

Carter Jonas

Waveney District Council:

Retail and Leisure Needs Assessment 2016

FINAL REPORT

APRIL 2016

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Waveney District Council:

Retail and Leisure Needs Assessment

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CONTENTS

1	INTRODUCTION.....	1
2	PLANNING POLICY CONTEXT.....	4
	NATIONAL PLANNING POLICY FRAMEWORK (NPPF).....	4
	LOCAL PLANNING POLICY CONTEXT.....	7
3	RETAIL & TOWN CENTRE TRENDS.....	11
	RETAIL EXPENDITURE GROWTH.....	11
	SPECIAL FORMS OF TRADING AND INTERNET SHOPPING	12
	FLOORSPACE 'PRODUCTIVITY' GROWTH.....	13
	RETAIL DEVELOPMENT PIPELINE	14
	RETAILER REQUIREMENTS.....	15
	TOWN CENTRE FUTURES.....	17
4	CATCHMENT AREA & SHOPPING PATTERNS	21
	CATCHMENT AREA	21
	SHOPPING PATTERNS	21
5	LOWESTOFT TOWN CENTRE: HEALTH CHECK UPDATE	28
	METHODOLOGY	28
	CONTEXT	29
	RETAIL COMPOSITION AND DIVERSITY	30
	VACANCY LEVELS	35
	RETAILER REQUIREMENTS.....	36
	PRIME ZONE A RENTS	36
	ACCESSIBILITY & PEDESTRIAN FLOWS	37
	CUSTOMER VIEWS AND PERCEPTIONS.....	38
	ENVIRONMENTAL QUALITY	39
	OUT-OF-CENTRE PROVISION.....	40
	NEW INVESTMENT AND POTENTIAL DEVELOPMENT	41
	SUMMARY	41
6	BECCLES TOWN CENTRE: HEALTH CHECK.....	43
	RETAIL COMPOSITION AND DIVERSITY	45
	VACANCY LEVELS	46

	ACCESSIBILITY & PEDESTRIAN FLOWS	47
	CUSTOMER VIEWS AND PERCEPTIONS.....	48
	ENVIRONMENTAL QUALITY	49
	NEW INVESTMENT AND DEVELOPMENT	49
	OUT OF CENTRE	50
	SUMMARY	50
7	BUNGAY TOWN CENTRE: HEALTH CHECK	52
	RETAIL COMPOSITION AND DIVERSITY	53
	VACANCY LEVELS	55
	RETAILER REQUIREMENTS.....	55
	ACCESSIBILITY & PEDESTRIAN FLOWS	55
	CUSTOMER VIEWS AND PERCEPTIONS.....	56
	ENVIRONMENTAL QUALITY	58
	NEW INVESTMENT AND POTENTIAL DEVELOPMENT	58
	OUT OF CENTRE	58
	SUMMARY	59
8	HALESWORTH TOWN CENTRE: HEALTH CHECK	60
	RETAIL COMPOSITION AND DIVERSITY	61
	VACANCY LEVELS	62
	ACCESSIBILITY & PEDESTRIAN FLOWS	63
	CUSTOMER VIEWS AND PERCEPTIONS.....	63
	ENVIRONMENTAL QUALITY	65
	NEW INVESTMENT AND POTENTIAL DEVELOPMENT	65
	OUT OF CENTRE	65
	SUMMARY	66
9	SOUTHWOLD TOWN CENTRE: HEALTH CHECK	67
	RETAIL COMPOSITION AND DIVERSITY	68
	VACANCY LEVELS	70
	RETAILER REQUIREMENTS.....	70
	ACCESSIBILITY & PEDESTRIAN FLOWS	71
	CUSTOMER VIEWS AND PERCEPTIONS.....	72

	ENVIRONMENTAL QUALITY	73
	NEW INVESTMENT AND POTENTIAL DEVELOPMENT	74
	OUT OF CENTRE	74
	SUMMARY	74
10	DISTRICT & LOCAL CENTRES: HEALTH CHECK	76
	DISTRICT CENTRES.....	76
	LOCAL CENTRES	77
11	QUANTITATIVE RETAIL NEED ASSESSMENT.....	80
	THE CREATE MODEL: KEY ASSUMPTIONS & FORECASTS.....	80
	POPULATION AND EXPENDITURE FORECASTS.....	81
	MARKET SHARE ANALYSIS	83
	'INFLOW' AND BASE YEAR TURNOVER ESTIMATES.....	84
	RETAIL COMMITMENTS.....	85
	WAVENEY DISTRICT: CAPACITY FORECASTS.....	85
	SUMMARY	89
12	COMMERCIAL LEISURE NEED/'GAP' ASSESSMENT	91
	CINEMA PROVISION AND POTENTIAL NEED.....	91
	FOOD AND BEVERAGE NEED.....	93
	HEALTH & FITNESS NEED.....	97
	BINGO & GAMBLING NEEDS.....	99
	TEN-PIN BOWLING	101
	CULTURAL ACTIVITIES.....	102
	HOTEL PROVISION	102
	SUMMARY	103
13	ACCOMMODATING IDENTIFIED NEEDS.....	105
	POLICY CONTEXT	105
	POTENTIAL DEVELOPMENT OPPORTUNITY SITES	106
14	DEFINITION OF SHOPPING FRONTAGES & BOUNDARIES	112
	POLICY CONTEXT	112
	DEFINITIONS OF FRONTAGES, PSA AND TOWN CENTRE BOUNDARIES	113
15	DEFINITION OF IMPACT THRESHOLDS.....	120

16	EXECUTIVE SUMMARY AND KEY FINDINGS	122
	DISTRICT-WIDE RETAIL AND LEISURE NEEDS	122
	MEETING NEEDS IN THE DISTRICTS' TOWN CENTRES	123
17	GLOSSARY	134
	APPENDIX 1: STUDY AREA	136
	APPENDIX 2: HOUSEHOLD SURVEY METHODOLOGY	137
	APPENDIX 3: HOUSEHOLD SURVEY RESULTS (WEIGHTED)	137
	APPENDIX 4: CONVENIENCE GOODS - MARKET SHARES (incl SFT)	137
	APPENDIX 5: COMPARISON GOODS - MARKET SHARES (incl SFT)	137
	APPENDIX 6: HEALTH CHECK PRO FORMAS – MAIN TOWN CENTRES	137
	APPENDIX 7: HEALTH CHECK PRO FORMAS – DISTRICT & LOCAL CENTRES	137
	APPENDIX 8: CONVENIENCE GOODS CAPACITY ASSESSMENT	137
	APPENDIX 9: COMPARISON GOODS CAPACITY ASSESSMENT	137
	APPENDIX 10: DEVELOPMENT OPPORTUNITY SITES – PLANS	137
	APPENDIX 11: FRONTAGES AND BOUNDARIES – TABLES & PLANS.....	137

1 INTRODUCTION

- 1.1 Waveney District Council (the 'Council') is undertaking a review of its Local Plan (formerly known as the Local Development Framework), which will cover the period up to 2036. As part of this review Carter Jonas ('CJ') was commissioned by the Council in 2015 to carry out a *Retail and Leisure Needs Assessment* (RLNA) to help inform plan-making and decision-taking across the District
- 1.2 Waveney District Council borders Great Yarmouth, Suffolk Coastal, Mid Suffolk and South Norfolk local authorities, and had a total population of 115,356 in 2011 according to the last Census. Lowestoft is the largest retail centre within the District and provides a wide range of shops and services for its resident catchment population and shoppers/visitors from across the District and elsewhere. Beccles is the second largest town in the District, with a population of 10,123 in 2011, and has a relatively good range of shops and services. Bungay (population of 5,127) and Halesworth (population of 4,726) are smaller centres with more limited catchments. The other main centre in the District is Southwold. Although it is smaller than the other centres, with a 2011 population of under 2,000, it is a popular holiday resort and tourist destination and this is reflected by its wide-ranging retail and leisure offer.
- 1.3 Against this background this study has been prepared in the context of current national and development plan policy guidance, as well as other key material considerations; principally the National Planning Policy Framework (NPPF) published in March 2012. Where relevant the study also draws on advice set out in the National Planning Practice Guidance (PPG), published in March 2014. Both policy and guidance places significant weight on the development of positive plan-led visions and strategies to help ensure the vitality of town centres.
- 1.4 This study will address a number of specific requirements in accordance with the Council's brief, including:
- Defining a study (catchment) area that includes the District and wider area as the framework for the quantitative and qualitative assessment of retail and leisure needs.
 - Undertaking a telephone survey of local households to help ascertain shopping patterns and leisure preferences across the defined study area;
 - Assessing the quantitative and qualitative need for new convenience and comparison retail floorspace and leisure uses;
 - Assessing the need for other town centre uses over the Plan Period, utilising evidence from existing and emerging studies;
 - Identifying potential sites for future development to meet the identified needs;
 - Conducting a health check on the vitality and viability of Waveney's five town centres and a high level review of the smaller district and local centres;

- Providing recommendations on the role and function of the District's town centres, the relationship between them and competing centres, and the potential future changes;
 - Defining the boundaries of town, district and local centres as well as the primary and secondary shopping frontages in these centres; and
 - Informing the creation of retail policies in the Local Plan review to meet the requirements of paragraph 23 of the National Planning Policy Framework.
- 1.5 For the purpose of this study the assessment of the need (or 'capacity') for new retail (convenience and comparison goods) floorspace has been carried out at the strategic District-wide level up to 2032. This is the latest year at which population projections and expenditure forecasts are available, and forecast beyond this design year would be meaningless. This assessment will help the Council plan for the scale, type, location and phasing of new retail development over the short term (2016 to 2021), medium terms (2022 to 2026) and longer term (2027 to 2032).
- 1.6 The study area defined for the purpose of this retail assessment principally covers Waveney District, but also extends to a slightly wider area incorporating neighbouring local planning authorities. This area has been further sub-divided into eight zones that broadly reflect the prime catchments of the Districts' five main centres (see **Appendix 1**). The defined study area and zones provide the framework for the new telephone interview survey of some 1,000 households conducted by NEMS Market Research (NEMS). The survey approach adopted by NEMS is explained in some detail in **Appendix 2**, along with the questionnaire. The full (weighted) survey results are set out in **Appendix 3**.
- 1.7 This survey provides the most up-to-date and robust evidence on shopping patterns and leisure preferences within the study area. The updated market share assessments for convenience and comparison goods expenditure are set out in **Appendix 4** and **Appendix 5** respectively¹.
- 1.8 This updated survey evidence has also informed the high level health check assessments for the main centres. These health checks are principally informed by the *Retail Factsheets* prepared by the Council for each centre, and supplemented by the audits of the main town, district and local centres carried out by Carter Jonas in November 2015 (see **Appendix 6**).
- 1.9 For ease of reference this report is structured as follows:
- **Section 2** reviews the national, regional and local planning policy context material to retail planning and town centres.

¹ The markets shares include Special Forms of Trading (SFT), which comprises all non-store retail sales made via the internet, mail order, stalls and markets, door-to-door and telephone sales. Please note that the market shares used for the purpose of the retail capacity assessment strip out SFT in accordance with standard approaches.

- **Section 3** highlights some of the key trends that are driving the dynamic changes in the retail sector at the national and local level, and how this has shaped (and is likely to shape) the urban and retail landscape both nationally and locally over the short, medium and longer term.
 - **Section 4** describes the results of the market share analysis for convenience and comparison goods retailing across the study area and sub-zones, as derived from the results of the household telephone interview survey.
 - **Sections 5-10** set out the health check assessments for the District's five main town centres, as well as the district and local centres, carried out in accordance with the guidance set out in the PPG. This analysis is supplemented by the health check pro formas for all the main centres set out in Appendices 6 and 7.
 - **Section 11** sets out the retail (economic) capacity assessments for comparison and convenience goods retailing for Waveney District and the main centres based on our in-house **CREAT**[®] Model. The full tabulations are set out in **Appendix 8** for convenience goods and **Appendix 9** for comparison goods.
 - **Section 12** sets out the findings of the commercial leisure needs and 'gap' assessment for the main commercial leisure uses in accordance with the NPPF, including food and beverage, cinema and health and fitness provision. This section also provides an overview of current provision and identifies any potential 'gaps'.
 - **Section 13** provides a high level review of the potential for development opportunity sites identified in and on the edge of the main town centres to accommodate the forecast quantitative and qualitative needs in retail and leisure provision over the plan period. The site plans provided by the local planning authority are set out in **Appendix 10**.
 - **Sections 14-15** draw together the key findings of the household survey, health checks, need/capacity assessments, and other strands of research to provide robust advice on the potential definition of primary and secondary shopping frontages in the main town centres, and a locally-set retail impact threshold in accordance with the NPPF. The plans showing frontages, primary shopping areas and boundaries for each main town centre are provided in **Appendix 11**.
 - Finally, **Section 16** provides a brief summary of the key findings of the study.
- 1.10 It is important to state at the outset that, in our experience, capacity forecasts beyond a five year time period should be interpreted with caution as they are subject to increasing margins of error. Thus, although this study provides the robust evidence base required to help inform plan-making, the forecasts should be constantly monitored and updated to take into account any significant new retail development and changes in the retail expenditure and population growth forecasts over time, as well as any potential impacts arising from other key trends in the retail and commercial leisure sectors (such as, for example, the growth in internet shopping).

2 PLANNING POLICY CONTEXT

- 2.1 This section provides a high level overview of the relevant national and local development plan planning policy pertaining to retail and town centre uses, along with other material considerations.

NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

- 2.2 The NPPF was published in March 2012 and sets out the planning policies for England and how these are expected to be applied. It reinforces the importance of up-to-date plans and strengthens local decision making. The NPPF must be taken into account in the preparation of Local Plans and Neighbourhood Plans. At the heart of the NPPF is a **presumption in favour of sustainable development**², which is seen as “*a golden thread running through both plan-making and decision-taking*” (paragraph 14). The NPPF (paragraph 14) sets out the Government’s view of what sustainable development means in practice for both plan-making and decision-taking at the local level.
- 2.3 For plan-making the Framework states that local planning authorities should positively seek opportunities to meet the development needs of their area. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The Framework (paragraph 15) states that policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that “*...it is clear that development which is sustainable can be approved without delay*”.
- 2.4 The NPPF (paragraph 17) sets out twelve **core planning principles** that underpin both plan-making and decision-taking. Amongst other objectives these principles confirm that planning should be genuinely plan-led; proactively drive and support sustainable economic development to deliver thriving local places; promote mixed use developments; focus significant development in locations which are or can be made sustainable; and deliver sufficient community and cultural facilities and services to meet local needs.
- 2.5 The Framework (paragraph 150) emphasises that **Local Plans** are “*...the key to delivering sustainable development that reflects the vision and aspirations of local communities*”. They should be “*aspirational but realistic*” and should set out the opportunities for development and clear policies on “*...what will or will not be permitted and where*” (paragraph 154). Only those policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Any additional DPDs should only be used where clearly justified (paragraph 153).

² Sustainable development is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

- 2.6 The NPPF (paragraph 156) requires strategic priorities for the area covered by the Local Plan to deliver the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; and the provision of health, security, community and cultural infrastructure and other local facilities; etc. Crucially the NPPF (paragraph 157) indicates that Local Plans should, amongst other key requirements: plan positively for the development and infrastructure required in the area; be drawn up over an appropriate time scale (preferably 15 years), take account of longer term requirements and be kept up to date; and allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate.
- 2.7 In terms of the **evidence-based approach to planning**, the Framework states LPAs should ensure that the Local Plan is based on “...adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area” (paragraph 158). Furthermore the assessment of, and strategies for housing, employment and other uses should be integrated, and take full account of relevant market and economic signals. LPAs should use this evidence base to assess the needs for land or floorspace for economic development, including for retail and leisure development; examine the role and function of town centres and the relationship between them; assess the capacity of existing centres to accommodate new town centre development; and identify locations of deprivation which may benefit from planned remedial action.
- 2.8 The NPPF is clear that pursuing sustainable development requires “...*careful attention to viability and costs in plan-making and decision-taking*” (paragraph 173). Plans should be deliverable and, in this context, sites and the scale of development identified in the plan should “...*not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened*” (paragraph 173).
- 2.9 The Framework (paragraphs 18-149) sets out thirteen key ‘principles’ for **delivering sustainable development**, including building a strong, competitive economy; ensuring the vitality of town centres; promoting sustainable transport; delivering a wide choice of high quality homes; requiring good design; promoting healthy communities; protecting Green Belt land; and conserving and enhancing the natural and historic environment.
- 2.10 In terms of ‘**ensuring the vitality of town centres**’ the NPPF (paragraph 23) states that planning policies should be positive and promote competitive town centre³ environments, as well as setting out policies for the management and growth of centres over the plan period. When drawing up Local Plans, LPAs should:

³ The NPPF (Annex 2) states that references to town centres or centres apply to city centres, town centres, district centres and local centres, but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
- define a network and hierarchy of centres;
- define the extent of town centres and primary shopping areas⁴, based on a clear definition of primary and secondary frontages⁵ in designated centres, and set policies that make clear which uses will be permitted in such locations;
- promote competitive town centres that provide customer choice and a diverse retail offer;
- retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
- allocate a range of suitable sites to meet the scale and type of retail and leisure development needed in town centres;
- ensure that the needs for retail and leisure are “*met in full*” and “*not compromised by limited site availability*”. Assessments should therefore be undertaken of the need to expand town centres to ensure a sufficient supply of suitable sites;
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
- recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and
- where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.

2.11 When assessing and determining applications for main town centre uses⁶ that are not in an existing centre and not in accordance with an up-to-date Local Plan, LPAs should:

- Apply a **sequential test**⁷, which requires applications for main town centre uses to be located in town centres first, then in edge-of-centre locations and only consider out-of-centre locations

⁴ Primary shopping area is defined by the NPPF (Annex 2) as the defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

⁵ The NPPF (Annex 2) states that ‘primary frontages’ are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. ‘Secondary frontages’ provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

⁶ NPPF (Annex 2) defines ‘main town centre uses’ as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

if suitable sequentially more preferable sites are not available. When considering edge and out of centre proposals, “...*preference should be given to accessible sites that are well connected to the town centre*” (paragraph 24). Applicants and LPAs should demonstrate flexibility on issues such as format and scale.

- Require an **impact assessment** if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m²). The NPPF (paragraph 26) states that this should include assessment of 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 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 the application is made.

2.12 The NPPF (paragraph 27) states that “...*where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused*”.

2.13 As previously stated in Section 1, this study also draws on advice set out in the *National Planning Practice Guidance* (NPPG), published in March 2014. The NPPG has streamlined and replaced the advice previously set out in *PPS4 Practice Guidance on Need, Impact and the Sequential Approach*. The revised PPG still places significant weight on the development of positive plan-led visions and strategies for town centres, and has retained the key sequential and ‘impact tests’. Of relevance to this study the PPG (para 003) states that the assessment of the potential for centres to accommodate new development and different types of development should cover a “*three-five year period*” but should “*also take the lifetime of the Local Plan into account and be regularly reviewed*”.

LOCAL PLANNING POLICY CONTEXT

2.14 The relevant development plans are the:

- **Waveney District Core Strategy**, adopted in January 2009. This sets out the overall approach to development across the district up to the year 2021.
- The **Development Management Policies Document**, adopted in January 2011, contains specific policies for delivering the vision, policies and objectives of the adopted Core Strategy.
- The **Lake Lothing and Outer Harbour Area Action Plan** (AAP), adopted in January 2012, is a spatial policy framework that promotes and guides regeneration for this specific area of Lowestoft. The document contains land allocations and thematic policies that are retail related.

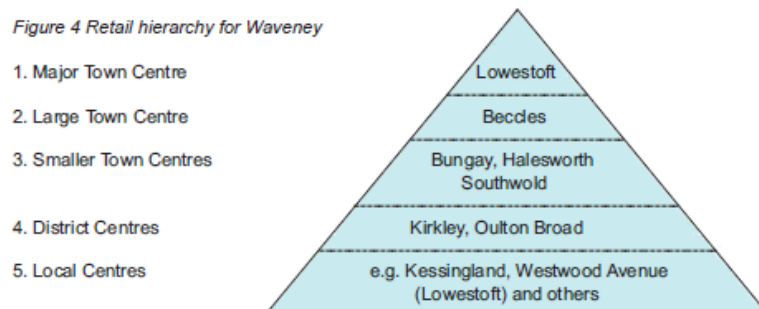
⁷ This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.

2.15 The Council is currently conducting a review of the Local Plan which will eventually replace the current plan and will cover the period up to 2036. The Local Plan will bring Waveney’s planning framework up to date and in line with national planning policy.

Waveney District Core Strategy

2.16 Until the new Local Plan is completed and adopted, the current Waveney Core Strategy will continue to form part of the policy context for decision-taking. The figure below shows the current network and hierarchy of centres in Waveney District as set out in the Core Strategy. Lowestoft is identified as a ‘Major Town Centre’ and will be the main focus for new retail development in the District. The market towns and District Centres (Kirkley and Oulton Broad) fall within the defined catchments of larger shopping centres and serve more localised catchments, although they do also function to varying degrees as important tourist and visitor destinations (particularly Southwold).

Figure 4 Retail hierarchy for Waveney



2.17 The most relevant policies in the adopted Core Strategy pertaining to town centres, retail and leisure include:

- **Policy CS10 (Retail, Leisure and Office Development)** provides guidance on the scale and location of new retail and leisure provision. It states that the vitality and viability of all town and district centres will be maintained and enhanced so they continue to act as a focus for a range of uses, including leisure and retail; therefore mixed-use schemes will be supported. The policy also focuses on protecting local services in smaller settlements by locating new leisure and retail developments in existing centres, where possible, and protecting existing retail in local neighbourhoods and rural villages to ensure the continued vitality and viability of these communities. Lowestoft town centre is the preference for retail and leisure development, specifically through the expansion of the town centre towards the Lake Lothing and Outer Harbour water frontage; followed by Beccles, Bungay, Halesworth and Southwold.
- **Policy CS05 (Lake Lothing and Outer Harbour Area Action Plan)** includes the creation of an enhanced role for Lowestoft as a retail centre, comprising the provision of around 21,000sqm of new comparison floorspace and associated leisure uses.

2.18 The Development Management Policies Document sets out the specific policies for retail and leisure development in the District. Relevant policies include:

- **Policy DM10 (Town Centre Boundaries)** states that proposals for new retail and leisure development will be permitted within the town centres of Lowestoft, Beccles, Bungay, Halesworth and Southwold. Proposals for change of use of ground floor premises from Class A1-A5, D2 and sui generis leisure uses to other uses will not be permitted.
- **Policy DM11 (Lowestoft Town Centre Main and Core Shopping Streets)** sets out the Council's policy for change of use of ground floor premises located in the main shopping streets. Uses other than A1-A5, D2 and sui generis will not be permitted. Throughout core shopping streets, applications for the change of use of ground floor premises from A1 to A2 will not be permitted. Proposals for changes of use to A3 and A4 will be permitted where they would have no significant impact either individually or cumulatively on the retail function and overall viability of the centre. Proposals for change of use of ground floor premises in the core shopping streets to A5 will not be permitted.
- **Policy DM13 (Kirkley and Oulton Broad District Shopping Centre)** states that change of use of ground floor premises from retail and financial and professional services to other non-retail uses will not be permitted. Proposals for change of use of other premises in the Kirkley and Oulton Broad District Shopping Centre to restaurants and cafes, drinking establishments and hot food takeaways will only be permitted where they have no significant adverse impact.
- **Policy DM14 (Local Shopping Centres)** establishes that proposals for small-scale retail and leisure uses will be encouraged within the local shopping centres across the district where the development proposed would be of an appropriate scale to provide an essential service for the local area. Proposals for change of use of ground floor premises to uses other than shops, financial services, restaurants and cafes, drinking establishments and hot food takeaway will not be permitted. The change of use of ground floor A1 retail premises to other retail uses will be permitted only when there would be no significant adverse impact.
- **Policy DM15 (Neighbourhood and village shops and facilities)** states that proposals to the change of use of village or neighbourhood shops, pubs, community centres and other similar facilities to other uses will be resisted unless a replacement facility of a similar size and quality is made available. In exceptional circumstances the loss of a local service/community facility may be permitted if an applicant can demonstrate that the facility cannot be made viable in the foreseeable future.

2.19 The Lake Lothing and Outer Harbour AAP includes policies for the regeneration of this and relevant retailing policies include:

- **Policy RLT1 (Town Centre Expansion and Retail within the AAP Area)** sets out the vision for new comparison retail and leisure to form part of a town centre expansion; including the

redevelopment of Peto Square which will be encouraged ahead of other town centre sites. No retail development will be permitted within the AAP area which has an adverse impact on the vitality and viability of the town centre.

- **Policy SSP2 (Peto Square and South Quay)** establishes the vision for these two areas to become the focus for retail and leisure development. Peto Square will involve retail and leisure development comprising A1-A5 uses, along with hotel and tourism developments. An enhanced transport interchange integrated into the railway station will also be developed. This would provide scope for improving access to the site and easing town centre congestion. South Quay will be developed and enhanced for commercial and port related activities.

Other Material Considerations

2.20 As part of the Localism Act, neighbourhood planning is an important process that enables local communities to influence and take forward planning proposals at a local level. Within Waveney District, current neighbourhood planning activity taking place involves:

- **Bungay** Town Council is currently in the process of creating a steering group to begin preparations on a Bungay Neighbourhood Development Plan. The first consultation is due to take place in early 2016.
- **Beccles** Neighbourhood Area was approved in August 2015 (including Beccles, Barsham, Ellough, Ringsfield, Shadingfield, Shipmeadow, Sotterley, Weston and Willingham). However little progress has been made so far in regards to the preparation of the plan.
- **Southwold** Neighbourhood Area was approved in May 2014. The Town Council is currently collecting data to inform the production of the plan.
- **Kessingland** Neighbourhood Area was approved in December 2013. A draft plan has been produced and this is currently being reviewed and amended.

SUMMARY

2.21 In summary, the underlying objective of policy at all levels is to maintain and enhance the vitality and viability of town centres, and to promote new sustainable development and economic growth in town centre locations “first” in accordance with the sequential approach. This policy objective is crucial as town centres are facing increasing economic challenges associated with alternative forms of retailing; in particular online shopping and competition from major out-of-centre developments (discussed further in Section 3).

3 RETAIL & TOWN CENTRE TRENDS

3.1 This section summarises some of the key trends that have fuelled the changes in the retail sector over the last three decades, and the impact of these trends on the UK's town centres. It provides a commentary on the impact of the downturn in the economy since 2007 and the growth of internet ('multi-channel') retailing on consumer spending, retail development and retailers' business strategies. Drawing on the latest research it also describes how these trends may continue to shape changes in the future, and whether and how town centres can respond to help maintain and enhance their overall vitality and viability.

RETAIL EXPENDITURE GROWTH

3.2 Following an unprecedented period of growth in consumer spending since the mid-1990s, the onset of the economic recession in 2007/08 had a dramatic impact on consumer spending and market demand. Business and consumer confidence was further weakened by public sector cuts, the rise in VAT, increasing unemployment, less expansionary consumer credit and the rising cost of living (including higher energy costs, petrol and housing prices). This has effectively reduced disposable income and retailers' margins are being squeezed further.

3.3 The table below shows the actual and forecast growth in retail (convenience and comparison goods) spending per head identified by Experian Business Strategies in their latest *Retail Planner Briefing Note 13* (October 2015).

Table 3.1 Forecast year-on-year growth in retail expenditure per capita

Vol. Growth per head (%):	-----ACTUAL GROWTH-----					FORECASTS				
	2010	2011	2012	2013	2014	2015	2016	2017	2018-22	2023-35
Total Retail Spend	0.9	-0.6	1.4	2.3	2.7	3.2	2.1	2.0	2.0	2.4
Convenience Goods	-0.8	-2.7	-0.4	-0.7	-1.8	-0.2	0.1	0.3	0.1	0.1
Comparison Goods	1.8	0.6	2.5	4.2	5.5	5.3	3.2	2.9	3.0	3.2

Source: Experian Retail Planner Briefing Note 13 (October 2015); Figures 1a and 1b.

3.4 Although there has been negative annual growth in convenience goods expenditure per capita levels since the onset of the recession in 2008, the forecasts for 2016 onwards show a return to positive growth. For comparison goods the forecasts show that annual growth rates are recovering from a low of -2.6% in 2009 to a high of +5.5% in 2014, before falling back to +3.2% in 2016 and +2.9% in 2017. Experian forecast that growth will average +3.0% per annum for the period 2018 to 2022, increasing to +3.2% for 2023 to 2025; although this is well below historic trends of 8% per annum for the period 1997 to 2007.

3.5 In summary there are positive signs of improvement in the UK economy and consumer and business confidence since 2014/15. Notwithstanding this, it is clear that forecast growth in retail sales volumes will be much lower and slower than in recent history. Furthermore, the retail sector is still vulnerable to fluctuations in the UK economy, and how it responds in the future to changes in the Eurozone and global economies.

SPECIAL FORMS OF TRADING AND INTERNET SHOPPING

3.6 *Special Forms of Trading* (SFT) comprises all non-store retail sales made via the internet, mail order, stalls and markets, door-to-door and telephone sales. On-line sales by supermarkets, department stores and catalogue companies are also included in the data collected by the Office for National Statistics (ONS).

3.7 Based on ONS data, Experian Business Strategies (EBS) estimate that the current (2015) value of internet sales is £42.1bn (current prices) and other (non-internet) SFT sales stand at approximately £7.9bn. This results in total SFT sales of £50bn in 2015 (£48.9bn in 2011 prices), which represents a circa 186% increase from £17.1bn recorded in 2006. Overall the market share of SFT as a proportion of total retail sales has increased from 5.6% in 2006 to 13.4% in 2015. This significant growth has been fuelled by internet shopping.

3.8 Up to now, the impact of Internet shopping has been mainly concentrated on certain retail products and services (such as, for example, electrical goods, books, music and travel). In turn, this has resulted in a reduction in the number of retailers selling these types of products and services on the high street (the most recent examples being HMV and Blockbusters). However this does not mean that other comparison goods categories are immune to the impact of the internet, including clothing and footwear.

3.9 The table below sets out Experian's latest forecasts of the growth in the total market share of SFT between 2016 and 2032, based on retail spending growth assumptions and predictions as to the future take-up and expansion of internet shopping⁸.

Table 3.2 SFT's market share of total retail sales

	2016	2021	2026	2032
TOTAL:	14.3%	18.3%	19.1%	19.5%
Comparison	16.5%	20.0%	19.9%	19.3%
Convenience	10.0%	14.7%	17.0%	19.9%

Source: Appendix 3 of Experian Retail Planner Briefing Note 13 (October 2015)

⁸ Please note that although no official data is available for convenience and comparison goods, EBS have provided their own market share estimates.

- 3.10 EBS forecast that non-store retailing will continue to grow rapidly over the short to medium term, outpacing traditional forms of spending. They predict that this growth will be sustained by new technology (such as browsing and purchasing through mobile phones) and the development of interactive TV shopping, but will slow after 2020.
- 3.11 However such forecasts need to be treated with caution, as according to Experian approximately 25% of all SFT sales for comparison goods and some 70% for convenience goods are still sourced through traditional (*'bricks-and-mortar'*) retail space, rather than from *'virtual'* stores and/or distribution warehouses. On this basis Experian has adjusted the SFT market shares to reflect the proportion of internet sales sourced from existing stores.

Table 3.3 SFT's revised market share of total retail sales

	2016	2021	2026	2032
TOTAL:	9.2%	11.7%	12.2%	12.4%
Comparison	12.4%	15.0%	15.0%	14.5%
Convenience	3.0%	4.4%	5.1%	6.0%

Source: Appendix 3 of Experian Retail Planner Briefing Note 13 (October 2015)

- 3.12 Although the growth in online sales will inevitably continue to impact on the need for traditional shops, some commentators believe that the development of multi-channelling as part of retailers' business models will result in internet shopping actually driving demand for *'bricks-and-mortar'* stores. This may be due to the need for *'click-and-collect'* facilities in easily accessible locations (for example, on the high street, in existing out-of-centre stores or at important transport nodes), or for *'showrooms'* where customers can view and test products in store before purchasing online. This co-ordinated multi-channel strategy should therefore help to support demand for retail space over time.

FLOORSPACE 'PRODUCTIVITY' GROWTH

- 3.13 Floorspace 'productivity' (or turnover 'efficiency') growth represents the ability of retailers to absorb higher than inflation increases in their costs over time (such as rents, rates and service charges) to help maintain their profitability and viability. It is standard practice for retail planning assessments to make an allowance for the year-on-year growth in the average sales densities of existing comparison and convenience goods retail floorspace.
- 3.14 However there is limited evidence detailing actual changes in the turnover and profitability of retailers over time. Furthermore analysis of past data and trends is complicated by the fact that sales density increases have been affected by changes in the use of retail floorspace over the last 20 years; such as, for example, the growth in out-of-centre retailing; Sunday-trading; longer opening hours; and the very strong growth of retail expenditure relative to the growth in floorspace. However following the recession many retailers struggled to increase or even maintain sales density levels and, together with other financial problems, this resulted in some retailers going out of business.

- 3.15 The table below sets out the latest sales density growth forecasts for comparison and convenience goods floorspace published by Experian Business Strategies (EBS), based on predicted changes in retail floorspace over time and after making an allowance for non-store retailing.

Table 3.4 Forecast 'productivity' growth rates (% per annum)

	2014	2015	2016	2017	2018-22	2023-35
Convenience	-2.0	-0.4	-0.4	-0.1	-0.1	+0.0
Comparison	+5.4	+5.5	+3.1	+2.2	+1.9	+2.0

Source: Figures 4a and 4b, Experian *Retail Planner Briefing Note 13* (October 2015)

- 3.16 The forecasts show that the scope for sales density growth is very limited for convenience goods retailing. This is mainly due to slow growth in sales volumes and limited additions to the floorspace stock. For comparison goods retailing, the trends towards more modern, higher density stores and the demolition of older inefficient space is forecast to continue, resulting in average growth rates of close to +2.0% per annum over the next two decades. However, this is still well below the rate seen during the boom of the early years of this century⁹.

RETAIL DEVELOPMENT PIPELINE

- 3.17 The retail development pipeline slowed dramatically during the economic downturn compared with the shopping centre 'boom' experienced in the ten year period up to 2007. One of the key impacts has been to 'weed out' some of the more expensive and unviable development schemes that were in the pipeline before the economic downturn.
- 3.18 The latest *Shopping Centre Development Pipeline Report* published by the British Council of Shopping Centres (BCSC) indicated that in 2012 the quantum of completed new shopping centre floorspace in the UK was at its lowest level since the 1990s. Following the development of circa 260,000m² in 2009, 232,000m² in 2010 and 280,000m² in 2011, no new floorspace opened in 2012. Notwithstanding this, the BCSC research also identified the first significant signs of new development activity in 2013 following the opening of circa 140,000m² of new retail floorspace (including Trinity Leeds). This is set to continue with a number of major schemes opening in 2015, including Grand Central in Birmingham and Old Market in Hereford. There are also positive signs that new investment is returning to the shopping centre market from UK-based and international funds seeking assets in prime and secondary locations that offer the potential for growth.
- 3.19 Given that it takes on average over ten years for a town centre scheme to be planned and developed, and can take even longer to deliver more complicated sites, then it follows that it will take a number of years for centres to benefit from the economic upturn and renewed investment and development confidence. Furthermore, the more challenging retail environment means that those

⁹ Please note that the floorspace 'productivity' growth rates forecast by EBS have been used to inform the retail capacity assessment set out in Section 11 of this study.

shopping locations outside the 'top 100' centres that missed the previous (pre-recession) development cycle may face a long wait for new town centre development, or require a new approach if they are to secure new shopping centre development in the future. Even then, the scale and type of new retail investment that will emerge in the post-recessionary period could be very different to the last "golden decade" of shopping centre development between 1997 and 2007.

RETAILER REQUIREMENTS

3.20 The economic downturn, in combination with other trends (such as changes in customer requirements, planning legislation and the growth in internet shopping), has created a need for retailers to review and rapidly adapt their business strategies, requirements and store formats. In general terms those retailers with strong brands and loyal customers, trading from the right stores in the right locations, and with a good online facility have managed to weather the economic storm. The following highlights some of the key trends that are occurring in the convenience and comparison goods retail sectors.

Convenience Goods Retailing

3.21 The changes in the food and grocery sector over the last decade illustrate the dynamic changes in the retail industry. Some of the key trends include:

- The move by all the major national grocery retailers into the smaller convenience store sector in order to increase market share further, including for example the Tesco 'Express', Sainsbury's 'Local' and 'Little Waitrose' formats.
- The growth of European 'deep discount' food operators (such as Aldi and Lidl) has also continued during the economic downturn. In response, this has resulted in the expansion of own-brand 'value' ranges by the established grocers.
- The 'race for more space' and new store openings over the last decade has also resulted in extensions to existing stores and/or new mezzanine space, and the growth of online shopping.

3.22 Over the last 12-18 months, however, the focus for the main foodstore operators has shifted to opening more convenience store formats, and growing their market shares of online sales. At the same time applications for large store formats have slowed significantly and permissions are not being built out in some cases. For example Tesco and Morrisons are disposing of some of their under-performing superstores, and Tesco is in the process of selling some 49 sites with permissions for new foodstores, including sites in Manningtree, Basingstoke and Dartford. This will inevitably have implications for the scale and type of new floorspace required by foodstore operators across the UK in the future.

