Compiled by the Planning Policy, Projects & Heritage Team at Brighton & Hove City Council

Shopping Frontage Review

May 2018



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Introduction

The purpose of this Topic Paper is to set out the background to the proposed changes to the council's retail frontages in the draft City Plan Part Two, as set out in Policies DM12, and DM13. These policies build on the Council's approach under adopted policy CP4 Retail Provision of City Plan Part One (CPP1) when determining planning applications.

The primary and secondary frontages of the City's shopping centres were last reviewed prior to the adoption of the Brighton and Hove Local Plan in 2005. Since 2005 there have been a number of policy and legislative changes as well as different retail trends and new developments which have affected the vitality and viability of our shopping frontage designations. A review of all the primary, secondary and local frontages currently designated in the Brighton and Hove City Plan Part One has been undertaken in all the centres as set out in the retail hierarchy below.

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	

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) March 2012 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 recognise town centres as the heart of our communities and to include policies to support their vitality and viability. The NPPF provides policies on how Local Plans should consider town centres uses and how planning applications for town centres uses should be considered.

One of the requirements of the NPPF which must be met by local authorities is to define a network and hierarchy of shopping centres. Paragraph 23 of the NPPF requires local authorities to "set out policies for the management and growth of centres over the plan period" and "define a network and hierarchy of centres that is resilient to anticipated future economic change".

Annex 2 of the NPPF defines primary and secondary frontages as follows;

- Primary Shopping Frontages are likely to include a high proportion of retail uses, which may include food, drinks, clothing and household goods.
- Secondary Shopping Frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

The NPPF 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 70). Historically, shops and other Class A uses¹ 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.

Legislative 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. Specifically the Town and Country Planning (Use Classes) (Amendment) (England) Order 2015 and the Town and Country Planning (General Permitted Development (England) Order 2015 introduced the following key changes:

- Betting offices and pay day loan shops are removed from A2 use and become sui generis
- A new permitted development right allowing change of use from shops (A1) to financial and professional services (A2)

^{• 1} A1 uses - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes.

- A new permitted development right allowing change of use from shops (A1), financial and professional services (A2), betting offices, pay day loan shops and casinos to restaurants and cafes (A3) (up to 150sqm)
- A new permitted development right allowing change of use from shops (A1) and financial and professional services (A2) to assembly and leisure uses (D2) (up to 200sqm).

The new permitted development rights prevail over local planning policies when assessing planning applications.

It is important to ensure that a predominance of retail uses remains, particularly in primary frontages, as evidence shows that an over-proliferation of non-retail uses can seriously fragment shopping frontages, damage pedestrian circulation, undermine the scale of retail activity and ultimately change the character of the shopping centre and therefore undermine the vitality and viability of the town centre.

Local Context - Existing Retail Frontage Policies

The adopted City Plan Part One contains policy CP4 Retail Provision which 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 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) expect 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 1.

Some of the criteria based policies listed are considered no longer relevant, as they refer to changes that may occur under permitted development, and fail to allow changes which are now permissible. Some of the wording of the policies is also considered to be ambiguous in interpretation by applicants, planning officers and planning inspectors. The review of these policies is therefore considered appropriate taking into account national policies changes, changed local circumstances and the need for a streamlined set of clear, positively worded policies which was supported at CPP2 Scoping Consultation.

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.

Health Checks 2017 Methodology

City Plan Part Two Retail Policies Approach

The approach taken in City Plan Part Two responds to the requirements of national policy, the result of recent retail health check monitoring and also considers responses put forward during the CPP2 Scoping stage of public consultation where 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 retail 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 heath 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 Town and Country Planning (Use Classes) Order 1987 (as amended) as shown in the following table:

Use Class (as of	Indicative Types of Use
1 st October 2017)	maleutive Types of Osc
Class A1	Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices, pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes
Class A2	Financial services such as banks and building societies, professional services (other than health and medical services) and including estate and employment agencies.
Class A3	restaurants, snack bars and cafes - for the sale of food and drink for consumption on the premises -
Class A4	Public houses, wine bars or other drinking establishments (but not night clubs).
Class A5	For the sale of hot food, for consumption off the premises.
Class B1	Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.
Class B2	Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).
Class C3	Dwelling houses.
Class D1	Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court. Non-residential education and training centres.
Class D2	Cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreations (except for motor sports, or where firearms are used).
Class SG	Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: betting offices/shops, pay day loan shops, theatres, houses in multiple occupation, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, launderettes, taxi businesses, amusement centres and casinos

The data collected from the surveys was used to update the use class and physical location of shop units on a 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;

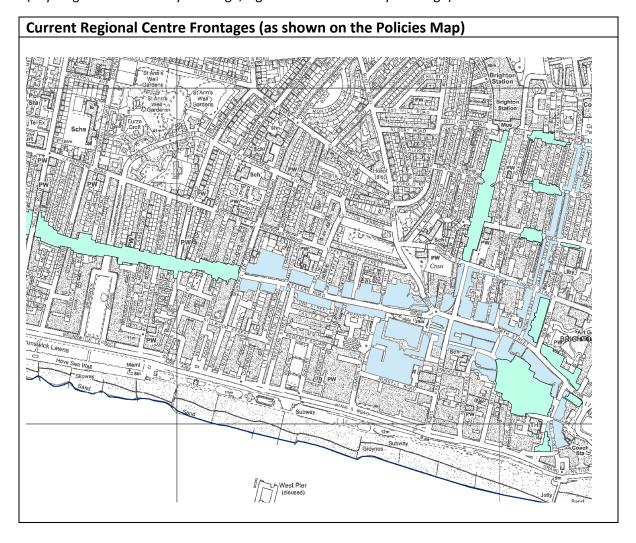
Shopping Centre	Defined Centres	Recommended A1 Use Class Retention for Primary Shopping Frontages (PSFs) and Secondary Shopping Frontages (SSFs)
Brighton		It is recommended that PSF
Regional Centre		should aim to maintain 75% of
		A1 uses and SSF should aim to maintain 35% of A1 uses
Town Centres	Hove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

