

Hearing Statement by Waveney District Council

Matter 10 – District-Wide Policies concerning Employment, Tourism and Retail, Leisure and Town Centres

Waveney Local Plan Examination

September 2018

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Question 10.1

Policy WLP8.12 – Existing Employment Areas

(a) Is the policy positively-prepared and effective?

1. Policy WLP8.12 is considered positively prepared. By protecting premises within existing employment areas from changes of use to other, potentially inappropriate uses, the policy helps ensure the objectively assessed need for new jobs, as set out in Policy WLP1.1, is met.
2. The policy alongside supporting guidance in Appendix 4 is considered effective in achieving its aims. It is based on evidence contained within the Existing Employment Areas Review (C6), which recommends the most appropriate employment areas to protect in ensuring a suitable range of employment premises are retained in the market.
3. The policy is considered to be fully consistent with paragraph 22 of the 2012 National Planning Policy Framework in that the marketing test allows the re-use of land and premises if there is no prospect of land or premises being used for employment uses (providing the new use is compatible with surrounding employment uses). The policy is also considered consistent with paragraphs 120 and 121 of the 2018 National Planning Policy Framework for the same reasons as above. The protection of existing employment areas particularly relates well with the new requirement in the 2018 Framework about ensuring re-use does not undermine key economic sectors or sites.
4. Amber Real Estate Investments Limited (Rep ID: 623) requested a change to the name of the policy and other amendments to the policy. The Council does not support these changes which add superfluous text to the policy and potentially weaken the protection of employment premises by removing the terms ‘exceptionally’ and ‘will only be permitted’. The Council considers that the policy is sufficiently positively worded for the intended effect of the policy and is sound without the suggested changes.

(b) Are the existing employment areas as defined on the Policies Map soundly-based?

5. The Existing Employment Areas as shown on the Policies Map are based on evidence contained within the Existing Employment Areas Review (C6). However, on reviewing this evidence, it has become apparent that the published version of this piece of evidence has some pages missing in Appendix 1. This Appendix should contain assessments of all existing employment areas listed in the table on page 7 of the document. This has now been corrected and the document republished as Document C6a in the Examination Library. Additionally, it has come to the Council’s attention that the assessment for SSP5 on pages 140-145 of the original document (pages 207-212 of the amended version (C6a)) concludes

that B class employment premises in the area should be protected. However, this area is missing from the Policies Map (A5). A Main Modification is therefore proposed to add in this area on the Policies Map as an Existing Employment Area. See MM10.1 of the Suggested Main and Additional Modifications at the end of this document.

6. Amber Real Estate Investments Limited (Rep ID: 624) also requested an extension to the Existing Employment Area at Bernard Matthews in Holton to cover their operational area. On reviewing this, the Council agrees that it would be appropriate and consistent with the aims of the policy to include the entire operational area. Therefore a Main Modification is proposed to amend the boundary to reflect the operational area of the business. See MM10.2 of the Suggested Main and Additional Modifications at the end of this document.
7. Halesworth Town Council (Rep ID: 958) have requested an additional Existing Employment Area to be designated in the vicinity of the railway station. There are a small number of business premises in this location set amongst a number of other mixed-uses. The area is not considered sufficiently strategic to be considered as an Existing Employment Area in the Local Plan, particularly when compared with other areas identified as Existing Employment Areas in the town. However, the Council considers that protection for these uses could be considered through the preparation of the Halesworth Neighbourhood Plan.

Question 10.2

Policy WLP8.13 – New Employment Development

(a) Does the policy provide sufficient flexibility for employment uses to expand outside the defined existing employment areas?

8. Amber Real Estate Investments Limited (Rep ID:625) have raised concern that the policy could be too restrictive for existing businesses in existing employment areas wishing to expand outside the defined areas, and as such the policy is less flexible than the existing approach set out in Policy DM08 of the existing Development Management Policies Development Plan Document (E2) (which will be superseded by this Local Plan).
9. The requirement for demonstrating there is no alternative land available within existing employment areas, settlement boundaries and other existing employment areas is considered reasonable in meeting the aims of the policy and the strategic priorities of the plan. However, it is not the intention of the policy to be overly restrictive to existing businesses within existing employment areas wishing to expand and the Council does not consider the policy is as restrictive as suggested by the representation when read with the supporting text.