Comparison Goods Retailing

- 3.23 In the non-food sector, those retailers that experienced significant growth up to 2007 have had to adapt to the very different market conditions. The retailers that have not been flexible enough to respond to changing consumer needs, or are being squeezed in the increasingly competitive 'middle ground' between high-end and value retailing, have largely struggled to maintain market share over recent years. In some cases, this has resulted in a series of high profile 'casualties' and a number of key retailers have either disappeared from our high streets altogether (e.g. Woolworths, TJ Hughes, Jessops and Jane Norman), or have gone into administration and been forced to reduce their representation in centres across the UK (e.g. HMV, Blockbusters, etc.).
- 3.24 Within town centres, some traditional high street multiple operators are also changing their formats and requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively looking for larger format new-build or existing stores in out-of-centre locations to accommodate new retail formats (such as John Lewis at Home) and display their full range of products. These changes in retailer requirements and market demand will continue to have a significant impact on the UK's town centres and high streets, particularly in those cases where retailers make the decision to relocate from town centres to out-of-centre locations, or even out of the area altogether.
- 3.25 Research also shows that there is an increasing polarisation of development activity and investment interest in the larger regional and sub-regional centres (i.e. the 'top 100' centres). This is because these centres usually have large and established catchment areas, and therefore represent less 'risky' investments in the current uncertain economic climate. These larger centres have also generally benefitted from recent new shopping centre development and investment over the last decade, and are therefore better placed than smaller and medium sized centres to accommodate retailers' requirements for modern larger format units. The continuation of these trends will impact on future operator requirements, with retailers looking to satisfy their demand for larger modern premises in prime shopping locations, with strong catchment areas and a good supply of appropriate retail space.
- 3.26 The out-of-centre sector has also not been immune to change. Since 2007 there has been a notable downturn in the demand from traditional 'bulky goods' retailers for new space. For example, during the late 1990s both B&Q ('Warehouse') and Homebase were rolling out very large out-of-centre retail warehouses (some exceeding 10,000m² gross) in an attempt to dominate market share. However, these same operators are now looking to close or scale down their under-performing stores in certain areas. Other 'bulky goods' operators have simply gone out of business (such as Focus DIY). Notwithstanding this, out-of-centre retailing still accounts for a significant proportion of existing and new retail floorspace and sales in the UK. For example recent research has highlighted the fact that

of the new retail developments approved since the NPPF was published in March 2012, 72% were in out of town locations, 16% were edge of centre and just 12% were in town centres¹⁰.

TOWN CENTRE FUTURES

3.27 A number of high profile research reports have been commissioned over recent years that set out recommendations and guidance on how to maintain and enhance the future vitality and viability of the UK's town centres. These include:

- The **Portas Review** (2011) reports on the findings and recommendations of research led by Mary Portas into the future of the High Streets. The report presented 28 key recommendations for government, local authorities and businesses to help high streets respond to the current challenges facing them and to prevent further decline.
- The **Grimsey Review** (2013) addresses the continuing decline of many local high streets. The review highlights the dramatic impact that recent technological changes have had on consumer behaviour and the knock-on effects for high streets. It suggests that the Portas recommendations failed to adequately account for this.
- The **Distressed Town Centre Property Taskforce** (DTCP) report (November 2013) was produced by an industry-led cross sector taskforce, assembled in response to the Portas Review. The report specifically focuses on the role that property ownership, investment, development and occupation can have on town centre viability, and provides recommendations on how the property sector can act to leverage in investment for town centres and support their ongoing viability.

3.28 The table below provides an overview of some of the common themes and recommendations identified by the different research in support of town centre revitalisation, including the Portas Review.

Strategy	Description
Reforming the management of town centres	Improving the ways in which town centres are managed was a key recommendation made by the Portas Review. In response, the Government has set up 27 'Portas Pilots' and 333 Town Teams, which bring together local councils, retailers and businesses to try out new ideas to drive their local economy. Strategies to deliver change are formulated in recognition of the particular strengths of each local area. It may be too early in the process to comment on the success of these, however a recent thought piece published by Portas (May 2014) has suggested that progress has been slow. There is also increasing financial support for Business Improvement Districts (BIDs) , which enable local businesses to take on responsibility for realising improvements in their local area. The Government has launched a BID Loan Fund to help those wishing to set up a BID in their area. Support for local (street) markets is also increasing, as a way to increase footfall and enhance the vibrancy of local centres. This was also a key recommendation in the Portas Review.

¹⁰ <http://www.acs.org.uk/en/research/planning.cfm> referenced in Why Our High Streets Still Matter: A Think Piece by Mary Portas, 30th May 2014.

<p>Making use of the planning system to protect and enhance town centres</p>	<p>The planning system is being used in various ways to enhance and protect local centres where possible. This includes maintaining use of ‘town centres first’ policies (as set out in the NPPF) in order to protect town centres from unnecessary competition from out-of-town developments. Where BIDs are in place, the improved planning conditions may also facilitate development. More stringent protection has been advocated by some sources. The Portas Review included a recommendation to introduce ‘exceptional sign off’ for all new out-of-centre retail development in order to protect existing centres. However, this was one of the few Portas recommendations that was not taken on by the Government. LPAs are also being encouraged to make use of CPOs in order to address issues of fragmented ownership and to facilitate comprehensive development across a centre.</p>
<p>Engaging communities</p>	<p>Encouraging communities to support their local high streets and town centres is essential and was a key recommendation in the Portas Review. Recent strategies to promote community participation in the development of local centres have included government support for communities wishing to take on the responsibility for ownership and management of assets of community value, such as their local pub or shop. A £19 million fund has been set up and more than 300 assets have already been listed under the Community Right to Bid.</p>
<p>Leveraging investment and funding</p>	<p>There are a number of new sources of public sector investment now available to facilitate improvements to local centres. These include £3.6m of funding via the Town Teams, a High Street Innovation Fund worth £10m and High Street renewal awards to date worth £1m. The DTCP suggestion that a workable Tax Increment Finance (TIF) model be put in place has since been actioned by the government. This will allow LPAs to raise finance to fund development and infrastructure based on the projected future increase in business rates resulting from investment. The DTCP report has also recommended greater engagement between LPAs and the private sector in order to tackle the challenges faced by town centres proactively. They support the use of joint venture partnerships between the public and private sector to facilitate development. A recent report by Peter Brett¹¹ suggested a new method that would involve the selection of a Property Company Partner (possibly private sector) who will then fund future investment in the centre. The Property Company would be assisted by the LPA through use of CPOs and restricting leases to de-fragment the ownership of the high street.</p>
<p>Adapting to take on the threat from increasing internet sales</p>	<p>Recent research has highlighted the importance of recognising the threat from increasing internet retailing as an important trend that will continue over the short term. Some centres are adapting better than others for example, the incorporation of Click & Collect (delivery and returns) points into centres. Other more general strategies include ensuring adequate parking and accessibility to improve the general accessibility of the centre. The Grimsey Review recommends that town centres focus on their role as a community hub, where retail is just one element, creating a diverse offer which will help local centres to compete more effectively with online retailers. The DTCP recommends adapting retail capacity models in order to account for the erosion of the physical retail space requirement in the face of competition from online retail. LPAs in many secondary town centres will need to actively plan for this future loss of retail space requirement, particularly from the larger retailers.</p>
<p>Encouraging a mix of uses</p>	<p>A recent trend has been the growing presence and proportion of food and beverage (F&B) units within shopping centres and high streets. A BCSC report¹² suggests that there are various benefits that may result from this, and recommends that shopping centre development include a mix of retail, F&B and leisure which are generally mutually supportive. However, there are also warnings that this is not the whole solution to filling current vacancies left by retail decline. The BCSC recommends that F&B units in retail centres should be targeted appropriately according to the likely consumer profile. Conversion from shops to residential uses is also becoming one way for LPAs to make better use of underused retail space and prevent unwanted vacancy. Increased residential populations living in or near to the town centre will also improve footfall and potentially spend in these areas. However, with high levels of pressure due to national housing shortages, there is a danger that the influx of residential development into town centres could undermine the retail and leisure functions of the centre.</p>

¹¹ Peter Brett (2013): Investing in the High Street: Town Centre Investment Management & its role in delivering change

¹² BCSC (2014), Food and Beverage: A solution for shopping centres?

- 3.29 Although there are positive signs that the UK is finally beginning to emerge from the economic downturn, it is clear that our town centres and high streets post-recession will be very different to the 'boom' years of the last decade. Over the short to medium term at least the economy is forecast to experience a sustained period of lower growth in consumer spending, reduced bank lending, limited access to credit and cuts in public sector expenditure. This presents significant challenges for all those involved in town centre management, development and investment.
- 3.30 The growth of online shopping is also impacting on the vitality and viability of many of Britain's centres and high streets. This is placing pressures on rental growth and market demand in many centres; particularly the smaller secondary centres and market towns outside the 'top 100' shopping locations. This has been further compounded by rising vacancy levels and the loss of key retailers. As a result, the share of non-food retail sales conducted through town centre shops has declined; from 64% in 2002 to just over 40% by 2013. In our opinion, a far more uncertain future awaits the next wave of new retail investment and development. The evidence suggests that high quality schemes in the strongest prime shopping locations will continue to prosper. In contrast, the weaker secondary centres and shopping locations with a more limited offer, smaller catchments and negligible market demand will struggle to attract market interest and investment.
- 3.31 Notwithstanding the threat of online shopping, industry experts still predict that the demand from major retailers for new space will continue as it remains the primary mechanism for retailers to 'reach' their customers and grow their businesses. Over the short to medium term any increased demand for space from retailers will have to be met by the current retail stock (i.e. existing shopping centres, the high street and out-of-centre facilities), as there is limited new retail floorspace in the pipeline in town centres. With increased demand and the lack of supply over the short to medium term, research for the British Council of Shopping Centres (BCSC) predicts that this will effectively 'push up' rental levels for the larger modern desirable units until a significant amount of new development reaches completion. As a result, over the medium term, retailers will be competing for limited available space. Therefore those centres that are able to accommodate and deliver new developments over the next 5-10 years should be in a good position to attract operator interest. However, this will depend on the new retail floorspace being in the right location (i.e. preferably prime shopping locations) and having the right size, format and specification to meet the needs of modern retailers.
- 3.32 Research by the BCSC has also identified an increased emphasis on asset management, as owners and developers invest in the expansion or refurbishment of existing shopping centres to increase their investment value and turnover. In the current economic climate this investment in existing assets is less risky and financially onerous than new build projects. However, as the supply of suitable units "dry up" in prime locations, so retailers will also look at alternative options for delivering growth, such as through new out-of-centre openings, increasing sales through the internet, and/or expanding internationally.

- 3.33 Finally, although the NPPF reinforces the longstanding policy objective of promoting development and investment in town centres first, the market appetite for new and extended shopping facilities in out-of-centre locations shows no signs of slowing. The lack of available, suitable and viable sites in town centres to meet the demands of modern retailers and commercial leisure operators for larger format units will inevitably result in an increase in new out-of-centre applications and/or applications to widen 'bulky conditions' conditions on existing retail parks.
- 3.34 In this context, it is clear that the 'top 50-100' prime centres and shopping locations in Britain should continue to flourish once the economy recovers. The greatest challenge facing local planning authorities will be how to revitalise the fortunes of struggling small and medium sized centres and market towns that do not have the critical mass of retail, leisure and other uses to compete for more limited investment and development; including the centres in Waveney District.

4 CATCHMENT AREA & SHOPPING PATTERNS

- 4.1 This section first defines the catchment/study area that provides the basis for the quantitative and qualitative needs assessment. It then describes the scope of the household telephone interview survey and summarises the key headlines of the survey-derived market share analysis for convenience and comparison goods retailing.

CATCHMENT AREA

- 4.2 The definition of an appropriate study (catchment) area is an important starting point for any retail and town centre assessment. In this case the Study Area has been defined using postcode geography and covers Waveney District in full, as well as some outlying areas including Great Yarmouth Borough, Suffolk Coastal and, Mid Suffolk (see Plan 1, **Appendix 1**).
- 4.3 The Study Area has been sub-divided into eight zones based on postcode geography, and taking into account the location of the main centres and shopping facilities in each District. These zones provide the sampling framework for the household telephone interview survey. In this case zones 3-5 broadly cover the local planning authority area and are treated as a 'proxy' for shopping patterns across the District. This zone-by-zone approach also enables more detailed analysis of shopping patterns and expenditure flows both within and outside the District and Study Area for the purpose of the retail capacity assessment, in accordance with good practice.

SHOPPING PATTERNS

- 4.4 NEMS Market Research was commissioned to carry out a household telephone interview survey (HTIS) across the defined study area in October 2015. The questionnaire was designed by Carter Jonas (CJ) in collaboration with Waveney District Council. The questionnaire is reproduced in **Appendix 2** along with the survey methodology. The full 'weighted' survey results are set out in **Appendix 3**.
- 4.5 In total, some 1,000 interviews were conducted across eight zones (i.e. a minimum of 100 surveys per zone in accordance with accepted good practice). NEMS carried out structured interviews by telephone with the person responsible for the main household shop. A number of measures were put in place by NEMS to ensure each sample was representative of the profile of the person responsible for shopping in the household. Responses across the study area were weighted by the population in each zone to ensure that the results of respondents in more sparsely or heavily populated areas were not under or over represented in terms of the market share assessment. This is a standard approach that helps to ensure the survey results provide a robust and realistic picture of shopping and leisure patterns.
- 4.6 The survey results help to identify broad patterns and preferences for different types of convenience and comparison goods shopping purchases, as well as leisure use across the study area. The key

findings are used to inform the baseline market share analysis¹³ and turnover estimates that underpin the quantitative retail capacity assessment, as well as the qualitative needs assessment.

Convenience Goods – Market Share Analysis

- 4.7 Convenience goods¹⁴ retailing is generally defined as comprising everyday essential items (including food, drinks, newspapers/magazines and confectionery), as well as an element of non-durable housing goods (such as washing up liquid, kitchen roll, bin bags, etc.).
- 4.8 The survey-derived market share (%) analysis for all convenience goods shopping is set out in Table 1 of **Appendix 4**. It should be noted that for this stage of the analysis the market shares for both convenience and comparison goods retailing include expenditure on *Special Forms of Trading*¹⁵ (including internet sales), but exclude 'null' responses (such as 'don't knows', etc.) in accordance with good practice.
- 4.9 The overall market shares in Table 1 have been derived from the analysis of the responses as to where people normally shop for their main ('bulk') and 'top up' grocery purchases. The market shares for these different types of food shopping are set out in detail in Tables 2-3 of **Appendix 4**.
- 4.10 In order to avoid the market share analysis of food shopping patterns being 'skewed' by larger superstores and foodstores in the study area, the survey also asked respondents where else they normally shop (if anywhere) for their 'main' and 'top up' purchases in addition to the first store identified. The market shares are set out in Table 4 for 'top up food purchases' and Table 5 for 'other top up food purchases' (**Appendix 4**).
- 4.11 The responses for 'primary' and 'secondary' food shopping purchase have then been merged through the application of a weighting based on judgements as to the proportion of household expenditure normally accounted for by each type of convenience goods shopping. In this case we have assumed a standard weighting of 65% for main 'bulk' shopping; 10% for secondary main 'bulk' shopping; 15% for primary 'top-up' shopping; and 10% for secondary 'top-up' shopping.
- 4.12 The key findings of the market share analysis are briefly described below.
- 4.13 In terms of the market share of Special Forms of Trading (SFT), and principally internet shopping, Table 1 (Appendix 4) shows that the share of all food shopping across the study area (i.e. Zones 1-8) is 7.3%. SFT's share is lower for the Waveney District area (i.e. Zones 3-5) at 4.8%, but higher for

13 It is common practice in retail assessments to deduct special forms of trading (i.e. purchases over the internet, mail order shopping and market stalls) from average expenditure per capita figures at the outset according to national forecasts derived from Experian Business Strategies. Internet shopping and special forms of trading have therefore been filtered out from the survey results before undertaking the market share assessment.

14 For the purpose of this retail assessment 'convenience goods' and 'food' shopping have the same meaning.

15 A more detailed explanation of SFT is set out in Section 3.

Zone 6 (11.7%) and Zones 7-8 (10.3%). It should be noted that the SFT's market share within the District area has increased from the 2% recorded by the previous 2006 household survey.

- 4.14 In comparison, Experian's latest *Retail Planning Briefing Note 13* (October 2015) shows that the national average market share for non-store (SFT) convenience goods retail sales is 10% (see Section 3). Given that SFT currently accounts for a significantly smaller market share within Waveney District (4.8%) than the national average (10.0%), this suggests that there could be potential to increase its market penetration in the future. If this was to occur, then it would potentially reduce the expenditure available to support the need ('capacity') for new ('physical') retail floorspace over the forecast period to 2036 (see Section 11)
- 4.15 Turning to the market share analysis for the main centres and stores in the District, Table 1 shows that they are achieving an overall market share ('retention level') of 40.1% within the study area (Zones 1-8). In the Waveney District area (Zones 3-5) the average 'retention level' is higher at 89.9%, which suggests that the District's population is well served by existing food and convenience stores.
- 4.16 Of the total retention of 40.1% across the study area, the District's out-of-centre stores are achieving a market share of 27.8%, and the town, district, local and village centres account for the residual market share of 12.3%.
- 4.17 Within Waveney District the market share of out-of-centre stores increases to 64%. This reflects the overall provision, scale and attraction of the District's out-of-centre foodstores, and principally:
- **Morrisons** (Tower Road, Lowestoft) – which is achieving a 13.2% market share of all grocery purchases within Waveney District (Zones 3-5);
 - **Asda** (Belvedere Road, Lowestoft) – a 12.1% market share within the District area;
 - **Tesco** (Leisure Way, Lowestoft) – a market share of 11.9%;
 - **Aldi** (Millennium Way, Lowestoft) – a 9.4% market share; and
 - **Morrisons** (George Westwood Way, Beccles) – 7% market share.
- 4.18 Of the total 89.9% 'retention level' within Waveney District, the main centres are achieving a lower market share of 25.9%. The survey results show that Beccles is achieving the highest market share of all the centres of 9.4%, which is largely accounted for by the strong market share of Tesco (7.4%). The positive impact of Tesco on Beccles is reflected by the fact that the town centre was only recorded as having a 1% market share in 2006.
- 4.19 Halesworth is achieving the next highest market share of 5.4%, followed by Lowestoft (5.3%). The relatively low market share for Lowestoft reflects the strong provision and impact of the out-of-centre

stores on the town centre. Furthermore the town centre's market share has fallen from 7% recorded in 2006. This points to a potential 'gap' in Lowestoft town centre's foodstore offer.

- 4.20 Southwold (0.7%) and Bungay (0.3%) have much lower market shares for food shopping, which reflects the relatively limited convenience goods floorspace and offer in these centres.
- 4.21 In terms of the total 5.3% 'leakage' to other competing stores outside Waveney District (Zones 3-5), the survey results show that Great Yarmouth's stores, Morrisons in Gorleston and Tesco in Caister-on-Sea to the north are achieving a combined market share of 1.9%. The foodstores in Saxmundham (1.2%) and Norwich (0.5%) are also achieving a relatively modest market share within Waveney District. This level of 'leakage' does not give cause for concern, as it reflects the fact that people are carrying out their 'main' and 'top up' food shopping purchases as part of their daily and/or weekly activities; such as, for example, commuting to and from work.

Comparison Goods – Market Share Analysis

- 4.22 Comparison goods¹⁶ are generally defined as items not obtained on a frequent basis and include clothing, footwear, household and recreational goods (also see Glossary of Terms). The household survey comprised questions on the main groupings of non-food expenditure, as defined by Experian in the latest *Retail Planner Briefing Note*, including: 'clothing and footwear'; recording media; electrical goods; books; furniture and carpets; DIY and garden products; medical goods; etc.
- 4.23 Table 1 (**Appendix 5**) shows the market shares (%) for all comparison goods shopping purchases made both within and outside the Study Area. These total market shares have been informed by the shopping patterns for the different types of comparison goods expenditure set out in Tables 2-12. The market share analysis (%) takes account of the distribution and weight of spend (£) by households on the different comparison goods categories. This ensures that that the resultant shares are not 'skewed' by any particular comparison goods expenditure category. This is a standard approach for retail assessments.
- 4.24 As for the analysis of convenience goods, the market shares include expenditure on Special Forms of Trading (SFT) but exclude all 'null' responses. The key findings of the market share analysis are briefly described below.
- 4.25 Table 1 (Appendix 5) shows that SFT's share of all food shopping across the study area (i.e. Zones 1-8) is 17.3%. The average market share for Waveney District (i.e. Zones 3-5) is lower at 15.3%, but higher for Zone 6 (19.1%) and Zones 7-8 (19.4%). SFT's market share in 2006 was significantly lower, at approximately 5%.

¹⁶ Please note that comparison goods and non-food shopping have the same meanings.

- 4.26 In comparison, Experian's latest *Retail Planning Briefing Note 13* (October 2015) shows that the national average market share for non-store (SFT) comparison goods retail sales is 16.5% (see Section 3). Given that SFT currently accounts for a slightly smaller market share within Waveney District (15.3%) than the national average (16.5%), this suggests that there could be potential for SFT (and specifically Internet shopping) to increase its market penetration in the future. If this was to occur, then it would potentially reduce the expenditure available to support the need ('capacity') for new ('physical') retail floorspace over the forecast period to 2036 (see Section 11)
- 4.27 Turning to the market shares for the main centres and out-of-centre stores and shopping facilities in the District, Table 1 shows that they are achieving an overall 'retention level' of 24.7% within the total study area (Zones 1-8). Of this total, the District's out-of-centre stores are achieving a market share of 5.9%, and the town, district, local and village centres have a combined market share of 18.8%.
- 4.28 In the Waveney District area (Zones 1-3) the average 'retention level' is higher at 57%. The total market share of out-of-centre stores and shopping facilities is 13.9%. The main out-of-centre shopping destination is North Quay Retail Park, which is achieving a total market share of 10.6%¹⁷. The Asda at Belvedere Road has the next highest market share of 1.8%.
- 4.29 Of the total 57% 'retention level' within Waveney District, the main centres are achieving a higher market share of 43.1%. Lowestoft's role as the principal shopping centre serving Waveney District and a wider area is reflected by its 30.5% market share from within the District (and 12.2% across the total study area). Its market share within the District area is higher than recorded in 2006 (c.21%).
- 4.30 Beccles Town Centre (including Tesco) is achieving the next highest market share of 6.5%, which is higher than its 2006 market share of 5%. Halesworth (3.0%), Bungay (1.6%) and Southwold (0.6%) have much lower market shares. The other smaller centres in Waveney District are achieving a total market share of 0.9%.
- 4.31 In terms of the total 27.7% 'leakage' to other competing stores outside Waveney District (Zones 3-5), the survey results show that Norwich City Centre is the preferred shopping destination with a market share of 21.4% (although this is lower than the 30% recorded in 2006). Great Yarmouth is the next most popular shopping destination for people living in Waveney District; but the combined market share of the town centre and out-of-centre shops is significantly lower than for Norwich, at 1.5%.
- 4.32 Figure 4.1 below shows the market shares for Waveney District's main centres and stores, other centres and SFT/internet shopping for residents in the study area (Zones 1-8) for different categories

¹⁷ Please note that B&Q closed its store in North Quay Retail Park in January 2016, after the household telephone interview survey had been conducted.

of comparison goods expenditure, based on the survey-derived results set out in Tables 2-12 (Appendix 5).

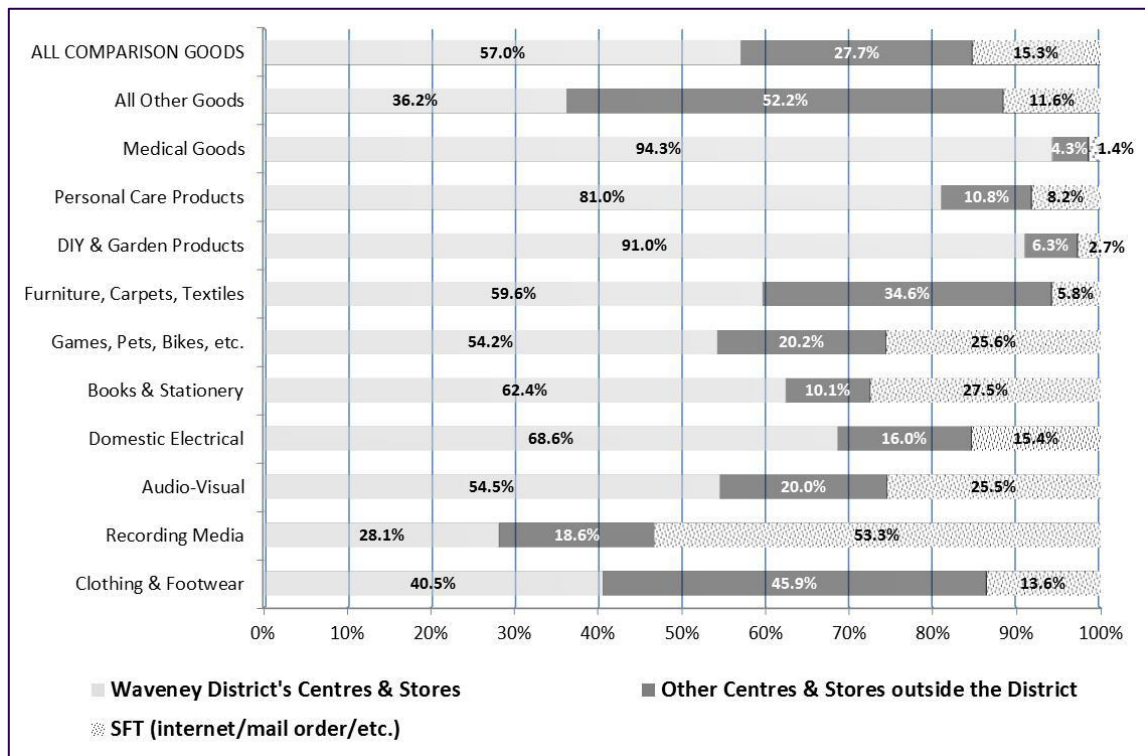
- 4.33 The figure shows the relatively strong competition from other centres and shopping facilities located both within and outside the defined study area for different types of comparison goods expenditure. For example, 66.9% of expenditure on clothing and footwear purchases in the study area is going to centres outside of Waveney District; principally Norwich City Centre (42.2%), Great Yarmouth's town centre and out-of-centre stores (12.5%) and, to a lesser degree, Ipswich Town Centre (4.4%).
- 4.34 The figure also confirms the high market share of SFT, and principally internet shopping, on certain categories of comparison good expenditure; specifically recording media (56.5%); books and stationery (32.8%); audio-visual (31.6%); and toys, games, bikes, pet products, etc. (25.0%). In contrast, SFT's market share of other non-food categories is more limited, including DIY (3.4%); medical goods (3.6%); furniture and carpets (7.5%); personal care products (11.1%); and clothing and footwear (14.2%). However, this does not necessarily mean that these specific sectors will be 'immune' from the growth in internet shopping over the medium to long term.

Figure 4.1 Study Area (Zones 1-8): Market Shares for Different Non-Food Retail



- 4.35 Figure 4.2 below shows the higher comparison goods market share of Waveney's centres and stores in the District area only (Zones 3-5).

Figure 4.2 Waveney District (Zones 3-5): Market Shares for Different Non-Food Retail



4.36 However, compared with other categories, there is still a relatively high 'leakage' of expenditure on clothing and footwear (45.9%); furniture, carpets and textiles (34.6%); and 'all other' comparison goods (52.2%)¹⁸ to centres and stores outside the District.

4.37 For all categories the highest 'leakage' is to Norwich City Centre and its out-of-centre shopping facilities; for example, 41.3% of expenditure on clothing and footwear in the District is 'leaking' to Norwich City Centre. This reflects the relative scale, range and quality of Norwich's comparison goods and fashion offer, and its important role as the major regional centre serving Norfolk.

¹⁸ The 'other' comparison goods category includes jewellery & watches; glassware, china, tableware and household utensils; and other personal effects, such as travel goods, suitcases, prams, sunglasses, etc.

5 LOWESTOFT TOWN CENTRE: HEALTH CHECK UPDATE

5.1 Sections 5-9 of this study provide health check updates for the five main centres in Waveney District; namely Lowestoft, Beccles, Bungay, Halesworth and Southwold Town Centres. Sections 10-11 also provide a high level review of the offer in the District's smaller district and local centres, including Kirkley and Oulton Broad.

METHODOLOGY

5.2 Health checks are widely used to appraise and monitor the changes in the overall vitality and viability of town centres. They are an important planning 'tool' to help inform both plan-making and decision-taking at the local level. The PPG (paragraph 005) identifies the following Key Performance Indicators (KPIs) that are normally used (where the information exists) to help assess the overall health and performance of centres.

- the scale and diversity of uses (e.g. retail and services offer);
- retailer representation and demand;
- commercial property indicators (such as Prime Zone A Rents);
- changes in vacancy levels;
- accessibility and parking provision;
- the quality of the town centre environment;
- pedestrian footfall; and
- customers' views and behaviour.

5.3 In this case the health check assessments have been informed by the audits and Retail Factsheets prepared by Waveney District Council since 2006. The town centre uses have been broken down by specific retail and service categories to help identify the scale and diversity of uses, vacancy levels, retailer representation, and highlight any significant 'gaps' in provision.

5.4 Where possible, we have benchmarked the provision in the main centres against each other and against the national averages sourced from Experian Goad's audit of approximately 1,950 UK centres and shopping locations. To help inform our assessment we have also referred to other datasets and research including EGi and CoStar's published data on retailer requirements and Prime Zone A rental levels. This has been further supplemented by site visits and audits of the main town centres carried out by Carter Jonas in November 2015.

5.5 During our November 2015 site visits, we also engaged with key stakeholders to gain a better understanding of the overall strengths and weaknesses of each centre, the potential opportunities for improvement and growth, and any threats to their future vitality and viability. The key stakeholders

we engaged with as part of our site visits included the Chairs of Southwold Chamber of Trade, Kirkley Business Association and Bungay Chamber of Trade (this stakeholder is also a local shop owner and town councillor); the Lowestoft Vision BID Manager; and Vice-chair of Beccles Business and Tourism Association (this stakeholder is also a local shop owner and Co-ordinator for the Waveney Business Forum). In addition we have also spoken with the Chair of Halesworth Business Connections.

CONTEXT

- 5.6 Lowestoft is the largest town and main shopping centre in Waveney District. It is classified as a ‘Major Town Centre’ by the adopted Core Strategy, at the top of the District’s retail hierarchy. It performs an important role serving the District’s convenience, comparison and service needs, as well as a wider tourist and visitor market.
- 5.7 As the figure below shows, the Council’s *Town Centre Boundaries Background Paper* (TCBBP) has defined London Road North as the ‘Core Shopping Street’ (CSS). The ‘Main Shopping Street’ (MSS) extends north and south from London Road North, to include the High Street, Commercial Road and Suffolk Road.

Figure 5-1 Lowestoft Town Centre



- 5.8 Drawing on our site visit and consultation with the Council, we have assessed the following three key shopping areas for the purpose of this health check update
- The pedestrianised **London Road North**, extending from McDonalds in the south, at the junction with Station Square, up to and including Beales Department Store in the north is defined by the Council as Lowestoft’s ‘Core Shopping Street’. This street is characterised by a number of department, variety stores and national multiple retailers; including Beales, Palmers department store, Marks and Spencer, Boots, Argos and Clarks. It also includes the Britten Shopping

Centre, which is accessed via Britten Centre Road off London Road North. This is the main shopping centre in Lowestoft, which opened in the 1980s and has an estimated retail floorspace of 9,300m². Key tenants include Iceland, Superdrug, WH Smiths and Card Factory and there is also a market which operates to the rear of the centre. There are a number of secondary shopping streets that extend off London Road North which are characterised by a more varied mix of uses, including:

- **Bevan Street East:** located just off the southern end of London Road North and extending to Clapham Road South. It is mainly characterised by lower value, independent stores and services including hair and beauty salons and an electrical repair centre. Other occupiers include a café, carpet shop and specialist mobility store. There are vacancies dispersed along this road (including an opticians and café) and a number of buildings are in poor condition (such as, for example, the vacant Café Mango building).
- **Suffolk Road:** located to the southern end of London Road North, off Bon Marche. The northern side was formally anchored by the Godfrey's Department Store; however we note that part of this store closed in September 2015 leaving some of the street frontage vacant. The southern side includes a tattoo parlour, take away, cafés and women's clothing store. From our site visit we consider that the street would benefit from improvement to shop fronts.
- The town's traditional **High Street** is located to the north and is physically separated from the rest of the centre by Artillery Way (A12). This area is distinct from the primary shopping frontage on London Road North and has a different retail offer, largely dominated by independent and specialist retailers. Occupiers include hair salons, restaurants and cafes, takeaways, second-hand goods stores and a bicycle shop. Vacancies are dispersed along the linear High Street and footfall here was observed to be lower than on London Road North. It appears that the street's vitality and viability has been weakened by the Council's move away from the High Street to Riverside Road nearby to the out-of-centre Asda superstore.
- The area south of **Station Square** incorporates Station Square and Pier Terrace, which is located just over the Bascule Bridge. The busy A12 road passes through this area and the units are all located along one side with the marina situated on the other. Pedestrians are required to travel over the bridge from Station Square to Pier Terrace. Due to the peripheral location, there is lower footfall and a very limited retail offer here compared with the town's other main shopping streets. Hot-food takeaways and retail shops dominate the offer found here; however retail provision is limited to only three comparison goods units.

RETAIL COMPOSITION AND DIVERSITY

- 5.9 The assessment of the current retail and service provision in Lowestoft (measured by outlets and floorspace) has been informed by Waveney District Council's *Retail Factsheets* (2006-2015). This evidence has been supplemented by audits conducted by the Council in May 2015 and our own site visits in November 2015.

5.10 The tables below summarise the provision of Class A and D2 units and floorspace in Lowestoft as of May 2015 based on the (audit) spreadsheets provided by the Council. By way of clarification the tables identify the provision in the primary shopping area (which includes London Road North, Britten Centre, Bevan Street East, Suffolk Road, Commercial Road, Gordon Road, Battery Green Road, Denmark Road, Grove Road, Clapham Road South, Regent Road and Alexandra Road), as well as the High Street to the north and area south of Station Square.

Table 5.1 Lowestoft Town Centre: Retail Composition by Units, 2015

Category		London Road North / Other		High Street		South of Station Square		Total	
		Units	%	Units	%	Units	%	Units	%
A1	Shop	118	53.2%	26	57.8%	5	38.5%	149	53.2%
A2	Financial Services, etc.	62	27.9%	3	6.7%	2	15.4%	67	23.9%
A3	Restaurants & Cafes	12	5.4%	8	17.8%	0	0	20	7.1%
A4	Drinking Establishments	6	2.7%	2	4.4%	2	15.4%	10	3.6%
A5	Hot Food Take-Away	8	3.6%	2	4.4%	4	30.8%	14	5.0%
D2	Assembly & Leisure	4	1.8%	0	0	0	0	4	1.4%
	Sui Generis	12	5.4%	4	8.9%	0	0	16	5.7%
TOTAL:		222	100%	45	100%	13	100%	280	100%

Source: Waveney District Council - Town Centre Audit 2015

Table 5.2 Lowestoft Town Centre: Retail Composition by Floorspace, 2015

Category		London Road North / Other		High Street		South of Station Square		Total	
		sqm	%	sqm	%	sqm	%	sqm	%
A1	Shop	36,055	68.7%	2,555	44.9%	354	23.0%	38,964	65.2%
A2	Financial Services, etc.	8,232	15.7%	320	5.6%	184	11.9%	8,736	14.6%
A3	Restaurants & Cafes	1,524	2.9%	1,544	27.1%	0	0	3,068	5.1%
A4	Drinking Establishments	1,146	2.2%	373	6.6%	515	33.4%	2,034	3.4%
A5	Hot Food Take-Away	710	1.4%	166	2.9%	489	31.7%	1,365	2.3%
D2	Assembly & Leisure	2,176	4.1%	0	0	0	0	2,176	3.6%
	Sui Generis	2,661	5.1%	733	12.9%	0	0	3,394	5.7%
TOTAL:		52,504	100%	5,891	100%	1,542	100%	59,737	100%

Source: Waveney District Council - Town Centre Audit 2015

5.11 In total Lowestoft has 280 retail, service and leisure units trading from a total floorspace of 59,737m². This is significantly higher than for the largest market town of Beccles (183 units and 24,400m²), and reflects Lowestoft's role and function as the principal shopping destination in the District.

5.12 The following provides a more detailed review of the relative attraction and offer in the three main identified shopping areas:

London Road North – Primary Shopping Area

5.13 Lowestoft's retail provision is concentrated within the main defined town centre primary shopping area. This area has the largest mix of town centre uses in comparison to the High Street and the

area south of Station Square. There are a total of 222 retail, service and leisure uses in this area, equivalent to almost 80% of Lowestoft's total provision, trading from a total floorspace of 52,504m².

- 5.14 As part of the overall Class A1 offer, there are some 91 comparison units in the primary shopping area, which is equivalent to 64.3% of all class A1 and sui generis uses (see Appendix 6). Of this total provision the representation of clothing and fashion accessory shops is the highest of all three Lowestoft areas (9.93% of all comparison goods) and the District's other main centres, apart from Southwold which has a higher proportion of clothing outlets than Lowestoft town centre, even though it is significantly smaller. There are also a high proportion (9.22%) of electrical goods and repair retailers in Lowestoft town centre, equivalent to 13 shops.
- 5.15 Convenience provision is limited when compared to the High Street and the other market towns in Waveney District (7.80% of all class A1 and sui generis uses). The Council's data identified 11 convenience stores in Lowestoft town centre in total including two bakeries, two health food stores and three supermarkets. In terms of supermarket provision, the centre is served by smaller format Iceland and Tesco stores, and Almis, an independently owned store. As explained in Section 4, the limited provision of foodstores in the town centre is largely explained by the six larger out-of-centre stores including two Morrisons stores on the North Quay Retail Park and Tower Road Retail Park; Lidl on Peto Way; Asda off Belvedere Road; Tesco on Leisure Way; and Aldi on Millennium Way.
- 5.16 The representation of service retailers in Lowestoft is generally in line with the District's other market towns, although there is a lower provision of service businesses in the town centre than on the High street. The main service businesses in the primary shopping area include eight hairdressers/barbers outlets (equivalent to 5.67% of total class A1 and sui generis uses); five opticians (equivalent to 3.55% of all units); two travel agents (equivalent to 1.42% of all units); and one post office.
- 5.17 We understand that there is a ban on markets taking place along the pedestrianised London Road North, although the area has been used recently for events, including a popular Halloween-themed weekend with activities distributed along the street.
- 5.18 Leisure service provision is below UK averages and includes eight hot-food takeaway units, twelve restaurants and cafes, six drinking establishments and four assembly and leisure units including a bingo hall, two social clubs and one rehearsal studio.
- 5.19 Lowestoft has one theatre (The Marina Theatre) which is located just off London Road North. The theatre hosts plays, musical performances and comedy, and also has a cinema screen, bar and café. There is also a multi-screen cinema (East Coast Cinema) located on London Road North, just over the Bascule Bridge. However this cinema is small in size by modern standards, with only four screens. We assess the potential for additional new cinema provision in Lowestoft and the District in more detail in **Section 12**.

