

# Appendix C6: Retail & Commercial Leisure Topic Paper

## Introduction

A key aspect of sustainable communities is good access to shops and other local services such as cafés and restaurants which help meet the day-to-day needs of the local communities. It is therefore important that both new and existing communities have easy access to these types of facilities, including during the construction phase to reduce the need for residents to travel and, maintain vibrant and viable local and neighbourhood centres

Cambridge's city centre provides the majority of the city's floorspace for both retail and commercial leisure activities. As such, for local people it is an important destination for shopping, tourism, cultural, arts and recreational pursuits and serves as a regional destination for retail, arts and other leisure activities.

At a more local scale, the various district, neighbourhood and local centres distributed around the city provide a range of local services and community facilities that serve the day-to-day needs of residents and local workers. A good example of which is Mill Road, located to the east of the city centre consisting of two district centres, one on either side of the main railway bridge. The road is characterised by its large number of diverse and independent retail traders creating a cosmopolitan feel to the area. There are a wide range of restaurants, cafés and hot food takeaways, particularly west of the railway bridge, which add to its viability although this can also lead to amenity problems.

It is therefore important that new centres help nurture equivalent diversity and distinctiveness of an area. This can be achieved by promoting a range of retail options including independent retailers to avoid creating bland, unappealing centres. Similarly, it is important to limit the number of uses that, if allowed to dominate an area could lead to anti-social behaviour and amenity issues.

The broad range of services and facilities already provided in and around the city make an important contribution to the vibrant and diverse character of the city and its charm as a place to inhabit and visit. It is therefore essential that any new centres at NEC are given careful consideration to ensure they do not have an impact on those that already exist.

This topic paper has the purpose of explaining how new retail proposals at North East Cambridge should contribute to new and existing centres.

## Key Documents

- National Planning Policy Framework / Guidance
- Cambridgeshire Green Infrastructure Strategy
- The Greater Cambridge Retail and Leisure Study (2020)
- NEC Retail Statement (2020)
- Cambridge Local Plan 2018

## National Planning Policy Framework / Guidance

### National Policy (NPPF)

A revised National Planning Policy Framework was published February 2019. National policy in the NPPF includes the presumption in favour of sustainable development at the heart of the planning system. This sets a clear expectation on planning authorities to plan positively to promote development and create sustainable communities.

Annex 2 of the NPPF, in the glossary defines:

Main town centre uses as “Retail development (including warehouse clubs and factory outlet centres); leisure, 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 and concert halls, hotels and conference facilities).”

Town centre as “Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.”

Paragraph 53 supports the use of Article 4 directions to remove national permitted development rights should be limited to situations where this is necessary to protect local amenity or the well-being of the area.

Paragraph 85 explains how planning policies and decisions should support the role of centres, by taking a positive approach to their growth, management and adaptation. Planning policies should: a) define a network and hierarchy of centres and promote their long-term vitality and viability. A flexible approach should also be taken to support their growth as well as allowing them to adapt to changes in the

retail and leisure industries, permitting a suitable mix of uses which reflects their distinctive characters; b) define the centres and the range of uses permitted in such locations, as part of a positive strategy for the future of each centre; and d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed.

Paragraph 86 advises Local Planning Authorities to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan.

Paragraph 89 recommends an impact assessment is completed if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m of gross floorspace). This should include assessment of: a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

Paragraph 90 advises that if an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 89, it should be refused.

Paragraph 91 explains how the planning policies and decisions should aim to achieve healthy, inclusive and safe places. The should a) promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other, examples of which include mixed-use developments, strong neighbourhood centres, highly accessible street layouts for both pedestrians and cyclists; and active street frontages; b) are safe and accessible, which reduce crime and the fear of crime, include high quality public space, which encourage the active and continual use of public areas; and c) enable and support healthy lifestyles, including identified local health and well-being needs, examples include the provision of local shops, access to healthier food and layouts that encourage walking and cycling.

