



# Hull Local Plan: 2016 to 2032

## Vitality and viability of centres Supplementary Planning Document 9



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## INTRODUCTION

- 1.1 This Supplementary Planning Document (SPD) supplements policies in the Hull Local Plan 2016 to 2032. It provides additional planning guidance on Policy 9 - City Centre and Policy 12 - District, Local and Neighbourhood Centres.
- 1.2 The Hull Local Plan 2016 to 2032 establishes a hierarchy of shopping centres within the city. In the hierarchy, after the city centre there are 4 district centres, 29 local centres and 29 neighbourhood centres.
- 1.3 It will set out how to apply the policies in order to protect and enhance the vibrancy and viability of Hull City Centre and the city's district, local and neighbourhood centres and to ensure that new food and drink, drink establishments and hot food takeaway outlets are directed to the most appropriate locations. This includes restricting hot food takeaway development in places where older school children and young adults can routinely access poorer food choices.
- 1.4 Beyond the city centre, Hull has a network of over 60 district, local and neighbourhood centres that act as a focus for shops, retail services, leisure opportunities and community facilities. They differ greatly in size and primary function but all enable people to access a range of shops and facilities locally. These centres help support healthy communities through access to fresh food and allow greater social interaction and support local economies by providing opportunities for smaller-scale independent businesses to open, employing and often owned by local people.
- 1.5 An important element for maintaining and increasing the vitality and vibrancy of all centres, including the city centre, involves preserving a healthy diversity of uses within them, including non -retail uses such as banks, restaurants and public houses. These are complimentary to the primary shopping function of a centre and help attract people to, and stay longer in them. There is however, a need to maintain a balance

between A1 shops and services and these non-A1 uses.

- 1.6 This SPD has been prepared to guide those who wish to change the use of a property to a non-A1 use within defined frontages of the city centre and district centres and within the primary shopping area of local centres and for those seeking to submit a planning application for a new hot food takeaway.

## **POLICY BACKGROUND**

- 2.1 The NPPF requires Local Plans to plan positively, to support designated centres to generate local employment, promote beneficial competition within and between centres and create attractive, diverse places people want to live, visit and work. In particular they should:
- recognise designated centres as the heart of their communities and pursue policies to support their viability and vitality; and
  - promote competitive centres that provide customer choice, a diverse retail offer and one which reflects the individuality of centres.
- 2.2 It also advises that the planning system has an important role to play in facilitating social interaction, creating healthy communities and supporting the reduction of health inequalities. It requires planners to consider health matters in a variety of ways, and these include creating strong community centres with active frontages where people who might not otherwise meet can mix together and improving local access to fresh food, so, potentially helping people to make healthier food choices and eat well.
- 2.3 Public Health England has the stated ambition to take action to address rising obesity levels nationwide and they recognise that planning has an important role to play in achieving this aim. Obesity and excess weight is a major public health issue for the country in the 21st Century with the number of obese adults trebling in the last twenty years (Government

Office for Science). Obesity can reduce life expectancy by between three and ten years, depending on the severity of the obesity and excess weight increases the risk of numerous health conditions, and is the leading cause of type 2 diabetes, heart disease and some cancers. Alongside these ill health issues it can reduce people's prospects in life generally, affecting their ability to get and hold work, their self-esteem and their underlying mental health.

- 2.4 National Planning Practice Guidance (NPPG) refers to how planning can help in creating healthier food environments, stating that "planning can influence the built environment to improve health and reduce obesity and excess weight in local communities. It has a role in enabling healthier environments by supporting opportunities for communities to access a wide range of healthier food production and consumption choices". The NPPG goes on to give the example that Local Plans can consider bringing forward (where supported by an evidence base) policies which limit the over-concentration of certain use classes in specific areas, when a change of use planning application is required.
- 2.5 Local planning policy for Hull is contained in the Hull Local Plan: 2016 to 2032. The relevant policy concerning the vitality and viability of the city centre are contained in Policy 9 (section 5) and the vitality and viability of district, local and neighbourhood centres, food and drinking establishments and hot food takeaways in Hull are contained in Policy 12 (sections 5 - 14) and are repeated below:

### **Policy 9**

#### **Vitality and viability of the primary shopping area**

5. The primary shopping area (of the city centre) as shown on the policies map will be the focus for A1 - A5 and related D2 leisure uses. Within the PSA a concentration of A1 shops and services should be maintained in primary frontages to promote its strong shopping role and continuing vitality and viability. Change of use within primary frontages from A1 shops to other A class uses, related high street sui-generis uses or D2 leisure uses will be

permitted where the proportion of non-A1 ground floor frontage length within individual streets, or malls within shopping centres, would not exceed 30%. Elsewhere in the PSA within secondary frontages, change of use from A1 to other A classes, related high street sui-generis uses and also D2 leisure uses will be permitted where the proportion of non-A1 ground floor frontage length within individual streets, or malls within shopping centres would not exceed 60%. Where proportions in either frontage would be exceeded, development should demonstrate that it would not undermine the vitality and viability of the centre.

## **Policy 12**

### **Vitality and viability of centres**

5. Within primary frontages of Hessle Road and Holderness Road District Centre, a high proportion of the ground floor frontage length should remain in A1 shopping use. Change of use from A1 shops to non-A1 class uses within the primary frontage will be permitted where the proportion of non-A1 ground floor frontage length would not exceed 30%. Within remaining parts of the primary shopping areas of these centres, change of use from A1 shops to non-A1 class uses will be permitted where the proportion of non-A1 ground floor frontage would not exceed 50%.
6. Within the primary frontage area of North Point District Centre, a high proportion of the ground floor frontage length should remain in A1 shopping use. Change of use from A1 shops to non-A1 class uses will be permitted where the proportion of non-A1 ground floor frontage length within the primary shopping area would not exceed 30%.
7. Within Kingswood District Centre, a mix of service and community uses will be encouraged to supplement the high proportion of A1 shopping frontage.
8. Within local centres, change of use to non-A uses will be permitted where the proportion of non-A1 ground floor frontage units within the primary shopping



area would not exceed 50% to maintain the strong A1 shopping role of these centres

9. Where stated proportions would be exceeded, development should demonstrate that it would not undermine the vitality and viability of the centre. Where current non-A uses within centres are converted to retail use, or new retail units are developed on the edge of centres, they will be considered as part of the overall mix of uses for the purpose of determining proportions.

