

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

Shopping Frontage Review

April 2020



Brighton & Hove
City Council

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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 (CPP2), 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'. These policies complement the Council's approach under adopted policy CP4 Retail Provision of City Plan Part One (CPP1) when determining planning applications. The paper has also been updated in light of consultation responses received during the draft CPP2 consultation.

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

Retail Trends and Consumer Habits in the UK

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 2017¹) 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 has 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.²

Whilst the proportion of internet sales have steadily increased, online retail spend still accounts for less than 20% of total retailing spending (2017)³. Services offering a 'customer experience' such as hairdressers or beauty salons have performed well (topped 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.⁴ 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 information.⁵

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.

¹ The Local Data Company (June 2018) Retail and Leisure Trends Report 2017/18

² Centre for Cities, City centres: past, present and future, February 2019

³ Grimsey, B. (July 2018) The Grimsey Review 2 'It's time to reshape our town centres' available from: <http://www.vanishinghighstreet.com>

⁴ <https://www.theguardian.com/cities/ng-interactive/2019/jan/30/high-street-crisis-town-centres-lose-8-of-shops-in-five-years>

⁵ Springboard and The NPD Group (2017) Retail Destinations: The Eating Out Opportunity

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 Revised National Planning Policy Framework (NPPF) 2018 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).

Historically, shops and other Class A uses⁶ 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;

⁶ 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.

- 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

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) (subject to prior approval)
- 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) (subject to prior approval)
- 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). [CD1] (subject to prior approval)

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

In October 2018 the Government announced a consultation on planning reform titled 'Supporting the high street and increasing the delivery of new homes'. This consultation ran from 29 October 2018 to 14 January 2019. The key changes introduced from this consultation to the permitted development rights in relation to town centres are as follows;

Shops to offices: The regulations introduce a new Permitted Development right which allows shops (A1), financial and professional services (A2), hot food takeaways (A5), betting shops, pay day loan shops and launderettes of up to 500 sqm to change to office use (B1). Prior approval is required which allows the local planning authority an opportunity to consider certain planning impacts, including the sustainability of existing shopping areas.

Takeaways to residential use: Existing Permitted Development rights allowing the change of use of up to 150 sqm of shops (A1), financial and professional services (A2), betting offices, pay day loan shops and launderettes to residential use (C3) are amended to also allow hot food take-aways (A5) to change to residential use (subject to prior approval).

Flexible uses: Existing Permitted Development rights allow a change of use from any Class A1, A2, A3, A5, B1, D1, or D2 use, “betting office”, or “pay day loan shop” to a temporary “flexible use” (i.e. A1, A2, A3, or B1) for a single continuous period of up to 2 years. As of May 2019 the new regulations amend these rights so that the temporary “flexible use” also includes specified community uses (exhibition hall, public library, museum, clinic or health centre, or art gallery (other than for sale or hire)), and extends the period of temporary use from two to three years.

Amendments to Use Classes: The government has announced that they will also seek to make amendments to the Use Classes Order in order to facilitate more flexibility on the high street and to ensure that mixed uses can operate without the need for planning permission. This has yet to be consulted upon as of November 2019.

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) 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 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.

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

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 have been made to policy DM12 which are summarised below;

- The name of the policy has been 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 has been 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 is 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 Laines to allow more flexibility for town centres uses other than A1 to open.
- The marketing requirement has been reduced from 12 months to 6 months in primary, secondary frontages and local shopping centres to try and ensure that the policy allows some flexibility and centres remain vibrant and viable with low vacancies.
- Clarification that residential uses would be permitted above unit 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.

It is noted that changes to permitted development rights PD rights have further changed as of May 2019 and the use class order is due to be consulted upon later in 2019. As it stands the policy has been altered to refer to A1 uses and non-A1 uses to try and future proof the policy. Whilst it is understood that PD rights do exist which allow certain changes of use it is understood that this does not apply in conservation areas (a fair amount of frontages within centres are also designated as being within conservation

areas). It is also understood that as part of the PD process that Prior Approval is required, which allows consideration of the impact on adequate provision of services, sustainability of key shopping areas, noise, and transport. Some of the PD rights can also be temporary (3 year) change of use.

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. 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.

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 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 Town and Country Planning (Use Classes) Order 1987 (as amended) as shown in the following table:

Use Class (as of 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 St George's Road, Kemptown Warren Way, Woodingdean Whitehawk Road, Whitehawk High Street, Rottingdean Lustrell's Vale, Saltdean	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)
	Longridge Avenue, Saltdean & Brunswick Town, Hove	
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

Health Checks 2018/2019 update

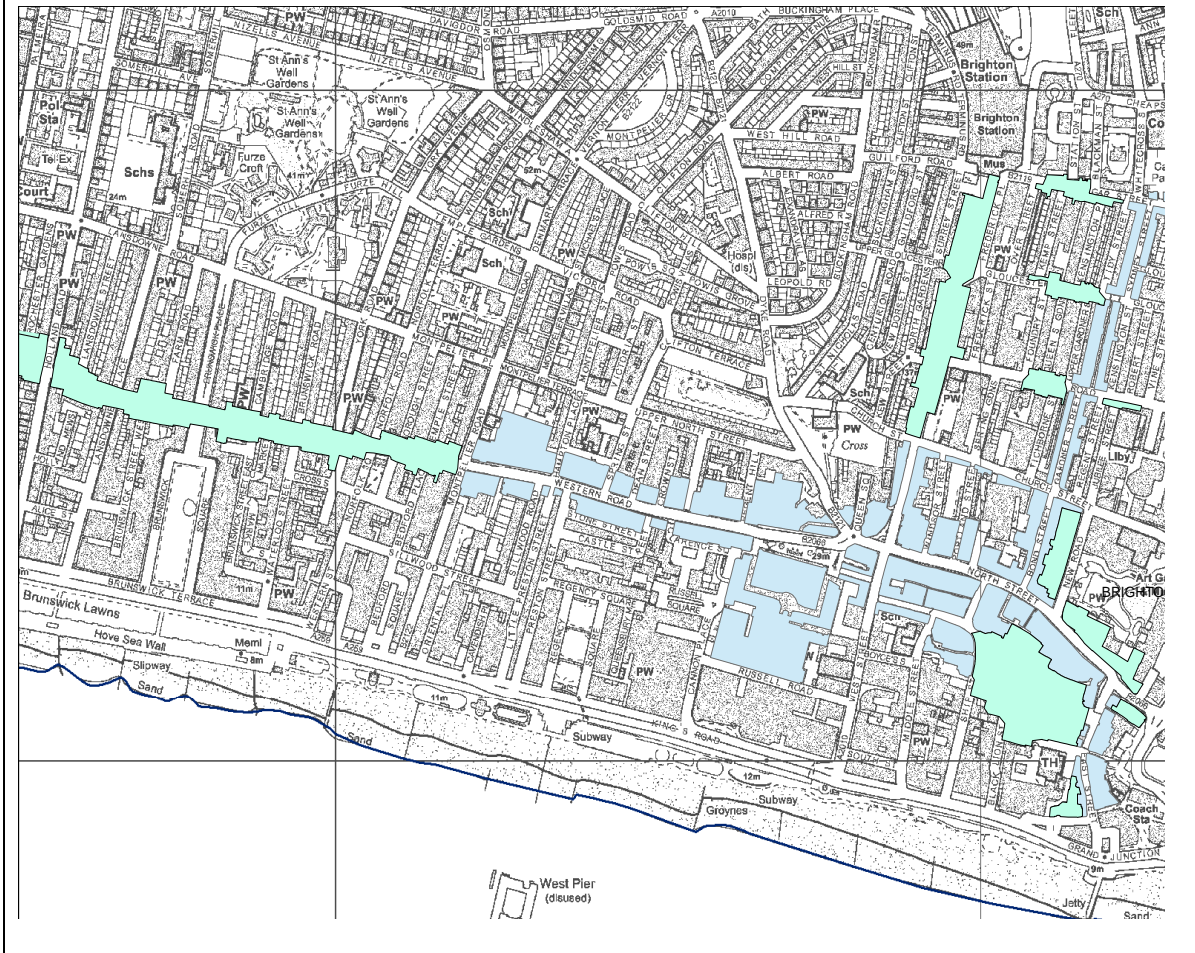
An update to the 2017 health checks was undertaken in late 2018 early 2019 to update the data held for each centre, in order to ensure that there were no fundamental differences between datasets. This updated data is reflected in Appendix 2 of this document.

