CD 1.7

MILTON KEYNES LOCAL PLAN

Inquiry Topic Paper 5

Town Centres and Retail Strategy

April 2003

MILTON KEYNES COUNCIL

Core Document Reference No. **CD 1.7**

Contents

Abbreviations used throughout the Topic Papers

MK: Milton Keynes

MKC: Milton Keynes Council

BCC: Buckinghamshire County Council

EP: English Partnerships

GOSE: Government Office for the South East

ODPM: Office of the Deputy Prime Minister

SEERA: South East England Regional Assembly

DV1: first deposit version of the MK Local Plan (Sept 2000)

DV2: second deposit version of the MK Local Plan (Oct 2002)

PIC: Pre Inquiry Change to the MK Local Plan (April 2003)

MK&SM Study: MK and South Midland Sub Regional Study (2002)

PPG: Planning Policy Guidance Note

RPG: Regional Planning Guidance

SPG: Supplementary Planning Guidance

'CD' references in brackets refer to documents on the Core Document list for the Inquiry

Other abbreviations used in this Topic Paper

RSR2: Retail Strategy Review Stage 2 study (CB Hillier Parker)

CBHP: CB Hillier Parker

See also Glossary (Appendix 1) for explanation of other terms used in this Topic Paper

1 Introduction

1.1 This Topic Paper deals with Town Centre and Retail Strategy issues in the LP period up to 2011, and objections to those policies. Although CMK is referred to in this paper, issues associated with its development and objections to the CMK policies in the plan will be covered in a separate Topic Paper.

1.2 This paper covers the main shopping centres within the Borough, including the older town centres of Bletchley, Stony Stratford and Wolverton within the City, and Newport Pagnell, Olney and Woburn Sands outside the City. All of these centres pre-date the designation of MK as a new town. It also covers the new district centres in the City at Kingston and Westcroft. Maps showing the location of the main shopping centres and retail warehousing in the Borough are included at Appendix 2.

1.3 As the largest new town in the UK and fastest growing local authority area in the country, Milton Keynes is unique. In terms of shopping provision it is different to most other urban areas in several important respects.

- The City has a planned hierarchy of shopping centres, ranging from local centres to a new city centre (CMK)
- It has been possible to accommodate new forms of retailing much more easily than in a conventional town
- All centres in the hierarchy have been planned to be accessible by a variety of means of transport, not just the private car.
- The City has been planned so that most new residents would be within a short distance (500 metres) of a local centre.
- New shopping facilities have been provided in a co-ordinated manner, linked to population growth. Since the days of the development corporation, a retail strategy - reviewed at regular intervals - has guided shopping provision and provided a framework for resisting new development in less accessible locations.

1.4 The City has experienced rapid growth in retail provision in recent years. Between 1993 and 2002, the amount of shopping floorspace in the Borough has increased from about 420,000 sq.m to about 580,000 sq.m - an increase of nearly 40%. Major retail development in the past 10 years has included:

- The expansion of retail facilities at Kingston
- The opening of Westcroft and subsequent expansion of the Safeway food store
- A new food store in Newport Pagnell
- About 14,000 sq.m of new floorspace in the western extension to the CMK Shopping building (now known as ‘the centre:mk’)
- The opening of Midsummer Place in CMK (in 2000) - about 38,000 sq.m of new floorspace, including a Debenhams department store and over 40 shop units
- New retail warehousing at Eldergate in CMK (next to the National Hockey Stadium, Winterhill, Rooksley and Watling Street in Bletchley

1.5 Assuming the Structure Plan housing allocation is achieved, the population of the Borough is forecast to increase from 207,000 in 2001 to 248,000 in 2011 – an increase of about 20%. Apart from population growth, demand for new floorspace may also arise for the following reasons:

- major retailers seeking to expand - to widen the range of goods they offer and to protect their market share
- retailers wanting to introduce new formats, and
- existing operators seeking to relocate, because their present premises no longer meet their requirements.

1.6 To meet these future needs a significant amount of further retail development is planned or being promoted including:

- A major extension to 'the centre:mk' for about 50,000 sq.m of comparison floorspace; 3,400 sq.m of convenience floorspace; 9,000 sq.m of Class A3 uses (restaurants, cafés etc); office / leisure / community floorspace; an enhanced market; and 215 dwellings. The Council's Development Control Committee resolved to grant outline planning permission for this development, subject to completion of a Section 106 legal agreement, on 16 April 2003. It is due to be implemented in 3 phases up to 2012.
- An integrated mixed-use development, including a large new food store in CMK on Block C4.1 at Avebury Boulevard / Witan Gate, CMK (see PICs 26-29)
- An integrated mixed-use development, including a large new food store in Bletchley town centre (Policy TC15).
- Enabling retail development associated with the stadium proposal on Denbigh North.

1.7 The growth of shopping provision - mainly in CMK and at Kingston and Westcroft - has meant increased competition for the older town centres. To help regenerate these centres, the Council has been involved in a number of town centre initiatives, usually in partnership with local residents and other agencies, designed to improve their attractiveness, vitality and viability.

