
BMO Real Estate Partners LLP
Carlisle District Local Plan Examination
Hearing Statement
Matter 5 – Economy (Issue 2)
Respondent Number: 086

November 2015

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Project Ref:	25540
Status:	FINAL
Issue/Rev:	2
Date:	16 th November 2015
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Ref: 25540/A5/MH
Date: 16th November 2015

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1.0 INTRODUCTION

Background

- 1.1 This Statement has been prepared on behalf of Carlisle Shopping Centre Limited (Carlisle SC Ltd) represented by their asset managers BMO Real Estate Partners LLP ("BMO"), formerly known as F&C REIT Asset Management.
- 1.2 Carlisle Shopping Centre Limited is the long leasehold owner of The Lanes Shopping Centre ("The Lanes") in Carlisle City Centre.
- 1.3 Our clients has owned and operated The Lanes since December 2012. The Centre was originally built and opened in 1985 and is the purpose built Shopping Centre anchor for Carlisle City Centre providing 410,683 sq ft (38,153 sq m) covered shopping centre offering 78 shops, cafés and restaurants over a single trading mall level. The Centre is a key component of the City Centre's Primary Shopping Area ("PSA"). The Centre is also supported by a 625 space multi-storey car park accessed from Lowther Street which is the anchor car park for the wider City Centre. Lowther Street then links to the wider highway network.
- 1.4 The Lanes currently provides a wide range of retail and service floor space in circa 78 shop units including anchor stores for multiple retailers such as Debenhams and New Look. The Centre has a reasonably healthy occupancy rate and it has recently been announced that Primark will take over the BHS unit in 2016. This is a significant new letting for The Lanes and the City Centre, as it is a retailer that is not currently in the City / sub-region and is identified as offering a qualitative improvement to the comparison retail offer (see paragraph 8.25 of the GVA Carlisle Retail Study 2012 ("RLS") / CD EB012)).
- 1.5 The current layout and retail profile is also identified on the GOAD Plan of the City Centre provided at **Appendix 1**. The boundary of the Centre itself is identified in red. The Centre is popular and plays an integral role in the health and attraction of the City Centre to local residents, visitors and tourists.
- 1.6 There is the potential to extend the Centre eastwards to provide additional retail floorspace and larger units to offer significant qualitative improvements for the City Centre. The potential site for extension of the Centre is the Lowther Street car park which is identified on the **Appendix 1** Plan. BMO's emerging scheme has been shared

with Carlisle City Council (“CCC”) and is presented at **Appendix 2A** for information. This scheme has the potential to provide an additional 450,000 sqft (40,000 sq.m) gross of retail and leisure floorspace including a new comparison anchor store, larger and medium space units and a multiplex cinema complex with associated restaurants. The site is capable of delivery within 5 years and already benefits from a March 2015 Resolution to Grant Planning Permission (CCC Ref: 14/0849) for a 3,454 sq.m gross scheme promoted by the existing majority landowner (see **Appendix 2B**).

1.7 Whilst this is broadly positive, there are a number of threats to the medium / long-term health of the Centre and ability to provide future improvements. These include:

- Structural change in the retail occupier market caused by the recent economic recession and the growth of internet shopping, which has led to a reduction in the number of retail tenants and diminished floorspace requirements.
- Increased non-food / comparison goods sales in out-of-centre locations.

1.8 These threats are recognised in the Evidence Base to the Carlisle District Local Plan (“CDLP”) (see for example the RLS (CD Ref: EB012) paragraphs 2.6 and 10.16). A cautious and phased approach must therefore be taken to planning growth in the City Centre in order to protect existing stock and businesses. It is therefore essential that the CDLP protects and supports The Lanes and the policy primacy of the City Centre.

1.9 Carlisle SC Ltd supports the CDLP’s aim for the City Centre. Any development proposed in the CDLP should however be robustly justified and not planned at the potential expense of the health, attraction and function of the existing established City Centre retail pitch including The Lanes and English Street. This stance has been consistently stated through Carlisle SC Ltd’s representations to each stage of the CDLP’s preparation. Such representations were made by the owner’s asset managers under their former trading name of F&C REIT Asset Management Limited or BMO Real Estate Partners Limited.

2.0 CARLISLE SHOPPING CENTRE LIMITED'S CASE

- 2.1 Our case in relation to this Matter relates specifically to the CDLP's Retail and Town Centre uses strategy and the associated evidence base as presented in the RLS. This then specifically responds to Inspector's Questions 1-4.
- 2.2 BMO's representation to the Pre-Submission Version of the CDLP responded to a number of matters. BMO's case is now primarily concerned with the level and location of retail growth planned for the City Centre (see Inspector's Question 3). It is considered that the Retail strategy of the CDLP is currently unsound for the following reasons:
- **Justified:** the RLS Evidence Base capacity figure has been used incorrectly in the CDLP. The comparison floorspace requirement in Policy SP2 4.a and paragraph 3.24 should be reduced to reflect the correct RLS finding plus the current retail floorspace capacity position in the City Centre.
 - **Consistent with National Policy:** the RLS is not consistent with the NPPF and the PPG (see the 'Ensuring the Vitality of Town Centres section'). In this regard, the evidence base does not consider the impact of the proposed strategy on existing investment and the role of the City Centre (see PPG Paragraph: 015 Reference ID: 2b-015-20140306) as it promotes growth beyond the capacity identified in the RLS. A Phasing sequence for the provision of new City Centre floorspace should be provided in the absence of such an Assessment.
- 2.3 Our comments can be addressed via our proposed amendments to Policies SP 2 and SP 4 and linked supporting paragraphs. The rationale for this case is outlined in Section 3.

3.0 EXAMINATION ISSUES

3.1 Our case is outlined below with reference to the Inspector's Questions under Issue 2.

Question 1: Retail Impact Assessment Thresholds

3.2 We agree with CCC's Proposed Modification to the Thresholds. Should there be any further change / increase, we reserve the right to provide additional comments.

Question 2: Policy EC4 Morton District Centre Foodstore Allocation

3.3 We note the previously stated capacity figure of 8,175 sq.m gross has now been removed in CCC's Main Modifications to be replaced by reference to a "Foodstore Anchor". We support this Modification as the capacity figure related to a scheme of that size granted under a 2011 Outline Planning Permission rather than being identified in the RLS. The Permission has now expired so there is now no specific justification for the floorspace figure quoted.

