

WYG Advice Note February 2016 to Inspector's Comments and Retail Representations



Following the progression of the Examination in Public of the Sefton Local Plan WYG have provided further consideration to retail policy matters within the Plan. The below note responds to comments provided by the Inspector and relevant third party representations and outlines WYG's recommendations, including any modifications to the plan where relevant. The below comments should be read in conjunction with the relevant town and district centre maps provided.

Southport Town Centre

Response to the Inspector's comments and those of Burnett Planning (on behalf of Aviva) and the Pegasus Group (on behalf of Asda):

WYG have reviewed the emerging Southport Development Strategy (December 2015) and provided further consideration to the Town Centre Boundary and Primary Shopping Area (PSA) put forward within the Local Plan. We should note that the Southport Development Strategy was not available to WYG or the spatial planning team at the time of the drafting of the Retail Strategy Review (RSR) and therefore we trust that this reconsideration ensures that the strategies are now better aligned.

The following modifications to the town centre boundary are advised:

- An extension of the boundary to the north west to incorporate properties on the southern side of Promenade between Coronation Walk and Seabank Road;
- The inclusion of leisure uses at the Waterside Development on the northern side of Promenade including the Ramada Hotel and the Southport Theatre and Convention Centre;
- An extension of the boundary to the east between Hill Street and Manchester Road;
- An extension of the boundary to incorporate further units on the southern side of King Street to the east of the Market Hall; and
- An extension of the boundary to include the Central 12 shopping park and units along the eastern side of London Road.

The following modifications to the Primary Shopping Area are advised:

- An extension to fully incorporate the Kingsway Car Park site identified within the emerging Southport Development Strategy. This site has potential for future retail or other commercial uses to expand into, although this is in the context of limited capacity for such space in the short term;
- An extension around the junction of King Street and Market Street to include additional retail frontages on both of these streets including the Market Hall;
- The extension of the PSA south along Eastbank Street to include frontages on both sides of the street up to the junction with Bridge Street and Riding Street; and
- To extend the PSA to cover the Tulketh Street site as identified in the emerging Development Strategy to encourage the utilisation of this area for commercial retail uses.

Furthermore, primary and secondary frontages have been identified.

Central 12

Following further deliberation and consideration of the information available, WYG have formed the view that Central 12 can appropriately be identified as forming part of the wider defined town centre for Southport. WYG would stress that the decision to include Central 12 as part of Southport town centre is finely balanced, with evidence and arguments both for and against the inclusion of this destination within the town centre boundary.

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It has been demonstrated through surveys commissioned by WYG and Burnett Planning (on behalf of Aviva) that linked trips are undertaken between Central 12 and other facilities within Southport town centre. The response to Q.8 of the C12 in-street shopper survey provided by Burnett Planning indicates that 44.5% of visitors to the retail park intend to link their trip with other facilities within Southport town centre. Furthermore, responses to Q.11 of the same survey identify that 46.2% of visitors indicated that they would typically visit other parts of the town centre when visiting Central 12.¹ Whilst this provides a clear indicator that the majority of visitors to Central 12 do not link their trip with accessing shops and services elsewhere in Southport town centre, this is evidence there being a connection between the shopping park and the shops and services elsewhere in Southport town centre.

Q.6 of in-street survey results finds that the majority of shoppers visiting Central 12 (54.5%) did so to purchase food from the Asda store. Given the perishable nature of a typical food goods shop, such shopping patterns do not align with extended periods of time undertaking non-food shopping or leisure activities after completing a food shopping trip. This ability to undertake a linked trip is also limited by the time restriction of the car park at Central 12 which is restricted to a maximum stay of 3 hours.

WYG's commissioned household survey which informed the Sefton Retail Strategy Review 2015, was commissioned specifically to identify strategic shopping patterns across the Borough, different to the Burnett Planning data which was very specific to the consideration of linked trips, and therefore needs to be considered in that context. The RSR data identified that only 7.7% of respondents who completed their last main food shop at the Asda Central 12 store linked their trip with a visit to access shops and services within Southport town centre.