1.8 In **Wolverton**, following the designation of the Conservation Area in December 2001, a number of initiatives are being pursued through the Wolverton Heritage Economic Regeneration Scheme funded by English Heritage, MKC and the Single Regeneration Budget. These include improvements to public transport facilities; improvements to pedestrian access between Church Street and The Square; and landscaping adjacent to the Agora centre. As a result of the 'Future Wolverton' project (sponsored by the Countryside Agency, English Heritage, MKC and Wolverton and Greenleys Town Council) residents have produced an Action Plan to implement a 20-year vision for the improvement of the town.

1.9 In **Newport Pagnell**, a number of environmental improvements are being implemented through the Townscape Heritage Initiative, funded by English Heritage, MKC and Newport Pagnell Town Council. Apart from pedestrian improvements along the High Street, shop fronts are being improved and efforts are being made to bring vacant floorspace back into use.

1.10 In **Stony Stratford**, a health check of the town - including the town centre - is being funded by the Countryside Agency. This may generate ideas for town centre improvements.

1.11 In **Bletchley**, a number of small-scale environmental improvements are in progress or are planned. Current work on central Bletchley is described in more detail below (see paras 4.13 - 4.14).

2 Key policy objectives

2.1 The key policy objectives relating to town centres and shopping are to:

- Sustain and enhance the vitality and viability of CMK and other town centres, by focusing retail development and other key town centre uses within these centres.
- Encourage a switch away from the car to other forms of transport
- Encourage more mixed use development in CMK and other town centres.
- Improve the attractiveness of older town centres
- Maintain and enhance village facilities
- Plan so that most new dwellings within the City Expansion Areas will be within 500 metres walking distance of a local centre.

3 Wider policy context

3.1 Government policy on town centres is set out in PPG6: Town Centres and Retail Developments (June 1996), supported by a number of subsequent parliamentary answers and ministerial statements [1].

3.2 Other relevant guidance includes government responses to Select Committees [2] in July 1997 and May 2000; PPG11: Regional Planning (October 2000); and PPG13: Transport (March 2001).

3.3 Key features of this guidance include the need to:

- Sustain and enhance the vitality and viability of town centres
- Adopt a sequential approach to selecting sites for development for retail, employment, leisure and other key town centre uses
- Adopt a plan-led approach to promoting development in town centres, both through planning policies and the identification of sites for development.

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[1] These include parliamentary answers given by the then Planning Ministers, Nick Raynsford (5.12.97) and Richard Caborn (11.2.99); Mr Caborn's contribution to a debate in the House of Commons on 11 March 1999; and a recent parliamentary statement by the Office of the Deputy Prime Minister on Town Centre Planning Policies (10.4.03)

[2] Responses to the House of Commons Select Committee on the Environment – Shopping Centres (July 1997) and the Environmental Impact of Supermarket Competition (May 2000)

- Promote more sustainable transport choices and reduce the need to travel, especially by car
- Promote more mixed-use development and the retention of important town centre uses
- Draw up a town centre parking strategies
- Promote good urban design, including car parks that are attractive and secure
- Satisfy a series of tests to apply to applications for new retail or leisure facilities
- Ensure that there is a wide range of shops, employment, services and facilities available and easily accessible by a choice of means of transport.

3.4 PPG6 also recognises that it may not be possible to accommodate some types of retailing, such as large stores selling bulky goods, on suitable sites either in or on the edge of town centres (PPG6 para 3.3). However, the Parliamentary Statement of April 2003 states that developers and retailers must demonstrate that a majority of their goods cannot be sold from town centre stores, and that developments for the sale of bulky goods are not exempt from meeting the policy tests in PPG6 and subsequent statements.

3.5 The same Statement also emphasises that quantitative need should be the primary consideration, above qualitative factors, when assessing new retail proposals.

Regional / sub-regional context

3.6 RPG9 (CD 7.2) identifies MK as a potential growth area for the South East region (para 4.24). Policy Q5 states that 'the region's existing network of larger town centres should be the focus for major retail, leisure and office developments, to support an urban renaissance, promote social inclusion and encourage more sustainable patterns of development.'

3.7 This policy reflects the following key development principles for the region:

- Urban areas should become the main focus for development
- The pattern of development should be less dispersed with more sustainable patterns of activity, allowing home, work, leisure, green spaces cultural facilities and community services to be in close proximity
- Access to jobs, services, leisure and cultural facilities should be less dependent on longer distance movement and there should be increased ability to meet normal travel needs through safe walking, cycling and public transport with reduced reliance on the car

Structure Plan

3.8 Key policies in the Buckinghamshire County Structure Plan (CD 7.1) include:

- Maintaining and enhancing the role of CMK as an emerging regional centre (Policy S2).

