

Retail Study Update 2024: Explanatory Note for the Local Plan Partial Update

Main points from the Retail Study 2024:

Overall study was to:

- Provide an update on National / Local Policy and Legislation;
- Provide an update on the baseline position including updated health checks of defined centres, a review of the role and function of centres and the retail hierarchy and updated information on out of centre retail parks, supermarkets and SG1;
- Provide a review of the baseline need analysis in the 2014 Study and a review of commitments and new facilities since the publication of 2014 and contributions that have been delivered towards identified quantitative and qualitative needs in the plan period to 2031.
- Provide a review of the current Local Plan policies including the retail hierarchy, Primary and Secondary Retail Shopping Frontages, Defined Centre Boundaries and locally set retail and leisure impact assessment thresholds
- Recommendations for Policy within the Local Plan Review.

Findings and Recommendations:

Main changes to retail since the 2014 study:

1. Limited change in convenience retail with an increase in Limited Assorted Discounters (LAD), which offer a small amount of convenience mixed with comparison retail in the town. These units are often situated in urban areas due to the 4-5 mile distance customers will travel for this type of retail.
2. Loss of comparison in the town centre, due to regeneration and online shopping. There has been an increase in the out of centre shopping area (Roaring Meg), including a new Marks and Spencer, TX Maxx, and Sports Direct planning application approval since the last study.

The headline figures are:

- Since 2014, being the base year of 2014 Retail Study, 5,535 sq m net of convenience net of additional floorspace has been delivered or is committed within Stevenage Borough.
- Since 2014, there has been a net loss of 11,476 sq m net of comparison goods floorspace within Stevenage Borough.

This gives rise to a theoretical capacity for the rest of the plan period (2024 -2031), for:

- 2,078 sq m net of convenience goods floorspace
- 16,167 sq m net of comparison goods floorspace

Main changes to National Policy:

3. The report outlines a number of changes to the NPPF and PPG since the Local Plan was adopted and this will need to be reflected within the subtext if necessary. One of the main updates which affects are policies is:
4. The NPPF 2023 has deleted the requirement for local authorities to define primary and secondary retail frontages in designated centres which was previously a requirement of bullet point 3 of paragraph 23 of the NPPF 2012.

Overall Observation

5. Whilst we conclude that overall the Town Centre has reasonable vitality and viability, the planning policy challenge is to ensure that Council's approach to growth and adaption of the Town Centre is not undermined by increased competition from out of centre retail parks, as maintaining and attracting a strong retail presence in the Town Centre is a central component of a strategy to deliver a successful mixed-use Town Centre.
6. The Neighbourhood and Local centres were also reviewed with suggestions to boundary changes to the following:
 - Bedwell Crescent Local Centre
 - Oval Local Centre
 - Roebuck Local Centre
 - Chells Manor Local Centre
 - Filey Close Neighbourhood Centre
 - Rockingham Way

Policy Recommendations for the Local Plan Review and Partial Update –

7. It is recommended that Policies TC2-TC7 are retained in the Local Plan Review and Partial Update (LPRPU) as the policies remain necessary and justified to continue to guide future development proposals. However, these policies should be updated to reflect Use Class E, and the flexibility that this Use Class provides.
8. It is important to consider not just the headline figures, but the underlying trends, the performance of Stevenage Town Centre, the migration of retailers, and the progress of the Town Centre regeneration strategy.
9. The existence of theoretical capacity is not determinative in considering planning applications for additional retail outside of centres. Instead, there is a clear requirement of national planning policy to consider the impacts arising from town centre uses planning applications, and whether proposals comply with the sequential test, in accordance with the NPPF and the Development Plan.
10. In this context, we consider the policy implications for the theoretical convenience and comparison goods capacity below.

Observations in Convenience Goods in policy:

1. Taking account of the identified quantitative needs figures from the 2014 Retail Study from 2014-2031, and accounting for changes in the supply of the floorspace in the intervening period and existing commitments, for the rest of the plan period (2024 - 2031), a capacity is identified for 2,078 sq m net of convenience goods floorspace.

