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at Brighton & Hove City Council

Retail Policies Topic Paper

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Introduction

The original purpose of this Topic Paper was to set out the background evidence supporting the proposed policy approach to the council's retail frontage policies as set out in Policies DM12 'Changes of Use within Regional, Town, District and Local Shopping Centres', and DM13 'Important Local Parades, Neighbourhood Parades and Individual Shop Units' in the draft City Plan Part Two (CPP2) and published for consultation in 2018. These policies were considered necessary to complement adopted policy CP4 Retail Provision of City Plan Part One (CPP1) when determining planning applications. The paper was updated in 2020 to take account of consultation responses received during the Proposed Draft CPP2 consultation.

Since the previous update of this paper the government has made changes to the Use Classes Order which came into effect in September 2020. The city has also been affected by the global Covid-19 pandemic which has seen many businesses in town centre having to close either temporarily or in some cases permanently. The full impact of business closures is unknown as England approaches the easing of lockdown measures due from 12 April 2021.

Further changes to this paper are therefore required to outline reasons for the proposed changes to Policies DM12 and DM13 that are considered necessary in order to address changes to the Use Class Order and Covid-19 since the Proposed Submission Plan was approved by the council in April 2020 and formally consulted on 7th September – 30th October 2020. These proposed changes to the retail policies have been drafted and will be submitted alongside the City Plan Part Two for the Inspector to consider during the examination of the Plan¹.

Retail Trends and Consumer Habits in the UK

Pre Covid -19 Pandemic

Retailing is influenced by factors such as transport (including car ownership), population growth, communications, and the latest consumer trends.

The decline in the retail sector nationally, particularly for high street trade, over the last decade has been well documented with increasing competition from online shopping (rising from 4.9% of retail sales in 2008 to 17.9% in 2017²) and out-of-centre retail parks. Other factors in high street decline are reported to include the comparably high business rate costs for high street traders, in relation to the operational costs for out-of-centre site occupiers and online stores.

Overall Brighton & Hove had managed to resist retail trends with just eight percent of vacant retail space in 2017-18 compared to some other cities experiencing up to 24% vacancies.³

¹ Schedule of Proposed main and minor changes to the City Plan Part 2

² The Local Data Company (June 2018) Retail and Leisure Trends Report 2017/18

³ Centre for Cities, City centres: past, present and future, February 2019

Whilst the proportion of internet sales have steadily increased, online retail spend still accounts for less than 20% of total retailing spending (2017)⁴. Services offering a 'customer experience' such as hairdressers or beauty salons have performed well (topped the? categories for net openings 2012-2017) while the more traditional clothing / fashion and shoe stores have declined. It was reported by the Guardian newspaper in January 2019 that a thousand extra hair and beauty salons opened up in town centres nationally, with more than 40 salons opening in Brighton and Hove alone.⁵ The latest data demonstrates the trend-led nature of the sector, with extensive openings of e-cigarette stores, independent coffee shops and vegan restaurants in 2017.

Leisure uses on the high street have substantially increased - particularly in terms of food and drink led by casual dining and coffee shops. Across the UK food and beverage outlets located in prime and secondary retail locations have been increasing by over 1% per year between 2008 and 2017 - representing around 2,000 net new outlets per year. This is being partly driven by changes in society; the desire for 'experiences' rather than products, the increase in one-person households who seek to socialise away from home, more family meals out (accounting for over a quarter of the market) and smart phone usage allowing instant access to information⁶.

Local 'Express' style supermarkets have also risen in popularity which suggest a move away from a weekly main food shop to more frequent, short trips for 'top up' shopping.

Effects of the Covid-19 Pandemic

The Covid-19 Pandemic has seen non-essential shops and services close several times during national lockdowns, with an increased reliability upon click and collect and takeaway services to sustain businesses. This has in the short term, influenced the behaviour of customers and further increased the levels internet shopping and businesses providing this service. In the longer term if these trends continue this could have impacts on the nature of town centres and the way consumers shop and participate in leisure activities. These longer-term implications are harder to predict and quantify and are related to the length of crisis/potential further lockdowns and likely recovery period.

In the short term, businesses are likely to face higher risk to cash flow and increased costs arising from a fall in consumer demand and disruption to supply chains. Retailers with infrastructure to fulfil on-line orders/home delivery are benefiting at least in the short term.

There may be longer term shifts to multi-channel shopping, reducing the demand for physical space within town centres. Bearing these trends in mind, following the Covid-19 crisis there is likely to be a spike in town centre vacancies with unfortunately some businesses failing to re-open. Many operators have already announced job losses and

⁴ Grimsey, B. (July 2018) The Grimsey Review 2 'It's time to reshape our town centres' available from: <http://www.vanishinghighstreet.com>

⁵ <https://www.theguardian.com/cities/ng-interactive/2019/jan/30/high-street-crisis-town-centres-lose-8-of-shops-in-five-years>

⁶ Springboard and The NPD Group (2017) Retail Destinations: The Eating Out Opportunity

store closures. The true extent of the impact for Brighton & Hove will be seen as lockdown measures start to relax.

The council has been working hard to ensure small businesses benefit from the packages of measures announced by the government to support small and medium enterprises (SMEs) through the period of disruption caused by COVID-19. These have included small business grant funding and Local Restriction Support Grant. More recently the council is working with Brilliant Brighton (a not-for-profit organisation, formed of 517 retail, leisure and hospitality businesses within the city centre) to make use of vacant premises within Brighton city centre. The temporary project aims to utilise empty properties in Brighton's city centre, by offering short-term pop-up shop opportunities to those looking to host their own store, restaurant or cafe, but don't want a long-term commitment⁷. The council is also offering some of its empty retail and hospitality units for art organisations to use on a cost-only basis, for a minimum six-month term.

Policy Context

National Context

Relevant legislation is set out in the overarching Town and Country Planning Act 1990 and the Planning Compulsory Purchase Act 2004.

The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework, supported by the National Planning Practice Guidance (NPPG).

The NPPF requires Local Planning Authorities, in drawing up Local Plans to support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. The NPPF provides policies on how Local Plans should consider town centres uses and how planning applications for town centres uses should be considered.

Paragraph 85 of the NPPF requires local authorities to:

a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;

b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;

The NPPF also requires planning policies to:

“guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs” (paragraph 92).

⁷ [Brighton Pop Up Shops](#)

Historically, shops and other town centre uses provide an active street frontage, contributing towards a lively street scene and often provide an important social/community role whilst maintaining their primarily retail role.

The NPPF defines main town centre uses as follows:

- Retail development (including warehouse clubs and factory outlet centres);
- Leisure;
- Entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls);
- Offices; and
- Arts, culture and tourism development (including theatres, museums, galleries, or a combination of the two)

The NPPF 2018 removes the expectation for local authorities to define primary and secondary frontages within their town centres. However to be consistent with the City Plan Part One policy CP4 Retail Provision and the Retail Study 2011 it is considered that the definition allows for the continuation of the distinction of primary and secondary frontages in all Regional, Town and District Centres contained within the retail hierarchy.

Legislative Changes

Use Classes Order changes

In recent years there have been changes to the classifications of certain use categories, and the scope for changing use, which is relevant to this report. The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 (SI 2020 No.757), which were made on 20 July 2020 and took effect on 1 September 2020, made important changes to the already much amended 1987 Use Classes Order.

In summary the Regulations introduced three new use classes:

1. Class E (Commercial, business and service) – including retail, restaurant, office, financial/professional services, indoor sports, medical and nursery uses along with “any other services which it is appropriate to provide in a commercial, business or service locality”;
2. Class F.1 (Learning and non-residential institutions) – including non-residential educational uses, and use as a museum, art gallery, library, public hall, religious institution or law court; and
3. Class F.2 (Local community) – including use as a shop of no more than 280 sqm mostly selling essential goods, including food and at least 1km from another similar shop, and use as a community hall, area for outdoor sport, swimming pool or skating rink.

Parts A and D of the original Schedule to the Use Classes Order have been entirely deleted, with Use Classes A1, A2, A3, parts of D1 and D2 subsumed into new Use Class E along with Class B1.

Changes of use within this new Class E will not constitute development and will not require planning permission. This new flexibility is not linked to spatial considerations and therefore will apply both to high streets and all town centre uses located outside of centres. The government has said that the main driver of change has been the need to enable a repurposing of buildings on high streets and town centres. The new Class E allows for a mix of uses to reflect changing retail requirements. It will allow a building to be used flexibly by having several uses taking place concurrently or by allowing different uses to take place at different times of the day.

The new concept of 'Local Community' uses – Class F2 – has been introduced to ensure important community facilities are protected through the planning system. Again, changes of use within this class do not require planning permission.

Certain uses have now become sui generis uses, with the effect that no changes of use to or from these uses fall within permitted development. These include pub/drinking establishment (A4), hot food takeaway (A5), venue for live music (D2), cinema (D2(a)), concert hall (D2(b)) and bingo hall (D2(c)).

From 1 September 2020 until 31 July 2021, change of use permitted development rights set out in the General Permitted Development Order 2015 will continue to be applied based on the existing use classes, as they exist on 31 August 2020. New permitted development rights are due to be introduced from 1 August 2021.

The recent changes to the Use Classes Order have meant that the council have had to reconsider the role of the town centre policies in the City Plan Part Two. This will be discussed further on in this paper.

Permitted Development Rights

As of 1st August 2021 the Government will also allow commercial buildings within the Class E use to be converted into homes via prior approval⁸.

Under the new permitted development right, local authorities will only be able to refuse applications on limited grounds including flooding risk, noise pollution and inadequate natural light. Homes produced will have to meet national space standards. The right will be available on premises of less than 1,500sq m in size, and only for premises that have been vacant for three months prior to the date of applications. Buildings must have been in the E use class for 2 years. In addition, whilst there is additional protection for conservation areas, the permitted development right will still apply in these areas. There will also be additional criteria to assess the loss of health centres and nurseries.

Local Context - Existing Retail Frontage Policies

The adopted City Plan Part One policy CP4 Retail Provision provides the overarching strategic policy relating to retail provision in the current defined shopping centres of the city and states that a “hierarchy of shopping centres will be maintained and enhanced by encouraging a range of facilities and uses, consistent with the scale and function of the

⁸ Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021

centre to meet people’s day-to-day needs, whilst preserving the predominance of A1 use classes”.

Policy CP4 retains the shopping centre hierarchy within the city from the Brighton & Hove Local Plan 2005 (BHLP) except for Brighton Marina, which was removed from the District Centres list following the City Plan Inspectors Report (February 2016). The retained policies of BHLP 2005 are set out in Appendix 3.

A review of all the primary, secondary, and local frontages was undertaken in all the centres as part of the City Plan Part 2 preparation to inform the policy development.

Centre Hierarchy	
Regional Centre	Brighton Regional Centre
Town Centres	Hove Town Centre London Road Town Centre
District Centres	St James’s Street District Centre Lewes Road District Centre Boundary Road/Station Road District Centre Mill Lane, Portslade Local Centre Portland Road, Hove Local Centre
Local Centres	‘The Grenadier’, Hangleton Road Richardson Road, Hove Eldred Avenue, Withdean Old London Road, Patcham Ladies Mile Road, Patcham Seven Dials, Brighton Fiveways, Brighton Hollingbury Place, Hollingdean Beaconsfield Road, Preston Park St George’s Road, Kemptown Warren Way, Woodingdean Whitehawk Road, Whitehawk High Street, Rottingdean Lustrell’s Vale, Saltdean Longridge Avenue, Saltdean

City Plan Part 2 Scoping Stage 2016

At the scoping stage of the City Plan Part Two the council explored through consultation

- Whether some of the city’s defined shopping centre ‘boundaries’ could either be expanded or reduced.
- Different approaches for setting more detailed ‘criteria based’ planning policies to manage the mix and balance of uses within the city’s shopping centres to ensure healthy and vibrant centres;

- Whether there were ‘special’ retail areas (e.g. the Lanes, the North Laine area, the Marina and the Seafront) that might need their own type of retail planning policy;
- If any additional new ‘local centres’ could be designated through CPP2;
- If some local shopping parades could be protected because they have an important neighbourhood value; and
- Whether there was scope for any additional permanent markets in the city.

As a result of consultation, the criteria-based policies in the retained Brighton & Hove Local Plan were reviewed and considered no longer relevant or out of date with regards to permitted development rights. Some of the wording of the policies was also considered to be ambiguous in interpretation by applicants, planning officers and planning inspectors. The review of these retail frontage policies was therefore considered appropriate considering national policy changes, changed local circumstances and the need for a streamlined set of clear, positively worded policies. The methodology that was followed for reviewing frontages is set out later in the Appendix 2 to this paper. The general approach to retail frontage policies in the draft CPP2 was also guided by the adopted City Plan Part 1 Policy CP4 Retail Provision, and the outcomes of the retail health checks. The council also took on board the consultation responses received at the scoping stage which stressed the importance of keeping frontages up to date, the need for a policy approach that sought to retain a certain proportion of retail uses in the defined primary and secondary frontages of shopping centres but perhaps in one streamlined policy rather than separated policies for each centre and the need to safeguard neighbourhood shopping provision.

Changes to policies following consultation on the Draft City Plan Part Two September 2018

Policy DM12 Change of use within Regional, Town, District and Local Shopping Centres

Policy DM12 received fifteen responses to the consultation on the Draft City Plan Part Two in 2018, with 9 comments in support and 6 objections.

Concerns related to

- Whether the policy was sufficient in supporting independent retailers
- The policy should attract a wider range of city centre uses (non-A1 uses) to reflect the changing nature of the high street and provide flexibility
- Criticism that the previous version of the shopping frontage review paper was to define the extent of frontages rather than to justify why non –retail uses should be limited in these locations.
- Concern around the inclusion of frontages given the new NPPF wording.
- Queries relating to Permitted Development Rights which allow the change of use of A1 units to other uses.
- The draft policy should be supportive of dual/mixed uses
- There should be increased protection of St James Street

To address the objections raised at the Draft consultation stage, further changes were made to policy DM12 for the Proposed Submission plan which are summarised below;

- The name of the policy was renamed from “Primary, Secondary and Local Centre Shopping Frontages” to “Changes of Use within Regional, Town, District and Local Shopping Centres” to better reflect the purpose of the policy and the changing wording of the NPPF.
- The wording of the policy was altered to allow the change of use of A1 to non-specific non-A1 uses providing that the criterion of the policy is met. This was thought to better reflect the changing nature of the high street and the NPPF.
- Simplification of policy wording to avoid duplication.
- Removal of the criteria seeking to avoid 3 or more non-A1 uses other than in Lanes and North Lanes to allow more flexibility for town centres uses other than A1 to open.
- The marketing requirement was reduced from 12 months to 6 months in primary, secondary frontages and local shopping centres to try and ensure that the policy allowed for some flexibility and that centres remained vibrant and viable with low vacancies.
- Clarification that residential uses would be permitted above units or to the rear of units in shopping centres.
- Changes to the Rottingdean High Street Local Centre to be in line with the draft Rottingdean Neighbourhood Plan proposals
- Consequential amendments to supporting text.
- Inclusion of text in the policy relating to ‘meanwhile’ uses in order to ensure that these uses activate and revitalise retail centres.

Policy DM12 was amended for the Proposed Submission City Plan Part Two to reflect the May 2019 changes to permitted development rights and to try and future proof the policy for potential further changes by referring to A1 uses and non-A1 uses. The policy amendments reflected that the PD rights at that point did not apply to changes of use within conservation areas (a large proportion of frontages within centres are in the city are within conservation areas). The wording of the amended policies supported the Prior Approval process which allowed consideration of the impact on adequate provision of services, sustainability of key shopping areas, noise, and transport. The amendments also reflected that some of the PD rights were for only a temporary (3 year) change of use.

Policy DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

Policy DM13 received fourteen responses to the consultation on the Draft City Plan Part Two in 2018, with 10 comments in support and 4 objections.

Concerns related to

- Suggestions that various shopping areas should be included as Important Local Parades
- That the policy did not reflect the changing nature of the high street supporting complementary uses and supporting dual/mixed uses.
- Clarification that Important local parades often provide specialist retailers

To address the objections raised at the Draft CPP2 consultation stage, further changes were made to policy DM13 for the Proposed Submission plan which are summarised below.

- Preston Drove near Preston Park was added to the list of Important Local Parades in the policy
- The wording for residential uses was clarified and changed to explain that residential use would be permitted to the rear or on the upper floors in Important Local Parades.
- Text was added to show support for temporary and meanwhile use of vacant buildings to help activate and revitalise parades.