10. Clearly with respect to existing businesses it is highly likely that in most cases the only suitable land is going to be adjacent to the existing business or in the vicinity of it. The supporting text already refers to the specific locational requirements of business in judging the suitability of alternative land. Therefore it is not considered that the policy places an unjustified evidential burden on operators.
11. Amber Real Estate Investments Limited (Rep ID: 625) also requested clarity around the term 'impact on surrounding land uses'. The intention of the policy was to limit adverse impacts although it is accepted that this could be clearer. It is considered a Main Modification to change 'impact on surrounding land uses' to 'significant adverse impact on surrounding land uses' would help clarify the issue and also bring the policy in line with text in paragraph 182 of the 2018 National Planning Policy Framework. See MM10.3 of the Suggested Main and Additional Modifications at the end of this document.

Question 10.3

Policy WLP8.14 – Conversion and Replacement of Rural Buildings for Employment Use

- (a) Is reference in the policy/its supporting text to flood risk requirements necessary for the plan to be sound or is this adequately covered by policy WLP8.24?
12. It is considered that it is unnecessary for the policy or supporting text to reference the requirement for a flood risk assessment. The Plan needs to be read as a whole and Policy WLP8.24 is clear on the approach to dealing with development proposals at risk of flooding. Additionally, footnote 50 of the 2018 National Planning Policy Framework is clear on the situations when a flood risk assessment will be required.

Question 10.4

Policy WLP8.15 – New Self Catering Tourist Accommodation

- (a) Is it necessary for the plan to be sound for the policy to be extended to cover the enhancement/expansion of existing self-catering tourist accommodation?
13. The policy is considered to be sound and therefore it is not necessary for the policy to be amended to address enhancement/expansion of existing self-catering tourist accommodation

in the interests of soundness. Nonetheless, it is acknowledged that the addition of guiding text as to how the policy should be applied in the case of enhancement/expansions of existing self-catering tourist accommodation would assist in the policy's implementation (Bourne Leisure Rep ID:599). As such the following Main Modification is proposed. See MM10.4 of the Suggested Main and Additional Modifications at the end of this document.

After paragraph 8.81 insert new paragraph:

The criteria set out in policy WLP8.15 apply to proposals to extend or enhance existing self catering tourist accommodation sites as well as proposals for new development. Where an expansion or enhancement is involved, the resultant number of pitches or units making up the proposed development as a whole will determine which criteria should be applied.

14. Savills UK on behalf of Bourne Leisure have recommended a change to policy WLP8.15 in their representation (Rep ID: 599) asking for the addition of text stating: "Proposals to enhance and expand existing self-catering tourist accommodation in the District will be supported where they also comply with the other policies of this Plan." This approach is not supported as it would allow enhancements/expansions of existing sites irrespective of their location. Policy WLP8.15 applies criteria in response to the scale of development and its location in the interests of promoting sustainable modes of transport. This proposed change does not address issues of scale or location and therefore does not promote sustainable modes of transport and as such would not deliver sustainable development.

(b) Is reference in the policy/its supporting text to flood risk requirements necessary for the plan to be sound or is this adequately covered by policy WLP8.24?

15. It is considered that it is unnecessary for the policy or supporting text to reference the requirement for a flood risk assessment. The Plan needs to be read as a whole and Policy WLP8.24 is clear on the approach to dealing with development proposals at risk of flooding. Additionally, footnote 50 of the 2018 National Planning Policy Framework is clear on the situations when a flood risk assessment will be required.

Question 10.5

Policy WLP8.16 – New Hotels and Guest Houses

(a) Is the policy positively-prepared, justified and consistent with national policy in restricting new build hotels/guest houses to town centre/seafront locations in Corton, Lowestoft, Kessingland and Southwold only?