2. Policy SP4 criterion D identifies a capacity for up to 7,600 sq m net of additional convenience goods floorspace with the Borough boundary. It is recommended that this policy is updated to support the provision of 2,078 sq m of floorspace
3. Criterion SP4 D criterion iii could be deleted due to the determination from North Stevenage application.
4. West Stevenage is yet to be determined and is not a commitment, Policy SP4 D criterion ii should remain.
5. South Stevenage is yet to be determined and Policy SP4 D criterion iv should therefore remain.
6. Criterion D ii and criterion D iv of SP4 will collectively continue to allocate 1,000 sq m net convenience goods, meaning the residual convenience goods capacity over the remainder of the plan period would be 1,078 sq m net. This is a relatively modest figure and it is recommended that SBC amend SP4 criterion Di to allow this residual capacity to be accommodated for extensions to existing centres in the retail hierarchy, then other stores in accordance with the sequential test.
7. Removal of TC11 – The floorspace figures for convenience goods capacity does not exist. For the 4,600 sq m net convenience store allocation at Graveley Road in accordance with Policy SP4 D criterion V, policy TC11 and policy TC12. As such, if this allocation were to be delivered there is a significant likelihood that the proposal would have a significant and adverse impact on one or more of the considerations in paragraph 94 of the NPPF. It is therefore recommended that this allocation is removed as part of the LPRPU.

Observations in Comparison Goods in policy:

8. Paragraph 90(b) of the NPPF is clear on centre first principles, and that LPA's should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed. It is clear that there is sufficient physical capacity within Stevenage Town Centre to accommodate the theoretical capacity for 16,167 sq m net of comparison goods floorspace. It is also likely that future redevelopment proposals as part of the Major Opportunity Areas will include substantial components of comparison goods floorspace.
9. It is therefore not necessary to allocate edge of centre or out of centre sites to seek to accommodate the current theoretical comparison goods capacity. Moreover, to do so, would provide a real risk of exacerbating the migration of retailers from the Town Centre and would likely have a significant adverse impact on the vitality and viability of centres and existing, committed and planned public and private investment.
10. To allow permissive Development Plan policy to enable and facilitate comparison goods schemes to be delivered in the Town Centre, as part of the wider mixed use regeneration strategy, it is recommended that Policy SP4 criterion b is amended to 'allow' for in the order of 20,000 sq m of additional comparison goods floorspace in the Town Centre, from the current baseline. It is also recommended that Policy TC12 is amended to echo this allowable comparison goods floorspace in the Town Centre Shopping Area.
11. The amendment to these policies would ensure that any future development proposals to replace the losses of comparison goods floorspace which have currently been lost from Town Centre are not in conflict with SP4(d) and TC12. These suggested amendments to the policies would not alter the sub-regional/regional role

and function of Stevenage Town Centre as a comparison goods shopping destination, but the amendments to the policies would instead just provide a permissive policy context which would allow the replacement of the comparison goods floorspace which has been lost

12. The report recommends that Policy TC13 is amended as follows:

- The title of the policy should refer to Town Centre Uses Impact Assessments and not 'retail' impact assessments, so the title of the policy is consistent with the substance of the text.
- It should be clarified in the policy that the threshold applies to proposals in excess of 300 sq m gross of floorspace as per the recommendation of the 2014 Retail Study.
- The policy should clarify that this policy also applies to planning applications which seek to vary the type of goods which can be sold from existing premises. This is important given the effects that these types of Section 73 applications outside of defined centres are having on the vitality and viability of the Town Centre.
- Criteria i and ii should be updated to reflect the updated tests in paragraph 94b of the NPPF (or any subsequent version of the NPPF).

13. Concurrently, SBC may want to consider amending the wording of criterion e of Policy SP4. Applied Planning do not consider it is appropriate for this policy to just state that applications to relax or refuse conditions will be refused. The NPPF requires that such applications should be refused if they fail to satisfy the sequential test or are likely to have significant adverse impact on one or more of the considerations in paragraph 94 of the NPPF.

