Ipswich Borough Council Local Plan

Topic Paper: Retail and Town Centre

Evidence on the scale of retail development for Ipswich Borough and the approach to retail and town centre policies

January 2015 (updated October 2015, Revision)

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Introduction

What the Council is doing

1. The Council is currently preparing a review of its adopted Core Strategy and Policies development plan document (December 2011) and a Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document. These documents form the Council's Local Plan, which guides future development in the Borough.

2. Proposed submission versions of the two plans were published for public consultation on 12th December 2014, under regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This followed on from an informal consultation (under regulation 18) which was undertaken between January and March 2014. Following representations received on the Proposed Submission plans and changes in national policy, in October 2015 Pre-Submission Main Modifications were published for consultation.

3. The Core Strategy and Policies development plan document review (hereinafter referred to as the Core Strategy review) will replace the adopted Core Strategy and Policies development plan document when adopted (anticipated in mid-2016).

4. The Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document (DPD) (hereinafter referred to as the Site Allocations Plan) is a new plan. It will replace the remaining saved policies of the adopted Ipswich Local Plan (November 1997) when adopted (anticipated in mid-2016).

5. The Council is undertaking a public consultation on Pre-Submission Main Modifications to the Core Strategy review and the Site Allocations Plan and their supporting sustainability appraisal and appropriate assessment reports with addenda. The consultation period will run from Friday 9th October 2015 to Monday 23rd November 2015 and further details can be found on the Council's website, www.ipswich.gov.uk/consultations, at the Council's offices at Grafton House and the Customer Services Centre at the Town Hall, or in Ipswich libraries.

National Planning Policy Framework – Plan Making

6. The National Planning Policy Framework (NPPF) was introduced in March 2012 following the introduction of the Localism Act in November 2011. The NPPF is national planning policy and Local Plan documents such as the Core Strategy must refer to the principles established in the document.

7. The NPPF notes in paragraph 182 that the Local Plan will be assessed at the Examination in Public whether it has been prepared in accordance with the Duty to Co-operate, legal and procedural requirements, and whether it is sound.

8. The Duty to Co-operate was introduced through Section 110 of the Localism Act 2011 in November 2011. It is a legal duty on local planning authorities to co-operate constructively, actively and on an ongoing basis with neighbouring authorities, county councils and other prescribed bodies in planning for strategic, cross boundary matters. The duty to co-operate came into force on 15th November 2011 and any plan submitted for examination on or after this date will be examined for compliance. Local planning authorities are expected to provide evidence of how they have complied with any requirements arising from the duty. Non-compliance with the duty to co-operate cannot be rectified after the submission of a plan.

9. The Inspector will first check that the plans meets the legal requirements under s20(5)(a) of the Act before moving on to test for soundness. Legal requirements include e.g. whether it is included in the Council's Local Development Scheme; whether the Council's Statement of Community Involvement has been followed; and whether documents have been published and made available for public inspection.

10. To be sound the plan must be:

    - **'Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

    - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

    - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

    - **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.' (Para 182)

11. Paragraph 15 of the NPPF notes 'a presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay' and plans include 'clear policies that will guide how the presumption should be applied locally' (p.4).

National Policy Context

12. Paragraphs 23 to 27 of the National Planning Policy Framework[1] (NPPF) set the overarching strategy for planning for retail and town centres. The NPPF requires planning policies to promote the role of the town centre as the heart of communities through focusing retail, leisure, commercial, office, tourism, cultural, community and residential development in town centres. It requires that needs for these uses are met in full. These needs should be provided for within the town centre, or where this is not possible in edge of centre sites that are well connected to the town centre, and where this is also not possible in other accessible locations that are well connected to the town centre.

13. In terms of other centres the NPPF requires planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes.

14. In respect of the focus on the town centre, the NPPF requires planning authorities to apply the sequential test to town centre uses proposed outside of the centre. The centre is preferable, followed by edge of centre[2], and finally out of centre. Where town centre uses are proposed outside of a town centre a sequential test is required to

[1] National Planning Policy Framework (Department of Communities and Local Government, 2012)

[2] Edge of Centre is defined in the NPPF as 'For retail purposes, a location that is well connected and up to 300 metres of a primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.'

demonstrate that there are no town centre, or failing that edge of centre, locations which would be suitable and deliverable, and should this be passed an impact assessment for developments over 2,500sqm gross[3] (or a locally defined threshold) is also required to ascertain the effect on existing, committed or planned investment within centres and on town centre vitality and viability. Where an application fails the sequential test, or the impact assessment shows it would have a significant adverse impact, it should be refused.

15. In relation to town centres, the NPPF has a set of specific aims for planning authorities in relation to town centres, stating that they should:

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;

- define a network and hierarchy of centres that is resilient to anticipated future economic changes;

- define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations;

- promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;

- retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;

- allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites;

- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;

- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;

- recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and

- where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.

[3] The NPPF does not itself specify gross or net, however gross is specified in the accompanying national Planning Practice Guidance.

16. Guidance on implementing the NPPF policy on retail and town centres is contained in the national Planning Practice Guidance[4], as referenced where relevant throughout this Topic Paper.

Use Classes Order

17. The retail and town centre policies in the adopted and proposed plans refer in many places to uses as defined by the Use Classes Order (see Appendix 1). This is established through the Town and Country Planning (Use Classes) Order 1987 and subsequent amendments. Further information is available via the Planning Portal at http://www.planningportal.gov.uk/permission/commonprojects/changeofuse/.

18. In 2013 the Government introduced an amendment to the Use Classes Order to allow change of use from retail to offices, plus a range of other uses[5] for a temporary period of up to two years[6]. In 2014 further amendments were made[7] to allow change of use from a small shop (up to150sqm gross[8] of retail space) or provider of professional/financial services (A1 and A2 uses) to residential use (C3).

19. Further amendments to the Use Classes Order were made during 2015. In relation to retail and town centre uses these allow change of use from A1 and A2 uses to A3 use provided this would not exceed 150sqm floorspace, reclassification of betting shops and pay day loan shops as sui generis uses (formerly A2) meaning that permission is required for any change of use to or from these uses and would allow change of use of an amusement arcade or casino to a dwellinghouse (C3),

Retail and Town Centre Studies

20. The following studies have informed and provide evidence in relation to the Council's current and proposed retail planning policies. These are discussed and referred to later in this Topic Paper in relation to specific elements of policy.