These survey results point to the inherent limiting factors for Central 12 to function as part of the town centre, but do nevertheless help to identify that the shopping park does provide an offer and draw that retains a connection with the town centre at large.

The recent RSR undertaken by WYG has identified that Central 12 attracts a significant proportion of the shopping expenditure for Southport town centre, estimated to be £32m at 2015. It is accepted that the facility provides an important role in meeting the shopping needs of the population within the local authority area and as such has a role in complementing the retail provision in place within the core shopping area of the town. In this respect and as a reflection of Central 12's proximity to the main shopping streets within Southport it would not be expected that retailers would wish to be represented in both the traditional shopping core of Southport (Chapel Street / Lord Street) as well as at Central 12.

The original planning permission for Central 12 provided consent of 12 separate units, each benefiting from A1 consent, with the only restrictions on the goods which can be sold relating to food goods, which were restricted to Unit 1 only. The shopping park now accommodates 14 separate units, each of which provide for main town centre uses. The NPPF's Annex 2 definition identifies town centres as 'areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area'. Central 12 plainly satisfies the first part of this definition in providing a concentration of entirely main town centre uses. To correspond with this definition in completeness it would need to be accepted that Central 12 is within or adjacent to the PSA.

London Road provides the most direct route between Central 12 and the PSA. Central 12 however is unquestionably separated from the main shopping activity within Southport (and the proposed PSA) and this is heightened by the lack of a contiguous frontage on London Road. London Road has active frontages on only one side (the northern side), with the active uses in place repeatedly interrupted by non main town centre uses and junctions with residential side streets. WYG estimate the distance from the closest point of the PSA to the frontage at Central 12 to be 420m. Given this separation, WYG would not ordinarily consider

¹ Q.11 responses indicating sometimes/rarely/never as to how often they visit other parts of Southport town centre when visiting Central 12 totaled 53.9%. Responses indicating everytime/most times totaled 46.2%

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such a location to represent an 'in centre' or PSA location consistent with the NPPF definition of town centres. However, the potential for linked trips between Central 12 has been established, be this on foot or otherwise, as has the role of the shopping park in providing a shopping offer which is complementary to and separate from that elsewhere within Southport town centre.

It is further noted that historically Central 12 has formed part of the town centre, identified in Sefton's adopted Unitary Development Plan as within Southport town centre. It is recognised that the omission of this location from the town centre would represent a departure from the existing position. With the shopping park a well established retail destination it is considered that a robust argument would need to be found to justify its omission from the town centre.

On the balance of the evidence available, it is therefore WYG's considered view that Central 12 complements and supports trips within Southport town centre to an extent that warrants the shopping parks inclusion within the wider town centre boundary. As a destination that is well connected to the wider offering provided elsewhere in Southport town centre, it is accepted that this relationship should be recognised in planning policy.

Notwithstanding this fact, it is important to clarify the advised policy position of Central 12 in being located within the wider town centre boundary. Annex 2 of the NPPF makes it clear that, for retail purposes, the PSA is the important boundary. Accordingly, should Central 12 be identified within the town centre boundary for Southport, it would still be considered to be an 'out of centre' location with regard to the sequential test due to its distance from the PSA. Inclusion within the wider town centre boundary would however recognise the shopping park as an accessible location that is well connected to a defined centre, with such locations provided sequential preference in the draft Policy ED2.

Importantly, Policy ED2 as drafted allows for appropriate development of retail, leisure and other town centre uses in locations outside of defined centres where such proposals comply with the key town centre policy tests.

Town Centre Boundary Amendments

With the exception of the inclusion of Central 12 and further parts of London Road within the town centre boundary which is addressed above, further amendments are summarised below.

