

Nottingham City

# land and planning policies

Development Plan Document  
Local Plan Part 2



Retail  
Background Paper Addendum  
September 2017

**Quick Guide to the Retail Background Paper Addendum to the Land and Planning Policies Development Plan Document Publication Version of the Land and Planning Policies (LAPP) document (Local Plan Part 2) (see [www.nottinghamcity.gov.uk/localplan](http://www.nottinghamcity.gov.uk/localplan))**

**Purpose of this document:**

The Land and Planning Policies (LAPP) document (Local Plan Part 2) forms part of the Local Plan for Nottingham City along with the [Core Strategy](#) which guides future development in Nottingham City. The Local Plan Part 2 contains development management policies against which planning applications will be determined and allocates sites for future development.

The Local Plan Part 2 is supported by a range of evidence document and background papers. This document is an addendum to the [Retail Background Paper](#) that was published in January 2016. The background paper and this addendum have informed the scope and content of Local Plan policies relating to the vitality of the City, Town, Local and District Centres and policies related to community services.

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## 1.0 Introduction

- 1.1 The Publication Version Retail Background Paper (January 2016) set out the context, need and evidence base underpinning the council's approach to uses in City, town, district and local centres and retail policies which will help to determine planning applications in out of centre locations.
- 1.2 This addendum supplements and updates the background paper relating to policies LS1, LS4, LS5, SH4, DE2 and DE3 and sets out reasons for any proposed changes to the policies. The addendum should be read alongside the Publication Version Retail Background Paper.
- 1.2 Whilst no changes have been proposed to policies SH2, SH3, SH5, SH6 and SH7 (and only changes to SH1 and SH8 to improve the clarity of the policies) this paper amplifies the justification for the approach taken in the Local Plan.

## 2.0 Policy LS1 Food and Drink Uses and Licensed Entertainment Venues Outside the City Centre

### ***National Policy Context***

- 2.1 The National Planning Policy Framework (NPPF) includes health as one of the five guiding principles of sustainable development. Paragraph 17 of the NPPF sets out the core planning principles which should underpin both plan making and decision taking. It sets out that planning should take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs. In addition, paragraph 69 sets out the important role the planning system has in promoting healthy communities.
  - 2.2 In delivering improvements to health and well being, the NPPF states that '*Local Planning Authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population*'. Planning authorities are also expected to take account of expected future changes and barriers to improving health and well being.
  - 2.3 National Planning Policy Guidance (NPPG) provides further guidance on the links between planning and health. It sets out the range of issues which could be considered through the plan-making and decision-making process in respect of health and health infrastructure including how '*opportunities for healthy lifestyles have been considered (e.g. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity,*
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*and promotes access to healthier food, high quality open spaces, green infrastructure and opportunities for play, sport and recreation)'. It also provides a definition of a healthy community as one which 'supports healthy behaviours and supports reductions in health inequalities'.*

- 2.4 The NPPG advises that in developing planning policies for health, Local Authorities should consult with Public Health leads and Clinical Commissioning Groups, taking account of key documents such as the relevant Health and Well Being Strategy and Joint Strategic Needs Assessment.

### ***Background to Policy LS1: Food and Drink Premises and Licensed Entertainment Venues Outside the City Centre***

- 2.5 Policy LS1 g) of the Publication Version seeks to control the number of hot food takeaways close to schools. Since the Publication Version was issued, calls for action on obesity have intensified, particularly from the health sector, with a growing recognition of the severe long term risks and consequences of leaving childhood obesity unchecked. Poor health in later life and the resulting economic impact and pressure on the NHS are key concerns.
- 2.6 Health professionals have called for an holistic multi agency response, focussing on preventative measures, early intervention and behavioural change. Land-use policies which seek to support and create a healthy nutritional environment form an important part of this overall strategy, alongside action to deliver and promote opportunities for sports and activity, diet/lifestyle education and engagement with the food industry over high sugar/fat ingredients, clear labelling and inclusion of healthier menu options.
- 2.7 Balanced with the above, the Council recognises the need to take a proportionate approach to any intervention which does not unnecessarily restrict economic development and business growth.

### ***Proposed Changes to Policy LS1***

- 2.8 Policy LS1 of the Publication Version sought to control the development of new hot food takeaways within 400m walking distance of all schools. The policy would not apply to locations within centres - which are the most appropriate and accessible location for food outlets.
- 2.9 In response to consultation comments and to ensure that the policy is proportionate and does not unnecessarily restrict new development, it is proposed that the policy be amended to apply to secondary schools only. Whilst the evidence suggests that obesity is problematic for both primary and secondary school age children, it is considered that primary school age children are less likely to independently visit a fast food outlet, are more likely to be accompanied to/from school and are less likely to leave the school premises at lunch time. Secondary school children, however, have greater independence, access to resources and the ability to choose to visit such outlets before/after school and at lunch times.
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- 2.10 The current policy provides flexibility for hot food takeaways within 400m walking distance of a school to be permitted where it can be demonstrated that the proposal would not have a negative impact on health and well being. This might include, for example, hours of operation which avoid the times when school children are most likely to independently visit a fast food outlet. The justification text has been amended to refer to hours of operation as a mechanism which could be considered by hot food takeaway operators to avoid adverse impacts on secondary school age children and to ensure that the policy does not unnecessarily restrict all development.

