

Report of the Director of City Strategy

Approach to Retail – Core Strategy Submission

Summary of Report

- 1 The purpose of this report is to shape the policy approach for retail to be taken forward in the Core Strategy. The paper should inform Members when making decisions on the overall retail strategy for York throughout the LDF period to 2029 to be taken forward within the submission draft of the Core Strategy. The approach to retail to be taken forward in the Core Strategy has been re-looked at by officers in light of the consultation responses received on the Core Strategy Preferred Options, the impact of the recession on the retail market and the change in policy context brought about by the introduction of 'Localism'. The report summarises the key messages set out in the Core Strategy Retail Topic Paper set out in annex 1 to this report. The purpose of the Topic Paper is as an evidence base to support the LDF.

Background

- 2 Grimley were instructed by the Council to undertake a Retail Assessment for York that would provide a context for retail policies and proposals within the Local Development Framework. It looked at the amount of floorspace that needs to be allocated for future retail development and set out a broad recommended strategy with which to implement this. This report was reported to Members of the LDF Working Group in June 2008 and subsequently published as part of the LDF evidence base. For the remainder of this report this will be referred to as the 'York Retail Study'.
3. Given its conclusions in respect of quantitative capacity for additional retail floorspace and the physical constraints in York City Centre to provide sufficient sites, it was necessary to commission an independent review of the retail development potential of edge of centre and out of centre locations, including the York Central site. GVA Grimley also carried out this work.
4. Following the initial results from the York Central retail work, GVA Grimley were instructed to undertake work to test a further more detailed retail development scenario for the York Central site presented by CBRE on behalf of Network Rail. This was in order to test a scheme, which was more specific in terms of tenant line-up and mix of unit size to allow for a more detailed and thorough

assessment of potential impact and to help in achieving the appropriate policy framework for York Northwest.

5. The findings of the York Retail Study, further Grimley work, and additional work undertaken by officers regarding the implications and wider policy issues on the approach to retail development are set out in the Core Strategy Retail Topic Paper (see Annex 1) and summarised in the remainder of this report.

Planning Policy Statement 4: Planning for Sustainable Economic Growth

6. The new PPS4 merges (amongst others) PPS4: Sustainable Economic Development with PPS6: Planning for Town Centres to consolidate national planning guidance on economic, retail and town centre development. It is against this guidance that our retail policies for the LDF must be framed and any proposed major retail allocations assessed. It outlines a process and series of tests for retail planning and assessment that essentially consist of four key elements:
 - **Identify need** first then begin the search for suitable sites to accommodate the identified need.
 - Apply the **sequential approach** to site selection,
 - Assess the **impact** of sites on existing centres
 - Also consider the degree to which **other considerations** such as regeneration benefits, employment benefits, increased investment and social inclusion may be material to the choice of appropriate locations for development.
7. In the remainder of this report we consider these key factors in recommending a suitable approach for retail in the Core Strategy.

(1) Identifying Need

8. In assessing need you should take into account a range of quantitative and qualitative factors. The findings from the various GVA retail studies indicate a clear need in York for additional retail floor space due to: future capacity projections for supportable additional floor space; a decline in York city centres market share and missing elements in York's shopping offer. We will look at each of these in turn.

Future capacity for additional retail floorspace

9. A key element in assessing need is to look at the future capacity projections for new retail floorspace and whether they are being met. The York Retail Study (2008) identifies sufficient capacity to support further comparison goods¹ floorspace in York city centre and the City of York area to 2029 by virtue of growth in population and available expenditure. The population growth is based on national forecasts for the catchment area (see Figure 1) based on trend line projections and the 2001 Census for small localised areas. Overall the population growth figure across the catchment area at the time of the study was forecast to grow by 8.5%.
10. 'Localism' has been a key feature of the newly formed Coalition Government. On the 20 May 2010 the Government published a document entitled 'The Coalition: Our programme for Government' setting out their policy programme. This commits the Government to implementing an agenda that is underpinned by the principles of localism providing for a 'fundamental shift of power from Westminster to people...giving new powers to local councils, communities, neighbourhoods and individuals'². For planning, this means pledges such as abolishing RSSs to return decision-making powers on housing growth and planning to local councils and reforming the planning system to give neighbourhoods more ability to determine the shape of places people live. The Queen's speech on 25th May 2010 introduced the Decentralisation and Localism Bill that will 'devolve greater powers to councils and neighbourhoods and give local communities control over housing and planning decisions'. The draft bill is likely to be published in Autumn 2010 and scheduled to be passed in November 2011.
11. The change in policy context, specifically the revocation of Regional Strategies, raises a number of questions relating to levels of growth and as a local planning authority, the level to which the council should set its strategic housing requirement and the links to employment growth. The impact of this change may be that the growth of the city in population terms may be lower than that forecast previously at a national and regional level and this in turn could impact on the level of expenditure growth that the catchment area would experience over the next 20 years and may in turn reduce the level of supportable additional retail floorspace. Due to this added uncertainty regarding population growth it is important that the Core Strategy policies include a degree of flexibility to allow for changes to growth projections and also to allow for changes and fluctuations in the retail market and people's levels of retail expenditure throughout the lifetime of the Plan.
12. Table 1 below sets out the additional capacity identified (sq. metres net) which varies depending on whether York city centre retains its current market share for comparison goods (28%) or seeks to increase its market share to 31% (scenario 1) and 34% (scenario 2) in order to 'claw back' expenditure lost in its catchment area since the 2001 Retail Study³.

