

Gedling Borough Council

Response to Matter 13

Retail

Issue 13a: Retail Development Strategy

Q1. Do the retail proposals in Policies LPD 48 to LPD 56 fit with the overall strategy for retail development in the ACS?

- 13.1 Yes, it is considered that the retail Policies LPD 48 – 56 fit with the overall strategy for retail development in the ACS.
- 13.2 Policy 6 of the ACS sets out:
- The retail hierarchy and network of centres in Gedling Borough;
 - That the boundaries of centres, primary shopping areas and sites for main town centres uses to meet identified needs will be set out in Part 2 Local Plans;
 - New centres of neighbourhood importance including at the Gedling Colliery site;
 - The principle of maintaining and enhancing the vitality and viability of centres including the need to widen the range of uses;
 - That certain centres are in need of enhancement including Carlton Hill and Netherfield;
 - That main town centre uses should be located in centres and proposals for main town centre uses will need to be subject to the sequential test.
- 13.3 LPD 48 sets out the retail hierarchy and the boundaries of centres are defined on the Policies Map. The list of town centres and local centres is consistent with Policy 6 of the ACS however; one difference is that Carlton Square which is identified as a District Centre in the ACS is defined as a Local Centre in the LPD. The explanation for this change is set out in question 4 below.
- 13.4 The ACS Policy 6 includes the Gedling Colliery site as a Local Centre. The Council has resolved to grant full planning permission for the first 506 homes subject to the signing of a Section 106 Agreement and outline planning consent for subsequent phases including the development of up to 1050 homes and a neighbourhood centre. No comments were received about LPD Policy 48.
- 13.5 LPD 49 sets out the approach to development within the boundaries of the town and local centres as defined on the Policies Map. This Policy seeks to maintain a range of uses in each centre whilst protecting the core retail character. Previously the GBRLP set an overall percentage of 35% for non-A1 uses (A2, A3, A4 and A5) whilst the new approach will allow up to 55%.

This is considered consistent with ACS Policy 6 which seeks to encourage a greater range of town centre uses whilst protecting the prime retail function. The basis for the varying percentages is set out in the Retail Background Paper (**LPD/BACK/04**).

- 13.6 Proposed changes **MM44 (EX/10A)** seeks to reduce the % of A5 uses in Arnold, Calverton and Netherfield to 5% due to evidence that obesity rates in the surrounding residential areas are significantly higher than average (see answer to Question 5).
- 13.7 Part b) of Policy LPD 49 seeks to prevent an unacceptable grouping of non-A1 uses within the primary shopping areas of the centres. This is in order to avoid “dead frontages” and to protect the strong retail character as required by ACS Policy 6.
- 13.8 Arnold is the only centre large enough to have a secondary shopping area and hence the need for policy coverage. The purpose of LPD 49 c) is to ensure that the majority of the secondary area is retained for main town centre uses that complement the Arnold primary shopping area.
- 13.9 LPD 50 Upper Floors – this policy encourages the reuse of upper floors for residential and other uses consistent with the NPPF and ACS Policy 6. No comments were received about this policy.
- 13.10 LPD 51 Impact Assessment Threshold – the threshold for the requirement for a retail impact assessment is set at 2,500 sq. m in the NPPF which allows local planning authorities to set a local threshold where there is justification. The 2015 Retail Study (**LPD/RET/01**) recommended a threshold of 500 sq. m see paragraph 17.24 to 17.27. The Revised Schedule of Changes to the LPD (**EX/10A**) includes **MM45** as a helpful clarification that the size of the retail unit will be assessed using its gross external area. There was one comment on this policy which supported the threshold.
- 13.11 LPD 52 Markets – this policy recognises that markets perform an important role in the retail sector and enhance vitality and viability. There were no comments on this policy.
- 13.12 LPD 53 Development within Small Parades – this policy recognises that small parades of shops can play an important role in meeting peoples’ day to day needs and small scale retail proposals without having to comply with the sequential test. No comments were received about this policy.
- 13.13 LPD 54 Fast Food Takeaways – this policy seeks to help address obesity issues see response to Question 7 below.
- 13.14 LPD 55 Security Shutters – this policy provides design guidance on security shutters to help protect the character and appearance of shopping centres. One comment was received from a heritage body welcoming this policy.

Q2. Is the retail hierarchy of town, district and local centres consistent with the ACS?

