

Newcastle-under-Lyme Retail and Leisure Study Update

Final Report

ON BEHALF OF NEWCASTLE-UNDER-LYME BOROUGH COUNCIL

June 2024

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1. Introduction

Instruction and Purpose

- 1.1 Nexus Planning has been instructed by Newcastle-under-Lyme Borough Council (hereafter referred to as 'the Council') to undertake an update to the Retail and Leisure Study produced in 2019. The primary focus of the Study is to establish the current position in respect of the need for additional retail and leisure facilities in the Newcastle-under-Lyme authority area, and to consider the vitality and viability of the principal centres.
- 1.2 The principal elements of the commission were agreed with local authority at the inception stage of the process. These were:
1. Review of current Retail and Leisure Study and relevant documents, and familiarisation with the Council's emerging plan and future growth strategy.
 2. Update of the quantitative retail model to reflect:
 - a. the latest Experian population and expenditure data (February 2024);
 - b. current forecasts in respect of expenditure growth and special forms of trading; and
 - c. the population growth being planned for by the Council (in respect of both the amount and distribution of growth).
 3. Consideration of leisure needs with reference to the current national average benchmarks in respect of the number of persons required to support additional cinema screens, bowling alleys and so on.
 4. Detailed healthcheck assessments which consider the current role, function and performance of the key centres of Newcastle-under-Lyme and Kidsgrove.
 5. Concise updated reviews of the role, function, composition and offer of all lower-order centres.
 6. Drafting of Update report, setting out the current market context and an updated position in terms of retail and leisure capacity findings and overarching recommendations.
 7. Drafting of updated policy recommendations and conclusions to take account of the current performance of the centres, key centre boundaries, the new Use Class E, permitted development rights, and the revised capacity findings.
- 1.3 This Study seeks to provide an update to the Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Retail and Leisure Study in July 2019, focusing on the Newcastle-under-Lyme authority area only. As such, this Update utilises the findings from the household survey undertaken to support the 2019 Study, which surveyed 1,500 households covering a 13 zone Study Area. Of the 13 zones adopted, the Newcastle-under-Lyme authority area is principally comprised of parts of Zones 2, 7, 12 and 13 (and small parts of Zones 5, 8, 10 and 11).
- 1.4 A plan of the Study Area is provided at Appendix 1, and the tabulated household survey results are provided at Appendix 2.

Structure of Report

- 1.5 Our report firstly provides an overview of prevailing retail and leisure trends, before then going on to consider the planning policy context for the Updated Study. We then considering the vitality and viability of the defined centres within the borough.

1.6 The remainder of the report identifies retail and leisure needs arising within the Borough to 2040. To undertake this assessment, we identify population and expenditure growth across the Study Area. The final sections of the report provide our conclusions in respect of retail and leisure needs, and provide our planning policy recommendations.

1.7 Accordingly, this report is structured as follows:

- Section 2 sets out key retail and leisure trends of relevance to the commission;
- Section 3 provides an overview of the planning policy context;
- Section 4 summarises our assessment of the vitality and viability of the defined centres;
- Section 5 provides an overview of forecast changes in Study Area population and expenditure;
- Section 6 provides an assessment of retail needs;
- Section 7 provides an assessment of leisure needs; and
- Section 8 summarises our key findings and sets out our conclusions and policy recommendations.

2. Current and Emerging Retail and Leisure Trends

- 2.1 In order to provide a context for this Study and to help identify the sectors that are more likely to be the subject of additional development proposals, we set out a summary of current retail and leisure trends below. In reading the summary, it should be noted that the retail and leisure sectors are dynamic and, whilst online shopping and economic conditions have impacted on the high street, new retailers and formats continue to evolve to meet shoppers' needs.
- 2.2 The below commentary should therefore be taken as a 'snapshot' in respect of current market conditions; it will be necessary to judge future development proposals for main town centre uses with reference to the prevailing circumstances at the time of a proposal's determination. Whilst the impact of Covid-19 on the retail and leisure sectors has lessened in 2022 and 2023, the trading outlook remains challenging due to inflationary pressures and significant increases in the cost of living. We reflect further on the current economic outlook below.