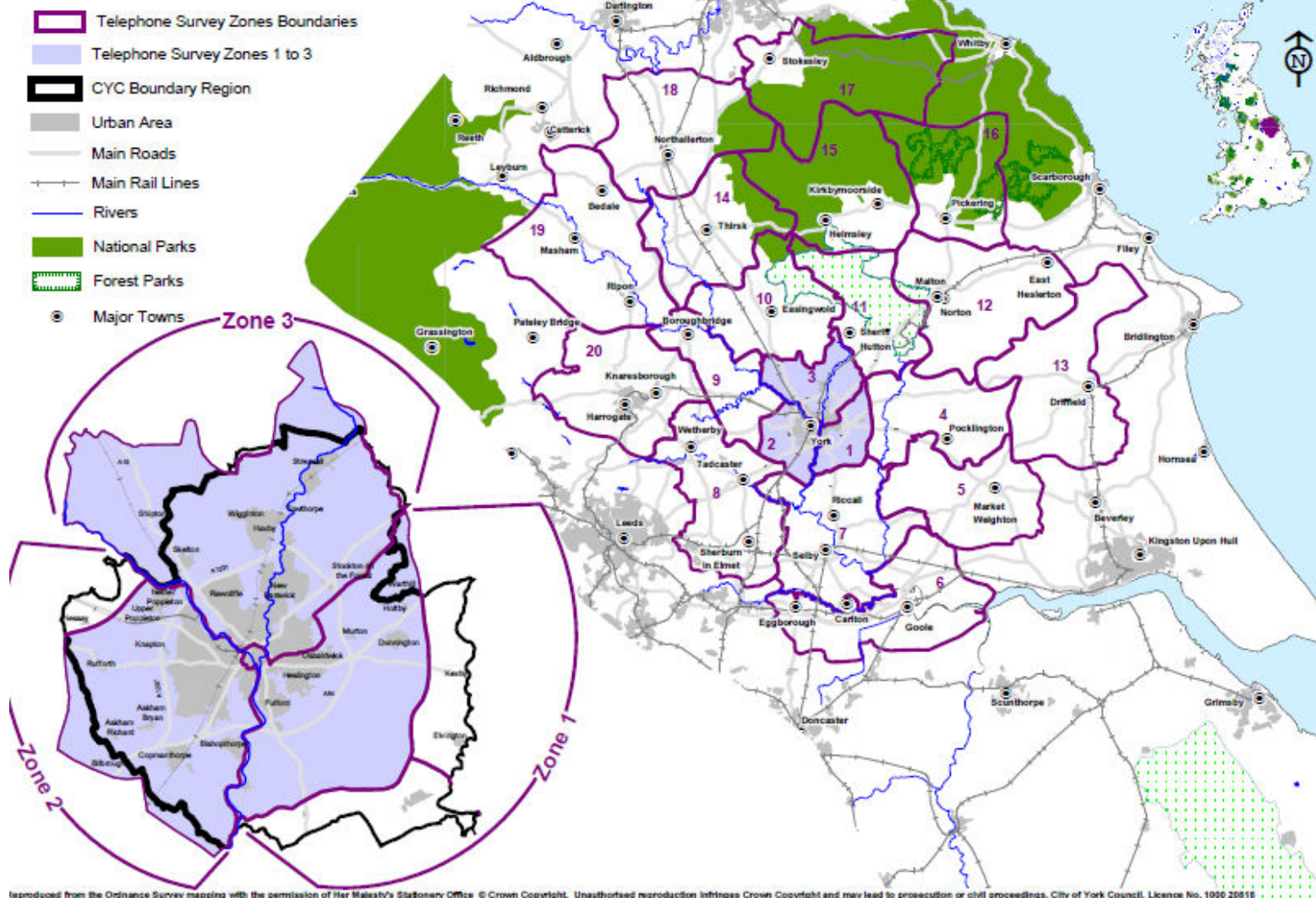
¹ Comparison retailing is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.

² The Coalition: Our Programme for Government, HM Government, May 2010, Page 11.

³ City of York Retail Study, CB Hillier Parker, 2001.

Figure 1: York Retail Study Catchment Area

Retail Telephone Survey Catchment Zones



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13. The study estimated that for the City of York area, depending on which market share scenario we chose to pursue, there would be potential capacity to support an additional:
- 31,361 – 35,127 sq m by 2017,
 - 56,524 – 62,907 sq m by 2022
 - 95,742 – 106,927 sq m by 2029.
14. The capacity for new development in all scenarios arises from the performance of both York City Centre and the out of centre retail destinations of Monks Cross, Clifton Moor and York Designer Outlet. The location and implementation of this capacity should be subject to the sequential test and impact test set out in PPS4, guided by York’s development opportunities and overall retail strategy for the LDF period. The Study states that the extent to which the Council should seek to ‘claw-back’ to the city centre central shopping area⁴ the potential spend in the catchment area is a policy choice to be made through the LDF process.

Table 1: Original Comparison Goods Capacity Forecasts (sq m net)

Scenario	2012	2017	2022	2029
Baseline scenario (28%)	9,245	31,361	56,254	95,742
Scenario 1 (31%)	9,562	32,768	58,859	100,190
Scenario 2 (34%)	10,418	35,127	62,907	106,927

Source: York Retail Study, GVA Grimley, 2008

The Impact of the Recession on Retail Growth

15. In light of the economic downturn there is clearly less growth in available expenditure within York’s catchment area compared to that forecasted in the York Retail Study. In that study a consistent growth rate of 3.8% per annum for comparison retail was used in the forecasts. Based on advice from national forecasters Grimley have updated the baseline capacity projection set out in the York Retail Study (2008). To reflect the current economic climate more cautious growth rates of 0.3% per annum in the period up to 2011 and 2.5% per annum in the period 2011 to 2016 have been used, followed by a more optimistic 4.6% ultra long term trend growth rate. This ultra long-term trend takes into account the ‘booms and busts’ between 1967-2007 and therefore provides a good indication for forecasting over a longer time period. Grimley consider this to be a balanced approach, incorporating conservative growth in the short term but factoring more optimistic growth in the longer term.

⁴ This performs the primary shopping role in the city centre with the strongest representation of national multiple retailers, most of which are located on Coney Street/Spurriergate and Parliament Street. This area benefits from strong national multiple retailers and leisure offer, high footfall and an attractive mix of buildings with a good pedestrian environment.

16. As a result, in the period from now up to 2022 the capacity figures in the update are lower than the previous study. Table 2 shows the revised baseline figures.

Table 2: Revised Comparison Goods Capacity Forecasts (sq m net) – Impact of recession on growth rates

Scenario	2012	2017	2022	2029
Revised Baseline scenario (28%)	5,491	23,731	56,348	106,664
Difference to original baseline scenario	-3,754	-7,624	+94	+10,922

The revised growth rates are 0.3% per annum 2008-2011, 2.5% p.a. 2011-2016 and 4.6% p.a. from 2016 onwards.

17. The evidence in the York Retail Study is based on a long-term view to 2029 within which fluctuations would be expected. Projections of future floorspace capacity are not specific targets for growth but aim to provide a broad guide based on the best information available at the time prepared. A future review of forecasts to take account of actual change is important and should be timed approximately every seven years.

Setting a Market Share Target for York

18. A number of conclusions from the York Retail Study indicate the need to meet the growing demand from retailers requiring larger modern retail units including the need to upgrade and enhance York's department store offer. It is crucial that such development is undertaken alongside protecting the historic built environment and the protection and enhancement of York's specialist independent retail sector.
19. At present, York City Centre retains around 28% of total available comparison goods expenditure with the catchment area. The remaining trade is being directed towards the competing out of centre shopping destinations within the City of York and to centres in the wider sub region. Market share has declined from 37% in 2001 to 31% in 2004 and 28% in 2008. GVA Grimley concluded that a 'no-development' scenario would only accelerate this decline over the LDF period.
20. It is evident from the Study that Monks Cross and Clifton Moor are taking a growing proportion of spend from the full spectrum of comparison goods categories including clothing and footwear. This has had a detrimental effect on the ability of York City Centre to retain its market share for these goods.
21. Major development proposals in Leeds, Hull, Darlington and Harrogate are likely to further enhance their market shares and the proportion of spend they capture from York's catchment area and also improve their positioning in the sub-regional retail hierarchy to the detriment of York's market share.

