

1 INTRODUCTION

Purpose of the Report

1.01 This report has been prepared by White Young Green Planning on behalf of the Yorkshire and Humber Assembly. The purpose of the report is to identify the key issues that need to be considered by the Assembly under a 'retail and leisure' theme, in developing the Regional Spatial Strategy.

1.02 In considering this, and in response to the brief produced by the Assembly the report has been structured to undertake the specific tasks outlined below:

- Undertake a review of the existing RPG 12 in relation to retail and leisure issues, having regard to current and draft national guidance in the form of PPG's 6 and 11, PPS's 6 and 11 and relevant ministerial statements, such as the Gambling Bill;
- Review guidance provided in other regional planning documents and the work being undertaken to inform the revisions to these documents to form the Regional Spatial Strategies;
- Identify how existing Policy in RPG 12 could be developed in the light of the previous tasks findings to better meet Government expectations; and
- Make recommendations as to what additional work is required to be able to undertake the changes required to revise the Regional Guidance.

Structure of Report

1.03 The report is set out as follows:

Section 2: Reviews existing guidance in RPG 12 in the context of Government expectations set out in guidance relating to planning for retail and leisure development;

Section 3: Reviews regional guidance relating to retail and leisure development produced by other regional bodies;

Section 4: In the context of the findings of Sections 2 and 3, this section examines the approach to reviewing the policies relating to retail and leisure development in the regional guidance for Yorkshire and the Humber;

Section 5: Sets out the work necessary for a review of regional policy;

Section 6: Provides a summary and sets out the key conclusions to this report.

2 REVIEW OF EXISTING RPG12 POLICY RELATING TO RETAIL AND LEISURE DEVELOPMENT

Introduction

- 2.01 The purpose of this section of the report is to review existing retail and leisure policy with reference to government guidance in PPG's 6 and 11 and the draft versions of PPS 6 and PPS 11. This section also considers the implications of the emerging Gambling Bill.
- 2.02 The current version of RPG 12 was issued in October 2001 and provides a regional spatial strategy looking forward to 2016. Policy SOC3 of RPG 12 provides a framework for the consideration of retail and leisure policies in the Yorkshire and Humber Region supported by text in paragraphs 8.16 – 8.23.

“Policy SOC3 Retail and Leisure Facilities:

- a) No further out-of-centre regional or sub-regional shopping centres or large-scale expansion of those that exist, including Meadowhall and White Rose, should be permitted.*
- b) In developing strategies for retail and leisure development local planning authorities should undertake an assessment of need in their areas and apply the sequential approach set out in PPG 6 to identify sufficient sites in or on the edge of existing town centres. This approach should apply equally to assessing any proposals to provide additional floorspace to existing edge-of-centre or out-of-centre development and to new forms of retail and leisure development.*
- c) Where major leisure development, for which there is a proven need, cannot be accommodated within or on the edge of town centres after having demonstrated flexibility in the search for more central sites as required by PPG 6, development plan strategies should make it clear that improvement to public transport facilities and other non-car modes will be required as part of the development to ensure that sites are highly accessible by means other than the private car.*
- d) In preparing development plans, local planning authorities should establish hierarchies for the centres in their areas which should identify the regional, sub-regional and local roles of city and town centres and, in particular, those centres to which Policies SOC3a) and E1 should apply.*

e) *Local planning authorities should:-*

- i) maintain a good quality, level and range of provision for retail and service needs appropriate to serve the catchment area;*
- ii) minimise the need for travel especially by car;*
- iii) seek to encourage joint planning and collaborative action by public and private service providers to promote innovative ways of maintaining or re-introducing local services in town and village centres which are identified as having a weak or limited range having regard to the size and character of the catchment area;*
- iv) promote and support the local service centre role that certain towns and villages play for surrounding areas to retain essential services and facilities for rural communities.”*

PPG 6

2.03 PPG 6 as clarified by subsequent Ministerial Statements, sets out the Governments policies on planning for town centres and retail development. The key themes are:

- The requirement to demonstrate a ‘need’ for new retail and leisure development;
- Emphasis on a plan-led approach to promoting development in town centres, both through policies and the identification of locations and sites for development; and
- Emphasis on the sequential approach to selecting locations for development, for retail, employment, leisure and other key town centre uses;

2.04 Paragraph 1.4 of PPG 6 states that regional planning guidance should set out the development strategy for each region, indicating the role that the network of town centres should play and proposing a broad strategy for its development, including the scope, if any, for additional regional shopping centres. Regional shopping centres are defined as out-of-town centres generally over 50,000 square metres gross retail area.

2.05 PPG 6 introduces the concept of a sequential approach to site selection for retail and leisure proposals in the development plan process. Preferred locations for such development are existing town centres, followed by edge-of-centre sites, lower order centres, and then out-of-centre sites. This guidance emphasises that this process should only be undertaken where the need for further development can be demonstrated.

2.06 In supporting the role and function of centres, PPG 6 advocates the development of a hierarchy to highlight the range of centres and also to provide guidance as to where future retail and leisure development will be directed.

- 2.07 Existing RPG 12 reflects the key themes of PPG 6 and provides additional detail. Policy SOC3 of RPG 12 emphasises the need for a plan-led approach to new development and provides a framework of policy to be cascaded down to development plans.
- 2.08 Parts b and c of Policy SOC3 require that the sequential approach as set out in PPG 6 be used in the identification of sites for further development in development plans. As required by PPG 6, Policy SOC3 requires that Local Authorities specify in their development plans out-of-town centres where no further development should be permitted. Part d requires that in the preparation of development plans a hierarchy of centres is identified. Additionally, part e provides advice for Local Authorities in terms of encouraging new development which would support or rejuvenate the role and functions of certain existing centres.
- 2.09 From our review of the guidance in RPG 12 and in particular Policy SOC3 we conclude that it is generally consistent with the guidance contained in PPG 6.