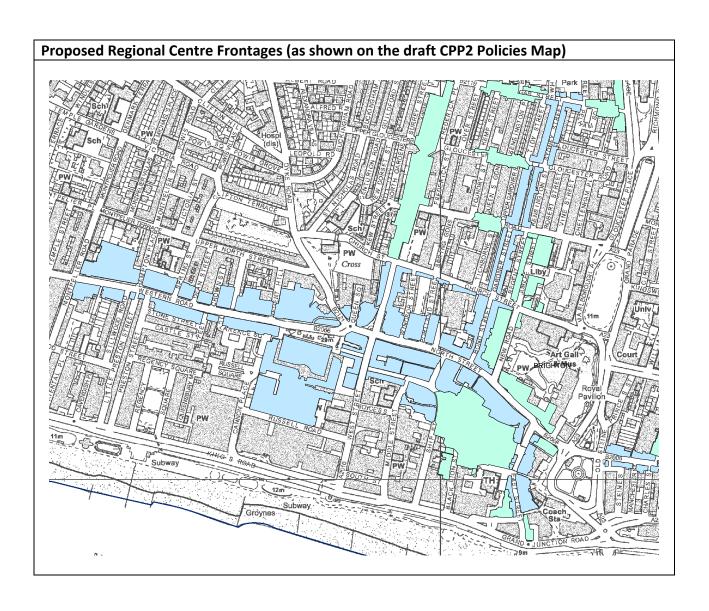
Shopping Centre	Defined Centres	Recommended A1 Use Class Retention for Primary Shopping Frontages (PSFs) and Secondary Shopping Frontages (SSFs)
Important Retail Parades	Seven Dials Fiveways Hollingbury Place, Hollingdean Beaconsfield Road, Preston Park St George's Road, Kemptown Warren Way, Woodingdean Whitehawk Road, Whitehawk High Street, Rottingdean Lustrell's Vale, Saltdean Longridge Avenue, Saltdean Longridge Avenue, Saltdean Brunswick Town, Hoe 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)





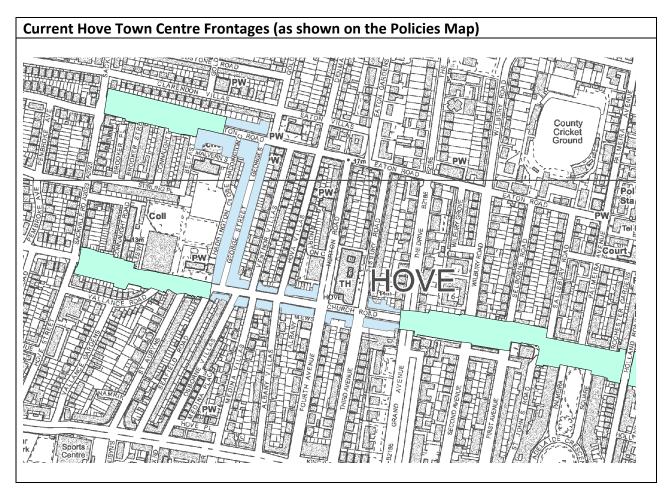
Regional Centre: Proposed Changes:

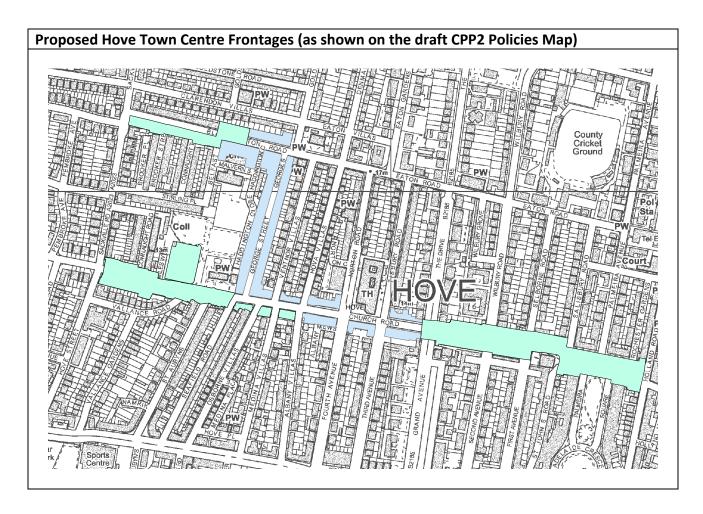
Deletions	Additions	Frontage change
Primary Frontage	Primary Frontage	Secondary to Local Centre
- Rear of 2 Western	- 87 to 88 Trafalgar Street	- Brunswick Town
Terrace (dwelling)	(A3)	
- 2 Pelham Street	- 32 West Street (office)	Centre Change
(dwelling)	- 33 West Street (A2)	- 16 -17 St Georges Place
	- 24 Gloucester Road (A1)	Change from Regional
Secondary Frontage		Secondary Frontage to
- Foyer Pelham Street		London Road Secondary
- 35, 35a, 36, and 37	Secondary Frontage	Frontage (A5)
North Road (dwellings)	- 1 to 17 Jubilee Street (new	
- 9a, 9b, 9c, 9d, 9e and 9F	units)	
Little Western Street	- 77 to 82 Trafalgar Street	
(dwellings)	(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)	