22. It is important for York City Centre to enhance and consolidate its role to prevent further market share decline in the context of strong out of centre retail development and increased competition from other centres. The risk is that without new investment in the city centre its market share could continue to erode as shoppers change their centre of preference.
23. A target was set in the Preferred Options Core Strategy to aim for a 34% market share for York City Centre with the aim to claw back market share, which is leaking, to other regional competitors. In terms of the Core Strategy Preferred Options consultation there was a range of view and opinions regarding the future growth of retailing in York.
24. Some respondents felt that seeking to increase the market share of York to 34% was too high in the current climate and that it would be unsustainable, at the expense of the historic buildings, lead to higher vacancies and issues of transport capacity. In addition they thought that an obsession with increasing market share can obscure the fact that failure to increase market share does not necessarily preclude the existence of a vibrant retail sector at current or slightly above existing levels, maximising particular attractions of the City without adverse environmental consequences.
25. Other respondents thought that a 34% market share target was too cautious and that we should aim for a higher market share of at least 37%. A higher market share was felt to be more appropriate because there are current inadequacies in retail provision in York, competition from other locations in the sub-region, it is more sustainable to achieve higher growth and trade retention and that we should be aiming to enhance York city centres position in the region.
25. The level to which York City Centre should seek to grow in the future should be underpinned by a requirement to maintain the city's historic identity, protect independent and specialist retailers, and enhance the quality of the built environment and public realm. This is crucial to maintain York's differentiation from competing centres. The overall objectives for the Core Strategy retail policies should be to enhance city centre food store provision and the role of York's market, maintain the range of specialist and independent retailers, introduce space for larger modern floor plates, protect the city's identity and embrace the historic fabric and built environment and ensure that any new development is of an appropriate scale and design to complement the existing city centre.
26. York City Centre serves a wide catchment area stretching beyond the city and uses that serve or depend for their vitality upon access to this catchment should be located here. It should have available a scale, range and quality of choices of goods. The City Centre should serve various needs including the provision of floorspace for large multiple and smaller independent retailers. A sufficient variety of shops and other services should form a concentration that draws people from its catchment area and away from competing city centres. This should ensure a strong and competitive city centre and support the wider economic potential of the city.

27. It is recommended that the Core Strategy Retail policies should no longer include an objective to increase York's market share to a set target of 34% and should instead be based on the need for York City Centre to remain vital and viable and to provide for local need rather than its relative performance against other centres. By focusing development and investment on the City Centre the market share will in turn increase as York becomes more competitive with competing retail destinations.

Qualitative need - the York City Centre Health Check

28. York has many strengths. It is an attractive and vibrant retail destination with a high quality urban environment and considerable historic and architectural heritage, which greatly benefits the tourism industry and attracts shoppers to York who are attracted by the unique environment. There is a good range of major mainstream multiple retailers in York, as well as numerous special interest, independent local shops that contribute greatly to the distinct individual character of the area and provides York has a differentiated retail offer helping it to compete more effectively with other centres in the sub-region.
29. However there are some key weaknesses that need to be addressed if York is to retain its strength as a retail centre. It is important that new modern retail space is introduced to attract a broader range and quality of multiple retailers to trade alongside and mutually benefit the already strong and unique attractor of the independent retail sector and to maintain strong footfall levels. The difficulty is that whilst the historic centre is one of York's key strengths it also presents physical barriers to expansion and the provision of large, modern floor plates. This lack of space has already encouraged a number of key retailers such as Debenhams and Next to offer larger range stores in out of centre locations.
30. There is clearly a need to provide additional retail space over the LDF period. The next step in the process is to determine where this should go. This is addressed in the next section.

(2) Applying the sequential approach to site selection

Why is protecting York City Centre important?

31. The city centre of York reflects a long and compelling heritage. It is instantly and internationally recognisable. The street pattern, buildings and spaces reflect this history and new development faces challenges to fit sensitively within this. As well as being the cultural hub, the city centre is also the economic and social heart of York. A successful York economy depends on a successful city centre. There are more than 30,000 jobs located in or immediately adjacent to the area which is also the focus of a tourism industry which attracts around 7 million visitors a year and acts as a gateway to other parts of the region. It also has a thriving and vibrant retail sector with a particular emphasis on independent shops.
32. In terms of place-making objectives it is important to ensure that the city centre is a thriving location for retailing, leisure, offices, culture and tourism to strengthen the

role of the city centre as the core of a sub-regional city. Growing the commercial heart of the city will help to ensure the long-term viability of York's economy and by developing a stronger retail offer will improve the vitality of the city centre.

33. Planning Policy Statement 1⁵ sets out the Government's overarching objectives for the delivery of sustainable development through the planning system, namely that planning should facilitate and promote sustainable and inclusive patterns of urban development ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities. It states that local planning authorities should through their spatial plans focus developments that attract a large number of people, especially retail, leisure and office development in existing centres to promote their vitality and viability, social inclusion and more sustainable patterns of development.
34. Planning Policy Statement 4⁶ states that local planning authorities should use a 'sequential approach' in selecting sites for new retail development. The focus should be for city centre sites first, then edge of centre sites before out of centre sites are considered. The 'sequential test' findings from the retail study are set out below.

What capacity for future retail development is there within the existing City Centre?

35. The York Retail Study identified and assessed the potential of a number of development opportunity sites both within and adjoining the Central Shopping Area (CSA) - see Figure 2. The only realistic opportunities identified for additional floorspace (net) within the CSA were:
 - Castle Piccadilly - around 24,000 sq.m
 - Stonebow House - around 1,100 sq.m
 - Telephone Exchange – around 2,800 sq.m
36. On this basis, Grimley identified physical capacity within and adjoining the CSA to accommodate around 28,000 sq m net of comparison goods retail floorspace over the LDF period. This figure is slightly higher than the identified capacity at 2017 of 23,731 sq m net (Revised baseline scenario – existing market share). At 2022 there is identified capacity of 56,348 sq m in the baseline scenario. This would leave a potential residual capacity of 28,408 sq m net of comparison goods floorspace, which can't be delivered, within the sequentially preferable CSA. Grimley concluded in the York Retail Study therefore that it would be appropriate to look beyond the CSA in order to meet the identified need over the LDF period.
37. GVA Grimley concluded in the Retail Study (2008) that it would be appropriate to look beyond the CSA in order to meet the identified need over the remainder