- Bletchley, Newport Pagnell, Olney, Stony Stratford, Wolverton, Kingston and Westcroft are defined as district centres (S2).
- There should be further expansion of CMK to serve the needs of a growing local population and to maintain its service to a wider area in line with its emerging regional status in the retail hierarchy (S3)
- Maintaining and strengthening the vitality and viability of each town centre and supporting greater diversity in town centres, including new housing where appropriate (TC1)
- Not permitting major non-retailing developments (leisure, entertainment and cultural facilities) outside town centres where they would harm the vitality and viability of a town centre (TC3)
- Tests for assessing out-of-centre shopping proposals (S5)

4 Other studies

The MK Planning Manual (CD 6.2)

4.1 The Planning Manual (pages 111-112) explains the approach of the Development Corporation to retail provision within the City – a combination of concentration (in CMK) and dispersal (local shops within 500 metres of most residents).

Retail Strategy Review (1999)

4.2 MKC commissioned CB Hillier Parker (CBHP) to undertake this study, which was published in September 1999 (CD 14.3). The purpose of this study was to assist the Local Plan Review by developing a comprehensive and robust retail strategy for the whole of the MKC area up to 2011. An important requirement was to provide updated retail spending and capacity forecasts and to identify the most appropriate locations for any retail development, if a need for additional retail development (comparison or convenience floorspace) was identified.

4.3 Much of this work was based on the results of an existing Household Interview Survey of shopping patterns in MK commissioned by Development Planning Partnership (DPP) and carried out in May 1998, in preparation for the public inquiry into the proposed expansion of the Tesco store at Kingston. It is important to note that these forecasts were interim ones because Midsummer Place and the Xscape building in CMK had not been completed at the time of the study.

4.4 The study also took into account the principles set out in the Directions Paper, and the results of various studies and development proposals for CMK and other centres within the Borough. The terms of reference for the study included the following:

- An assessment of the performance of existing retail floorspace in MK and forecasts of capacity to support additional retail floorspace up to 2011.

- A locational strategy for accommodating new retail development within the Borough.
- Clear views on the role and potential of CMK and other centres, taking into account development potential, design considerations etc.
- The appropriate level, nature and location of retail provision required to serve the proposed City Expansion Areas

4.5 The key findings of the RSR2 study, were:

- Following the opening of Midsummer Place there was likely to be an oversupply of durable goods shop floorspace in the City until about 2009/2010.
- There was no need to allocate any additional sites for retail development in CMK in the new Local Plan.
- Sites should be identified for new food stores in Newport Pagnell and Bletchley. In Bletchley, CBHP considered that securing a new town centre food store to be fundamental to the regeneration of the town centre. They recommended the general area currently occupied by Stephenson House and the adjoining car park be considered as a potential site for a food store. (Site MK8)
- There is no need to allocate additional sites for retail warehousing, until 2006, unless they are for the replacement of out of date retail warehouse floorspace.
- There should be a more flexible approach to local centres including the sub-division and amalgamation of units in such centres

Further work on retail spending and capacity since DV2

4.6 In May 2002, a new household interview survey of MK and its catchment area was commissioned by DTZ, on behalf of the joint owners of 'the centre:mk'. This survey together with a Retail Assessment Report was submitted by DTZ in support of the planning application for the major extension to 'the centre:mk'.

4.7 MKC and EP employed CBHP to independently review this work and to set out their conclusions on DTZ's findings. CBHP concluded that phased development of 'the centre:mk' in accordance with the planning application would be supported by available expenditure in the catchment area, with only marginal increases required in the market share attracted to CMK

4.8 They also considered that this proposed development would be unlikely to have substantial adverse impacts on other town centres. On this basis the Council raised no objection to the scheme on grounds of retail impact and has resolved to grant planning permission (see para 1.6 above).

4.9 The work done by CBHP on the DTZ Household Interview Survey (2002) and expansion of 'the centre:mk' has only reviewed the durable goods retail capacity forecasts for CMK. However, in addition to the proposed major extension of 'the centre:mk' and other proposals identified above (para 1.6), a number of other planning applications for new retail development have recently been submitted elsewhere in MK. These include:

- A proposed new superstore on the Leisure Plaza site in CMK (Block A4.1-A4.2), currently the subject of an appeal against non-determination (public inquiry scheduled for June 2003).
- A proposed new B&Q Warehouse store of about 10,400 sq m gross retail floorspace (plus garden centre and bulk store) on a site between Patriot Drive and H5 Portway at Rooksley.
- A proposed new Homebase store of around 7,430 sq m gross on the bus depot site at Winterhill.

4.10 In order to consider these proposals on a comprehensive basis, in December 2002 CBHP were commissioned by EP and MKC to extend their previous retail capacity forecasts for CMK to include forecasts of the capacity for additional retail floorspace for convenience and durable goods in MK as a whole up to 2012.

4.11 The study required CBHP to forecast the capacity for additional food and convenience goods floorspace in CMK and elsewhere within the City, given proposed developments over the study period. CBHP also prepared forecasts of the capacity for additional retail warehousing in MK as a whole.

