

West Cumbria Retail, Town Centres and Leisure Study

Executive Summary

on behalf of Copeland and Allerdale Councils

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Executive Summary

Instruction and Scope

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. The focus of the Study is to establish the current position in respect of the need for additional retail and leisure facilities in Allerdale and Copeland Boroughs, and consider the vitality and viability of the principal centres in the Study Area¹.
2. 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. This study provides an update to the West Cumbria Retail Study produced in 2009 and the 2012 Addendum. It will also assist Copeland 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.
3. To inform the findings of the Study, Nexus partnered with specialist consultancy NEMS Market Research Ltd in order to obtain empirical evidence through completion of a household telephone survey of 1,000 respondents and in-street surveys in the two principal town centres in West Cumbria, Whitehaven and Workington. 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.
4. 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,

¹ These being Workington, Aspatria, Cockermouth, Maryport, Silloth and Wigton in Allerdale and Whitehaven, Cleator Moor, Egremont and Millom in Copeland.

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.

Planning Policy Context: National Planning Policy Framework

5. The most recent iteration of the National Planning Policy Framework ('NPPF') was published in February 2019. It recognises that a flexible approach will be necessary to provide for the future vitality and viability of town centres, and incorporates a number of policies that impact on the findings of studies of this nature. 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. In respect of plan-making and the associated planning evidence base, the following policies are of greatest relevance.
6. Paragraph 20 of the NPPF indicates that development plans should set out an overall strategy for the pattern, scale and quality of development, including policies to deliver retail, leisure and other commercial development. Paragraph 31 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be proportionate and take into account relevant market signals.
7. Paragraph 85 specifically relates to planning for town centres. It indicates that planning policies should:
 - define a network and hierarchy of town centres and promote their long-term vitality and viability;
 - define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations;
 - retain and enhance existing markets;
 - allocate a range of suitable sites in town centre to meet the scale and type of development likely to be needed, looking at least ten years ahead;
 - where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre; and

- recognise that residential uses can play a role in underpinning the vitality of centres.

Market Research

Household Surveys

8. 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 the main 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 to establish the level of 'inflow' from surrounding residents into West Cumbria's centres.
9. The defined Study Area has been broken down into eight separate zones 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 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 the report. The survey results also underpin the quantitative retail capacity assessment provided at Section 8. The Allerdale authority area broadly comprises Study Area Zones 1 to 5, and the Copeland authority area comprises Study Area Zones 6 to 8.
10. The household survey results are provided in full at Appendix K of the Study. In respect of convenience goods, the findings that are of greatest relevance to the future retail and centres strategy in the Study Area are as follows:
 - the destinations in West Cumbria (Allerdale and Copeland) claims 89.3% of main food shopping expenditure and 91.6% of top up food shopping expenditure;
 - convenience goods operators in Allerdale and Copeland benefit from relatively little expenditure from outside the authority area, which is not unexpected given the localised nature of convenience goods shopping; and
 - the discount foodstore sector is performing extremely well, with Aldi/Lidl stores identified within the top three performing foodstores in Zones 1, 2, 3, 4 and 6.

11. In terms of comparison goods, our assessment has identified that:

- The vast majority of residents within Zones 1 to 7 are able to meet their comparison goods shopping needs within the Study Area, principally at Whitehaven and Workington Town Centres and Derwent Retail Park in Workington; and
- The overall Study Area market share of comparison goods expenditure is 72.2% at 2020.

