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Calderdale Borough Council Retail Study 2016

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1.0 Introduction

- 1.1 Calderdale Borough Council (CBC) has commissioned Nathaniel Lichfield & Partners (NLP) to prepare a Retail Capacity Study, including assessments of town centre composition and health.
- 1.2 The key objective of the study is to provide a robust and credible evidence base to inform the Calderdale development plan, taking into account changes since the previous 2009 Retail Study. This new study provides:
 - 1 a qualitative analysis of the existing retail and leisure facilities within the town and district centres of Calderdale Borough, including identification of the role of each centre, catchment areas and the relationship between the centres; and
 - 2 a quantitative and qualitative assessment of the need for new retail floorspace within Calderdale Borough. This assessment examines the need for both convenience and comparison retailing including a qualitative analysis for different forms of facilities such as retail warehousing, local shops, large food stores and traditional high street comparison shopping.
- 1.3 The study includes an assessment of:
 - 1 changes in shopping patterns since the previous study was undertaken and the reasons behind this, including the effects of economic downturn and recession in 2008/2009. This study uses the most up-to-date expenditure data, the 2011 Census and latest mid-year population estimates;
 - 2 the future need and (residual) capacity for retail floorspace distributed by the main centres for the period up to 2031;
 - 3 the potential implications of development and proposals coming forward both within and outside the Borough, in terms of impact on town centres and potential changes to shopping patterns;
 - 4 the existing retail hierarchy and network of centres advising on whether any changes is classification are justified; and
 - 5 development plan policies and allocations including providing recommendations on how each centre can develop its role.

Report Structure

- 1.4 The Report is structured as follows:
 - Section 2 of this report describes the shopping hierarchy;
 - Section 3 outlines retail trends and provides a retail capacity and need assessment;
 - Section 4 assesses the scope for commercial leisure uses;

- Section 5 explores opportunities for accommodating growth and an overview of town centre frontage policies; and
- Section 6 sets out recommendations and conclusions.

2.0 The Shopping Hierarchy

Introduction

- 2.1 The National Planning Policy Framework (NPPF) indicates (paragraph 23) that planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. Local Plans are expected to define a network and hierarchy of centres that is resilient to anticipated future economic changes.
- 2.2 The Planning Practice Guidance (PPG) places emphasis on developing strategies for town centres that are appropriate and realistic to the role of centres in the hierarchy. Town centre strategies should be based on the current state of a centre and opportunities to meet development needs (in full). These town centre strategies should seek to support the town centre vitality and viability, and should assess if changes to the role and hierarchy of centres are appropriate.
- 2.3 This section provides an overview of the shopping hierarchy in Calderdale Borough and the surrounding sub-region.

Centres in Calderdale Borough and the Surrounding Area

- 2.4 Calderdale Borough is part of West Yorkshire to its western side, and is bounded by a number of administrative areas, comprising: Bradford; Burnley; Kirklees; Oldham; Pendle; Rochdale; and Rossendale. The largest centre in the Borough is Halifax town centre, which is supported by the smaller town centres of Brighouse, Elland, Hebden Bridge, Sowerby Bridge and Todmorden and a number of smaller district centres catering for local needs shopping and services. Crossley Retail Park, Greenmount Retail Park and Halifax Retail Park are in the same location to the west of Halifax town centre. They contain retailers such as Aldi, Argos, Carpet Right, Dulux Decorator Centre, Dunelm, Halfords, Home Bargains, Iceland, Pets at Home, Poundstretcher, Sports Direct and TK Maxx.
- 2.5 The Replacement Calderdale UDP (as amended in 2009) sets out policies on retail and town centres. *Policy GS 1: Retail Strategy* refers to a modern, competitive, environmentally attractive and sustainable retailing sector including the upgrading, modernisation and enhancement of retailing provision within town centres and locations highlighted within the retail hierarchy will be sought to meet the needs of Calderdale's residents. As part of this strategy, the vitality and viability of existing centres will be maintained to ensure that they remain attractive to shoppers and visitors and can compete effectively with other centres and other forms of retailing.
- 2.6 Venuescore ranks over 2,500 of the UK's leading retail destinations including town centres, malls, retail warehouse parks and factory outlet centres. Halifax,

Brighouse, Sowerby Bridge and Greenmount Retail Park are listed within the Venuescore data. The other smaller centres in the Borough have few multiple retailers and are not included within Venuescore analysis.

Table 2.1 sets out Venuescore data for Calderdale centres and other centres outside of the Borough that are within the sub-regional retail hierarchy or have an influence on it.

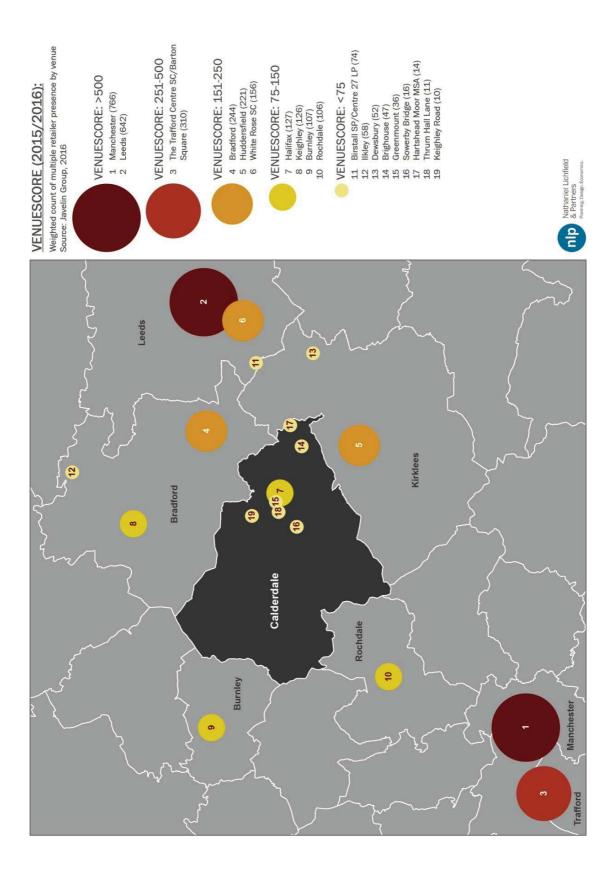
Centre	UK Rank	Venuescore
Manchester	2	766
Leeds	4	642
The Trafford Centre	32	310
Bradford	55	244
Huddersfield	70	221
White Rose Shopping Centre, Leeds	150	156
Halifax	196	127
Keighley	200	126
Burnley	242	107
Rochdale	245	106
Birstall Shopping Park, Batley	384	74
llkley	516	58
Dewsbury	590	52
Brighouse	659	47
Greenmount	882	36
Sowerby Bridge	1,908	16
Hartshead Moor	2,193	14
Thrum Hall Lane	2,827	11
Keighley Road	3,152	10

Table 2.1 Venuescore UK Shopping Index

Source: Venuescore, Javelin Group 2015/16

- 2.8 Each destination is given a weighted score for the number of multiple retailers present, and the score attached to each retailer is weighted depending on their overall impact on shopping patterns. Halifax is within the Sub-Regional tier, with Brighouse and Greenmount Retail Park being classified as District centres by Venuescore and Sowerby Bridge and the other smaller centres being within the Local tier. The Venuescore terminology does not translate directly into NPPF classifications and should be treated with some caution. The locations of these centres listed in Table 2.1 are illustrated by Figure 2.1.
- 2.9 Figure 2.1 indicates that residents in Calderdale Borough have good access to Bradford, Leeds, Manchester and The Trafford Centre, in addition to those destinations in the Borough that meet both comparison and every-day shopping needs. There is limited outflow of convenience retail expenditure from the Borough, which is a typical finding across most administrative areas. The Borough also has a relatively healthy retention rate in the comparison retail sector.

Figure 2.1: Venuescore Shopping Hierarchy



Defined Retail Centres

- 2.10 The current Development Plan for Calderdale is the Replacement Calderdale UDP (adopted 2006) as amended (2009). The Council was in the process of producing a Core Strategy which got to the Preferred Options stage in 2012, before being superseded by preparation of a Local Plan. This study is part of the evidence base for the Local Plan.
- 2.11 The Replacement Calderdale UDP and the Core Strategy Preferred Options Stage both set retail hierarchies. The broadly consistent hierarchies are set out in Table 2.2.

 Table 2.2
 The Defined Retail Centres in the Borough in the Current Development Plan and Abandoned Emerging Development Plan

<u>Current Development Plan</u> Replacement Calderdale UDP (adopted 2006) as amended (2009)	Emerging Development Plan (Now Abandoned) Core Strategy Preferred Options Stage (2012) (not adopted)
Type of Centre	Type of Centre
Major Town Centre	Strategic Town Centre
Halifax	Halifax
Town Centres	Town Centres
Brighouse	Brighouse
Elland	Elland
Hebden Bridge	Hebden Bridge
Sowerby Bridge	Sowerby Bridge
Todmorden	Todmorden
Local Centres	District Centres
Hipperholme	Hipperholme
King Cross	King Cross
Mytholmroyd	Mytholmroyd
Northowram	Northowram
Queens Road	Queens Road
Ripponden	Ripponden
West Vale	West Vale
-	Bailiff Bridge

Source: Replacement Calderdale UDP (adopted 2006) as amended (2009) and Core Strategy Preferred Options Stage (2012) (not adopted)

The key differences are as follows:

- The Replacement Calderdale UDP defines Halifax as a Major Town Centre, whereas, the Core Strategy Preferred Options proposed that Halifax be defined as a Strategic Town Centre;
- After defined town centres, the next tier of centres in the retail hierarchy of the Replacement Calderdale UDP is a series of Local Centres. However, the Core Strategy Preferred Options sought to upgrade these centres to the status of district centre; and

2.12

• The Replacement Calderdale UDP identifies Bailiff Bridge as 'Local Shops', whereas the Core Strategy Preferred Options proposed that Bailiff Bridge be defined as a District Centre.

Existing Retail Provision in Calderdale Borough

2.14 Detailed consideration of existing retail and service provision in the main centres is provided by the town centre health check assessments and audits included at **Appendix 1**. A summary of units and convenience and comparison floorspace is set out in Table 2.3 below.

Centre	Class A Shop Units	Convenience Goods Floorspace (sq. m gross)	Comparison Goods Floorspace (sq. m gross)			
Strategic Town Centre						
Halifax	752	11,823	46,418			
	Town C	Centres				
Hebden Bridge	199	1,956	5,235			
Brighouse	195	10,272	10,499			
Todmorden	171	2,533	3,514			
Sowerby Bridge	148	1,821	3,749			
Elland	127	2,292	4,171			
Sub-Total	840	18,875	27,167			
	District	Centres				
King Cross	80	6,238	2,256			
Queens Road	64	1,051	1,738			
West Vale	47	669	407			
Mytholmroyd	36	450	1,357			
Ripponden	34	833	445			
Hipperholme	33	892	685			
Northowram	13	51	1,029			
Bailiff Bridge	12	225	161			
Sub-Total	319	10,409	8,078			
Total	1,911	41,108	81,663			

Table 2.3 Existing Retail Shop Provision

Source: Calderdale Council Survey Data 2016

- 2.15 Town centres comprise the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. The town centre health check assessments and audits at **Appendix 1** confirm Halifax as the main shopping destination within the Borough, both in terms of total number of units and the quantum of convenience and comparison floorspace.
- 2.16 Of the other defined centres, Brighouse is the largest town centre having regard to the quantum of floorspace, which is significantly greater than the

^{2.13} Set out below is an analysis of existing retail provision and an analysis of suggested classification.

other defined town centres. Looking at number of units though, Brighouse, Hebden Bridge and Todmorden all have between 170 and 200 units.

- 2.17 District centres typically comprises 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. There is a clear distinction between the size of the district centres and town centres. King Cross is the largest currently defined district centre with 80 units and has 47 fewer units than Elland which is the smallest town centre. Queens Road and West Vale are the next largest district centres respectively, based on the number of units. Bailiff Bridge (12 units) and Northowram (13 units) are clearly the smallest district centres.
- 2.18 The majority of the currently defined district centres function in accordance with the expectation for centres of that scale within a typical retail hierarchy. These centres are appropriately classified as district centres.
- 2.19 Whilst Bailiff Bridge is the smallest defined district centre, it is similar in size to Northowram especially in terms of the number of units and to an extent the amount of floorspace. Whilst this study has not provided an assessment of the smaller local and neighbourhood centres within the Borough, it is our understanding that there are some existing local centres that have more units than Bailiff Bridge and Northowram, such as Ovenden Cross and Skircoat Green. Bailiff Bridge and Northowram function as local centres and on this basis, it is appropriate to include them as local centres in the local retail hierarchy.
- 2.20 National and local policy indicates that it is important for town centres generally to maintain and strengthen their role in the retail hierarchy. Smaller centres should continue to perform a more local function meeting day to day shopping and service needs.
- 2.21 The retail hierarchy as proposed in the now not-to-be-progressed Core Strategy Preferred Options is considered to be appropriate (excluding Bailiff Bridge and Northowram) and the defined centres in Calderdale are described in this manner throughout the remainder of this report.

3.0 Assessment of Retail Need

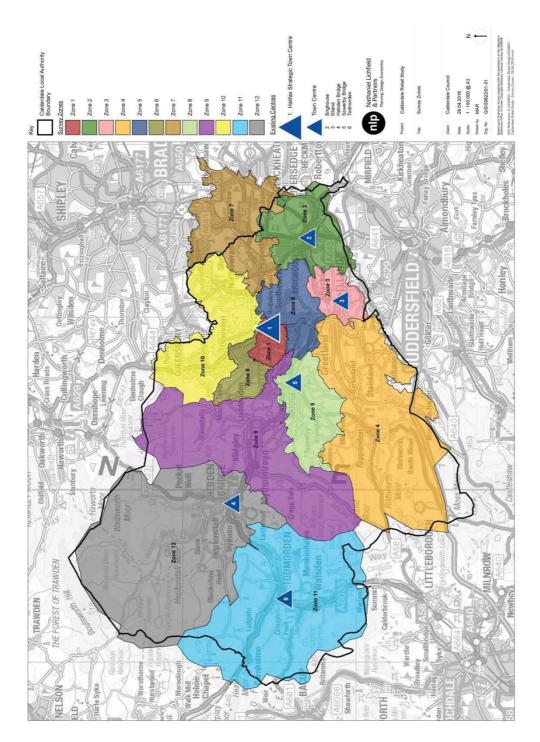
Introduction

- 3.1 The National Planning Policy Framework (NPPF) indicates (paragraph 14) that a local planning authority should positively seek opportunities to meet the development needs of its area and that its Local Plan should meet objectively assessed needs.
- 3.2 The Planning Practice Guidance (PPG) indicates that development plans should develop (and keep under review) town centre strategies that plan for a 3-5 year period, whilst also giving a Local Plan lifetime view. Plans should identify the scale of need for main town centre uses.
- 3.3 The PPG also introduces the requirement to consider a range of plausible scenarios, including a 'no development' scenario, which should not assume that all centres are likely to benefit from expenditure growth.
- 3.4 This section objectively assesses the quantitative and qualitative scope for new retail floorspace in Calderdale Borough in the period from 2016 to 2031. It sets out the methodology adopted for this analysis and provides a quantitative capacity analysis in terms of levels of spending for convenience and comparison goods shopping. A qualitative assessment of the range and scale of existing shopping facilities has been undertaken as part of the town centre health check assessments and audits in **Appendix 1**.

Study Area

- The quantitative analysis is based on a defined Study Area that covers the catchment areas of the main shopping destinations in the Borough. The Study Area covers Calderdale Borough and a small area to the north east of the Borough towards Bradford. The Study Area adopted is the same as that in the previous 2009 study. This Study Area is considered appropriate and allows for a direct comparison of the findings of this study and the previous 2009 study.
- 3.6 The Study Area is sub-divided into twelve sub-zones as shown in **Appendix 2** and Figure 3.1 overleaf. The survey zones are based on postcode sectors and take into consideration the extent of the primary catchment areas of the six main settlements of Halifax, Brighouse, Elland, Hebden Bridge, Sowerby Bridge and Todmorden.
- 3.7 The primary catchment areas are the areas where each centre will attract a significant proportion of its retail trade. There will be retail expenditure leakage from the study area to destinations beyond it and potentially expenditure inflow from surrounding areas.
- The methodology is summarised in Figure 3.2 overleaf and set out in more detail in **Appendix 3**.





