

F3I Council's response to Q81 retail provision – July 2020

Inspectors' Question 81

Retail provision within the Plan is based on the needs identified in the 2014 Retail and Commercial Leisure Study. This has assessed future floorspace requirements up to 2030. The study is now 6 years old and does not cover the full plan period. Can the Council confirm whether there has been an update? If not, how is reliance on the 2014 Study justified?

- 1.1 There has not been an update to the 2014 Retail and Commercial Leisure Study. Further work is subject to a review of this study, which can be provided at a later date.
- 1.2 It should be noted that during the Local Plan preparation process, there has been a change in the NPPF requirement to meet retail needs:
 - The 2014 Retail and Commercial Leisure Study was undertaken to inform the emerging local plan which was subject to consultation in 2016; at this point, the draft Plan covered the period between 2015 to 2030, therefore the study assessed floorspace requirements over this fifteen-year period at that time, the NPPF 2012 still applied, paragraph 23 of the NPPF then (2012) set out that needs for retail, leisure, office and other main town centre uses over the plan period are met in full.
 - In July 2018, the Government published the draft revised NPPF for consultation. In this version, paragraph 85 set out that in meeting anticipated needs for retail, leisure, office and other main town centre uses, planning policies should look at least ten years ahead.
 - On that basis, when the emerging local plan reached the Regulation 19 consultation in February 2019 with an updated plan period of 2016-2033, the floorspace requirements concluded from the existing evidence would still meet the (draft) revised NPPF requirement of looking at least ten years ahead. Therefore, the Council continued to rely on this evidence.
 - Paragraph 85 remains unchanged in the revised NPPF published in February 2019. The Local Plan retail provision, informed by the 2014 Retail and Commercial Leisure Study, is considered to deliver the NPPF requirement to meet retail needs.
- 1.3 The Council acknowledges that the supporting text in paragraph 7.47 under policy PC07 should be updated to highlight the changes made to the NPPF requirements with regards to meeting retail needs.