In-Street Surveys

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

- 75.0% of respondents visit Workington at least once a week whilst 79.0% of all respondents visit Whitehaven at least once a week;
- The principal reason cited by respondents for visiting both Workington and Whitehaven town centres is to go shopping followed by work;
- In Workington, the most popular shop to undertake grocery shopping was cited by respondents as Iceland on Pow Street, whereas in Whitehaven, the most popular shop to undertake grocery shopping was cited by respondents is Morrisons, Flatt Walks, located outside of the town centre boundary;
- When asked what they liked about Workington, more than a third of respondents cited that the range of shops and markets was the aspect of Workington town centre that they liked most. Notably, none of the respondents stated that the reason why they liked Workington was because it is convenient to their place of work;
- When asked what they liked about Whitehaven, 15.0% cited the range of shops as the main thing they like about the centre and 13.0% of respondents stated that they liked the harbour;

- In Workington, the most popular suggestion for improvements to the centre was the provision of different or better shops or markets;
- In Whitehaven, more than half of respondents (51.0%) stated that they would like different or better shops or markets, whilst the majority of the remaining respondents stated that improved quality or cleanliness of public space would be their favoured improvement measure; and
- 38.0% of respondents considered that Workington's shopping offer is better than other towns.

Business Surveys

13. 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. 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; and
- In Whitehaven, 63.64% of respondents consider there to be too many non-retail uses, citing too many empty premises and take-away services.

Stakeholder Workshops

14. 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.
15. The stakeholder workshop comprised 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.

Key Findings

- **Workington:** 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 is considered a key weakness to the west of the town also due to a lack of signage from the train station. However, the workshop established a number of opportunities including potential for pedestrianisation of the primary shopping areas, creation of activities for young people and support skills, creation of linkages, redevelopment, improvements to wayfinding and signage, and centralised public realm.
- **Whitehaven:** The Stakeholders considered that empty shops, car parking, vehicle dominated areas, the quality of retail offer and lack of leisure activities to be the principal weaknesses of Whitehaven. The principal strengths in Whitehaven were considered by the Stakeholders to be the harbour, the pedestrianised zone of King Street, the walking proximity to amenities, small local shops, the Georgian architecture, and the market place which is considered to provide a focal point for markets. As such, the Stakeholders consider the key opportunities for Whitehaven to be an increase of town centre dwellings, encouragement of activity throughout the evening, improvements to the linkages between the harbour and main shopping area, improved signage and a focus upon tourism.

Population and Expenditure

16. 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.

17. Table 1 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 1: 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

18. 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, however new Local Plans for Copeland and Allerdale Councils provide an opportunity to reverse the trend of population loss through planning for growth.

Convenience Goods Expenditure

19. Taking into account the Study Area resident population and the available per capita convenience goods expenditure, we estimate that £369.6m² of convenience goods expenditure originates within the Study Area at 2020. The below Table 2 indicates that available Study Area convenience goods expenditure is forecast to decrease to £355.4m at 2035.

Table 2: 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

² In 2018 prices, as is every subsequent monetary reference

20. Table 3 indicates that this represents a decrease of £14.2m (or 4.0%) across the Study Area between 2020 and 2035. Given the slight fall in per capita convenience goods expenditure identified above, this decrease can largely be attributed to the forecast decrease in the Study Area's population.

Table 3: 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

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)³. 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

22. For comparison goods, Table 4 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.

Table 4: 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

23. As identified at Table 5, 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 5: 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

³ This is a fairly standard split applied in undertaking this exercise

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

Analysis of Out of Centre Provision

25. 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 the West Cumbrian town centres due to their specific business model requirements. There are four principal out of centre retail destinations in West Cumbria; Dunmail Retail Park, Derwent Drive Retail Park within the vicinity of Workington, and Whitehaven Bridges Retail Park and Preston Street Retail Park within Whitehaven.
26. 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, in Workington, attracts the highest proportion of comparison shopping trips from West Cumbrian residents.
27. 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. In this regard, 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 (1.6% compared to 11.0%).
28. In contrast to Workington's retail parks, Preston Street Retail Park in Whitehaven has attracted a number of large retail units despite not being a purpose built retail park, and exhibits the third greatest turnover of the four retail parks assessed. Whilst Bridges Retail Park in Whitehaven exhibits the lowest turnover, it benefits from an accessible edge-of-centre location, adjacent to Whitehaven's Leisure Centre and most popular supermarket for grocery shopping.
29. 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

typically occupy floorspace within the town centres. 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.