3.4 As there is no identified floorspace capacity, there does however need to be amendment to Policy EC 4 to ensure that the convenience floorspace proposed under any Planning Application is justifiable under the established NPPF Impact test. An Impact Assessment will also enable the scale of any proposed Foodstore and other floorspace to be tested. We therefore recommend an amendment to Policy EC 4 as outlined at **Appendix 3**.

3.5 Under the RLS there is no justification for the sale of comparison goods capacity identified within the District Centre. This should instead be directed towards the City Centre. The District Centre is identified to fulfil a spatial deficiency in convenience goods provision in this part of the City. On this basis, there is no evidential justification to allow the sale of comparison goods from this location. Our proposed change to Policy EC 4 and its link with Policies EC 5 and EC 6 provide a basis to control this via a Planning Application.

Question 3: Policy SP 4 Further Expansion of the Primary Shopping Area

3.6 BMO continues to support the principle of Policy SP 4 and the potential future expansion of the PSA to 2030. This objective is positively planned and sets a clear basis for growth. It also complies with the NPPF requirement to protect and promote the City

Centre's vitality and viability plus setting it as the primary location for new retail development and investment.

- 3.7 Amendments to Policy SP 4 and associated supporting paragraphs are however required to ensure it conforms with the Evidence Base in terms of the timing of the capacity and protecting the health of the existing City Centre.

(a) Is the proposal justified by the evidence, particularly in relation to flooding?

- 3.8 Our evidence deals solely with the retail capacity evidence for the proposal.
- 3.9 The potential future expansion of the PSA is identified by the Evidence Base in the form of the RLS. The production of the RLS is consistent with the NPPF / PPG which requires LPAs to identify the retail capacity of their area within the Local Plan period. The overall proposal is then justified by a growth in comparison goods floorspace capacity during the Plan Period as identified by the RLS. The level and timing of City Centre capacity identified in Policy SP 4 is based on a misleading capacity finding in the RLS.

Comparison Goods Floorspace Capacity

- 3.10 The comparison floorspace target of 18,200 sq.m net is identified in the RLS (see specifically Appendix 3, Table 18A) based solely on comparison goods growth. There is however a significant over-estimate presented in Policy SP 4, as crucially the floorspace output in Table 18A does not allow for commitments.
- 3.11 Without a deduction for commitments, there is a misleading inflation of the potential floorspace capacity, as the calculation does not consider those commitments that will have been built and trading by that date and which would have otherwise absorbed the level of comparison goods growth upon which capacity is established. This over-estimate will place the health of a City Centre at risk, as there is potentially insufficient available expenditure to support the turnover of new floorspace.
- 3.12 The capacity position is more appropriately presented in Appendix 3, Table 18B which includes an allowance for commitments. This identifies a capacity of 11,478 sq.m net at 2030. It is this figure that should be presented as the 2030 floorspace target for the

CDLP and specifically Policy SP 4. We have recommended an amendment to Policies SP 2 and SP 4 and the supporting paragraphs in **Appendix 3** to reflect this.

Timing and Location of Retail Growth

3.13 There also needs to be to be a significant degree of caution applied to the timing and implementation of Policy SP 4 and the acceptance of the 11,478 sq.m net figure, to ensure it is consistent with the evidence presented in the RLS and the NPPF.

3.14 It is generally accepted that retail capacity forecasts are susceptible to change based on modified assumptions to inputs such as: expenditure / population change; floorspace turnover / efficiency; market share and commitments. This is readily apparent in the RLS which identifies a range of capacity figures depending on whether or not to maintain or increase market share; and to include commitments or not. With changing economic conditions, there is also the potential for the capacity position to alter again over the Plan period.

3.15 There is also the potential for commitments to be delivered in that Period which have the further effect of reducing capacity for floorspace. In this regard, since the RLS was published, the following key City Centre commitments have been approved by CCC:

- The Lanes: Planning Permission Ref: 14/0383 dated 14th July 2014 for additional A1 / A3 retail floorspace (+61 sq.m gross A1, excluding the A3 floorspace).
- The Lanes: Planning Permission Ref: 14/0965 dated 20th February 2015 for additional retail floorspace (+1,875 sq.m gross).
- The Lanes: Planning Permission Ref: 15/0093 dated 2nd April 2015 for modifications and an extension to provide additional retail floorspace (+ 735 sq.m gross).
- Eastern Side of Lowther Street Car Park: Planning Application Ref: 14/0849 resolved to approve subject to a S106 Agreement on 27th March 2015 for an additional 3,454 sq.m gross.

3.16 These commitments provide a total of 6,125 sq.m gross of additional commitments which are not taken into account by the RLS. A sensitivity test is presented at **Appendix 4** which illustrates the effect on the RLS Capacity figure when the commitments are introduced at 2014. This demonstrates negative capacity (i.e. no

- additional floorspace requirement) until 2021. Positive floorspace capacity only returns at 2030 and is reduced to 10,536 sq.m net, almost half of the current CDLP estimate. This assessment demonstrates the sensitivity of changes in only one assumption and the effect that recent commitments have had on the overall floorspace target.
- 3.17 If the current floorspace target is adopted, this will be inconsistent with the RLS and potentially places the health of the existing City Centre at risk, due to the over-inflated capacity figure it identifies. We recommend the adoption of 11,000 sq.m as 2030 floorspace target but one that needs to be kept under regular review. This is consistent with PPG advice which recommends a Town Centre Assessment should also be based on a three-five year period together with the lifetime of the Local Plan and be regularly reviewed (see PPG Town Centre section paragraph 004).
- 3.18 This sensitivity assessment has also demonstrated that there are already a number of commitments which provide the basis to accommodate the short-medium term growth identified originally in the RLS. In order to properly account for this growth, we recommend phasing and timing triggers are introduced into Policy SP 4 to prioritise the commitments. This will provide important guidance on when and where comparison retail floorspace is required in accordance with the RLS. The amendments are presented in **Appendix 3**.
- 3.19 Our proposed sequence provides priority to The Lanes and also large vacant units in the existing PSA such as the former Hoopers Department Store on Castle Street which provides over 40,000 sq ft (3,800 sqm). It also prioritises the Lowther Street Car Park site which represents the next most natural opportunity to grow retail floorspace and expand the PSA in accordance with the 2015 commitment and BMO's own aspirations for an extension to The Lanes.
- 3.20 Opportunities for additional growth outside of the PSA and within the wider Policy SP 4 land can then be explored post 2030 when the current commitments have been implemented. If land within this wider area is to be brought forward prior to 2030, then the impact of the proposed growth area must be tested in the Evidence Base. This will offer an understanding of whether bringing the allocations forward in advance of the identified capacity time horizons is sound in terms of the potential for a significant adverse impact on Carlisle City Centre. In the current absence of such an assessment, the provision of a sequencing strategy based on time horizons and locations is the most appropriate basis for a Retail Strategy.

