in the local centres. This is reflected in the total average unit sizes as shown in Table 4.11 with average sizes of 156 sq.m in the town centres, 124 sq.m in the district centres and 98 sq.m in the local centres.

Table 4.10 - Average financial and professional service use unit size

	Town	Town	District	District	Local	Local
	Count	%	Count	%	Count	%
<199	28.0	76%	11.5	83%	5.6	97%
200-299	4.5	12%	2.0	14%	0.2	3%
300 - 499	3.0	9%	0.5	4%	-	0%
500 - 999	1.5	3%	-	0%	-	0%
1,000 - 1,499	-	0%	-	0%	-	0%
>1,500	-	0%	-	0%	-	0%
TOTAL	**37**	**100%**	**14**	**100%**	**6**	**100%**

Source: WYG Health Check data 2015 and 2012

Table 4.11 - Average financial and professional service use unit size in each tier of centre

sq.m	Town	District	Local
Average	156	124	98

Source: WYG Health Check data 2015 and 2012

4.15 In summary, the floorspace analysis has indicated that-

- the smaller the centre the smaller the average unit size;
- on average comparison units are smaller than convenience units;

- on average retail service, leisure service and financial and professional service units are smaller than convenience and comparison retail units with retail service uses on average occupying the smallest units in the centres;
- convenience units over 500 sq.m are considered to anchor all tiers of retail centres,
- comparison units over 200 – 300 sq.m are considered to anchor district and local centres, whereas comparison units over 500 sq.m are considered to anchor town centres;
- leisure uses over 500 sq.m are considered to anchor the town centres (these include sports and leisure facilities, theatres and concert halls and multiple-retailer public houses) and around 200-300 sq.m in relation to the district and local centres (these typically include restaurants and public houses); and
- the smaller the centre the lower the number of anchors there are present.

4.16 Developing these points further, it stands to reason that the smaller the centre the more vulnerable they could be to smaller-scale out of centre retail. This is because smaller centres generally comprise smaller units and, since 'like competes with like', a small-scale out of centre development would more likely compete directly with similar sized in centre units. Further, since smaller centres comprise less overall floorspace, the impact of any out of centre development would be spread amongst fewer retailers resulting in a greater impact. For these reasons it is considered that lower tier centres should have lower threshold levels than the larger centres.

Out of Centre Development Pressure

4.17 In order to assess existing and historic patterns for out of centre development, information has been gathered regarding the location, size, planning restrictions and occupiers of existing out of centre retail units and records of approved planning applications for out of centre retail developments were collated.

Existing out of centre retailing

4.18 Table 4.12 shows the details of existing out of centre retail parks; it does not provide information relating to stand-alone retail units for which information was not readily available. These are shown in relation to Southport and Bootle town centres only. In reality, the edge and out of centre retail units will compete with retailers in lower tier centres too. However, the varying catchment areas would overlap and as such to aid simplicity they have been shown in relation to the top tier centres within Sefton only. The out of centre retail units are more likely to directly compete with the top tier centres given that they are higher order centres (i.e. they contain fewer day to day goods and more one-off purchase products as well as higher quality retailers).

4.19 The findings show that there is around 50,600 sq.m of out of centre retail competing with Southport town centre and a similar amount of 52,800 sq.m competing with Bootle. Much of this floorspace is unrestricted, 'open' A1, meaning that any goods can be sold, including those typically sold from town centres. The Kew Retail Park is the only one that is largely restricted to 'bulky' goods (i.e. household appliances, furniture etc). The level of edge and out of centre floorspace affecting Southport represents around one third of its in-centre floorspace. For Bootle however, the competing amount of edge and out of centre floorspace is around the same level as its in-centre floorspace, which is a significant amount.