Draft PPS 6

- 2.10 PPS 6 will, in due course, replace PPG 6. Draft PPS 6 is largely based on existing PPG 6 as clarified by subsequent Ministerial Statements. The key themes of the PPS are:
- Plan-led approach at regional and local levels;
 - The requirement to demonstrate a need for new development;
 - The importance of the sequential approach in considering new development;
 - Ensure access to everyday goods and services for all; and
 - The need to promote sustainable patterns of development.
- 2.11 Paragraph 2.10 of the draft PPS sets out the role of regional plans as setting out a vision and a strategy for a regions growth, including the main centres in the region, and provide a strategic framework for planning at the local level.
- 2.12 Paragraph 2.11 provides further detail and states that in revising an RPG or preparing an RSS, the regional planning body should:
- *“develop a vision and strategy for the development of the balanced network of centres in their region and for each sub-region, and avoid excessive concentration of facilities in the highest level of centres;*

- *make clear strategic choices about where growth should be encouraged, including in new centres in areas of planned major growth; which centres should have more limited growth; and, if appropriate, the identification of centres where decline should be managed and existing development consolidated. In making its strategic choices, the regional planning body should balance the different needs of the communities and centres within its region and each sub-region;*
- *assess the overall need for additional floorspace over the plan period for the uses addressed in this statement, and especially for retail, leisure and office uses, and for 5-year periods within it, and consider where the identified needs for key town centre uses would best be met having regard to the Government's objectives;*
- *assess the capacity of existing centres to accommodate additional development;*
- *address the Government's objectives set out in Section 1; and*
- *monitor and regularly review the implementation of the strategy," (para 2.11).*

2.13 It is considered that this guidance places significant additional burdens on regional Planning Bodies. To comply with the emerging guidance, the RSS will need to consider providing the following information over and above the guidance that is already provided in RPG 12:

- Establish a network of centres, having considered their role and function and position within the hierarchy.
- Make an assessment of need for retail and leisure floorspace, including assessing the capacity of existing centres to accommodate further growth and those where decline should be managed.
- Make location specific recommendations for retail and leisure development (not necessarily site specific).

2.14 In undertaking this additional work there are identified difficulties in terms of the guidance provided. PPS 6 does not draw a clear distinction between the work that should be carried out at a local level and that at a regional level. This applies to the identification of locations for development, the carrying out of capacity assessments of existing centres and the assessment of need in centres. There is an implication that the regional strategy should focus on centres of a regional or sub-regional importance. However, there will undoubtedly be some overlap (and potential differences) between the assessments at the local and regional levels. What is clear is that the current retail and leisure policies in RPG 12 will need to be reviewed to be consistent with PPS 6 (assuming the Draft version is not changed significantly).

PPG 11

2.15 PPG 11 acknowledges that PPG6 provides the primary policy guidance on the preferred locations for key town centre uses, including retail and leisure. In reviewing RPGs, PPG 11 requires that regional planning bodies should:

- *“indicate the role that the network of town centres should play and propose a broad strategy for its development;*
- *assess the need for major new retail facilities or large-scale expansion of existing retail facilities of regional or sub-regional importance. The role and scope for such major retail facilities should be addressed initially in RPG rather than developed unilaterally in development plans; and*
- *taking full account of sustainability considerations, identify which town centres, well served by public transport, should be the focus for major new retail development, so as to harness it in the regeneration of existing town centres,” (para. 7.1)*

2.16 This guidance seeks to reinforce the more specific guidance provided in PPG 6, but requires regional bodies to assess need for “major” development of regional or sub-regional significance.

2.17 In considering what is major retail development PPG 11 states that this should be agreed by the Regional Planning Body in consultation with stake holders. Similar considerations apply to major leisure and entertainment facilities. Paragraph 7.3 of PPG 11 states:

“The common aim should be to ensure that such major new facilities, serving a regional or sub-regional catchment, promote the vitality and viability of existing town centres and are accessible by a variety of transport modes including good quality public transport.”

2.18 Turning to look at the existing guidance in RPG 12, Policy SOC3 identifies that local planning authorities should establish a hierarchy of centres in the development plan, in line with PPG 6. PPG 11 refers to the establishment of a network of centres with their respective roles and broad strategy for their development being determined by regional planning bodies more akin to the advice in PPS 6. In that sense, RPG 12 could be considered inconsistent with PPS 11 (and PPS 6) and this should be addressed in the forthcoming RSS. With that exception, the advice in RPG 12 is considered to be generally consistent with that in PPG 11.

Draft PPS 11

2.19 The draft PPS 11 outlines the new arrangements for regional planning, paragraph 1.3 states that:

“The RSS should confine itself to genuinely regional and sub-regional matters and not provide a check list of everything that should be covered in a local development document or transport plan,” (para. 1.3)

- 2.20 It is noted that the RSS should not identify individual sites for development but should, as stated in paragraph 1.15, establish locational criteria appropriate to regionally or sub-regionally significant development (including retail and leisure).
- 2.21 With reference to the existing regional guidance in RPG 12, it is considered that this will need revision to comply with the more onerous requirements to identify locations for future regionally or sub-regionally significant development.

Gambling Bill

- 2.22 The Gambling Bill is likely to introduce to the UK large scale casinos, which given their potential impact, should be considered at a regional level. The Ministerial Statement in August 2003, stated there would be a requirement for Regional Planning Bodies to identify locations where they feel such development could be accommodated. The statement also indicated that, such development can significantly contribute to tourism and the local economy, as well as assisting in the regeneration of areas.
- 2.23 In June 2004 the Government issued its response to the First report of the Joint Committee on the Draft Gambling Bill. Most of that response deals with issues relating to the regulation and licensing of gambling facilities in the context of balancing the perceived need to allow the gambling industry to expand and the perceived risks to the community associated with problem gambling.
- 2.24 However, in respect of the Joint Committee’s recommendations relating to casinos, the OPDM response provides an indicative categorisation of casinos into small, large and regional based on a combination of factors relating to minimum gaming table area, minimum additional gambling area and a minimum non-gambling area. Regional casinos are defined as having a minimum gaming table area of 1000sqm, a minimum additional gambling area of 2500sqm, a minimum non-gambling area of 1500sqm, leading to a minimum total customer area of 5000sqm. The non-gambling area is considered regulatory (to provide the customer with an area where they can take breaks from gambling) and the OPDM suggests that the on-site, non-gambling area could incorporate a range of uses including “restaurants, bars, cafes, cinemas, sporting facilities or the like”.