¹ Certain very limited areas of the Borough do not form part of the Study Area, such as Ainley Top to the south of zone 3 and Outlane to the south east of zone 4. This is because the sub-zones which make up the Study Area are based on postcode sectors, which do not correspond exactly with administrative boundaries. Including a greater number of post-code sectors to encompass these areas would have led to the Study Area expanding into town centres within other administrative areas, which is not considered appropriate. The exclusion of these areas is not material.

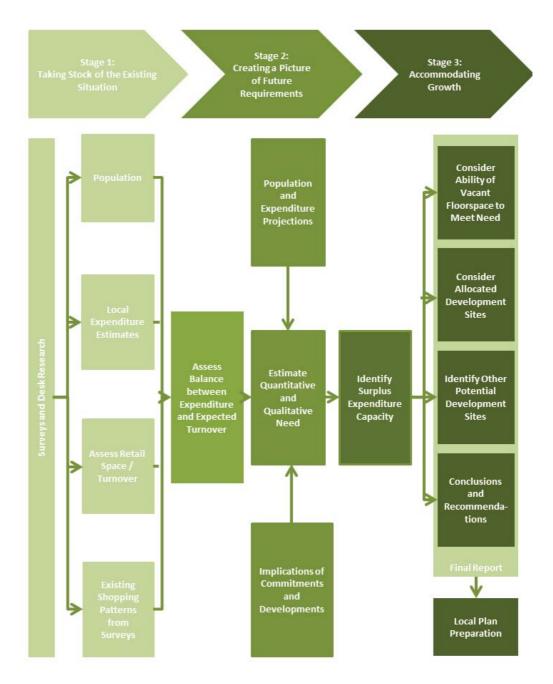


Figure 3.2: Methodology for Estimating Future Requirements for Retail Floorspace

Calderdale Borough Retail Trends

Assessment in Context with National Trends

- 3.9 This section considers the changes in the retail sector nationally and the potential implications for Calderdale Borough.
- 3.10 The town and district centres have a strong independent retail offer, but this does not make the Borough immune to the national retail trends. This is particularly so given a trend towards a reduced number of high-street brands under the control of increasingly dominant multiples. Understanding national retail trends is important to understanding the likely future health of centres in Calderdale Borough, as is recognising the strength of independents and the more recent resurgence in this sector helped by relaxed controls on change of use and the ability to switch between uses on a temporary basis.
- 3.11 The economic downturn of the past decade resulted in a number of high-profile high street casualties, with across the board impact on retail centres. The picture is not entirely gloomy though as new retailers have entered the marketplace and some existing retailers have expanded portfolios. Across smaller centres local businesses and independents have experienced resurgence; often filling voids left by departed national multiples.
- 3.12 Food store operators are in a period of consolidation and demand from traditional retail warehouse operators is also reduced. Developers and investors have abandoned many town centre schemes. However, to a certain extent, Halifax offers the type of retail floorspace required to be a strong draw amongst national multiples, i.e. larger retail units that are of a uniform shape.

Expenditure Growth

- 3.13 Assessing future expenditure levels requires the Study to take into account the effects of the economic downturn and the slow rate of recovery, particularly in the short term. Careful consideration is needed to establish the appropriate level of expenditure growth to be adopted over the Local Plan period. This study takes a long term view for the plan period recognising the cyclical nature of expenditure growth. Trends in population growth, home shopping/internet sales and growth in turnover efficiency also need to be carefully considered and a balanced approach taken.
- 3.14 Historic retail trends indicate that expenditure grows consistently in real terms, generally following a cyclical growth trend. Whilst the rate of change varies by area, Calderdale Borough mirrors the underlying trend which shows consistent growth that is expected to continue in the future.
- 3.15 The recent economic downturn led to negative growth at its deepest point followed by a trend of limited growth in the short-term. However, following the UK's European Union (EU) referendum on 23 June 2016 and the vote to leave the EU, there is likely to be a period of economic uncertainty, particularly in the short term, regardless of the ultimate detail of the UK exit.

- 3.16 In the past, sustained significant expenditure growth fuelled similarly sustained and rapid growth in retail floorspace, including major development on the edge and outside of traditional town centres. Local examples of this are Asda at Thrum Hall Lane, Halifax, Morrisons at Jubilee Way, Elland and Tesco at Sowerby Street, Sowerby Bridge. It is unlikely that such sustained significant expenditure growth will be witnessed in the short-medium term.
- 3.17 Experian data indicates that retail expenditure reduced by 3.9% during 2009 to 2011, with the food/grocery and bulky comparison goods sectors hardest hit. These expenditure trends explain why the high street performed better than out-of-centre retail parks during the recession. During this period the proportion of expenditure attributed to non-store trading (including home shopping) increased from 8.2% to 10.8%.
- 3.18 The economic downturn slowed growth considerably and a return to previous levels of growth is unlikely to be achieved, at least in the short to medium term. However, the underlying trend over the medium to long term is expected to lead to a need for additional convenience and comparison goods retail floorspace. A shift to local/independent business is playing an increasingly important role in driving this. NLP anticipates that national trends will continue to be mirrored in Calderdale Borough and population and retail expenditure is expected to continue growing year-on-year. The uncertainty regarding the UK's future economic standing following the decision to leave the EU brings the likely magnitude of expenditure growth into question.

New Forms of Retailing

- New forms of retailing have emerged in recent years as an alternative to more 3.19 traditional high-street shopping. Home/electronic shopping has expanded considerably with increasing growth in the use of personal computers/tablets/mobile phones and the internet. Smart phone technology, Apps, QR (Quick Response) codes, internet-connected glasses, multichannelling and other technological advances are set to increase the proportion of shopping transactions undertaken remotely, subject to areas being equipped to support the digital retail economy. The fact that rural areas are typically behind the curve of a growth in the digital retail economy (due to the logistical difficulties of providing fast internet services and demographics) means that there is likely to be a lag in any impact on Calderdale Borough. Once the infrastructure is in place and on-line shopping captures a greater share of the local market, it is likely that this will introduce new challenges to retailers (and particularly the independent sector in Calderdale) and a renewed necessity to monitor and manage town centre health.
- 3.20 On-line shopping has the potential to be a significant threat to retail centres in Calderdale Borough as it removes the previous barrier to competition of having to travel to physical stores in higher order centres to reach alternative outlets. That said, there are also potential positive benefits of new forms of retailing in Calderdale Borough. Many retailers are relocating from higher rental value premises in higher order centres across the regional/sub-regional hierarchy to

lower rental value premises (often in lower order centres) as the need to have a high street presence is for some inversely proportional to the proportion of sales completed on-line. Such trends are likely to see retailers occupying units in business/enterprise park locations but also in smaller/lower order centres where there is both a captive local market and the digital infrastructure necessary for a base serving an on-line business. This could open up the potential for the likes of the town centres (excluding Halifax) and the district centres to attract businesses that would previously not have considered locating in a centre of that size.

- 3.21 The household survey results suggest that 4.3% of households in the Calderdale Study Area did their last main food/grocery shopping via the internet/ (collection point/home delivery), and also 4.3% of households do most of their comparison shopping, via the internet, TV or catalogue.
- 3.22 The latest available data suggests on-line shopping remains a limited proportion of total retail expenditure but is growing; the proportion of convenience retail shopping on-line is still limited albeit e-shopping has gained a considerable stronghold in the comparison retail sector. Recent trends suggest continued strong growth in this sector, albeit there is still uncertainty about its longer-term prospects and the potential effects on the high street. Experian Retail Planner Briefing Note 13 (October 2015) states:

'There were 57.3 million internet users in the UK (representing 88.4% of the population) in mid-year 2014 according to Internet World Stats. So growth of the internet user base will be less of a driver than in the past decade. But growth momentum will be sustained as new technology such as browsing and purchasing through mobile phones and the development of interactive TV shopping boost internet retailing'.

- 3.23 This study makes an allowance for future growth in e-tailing based on Experian projections. Given that internet shopping is likely to continue increasing in proportional terms, despite uncertainties over the nature and magnitude of growth, this assessment adopts relatively cautious growth projections for retail expenditure in terms of its generation of need for the provision of new physical retail floorspace.
- 3.24 The implications of these trends on the demand for retail space are unclear. For example, some retailers operate on-line sales from their traditional retail premises e.g. foodstore operators, therefore growth in on-line sales may not always mean there is a reduction in the need for retail floorspace. Given the likelihood that non-store activity will continue to increase in proportional terms, this assessment has adopted relatively cautious growth projections for retail expenditure (as set out in the retail capacity methodology, **Appendix 3**).

Retail Operators' Changing Formats

3.25 Operators have responded to changing customer requirements with extended opening hours and Sunday trading adding to the vitality of centres, but perhaps

less so in more local needs centres² where more traditional opening hours have typically remained. Government proposals to hand Sunday trading laws to local Councils are side-lined at least for time being, but could provide the opportunity for less restriction on trading practices amongst larger stores. Stores in the primary frontage in Halifax would meet the criteria for extended hours if the Council chose to exercise any future powers afforded in this regard.

- 3.26 Major foodstore operators have over the past 15 years introduced smaller store formats capable of being accommodated within town centres, and linked to petrol filling stations such as Tesco Express and Sainsbury's Local. However, recent research by the Local Data Company (Retail Week, 17-06-16) indicates that convenience store numbers have reached saturation, having increased by 21% between 2010 and 2015. Major foodstore operators are now in a period of consolidation, which includes the refurbishment of existing stores.
- 3.27 The expansion of discount foodstore operators continues and at rapid pace, building upon sustained growth in the last decade, albeit the recent experimental reintroduction of the Netto facia has ended with the pilot stores closing. Within Calderdale Borough are two Aldi stores (Elland and Halifax) and four Lidl stores (Halifax x2, Sowerby Bridge and Todmorden). Furthermore, there are commitments and undetermined planning applications for foodstores where Aldi or Lidl is the named operator. There are also Farmfoods, Heron Frozen Foods and Iceland stores located in Halifax. Calderdale is well-served by deep discount foodstores. As of 19 June 2016, Aldi and Lidl had increased market share by 11.5% and 13.8% respectively, over the period since 27 March 2016. This had taken their combined market share of the UK to a new high of 10.5% based on this twelve week period.
- 3.28 The bulky goods retail warehouse sector has rationalised and operators have scaled down store sizes, amidst a climate of mergers and failures. Other traditional high street retailers, including Boots and TK Maxx, have sought large out-of-centre stores. The charity shop sector has grown steadily over the past 20 years and there is no sign that this trend will halt. The discount comparison retail sector has also grown significantly in recent years with major expansion from the likes of B&M Bargains, Home Bargains, Poundland, Poundstretcher and Quality Save, first in-centre and now increasingly on retail parks. The following discount comparison stores are located in Calderdale Borough: B&M Bargains (Halifax x 2, Elland and Sowerby Bridge), Home Bargains (Halifax), Poundland (Halifax x2) and Poundstretcher (Halifax and Elland). The desire amongst these retailers for larger format stores is an important consideration in planning for future comparison retail floorspace in the Borough.
- 3.29 The economic downturn has had, and is likely to continue to have, an impact on the retail sector; a sector that has in the past failed to protect itself properly against shifting economic conditions. Within town centres, many high street

² Local needs centres are those meeting day-to-day shopping needs and not bulk food or high-ticketvalue comparison retail purchases

multiple comparison retailers have changed their format. High street national multiples have increasingly sought larger modern shop units (over 200 sq. m) with an increasing polarisation of activity into the larger regional and sub-regional centres. Larger modern shop units are limited to Halifax in the main and are less common in other centres across the Borough, which is a deterrent or barrier for interested operators.

- 3.30 There is an underlying trend towards fewer but larger retail stores. Valuation Office data indicates the amount of retail floorspace in England and Wales has grown by over 3% during the economic downturn (2008 to 2012), despite a period of poor expenditure growth and an increase in on-line shopping.
- 3.31 Foodstore operators have returned to town centres and in many centres the growth in the charity and discount sectors has led to a re-occupation of vacant floorspace. Short term, the pop-up shop and permissive temporary change of use has the potential to reduce vacancy rates and increase footfall and can be a particularly effective way of encouraging occupation in smaller scale centres. Longer term, retail to residential permitted development rights and a single town centre use class are initiatives which could bring about further change in the character of the centres in Calderdale Borough.
- 3.32 The economic downturn had a significant impact on the high street. A key effect of the economic downturn on high streets was the increase in vacant shop units. Despite the more recent trend towards reoccupation of vacant units, the average unit vacancy rate has increased from below 9% before the recession began in 2008 to the current figure of just over 11% (Experian Goad).
- The current vacancy rate across Calderdale Borough in terms of the proportion of vacant units (15.5%) is above the national average (11.2%), as is the proportion of vacant floorspace (12.8% compared to a national average of 9.0%).
- The vacancy rate in terms of the proportion of vacant units in 2009 was 15.4% compared to a national average of 10.6%. The vacancy rate in terms of the proportion of vacant floorspace in 2009 was 11.5% compared to a national average of 8.9% (excluding Bailiff Bridge and Northowram which were not assessed as part of the 2009 study).
- 3.35 Parts of Calderdale Borough appear to have been affected by the recession in terms of shop vacancies between 2009 and 2016. Whilst the proportion of vacant units has remained almost unchanged, the proportion of vacant floorspace has increased by 1.3 percentage points, which is a greater increase than is the case nationally.
- 3.36 More specifically, Brighouse, Todmorden, Hipperholme and Queens Road have withstood the effects of the recession well, with the proportion of vacant units and floorspace decreasing between 2009 and 2016. However, Halifax, Hebden Bridge, Sowerby Bridge and King Cross have all seen an increase in the proportion of vacant units and floorspace.

High Street Retail Trends

- 3.37 The number of shop units within town centres has declined consistently since the early 1970s. The Centre for Retail Research's "Retail In 2018" (CRR) figures show a decline from over 300,000 units in 2001 to 282,000 in 2012. The CRR "Retail In 2018" report predicts that nearly 62,000 high street stores across Great Britain (22% in total) are likely to close between 2012 and 2018.
- 3.38 Online/multi-channel shopping and increasing retail operating costs are cited as the main culprits. That said, similar predictions of the high street's decline were made during previous recessions in the early 1980s and 1990s, which subsequently proved to be exaggerated. The high street is remarkably resilient. On this basis, it is important to examine these predictions within the context of longer terms structural trends.
- 3.39 These trends hide underlying structural changes in the retail sector. These changes are not new and have been affecting the high street for many years. In response to these trends, town centres have changed and diversified. The food and beverage, leisure and non-retail service sectors have been successful in occupying space no longer suitable for shopping. There have been cyclical trends in vacancy rates reflecting the macro economic trends, but in most cases town centres recovered during periods of stronger growth. The High Street is more resilient than many commentators give it credit.
- 3.40 Shopping behaviour will continue to change and the high street will need to continue to respond. All town centres will need to focus on the advantages they have over other forms of multi-channel shopping, for example using the internet as an extended shop window, click and collect facilities and providing a combined retail and leisure experience.
- 3.41 Experian's most recent forecasts suggest comparison goods expenditure per person will increase on average by 3.1% per annum, in real terms over and above inflation between 2016 and 2031. Taking into account ONS population projections, comparison goods expenditure in England will double over the next 20 years.
- 3.42 Not all projected expenditure growth will be available to support new retail floorspace. Non-store expenditure (special forms of trading) is expected to grow at a faster rate than expenditure and in proportional terms will absorb more growth. Continuing trends towards more modern and higher density stores and the replacement of inefficient space will result in growth in turnover efficiency – Experian suggests a growth rate of 2.0% per annum for comparison floorspace.
- Allowing for growth in multi-channel shopping and increased turnover efficiency, there could still be approximately £33 billion of growth available for new retail development in England over the next 10 years and £72 billion over the next 20 years.
- The challenge for town centres generally, and centres within Calderdale Borough specifically, will be to capitalise on this growth by securing much

needed investment. There will be continued scope for centres to diversify, for example through tapping into the evening economy, increasing the leisure and entertainment offer and focussing more on convenience and service uses, albeit comparison retail floorspace will continue to be the backbone and the and the driver of growth in many centres.

3.45 The delivery of town centre redevelopment opportunities will be the priority. There will be a requirement to build more retail floorspace in the comparison goods sector if Calderdale Borough is to maintain its market share of expenditure, not only to boost its retail offer and compete effectively with other centres, but also to secure investment in the centre.