Ipswich Borough Council Retail Study 2005 (DTZ Pieda Consulting, 2005)

21. The purpose of this study was to define the catchment area of Ipswich for comparison and convenience retailing acknowledging its wider regional influence, provide an assessment of the existing health of Ipswich Town Centre and the Borough's other centres to ascertain their relative performance and attractions as shopping locations, provide an indication of the likely future capacity and market demand for new retail floorspace across the Borough as a whole to 2021, assess the options for future additional retail development by providing planning and market advice on identified key development opportunity sites within the main centres, review the boundaries of primary, secondary and speciality shopping frontage designations and the town centre and central parking core and review other key areas where retail proposals are evolving.

[4] See http://planningguidance.planningportal.gov.uk/
[5] The 2013 amendment allows change of use from A1, A2, A3, A4, A5, B1, D1 and D2 uses to A1, A2, A3 and B1 uses (see Appendix 1 for definitions) for a single period of up two years without planning permission.
[6] The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013
[7] The Town and Country Planning (General Permitted Development) (Amendment and Consequential Provisions) (England) Order 2014
[8] Defined in the Order as amount of 'floor space in the building having changed use'.

Retail and Commercial Leisure Study (Strategic Perspectives, October 2010)

22. The purpose of this study was to assess the quantitative and qualitative need for new retail and commercial leisure uses and floorspace, determine current shopping patterns for convenience and comparison goods and for main commercial leisure uses, carry out a health check of Ipswich town centre, advise on the network and hierarchy of centres including any deficiencies and undertake a broad review of the role and function of district and local centres and the retail/leisure uses in the waterfront area. This study represented an updating of the 2005 Study.

Appraisal of Ipswich Town Centre Opportunity Areas Study (DTZ, 2013)

23. This considered the national and local markets in terms of retail and leisure and undertook a review of retail and leisure provision and trends in the town centre to identify strengths, weaknesses, opportunities and threats. It analysed the availability, viability, suitability and deliverability of sites/premises within each of the five opportunity areas (Tower Ramparts, Westgate, Cox Lane, Merchants Quarter and Waterfront) and recommended strategies / future uses for each of these.

Northern Fringe, Ipswich – Assessment of Retail Requirements (NLP, 2013)

24. This considers the retail requirements related specifically to the development of the Ipswich Garden Suburb.

Retail Surveys

25. The Council publishes annually a Central Shopping Area – Identified Frontages Survey and a District and Local Centre Survey. The Council resumed publication of its annual Retail Park survey from 2014 onwards. These surveys identify units that are currently vacant within each town centre frontage, centre or retail park and provide brief conclusions on the current situation.

26. Each of the above documents is available to view via the Council's website www.ipswich.gov.uk.

Future capacity / needs

27. The 2010 study identifies a need for 3,580 – 7,161sqm net of convenience floorspace and 47,498sqm net of comparison goods by 2026 across the Borough as shown in Table 1 below. Capacity to 2031 is also identified, however policy CS14 states that provision after 2026 will be addressed following a future review of the capacity study. This reflects the degree of caution that should be placed on the figures noting that the 2010 Study states 'the floorspace capacity forecasts identified by this study should be treated as a broad indication of the potential need for new retail floorspace, rather than a maximum or minimum threshold (or target) that should necessarily be met. Forecasts more than five years ahead are inherently less certain and should therefore be treated with caution and regularly updated.' Specifically, the 2010 study advises that there is a need for a foodstore in the town centre which would 'result in significant positive benefits to the centre's overall vitality and viability through linked trips and spin-off expenditure.'

28. The capacity figures assumed that the Tesco Extra scheme on Grafton Way, the retail warehouse on the Cinram site at Ransomes Euro Park and the Westgate scheme would come forward. The planning permission for the Tesco Extra development expired in February 2015 and the site is now proposed for allocation for housing, public open space, office leisure and hotel development. The development on the Cinram site has

not taken place and is protected as employment land. The Westgate development has not taken place and an extended site is now proposed for allocation for retail development under policy SP10 of the Site Allocations DPD. Other developments permitted since the 2010 Study include the development of convenience and comparison units at Futura Park, which have been delivered, and mixed use planning permission including retail at the Cliff Brewery site. The development of the Cliff Brewery site has not yet come forward. In addition, a number of smaller convenience stores have opened in or close to the Central Shopping Area as set out above including a Morrisons Local, Iceland, Tesco Express and Little Waitrose. The figures will be updated through a review of the study in due course. Potential capacity as identified in the 2010 study is shown in Table 1 below.

Year	Comparison Goods	Convenience Goods	Commercial Leisure
	Floor space potential capacity (sq m) net	**Floor space potential capacity (sq m) net**	**Floor space (sq m) potential capacity (A3/A4/A5 uses only) net**
	Borough Wide	Borough Wide	Ipswich only
2016	13,320	-	2,660-4,000
2021	29,386	764-1,528	5,880-8,820
2026	47,498	3,580-7,161	9,500-14,250
2031	71,458	7,751-15,502	14,290-21,440

Table 1: Potential retail capacity (Source: Retail and Commercial Leisure Study, 2010)

29. The adopted Core Strategy DPD proposed at least 35,000sqm net of additional retail floorspace (adopted policy CS14). This was based on the conclusions of the 2005 Retail Study and an Interim Draft of the 2010 Study and was considered to be consistent with the subsequently published final 2010 Study. Whilst being lower than the potential capacity identified to 2026 (the adopted Core Strategy covers the period to 2027) 35,000sqm net would allow a total of 30,000sqm net to come forward at the Mint Quarter and Westgate Quarter, along with a further 5,000sqm net to allow flexibility for other retail floorspace to come forward in the Central Shopping Area. This was based on provision of 10,000sqm net at Westgate and 20,000sqm net at the Mint Quarter, broadly reflective of planning applications relating to these sites. Outline planning permission was granted for around 18,500sqm net retail floorspace at the Mint Quarter in 1993 but not implemented and there was a resolution to grant planning permission for around 10,000sqm net retail floorspace at Westgate in 2008 although permission has never been granted as the Section 106 agreement was never signed.

30. Whilst the 2005 and 2010 Studies suggested a larger capacity gap to 2026 than the 35,000 planned for it was considered that allocating higher provision could have created pressure for the release of out of town centre sites first. In addition, as stated above the 2010 Study states that the capacity figures should be treated with caution, particularly forecasts for over five years ahead.