- 2.25 The OPDM has also provided a supplementary response to the Joint Committee on the Draft Gambling Bill which is attached as an Annexe to the main response. This is intended to deal with matters arising from the Joint OPDM – DCMS statement on casinos made on 7 August 2003. In addressing the issues of defining the term “resort casino” the OPDM cross refers to the above definition of regional casino premises, which will have a minimum customer area of 5000sqm. Cross reference is also made to the potential ancillary uses which could be provided within the (compulsory) non-gambling area.
- 2.26 Notwithstanding this seemingly helpful definition, when addressing the question “How will the Government advise Regional Planning Boards how to consider locations for regional casinos?”, in the Annex, the OPDM response refers to current advice in PPG11, emerging PPS11, emerging PPS6 and PPG13 stating that *“the effects of these policy statements is to enable RPBs to define regional casinos as regionally significant leisure or inward investment proposals as they see fit.”* This would indicate that RPBs will be given discretion in the definition of locational criteria for the establishment of regional level / resort casinos, although clearly they should be viewed as regionally significant leisure facilities and hence will be subject to the various policy tests set out in draft PPS6 relating to need, appropriate scale of development, the sequential approach to site location, impact and accessibility.
- 2.27 Finally, it is noted from the introduction to the Government Response that the Government acknowledges that it was not possible for the Committee to reach a final view on the issue of the role of Regional Planning Bodies in considering the location of the largest casinos provided for under the Bill. The Government therefore propose to *“put motions before both Houses of Parliament to renominate the Committee to consider their final view on this one issue”*. It is hoped that the Committee will be able to report before Parliament rises for its summer recess. Therefore, some further guidance on this matter can be anticipated.

Conclusions

- 2.28 There is clearly the need for the revised Regional Guidance to be fully compliant with national planning guidance. However, in the light of the fact that certain relevant components of national planning guidance are in a state of flux, particularly in respect of PPS’s 6 and 11 which are still in draft form, it is difficult to provide definitive advice on the way ahead at this stage. In respect of casino developments the current OPDM advice on how to plan for these or deal with applications is somewhat ambiguous and relies heavily on the application of planning policy guidance which is still in draft form. Nevertheless, in terms of progressing the strategy forward there is an initial requirement to update the guidance in RPG 12, since the policy guidance therein relating to retail and leisure development is clearly at odds with the thrust of the emerging guidance on the role

and function of an RSS in respect of those matters. The key features to be considered are therefore:

- The establishment of a network or centres in the region, establishing the role and function of these centres at a regional and sub-regional level.
- Identify the scale of need for major retail and leisure development at the regional and sub-regional level.
- Identify a strategy for growth of centres
- Identify locational criteria for determining where the future growth should be directed.

3 REVIEW OF REGIONAL GUIDANCE PRODUCED BY OTHER REGIONAL BODIES

Introduction

- 3.01 The purpose of this section of the report is to provide information on the preparation of other regional spatial strategies so to identify best practice which can be used in the formulation of Yorkshire and Humber's Retail and Leisure policies.
- 3.02 This element of the project has been undertaken by examining information available and published by other regional assemblies including adopted and draft RPG's and also from telephone conversations with representatives of other regions.

Summary of Retail / Leisure Policy in existing RPG's and Progress in Preparing RSS's

North East

- 3.03 RPG 1 provides comprehensive guidance on town centres, retailing and commercial leisure issues, including Policies TC1, 2, 3, 4, RD1, 2, 3, LD1, SR1, 2, 3, 4, 5, 6. The policies in general reproduce guidance in PPG 6 and address the following issues:
- Town centres should be the focus of future retail leisure and commercial development;
 - Local planning authorities should identify a hierarchy of centres;
 - Advises that the sequential approach to assessment of development should be used; and
 - No further out-of-centre retail development.
- 3.04 In reviewing this document the Association of North East Councils commissioned a consultant to provide a report, considering the need for, and distribution of, new shopping and leisure development in the region. This report was carried out in 2002 by White Young Green Planning (Manchester). The consultant's study will become a supporting document to the Draft RSS which was published for consultation this Summer (2004). The study sought to establish the need for further retail or leisure developments in the region and assess how the growth should be directed to contribute to urban renaissance, social inclusion and the creation of more sustainable patterns of development.
- 3.05 The study identified:

- the policy, legislation and market trends that affect the location of new retail and leisure developments;
- the main town centres in the region and their retail and leisure composition. A vitality and viability exercise was also carried out for these centres having regard to the criteria outlined in PPG 6;
- how existing facilities met the needs of residents and where improvements were required;
- the functions, catchment areas and inter relationships of the larger centres;
- the quantitative capacity of existing centres to accommodate further growth considering future trends in spending;
- the qualitative need for development to meet deficiencies in existing provision; and
- the centres most able to support new retail and leisure floorspace in a sustainable manner, centres where new retail and leisure facilities are needed to safeguard their vitality and viability or to further socially inclusive development aims.

3.06 The study was considered to be hampered by the lack of retail and leisure information available on some centres. It was considered that a consistent and regular appraisal of existing retail and leisure facilities should be undertaken. In terms of producing a hierarchy of centres the consultants recommended that the RPB consider what other factors, in addition to retail shopping patterns, should be taken into account to plan for future growth.

East Midlands

3.07 Guidance for the East Midlands is currently provided by RPG 8, which is in the process of being reviewed. Policy 17 provides guidance on sustaining the role of centres, in respect of retail and leisure provision it advocates a sequential approach to new development where a demonstrable need exists. Reference to guidance in PPG 6 is also made.

3.08 Policy 37 provides guidance on sport, leisure and recreation development, reference is made to assessing proposals in a sequential manner.

3.09 In reviewing the regional guidance, in terms of retailing and leisure, the East Midlands Regional Local Government Association commissioned a study by DTZ Pineda Consulting, to look at town centres. This study was to help inform the review of the guidance in terms of existing government requirements. This review commenced in 2002 with a draft version published in April 2003. The Public Enquiry into the review of RPG 8 was held in November/December 2003, with the revision likely to be adopted in late 2004.

3.10 The study by DTZ Pineda sought to:

- identify the existing hierarchy/network of centres and the potential for the network of centres to accommodate any need for major retail and leisure uses. The study also looked at the wider roles of major centres beyond their retail function;
- provide guidance on a regional strategy framework for establishing policies to support the role of lower order centres;
- identify the scale of need for major retail, leisure and other facilities at the regional and sub-regional level over the plan period. This included looking at the relationship between competing centres within and outside the region; and
- identify how such need could provide opportunities to reinforce the individual roles of centres in terms of urban regeneration, sustainable development etc.

3.11 Having considered the report, the key changes to the regional guidance were that the town centre report was used to inform the policies to make it more regionally specific and look at the sub-regional level.

