

West Cumbria Retail, Town Centres and Leisure Study

on behalf of Copeland and Allerdale Councils

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1.0 Introduction

Introduction

- 1.1 Nexus Planning was jointly commissioned by Allerdale and Copeland Councils in January 2020 to undertake a Retail, Town Centres and Leisure Study for the West Cumbria region. One of the key purposes of the Study is to act as the evidence base to assist in the formulation of future development plan policy and land use allocations, as well as providing baseline information to assist in the determination of planning applications for retail and leisure development.
- 1.2 In addition to the above, this Study will specifically be used to inform policy in the emerging Copeland Local Plan and will assist the Council in finalising the policies in particular relating to retail and town centre matters and will assist Allerdale Council in updating its evidence base for future policy.
- 1.3 It is important to note that this Study was undertaken at a time pre-COVID-19 and all of the market research was carried out prior to the country being put on 'lockdown'. As such, high streets across West Cumbria were fully operational and residents were undertaking 'normal' shopping trips. Whilst the findings therefore represent the state of play at the time of the market research and we envisage that some, if not all of the residents' shopping habits will return eventually, there will inevitably be some changes to the high streets and town centres in West Cumbria as a result of COVID. However, the precise impacts of the current situation are difficult to predict and therefore it may be important to revisit some of the findings of the Study once centres have been open and trading again in the short to medium term.
- 1.4 In this regard, the Grimsey Review entitled 'Build Back Better' was published in June 2020 which requests for a call to action to encourage the recovery of town centres, remove barriers to progress and facilitate change quickly. The report states that all parts of the economy will need to change and that to enable unique places to emerge embracing the 'new normal', it will be incumbent on the Government to remove some of the restrictions of the past, and put in place devolved powers that enable local communities to act.
- 1.5 This will require:

1. **Localism** – a shift in power away from national government and a renewed focus on localism in order to empower local people to redesign their highstreets and have their say on businesses, services and amenities.
 2. **Leadership** – local leaders with dynamic and collaborative skills willing to embrace change to build back better.
 3. **Fewer cars, more green space** – fewer spaces designed solely around cars and expansion of green space, parks and town squares.
- 1.6 In addition to the above, a number of towns across the UK have been shortlisted to receive part of the Future High Streets Fund allocated by the Government to help develop plans to reinvent high streets. The scheme was launched in December 2018 and is a key part of the Government’s plan to renew and reshape town centres and high streets in a way that drives economic growth and sustainably improves living standards. The successful candidates who have progressed past the first stage are allocated up to £150,000 to support the development of detailed project proposals that can be submitted for capital funding. Within Allerdale; Maryport town centre has been successful in progressing to the second round and within Copeland, Whitehaven town centre has been successful. Additionally, Millom and Cleator Moor in Copeland and Workington in Allerdale have been invited to bid for potential funding opportunities through the Government’s Towns Fund, whilst Egremont in Copeland may be set to receive funding through the Borderlands Inclusive Growth Deal.

Objectives

- 1.7 In light of the above, the main purpose of this study is to provide a National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) compliant Retail, Town Centre and Leisure Study, which provides the Council with an up-to-date objective assessment of retail and leisure development needs, together with a clear understanding of retail and leisure provision and potential strategic responses/recommendations.
- 1.8 The study explores retail and commercial leisure need over the plan periods (to 2035 in Copeland, and to 2029 in Allerdale) and provides an up to date review of the performance of the town centres in West Cumbria. The objectives of the study are to:

- Review current retail and leisure trends and set out how we envisage these impact on provision in West Cumbria;
- Provide an assessment of the current planning policy context within West Cumbria;
- Undertake healthchecks for each of the defined centres within the two authority areas, based on the guidance set out in the Town Centres and Retail Planning Practice Guidance;
- Provide a quantitative and qualitative assessment of both retail and leisure needs within West Cumbria up to 2035;
- Identify opportunities to expand the town centre offer beyond retail to support centres' vibrancy and vitality;
- Review town centre boundaries and, as appropriate, primary shopping areas;
- Provide advice in respect of the opportunity to expand the defined centres; and
- Provide policy recommendations in respect of local impact thresholds and the diversification of centres through strategic town centre advice to both authorities.

1.9 Key contributions to the above objectives have been a number of items of new empirical research. First, we have commissioned NEMS Market Research to undertake a new shopping survey of 1,000 households. The Study Area for the survey comprises 8 zones which are based on postcode areas grouped around one or more of the existing town centres. A map showing the boundaries and location of the eight zones is shown at Appendix K.

1.10 The second area of empirical research has been in relation to the assessment of the health of the 10 defined town centres. This exercise has incorporated land use surveys of these defined centres, along with a review of health check indicators and an appraisal of the qualitative results of the household survey data.

1.11 In addition, as part of the assessment of key town centre health issues, engagement, including a workshop, has taken place with key Stakeholders in West Cumbria to obtain views on existing town centre strengths, weaknesses, opportunities and threats; potential suggested town centre improvements; and retailer/leisure provider requirements/needs.

Structure of Study

1.12 Our study is structured as follows:

- **Section 2** provides a context for the Study by summarising the current and emerging key retail and leisure trends in the UK;
- **Section 3** summarises the current national and local planning policy context for retail and leisure development issues in West Cumbria;
- **Section 4** sets out the key market research which informs the Study;
- **Section 5** sets out a summary of our healthcheck assessments, providing an overview of the vitality and viability of the principal towns and key service centres within West Cumbria;
- **Section 6** analyses population and expenditure within the Study Area.
- **Section 7** sets out the key market research findings with regard to spending patterns;
- **Section 8** provides our assessment of the need for further convenience and comparison goods retail floorspace over the assessment period;
- **Section 9** sets out our assessment of the need for further commercial leisure floorspace over the assessment period;
- **Section 10** provides a summary of the out-of-centre floorspace within West Cumbria; and
- **Section 11** summarises our key findings and sets out our recommendations.

2.0 Current Retail and Leisure Trends

Introduction

- 2.1 In order to provide a context for this Study and help identify the sectors that are more likely to be the subject of additional development proposals, we provide an overview of current retail and leisure trends at Appendix A.
- 2.2 We provide a summary below in respect of the current state of the economy:

Convenience Goods Retailing

- Recent socio-economic conditions have led to significant shifts in convenience goods retailing, which have resulted in the 'big four' supermarket operators' market share being cut. Mintel¹ finds that the decline of the food superstore is well established and that this can be attributed to two issues.
- Firstly, people are undertaking food shopping in different ways. More people are living in town and city centres and more people are having difficulties financing the purchase of their own home. Mintel indicates that such people are more likely to undertake food shopping on a 'as needs' basis and are more likely to eat out or use takeaways. As such, they are less likely to have need to undertake a 'main food shop'.
- Secondly, the current uncertainty in the economy has made hard discounters (namely Aldi and Lidl) a more attractive proposition and are particularly thriving given that shoppers are currently having to be 'money savvy'. Discounters have also made efforts to try to compete more directly with the 'big four' supermarket operators, with larger stores, greater ranges, fresh foods and premium products becoming increasingly prevalent. When analysing the performance of Aldi, Retail Economics² notes that it has '**attacked the heartland of UK grocery**' by undercutting the 'big four' with highly competitive prices and investing in more high quality

¹ 'UK Retail Rankings', Mintel, April 2018

² 'UK Food and Grocery', Retail Economics, September 2015

premium produce. In a similar way, Lidl has also adopted an aggressive growth programme relating to its pricing, produce offer and store openings since 2013.

Comparison Goods Retailing

- The comparison goods sector is currently being squeezed by a number of factors, including reduced expenditure growth, the ability of internet shopping to plug gaps in retailer representation, increases in the minimum wage, and business rates changes. This 'perfect storm' has resulted in changes in the structure of retailing on the UK high street and a generally lesser reliance on comparison goods retail.
- Whilst such structural changes have had a material impact on the vitality and viability of many UK high streets, there are some beneficiaries. In particular, household discount operators, such as B&M Bargains, Poundland and Wilko, have reoccupied a number of medium to large retail units. However, as evidenced by the recent failure of Poundworld, there is some evidence that this market may be approaching capacity.

Online Retailing

- The ongoing popularity of internet shopping continues to have clear implications in respect of the viability of some 'bricks and mortar' retailers. However, it is important to note that changes in how people shop also bring about opportunities for retailers trading from the high street. In particular, many stores sell online but fulfil orders from regular stores rather than warehouses³, with purchases therefore helping to sustain tangible retail floorspace. As a consequence, Experian also provides an 'adjusted' estimate of special forms of trading, which relates to expenditure which is not available to actual stores.

Commercial Leisure

- One of the recent high street success stories has been the resurgence of the town centre leisure sector, which has been focussed around new cinemas⁴ close to the shopping core and, increasingly, a revived markets provision. Leisure operators have become increasingly prevalent

³ This is particularly the case with food shopping and speciality comparison goods purchases, where retailers often try to tap into a wider market through an online presence

⁴ Which have been delivered in towns such as Bury, Oldham, Preston and Stockport

in a number of centres as a means of bringing some vacant units back into an active use. Town centre cinema development has successfully underpinned wider mixed-use developments, as food and drink operators are typically keen to locate in close proximity to benefit from spin-off custom.

- 2.3 We provide below a summary of the implications of the current retail and leisure trends on the centres of Allerdale and Copeland.

Implications for Allerdale and Copeland Authority Areas

- 2.4 The above trends and those set out in detail at Appendix A have a number of potential implications for retail and leisure provision within Allerdale and Copeland. Workington town centre is the principal retail and leisure centre within West Cumbria with the highest level of national multiples present. As we demonstrate in more detail later in the report, the centre still attracts the highest proportion of convenience and comparison shopping trips from residents in West Cumbria and has retained its importance as a commercial destination within the wider area. This is particularly the case given the relatively rural nature of West Cumbria and the importance of ensuring that there is a principal centre within the region which provides for the range of operators residents require. Whitehaven is also undoubtedly an important town centre serving residents, tourists and transient worker's needs. The centre's offer is dominated by its convenience provision and wider leisure and service offer but it also an important destination to serve shoppers comparison needs. In this regard, Whitehaven does not accommodate the range of national multiple comparison operators present in Workington but there is an opportunity to increase the provision dependent on the market demand, particularly given Workington's proximity.
- 2.5 The other alternative is for residents to look online to meet their shopping needs, which of course is partly to the detriment of defined centres (albeit there will be an element of 'click and collect' and other means which can encourage linked-trips to centres). Workington is also well served by large format convenience destinations meeting both main and top-up food shopping functions and attract residents from a relatively large catchment, particularly from those areas within which larger stores are not present. This in itself raises sustainability concerns in terms of the distances required by residents to travel to meet their needs but which is not unusual for areas similar to West Cumbria. Furthermore, and as is the case for comparison retailing, residents are becoming more familiar with

- shopping online, which again has been accelerated as a result of COVID-19. It will be important that post-COVID, operators and centres incentivise residents back into the centres to help support the revitalisation of the high streets.
- 2.6 Despite it being Copeland's principal centre, Whitehaven town centre appears to have some difficulty attracting national multiple traders (possibly as a consequence of a greater critical mass of such operators being accommodated in Workington or due to a lack of larger units within the town centre). We believe that the strong convenience goods offer in and around Whitehaven helps to sustain the centre, and should help ensure that it has a viable role going forward. Accordingly, whilst Whitehaven is the type of centre that could come under pressure due to 'polarisation', its strong convenience and service offer appears to underpin the centre. Furthermore, Whitehaven benefits from a strong transient workforce and tourism custom, both of which can help to sustain the future of the centre and both of which must be nurtured moving forward and linked to a quality leisure/visitor experience.
- 2.7 Instead, it is the smaller centres of Aspatria, Wigton, Egremont, Millom and Cleator Moor which are the subject of vacancy rates above the national average. Cleator Moor town centre does not accommodate any main food shopping provision (there is a Co-op foodstore on Leconfield Road) and, therefore, its residents frequently look towards Whitehaven to meet such needs. As a consequence, the centre appears to be struggling to establish its ongoing role and, at present, appears to be struggling somewhat. However, Aspatria, whilst containing a key convenience national multiple, is struggling to retain or indeed attract any new operators. Millom stands out from the other smaller centres as it suffers from additional and unique challenges in addition to the above trends due to its isolated location, albeit Millom retains a strong anchor store and secondary convenience offer. As such, the central goal here will be to ensure the renovation and reuse of units to ensure that residents of Millom do not begin to travel elsewhere, such as Barrow-in-Furness, to meet their convenience and comparison goods shopping needs. We return to these matters in the health check assessments at Section 5.
- 2.8 Somewhat surprisingly given the national picture, the Lidl store at Whitehaven closed at the end of 2013. We understand that the store was not considered to be of an appropriate format to meet the catchment's needs. Whilst a new Lidl has subsequently opened at Maryport, and a second has gained planning permission in Workington, no replacement site or store has come forward in Copeland.

- 2.9 Whilst the growth of online retailing is likely to have had a detrimental impact on the turnover of West Cumbria's retail destinations, going forward there may be opportunities for West Cumbria's retail facilities to benefit from multi-channel retailing in order to help drive footfall and sustain retailer representation. This is particularly important in light of the current commercial situation and the need to rejuvenate high streets once the pandemic is over. Working with bodies such as the Institute of Place Management to plan for a successful recovery will be vital following the current commercial climate, and will likely be a relatively lengthy process as we get used to being back to 'normal'.
- 2.10 The immediate and direct implications of the outbreak have been two-fold, both resulting in reduced demand in the short term. Firstly, the necessary social distancing measures impact customer access and interactions within stores, restaurants and other high street facilities. Additionally, and more significantly in the long-term, the reduction of an office based-workforce across larger centres has led to a stark reduction in demand for high street amenities from workers. On the other hand, this has led to increased 'hyperlocalism', as home workers frequent local high streets instead of facilities focussed around a commute.
- 2.11 Alongside this we can also point to an increase in community cohesion and partnerships amongst high street occupiers, as well as between high streets and local residents. In a number of cases, high street operators have adapted to the COVID-19 outbreak by pivoting to an online model (which will likely remain as an additional revenue stream for a number of businesses in the future) and increased communication of opening hours and operating procedures. This has led to new level of customer interaction for some high street occupiers, while others have understandably reduced communication whilst focussing on other priorities during the outbreak. Many businesses are also diversifying their offer and adding, often informal, home delivery services.
- 2.12 Such opportunities will likely be driven in the first instance by national multiple retailers – and are therefore of particular relevance to larger retail venues, such as Workington and Whitehaven town centres and to a lesser extent the likes of Cockermouth and Maryport – but there are also likely to be opportunities for smaller centres to provide click and collect facilities, which could help encourage residents to visit the centres and access other facilities whilst they do so.
- 2.13 There is a need for flexibility in centres, which needs to be adaptable to a number of uses to address a wide range of future needs. This is ever important following the COVID-19 pandemic and as we

witness the 'recovery' within the centres and high streets in West Cumbria. Indeed, vital and viable centres need a varied mix of uses and there is also an identified need to concentrate multi-functional public services in town centre locations to realise agglomeration benefits.

- 2.14 The latest pressures on our high streets will likely affect demand for space and its use, the design of buildings and public realm, and transport access. Indeed, the changes in working habits will likely impact on the way we live longer-term, resulting in a need for residents to shop and work locally, and enjoy the local services and leisure activities. In this regard, the sub-regional centres have struggled more during the relaxing of the lockdown measures given that a higher proportion of workers are still working from home and making the most of facilities within the smaller local town centres. This may result in a decrease in retail space overall, a trend which has been witnessed in West Cumbria's centres pre-COVID in any event. In this regard, we recommend that both authorities ensure that policies are sufficiently flexible so as to allow for a wide range of town centre uses beyond retail, and that consideration is given to repurposing historic, often outdated retail stock to accommodate residential, leisure and community uses.

3.0 Planning Policy and Legislative Context

Introduction

3.1 In order to shape the direction of this Study, it is helpful to understand relevant retail and town centre planning policy at a national and local level. As such, we first summarise national planning policy of relevance before briefly considering relevant development plan policy as set out in both the local plan for Allerdale Borough Council and Copeland Council. For Allerdale Borough Council this includes:

- The Allerdale Local Plan (2014) (Part 1); and
- The Allerdale Local Plan (Part 2) (2020).

3.2 For Copeland Council the relevant development plan policy includes:

- the Copeland Local Plan 2013-2028: Core Strategy and Development Management Policies (2013);
- the Copeland Local Plan (2006) saved policies; and,
- the emerging, Draft Copeland Local Plan 2017-2035, Issues and Options Draft (2019).

3.3 This section provides an overview of key policies that are pertinent to retail and town centre matters. A more detailed review of relevant national and local policy is provided at Appendix B.

The Revised National Planning Policy Framework

3.4 The revised National Planning Policy Framework ('NPPF'), which was published on 24 July 2018 and subsequently updated on 19 February 2019, recognises that a flexible approach will be necessary to provide for the future vitality and viability of town centres. The revised NPPF reflects the fact that the traditional role of town centres has been undermined by structural changes in the sector, and that there may be a need to plan for a more diverse range of uses going forward.

3.5 Paragraph 80 of the NPPF indicates that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

- 3.6 Paragraph 85 specifically relates to planning for town centres and requires that plans meet needs across a minimum ten-year period. Paragraph 89 of the NPPF states that it is appropriate to identify thresholds for the scale of edge of centre and out of centre retail and leisure development that should be the subject of an impact assessment. Any such threshold policy applies only to the impact test (all planning applications for main town centre uses that are not in an existing centre and not in accordance with an up-to-date development plan will generally be the subject of the sequential test⁵).

Ensuring the Vitality of Town Centres Planning Practice Guidance

- 3.7 The Ensuring the Vitality of Town Centres Planning Practice Guidance ('the Town Centres PPG') was published in July 2019 and is in place to provide additional direction in respect of how retail and town centre planning policy should be applied in respect of plan-making and decision taking. The Town Centres PPG affirms the Government's aspiration to support town centres in order to generate employment, promote beneficial competition and create attractive, diverse places where people want to live, work and visit. The detail of what is set out in the Town Centres PPG can be found at Appendix B.

Changes to Permitted Development Rights

- 3.8 On 15 April 2015, the Town and Country Planning (General Permitted Development) (England) Order came into force⁶. The Order consolidates and replaces the Town and Country Planning (General Permitted Development) Order 2015 (and its subsequent amendments), and provides additional permitted development rights.
- 3.9 In addition to the above, the Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016 subsequently came into force on 6 April 2016.
- 3.10 The above provisions seek to make it more straightforward to secure the reuse of buildings (and thereby reduce the amount of vacant property).

⁵ With the exception (in accordance with paragraph 88 of the NPPF) of small scale rural office proposals and other small scale rural development.

⁶ http://www.legislation.gov.uk/uksi/2015/596/pdfs/ukxi_20150596_en.pdf

Permitted Development Rights

- 3.11 On the 23rd March 2020, the UK Government announced a 'lockdown' of society to adjust to the outbreak of the Coronavirus (Covid-19), which dictated that persons should not leave their dwellings unless conducting essential work, grocery shopping or collecting medication.
- 3.12 As such, the UK Planning System is going through a period of transition in response to the Covid-19. At the time of writing, planning regulations in England are to be relaxed so that pubs and restaurants can operate as hot food takeaways, which has necessitated a temporary change to permitted development rights through The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2020. We provide a summary of the changes at Appendix C.

Allerdale Planning Policy Context

- 3.13 The Allerdale Local Plan (Part 1) Strategic and Development Management Policies was adopted in 2014 and replaced the majority of policies within the Allerdale Local Plan 1999. The plan will guide development up to 2029. The main retail and town centre policies of relevance with the Allerdale Local Plan are as follows:
- 3.14 Strategic Policy S16 concerning aspects of the Town Centre and Retail outlines that the council will promote the vitality and viability of town centres, by expecting main town centre uses to be located within existing centres. It outlines the hierarchy of centres, with Workington designated as the Principal Centre, and Key Service Centres following those appraised as part of this study.
- 3.15 Policy S17 which previously regarded tourism, coastal and countryside recreation has been replaced by Policy SA32 within the Local Plan Part 2.

Allerdale Local Plan (Part 2)

- 3.16 The Allerdale Local Plan (Part 2) regarding Site Allocations replaces the remaining saved policies of the Allerdale Local Plan 1999. The Draft Local Plan (Part 2) was submitted to the Secretary of State for independent examination in January 2019. Hearings were undertaken in May 2019 and the government's Planning Inspector issued their final report and recommended modifications on 9th January 2020. The Local Plan Part 2 was formally adopted on 22nd July 2020.

- 3.17 The Local Plan Part 2 makes two site allocations for town centre retail use; SA47 allocates Central Car Park, in Workington and SA48 allocates the Royal British Legion site in Workington. Policy SA46 regarding retail and town centres safeguards these allocated sites for main town centre uses and uses which will support and enhance the vitality and viability of the town centre throughout the plan period. This policy encourages retail-led schemes.

Copeland Planning Policy Context

- 3.18 The Copeland Local Plan Development Management Policies Development Plan Document was adopted in 2013 and guides development in the area up to 2028.
- 3.19 Policy ER7 relates to the roles and function of the Principal Town Centre, Key Service Centres and Local Centres. It outlines that development will be required to meet the needs of the area, be of an appropriate scale to the centre and not adversely impact the vitality or viability of other nearby centres.
- 3.20 Policy ER8 concerns Whitehaven Town Centre and outlines that development which responds to, consolidates, improves, enhances, diversifies and integrates Whitehaven will be supported.
- 3.21 Policy ER9 relates to the Key Service Centres as well as Local and other smaller Centres. This policy states that retail and service development which promotes the vitality and viability of these centres, and is consistent with the spatial development strategy, will be supported.
- 3.22 Part B states that the provision of shops and services will be maintained to ensure they continue to serve their small catchment areas with basic goods and services. It goes on to state that retail and service development which promotes the vitality and viability of rural settlements, without damaging their environment or amenity, will be supported.

Emerging Local Plan

- 3.23 The Council are currently working on the production of a new Local Plan which will concern strategic policies, site allocations and development management policies up to 2035. The first Issues and Options Draft was consulted on between 25th November 2019 and 20th January 2020. The Council will publish a Preferred Options Draft in late September 2020, subject to full Council approval.

4.0 Market Research: In-Street and Business Surveys

In-Street Surveys

- 4.1 In-street surveys were undertaken in the centres of Workington and Whitehaven by NEMS in February 2020, in order to understand how each centre is used and identify those aspects of the centre that may benefit from improvement and change. The results of the in-street surveys are invaluable to formulating the future strategies for both Whitehaven and Workington town centres and pull together not only residents' views but also those views of tourists visiting the two centres.
- 4.2 In total, 100 surveys were undertaken in Workington and 100 surveys in Whitehaven. Within the centres, the surveys were undertaken at various locations to ensure that the results picked up a range of responses and that they were reflective of a broad array of visitors to the centre.
- 4.3 The survey gives insight into the following aspects of Workington and Whitehaven:
- Purpose of the Visit and Shopping Intentions;
 - Frequency of the Visit;
 - Travel and Car Parking;
 - Likes and Dislikes regarding the Centre;
 - Suggested Improvements to the Centres; and
 - What Workington and Whitehaven do better than other places.
- 4.4 The full tabulated in-street survey results are provided at Appendix D. We set out an overview of the key findings of the survey with the summary report appended to this document in appendix M, focusing on customer satisfaction ratings, customer behaviour and suggestions for improvement.

Business Surveys

- 4.5 A business survey was sent out to all existing businesses within the 10 defined centres in West Cumbria, in order to understand how each centre is used and identify those aspects of the centre that may benefit from improvement and change.

- 4.6 The survey sought to establish the views of local businesses as part of the wider health check of the centres. The aim of the survey was to help inform the Councils future strategy and how it considered future development proposals for retail, town centre and leisure uses.
- 4.7 The survey was live from 25th February 2020 until 16th March 2020. We also promoted the business survey through local stakeholders, the Council's social media channels and via word of mouth.
- 4.8 We set out below a brief summary of the findings from the business survey. A copy of the questionnaire is included at Appendix E.
- 4.9 A Business Survey summary has been produced and appended to this study, which analyses the key trends and findings for each centre in full. A copy of the Business Survey summary is included at Appendix N.

Contextual Findings

- 4.10 With regard to business performance, 47.6% of respondent's state that their business is performing moderately, whilst 38.09% state that their business is performing Well or Very Well.
- 4.11 In addition to enquiries regarding the type of growth each business has experienced since they began trading, and the current performance of businesses, the survey asked respondents to rate several aspects of the town centre they were based within such as:
- Accessibility;
 - Business Offer;
 - Public Realm and Environment; and
 - Centre Safety/Security.
- 4.12 This indicates several aspects for improvement with regard to accessibility, offer, public realm, and safety/security. A full, centre-by-centre analysis with regard to each of the above aspects is provided within the Business Survey summary (Appendix N).

Key Findings

4.13 There are a number of key findings from the survey with regard to town centre, retail and leisure uses which are important to highlight.