Table 4.12 – Out of centre retail parks

Name	Size sq.m	Occupiers	Restriction	Category
North Sefton				
Southport				
Central 12 Shopping Park	15,300	Asda, Next, Outfit, Boots, Sport Direct, Costa, The Range, Poundworld, Card Factory, Bathstore, 99p Stores, Mountain Warehouse.	Open A1	Out-of-Centre
Kew Retail Park	5,000	Poundstretcher and Sofaworks	A1 (Bulky Goods)	Out-of-Centre
Meols Cop Retail Park	18,000	Homebase, Harveys, Currys, Home Bargains, Argos, Dreams, Halfords, Topps Tiles and Aldi.	A1 - Part Open A1 Non Food Part Restricted	Out-of-Centre
Ocean Plaza Retail and Leisure Park	12,300	Matalan, Brantano, Dunelm, Instore, Pets At Home, PoundStretcher	A1 - Open, Non-Food	Out-of-Centre
Sub Total	**50,600**			
South Sefton				
Bootle				
Aintree Retail Park	27,500	B&Q, Ultimate Outdoors, Mothercare, Marks & Spencer, Next, Boots, Hobbycraft, Halfords, Harveys, Topps Tiles, Pets at Home, ScS, DFS	A1 - part open, part restricted	Out-of-Centre
Aintree Racecourse Retail Park	14,700	Currys, PC World, American Golf, Maplin, TK Maxx, JD Sports, Next, Laura Ashley, Wren, Benson for Beds, The Carphone Warehouse, O2, The Carpet Co	A1 - Restricted	Out-of-Centre
Cavenidsh Retail Park	8,500	Sainsbury's, Poundstretcher, Thomas Cook and Next Clearance	A1 - Open, Non-Food	Out-of-Centre
Stone Dale Retail Park	2,100	Iceland, Poundstretcher, Superdrug, Card Factory, Motorworld	A1 - Open with potential	Out-of-Centre
Sub Total	**52,800**			
Total	**103,400**			

Source: Completely Retail 2015

4.20 Since Bootle forms part of the wider Merseyside conurbation however, the relationship of this edge and out of centre retail to Bootle town centre is more difficult to define, i.e. it could equally be described as representing Liverpool city centre's out of centre floorspace. Indeed, the degree of out of centre retail floorspace should be used with some caution for this very reason. Further, given that Bootle is situated within close proximity of a number of other centres of differing sizes, including Liverpool city centre, it is noteworthy that it faces competition from a number of sources which comprise both in-centre retail and edge/ out-of centre retail, although it is acknowledged that planning policy is supportive of in-centre retail development.

4.21 Although to a degree the same could be said of Southport, Southport is more remote, is more self-contained and appeals to tourists in addition to local residents resulting in its own catchment area to a larger degree. The edge and out of centre retail in Southport will therefore have a more direct impact on the town centre.

Retail Planning History

4.22 Appendix 1 contains Table 4.13 which provides details of approved major planning applications in Sefton for retail development since 2007; unfortunately similar information for withdrawn or refused applications was not available (Table 4.14 in Appendix B lists relevant withdrawn or refused applications but this does not include a breakdown of the floorspace or an analysis as to the reasons for the withdrawal or refusal).

4.23 The table shows that all but seven of the 34 planning applications were for out of centre development. Of the 34 applications, four related to convenience retail uses; of which all were out of centre proposals. Two of these related to Formby, one to Southport and one to Bootle.

4.24 Seven of the applications proposed comparison retail developments outwith Southport town centre, whereas 17 related to out-of-centre comparison development within South Sefton; 14 in Bootle, two in Crosby and one in Netherton.

4.25 The average gross retail floorspace for convenience development was 454 sq.m; 371 sq.m net. The averages for comparison retail were 780 sq.m gross and 577 sq.m net.

4.26 Crosby experienced a significant number of in-centre (four) and edge of centre (one) approvals. There was an edge of centre approval in Southport and a major application in Bootle town centre to reconfigure the shopping centre.

4.27 In summary, the out of centre retail analysis has indicated that-

- Bootle experiences the greatest pressure from out of centre retail development in terms of existing floorspace and development pressure;
- Southport also experiences significant pressure from out of centre retail;
- Formby and Crosby have experienced out of centre retail development but not of a significant scale;

- Major applications have been submitted for retail developments within the centres of Bootle, Crosby and Maghull. These could potentially lead to improvements in these centres to assist in combating competition from out of centre retail units.

Vulnerability of the centres

Vitality and Viability

4.28 Health checks for the town centres and the district centres have recently been updated. The latest available health checks for the local centres date from 2011 and therefore the summaries below should be used with some caution. The full health checks are located in the Sefton Retail Strategy Review 2015.

4.29 The health of the each of the centres can be summarised as follows:-

- **Southport** – Generally vital and viable but with some indications of vulnerability – Attractive town with high quality environment, signs of recent investment in units and public realm, good representation of multiple retailers, strong sense of safety and security in most locations. The vacancy rate is however above the average and rents have recently declined with market confidence not as it could be. The Victorian canopies present maintenance issues and some detract from the centre. The town's two Conservation Areas are 'at risk'.
- **Bootle** – Showing signs of decline – Footfall, comparison retail representation and rental values and confidence levels of potential occupants have fallen significantly in recent years suggesting that Bootle is a vulnerable centre. There has been some investment in the environment in recent years however there remains issues with 'blank' frontages and a lack of overlooking in some parts of the centre.