10. In the city's neighbourhood centres, development that leads to the loss of food shops will not be supported when that loss would lead to a lack of easy access to food shops within easy walking distance of surrounding residential neighbourhoods.

11. In areas outside of defined centres, the Council will not support conversion or change of use of corner shops and local convenience stores to other uses where this would lead to a lack of easy access to food shops within easy walking distance of surrounding residential neighbourhoods.

### **Food & drink, drinking establishments and hot food takeaways**

12. Development of food and drink, drinking establishments or hot food takeaway outlets (A3 – A5) will be permitted within centres where they do not lead to an over-concentration of inactive frontages within stretches of properties that would undermine vitality and viability or would harm local amenity.

13. Development to accommodate hot food takeaway (A5 use) will not be supported in local or neighbourhood centres where a threshold of 20% of all units would be or has already been reached, to prevent over-proliferation where this could undermine objectives to promote healthy eating in the city.

14. Development to accommodate hot food takeaway (A5 use) will not normally be supported within 400m of a secondary school or sixth form college, or playing fields.

2.6 The NPPF also gives clear advice that local planning authorities should “work with public health leads and organisations to understand and take account of the health status and needs of the local population”. In Hull local strategies concerned with the health and wellbeing of residents include the Health and Wellbeing Strategy and the Joint Strategic Needs Assessment (JSNA). The vision of the Health and Wellbeing Strategy is that ‘Hull will be a city where everyone has the opportunity to live a healthier and longer life’. It identifies key targets which, if met, will fulfil this vision. These include:

- that all children and young people enjoy improved health and wellbeing; and
- that more people will be active, skilled and knowledgeable, making positive lifestyle choices and viewing good health as desirable.

Hull’s JSNA summaries the broad determinants of health and wellbeing in the city and breaks them down into over 70 topic areas. It identifies the strategic needs generated by each topic area and suggests actions needed to address them. The planning system can be linked to several topic areas including that of ‘diet’ which identifies that all relevant agencies (including planning) work together to improve access to healthy and affordable fresh food; that neighbourhoods are designed in a way that can influence the health and wellbeing of residents and increase physical activity; and that the impact on health should be considered as part of the planning process.

## **DEFINITIONS OF CENTRES, PRIMARY SHOPPING AREAS, PRIMARY AND SECONDARY FRONTAGES AND HOT FOOD TAKEAWAY OUTLETS**

Map 7.1 in the Hull Local Plan 2016 to 2032 and Appendix A of this document show the location of each centre within Hull.

3.1 The Local Plan defines the city centre, district centres, local centres and neighbourhood centres across the city. These are the preferred locations for

main town centre uses.

- 3.2 Retail uses are directed to this hierarchy of centres and the extent of the PSAs of all centres and the primary frontages of the city centre and Hessle Road and Holderness Road are shown on the Hull Local Plan 2016 to 2032 policies map, available on the Council's website. Appendix B of this document also shows the primary frontages of the Hessle Road and Holderness Road District Centres in greater detail. The primary frontages and PSAs are the areas where Local Plan policies will apply.
- 3.3 **Defining hot food takeaways** - Since April 2005 when the 1987 Town and Country Planning (Use Classes) Order was amended, A5 hot food takeaway premises have been defined as 'a business whose primary purpose is the sale of hot food for consumption off the premises'. Prior to this amendment hot food takeaways had gained planning permission under Use Class A3 (A3 premises are now defined only as 'restaurants where the primary purpose is the sale and consumption of food and light refreshment on the premises'). The distinction between an A5 and an A3 establishment can be determined by the proposed layout of the proposal, for example by the proportion of space proposed for food preparation and customer circulation and the number of tables and chairs provided for customer use.
- 3.4 It is recognised that some cafes/restaurants also offer a takeaway service to customers, so to comply with the policy and prevent takeaways services being available within 400m of secondary schools, sixth-form colleges or playing fields it will be necessary to restrict new cafes/restaurants from offering such services within any planning permission.
- 3.5 The table below gives examples of A5 and non-A5 uses although the list is not exhaustive. It should also be noted that unhealthy food can also be purchased from many non-A5 premises including shops, supermarkets and fast food restaurants and that some restaurants can have an ancillary A5 use, however, such uses and premises are not covered by this SPD.

**Table 1 - Examples of uses within and not within the A5 Use Class**

A5 premises	Non A5 premises
Fish and chip shops	Sandwich shops
Fried chicken shops	Bakeries
Pizza takeaways	Restaurants/cafes/coffee shops/teashops
Chinese, Indian or other takeaway shops	Public houses/wine bars/café bars/night cubs
Kebab shops	Ice cream parlours
Burger bars	Mobile catering vans

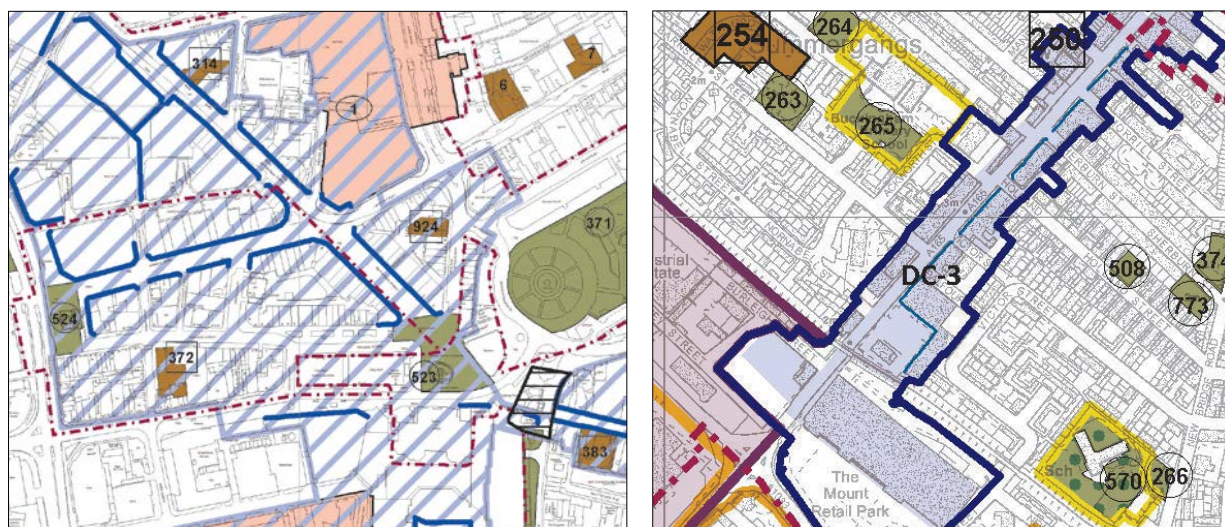
## **CALCULATING THE PROPORTION OF RETAIL USE IN PRIMARY SHOPPING AREAS AND DEFINED FRONTAGE LENGTHS OF CENTRES AND SELECTING THE POLICY THRESHOLDS**