Paragraph 92 explains how planning policies and decisions should provide social, recreational, and cultural facilities including services needed by the community. It includes the need for: (a) local authorities to plan positively for the provision of community facilities such as local shops, meeting places, public houses and other local services to enhance the sustainability of communities and residential environments; (b) take account of, and supporting the delivery of local strategies to improve the health, social and cultural well-being of all sections of the community; c) 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; d) ensure that established shops, facilities and services are able to develop and

modernise, and are retained for the benefit of the community; and e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

## National Guidance (NPPG)

National Guidance (NPPG) provides a series of notes about retail, the function of centres and importance of creating healthy environments. These include explanations about how centre uses can be allowed to change as well as providing more detail about the application of a sequential test and impact assessment. Given the detailed guidance, these are only summarised as follows:

Paragraph: 001 Reference ID: 2b-001-20190722

This section summarises the role planning authorities can perform in supporting centres and how to do so including, the promotion of a centre's vision and the assessment of the impact this may have on neighbouring centres. The inclusion of a wide range of complementary uses can, help to support the vitality of centres. The same is true of temporary activities such as 'pop ups', which will often benefit from permitted development rights.

Evening and night time activities have the potential to increase economic activity within centres and provide additional employment opportunities. They can allow centres to diversify and help develop their unique brand and offer services beyond retail. In fostering such activities, local authorities will also need to consider and address any wider impacts in relation to crime, noise and security.

Paragraph: 007 Reference ID: 2b-007-20190722

When is planning permission not required for changes involving town centre uses?

This section briefly summarises when planning permission is required and includes examples of some permitted development rights that allow a change of use without any application process. Further detail is also provided for some permitted development rights that allow for a change of use subject to prior approval by the local planning authority for specific planning matters.

Paragraph: 008 Reference ID: 2b-008-20190722

Are there other permitted development rights that can support flexibility in town centres?

To support new ventures and pop-ups and avoid buildings being left empty, a separate right allows a range of uses to convert temporarily to another use for a single continuous period of up to three years. This allows start-ups to test a new business model, and then to seek planning permission for the permanent change of use on that or another site.

The same right now allows for the temporary change of use to specified community uses (health centre, art gallery, museum, public library, public hall or exhibition hall) to provide a greater mix of uses on the high street and increase footfall, and bring community uses closer to communities.

Other permitted development rights provide for physical works to support the operation of shops or financial and professional services.

Paragraph: 009 Reference ID: 2b-009-20190722

What is the sequential test?

The sequential test guides main town centre uses towards town centre locations first, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations (with preference for accessible sites which are well connected to the town centre). It supports the viability and vitality of town centres by placing existing town centres foremost in both plan-making and decision-taking.

Paragraph: 010 Reference ID: 2b-010-20190722

How should the sequential approach be used in plan-making?

In plan-making, the sequential approach requires a thorough assessment of the suitability, viability and availability of locations for main town centre uses. It requires clearly explained reasoning if more central opportunities to locate main town centre uses are rejected.

This section provides a checklist setting out the matters that need to be considered when using the sequential approach as part of plan-making. These include

- A needs assessment for main town centre uses.
- An assessment of alternative town centre site for their suitability, accessibility, availability and viability
- An assessment of the next sequentially preferable sites

Paragraph: 011 Reference ID: 2b-011-20190722

This section explains how the sequential test should be used in decision-making. The application of the test will need to be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites will need to be discussed between the developer and local planning authority at the earliest opportunity. A checklist of considerations is also provided to determine whether a proposal complies with the sequential test.

Paragraph: 012 Reference ID: 2b-012-20190722

How should locational requirements be considered in the sequential test?

Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification.

Paragraph: 013 Reference ID: 2b-013-20190722

How should viability be promoted?

The sequential test supports the Government's 'town centre first' policy. However as promoting new development on town centre locations can be more expensive and complicated than building elsewhere, local planning authorities need to be realistic and flexible in applying the test.

Paragraph: 003 Reference ID:53-003-20191101

A healthy place is defined as one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing.

It is a place which is inclusive and promotes social interaction. It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.

## Local Council Strategy Documents

### The Greater Cambridge Retail and Leisure Study

The Greater Cambridge Shared Planning Service have commissioned The Greater Cambridge Retail and Leisure Study to support the review of the joint Local Plans for Cambridge and South Cambridgeshire. The study comprises of three sections: a review of current retail and leisure provision in Greater Cambridge; a NEC Retail Statement (2020) informing the quantum of retail needed to support the vision for the North East Cambridge Area Action Plan; and to inform plan preparation of the Greater Cambridge Local Plan.