⁵ PPS1: Delivering Sustainable Development (2005), CLG

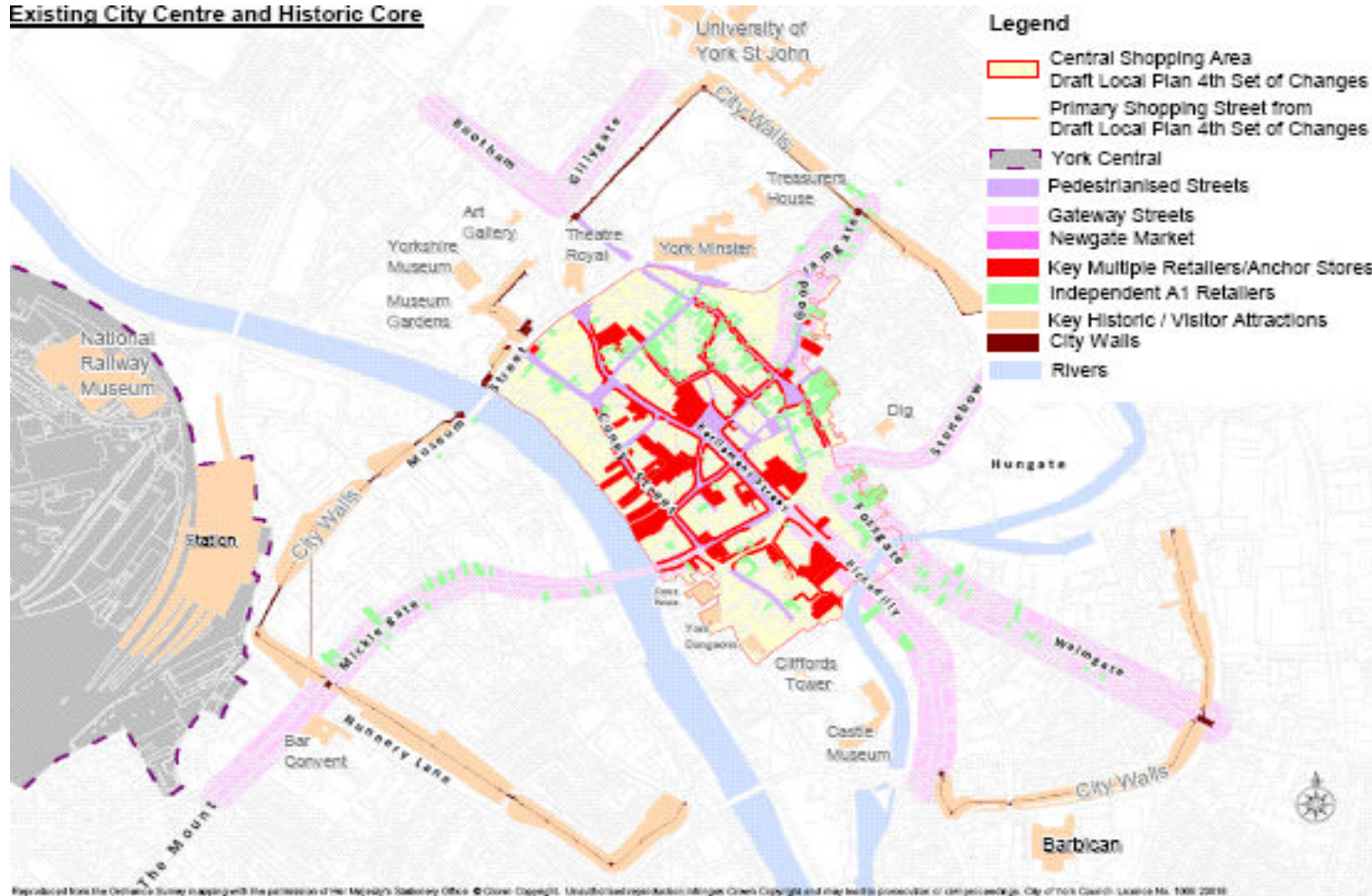
⁶ PPS4: Planning for Sustainable Economic Growth (2009)

of the LDF period. York Central was identified as the next sequentially preferable site beyond the CSA. York Central is sequentially preferable to other retail concentrations elsewhere in York beyond the urban area, notably Monks Cross and Clifton Moor, which are located in out-of-town locations further removed from the centre and have much less likelihood of forming links with the centre.

38. The York Central site is within the wider York City Centre area (see Figure 2) and has the highest likelihood of forming links with the existing central shopping area. The York Central site scores well with its location next to the main York Railway Station and its close proximity to existing bus services, together with the ability to provide pedestrian and cycle links to existing and new residential areas ensuring that the site would be well served by sustainable transport. The site is also sufficiently close to the central shopping area (approx 500m) for it to be well linked through improved pedestrian and cycle links. It is important to note that the out-of-centre policy position of York Central is based on distance from the CSA and the ability of connectivity is determined primarily on current land uses. It is clear that York City Centre has a tightly constrained historic physical environment with little or no room for further expansion. Future development options and the overall spatial strategy being developed through the LDF is aimed at being visionary and enabling the growth and change of York up to at least 2029. The objective to enhance linkages and connectivity from York Central through to the Central Shopping Area and the rest of York City Centre underpins this strategy and is a key component in both the City Centre Area Action Plan and emerging work on the York Central Supplementary Planning Document (SPD).

Figure 2: York City Centre Central Shopping Area (CSA)

Existing City Centre and Historic Core



39. Despite any improvements that can be made, York Central will remain an out-of-centre site in retail policy terms and development proposals will be subject to detailed impact testing with the overall objective of the Core Strategy Retail Policies being to protect and enhance the vitality and viability of the existing Central Shopping Area. Grimley highlight that improved connectivity between the site and the existing CSA will assist in being able to develop complementary retail areas and as it is the next sequentially preferable site it should be assessed as a potential longer-term retail site.

(3) Assessing the impact of retail development on York Central on the City Centre

40. Grimley has tested four different retail development scenarios on York Central to establish the trade draw and consequent impact on the Central Shopping Area of York City Centre. The retail scenarios that have been examined include three broad estimates of different scales of potential retail provision, and one more detailed scheme, which was put forward by CBRE, on behalf of Network Rail, with a mix of named retailers to be tested. Each retail development scenario is based on an open A1 department store anchored clothing and footwear led retail scheme: -
- Scenario 1 – 60,000 sq m net (645,000 sq ft net)
 - Scenario 2 – 40,000 sq m net (430,000 sq ft net)
 - Scenario 3 – 20,000 sq m net (215,000 sq ft net)
 - Scenario 4 – 46,450 sq m net (499,000 sq ft net)

Castle Piccadilly

41. The York Retail Study identifies Castle Piccadilly as the key development opportunity site in York City Centre. On this basis all scenarios tested assumed that a scheme on Castle Piccadilly (circa 24,000 sq m net) would be operating by 2015 (test date). The York Retail Study identified Castle Piccadilly as the key development opportunity site in York City Centre and it is recommended that the Core Strategy Retail Policy should seek to allocate the site for retail development (as part of an overall mixed use scheme). On this basis, it is necessary to first factor in comparison goods retail development at Castle Piccadilly to review the extent of market share increase and impact on York City Centre in advance of testing the proposal at York Central.
42. The effect of implementing Castle Piccadilly is to increase the inflow of comparison goods expenditure to the Central Shopping Area (CSA) from £753.6m to £899.3m – an uplift in the CSA turnover of £145.7m (19%).
43. As stated earlier, the market share of York City Centre has fallen from 37% in 2001 to 28% in 2008. Following the implementation of Castle Piccadilly in 2015 (test date) York's CSA market share would increase from 28% to 33%. This indicates that by expanding the city centre offer with the Castle Piccadilly scheme the City Centre would become more robust to competition from the wider sub-region (including competition from out of town centres) and claw back

some of the expenditure which is currently leaking to other centres such as Monks Cross, Clifton Moor, Leeds, Hull and Harrogate.

44. The impact of the different scales of York Central retail development on York's Central Shopping Area (CSA) market share is set out in table 3 below.

Table 3: Summary of Impact of Scenarios 1 to 4 (* turnover figures are not directly comparable between scenarios 1-3 and scenario 4 as this was based on revised growth rates)

Scenario	Projected comparison goods turnover of scheme @ 2017 (£m)	Projected Market Share for York Central Scheme from Catchment Area (Zones 1-16)	Projected Market Share for York City Centre CSA* with Castle Piccadilly @ 2017	Projected Market Share for York City Centre CSA with Castle Piccadilly & York Central @ 2017	Projected Market Share for Wider York City Centre with Castle Piccadilly and York Central @ 2017	Projected York City Centre CSA turnover @ 2017 with no new development	Projected Impact of Castle Piccadilly on York City Centre CSA turnover @ 2015 (£m)	Projected Impact of York Central on York City Centre CSA turnover @ 2017 (£m)	Projected Impact of York Central on York City Centre CSA turnover @ 2017 (%)	Projected Cumulative Impact of Castle Piccadilly and York Central on City Centre turnover @ 2107 (£m)	Projected Cumulative Impact of Castle Piccadilly and York Central on City Centre turnover @ 2107 (%)
Scenario 1 – 60,000 sq m net	£395m	12%	33%	26%	38%	£900.2m	+£145.7m	-£234m	-22%	-£60.1m	-6.7%
Scenario 2 – 40,000 sq net	£263m	8%	33%	28%	36%	£900.2m	+£145.7m	-£156m	-14.5%	-£17.3m	-2%
Scenario 3 – 20,000 sq m net	£131m	4%	33%	30%	34%	£900.2m	+£145.7m	-£78m	-7.3%	+£96m	+11%
Scenario 4* – 46,450sq m et	£260.3m	9.5%	33%	27%	37%	£767.6m	+£132m	-£155m	-17%	-£13.6m	-1.5%

*CSA – This is the Central Shopping Area of York City Centre (see Figure 2).

