



# Local Development Plan 2021 > 2036

Cardiff Council - January 2025

Background Technical Paper Number 3

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## Deposit Plan

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### Retail

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# **Cardiff Replacement Local Development Plan Deposit Plan 2021 to 2036**

## **Background Technical Paper Number 3**

### **Retail**

**January 2025**

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## **Introduction**

- 1.1 In 2022, Cardiff Council commissioned Nexus to prepare a Retail and Commercial Leisure Assessment Study to inform the preparation of the Replacement Local Development Plan 2021-2036 (RLDP) and provide the Council with an up-to-date, objective assessment of retail and leisure development needs in Cardiff and consider possible strategic policy responses to any prevalent or emerging issues.
- 1.2 The Study reflects the requirements of Planning Policy Wales and Technical Advice Note (TAN 4): Retail and Commercial Development (2016) and is informed by the relevant policy context of the Adopted Local Development Plan, Food Drink and Leisure SPG (2017) and Consultation Paper on Draft Vision, Issues and Objectives (2021).
- 1.3 The Study summarises the key current and future retail trends; reviews existing market shares across the study area, as informed by the telephone Household Survey comprising 2,052 interviews split into 18 Zones and summarises the key findings on internet shopping patterns as well as a survey-derived market share analysis for convenience and comparison goods spending at bricks and mortar locations and a series of quantitative assessments has been undertaken to understand what, if any, gaps there are in local retail and leisure provision.
- 1.4 The study also provides detailed health check assessment for the city centre, the 11 district centres and 22 local centres and examined whether the adopted Retail Hierarchy remains sound.
- 1.5 This Background Paper provides a review of the Nexus Study and the recommendations to inform the Replacement Local Development plan on the hierarchy of centres based on their role and function and how the sequential test is applied in relation to the 'town centre first' approach, the need for additional centres, the special extent of existing centres, the direction for retail development (comparison, convenience and leisure) over the plan period to 2036 and; the recommended planning policy approach for the Replacement Local Development Plan

## **Legislative And Policy Context**

- 2.1 The following sections set out the legislative and policy framework relevant to planning for retail and main town centre uses and the consideration of new development proposals within Cardiff City Centre, District Centres and Local Centres.

### **THE WELL-BEING OF FUTURE GENERATIONS (WALES) ACT (2015)**

- 2.2 The Well-being of Future Generations (Wales) Act (2015) is concerned with improving the social, economic, environmental, and cultural well-being of Wales. It requires the public bodies listed in the Act to think more about the long-term, work better with people, communities, and each other, look to prevent problems and take a

collaborative approach to working. The Act puts in place seven well-being goals under a range of headings.

- A prosperous Wales
- A resilient Wales
- A healthier Wales
- A more equal Wales
- A Wales of cohesive communities
- A Wales of vibrant culture and thriving Welsh language
- A globally responsive Wales.

2.3 The Act places a duty on the Council to take reasonable steps in exercising its functions to meet the wellbeing objectives set out above. and has been prepared as part of the Council's duty and the 'sustainable development principle,' as set out in the Act and has sought to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs.

#### **Future Wales: The National Plan 2040**

2.4 Future Wales: The National Plan 2040 is the national spatial plan which sets the direction for where development in Wales should occur up to 2040 building upon the key objectives of Planning Policy Wales. It outlines the Welsh Government's strategies for addressing key national priorities through the planning system. These include sustaining and developing a vibrant economy, providing quality development in the right places for the right reasons, achieving decarbonisation and climate-resilience, developing strong ecosystems, and improving the health and well-being of communities.

2.5. Future Wales – Future Wales, Policy 6 promotes a “town centre first” approach for the location of new retail and complementary uses. The reasoned justification to the policy acknowledges that “good planning can help us re-think the future of town and city centres, which are moving away from their traditional retail roles. The impact of COVID-19 on the retail sector is a further driver towards making our town centres multi-functional places.” Town centres remain important focal points of communities and are increasingly becoming places to live, centres of community and cultural activity, a focus for public services such as health and education, and the location of new co-working spaces.