Town Centres Assessment

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

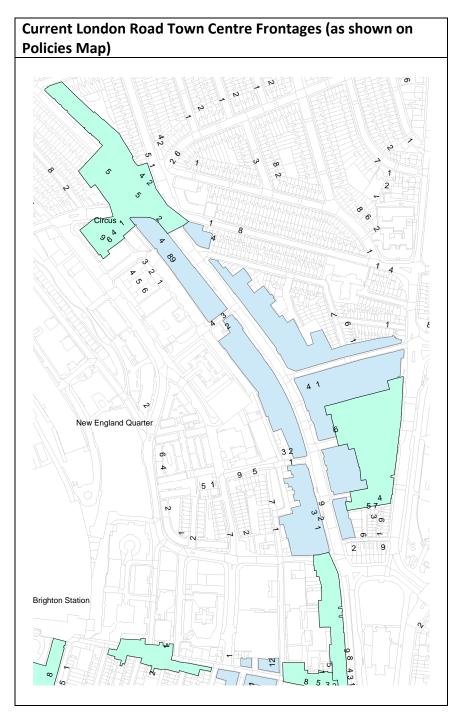
Hove

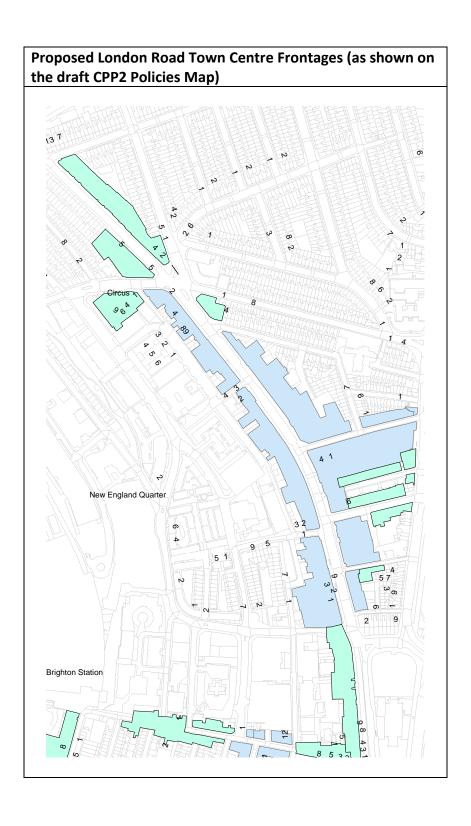




Proposed Changes: Hove Town Centre		
Deletions	Frontage change	
Secondary Frontage	Primary to Secondary	
 - 65 & 65A Sackville Road (estate agent and hairdressers but completely separate from rest of retail offer) -1 to 63 Blatchington Road (predominately dwellings) 	- 146 to 116a Church Road (this side of the road has increased its offer)	

London Road





Proposed Changes: London Road Town Centre		
Deletions	Additions	Frontage change
Primary Frontage	Primary Frontage	Centre Change
- Any residential	- 83 Ditchling Road	- 16 -17 St Georges Place Change to
properties fronting	(A1)	London Road Secondary Frontage from
Providence Place and		Regional Secondary Frontage
Elder Place which are	Secondary Frontage	
at the rear of units	- 10, 11, 12, 13, 14, &	Primary to Secondary
within London Road	15 St Georges Place	- 75 to 77B London Road
Town Centre	(shops)	
designation		
- 12 Baker Street		
(entrance to student		
accommodation)		
Secondary Frontage		
- 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		

District Centres

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

Boundary Road/Station Road District Centre

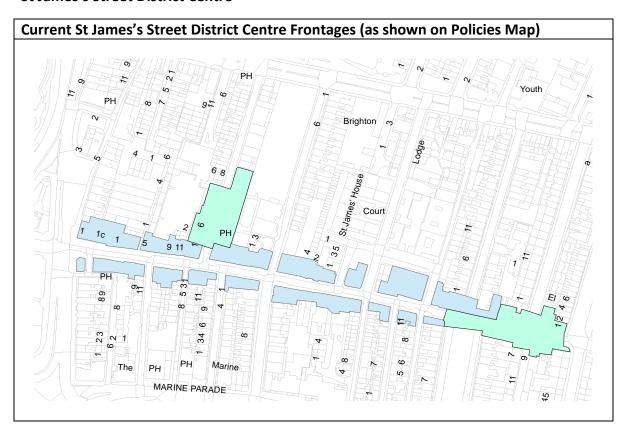


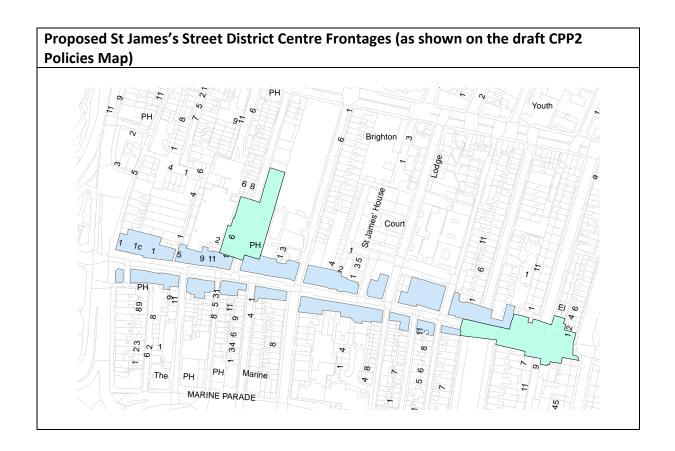


Proposed Changes Boundary Road /Station Road District Centre		
Deletions	Additions	Frontage change
Primary Frontage	Secondary Frontage	Primary to Secondary
- Unit 3 Vale Road	- 14-15 Carlton Terrace	- 44 to 36 Station Road
- Units to rear of 30	(newly built unit since	- 53 Boundary Road
Station Road	local plan)	- 54 Boundary Road
(not in main	- 94-100 Boundary Road	- 55 Boundary Road
shopping street)	(mix of units newer	(aside from post office rest of
	included in the frontage)	frontage peripheral to primary
Secondary Frontage		frontage with less footfall)
- 3 to 19 Victoria		