14. Delete Primary and Secondary Frontages - In the case of Stevenage Town Centre, we consider it is no longer appropriate to maintain Primary and Secondary Frontage Policies. The ethos of the Town Centre regeneration strategy is to encourage a mix of uses into the Centre, to in part facilitate a evening economy. The Primary and Secondary Shopping Frontage are acting as a planning policy barrier for the Centre to respond to structural changes in shopping and leisure patterns and allowing the Centre to adapt and change. These policies in turn have the potential negatively impact on the vitality and viability of the Town Centre. It is therefore recommended that the Primary and Secondary Frontage policies for Stevenage Town Centre are deleted in the LPRPU.

Local Plan Review and Partial Update – Council's response to Study and Next Steps

The Retail Study (2024) has shown a number of areas in retail which will need review. In terms of changes required for the Partial Update, the table below addresses the recommendations and the reasons for either changing or placing within a new Local Plan.

Summary of Retail Update Study 2024				
	Recommendation to policy	Reason for change	SBC response	How the Policy will look
1	Changes to shopping area boundaries are: Bedwell Crescent The Oval Roebuck Chells Manor Filey Close Rockingham Way	From a survey conducted in the Summer 2024, small observations from the survey data led to recommendations to adapt the boundaries or change their position in the retail hierarchy.	Agreed with reasoning for changes. The changes will be submitted through DM and internal departments to confirm short term impacts and interests. It is likely to be reviewed within a new Local Plan due to this partial update not amending sites.	Boundaries to remain until the next stage of the review process, a new Local Plan is implemented.
2	Policies TC2 – TC7 to be retained.	Retained for now in the LP review. They are necessary for continued development. Update the E Class in accordance with the legislative changes.	Agree with recommendation.	No Change to Policy.
3	Convenience Goods in policy: Policy SP4 Criterion D – change the Recommended floorspace from 7,600 to 2,078	Policy SP4 criterion D identifies a capacity for up to 7,600 sq m net of additional convenience goods floorspace with the Borough boundary. It is recommended that this policy is updated to support the provision of 2,078 sq m of floorspace.	As per comments below for TC11 (point 8), changing floorspace figures at this stage affects other policies such as TC11. This will be best placed for a new Local Plan where retail can be assessed alongside other commitments. Potential for flexibility in the wording. Flexibility in subtext – some wording to show this be examined in more depth in a new local plan.	Change to subtext in red and strikethrough. 5.38 Provision is made for a major new convenience store on Graveley Road in the north of the Borough (on the existing garden centre site) to help to meet identified needs towards the middle of the plan period. This store should not be trading until 2023. In order to avoid potential adverse impacts upon the existing retail hierarchy, this site will be re-examined in a new Local Plan to ensure existing and future need for convenience has been updated to reflect changes since the Plan was adopted.
4	Convenience Goods in policy: Policy SP4 d (iii) be deleted	Criterion SP4 D criterion iii could be deleted due to the determination from North Stevenage application.	North Stevenage is still a strategic site in the Local Plan within more than one policy. For consistency within the plan, keep the policy unchanged.	No change to policy.
5	Convenience Goods in policy: Policy SP4 d (ii) remain unchanged	West Stevenage is yet to be determined and is not a commitment, Policy SP4 D criterion ii should remain.	Agree with recommendation	No change to policy.