Policy DM14 Commercial and Leisure Uses at Brighton Marina

Policy DM14 received 12 representations, with 8 in support and 4 objections. Supporting comments recognised that the policy enhanced the retail offer and sought to improve and enhance a currently blighted area. Concerns centred around;

- the policy should remove criteria A and D1 uses in criteria D,
- the policy should consider accessibility via public transport and by foot.
- the policy should reconsider the status of retail over other uses such as services/offices
- ground floor residential should be included as a positive inclusion.

To address the objections raised at the Draft CPP2 consultation stage, further changes were made to policy DM14 for the Proposed Submission Plan which are summarised below.

- The text was altered to state that residential will be permitted on upper floors.
- The policy was renamed to say “Commercial and Leisure Uses at Brighton Marina”
- Policy was altered to state that Brighton Marina is no longer designated as a shopping centre in the retail hierarchy and therefore any proposals for additional retail development not allocated by policy DA2 in City Plan Part One will need to meet the tests of policy CP4 and the National Planning Policy Framework to ensure there are no adverse impacts on designated centres.
- The wording of the policy has been broadened to welcome other uses such as offices provided the use could improve the vitality and viability
- Removed reference to banks and post offices in supporting text

Policy DM15 Commercial and Leisure Uses on the Seafront

Policy DM15 received 10 representations, with 2 comments in support and 8 representations raising objections. Concerns related to;

- No recognition of Hove Lawns section of seafront as a heritage asset that should be protected from development.
- Policy should support innovative, yet practical, winter needs and uses.
- Concern for state of the lower seafront to the east of Palace Pier.
- Concern about the retention of the arches and structure if new developments obscured sea views or negatively impacted the amenities of locals

- Add extra criteria so cycling/cyclists will not be impeded by activities on the seafront.

It was felt that no major changes to the policy were required as a result of the comments received.

Changes to City Plan Part Two Policies following consultation on the Proposed Submission Plan 2020 and Government Changes to the Use Classes Order.

Policy DM12 Change of use within Regional, Town, District and Local Shopping Centres

Policy DM12 received 8 representations at the proposed submission consultation with one representation in support and most of the remaining representations objecting to the wording of the policy in term of its compliance with the Use Classes Order. The timing of approval at full council in April 2020 preceded the changes to the Use Classes Order in September 2020 and meant that the wording of the policy was unchanged for the consultation.

Proposed changes to the retail policies have been drafted and will be submitted alongside the City Plan Part Two for the Inspector to consider during the examination of the Plan⁹. These changes update the scope of the policies to address the changes to the Use Classes Order. The resulting proposed policy wording:

- Provides greater flexibility and addresses the changes to the Use Classes and permitted development rights as it no longer seeks to retain a certain proportion of different uses within the primary and secondary frontages.
- Provides a positive and supportive approach for all E class uses, F1 and F2 uses within designated centres and other uses which will help to maintain vitality, viability and footfall and help to reduce vacancies which may be amplified by the Covid-19 pandemic. The policy no longer distinguishes between what are suitable uses within primary and secondary frontages
- Allows for temporary or meanwhile uses, which may also help to prevent vacancies and helps to make good use of sites available.
- Requires consideration of amenity impacts, which is considered to strengthen the policy and should help to avoid adverse amenity impacts such as noise and light pollution;
- the policy recognises the importance of smaller premises in providing improved choice for business location and affordability particularly for independent retailers.
- Seeks to maintain the unique/niche/independent retailers in the Lanes and the North Laine as well as the supply of smaller units, the policy sets out that changes of use should not result in the amalgamation of three or more consecutive numbered units in order to create a larger unit.
- Makes a clear link to the policy on shop front design and the need to retain an active street frontage/use, which should help to ensure the character of the city's

⁹ Schedule of Proposed main and minor changes to the City Plan Part 2

shopping areas is maintained or enhanced with particular requirements relating to the North Laine and Lanes which would protect the character of these areas. .

Policy DM13 Important Local Parades, Neighbourhood Parades and Individual Shop Units

Policy DM13 received 8 representations at the proposed submission consultation with one representation in support and most of the remaining representations objecting to the wording of the policy in terms of its compliance with the Use Classes Order. The timing of approval at full council in April 2020 preceded the changes to the Use Classes Order in September 2020 and meant that the wording of the policy was unchanged for the consultation.

Proposed changes to the retail policies have been drafted and will be submitted alongside the City Plan Part Two for the Inspector to consider during the examination of the Plan¹⁰. These changes update the scope of the policies to address the changes to the Use Classes Order.

The policy designates ten areas as Important Local Parades (ILPs); these are generally located within residential areas and are an important source of service provision which serve their locality. Amendments to the policy to reflect the new use class order means the policy is no longer able to seek a proportion of different uses and is only able to support all use within the E use class within the ILPs. This flexibility however may help to reduce vacancies and may help to make the best use of the units. In addition, the policy allows temporary or meanwhile uses, again helping to make the most of the available units.

The policy no longer has any requirements relating to Neighbourhood Parades and Individual Shops. The policy previously only permitted change of use from a shop if there was similar provision within 300m. The Use Classes Order now classifies individual shops as Local Community Uses if (i) the shop's premises cover an area not more than 280 metres square, and (ii) there is no other such facility within 1000 metre radius of the shop's location. The local parades section of the policy was to protect the retail function of parades. However, since the introduction of the changes to the Use Classes Order it is felt that it would be inappropriate to retain this part of the policy as the new E Use Class covers a wider range of types of uses.

The policy also now makes a clear link to the policy on shop front design, which should help to ensure any character is maintained or enhanced in Important Local Parades.

Policy DM14 Commercial and Leisure Uses at Brighton Marina

Policy DM14 received 7 representations at the proposed submission consultation with two representations in support. Five soundness objections related to various concerns but particularly that the policy did not align with the new changes to the Use Classes Order and concern over the shopfront criteria in the policy. Other objections were felt to be outside the remit of the policy and related to issues set out in DA2 of the City Plan Part One.

¹⁰ Schedule of Proposed main and minor changes to the City Plan Part 2

Amendments have been made to the policy to clarify that the policy relates to uses within the Brighton Marina Inner Harbour area and that E use classes and local community uses (F2 use class) will be supported here. Criteria c) which related to retaining a window display has been altered to state that the proposal will retain an active ground floor use and frontage and provide a direct service or sales to visiting members of the public. A new criterion has been added to ensure that proposed uses would not have a harmful impact on amenity due to noise, odour, disturbance, or light pollution.

Policy DM15 Commercial and Leisure Uses on the Seafront

Policy DM15 received 5 representations at the proposed submission consultation with 3 in support and two representations raising soundness concerns. The two objections related to compliance of the policy with the new use classes order and a need for mentioning the importance of Madeira Drive.

Amendments have been made to the policy to clarify the types of uses accepted on the seafront in line with the new use classes order changes.

Appendix 1 Health Check Context

Retail Study 2011

The Brighton & Hove Retail Study Update (2011) reviewed the vitality and viability of each of the shopping centres. Since its publication, the council has continued to assess the health of its shopping centres biannually. The study suggested put forward the following recommendations to the council

“Existing policies relating to designated retail frontages and restricting the uses along retail frontages to a quantifiable percentage should be replaced by more flexible policies that restrict non retail uses in line with PPS4, where they may impact the vitality and viability of a centre.

We recommend that, while B&HCC should determine applications on their own merits, and on a case by case basis, they should resist applications for changes of use that result in the loss of A1 retail within prime retail areas where they have an impact on the vitality and viability of the centre.”

City Plan Part One – Adopted March 2016

In City Plan Part One, Policy CP4 Retail Provision identifies and classifies the City’s Regional, Town, District and Local centres. The supporting text to the policy (para 4.43) is clear that detailed policies regarding the appropriate mix of A1 and non-A1 uses in these centres will be set out in Part 2 of the City Plan. Para 4.45 iterates the importance of a balanced network of local centres to facilitate access to food produce and key services on foot or by public transport is addressed in the policy SA6 Sustainable Neighbourhoods. Other relevant policies include policy DA1 Brighton Centre and Churchill Square Area which allocates a minimum of 20,000 sqm comparison floorspace and policy DA2 Brighton Marina and Black Rock Area which allocated 5,000 sqm retail (A1-A5) floorspace.

Appendix 2 Health Check Methodology

City Plan Part Two Retail Policies Approach

A review of the boundaries of Primary and Secondary frontages was undertaken in 2017 as part of the health check monitoring of defined centres. The Scoping stage consultation on the CPP2 suggested that there was broad support for amending or removing some less successful sections of defined shopping frontage from designated shopping centres.

To assist with the review of the frontages as part of City Plan Part 2 health checks were undertaken in 2017 in all shopping centres in the City as well as potential Important Local Parades. A comparison was made to the previous retail health check surveys undertaken in 2015/2016.

This review included the following assessments;

- An up-to-date retail health check of the centre's frontages, recording use classes and vacancies
- A comparison of the 2015/2016 and 2017 retail health checks data against the current Local Plan 2005 policy requirements,
- An assessment of whether any units should be deleted from or added to the frontages
- An assessment of whether any units should be changed from primary to secondary or secondary to primary frontage
- An assessment of the percentage of retail provision required in each of the centres and;
- A comparison of the suggested changes to the designated shopping centre frontages against the suggested City Plan Part Two retail policy provision percentage

A total of 22 existing designated shopping centres were surveyed in September and October of 2017. In addition to the survey an assessment of 34 potential Important Retail Parades was undertaken in May and June of 2017. This list of potential important retail parades was scoped from desktop surveys and local knowledge. Existing designated retail frontage surveys were carried out by officers who walked each shopping centre's retail frontage and recorded changes against the previous survey results. The survey recorded the use of units in the primary and secondary frontage including the name of the unit and its primary activity.

A survey of shopping parades in the City was also carried out to assess if they serve purely a neighbourhood function or whether their role had changed to the extent they should be designated as local centres. The associated assessment and designation of Important Retail Parades from these surveys undertaken of the shopping parades in the City is discussed in more detail later in this paper.

Units were identified by use class and operator name and labelled on a map base. Notes were also recorded to describe the service being offered along with vacant units. This approach allowed the council to identify the uses currently occupying the ground floor

units within each frontage. The uses were classified according to the Uses Classes Order as at 25th May 2019 shown in the following table:

Use Class (as at 25 th May 2019)	Indicative Types of Use
Class A1	Shops, retail warehouses, post offices, ticket and travel agencies, sale of cold food for consumption off premises, hairdressers, funeral directors, hire shops, dry cleaners, internet cafes
Class A2	Banks, building societies, estate and employment agencies, professional services (not health or medical services)
Class A3	Restaurants and cafes
Class A4	Public houses, wine bars or other drinking establishments
Class A5	For the sale of hot food for consumption off the premises
Class B1	a. Office other than a use within Class A2 b. Research and development of products or processes c. For any industrial process (which can be carried out in any residential area without causing detriment to the amenity of the area)
Class B2	Industrial process other than that falling within Class B1
Class C3	Uses as a dwellinghouse (whether or not as main residence) by: A single person or by people to be regarded as forming a single household Not more than 6 residents living together as a single household where care is provided for residents; or Not more than 6 residents living together as a single household where no care is provided to residents (other than use within Class C4)
Class D1	Clinics, health centres, creches, day nurseries, schools, non-residential education and training centres, museums, public libraries, public halls, exhibition halls, places of worship, law courts
Class D2	Cinemas, concert halls, bingo halls, dance halls, swimming baths, skating rinks, gymnasiums, other areas for indoor and outdoor sports or recreations not involving motorised vehicles or firearms
Class SG	Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: Includes theatres, large HMO (more than 6 people sharing), hostels, petrol filling stations, shops selling and/or displaying motor vehicles, scrap yards, retail warehouse clubs, nightclubs, launderettes, taxi or vehicle hire businesses, amusement centres, casinos, funfairs, waste disposal installations, betting offices, pay day loan shops

The data collected from the surveys was used to update the use class and physical location of shop units on the existing GIS map of the city. A 'unit' was taken as the floorspace occupied by one retailer or business, irrespective of whether this covered one or more individual shop front. This information was then captured on the Council's GIS system in order to allow for analysis to be undertaken.

To establish where the boundaries for each of the primary and secondary frontages should be drawn, a plan of the shopping centre was created.

Deletions to the retail frontages were considered where units were felt to be fragmented from the rest of the centre, or where there were concentrations of residential units breaking up the shopping frontage.

Additions to the retail frontages were considered where new developments had created extra units and now formed an active frontage to include within an existing shopping centre. Areas where the predominance of town centre uses (particularly retail units) had increased in certain areas (which were not designated previously) were added where it was considered that the unit(s) would add to the vitality and viability of the centre.

The recommended changes to the adopted Local Plan 2005 retail shopping centre designations are set out in more detail below.

Understanding the current composition of retail to non-retail units within the centre enabled an analysis of the percentage of retail provision to be reconsidered and updated for each type of retail centre. Draft CPP2 Policies DM12 and DM13 set out the percentage of retail provision which should be retained in each of the City's shopping centres but can be summarised as follows;

Shopping Centre	Defined Centres	Recommended A1 Use Class Retention for Primary Shopping Frontages (PSFs) and Secondary Shopping Frontages (SSFs)
Brighton Regional Centre		It is recommended that PSF should aim to maintain 75% of A1 uses and SSF should aim to maintain 35% of A1 uses
Town Centres	Hove & London Road	It is recommended that PSF should aim to maintain 50% of A1 uses and SSF should aim to maintain 30% of A1 uses
District Centres	St James's Street Lewes Road Boundary Road/Station Road	It is recommended that the centre should aim to maintain 50% of A1 uses
Local Centres	Mill Lane, Portslade Portland Road, Hove 'The Grenadier', Hangleton Road Richardson Road, Hove Eldred Avenue, Withdean Old London Road, Patcham Ladies Mile Road, Patcham Seven Dials Fiveways Hollingbury Place, Hollingdean Beaconsfield Road, Preston Park	It is recommended that the centre should aim to maintain 50% of A1 uses

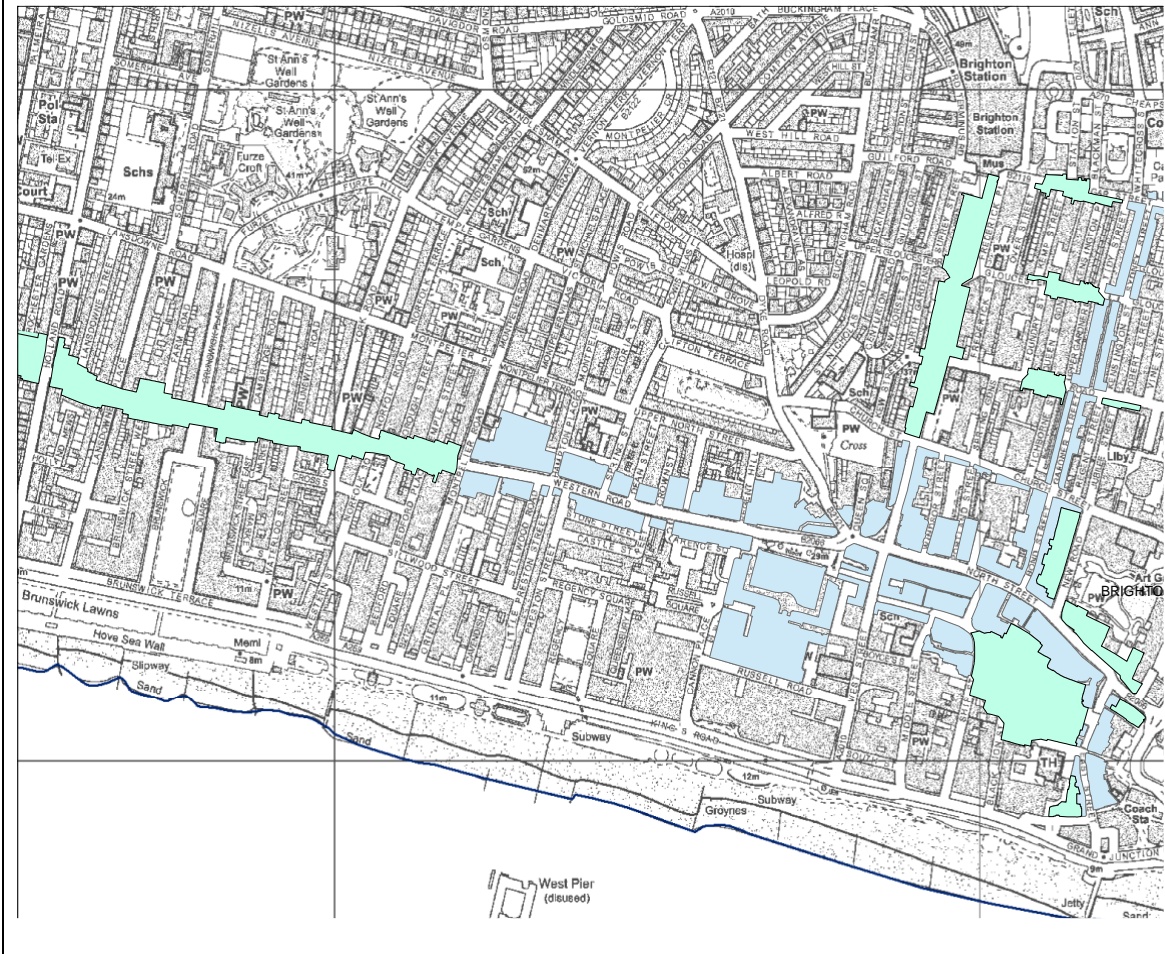
Shopping Centre	Defined Centres	Recommended A1 Use Class Retention for Primary Shopping Frontages (PSFs) and Secondary Shopping Frontages (SSFs)
	St George's Road, Kemptown Warren Way, Woodingdean Whitehawk Road, Whitehawk High Street, Rottingdean Lustrell's Vale, Saltdean Longridge Avenue, Saltdean & Brunswick Town, Hoe	
Important Retail Parades	Goldstone Villas, Hove Hove Park Villas, Hove Woodland Parade Hove Valley Road, Portslade Old Shoreham Road/Sackville Road, Hove Victoria Terrace, Hove Islingword Road, Brighton Warren Road, Woodingdean and Colwey Drive, Woodingdean	It is recommended that the Important Retail Parade should aim to maintain 50% of A1 uses

The following section outlines the proposed additions and deletions to each centre.