- 13.15 Policy 6 of the ACS sets out the retail hierarchy with Arnold established as a town centre, Carlton Square as a District Centre and Burton Joyce, Calverton, Carlton Hill, Gedling Colliery/Chase Farm, Gedling Village, Mapperley Plains, Netherfield and Ravenshead identified as local centres. Accordingly the various centres are identified in LPD 48 the only difference being that Carlton Square is defined as a local centre. Please see Question 4 for an explanation.
- 13.16 The 2015 Retail Study confirms that Arnold is a large centre with a good mix of retail and service uses. The other centres all support day to day shopping needs and perform the role of local centres.

Q3. On what basis have the boundaries of the town and local centres been altered?

- 13.17 The details of boundaries changes are set out in the Retail Background Paper (**LPD/BACK/04**). Minor changes are proposed for some centres namely Arnold and at Carlton Hill to reflect better features on the ground and in order to follow clearly distinguishable boundaries. Some extensions to town centre boundaries have been made so as to incorporate facilities such as libraries and other community centres associated closely with the existing centre as these are now defined by the NPPF as main town centre uses and logically should be within the centre for example, at Burton Joyce and Netherfield. The boundary changes proposed in the LPD are summarised below:
- 13.18 Arnold Town Centre – minor changes are proposed to align the town centre boundary with a car park.
- 13.19 Burton Joyce – boundary to be amended to include Burton Joyce Library within the town centre as it is a main town centre use and will consolidate the centre.
- 13.20 Calverton – it is proposed to include the vacant and derelict land to the south of the centre. This would provide the opportunity for the site to be developed for town centre uses. It is also proposed to include the restaurant located to the West of Mansfield Lane into the town centre as this is a main town centre use appropriately located and would support the vitality and viability of the centre.
- 13.21 Carlton Hill – a minor amendment is proposed to align with the extent of a car park.
- 13.22 Carlton Square – It is proposed to include the Police Station on Cavendish Road within the town centre reflecting its community use and also to provide an opportunity site for redevelopment for retail or town centre uses should it become available to secure the ongoing vitality, variety and health of the

centre. The area of open space adjacent Tesco will also be included as it is a more logical boundary.

13.23 The area to the north of Burton Road is proposed to be removed based on the recommendation of the 2015 Retail Study. This area is run down with little potential for redevelopment for retail or town centre uses. A minor change is to exclude the small area to the west of Carlton Square beyond the Tesco store as it is isolated from the main shopping centre.

13.24 Netherfield – the main proposal is to include the cluster of community uses including St Georges Centre located to the south of the centre. The basis for this is to include main town centre uses within the defined town centre. The former Ashwell primary school will also be included as it is adjacent the existing centre and has planning permission for a health centre and pharmacy.

Q4. What evidence is there to support the designation of Carlton Square as a local centre rather than a district centre in Policy LPD 48?

13.25 Carters Jonas was commissioned by Nottingham City in partnership with Broxtowe Borough, Gedling Borough and Rushcliffe Borough to update the retail evidence base contained in the 2008 Retail Study. The study brief for the 2015 Retail Study (**LPD/RET/01**) was specifically asked to:-

- Evaluate the existing network and hierarchy of retail centres and recommend any changes to their position within the hierarchy.

13.26 The 2015 Retail Study carried out updates of the town centre health checks previously undertaken in the 2008 Retail Study. This approach allowed changes between 2008 and 2015 to be identified. Based on the Planning Policy Practice Guidance key performance indicators (KPIs) were identified for Arnold and Carlton Square which are set out in paragraph 8.3 of the 2015 Retail Study and reproduced below:-

- scale and diversity of uses;
- retailer representation and demand;
- commercial property indicators (such as Prime Zone A Rents);
- changes in vacancy levels;
- accessibility and parking provision;
- the quality of the town centre environment;
- pedestrian footfall; and
- customers' views and behaviour.

13.27 The updated KPIs have assisted in assessing the strengths and weaknesses of Carlton Square; opportunities for development and potential threats. The health checks were based on a variety of information including monitoring data from the Council and also backed up by the consultants carrying out site visits and using their specialist knowledge.

13.28 In terms of the overall assessment, Carlton Square suffers from a limited offer and layout being split into two distinct parts based on the Tesco store in the

west and the out dated precinct in the east. Its catchment is constrained by the presence of Netherfield and Gedling Local Centres which are nearby and it is generally too small to attract large retailers. In terms of Carlton Square, the 2015 Retail Study concludes that “Even if improvements were made to Carlton Square it is currently functioning more like a local centre than a District Centre and we advise that the retail hierarchy should be reviewed accordingly.”