South West

3.12 RPG 10 currently provides regional guidance for the South West. Policy EC6 provides guidance on town centres and retailing, it recommends that:

- large retail developments should be located in the centres of the Primary Urban Areas;
- development should be of an appropriate scale to the centre in which it is to be located and should be in keeping with their size and function of the centre;
- the vitality and viability of existing centres should be protected and enhanced by assessing the need for new development by applying the sequential approach in PPG 6 to site selection for both retail and leisure developments;
- no further development to construct or extend out-of-town shopping centres.; and
- development should be located to reduce the need to travel and contribute to the regeneration and environmental improvement of town centres.

3.13 Policy TCS2 provides guidance on culture, leisure and sport and states that Local Authorities should identify opportunities for new leisure facilities and ensure such facilities are readily accessible by sustainable modes of transport.

3.14 To inform the forthcoming review of the South West regional guidance, the assembly have commissioned a study by CACI to identify a baseline for existing retail provision in the region. The study will provide an analysis of the basic role and function of the study centres including their

catchment areas and turnover. The study will specifically look at sub-regional and city areas to identify a hierarchy of centres and their relationships in terms of competition. There is no study currently being undertaken in terms of identifying a qualitative or quantitative assessment of need.

West Midlands

- 3.15 RPG 11 provides regional guidance for the West Midlands. Town centres are identified as remaining the focus for future retail development and that the vitality and viability of existing centres should be maintained or enhanced. The emphasis of the guidance is in general consistent with PPG 6 in that new development should be considered in a sequential manner, having regard to vitality and viability of existing centres. Further out-of-centre development on a regional scale is not considered necessary.
- 3.16 The West Midlands undertook a review of RPG 11 in 2001 this was informed by additional studies including a report by Chesterton's into the hierarchy of centres in the West Midlands. This resulted in the formulation of new policy UR4 'Enhancing the role of City, Town and Local Centres', in the revision to the RPG.
- 3.17 The study undertaken by Chesterton's sought to explore the theory that there is a natural order of centres which should be maintained and protected. The study produced sought to:
- produce a framework for analysing the network of centres within the region;
 - analyse whether the concept of a hierarchy is valid in describing how the network of centres operates;
 - identify the current hierarchy/network to identify recent, current and potential future changes to the hierarchy/network;
 - to examine the concept of need for new retailing and leisure facilities which can contribute to reinforcing the role of centres through urban renaissance and sustainable patterns of development;
 - to examine how useful the concept of the hierarchy of centres is in determining sustainable locations for major development within the network of centres; and
 - to consider the trends and pressures affecting lower order centres and advise on policies to help support the vitality and viability of these centres.

North West

- 3.18 Guidance for the North West is provided in RPG 13. Policy EC8 provides guidance regarding town centres, retail, leisure and office development. This states that development plans should

continue to protect, sustain and improve towns and cities and their roles as shopping destinations. This should be done through encouraging new retail and leisure development in existing centres. The sequential approach to the assessment of retail and leisure development should be adopted as set out in PPG 6.

- 3.19 A partial review of RPG 13 was undertaken in 2003 and is currently issued for public consultation. This review did not include any revisions to the retail or leisure policies. The North West are currently writing a brief for a retail and leisure study which is likely to include specific reference to casino's/gambling resorts, however, funding for this work is still being agreed. There is therefore no change from the current RPG 13 at this point in time.

South East, East of England and London

- 3.20 Guidance for the South East and East of England is currently provided in RPG's 6 and 9, these will eventually be superseded by RPG 14 for the East of England and RPG 9 for the South East.
- 3.21 Policy 13 of RPG 6 provides guidance on town centres and retail development. The guidance identifies that existing centres should be the focus of future growth and that the sequential approach should be used for the assessment of proposals. Development plan policies should promote and enhance the vitality and attractiveness of centres. This guidance document is not considered to conform with the advice in PPG 11 and is therefore to be amalgamated with RPG 9 when it is reviewed.
- 3.22 Policy Q5 of RPG 9 identifies that existing network of larger town centres should be the focus of major retail and leisure development and that this will assist in ensuring the vitality and viability of town centres as well as sustainable patterns of development. The guidance also states that the need for further development should be established and that areas of future growth should be identified in a sequential manner as outlined in PPG 6.
- 3.23 RPG 3 provides guidance for the London Authorities, but will be replaced by the London Plan. Chapter 5 of RPG 3 provides guidance on town centres and retailing. The guidance refers to advice in PPG 6 but also makes specific reference to the role and function of centres within the region. The range of functions which a town centre has are also identified. The guidance also makes reference to the importance of town centre health checks to monitor the vitality and viability of town centres.
- 3.24 The above regions jointly commissioned a study by Nathaniel Lichfield and Partners to look at the methodologies for analysing town centres. This report was published in 2004 and is to be used in informing the forthcoming reviews of the region's spatial strategies.

- 3.25 The purpose of the commissioned studies was to assess the methodologies for undertaking an analysis of retail need and town centre development capacity. It considered the information available and suitable for assessing the need for major new retail facilities within future reviews of regional planning guidance.
- 3.26 The study considers that in order to assess the need for retail development at a regional level that the region must establish the role of centres and the hierarchy, then having established this, will need to identify catchment areas to assess the need for development in each area.
- 3.27 The study then outlines a range of methodologies for allowing the region to establish its hierarchy of centres and to define catchment areas. The report also indicates the important role of Local Authorities of providing information to the region to assist in these matters. In the South East a brief is to be produced to look at the health of town centres, the network and catchment areas of centres and to identify areas of growth.
- 3.28 Having considered this report the three regions are now in the process of commissioning a further study to forecast future retail growth in the main regional/sub-regional catchment areas of the region. The results of this study will then assist in developing the town centre and retail strategies for the region. Specifically the study will:
- define the role, network and relationships between centres at regional/sub-regional levels;
 - identify regional/sub-regional catchment areas, forecast future growth and allocate it to the areas; and
 - consider past trends a future scenarios for retail growth.

The methodology for this research was detailed in the previous study by NLP.