Economic Conditions

- 2.3 The UK economy was impacted significantly by the Covid-19 pandemic in 2020 and 2021, and by restrictions on movement and behaviour which sought to mitigate its impact. This uncertain background caused retail and leisure expenditure (and business investment) to decline. Household spending fell by over 20% quarter-on-quarter in the second quarter of 2020 following the imposition of national lockdown measures. This is the largest quarterly contraction on record. Retail sales volumes also suffered double-digit falls in April 2020 as all but essential stores closed during the height of the lockdown.
- 2.4 However, following the gradual reopening of businesses over the summer of 2020, the economy returned to growth, with this gathering momentum as a greater number of sectors reopened, including hospitality and leisure services. A resurgence in the number of cases of Covid-19 then resulted in the Government reinstating a nationwide lockdown in early 2021. The general economic outlook in 2022 and 2023 has continued to be of concern given very significant increases in the rate of inflation and the general cost of living.
- 2.5 In February 2024, Experian published its Retail Planner Briefing Note 21 ('ERPBN21'), which identifies anticipated future growth in the retail and leisure sectors and considers likely changes in bricks and mortar retail floorspace and online sales.
- 2.6 ERPBN21 anticipates that retail spending has been squeezed in 2022 and 2023 as a consequence of inflationary pressure and increases in the cost of living. Page 5 of ERPBN21 provides the following summary of the economic outlook:
- 'Looking ahead, spending growth over the course of 2024 remains affected by the lingering effects of the cost-of-living crisis, as though inflation is slowing towards target, high interest rates continue to constrain household budgets, particularly those with mortgage debt. A high tax burden is also acting as a dampener on discretionary income. Rising real pay growth and continued strength in the labour market should still allow for a less negative year than 2023.'**
- 2.7 It is clear that the Covid-19 pandemic has accelerated the shift to online retailing with a consequent reduction in bricks and mortar retail floorspace. As a consequence, the proportion of expenditure committed via special forms of trading (i.e. internet and mail order sales) has increased.
- 2.8 More generally, as a result of relatively modest growth forecasts and the shift to online retailing, Experian forecasts that there will be a reduction in the stock of retail floorspace over the next few years.

- 2.9 In terms of inflation, Office for National Statistics data¹ indicates that the rate of inflation (as measured by the consumer price index) increased from 0.8% at April 2020 to 1.5% at April 2021, before then increasing significantly to 9.0% at April 2022. The rate of inflation appears to have peaked at 11.1% in October 2022 and has reduced significantly to 6.7% at August 2023. Retail has been an industry under significant stress, as many retailers find themselves squeezed between rising costs and the increasing volume of sales over the internet. Such difficulties have, of course, been exacerbated by the Covid-19 pandemic and the cost of living crisis associated with rising energy prices and inflation.
- 2.10 There will still be the need and demand for physical stores, despite the increase in shopping online. This is particularly the case for convenience goods sales given that online shopping orders are typically picked from the shelves of physical stores. In respect of comparison goods, there is a need for the offer to become more 'experiential' to encourage shoppers onto the high street, and to ensure that shopping is viewed as a pleasurable pastime. The shopping experience needs to evolve and diversify both to attract footfall and convert increased activity into sales. Independents clearly have an important role to play in adding interest and in providing differentiation between shopping venues.
- 2.11 In considering the current strength of the retail and leisure sectors, it is important to recognise that different types of retailer have been the subject of different fortunes.
- 2.12 Non-essential retailers have been impacted by enforced 'lockdown' closures in 2020 and 2021. However, dispensing chemists traded more strongly from March 2020, and their sales continued to be above pre-pandemic levels into 2022 and early 2023. Foodstores also generally traded consistently above their pre-pandemic levels. This was initially due to a degree of stockpiling of grocery goods, but some ongoing boost in sales was evident due to the ongoing prevalence of working from home. Furniture and homeware retailers also generally benefitted from people spending more time in their homes and wanting to improve their own environment. However, in light of increasing inflation and changes to working patterns throughout 2022, it is understood that there has now been a shift away from this pattern.²

Available Expenditure and the Impact of the Internet

- 2.13 Experian expenditure data and growth forecasts confirm that the pandemic has resulted in turbulent short term changes in per capita convenience and comparison goods expenditure. In this regard, ERPBN21 identifies that per capita convenience goods expenditure decreased by 5.8% in 2022 with a further reduction of 3.0% in 2023. This follows a previous reduction of 1.7% in 2021. Before this, in 2020, per capita convenience goods expenditure increased by 8.6%. The strong level of growth at 2020 is largely attributable to consumers spending more on such goods as a result of lockdown measures. Limited annual per capita expenditure growth (relative to that which has been achieved historically) is anticipated to return across the medium to long term.
- 2.14 As the below Table 2.1 shows, the position in respect of annual per capita comparison goods expenditure has been changeable in the past few years. Whilst annual per capita comparison goods growth of 8.1% was recorded in 2021, this followed a reduction of 7.9% in 2020. Forecast per capita comparison goods expenditure increases over the medium and longer term are positive but still below the level apparent at the turn of the millennium.