31. Proposed policy CS14 as set out in the Core Strategy DPD Review looks to revise the 35,000sqm net within the context of more recent evidence. The need to minimise any pressure for out of town development and to treat the figures with caution remains. The 2013 DTZ Report provides a more recent analysis of retail and town centre development opportunities and suggests that initially development should be focused on the existing prime and well-functioning areas and should recognise the difficulties of delivering multiple schemes in one development cycle. Such an approach would be both the most viable and will also help to prevent weakening of the more strongly performing areas. For this reason, it is proposed that the focus should be on delivering the Westgate site and therefore the amount of retail floorpsace proposed has been scaled back to in the

region of 15,000sqm net. The Sustainability Appraisal considered, as an alternative, retaining the approach in the adopted policy CS14. However this identified potential negative effects on the economy through an oversupply of retail units whilst in all other respects the two options performed similarly.

32. Whilst 15,000sqm net is greater than that proposed for Westgate in 2008, this reflects the allocation of Westgate as the only site allocated for large scale retail development. Proportions of convenience and comparison at Westgate are not specified to enable flexibility in delivery. Retail provision within other allocations will also contribute towards addressing the potential capacity. Policy CS14 commits to reviewing this situation through a review of retail capacity to ascertain whether further provision is likely to be required beyond 2026.

Ipswich Town Centre

Current situation and recent trends

33. Nationally, the 2013 DTZ Study reports that the UK and global recession has had a significant impact on consumer, business, investor and developer confidence which has been further eroded by the Euro zone crisis and the UK's slow recovery from recession. Recently, investment is focusing more on prime property and locations whilst the secondary sector continues to decline. Retailers are looking to globalise and the sector is polarising into the 'premium' and 'value' sectors which have continued to perform well. The growth in online retail is also continuing and it is estimated that 25% of all UK retail sales will be online by 2020[9]. Central London, regional city centres and regional shopping malls remain 'relatively safe' against pressure from online shopping however the DTZ study suggests that small and medium sized towns will need to implement innovative ideas in order to maintain and enhance their roles. In terms of office space, there is generally an undersupply of grade A assets, along with an over-supply of secondary offices for which there is little demand.

34. Ipswich is identified as a secondary town within the 2013 Study, based upon its current characteristics particularly in terms of its retail and office space offer. Different parts of the town centre serve different functions in terms of retail and town centre uses, as identified on the IP-One Area Inset Map accompanying the Site Allocations DPD. The Central Shopping Area (CSA) relates to those streets where retail is the primary use, and within this is the Primary Shopping Area (PSA), Secondary Shopping Area (SSA) and Speciality Shopping Area (SpSA), reflecting their roles and retail offer provided within them. The SpSA performs an important role in linking the PSA and SSAs with the Waterfront.

35. The town centre is drawn more widely that the CSA and forms the focus for non-retail main town centre uses such as leisure and offices. The defined town centre overlaps the Ipswich Village area and the area which falls within both is the focus for much of the large scale office floorspace provision within the town centre.

36. The 2013 Study states that in 2013 Ipswich was ranked as 58th in the national hierarchy of shopping centres (as ranked in Venuescore), below Norwich (13th) and Cambridge (34th) suggesting a challenge in terms of competing with other centres in the region. However, it is identified that 80% of comparison goods shopping trips are retained in Ipswich.

[9] BCSC Retail Shopping Report 2012 as quoted in the 2013 DTZ Study

37. In terms of footfall (i.e. number of pedestrians), in the 2010 Study this was noted as being strongest on Tavern Street, Westgate Street and Carr Street. The 2013 Ipswich Pedestrian Counts[10] report would suggest a similar pattern although footfall at the eastern end of Carr Street is relatively low. This may be due to the closure of the Vergo department store (formerly the Co-op) in 2011.

38. Both the 2010 and 2013 studies identified that provision of comparison offer in the town centre is roughly on par with national averages whilst the convenience offer is below the national average. In 2010 convenience provision represented 5% of floorspace in Ipswich compared to 14.4% nationally. However it should be noted that since this time a second Iceland store (in Tower Ramparts Shopping Centre), a Little Waitrose and a Morrisons Local have opened in the town centre. A Tesco Express has also opened just outside of the town centre on St Matthews Street. Despite the comparison offer being broadly as average overall, it is noted that there is a gap in the town's department store offer and this situation is likely to have worsened since the closure of Vergo (formerly Co-op) on Carr Street.

39. In relation to leisure uses, the 2010 study noted that these made up 18.4% of outlets in the town centre, compared to an average of 21.7% nationally. The town centre has a particularly strong presence of building societies, employment and careers, printing and copying and property services. Retail services (such as opticians, health and beauty salons and travel agents) represent 12% of outlets, slightly below the national average, although the study identified that these had been increasing. The 2015 Central Shopping Area – Identified Frontages report would suggest this pattern of provision broadly remains.

40. The 2015 Central Shopping Area – Identified Frontages report shows that the number of vacant units at 16.4% is an increase on recent years and is higher than the national figure of 10.4%[11]. However it should be noted that a significant proportion of this percentage relates to vacant units in the Tower Ramparts and Buttermarket shopping centres. Planning permission was granted in October 2014 for alterations to the Tower Ramparts shopping centre as part of a programme of refurbishment and re-branding,and therefore a number of units remain vacant whilst works are underway. Planning permission was granted in June 2015 for change of use of parts of the Buttermarket shopping centre to provide a cinema, gym and greater proportion of A3 (restaurant and café) uses, and therefore a number of units are presently vacant.[12]

41. Nevertheless excluding Tower Ramparts and the Buttermarket from the calculations, within the Primary Shopping Area 15.5% of units are vacant, with 10% of units in the Secondary Shopping Area and 16% of units in the Specialist Shopping Area being vacant. This suggests that the conclusions of the 2010 study in terms of resisting out of town retail uses remain relevant (see relevant section below). Upper Orwell Street in the eastern part of the Town Centre and defined as a Speciality Shopping Area also contains a high proportion of vacant units, however the Site Allocations DPD identifies this area for predominantly non-retail uses including residential.