4.12 The preliminary conclusions of this work by CBHP, which has not yet been finalised are as follows

- In the light of revised forecasts, CBHP considered that there would be capacity for the phased development of 'the centre:mk' (see also para 1.6).
- CBHP forecast that there would be sufficient expenditure available to support a proposed new super store on Block C4.1 in the Residential Quarter of CMK, and new convenience retail floorspace in the extension to the shopping centre, including a relocated Waitrose food store, if coupled with the closure of the existing Sainsbury and Waitrose store in the Food Centre, by about 2006. CBHP do not expect these replacement and new stores in CMK to have a significant adverse effect on the other main food stores in the town.
- Their forecasts also show that in addition to these proposed replacement and new food stores in CMK, there would be sufficient expenditure available to support a new food superstore in Bletchley town centre, if this was accompanied by closure of the existing Sainsbury and Kwik Save stores in that centre.
- CBHP forecasts show that there would be capacity for the proposed new B&Q Warehouse store at Rooksley, and proposed Homebase store on the bus depot site by about 2008 (although this would marginally increase the current oversupply of general retail warehouse floorspace as a result of Homebase moving out of its existing store). If these two new DIY goods stores open before 2008, there would be some risk to the existing Focus and B&Q stores (at Kingston and Bletchley respectively), and/or the new B&Q and Homebase stores would take a few years to reach their full

trading potential. However, CBHP anticipate there may be capacity for 1 new DIY goods store before 2006.

- There is currently an oversupply of general retail warehouses in MK, with the result that there are currently 3 vacant retail warehouses, and the existing retail warehouses are collectively currently trading at below a level based on estimated company averages. CBHP are therefore unable to forecast capacity for any additional general retail warehouses (other than DIY goods stores) until about 2007.
- Although CBHP have not specifically modelled and evaluated the effects of the proposed enabling retail development related to the proposed stadium at Denbigh North, their work so far suggests that there would not be sufficient capacity for this retail development in addition to the developments proposed in CMK and Bletchley town centre (both food and non-food) before the end of the forecasting period (2012). In capacity terms, any proposed enabling retail development would therefore need to be seen as an alternative to the proposed new food stores and DIY goods stores elsewhere in the town, rather than as a potential addition, at least until about 2012.

Central Bletchley Stage 2 Study

4.13 At the end of 2002, EP, MKC, the Bletchley Development Board and SEEDA commissioned EDAW to prepare a development framework and action plan for the regeneration of Central Bletchley. The aim of this framework and action plan is to take forward the vision set out in the Bletchley Regeneration Study (CD 14.2), the main elements of which have been incorporated into Local Plan strategic Policy S6 for Bletchley.

4.14 EDAW has not yet produced a final report and conclusions. However, the report is expected to be available before the Local Plan Inquiry opens in July. If the final report has any significant implications for the Local Plan policies for Bletchley town centre, the Council may need to respond either in a proof of evidence on relevant Bletchley town centre policies or through a supplement to this Topic Paper.

5 Evolution of the Plan

Issues Papers

5.1 Issues Paper 7: Town Centres (CD 3.7) identified 21 questions on key issues relating to town centres and shopping. Among these issues were changes to the boundaries of the older town centres.

Directions Paper (CD 3.11)

5.2 In terms of retail strategy, the Council agreed to adopt a sequential approach to new retail development, focussing such development on existing centres as far as possible.

5.3 The Directions Paper also acknowledged that retailing is a very dynamic activity where things can change very quickly, and that there are strong development pressures in the area. MKC agreed to commission a second stage of the Retail Strategy Review (see paras 4.2 - 4.5 above) to inform the new Local Plan.

First Deposit Plan (CD 3.12)

5.4 DV1 reflects and incorporates the conclusions and recommendations of the Retail Strategy Review: Stage 2 Study. It identified sites for new food stores in Bletchley and Newport Pagnell. It highlighted that policies for CMK were likely to be revised significantly in DV2, once work on the CMK and Campbell Park Development Framework documents had been concluded. It sought to retain village shops and post offices and make provision for new local centres.

5.5 DV1 also redefined the retail hierarchy within the Borough. Bletchley was defined as the second centre (after CMK), reflecting its status as the second best activity node and the significant development opportunities within the town. The older town centres were given a higher status than the new district centres of Kingston and Westcroft. This reflected advice in RSR2, the wider range of facilities and services in the older town centres (in line with PPG6 Annex A and the importance attached by the Council to regenerating the older town centres).

5.6 The revised hierarchy is as follows:

- Village shops and local centres (Policies VS1, VS2 and LC1 - LC3)
- Kingston and Westcroft district centres (DC1 & DC2)
- Olney, Stony Stratford, Woburn Sands, Newport Pagnell and Wolverton town centres (TC1 – TC13).
- Bletchley town centre (TC14 – TC17)
- Central Milton Keynes (CC1 – CC9)

5.7 DV1 also contains general retail and town centre policies, dealing with Housing in Town and Other Centres (TC19), the assessment of major retail proposals (R1), retail warehousing (R2) and specialist categories of retailing (R3 - R6).