2.6. The National Development Plan sets out strategic policies which development proposals must consider and will inform how decision makers determine planning decisions. The following strategic policies are considered relevant to retail proposals in Cardiff:

- **Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking**

- 2.11 “The growth and regeneration of towns and cities should positively contribute towards building sustainable places that support active and healthy lives, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure.
- 2.8. Planning authorities should use development plans to establish a vision for each town and city. This should be supported by a spatial framework that guides growth and regeneration and establishes a structure within which towns and cities can grow, evolve, diversify, and flourish over time.”

• **Policy 6 – Town Centre First**

- 2.9 “Significant new commercial, retail, education, health, leisure, and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region.
- 2.10 A sequential approach must be used to inform the identification of the best location for these developments, and they should be identified in Strategic and Local Development Plans.”
- 2.11 The ‘Town Centre First’ approach puts the health and vibrancy of town centres as the starting point of locational decision-making. It also directs facilities and services to where intended users can easily walk, cycle and/or use public transport to access them.
- 2.12 The principle of ‘Town Centre First’ is well established in planning policy in relation to retail developments. However, good planning can help us rethink the future of town and city centres, which are moving away from their traditional retail roles. The impact of COVID-19 on the retail sector is a further driver towards making our town centres multi-functional places.
- 2.13 Town centres remain important focal points of communities and are increasingly becoming places to live, centres of community and cultural activity, a focus for public services such as health and education, and the location of new co-working spaces. They are more than the extent of designated retail areas”.

**Policy 33 – National Growth Area – Cardiff, Newport, and the Valleys**

**Building Better Places - The Planning System Delivering Resilient And Brighter Futures  
(July 2020)**

- 2.14 Building Better Places was published by Welsh Government setting out their response to Placemaking and the Covid-19 recovery.
- 2.15 The Building Better Places document outlines the approach Welsh Government will seek to implement as the country recovers from the pandemic, which pinpoints the most relevant policy priorities and actions to aid in the recovery. It states “Our centres should become places where a variety of retail, employment, commercial, community, leisure, health, and public sector uses come together in a hub of

activity to make them viable as go-to destinations once more. Flexible, local co-working spaces could also be a crucial new element to increase space to work. Residential uses are also key to the vitality of centres, if they do not curtail the commercial activities which take place and soundscapes are considered.

- 2.16 Evidence suggests that traditional retailing uses will not be as prevalent and the demand for new retail space will be very low for the foreseeable future, therefore primary retail areas will need to be urgently reviewed. This must be realistic and not done in the expectation that retail occupiers will return in the numbers we witnessed prior to the pandemic. Unreasonable and inflexible policies should be challenged through the development plan process, as much more creative thinking will be needed to reimagine and re-purpose these areas.” (Building Better Places, p.18, 2020).
- 2.17 Due to the timescales surrounding the LDP process it is imperative decision makers respond flexibly to planning proposals, “the planning system must respond to this situation by ensuring that our retail and commercial centres can operate as flexibly as possible” (Building Better Places, p.18, 2020).
- 2.18 The Building Better Places document is also referenced in PPW stating “Building Better Places recognises the pivotal role that planners play in shaping our society for the future. They must plan for our priorities around placemaking, decarbonisation and well-being. Building Better Places starts to identify action to achieve this and upon which we must build; future reviews of Planning Policy Wales will enable us to further integrate this work. Everyone has a part to play to ensure that the communities of tomorrow benefit from the foresight of today” (PPW, para.2.23, 2021).