42. In terms of office space in the town centre the 2013 study concludes there is a surplus of secondary office stock but almost no grade A stock, and considered that developers are unlikely to embark upon speculative developments. However, planning permission was granted in August 2015 for the development of 4,671sqm (internal floorspace) of B1

[10] Ipswich Pedestrian Counts for Ipswich Borough Council (NEMS Market Research, August 2013)

[11] See http://www.spring-board.info/uk/reports/JAN2015-VACANCY-SURVEY-RESULTS. Note that the two surveys should not be directly compared due to the differences in methodology.

[12] [12] Please note the vacancy figures in this paragraph correct a previous version of this Topic Paper

office space on Princes Street and works are also progressing on the renovation of the former Fisons office building on the corner of Princes Street and Grafton Way. Further information on employment development is contained in the Employment Topic Paper.

43. Particular weaknesses in the town centre are identified as a lack of high end retailers, weak connections to the waterfront, relatively high vacancy rates and size of units not suitable to modern needs. The main conclusions of the 2013 DTZ Study in this respect are that, as a secondary town:
    - there is a risk from the effects of the national trend of retailers downsizing;
    - there is an increasing importance in the provision of leisure and A3 (restaurants and cafes) uses as 'anchors'. The study identifies that these sectors are currently under-represented within Ipswich;
    - there is a need to provide a high quality shopping experience and to actively manage the town centre;
    - there are good bus links, although a lack of a central public transport hub and a need for improved parking;
    - availability of developer finance, particularly financing for speculative office development, is an issue.

<u>Mix of uses in the Central Shopping Area</u>

44. In reflection of the increasing importance of leisure and A3 uses within town centres, policies CS14 and DM20 have been amended to allow a wider range of uses to come forward within the Secondary Shopping Area (SSA) and Specialist Shopping Area (SpSA) of the Central Shopping Area and at the Waterfront. The approach in the revised policies reflects the approach within the NPPF to 'retail' and 'main town centre uses', as well as the conclusions of the 2013 DTZ study. Main town centre uses are defined in the NPPF as 'retail development (including warehouse clubs and factory outlets); leisure, entertainment facilities, the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).' The category of 'main town centre uses' therefore includes some B1, D2 and Sui Generis uses and classes A3 (restaurants and cafes) and A4 (drinking establishments) are no longer classed as retail as they are quoted separately within the definition of main town centre uses. It is considered that in addition to A1 uses, A2 and A5 uses are by implication included within the NPPF definition as 'retail'.

45. Permitting non-retail main town centre uses in the Central Shopping Area represents a change to the policy in the adopted Core Strategy which will enable a greater diversity of uses to be provided in the central area, reflecting the conclusions of the 2013 DTZ Study as well as the policy contained in the NPPF, whilst still maintaining a predominantly retail function. Under policy DM20 a higher proportion of non-retail main town centres uses are allowed in the SpSA as this is a sequentially less preferable location for retail uses. Consideration was given to removing the SpSA designation, however it is considered that this area performs an important link between the core of the town centre and the waterfront and this importance may increase with further development at the Waterfront.

46. Policy DM20 has been updated to reflect the fact that within the Council's 1997 Central Shopping Area - Identified Frontages Supplementary Planning Guidance[13] and in the Council's annual retail surveys the first floors of the Buttermarket and Tower Ramparts Shopping Centres are classed as frontages as they perform the same function as ground floor frontage across the rest of the Primary Shopping Area.

47. Recent developments in or close to the town centre that go towards achieving and supporting this diversity of uses include the Travelodge on Duke Street and the Premier Inn on College Street, and the 2015 Central Shopping Area – Identified Frontages Survey shows that especially in the SpSA a number of non-retail main town centre uses have opened up in previously vacant premises.

<u>Opportunity Areas</u>

48. The 2013 DTZ Study also considers possibilities in relation to a number of opportunity areas. This has informed the policy approach for the opportunity areas as presented in the Site Allocations DPD. The 2013 DTZ Study identifies particular opportunities for enhancing the town centre. This analyses the national market and concludes that small and medium sized towns need innovative ideas to maintain spend, and that in terms of investment there is growing uncertainty over the sustainability of secondary towns. Ipswich is classed as a secondary town. Nationally, there is an increasing focus on the provision of leisure uses within town centres. The identification of specific approaches for the Opportunity Areas therefore represents the Council's strategy to guide and support the future success of the town centre.

49. The 2013 Study identified Westgate as the most suitable site for a retail led scheme, due to its location in relation to existing anchor stores in the more westerly part of the town centre, although linkages with the Primary Shopping Area would need to be enhanced. The Study states that the site is most likely to be suitable for a foodstore, particularly should other sites not be delivered. As the planning permission for a Tesco store on Grafton Way has now lapsed, this would further strengthen the prospects for a foodstore in this location. The Study identified an element of residential could also form part of the development of the area. These recommendations have been taken forward in policy SP10. The boundary of the Central Shopping Area is also proposed to be changed to incorporate the Westgate site.

50. In relation to the Cox Lane Opportunity Area (Mint Quarter) the DTZ study identified a residential led scheme supporting retail and leisure. Retail was concluded to be difficult to deliver due to the distance from the main anchor stores of the town and the Site Allocations DPD reflects this through the mix of uses proposed being residential-led. The Study also suggests that this part of the town is appropriately defined as part of the Secondary Shopping Area. It should be noted that policy SP10 suggests that the western part of the site could come forward for comparison retail if the Westgate site is developed primarily for convenience retail, to help to address the scale of potential capacity for comparison retail identified in the 2010 Study. The residential element is allocated as site IP048 and it is considered the site will come forward in the medium term due to the range of landowner interests which exist.

51. The 2013 Study identified the Merchant Quarter as suitable for a mix of uses, primarily offices but with small scale retail, leisure and residential. Other than small scale ancillary uses, retail is not judged to be suitable on this site due to the distance from the

[13] Central Shopping Area Identified Frontage Supplementary Planning Guidance (Ipswich Borough Council, December 1997)

Primary Shopping Area. A mix of uses is proposed in the Site Allocations DPD to reflect this.

52. The Waterfront Opportunity Area was judged to be unsuitable for large scale retail due to its distance from the Primary Shopping Area and due to the busy routes of Star Lane / College Street which form a physical barrier to the Central Shopping Area. Large retail development in this area would also be likely to have an adverse impact on the town centre, although small scale ancillary retail would be appropriate. However, the Study identified an opportunity to further develop the leisure and evening economy through developing a mix of leisure, cultural and residential development. Policy SP11 of the Site Allocations DPD contains guidance in relation to the waterfront, specifically supporting non-retail uses in reflection of the DTZ study conclusions.