### ***Supporting Evidence for Policy LS1***

#### **Local Evidence**

##### **Nottingham City Joint Strategic Needs Assessment 2015**

- 2.11 In line with the NPPF and NPPG, the approach to Policy LS1 has been informed by direct engagement with health organisations and local health strategies and evidence such as the Joint Strategic Needs Assessment (JSNA).
- 2.12 JSNAs are local assessments of current and future health and social care needs of an area prepared jointly by the local authority and Clinical Commissioning Groups (CCGs). The aim of a JSNA is to improve the health and wellbeing of the local community and reduce inequalities for all ages. It is used to help to determine what actions local authorities, the NHS and other partners need to take to meet health and social care needs and to address the wider determinants that impact on health and wellbeing. Nottingham City has a rolling update with all chapters of the JSNA updated within a 3 year cycle.
- 2.13 Nottingham City's JSNA sets out that being overweight or obese significantly increases the risks of developing and dying from cardiovascular disease, kidney/liver disease and cancer and sets out that risk of these diseases increases as BMI increases. The risks of psychosocial problems is also increased as well as reduced life expectancy (linked to diseases listed above).
- 2.14 Obesity also has a substantial impact in terms of resources. The JSNA estimates that diseases related to obesity would cost NHS Nottingham City around £94.4m by 2015 with indirect costs due to lack of earnings from sickness and premature mortality of around £217m.
- 2.15 The JSNA also sets out that Nottingham's children have a significantly higher prevalence of obesity compared to the England average (see later information from the National Child Measurement Programme) and current trends suggest that 80% of children who are obese at age 10–14 will become obese adults. More immediate consequences for children are social and psychological, including stigmatisation, bullying, low self-esteem and depression.
- 2.16 The JSNA sets out a number of actions across a range of areas to tackle obesity including diet, working with hot food takeaways to improve nutritional quality of food, food preparation and diet education, activity programmes and school meals. The
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recommended actions also include intervention in the food environment near schools as follows:

*Take forward recommendations in the interim retail planning guidance and in relation to the NICE CVD Prevention guidance to use existing powers to regulate the opening times and number of take-away and other food outlets serving foods high in fat, sugar and salt in given areas and in particular near schools.*

### **Joint Health and Well Being Strategy – July 2016**

- 2.17 The Joint Health and Well Being Strategy (Happier Healthier Lives 2016 -2020) prepared in partnership by NHS Nottingham City Clinical Commissioning Group and Nottingham City Council sets out priorities to increase healthy life expectancy and reduce health inequalities over the next four years. The Strategy was approved in July 2016 by the Health and Well Being Board with representatives of citizens groups, voluntary and community sectors, organisations involved in directly commissioning health care and organisations whose work impacts on the health and well-being of citizens.
- 2.18 The strategy provides a clear vision for Nottingham's health and well-being and sets out a key outcome for Nottingham to have a sustainable, supporting environment which enables citizens to have good health and well-being. Creating a built environment which supports citizens to lead a healthy lifestyle is set out as a priority action. Controlling the location of hot food takeaways near secondary schools is included as a key action.
- 2.19 The emerging Diet and Nutrition Action Plan sets out more detail of how the objectives of the Health and Well Being Strategy will be achieved and includes controls on hot food takeaways near schools as a key action in influencing healthy environments and helping to reduce childhood obesity as part of an holistic approach.

### **National Child Measurement Programme**

- 2.20 In addition to the data on local levels of obesity and density of hot food takeaways set out in the Publication Version and Retail Background Paper, updated information on childhood obesity has been issued by the National Child Measurement Programme for 2014/15 (Public Health England). The Programme annually weighs and measures children in reception year and year six in maintained schools in England. The programme began in 2005 and was formerly known as the National Childhood Obesity Dataset and now provides the most robust source of childhood obesity data in England.
- 2.21 An extract of this data is set out in Table 1. This compares childhood obesity levels in Nottingham with other City and County Council areas in the East Midlands and against the regional and national average. Nottingham has the highest percentage of overweight and/or obese children across all age groups. Taking Year 6 as an example, the percentage of children in Nottingham age 10-11 classified as

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overweight or obese is 37.9%, compared to 32.4% for the East Midlands and 33.2% in England.

- 2.22 The data sets also allow comparison at District Authority level and Nottingham scores worst in the East Midlands for the percentage of children in reception class who are overweight and or obese. Nottingham has the highest percentage of overweight/obese children over all measures and ages when compared with other councils in the Nottingham Core HMA.

### **LG Inform and Public Health England**

- 2.23 LG Inform provides data on the number of hot food takeaways per head of population and indicates that Nottingham has one of the highest numbers of hot food takeaways in the country. Nottingham is within the top quartile of all English Districts with 111 hot food takeaways for every 100,000 people compared to 88 for England and 74 for the East Midlands (2011). Information from Public Health England (2016) estimates this at 115 outlets per 100,000.