### **3 Planning Policy Wales**

- 3.1 Planning Policy Wales sets out the national priorities and considerations with regards to new commercial and retail development and for managing change within existing commercial and retail centres.
- 3.2 Paragraph 4.3.10 of Planning Policy Wales identifies that local planning authorities should establish a hierarchy of retail and commercial centres in their development plan strategy, identifying boundaries on the proposals map.
- 3.3 Using locally defined definitions, planning authorities should identify and categorise retail and commercial centres by the functions they fulfil, consider their future roles, and recognise opportunities to support Welsh Government retail and commercial centre objectives. (Paragraph 4.3.11)
- 3.4 When developing a hierarchy, account should be taken of the size, scale, form, function, and location of the retail and commercial centres within an area. The planning authority should consider the characteristics of each type of centre so they can be consistently categorised. For example, this could be the range of uses present or the extent of the catchment area. The hierarchy should distinguish

between higher order centres which have a wider range of uses and larger catchment areas, and lower order centres which are important to communities for day-to-day needs. (Paragraph 4.3.12).

- 3.5 This advice reflects earlier guidance set out in Section 4 of TAN4 (2016) that describes how a retail hierarchy should be composed. TAN4 provides further guidance on the use of a retail hierarchy at Paragraph 4.5, as follows:
- 3.6 Once the hierarchy has been established, appropriate policies may be developed for different types of retail and commercial centre. These will primarily relate to changes of use of existing buildings and how flexible a local planning authority wishes to be in dealing with such applications, in accordance with their retail strategy and how they foresee retail and commercial centres developing in the future.

## **4 Existing Adopted Policy**

- 4.1 The Adopted Cardiff Local Development Plan (2016) policies set out the aims and objectives for governing retail and other town centre uses in Cardiff's Central Shopping Area, and its District (11 no.) and Local (20 no.) Centres, within the context of PPW and TAN 4 guidance. The Plan sets out a Retail Hierarchy in Policy R1, and how policy looks to share a 'town centres first' approach by encouraging appropriate uses into existing centres, and carefully controlling new uses outside of those centres.
- 4.2 In addition, the Council has related Supplementary Planning Guidance (SPG) documents. The key SPG of relevance is the Food, Drink and Leisure Uses (2017). The SPG builds on the guidance contained in the adopted Plan and provides a detailed explanation of the factors which are important to creating successful spaces in Cardiff City Centre, and the District and Local Centres.
- 4.3 Policy R1 of the Adopted LDP describes the retail hierarchy as comprising the Central Shopping Area, District Centres and Local Centres. Policies R4 and R5 set out which centres and District Centres and Local Centres.
- 4.4 The purpose of defining a hierarchy in broad terms signals to investors where the Council is looking to provide future growth. In practice however, it is a key component of the need, sequential test, and impact tests in decision making for town centre uses. The higher up the hierarchy, a more varied range of uses are expected to be found in a centre, and the more resilient and welcoming of new development within, or close by the centre might be. Importantly, the hierarchy determines how the sequential test is applied under a 'town centre first' approach. For example, a proposal for an out-of-centre food store nearby a Local Centre would be expected to pass the test of having first examined the availability, suitability, and viability of central or edge-of-centre sites in nearby higher order centres (i.e., District Centres, or the City Centre itself).

4.5 When amalgamated the full retail hierarchy is as follows:

**Existing Retail Hierarchy**

Hierarchy	Centre/s
Central Shopping Centre	Cardiff City Centre
District Centres	Albany Road/Wellfield Road City Road Clifton Street Cowbridge Road East Crwys Road/Woodville Road Bute Street/James Street Merthyr Road, Whitchurch Penarth Road/Clare Road St. Mellons Thornhill Whitchurch Road
Local Centres	Birchgrove Bute Street (Loudoun Square) Cathedral Road Countisbury Avenue Caerau Lane Fairwater Green Gabalfa Avenue Grand Avenue High Street, Llandaff Maelfa, Llanederyn Newport Road, Rumney Rhiwbina Village Salisbury Road Splott Road Station Road, Llanishen Station Road, Llandaff North Station Road, Radyr Tudor Street Willowbrook Drive Wilson Road

The Nexus Study examined whether the above groupings, Central Shopping Area, District Centres and Local Centres remain appropriate.