53. In relation to Tower Ramparts Shopping Centre the Study concluded that the Council should be supportive of any investment in the Centre as this is likely to strengthen the Primary Shopping Area. The DTZ Study recommended that whilst an extension which encompasses properties to the north of Crown Street may deliver a step change this is not likely to be deliverable in the short term due to the number of interests involved and the restricted nature of the site. In addition, the bus station has recently undergone enhancements as part of the Travel Ipswich scheme. Paragraph 5.15 of the Site Allocations DPD states that the Council will support the refurbishment of Tower Ramparts shopping centre and planning permission was granted in October 2014 for works related to this refurbishment and re-branding. The DPDs aim to support/direct further retail uses to the shopping centres through policy DM20 in terms of its focus for A1 retail uses in the Primary Shopping Area and policy DM23 in terms of its aim to resist further out of centre retail development.

<u>Town Centre Master Plan</u>

54. The Town Centre Master Plan, produced by Ipswich Borough Council in 2012 to accompany the adopted Core Strategy and Policies Development Plan Document (2011) suggests that the north-south axis of the town centre may become more significant over future years, recognising the regeneration that is taking place at the Waterfront. The Town Centre Master Plan sets out a vision for the town centre as follows:

‘As a major regional centre, Ipswich should strive to create prosperity - enriching the lives of residents, businesses and visitors – by creating a waterfront town centre. It is a place whose estuary location gives rise to a culture that is at once outgoing and naturally welcoming. We will strengthen these attributes. Ipswich will be vibrant and dynamic and will also be pragmatic, progressive and diverse. It can be both reflective and imaginative, in keeping with its rural setting, but also gritty and hard-working, arising from its roots. Ipswich will thrive on such individuality and difference. Above all, we want Ipswich to recapture its adventurous spirit. We should challenge convention, look further ahead and embrace new ideas. With an eye on far horizons we should use our good connections and seek influence beyond our boundaries. By reconnecting the town centre with the Waterfront and the future with our natural spirit of place, Ipswich will be celebrated for where it is going as much as where it has come from.’

55. This vision contains many synergies with the recently published Ipswich Central vision (see paragraph 59 below). The Town Centre Master Plan identifies a number of recommendations, based upon the adopted Core Strategy policies, in relation to retail, office and leisure development, marketing, transport and street scene. It should be noted that the Town Centre Master Plan precedes the DTZ 2013 Study which is the most up to date study informing the quantum and location of retail development

proposed through the Site Allocations DPD, however the broad principles remain relevant.

56. The development of the IP-One Area Action Plan specifically takes forward the following recommendations (note that transport recommendations are referred to separately in the Transport section below):
    - actively promote new developments which provide a range of unit sizes rather than large single department stores (a range of sizes of retail unit are promoted through the Opportunity Areas);
    - promote a 'cafe culture' by permitting more food and drink uses in the town centre retail heart (taken forward through changes to CS14 and DM20 which would support an element of non-retail main town centre uses in the Central Shopping Area);
    - concentrate any large-scale office development in the Ipswich Village/Portman Road areas (taken forward through the River and Princes Street Opportunity Area);
    - support and encourage businesses in the growth sectors to locate and develop within the town centre;
    - residential-led mixed-use development on the Cox Lane car park east of Cox Lane (part of the site formerly known as the 'Mint Quarter');
    - the Star Lane area to the rear of Old Customs House should be the main focus for additional student accommodation (note that the 2013 study raises a question over future demand for such accommodation);
    - sustainable mixed-use development incorporating residential should be promoted throughout the town centre (all Opportunity Areas with the exception of the River and Princes Street Corridor include an element of residential);
    - residential development should be encouraged throughout the town centre, particularly family units (all Opportunity Areas with the exception of River and Princes Street Corridor include an element of residential).

<u>Ipswich Central</u>

57. Ipswich Central is the Business Improvement District company for Ipswich. It is funded by and represents the interests of businesses in Ipswich, who vote for its continuation at intervals of a maximum of every five years. The last vote was in 2011. Ipswich Central contributes additional funds towards cleaning, planting and promotional activities. The work of Ipswich Central will assist in delivering, and in turn is supported by, policy CS14 in terms of environmental enhancements in the town centre, and policy SP15 in terms of improving the pedestrian environment.

58. In July 2015 a non-statutory document entitled 'The Vision for Ipswich: East Anglia's Waterfront Town' was published by partners – University Campus Suffolk, New Anglia Local Enterprise Partnership, Suffolk County Council, Ipswich Central, Ipswich Borough Council, Ben Gummer MP and the Ipswich Chamber of Commerce. This Vision brings together the aspirations of the partners on a range of issues and identifies a series of actions for the next few years. Some of these are relevant to the Local Plan and others are not, because they relate to matters beyond the remit of the planning system (e.g. starting works on the I-Am Project around the Museum on High Street). The two documents (the statutory 'Local Plan' and the 'Vision for Ipswich') are considered to complement each other in a helpful way. Examples of the ways in which the Local Plan supports the vision include:

    - New residential development in the town centre, including at the Mint Quarter and Merchant Quarter (including Waterfront).
    - New office development in the Princes Street corridor.

- New multi-storey car park on the site of the former multi-storey car park on Crown Street.
- Increased support for cultural and leisure uses in the Central Shopping Area (through changes to policy DM20 as part of the Core Strategy review).

Transport

59. The 2010 Study identified that the town centre has good public transport access, although more/better parking and lower parking charges were ranked 2nd and 4th in responses to the household survey as factors that would encourage them to visit the town centre more often. The national Planning Practice Guidance supports improvements to the quantity and quality of parking where necessary to ensure vitality of the town centre.

60. In terms of car parking the 2010 study identified a need for more/improved parking and lower charges. The Council has introduced a flat fee of £1 after 3pm on weekdays in eight of its car parks as well as £1 an hour charges in some, and the Site Allocations DPD looks to improve provision. However, this is within the context of continuing to promote opportunities for more sustainable modes of travel into the town centre, acknowledging that there are four Air Quality Management Areas within or close to the town centre, and as such the development principles for the opportunity areas each include enhancements for pedestrian/cycle access.