- 3.21 Such an amendment would be consistent with PPG Town Centre section paragraph 004 which recommends that the timeframe for the provision of new retail floorspace is included in a Plan's Town Centre strategy.
- 3.22 If the current floorspace target is to be maintained this will support an unsustainable level of growth over and above the capacity target. This target can now only be justified via an Impact Assessment in accordance with the PPG as this will provide an understanding of whether additional floorspace can be justified beyond the identified need. As such an Assessment has not been provided in the Evidence Base our proposed amendment to Policy SP 2 will ensure soundness.

(b) What other reasonable alternative options were considered?

- 3.23 The Carlisle City Centre Development Framework (CD EB014) provides the basis of a Sequential Assessment in accordance with the NPPF / PPG to identify where the need can be accommodated.
- 3.24 The Framework presents an assessment of existing site opportunities within and on the edge / outside of the PSA to accommodate the identified capacity. We support the Framework's identification of the 'Area North of Lowther Street including Rickergate' as an appropriate basis for an expansion of the PSA to meet the identified need. The Framework also confirms that this cannot be accommodated in other potential PSA locations.
- 3.25 Based on our review of the Evidence Base and the present capacity position as outlined above, we do however disagree with the identification of the entire 'Area to the North of Lowther Street' as a basis for growth as this does not reflect the actual capacity position. As there is a recent and deliverable commitment to extend the PSA onto the Lowther Street Car Park, this represents the most sustainable area to support floorspace growth in the short-medium timescale of the Local Plan. Our proposed amendment to Policies SP 2 and 4 reflect the sequence that should be followed.
- 3.26 The Car Park site has the following clear benefits over the 'Area to the North':
- It is a logical extension to the PSA providing important direct integration with The Lanes and the existing MSCP to maintain pedestrian linkage and maintain an existing and established retail circuit, which will be on the same grade as the existing retail core rather than down an ever increasingly steep hill.

- The site can accommodate a new Anchor Store and modern retail units with an entertainment/leisure complex and restaurants.
- The site is deliverable within 3-5 years in a single phase.
- The delivery of the site does not require multiple and large scale relocations of existing uses.
- The site already benefits from a 2015 Resolution to Grant Planning Permission for an extension scheme. This can either be implemented as proposed or modified to reflect BMO's preferred scheme.

3.27 The Constraints on delivery of the Area to the North as identified in the Framework are much more significant and cannot be delivered in the short-medium term. We therefore recommend Policy SP 4 is amended to be consistent with our SP 2 recommendation (see **Appendix 3**).

Question 4: Policy SP4 Caldew Riverside

3.28 The Caldew Riverside Allocation represents a significant threat to the health of the City Centre and the ability to deliver sequentially preferable sites. Our observations on the capacity position demonstrate that floorspace growth in the City Centre should be prioritised and delivered within the PSA and appropriate areas of the SP 4 area.

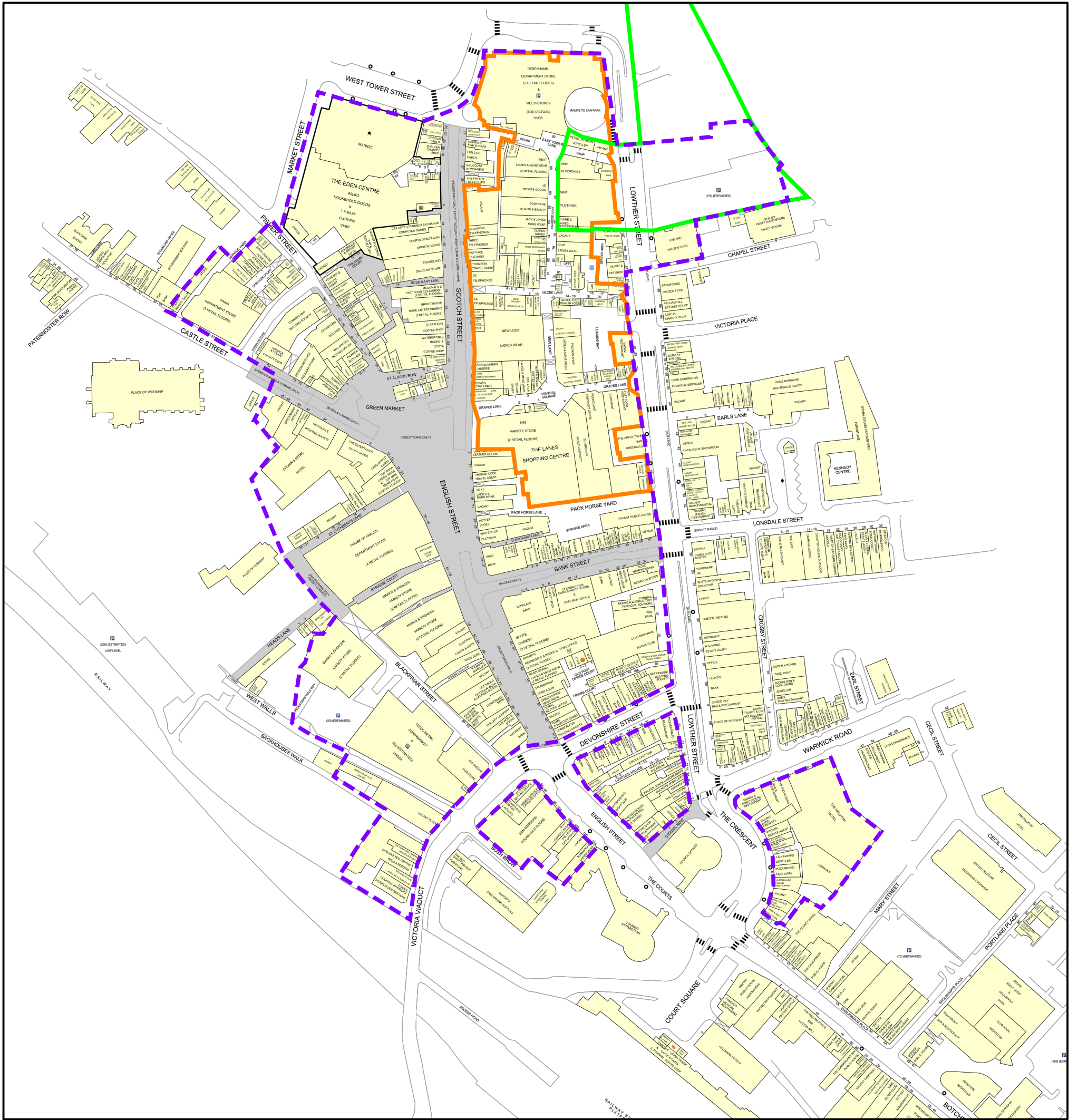
3.29 The site is divorced from the PSA by the significant change in topography and the location of the West Coast Main Train Line and its significant viaduct wall.