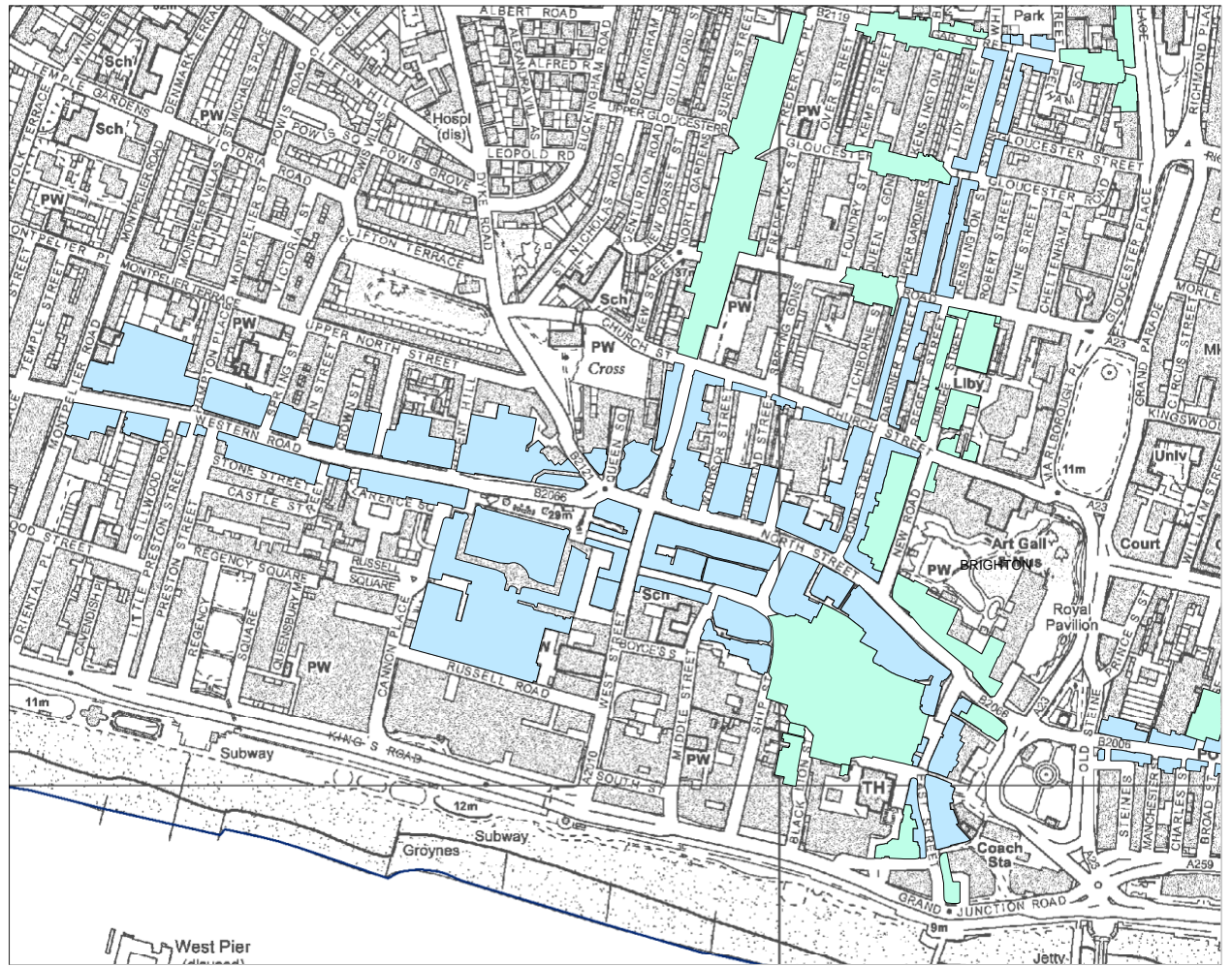
Regional Centre Assessment

(Key - Light Blue = Primary Frontage, Light Green = Secondary Frontage)

Current Regional Centre Frontages (as shown on the Policies Map)



Proposed Regional Centre Frontages (as shown on the draft CPP2 Policies Map)



Regional Centre: Proposed Changes:

Deletions	Additions	Frontage change
<p>Primary Frontage</p> <ul style="list-style-type: none"> - Rear of 2 Western Terrace (<i>dwelling</i>) - 2 Pelham Street (<i>dwelling</i>) <p>Secondary Frontage</p> <ul style="list-style-type: none"> - Foyer Pelham Street - 35, 35a, 36, and 37 North Road (<i>dwelling</i>s) - 9a, 9b, 9c, 9d, 9e and 9F Little Western Street (<i>dwelling</i>s) 	<p>Primary Frontage</p> <ul style="list-style-type: none"> - 87 to 88 Trafalgar Street (A3) - 32 West Street (office) - 33 West Street (A2) - 24 Gloucester Road (A1) <p>Secondary Frontage</p> <ul style="list-style-type: none"> - 1 to 17 Jubilee Street (new units) - 77 to 82 Trafalgar Street (new units) - 24 Gloucester Road (A1) - 8 to 15 Black Lion Street (new units) - 10 Bartholomew Square (A3) - 1 Church Street (A4) - 25 to 29 New Road (Dome etc) - 75 to 80 East Street (A3s) - 109-116 Church Street (A3s etc) 	<p>Secondary to Local Centre</p> <ul style="list-style-type: none"> - Brunswick Town <p>Centre Change</p> <ul style="list-style-type: none"> - 16 -17 St Georges Place Change from Regional Secondary Frontage to London Road Secondary Frontage (A5)

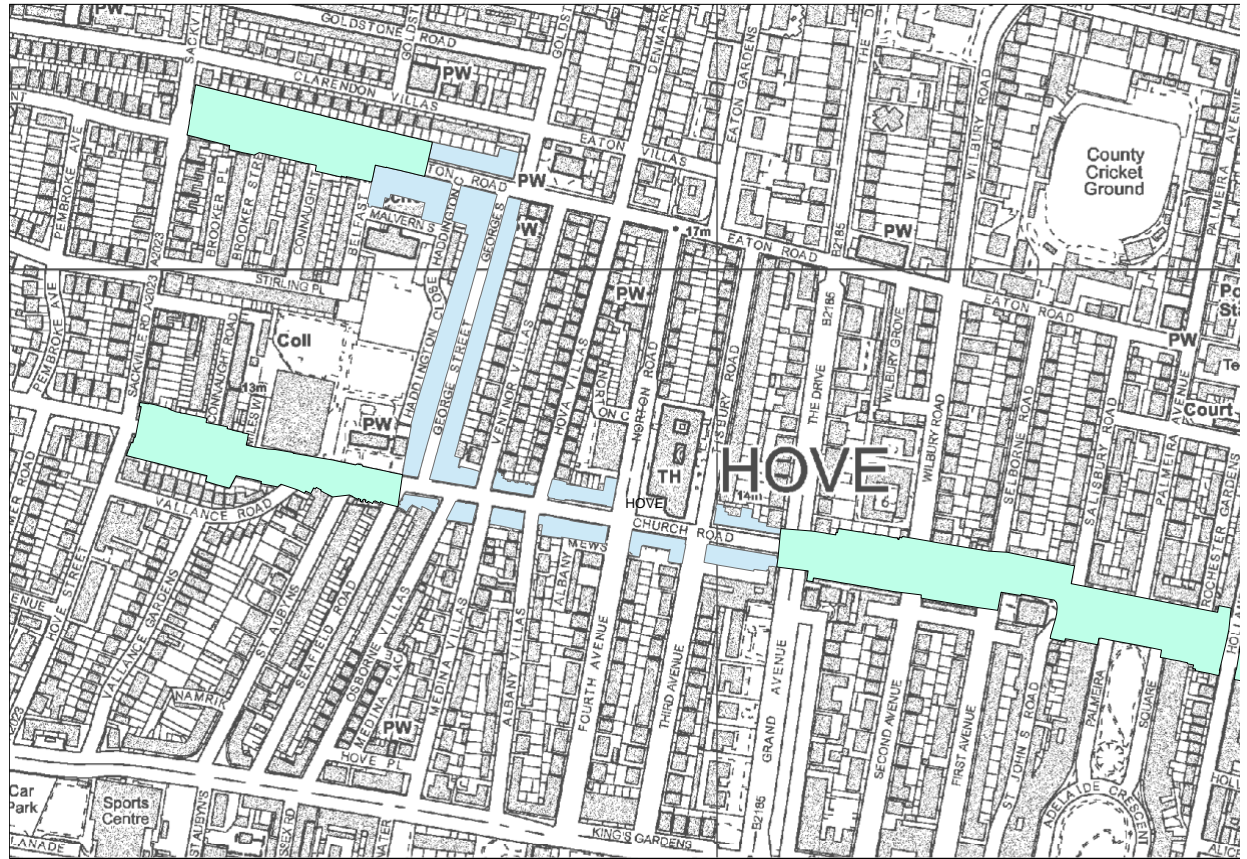
Summary: The proposed changes to the Regional Centre reflect the additional units built in new developments such as Trafalgar Street and Jubilee Street Brighton since the adoption of the Local Plan in 2005. Some frontage has been readjusted to be placed within other centres such as the new Brunswick Town Local Centre. As at 2018/19 the health check of the Regional Centre with the proposed changes, shows that whilst some streets in the centre have experienced higher vacancy rates. Some of this change can be attributed to units relocating to the new Hanningtons Lane development at North Street and Brighton Square, whilst other change has been bought about by national store closures. Overall as at 2018/19 the vacancy rate for the Regional Centre was 9%, which is still below the national average for vacancies.

Town Centres Assessment

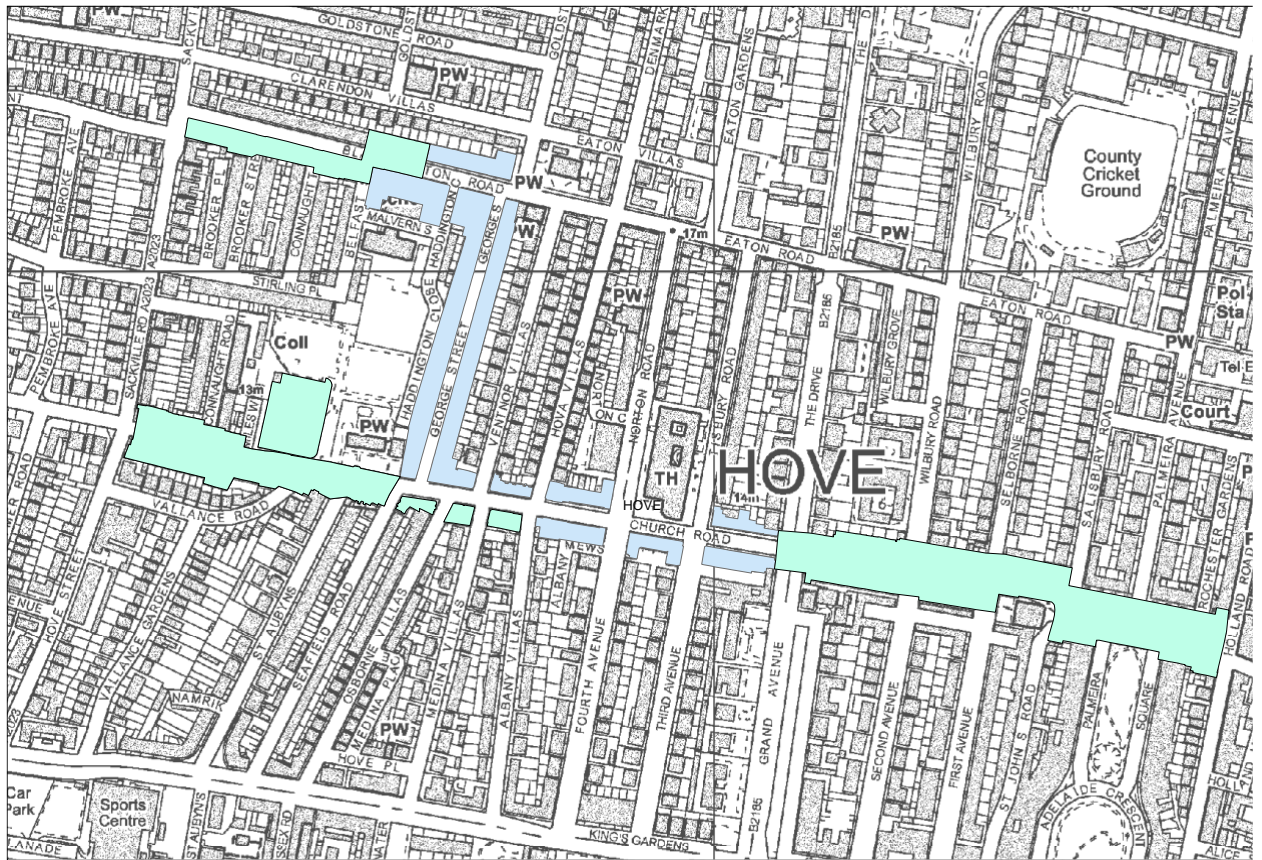
(Key - Light Blue = Primary Frontage, Light Green = Secondary Frontage)

Hove

Current Hove Town Centre Frontages (as shown on the Policies Map)



Proposed Hove Town Centre Frontages (as shown on the draft CPP2 Policies Map)



Proposed Changes: Hove Town Centre

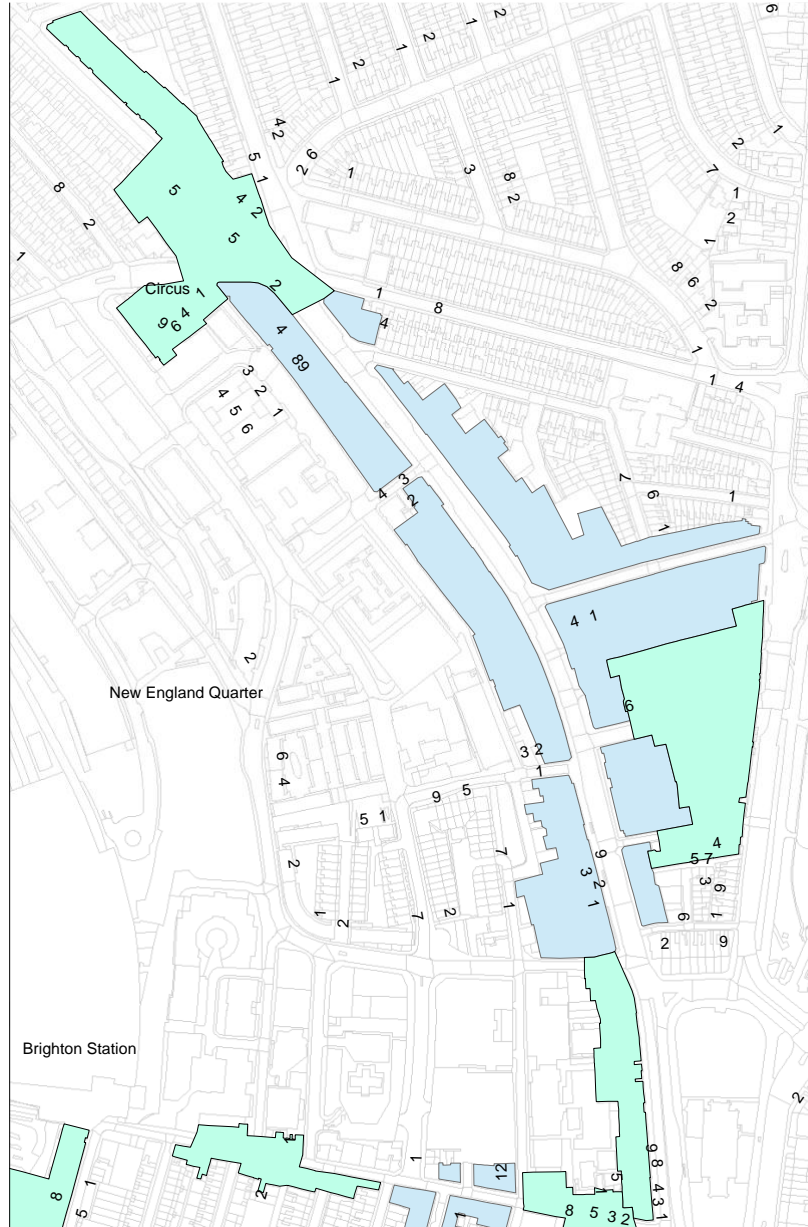
Deletions	Frontage change
<p>Secondary Frontage</p> <ul style="list-style-type: none"> - 65 & 65A Sackville Road (<i>estate agent and hairdressers but completely separate from rest of retail offer</i>) - 1 to 63 Blatchington Road (<i>predominately dwellings</i>) 	<p>Primary to Secondary</p> <ul style="list-style-type: none"> - 146 to 116a Church Road (<i>this side of the road has decreased its offer</i>)

Summary: The changes proposed for Hove Town Centre reflect the decline in active frontages along the northern side of Blatchington Road which are predominately occupied by residential dwellings. There has also been a switch from primary to secondary frontage on a section of Church Road which has decreased its offer in terms of retail premises over recent years.