The emerging Development Strategy for Southport identifies seven key development sites which are envisaged to contribute to the development and regeneration of Southport. Revisions to the town centre boundary have been made to incorporate these sites to help support their potential for development and in doing so plan positively for the development needs of the town in accordance with paragraph 23, bullet point six of the NPPF. The only identified development site opportunity not incorporated within the revised town centre boundary is the Fairways Park and Ride site. Given this site's significant distance from the core area of shops and services in Southport it is not thought appropriate to include this site.

Buildings on Promenade and at the Waterfront Development have been included within the wider town centre boundary. Whilst the area broadly between Lord Street and Promenade does not accommodate significant retail uses it is accepted that this area provides for a wide range of leisure uses which are important to the town centre's unique tourism offer and economy. To promote the continuation of a diversity of uses across this extended area and to more completely capture the extent of main town centre uses (as defined in Annex 2 of the NPPF), which function as part of Southport town centre the inclusion of this area is considered appropriate.

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Whilst the inclusion of this area brings into the town centre areas of a more residential character, specifically between Nevill Street and Seabank Road, it is not considered that the form and character of these streets would lend themselves to facilitate an undesirable dispersal of Southport's retail offer which would compromise the strength of the PSA, but would help to support a variety of uses in the more peripheral parts of the town centre, supporting viability and vitality.

A further extension of the town centre boundary is advised to the east between Lord Street and Houghton Street. This area provides for a variety of uses including retail, leisure, financial and professional services and office accommodation. The character of this area and concentration of main town centre uses is considered to justify the inclusion of this area. This boundary extension also facilitates the inclusion of the former Grand Casino site which is identified for regeneration within the emerging Development Strategy.

Primary Shopping Area (PSA) and Primary and Secondary Frontages

WYG have sought to identify appropriate primary and secondary frontages for the centre defining where retail uses are concentrated in accordance with the NPPF definition. This is based on WYG's working methodology that primary frontages are typically characterised as having +70% units being within retail use (A1) and secondary frontages having between 50% and 70% of units being within retail use (A1). Amendments to the previously put forward PSA have also been made to appropriately align with the primary and secondary frontages identified.

WYG would recommend amendments to the PSA in four areas. Firstly an extension along Eastbank Street and Wesley Street is identified to capture the extent of primary and secondary frontages evidenced by WYG's land use survey of May 2015. Secondly, on reflection of the important role the Market Hall and Market Street plays in contributing to the retail offer of the centre, highlighted in the emerging Development Strategy, an extension has been identified to include this locality. Thirdly, to positively promote the regeneration aspiration for the B&M Bargains and Kingsway Car Park sites identified in the emerging Development Strategy the entirety of these site have been incorporated within the PSA. Fourthly, the Tulketh Street development site has been incorporated, again to plan positively for the retail led regeneration aspirations for this site.

Policy Considerations

It is advised that the Council give further consideration to Policies ED7 and ED8 with respect to amendments advised to the town centre boundary for Southport.

The extended wider town centre boundary proposed more closely aligns with that of the allocation for Policy ED7 'Southport Central Area'. The Council may wish to consider revisions to this policy to enable alignment with the revised town centre boundary now put forward. This approach however would mean that some areas presently covered by Policy ED7 would no longer be addressed in policy terms, namely Southport College and the neighbouring streets which are primarily residential in character.

It is not considered appropriate to extend the town centre boundary to align with the Southport Central Area as presently defined. This is principally on account of the Southport College campus and neighbouring streets to the west, (Mornington Road, Wright Street, Scarisbrook Street, Vulcan Street, Hawesside Street and Derby Road) not containing a concentration of uses compatible with a town centre location.

The Waterside Development on Promenade is presently allocated by Policy ED8 within the 'Southport Seafront Area'. The inclusion of this development and the adjacent sites within the town centre boundary would provide an overlap of Policies ED2 and ED8 in this area which would require further consideration.