61. The studies identified above generally conclude that Ipswich is well served by public transport but that enhancements are needed in relation to parking provision.

62. Travel Ipswich, formerly known as Ipswich Transport Fit for the 21st Century (Major Scheme), identifies a number of schemes to improve transportation within Ipswich as well as encourage modal shift (see www.travelipswich.co.uk). Travel Ipswich will deliver:
    - A more sustainable and safer way of getting around town.
    - Better looking streets and public spaces.
    - Modernised bus stations and a live passenger information system.
    - An advanced transport system to encourage growth and prosperity.
    - A centralised traffic management system to allow smooth traffic flow and improve air quality.
    - Local travel information available on the web and mobile devices.

63. A number of works have been undertaken to improve pedestrian and cycle infrastructure and links in the town centre and work is underway on implementing the Urban Traffic Management System which will lead to co-ordination of traffic lights, the provision of real-time traffic and bus information and will enable late running buses to be given priority.

64. In addition to recommending implementation of the Travel Ipswich programme, the Town Centre Masterplan recommends the following:
    - provision of strategically positioned medium-sized short-stay multi-storey car parks at Tacket Street, Merchant Quarter, West End Road, Waterfront (east) and Crown car park as and when the schemes are implemented.;
    - improve bus access to the central area;
    - relocation of the two bus stations to a single bus station on the Tacket Street car park and creation of enhanced satellite bus stops strategically positioned around the town centre. This will enable the Tower Ramparts Shopping Centre to be extended northwards with a pedestrian link to Crown Street car park and creation of an improved link between the town centre and the Waterfront via Turret Lane

- making Star Lane more pedestrian friendly and easier to cross;
- improve links for pedestrians between the Waterfront and Town Centre
- complete the installation of the comprehensive Walk Ipswich information system to help pedestrians get around the town.

65. In taking the above recommendations forward, and reflecting the outcomes of the 2010 and 2013 studies, proposed policy SP17 of the Site Allocations DPD seeks to enhance and rationalise car parking provision in the town centre. Policy SP17 allocates the existing Crown Street surface car park and land at the Mint Quarter (which includes existing car parks on Tacket Street) for medium sized multi-storey car parks providing short stay shopper and visitor parking. Site IP015 on West End Road is proposed to be allocated for long stay commuter parking, which will replace the existing parking on site as well as possibly replacing existing long stay parking at Portman Road. Within the Merchant Quarter site IP054 includes potential provision for public car parking although the primary use of the site is proposed for office and leisure uses. The secondary nature of any parking at this location reflects the aims to reduce the impacts of traffic along Star Lane and enhance the links between the waterfront and the Central Shopping Area, as set out in the vision of the Town Centre Master Plan. Site allocation IP049 proposes to allocate a site to the east of the Waterfront for parking as well as education/waterfront uses, replacing the existing temporary surface car park.

66. In relation to making Star Lane more pedestrian friendly and easier to cross, proposals for the Merchant Quarter Opportunity Area include considering the potential to widen the route to provide enhanced pedestrian/cycling routes. Under the Travel Ipswich scheme footpath widening and a new pedestrian crossing have already been completed on Star Lane. The provision of a new crossing across the Wet Dock, supported under policy SP16, would also assist in reducing the impacts of vehicular traffic along Star Lane.

67. Improvements to bus access and provision of wayfinder information to facilitate and encourage walking around the town centre are being delivered through Travel Ipswich.

68. In reflection of the changes to the Use Classes Order in respect of betting shops and payday loan shops (see paragraph 19 above), additional modifications to the plans are proposed to ensure that these are considered in the same way as A2 uses and that no change to the proposed policy position results.

District and Local Centres

69. District and Local Centres are ‘defined centres’ in the context of policy DM23 and in relation to the NPPF requirement to define a hierarchy of centres. District and Local Centres were described in Planning Policy Statement 4, now replaced with the National Planning Policy Framework, in terms of the types of uses they may have. The NPPF does not contain any alternative definition and it is therefore considered appropriate to conclude that these descriptions remain relevant. These descriptions were also referred to in the 2010 Retail and Commercial Leisure Study. The descriptions are as follows:

- District centres: ‘groups of shops often containing at least one supermarket or superstore, and a range of non-retail services such as banks, building societies and restaurants, as well as local public facilities such as a library.’

- Local centres: ‘A range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette.’

70. The district and local centres in Ipswich are shown on Plan 1 accompanying the Core Strategy DPD Review. In terms of catchments, district centres generally serve an 800m catchment (approx. 10 minutes walking time) and local centres generally serve a 400m catchment (approx. 5 minutes walking time). This is reflected in the range of retail and other services provided in each centre and in their location relative to centres of population. This is supported by the assertion in the 2013 NLP study that the northern part of Ipswich is currently less well served, as it is noted that the area south and north of Colchester Road and Valley Road is not within either 800m of a district centre or 400m of a local centre.

71. The 2010 Retail and Commercial Leisure Study identified that the small supermarkets and convenience stores within district and local centres serve the day to day top-up needs of the local resident population to varying degrees. Overall the study concluded that these centres are attractive places to shop, with a good mix of retail and service businesses. It concluded however that those with four units or fewer or lacking a major food/convenience store or only serving a small neighbourhood may warrant de-designation. There are two centres which have fewer than three units - Colchester Road local centre (no. 15) and Lavender Hill local centre (no. 38). However the former has a food store which is not provided at the next nearest centre (Brunswick Road), is on the edge of the less well-served northern part of Ipswich and its catchment is mostly outwith the catchment of Woodbridge Road district centre. The catchment of the latter is mostly not served by any other local centre. These local centres have therefore been retained as such.

72. Three former local centres were deleted upon the adoption of the 2011 Core Strategy and Policies DPD. These were Grove Lane, Clapgate Lane and Suffolk Road/Norfolk Road/Tuddenham Avenue local centres. These centres were operating with a relatively large proportion of residential uses and a lack of variety of retail and commercial uses that would support their function as local centres. The results of recent district and local centre reports would not suggest that it would be appropriate to delete any further centres as part of this review of the Core Strategy.

