



Working towards a Core Strategy for Wiltshire

# Topic paper 6: Retail

Addendum

Wiltshire Core Strategy  
Consultation January 2012

# **TOPIC PAPER 6 – RETAIL ADDENDA**

## Topic Paper 6: Retail

This paper is one of 16 topic papers, listed below, which form part of the evidence base in support of the emerging Wiltshire Core Strategy. These topic papers have been produced in order to present a coordinated view of some of the main evidence that has been considered in drafting the emerging Core Strategy. It is hoped that this will make it easier to understand how we have reached our conclusions. The papers are all available from the council website:

Topic Paper 1: Climate Change

Topic Paper 2: Housing

Topic Paper 3: Settlement Strategy

Topic Paper 4: Rural Signposting Tool

Topic Paper 5: Natural Environment

Topic Paper 6: Retail

Topic Paper 7: Economy

Topic Paper 8: Infrastructure and Planning Obligations

Topic Paper 9: Built and Historic Environment

Topic Paper 10: Transport

Topic Paper 11: Green Infrastructure

Topic Paper 12: Site Selection Process

Topic Paper 13: Military Issues

Topic Paper 14: Building Resilient Communities

Topic Paper 15: Housing Requirement Technical Paper

Topic Paper 16: Gypsy and Travellers

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# 1.0 Executive Summary

This report represents a supplementary paper to Topic Paper 6 on Retail. This has been produced to respond to the 'Wiltshire Core Strategy Consultation Document' WCSCD. The document was consulted on during June 2011 and August 2011. This builds on the original Wiltshire 2026 Consultation that took place during 2009.

The paper firstly summarises the representations received from the latest consultation with respect to retailing. The paper will then look at relevant individual comments that were made to ascertain if there are any additional areas that needed looking into to ensure the submission draft is sound. This addendum Topic Paper will also be updated with any new evidence that has either been produced by the council or by external bodies or new government guidance that has been published. The analysis of all of this information has resulted in the formulation of draft policies for the Core Strategy submission draft, that were then appraised through Sustainability Appraisal and Habitats Regulations Assessment to identify any amendments required to ensure that the plan and policies are in conformity with the relevant European directives.

## 2.0 Introduction, Purpose of Document and Context

This document is the second element of the series of topic papers that were published in order to present an audit trail setting out firstly the evidence upon which the WCSCD has been based; and secondly, to show the results of the consultation and demonstrate which policies to take forward in the submission document.

This Topic Paper approach has been decided upon in order to make it easier for stakeholders to understand how conclusions have been reached by the council. It has been a key part of identifying the challenges facing Wiltshire and feasible options for addressing them.

The Topic Paper Addenda identifies the response received for the WCSCD consultation and identifies how the result have influenced and evolved to create the submission draft.

### 2.1 Assessing the Local Need - Why Are We Developing Policies on Retail?

The need for this topic to be included within the emerging Local Development Framework has emerged clearly from an analysis of national planning policy and an appraisal of the growing body of specialist literature and guidance given to local planning authorities. Furthermore original work that has formed part of the base of evidence which will inform the Local Development Framework process has highlighted that there is a need for a new and effective set of policies to help meet our objectives.

### 2.2 What are we trying to achieve - what are our overall objectives?

The core objectives as envisioned at the outset of the Core Strategy were to develop a set of planning policies, which contribute to the following patterns of land use:

- Providing for the most sustainable pattern of development that minimises the need to travel and maximises the potential to use sustainable transport.
- Creating the right environment to deliver economic growth, delivering the jobs Wiltshire's population needs locally, and taking a flexible and responsive approach to employment land delivery.
- Phasing development to ensure that jobs and the right infrastructure are delivered at the right time to ensure that out-commuting, in particular to areas outside of Wiltshire, is not increased and development does not have a detrimental impact on infrastructure.
- Working towards lowering Wiltshire's carbon footprint through providing renewable energy, sustainable construction and location of development.
- Protecting and planning for the enhancement of the environment, wherever possible, including development of green infrastructure to support the health and wellbeing of communities.
- Providing high quality, well designed development, and ensuring full local community involvement in planning for significant new proposals.

- Providing the framework to deliver Neighbourhood Plans.

## 3.0 Findings of the Wiltshire Core Strategy Consultation Document (WCSCD)

### 3.1 What was asked?

The future strength of retailing in Wiltshire is important for its continued prosperous economy. Retailing is therefore covered within the WCSCD consultation. The document asked some specific questions about retail, and also had a general question (Question 22) where respondents could comment on anything in the document not covered by a question.

### 3.2 Area Wide – Strategic Objectives and overarching policies

One of the strategic objectives of the Core Strategy is to enhance the vitality and viability of the town centres in Wiltshire. There is a challenge to ensure that the towns of Wiltshire (and particularly Salisbury together with Chippenham and Trowbridge) strengthen their roles as shopping destinations to reduce the ‘leakage’ of trade to other competing centres such as Bath, Swindon, Southampton and Basingstoke.

### 3.3 SO7 – to enhance the vitality and viability of town centres

This objective was scrutinised as part of the previous Wiltshire 2026 consultation, and the following is a summary of response. In the 2026 document, it was then numbered SO5.

*‘SO5 To enhance the vitality and viability of town centres*

*The strategy should recognise and recommend that more retail is needed to support the levels of development proposed. The retail hierarchy needs to be set out in the core strategy.’*

There were no further comments directly related to this objective in the WCSCD, as most comments referred specifically to the questions / specific policies.

National planning policy, as set out in Planning Policy Statement 4 – Planning for sustainable economic growth (PPS4), requires local planning authorities to define the extent of a town centre as well as designating primary and secondary retail frontages on the proposals maps and setting policies which make clear which uses will be permitted in such locations. The larger centres of Salisbury, Trowbridge, Chippenham, Amesbury, Bradford on Avon, Calne, Corsham, Cricklade, Devizes, Malmesbury, Marlborough, Melksham, Warminster, Westbury and Wootton Bassett, already have designated frontages and corresponding policies in the relevant District/Local Plans.

Any necessary amendments to these frontages and corresponding policies could be identified through the emerging Neighbourhood Planning process or other planning mechanism.

The settlements of Downton, Ludgershall, Mere, Pewsey, Tidworth, Tisbury and Wilton currently do not have defined town centres or designated frontages and associated policies. Frontages and corresponding policies will be developed through the emerging Neighbourhood Planning process.

PPS4 also requires Local Planning Authorities to consider setting floorspace thresholds for the scale of edge-of-centre and out-of-centre retail development which should be subject to an impact assessment.

Wiltshire contains a number of smaller centres and villages that are all vulnerable to possible edge or out of centre retail and leisure development. There is also a concern that a succession of planning applications each individually lower than the gross threshold set nationally (2,500 sq m) could have a cumulative adverse impact on our town centres. Core Policy 41 below therefore requires that all proposals for edge-of-centre or out-of-centre retail or leisure development are accompanied by an impact assessment, regardless of size.

Any proposal involving the creation of more than 200 square metres gross additional retail or leisure floorspace should also comply with the sequential approach, as set out in PPS4, to ensure any proposal is on the most central site available.

Specific challenges and priorities relating to retail provision in the principal settlements and market towns are identified where appropriate in the Community Area Strategies.

In addition to retail development, it is also important that key services and facilities are retained in the central areas of the market towns, in order to maintain the vitality and viability of the town centres. The Core Strategy envisages that each market town develops more detailed local policy through the Neighbourhood Planning process or other planning mechanism.