- 3.30 In the East of England a draft of RPG 14 was published in February 2004, which will eventually replace RPG's 6 and 9. This included policies identifying a structure of centres, a retail strategy for location of development and a policy on the provision of out-of-centre retail developments. The current RPG is with the Secretary of State pending further work to be undertaken.
- 3.31 In London, borough level forecasts of consumer expenditure for 2001 – 2016 were calculated by CACI to help inform the EIP. However, it was recognised that further work to review town centre capacity, vitality and viability was required. In this respect the GLA are to be commissioning consultants to identify the broad, strategic need for future retail floorspace in the major centres. This will then provide a framework for more local and precise studies to be undertaken. The study

will assist in directing future growth in retail floorspace. The London Boroughs are carrying out town centre health checks, to assist in this matter.

Yorkshire and the Humber

3.32 As an integral element of the preparation of the regional settlement strategy for Yorkshire and the Humber, North Yorkshire County Council has been commissioned to establish an information base to help to define the function and character of the main settlements within the Region. The resultant report, entitled “Regional Spatial Strategy – Settlement Study Report”, which describes the methodology used, the main findings and identifies areas of future work required, was published in June 2004.

3.33 The study does not seek to consider the four largest settlements within the region – Leeds, Bradford, Hull and Sheffield, on the basis that there are other sub-regional studies currently taking place which cover those settlements. However the study provides a comprehensive assessment of 233 settlements in the Region, using 70 data sets (based on a wide range of defining characteristics derived from a variety of sources), which seek to:

- draw out the key features unique to particular settlements that provides a better understanding of how each functions within the Region;
- inform the functional classification of settlements; and
- identify a pattern of settlement characteristics which will allow ready comparison.

3.34 The study classifies the various centres considered, using the data gathered, on the basis of a number of criteria grouped under 4 main categories, as follows:

- Location
- Service Role
- Functions
- Prosperity

The assessment yielded a number of important findings in terms of the role and function of the various centres. In terms of the service role (under which criteria relating to the provision of retailing and recreation/leisure facilities were analysed), the study concluded that 11 sub-regional centres can be identified, these being Barnsley, Doncaster, Grimsby/Cleethorpes, Harrogate, Halifax, Huddersfield, Rotherham, Scarborough, Scunthorpe, Wakefield and York.

- 3.35 However the study recognised that there were several shortcomings relating to both the availability of data and to the methodology employed to analyse the data, which potentially limited the degree to which the study could be relied upon as the basis for developing the regional strategy. Several of these identified shortcomings are relevant to this study, as follows:
- i) The report acknowledges that while the assessment methodology employed provides a good deal of information about individual settlements and therefore provides consistent basis for comparing individual settlements, it provides little information on how settlements relate to each other; for example in terms of movements between centres in order to access services. Numerous household surveys carried out within shopping and leisure studies demonstrate that patterns of shopping and leisure activity within a given catchment area are determined to a significant extent by the range or choice of retail and leisure facilities available both within and adjoining the catchment area. In the case of comparison retailing, the larger regional/sub-regional centres and the major out of centre concentrations of retailing, will tend to attract customers from a wide geographical catchment area encompassing a large number of smaller settlements. Patterns of movement to access large scale commercial/leisure facilities are also likely to be geographically wide ranging.
 - ii) The settlement study report acknowledges that there is an absence of readily available and comprehensive data on retailing provision and confirms that the information that is available from the various planning authorities in the Region is patchy and inconsistent (in terms of measurement and timing of data collection). While the study incorporates information derived from Experian Goad, that information is only available for 53 of the largest town centres and out of centre retail concentrations within the Region, and does not provide information on retail services in other locations.
- 3.36 The settlement study report notes that further information on accessibility is likely to become available in respect of travel to work from the 2001 census results, through imminent government research and through work on strategic transport provision. Such information is likely to be useful in the future assessment of shopping and leisure patterns within the Region.
- 3.37 While the availability of information on retail provision within the Region is incomplete, for the purposes of assessing the future distribution of shopping provision within the Region as part of the regional spatial strategy, it is likely that the information available from Goad Plans of the major centres will be sufficient, provided that the Goad information available is up to date and consistent across the Region in terms of the date of centre surveys and provided that the information is up dated every few years to coincide with the re-assessments of capacity/need carried out under the Regional Spatial Strategy.

Conclusions

- 3.38 It should be noted that many regional assemblies are yet to revise their documents since the most recent government publications including the draft versions of PPS's 6 and 11. Therefore, the research commissioned and approaches previously undertaken in preparing regional policy identified above are not necessarily examples of best practice. However, they provide useful background for informing the review of Yorkshire and Humber's Spatial Plan.
- 3.39 The commissioned studies detailed above essentially have undertaken the following tasks to assist in the formation of policies relating to retail and leisure in regional plans:
- Sought to identify a hierarchy/network of centres in the region (sub-region)
 - Identify the roles/functions of these centres in the region and how they interact
 - Identify centres which should accommodate future major retail or leisure development over the plan period (catchment areas, spending growth etc)
 - Establish policies that will support the role of lower order centres (ensure the vitality and viability of existing centres)
 - Assess the need for further retail and leisure development in the region/sub-regions over the plan period
 - Exploration of how to integrate retail and leisure policies to assist in other regional plan policies, e.g. Sustainable development, urban regeneration, 24hr cities
- 3.40 The South East, East of England and London also commissioned a joint study to assess the methodologies for undertaking an analysis of retail need and town centre development capacity. This was specifically aimed at assisting with future reviews of regional guidance. It concluded that regional bodies would need to set out a broad vision for town centres and make recommendations on the functional capacity and desirability for town centres to accommodate growth.
- 3.41 The level of detail into which regional plans examine retail and leisure issues currently, varies considerably. The more recently issued RPG's notably the North East (2002) go into considerably more depth in terms of the level of guidance provided. However, it is noteworthy that most Regional Assemblies now consider that the RSS's should be concise policy documents rather than lengthy guidance publications. This is to reflect the additional weight now to be attached to RSS's, given they are to form part of the statutory development plan. The additional weight to be attached to RSS's may require that the policies are more wide ranging however the policies should remain concise with additional information being supplied in supporting text where necessary or in separate supporting documents.