A summary review against each scenario is set out below.

York Central Scenario 1 – 60,000 sq m net at 2017

45. GVA Grimley estimate that in 2017 the comparison goods turnover of a 60,000 sq m net scheme at York Central would be in the region of £395m. A 60,000 sq m net scheme is larger than the total existing comparison retail floor space in York City Centre (56,000 sq m net). Calculations show that a scheme of this scale at York Central would compete strongly with the existing CSA for market share and that it would capture a strong proportion of overall comparison goods spend from the catchment area. As highlighted above the CSA would experience an increase in market share from 28% to 33% in 2015 following the implementation of Castle Piccadilly, but the implementation of York Central (60,000 sq m scheme) would result in a decline in market share in the CSA back to 26% with York Central capturing a 12% market share from the catchment area.
46. The cumulative market share of the wider York City Centre area, including both Castle Piccadilly and York Central would see an increase to 38% through effective claw back from expenditure from the wider sub-region and leakage to competing centres.
47. It is clear that a scheme of this scale at York Central would have a significant adverse impact on the Central Shopping Area with a loss of £234m of the CSA's overall turnover for comparison goods (-22%). The impact on the total trade draw of Monks Cross (-29%) is also significant based on direct competition in the clothing and footwear categories. Given the more bulky goods role of Clifton Moor, the impact on this shopping destination would be more limited (-7%).
48. Cumulatively, the impact on the City Centre CSA comparison goods turnover of both the Castle Piccadilly scheme and the 60,000 sq m net York Central scenario would be -6.7% as the growth in turnover from the implementation of the Castle Piccadilly scheme (+£145.7m) would absorb some of the impact of the York Central scheme (-£234m). This effectively means that this York Central scenario would erode the positive uplift and investment from Castle Piccadilly.
49. The cumulative impact of both schemes on other centres within the York area is also an issue to consider. Monks Cross would see the greatest level of impact with a reduction in comparison goods turnover of £69m (50%), Clifton Moor a 12% reduction in turnover (-£30m) and York Designer Outlet -6% (£5.2m).

York Central Scenario 2: 40,000 sq m net at 2017

50. Grimley estimate that in 2017 the comparison goods turnover of a scheme of 40,000 sq m net would be in the region of £263m. A scheme of 40,000 sq m net equates to approximately the same amount of comparison retail floor space that exists at Clifton Moor Retail Park (Non-food retail only). Calculations show that a scheme of this scale at York Central would compete with the existing city centre CSA for market share and that it would capture a strong proportion from the catchment area. The market share of York City Centre CSA would increase

to 33% following the implementation of Castle Piccadilly in 2015 but would revert back to the current level of 28% following the implementation of a 40,000 sq m net scheme at York Central in 2017.

51. Together the wider York 'City Centre' (including York City Centre and York Central) could achieve a market share in the region of 36% with a 40,000 sq m net but would still have an impact on city centre comparison goods turnover.
52. A 40,000 sq m net scheme at York Central would result in a loss of £156m of the city centre CSA's total turnover for comparison goods (14.5%). The impact on Monks Cross in terms of loss of turnover would be -£18m (19%), which is higher than the impact on the City Centre and could lead to adverse impacts in terms of vacant units, which would need to be managed through the Core Strategy retail policies. The impact on Clifton Moor would be less significant at -£11.5m (5%).
53. Cumulatively the impact on the City Centre CSA turnover of the Castle Piccadilly scheme and the 40,000 sq m net York Central scenario would be a 2% loss in comparison goods turnover compared to the no-development scenario. The cumulative impact of both schemes on other centres within the York area is an issue to consider. Monks Cross would see the greatest level of impact with a reduction in turnover of £60m (44%), Clifton Moor a 10% reduction in turnover (-£25m) and York Designer Outlet -5% (£4m).

York Central Scenario 3: 20,000 sq m net at 2017

54. Grimley estimate that in 2017 the comparison goods turnover of a scheme of 20,000 sq m net would be in the region of £131m. A 20,000 sq m net scheme is smaller than the existing amount of comparison retail floor space at Monks Cross that is around 27,000 sq m net (non-good retail only). Their calculations show that that a scheme of this scale at York Central would not compete as strongly with the existing city centre CSA for market share and that it would capture a lesser proportion of spend from the catchment zones. The market share of York City Centre CSA would increase to 33% following the implementation of Castle Piccadilly in 2015 and would drop to 30% following the implementation of this sized scheme at York Central in 2017, which is higher than the current level of 28% and still represents a claw back of some of the comparison goods expenditure which is currently leaking to other centres in the catchment area.
55. Together the wider York 'City Centre' (including York City Centre and York Central) could achieve a market share in the region of 34% with a 20,000 sq m net and the impact on city centre CSA turnover would be considerably less.
56. A 20,000 sq m net scheme at York Central would result in a loss of £78m of the city centre CSA's total turnover for comparison goods (7%). The impact on Monks Cross in terms of loss of turnover would be -£9m (9.5%), which is slightly higher than the impact on the City Centre. The impact on Clifton Moor would be less significant at -£2m (2%). Again the impact on other centres within the

catchment area would be much lower at between 0.1% to 2% of their total turnovers.

57. Cumulatively the impact on the City Centre CSA turnover of the Castle Piccadilly scheme and the 20,000 sq m net York Central scenario would still allow for an 11% growth in total turnover. This would still allow for a significant growth in turnover of the City Centre CSA of £96m whilst also allowing the growth in market share of the city centre CSA to increase from its current proportion of 28% to 30%.
58. The cumulative impact of both schemes on other centres within the York area would still need to be considered but are significantly less in terms of total turnover. Monks Cross would still see the greatest level of impact reflecting the fact that it is a clothing and fashion led scheme and would compete directly with the city centre and York Central for market share. Monks Cross would experience a reduction in turnover of £50m (37%), Clifton Moor an 8% reduction in turnover (-£19m) and York Designer Outlet -4% (£3m).

York Central Scenario 4 – 46,450 sq m net at 2017

59. Within this more detailed quantitative assessment, GVA have factored in a retail scheme of 46,450 sq m net comparison goods floorspace, just under 500,000 sq ft. It is estimated that by 2017 the comparison goods turnover of the York Central scheme will be in the region of £260.3m. The city centre CSA would experience an increase in market share from 28% in 2008 to 33% in 2015 following the implementation of Castle Piccadilly. The implementation of York Central in 2017 would result in a decrease to the CSA's market share to 27%, just below the current level of 28%, with York Central capturing a 9.5% market share from zones 1-16.
60. The cumulative market share of the wider York City Centre, including both Castle Piccadilly and York Central would see an increase in market share to 37% through effective claw-back of expenditure from the wider sub-region and leakage to other centres.
61. GVA's calculations show that the York Central scheme would result in a decrease in total comparison goods turnover of £154.6m for York City Centre (incl. Castle Piccadilly), which is a 17% impact on total turnover. The other main impact would be felt at Monks Cross, which would see a 22% impact and a loss of £18.1m of turnover, based on direct competition in the clothing, and footwear and general comparison goods retail categories.

