Contents

Sequential and Impact Assessment Advice ................................................................. 1

Prepared By: Helen Mansley (Planner)/Adam Bunn (Principal Planner)/Caroline Marginson (Director)
Status: Final Report
Draft Date: July 2015

For and on behalf of GVA Grimley Ltd
Sequential and Impact Assessment Advice

Introduction

The National Planning Policy Framework was published in March 2012 and provides the government’s planning policies for England. Paragraphs 24 and 26 of the National Planning Policy Framework set out the ‘sequential’ and ‘impact’ tests required when assessing planning applications for main town centre uses/retail and leisure development outside of town centres. Below, we outline the specific requirements of these two key tests; provide advice on the application of the sequential test; and consider whether it is necessary for Doncaster Metropolitan Borough Council (“the council”) to set a local retail floorspace threshold within Doncaster for the assessment of impacts, and if so, what the threshold should be.

Our work draws on the findings of the Doncaster Retail, Leisure and Town Centres Study, which was completed by Bilfinger GVA on behalf of the council in July 2015, and should be read in conjunction with this study. We follow the advice set out in the Planning Practice Guidance, which was launched by the Department for Communities and Local Government in March 2014. The web-based Planning Practice Guidance provides technical guidance on how to prepare a robust evidence base and the application of the sequential and impact tests.

Sequential Test Requirements

Paragraph 24 of the National Planning Policy Framework requires that local planning authorities apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date local plan. The sequential test guides main town centre uses towards in centre locations first; then, if no in-centre locations are available, to edge-of-centre locations, and, if neither in-centre locations nor edge-of-centre locations are available, to out-of-centre locations, with preference for accessible sites which are well connected to the town centre.

The sequential test supports the vitality and viability of town centres by placing existing town centres foremost in both plan-making and decision-taking. In plan-making, the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected. In decision-taking, applicants are required to demonstrate compliance with the sequential test.

The sequential location of a site – specifically whether it is in, edge or out of centre – provides the foundation of the sequential approach set out in the National Planning Policy Framework.
The National Planning Policy Framework defines the sequential location of a site on the basis of the defined primary shopping area and town centre boundaries; the definition of these boundaries in Doncaster therefore have implications in relation to the sequential approach and the requirement for and application of the sequential test.

For retail uses, locations within the primary shopping area are classed as being within the centre in the context of the sequential approach. For all other main town centre uses, locations within the town centre boundary are defined as in centre. All locations within Doncaster’s primary shopping area are therefore classed as in centre, and all locations within the town centre boundary are in centre for all main town centre uses excluding retail.

For retail uses, edge-of-centre is defined as a location that is well connected to and up to 300 metres from the primary shopping area. In determining whether a site falls within the definition of edge-of-centre, the National Planning Policy Framework states that account should be taken of local circumstances. Roughly speaking, a 300 metre area from the primary shopping area boundary in Doncaster provides an indication of the broad ‘edge-of-centre area’ of Doncaster for retail purposes. This ‘edge-of-centre area’ extends to: the railway line to the west of the primary shopping area; the river Don to the north west and north; Boxholme Lane to the north east; the town centre boundary to the east and south east; and St James’s bridge to south. We emphasise, however, that whether a site is edge or out-of-centre in sequential terms is dependent on the specific location of a site and its relationship with the primary shopping area and is not strictly defined by distance from the primary shopping area.

For all other main town centre uses, edge-of-centre is defined as locations within 300 metres of the town centre boundary. For office development, this includes only those locations within 500 metres of a public transport interchange.

**Local Floorspace Threshold for the National Planning Policy Framework Impact Assessment**

Paragraph 26 of the National Planning Policy Framework confirms that 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 floorspace threshold, the ‘default’ threshold of 2,500 square metres applies. Currently, neither the Doncaster Core Strategy nor the saved Unitary Development Plan policies identify a local floorspace threshold for the assessment of impacts. In setting a locally appropriate threshold, the Planning Practice Guidance advises that:
‘...it will be important to consider the: scale of proposals relative to town centres, the existing vitality and viability of town centres, cumulative effects of recent developments, whether local town centres are vulnerable, likely effects of development on any town centre strategy, [and] impact on other planned investment.’

For applications on the edge of Doncaster town centre (for retail uses, edge-of-centre is defined as a location that is well connected to and up to 300 metres from the primary shopping area, and for leisure uses, edge-of-centre is defined as locations within 300 metres of the town centre boundary), we recommend that the council should adopt a local floorspace threshold in its local plan of **750 square metres gross**, which would apply to any planning applications for retail or leisure development (including extensions) where the amount of floorspace proposed is above the stated threshold.

Whilst Doncaster is a sub-regional shopping destination, and its prime retail area focused on the Frenchgate Centre is showing strong signs of vitality and viability against the indicators set out in the Planning Practice Guidance, the vitality and viability of many secondary areas within the town centre is of concern. Convenience provision in the centre is also relatively limited and the town centre has recently lost an important main foodstore anchor. In these circumstances, we consider that relatively modest trade diversion from Doncaster town centre could have a ‘significant adverse’ impact, as recognised in the Planning Practice Guidance which advises that:

‘A judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. For example in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.’

Moreover, retail provision in the centre has contracted substantially in recent years, which is attributable to wider changes in the retail sector but also the development of extensive out of centre retail development in Doncaster. We identified in Section 6 that spending in the five main out of centre comparison retail destinations in Doncaster now amounts to nearly a quarter of that spent in Doncaster town centre.

In most cases the impacts of the growth in out-of-centre retailing in Doncaster have been gradual and it is the cumulative effects of developments over time, compounding wider trends, that have resulted in a decline in vitality and viability of Doncaster town centre.

Major new leisure and retail development is also planned for Doncaster town centre within the Waterdale shopping centre and the Civic and Cultural Quarter as part of the council’s strategy to enhance the vitality and viability of the Doncaster town centre. As set out above, the introduction of a more diverse commercial leisure offer into Doncaster town centre is
considered fundamental to its long term vitality and viability, to enable to move away from solely being a retail centre to one which caters for a broader range of uses, and functions as a diverse centre both during the daytime and night-time. On this basis, proposals for development of commercial leisure uses outside of Doncaster town centre comparable to those which the council wishes to come forward in the Civic and Cultural Quarter should, in principle, be strongly resisted, as they are likely to represent a ‘significant adverse’ impact against planned investment/investor confidence in the centre.

So, therefore, we consider it essential that tightly-defined development management policies are put in place to ensure the protection of the future vitality and viability of Doncaster town centre from further out-of-centre retail and commercial leisure development.

In respect of planning applications, it will be important to assess whether any trade would be drawn from Mexborough and Thorne town centres, or any of the borough’s district or local centres. Mexborough and Thorne town centres, along with the other smaller centres in the borough, operate with much lower turnovers than Doncaster town centre, and consequently any impact of new floorspace would be proportionately higher in terms of trade diversion. For applications within the borough outside of Doncaster town centre, an impact threshold of 500 square metres gross of retail floorspace is recommended. This would apply to any planning applications for retail or leisure development (including extensions) that are not in or on the edge of Doncaster town centre and where the amount of floorspace proposed is above the stated threshold.

The recommended impact assessment thresholds should also apply to any planned new centres or the expansion of existing centres over the course of the local plan period to ensure that such development will not result in a significant adverse impact on existing centres.