### **Location of Hot Food Takeaways in Nottingham**

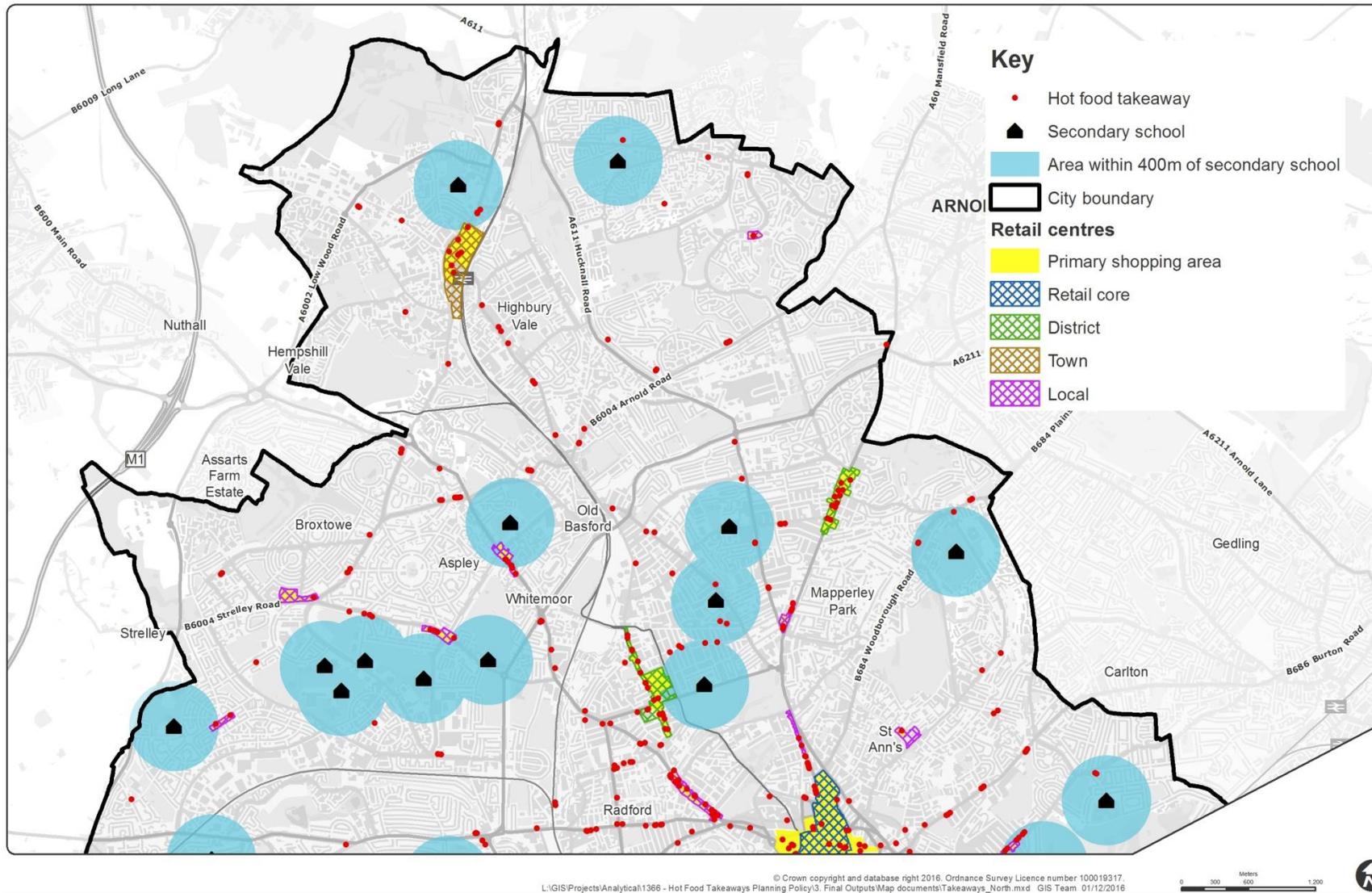
- 2.24 An assessment of the distribution of hot food takeaways in Nottingham has been undertaken alongside a review of the location of new applications approved from January 2014 to July 2016. Plans 1 and 2 illustrate the distribution of hot food takeaways in Nottingham in relation to the location of secondary schools and 'in centre' locations as defined in the Publication Version. The plans include 400m buffer zones around each secondary school providing an approximate illustration of the 400m walking distance where Policy LS1 would apply.
- 2.25 Whilst the data on Plans 1 and 2 is a snapshot in time, they demonstrate that whilst many hot food takeaways are located or are proposed to locate in 'in centre' positions or on main radial routes outside the 400m buffer zones, there are a significant number that fall within these buffer zones that could be impacting negatively on the health of secondary school children. It is considered that in implementing the policy, the approach provides a proportionate response to supporting both the Health and Well Being Strategy whilst minimising adverse impacts on business.

