

# Aylesbury Retail Impact Threshold Note

## 1 INTRODUCTION

- 1.1 Following the EiP sessions, Aylesbury Vale District Council approached GL Hearn to advise on the potential to set a local threshold for Aylesbury for inclusion within the Vale of Aylesbury Local Plan.
- 1.2 The purpose of this note is to build on the advice prepared by GL Hearn on the overall potential for a threshold, which advised that 400sqm would be an appropriate threshold figure.
- 1.3 The advice identified that the figure was a 'blanket' for the district as a whole to ensure that out of centre schemes are assessed when they are to draw trade from centres, including smaller centres. Seven of the nine defined centres are considered small and 400sqm was identified as a scale which needed to be carefully considered for any potential for "significant adverse impact".
- 1.4 Although GL Hearn did not appear at the EiP, Lichfields questioned the floorspace threshold in respect of Aylesbury, claiming that 400sqm is unlikely to cause a significant adverse impact on Aylesbury given the scale and health of the centre.
- 1.5 Lichfields also identified that 400sqm was unduly onerous and is unfounded. In this respect the initial advice on the potential threshold identified the guidance in the NPPF and PPG (para 2.2-2.5) with Para 6.5 identifying that 75% of applications over the last 3 years have been less than 400sqm.
- 1.6 Despite the evidence presented, the Inspector has asked for further clarification on the potential for a different threshold for Aylesbury which is considered further below.

## 2 HEALTH OF AYLESBURY

- 2.1 It should be reiterated that GL Hearn has not been commissioned to undertake vitality and viability assessment of the centres within Aylesbury Vale. However the Retail Group have prepared a number of supporting studies for the Council including the Aylesbury Town Centre Growth Opportunity Assessment Study (November 2016)
- 2.2 The main overview of the health of Aylesbury is contained within the main Retail Thresholds Report.
- 2.3 This identified that overall Aylesbury adequately serves a mainstream/mass market both from a retail and a food and beverage perspective, which generates reasonable footfall. Although some aspects of the centre could be improved, such as the layout and overall environment and the quality of some operators (both retail and food and beverage), overall Aylesbury benefits from being the

highest order centre in Aylesbury Vale with a range of uses and attractors such as the market, cinema, theatre and museum.

### 3 EXISTING FLOORSPACE CHARACTERISTICS

3.1 In order to provide some wider context as to the health of Aylesbury, further retail floorspace information has been obtained from GOAD. This identified the following floorspace:

**Table 1: Centre Composition Analysis**

Units	Aylesbury	Gross floorspace (sqm)	Average Floorspace (sqm)
<b>A1 Comparison</b>	99	28,604	289
<b>A1 Convenience</b>	21	13,749	655
<b>Retail Services</b>	44	3,409	77
<b>Leisure Services</b>	76	16,127	212
<b>Financial and Business Services</b>	50	22,584	452
<b>Vacant</b>	51	6,243	122
<b>Total/Average</b>	341	90,716	266

Source: GOAD

- 3.2 The average size of the units within Aylesbury is 266sqm, and this reflects that Aylesbury is the largest centre in the district. As can be seen, the average unit sizes range from 77sqm for retail service units to 655sqm for convenience units.
- 3.3 The relevance of these existing average unit size comparisons when considering impact is the scale of proposals relative to existing centres and the individual type and size of units within them. When retail trade diversion is being assessed, the widely accepted approach is that 'like competes with like' and that the proximity of the proposal to a centre or centres will influence the level of diversion experienced. For example it would be reasonable to consider the impact of a proposal which would perform a potentially similar role, and thus potentially divert trade away from a centre giving rise to trading and consequential impacts.
- 3.4 Those consequential impacts could include reduced footfall within a centre and a lower propensity for linked trips/spending; impact upon continuing viability of retailing in centres; effect on vitality and viability; and the potential to attract investment into centres. It should also be recognised that impacts are cumulative and may gradually build up over a period of time.

## 4 RETAIL PROPOSALS

- 4.1 At a local level, Aylesbury Vale District Council has provided details of retail (A1) planning permissions over the last three years. In total there have been 66 planning applications to increase in retail floorspace (A1-A5), of which 32 have been in Aylesbury itself.
- 4.2 For Aylesbury, the information provided indicates that around 45% of proposals have been within the centre, whereas for the district as a whole, around 60% of the applications proposed development in out of centre locations.
- 4.3 The vast majority of applications in Aylesbury itself for A1-A5 floorspace have been small in scale, with around 40% of proposals less than 100sqm, 75% less than 400sqm with only 10% above 2,500sqm.
- 4.4 The overall average scale of the proposals which have come forwards in Aylesbury equates to an average size of 775sqm. However if the out of centre proposals are considered in isolation, when the need to support an application with further retail information may be required, the average size of those proposals totals 1,454 sqm.

## 5 CONCLUSIONS AND RECOMMENDATIONS

- 5.1 In order to consider the appropriateness of a local floorspace threshold, a number of inter related issues have been considered, as required by the NPPF and the PPG.
- 5.2 The health check identified that overall Aylesbury adequately serves a mainstream/mass market both from a retail and a food and beverage perspective, which generates reasonable footfall. Although some aspects of the centre could be improved, such as the layout and overall environment and the quality of some operators (both retail and food and beverage), overall Aylesbury benefits from being the highest order centre in Aylesbury Vale with a range of uses and attractors such as the market, cinema, theatre and museum.
- 5.3 The average size of the units within Aylesbury is 266sqm, and this reflects that Aylesbury is the largest centre in the district. The average unit sizes range from 77sqm for retail service units to 655sqm for convenience units.
- 5.4 The overall average scale of the proposals which have come forwards in Aylesbury equates to an average size of 775sqm. However if the out of centre proposals are considered in isolation, when the need to support an application with further retail information may be required, the average size of those proposals totals 1,454 sqm.

- 5.5 Notwithstanding the overall health of Aylesbury, it is still important for the Council to carefully consider retail proposals which come forward which are not within existing centres and which could have an impact upon them, both on an individual and a cumulative basis.
- 5.6 The recommendation to the Council is that a threshold be introduced which requires retail impact information to be provided on a proportionate basis, with an appropriate local floorspace threshold for Aylesbury being set at 1,500sqm (gross).
- 5.7 This would be larger than the average unit sizes within Aylesbury, but would reflect the health of the centre and its ability to withstand the impacts of a range of proposals on a range of units. The increased threshold for Aylesbury (when compared to the overall threshold for the district of 400sqm) would require impact to be demonstrated for convenience schemes which would equate to around 10% of the current convenience floorspace within the centre and comparison schemes proposing around 5% of the total comparison floorspace in the centre.
- 5.8 Furthermore nearly 45% of retail proposals in Aylesbury were in out of centre locations, where the cumulative impact of these proposals needs to be monitored to maintain the health of the main centre in Aylesbury.
- 5.9 This is a proportional floorspace threshold and would have resulted in 16% of proposals submitted in Aylesbury, or just over 1/3 of out of centre proposals (only 5 schemes), having to provide a level of supporting retail impact information.
- 5.10 It should also be remembered that the PPG advocates that the level of sequential and impact information provided in support of any application is proportionate and considered in a locally appropriate way. As such it is recommended that the Council work pro-actively with any applicant when scoping and agreeing the level of supporting retail information required.

**GL Hearn August 2018**