Second Deposit Plan (CD 2.1)

5.8 The main changes at DV2 stage were as follows:

- The deletion of the preferred site for a new food store in Newport Pagnell town centre (Policy TC9 and Site NP7) following the granting of planning permission for a new food store at 77 High Street (since completed).
- Revisions to policies and text relating to the Safeway store at Westcroft and the Tesco store at Wolverton (DC3 and TC12 respectively). In both cases the revised policies state that the Council will not permit further

expansion of these stores unless it is satisfied that there is a need for the development, and it would not adversely affect the vitality and viability of any other town or district centre or the Council's strategy for the improvement of those centres.

- Revisions to the text (para 3.40) to the strategic policy for Bletchley town centre (Policy S6) emphasising Bletchley's role in catering for its catchment area and complementing rather than competing directly with CMK.
- Additionally, Policy TC15 and text was revised to refer to an integrated mixed-use development, including a large new food store in Bletchley, on Site MK8. The site was also extended to include land north of Stephenson House, currently occupied by Kwik Save and Burger King.
- Changes to Table TC1 accompanying Policy TC18 in respect of Wolverton Town centre, to extending the primary area within which restrictions on non-retail uses apply.
- A major redrafting of the CMK policies following publication of the CMK Development Framework, now incorporating Campbell Park (CD 5.3). MKC has since approved the Development Framework as SPG, and this has been followed by draft SPG on Planning Obligations in CMK (CD 17.1).
- Changes to Policy R1 on the criteria used to assess major retail proposals, to improve consistency with PPG6 and to clarify that it is intended to apply to all new major retail development proposals.
- Changes to Policy R2 on retail warehousing (see below).

5.9 Changes were also made to the supporting text (paras 12.6, 12.62 and 12.63) in response to representations by DTZ (on behalf of 'the centre:mk') together with advice from CBHP. These changes reflected analysis of up-to-date survey information relating to the capacity of the MK catchment area to support additional retail development. This text will need to be further updated in view of the approval (subject to a Section 106 legal agreement) of the major extension to 'the centre:mk'.

5.10 In analysing data submitted by DTZ, CBHP concluded that there would be capacity to support about 10,000 sq. m gross of additional (largely comparison) floorspace in CMK by 2005, followed by phased growth to a total of 30,000 sq.m by 2011. This quantity of new floorspace was less than DTZ were seeking, which was about 18,500 sq.m gross in 2005 and 39,000 sq.m by 2011.

5.11 CBHP recommended that their retail capacity forecasts should be further updated after allowing time for shopping patterns to settle down following the opening of Midsummer Place and Xscape in 2000.

6 Key issues raised by objectors

6.1 Policy R2 makes insufficient provision for non-food retail warehousing. Additional sites for retail warehouses should be identified.

6.2 Kingston and Westcroft should have the same status in the retail hierarchy as the older town centres.

6.3 Wolverton should have the same status as Bletchley.

6.4 Areas of retail warehousing, such as Rooksley, should be included in the retail hierarchy at the same level as Kingston and Westcroft.

6.5 Policies preventing retail development on employment land are too restrictive.

6.6 A number of omission sites were proposed by objectors, mostly for additional retail warehousing at Rooksley and Winterhill (see Appendix 3)

7 Views of other organisations

7.1 GOSE had no objections to the policies in the Town Centres and Shopping chapter.

7.2 EP supports the development of Bletchley as the second major commercial centre of MK.

8 The Council's response

8.1 **Insufficient provision for retail warehousing.** Policy R2 is based on work originally carried out as part of the RSR2 study in 1999. This concluded that there would be insufficient expenditure to support additional new retail warehousing floorspace, over and above existing commitments, until about 2006 for the following reasons:

- There is a substantial amount of retail warehousing in the City, much of which is under trading.
- There is already capacity for additional retail warehousing at Winterhill

8.2 However, as stated above (para 4.12), CBHP's most recent advice is that there is currently an oversupply of general non-food retail warehouses, with 3 vacant units totalling 3,670 sq metres at 1 April 2003, and that existing retail warehouses as a group are currently under trading.

8.3 In addition, about 3,300 sq.m of new retail warehousing is currently under construction at the Mailcom site Snowdon Drive, Winterhill and about 3,000 sq.m of other floorspace has planning permission but has not yet been started.

8.4 Given this level of provision, CBHP forecast that there is no capacity for any additional general non-food retail warehouse floorspace (other than DIY stores) until about 2007. There is therefore no need to allocate any additional sites for non-food retail warehousing at present.

8.5 In terms of DIY retail warehouses, the CBHP forecasts suggest that there would be capacity for a new B&Q Warehouse store at Rooksley, and a larger Homebase store at Winterhill by about 2008. If these two new stores opened before 2008, there would be some risk to the existing stores, and/or the new B&Q and Homebase stores would take a few years to reach their full trading potential. The CBHP analysis suggests that there may be capacity for 1 new DIY goods store before 2006. The Council will be considering these applications later this year, in the light of these forecasts.