3.30 In the absence of any residual capacity, there is no justification in the RLS to allocate the site for any form or scale of retail development during the Plan Period. Policy SP 4 and the supporting paragraphs that relate to the site should either be deleted or amended to clearly state that retail floorspace will not be supported.

4.0 CONCLUSIONS AND RECOMMENDATIONS

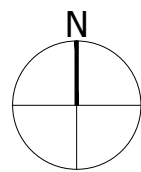
- 4.1 We have identified that the CDLP Retail and Town Centre Strategy is not consistent with the Evidence Base. Our own sensitivity assessment of the capacity forecasts identifies that the Lowther Street Car Park area should be prioritised as an extension to the PSA under an amendment to Policies SP 2 and 4.
- 4.2 We have also identified changes to Policies EC 4 and SP 4 to ensure these policies are sound and in accordance with the Evidence Base and NPPF. These recommendations are outlined in **Appendix 3**.
- 4.3 We reserve the right to provide additional observations once CCC has commented on the matters raised in this Statement.

APPENDIX 1
CARLISE CITY CENTRE GOAD PLAN



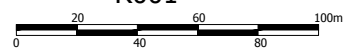
LEGEND

-  Primary Retail Area
-  Potential Site for Extension of the Centre
-  The Lanes Shopping Centre



Project
**The Lanes Shopping Centre,
 Carlisle**
 Drawing Title
Potential Extension Site Plan

Date	Scale	Drawn by	Check by
13.11.2015	1:2,500 @A3	ML	E-LS
Project No	Drawing No	Revision	
25540	R001	-	



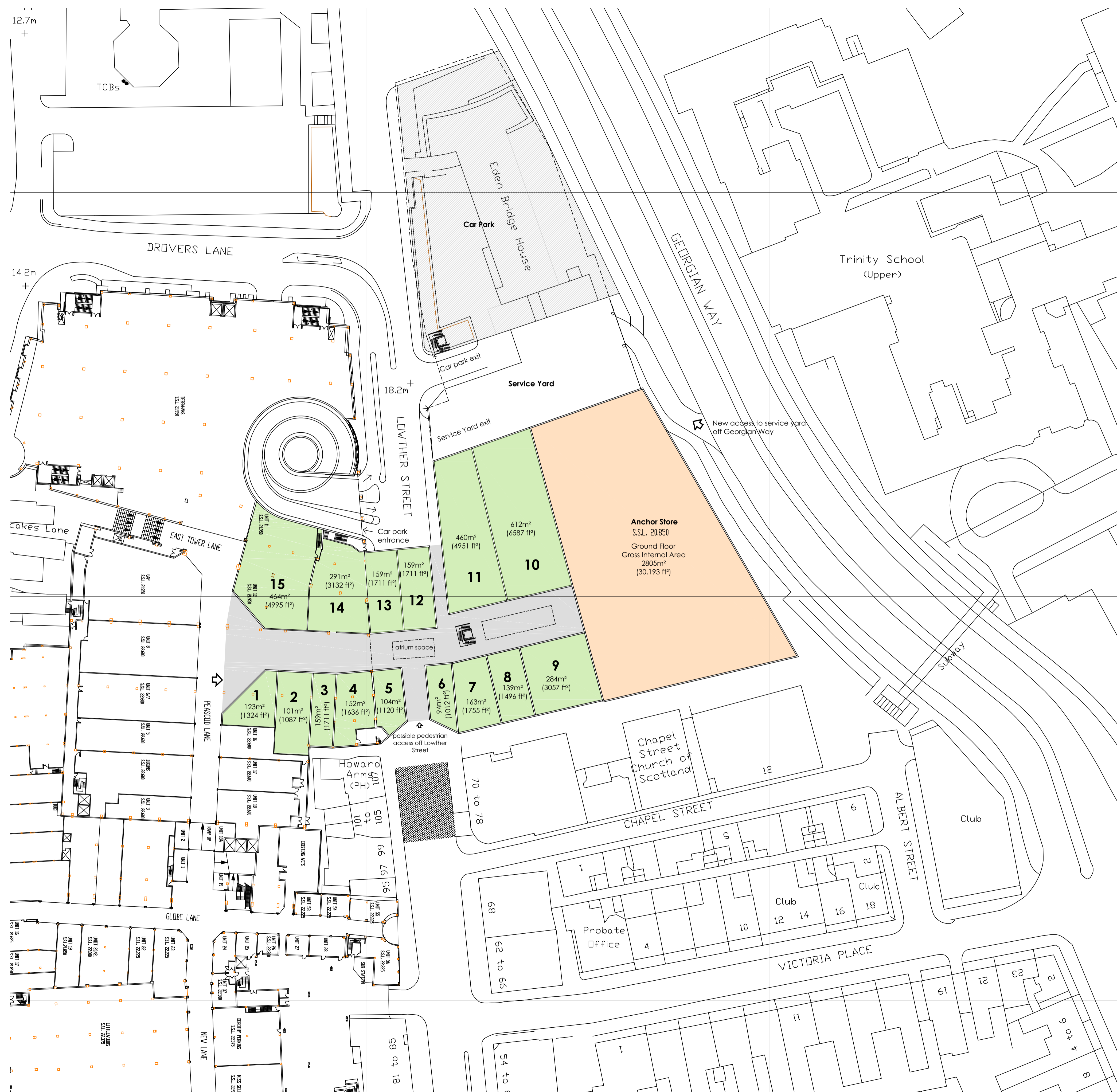
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APPENDIX 2
LOWTHER STREET CAR PARK SCHEME



Anchor Store

	Gross Internal Area	Structural Slab Level
Level 1	2805m² (30,193 ft²)	20.85
	1035m² - Service Yard	
Level 2	2805m² (30,193 ft²)	25.65
Level 3	2805m² (30,193 ft²)	30.45