- Of those respondents with businesses in Whitehaven, more than 63% consider people who work in Whitehaven throughout the week but are not permanent residents to have appreciable benefits for their business such as an increase in the number of customers and amount of spending.
- Of those respondents with businesses in Workington town centre, 80% believe people who do not live in the town permanently, but work in the centre between Monday and Friday, to have appreciable benefits for their business such as an increase in the number of customers and amount of spending.
- 50.0% of respondents across West Cumbria would be interested in joining a Business Group or Forum. Of those respondents with businesses located in Workington, 40% would be interested in joining a Business Group or Forum, whilst 55% of respondents with businesses located in Whitehaven would be interested in joining such a group.
- With regard to non-retail uses in Workington, 40% of respondents consider there to be a good balance of non-retail uses, however 60% consider there to be too-many non-retail uses.
- In Whitehaven, 63.64% of respondents consider there to be too many non-retail uses, citing too many empty premises and take-away services.

Priorities for the future

4.14 The survey asked respondents their priorities with regard to several improvement measures that they may like to see within the town centres, including:

- New uses and development;
- Transport; and
- Environmental and aesthetic measures.

- 4.15 The survey also enquired into the main barriers that businesses within the region face with regard to Transport, the general environment, competition and general commercial barriers. This identifies the main issues for local businesses in West Cumbria which need to be addressed moving forward.
- 4.16 A full, centre-by-centre analysis regarding a number of additional town centre, retail and leisure related issues is provided within the Business Survey Report (Appendix N).

Stakeholder Workshop

- 4.17 On 25th February, a stakeholder workshop was held at Allerdale Council's Offices in Workington to obtain views of key Stakeholders from across West Cumbria and to inform the wider healthcheck of the town centres. Stakeholders invited included those from the relevant teams at both authorities along with Cumbria County Council, key stakeholders in centres such as landowners, tourist boards, business representation and town Councils.
- 4.18 The stakeholder workshop comprised of a presentation of some initial findings and interactive mapping activity, where Stakeholders had the opportunity to annotate, drawn on, sketch and flag key ideas or knowledge about the town centre. The Stakeholders in attendance, and those who could not attend on the day but still wished to provide feedback, were asked to fill in a Town Centre Stakeholder Questionnaire.
- 4.19 The questionnaire asked Stakeholders to provide insight regarding the following:
- i. The principal strengths of the town centre;
 - ii. The principal weaknesses of the town centre;
 - iii. How the performance of the town centre has altered over the past 5 years;
 - iv. Their opinions regarding the mix of uses in the centre;
 - v. Their views regarding the accessibility of the town centre;
 - vi. The Opportunities in the town centre; and
 - vii. The biggest challenges/threats to the town centre.
- 4.20 The key findings of the Stakeholder Workshop, with regard to the two principal town centres of Whitehaven in Copeland Council and Workington in Allerdale Council are as follows:

- The Stakeholders considered Workington’s principal weaknesses to be the connectivity of the town, citing Washington Street as a barrier between restaurants and the retail centre at Washington Square. Furthermore, pedestrian connectivity was considered a key weakness to the west of the town also due to a lack of signage from the train station.
- Stakeholders identified a number of opportunities with regard to Workington, including potential for further pedestrianisation, opportunities to create activities for young people, support skills for jobs, create linkages between the sports and leisure centre with the town centre, improvement of signage, and redevelopment of the bus station.
- Stakeholders consider the harbour in Whitehaven to be underutilised and identified a number of issues in Whitehaven including a lack of larger units, unattractive aspects of King Street, lack of demand, parking issues, and barriers to pedestrian linkages.
- Stakeholders considered the harbour to be Whitehaven’s principal strength, along with its walking distance to a range of amenities, pedestrianised zones and Georgian Architecture. As such, stakeholders considered the main opportunities to be the potential to encourage development of flats above retail units, improvement of linkages between the harbour and the primary shopping frontages, improvement to signage and wayfinding, and improvements to the townscape.

4.21 Scanned copies of the feedback maps and example questionnaires are viewable in Appendix F and a centre-by-centre summary of the findings from the stakeholder workshop can be viewed in appendix O.

5.0 Healthcheck Summary and Conclusions

Introduction

- 5.1 Paragraph 85 of the NPPF indicates that planning policies should promote the long term vitality and viability of town centres by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries. The same paragraph also states that town centres should accommodate a suitable mix of uses (including housing) and provide for development that reflects a centre's distinctive character.
- 5.2 Paragraph 002 of the Town Centres PPG indicates that the key way to set out a vision and strategy for town centres is through the development plan and (if needed) supplementary planning documents. Paragraph 006 of the Town Centres PPG identifies a range of indicators that should be assessed over time in order to establish the health of a town centre.
- 5.3 As such, comprehensive healthcheck assessments have been undertaken for the ten centres which assess these indicators, including the two principal centres and eight key service centres across West Cumbria. The detailed healthchecks of Allerdale and Copeland Councils centres are provided in Appendix G and Appendix H respectively, which also include the diversity of use plans for each of the ten centres.
- 5.4 We provide an overview of the centres position in the retail hierarchy below, before summarising the key conclusions and recommendations resulting from our healthcheck assessments.
- 5.5 Healthchecks and shopping pattern surveys undertaken as part of this project to inform the Report were undertaken prior to the systematic shift that occurred on 23rd of March, from which only essential activities (key work, grocery shopping or collecting medication) are permitted.
- 5.6 As such, the findings and recommendations of this report are based upon a pre-Covid-19 context, and will be considered in relation to the fate of the high street, retail and leisure services moving into a post-Covid-19 era.

West Cumbria's Principal Centres – Workington and Whitehaven

Workington

- 5.7 Workington is designated as a principal centre within the Allerdale Local Plan Part 1 (2014). It is the principal centre within Allerdale and the largest centre across West Cumbria. The A66 connects the town to the M6 Motorway at Penrith via the Lake District National Park. The principal centre is also well connected to 4 of the key service centres via Motorways; A595 connects the town to Carlisle via Cockermouth whilst the A596 connects Workington to Carlisle via Maryport, Aspatria and Wigton. The centre attracts the highest proportion of comparison expenditure across the region, and has the highest proportion of national multiple occupiers including a number of high street fashion operators, drawing footfall into the centre,
- 5.8 Workington is characterised by a pedestrianised town centre with a strong national comparison offer and a substantial independent leisure and retail service offer. However, it does face competition from out of centre floorspace at Dunmail Park, Derwent Drive and from the out of centre convenience floorspace, all of which attract footfall and expenditure away from the town centre. Indeed, the centre's absence of a foodstore within or on the edge of the town centre boundary is unusual for a centre of its size.
- 5.9 Washington Square Shopping Centre acts as a key commercial destination for comparison goods uses in Workington, with the centre anchored by a strong range of comparison stores such as Next, JD Sports, Home Bargains, H.Samuel, River Island, New Look and discount operators such as Poundland. Murray Road also acts as a key supplementary destination for convenience and comparison goods adjacent to Washington Square.
- 5.10 There are 90 convenience and comparison goods operators in Workington, accounting for 36% of all units and 25,340 sq.m of floorspace which equates to 49% of the total stock of commercial floorspace.
- 5.11 Convenience goods operators account for 4,240 sq.m of floorspace and equate for 8% of the total stock of commercial floorspace. This accounts for 3.6% of all units in Workington. The Tesco Superstore, located 700m north west of the town centre, is an important convenience destination for

the centre but in effect, will likely be drawing footfall away from the primary shopping area of the town centre.

- 5.12 There are 81 comparison goods operators in Workington, which account for 21,190 sq.m of floorspace and equate to 40.6% of the total stock of commercial floorspace. The percentage of floorspace taken up by comparison operators is 7% higher than the UK national average (33.6%). Operators include Home Bargains, Clintons Cards, Next, Debenhams, Peacocks, Boots, Sports Direct, Superdrug, Vodafone, O2, H.Samuel, alongside a range of charity shops, independent and smaller retailers. The range of comparison operators in Workington is considered to be Workington's key strength, despite the presence of two out-of-centre retail parks within 2km of the town centre.
- 5.13 Workington are currently progressing their Town Fund bid to secure up to £25m from the Government's Town Fund. If successful, this could provide important funding to oversee long-term growth, improved connectivity and vital infrastructure projects.
- 5.14 Workington has a relatively strong service offer which is generally in line with UK national averages for floorspace and units. Approximately half of the total stock of retail units are occupied by leisure, retail or financial and business service use (122 units). This equates to 37.4% of floor space in Workington.
- 5.15 The vacancy rate is higher than the UK national average, with approximately 13.8% of floorspace vacant (compared to 10.4% nationally) and 14.6% of units (compared with 11.9% nationally). Whilst the vacancy rate, in terms of the units, has increased since 2015, the vacancy rate in respect of floorspace has remained relatively consistent with the 2015 figure (approximately 13%).
- 5.16 On the whole, vacancies are distributed across the town centre however, there are areas which appear to suffer more with vacancies, firstly at the junction of Wilson Street with Market Place, and secondly at the junction of Pow Street with Ivison Lane. Longer term vacancies are located toward the periphery of the town centre. A notable exception to the vacancy patterns is the vacancy of unit 2 Washington Square, which occupies a prime corner frontage at the cross roads of the pedestrianised square, however this is a result of the former retailer, 'Yours' moving to the smaller unit 7 at Washington Square. Consideration should therefore be given to encouraging activity throughout the whole

- centre. A temporary solution to vacant units, particularly those occupying prime locations in the centre, could include allowing independent retailers to create window displays in vacant units, or encouraging 'pop-up shops' to provide short-term leases for new and local retailers.
- 5.17 Workington benefits from a market held on Wednesdays and Saturdays. The market boasts a variety of stalls offering goods such as clothing, plants and flowers, fruit and veg and hot and cold takeaway food.
- 5.18 Overall, we consider that the health of the town centre is mixed. There is a strong comparison offer, focused around Washington Square Shopping Centre. However, the centre's convenience offer is limited, due to the presence of larger competitors out of the centre, but this has allowed the growth of Workington as a comparison and service orientated centre. The vacancy rate is higher than the average, and the number of vacancies has increased since the previous study. The environmental quality of the centre is considered to be mixed, and there are areas in need of regeneration and in particular, improvements are needed to the public realm. We are also of the view that a general public realm strategy is required to tie together each element of the centre, creating a coherent vision and encouraging footfall across the centre as a whole.
- 5.19 In this regard, we note that the Allerdale Local Plan Part 2 identifies two sites within Workington town centre for additional commercial uses – Central Car Park (0.9ha) and the Royal British Legion (0.2ha). In this regard, we agree with the Inspector's modifications in respect of providing more flexibility in terms of the types of uses permitted on the site, and that particularly given the current commercial climate, a wider range of uses such as residential could also go some way to helping to secure the future vitality and viability of the town centre. Given that we are currently looking at a commercial climate where there is less reliance on retail uses and a need to repurpose existing stock, the creation of new community, leisure and residential hubs will be key to meeting local residents' needs.
- 5.20 Any future edge of centre town centre use scheme must be appropriately designed to meet market demands but also ensure that it does not compete directly with the existing uses within Workington town centre. In this regard, helping to protect the future of Workington town centre must be the Council's priority and future aspirations therefore need to respond to commercial market requirements at that time.

Table 5.1: Workington SWOT Analysis

Strengths	Weaknesses
<p>Washington Square Shopping Centre provides a modern, attractive and pedestrianised centre, which benefits from the presence of several national comparison and retail service operators which act as an anchor to the centre.</p> <p>The centre has a high level of accessibility to public transport, with Workington bus station located in the centre and a high level of car parking.</p> <p>The centre is generally pleasant and feels safe and secure. The community hub, located on Oxford Street, is considered to be a unique strength of Workington town centre.</p>	<p>The centre does continue to exhibit certain signs of weakness, most notably the range and quality of the convenience offer, the quality of the built environment in certain areas and the presence of prominent vacant units.</p> <p>The periphery of Workington town centre has a higher proportion of vacancies and there are a number of streets which would benefit from a consistent shop front design and improved quality of public realm.</p> <p>The Tesco store and other out of centre retailing acts as a draw away from the centre.</p>
Opportunities	Threats
<p>Workington’s independent leisure offer on Washington Street and sports presence indicates an opportunity to increase the leisure offer of the town centre which, at present, is dominated by comparison uses.</p> <p>There are opportunities to increase the level of pedestrianisation in key parts of the centre (particularly Murray Road and Finkle Street) to help improve the flow of footfall in the centre and create additional informal areas for community events. This should include additional wayfinding and signage opportunities to encourage footfall throughout the centre.</p> <p>Workington’s progression of the Towns Fund Bid is a key opportunity to fund the above measures and maximise the centres strengths.</p>	<p>The out-of-centre floorspace continues to act as a threat for Workington, drawing footfall away from the centre. Additionally, the pull of West-Cumbrian residents to Carlisle rather than Workington is a further threat.</p> <p>Wider macro-economic trends and shifts to online shopping may impact the centre further, with further threats on the closures of additional comparison and leisure operators in particular.</p> <p>The Council will need to continue to work proactively with landowners to encourage alternative uses for buildings which are vacant for longer periods of time.</p>
Recommendations	
<ul style="list-style-type: none"> • Build upon and support Workington’s independent leisure offer on Washington Street by improving pedestrian linkages through a new wayfinding and signage strategy and additional public realm improvement schemes; • Encouragement of additional town centre living to increase the footfall throughout the day and evenings and help to support existing and future businesses in the centre; • The opportunity to increase the leisure offer of the town centre through the encouragement of the re use and rationalisation of existing stock within the town centre, and appropriate development of new modern format units. This could be achieved through the redevelopment of the bus station; and • Improve linkages between the train station and the primary shopping area. 	

Whitehaven

- 5.21 The Copeland Local Plan (comprising the Core Strategy and Development Management Policies DPD, 2013) identifies Whitehaven as the principal town within the authority area. Whitehaven town centre is the principal centre in Copeland Borough and provides the main hub of retail and service uses within the Borough, benefiting from two train stations. Notwithstanding Whitehaven's important role in serving Copeland's needs, the town centre provides an offer which complements that of nearby Workington.
- 5.22 Whitehaven is a harbour town situated on the west coast of England, which is the first post-medieval new planned town in England, home to over 170 listed buildings. The town is the most complete example of planned Georgian architecture in Europe. Whitehaven is located 11km south of Workington via the A595, which also connects the town to Carlisle. It is also home to several tourist attractions including the Beacon Museum, The Rum Story and the harbour itself and is easily accessible from the A595 and Whitehaven Train Station. The harbour at Whitehaven is the start of the 'C2C' (Sea to Sea) cycle routes, a popular cycling challenge.
- 5.23 The main focus of retailing in Whitehaven town centre is concentrated on King Street which is located in the western part of the town centre, close to the Marina. King Street, which comprises a northern and southern stretch separated by Lowther Street, provides a traditional pedestrianised town centre shopping street. King Street is supported by the surrounding shopping streets of Lowther Street, Market Place, Duke Street and Tangier Street which are considered to form the main 'retail core' of the centre. Morrisons supermarket is located in the south-eastern part of the town centre at Flatt Walks and is adjoined immediately to the south by the Bridges Retail Park, which comprises retail warehousing units (occupiers include B&M Homestores, Greggs, Shoe Zone and Carpetright) and lies just outside of the town centre.
- 5.24 Additional traditional town centre retail units are located in more peripheral parts of the town centre, such as along Swingpump Lane, Bransty Row and Roper Street. There is a Tesco superstore located immediately north of the town centre off Bransty Row and Preston Street Retail Park is located immediately to the south-west. The Preston Street Retail Park comprises Aldi and Iceland

- supermarkets, as well as a Home Bargains store. There is also an Asda supermarket adjacent to the retail park.
- 5.25 The former bus station in Whitehaven is under development as part of the wider Whitehaven North Shore Redevelopment Programme brought forward by BEC, a property development partnership between the Nuclear Decommissioning Authority, Copeland and Allerdale Borough Councils and Cumbria County Council. The BEC North Shore Development Programme aim to create space for food and drink establishments, business incubators, conference space, a 4* hotel and modern offices along the north shore of Whitehaven as part of the marina's re-development. This programme spans three main sites; the bus depot, land on which the former Marks House stood and the former bus station.
- 5.26 Overall there are 285 units located within Whitehaven town centre. These account for 52,230 sq.m of commercial floorspace. The current vacancy rate within the Goad centre boundary is recorded as being 9.4% of commercial floorspace, and 12.9% of all units. Compared to the other appraised centres in Copeland, Whitehaven's vacancy rate is lower than the UK average for floorspace vacancies, and although slightly higher than the UK average with regard to vacant units, has the lowest vacancy rate seen across the four town centres.
- 5.27 Convenience and comparison uses account for 23,340 sq.m (44.7%) of floorspace and 31.9% of all units. Service uses (leisure, retail and financial and business services) account for 45.9% of all floorspace and 55.0% of all units, occupying 157 units in total.
- 5.28 The town centre benefits from the defining characteristics of a harbour town architecture and layout, along with a market offering a range of goods from outdoor stalls which is held on Thursdays and Saturdays. However, at present the level of vacancies on King Street are beginning to detract from the environmental quality of the area and since the undertaking of the healthchecks we understand that a number of national retails are planning closures or have closed.
- 5.29 Whilst Market Place provides a somewhat functional 'town square' with a central statue and the public facing Council Offices, there are few retail or leisure orientated features that would encourage users to spend more time in the area rather than simply move through the space.

- 5.30 Overall, we have found that Whitehaven has a relatively good commercial offer and the vacancy rate, although is above the UK average in terms of the number of units, is below the average in terms of floorspace. However, the centre is lacking in terms of its overall offer of national multiples which is likely due to the approximate strong commercial destinations of Workington town centre, potential limits regarding the sizes and types of available units in the centre, and the out of centre retail parks, particularly within Allerdale's authority area. However, the centre's convenience offer (albeit in edge or out of centre locations) is considered to be good, and future schemes to encourage the linkages between the convenience operators and primary shopping area should be encouraged to increase the proportion of 'linked trips' to other destinations in the centre. Furthermore, it will be important to encourage the improvement of the shopfront facades along the pedestrianised street of King Street, given the central and important function this area has within Whitehaven.
- 5.31 Notwithstanding the varied vitality and viability of the town centre, it is evident that Whitehaven performs an important role in catering for the retail and service needs of Copeland Borough and to some extent the wider surrounding area, albeit on a relatively localised basis given the proximity of higher order centres such as Workington. Further strategies to help improve the overall cultural and tourist offer should be explored, particularly to help encourage more visitors to the harbour. Indeed, we are of the view that this area could be enhanced to provide additional leisure uses and build upon this important asset within the centre.
- 5.32 In July 2019 Copeland Council was invited to submit a bid for investment in Whitehaven as part of the Future High Streets Fund. The Council submitted the Whitehaven Future High Streets Fund Bid in June 2020. The objectives of the Whitehaven Future High Streets Fund Bid are to:
- Visually and physically connect the retail centre and the harbour;
 - To increase footfall and improve pedestrian flow onto the main retail street;
 - To manage traffic and prioritise pedestrian access, creating safe cycleway connections;
 - Broaden the mix of uses and space available for start-ups and investment;
 - Increase availability of smart living accommodation; and
 - To support sustainability through increasing footfall on weekends and evenings.

- 5.33 The vision proposes to develop a community digital hub at 6 Duke Street (the former Whittles building) and make the most of the C2C cycle route by creating a cycle hub at the former Barclays Bank site offering bike sales, bike hire, e-bikes, bike storage, repairs, a juice bar and guided tours. The proposal also aims to create residential opportunities with a focus on young professionals and post-graduate students along with public realm and street scene initiatives which will create a connection between King Street and the harbour at Strand Street comprising new arcades, a food court and artisan/small scale leisure spaces.
- 5.34 In this regard, we note that the Issues and Options version of the Copeland Local Plan (November 2019) includes an option to facilitate an edge of centre site in Whitehaven to provide land for future growth of retail and town centre uses. As we discuss later in the report, there may be opportunities to enhance the convenience offer in Whitehaven town centre, alongside additional leisure and residential uses to better meet both the resident catchment’s needs but also the needs of the transient workforce and tourists. Any such allocations should be sufficiently flexible to allow a range of uses, particularly in light of the current market and requirement to diversify town centres. Again, opportunities for further town centre living should be explored to increase activity in the centre both throughout the day and evening, and help support both existing and future businesses in the centre.

Table 5.2: Whitehaven SWOT Analysis

Strengths	Weaknesses
<p>Whitehaven benefits from recent investment into the civic hall quarter and surrounding public realm, along with a good level of community facilities and leisure services.</p> <p>Overall the public realm and architecture is attractive and the town benefits from its coastal location with associated harbour. The tourist attractions bring footfall into the centre, and should be supported further in formulating a future strategy for the centre.</p> <p>The centre has a strong convenience offer, albeit this is principally in an edge or out of centre location. The comparison offer is good and provides a day-to-day offer for residents, transient workers and tourists.</p>	<p>Whitehaven has potential to use its attractive architecture and location by the coast, along with its tourism inflow to its benefit. However, there is a current lack of coherence throughout the centre in terms of design, public realm, wayfinding and a recent number of additional vacancies in key prominent locations, all of which detract from the overall aesthetics of the centre.</p>

Opportunities	Threats
<p>There is the opportunity to build upon transient workers trade, improve the quality of the leisure offer, and make improvements to pedestrian movements and safety in the centre.</p> <p>Given the centre's location in proximity to Workington which serves a more dominant comparison need, there is an opportunity for Whitehaven to build on its independent and leisure offer to provide a destination which meets not only the local residents' needs but also the transient workers and tourists' needs, all of which can help to bring expenditure into the centre.</p> <p>The future strategy for Whitehaven must also build on its key coastal location, tourist offer and regenerate much of its beautiful architecture through the peripheral areas.</p> <p>The potential receipt of a share of the Governments £675 Future High Streets Fund would present a key opportunity to invest in the above opportunities and fund measures and infrastructure improvements to reduce the threats to the centre.</p>	<p>The further closure of national multiples within the primary shopping area of Whitehaven, along with competition from both Workington and out of centre retail parks presents a threat to the future of Whitehaven.</p> <p>Furthermore, the lack of frontage onto the coastal road of Strand Street reduces perception of safety and visual attractiveness of the town from the Millennium Promenade and Marina. This creates a lack of interaction between the Promenade/Marina area and the town itself.</p>
Recommendations	
<ul style="list-style-type: none"> • Build upon the retail and leisure offer for transient workers; • Increase the level of town-centre living within Whitehaven, providing space for the workers and residents in the centre. This will also increase the footfall both throughout the day and evening and increase the demand for leisure operators in the evening; • Improve the overall aesthetics of shopfronts and build upon the centre's attractive architectural heritage which makes the centre unique; • Build upon the leisure and tourist offer to maximise on the coastal location, and encourage visitors throughout the centre through an improved wayfinding and signage strategy; and • Improve pedestrian movement and safety throughout the centre. 	

Key Service Centres

- 5.35 The composition of each of the eight key service centres is provided in figure 5.3 below. With the exception of Silloth and Cockermouth, West Cumbria's Key Service centres display vacancies higher than the UK average of 11.9% of units (Experian Goad Report, 2020).

Table 5.3: Key Service Centre Unit Composition (%) at 2020

Key Service Centre	Convenience	Comparison	Retail Services	Leisure Services	Financial & Business Services	Vacant	Total
Allerdale							
Maryport	6.5%	24.2%	20.2%	21.8%	2.4%	25.0%	124
Cockermouth	5.7%	34.1%	13.1%	27.3%	9.1%	10.8%	176
Wigton	9.5%	28.6%	15.2%	21.9%	8.6%	16.2%	105
Silloth	12.2%	17.1%	63.4%			7.3%	34
Aspatria	8.8%	14.7%	55.6%			20.6%	41
Copeland							
Cleator Moor	6.0%	16.0%	12.0%	34.0%	2.0%	30.0%	50
Millom	8.6%	29.0%	19.4%	16.1%	4.3%	22.6%	93
Egremont	6.5%	16.9%	24.7%	26.0%	1.3%	24.7%	77

Source: Composition of Town Centre derived from Nexus Planning survey of January 2020 using Experian Goad survey area.

- 5.36 Cockermouth is the largest of the eight key service centres in West Cumbria. Having suffered from flooding in recent history, to the detriment of the high-street’s functioning, Cockermouth high-street benefits from more recent public realm works than other centres within West Cumbria. Despite the negative effects of flooding upon the high streets functioning in recent years, the current vacancy rate within the Goad centre boundary is recorded as being 10.8% of total commercial floorspace and 10.8% of all units. This is on par with the UK national average and is the result of a bank closure and several current renovations to units which we expect to be open and trading in the short term. Furthermore, Cockermouth demonstrates a good amount of services which meet the needs of local residents along with tourists. The town doesn’t appear dependent upon tourist trade and demonstrated a substantial footfall during the visit undertaken to inform this study.
- 5.37 Maryport has been shortlisted for the next stage of the Governments Future High Streets Fund. As such, Maryport is currently working toward submitting a formal bid. If successful in gaining funding, the money could be used to improve transport and access, convert vacant retail units and invest in vital infrastructure. Maryport is largely characterised by its seaside location, however the town lacks an anchor store and in terms of vacant units, the town demonstrates the highest level of vacancies across the six town centres located within Allerdale Borough Council. The centre lacks a strong, quality retail or leisure offer and shop fronts look dilapidated. As such, Maryport will benefit from potential

Future High Streets funding. If the bid is successful, this will allow investment into the conversion of empty units, improvements to the promenade and harbour, and will allow the planning of a series of events in the town to ensure it is more attractive to both visitors and local residents.