8.6 **Retail hierarchy: Kingston and Westcroft.** Although these 2 centres are grouped with the older town centres in the Structure Plan hierarchy, that plan was adopted in March 1996 and therefore pre-dates PPG6 (June 1996).

8.7 The status of the older town centres in the Borough accords with PPG6 and reflects the much wider range of town centre services and facilities that they offer compared to the new district centres of Kingston and Westcroft.

8.8 In RSR2, CBHP acknowledged the important role of Kingston and Westcroft in meeting shopping needs in the East and West Flanks of the City. However, these planned centres are more typical of district centres as defined in PPG6 (Annex A.) In RSR2 (para 7.20), CBHP felt that Kingston and Westcroft should not displace the role of the older town centres in the city, which could undermine initiatives in those centres to consolidate their role in the retail hierarchy. CBHP also supported the inclusion of a wider range of town centre uses and community facilities in Kingston and Westcroft consistent with their function as district centres and this is reflected in Policies DC1 and DC2.

8.9 **Retail hierarchy: Wolverton.** The Local Plan Panel considered this issue in May 2001 (CD 19.7). The difference in status between Bletchley and Wolverton does not imply a downgrading of Wolverton. It recognises that Bletchley is a larger shopping centre than Wolverton - in terms of the number of shops, annual turnover, trade draw area etc - and has the potential to develop as the second centre in the Borough after CMK as a result of East / West Rail, Bletchley Park proposals etc.

8.10 The status of Wolverton as a town centre is consistent with the definition in PPG6. The definition of Wolverton as a town rather than a district centre (as it is designated in the Adopted Local Plan) represents an upgrading rather than downgrading of its status to reflect its wider range of facilities compared to the new district centres at Kingston and Westcroft.

8.11 **Retail hierarchy: retail warehousing**. Areas such as Rooksley and Winterhill are less accessible by means of transport other than the car than either Kingston or Westcroft district centres, with much less potential for linked trips. They do not meet the definition of district centres as set out in PPG6 Annex A.

8.12 **Retailing on employment land**. This issue is also addressed in the Employment Topic Paper (CD 1.5). PPG6 states that retail proposals should not be permitted on land designated for other uses. The Council’s view is that there is no need to allocate more employment land for retailing – or to allow retail development on employment land other than in accordance with Policy E7 - because sufficient provision has been made elsewhere for retail development.

8.13 **Omission sites**. The Council will deal with these in site-specific proofs of evidence and / or responses to written representations

9 Pre Inquiry Changes

9.1 **PIC/28 and 29: Policy CC12 and para 12.78p re new food store provision in CMK** These changes identify a site for an integrated mixed-use development, including a large new food store at Block C4.1 in the Sustainable Residential Quarter in CMK. As a consequence of this change to Policy CC12, there are also amendments to Policy CC1, para 12.64, Policy CC13 and para 12.78w. (PICs 26,27, 30 and 31)

10 Conclusions

10.1 The Council believes that the Local Plan, with its defined retail hierarchy and comprehensive range of policies covering village shops and local centres to the city centre, provides a robust development strategy and approach to dealing retail development over the plan period.

10.2 The development strategy in the plan complies with government advice including PPG6 and the Structure Plan. The Council has sought to identify the future retail needs of the MKC area and provide for those needs over the plan period, while recognising the dynamic nature of retailing.

10.3 Where a need for additional floorspace has been identified, the Council has made provision by identifying sites and locations for development. In line with the sequential approach in PPG6, the plan seeks to sustain and enhance the vitality and viability of town centres by focusing retail and other key town centre uses within those centres. In focusing development in town centres the Council is seeking to promote sustainable development by locating major generators of travel in existing centres, access by range of transport not just the car.

10.4 Within MK, new shopping facilities have been phased and provided in a co-ordinated manner, linked to the population growth of the City. During the course of Local Plan preparation, the Council has commissioned regular reviews of the retail strategy for the Borough and responded to the latest forecasts of retail spending and capacity.

10.5 The approach of the Council to new retail development is plan-led, promoting retail development within CMK and other town centres, including new food stores in Newport Pagnell and Bletchley, and resisting new development in less accessible locations.

10.6 As the largest new town in the UK and fastest growing local authority area in the country, Milton Keynes is unique. As was acknowledged in the Directions Paper retailing is a very dynamic activity where things can change very quickly and there are strong development pressures within MKC area. In these circumstances the need for a robust development strategy is both necessary and desirable, so investors can plan with confidence for the future.

Appendices

Appendix 1: Glossary

Comparison goods: goods brought on an occasional basis for long-term use sometimes known as durable goods, for which people shop around to compare price, quality and style. Examples include clothing, furniture and electrical goods.

Convenience goods: goods brought on a regular and frequent basis for daily consumption - mainly food and drink, but also newspapers, magazines, tobacco and sweets.