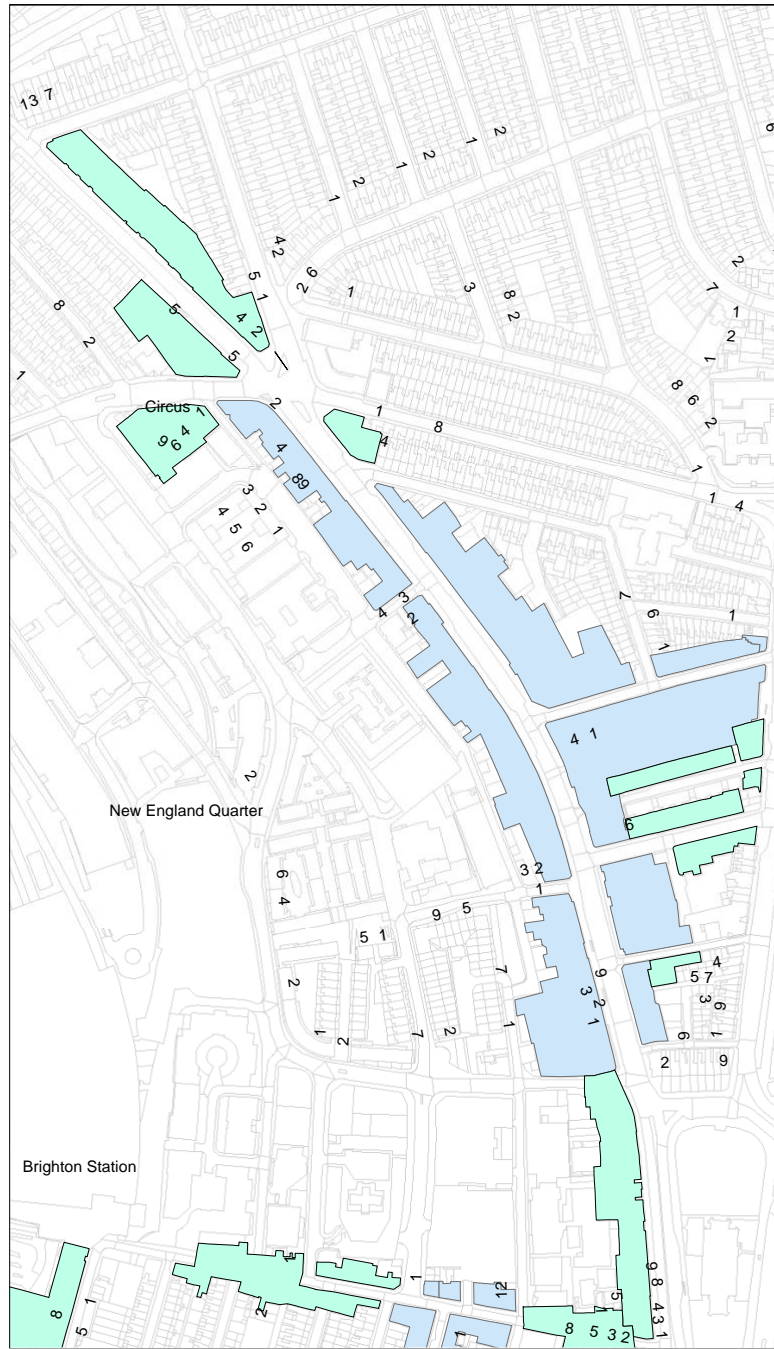
The latest 2018/19 healthcheck for Hove Town Centre shows that vacancy levels in the proposed new centre boundary are very low at just 4% maintaining a good mix of uses including a predominance of A1 retail in the primary frontage at 68%.

London Road

Current London Road Town Centre Frontages (as shown on Policies Map)



Proposed London Road Town Centre Frontages (as shown on the draft CPP2 Policies Map)



Proposed Changes: London Road Town Centre		
Deletions	Additions	Frontage change
<p>Primary Frontage</p> <ul style="list-style-type: none"> - Any residential properties fronting Providence Place and Elder Place which are at the rear of units within London Road Town Centre designation - 12 Baker Street (<i>entrance to student accommodation</i>) <p>Secondary Frontage</p> <ul style="list-style-type: none"> - 1, 2, 3, 4, 10 & 11 Brunswick Row - Southern side of Francis Street - 19, 21, 23, 25, 27-33, 35, 37, 39, 41, 43, 45, 47, 53, 55 & 57 Ditchling Road - 14, 14a - 16 Oxford Place 	<p>Primary Frontage</p> <ul style="list-style-type: none"> - 83 Ditchling Road (A1) <p>Secondary Frontage</p> <ul style="list-style-type: none"> - 10, 11, 12, 13, 14, & 15 St Georges Place (shops) 	<p>Centre Change</p> <ul style="list-style-type: none"> - 16 -17 St Georges Place Change to London Road Secondary Frontage from Regional Secondary Frontage <p>Primary to Secondary</p> <ul style="list-style-type: none"> - 75 to 77B London Road

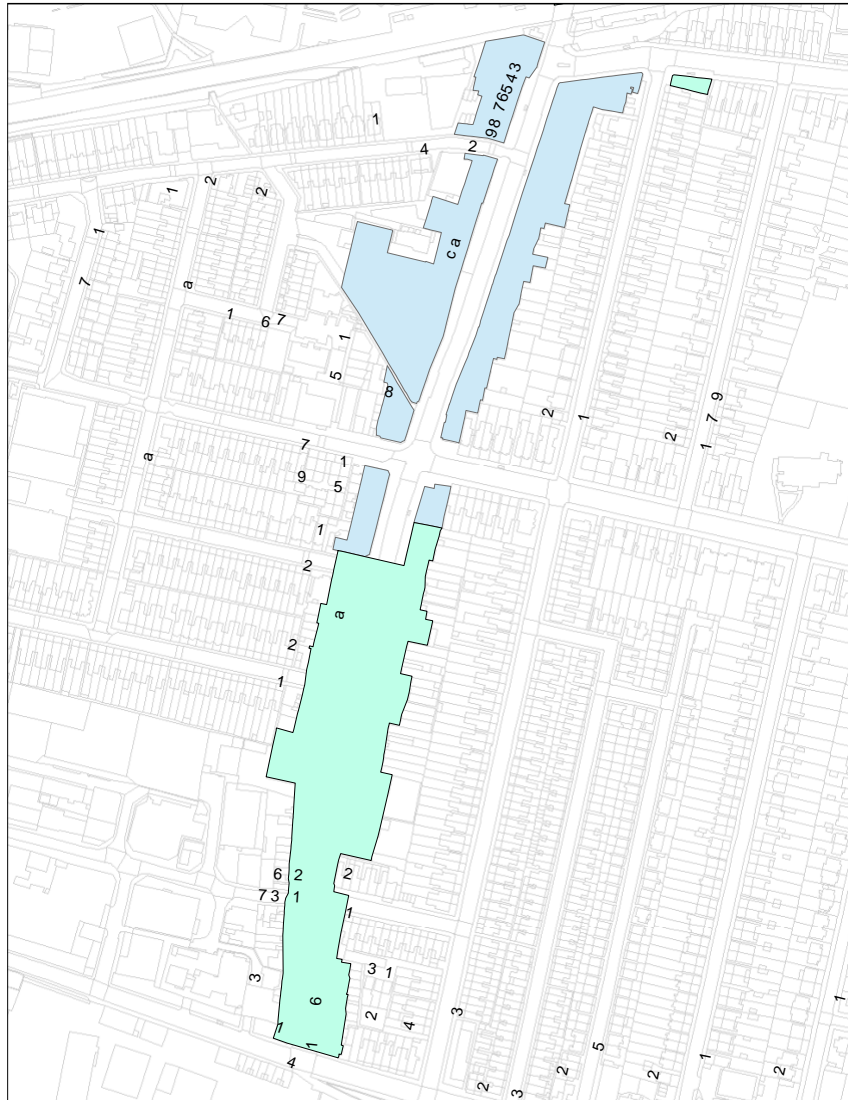
Summary: Residential units fronting Providence Place have been proposed to be removed in London Road Town Centre. Other sections of frontage proposed to be removed are from areas of the centre with decreased footfall and fragmented retail frontages such as Brunswick Row, Francis Street, Ditchling Road and Oxford Place. Other changes made to the centre involve the inclusion of some units along St George's Place which has previously been excluded from the centre. The latest 2018/19 health check of London Road shows that the centre is faring well in terms of vacancies with just 8% despite the vacation of some multiple retailers from the centre in the last 2 years such as Maplins. The proposed primary frontage has 60% of units being in A1 use which illustrates the popularity of the centre.

District Centres

(Key - Light Blue = Primary Frontage, Light Green = Secondary Frontage)

Boundary Road/Station Road District Centre

**Current Boundary Road/Station Road District Centre Frontages
(as shown on Policies Map)**



**Proposed Boundary Road/Station Road District Centre Frontages
(as shown on the draft CPP2 Policies Map)**



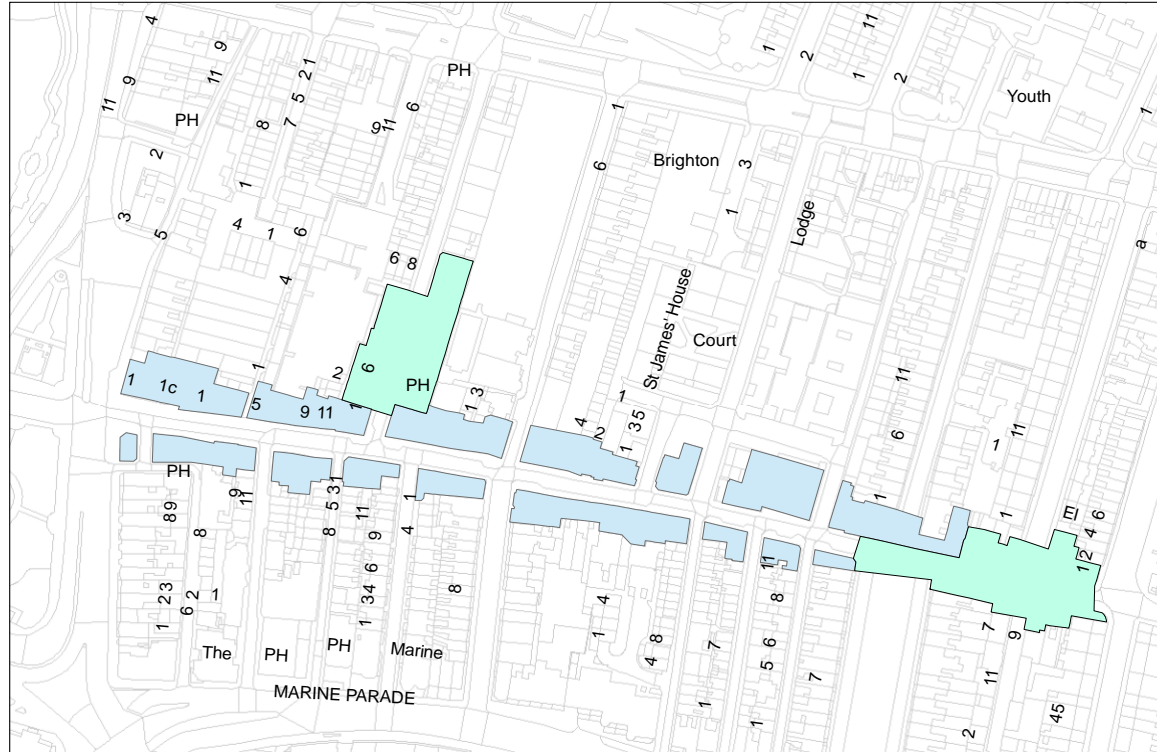
Proposed Changes Boundary Road /Station Road District Centre		
Deletions	Additions	Frontage change
<p>Primary Frontage</p> <ul style="list-style-type: none"> - Unit 3 Vale Road - Units to rear of 30 Station Road <i>(not in main shopping street)</i> <p>Secondary Frontage</p> <ul style="list-style-type: none"> - 3 to 19 Victoria Road <i>(mainly residential)</i> 	<p>Secondary Frontage</p> <ul style="list-style-type: none"> - 14-15 Carlton Terrace <i>(newly built unit since local plan)</i> - 94-100 Boundary Road <i>(mix of units newer included in the frontage)</i> 	<p>Primary to Secondary</p> <ul style="list-style-type: none"> - 44 to 36 Station Road - 53 Boundary Road - 54 Boundary Road - 55 Boundary Road <i>(aside from post office rest of frontage peripheral to primary frontage with less footfall)</i>

Proposed Changes Boundary Road /Station Road District Centre		
Deletions	Additions	Frontage change
<ul style="list-style-type: none"> - 428 to 420 Portland Road (<i>peripheral units to centre</i>) - Portslade United Reformed Church, St Aubyns Road (<i>peripheral to centre</i>) - 59 to 87 Station Road - 1 Wellington Road - 1 to 17 Boundary Road (<i>Peripheral units to centre and large amount of residential</i>) 		

Summary: Stretches of residential units in the centre have been proposed to be removed from the current frontage of the District Centre, most notably units along Victoria Road and at the southern end of Boundary Road / Station Road. There have also been some redesignation of parts of frontages from primary to secondary frontage in the central part of the centre as well as some additional units that were previously excluded in Carlton Terrace and Boundary Road. The 2018/19 health check with the proposed boundary changes to the centre increase the predominance of A1 retail to 59% in the centre and 64% in the primary frontage. Vacancies in the centre are generally a little higher than other retail centres at approximately 12% for the whole centre with the majority of these being within the secondary frontage.