16. Policy WLP8.16 is considered positively prepared. The Plan makes clear the key significance of the tourism industry to the District. The Vision in Section 1 of the Plan includes a stronger and more diverse economy in which the tourism economy plays a key role. Projections in the Employment Land Needs Assessment Update (2017) (C5) (pages 6 – 20) show a significant growth in jobs in the tourism sector. The Waveney Annual Monitoring Report (D2) (page 20) shows a steady number of planning approvals for tourism development in Waveney. The supporting text to the policy highlights the important role that hotels and guest houses play in this sector. The policy itself sets out a positive strategy by clearly identifying areas where new build development will be supported. These areas are town centre and seafront locations where services and facilities are already available and where new hotels and guest houses would be complimentary to existing town centre uses.
17. Policy WLP8.16 is considered to be justified. Documents in the local plan evidence base including Employment Land Needs Assessment Update (C5) and the Annual Monitoring Report (D2) (as referenced above) highlight the significance of tourism for the District and therefore it is vital to have supportive planning policies, including for new build hotels and guest houses. Suitable alternative options for the policy have been explored through Sustainability Appraisal (A2) (pages 639 – 642) which has been subject to consultation. This concludes that policy WLP8.16 would allow development in sustainable locations; would support the tourism economy; and increase footfall in town centres (page 128). No negative effects were identified (pages 405 – 406). Reasons the alternative options were discounted are included on page 129. The policy was included as part of the first draft local plan. A summary of comments received and the Council's response can be found on pages 1162 – 1163 of the Consultation Statement (A4).
18. Lowestoft (including Corton) is identified as the main centre for growth in the District in policy WLP1.1. The same policy identifies Southwold as a market town and Kessingland as a larger village which are locations identified for growth. The seafronts at Corton, Lowestoft, Kessingland and Southwold are all associated with a range of services and facilities which would be complementary to guest house and hotel businesses. These locations are therefore consistent with the scale and location of growth set out in the Plan and promote sustainable development.
19. The 2012 and 2018 versions of the National Planning Policy Framework both specify that hotels are main town centre uses and both seek to ensure the vitality of town centres. The policy is consistent

with national policy in this respect by directing new build hotel and guest house uses to town centre locations. The specified seafront locations are all well connected to services and facilities which would support sustainable development and the vitality of town centres.

20. Savills UK on behalf of Benacre Company (Rep ID: 399) objected to the policy and proposed that new build hotels and guesthouses should be supported anywhere that they make a positive contribution and support the local economy. This approach is not supported as it could allow new build guest houses and hotels to be developed in any location including remote and isolated sites. Development in such locations would go against sustainable patterns of development and could undermine existing town centres. These effects would be intensified if the developments were large in scale. This would be inconsistent with the Plan's strategy for the location of growth as set out in policy WLP1.1 Furthermore, Benacre Company's proposal would conflict with national policy which identifies that hotels are main town centre uses and directs such development to town centres.

Question 10.6

Policy WLP8.17 – Existing Tourist Accommodation

(a) Is the policy positively-prepared and consistent with national policy?

21. Policy WLP8.17 is considered positively prepared. The Plan makes clear the key significance of the tourism industry to the District. The Vision in Section 1 of the plan includes a stronger and more diverse economy in which the tourism economy plays a key role. The Employment Land Needs Assessment Update (2017) (C5) (pages 6 – 20) predicts a significant growth in jobs in the tourism sector and the Waveney Annual Monitoring Report (D2) (page 20) shows a steady number of planning approvals for tourism development in Waveney. The supporting text to the policy highlights the important role that existing tourist accommodation plays in this sector. The policy seeks to protect existing tourist accommodation so that it can continue to support and contribute to the tourism economy. Further, the policy includes an element of flexibility so that tourist accommodation can be re-used where it can be fully demonstrated there is no demand for it.
22. Policy WLP8.17 is considered to be consistent with national policy. It is part of the economic vision in the Plan; supports existing tourism businesses; and includes flexibility to respond to changing circumstances as required in para. 21 of the 2012 NPPF and para. 81 of the 2018 NPPF. Thereby the policy supports sustainable development as set out in national policy.

Question 10.7

Policy WLP8.18 – New Town Centre Use Development

(a) Is the policy's 350 sq m threshold for Impact Assessments consistent with national policy and justified by robust evidence?

23. Policy WLP8.18 contains a threshold for impact assessments that is both consistent with national policy and justified by robust evidence. Paragraph 26 of the 2012 National Planning Policy Framework requires an impact test on all retail and leisure proposals in out of town locations, which are not in accordance with the Local Plan. The floor space threshold at which an impact test is required can be set at a level defined by a local authority. Otherwise the default national threshold of 2,500 square metres should be used. This is mirrored in paragraph 89 of the 2018 Framework. A locally set retail impact test threshold is necessary to assess whether out of town retail proposals undermine the role of town centres within the District and whether they will have an impact on existing, committed and planned public and private investment or on the role of town centres. In response to these issues the Council appointed Carter Jonas, the leading experts on retail and town centre issues, to prepare the Retail Impact Threshold Advice (C8).
24. A consultation response from Brookhouse Group (Rep ID: 607) has stated that the evidence produced to justify the lower retail impact test threshold has not been prepared against the six key tests outlined in the planning practice guidance (Paragraph reference ID: 2b-016-20140306). Tesco (Rep ID: 516) supports the 350 square metre retail impact test threshold but also questions whether it has been prepared against the six key tests.
25. In response to this, the information below demonstrates that the Retail Impact Threshold Advice (C8) has been prepared against the six tests set out in paragraph 2b-016-20140306 of the National Planning Practice Guidance. The six key tests are:
- 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