### **3.4 Core Policy 41 - Retail and leisure**

#### **Core Policy 41 - Retail and leisure**

All proposals for retail or leisure uses on sites which are not within a Primary or Secondary Retail Frontage, and are not within a village centre, must be accompanied by an impact assessment.

## **Summary of responses**

There were numerous responses to this policy, and they are as follows:

1. Core Policy 41 supported
2. Words, words, words. Very little in this core strategy actually seems aimed at doing any of this
3. If this policy is to have relevance, it should contain a strategy and guidance for all Wiltshire towns to maintain or improve their vitality and viability. Town centres are the heart of communities and an expression of their culture and identity. As well as shops they should provide a range of realistic functions for leisure, recreation and cultural activities centred on restaurants, pubs, clubs, theatres, cinemas, libraries and museums. As such all these elements play an active role in creating and maintaining vibrant town centres and contributing to a stimulating night-time economy. We suggest that Core Policy 41 is re-written for a County-wide policy to reflect PPS4 Policy EC4.2
4. The Showell Protection Group believe that the proposed industrial park at Showell Farm, Lacock and the proposed massive housing development at Hunters Moon, Patterdown and Rowden will shift the 'centre of gravity' of Chippenham towards the south west and significantly damage attempts to rejuvenate the Chippenham Town Centre.



5. One of the ways in which the vitality and viability of town centres can be enhanced is in allocating housing and employment land where there is good access to the town centre, so that residents and workers can readily frequent the town centre throughout the day and evening. The council's car parking strategy should also be re-examined in the light of this proposed strategic objective. For example, the development of the housing and employment land allocations at Showells Farm will be of considerable benefit to Sainsbury's and to the adjacent fast food and retail outlets, where free parking is available, but are unlikely to enhance the vitality and viability of the Chippenham town centre, access to which is already congested and difficult along the Corsham-Chippenham A4, and where car parking charges apply
6. Core Policy 41 - This policy should specifically state the requirement to retain retail units to ensure the potential viability of town centres and sustainability of local neighbourhoods. - With pressure for loss of retail units in market towns, it is imperative that town centres retain a critical mass of shops. Economic downturn can result in a lack of viability. But the retail stock must be retained to ensure that the critical mass is retained and not lost to residential use. This helps to ensure economic sustainability in the longer term as well as sustainable living patterns for local residents.
7. The existing adopted local plan (West Wilts District Plan adopted 2004) identifies a town centre commercial area within which it separately allocates a primary shopping frontage, the primary shopping use of which is then protected (from changes to Class A2 and A3 uses) by Policy SP4. Taken as a whole it appears that the adopted policy document either treats the 'primary shopping frontages' as a defined 'town centre' or fails to define a town centre boundary for Trowbridge or other towns. Neither approach is a correct interpretation of (then) PPS6 (now PPS4).
8. We consider the conflict and inconsistencies within the adopted plan is a consequence of the local plan not having explicitly defined a town centre boundary and the apparent reliance on defined primary retail frontages as the only focus for town centre uses including retail and leisure. Because the Core Strategy Consultation Document does not define a town centre boundary, for Trowbridge (or elsewhere) it risks undermining the town centre first objectives of PPS4 and the draft NPPF and perpetuating the existing unclear policy context for determining proposed 'town centre uses' development (such as leisure uses), including at St Stephens Place.
9. This is demonstrated by Core Policy 41 of the Core Strategy Consultation Document, which requires "all proposals for retail or leisure uses on sites which are not within a Primary or Secondary Retail Frontage, and are not within a village centre, must be accompanied by an impact assessment" The emerging Core Strategy and its supporting evidence recognise a need for leisure uses within Trowbridge Town Centre and that such uses should sit alongside and support the existing town centre uses. However, the provision of such leisure uses, including a cinema, will not be encouraged by a policy that steers leisure uses to the primary retail frontage.
10. Core Policy 41 conflicts with PPS4 which recognises the Primary Shopping Area (PSA) (usually the primary retail frontage) as the 'town centre boundary' only for consideration of retail (Class A1) proposals. PPS4 does not consider other town centre uses (including Class A3 & A4) to be edge / out-of-centre if they are outside the PSA. Rather national policy encourages such uses within town centres, hence the need to define a town centre boundary which in the context of Trowbridge should include the St Stephen's Place site.
11. Policy EC3.1c of PPS4 and the draft NPPF (para 76) requires town centres to be defined in addition to the primary shopping area, and local planning authorities (LPAs) to subsequently set policies that "make clear which uses will be permitted in such locations". In defining the extent of a town centre, PPS4 also requires that extensions to centres are "carefully integrated with the existing centre". In defining a town centre boundary Policy EC 5 of PPS4 requires the Council to identify suitable sites to deliver identified needs and apply the sequential approach to site selection.
12. The draft NPPF (para 76) requires LPAs to allocate a range of suitable sites to meet, in full, the scale and type of leisure needed in the town centre. For this LPAs are expected to undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites. St Stephen's Place site.

This is an existing site allocated for town centres uses. The site is located close to the PSA and offers the potential to deliver recognised needs for leisure uses, including a cinema, that will enhance the attraction of Trowbridge Town Centre, and strengthen its vitality & viability, including in respect of its night-time economy. It is therefore appropriate for the site to be included within the Trowbridge Town Centre boundary and recognised as the pre-eminent regeneration site within the town centre to deliver leisure uses identified as needed by the Core Strategy and its supporting evidence

13. The Castlemore Retail Park is both adjacent to (retail use) sites that are considered to be within the centre, and is recognised as "easily accessible by foot" and "in easy walking distance of the town centre", it cannot then be concluded that the Castlemore Retail Park is an out-of-centre site. Rather as an existing well established shopping area, that is an integral part of the existing retail function of Warminster, and which provides larger format retail floorspace (otherwise lacking in Warminster) the retail park should be defined as part of Warminster's retail frontage and within a defined Warminster Town Centre
14. Accepts the requirement for Core Policy 41 to comply with national planning policy, requiring development proposals to be accompanied by an impact assessment.
15. Core Policy 41 makes reference to PPS4, although in due course this may need to be revised should PPS4 be replaced by the National Planning Policy Framework.
16. Pleased to see that Core Policy 41 is not too prescriptive over the amount of retail development within the main settlements in Wiltshire and looks forward to working with the Council on more detailed retail policy for Chippenham which identifies a range of suitable, available and viable sites to meet the needs and demand for retail floorspace in the town

## Changes Required

Comments noted. No changes are proposed to the policy as a result of the comments made.

For reasons of clarity and succinctness of the Core Policies, most of the policies relating to retail in each community area have now been incorporated into the text for each area. There is wording in each policy to ensure that the wording in the text is applied to all development proposals in each area.

*'Development proposals in the XXXX Community Area will need to demonstrate how those issues listed in paragraph XXX will be addressed.'*

National planning policy, as set out in Planning Policy Statement 4 – Planning for sustainable economic growth (PPS4), requires local planning authorities to define the extent of a town centre as well as designating primary and secondary retail frontages on the proposals maps and setting policies which make clear which uses will be permitted in such locations. The larger centres of Salisbury, Trowbridge, Chippenham, Amesbury, Bradford on Avon, Calne, Corsham, Cricklade, Devizes, Malmesbury, Marlborough, Melksham, Warminster, Westbury and Wootton Bassett, already have designated frontages and corresponding policies in the relevant District/Local Plans. Any necessary amendments to these frontages and corresponding policies will be identified through the emerging Neighbourhood Planning process or other planning mechanism.