St James's Street District Centre

Current St James's Street District Centre Frontages (as shown on Policies Map)



Proposed St James's Street District Centre Frontages (as shown on the draft CPP2 Policies Map)



Proposed Changes: St James's Street District Centre

Additions

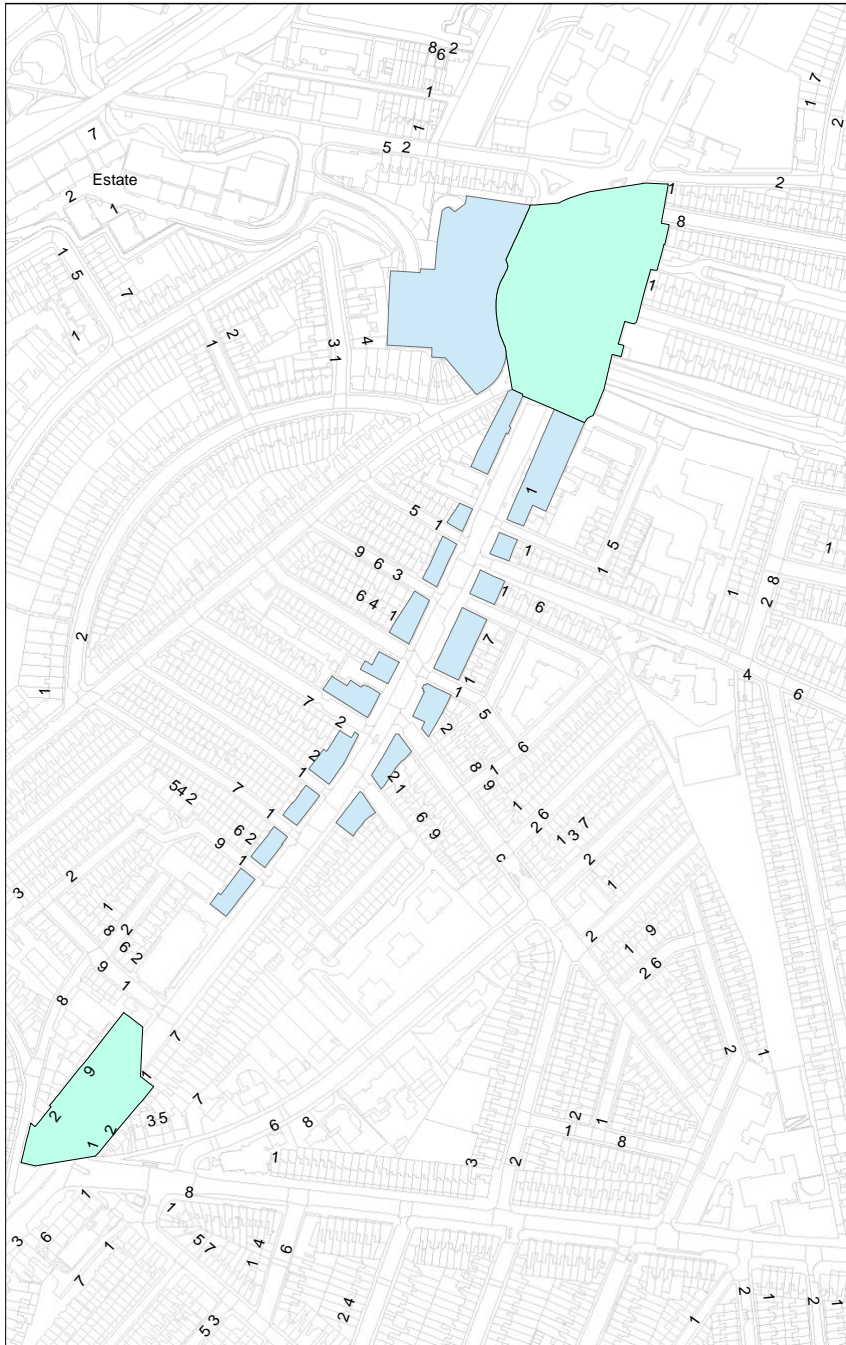
Secondary Frontage

44 & 44a George Street (town centre uses not currently included)

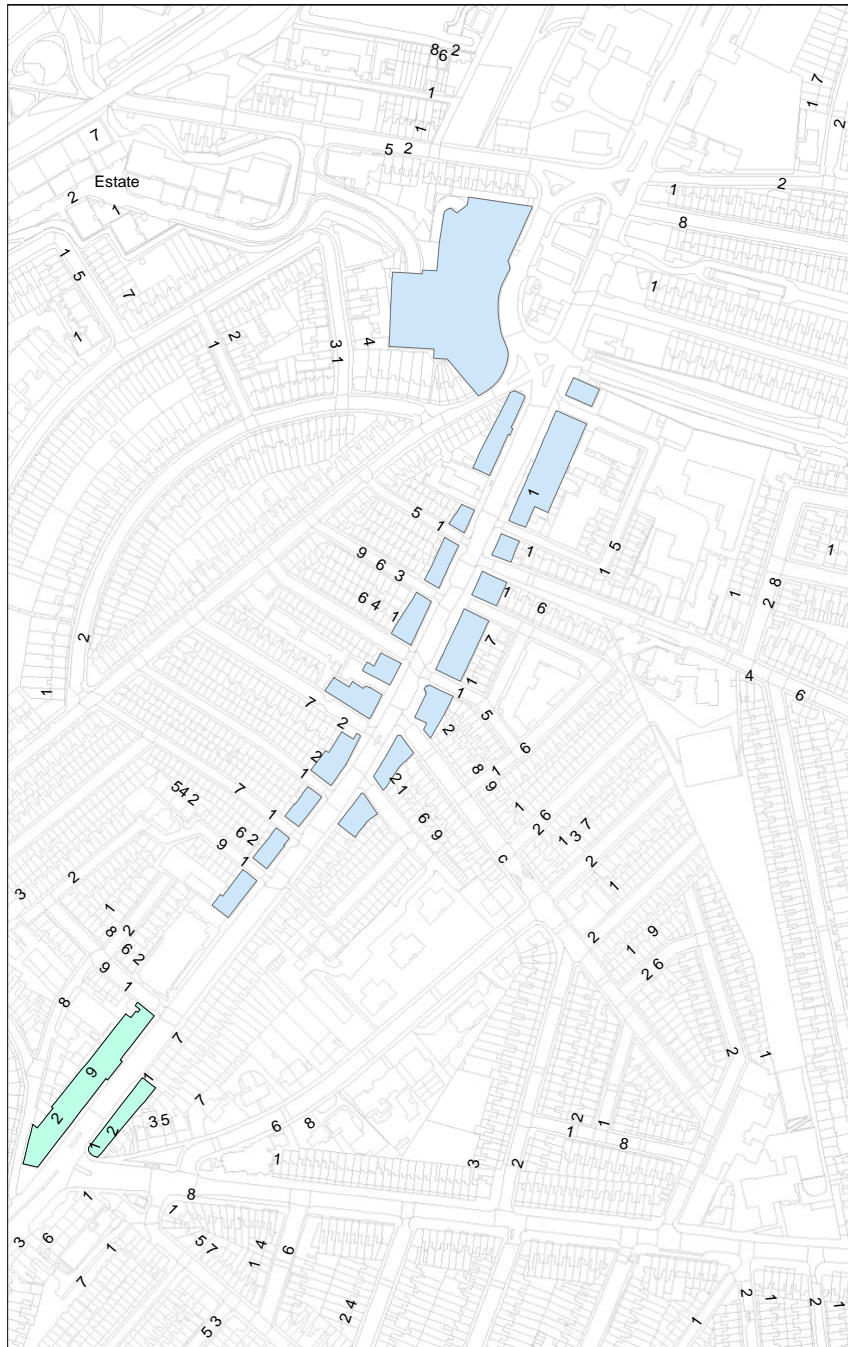
Summary: Small changes are proposed to the St James's Street District Centre to include two units in the secondary frontage of George Street. The 2018/19 health check of the centre shows a 55% predominance of A1 retail in the centre which peaks to 59% in the primary frontage. Overall the centre is faring well with vacancies at just 6%.

Lewes Road District Centre

Current Lewes Road District Centre Frontages (as shown on Policies Map)



Proposed Lewes Road District Centre Frontages (as shown on the draft CPP2 Policies Map)



Proposed Changes: Lewes Road District Centre

Deletions	Additions	Frontage change
Secondary Frontage - 94 Lewes Road - 95 Lewes Road - 96 Lewes Road - 97-104 Lewes Road - 106 Lewes Road	Secondary Frontage - 18 to 19 Lewes Road <i>(funeral directors unit currently excluded from any frontage)</i>	Secondary to Primary - 123C Lewes Road <i>(large fronted unit offering potential for footfall to rest of centre)</i>

Proposed Changes: Lewes Road District Centre		
Deletions	Additions	Frontage change
<ul style="list-style-type: none"> - 110 to 111 Lewes Road - 120 to 122 Lewes road - 123 Lewes Road <i>(units felt to be peripheral to rest of centre interspersed with student accommodation)</i> 		

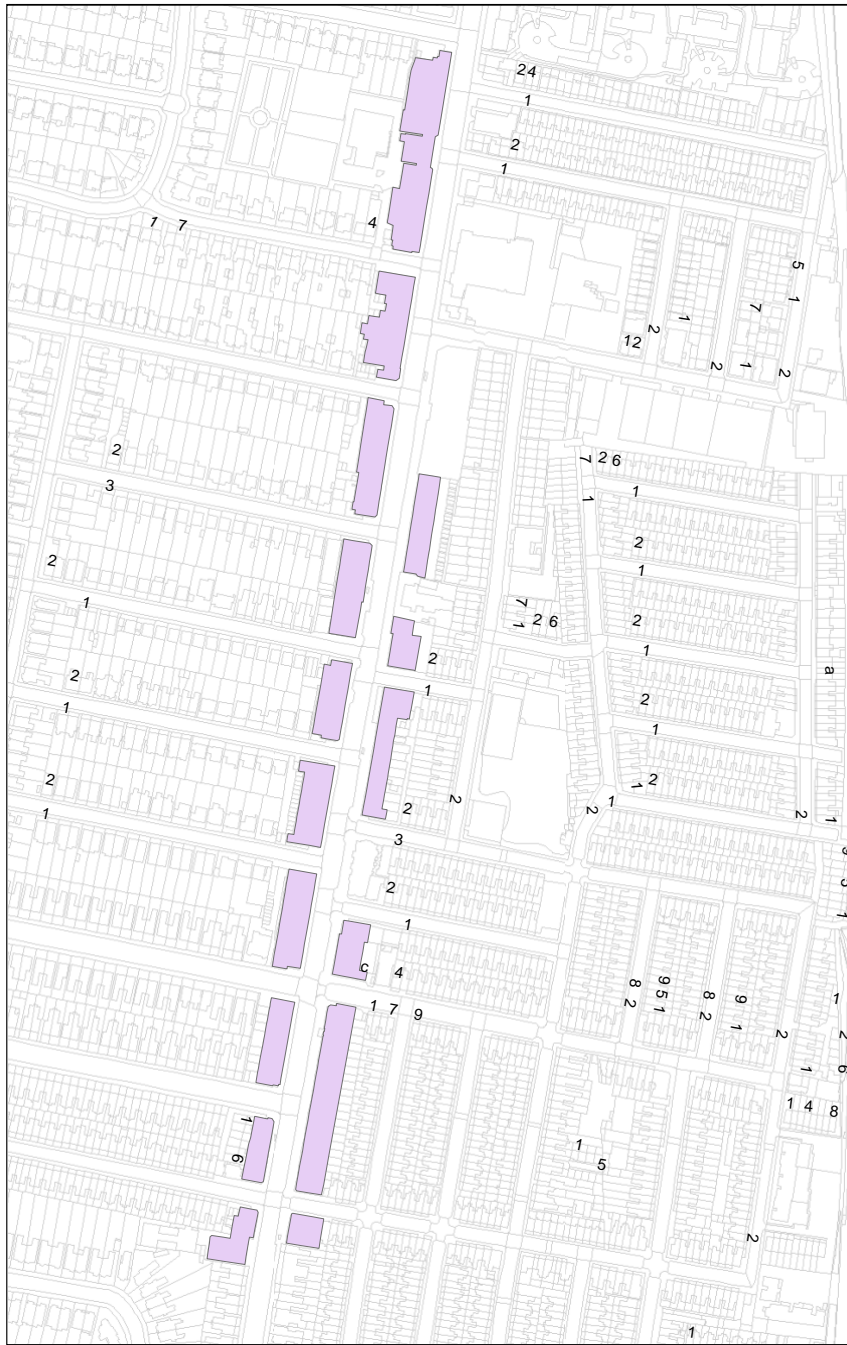
Summary: Units to the north of the Lewes Road District Centre are proposed to be removed due to their peripheral nature and lack of contiguous frontage. Overall the 2018/19 healthcheck shows that there are approximately 6% vacancies in the centre. The proportion of A1 retail in the primary frontage of the centre is currently at 49% and this is an improvement upon 2017 figures of 46%.

Local Centres
Portland Road, Hove

Current Portland Road Local Centre Frontages (as shown on Policies Map)



Proposed Portland Road Local Centre Frontages (as shown on the draft CPP2 Policies Map)



Proposed Changes to Portland Road Local Centre

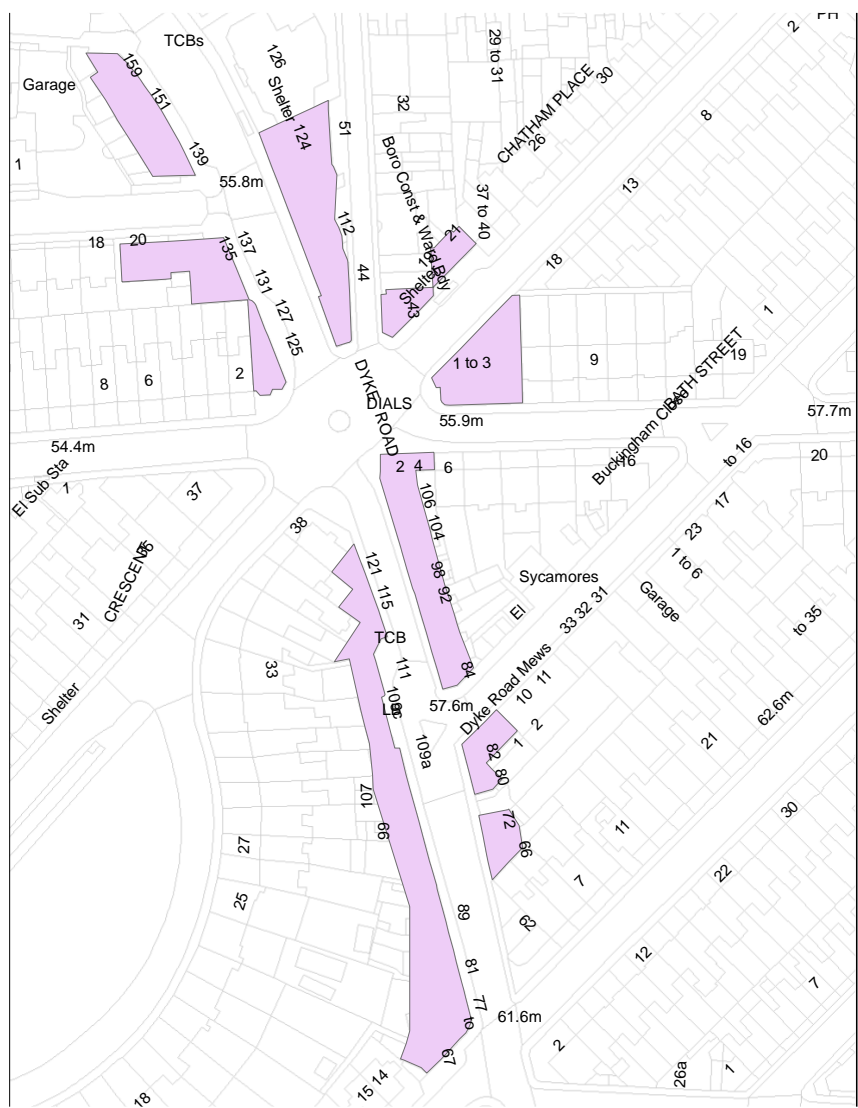
Additions

- 167 – 185 Portland Road
 - 208 – 288 Portland Road
- (good mix of units to include in centre)*

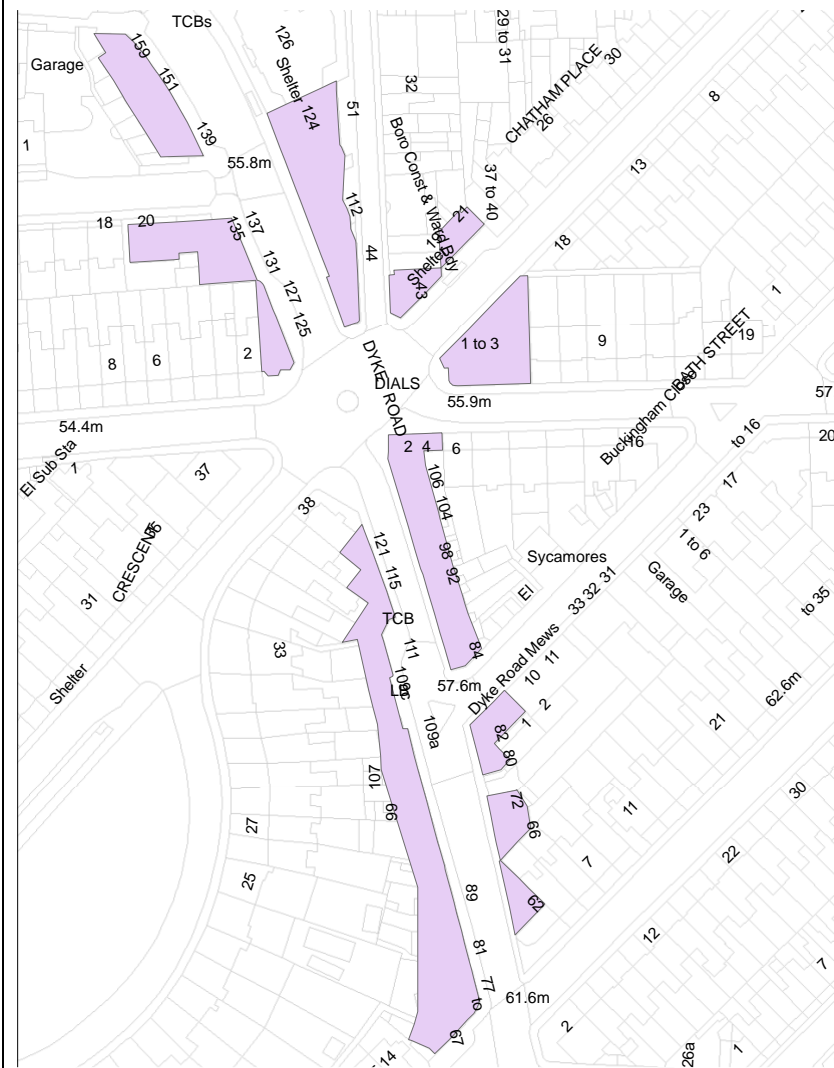
Summary: Additional units to the west of the centre have been included in the local centre as they offer good local services for the adjacent residential population. Overall the centre is faring well in terms of vacant units with just 4% in 2018/19. 62% of units in the proposed centre are within A1 retail use.