Conclusions on Quantitative Impact Testing

62. Following the implementation of Castle Piccadilly in 2015 (test date), the Central Shopping Area is forecast to achieve market share uplift from 28% to 33%. The implementation of a comparison goods scheme at York Central measuring between 20,000 and 60,000 sq m net would equate to a fall in market share in the CSA from 33% to 30% to 26% respectively between 2015 and 2017. In quantitative terms a 20,000 sq m net scheme would still allow the market share

levels of the CSA to increase from current levels (28%) to 30%. A 40,000 sq m net scheme would mean that the market share of the CSA remains static at its current level of 28%.

63. A 20,000 sq m net scheme at York Central would result in an impact on the total turnover of the CSA of 7%. However, with the development of the Castle Piccadilly site and this size of scheme at York Central the City Centre CSA would still see an actual growth in its total turnover of 11% (£96m) and increase its market share from its current level of 28% to 30%. The City Centre was trading very well at the time of the York Retail Study with a comparison goods sales density of approximately £10,947 per sq m net against a national average of £5,500- £6,000 per sq m net. The impact of the recession on the retail sector is likely to have reduced this average sales density but it is still expected to be higher than the national average. A higher than average sales density is an indication of overtrading reflecting the constrained nature of retailing in the centre and the lack of major development schemes coming forward in recent years.
64. The city centre also has a vacancy rate lower than the national average. At the time of the Retail Study (2007) the percentage of vacant units in York City Centre was 7.25% (67 units) compared to 9.7% nationally. In 2008 the percentage of vacant units rose to 8.6% (76 units) however in 2009 the percentage had dropped back to 7.13% (63 units) which is significantly lower than the national average of 14.4% which is a good illustration of York's health as a retail centre. Latest figures from mid 2010 from a national retail database⁷ put York's vacancy rate at 10.7% that is one of the lowest rates in the Yorkshire and Humber region. The average vacancy rate for Great Britain in the same study is 13%. Other centres within the region have a much higher rate with centres such as Hull, Doncaster, Sheffield and Bradford all with rates above 20%.
65. York also experiences a high inflow of expenditure (34%) from outside its catchment zone reflecting the attractiveness of York as a shopping destination from much further a field. Based on their experience elsewhere in the country GVA Grimley conclude that York City Centre is performing considerably well in this sector and that these figures together with the lower than average vacancy rate, indicates a need for additional floorspace to absorb the large pot of available expenditure.
66. It is likely therefore that the projected level of impact from a scheme of circa 20,000 sq m net on total turnover could be absorbed in part by the existing level of overtrading that is evident in the city centre and also by the growth in expenditure that is forecast following the implementation of the Castle Piccadilly scheme and that it would not cause significant adverse impact on the future vitality and viability of the city centre particularly if improvements are made to linkages with the existing CSA to facilitate better movements between the Station area towards the historic core of the city centre.

⁷ Shop Vacancy Report – Mid Year 2010, Local Data Company, September 2010.

67. A 40,000 sq m net scheme implemented in 2017 would have an impact on total city centre turnover of 14.5%, which is more significant and would be more likely to cause an adverse impact on the existing CSA both in terms of turnover and relocations. A 60,000 sq m net scheme implemented in 2017 would have a 22% impact on the total turnover of the CSA, which is a significant and unacceptable level of impact, and furthermore the market share of the city centre would fall below the current level of 28% to 26%. A scheme of this size is likely to comprise of 50-60 units with a large anchor stores and development of this scale would be likely to lead to many vacancies in the core shopping areas, whilst fewer major multiples would remain to ensure visitation numbers, footfall and linked trips to the independent sectors.
68. In every scenario the market share of the wider York City Centre area would increase as a whole through claw back from competing centres but this would be achieved through the delivery of two separate shopping destinations.

(4) Other considerations such as regeneration benefits, employment benefits, increased investment and social inclusion for identified Sites (York Central)

69. PPS4 makes it clear that a wider impact assessment should be carried out in considering the suitability of a location for retail. Other considerations such as regeneration benefits, employment benefits, increased investment and social inclusion may be material to the choice of appropriate locations for development.
70. The following assessment of York Central has been carried out using the criteria set out in PPS4 under policy EC16 (The impact assessment for main town centre uses that are not in a centre).

The impact of the York Central site on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal

71. The wider economic benefits of anticipated public and private investment in a viable York Central development would be significant. The current work anticipates provision of around 9000 permanent jobs (FTE's) in a diverse range of sectors including knowledge-based industries, financial and business services, tourism and business tourism, leisure, recreation and retail.
72. Tourism provides direct economic benefits through employment and indirectly in other sectors e.g. in printing and publishing. The NRM has been identified a key area for investment in the York Tourism strategy and action plan. Without the development of York Central major improvements to the environment and public realm in the vicinity of the NRM, which will enable it to maintain and enhance its attractiveness as a national and international tourist destination, are unlikely to be realised.
73. The delivery of the planned urban quarter at York Central will attract significant levels of public and private investment to York; this is reflected in the sites

designation as a regionally significant investment priority and its promotion through the Leeds City Region Investment Plan. The anticipated investment will not compete with other planned investments within the predicted timeframes for delivery.

74. Retail development has been demonstrated through viability work to be necessary to realise the wider ambitions for economic development on York Central. Without delivery of York Central, potential investment in retail development may be channelled to less sustainable and less sequentially preferable out of centre sites in York and public and private investment in the broader economic redevelopment of the area, with the wider benefits for York's economy, may be lost.
75. Extensive sustainability, transport impact and viability testing has been undertaken on the York Central site, over a wide range of development scenarios. Financial viability testing was undertaken by consultants DTZ, and included sensitivity analysis around gross development value (GDV) and cost, as well as exploring the implications of provision of affordable housing to different levels. The conclusions of this work highlighted the fact that York Central has very high abnormal costs associated with its development, which renders many development scenarios unviable. This is reflected in the Council's own viability testing and in market testing by the York Central stakeholders.
76. The DTZ report establishes the fact that comparison retail significantly outperforms any other proposed land-use on York Central in terms of financial viability. Furthermore, incorporating retail development into a development scenario was shown to make other land uses, such as office and leisure, more valuable, increasing investor confidence and scheme viability.
77. We also need to consider the risk that development of York Central may also displace investment from the CSA and consider the quantum, type and phasing of retail to minimise this risk. The Council is promoting the Castle Piccadilly site for comprehensive retail development and although in the early planning stages the Castle Piccadilly developers have highlighted concerns that development at York Central could undermine the viability of the Castle Piccadilly. GVA Grimley consider that if either the Castle Piccadilly scheme or the York Central scheme came to fruition then it would let due to strong demand from retailers for a significant amount of retail space, however, if two competing schemes were to come to the market at the same time it would cause confusion and retailers could use it as a negotiating tool.
78. Castle Piccadilly is the sequentially preferable site and on this basis the expansion of the Central Shopping Area through Coppergate to Castle Piccadilly should be given priority in policy terms and the phasing of new development.