## 4.0 Community Area specific

### 4.1 Chippenham.

The main retail issues identified in the WCSCD for this community area are:

- Chippenham's offer as a service centre needs to be enhanced, particularly the town centre for retail, leisure and the evening economy in order to reduce the outflow of shopping and leisure trips.
- Securing expansion to Chippenham's town centre and improved retail offer through redevelopment of the Bath Road Car Park/ Bridge Centre is key along with redevelopment of other smaller town centre sites and enhancement of the public realm and the market.
- Further out of centre retail development in Chippenham could weaken the town centre and edge of town centre development needs to enhance the offer, not displace it or have a detrimental impact.
- Chippenham has limited brownfield opportunities within its urban area, although significant potential exists for regeneration within the central area.

Core Policy 4 - Chippenham Central Area of Opportunity in the document puts forward some redevelopment sites within Chippenham to help overcome some of the issues.

#### Core Policy 4 - Chippenham Central Area of Opportunity

The redevelopment of the following sites will be delivered as follows:

- i. Bath Road Car Park/Bridge Centre site - to form a retail extension to the town centre.
- ii. Langley Park, Hygrade and Police Station site - appropriate use of the sites to be planned for through the Chippenham Central Area Masterplan.

In addition, the River Avon Corridor will be enhanced for leisure and recreation uses and developed as an attractive cycle/pedestrian route connecting with the town centre. Any development in proximity to the corridor will be required to secure connections to and along the corridor.

Development will be delivered on opportunity sites elsewhere in the central area in accordance with the proposed key principles.

All proposals should meet high quality design and sustainability standards including exemplary public realm and strong pedestrian and sustainable transport links.

## Summary of responses

There were numerous responses to this policy, and they are as follows:

1. In general, I agree with Core Policy 4, but with some important reservations. There is an intent to make Chippenham "A retail destination of choice" and yet the proposal is to reduce the already scarce parking in the central area through redeveloping the most accessible of the three main car parks. Furthermore, it does not make sense to build retail premises in the centre of one of the busiest roundabouts in the town! Perhaps a better alternative would be to make Bath Road a two-story car park and either develop the Borough Parade car park into retail premises, or develop the lower area of Emery Gate. Attention should also be given to analysing the reason why there are so many empty retail properties in the town centre (cost of rent / rates? Cost of parking?) - it would not be an improvement if the additional retail outlets just increase the number of cafes, take-aways or empty units. If a large department store, such as BHS or M&S, were incentivised to come into the town then this would greatly increase the chance of drawing shoppers away from Bath or Swindon.
2. I am wary of the "enhancements" and "development" of the River Avon Corridor- it sounds already that it will lose its natural feel and become a "leisurised" riverside footpath. Obviously the increased traffic and car parking generated by the increased retail provision will be an issue especially for sustainability. Hopefully this new retail provision will not be entirely "clone" type.
3. "focus the retail offer on the town centre " This will only be achieved by lowering the rents of retail properties so that shops become economically viable and by providing ample free parking to attract customers otherwise they will continue to patronise the superstores on the outskirts which do provide these essential facilities.
4. I broadly agree with core principle 4. Development of the Bath Road Car Park and the Bridge Centre site is long over-due. The old Highgrade site would certainly seem an ideal candidate for redevelopment. It has always looked an incredibly tatty eye-sore. The sooner it is demolished and the site put to proper use the better
5. (Core Policy 4) I am generally in agreement with this core policy. However, I believe it should also cover the parking requirements for the town centre and bus/rail stations. Adequate and affordable parking to support enhanced retail and leisure usages and bus/train links is required. Without this the centre will not be accessible to visitors from surrounding areas and the streets of central residential areas (e.g. Monkton Park) will continue to develop as "parking lots" for out-commuters and town centre users.
6. Yes, except that the proposals for the Bath Road Car park /Bridge Centre Development should not compromise traffic flows on one of Chippenham's busiest junctions and should provide parking spaces for the additional shoppers the development is presumably intended to attract.
7. Chippenham: A Newcomer's Impression I moved to Chippenham in 2009. My impressions of the Town Centre are as follows: There are a few historical gems in the town. Unfortunately, the rest of the town has little or no charm. Many shops and areas are really ugly and are, for the most part, dreadful. The shops in the High Street are dingy and uninviting and most could do with a facelift and more skillful window dressing. There are no "little" shops - with their atmosphere or charm. As a result, I would far rather go to surrounding villages or towns such as Corsham, Marlborough and Devizes, to window shop and make purchases. There are far too many coffee shops. Most of them are very ordinary and unappealing. Dutch Cottage is an exception - it has charm and history - and they serve good food. The new coffee shops - Starbucks and Costa have a presence although they are fairly expensive. There are too many cheap and not so cheerful stores. There are too many Charity Shops. There are too many take-way food outlets - the majority of which look totally

unappetising and downright shabby. There are too many furniture shops all selling the same heavy, chunky furniture. The Market in the High Street is pathetic. Many of the stalls are filled with junk. Where are the wonderful traditional stalls such as those in Marlborough, Devizes and Cirencester?

8. Agree the proposed areas of opportunity with the exception that the Bath Road/Bridge Centre site should be mixed employment as so much retail is now done on the internet.
9. The conversion of the Bath Road car park and the Bridge Centre site to a good and large retail centre seems to make sense. However there are some significant problems to consider.
  1. The car park is often full.
  2. How sustainable will a retail centre be?
  3. The recent rise in car parking charges has not helped the viability of the town centre at all.
  4. I totally agree that the traffic problems in Chippenham must be addressed.
10. I agree with the definition of the area. The Bath Road site is crucial for the town and it is vital that any development there connects well with (and supports) the town centre, and does not marginalise New Road shopping. It needs also to be sensitive to the interests of local residents. The section should be strengthened to give a greater priority to town centre regeneration and to checking the flow of business to out-of-town locations. More should be said also about enhancing the quality of the townscape and the contributions of the many interesting buildings that are currently hidden behind ugly hoardings or diminished by the uses being made of them. The designated area rightly includes Station Hill and the train station. The Core Strategy should include the urgent need for a development plan for that area, which has already been damaged by the decision to allow a supermarket 'box' to be built next to the station.
11. The other sites do need to be developed sympathetically but it is difficult to see how the Bridge Centre site could become an attractive retail location given its location in the centre of a busy roundabout. Recently, while walking between the railway Arches and the Town Bridge I counted six business premises that were either closing down or already empty. It is doubtful if building new shops will reverse the decline in the town centre when so many existing premises are empty. The current trend is for weekly shopping trips by car to out of town supermarkets and Sainsburys are about to expand their Bath Road store to answer this demand. The upper end of New Road is an exception as there are a number of thriving small specialist businesses here but this is some distance from the High Street. Part of the Langley Park site was, of course, vacated when Westinghouse Brakes /Knorr Bremse moved to the Hampton Park site in Melksham.
12. In answer to Questions 4: I do agree with the proposed area of opportunity using land at Langley Park with proximity to rail station and M4.
13. I object to the area of opportunity as detailed in the above in question 4 as it does not include the whole of the town centre and does not include in the area south of the station and Cocklebury Road. It is obvious that a road past the station along Cocklebury road to a new Eastern ring road would benefit the town giving a second access to the station and increased access to the town centre. Areas such as the Westinghouse Site would also benefit from this and could be better used. Please therefore include these areas as areas of opportunity.
14. I object to the proposed area of opportunity, as it does not correctly reflect the town centre. The proposed "Town Centre Area" (whilst vaguely shaded) is clearly designed to reflect the proposed option 1 and 2 of development to the South of the town, and has paid not attention to the future interests of the town centre. In producing strategy care must be given to reflect the current town and not bend the future for the convenience of a flawed strategy. Much of the designated area shown as "town Centre" is currently derelict riverbank; it includes part of the "Ivy House" and land on the far side of Avenue La Fleche!!! At the same time it does not include the Post office, St Marys Street, and Emery Gate. Surely these should be included as areas of opportunity? The Borough Parade shopping centre is one of two main

