

LDP2 **Ceredigion**

**Replacement Local Development Plan
2018 - 2033**

Topic Paper: Retail

Update for Preferred Strategy 2019

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Cyngor Sir
CEREDIGION
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Note for Reader

Topic Papers are background papers which provide evidence for choices and decisions made as part of preparation of the Local Development Plan.

The update Topic Papers for the Local Development Plan (LDP) Deposit were published at the same time (December 2010) and are still available on the Council website or in paper copy by request.

The Ceredigion LDP was adopted in April 2013. The local planning authority is required to complete Annual Monitoring Reports to assess the extent to which the LDP strategy, policies and development sites are being delivered.

In order to ensure that there is a regular and comprehensive assessment of whether plans remain up-to-date the Council must undertake a full review of the adopted LDP at intervals not longer than 4 years from adoption.

The Ceredigion LDP Review Report 2017 set out the extent of changes required to the LDP and the revision procedure to be followed.

The purpose of this Topic Paper Update is predominantly to demonstrate whether, since the Deposit of the LDP was published and subsequently adopted in April 2013, there has been any change (in relevant guidance, policies or strategies; information and evidence; or issues highlighted through the formal Review Report 2017 and subsequent Annual Monitoring Reports (AMRs) or appeals) that suggests the issues addressed in the adopted LDP have changed or are not fully being addressed by the policies.

1. Executive Summary

- 1.1.1 This Topic Report Update for the Ceredigion LDP Proposed Strategy summarises and updates the findings of the Review undertaken in 2017.
- 1.1.2 In considering the findings of the Review Report 2017 and any further legislation, policy and evidence that may have arisen since then, the overall conclusion of this Updated Topic Paper for Preferred Strategy is that the retail policies of the LDP are generally fit for purpose.
- 1.1.3 It identifies the main issues to have presented themselves since the adoption of the LDP as:
- Well-being of Future Generations policy priorities.
 - Clarity of role and function for a retail hierarchy throughout the county so as to promote sustainable place making
 - An adequate retail land supply in Ceredigion for at least 5 years – to be kept under review.
 - Impact of the latest wider trends in shopping behaviour, particularly internet shopping, on the vitality of town centres and rural communities.
 - Refocus on mixed and diverse uses in town centres to maintain and preferably improve their vitality and sense of place.
- 1.1.4 This Topic Paper concludes that the LDP strategic policies adequately underline the retail hierarchy in Ceredigion in terms of function and scale, whilst maintaining the framework of Ceredigion's six main towns.
- 1.1.5 It considers in some detail the LDP performance since adoption against its monitoring targets in order to reflect on the extent to which Ceredigion's towns and Rural Centres are showing any signs of the impact of changing shopping trends and concludes that so far these seem to have performed relatively well against target, though elements of performance such as retail vacancy rates suggest that ongoing monitoring is important. The Paper notes that the LDP policies have a certain flexibility which militates for the support of mixed and diversified uses in town centres. As a precautionary

measure, it suggests that the designation of primary and secondary retail frontages in Aberystwyth and Cardigan be removed and that the appropriate mix of uses should be sought within town centre boundaries.

- 1.1.6 Finally, the Topic Paper recommends retaining existing retail allocations and revising monitoring indicators to reflect the range of uses identified as contributing to vibrant centres with a sense of place.

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2. Introduction

2.1.1 The Retail Topic Paper (December 2011) discussed how Retail is a key public policy aim of achieving social, environmental and economic sustainability and how this can be secured through the LDP. It considered the policy constraints, guidance and best practice that constrain the deliberations of the LDP.

2.1.2 This information was then used to determine the key issues which could be addressed by the LDP, retail objectives and finally in the development of policies.

2.2 Role of this paper

2.2.1 This update topic paper looks at what has changed since the previous Topic Paper was completed. It will update the summary table with any further issues and provide an analysis and conclusions to confirm or amend the findings of the Review Report 2017. If more detail is required to discuss any issues raised, this will be incorporated within this paper and will inform the Preferred Strategy.