Level 1	Gross Internal Area
Unit 1	123m² (1324 ft²)
Unit 2	101m² (1087 ft²)
Unit 3	159m² (1711 ft²)
Unit 4	152m² (1636 ft²)
Unit 5	104m² (1120 ft²)
Unit 6	94m² (1012 ft²)
Unit 7	163m² (1755 ft²)
Unit 8	139m² (1496 ft²)
Unit 9	284m² (3057 ft²)
Unit 10	612m² (6587 ft²)
Unit 11	460m² (4951 ft²)
Unit 12	159m² (1711 ft²)
Unit 13	159m² (1711 ft²)
Unit 14	291m² (3132 ft²)
Unit 15	464m² (4995 ft²)

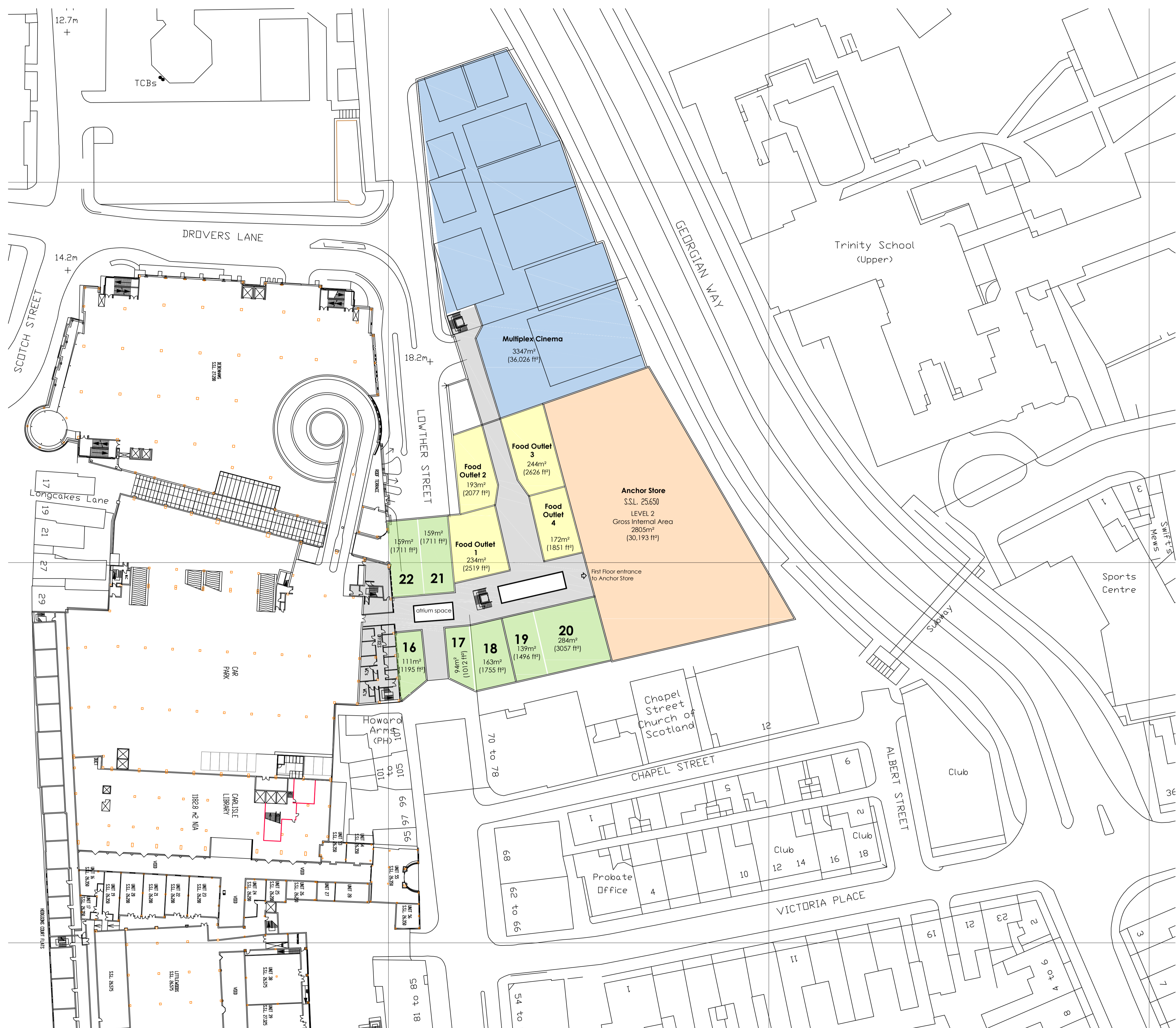
Level 2	Gross Internal Area
Unit 16	111m² (1195 ft²)
Unit 17	94m² (1012 ft²)
Unit 18	163m² (1755 ft²)
Unit 19	139m² (1496 ft²)
Unit 20	284m² (3057 ft²)
Unit 21	159m² (1711 ft²)
Unit 22	159m² (1711 ft²)
Food Outlet 1	234m² (2519 ft²)
Food Outlet 2	193m² (2077 ft²)
Food Outlet 3	244m² (2626 ft²)
Food Outlet 4	234m² (2519 ft²)
Multiplex Cinema	3347m² (36,026 ft²)

drawing based on previous CAD layout provided by the client and Ordnance Survey data, stated dimensions and areas have not been verified and are subject to confirmation by site survey

ARCHITECTS PLUS

Project
The Lanes Shopping Centre
 Carlisle
 Client
Carlisle Shopping Centre Ltd c/o F&C Reit
 Drawing
The Lanes - Phase 3
Level 1
 Scale Date Drawn Comp.No. Number
 1:500 18.11.13 CJ P05 13059-09