4.6 Neither Planning Policy Wales nor TAN4 specifies the titles of a suggested retail hierarchy. It is for each authority in Wales to suggest its own hierarchy titles using locally defined definitions and as such the titles used in the hierarchy remain broadly appropriate. Cardiff is a predominantly urban authority, as such, there are no centres which would be described as ‘town centres,’ ‘village centres’ or ‘rural centres’ as in other local authority areas.

4.7 The study therefore concluded that each centre outside Cardiff City Centre is appropriately described as either a District Centre or Local Centre.

4.8 However, it was considered appropriate to retile the ‘Central Shopping Area’ to the ‘Central Retail and Commercial Area’ to reflect the terminology set out in Paragraph 4.3.37 of PPW and the need to define the centre more broadly and flexibly than as being purely for ‘shopping’ activities. Linked to this the study advocated small extensions to the current boundary in recognition of the diverse range of uses found within the city centre.

## 5 The Role and Purpose of Centres

5.1 Paragraph 4.311 of PPW requires planning authorities to define the role and purpose of centres at each tier of the hierarchy. The adopted Plan does not currently do this. The Study recommended a suitable definition is added to each of the three tiers of the hierarchy to assist with expectations around the future role and function of each centre, and how this differs between different tiers and following an assessment of each centre within the current hierarchy, recommend the following.

### Potential Definitions of the Role of each Tier of the Retail Hierarchy

Hierarchy	Role
Central Shopping Area (of Central Retail and Commercial Area)	Provides a broad range of shop, retail and non-retail services, business, cultural, leisure and community facilities to serve the city and a significant hinterland beyond. It is both the focus for the community and public transport networks.
District Centres	Provides (or has the potential to provide) a range of shops, retail and non-retail services, businesses and community facilities to a suburb and potentially neighbouring suburbs
Local Centres	Provides (or has the potential to provide) a small grouping of units, typically comprising a small convenience store, other small shops of a local nature, and some retail or non-retail services. Will typically service its immediate suburb.

### Assessment of Adopted LDP Retail Hierarchy

5.2 Having considered the title, role and function of the retail hierarchy, centres were assessed on whether they are appropriately placed in the retailing hierarchy using empirical evidence (survey data) to assess a range of criteria, including the number of units, comparison and convenience goods market share, average market rent and supermarket and community services provision.

5.3 This list is not intended to be exhaustive but is considered to include the key characteristics which define the hierarchy.

## Retail Hierarchy Indicators

Centre	No of Units	Market Share – Comparison Goods (Inner Study Area)	Market Share – Convenience Goods (Inner Study Area)	Market Rent	Community Services <sup>29</sup>	Large Super-markets <sup>30</sup>
Central Shopping Area	654	45.4%	4.8%	£23.02/ sq ft	LIB, LC, DS, PS, TS	1
Albany Road/ Wellfield Road	194	0.8%	1.8%	£18.83/ sq ft	LIB, DS, TS	
City Road	160	0.0%	0.5%	£18.66/ sq ft	LIB, DS, PS	
Clifton Street	95	0.0%	0.5%	£17.91/sq ft	DS	
Cowbridge Road East	176	0.4%	1.0%	£18.30/sq ft	LIB, DS	
Crwys Road/ Woodville Road	128	0.0%	0.0%	£18.30/ sq ft	LIB, LC, DS, TS	
Bute Street/ James Street	59	0.0%	0.3%	£17.39/sq ft	LIB, DS, PS, TS	
Merthyr Road, Whitchurch	89	0.0%	0.5%	£18.68/sq ft	LIB, DS	
Penarth Road/ Clare Road	67	0.0%	1.2%	£19.90/sq ft	LIB, DS, TS	
St Mellons	15	0.6%	1.1%	£16.57/ sq ft	LIB, DS	1
Thornhill	3	0.9%	4 4.4%	£16.41/sq ft	DS	1
Whitchurch Road	109	0.8%	0.8%	£18.71/sq ft	LIB, LC, DS	
Birchgrove	43	0.0%	0.4%	£17.88/sq ft	DS	
Bute Street (Loundon Square)	9	0.0%	0.0%	£17.88/sq ft	LIB, DS	
Cathedral Road	26	0.2%	0.3%	£20.31/sq ft	DS	
Countisbury Avenue	33	0.1%	0.1%	£16.41/sq ft	LIB	