2.3 Summary of Issues identified at Review

2.3.1 The Review Report concluded that the LDP was broadly compatible with Planning Policy Wales Chapter 10 (November 2016) and TAN 4, but suggested that more specificity would be required from policies S02-S04 as to what constitutes the retail centres of the settlement hierarchy. Subsequently, a jointly commissioned Retail Capacity Study (Carter Jonas, 2017) was published.

2.3.2 The Review Report summarised the latest investigation and analysis of retail in Ceredigion and the performance of LDP policies as follows:

2.3.3 The authority collaborated on a joint regional Retail Capacity Study, (RCS) prepared using the 2014 based population projections, which concluded that there was no requirement for additional retail allocation in the short to

medium term and identified a limited long term need for comparison and bulky goods, confined largely to the town centres of Aberystwyth and Cardigan which may be able to be met through the reuse of existing stock. The reliability of these findings is also a concern as retail forecasting beyond 5 years has inherent methodological weaknesses. The RCS has also recommended a regional retail hierarchy which outlines the strategic importance of Aberystwyth and the regional local significance of Lampeter and Cardigan, but places less importance on the centres of Aberaeron, Llandysul and Tregaron for retail needs. During 2015-16 a primary frontages review was commenced, which identified revisions required to monitoring, implemented in 2016/17 with the majority of targets now being achieved.'

- 2.3.4 The Topic Paper update table identified Wales national policy for regeneration, 'Vibrant and Viable Places' (2013) which considers retail directly in the section titled "Town centres serving 21st Century towns". The strategy considers that we need to support our town centres to explore and discover a different future, an alternative future. It states that the context over the next 10 years will be about the diversification of our high streets, reinforcement of what makes towns special, and the need to develop towns into destinations for living, working and leisure.
- 2.3.5 The future health of town centres is a significant issue in the light of wider trends in shopping behaviour associated with the growth of online shopping.
- 2.3.6 The overall conclusions of the Review 2017 suggest that the retail policies of the LDP are generally fit for purpose. Further assessment is required, however, to determine whether the LDP policies facilitate vital and vibrant town centres in Ceredigion. It was therefore suggested that the designation of primary and secondary retail frontages in Aberystwyth and Cardigan be reconsidered as to whether it is an effective mechanism to achieve this aim.
- 2.3.7 The next section deals with issues that have arisen in relation to Retail, since 2017, from changes in/new Policies, Strategies etc., changes in / new

evidence or information or issues raised in the AMR 2018 or in planning appeals.

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3. Update table

Review Trigger Type	Title	Date (Month/Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
Welsh Government's latest regeneration framework Vibrant and Viable Places sets out national goals and key principles for regeneration reviewed and revised in 2017	Vibrant and Viable Places	March 2013	Further consideration of implications for town centre vitality	This strategy outlines a number of national outcomes to achieve its aims and considers three key principles for regeneration. The Strategy considers that we need to support our town centres to explore and discover a different future. Objective set out within this framework are in line with Ceredigion's LDP. Detailed consideration should be given to the suitability of primary and secondary retail frontages in the light of changing trends.	Yes
An SPG was adopted in 2013 with regards to Aberystwyth Shopfront	Aberystwyth Shopfront and Commercial	May 2013	No change	This SPG is to help owners of commercial premises when looking to undertake works to commercial	No

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
and Commercial Façade Design	Façade Design Guide SPG			facades and shopfronts within Aberystwyth and provides the details which support planning policies contained in the LDP.	
In July 2013, a task and finish group was set up by the Welsh Government to consider the possibility of a Local Growth Zone (LGZ) in the Teifi Valley. In Nov 2014, a further group was created to oversee the implementation of recommendations.	Teifi Valley Local Growth Zone	July 2013	Superseded	Obsolete. The Teifi Valley Group was disbanded in 2016 following limited progress of a Local Growth Zone.	No
An amendment has	Town and	2014	No change	New legislative changes to part of the	No