Indicator	Period	England	East Midlands	Derby	Derbyshire	Leicester	Leicestershire	Northamptonshire	Lincolnshire	Nottingham	Nottinghamshire	Rutland
Reception: Prevalence of underweight	2014/15	0.96	0.93	1.39	0.46	2.52	0.93	0.75	0.69	-	0.76	-
Reception: Prevalence of healthy weight	2014/15	77.2	77.4	76.7	78.0	75.6	78.7	77.0	78.1	-	78.5	-
Reception: Prevalence of overweight (including obese)	2014/15	21.9	21.7	21.9	21.6	21.8	20.3	22.2	21.2	26.7	20.7	21.8
Reception: Prevalence of obesity	2014/15	9.1	8.6	9.1	7.7	10.2	7.7	8.5	8.6	12.6	7.5	6.5
Year 6: Prevalence of underweight	2014/15	1.42	1.55	1.62	1.29	2.83	1.81	1.08	1.39	-	1.44	-
Year 6: Prevalence of healthy weight	2014/15	65.3	66.1	64.1	67.9	62.0	68.2	65.6	66.2	-	67.7	-
Year 6: Prevalence of overweight (including obese)	2014/15	33.2	32.4	34.3	30.8	35.1	30.0	33.3	32.4	37.9	31.0	24.6
Year 6: Prevalence of obesity	2014/15	19.1	18.5	20.8	17.0	21.7	16.4	19.4	18.5	22.5	17.2	13.3
Prevalence of obesity among children in Reception (aged 4-5 years), 5 years data combined	2010/11 – 14/15	9.3	8.9	8.8	8.1	10.5	7.9	9.5	9.0	11.2	8.0	7.9
Prevalence of obesity among children in Year 6 (aged 10-11 years), 5-years data combined	2010/11 – 14/15	19.1	18.3	20.0	17.7	21.0	16.0	19.5	17.5	22.2	17.3	14.6