73. The district and local centres are monitored annually in relation to vacancy rates and occupancy. The latest survey was undertaken in spring 2015. This shows that the number of vacant units within district centres is 37 (12.4% of all district centre units excluding residential), although a large number of these are in Duke Street (a relatively new centre). This is a decrease in vacant units from the 43 vacant units in 2014, with premises being occupied by a range of a new uses with cafes and beauty related uses featuring highly amongst the new occupants. Within local centres there are currently 31 vacant units, representing 8.5% of all local centre units (excluding residential). This is an increase on the 22 vacant units recorded in 2014. Units across all centres which have become vacant represent a range of uses including a convenience store, a public house, a kitchen shop and a photographers[14].

74. The centres continue to contain a mix of retail and other uses typical to local and district centres. Across the district and local centres, A1 uses represent the predominant use type (60.9% of all units excluding residential), with A2-A5 uses representing 25.2%. There are a total of 61 residential units within the identified frontages of the district and local centres, however there have been no losses of units to residential use between the 2014 and 2015 surveys. Residential uses are mostly located within the larger, older centres which may have traditionally been predominantly residential, rather than within the purpose built centres. The survey results suggest the centres are continuing to

[14] Please note the vacancy figures in this paragraph correct a previous version of this Topic Paper

serve the function for which they were designated and would therefore justify their protection through policies DM21 and DM23.

75. The Proposed Submission Site Allocations DPD proposes to allocate a new district centre at the junction of Sproughton Road and Europa Way. The need for this is highlighted on Plan 1 accompanying the Core Strategy DPD Review which shows that this area of Ipswich is currently outwith the 800m distance of any existing District Centre, although there is a local centre on Bramford Road which would serve the northern part of this area. This new centre would serve residents of the further housing planned in the area as well as existing residents. An original planning permission for the new centre was granted in 2006 for a 1,796m^2 food store and up to 14 convenience units, comprising A1, A2, B1 A3-A5, D1 and D2 (see Appendix 1 for definition) totalling 3,194m^2, along with 110 flats and 32 retirement dwellings. However this was not implemented and the delivery of the rail chord involved the use of some of the land relating to the original permission. A planning application was submitted in February 2015 for a foodstore on part of the site comprising 1,726 sqm gross internal floorspace and permission has been granted pending a Section 106 agreement. The Pre-Submission Main Modifications to the Site Allocations plan includes an allocation the entire site for a District Centre, in reflection of the non-implementation of the 2006 permission.

76. A further new district centre and two local centres are also proposed as part of the Ipswich Garden Suburb development. The 2013 NLP study identified that this area of Ipswich is currently poorly served with local shops, particularly in terms of choice and foodstore provision. The study identifies that provision of new shops at the Garden Suburb would serve new residents and also address current deficiencies in provision for existing residents. The NLP study considered a number of scenarios for new provision with 2A most closely representing the Garden Suburb as currently proposed in policy CS10. The study identified needs as identified in the tables below and also identified broad locations for the district centre and two local centres which have also been carried forward through the Core Strategy and Policies DPD Review.

Facility	Requirement	
	sq.m net	sq.m gross
Large Convenience Store	1,070 – 1,660	1,640 – 2,560
Convenience Stores	280	400
Comparison Stores	1,170 – 1,220	1,560 – 1,620
Service (non-retail Class A1, plus Class A2, A3, A4 and A5 uses)	1,030 – 1,320	1,470 – 1,890
Total Retail Floorspace	**3,550 – 4,480**	**5,070 – 6,470**
Approximate land take	**Up to 2-2.5 hectares**	

Table 2a: Retail requirements for Ipswich Garden Suburb (Scenario 2A) – District Centre

Facility	Requirement	
	sq.m net	sq.m gross
Convenience Stores	490	700
Comparison Stores	600	800
Service (non-retail Class A1, plus Class A2, A3, A4 and A5 uses)	490	700
Total Retail Floorspace	**1,580**	**2,200**
Approximate land take for local centres (combined)	**Up to 1.5 hectares**	

Table 2b: Retail requirements for Ipswich Garden Suburb (Scenario 2A) – Each Local Centre

77. Policy DM21 relates to proposals within district and local centres, the development of new centres and the provision of community facilities as part of centres. The range of uses permitted under DM21 has been amended to reflect A3 and A4 uses no longer classed as retail (see above) and also to allow an element of Sui Generis uses that would be appropriate to the centre. Such uses should be appropriate within the context of the definition of a district or local centre as set out in the definitions above. The requirement for a marketing strategy is to ensure that sufficient opportunities to secure an A1-A5 or similar use have been investigated.

78. In reflection of the changes to the Use Classes Order in respect of betting shops and payday loan shops (see paragraph 19 above), additional modifications to the plans are proposed to ensure that these are considered in the same way as A2 uses and that no change to the proposed policy position results.

Out of Centre and Edge of Centre

79. As referred to above, the NPPF sets out a town centre first approach to retail and main town centre uses. There are a number of out of centre retail parks and single units both within and just outside of the Borough. The 2015 Out of Centre Retail Survey, which focuses on the retail parks within the Borough, identified that most of these units are occupied, with the exception of Anglia Retail Park where five of its twelve units were identified as vacant. Most of the units are in A1 use (79% - including vacant A1 units) or other 'main town centre uses' (17%), with just 2 units occupied by other uses (vehicle sales and servicing).

80. The 2010 Retail and Commercial Leisure Study identifies that there is strong provision of out of centre foodstores, retail warehouses and leisure parks in the Borough or just outside of the Borough. The study found that there is greater provision of both convenience and comparison retail floorspace in locations outside the town centre in the Ipswich catchment area (which extends beyond the Borough) than within the town centre. It concludes that there is no demonstrable need for additional out of centre retail floorspace in Ipswich. The 2013 DTZ Study reflects this conclusion and identifies the possibility of new out of town stores as a potential threat to the town centre. The policy approach in the Core Strategy Review DPD is therefore to continue to resist out of centre and edge of centre retail and other 'main town centre use' development. This is also consistent with the policy approach of the NPPF.

81. Policy DM23 relates to retail uses (i.e. A1, A2 and A5 – see Appendix 1 for definitions) and reflects the sequential and impact test as set out in the Planning Practice Guidance. The threshold of 200sqm net in relation to the need for a sequential assessment and impact assessment is carried over from the adopted Core Strategy (2011), although has been amended from gross to net due to the fact that retail proposals and assessments usually relate to net floorspace.