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
arisen to the Town and Country Planning (General Permitted Development)	Country Planning (General Permitted Development) (Amendment) (Wales) Order 2014			Town and Country Planning Order providing more flexibility on permitted development and applying some environmental protections. LDP remains compatible..	
New legislation in the form of the Well-being of Future Generations Act has been adopted.	Well-being of Future Generations (Wales) Act 2015	April 2015	No change	In brief, this Act requires that all projects, policies and plans consider economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle. The Act puts in place 7 wellbeing goals: <ul style="list-style-type: none"> • A globally responsible wales • A prosperous Wales 	No

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				<ul style="list-style-type: none"> • A resilient Wales • A healthier Wales • A more equal Wales • A Wales of cohesive communities • A Wales of vibrant culture and thriving Welsh Language <p>The goal most relevant to retail is a prosperous Wales</p> <p>This goal reinforces the policies within the LDP and does not at this stage require any changes to the LDP</p>	
New Legislation	Planning (Wales) Act	July 2015	No further investigation required.	The Act sets out a series of legislative changes to deliver reform of the planning system in Wales, to ensure that it is fair, resilient and enables development. The act is complemented by existing and	No

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				proposed changes to secondary legislation, policy and guidance.	
New Legislation	Environment (Wales) Act	March 2016	No further investigation required.	<ul style="list-style-type: none"> • The act puts in place legislation needed to plan and manage Wales natural resources in a more proactive, sustainable and joined up way. It enables us to: • Approach environmental challenges presented and focus on the opportunities our resources provide; • Establish statutory emission reduction targets and carbon budgeting to support their delivery; • Improve waste management processes; and • Clarify the law for environmental 	No

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				regulatory regimes including shellfisheries management, marine licencing, flood risk management and land drainage.	
Wales Rural Development Programme 2014 – 2020 document released	Welsh Government Rural Communities Wales Rural Development Programme 2014 – 2020 (2015)	May 2015	No change	Priorities set out within this programme are in line with Ceredigion's LDP.	No
Ceredigion Council Regeneration Strategy	Ceredigion for All: Our Livelihoods, Our Economic Regeneration Strategy 2014-	June 2015	No change	The aim of the Strategy is to address some of the key challenges evident within the county. It does not currently create a need to amend the retail policies of the LDP itself.	No

Review Trigger Type	Title	Date (Month/Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
	2020				
Legislation relating to internal operations for retail use: mezzanine floors.	Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2015	2015	Keep under consideration	This has to date caused no issues in regard to the expansion of out of centre retail units however in the future it may cause an increase in applications regarding the expansion of retail floor space and the impact this will have on the vitality and viability of town centres will need to be monitored. However, this amended order should help strengthen the protection provided for town centre vitality consistent with existing LDP retail policies.	No
Welsh Government Technical Advice Note update published.	Welsh Government TAN 4 Retail and Commercial	November 2016	Further Investigation required – Policy Update	The TAN was updated to reflect changes made to PPW, the LDP is broadly compatible with the amendments to TAN 4 as it was	Yes

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
	Development			prepared with the draft legislation. More specificity in relation to retail hierarchies was considered at Review but it was felt that the settlement hierarchy of USCs, RSCs and Linked Settlements and the retail role and scale requirements in the LDP retail policies was found to be generally compatible with this requirement.	
Retail Capacity Study jointly commissioned with PCNPA and PCC	Retail Capacity Study 2017	February 2017	No Further Investigation required	The jointly commissioned Retail Capacity Study highlights that there is no capacity for further Convenience, Comparison and Bulky goods need in the short to medium term. Any small requirement that may exist across the urban service centres can be met in the natural churn of existing stock. In	No

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				<p>the longer term some small amounts of need arise particularly focussed in the larger centres of Cardigan and Aberystwyth. However forecasting of this nature beyond a 5 year period is notoriously unreliable. The RCS outlines a potential retail hierarchy the 2017 Review Report concluded is adequately addressed in the settlement hierarchy of Urban and Rural Service Centres and Linked Settlements. The Council continues to acknowledge 6 main towns across Ceredigion. The Local Planning Authority recognises the de facto more limited retail offer of Tregaron, Aberaeron and Llandysul, in a practical</p>	