Assessment of Retail Needs

30. The floorspace requirements identified in this Study are of some relevance to the determination of future planning applications, as they reflect the additional floorspace that could likely be accommodated in West Cumbria whilst allowing existing floorspace to benefit from turnover growth, such that the existing provision continues to trade in a viable manner. However, this is dependent on additional retail growth being brought forward in appropriate locations and the identification of an expenditure surplus does not necessarily mean that new floorspace can be accommodated without unacceptable adverse impacts arising within defined centres.
31. In this regard, it is relevant to note that both Allerdale and Copeland centres have a significant number of vacant commercial properties and it will be important to try to bring about the reuse and reoccupation of such floorspace. However, there are some outdated buildings particularly within Whitehaven town centre which are no longer 'fit for purpose' for retail use and as such, the re-use of existing stock for alternative non-retail uses may also be appropriate, particularly to ensure that unsuitable floorspace does not remain vacant for prolonged periods of time. This may in turn result in the need to provide modern format units on edge of centre sites to ensure that key operators can still be accommodated within or on the edge of centres dependent on the commercial demand.
32. Conversely, it is important that the below figures are not interpreted as a strict 'cap' on development as there is no test of 'need' set out in the NPPF. Instead, future proposals for additional retail floorspace should be assessed to determine their compliance with the relevant policies of the NPPF and the development plan.

Convenience Goods

33. Across West Cumbria and once commitments are taken account of, we have identified between 1,300 and 2,200 sq.m of convenience goods capacity at 2020, which reduces to between 0 and 100 sq.m at 2035. The capacity identified is due to the fact that when considered together and taking account of

inflow from tourism spending, the convenience stores within West Cumbria are over trading by approximately £34.6m at 2020.

34. When looking at each individual authority area, our findings indicate that there is no capacity for additional convenience goods floorspace in Allerdale once commitments have been taken into account.
35. However, within Copeland we do identify a need of between 1,000 and 1,700 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.

Table 6: Potential Requirement for Convenience Goods Floorspace

	2020 (sq.m)	2025 (sq.m)	2030 (sq.m)	2035 (sq.m)
Allerdale				
Minimum Convenience Goods Floorspace	-100	-500	-700	-900
Maximum Convenience Goods Floorspace	-200	-800	-1,200	-1,500
Copeland				
Minimum Convenience Goods Floorspace	1,400	1,200	1,000	900
Maximum Convenience Goods Floorspace	2,400	2,000	1,700	1,500

Source: Table 6d of Appendix 6 of main report

36. 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).
37. It will be important that any new foodstore is brought forward in support of, and 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.

38. Should an appropriate site be identified, 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. Discussions with key commercial agents would be useful to establish the appetite from a range of convenience operators in expanding their offer within Whitehaven. Given the overtrading of the Aldi and the lack of any competing discount foodstores within the town, this may indicate a qualitative demand to increase the provision of discount convenience floorspace. However, there may also be demand from the higher-end of the sector and that all avenues should be explored to best meet the town's and the population's needs.
39. 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.

Comparison Goods

40. 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 in light of both the COVID pandemic and Brexit.

Table 7: Potential Requirement for Comparison Goods Floorspace

	2020 (sq.m)	2025 (sq.m)	2030 (sq.m)	2035 (sq.m)
<i>Allerdale</i>				
Minimum Convenience Goods Floorspace	-2,700	-5,800	-6,300	-7,300
Maximum Convenience Goods Floorspace	-4,700	-9,900	-10,700	-12,400
<i>Copeland</i>				
Minimum Convenience Goods Floorspace	0	-1,000	-1,000	-1,300
Maximum Convenience Goods Floorspace	0	-1,600	-1,800	-2,200