6	Convenience Goods in policy: Policy SP4 d (iv) remain unchanged	South Stevenage is yet to be determined and Policy SP4 D criterion iv should therefore remain.	Agreed with recommendation.	No change to policy.
7	Convenience Goods in policy: Amend SP4 criterion D (i) This is to allow the residual capacity to be accommodated for extensions to existing centres in the retail hierarchy, then other stores in accordance with the sequential test.	Criterion D ii and criterion D iv of SP4 will collectively continue to allocate 1,000 sq m net convenience goods, meaning the residual convenience goods capacity over the remainder of the plan period would be 1,078 sq m net. This is a relatively modest figure and it is recommended that SBC amend SP4 criterion Di to allow this residual capacity to be accommodated for extensions to existing centres in the retail hierarchy, then other stores in accordance with the sequential test.	Agree with recommendation, but to discuss. The subtext states a level of flexibility with sequential tests. This is best for a new Local Plan due to the impact on other floorspace figures in the text and knock on effects to sites.	No change to policy.
8	Convenience Goods in policy: Removal of TC11 in the Local Plan Review	The report has found the floorspace figures for convenience goods capacity does not exist. TC11 is a site allocated for the 4,600 sq m net convenience store and 920 sq m at Graveley Road in accordance with Policy SP4 D criterion V, and policy TC11 and policy TC12. As such, if this allocation were to be delivered there is a significant likelihood that the proposal would have a significant and adverse impact on one or more of the considerations in paragraph 94 of the NPPF ¹ . It is therefore recommended that this	Due to the original legal advice received for the Local Plan Partial Update, re-allocation of sites was not considered right at this point of the Plan period. Complete removal without an alternative use would not be in the best interests of the Plan. It would be in our future interests to consider this site for other uses, such as employment or housing, within a new Local Plan when all potential uses could be assessed with equal weight of others. We are in agreement that the statistics suggest the current use for convenience (Site TC11) is undesirable, but could the policy be amended to include not only a retail impact assessment, but allow	Change has been implemented in point 3 for SP4 policies with TC11. Subtext change for TC11 includes (in red): 7.70 A site on Graveley Road, currently already in Class E(a) use as a garden centre, is identified to accommodate such a large store. The northern tip of the garden centre site lies in North Hertfordshire District: as it is outside of the Borough, this local plan cannot allocate that part of the site. Given the fact that there is no immediate need for additional floorspace, and allowing for construction and trading establishment, we will entertain a planning application for this store from 2018 onwards. This new store should not be trading before 2023. Although on the

¹ [National Planning Policy Framework - 7. Ensuring the vitality of town centres - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/national-planning-policy-framework-7-ensuring-the-vitality-of-town-centres)

		allocation is removed as part of the SBLPR.	<p>flexibility until a new Local Plan is implemented.</p> <p>Possible suggestions - Amend the wording within TC11 subtext (and possibly SP4 d(v)), to accommodate para 94 of the NPPF, and then if it fails, para 95 will refuse the application? It will protect the site until a new Local Plan can assess it within large scale assessments. Or strengthen TC13 to assist with assessments of the site for viability etc..</p>	northern edge of the Borough, this store will be well located in respect of the new neighbourhood North of Stevenage (see Policy HO3). Also, there are no alternative sites capable of accommodating a store of the required size. In order to avoid potential adverse impacts upon the existing retail demand, this site will be re-examined within a new Local Plan to ensure existing and future need for convenience has been updated to reflect changes since the Plan was adopted.
9	<p>Comparison Goods in policy:</p> <p>Amend Policy SP4 (b) and TC12</p> <p>To allow permissive Development Plan policy to enable and facilitate comparison goods schemes to be delivered in the Town Centre, as part of the wider mixed use regeneration strategy, it is recommended that Policy SP4 criterion b is amended to 'allow' for in the order of 20,000 sq m of additional comparison goods floorspace in the Town Centre, from the current baseline. It is also recommended that Policy TC12 is amended to echo this allowable comparison goods floorspace in the Town Centre Shopping Area.</p>	<p>Paragraph 90(b) of the NPPF is clear on centre first principles, and that LPA's should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed. It is clear there is sufficient physical capacity within Stevenage Town Centre to accommodate the theoretical capacity for 16,167 sq m net of comparison goods floorspace. It is also likely that future redevelopment proposals as part of the Major Opportunity Areas will include substantial components of comparison goods floorspace.</p> <p>It is therefore not necessary to allocate edge of centre or out of centre sites to seek to accommodate the current theoretical comparison goods capacity. Moreover, to do so, would provide a real risk of exacerbating the migration of retailers from the Town Centre and</p>	<p>Due to the regeneration of the town centre, and the agreed policies already in place, changing the floorspace figures could be detrimental to the regeneration schemes coming through. It is noted that the loss of floorspace is considerable, but this is in turn could be harmful to the regeneration already under way. The main recommendation is the term 'allow' for in the order of 20,000 sq m of additional comparison floorspace. So we could argue that this is an encouraged amendment rather than "you will provide" policy.</p> <p>Paragraph 90 of the NPPF now states that town centre planning policies should take a positive approach to the 'adaption' of town centres as well as supporting their growth and management. Could we suggest that the policies need to be 'adaptive' in the subtext to accommodate this flexibility? I have left it open for now to accommodate the NPPF.</p>	<p>Review sub text</p> <p>5.35 Our evidence studies show that there is a projected need for 4,700m² of additional comparison retail floorspace during the lifetime of this plan. In accordance with the retail hierarchy, and to support the regeneration of the Town Centre, this floorspace will be directed to the Town Centre. The projected significant increase in the resident population in and around the Town Centre may support some further growth in comparison floorspace: in which case, this will be directed towards the creation of additional floorspace in appropriate locations within the Stevenage Central area. In order to avoid potential adverse impacts upon the town centre, this area will be re-examined in a new Local Plan to ensure existing and future need for comparison has been updated to reflect changes since the Plan was adopted.</p>