shopping centres in the town. Why has part of it not been included including Tesco's supermarket from this plan. Emery Gate currently turns its back onto Monkton Park - there is potential as identified by Chippenham vision for this should embrace the park and be open on to both the park and river. The area "Town centre" should encompass these areas - the proposed orientation towards Avenue La Fleche and the Bridge centre is obviously there for a reason - but the town centre should continue to focus on its heart and not be diverted from this aim. St Marys Street is one of Chippenham's main assets and it should be integrated in to any town centre regeneration. Whilst I recognise that this is not suitable for wholesale redevelopment - this is one of the areas where the town should have "flavour and atmosphere" it is noted that there is a baby and children's shop and hairdressing salon near the church - these are good local business that can utilise listed buildings in a conservation area. Small service offices such as solicitors and accountants have in the past also occupied these premises - this type of use should be encouraged. The area described as Arches/Hathaway should also increase in size to take in a larger area around the station and up Cocklebury Road. Langley Park should all be included not just a small proportion this is one of the key areas of opportunity in Chippenham.

15. Regeneration of the central area is welcomed. Redevelopment of previously developed land and buildings should be prioritised. Good quality flexible residential and business accommodation or flagship educational or hi-tech enterprise should be encouraged. Strengthening the town centre retail offer in Chippenham is welcomed but no mention is given as to how this will be achieved and no mention is made of the market/street stalls/parking etc. Any retail offer should only be approved if it adds value to the town. Simply increasing the number of shops will not increase the towns vitality and viability - it is the range and quality that needs to be addressed. Independent retailers should be actively encouraged and if appropriate given incentives by the Council to locate in Chippenham.
16. The whole town centre should be included in the area of opportunity not just the rather random balloon shaped areas as shown on the plan. However I strongly object to the suggestion to build houses on the Hygrade site and in Langley Park. Hygrade is less than 100m from Borough Parade and additional parking is desperately needed. Until the parking in the town centre is resolved it would be wrong to allocate the Hygrade site for any other purpose. Langley Park is one of the Chippenham's premier established employment sites. It is held back by poor traffic access and by the owners holding out for more valuable uses for part of the site. The traffic problems will be resolved by the Northern Link road giving easy access to the M4, and clarity in the core strategy will leave the owners in no doubt as to permitted uses. In planning these uses it should be remembered that the town badly needs a multiscreen cinema and the south west end of Langley Park, adjoining Hathaways, is the only central location which could easily accommodate it. Also, whilst plans for an Asda have been resisted by the planners, it would be better it have one here close to the centre than on the ring road drawing people out of the town. The town urgently needs a comprehensive masterplan to deal with all these and other issues, and to blindly suggest building houses on these critical central sites, just because they tick the "brownfield" box, is deeply irresponsible.
17. Support Core Policy 4 which identifies Langley Park in the Central Area of Opportunity and as a site planned for redevelopment and improvement. AIFLP is particularly pleased to see that Langley Park has been acknowledged as part of the central area of Chippenham. AIFLP is keen to work with the Council and the Chippenham Vision Board to help develop for the Chippenham Central Area Masterplan which will contribute to delivering the aspirations of local people. It is important to recognise the need for mixed used areas which are easily accessible and appropriate for the local area. A balance of land uses and a greater variety should be an important feature of a development which seeks to integrate such uses. AIFLP considers that the Langley Park estate as a whole has the potential to deliver mixed use

redevelopment, comprising residential, retail, residential, employment and other commercial land uses, which will lie on the northern edge of the town centre and close to Chippenham's railway station. AIFLP note the proposals for Bath Road/Bridge Centre. Whilst this may be an opportunity site, the Core Strategy should be clearer about the type of retail uses which can be provided in this location and be realistic about the opportunity that this site provides. Indeed, the Bath Road site is unlikely to be the only site required to meet retail needs in Chippenham and the Langley Park site also offers a suitable, available and viable opportunity to improve the retail offer of the town.

18. The proposed areas of opportunity described in Core Policy 4 are supported. However three changes should be made: 1) the wording 'the redevelopment of the following sites will be delivered as follows:' implies a) that all the sites identified have to be redeveloped (rather than improved) and b) that there is a sequential approach to the delivery of these sites. i.e. Bath Road car park first, Langley Park, Hygrade and Police Station site, second. The development of these sites could involve improvements to existing uses as well as renewal (for example, retention of some businesses on Langley Park). The developments could also be delivered mutually exclusive and do not need to be inter-linked. Indeed, the development of these sites could be hindered unnecessarily as a result. The policy should therefore be re-worded as follows: "The re development of the following sites will be delivered: as follows: "
  - 2) In association with the changes proposed at (1), the Area of Opportunity (ii) (Langley Park, Hygrade and Police Station site) should also include reference to Hathaway otherwise it is unclear why the corresponding Map 5.2 indicates an Arches/Hathaway Area of Improvement. Map 5.2 should also extend the Arches/Hathaway Area of Improvement notation to include the whole of the Hathaway Retail Park Site.
  - 3) For consistency with Area of Opportunity (i), the Area of Opportunity (ii) (Langley Park, Hathaway, Hygrade and Police Station site) should also broadly confirm what uses could be delivered on these sites. The reference could be re-worded as follows: "Langley Park, Hathaway , Hygrade and Police Station site - appropriate use of the sites to be planned for through the Chippenham Central Area Masterplan but to include employment, residential, retail, community or leisure uses, or a mix of such uses .
19. OBJECT Bath Road Car Park should not form a retail extension to the town centre. It should be retained as a Car Park. Car parking provision adjacent to the town centre is inadequate now
20. I strongly OPPOSE the Vision point of view, which want 'major developments near the river'. First, make use of existing river frontage in the town centre, which seems to turn its back on the river. I cannot think what Vision means by 'developments near the river maximising the attractive incorporation and use of the river within the scheme' - WHICH SCHEME. Parking is a problem, yet I read Bath Road Car Park is to form a retail extension. There is no mention of alternative parking plans. There is mention of the 'Chippenham Central Area Masterplan' - which I have not seen, nor would know how to access. But it sounds like another Vision, undemocratic, stakeholder plan. Have residents of the area been asked? Vision keep pushing for bigger and better retail opportunities in the Town; going on past evidence, this is deeply depressing, as it does not deliver what most people want unless they drink coffee, want to update their mobile phones or buy in a Poundshop.

## Changes Required

Comments noted. No changes are proposed to the policy as a result of the comments made.

National planning policy, as set out in Planning Policy Statement 4 – Planning for sustainable economic growth (PPS4), requires local planning authorities to define the extent of a town centre as well as designating primary and secondary retail frontages on the proposals maps and setting policies which make clear which uses will be permitted in such locations. The larger centres of Salisbury, Trowbridge, Chippenham, Amesbury, Bradford on Avon, Calne, Corsham, Cricklade, Devizes, Malmesbury, Marlborough, Melksham, Warminster, Westbury and Wootton Bassett, already have designated frontages and corresponding policies in the relevant District/Local Plans.