- **Crosby** – Showing signs of vitality and viability – Strong mix of national and independent retailers, good representation of convenience shopping, benefits from a market and an attractive environment. Since 2011 there has been an increase of retail and leisure businesses.
- **Formby** – Showing signs of vitality and viability – Formby has a particularly strong representation of national operators; although a high proportion of these are charity

shops. Very low vacancy rate; lower than 2011. Very good environmental quality with a strong sense of character.

- **Maghull** – Showing signs of decline - Healthy levels of pedestrian activity but generally the centre is poorly maintained. The Central Square Shopping Centre has recently changed hands and yields have increased significantly since the last transaction in 2006 indicating poor performance. There is a large proportion of vacant floorspace in the centre (though not in relation to the number of units) and four convenience retailers have been lost since 2012.
- **Waterloo** – Showing signs of vitality and viability – Few national retailers with a high representation of retail services (such as hairdressers and beauty salons) and leisure uses (such as pubs and restaurants), but low representation of convenience retailers. Significant drop in vacant units since 2011. Healthy level of footfall but poor pedestrian environment.

- **Ainsdale -** Showing signs of vitality and viability
- **Birkdale -** Showing signs of vitality and viability
- **Churchtown -** Showing signs of vitality and viability
- **Netherton -** Showing signs of vitality and viability
- **Old Roan -** Showing signs of vitality and viability
- **Seaforth -** Showing signs of decline

4.30 To summarise the findings of the health checks, in terms of the town centres, Bootle is considered particularly vulnerable to further edge or out of centre development and whilst Southport is generally vital and viable, it does display some vulnerabilities. Therefore, a threshold lower than the nationally set level of 2,500 sq m would be beneficial. The same principles would apply to the district centres. Whilst the local centres on the whole are performing well, these health checks are now dated and should be used with caution.

Town Centre Strategies and Investment

4.31 WYG has identified the following in terms of strategies and planned investments:-

- **Southport** – major initiatives are in place in Southport to bring about change; to increase footfall and spend and to drive economic growth and the visitor economy. To achieve and deliver this, a Development Strategy is being produced for Sefton Council with the support of Southport Business Improvement District (BID) group (Southport BID is an independent organisation that represents more than 900 businesses in Southport town centre). This will identify key development opportunity sites as well as management initiatives, such as signage, public realm and events, to bring about positive change.

- **Bootle –** The New Strand Shopping Centre was purchased by new owners, Ellandi, in October 2014. The new owners are progressing with plans to revitalise areas of the shopping centres in the hope of bringing in new retailers.
- **Maghull –** Planning permission was achieved in 2011 for alterations for the refurbishment, redevelopment and remodelling of parts of the Central Square Shopping Centre. It is understood that this consent was not implemented. The centre was acquired by new owners, Evolve Estates, in July 2015 so there is a possibility that such improvements could be considered again.

4.32 The existence of investment plans and strategies for change on the one hand could be considered positive in terms of their potential to improve vitality and viability of centres, meaning they become less susceptible to change. However, until such plans are implemented, it is a requirement of the impact test to consider the likely effects of any proposed edge or out of centre development on the potential for in-centre plans to come forward.

5.0 Summary and Conclusions

5.01 The NPPF promotes the role of town centres as the heart of communities and requires that their vitality and viability are protected and enhanced. In doing so, the NPPF requires applications for edge and out of centre development that are not in accordance with an up to date development plan, to be supported by impact assessments where their size exceeds the relevant threshold. The NPPF sets a national threshold of 2,500 sq.m, however, local planning authorities are able to set their own thresholds. Sefton Council have proposed the following thresholds within the submitted Sefton Local Plan:-

Centres	Criteria	Threshold (Gross floorspace sq.m)
Bootle and Southport	Outside Primary Shopping Areas	500
District centres	Within 800 metres of the boundaries	300
Local centres	Within 800 metres of the boundaries	200

5.02 In accordance with guidance set out in the NPPG, this report has analysed data from a number of sources in forming a view on the appropriateness of the proposed threshold levels. Overall it is considered that the thresholds are suitable and appropriate for the reasons set out below.