Source: Table 6d of Appendix 6 of main report

41. Therefore, the headline finding from the comparison goods capacity assessment is not that there is a pressing requirement for ‘additional’ retail floorspace in the short to medium term. However, given that the high streets have been impacted by a wide range of wider external commercial market factors including the COVID pandemic, it has become apparent that units and floorspace which are no longer ‘fit for purpose’ may need repurposing for non-retail uses (residential, leisure, community and so on).
42. As such and in order to ensure that sufficient space is available for modern format retailers, there may be a requirement to provide suitable replacement floorspace on edge of centre sites should the demand arise. Adopting a flexible approach to such allocations will be important to ensure that if the market does not identify the demand for additional retail and/or leisure floorspace, that a wider range of uses such as residential and tourism development are also allowed.

Assessment of Leisure Needs

43. 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 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).
44. 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.
45. 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. 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.
46. 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 in the case of Whitehaven, tourist destinations, 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, and maximise the benefits of being located on the Lake District Coast, thereby encouraging a greater number of multi-purpose visits and increasing the amount of spend.
47. 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.

Health of Defined Centres and Future Strategy

48. Comprehensive healthcheck assessments have been undertaken for the ten centres which assess the indicators set out at Paragraph 006 of the Town Centres PPG. We provide a summary below of the assessments for the two main town centres (Whitehaven and Workington), with full details in respect of all centres assessed provided in the Study.

Workington Town Centre

49. 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.

50. 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.
51. 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). These allocations will provide more flexibility in terms of the types of uses permitted on the sites which, particularly given the current commercial climate, will go some way to help secure the future vitality and viability of the town centre by permitting a wider range of uses such as community uses and residential developments.

Whitehaven Town Centre

52. 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 and the out of centre retail parks, particularly within Allerdale's authority area.
53. Whitehaven's convenience offer is identified as overtrading, and the quantitative assessment has identified a capacity for additional floorspace across the plan period. The current offer is considered to be relatively 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. 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.

54. 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 retail units to allow accessibility through to Strand Street. The adoption of a shop front strategy for Whitehaven to build upon the heritage aspects of the centre would also be beneficial.
55. 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.
56. 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. There may be opportunities to enhance the convenience offer in Whitehaven town centre, alongside additional leisure uses to better meet both the resident catchment's needs but also the needs of the transient workforce and tourists. 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.
57. The Council has very recently submitted their bid for the Future High Streets Fund for Whitehaven. 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.

58. 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.

Key Findings Key Service Centres

59. 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.
60. 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.
61. 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.

Recommendations and Interventions

Recommendations: General Policy Approach

62. 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.

63. 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.’

64. 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 should help.
65. As a consequence of the growth in out of centre development across West Cumbria and the consequential impacts on the health of the principal centres, 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.
66. 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.
67. 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. Given this, and as a consequence of how the NPPF impact test

has been applied in practice⁴, 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.

Recommendations: Principal Centres Boundaries - Copeland

68. 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.
69. Annex 2 of the revised NPPF indicates that a primary shopping area is the **'Defined area where retail development is concentrated.'** 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.'**
70. It is important to note that we have not provided recommendations in respect of the boundaries within Allerdale centres given the relative recent adoption of Part 1 of the Local Plan and the 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.
71. 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.
72. 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.

⁴ 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 of material relevance to the NPPF impact test

73. 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.
74. Our recommended revisions to the town centre boundary for Whitehaven are provided on the plan at Appendix I.

Boundaries for Key Service Centres – Copeland

75. 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.
76. 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.

Primary Shopping Areas - Copeland

77. 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.
78. 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. 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 frontage within Whitehaven and we again provide our recommended approach on the plan at Appendix L.

Recommendation: Local Impact Thresholds

79. In accordance with the requirements of paragraph 89 of the NPPF, 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).
80. 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 edge-of-centre and out-of-centre locations varies in relation to the role and function of a particular centre.
81. 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.
82. 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.
83. 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

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

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

84. We 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

85. 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. 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.
86. 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.
87. 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.
88. 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

89. 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.
90. 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.
91. 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.

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