### NEC Retail Statement (2020)

The NEC Retail Statement (2020) draws on evidence collated as part of The Greater Cambridge Retail and Leisure Study and focuses on the NEC area, setting out the required response to the Study Brief in order to inform the preparation of the AAP. Based on sound evidence, it advises on the scale and mix of retail and leisure floorspace within the NEC, addressing the opportunities and challenges for the site and identifying how provision will relate to existing town centres and also the needs of surrounding existing communities.

It provides conclusions on the most appropriate scale of retail and leisure floorspace to ensure the new development meets the needs of the emerging new community whilst seamlessly integrating into the existing network and hierarchy of centres. The Councils require this piece of work to provide assurance that new retail floorspace will not have a detrimental impact on existing centres. The outputs provide recommendations in respect of retail policy to inform preparation of the preferred option AAP.

It sets out the total floorspace for each centre and a guide to the number and size of units in each to advise on commercial composition and scheme design. These should support smaller shops providing local shopping facilities and small-scale commercial services/facilities such as cafés and restaurants to help meet the day-to-day needs of local people. The figures include providing convenience foodstores in each centre, such as a larger store of 800 sq m net within the district centre. It also notes that any changes within the overall floorspace threshold (i.e. larger store, more than one anchor store) must be considered alongside the car free vision of NEC and related issues around car parking levels.

The Retail Statement also explains the recommended floorspaces for comparison retail, i.e. non-food shops and for all other uses within each centre. It also includes consideration for the use of Article 4 Directions to restrict changes of use that do not

require planning permission, but which could adversely affect the vitality and vibrancy of NEC's centres.

## Cambridge Local Plan 2018

### Policy 6: Hierarchy of centres and retail capacity

Policy 6 outlines the hierarchy of centres in Cambridge along with the circumstances when a sequential approach and, or impact assessment are required. It also explains the amount of retail capacity that is needed to be provided and where this should be delivered.

### Policy 10: The City Centre

Policy 10 ensures that Cambridge City Centre is the primary focus for developments attracting a large number of people and for meeting retail, leisure, cultural and other needs appropriate to its role as a multi-functional regional centre. Particular focus is also given towards retail, leisure and other mixed uses at the Fitzroy/Burleigh Street/Grafton Area of Major Change, under Policy 12.

### Policy 72: Development and change of use in district, local and neighbourhood centres

Policy 72 controls new A1 (shop) uses and other uses in Cambridge's district, local and neighbourhood centres explaining when these will be permissible including the uses suitable on ground floors and those above.

### Policy 73: Community, sports and leisure facilities

This policy is applicable to existing facilities and sites last used for community, sports or leisure purposes, in order to avoid situations where these facilities are lost through demolition without any planned replacement facility. The definition of community facilities is provided in Table 8.2, overleaf. Community facility and leisure categories are defined in Table 8.3, overleaf. A community facility category is related to its size and the area it serves while the three broad leisure categories (sports, arts and culture, and entertainment) relate to their function.

Commercial leisure is treated as any leisure use that receives no public subsidy. These can include any use in either of the three leisure categories below as well as other uses such as a café, public house or restaurant where people congregate in their leisure time.

**Table 8.2: Definition of community facilities**

<b>Community facilities include:</b>
<ul style="list-style-type: none"> <li>• Uses in class D1<sup>1</sup> (non-residential institutions), except university teaching accommodation. Core class D1 uses include:               <ul style="list-style-type: none"> <li>○ the provision of traditional and complementary medical or health services, except for the use of premises ancillary to the home of the consultant;</li> <li>○ the provision of education;</li> <li>○ a crèche, day nursery or playgroup;</li> <li>○ a place of worship or religious instruction;</li> <li>○ a community centre, public hall or meeting place; and</li> <li>○ a public library</li> </ul> </li> <li>• A local retail unit or public house (Note: safeguarded public houses are specifically addressed by Policy 76).</li> <li>• The following sub-categories of class C2 (residential institutions):               <ul style="list-style-type: none"> <li>○ hospitals, residential schools, colleges or training centres; and</li> <li>○ other uses that provide either a community service or a public utility such as facilities for the emergency services, public toilets and court buildings.</li> </ul> </li> </ul> <p>N.B. The lists of uses are not exhaustive.</p>