		<p>would likely have a significant adverse impact on the vitality and viability of centres and existing, committed and planned public and private investment. The amendment to these policies would ensure that any future development proposals to replace the losses of comparison goods floorspace which have currently been lost from Town Centre are not in conflict with SP4(d) and TC12. These suggested amendments to the policies would not alter the sub-regional/regional role and function of Stevenage Town Centre as a comparison goods shopping destination, but the amendments to the policies would instead just provide a permissive policy context which would allow the replacement of the comparison goods floorspace which has been lost.</p>		
10	Amend Policy TC13	<p>The title of the policy should refer to Town Centre Uses Impact Assessments and not 'retail' impact assessments, so the title of the policy is consistent with the substance of the text.</p> <ul style="list-style-type: none"> It should be clarified in the policy that the threshold applies to proposals in excess of 300 sq m gross of floorspace as per the recommendation of the 2014 Retail Study. The policy should clarify that this policy also applies to planning applications which seek to vary the type of goods which 	<p>Agree with recommendation. Edited policy to accommodate updates.</p> <p>NPPF 94 – update for Criterion i and ii in TC13</p> <p>(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</p> <p>(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</p>	<p>Policy TC13: Town Centre Retail impact assessments</p> <p>Applications for main town centre uses should be located in the Town Centre, then in edge-of-centre locations and only if suitable sites are not available will out-of-centre sites be considered. When considering edge-of-centre and out-of-centre sites, preference will be given to accessible sites that are well connected (preferably by multi-modal means) to the Town Centre.</p> <p>An impact assessment will be required for all proposals in excess of 300m² gross of floorspace for main town centre uses</p>