Any necessary amendments to these frontages and corresponding policies will be identified through the emerging Neighbourhood Planning process or other planning mechanism.

### 4.2 Trowbridge.

The main retail issues identified in the WCSCD for this community area are:

- Delivering housing growth will also strengthen the viability for new and improved entertainment and cultural facilities in the town, such as a cinema. Ensuring growth is balanced between the central and edge of town areas will also deliver an improved evening economy, such as restaurants in the town centre, particularly adjacent to the River Biss corridor. Town centre growth should be a priority with greenfield development being phased towards the end of the plan period. Although the regeneration of the Trowbridge Vision sites provides an opportunity to deliver improved leisure facilities (e.g. a new leisure centre), further work is needed to investigate how additional formal sports pitches and courts provision can be delivered in the town.
- The Trowbridge Vision will deliver improvements to the central area of Trowbridge through regenerating key sites and the Wiltshire Core Strategy provides support for this work through Core Policy 7. The vision will, amongst other things, deliver improvements to the rail station providing a new gateway to Trowbridge and improved public transport connectivity. The regeneration of centrally located vacant sites will improve the services and facilities the town needs and provide new employment uses. Sustainable and coherent regeneration of Trowbridge town centre is needed, to maximise the potential of vacant sites, to improve pedestrian linkages and to enhance the quality of the public realm.
- Trowbridge is well provided for in terms of its convenience (food) retail offer and there is no capacity for additional major food retail during the plan period and this will not be supported. There is however, considerable opportunity for additional comparison (non food) provision. Recent edge of centre retail development in Trowbridge has led to the repositioning of the town centre and future development should be focused in central locations around the Trowbridge Vision sites described below.
- There are strong functional interrelationships between Trowbridge, Frome and Westbury, particularly for retail. Strategic growth in Trowbridge can strengthen the employment role of Trowbridge for the wider area and provide a complimentary retail offer to that provided by the nearby higher order centre of Bath.



Core Policy 6 - Trowbridge Vision Areas of Opportunity in the document puts forward some redevelopment sites within Trowbridge to help overcome some of the issues.

#### Core Policy 6 - Trowbridge Vision Areas of Opportunity

1. High quality and sustainable development will be permitted on the areas of opportunity identified in the Trowbridge town centre master plan providing that proposals fully reflect those uses set out within the Master Plan and contribute to the wider vision for the town centre.
2. Proposals should meet high quality design and sustainability standards including exemplary public realm and strong pedestrian and sustainable travel linkages as set out in the Master Plan.
3. Proposals for major development must be designed with the ability to connect to the Trowbridge energy network. Where this is deemed not to be viable, the evidence for this should be fully demonstrated within the sustainable energy strategy as set out by Core Policy 26.

## Summary of responses

There were numerous responses to this policy, and they are as follows:

1. Priority should be given to the centre of Trowbridge to keep knees and shops in that area busy. Forget the huge parking charges, which are clogging the side roads, and making people use supermarkets. Don't neglect the old town hall, the one distinctive building in the centre of town. Develop the Bowyer Site which is close to the railway and shops- it's the perfect place to develop not fields!!
2. In general we agree with the Trowbridge Vision Areas of Opportunity. One change we wish to see is to paragraph 5.3.3. 10th bullet point. We agree that Trowbridge Community Area is well provided for in terms of its convenience (food) retail offer. However, we believe that one more store would be acceptable and viable, with the proviso that the most desired leisure features (a cinema and bowling) can be achieved BEFORE or CONCURRENTLY WITH another supermarket. NB Trowbridge Further Education College became Wiltshire College (Trowbridge Campus) several years ago!!
3. Trowbridge needs a top high street operator. Why not encourage marks and spencer back into Trowbridge. Their express store was well received and successful until they departed. The county town should have a "fine shop" operator which will attract others.
4. We support the findings of the Wiltshire Town Centre and Retail Study (2011), and the Core Strategy view, that Trowbridge is well provided for in terms of its convenience retail offer, that there is no capacity for additional major food retail during the plan period and that such proposals should not be supported. We support Core Policy 6 (Trowbridge Vision Areas of Opportunity) in terms of the proposals to improve linkages between the new Sainsbury's store and other shops and services within the Town Centre. We also request that consideration be given to redefining the designated Primary Retail Frontage such that the existing Sainsbury's store is included within it. The store is currently located outside, but close to, the designated Primary Retail Frontage. We consider that, given the retail function of the Sainsbury's site and the high quality of linkage it enjoys with the Primary Retail Frontage, it would be appropriate to extend the town's Primary Retail Frontage to include the new foodstore.

## Changes Required

Support for the policy is welcome and no changes are proposed as a result of the comments made.

For reasons of clarity and succinctness of the Core Policies, most of the policies relating to retail in each community area have now been incorporated into the text for each area. There is wording in each policy to ensure that the wording in the text is applied to all development proposals in each area.

*'Development proposals in the XXXX Community Area will need to demonstrate how those issues listed in paragraph XXX will be addressed.'*

National planning policy, as set out in Planning Policy Statement 4 – Planning for sustainable economic growth (PPS4), requires local planning authorities to define the extent of a town centre as well as designating primary and secondary retail frontages on the proposals maps and setting policies which make clear which uses will be permitted in such locations. The larger centres of Salisbury, Trowbridge, Chippenham, Amesbury, Bradford on Avon, Calne, Corsham, Cricklade, Devizes, Malmesbury, Marlborough, Melksham, Warminster, Westbury and Wootton Bassett, already have designated frontages and corresponding policies in the relevant District/Local Plans. Any necessary amendments to these frontages and corresponding policies will be identified through the emerging Neighbourhood Planning process or other planning mechanism.

### 4.3 Bradford on Avon.

There are no retail specific issues in this community area

### 4.4 Calne

There are no retail specific issues in this community area

### 4.5 Corsham

The main retail issues identified in the WCSCD for this community area are:

- There are opportunities for some additional comparison retail in Corsham as this would better cater for the needs of local residents and help reduce trips by car to other destinations. However, there is no scope for additional convenience retail provision at Corsham.
- The delivery of a proposed leisure campus in Corsham will provide enhanced community facilities in the town centre and help to strengthen the overall offer of the town.

Core Policy 11 - Spatial Strategy: Corsham Community Area in the document establishes what is needed in this community area to help overcome some of the issues. The text below is just the text that relates to retail within the policy.

### Core Policy 11 - Spatial Strategy: Corsham Community Area

- Development proposals should be mixed, contributing a range of employment, comparison retail or other community services and helping to improve the self sufficiency of the town. Priority should be afforded to the re-use of brownfield sites.
- Proposals for the redevelopment of former MOD sites which are well related to the town will be supported. Redevelopment of the redundant MOD sites at Copenacre and Rudloe should come forward together to ensure proposed uses are complementary. A masterplan should be prepared for each site in conjunction with the community. It should be clearly demonstrated that the proposals will be well integrated to the existing settlement and provide enhancements to the character of the area.
- Opportunities for additional comparison retail provision in the central area of Corsham will be supported providing it is clearly demonstrated how the proposals will integrate to the existing fabric of the town centre and provide enhancement to the town centre.

## Summary of responses

There were 2 respondents to this question and the responses were:

1. We consider that there is a qualitative need for additional convenience floorspace in Corsham.
2. Given the emphasis on the existing imbalance between housing and services & facilities and the advent of neighbourhood plans, it is not really appropriate to prescribe the retail provision at this stage

## Changes Required

Comments noted. No changes are proposed to the policy as a result of the comments made.