District centres: groups of shops, separate from the town centre, usually containing at least one food supermarket, or superstore, and non-retail services such as banks, building societies and restaurants (PPG6 Annex A)

Out-of-centre: A location that is clearly separate from a town centre, but not necessarily outside the urban area (PPG6 Annex A)

Retail warehouses: Large single level stores specialising in the sale of household goods (such as carpets, furniture, and electrical goods) and bulky DIY items, catering mainly for car-borne customers and often in out-of-centre locations (PPG6 Annex A)

Sequential approach (to the selection of sites for retail, employment and leisure development and other key town centre uses): under the government's sequential approach in PPG6, where there is a need for further development, the first preference should be sites in the town centre (or other centres), followed by edge-of-centre sites (defined in terms of easy walking distance), and then out-of-centre sites in locations which are well served by a choice of means of transport.

The sequential approach is regarded by the government as a major step in promoting planning policies that will produce more sustainable patterns of development.

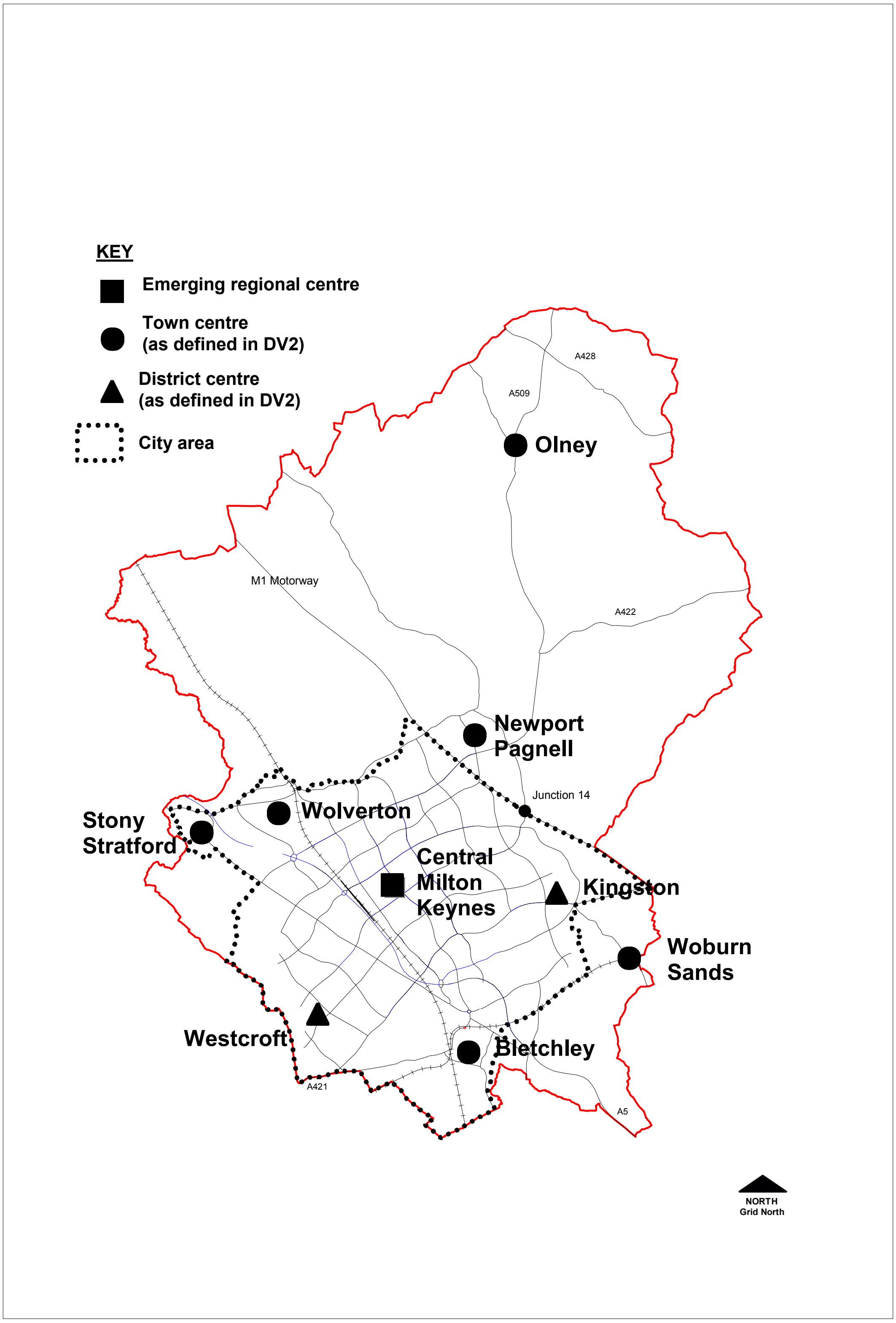
Supermarkets: single-level, self-service stores selling mainly food with a trading floorspace less than 2,500 square metres, often with car parking (PPG6 Annex A)

Superstores: single-level, self-service stores selling mainly food or food and non-food goods, usually with more than 2,500 square metres trading floorspace, with supporting car parking (PPG6 Annex A)