¹ ONS 'Consumer price inflation tables' dataset, July 2023.

² Article headlined 'Retail sales in Great Britain rise despite cost of living crisis', The Guardian, 19 August 2022.

Table 2.1: Experian’s Identified and Forecast UK Convenience and Comparison Goods Per Capita Expenditure Growth

Volume Growth per Head (%)	2018	2019	2020	2021	2022	2023	2024	2025	2026-29	2031-40
Convenience goods	-0.2	-1.0	8.6	-1.7	-5.8	-3.0	-0.5	-0.2	0.0	0.1
Comparison goods	0.4	2.9	-7.9	8.1	-3.3	-3.3	-1.2	2.7	3.1	2.8

Source: Figure 1a and Figure 1b of Experian Retail Planner Briefing Note 21

- 2.15 Whilst the above figures identify a level of growth which is significantly below that which has historically been achieved, the situation for high street stores is exacerbated through the increasing amount of expenditure which is committed through special forms of trading³ and, in particular, through online sales.
- 2.16 The below Table 2.2 sets out Experian’s identified and forecast level of special forms of trading as a proportion of overall convenience and comparison goods expenditure. Experian estimates that special forms of trading will account for just under four out of every ten pounds spent on comparison goods and almost a quarter of convenience goods expenditure at 2034.

Table 2.2: Experian’s Identified and Forecast Market Share of Non-Store Retail Sales for Convenience and Comparison Goods Sectors

Volume Growth Per Head (%)	2018	2019	2020	2021	2022	2023	2024	2029	2034	2039
Convenience goods	10.8	12.9	17.1	19.2	16.4	15.8	17.3	21.2	23.3	24.6
Comparison goods	21.8	25.0	39.2	37.9	31.5	30.4	32.5	36.5	38.5	39.7

Source: Figure 5 of Experian Retail Planner Briefing Note 21

- 2.17 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 some opportunities for retailers trading from the high street. In particular, many stores sell online but fulfil orders from regular stores rather than warehouses⁴, 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. These figures are provided in Table 2.3 below. The figures demonstrate the high proportion of online sales which are fulfilled from physical stores, and therefore the importance of retaining this offer on our high streets.

Table 2.3: Experian’s Identified and Forecast Adjusted Market Share of Non-Store Retail Sales for Convenience and Comparison Goods Sectors

Volume Growth Per Head (%)	2018	2019	2020	2021	2022	2023	2024	2029	2034	2039
Convenience goods	3.2	3.9	5.1	5.8	4.9	4.7	5.2	6.3	7.0	7.4
Comparison goods	16.3	18.8	29.4	28.5	23.6	22.8	24.3	27.4	28.8	29.7

Source: Figure 5 of Experian Retail Planner Briefing Note 21

Convenience Goods

- 2.18 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. Indeed, analysis from Kantar has identified that

³ Including internet sales, mail order, stalls and markets, door-to-door and telephone sales.

⁴ 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.

the traditional ‘big four’ supermarket operators are no longer such, with Aldi’s market share overtaking that of Morrisons as of December 2023.

- 2.19 Mintel⁵ finds that the decline of the food superstore is well established and that this can be attributed to two matters.
- 2.20 Firstly, people are undertaking food shopping in different ways. More people are living in town and city centres, and are generally purchasing their own home at a later age than was previously the case.⁶ Mintel indicates that such people are more likely to undertake food shopping on an ‘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 weekly ‘main food shop’.
- 2.21 Secondly, the current uncertainty in the economy has made discount foodstore operators (namely Aldi and Lidl) a more attractive proposition, and many such foodstores are 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 of goods, fresh foods, and premium products becoming increasingly prevalent. It is evident that the likes of Aldi and Lidl are no longer ‘hard discounters’ in quite the same way they once were, as they now fulfil a wider range of customers’ needs by offering a greater range of products. The move towards the middle ground has allowed discounters to secure market share from both superstores and smaller convenience stores. In addition, we note that discount retailers are often happy to trade alongside more upmarket convenience goods retailers (such as M&S Foodhall) as, collectively, the two stores can meet a comprehensive range of grocery shopping needs.
- 2.22 The shifts in the sector are illustrated with reference to changes in retailers’ market share in recent years, as shown in Table 2.4.