For reasons of clarity and succinctness of the Core Policies, most of the policies relating to retail in each community area have now been incorporated into the text for each area. There is wording in each policy to ensure that the wording in the text is applied to all development proposals in each area.

*'Development proposals in the XXXX Community Area will need to demonstrate how those issues listed in paragraph XXX will be addressed.'*

## 4.6 Devizes

The main retail issue identified in the WCSCD for this community area is:

- The irregular street pattern in Devizes centre provides a unique and attractive retail environment, although it does also limit the potential for developing new larger format retailers. However, the development of the Central Car Park area could provide additional small scale comparison retail provision in Devizes, although this should be successfully integrated within the fabric of the town centre.

Core Policy 12 - Spatial Strategy: Devizes Community Area in the document establishes what is needed in this community area to help overcome some of the issues. The text below is just the text that relates to retail within the policy.

Core Policy 12 - Spatial Strategy: Devizes Community Area

Proposals for comparison retail at the Central Car Park site will be supported providing it is clearly demonstrated how this will be integrated with, and provide enhancement to, the fabric of the existing town centre.

## Summary of responses

There were 6 specific responses to this question and they are:

1. 5.8.4 Refers to the retail sector. Devizes is mostly liked by shoppers for its range of individual smaller and specialist shops. The existence of smaller branches of the likes of Tesco and Marks and Spencer brings in people from outlying villages but is not an attraction to people from further afield. Any attempt to bring in larger branches of national retailers would destroy the special character of the town. Previous proposals to develop on the central car parks to attract such retailers are mistaken and would be very damaging to the character and amenities of the town and should be strongly resisted. Lack of parking space close to the shops and high parking charges are detrimental to the local economy, as has now been recognised by central government. In recent years, shoppers from other Wiltshire towns are known to have been deterred from visiting Devizes because of its traffic congestion. Seriously long delays can occur whenever accidents or road works add to the normal traffic congestion because of the inadequate road infrastructure.
2. The town's retail success comes from having many independent retailers. The town has enough chain stores (ref: 'clone town' survey). Retailers wishing to do business in Bath seems to manage with Georgian shops, so retailers should manage with the Devizes historic buildings also.
3. The suggestion that Central Car Park should be built on to provide retail outlets is astounding! It's the main car park in Devizes! Where is everyone who currently lives in Devizes to go if this is lost, never mind the extra traffic generated by the proposed new housing and employment developments! I suggest you leave it as it is!
4. Objective 7 talks of locating appropriate retail, leisure and employment opportunities in town centres. Whilst we would agree that retail should be concentrated in the town centre, active leisure activities need to be located where there is space and the location of employment depends on the type of business, with many situated on the industrial and business estates.
5. Object to more retail in the Central Car Park site.
6. Key areas of importance for Devizes: Retail - The presumptions are based on growth in the sector whereas expert views suggest the reverse is likely because of increased on-line buying. The view is that some specialists shops will survive by virtue of personal or niche offerings but, for example, literature specialists (Handel Books v Reading Matters v WH Smith) and health foods (Holland and Barrett v Boots v Julian Graves v Superdrug) might be under threat. The question of redeveloping Central Car Park - a hangover from the Gillespie Consultations commissioned by KDC five years ago - remains on the table.

## Changes Required

Comments noted. No changes are proposed to the policy as a result of the comments made.

For reasons of clarity and succinctness of the Core Policies, most of the policies relating to retail in each community area have now been incorporated into the text for each area. There is wording in each policy to ensure that the wording in the text is applied to all development proposals in each area.

*'Development proposals in the XXXX Community Area will need to demonstrate how those issues listed in paragraph XXX will be addressed.'*

National planning policy, as set out in Planning Policy Statement 4 – Planning for sustainable economic growth (PPS4), requires local planning authorities to define the extent of a town centre as well as designating primary and secondary retail frontages on the proposals maps and setting policies which make clear which uses will be permitted in such locations. The larger centres of Salisbury, Trowbridge, Chippenham, Amesbury, Bradford on Avon, Calne, Corsham, Cricklade, Devizes, Malmesbury, Marlborough, Melksham, Warminster, Westbury and Wootton Bassett, already have designated frontages and corresponding policies in the relevant District/Local Plans. Any necessary amendments to these frontages and corresponding policies could be identified through the emerging Neighbourhood Planning process or other planning mechanism.

### 4.7 Malmesbury

The main retail issue identified in the WCSCD for this community area is:

- There is a lack of convenience retail offer in the town centre and many residents travel outside of the community area to shop for day to day needs. There may be scope for some convenience development of an appropriate scale during the plan period but work would need to be undertaken to assess impact on the town centre and to ensure that any proposal addresses transport issues in the town.

Core Policy 13 - Spatial Strategy: Malmesbury Community Area in the document establishes what is needed in this community area to help overcome some of the issues. The text below is just the text that relates to retail within the policy.

#### Core Policy 13 - Spatial Strategy: Malmesbury Community Area

Any proposals for major new retail development should contribute towards the enhancement of the town centre

1. You mention a lack of convenience retail in the town centre. - Again, I completely agree. This is largely due to the introduction of parking charges, however there are 2 other aspects: a) We have a choice of a fairly limited co-op or ... an even more limited co-op... What Malmesbury does NOT need is ANOTHER new supermarket (eg) on the bypass on top of the 2 existing ones to take trade from the high street shops. What it DOES need is a better quality store to replace the co-op opposite the fire station.

2. I was told at the exhibition that it has been established that Malmesbury needs a supermarket. By whom? Does the council want to kill off what shops we have left in the High Street - because that is what happens - one stop shopping - free car parking
3. At the recent public consultation talk was about a new supermarket for Malmesbury. We do not want or need this, this would kill our town centre completely. We need to be supporting our local traders and encouraging more diversity in the town centre to ensure that local people can purchase all they need for everyday living within the town and not have to travel to out of town superstores.
4. Supermarkets all around Malmesbury. Having another here would not increase competition sufficiently to reduce prices but would encourage those that currently use the town to stay outside
5. We support the Council's acknowledgement that there is a lack of convenience retail offer in Malmesbury town centre and that many residents currently have to travel outside the community area to shop for their day-to-day needs. As such, there is scope for some convenience retail development of an appropriate scale during the plan period.

## Changes Required

Comments noted. No changes are proposed to the policy as a result of the comments made.

For reasons of clarity and succinctness of the Core Policies, most of the policies relating to retail in each community area have now been incorporated into the text for each area. There is wording in each policy to ensure that the wording in the text is applied to all development proposals in each area.

*'Development proposals in the XXXX Community Area will need to demonstrate how those issues listed in paragraph XXX will be addressed.'*

## 4.8 Marlborough

There are no retail specific issues in this community area

## 4.9 Melksham

The main retail issues identified in the WCSCD for this community area are:

- Residential growth in Melksham should help address the shortfall in affordable housing and contribute towards delivering improved infrastructure. In particular, growth should contribute towards town centre regeneration and the revitalisation of the retail and employment offer.
- Improving Melksham's town centre is a priority and the preparation of a 'town plan' or similar document (e.g. neighbourhood plan), may provide a useful step to help achieve the aspirations of the local community. Wherever possible, key community services and facilities should be located within or well related to the town centre to help promote and deliver the requisite regeneration.

- Although, there is limited scope for any further convenience retail provision in the town, there is potential for expansion of comparison retailing, although this should be focused in the central area of the town to support town centre regeneration.