Better
Similar
Worse
Not compared

**Plan 1**

**Hot food takeaways within 400 metres of a secondary school as at July 2016 (north Nottingham)**

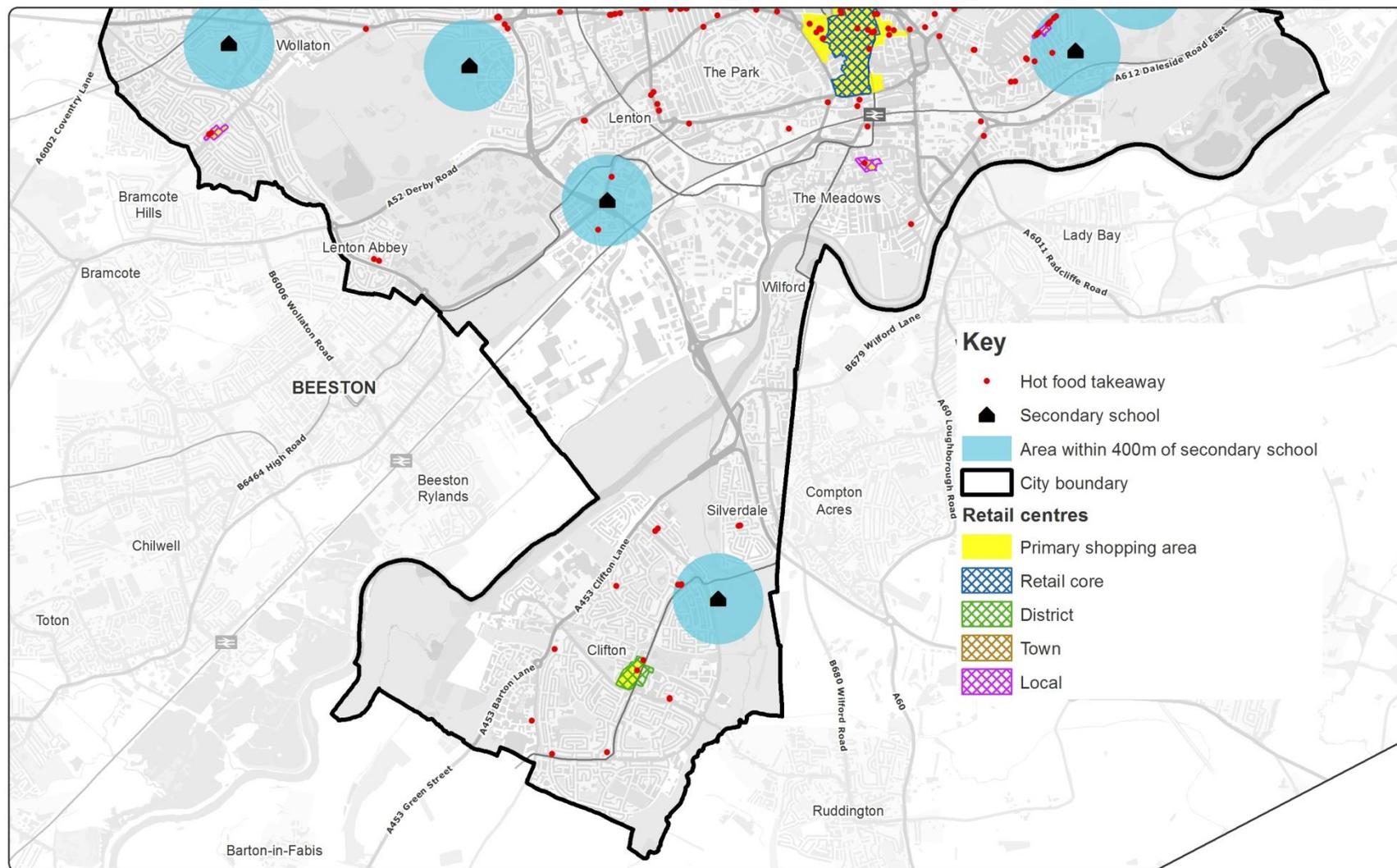


Takeaway data provided by Nottingham City Council Licencing and Food Safety teams.



## Plan 2

### Hot food takeaways within 400 metres of a secondary school as at July 2016 (south Nottingham)



© Crown copyright and database right 2016. Ordnance Survey Licence number 100019317. L:\GIS\Projects\Analytical\1366 - Hot Food Takeaways Planning Policy\3. Final Outputs\Map documents\Takeaways\_South.mxd. GIS Team 01/12/2016

0 500 600 1,200 Meters



Takeaway data provided by Nottingham City Council Licencing and Food Safety teams.



## **National Evidence**

### **Building the foundations – Tackling Obesity Through Planning and Development – Local Government Association, Public Health England, TCPA February 2016**

- 2.26 Published in February 2016, this report underlines the scale of the challenge ahead, with obesity levels having more than doubled in last 25 years and setting out “that this complex problem requires actions by multiple sectors”. The report reiterates the findings of the Foresight Report 2007 (Government Office of Science) which, as part of a range of actions, identified the need to modify the environment to reduce easy access to energy-dense food.
- 2.27 Land use planning was seen as one of a number of strands in a ‘whole-system’ approach to tackling obesity, recognising that multiple policies and actions were required to operate over a range of causal factors, and at various levels across national and local governments with the support of numerous local partners. Land use planning is regarded as an integral element to this whole-system approach.

### **Planning Healthy Weight Environments TCPA 2014**

- 2.28 The ‘Building the foundations’ report above, brings forward and supports the conclusions and recommended actions within the TCPA’s earlier report, ‘Planning Healthy Weight Environments’ which recognised that the planning system is one area where local government can have a positive impact. The report includes the control of hot food takeaways near schools as one of six elements in planning healthy weight environments.

### **LGA Tipping the Scales January 2016**

- 2.29 In developing Policy LS1, the council has reviewed a range of information including the policy approach adopted by other councils. ‘Tipping the Scales’ provides a useful overview and sets out that over 20 councils have introduced controls on fast food outlets. The report also summarises the findings of several reports evidencing the link between obesity and fast food outlets including:
- Links between elevated levels of obesity in communities with high concentrations of fast food outlets (Zenk 2009);
  - Evidence that such concentrations are highest in areas of greatest deprivation (PHE 2014);
  - Evidence that the type of food on sale nearest to schools may influence the diet of schoolchildren (Engler- Stringer, 2014; Smith, 2013).
- 2.30 The literature review also includes the following facts and figures on case studies on the link between obesity and hot food takeaways:

*“The highest density of takeaways is in areas of highest deprivation, where takeaways have risen fastest from 4.6 in 1990 to over 6.5 per 10,000 people. This is*

*a 43 per cent increase, as compared with a 30 per cent increase in the least deprived areas (Maguire et al, 2013, based on a study of Cambridgeshire)."*

*"People exposed to the highest number of takeaways are 80 per cent more likely to be obese and 20 per cent more likely to have a higher Body Mass Index than those with the lowest number of encounters (Burgoine et al, 2014, based on a study of Norfolk)."*

### **Local Evidence of Deprivation**

- 2.31 Nottingham experiences high levels of deprivation and ranks as 8<sup>th</sup> most deprived Local Authority out of 326 districts in England in the 2015 Index of Multiple Deprivation. A third of the 182 City Lower Super Output Areas (LSOAs) rank amongst the 10% most deprived areas in the country and nearly two thirds fall in the 20% most deprived. The City ranks as 19<sup>th</sup> most deprived Local Authority on the Health and Disability domain of the Indices of Deprivation, with 63 of the 182 City LSOAs ranking in the 10% most deprived areas nationally.
- 2.32 Obesity in children and women is strongly associated with deprivation. In Nottingham where there are high levels of deprivation, this is a significant contributing factor. Nottingham's children have a significantly higher prevalence of obesity compared to the England average at age 4 to 5 years (13.1% compared to 9.1%) and at age 10 to 11 years (23.1% compared to 19.1%) (Public Health England, 2015). Nottingham's child obesity prevalence in Reception was the second highest in the country in 2014/15 (after Barking and Dagenham).<sup>1</sup>

### **Hot Food Takeaways and School Opening Times**

- 2.33 Research indicates the most popular time for purchasing food is after school and many secondary school children also leave school premises at lunchtime. Furthermore, the type of food on sale nearest to schools influences the diet of school children, and the availability of "unhealthy" foodstuffs makes healthier choices more difficult to make.