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				sense by reference to appropriate scale of development in its retail policies. The RCS contains town centre health checks which point to relatively healthy performance of urban high streets and offers settlement specific recommendations which could inform any future master plans or place plans.	
New local non-planning policy documents	Ceredigion Local Well-being Plan 2018-2023 May 2018	May 2018	Review LDP objectives and policy against the local Well-being aims.	The Ceredigion Local Well-being Plan is based on the guiding principles of community and individual resilience, setting out 6 well-being aims designed to be mutually supportive. In respect of retail, the aims with which the LDP objectives need to align are the 3 Community Resilience aims, in	No

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				<p>particular:</p> <p>'Enable communities to become prosperous, sustainable and connected by supporting the transformation of economic prospects'.</p> <p>As with the WCFG (Wales) Act, the Local Well-being Plan reinforces the policies within the LDP and does not at this stage require any changes to the LDP in respect of retail.</p>	
	Emerging NDF 'Growing Mid Wales' (GMW)	2018	Keep a watching brief for emerging drafts.	This is a very important emerging document which provides a Wales strategic overview of subject topics under consideration for enhancing the Mid Wales economy. At present the	No

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				growth deal is still being negotiated therefore firm plans are not available but the LDP Preferred Strategy will ensure no policies stifle these future ambitions	
Call for evidence	GMW Baseline Evidence	July 2018	Further consideration in preparation for Preferred Strategy	Evidence for retail includes: Retail sector constitutes 10.6% of the employment generating sectors for mid Wales. 90% of the retail sector are micro businesses. There has been a large reduction in the number of retail enterprises which has fallen by 14.7% since 2010. This points to the need to continue to monitor LDP retail policies against revised AMR targets to guard against loss of vitality in the town	No

Review Trigger Type	Title	Date (Month/Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				centres. At present, the RCS 2018 suggests Ceredigion has relatively healthy town centres.	
Call for evidence	GMW Strategic Economic Priorities	December 2018	No change	Objective 2 is for a competitive and sustainable Mid Wales. Part of its focus is on 'foundation' sectors of the economy, including retail. It's Objective 3 is for a connected and distinctive Mid Wales, with priority given to fast digital connectivity for businesses including retail, for competitive edge. The LDP policies are compatible with these objectives.	No
New Legislation	PPW 10	December 2018	Further Investigation required – Policy Update	The new Wales Planning Policy document has been entirely reframed to reflect the well-being goals set out in the WCFG (Wales) Act, 2015. It	Yes

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				<p>establishes objectives to serve well-being goals. It deals with retail policy in the context of placemaking for 'active and social places'. It promotes location of major trip generating developments such as retail, which are, or can be, easily reached by walking or cycling, and are well served by public transport and refers to diversifying retail and commercial centres so they can adapt to future retail trends including the continued rise in internet shopping. It requires planning authorities to establish a hierarchy of retail and commercial centres. It maintains 'sequential' testing as per previous editions.</p>	

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				The LDP is compatible with the updated, well-being focus of PPW. More specificity in relation to retail hierarchies was considered at Review but it was felt that the settlement hierarchy of USCs, RSCs and Linked Settlements and the retail role and scale requirements in the LDP retail policies was found to be generally compatible with this requirement.	
Performance of AMR Indicator 12a	Annual Monitoring Report	2018	Ongoing monitoring required	SA Objective 12a – ‘Encourage a vibrant and diversified economy’ has been monitored annually since plan adoption as part of the Annual Monitoring Report. This indicator has been assessed follows: <ul style="list-style-type: none"> Percentage of premises vacant in 	Yes

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				<p>the town centres of Aberaeron, Aberystwyth, Cardigan, Lampeter, Llandysul and Tregaron - 0 – Targets are not being achieved.</p> <ul style="list-style-type: none"> • % of retail uses on primary retail frontage + Target being met or exceeded • % of retail uses on secondary retail frontage + Target being met or exceeded. • Footfall levels in Aberystwyth + Target being met or exceeded. <p>With the exception of vacancy rates for town centre retail premises, where monitoring results have pointed to the need for careful monitoring since 2016, performance against the sustainability</p>	

Review Trigger Type	Title	Date (Month/ Year)	Action	Further comments (Summary of effect and analysis of likely impact on LDP)	Further discussion in Topic Paper Required?
				objectives of the LDP has shown a general improvement over the plan period to date. The 2018 AMR concluded that within the context of the SA/SEA, the overall effect of the LDP does not raise any concerns at the present time.	