5.38 The objectives of the Maryport Future High Streets Fund Bid are to increase footfall along the high street and make Maryport more attractive to businesses, residents and visitors whilst maintaining longevity of the high street. To achieve this, public realm is a key focus for the proposals, with the aim of connecting the route from the train station through the high street from the harbour to the promenade along with addressing parking requirements for the town centre and key pedestrian junctions along Curzon Street.

5.39 Interventions include:

- Widening footpaths and reducing carriageway width to enhance the pedestrian environment;
- Creation of two gateway features entering the town from the north and south on Curzon Street;
- Introduction of ornamental and tree planting where possible to soften the hard urban grain;
- The creation of slight kinks and raised tables along Senhouse Street;
- Installation of benches and seating opportunities;
- Raised pedestrian crossing at key road junctions; and
- Retain on street parking for existing residents.

5.40 The vision also looks to address vacant units through a repurpose grant fund, working to assist local building owners to upgrade their first floor accommodation into high quality office or residential units. The aim is to draw new users to Maryport, to increase footfall and demand along the high street. The proposal also aims to offer grant support for units that front Senhouse Street to visually improve the overall impression of Maryport for business owners, residents and visitors. Alongside this, the proposals identify a number of key sites including Empire Yard and the Carlton. Empire Yard is proposed to create a flexible covered event space for community events, markets and commercial units focussed at food and drink. The Carlton is proposed to be brought back into active use by relocating theatre space from The Wave to the Carlton and provision of event space focussed toward the arts and craft movement.

- 5.41 Wigton town centre is anchored by the Co-op Food Store approximately 100m north of King Street. There are two primary retail streets in Wigton: King Street, the location of B&M, Greggs, and SPAR; and High Street, the location of a number of independent comparison stores and a green grocer. Due to the presence of the out-of-centre national anchors (Co-op and Lidl) the centre's convenience offer is limited, albeit there remain 3 butchers, several independent retail services in the form of hair dressers, and several cafes. A market is held on Fridays in the centre and offers a range of goods including fresh produce, plants, confectionary and home baked cakes. The vacancy rate, in terms of floorspace, has tripled since the last study in 2015. Meanwhile, the vacancy rate, in terms of the units, has increased by 6.2 percentage points since 2015. This could be attributable to the loss in financial units and floorspace caused by the closure of Barclays, Nat West and HSBC, along with the Wigton's only fishmonger, and Kildcare café. However, Wigton will benefit from the Borderlands Growth Deal. The Borderlands Growth Deal amounts to £394.5 million – of which £350m will come from the UK and Scottish governments and £44.5m from the combined five local authorities. This will allow investment into projects and programmes in Wigton which will aim to revitalise the small town.
- 5.42 Silloth is the location of a number of holiday villages, a Golf Club and 41 units which account for 4,690 sq.m of commercial floorspace. The main opportunity in Silloth is to build upon the existent community spirit to empower the diversification of the retail offer to serve residents as well as tourists as the town already benefits from quality open space, and a number of good quality buildings along Criffel St which fronts the Green Flag Awarded Green and contributes to a classic seaside environment where there is access to a promenade, an activity play area, and a vast green used for events such as the Silloth Music and Beer Festival. Silloth also benefits from a market held every Thursday between Easter and October. Positively, Silloth demonstrates the lowest vacancy rate of the ten centres assessed across West Cumbria as part of this retail study and the vacancy rate is also lower than the UK national average with regard to both floorspace and units.
- 5.43 Aspatria is the smallest of the key service centres in Allerdale, and the region of West Cumbria, with just 34 units located within the GOAD town centre boundary. Aspatria was originally a market town and is situated on the A596 however, the centre lacks a strong, quality retail or leisure offer. Positively, Aspatria benefits from a large amount of public services, with a large library and young parents centre, along with a community centre. The centre's convenience offer is limited and will lessen further with the temporary exit of the co-op from the town for rebuilding.

- 5.44 Cleator Moor market place provides an attractive and central location for community events, there are also efforts made with regard to planting and seating in the town. However, the town centre lacks an anchor food store or presence of national retailers to pull footfall and encourage users to spend time in the area rather than simply moving through. Positively, the town benefits from a motivated community, who have recently opened a community shop and are bidding for a share of the Governments Town Fund, which could secure up to £25 million for the town, and could potentially open up opportunities to reduce the vacancy rate and fund measures to improve the environmental quality of the centre. The town also boasts a market held on Fridays and a local medical centre which acts as a community hub. Reflective of the lack of anchor, Cleator Moor has the highest vacancy rate of all ten town centres assessed as part of this retail study. As such, due to the limited provision in Cleator Moor and the proximity of Whitehaven, residents of Cleator Moor are looking elsewhere to meet many of their convenience and comparison goods shopping needs. This is apparent from the high number of vacancies and the low levels of footfall we observed on our visit. Notwithstanding this, Cleator Moor does provide a key service for local residents, particularly less mobile residents who do not have access to a private vehicle.
- 5.45 Egremont, located approximately 5km north of Sellafield Nuclear Site, is largely focussed around the Co-op Food Store, however the Market Hall provides a space for independent retailers and community interaction in Egremont which increases footfall. Aside from some largely derelict, vacant spaces toward the south of the high street, Egremont has a diverse mix of uses and a good level of independent traders/retailers, along with a national multiple anchor store. However, Egremont's vacancy rate is higher than the UK national average. Egremont is the focus of Copeland's bid for funding through the Borderlands Inclusive Growth Deal. As such, there are opportunities to support growth through community efforts, allowing independent retailers to create window displays in vacant units, or encouraging 'pop-up shops' to provide short-term leases for new and local retailers. In the longer term, ensuring the renovation and reuse of the vacant and historic buildings will be of central importance to the quality of Egremont's high street.
- 5.46 Millom is the southern-most of the 10 centres, somewhat isolated from the other nine town centres by the Lake District National Park. Millom has a strong anchor store and secondary convenience offer, with a total of 93 units, however there is a large cluster of vacancies which detract from both the environmental quality and viability of the area. Ensuring the renovation and reuse of the vacant and historic buildings, along with community and local independent retailers use of vacant units will be

central to ensure residents of Millom do not begin to travel elsewhere, such as to Barrow-in-Furness, to meet their convenience and comparison goods shopping needs. In this respect, the Towns Fund, and potential to receive a share of up to £25m of Government funding for Millom would be a core opportunity to make such investments.

Table 5.4: Key Service Centre Recommendations

Key Service Centre	Recommendations
Allerdale	
Maryport	<ul style="list-style-type: none"> To build upon the tourist trade and marina offer and better connect this area to the town centre through an improved wayfinding strategy; Improve the links between the centre and the Lidl and B&M stores to encourage linked-trips with the centre. It is vital that the centre builds on the level of trips attracted to those stores and not losing the footfall altogether; Introduction of a shopfront strategy to control future development in the centre; Encouragement of additional residential living in the centre; Redevelopment/ renovation of the vacant market hall building on Senhouse Street to improve the commercial offer of the centre and attract additional footfall into the centre; and Improved connections between the Town Centre, the library and the train station.
Cockermouth	<ul style="list-style-type: none"> Support for the creation of informal community event space for markets and local festivals; Provide a new signage strategy to encourage the movement of residents and tourists throughout the entire centre and encouraging additional linked-trips; and Maintenance of current mix of retail offer to ensure the needs of both residents and tourists are met.
Wigton	<ul style="list-style-type: none"> Improve pedestrian linkages and safety throughout the centre but particularly to encourage linked-trips between the Co-op and the wider operators in the centre; and Renovation of historic vacant buildings for re-use and diversification.
Silloth	<ul style="list-style-type: none"> The improvement of pedestrian legibility, safety and linkages in the centre; and There is opportunity to build upon the existent community spirit to empower the diversification of the retail offer to serve residents as well as tourists.
Aspatria	<ul style="list-style-type: none"> Improvement to pedestrian linkages across the town; Focussing of the retail offer at the centre of the high street; Redevelopment of key buildings in the 'heart' of the centre which could substantially improve the overall aesthetics of the centre; Diversification and improvement to the quality of the retail offer; and Environmental and public realm improvements.

Key Service Centre	Recommendations
Copeland	
Cleator Moor	<ul style="list-style-type: none"> • Build upon and make more of the community spirit demonstrated by the local community by making more of the Market Place through encouraging informal and formal events; • Repair derelict older buildings and promote alternative uses within the former commercial buildings; and • Diversify offer to meet needs of both residents and visitors.
Millom	<ul style="list-style-type: none"> • Public realm improvements across the town centre as well as a focus on Market Square • The potential to regenerate historic buildings through the creation of new leisure and community uses; and • Improve public transport links and the pedestrian links from the station into the town centre, to encourage additional footfall into the wider centre.
Egremont	<ul style="list-style-type: none"> • Reduce vacancy rates by building upon the independent and community offer of the centre, branching out the market hall offer. • The repair and renovation of derelict blocks on the east side of Main Street; and • The repair and renovation of vacant units to the west side of South Street, as one of the principal gateways to the town.

6.0 Population and Expenditure

Study Area

- 6.1 In January 2020, a survey of 1,000 households was undertaken by NEMS within the defined Study Area in order to ascertain where residents go to undertake a range of shopping and leisure activities. As set out in the introductory Section 1 of this report, the Study Area is derived from that utilised by the 2009 and 2012 Addendum to the West Cumbria Study, and is purposely drawn to incorporate parts of neighbouring authorities.
- 6.2 The defined Study Area has been broken down into eight separate zones (in a manner which is also consistent with the 2009 and 2012 Study) which reflect postcode sectors. The eight zones are considered to be representative of geographic areas that may accommodate broadly similar patterns of shopping behaviour. The below table 6.1 sets out the postcode sectors which define each of the zones.
- 6.3 The zones were used as the basis for the NEMS household survey, which is used to inform our assessment of shopping patterns (with relation the market share of expenditure claimed by various destinations), which is set out at Section 7 of this report. The survey results also underpin the quantitative retail capacity assessment provided at Section 8. However, in order to consider the flow of expenditure to retail destinations, it is first necessary to estimate the population and future convenience and comparison goods expenditure apparent in the Study Area.
- 6.4 The Allerdale authority area broadly comprises Study Area Zones 1 to 5, and the Copeland authority area comprises Study Area Zones 6 to 8.

Table 6.1: Study Area Zones by Postcode Sector

Survey Zone	Postcode Sectors
1	CA7 0, 3, 4, 5, 8, 9
2	CA15 6, 7, 8
3	CA13 0, 9 and CA7 2
4	CA12 4, 5 and CA7 1
5	CA14 1, 2, 3, 4, 5
6	CA24 3, CA25 5, CA26 3, CA28 6, 7, 8, 9
7	CA19 1, CA20 1, CA21 2, CA22 2, CA23 3 and CA27 0
8	LA18 4, LA18 5, LA19 5 and LA20 6

6.5 The population within each postcode sector and each zone at 2020 has been calculated using Experian Micromarketer G3 data (2018 estimate, which was issued in February 2020). When estimating the future population of the Study Area, consideration has been given to the authorities' population projections across the period to 2035.

6.6 Table 6.2 below sets out Experian's population projections for each zone in the Study Area for base year 2018 and reporting years 2020, 2025, 2030 and 2035.

Table 6.2 Estimated Study Area Population by Survey Zone

Zone	2018	2020	2025	2030	2035
1	19,602	19,662	19,669	19,604	19,485
2	16,793	16,856	16,939	16,952	16,864
3	18,074	18,072	18,082	17,981	17,842
4	10,163	10,099	10,019	9,909	9,753
5	36,467	36,508	36,514	36,354	36,190
6	39,926	39,653	38,846	37,965	37,249
7	18,023	17,837	17,474	17,079	16,550
8	11,718	11,625	11,346	11,146	10,922
Total	170,766	170,312	168,889	166,690	164,855

6.7 The above table sets out our estimate that the Study Area population will decrease from 170,766 persons at 2018 to 164,855 persons at 2035, which equates to a loss of 5,911 persons over the 17-year period. These projections are based upon previous trends. In this context, planning policy in both Allerdale and Copeland seeks to minimise population decline and to support and encourage future growth.

Retail Expenditure

- 6.8 In order to calculate per capita convenience and comparison goods expenditure, we have again utilised Experian Micromarketer G3 data, which provides detailed information on local consumer expenditure that takes into consideration the socio-economic characteristics of the local population.
- 6.9 The base year for the Experian expenditure data is 2018. Our methodology takes account of the fact that some special forms of trading expenditure⁷ is not available to support retail floorspace, and then allows for increases in per capita expenditure growth on an annual basis.
- 6.10 Figure 5 of Appendix 3 of ERPBN17 provides forecasts in respect of the proportion of convenience and comparison goods expenditure that will be committed through special forms of trading both now and in the future. We have 'stripped out' any survey responses which relate to expenditure committed via special forms of trading and have instead made an allowance derived from Experian's recommendations (which we consider to be the most appropriate means by which to account for such expenditure).
- 6.11 In considering special forms of trading, it should be noted that many products which are ordered online are actually sourced from a store's shelves or stockroom (particularly in the case of convenience goods). As such, expenditure committed in this manner acts to sustain shops and can be considered 'available' to support floorspace within the Study Area.
- 6.12 Accordingly, in order not to overstate the influence of special forms of trading on retailers, our methodology utilises Experian's 'adjusted' allowance for special forms of trading (which is provided at Figure 5 of ERPBN17). This allowance indicates that 3.8% of convenience goods expenditure and 16.8% of comparison goods expenditure is 'lost' from shops at base year 2018 through special forms of trading purchases.
- 6.13 Having made allowance for special forms of trading, we then take account of projected changes in expenditure in accordance with the recommendations provided by Figure 6 of Appendix 3 of ERPBN17. Experian provides overall growth rates and 'adjusted' rates, which account for any

⁷ Identified as comprising sales via the internet, mail order, stalls and markets, door-to-door and telephone sales (i.e. all expenditure not available to traditional retail floorspace)

additional increases in expenditure lost to special forms of trading. We set out Experian's expenditure growth estimates below in Table 6.3.

- 6.14 The latest growth rates suggest that Brexit will likely influence per capita expenditure growth in the short term, but that growth in comparison goods expenditure should pick up in the medium term as confidence in the economy returns. The outlook is less optimistic in respect of convenience goods growth, which is a consequence of shoppers embracing discount retailers and looking to secure value from the food shopping.
- 6.15 For convenience goods, Experian forecasts very limited per capita expenditure growth across the entire period to 2035. The position is even more pessimistic when account is taken of future growth in special forms of trading, with Experian's forecasts suggesting that the growth in convenience goods expenditure available to actual stores will not exceed 0.1% per annum across the entire period 2020 to 2035, except for a 0.5% growth in 2021. Overall, it is evident that per capita convenience goods expenditure is forecast to increase only very marginally in the period to 2035.
- 6.16 The position in respect of comparison goods expenditure is more positive. Experian forecasts that per capita comparison goods expenditure growth will increase from 3.0% at 2020 to 3.1% at 2025, and will thereafter not exceed 3.1% per annum in the period from 2025 to 2035. Experian's forecast suggests that there will be relatively healthy growth in comparison goods even after accounting for expenditure lost to special forms of trading. Growth in expenditure forecasts in the longer term (beyond the next ten years) should be treated with caution given the inherent uncertainties associated with predicting the performance of the economy over time (particularly in the current economic and political climate). As such, assessments of this nature should be reviewed on a regular basis in order to ensure that forecasts over the medium and longer term reflect changing circumstances.
- 6.17 In this regard, we also note that paragraph 85 of the revised NPPF requires local planning authorities to allocate sites to meet likely needs '**...looking at least ten years ahead**', which differs from the previous requirement to meet needs across the entire plan period. We believe that this change directly reflects current economic conditions and changes in the retail sector in recent years.
- 6.18 By applying Experian's recommendations in respect of special forms of trading and expenditure growth, we are able to produce expenditure estimates for each survey zone and the Study Area as a whole at 2020, 2025, 2030 and 2035.

Table 6.3: Experian Retail Planner Briefing Note 17 Convenience and Comparison Goods Annual Growth Rates

Year	Convenience Goods	Convenience Goods 'Adjusted SFT'	Comparison Goods	Comparison Goods 'Adjusted SFT'
2018	1.0	0.6	3.4	2.0
2019	-0.4	-0.8	3.9	2.9
2020	0.0	-0.3	3.0	2.0
2021	0.5	0.2	3.2	2.3
2022	0.0	-0.3	3.2	2.3
2023	0.1	-0.2	3.3	2.4
2024	0.1	-0.2	3.2	2.3
2025	0.1	-0.1	3.1	2.2
2026	0.0	-0.1	3.1	2.3
2027	0.1	-0.1	3.1	2.4
2028	0.1	0.0	3.1	2.5
2029	0.1	0.0	3.1	2.6
2030	0.0	-0.1	3.1	2.7
2031	0.1	0.0	3.1	2.7
2032	0.1	0.0	3.1	2.7
2033	0.1	0.0	3.0	2.7
2034	0.1	0.1	3.0	2.8
2035	0.1	0.1	3.1	2.8

Source: Figure 6 of Appendix 3, Experian Retail Planner Briefing Note 17 (February 2020)

Convenience Goods Expenditure

6.19 Taking into account the Study Area resident population and the available per capita convenience goods expenditure, we estimate that £369.6.m⁸ of convenience goods expenditure originates within the Study Area at 2020. The below Table 6.4 indicates that available Study Area convenience goods expenditure is forecast to decrease to £355.4m at 2035.

Table 6.4: Total Available Study Area Convenience Goods Expenditure

2020 (£m)	2025 (£m)	2030 (£m)	2035 (£m)
369.6	364.4	359.3	355.4

Source: Table 2a of Appendix 6
In 2018 prices

6.20 Table 6.5 indicates that this represents a decrease of £14.2m (or 4.0%) across the Study Area between 2020 and 2035. The slight fall in per capita convenience goods expenditure identified above can

⁸ In 2018 prices, as is every subsequent monetary reference

largely be attributed to the forecast decrease in the Study Area's population. Therefore, if population was to grow instead of decrease over the plan period, then there is the potential for there to be a higher level of available convenience and comparison expenditure available to support additional floorspace in the authority areas.

Table 6.5: Growth in Available Study Area Convenience Goods Expenditure

Growth 2020-25 (£m)	Growth 2020-30 (£m)	Growth 2020-35 (£m)
-5.2	-10.3	-14.2

Source: Table 2a of Appendix 6
In 2018 prices

- 6.21 We have assumed that around 75% of available convenience goods expenditure would take the form of main food shopping and that around 25% would take the form of top-up shopping (which relates to smaller purchases, often including staple items such as milk and bread)⁹. By applying this ratio, we estimate that main food shopping trips account for £277.2m of Study Area convenience goods expenditure at 2020, and top-up shopping trips account for £92.4m.

Comparison Goods Expenditure

- 6.22 For comparison goods, Table 6.6 sets out our estimate that the resident population of the Study Area will generate £492.8m of comparison goods expenditure at 2020. Available comparison goods expenditure is then forecast to grow significantly to £710.9m at 2035. As identified at Table 6.7, this represents a substantial increase of £218.2m between 2020 and 2035. The large majority of this growth is forecast to occur in the medium to longer term (i.e. after 2025).

Table 6.6: Total Available Study Area Comparison Goods Expenditure

2020 (£m)	2025 (£m)	2030 (£m)	2035 (£m)
492.8	547.6	629.0	710.9

Source: Table 8 of Appendix 6
In 2018 prices

- 6.23 The identified increase in comparison goods expenditure growth is substantial, but it represents a level of annual growth that is more circumspect than that which has been achieved in the past. This is due to both a reduction in the overall level of growth when compared to that achieved in the early

⁹ This is a fairly standard split applied in undertaking this exercise

part of this millennium and as a consequence of further forecast increases in expenditure committed via special forms of trading (most obviously, internet shopping).

Table 6.7: Growth in Available Study Area Comparison Goods Expenditure

Growth 2020-25 (£m)	Growth 2020-30 (£m)	Growth 2020-35 (£m)
54.9	136.2	218.2

Source: Table 8 of Appendix 6
In 2018 prices

- 6.24 We sub-divide comparison goods expenditure into eight categories, these being: 'DIY', 'Electrical' and 'Furniture' (collectively referred to as bulky goods); and, 'Clothing and Footwear', 'CDs, DVDs and Books', 'Health, Beauty and Chemist Goods', 'Small Household Goods', and 'Toys, Games, Bicycles and Recreational Goods' (collectively referred to as non-bulky goods). The proportion of expenditure directed to each sub-category is estimated by Experian on a zonal basis. Experian's estimates are reflected in the detailed expenditure tables set out at Table 7b of Appendix I.
- 6.25 In considering expenditure growth, it should be noted that not all growth arising within the Study Area will be to support additional floorspace. Instead, account needs to be taken of: the market share of expenditure secured by retailers within the Borough; the claim made by existing retailers on expenditure growth (the future efficiency of retail floorspace); and, the expenditure that will be claimed by committed retail developments. We consider the matter of expenditure growth and future floorspace requirements in the following Section 7 of this report.

7.0 Market Research: Spending Patterns

Introduction

- 7.1 An assessment of spending patterns is undertaken to identify where residents across the study area are currently undertaking their convenience (food), comparison (non-food) and leisure spending. This exercise is important to establish how much money is spent in centres within Allerdale and Copeland and how much 'leaks' to other destinations in Carlisle and Barrow, and further afield.
- 7.2 Where possible, we have compared the 2020 shopping patterns and expenditure findings with the findings from the 2009 West Cumbria Study, produced by WYG. Whilst there have been subsequent studies produced for each individual authority area, the 2009 West Cumbria Study was the last Study produced to cover area of West Cumbria, and as such, is comparable in terms of the Study Area and associated zones. This enables us to provide a direct comparison of shopping patterns between the two.

Convenience Shopping Patterns

- 7.3 Table 7.1 below provides the top five destinations in each authority area based on the level of convenience expenditure. We can see from Table 7.1 that the principal destination for convenience goods shopping across the Study Area as a whole is Morrisons on Flatt Walks in Whitehaven which attracts 10.3% of available expenditure, followed by the Tesco on New Bridge Road in Workington which attracts 8.3% of expenditure. These are then followed by the Morrisons on Derwent Drive in Workington which attracts 7.5% of the total available convenience expenditure, followed by the Tesco in Whitehaven which attracts 7.2% of available expenditure.
- 7.4 The total market share (based on available expenditure) to both of the principal destinations (the Morrisons at Whitehaven and the Tesco in Workington) has reduced since 2009 by 2.7 and 3.1 percentage points respectively. Indeed, the market share to the Morrisons in Workington, the Sainsbury's in Cockermouth and the Tesco in Whitehaven has reduced in all cases since 2009.

Table 7.1: Total Convenience Expenditure Summary (Top Five Destinations)

Convenience Spending Patterns	2020 Study Area Residents' Expenditure	2020 Market Share (%)	2009 Market Share (%)
Allerdale Destinations			
Tesco, New Bridge Road, Workington	30.5	8.3%	12.4%
Morrisons, Derwent Drive, Workington	27.6	7.5%	13.2%
Sainsbury's Superstore, Station Road, Cockermouth	21.6	5.9%	6.9%
Asda, Dunmail Park, Workington	18.5	5.0%	-
Lidl, King Street, Wigton	16.6	4.5%	-
Lidl, Curzon Street, Maryport	12.8	3.5%	-
Aldi, Derwent Drive, Workington	11.2	3.0%	1.0%
Copeland Destinations			
Morrisons, Flatt Walks, Whitehaven	37.9	10.3%	13.0%
Tesco Superstore, Bransty Row, North Shore, Whitehaven	26.7	7.2%	12.8%
Aldi, Preston Street, Whitehaven	24.6	6.7%	1.0%
Tesco, Lancashire Road, Millom	14.3	3.9%	-
Co-op, Leconfield Street, Cleator Moor	6.0	1.6%	1.1%
Co-op, Main Street, Egremont	5.2	1.4%	1.9%
Asda, Preston Street, Whitehaven	3.8	1.0%	-

- 7.5 In terms of other principal destinations, within Allerdale the Sainsbury's at Cockermouth, Asda at Dunmail and Lidl in Wigton all attract over £15m. There have also been the introductions of additional convenience stores within Allerdale which have had an impact on total market shares of key convenience destinations and which will account for the loss in market share to both the Tesco and Morrisons in particular.
- 7.6 In Copeland, we can see that the Tesco in Millom attracts over £14m of convenience expenditure, or 3.9%, followed by the two Co-op stores in Cleator Moor and Egremont which attract £6.0m and £5.2m of the available expenditure respectively.
- 7.7 Table 7.2 below provides the main, top up and total retention of expenditure on a zonal basis. The retention level demonstrates the proportion of residents residing in that zone who also shop at destinations in the same zone.
- 7.8 We can see that in terms of main food expenditure, the highest retention is within Zones 5 (Workington) and 6 (Whitehaven) within which over 90% of the main food trips are retained, which are also the two zones which cover the principal centres in the Study Area with the highest number

of larger foodstores present. In addition to Zones 5 and 6, Zone 3 (Cockermouth) also retains 76.4% of main food expenditure and Zone 8 (Millom) retains 60.6% of main food expenditure. In this regard, both Cockermouth and Millom have main foodstores comprising the Aldi and Sainsbury's in Cockermouth and the Tesco in Millom, which are going some way to meet main food shopping needs.