82. The NPPF sets a default threshold of 2,500sqm gross[15] in relation to the impact assessment and sets no threshold in relation to the sequential assessment. However in the context of Ipswich it is considered necessary to continue to use the threshold of 200sqm net due to the potential in particular for cumulative impacts on centres from developments of considerably less than 2,500sqm gross particularly when considering pressure for increasing the percentage of non-bulky sales in out of centre retail units and the relatively small size of retail units in local and district centres. This also reflects the approach to conditioning the amount of floorspace which would be acceptable for

[15] Note that the NPPF does not specify net or gross, however 2,500 sqm gross is specified in the national Planning Practice Guidance.

the sale of ancillary and incidental goods – this is proposed to be limited to 200sqm net and it would therefore be logical for this to be reflected in requirements for sequential and impact testing.

83. The 200sqm threshold also appropriately reflects the size of units in Ipswich which could be impacted upon by out of town retail development. Many of the district and local centres in Ipswich are characterised by relatively small units when compared to the purpose built district centres of some of the country's larger towns and cities. In the Central Shopping Area, an analysis of properties available on the market demonstrates that an impact could occur from out of town retail development of considerably less than 200sqm. Properties for rent on 28th April 2015 were between the sizes of 23sqm and 280sqm, with the average of all 13 properties being 150sqm. The exercise was repeated on 17th June 2015 which revealed the properties for rent were between the sizes of 23sqm and 848sqm, with the average size of all 18 properties being 190sqm[16]. The lower threshold is also a reflection of the conclusions of the 2010 and 2013 Studies which between them would suggest that any scale of further out of town retail development should be resisted.

84. The list of bulky goods set out in paragraph 9.141 under policy DM23 of the Core Strategy Review DPD is based on the Council's Out of Centre Shopping Supplementary Planning Guidance[17] and on conditions relating to recently approved planning applications. The list reflects those items that would generally need to be transported by car. To bring the policy in line with the NPPF the supporting text clarifies that the policy only relates to A1, A2 and A5 uses, not to A3 and A4 uses which are included within the classification of 'main town centre uses' in the NPPF and would therefore be considered under policy DM22.

85. In relation to non-retail 'main town centre uses' policy DM22 does not set a threshold and therefore the 2,500sqm gross contained in the NPPF would apply to assessing the impact of such proposals, although the sequential approach should apply to all proposals. This is considered to be appropriate because such uses generally occupy larger premises.

Leisure Uses

86. The 2010 Retail and Commercial Leisure Study identified Cardinal Park, in an edge of centre location in Ipswich, as a key leisure venue. It concluded that overall there is a 'reasonable range and choice of commercial entertainment and cultural facilities, including pubs and restaurants, cinema, ten-pin bowling, health and fitness clubs, museums and theatres. This broad range needs to be maintained and enhanced to prevent further dilution to competing centres.' The 2013 Study identified that such uses are likely to become more important in terms of the future vitality of the town centre.

87. The 2010 Study identified a shortfall in health and leisure facilities, that over the longer term there would be demand for new cinema screens in the town centre and that there is a need for a bowling facility in the town centre. Site allocation IP260 therefore allocates the former Odeon Cinema at Major's Corner for leisure uses and leisure uses are identified as a development opportunity within the River and Princes Street Corridor Opportunity Area as a means of drawing such uses into the town centre. Policies CS14 and DM22 would also support the provision of further such uses in the town centre, with a limited level of provision in the Central Shopping Area, should they come forward. As mentioned above, planning permission for change of use of part of the Buttermarket

[16] Property Link / Estates Gazette
[17] Out of Centre Shopping Supplementary Planning Guidance (Ipswich Borough Council, July 1997)

shopping centre to provide a cinema, gym and a greater floorspace of A3 (restaurant and café) uses was granted in June 2015.

88. The 2013/14 Authority Monitoring Report shows that crime is falling in Ipswich and the town centre was awarded a Purple Flag accreditation in 2012 recognising excellence in the management of the town centre at night. Such trends are likely to assist in encouraging successful provision of leisure uses into the town centre.

Appendix 1 – Use Classes

Source: Planning Portal
http://www.planningportal.gov.uk/permission/commonprojects/changeofuse/

A1 Shops - Shops, retail warehouses, hairdressers, undertakers, travel and ticket agencies, post offices (but not sorting offices), pet shops, sandwich bars, showrooms, domestic hire shops, dry cleaners, funeral directors and internet cafes.

A2 Financial and professional services - Financial services such as banks and building societies, professional services (other than health and medical services) including estate and employment agencies.

A3 Restaurants and cafés - For the sale of food and drink for consumption on the premises - restaurants, snack bars and cafes.

A4 Drinking establishments - Public houses, wine bars or other drinking establishments (but not night clubs).

A5 Hot food takeaways - For the sale of hot food for consumption off the premises.

B1 Business - Offices (other than those that fall within A2), research and development of products and processes, light industry appropriate in a residential area.

B2 General industrial - Use for industrial process other than one falling within class B1 (excluding incineration purposes, chemical treatment or landfill or hazardous waste).

B8 Storage or distribution - This class includes open air storage.

C1 Hotels - Hotels, boarding and guest houses where no significant element of care is provided (excludes hostels).

C2 Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.

C2A Secure Residential Institution - Use for a provision of secure residential accommodation, including use as a prison, young offenders institution, detention centre, secure training centre, custody centre, short term holding centre, secure hospital, secure local authority accommodation or use as a military barracks.

C3 Dwellinghouses - this class is formed of 3 parts:
- C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.
- C3(b): up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.
- C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger.

C4 Houses in multiple occupation - small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.

D1 Non-residential institutions - Clinics, health centres, crèches, day nurseries, day centres, schools, art galleries (other than for sale or hire), museums, libraries, halls, places of worship, church halls, law court. Non-residential education and training centres.

D2 Assembly and leisure - Cinemas, music and concert halls, bingo and dance halls (but not night clubs), swimming baths, skating rinks, gymnasiums or area for indoor or outdoor sports and recreations (except for motor sports, or where firearms are used).

Sui Generis - Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: theatres, houses in multiple occupation, hostels providing no significant element of care, scrap yards. Petrol filling stations and shops selling and/or displaying motor vehicles. Retail warehouse clubs, nightclubs, launderettes, taxi businesses, amusement centres and casinos. Betting shops and payday loans shops.