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

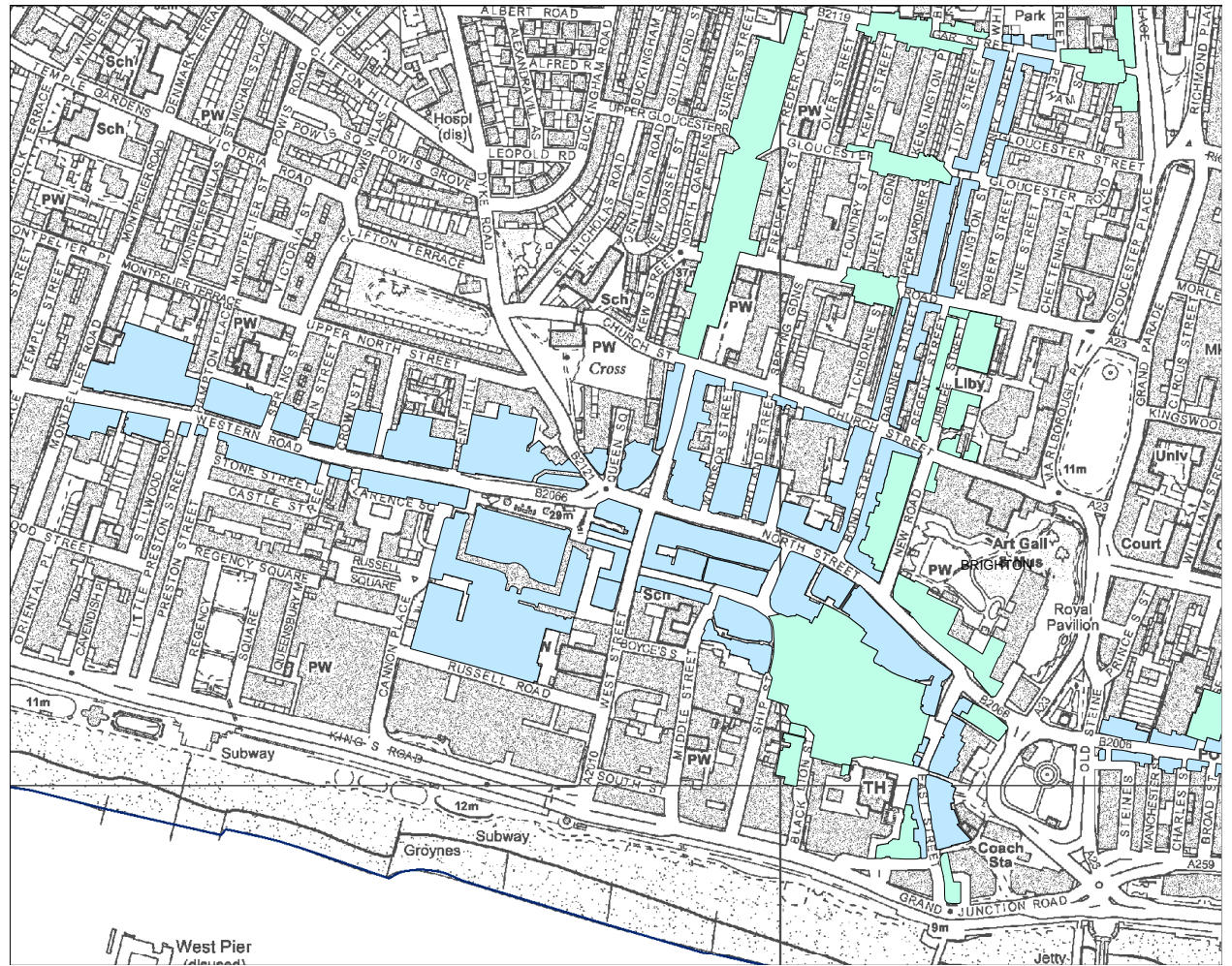
Regional Centre Assessment

(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>dwellings</i>) - 9a, 9b, 9c, 9d, 9e and 9F Little Western Street (<i>dwellings</i>) 	<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)

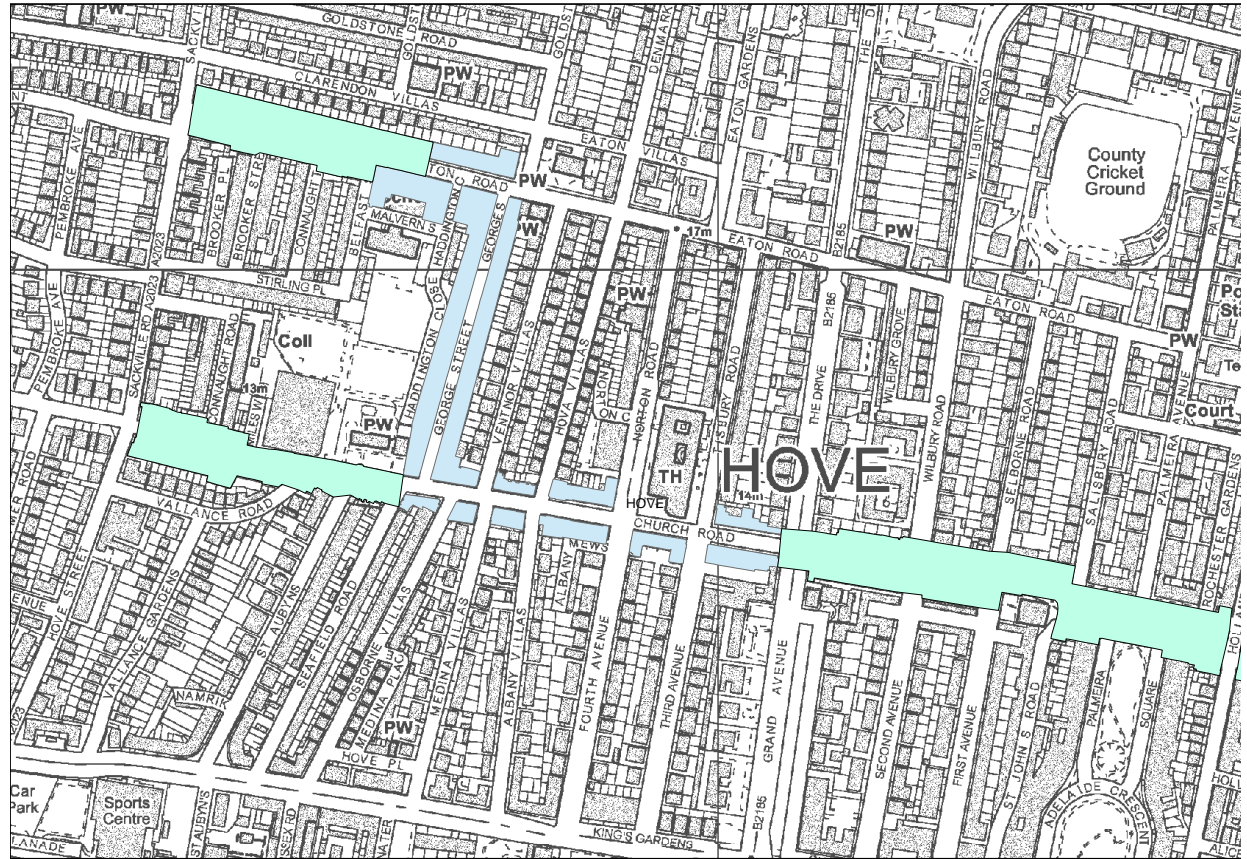
Summary: The proposed changes to the Regional Centre reflect the additional units built in new developments such as Trafalgar Street and Jubilee Street Brighton since the adoption of the Local Plan in 2005. Some frontage has been readjusted to be placed within other centres such as the new Brunswick 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

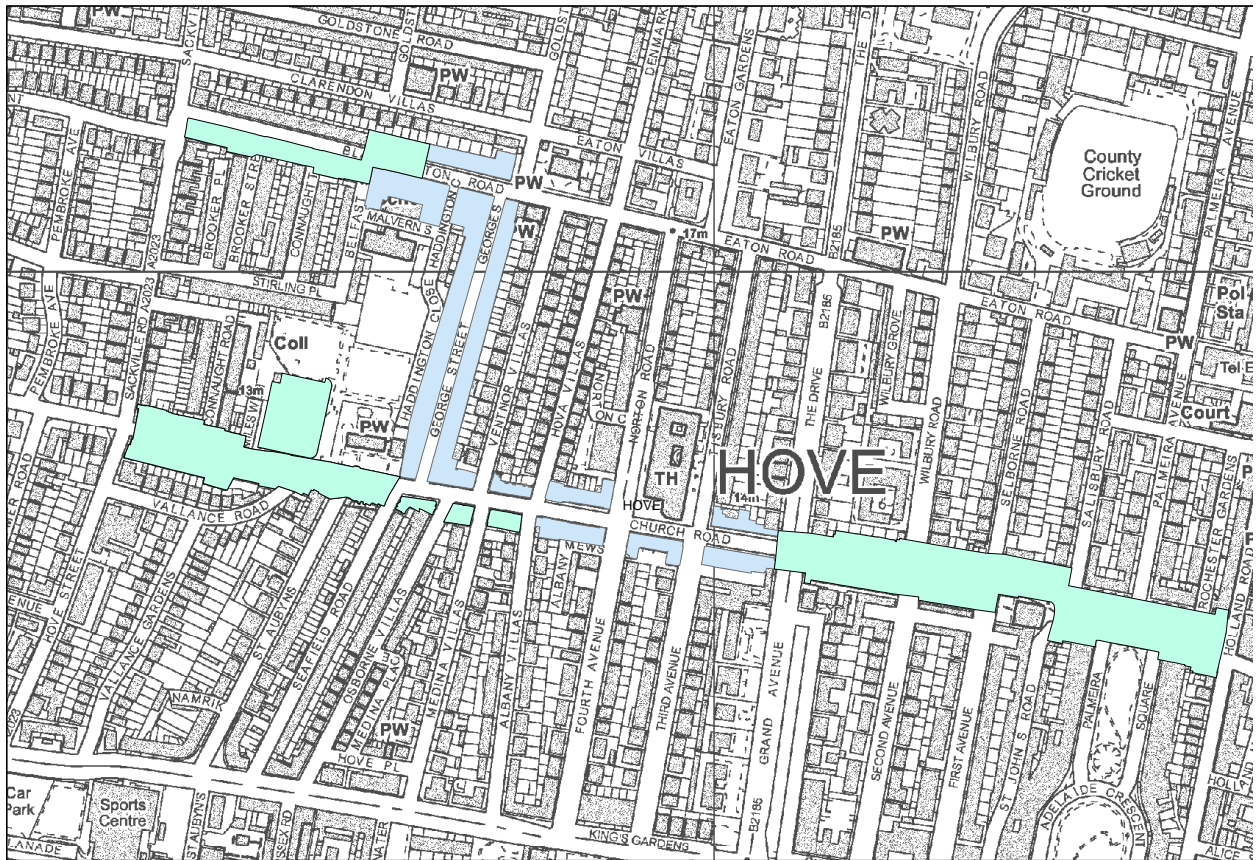
(Key - Light Blue = Primary Frontage, Light Green = Secondary Frontage)

