

# Enterprise and Business Committee Inquiry into Town Centre Regeneration

## Evidence from the Cardiff Council's Planning Service

Please find below, the considered response of Cardiff Council's Planning Service. Whilst we have attempted to address each of the points raised in the initial consultation, there remains some uncertainty as to the exact scope of the study and the specific areas for investigation. Please note also that these comments are given from the perspective of planning professionals working in a regulatory, policy making and regeneration environment, and do not necessarily capture the views of the wider council either from the operational or the political perspective.

Cardiff city centre sits at the head of the regional retail hierarchy and has the largest catchment area of any retail centre in Wales. It should also be noted that Cardiff also contains 11 District Centres and 77 smaller Local and Neighbourhood Centres; the scale of which in some cases may be comparable to other town centres within the Principality. The comments below have been provided within the context of both city centre and district/local centres. We have attempted to identify roles, recurring themes, planning policy issues and areas for further discussion and consideration by the Inquiry.

Should you require additional information or clarification of any of the points raised, please contact Mr. Phil Williams, Operational Manager (Strategic Planning and Development Management).

### **1. Role of Local Authorities.**

Cardiff Council performs the following roles:

- Strategic Leadership (eg. City Centre/District Centre Strategies/Out-of centre retail policy).
- Coordinator & facilitator (service areas/ext agencies such as police/community stakeholders)
- Regulator (development management/licensing)
- Funder (capital programme/Section 106 contributions/external grants)
- Land Owner (Venues/estates/disposals/leases)
- Developer (Regeneration and Renewal)
- Manager (Cleansing/Waste/Night-time Economy)
- Promoter (Marketing, Tourism and Events)

### **2. Business & Community Engagement.**

- Active involvement of community stakeholders is an essential part of regeneration.
- Local traders, with a few exceptions, are difficult to engage: understandably, their focus is on individual business profitability, rather than the collective well-being of centre.
- Capacity building – longer term support to develop partnerships/support traders' associations / 'buy-in' to the wider picture.
- Impact of business rates – small trader viability/incentivisation to occupy vacant units.
- Property ownership – absentee owners - lack of private investment & maintenance
- Unrealistic 'hope' values for future development may blight areas for regeneration in the current economic climate
- The predominance of leasehold interests and turnover of premises deny long term investment and sense of ownership
- A clear vision and strategy for the future of centres may support a partnership approach provided there are sufficient resources to deliver desired actions and outcomes
- Strong role for City Centre Managers and stakeholder groups/business forums etc.

### **3. Mix of Residential, Commercial and Retail.**

- Effectiveness of planning policies & controls (proliferation of A3 uses and displacement of independents by national multiples) can be seen as a disadvantage

- Potential changes to GPDO and UCO could promote vitality, viability and flexibility
- Encouraging diversity - scope for small business/enterprise use of surplus retail premises / community & leisure uses to reinforce role as neighbourhood hubs
- The contribution of the night-time economy to vitality and viability can be significant provided that it is well managed
- Vacant / underused upper floors – living over the shop etc. Cardiff's City Centre Living Project has proven to be very successful to reduce vacancies, increase urban density and create new urban communities

#### **4. Impact of Out-of-Centre.**

- Effectiveness of national and local retail policy – insufficient control over intensification of retail sheds originally consented for bulky goods. A seemingly straightforward and well established policy favouring town centres is still being played out at appeal and with inconsistency and high complexity of outcome.
- Aggressive strategies of retail multiples both in terms of out of centre stores and the increase of in-centre convenience store formats which, though compliant with policy, are often seen as more of a threat to local independents than out-of-centre without the policy framework to defend them?
- There is a recognition that large food stores (convenience) and 'bulky goods' (i.e. DIY) retail warehouses have a part to play in consumer demand, and are not always suited to city centre or district centres, but this is continually stretched and challenged as a result of inconsistent appeal decisions etc.
- "Ancillary" uses of non-bulky, comparison retail in large OOC stores can harm the vitality and viability of existing town and district centres and are difficult to control, monitor and enforce
- Perceived regeneration benefits should not outweigh out of centre retail policy (greater clarification needed)
- Potential to use CIL to improve existing centres should not be used as a policy justification for out of centre permissions

#### **5. Sustainable & Integrated Transport.**

- Accessibility to, and connectivity between centres, as well as within centres.
- Getting the balance right between car-borne and other modes – not one at expense of other.
- WAG funding to support sustainable transport initiatives for district centres?
- Commitment to investment in national/regional public transport infrastructure is required over a long time scale to embrace new technology and provide a viable alternative to private cars
- Inclusive design approaches – importance of engaging with disabled groups to fully understand barriers.
- Greater recognition needed that reliance on large format stores, where car access is the only practical option for customers, is fragile and unsustainable in light of the growing costs of private car ownership and other "peak oil" issues.