Table 7.2: Convenience Expenditure Retention by Zone

Zone	Main Food Expenditure Retention	Top-Up Food Expenditure Retention	Total Convenience Expenditure Retention Per Zone
1	48.6%	87.9%	58.4%
2	24.0%	83.0%	38.7%
3	76.4%	80.2%	77.3%
4	34.6%	78.7%	45.6%
5	92.4%	85.8%	90.8%
6	94.5%	93.5%	94.2%
7	10.3%	73.8%	26.2%
8	60.6%	95.8%	69.4%

- 7.9 In terms of top-up food shopping trips, the retention levels are higher in the eight zones overall which is not unexpected given that residents will typically travel short distances to meet their top-up shopping needs. The highest retention can be seen in Zones 6 and 8 followed by Zones 1 and 5. However, all of the zones except zones 4 and 7 have a top-up shopping retention level of over 80%.
- 7.10 Table 7.3 below provides the overall market share for destinations in Allerdale, Copeland and then for West Cumbria as a whole. The Table also provides details of the proportion of expenditure being lost to destinations outside of West Cumbria and then to destinations outside of the Study Area.
- 7.11 Overall, we can see that the Study Area market share is 92.6% and the West Cumbria market share is 88.9% at 2020. In both cases, the market share has increased since 2009, indicating that fewer residents are choosing to shop at destinations outside of the Study Area and indeed, West Cumbria.
- 7.12 Table 7.3 also indicates that the proportion of expenditure attracted to Allerdale destinations has increased from 47.7% at 2009 to 53.2% at 2020 and within Copeland, the proportion has increased marginally from 35.6% to 35.7%.

Table 7.3: Convenience Goods Expenditure Retention and Leakage

Destinations	2020 Study Area Residents' Expenditure £m	2020 Market Share %	2009 Market Share %
Inside Study Area			
All Destinations Inside Allerdale Borough	196.6	53.2%	47.7%
All Destinations Inside Copeland	132.1	35.7%	35.6%
West Cumbria Total	328.7	88.9%	83.3%
All Destinations Outside Allerdale and Copeland	13.6	3.7%	3.5%
All Destinations Inside Study Area	342.3	92.6%	86.8%
Outside Study Area			
All Destinations Outside Study Area	27.3	7.4%	13.2%
Total	369.6	100.0%	100.0%

Comparison Shopping Patterns

- 7.13 Table 7.4 below provides the principal comparison destinations within and outside of the Study Area. The Table demonstrates that the principal destination for residents in the Study Area is Workington town centre, which attracts 27.2% of the total comparison expenditure, the proportion of which has remained consistent since 2015.
- 7.14 Derwent Retail Park, Whitehaven town centre and Carlisle city centre (outside of the Study Area) all attract over 11% of the available comparison expenditure. In addition, Cockermouth town centre also attracts approximately £36.0m, or 7.3% of the available comparison market share, which has increased since 2015 when it attracted 4.3% of the available expenditure.

Table 7.4: Total Comparison Expenditure Summary – Principal Destinations

Convenience Spending Patterns	2020 Study Area Residents' Expenditure	2020 Market Share (%)	2009 Market Share (%)
Allerdale Destinations			
Workington Town Centre	133.8	27.2%	27.2%
Derwent Retail Park, Derwent Drive, Workington	54.1	11.0%	6.6%
Cockermouth Town Centre	36.0	7.3%	4.3%
Wigton Town Centre	9.5	1.9%	1.6%
Dunmail Park Shopping Centre, Maryport Road	7.9	1.6%	1.2%
Maryport Town Centre	7.7	1.6%	1.8%
Silloth Town Centre	1.4	0.3%	0.3%
Aspatria Town Centre	1.3	0.3%	0.2%
Copeland Destinations			
Whitehaven Town Centre	56.3	11.4%	17.4%
Millom Town Centre	8.4	1.7%	1.4%
Egremont Town Centre	5.9	1.2%	0.8%
Cleator Moor Town Centre	3.3	0.7%	0.4%
Destinations Outside of the Study Area			
Carlisle City Centre	55.3	11.2%	13.0%
Keswick Town Centre	17.0	3.4%	2.9%
Barrow-in-Furness Town Centre	10.6	2.2%	4.1%

7.15 Table 7.5 below then sets out the overall comparison goods retention and leakage within the Allerdale, Copeland and West Cumbria areas. We can see that the level of expenditure attracted to destinations in Allerdale has increased since 2015, from 43.8% to 55.0%, indicating an increased attraction to destinations within Allerdale. However, this is not due to an increase in expenditure attracted to Workington town centre, but an increase to facilities at Derwent Retail Park and Cockermouth town centre.

7.16 Overall, there has been an increase in market share directed towards destinations within West Cumbria, from 65.3% at 2015 to 72.2% at 2020. However, this is down to an increase in market share to Allerdale as the proportion in Copeland has decreased overall.

7.17 The level of market share attracted to destinations located outside of the Study Area has decreased since 2015, indicating a positive move in terms of retaining expenditure in West Cumbria. However, the principal destination outside of the Study Area is still Carlisle city centre.

Table 7.5: Comparison Goods Expenditure Retention and Leakage

Destinations	2020 Study Area Residents' Expenditure £m	2020 Market Share %	2015 Market Share %
Inside Study Area			
All Destinations Inside Allerdale Borough	271.1	55.0%	43.8%
All Destinations Inside Copeland	84.8	17.2%	21.5%
West Cumbria Total	355.9	72.2%	65.3%
All Destinations Outside Allerdale and Copeland	17.6	3.6%	2.8%
All Destinations Inside Study Area	373.5	75.8%	68.1%
Outside Study Area			
All Destinations Outside Study Area	119.3	24.2%	31.9%
Total	492.8	100.0%	100.0%

8.0 Assessment of Retail Capacity

8.1 Our retail capacity tables set out our step-by-step approach to estimating quantitative retail need and are provided at Appendix I. A summary of our methodological approach, together with our findings, is provided below.

General Approach to Estimating Need

8.2 Retail capacity modelling follows the basic principle that: *Available Expenditure* minus *Expected Turnover of Existing and Committed Floorspace* equals *Expenditure Surplus or Deficit*. We summarise the key considerations relating to each component of the equation below.

Available Expenditure

8.3 As we set out in Section 7 of this report, available expenditure within a zone is calculated by multiplying the population at a given reporting year by the estimated per capita expenditure. The available expenditure takes into consideration:

- estimated population growth;
- forecast increases in per capita expenditure; and
- forecast increases in special forms of trading.

Turnover

8.4 The turnover relates to the expenditure required by existing retailers (and by retail commitments benefitting from an extant planning permission) in order to ensure that they trade viably. For convenience goods retailers, the expected 'benchmark' turnover of existing convenience goods facilities is calculated with reference to GlobalData Convenience and Comparison Goods Sales Densities of Major Grocers 2018 and Mintel Retail Rankings 2018 data¹⁰.

¹⁰ These datasets provide independent analysis of key grocery retailers' declared turnover and the overall floorspace in their portfolio in order to calculate national average sales densities

Surplus/Deficit

- 8.5 The expenditure surplus (or deficit) is calculated by subtracting the turnover of existing and committed floorspace from the available expenditure in each of the authority areas. A surplus figure effectively represents an under-provision of retail facilities within West Cumbria (which may indicate that additional floorspace could be supported), whereas a deficit would suggest a quantitative over-provision of retail floorspace.
- 8.6 Although a surplus is presented as a monetary figure, it can be converted to a floorspace requirement through the application of an appropriate sales density. In this regard, the floorspace requirement will vary according to operator and the likely sales density they could achieve. For example, in the case of comparison goods, non-bulky goods retailers tend to achieve higher sales densities than bulky goods retailers. However, within the bulky goods sector there is significant variation in the sale densities of bulky operators, with electrical retailers typically having higher sales densities than DIY or furniture retailers.
- 8.7 The turnover of destinations is generally considered with reference to retailers' net sales areas and all of the following floorspace figures relate to net sales areas. Our assessment considers convenience and comparison goods needs across West Cumbria as a whole, but then also subdivides the identified requirement in order to provide figures for Allerdale and Copeland authority areas. In addition to the authority wide capacity figures, we have also undertaken an assessment of the capacity for additional convenience and comparison floorspace on a settlement basis, also based on existing market shares.

Capacity for Future Convenience Goods Floorspace

- 8.8 In order to identify the likely need for additional convenience goods floorspace across West Cumbria, it is first necessary to consider the performance of the current provision. In this respect, the built up areas of Allerdale and Copeland already accommodate a reasonably good variety of foodstore operators. As such, we believe that many of the food shopping trips which originate within the Study Area, but are directed to facilities outside of West Cumbria, occur principally because the trip is convenient (i.e. close to home or work), rather than due to any significant deficiencies in either of the authorities' offer.

- 8.9 Consideration of convenience goods shopping patterns on a zone-by-zone basis does not suggest that there is a significant problem with shoppers driving significant distances outside the joint area to access convenience goods shopping facilities. Given this, we believe that the existing convenience goods market share of 89.1% of Study Area convenience goods expenditure spent within West Cumbria is broadly appropriate and could be sustained in the future.
- 8.10 Based on the existing market share, we estimate that £329.4m of convenience goods expenditure which originates within the Study Area is claimed by retailers in Allerdale and Copeland at 2020. We have given consideration¹¹ to the likelihood of any material inflow of expenditure originating outside the Study Area to foodstores located within West Cumbria.
- 8.11 In the 2009 Retail Study visitor spending was estimated using data from the STEAM Report for 2007 prepared by Cumbria Tourism on tourist expenditure in Allerdale and Copeland and then apportioned on a pro-rata basis. We have fortunately been provided with up-to-date STEAM data for both Allerdale and Copeland authority areas and after discussions with the tourism board, have been advised that an appropriate split between convenience and comparison spending is 55% to convenience and 45% to comparison. We then apportion both levels of tourism inflow on a pro-rata basis as previously applied, based on the current turnovers of stores and the likelihood of attracting tourism inflow (i.e. the larger convenience and comparison destinations will also attract the higher proportions of tourism inflow).
- 8.12 In this regard, the STEAM report indicates that in Allerdale there was a total of £25.1m of direct expenditure directed towards shopping from tourists (this figure excludes that which is directed to Keswick) and within Copeland, the report indicates that the respective figure is £31.8m. Taking the 55:45 split between convenience and comparison spend, this equates to a total of £31.3m of convenience inflow and £25.6m of comparison inflow from tourists.
- 8.13 For each convenience goods retail destination, the identified survey derived turnover is compared its expected benchmark performance (which is estimated with reference to company average sales densities and the estimated net sales areas of individual shops). Our assessment assumes a 'goods based' approach, which disaggregates expenditure by sector, as it is important to recognise that

¹¹ With reference to the Study Area boundary, the location of foodstores within it, and the spatial distribution of the population that lies beyond it

major foodstore operators generally also sell some comparison goods, such as clothing, household goods, books and CDs. To account for this, the typical split between convenience and comparison goods provision for each operator has been identified¹² and this multiplier has been applied to the estimated net floorspace¹³ of each foodstore. This provides an indication of the likely floorspace dedicated to the sale of convenience goods at each store and provides for an estimation of convenience goods benchmark turnover.

- 8.14 The calculation of the estimated benchmark turnover of individual stores allows an assessment to be made in respect of individual retailers' trading performance and whether (on an aggregated basis) surplus expenditure exists to support additional floorspace. For smaller shops (where it is more difficult to collate accurate floorspace and sales density data), we assume that stores are trading 'in equilibrium' (i.e. the survey-derived turnover equates to the anticipated benchmark turnover).
- 8.15 Our assessment is summarised below at Table 8.1 and identifies that convenience goods floorspace in West Cumbria has an expected benchmark turnover of £321.9m at 2020, which is below the estimated survey derived turnover including inflow of £355.5m. As such, taken collectively, convenience goods floorspace is 'overtrading' (i.e. its turnover is less than would be expected by reference to company average performance) by £33.5m.
- 8.16 In order to appraise the future need for additional convenience goods floorspace, it is necessary to consider how the performance of stores will be affected by forecast expenditure growth. Accordingly, Table 8.1 also sets out the anticipated increases in expenditure that will be available to convenience goods retailers within West Cumbria, assuming the current convenience goods market share is maintained. We have assumed that the benchmark turnover of floorspace will change going forward in accordance with the forecast changes in floorspace efficiency set out in ERPBN17.
- 8.17 Table 8.1 sets out our estimate that the convenience goods expenditure available to facilities in West Cumbria will decrease to £31.4m at 2025, then a further reduction to £22.6m at 2035.

¹² Generally sourced from GlobalData Convenience and Comparison Goods Sales Densities of Major Grocers 2018, except where we believe that this data is not likely representative of how a store trades in practice. Detailed notes in respect of our approach in calculating net convenience goods sales areas are provided at Table 5 of Appendix 4

¹³ The floorspace of individual stores is derived from Valuation Office Agency records (using typical gross to net multipliers where required)

Table 8.1: Quantitative Need for Convenience Goods Floorspace in West Cumbria

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2020	325.3	360.0	34.6
2025	327.0	354.9	27.9
2030	327.0	349.9	23.0
2035	327.0	346.2	19.2

Source: Table 6a of Appendix I

Notes: Assumes constant market share (88.9%) of Study Area expenditure claimed by facilities in West Cumbria (Copeland and Allerdale Councils); allows for changes in benchmark turnover sales efficiency in accordance with Table 4b of Experian Retail Planner Briefing Note 17

In 2018 prices

- 8.18 In considering the future position in respect of convenience goods needs, it is also necessary to take into consideration commitments and the claim these may make on expenditure. We summarise relevant convenience goods commitments at the below Table 8.2.

Table 8.2: Convenience Goods Commitments in the West Cumbria

Area	Zone	Location	Planning App. Reference	Proposal	Net Conv Sales (sq.m)	Conv Sales Density (£ per sq.m)	Estimate T'over at 2018 (£m)	Status
Copeland	6	Main Street, Hensingham, Whitehaven	4/18/2313 /0F1	Spar convenience store and petrol filling station	224	7,825	1.75	Extant
Allerdale	2	Solway Garage Filling Station, Curzon Street	2/2018/0069	Demolition of existing building and replacement convenience store	224	7,825	1.75	Extant
	5	Land at New Bridge Road, Workington, Cumbria	FUL/2019/0210	Erection of a new discount foodstore with car parking, landscaping and other associated works.	1,521	9,814	14.93	Extant
Allerdale Authority Area							16.68	
Copeland Authority Area							1.75	
West Cumbria					3,132	-	18.43	-

Source: Appendix I

Notes: Estimated sales density generally reflect operator where known or are considered to be typical for the type of development proposed; a threshold of 200 sq.m of net retail sales has been adopted for commitments (account is not made of commitments below this level on the basis that they will not materially impact on shopping patterns and capacity)

In 2018 prices

- 8.19 We estimate that extant retail planning permissions together provide approximately 3,132 sq.m of convenience goods sales floorspace across West Cumbria, and that this floorspace would have a turnover of around £18.43m at 2020 (if it was operational). Convenience goods commitments are

generally limited to relatively small-scale convenience stores and floorspace which is contained within larger mixed-use developments.

8.20 Full details of the assumptions made in estimating the turnover of convenience goods commitments are provided in the notes that accompany Table 6a of Appendix I.

8.21 As such, after an allowance has been made to account for the turnover of commitments, there is limited requirement for any additional convenience goods provision up to 2035, with between 1,300 and 2,200 sq.m of convenience floorspace at 2020, decreasing to between 300 and 600 sq.m at 2030 and 0 to 100 sq.m at 2035.

Table 8.3: Quantitative Need for Convenience Goods Floorspace in West Cumbria After Commitments

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2020	34.6	18.4	16.2	1,300	2,200
2025	27.9	18.6	9.4	700	1,300
2030	23.0	18.7	4.3	300	600
2035	19.2	18.7	0.5	0	100

Source: Appendix I

Notes: Assumes constant market share (89.1%) of Study Area expenditure claimed by facilities in West Cumbria (Copeland and Allerdale Councils); allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 17; minimum floorspace requirement based on an assumed sales density of £11,952 per sq.m at 2018 (which equates to the average sales density of the 'big four' foodstore operators); maximum floorspace requirement based on an assumed sales density of £7,000 per sq.m at 2018 (which is typical figure for discount operators) In 2018 prices

Convenience Goods Capacity in Allerdale Authority Area

8.22 Notwithstanding the above findings, we consider below whether there is any localised quantitative need for additional convenience goods floorspace within the Allerdale and Copeland authority areas.

8.23 As the below Table 8.4 demonstrates, we estimate that convenience goods floorspace in Allerdale claims around £196.6m at 2020, based on an identified market share of 53.2% of all such expenditure that originates within the Study Area. Once the tourism inflow is accounted for, the survey derived turnover in Allerdale increases to £214.1m. This compares to an anticipated benchmark survey of £195.7m; consequently, there is surplus of £18.4m at 2020, which decreases to £9.2m at 2035.

Table 8.4: Quantitative Need for Convenience Goods Floorspace in Allerdale

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2020	199.1	214.1	15.0
2025	200.1	211.1	11.0
2030	200.1	208.1	8.1
2035	200.1	205.9	5.8

Source: Appendix I

Notes: Assumes constant market share (53.2%) of Study Area expenditure claimed by facilities in Allerdale; allows for changes in benchmark turnover sales efficiency in accordance with Table 4b of Experian Retail Planner Briefing Note 17
In 2018 prices

8.24 We estimate that the identified commitments within Allerdale have a collective turnover of £16.7m at 2020. As Table 8.5 identifies, the commitments eliminate the identified expenditure surplus to 2035. As such, there is no quantitative need for additional convenience goods floorspace in Allerdale over the reporting period.

Table 8.5: Quantitative Need for Convenience Goods Floorspace in Allerdale After Commitments

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2020	15.0	16.7	-1.7	-100	-200
2025	11.0	16.8	-5.8	-500	-800
2030	8.1	16.8	-8.8	-700	-1,200
2035	5.8	16.8	-11.0	-900	-1,500

Source: Appendix I

Notes: Assumes constant market share (21.3%) of Study Area expenditure claimed by facilities in Allerdale; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 17; minimum floorspace requirement based on an assumed sales density of £11,952 per sq.m at 2018 (which equates to the average sales density of the 'big four' foodstore operators); maximum floorspace requirement based on an assumed sales density of £7,000 per sq.m at 2018 (which is typical figure for discount operators)
In 2018 prices

Assessment of Convenience Need on a Settlement Boundary - Allerdale

8.25 Table 8.6 below sets out the residual convenience expenditure capacity in Workington and each of the Key Service Centres in Allerdale taking account of the turnover requirements of the extant commitments for comparison floorspace.

8.26 Table 8.6 only identifies a quantitative need for additional convenience goods floorspace within the Cockermouth settlement area. This is in part due the overtrading of existing stores but also the level of tourism inflow apportioned to the area. It is important to note that the new Lidl store is not identified to be trading at the level which we would expect and consider this is likely due to the fact

that the store needs time to 'bed-in'. It is likely that this store will reapportion some of the expenditure within the area and 'level out' some of the overtrading of other stores.

8.27 Whilst there is a quantitative need, the provision appears to be good, particularly for a town of Cockermouth's size and any future proposals for additional convenience floorspace should be directed towards the town centre and perhaps be more concentrated on enhancing the independent role of the centre in the first instance.

Table 8.6: Quantitative Need for Convenience Goods Floorspace in Allerdale's Town and Key Service Centres

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
Workington					
2020	-12.5	14.9	-27.4	-2,200	-3,700
2025	-14.6	15.0	-29.6	-2,300	-4,000
2030	-16.1	15.0	-31.1	-2,500	-4,200
2035	-17.2	15.0	-32.2	-2,500	-4,300
Aspatria					
2020	-5.3	0.0	-5.3	-400	-700
2025	-5.4	0.0	-5.4	-400	-700
2030	-5.4	0.0	-5.4	-400	-700
2035	-5.5	0.0	-5.5	-400	-700
Cockermouth					
2020	16.0	0.0	16.0	1,300	2,200
2025	15.1	0.0	15.1	1,200	2,000
2030	14.4	0.0	14.4	1,100	1,900
2035	13.8	0.0	13.8	1,100	1,900
Maryport					
2020	-1.4	1.8	-3.1	-200	-400
2025	-1.7	1.8	-3.5	-300	-500
2030	-1.9	1.8	-3.7	-300	-500
2035	-2.1	1.8	-3.9	-300	-500
Silloth					
2020	-1.5	0.0	-1.5	-100	-200
2025	-1.6	0.0	-1.6	-100	-200
2030	-1.6	0.0	-1.6	-100	-200
2035	-1.6	0.0	-1.6	-100	-200
Wigton					
2020	0.3	0.0	0.3	0	0
2025	0.1	0.0	0.1	0	0
2030	0.0	0.0	0.0	0	0
2035	-0.2	0.0	-0.2	0	0

In 2018 prices

Convenience Goods Capacity in Copeland

8.28 Our assessment indicates that convenience goods facilities in Copeland overtrade. Table 8.6 identifies that convenience goods floorspace in Copeland claims around £132.1m at 2020, based on an identified market share of 35.7% of all such expenditure that originates within the Study Area. When the tourism inflow is accounted for, the available expenditure increases to £145.9m. This compares to an anticipated benchmark turnover of £126.3m. As such, a surplus of convenience expenditure of £19.6m is therefore apparent at 2020. Assuming the convenience goods facilities in Copeland maintain their existing market share over the reporting period to 2035, we estimate that an expenditure surplus of £16.9m will be apparent by 2025, decreasing to £14.9m at 2030, and then to £13.4m at 2035.

Table 8.7: Quantitative Need for Convenience Goods Floorspace in Copeland

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2020	126.3	145.9	19.6
2025	126.9	143.8	16.9
2030	126.9	141.8	14.9
2035	126.9	140.3	13.4

Source: Appendix I

Notes: Assumes constant market share (47.2%) of Study Area expenditure claimed by facilities in Copeland; allows for changes in benchmark turnover sales efficiency in accordance with Table 4b of Experian Retail Planner Briefing Note 17 In 2018 prices

8.29 We estimate that identified convenience goods commitments in Copeland would have a convenience turnover of £2.0m at 2020 if operational at 2020.

Table 8.8: Quantitative Need for Convenience Goods Floorspace in Copeland After Commitments

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2020	19.6	2.0	17.7	1,400	2,400
2025	16.9	2.0	15.0	1,200	2,000
2030	14.9	2.0	12.9	1,000	1,700
2035	13.4	2.0	11.4	900	1,500

Source: Appendix I

Notes: Assumes constant market share (47.2%) of Study Area expenditure claimed by facilities in Copeland; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 17; minimum floorspace requirement based on an assumed sales density of £11,952 per sq.m at 2018 (which equates to the average sales density of the 'big four' foodstore operators); maximum floorspace requirement based on an assumed sales density of £7,000 per sq.m at 2018 (which is typical figure for discount operators) In 2018 prices

- 8.30 As the above Table 8.8 demonstrates, even when accounting for commitments, we have identified a floorspace requirement of between 1,200 and 2,000 sq.m at 2025 which decreases to between 900 and 1,500 sq.m by 2035. We comment on the need for additional facilities within Copeland more at Section 11, but do consider that the Council does have an opportunity to promote an appropriate town or edge of centre site in the context of Whitehaven in particular (being the principal centre in Copeland), which could in turn benefit the overall centre's performance if it were situated in a suitable location in the context of the town centre.
- 8.31 In this regard, it would be important to ensure that any potential site is suitably located to bring with it wider positive benefits through the encouragement of linked-trips and additional footfall into the centre, whilst ensuring it does not harm existing operators in Whitehaven town centre.
- 8.32 In identifying suitable sites for new foodstore developments, discount foodstores in particular (and indeed, other foodstores of a similar scale) typically seek sites of 0.6ha or above to accommodate a standalone store, with adjacent parking and servicing. We note that the Council is exploring the promotion of a number of sites within and on the edge of Whitehaven town centre which measure between 0.1ha and 1ha, some of which are in active use and their availability are therefore unknown. In any event, should a site be available and suitable and can be assembled which is within easy walking distance of the town centre, with good pedestrian linkages possible, then this should be explored in more detail. Such areas include the land at Ginns, other commercial sites along Preston Street to the south of the town centre and opportunity sites to the north of the centre in proximity to the dock and Tesco store. In reviewing the potential suitability of sites, we would advise that the Council also considers the detailed pedestrian and cycle links between the primary shopping area and wider town centre and any edge of centre site, and that this should be a key consideration in assembling a site.