- 4.1 To support the Hull Local Plan 2016 to 2032, the Council maintains an accurate picture of the composition and health of the city centre and the city's district, local and neighbourhood centres, which it regularly updates. Initially, the Hull Retail and District Centre Study (2013) and the Hull District, Local and Neighbourhood Centres Survey (2015) were used to inform local plan preparation and the audit contained within these documents was subsequently updated in 2017. The audits focus on a review of the Use Classes that exist within the primary and secondary frontages of the city centre and district centres and in the PSAs of local and neighbourhood centres. These health checks of centres have then been used to choose a level of threshold within which, it is generally considered appropriate to permit a change of use to a non-A1 unit, in each type of centre.
- 4.2 The policy thresholds do not set an optimum level beyond which planning applications will simply be refused, rather they set a general threshold which can be applied across centres or different streets or areas within centres, as a guide to when an applicant should provide further supporting evidence to demonstrate that their application would not undermine the vitality and viability of a centre.

- 4.3 On the Hull Local Plan Policies Map the PSA of the city centre is shown as a hatched light blue notation and in all other centres the PSAs are shown as a light blue solid notation. All properties located within the PSAs of centres are shown under these two designations and are subject to sections 6, 7, 8, and 9 of Policy 12.
- 4.4 In addition to the PSA designation, where the primary frontage contributes to the positive functioning of a centre and provides strong footfall, a distinction has been made between the primary and secondary frontages (this is applicable to the city centre and Hessle Road and Holderness Road District Centres only). This distinction reflects the retail character of certain streets or section of streets and shopping malls within PSAs, these are areas where the strong retail function needs to be protected from a potentially detrimental over-concentration of non-A1 uses, which could, ultimately, undermine the status of the whole centre for both retailers and visitors alike. The primary frontages are designated on the policies map and shown as a solid blue line along frontage of properties. Properties identified as within the primary frontage of either the city centre or the district centres are subject to Policy 9 section 5 or Policy 12 sections 5, 6, 7 or 9 depending on their location. In these centres all properties that are located outside the defined primary frontages but within the PSA are considered to have secondary frontages. See Figure 1 below for illustrative examples of these retail designations.
- 4.5 Individual primary and secondary frontage lengths for ground floor properties have been calculated in metres and measured from the OS base map. These measurements have discounted inactive frontages such as blank elevations without shopfronts, traditional public houses, and stand-alone restaurants, other non-retail uses and entrances to upper floor only premises. Where such inactive frontages arise a defined frontage length of zero is used, although wine/café bars, restaurants and public houses that have reoccupied retail units and have retained the original shop fronts have had their frontage length counted in calculations.
- 4.6 For local centres no differentiation has been made between the primary and secondary frontages so individual frontage lengths have not been measured,

instead the number of ground floor units in a particular use class has been counted. This is because properties within local centres tend to be relatively small and conform to a similar building type meaning that frontage lengths are less likely to impact on a centre's vitality and vibrancy and it is the number of units that determine how strong a centre performs.

**Figure 1** - Illustrative examples taken from the Hull Local Plan Policies Map of the PSA and the primary frontages areas of the city centre (below) and all other centres (to the right)



## APPLYING THE POLICIES

### Policy 9 – City Centre

#### Vitality and viability of the primary shopping area

5.1 The city centre has a very strong shopping core that is defined as its primary shopping area and is identified on the Hull Local Plan Policies Map (see Figure 1 above). Within the PSA, the evidence supports a clear distinction between primary and secondary frontages and the 2013/2015/2017 retail studies of the city centre identified which properties sit within these individual frontages. Based on the 2017 survey data, Table 2 below updates the previous audits and sets out how many properties are within each of the main shopping streets/shopping centres of the city centre, primary and secondary frontage lengths in these areas and what length of frontage was occupied by A1 shop units (at that moment in time).

5.2 This evidence (along with previous survey data) has been used to set the thresholds specified in Policy 9 of the Hull Local Plan. These threshold levels apply to frontage lengths along individual streets and shopping centres within the city centre, with a couple of caveats, Paragon Street includes Paragon Arcade in its measurements likewise Silver Street's measurements include Hepworth Arcade. The frontage length is allocated to an A1 use or a non-A1 use based on the current active use of each property in the first instance and then, for current vacant units, allocated a use based on what their last permitted use was. When an individual property's shopfront extends across both frontages designations (usually a corner premises with its main shopfront on the primary frontage and its side facing shopfront on the secondary frontage) threshold calculations will be counted to each specific frontage type, for example Barclays Bank on the corner of King Edward Street and Paragon Street (see Figure 2 below) although shown on the policies map as being within the primary frontage (as this frontage is where the entrance to the bank is located) has a continuous frontage extending across both frontage types, for threshold calculations it has a frontage length of 25 metres on King Edward Street (the primary frontage) and 15 metres on Paragon Street (the secondary frontage).