Population and Expenditure

- 3.46 The Borough's projected population for the period 2016 to 2031 is set out in Table 1 in **Appendix 4**. Population data has been obtained from Experian for each zone based on the 2011 census. The 2011 base year population has been projected to 2031 based on the ONS 2014-based subnational population projections.
- Table 2a in Appendix 4 sets out the forecast growth in spending per head for convenience goods within each zone in the study area up to 2031. Forecasts of comparison goods spending per capita are shown in Table 2b in Appendix 4.
- As a consequence of growth in population and very limited year-on-year growth in spending per person, convenience goods spending within the study area is forecast to increase by 6% from £453.7 million in 2016 to £481.3 million in 2031, as shown in Table 3a (**Appendix 4**).
- Comparison goods spending is forecast to increase by two-thirds between 2016 and 2031, due to a higher estimate of year-on-year growth, increasing from £628.0 million in 2016 to £1,041.5 million in 2031, as shown in Table 3b (**Appendix 4**).
- 3.50 Comparison goods spending is forecast to increase more and at a faster rate than convenience spending as the amount spent on food and drink does not increase proportionately with disposable income, whereas spending on comparison goods is more closely linked to income.
- 3.51 These figures relate to real growth and exclude inflation.

Commitments

3.52 The assessment of retail need in this section of the study does not take account of existing commitments. Commitments that come forward will reduce the overall capacity for new floorspace. There is a number of retail commitments in the Borough:

- 12/00698/FUL: Committed convenience store in Brighouse as part of a mixed-use development containing other retail and/or leisure uses (Coop is the named operator):
- 12/01003/FUL: Committed foodstore in Hebden Bridge as part of a mixed-use development containing a hotel (no named operator);
- 15/01029/FUL: Committed foodstore and retail/business/storage and distribution in Todmorden (Lidl is the named operator of the foodstore unit); and
- 15/01647/FUL: Committed foodstore in Todmorden (Aldi is the named operator).
- The retail commitments are for the following floorspace in Brighouse, Hebden 3.53 Bridge and Todmorden:
 - Brighouse: 254 sq. m net convenience floorspace and 81 sq. m net comparison floorspace;
 - Hebden Bridge: 990 sq. m net convenience floorspace and 110 sq. m net comparison floorspace; and
 - Todmorden: 1,504 sq. m net convenience floorspace and 1,119 sq. m net comparison floorspace (this assumes that the existing Lidl foodstore on Halifax Road in Todmorden closes and the new Lidl foodstore and retail unit at land on Hope Street in Todmorden occur simultaneously).

The schedule does not include a commitment for an additional foodstore in Todmorden (ref. 13/01598/FUL and the named operator is Asda). This is because this commitment precedes the more recent commitment for an Aldi foodstore in Todmorden and both commitments are on the same site. We have taken the logical view that the Aldi foodstore is more likely to be implemented as this commitment is more recent and due to current market conditions whereby deep discount foodstore operators are currently most active out of all the foodstore operators.

Constant Market Share Approach

- 3.54 A constant market share approach is adopted. This means that from 2016 onwards, future capacity is calculated on the basis that the shopping patterns and market shares recorded by the 2016 household survey and presented in this study will remain unchanged over the forecasting period.
- On occasion it is necessary to make adjustments to existing shopping patterns 3.55 to take account of recently developed retail floorspace that is yet to achieve a settled pattern of trading (either within a study area or in respect of destinations outside of a study area that do or are likely to have an influence on shopping patterns within a study area); i.e. the market share of a destinations and/or centre might be expected to change once a settled pattern of trading is achieved. Incremental and piecemeal changes in retailer representation happen continually and most will not have a material impact on shopping patterns.

3.56 Whilst for major new floorspace/representation it is reasonable to assume that it will take two years for a settled pattern of trading to be established and an adjustment to existing shopping patterns might be required if a study is undertaken within that first two years of trading, such an adjustment is only required in limited circumstances. No such circumstances exist in respect of modelling capacity for Calderdale Borough (no major new retail developments have opened in the last two years) and it is reasonable for this study to proceed unfettered on a constant market share approach.

Expenditure Leakage

3.57 Leakage of expenditure from a locality, and the potential for new floorspace to enact a claw-back of this, can be indicative of additional capacity. This has potential relevance to Calderdale Borough in the comparison retail sector; retention of convenience retail goods expenditure is almost greater than 90% in three-quarters of the zones and retention levels are unlikely to be elevated further within these zones. We are of the opinion that it is not for a boroughwide retail study to give consideration to claw-back and the implications of this on capacity. A retail assessment submitted with any planning application proposing new retail floorspace outside of the Borough's town centres would be expected to consider the potential for a claw back of expenditure and the implications this has on trade diversion and the likely impact of a proposed development.

Floorspace Efficiencies

- An allowance is made for the turnover of existing comparison retail floorspace increasing its performance by 2.0% per annum, as a result of the more efficient use of floorspace. This is an NLP assumption based on Figure 4b of the Experian Retail Planner Briefing Note 13 (October 2015). 2.0% is a more modest rate of floorspace efficiency than was adopted commonly prior to the beginning of the economic downturn in 2008 and the reserved approach is a reflection of continued economic uncertainty in the retail sector.
- The adoption of an annual increase in comparison retail floorspace performance of 2.0% is however higher than those rates adopted in the 2009 Retail Study undertaken at the height of economic recession. In the 2009 study it was assumed that there would be an annual efficiency increase of 1.5% throughout the study period.
- 3.60 Floorspace efficiencies change over time. For comparison goods floorspace, a growth rate of up to 3% per annum has been widely adopted by retail planners dependent upon economic conditions. Trends indicate that comparison retailers will achieve some growth in trading efficiency. This is a function of spending growing at faster rates than new floorspace provision and retailers' ability to absorb real increases in their costs by increasing their turnover to floorspace ratio. Allowing for this growth to be absorbed by existing retailers represents a cautious approach to forecasting future needs, and this allowance may help existing centres maintain their vitality and viability in the future. It

effectively allows for existing retail outlets to increase their turnover to help them to compete with new provision.

- The most recent information provided by Experian (Figure 4b, Retail Planner Briefing Note 13, October 2015) suggests comparison sales densities will increase by 16.2% between 2014 and 2018, and then 1.9% per annum between 2018 and 2022, 2.0% per annum thereafter. NLP therefore adopts an average growth rate of 2% per annum. The continued uncertainty over future improvements in trading performance is also the reasoning behind the adoption in the convenience retail capacity assessment of zero growth in floorspace efficiencies over the period to 2031.
- 3.62 New forms of retailing have emerged in recent years as an alternative to more traditional high-street shopping. Home/electronic shopping has expanded considerably and therefore the proportion of shopping transactions undertaken remotely has increased.
- 3.63 The implications on the demand for retail space are unclear. Some retailers and particularly foodstores operate online sales from their traditional retail premises. Growth in online sales may not always mean that there is a reduction in the need for retail floorspace.
- 3.64 Given that internet shopping is likely to continue increasing in proportional terms, despite uncertainties over the nature and magnitude of growth, this assessment adopts relatively cautious growth projections for retail expenditure.

Existing Spending Patterns 2016

3.65 The results of the household shopper questionnaire survey undertaken by NEMS in July 2016 inform an analysis of shopping patterns within the study area. The results are shown in **Appendix 4**.

Convenience Shopping

The findings of the household shopper survey for main and top-up food shopping are combined to give an overall picture of food shopping patterns. The estimates of market share or penetration within each study area zone are shown in Table 4, at **Appendix 4**. The market shares in Table 4 combine the findings for both main and top up shopping based on a 70:30 split between main and top up shopping. A summary of main food shopping trips only to individual stores is shown in Table 3.1.

Destination			%	<mark>∕₀ Ma</mark>	rket	Shar	e in	each	zon	e		
	1	2	3	4	5	6	7	8	9	10	11	12
In Centre Destinations												
Halifax Town Centre	28.3	1.6	6.8	14.4	33.1	27.0	5.0	11.6	18.2	29.2	1.0	8.
Brighouse Town Centre	0.0	61.5	6.7	3.8	2.3	0.8	23.6	0.4	0.0	0.4	0.0	0.
Elland Town Centre	2.3	11.6	36.3	13.6	6.5	0.5	0.5	1.0	0.0	0.8	0.0	0.
Hebden Bridge Town Centre	0.3	0.0	0.0	0.5	0.4	0.0	0.0	0.4	9.2	0.0	0.7	46
Sowerby Bridge Town Centre	1.2	0.0	0.3	4.3	1.3	1.4	0.3	21.3	8.3	0.0	0.3	1.
Todmorden Town Centre	0.0	0.0	0.0	0.8	0.0	0.0	0.3	0.0	0.2	0.0	12.6	2.
District Centres	2.5	0.9	0.3	7.8	1.5	1.5	2.8	2.3	4.2	0.8	0.0	0.
Out of Centre Destinations												
Asda, Thrum Hall Lane, Halifax	19.4	0.0	1.1	4.0	8.2	29.9	1.1	10.1	13.0	5.6	0.6	5.
Lidl, Halifax Road, Todmorden	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	3.4	1.8	28.6	9.
Morrisons, Jubilee Way, Elland	1.4	3.6	35.2	14.7	4.2	0.0	0.5	1.5	0.5	1.0	0.0	0.
Morrisons, Keighley Road, Halifax	2.2	0.0	0.8	0.3	0.5	12.9	0.5	0.3	1.4	24.5	0.0	0.
Morrisons, Rochdale Road, Todmorden	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.4	0.3	35.5	11
Tesco, Haugh Shaw Road, Halifax	23.3	0.0	1.6	5.4	17.2	7.8	0.6	5.9	20.3	6.9	1.4	6.
Tesco, Sowerby Street, Sowerby Bridge	0.0	0.5	0.0	13.2	0.0	0.6	0.0	38.0	7.7	0.0	0.0	1.
Source: NEMS Household Survey July 20	16											
retention of main food and grocery Borough, with a very high level of convenience retail goods expendit 90%), albeit to a lesser extent, wit nearby facilities in Huddersfield, B The proportion of expenditure dire	rete ture h res turnle	ntion in Zo sider ey ar	with ones nts in nd Bi	in ei 2, 10 thes radfc	ght o 0 ano se zo ord.	of the d 11 ones	e 12 is al havi	zone so h ng a	es. T igh (a cces	he 80- ss to		
Borough, with a very high level of convenience retail goods expendit 90%), albeit to a lesser extent, wit	reter ture h res cted roug of re one is e foc	ntion in Zc sider ey ar I to n h fro side s als od sto	with ones nts in nd Bi nain m Zc nts o o in o ores/	in ei 2, 1(thes radfc food one 7 f this close conv	ght o 2 and se zo ord. and 7 res s zor e pro	of the d 11 ones groo ident ne ar	e 12 is al havi cery ts is e loc ty to	zone so h ng a shop unsu ateo Brac	es. T igh (a cces oping urpris I outs	he 80- ss to singly side City	у ,	
Borough, with a very high level of convenience retail goods expendit 90%), albeit to a lesser extent, wit nearby facilities in Huddersfield, B The proportion of expenditure dire destinations within Calderdale Bor low at 42%, as a large proportion of Calderdale Borough and this zo Centre. Residents of this zone use	reter ture h res cted roug of re one is e foc aton	ntion in Zc sider ey ar I to n h fro side s als od sto and	with ones nts in nain m Zc nts o o in o ores/ Wyk	in ei 2, 10 thes adfo food one 7 f this close conv e.	ght o D and se zo ord. and 7 res s zor e pro venie	of the d 11 ones groc ident ne ar eximit ence	e 12 is al havi s is e loc y to retai	zone so h ing a shop unsu atec Brac I des	es. T igh (i cces pping urpris l outs ford stinat	he 80- ss to singly side City tions	у ,	
Borough, with a very high level of convenience retail goods expendit 90%), albeit to a lesser extent, wit nearby facilities in Huddersfield, B The proportion of expenditure dire destinations within Calderdale Bor low at 42%, as a large proportion of Calderdale Borough and this zo Centre. Residents of this zone use within Bradford, Burnley, Cleckhea The level of convenience goods es Calderdale Borough in 2016 is est	reter ture b res curne coug of re one is e foc aton xper timat	ntion in Zo sider ey ar l to n h fro side s als od sto and ted to ver o kets whic	f ide and b main main main main main main main main	in ei 2, 10 thes radfo food one 7 f this close conv e. £383 ntifie conv very	ght of 0 and se zo ord. and 7 res 3 zor 9 pro 9 enie ed to 3.0 n ed ex enie simi	of the d 11 ones groc ident he ar oximit ence o sho hillior	e 12 is al havi cery ts is e loc y to retai ps/s n as g con store o tha	zone so h ing a shop unsu atec Brac I des tores show nven es wi t ger	es. T igh (i cces oping urpris l outs ford stinat s in vn in ienco thin nerat	he 80- ss to singly side City tions	y	

Table 3.1	Main Food and Grocery Last	Trip (main destinations	mentioned by respondents)
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Comparison Shopping

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A summary of comparison goods shopping patterns in shown in Table 3.2.

 Table 3.2
 Comparison Shopping (main destination used by respondents)

Destination	% Market Share in each zone											
	1	2	3	4	5	6	7	8	9	10	11	12
Halifax	59.1	15.9	33.6	47.7	62.7	62.1	8.4	57.0	48.0	57.9	11.8	37.2
Brighouse	0.3	19.6	1.9	1.0	1.1	0.0	4.1	0.4	0.2	0.7	0.0	0.2
Elland	0.6	0.8	15.2	3.6	0.7	0.2	0.8	0.2	0.3	0.1	0.0	0.0
Hebden Bridge	0.0	0.2	0.0	0.3	0.3	0.0	0.0	0.0	5.1	0.1	1.4	26.5
Sowerby Bridge	0.4	0.0	0.0	3.0	0.2	0.5	0.2	6.8	2.2	0.2	0.3	0.0
Todmorden	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.8	0.0	18.5	2.8
Birstall Shopping Park, Birstall	2.2	5.8	4.3	3.5	1.7	2.3	12.1	1.9	1.1	2.4	0.9	1.5
Burnley	0.0	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.2	0.1	26.7	2.6
Bradford	4.2	1.0	0.3	0.0	1.2	0.8	23.8	1.6	0.3	4.3	0.8	1.0
Huddersfield	5.0	20.3	22.1	8.3	6.7	2.6	2.0	6.6	4.1	2.9	0.4	1.9
Leeds	3.2	7.3	3.0	6.0	6.1	10.7	10.0	4.8	5.8	4.2	2.6	4.9
Manchester	0.9	0.7	0.1	2.9	1.2	1.0	1.4	1.0	3.6	0.4	9.2	4.8
White Rose Shopping Centre, Leeds	2.5	4.3	3.5	1.7	1.6	1.8	8.9	1.7	2.6	5.6	0.0	0.2

Source: NEMS Household Survey July 2016

- Table 11 (Appendix 4) indicates the proportion of comparison goods expenditure generated within each zone and spent within Calderdale Borough ranges from 17% in Zone 8 (Sowerby Bridge) up to 78% in Zone 2 (Brighouse). Unsurprisingly, the proportion of comparison retail expenditure directed to destinations within Calderdale is lower than is the for case for the convenience retail sector across each of the 12 zones. The exception is Zone 7 (Hipperholme) where the proportion of comparison retail expenditure directed to destinations in Calderdale is greater than in the convenience retail sector. This general trend reflects the propensity of customers to do food and grocery shopping locally whilst for comparison shopping, customers are more likely to shop around and/or travel longer distances to visit larger centres that have more choice, across a broad range of higher-order centres including Burnley, Huddersfield and Leeds.
- 3.74 The ability to increase comparison goods market share is constrained by larger centres in the sub-region. Expenditure outflow is also affected by out-commuting from the Borough. It is unlikely that the comparison retail market share of Calderdale Borough will increase materially but equally investment and improvement in the retail offer is a prerequisite to maintaining the attractiveness of the Borough centres in light of continued investment in centres that attract comparisons retail shoppers from Calderdale.
- 3.75The estimated comparison goods expenditure currently attracted by shopping
facilities within Calderdale Borough is £410.0 million at 2016, as shown in
Table 12, **Appendix 4**.

3.76 The retail capacity assessment assumes that the current turnover of comparison retail floorspace in each of the Borough centres is representative of a benchmark trading position. The capacity assessment assumes floorspace is trading at equilibrium in 2016, which is a robust assumption given the range of fascia and independent retails and wide trading characteristics.

Quantifying Capacity

- 3.77 Set out below is a summary of the convenience and comparison retail capacity assessments included at **Appendix 4**. The capacity assessments are by strategic town (Halifax) and town (Brighouse, Elland, Hebden Bridge, Sowerby Bridge and Todmorden) centres. Capacity for local needs provision (pro-rata to the market share of the network of district centres in the Borough) is given as a single quantum, on the expectation that planning for growth in existing (or for new) district centres is best achieved through a qualitative analysis of current provision and its geographical spread. The capacity assessment gives consideration to the overall Borough-wide potential for new local needs provision.
- 3.78 Capacity for each centre (and the district centres collectively) is calculated by dividing the growth in expenditure attributable to that centre, assuming a constant market share, by a typical sales density. The full schedule of capacity calculations is at Table 10 (convenience) and Table 17 (comparison) of **Appendix 4**.