LEVEL 1 - FLOOR PLAN 1:500

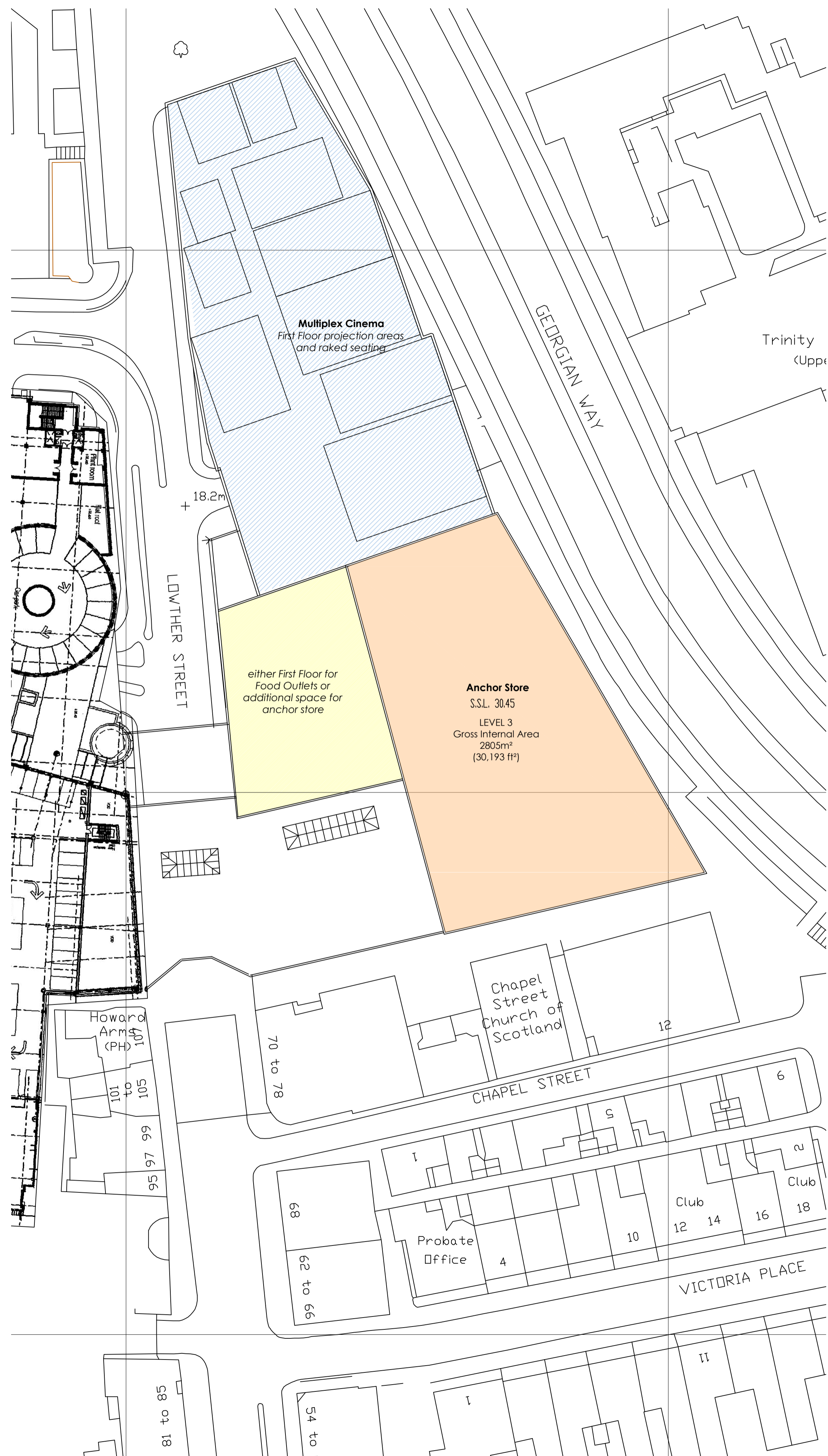


LEVEL 2 - FLOOR PLAN 1:500

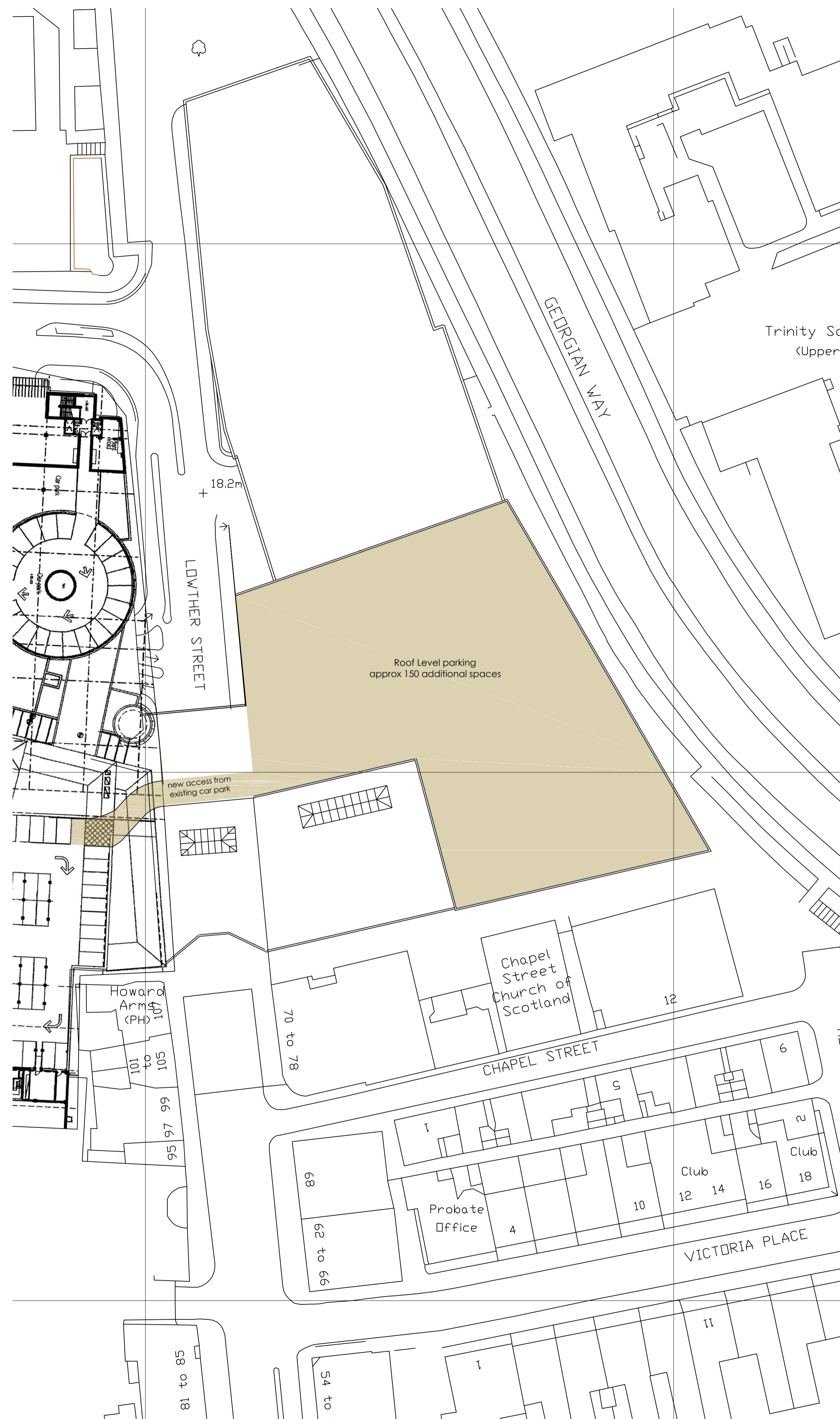
drawing based on previous CAD layout provided by the client and Ordnance Survey data, stated dimensions and areas have not been verified and are subject to confirmation by site survey