Town Centres

- Anchor units are considered to represent units of 500 sq m and above in terms of convenience and comparison retailers and leisure uses. There are relatively few units of this size and to lose an occupier of that scale could have a significant adverse impact on the centres.
- The average convenience retail unit size is 489 sq m, for comparison it is 246 sq m. Average leisure use unit sizes are 172 sq.m.
- The town centres experience significant competition from edge and out of centre development, with applications for further development averaging 784 sq m gross for convenience and 1,028 sq m gross for comparison development.
- The health checks indicate that Bootle is particularly vulnerable to further competition and whilst Southport is generally vital and viable, it does display some vulnerabilities.
- As a whole, a threshold of 500 sq m, whilst significantly below the national threshold, is considered appropriate as it reflects the proportions and size compositions of the centres, it reflects the size of competition from edge and out of centre developments and it is low enough to account for the vulnerabilities of the town centres whilst providing sufficient freedom for smaller developments to escape the need for impact tests.

District Centres

- Unit sizes of 500 sq m for convenience retailers are considered to anchor the centres. For comparison retailers and leisure uses this figure is 200 – 300 sq m.
- The average convenience retail unit size is 364 sq m, for comparison it is 159 sq m and for leisure 136 sq.m.
- The district centres are considered to experience some edge and out of centre development pressure.
- The health checks indicate that some centres are declining.
- As a whole, a threshold of 300 sq m, is considered appropriate as it reflects the proportions and size compositions of the district centres, as well as their vulnerability for further decline, without being too onerous.

Local Centres

- Unit sizes of 500 sq m for convenience retailers are considered to anchor the local centres. For comparison retailers and leisure uses this figure is 200 – 300 sq m.
- On average the local centres have around one – two convenience anchors and two to three comparison anchors, such that the loss of one reasonably small retailer could have a big impact on the 'health' of the centre.
- The average convenience retail unit size is 192 sq m, for comparison it is 141 sq m and for leisure 144 sq.m.
- The local centres would be more susceptible to smaller edge and out of centre development, suggesting a lower threshold is appropriate.
- As a whole, a threshold of 200 sq m, is considered appropriate as it reflects the proportions and size compositions of the local centres, without being too onerous.

5.03 In summary, this report sets out the policy context, methodology, analysis and justification for the thresholds set out in Policy ED2 of the Sefton Local Plan. It has considered the criteria set out in the NPPG and assessed information relative to each tier of centre in relation to that criteria which are as follows:-

- Scale of proposals relative to town centres
- The existing viability and vitality of town centres

- Cumulative effects of recent developments
- Whether local town centres are vulnerable
- Likely effects of development on any town centre strategy
- Impact on any other planned investment

5.04 It is concluded that the threshold levels proposed are appropriate. The levels proposed, whilst significantly below the national threshold, are considered appropriate as they reflect the proportions and size compositions of the centres, they reflect the size of competition from edge and out of centre developments and they are low enough to account for the vulnerabilities of the town, district and local centres whilst providing sufficient freedom for smaller developments to escape the need for impact tests. The thresholds reflect that, in our experience, it will only generally be development of a scale greater than these thresholds which could lead to a 'significant adverse' impact, resulting in the refusal of an application for town centre uses in accordance with the provisions of paragraph 26 of the NPPF.

Appendices

Appendix A – Table 4.13

Table 4-13 – Retail planning history

Convenience Applications

Reference	Location	Proposal	Gross Additional Retail Floorspace	Net Additional Convenience Retail Floorspace	Category
North Sefton					
Formby					
S/2011/0103	Fmr Lighthouse Public House, 98 Liverpool Road Formby L37 6BS	Erection of 2 storey convenience store	N/A	372	Out-of-Centre
S/2010/1645	Shell Garage, Liverpool Road, Formby L37 6BT	Construction of new PFS including erection of convenience store	273	191	Out-of-Centre
Southport					
DC/2014/00045	Aldi, 8 Meols Cop Centre, Foul Lane, Southport	Single storey extension.	N/A	466	Out-of-Centre
South Sefton					
Bootle					
S/2010/1157	Premises and land at Orrell Road, Bootle	Demolition of 938 sq.m foodstore and replacment with 1,575 sq.m Netto foodstore	634	456	Out-of-Centre
Total			**907**	**1,486**	
		Average	**454**	**371**	

