



Broxtowe  
Borough  
COUNCIL

# **Broxtowe Borough Council**

## **Response to Matter 3:**

## **Town Centre and District Centre Uses**

**November 2018**

## **BROXTOWE LOCAL PLAN PART 2 EXAMINATION**

### **MATTERS, ISSUES AND QUESTIONS**

#### **Matter 3 Town Centre and District Centre Uses**

**Issue: Whether the approach to retail provision is justified, effective and consistent with the NPPF and the Aligned Core Strategy.**

**1. Do the thresholds for A1 uses reflect the current situation in relevant centres and are they based on robust evidence? Do they achieve an appropriate balance between maintaining the retail function in centres and allowing flexibility to accommodate a range of other uses?**

1.1. The Council is of the view that the thresholds set out within the Policy will achieve an appropriate balance between maintaining the retail function of the centres whilst still allowing the flexibility for the centres to accommodate a variety of other, non-Class A1 uses. The Council believes that the thresholds for Class A1 uses do reflect the current situation in the Borough and that these are based upon robust evidence, including the experience of the Borough's Town Centre and Economic Development Officers.

**2. Bearing in mind part 2 of Policy 10 deals with upper floors, is part 1c) necessary to make the policy effective?**

2.1. The Council is of the view that part 1c) is necessary in order to make the Policy effective, as this part of the Policy requires that reasonable steps are taken to secure the use of upper floors for a 'Main Town Centre Use', even in cases where the application only relates to a ground floor use. Part 2 of the Policy confirms the acceptability of the use of upper floors but does not require applicants to consider the use of these areas as a part of proposals for the ground floors of properties. These two parts of the Policy are therefore complementary.

**3. What evidence is there to support the alterations to the Town Centre boundary of Beeston and the District Centre boundaries of Eastwood, Kimberley and Stapleford? On what basis have the new boundaries been defined?**

3.1. The boundaries to the town and district centres have been amended based upon the experience and expertise of the Council's specialist Town Centre Team to best reflect local evidence 'on the ground' in each of the centres. The Council is of the view that this is the best available method for establishing the most appropriate boundaries for the town and district centres. The recommendations of other reports and studies have also fed into this process, including the findings of the [Broxtowe, Gedling, Nottingham City & Rushcliffe Retail Study 2015 \(RE/01\)](#) and [Beeston Town Centre Plan SPD 2008 \(PD/28\)](#).

- 3.2. The [Grimsey Review 2](#)<sup>1</sup>: It's time to reshape our town centres', published in July 2018, recommends that there is a need to *'accept that there is already too much retail space in the UK and that bricks and mortar retailing can no longer be the anchor for thriving high streets and town centres. They need to be repopulated and re-fashioned as community hubs, including housing, health and leisure, entertainment, education, arts, business/office space and some shops'*. This indicates that the traditional 'retail core' of town centres may need be contracted.
- 3.3. The Council has undertaken a Sustainability Appraisal for the options of altering each of the town and district centre boundaries. The results are set out within a [Sustainability Appraisal Addendum \(BBC/06\)](#). This additional Sustainability Appraisal Addendum has found that the option of slightly updating and contracting the town centre boundary of Beeston and the district centre boundaries of Eastwood, Kimberley and Stapleford scores slightly better overall than the option of retaining all of the town and district centre boundaries as they are currently, as per the 2004 adopted Local Plan Proposals Map. It should be noted, however, that many of the SA score differences are marginal.
- 3.4. This SA concludes, in relation to the option of amending the town and district centre boundaries, that there is a minor positive effect upon the Housing, Heritage, Crime and Natural Resources & Flooding Objectives. In addition, there is a minor positive effect upon the Social Objective in the cases of Eastwood and Stapleford. The only potential minor negative effects of the option of amending the boundaries would be on the Employment and Economic Structure Objectives, as a result of potentially fewer acceptable locations for town centre-related development to take place and potentially fewer employment opportunities. However, it is considered that these effects will be mitigated through the implementation of other Policies within the Part 2 Local Plan, such as Policy 10, through the more intensive use of existing buildings within the town and district centres, including upper floors.

**4. Is Policy 13 justified, effective and consistent with national policy? What is the evidence to justify the local floor space threshold?  
What is the basis for the thresholds at which impact assessments will be required and are they appropriate and justified by the evidence?**

- 4.1. The Council is of the view that Policy 13 is justified, effective and consistent with national policy. The view of the Council is that the 500 sq. m. thresholds are both appropriate and justified by the available evidence (see [page 130 of the Broxtowe, Gedling, Nottingham City & Rushcliffe Retail Study 2015 RE/01](#)).
- 4.2. The 500 sq. m. threshold would allow for the development of a mini-supermarket for convenience shopping only (at a size of unit similar to that occupied by many of the typical Tesco Express, Sainsbury's Local or Little Waitrose brands); the development of larger supermarkets would therefore be restricted. The Council is of the view that this approach offers an appropriate balance and is based upon the most appropriate available evidence.

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<sup>1</sup> <http://www.vanishinghighstreet.com/wp-content/uploads/2018/07/GrimseyReview2.pdf>

**5. Is the gross floorspace for an individual unit within the Centre of Neighbourhood Importance defined in Policy 14 justified by the evidence? Similarly is the residential threshold of 30% appropriate and justified by the evidence?**

- 5.1. The Council is of the view that Policy 14 is justified, effective and consistent with national policy. The view of the Council is that the 500 sq. m. threshold is both appropriate and justified by the available evidence. This threshold is the same as is used within Policy 13, and has been selected for similar reasons. This also ensures consistency between Policies 13 and 14. The threshold of 30% is based upon evidence, including existing land uses in the area. The Council is of the view that this approach offers an appropriate balance between uses whilst at the same time offering flexibility for new development.

**6. Is Policy 12 regarding edge of centre retail in Eastwood effective and justified?**

- 6.1. The Council recognises the Morrison's supermarket in Eastwood as a valuable local asset which contributes to the retail offer and economic vitality and viability of the centre; the large car park, in particular, offers a valuable facility to visitors to the town. The view of the Council is that it is reasonable to allow for limited alterations and extensions to the retail uses within this area, provided that any proposals enhance links to the main part of the centre and that any proposals do not adversely impact upon the vitality or viability of the centre as a whole. Whilst it could be argued that this area is somewhat separated from the main part of the centre, the Council is of the view that this area does complement the rest of the district centre and as such it would be unreasonable to prevent limited alterations or extensions to premises in this area. The Council therefore concludes that this Policy is both effective and justified.

**7. ACS Policy 6 identifies Stapleford as a centre in need of enhancement or to be underperforming and that Part 2 plans will be used to enhance their vitality and viability. What does the Plan propose in this regard?**

- 7.1. The Borough Council is aware of the challenges faced by the Stapleford district centre. Whilst not existential, the challenges faced by the district centre are nevertheless real. In order to improve the vitality and viability of this centre, the Part 2 Local Plan proposes amending the district centre boundaries in order to 'contract' the size of the centre. Focusing retail development on a smaller area instead of a larger, more 'spread-out' retail area separated by other uses and vacant units, should provide visitors with a higher quality shopping area with fewer vacancies and more town centre-related uses clustered together. These changes have been proposed as a result of discussions with the Borough Council's Town Centres Team and following the Employment and Retail Workshop (see [page 26 Part 2 Local Plan Consultation Statement \(CD/20\)](#)).
- 7.2. Further supporting information is also set out within the [Sustainability Appraisal Addendum \(BBC/06\)](#), as set out earlier in this document.

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