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Project
The Lanes Shopping Centre
 Carlisle
 Client
Carlisle Shopping Centre Ltd c/o F&C Reit
 Drawing
The Lanes - Phase 3
Level 2
 Scale Date Drawn Comp.No. Number
 1:500 18.11.13 CJ P05 13059-10



LEVEL 3 - FLOOR PLAN 1:500



LEVEL 4 - FLOOR PLAN 1:500

drawing based on previous CAD layout provided by the client and Ordnance Survey data. stated dimensions and areas have not been verified and are subject to confirmation by site survey

ARCHITECTS PLUS

Project
The Lanes Shopping Centre
 Carlisle
 Client
Carlisle Shopping Centre Ltd c/o F&C Reit
 Drawing
The Lanes - Phase 3
Levels 3 and 4

Scale	Date	Drawn	Comp.No.	Number
1:500	06.01.14	CJ	P05	13059-11

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General Notes.

Retail Space	1938.78 sqm	
Ground Floor	20869 sqft	
First Floor	1515.62 sqm	
	16314 sqft	
Total Retail Space	3454.40 sqm	
	37183 sqft	
Parking Spaces	Standard	Accessible
PL 1 & 2	27	
PL 3 & 4	38	4
PL 5 & 6	86	5
PL 7 & 8	86	5
PL 9	59	5

	296	19
Total	315	

application boundary —
 owned by applicant —

Site Area	4503.37 sqm
	48473.86 sq ft

Revisions:
 A. Additional parking levels added. [29.07.14] SM
 B. Planning Issue. [01.10.14] DMC
 C. Revised Planning Issue. [05.01.15] DMC
 D. Revised Plan - Access to car Park. [13.01.15] DMC
 E. Parking levels 10 & 11 removed. [23.01.15] DMC
 F. Parking spaces adjusted. [20.02.15] DMC

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**Mixed Use Development
 Lowther Street
 Carlisle**

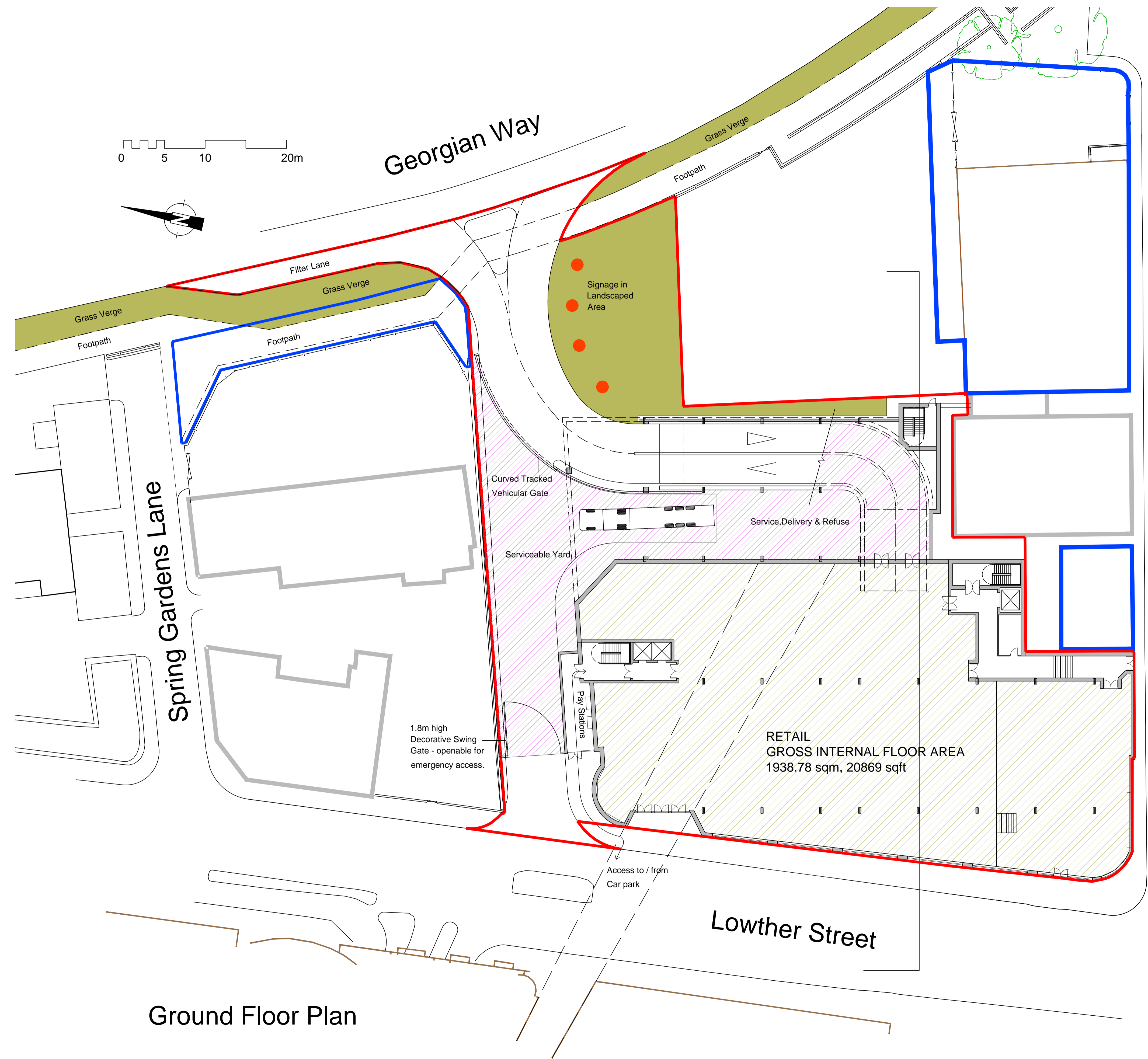
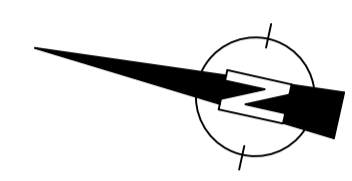
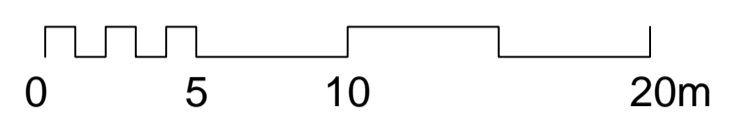
Proposed Floor Layouts