Comparison Applications

Reference	Location	Proposal	Gross Additional Retail Floorspace	Net Additional Comparison Retail Floorspace	Category
North Sefton					
Southport					
S/2013/0619	Unit 1A, Meols Cop Retail Park, Southport	Change of use of existing unit to Retail (A1) elevations to create two new units and creation of new mezzanine floorspace	N/A	766	Out-of-Centre
S/2011/0637	Unit 4, Meols Cop Retail Park	Construction of a mezzanine floor	534	422	Out-of-Centre
S/2009/0671	Unit 6, Meols Cop Retail Park, Southport	Construction of a mezzanine floor	929	669	Out-of-Centre
N/2008/0854	Unit 7, Meols Cop Retail Park, Southport	Installation of Mezzanine Floor	1,858	1,338	Out-of-Centre
S/2011/0204 (formerly N/2(	Teardrop site, Central 12 Retail Park, Southport	Erection of 5 retail units, 4 as A1	617	355	Edge-of-Centre
N/2007/0960	Unit 5, Meols Cop Retail Park, Southport	Certificate of lawfulness for mezzanine floorspace	840	605	Out-of-Centre
N/2007/0956	Unit 5a, Meols Cop Retal Park, Southport	Certificate of lawfulness for mezzanine floorspace	684	684	Out-of-Centre
Sub Total			**5,462**	**4,839**	
South Sefton					
Bootle					
S/2010/1538	82 Linacre Road, Bootle	COU of former PH to mixed use ground floor (A1, A2 and A3)	387	N/A	Out-of-Centre
DC/2015/00036	107 Rimrose Road, Bootle	Change of use to A1, amalgamation with adjacent retail unit, installation of mezzanine.	1,849	N/A	Out-of-Centre
DC/2015/00194	140-147 New Strand, Mariners Way, Bootle	Reconfiguration of shopping centre	594	N/A	Town Centre
S/2012/0647	4 Switch Island Leisure Park, Dunningsbridge Road, Netherton, Bootle	Change of use to retail	3,313	N/A	Out-of-Centre
S/2009/1125	Maggies Public House, Bridle Road, Bootle	Outline application for Mixed Use development including one retail unit (A1)	372	268	Out-of-Centre

S/2007/0752 (extension of time S/2010/1227)	Former Johnsons Cleaners, Mildmay Road, Bootle	Conversion and extension of existing building to provide retail floorspace plus apartments	869	626	Out-of-Centre
S/2006/0578	Site 7 Penpoll Trading Estate, Hawthorne Road, Bootle	Demolition of existing building and redevelopment including shops	740	533	Out-of-Centre
S/2010/1157	Premises and land at Orrell Road, Bootle	Demolition of 4,006 sq.m bulky goods retail warehouse park and replacment with 929 sq.m bulky goods unit	- 3,077	- 2,461	Out-of-Centre
S/2010/1157	Premises and land at Orrell Road, Bootle	Erection of two open non-food retail units	1,392	1,113	Out-of-Centre
S/2010/0200	Courts, Unit 2, Racecourse Retail Park	Construction of extended mezzanine floor (uplift only)	205	148	Out-of-Centre
DC/2014/1102	65 Ormskirk Road, Aintree	Rear extension and installation of mezzanine.	1,946	1,946	Out-of-Centre
DC/2014/01910	Unit 5 Aintree Racecouse Retail Park, Ormskirk Road, Aintree	Installation of mezzanine, change of goods.	878	878	Out-of-Centre
S/2012/0904	6 Racecourse Retail Park, Aintree	Installation of mezzanines, two new units, extensions	N/A	2,566	Out-of-Centre
S/2010/0430	Unit 4, Topham Drive, Aintree	Construction of mezzanine floor	941	941	Out-of-Centre
S/2007/0938	Land forming part of car park adj Topham Drive, Aintree	Erection of single storey retail unit (A1, A2, A3 or A5).	314	267	Out-of-Centre
Crosby					
S/2010/1008	Sainsbury's Central Building, Church Road, Crosby	Use of land for siting of 7 temporary shop units (A1 to A5)	700	504	District Centre
S/2013/0305	Thornton Garage, 23 Edge Lane, Crosby	Change of use to A1	342	195	Out-of-Centre
S/2010/0456	113 Liverpool Road, Crosby	Change of use to retail showroom	984	519	Edge-of-Centre
S/2010/0956	72-74 Coronation Road, Crosby	COU for vacant car showroom (SG) to Retail (A1)	417	300	District Centre
S/2005/0821	Central Buildings, Church Road	Proposed four storey building comprising retail space, office and residential	1,100	792	District Centre
S/2010/1738	adj Aldi store, Moor Lane, Thonton	Erection of single storey building with car park	279	195	Out-of-Centre
Maghull					
S/2010/1503	Central Square, Westway	Partial redevelopment and refurb of Central Square, including five new units with mezzanine	1,461	N/A	District Centre
Netherton					
S/2010/0841	Bootle, Municipal Golf Course, Dunnings Bridge Road, Netherton	Erection of single storey golf clubhouse and retail shop	372	268	Out-of-Centre
Sub Total			**16,378**	**9,598**	
Total			**21,840**	**10,803**	
		Average	**780**	**577**	