13.29 The Council has successfully bid for funding to prepare a retail feasibility study to assess demand for particular types of retail/commercial space; and also to appoint an architect to draw up detailed designs for retail space, Public Square and social housing to support a planning application. This project builds on previous work commissioned by the Council for an options appraisal to look at development opportunities. The Council has recently acquired part of the site to enable reconfiguration and improvement of Carlton Square and funding has been secured from Nottinghamshire County Council Pre-Development Fund to progress designs for a mixed use scheme. The preferred option is to reconfigure the Council owned car parking and find space to develop two new retail units/restaurant and public space for a new market.

13.30 The above project complements wider regeneration plans to convert DBH House a former office building into starter apartments and also plans by Gedling Homes to re-clad the two apartment blocks adjacent the town centre on Station Road to follow a similar design scheme as DBH House. This will bring much needed housing into the area and also improve the quality and appearance of the existing buildings which are somewhat “tired” and providing a more unified design.

Q5. On what basis have the maximum levels of non-A1 uses within the Arnold Primary Area and the Local Centres been calculated in Policy LPD 49?

13.31 The basis of the maximum levels of non-A1 uses is set out in the Retail Background Paper (**LPD/BACK/04**). The maximum levels of non-A1 uses in Arnold Primary Area and the Local Centres are based on figures chosen following a review of the existing percentages of A2, A3, A4, A5 and a single percentage figure for other uses in these centres (see the retail health checks in (**LPD/RET/01**)). Generally they allow for a greater mix of uses allowing up to 55% of non-A1 uses. This is in contrast to the previous policy where non-A1 uses were restricted to 35%.

Q6. What is the Plan doing to enhance the vitality and viability of Arnold, Carlton Hill and Netherfield, which the ACS, in Policy 6, considers to be in need of enhancement or underperforming?

Arnold

13.32 The 2015 Retail Study which has informed preparation of the Local Planning Document identifies Arnold Town Centre as having a good mix of retail and service uses and as having adjusted to the economic downturn. This is

evidenced by a review of the changes in occupancy seen over time. The Primary Shopping Area has experienced considerable change since 2005 (and an overall increase in vacancies from 5 to 9), but there is no evidence of long term vacancies, and most units have been reoccupied relatively quickly. Similarly, in the Secondary area, there has been a large number of changes in terms of occupiers over the last decade, with vacant units (which have increased from 3 to 5) being reoccupied by new businesses. It is also of note that where units have changed hands, the majority have been in the independent sector but new multiples (including Boyes, Costa and George clothing) have also opened.

- 13.33 Policy LPD52 (Markets) of the emerging Local Planning Document (Local Plan part 2) recognises that markets have played an important part in the development of towns and cities in England and continue to play an important role in the retail sector. They offer a place for small independent traders to operate from and increase the vitality and viability of town centres.
- 13.34 The Council is actively seeking to enhance Arnold town centre and the Council has been successful in securing funding from Nottinghamshire County Council's Pre-Development fund to progress options for the improvement of Arnold Town Centre.

Carlton Hill

- 13.35 The 2015 Retail Study health centre check provides an overall assessment that this is a reasonably strong centre with a good range of uses and a low vacancy rate that serves the local area well and an improvement on past performance. The latest 2016 Annual Shopping Survey indicates that the vacancy rate has reduced from 5% to 4% with the diversity of uses being broadly the same as the 2015 Health Check in Appendix 1 of the Retail Background Paper (**LPD/BACK/04**) where A1 uses represent just over 50% of the shopping frontage. As stated above Policy LPD 49 provides flexibility to allow up to 55% of non-A1 uses to allow for more diversity.

Netherfield

- 13.36 The 2015 Retail Study provides an overall assessment that the centre has a good mix of uses and serves the local population well although stores tend to be at the lower end of the market. Vacancy rates have improved recently but improvement in the quality of the built facilities may be possible. The boundary change proposed in the LPD will incorporate the cluster of community uses including the St. Georges Centre within the town centre as this is a main town centre use appropriately located and would support the vitality and viability of the centre.
- 13.37 A successful bid has been made securing funding from Nottinghamshire County Council's Pre-development Fund to prepare a feasibility study/business case for extra train services on the Nottingham to Grantham rail line. This line also serves Netherfield and the station is on the edge of the centre. Part of the business case will be to demonstrate the benefits of more

passengers using the service from Netherfield and the economic spin off from increased foot flows within the centre. Funding is also being sought for masterplanning work that will look at site options for potential development sites in particular to increase the retail offer and additional retail floorspace.