Table 2.4: Market Share of Convenience Goods Operators

Operator	December 2016	December 2017	December 2018	December 2019	December 2020	December 2021	December 2022	December 2023
Tesco	28.4%	28.1%	27.8%	27.4%	27.3%	27.9%	27.5%	27.6%
Sainsbury's	16.5%	16.5%	16.1%	16.0%	15.9%	15.7%	15.5%	15.8%
Asda	15.3%	15.3%	15.2%	14.8%	14.3%	14.2%	14.0%	13.6%
Morrisons	10.8%	10.8%	10.6%	10.3%	10.4%	10.1%	9.1%	8.8%
Aldi	6.2%	6.8%	7.4%	7.8%	7.4%	7.7%	9.1%	9.3%
Co-op	6.3%	5.8%	5.9%	6.1%	6.0%	5.8%	5.6%	5.4%
Lidl	4.6%	5.0%	5.3%	5.9%	6.1%	6.3%	7.2%	7.7%
Waitrose	5.1%	5.2%	5.0%	5.0%	5.0%	5.1%	4.7%	4.6%
Iceland	2.2%	2.2%	2.2%	2.3%	2.5%	2.4%	2.5%	2.4%
Symbols & Independent	1.8%	1.7%	1.5%	1.6%	1.7%	1.6%	1.4%	1.4%
Other Outlets	1.7%	1.6%	1.7%	1.6%	1.8%	1.8%	1.8%	1.8%
Ocado	1.1%	1.1%	1.2%	1.3%	1.6%	1.7%	1.7%	1.7%

Source: KANTAR Grocery Market Share. Figures shown are for the final reporting period in each calendar year

⁵ ‘UK Retail Rankings’, Mintel, April 2018.

⁶ Article headlined ‘Average UK first-time buyer is now older than 30, says Halifax’, The Guardian, January 2022.

2.23 The past few years has seen the closure of a number of unprofitable grocery stores (from small convenience stores to large superstores) and the continuation of Aldi and Lidl's expansion programme. Aldi announced in September 2023 that it intends to open another 500 stores in the coming years.⁷ Lidl intends to open a further 250 stores across the UK.⁸ Whilst the traditional 'big four' remain more cautious in respect of new openings, a limited number of proposals for mid-sized foodstores are currently being promoted by these operators in areas where there is a growing population, or an obvious shortfall in existing provision. These stores are often of a scale that is broadly comparable to that provided by Aldi and Lidl, which allows customers to shop in a convenient and efficient manner.

Comparison Goods

2.24 The comparison goods sector is currently being squeezed by a number of factors, including increasing operator costs and a reduction in discretionary spending as a result of increases in the cost of living.

2.25 Whilst the sector is continually evolving and there are a number of retailers performing well (including JD Sports, Next, Primark, and Zara), recent headlines have focused on failing retailers and store closures. High profile retailers that have struggled include Debenhams, which announced the closure of all 124 stores in December 2020⁹, and the Arcadia Group, which owned Topshop, Topman and Dorothy Perkins. Arcadia Group announced the closure of around 500 stores in February 2021.¹⁰ Furthermore, Intu Properties, one of Britain's biggest shopping centre owners, fell into administration in June 2020 after failing to secure an agreement with its creditors.¹¹ More recently, Wilko entered into administration in August 2023 and ceased trading shortly after, and The Body Shop announced the closure of 75 stores at the end of February 2024, after falling into administration.

2.26 Whilst the loss of some of the above names will have significant repercussions for certain towns (particularly those that have lost one or more of Debenhams, Marks & Spencer, or House of Fraser from their high street), some well-known retailers have failed to 'move with the times' and update their offer, accommodation, and online presence. This is partly a consequence of retailers struggling to reinvest in their business when margins are tight (or non-existent).

2.27 Many operators have also rationalised their portfolio with the aim of serving the UK by concentrating on larger centres, supplemented by a strong online presence. It will be interesting to see whether any permanent change in respect of working from home may act to counterbalance this 'polarisation' trend, given the prospect of fewer commuters travelling to larger centres and greater numbers of people spending the working day in and around their home. The impact on larger centres may be to reduce footfall, particularly within the week, and result in the shift in expenditure being directed to the smaller town, district, and local centres. Whilst this will be a positive for the smaller centres, larger centres may suffer as a result.