<b>Caerau Lane</b>	9	0.0%	0.0%	£17.42/sq ft	LC, DS	
<b>Fairwater Green</b>	13	0.0%	0.1%	£20.07/sq ft	LIB, LC, PS, DS	
<b>Gabalfa Avenue</b>	12	0.0%	0.0%	£19.31/sq ft	LIB, DS	
<b>Grand Avenue</b>	15	0.0%	0.0%	£25.77/sq ft	LIB	
<b>High Street, Llandaff</b>	32	0.0%	0.0%	£20.06/sq ft	DS	
<b>Maelfa, Lalnderyn</b>	12	0.0%	0.0%	N/A	LIB, DS	
<b>Newport Road, Rumney</b>	46	0.1%	0.1%	£19.35/sq ft	LC, PS	
<b>Rhiwbina Village</b>	39	0.1%	0.2%	£18.99/sq ft	LIB, TS	
<b>Salisbury Road</b>	42	0.0%	0.0%	£18.85/sq ft	DS	
<b>Splott Road</b>	33	0.1%	1.3%	£19.03/sq ft	DS	
<b>Station Road, Llanishen</b>	25	0.2%	0.1%	£18.35/sq ft	LIB, LC, TS, DS	
<b>Station Rd, Llandaff North</b>	30	0.0%	0.3%	£17.24/sq ft	TS, DS	
<b>Station Road, Radyr</b>	13	0.1%	0.4%	£18.79/sq ft	TS, DS	
<b>Tudor Street</b>	35	0.0%	0.0%	£20.02/sq ft		
<b>Willowbrook Drive</b>	3	0.0%	0.0%	£20.07/sq ft	DS	
<b>Wilson Road</b>	14	0.0%	0.0%	£20.07/sq ft	DS	

Notes: 29 Community facilities key = LIB (Library), LC (Leisure Centre), DS (Doctors Surgery), PS (Police Station), TS (Train Station) – included if within 300m of centre boundary. 30 Defined as supermarkets with 1,000 sq m + net sales area.

5.4 In most cases, the assessment shows a clear distinction between the three tiers of the hierarchy. It is broadly divided into a centre with 500+ units, centres with 50-200 units, and centres with up to 50 units. There are outliers to this assessment, most notably the District Centres at St Mellons (15 units) and Thornhill (3 units).

However, each of those centres has a large supermarket which contribute significantly to their overall attraction and market share. The market share assessment also broadly supports the current hierarchy, with the majority of District Centres having convenience and comparison goods market shares more than the Local Centres. The same is true of the provision of community facilities.

- 5.5 In terms of any potential amendments to the hierarchy, there are no obvious ‘outliers’ in the above table which would suggest move away from the current hierarchy. As such the Council were recommended to proceed with the centres of the Retail Hierarchy as they are currently ordered.
- 5.6 The health checks have shown that most of the designated retail and commercial centres within the retail hierarchy continue to fulfil their role in terms of meeting the needs of local communities and no changes are proposed to the existing network. The following retail hierarchy will therefore continue to be the focus of new retail, commercial, leisure and appropriate employment development within the Replacement LDP:

## 6 Hierarchy – Recommended Classification of Centres

	Role	Centres
<b>Central Shopping Area (or ‘Central Retail and Commercial Area’)</b>	Provides a broad range of shops, retail and non-retail services, businesses, cultural, leisure and community facilities to serve the City and a significant hinterland beyond. It is both the focus for the community and public transport networks.	Central Shopping Area
<b>District Centres</b>	Provides (or has the potential to provide) a range of shops, retail and non-retail services, businesses and community facilities to a suburb and potentially neighbouring suburbs.	Albany Road/ Wellfield Road City Road Clifton Street Cowbridge Road East Crwys Road/ Woodville Road Bute Street/ James Street Merthyr Road, Whitchurch Penarth Road/ Clare Road St Mellons Thornhill Whitchurch Road