Scale of proposals relative to town centres

26. Chapter 5 of the Retail Impact Threshold Advice (C8, page 15) provides an analysis of average floor space in each of the town centres across the District. Paragraph 5.8 (C8, page 16) concludes that the average retail unit size in each town centre is significantly below the default threshold of 2,500 square metres. The town with the largest average retail unit size is Lowestoft, at 260 square metres; the

smallest is Southwold at 97 square metres. Chapter 6 (C8, page 17) provides an analysis of the size and impact of out of town retail proposals. The chapter notes that out of town retail proposals are significantly varied in size, from 93 square metres to 3,856 square metres (C8, page 18). This largest unit has since been subdivided into a number of smaller units with only one of these being above the nationally set threshold. As the Retail Impact Threshold Advice (C8, page 18) makes clear this reinforces the need for a locally set retail impact test threshold that is lower than the nationally set threshold. As the Retail Impact Threshold Advice (C8, page 21) makes clear one single threshold is appropriate across the whole District for reasons of simplicity and transparency, as well as being supported by the evidence.

The existing viability and vitality of town centres

27. The Retail Impact Threshold Advice provides a health check update of each of the town centres within the District (C8, page 10). In effect this work updates the earlier health checks undertaken as part of the Retail and Leisure Needs Assessment completed in 2016 (C7, pages 28-75). The health checks provide a survey of the strengths and weaknesses of each town centre within the District. Overall it is considered that the town centres perform consistently well but that Lowestoft town centre faces significant challenges from out of town competition and internet retailing. Lowestoft also suffers higher vacancy rates that are above the national average and are higher than elsewhere in the District (C8, page 10). The health checks in other town centres reveal a variety of strengths and weaknesses, although overall they tend to be performing well, with the possible exception of Bungay (C8, pages 11-14). A consistent theme is the small size of the retail units in town centres. This means that even moderately sized new retail outlets could potentially look to locate in out of centre areas and this could have a negative impact upon town centre shops and businesses.

Cumulative effects of recent developments

28. Chapter 6 of the Retail Impact Threshold Advice (C8, page 17) provides a review of retail planning permissions of over 500 square metres granted since 2012. This focuses in particular on the two largest areas of retail development during that time: North Quay Retail Park and Land at Tower Road. In the case of North Quay Retail Park the review shows that all of the planning applications during that time have been below 2,500 square metres and the trend has been towards creating smaller retail units. The review also notes the opening of services such as a new Costa Coffee outlet, which will prolong the amount of time people spend at the retail park. In the case of the Tower Road development again all of the retail units were significantly below the 2,500 square metre threshold. The Retail Impact Threshold advice (C8, page 20) notes that with conditions this development was not thought to cause significant harm upon Lowestoft town centre but cautions that some trade diversion from the town centre is expected. It is also notable that this scheme includes A3 uses, which will add to its attractiveness for consumers. The Retail Impact Threshold Advice (C8, page 20) advises that the trend towards out of town retail development will continue. It is clear from this work that there is the potential for out of town retail development, particularly that accompanied by other leisure and catering uses, to have a cumulative impact upon local town centres, particularly Lowestoft.