The impact of the York Central site on town centre vitality and viability, including local consumer choice and the range and quality of the comparison and convenience offer

79. This is in effect a “health check” of the City Centre. This was considered in detail in the 2008 Retail study. A detailed assessment of York Central’s impact would need to await developer selection and finalisation of scheme proposals, but the Grimley work on potential development scenarios gives an indication of likely impact. In general terms York Central could provide the opportunity to accommodate retailers who cannot find appropriately sized space within the City Centre, together with a range of smaller units necessary to achieve a viable retail development.
80. The detailed qualitative analysis of York undertaken as part of the retail study indicates that York is a healthy centre and that it was performing well in a number of health check indicators. The study concludes that the greatest threat to York is growing competition in the wider sub-region and lack of space to offer to higher quality, variety and department store operators to ensure that the city centre can compete effectively. In order for York to maintain its role in the retail hierarchy and attract shoppers from the catchment area and beyond, it is crucial that new modern retail space is created to attract a broader range and quality of multiple retailers to trade alongside the already strong independent sector. This is key as the multiple retailers are essential in order to create strong footfall levels to support and complement the independent retailers.
81. The difficulty is, however, that whilst the historic centre is one of York’s strengths, it also presents barriers to expansion and the introduction of modern units. The lack of space in the city centre has already encouraged a number of retailers to locate in out of centre locations. Any major development proposals or town centre extensions should conserve, respect and enhance the heritage value of York and continue to improve both the daytime and evening eating and drinking economy.

Whether the York Central proposal is of an appropriate scale (in terms of floor space) in relation to the size of the centre and its role in the hierarchy of centre.

82. Within the quantitative assessment, GVA have analysed York Central development scenarios ranging from 20,000 sq m net to 60,000 sq m net of comparison goods floorspace. York City Centre currently comprises of 55,698 sq m net, Clifton Moor Centre – 43,926 sq m net and Monks Cross – 27,250 sq m net. The floorspace of York City Centre following the implementation of Castle Piccadilly would be 79,698 sq m net.
83. The 20,000 sq m net York Central development scenario represents an increase of 36% of the total existing city centre comparison goods floorspace. The combined comparison goods floorspace of York City Centre with Castle Piccadilly and York Central (at 20,000 sq m net) would be 99,698 sq m net, which is an increase in size of 79% from existing levels.
84. In comparison to this the largest development scenario tested of 60,000 sq m net would be larger than the existing city centre comparison goods floorspace and larger than both Clifton Moor and Monks Cross. A 60,000 sq m scheme would increase the size of the city centre (with Castle Piccadilly) to 139,698 sq m net – a 151% increase on its current size.

(5) The Core Strategy and the recommended policy approach to future retail development

Policy Context

85. The Government's overarching objective (PPS4) is for sustainable economic growth. The aim is that the planning system contributes to building prosperous economies by, amongst other objectives, improving the economic performance of places; delivering sustainable patterns of development; and promoting the vitality and viability of town centres. PPS4 sets out policies that are intended to clarify the Government's approach and support for town centres.
86. PPS4 directs local planning authorities to identify an appropriate range of sites to accommodate the identified need for town centre uses, including retail provision for the period of the plan. It states that an apparent lack of sites of the right size and in the right location should not be a reason for authorities to avoid planning to meet the identified need. Local authorities should allocate sites based on need, identify sites of appropriate scale and in keeping with the role and function of the centre, follow a sequential approach to site selection and consider the regeneration benefits, employment and investment opportunities which may be offered by the allocations.
87. The Core Strategy must consider the strategic implications of how any longer-term retail development might affect the existing City Centre. Any longer term retail development would have to respect the existing compact nature of the CSA and any extension to the CSA would need to be well related to the existing core and have the opportunity to introduce walkable shopping circuits or loops. Longer-term expansion beyond the CSA must also be sensitive to the fact that the city centre relies to a large extent on the success of its retail function to provide economic support to its historic buildings.
88. The key aim of the Core Strategy in terms of city centre retail is to provide a distinctive retail offer with a high proportion of local, high quality independent retailers set within a world class shopping experience. Key issues for York are to:
 - Support independent offer whilst maintaining mainstream multiples to retain footfall
 - Accommodate growth whilst enabling sustainable, mixed use centres
 - Create supporting conditions for local and rural shops
 - Build on the unique and distinctive nature of the current offer whilst meeting functional and efficiency requirements of customers and the retail sector
 - Spread footfall without harming current areas of vitality
 - Attract visitors whilst providing for local people.
89. In terms of the Core Strategy Preferred Options consultation there was a range of view and opinions regarding the future growth and distribution of retailing in York. Some respondents felt that York should not seek to be the same as its regional comparators and that tourists come to York for its independent shops and the unique environment. Some felt that seeking to increase the market

share of York to 34% was too high in the current climate and that it would be unsustainable, at the expense of the historic buildings, lead to higher vacancies and issues of transport capacity. Others thought that a 34% market share target was too cautious and that York should be consolidating its role as a regional shopping centre. In terms of locations for future retail development 64% of respondents were in favour of Stonebow House as a location for retail development, 52% Castle Piccadilly and 30% York Central.

90. A target was set in the Preferred Options Core Strategy for the York City Centre CSA to aim to capture 34% of comparison goods expenditure from its catchment area (zones 1-16) with the aim to claw back market share, which is currently leaking to other retail centres in the catchment. This target was based on the original scenario 2 modelling work undertaken by GVA Grimley (York Retail Study, 2008). It is recommended that the Core Strategy Submission Retail policies should not aim to meet a set target for market share but that it should focus on delivering new shopping provision to support the vitality and viability of the city centre and to meet local shopping needs. By prioritising new retail development in the city centre on sites such as Castle Piccadilly and the Stonebow this will in turn, as demonstrated by the Grimley work, lead to an increase in the city centre's market share above the existing level through the positive impact of the investment and provision of new modern retail space.

A Phased and Sequentially Based Approach to future Retail Development

1st Phase – Central Shopping Area

91. Officers recommend that the retail policy priority in the first part of the LDF period up to 2020 should be to secure the successful implementation and operation of the Castle Piccadilly site and the other in-centre opportunities at Stonebow House and the Telephone Exchange and the absorption of this new floorspace into the trading patterns of the city. This will enable the provision of modern retail floorspace to meet the demands of retailers and encourage investment into the city centre. This investment will help to support the vitality and viability of the city centre through maintaining footfall levels that helps to support the important independent and specialist retail sector which makes York distinctive.
92. There will inevitably be some change within the central shopping area as retailers re-locate into new units provided and new retailers move in to occupy both the new and vacated space but it is essential to the future health of the historic core that such units are quickly taken up by new occupants to safeguard the fabric of the buildings. Using the revised baseline capacity forecasts Castle Piccadilly and Stonebow House would be fully supportable in retail floorspace terms by 2017 and their development would help to improve the vitality and viability of the city centre through the provision of larger modern floorplates and an anchor department store.
93. Castle Piccadilly and the smaller city centre opportunities should clearly be the first priority in policy terms and should be allocated as suitable sites for retail development in the LDF. In view of the importance of the Castle Piccadilly scheme to the future of the city centre it is important to ensure that other retail

commitments are not made that could undermine commercial confidence in executing the scheme and securing its full occupation and integration into the city centre.