Proposed Changes Boundary Road /Station Road District Centre		
Deletions	Additions	Frontage change
Road (mainly		
residential)		
- 428 to 420 Portland		
Road (peripheral		
units to centre)		
- Portslade United		
Reformed Church,		
St Aubyns Road		
(peripheral to		
centre)		
- 59 to 87 Station		
Road		
- 1 Wellington Road		
- 1 to 17 Boundary		
Road		
(Peripheral units to		
centre and large		
amount of		
residential)		

St James's Street District Centre





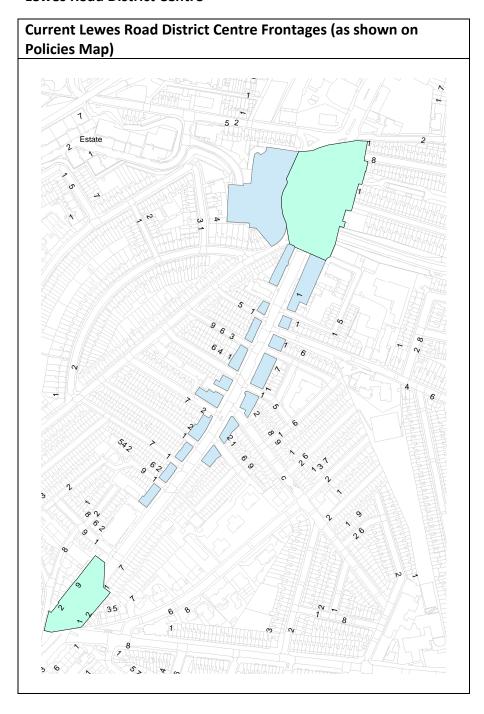
Proposed Changes: St James's Street District Centre

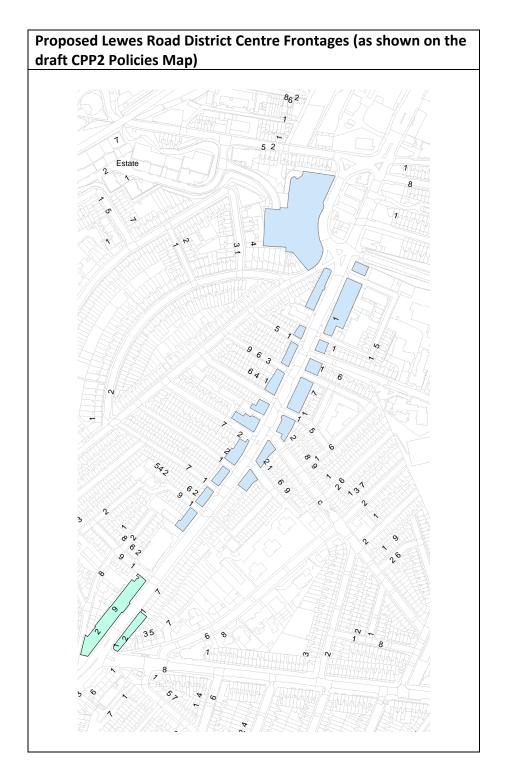
Additions

Secondary Frontage

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

Lewes Road District Centre





Proposed Changes: Lewes Road District Centre			
Deletions	Additions	Frontage change	
Secondary Frontage	Secondary Frontage	Secondary to Primary	
- 94 Lewes Road	- 18 to19 Lewes Road	- 123C Lewes Road (large	
- 95 Lewes Road	(funeral directors unit	fronted unit offering	
- 96 Lewes Road	currently excluded from	potential for footfall to	
- 97-104 Lewes Road	any frontage)	rest of centre)	
- 106 Lewes Road			
- 110 to111 Lewes Road			

Proposed Changes: Lewes Road District Centre		
Deletions	Additions	Frontage change
- 120 to 122 Lewes road		
- 123 Lewes Road		
(units felt to be peripheral		
to rest of centre		
interspersed with student		
accommodation)		

Local Centres

Portland Road, Hove





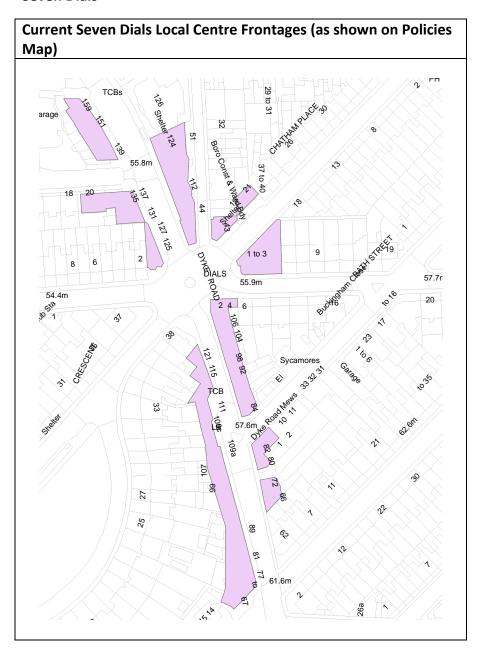
Proposed Changes to Portland Road Local Centre