<b>Local Centres</b>	Provides (or has the potential to provide) a small grouping of units, typically comprising a small convenience store, other small shops of a local nature, and some retail or non-retail services. Will typically serve its immediate suburb.	Birchgrove Bute Street (Loundon Square) Cathedral Road Countisbury Avenue Caerau Lane Fairwater Green Gabalfa Avenue Grand Avenue High Street, Llandaff Maelfa, Llanderyn Newport Road, Rumney Rhiwbina Village Salisbury Road Splott Road Station Road, Llanishen Station Rd, Llandaff North Station Road, Radyr Tudor Street Willowbrook Drive Wilson Road
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Source: Nexus Planning

## 7 Additional Centres

7.1 Analysis of empirical household survey work found no notable market shares derived by other centres within Cardiff beyond the thirty-two centres currently contained within the hierarchy, that could be considered for inclusion within the hierarchy as either a District or Local Centre. In a rural authority it would be typical to find smaller villages which offer important provision to residents that overtime may reach a gravity of provision which would justify their inclusion in the hierarchy. Cardiff comprises a tight knit urban authority where most of the provision outside of identified centres, is out of centre; provision which is potentially harmful to the vitality and viability of existing centres.

- 7.2 Furthermore, the empirical household survey data found no significant gaps in retail provision as there was no demonstrable robust evidence of expenditure leakage elsewhere that could justify a geographic intervention.
- 7.3 For these reasons, no additional centres are included in the hierarchy.

## **8 The Spatial Extent of Centres**

- 8.1 The Retail Study undertook a quantitative capacity assessment for new retail (comparison and convenience goods) and leisure floorspace in Cardiff, covering the period for 2021-2036 and calculated needs based on the constant market shares approach, which assumes that existing shopping patterns will remain stable over the LDP period (2021 – 2036) and stores within the city continuing to draw the same percentage of spending from the study area.
- 8.2 The results of the capacity study concluded there is no capacity to support further convenience or comparison goods floorspace across the City when considered as a whole, by 2036. As such, no additional sites are needed to be included in the Replacement LDP to accommodate convenience or comparison retailing. Furthermore, the qualitative and quantitative assessment of leisure need identified no significant gaps in the provision of larger commercial leisure facilities in the City.
- 8.3 Given the negative projected capacity for future floorspace, there is no obvious pressure to expand boundaries to cater for new development.
- 8.4 As such there is a need to consider whether the current boundaries of centres are appropriate.
- 8.5 While PPW and TAN4 do not offer precise guidance for defining the spatial extent of centres, both documents make it clear that appropriate boundaries are necessary to enable developers and decision-makers to consider the sequential, impact and needs tests when considering individual proposals for development and/or change of use. It is also relevant for consideration of the impact threshold (nationally set at 2,500 sq m gross external area).
- 8.6 Edge-of-centre is defined as sites which are within a 200m or 300m walking distance of a centre boundary (TAN 4, Paragraph 7.4), whilst out-of-centre is defined as those areas beyond 300m.
- 8.7 In this context it is important to define suitable boundaries and the right balance between having a sufficiently large area to cater for the demands within a centre and defining too wide a boundary, where a few sites which not be suitable for development fall on the edge of centre.
- 8.8 PPW also notes that it may be appropriate to make changes to a retail and commercial centre boundaries where a particular centre is evidenced to be in decline, and where regeneration initiatives are thought unlikely to be successful

(Paragraph 4.3.36). 8.9 Based on health-checks of all centres, these circumstances are not considered to exist in any of the centres in Cardiff.