Paragraph 5.11.6, Melksham town centre regeneration establishes what is needed in this community area to help overcome some of the issues.

#### Melksham town centre regeneration

5.11.6 Regeneration of Melksham town centre is a priority, and this should include a focus on improving the setting of the historic environment. The preparation of a 'town plan', which could be adopted as a supplementary planning document (SPD), or other similar document (e.g. a neighbourhood plan), may offer an opportunity to assist in the delivery of town centre regeneration. Wherever possible, key community services and facilities should be located within or well related to the town centre to assist with regeneration aims for the town in accordance with national planning policy.

## Summary of responses

There were 7 specific responses to this question and they are:

1. We seek the redefinition of the designated Primary Retail Frontage to include the existing Sainsbury's store. The store is currently located outside, but close to, the designated Primary Retail Frontage. We consider that, given the retail function of the Sainsbury's site (and the high quality of linkage it enjoys with the Primary Retail Frontage) it would be appropriate to extend the town's Primary Retail Frontage to include the foodstore.
2. The Town Council accepts that regeneration of the town centre is a priority, and would wish to explore how a town plan or similar document may assist in delivery of town centre regeneration.
3. Town Plan for Melksham should consider land use and regeneration opportunities in the River Avon corridor.
4. The council should emphasise this link between the canal and regeneration, especially where it will bring additional tourist traffic and general interest, together with an improved environment, to the centre of the town alongside the River Avon.
5. Paragraph 5.11.6 could be split into two statements, one focussing on regenerating Melksham Town Centre and the other focussing on the restoration of the Wilts and Berks Canal.
6. Concern about roadworks in the town centre and loss of one hour free parking from town centre car park combined with new ASDA removing trade from town centre. Resulting in loss of quality shops.
7. Current state of Melksham is very depressing. Town centre is dying – people go to supermarkets instead.

## Changes Required

Comments noted. No changes are proposed to the text as a result of the comments made.

For reasons of clarity and succinctness of the Core Policies, most of the policies relating to retail in each community area have now been incorporated into the text for each area. There is wording in each policy to ensure that the wording in the text is applied to all development proposals in each area.

*'Development proposals in the XXXX Community Area will need to demonstrate how those issues listed in paragraph XXX will be addressed.'*

National planning policy, as set out in Planning Policy Statement 4 – Planning for sustainable economic growth (PPS4), requires local planning authorities to define the extent of a town centre as well as designating primary and secondary retail frontages on the proposals maps and setting policies which make clear which uses will be permitted in such locations. The larger centres of Salisbury, Trowbridge, Chippenham, Amesbury, Bradford on Avon, Calne, Corsham, Cricklade, Devizes, Malmesbury, Marlborough, Melksham, Warminster, Westbury and Wootton Bassett, already have designated frontages and corresponding policies in the relevant District/Local Plans. Any necessary amendments to these frontages and corresponding policies could be identified through the emerging Neighbourhood Planning process or other planning mechanism.

## 4.10 Pewsey

There are no retail specific issues in this community area

## 4.11 Tidworth and Ludgershall

The main retail issues identified in the WCSCD for this community area are:

- Further improvements to the retail offer of Tidworth and Ludgershall is a priority for this strategy to help improve the self-sufficiency of the area. Regeneration of the town centres is particularly important as it is currently poorly defined and suffers from a lack of continuity associated with an overall lack of design standards within certain areas. These centres also have a generally weaker retail offer than for comparable sized nearby market towns

Core Policy 17 - Spatial Strategy: Tidworth and Ludgershall Community Area in the document establishes what is needed in this community area to help overcome some of the issues. The text below is just the text that relates to retail within the policy.

### Core Policy 17 - Spatial Strategy: Tidworth and Ludgershall Community Area

Proposals for additional retail provision in Tidworth and Ludgershall will be supported providing they are centrally located, clearly integrated with the existing centres and provide significant enhancement to the existing offer.

For reasons of clarity and succinctness of the Core Policies, most of the policies relating to retail in each community area have now been incorporated into the text for each area. There is wording in each policy to ensure that the wording in the text is applied to all development proposals in each area.

*'Development proposals in the XXXX Community Area will need to demonstrate how those issues listed in paragraph XXX will be addressed.'*



## 4.12 Warminster.

The main retail issues identified in the WCSCD for this community area are:

- Regeneration of the central area of Warminster is identified as a priority and a town plan is being prepared, which is being led by the community. This may be adopted as Supplementary Planning Document (or a Neighbourhood Plan) in the future. As it stands, the focus for the Town Plan is to strengthen and re-define the identity of the retail core of the town centre, including:
  - the provision of suitable premises for larger format comparison retailers;
  - rationalisation of parking provision;
  - improvements to public transport connectivity; and
  - improved pedestrian linkages.
- The proposals set out in the Warminster Town Plan are supported by the council. Proposals for the Central Car Park site, in particular, provide an opportunity to effectively integrate new comparison retail provision within the existing fabric of Warminster town centre. It is clear that the car park area is currently under-used and offers a unique opportunity to improve the retail offer to enhance the vitality and viability of the town centre overall.
- Where possible, key community services and facilities should be retained in the town centre, to assist with the aims of enhancing the central area of the town, in accordance with national planning policy.

Core Policy 18 - Spatial strategy: Warminster Community Area in the document establishes what is needed in this community area to help overcome some of the issues. The text below is just the text that relates to retail within the policy.

### Core Policy 18 - Spatial strategy: Warminster Community Area

Proposals set out within the Warminster Town Plan will be supported, providing they are consistent with the policy framework set out in the Wiltshire Core Strategy. Proposals for new comparison retail provision on the Central Car Park site will be supported providing it is clearly demonstrated how the proposals integrate with the existing fabric of the town centre, provides high quality public realm and pedestrian linkages and provides enhancement to the existing central area.

There was 1 specific response to this policy and it is:

1. This policy states that the Council will support proposals set out within the Warminster Town Plan, providing they are consistent with the policy framework set out within the Core Strategy. However, there is no Core Strategy policy framework in respect of retail and town centres uses in Warminster, other than Core Policy 41. Core Policy 41 conflicts with PPS4 (as our representation in respect of St Stephen's Place, Trowbridge refers). In any event, Core Policy 41 requires primary (and secondary) retail frontages to be defined (in accordance with PPS4) but none are defined by the Core Strategy. It is the role of the Core Strategy to provide a clear strategic policy framework - that includes a correctly defined town centre and retail frontage (having regard to available evidence, including existing uses and commitments). If it

fails to do this, the Core Strategy will in effect defer its strategic planning obligations to the Warminster Town Plan, which would be clearly inappropriate.

## Changes Required

Comments noted. No changes are proposed to the policy as a result of the comments made.

For reasons of clarity and succinctness of the Core Policies, most of the policies relating to retail in each community area have now been incorporated into the text for each area. There is wording in each policy to ensure that the wording in the text is applied to all development proposals in each area.

*'Development proposals in the XXXX Community Area will need to demonstrate how those issues listed in paragraph XXX will be addressed.'*

National planning policy, as set out in Planning Policy Statement 4 – Planning for sustainable economic growth (PPS4), requires local planning authorities to define the extent of a town centre as well as designating primary and secondary retail frontages on the proposals maps and setting policies which make clear which uses will be permitted in such locations. The larger centres of Salisbury, Trowbridge, Chippenham, Amesbury, Bradford on Avon, Calne, Corsham, Cricklade, Devizes, Malmesbury, Marlborough, Melksham, Warminster, Westbury and Wootton Bassett, already have designated frontages and corresponding policies in the relevant District/Local Plans. Any necessary amendments to these frontages and corresponding policies could be identified through the emerging Neighbourhood Planning process or other planning mechanism.