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Bootle Town Centre

Response to the Inspector's comments:

Following receipt of comments from the Inspector and further review of the Draft Bootle Town Centre Investment Strategy (December 2015) WYG recommend a number of modifications to the previously identified Primary Shopping Area and Town Centre Boundary for Bootle.

The following modifications to the town centre boundary are advised:

- An extension of the boundary to include the Asda and Aldi supermarket stores to the west and north west of the Strand Shopping Centre respectively;
- An extension of the boundary to the north to include buildings between Marsh Lane and Vermont Way, incorporating a number of buildings in office use and commercial units as well as Bootle Police Station and the Strand Medical Centre;
- An extension of the boundary to include commercial units, office premises and a social club off Stand Road to the east;
- A widening of the boundary to the south along Stanley Road to include further main town centre uses. This amendment incorporates retail and leisure units on the western side of Stanley Road and Bootle Library, the Job Centre Plus building and office premises on the eastern side of the street;
- Inclusion of the Retail Quarter site identified in the emerging Bootle Town Centre Investment Strategy (December 2015). This site is located immediately south of the Strand Shopping Centre incorporating land on either side of the Leeds Liverpool Canal.

The following modifications to the Primary Shopping Area (PSA) are advised:

- An extension of the PSA to the south to include the Retail Quarter site identified within the emerging Investment Strategy and units on the western side of Stanley Road;
- An extension of the PSA to the north to include further units which provide a retail frontage on the eastern side of Stanley Road, including the Lidl supermarket.

Furthermore, primary and secondary frontages have been identified.

The modifications proposed in establishing a more extensive town centre boundary allows for further existing main town centre uses, as defined in the Annex 2 of the NPPF to be identified as part of the centre. The amendments to the boundary have been made with consideration to the NPPF's definition for town centres and main town centre uses.

The approach taken has been to allow for the town centre boundary to incorporate the full extent of the locality where main town centre uses predominate, but to ensure that the boundary coverage relates appropriately to the PSA, which is centred on the retail offer provided at the Strand Shopping Centre. The boundary has also been drawn with respect to WYG's understanding of how the town centre functions in practice and the geographical extent of which main town centre uses in Bootle contribute to driving footfall and trips into the town centre. We note that users of the new Asda store are undertaking trips to the PSA which is approximately 300 metres from the Strand, with pedestrians either walking along Strand Road or the pedestrian underpass before crossing Washington Parade.

The PSA as identified has been drawn to encapsulate the identified primary and secondary frontage within the town centre as well as the site identified within the emerging Investment Strategy which is envisaged to accommodate a new retail quarter in order to positively plan for the centre's development needs.

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WYG's advised primary and secondary frontages seek to define where retail uses are concentrated. This is based on WYG's working methodology that primary frontages are typically characterised as having +70% units being within retail (A1) use and secondary frontages having between 50% and 70% of units being within retail (A1) use.

It is advised that the Council give further consideration to Policy ED4 with respect to amendments advised to the town centre boundary for Bootle. The amendments advised allow for the centre boundary to more closely correlate with the northern half of the 'Bootle Central Area' allocation set out in Policy ED4. It may be appropriate for the 'Bootle Central Area' to be revised to reflect a smaller extent, limited to the commercial area south of the defined town centre and thus not providing overlapping allocations.

WYG would not consider it appropriate to extend the town centre boundary to align with the full extent of the 'Bootle Central Area' as set out in Policy ED4. These two policy designations have been identified for distinctly different purposes and as a result are not entirely compatible.

The commercial area south of the main shopping core whilst containing main town centre uses, principally in the form of office accommodation, is of a distinctly different character. To incorporate this wider area within the town centre boundary would risk any new retail and leisure offer locating in this area which could consequently result in an undesirably dispersed town centre offer. Importantly, the emerging Investment Strategy envisages a more diverse range of uses within the 'Bootle Central Area', but not specifically for a greater concentration of retail uses and other main town centre uses. With demand for office space anticipated to reduce over the plan period, an increased role for residential uses is foreseen in this area.