Seven Dials

Current Seven Dials Local Centre Frontages (as shown on Policies Map)



Proposed Seven Dials Local Centre Frontages (as shown on the draft CPP2 Policies Map)



Proposed Changes: Seven Dial Local Centre

Additions

- 62 Dyke Road
- 64A Dyke Road
(previously excluded units from frontage but in active use, good footfall)

Summary: A couple of additional units have been included in the centre which benefit from good footfall. The 2018/19 health check shows that the centre would be policy compliant with 52% of units in A1 use. This centre has a very low vacancy rate at just 2%.

Fiveways

Current Fiveways Local Centre Frontages (as shown on Policies Map)



Proposed Fiveways Local Centre Frontages (as shown on the draft CPP2 Policies Map)



Proposed Changes: Fiveways Local Centre

Additions

- 253A Ditchling Road
 - 253B Ditchling Road
 - 253C Ditchling Road
 - 253D Ditchling Road
 - 253E Ditchling Road
- (previously excluded units which make sense to include as contributes to the centre's vitality)*

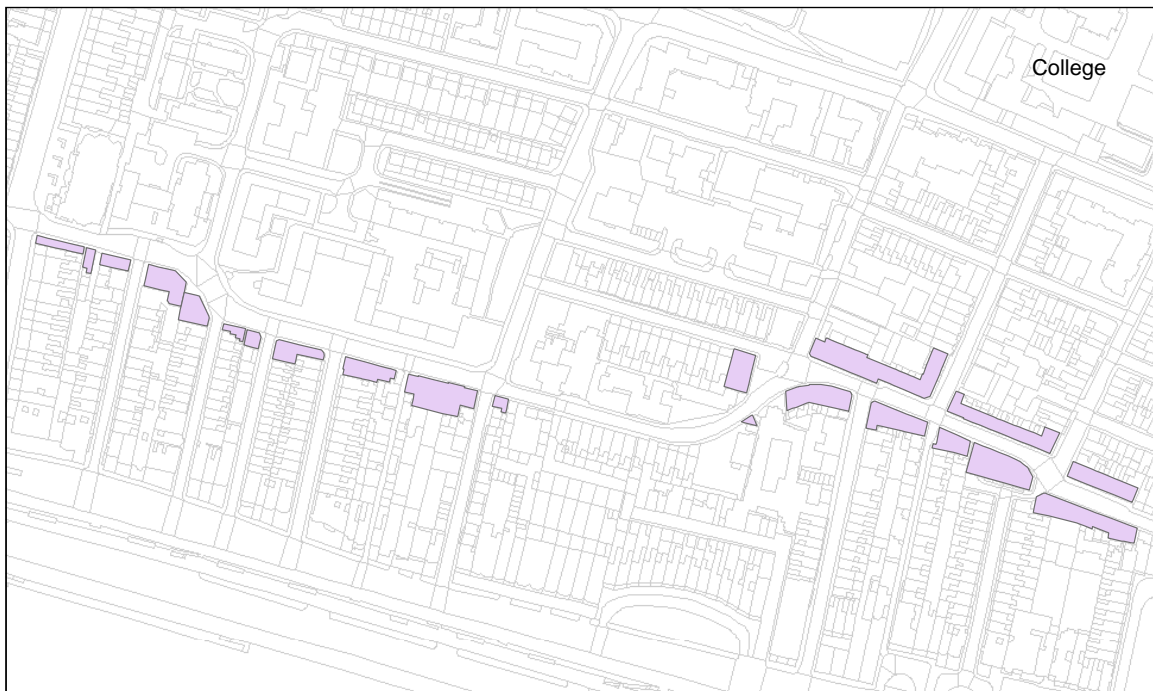
Summary: Additional units are proposed to be included in the centre along Ditchling Road. Overall this centre is very healthy in terms of A1 retail units reaching 65% and no vacancies.

St George's Road

Current St George's Road Local Centre Frontages



Proposed St George's Road Local Centre Frontages



Proposed Changes: St George's Road Local Centre

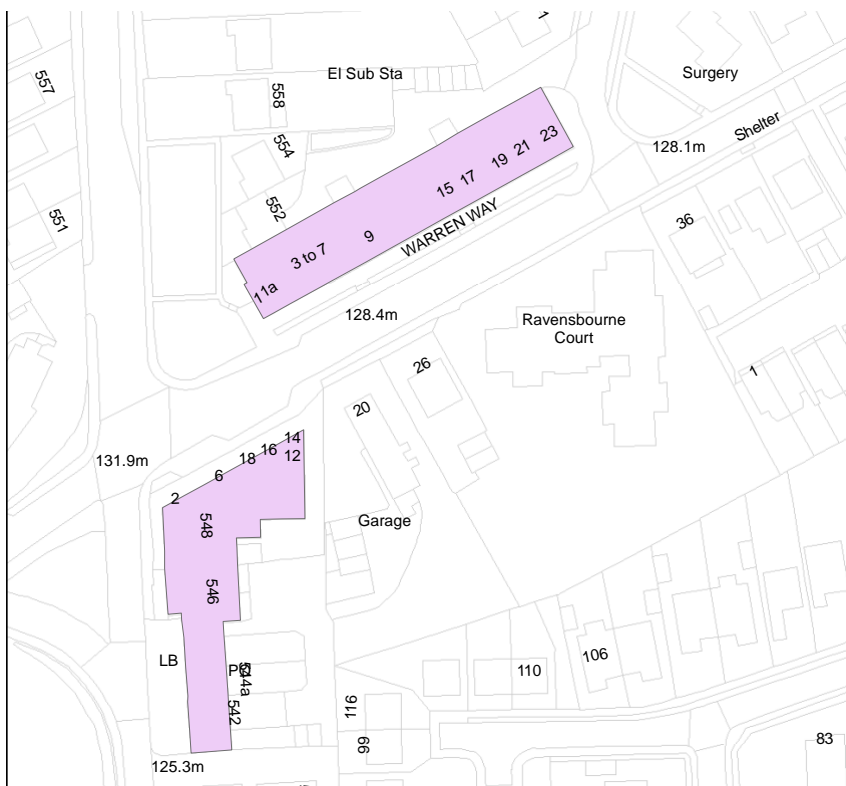
Additions

- 12 Bristol Road (A1)
(previously excluded unit)

Summary: It is proposed that one excluded unit is included within the local centre boundary which overall means that the centre has 58% A1 retail as at 2018/19 and no vacancies.

Warren Way

Current Warren Way Local Centre Frontages (as shown on Policies Map)



Proposed Warren Way Local Centre Frontages (as shown on the draft CPP2 Policies Map)



Proposed Changes: Warren Way Local Centre

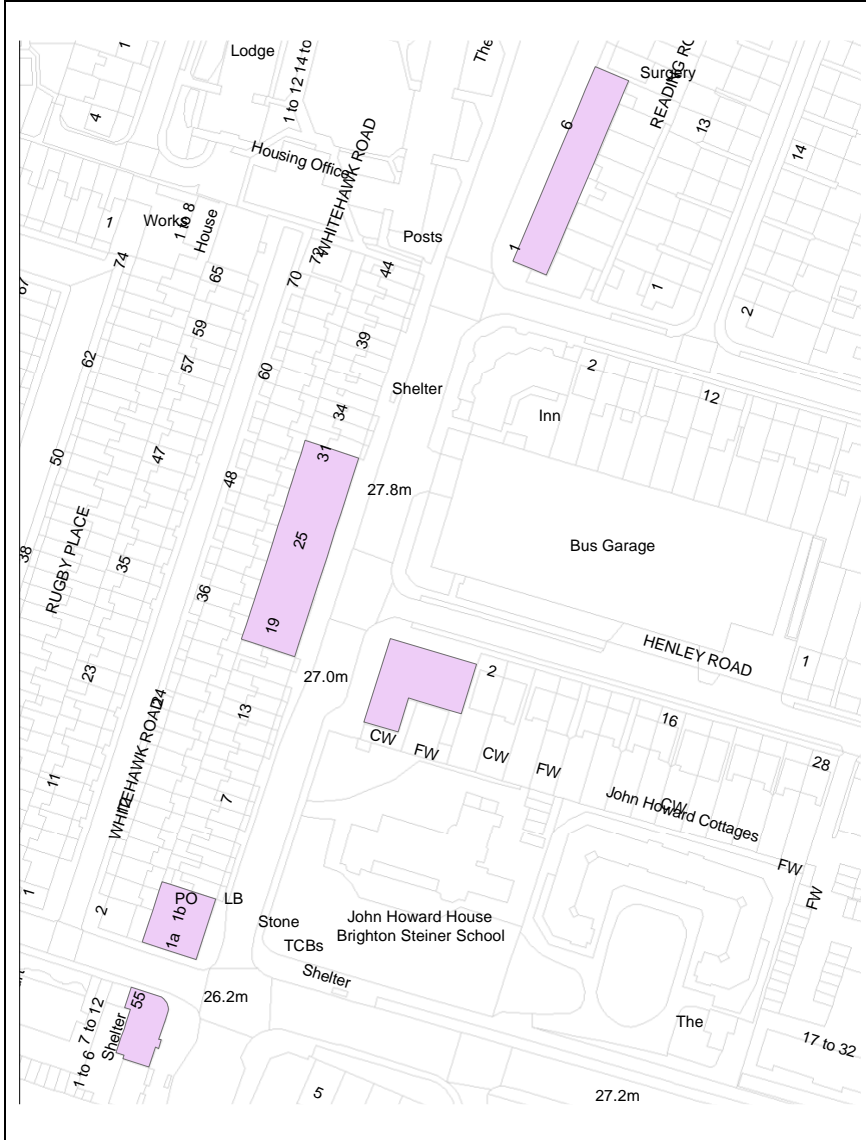
Deletions

- 542a Falmer Road (C3) as in residential use
- 546 Falmer Road (C3) as in residential use

Summary: Residential units on Falmer Road are proposed to be deleted from the local centre which results in 47% of units being in A1 retail use and no vacancies.

Whitehawk Road

Current Whitehawk Road Local Centre Frontages (as shown on Policies Map)



Proposed Whitehawk Road Local Centre Frontages (as shown on the draft CPP2 Policies Map)



Proposed Changes: Whitehawk Road Local Centre

Additions

- 45 Arundel Road (Lidl)
 - 53 Arundel Road (Fabric Warehouse)
 - 35-36 Whitehawk Road (Plaice 4 fish)
 - Daily Bread (37 Whitehawk Road)
- (previously excluded units which make sense to include within the centre as they add to the vitality and viability)*

Summary: Four additional units are proposed to be added to the centre to enrich the local centre with additional A1 units. This results in 57% of units being in A1 use which is policy requirement. There are currently no vacancies in this centre as at 2018/19.

High Street, Rottingdean

Current High Street, Rottingdean Frontages (as shown on the Policies Map)



Proposed High Street, Rottingdean Frontages (as shown on the draft CPP2 Policies Map) as at 2018



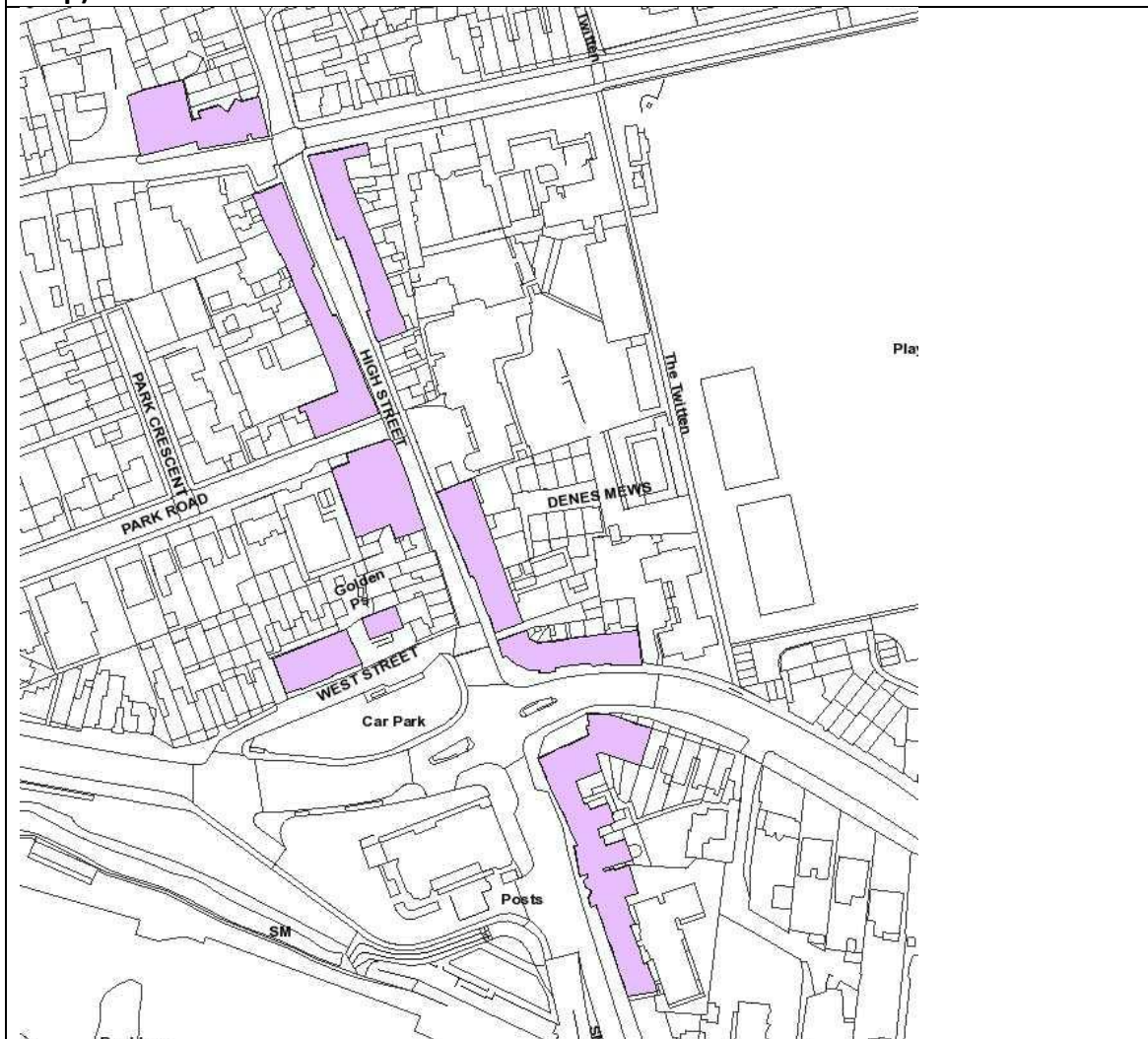
Proposed Changes Assessed and Agreed

Deletions	Additions
<ul style="list-style-type: none"> - 12 to 20 Marine Drive - 78 to 84 High Street <i>(predominately residential units)</i> 	<ul style="list-style-type: none"> - 2 to 8 West Street <i>(Tesco and another unit)</i> - 46 to 10 High Street <i>(additional units in the centre that were never included in the designation but contribute to vitality and viability of centre)</i>

Additional changes to Rottingdean High Street July 2019 at the request of Rottingdean Parish Council

A few additions to Rottingdean High Street have been included to align with the draft Rottingdean Neighbourhood Plan by Rottingdean Parish Council.