Q7. On what basis does Policy LPD 54 restrict A5 uses within 400m of a secondary school?

- 13.38 The basis of evidence for restricting A5 uses within 400 m of a secondary school is set out in the Retail Background Paper Addendum (**LPD/BACK/05**). This sets out the basis for planning policy to address health and wellbeing as set out in the NPPF. Policy context is also provided by the Health and Wellbeing Strategy produced by the Nottinghamshire Health and Well Being Board. This board has produced a spatial framework to achieve public health gains. A key instrument of this is the Health Impact Assessment Checklist used to assess the Local Planning Documents and also major planning applications. One of the issues considered in the Health Impact Checklist is restrictions to A5 uses in specific areas.
- 13.39 Evidence of links between obesity and fast food takeaways is also referenced in Retail Background Paper Addendum notably:-
- Burgoine (2014)
 - Davis B and Carpenter (2009)
- 13.40 These studies generally found that greater on average consumption of fast foods and obesity corresponds to the exposure to fast food outlets. The Nottinghamshire Joint Strategic Needs Assessment estimates that within Nottinghamshire there are currently 37,000 children aged between two and fifteen classified as obese. It is considered that 400 m is generally considered to be within walking distance where MM47 proposes clarification that the distance will be measured as a 400 m radius from the school gate.
- 13.41 Analysis of recent planning applications indicates that no A5 uses have been permitted within 400 m of a secondary school between 2011/12 and 2015/16 and that there are only 3 existing A5 takeaways within the 400m limit. It is considered appropriate to maintain the current situation. Similar policies have been included in local plans elsewhere that have been found “sound”, for example, the Bristol City Council’s Site Allocations and Development Management Policies Local Plan (July 2014)¹, Policy DM10.

Extract from Policy DM10:-

“Development of food and drink uses will be acceptable provided that they would not harm the character of the area, residential amenity and/or public safety, either individually or cumulatively. Proposals which would result in a harmful concentration of food and drink uses will not be permitted.”

¹ <https://www.bristol.gov.uk/planning-and-building-regulations/local-plan>

Q8. Would the additional text proposed to Policy LPD 54 be effective, given the use of the word ‘unacceptable’?

13.42 The proposed change (**MM46**) is a response to comments from Nottinghamshire County Council Public Health who raised concerns around the clustering of A5 units. The proposed wording is as follows:

“Outside of the identified Town and Local Centres, planning permission will not be granted for proposals which would create an unacceptable grouping of A5 units.”

13.43 The Report of Consultation (**LPD/REG/04**) sets out the basis for the wording as being similar to that used to prevent unacceptable grouping of non-A1 uses in town centres and it is not considered appropriate to identify a specific number of A5 units as this can be assessed on a case by case by basis having regard to the nature of the location and the number of fast food outlets already present. The Bristol example referred to above is similar by referring to a “harmful” concentration.

Conclusion

13.44 It is considered that there is a good fit between the LPD Policies LPD 48 to LPD 56 and the strategic policy context provided by ACS Policy 6. The LPD defines the network and hierarchy of centres identified in the ACS Policy 6 and defines them geographically on the Policies Map. The one difference being Carlton Square which is defined as a Local Centre in the LPD as opposed to a District Centre in the ACS. This change is based on recommendations of the Retail Study 2015 completed after the adoption of the ACS. The Council is actively involved in consolidating the role of Carlton Square as a local shopping centre.

13.45 The LPD introduces the scope for a greater range of non-A1 uses in the various centres whilst seeking to protect their core retail function. The Council is pursuing various initiatives to enhance the viability and vitality of Arnold, Carlton Hill, Carlton Square and Netherfield.

13.46 Obesity is a significant issue in some parts of Gedling Borough and the Council considers that the LPD should support strategies to help improve health and wellbeing in line with the NPPF. The addendum to the Retail Background Paper sets out evidence of links between obesity and the location of fast food takeaways and Policy LPD 54 would apply appropriate planning controls over the location of takeaways close to schools and over their clustering.

Further Proposed Changes

13.47 No further proposed changes are being put forward at this stage.