		<p>can be sold from existing premises. This is important given the effects that these types of Section 73 applications outside of defined centres are having on the vitality and viability of the Town Centre.</p> <ul style="list-style-type: none"> Criteria i and ii should be updated to reflect the updated tests in paragraph 94b of the NPPF (or any subsequent version of the NPPF). 	<p>applicable to the scale and nature of the scheme).</p>	<p>outside the Town Centre This should include an assessment of:</p> <ol style="list-style-type: none"> The impact of the proposal on existing, committed and planned public and private investment in centres in the catchment area; and 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 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).The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the Town Centre and wider area, up to five years from the time that the application is made. For major schemes, where the full impact will not be realised in five years, the impact should also be assessed up to ten years from the time that the application is made. <p>Proposals will be permitted unless they fail the sequential test, or are likely to have a significant adverse impact on one or both of the above factors.</p> <p>7.76 We will follow the guidance in the NPPF (paragraphs 24 - 26) that we should apply a sequential test to planning applications for Town Centre uses (as defined in Annex 2 to the NPPF) that are</p>
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				<p>outside of the Town Centre. We have set a local threshold for an impact assessment for proposals outside the Town Centre, as the alternative would be that applications are assessed against the national threshold (of 2,500m²), which our evidence suggests could be potentially harmful to centres. All proposals in excess of 300m² gross of floorspace for main town centre uses outside the Town Centre are required to produce an impact assessment as per the recommendation of the 2014 Retail Study.</p> <p>7.77 This also applies to planning applications which seek to vary the type of goods which can be sold from existing premises. This is important given the effects that these types of Section 73 applications outside of defined centres are having on the vitality and viability of the Town Centre. Applications for main town centre uses should be located in the Town Centre (as defined above), then in edge-of-centre locations and only if suitable sites are not available will out-of-centre sites be considered. When considering edge-of-centre and out-of-centre sites, preference will be given to accessible sites that are well connected (by multi-modal means) to the Town Centre. Applicants should, in such circumstances, show flexibility on issues such as format and scale.</p>
11	Amend Policy SP4 (e)	Concurrently, SBC may want to consider amending the wording of criterion e of Policy SP4. Applied Planning do not consider it is appropriate for this policy to just state that applications to relax or refuse conditions will be refused. The NPPF requires that such applications should be refused it	<p>Agree with recommendation.</p> <p>SP4 e. Tightly regulate new out-of-centre comparison goods floorspace and refuse the relaxation or removal of conditions on the type of goods that can be sold from existing out-of-centre comparison retail units.</p>	<p>Subtext -</p> <p>5.36 In order to protect the Town Centre from adverse competition from the extensive amount of out-of-centre comparison floorspace in the Borough, it is our intention not to permit any additional comparison floorspace in out-of-centre locations nor to permit existing out-of-centre retail units to benefit from any relaxation or</p>

		they fail to satisfy the sequential test or are likely to have significant adverse impact on one or more of the considerations in paragraph 94 of the NPPF.	Subtext 5.36 updated to reflect the issues around out of centre retail.	removal of existing conditions on the type and nature of the goods that can be sold (i.e. that might permit them to compete more directly with the Town Centre). Applications must satisfy the sequential test or will be refused if they are likely to have an impact on one or more considerations in paragraph 94 of the NPPF.
12	Delete Primary and Secondary Frontages TC10.	In the case of Stevenage Town Centre, we consider it is no longer appropriate to maintain Primary and Secondary Frontage Policies. The ethos of the Town Centre regeneration strategy is to encourage a mix of uses into the Centre, to in part facilitate a evening economy. The Primary and Secondary Shopping Frontage are acting as a planning policy barrier for the Centre to respond to structural changes in shopping and leisure patterns and allowing the Centre to adapt and change. These policies in turn have the potential negatively impact on the vitality and viability of the Town Centre. It is therefore recommended that the Primary and Secondary Frontage policies for Stevenage Town Centre are deleted in the SBLPR.	Agree with recommendation.	<p>Policy TC10: High Street Primary and Secondary Frontages Within the High Street Shopping Area are defined:</p> <p>Primary and Secondary Frontages, as shown on the policies map. The following premises and areas are identified as Primary Frontages at ground-floor level: 70 – 92a High Street 35 – 75 High Street Middle Row</p> <p>The following premises and areas are identified as Secondary Frontages at ground-floor level: 26 – 68 and 94 – 132 High Street 45 – 23, 29 – 33 and 77 – 129 High Street Within the High Street Shopping Area, planning permission will be granted for Use Classes A1, A2, A3 or A4 where:</p> <p>a. At least 60% of the Primary Frontages, as measured by both units and floorspace, will remain in Class A1 use should the proposal be implemented; b. The main ground floor shopping frontage will face onto either High Street or Middle Row; and c. Any additional Use Class A3 or A4 uses will not adversely affect the character of the centre or otherwise result in a detrimental over-concentration of such uses in the vicinity of the application site.</p>