Assessment of Convenience Need on a Settlement Boundary Basis – Copeland

- 8.33 Table 8.9 below sets out the residual convenience expenditure capacity in Whitehaven and each of the Key Service Centres in Copeland taking account of the turnover requirements of the extant commitments for comparison floorspace.
- 8.34 As we can see from Table 8.9, the only settlement within which we identify a significant quantitative need for additional convenience floorspace is Whitehaven town centre, which reflects our conclusions

set out above. A smaller quantitative need for additional convenience floorspace is noted at Millom town centre.

8.35 In this regard, the capacity is identified due to the current over-trading of floorspace within the town, along with the inflow of expenditure from tourists and indeed, other short-stay shoppers (workers etc). As stated above, we are of the view that there is some capacity in Whitehaven to support an additional store which would not be to the detriment of the town centre and which could instead seek to redistribute some of the over-trading of the existing stores. It is important however, that any future convenience floorspace is directed towards sites in or on the edge of Whitehaven town centre to encourage linked-trips and the associated economic benefits generated by a development of this nature.

Table 8.9: Quantitative Need for Convenience Goods Floorspace in Copelands' Town and Key Service Centres

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
Whitehaven					
2020	28.3	2.0	26.3	2,100	3,600
2025	26.3	2.0	24.3	1,900	3,300
2030	24.7	2.0	22.7	1,800	3,100
2035	23.5	2.0	21.5	1,700	2,900
Cleator Moor					
2020	-5.1	0.0	-5.1	-400	-700
2025	-5.3	0.0	-5.3	-400	-700
2030	-5.4	0.0	-5.4	-400	-700
2035	-5.5	0.0	-5.5	-400	-700
Egremont					
2020	-3.5	0.0	-3.5	-300	-500
2025	-3.7	0.0	-3.7	-300	-500
2030	-3.8	0.0	-3.8	-300	-500
2035	-3.9	0.0	-3.9	-300	-500
Millom					
2020	7.1	0.0	7.1	600	1,000
2025	6.8	0.0	6.8	500	900
2030	6.6	0.0	6.6	500	900
2035	6.4	0.0	6.4	500	900

Notes: Assumes constant market share (47.2%) of Study Area expenditure claimed by facilities in Copeland; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 17; minimum floorspace requirement based on an assumed sales density of £11,952 per sq.m at 2018 (which equates to the average sales density of the 'big four' foodstore operators); maximum floorspace requirement based on an assumed sales density of £7,000 per sq.m at 2018 (which is typical figure for discount operators)
In 2018 prices

Capacity for Future Comparison Goods Floorspace

- 8.36 Our methodology in calculating comparison goods capacity deviates from that employed in respect of convenience goods. This is because it is difficult to accurately estimate a benchmark turnover for comparison goods floorspace, both because of the number of units involved (which are occupied by a wide variety of retailers), and due to the variation in the trading performance of floorspace depending on its location, the character of the area and the nature of the catchment.
- 8.37 As a consequence, we adopt the position for comparison goods floorspace that it is trading 'at equilibrium' at base year 2020 (i.e. our survey derived turnover including the tourism inflow estimate effectively equates to the benchmark trading performance). We therefore assume that there is a nil quantitative need for any additional comparison goods floorspace across the Study Area and two authority areas at 2020. Going forward, we again assume that the performance of comparison goods facilities will be commensurate with the identified market share currently claimed by such provision within West Cumbria.
- 8.38 The £355.9m of comparison goods expenditure that originates the Study Area and is claimed by facilities within West Cumbria equates to a market share of 72.2% of all such comparison goods expenditure. By making provision for inflow and 'rolling forward' this market share, our assessment estimates that existing facilities within West Cumbria will attract £445.5m at 2025, increasing to £511.5m at 2030, and then to £584.4m at 2035. As Table 8.10 sets out, given forecast increases in comparison goods expenditure and allowing for annual forecast changes in the productivity of existing floorspace, we estimate that, at 2025, there will be an expenditure deficit of -£24.2m, decreasing to -£37.4m by 2035.

Table 8.10: Quantitative Need for Comparison Goods Floorspace in West Cumbria

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2020	379.2	379.2	0.0
2025	445.5	421.4	-24.2
2030	511.5	484.0	-27.6
2035	584.4	547.0	-37.4

Source: Appendix I

Notes: Assumes constant market share (72.2%) of Study Area expenditure claimed by facilities in West Cumbria (Copeland and Allerdale Councils); allows for changes in benchmark turnover sales efficiency in accordance with Table 4b of Experian Retail Planner Briefing Note 17

8.39 Once more, the above assessment does not take into consideration existing commitments and their claim on the identified expenditure surplus. Table 8.11 summarises current extant planning permissions that provide for additional comparison goods floorspace. We estimate that these commitments would have a total turnover of £16.5m, if operational at 2020. The commitments take a variety of forms, including retail floorspace associated with larger mixed-use developments, comparison goods retail at foodstore developments, and extensions to large format retail units at retail parks. Very few of the comparison goods commitments relate to 'high street' retail.

Table 8.11: Comparison Goods Commitments in West Cumbria

Area	Zone	Location	Planning App. Reference	Proposal	Net Comp Sales (sq.m)	Comp Sales Density (£ per sq.m)	Estimate T'over at 2020 (£m)	Status
Allerdale	5	Land at St. Helens Business Park, Siddick Road	2/2016/0188	Outline application for a mixed use development park	3,255	3,500	11.4	Extant
	5	Land at Derwent Drive, Derwent Howe Industrial Estate	2/2017/0264	New retail unit	1,454	3,500	5.1	Extant
Allerdale Authority Area					4,709		16.5	
Copeland Authority Area					-		-	
West Cumbria					4,709		16.5	

Source: Appendix I

Notes: Estimated sales density generally reflect operator where known or are considered to be typical for the type of development proposed; a threshold of 200 sq.m of net retail sales has been adopted for commitments (account is not made of commitments below this level on the basis that they will not materially impact on shopping patterns and capacity) In 2018 prices

8.40 The identified requirement in respect of additional comparison goods floorspace is set out below at Table 8.12.

8.41 In considering comparison goods commitments, it is again relevant to note that the capacity assessment is based on the market share of each local authority area being maintained going forward. We are unaware of any significant proposed development which is likely to have a very significant impact on either authority's future comparison goods market share.

Table 8.12: Quantitative Need for Comparison Goods Floorspace in West Cumbria After Commitments

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2020	0.0	16.5	-16.5	-2,700	-4,700
2025	-24.2	19.4	-43.5	-6,700	-11,600
2030	-27.6	22.2	-49.8	-7,300	-12,500
2035	-37.4	25.4	-62.8	-8,600	-14,700

Source: Appendix I

Notes: Assumes constant market share (72.2%) of Study Area expenditure claimed by facilities in West Cumbria (Copeland and Allerdale Councils); allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 17 minimum floorspace requirement based on an assumed sales density of £6,000 per sq.m at 2018; maximum floorspace requirement based on an assumed sales density of £3,500 per sq.m
In 2018 prices

8.42 However, in considering the above floorspace requirements, it will be appropriate to consider the changes in comparison goods shopping patterns that may arise as a consequence of future development. As such, we recommend that the Council monitors any substantial proposed retail development in neighbouring authorities in order to form a view as to whether it is likely to impact upon future floorspace requirements.

Comparison Goods Capacity in Allerdale

8.43 Our assessment indicates that facilities in Allerdale claim a market share of 55.0% of all comparison goods expenditure generated within the Study Area. This equates to £271.1m at 2020. After allowance is made for an inflow of comparison goods expenditure to the area, the turnover of comparison goods retailers located within the authority area increases marginally to £282.3m at 2020.

8.44 By making provision for inflow and 'rolling forward' the identified market share, our assessment finds that comparison goods facilities in Allerdale will attract an estimated £313.8m at 2025, increasing to £407.4m at 2035. Over the short, medium and long term there is a comparison expenditure deficit, indicating that there is no capacity to support additional comparison floorspace across the plan period.

Table 8.13: Quantitative Need for Comparison Goods Floorspace in Allerdale

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2020	282.3	282.3	0.0
2025	331.8	313.8	-18.0
2030	380.9	360.4	-20.5
2035	435.2	407.4	-27.8

Source: Appendix I

Notes: Assumes constant market share (55.0%) of Study Area expenditure claimed by facilities in Allerdale; allows for changes in benchmark turnover sales efficiency in accordance with Table 4b of Experian Retail Planner Briefing Note 17
In 2018 prices

- 8.45 We estimate that comparison goods commitments in Allerdale would have a turnover of £16.5m, if operational at 2020. As Table 8.14 identifies, once account has been taken of commitments, the expenditure deficit increases further.

Table 8.14: Quantitative Need for Comparison Goods Floorspace in Allerdale after Commitments

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2020	0.0	16.5	-16.5	-2,700	-4,700
2025	-18.0	19.4	-37.4	-5,800	-9,900
2030	-20.5	22.2	-42.8	-6,300	-10,700
2035	-27.8	25.4	-53.2	-7,300	-12,400

Source: Appendix I

Notes: Assumes constant market share (55.0%) of Study Area expenditure claimed by facilities in Allerdale; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 17; minimum floorspace requirement based on an assumed sales density of £6,000 per sq.m at 2018; maximum floorspace requirement based on an assumed sales density of £3,500 per sq.m
In 2018 prices

Assessment of Comparison Need on a Settlement Boundary - Allerdale

- 8.46 Table 8.15 below sets out the residual comparison expenditure capacity in Workington and each of the Key Service Centres in Allerdale taking account of the turnover requirements of the extant commitments for comparison floorspace.
- 8.47 We can see that there is no capacity identified for additional comparison goods floorspace within any of the six settlements in Allerdale's authority area.

Table 8.15: Quantitative Need for Comparison Goods Floorspace in Allerdale's Town and Key Service Centres

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
Workington					
2020	0.0	16.5	-16.5	-2,700	-4,700
2025	-13.5	19.4	-32.9	-5,100	-8,700
2030	-15.4	22.2	-37.6	-5,500	-9,500
2035	-20.9	25.4	-46.3	-6,300	-10,800
Aspatria					
2020	0.0	0.0	0.0	0	0
2025	-0.1	0.0	-0.1	0	0
2030	-0.1	0.0	-0.1	0	0
2035	-0.1	0.0	-0.1	0	0
Cockermouth					
2020	0.0	0.0	0.0	0	0
2025	-2.7	0.0	-2.7	-400	-700
2030	-3.1	0.0	-3.1	-500	-800
2035	-4.2	0.0	-4.2	-600	-1,000
Maryport					
2020	0.0	0.0	0.0	0	0
2025	-0.6	0.0	-0.6	-100	-200
2030	-0.7	0.0	-0.7	-100	-200
2035	-1.0	0.0	-1.0	-100	-200
Silloth					
2020	0.0	0.0	0.0	0	0
2025	-0.1	0.0	-0.1	0	0
2030	-0.1	0.0	-0.1	0	0
2035	-0.2	0.0	-0.2	0	0
Wigton					
2020	0.0	0.0	0.0	0	0
2025	-0.9	0.0	-0.9	-100	-200
2030	-1.0	0.0	-1.0	-100	-300
2035	-1.4	0.0	-1.4	-200	-300

In 2018 prices

Comparison Goods Capacity in Copeland

- 8.48 Our assessment indicates that facilities in Copeland claim a market share of 17.2% of all comparison goods expenditure generated within the Study Area. At 2020, this equates to a turnover of £84.8m. We estimate that inflow will account for a further £12.0m of comparison goods expenditure in Copeland at 2020.

- 8.49 By making provision for inflow and 'rolling forward' the identified market share, our assessment finds that comparison goods facilities in Copeland will attract £96.8m at 2020, increasing to £139.7m at 2035.
- 8.50 After account is taken of the need for existing retailers to improve their trading performance, a comparison goods deficit is identified across the plan period.

Table 8.16: Quantitative Need for Comparison Goods Floorspace in Copeland

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2020	96.8	96.8	0.0
2025	113.8	107.6	-6.2
2030	130.6	123.6	-7.0
2035	149.2	139.7	-9.5

Source: Table 26g of Appendix I

Notes: Assumes constant market share (54.2%) of Study Area expenditure claimed by facilities in Copeland; allows for changes in benchmark turnover sales efficiency in accordance with Table 4b of Experian Retail Planner Briefing Note 16 In 2018 prices

- 8.51 As set out below at Table 8.17, there is no identified capacity to support additional comparison floorspace within Copeland over the plan period.

Table 8.17: Quantitative Need for Comparison Goods Floorspace in Copeland after Commitments

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2020	0.0	0.0	0.0	0	0
2025	-6.2	0.0	-6.2	-1,000	-1,600
2030	-7.0	0.0	-7.0	-1,000	-1,800
2035	-9.5	0.0	-9.5	-1,300	-2,200

Source: Table 26h of Appendix I

Notes: Assumes constant market share (54.2%) of Study Area expenditure claimed by facilities in Copeland; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 17; minimum floorspace requirement based on an assumed sales density of £6,000 per sq.m at 2018; maximum floorspace requirement based on an assumed sales density of £3,500 per sq.m In 2018 prices

Assessment of Comparison Need on a Settlement Boundary – Copeland

- 8.52 Table 8.18 below sets out the residual comparison expenditure capacity in Whitehaven and each of the Key Service Centres in Copeland taking account of the turnover requirements of the extant commitments for comparison floorspace.

8.53 Again, we can see that there is no identified quantitative capacity for additional comparison floorspace within the four settlements of Copeland.

Table 8.18: Quantitative Need for Comparison Goods Floorspace in Copelands’s Town and Key Service Centres

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
Whitehaven					
2020	0.0	0.0	0.0	0	0
2025	-4.7	0.0	-4.7	-700	-1,300
2030	-5.4	0.0	-5.4	-800	-1,400
2035	-7.3	0.0	-7.3	-1,000	-1,700
Cleator Moor					
2020	0.0	0.0	0.0	0	0
2025	-0.3	0.0	-0.3	0	-100
2030	-0.3	0.0	-0.3	0	-100
2035	-0.4	0.0	-0.4	-100	-100
Egremont					
2020	0.0	0.0	0.0	0	0
2025	-0.4	0.0	-0.4	-100	-100
2030	-0.5	0.0	-0.5	-100	-100
2035	-0.7	0.0	-0.7	-100	-200
Millom					
2020	0.0	0.0	0.0	0	0
2025	-0.6	0.0	-0.6	-100	-200
2030	-0.7	0.0	-0.7	-100	-200
2035	-0.9	0.0	-0.9	-100	-200

In 2018 prices

Addressing Quantitative Capacity

8.54 It is important to reiterate that the above capacity assessment is a theoretical exercise, based on forecast changes in population and expenditure. It also takes into consideration Experian’s forecasts in respect of how existing retailers will need to increase their turnover in order to remain viable propositions.

8.55 It is clear that the retail market as a whole is depressed and that centres within the two authority areas have been impacted more than most. In particular, there is an issue in respect of some of both Allerdale’s and Copeland’s centres performing a significantly reduced role (compared with the historic function) and being characterised by very high vacancy rates.

Qualitative Need

- 8.56 As we set out earlier in this section, convenience goods retail facilities in West Cumbria are overtrading when considered as a whole. In examining the performance of specific stores, it is evident that medium-sized discount supermarkets (operated by the likes of Aldi and Lidl) are generally performing better than food superstores relative to their expected benchmark performance.
- 8.57 In this regard, since the previous study was undertaken in 2015, Allerdale has seen the increase in provision of discount operators through the new stores in Maryport and Cockermouth and a refurbished Aldi in Cockermouth. It is clear that the discount convenience market is thriving in Allerdale in particular and the additional stores will have added to the overall consumer choice across West Cumbria.
- 8.58 As set out at Section 2 of this report, both discount operators have substantially improved their share of the national grocery market in recent years. Notwithstanding this, the very strong performance of Aldi foodstores in particular across West Cumbria suggests that this type of foodstore may currently be underprovided for and that the two authorities could expect further planning applications for such uses in the short to medium term (potentially including proposals to extend existing stores). Such planning applications should be considered having regard to the qualitative benefits which may result from the delivery of additional convenience goods retail facilities, but also with regard to the magnitude of the impact arising at any defined centre. In this regard, we also note that there is an extant scheme for a new Lidl store in Workington which will further its representation within West Cumbria.
- 8.59 In terms of the spatial distribution of convenience goods facilities, the region is relatively well served by stores which provide a top-up shopping function. However, it is clear that some of the more rural areas of West Cumbria are lacking in main food destinations and as such, residents are having to travel greater distances to meet their main food shopping needs, or indeed, shop online. Millom is an anomaly to this, with a very well performing Tesco store given it is the only national multiple in the area. Whilst this over-trading would typically hint at a need to increase the offer within the area, given its relatively confined catchment, there is a risk that the introduction of an additional operator in Millom (such as an Aldi or Lidl) could result in a harm to the existing Co-op or Tesco stores, which both serve an important function for the town centre.

- 8.60 It will be appropriate to support proposals for further convenience goods shops in rural areas (where no unacceptable impacts would arise at any defined centre) in order to address shortfalls in provision, provide for improved customer choice, and reduce the need to travel. However, we anticipate that the greatest interest in delivering additional foodstores will arise in the urbanised part of Allerdale and Copeland.
- 8.61 In this regard, there is a clear quantitative need for additional convenience floorspace within both Whitehaven and Cockermouth. Turning to the latter in the first instance, this convenience capacity has been identified due to the current over-trading of existing stores within the settlement and the proportion of inflow of expenditure from tourism spend. Whilst we have identified a quantitative need for floorspace in Cockermouth, we do consider that the overall provision of national multiple grocery operators to be good in the town and that it could be harmful to the town centre to encourage any additional larger national multiple convenience goods operators.
- 8.62 Turning to the identified convenience capacity in Whitehaven, again this is due to both the identified over-trading of existing stores within the settlement, and the level of expenditure inflow from tourism spend. However, we are of the view that unlike Cockermouth, there is an opportunity for an additional, appropriately located foodstore to redistribute some of the over-trading within Whitehaven town centre.
- 8.63 As we set out in more detail above, there are some identified sites on the edge of Whitehaven town centre within the Ginns area and along Preston Street, along with areas to the north of the docks and west of Tesco. In both cases, we are of the view that an allocation should be sufficiently flexible to not only allow for new convenience floorspace provision but also a wider range of commercial and residential uses, which also may support the wider tourism function of the town centre and support the Council's Future High Street ambitions.
- 8.64 Turning to comparison goods, the importance and relative dominance of Workington and to a lesser extent, Whitehaven, as a comparison goods shopping venue (together with the offer available at out of centre retail parks) means that other centres in West Cumbria have a more localised role and function than might otherwise be the case. Indeed, as we identified as Section 7 of this report, the market shares of shopping trips claimed by facilities in West Cumbria is considered broadly

appropriate and indicates that most of the comparison goods shopping needs of both Allerdale and Copeland's residents are met within the area.

- 8.65 Accordingly, whilst centres generally would benefit from improved comparison goods provision in order to help bring vacant stock into active use and improve activity, we do not consider there to be significant qualitative deficiencies in respect of comparison goods shopping in West Cumbria which need to be addressed, particularly through the local plan process.
- 8.66 However, a flexible approach to any future town centre development sites should be adopted, which will enable the local authorities to provide for additional retail floorspace should the opportunity arise, and particularly should this downturn in retail space demand alter in the future. This is particularly the case given the need to repurpose old and outdated retail stock and the potential for edge of centre sites to perhaps better meet the needs of modern operators, whilst town centre floorspace could be regenerated for town centre living and holiday accommodation.

9.0 Assessment of Leisure Capacity

9.1 This Section provides a review of the existing leisure facilities in Allerdale and Copeland, and considers the capacity and provision of leisure facilities, including both commercial leisure and bars and restaurants, in the Study Area in order to make recommendations as to whether the existing level of provision is suitable.

Commercial Leisure: Bingo, Casinos, Cinema and Ten Pin Bowling

9.2 Our approach to the assessment of commercial leisure needs necessarily deviates from our retail methodology, in part because it is difficult to source some of the required information to undertake a similar exercise for the leisure sector¹⁴. In addition, the commercial leisure sector is different to the retail sector; large-scale leisure uses are relatively limited in number and customers often expect to travel at least some distance in order to access them. As such, we believe it is sensible to consider the general appropriateness of provision on a Study Area basis, with reference to the typical number of persons required to support particular uses.

9.3 Our assessment considers the typical population required to support bingo halls, casinos, cinema screens and ten pin bowling alleys, and is based around three key stages. We firstly calculate the expected Study Area¹⁵ and local authority population¹⁶ for the relevant reporting years (2020, 2025, 2030 and 2035).

9.4 We then calculate the number of persons required to support a bingo hall, casinos, cinema screens and bowling alleys nationally, across the UK. We have identified the current level of provision across the UK with reference to the following sources:

- Mintel's Casinos and Bingo UK report (March 2018), which identifies that there are 355 bingo halls and 145 casinos across the UK;
- the UK Cinema Association website¹⁷, which identifies that there are 4,309 cinema screens across the UK; and

¹⁴ Experian does not forecast improvements in sales efficiency for leisure operators, which is a critical element in translating a monetary surplus into a floorspace requirement

¹⁵ Derived from Experian MMG3 data

¹⁶ Derived from ONS 2016-based subnational population projections

¹⁷ www.cinemauk.org.uk, consulted on 1 November 2018

- Mintel’s Ten Pin Bowling UK report (May 2017), which identifies that there are 5,242 bowling lanes across the UK.

9.5 We then apply the respective ratio to the Study Area population in order to gauge the ‘benchmark’ level of provision for each type of provision. We supplement our assessment with an overview of current patterns of commercial leisure trips throughout the Study Area (as identified by the NEMS household survey of February 2020) in order to identify any qualitative deficiencies in provision.

Bingo

9.6 The Study Area accommodates two dedicated bingo halls, these being Opera Bingo on Tangier Street in Whitehaven and Opera Bingo on Ladies’ Walk in Workington. Smaller numbers of respondents indicated that they visit a number of smaller, informal premises across the Study Area. The location of each of these facilities means that at least one bingo hall is considered to be relatively accessible to most Study Area residents.

Table 9.1: Market Share Secured by Bingo Halls

Zone	Bingo Facility	1	2	3	4	5	6	7	8	Total
1	Silloth Town Centre	0.0	0.0	0.0	0.0	0.0	6.8	0.0	0.0	1.8
4	Fletchertown Village Centre	0.0	0.0	0.0	24.3	0.0	0.0	0.0	0.0	0.6
5	Broughton Moor Community Centre, Queens Avenue, Seaton, Workington	0.0	11.6	0.0	0.0	0.0	0.0	0.0	0.0	1.1
	Distington Village Centre	0.0	0.0	0.0	0.0	2.4	0.0	0.0	0.0	1.1
	Moorclose Community Centre, Newlands Lane South, Workington	0.0	0.0	0.0	0.0	2.4	0.0	0.0	0.0	1.1
	Opera Bingo, Ladies’ Walk, Workington	17.2	88.4	100.0	75.7	92.8	34.2	64.2	0.0	68.3
	Workington Town Centre	0.0	0.0	0.0	0.0	2.4	0.0	0.0	0.0	1.1
6	Mirehouse Community Association, Seathwaite Avenue, Whitehaven	0.0	0.0	0.0	0.0	0.0	3.9	0.0	0.0	1.0
	Opera Bingo, Tangier Street, Whitehaven	0.0	0.0	0.0	0.0	0.0	39.6	17.9	0.0	11.6
	Parton Village Hall, Parton, Whitehaven	0.0	0.0	0.0	0.0	0.0	3.9	0.0	0.0	1.0
	Whitehaven Town Centre	0.0	0.0	0.0	0.0	0.0	11.6	0.0	0.0	3.1
7	Thornhill Village Centre	0.0	0.0	0.0	0.0	0.0	0.0	17.9	0.0	0.9
8	Haverigg Village Centre	0.0	0.0	0.0	0.0	0.0	0.0	0.0	56.4	0.8
	Millom Town Centre	0.0	0.0	0.0	0.0	0.0	0.0	0.0	43.7	0.6
Outside Study Area	Buzz Bingo, English Gate Plaza, Botchergate, Carlisle	41.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.0
	Opera Bingo, Denton Street, Carlisle	41.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.0
Total		100.0								

Note: Market share derived from 2020 NEMS household survey ‘weighted and filtered’ results; table includes all destinations provided by household survey respondents

- 9.7 As Table 9.1 identifies, the most popular bingo halls are Opera Bingo on Ladies' Walk in Workington and Opera Bingo on Tangier Street in Whitehaven, which respectively secure 68.3% and 11.6% of trips to play bingo that originate within the Study Area. The market share of trips secured by facilities within the Study Area is considered to be acceptable and reflective of an appropriate level of provision.
- 9.8 Mintel's Casinos and Bingo UK report identifies that there are 355 bingo halls across the UK, which equates to a bingo hall for every 189,380 persons or thereabouts¹⁸. Accordingly, as the below Table 9.2 demonstrates, we estimate that the Study Area population of 170,312 persons could support around 0.9 bingo halls at 2020, with no potential increase to 2035 based on the forecast population of 164,855 persons. Given that there are currently two bingo halls across the Study Area, we do not believe that there is any pressing requirement for further facilities across the period to 2035.