Recommendations

- 3.42 Consideration should be given to undertaking a qualitative and quantitative assessment for further retail and leisure development in the region over the plan period. This should also include an assessment of the current hierarchy/network of centres and an examination of the role/function they fulfil. That assessment should take into account the information derived from the settlement study carried out by North Yorkshire County Council on behalf of the Assembly. However, further research will be required to examine the interrelationship between centres and the relative importance of centres, in meeting retail and leisure centre needs within the Region.
- 3.43 The assessment of future provision of retail and leisure development should be coordinated with other initiatives designed to meet other aims and objectives within the RSS, such as those relating to urban regeneration and strategic housing provision

4 THE APPROACH TO REVIEWING OF REGIONAL PLANNING GUIDANCE ON RETAIL AND LEISURE MATTERS FOR YORKSHIRE AND THE HUMBER

Introduction

4.01 The previous sections of this report have highlighted that current retail and leisure policies in RPG12 are not consistent with the Government expectations, particularly those set out in draft PPS6. The key elements which are missing are as follows:

- A clear hierarchy of existing centres which serve as focal points for retail and leisure uses;
- A strategic assessment of the need for additional retail and leisure development in the region (and sub-regions); and
- Guidance on the most appropriate locations for new retail and leisure development.

4.02 In this context, this section examines the approach to reviewing regional planning guidance relating to retail and leisure development, with a view to ensuring consistency with Government expectations, as set out in draft policy statements.

The Approach to the Study

4.03 From a theoretical perspective, there are two contrasting approaches assessing 'need' across a region. The first approach can be described as a 'bottom-up' approach producing a detailed and specific assessment of need, and requires a great deal of input from local planning authorities (LPAs). The other approach can be described as 'top-down' and provides a more strategic assessment of need requiring more limited involvement from LPAs. The main benefits and drawbacks associated with these approaches are shown in the diagram at **Appendix A** and described in more detail below.

The Bottom-Up / Detailed Approach

4.04 The bottom-up approach would require a great deal of involvement from local planning authorities (LPAs) and would lead to a highly detailed and complex study. LPAs would assist in gathering information, possibly conducting surveys, and assessing capacity (both physical capacity and expenditure capacity) within their administrative boundaries.

4.05 The main benefit attributable to the bottom-up approach is that it would provide a comprehensive assessment of the retail and leisure needs of the region. The assessment could provide both a strategic and local view on need. Much of the detailed work could be disseminated to LPAs who

would then be responsible for reporting back to the Assembly for collation.

- 4.06 This approach would see a series of detailed assessments, undertaken at the local level, and carried out using the same methodology, which would then feed into an overall strategy for the region. The detailed work would involve town centre and out-of-centre surveys, healthcheck assessments, on-street surveys, household telephone surveys, retailer demand assessments, quantitative capacity assessments, and site appraisals (i.e. the common ingredients of a local authority retail and leisure study). The Assembly could co-ordinate the study and ensure that the methodological approach is consistent across the LPAs. In theory, such an approach would produce a detailed region-wide study which would obviate the need for local authorities to produce their own studies.
- 4.07 However, the problems associated with this bottom-up approach are numerous, as discussed below:
- 4.08 Government guidance encourages a strategic approach to planning for new development at the regional level and PPS6 requires regional planning bodies to make general assessments of need in their regions. This implies that need should be looked at on a regional or sub-regional basis, leaving LPAs to carry out more detailed assessments at the local level in context of the findings of the regional assessments. A more general study looking at sub-regions could take into account the need to direct investment towards failing or vulnerable centres, for example. A series of devolved assessments is unlikely to consider the wider strategic issues. LPAs inevitably compete for investment which potentially conflicts with taking a strategic approach to encouraging development in the region. Therefore, to avoid potential conflict, it would seem sensible for an independent body to carry out the assessments of need and identify locations for development.
- 4.09 Logistically, it would be extremely difficult to coordinate a study which involves LPAs gathering information and carrying out needs assessments. Consistency in approach would be vital and is probably best dealt with by a single body.
- 4.10 Some LPAs will already have up-to-date and detailed retail and leisure studies, in accordance with PPG6 and Draft PPS6. Indeed, we are aware of a number of authorities in the region who have completed studies in the past year. Requiring these authorities to repeat the exercise (albeit perhaps using a different methodology) would seem both unreasonable and wasteful.
- 4.11 In terms of timescales and costs, a detailed study involving input from local authorities would be time consuming and expensive. Notwithstanding the fact that some LPAs have only recently completed retail studies which would, in effect, be redundant, the additional burden on the public purse is likely to be excessive for such a study. We understand that other regional bodies have

found it difficult to secure funding for the more complex studies, largely due to the cost implications.

The Top-Down / Strategic Approach

- 4.12 The top-down approach to preparing the study would require far less involvement from LPAs. Much of the background information could be gained from individual authorities (and given their local knowledge, this information should be gained from LPAs), but the various key components of the project would largely be carried out by the Assembly (or by contractors on their behalf). Again, the top-down approach has its benefits and problems.
- 4.13 The top-down approach facilitates a broader, more strategic assessment of the needs of the region, and sub-regions. It would allow an objective view of the existing hierarchy of centres which act as a focus of retail and leisure uses and, would allow a review of this hierarchy if necessary through controlling the scale of future development in cities and towns within the sub-regions. This would enable the Assembly to encourage appropriate development and investment to areas which are in the most need and, if necessary, avoid the over-domination of the largest centres.
- 4.14 The 'top-down' approach also enables synergy with other strategies at the regional level. For example, planning for retail / leisure growth in a particular centre should tie in with economic, housing or transport strategies for that settlement.
- 4.15 In terms of timescale and costs, the broad assessment would be cheaper than the detailed, 'bottom-up' study, and could be produced in a considerably shorter timescale. In light of the requirement to review capacity assessments regularly (approximately every 5 years), timescale and cost is an important consideration. Also, if the assessment is of a general nature, rather than detailed, it will be easier to update.

Conclusions on the Approach to Reviewing Policy

- 4.16 Having regard to the above, it is considered that a regional retail and leisure study should be approached from a strategic, 'top-down' perspective. This would enable the Assembly to make important strategic decisions in respect of the future hierarchy of centres, ensure that the scale of development is appropriate in each sub-regional area, and influence the location for new retail and leisure development. This approach would be relatively cost effective, and a study could be produced relatively quickly, and can be updated as necessary. The regional assessment will provide the framework for LPAs to prepare more detailed retail and leisure assessments at the local level.

5 FURTHER WORK NECESSARY FOR THE REVIEW OF REGIONAL PLANNING GUIDANCE

Introduction

- 5.01 Section 2 of this report has identified three key areas where current RPG policy does not accord with Government expectations in respect of regional planning for retail and leisure developments. These are setting a regional hierarchy of centres, assessing the need for new development within the region and sub-regional areas, and broadly identifying locations in which to meet the identified need.
- 5.02 Section 3 examined best practice from other regional bodies and, in this context, Section 4 has evaluated the possible approaches to reviewing regional policy and addressing the deficiencies in current policy to meet the Government's requirements.
- 5.03 This section identifies the key elements required to successfully review existing policy in accordance with Government expectations, and outlines the various stages of the work necessary for a regional retail and leisure study to inform the policy review.