- 8.10 PPW refers to the importance of identifying Primary and Secondary Shopping Areas within the boundaries of major centres (Paragraphs 4.3.30 to 4.3.39). Primary areas are typically characterised by a high proportion of A1 retail use, and secondary areas typically contain mixed uses such as shops, café and restaurants and other service and community uses.
- 8.11 Local Authorities should encourage a diversity of uses within centres and link policies to these designations. In Cardiff, only the Central Shopping Area (as currently defined) has a 'Protected Shopping Frontage' designation which covers both the primary and secondary frontages. The health assessment confirms that CSA remains a vital and viable location for 'Protected Shopping Frontage' designation and the existing protected shopping frontages remains appropriate.
- 8.12 No other centre within the retail hierarchy has a volume of retail which would necessitate the inclusion of primary or secondary shopping frontages.

## **9 Direction For Retail Development and Leisure Development**

### **Convenience Floorspace**

- 9.1 The quantitative assessment of capacity found there to be no capacity to support further convenience goods floorspace across the City when considered as a whole, by 2036. It is not recommended that any sites are brought forward as part of the Local Plan to accommodate convenience retailing.

### **Comparison Floorspace**

- 9.2 The quantitative assessment of capacity found there to be no capacity to support further comparison goods floorspace across the City when considered as a whole, by 2036. It is not recommended that any sites are brought forward as part of the Local Plan to accommodate comparison retailing.

### **Leisure Development**

- 9.3 Neither the qualitative, nor quantitative assessment of leisure need identified any significant gaps in the provision of larger commercial leisure facilities in the City. Notwithstanding the capacity assessments, there is a level of dissatisfaction with the provision of facilities for children in the City as a whole, and this may be a focus for future policy. (Placemaking opportunities).

## **10. Conclusions**

- 10.1 The findings and recommendations of the Retail and Leisure Study and summarised in this Background Paper have been assessed in the context of the Adopted Local Plan and

the need for a Replacement Local Development Plan in accord with the requirements of national priorities (Future Wales) and considerations with regards to proposals for development of retail and town centre uses and for managing change within existing commercial and retail centres in accord with PPW and TAN4 and the recommendations used to inform Retail policies in the Replacement Local Development Plan.

10.2 The results of the capacity study concluded there is no capacity to support further convenience or comparison goods floorspace across the City when considered as a whole, by 2036. As such, no additional sites are needed to be included in the Replacement LDP to accommodate convenience or comparison retailing.

10.3 The Adopted LDP Retail Hierarchy has been reviewed and assessed through health checks on all centres. The Nexus Study has confirmed the adopted Retail Hierarchy remains appropriate, with a suggestion that the Central Shopping Areas is retitled to Central Retail and Commercial Area to reflect the diversity of uses within the centre and replacement of the CSA with a new, slightly wider, 'Central Retail and Commercial Area' boundary (CRCA) to allow greater flexibility and include existing units that carry town centre uses that relate well to the uses in the CSA, as restricted by natural boundaries such as major roads. All main town centre uses (namely retail and commercial uses) should be directed toward the CRCA; and any uses within that boundary would be seen as 'in-centre.' In relation to Protected Shopping Frontages – no changes are proposed as the key shopping frontages are covered by this delineation.

10.4 The adopted boundaries of most centres were found to be appropriate, and no changes proposed. Boundary changes to some centre boundaries where existing established town centre uses have been excluded or where the adopted boundary includes non-town centre uses will be included in the boundary review a full list can be found in Appendix F of the Nexus Study.

## **11. Development Management Policies Review and Recommendations For Deposit Plan**

11.1 Policy R1 (Retail Hierarchy) rework to define the retail hierarchy, including a description of the role and function of centres within the 'retail hierarchy' and embed a 'town centre first' approach within the policy using criteria that:

- a. Support proposals which promote the identified centres as the preferred locations for town centre uses, including retail, leisure, office, visitor accommodation and appropriate residential and community facilities. A particular emphasis should be placed on residential living at centres of appropriate scale. By encouraging more residential living in town centres, footfall is created for both the daytime and night-time economy. One way of creating additional residential living in town centres is to consider the demand and supply for office accommodation, which is especially pertinent in the wake of the pandemic;

b. Ensure that development proposals are in keeping with the defined role of each centre and;

c. Stipulate that the retail hierarchy is the starting point for the consideration of retail impact and the sequential test, where proposals for town centre uses outside of town centre locations is concerned.