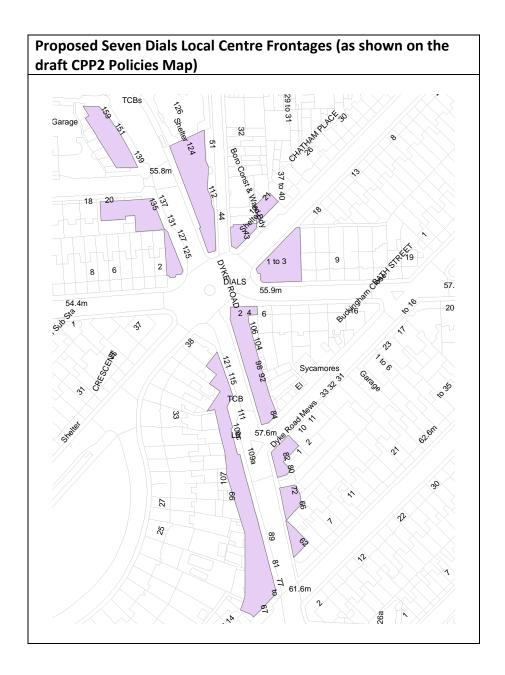
Additions

- 167 185 Portland Road
- 208 288 Portland Road

(good mix of units to include in centre)

Seven Dials



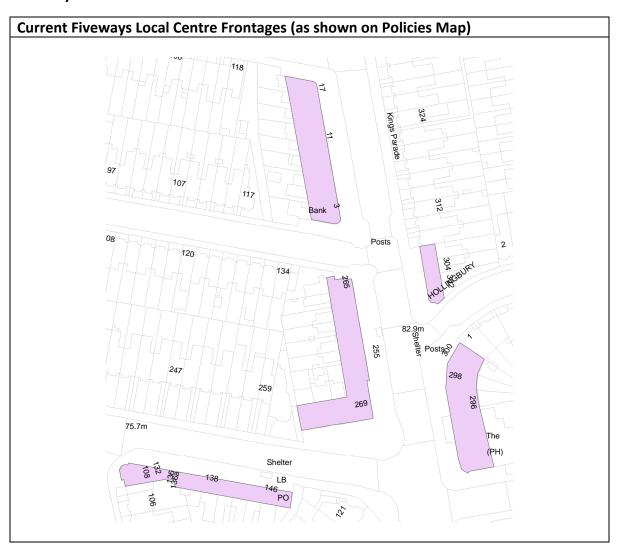


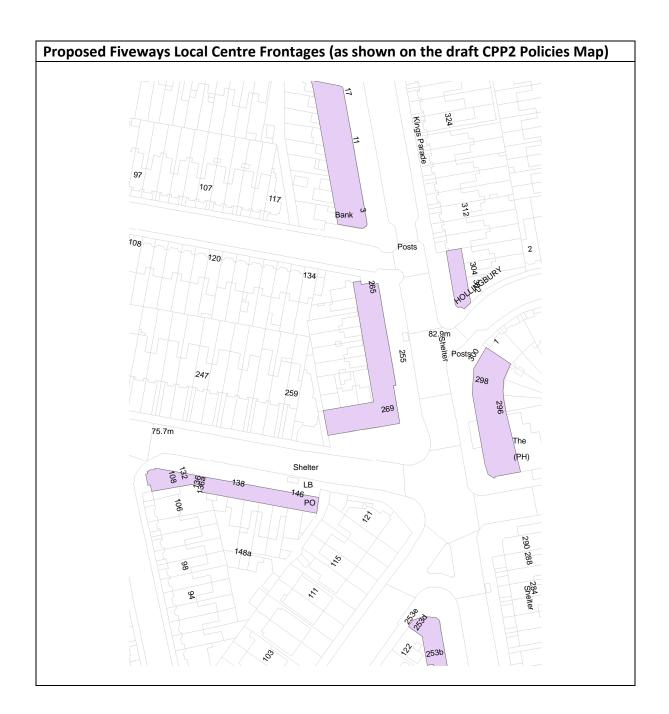
Proposed Changes: Seven Dial Local Centre

Additions

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

Fiveways





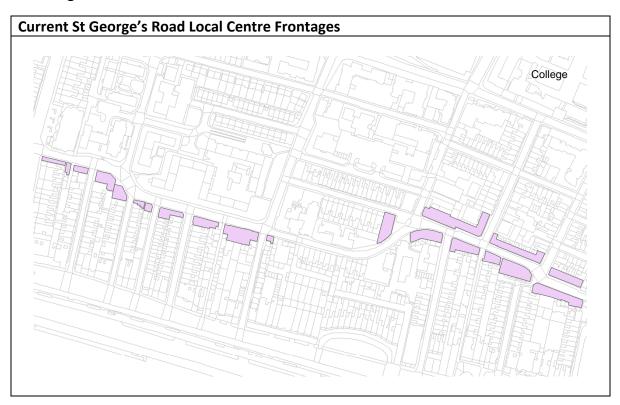
Proposed Changes: Fiveways Local Centre

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)

St George's Road



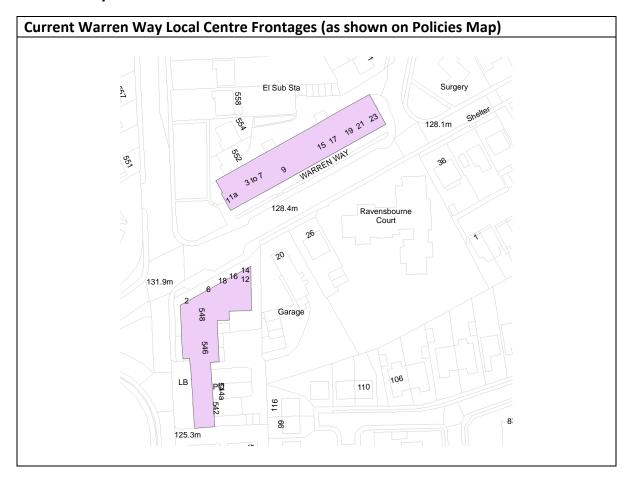


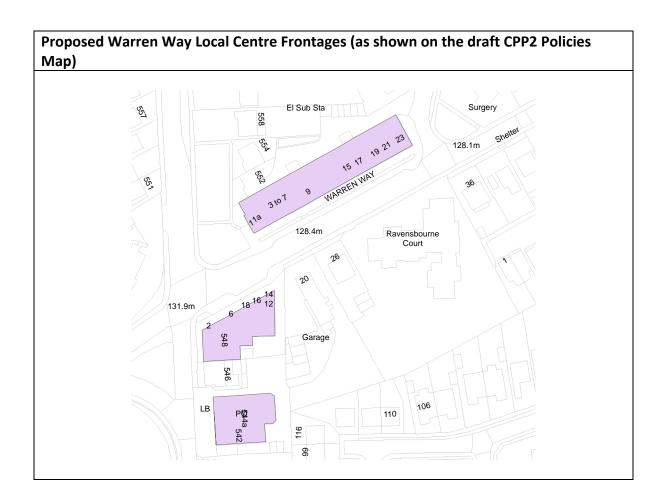
Proposed Changes: St George's Road Local Centre