Whether local town centres are vulnerable

29. Chapter 4 (C8, page 10) of The Retail Impact Threshold Advice notes the strengths and weaknesses of each of the town centres. Paragraph 4.26 (C8, page 14) in particular notes the vulnerability of Lowestoft to out of town development. It is noted in the study that Lowestoft town centre is faced with an increasingly challenging environment due to out of town retail development at the North Quay Retail Park and the retail development at Tower Road to the south of Lowestoft. As stated above both of these include smaller retail units in out of town locations. Further advice from Carter Jonas states that this is set against a wider retail background in the District and elsewhere in which national retailers are moving away from a strategy of opening large out of town outlets towards smaller out of town shops, such as those found at garages. These tend to be between 280 square metres and 372 square metres in size for convenience outlets. In this context it is quite probable that a retail proposal for 350 square metres is unlikely to serve the immediate neighbourhood and is likely to have a wider trade draw, which may impact upon a town centre. Similarly comparison retailers favour medium sized units of between 465 and 929 square metres, which cannot normally be located within town centres. It is therefore reasonable to conclude that town centres are vulnerable to out of town development of smaller retail units. This needs to be reflected in the adoption of a lower retail impact test threshold.

Likely effects of development on any town centre strategy

30. The Local Plan town centre strategy, as set out in policy WLP8.18, seeks to focus retail developments within town centres. Policy WLP8.19 identifies town centres, and in particular primary and secondary frontages, as the favoured locations for retail uses. Chapter 6 of the Retail Impact Threshold Advice (C8, page 17) notes that the nearly all recent planning permissions for out of town retail development include unit sizes of significantly below the national retail impact threshold of 2,500 square metres. By contrast there are no town centre retail planning permissions during this time period. This trend towards smaller, out of town units has the potential to significantly undermine town centre retail strategies contained within the Local Plan. Without a locally set threshold the Council will lose the ability to test the impact of smaller out of town retail proposals, which could undermine both the effectiveness of town centre strategies in the Local Plan and the viability of town centres themselves.

Impact on any other planned investment

31. Local Plan policy WLP8.18 clearly focuses retail development in town centre locations. It therefore follows that town centres are the favoured locations for investment in new retail schemes, as well as for other town centre uses. However as advice from the Retail Impact Threshold Advice shows retailers are favouring out of centre locations. There is also a trend towards smaller retail units that fall below the nationally set threshold for requiring an impact test. This means that retailers do not need to demonstrate that their scheme will not have a significant impact upon town centres. Without a locally set impact threshold the Council will not be able to ascertain the effect of these applications. The result of this is that retailers are more likely to invest in out of town rather than town centre locations. As a result town centres in the District will become less attractive places in which to invest

and this will undermine the effectiveness of and confidence in existing investment plans.

(b) Are the town centre boundaries and primary shopping areas as defined on the Policies Map soundly-based?

32. Town centre boundaries and primary shopping areas as defined on the Policies Map are soundly based. Town centres and primary shopping areas are based on the work undertaken in chapter 14 of the Retail and Leisure Needs Assessment (2016) (C7, page 112). This included town centre survey work, which identified where shops and other town centre uses (as defined in Annex 2 of the National Planning Practice Guidance) were located within Lowestoft and the market towns. This information was then used to define both town centres and primary shopping areas. The designation of town centres and primary shopping areas also took account of changing circumstances and any changes in the location of town centre uses since the preparation of the current Local Plan.
33. The approach taken by the Local Plan in identifying town centres and primary shopping areas is consistent with the approach advocated in paragraph 23 of the 2012 National Planning Policy Framework and paragraph 85 of the 2018 Framework. The Local Plan defines a hierarchy of town centres within the District, with Lowestoft being the largest followed by Beccles, Bungay, Halesworth and Southwold. These are identified as the preferred location for new retail and town centre use development. Within town centres the Local Plan identifies primary shopping areas, which have the greatest concentration of retailers, and secondary shopping frontages, which have a greater mix of uses. District and local shopping centres sit beneath town centres within the District's retail hierarchy.
34. Tesco (Rep ID: 516) is supportive of the Local Plan's approach to retail within the District, including changes to the Policies Map in Beccles, but has stated that Beccles town centre boundary should be re drawn to include the Tesco car park. However this is not considered appropriate because it would mean that further retail development proposals on the site of the car park could be permitted without being subject to a sequential test or impact test. This would mean that it would not be possible to test the impact of a retail proposal upon the town centre. As a result retail schemes that were previously out of town would have the potential to undermine the town centre as defined on the Policies Map. This could impact upon the viability of shops and businesses already located within the town centre. Consequently the Tesco car park should not be included within Beccles town centre. There is also the potential to shift the focus of the town centre further towards the Tesco supermarket, which could negatively impact upon other parts of the town centre. This approach is consistent with that recommended in the Retail and Leisure Needs Assessment (C7, page 116 and Appendix 11). Therefore no changes are considered necessary in light of this representation.
35. This is a positive approach to planning for town centres, which protects and defines town centres as the best locations for retail development and seeks to focus future economic development within town centres. This approach is deliverable and will protect town centres.