Establishing a Hierarchy of Centres

- 5.04 This report advocates a top-down approach to a regional retail and leisure study. In this respect the work carried out to classify the various settlements in the Region (excluding the regional centres) by NYCC in their Settlement Study Report, is a useful first step, in that it provides a basic hierarchy of centres based on a range of criteria, including level of retail floorspace and number of retail outlets and number of supermarkets. Its principal benefit is the identification of the 11 sub-regional centres. However, the other identified centre classifications under the "service role" category, i.e. principal service centre, local service centre and basic service centre, do not fit neatly with SPG6 / PPS6 definitions of centres.
- 5.05 The data gathered by NYCC on existing floorspace within the 53 largest centres in the Region based on Experian Goad Plans is a useful resource. However this should be supplemented by information on both the larger and smaller centres where possible, available from local authorities. To that end a 'shopping list' of required information should be issued to all LPAs in the region. This will include both factual data (floorspace in smaller centres and out-of-centre locations, changes in vacancy rates, shop rentals, pedestrian flow data, retailer representation and demand, and town centre manager reports) and information relating to potential sites or opportunities (development briefs, masterplans etc). This sets an information framework for comparing the

strengths, opportunities, weaknesses and threats of major cities and towns in each sub-region.

5.06 Finally, a household telephone survey should be commissioned to assess shopping and leisure patterns in the region. This will establish which centres attract the most residents for different types of shopping and leisure activities. The household survey is discussed in more detail below.

5.07 The information collected will enable an assessment of the existing hierarchy in the region. It is likely that centres graded according to their status as follows:

- Regional Centre (serving the region as a whole)
- Sub-Regional Centre (serving sub-regional areas)
- Major Town (or City) Centres (serving more limited catchment areas within sub-regions)

5.08 The DTZ Pleda East Midlands Regional Town Centre Study (2003) raises the fundamental issue of whether hierarchies should be descriptive or prescriptive. On the one hand, the existing hierarchy demonstrates how centres have evolved over the years and indicates the level of investment and attractiveness of each centre. In most cases, the existing regional hierarchy is well-established and patterns of shopping and leisure activity are unlikely to change dramatically. However, on the other hand, it could be that the existing hierarchy does not meet the needs of the region's population as a whole. For instance, a regional centre may not be centrally located and may not be particularly accessible to a significant proportion of the region's population, particularly those without access to a car. In such cases, a regional body may wish to 'influence' the hierarchy by directing growth towards centres which are better located to serve the 'disadvantaged' population. This could be achieved by elevating the status of certain centres.

5.09 PPS6 highlights the need to balance the different needs of the communities and centres within the regions and sub-regions, and states that *"at both the regional and local levels, planning authorities should plan the distribution of growth, using it to rebalance the network of centres to ensure that it is not overly dominated by the largest centres, that there is more even distribution of facilities, and that people's everyday need are met at the local level," (paragraph 2.7)*. In this context, PPS6 indicates that gaps should be filled by promoting centres to function at the higher level in the hierarchy.

5.10 Therefore, it is considered that whilst it is important to have regard to the existing centre hierarchy within the region and sub-region, it is perhaps more important to prescribe changes to the hierarchy if a need to redistribute facilities is identified. Identification of the existing hierarchy can be achieved, and potential changes to the hierarchy can be informed, by the methodology and work outlined in this section.

Assessing Need

- 5.11 An assessment of need for additional retail and leisure development across the region is required. Before assessing need, in quantitative and qualitative terms as advocated by Government policy, it will be helpful to review the general trends in retail and leisure industries, and sub-sectors within each industry. This analysis, examining issues such as historical growth rates and the influence of e-commerce, will set the background to the needs assessment, and identify particular trends which may influence patterns of growth. Having identified the general trends, it is appropriate to consider quantitative and qualitative needs.

Quantitative Assessment

- 5.12 Firstly, a region-wide assessment of the quantitative need for additional comparison goods floorspace should be undertaken. For this, a household survey is required which would identify shopping patterns for clothing, footwear, other non-bulky comparison goods, DIY goods, furniture & carpets, and electrical goods.
- 5.13 The household survey will identify the influence of the largest centres across the region for comparison goods shopping. Not only will this identify the existing hierarchy, but it will also indicate the likely expenditure capacity available to those centres over the period of the study (and for 5 year periods within it) and therefore the likely scale of development which could be accommodated. The assessment will indicate the current market share of centres within the region and, coupled with the assessment of qualitative deficiencies, will identify any imbalances in provision across the region. If the study indicates that it would be beneficial for some centres to grow at a higher rate than others in order to provide a more even distribution of facilities and services, then the quantitative assessment and projected market shares can be adjusted.
- 5.14 The quantitative assessment requires a great deal of primary research and will be the most time consuming (and costly) part of the study. Whilst individual local authorities can have a constructive input into the household survey questionnaire, for the reasons given in Section 4 previously, it would be preferable from a strategic perspective for the Assembly to undertake the quantitative needs analysis.
- 5.15 Patterns of shopping for convenience goods tend to be more localised and the provision of new convenience goods floorspace will generally have a less than sub-regional influence on shopping patterns, although obviously the inclusion of a major superstore anchor within a sub-regional scale retail development will exert a wider influence on convenience shopping patterns through linked trip activity. However, the visits to such a facility are likely to be less frequent than the well established weekly / fortnightly bulk food shopping patterns associated with large supermarkets

which provide customer car parking. In the light of this, coupled with the resource implications and the logistical issues associated with questionnaire length, we recommend that the regional assessment of quantitative needs focuses on comparison goods retailing, with assessments of the need for new convenience retailing being carried out at the local authority level.