5.20 Key gaps in provision include sports and leisure facilities and hotel provision, none of which are represented in Lowestoft Town Centre. In our judgement increasing the number and quality of hotels in and around the town centre would help to raise the town's profile as a visitor destination and encourage overnight stays.

5.21 The number of finance and business services in the centre is considered to be high (27.9% of all retail, service and leisure use) and includes nine property services and eight retail banks. Major banks represented in the centre include Halifax, Nationwide, HSBC, Natwest and Barclays

High Street

5.22 The High Street area of Lowestoft is situated to the north of the town centre area and has weak linkages to London Road North due to the A12 'barrier'. There is a much smaller retail provision here and a weaker mix of uses in comparison to the primary shopping area. There is a total of 45 retail, service and leisure uses, trading from a total gross floorspace of 5,691m². Of the total units, some 26 are Class A (57.8% of all retail, leisure and service units). This is lower than the proportion of shops in Lowestoft town centre, or in any of the District's market towns.

5.23 The High Street has 17 comparison units (equivalent to 53.15% of all Class A1 and sui generis uses). As the more detailed table in Appendix 6 shows, the comparison provision includes three clothing and fashion accessory shops (9.38%) and a mix of antique/second hand goods, arts/craft goods, art gallery sales, leisure shops, electrical goods and jewellers.

5.24 Convenience provision is also limited, with three independent retailers (equivalent to 9.38% of total A1/Sui Generis outlets - see Appendix 6), comprising two supermarkets and one confectioner (two independent international supermarkets and Sabrina's Traditional English Sweetshop). With a total estimated floorspace of approximately 341m², the scale of convenience retailing is significantly lower than on London Road North; for example, the total floorspace of just the Tesco and Iceland stores is 2,643m².

5.25 The Triangle Market is located on the High Street and is characterised by small market canopies known as '*the Eastern Sails*'. There is space for only a few traders here and, as far as we are aware, there is limited publicity surrounding the market and its events across the town centre. There could therefore be potential to promote the market more widely across the town centre and/or assess potential opportunities for the redevelopment of this key gateway site on the High Street.

5.26 Although there is a relatively high proportion of service retailers on the High Street (equivalent to 18.75% of all class A1 and sui generis uses), the mix of service provision is very limited; comprising five hairdressers/barbers and one travel agent. Leisure service provision is relatively good (26.6% of all retail, service and leisure uses) and includes eight restaurants and cafes, two public houses and

two hot-food takeaways. Restaurant and café provision (17.8%) is also higher than for the primary shopping area (5.4%). Appendix 6 provides a more detailed table of these figures.

- 5.27 Key gaps identified include sports and leisure facilities and hotel provision, none of which are represented on the High Street.
- 5.28 The provision of finance and business services on the High Street is also low in comparison to Lowestoft town centre and the District's market towns (6.7% of all retail, service and leisure uses). There are two estate agents and an employment agency. Unlike the town centre, there are no banks or building societies on the High Street.
- 5.29 In summary, there are no major multiple retailers or anchor stores on the High Street. It has a more traditional retailing role and is characterised by the range of independent retailers trading from smaller shop units. In our judgement improvements to the links between the High Street and the town centre, promoting the market more widely, and increasing the food and beverage offer could help to generate additional footfall and prevent this area becoming increasingly isolated from the rest of the town centre.

South of Station Square

- 5.30 The area south of London Road North includes Pier Terrace and Station Square, which is in close proximity to the railway station and marina and includes the RLT1 town centre expansion area. The area south of Station Square is located on the periphery of the centre and over the Bascule Bridge. It does not operate in the same way as the other two areas, particularly the town centre, and it is not directly comparable.
- 5.31 There are only 13 retail, service and leisure use units trading from a total estimated floorspace of 1,542m². The retail provision in this area is very limited and there is little variety in the mix of town centre uses when compared to the other areas of Lowestoft and the four market towns. In summary:
- There are only five A1 shop units in this area of the town which is equivalent to 38.5% of all the units. Of this figure, there are no convenience goods retailers.
 - Although comparison goods are represented in this area, there are only three units (37.50% - see Appendix 6), comprising a charity shop, electrical goods retailer and a mobility scooter shop.
 - There are two retail service providers in this area which are both hairdressers/barbers.
 - Leisure provision includes four takeaways, which represents 30.8% of all retail, service and leisure uses and two drinking establishments.
 - There are two financial and professional services in the area south of Station Square. This includes an estate agent service.

- There are no major national multiples present in the area and all retail and retail services are independently owned.

VACANCY LEVELS

5.32 Vacancy levels provide one of the key performance indicators (KPIs) for assessing the relative health of centres, and measuring how their attraction and performance may be changing over time. However, vacancy figures should be treated with caution as they only represent the current status of units and do not reflect the ongoing changes within a centre.

5.33 In this case we have drawn on the vacancy levels recorded in the Council's *Retail Factsheets* and Town Centre Audit (May 2015), as well as our site visits conducted during November 2015. The vacancy levels for each separate shopping area is set out below:

- **The High Street:** The Council recorded seven vacant units along the High Street area in May 2015. This is equivalent to a vacancy level of 15.6% which is above the national average for all centres recorded by Experian of 11.4%. Of these recorded vacancies, the highest concentration was recorded towards the Triangle Market area with numbers 84, 87 and 88 all vacant. During our recent site visit in November 2015, there was one additional vacant unit (number 75, UK Engravers). There was also a concentration of vacant units including a large hotel, butchers, bakery and the District Council's former offices to the north of the High Street. However these have not been included in the Council's May 2015 Town Centre Audit data and are not within the town centre boundary.
- **London Road North:** There were 39 vacant units recorded by the local planning authority in May 2015. This is equivalent to a vacancy rate of 17.6%, which is significantly above the national average recorded by Experian. However it should be noted that the majority of these vacancies are concentrated on secondary shopping streets off London Road North; for example, there are five vacant units on Bevan Street East. Vacant units along London Road North, the prime shopping street, are more dispersed and we did not note any areas of strong concentration. On the day of our visit we recorded that two units in the Britten Centre that were previously vacant in May 2015 (units 12 and 99) have since been occupied by Holland and Barrett and Calendar Club. This has reduced the total vacancies from four to three since May 2015.
- **South of Station Square:** there were five vacant units in this secondary shopping area in May 2015, which was equivalent to a vacancy rate of 38.6%. This is the highest vacancy rate of all the shopping areas in Lowestoft. Of these five vacancies, three are located over the Bascule Bridge along Pier Terrace which represents the periphery location of the area. The high vacancies reflect the weak pedestrian linkages to London Road North and the prime shopping area, and the significantly lower footfall in this area.

RETAILER REQUIREMENTS

5.34 Retailer demand for representation in a shopping location normally provides a good indication of a centre's overall attraction, health and viability. The CoStar Focus national retailer requirements database is a standard published dataset used to inform retail assessments and provides consistently sourced evidence detailing the changes in retailer requirements over a period of time. As the table below shows, CoStar recorded six requirements for Lowestoft in November 2015. There was demand from four national multiple retailers and two leisure operators. Of the retail requirements, most were national multiples. However it should be noted that the majority of the retailers identified are seeking larger format units.

Table 5.3 Lowestoft: Retailer Requirements

Category	Name	Max floorspace (m2)
Retail	Cards Direct	139
	Bensons For Beds	743
	Halfords Ltd	743
	Select	465
Leisure	Greene King	929
	Frankie & Benny's	743

Source: Costar FOCUS, March 2015

5.35 Notwithstanding this high level assessment of current market demand, many retailers prefer not to publish their requirements as it could damage their negotiating position where they are seeking representation in new locations. Moreover, such databases can only identify the current level of market demand and do not reflect how demand might change in the future following new development and investment. For example experience shows that a new scheme that offers retailers modern, well-configured floorspace adjacent to like-minded tenants in a prominent location will generally generate a significant uplift in market interest and demand.

PRIME ZONE A RENTS

5.36 The level of rent that businesses are prepared to pay for retail space in a centre provides a further indication of the relative strength of the centre and its prime retail pitch as a shopping location.

5.37 The 2008 Retail Study found that prime retail rental values in the centre had decreased by 3% in the period from 2002 to 2008. Carter Jonas market research indicates that current rents achieved for units in the prime retail area are around £430 to £485 per m². This is a significant reduction based on historic values, but such levels are not considered to be particularly low based on the current retail market.

Table 5.4 Prime Zone A Retail Rents (2015)

Centres	Estimated Prime Zone A Rental Values (£ per m ²)
Norwich	£2,050
Ipswich	£1,300
Great Yarmouth	£485
Lowestoft	£430
Beccles	£400
Southwold	£200
Halesworth	£180
Bungay	£180

Source: Carter Jonas (based on recent transactions and informed judgements)

- 5.38 It should be noted that there is limited evidence of recent transactions in Southwold and although a Prime Zone A in the region of £200 per m² has been identified, it is considered that a much higher value of in the region of £350 per m² could be achieved if a good shop unit on the High Street became available.

ACCESSIBILITY & PEDESTRIAN FLOWS

- 5.39 Lowestoft is accessible via the A12 (Inner Ring Road). The road provides access to the south connecting to Ipswich and to the north to Great Yarmouth. There are nine Council-run car parks within the three defined shopping areas, and a total of 22 Council-run car parks across the whole of Lowestoft. Details of these car parks are presented in the table below.

Table 5.5 Lowestoft: Council-owned Car Parks

Car Park	Spaces	Short Stay/ Long Stay	Car Park	Spaces	Short Stay/ Long Stay
Adrian Road Pay and Display	47	Long Stay	Albany Road Free Parking	40	Long Stay
Alexandra Road Pay and Display	42	Long Stay	All Saints Road Free Parking	40	n/a
Battery Green Multi Storey	541	Long Stay	Britten Centre Multi Storey	330	Long Stay
Belvedere Road Pay and Display	160	Long Stay	Claremont Pier Pay and Display	105	Long Stay
Clapham Road Pay and Display	166	Short Stay	Kirkley Cliff Pay and Display	51	Long Stay
Clifton Road Pay and Display	105	Long Stay	Melbourne Road Free Parking	14	n/a
Links Road Pay and Display	250	Long Stay	Pakefield Road Pay and Display	100	Long Stay
Cliff Edge Free Parking	4	Long Stay	Regent Road Pay and Display	54	Long stay
Pakefield Street Pay and Display	48	Long stay	St Margarets Plain Free Parking	40	Long Stay
Royal Green Pay and Display	143	Long Stay	Tennyson Road Pay and Display	28	Long Stay
St Peters Street	32	Long Stay	Albany Road Free Parking	40	Long Stay
Whapload Road Pay and Display	107	Long Stay	All Saints Road Free Parking	40	n/a

Source: Waveney District Council- Car Park Directory

- 5.40 There is generally considered to be a good provision of car parking throughout the town centre, but it has been identified by Lowestoft Vision that there is currently only a 20-30% usage of these car parks and there may therefore be an opportunity to reduce parking provision to accommodate other development. For example, Battery Green car park with 540 spaces is identified as an underused

space where there could be possibility for part of the building to be converted for use for retail development. There are also issues surrounding the perceived safety of these car parks and improvements to their environment, lighting, signage, etc. would help to improve the perceptions of them and increase their usage.

5.41 Lowestoft rail station is located in the south of the town centre, only a short walk away from the primary shopping street of London Road North. Regular services to both Ipswich and Norwich operate from the rail station. The main bus station is also located adjacent to The Britten Centre and it is well connected to the town centre. In September 2013 a new bus-rail interchange was opened at Lowestoft rail station with the aim to make trips to and from the station easier for bus passengers, improve access for pedestrians and taxis and consequently reduce congestion in the town centre. Additionally, the Station Building Renovation Delivery Group, which is led by Lowestoft Vision and Waveney District Council, secured £10,000 from the Heritage Lottery Fund to begin a scoping project that will consider a proposal to renovate the historic railway building, an initiative that would help to preserve Lowestoft's heritage. These developments form part of the Peto Square and South Quay AAP.

5.42 Town centre traffic is channelled onto the ring road, which enabled the pedestrianisation of the core shopping area of London Road North and part of the High Street in the north of the centre. As a result of this, the majority of the centre is free from traffic. Observations made during the 2015 site visit confirmed that pedestrian flows are strongest along the pedestrianised London Road North and throughout Britten Shopping Centre. The High Street had a noticeably lower pedestrian count which further demonstrates the need to promote stronger linkages between these two areas of the town centre.

CUSTOMER VIEWS AND PERCEPTIONS

5.43 The household telephone interview survey asked specific questions on respondents' views and perceptions of Lowestoft Town Centre as a place to shop and visit for a wide range of uses and attractions. This included identifying key improvements to the town centre that might encourage them to visit more often for shopping and other purposes. The survey results showed that respondents liked the following features of Lowestoft. The top 15 results are shown in the table below.

5.44 The majority indicated that they like '*nothing/very little*', which is a common response in such surveys. A key factor for respondents who visit Lowestoft Town Centre is its proximity to their home. Respondents also liked Lowestoft's range of non-food shops, the attractive environment and the traffic free centre. This confirms the findings of the health check site visit.

Table 5.6 Feature respondents liked about Lowestoft Town Centre

Response	Study Area
Nothing/very little	33.34%
Close to home	19.33%
Good range of non-food shops	16.03%
Attractive environment/nice place	12.02%
Compact	8.58%
Traffic free shopping centre	6.26%
Easy to park	3.36%
Other	3.50%
Quiet/not too busy	2.49%
(Don't know)	1.74%
Easy to get to by car	1.79%
Good range of pubs, cafes or restaurants	1.79%
Makes a change from other places	1.24%
Good facilities	1.23%
Easy to get to by bus	0.94%

Source: HTIS 2015

- 5.45 Respondents were also asked what, if anything, they would improve in Lowestoft Town Centre that would encourage them to visit more. The table below provides a summary of the top 15 frequently raised suggested improvements for the town centre.

Table 5.7 Key Improvements for Lowestoft Town Centre

Response	Study Area
Nothing	43.54%
(Don't know)	18.83%
More national multiple shops/high street shops	14.44%
More/better comparison retailers (i.e. non-food shops)	5.97%
More/better parking	5.15%
Free car parking	5.28%
Better access by road	4.24%
Cleaner streets	3.31%
Other	2.72%
More/better food shops	1.69%
A complete revamp	1.95%
Reduce traffic congestion/improve traffic flow	1.65%
New/better bridge	1.30%
Less vacant shops	0.82%
More/better places for eating out (e.g. cafes and restaurants)	0.75%

Source: HTIS 2015

- 5.46 The majority in each zone stated 'nothing/very little' or 'don't know' (62.37% across the whole Study Area). Key improvements that were identified include provision for more high street branded shops, including better comparison retailers. Access by road and resolving issues with congestion were also identified, which was confirmed in the 2015 site visit and health check. Respondents also highlighted a desire for free car parking or more/ better car parking in the town centre.

ENVIRONMENTAL QUALITY

- 5.47 Generally, the town centre is considered to be environmentally attractive due to the pedestrianisation of the core shopping street (London Road North). Improvements to the public realm along the

pedestrianised street were also made during the summer, including upgrades to litter bins, street lighting and benches. The Council is also in the process of upgrading the street planting along the street. The London Road North area is generally clean and tidy, although some of the upper level facades appear to be untidy and are in need of refurbishment.

- 5.48 The High Street has a strong character with historic buildings that make a positive contribution to the streetscape. However there are a large number of vacant units and 'tired' shop frontages that detract from the area's overall attractiveness as a shopping and leisure environment. The street is very quiet in nature when compared to the southern part of the town centre, with relatively low footfall.
- 5.49 The public realm here is also not of the same quality as along London Road North. There are few benches, litter bins or street planting and the area would benefit from the same upgrades that took place along London Road North. The northern part of the High Street is not pedestrianised and although at the time of visit the traffic flow was very slow, the narrow pavements are not appropriate for high numbers of pedestrians. There are more signs of dereliction along the High Street are there are a number of larger vacant buildings including the former Waveney District Council building and the Crown Hotel.

OUT-OF-CENTRE PROVISION

- 5.50 Lowestoft's out of centre provision consists of two dedicated retail parks and a number of key out of town stores.
- 5.51 North Quay Retail Park is Lowestoft's main retail warehouse destination located on the edge of the town centre, close to the railway station. There are a total of 15 units which are occupied by mainly bulky goods retailers, including Halfords, Argos, Pets at Home, Next and Costa Coffee. However, B&Q closed their store at the retail park in November 2015, and the unit was vacant at the time of our audit. There is also a Morrison's supermarket located within the retail park. There are approximately 571 car parking spaces.
- 5.52 Tower Road Retail Park is located north of the junction of the A12 London Road. Retailers include Morrison's, Homebase and B&M as well as a Pizza Hut restaurant. There are also a number of standalone retail warehouses and foodstores located in this area, including:
- Wickes, Peto Way;
 - Lidl, Peto Way;
 - Aldi; Millennium Way ;
 - Asda superstore and Dunelm Mill, Lothing Retail Park; and
 - Tesco Superstore, Leisure Way.

NEW INVESTMENT AND POTENTIAL DEVELOPMENT

- 5.53 The key new developments and investments identified for Lowestoft include **Peto Square and South Quay** which, as described in Section 2, are allocated in the *Lake Lothing and Outer Harbour Area AAP* for new retail, leisure and commercial development to extend the town centre southwards. There are also a number of **car parks** in the town centre that may have potential for redevelopment. The development opportunity of these two sites and others in and on the edge of the town centre to accommodate new retail, leisure and town centre needs is considered in more detail in Section 13 of this study.
- 5.54 Other potential development and investment opportunities include the following:
- The Scores area east of the historic High Street is proposed for development as a smaller scale site within the *Lake Lothing and Outer Harbour Area AAP*. Residential and employment development will be supported which respects the historic character of the area and which retains all existing employment uses. The development would aim to enhance connections between the High Street and East of England Park/PowerPark; enable the creation of a new score to the north of the area; and provide environmental improvements of the existing historical scores routes.
 - PowerPark, the area south of Ness Point and west of Battery Green Road which includes Waveney and Hamilton Dock, is also allocated within the AAP for a cluster of businesses focused upon the energy sector and offshore engineering. In 2012 a Local Development Order adopted for the site removed the need for planning permission for certain types of industrial development. Progress so far includes the move by Sembmarine SLP into new premises on the site. Lowestoft has also been chosen as the operations and maintenance base for Galloper offshore wind farm involving the conversion of the ABP port's old fish market into the new base.
- 5.55 Outside the town centre a planning application has recently been submitted for the redevelopment of the former Zephyr Cams factory site to accommodate a mixture of A1 and A3 uses. Planning permission has also been granted for the construction of an infill unit to replace the B&Q Garden Centre on North Quay Retail Park, which will reduce the total floorspace from 1,009m² to 990m². The construction of a retail warehouse with a total of 3,865m² gross internal floor space was also approved in 2014 but has not yet been implemented. A subsequent variation of condition application to amend the store layout and subdivide it into smaller units was recently approved.

SUMMARY

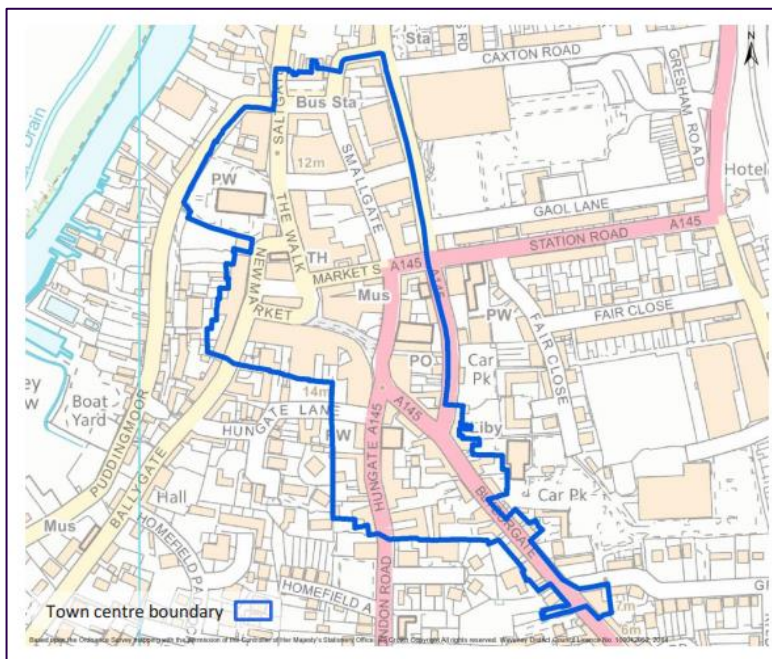
- 5.56 Our updated health check has identified that Lowestoft Town Centre has a number of strengths and weakness as a shopping location, as well as potential opportunities for new investment and development to help meet any identified capacity and/or 'gaps' in its retail and leisure offer. In summary some of the key headlines of the health check are as follows:

- The centre is divided into three distinct shopping areas: London Road North (the primary shopping area) provides a pedestrianised, safe focal point for the town centre and main shopping activity; the High Street is separated from the pedestrianised London Road North by Artillery Way and linkages to this shopping area are poor and need to be improved; and the area south of Station Square is on the periphery of the centre with very little retail provision.
- Although the centre has a range of high street comparison brands, it would benefit from further investment from major comparison retailers to help 'claw back' some leakage of shoppers and expenditure to other larger town centres.
- The centre also has a range of independent retailers, particularly concentrated along the High Street. The High Street could be planned to complement the town centre's more mainstream multiple offer, but better linkages need to be established.
- The Triangle Market place needs to be better promoted and improvement of this area could also help to regenerate the High Street and improve its draw to a wider customer base.
- There is a small proportion of food and convenience stores in the town centre in comparison to the District's market towns. The High Street has a higher proportion of independent food and convenience goods stores than London Road North, and there is no provision in the area around Station Square. In contrast there are six large edge of/out of centre stores in Lowestoft.
- Vacancy levels across the town centre are relatively high, particularly on the High Street and Station Square. There are a number of large units situated on the High Street and there is a concentration of vacancies along Bevan Street East.
- There is a shortage of hotel provision in the centre. Development of overnight accommodation could encourage additional visitors to the town and bring footfall into the centre.
- The town centre is overrepresented in regards to financial and professional services; they currently represent 27.9% of all retail, service and leisure uses in this shopping area.
- The car parks throughout the town centre have been identified as being underused and there could be potential for development of some of these sites to make way for additional retail and leisure provision.
- Recent public realm upgrades have improved the environmental attractiveness of London Road North. It is considered that it would be beneficial for similar upgrades to be implemented along the High Street.

6 BECCLES TOWN CENTRE: HEALTH CHECK

- 6.1 Beccles is the largest market town in Waveney district and is classified as a ‘*Large Town Centre*’ in the District’s retail hierarchy by the adopted Core Strategy.
- 6.2 The rural and predominately residential settlement is located on the edge of the Broads National Park and is on the banks of the River Waveney which runs adjacent to the centre in the west. The town has a good mix of multiple and independent retailers and service businesses, anchored by the Tesco superstore to the east of Newgate. Beccles also has a relatively strong evening economy, appealing to both families and couples, and attracting visitors from outside of the town.
- 6.3 The town centre is compact and does not have a clearly defined primary shopping area, as its retail and leisure uses are dispersed throughout the centre. The *2006 Retail Study* identifies Smallgate and New Market as the main focus for retailing, particularly for comparison goods. This area includes Boots, Superdrug and Co-op. Other areas of retail concentration include Blyburgate to the north of the town centre and Newgate near to the Tesco superstore. The defined Town Centre boundary is set out below:

Figure 6-1 Beccles Town Centre



- 6.4 Although there are no allocated primary and secondary frontages, the defined town centre above includes the following main shopping streets and areas:
- **Smallgate** is anchored by a Beales department store at its northern end, where the street amalgamates with Old Market which is the main drop off and pick up point for buses. The street is characterised by a mix of national multiple (include New Look) and independent retailers.

There are many buildings of interest along Smallgate including the public hall and a number of buildings with historic shopfronts (such as The Needlecraft Shop and Tilney & Son gunsmith). Our observations on the day of visit indicate that the northern end has a higher pedestrian flow compared to the southern end of the road due to its proximity to the bus 'station' and the nearby Tesco store to the west, which encourages visitors to make linked trips via the north of Smallgate down to Market Street and New Market to the south.

- **New Market** is characterised by a number of national multiple retailers (including WH Smith, Boots, Co-op and Superdrug), along with high street banks and estate agents. There is a good mix of independent comparison and convenience retailers including niche shops (such as a wedding hat boutique), although the unit sizes are generally small by modern standards. There are also a number of restaurants and public houses in the area (including the Kings Head, The Swan and Graze) which help to support the evening economy.
- **Blyburgate** is relatively underused and on the day of our visit, pedestrian footfall was very low. Retail units are dispersed along both sides of this more secondary street. It is located towards the southern edge of the centre and is too far a distance for pedestrians to conveniently walk from the Tesco store and associated car park. The retail and service offer consists of mainly independent and niche occupiers (such as a dog groomers, antique stores, sewing and craft shop and a wedding dress boutique). Of the few vacant units recorded within the town centre, the majority are located along Blyburgate. There is a vacant laundrette and another unit which was vacant but is now undergoing refurbishment. Although underused, the street and shop frontages are nevertheless well-maintained.
- **Newgate** comprises a number of both larger format units (including Iceland and Laura Ashley) and smaller units (including Fat Face and Holland and Barrett). The street has a direct route to the large Tesco superstore (with a total sales area of 3,252m² net). Although there is a limited retail offer on Newgate it does fulfil an important role in linking pedestrian visits from the town centre to the superstore. The Tesco store offers around 35% non-food goods and includes an in-store Costa Coffee. There are a total of 24 checkouts, deli, bakery, pharmacy and phone store and many of the traditional high street products and services can be found here all within one store.

6.5 Beccles has a weekly Friday afternoon market and a farmer's market that operates twice a month on New Market. There is also a bi-annual antique market and a late night Christmas event which attracts a high level of footfall into the town centre. Based on our discussions with the Vice-Chair of *Beccles Business and Tourism Association* we understand that there is a plan to expand the tourism offer outside of the season. We were also understand that town centre information points are being integrated into existing shops within the town centre and the current Information Centre, which is run by volunteers, is due to close. By providing local shop owners with window stickers, leaflets and training to operate their own information points within their shops, it is anticipated that footfall will be

encouraged into the town centre and to local businesses. There is also considered to be a shortage of overnight accommodation, particularly of the budget price range, which limits visitor numbers, especially of families and groups.

RETAIL COMPOSITION AND DIVERSITY

6.6 The assessment of the current retail and service provision in Beccles (measured by outlets and floorspace) has been informed by Waveney District Council's *Retail Factsheets* (2006-2015), supplemented by their audit conducted by the Council in May 2015 and our own audit in November 2015. The table below shows the changes in the distribution of retail units and floorspace between 2006 and 2015.

Table 6.1 Beccles: Changes in Retail Composition by Units and Floorspace, 2006-15

Category	June 2006				May 2015				Change: 2006-15	
	Unit	%	sqm	%	Unit	%	sqm	%	Unit	sqm
A1 Shop	108	67.5%	12,700	66.1%	118	64.5%	15,900	65.2%	+9.3%	+25.2%
A2 Financial, etc.	31	19.4%	3,700	19.3%	37	20.2%	4,100	16.8%	+19.4%	+10.8%
A3 Cafés, etc.	6	3.8%	600	3.1%	12	6.6%	1,400	5.7%	+100.0%	+133.3%
A4 Drinking, etc	5	3.1%	1,100	5.7%	3	1.6%	1,000	4.1%	-40.0%	-9.1%
A5 Take-Away	6	3.8%	500	2.6%	6	3.3%	400	1.6%	0.0%	-20.0%
D2 Leisure, etc.	2	1.3%	300	1.6%	3	1.6%	600	2.5%	+50.0%	+100.0%
Sui Generis	2	1.3%	300	1.6%	4	2.2%	1,000	4.1%	+100.0%	+233.3%
TOTAL:	160	100%	19,200	100%	183	100%	24,400	100%	+14.4%	+27.1%

Source: Waveney District Council - *Retail Factsheets* 2006 and 2015

6.7 There are an estimated 183 retail, service and leisure units in Beccles trading from a total floorspace of 24,400m². This is significantly higher than the second largest market town of Bungay, which has 109 units and a total floorspace of 14,300m². When considering all uses in Beccles town centre (including B1 business, B8 storage and distribution, C1 hotels, C2 residential institutions, C3 residential and D1 non-residential institutions), the total number of town centre uses increases to 258 units.

6.8 As the table shows there has been a +27.1% increase in total retail, service and leisure floorspace since 2006 and a +133.3% increase in Class A1 floorspace. This is mainly explained by the opening of the large Tesco store on the edge of the town, and associated investment in new shops and businesses.

6.9 Beccles has a relatively good provision of comparison goods units (65.85% of all class A1 and Sui Generis uses). Southwold is the only other district market town to have a slightly higher proportion of comparison goods retailing (69.23%). Of this total, 9.76% are classified as charity shops (12 units), which is higher than for the other market towns. Beccles also has 11 clothing and accessories outlets, which is equivalent to 8.94% of total provision, and is the second highest in the District after

Southwold. The majority of comparison goods categories are represented in the centre including arts/craft shops, book shops, chemists, electrical goods and footwear.

- 6.10 In terms of convenience retailing, although its provision is lower than the District's other three market towns at 13.82%, it has the largest gross floorspace (7,074m²). This is explained by the large Tesco superstore, along with a small Co-op located in the Market Square and an Iceland store adjacent to Tesco. Other convenience offer includes bakeries, butchers, a delicatessen and greengrocers.
- 6.11 Service retailers account for 13.82% of total units (Appendix 6). This is only slightly lower than Bungay, which has the highest proportion of retail service units (13.89%) of the market towns. This category includes important local services that meet the needs of the surrounding rural population (including a post office and dry cleaners). Provision also includes twelve hairdressers/barbers and two opticians.
- 6.12 Leisure service provision represents 13.1% of total units, which is below the UK average of 22.5%. Of this figure, 6.6% are restaurants/cafés and 3.3% are hot food takeaways. Key gaps include sports and leisure facilities, night clubs and bingo halls, none of which are represented in Bungay Town Centre. There is also a potential need for additional drinking establishments and hotels as there appears to be limited representation of these in the town.
- 6.13 The Council's latest audit identified 37 financial and professional services in the centre. This is equivalent to 20.2% of total outlets and is above the UK average of 10.9%. This figure includes six high street banks and nine estate agencies, which reflect the town centre's role as an important service centre¹⁹.
- 6.14 In terms of major retailers in the centre, Beccles has a higher representation of these than any other market town in Waveney District. As described above, Boots and WH Smith are located around New Market; New Look is on Newgate; and Tesco is an important anchor store helping to generating linked trips and expenditure to the benefit of other shops and services in the centre. Other multiple retailers in the centre include Laura Ashley, Superdrug, the Edinburgh Woollen Mill and M&CO.
- 6.15 There are currently no retailer requirements listed for Beccles Town Centre.

VACANCY LEVELS

- 6.16 Vacancy levels provide one of the key performance indicators (KPIs) for assessing the relative health of centres, and measuring how their attraction and performance may be changing over time. However, vacancy data should be treated with caution as they can represent only the current status of units and do not reflect the ongoing changes within a centre.

¹⁹ The total number of financial and professional units recorded by the Council includes beauty salons and bookmakers which are now classified as *Sui Generis*. If these uses are subtracted from the Council's figure it results in a total of 30 financial and professional services.

- 6.17 In this case we have drawn on the vacancy levels identified by the Council's 2015 *Retail Factsheet*. This indicates that there were thirteen vacant units in the town centre in May 2015 (Table 1, Appendix 6). This is equivalent to a vacancy rate of 7.1%, which is below the national average for all town centres recorded by Experian of 11.4%. Of these recorded vacancies, the highest concentration (six units) was recorded along Blyburgate, which is considered to be underused in comparison to the rest of the town centre. The vacancy rate has increased by +30% since 2006, although this only represents an increase in vacant units by three.
- 6.18 On the day of our site visit in November 2015, we recorded only seven vacant units in the town centre which is a significant reduction from the vacancy rate recorded by the Council in the 2015 Retail Factsheet.

ACCESSIBILITY & PEDESTRIAN FLOWS

- 6.19 Beccles is accessed via the A146, which bypasses the town. There are eight Council-run car parks in Beccles, all of which are a combination of both pay and display and free of charge. These are displayed in the table below. There is limited space available for on-street parking in the town centre on Friday's when the market is being held. Aside from the Tesco car park, there are two free car parks in Beccles however these are considered to be of poor quality and in inconvenient locations. The Blyburgate car parks are also underused. There is considered to be a need for additional short-stay car parks in the centre as people who work in the centre as well as visitors are occupying the car parks. The Tesco superstore is considered to have been beneficial for the town as the three hour free parking provision encourages footfall in the town centre. However it has taken passing trade from Blyburgate.

Table 6.2 Council-run car parks in Beccles

Car Park	Number of Spaces	Short Stay/Long Stay
Blyburgate East and West	255	Long Stay
Hungate Pay and Display	66	Long Stay
Newgate Pay and Display	75	Long Stay
Quay South Free Parking	12	Short Stay
Waveney Meadow Free Parking	60	Long Stay
Blyburgate Pay and Display	n/a	Short Stay
Kilbrack Free Parking	30	Long Stay
Quay North Free Parking	270	Long Stay

Source: Waveney District Council - Car Park Directory

- 6.20 The town is served by a railway which provides services to both Ipswich and Lowestoft. Regular bus services to Beccles from the town's rural hinterland operate from the main bus station located at Old Market.
- 6.21 On the day of our visit, pedestrian flows were buoyant, especially along New Market. A market was also operating within the market place. Footfall levels were high across the market area and around

the vicinity of the WH Smith and Boots stores. Beyond this, especially along Blyburgate, shopper footfall diminishes. There was also evidence of linked trips being made from the Tesco store to the rest of the town centre.

CUSTOMER VIEWS AND PERCEPTIONS

6.22 The household telephone interview survey asked specific questions on respondents' views and perceptions of Beccles Town Centre as a place to shop and visit for a wide range of uses and attractions. This included identifying key improvements that might encourage people to visit the town centre more often for shopping and other purposes. The 'top 15' features respondents liked about Beccles Town Centre are listed below.

Table 6.3 Features respondents liked about Beccles Town Centre

Response	Study Area
Attractive environment/nice place	33.87%
Good range of non-food shops	29.22%
Close to home	13.04%
Traditional	11.18%
Easy to park	7.50%
Compact	7.35%
Nothing/very little	6.87%
Good pubs, cafes or restaurants	5.48%
Makes a change from other places	6.52%
Good range/quality of independent shops	4.93%
Good food stores	3.20%
Easy to get to by car	3.65%
Quiet	3.89%
Other	3.37%
The market	2.56%

Source: HTIS 2015

6.23 The main feature that respondents like about Beccles is its attractive environment and good range of non-food shops. Similar to the other town centres, respondents liked that the centre was close their home (i.e. convenient). The ability to find a parking space was also selected as a positive feature, which may reflect the benefits of the large car park serving the Tesco superstore and centre as a whole. However the market was only identified by 2.56% of respondents as a feature people liked about Beccles. This potentially highlights the relatively small size of Beccles market and suggests that more could be made of this key local offer.

6.24 Respondents were also asked what, if anything, respondents would improve in Beccles Town Centre that would encourage them to visit more. The table below provides a summary of the top 15 suggested improvements.

Table 6.4 Key Improvements for Beccles Town Centre

Response	Study Area
Nothing	64.55%
(Don't know)	21.05%
More/better parking	4.84%
More national multiple shops/high street shops	3.09%
Free car parking	1.84%
Other	1.28%
More/better comparison retailers (i.e. non-food shops)	1.67%
Better access by road	0.83%
Better public transport	1.04%
Reduce traffic congestion/improve traffic flow	0.61%
More/better food shops	0.38%
More independent shops	0.21%
If it was closer	0.24%
Cleaner streets	0.14%
More/better places for eating out	0.17%

Source: HTIS 2015

- 6.25 Overall 85.6% of respondents either stated there was '*nothing/very little*' that could be improved, or they could not think of anything. Key improvements identified included provision of more/better car parking, free parking and more high street branded shops, including better comparison retailers. Better access by road and public transport was also identified.

ENVIRONMENTAL QUALITY

- 6.26 Beccles has maintained its historic character and generally the urban realm within the town centre is regarded as being of a very high quality. There were examples of street planting and the High Street was generally clean and well paved. Signage is also good with historic information boards and maps distributed across the centre. The historic nature of a number of the main shop frontages helps to provide an attractive shopping environment. To protect this character a Conservation Area has been designated which contains several listed buildings, including the Grade I Bell Tower.
- 6.27 There is an area of heavy planting with seating located on the corner of Smallgate and New Market, adjacent to Nationwide/Simply Cards. The area around the church on The Walk contributes to the level of green space in the town centre. Beccles is situated along the southern bank of the River Waveney and we consider that more advantages could be taken of this natural asset to increase visitor levels throughout the year.

NEW INVESTMENT AND DEVELOPMENT

- 6.28 The main development and investment in Beccles include the improvements to Beccles Station. Repairs to the building are currently under way and a change of use from A1 to A1 café, B1 office (four offices at first floor level) and D1 studio (one yoga and fitness studio and a small studio to be used by the community) has been granted.

6.29 Elsewhere the former Fibrenyle site occupies a large area of land to the south of Beccles town centre stretching between Gosford Road and Blyburgate. Much of the southern portion of the site is occupied by a Roys of Wroxham store and a Council car park. Only the northern side of the site remains vacant. We consider the development potential of this site to accommodate future needs in more detail in Section 13.

OUT OF CENTRE

6.30 The out of centre offer in Beccles is limited to a Morrisons supermarket (net floorspace of 2,322m²) situated to the north of the town on George Westwood Way. The store has an associated petrol filling station, ATM and café. Also on George Westwood Way, neighbouring the Morrisons site, is discount store B&M Bargains which occupies a large retail warehouse style unit.