**Table 8.3: List of community facility and leisure categories**

<b>Category of provision</b>	<b>Example uses (not exhaustive). A use may fall into more than one category depending on the area it serves</b>
Local	<ul style="list-style-type: none"> <li>• A community or civic room</li> </ul>
Neighbourhood	<ul style="list-style-type: none"> <li>• Community house – typically the size of an average three-bed house – or community hall</li> <li>• Primary school</li> <li>• Day nursery</li> </ul>
District	<ul style="list-style-type: none"> <li>• Public library</li> <li>• Primary care facility</li> <li>• Community centre and other shared use/services buildings</li> <li>• Function room</li> <li>• Secondary school</li> <li>• Place of worship</li> </ul>
City-wide	<ul style="list-style-type: none"> <li>• Acute health care</li> <li>• Civic and court buildings</li> <li>• Colleges and universities</li> </ul>
<b>Leisure category</b>	<b>Example uses (not exhaustive)</b>
Leisure sports	Leisure sport facilities allow for supervised, organised or competitive sports, primarily indoors. Facilities include sports stadia, ice rinks, sports halls, boxing centres, badminton and

<sup>1</sup> Use Classes Order (as amended)

	squash courts, swimming pools (including outdoor), gymnasiums, indoor bowling centres, indoor tennis centres, health and fitness centres
Leisure arts and culture	Arts and cultural uses such as concert halls, performance venues and theatres, cinemas, ten-pin bowling alleys, punting stations, museums and galleries
Leisure entertainment	Nightclubs, snooker/pool halls, bowling alleys

## Approach to Providing Retail at North East Cambridge

### How the retail policy does what it does and why

#### Strong local centres to serve the needs of local people living and working at NEC

NEC will provide a balanced range of shops and services that meet the needs of local residents, employees and visitors to the area while not creating a ‘destination’ location for people living further afield and reduce the reliance to travel by car.

In order to achieve these aspirations, it is essential that new centres provide local-in-scale uses that do not create a need for ancillary car parking which may in turn facilitate and motivate people to drive to the area. It is therefore necessary to resist any proposal that will create a need for specific car parking provision.

It is essential that NEC develops strong, accessible neighbourhood centres, by supporting a balanced yet diverse range of uses. These will meet the day-to-day needs of local people with clear intent to limit those uses which can encourage anti-social behaviour or unhealthy lifestyles. Strong and attractive centres cannot be created if they are dominated by a concentration of either less active uses such as a row of betting shops or night-time uses such as a row of takeaways. An over-concentration of these types of uses could lead to amenity issues.

Attractive, accessible and well-designed centres will also support their vibrancy and activity. This, in turn helps form and support local communities as well the character of the area. They can also encourage healthier lifestyles by providing opportunities to shop on foot or on bike as well as reducing the need for people to drive to access the most basic of necessities. It is important to create healthy, inclusive and safe places to ensure they support their local communities.

#### Hierarchy of Centres & Quantum of Permissible Development

Policy 10a defines: the proposed hierarchy of centres, i.e. the district, local and neighbourhood centres; the quantum of permissible floorspace for each type of floorspace category: convenience (food shopping); comparison (non-food) shopping;

and all other uses. It also explains how these different categories should be delivered including how the balance between these different categories will be maintained with relevant planning applications.

## A1 Convenience 'Anchor' Foodstores

Every centre will, ideally have at least one convenience food store to act as an 'anchor' for the centre to attract people to do their food shopping. These will be commensurate to the size of the centre. This should be achievable within the District Centre by having at least two different food stores that vary in size from between 400 and 800 sqm along with other smaller scale, independent shops. In other local and neighbourhood centres, at least one convenience store should be provided in each centre, providing approximately 200 sq m and 150 sq m net floorspace, for each store in the local and neighbourhood centres, respectively.

As a minimum, a third of the floorspace available in the centre should be retained for A1 convenience food shopping. In effect these uses will act as an 'anchor' store for other centre uses. Proposals that lead to the loss of this minimum 30% threshold should be resisted to avoid undermining the centre's main purpose of meeting the everyday needs of local residents and employees.

## Smaller A1 convenience food shops and other non-food shops

The proposed convenience use capacities (outlined in Policy 10a) indicate enough capacity, in all the centres to provide for these convenience food stores along with a range of smaller, individual food and non-food shops. Based upon the popularity and success of Mill Road in Cambridge, the vision for NEC's centre is to help re-create this same appeal with a range of individual shops which will in turn help them foster their own popular identity and character.

## Other Town Centre Uses

Other town centre uses will help foster opportunities for greater social interaction, provide services to meet the day-to-day needs of local residents and workers alike as well as complementing the proposed food and non-food shops.