The sales densities adopted reflect the varying scales and format of retailing that is likely to be attracted to each centre. In the convenience retail sector:

- £11,000 per sq. m is adopted for Halifax town centre which approximates to the average convenience retail sales density of the four principal food retailers collectively found within Halifax town centre (Heron Frozen Foods, Marks & Spencer, Sainsbury's and Tesco);
- £9,000 per sq. m is adopted for the remaining town centres (the average of Aldi, Co-op, Lidl, One Stop, Sainsbury's and Tesco company average sales densities and adjusted based on NLP judgement); and
- £8,000 per sq. m is adopted for the district centres, which is an estimate based upon NLP judgement of average performance across convenience goods facilities within the district centres perform and is also broadly consistent with the average sales densities for Co-op, Lidl and One Stop.
- 3.80 In the comparison retail sector, £7,000 per sq. m is adopted for Halifax and £5,000 per sq. m is adopted for the remaining town centres, with £3,000 per sq. m being adopted for the district centres. This is based on the actual performance of these centres which we have calculated using the household survey derived turnover, divided by the comparison goods floorspace within each centre and then adjusted based on our judgment and knowledge of how comparison goods destinations typically perform³.

3.79

³ Please refer to NLP's Retail Capacity Assessment – Methodology and Data in **Appendix 3**.

- 3.81 Capacity is presented as a net sales area, as it is this figure that is relevant to retail impact assessments required by the NPPF. The gross floorspace of retail developments will always be greater than the net trading area, but the ratio between net and gross floorspace varies greatly. The net sales area in a corner shop might be up to 90% of the gross, whereas the equivalent figure for a large format foodstore might be as little as 60%. For these reasons, it is robust for a retail assessment to present floorspace capacity as a net figure.
- 3.82 There are references in the following section to convenience retail floorspace trading at above or below expected levels. The convenience retail assessment which follows compares the survey derived turnover of convenience retail destinations with expected (benchmark) turnover levels. The expected turnover of a convenience retail destination is the turnover that it would achieve were it to trade at company average (for named food stores) or typical (for other floorspace) sales densities. Comparing survey derived turnover with benchmark turnover for convenience retail floorspace gives an indication as to whether destinations are trading above or below what might be expected. Floorspace data to inform this benchmark assessment is derived from a number of sources including previous retail studies, Oxford Retail Consultants (ORC) Store Point, Experian GOAD and planning application data.
- 3.83 In the comparison retail sector, it is assumed that the 2016 survey-derived performance of floorspace in the Borough is its benchmark position. The comparison retail capacity assessment at Table 17 of **Appendix 4** adopts an approach whereby existing floorspace within the Borough will increase its benchmark turnover in real terms from 2016 to 2031 at a growth rate of 2.0% per annum. Trends indicate that comparison retailers historically will achieve some growth in trading efficiency. This is a function of spending growing at faster rates than new floorspace provision and the ability of retailers to absorb real increases in their costs by increasing their turnover to floorspace ratio.

Borough Quantitative Capacity

Convenience Retail Goods

- 3.84 Cumulative growth in the convenience retail goods spending power of the adopted study area (which largely equates to the Borough) is £8.9 million to 2021, £19.2 million to 2026 and £27.6 million to 2031 (Table 3a at Appendix 4).
- 3.85 The NLP capacity assessment follows an accepted methodology of applying available retail expenditure pro-rata to the market shares of destinations. It is also appropriate to take into account the performance of existing retail floorspace, compared with expected levels of performance. In circumstances where existing town centre floorspace is assessed to be underperforming, it is appropriate for organic growth in spending to be first absorbed by this underperforming floorspace. Conversely, where existing floorspace is assessed to be performing above expected levels, this can add to the identified capacity for new retail floorspace.

- 3.86 It should be noted that there is a distinct difference between overtrading and performing above expected levels. A store may trade above expected levels without this being a disincentive to existing customers. Overtrading, on the other hand, is where a store becomes so busy (evidenced by overcrowding and congestion at checkouts and in the car park and so on), that its' performance is affected as customers decide to shop elsewhere. As such, where a store is both performing above expected levels and there is also evidence of overtrading, this would be indicative of a need for additional floorspace.
- 3.87 Capacity pro-rata to the market share of out-of-centre floorspace is associated with defined centres, having regard to NLP judgement and in accordance with the NPPF principle of town-centre-first retail development.

Comparison Retail Goods

- 3.88 Growth in comparison retail goods spending power of the adopted study area is £97.0 million to 2021, £239.9 million to 2026 and £413.5 million to 2031 (Table 3b at **Appendix 4**).
- The approach that NLP adopts in the calculation of comparison retail capacity is consistent with the approach adopted in the convenience retail sector, with the exception of the assumption that comparison retail floorspace at 2016 is trading at a level that is consistent with what might be expected. It is not feasible to robustly 'benchmark' the expected turnover of comparison retail floorspace in town centres. There is limited available information regarding the average sales density of comparison goods retailers, and adopting an appropriate benchmark is difficult given the number of different trading fascias and particularly when there is a high proportion of independent retailers. It is year-on-year growth in comparison retail spending that accounts for capacity over the period to 2031.
- 3.90 A constant market share approach is adopted. From 2016 onwards, future capacity is calculated on the basis of the market shares recorded by the 2016 household survey being sustained throughout the plan period.

Halifax town centre

3.91 Table 3.3 sets out the current convenience retail capacity in Halifax and the capacity for additional convenience and comparison retail floorspace over the periods to 2021, 2026 and 2031.

Table 3.3 Quantitative capacity for additional convenience and comparison retail floorspace – Halifax

Year	Conve	nience*	Compa	rison**
	£(m)^	sq. m (net)^	£(m)^	sq. m (net)^
At 2016	-	-	-	-
By 2021	-	-	17.2	2,229
By 2026	-	-	55.8	6,535
By 2031	-	-	106.9	11,351

*Convenience sales density of £11,000 per sq. m (based upon Aldi, Heron Frozen Foods, Marks & Spencer, Sainsbury's and Tesco). No growth in floorspace efficiency over the period to 2031.

**Comparison sales density of £7,000 per sq. m at 2016 increased by floorspace efficiencies to 2031 of 2.0% per annum.

^2021, 2026 and 2031 comparison retail capacity assumes Calderdale Borough retains a constant market share.

Convenience Retail Goods

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Table 3.3 above indicates that there is no capacity for convenience floorspace in the long term.

Table 3.4 Survey derived turnover of main foodstores compared with expected trading levels

Store	Benchmark Turnover (£m)	Survey Derived Turnover (£m)	Difference (£m)
Town Centre			
Heron Frozen Foods, Market Street	3.3	0.6	-2.7
M&S Foodhall, Woolshops	5.3	7.5	2.2
Sainsbury's, Wade Street	34.2	29.3	-4.9
Tesco Metro, Market Street	9.6	9.5	-0.1
Out-of-Centre Stores			
Aldi, Crossley Retail Park	7.4	13.4	6.0

Source: NEMS Household Survey July 2016/Various sources for benchmark turnover

- 3.93 Table 3.4 indicates that the M&S Foodhall store at the Woolshops Shopping Centre is trading at above expected levels.
- 3.94 The out-of-centre Aldi store at Crossley Retail Park is also trading well-above expected levels, which is line with national trends of an increased market shares amongst the deep discounters. As the Aldi is close to Halifax town centre, we have factored-in the performance of this store when assessing the convenience goods capacity of Halifax town centre.
- The Heron Frozen Foods store on Market Street is trading below expected levels, as is the Sainsbury's store on Wade Street (14% below company benchmark levels). Since the recent global financial crisis, the 'big 4' supermarkets in the UK have tended to struggle, whereas retailers who operate at either end of the market, be it deep discounters or premium convenience foodstore operators have increased their market share. The

performance of the Sainsbury's store is illustrative of a trend which continues to push down the market share and the sales densities of the foodstore retailers with the greatest market share.

- 3.96 The Tesco Metro store on Market Street is trading at expected levels.
- 3.97 The assessment of performance against expected trading levels is across the entire convenience or comparison retail sector within any given town. Therefore if a store is trading at below benchmark turnover, this reduces the scope for additional floorspace as it is assumed that floorspace trading at below expected levels can absorb growth ahead of any need to plan for new floorspace. This impact on capacity for additional floorspace is reversed in circumstances where a store is trading at above benchmark levels.
- 3.98 On a qualitative need basis, Halifax is well-served by deep discounters, 'big 4' foodstore operators and premium operators that are a range of sizes.

Comparison Retail Goods

- 3.99 Table 12 at **Appendix 4** summarises the current comparison retail performance of destinations in Calderdale Borough. As it is assumed that destinations in Calderdale are trading at expected levels at 2016, it is a combination of population growth and year-on-year growth per person in comparison retail spending that accounts for capacity over the period to 2031.
- 3.100 Capacity for 2,229 sq. m net of additional comparison retail goods floorspace in Halifax is identified by 2021, increasing to 6,535 sq. m net by 2026 and 11,351 sq. m net by 2031. The additional capacity identified in the long term to 2031 is significant and would support considerable additional comparison retail floorspace within the principal Borough centre , with the potential of bolstering its position as a sub-regional town centre and/or uplift in floorspace as part of any redevelopment of the existing town centre floorspace.
- 3.101 High street retailers are seeking increasingly larger units and NLP advises that the Council support the principle of any town centre schemes that offer the potential for development of a small number of larger units which are suited to accommodating the requirements of key national multiples and ensure that Halifax town centre continues to be competitive in the sub-region and against out-of-centre floorspace. Redevelopment and reconfiguration of the existing shopping centres provides an opportunity to deliver larger units to meet retailer demands. Whilst this is likely to be a longer-term plan and it is only in the latter part of development plan (post 2026) that capacity for additional comparison retail floorspace, redevelopment of existing floorspace could meet the retailer demand for larger floorplates without resulting in any significant increase in overall net floorspace.

Brighouse town centre

3.102

Table 3.5 sets out the current convenience retail capacity in Brighouse and the capacity for additional convenience and comparison retail floorspace over the periods to 2021, 2026 and 2031.

Table 3 5	Quantitative capacity for additional convenience and comparison retail floorspace - Brighouse
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Year	Conve	nience*	Compa	rison**
	£(m)^	sq. m (net)^	£(m)^	sq. m (net)^
At 2016	4.4	492	-	-
By 2021	5.5	613	0.5	95
By 2026	6.8	753	1.7	280
By 2031	7.8	868	3.3	486

*Convenience sales density of £9,000 per sq. m (based upon Aldi, Co-op, Lidl, One Stop, Sainsbury's and Tesco). No growth in floorspace efficiency over the period to 2031. **Comparison sales density of £5,000 per sq. m at 2016 increased by floorspace efficiencies to 2031 of 2.0% per annum.

^2021, 2026 and 2031 comparison retail capacity assumes Calderdale Borough retains a constant market share.

Convenience Retail Goods

3.103	Table 3.5 above indicates that there is some capacity for additional
	convenience retail floorspace in Brighouse immediately (492 sq. m net), which
	increases further in the medium term (753 sq. m net) and the long term (868
	sq. m net). This long term capacity for convenience goods floorspace is
	sufficient to support a medium-sized foodstore.

- 3.104 However, there is one retail commitment in Brighouse, as follows:
 - 12/00698/FUL proposal for one A1 unit (Co-op is the named operator) and two units with a potential mix of A1/A2/A3 and/or D1 uses at land at the junction of Birkby Lane and Bradford Road.
- 3.105 This commitment could deliver approximately 254 sq. m net of new convenience retail floorspace. If it comes forward, it will take up around a third of the capacity for additional convenience floorspace in Brighouse in the long term (up to 2031).

Store	Benchmark Turnover (£m)	Survey Derived Turnover (£m)	Difference (£m)
Tesco, Huddersfield Road	25.2	29.0	3.9
Sainsbury's, Mill Lane	13.8	14.6	0.8

Table 3.6 Survey derived turnover of main foodstores compared with expected trading levels

Source: NEMS Household Survey July 2016/Various sources for benchmark turnover

3.106 As set out in Table 3.6, part of the reason for the capacity for convenience goods floorspace is because both the Tesco store on Huddersfield Road and the Sainsbury's store on Mill Lane are trading at above expected levels (by £3.9 million and £0.8 million respectively). 3.107 On a qualitative basis, Brighouse is well-catered for. If the convenience foodstore commitment mentioned above is delivered and taken up by the named operator, the Co-op, then this will provide residents of Brighouse with further increased choice.

Comparison Retail Goods

- 3.108 Capacity for additional comparison retail floorspace in Brighouse in the short term to 2021 is only some 95 sq. m net. Over the long term, this capacity increases to a more meaningful 486 sq. m net by 2031. If the retail commitment mentioned above is delivered, the likely comparison retail element of the will theoretically account for some 17% of long term capacity for additional comparison goods floorspace. On a qualitative basis, there is considerable doubt whether the comparison retail offer of smaller food stores will materially enhance the non-food offer of the town and there is good reason to support other proposals that come forward to provide additional comparison retail floorspace in the town centre.
- 3.109 Brighouse is currently deficient in the comparison retail sector, with the proportion of comparison retail floorspace (29.9%) 6.1 percentage points below the UK average (35.9%). Other than a limited number of comparison retail units towards the periphery of the town centre, along Briggate and King Street, there is a lack of comparison retail stores and unit sizes are below that demanded by the leading high street operators. Comparison retail fascia presently include variety stores (Poundworld and Wilko), pharmacies (Boots and Superdrug) and high street clothing retailers M & Co complemented by a number of independent operators.

Elland town centre

3.110 Table 3.7 below sets out the current convenience retail capacity in Elland and the capacity for additional convenience and comparison retail floorspace over the periods to 2021, 2026 and 2031.

Table 3.7	Quantitative capacity for additional convenience and comparison retail floorspace – Elland
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Year	Convenience*		Comparison**	
	£(m)^	sq. m (net)^	£(m)^	sq. m (net)^
At 2016	3.5	386	-	-
By 2021	4.3	473	0.7	122
By 2026	5.2	574	2.2	357
By 2031	5.9	657	4.2	620

*Convenience sales density of £9,000 per sq. m (based upon Aldi, Co-op, Lidl, One Stop, Sainsbury's and Tesco). No growth in floorspace efficiency over the period to 2031. **Comparison sales density of £5,000 per sq. m at 2016 increased by floorspace efficiencies to 2031 of 2.0% per annum.

^2021, 2026 and 2031 comparison retail capacity assumes Calderdale Borough retains a constant market share.

Convenience Retail Goods

3.111 Table 3.7 indicates that there is immediate capacity for limited additional convenience retail floorspace in Elland (386 sq. m net). Capacity for convenience goods floorspace rises to 657 sq. m net in the long term, up to 2031. This convenience goods capacity over the long term is sufficient to support two small format convenience retail stores.

Table 3.8 Survey derived turnover of main foodstores compared with expected trading levels

Store	Benchmark Turnover (£m)	Survey Derived Turnover (£m)	Difference (£m)
Aldi, South Lane	8.6	19.6	11.0
One Stop, Southgate	1.4	0.1	-1.3

Source: NEMS Household Survey June 2016/Various sources for benchmark turnover

- 3.112 The Aldi store on South Lane is trading significantly in excess of expected levels (£19.6 million survey derived turnover) against its company average level of £8.6 million), by 128%. However, whilst the store is undoubtedly performing very well, trading this much above company average as the household survey suggests is unlikely.
- 3.113 The One Stop shop on Southgate is under-trading by £1.3 million. However, household surveys tend to underestimate the turnover of smaller destinations, meaning that the household survey may have underestimated the turnover of this convenience store.

Comparison Retail Goods

- There is limited capacity over the period to 2021 for additional comparison floorspace. Capacity is projected to increase to 357 sq. m net by 2026 and increases further by 2031 (620 sq. m net). Capacity in the longer term is generated by factoring-in growth pro-rata to the performance of town centre comparison retail floorspace.
- 3.115 The capacity in the long-term would allow for a modest increase in comparison retail goods floorspace in Elland town centre. The capacity is enough to

accommodate one medium sized comparison goods unit or two to three smaller sized units.

3.116 Aside from the B&M store on Huddersfield Road and the Poundstretcher store on South Lane, there is a lack representation by national comparison goods multiple retailers. Increasing the number of national multiples would help to improve Elland's comparison goods offer.