2nd Phase – York Central

94. From 2017 onwards, population growth and rising expenditure across York's catchment area indicate that the city could support a further increase in retail floorspace, dependent on its impact on the CSA. The revised baseline scenario forecasts additional capacity of up to 56,348 sq m net by 2022 and 106,664 sq m net by 2029. In line with PSS4 it is important to plan proactively and positively for future retail development and there is clearly no further major retail development opportunities within or directly adjoining the CSA after Castle Piccadilly, Stonebow House and the Telephone Exchange.
95. York Central has been identified as the next sequentially preferable site outside of the CSA and is suitable for future retail development dependent on the impact on the vitality and viability of the CSA. From the initial impact assessment carried out by Grimley and the health check analysis of the existing City Centre a scheme in the range of 20-25,000 sq m net at York Central could be fully supportable in capacity terms by around 2020 onwards and the projected impact on city centre turnover of 7% could be absorbed by the projected growth in population and expenditure levels and the growth in expenditure that will have occurred following the successful development of the Castle Piccadilly scheme. The evidence shows that a scheme in the range of 20-25,000 sq m net at York Central along with the Castle Piccadilly development would increase the turnover of the central shopping area by 11%.
96. Further to this the impact test set out in PPS4 is not just about the quantitative impact on turnover but incorporates a much wider assessment of the other benefits to be gained from the proposed scheme. Analysis using the wider impact criterion set out in PPS4 (policy EC5.4 & EC16) has shown that the wider qualitative benefits of York Central in terms of increased investment, uplift in market share and the regeneration of a key brownfield site are key mitigating factors to be taken into account when assessing the suitability of the site for retail development. If sites are not allocated for this growth proactively through the planning process then there will be increased pressure from other out of centre retail destinations for increases to current floorspace levels. Monks Cross and Clifton Moor already absorb a significant amount of expenditure from the York Catchment and sequentially they are less centrally located than the York Central site.
97. A York Central Project of the scale required to deliver the Councils objectives for a new Central Business District and National Railway Museum improvements will not be financially viable without additional value drivers or funding. Emerging work suggests that a viable York Central development scenario could be produced around the establishment of two distinct but complementary areas of development, the first phased over a short to medium timeframe, and the second in the longer term. Each area could deliver a viable development proposal, within

an overarching comprehensive framework. This would be reliant on public funding and on incorporating a quantum of comparison retail with other land uses.

98. In line with policy EC3 PSS4 recommends setting a floorspace threshold for the scale of edge and out of centre development that should be subject to detailed impact assessment under policy EC16.1. It is recommended therefore that a range of 20,000 sq m net to 25,000 sq m net be set as a 'suitable threshold' for retail development at the York Central site post 2020 and should be embedded in the Core Strategy retail policies. The policy should include caveats to ensure that this 'threshold' is subject to more detailed impact testing at application stage in line with policy EC16 of PPS4.
99. Following the developments of Castle Piccadilly, Stonebow House and York Central it will take time for trading patterns to be absorbed into the city centre. A period of monitoring and evaluation is needed to test the validity of the longer-term projections to 2029 and also to monitor closely the health of the city centre. It is recommended that York Central is highlighted as the next priority for additional retail growth post 2020 and it is anticipated that between 20,000 sq m net and 25,000 sq m net comparison retail floor space could be supported in this location subject to further detailed impact testing at the time of any proposal. Although up to 106,664 sq m net of potential retail capacity has been forecast up to 2029 this does not mean that all this capacity must be allocated. Capacity alone does not simply allow unrestricted retail development across the city. Any future development would be subject to a future review of the Retail Study and upon further stringent testing of impact on the Central Shopping Area of York City Centre.

Other Out of Centre Retail Proposals

100. Beyond the strategic allocations made in the Core Strategy Retail Policy all other retail proposals will be tested at the time of application and considered in light of the sequential approach, the deliverability of the strategic retail allocations and the impact on the city centre in line with Planning Policy Guidance and the York Retail Study.
101. A draft Core Strategy retail policy is included below to show Members how a policy on the future distribution of retail growth could be written in line with outcomes of the evidence base work using the reasoned justification highlighted in paragraphs 91 to 100 of this report. This policy approach will obviously be dependent on Members views on the issues raised in this report and the accompanying topic paper and on the discussions at the LDFWG. It is proposed that following this LDFWG a policy approach will be brought back to a later LDFWG as part of the Core Strategy Submission Consultation Draft.

Policy CS...: Distribution of Retail Growth

The Council will seek to support the vitality and viability of the city centre and the central shopping area will continue to be the primary focus for new comparison goods retail development.

Future retail development will be phased as follows:

Phase 1: Central Shopping Area

Pre 2020, priority will be given to developing the Castle Piccadilly area and the Stonebow area for comparison retail (approximately 28,000sqm) and developing these as extensions to the central shopping area.

Phase 2: York Central

Post 2020, the next priority will be York Central (part of the York Northwest area), and it is anticipated that between 20,000sqm and 25,000sqm net comparison floorspace could be supported in this location subject to detailed impact testing.

Out of Centre Retail

Other out of centre retail development will need to be considered in light of the sequential approach, the deliverability of other out of centre retail sites and the impact on the city centre and other retail allocations.

Convenience retail development will be directed to the city centre, Acomb and Haxby district centres and smaller centres (within other Local Service Centres, villages and small villages as well as neighbourhood centres) at an appropriate scale.

Corporate Priorities

102. The Core Strategy, including York Central and the approach to meeting future retail need, has the potential to contribute towards the delivery of all the Corporate Priorities through its policies and actions. It will aim to make York a:

- Sustainable City
- Thriving City
- Safer City
- Learning City
- Inclusive City
- City of Culture
- Healthy City

Implications

103. The following implications have been assessed:

Financial – None
Human Resources (HR) - None
Equalities - None
Legal - None

Crime and Disorder - None
Information Technology (IT) - None
Property - None
Other - None

Risk Management

104. In compliance with the Council's Risk Management Strategy, there are no risks associated with the recommendations of this report.

Recommendations

It is recommended that Members:

105. Approve, subject to the recommendations of this working group, the York Retail Topic Paper attached as Annex 1 to this report, for publication as part of the LDF evidence base.

Approve, subject to the recommendations of this working group, the York Central Retail Assessment Stage 1 and 2 (included as background papers to the Topic Paper) for publication as part of the LDF evidence base.

Reason: So that the York Central Retail Topic Paper and the York Central Retail Assessments can be used as part of the LDF evidence base.

106. Delegate to the Director of City Strategy, in consultation with the Executive Member for City Strategy and the Shadow Executive Member for City Strategy, the making of any other necessary changes arising from the recommendation of the LDF Working Group, prior to their publication as part of the LDF evidence base.

Reason: So that any recommended changes can be incorporated in to the York Retail Topic Paper and York Central Retail Assessment.

107. Note the recommended policy approach to future retail development as set out in paragraphs 95-105 of this report as a starting point for developing the approach to retail development in the Core Strategy submission draft.

Reason: To inform Members of the recommended officer approach to future retail development for the Core Strategy submission draft.

Contact Details

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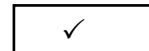
Chief Officer Responsible for the report:

Richard Wood
Assistant Director of City Strategy
Tel: 551448

**Report
Approved**



Wards Affected: *List wards or tick box to indicate all*



For further information please contact the author of the report

Annex 1 – York Retail Topic Paper – Core Strategy Evidence Base