3.1 Conclusion on the extent of new issues for further consideration

3.1.1 Table 1 above provides details of the legislation/guidance/policy and new/updated evidence which informed the conclusions of the Review Report. It also consecutively updates with new information since the previous topic paper was published, including analysis from the latest AMR. As noted in the final column of the table, the only updates requiring further discussion as to their impact on the LDP are 'Vibrant and Viable Places' 2013, TAN 4 2018 and PPW 10 2018 in relation to retail hierarchy and the latest AMR 2018. The next section summarises the conclusion of the Review 2017 and the Preferred Strategy update and deals with matters identified in Table 1 as requiring further consideration.

4. Review Issues (Triggers)

4.1.1 The following issues have emerged from the assessment in the Review 2017 and in this update Topic Paper:

Review 2017

- Well-being of Future Generations policy priorities.
- Clarity of role and function for a retail hierarchy throughout the county so as to promote sustainable place making
- An adequate retail land supply in Ceredigion for at least 5 years – to be kept under review.
- Impact of the latest wider trends in shopping behaviour, particularly internet shopping, on the vitality of town centres and rural communities.
- Refocus on mixed and diverse uses in town centres to maintain and preferably improve their vitality and sense of place.

Update

4.1.2 The only element in the Update Topic Paper raising potential further issues is the 2018 Annual Monitoring Report. This latest report provides a useful illustration of the relative health of Ceredigion's high streets overall but also where there may be some vulnerability – it therefore helps to focus on more precise/nuanced elements which may benefit from policy review. A detailed summary will therefore assist in setting the scene against which to identify or confirm review issues.

Performance of the AMR LDP Monitoring Indicators

4.1.3 Performance against the LDP Monitoring Indicators shows that retail targets are predominantly being achieved and there are no significant concerns over implementation of retail policy.

LDP Monitoring Indicators Policies S01 – S04, LU12, LU13, LU18, LU19, LU20, LU21 and LU22	2014	2015	2016	2017	2018
AMRE05 – Town Centres <ul style="list-style-type: none"> At least 80 % of all major office, retail and leisure development (development over 800 gross sq. m) to be in the Town Centres. 	+	?	?	+	+
AMRE06 – Vitality of Rural Service Centres. <ul style="list-style-type: none"> Stable or increasing number of facilities in a Service Centre. 	+	+	+	+	+
AMRE07 – Retail Frontages <ul style="list-style-type: none"> Stable or increasing retail use on Primary Retail Frontages in Aberystwyth and Cardigan. Stable or increasing retail use on Secondary Retail Frontages in Aberystwyth and Cardigan. 	0	0	+	+	+

4.1.4 AMRE05: The target has been met and there are no concerns over the implementation of the policies.

4.1.5 AMRE06: Results pertaining to the number of key facilities in Rural Service Centres since adoption have been fairly constant. Whilst it is noted that there has been minor variation in the number of some facility types including Post Offices, Public Houses and Village Halls for example, detailed analysis has identified minor errors in survey classifications and historic reporting. Further, there is some concern that the monitoring and performance figures are somewhat deceiving, for example where key facilities are located outside defined settlement boundaries, e.g. in Pontarfynach and Bow Street the data used to measure performance does not wholly reflect changes to uses since the amenities survey was established. There has been no significant

variation in the numbers and types of facilities in Rural Service Centres in recent years. In respect of services and facilities in Centres, since the LDP has only been the basis for decision making since April 2013 it is too early to tell if this strategy is having an effect on retaining or enhancing them.