Table 9.2: Bingo Hall Requirement in Study Area

Year	Study Area Population	Typical Population Required to Support Hall	Potential Number of Halls Supported by Study Area	Current Number of Halls	Outstanding Potential Requirement
2020	170,312	189,380	0.9	2	-1.1
2025	168,889	189,380	0.9	2	-1.1
2030	166,990	189,380	0.9	2	-1.1
2035	164,855	189,380	0.9	2	-1.1

Note: Typical population to support bingo hall calculated with reference to the Mintel Casinos and Bingo UK 2018 report and to the ONS 2016 mid-year population estimates for the UK (population at 2018 has been used)

- 9.9 As such, even when considering the additional demand created as a result of the tourism inflow, we do not believe that there is any requirement to plan for additional bingo hall provision across the plan period to 2035. Furthermore, in considering the potential need for additional bingo facilities, it should also be noted that the sector has been significantly affected by the ban on smoking in enclosed workplaces that came into force in 2007 as a consequence of the Health Act 2006. Subsequent to the Act being enforced, new bingo hall openings are a rare event and we consider it highly unlikely that there will be any need for additional provision in the Study Area in the foreseeable future.

¹⁸ Based on the ONS 2018 mid-year population estimates for the UK, England and Wales, Scotland and Northern Ireland, which identifies a UK population of 67,229,855 persons at 2018

Casinos

9.10 The Study Area accommodates two casinos, Admiral Casino on King Street in Whitehaven and Admiral Casino on Ivison Lane in Workington. The household survey results identify a number of trips outside of the Study Area to visit casinos. The household survey suggests that the most popular destinations for visiting casinos are Blackpool town centre, Workington town centre and Glasgow city centre, which respectively secure 32.7%, 20.3% and 20.2% of trips to casinos that originate within the Study Area.

Table 9.3: Market Share Secured by Casinos

Zone	Casino	1	2	3	4	5	6	7	8	Total
5	Workington Town Centre	0.0	70.7	0.0	0.0	0.0	0.0	0.0	0.0	20.3
Outside Study Area	Blackpool Town Centre	0.0	0.0	0.0	0.0	100.0	0.0	0.0	0.0	32.7
	Glasgow City Centre	0.0	0.0	0.0	0.0	0.0	75.7	0.0	0.0	20.2
	Newcastle-upon-Tyne City Centre	0.0	29.3	0.0	0.0	0.0	0.0	0.0	0.0	8.4
	Abroad	0.0	0.0	0.0	100.0	0.0	24.3	100.0	0.0	18.3
Total		100.0								

Note: Market share derived from 2020 NEMS household survey 'weighted and filtered' results; table includes all destinations provided by household survey respondents

9.11 Mintel's Casinos and Bingo UK report identifies that there are 145 casinos across the UK, which equates to a casino for every 463.654 persons or thereabouts¹⁹. As the below Table 9.4 identifies, we estimate that the Study Area could support around 0.4 casino at 2020, with no potential increase to 2035 based on the forecast population of 164,855 persons. Given that there are already two casinos in the Study Area, we do not believe that there is any theoretical capacity to support additional provision.

Table 9.4: Casino Requirement in Study Area

Year	Study Area Population	Typical Population Required to Support Casinos	Potential Number of Casinos Supported by Study Area	Current Number of Casinos	Outstanding Potential Requirement
2020	170,312	463,654	0.4	2	- 1.6
2025	168,889	463,654	0.4	2	- 1.6
2030	166,990	463,654	0.4	2	- 1.6
2035	164,855	463,654	0.4	2	- 1.6

Note: Typical population to support bingo hall calculated with reference to the Mintel Casinos and Bingo UK 2018 report and to the ONS 2016 mid-year population estimates for the UK (population at 2018 has been used)

¹⁹ Based on the ONS 2018 mid-year population estimates for the UK, England and Wales, Scotland and Northern Ireland, which identifies a UK population of 67,229,855 persons at 2018

Cinemas

- 9.12 There are four permanent cinemas within the Study Area at the time of the household survey (The Plaza, Dunmail Park Shopping Centre, Workington, The Gaiety Cinema, Whitehaven, Alhambra Cinema, Keswick, The Kirkgate Centre, Cockermouth).
- 9.13 Collectively, the provision provides for most cinema-goers needs, with the multiplex cinemas catering for mainstream tastes, and the smaller cinemas having a wider remit which includes showing a greater number of independent films. In total, the four cinemas provide a total of nine screens.

Table 9.5: Market Share Secured by Cinema

Zone	Cinema	1	2	3	4	5	6	7	8	Total
3	The Kirkgate Centre, Kirkgate, Cockermouth	1.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1
4	Alhambra Cinema, St. John's Street, Keswick	0.0	1.4	15.6	57.6	1.2	0.0	1.0	0.0	6.3
5	The Plaza, Dunmail Park Shopping Centre, Siddick Road, Workington	43.7	97.1	83.0	26.7	96.8	65.3	75.6	7.6	70.9
6	The Gaiety Cinema, Tangier Street, Whitehaven	0.0	0.0	0.0	0.0	0.0	33.7	22.3	0.0	10.4
8h	Broughton-in-Furness Film Club, Victory Hall, Station Road, Broughton-in-Furness	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1.7	0.1
Outside Study Area	All others	4.1	1.4	1.4	4.7	0.0	1.1	1.0	90.6	5.7
	Vue Cinema, Botchergate, Carlisle	51.0	0.0	0.0	11.0	2.1	0.0	0.0	0.0	6.4
Total		100.0								

Note: Market share derived from 2020 NEMS household survey 'weighted and filtered' results; table includes all destinations provided by household survey respondents

- 9.14 The UK Cinema Association website estimates that there were 4,309 cinema screens in the UK at 2017, which equates to one screen for every 15,602 persons or thereabouts. On this basis, we estimate that the Study Area population could support around 10.9 cinema screens at 2020, decreasing to approximately 10.6 screens at 2035.
- 9.15 As Table 9.6 demonstrates, we believe that there are currently nine permanent cinema screens within the Study Area and that there is a theoretical surplus of 1.9 cinema screens at 2020, decreasing to 1.6 surplus screens at 2035. However, given the importance of protecting the existing facilities, we do not anticipate the need to plan for additional cinema developments across the plan period. Although we recommend that further discussions with cinema operators are undertaken to understand the market for an additional facility within the Study Area, and Whitehaven in particular.

Table 9.6: Cinema Screens Requirement in Study Area

Year	Study Area Population	Typical Population Required to Support Screen	Potential Number of Screens Supported by Study Area	Current Number of Screens	Outstanding Potential Requirement
2020	170,312	15,602	10.9	9	1.9
2025	168,889	15,602	10.8	9	1.8
2030	166,990	15,602	10.7	9	1.7
2035	164,855	15,602	10.6	9	1.6

Note: Typical population to support bingo hall calculated with reference to the Mintel Casinos and Bingo UK 2018 report and to the ONS 2016 mid-year population estimates for the UK (population at 2018 has been used)

Ten Pin Bowling

- 9.16 The Study Area accommodated a single ten pin bowling alley at the time of the household survey, this being Eclipse Leisure Centre on Derwent Street in Workington. As the below Table 9.7 identifies, this facility attracted the significant majority (79.9%) of all trips to bowling alleys that originate within the Study Area.

Table 9.7: Market Share Secured by Ten Pin Bowling Alley

Zone	Bingo Facility	1	2	3	4	5	6	7	8	Total
1	Stanwix Park Holiday Centre, Greenrow Meadows, Silloth, Wigton	21.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.3
5	Eclipse Leisure Centre, Derwent Street, Workington	16.0	100.0	78.9	55.2	97.5	100.0	100.0	50.0	79.9
Outside Study Area		59.3	0.0	21.1	44.8	2.5	0.0	0.0	0.0	15.3
	Center Parcs, Whinfell Forest, Penrith	3.6	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6
	Hollywood Bowl, Middlebrook Retail & Leisure Park, The Linkway, Horwich, Bolton	0.0	0.0	0.0	0.0	0.0	0.0	0.0	50.0	0.9
Total		100.0								

Note: Market share derived from 2020 NEMS household survey 'weighted and filtered' results; table includes all destinations provided by household survey respondents

- 9.17 Mintel's Ten Pin Bowling UK report identifies that there are 5,242 ten pin bowling lanes across the UK, which equates to a bingo hall for every 12,825 persons or thereabouts. Accordingly, we estimate that the Study Area could support around 13.3 bowling lanes at 2020, decreasing to around 12.9 lanes at 2035. This suggests a theoretical surplus of 1.3 bowling lanes at 2020, decreasing to 0.9 bowling lanes at 2035. As such, we do not believe that is any quantitative requirement to introduce any further bowling alleys within the Study Area in the period to 2035.

Table 9.8: Ten Pin Bowling Lanes Requirement in Study Area

Year	Study Area Population	Typical Population Required to Support Bowling Lane	Potential Number of Bowling Lanes Supported by Study Area	Current Number of Bowling Lanes	Outstanding Potential Requirement
2020	170,312	12,825	13.3	12	1.3
2025	168,889	12,825	13.2	12	1.2
2030	166,990	12,825	13.0	12	1.0
2035	164,855	12,825	12.9	12	0.9

Note: Typical population to support a bowling lane calculated with reference to the Mintel Ten Pin Bowling UK 2017 report and to the ONS 2017 mid-year population estimates for the UK (population at 2018 has been used)

Commercial Leisure: Allerdale

Bingo

9.18 Mintel’s Casino and Bingo UK 2018 report identifies that there is approximately one bingo hall for every 189,380 persons or thereabouts. As such, we estimate that the Allerdale Authority Area could theoretically support less than one bingo hall at 2020.

9.19 At present, there is one formal bingo hall in Allerdale (the Opera Bingo on Ladies’ Walk in Workington), along with a number of informal premises across the authority area. As such, even when considering the additional demand created as a result of the tourism inflow, we do not believe that there is any requirement to plan for additional bingo hall provision across the plan period to 2035.

Table 9.9: Bingo Hall Requirement in Allerdale Authority Area

Year	Allerdale Authority Area Population	Typical Population Required to Support Hall	Potential Number of Halls Supported by Allerdale	Current Number of Halls	Outstanding Potential Requirement
2020	99,690	189,380	0.5	1	-0.5
2025	99,747	189,380	0.5	1	-0.5
2030	99,368	189,380	0.5	1	-0.5
2035	98,764	189,380	0.5	1	-0.5

Note: Typical population to support bingo hall calculated with reference to the Mintel Casinos and Bingo UK 2018 report and to the ONS 2018 mid-year population estimates for the UK, England and Wales, Scotland and Northern Ireland

Cinema

- 9.20 On the basis that the UK can support approximately one cinema screen for every 15,602 persons or thereabouts, we estimate that the Allerdale Authority Area population could support around 6.4 cinema screens at 2020, decreasing to 6.3 at 2035. There are a number of permanent cinemas within the Allerdale Authority Area, including The Plaza at Dunmail Park in Workington, The Kirkgate Centre in Cockermouth and Alhambra Cinema in Keswick. These facilities provide a total of eight cinema screens.
- 9.21 Table 9.10 below indicates that there is no outstanding requirement within the Allerdale Authority Area over the plan period. However, it is felt that a number of residents within Copeland may look to facilities in Allerdale, particularly at Dunmail Park in Workington, for cinema facilities. However, notwithstanding this there is no noted requirement for additional facilities in Allerdale.

Table 9.10: Cinema Screen Requirement in Allerdale Authority Area

Year	Allerdale Authority Area Population	Typical Population Required to Support Cinema Screen	Potential Number of Cinema Screens Supported by Allerdale	Current Number of Cinema Screens	Outstanding Potential Requirement
2020	99,690	15,602	6.4	8	-1.6
2025	99,747	15,602	6.4	8	-1.6
2030	99,368	15,602	6.4	8	-1.6
2035	98,764	15,602	6.3	8	-1.7

Note: Typical population to support a cinema screen calculated with reference to data provided by the UK Cinema Association website and to the ONS 2018 mid-year population estimates for the UK, England and Wales, Scotland and Northern Ireland

Ten Pin Bowling

- 9.22 Mintel's Ten Pin Bowling UK 2017 report identifies that there are 5,242 ten pin bowling lanes across the UK, which equates to a bowling lane for every 12,825 persons or thereabouts. As such we identify that the Allerdale Authority Area could support 7.8 bowling lanes at 2020. There is one formal ten-pin bowling facility within Allerdale, at Eclipse Leisure Centre on Derwent Street in Workington. We therefore do not recommend that additional ten-pin bowling facilities are planned for within the development plan. However, should applications for additional facilities be forthcoming, these should be assessed on a case by case basis against the relevant policy tests.

Table 9.11: Ten Pin Bowling Lane Requirement in Allerdale Authority Area

Year	Allerdale Authority Area Population	Typical Population Required to Support Bowling Lane	Potential Number of Bowling Lanes Supported by Allerdale	Current Number of Bowling Lanes	Outstanding Potential Requirement
2020	99,690	12,825	7.8	12	-4.2
2025	99,747	12,825	7.8	12	-4.2
2030	99,368	12,825	7.7	12	-4.3
2035	98,764	12,825	7.7	12	-4.3

Note: Typical population to support ten pin bowling alley calculated with reference to the Mintel Ten Pin Bowling UK 2017 report and to the ONS 2018 mid-year population estimates for the UK, England and Wales, Scotland and Northern Ireland

Commercial Leisure: Copeland

Bingo

9.23 Mintel’s Casinos and Bingo UK 2018 report identifies that there are 355 bingo halls across the UK, which equates to a bingo hall for every 189,380 persons or thereabouts²⁰. Accordingly, we estimate that the Copeland Authority Area could theoretically support less than one bingo hall at 2020.

9.24 At present, there is one formal bingo hall in Copeland (the Opera Bingo on Tangier Street in Whitehaven), along with a number of informal premises across the authority area. As such, even when considering the additional demand created as a result of the tourism inflow, we do not believe that there is any requirement to plan for additional bingo hall provision across the plan period to 2035.

Table 9.12: Bingo Hall Requirement in Copeland Authority Area

Year	Copeland Authority Area Population	Typical Population Required to Support Hall	Potential Number of Halls Supported by Copeland	Current Number of Halls	Outstanding Potential Requirement
2020	70,831	189,380	0.4	1	-0.6
2025	69,366	189,380	0.4	1	-0.6
2030	67,822	189,380	0.4	1	-0.6
2035	66,293	189,380	0.4	1	-0.6

Note: Typical population to support bingo hall calculated with reference to the Mintel Casinos and Bingo UK 2018 report and to the ONS 2018 mid-year population estimates for the UK, England and Wales, Scotland and Northern Ireland

²⁰ Based on the ONS 2018 mid-year population estimates for the UK, England and Wales, Scotland and Northern Ireland, which identifies a UK population of 67,229,855 persons at 2018

Cinema

- 9.25 On the basis that the UK can support approximately one cinema screen for every 15,602 persons or thereabouts, we estimate that the Copeland Authority Area population could support around 4.6 cinema screens at 2020, decreasing to 4.3 at 2035. There is one permanent cinema within the Copeland Authority Area, this being the Gaiety Cinema in Whitehaven (which accommodates a single screen and has recently been renovated). There are also additional irregular screenings at the Millom Palladium and the Beggars Theatre, both in Millom centre. The Millom Palladium, for example, houses cinema clubs and parties. Furthermore, residents within Copeland have relatively good access to cinema facilities at Dunmail Park in Workington, which attracts considerable levels of trips from residents in Zones 6 and 7 in particular (65.3% and 75.7% respectively).
- 9.26 Table 9.13 below indicates that there is an outstanding requirement for over three additional screens within Copeland over the plan period. However, given the easy access to existing facilities within Allerdale, it may be that the resident population and commercial market within Copeland and the wider West Cumbria area may not support additional facilities. We recommend that further discussions with cinema operators are undertaken to understand the market for an additional facility within Whitehaven in particular.

Table 9.13: Cinema Screen Requirement in Copeland Authority Area

Year	Copeland Authority Area Population	Typical Population Required to Support Cinema Screen	Potential Number of Cinema Screens Supported by Copeland	Current Number of Cinema Screens	Outstanding Potential Requirement
2020	70,831	15,602	4.6	1	3.6
2025	69,366	15,602	4.5	1	3.5
2030	67,822	15,602	4.4	1	3.4
2035	66,293	15,602	4.3	1	3.3

Note: Typical population to support a cinema screen calculated with reference to data provided by the UK Cinema Association website and to the ONS 2018 mid-year population estimates for the UK, England and Wales, Scotland and Northern Ireland

Ten Pin Bowling

- 9.27 Mintel's Ten Pin Bowling UK 2017 report identifies that there are 5,242 ten pin bowling lanes across the UK, which equates to a bowling lane for every 12,825 persons or thereabouts. Accordingly, we estimate that the Copeland Authority Area could support around 5.6 bowling lanes at 2020. There is

no current formal ten-pin bowling facility within Copeland or indeed, Whitehaven town centre. In this regard, whilst very few new ten pin bowling alleys were built in the early part of this century, the market has picked up in recent years. This upturn in the sector has been partly assisted by a more modern type of offer, which is typically 'in centre' and aimed at those going out in the evening as much as families.

9.28 As such, modern bowling alleys often incorporate other forms of leisure activity (most notably through a strong food and drink offer). Whilst bowling operators have typically sought to 'roll out' this newer model in larger cities, Copeland Council may wish to engage with prospective operators in order to understand the potential of bringing such a use to Whitehaven town centre.

Table 9.14: Ten Pin Bowling Lane Requirement in Copeland Authority Area

Year	Copeland Authority Area Population	Typical Population Required to Support Bowling Lane	Potential Number of Bowling Lanes Supported by Copeland	Current Number of Bowling Lanes	Outstanding Potential Requirement
2020	70,831	12,825	5.6	0	5.6
2025	69,366	12,825	5.5	0	5.5
2030	67,822	12,825	5.4	0	5.4
2035	66,293	12,825	5.3	0	5.3

Note: Typical population to support ten pin bowling alley calculated with reference to the Mintel Ten Pin Bowling UK 2017 report and to the ONS 2018 mid-year population estimates for the UK, England and Wales, Scotland and Northern Ireland

Food and Drink

9.29 Food and drink uses are not typically the subject of a quantitative assessment due to the difficulties in forecasting future growth in the sector over time (and an absence of data relating to how existing operators may need to increase their trading efficiency in the future in order to remain profitable). In addition, most new food and drink uses are relatively small-scale and can be readily accommodated within a centre (through the reoccupation or refurbishment of existing premises) without the need for any planning policy-led intervention. As such, our consideration of the current food and drink offer within the two authority areas is a qualitative assessment based on the strength of the current offer and the opportunities that may exist to attract further operators particularly in Workington and Whitehaven.

Table 9.15: Market Share of Restaurant Trips

Zone	Venue	1	2	3	4	5	6	7	8	Total
1	Wigton Town Centre	16.2	2.7	0.0	2.7	0.0	0.0	0.0	0.0	2.3
	Other, Zone 1	8.8	0.0	0.0	0.0	0.5	0.5	0.0	0.0	1.2
2	Maryport Town Centre	0.0	19.8	1.0	0.0	0.0	0.0	0.0	0.0	2.2
	Other, Zone 2	0.0	1.1	0.0	0.0	0.0	0.0	0.0	0.0	0.1
3	Cockermouth Town Centre	10.7	41.8	67.2	9.9	26.4	11.2	8.3	0.0	22.8
	Other, Zone 3	1.1	1.0	1.7	1.0	1.7	0.0	0.0	0.0	0.8
4	Keswick Town Centre	2.3	2.9	10.8	61.3	2.9	2.6	5.0	1.1	7.8
	Other, Zone 4	1.1	0.0	0.0	7.4	0.0	0.0	0.0	2.2	0.8
5	Workington Town Centre	1.9	12.9	10.3	0.0	48.2	16.5	3.9	4.5	16.7
	Other, Zone 5	0.0	3.0	2.0	0.0	5.8	2.3	1.8	0.0	2.4
6	Whitehaven Town Centre	0.0	1.0	1.0	4.0	3.9	51.4	39.3	0.0	17.5
	Other, Zone 6	0.0	0.0	0.0	0.0	0.0	1.5	1.6	0.0	0.5
7	Other, Zone 7	0.0	1.0	0.0	1.0	2.0	0.6	32.1	8.9	4.9
8	Millom Town Centre	0.0	0.0	0.0	0.0	0.0	0.0	0.0	37.9	2.1
	Other, Zone 8	0.0	0.0	0.0	0.0	0.5	0.0	0.0	7.4	0.5
Outside Study Area	Carlisle City Centre	43.4	9.7	1.0	6.4	0.5	6.6	0.0	1.1	8.2
	Other, Outside Study Area	14.6	3.4	5.0	6.3	7.4	6.9	6.5	36.9	8.9
	Abroad	0.0	0.0	0.0	0.0	0.0	0.0	1.4	0.0	0.2
Total		100.0								

Note: Market share derived from 2020 NEMS household survey 'weighted and filtered' results; table includes all inside and outside the Study Area that secure a market share located within the Study Area and those outside that secure a total market share of at least 2.0%

9.30 Table 9.15 indicates that the centres of Whitehaven, Workington and Cockermouth collectively attract a significant proportion of trips to restaurants. The performance of these centres is considered to be encouraging, particularly as Cockermouth is substantially smaller than both Whitehaven and Workington. However, it should be noted that a number of trips (17.3% in total) are to destinations outside of the study area. As such there is some scope to improve the food and drink offer in the Study Area further in order to ensure that a greater proportion of restaurant trips are retained within the Study Area.

9.31 Analysis of the survey results in respect of trips to visits pubs, bars and nightclubs, indicates that respondents generally visit a wider range of venues in order to drink and socialise than they do to dine. As such, venues typically secure a lower market share of trips to pubs, bars and nightclubs compared to their market share of restaurant trips. However, again Whitehaven, Workington and Cockermouth are notable exceptions to this trend, respectively securing 21.6%, 19.8% and 13.8% of respondents trips to pubs, bars and nightclubs. Although the Cockermouth's market share in respect of restaurant trips represents a higher figure, for both Whitehaven and Workington this figure is actually somewhat greater.

Table 9.16: Market Share of Trips to Pubs, Bars and Nightclubs

Zone	Venue	1	2	3	4	5	6	7	8	Total
1	Wigton Town Centre	19.6	0.0	1.8	2.6	0.0	0.0	0.0	0.0	2.2
	Other, Zone 1	21.4	0.0	1.4	0.0	0.0	0.8	0.0	0.0	2.3
2	Maryport Town Centre	0.0	47.6	3.8	0.0	0.0	0.0	0.0	0.0	5.5
	Other, Zone 2	1.4	4.0	0.0	0.0	0.6	0.0	1.4	0.0	0.9
3	Cockermouth Town Centre	0.0	31.9	63.6	8.0	11.7	1.8	0.0	0.0	13.8
	Other, Zone 3	0.0	0.0	13.7	2.2	1.1	0.0	0.0	0.0	1.9
4	Keswick Town Centre	4.2	0.0	4.2	71.7	0.0	2.4	5.5	0.0	6.3
	Other, Zone 4	0.0	0.0	0.0	3.5	0.0	0.0	0.0	1.5	0.3
5	Workington Town Centre	3.5	15.3	8.2	0.0	67.9	6.8	1.4	0.0	19.8
	Other, Zone 5	0.0	0.0	3.2	0.0	5.2	2.9	1.1	0.0	2.3
6	Whitehaven Town Centre	1.4	0.0	0.0	0.0	5.9	71.2	28.4	0.0	21.6
	Other, Zone 6	0.0	0.0	0.0	0.0	0.0	2.3	1.4	0.0	0.7
7	Egremont Town Centre	0.0	0.0	0.0	0.0	0.0	0.0	22.8	0.0	2.7
	Other, Zone 7	0.0	1.3	0.0	0.0	3.1	2.9	35.5	0.0	5.7
8	Millom Town Centre	0.0	0.0	0.0	0.0	0.0	0.0	0.0	35.8	2.0
	Other, Zone 8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	31.2	1.7
Outside Study Area	Carlisle City Centre	38.9	0.0	0.0	6.3	0.0	3.9	0.0	0.0	4.9
	Other, Outside Study Area	9.7	0.0	0.0	5.7	3.3	5.1	2.7	31.6	5.3
	Abroad	0.0	0.0	0.0	0.0	1.1	0.0	0.0	0.0	0.3
Total		100.0								

Note: Market share derived from 2020 NEMS household survey 'weighted and filtered' results; table includes all inside and outside the Study Area that secure a market share located within the Study Area and those outside that secure a total market share of at least 2.0%

9.32 It is also interesting to note that, in contrast to restaurant trips, a smaller proportion of respondents' trips to pubs, bars and nightclubs were to destinations outside of the study area (10.5% in total). Again, this likely reflects the tendency for respondents to visit a wider range of venues to drink and socialise than they do to dine.