Qualitative Assessment

- 5.16 Qualitative need should be addressed on a general level. Indicators of need would include the following:
- qualitative deficiencies in existing retail, retail service and leisure provision;
 - the need to bolster the vitality and viability of particular centres;
 - the need to meet the specific requirements of groups within the community; and
 - the need to support other socio-economic strategies including regeneration objectives
- 5.17 In respect of major leisure development, due to the lack of any accepted methodology for forecasting the quantitative need for the various types of commercial leisure use, it will be necessary to rely on a qualitative assessment of the need for new major leisure development, based on an examination of the scale, location and general quality of existing provision information on travel modes used and distances travelled to access existing facilities and information on commercial demand from key providers. It will be important to ensure that the regional level study focuses on major leisure facilities with more than local significance such as concert arenas, regional / resort casinos, ski domes, multiplex cinemas, theme parks etc.
- 5.18 As mentioned previously, much of the background information relating to indicators of need can be collected from local authorities. Many authorities should already have up-to-date records but where information is missing, the Assembly may have to obtain the data with the assistance of the local authority. Authorities will also need to provide a summary of their strategies for town or city centres, particularly in respect of aspirations for major centre expansion or regeneration schemes. The needs of specific groups in the community can be ascertained through the household survey and through discussions with the relevant departments in local authorities.
- 5.19 In summary, therefore, clearly there is a considerable amount of work required in gathering and analysing the relevant data in respect of identifying qualitative need for additional retail and leisure development. Some of the information required has been gathered as part of the settlement study work carried out by NYCC. Further data will already have been collected by local authorities but there will inevitably be different approaches, missing datasets, and dates of survey will vary. Therefore, collecting outstanding data, and collating and comparing the information from local authorities will initially be a relatively time consuming exercise. However, if local authorities are

provided with a check list of data that they will be charged with collecting and updating and this is subsequently held on a centralised data base, then the process of reviewing the needs assessment in future years, is likely to be a relatively straightforward exercise.

Summary of Need

- 5.20 The Assembly will need to undertake a broad quantitative capacity assessment (based on the results of a specially-commissioned household survey) for comparison goods, then take strategic view having regard to all indicators of need, and other socio-economic strategies, of the extent to which each of the main centres in the region should be the focus for all new retail and leisure development.

Identifying Locations for Development

- 5.21 Having regard to the foregoing elements of the study, it will be necessary to identify which areas of the region should be the focus for new retail and leisure development. The decisions will be based on, *inter alia*, existing patterns of shopping and leisure activity, the needs of residents in the region, current levels of vitality and viability in centres, and the overall socio-economic visions and strategies for centres in the region. On this basis, some centres may be identified as being 'priorities' for investment. This may be because strong economic growth is forecast in that particular area, or that investment in the past has been lacking, or that some residents do not have convenient access to particular services (or a combination of these factors).
- 5.22 If it is necessary to identify 'Priority Centres', then regional policy should seek to ensure that the strategy for growth in these centres is not undermined by strategies developed at the local level.

Timescale

- 5.23 Given the work necessary to prepare a strategic assessment, and in particular the need to commission and undertake a household telephone survey, it is unlikely that a full assessment could be drafted in less than four months.

Resource Implications

- 5.24 In order to help provide an indication of the likely costs associated with implementing a regional levels needs study relating to comparison retail and leisure uses, we have contacted two specialist research companies to obtain budget estimates for carrying out and tabulating the results of a household shopping survey. On the basis that the estimated population within the

Region is just over 5 million (2001 census) and taking account of the significant variation in the concentrations of population within the Region, we have confirmed with the research companies that a sample size of around 5,000 would be required to ensure statistically robust sample sizes within all population zones across the Region and taking account of the need for appropriate quota samples based on age and sex criteria. We have also assumed that respondents would take no more than 5 minutes to complete the questionnaire.

- 5.25 The resulting estimated fee budgets are between £30k to £35k. Assuming that it would be the intention to use specially appointed external consultants to interpret the outputs from the household shoppers survey (and the qualitative assessments of need) and then use the data to forecast growth in expenditure and assess floorspace capacity (and potentially to make recommendations relating to the distribution of identified floorspace capacity with the region), there is likely to be an additional cost of between £20k to £30k to obtain those specialist services.

6 SUMMARY AND CONCLUSIONS

6.01 The purpose of the report is to identify the key issues that need to be considered by the Assembly under a 'retail and leisure' theme, in developing the Regional Spatial Strategy.

6.02 From our view of retail and leisure policy guidance in RPG12, we conclude that this generally concurs with current national planning policy set out in PPG6 and PPG11. However, much of the guidance of which the Regional Spatial Strategy would be based is, itself, in a state of flux with both PPS6 and PPS11 both currently in draft form. Nevertheless, taking into account the relevant provisions of those draft PPS's, it can be concluded that there is a requirement to update the guidance in RPG 12 with the key features to be considered being:

- The establishment of a network or centres in the region, establishing the role and function of these centres at a regional and sub-regional level.
- Identify the scale of need for major retail and leisure development at the regional and sub-regional level.
- Identify a strategy for growth of centres
- Identify locational criteria for determining where the future growth should be directed.

6.03 Following an examination of best practice from other regional bodies, the following tasks have generally been undertaken to assist in the formation of policies relating to retail and leisure in regional plans:

- Identifying a hierarchy/network of centres in the region (sub-region)
- Identifying the roles/functions of these centres in the region and how they interact
- Identifying centres which should accommodate future major retail or leisure development over the plan period (catchment areas, spending growth etc)
- Establishing policies that will support the role of lower order centres (to ensure the vitality and viability of existing centres)
- Assessing the need for further retail and leisure development in the region/sub-regions over the plan period
- Exploring how to integrate retail and leisure policies to assist in other regional plan policies

6.04 It is recommended that consideration should be given to undertaking a qualitative and quantitative assessment for further retail and leisure development in the region over the plan period, and to undertake an assessment of the current hierarchy/network of centres and an examination of the role/function they fulfil. The provision of further retail and leisure development can be coordinated and located to help meet other aims and objectives stated within the RSS.

- 6.05 It is considered that a regional retail and leisure study should be approached from a strategic, 'top-down' perspective. This would enable the Assembly to make important strategic decisions in respect of the future hierarchy of centres, ensure that the scale of development is appropriate in each sub-regional area, and influence the location for new retail and leisure development. This approach would be relatively cost effective, and a study could be produced relatively quickly, and can be updated as necessary. The regional assessment will provide the framework for LPAs to prepare more detailed retail and leisure assessments at the local level.
- 6.06 Considerable work will be necessary for the Assembly to prepare a strategic assessment and, in particular, there is a need to commission and undertake a household telephone survey. It is estimated that a full strategic assessment would take between 4-6 months to prepare.

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