- 4.1.6 AMRE07: The combined primary and secondary frontages in Aberystwyth and Cardigan are all meeting the required policy targets of 75% (Primary) and 50% (Secondary), with the exception of the Aberystwyth Primary frontage at 69.5%. In Aberystwyth for Primary Frontages, the proportion of retail uses varies from between 88.9% to 57.1%; for Secondary Frontages between 76.9% and 26.7%. In Cardigan for Primary Frontages, the proportion of retail uses is 75% in one frontage & 76.9% in the other primary retail frontage areas, for Secondary Frontages varying between 90.9% and 28.6%.
- 4.1.7 It should also be noted that the (adopted) indicator monitors the performance of A1 uses only. Policy LU21 defines retail as A class and not A1 specifically and the policy is applied as such.
- 4.1.8 If you were to consider A class uses (and not only A1) all Primary and Secondary retail frontages in both Aberystwyth and Cardigan would be well in excess of the 75% and 50% requirement. When considering A class uses (including use classes A1, A2 and A3), primary frontages in Aberystwyth range from 80 – 100% (combined 91.4%) and in Cardigan 95.8 – 100% (98% combined) and secondary frontages in Aberystwyth range from 80 – 100% (combined 89.2%) and in Cardigan range from 71.4 – 100% (combined 89.5%). This picture indicates that all frontages are all exceeding required policy targets.
- 4.1.9 The Primary and Secondary retail frontages for Aberystwyth and Cardigan have narrowly missed their target by 1% or been met or exceeded their target for A1 uses. However, when considering A class uses (including use classes A1, A2 and A3), all frontages are exceeded.

4.1.10 Given that Policy LU21 defines retail as A class and not A1 specifically and the policy is applied as such there are no concerns over the implementation of policies.

Performance of the AMR Sustainability Objective 12a

4.1.11 Performance against the sustainability objectives of the LDP has shown a general improvement over the plan period to date in all but the indicator for the percentage of premises vacant in the town centres of Aberaeron, Aberystwyth, Cardigan, Lampeter, Llandysul and Tregaron.

SA12a Encourage a vibrant and diversified economy: Indicators	2014	2015	2016	2017	2018
Percentage of premises vacant in the town centres of Aberaeron, Aberystwyth, Cardigan, Lampeter, Llandysul and Tregaron	+	+	0	0	0
% of retail uses on primary retail frontage.	0	0	+	+	+
% of retail uses on secondary retail frontage	0	+	+	+	+
Footfall levels in Aberystwyth	?	?	?	+	+

4.1.12 According to the Welsh Retail Consortium – Springboard Footfall and Vacancy Monitor, Footfall and vacancy rates across Wales have fluctuated significantly over recent years, realising a significant drop in footfall in 2011, which coincided with overall vacancy levels topping 13%. Since then subsequent increases, over and above those experienced throughout the UK have been realised and significant improvement in footfall levels across Wales has been achieved since July 2013. However early 2018 footfall decreases in town centres demonstrated a drop, with February seeing a

2.3% fall on last year's figures, snowy conditions over winter may have contributed to the decline.

- 4.1.13 In Ceredigion, shop vacancy rates are highly variable between Town Centres. The average shop vacancy rate within Ceredigion's Town Centres is 14.9%. This figure compares to 13.6% (2017), 7.6% (2016), 9.1% (2015) and 11.9% (2014). This is on a par with the UK vacancy average, which according to the Local Data Company was 12.3% in June 2015. Therefore, with the exception of Llandysul (28.6%) and Tregaron (21.4%) all town centres are performing better than the national average and overall, the situation is an optimistic one, particularly as Aberystwyth, which is by far Ceredigion's largest shopping centre, has a vacancy rate of just 9.9%. Tregaron and Llandysul face particular issues of rurality, low population and internet shopping all of which contribute to poor footfall and the demise of the high street.
- 4.1.14 Footfall surveys have been conducted in Aberystwyth annually since 2012. It is noted that not all locations were recorded this year and last year, however, of the locations that were recorded, totals of footfall remain similar to previous years. The total footfall recorded in 2017 (12,351), was positive, (especially as the clock tower locations were only monitored for half the time than usual due to a lack of surveyors), being higher than that recorded in 2016 (10,144) and 2015 (9886). Notwithstanding this positive result, given the relatively short period over which the survey has been conducted, it is not possible to draw any major conclusions to date. It was expected that the opening of both Tesco Super Store and Marks and Spencers (the Mill Street Development) has the potential to impact on footfall patterns in Aberystwyth and the significant increase in footfall measured across the town appears to bear this out.