SUMMARY

6.31 In summary the town provides a complementary shopping function to the surrounding villages, fulfilling an important role in the retail hierarchy. It has a relatively strong and wide-ranging retail offer, comprising a good mix of national multiples, independent and niche retailers and businesses. The Beales department store, Tesco superstore and other national multiples together have an important anchor role helping to generate shopping trips, footfall and expenditure to the benefit of the town's other shops and services. The key headline findings are as follows:

- The centre has a high number of retail, service and leisure uses for a centre of its size. However unit sizes are generally small.
- The mix of independent shops and cafes provides an offer that serves the daily top-up shopping requirements of local residents and attracts visitors from the surrounding settlements.
- Although the centre has a high proportion of comparison retail and it is the market town with the second highest proportion of comparison units within Waveney District, the centre is under-represented in regards to clothing goods and accessories. In comparison, the smaller town of Southwold has a higher number of clothing stores. Beccles can ensure it competes more effectively against other larger centres if it increases the number of national multiples operating in the town.
- The centre is well-represented with charity shops and is the market town with the highest proportion of these stores throughout the district (9.76%)
- Although there is a relatively weak convenience offer in terms of unit numbers, it has the highest floorspace provision of all the market towns. The town's offer is anchored by the Tesco superstore, along with smaller Co-op and Iceland stores.
- The development of the Tesco store has provided significant new car parking for the town centre, and encouraged footfall and linked trips into the town centre. However there has been a

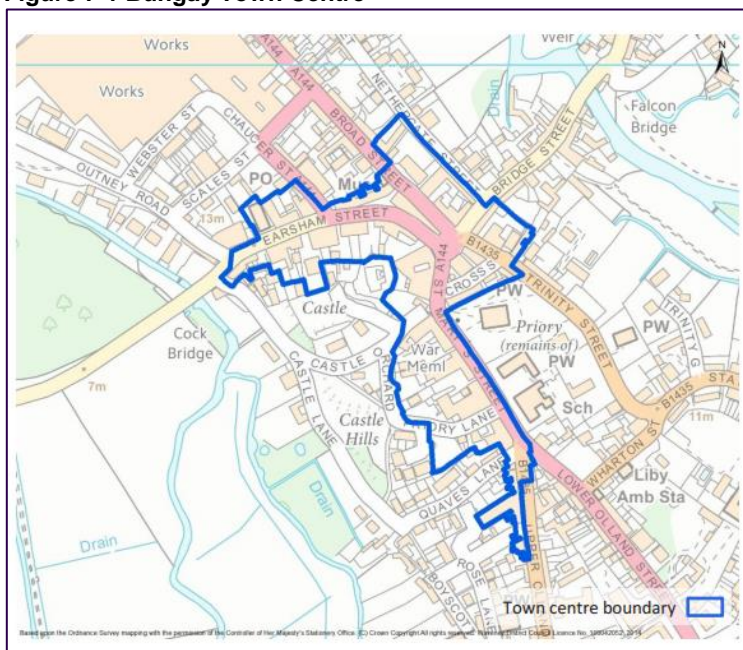
reduction in pedestrian flow along Blyburgate; which is evidence by the concentration of vacancy rates in this area.

- Beccles is overrepresented in terms of financial and professional services with 20.2% of retail, service and leisure outlets being classified under this use.
- The development of hotels should be promoted in order to accommodate higher visitor numbers who often are often unable to find rooms within Beccles during peak times. By developing additional overnight accommodation, the centre will be able to increase its visitor capacity with positive benefits for the daytime and evening economy in terms of an increase in year-round footfall and expenditure.
- The antique market and Christmas events have been shown to be successful in drawing in trade to the area. Events like this should be expanded and promoted to help promote the tourism offer outside of the season.
- There are eight council-run car parks in the town as well as the large Tesco car park which provides three hours free parking. There is a need for additional short stay parking as those making short trips into the centre are parking in the same long-stay car parks as those working in the town.

7 BUNGAY TOWN CENTRE: HEALTH CHECK

- 7.1 Bungay is an old, historic market town, characterised by its historic Castle Bailey. It is slightly larger than Halesworth and Southwold in terms of retail floorspace, and is classified as a 'Smaller Town Centre' in the retail hierarchy in the adopted Core Strategy.
- 7.2 The centre is comprised of St Mary's Street, which joins into Market Place and Earsham Street. The *Town Centre Boundaries Background Paper* shows that the defined town centre comprises most of the town's retail, office and leisure uses. A map of the Town Centre boundary is set out below.

Figure 7-1 Bungay Town Centre



- 7.3 Although there are no allocated primary and secondary frontages, the defined town centre includes the following main shopping streets:

- **Earsham Street** comprises a range of specialist and independent retailers, including antique shops and a wedding dress shop. There is also a range of independent convenience occupiers such as a greengrocer, fishmonger and delicatessen. The shops are high in quality, with attractive historic shopping frontages. However the former large post office unit with prominent frontage is now vacant, along with the former Black Dog Restaurant.
- **Market Place** has successfully retained its Victorian townscape and has a diverse offer of convenience, comparison and service operators. Prominent buildings including the Three Tuns public house. However the Kings Head Hotel is vacant and was looking 'tired' in terms of its appearance and in need of investment. The family run H. Wightman & Son LTD selling home furnishings also occupies a large unit which fronts on to market place. A weekly market is held each Thursday around the central Buttercross in market place.

- **St Mary's Street** includes buildings that are of a distinctive and historic architectural style. It is comprised of a row of shops along the western side of the street. The most prominent buildings include 'The Fleece' public house and the neighbouring building which houses Premier convenience store and Cooper's DIY store on the ground floor retail units. St Mary's Street has a mix of both convenience and comparison offer with occupiers such as Martins, Premier and Bungay Shopper providing for resident's regular top-up shopping needs. In regards to comparison retail, a large factory shop is located on the corner of Priory Lane (previously occupied by Co-op) and there are also charity shops and a number of hot food takeaways. Based on our site visit we noted that a number of shop frontages and upper levels would benefit from new investment/refurbishment.

7.4 There are three annual street markets; a garden market which takes place during spring, a summer antiques market and a Christmas market. The Chair of *Bungay Chamber of Trade* confirmed that all three markets are very popular and help to promote high levels of footfall into the town centre and draw visitors from further afield. It was also stated that tourist numbers were recorded to be higher in 2015 than any previous year.

RETAIL COMPOSITION AND DIVERSITY

7.5 The assessment of the current retail and service provision in Bungay (measured by outlets and floorspace) has been informed by Waveney District Council's *Retail Factsheets* (2006-2015), including their audit conducted in May 2015 and our more recent site visit in November 2015. The table below summarises the change in the composition of retail units and floorspace between 2005 and 2015 as recorded by Waveney District Council.

Table 7.1 Bungay: Changes in Retail Composition by Units and Floorspace, 2006-15

Category	June 2006				May 2015				Change: 2006-15	
	Unit	%	sqm	%	Unit	%	sqm	%	Unit	sqm
A1 Shop	61	62.9%	7,400	59.2%	69	63.3%	9,000	62.9%	+13.1%	+21.6%
A2 Financial, etc.	18	18.6%	2,100	16.8%	19	17.4%	2,200	15.4%	+5.6%	+4.8%
A3 Cafés, etc.	6	6.2%	700	5.6%	9	8.3%	900	6.3%	+50.0%	+28.6%
A4 Drinking, etc	5	5.2%	1,200	9.6%	5	4.6%	1,200	8.4%	0.0%	0.0%
A5 Take-Away	4	4.1%	400	3.2%	4	3.7%	400	2.8%	0.0%	0.0%
D2 Leisure, etc.	1	1.0%	100	0.8%	1	0.9%	100	0.7%	0.0%	0.0%
Sui Generis	2	2.1%	600	4.8%	2	1.8%	500	3.5%	0.0%	-16.7%
TOTAL:	97	100%	12,500	100%	109	100%	14,300	100%	+12.4%	+14.4%

Source: Waveney District Council - *Retail Factsheets* 2006 and 2015

Note: The table only shows provision within the defined town centre boundary

7.6 There are an estimated 109 retail, service and leisure units in Bungay Town Centre trading from a total floorspace of 14,300m². The total provision is higher than for Halesworth and Southwold, but lower than Beccles. When considering all uses in Bungay town centre (including B1 business, B8

storage and distribution, C3 residential and D1 non-residential institutions), the total number of town centre uses increases to 174 units.

- 7.7 As the table shows, there have been a +12.4% increase in the total number of units between 2006 and 2015, and a +14.4% increase in floorspace. This increase is mainly accounted for by a +28.6% increase in restaurant and café floorspace and +21.6% increase in the quantum of Class A1 floorspace.
- 7.8 In terms of comparison goods, Bungay has the lowest proportion of units when compared to the other market towns (56.94%). Within this overall figure, there are six charity shops representing 8.33% of total comparison provision. Only Beccles has a higher proportion of charity shops (9.76%). The proportion of clothing and fashion accessories outlets is relatively low compared to the other market towns. For example, the five clothing stores in the town centre represent 6.94% of total outlets, which is significantly lower than provision in Southwold (26.15%).
- 7.9 Bungay has a relatively good provision of convenience outlets, equivalent to 18.06% of total units (Appendix 6). Only Halesworth has a slightly higher proportion of convenience uses (18.64%). There are two small supermarkets within the town centre (Premier and Bungay Shopper) and these are supported by a range of independent stores including a bakery, confectioners, greengrocers and off licence. There is no anchor foodstore in the town centre.
- 7.10 Bungay's leisure service provision accounts for 17.5% of units. Of this figure, 8.3% are restaurants/cafés and 3.7% are hot-food takeaways. Key gaps in provision include sports and leisure facilities, hotels, nightclubs and bingo halls, none of which are represented in Bungay Town Centre. However, the Fisher Theatre does provide the town with a modern and well-used cultural facility located on Broad Street. Further information is provided in **Section 12** of this report.
- 7.11 There are 19 financial and professional services in the centre, including two banks, estate agents and financial services. This provision is generally in line with the District's other market towns²⁰.
- 7.12 The proportion of service retailers in regards to the total number of class A1 and Sui Generis uses in Bungay town centre is approximately 13.89% This category includes seven hairdresser/barber units, which represents 9.72% of total outlets (see Appendix 6 for detailed table of figures).
- 7.13 The major multiple retailers present in the centre include Boots Pharmacy store. Other convenience multiples include McColl's, Premier and Martins. Sue Ryder, RSPCA and St Elizabeth Hospice are examples of multiple charity shops.

²⁰ It should be noted that this total number of financial and professional units recorded by the Council includes two beauty salons which are now classified as Sui Generis. If these uses are subtracted from the Council's figure it results in a total of 17 financial and professional services.

VACANCY LEVELS

- 7.14 Vacancy levels provide one of the key performance indicators (KPIs) for assessing the relative health of centres, and measuring how their attraction and performance may be changing over time. However, vacancy data should be treated with caution as they can represent only the current status of units and do not reflect the ongoing changes within a centre.
- 7.15 In this case we have drawn on the vacancy levels identified by the Council's *Retail Factsheets*. The Council recorded 13 vacant units in the town centre in May 2015 (Table 1, Appendix 6). This is equivalent to a vacancy rate of 11.9% and is slightly above the national average for all centres recorded by Experian of 11.4%. Of these recorded vacancies, one of the units was previously a high street bank (Natwest). Between 2006 and 2015, the number of vacant units has increased from 11 to 13 (+18.2%).
- 7.16 On the day of our visit to Bungay we recorded a slightly higher number of vacant units (15). The vacancies are dispersed around the areas of St Mary's Street, Market Place and Broad Street and there is no significant cluster of vacancies. However, a large vacant public house is situated on the corner of Market Place and the recently vacant Barclays bank and Post Office units are situated in close proximity on Broad Street.

RETAILER REQUIREMENTS

- 7.17 Retailer demand for representation in a shopping location normally provides a good indication of a centre's overall attraction, health and viability. The *CoStar Focus* national retailer requirements database is a standard published dataset used to inform retail assessments and provides consistently sourced evidence detailing the changes in retailer requirements over a period of time.
- 7.18 The latest CoStar data indicates requirements from St Elizabeth Hospice (charity shop) for 325m² in the town centre. Notwithstanding this limited demand, many retailers prefer not to publish their requirements as it can damage their negotiating position where seeking representation in new locations. Moreover, such databases can only identify the current level of market demand and do not reflect how demand might change in the future following new development and investment. For example experience shows that a new scheme that offers retailers and commercial leisure operators modern, well-configured floorspace adjacent to like-minded tenants in a prominent location will generally generate a significant uplift in market interest and demand.

ACCESSIBILITY & PEDESTRIAN FLOWS

- 7.19 The town centre is well served by bus and there are a number of routes that run through the centre linking it with the surrounding area, including Norwich. However, we understand that there is no direct bus service to the hospital, which does represent a significant gap in provision. Although it is possible to travel to both Diss and Beccles railway stations, we understand that the public transport

services are not necessarily integrated and buses can often arrive at the stations after the trains have departed.

7.20 By road, the A143 provides links to Lowestoft and Beccles from the north of the centre. The A144 runs through the centre and links to Halesworth to the south. A lack of parking provision is understood to be a problem despite there being five council-run car parks in the town. The table below shows all the council car parks in the town.

Table 7.3 Council-run car parks in Bungay

Car Park	Number of Spaces	Short Stay/Long Stay
Boyscott Lane Free Parking	10	Long Stay
Priory Lane Pay and Display	52	Long Stay
Wharton Street Pay and Display	50	Long Stay
Bridge Street Free Parking	12	Long Stay
Scales Street Pay and Display	48	Long Stay

Source: Waveney District Council- Car Park Directory

7.21 The Scales Street, Priory Lane and Wharton Street car parks currently offer one-hour free parking; however we understand this is due to end. We were informed by our stakeholder contact in Bungay that since the introduction of the one-hour free parking provision, the increase in ‘*button presses*’ for access to the car park has risen by 5,000 per month. Notwithstanding this, it is recognised that parking charges across the town are already at a low rate. The land next to the southern perimeter wall in St Mary’s churchyard has been identified as a potential site that could be developed to help relieve parking pressure. We also understand that resident parking permit charges are not equal across the town, with prices ranging from £150 to £350 per annum.

7.22 In 2013, over £500,000 was spent on the *Town Centre Enhancement Scheme* to create a one way system along St Mary’s Street. County Council funding supported this scheme and it has been successful in helping traffic flow to a single file along the northbound route, enhancing the pedestrian experience on St Mary’s Street; with southbound traffic being diverted via Trinity Street and Wharton Street.

7.23 In terms of footfall, pedestrian flows are strong throughout the town centre, but we noted on our site visit that they were most buoyant around Market Place and St Mary’s Street.

CUSTOMER VIEWS AND PERCEPTIONS

7.24 The household telephone interview survey asked specific questions on respondents’ views and perceptions of Bungay Town Centre as a place to shop and visit for a wide range of uses and attractions. This included identifying key improvements that might encourage people to visit the town more often for shopping and other purposes. The survey results identified the ‘top 15’ features that people like about the town.

Table 7.4 Features respondents liked most about Bungay Town Centre

Response	Study Area
Attractive environment/ nice place	25.48%
Nothing/very little	16.66%
Good range of non-food shops	12.53%
Close to home	11.16%
Traditional	11.33%
Other	9.51%
Good pubs, cafes or restaurants	5.46%
Easy to park	3.64%
Close to friends or relatives	2.85%
Compact	2.98%
Makes a change from other places	3.30%
Quiet	2.64%
Good range/quality of independent shops	2.91%
Market	2.52%
Sew and So's fabric shop	1.97%

Source: HTIS 2015

7.25 As for Waveney's other centres, a key attraction for respondents who visit Bungay Town Centre is its proximity ('convenience') to their home. Respondents like Bungay's attractive environment, good range of non-food shops and traditional character. These responses confirm the findings of the health check and site visits, and highlight some of the key historical/traditional features that can help Bungay to differentiate itself from the larger centres outside of the District.

7.26 Respondents were also asked what improvements to the town centre would encourage them to visit more often. The 'top 15' responses were as follows:

Table 7.5 Bungay Town Centre: Key Improvements

Response	Study Area
Nothing (Don't know)	57.27%
More national multiple/high street shops	29.88%
More/better parking	5.50%
More/better food shops	2.31%
More/better comparison retailers	2.46%
Other	1.27%
Free car parking	0.99%
Better access by road	0.64%
Reduce traffic congestion/improve traffic flow	0.69%
Better public transport	0.54%
A complete revamp	0.71%
More/better financial services (banks, building societies)	0.30%
More/better places for eating out	0.33%
More/better pedestrianised streets	0.35%
	0.08%

Source: HTIS 2015

7.27 The majority in each zone stated '*nothing/don't know*' (87.15% across the whole study area). Key improvements included provision of more high street branded shops and better comparison retailers. This 'gap' in high street brands was also identified by the health check and site visits. Respondents

also identified a need for more/better parking, free car parking spaces and better public transport. These issues were also identified by the health checks, site visits and stakeholder consultation.

ENVIRONMENTAL QUALITY

- 7.28 The Victorian architecture and historic character contributes to the high quality of Bungay's townscape. Earsham Street in particular is attractive and appears to be well maintained and managed. However a number of shop frontages within Market Place and St Mary's Street would benefit from investment/refurbishment. The vacant Kings Head is an example of a building which is in need of repair and it is important that some of the key vacant units (principally the larger post office, Natwest and Barclays units) are occupied within a reasonable period and are well-maintained. There are also attractive alleyways leading off the main streets which provide areas of interest for visitors.
- 7.29 The recent one-way system installed along St Mary's Street means that pedestrians can now enjoy a safer environment when using the town centre. Signage throughout the centre for pedestrians, particularly tourists, is good. Information boards displaying key historic and attraction information are distributed across Bungay town centre. A Bungay Castle visitor centre is also operating next to the Castle Bailey.
- 7.30 The level of visible green space in the town centre is high. The Grade I listed Castle Bailey is located on Castle Orchard behind Earsham Street and is surrounded by green open space which is popular with dog walkers and is used for events throughout the year. During July there is a month long festival and many of the events are held around the castle bailey area, including an annual summer ball. However as the bailey is a historic site, organisers have been informed that marquee guy ropes are no longer permitted in the ground so alternative sites are currently being looked into.

NEW INVESTMENT AND POTENTIAL DEVELOPMENT

- 7.31 Apart from the £500,000 spent on the *Town Centre Enhancement Scheme* in 2013 we are not aware of any significant new investments planned and/or proposed for Bungay Town Centre.

OUT OF CENTRE

- 7.32 Co-op is the only out-of-centre store that serves Bungay, located on Hillside Road East, approximately one mile from the town centre. Pedestrian linkages between the town and the store are poor and it is predominately accessed by car. The store facilities include a petrol filling station, café and cash machine. The store stocks approximately 10-15% non-food goods and there are eight checkouts. At the time of our visit, the car park was nearly at full capacity.

SUMMARY

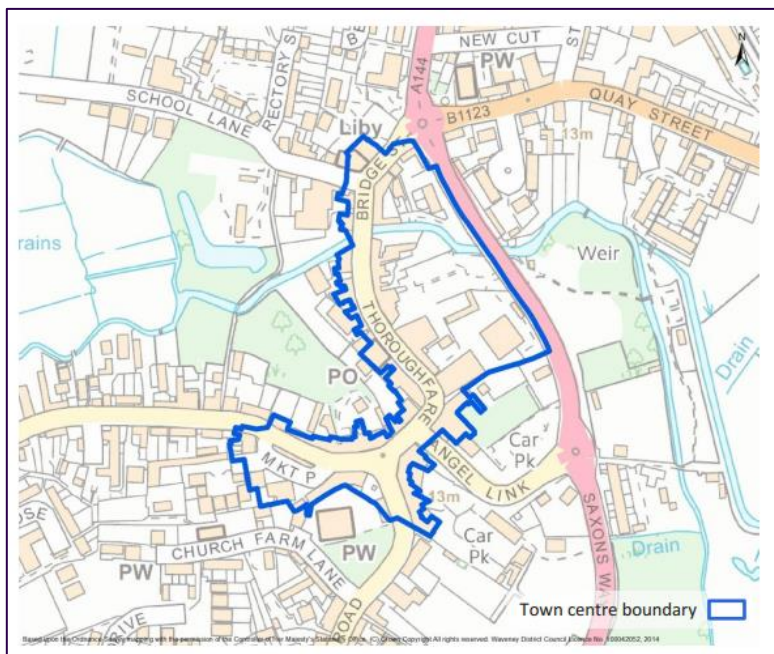
7.33 The health check has identified that Bungay has a number of strengths and weaknesses, and there are some opportunities for new investment and development to help improve the town's overall vitality and viability. The headline findings include the following:

- The one-way system along St Mary's Street has been successful and pedestrians now enjoy a safer environment when using the town centre.
- The comparison offer in Bungay is low. It has the smallest proportion of comparison units compared to the District's other three market towns. The comparison offer available is focused on home furnishings and charity shops. Independent retail dominates the provision, particularly along Earsham Street.
- There is only one 'major retailer' within the town centre (Boots). Increasing this offer could enable Beccles to compete with other centres in and outside of the district, subject to market interest and demand.
- The town centre has a strong convenience offer with two larger convenience stores (Primer and Bungay Shopper) supplemented by local independent convenience stores.
- The annual street markets are all popular and encourage high levels of footfall into the town centre. There would appear to be scope to expand annual events, including the summer festival, to help increase visitor numbers.
- Bungay has a relatively good provision of open green space, particularly near to the Castle Bailey site. These areas should be utilised for events and activities to support the town centre in increasing tourist numbers.
- The vacancy rate is slightly above the UK average. There are a number of large vacant units including the post office and the Kings Head Hotel.
- There is considered to be a shortage of parking provision in the town centre. Free parking has encouraged trips into the town centre and the use of these car parks.

8 HALESWORTH TOWN CENTRE: HEALTH CHECK

- 8.1 Halesworth is a historic market town that predominately serves its rural hinterland catchment population. The adopted Waveney Core Strategy classifies Halesworth as a ‘*Smaller Town Centre*’, at the same level in the retail hierarchy as Bungay and Southwold.
- 8.2 The town centre boundary is compact with no designated primary shopping area or primary and secondary frontages. According to the 2006 study, this is a result of the sporadic distribution of the national multiple retailers across the centre. The boundary includes the pedestrianised Thoroughfare which is the main focus for town centre uses, Bridge Street to the north of Thoroughfare and Market Place. A map of the Town Centre boundary is set out in figure below:

Figure 8-1 Halesworth Town Centre



- 8.3 Although there are no allocated primary and secondary frontages, the defined town centre as set out above includes the following shopping streets:

- **Thoroughfare** is a linear high street with smaller units and traditional shop frontages. The pedestrianisation of this street creates a safe and pleasant shopping environment. The historic Thoroughfare has a strong character with a variety of prominent buildings. It is characterised by independent retailers and some multiple representation (including Boots, Spar and various charity shops). There are also a number of service occupiers including hairdressers, estate agents, banks and building societies. There is a large vacant unit that HSBC previously occupied on the corner of the Thoroughfare (unit 47) leading into Market Place.

- **Market Place** is located to the southern end of the Thoroughfare and includes a small/medium space in front of *Tilly's of Halesworth* where markets are held every Wednesday. The site visit was conducted on a market day and it was observed to take up much of the space of the market square, selling a variety of goods. There are a limited number of convenience occupants within the market place units and the majority of occupants are independents. Market Place is easily accessed and is generally well-linked to the Thoroughfare.
- **Bridge Street** follows on from Thoroughfare and is partly pedestrianised until the street divides into Bridge Street and Rectory Street at the junction to the end of the Thoroughfare on which the County Library hinges around. There are a small number of shops on the adjacent side of the street. although retail provision here is limited.

RETAIL COMPOSITION AND DIVERSITY

8.4 The assessment of the current retail and service provision in Halesworth (measured by outlets and floorspace) has been informed by Waveney District Council's *Retail Factsheets* (2006-2015), supplemented by their audit conducted by the Council in May 2015 and our own audit in November 2015. The table below shows the changes in the distribution of retail units and floorspace between 2006 and 2015.

Table 8.1 Halesworth: Retail Composition by Units and Floorspace, 2006-2015

Category	June 2006				May 2015				Change: 2006-15	
	Unit	%	sqm	%	Unit	%	sqm	%	Unit	sqm
A1 Shop	60	63.8%	6,500	61.3%	57	62.0%	6,100	58.1%	-5.0%	-6.2%
A2 Financial, etc.	20	21.3%	2,200	20.8%	19	20.7%	2,300	21.9%	-5.0%	4.5%
A3 Cafés, etc.	5	5.3%	600	5.7%	7	7.6%	800	7.6%	40.0%	33.3%
A4 Drinking, etc	3	3.2%	700	6.6%	2	2.2%	700	6.7%	-33.3%	0.0%
A5 Take-Away	3	3.2%	200	1.9%	3	3.3%	200	1.9%	0.0%	0.0%
D2 Leisure, etc.	1	1.1%	200	1.9%	1	1.1%	200	1.9%	0.0%	0.0%
Sui Generis	2	2.1%	200	1.9%	3	3.3%	200	1.9%	50.0%	0.0%
TOTAL:	94	100%	10,600	100%	92	100%	10,500	100%	-2.1%	-0.9%

Source: Waveney District Council - *Retail Factsheets* 2006 and 2015

Note: The Co-op at Saxon Way is not included in the defined Town Centre Boundary

8.5 There are 92 retail, leisure and service units in Halesworth Town Centre, trading from a total floorspace of 10,500m². It total provision is higher than for Southwold (76 units), but lower than for Beccles (183) and Bungay (109). When considering all uses in Halesworth town centre (including C3 residential and D1 non-residential institutions), this figure increases to 108 units.

8.6 As the table shows there has been limited change in provision between 2006 and 2015. The key positive trend identified is a 40% increase in the number of restaurant and cafés (an increase from five to seven units). Although Class A3 uses now represent 7.6% of all retail, service and leisure uses in the town centre, this is still below the provision in Southwold (10.5%) and Bungay (8.3%).

The table also shows a fall in Class A1, A2 and A4 units. In terms of the slight fall in the number of financial and professional businesses (from 20 to 19 units following the closure of a HSBC branch), current provision of 20.7% of units is still above the UK average of 10.8%.

- 8.7 Halesworth has a good provision of comparison units and floorspace. It has the highest proportion of art and craft shops (8.47% of all class A1 uses) compared to the District's other market towns. The centre also has a high proportion of antiques and second hand goods stores (6.78%), with only Southwold having a marginally higher proportion than this (7.69%). This reflects the specialist and independent nature of the retail within Halesworth.
- 8.8 The provision of convenience outlets in Halesworth (18.64% of total outlets) is the highest of all the centres in Waveney District. Although there is only one small SPAR supermarket in the town centre, there are many complementary independent retailers including a bakery, butchers and two greengrocers. It should be noted that the out-of-centre Co-op supermarket has not been included within the list of town centre uses.
- 8.9 Leisure service provision is below UK averages; 14.2% of units compared to 22.5% nationally. Key gaps include sports and leisure facilities, night clubs and bingo halls, none of which are represented in Halesworth. Further information is provided in Section 12 of this report.
- 8.10 In terms of major retailers, there is only one 'mixed goods retailer' (Boots). Other national multiple retailers include the Spar convenience store and Co-Op. There is a lack of major retailers which reflects Halesworth's historic and traditional retail offer.
- 8.11 There are currently no retailer requirements listed for Halesworth Town Centre.

VACANCY LEVELS

- 8.12 Vacancy levels provide one of the key performance indicators (KPIs) for assessing the relative health of centres, and measuring how their attraction and performance may be changing over time. However, vacancy data should be treated with caution as they can represent only the current status of units and do not reflect the ongoing changes within a centre. In this case we have drawn on the vacancy levels shown in the Council's 2015 *Retail Factsheet*. This indicated that there were five vacant units in May 2015. This was equivalent to a vacancy level of 5.4%, which is significantly below the national average for all centres recorded by Experian of 11.4% and below the vacancy rate recorded for Bungay (11.9%). Of these vacancies, one of the units was a high street bank (HSBC located on the Thoroughfare). During our visit to Halesworth in November 2015, we also recorded five vacant units in the town centre which is in line with the Council's May 2015 figure. Despite this low vacancy rate, the number of vacant units has risen (from two to five units).

ACCESSIBILITY & PEDESTRIAN FLOWS

- 8.13 Halesworth is well connected by road and by public transport routes to its local resident population and the wider District area and beyond. The railway station is situated only 300 metres from the main town centre and there are regular services to both Ipswich and Norwich. The town centre is also easily accessible by bus.
- 8.14 By road, the A144 passes through the town centre and links to the A12 to the south to Ipswich and to the B1332 to the north to Norwich. As the table below shows there are six Council-run car parks in Halesworth, most of which are in close proximity to, or are within the town centre. The Thoroughfare long and short stay car parks provide free parking for the first hour, although we understand that this initiative is soon to end and free parking will no longer be available.

Table 8.2 Council-run car parks in Halesworth

Car Park	Number of Spaces	Short Stay/Long Stay
Angel Lane North Pay and Display	80	Long Stay
Angel Lane South Pay and Display	46	Long Stay
Post office	25	Long Stay
Station Road Pay and Display	25	Long Stay
Thoroughfare Pay and Display	108	Short Stay
Thoroughfare Extension Pay and Display	n/a	Long Stay

Source: Waveney District Council- Car Park Directory

- 8.15 In terms of footfall, our visual inspections (November 2015) identified that pedestrian flows were strongest along the Thoroughfare, which benefits from direct access from the car park, and were weaker towards the southern end of the Thoroughfare, around Market Place.

CUSTOMER VIEWS AND PERCEPTIONS

- 8.16 The household telephone interview survey asked specific questions on respondents' views and perceptions of Halesworth Town Centre as a place to shop and visit for a wide range of uses and attractions. This included identifying key improvements that might encourage people to visit the town more often for shopping and other purposes.
- 8.17 The survey results identified the 'top 15' features that people like most about Halesworth Town Centre.
- 8.18 A key attraction for respondents is the town's proximity to their home, and/or to friends and relatives. Respondents also liked Halesworth's range of non-food shops, the attractive environment and the traditional nature of the centre. The provision of one-hour free parking and the traffic free shopping area were also popular. These responses confirm the findings of the health check and site visits.

Table 8.3 Features respondents liked about Halesworth Town Centre

Response	Study Area
Attractive environment / nice place	19.16%
Good range of non-food shops	18.15%
Close to home	16.50%
Nothing / very little	11.74%
Traditional	7.93%
Traffic free shopping centre	6.63%
Good range / quality of independent shops	5.70%
Easy to park	5.34%
Other	4.30%
Compact	4.23%
(Don't know)	4.16%
Makes a change from other places	3.68%
Free one-hour parking	3.67%
Quiet	6.09%
Close to friends or relatives	3.47%

Source: HTIS 2015

8.19 Respondents were also asked what improvements to the town centre, if anything, would encourage them to visit more often. The 'top 15' responses were as follows:

Table 8.4 Key Improvements for Halesworth Town Centre

Response	Study Area
Nothing	62.04%
(Don't know)	30.80%
Other	1.36%
More national multiple shops / High Street shops	1.72%
More / better comparison retailers (i.e. non-food shops)	1.33%
More / better food shops	1.43%
Free car parking	0.84%
More / better parking	0.67%
More independent shops	0.31%
More / better services	0.25%
Better public transport	0.27%
More / better places for eating out (e.g. cafés and restaurants)	0.18%
More / better entertainment	0.07%
More / better seats / flower displays	0.08%
More / better public conveniences	0.07%

Source: HTIS 2015

8.20 The majority in each zone stated '*nothing or very little*' or '*don't know*' (92.84% across the whole Study Area). Key improvements included provision of more high street branded shops and better comparison retailers. This 'gap' in high street brands was also identified by the health check and site visits. Respondents also identified improvements to the food store provision and free car parking (the one hour free parking is due to end soon), or more/ better car parking in the town centre.

ENVIRONMENTAL QUALITY

- 8.21 The town centre shopping area is compact and the majority of the buildings are historic and listed, covered by a Conservation Area. Halesworth's environment also benefits from the attractive pedestrianised Thoroughfare, which allows visitors to experience a safe, traffic-free environment.
- 8.22 The quality of the town's public realm is generally good, with an adequate supply of street furniture (including benches, litter bins and street lighting). There is also a good supply of street planting which further enhances the pedestrian experience. There is also good signage.
- 8.23 There is an adequate level of visible green space in the town centre. There is an area of well-maintained open space which is heavily planted by the church and also by Angel Link. The town park is located only a short walk away from the town centre.

NEW INVESTMENT AND POTENTIAL DEVELOPMENT

- 8.24 There have been various new investments planned and/or proposed for Halesworth Town Centre over recent years, including:
- The '**Thoroughfare site**' is located on land between Thoroughfare and Saxons Way, within easy walking distance of the main shopping street. There is a council-owned car park to the north of the site and the southern part of the site comprises numerous businesses with associated car parking. The site was the subject of a planning permission for a supermarket granted on appeal in 2002. Although not allocated for retail this site was identified by the current local plan as the favoured location for new retail development in Halesworth. This permission has been kept alive by approval of a reserved matters application which has not yet been decided.
 - Tesco Stores Limited also submitted an application for a new supermarket with a gross floor area of 3,327m² and a sales area of 2,044m² on the **Dairy Farm Site**. The site is located approximately 200m from Halesworth town centre and the site is accessible by vehicle by Angel Link. However this was dismissed on appeal in 2010. This site is allocated for housing provision and community services provision in the Site Specific Allocations Development Plan Document adopted in January 2011.
- 8.25 We consider the development potential of the Thoroughfare site in more detail in Section 13.

OUT OF CENTRE

- 8.26 In terms of provision outside the town centre there is a Co-op supermarket at Saxon Way that serves the population of Halesworth and benefits from relative good accessibility to the rest of the town centre. It comprises a gross floor area of 1,858m² and a sales area of approximately 1,240m². There is a limited non-food sales area and it is served by 173 parking spaces and a petrol filling station. An application was submitted for an extension, including the demolition of existing petrol filling station

which went to appeal for non-determination of application. However this was withdrawn in March 2010. An additional application was submitted following this which was also withdrawn in October 2010.

SUMMARY

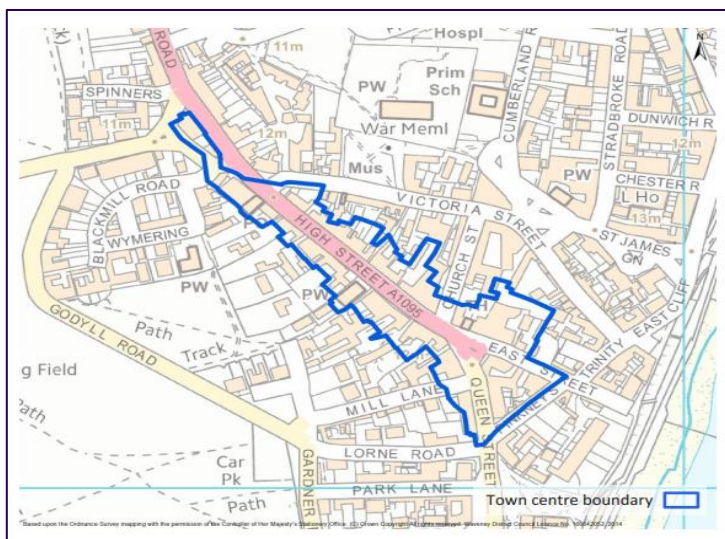
8.27 The health check has identified that Halesworth has a number of strengths and weaknesses, and there are some opportunities for new investment and development to help improve the town's overall vitality and viability. The key headline findings are as follows:

- Halesworth benefits from a pedestrianised high street (Thoroughfare). This allows visitors to experience a safe and traffic-free shopping environment.
- Its comparison offer is focussed on arts and crafts and antiques and second hand goods. There are only a handful of major multiple retailers in the defined town centre boundary (principally Boots and Spar).
- The centre has the highest proportion of convenience units compared with all the District's market towns, comprising the small Spar store and a range of independent convenience retailers.
- A weekly market operates in the centre. However the open space in the market square is small and the centre may benefit from the expansion of this market to draw in visitors from a wide area as the number of stalls is currently limited.
- The Market Place is easily accessed and well-linked by the Thoroughfare.
- Vacancy rates across the town centre are low at 5.4%. Large vacant units include the former building which HSBC occupied at 47 Thoroughfare.
- There are six council-run car parks in Halesworth and one hour free parking is currently provided at the Thoroughfare car park however this is due to end soon.

9 SOUTHWOLD TOWN CENTRE: HEALTH CHECK

- 9.1 Southwold is a Heritage Coast seaside resort situated in the *Suffolk Coast and Heaths AONB*. It is a successful and thriving area, underpinned by its tourism and visitor businesses and the growth of holiday properties in and around the town. Although the smallest of the market towns in terms of retail floorspace, the centre has developed a unique shopping role because of its location and specialist offer catering predominantly for the tourist and visitor markets.
- 9.2 The centre's retail offer is focussed along the linear High Street and Market Place where it forks into East Street and Queen Street, joining together on Pinkey's Lane. As the figure below shows the town centre boundary includes the length of the High Street, Market Place and sections of East Street and Queens Street. The boundary is very tightly drawn and does not include the entire length of East Street and Queens Street on which two public houses (Red Lion and Lord Nelson) are situated towards the sea front. The Adnams Wine Cellar and Kitchen Store (and instore café) located on Victoria Street is also not included within the boundary. Given that this is one of Southwold's key attractions we nevertheless advise that it should be included within the defined PSA and Town Centre boundary (see Section 14).

Figure 9-1 **Southwold Town Centre**



- 9.3 Although there is no allocated primary shopping area in Southwold, the town's retail offer is mainly concentrated along the following shopping streets:
- The **High Street** offers a mix of retail and leisure uses. Units are generally small with historic shop fronts which complement the specialist and independent nature of the retailers. The buildings and shop frontages are all of a good quality and make a significant contribution to Southwold's overall character and attraction, and its important role as a tourist destination. Restaurants and banks/building societies occupy the few larger units along the street. A Co-op

store provides the main convenience offer along the High Street and anchors the retail provision in the centre. The store is complemented by a range of other convenience stores along the High Street and the rest of the centre.