Hebden Bridge town centre

- 3.117 Table 3.9 below sets out the current convenience retail capacity in Hebden Bridge and the capacity for additional convenience and comparison retail floorspace over the periods to 2021, 2026 and 2031.
 - Table 3.9
 Quantitative capacity for additional convenience and comparison retail floorspace Hebden Bridge

Year	Convenience*		Compa	rison**
	£(m)^	sq. m (net)^	£(m)^	sq. m (net)^
At 2016	-	-	-	-
By 2021	-	-	0.3	58
By 2026	0.0	3	1.0	171
By 2031	0.3	28	2.0	298

*Convenience sales density of £9,000 per sq. m (based upon Aldi, Co-op, Lidl, One Stop, Sainsbury's and Tesco). No growth in floorspace efficiency over the period to 2031. **Comparison sales density of £5,000 per sq. m at 2016 increased by floorspace efficiencies to 2031 of 2.0% per annum.

^2021, 2026 and 2031 comparison retail capacity assumes Calderdale Borough retains a constant market share.

Convenience Retail Goods

- 3.118 Table 3.9 indicates that there is very limited capacity for additional convenience goods floorspace in the long term (just 28 sq. m net by 2031).
- There is a commitment for a retail unit (no named operator) and a five storey hotel at the site of the former Mytholm Works on King Street (ref. 12/01003/FUL), which would provide an additional 990 sq. m net convenience retail floorspace and an additional 110 sq. m net of comparison retail floorspace.

Table 3.10	Survey derived turnover of main foodstores compared with expected trading levels	
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Store	Benchmark Turnover (£m)	Survey Derived Turnover (£m)	Difference (£m)
Co-op, Market Street	6.7	5.8	-0.9
One Stop, Crown	1.0	0.3	-0.7
Street			

Source: NEMS Household Survey July 2016/Various sources for benchmark turnover

3.120 The Co-op store on Market Street and the One Stop store on Crown Street are both trading at below expected levels (by £0.9 million and £0.7 million respectively).

Comparison Retail Goods

- 3.121 There is a small amount of capacity for comparison goods floorspace over the long term (298 sq. m net by 2031).
- 3.122 A large proportion of this capacity (37%) could be accommodated by the delivery of the retail commitment mentioned above. Hebden Bridge has a high proportion of independent retail stores, which outnumber the few national multiples that include Boots and Fat Face.

Sowerby Bridge town centre

3.123 Table 3.11 below sets out the current convenience retail capacity in Sowerby Bridge and the capacity for additional convenience and comparison retail floorspace over the periods to 2021, 2026 and 2031.

Table 3.11 Quantitative capacity for additional convenience and comparison retail floorspace – Sowerby Bridge

Year	Convenience*		Compa	rison**
	£(m)^	sq. m (net)^	£(m)^	sq. m (net)^
At 2016	2.2	244	-	-
By 2021	2.8	311	0.4	74
By 2026	3.5	390	1.3	217
By 2031	4.1	454	2.5	377

*Convenience sales density of £9,000 per sq. m (based upon Aldi, Co-op, Lidl, One Stop, Sainsbury's and Tesco). No growth in floorspace efficiency over the period to 2031. **Comparison sales density of £5,000 per sq. m at 2016 increased by floorspace efficiencies to

2031 of 2.0% per annum.

^2021, 2026 and 2031 comparison retail capacity assumes Calderdale Borough retains a constant market share.

Convenience Retail Goods

3.124

Table 3.11 indicates that there is immediate capacity for additional convenience goods floorspace of 244 sq. m net. This increases to 390 sq. m net by 2026 and increases further to 454 sq. m net by 2031. The capacity in the medium to long term (2026 to 2031) is enough to accommodate two small convenience retail stores such as a Co-op, Sainsbury's Local or Tesco Express.

Table 3.12 Survey derived turnover of main foodstores compared with expected trading levels

Store	Benchmark Turnover (£m)	Survey Derived Turnover (£m)	Difference (£m)
Town Centre			
Lidl, Tuel Lane	6.5	9.5	3.0
Out of Centre Stores			
Tesco, Sowerby Street	17.0	18.3	1.3

Source: NEMS Household Survey July 2016/Various sources for benchmark turnover

3.125 Both the LidI store on Tuel Lane and the out-of-centre Tesco store on Sowerby Street are found to be trading at above expected levels when compared to company benchmark levels (by 46% and 8% respectively. The Sowerby Street Tesco store is located adjacent to the town centre boundary and so its performance is factored-in to an assessment of capacity for additional convenience retail floorspace.

Comparison Retail Goods

3.126 There is limited capacity for additional comparison retail floorspace in Sowerby Bridge until 2026 and even at this point, capacity is only 217 sq. m net. In the long term, by 2031, capacity for comparison goods floorspace increases to 377 sq. m net. This long term capacity for comparison goods floorspace in Sowerby Bridge town centre is enough capacity to accommodate a further comparison goods unit of sufficient size to accommodate a key attractor on the high street.

Todmorden town centre

3.127Table 3.13 below sets out the current convenience retail capacity in
Todmorden and the capacity for additional convenience and comparison retail
floorspace over the periods to 2021, 2026 and 2031.

 Table 3.13
 Quantitative capacity for additional convenience and comparison retail floorspace – Todmorden

Year	Convenience*		Compa	rison**
	£(m)^	sq. m (net)^	£(m)^	sq. m (net)^
At 2016	4.3	474	-	-
By 2021	4.9	543	0.3	63
By 2026	5.6	624	1.1	185
By 2031	6.2	690	2.2	322

*Convenience sales density of £9,000 per sq. m (based upon Aldi, Co-op, Lidl, One Stop, Sainsbury's and Tesco). No growth in floorspace efficiency over the period to 2031. **Comparison sales density of £5,000 per sq. m at 2016 increased by floorspace efficiencies to 2031 of 2.0% per annum.

^2021, 2026 and 2031 comparison retail capacity assumes Calderdale Borough retains a constant market share.

Convenience Retail Goods

- 3.128 Table 3.13 indicates that there is immediate capacity for additional convenience goods floorspace in Todmorden (474 sq. m net). This is assessed to rise to 543 sq. m net by 2021, 624 sq. m net by 2026 and 690 sq. m net by 2031. This long term capacity is enough to accommodate a medium sized foodstore or two to three small convenience stores.
- There is a commitment for a foodstore (Aldi is the named operator) at the site of the Abraham Ormerod Hospital and former cinema on Burnley Road (planning permission ref. 15/01647/FUL), which would provide an additional 912 sq. m net convenience floorspace and an additional 228 sq. m net comparison floorspace. If delivered, this commitment would absorb all of the capacity for convenience goods floorspace in the long term in Todmorden. The site of this commitment has been cleared.

Store	Benchmark Turnover (£m)	Survey Derived Turnover (£m)	Difference (£m)
One Stop, Bridge Street	1.7	0.4	-1.3
Lidl, Halifax Road	5.8	13.1	7.4

Source: NEMS Household Survey July 2016/Various sources for benchmark turnover

The One Stop on Bridge Street is underperforming (£0.4 million survey derived turnover) against its company average level (£1.7 million benchmark turnover). However, the Lidl store on Halifax Road is greatly exceeding company benchmark levels (by £7.4 million). However, whilst the store is undoubtedly performing very well, trading this much above company average as the household survey suggests is unlikely. Deep discounters are certainly proving popular having increased their market share both during and after the global financial crisis, so it is unsurprising that the Lidl store on Halifax Road is performing well.

Comparison Retail Goods

3.131 There is limited capacity over the period to 2031 for additional comparison floorspace, with capacity for comparison goods floorspace in Todmorden being 322 sq. m net at this time. Capacity in the longer term is generated by factoring-in growth pro-rata to the performance of town centre comparison retail floorspace. Aside from Boots, all other comparison stores are independent operators and more national multiples in the comparison goods sector would help improve Todmorden's retail offer.

District Centres

- 3.132 The retail capacity assessment at **Appendix 4** combines the market shares for district centres, to generate Borough-wide convenience retail capacity figures for local needs floorspace.
- 3.133 No convenience retail capacity is shown for Bailiff Bridge, Queens Road and West Vale given that the household survey did not pick up these centres as destinations for convenience goods shopping. Whilst these centres will not have a turnover of zero, the fact that these centres are not picked up suggests that they are not strong convenience retail destinations. The balance of probability is that the existing floorspace within these centres is trading at below expected levels and therefore, it is very likely that a no capacity position is correct.
- 3.134 Table 10 at **Appendix 4** sets out that there is no meaningful capacity for additional local needs convenience retail floorspace on a composite basis, until 2031 (267 sq. m net).
- 3.135 On a qualitative need basis, Bailiff Bridge, Northowram, Queens Road and West Vale all lack a convenience store operated by a national multiple. However, it should be noted that since the household survey interviews were

completed, a Tesco Express store has opened on Stainland Road in West Vale.

3.136 Table 17 at **Appendix 4** indicates that there is little immediate capacity for comparison floorspace within the district centres on a composite basis (258 sq. m net). However, this rises to a more significant 1,313 sq. m net by 2031.

Borough-wide Capacity 2016 – 2031

Convenience Retail Goods

- 3.137 Considering convenience retail capacity suggests that there is a reasonable amount of immediate capacity for approaching 1,596 sq. m net of additional convenience retail floorspace all of which is in four town centres including Brighouse, Elland, Sowerby Bridge and Todmorden. This is based upon a number of existing food stores (and most notably those in the deep discount retail sector) trading at above expected levels. All of this capacity is generated by the market share/performance of convenience retail floorspace in town centres (other than Halifax) and should be seen as the basis for encouraging further provision that can meet local needs, on the back of a consideration of qualitative deficiency, evidence of trading beyond expected benchmark levels and where intervention would achieve greatest benefit.
- 3.138 Year-on-year growth in convenience retail spending amongst Calderdale residents sees the capacity for additional convenience retail floorspace grow to nearly 3,000 sq. m net over the period to 2031.
- The convenience retail expenditure surplus identified in Calderdale Borough (£14.4 million at 2016) is much lower than the £81 million surplus identified at 2009 by the 2009 study, which subsequently rose to an £89 million surplus in 2014, a £106 million surplus in 2019 and a £131 million surplus in 2026. One reason for this is because the majority of food stores and convenience stores in the Borough are trading at below expected levels and these stores absorb a significant proportion of expenditure growth, when comparing the 2016 household survey results with the benchmark turnover of these stores.
- 3.140 The 2016 capacity figures do not take into account convenience retail commitments in the Borough. There are a number of commitments for additional convenience retail floorspace in Borough (3,540 sq. m net in total), which if implemented, would take up a significant proportion of the capacity for convenience goods floorspace in the long term.
- 3.141 However, it should be noted that just 254 sq. m net of committed convenience floorspace is located in Brighouse, with 1,504 sq. m net of committed convenience floorspace being located in Todmorden. There is no committed convenience floorspace in Elland and Sowerby Bridge. The remainder of the committed convenience floorspace (990 sq. m net) is located in Hebden Bridge and NLP has identified capacity for just 28 sq. m net of convenience floorspace in Hebden Bridge by 2031.

Comparison Retail Goods

- 3.142 The 2009 study adopts the same approach as this 2016 study, so far as the comparison retail sector is concerned, in assuming that the recorded turnover of comparison retail floorspace (based upon empirical research) is its benchmark position.
- 3.143 The 2009 study found that there was surplus comparison retail expenditure at 2026 in the order of £370.4 million. This is significantly in excess of the £65.7 million recorded in this study.
- 3.144 The reduced capacity figures in this study are a result of the continued rise in the comparison retail sector of on-line businesses (it is important to account for this as growth in this sector does not in the main generate capacity for additional comparison retail floorspace) and the more efficient use of high street floorspace in part as a response to on-line competition. NLP has utilised a sales efficiency growth rate of 2.0% in the comparison goods sector as part of this 2016 study. However, the 2009 study utilised a sales efficiency growth rate of 1.5% in the comparison goods sector.
- The long term surplus across Calderdale Borough (£126.0 million in 2031) provides scope for significant additional comparison retail floorspace across the Borough. Using a realistic average sales density of £7,000 per sq. m for Halifax, £5,000 per sq. m for the remaining town centres and £3,000 per sq. m for the district centres, this generates capacity for approximately 8,500 sq. m net additional floorspace in 2026 and approximately 14,750 sq. m net additional floorspace in 2031.

4.0 Assessment of Commercial Leisure Provision

Leisure Trends

- 4.1 The demand for commercial leisure facilities has increased significantly during the last 25 years. The growth in the commercial leisure sector was particularly strong during the late 1980s and again in the mid-1990s. Average household expenditure on leisure services increased in real terms by 93% between 1984 and 1995 (source: Family Expenditure Survey), and by a further 48% between 1995 and 2005. The sector has experienced more limited growth since 2005. Whilst new destination leisure attractions have entered the market place with success and country parks, heritage destinations and cultural attractions have out-performed the leisure market in the last decade, commercial leisure attractions have fared less well generally.
- 4.2 The Eureka National Children's Museum in Halifax was ranked 144th nationally (England) in terms of visitor numbers in 2015. In 2015, there were approximately 290,000 visitors to Eureka, albeit, visitor numbers were down by 4.2% in comparison with 2014. Elsewhere in Calderdale, the Halifax Visitor Centre & Art Gallery was ranked 838th nationally with approximately 15,000 visitors in 2015 and Hardcastle Crags was ranked 991st with approximately 7,000 visitors in 2015 (all ranked out of 1,318 tourism destinations)⁴.
- ^{4.3} Many analysts consider that the commercial leisure market has reached saturation in some sub-sectors, such as bingo, large format multiplex cinemas and tenpin bowling. The economic downturn since 2008 has curbed further growth in leisure spending and this sector is an early casualty of reduced disposable income, albeit the concept of the 'staycation' has delivered positive repercussions for the domestic commercial leisure industry. Visit England notes that attendance at leisure/theme parks stagnated over the period 2005-2013, with the sector considered to be in decline⁵.
- The mid-1990s saw the expansion of major leisure parks which are generally anchored by a large multiplex cinema and offer other facilities such as ten-pin bowling, bingo, nightclubs, health and fitness clubs, themed destination restaurants, pub/restaurants, children's nurseries and budget hotels.
 Commercial leisure facilities have typically been located on the edge of town centres or in out-of-centre locations, with good road access.
- 4.5 The cinema market remains an important sector as this is often an anchor leisure use and provides footfall for linked-trips other uses. This sector is ever changing and as of July 2016, the Odeon and UCI Cinemas Group has been sold to a US operator AMC, which already has a number of UK cinemas.

⁴ Visit Britain – 2015 Full Attractions Listing

⁵ Visit England – Visitor Attraction Trends in England 2013 (does not include data for Merlin Entertainments)

- 4.6 Operators such as City Screen, Mainline Pictures, Reel Cinemas and The Light have opened new cinemas or taken over small cinemas in recent years. Premises operated by The Light cinemas are moving away from the standard cinema formats followed by Odeon and Vue to try and create more of a 'cultural' centre for cinemagoers including a bar/restaurant space and more intimate environment. Digital projection has driven a trend towards development of cinemas with fewer screens, and town centre locations are back in vogue. Town centre cinemas tend to occupy a smaller footprint and are typically developed alongside other commercial businesses, including cafés, bars and restaurants. Hebden Bride Picture House in Hebden Bridge and the Rex Cinema in Elland are examples of independent cinemas in Calderdale.
- 4.7 In November 2012, Cineworld acquired the arthouse cinema chain Picturehouse, which at the time operated from 21 locations. The acquisition of Picturehouse extended the Cineworld Group portfolio to over 120 venues. Cineworld has confirmed that it is on track to open a further 25 locations by the end of 2017. In January 2014 Cineworld secured expansion internationally, in Eastern Europe and Israel, when it purchased 100 multiplex cinemas from the Cinema City International (CCI) portfolio. 2015 press coverage charts its successes in the Czech Republic and Romania.
- 4.8 In recent years and prior to its recent sale, Odeon had continued to improve and expand its estate, which included a new food and drink partnership, with Costa Coffee opening outlets in cinema foyers. Cineworld has introduced Starbucks outlets at a number of sites. Vue has also identified further opportunities for multiplex cinemas in the UK, with the intention to explore new acquisition opportunities.
- 4.9 Although the private health and fitness market has remained strong, it is the no-contract, budget operators such as easyGym and Pure Gym (which merged with The Gym Group in 2014 and acquired the LA Fitness business in May 2015) that are currently seeking premises across the UK and continue to grow rapidly. A Pure Gym is located in the Broad Street Plaza in Halifax. The economic downturn and squeeze on disposable income has had an impact on established multiple operators, most notably Fitness First, which was recently forced to close a number of outlets as a result of falling membership revenues.
- 4.10 Since the late 1990s the high street has seen a significant increase in the number of cafés, coffee shops and sandwich emporia. This includes the Cafe Nero, Costa Coffee and Starbucks coffee shop chains and sandwich providers Eat, Pret a Manger and Subway, alongside a growth in high-end independent retailers.
- 4.11 A trend for 'posh' fast food, started by the likes of Gourmet Burger Kitchen, has extended into the independent sector and themed venues (such as 'street food' outlets) and is delivering new vibrancy to some high streets, but may be shortlived. In fact, there is a trend for such premises to be described as 'pop-up' restaurants, and many may well be so as operators take advantage of a more flexible Government policy towards town centre uses as temporary changes of

uses (for up to two years) are sanctioned through permitted development rights.