**Figure 2** - Illustrative example showing the division between primary and secondary frontages on properties extending across two shopping streets

**Table 2 - Frontage length and percentage of units along the main shopping streets in the primary and secondary frontages of the city centre**

Main shopping street/shopping Centre	No. of units	Length (m) of primary frontage (A1 units)	Length (m) of primary frontage (all units)	% of A1 units in the primary frontage	Length (m) of secondary frontage (A1 units)	Length (m) of secondary frontage (all units)	% of A1 units in the secondary frontage
St. Stephen's Shopping Centre	51	608	608	100%	18	128	14%
Ferensway	21	104	126	83%	92	170	54%
Jameson Street	41	254	405	65%	86	193	45%
Prospect Street	32	256	335	76%	143	208	68%
Prospect Centre	25	481	496	97%	38	62	61%
King Edward Street	43	268	437	61%	0	71	0%
Whitefriargate	27	367	452	83%	61	100	61%
Princes Quay Shopping Centre	78	296	316	94%	310	617	50%
Carr Lane	21	94	94	100%	139	179	78%
Paragon Street (incl. Paragon Arcade)	66	-	-	-	346	644	54%
Saville Street	24	-	-	-	158	227	70%
Silver Street (incl. Hepworth's Arcade)	25	-	-	-	172	283	61%
Total/average	429	2,728	3,269	83%	1,391	2,599	54%

5.3 The evidence above shows that on average less than 20% of all frontage lengths within the primary frontages are occupied by premises which are operating (or who have planning permission to operate) as non-A1 units. This reflects the strong retail role of the main shopping streets in the city centre and justifies their designation as primary frontages. It is therefore appropriate to set a relatively low indicative minimum threshold with which to determine when an applicant must demonstrate that a proposal for a change of use from an A1 use to another use will not have an adverse impact on the vitality and viability of the city centre. Within the primary frontage a threshold of 30% of non-A1 frontage length has been set by the policy beyond which an assessment would be required to justify a change of use from an A1 shop. Examples of the circumstances that could merit such a change of use



include; that the property has been vacant for a significant length of time and it would be brought back into beneficial use; that its change of use would have a beneficial effect on the character, viability and vibrancy of the street or shopping centre in question or that it can be shown that the property is no longer suitable for A1 shop use. This level of threshold still provides some flexibility beyond the current proportions of A1/non-A1 uses for further non-A1 uses to be introduced in most streets in the city centre.

- 5.4 Secondary frontages within the city centre contain a higher number of other uses, including a range of leisure uses such as cafes, restaurants and public houses. Currently an average of almost 50% of all frontage lengths within secondary frontages are occupied (or have planning permission to be occupied) by a non-A1 use. Therefore, in the secondary frontage areas of the city centre it is appropriate to set a higher threshold level than that which has been set for the primary frontage areas. Consequently, a secondary frontage threshold level of 60% for non-A1 use frontage lengths has been established in the policy, beyond which justification would be needed to allow a change of use from an A1 shop to another town centre use. This requirement again provides some flexibility beyond the current proportions, for further non-A1 uses to be introduced into the secondary frontage areas of the city centre.

## **Policy 12 – District, Local and Neighbourhood Centres**

### **Vitality and viability of centres**

- 6.1 **District centres** - District centres across Hull vary in terms of character and setting, for example Hessle Road and Holderness Road District Centres are long linear centres based along a highway, with distinct core shopping areas which function like the primary frontage area of the city centre and driving higher footfall. North Point District Centre is a 1970's purpose built shopping centre, surrounded by various community buildings, and adjoining stand-alone retail units constructed more recently to accommodate extra shops. And Kingswood District Centre has developed from a retail park with a traditional retail park layout, comprising of a parade of single storied shops

positioned around a large car park complex.

- 6.2 Based on the distinctiveness of each centre, the local plan considers it is appropriate to identify the primary and secondary frontages of Hessle Road and Holderness Road District Centres (in addition to their PSAs) in order to give extra protection to the core shopping function of certain stretches of Hessle and Holderness Road. At North Point District Centre, it is considered that evidence did not support a differentiation between the two frontage types (as the strongest shopping function was spread equally throughout the original shopping centre and stand-alone retail units) so all properties within the PSA will be considered when calculating threshold lengths. Likewise, the unique nature of Kingswood District Centre's progression from a retail park means that its existing high proportion of A1 retail units can be supplemented by other service, leisure and community uses in order to enhance its wider vitality and viability, hence Policy 12 sets no threshold for A1 uses for Kingswood.
- 6.3 The above considerations have evolved from the retail survey assessments undertaken in 2013, 2015 and 2017. Based on the survey data collected in June 2017 Table 3 below, sets out the number of retail properties in each district centre, what length of frontage is in the primary and secondary (for Hessle Road and Holderness Road centres) and what length of frontage (for all centres) was occupied by A1 shop units.
- 6.4 The evidence below shows that less than 20% of all frontage lengths within the primary frontages (or PSAs in the case of North Point and Kingswood District Centres) are located alongside properties which are operating (or who have planning permission to operate) as non-A1 units. This reflects the strong retail role of the primary frontages of Hessle Road and Holderness Road District Centres and the PSAs of the other two district centres. It is therefore appropriate to set a relatively low indicative minimum threshold with which to determine when an applicant must demonstrate that a proposal for a change of use from an A1 use to another use will not have an adverse impact on the vitality and viability of the centres. Consequently within the

primary frontages of Hessle and Holderness Road and the PSA of North Point District Centres a threshold level of 30% of non-A1 frontage length has been set by Policy 12, beyond which an assessment would be required to justify a change of use from an A1 shop. This aligns with the current proportions of non-A1 frontage lengths, although the primary frontage of Holderness Road has reached the ceiling rate for non-A1 uses.

6.5 Secondary frontages within Hessle Road and Holderness Road District Centres contain a slightly higher number of other uses, currently around 30% of all frontage lengths are occupied (or have planning permission to be occupied) by a non-A1 use. Therefore it is appropriate to set a higher threshold for secondary frontage lengths to be in non-A1 use than that, which was set for the primary frontages. A threshold of 50% of non-A1 frontage length has been established in the local plan policy, beyond which justification would be needed to allow a change from an A1 shop to another use, this requirement again provides some flexibility beyond the current proportions for further non-A1 uses to be introduced into them.