- **Market Place** offers an area of public open space that is set aside for weekly markets and annual events. However the market currently operating is small with only a handful of stores and the space here is not large enough for this to extend. There is a market every Monday and Thursday and in winter a Christmas market takes place during the Christmas light switch on. The Grade II listed Swan Hotel dominates the market place.
- The retail offer becomes increasingly sparse as the **Market Place** divides into East Street with a concentration of residential properties lining one side of the street. The narrow roads and coloured houses characterise the street. Occupiers consist of two clothing stores, including the multiple retailer Joules store, a delicatessen and charity shop.
- **Queen Street** is the other division from the Market Place and is characterised by its narrow street and historic shop fronts. Occupiers to the southern end of the street appear to have a noticeably lower footfall, possibly due to the specialist nature of them (occupants include a chemist, art gallery, estate agent and confectioners). However the Tesco Express at the northern end of the street, towards the Market Place, encourages footfall around this area. Having this store in close proximity to the Co-op on the High Street provides a level of healthy competition and again, helps to anchor the retail provision in the two locations.

9.4 The town's units are predominately occupied by independent and specialist retailers, many of which appeal to the tourist and visitor market. The centre also has art galleries and antique stores which encourages visitors. Together with a variety of restaurants, public houses and a full provision of facilities, the town manages to serve both local residents and visitors. Although there is a strong provision of independent retailers, there is a selection of quality multiple clothing retailers within the town centre (i.e. Jack Wills, Joules and Fat Face).

9.5 We were informed by the Chair of *Southwold Chamber of Trade* that the tourist/visitor season extends to approximately 35 weeks. This is based on the operation of holiday properties. However the most popular properties tend to be used for around 45 weeks of the year. There are high levels of trade throughout the year and only a very small handful of businesses close during the winter months (including the Havaianas shoe store located on the High Street). Following on from the school holidays, the autumn months become popular with couples and those of retirement age. The town is also busy during Christmas and the New Year.

RETAIL COMPOSITION AND DIVERSITY

9.6 The assessment of the current retail and service provision in Halesworth (measured by outlets and floorspace) has been informed by Waveney District Council's *Retail Factsheets* (2006-2015),

including their audit conducted in May 2015, along with our site visit in November 2015. The table below summarises the changes in the composition of retail units and floorspace between 2006 and 2015 as recorded by Waveney District Council. .

Table 9.1 Southwold: Changes in Retail Composition by Units and Floorspace, 2006- 15

Category	June 2006				May 2015				Change: 2006-15	
	Unit	%	sqm	%	Unit	%	sqm	%	Unit	sqm
A1 Shop	51	70.8%	4,900	62.0%	53	69.7%	5,400	71.1%	+3.8%	+10.2%
A2 Financial, etc.	10	13.9%	900	11.4%	12	15.8%	1,000	13.2%	+20.0%	+11.1%
A3 Cafés, etc.	7	9.7%	700	8.9%	8	10.5%	700	9.2%	+14.3%	0.0%
A4 Drinking, etc	2	2.8%	1,200	15.2%	1	1.3%	300	3.9%	-50.0%	-75.0%
A5 Take-Away	1	1.4%	100	1.3%	1	1.3%	100	1.3%	0.0%	0.0%
Sui Generis	1	1.4%	100	1.3%	1	1.3%	100	1.3%	0.0%	0.0%
TOTAL:	72	100%	7,900	100%	76	100%	7,600	100%	+5.6%	-3.8%

Source: Waveney District Council - *Retail Factsheets* 2006 and 2015

Note: The table only shows provision within the defined town centre boundary

- 9.7 There are 72 retail, service and leisure use units in Southwold Town Centre, trading from a total floorspace of 7,600m². This is significantly lower than the other market towns including Halesworth (10,500m²).
- 9.8 As the table shows there has been limited change in Southwold's retail, service and leisure provision since 2015. The key trends include a 5.6% increase in the number of units from 72 to 76; a reduction in the number of drinking establishments (from two to one); and a 20% increase in the number of financial and professional service units (from ten to twelve units).
- 9.9 In terms of its comparison shopping, Southwold has an excellent provision benchmarked against the other market towns. As the table in **Appendix 6** shows, comparison goods represent 69.23% of all Class A1 and Sui Generis uses in the town centre which is higher than for the District's other centres. Within this overall figure, 26.15% are classified as clothing and fashion accessory stores, which is just under three times higher than for Beccles; the town with the second highest provision. There are also a high proportion of art/craft shops (7.69%) and antique/second hand good stores (7.69%). This reflects the specialist nature of Southwold's retail provision, catering for its wider tourist and visitor market. There are also only three charity shops in the centre (4.62%).
- 9.10 The centre's 11 convenience outlets represent 16.92% of all Class A1 and Sui Generis uses. This is only slightly lower than Halesworth (18.64%) and Bungay (18.06%). There are two small supermarkets, a Tesco Express and Co-op which are supported by a range of independent convenience occupants (including a bakery, delicatessen and butchers).
- 9.11 There are five service retailers which represent some 7.69% of total units. This category includes three hairdresser/barber units, one opticians and one post office. Southwold's proportion of service

retailers is the lowest for the District's market towns, which suggests that there could be potential to expand on this offer to ensure that the day-to-day needs of the catchment population are catered for.

- 9.12 Major multiple retailers in the centre include WH Smith, Tesco, Co-op, Fat Face, Joules, Crew Clothing and Jack Wills. Although the majority of the retailers are independent, the presence of national multiples in the centre reflects the health of the centre and the interest from national retailers. The presence of national multiple outlets will also help to enhance the appeal of the centre to local customers and to the town's wider tourist/visitor market.
- 9.13 The provision of financial and professional services in the centre is the lowest of all the District's market towns but is still considered to be quite high (15.8% of units). Provision includes four estate agencies and four high street banks.
- 9.14 Leisure service provision equates to 13.1% of all retail, leisure and service units. There are eight restaurants/café's in the defined town centre boundary, equivalent to 10.5% of all retail, service and leisure uses. The Council's audit confirms that Southwold has the highest provision of Class A3 use when compared to the other market towns in the District. Key gaps in leisure provision include drinking establishments, as there is currently only one within the town centre boundary. However it should be noted that there are additional drinking establishments outside of the defined boundary, including on East Street and Queens Street. There is also a cinema (Electric Picture Palace) located on Blackmill Road, just off the north of the High Street, which is also not included within the town centre boundary. There are no night clubs and bingo halls in the centre.

VACANCY LEVELS

- 9.15 Vacancy levels provide one of the key performance indicators (KPIs) for assessing the relative health of centres, and measuring how their attraction and performance may be changing over time. Vacancy data should be treated with caution as they can represent only the current status of units and do not reflect the ongoing changes within a centre. In this case we have drawn on the vacancy levels identified by the Council's *Retail Factsheets*. The Council recorded only four vacant units in the town centre in May 2015. This is equivalent to a vacancy level of 5.3%, which is significantly below the national average for all centres recorded by Experian of 11.4%. Of these recorded vacancies, one was a public house located on the northern edge of the High Street towards Station Road. The remaining vacant units are located to the south around the Market Place, Queen Street and East Street. Our November 2015 site visit identified not change in the number of vacant units.

RETAILER REQUIREMENTS

- 9.16 Retailer demand for representation in a shopping location normally provides a good indication of a centre's overall attraction, health and viability. The *CoStar Focus* national retailer requirements database is a standard published dataset used to inform retail assessments and provides consistently sourced evidence detailing the changes in retailer requirements over a period of time.

As the table below shows, there were five published requirements for Southwold Town Centre in November 2015. There is relatively good demand from both retailers and leisure operators; including Wildwood Pizzeria, Phase Eight and a charity shop. There is also a requirement for Café Nero.

Table 9.2 Southwold: Retailer Requirements

Category	Name	Max floorspace (m2)
Retail	St Elizabeth Hospice	325
	Moshulu	93
	Phase Eight	186
Leisure	Wildwood	279
	Café Nero	139

Source: Costar FOUCS (March 2015)

9.17 Notwithstanding this, many retailers prefer not to publish their requirements as it can damage their negotiating position where seeking representation in new locations. Moreover, such databases can only identify the current level of market demand and do not reflect how demand might change in the future following new development and investment. For example experience shows that a new scheme that offers retailers and commercial leisure operators modern, well-configured floorspace adjacent to like-minded tenants in a prominent location will generally generate a significant uplift in market interest and demand.

ACCESSIBILITY & PEDESTRIAN FLOWS

9.18 Southwold benefits from relatively easy and quick access to Lowestoft and Halesworth via the A1095, B1127 and A12. As the table below shows there are five Council-run car parks located across Southwold.

Table 9.3 Council-run car parks in Southwold

Car Park	Number of Spaces	Short Stay/Long Stay
Ferry Road Free Parking	60	Long Stay
Market Place Free Parking	6	Short Stay
Pier Pay and Display	345	Long Stay
Harbour Pay and Display	300	Long Stay
Pier Coach Park	n/a	Long Stay

Source: Waveney District Council- Car Park Directory

9.19 The main car park operating a pay-and-display system is located just north of the Pier and can accommodate around 345 cars with overspill parking opening up during peak times. Additionally, there is a designated Pier Coach Park. There are also two car parks along Ferry Road (capacity for 60 and 300 cars) to the south of the town but this is around a twenty minute walk from the main town centre and is not convenient for either visitors or residents who are using the centre. Free parking is available at the Common by the water tower and along the High Street and market square during non-market days.

- 9.20 However during the summer months the town’s car parks are at full capacity levels and there is a shortage of convenient spaces. We understand that this can deter people from visiting the centre during peak times. Furthermore, visitors often tend to park along the roadside where they do not have permission; this is unsafe and causes hazards for both other car users and pedestrians. Improving accessibility and parking provision is therefore essential to a town centre that has such a high tourist trade.
- 9.21 Southwold is not served by a railway station and those visiting by rail have to use the nearby stations of either Halesworth or Darsham. Bus routes provide links to the competing centres of Norwich, Ipswich and Lowestoft and the other district market towns pass regularly through the centre. Being in fairly close proximity to London also contributes to high year round visitor numbers in the town.
- 9.22 In terms of footfall, on the day of our visit pedestrian flows were generally high across the whole centre. However there was a lower flow of pedestrians along Queen Street, particularly towards the southern end of the street. There was a significantly higher concentration of pedestrians around the Co-op store.

CUSTOMER VIEWS AND PERCEPTIONS

- 9.23 The household telephone interview survey asked specific questions on respondents’ views and perceptions of Southwold Town Centre as a place to shop and visit for a wide range of uses and attractions. This included identifying key improvements that might encourage people to visit the town more often for shopping and other purposes. The survey results identified the ‘top 15’ features that people like most about Southwold Town Centre.

Table 9.4 Features respondents liked about Southwold Town Centre

Response	Study Area
Attractive environment/nice place	65.62%
Good range of non-food shops	16.21%
Traditional	14.36%
Good range of pubs, cafes or restaurants	9.02%
Nothing/very little	5.90%
Good range/quality of independent shops	7.13%
Makes a change from other places	4.66%
The seafront/beach	4.04%
Quiet	2.22%
(Don't know)	2.29%
Compact	1.72%
Other	1.63%
Easy to park	1.20%
Friendly/vibrant atmosphere	1.22%
Close to home	1.94%

Source: HTIS 2015

- 9.24 A key attraction for respondents is the town’s environment, good range of non-food shops and its traditional character. Southwold’s proximity to their home, the seafront and the range of independent shops also appealed to respondents. These responses confirm the findings of the health check and

site visits, and highlight some of the key features that can help Southwold to differentiate itself from the larger centres outside of the District.

- 9.25 Respondents were also asked what improvements, if anything, would encourage them to visit more often. The ‘top 15’ responses were as follows:

Table 9.5 Key Improvements for Southwold Town Centre

Response	Study Area
Nothing	63.61%
(Don't know)	20.56%
More/better parking	7.56%
Other	2.31%
Lower prices in shops	1.73%
Free car parking	1.69%
More independent shops	1.12%
More national multiple shops/high street shops	0.77%
Better public transport	0.85%
Better access by road	0.64%
More/better comparison retailers (i.e. non-food shops)	0.28%
More/better public conveniences	0.39%
Reduce traffic congestion/improve traffic flow	0.24%
Stop large retailers trading there	0.22%
More/better pedestrianised streets	0.15%

Source: HTIS 2015

- 9.26 The majority in each zone stated ‘*nothing*’ or ‘*don't know*’ (84.17% across the whole Study Area). Key improvements included more/better parking, better public transport and free car parking. The shortage of convenient car parks was also identified by the health check and site visits. Respondents also identified a need for lower prices in shops, more national multiple shops/high street shops and more/better comparison retailers.

ENVIRONMENTAL QUALITY

- 9.27 Southwold’s seafront setting provides an attractive backdrop to this popular tourist destination. The town centre is compact with a number of historic buildings and traditional shop fronts, all contributing to the town’s unique character and offer.
- 9.28 Market Place and the High Street are attractive settings for the heart of the town centre activity. The centre appears to be very well maintained, with a good provision of quality street furniture (including benches and planting).
- 9.29 There is an adequate level of visible green space in the town centre. On the corner of Victoria Street and the High Street there is a small area of well-maintained green space. Most importantly Southwold is bounded to the east by the North Sea, by the River Blyth and Southwold harbour to the south-west and by Buss Creek to the north. The links to the sea make it such a popular visitor destination and unique to the other district market towns.

NEW INVESTMENT AND POTENTIAL DEVELOPMENT

9.30 The town is covered by a Conservation Area and there are no known major sites with potential for retail and mixed use development. As a result of this there tends to be a large number of infill developments. However, we understand that there is currently a pending outline application for residential development of up to 71 new dwellings on the land to the south of Halesworth Road, in the neighbouring village of Reydon. This development would further increase trips to Southwold town centre and would heighten the importance of improving parking provision in the centre.

OUT OF CENTRE

9.31 There is no out of centre provision in Southwold. The only multiple food stores in the town centre are Tesco Express and Co-op. The closest larger format food stores are located in Beccles (Morrisons and Tesco) and Halesworth (Co-op).

SUMMARY

9.32 The health check has identified that Southwold has a number of strengths and weaknesses, and there are some opportunities for new investment and development to help improve the town's overall vitality and viability. The headline findings include the following:

- Although the town has the lowest number of units and floorspace in terms of retail, service and leisure use, it has the strongest comparison offer across the District's market towns. The comparison offer is focused on clothing and accessories, arts and crafts and antique and second hand goods.
- The town has a relatively good number of national multiple stores for a town of its size, particularly in comparison to the District's other market towns.
- The smaller convenience offer is good, comprising Co-op and Tesco Express and a number of local independent convenience stores. The centre does not have a major anchor foodstore.
- The town has a dual shopping role as it provides for both tourists, through the abundance of independent and specialist stores, and for local residents, with a strong provision of convenience goods.
- Southwold has a higher proportion of café and restaurant provision than Halesworth, Beccles or Bungay.
- Parking often reaches full capacity and this causes issues regarding safety, particularly during peak times when visitors park along the roadside. There is a need for additional, convenient parking to ensure trade in the town is not limited.

- Southwold's seafront setting provides an attractive backdrop to the town and alongside the town's historic buildings and independent retailing, contributes to the centre unique character. The town needs to further utilise these assets to encourage year-round tourism.
- The season is considered to be a minimum of at least 35 weeks however this can sometimes be extended to 45 weeks due to high visitor levels around the approach to Christmas, and over the New Year period.

10 DISTRICT & LOCAL CENTRES: HEALTH CHECK

10.1 This section provides a brief overview of the relative attraction, offer and performance of the main District and Local centres in Waveney as defined by the local planning authority and informed by their audits and our own site visited. The more detailed health check pro formas are set out in **Appendix 7** to this study.

DISTRICT CENTRES

10.2 The *Waveney District Core Strategy* adopted in 2009 identifies Kirkley and Oulton Broad as District Centres. These District Centres generally consist of a small group of shops with often at least one supermarket and a range of key services such as banks, building societies, post offices, restaurants and small independent convenience and comparison stores. These centres perform an important role and function meeting the day-to-day service and top-up needs of their local residents. They also provide important community public facilities such as a library.

Kirkley

10.3 Kirkley is the largest district centre in Waveney District with 77 Class A1-A5 and D1 and Sui Generis units. It is situated on a busy one-way street, London Road South which is located immediately south of Lowestoft town centre and runs parallel to the coast. This is one of the main routes into Lowestoft and it can become heavily congested with traffic.

10.4 The centre is formed along a linear High Street onto which small, shop units front. There are a number of larger buildings interspersed within this, but towards the northern end of the street there are some larger vacant buildings, including the Royal Court Hotel.

10.5 The centre is characterised by independent stores and cafés. Convenience provision includes a Co-op food store, supplemented by smaller independent newsagents and a bakery (see Appendix 7).

10.6 There is a relatively good comparison offer, which includes nine charity shops, craft/gift shops and antique stores.

10.7 A district centre should generally contain a mix of retail, leisure and financial services, including banks and building societies, but we note that there is a shortage of both of these in Kirkley. There is a Rainbow Saver Anglia Credit Union located next to the Co-op store, however there are no high street banks or building societies.

10.8 The centre is well-represented in terms of hairdressers with a total of six units.

10.9 There are some ten vacant units in the centre, equivalent to a vacancy level of 12.99% which is above the national average. However, vacancy levels have fallen since the 2006 study, and we noted a decline in the number of vacant units in our recent audit of the centre in November 2015.

Furthermore, the vacant units are dispersed along London Road South and there are no significant clusters.

Oulton Broad

10.10 Oulton Broad is divided into two parts with the southern end being set back from the street across the bridge by Oulton Broad and the other being located on a busy stretch of linear high street, with the majority of units on the eastern side of the street.

10.11 The centre is anchored in the south by a Spar convenience store. Other occupiers in this part of the centre include several restaurants/cafes, a public house and a gift shop. There is a large vacant wine bar that is located on the high street to the north of the centre. Although the south of Oulton Broad is smaller and not as busy, it is likely to have increased levels of seasonal trade due to the proximity of the Broads.

10.12 The northern side includes a small parade of shops, with occupiers including a beauty clinic and carpet shop. In regards to a convenience offer, there is a small Premier store. Similarly to Kirkley, there is a gap in financial services, particularly banks and building societies. However there is a public library located to the north of the centre.

LOCAL CENTRES

10.13 Local centres generally have a range of small shops and services which serve a small catchment. They typically may include a small supermarket, a newsagents, post office and pharmacy, along with some food and beverage offer. They generally have a limited offer. In rural areas, villages may perform the role of a local centre. For example the village of Wrentham is a designated local centre in Waveney District.

10.14 There are fifteen local centres distributed throughout Waveney District. These centres to a varying degree provide a range of complementary retail, service and social facilities for their local communities. More detailed summary sheets for each individual centre are set out in Appendix 7.

10.15 There is only one larger Local centre within the District, namely London Road (Pakefield):

- **London Road (Pakefield)** is the larger of the local centres, with 23 units. It is anchored by both Co-op and Spar and there is a balance of convenience, comparison and service outlets. There are three vacant units and this figure has remained consistent since the 2006 survey. The centre has all the key elements of a local centre so adequately meets the needs of the local population.

10.16 Carlton Road, Westwood Avenue and Wrentham are all slightly smaller local centres:

- **Carlton Road** has 12 units. There is no convenience offer and instead is based primarily on a comparison, service and leisure use role. The comparison offer includes a specialist Kiteboarding store and there is a café and a hot-food takeaway. Due to the lack of convenience offer here, the centre is not considered to meet the daily needs of local residents so does not fulfil its role as a local centre.
- The village of **Wrentham** has a total of 12 units. It also has a limited convenience offer with only one small local convenience store (Wrentham Stores). It has a specialist comparison provision with a retail warehouse store and home furnishing shop (The Original Factory Shop and Stoves). There are three vacant units in the centre.
- **Westwood Avenue** has 11 units. It consists of primarily a convenience offer including a multiple representation (Co-op and One Stop), along with a bakery and fishmongers. There is also a good service representation including a post office and hairdressers. There is just one vacant unit in the centre. Overall we consider that this centre successfully meets the day-to-day needs of the local population.

10.17 The remainder of the local centres all have ten or fewer outlets:

- **Kessingland High Street** is the larger of the two centres in Kessingland with a total of nine units. It is comprised of a linear High Street with all units located along one side. The High Street is anchored by a Costcutter. There is a range of retail services and comparison stores located along the street. There are two vacancies, including a large, former public house and a Post Office.
- **Kessingland Field Lane** is comprised of a parade of shops around a 5-10 minute walk away from the separate High Street area. The smaller of the two Kessingland centres, there are only four units along the parade. The centre is anchored by Co-op which is complemented by a newsagent. There is also a takeaway and hair dressers. There are no vacancies.
- **Famona Road** has a total of five outlets with a mix of uses however it is predominately convenience based. There is a Londis store as well as a smaller newsagent which neighbours this. There is also a florist and public house. There are no vacancies.
- **Village Rise** is comprised of a purpose-built shopping precinct with a small but adequate range of shops and services including two convenience stores, hairdressers and a takeaway. There are a total of seven units and there are no vacancies.
- **Hollingsworth Road** has six units situated on a single parade of shops. The largest of these units is a Nisa local convenience store which is complemented by a butchers and a bakery. There are no vacancies.
- **Bittern Green** is considered to be the only local centre that is not fulfilling its designation as a local centre. There are only three units, one of which is vacant. The other two are occupied by

a hot-food takeaway and hairdressers. There is no convenience or comparison offer serving the local population within the centre which questions its role in the local centre hierarchy.

- **Ashburnham Way** is anchored by a large Co-op supermarket. Additional operators within the centre include a pet shop, charity shop, pharmacy and newsagents. There is also a doctor's surgery linked to the centre via the large car park. There are no vacant units.
- **Snape Drive** is a residential area located in the outskirts of north-west Lowestoft. There are a total of eight units and one of these units is currently vacant. Operators include two hot-food takeaways, a bike/shoe repair store and hairdressers. There is only one small convenience store (Dylann's Newsbox).
- **Hillside Avenue** is anchored by a One Stop store which has an internal Post Office. There is also a small newsagent to complement this store, however the opening times are limited opening only until midday. There is also a hot-food takeaway and hairdressers. There are no vacancies.
- **Oulton Road** is comprised of four units along a single parade including a One-Stop convenience store. There are also two takeaways and an East of England Co-op funeral service. A public house neighbours the centre. There are no vacant units.
- **The Green** has only a limited convenience offer with just one small Premier store but two hot-food takeaways. There is also a training centre and local housing office. Opposite the centre is a large play area including a games area and play equipment. There are no vacant units.

10.18 All but one of the local centres are considered to be generally healthy and successfully performing the local centre role of providing for the day-to-day needs of local residents. However Bittern Green is regarded as being fragile and not performing its role within the District's retail hierarchy due to the lack of convenience retail.

11 QUANTITATIVE RETAIL NEED ASSESSMENT

11.1 This section sets out the results of the quantitative retail need (capacity) assessment for new retail (comparison and convenience goods) floorspace in Waveney District covering the period from 2015 (the 'base year') to 2032 (the 'design year'), broken down into five year periods. This assessment updates and supersedes the findings of the Council's previous evidence-based studies.

THE CREATE MODEL: KEY ASSUMPTIONS & FORECASTS

11.2 The CREAT^e model has been specifically designed and developed by Carter Jonas over a number of years to assess the capacity for, and impact of new retail (convenience and comparison goods) development and investment. The (Excel-based) model adopts a transparent 'step-by-step' approach in which all the key assumptions and forecasts can be easily tested, in accordance with good practice advice. The model draws on the market share analysis derived from the household telephone interview to help inform the assessment of the current turnover and trading performance of existing centres, shops and stores at the base year.

11.3 In simple terms the quantitative capacity for new retail floorspace is broadly derived from the forecast growth in population and expenditure, after making an allowance for new commitments, and the increased 'productivity' (or 'efficiency') of all existing and new floorspace. In certain cases capacity can also occur where there is a clearly identified 'imbalance' (or 'over-trading') between the turnover of existing facilities at the base year (2016), and the total available expenditure in the defined study/catchment area.

11.4 The assumptions and forecasts underpinning the CREAT^e model are based on robust evidence, research and best practice (also see Section 3):

- The 2016 population figures have been sourced from Experian²¹ and are based on the latest ONS Sub-National Population Projections.
- The population projections to 2032 are based on Experian's '*demographic component model*', which takes into account age, gender, birth rates, ageing, net migration and death rates. These projections have been cross-referenced and checked against the Council's population projections for the District to ensure their robustness for the purpose of the retail assessment.
- The average retail (convenience and comparison goods) expenditure per capita levels by zone at the base year have also been sourced from Experian's MMG3 GIS (please note all expenditure and turnover figures are expressed in 2013 prices).

²¹Derived from our in-house Experian MMG3 Geographic Information System (GIS).

- The annual growth forecasts for (convenience and comparison goods) expenditure per capita have been informed by Experian's October 2015 *Retail Planner Briefing Note 13* (see Section 3, Table 3.1).
 - The survey-derived market shares for 'non-store' retail sales (otherwise referred to as *Special Forms of Trading*) have been deducted from the expenditure per capita figures at the outset for the purpose of the retail capacity assessment. The forecast growth in SFT up to 2036 is in line with the national forecasts set out in Experian's latest Briefing Note, based on data published by the Office for National Statistics (ONS) (see Section 3, Table 3.2)
 - An allowance for the increased 'productivity' of existing and committed retail (convenience and comparison goods) floorspace over the forecast period has also been informed by Experian's latest Briefing Note (see Section 3, Table 3.4).
- 11.5 At the outset the Council should be aware that long-term forecasts should necessarily be treated with caution, as they will be influenced by changes in economic, demographic and market trends. As a result we advise that greater weight should be placed on the short term forecasts carried out over a five year period (see NPPG, para 003). Notwithstanding this, Waveney District Council will need to take account of the forecast capacity for new retail floorspace over the plan period, as the NPPF (para 23) states that local planning authorities should meet the need for retail and town centre uses in full.
- 11.6 The capacity forecasts are therefore intended as a guide to enable Waveney District Council to assess the broad strategic options for the spatial distribution of new retail-led development over the plan period, and make informed policy choices about where any forecast need should be met in accordance with the advice set out in the NPPF. It follows that the allocation of sites to meet any identified need over the next five years and over the lifetime of the development plan will depend on a range of key considerations, including the suitability, viability and availability of sites in or on the edge of existing centres, and the potential to expand existing centres to accommodate the forecast needs.
- 11.7 The capacity tabulations for convenience goods and comparison goods are set out in **Appendix 8** and in **Appendix 9** respectively. The key steps in the retail capacity assessment, and the main assumptions and forecasts underpinning the CREAT^e Model are described in more detail below.

POPULATION AND EXPENDITURE FORECASTS

Population Projections

- 11.8 Table 1 (**Appendix 8 & 9**) sets out the base year population for the defined study area and eight study zones.

11.9 Experian's population figures show that there are 325,685 persons resident in the wider study area in 2016. Of this total, some 118,898 (36.5%) reside in Zones 3-5, which broadly comprise the local planning authority area.

11.10 According to Experian's projections the population in the broadly defined Waveney District area (Zones 3-5) is projected to increase by +5.15% between 2016 and 2032 (to 125,022 people). In comparison, the Council's own projections indicate a higher +7.46% growth in the District's population over the same period.

11.11 Given the differences between Experian's and the Council's population projections, we have necessarily revised the population growth for Zones 3-5 upwards to reflect the Council's slightly higher forecast growth of +7.6%. This results in an increase in the total population within the Waveney area (Zones 3-5) from 118,898 persons in 2016, to 127,772 by 2032. In other words 2,750 more people are assumed to be living in Zones 3-5 under the Council's forecasts.

Expenditure Per Capita and Special Forms of Trading (SFT)

11.12 Table 2 sets out the average expenditure per capita estimates for both convenience goods (**Appendix 8**) and comparison goods (**Appendix 9**) in 2015 for each of the eight study zones, after making an allowance for Special Forms of Trading (SFT)²². As described above, the 2016 average expenditure per capita figures have been derived from our in-house Experian MMG3 GIS.

11.13 Our assessment of a robust and appropriate allowance for SFT at the local level has been informed by the results of the household survey. The survey-derived shares have necessarily been adjusted downwards to reflect the fact that a proportion of online sales are still sourced from traditional stores rather than from dedicated ('dotcom') warehouses²³.

11.14 The adjusted market share analysis shows that SFT's current share of available expenditure in the total study area is 13.7% for comparison goods, which is slightly above the national average figure of 12.4% identified by Experian. For convenience goods the locally adjusted SFT market share is 2.0%, which is one-third of the 2016 national average of 3.0%.

11.15 Our forecasts of the potential growth in SFT's market share up to 2032 for both convenience and comparison goods retailing are in line with the year-on-year forecasts published by Experian, and indicate:

- SFT's market share of **comparison goods** expenditure will increase to 16% in 2032, which is slightly above the Experian national average figure of 14.5%; and

²² SFT comprises non-store sales via the internet, mail order, stalls and markets, door-to-door and telephone sales.

²³ Drawing on Experian's latest research we have assumed that some 25% of SFT comparison goods sales and 70% of convenience goods sales are sourced from traditional ('physical') retail space.

- for **convenience goods** the forecast market share of 3.9% in 2032 is lower than Experian's figure of 6%.

11.16 Clearly if the growth in SFT is higher in Waveney District than the national projections, then this will effectively reduce the total available expenditure to support existing and new floorspace over the forecast period.

Average Expenditure Growth Forecasts

11.17 The growth in average expenditure per capita levels up to 2030 has been informed by the forecasts set out in Experian's latest Briefing Note (see Section 3). Experian forecast more limited year-on-year growth in convenience and comparison goods expenditure than previous (pre-recession) forecasts and their historic 'ultra' long (1974-2014) and 'medium' term (1997-2007) trends.

Total Available Expenditure

11.18 The total available convenience and comparisons goods retail expenditure in the Study Area (Table 3; **Appendix 8 and 9**) is derived by multiplying the population (Table 1) and average expenditure per capita (Table 2) levels together.

11.19 For the study area (Zones 1-8) there is a forecast +9.1% (+£63.4m) growth in total convenience goods expenditure, from £693.6m in 2016 to £757m by 2032; and a +74.2% (+£692.3m) growth in total comparison goods expenditure, from £932.8m to £1,625.1m.

11.20 For the broad Waveney District area (Zones 3-5) the tables show there is a +7.2% (+£17.7m) growth in convenience goods expenditure between 2016 and 2032; from £247.3m to £265m. Total available comparison goods expenditure is forecast to increase by +70.8% (+£229.6m) from £324.3m in 2016 to £553.9m by 2032.

11.21 The scale and growth in comparison goods expenditure significantly outstrips convenience goods spend up to 2032. This effectively means that there should be greater capacity potential for new comparison goods floorspace over the forecast period than for convenience goods retailing, although this will be dependent on the level of retail commitments in the pipeline.

MARKET SHARE ANALYSIS

11.22 Section 4 described the headline results of the survey-derived (%) market share analysis, including SFT, based on the detailed tabulations set out in **Appendix 4** for convenience goods and **Appendix 5** for comparison goods. For the purpose of the retail capacity assessment (in accordance with good practice as described above²⁴) the market share analysis (including SFT) has been adjusted for both

²⁴ This is in accordance with the standard approach for retail assessments, which make a deduction for SFT at the outset from the expenditure per capita figures.

convenience goods (Table 4, **Appendix 8**) and comparison goods (Table 4, **Appendix 9**) retailing to exclude SFT.

11.23 The next key stage in the capacity assessment involves allocating the baseline convenience and comparison expenditure (£ million) within the Study Area and zones to the identified centres, stores and floorspace based on the survey-derived market shares (%). This helps to establish the current 'baseline' (2016) trading performance for the main centres and stores across the District area based on expenditure drawn from the Study Area zone (Table 5).

11.24 It should be noted that no allowance is made at this stage for any potential "inflow" (trade draw) of expenditure to centres and stores from outside the defined Study Area.

11.25 For both convenience and comparison goods the 'baseline' turnovers are projected forward to 2021 (Table 6), 2026 (Table 7), 2031 (Table 8) and 2032 (Table 9), assuming no changes in market shares. This so-called 'constant market share approach' is standard practice, and is widely used and accepted for strategic retail assessments. However, the Council will be aware that it is a highly theoretical in that it does not, for example, take account of the potential impact of new retail investment and development (both within and outside the District) on existing shopping patterns and market shares over time.

'INFLOW' AND BASE YEAR TURNOVER ESTIMATES

11.26 In order to provide a complete picture of the current trading (turnover) performance of the main centres and stores in Waveney District we have necessarily made informed judgements with regard to the likely 'inflow' (trade draw) from outside the Study Area (see Table 10). In the absence of detailed published turnover and trade draw information at the local level, our judgements have been informed by previous studies and retail assessments, as well as the survey and health check evidence. The 'inflow' assumptions also take account of:

- the scale, offer and location of all existing centres and stores in the District;
- the likely extent of their catchment areas;
- the competition from centres, stores and shopping facilities outside the District and the wider Study Area; and
- the likely retail expenditure derived from people who live outside the Study Area (including visitors and commuters) to main centres and stores in the District.

11.27 Although the assessment of 'inflow' is not a straightforward exercise, due to the complex nature of overlapping catchments and shopping patterns, it is reasonable to assume that the District's main centres will draw a proportion of their comparison goods expenditure from outside the widely defined study area. In this case we estimate that 10% of Lowestoft's total turnover will be drawn from outside the study area, which reflects the relative scale of its retail offer and its role in the retail

hierarchy. For Beccles, Bungay and Halesworth we have also assumed a 10% draw to reflect the likely positive impact of visitors/tourists on the local economy and retail expenditure. For Southwold we estimate that a much higher proportion (up to 60%) of its comparison goods turnover could be derived from outside the study area to reflect its significant year-round draw of visitors and tourists.

11.28 For convenience goods we have assumed a minimal 'inflow' of expenditure to the main centres of approximately 5% from outside the study area. This reflects the level of choice and competition from foodstores outside the District, and the fact that foodstores generally have more localised catchments and households generally choose to shop at their most convenient and accessible stores. However, for Southwold we have assumed a high 'inflow' of up to 35% from outside the study area; this again reflects the likely impact of visitors and tourists on the centre's overall turnover.

11.29 Based on the (survey-derived) market analysis and the 'inflow' assumptions, Table 10 sets out the revised 'current' convenience and comparison goods turnover estimates for the main centres and stores in Waveney District.

RETAIL COMMITMENTS

11.30 Based on our discussions with Waveney District Council, we are only aware of one major retail commitment in the pipeline at the time of preparing this report. This is the permission for new large format retail warehouse floorspace on land south of Peto Way/Denmark Road outside the town centre (application reference DC/13/0110/OUT). The permission allows for 3,856 sqm gross of new 'bulky goods' retail floorspace, which is equivalent to a sales area of 3,085 sqm net based on a net/gross ratio of 80%. We have assumed that the permitted floorspace will achieve a turnover of £10.8m in 2016 (2013 prices), increasing to £15.2m by 2032 (assuming growth in turnover efficiency in line with Experian's forecasts).

WAVENEY DISTRICT: CAPACITY FORECASTS

11.31 The 'global' capacity forecasts for new retail floorspace in Waveney District up to 2032 are set out in Table 11 for convenience goods (**Appendix 8**) and comparison goods (**Appendix 9**).

11.32 It has necessarily been assumed for the purpose of the capacity assessment that Waveney District's retail market is in 'equilibrium' at the base year. In other words we assume that the existing centres and stores in the District are broadly trading in line with appropriate 'benchmark' turnover levels at the base year. This is supported by the findings of the centre audits and site visits which did not show any strong indication of 'overtrading' in the main town centres and stores²⁵. This approach also reflects the impact of the economic recession and the growth in internet sales, which has reduced trading levels across the UK. On this basis any residual expenditure available to support

²⁵ Overtrading normally manifests itself at the local level in terms of pedestrian and car park congestion, long queues at checkouts, congestion in aisles, etc.

new retail floorspace within the Study Area over the development plan period will be derived from the difference between the forecast growth in 'current' (survey-derived) turnover levels; and the growth in 'benchmark' turnovers based on applying robust year-on-year 'productivity' ('efficiency') growth rates to all existing and new retail floorspace²⁶.

Convenience Goods Capacity

11.33 Table 12 (**Appendix 8**) sets out and explains the key steps underpinning the convenience goods capacity assessment. The 'baseline' expenditure and floorspace capacity forecasts are summarised below:

Table 11.1 Waveney District – Convenience Goods Capacity

	2016	2021	2026	2031	2032
Residual Expenditure (£m):	-	£10.5	£19.4	£26.3	£27.2
FLOORSPACE CAPACITY (m² net):					
Superstore Format:	-	850	1,566	2,122	2,197
Supermarket/Discounter Format:	-	1,635	3,012	4,080	4,226

Source: Table 12, Appendix 8

11.34 In order to convert the residual expenditure into a net sales figure we have assumed that new 'superstore format' floorspace will be occupied by a 'top 6' grocer (i.e. Tesco, Sainsbury's, Asda, Morrisons, Waitrose and Marks & Spencer) and will achieve an average sales density of circa £12,500 per m² in 2016 (2013 prices). On this basis the forecasts show that there is capacity for 850m² net of new convenience goods floorspace by 2021, increasing to 2,197m² net by 2032.

11.35 Alternatively, assuming the residual expenditure capacity is taken up by a supermarket (e.g. Co-Op, Budgens, etc.) and/or 'deep discount' retailer (e.g. Aldi, Lidl, Netto, etc.) trading at lower average sales levels of circa £6,500 per m² in 2015, then there is forecast capacity for 1,635m² net of new convenience floorspace in 2021, increasing to 4,226m² net by 2032.