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

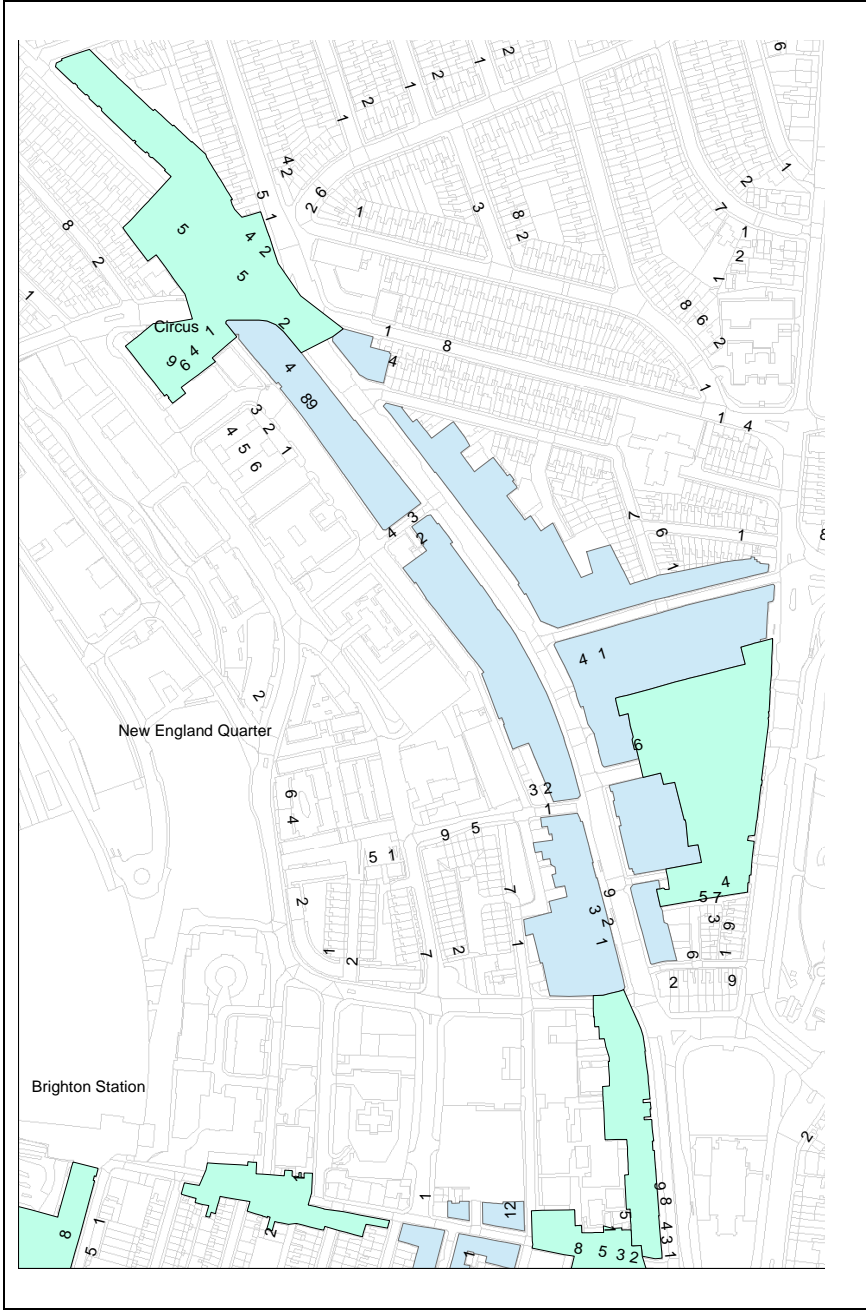
Deletions	Frontage change
<p>Secondary Frontage</p> <ul style="list-style-type: none"> - 65 & 65A Sackville Road (<i>estate agent and hairdressers but completely separate from rest of retail offer</i>) -1 to 63 Blatchington Road (<i>predominately dwellings</i>) 	<p>Primary to Secondary</p> <ul style="list-style-type: 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.

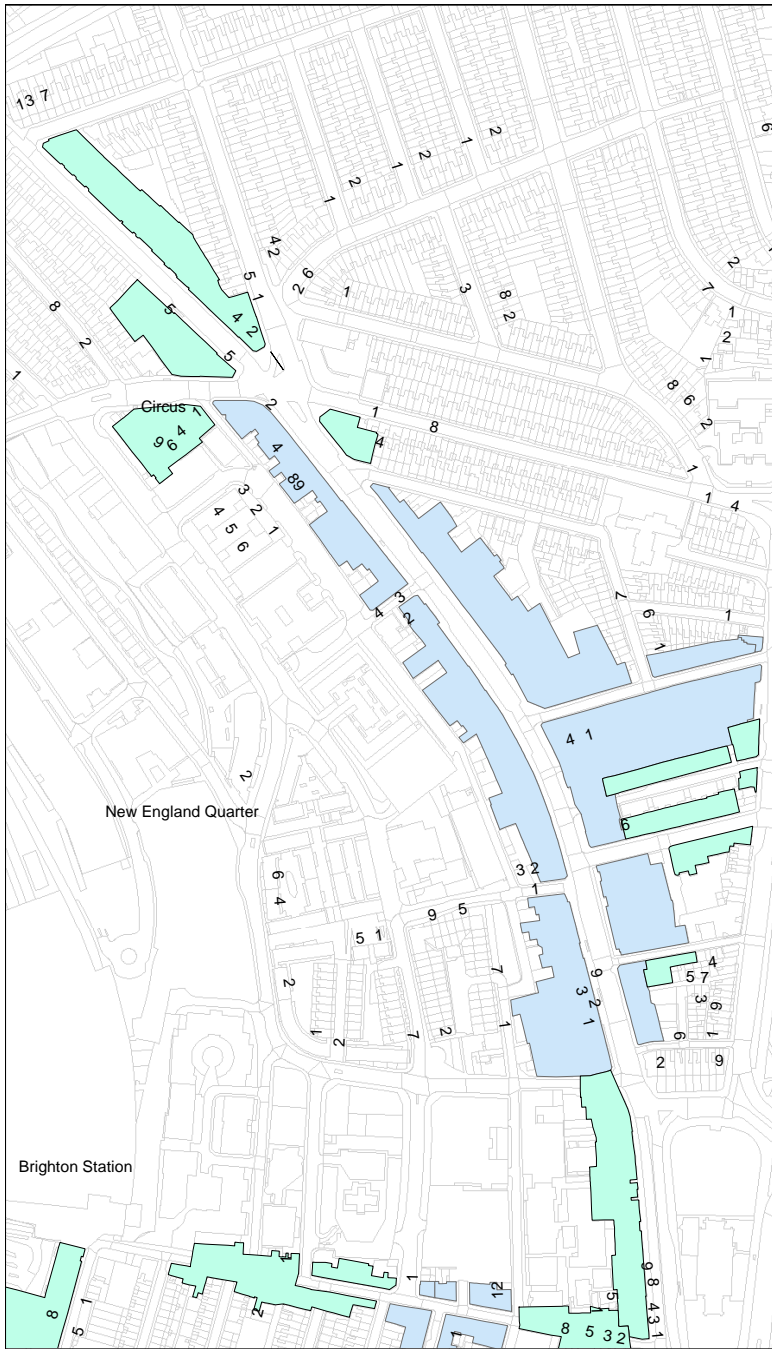
The latest 2018/19 healthcheck for Hove Town Centre shows that vacancy levels in the proposed new centre boundary are very low at just 4% maintaining a good mix of uses including a predominance of A1 retail in the primary frontage at 68%.