### **Conclusions on Policy LS1**

- 2.34 The proposed local plan policies respond to both the NPPF and NPPG and are founded on compelling evidence derived from national and local data. The policies are directly informed by local joint strategies and engagement with public health/health experts which support intervention in the location of hot food takeaways near schools as one part of an holistic approach to improving health and well being.

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<sup>1</sup>JSNA ([http://jsna.nottinghamcity.gov.uk/insight/Strategic-Framework/Nottingham-JSNA/Behavioural-factors/Obesity\\_2016.aspx](http://jsna.nottinghamcity.gov.uk/insight/Strategic-Framework/Nottingham-JSNA/Behavioural-factors/Obesity_2016.aspx))

- 2.35 It is considered that proposed changes to Policy LS1 provide a proportionate approach, balancing health and well being objectives with the need to minimise impacts on local businesses in line with national policy.

### **3.0 Policies LS4 Public Houses outside the City Centre and/or designated as an Asset of Community Value and LS5 Community Facilities**

- 3.1 These policies provide support for appropriately located community facilities and resist their loss where possible. The policies take account of the Government's support for the designation of 'Assets of Community Value'. Policy LS4 resists the loss of Public Houses outside the City Centre or any public house which has been designated as an Asset of Community Value. Policy LS5 supports the provision of new community facilities and resists the loss of existing facilities.

- 3.2 Proposed amendments have been made to Policies LS4 and LS5 and the justification text for Policy LS4 to make reference to government changes to permitted development rights for pubs and to clarify how development proposals will be assessed and the type of evidence which will be requested to accompany planning applications. (The Town and Country Planning (General Permitted Development) (England) (Amendment) (No 2) Order 2017 withdraws permitted development rights allowing demolition of buildings used as class A4 "drinking establishments" and the conversion of pubs to class A1 retail, A2 financial and professional services and class A3 restaurants and cafes, and introduces a new permitted development right for pubs to be used for a mix of class A3 and A4 uses.) The changes to Policy LS4 will help to provide certainty for both developers and community organisations in how the policy will be applied.

#### **4.0 Policy DE2: Context and Place Making and Policy DE3: Design Principles for Development within the City Centre Primary Shopping Area**

##### ***Background***

- 4.1 Policy DE3 of the Publication Version seeks to protect and enhance the identity and character of the City Centre, promoting high quality design and architecture which makes a positive contribution to local character. The policy supports development, both in terms of buildings and public realm, which is commensurate with these aspirations and which creates safe and attractive environments.

##### ***Proposed Changes***

- 4.2 It is considered that Policy DE3 is not only applicable to the City Centre but to the development across the City. As such, it is proposed to merge the Policy with existing Policy DE2: Context and Place Making, to create a single comprehensive policy. In addition, a further amendment to Policy DE2 is proposed to ensure the policy is sufficiently robust in protecting safe and efficient access and transport arrangements.
- 4.3 These changes are considered to be in line with paragraphs 56 and 57 of the NPPF which requires local authorities to plan positively for high quality and inclusive design in all development including individual buildings, public and private spaces and wider development schemes.

## **5.0 Policies SH2 Development within Primary Frontages, SH3 Development within Secondary Frontages, SH4 Development of Main Town Centre Uses in Edge of Centre and Out of Centre Locations and SH7 Centres of Neighbourhood Importance (CONIs)**

### ***National Policy Context***

- 5.1 The NPPF requires Local Plans to define the extent of town and primary shopping frontages, make clear which uses will be permitted in such locations and promote competitive town centres that provide customer choice and a diverse retail offer.
- 5.2 The Town and Country Planning (General Permitted Development) Order 2015 introduced greater flexibility for some main town centre uses to change use class without the need for planning permission. This approach helps to support the vitality and viability of town centres by removing the need for a formal application for a change of use in cases where development is highly likely to be appropriate in a town centre retail environment.
- 5.3 In addition to greater flexibility for some uses, the Government also introduced a change to Permitted Development rights providing greater control over the location of new pay day loan and betting shops. These uses are now 'sui generis' and any new pay day loan or betting shop proposals require planning permission with no permitted change of use from other use classes.

### ***Background Policies SH2, SH3 and SH7 Relating to non A1 Uses Pay Day Loans and Betting Shops***

- 5.4 The above policies seek to ensure that centres remain vital, attractive, provide a diverse retail offer and ensure that new development does not have an adverse impact on the economic and social well being of local residents.
- 5.5 Nottingham has a diverse range of town and local centres with distinct identities and characters. As such, the policy approach seeks to assess non A1 uses in relation to specific locational circumstances taking into account, for example, the number of non A1 units, length of non A1 frontage, amount of active frontage and clustering of single uses rather than specifying proportions of non A1 frontages for town centres.