A range of diverse and independent retail traders will help create strong and vibrant centres. It is, however recognised that hot food takeaways and betting shops are often quite prevalent in such centres; a concentration of which can also have an adverse effect on local amenity. An issue experienced on Mill Road in Cambridge. The proximity of takeaway outlets to schools can also increase the risk of young

people regularly eating unhealthy food. This can have a significant negative impact on encouraging children to lead healthier lifestyles.

Uses typically associated with anti-social behaviour should not be allowed where they will have a detrimental effect, individually or cumulatively, on the character or amenity of the area through smell, litter, noise or car parking. For this reason, space for take-aways and betting shops will be limited in the district centre and local centres with no permissible use in the neighbourhood centre.

In the district centre, no more than 200 sq m net should be in either A5 take-away use or sui generis betting shop use. Only one of either of these uses will be permitted in a local centre and none in a neighbourhood centre. Following concerns raised by Public Health England, no A5 take-away use should be located within 400 metres, in a straight line of any school premises. This will discourage children from following unhealthy lifestyles by frequenting these types of food providers during their school routine.

It is recognised that there may be a need for some private social and healthcare facilities such as daycare centres, nurseries and dentists in local centre units, it is essential that enough provision is retained for meeting the day-to-day needs for people. The types of permitted ground floor uses should be commensurate in scale and function of the centre, to meet local need.

Local-in-scale commercial leisure uses such as cafés and restaurants will be an acceptable 'other town centre' use in NEC's centres. These are essential to ensure NEC remains a sustainable destination while not creating a destination location; one that draws large numbers of people to the area other than from immediate neighbourhoods. It is not intended for NEC to accommodate any large-scale entertainment or arts and culture leisure facilities such as a cinema complex, a ten-pin bowling facility or a large music/performance centre. These would most likely not be able to respect NEC's 'trip-budget' and have the potential to undermine other established centres already providing similar uses. As such, leisure uses involving entertainment, arts and culture will also need to comply with Policy 9: Social and Community Infrastructure, where applicable. Larger commercial leisure facilities will continue to be located within Cambridge City Centre and the Cambridge Leisure Park; recommendations will be set out in the emerging Greater Cambridge Retail and Leisure Study.

### Other neighbouring centres

Similarly, new centres should not undermine other centres or exceed the agreed 'trip budget' for Milton road. The indicated retail capacities are intended to ensure this

balance is retained, in terms of floorspace. These will encourage a range of food and non-food shops, local services and places where people can meet such as in pubs and restaurants. These will support local entrepreneurs to set-up (and hopefully) expand in flexible units. These centres will support healthy lifestyles by providing opportunities to shop on foot or on bike. It is anticipated that a diverse range of uses provided by many independent retail traders, will create centres that local people and workers will want to support.

### Small and flexible floorspaces

NEC Retail Statement indicates that commercial retail units located within local or district centres would require smaller format units of between 55-110 sqm net floorspace. Some flexibility to allow for different floorspaces is supported as it will help retailers to adapt to fluctuating demand and changing consumer trends.

Flexible floorspaces allowing for both smaller and larger units to operate will also provide greater opportunity for a range of different retail uses to establish themselves, including independent retailers. It is therefore proposed to allow different floor space configurations to allow greater flexibility for shops and other local services to set-up, operate and allow some expansion. This approach should also allow for centres to adapt to changes in consumer trends and habits in a sustainable manner. However, in order to avoid the creation of large units that would be out of character with the intended approach of attracting small, independent retailers a limit to the size of these flexible units up to 150 sq m net (GIA) will be permitted. Similarly, the merging of separate flexible, internally configurable units will not be permitted. This approach should also allow for centres to adapt to changes in consumer trends and habits in a sustainable manner.

### Permitted development rights & Article 4 Directions

The use of Article 4 Directions or equivalent will need to reflect the Permitted Development regime in operation. Their use is intended to ensure all NEC centres remain vibrant and attractive for local people and cater to their day-to-day needs. Widespread conversion of units to non-food retail use will have a significant adverse effect on their ability to fulfil their primary function. Controls may therefore be necessary to ensure the character and function of each centre is properly protected through the planning process. This will allow people to be involved in any decision to change their centres.