**Table 3 - Frontage length and percentage of units along the main shopping streets in the primary and secondary frontages of the district centres**

District centre name	Number of units in the PSA	Length (m) of primary frontage (A1 units)	Length (m) of primary frontage (all units)	% of A1 units in the primary frontage	Length (m) of secondary frontage (A1 units)	Length (m) of secondary frontage (all units)	% of A1 units in the secondary frontage
Hessle Road	226	530	613	86%	904	1,230	73%
Holderness Road	175	331	474	70%	788	1,232	64%
District centre name	Number of units in the PSA	Length (m) of frontage in the PSA (A1 units)	Length (m) of frontage in the PSA (all units)	% of A1 frontages in the PSA	-	-	-
North Point	69	586	668	88%	-	-	-
Kingswood	22	392	401	98%	-	-	-
Total/average	492	1,835	2,156	85%	1,692	2,462	69%

6.6 **Local centres** - there are a large number of local centres located across the city, which vary significantly in size and function, often depending on their proximity to other to centres, larger district centres (containing superstores or larger supermarkets) or out-of-centre stores or retail warehouses. Because of this variation, it is problematic to set a general threshold which to apply to all types of local centres, equally it would be too prescriptive in local plan policy to set individual thresholds for every local centre. Nevertheless, it is evident from past retail surveys that in most centres there is an identifiable split in provision between shops and non-shopping uses that would support a reasonable average threshold being applied. The percentages of A1 retail provision for all local centres are set out in Table 4 (see below), these figures are based on the 2017 survey data.

6.7 From this and previous survey data Policy 12 has set a general threshold level of 50% for A1 shop uses within local centres, as the average proportion of A1 uses across all local centres currently stands at 57%. As many centres currently have a healthy balance of A1 and non-A1 units (far below this threshold level) the policy allows for flexibility in these centres for a change of use to be permitted and for it still be acceptable. However in other centres, where this level of threshold has already been reached or exceeded a planning application of a change of use would normally require a further assessment by an applicant to demonstrate how such a loss of a shop would not have a negative impact on the vitality and viability of the centre.

**Table 4 - Retail (A1) percentage in the primary shopping areas of local centres by unit**

Local centre name	Number of units in the PSA	Total number of A1 shops in the PSA	% of A1 shops in the PSA
Anlaby Road	126	63	50%
Annandale Road	16	12	75%
Beverley Road/Cave Street	64	41	64%
Beverley Road/Cottingham Road	51	22	43%
Beverley Road/Washington Street	41	21	51%

Chanterlands Avenue	78	50	64%
Cottingham Road/Hall Road	23	10	43%
Endike Lane	31	21	68%
Gipsyville	46	31	67%
Grampian Way	12	6	50%
Grandale	17	8	47%
Greenwich Avenue	17	14	82%
Greenwood Avenue (West)	17	13	76%
Holderness Road/Faraday Street	34	15	44%
Holderness Road/Morrison's	22	10	45%
Ings Centre, Savoy Road	20	10	50%
Kingswood Village	8	6	75%
Marfleet Lane	17	11	65%
Newland Avenue	165	95	58%
Orchard Park	22	14	64%
Princes Avenue	70	32	46%
Shannon Road	18	10	56%
Southcoates Lane	32	24	75%
Spring Bank	110	56	51%
Spring Bank West	45	25	56%
Sutton Village	32	19	59%
Tweendykes/Ings Road	14	9	64%
Willerby Road	20	12	60%
<b>Total</b>	<b>1,168</b>	<b>660</b>	<b>57%</b>

### **Concentration of food & drink, drinking establishments and hot food takeaways**

7.1 The health and success of centres across Hull differs significantly. Some centres are robust and vibrant with good retailer representation and strong footfall rates, while others are showing some signs of decline, for example with higher vacancy rates and poorer environmental qualities. Within these

less vibrant centres, the re-occupation of vacant units with alternative non-shopping premises such as cafes, restaurants, bars and hot food takeaways can bring benefits by bringing properties back into use and increasing the number of people using the centre. However the over-concentration of certain uses can also detract from the primary retail function of the centre and have a detrimental effect on its general attractiveness. These negative impacts include making shopping streets less appealing to visitors due to the increased level of dead frontages (shuttered properties from restaurants or hot food takeaways for example) and the loss of local amenity relating to extended opening hours (public houses and bars for instance), increased traffic, the generation of extra on-street parking, refuse, noise and general disturbance as well as other community safety issues.

7.2 Section of Policy 12 therefore seeks to control the concentration of new food and drink, drinking establishments and hot food takeaway premises in centres. It is not intended to impose a blanket ban on the development of further A3, A4 and A5 uses within centres, rather it is guide intended to control developments in centres where there's already evidence of detrimental impacts of such uses, or there might be, should the development take place. An over-concentration of A3, A4 and A5 uses will depend on the size of a centre, the potential for numbers of such uses to impact the centres overall function or on locally identified amenity issues.

7.3 When submitting a planning application an applicant would have to demonstrate how a development of an A3, A4 and A5 use would not result in a clustering of these types of premises and if it does, how this clustering would not harm the vitality and viability of the centre it was to be located in. The applicant for such a use would also have to show how any disturbance to the local amenity of a centre would be mitigated for.

### **Over-proliferation of A5 uses within local and neighbourhood centres**

8.1 The location and concentration of hot food takeaway outlets varies around the city, within some local and neighbourhood centres shopping streets or

parades contain a relatively high number of A5 premises while others have relatively few. To give a clear picture of their presence and location in the city, information was gathered in early summer 2016 which provided a snapshot of the concentration of hot food takeaways within the city. The data gathered found that; that there was a total of 302 hot food takeaway outlets across Hull (at that time); that 245 of them were located in designated centres (14 in the city centre, 22 in district centres, 157 in local centres and 52 in the city's neighbourhood centres) and that 57 were located outside of designated retail centres.

- 8.2 In terms of density, Public Health England produced a density rate for fast food outlets in England per 100,000 of the population. This showed that across the country in 2016 there were 88 fast food outlets for every 100,000 people, with individual local authority rates ranging from 24 to 199 per hundred thousand. In 2016 Hull had a significantly higher rate of 117 outlets per 100,000 residents, notwithstanding the fact that Hull's data only counts properties operating as a hot food takeaway (i.e. with an A5 use) whereas Public Health England has a wider definition of fast food outlets which includes fast food restaurants, sandwich shops and mobile catering vans for example.
- 8.3 The over-proliferation of hot food takeaways within local and neighbourhood centres can have a detrimental effect on resident's health by restricting local access to healthier foods, by causing the displacement of smaller day-to-day shops selling fresh fruit and vegetables. The consumption of fresh fruit and vegetables, when combined with increased physical exercise, can help tackle the increasing public health issue of excess weight gain and obesity. Obesity reduces life expectancy by an average of three years and is a major contributing cause of Type 2 diabetes, heart disease and strokes (Department of Health, 2011). Evidence suggests that people who eat at least five portions of a variety of fruit and vegetables are less likely to succumb to these types of health problems.
- 8.4 Therefore Policy 12 seeks to limit the over-proliferation of hot food

takeaways in local and neighbourhood centres by not supporting planning applications for A5 uses where a threshold of 20% of all units within the PSAs has, or would be reached. Table 5 (below) is based on survey data collected in 2017 and sets out the number and percentage of A5 uses in local and neighbourhood centres. From this and previous survey data, 20% was selected as a reasonable average level of threshold for A5 premises against which further applications could be refused. The average percentage of hot food takeaway premises in relevant centres across the city currently stands at 13% for local centres and 18% for neighbourhood centres, these proportions provide some centres with the flexibility for further A5 uses to be introduced into them.