Additions

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

Warren Way



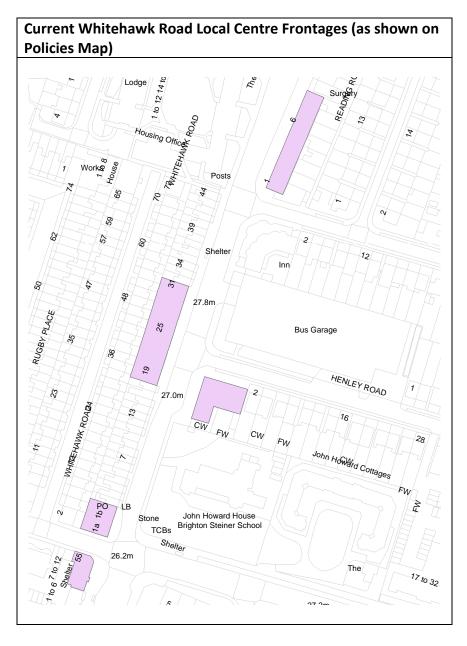


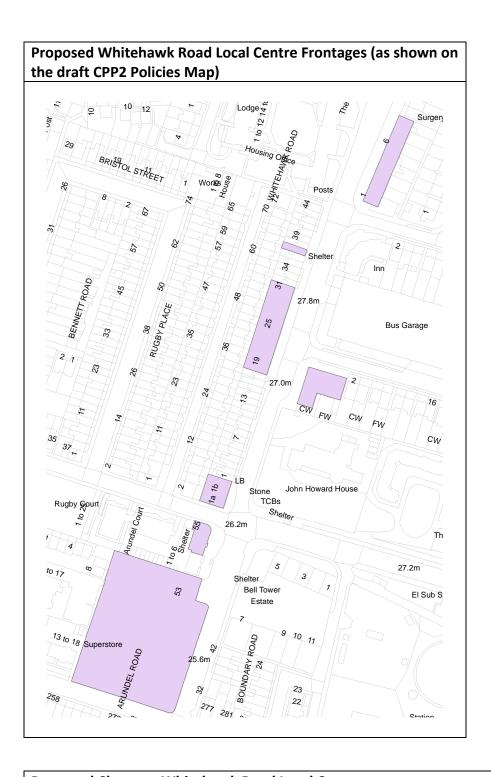
Proposed Changes: Warren Way Local Centre

Deletions

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

Whitehawk Road



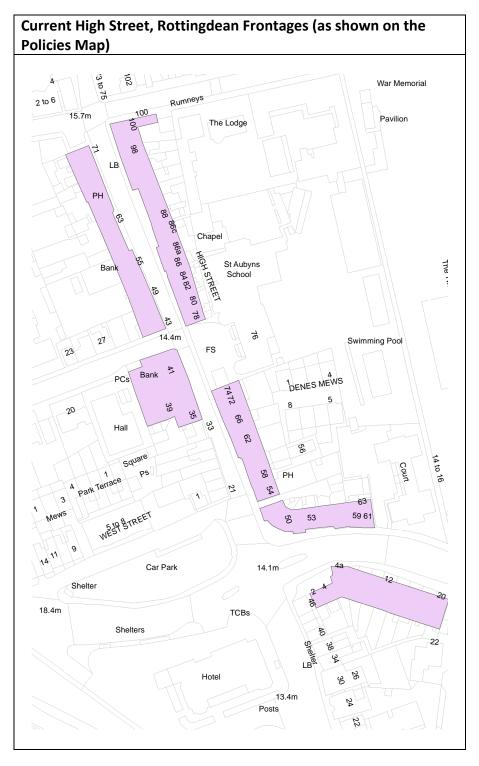


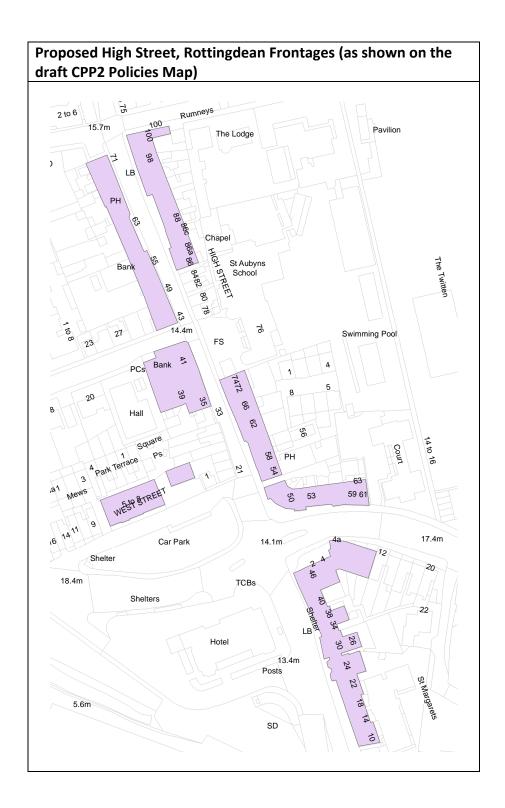
Proposed Changes: Whitehawk Road Local Centre

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)

High Street, Rottingdean





Proposed Changes Assessed and Agreed

Deletions	Additions
- 12 to 20 Marine Drive	- 2 to 8 West Street (Tesco and another unit)
- 78 to 84 High Street	- 46 to 10 High Street (additional units in the
(predominately residential	centre that were never included in the
units)	designation but contribute to vitality and
	viability of centre)

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

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

Appendix 2 provides an overview of the above assessments.