#### **6. Funding Sources / Financial Solutions.**

- Since end of the Physical Regeneration Fund, no WAG funding available outside Strategic Regeneration Areas. ERDF funding also geographically restricted.
- Strong commitment from Cardiff Council to invest in district & local centres - aligned with "sustainable neighbourhoods" agenda – but difficult because of capital programme constraints which may raise expectations.
- Opportunity to review business rates – scope for top slice (rather than top up) for regeneration of centres – would establish direct link between business tax and local benefit.
- Section 106 and future CIL – competing infrastructure demands on limited 'pot'.
- Potential for TIF and/or enterprise zones – although these may have conflicting priorities/mechanisms in terms of rate relief/future rateable values
- BID's – only viable if businesses can afford, supplement and deliver tangible benefits to trade - not an option in marginal/struggling centres. Potentially favoured by national multiples, being better placed to absorb addition costs or pass them on to the consumer?
- Local centres viewed as unattractive to private sector investment - financial viability, uncertainty, risk, multiplicity of ownerships, environmental quality.

#### **7. Impact of Marketing & Image.**

- USP (unique selling point) for individual centres – what makes them different from clone retail parks etc.

- Adaptation of centres to particular catchments (City Rd - students / Tudor St – ethnic groups / Cathedral Road – Pontcanna niche)
- Reluctance of local traders to engage in collective marketing of centre, as opposed to individual business promotion.
- Transformational impact of public realm improvements ( eg The Hayes/Clifton Street / Delta St)
- Addressing negative perceptions of centres as unsafe places (policing, licensing, surveillance, vitality after shopping hours etc).
- Linking retailing to Major events and tourism

## **8. Local Employment Opportunities.**

- Importance of city/district/local centres as source of employment in local communities (accessible jobs / flexible working (part-time) / but often low paid).
- Vocational skills training (construction, retail, hospitality, catering etc.) to maximise potential of local labour force

## **9. Evaluation of Success.**

- Longitudinal evaluation: pre-work / immediate post work / one year / 5 year – success may not be immediate, centres take time to adapt.
- Link to engagement: feedback from all groups involved in consultation process (traders / shoppers/ residents / other community stakeholders).
- Differential impacts: redesign of shopping environments may impact on passing trade, but encourage walk-in custom.
- Acceptance that regeneration may hasten process of retail change – aim not to protect struggling retailers which have limited long-term prospects.
- Resources to monitor and manage centres and undertake surveys (Vitality and Viability, land use/ vacancies, footfall, environmental audits, user perceptions etc.) to inform prioritisation
- Vacancy can be an indication of turnover to higher value uses/regeneration ‘uplift’ as well as decline

## **10. Other Issues:**

### **10.1 Centre Viability:**

- Strategic approach needed to determine whether all centres are worthy of regeneration / accepting decline and managing contraction may be better policy in some cases.
- Regional dimension is not addressed fully, particularly in SE Wales where there are large, competing centres for limited inward investment
- Distribution of (historic) centres in relation to urban growth (existing or planned) and shifting balance of population.
- Priorities for regeneration and investment – target worst-first? or target those that have greatest potential to succeed?
- Mix of uses and functions of centres including residential to promote sustainable urban communities with a range of complementary facilities to make centres less susceptible to economic conditions

### **10.2 Business Support**

- Targeted support for those setting up retail business/expanding existing businesses.
- High turn-over of shops reflective of low business acumen and/or knowledge of local retail markets
- Failure of traders to adapt to changing retail environment - contributes to lack of stability in centres.

### **10.3 Centre Management**

- Physical regeneration (capital investment) undermined by inadequate management/maintenance regimes.
- Successful centres which attract high intensity uses require high intensity maintenance.
- Current public sector financial stringencies do not allow for the enhanced revenue budgets needed to support better cleansing , policing, parking enforcement, addressing ‘wear and tear’, responsive repairs and tackling environmental misuse.

- Flexibility to invest commuted sums to cover lifetime costs.
- Role of dedicated centre managers to raise standards through locally based management and engagement.
- Potential for City/District Centre Strategies to prioritise actions and gain greater commitment from owners, businesses, stakeholders and users

#### 10.4 New Communities and new retail facilities

- Despite best endeavours of planning policy, the development industry is still poorly aligned to deliver truly sustainable new or expanded communities. Masterplan aspirations to support or create flexible and accessible shopping centres at the hubs of new or expanded residential communities are difficult to achieve when volume house builders and commercial developers are geared to develop independently and in “zoned” areas. Where a quantitative need for additional retail floorspace is identified as a result of new housing development, national retailers are almost always at an advantage in capitalising on this and the end result is usually a large, single car based store format rather than an incremental addition to an existing centre close by. National policy steers needs to be much clearer on this issue. (See diagram from “Designing Streets – A Policy Statement for Scotland”).



#### 10.5 Sustainable Development

- WG has placed sustainable development at the heart of its agenda for Wales. Diverse, thriving and accessible shopping centres, within easy and reach of broad population bases, and trading where possible in locally sourced products which sustain local rather than global economies and entrepreneurship can and should contribute to this agenda in a very powerful way. There is a real and exciting opportunity for the WG to grasp this agenda fully by:
  - Strengthening its Planning Policy commitment to sustaining and enhancing accessible and diverse shopping centres;
  - Taking bold steps to establish and clarify its opposition to car based retail locations;
  - Prioritising the resourcing of regeneration in centres that contribute to the sustainable neighbourhood agenda; and
  - Influencing the silos of the development industry to work in a much more collaborative manner.