**Table 5 - Hot food takeaways (HFT) in the primary shopping areas of local and neighbourhood centres**

Local centre name	No. of HFT in centre	% of HFT	Neighbourhood centre name	No. of HFT in centre	% of HFT
Anlaby Road	17	13%	Anlaby Road/ Anlaby Park	2	22%
Annandale Road	3	19%	Anlaby Road/Calvert Lane	2	18%
Beverley Road/Cave Street	8	13%	Anlaby Road/Coltman Street	2	11%
Beverley Road/Cottingham Road	10	20%	Anlaby Road/East Ella Drive	1	11%
Beverley Road/Washington Street	7	17%	Askew Avenue	1	14%
Chanterlands Avenue	5	6%	Barham Road	4	44%
Cottingham Road/Hall Road	3	13%	Bethune Avenue	1	20%
Endike Lane	6	19%	Beverley Road/Melwood Grove	2	18%
Gipsyville	8	17%	Beverley Road/Riversdale Road	4	33%
Grampian Way	2	17%	Beverley Road/Strand Close	3	19%
Grandale	6	35%	Beverley Road/Sutton Road	1	13%
Greenwich Avenue	2	12%	Boothferry Road/Belgrave Drive	1	10%
Greenwood Avenue (West)	3	18%	Boothferry Road/North Road	1	9%
Holderness Road/Faraday Street	6	18%	Bricknell Avenue	3	43%
Holderness Road/Morrison's	6	27%	County Road South	2	22%
Ings Centre, Savoy Road	3	15%	Dalsetter Rise	1	25%
Kingswood Village	0	0%	Goodwin Parade, Walker Street	1	9%
Marfleet Lane	2	12%	Greenwood Avenue (east)	1	9%
Newland Avenue	15	9%	Holderness Road/Woodford	2	10%
Orchard Park	4	18%	Hotham Road South	1	13%



Princes Avenue	3	4%	Inglemire Lane/Hall Road	2	25%
Shannon Road	3	17%	James Reckitt Avenue	2	20%
Southcoates Lane	7	21%	Preston Road Village	0	0%
Spring Bank	11	10%	Priory Road	0	0%
Spring Bank West	7	16%	Spring Bank West/Luton Street	2	22%
Sutton Village	2	6%	The Quadrant	1	14%
Tweendykes/Ings Road	3	29%	Victoria Dock	1	20%
Wawne View*	-	-	Wawne Road/Zeals Garth	1	20%
Willerby Road	4	20%	Wold Road	4	25%
<b>Total</b>	<b>156</b>	<b>13%</b>		<b>49</b>	<b>18%</b>

\*centre planned for in the Kingswood AAP but not yet built

### **The proximity of new hot food takeaways to secondary schools, sixth-form colleges and playing fields**

9.1 Obesity is a major health concern nationally and childhood obesity has been classed by the World Health Organisation as one of the most serious challenges for the 21st Century with significant health, social and economic consequences. Evidence shows that obese children are more likely to be ill, be absent from school, experience health-related limitations and require more medical care than normal weight children. Overweight and obese children are more likely to become obese adults and have a higher risk of illness, disability and premature mortality in adulthood.

9.2 This has led to a growing body of evidence identifying the link between the number, and ease of access to, hot food takeaways and the increasing levels of obesity in society. And in particular, how the availability of calorie-rich food sold in takeaways makes it harder for individuals to maintain healthy lifestyles <sup>(1)</sup> and the hardest of all for people in the most deprived areas of the country <sup>(2)</sup>. The highest density of takeaways is also in areas of highest deprivation <sup>(3)</sup>. Hull has both a high density rate for existing A5 premises and high levels of deprivation (based on the Index of Multiple Deprivation 2015 score, Hull is the 3rd most deprived local authority in England).

9.3 Recent government initiatives have recognised that “local authorities,

through a wide range of functions are well placed to take action to combat obesity and that the planning system is one area in which local government can act”<sup>(4)</sup> although it is acknowledged that planning alone, cannot tackle the issue of weight gain in the population, for example, the planning system is limited in what it can control in relation to existing takeaways, their business models or individual consumer choice. However local planning authorities (LPAs) can influence the location of new hot food takeaway outlets and in particular follow Public Health England and NICE advice suggesting that they restrict the location of new A5 uses in certain areas, for example near schools.

9.4 Therefore Policy 12 seeks to restrict new hot food takeaways opening within 400m of all secondary schools, sixth form colleges and playing fields. The policy intends that this restriction will help reduce the ease access to A5 use premises for younger people, especially in places they regularly visit. For those submitting a planning application for a A5 use anywhere in the city, a 400m buffer will be applied around the property in question to determine whether a secondary school, sixth-form college or playing field lies within it. In the case of a playing field, there is no exact definition of what a playing field is but in terms of this the LPA will consider them to include all outdoor sports facilities and young people’s facilities (as defined in Table 12.4 - ‘Schedule of existing open space sites’ in the Hull Local Plan 2016 to 2032). This definition will include football and rugby pitches, cricket grounds, baseball and rounder’s pitches, MUGA’s and skate board parks. It should be noted that this definition of playing fields also includes playing fields at education sites (as defined in Table 12.4) although playing fields at primary schools will only be included if they are available for community use (these primary schools are listed in Table 6 below).