2.28 Whilst structural changes have had a material impact on the vitality and viability of many UK high streets, there are some beneficiaries. Notwithstanding Wilko's recent problems, some 'discount variety' operators – such as B&M Bargains, Home Bargains and Poundland – have taken advantage of lower rents and reoccupied a number of medium to large retail units (as is the case in some of Greater Nottingham's centres). However, as evidenced by recent events, the discount variety market may be approaching capacity.

⁷ Article headlined 'Aldi claims it is increasingly shoppers' main supermarket for weekly shop', The Guardian, 8 September 2023.

⁸ As set out in the press release headlined 'Lidl continues to search to secure sites for new stores', 24 April 2023 (<https://corporate.lidl.co.uk/media-centre/pressreleases/2023/lidl-continues-search-to-secure-sites-for-new-stores>).

⁹ Article headlined 'Debenhams set to close putting 12,000 jobs at risk', BBC, 1 December 2020.

¹⁰ Article headlined 'After Topshop owner Arcadia's demise, what now for UK clothes shopping?' The Guardian, 13 February 2021.

¹¹ Article headlined 'Shopping centre owner Intu collapses into administration', The Guardian, 26 June 2020.

Leisure and Food & Drink

- 2.29 The greater availability of high street units appears to have helped stoke an entrepreneurial spirit in recent years, with a number of centres beginning to benefit from a greater focus on independent retailers and also modern markets, which are frequently focused around food and drink operators.
- 2.30 More generally, the food and drink sector was buoyed pre-pandemic by the success of mid-market national multiples, which expanded quickly across the UK. However, this market has become saturated in many locations and a number of high profile operators have been in financial difficulty. Given the problems suffered by such operators, the market has become more cautious and mid-market operators are picking new sites carefully as a result. Instead, we have seen a number of independent operators flourish, both before and throughout the pandemic, and a desire for customers to choose local operators over larger regional and national brands.
- 2.31 A further significant recent high street success story has been the resurgence of the town centre leisure sector, which has resulted in new cinemas being developed close to the shopping core and the emergence of ‘competitive socialising’ concepts, which include bowling, crazy golf, table tennis, darts, axe-throwing, escape rooms and other seemingly niche pursuits.
- 2.32 Cinema openings have been on the up in the early part of this century (until the Covid-19 pandemic) and ‘boutique’ cinema operators – including Curzon, Everyman, and The Light – are able to operate from smaller sites in town centres (partly as a consequence of digital technology). 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. New, innovative leisure operators have been particularly beneficial both in re-using existing difficult to let premises, and in driving the evening economy.
- 2.33 More generally, the gym market continues to perform well, with there now being around 7,200 health and fitness clubs across the UK, which are estimated to have a total turnover of approximately £2bn.¹² Around one in every seven Britons has a gym membership. Budget gyms are currently particularly popular, with operators such as Pure Gym, the Gym Group, and easyGym utilising a format that is based on low costs and high volume.

The Night-Time Economy

- 2.34 The term night-time economy is used to describe a wide range of activities that (typically) take place after 5 pm. This could range from a trip to the theatre or cinema, to a family meal, to a night out at a club. A successful night-time economy generally caters for a wide range of demographics and interests.
- 2.35 Creating a safe, vibrant and well-balanced evening and night-time offer is a challenge that can dramatically improve the overall health of a town centre and boost the economy.
- 2.36 The Association of Town and City Management (‘ATCM’) has identified a number of themes to help improve the attraction and operation of the night-time economy, which are summarised as follows:
- **Alive After Five** – This relates to revisions to trading hours to better suit customers’ shopping needs and availability. A Retail Trading Hours Study commissioned by ATCM found that sales between 5 pm and 8 pm are typically 50% greater than those between 9 am and 11am. Revising trading hours to open and close later could increase sales by around 10% to 12%.

¹² ‘Number of health clubs in Europe in 2020, by country’ dataset, Statista, 27 October 2022.

- **Late Night Transport** – The lack of frequent, efficient and safe public transport late at night, or at least the perception of this being the case, could be having a detrimental effect on night-time economy and social scene. One way of increasing night-time visitor numbers is to promote late-night travel provision and its publicity.
- **Purple Flag** – This is an accreditation scheme which recognises excellence in the management of town and city centres at night. Obtaining Purple Flag accreditation demonstrates that a town's night-time economy offers clean and safe environments, great bars and clubs, a variety of arts and cultural attractions, and excellent transport links.
- **Evening Economy Ambassadors** – The ambassadors improve the evening and night-time experience in a town centre by liaising between visitors, police, door staff, licensees, and transport operators.
- **Light Night** – This is an initiative where town or city centres stays open after dark for people to enjoy local shops and services within a wider cultural event involving music, art and, most importantly, through the lighting up of buildings and light-based art installations.