Source: Sefton Council 2015

Appendix B – Table 4.14

Table 4-14 – Refused and withdrawn applications

Decision	Type	Ref No.	Address	Validation Date	Decision Date	Existing Use	Proposed Use	Proposal
WDN	FULM	S/2012/0559	Former Kingsway Club, Promenade Southport PR8 1RG	08 May 2012	11 February 2015	D2	A3	Erection of a mixed use development comprising an eight storey hotel with integral restaurant and attached five storey block comprising retail / restaurant / cafe use at ground floor with 52 self contained flats above
WDN	COU	S/2010/0455	74 Coronation Road Crosby	13 April 2010	04 June 2010	SUI	A1	Change of use from former Car Showroom (Sui Generis) to Retail (A1) involving the demolition of part of the garages, incorporating extensions to the roof, car parking and associated works
REF	FULM	S/2010/0350	Sainsbury'S 1-3 Liverpool Road Crosby L23 2SA	12 March 2010	06 October 2010	A1	A1	Redevelopment of land within Crosby district centre comprising the demolition of buildings and erection of retail food store with undercroft parking (Use Class A1) and: i) Full planning permission for erection of 7 small retail units comprising shops (A1); and/or financial and professional services (A2); and/or restaurants and cafes (A3); and/or drinking establishments (A4); and/or takeaway (A5) ii) Full planning permission for erection of community use building comprising financial and professional services (A2); and/or business (B1); and/or community uses (D1) with parking to rear. iii) Full planning permission for change of use and alteration of existing foodstore to shops (A1); and/or financial and professional services (A2); and/or restaurants and cafes (A3) and/or drinking establishments (A4); and/or takeaway (A5). iv) Full planning permission for construction of multi-storey car park to Islington with bus interchange facility and decked car park over existing Allengate car park. v) Full planning permission for new and altered vehicular and pedestrian accesses, including the re-routing of Moor Lane, landscaping of centre, construction of infrastructure and associated facilities together with associated temporary works and structures and associated utilities/services required by the development.
WDN	FUL	S/2012/0196	Units 6A - 9 Racecourse Retail Park Racecourse Retail Park Ormskirk Road Aintree	14 February 2012	03 January 2013	A1	A1	Reconfiguration of Units 6 and 6A including the installation of mezzanine floorspace, erection of two new units adjoining Unit 6A for Use Class A1 and/or A3 purposes, extension to the rear of Unit 8 and installation of a mezzanine floor within and alterations to the car park to improve circulation
WDN	FULM	S/2012/1413	Units 6A - 9 Racecourse R Racecourse Retail Park Ormskirk Road Aintree L9 5AN	07 December 2012	03 January 2013	A1	A1	Reconfiguration of Units 6 and 6a including the installation of mezzanine floorspace, erection of two new units adjoining Unit 6a for Use Class A1, A3 and / or A5 purposes, extension to the rear of Unit 8 and installation of a mezzanine floor within, alterations to the appearance of the building, alterations to the access including and amendment to the junction of the Retail Park and Ormskirk Road and internal car park alterations to improve circulation (alternative to S/2012/0904 granted 18 Oct 2012)
REF	FUL	S/2012/1242	117 Sefton Road Litherland L21 9HG	29 October 2012	07 March 2013	B2	A1	Demolition of existing buildings and erection of a Class A1 neighbourhood convenience store with associated parking, servicing, landscape and access arrangements
REF	FUL	DC/2014/001 88	Marine Football Club College Road Crosby L23 3AS	11 February 2014	08 April 2014			Erection of a convenience store with designated onsite parking, plus the erection of a souvenir shop/snack bar/turnstile building after demolition of the existing turnstile building and clubhouse extension