**Table 6 - Primary schools with playing fields available for community use**

School	School
Ainthorpe Primary School	Ings Primary School
Alderman Cogan Primary School	Longhill Primary School
Bellfield Primary School	Neasden Primary School

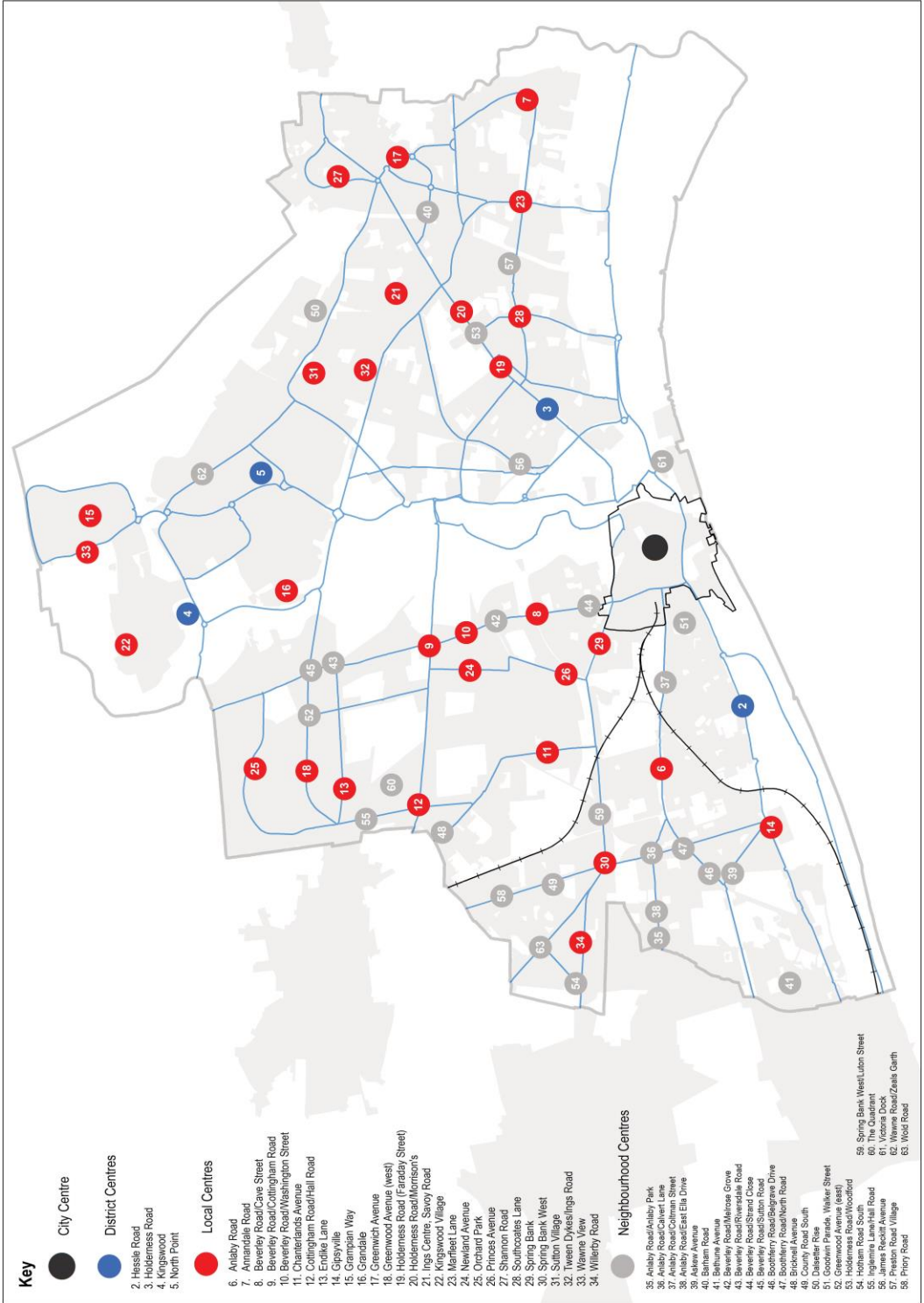
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Bricknell Primary School	Priory Primary School
Cleeve Primary School	Spring Cottage Primary School
Dorchester Primary School	St Anthony's Catholic Primary School
Griffin Primary School	St Richards VC Academy
Hall Road Academy	St Thomas More Primary School

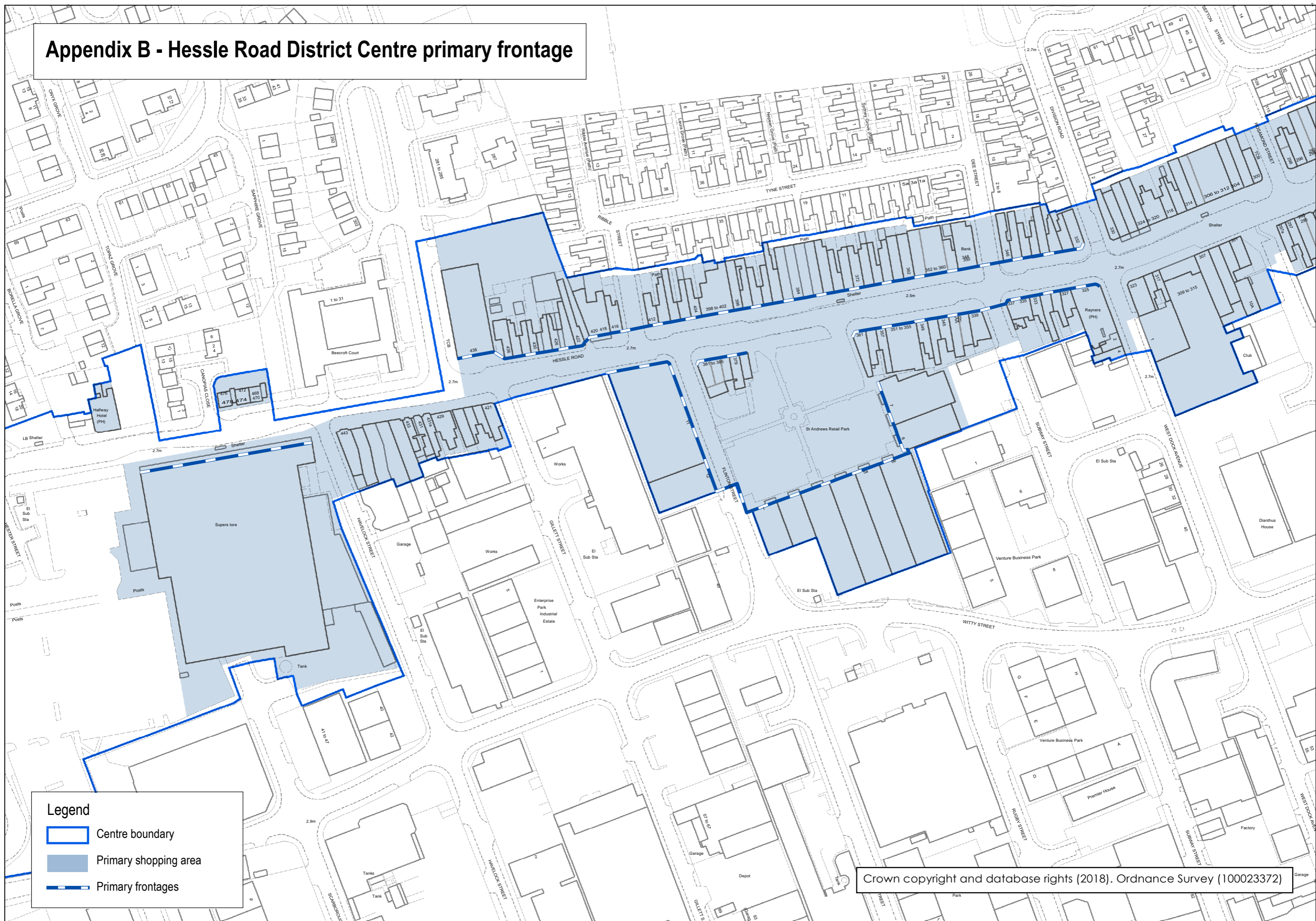
<sup>(1)</sup> HM Government - Healthy Lives, Health People: A call to action on obesity in England (2011)