Other Leisure Uses

9.33 In recent years, the presence of leisure facilities such as trampolining centres, climbing walls and soft-play centres have increased substantially across the UK.

9.34 In an increasingly competitive retail environment, centres are seeking more adventurous and exciting leisure operators to provide differentiation and draw consumers in. Trampoline parks for example, offer a broad range of activities, from children's parties, fitness classes, corporate team building activities, to teen and adult club nights, whilst most also have onsite cafés. The same can be said for climbing walls and soft-play centres, where a wide range of activities are present alongside the main leisure facilities.

- 9.35 Examples of other leisure uses include Billy Bears Fun Centre at Haig Enterprise Park in Whitehaven, Funtastic, Planet Play and Monkey Madhouse within and on the edge of Workington town centre. which all offer indoor children's soft play, the Wave Centre in Maryport which provides an indoor 'clip n clime' amongst other leisure activities and Lake Escapes Ltd on Stanley Street in Workington, providing an 'escape room' leisure activity for a range of ages.
- 9.36 As is the case in West Cumbria, these facilities generally occupy relatively large (500 sq.m to 2,500 sq.m) units with high ceiling heights and are often found in former employment or retail premises on business parks and retail parks. As such, applications to change the use of the premises to allow the use by Class D2 operators if the units are located outside of the defined town centre, will need to be assessed against the relevant main town centre use planning policies of the sequential and impact tests.
- 9.37 However, we also note that there are some family themed centres within the defined centres within Allerdale and Copeland which act to draw families into the centres and if such uses can be retained within defined centres, there will be knock-on benefits to the wider offer through increased linked-trips. Such uses could be provided as part of a mixed-use leisure-led development, providing other food and drink uses alongside to encourage longer stays.

Conclusion

- 9.38 We believe that the two authority areas are generally well provided for in respect of bingo halls, casino and cinemas and ten pin bowling alleys (these being the commercial leisure uses that require a substantial site to accommodate them and therefore of particular interest in studies of this nature).
- 9.39 We have identified a potential to increase both the cinema and ten-pin bowling provision within Copeland in particular, but this is likely to be more in respect of 'boutique' style operators and early engagement with potential operators would be key at this stage. We do not envisage, that the commercial interest will be substantial particularly given the current commercial market and the hesitance of future investment until we can be sure of how the market lies.
- 9.40 In terms of the food and drink sector, we believe that significant opportunity exists in respect of the food and drink sector in both Whitehaven and Workington and that any future development

opportunities within or on the edge of the town centres should accommodate a range of units suitable to accommodate both national multiple and independent leisure operators.

- 9.41 Again, this should be led by the commercial market and discussions should take place with key national multiple operators to better understand their current requirements, particularly given the current COVID situation.
- 9.42 Consideration should also be given as to how town centres, particularly Whitehaven and Workington, can be reimagined in order to promote themselves as leisure destinations and to encourage potential operators to utilise the existing event space and under-utilised spaces that these centres hold. This will also help to ensure that town centres offer a variety of reasons for visitors to visit and dwell for longer times, thereby encouraging a greater number of multi-purposes visits and increasing the amount of spend.

10.0 Out of Centre Retail and Leisure

Introduction

- 10.1 We set out below a review of the role, function and current performance of the four principal out of centre retail destinations in West Cumbria, these being principally: Dunmail Retail Park, Derwent Drive Retail Park within the vicinity of Workington, and Whitehaven Bridges Retail Park and Preston Street Retail Park within Whitehaven.
- 10.2 The retail parks provide important facilities to the residents from both Workington and Whitehaven, as well as residents from across West Cumbria, accommodating some retailers who may not be able to locate within any of West Cumbria's town centres due to their specific business model requirements.

Household Survey Results

- 10.3 We first revisit the household survey results in order to consider both the performance of each out of centre venue (in terms of its turnover) and whether the facility meets convenience, non-bulky comparison or bulky comparison goods needs.

Table 10.1: Turnover of Retail Park Destinations

Retail Park	Convenience Goods Turnover (£m)	Non-Bulky Comparison Goods Turnover (£m)	Bulky Comparison Goods Turnover (£m)	Total Comparison Goods Turnover (£m)	Total Turnover (£m)
Dunmail Retail Park	£18.5m	£12.4m	£2.0m	£14.4m	£32.9m
Derwent Drive Retail Park	£38.8m	£14.9m	£41.4m	£56.2m	£95.0m
Whitehaven Bridges Retail Park	£0.6m	£0.4m	£0.2m	£0.6m	£1.2m
Preston Street Retail Park	£30.3m	£1.1m	£0.0m	£1.1m	£31.4m
Total	£88.2m	£28.8m	£43.6m	£72.3m	£160.5m

Source: Convenience and comparison turnovers derived from Appendix 6

Notes: Non-bulky goods include clothing & footwear, small household, CDs, DVDs and Books, chemist goods, and recreational goods; bulky includes electrical goods, furniture, DIY and gardening goods

- 10.4 Table 10.1 indicates that Derwent Drive Retail Park in Workington has the greatest overall turnover (£95.0m at 2020) in terms of expenditure arising within the Study Area, followed by Dunmail Retail Park (which has an overall turnover of £32.9m) and Preston Street Retail Park (which has an overall turnover of £31.4m).
- 10.5 Table 10.2 considers the comparison goods market share of the four out of centre destinations, and demonstrates that they collectively claim 10.7% of non-bulky comparison goods Study Area expenditure, and 41.4% of bulky comparison goods expenditure. As such, the four out of centre destinations collectively have lower comparison goods market share (19.4%) than that claimed by the two main town centres of Whitehaven and Workington (50.9%). It is evident that the role of the retail parks is principally to meet bulky comparison and convenience goods needs, and that they generally have a lesser role in respect of non-bulky goods provision.

Table 10.2: Comparison Goods Market Share of Retail Park Destinations

Retail Park	Non-Bulky Comparison Goods 2020	Bulky Comparison Goods 2020	Total Comparison Goods 2020
Dunmail Retail Park	4.6%	1.9%	3.9%
Derwent Drive Retail Park	5.6%	39.3%	15.0%
Whitehaven Bridges Retail Park	0.1%	0.2%	0.2%
Preston Street Retail Park	0.4%	0.0%	0.3%
Total	10.7%	41.4%	19.4%

Source: Derived from the Quantitative Assessment provided at Appendix 6

- 10.6 We set out below a consideration of the composition and role of each of the out of centre destinations, and provide commentary on how the Council should continue to manage out of centre development through appropriate policy mechanisms.

Composition and Role of Dunmail Retail Park

- 10.7 Dunmail Retail Park is an indoor shopping centre located approximately 1.5km north of Washington Square in Workington town centre and the location of Workington's primary shopping area, just off the A596 which connects Workington to Maryport, Carlisle and Whitehaven. The retail park is immediately north of Ling Beck and neighbours Siddick Ponds Nature Reserve to the east. To the west of Dunmail retail park are three warehouses run by J Dixon and Son Ltd. Dunmail is located in the broad area of Northside, located north of the River Derwent which separates the retail park from the town centre. The Dunmail Retail park opened in 1988 and has been trading for 31 years.
- 10.8 The retail park is anchored by an ASDA superstore and is home to several national clothes retailers including Topshop, Burton, Dorothy Perkins, Wallis, along with other retailers and leisure service providers such as Dixons, Subway and Costa Coffee. The retail park has 14 units in total and is also the location of Workington's only cinema, the Plaza Cinema, an independent multiplex with six screens.
- 10.9 The below table 10.3 provides a summary of the composition of Dunmail Retail Park, with reference to the sector categorisation used by Experian Goad.
- 10.10 The diverse range of operators with a presence at Dunmail Retail Park suggests that the park is capable of meeting a range of retail needs, including convenience, non-bulky and bulky retail requirements.

Table 10.3: Composition of Dunmail Retail Park

Category	Number of Units	Proportion of Units (%)
Comparison: Department & Variety Store	1	7.1
Comparison: Toys, Games & Hobbies	1	7.1
Comparison: Clothing Store	4	28.6
Convenience: Supermarkets	1	7.1
Leisure Service: Fast Food & Take Away	3	21.4
Leisure Service: Cinema	1	7.1
Retail Service: Beauty Salon	1	7.1
Vacant	2	14.3
Total	14	100.0%

- 10.11 There have been a series of permissions granted at the retail park since its original construction between 1986 and 1988, including that for the extension of the park for the cinema complex (2/2000/0133) re-siting of the car sales workshop and alterations to the stores.
- 10.12 An application to improve the external elevations provide a new entrance, and redesign a number of aspects of the retail park was approved in 2009 (2/2009/0523) bringing the shopping centre up to modern standards.

Composition and Role of Derwent Drive Retail Park.

- 10.13 Derwent Drive retail park is located approximately 1.2km west of Workington Town Centre and the primary shopping area of Washington Square. It is immediately north of Derwent Howe Industrial Estate. The retail park is separated from Clay Flatts Industrial Estate to the east by the railway line. The retail park is separated from the River Derwent by further industrial land.
- 10.14 The retail park is anchored by national retailers such as Morrisons (and associated petrol station), B&Q, Halfords, Pets at Home, Aldi, Currys PC World, Bensons for Beds, Mcdonalds, and Dunelm.
- 10.15 The main retail park in Workington includes a diverse range of operators. The relatively large scale of the retail park is reflected in its overall Study area market share of 15.0%, including a total of 39.3% of bulky comparison market share. This is the greatest market share of any of the out of centre retail parks, and is perhaps reflective of the diverse range of operators found at Derwent Drive Retail Park.

Table 10.4: Composition of Derwent Drive Retail Park

Category	Number of Units	Proportion of Units (%)
Convenience: Supermarkets	3	23.1
Comparison: Carpets & Flooring	1	7.7
Comparison: Discount & Variety Stores	1	7.7
Comparison: Other Comparison Goods	2	7.7
Comparison: Furniture	2	15.4
Leisure service: Fast Food & Take Away	1	15.4
Comparison: Electrical & Other Durable Goods	1	7.7
Retail services: Car repairs	1	7.7
Vacant	1	7.7
Total	13	100.0

- 10.16 The outdoor retail park is the location of 13 units. It is thought that the original application for retail floorspace is application ref. 2/85/0262 dating to 1985 as subsequent applications reference this.
- 10.17 The earliest planning history for retail development at Derwent Drive dates to 1988/1989, when applications were made for increased retail floorspace (2/1989/0340 and 1988/1089). Over the years, several applications to extend units, create mezzanine levels within units, and provide additional units have resulted in the growth of the retail park, including the introduction of Morrison's to the Retail Park in 2007.
- 10.18 Additionally, an application to refurbish the McDonalds unit in line with nation-wide rebranding was approved in 2009 (2/2009/0442).

Composition and Role of Whitehaven Bridges Retail Park

- 10.19 Bridges Retail Park comprises of four units and is located on the edge of the town, approximately 500-600m south-east of King Street and Whitehaven's Primary Shopping Area, off Flatt Walks. It is located immediately south of Morrisons on Flatt Walks and Whitehaven Leisure Centre. Whitehaven Cricket Club and Rugby Union Football Club are located immediately west of the retail park. This recreational and sporting field separates the retail park from Preston Street Retail Park. To the east, across Flatt Walks, is Whitehaven Castle and Castle Park. Immediately south of the site, are industrial workshops off Coach Road, and Saint Begh's Priory and Catholic Junior School. The retail park is technically Whitehaven's only retail park.
- 10.20 The retail park stands on land formerly occupied by Whitehaven Technical College. There were originally 5 units however B&M Home Stores expanded into two units, one previously occupied by Lidl, in 2014.

The retail park includes 215 car parking spaces. At present there is a B&M Home Store, McDonalds, and Carpetright. A 6,144 sq ft unit was vacant during the time of the healthcheck site visits due to the exit of Poundworld from the retail park following its administration in 2018. However, since the visit, it is understood that Greggs and Shoe Zone have now occupied this unit.

Table 10.5: Composition of Bridges Retail Park

Category	Number of Units	Proportion of Units (%)
Comparison: Carpets & Flooring	1	20.0
Comparison: Discount & Variety Stores	1	20.0
Leisure service: Fast Food & Take Away	2	40.0
Vacant	1	20.0
Total	5	100.0

Composition and Role of Preston Street Retail Park

- 10.21 Whilst not a purpose built out of centre retail park, Preston street has attracted a number of large retail units and warrants consideration to ensure a thorough study. It is located approximately 500m south-west of Whitehaven town centre and primary shopping centre, and approximately 150m south of Copeland Council's offices on Catherine Street. There is a royal mail sorting office immediately north of the unit occupied by Aldi. The retail park is immediately west of Whitehaven Cricket and Rugby Union Football Club sports fields, which separates the area from the Bridges Retail Park. To the south of the retail area is a mixture of industrial land (the Pottery Yard and The Old Motor Works) and residential land, along with some grassland.
- 10.22 There are seven units within 150m of the roundabout on Preston Street which comprise of an Aldi, Iceland Foods, Home Bargains, Pet Store, C2C Cycle Guide and Cycle Hire, Enterprise Rent-a-Car, ASDA and Kwik Fit along with ample car parking. The retail park subsequently provides a strong out-of-centre convenience offer.

Table 10.6: Composition of Preston Street Retail Park

Category	Number of Units	Proportion of Units (%)
Convenience: Supermarket	3	42.9
Comparison: Discount and Variety	1	14.3
Comparison: Sports Goods	1	14.3
Retail Service: Car Rental/ Repair Services	2	28.6
Total	6	100.0

Summary and Conclusions

- 10.23 The out of centre retail provision within West Cumbria is varied and focussed around the two main town centres of Workington and Whitehaven. Derwent Drive Retail Park attracts the highest proportion of comparison shopping trips from West Cumbrian residents.
- 10.24 The out of centre Dunmail Retail Park, north of Workington, stands out as unique from the other retail parks assessed as it provides a broad offer which goes beyond 'traditional' retail park provision of offering just bulky goods. Dunmail Retail Park operates as an indoor shopping centre with a number of clothing retailers and Workington's only cinema. However, Dunmail Retail Park attracts a reduced amount of the comparison goods market share compared to Derwent Drive Retail Park (3.9% compared with 15.0%).
- 10.25 Furthermore, it is considered that that better connectivity between Bridge Street Retail Park in Whitehaven with Corkickle train station to the south, along with consideration of how Preston Street retail units could be better connected via pedestrian linkages to the town centre, is required to support the vitality and viability of the offer in the future.
- 10.26 Overall, we consider that West Cumbria is well served by out of centre retail floorspace, which meets the needs of residents through the provision of a range of operators who otherwise would not occupy floorspace within the town centres.
- 10.27 However, it will be important for the Council to continue to monitor applications for the potential expansion of floorspace or relaxation of uses due to the potential implications such applications could have on the health of defined centres within the Region.

11.0 Summary and Recommendations

Introduction

- 11.1 In making recommendations, this section draws together the previous sections of this report, pulling together the key findings from the extensive market research and stakeholder work undertaken and the overarching messages which have been taken account of in formulating strategies for the future of the centres. These recommendations focus on the distribution of identified need within the two authority areas, and the findings from the health assessments of the defined centres.

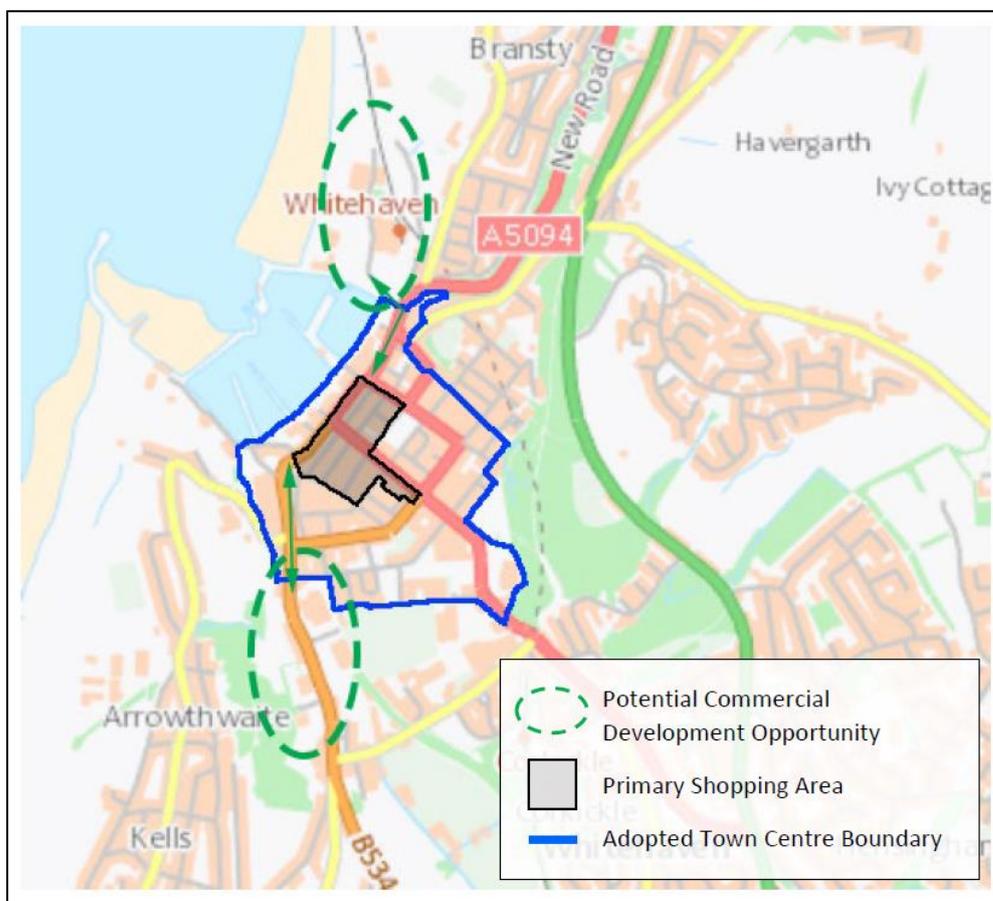
Key Findings: Retail

- 11.2 Across Allerdale and Copeland authority areas, we have identified between 1,300 and 2,300 sq.m of convenience goods capacity at 2020, which reduces to between 0 and 100 sq.m at 2035.
- 11.3 When looking at each individual authority area, our findings indicate that there is no capacity for additional convenience goods floorspace in Allerdale as a whole once commitments have been taken into account. However, we do identify a capacity for additional floorspace of between 1,300 and 2,300 sq.m within Cockermouth based on the level of overtrading of existing stores and the level of tourism expenditure inflow into the area. Whilst there is a theoretical capacity for additional convenience floorspace in Cockermouth, given the relatively new Lidl, we consider it is important to let the store 'bed in' before seeking to increase any convenience provision in the area. Furthermore, it is likely that any additional national multiple convenience goods operator could have a detrimental impact on the town centre offer, and all of the focus should be on the high street offer in the first instance, helping to protect its important role in the local area.
- 11.4 However, within Copeland we do identify a need of between 1,400 and 2,400 sq.m of additional convenience floorspace at 2030 (i.e. looking ten-years ahead as stipulated in the NPPF). This capacity has arisen despite the cautionary forecasts adopted by Experian and the limited population growth across the authority area and is due to the current identified over-trading of facilities in the Study Area. In particular, we note that the Aldi in Whitehaven is identified as substantially overtrading, along with the Morrisons and the Tesco stores.

- 11.5 It follows that there is a clear quantitative deficiency in terms of the convenience goods offer surrounding Whitehaven as identified in the Study, and the delivery of an additional store could assist in achieving wider regenerative aspirations within the town.
- 11.6 It will be important that any new foodstore is brought forward in support of, not to the detriment of Whitehaven town centre. In this regard, an appropriately located store can bring with it a range of positive benefits such as economic regeneration, encouragement of linked-trips and the redevelopment of otherwise key town centre brownfield sites. Having undertaken a search for appropriate town centre sites within Whitehaven, an appropriately sized site which is currently available for redevelopment has not been found. Instead, we consider it more likely that should there be an appetite, it will require a wholesale redevelopment of an otherwise underused site within the town centre to perhaps accommodate a 'metropolitan' style foodstore (i.e. car parking on ground floor and the foodstore on the first floor above). Such proposals require a substantially smaller site and are appropriate within areas which will also benefit from high levels of footfall from office workers and local residents.
- 11.7 Should an appropriate site be identified either within or on the edge of the centre, it will be important to assess the potential implications of any development on the existing offer and operators of Whitehaven town centre to ensure that it would not be to detriment of the overarching vitality and viability, in accordance with the tests set out in both local and national policy. We note that the Council has identified a number of sites on the edge of Whitehaven town centre which could be suitable for a mix of commercial and residential uses, which will be considered further and brought forward as part of the new local plan.
- 11.8 In identifying suitable sites for new foodstore developments, discount foodstores in particular (and indeed, other foodstores of a similar scale) typically seek sites of 0.6ha or above to accommodate a standalone store, with adjacent parking and servicing. We note that the adopted Copeland Local Plan identifies a number of town centre development opportunity sites, ranging from 0.1ha to 1ha, located both to the north and south of the centre.
- 11.9 Having reviewed the sites which include areas around the Ginns, sites along Preston Street to the south and parcels of previously developed land to the north of the docks and adjacent to Tesco, there is the potential for the Council to provide for an allocation within the emerging local plan which is both realistic and sufficiently flexible to meet a wide range of potential uses within the town centre.

11.10 It is vital that in considering any potential development site, full consideration is given to the pedestrian and cycle linkages so as to encourage the maximum number of linked trips between the existing town centre and any new development. These 'linked-trips' will be key in ensuring additional floorspace does not harm the existing offer of the town centre and instead looks to 'join up' areas of the centre. Figure 11.1 below provides the general opportunity areas within Whitehaven town centre.

Figure 11.1: Whitehaven Opportunity Areas



11.11 Additional convenience goods floorspace is also likely to be delivered over the plan period in the form of small-scale convenience stores and petrol filling station kiosks which meet localised needs, and through the extension of existing stores. On this basis, we believe that, subject to the identification of appropriate sites and there being no unacceptable town centre impacts arising as a consequence of development, securing additional foodstore provision at Whitehaven should address identified quantitative capacity in the period to 2030 (i.e. the ten-year period identified as being of principal relevance for plan-making purposes by paragraph 85 of the NPPF).

- 11.12 In terms of comparison goods, we do not identify there to be any capacity for additional floorspace within either of the authority areas, particularly in light of the current commercial climate and inherent uncertainties which are unfolding. Indeed, we have been witnessing a period of transition in terms of the demand for retail floorspace within town centres and this has been exacerbated further through the COVID-19 pandemic. Instead, there is a need to repurpose retail stock and seek alternative uses for the floorspace which is no longer required within centres, recognising that the existing composition of units does not offer the space for bulky comparison goods.
- 11.13 Therefore, the headline finding from the comparison goods capacity assessment is that there is not a pressing requirement for 'additional' retail floorspace in the short to medium term. Instead, the current priority is to find new uses for some of the existing stock, bringing back some vacant floorspace into active uses through a mix of residential, leisure and community uses. However, should there be a future demand for additional modern-format floorspace to accommodate both independent and national multiple operators, such units may need to be provided on suitable edge of centre sites. Again, the Councils should apply sufficient flexibility in terms of permitted uses for any potential development sites on the edge of centres and that more flexibility is also applied to existing floorspace within the primary shopping areas (and town centres where primary shopping areas are not defined). Town centre living will not only assist in the repurposing of outdated retail stock but will also generate additional footfall throughout the day and evening. However, it is important that centres continue to provide that day-to-day retail, leisure and service offer needed by their local catchments and therefore retail and leisure will continue to play an important part in the future health of centres across West Cumbria.

Key Findings: Leisure

- 11.14 In terms of the leisure sector, we believe that the two authority areas are generally well provided for in respect of bingo halls, casino and ten pin bowling alleys (these being the commercial leisure uses that require a substantial site to accommodate them and therefore of particular interest in studies of this nature).
- 11.15 We have identified a potential to increase both the cinema and ten-pin bowling provision within Copeland in particular, but this is likely to be more in respect of 'boutique' style cinema or ten-pin bowling operators and early engagement with potential operators would be key at this stage. There

may be some opportunity of alternative commercial and leisure opportunities which could support coastal tourism as a result of the regions proximity to the Lake District National Park.

11.16 In terms of the food and drink sector, we believe that significant opportunity exists in respect of the food and drink sector in both Whitehaven and Workington and that any future development opportunities within or on the edge of the town centres should accommodate a range of units suitable to accommodate both national multiple and independent leisure operators.

11.17 Furthermore, we are of the view there is a real opportunity to encourage further community uses within the centres, and provide space for additional independent operators which may provide flexible space for local working, which is set to become the 'new norm' following the COVID pandemic. These types of spaces may provide more relaxed settings during the day, which can then be used to support the night-time economy in the evenings and provide space for informal cultural events.