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

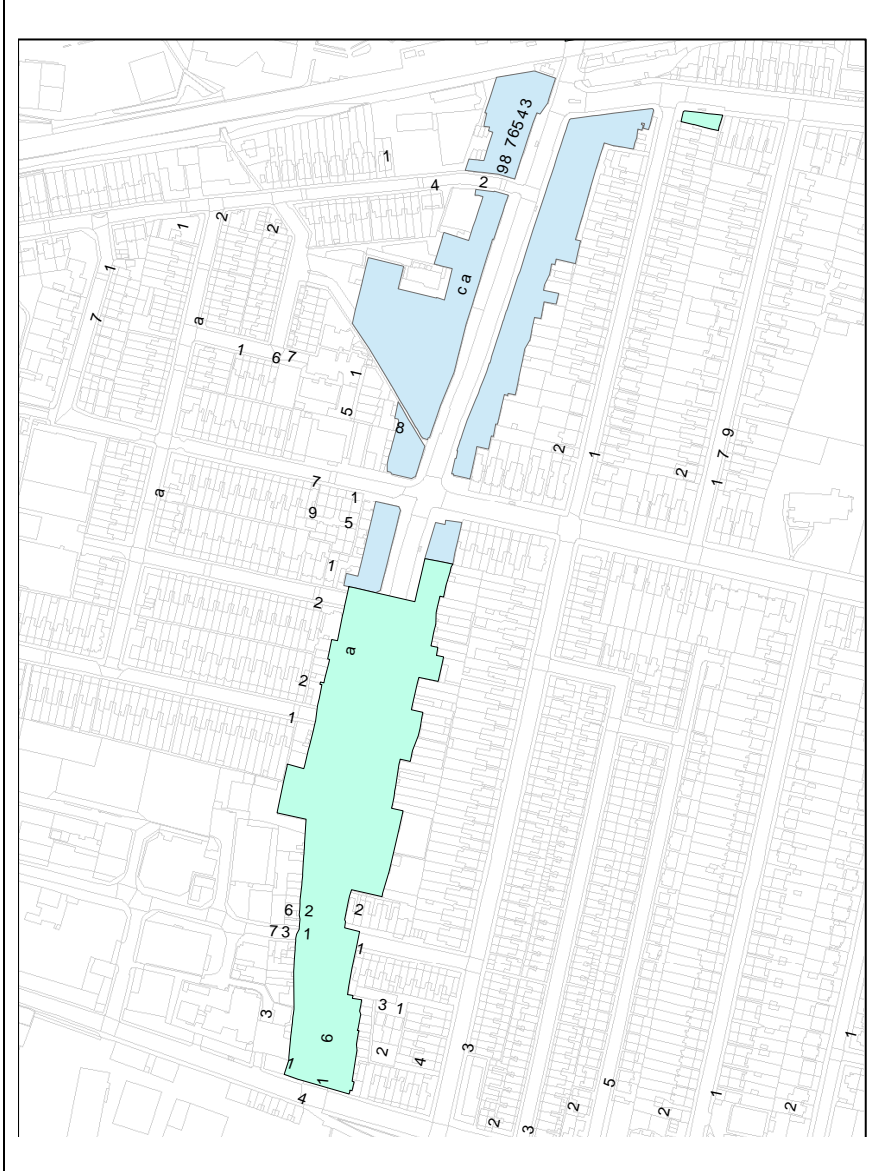
Summary: Residential units fronting Providence Place have been proposed to be removed in London Road Town Centre. Other sections of frontage proposed to be removed are from areas of the centre with decreased footfall and fragmented retail frontages such as Brunswick Row, Francis Street, Ditchling Road 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)**



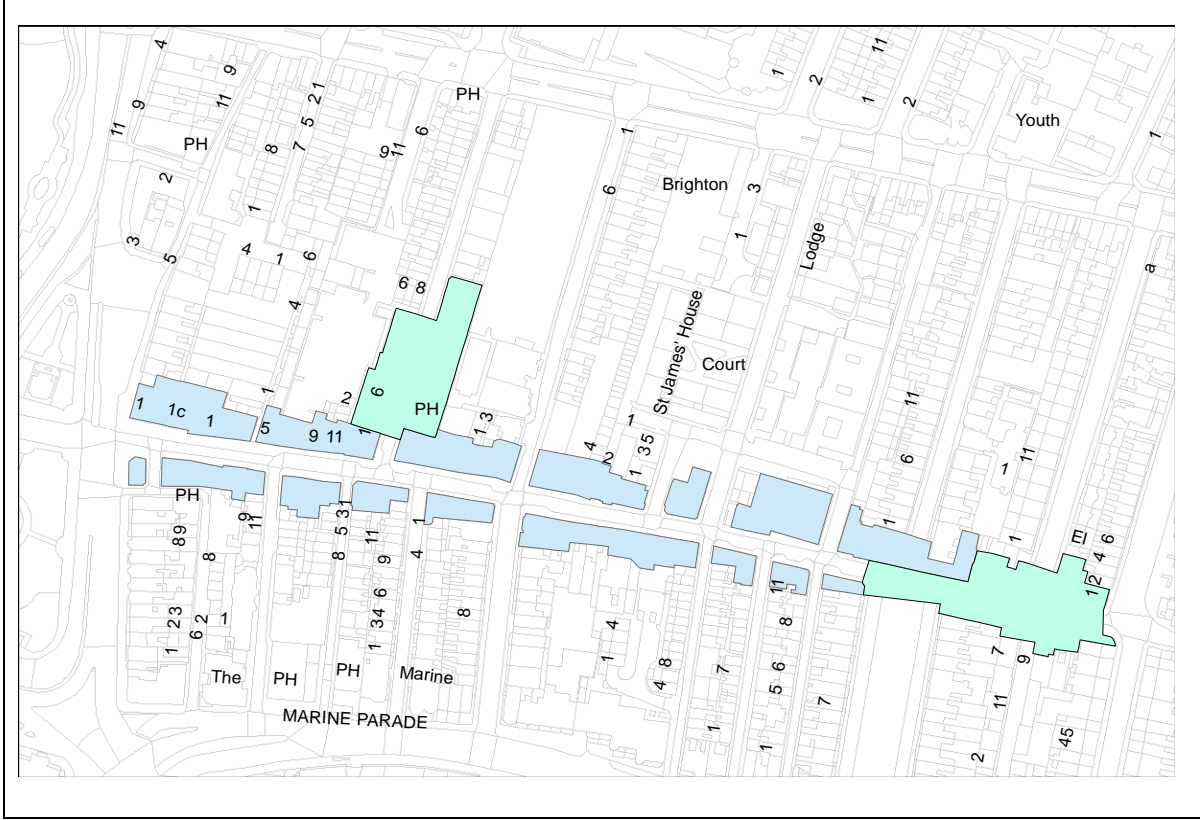
Proposed Changes Boundary Road /Station Road District Centre		
Deletions	Additions	Frontage change
<p>Primary Frontage</p> <ul style="list-style-type: none"> - Unit 3 Vale Road - Units to rear of 30 Station Road <i>(not in main shopping street)</i> <p>Secondary Frontage</p> <ul style="list-style-type: none"> - 3 to 19 Victoria Road <i>(mainly residential)</i> - 428 to 420 Portland 	<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
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>)		

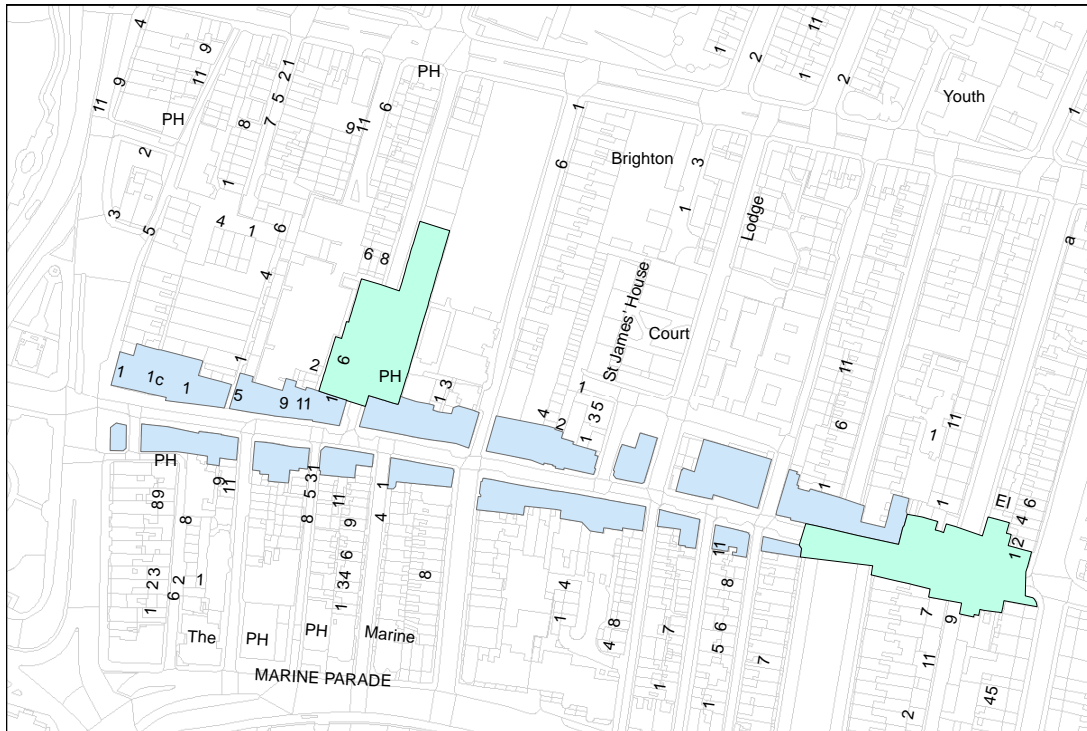
Summary: Stretches of residential units in the centre have been proposed to be removed from the current frontage of the District Centre, most notably units along Victoria Road and at the southern end of Boundary Road / Station Road. There have also been some redesignation of parts of frontages from primary 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