<sup>(2)</sup>, <sup>(3)</sup> & <sup>(4)</sup> Local Government Association - Tipping the scales, Case studies on the use of planning powers to limit hot food takeaways




# Appendix A - Hierarchy of centres



# Appendix B - Hessele Road District Centre primary frontage

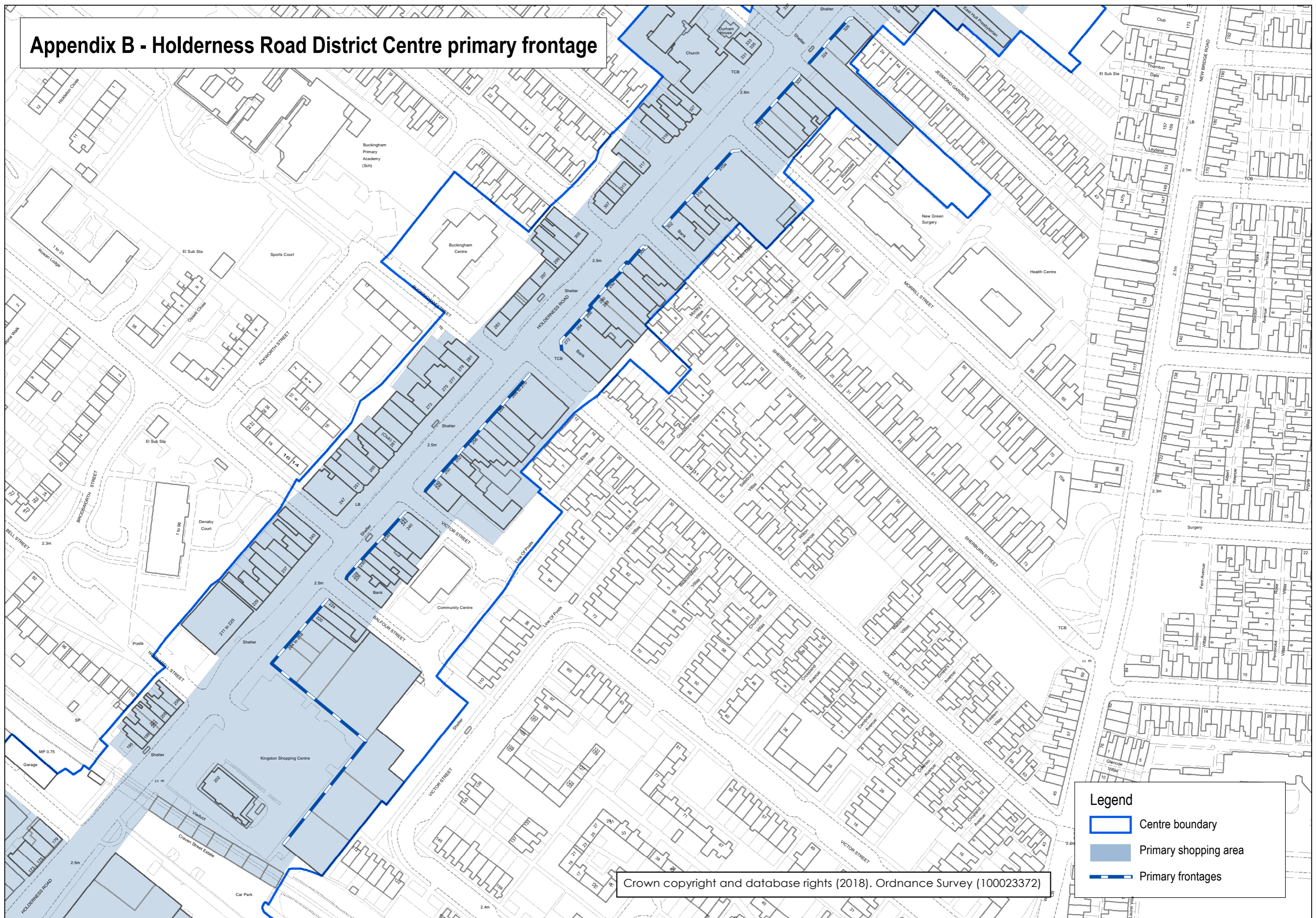


**Legend**




-  Centre boundary
-  Primary shopping area
-  Primary frontages

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# Appendix B - Holderness Road District Centre primary frontage



**Legend**

-  Centre boundary
-  Primary shopping area
-  Primary frontages

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