Commercial Leisure – Calderdale Borough

- 4.12 NLP has completed a desk-based assessment of the commercial leisure uses in Calderdale Borough, setting this in context with provision in locations outside of the Borough that has the potential to divert expenditure away from it.
- 4.13 The NLP assessment is informed by questions in the 2016 household survey relating to leisure habits and patterns. The findings are summarised below and the full results set out at **Appendix 5**.

Broad Street Plaza, Halifax

4.14 It is considered that the leisure offer in Halifax town centre has improved in recent years. The Broad Street Plaza in Halifax opened at the end of 2012. Broad Street Plaza is a large purpose built leisure complex built on the site of a former Netto foodstore, to the north of the town centre. It is anchored by a Vue cinema and contains a number of restaurant operators (Frankie & Benny's, Harvester, Nando's and Pizza Express) as well as a gym operator (Pure Gym). Broad Street Plaza is one of a limited number of commercial leisure schemes delivered during the immediate aftermath of the global financial crisis and has improved the Halifax town centre commercial leisure offer and is a main attractor to the town.

The Piece Hall, Halifax

4.15 The leisure offer of Halifax town centre is due to improve further with The Piece Hall transformation due to open in late 2017. The Piece Hall transformation will improve Halifax town centre's cultural offer with shops, restaurants, events and a Heritage Interpretation Centre. It is part of a wider project to improve the area including Square Chapel (an arts venue), Orange Box (a children's activity centre) and a new library.

Catchment Potential

- 4.16 Commercial leisure facilities outside of 'destination' attractions attract the majority of their trade from residents living within 20 minutes' travel time. Large leisure facilities which typically include an offer such as multiplex cinema, tenpin bowling, ice rink and family entertainment centre tend to be developed as large out-of-centre leisure parks as they require a large catchment population. That said, there is a marked trend away from out-of-centre leisure facilities with cinema-led mixed use developments returning to town centres on the back of advances in digital screening technology meaning that a greater number of smaller cinemas can be operated efficiently.
- 4.17 The 2016 population of Calderdale is estimated at some 209,000. The catchment area for facilities in the Borough is likely to extend beyond its boundary, into Bradford and Kirklees to the east and to a lesser extent, into

Burnley, Oldham, Pendle, Rochdale and Rossendale to the west. Leisure facilities in neighbouring authority areas will also draw residents of Calderdale out of the borough for leisure activity, particularly in locations to the west of the Borough, which are nearer to Burnley and Rochdale than Halifax.

Cinemas and Theatres

- 4.18 Within Calderdale Borough there is just one multiplex cinema, this being the Vue cinema on Broad Street, Halifax. Aside from this, there are two small-scale cinemas, these being Hebden Bridge Picture House on New Road, Hebden Bridge and the Rex Cinema on Corporation Street in Elland.
- 4.19 Data from the NLP VeNU⁶ database shows that the Vue cinema in Halifax has 9 screens and 1,400 seats.
- 4.20 There are other multiplex cinemas close to Calderdale Borough, including the Showcase Cinema on Gelderd Road in Birstall, the Empire Cinema on John William Street in Huddersfield, the Odeon Cinema on Bradley Mills Road in Huddersfield and the Odeon Cinema on Sandbrook Way in Rochdale.
- 4.21 The results of the household survey that inform this study identify that over 35% of the Calderdale residents of the study area do not consider themselves to be cinema-goers. Of those that do, according to the household survey, the four most commonly cited cinemas both inside and outside the Borough include Vue in Halifax (44%), Showcase in Birstall (13%), the Rex cinema in Elland (7%) and Hebden Bridge Picture House (also 7%).
- 4.22 NLP has developed the 'CINeSCOPE' ^{footnote 7} intelligence tool which provides a dataset containing the location and scale of existing, committed and proposed cinema outlets. Using population density data and patronage rates the model identifies potential 'hotspots' for future provision.
- 4.23 On the basis of the household survey that approximately two-thirds (65%) consider themselves as cinema goers, the number of cinema goers in Calderdale Borough is some 136,000. The national average annual visits per screen are 47,000 and the average annual visits per annum are 2.8. Cinema-goers in Calderdale Borough might be expected to make some 380,000 visits per year, which supports seven screens with 50,000 visits to each screen annually. The optimal number of visits per annum per screen is 75,000 suggesting scope for five to seven screens, having regard to local patronage levels.
- 4.24 However, it makes more sense think strategically about the wider region, rather than the Calderdale Borough level. The current criteria for defining Travel To Works Areas (TTWAs) are that at least 75% of the area's resident workforce work in the area and at least 75% of the people who work in the area also live

⁶ NLP VeNU is a comprehensive database of cinemas and screens

⁷ NLP CINeSCOPE is a cinema capacity model for UK locations informed by NLP VeNU and demographic data and trends

in the area. The area must also have an economically active population of at least 3,500.

- 4.25 In 2016, the Calderdale TTWA is assessed as including a population of 212,911. Based on the optimal number of visits per annum of 2.8 visits per person, this equates to 596,151 visits per annum. Dividing the total number of visits by the mid-point between the optimal number of annual visits per screen and national average annual visits per screen (just under 61,000 visits per screen), gives a screen potential of 9.8 screens. Calderdale has 11 screens, so based on our analysis; there is a screen surplus of 1.2 screens in the Calderdale TTWA in 2016.
- 4.26 Outside of the commercial cinema provision, a particular strength is the independent cinemas in Calderdale Borough, which sets Calderdale apart from town centres that contain only commercial cinema provision, by offering an alternative to typical modern cinemas.
- 4.27 The Hebden Bridge Picture House in Hebden Bridge shows evening screenings daily, matinees at weekends and mid-morning screenings during school holidays. 16 to 26 films are screened per month, with programmes ranging from mainstream to art-house and foreign language, with regular screenings of specialist films and touring programmes from a range of organisations, including the British Film Institute.
- 4.28 The Rex Cinema in Elland is one of the oldest purpose built, structurally unaltered cinemas in the country. It has a reputation of a well-run, comfortable but traditional cinema showing a wide range of films. It attracts customers from as far as Leeds and Manchester and has very low ticket prices.

Health and Fitness Clubs

- 4.29 There are a small number of national health and fitness operators based in Calderdale, including: DW Sports Fitness, Fitness First and Pure Gym. These national operators are supplemented by a number of independent health and fitness clubs. There are numerous Council owned health and fitness clubs in the surrounding area including Brighouse Swimming Pool and Fitness Centre, Halifax Swimming Pool, Mixenden Activity Centre, North Bridge Leisure Centre, Sowerby Bridge Swimming Pool and Fitness Centre, Spring Hall Sports Facility, The MBi Shay Stadium and Todmorden Sports Centre.
- 4.30 The results of the telephone household survey indicate that residents of Ripponden are the most likely Borough residents to use health and fitness facilities; residents of Halifax are least likely to use gym provision. Despite this, some 16% of gym-goers identify facilities in Halifax as the location of the health and fitness club visited. Other destinations identified by a significant proportion of gym-goers are Sowerby Bridge Swimming Pool and Fitness Centre (7%) and Bradford (also 7%). Aside from this, there is limited usage of destinations outside of the Borough.

4.31 Calderdale Borough is fairly well represented by health and fitness clubs and there is no immediate qualitative need for more health and fitness clubs.

Family Entertainment Centres Including Ten-pin Bowling

- 4.32 There is just one ten-pin bowling alley in Calderdale, this being Electric Bowl on Commercial Street in Halifax.
- 4.33 At 2016, the proportion of residents of the study area claiming not to visit a family entertainment centre was 61%. Amongst those residents who do participate Electric Bowl in Halifax leads the way with a market share greater than 36%. There is a fair amount of outflow of expenditure to destinations outside of the Borough including Bradford (13%), Hollywood Bowl on Vicar Lane in Bradford (11%) and Huddersfield (9%). Patronage being directed to Bradford is to be expected given that parts of the study area (and Calderdale Borough) are closer to family entertainment centres in Bradford and Huddersfield than facilities in Halifax.
- 4.34 The impact of the economic downturn on levels of disposable income and the general leisure industry and leisure-goer shift away from multi-entertainment venues suggests that any capacity for growth in the family entertainment sector will, if at all, be in the longer term.
- 4.35 Nationally, commentators have coined the term 'Boutique bowling' for the reinvention of ten-pin bowling delivered alongside 'posh' or 'street' fast food.
 'All Star Lanes' and 'Dog Bowl' in Manchester are examples of 'Boutique bowling' facilities. The pairing of these facilities with a food and drink offer orientated towards young adults has given ten-pin bowling a makeover and a much needed twist to begin to re-establishing its image in the leisure market.
- 4.36 There is a qualitative need for 'boutique bowling' in Calderdale Borough, which would offer an alternative to Electric Bowl in Halifax.
- 4.37 There are no ice skating rinks in Calderdale. The nearest facility is Bradford Ice Arena on Little Horton Lane in Bradford, which is 11 km north east of Halifax.

Bingo/Casino

- 4.38 There is just one mainstream bingo hall in Calderdale, this being Mecca Bingo on Broad Street in Halifax.
- 4.39 The 2016 household survey affirms that bingo/casino-going is a niche market, with only 12% of residents of the study area engaged in the activity. Both Mecca Bingo in Halifax and facilities in Bradford each attract 23% market share of bingo-goers, with facilities in Halifax attracting a further 11% market share. We are not aware of any applications received for new bingo facilities, extensions or improvements since the 2009 study, which supports the widely held view that there is stagnation in this sector in all but the highest order

centres and that bingo halls have not recovered from the dual effects of economic downturn and a ban on smoking indoors in public places/workplaces.

- 4.40 A bingo hall to the west of the Borough would reduce the need for residents to travel. Currently, residents of Zone 11 travel to bingo halls in Burnley and Rochdale.
- 4.41 The nearest casinos are Grosvenor Casino and Napoleons Casino, both with a presence in Bradford and Leeds.

Indoor Play Centres

- 4.42 In recent years there has been a marked rise in the number of indoor play centres nationally, which are seen as a key growth area in the commercial leisure sector.
- 4.43 Originally indoor play centres were primarily provided as enticement to chain operator family pub-restaurants but in recent years the independent operator has started to dominate the industry.
- 4.44 In Calderdale, there are numerous indoor play centres including Blue Frog on Stead Street in Halifax, Rolypolys on Bradford Road in Brighouse, Upsy Daisy's on Moderna Way in Mytholmroyd and Adventure World on James Street in Elland.

Other Commercial Leisure Provision

- 4.45 The Eureka National Children's Museum in Halifax is an interactive museum designed to inspire children into learning through active play. It is a major tourist destination in Halifax and Calderdale Borough as a whole.
- 4.46 83% of residents of the study area eat out in restaurants. 34% of interviewees noted visiting restaurants in Halifax, 11% identified restaurants in Bradford and a further 11% identified restaurants in Leeds. Of the defined town centres in the Borough (Halifax aside), Brighouse (9%), Sowerby Bridge (7%), Hebden Bridge (6%) and Todmorden (5%) were also identified by a significant proportion of restaurant-goers.
- 4.47 The strong market share of residents visiting restaurants in Halifax is clearly a reflection of Halifax being the largest and principal centre in the Borough, with a wide range of restaurants, including centrally Beafeater, Frankie and Bennys, Harvester, Nandos, Pizza Express and TGI Fridays, many of which are located in the Broad Street Plaza.
- 4.48 Elland attracts a less than 2% market share and it is clear that there is scope for a qualitative improvement of the existing restaurant offer in Elland, to better compete with the other defined town centres in the Borough.
- Pubs, bars and nightclubs attract 59% of residents of the study area, with
 Halifax accounting for 34% market share. Sowerby Bridge (10%) and
 Brighouse (9%) are cited by a significant proportion of residents and to a lesser

extent Hebden Bridge (8%) and Todmorden (7%) with Elland attracting a less than 2% market share.

- 4.50 The most commonly cited destinations for visits to museums and art galleries are higher order centres outside of the Borough, including Leeds (19%), Manchester (17%) and Central London (14%). Within the Borough, the most popular destination is the Bankfield Museum on Boothtown Road in Halifax (6%), which provides insight into the history of Halifax.
- 4.51 56% of residents frequently visit theatres/concerts/live music. Both Leeds (18%) and the Victoria Theatre in Halifax (also 18%) attract strong market share, with Manchester (15%) not far behind. It seems unlikely that any intervention could lead to a shift away from these higher order centres.

Summary

- 4.52 Calderdale Borough is predominantly rural or urban fringe in character, with only a little over 13% of the Borough being regarded as part of any built-up urban area. The choice and range of shopping and leisure facilities outside Calderdale Borough means that there is much movement to more distant locations for shopping and leisure activities.
- 4.53 Halifax is the strategic town in the Borough and is by far the largest town in the Borough. To illustrate this point, Halifax has 752 retail units and a floorspace of 149,233 sq. m gross. The second largest town centre in terms of the amount of floorspace is Brighouse with 35,163 sq. m gross. This is followed by Sowerby Bridge (18,647 sq. m gross) and Hebden Bridge (18,516 sq. m gross). Todmorden (15,328 sq. m gross) and Elland (14,938 sq. m gross) are the smallest town centres in the Borough in terms of the amount of floorspace.
- 4.54 Larger leisure facilities that require a large catchment such as cinemas and theatres, ten-pin bowling, bingo and museums and art galleries are located in Halifax town centre. Residents of Calderdale Borough travel a short distance to Halifax for these facilities or to facilities outside of the Borough, which is likely dependent on the distance they are from Halifax.
- 4.55 Calderdale Borough has a good retention rate for health & fitness clubs and leisure activities that generally have narrower catchment areas, such as public houses and bars. There are eight Council-owned sports and fitness centres in the Borough, along with privately run facilities. Pubs are located throughout the Borough and bars and night clubs tend to be located in Halifax. People tend to travel a short distance to visit health & fitness clubs and public houses to facilities either near home or their workplace.
- 4.56 There is a qualitative need for additional restaurant provision in Elland, a bingo hall to the west of the Borough and 'boutique bowling' in the Borough. This would help to retain expenditure on leisure within Calderdale Borough.

Summary of Household Survey (Leisure Results)

4.58

Table 4.1 below provides a summary of the household survey results in the leisure sector.

Table 4.1	Summary of the household survey results in the leisure sector
	ourning of the household survey results in the leisure sector

Activity	Market Share (Rank 1)*	Market Share (Rank 2)*	Market Share (Rank 3)*
Restaurants	Halifax – 34%	Bradford – 11%	Leeds – 11%
Pubs/Bars/Nightclubs	Halifax – 34%	Sowerby Bridge - 10%	Brighouse – 9%
Cinema	Vue, Halifax – 44%	Showcase, Birstall – 13%	Rex Cinema, Elland – 7%
Family Entertainment (ten-pin bowling/Skating Rink)	Electric Bowl, Halifax – 36%	Bradford – 13%	Halifax – 11%
Bingo/Casino	Bradford – 23%	Mecca Bingo, Halifax – 23%	Halifax – 11%
Theatres/Concerts/Live Music	Leeds – 18%	The Victoria Theatre, Halifax – 18%	Manchester – 15%
Museums and Art Galleries	Leeds – 19%	Manchester – 17%	Central London – 14%
Health and Fitness	Halifax – 16%	Sowerby Bridge Swimming Pool and Fitness Centre, Sowerby Bridge – 7%	Bradford – 7%

Source: NEMS Household Survey July 2016/Various sources for benchmark turnover

*Based on weighted household survey results, filtered to exclude 'don't know/varies' and 'don't do these activities'

5.0 Accommodating Growth and Policy Review

Introduction

- 5.1 The National Planning Policy Framework (NPPF) indicates (paragraph 23) that local plans should allocate a range of suitable sites to meet the scale and type of retail, leisure and other development needed in town centres. The need for development should be met in full and should not be compromised by limited site supply. In order to accommodate growth, local planning authorities should assess the need to expand town centres to ensure a sufficient supply of suitable sites. The NPPF (paragraphs 23 and 24) indicates local planning authorities should apply a sequential approach for development.
- 5.2 The National Planning Policy Guidance indicates that development plans should develop (and keep under review) town centre strategies that plan for a 3-5 year period, whilst also giving a Local Plan lifetime view. Plans should identify the scale of need for main town centre uses and assess whether the need can be met on town centre sites or through expanding centres, with the sequential test to be followed.
- 5.3 The PPG acknowledges that not all successful town centre regeneration projects are retail-led, or will involve significant new developments. Public realm, transport and accessibility improvements can play important roles. Town centre car parking strategies, in a move away from resisting parking in town centres, are to encourage improvements to both the quality and quantity of car parking provision, where required to enhance the performance of town centres.
- 5.4 This section assesses the scope to accommodate growth within Calderdale Borough's main centres.