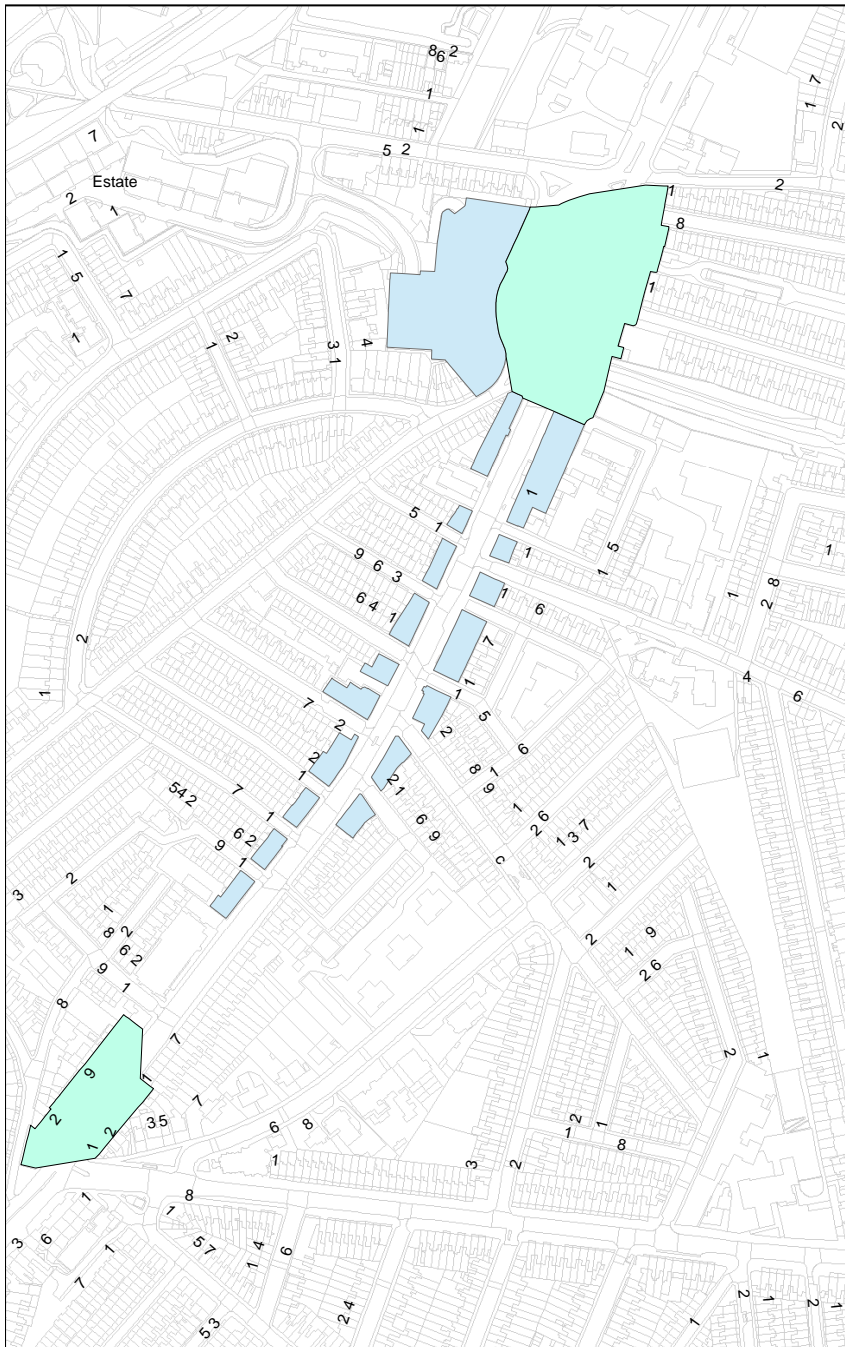
Secondary Frontage

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

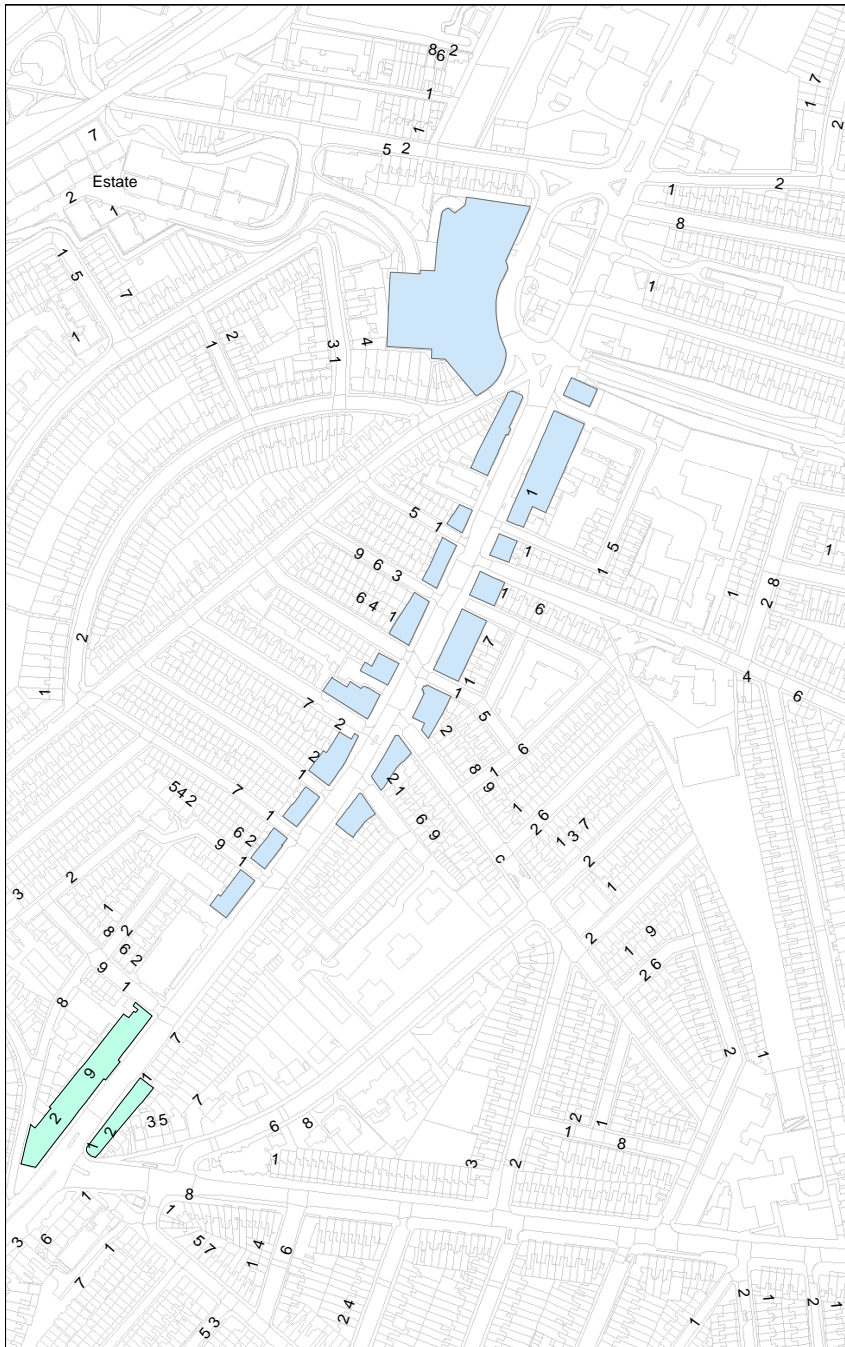
Summary: Small changes are proposed to the St James's Street District Centre to include two units in the secondary frontage of George Street. The 2018/19 health check of the centre shows a 55% predominance of A1 retail in the centre which peaks to 59% in the primary frontage. Overall the centre is faring 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 <p><i>(units felt to be peripheral to rest of centre interspersed with student accommodation)</i></p>		