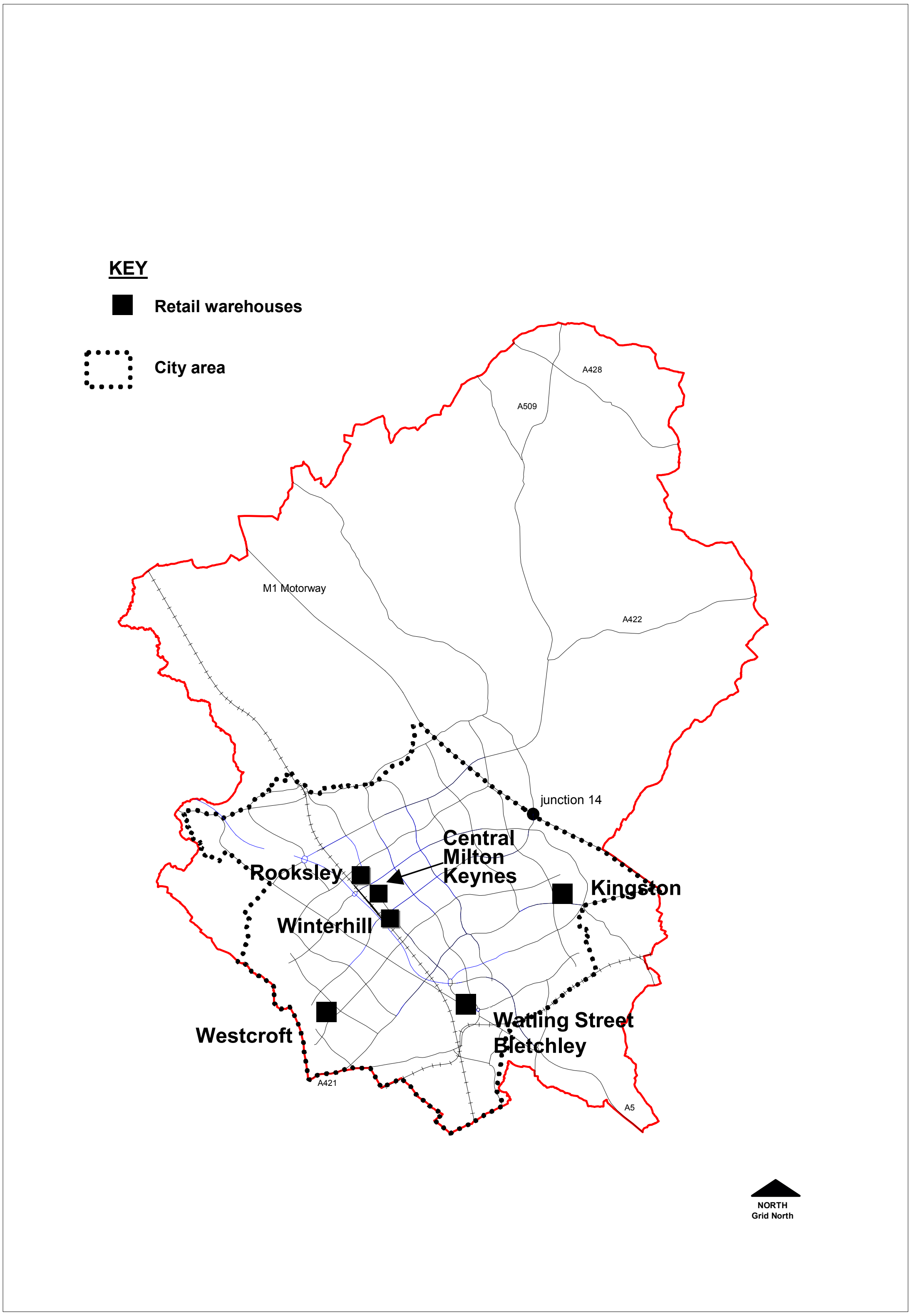
Town centre: in PPG6 the term 'town centre' is used to cover city, town and traditional suburban centres, which provide a board range of facilities and services and which act as a focus for both the community and for public transport. It excludes small parades of shops of purely local significance.

Appendix 2

Map 1: Main Shopping Centres in Milton Keynes Borough



Map 2: Main retail warehousing locations in Milton Keynes Borough



Appendix 3: 'Omission Sites' proposed by objectors for retail development

Obj No	*Location*	*Area (ha)*
TCS/947/3 & 9	Olney: land at Cowper Tannery / adj town centre (food store as part of mixed use development)	2.1
TCS/882/4	Rooksley: Precedent Drive (adj H4 / V6) (retail warehousing)	1.7
TCS/314/1	Stantonbury: land at Stantonbury Campus adj H3/V7 (relocation of existing local centre)	2.5
TCS/1041/1	Winterhill: Morgana site, Grampian Gate / Snowdon Drive (retail warehousing)	0.6
TCS/1095/1	Winterhill: bus depot, Snowdon Drive (proposed commercial … and other shopping)	2.1
TCS/1149/2	Winterhill: all land allocated for employment in grid square (retail development)	14.0