Floorspace Projections

- 5.5 The floorspace projections set out in the previous sections assume that other competing centres will improve in the future. There are a number of issues that may influence the scope for new floorspace and the appropriate location for this development, as follows:
 - major retail developments in competing centres e.g. Bradford and Leeds;
 - the re-occupation of vacant retail floorspace;
 - the availability of land to accommodate new development;
 - the reliability of long term expenditure projections;
 - the effect of internet/home shopping on the demand for retail property;
 - the level of operator demand for floorspace in Calderdale Borough;
 - the ability of Calderdale Borough to maintain its existing market share of expenditure in the future in the face of increasing competition; and
 - the potential impact new development may have on existing centres.

- 5.6 The PPG suggests town centre strategies should plan for a 3-5 year period, but the longer term plan period should be considered. Projections up to 2026 are realistic and are based on up to date forecasts, which take into account the effects of the most recent recession. The long term floorspace projections (up to 2031) should be treated with caution and should only be used as a broad guide, particularly when translated into the development plan allocations or when used to guide development management decisions. Long term forecasts may be subject to change due to unforeseen circumstances. Projected surplus expenditure is primarily attributable to projected growth in spending per capita. If the growth in expenditure is lower than that forecast then the scope for additional space will reduce. Long term projections should be monitored and kept under review.
- 5.7 The expenditure projections in this study take into account home shopping made through non-retail businesses, because special forms of trading have been excluded. The study assumes that special forms of trading will increase in the future, including the growth of internet shopping. The impact of internet growth on the demand for retail floorspace is unclear. Some retailers' home delivery and internet services utilise existing stores rather than warehouses. Growth in internet sales will not always reduce the demand for shop floorspace. In addition, some of the growth in internet sales may divert trade away from mail order companies rather than retail operators. Overall, the long term impact of home shopping on expenditure projections is uncertain.
- 5.8 The quantitative and qualitative assessment of the potential for new Class A retail floorspace within the previous sections suggests there is scope for new development within Calderdale Borough during the Plan period (to 2031). This section examines the opportunities for accommodating this projected growth and assesses potential to accommodate this floorspace.
- 5.9 The projections up to 2031 suggest there is scope for 2,964 sq. m net of additional convenience goods floorspace (Table 5.1) and 14,767 sq. m net of additional comparison goods floorspace (Table 5.2). In total, there is capacity for 17,731 sq. m net in Calderdale Borough over the period to 2031⁸.

⁸ This does not take account of committed retail floorspace.

5.10 The convenience goods projections suggest new floorspace could be distributed as follows, based upon a constant market share approach:

Location	Additional Convenience Retail Floorspace (sq. m net)			
	By 2021	By 2026	By 2031	
Halifax	-	-	-	
Brighouse	613	753	868	
Elland	473	574	657	
Hebden Bridge	-	3	28	
Sowerby Bridge	311	390	454	
Todmorden	543	624	690	
District Centres	14	153	267	
Total	1,954	2,495	2,964	

Table 5.1 Convenience Goods Retail Floorspace Projections (Net)

Source: Table 10, Appendix 4

The comparison goods projections suggest new floorspace could be distributed as follows, again on a constant market share approach:

Table 5.2	Comparison Goods Retail Floorspace Projections (Net))

Location	Additional Comparison Retail Floorspace (sq. m net)		
	By 2021	By 2026	By 2031
Halifax	2,229	6,535	11,351
Brighouse	95	280	486
Elland	122	357	620
Hebden Bridge	58	171	298
Sowerby Bridge	74	217	377
Todmorden	63	185	322
District Centres	258	756	1,313
Total	2,899	8,502	14,767

Source: Table 19, Appendix 4

5.12

5.11

The sequential approach suggests that designated centres should be the first choice for retail and leisure development. Development should be appropriate in terms of scale and nature to the centre in which it is located. In accommodating future growth, the following issues should be taken into consideration:

- What is the locational area of need the development seeks to serve and what existing centre could potentially fulfil the identified area of need?
- Is the nature and scale of development likely to serve a wide catchment area?
- Is a site available in one of the designated centres, including vacant premises and will this site meet the identified need?
- If the development has a more localised catchment area, is a site available in a local centre and will this site meet the identified need?
- 5.13 The existing stock of premises will have a role to play in accommodating projected growth. The retail capacity analysis in this report assumes that

existing comparison retail floorspace can, on average, increase its turnover to sales floorspace densities. For comparison goods, a growth rate of 2.0% per annum is assumed.

- 5.14 In addition to the growth in sales densities, vacant shops could help to accommodate future growth. There are currently 296 vacant units within the 14 defined town and district centres in the Borough, which equates to an overall vacancy rate of 15.5%, which is above the national average as recorded by Experian GOAD (11.2%). Existing vacant floorspace amounts to around 36,740 sq. m gross (giving an average unit size of 124 sq. m gross). Over half (59%) of this vacant floorspace is in Halifax, with a further 30% of this vacant floorspace in the five other defined town centres and 12% of the vacant floorspace in the Borough being located in the eight district centres.
- 5.15 Vacant premises in Halifax and the other defined town centres should contribute to accommodating future growth in expenditure available. There will always be a certain proportion of units vacant as part of a natural churn. However, a target would be for vacancy levels in the town centres to fall to the pre-recession national average (i.e. approximately 8%). If this reduction in vacancy rate is achieved then this might equate to some 17,732 sq. m gross (12,412 sq. m net) of Class A1 to A5 floorspace. It is noteworthy that town centre floorspace coming back into use is likely to be across a broad range of uses and not just retail (Class A1).
- 5.16 Within town centres, many high street multiple comparison retailers have changed their format. High street national multiples have increasingly sought larger modern shop units (over 200 sq. m) with an increasing polarisation of activity into the larger regional and sub-regional centres. Operator demand for space has decreased during the recession and, of those national multiples looking for space many prefer to locate in larger centres.
- 5.17 The continuation of these trends will influence future operator requirements in Calderdale Borough, with smaller vacant units becoming less attractive for new multiple occupiers, and retailers increasingly looking to relocate into larger units in higher order centres. However, smaller vacant units could still be attractive to independent traders and non-retail services.
- 5.18 The largest vacant units in the Borough are as follows:
 - Halifax: North Bridge (1,856 sq. m gross), Great Albion Street (832 sq. m gross), 60 Horton Street (818 sq. m gross), Deal Street (758 sq. m gross);
 - Brighouse: 2 Owler Ings Road (676 sq. m gross), Lawson Road (472 sq. m gross);
 - Elland: Southgate (231 sq. m gross)⁹, Catherine Street (179 sq. m gross), 46 Southgate (174 sq. m gross);

⁹ Southgate in Elland has been re-occupied since the Council's audit of facilities and is now operating as a public house

- Hebden Bridge 4 New Road (289 sq. m gross), Holme Street (212 sq. m gross)¹⁰, 2 Crown Street (194 sq. m gross);
- Sowerby Bridge: 3 Hollins Mill Lane (1,047 sq. m gross); and
- Todmorden: 55 Halifax Road (215 sq. m gross), 4 Fielden Square (108 sq. m gross).
- 5.19 On the basis of size, some of these vacant units are likely to be attractive to major retailers. However, there are of course a number of other market factors which dictate whether a retailer seeks a presence within a town centre.

Policy Background

- 5.20 Table 6.1 of the Replacement Calderdale UDP (2006) identifies Halifax as a major town centre and Brighouse, Elland, Hebden Bridge, Sowerby Bridge and Todmorden as town centres. There are a number of local centres defined including King Cross, Mytholmroyd, Queens Road, Northowram, Ripponden, Hipperholme and West Vale, along with 11 local shopping areas, which are not shown on the proposals map.
- 5.21 As set out in Policy S2: Criteria for Assessing Retail Developments, applications for all retail developments will be assessed on the basis of the following criteria:
 - The proposals relate to the role, scale and character of the centre and the catchment the development is intended to serve;
 - The development creates no unacceptable environmental, amenity, traffic, safety, or other problems;
 - The development preserves or enhances Conservation Areas and does not adversely affect Listed Buildings or their settings, where these are material considerations; and
 - All other relevant UDP Policies are met.
- 5.22 For all locations not within town centres (Part B):
 - The 'need' for the development is demonstrated;
 - Having been flexible about the scale, format and design of the development and the provision of car parking, there are no reasonable prospects of the proposed development being accommodated on an alternative town centre site(s);
 - There will be no serious effect (either on its own or cumulatively with other similar permissions) upon the vitality and viability of any nearby town centre, as a whole;
 - The proposed development is located where it can serve shoppers using public transport or other modes of transport such as pedestrians or cyclists as well as those travelling by car;

¹⁰ Holme Street in Hebden Bridge has been converted into residential uses since the Council's audit of facilities

- The likely effect on overall travel patterns and car use, the objective being the reduction in travel mileage;
- The implications for other relevant UDP policies which relate to the use of the site; and
- The development would not undermine the retail strategy of the Plan.
- 5.23 Part B is inconsistent with the NPPF and will need to be updated as part of the forthcoming Local Plan. Need is not a retail test in the NPPF and an applicant is not required to demonstrate the need for a development.
- 5.24 Para 27 of the NPPF refers to where an application fails to satisfy the sequential test or is likely to have a 'significant adverse impact' on existing, committed, and planned public and private investment or on town centre vitality and viability, it should be refused. The forthcoming Local Plan should refer to 'significant adverse impact' on the vitality and viability of any town centre rather than 'no serious effect'.
- 5.25 As set out in *Policy S3: Local Shopping Outside Centres*, development of small scale retailing intended to meet local needs in out-of-centre locations will be permitted where there is a deficiency in the general area of the proposed development, subject to the criteria in Policy S2 (Part A) and other relevant UDP Policies.
- 5.26 Annex 2 of the NPPF provides definitions of these designations, as follows:

Town centre: Area defined 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. 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.

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).

Primary and 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.

- 5.27 Whilst '*district centre*' is not defined in the NPPF, they typically 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.
- 5.28 Again '*local centre*' is not defined in the NPPF; however, they typically comprise 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 post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette.

5.29 The NPPF indicates four separate designations within town centres can be considered and each has a different policy objective, as follows:

- town centre boundaries vitality and viability protection and application of the sequential approach;
- primary shopping area application of the sequential approach;
- primary shopping frontages maintaining the predominance of Class A1 retail use; and
- secondary shopping frontages maintaining the mix of retail/non-retail uses.
- 5.30 The NPPF suggests that in drawing up development plans, local authorities should, in addition to defining the extent of town centres and primary shopping areas, define primary and secondary frontages within designated centres, and set policies that make clear which uses will be permitted in such locations. The NPPF provides limited guidance on the approach policies should adopt. The NPPF glossary indicates that primary frontages are likely to include a high proportion of retail uses which may include food and drink, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.
- 5.31 The NPPF (paragraph 23) also suggests competitive town centres should be promoted that provide customer choice and a diverse retail offer reflecting the individuality of town centres. This implies the most appropriate approach is likely to vary from centre to centre.
- 5.32 The NPPF provides limited guidance on how these areas, particularly shopping frontages should be identified. Traditionally, key factors that can be adopted to identify the extent of the primary shopping area, and primary and secondary frontages include:
 - composition of uses: the proportion of retail uses within the frontage based upon the Goad surveys of the town centres. Primary shopping frontages would comprise higher proportions of A1 retail uses than secondary shopping frontages;
 - prime rental levels: analysis of Zone A rental levels of units within the centres sourced from Valuation Office (VOA) website, with primary shopping frontages expected to achieve higher rental levels than the secondary frontages;
 - pedestrian flows: level of pedestrian flows within particular areas/ frontages of the centre identified from visits to the centre, with the highest pedestrian flows in the primary shopping frontage;
 - key anchor stores: the presence of key anchor stores such as department stores or foodstores can also identify the extent of the Primary Shopping Area and key frontages.

- 5.33 The PPG sets out that emerging development plan policies should continue to include boundaries. A clear definition of each boundaries and policies the designation relates to should be provided, in order to ensure policies are not open to misinterpretation.
- 5.34 When considering emerging town and local centre policies, the Council needs to consider the following issues:
 - Is it necessary to designate separate town centre boundaries and shopping areas, or will one boundary be sufficient?
 - Is it necessary to define separate primary and secondary shopping frontages or will one frontage be appropriate?
 - Should the designated shopping frontages relate to the same area as the shopping area or town centre boundary?
- 5.35 The NPPF requires planning policies to be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. This approach includes defining the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres and allocating suitable sites for retail and other main town centre uses.
- 5.36 Town centre boundaries, primary shopping frontages and secondary shopping frontages are shown on the Proposals Map of the Replacement Calderdale UDP (2006). The Primary Shopping Area (PSA) is the area where retail uses/ development is concentrated generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage.
- 5.37 A Town Centre boundary typically covers a wider area than the PSA, and includes other non-retail town centre uses, such as churches, car parks, leisure and employment uses.

Impact Thresholds

- 5.38 The NPPG states that if setting a locally appropriate threshold, it is 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
 - the impact on any other planned investment.
- 5.39 Of the considerations listed above, NLP considers that there can be practical difficulties with basing a local floorspace threshold on the scale of known proposals. This is because the Local Plan is intended to guide development over the next period to 2031, and the great majority of schemes that might

come forward during this period will not yet be conceived and/or known about by the Council.

- 5.40 Also of relevance to the consideration of locally set impact thresholds is the application of the sequential approach test. The implication of the Dundee Judgment (Supreme Court Judgment: Tesco v Dundee City Council (21 March 2012)) is that applicants are required to consider whether a potential alternative site can accommodate the development proposed and not some alternative scheme that is materially different in purpose. However, the implication of the more recent Mansfield Judgment (High Court Judgment: Aldergate v Mansfield District Council (1 June 2016)) dilutes this implication of the Dundee Judgment somewhat in that a site must be suitable and available for the broad type of development, i.e. the size, type and range of goods as opposed to the named operator's specific requirements [our emphasis].
- 5.41 It is likely that only larger centres could accommodate developments of, say, over 2,500 sq. m gross (i.e. applicants employing a reasonable degree of flexibility in respect of a scheme located outside one of the smaller centres would most likely be able to demonstrate that the sequential approach test is passed by virtue of a lack of suitable sites/buildings) and it is therefore important that the impact of such development in edge-of-centre and out-ofcentre locations is assessed.
- 5.42 If the NPPF threshold (2,500 sq. m gross) was adopted, then a single development proposal could exceed the entire development plan floorspace projection in some towns without the need for a retail impact assessment.
- 5.43 Proposals that significantly exceed the floorspace projections are likely to significantly reduce the turnover of existing floorspace, and this impact should be carefully tested on a case by case basis.
- 5.44 The 2009 study did not consider locally set floorspace thresholds for retail development outside of town centres and the UDP does not contain impact thresholds.

Approach to Setting Floorspace Thresholds in Calderdale Borough

- 5.45 NLP advises that the wording in future development plan policy reflects Paragraphs 24 to 27 of the NPPF. The purpose of setting such limits is to adopt a floorspace threshold on a centre-by-centre basis, beyond which limits there is the potential for a significant adverse impact on town centre vitality and viability.
- 5.46 Local Plan policy needs to reflect the NPPF in requiring that the sequential approach to site selection is followed, where proposed developments for main town centre uses are being considered for sites that are not in an existing centre or not in accordance with an allocation within the plan.
- 5.47 In terms of retail impact, locally set floorspace thresholds for retail development are rightly set on a centre-by-centre basis. The suggested floorspace

thresholds set out below are based on the work undertaken in this Study alongside an understanding of the retail hierarchy within the Borough. A key consideration is the quantitative assessment of retail needs and the need for new convenience and comparison floorspace within each of the defined centres.