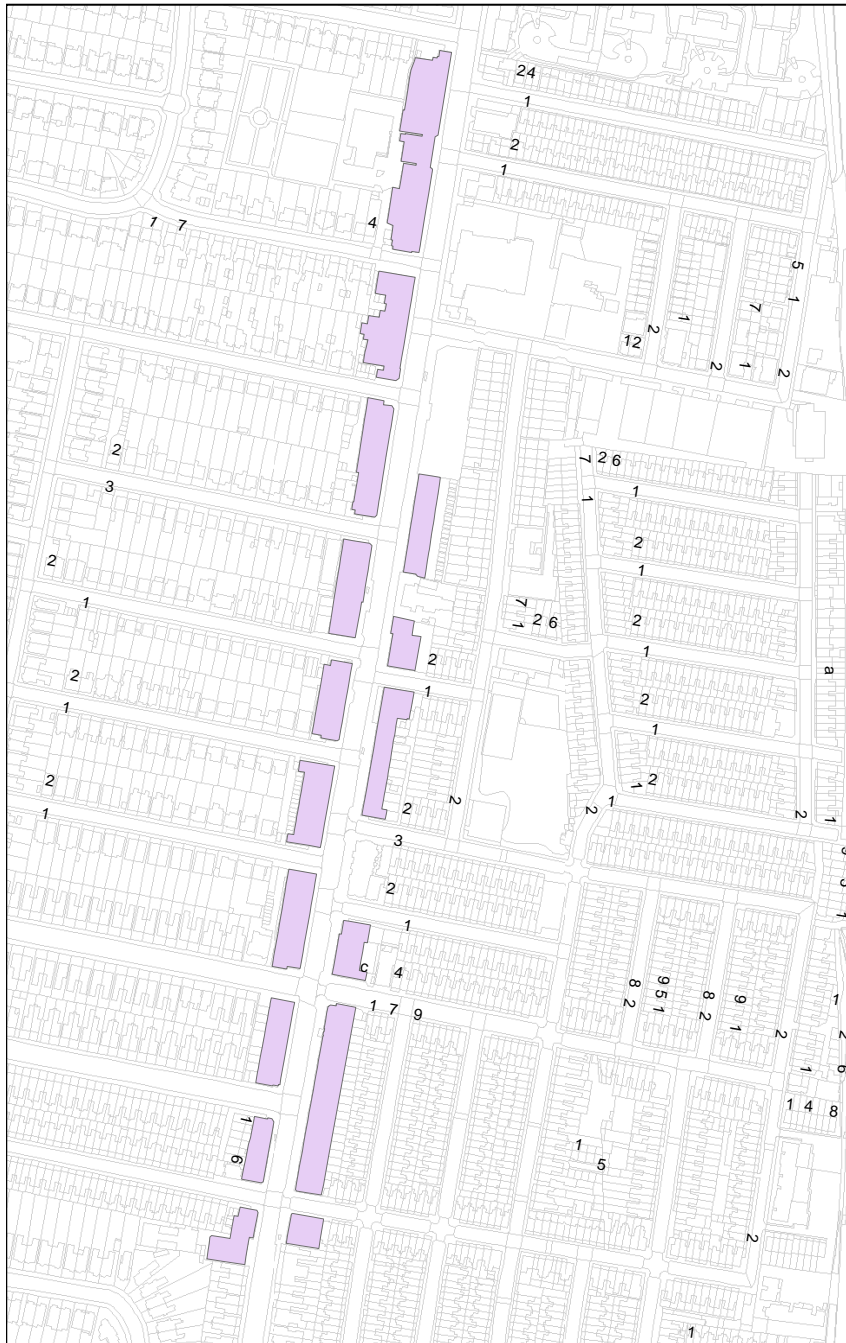
Summary: Units to the north of the Lewes Road District Centre are proposed to be removed due to their peripheral nature and lack of contiguous frontage. Overall the 2018/19 healthcheck shows that there are approximately 6% vacancies in the centre. The proportion of A1 retail in the primary frontage of the centre is currently at 49% so slightly less than the proposed policy requirement of 50%, however 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

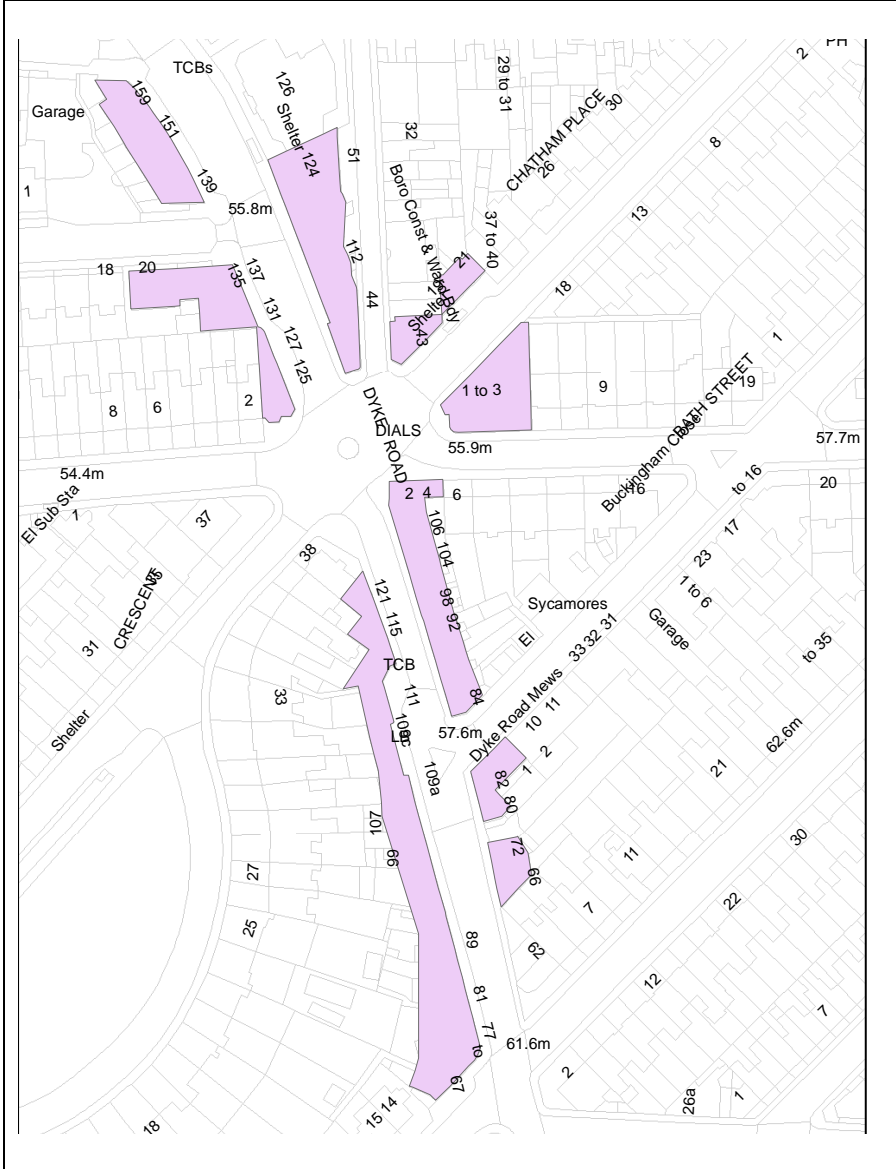
Additions

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

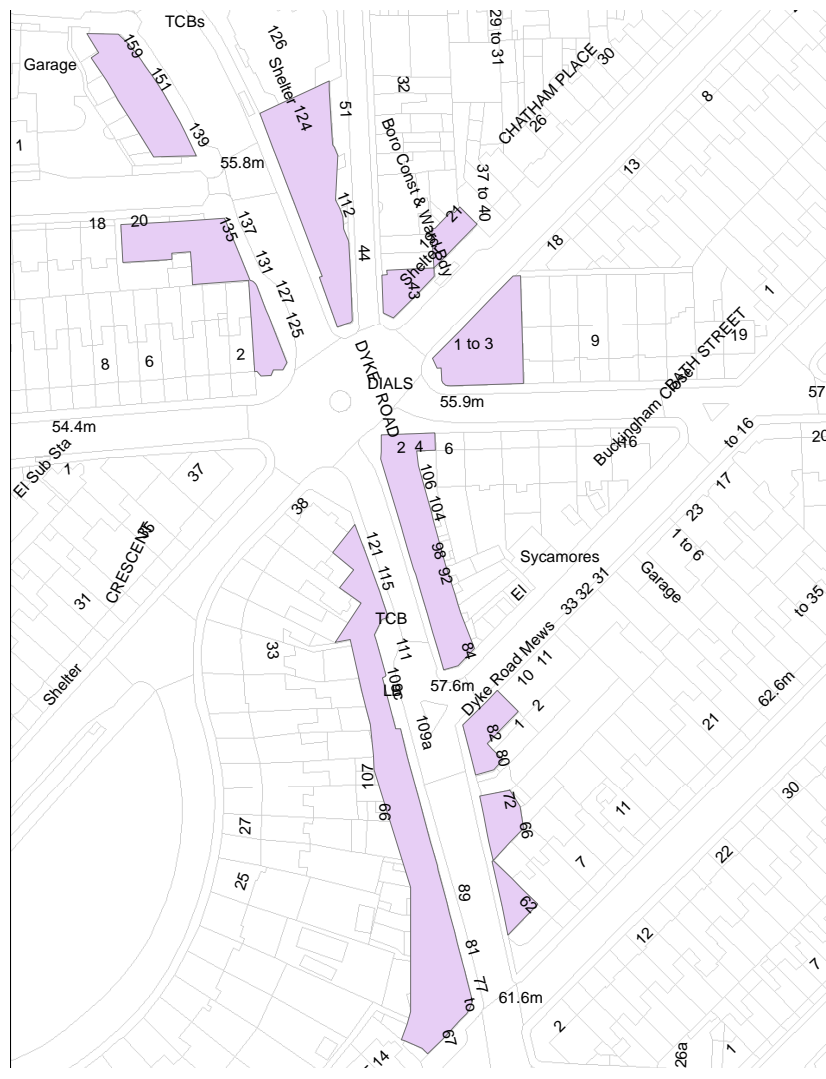
Summary: Additional units to the west of the centre have been included in the local centre as they offer good local services for the adjacent residential population. Overall the centre is faring well in terms of vacant units with just 4% in 2018/19. 62% of units in the proposed centre are within A1 retail 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
	<i>(previously excluded units from frontage but in active use, good footfall)</i>