Key Findings: Principal Centres

Workington Town Centre

11.18 Overall, we consider that the health of Workington town centre is mixed. There is a strong comparison offer, focused around Washington Square Shopping Centre. However, the centre's convenience offer is limited, due to the presence of larger competitors out of the centre, allowing for the growth of Workington as a comparison and service orientated centre. The vacancy rate is higher than the average and the number of vacancies has increased since the previous study.

11.19 The environmental quality of the centre is considered to be mixed, and there are areas in need of regeneration, alongside improvements required to the public realm. A town centre wide public realm strategy may be beneficial to tie together each element of the centre, creating a coherent vision and encouraging footfall throughout. The encouragement of footfall throughout the centre could also be achieved through the delivery of enhanced leisure, community and residential uses on key opportunity sites within the town. This would also enhance activity throughout both the day and evening which in turn would improve the feeling of safety.

11.20 In this regard, we note that the Allerdale Local Plan Part 2 identifies two sites within Workington town centre for additional commercial uses – Central Car Park (0.9ha) and the Royal British Legion (0.2ha). In this regard, we agree with the Council that sufficient flexibility should be applied in terms of the

types of uses permitted on the sites, and that particularly given the current commercial climate, a wider range of uses such as community uses and residential developments could also go some way to helping to secure the future vitality and viability of the town centre.

Whitehaven Town Centre

- 11.21 We have found that Whitehaven has a relatively good commercial offer and the vacancy rate, although is above the UK average in terms of the number of units, is below the average in terms of floorspace. However, the centre is lacking in terms of its overall offer of national multiples which is likely due to the approximate strong commercial destinations of Workington town centre and the out of centre retail parks, particularly within Allerdale's authority area.
- 11.22 Whitehaven's convenience offer is identified as overtrading, and the quantitative assessment has identified a capacity for additional floorspace across the plan period. Should any suitable sites come forward within the town centre, or closely linked to the town centre so as to benefit the wider offer for convenience goods development, then these should be explored to help redistribute the current overtrading within Whitehaven's stores. It is very important that any future scheme is not delivered to the detriment of existing operators within the town centre, and should be assessed carefully against the relevant policy tests. There may also be an opportunity to promote a high-end foodstore within the centre given the qualitative deficiency and the wider catchment for the centre which includes both tourists and the trainset workforce. However, this will be led by market demand and early engagement with commercial agents is advised.
- 11.23 Furthermore, it will be important to encourage the improvement of the shopfront facades along the pedestrianised street of King Street, given the central and important function this area has within Whitehaven. This may be encouraged through the delivery of office and residential space at first floor level and the comprehensive redesign of frontages. The adoption of a shop front strategy for Whitehaven to build upon the heritage aspects of the centre would also be beneficial.
- 11.24 Notwithstanding the varied vitality and viability of the town centre, it is evident that Whitehaven performs an important role in catering for the retail and service needs of Copeland Borough and to some extent the wider surrounding area, albeit on a relatively localised basis given the proximity of higher order centres such as Workington.

11.25 The Council has very recently submitted their bid for the Future High Streets Fund for Whitehaven. The vision proposes to develop a community digital hub at 6 Duke Street (the former Whittles building) and make the most of the C2C cycle route by creating a cycle hub at the former Barclays Bank site offering bike sales, bike hire, e-bikes, bike storage, repairs, a juice bar and guided tours. The proposal also aims to create residential opportunities with a focus on young professionals and post-graduate students along with public realm and street scene initiatives which will create a connection between King Street and the harbour at Strand Street comprising new arcades, a food court and artisan/small scale leisure spaces. Any future local plan allocations must take these wider aspirations into account, and in particular building on the public realm improvements to connect any future potential edge of centre allocations.

Key Findings Key Service Centres

11.26 The eight Key Service Centres (three in Copeland and five in Allerdale) typically serve a more localised role and provide catchments with their day-to-day retail and service needs.

11.27 However, the centres within West Cumbria range considerably in terms of size and offer and indeed, the overall health. Both authorities need to continue to protect the defined centres from competing development, and seek to encourage the diversity of uses and re-use of existing buildings in the centres through the relaxation of permitted development rights and inclusion of additional residential and where appropriate, leisure and community uses.

11.28 Throughout the current COVID pandemic the country has witnessed a change in habits and a desire to meet retail, leisure and additional service needs more locally. There is a drive to encourage more flexible spaces which can be used for both home-working purposes, for daytime and evening food and drink spaces and for spaces to be used for informal cultural events. Centres across the country are introducing 'community hubs' which provide space for pop-up operators to trial their business models and for informal areas within which people can meet and enjoy their surroundings. Alongside additional residential uses, these uses generate footfall and activity in centres, encouraging additional spending to help support high streets.

11.29 Whilst we would expect social distancing measures to reduce over time, hyperlocalism and homeworking are likely to continue to be a part of new landscape, with many, often office based workers in larger centres not wishing to return to the daily commute to the extent they did previously.

- 11.30 In the long-term we have already seen an increase in demand for flexible working arrangements and home working, with workers having experienced the various benefits of reducing 'lost' commuting time, more time spent at home with families, as well as the overall reduction in harmful emissions associated with long commutes (and the associated health and wellbeing benefits).
- 11.31 It is likely that a number of sectors will look to follow lead of tech companies that have already announced a move to home working, utilising offices as a central hub, necessary for face to face interactions and a consolidation of resources and facilities.

Recommendations: General Policy Approach

- 11.32 We note that both authority areas promote a 'town centre first' approach in their adopted and emerging plans, which we welcome. This is consistent with paragraph 85 of the NPPF (which indicates that planning policy should support the role of town centres at the heart of local communities), paragraphs 86 and 87 (which set out the sequential approach to development), and paragraph 89 (relating to the impact test).
- 11.33 The findings of this Study indicate a clear need to attract further investment, operators and activity to the principal centres in the two authority areas. The current vitality and viability of some of the centres is of significant concern and planning policy must be applied carefully in order to help return them to better health and deliver regeneration opportunities.
- 11.34 In this regard, we note that paragraph 017 of the Town Centres PPG indicates that proposals for edge and out of centre retail and leisure developments should be considered with reference to the health of centres that would be impacted upon. In this regard, paragraph 017 states that:

'A judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. For example, in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.'

- 11.35 In this case, the vacancy rates in the majority of the centres is above average and in some is considerably high. In addition, significant investment into the town centres in recent years has been generally limited, and there is a clear need to support the regeneration of opportunity sites in order to help the offer of centres to broaden and modernise. The work being undertaken through the Future High Street Fund initiative in Maryport and Whitehaven will substantially help.

- 11.36 We believe it to be clear from this Study that the growth in out of centre development across West Cumbria and beyond has had consequences for the health of the principal centres.
- 11.37 As a consequence, we believe that it is important for the forthcoming plan in Copeland and any future policy formulation in Allerdale to clearly identify that there is an issue with the current performance of principal centres and that it is necessary to bring about an improvement in these centres in order that they remain relevant and are able to appropriately serve residents' needs.
- 11.38 We recommend that the authority seeks to ensure that the forthcoming Plan in Copeland sets out town centre sequential and impact tests that can be applied in a robust manner to provide for future centres that are fit for purpose. Whilst non-retail uses will be an increasingly important component of the mix of land uses in principal centres moving forward, there is still a requirement to accommodate new retailers and additional retail floorspace within defined town centres wherever possible.
- 11.39 We believe that the future health of principal town centres will likely be undermined should:
- the vacancy rates in the worst performing principal centres not be the subject of a substantial improvement; and
 - the centres not attract future investment in order to accommodate modern operators and formats.
- 11.40 Any future planned investment which provides for the redevelopment of the sites identified in Whitehaven and Workington (and other town centre developments) should be safeguarded wherever possible. Within Whitehaven in particular, an opportunity to enhance the convenience offer on sites within or on the edge of the centre
- 11.41 In this regard, we note that paragraph 016 of the Town Centres PPG indicates that:
- 'Where wider town centre developments or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment. Key considerations will include:**
- **the policy status of the investment (i.e. whether it is outlined in the Development Plan)**
 - **the progress made towards securing the investment (for example if econtracts are established)**
 - **the extent to which an application is likely to undermine planned developments or investments based on the effects on current/forecast turnovers, operator demand and investor confidence.'**

11.42 Given the above, and as a consequence of how the NPPF impact test has been applied in practice²¹, we recommend that both Allerdale and Copeland continue to work to bring forward the respective sites and that each is able to demonstrate that progress continues to be made in a challenging market. Whilst the exact mix of uses to be brought forward at each of the sites has not yet been finalised, we recommend that the sites, their potential and the benefits of providing for their regeneration are identified in the emerging Plans as currently planned.

11.43 In respect of the sequential test, we recognise that paragraph 011 of the Town Centres Practice Guidance identifies that:

'Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification must be provided where this is the case, and land ownership does not provide such a justification.'

Recommendation: Principal Centres Boundaries - Copeland

11.44 Paragraph 85 of the revised NPPF requires local planning authorities to **'define the extent of town centres and primary shopping areas'**, with there now being no specific requirement to identify primary and secondary frontages. It is apparent from the Government's Response to the Draft Revised National Planning Policy Framework Consultation document (July 2018) that this change seeks to encourage a more positive and flexible approach to planning for the future of town centres.

11.45 Annex 2 of the revised NPPF indicates that a primary shopping area is the **'Defined area where retail development is concentrated.'**

11.46 Annex 2 also identifies that a town centre is the **'Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.'**

11.47 It is important to note that we have not provided recommendations in respect of the boundaries within Allerdale's centres given the relative recent adoption of Part 1 of the Local Plan and the

²¹ Including the Rushden Lakes Secretary of State 'call in' decision (PINS reference APP/G2815/V/12/2190175, which indicates that any planned investment needs to be beyond 'embryonic stage' and being actively progressed in order to be of material relevance to the NPPF impact test

significant progress made already with Part 2 of the Local Plan. Therefore, our commentary focusses purely on Copeland centres. Should further advice be required, we can provide this to the Council for the purposes of any future emerging policy.

- 11.48 In our experience, local planning authorities have typically favoured generous town centre boundaries in order that they incorporate the large majority of 'main town centre uses' in proximity to the core of their towns. However, such an approach can mean that additional town centre uses are not focused as tightly as possible around principal high streets, and that the sequential test is easier to pass as a consequence.
- 11.49 Accordingly, we believe that Copeland may benefit from giving further consideration to the purpose of town centre designations and the need to review their defined town centre boundaries in this context.
- 11.50 Where a town has areas within an existing centre boundary that are the subject of high vacancy rates and accommodate a declining number of main town centre uses, it may be appropriate to consolidate the town centre boundary in order that it is more focused and helps direct investment where it is most needed. It is important to note the NPPF's definition of the town centre, as provided at Annex 2. In this regard, the definition states that the town centre is the: 'area defined on the local authority's policies map, including the primary shopping area...'
- 11.51 The currently adopted town centre boundary for Whitehaven town centre includes the designated primary shopping frontages, along with the area along the frontage of the Harbour and a relatively large area to the south of the centre which includes the Morrisons foodstore and part of the Bridges Retail Park, Civic Hall, Library and the Council's former offices. However, there are areas of principally residential uses and other non-town centre uses which currently fall within the defined town centre boundary which we particularly consider do not fall within the remit of the town centre as defined by the NPPF.
- 11.52 In this regard, we have proposed some amendments to the currently adopted town centre boundary for Whitehaven town centre to remove these non-main town centre uses and to consolidate the boundary. It is important to note that this would not preclude future retail and/or leisure development within Whitehaven town centre but instead, will ensure that the Council has sufficient control over potential future competing developments which may have an adverse impact on the vitality and

viability of the defined centre. We have also amended the boundary to the south to include the entire Bridges Retail Park, given that we consider this to form an important part of the overall offer of the town centre.

- 11.53 Our recommended revisions to the town centre boundary for Whitehaven are provided on the plan at Appendix J.

Boundaries for Key Service Centres - Copeland

- 11.54 We believe that the offer in Copeland's smaller centres (Cleator Moor, Egremont and Millom) is generally varied and that the retail uses are not typically located in a manner which lends itself to the identification of a primary shopping area ('PSA'). As such we recommend that each of the three centres are defined by town centre boundaries only.

- 11.55 As is the case with Whitehaven, we have suggested some alterations to the defined town centre boundaries for the three centres of Cleator Moor, Egremont and Millom at Appendix 2.

- 11.56 The justification for the recommended amendments to the town centre boundaries is principally to remove the non-main town centre uses which fall within the current defined boundaries. Within each of the three centres these principally comprise residential uses. Further clarification on this will be provided at Draft Report Stage, particularly following discussions with the Council in respect of our suggested amendments.

Primary Shopping Areas - Copeland

- 11.57 The NPPF makes it clear at paragraph 85 that policies and strategies should specify the range of uses permitted in such locations as part of a positive strategy for the future of each centre. In doing so, it may be that some centres need to diversify to promote their long term vitality and viability and respond to changes in the market.

- 11.58 As such, we do not recommend that the Council imposes a threshold over the proportion of non-retail uses permitted within the primary shopping area to provide some flexibility, whilst ensuring that the primary shopping area continues to reflect the area which comprises predominantly retail uses.

- 11.59 In our experience, local planning authorities can be unaware of the difference in practice between primary shopping areas and town centres (in respect of the application of policy).

11.60 In this regard, NPPF Annex 2 (in defining what is meant by an 'edge of centre' location) identifies that:

'For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.'

11.61 This means that, for the purposes of retail development, only primary shopping area sites constitute 'in centre' development. As a consequence, when the local planning authority is required to consider the acceptability of impacts arising from out of centre retail development, it is the impact on the primary shopping area that is principally of consequence.

11.62 This was confirmed by the Secretary of State in determining a 'called in' planning application for a food superstore at Meols Cop Southport (PINS reference APP/M4320/V/15/3002637). Paragraph 318 of the associated Inspector's report states:

'...it is reasonable to surmise that the consideration of town centre vitality and viability in Paragraph 26 is referring to the PSA, which is the area where retail development is concentrated.'

11.63 This approach is validated by paragraph 13 of the Secretary of State's decision letter.

11.64 As stated above, we do not consider that the three centres of Cleator Moor, Egremont and Millom are of the scale or provide the appropriate offer to justify the designation of primary shopping areas. However, we do consider there to be a requirement to retain the primary shopping area within Whitehaven and we again provide our recommended approach on the plan at **Appendix M**. This accords within the NPPF definition to include the area within which retail principally dominates (and indeed, removing those areas which principally comprise leisure, office and other uses). In this regard, where a centre does not include a defined primary shopping area, reference to the town centre for the retail sequential and impact tests is taken to mean the town centre boundary.

Recommendation: Local Impact Thresholds

11.65 Paragraph 89 of the NPPF states that it is appropriate to identify thresholds for the scale of edge of centre and out of centre retail and leisure development that should be the subject of an impact

assessment. Any such threshold policy applies only to the impact test (all planning applications for main town centre uses that are not in an existing centre and not in accordance with an up-to-date development plan will generally be the subject of the sequential test²²).

11.66 The purpose of applying an impact threshold within the development plan which deviates from the national threshold of 2,500 sq.m, is to allow the Council to retain appropriate control in respect of the potential for development to impact on the future health of defined centres within the Borough. By applying a lower threshold, applications for developments which could potentially have a harmful effect on the overall vitality and viability of a defined centre, will need to be supported by a proportionate impact assessment which sets out the potential trade diversion impact assumptions.

11.67 Paragraph 16 of the Town Centres PPG provides specific guidance in relation to floorspace thresholds and states:

‘The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace unless a different locally appropriate threshold is set by the local planning authority. In setting a locally appropriate threshold it will be important to consider the:

- **scale of proposals relative to town centres**
- **the existing viability and vitality of town centres**
- **cumulative effects of recent developments**
- **whether local town centres are vulnerable**
- **likely effects of development on any town centre strategy**
- **impact on any other planned investment.’**

11.68 Using the above guidance, we set out the justification to support our view that a lower threshold should be applied across the hierarchy of centres within the two authority areas. With this in mind, we have also revisited the two authorities current local impact thresholds.

11.69 It is our view that applying a single threshold that applies to all types of centre in Allerdale and Copeland is not generally appropriate, given the different scale and nature of each of the centres. Instead, we recommend a tiered approach whereby the threshold applied to planning applications at

²² With the exception (in accordance with paragraph 88 of the NPPF) of small scale rural office proposals and other small scale rural development.

- edge-of-centre and out-of-centre locations varies in relation to the role and function of a particular centre.
- 11.70 In considering the setting of a local impact threshold, it is important to give consideration to the type of development (relating to convenience and comparison goods retail uses, and leisure uses) which would, in practice, provide space for key operators who could act to 'anchor' a centre. Should one of these anchor units or operators leave a centre, there will likely be the potential for a significant adverse impact to arise.
- 11.71 As such, where there is genuine potential for an application proposal to divert a material level of expenditure away from a defined centre, or potentially remove a key tenant from that centre, there will likely be a requirement to consider the impacts arising from the proposal in detail.
- 11.72 In respect of lower order centres, the introduction of even a small convenience store nearby (of the type operated by Sainsbury's Local or Tesco Express) may have the potential to impact on the ongoing viability of key operators. Small convenience stores operated by national multiple grocers can generate a relatively substantial turnover. If this is diverted from existing retailers in defined centres, the impact on the overall vitality and viability through the loss of spend and footfall, could be of a significant adverse magnitude.
- 11.73 Therefore, in implementing a local threshold policy, it is considered more appropriate to apply a range of thresholds in accordance with the type of centre the proposed development is proximate to. The thresholds should not only apply to new floorspace, but also to changes of use and variations of condition to remove or amend restrictions on how units operate or trade in practice. We provide our analysis below in respect of the town and key service centres.

Town Centre Thresholds - Allerdale

- 11.74 We note that it is not the purpose of this Study to provide direct policy guidance in respect of emerging policy for Allerdale authority area. However, for completeness, we have reviewed the Council's current policy and provide our brief considerations of the appropriateness of the existing thresholds below.
- 11.75 Policy DM8 of the Local Plan Part 1 provides a series of thresholds for the centres within Allerdale, ranging from 100 sq.m for Silloth to 500 sq.m for Workington. As we discuss in more detail below,

we have also recommended that a threshold of 500 sq.m also applied to Whitehaven town centre, given its current offer, proportion of vacant units and nature of anchor units. However, for the smaller key service centres, we recommend a threshold of 300 sq.m across the board, which is consistent with Allerdale's adopted threshold for the larger centres within the authority area of Maryport, Cockermouth and Wigton. We therefore consider our recommendations as set out below for Copeland's centres to be consistent with Allerdale's approach.

- 11.76 We also recognise the need to provide an added hierarchy within the impact thresholds for Aspatria and Silloth given the smaller sizes of the centres and the potential threat to both centres even from a relatively small competing development. In this regard, we do not have any additional recommendations to make in respect of impact thresholds in Allerdale.

Town Centre Thresholds - Copeland

- 11.77 We believe that town centre anchor units will typically provide at least 500 sq.m of gross floorspace. Such a unit could potentially accommodate an operator of importance, which is capable of attracting shoppers to a centre, thus increasing the potential for linked trips.
- 11.78 We note that there are a relatively limited number of units greater than 500 sq.m in the four town centres of Copeland and that the vacancy rates vary throughout the defined centres. In summary, in terms of Copeland centres:
- In **Whitehaven town centre**, less than 5% of the total stock of commercial units in the town centre have a greater floorspace than 500 sq.m, which includes the large format leisure units which accommodate the Rackshack Snooker Club and four pubs, as well as retail units which accommodate national retailers such as Wilko, Argos Dixons, Morrisons and a Tesco Superstore. The vacancy rate equates to 9.4% of total commercial floorspace and 12.9% of all units.
 - In **Egremont town centre** approximately 5% of all units have a greater floorspace than 500 sq.m, which includes the original Factory Store, the Market, the Lounge Bar and the Co-operative food store. The vacancy rate equates to 19% of total commercial floorspace and 25% of all units.

- In **Cleator Moor town centre** there are no units with a greater floorspace than 500 sq.m, excluding the Cleator Moor Civic Centre. The vacancy rate equates to 31% of total commercial floorspace and 30% of all units.
- In **Millom town centre** less than 5% of the total stock measures 500 sq.m or more, which includes the Tesco Supermarket, The Clock Tower Restaurant, the Conservative Social Club and Travis Perkins. The vacancy rate equates to 19% of total commercial floorspace and 24% of all units.

11.79 In this context, we recommend that the impact threshold of relevance to Whitehaven town centre is set at 500 sq.m for both retail and leisure proposals. This threshold would effectively be the default to be applied authority-wide, should a proposal not fall within the criteria set out below which we recommend is applied to development in proximity to the Key Service Centres.

11.80 The above recommendation is also reflective of the town centre vacancy rates and the potential for out of centre retail developments to become even stronger in the future at the expense of centres' vitality and viability. The existing out of centre commercial destinations all offer a range of comparison goods, which traditionally would have been sold from town centres. As such, the recommendation is reflective of the need to safeguard against the out of centre retail destinations becoming even stronger at the expense of the health of defined centres.

11.81 The key service centres are generally anchored by a national multiple convenience store (typically operated by Co-op). These operators underpin the function of these centres, drawing in custom and encouraging linked trips to the other parts of the centre. Should the viability of such stores be impacted, there is a real risk of the role of the wider centre being undermined. There are relatively few units substantially larger than 300 sq.m in any of the key service centres; as such, to lose an occupier of this magnitude could have a significant adverse impact on the centre as a whole. Accordingly, in the local context, 300 sq.m constitutes a significant unit for key service centres.

11.82 For the purpose of drafting future planning policy, it is important to qualify the area to which each local impact threshold will apply. We recommend that the threshold of relevance to the key service centres (i.e. 300 sq.m) would be applicable within 800 metres of the boundary of the relevant centre. The distance of 800 metres is broadly commensurate with the potential walk-in catchments of smaller centres and is identified by Guidelines for Providing for Journeys on Foot (The Institution

of Highways & Transportation, 2000) as being the 'preferred maximum' acceptable walking distance to a centre. We consider it to be appropriate for the higher threshold of 500 sq.m to apply authority-wide (i.e. beyond 800 metres of these centres), due to the lesser likelihood of significant adverse impacts arising from retail and leisure development.

Recommended Policy Approach

11.83 Based on the above, we are of the view that an impact assessment will be necessary to accompany proposals for retail and leisure uses (including those relating to mezzanine floorspace and the variation of restrictive conditions) which are not located within a defined centre where:

- the proposal provides a gross floorspace in excess of 500 sq.m gross; or
- the proposal is located within 800 metres of the key service centres and is in excess of 300 sq.m gross.

11.84 In our experience, it will only generally be development of a scale greater than these thresholds which could lead to a 'significant adverse' impact, which could merit the refusal of an application for town centre uses in accordance with the provisions of paragraph 90 of the NPPF. The setting of a 'tiered' threshold is consistently accepted by Inspector's at Local Plan Examination and, in our view, acts to appropriately ensure that only those proposals which could genuinely result in an unacceptable impact are the subject of an impact assessment.

11.85 It is important to emphasise that, whilst the locally set threshold would require the submission of an impact assessment for all edge-of-centre and out-of-centre developments exceeding the thresholds, national guidance states that the impact test should be undertaken in a proportionate and locally appropriate way, commensurate to the scale of development proposed. The level of detail would typically be agreed with planning officers during the pre-application process in order to avoid overly onerous requirements that may otherwise restrict and delay development opportunities from coming forward.

Monitoring recommendations

11.86 This study provides the Council with its floorspace needs requirements to 2035. To establish whether the requirements for new floorspace (by type) are being met and more generally to monitor the performance, the Council should monitor:

- planning permissions for retail floorspace - by type, amount (sqm gross and net), location and retailer;
- completions of retail floorspace - by type, amount, location and retailer;
- mix of uses, including vacancies; and
- health checks of designated centres. This is particularly important given the current commercial and economic situation.

11.87 The monitoring recommended above is relatively straightforward and should be conducted on a rolling basis for the first two items and annually or every two years for the latter two items.

11.88 The recommendations set out in this report may need to be adjusted, in the future, due to changing market conditions, demographic changes and the impact of developments elsewhere. They may also need to be adjusted if standard assumptions, in particular those relating to expenditure growth and e-tailing, change. The role of monitoring is crucial in highlighting changes in the assumptions that underpin this study and we recommend regular monitoring to the Council.

Appendix A: Trends Review

Appendix B: Planning Policy Summary

Appendix C: Changes to Permitted Development Rights and Use Classes Order

Appendix D: In Street Survey Questionnaire and Results

Appendix E: Example Questionnaire from the Business Survey

Appendix F: Scanned Copies of Stakeholder Feedback Maps and Example Questionnaires

Appendix G: Allerdale Centre Healthchecks including Diversity of Use Plans

Appendix H: Copeland Centre Healthchecks including Diversity of use Plans

Appendix I: Quantitative Tables

Appendix J: Recommended Town Centre Boundaries

Appendix K: Study Area Plan

Appendix L: Full Household Survey Results

Appendix M: Copeland Policy Recommendations

Appendix N: Survey Findings

Appendix O: Stakeholder Workshop Summary

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