2.37 The above list is not exhaustive, and the development of a bespoke evening economy strategy can help prioritise and deliver events and initiatives which draw on a town centre's strengths and address weaknesses.

Planning Reform on the High Street

- 2.38 One of the most impactful planning reforms in recent times has been the consolidation of a number of separate Use Classes under a single Class E 'Commercial, Business and Service' use. This update to the Town and Country Planning (Use Classes) Order 1987 (the 'UCO') came into effect in September 2020. The new Use Class combines shops, restaurants, offices, gyms and nurseries (amongst other uses) such that planning permission is no longer required to switch uses.
- 2.39 Furthermore, in March 2021, an update was made to the General Permitted Development) (England) Order 2015. This allows for the change of use from Class E properties to residential from August 2021 (extending a right that had previously been restricted to office uses). This permitted development right is subject to maximum size requirements, the property having been in use as Class E for two years and having been vacant for three months. An application to the determining authority for 'prior approval' is also required for limited consideration of impacts relating to transport, contamination, flood risk, noise, light, and neighbourhood amenity. Further limitations apply in Conservation Areas and for nurseries, as well as in areas covered by 'Article 4 directions' where permitted development rights are extinguished.
- 2.40 On 20 July 2021, paragraph 53 of a new iteration of the National Planning Policy Framework ('NPPF') set out limitations on the use of Article 4 directions. The revised national policy seeks to qualify the areas in which it is justified to introduce Article 4 directions, limiting local authorities' ability to control development.
- 2.41 The changes in the application of Article 4 directions were first put forward in the January 2021 consultation for draft revisions to the NPPF. However, the actual policy provision differs from the initial consultation in a couple of key areas. Paragraph 53 of the previous NPPF of July 2021 recognised that the loss of the 'essential core of a primary shopping area' could result in wholly unacceptable adverse impacts on an area's vitality and viability. This was the Government's first acknowledgement of the potential for the permitted development rights to undermine the health of centres in the NPPF. The updated text also introduced a requirement for 'robust evidence' to support the removal of development rights. The most recent iteration of the NPPF, published in December 2023, retains these changes.

2.42 This can be seen as generally good news for local authorities concerned about the erosion of retail and service uses, and the need to protect vulnerable centres from potentially poor quality residential development. Protection of the vitality and viability of a high street or town centre against the adverse impacts of change of use is now established as justification for issuing an Article 4 direction.

2.43 In addition to the above, the Levelling-up and Regeneration Act 2023 (LURA) received Royal Assent on 26 October 2023. The Secretary of State for Levelling Up, Housing and Communities, Rt Hon Michael Gove MP, has stated that the new Act:

'...will deliver revitalised high streets and town centres. A faster and less bureaucratic planning system with developers held to account... Communities taking back control of their future with new powers to shape their local area. And our long-term levelling up missions enshrined in law.'

2.44 Most of the provisions of the LURA that pertain to development management and plan-making have no appointed commencement date as yet, given the need for secondary legislation to enact these measures. Notwithstanding, the Act is expected to have a number of important implications for the future of town centres and high streets, including:

- **High Street Rental Auction Process:** Subject to forthcoming regulations to be made by the Secretary of State, the LURA grants local authorities the power to hold rental auctions in respect of 'persistently vacant' commercial premises located on high streets and in defined town centres. The process will require landlords to let these properties to new tenants such as local businesses or community groups. The objective of this measure is to reduce the number of vacant properties and ensure that short to medium-term meanwhile uses can help drive footfall on the high street.
- **Locally-led Urban Development Corporations:** The Act introduces a new power for a local authority, or two or more local authorities acting jointly, to propose to the Secretary of State that s/he designate an area of land as an urban development area and establish a development corporation to lead regeneration in that area. Oversight of these urban development areas and corporations will be the responsibility of the relevant local authority or authorities, rather than central government, with the details of how specific functions will be exercised to be set out in future Regulations by the Secretary of State. Locally-controlled development corporations have the potential to be a powerful tool for the transformation of struggling town centres, having wide-ranging planning and development management powers that can effect large-scale change.
- **Supplementary Plans:** Local planning authorities will be given the ability to prepare Supplementary Plans to address site-specific needs or opportunities which require a new planning framework to be prepared quickly (such as a new regeneration opportunity) or to set out design codes for a specific site or area. Unlike the older Supplementary Planning Documents (SPDs) which they replace, Supplementary Plans will have the weight of the development plan. The LURA allows for the Secretary of State to make Regulations in respect of the preparation, withdrawal or revision of Supplementary Plans. The possible benefits of Supplementary Plans include more speed and certainty for developers of major town centre regeneration projects, with key aspects, such as policies for design, being afforded the same weight as the development plan.
- **Amendments to Legislation on Compulsory Purchase Orders (CPOs):** The LURA amends the existing Town and Country Planning Act 1990 to clarify that local authorities may use their power to acquire land by CPO for the purposes of 'regeneration'. It also modernises and streamlines the current CPO system by, for example, making explicit allowance for online publicity in the Acquisition of Land Act 1981, extending the period within which CPO powers can be exercised, and granting Inspectors the ability to choose the appropriate procedure

to confirm a CPO. These amendments recognise the potential for CPOs to stimulate regeneration in town centres that suffer from concentrations of long-term vacancies within various land ownerships.

- **Changes relating to Pavement Licensing:** The LURA will make permanent the temporary changes to the pavement licensing system introduced by the Business and Planning Act 2020 in response to the Covid-19 pandemic. This will enable high street hospitality businesses to acquire fast-track pavement licenses permitting the placement of removeable furniture along adjacent highways to allow for food and drink to be sold and served outdoors year-round.

Implications for the Newcastle-under-Lyme Authority Area

- 2.45 The above trends have a number of potential implications for retail and leisure provision within Newcastle-under-Lyme.
- 2.46 Newcastle-under-Lyme is the Borough's principal town centre and contains the greatest variety of shops, services, and facilities. However, the centre has been impacted by the trends as summarised above and in particular areas such as the Roebuck Shopping Centre and York Place Shopping Centre comprising a number of vacant units, some of which are larger in scale. As we go on to explore in more detail later in this Study however, whilst there has been a recorded decline in comparison provision and a rise in vacancy rates since the previous Retail Study the planned redevelopment of the Ryecroft site and other committed investments represent significant opportunities to ensure the future resilience of the town centre and support its wider regeneration.
- 2.47 In addition, as detailed in the full healthcheck set out in Appendix 3, Kidsgrove is set to benefit from £16.9m of Town Deal funding and a £600k grant from the UK Shared Prosperity Fund for strategic developments and projects, including a refurbishment to Kidsgrove Rail Station and a new Shared Services Hub in the town centre. This investment, together with the other initiatives explained in the full healthcheck, has the potential to significantly benefit the town centre through increased connectivity and footfall.
- 2.48 It is evident that the two town centres in particular benefit (to varying degrees) from the presence of convenience goods retailers within or around the centre. In particular, Newcastle-under-Lyme is surrounded by large format convenience operators, and although not within the centre of Kidsgrove, residents are able to access large format convenience operators within an easy walking distance (or short distance by car/public transport).
- 2.49 In this context, we note that a number of grocery operators remain acquisitional. Lidl's website¹³ identifies that it has a current outstanding requirement for new stores in the borough. It will be important to try to direct any future foodstore requirements to central, sustainable locations which have the potential to support linked trips to in-centre retailers and service providers (in line with 'town centre first' principles).
- 2.50 Given changes in the retail sector, it will be important to consider whether there are any opportunities for the principal centres within Newcastle-under-Lyme to provide a greater experiential offer to attract activity and encourage visitors to stay for longer periods. The independent and food and drink sectors are likely to be a particularly important in this regard. There may also be a benefit in actively managing centres to assist with their general maintenance and to help allow for greater differentiation between different centres' respective offers.
- 2.51 There is a need for flexibility in planning for town centres, so they can adapt to future needs and accommodate a wider range of uses. This is particularly important following the Covid-19 pandemic to help sustain the recovery of high streets and to ensure that they meet local needs in a sustainable manner. The borough's centres are not

¹³ [New Store Site Requirements \(realestate-lidl.co.uk\)](https://www.realestate-lidl.co.uk), consulted on 20 May 2024

principally sustained through an influx of office workers, and any longer-term trend to working from home may provide some potential for residents to use nearby centres during the week and particularly at lunchtime.