Planning

SCALE	DATE	DRAWN BY
1:250 A1 1:500 A3	JULY 2014	DMC

North Associates

13-40	PL	300F
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Ground Floor Plan

APPENDIX 3
RECOMMENDED POLICY AND SUPPORTING PARAGRAPHS

Carlisle District Local Plan Examination 2015 – Recommended Changes to Policies

For the reasons outlined in our Examination Hearing Statement, we recommend the following amendments to certain Policies in order for the CDLP to achieve soundness. Deletions are identified as ~~struck through text~~ and additional text is identified as **bold text**.

Policy EC 4 – Morton District Centre

Land is ~~allocated~~ **identified** at Morton for a District Centre to accommodate a Foodstore Anchor. **The size of the Foodstore Anchor and proposals for additional retail, leisure, local services and community facilities will only be supported within the District Centre providing they are of a scale and nature commensurate with its intended catchment and would aid its vitality and viability. Any Planning Application will need to be accompanied by a Retail Assessment to demonstrate the proposal's compliance with Policies EC 5 and EC 6.**

Policy SP 2 – Strategic Growth and Distribution

4. The City Centre will maintain and enhance its status by being the primary focus for further comparison retail developed across the Plan period:

*a. specifically, sufficient land will be identified within the City Centre to accommodate an additional ~~18,700~~ **11,000m²** net comparison retail floorspace until 2030. **The provision of this floorspace is to be phased as follows:***

*(i) **Between 2014-2025: within the existing PSA and the Lowther Street Car Park.***

*(ii) **Between 2026-2030: only once the PSA and Lowther Street Car Park commitments have been implemented, can proposals in the wider Policy SP 4 land be supported.***

Paragraph 3.24

*In order to maintain and enhance its status, and in accordance with national policy, the City Centre will be the primary focus for further comparison retail development across the plan period. Land has been identified through Policy SP 4 within the Local Plan, through a potential future expansion of the Primary Shopping Area, to accommodate up to an additional ~~18,700~~ **11,000m²** net Class A1 comparison (non-food) retail floorspace over the period to 2030, which is identified as necessary by the Carlisle Retail Study (2012). As with other key elements of the spatial strategy, the delivery and pipeline of additional comparison retail floorspace will be kept under regular review. **Due to the presence of existing commitments, growth in the short-medium term should be focused on the Lowther Street Car Park area. The managed growth of this area will protect the health of the City Centre. Due to the long-term capacity position, opportunities in the wider Policy SP 4 land should only be supported post 2026 and where commitments in the PSA and Lowther Street car park have been implemented. Any retail proposals prior to 2026 in this area will need to be fully justified by a Retail Assessment in accordance with the NPPF and Policy EC 6.***

Policy SP 4 – Carlisle City Centre and Caldew Riverside

*Land to the north of Lowther Street including Rickergate encompassing the Lowther Street Car Park has been identified for a potential future expansion of the Primary Shopping Area. Retail led development proposals within this area will be supported where they are in response to identified needs, are guided by a comprehensive strategy and where it can be demonstrated that the proposal would integrate effectively with the existing Primary Shopping Area. **In accordance with Policy SP 2, land to the north of Lowther Street can only be brought forward as a further future expansion of the Primary Shopping Area after 2026 and once the Lowther Street Car Park has been successfully implemented.***

Delete the penultimate paragraph relating to Caldew Riverside.

Paragraph 3.47

*The CCDF concludes that the most appropriate and logical expansion of the Primary Shopping Area within the City Centre would be to its north, on land to the north and east of Lowther Street. Accordingly, this area is also, which is also that where land availability is currently greatest and market interest strongest, has been identified on the Policies Map as a future extension of the Primary Shopping Area. **In accordance with the Evidence Base and Policy SP 2, the Lowther Street Car Park is to be the first phase of any expansion.** The extent of land identified reflects that a number of development options exist within this area, as evidenced through the CCDF and other private sector indicative proposals, through which the required development needs could be met. The identification of this land in this manner is considered to afford a strong degree of flexibility whilst at the same time providing a sufficient degree of certainty to aid investment decisions.*

Delete supporting paragraphs 3.52-3.53 relating to Caldew Riverside.

APPENDIX 4
COMPARISON GOODS CAPACITY SENSITIVITY ASSESSMENT

CARLISLE LOCAL PLAN - BW RETAIL CAPACITY SENSITIVITY**COMPARISON GOODS - FORECAST RETAIL CAPACITY FOR CARLISLE CITY AREA (CONSISTENT WITH RLS TABLE 18B)**

Study Years	2012	2014	2018	2021	2030
Survey Derived Catchment Expenditure (£)	373,562,818	392,849,866	442,155,985	483,155,783	630,408,709
Existing Net Comparison Floorspace	70,546	70,546	70,546	70,546	70,546
Sales per sq.m net (£)	5,295	5,455	5,836	6,139	7,144
Sales from existing floorspace (£)	373,562,818	384,853,754	411,698,741	433,054,342	504,000,507
CURRENT RESIDUAL (£)	0	7,996,112	30,457,244	50,101,441	126,408,202
COMMITMENTS (£)	36,028,622	55,118,622	55,118,622	55,118,622	55,118,622
RESIDUAL CAPACITY (£)	-36,028,622	-47,122,510	-24,661,378	-5,017,181	71,289,580
Sales per sq.m net in new shops (£)	5,000	5,166	5,527	5,813	6,766
Capacity for new shop floorspace (sq.m net)	-7,206	-9,122	-4,462	-863	10,536
Capacity for new shop floorspace (sq.m gross)	-10,294	-13,031	-6,374	-1,233	15,052

Notes:

1. Based on RLS Appendix 3 Table 18B updated to include post publication commitments. These are listed at paragraph 3.15 of the Statement.