- 11.2 **Policy R2 (Central Shopping Area)** considers development in the Central Shopping Area - consider altering this definition to 'Central Retail and Commercial Area', to reflect the fact that there exist a multitude of town centre uses within that boundary. This builds on the text contained at Paragraphs 4.3.30 to 4.3.35 of PPW11, where it discusses the importance of a wide range of uses beyond retailing creating vitality and vibrancy in centres, in both primary and secondary locations. It is also recommended extending the boundary slightly to include some adjoining leisure, entertainment, and commercial uses, which we consider should be afforded some consideration (in terms of any proposals for their loss) under this policy.
- 11.3 **Policy R3 (Protected Shopping Frontages)** explains how the Protected Shopping Frontages are to be considered. This policy remains sound, though would add that it may be useful in the emerging Plan to also ask applicants to qualify 'how' they have actively marketed sites under criterion ii. The relevance of this is that it is often important in to understand whether the marketing effort has focussed simply on local means of advertising (e.g., agency windows/trade papers), or whether it has been subject to a national marketing campaign across a wide range of media, including digital platforms.
- 11.4 Policy R4 (District Centres) considers appropriate policy for District Centres. This policy remains broadly sound, though would suggest the Council considers whether the clause to resist continuous stretches of 3 or more units in 'non-shopping uses' should be amended to 'non-retail, leisure or community centre uses' in order to allow for a degree of more flexibility in line with post-pandemic trends (this could be defined as Use Classes A1/A2/A3/D1/D2 in line with the Use Classes Order 1987(as amended)). A specific clause could be added about resisting runs of 3 or more residential units if this is a particular concern. The approach to marketing should be as in Policy R3.
- 11.5 **Policy R5 (Local Centres)** looks at appropriate policy for Local Centres and remains relevant as previously drafted.
- 11.6 **Policy R6 (Retail Development (Out of Centre))** remains relevant. This policy governs application of the needs, sequential and impact tests, as defined in PPW and TAN4. An expansion of the text currently provided under Paragraph 5.286 to add greater specificity to the sequential test, and the requirement (as enshrined in case law) to satisfy the tests of 'availability' and 'suitability' when considering the appropriateness of sites (see also Section 7 of TAN 4) is recommended. In addition, it would be helpful to cross-reference the requirements of Paragraph 6.3 of TAN 4,

or whichever is the prevailing guidance at the time of publication, when it comes to how to prepare a quantitative needs assessment. This will help to assure uniformity of approach.

- 11.7 There is no reference to the 2,500 sq m (gross) threshold for requiring retail impact assessment (Paragraph 4.3.26 of PPW11, 2021). This should be stipulated in the new policy. Importantly, PPW also makes it clear that local planning authorities can request retail impact assessment on smaller sites/units, where they consider there may be a significant impact on existing centres (Paragraph 4.3.27), and so this too should be discussed.
- 11.8 Consider adopting a policy which seeks to ensure that the sub-division of large out-of-centre retail and leisure floorspace is subject to impact assessment. It would be a concern if out-of-centre locations sought to provide a scale of footprint which mirrors one of the current niches of a town centre, i.e., small footprint units suitable for start-up, high-end or service uses. As the economic pressures, begin to effect even out-of-town retail parks, such proposals are becoming more commonplace across the UK.
- 11.9 **R7 (Retail Provision within Strategic Sites)** Adopted Policy R7 (Retail Provision within Strategic Sites) inter-relates to Policy R6, and the wording of the existing policy remains appropriate for considering retail development being provided within strategic sites. In the pre-planning of such sites, it is vital that regard is had to the needs and impact tests, both of which are properly referred to in the existing text, to ensure that the scale of retail provision is commensurate to the scale housing development being brought forward, as well as the potential impacts beyond its borders.