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)*

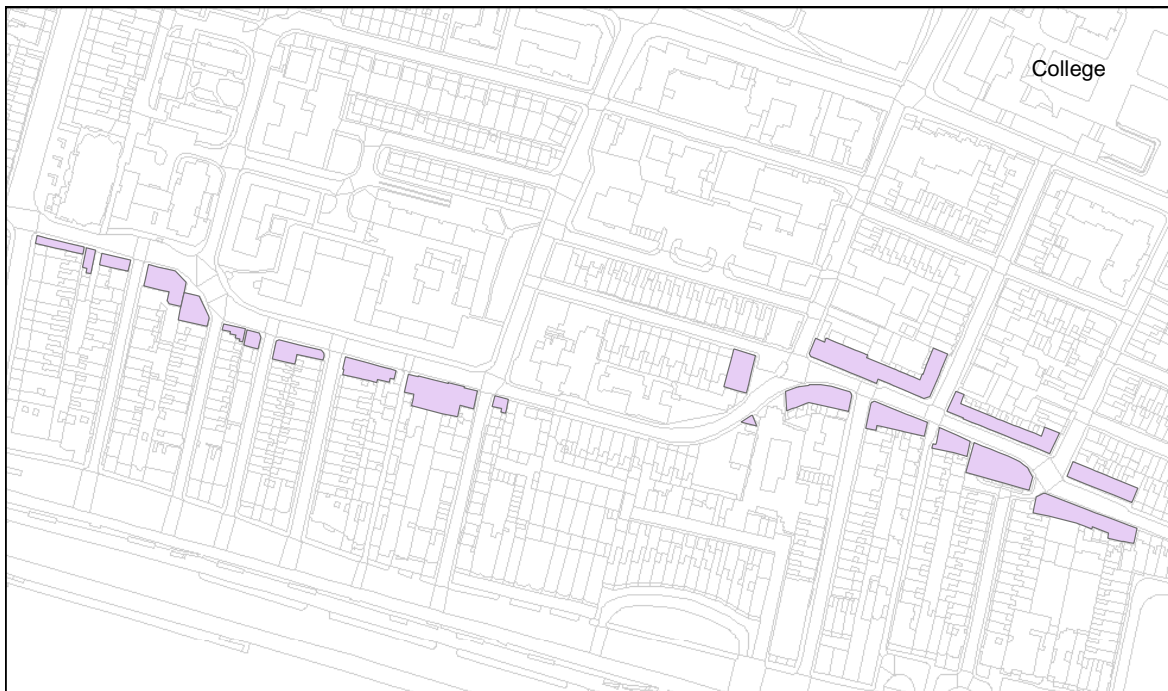
Summary: Additional units are proposed to be included in the centre along Ditchling Road. Overall this centre is very healthy in terms of A1 retail units reaching 65% and no vacancies.

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

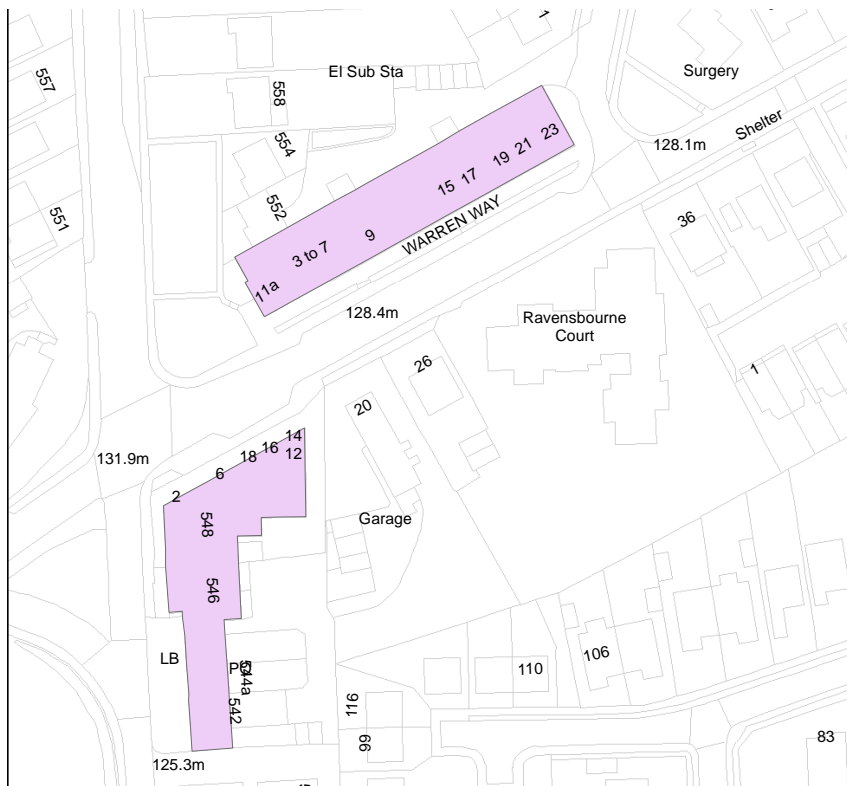
Additions

- 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

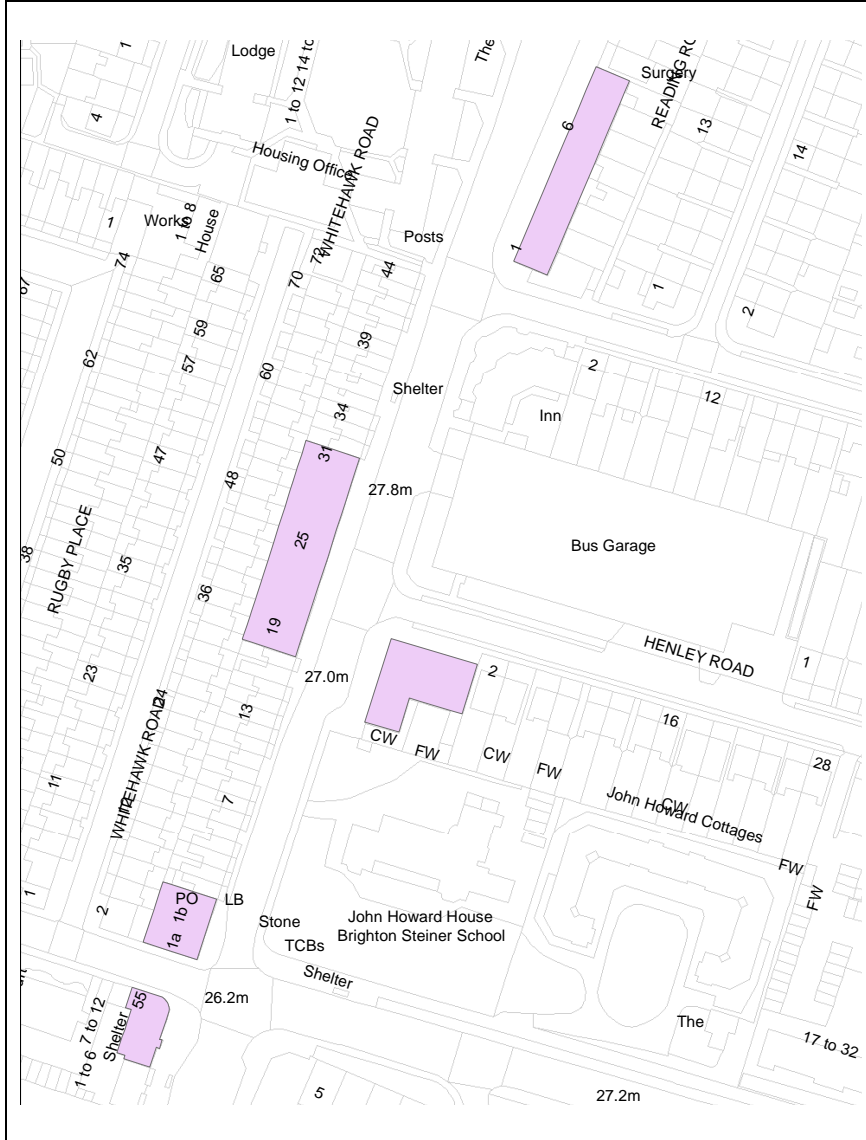
Deletions

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

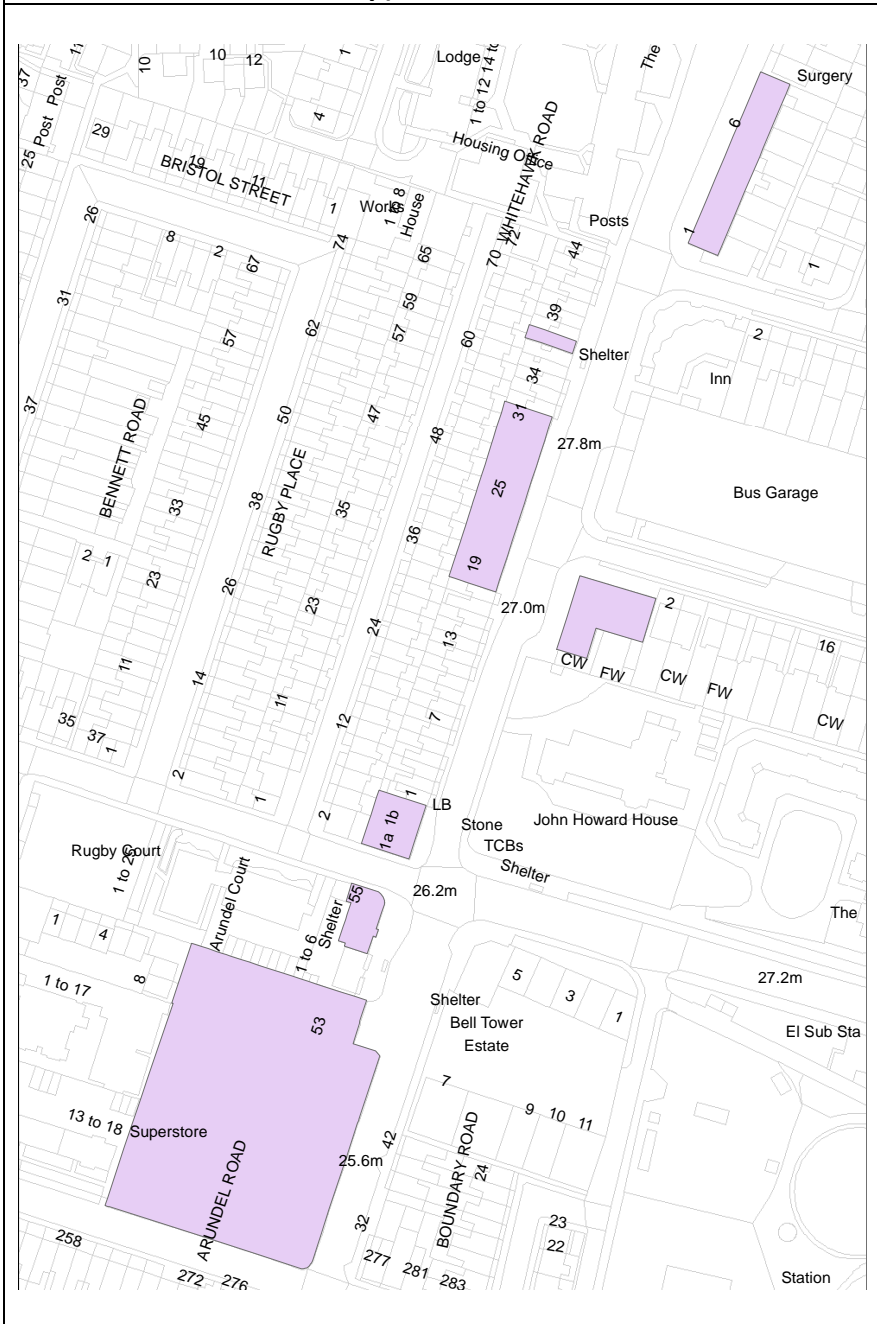
Summary: Residential units on Falmer Road are proposed to be deleted from the local centre which results in 47% of units being in A1 retail use and no vacancies. This slightly falls short of the required 50% of units in the CPP2 policy.