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District Centres

Following the amendments made to the town centre boundaries and Primary Shopping Areas for Southport and Bootle, as well as the identification of primary and secondary frontages, WYG have reviewed our previously advised district centre boundaries to ensure a consistent approach has been taken across the hierarchy of centres within the Local Plan.

For each of the four district centres, WYG have identified primary and secondary frontages where appropriate in accordance with the definition set out in Annex 2 of the NPPF. Primary and secondary frontages have been identified based on WYG's working methodology that primary frontages are typically characterised as having +70% units being within retail (A1) use and secondary frontages having between 50% and 70% of units being within retail (A1) use. Consideration has also been provided to how each centre functions in practice and the extent of its retail offer.

The district centre boundaries and identified primary and secondary frontages have been defined with reference to the composition of each centre as identified by the recent diversity of uses surveys completed as part of the Sefton Retail Strategy Review and the 'town centre' definition provided in Annex 2 of the NPPF. Accordingly, the centre boundaries and frontages proposed are considered to be up to date and in accordance with the NPPF.

Crosby District Centre:

Response to the Inspector's comments and those of The Crosby Investment Steering Group:

WYG have reviewed the Crosby Development Strategy (May 2015) and provided further consideration to the district centre boundary and Primary Shopping Area put forward within the Local Plan.

It is noted that each of the three 'Key Sites' identified within the Development Strategy are located within the PSA previously identified in the RSR. Consequently these sites, which are considered as important to securing future investment and development within the district centre, are suitably planned for in a positive manner. Similarly, the three Council owned car parks which the Development Strategy indicates the Council may be willing to release to realise the objectives of the Investment Strategy are also entirely within the PSA outlined in the RSR. With account taken of these strategically important sites the PSA as proposed is entirely compatible with the Development Strategy in planning positively to allow for the future development needs of Crosby.

The following modifications to the district centre boundary are advised:

- An extension of the boundary to incorporate an additional five commercial units on the northern side of Coronation Road;
- An extension of the boundary to incorporate the Church Hall building and Crossroads Café on the southern side of the By-Pass.
- An extension of the boundary to incorporate four additional commercial units on Liverpool Road and 'The Crosby' public house.

With consideration given to comments provided by the Inspector WYG would recommend minor modifications to the Crosby district centre boundary from that previously put forward in order to more accurately reflect the extent of main town centre uses which operate as part of the centre in accordance with the NPPF and to positively plan to support Crosby's viability and vitality.

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The inclusion of further units on Coronation Road is considered to better reflect the true extent of main town centre uses in place within the centre, with a contiguous active frontage existing on the northern side of the street to justify this modification.

The Crossroads Café represents a main town centre use adjacent to the PSA and therefore warrants inclusion within the wider town centre boundary. The Church Hall, although not a main town centre use as set out within the definition provided in Annex 2 of the NPPF represents a location for assembly and for activities that can drive footfall in the area. Combined with this facility's location, adjacent to the PSA, means that the building has a function as part of the wider centre. The St Luke's Church building is not included within the proposed district centre boundary as religious institutions are not considered to be a main town centre use. Additionally, this historic building is unlikely to be promoted or considered appropriate to accommodate main town centre uses during the plan period and consequently its inclusion within the district centre boundary is thought to be unnecessary.

On Liverpool Road the extension of the district centre boundary is proposed to include one unit on the western side of the street and a terrace of three units on the eastern side of the street, as well as a public house. These properties are included on acceptance that the active frontage provided along Liverpool Road out from the core of the centre can appropriately be considered to extend to include these properties which provide main town centre uses.