### ***Supporting Evidence for Policies SH2, SH3 and SH7***

- 5.6 The presence of some non A1 uses can have a negative effect on the overall retail character and attractiveness of a town centre and these uses may also have wider negative impacts on well being – particularly in areas of high deprivation. This is supported by a range of academic analysis. A summary of which is provided below.
- 5.7 Analysis by Landman Economics published in December 2014 concluded that betting shops are more likely to be located in areas of high deprivation and confirmed that the presence of payday loan shops on high streets is positively linked to a preponderance of betting shops. Landman used analysis carried out by Geofuture,

which showed that the areas with the highest levels of deprivation had more than twice as many betting shops compared with the lowest levels of deprivation.

- 5.8 Landman also examined mapping of pay day loan shops. The report sets out that over 34% of all betting shops are located in the most deprived quartile compared to 16% in the least deprived quartile. The number of betting shops and number of payday lenders is strongly correlated with the Index of Multiple Deprivation in local authorities.
- 5.9 The report also pointed out that losses in betting shops in the least deprived areas are a significantly higher proportion of income compared to less deprived areas – with therefore a comparatively bigger impact on household income in such areas.
- 5.10 Southwark Council, undertook an extensive literature review to inform their approach to developing an Article 4 direction to control the location of betting shops and pay day loans (prior to the Government’s change in the use classes order). This research is set out ‘Betting, borrowing and health - Health impacts of betting shops and payday loan shops in Southwark’ (March 2014)
- 5.11 The document provides a comprehensive review of scientific literature which examines the links between gambling and health which show that:
- access to gambling venues increases gambling activity and problem gambling;
  - problem gambling is linked to poor health, low level and severe mental ill health and a co-dependence on alcohol;
  - while occasional responsible sports betting may be mildly positive, the use of multiple forms of betting, particularly Fixed Odds Betting Terminals by younger adults, can be associated with significant harm to health and wellbeing;
  - problem gamblers experience the worst health outcomes and tend to live in deprived areas; and
  - areas of Britain with high densities of gambling machines have greater levels of income deprivation, more economically inactive people and a younger age profile.
- 5.12 The document also reviews the scientific literature which examines the links between debt and health which shows that:
- unmanageable payday lending is linked to poor mental health via indebtedness and financial exclusion;
  - payday loans are used to bridge payments on spending which is integral to health and wellbeing such as food, child essentials, utility bills and emergency needs however the high interest rates may perpetuate the need to borrow more;
  - there is evidence of irresponsible lending and difficulties for consumers in identifying or comparing the full cost of payday loans;
  - payday lenders flourish where mainstream financial services have withdrawn or do not offer low-value short-term loans to people who are on low incomes or who have poor credit ratings;
  - whilst payday lending may fill a void in community financial services, it does not alleviate economic hardship and it can trap users in a spiral of debt;

- debt is linked to mental health problems and a co-dependence on drugs and alcohol;
- the greater the number of debts a person has, the higher their risk of also having a mental disorder;
- access to payday lenders is an important factor in borrowing behaviour; and
- payday loan shops may provide a means to avoid more costly bank penalty charges for some people, increasing access to low interest alternatives, such as credit unions is therefore important.

5.13 In this context, it is very relevant that Nottingham has high levels of deprivation and poor health. Overall, Nottingham was ranked as the 8<sup>th</sup> most deprived local authority out of 326 local authority districts in England according to the 2015 Index of Deprivation. Within this Index there are domains relating to Income Deprivation and Health Deprivation where Nottingham ranks 14<sup>th</sup> and 19<sup>th</sup> respectively meaning it is in the 10% most deprived authorities in England. On each of these measures, Nottingham has seen its ranking worsen relative to other districts since the 2010 Index of Deprivation.

5.14 More than two thirds of the 182 Super Output Areas in Nottingham City are in the most deprived quartile nationally which were found to be the areas most likely to have large numbers of betting shops by Landman Economics (see 11.3). Nottingham also has a high proportion of Super Output Areas with very high levels of multiple deprivation with over a third of SOAs in the 10% most deprived nationally.

5.15 In the Income Domain, 59% of SOAs were in the most deprived quartile with 30% in the most deprived 10% and for Health Deprivation the proportions were 71% and 35% respectively meaning that Nottingham very high concentrations of the most deprived areas.

### ***Conclusions on Policy SH2, SH3 and SH7***

5.16 There is a strong body of evidence linking pay day loan and betting shops to areas of deprivation and ill health. Policies SH2, SH3 and SH7 provide a proportionate, case by case approach in considering the impact of non A1 uses including new pay day loan and betting shops, taking into account the number, type and distribution of existing uses and the character of the local area. The policies seek to support the vitality and viability of centres and are directly in line with the objectives of the NPPF.

## **6.0 Policy SH4 Development of Main Town Centre Uses in Edge of Centre and Out of Centre Locations**

- 6.1 This Policy sets out the Council's approach to the development of Main Town Centre uses in edge of and out of centre locations. Proposed changes have been made to this policy to ensure it is fully compliant with the NPPF in terms of the scope and application of the sequential test. The revised wording provides clarity and certainty in how the policy will be applied.