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



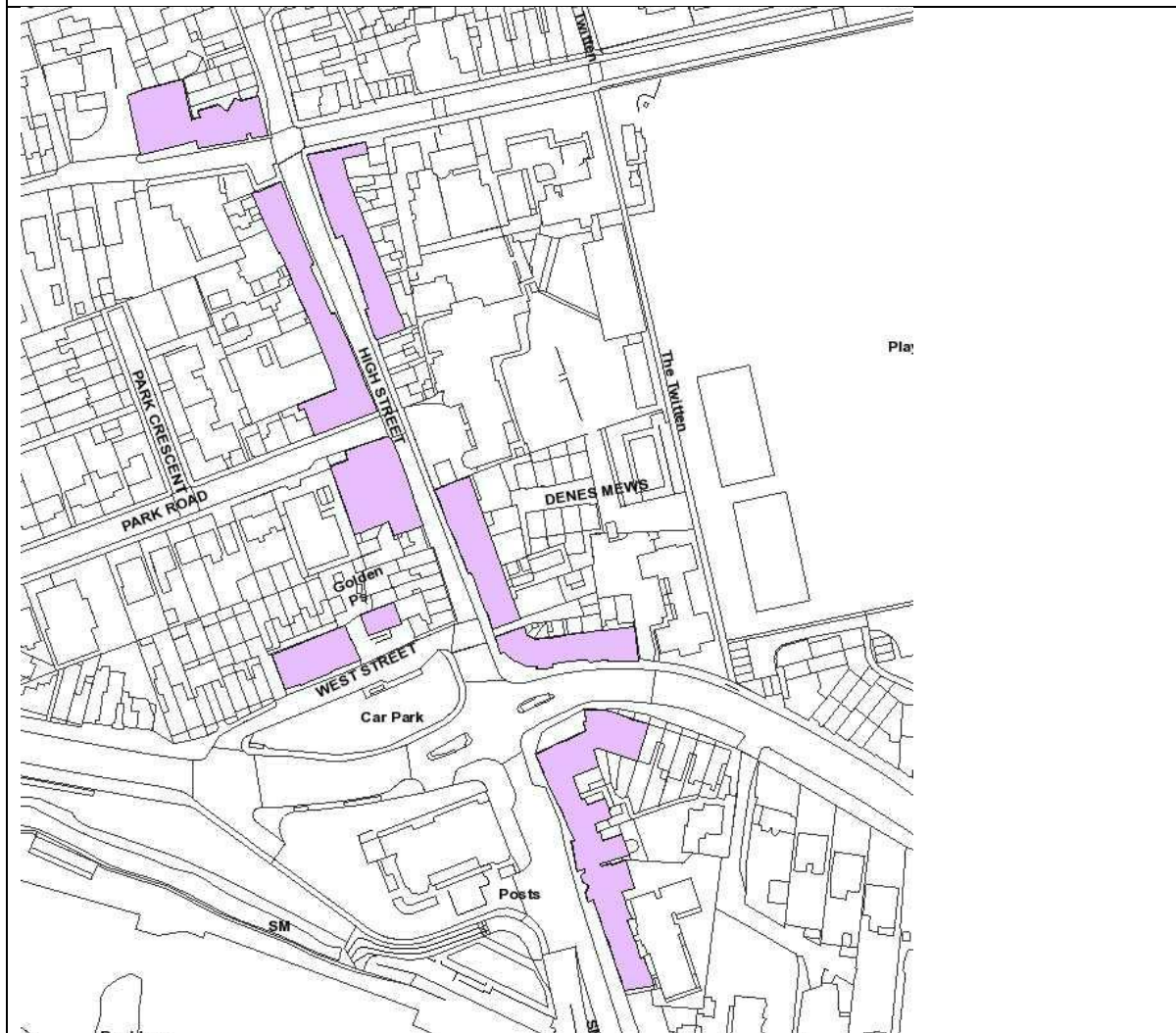
Proposed Changes Assessed and Agreed

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

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. 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.

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 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 Appendix 3 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;

Goldstone Villas, Hove



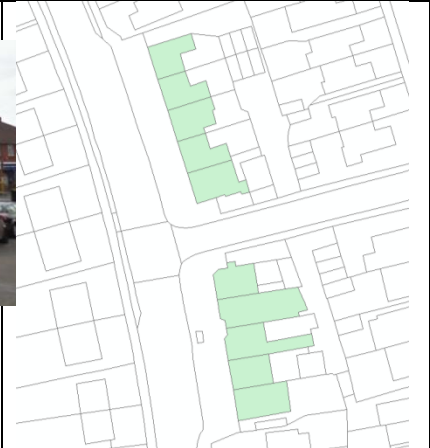
Hove Park Villas, Hove



Woodland Parade Hove



Valley Road, Portslade



Old Shoreham Road/Sackville Road, Hove



Victoria Terrace, Hove



Islingword Road, Brighton



Warren Road, Woodingdean



Cowley Drive, Woodingdean



Preston Drive, Preston Park



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

- 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	15/16 A1 % compliant with CPP2 threshold?	2017 % A1 compliant with CPP2 threshold?	2017 % A1 with proposed changes compliant with CPP2 threshold?	2018/19 % A1 with proposed changes compliant with CPP2 threshold?
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	15/16 A1 % compliant with CPP2 threshold?	2017 % A1 compliant with CPP2 threshold?	2017 % A1 with proposed changes compliant with CPP2 threshold?	2018/19 % A1 with proposed changes compliant with CPP2 threshold?
		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	15/16 A1 % compliant with CPP2 threshold?	2017 % A1 compliant with CPP2 threshold?	2017 % A1 with proposed changes compliant with CPP2 threshold?	2018/19 % A1 with proposed changes compliant with CPP2 threshold?
Boundary Road/Station 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%	
	Whole Centre	55%	54%	50%	N/A	N/A	N/A	N/A	N/A	

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	15/16 A1 % compliant with CPP2 threshold?	2017 % A1 compliant with CPP2 threshold?	2017 % A1 with proposed changes compliant with CPP2 threshold?	2018/19 % A1 with proposed changes compliant with CPP2 threshold?
		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%
	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%

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	15/16 A1 % compliant with CPP2 threshold?	2017 % A1 compliant with CPP2 threshold?	2017 % A1 with proposed changes compliant with CPP2 threshold?	2018/19 % A1 with proposed changes compliant with CPP2 threshold?
	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%
	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%

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	15/16 A1 % compliant with CPP2 threshold?	2017 % A1 compliant with CPP2 threshold?	2017 % A1 with proposed changes compliant with CPP2 threshold?	2018/19 % A1 with proposed changes compliant with CPP2 threshold?
	Fiveways	Whole Centre	64%	64%	65%	50%	Yes	Yes 64%	66%	65%
	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	15/16 A1 % compliant with CPP2 threshold?	2017 % A1 compliant with CPP2 threshold?	2017 % A1 with proposed changes compliant with CPP2 threshold?	2018/19 % A1 with proposed changes compliant with CPP2 threshold?
	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 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

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 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

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
						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 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	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

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
					DA6 area built as population of local area will change	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 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 day to day needs, overall 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
						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 to Boundary Road and 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
						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, overall retail offer considered poor. Close to Hove town centre.

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
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.
29. Warren Road Woodingdean	Yes 26	Yes	Yes	Yes	Yes – although could consider extending	Lots of units, variety of uses. Retail and services provide for 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
					existing Warren Way Local Centre designation to include these	
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
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

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
						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