(c) In order for it to be sound should the policy (or the plan more widely) include requirements in respect of change of use of offices to residential in town centres?

36. The policy approach to the change of use of offices in town centres and across the District is considered sound.
37. Lowestoft Town Council (Rep ID: 954) states that the Local Plan should include measures to control the change of use from offices to residential within town centres. Policy WLP8.18 supports office development (A2 and B1a) in the town centre but planning policy cannot control changes of use if they are permitted through the General Permitted Development Order. However there are certain instances where planning policies can control the change of use of office premises and a policy framework is in place to facilitate this. Local Plan policy WLP8.19 seeks, in secondary shopping areas, to prevent the conversion of A2 office uses, such as solicitor's offices and estate agents, to uses that do not support the vitality and viability of the town centre and could result in a concentration of non town centre uses. This approach is consistent with paragraph 23 of the 2012 National Planning Policy Framework and paragraph 85d of the 2018 Framework, both of which state that local authorities should maintain a range of sites for town centre uses, including offices. In addition, Policies WLP2.11, WLP2.12 and WLP8.20 have a positive approach to the retention of A2 offices in Oulton Broad and Kirkley District Shopping Areas and Local Shopping Centres respectively.
38. There is little scope for new B1 office development in town centres. Therefore, subject to permitted development rights, policy WLP8.12 Existing Employment Areas seeks to resist the loss of employment uses such as B1 office uses in existing employment areas to non employment uses unless marketing evidence and compatibility with surrounding uses dictate otherwise. In addition, policies in the Local Plan such as WLP8.13 New Employment Development take a flexible approach to the provision of employment uses including offices, taking into account surrounding land uses and where necessary need and land availability.

Question 10.8

Policy WLP8.19 – Vitality and Viability of Town Centres

(a) Is the policy positively-prepared and consistent with national policy?

39. Paragraph 23 of the 2012 National Planning Policy Framework requires local plans to define a hierarchy of centres as well as to define town centre boundaries and primary shopping areas. Paragraph 85 of the 2018 Framework is almost the same but refers instead to the need to define a hierarchy of town centres. The 2012 Framework also requires Local Plans to define primary and secondary shopping frontages. Policy WLP8.19 is consistent with the NPPF in that it defines primary

and secondary shopping frontages and identifies them as the preferred locations for future retail development.

40. The policy is informed by chapter 14 of the Retail and Leisure Needs Assessment (2016) (C7, page 112), which defines town centres, primary shopping areas and primary and secondary shopping frontages. Definition of primary shopping frontages is based on where the proportion of units occupied by retail units is at its highest; secondary shopping frontages are those that have a greater range of town centre uses. Primary and secondary shopping frontages are also those that experience the highest levels of footfall from members of the public. Primary and secondary shopping frontages therefore seek to promote development which strengthens the retail areas within town centres.
41. The policy is informed by chapter 11 of the Retail and Leisure Needs Assessment (C7, page 80), which identifies the need for new retail development across the District. The policy meets the need for new retail floor space across the District while also protecting primary and secondary shopping frontages and town centres more widely as the favoured locations for retail activity. Policy WLP8.19 is therefore both positively prepared and consistent with national policy.

Question 10.9

Policy WLP8.20 – Local Shopping Centres

(a) Is the policy positively-prepared and consistent with national policy?

42. Policy WLP8.20 is also in conformity with paragraph 23 of the National Planning Policy Framework, which requires local plans to define a network and hierarchy of centres; paragraph 85 of the 2018 Framework requires local plans to define a hierarchy of town centres. The policy defines a hierarchy of centres, which includes local centres, and seeks to protect and enhance the role of local centres. This includes encouraging the development of limited new retail, community service, leisure and office uses within local shopping centres. The conversion of units from retail (A1), financial and professional (A2), restaurants and cafes (A3), drinking establishments (A4), and hot food takeaways (A5) will be resisted. The change of retail uses to A2, A3, A4 or A5 uses will also only be permitted if it does not undermine the function and viability of a local shopping centre.
43. The policy is informed by the Retail and Leisure Needs Assessment, which has identified a hierarchy of centres throughout the District. Local Centres are identified as small mixed use centres that serve only the immediate surrounding area (C7, page 77). Each local shopping centre is assessed in terms of its ability to serve the surrounding area and its level of health. This includes the number of vacant units, the level of footfall and the quality of the environment. Information taken from these assessments is then used to inform the preparation of the policy. Policy WLP8.20 is therefore positively prepared and consistent with national policy.