Proposed High Street, Rottingdean Frontages (as shown on the draft CPP2 Policies Map) as at 2019



Proposed Changes Assessed and Agreed

Deletions	Additions
- 12 to 20 Marine Drive - 78 to 84 High Street <i>(predominately residential units)</i>	- 2 to 8 West Street <i>(Tesco and another unit)</i> - 46 to 10 High Street <i>(additional units in the centre that were never included in the designation but contribute to vitality and viability of centre)</i> -28-29 Park Road - The Chapel - Laureen's Walk, 8-10 Nevill Road - 2-6 Nevill Road -73-75 High Street

Summary: The changes proposed to the High Street Rottingdean result in 54% of units being in A1 use with no vacancies as at 2018/19.

Centres with no changes proposed

No changes to the Local Plan Local Centre retail designation are proposed at the following centres;

- Mill Lane
- The Grenadier
- Richardson Road
- Eldred Avenue
- Old London Road
- Ladies Mile Road
- Hollingbury Place
- Beaconsfield Road
- Lustrells Vale
- Longridge Avenue

Table 1 provides an overview of the above assessments.

Health Checks 2018/2019 update

An update to the 2017 health checks was undertaken in late 2018 early 2019 to update the data held for each centre, to ensure that there were no fundamental differences between datasets. This updated data is reflected overleaf;

Table 1 Summary Assessment of Centres

- Coloured **green** if policy compliant
- Coloured **red** if not policy compliant

		Local Plan 2005			CPP2				
Shopping Centre	Frontage Type	% of A1 from 2015/16 health check	% of A1 from 2017 health check	Local Plan 2005 policy %	Proposed % for CPP2 as at 2020 version	15/16 A1 % compliant with CPP2 threshold as at 2020 version?	2017 % A1 compliant with CPP2 threshold as at 2020 version?	2017 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?	2018/19 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?
Regional Centre	Primary Frontage	76%	76%	75%	75%	Yes	Yes	76%	76%
	Secondary Frontage	54%	54%	Healthy Balance & Mix	35%	Yes	Yes	54%	54%
Town Centres	London Road	Whole Centre	51%	50%	N/A	N/A	N/A	N/A	N/A
		Primary Frontage	57%	50%	(Clear Predominance)	50%	Yes	Yes 50%	57%

Shopping Centre		Frontage Type	Local Plan 2005			CPP2				
			% of A1 from 2015/16 health check	% of A1 from 2017 health check	Local Plan 2005 policy %	Proposed % for CPP2 as at 2020 version	15/16 A1 % compliant with CPP2 threshold as at 2020 version?	2017 % A1 compliant with CPP2 threshold as at 2020 version?	2017 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?	2018/19 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?
		Secondary Frontage	44%	44%	Healthy Balance & Mix	30%	Yes	Yes 44%	44%	44%
	Hove	Whole Centre	53%		50%	N/A	N/A	N/A	N/A	N/A
		Primary Frontage	63%	63%	(Clear Predominance)	50%	Yes	Yes 63%	64%	68%
		Secondary Frontage	44%	41%	Healthy Balance & Mix	30%	Yes	Yes 41%	45%	45%
District Centres	St James' s Street	Whole Centre	55%	55%	50%	N/A	N/A	N/A	N/A	N/A
		Primary Frontage	63%	59%	(Clear Predominance)	50%	Yes	Yes 59%	59%	59%

Shopping Centre		Frontage Type	Local Plan 2005			CPP2				
			% of A1 from 2015/16 health check	% of A1 from 2017 health check	Local Plan 2005 policy %	Proposed % for CPP2 as at 2020 version	15/16 A1 % compliant with CPP2 threshold as at 2020 version?	2017 % A1 compliant with CPP2 threshold as at 2020 version?	2017 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?	2018/19 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?
Lewes Road	Secondary Frontage	53%	53%	Healthy Balance & Mix	30%	Yes	Yes 53%	56%	46%	
	Whole Centre	50%		50%	N/A	N/A	N/A	N/A	N/A	
	Primary Frontage	49%	67%	(Clear Predominance)	50%	No	No 46%	Yes	49%	
	Secondary Frontage	59%	47%	Healthy Balance & Mix	30%	Yes	Yes 53%	Yes	47%	

Shopping Centre		Frontage Type	Local Plan 2005			CPP2				
			% of A1 from 2015/16 health check	% of A1 from 2017 health check	Local Plan 2005 policy %	Proposed % for CPP2 as at 2020 version	15/16 A1 % compliant with CPP2 threshold as at 2020 version?	2017 % A1 compliant with CPP2 threshold as at 2020 version?	2017 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?	2018/19 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?
	Boundary Road/Station Road	Whole Centre	55%	54%	50%	N/A	N/A	N/A	N/A	N/A
		Primary Frontage	67%	65%	(Clear Predominance)	50%	Yes	Yes 65%	64%	64%
		Secondary Frontage	45%	44%	Healthy Balance & Mix	30%	Yes	Yes 44%	56%	53%
Local Centres	Mill Lane	Whole Centre	75%	63%	65%	50%	Yes	Yes 63%	No changes proposed	No changes proposed 63%

Shopping Centre		Frontage Type	Local Plan 2005			CPP2				
			% of A1 from 2015/16 health check	% of A1 from 2017 health check	Local Plan 2005 policy %	Proposed % for CPP2 as at 2020 version	15/16 A1 % compliant with CPP2 threshold as at 2020 version?	2017 % A1 compliant with CPP2 threshold as at 2020 version?	2017 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?	2018/19 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?
	Portland Road	Whole Centre	67%	63%	65%	50%	Yes	Yes 63%	63%	62%
	The Grenadier	Whole Centre	66%	58%	65%	50%	Yes	Yes 58%	No changes proposed	No changes proposed 55%
	Richardson Road	Whole Centre	87%	86%	65%	50%	Yes	Yes 86%	No changes proposed	No changes proposed 86%
	Eldred Avenue	Whole Centre	75%	75%	65%	50%	Yes	Yes 75%	No changes proposed	No changes proposed 86%

Shopping Centre		Frontage Type	Local Plan 2005			CPP2				
			% of A1 from 2015/16 health check	% of A1 from 2017 health check	Local Plan 2005 policy %	Proposed % for CPP2 as at 2020 version	15/16 A1 % compliant with CPP2 threshold as at 2020 version?	2017 % A1 compliant with CPP2 threshold as at 2020 version?	2017 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?	2018/19 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?
	Old London Road	Whole Centre	67%	67%	65%	50%	Yes	Yes 67%	No changes proposed	No changes proposed 67%
	Ladies Mile Road	Whole Centre	50%	44%	65%	50%	Yes	No 44%	No changes proposed	No changes proposed 44%
	Seven Dials	Whole Centre	55%	49%	65%	50%	Yes	No 49%	51%	52%
	Fiveways	Whole Centre	64%	64%	65%	50%	Yes	Yes 64%	66%	65%

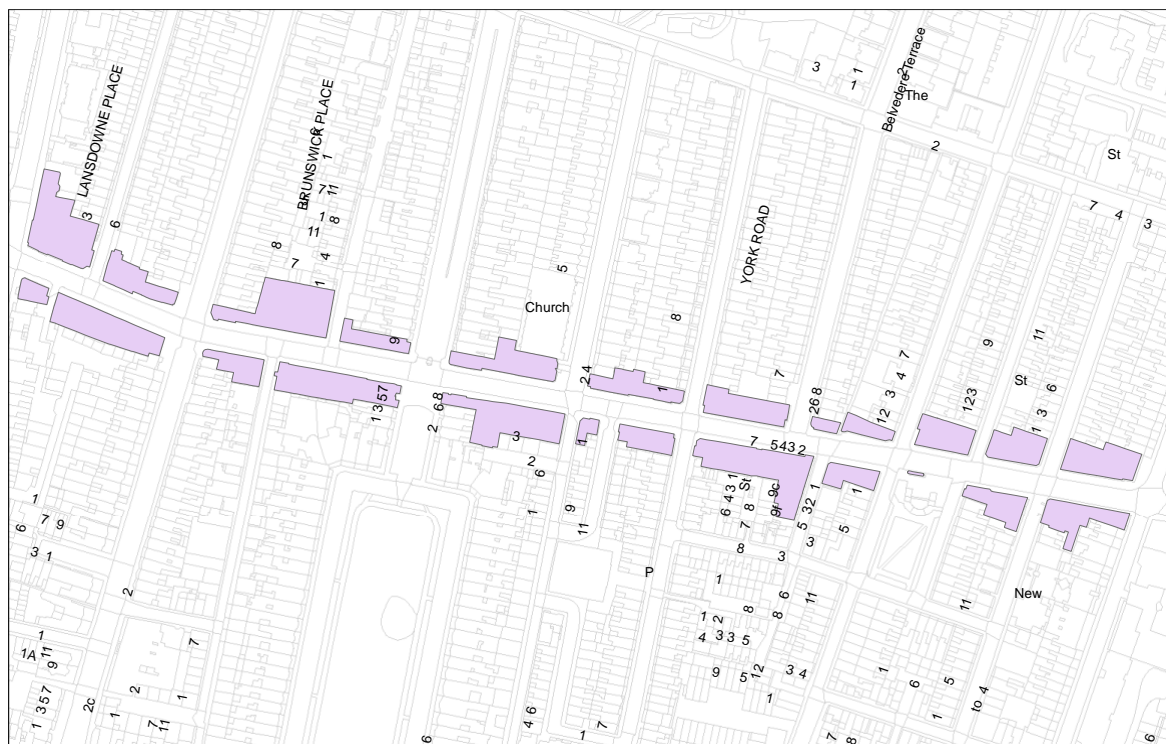
Shopping Centre		Frontage Type	Local Plan 2005			CPP2				
			% of A1 from 2015/16 health check	% of A1 from 2017 health check	Local Plan 2005 policy %	Proposed % for CPP2 as at 2020 version	15/16 A1 % compliant with CPP2 threshold as at 2020 version?	2017 % A1 compliant with CPP2 threshold as at 2020 version?	2017 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?	2018/19 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?
	Hollingbury Place	Whole Centre	50%	43%	65%	50%	Yes	No 43%	No changes proposed	No changes proposed 43%
	Beaconsfield Road	Whole Centre	55%	64%	65%	50%	Yes	Yes 64%	No changes proposed	No changes proposed 64%
	St George's Road	Whole Centre	56%	58%	65%	50%	Yes	Yes 58%	58%	58%
	Warren Way	Whole Centre	42%	42%	65%	50%	Yes	No 42%	47%	47%

Shopping Centre		Frontage Type	Local Plan 2005			CPP2				
			% of A1 from 2015/16 health check	% of A1 from 2017 health check	Local Plan 2005 policy %	Proposed % for CPP2 as at 2020 version	15/16 A1 % compliant with CPP2 threshold as at 2020 version?	2017 % A1 compliant with CPP2 threshold as at 2020 version?	2017 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?	2018/19 % A1 with proposed changes compliant with CPP2 threshold as at 2020 version?
	Whitehawk Road	Whole Centre	58%	50%	65%	50%	Yes	Yes 50%		57%
	High Street Rottingdean	Whole Centre	49%	47%	65%	50%	Yes	No 47%	57%	54%
	Lustrells Vale	Whole Centre	53%	53%	65%	50%	Yes	Yes 53%	No changes proposed	47%
	Longridge Avenue	Whole Centre	57%	57%	65%	50%	Yes	Yes 57%	No changes proposed	57%

Assessment of New Local Centres

Disclaimer: The assessments took place in 2017 before the changes to the Use Class Order in September 2021 and therefore refer to previous use classes.

Brunswick Town (area from Montpelier Road to Holland Road, Hove)



During the Stakeholders Workshops undertaken as part of the City Plan Part Two consultation it was suggested that a new Local Centre is created for Brunswick Town in order to add further protection to the current retail offer in this area for residents. Local centres facilitate access to food produce and key services particularly on foot in line with City Plan Part One Policy SA6 Sustainable Neighbourhoods.

Currently the area, as identified in the map above, is designated as outside the prime frontage of the regional centre (i.e. identified as secondary frontage) and as such the change of use from an A1 retail unit in this area is subject to Brighton & Hove Local Plan policy SR4 Regional Shopping Centre. This Local Plan policy permits the loss of retail use in areas outside the prime frontage of the regional centre subject to a healthy balance and mix of uses (including Class A1 retail) being retained and concentrations of uses other than Class A1 being avoided. In addition, this policy requires that a proposed non-retail use should still attract pedestrian activity to the centre and should not have a significantly harmful impact on the amenity of the area.

If the area identified in the above map was already designated as a Local Centre current Brighton & Hove Local Plan policy SR6 Local Centres would be applicable. Policy SR6 requires that any proposals for the change of use resulting in the loss of an A1 retail unit would have to comply with 5 criteria which include the requirement to retain a predominance of 65% of A1 retail uses within the centre.

It is considered that the Brunswick stretch of the current Regional Centre secondary frontage would meet the characteristics of a 'local centre'. This area typically serves the immediate residential catchment area surrounding it and includes typical uses that you would find in a local centre such as, amongst other shops, two small supermarkets, newsagents, a pharmacy, hot food takeaways and a launderette.

It is anticipated that CPP2 will require areas identified as secondary frontage of the regional centre to retain at least 35% A1 retail use whilst areas identified as Local Centres will require at least 50% of the Local Centre frontage to be retained as A1 retail. Whilst the most recent health check figures (2018/19) for the new Brunswick Town Centre would suggest that in its current state that local centre would not be policy compliant with the thresholds set out in City Plan Part Two (42% retail), it is recognised that its designation as a local centre would offer greater protection to this stretch of shops and services for the adjoining area than in its current policy designation and should help harness a retail offer for the future.

As a result of the above, the adoption of the area that currently forms part of the secondary frontage of the Regional shopping area as a new Local shopping centre would result in the greater protection and the enhancement of the vitality and viability of this shopping area of the City.

Other potential Local Centres assessed but not taken forward

Warren Road, Warren Road combined with Warren Way, Goldstone Villas

Following an assessment of the current retail situation at the above it was concluded that Warren Road and Goldstone Villas should be designated as Important Retail Parades. It was also concluded that Warren Way should remain as a Local Centre without being combined with Warren Road given the divide between these two areas.

Preston Street

During the Stakeholders Workshops undertaken as part of the City Plan Part Two consultation it was suggested that Preston Street is included as a local centre or part of the frontage of the regional centre.

Preston Street does not currently form part of a designated shopping area and as such any change of use from A1 retail within the street would be subject to current Brighton & Hove Local Plan policy SR7 Local Parades or SR8 Individual Shops.

At present Preston Street comprises predominantly of A3 and A5 units with the provision of a limited number of A1 retail units.

The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) allows the change of use of an A1 retail unit to other uses subject to certain restrictions or subject to prior approval applications.

The overall amount of retail provision provided in Preston Street is already very low and therefore it is considered that it would not be worthwhile to include this street as a Local Centre or as part of the designated Regional Centre which would provide some retail provision protection.

Assessment of Possible New Local Shopping Centres			
Shopping Area	Proposed % for CPP2	% from 2017 Health Check re LP 2005 designation	2017 % CPP2 Proposed Policy Compliant
Goldstone Villas, Hove	50%	59%	Yes
Brunswick Town Hove (current sec. frontage of Regional Centre)	50%	44%	No
Warren Road	50%	50%	Yes
Warren Way & Warren Road combined	50%	46.6%	No

Designation of Important Retail Parades

Disclaimer: The following assessments of Important Local Parades (ILPs) took place in 2017 before the changes to the Use Class Order in September 2021 and therefore refer to previous use classes.

The term Important Local Parades (ILPs) refers to a group of shops (five or more). ILPs have a key role in contributing to sustainable development, providing access to day-to-day necessities such as a newsagent, convenience store off-licence, pharmacies and post offices, within walking distance from home.