11.36 To further help inform the Council's assessment of the potential scale and optimum location for new retail (convenience and comparison goods) floorspace in the District, we have also carried out a more refined (location-by-location) capacity assessment. However, it should be noted at the outset that any forecast capacity identified for a specific centre/area does not necessarily mean that all the retail floorspace can and/or should be provided within that centre per se. For example, there may be a lack of suitable and viable sites available in some centres, or there may be other policy, heritage, transport and physical constraints to development. Alternatively it may be more appropriate to locate

²⁶ The 'productivity' growth rates are based on Experian's latest Retail Planner Briefing Note. However, it should be noted that individual centres, stores and shopping facilities will be capable of achieving higher and/or lower annual 'productivity' growth depending on a range of trading factors (including the size, quality and type of retail floorspace).

the floorspace capacity in one centre over another to encourage more sustainable travel patterns and/or help to achieve specific policy, regeneration and/or investment objectives.

11.37 Against this background, Tables 13-18 disaggregate the District-wide 'global' capacity for the main centres and stores based on their relative trading performance and market shares at the base year, and the forecast growth in available expenditure and floorspace 'productivity' up to 2032. The results are summarised in Table 19 for 'superstore format' floorspace only and reproduced below.

Table 11.2 Waveney District's Main Shopping Locations: Capacity for Superstore-Format Floorspace

	2016	2021	2026	2031	2032
Lowestoft:	-	489	911	1,251	1,299
Beccles:	-	236	426	565	584
Bungay:	-	30	54	71	73
Halesworth:	-	51	93	123	126
Southwold:	-	7	13	17	18
Other District, Local and Village Centres	-	37	69	94	98
TOTAL DISTRICT-WIDE CAPACITY (m² net):	-	850	1,566	2,122	2,197

Source: Tables 13-18, Appendix 8

Notes: The capacity forecasts for Lowestoft, Beccles, Bungay and Halesworth include all town centre, edge and out of centre retailing.

11.38 The table shows that there is capacity for 489m² net of new convenience floorspace in Lowestoft in 2021. This would support a small convenience store format (such as, for example, Tesco Express or Sainsbury's Local), or an extension to existing stores. By 2032 the capacity for new floorspace is forecast to increase to 1,299m² net. This could support a larger format store of circa 2,000-2,500m² gross, assuming a proportion of the floor area is set aside for comparison goods sales. Alternatively it could support a number of smaller format convenience stores, or extensions to existing stores.

11.39 By 2032 there is limited forecast capacity for Beccles (584m² net), Bungay (73m²), Halesworth (126m²), Southwold (18m²) and the District other centres (98m²). Realistically this level of floorspace could support a smaller convenience store format in Beccles, and smaller stores and/or extensions to existing stores in the other centres.

11.40 In accordance with policy we have assumed that that the capacity generated by the District's out-of-centre stores should be directed to the main town centres first, in accordance with national and local plan policy. However meeting this need in full over the lifetime of the development plan period will depend on whether there are any suitable and viable sites in or on the edge of the main centres that are capable of accommodating a larger quantum of convenience goods floorspace; and whether these sites are currently available and/or will become available over the lifetime of the development plan. If not, then the forecast capacity could possibly be accommodated by the extension of existing out-of-centre stores, subject to the sequential and impact tests set out in the NPPF.

11.41 If sufficient town centre and/or edge of centre sites are not available to meet the forecast capacity over the development plan period, then local planning authorities are required by the NPPF (paragraph 23) to set policies for meeting the identified needs in other accessible and sustainable (out of centre) locations that are well connected to the town centre and are capable of generating benefits for the centre’s overall vitality and viability, such as through linked pedestrian trips and increased footfall. We consider the potential availability and suitability of sites in and on the edge of the District’s main centres in more detail in Section 13.

Comparison Goods Capacity

11.42 Table 12 (**Appendix 9**) sets out the detailed steps in the comparison goods capacity assessment and the results are summarised below.

Table 11.3 Waveney District – Comparison Goods Capacity

	2016	2021	2026	2031	2032
Residual Expenditure (£m):	-	-£7.8	£25.0	£68.3	£78.1
FLOORSPACE CAPACITY (m² net):					
New Comparison Goods Floorspace:	-	-1,379	3,994	9,879	11,063

Source: Table 12, Appendix 9 (Steps 5 & 6)

11.43 As the table shows, there is a no District-wide capacity for new comparison goods floorspace in 2021 due to the impact of new commitments (i.e. the extant permission for large format retail warehousing on land south of Peto Way/Denmark Road). Capacity increases thereafter to 3,994m² net by 2026 and 11,063m² net by 2032.

11.44 The forecast residual expenditure capacity has been converted into a net retail sales area based on an assumed average sales density for all new non-food floorspace of circa £5,000 per m² at 2015. This is broadly equivalent to an average sales density for retail units in prime shopping locations. However, average sales levels inevitably vary between different locations, different retail formats, and different operators²⁷. Where this is the case it will have implications for assessing the capacity for, and impact of new retail floorspace. The local planning authority will therefore need to take this into account when assessing and determining applications for different operators and different types of retail floorspace in different locations (such as, for example, ‘bulky goods’ retail warehousing).

11.45 The forecast ‘global’ capacity has been allocated to the District’s main shopping locations based on their relative trading performance and market shares at the base year.

²⁷ This includes the type of goods sold by the retailer, the location and quality of the retail floorspace, and the size and affluence of the catchment population. For example, published trading figures show that ‘bulky goods’ retailers in the DIY, carpet and furniture sectors generally achieve lower average sales levels of between £1,500 and £4,000 per m², whereas large format electrical goods retailers can achieve much higher average sales levels of £7,000 per m² and above.

Table 11.4 Waveney District's Main Centres and Shopping Locations – Comparison Goods Capacity

	2016	2021	2026	2031	2032
Lowestoft:	-	-1,632	2,237	6,503	7,364
Beccles:	-	153	921	1,743	1,908
Bungay:	-	39	229	432	473
Halesworth:	-	38	378	750	824
Southwold:	-	15	154	305	335
Other District, Local and Village Centres	-	9	74	145	159
TOTAL DISTRICT-WIDE CAPACITY:	-	-1,379	3,994	9,879	11,063

Source: Table 13-18, Appendix 9

11.46 As the table shows, there is no forecast capacity for Lowestoft up to 2021 due to the impact of the new commitment on land south of Peto Way/Denmark Road. Thereafter there is forecast capacity for 2,237m² by 2026, increasing to 7,364m² net by 2032. This is broadly equivalent to a total gross floorspace of 10,520m², assuming a net/gross ratio of 70%.

11.47 By 2032 there is more limited forecast capacity in Beccles (1,908m²), Bungay (473m²), Halesworth (824m²), Southwold (335m²) and the District's other smaller centres and villages (159m²).

SUMMARY

11.48 This section has assessed the capacity for new (convenience and comparison goods) retail floorspace in Waveney District's main centres and shopping locations. These forecasts have been informed by robust assumptions and forecasts.

11.49 As its starting point, the capacity assessment assumes that the District's (convenience and comparison goods) retail market is in 'equilibrium' at the base year and tests a 'constant market share approach' over the forecast period in accordance with good practice.

11.50 For convenience goods there is forecast capacity for 2,197m² net of new 'superstore format' floorspace in Waveney District by 2032. The majority of this floorspace capacity is focussed on Lowestoft (1,299m² net) and Beccles (584m² net).

11.51 For comparison goods there is forecast District-wide capacity for 11,063m² net by 2032. The majority of this floorspace capacity is also focussed on Lowestoft (7,364m² net) and Beccles (1,908m² net).

11.52 In summary, meeting the need for the forecast new retail floorspace in full over the next 5 years, and over the lifetime of the development plan, will clearly depend on the Council identifying suitable and viable sites and redevelopment opportunities in the District's main centres that are either available now, or will be available at some point in the next 5, 10 and 15 year periods. If appropriate sites and redevelopment opportunities are not likely to come forward over the development plan period, then consideration should be given by the Council to sites on the edge of these centres that are well

connected to the primary shopping areas and are capable of reinforcing the pedestrian retail circuit and generating linked trip expenditure to the benefit of each centre's overall vitality and viability. We consider the availability and suitability of potential sites identified at this stage in more detail in Section 13 of this study.

11.53 Finally, it is important to restate that capacity forecasts beyond five years should be treated with caution, as they are based on various layers of assumptions and forecasts with regard to the trading performance of existing centres and stores, the growth in population and retail spending, constant market shares, etc. For example, if the growth in Internet and multi-channel shopping is stronger than current forecasts suggest, then this could reduce the future demand and capacity for new 'physical' space over the long term. The Council should take into account these margins for error when assessing the need for new retail floorspace.

12 COMMERCIAL LEISURE NEED/'GAP' ASSESSMENT

12.1 The NPPF (paragraph 23) states that in drawing up Local Plans to ensure the vitality of town centres, local planning authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres. Against this background leisure uses can make a significant contribution to a town centre's vitality and viability. A good provision and choice of leisure facilities and uses can help to increase 'dwell times', footfall and turnover in centres, with significant benefits for both daytime and evening economies. However, forecasting the need for new commercial leisure uses is more complicated and problematic than for retailing, as the sector is highly complex and dynamic, and particularly sensitive to changes in economic, demographic, lifestyle and fashion trends. Consequently the methods and approaches developed to forecast the need for new commercial leisure floorspace and uses are more wide-ranging and less sophisticated than for retail capacity forecasts.

12.2 The NPPF recommends that need assessments for new leisure uses and floorspace should take account of both quantitative and qualitative considerations (paragraph 161). In this context our analysis focuses on the following key elements:

- a review of the key trends driving market demand in the sector over the last 10-15 years;
- an audit of existing commercial leisure uses in the District (both town and out-of-centre) to help identify any marked 'gaps' in provision;
- a review of the results of the household survey to understand current commercial leisure participation rates and preferences across the District; and
- a broad economic assessment of the need for new additional leisure facilities across the main centres based on different datasets and accepted approaches.

12.3 For the purpose of our assessment we have necessarily focussed on the main commercial leisure uses that are widely accepted as making a significant contribution to the overall vitality and viability of town centres; namely food and beverage uses (Class A3-A5), cinemas and healthclubs and gyms, and to a lesser extent ten-pin bowling, casinos and bingo halls.

CINEMA PROVISION AND POTENTIAL NEED

12.4 According to research by Dodona (a specialist market research consultancy in the cinema industry) there are 750 cinemas in the UK with a total of 3,909 screens, of which approximately three-quarters are multiplexes. Research shows that the number of screens has risen by 42 between 2013-14 due to the increase in the number of multiplex screens. The rest of the market is mainly represented by smaller multiplex operators and independents which tend to operate non-multiplex cinemas (i.e. less than five screens) and screens in mixed-use venues (such as arts centres). However the cinema industry has not been immune from the recession and there have been some closures since 2008,

although the majority have been smaller art centre venues rather than the larger chains. Notwithstanding this, the industry generally appears to be in good health and the UK is the second largest consumer market for filmed entertainment in the world after the USA. The latest research shows that box office revenue in 2014 in the UK exceeded £1bn for the fourth year in succession, based on 157.2m admissions, which although lower than in 2013 (165.5m admissions), maintained the flat trend that has been apparent since 2002. Overall the cinema sector has remained relatively resilient in the prevailing economic and consumer environment.

- 12.5 In recent years, cinema operators have also introduced changes to the cinema experience, including premium seating areas and better quality refreshments, such as alcohol and higher quality food. For example, Vue Cinemas introduced their 'Evolution' concept which provides a mix of seating types comprising bean bags and sofas, as well as regular seats. Cineworld has also introduced the 'Screening Room' concept, characterised by leather chairs and table service. The first 558m² 'Screening Room' cinema opened in June 2011; in the Brewery, Cheltenham. Research by Dodona indicates there has been a growth in smaller (Digital) cinemas to serve smaller catchment areas. These Digital cinemas are more flexible and less "space-hungry" as they do not require the large sloping auditoriums needed to accommodate traditional projectors. There are therefore opportunities for the modern cinema offer to be provided in existing buildings. Examples include the HMV in Wimbledon which has a small Curzon cinema above the store.
- 12.6 For Waveney District, the results of the household survey show that just under half (49.4%) of the Study Area's population visit the cinema at least once a year. In terms of frequency of visits, respondents mainly visited the cinema once every two months (37.7%) or every month (25.7%). Only 5.54% of respondents in the Study Area visit the cinema on a more frequent basis (e.g. once a week or fortnight). Of those that visit the cinema, the survey showed that they tend to frequent the cinemas located in the larger towns in the area; for example, 33.4% visit the Odeon IMAX in Norwich; 14.0% visit the Hollywood Cinema in Great Yarmouth; and 10.6% visit the Vue Cinema in Norwich.
- 12.7 Only a small proportion of respondents to the survey stated that they visit the cinemas in the District, with:
- 8.7% visiting the 4-screen East Coast Cinema at 41 London Road South, Lowestoft;
 - 6.3% the one-screen Marina Theatre in Lowestoft;
 - 0.2% The Cut, also one-screen, in Halesworth;
 - 0.2% the small 70-seat Electric Picture Palace in Southwold; and
 - 0.1% the Fisher Theatre in Bungay which provide occasional film screenings.

- 12.8 Across the different zones the survey results indicate that in Zones 3 and 4 (the Lowestoft area) the main cinema visited is the East Coast Cinema, which is achieving a market share of 32.3% in Zone 3 and 29.8% in Zone 4. However a high number proportion of respondents in Zones 3 and 4 also travelled to the Norwich Odeon IMAX (28.9% and 28.0% respectively). In Zone 5 (which covers Beccles, Bungay, Halesworth and Southwold) a significantly higher proportion of cinema-goers (66.7%) visit the cinemas in Norwich (Vue and Odeon IMAX).
- 12.9 The survey evidence shows that the retention of cinema trips within the District is relatively low which reflects the limited provision and choice of multiplex cinema screens that are able to compete 'like-against-like' with the larger cinemas in Norwich. There would appear to be potential to provide a new multiplex to help claw back trips and leisure expenditure from competing locations, although this will be subject to market demand and commercial viability. The preferred location would be in or on the edge of Lowestoft Town Centre to help consolidate its role as the principal shopping and leisure destination serving the District's population.

FOOD AND BEVERAGE NEED

- 12.10 The food and beverage sector, including restaurants, bars and pubs (Class A3, A4 and A5), provide an increasingly important part of a town centre's wider offer and economy. They also complement other town centres uses, particularly shops, offices and cinemas, helping to lengthen 'dwell times' (the time people spend in centres) and increase expenditure as part of the same trip.
- 12.11 Research shows that average household spending on leisure services in the UK is largely dominated by eating and drinking out. Even in the context of the current economic recession this sector has remained buoyant and the year-on-year forecasts for growth by Experian are strong:

Table 12.1 Forecast year-on-year growth in leisure expenditure per capita

Vol. Growth per head (%):	-----ACTUAL GROWTH-----					FORECASTS				
	2010	2011	2012	2013	2014	2015	2016	2017	2018-22	2023-35
Retail Spend	0.9	-0.6	1.4	2.3	2.7	3.2	2.1	2.0	2.0	2.4
Leisure Spend	0.2	1.9	-0.6	0.2	1.4	2.7	1.6	1.6	1.3	1.4

Source: Experian Retail Planner Briefing Note 13 (October 2015); Figures 1a and 1b.

- 12.12 The following provides a summary of some of the key trends driving changes in the food and beverage sector over recent years:

- **Pubs and Wine Bars** - pub operators have widened their food and non-alcoholic beverage offer, resulting in the growth of so-called "gastro-pubs" in competition with more established restaurants, and the rise in 'micro pubs'. Notwithstanding this the sector has also been characterised by increasing consolidation and closures. According to the Campaign for Real Ale

(CAMRA) there have been 5,800 pub closures since 2008²⁸. Recent research by CAMRA also suggests that on average around 29 pubs closed every week in the UK between June and December 2014²⁹. The sale of pubs for conversion to alternative uses has also increased over recent years, particularly for convenience retailing (e.g. Tesco Express and Sainsbury's Local).

- **Restaurants** – this sector has also experienced mixed fortunes during the economic downturn. Some of the key trends driving change in this sector include an increase in 'eating at home', which has increased sales for take-aways and deliveries. At the same time customers are increasingly basing their decisions to eat out on 'value for money', but not at the expense of quality in terms of service, food and the overall experience. Recent successes include Jamie's Italian, Bill's and Cote. There has also been a growth in 'all-you-can-eat' style restaurants which are aimed at offering value for money (examples include the Taybarns brand owned by Whitbread).
- **Cafés/Coffee Shops** – This sector has experienced strong growth over the last five years. The branded coffee chains dominate the market with some 6,495 outlets in 2014 and a £3.3bn turnover. Of these, the three leading multiple chains are Costa Coffee (1,821 outlets), Starbucks Coffee Company (824) and Caffè Nero (590), representing a combined 56% of the branded chain market by outlet numbers³⁰. Costa Coffee has a recorded £878m turnover alone. Notwithstanding the rise of the multiples, there has also been growth in independent and specialist cafés and coffee houses, particularly those serving a more luxury or specialist offer (e.g. organic and Fairtrade). The strong independent coffee sector has fuelled many new start-up businesses in local centres. While many forecasters considered the café market to be saturated a few years ago, a recent study by management consultancy Allegra Strategies predicts that the total UK coffee shop market still has potential for strong growth, and there is forecast to be over 20,500 outlets by 2018, with a total turnover of £8.7 billion. There would therefore appear to be potential for further growth in the café market, driven mainly by branded coffee chain expansion and non-specialist operator growth.

12.13 Based on our audits of the District's five main town centres and the evidence provided by the local planning authority, the table below shows the current provision of Class A3 (restaurants and cafés), A4 (Pubs, bars etc.) and A5 (hot food takeaways) uses as a proportion of total outlets in each centre benchmarked against the Experian national average based on their audits of circa 2,500 UK centres and shopping locations.

²⁸ Source: Article published by CAMRA on 20th March 2013, www.camra.org.uk

²⁹ Source: Published results from the CGA-CAMRA Pub Tracker published in January 2015

³⁰ Source: Allegra Strategies

Table 12.2 Current Provision of Food and Beverage Uses (%)

Location	Class A3	Class A4	Class A5	Total A3-A5	
	Cafés & Restaurants	Drinking Establishments	Hot Food Takeaways	No. of Units	% of Total
Lowestoft Town Centre	7.1%	3.6%	5.0%	44	15.7%
Bungay Town Centre	8.3%	4.6%	3.7%	18	16.5%
Halesworth Town Centre	7.8%	2.2%	3.3%	12	13.0%
Beccles Town Centre	6.6%	1.6%	3.3%	21	11.5%
Southwold Town Centre	10.5%	1.3%	1.3%	10	13.2%
UK Average	8.8%	4.3%	5.7%	-	18.8%

12.14 As the table shows the food and beverage offer in all the main centres is below the Experian UK average of 18.8%. According to the evidence provision is highest in Bungay Town Centre (16.5%), followed by Lowestoft (15.7%), Southwold (13.2%), Halesworth (13.0%) and Beccles (11.5%). This simple benchmarking analysis suggests there is potential to improve provision in all the main centres.

12.15 The household survey also helps to identify where people living in the Study Area currently choose to eat and drink, and whether there are potential ‘gaps’ in the District’s offer. The headline results shows that a high proportion of respondents (79.0%) across the Study Area eat out every year and of this total 20.5% visit a café or restaurant at least once a week, 18.9% visit once a fortnight and 29.0% visit once a month. Norwich (19.6%), Lowestoft (17.3%) and Great Yarmouth (11.3%) are the main centres visited by respondents in the Study Area to eat out. However the responses varied significantly across the different zones. For example:

- Lowestoft was the main destination for eating out for respondents in Zone 3 (60.2%) and Zone 4 (56.8%), and only 9.7% and 3.4% respectively in these zones visited Norwich. This indicates that Lowestoft town centre is successfully retaining visitors from its primary/local catchment.
- In Zone 5 only 9.2% of respondents visited Lowestoft to eat out, with the majority of preferring Beccles (22.5%), Halesworth (17.6%), Bungay (13.4%) and Norwich (12%).
- Outside of the District the majority of respondents tend to visit their nearby town or city. For example those in Zone 1 mainly visited Great Yarmouth (36.2%); those in Zone 2 visited Great Yarmouth (31.6%) and Gorleston (25.7%), with only 8.8% visiting Lowestoft. Overall 64.3% of respondents in Zone 6 visited Norwich.

12.16 Some 47.3% of respondents in the Study Area visit pubs, bars and nightclubs. Lowestoft was the most visited across the Study Area (19.0%), followed by Norwich (15.2%), Ipswich (14%), Great Yarmouth (6.9%) and Beccles (6.6%). This is a positive sign that, despite the wider range of offer in Norwich, the main district town centre of Lowestoft and to some extent, the market town of Beccles has been successful in securing visitors for their evening economy. The survey found that respondents tended to visit pubs, bars and clubs in their closest main town:

- 76.2% and 44.0% in Zones 3 and 4 respectively visit Lowestoft;
- in Zone 5 some 38.9% visit Beccles and 17.6% visit Halesworth;
- in Zone 6, 45.0% visit Norwich; and
- in Zone 2, 28.4% visit Gorleston, 21.3% visit Great Yarmouth and 18.0% visit Lowestoft.

12.17 In summary the qualitative ‘gap’ analysis shows that all the main centres have the potential to increase their provision of quality cafés, restaurants, bars and pubs. Furthermore, evidence from other centres in the UK shows that improving a town centre’s food and beverage offer can significantly increase the attraction of daytime and evening economies, as well as encouraging higher footfall, dwell times and increased expenditure in centres by different customer profiles.

12.18 As a further indication of the potential capacity for new eating and drinking establishments in the District, we have assumed that between 15% and 25% of the forecast capacity for new comparison goods floorspace (as identified in **Section 11**) could support a mix of new leisure services, including cafés, restaurants, takeaways, pubs and wine bars. This assumption is supported by research that specifically identified that the hospitality industry, in its widest sense, “...forms an important and sizeable proportion of premises averaging 24% of ground floor stock”³¹. Furthermore Experian GOAD’s centre reports show that on average cafe’s, restaurants, bars, pubs and takeaways account for over 15% of floorspace and 18% of outlets in the circa 2,500 shopping areas that they cover. Based on the comparison goods capacity forecasts described in **Section 11**, the table below sets out the broad economic capacity forecasts for new Class A3-A5 floorspace in Waveney District.

Table 12.3 Eating & Drinking Out - Projected Gross Floorspace (m²)

	2021	2026	2031	2032
Comparison Goods Capacity (m² gross):	-1,970	5,706	14,113	15,804
Class A3-A5 Capacity at 15% (m ² gross):	-296	856	2,117	2,371
Class A3-A5 Capacity at 25% (m ² gross):	-493	1,426	3,528	3,951

Source: Derived from Tables 11 and 19, Appendix 9.

12.19 The table shows capacity for between 2,371m² and 3,951m² gross of new Class A3-A5 uses in Waveney District by 2032. This forecast need should be directed to the District’s main town centres, and principally Lowestoft, to help increase competition and choice, and stimulate each centre’s daytime/evening economies in accordance with national and local policies.

12.20 However meeting the identified economic need for new cafés, restaurants and bars will be highly dependent on the level of market demand and confidence in the centres as trading locations. In

³¹ The Streetscape of major UK cities’, Savills (Winter 2004, pg.3).

simple terms the more successful, vital and viable a centre is, the more likely it will be that café and restaurant operators will want to locate there. While new investment in Lowestoft Town Centre's food and beverage offer should be a priority over the plan period, the quality of the eating and drinking offer should also be maintained and enhanced across the other town centres at an appropriate scale to meet local demand, albeit that this will be subject to market interest and demand.

HEALTH & FITNESS NEED

12.21 The health and fitness market has generally performed well during the economic downturn. The latest statistics from the *Leisure Database Company* (LDC is a market research specialist for the leisure industry) show that over the twelve month period to March 2015, the industry has grown its total market value by 5.4% to £4.3 billion, its member base by 5.8% and the total number of facilities by 3.3%. According to LDC there were an estimated 6,312 private health clubs and public fitness centres facilities in the UK in 2015, which represented a small +3.3% net increase from the 6,112 facilities the previous year³⁸. The main operators in the market currently include:

- Esporta, Greens & David Lloyd Leisure – at the premium end of the market focus on health, racquet and tennis clubs;
- Virgin Active & Nuffield Health (previously Cannons) – dominate the mid-range family-oriented health and fitness market; and
- LA Fitness, Fitness First and Bannatyne's Health Clubs – operate smaller in-town clubs at the more value end of the market.

12.22 However, the most significant growth in the sector in recent years has been fuelled by value and budget operators. The new wave of ("no frills") fitness clubs includes EasyGym, Pure Gym, Fitness 4 Less, Finspace, TruGym and SimplyGym. Their business models are based on significantly discounted monthly subscriptions (of between £10 and £20 on average) and 24-hour opening. Although these clubs provide a basic offer (for example, they do not generally include fitness classes, personal trainers, swimming pools, saunas or steam rooms) they appear well suited to the current economic climate and are proving popular. According to LDC, the budget gym sector now accounts for 6% of total private clubs and 14% of private sector membership.

12.23 Overall, the proportion of the population in 2014 with a gym membership was estimated at 13.2%. According to LDC, the average number of members per club in the UK is estimated to be 1,426, which takes into account the average for independent venues (726 per club) and leisure chains (2,198 per club). For the larger fitness chains (e.g. David Lloyds, Virgin, LA Fitness, etc.) the

average club membership increases to 2,897, while budget chains are even higher at 3,452 members³².

12.24 The rapid growth of this sector has also been characterised by a marked shift in the location of clubs from out-of-centre locations to town centres, often as part of wider mixed use developments. This is helping to create a wider range of attractions and activity in town centres, particularly in the evenings and at weekends. More flexible planning policies will therefore need to be introduced which help to encourage an element of such uses within existing buildings or as part of mixed use schemes.

12.25 The table below summarises the current representation of the main national, regional and independent privately-owned health and fitness operators in each District's main town centres, as well as Council-owned leisure centres.

Table 12.4 Leisure Centres, Fitness Clubs & Gyms in the Districts

Facility	Location	Private Sector	Public Sector (or Trust)
Bannatyne Fitness	Lowestoft	✓	
Barnards Centre Point	Lowestoft		✓
Better Body Gym	Lowestoft	✓	
Colosseum Gym & Fitness Centre	Lowestoft	✓	
Denes Oval Sports Ground	Lowestoft		✓
Normanston Park Sports Ground	Lowestoft		✓
Pro Fitness Gym	Lowestoft	✓	
Ultimate Boxing & Fitness Gym	Lowestoft	✓	
Waterlane Leisure Centre	Lowestoft		✓
Nirvana Fitness	Lowestoft	✓	
Beccles Sports Ground	Beccles		✓
Bungay Pool and Gym	Bungay		✓
Gem Fitness	Southwold	✓	
Nirvana Fitness	Southwold	✓	

Source: Various.

12.26 The health and fitness offer is concentrated in the main towns and urban areas. There is a particularly good provision of trust-run leisure facilities, which account for nearly half of the facilities. Lowestoft has the widest range of gyms and the highest level of provision; with ten providers out of the total of 14 across the District.

12.27 The survey results indicate that Bannatyne Fitness and Waterlane Leisure Centre in Lowestoft were the most frequent gyms in the Study Area, with a market share of 8.1% and 7.7% respectively. Both Bannatyne Fitness and Waterlane Leisure Centre have added attractions of a pool in addition to gym, fitness studio and spa facilities. Despite the growth of privately managed gyms in the UK, it is notable that Banatyne Fitness is the only major branded health and fitness club in Lowestoft. There

³² Sourced from the 2014 State of the UK Fitness Industry, the Leisure Database Company.

would therefore appear to be significant potential for other branded health and fitness clubs; such as David Lloyd, Fitness First, LA Fitness and Virgin Active.

12.28 Analysis of the household survey results also show that 79.5% of respondents across the Study Area do not go to a gym or health club. Of the 20.5% that do go to the gym, the facilities visited in the main centres include

- In Zone 3 (North Lowestoft), some 42.3% of respondents visited the town generally for their health and fitness needs, a further 21.6% visited Waterlane Leisure Centre and 21.5% visited Bannatyne Fitness.
- In Zone 4 (South Lowestoft) 23.4% visited Nirvana Fitness in Lowestoft; 28.2% visited Waterlane Leisure Centre and only 10.4% visited Bannatyne Fitness. The facilities located in Lowestoft have a relatively high retention rate.
- In Zone 5, 19.3% visit Bungay Pool and Gym and 4.4% visit Bannatyne Fitness. Overall 30.1% of respondents used Bungay Town Centre and 28.0% used Lowestoft Town Centre generally for their fitness needs.
- In Zone 2, 30.7% used Gorleston Town Centre and 23.1% used Great Yarmouth Town Centre in general.
- In Zone 6, the area closest to Norwich, 29.47% used Norwich City Centre for fitness and 16.0% use Bungay Pool and Gym.

12.29 As for the other leisure sectors, attracting new health and fitness facilities will be determined by the level of market interest and demand. However, given that some of the larger chain operators are not represented in Waveney District, there may be scope for a new facility. There could also be potential to attract a budget or value operator to the main town centres, as this type of facility would appeal to a wider customer base. In turn this could help to increase participation and/or capture some of the 'leaked' trips to health and fitness facilities outside the District.

BINGO & GAMBLING NEEDS

12.30 Gambling represents a significant element of the leisure industry. The main sectors of the gambling industry comprise '*games of chance*' (i.e. bingo clubs, casinos, betting shops, amusement arcades, etc.). We briefly describe the key trends in this sector and the forecast need/demand for new facilities in the District, if any, based on the available evidence.

12.31 The latest research by The Gambling Commission (Industry Statistics November 2014) indicates that there are over 653 licensed bingo premises in operation in the UK, which is a reduction of 25 premises over the last 12-18 months, despite a previous long term trend of increasing numbers of venues. Research by Mintel indicates that the industry has experienced a fall in revenues and admissions over recent years as a result of legislative changes (such as the ban on smoking in

public places), the impact of the economic downturn and the growth of online gaming. In response to falling admissions, bingo operators are increasingly taking advantage of the online market and embracing smart-phone technology through new 'app' development. This forms part of a wider trend and growth in 'remote/online' gambling, which including gambling activities through the internet, telephone, radio, etc. Bingo operators are also increasingly looking to diversify their customer profile, and are marketing their clubs at a younger, predominantly female audience. As a result there has been an increase in the number of younger and more affluent bingo players over recent years, particularly as deregulation has enabled clubs to offer bigger (national) prizes.

12.32 As far as we understand the District currently has one bingo facility, the Beacon Bingo Club in Lowestoft. The survey results indicated that 25.3% of those who played bingo were using this facility. Outside of the district, 2.8% visited Mecca Bingo in Great Yarmouth and 20.1% visited Palace Bingo, also in Great Yarmouth. The household survey results also indicate that 14.6% of respondents said they visited Great Yarmouth in general for such leisure activities. The survey shows that Great Yarmouth is the most popular location for bingo and gambling activity (37.5% of respondents).

12.33 In terms of Casinos, research shows that there were some 147 active casinos in the UK in March 2014, which represents an increase by three premises on the previous 12 months. The number of premises has remained fairly static over the past five years³³. This sector is dominated by three companies: the Rank Group (incorporating Grosvenor Casinos and Gala Coral Casinos); and Genting UK. There has been consolidation of the sector in the past few years, with acquisitions such as Rank Group's purchase of Gala Coral Casinos making it the largest operator in the UK. The number of admissions to casinos increased substantially by 25% over the five year period up to 2010/11. This growth is largely explained by larger new casino venues granted licences under the 2005 Gambling Act. As far as we are aware there are no casinos located within the District's main centres.

12.34 The household survey results indicate that bingo and casino gambling is not a major leisure activity for the majority of respondents living in the district, with some 8.4% indicating that they frequent bingo clubs, casinos or bookmakers. Of those that do, 21.8% visit once a week, 10.4% once a fortnight and 28.6% once a month. In our judgement, there is no demonstrable need to enhance existing provision to improve competition and choice at the local level, although this will be subject to market interest and demand from other bingo and casino operators. If demand arises in the future, we advise that this should be directed to the Districts' main centres first in accordance with national and local plan policy.

³³ Source: Gambling Commission Industry Statistics November 2014.

TEN-PIN BOWLING

- 12.35 Tenpin bowling has been established as a commercial leisure activity in the UK for over 40 years and remains a strong family and group activity. Research shows that there are currently over 321 bowling centres in the UK³⁴. This sector benefited from a period of growth from the mid-1990s onwards, fuelled by the development of large entertainment 'boxes' and leisure parks at one end of the spectrum, and smaller independent specialist bowling facilities at the other end. A number of the successful bowling facilities opened over the last 15-20 years tend to form part of larger leisure complexes that include multi-screen cinemas, restaurants and nightclubs. It is the critical mass of leisure uses under one roof or as part of leisure parks that helps to underpin the viability of ten-pin bowling centres, which can struggle as standalone attractions. Examples of the smaller specialist operators include All Star Lanes which operates five bowling venues in the UK (four in London and one in Manchester) and largely targets the corporate/private hire market. Bloomsbury Bowl Lanes also operates from smaller venues with sites in Bloomsbury (8 lanes) and Bristol (5 lanes). The company offers a 1950's American-themed bowling venue with ancillary karaoke rooms, venue rooms for hire, DJ booths, bars, small scale cinema and a venue for bands and live performers/comedy nights.
- 12.36 There is one ten-pin bowling facility located in the district (Richardson's Family Entertainment Centre and Bowl in Lowestoft). Alternative provision outside of the District is located in Norwich (Hollywood Bowl), Ipswich (King Pin Bowling Centre) and Great Yarmouth (Regent Superbowl).
- 12.37 The household survey indicates that family entertainment activities (such as tenpin bowling and ice skating) are a reasonably popular leisure activity, with 30.1% of respondents living in the Study Area indicating that they partake in such activity. Facilities in Lowestoft capture the majority of trips made by residents in the Study Area with 21.2% of respondents visiting the Richardson's Family Entertainment Centre (tenpin bowling centre). Of these visits 58.7% of respondents in Zone 3 and 65.5% in Zone 4 use the facilities in Lowestoft, along with 32.6% of respondents in Zone 5. The Norwich facility also captures a high amount of visits (20.4%) and Great Yarmouth captures 13.4%. Of those in the Study Area that do visit family entertainment facilities, they go relatively infrequently with 23.2% visiting once every two months, 26.1% visiting once every six months and 16.0% once a year or less.
- 12.38 In terms of future needs, the District is well served by local provision in Lowestoft and by provision in neighbouring large towns. However, as the economy strengthens and as the population increases there may be a need for an additional facility over the long term. If this is the case and market demand exists, then a new facility should be directed to the main town centres first to help maintain and strengthen their diversity of offer and evening economies.

³⁴ Tenpin Bowling Market UK, Mintel (November 2012)

CULTURAL ACTIVITIES

- 12.39 The results of the household survey indicate that 47.7% of respondents in the Borough engage in cultural activities such as visiting the theatre, concerts or a music venue. Some 28.2% visit museums, galleries or places of historical and/or cultural interest. The household survey confirms that this form of activity is carried out infrequently, with the majority of respondents visiting places of cultural interest once every six months (36.9%); and theatre, concerts or music venues every two months (26.7%).
- 12.40 Respondents are also more likely to visit music/theatre venues in Norwich (45.3%), although 23.4% also visited Lowestoft. Central London (28.9%) or Norwich (20.7%) were also the most popular for those visiting cultural or historic venues. Very few respondents visited the District's more local facilities; the most popular are the East Anglian Transport Museum, Lowestoft (0.8%), Halesworth Airfield Museum (0.6%) and the Southwold Museum (0.5%).
- 12.41 In terms of theatres and music venues, the majority (39.1%) visited Theatre Royal, Norwich and 21.6% visited The Marina Theatre in Lowestoft. Demand for new cultural facilities (such as theatres) is likely to be limited given the draw to major facilities in Norwich and the general popularity of the theatre in Lowestoft. However there would appear potential for local cultural and entertainment facilities (such as the theatres, museums and cinemas) in the District's main centres to be marketed and promoted more widely, as this could help to increase awareness of their offer and thereby attract more visitors to the towns.

HOTEL PROVISION

- 12.42 Hotel provision in Waveney District includes a range of operators, from branded budget hotels to niche independents. Provision varies throughout the five centres:
- **Lowestoft:** Both Premier Inn and Travelodge are located in Lowestoft and it is the only town within the District to have branded operators. However accommodation is mainly distributed outside the town centre and there is limited choice of higher quality accommodation.
 - **Bungay:** Hotel provision in Bungay is limited with only one independent provider; The Castle Inn, which is a public house with guestrooms. There is also 'Short Stay Bungay' which provides apartments to rent for short periods of time.
 - **Beccles:** Hotel provision in Beccles is generally of a high quality with provision including independent boutique hotels and a 16th Century manor house (The Waveney House Hotel). Although there is one budget accommodation provider (The Kings Head Hotel operated by JD Wetherspoon), there is a need for additional hotel development as the current provision often reaches full capacity.

- **Halesworth:** There is a limited supply of hotel accommodation in Halesworth with only one hotel in the town centre (The Angel Hotel).
- **Southwold:** Southwold has adequate hotel provision which is dominated by independent operators. Generally, the provision is of a high quality and complements the town's role as a major tourist destination.

12.43 In summary based on our high level assessment there would appear to be scope to expand the number and quality of the District's hotel provision, particularly in Lowestoft and Beccles Town Centres.

SUMMARY

12.44 As for retailing, the commercial leisure industry faces considerable challenges and pressures, even as the economy improves. It is clear that consumers are becoming increasingly selective in terms of where and how they spend their discretionary leisure spending. There will also be a continued increase in competition from 'in-home' leisure activities due to the advances in computers, tablets, television, gaming, and audio technology. The challenge for town centres and leisure operators in the future will therefore be to attract customers away from their homes to attractive, exciting and safe leisure facilities.

12.45 The table below shows the percentage of the respondents to the household survey in the wider Study Area who indicated that they participate in the various leisure activities.