### 4.13 Westbury

The main retail issues identified in the WCSCD for this community area are:

- the focus for development away from Station Road will be to help facilitate the delivery of town centre enhancement and improved community facilities through financial contributions. Retail expansion in Westbury is not appropriate, with the focus instead being on protecting the existing independent sector and enhancing the town centre with stronger linkages between areas which currently feel fragmented and by improving the public realm. These issues are being addressed more directly through a Town Planning process which is being led by the community.
- The enhancement of Westbury town centre is a priority for the community who are leading a town planning process. The preparation of a town plan, which could be adopted as SPD, or other similar document (e.g. a Neighbourhood Plan) may offer an opportunity to assist in the delivery of town centre enhancement. The town has a strong independent retail sector and contains many important historical buildings. However, the central area of the town currently feels fragmented and its quality overall is weakened by the post war shopping arcade, which is not in character with the rest of the town centre. Re-developing and shaping the High Street precinct with a more organic street pattern containing a mix of uses, mainly retail and residential, would help to substantially improve the central area of the town.
- Contributions from future development should be focused on delivering enhancement to the town centre in line with the emerging community led town planning work. A Westbury Vision

and Scoping Study identifies a number of key recommendations for strengthening the town centre. Where possible, key community services and facilities should be retained in the town centre, to assist with the aims of enhancing the central area of the town, in accordance with national planning policy.

Core Policy 19 - Spatial strategy: Westbury Community Area in the document establishes what is needed in this community area to help overcome some of the issues. The text below is just the text that relates to retail within the policy.

#### Core Policy 19 - Spatial strategy: Westbury Community Area

Proposals for development in Westbury should demonstrate how they will contribute to the enhancement of the central area of the town, in accordance with the community led town planning process. The re-development of the High Street precinct will be supported, providing this provides a high quality traditional street pattern and is in keeping with the historic character of Westbury. It should be demonstrated how any new retailing proposed would not negatively impact on the vitality of the existing retail offer.

## Analysis of responses

There were 2 specific responses to this question and they are:

1. The statement in 5.18.5 that retail expansion in Westbury is not appropriate seems to be at odds with the statement in 5.18.1 that larger retailers are lacking. While I support the protection of the existing independent retailers I would not like to close the door to larger retailers who could complement existing businesses and provide investment in the town. 8. I would like to see positive statements on how small retailers are to be protected; this week yet another business has folded apparently blaming the parking charges as a significant cause; how to restore free parking needs to be addressed.
2. It is considered that the Wiltshire Town Centres and Retail Study (March 2011) provides evidence of a qualitative need for a new, modern supermarket in Westbury. Existing facilities do not adequately meet the main food shopping requirements of residents thereby giving rise to leakage of expenditure. Accordingly, the Core Strategy should make provision for improved foodstore facilities to be provided in line with the sequential approach and retail impact policy tests required by PPS4.

## Changes Required

Comments noted. No changes are proposed to the policy as a result of the comments made.

For reasons of clarity and succinctness of the Core Policies, most of the policies relating to retail in each community area have now been incorporated into the text for each area. There is wording in each policy to ensure that the wording in the text is applied to all development proposals in each area.

*'Development proposals in the XXXX Community Area will need to demonstrate how those issues listed in paragraph XXX will be addressed.'*

#### **4.14 Royal Wootton Bassett.**

There are no retail specific issues in this community area.

# 5.0 National Planning Framework

Since the WCSCD has been out for consultation, the government have published the draft national planning policy framework. This is intended to replace the existing planning guidance with one document. Within the 'Planning for prosperity' section, there is still the need to promote the vitality and viability of town centres. The following table assesses whether the document as written complies with the draft NPF, and if not, what changes would be needed in order to conform with it.

Draft National Planning Policy Framework	Wiltshire Core Strategy Consultation Document	General Conformity / change required.
<p>76. Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. Local planning authorities should:</p> <ul style="list-style-type: none"> <li>recognise town centres as the heart of their communities and pursue policies to support the viability and vitality of town centres</li> </ul>	<p>Strategic Objective 7 recognises the importance of the vitality and viability of Wiltshire's city, town and village centres. Core policy 1 sets out the settlement strategy which directs growth to the key settlements.</p>	<p>Conforms to this part of the Draft National Planning Policy Framework.</p>
<ul style="list-style-type: none"> <li>define a network (the pattern of provision of centres) and hierarchy (the role and relationship of centres in the network) of centres that is resilient to anticipated future economic changes</li> </ul>	<p>Core policy 1 sets out the settlement strategy which directs growth to the key settlements.</p>	<p>Conforms to this part of the Draft National Planning Policy Framework.</p>
<ul style="list-style-type: none"> <li>recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites</li> </ul>	<p>This is acknowledged in the core strategy in CP 6, Trowbridge vision areas of opportunity, which has a range of sites within Trowbridge that will have mixed use development at its heart.</p>	<p>Conforms to this part of the Draft National Planning Policy Framework.</p>
<ul style="list-style-type: none"> <li>allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, community</li> </ul>	<p>A range of sites has been identified in the key settlements.</p>	<p>Conforms to this part of the Draft National Planning Policy Framework.</p>

Draft National Planning Policy Framework	Wiltshire Core Strategy Consultation Document	General Conformity / change required.
<p>services and residential development needed in town centres. It is important that retail and leisure needs are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites</p>		
<ul style="list-style-type: none"> <li>• allocate appropriate edge of centre sites where suitable and viable town centre sites are not available, and if sufficient edge of centre sites cannot be identified, set policies for meeting the identified requirements in other accessible locations; and</li> </ul>	<p>A range of sites has been identified in the key settlements.</p>	<p>Conforms to this part of the Draft National Planning Policy Framework.</p>
<ul style="list-style-type: none"> <li>• set policies for the consideration of retail and leisure proposals which cannot be accommodated in or adjacent to town centres.</li> </ul>	<p>A range of sites has been identified in the key settlements.</p>	<p>Conforms to this part of the Draft National Planning Policy Framework.</p>
<p>77. Local planning authorities should apply a sequential approach to planning applications for retail and leisure uses that are not in an existing centre and are not in accordance with an up to date Local Plan.</p>	<p>Paragraph 6.7.5 of the document sets out that the sequential approach should be followed.</p>	<p>Conforms to this part of the Draft National Planning Policy Framework.</p>
<p>78. Local planning authorities should prefer applications for retail and leisure uses to be located in town centres where practical, then in edge of centre locations</p>	<p>Paragraph 6.7.5 of the document sets out that the sequential approach should be followed.</p>	<p>Conforms to this part of the Draft National Planning Policy Framework.</p>

Draft National Planning Policy Framework	Wiltshire Core Strategy Consultation Document	General Conformity / change required.
<p>and only if suitable sites are not available should out of centre sites be considered. In applying this sequential approach, local planning authorities should ensure that potential sites are assessed for their availability, suitability and viability and for their ability to meet the full extent of assessed quantitative and qualitative needs.</p>		
<p>79. When assessing applications for retail and leisure 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.</p>	<p>Paragraph 6.7.5 sets out a local threshold of 200 sq m for impact assessments</p>	<p>Conforms to this part of the Draft National Planning Policy Framework.</p>