				<p>Planning permission will be granted as an exception to these criteria where there are overriding benefits to the overall vitality and viability of the High Street, having regard to whether:</p> <p>The proposal will retain an active frontage;</p> <p>The proposal will generate footfall equivalent to, or greater than, a normally acceptable A-class use in the equivalent location;</p> <p>and The unit has been unsuccessfully marketed for normally acceptable A-class uses or has remained vacant for a considerable amount of time.</p> <p>The amalgamation of existing premises to create larger units or the conversion of upper floors to provide additional floorspace in the same use class will not be permitted.</p> <p>Within the High Street Shopping Area, further Class A5 uses will not be permitted (moved to TC9).</p>
13	Amend TC9 to accommodate			<p>Policy TC9: High Street Shopping Area</p> <p>The spatial extent of the High Street Shopping Area (HSSA) is defined on the policies map.</p> <p>Within the HSSA, planning permission for development of a scale appropriate to the High Street's location in the retail hierarchy and which falls into Use Classes A1, A2, A3, A4, C1, C3, D1 or D2 will be granted where it:</p> <p>a. Would not take land or premises allocated or identified for other, specific uses;</p>

				<p>b. Would not cause harm to the significance of any designated heritage asset(s) including through harm to their setting;</p> <p>c. Does not propose Class-A uses outside of the High Street Primary Shopping Area.</p> <p>Within the High Street Shopping Area, further Takeaway uses (Sui Generis) will not be permitted.</p>
14	Amend TC8 to accommodate the primary and secondary deletion.		Amend TC8 to accommodate the removal of TC10.	<p>The spatial extent of the Town Centre Shopping Area (TCSA) is defined on the policies map. Within the TCSA, uses appropriate to a town centre will be permitted at ground floor level, including Use Classes E and C1, as well as some other sui generis uses.</p> <p>Within the TCSA, the following premises and areas are identified as Primary Frontages at ground floor level:</p> <p>27—29 (odd) Town Square; 40—50 and 66—96 (even) Queensway; 41—73 and 79—101 (odd) Queensway; 6—22 (even) The Forum; 1—11 (odd) The Forum; and The Westgate Centre.</p> <p>Within the Primary Frontages, planning permission will be granted only for Use Class E(a) (shops). Planning permission will be granted for other uses within the Primary Frontages where:</p> <p>a. The proposal is for use class E(b) (restaurants & cafes) at the following locations:</p>

				<ul style="list-style-type: none"> 50, 56, 60, 64 & 75 Queensway 2, 6 & 20, 22 The Forum and 98 & 103 Queensway; <p>b. In other locations, the benefits to the overall vitality and viability of the town centre would equal or outweigh those that would be provided by an E(a) or E(c) use in the equivalent location. This will be considered having regard to whether:</p> <ul style="list-style-type: none"> The proposal will retain an active frontage; The proposal will generate footfall equivalent to, or greater than, an E(a) or E(c) use in the equivalent location; and The unit has been unsuccessfully marketed for E(a) or E(c) use, or has remained vacant, for at least six months.
15	TC12		Small change to subtext to acknowledge a new Local Plan as the next stage of the review process.	<p>7.75 Because of the very significant quantum of out-of-centre comparison floorspace, and its adverse impact upon the vitality and viability of the Town Centre Shopping Area, the Borough Council will also resist any proposals to relax or remove conditions controlling the type of goods that can be sold from existing out-of-centre comparison units. In order to avoid potential adverse impacts upon the existing retail demand, this policy will be re-examined in a new Local Plan to ensure existing and future need for convenience has been updated to reflect changes since the Plan was adopted.</p>