An assessment was undertaken during May and June of 2017 to identify parades which could have the potential to be designated as Important Retail Parades in City Plan Part 2. An assessment of the parades regarding the following was undertaken;

- Are there 6 or more units?
- Do these units serve the immediate locality?
- Are at least 51% of the floorspace/units occupied?
- Are at least 51% of the units in A1 use?

Table 2 sets out the assessment undertaken for 35 parades identified across the City. Out of the 35 parades assessed it was concluded that 10 could be designated as Important Retail parades in City Plan Part 2.

For the reasons set out in Table 2 the following parades were identified as meeting the criteria to be designated as Important Retail Parades in City Plan Part 2. The health check data to support these parades was later updated in 2018/2019 to ensure that all proposed designations still remained relevant and appropriate;



Hove Park Villas, Hove



Woodland Parade Hove



Valley Road, Portslade



Old Shoreham Road/Sackville Road, Hove



Victoria Terrace, Hove



Islingword Road, Brighton



Warren Road, Woodingdean



Cowley Drive, Woodingdean



Preston Drive, Preston Park



Table 2 - Assessment of Proposed Important Retail Parades

Parades in B&H	Are there 6 or more units?	Do these units serve the immediate locality?	Are at least 51% of the floorspace/units occupied?	Are at least 51% of the units in A1 use?	Include as an ILP?	Reasons to not Include/include
1. Burwash Road Hove	No 5	Yes	Yes	Yes	No	Although contains a convenience store the pharmacy is likely to be the most used unit here during the day. Other units do not offer much retail/service offer. Neighbourhood area can access other shops in surrounding area including Waitrose.
2. 346-376 Carden Ave Patcham	Yes 8	Yes	Yes	No	No	Post office and 2 convenience stores, which are most used units, and which so provide for day to day necessities however parade is located close to Sainsbury's local store and large Asda store which are likely to impact upon parade.
3. Church Road Portslade	Yes 8	Yes	Yes	Yes – but some currently vacant	No	Retail offer poor. No real essential retail services apart from small newsagent. Although newsagent may provide some day to day necessities is located close to Boundary Road/Station Road District shopping centre
4. Cowley Drive Woodingdean	No 5	Yes	Yes	Yes	Yes	Whilst conversion of two shops into large pharmacy has resulted in only 5 units in the parade, the

Parades in B&H	Are there 6 or more units?	Do these units serve the immediate locality?	Are at least 51% of the floorspace/units occupied?	Are at least 51% of the units in A1 use?	Include as an ILP?	Reasons to not Include/include
						two convenience stores (one comprising a post office) and pharmacy provide day to day necessities in an area not located near other retail facilities Key area for residential properties to access.
5. Edward Street Brighton	Yes 18	Yes	Yes	No	No	Parade fragmented by other roads. Only contains one I convenience store. Types of units tend to be coffee shops/cafes and solicitors. Other A1 units do not provide for day to day needs for local residents. Parade close to St James Street District Centre.
6. Elm Drive Hove	No 5	Yes	Yes	Yes – although one currently vacant	No	Close to the Grenadier Local Centre. Retail and Service offer poor. Too small to be classified as an ILP Convenience store provides for limited day to day needs.
7. Goldstone Villas Hove	Yes 17	Yes	Yes	Yes 2018 2019 this has dropped to 50% A1	Yes - but could designate as a local centre as large and will be essential when DA6 area built as	Good mix of services and retail offer. Close to Hove Station, good footfall. Should be an Important Local Parade if not part of local centre even though close to Hove Town Centre due

Parades in B&H	Are there 6 or more units?	Do these units serve the immediate locality?	Are at least 51% of the floorspace/units occupied?	Are at least 51% of the units in A1 use?	Include as an ILP?	Reasons to not Include/include
					population of local area will change	to development potential in DA6 area = increase in population needing local shops and services.
8. Graham Ave Portslade	Yes 9	Yes	Yes	No	No	Convenience store with post office represents a local hub for surrounding residential area selling fresh food and would provide for some day to day needs. Not near any other local centres however a new CO-OP store is under construction nearby which may affect use of convenience store in parade.
9. Hangleton Way Hove	No 5	Yes	Yes	No	No	Although convenience store/pizzeria would provide some day to day necessities, overall retail offer is poor. Other uses A5 and vets. Located near to large Sainsbury's store
10. Hove Manor Parade Hove	Yes 9	Yes	Yes	Yes	No	Near to Hove Town Centre. Contains shops, services, a restaurant and beauty salon. Although convenience store would provide for some day to day needs overall retail provision considered poor.

Parades in B&H	Are there 6 or more units?	Do these units serve the immediate locality?	Are at least 51% of the floorspace/units occupied?	Are at least 51% of the units in A1 use?	Include as an ILP?	Reasons to not Include/include
11. Hove Park Villas Hove	Yes 7	Yes	Yes	Yes	Yes	Good mix of shops and services north of Hove Station including patisserie, pharmacy and convenience store, providing for local resident day to day needs
12. Islingword Road Brighton	Yes 7	Yes	Yes	No	Yes	Contains a post office within a convenience shop. Although limited retail provision parade is not located nearby other shopping areas for local residents to access easily. Parade also provides a pharmacy, doctors and pub.
13. Kingsway Hove	Yes 8	Yes	Yes	No	No	One convenience store, various offices, and specialist retailers. Although convenience store may provide for some local residents day to day needs, overall retail offer considered poor.
14. Loyal Parade,	Yes 6	Yes	Yes	Yes – although one unit is mixed A1 and D1	No - shops tend to serve a specialist consumer on the whole	Although convenience store may provide for some local residents day to day needs, overall retail offer considered poor. Parade located close to Eldred Avenue Local Centre
15. Mackie Avenue Patcham	No 4	Yes	Yes	No	No	Although convenience store may provide for some local residents

Parades in B&H	Are there 6 or more units?	Do these units serve the immediate locality?	Are at least 51% of the floorspace/units occupied?	Are at least 51% of the units in A1 use?	Include as an ILP?	Reasons to not Include/include
						day to day needs, overall retail offer considered poor.
16. Matlock Road Brighton	No 6	Yes	Yes	No	No	Although convenience stores may provide for some local residents day to day needs, overall retail offer considered poor and shops on differing sides of the road, too fragmented and small to form a parade.
17. Montefiore Road/Davigdor Hove	Yes 14	Yes	Yes	Yes	No	Although convenience stores may provide for some local residents day to day needs, overall retail offer considered poor and parade fragmented.
18. Old Shoreham Road / Sackville Road Hove	Yes 21	Yes	Yes	Yes	Yes	Good mix of retail and services which would provide for local residents day to day needs. Should allocate as an important parade in view of the development proposals at Sackville Trading Estate.
19. Western End of Portland Road Hove	Yes 8	Yes	Yes	Yes	No	Although convenience stores may provide for some local residents day to day needs, overall retail offer considered poor This parade is close enough

Parades in B&H	Are there 6 or more units?	Do these units serve the immediate locality?	Are at least 51% of the floorspace/units occupied?	Are at least 51% of the units in A1 use?	Include as an ILP?	Reasons to not Include/include
						to Boundary Road and the proposed extended Portland Road Local Centre
20. Preston Road Brighton	Yes 15	Yes	Yes	No	No	Good mix of services and convenience stores although Sainsbury's included now, percentage of retail uses low and overall retail provision poor.
21. Queen Victoria Avenue Parade Hove	Yes 9	Yes	Yes	Yes	No	Although convenience stores may provide for some local residents day to day needs, overall retail offer considered poor. Close to Waitrose
22. Rock Street Brighton	Yes 10	Yes	Yes	No	No	Although the convenience store may provide for some local residents day to day needs, overall retail offer considered poor. Some units retain shopfront but are within a C3 use. Too fragmented to form a parade.
23. Meadow Close, Rottingdean	No 4	Yes	No	No	No	Too small, no retail provision to meet day to day local residents needs
24. Sackville Road Hove	Yes 9	Yes	Yes	Yes – but 2 currently vacant	No	Although convenience stores may provide for some local residents day to day needs,

Parades in B&H	Are there 6 or more units?	Do these units serve the immediate locality?	Are at least 51% of the floorspace/units occupied?	Are at least 51% of the units in A1 use?	Include as an ILP?	Reasons to not Include/include
						overall retail offer considered poor. Close to Hove town centre.
25. 51-83 St Georges Road Parade Brighton - plus some units opposite	Yes 24	Yes	Yes	No	No	Although convenience stores may provide for some local residents day to day needs, overall retail offer considered poor. Very close to St Georges Road Local Centre and St James's Street
26. 'Town's Corner' corner of Northease drive and Hangleton Way Hove	No 6	Yes	Yes	Yes	No	Although convenience store may provide for some local residents day to day needs, overall retail offer considered poor. Located close to Sainsbury's.
27. Valley Road Portslade	Yes 10	Yes	Yes	Yes	Yes	Several units selling convenience food, although services also available. Good resource for immediate residential area. Two new stores opened up in 2019.
28. Victoria Terrace Hove	Yes 23	Yes	Yes		Yes	Busy parade, with variety of shops and services. Convenience stores provide for some local residents day to day needs. Development of former petrol station located nearby would increase residential and A1 retail provision.

Parades in B&H	Are there 6 or more units?	Do these units serve the immediate locality?	Are at least 51% of the floorspace/units occupied?	Are at least 51% of the units in A1 use?	Include as an ILP?	Reasons to not Include/include
29. Warren Road Woodingdean	Yes 26	Yes	Yes	Yes	Yes – although could consider extending existing Warren Way Local Centre designation to include these	Lots of units, variety of uses. Retail and services provide for local residents day to day needs,
30. Wilmington Parade Patcham	No 5	Yes	Yes	Yes	No	Parade too small and although convenience stores may provide for some local residents day to day needs, overall retail offer considered poor.
31. Woodland Parade Hove	Yes 6	Yes	Yes	Yes	Yes	A post office and two convenience stores, hairdressers etc. Convenience stores provide for some local residents day to day needs. Not near to any other shops
32. Carden Avenue, bottom of Carden Crescent	No 5	Yes	Yes	No	No	Although Sainsbury stores may provide for some local residents day to day needs, overall retail offer considered poor and parade too small.
33. Carden Avenue, junction with Patchdean	Yes 7	Yes	Yes	No	No	Although convenience store may provide for some local residents day to day needs, overall retail offer considered poor

Parades in B&H	Are there 6 or more units?	Do these units serve the immediate locality?	Are at least 51% of the floorspace/units occupied?	Are at least 51% of the units in A1 use?	Include as an ILP?	Reasons to not Include/include
34. Saltdean Vale, Saltdean	Yes 8	Yes	Yes	No	No	Although convenience store may provide for some local residents day to day needs, overall retail offer considered poor and 1 or 2 of the units has been converted to residential
35. Preston Drove, Preston Park	Yes 16	Yes	Yes	Yes	Yes	In close proximity to a residential area with a good selection of convenience shops and services with very low vacancies.

Definition

ILP - Important Local Parade - a shopping parade providing for day to day necessities.

Typically located in the heart of a residential community providing walk-in convenience shopping and limited local services

Appendix 3 - Existing Local Plan Shopping Frontage Policies

SR4 Regional shopping centre

Within defined prime frontages of the regional centre, the change of use of existing Class A1 use shops to Class A2, A3, A4 or A5 uses, will be permitted provided that all of the following criteria are met:

- a. as a result of the proposal there would not be a significant break in the shopping frontage of more than 10m;*
- b. it would not result in either the number of non-retail units or the proportion of frontages exceeding 25% of the shopping street(s) to which it relates;*
- c. it would have a positive effect on the shopping environment of the area by encouraging combined trips and attracting pedestrian activity to the centre; and*
- d. the development would not be significantly detrimental to the amenities of occupiers of nearby properties or the general character of the area.*

Exceptions to (a) may be permitted if it would allow an existing business currently occupying an immediately adjacent unit to expand.

Outside the prime frontage of the regional centre, the loss of retail use will be permitted provided that a healthy balance and mix of uses (including Class A1 retail) is retained and concentrations of uses other than Class A1 are avoided. The proposed use should still attract pedestrian activity to the centre and should not have a significantly harmful impact on the amenity of the area.

SR5 Town and district shopping centres

With the aim of maintaining and enhancing the defined prime frontages of:

- the Town Centres of London Road and Hove; and*
- District Centres of St James Street, Lewes Road, Brighton Marina and Boundary Road / Station Road;*

the change of use of existing Class A1 use shops to Class A2, A3 (cafes and restaurants), will be permitted provided all of the following criteria are met:

- a. a clear predominance of Class A1 uses would be maintained;*
- b. as a result of the proposal there would not be a significant break in the shopping frontage of more than 15 metres;*
- c. it would have a positive effect on the shopping environment of the area by encouraging combined trips and attracting pedestrian activity to the centre; and*
- d. the development would not be materially detrimental to the amenities of occupiers of nearby properties or the general character of the area.*

In addition to Class A2 and A3 uses, some Class D1 community uses (e.g. doctors, dentists) may be permitted provided that a window display is maintained and it can be demonstrated that the proposed use would draw pedestrian activity into the Centre.

Within any part of these Centres a change of use at ground floor level to residential in a shopping frontage will not be permitted.

Outside the prime frontage in the town and district centres, the loss of retail use will be permitted provided that a healthy balance and mix of uses (including Class A1 retail) is retained and concentrations of uses other than Class A1 are avoided. The proposed use should still attract pedestrian activity to the centre and should not have a significantly harmful impact on the amenity of the area.

SR6 Local centres

With the aim of maintaining and enhancing the following local centres:

Mill Lane, Portslade; Portland Road, Hove; 'The Grenadier', Hangleton Road; Richardson Road, Hove; Eldred Avenue, Withdean; Old London Road, Patcham; Ladies Mile Road, Patcham; Seven Dials; Fiveways; Hollingbury Place, Hollingdean; Beaconsfield Road, Preston Park; St George's Road, Kemp Town; Warren Way, Woodingdean; Whitehawk Road, Whitehawk; High Street, Rottingdean; Lustrells Vale, Saltdean; and Longridge Avenue, Saltdean;

the change of use of existing Class A1 use shops to Class A2, A3, A4 or A5 uses will be permitted, provided that all of the criteria, a) to e), are met:

- a. it would not result in either the number of non-retail units or the proportion of frontages exceeding 35% of the centre;*
- b. it has been adequately demonstrated that a Class A1 retail use is no longer economically viable in that particular unit or the centre as a whole;*
- c. the proposed use would attract pedestrian activity (particularly in the daytime) which would make a positive contribution to the vitality and viability of the centre;*
- d. the development would not be significantly detrimental to the amenities of occupiers of nearby residential properties or the general character of the area; and*
- e. the location and prominence of the proposed use would not lead to a significant break of more than 10 metres in the frontage.*

In addition to Class A2, A3, A4 or A5 uses, some Class D1 community uses (e.g. doctors, dentists) may be permitted provided that a window display is maintained and it can be demonstrated that the proposed use would draw pedestrian activity into the centre.

Changes of use at ground floor to residential will not be permitted in Local Centres.

SR7 Local parades

Within local parades the change of use of existing Class A1 use shops to Class A2, A3, A4 or A5 uses will be permitted provided that all of the following criteria are met:

- a. the number of units or frontages other than Class A1 in the parade would not exceed 50%;*
- b. it has been adequately demonstrated that an A1 retail use is no longer economically viable in that particular unit or parade;*
- c. the nature of the proposed use and the level of activity (particularly in the daytime) likely to be associated with it, would make a positive contribution to the vitality and viability of the parade; and*
- d. the development would not be significantly detrimental to the amenities of occupiers of nearby residential properties or the general character of the area.*

Exceptions to (a) may be permitted if the parade in question is within easy walking distance of a local, district, town centre or the regional shopping centre and all other criteria are met.

In addition to Class A2, A3, A4 or A5 uses, some Class D1 community uses (e.g. doctors, dentists) may be permitted provided that a window display is maintained and it can be demonstrated that the proposed use would draw pedestrian activity into the centre.

Changes of use at ground floor to residential will not be permitted in local parades.

SR8 Individual shops

Planning permission for changes of use of individual shops from Class A1 use will be permitted provided all of the following criteria are met:

- a. the shop is within easy walking distance of a local, district, town centre or the regional shopping centre and local residents within its catchment would still be within easy walking distance of a comparable shop;*
- b. it has been adequately demonstrated that an A1 retail use is no longer economically viable in that particular unit; and*
- c. the development would not be significantly detrimental to the amenities of occupiers of nearby residential properties or the general character of the area.*