Table 12.5 Respondents in Study Area who participate in leisure activities

Leisure Activity	% who do participate in these activities
Eating out in restaurant and/or café	78.5%
Concert/theatre/music venue	47.7%
Cinema	49.4%
Drinking out in a pub/bar/nightclub	47.3%
Family entertainment (incl. ten pin bowling, skating rink)	30.1%
Museum/gallery/place of historical or cultural interest	28.2%
Gym/health club/ sports facility	19.7%
Bingo/casino	8.4%

Source: HTIS 2015

12.46 The table shows that eating and drinking out, going to the theatre/concerts and visiting the cinema are the most popular leisure activities. In contrast a much smaller proportion of the Study Area's residents regularly visit the gym/healthclub, and/or a bingo/casino.

12.47 The fact that participation rates for certain leisure activities is particularly high (e.g. restaurants and cinemas) points to the potential to enhance the overall offer in the District's main centres.

- 12.48 Potential demand has been identified for eating and drinking out, and this would help to enhance each centre's day and evening time economies.
- 12.49 The promotion of quality food and beverage branded operators in the District should be promoted to help maintain and enhance the town centre's overall vitality and viability, subject to market demand. New food and beverage outlets should be directed to the larger centre of Lowestoft as a priority, preferably as part of more comprehensive mixed use developments. However, increased provision should not be to the detriment of the mainly independent businesses in the four smaller market towns, as they help to give these centres a unique character, which should be protected. Beccles and Southwold in particular have an attractive historic character that has attracted high end boutiques and independent food and beverage occupiers that are supporting the vitality and vibrancy of these centres. Maintaining the current high quality of provision should be the focus for leisure occupiers in these smaller centres.
- 12.50 In terms of cinema provision, the needs assessment has identified that although a high proportion of respondents in the Study Area visit the cinema, the most popular venues are the Odeon IMAX (33.4%) and Vue (10.6%) multiplexes in Norwich and Hollywood Cinema in Great Yarmouth (14.0%). Lowestoft's main 4-screen cinema (East Coast Cinema) is achieving a lower market share of 8.7% and is outdated by modern standards. The joint theatre and cinema venue (Marina Theatre) captures 6.3% of trips, with the smaller 'art-house style' cinemas in the District achieving much smaller market shares; for example, the Fisher Theatre (Bungay) and Electric Picture Palace (Southwold) are each achieving market shares of 0.1%. Due to the popularity of this activity and the absence of a modern multi-screen provision in the District, there is an opportunity to increase cinema provision. This should ideally be provided in or on the edge of Lowestoft Town Centre, depending on the availability of sites and the level of market interest and demand from cinema operators.

13 ACCOMMODATING IDENTIFIED NEEDS

- 13.1 The section draws on the findings of the quantitative and qualitative needs assessment for retail, commercial leisure and other town centre uses, and broadly identifies the potential to accommodate the forecast needs in the District's main town centres.
- 13.2 It should be noted that for the purpose of this strategic study we have only provided an overview of potential sites known at this stage that could accommodate new retail-led mixed use development based on their size, location, existing land uses and planning history. We have not carried out any detailed market and/or financial viability testing to assess the potential deliverability or phasing of new development on the identified sites. We have also not consulted with existing landowners to assess whether there are any potential land assembly constraints and/or identified whether the local planning authority may have to use wider CPO powers to help unlock the potential of some of the key sites. In most cases, as the local planning authority is aware, more detailed assessment and testing will be required. There may also be a need to prepare planning and development briefs, Area Action Plans (AAPs) or other planning-led reports for some of the sites to help procure developer, investor and market interest.

POLICY CONTEXT

- 13.3 The NPPF (paragraph 23) requires that local authorities proactively plan to promote competitive town centre environments and allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. The NPPF states that it is important that needs for retail, leisure, office and other main town centres uses are *"met in full and are not compromised by limited site availability"* and that local planning authorities should therefore undertake *"an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites"*. Furthermore, where suitable and viable town centre sites are not available local planning authorities are advised to *"allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre"*. If sufficient edge of centre sites cannot be identified, then local planning authorities should *"set policies for meeting the identified needs in other accessible locations that are well connected to the town centre"*.
- 13.4 The PPG expands on the advice in the NPPF and states that in determining whether a town centre can accommodate the scale of assessed need for main town centre uses consideration should be afforded to the potential to expand centres, and/or development opportunities to enable new development or redevelop existing under-utilised space. It is also important to consider the timeframe for providing new retail floorspace. Where needs cannot be met in existing centres, due to physical or other constraints, then development in edge and out of centre locations will need to be assessed in accordance with the sequential approach, ensuring that the proposed main town centre uses are *"in the best locations to support the vitality and vibrancy of town centres"*.

POTENTIAL DEVELOPMENT OPPORTUNITY SITES

- 13.5 The quantitative retail capacity assessment has identified the potential for the following new retail (comparison and convenience goods) floorspace in the District over the forecast period.

Table 13.1 Waveney District – Retail Floorspace Capacity

	2021	2026	2031	2032
Comparison Goods Capacity (m ² net):	-1,379	3,994	9,879	11,063
Convenience Goods Capacity (m ² net): ⁽¹⁾	850	1,566	2,122	2,197
TOTAL FLOORSPACE CAPACITY (m² net):	-529	5,560	12,001	13,260

Notes: Superstore format floorspace only.

- 13.6 In order to inform the most appropriate allocation of sites, the District-wide retail floorspace capacity forecasts have been further disaggregated on a centre-by-centre basis. The combined results for total retail (convenience and comparison goods) retailing are summarised in the table below.

Table 13.2 Waveney District's Main Centres: Total Retail Capacity (m² net)

	2021	2026	2031	2032
Lowestoft:	-1,143	3,148	7,754	8,663
Beccles:	389	1,347	2,308	2,492
Bungay:	69	283	503	546
Halesworth:	89	471	873	950
Southwold:	22	167	322	353
Other District, Local and Village Centres	46	143	239	257
TOTAL DISTRICT-WIDE CAPACITY (m² net):	-529	5,560	12,001	13,260

Notes: Figures may not sum due to rounding.

- 13.7 The forecasts confirm that Lowestoft is the main focus for new retail floorspace capacity, which reflects its role as the largest town and main shopping centre in Waveney District's retail hierarchy. The leisure needs assessment has also identified the potential for a new state-of-the-art multiscreen cinema in Lowestoft, along with high quality food and beverage uses and a hotel in the town centre.
- 13.8 There is also a potential need to accommodate approximately 1,347m² net in Beccles by 2026, increasing to 2,492m² net by 2032; which also reflects its role as the largest market town in the District. Halesworth has the next highest identified capacity, with the potential need for 950m² net by 2032.
- 13.9 The identified needs for the other smaller market towns, district, local and village centres is relatively small scale and we believe that this need can largely be accommodated through infill development and/or modest extensions to existing stores/buildings where possible.
- 13.10 As a result our assessment of potential development opportunity sites has necessarily focussed on Lowestoft and Beccles, although we do also consider the potential for the development of the

longstanding Thoroughfare site in Halesworth to deliver new retail-led mixed use development over the short to medium term.

Lowestoft Town Centre

13.11 We are aware of seven potential sites in and on the edge of Lowestoft Town Centre that could have the potential for future retail and commercial leisure led development. These sites are shown in the plans attached to **Appendix 10** of this study. Although it is inevitable that more sites will become available over the Plan period, we can only consider those sites identified for the purpose of our assessment.

13.12 We broadly consider the planning and development merits of each of the identified sites (Sites A-G) in more detail below.

Site A: Belvedere Road Car Park

13.13 Belvedere Road is a large car park close to London Road South. It is near to the Asda and Dunelm Mill retail outlets as well as shops on London Road South. It is an out-of-centre site in retail planning terms and in our judgement it is not close enough to the town centre or well connected to encourage linked trips. Development of this site would also lead to a loss of car parking which could be an issue. In summary we do not consider that this site is a suitable location and/or a priority for new retail-led or commercial leisure development to accommodate the identified need.

Site B: Peto Square

13.14 Peto Square is allocated for retail and leisure led regeneration in Policies RLT1 and SSP2 of the *Lake Lothing and Outer Harbour Area Action Plan*. The site covers approximately 6.6ha and comprises the area north of Lake Lothing, including land north of Town Quay comprising the Railway Station, Station Square, Commercial Road (including former Aldi site and Custom House). The area contains a number of secondary retail and town centre uses, but its accessibility and attraction suffers from the effects of through traffic on the A12. Much of the area is also designated within the Lowestoft South Conservation Area and many of the Victorian era buildings are now listed buildings or recognised as being of local historic interest. Despite this the majority of buildings have been identified as being in poor condition and are under-utilised.

13.15 Retail development in this location would form a natural southwards extension to the main shopping area, although this would have to address the need for greater connectivity with London Road North and the primary shopping area. Although this site is allocated in the AAP and clearly has the potential to accommodate a significant quantum, if not all, of the forecast need for new retail floorspace and leisure uses over the plan period, we understand that the delivery of development has been impacted by the difficulty in securing agreements with the numerous landowners in the area.

13.16 Notwithstanding the difficulties experienced in bringing forward this site since the AAP was adopted in January 2012, we nevertheless remain of the view that Peto Square has the potential to accommodate significant new retail, leisure and mixed use development over the medium to long term. We therefore advise that the Council considers commissioning a planning and development brief for the site to help procure developer interest and funding.

Site C: Britten Shopping Centre

13.17 The Britten Shopping Centre opened in the mid-1980s³⁵ and is situated between the library and London Road North, and is located within the town's primary shopping area. The Marina Theatre, town centre shops and railway station are all within easy walking distance. Although identified by the local planning authority as a potential opportunity site, the comprehensive redevelopment of the shopping centre over the plan period is highly unlikely, as the centre is performing well and vacancy levels are low. Notwithstanding this, the new owners of the shopping centre may have an asset management strategy which involves redevelopment and/or refurbishment. On this basis the local planning authority should engage with the owners at the earliest opportunity to better understand their short, medium and longer term plans for the shopping centre, and the potential for the expansion of its retail floorspace to help meet some of the need identified by the retail capacity and leisure needs assessment.

Site D: Britten Centre Multi Storey Car Park

13.18 The Britten Centre Multi Storey Car Park is currently operated by NCP and is accessed via Clapham Road³⁶. This site is close to the main town centre shopping area and Britten Shopping Centre. Although potentially a large site that offers the potential for redevelopment, it is currently in use and would therefore only be available if released by NCP. Redevelopment would also remove a valuable source of conveniently located parking at a time when Council-owned car parking is subject to review. Based on its current active use and ownership we do not consider that this site has the potential for redevelopment to accommodate the identified needs over the plan period.

Site E: Surface car park next to Clapham Road South

13.19 This Council-owned surface car park sits within the town centre boundary and is within walking distance of London Road North, the Britten Shopping Centre, main library and bus station. Although edge of centre in retail planning terms we consider that the site does provide a short/medium term opportunity for new retail/commercial-led development to help meet the identified need. However redevelopment of this site would lead to a loss of Council-owned car parking and an important revenue stream for the Council.

³⁵ Permission granted in 1983 (DC/83/0532/OUT) for the redevelopment of the 3.6 acre site for a shopping centre, multi storey car park, open market, bus terminus and public lavatories. Subsequently subject to a reserved matters application (DC/84/0611/ARM).

³⁶ Permission granted in 1978 (DC/78/0895/HIS).

13.20 On this basis we advise that more a more detailed assessment be carried out to better understand the potential capacity of the site to accommodate new retail/leisure-led mixed use development, including the re-provision of all or part of the existing car parking and the capacity for new residential and/or uses above active ground floor uses. As part of this assessment, which could take the form of a planning and development brief for the site, we advise that detailed market testing of potential occupiers and end uses be carried out to help identify the most viable and suitable development option for this site.

Site F: Battery Green Car Park

13.21 This multi-storey car park is bordered by the A12 (Battery Green Road) and Gordon Road on a key gateway site to the town centre. It is within easy walking distance of the town centre and we understand that the car park is currently underused. There may therefore be the possibility for part of the building to be converted for use for retail development or a more comprehensive redevelopment of the site, subject to the loss of any car parking capacity being accepted.

13.22 Currently the redevelopment of this site for new retail and commercial leisure floorspace represents a medium to longer term prospect in our view. We advise the Council that more detailed viability and market testing is required if plans for this site are to be progressed. This may also involve the preparation of a planning and development brief to help procure developer, investor and occupier interest.

Site G: Triangle Market

13.23 The Triangle Market is located in the northern part of the town with the High Street crossing its eastern side. The Triangle Market and the southern part of the High Street are both pedestrianised, but they are separated from the main shopping area on London Road North by the A12 'barrier', which has impacted on the vitality and viability of the High Street over time due to reduced trips and footfall. We also understand that large awnings erected at the northern end of the Triangle Market to shelter market stalls remain largely unused, possibly because they are separated from the rest of the market place by a road that comes off the High Street³⁷.

13.24 The local planning authority has identified the potential for retail-led redevelopment of this site to serve the immediate surrounding area. Based on our high level assessment of the site and our visits to High Street/St Peter's Street, we consider that this area does provide good potential for redevelopment. In our judgement it is not contributing as much as it should or could to the overall vitality and viability of the southern part of the High Street. As a result it is failing to draw shoppers and footfall from London Road North across the A12 'barrier'.

³⁷ Construction of new market stalls/covered space and replacement public toilets granted permission in 2002 (DC/02/0027/RG3)

- 13.25 As it is currently drawn, Site G only provides limited opportunity for infill development in our view. If the site could be extended to include adjacent properties (such as the Mattressman Bed Superstore) then this would create a larger site with the potential to provide a more comprehensive and viable development proposal. A larger site could potentially incorporate a medium-sized foodstore, for example, that would help to anchor the High Street's shopping offer and generate footfall and linked trips to the benefit of other shops and businesses trading on the southern part of the High Street. There may also be potential to reimagine and reprovide a viable street market and/or indoor market in this area to help draw more visitor numbers and generate increased footfall. The area could also offer the opportunity to provide an attractive events space, within a high quality environment.
- 13.26 On this basis we also recommend that the Council carry out more detailed assessments of the potential to incorporate other adjacent buildings and uses to create a larger site capable of accommodating a critical mass of floorspace and uses with the potential to anchor the High Street, and underpin its overall vitality and viability.

Beccles Town Centre

- 13.27 The former Fibrenyle site (Site H, **Appendix 10**), located between Gosford Road and Blyburgate in Beccles Town Centre could have the potential to accommodate new retail-led development. The site occupies a large area of land to the south of Beccles town centre, stretching between Blyburgate and Gosford Road. Much of the southern portion of the site is occupied by a Roys of Wroxham store³⁸ and a council car park, meaning that only the northern part of the site remains vacant.
- 13.28 Based on our visits to the site and town centre, we consider that it does have the potential to accommodate new retail-led development. This could take the form of an extension to the existing supermarket, or there may be potential to provide a larger format non-food unit. This will however need to be subject to more detailed market testing. The delivery of new retail-led development on this site may also have been impacted by the opening of Tesco which has shifted the town centre's retail 'gravity' northwards, away from Blyburgate, resulting in this site potentially becoming more 'isolated' from the town's primary shopping area.
- 13.29 We have also identified the need to improve the connections between the new Tesco store and modern retail units focussed on the northern part of Smallgate/Newgate, with the town's traditional prime shopping area on New Market. Improving the active frontages along Market Street and the southern section of Smallgate should be a priority for the Council over the short/medium term to help maximise the benefits generated by Tesco in terms of linked trips and expenditure. In this context we have identified that there could be the potential for small-scale infill developments along Market

³⁸ Permission granted for the construction of a supermarket, storage area and car park (DC/86/0683/OUT); construction of retail supermarket with car parking (DC/87/0598/FUL); demolition of existing food store, erection of seven new retail units totalling 4645 square metres, 14 residential flats with car parking and ancillary works (not implemented) (DC/05/0437/OUT); and installation of fencing to create an enclosed area for the sale of bedding plants and associated produce to the west of the shop entrance (DC/15/4088/FUL)

Street and Smallgate to create commercial ground floor uses, with residential and office uses above. For example, Suffolk County Council occupies 1 Market Street which could present an opportunity for redevelopment. The surface car park on Smallgate also could offer the potential for infill development. This will, however, be subject to more detailed assessment and testing by the local planning authority.

Halesworth Town Centre

- 13.30 The Thoroughfare site within the town centre (Site I, **Appendix 10**) is identified as having the potential to accommodate the forecast need for new retail and leisure led development. The site is within easy walking distance of the main shopping street and comprises a Council-owned surface car park to the north of the site, and various businesses with associated car parking on the southern part of the site. The site was the subject of a planning permission for a supermarket granted on appeal in 2002³⁹. Although not allocated for retail this site is also identified by the adopted Local Plan as the favoured location for new retail development in Halesworth.
- 13.31 Based on our knowledge of the planning history of the site and our various site visits, we consider that the Thoroughfare site does represent a significant opportunity to provide new retail and/or leisure led development. A high quality scheme in this location would help to anchor the town centre's offer and generate linked trips and expenditure to the benefit of existing businesses and services. Any scheme proposed for this site would need to be sensitively planned and designed, and include the provision for replacement car parking.
- 13.32 Given that there is has been a marked delay in delivering the extant planning permission for a foodstore on this site, we advise that the Council should take a more proactive role in identifying potential development opportunities and occupiers for this site in its role as a key landowner. This will involve more detailed market testing and possibly the preparation of an up-to-date planning and development brief to help attract developer and investor interest.

³⁹ DC/00/0685/OUT - Outline planning permission for a supermarket. This application was refused planning permission but granted permission on appeal (decision APP/T3535/A/01/1064173). This permission has been kept alive by approval of reserved matters application DC/05/0718/ARM, which has not yet been decided.

14 DEFINITION OF SHOPPING FRONTAGES & BOUNDARIES

14.1 This section provides recommendations on the most appropriate definition and extent of the Primary Shopping Frontages (PSFs) and Secondary Shopping Frontages (SSFs) in the main town centres of Lowestoft, Beccles, Bungay, Halesworth and Southwold. Drawing on the available evidence it also provides guidance on the extent of the Primary Shopping Areas (PSAs) and wider Town Centre Boundaries. This assessment has been carried out in accordance with the advice and guidance set out in the NPPF and PPG.

POLICY CONTEXT

14.2 In setting out policies for the management and growth of centres over the plan period, and promoting competitive town centre environments, local planning authorities are required by the NPPF (paragraph 23) to define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations.

14.3 The NPPF (Annex 2) defines primary and secondary frontages as follows:

- **Primary Shopping Frontages (PSFs)** - likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods.
- **Secondary Shopping Frontages (SSFs)** - provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

14.4 The difference between the definition of the Primary Shopping Area and Town Centre Boundary is defined by NPPF (Annex 2) as follows:

- **Primary Shopping Area (PSA)** - the area where retail development is concentrated and generally comprises the PSFs and those SSFs which are “adjoining and closely related to the primary shopping frontage”.
- **Town Centre Boundary (TCB)**⁴⁰ – defined as the area on the local authority’s proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.

14.5 The definition of a centre’s PSA and TCB is important in retail planning terms in a number of important respects:

⁴⁰ References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

- First, for the purposes of plan-making and development management, sites and applications for new retail, leisure and other main town centre uses that are not in an existing centre and not in accordance with an up-to-date Local Plan will be subject to the sequential and impact 'tests' in accordance with the NPPF (paragraphs 24-27).
- Second, in terms of applying the sequential approach for both plan-making and decision-taking, an '**edge-of-centre**' site is defined for retail purposes by the NPPF (Annex 2) as a location that is "well connected and up to 300 metres of the primary shopping area". For all other main town centre uses it is a location "within 300 metres of a town centre boundary"; and for office development, it includes "locations outside the town centre but within 500 metres of a public transport interchange". The NPPF states that in determining whether a site falls within the definition of edge of centre, "account should be taken of local circumstances", and preference should be given to "accessible sites that are well connected to the town centre" (NPPF, paragraph 24).
- Third, defining the extent of the PSF and PSA for town centres will also enable local planning authorities to manage Permitted Development Rights (PDR), principally from retail to residential use.

14.6 It is against this policy background and guidance that we have necessarily reviewed and identified the extent of each centre's primary and secondary shopping frontages, PSA and Town Centre Boundaries. Our assessment has been based on the robust evidence provided by Waveney District Council, including the Retail Factsheets and audits detailing the current mix of Class A uses in each of the main centres on a street-by-street basis. This has been further supplemented by our health checks and site visits of the main centres during 2015.

DEFINITIONS OF FRONTAGES, PSA AND TOWN CENTRE BOUNDARIES

14.7 Our recommendations are set out below for each centre. This has been informed by the more detailed tables and the plans set out in **Appendix 11** for each centre.

Lowestoft Town Centre

14.8 As described in Section 5, the *Town Centre Boundaries Background Paper* defines 'core' and 'main' shopping streets for Lowestoft, as opposed to primary and secondary frontages. By way of summary, London Road North was identified as the core shopping street, with the main shopping street extending north and south from London Road North to include the High Street and Station Square⁴¹.

⁴¹ Policy DM11 of the adopted Development Management Policies Document (January 2011)

14.9 As **Appendix 11** shows, we broadly agree with the previous definition of the town's 'core' shopping street and have identified a PSF that extends along the majority of London Road North (LRN) as follows:

- On the west side of LRN the PSF extends from McDonalds (nos.35-37) at the junction with Station Square, up to an including Beales Department Store (nos.141-142). The PSF also incorporates The Britten Centre, including the market; and
- On the east side of LRN we consider that the PSF should extend from the HSBC Bank (no.34) up to an including no.168 LRN (PJ Gillman Jewellers).

14.10 We advise the Council that there could be a case for reducing the PSF on the east side of LRN, such that it only extends as far as no.122 (Bon Marche), as the quality of frontages and uses beyond this store are mixed. Notwithstanding this, in defining the extent of the PSFs we have allowed for the location and draw of the Beales store on the west side of LRN, which does help to generate footfall along this part of LRN. We therefore consider it is important to maintain and enhance the quality and mix of Class A uses on the east side of the street.

14.11 The table in **Appendix 11** provides a more detailed breakdown of the Class A uses on the main primary shopping streets in Lowestoft, and the analysis confirms that the western side of LRN (nos.35-141) has a high proportion (73%) of Class A1 retail uses. In comparison 60% of frontages on the eastern side of LRN (nos. 34-168) are classified as A1 uses based on the latest evidence. The Britten Centre also has 63% of uses classified as A1 retail. The table also shows that within the defined PSF an average of 65% of total units are in Class A1 use and 18% are comprised of a mix of A2-A5 uses.

14.12 In terms of the definition and extent of the towns SSFs, the plan shows that the following streets have a more secondary shopping function:

- To the south of LRN the SSFs extend along Suffolk Road and Bevan Street East, and the properties fronting Station Square. The SSF also includes the mix of properties to the south of Station Square and the properties running along Commercial Road. However at present there are only a small number of retail frontages and uses on Commercial Road. This area therefore functions more as a stand-alone parade of shops, rather than as an integral part of the town's defined shopping area meaning there could be a case for reducing the SSF along Commercial road and south of Station Square.
- To the north of LRN the SSFs extend on the west side of the street from no.143 (Aldreds Estate Agents) to no.185 (Cooks), at the junction with the A12. On the east side the SSFs extend from no. 170 (The Volunteer PH) to no.182 (The Welcome PH).

14.13 The SSFs could also be extended to include the mix of properties to the south of Station Square and the Railway Station, running along Commercial Road. However this will be dependent on the potential redevelopment of this area for a mix of retail and town centre uses that are well connected to, and fully integrated with LRN. At present there are only a small number of retail frontages and uses on Commercial Road. This area therefore functions more as a stand-alone parade of shops, rather than as an integral part of the town's defined shopping area. Based on the NPPF's definitions, small parades of shops of purely neighbourhood significance should be excluded from town centres.

14.14 Turning to the High Street, located to the north of LRN and the A12 'barrier', we advise that the frontages here should be defined as SSFs for retail purposes as this will allow greater flexibility in the management and development of this historic part of the town centre. In terms of the extent of the SSFs, we consider that it should run from no.108 (The Wheatsheaf PH) on the east side of the High Street, up to and including 41 High Street (Broadland Aquatics). On the west side of the High Street we consider that SSF should extend from nos.113-114 (Access) at the junction with the A12, up to and including 149 High Street (Lowestoft Off Licence) at the junction with Crown Street East.

14.15 Plan 1 (**Appendix 11**) shows the recommended boundary of the PSA based on the defined primary and secondary frontages. The PSA extends along LRN from the junction with Station Square to the south, up to the junction with Milton Road East on the west side of LRN, and no.168 (Gillman Jewellers) on the east side. Although we have not included any of the High Street within our defined PSA, we nevertheless consider that there could be an opportunity to extend the PSA further. However this will be dependent on strengthening the attraction and footfall along the High Street, and improving the connections and integration with the defined PSA along LRN.

14.16 Plan 2 shows that although our definition of the TCB remains unchanged from the previous boundary identified by Policy DM10 we advise that:

- there could be the potential to extend the TCB to the south to incorporate Peto Square (including the Station area and Commercial Road), subject to planning; and
- there could also be potential to extend the TCB to the north to incorporate the southern section of the High Street. As the plan shows, this extended TCB would cover the area bordered by the A12, Dukes Head Street and Rant Score. The remaining part of the High Street to the north of this area could potentially be defined as a Local Centre.

Beccles Town Centre

14.17 As described elsewhere in this report (see Section 6), Beccles Town Centre is essentially characterised by two prime shopping areas.

- The historic shopping 'heart' of the centre has traditionally been focussed around **New Market** and **Market Street**. This shopping area comprises a good mix of national multiple (e.g. WH

Smiths, Boots and Co-op) and independent businesses, supplemented by cafés, restaurants, public houses and other service businesses that help to underpin the overall attraction and vitality of these prime shopping streets. The table in **Appendix 11** shows that 69% of units to the south (nos. 1-23), 63% of units to the west (nos. 25a-39) and 60% of units to the east (nos. 2-10, including the Co-op and Shoe Zone) of New Market are defined as Class (A1) retail.

- More recently the opening of **Tesco**, along with a number of high profile multiple retailers on **Newgate** (including Laura Ashley and Fat Face) and **Smallgate** (New Look), has effectively shifted the town's retail gravity and footfall further north, away from Blyburgate and London Road. The attraction of this shopping area is further consolidated by the Beales Department Store at the northern end of Smallgate. The table shows that some 89% of units along the west of Newgate are defined as Class (A1) retail and there are no A2-A5 uses identified. The table also shows that 88% of units along the east of Smallgate (nos. 27-45) are defined as Class (A1) retail. Along the west of Smallgate (nos. 20-30), the table identifies that 100% of units are in Class (A1) retail use; although it should be noted that this is because the Beales Department Store is the only unit included within this frontage.

14.18 The impact of Tesco on the town's shopping patterns, footfall and retail 'gravity' makes the definition of a contiguous PSF problematical as the southern part of Smallgate and Market Street (from the Halifax Bank), linking New Market to New Look and Beales to the north of Smallgate, have relatively weak shop frontages and mainly function as secondary shopping areas. As Plan 3 in **Appendix 11** shows, this results in the definition of two separate PSF areas in the town centre. The challenge for the local planning authority will be to connect these two areas by attracting new active and viable (Class A) ground floor uses along Market Street and the southern part of Smallgate, possibly through smaller scale 'infill' development with active ground floor commercial uses and residential and/or office space above. The table (**Appendix 11**) shows that within the defined PSF an average of 71% of total units are in Class A1 use and 26% are comprised of a mix of A2-A5 uses.

14.19 Plan 3 also shows the extent of the defined SSFs. These include the properties at the junction of Smallgate with Market Street and Station Road, and those frontages on the eastern side of Smallgate extending to Exchange Square, Hungate and Blyburgate. As the plan shows the SSFs on Hungate mainly extend on the western side (from 2 to 14-14A) and on Blyburgate they extend as far as 38-40 (Kulture Shop) on the eastern side and 27-29 (Byburgate Antiques) on the eastern side.

14.20 Our definition of the town's PSA and TCB based on the assessment of primary and secondary frontages is also illustrated on Plans 3 and 4. It differs from the Council's previous definitions in a number of important respects:

- First, we have included the Tesco store within both the PSA and TCB to reflect its important role and function as a key anchor to the town's shopping offer and a key generator of footfall and linked trips.

- Second, we have reduced the extent of the PSA to the south; excluding parts of Hungate and Byburgate. This reflects the shift in the town's retail 'gravity' and footfall northwards towards the new Tesco store.
- Third, we have extended the TCB eastwards, to include the frontages on Newgate, the library and the Roys of Wroxham food store which make an important contribution to the town centre.

Bungay Town Centre

14.21 The definition of Bungay Town Centre's PSFs is also complicated by the fact that its retail offer is concentrated in two distinct shopping areas separated by secondary frontages:

- **Market Place** and **St Mary's Street** form the town's traditional shopping focus and these prime shopping areas are characterised by a mix of multiple (e.g. Boots), regional and independent retailers (e.g. H. Wightman & Son Ltd), supplemented by the weekly market; and
- The top end of **Earsham Street (nos. 24-42 and 37-55)** is a smaller but important shopping area characterised by a good mix of high quality independent Class A uses.

14.22 Given the relative size of Bungay and its more limited retail offer, we advise that the town's defined PSF should cover that part of Market Place and St Mary's Street, as shown on the Plan in **Appendix 11**. The PSF is defined as extending southwards as far as 40 St Mary's Street (The Original Factory Shop), at the junction with Priory Lane. As the table in **Appendix 11** shows, some 59% of units in the defined PSF (comprising part of St Mary's Street and Market Place) are in Class A1 use, with a further 31% classified as being A2-A5 use. More detailed analysis shows that 63% of units along St Mary's Street (nos. 2-40) are in Class A1 use.

14.23 Notwithstanding this, the table also confirms the relatively high proportion of Class A1 uses on Earsham Street on the north side of the street (nos. 24-42) and on the south side (nos. 37-55). We therefore advise that the Council carefully monitors this part of the town centre to ensure that the character, integrity and high quality uses in this important shopping area are maintained and enhanced.

14.24 As Plan 5 in **Appendix 11** shows we have included the following streets in our recommended definition of the town's secondary shopping frontage Earsham Street (but excluding nos. 10-22 as they are predominantly in residential use); part of Market Place and Cross Street; and the frontages extending from 42 St Mary's Street (Spice of Balti) southwards to 24A Upper Olland Street. The more detailed breakdown of the proportion of A1 uses across the defined secondary shopping frontages shows that representation is strongest along Earsham Street and Upper Olland Street. Cross Street also has a high proportion of A1 uses, although it should be noted that there are only a two units on this small street.

14.25 Plan 6 shows our recommended definition of Bungay's PSA and TCB. As the plan shows we advise that the existing TCB should be retained. However, we believe the PSA should cover a more concentrated area based on our identification of primary and secondary frontages.

Halesworth Town Centre

14.26 As Plan 7 shows, we have defined Halesworth's PSF as extending from 1 Thoroughfare (C.A. Palmer & Sons) on the eastern side and 65A Thoroughfare (Wotsits) on the western side, at the junction with Bridge Street, and extending along the pedestrianised street as far as 4-5 Thoroughfare (The Angel Hotel) and 43 Thoroughfare (Lloyds Bank).

14.27 The more detailed breakdown of the Class A uses that make up the PSF, drawing on the Council's most recent (May 2015) Retail Factsheet and audits, shows that some 67% of total units in the defined **PSF** on the pedestrianised Thoroughfare are identified as being in Class A1 (retail) use, with a further 26% defined as Class A2-A5 uses. The residual 7% are residential (Class C3), vacant and other uses.

14.28 The defined SSF comprises the remaining properties on Thoroughfare, Bridge Street, Market Place and a single unit on Chediston Street. Although the health check assessment identified Market Place and Bridge Street as shopping streets that make an important contribution to Halesworth's overall vitality and viability, they predominately have a more secondary role in terms of their retail offer. In general terms, these streets comprise a mix of Class A1 and non-A1 uses that are more typical of secondary shopping frontages. Chediston Street mainly comprises residential properties and for this reason we have only extended the SSF as far as number 154. The table in Appendix ? shows that a significantly lower proportion (37%) of units in the SSF are classified as A1 uses, with a further 39% occupied by A2-A5 uses and 8% classified as residential (Class C3).

14.29 Plan 8 shows our definition of the town's PSA and TCB based on the evidence. We do not propose any significant changes to the TCB, although we recommend that the boundary be extended southwards to include the car park and properties bordered by Saxons Way and Angel Link. In terms of the PSA, we have defined a more concentrated area focused on the pedestrianised Thoroughfare and Market Place. At this stage we have excluded the Thoroughfare car park 'site' from the PSA, although we advise that this area should be incorporated in the PSA as and when the redevelopment of this site occurs for a high quality mix used scheme.

Southwold Town Centre

14.30 Plan 9 in **Appendix 11** shows, Southwold's PSF is identified as extending from 8 East Street (The Blue Lighthouse), along the north side of Market Place and the High Street up to the junction with Victoria Street. On the south side, the PSF is identified as extending from 19 Market Place (Norwich and Peterborough Building Society) up to and including the Post Office on the High Street.

14.31 As the plan also illustrates, the SSF comprises the upper end of High Street and part of Victoria Street to the north of the town centre, and parts of Queen Street and East Street to the south. The SSF has been extended along Victoria Street to include the Adnams Wine Cellar and Kitchen Store (Use Class A1).

14.32 The more detailed breakdown of the Class A uses that make up the PSF and SSF shows that:

- An average of 68% of total units in the defined **PSF** are in Class A1 (retail) use, with an additional 12% comprising a mix of Class A2-A5 uses. Within this total combined figure, there is a higher representation of A1 uses along East Street and Market Place compared to the High Street; although the High Street is the main focus for activity and footfall in the town centre.
- An average of 47% of total units in the defined **SSF** are in Class A1 (retail) use, 10% are Class A2-A5 uses and 28% are Class C3. It is noted that the proportion of Class A1 uses does vary across each secondary shopping street, but this is explained by the fact that some of these streets only have a limited number of units upon which the proportions are based (e.g. Victoria Street).

14.33 Our analysis also confirms that Church Street, Blackmill Road, Barnaby Green Road and Pinkney's Lane only have a small number of units and are predominately occupied by non-retail uses. We therefore recommend that these streets are not included as part of any secondary shopping frontages designation.

14.34 In terms of our definition of the PSA, Plan 10 in **Appendix 11** shows that it principally covers the High Street, and parts of East Street and Queen Street. The PSA has also been extended to include the Adnams Cellar & Kitchen.

14.35 We have also identified a wider TCB than previously defined. As the plan shows the TCB has been extended along Blackmill Road to include the Picture Palace, which makes an important contribution to the town centre's overall offer and vitality. We have also extended the TCB along the southern part of Victoria Street, as far as Church Street, to incorporate the Southwold Museum and other uses in this area. Finally, we have extended the TCB down to the seafront and Promenade, running along East Street and Queen Street (up to and including the Red Lion PH) and then down Primrose Alley. The inclusion of the sea front as part of the TCB reflects its importance to the town's overall economy and attraction.

15 DEFINITION OF IMPACT THRESHOLDS

- 15.1 This section examines whether there is a policy requirement for the local planning authority to set a local (floorspace-based) impact threshold, rather than use the default of 2,500 m² gross identified by the NPPF (paragraph 26). This is important as it will determine whether applicants should carry out an impact assessment for new retail, leisure and office development outside of town centres that are not in accordance with an up-to-date Local Plan.
- 15.2 The *National Planning Practice Guidance* (NPPG) published in March 2014 provides advice in setting a locally appropriate threshold and states that it will be important to consider the:
- scale of proposals relative to town centres;
 - the existing viability and vitality of town centres;
 - cumulative effects of recent developments;
 - whether local town centres are vulnerable;
 - likely effects of development on any town centre strategy; and
 - impact on any other planned investment.
- 15.3 While the quantitative and qualitative research evidence indicates that the main towns and smaller centres in Waveney District appear to be vital and viable, they are nevertheless vulnerable to increased competition from out-of-centre retailing and the growth of internet shopping. It is apparent that the main centres in both Districts have lost market share to competing out-of-centre foodstores, retail warehouses and retail parks.
- 15.4 Our assessment of retail trends in Section 3 has highlighted the dynamic growth in smaller convenience stores operated by the major grocers (i.e. Sainsbury's Local, Tesco Express, Little Waitrose, etc.). Although sizes vary from location-to-location, the main grocers are generally seeking new convenience stores (e.g. Tesco Express, Sainsbury's Local, Little Waitrose) with a minimum gross floorspace of circa 4,000 sq ft (372m²) gross. In circumstances where these smaller stores are proposed on the edge or outside of smaller local and village centres, often as part of petrol filling stations, they could result in a significant adverse impact on their trading performance, and overall vitality and viability. This will particularly be the case where smaller centres and villages are dependent on smaller supermarkets and convenience ('top-up') stores to anchor their retail offer and generate footfall and linked trips/expenditure to the benefit of other shops, services and facilities.
- 15.5 In addition, modern retailers selling a range of comparison goods (including fashion, homestore and 'bulky' goods retailers) generally have requirements for larger format shop units with a minimum floorspace of approximately 5,000 sq ft (465m²) gross. This scale of floorspace provides operators with the necessary minimum 'critical mass' of sales needed to display their full range of goods in-

store and attract customers from a wider catchment area, particularly where they are co-located alongside similar stores in town centre and out-of-centre locations. In general terms larger format non-food stores of over 5,000 sq ft gross are also unlikely to trade as a purely local facility⁴².

- 15.6 We therefore conclude in this case that it is reasonable for applicants proposing developments for new comparison and convenience goods retailing of 350m² gross and above to demonstrate that they will not have a significant adverse impact on the District's main town centres or the network of smaller centres and villages, either on their own or cumulatively with other commitments in the area, in accordance with the NPPF.
- 15.7 In our judgement this is a reasonable impact threshold as it will provide the local planning authority with sufficient flexibility to assess the merits and implications of edge and out-of-centre foodstore applications that could potentially have significant implications for the viability and delivery of new or extended floorspace in these existing centres. We also advise that this threshold should be applied, where relevant, to change of use applications and applications seeking variations of conditions.
- 15.8 We also consider that a **350m² gross impact threshold** is reasonable in this case based on our experience of advising other local planning authorities, and also drawing on the minimum impact thresholds identified in recently adopted local plans (including, for example, Richmondshire District Council, Rother District Council, Rotherham Metropolitan Council, Stafford Borough Council, Warrington Borough Council and Norwich City Council).
- 15.9 Notwithstanding the adoption of a lower locally set impact threshold, it is important that the scope of any Retail Impact Assessment (RIA) in support of planning applications is discussed and agreed between the applicants and the Council at an early stage in the pre-application process. The level of detail included within a RIA should be proportionate to the scale and type of retail floorspace proposed, and should be agreed between the Council and applicant on a case-by-case basis. In all cases the local planning authority should adopt a pragmatic and reasonable approach with regard to the scope and detail of evidence required in support of planning applications.