Suggested Main and Additional Modifications

Modification No.	Paragraph / Policy	Change	Reason	Related Representation
Main Modifications				
MM10.1	Central Lowestoft Inset Map	Add Kirkley Rise as an Existing Employment Area.	Site is recommended as an Existing Employment Area in evidence base however erroneously omitted from Policies Map at publication stage.	Officer change
MM10.2	Halesworth and Holton Inset Map	Amend boundary of Bernard Matthews, Holton Existing Employment Area to reflect operational area.	To ensure the Existing Employment Area covers the entire operational area of the site.	Rep ID: 624 Amber Real Estate Investments Limited
MM10.3	Policy WLP8.13 New Employment Development	Insert 'significant adverse' before 'impact' in the second and third paragraph of the policy.	To clarify the operation of the policy and to ensure consistency of terms with the National Planning Policy Framework.	Rep ID: 625 Amber Real Estate Investments Limited
MM10.4	Policy WLP8.15 New Self Catering Tourist Accommodation	After paragraph 8.81 insert: "The criteria set out in policy WLP8.15 apply to proposals to extend or enhance existing self catering tourist accommodation sites as well as proposals for new development. Where an expansion or enhancement is involved, the resultant number of pitches or units making up the proposed development as a whole will determine which criteria should be applied."	To clarify how the policy will apply to extensions/expansions of existing tourist accommodation.	Rep ID: 599 Bourne Leisure Ltd
MM10.5	Policy WLP8.16 New Hotels and Guest Houses	Insert 'also' in first sentence of policy before 'seafront'.	To clarify that new development is supported in both town centres and the specified seafront locations.	Officer change

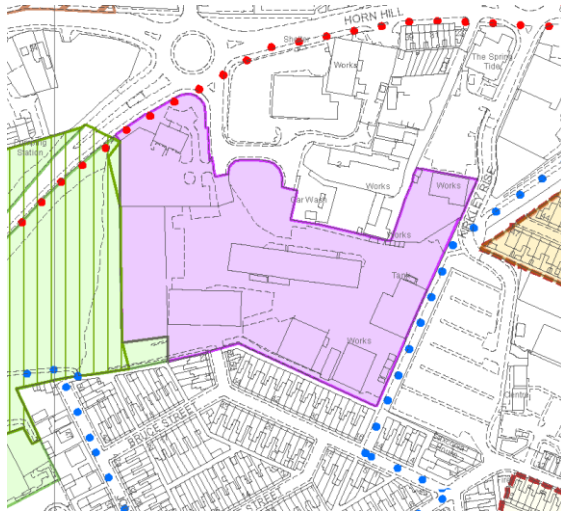
Please note this list does not include modifications contained in Statements of Common Ground.

MM10.1 Add Kirkley Rise as an Existing Employment Area.

Submitted Local Plan

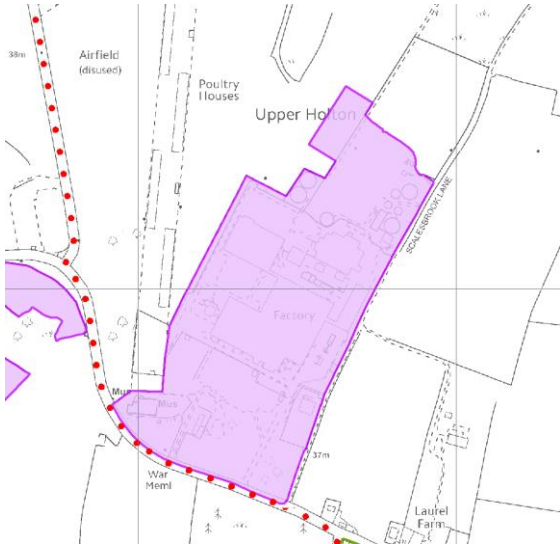


Proposed modification



MM10.2 Amend boundary of Bernard Matthews, Holton Existing Employment Area to reflect operational area

Submitted Local Plan



Proposed modification