Assessment of New Local Centres

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. Recognising the importance of local centres to 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 for the new Brunswick Town Centre would suggest the in its current state that local centre would not be policy compliant with the thresholds set out in City Plan Part Two (44% 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.

Designation of Important Retail Parades

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.

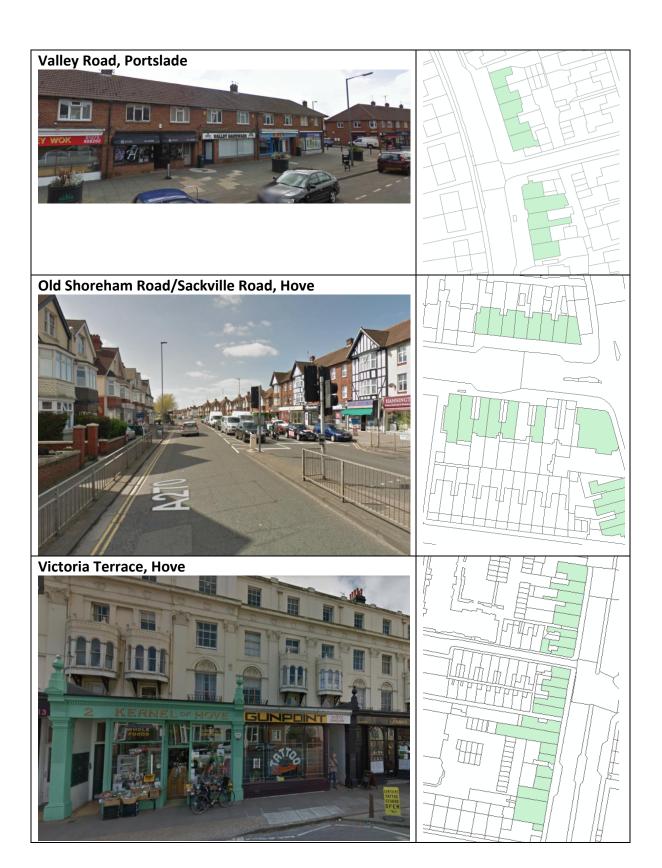
An assessment was undertaken during May and June of 2017 to identify parades which could have the potential to be designated as Important Retail Parades in City Plan Part 2. An assessment of the parades regarding the following was undertaken;

- 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?

Appendix 3 sets out the assessment undertaken for 34 parades identified across the City. Out of the 34 parades assessed it was concluded that 9 could be designated as Important Retail parades in City Plan Part 2.

For the reasons set out in Appendix 3 the following parades were identified as meeting the criteria to be designated as Important Retail Parades in City Plan Part 2;









Warren Road, Woodingdean





Cowley Drive, Woodingdean





Appendix 1 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.

Appendix 2 - Summary Assessment of Centres

Shopping Cer	ntre	Frontage Type	% of A1 from 2015/2016 Health Check	LP 2005 %	2015/16 health check Compliant with LP 2005	Proposed % for CPP2	2015/2016 % Compliant with CPP2	% from 2017 Health Check re LP 2005 designation	2017 % CPP2 Proposed Policy Compliant	% with agreed 2017 Suggested Changes	Changes CPP2 Policy Compliant
		Whole Centre	67%					67%	N/A	69%	N/A
Regional Cen	tre	Primary Frontage	76.2%	75%	Yes	75%	Yes	76%	Yes	76%	Yes
		Secondary Frontage	54.9%	Healthy Balance & Mix Required	Yes	35%	Yes	54%	Yes	55%	Yes
		Whole Centre	56.6%	-	-	-	-	51%	N/A	57%	N/A
Town Centres	London Road	Primary Frontage	59.4%	50%	Yes	50%	Yes	56.5%	Yes	57.3%	Yes
		Secondary Frontage	50.8%	Healthy Balance & Mix Required	Yes	30%	Yes	44%	Yes	43.7%	Yes

Shopping Cer	ntre	Frontage Type	% of A1 from 2015/2016 Health Check	LP 2005 %	2015/16 health check Compliant with LP 2005	Proposed % for CPP2	2015/2016 % Compliant with CPP2	% from 2017 Health Check re LP 2005 designation	2017 % CPP2 Proposed Policy Compliant	% with agreed 2017 Suggested Changes	Changes CPP2 Policy Compliant
		Whole Centre	52.8%								
	Hove	Primary Frontage	62.6%	50%	Yes	50%	Yes	62.6%	Yes	63.9%	Yes
		Secondary Frontage	43.7%	Healthy Balance & Mix Required	No	30%	Yes	41%	Yes	45.3%	Yes
District	St James's	Whole Centre	55%					55%	N/A	55%	N/A
Centres Street	Street	Primary Frontage	62.6%	50%	Yes	50%	Yes	59%	Yes	59%	Yes