⁴² According to the Sunday Trading laws a 'large shop' is defined as being over 280m² (3,014 sq ft). This area includes all parts of the shop used to display goods and serve customers, and is therefore broadly equivalent to a store's net sales area in retail planning terms. This provides a broad indication at the national level as to what constitutes a 'large shop' capable of generating a reasonable amount of trade (and, therefore, the potential to result in an impact on shopping patterns).

16 EXECUTIVE SUMMARY AND KEY FINDINGS

- 16.1 This final section summarises the key findings of the *Waveney District Retail and Leisure Needs Assessment* (WDRDNA, 2016). It sets out high level advice on how the local planning authority can effectively plan for, manage and promote the vitality and viability of their main town and local centres over the development plan period.
- 16.2 Our advice is based on the updated assessment of the quantitative and qualitative need for new retail (comparison and convenience goods) floorspace and commercial leisure uses over the development plan period, up to 2032. The need assessment draws on a robust and up-to-date evidence base and new primary research, including a health check of the District main centres; and a telephone interview survey of some 1,000 households across the Districts and a wider defined Study Area to help establish current shopping patterns, leisure preferences and market shares.
- 16.3 The study has been prepared in the context of national and development plan policy guidance, as well as other key material considerations. This includes the *National Planning Policy Framework* (NPPF) and the *National Planning Practice Guidance* (PPG), which place weight on the development of positive plan-led visions and strategies for town centres, and promote new investment and development in town centres first ahead of edge and out of centre locations.

DISTRICT-WIDE RETAIL AND LEISURE NEEDS

- 16.4 Sections 11-12 assessed the overall need for new (convenience and comparison goods) retail floorspace and leisure uses in Waveney District over the development plan period.
- 16.5 The retail capacity assessment is informed by CJ's **CREAT^e** Capacity Model. The more detailed tabulations are set out in Appendix 8 for convenience goods and Appendix 9 for comparison goods. The retail capacity assessment is underpinned by robust evidence and forecasts; it assumes that the retail market is in '*equilibrium*' at the base year (2016) and that market shares remain constant over the study period. The assessment identified the following retail capacity for Waveney District over the short (0-5 years), medium (0-10 years) and long term (0-15 years).

Table 16.1 Waveney District – Retail Capacity Forecasts

	2021	2026	2031	2032
Comparison Goods Floorspace Capacity (m ² net):	-1,379	3,994	9,879	11,063
Convenience Goods Floorspace (m ² net) ¹ :	850	1,566	2,122	2,197
TOTAL RETAIL CAPACITY	-529	5,560	12,001	13,260

Source: Table 12, Appendices 8 and 9 (Steps 5 and 6)

Notes: ⁽¹⁾ capacity is for superstore-format floorspace only trading at a higher average sales density.

- 16.6 The forecasts show no District-wide capacity for new retail floorspace over the short term to 2021 due to the impact of new commitments in the planning pipeline. Total retail floorspace capacity increases thereafter to 5,560m² net by 2026, up to 13,260m² net by 2032. Assuming a reasonable gross/net floorspace ratio of 80%, this is equivalent to a gross floorspace of 6,950m² at 2026, increasing to 16,575m² gross by 2032.
- 16.7 However, as we state in Section 11, capacity forecasts beyond five years should be treated with caution, as they are based on various layers of assumptions and forecasts with regard to the trading performance of existing centres and stores, the growth in population and retail spending, constant market shares, etc. For example, if the growth in Internet and multi-channel shopping is stronger than current forecasts suggest, then this could reduce the future demand and capacity for new 'physical' space over the long term. The Council should take into account these margins for error when assessing the need for new retail floorspace.
- 16.8 Although forecasting future leisure needs is less certain, we have identified a qualitative and quantitative need for a modern 'state-of-the-art' multi-screen cinema, preferably in or on the edge of Lowestoft Town Centre, to help claw back some of the leakage of trips to larger multiplexes in Norwich and elsewhere. We have also identified a quantitative and qualitative need for new high quality food and beverage (Class A3-A4) uses in the District and its main centres, along with the potential for new gyms and health and fitness facilities, and hotels to help underpin the daytime, evening and visitor/tourist economies.
- 16.9 Ideally any new cinema provision should form part of a commercially-led mixed use development comprising a mix of Class A and commercial uses at ground and first floor level, with the potential for new residential units and/or office space above. However, this will need to be subject to more detailed market testing of the requirements of cinema operators and other end users for representation in Waveney District. It will also depend on the identification and allocation of suitable, viable and accessible sites that have the critical mass to accommodate a comprehensive mixed use development.

MEETING NEEDS IN THE DISTRICTS' TOWN CENTRES

- 16.10 For each centre the following provides a brief summary of:
- their relative health, role and function (Sections 5-10);
 - the forecast quantitative and qualitative need for new retail floorspace and leisure uses (Sections 11-12);
 - the potential to accommodate some and/or all of the identified need over the short, medium and long term (Section 13);

- recommendations on the extent of their primary and secondary shop frontages, as well as appropriate primary shopping areas and town centre boundaries that reflect both current and future provision and needs (Section 14); and
- a reasonable and robust impact 'threshold' in accordance with the NPPF and PPG that will allow the local planning authority to assess and understand any likely impacts from new edge and out of centre applications on the vitality and viability of each main centre (Section 15).

16.11 Our review of the current performance of the Districts' main town centres has been informed by the findings of the most up-to-date evidence and research, including the health checks, centre audits and household survey. It also takes into account the current policy framework and strategic visions for each centre. Our assessment is based on our understanding of the potential availability and suitability of key sites in the main town centres based on discussions with the local planning authority. It also draws on our market knowledge of the current businesses models and requirements of retailers and commercial leisure operators, and the likely scale, format and location of space that they will be seeking over the development plan period.

Lowestoft Town Centre

16.12 Lowestoft is the largest town and principal shopping centre in Waveney District. It performs an important role serving the District's retail, leisure and service needs, as well as a wider tourist and visitor market. It is defined as a "Major Town Centre" in the adopted Core Strategy and we recommend that this classification is retained.

16.13 Overall the centre appears to be performing well against a number of the key (health check) performance indicators, but it remains vulnerable to competition from higher order centres (principally Norwich), out-of-centre shopping/leisure destinations and the growth in internet shopping.

16.14 The household survey results show that Lowestoft is achieving a relatively low market share (5.3%) for convenience goods shopping in the District, which reflects the strong provision, market share (54.2%) and impact of the six main foodstores outside the town centre. Its market share has also fallen from 7% in 2006. This points to a potential need in Lowestoft Town Centre for new convenience goods floorspace, subject to market demand and the identification of suitable and viable sites over the plan period.

16.15 Lowestoft's role as the District's principal shopping centre is reflected by its 30.5% market share of comparison goods shopping within the broad local authority area. Its market share within the District is also higher than recorded in 2006 (c.21%). Of the District's other main centres, Beccles Town Centre (including Tesco) is achieving the next highest market share of 6.5%. The impact of Norwich on comparison goods shopping in the District, and particularly fashion shopping, is confirmed by its

21.4% market share. Great Yarmouth's influence and draw is less significant; it is achieving a 1.5% market share.

16.16 The town centre health check and audits have identified that Lowestoft's shopping offer is essentially divided into three distinct shopping areas:

- **London Road North** is the prime shopping street and its offer is anchored by a good mix of national multiple and independent retail, leisure and service uses, including Beales Department Store and the Britten Shopping Centre;
- the 'traditional' **High Street** is physically separated from the pedestrianised London Road North by Artillery Way (A12) and is characterised by a mix of independent and specialist uses and the Triangle Market. However linkages to this shopping area are poor and the overall vitality and viability of the High Street, particularly to the north, has declined over the years; and
- the area south of **Station Square** is on the periphery of the centre and is characterised by limited retail provision and footfall.

16.17 The economic capacity assessment has forecast the following potential need for new retail (convenience and comparison goods) floorspace in the Town Centre up to 2032.

Table 16.2 Lowestoft Town Centre – Retail Capacity Forecasts

	2021	2026	2031	2032
Comparison Goods Floorspace Capacity (m ² net):	-1,632	2,237	6,503	7,364
Convenience Goods Floorspace (m ² net) ¹ :	489	911	1,251	1,299
TOTAL RETAIL CAPACITY	-1,143	3,148	7,754	8,663

Source: Table 13, Appendices 8 and 9 (Steps 5 and 6)

Notes: ⁽¹⁾ capacity is for superstore-format floorspace only trading at a higher average sales density.

16.18 As the table shows, there is no outstanding quantitative need for new retail floorspace over the short term, up to 2021, due to the impact of new commitments. Forecast capacity does increase thereafter to 3,148m² net by 2026 and 8,663m² net by 2032. This is equivalent to 3,935m² gross by 2026 and 10,829m² gross by 2032. Lowestoft accounts for the majority (approximately 65%) of the forecast capacity for new retail floorspace over the plan period.

16.19 We consider that London Road North and the High Street would benefit from new complementary (public and private sector) investment and development over the plan period to help maintain and enhance their distinct roles, offer and vitality. As we describe below, Station Square could provide the opportunity to accommodate a new comprehensive retail/leisure-led mixed use scheme to meet the identified needs for new floorspace and uses. To help promote, guide and deliver new investment and development over the plan period we advise that the local planning authority should take a proactive role, starting with the preparation of an overarching strategic vision and town centre

masterplan (and/or prospectus) setting out the principles for the scale, location, format and design of new development.

- 16.20 We have also identified a qualitative and quantitative need for a new modern multiplex cinema, food and beverage uses, gym/health and fitness facility and hotel(s) in Lowestoft to help maintain and strengthen its daytime, 'twilight' and evening economy. These uses should preferably be provided as part of a comprehensive retail/leisure-led mixed use development and located in the town centre, or failing that on an edge-of-centre site that is well connected to the primary shopping area, or provides the opportunity to develop strong linkages.
- 16.21 Against this background our assessment of potential development opportunity sites has identified that Peto Square still offers the best opportunity to accommodate significant new retail, leisure and mixed use development in a comprehensive scheme over the medium to long term. The delivery of a mixed use scheme in this location would form a natural southwards extension to the main shopping area, but would have to address the need for greater connectivity with London Road North and the primary shopping area. Notwithstanding this, we understand that land assembly has been complicated by the different land ownerships on the site, and therefore delivery could rest on the Council using its CPO powers.
- 16.22 Elsewhere in the town centre there could be potential for the redevelopment of some of the identified sites in and on the edge of London Road North (including some of the under-capacity car parks) for a mix of uses, as well as the Triangle Market site on the traditional High Street to the north of the A12. However, as stated above, we advise that the development potential of these sites be assessed and tested in more detail by the Council as part of a comprehensive town centre masterplan.
- 16.23 Based on our definition of shop frontages and the extent of the PSA, we advise that the definition of the Town Centre Boundary as identified by Policy DM10 remains unchanged. However, there could be the potential to extend the TCB to the south to incorporate Peto Square (including the Station area and Commercial Road), subject to planning and development. There could also be potential to extend the TCB to the north to incorporate the southern section of the High Street. As the plan in Appendix 11 shows, this extended TCB would cover the area bordered by the A12, Dukes Head Street and Rant Score. The remaining part of the High Street to the north of this area could potentially be defined as a Local Centre.

Beccles Town Centre

- 16.24 Beccles is the largest market town in Waveney district. It is defined as a 'Large Town Centre' in the adopted Core Strategy and we consider that this is still an appropriate classification.
- 16.25 The historic shopping 'heart' of the centre has traditionally been focussed around New Market and Market Street, which comprises a good mix of national multiple (e.g. WH Smiths, Boots and Co-op)

and independent businesses, supplemented by cafés, restaurants, public houses and other service businesses that help to underpin the overall attraction and vitality of these prime shopping streets. The town's vacancy levels (7.1%) are below the national average.

16.26 The opening of the Tesco superstore to the east of Newgate has clearly benefitted the town centre's overall vitality and viability. It has helped to claw back food shopping trips and expenditure to Beccles; generated linked trips and footfall to the benefit of other shops, services and businesses; and has increased the town's total market share of convenience goods shopping from 1% in 2006 to 9.4% from within the District area, which is also higher than for Lowestoft (5.3%). The Tesco development has also attracted new investment to the northern parts of Newgate and Smallgate, including the opening of high profile national retailers such as Laura Ashley and Iceland. As a result it has shifted the town's retail gravity and pedestrian circuit northwards, away from the more peripheral shopping streets to the south; principally Blyburgate.

16.27 The markets and other events in Beccles also make an important contribution to the town centre's overall vitality and viability, serving the needs of local residents as well as attracting visitors and tourists to Beccles. There would appear to be significant potential to expand and promote the markets and events to help attract visitors and tourists throughout the year.

16.28 The economic capacity assessment has forecast the following potential need for new retail (convenience and comparison goods) floorspace in the Town Centre up to 2032.

Table 16.3 Beccles Town Centre – Retail Capacity Forecasts

	2021	2026	2031	2032
Comparison Goods Floorspace Capacity (m ² net):	153	921	1,743	1,908
Convenience Goods Floorspace (m ² net) ¹ :	236	426	565	584
TOTAL RETAIL CAPACITY	389	1,347	2,308	2,492

Source: Table 14, Appendices 8 and 9 (Steps 5 and 6)

16.29 As the table shows, there is forecast capacity for 1,347m² net of new retail floorspace by 2026, increasing to 2,492m² net by 2032. This is equivalent to 1,648m² gross by 2026 and 3,115m² gross by 2032. The leisure 'gaps' analysis has also identified the potential need for more hotels in the town centre to meet visitor and tourist demand.

16.30 In terms of accommodating the forecast retail and leisure needs over the plan period the local planning authority has identified the development potential of the Fibrenyle site (Site H, **Appendix 10**), located between Gosford Road and Blyburgate, adjacent to the Roys of Wroxham store to the south. Although we consider that this site does have potential for new retail/leisure-led development, its suitability and viability may have been impacted by the opening of Tesco which has resulted in this site becoming more 'isolated' from the town's primary shopping area. As a result we advise that more detailed market testing is carried out, preferably as part of the preparation of a planning and

development brief for the site. In addition we have also identified the potential for 'infill' development across the town centre, principally along Market Street and the southern section of Smallgate, to help improve the connections and active frontages between Tesco and the town's traditional prime shopping area on New Market.

16.31 As described in Section 14 our recommended revisions to the town's shopping frontages, PSA and TCB take account of Tesco's important role and function as a key anchor to the town's shopping offer, and a key generator of footfall and linked trips.

Bungay Town Centre

16.32 Bungay is an historic market town, characterised by its historic Castle Bailey. The centre's main retail, service and leisure uses extend from St Mary's Street, through Market Place and Earsham Street, interspersed by residential and non-commercial uses which break up the active frontages. It is slightly larger than Halesworth and Southwold in terms of retail floorspace, and is classified as a 'Smaller Town Centre' in the retail hierarchy. We consider this classification is still appropriate.

16.33 The health check has identified that Bungay's retail offer is characterised by independent business, with a limited multiple offer focussed on St Mary's Street. The western part of Earsham Street has a good range and choice of high quality independent businesses in attractive historic frontages. This offer should be maintained and enhanced, alongside bringing back the former Post Office and Black Dog Restaurant into active use. The household survey results also confirm that Bungay is achieving a relatively limited market share of comparison goods (1.6%) and convenience goods (0.3%) shopping within the District area. In contrast, the out-of-centre Co-Op at Hillside Road East has a higher market share of 2.1%, but brings little benefits to the town centre in terms of linked trips and expenditure.

16.34 The one-way system along St Mary's Street appears to have had a positive impact, with pedestrians now benefitting from a safer environment. However we understand that there is a shortage of parking in the town, particularly during peak holiday periods. The loss of free parking in the town centre is also a sensitive issue for local residents and shoppers, albeit that this is not unique to Bungay.

16.35 The health checks and stakeholder consultations have also highlighted the potential to build on the success of the street markets and events, particularly focussed on the Castle Bailey, to help attract more visitors and tourists to the town centre throughout the year.

16.36 The economic capacity assessment has forecast the following potential need for new retail (convenience and comparison goods) floorspace in the Town Centre up to 2032.

Table 16.4 Bungay Town Centre – Retail Capacity Forecasts

	2021	2026	2031	2032
Comparison Goods Floorspace Capacity (m ² net):	39	229	432	473
Convenience Goods Floorspace (m ² net) ¹ :	30	54	71	73
TOTAL RETAIL CAPACITY	69	283	503	546

Source: Table 15, Appendices 8 and 9 (Steps 5 and 6)

16.37 As the table shows, there is forecast capacity for 283m² net of new retail floorspace by 2026, increasing to 546m² net by 2032. This is equivalent to 354m² gross by 2026 and 683m² gross by 2032. The leisure ‘gaps’ analysis has also identified the potential need for more hotels in the town centre to meet visitor and tourist demand, subject to market demand.

16.38 In terms of accommodating the forecast retail and leisure needs over the plan period no specific development opportunity sites have been identified by the local planning authority. This reflects the historic nature of the centre. Notwithstanding this we consider that the forecast need could be met through the change of use of existing vacant buildings (such as the Post Office for example) and through infill development where demand exists. For example there are some car parks on the edge of the centre that could provide an opportunity for redevelopment; although it is vitally important that parking provision is maintained and increased through redevelopment, not lost.

16.39 The plan in **Appendix 11** shows our recommended definition of Bungay’s frontages, PSA and TCB. As the plan shows we advise that the existing TCB should be retained. However, we believe the PSA should cover a more concentrated area based on our identification of primary and secondary frontages.

Halesworth

16.40 Halesworth is a historic market town that predominately serves its rural hinterland catchment population. It is classified at the same level in the retail hierarchy as the town centres of Bungay and Southwold as a ‘Smaller Town Centre’, and we consider this classification is still appropriate.

16.41 The town’s main retail, leisure and service offer is mainly focussed on the attractive pedestrianised Thoroughfare, and extends to Bridge Street and Market Place. It has a strong provision of independent food and convenience stores predominantly meeting the day-to-day needs of its shoppers, and the Co-Op on Saxon Way has an important role as a main food shopping destination, albeit outside the town centre. The household survey results show that the town centre is achieving a 1.2% market share for all food/convenience goods purchases within the District, whereas the Co-Op’s share is higher at 4.2%.

16.42 The town's comparison goods offer is more limited, and mainly characterised by arts, crafts and antique shops. The survey results indicate it is achieving a 3% market share of all comparison goods shopping in the District, which is higher than for Bungay (1.6%) and Southwold (0.6%).

16.43 The town's retail offer is further supplemented by the small weekly market on Market Place, and we advise that opportunities to expand the market and events should be explored, particularly during the busy holiday periods to help attract more visitors and tourists. Overall vacancy levels across the centre are low (5.4%) and parking provision is good; although the loss of free parking is a live issue for local residents and businesses.

16.44 The economic capacity assessment has forecast the following potential need for new retail (convenience and comparison goods) floorspace in the Town Centre up to 2032.

Table 16.5 Halesworth Town Centre – Retail Capacity Forecasts

	2021	2026	2031	2032
Comparison Goods Floorspace Capacity (m ² net):	38	378	750	824
Convenience Goods Floorspace (m ² net) ¹ :	51	93	123	126
TOTAL RETAIL CAPACITY	89	471	873	950

Source: Table 16, Appendices 8 and 9 (Steps 5 and 6)

16.45 As the table shows, there is forecast capacity for 471m² net of new retail floorspace by 2026, increasing to 950m² net by 2032. This is equivalent to 589m² gross by 2026 and 1,188m² gross by 2032. The leisure 'gaps' analysis has also identified the potential for more hotels in the town centre to meet visitor and tourist demand, subject to market demand.

16.46 In terms of accommodating the forecast needs, the Thoroughfare site within the town centre (Site I, Appendix 10) represents the most immediate opportunity. The site is within easy walking distance of the main shopping street and comprises a Council-owned surface car park to the north of the site, and various businesses with associated car parking on the southern part of the site. The site was the subject of a planning permission for a supermarket granted on appeal in 2002 and is also identified by the adopted Local Plan as the favoured location for new retail development. However, given that there has been a marked delay in delivering the extant planning permission for a foodstore on this site, we advise that the Council should take a more proactive role in identifying potential development opportunities and occupiers for this site in its role as a key landowner. This will involve more detailed market testing and possibly the preparation of an up-to-date planning and development brief to help attract developer and investor interest.

16.47 As the plan in Appendix 11 shows we have defined a more concentrated PSA focused on the pedestrianised Thoroughfare and Market Place. At this stage we have excluded the Thoroughfare car park 'site' from the PSA, although we advise that this area should be incorporated as and when the redevelopment of this site occurs for a high quality mix used scheme. We do not propose any

significant changes to the Town Centre Boundary, although we believe it could be extended southwards to include the car park and properties bordered by Saxons Way and Angel Link as they site may have potential for future redevelopment.

Southwold

16.48 Southwold is a Heritage Coast seaside resort located in the *Suffolk Coast and Heaths AONB*. Although the smallest of the District's market towns in terms of its total retail floorspace, the centre has developed a strong and unique shopping, leisure and service offer due to its important role as a tourist and visitor destination. Apart from the attractive seafront, the Adnams Brewery and associated uses are particular attractions.

16.49 The centre's main offer is focussed along the linear High Street and Market Place where it forks into East Street and Queen Street, joining together on Pinkey's Lane. It has relatively strong comparison goods and fashion offer, including a number of national multiple retailers that would not normally be associated with a centre of its size; this again reflects its strong visitor and tourist economy. Southwold's food and convenience offer is characterised by smaller independent stores, 'anchored' by Tesco Express and Co-Op. It has a good selection of cafés and restaurants, and the Electric Picture Palace on Blackmill Road is a unique and popular attraction, albeit separated from the High Street. Vacancy levels across the centre are also low, at 5.3%.

16.50 Overall Southwold is a popular, attractive, vital and viable town centre. The main issue appears to be a lack of parking during peak holiday periods which can lead to severe congestion around the town centre. The identification of additional car parking and/or 'park-and-ride' provision to meet peak demand is a priority for the town centre, otherwise it could discourage visits to the town centre to the detriment of the local economy.

16.51 The economic capacity assessment has forecast the following potential need for new retail (convenience and comparison goods) floorspace in the Town Centre up to 2032.

Table 16.6 Southwold Town Centre – Retail Capacity Forecasts

	2021	2026	2031	2032
Comparison Goods Floorspace Capacity (m ² net):	15	154	305	335
Convenience Goods Floorspace (m ² net) ¹ :	7	13	17	18
TOTAL RETAIL CAPACITY	22	167	322	353

Source: Table 17, Appendices 8 and 9 (Steps 5 and 6)

16.52 As the table shows, there is forecast capacity for 167m² net of new retail floorspace by 2026, increasing to 353m² net by 2032. This is equivalent to 209m² gross by 2026 and 441m² gross by 2032. Although not significant, there is limited scope for new retail floorspace development in the town centre due to its historic nature. As a resulting, meeting the identified needs will have to occur

through the conversion and change of use of existing buildings in the primary shopping area, and/or through 'infill' development as has happened in the past.

16.53 As described in Section 14, we have defined the town's Primary Shopping Area as covering the High Street, and parts of East Street and Queen Street, as well as Adnams Cellar & Kitchen on Victoria Street. The plan in Appendix 11 also shows that we have identified a wider TCB than previously defined.

District and Local Centres

16.54 Section 10 provides a brief summary of the relative attraction, offer and performance of the main District and Local centres in Waveney based on the health check evidence provided by the local planning authority and our audits of each centre. The more detailed health check proformas are set out in **Appendix 7**.

16.55 The *Waveney District Core Strategy* (2009) identifies Kirkley and Oulton Broad as District Centres. Based on our assessment of both centres we consider that this classification is still valid and robust. Both centres principally serve the retail, leisure and service needs of their local (walk-in) resident populations, as well as the wider visitor and tourist markets generated by the attraction of the seafront and The Broads.

16.56 Kirkley is the larger of the two centres, with 77 units⁴³ compared to Oulton Broad's 54 units. Both centres have a relatively good mix of independent stores and cafés for their size, but an under-provision of banks and building societies. The smaller convenience stores in both centres predominantly cater for the day-to-day needs of local residents, as well as visitors and tourists. This is reflected by the fact that Kirkley and Oulton Broad are principally identified as 'top-up' food shopping destinations by the household survey. Notwithstanding this, there would appear to be potential to increase the convenience food offer in both centres, as well as the number of cafés and restaurants to cater for the needs of their local catchment populations, and the wider visitor and tourist markets. The health checks and survey results confirm that neither centre has a major comparison goods offer, which is to be expected given their roles in the District's network and hierarchy of centres.

16.57 Vacancy levels in both centres range between 11%-13%. The vacant units are distributed across both centres and there are no major clusters within the defined centre boundaries that point to failing shopping streets and/or areas. However, we did note a number of larger vacant units at the time of our visit; including the former Winelodge in Oulton Broad, and Hovell's and the Royal Court Hotel in Kirkley. This will be a cause for concern if these larger units remain vacant for a long time as they will create 'dead' frontages in both centres.

⁴³ Class A, C1, D1 and Sui Generis uses.

- 16.58 There would appear to be potential to increase the linkages between both centres and the existing visitor/tourist attractions (i.e. the seafront and Broads) to help capture a higher proportion of visitor and tourist expenditure. This could be achieved through greater investment in the management, marketing and promotion of both centres. For example, the development of a comprehensive signage and wayfinding strategy targeted at visitors and tourists to the area would help to make them more aware of the offer in both centres and their different attractions.
- 16.59 In terms of the 15 other smaller local centres in the District, they vary in terms of the scale, mix and quality of their retail, leisure and service provision. These range from the largest local centre, London Road (Pakefield) which has 23 units, to Bittern Green which has only three units, one of which was vacant at the time of our audit. Overall we have identified that all the local centres are relatively healthy and perform an important role and function in the retail hierarchy, meeting the day-to-day convenience and service needs of their local (predominantly walk-in) catchment population. However, given the scale and offer in Bittern Green we advise that it should not be classified as a local centre.

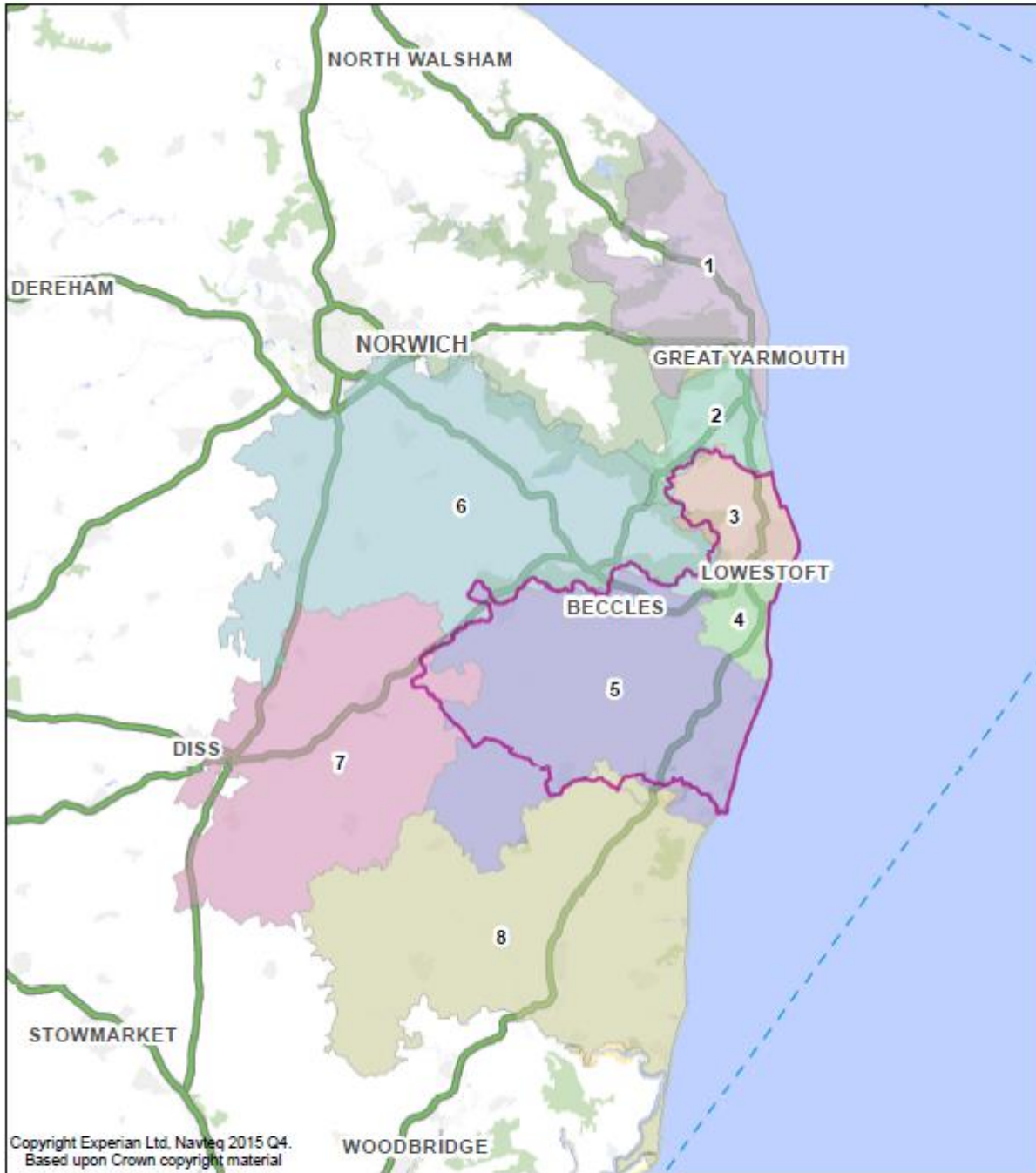
17 GLOSSARY

CITY CENTRES:	The highest level of centre identified in development plans. In terms of hierarchies, they will often be a regional centre and will serve a wide catchment. The centre may be very large, embracing a wide range of activities and may be distinguished by areas which may perform different main functions.
TOWN CENTRES:	Town centres will usually be the second level of centres after city centres and, in many cases, they will be the principal centre or centres in a local authority's area. In rural areas they are likely to be market towns and other centres of similar size and role which function as important service centres, providing a range of facilities and services for extensive rural catchment areas. In planning the future of town centres, local planning authorities should consider the function of different parts of the centre and how these contribute to its overall vitality and viability.
DISTRICT CENTRES:	District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.
LOCAL CENTRES:	Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette.
TOWN CENTRE USES:	Main town centre uses are retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, cultural and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
TOWN CENTRE BOUNDARY:	Defined area, including the primary shopping area and areas of predominantly leisure, business and other main town centre uses within or adjacent to the primary shopping area. The extent of the town centre should be defined on a proposals map.
PRIMARY SHOPPING AREA (PSA)	Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage). The extent of the primary shopping area should be defined on the proposals map. Smaller centres may not have areas of predominantly leisure, business and other main town centre uses adjacent to the primary shopping area, therefore the town centre may not extend beyond the primary shopping area.
PRIMARY & SECONDARY FRONTAGES	Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses, such as restaurants, cinemas and businesses.
EDGE-OF-CENTRE	For retail purposes, a location that is well connected up to 300 metres from the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge-of-centre, account should be taken of local circumstances.
OUT-OF-CENTRE	A location which is not in or on the edge of a centre but not necessarily outside the urban area.
OUT-OF-TOWN	A location out of centre that is outside the existing urban area.
CONVENIENCE SHOPPING	Convenience retailing is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery.
SUPERMARKETS	Self-service stores selling mainly food, with a trading floorspace less than 2,500 square metres, often with car parking.
SUPERSTORES	Self-service stores selling mainly food, or food and non-food goods, usually with more than 2,500 square metres trading floorspace, with supporting car parking.
COMPARISON SHOPPING	Comparison retailing is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.
RETAIL WAREHOUSES	Large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods, catering mainly for car-borne customers.
RETAIL PARKS	An agglomeration of at least 3 retail warehouses.
WAREHOUSE CLUBS	Large businesses specialising in volume sales of reduced priced goods. The operator may limit access to businesses, organisations or classes of individual.
FACTORY OUTLET CENTRES	Groups of shops specialising in selling seconds and end-of-line goods at discounted prices.
REGIONAL & SUB-REGIONAL SHOPPING CENTRES	Out-of-centre shopping centres which are generally over shopping centres 50,000 square metres gross retail area, typically comprising a wide variety of comparison goods stores.
LEISURE PARKS	Leisure parks often feature a mix of leisure facilities, such as a multi-screen cinema, indoor bowling centres, night club, restaurants, bars and fast-food outlets, with car parking.

CONVENIENCE GOODS EXPENDITURE	Expenditure (including VAT as applicable) on goods in COICOP categories: Food and non-alcoholic beverages, Tobacco, Alcoholic beverages (off-trade), Newspapers and periodicals, Non-durable household goods.
COMPARISON GOODS EXPENDITURE	Expenditure (including VAT as applicable) on goods in COICOP Categories: Clothing materials & garments, Shoes & other footwear, Materials for maintenance & repair of dwellings, Furniture & furnishings; carpets & other floor coverings, Household textiles, Major household appliances, whether electric or not, Small electric household appliances, Tools & miscellaneous accessories, Glassware, tableware & household utensils, Medical goods & other pharmaceutical products, Therapeutic appliances & equipment, Bicycles, Recording media, Games, toys & hobbies; sport & camping equipment; musical instruments, Gardens, plants & flowers, Pets & related products, Books & stationery, Audio-visual, photographic and information processing equipment, Appliances for personal care, Jewellery, watches & clocks, Other personal effects.
SPECIAL FORMS OF TRADING	All retail sales not in shops and stores; including sales via the internet, mail order, TV shopping, party plan, vending machines, door-to-door and temporary open market stalls.
GROSS GROUND FLOOR FOOTPRINT FLOORSPACE	The area shown on the Ordnance Survey map or other plans as being occupied by buildings and covered areas measured externally.
GROSS RETAIL FLOORSPACE	The total built floor area measured externally which is occupied exclusively by a retailer or retailers; excluding open areas used for the storage, display or sale of goods.
NET RETAIL SALES AREA	The sales area within a building (i.e. all internal areas accessible to the customer), but excluding checkouts, lobbies, concessions, restaurants, customer toilets and walkways behind the checkouts.
RETAIL SALES DENSITY	Convenience goods, comparison goods or all goods retail sales (stated as including or excluding VAT) for a specified year on the price basis indicated, divided by the net retail sales area generating those sales.
FLOORSPACE 'PRODUCTIVITY' ('EFFICIENCY') GROWTH	The percentage by which a retail sales density is assumed to increase annually in real terms over a stated period. The choice of the most appropriate level of growth will depend on individual circumstances, and in particular the capacity of existing floorspace to absorb increased sales. It is also important that selected rates of growth in productivity are compatible with assumptions about the growth in per capita expenditure.
QUANTITATIVE NEED	Is conventionally measured as expenditure capacity (i.e. the balance between the turnover capacity of existing facilities and available expenditure in any given area). Expenditure capacity, or 'quantitative need' can arise as a result of forecast expenditure growth (either through population growth or increase in spending), or by identification of an imbalance between the existing facilities and current level of expenditure available in an area.
QUALITATIVE NEED	Includes more subjective measures such as, for example, consumer choice; the appropriate distribution of facilities; and the needs of those living in deprived areas. 'Over trading' is also identified as a measure of qualitative need, although evidence of significant over-crowding, etc., may also be an indicator of quantitative need.
OVERTRADING	The extent to which the turnover of existing stores significantly exceeds benchmark turnovers may be a qualitative indicator of need, and in some cases inform quantitative need considerations. For example it may be an expression of the poor range of existing facilities or limited choice of stores and a lack of new floorspace within a locality. In certain cases 'overtrading' occurs when there is an imbalance between demand (i.e. available spend) and supply (i.e. existing floorspace capacity).
BENCHMARK TURNOVER	In the case of specific types of provision (such as foodstores) company average turnover figures are widely available and can provide an indication of a 'benchmark' turnover for existing facilities. However, turnover benchmarks should not be used prescriptively or in isolation to indicate a measure of 'need'. It is important to recognise that a range of factors (such as rental levels and other operating costs) mean that operators are likely to trade at a wide range of turnover levels. Given the inherent margins of error involved in this type of exercise, the use of company averages as benchmarks should be treated with caution unless they are corroborated by other independent evidence of under-performance, or strong trading. Examples might include the results of in-centre health checks, or the extent of congestion in stores and queuing at checkouts.

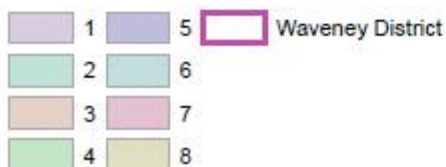
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APPENDIX 1: STUDY AREA



Waveney Retail and Leisure Needs Study

Study Zones



Carter Jonas

APPENDIX 2: HOUSEHOLD SURVEY METHODOLOGY

APPENDIX 3: HOUSEHOLD SURVEY RESULTS (WEIGHTED)

APPENDIX 4: CONVENIENCE GOODS - MARKET SHARES (incl SFT)

APPENDIX 5: COMPARISON GOODS - MARKET SHARES (incl SFT)

APPENDIX 6: HEALTH CHECK PRO FORMAS – MAIN TOWN CENTRES

APPENDIX 7: HEALTH CHECK PRO FORMAS – DISTRICT & LOCAL CENTRES

APPENDIX 8: CONVENIENCE GOODS CAPACITY ASSESSMENT

APPENDIX 9: COMPARISON GOODS CAPACITY ASSESSMENT

APPENDIX 10: DEVELOPMENT OPPORTUNITY SITES – PLANS

APPENDIX 11: FRONTAGES AND BOUNDARIES – TABLES & PLANS