

## RETAIL POLICY

**Policy CS4 and CS6:** We support the thrust of the policy and its intent, but question whether the policy will be able to deliver the strengthening of Havant town centre and its linkages with Central Retail Park and developments that support the centre or deliver the quantum of retail floorspace proposed over the plan period to 2016. In this respect the policy may not be soundly based.

While the acknowledgement of the role of Havant Town Centre as the principal centre within the Borough is welcomed, as is the commitment to the provision of 13,000m<sup>2</sup> of new comparison floorspace (at least 9,000m<sup>2</sup> of which is in the east, including Havant), it is considered that the policy does not place adequate emphasis on development of the identified floorspace within the hierarchy.

It should be noted that beyond 2016 additional floorspace is required and at present there is limited information of how this will be met, given the timescale of the Core Strategy and Development Delivery and Allocations DPD..

In this respect the role of Havant as the principal retail centre in the hierarchy risks being undermined if development comes forward in other centre under the terms of the policy that ought to be located within or near to Havant town centre, in support of its role. The role of retailing in each centre needs to reflect the role of that centre and Havant needs to compete with Portsmouth and other centres in the sub region that offer a wide range of goods and services. It is the centre which has the greatest accessibility and requires strengthening in terms of the quality and quantum of space in order to retain spend within the town and encourage more rounded retail shopping trips.

The policy at present does not reflect the significant investment made in the edge of centre retail parks and the important role played in supporting the role of the town centre and forming part of its retail offer. Central Retail Park in particular offers the potential for linked trips and is well located to the railway station and main bus station, providing a complimentary retail offer to the traditional centre.

The focus on policy CS4 in the absence of recognition of how the town centre of Havant has evolved in light of significant new investment, risks undermining this investment in the period until any boundaries are redefined in the Development Delivery and Allocations DPD, as there is a real risk that development may go to lower order centres or other locations.

While we recognise that the Development Delivery DPD is proposed to reconsider the town centre boundary within Havant (and elsewhere) and to consider new allocations to meet some or all of this demand, this does not assist the retention and development of these centres within the next 2-3 years until such time as that DPD is adopted. This would only leave the latter part of the period to 2016 for such provision to be made.

The Retail study undertaken by NLP identified that existing commitments would be fully utilised by 2011 and hence there will be a clear shortage of comparison retail space

significantly before the Development Delivery (Allocations) DPD is adopted, leaving a policy void that undermines the ability of Havant town centre and Central Retail Park to meet the challenge identified in the Core Strategy. The Study evidences the need for potential retailing outside the existing town centre, which has identified limited capacity and hence there is a clear requirement in the period 2010 to 2016 for new floorspace which by definition is going to be outside the town centre boundary. It is clearly preferable that this is directed to Havant if the hierarchy and PPS4 considerations are to be met, focussing new retail development in accessible town centre locations.

While we support the overall intentions therefore, the apparent disconnect between the aspirations and the delivery of these aspirations renders the approach potentially unsound and undermines the delivery of the Core Strategy's retail objectives. Applications in the interim may be considered on their merits and the likelihood is that land west of the town centre and the existing retail parks is likely to be preferred, but this should be expressly stated in the Core Strategy.

Policy CS6: Again, while we support the aims of the policy, to regenerate and enhance connectivity within and around Havant town centre, the policy fails to consider retailing within and around the centre as a whole, with no direct reference to the role of Central Retail Park in supporting the retail function of the centre, with good connectivity and the potential for linked trips enhancing in the overall retail offer.

It may be noted that the authority have consistently considered Central Retail Park, Solent Retail Park and Tesco as being key to the town centre retail offer in promoting its development and this should be reflected in an acknowledgement of its role in supporting the regeneration of Havant.

The role of the existing retail areas and their continued vitality should be expressly supported and referred to in considering the role of new areas or redevelopment of the public service village, railway station and other areas. The spatial connection between existing and proposed retail and town centre functions needs further thought, given the time gap between adoption of the core strategy and the Development Delivery DPD.

Unless this issue is recognised, the policy at present appears ineffective, unjustified and potentially at odds with PPS4.