## **7.0 Site Allocations**

### ***PA16 Woodhouse Way Nottingham Business Park North***

- 7.1 This site, which is the part of the site not affected by the HS2 Safeguarding Direction, now has planning permission for 1,750 sqm of retail development, together with a pub/restaurant. The Development Principles and the schedule of retail development at Appendix 5 has been amended accordingly.

### ***PA34 Beechdale Road, Beechdale Baths***

- 7.2 Although residential development would be appropriate for this site, a wholly retail scheme would also be acceptable, and emerging proposals do not include residential development. The Development Principles have therefore been amended to reflect the acceptability of a wholly retail scheme, and although residential development remains an option, the housing figures attributed to the site in Appendix 3 of the LAPP have been deleted, and no allowance is made for housing on this site in meeting the LAPP housing provision.

### ***PA39 Carlton Road – Former Coop***

- 7.3 Due to the completion of a Lidl supermarket over the Albany Works part of the site, the site area of PA39 has been reduced to cover only the site of the remaining vacant Coop store. As this site is capable of reuse for retail, and in response to consultee comments, the Carlton Road Centre of Neighbourhood Importance has been extended to include new the site.

### ***PA58 Fairham House, Clifton***

- 7.4 The Publication Version proposed the above site for a mix of uses, including residential, retail and employment. Appendix five of the Publication Version sets out that a maximum of 1,000sqm of retail floorspace is anticipated to be delivered on the site.

- 7.5 The Fairham House site is located at the edge of Clifton District Centre. The Carter Jonas Retail Study (2015) confirmed that the District Centre was generally performing well with a low number vacancies. However, supermarket provision is limited with pedestrian access to the existing supermarket difficult.
- 7.6 The retail study anticipated that demand for new retail facilities in Clifton may increase significantly from growth in the future population associated with the proposed urban extension located immediately to the south of Clifton but within Rushcliffe Borough. The Rushcliffe Borough Council Core Strategy provides the framework for up to 3,000 homes on this site and an outline planning application is currently under consideration.
- 7.7 Whilst there are limited opportunities to facilitate the expansion and enhancement of the retail offer within the existing District Centre boundary, this edge of centre site provides an opportunity to strengthen and expand the retail offer in advance of the development of Clifton South Urban extension, helping to reinforce the centre's role and dominance in this part of the City.
- 7.8 In this context, planning permission has been granted for a primarily retail scheme for the site, which also includes an element of residential. The provision of an enhanced retail offer in this location is considered appropriate and would support policy objectives to create and sustain the existing centre. The estimated retail floorspace for this site within the Local Plan Part 2 has therefore been amended from a maximum of 1,000sqm to a range of between 1,000 and 5,750sqm and housing estimates reduced from 50 to 25 dwellings.

#### ***PA44 Derby Road – Sandfield Centre***

- 7.9 The small scale commercial uses which included retail and café uses have been removed from this allocation in order to reflect developer preferences for residential on this site and to meet the Council's need for predominantly family housing. This site has therefore been removed from Table A5.2 – Small Scale Retail.

#### ***PA48 Queens Drive and PA84 Eastpoint***

- 7.10 Site PA48 Queens Drive is now largely built out and PA84 Eastpoint is complete. Accordingly, these allocations have been from the plan (and consequently from the Appendix 5 - Retail Delivery).

#### ***PA83 Waterside – Daleside Road, Trent Lane Basin***

- 7.11 Small scale convenience retail and restaurant/café uses have been added to this site allocation in order to bring it in line with the development principles on adjacent Waterside sites PA81 and PA82 where it is envisaged that there will be small scale convenience retail to serve the local needs of the new residents.

## **8.0 Policies Map**

- 8.1 In addition to amending the Carlton Road Centre of Neighbourhood Importance (see para 7.3 above), changes have also been made to the City Centre Primary Shopping Frontages in the vicinity of the intu Victoria and Broadmarsh Centres, in response to consultee comments.

## 9.0 References

- Joint Strategic Needs Assessment 2015
- Nottingham Health and Wellbeing Strategy - Happier Healthier Lives 2016 -2020
- LG Inform
- National Child Measurement Programme
- Foresight: Tackling Obesities: Future Choices – Project Report
- Healthy Weight, Healthy Lives: A Call to Action on Obesity in England
- The Community and Consumer Food Environment and Children’s Diet: a Systematic Review Rachel Engler-Stringer 2014
- Planning Healthy Weight Environments TCPA 2014
- LGA Tipping the Scales January 2016
- Building the foundations – Tackling Obesity through planning and development – Local Government Association, Public Health England, TCPA February 2016
- The Food Environment Within the Primary School Fringe. Rachel G. Gallo, Lisa Barrett, Amelia A. Lake. British Food Journal. 2014,
- The School Fringe: What Pupils Buy and Eat from Shops Surrounding Secondary Schools. Sarah Sinclair. J T Winkler. Nutrition Policy Unit. London Metropolitan University. July 2008,
- The School Fringe: From Research to Action. Policy options within schools on the fringe (2009) Sinclair, S Winkler JT. Nutrition Policy Unit, London Metropolitan University
- Broxtowe, Gedling, Nottingham and Rushcliffe Retail Study (2015) - Carter Jonas