5. Analysis (Options for Addressing the Issue)

- 5.1.1 The overall conclusions of the Review 2017 suggest that the retail policies of the LDP are generally fit for purpose.

- 5.1.2 The LDP has been assessed against the Well-being of Future Generations Act¹, concluding that the LDP is broadly consistent with national well-being goals.
- 5.1.3 The national planning policy requirement for the identification of a retail hierarchy is considered to be adequately addressed in the LDP settlement hierarchy of Urban and Rural Service Centres and Linked Settlements. The Council continues to acknowledge 6 main towns across Ceredigion. The LDP recognises the de facto more limited retail offer of Tregaron, Aberaeron and Llandysul, in a practical sense by reference to appropriate scale of development in its retail policies. The Retail Capacity Study (Carter Jonas, 2017) contains town centre health checks which point to relatively healthy performance of Ceredigion's urban high streets and offers settlement specific recommendations which could inform any future master plans or place plans.
- 5.1.4 Further assessment is required, however, to determine whether the LDP policies effectively facilitate the maintenance of vital and vibrant town centres in Ceredigion, by considering diversification to stimulate activity and a lively sense of place for resilient communities. It was therefore suggested that the designation of primary and secondary retail frontages in Aberystwyth and Cardigan be re-examined as to whether it is an effective mechanism to achieve this aim.
- 5.1.5 As indicated in the final column of Table 1, and discussed in more detail in Section 4, there are just a couple of triggers since 2017 which give rise to the need for further detailed consideration in respect of the retail policies of the LDP, with vitality and place making and the health of retail centres remaining an important focus to ensure that policy supports this aim as internet shopping and wider economic trends impact on traditional spaces.

¹ Background Paper: 'Local Development Plan and Well-being – A report considering how the Ceredigion Local Development Plan (LDP) reflects the National Well-being Goals for Wales' January 2017

5.1.6 As part of preparation of the Preferred Strategy, consideration will therefore be given to whether primary and secondary frontages are appropriate and / or whether the targets are realistic and/ or whether a different measure would best show the performance of the primary and secondary frontages - particularly given the changing nature of the British high street, where leisure and recreation uses are as an important a driver of economic growth as traditional A1 retail shop space frontages.

6. Conclusions / Recommendations

6.1.1 Retain Objectives 2,3,5,7 of the LDP

6.1.2 Retain Strategic Policies S01-S04 in respect of the retail development hierarchy and associated expectations for function and scale of development.

6.1.3 Retain policies LU18, LU19, and LU20

6.1.4 Maintain the reference to 'A Class' in Policy LU21 in order to retain the current flexibility which is consistent with the need to recognise the need for mix and diversity of uses in town centres to secure vitality.

6.1.5 Make a minor amendment to Policy LU21, 'Change of Use from an Existing Retail Use' to remove primary and secondary retail frontages and to present a focus on the maintenance of a vital and vibrant mix of uses with significant retail function within retained town centre boundaries.

6.1.6 Make minor amendments to Reasons for Policies in Strategic Policies where necessary to reflect changes in legislation and to explain retail hierarchy in terms of what constitutes rural sustainability. Similarly make minor amendments to Reasons for LU policies to reflect changes in legislation, etc.

6.1.7 Retain town centre boundaries in the 6 main towns.

- 6.1.8 Retain existing retail allocations (technical question – what if BUILT?)
- 6.1.9 Consider revising Monitoring Indicator AMRE07 to include all A Class uses rather than A1 only.

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