We note the representations made by The Crosby Investment Steering Group that the boundary should be extended still further to incorporate properties on Endbutt Lane and further frontages on Liverpool Road. However, there is a danger with a wider boundary that development becomes more dispersed and the centre suffers as a result. These properties are considered to more appropriately function as separate local parade rather than an extension of the defined centre and are sufficiently detached from the PSA to justify their omission. A continuous active frontage along London Road is not in place to warrant the inclusion of these units as part of the defined centre. Notwithstanding this approach, the boundaries and Policy ED2 as drafted still allows for appropriate development in locations outside of the centre where such proposals comply with the key town centre policy tests. We should also add that the level of vacancies in the district centre, which are focused on the pedestrianised section of Liverpool Road, has partly been managed due to the previous aspirations to provide an enlarged Sainsbury's store and redevelopment, where units were purposely not made available to ensure delivery. However, with such expansion plans now abandoned it is considered likely that these units will be again made available. Therefore it is in this context that WYG are nervous to extend the boundaries significantly beyond the modifications suggested as this could allow potential tenants not to locate in a more central location such as Liverpool Road and therefore we advise that this is a more sustainable and logical strategy to encourage the re-use of current vacant space.

The minor modifications proposed have been made with consideration to planning positively to support potential investment in Crosby district centre, with a considerable part of investment activity over recent years in Crosby known to have occurred outside of the pedestrianised area and within the frontages on the surrounding arterial streets, partly due to the land ownership issues identified above. However, an approach should be taken to seek to focus new development into a suitably focused centre boundary to help ensure that vacant units are reoccupied and that the vitality of the centre is not compromised.

To ensure consistency with the approach taken for the two town centres, shopping frontages have been considered for Crosby district centre. Primary frontages have been identified to comprise the units which together form the pedestrianised shopping area along Liverpool Road. It is in this location where retail uses are found to be most concentrated and provides the focus for the centre's retail offer.

Secondary frontages for Crosby have not been defined as such frontages are not considered appropriate or necessary in effectively planning for future development in the centre.

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The more peripheral parts of the centre outside of the pedestrianised area do not provide a concentration of retail uses consistent with WYG's approach taken for defining primary or secondary frontages. These areas instead provide a more diverse mix of retail, service and leisure uses. To allow a greater level of flexibility and to encourage the ability of the more outlying parts of the centre to provide for a diversity of main town centre uses it is not thought appropriate to define these locations as secondary frontages.

The PSA has been defined to reflect the extent of the identified frontages and the area where retail uses are concentrated. The PSA remains unchanged from that previously advised within the RSR.

Waterloo District Centre:

Following further review, amendments to the Waterloo district centre boundary are advised. It is considered that the boundary should be extended to allow for the inclusion of buildings on both sides of Crosby Road North in order to more accurately incorporate a greater extent of main town centre uses which operate as part of the centre in accordance with the definition of town centres within the NPPF. Previously the district centre boundary was divided into two areas. The advised amendment would create a single district centre boundary, connecting the two previously identified areas. The buildings advised to be included provide main town centre uses and incorporate civic, office, leisure and service uses.

This area in being adjacent to the PSA is appropriately located to allow for inclusion within the wider town centre boundary with the uses in place considered to complement the shopping offer. The revised town centre boundary advised overlaps with the mixed use area allocation ('Land at Crosby Road North') set out in Policy ED4. **It is therefore advised that the Council give further consideration to Policy ED4 with respect to amendments advised to the town centre boundary for Waterloo.**

Primary and secondary frontages have been identified for the centre. These frontages are limited to South Road, St John's Road and units on the western side of Crosby Road North where retail uses are concentrated. The PSA has subsequently been amended to reflect the extent of primary and secondary frontages identified through being extended along South Road, St John's Road and Crosby Road North to achieve this.

The identified frontages do not extend to incorporate the entirety of the commercial properties on South Road or St John's Road. This is based on parts of these streets providing for a greater diversity of uses with less of a focus on retail and a higher proportion of leisure and service businesses. To continue to allow for a diversity of main town centre uses it is considered appropriate to not identify these areas as primary or secondary frontages, consistent with the NPPF definition.