- 5.48 The floorspace thresholds adopted should be applied to proposals for new convenience and comparison retail floorspace, extensions to existing Class A1 stores and applications to vary the range of goods permitted to be sold from existing floorspace in edge-of-centre and out-of-centre locations. It is recommended that the floorspace thresholds are also used as a guide for assessing the impact of office and leisure proposals proposed outside of town centres given that the NPPF refers specifically to retail, leisure and office development in setting out requirements of the impact test. The diverse nature of such uses means that the Council is justified in considering the justification for an impact assessment on a case by case basis.
- 5.49 We have analysed each town and district centre on two criteria, as set out below:
 - Sales density: We have divided the combined turnover (convenience and comparison in £m) of each town and district centre and divided this by the combined floorspace (convenience and comparison in sq. m gross) to give a sales density figure for each town and district centre in (£m per sq. m) and scored the centres accordingly; and
 - Health check assessment: We have analysed each town and district centre based on the outcome of the health check assessments. The analysis is based on the health check indicators in the NPPG where information is available (Paragraph: 005 / Reference ID: 2b-005-20140306 of the NPPG).
- 5.50 The analysis for the defined centre's sales density and health check assessment has been weighted equally. We have considered the size of the town and district centres and depending on the analysis, each town centre has been given a locally set retail impact threshold of between 1,000 sq. m gross and 1,750 sq. m gross. Each district centre has been given a locally set retail impact threshold of between 250 sq. m gross and 500 sq. m gross.
- 5.51 Table 5.3 below provides a summary of NLP's proposed retail impact assessment locally set thresholds.

Centre	Retail Proposals (sq. m gross)	
Halifax	N/A – Default threshold as per Para 26 of the NPPF	
Elland, Sowerby Bridge and Todmorden	1,750	
Brighouse and Hebden Bridge	1,500	
King Cross, Mytholmroyd and Ripponden	500	
Bailiff Bridge, Hipperholme, Northowram, Queens Road and West Vale ¹¹	250	

Table 5.3 Summary of NLP's Proposed Retail Impact Assessment Locally Set Thresholds

- 5.52 Halifax town centre is significantly larger than the other town and district centres in the Borough with a combined turnover far greater than the other defined centres. Our health check assessment of Halifax has found that the town centre is performing well and is not vulnerable to development outside of the town centre. There are no retail commitments close to the Halifax town centre boundary. For these reasons, we have not proposed that Halifax has a locally set retail impact threshold for development proposals outside of the town centre boundary.
- 5.53 Any such proposals should be subject to the impact threshold of Para 26 of the NPPF, which is 2,500 sq. m gross if there is no locally set threshold.

Application of Impact Thresholds

5.54 It is for retail impact assessments submitted as part of any planning application to define an appropriate catchment area, or other submission material in the absence of a RIA. The catchment area will dictate the centres that should be considered in the context of the sequential approach and impact tests. Where a catchment area extends across a number of centres, the need or otherwise for an impact assessment must have regard to the thresholds for each centre.

Review of Major Development Opportunities

- 5.55 We have reviewed the major development opportunities contained in the adopted UDP (2006). The following sites have been considered:
 - Broad Street, Halifax;
 - Transco Site, Mulcture Hall Road, Halifax;
 - Dewsbury Road, Elland; and
 - Sugden's Mill and Site on Mill Royd Street, Brighouse.
- 5.56 This review is set out in full in **Appendix 6** and is based on the development proposed for each site in the adopted UDP (2006).
- 5.57 A summary of the findings is set out in Table 5.3 below.

¹¹ If Council officers agree with our advice and downgrade Bailiff Bridge and Northowram to local centres, then we suggest that a locally set threshold is not set for these two centres

Town/District Centre	Site	Development Prospects
Halifax	Broad Street	N/A – development complete
	Transco Site, Mulcture Hall Road	Reasonable
Brighouse	Sugden's Mill and Site on Mill Royd Street	Poor
Elland	Dewsbury Road	Poor

Table 5.4	Development Prospects of Major Development Opportunities in UDP based on NLP		
	Judgement		

Additional Sites

5.58

The NLP Assessment is restricted to the Major Development Opportunities identified in the adopted UDP – no other sites were identified during our site visits. Halifax is the largest centre in the Borough and should be the principal focus for large-format retail and other town centre uses intended to serve a broad catchment area. The other defined town centres should perform a complementary role in meeting a broad range of convenience and comparison shopping needs amongst local residents and equally a focus for new development coming forward. Development in defined district centres should be appropriate in context with meeting local, day-to-day shopping needs.

5.59 This assessment is based on the town centre first approach as set out in the NPPF. Any edge or out-of-centre proposed retail developments should be subject to the sequential and impact tests as set out in Paras 24 and 26 of the NPPF. If the defined town and district centres cannot accommodate their floorspace projections, then the Council could seek to allocate sites elsewhere within the Borough to accommodate the long term projections.

Review of Boundaries

- 5.60 We have reviewed the existing town centre boundaries (TCBs), primary shopping frontages, secondary shopping frontages and tertiary shopping frontages for the town and district centres in the Borough, as defined on the UDP (2006) Proposals Map.
- 5.61 We have proposed a revised TCB, a primary shopping area (PSA) and revised primary and secondary frontages for the defined town centres. The district centres are relatively small and on this basis, we have revised the TCB for the district centres only. These proposed boundaries are based on the definitions set out in Annex 2: Glossary of the NPPF and shown on the plans at **Appendix 7**.
- 5.62 The distinction between the PSA and the TCB provides guidance on the appropriate location for different town centre uses, i.e. retail uses should first be directed to the PSA, while other town centre uses such as offices, hotels and leisure can be located within the wider town centre area i.e. the area between the PSA and the town centre boundary. We have taken a consistent stance in reviewing the boundaries for each centre. We have excluded areas that are clearly no longer functioning as part of the town centre.

5.63 Tertiary frontages were included previously for peripheral areas of Halifax town centre as set out on the UDP (2006) Proposals Map. We have chosen to include primary and secondary frontages only for Halifax and have recommended removal of all tertiary frontages. This is because only primary and secondary frontages are defined within Annex 2: Glossary of the NPPF. The retail units shown previously as being part of tertiary frontages generally have poor quality frontages and it is considered unnecessary to distinguish between these areas and other peripheral areas of the town centre.

Food Deserts Analysis

- A food deserts map is shown at **Appendix 8**. This map highlights the areas of higher population density within Calderdale Borough. Also shown are the foodstores within the Borough and they have been given a distance ring which is size dependent and which shows their approximate catchment area. The aim of this analysis is to highlight any areas of higher population density within Calderdale Borough which are not served by a foodstore.
- 5.65 In general, the areas of the Borough with a higher population density are well served by foodstores. Unsurprisingly, the Halifax area is particularly well served by a large number of foodstores, as are the more urban areas to the east of the Borough, i.e. those closest to Bradford and Huddersfield. The more rural areas towards the central or western areas of the Borough including Ripponden, Mytholmroyd, Hebden Bridge and Todmorden, tend to be served by a single smaller-sized foodstore (aside from Todmorden which is also served by a medium sized foodstore).
- 5.66 There are some areas of higher population density that are not covered by the immediate catchment of a foodstore (based on NLP's judgement). These include:
 - Northowram District Centre, although there is a medium sized foodstore to the north east of the centre;
 - The area to the north west of West Vale District Centre;
 - The Luddenden area to the east of Mytholmroyd District Centre; and
 - The area to the north west of Todmorden, on the Calderdale / Burnley border.

6.0 **Conclusions and Recommendations**

Introduction

6.1 This report provides a Borough wide needs assessment for retail and leisure development in Calderdale Borough. The principal conclusions of the analysis contained within this study are summarised below.

Meeting Shopping Needs in Calderdale Borough

- 6.2 The NPPF states that local planning authorities should assess the quantitative and qualitative needs for land or floorspace for retail development over the plan period, up to 2031.
- 6.3 When planning for growth in their town centres, local planning authorities should allocate a range of suitable sites to meet the scale and type of retail development needed. It is important that the needs for retail and other main town centre uses are met in full and not compromised by limited site availability.
- 6.4 Long term forecasts up to and beyond 2031 may be more susceptible to change, due to unforeseen circumstances and not least the impact of development within surrounding authorities. Long term projections should be monitored and kept under review. The implications of major retail development within and surrounding the Borough should be monitored along with the effect proposals may have on the demand for additional development in Calderdale Borough.
- 6.5 Table 6.1 below summarises the floorspace capacity projections to 2031.

Area	Convenience	Comparison	Total
Halifax	-	11,351	11,351
Brighouse	868	486	1,354
Elland	657	620	1,277
Hebden Bridge	28	298	326
Sowerby Bridge	454	377	831
Todmorden	690	322	1,012
District Centres	267	1,313	1,580
Total	2,964	14,767	17,731

Table 6.1 Summary of Floorspace Capacity Projections to 2031 (sq. m net)

Source: Table 10 and Table 17 in Appendix 4

6.6 In total, the capacity for additional convenience and comparison floorspace is 17,731 sq. m net. It is reasonable to expect that a proportion of this capacity will be accommodated by vacant floorspace returning to active use but it is likely that the great majority will be accommodated in new floorspace.

6.7 The commercial leisure assessment suggests that there is a qualitative need for restaurants in Elland, a bingo hall to the west of the Borough and 'boutique

bowling' in the Borough. There is no identified qualitative need for other leisure facilities in the Borough over the plan period, including cinemas, theatres, health and fitness clubs, ten-pin bowling and bingo halls.

Strategy Recommendations

6.8 Development that serves more than a local catchment area should be concentrated in Halifax town centre first and foremost. Halifax aside, centres will provide for local needs.

Locally Set Retail Impact Threshold

- 6.9 Retail and other main town centre use developments located outside the town and local centres should be required to prepare a retail impact assessment if they exceed the following suggested thresholds for the centres:
 - NPPF default threshold as per Para 26 of the NPPF for Halifax;
 - 1,750 sq. m gross for Elland, Sowerby Bridge and Todmorden;
 - 1,500 sq. m gross for Brighouse and Hebden Bridge;
 - 500 sq. m gross for King Cross, Mytholmroyd and Ripponden; and
 - 250 sq. m gross for Bailiff Bridge, Hipperholme, Northowram, Queens Road and West Vale.

Centre Definitions and Boundaries

- 6.10 It is recommended that Bailiff Bridge and Northowram be defined as local centres in Calderdale Borough.
- 6.11 Future development plan policies should continue to define separate Town Centre Boundaries (TCBs) and Primary Shopping Areas (PSAs) for Halifax, Brighouse, Elland, Hebden Bridge, Sowerby Bridge and Todmorden. A separate Primary Shopping Area is necessary for applying the sequential approach for Class A1 retail uses.
- 6.12 Suggested changes to the TCBs and PSAs for all the town and district centres are outlined in **Appendix 7**.
- 6.13 The development plans should distinguish between primary and secondary frontages in Halifax, Brighouse, Elland, Hebden Bridge, Sowerby Bridge and Todmorden.

Retail Capacity

6.14 The floorspace capacity projection is around 11,351 sq. m net of additional retail floorspace in Halifax up to 2031; all of which is comparison retail floorspace. The focus should clearly be on allocating sites to accommodate the long-term need for comparison floorspace. The Transco site, Mulcture Hall Road, Halifax, could accommodate approximately 1,050 sq. m net of the retail capacity within Halifax.

- 6.15 The Halifax Business Improvement District (BID) will assist in bringing together businesses and organisations to collaborate on initiatives that improve the location where they trade or do business. BIDs are driven by participating businesses who work together to draw up a business plan which is voted on, and if agreed, is then funded through a levy based on business rateable values, as well as trying to lever in additional funding where possible for investment into the delivery of projects for the benefit of businesses. The Halifax BID covers much of the town centre. This has now progressed as it has been voted on and is now in place. The Halifax BID will assist in delivering the capacity identified for additional comparison retail floorspace as identified by this retail capacity study.
- 6.16 The floorspace capacity projection is around 335 sq. m net of additional retail floorspace in Brighouse up to 2031; of which 254 sq. m net is convenience retail floorspace and 81 sq. m net is comparison retail floorspace. If the retail commitment in Brighouse is delivered, then this will partly address the quantitative need for convenience and comparison goods floorspace. Alternatively, if the Sugden's Mill and site on Mill Royd Street, Brighouse, comes forward for re-development, then this could deliver 4,800 sq. m net retail floorspace.
- 6.17 The floorspace capacity projection is around 1,277 sq. m net of additional retail floorspace in Elland up to 2031; of which 657 sq. m net is convenience retail floorspace and 620 sq. m net is comparison retail floorspace. A small to medium sized foodstore would assist in meeting this quantitative need for convenience goods floorspace. The capacity in the comparison goods sector is enough to accommodate one medium sized comparison goods unit or a number of smaller sized units. Some of this capacity for additional retail floorspace within Elland could be accommodated by the delivery of the site on Dewsbury Road, Elland.
- 6.18 There is capacity for just 28 sq. m net additional convenience retail floorspace in Hebden Bridge in the long term up to 2031. In the comparison goods sector, there is capacity for just 298 sq. m net in Hebden Bridge up to 2031. The commitment for a retail floorspace as part of a mixed use development (including hotel floorspace) would accommodate some of the comparison goods retail capacity.
- 6.19 The floorspace capacity projection is around 831 sq. m net of additional retail floorspace in Sowerby Bridge in the long term up to 2031; of which 454 sq. m net is convenience retail floorspace and 377 sq. m net is comparison retail floorspace. The capacity in the convenience goods sector enough to accommodate up to two convenience retail units such as a Co-op, Sainsbury's Local or Tesco Express, whereas an additional the capacity in the comparison retail sector would support a small to medium sized comparison goods retail unit or a number of smaller units.
- 6.20 The floorspace capacity projection is around 1,012 sq. m net of additional retail floorspace in Todmorden in the long term up to 2031; of which 690 sq. m net is convenience retail floorspace and 322 sq. m net is comparison retail

floorspace. There are two retail commitments at the site of the Abraham Ormerod Hospital and former cinema on Burnley Road (Aldi is the named operator) and at land on Hope Street (Lidl is the named operator of the foodstore and there is also an additional retail unit), which would address all of the capacity identified.

- 6.21 Capacity for convenience goods floorspace up to 2031, on a composite basis, is 2,964 sq. m net, for the Borough as a whole. Based on NLP's assumptions made in this report, there is 2,748 sq. m net committed convenience goods floorspace. Thus, if all retail commitments are delivered, then almost all the capacity for convenience goods floorspace will be taken up.
- 6.22 It should be noted that there is no guarantee that all commitments will come forward and this may generate additional capacity in the Borough.
- 6.23 From a development management perspective, 'need' is no longer a retail test in the NPPF. As set out in Paras 24 and 26 of the NPPF, there are just two retail tests that retail proposals should be considered against, i.e. the sequential and impact tests. Of course, the decision maker would need to assess retail proposals against relevant local retail policies in the current development plan and consider all relevant material considerations.

Implementation and Monitoring

- 6.24 There are a number of broad areas of possible action the Council could pursue in order to maintain and enhance the role of shopping centres within the Borough, as follows:
 - application of guidance within the NPPF, particularly relating to the sequential approach and impact tests for locally set thresholds in determining out-of-centre retail and other development proposals that generate significant numbers of trips;
 - seeking to improve the range and choice of shops and services in all centres (where appropriate in terms of scale) by encouraging intensification, development and the re-occupation of vacant premises, and continuing to promote the centres;
 - maintaining the generally high quality environment within each centre; and
 - bring forward development opportunities through the Local Plan process to improve the availability of modern premises suitable for new occupiers.
- 6.25 The recommendations and projections within this study are expected to assist the Council in reviewing development plan policies and to assist development control decisions. The study provides a broad overview of the potential need for further retail development up to 2021, 2026 and with longer term forecasts up to 2031. Projections are subject to uncertainty and forecasts may need to be amended to reflect emerging changes as and when new information becomes available, in particular longer-term projections up to 2031 should be treated with caution.

6.26 Projections should be monitored and the floorspace projections rolled forward. The following key assumptions should be updated as necessary:

- population projections;
- local expenditure estimates (information from Experian or other recognised data providers);
- growth rate assumptions for expenditure per capita (information from Experian or other recognised data providers);
- the impact of potential increases in home and internet shopping (Experian regularly provides projections for internet shopping and these projections will need to be updated at the same time as expenditure and population figures);
- existing retail floorspace and average turnover to floorspace densities;
 and
- implemented development within and around the study area.
- 6.27 These key inputs into the retail capacity assessment can be amended to provide revised capacity projections.



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