Uses typically associated with anti-social behaviour should not be allowed where they will have a detrimental effect, individually or cumulatively, on the character or amenity of the area through smell, litter, noise or car parking. For this reason, space

for take-aways and betting shops will be limited in the district centre and local centres with no permissible use in the neighbourhood centre.

## Temporary uses

It is also recognised that not all facilities/centres will be provided until certain development trigger points have been reached. However, it is essential that occupants from an early stage of occupation have local access to facilities that meet their day-to-day needs. A flexible approach will therefore need to be taken towards empty buildings and vacant sites, planned for alternative uses in the final plan, that could be used on a temporary basis to provide residents and office users with an alternative to having to travel to access essential day-to-day goods and services. Time limited conditions should therefore be used and linked to the opening of new centre units to ensure permitted uses are temporary. Policy 11: Meanwhile Uses provides further clarification on temporary uses.

Temporary planning permissions in buildings that would otherwise remain empty or underused will be permitted, on a temporary basis where the temporary use meets the day-to-day needs of the local community, subject to any relevant amenity issues. Time limited conditions should be used, linked to the opening of new centre units.

## Design

The policy limits the ground floor uses to those that would normally support an active centre with open frontages i.e. with large windows showing the goods and services available or a receptionist in attendance. All units should provide an active frontage, such as a window display and visual sight through to the shop floor, which is in keeping with the character of the centre.

## Relevant City/Area-wide/Regional Strategies

All forms of new retail and leisure should support relevant city/regional strategies, where possible, such as The Greater Cambridge Retail and Leisure Study.

## Draft NEC AAP 2020

### Policy 9: Social and Community Infrastructure

Policy 9 is applicable for all formal sports and leisure facilities (all leisure categories in Table 8.3 of the CLP2018), both public and private to ensure these and other relevant matters are given careful consideration.

Proposals for new formal leisure facilities often involve a much wider catchment area than their immediate neighbourhoods and can therefore have an adverse impact on similar facilities in neighbouring communities which need to be given careful consideration before approval. These also include gymnasiums.

This is also the case for ancillary formal sports and leisure facilities provided as part of an employment centre or a large, single development provided for use by their employees. It is important that these facilities are commensurate in size to the number of people expected to use them. These should also not have an adverse impact on other similar sports and leisure facilities.

Proposals for ancillary corporate sports and leisure facilities, as part of an employment centre and, or large employment development should therefore use Sport England's Sports Facility Calculator, where possible to calculate the quantum of sports provision generated by the number of people expected to be employed on-site new large-scale employment centres incorporating their own sports and leisure facilities.

## Policy 10a: Retail

Policy 10a is applicable for all proposals within a designated centre and those that may have an impact on their vibrancy and vitality outside. It has the aim of delivering the retail vision for NEC, creating attractive and vibrant centres.

The policy defines: the proposed hierarchy of centres, i.e. the district, local and neighbourhood centres; the quantum of permissible floorspace for each type of floorspace category: convenience (food shopping); comparison (non-food) shopping; and all other uses. It also explains how these different categories should be delivered including how the balance between these different categories will be maintained with relevant planning applications.

Policy 10a will permit a range of uses including estate agents, cafés, restaurants, public houses, hot food takeaways and other useful facilities or services such as a laundrette. These uses will help foster opportunities for greater social interaction, provide services to meet the day-to-day needs of local residents and workers alike as well as complementing the proposed food and non-food shops.

Uses typically associated with anti-social behaviour such as take-aways and betting shops will be limited in the district centre and local centres with no permissible use in the neighbourhood centre. In the district centre, no more than 200 sq m net should be in either A5 take-away use or sui generis betting shop use. Only one of either of these uses will be permitted in a local centre and none in a neighbourhood centre.

As specifically requested by Public Health England, no A5 take-away use should be located within 400 metres, in a straight line of any school premises.

To ensure the centres remain vibrant and attractive locations, the policy restricts ground floor uses to those will support their frequent usage and the use of active frontages to help reduce the dear of crime. The types of permitted ground floor uses should be commensurate in scale and function of the centre, to meet local need. Smaller and flexible floorspaces will be supported along with temporary uses during the construction phase to allow the maximum usage of these centres.

The widespread conversion of units to non-food retail use will have a significant adverse effect on their ability to fulfil their primary function. Controls on these conversions may therefore be necessary to ensure the character and function of each centre is properly protected through the planning process. Such controls include the use of Article 4 Directions.