Formby District Centre:

Following a review of the previously advised district centre boundary, no amendments to this boundary are advised.

Primary and secondary frontages have been identified based on WYG's recent diversity of uses survey which reflect the extent and concentration of retail uses in place on Chapel Lane, Halsall Lane, Three Tuns Lane and Furness Avenue. Subsequent minor modifications to the PSA are advised to reflect the extent of primary and secondary frontages identified. The advised PSA boundary has been extended in two areas, these being to include a terrace of units on the northern side of Furness Avenue and units on the eastern side of Three Tuns Lane which face the car park of the Waitrose store. These two grouping of commercial units are each defined as representing secondary frontages and as such warrant inclusion within the PSA.

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Maghull District Centre:

Following a review of the previously advised district centre boundary, no amendments to this boundary are advised.

Primary frontages have been identified for the Central Square Shopping Centre and the Red Lion Centre, include the Morrisons store. These locations accommodate the majority of the centre's retail uses and are considered to represent the most appropriate locations to focus new retail development.

At the time of WYG latest diversity of use survey the identified frontage at Central Square which faces directly on to Westway in the north east corner of the centre did not provide a concentration of +50% A1 uses consistent with WYG's approach to defining frontages. However, a number of the units within this terrace were found to be vacant. If tenants can be found to occupy these vacant units there is potential for the retail offer in this location to be improved. With consideration to the potential fluidity of the current situation and the location of this frontage, adjacent to the other terraces of units at Central Square and good car parking opportunities, it is considered appropriate to identify these units as primary frontage going forward.

The more peripheral parts of the centre away from Central Square and the Red Lion Centre do not provide a concentration of retail uses consistent with WYG's approach taken for defining primary or secondary frontages and are more detached from the focus of retail uses on Westway. These areas instead predominantly provide a more diverse mix of retail, service and leisure uses. To allow a greater level of flexibility and to encourage the ability of the more outlying parts of the centre to provide for a diversity of main town centre uses it is not thought appropriate to define these locations as secondary frontages.

The PSA has been defined to reflect the extent of the identified frontages and the area where retail uses are concentrated. The PSA remains unchanged from that previously advised with the RSR.

In light of the advised changes to the defined centres summarised above, modifications have been proposed to to .

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Policy ED2

Following the identification of primary and secondary frontages for the defined town and district centres within the emerging Local Plan, consideration needs to be provided as to how these frontages are considered in policy terms. WYG consider that the adoption of a PSA alongside identified primary and secondary frontages provides an important tool to guard against inappropriate concentrations of non retail and service uses within PSAs which in turn can help to support the vitality of town centres.

An advised draft amendment has been made to part 4 of draft Policy ED2 to support the identified primary and secondary frontages. The policy wording broadly seeks to provide protection to A1 uses within the primary frontages and to protect active ground floor uses in both the primary and secondary frontages.

A variety of approaches can be taken to provide protection through planning policy to primary and secondary frontages. It will be important to adopt an approach that is both relevant and appropriate to Sefton's town and district centres based on local circumstances and future aspirations. Further dialogue will be needed with the Local Planning authority to establish the intended aspirations for planning policy in relation to primary and secondary frontages.

The wording provided at part 4 of draft Policy ED2 provides an initial basis for consideration to address primary and secondary frontages. If a threshold figure for A1 uses within the identified frontages is included within this policy, it will be important to specifically identify the area of frontage for which this threshold will be calculated against. This would likely require the addition of a list of frontages similar to that provided at figure 7.2 in the Submission Draft Local Plan.

Consideration will also be required as to if a differing policy approach is necessary for the individual town and district centres respectively.

It is noted that the extension of permitted development rights provided by the Town and Country Planning (General Permitted Development) (England) Order 2015 and any future changes to permitted development rights may impact on the effectiveness of this policy in practice.