Shopping Cer	ntre	Frontage Type	% of A1 from 2015/2016 Health Check	LP 2005 %	2015/16 health check Compliant with LP 2005	Proposed % for CPP2	2015/2016 % Compliant with CPP2	% from 2017 Health Check re LP 2005 designation	2017 % CPP2 Proposed Policy Compliant	% with agreed 2017 Suggested Changes	Changes CPP2 Policy Compliant
		Secondary Frontage	53%	Healthy Balance & Mix Required	Yes	30%	Yes	53%	Yes	56%	Yes
		Whole Centre	55.2%	-	-	-	-	54%	N/A	60%	N/A
	Boundary Road/Station Road	Primary Frontage	67%	50%	Yes	50%	Yes	65.2%	Yes	64.6%	Yes
		Secondary Frontage	45.2%	Healthy Balance & Mix Required	No	30%	Yes	43.8%	Yes	55.6%	Yes
Local Centres	Mill Lane, Portslade	Whole Centre	75%	65%	Yes	50%	Yes	63%	Yes	63%	N/A

Shopping Cen	Shopping Centre		% of A1 from 2015/2016 Health Check	LP 2005 %	2015/16 health check Compliant with LP 2005	Proposed % for CPP2	2015/2016 % Compliant with CPP2	% from 2017 Health Check re LP 2005 designation	2017 % CPP2 Proposed Policy Compliant	% with agreed 2017 Suggested Changes	Changes CPP2 Policy Compliant
	Portland Road, Hove	Whole Centre	67%	65%	Yes	50%	Yes	63%	Yes	63%	Yes
	'The Grenadier', Hangleton Road	Whole Centre	65.6%	65%	Yes	50%	Yes	58%	Yes	n/a	n/a
	Richardson Road, Hove	Whole Centre	86.7%	65%	Yes	50%	Yes	86%	Yes	n/a	n/a
	Eldred Avenue, Withdean	Whole Centre	75%	65%	Yes	50%	Yes	75%	Yes	n/a	n/a
	Old London Road, Patcham	Whole Centre	66.7%	65%	Yes	50%	Yes	67%	Yes	n/a	n/a

Shopping Cen	itre	Frontage Type	% of A1 from 2015/2016 Health Check	LP 2005 %	2015/16 health check Compliant with LP 2005	Proposed % for CPP2	2015/2016 % Compliant with CPP2	% from 2017 Health Check re LP 2005 designation	2017 % CPP2 Proposed Policy Compliant	% with agreed 2017 Suggested Changes	Changes CPP2 Policy Compliant
	Ladies Mile Road, Patcham	Whole Centre	50%	65%	No	50%	Yes	44%	No	n/a	n/a
	Seven Dials	Whole Centre	54.8%	65%	No	50%	Yes	49%	No	51%	Yes
	Fiveways	Whole Centre	63.9%	65%	No	50%	Yes	64%	Yes	66%	Yes
	Hollingbury Place, Hollingdean	Whole Centre	50%	65%	No	50%	Yes	43%	No	n/a	n/a
	Beaconsfield Road, Preston Park	Whole Centre	54.5%	65%	No	50%	Yes	64%	Yes	n/a	n/a

Shopping Cen	itre	Frontage Type	% of A1 from 2015/2016 Health Check	LP 2005 %	2015/16 health check Compliant with LP 2005	Proposed % for CPP2	2015/2016 % Compliant with CPP2	% from 2017 Health Check re LP 2005 designation	2017 % CPP2 Proposed Policy Compliant	% with agreed 2017 Suggested Changes	Changes CPP2 Policy Compliant
	St George's Road, Kemp Town	Whole Centre	56%	65%	No	50%	Yes	58%	Yes	58%	Yes
	Warren Way, Woodingdean	Whole Centre	42.1%	65%	No	50%	No	42%	No	47%	No
	Whitehawk Road, Whitehawk;	Whole Centre	57.7%	65%	No	50%	Yes	50%	Yes	n/a	n/a
	High Street, Rottingdean	Whole Centre	49%	65%	No	50%	No	47%	No	57%	Yes
	Lustrells Vale, Saltdean	Whole Centre	52.9%	65%	No	50%	Yes	53%	Yes	n/a	n/a

Shopping Ce	ntre	Frontage Type	% of A1 from 2015/2016 Health Check	LP 2005 %	2015/16 health check Compliant with LP 2005	Proposed % for CPP2	2015/2016 % Compliant with CPP2	% from 2017 Health Check re LP 2005 designation	2017 % CPP2 Proposed Policy Compliant	% with agreed 2017 Suggested Changes	Changes CPP2 Policy Compliant
	Longridge Avenue, Saltdean	Whole Centre	57.1%	65%	No	50%	Yes	57%	Yes	n/a	n/a

Assessi	ment of Possible N	lew Local Shopping C	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

Appendix 3 – 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

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
						close to Boundary Road/Station Road District shopping centre
4. Cowley Drive Woodingdea n	No 5	Yes	Yes	Yes	Yes	Whilst conversion of two shops into large pharmacy has resulted in only 5 units in the parade, the 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	Yes	Yes	Yes	Yes	Yes - but could	Good mix of services and retail

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
Villas Hove	17				designate as a local centre as large and will be essential when DA6 area built as population of local area will change	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 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 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.

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
						Although convenience store would provide for some day to day needs overall retail provision considered poor.
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 is 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

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
15 Maghio	No	Vac	Vac	No	No	Local Centre
15. Mackie Avenue Patcham	No 4	Yes	Yes	No	No	Although convenience store may provide for some local residents 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/Davigd or 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 allocated as an important parade in view of the development proposals at Sackville Trading Estate.
19. Western End of Portland	Yes 8	Yes	Yes	Yes	No	Although convenience stores may provide for some local

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
Road Hove						residents day to day needs, overall retail offer considered poor This parade is close enough 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	Yes	Yes	Yes	Yes – but 2	No	Although convenience stores

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
Road Hove	9			currently vacant		may provide for some local residents day to day needs, 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.
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

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
						increase residential and A1 retail provision.
29. Warren Road Woodingdea n	Yes 27	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 7	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,	Yes 7	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
junction with Patchdean						day to day needs, overall retail offer considered poor
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

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