- 2.52 In this regard, as we go on to explore in greater detail in this report, we recommend that the authority ensures that policies are sufficiently flexible to allow for a wide range of town centre uses beyond retail, and that consideration is given to repurposing surplus stock to support new residential, leisure and community uses.

3. Planning Policy Context

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 considering retail and town centre development plan policy as set out in the current development plan. We also consider changes to the Use Classes Order and the application of permitted development rights to town centre uses.

Revised National Planning Policy Framework

3.2 The most recent iteration of the National Planning Policy Framework ('NPPF') was published in December 2023. The NPPF reflects the fact that the traditional role of town centres has been somewhat undermined by structural changes in the retail sector, and that there may be a need to plan for a more diverse range of uses going forward. As such, the NPPF advocates a more flexible policy framework to support the future vitality and viability of town centres.

3.3 NPPF policies are considered on a thematic basis below.

Plan-Making

3.4 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.

Building a Strong, Competitive Economy

3.5 Paragraph 85 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.

Ensuring the Vitality of Town Centres

3.6 Paragraph 90 specifically relates to planning for town centres. It states that:

'Planning policies should:

- a.** define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;
- b.** define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;
- c.** retain and enhance existing markets and, where appropriate, re-introduce or create new ones;
- d.** allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;
- e.** 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. If sufficient edge of centre sites cannot be identified, policies

should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and

- f. recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.’

- 3.7 The requirement to plan to meet needs across a minimum ten-year period represents a change from the previous NPPF which required town centre needs to be met in full across the entire plan period.
- 3.8 In addition, it is notable that the NPPF Annex 2 Glossary fails to make any reference to the designation of primary and secondary frontages. Page 32 of the Government Response to the Draft Revised National Planning Policy Framework Consultation¹⁴ indicates that, whilst the revised NPPF has removed the expectation in national planning policy that such frontages must be defined, this does not necessarily preclude authorities from doing so where their use can be justified. However, it is evident that the general intention is to provide for more flexibility through a less prescriptive approach to land use.
- 3.9 Paragraph 94 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 test.

Promoting Healthy and Safe Communities

- 3.10 Paragraph 97 seeks to support the social, recreational, and cultural facilities and services communities need. The guidance states that planning policies and decisions should:
- plan positively for the provision and use of shared spaced, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses, and places of worship), and other local services to enhance the sustainability of communities and residential environments;
 - take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
 - guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;
 - ensure that established shops, facilities, and services are able to develop and modernise, and are retained for the benefit of the community; and
 - ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Ensuring the Vitality of Town Centres Planning Practice Guidance

- 3.11 The Town Centres and Retail Planning Practice Guidance (‘the Town Centres PPG’) was published in July 2019 and thereafter updated in September 2020. It provides 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.
- 3.12 Paragraph 004 of the Town Centres PPG indicates that a local planning authority’s strategy for their town centres

¹⁴ Published July 2018.

should include:

- The realistic role, function and hierarchy of town centres over the plan period. Given the uncertainty in forecasting long-term retail trends and consumer behaviour, this assessment may need to focus on a limited period (such as the next five years) but will also need to take the lifetime of the plan into account and be regularly reviewed.
- The vision for the future of each town centre, including the most appropriate mix of uses to enhance overall vitality and viability.
- The ability of the town centre to accommodate the scale of assessed need for main town centre uses, and associated need for expansion, consolidation, restructuring or to enable new development or the redevelopment of under-utilised space.
- How existing land can be used more effectively – for example, the scope to group particular uses such as retail, restaurant and leisure activities into hubs or for converting airspace above shops.
- Opportunities for improvements to the accessibility and wider quality of town centre locations, including improvements to transport links in and around town centres, and enhancement of the public realm.
- What complementary strategies are necessary or appropriate to enhance the town centre and help deliver the vision for its future, and how these can be planned and delivered. For example, this may include consideration of how parking charges and enforcement can be made proportionate.
- The role that different stakeholders can play in delivering the vision. If appropriate, it can help establish the level of cross-boundary/strategic working or information sharing required between both public and private sector groups.
- Appropriate policies to address environmental issues facing town centres, including opportunities to conserve and enhance the historic environment.

3.13 This Study seeks to provide a high-level authority-wide retail and leisure strategy, which will provide an overall context to the determination of planning applications for such uses and will support the Council's future development plan policy. The Study will also help underpin future town centre-specific strategies or masterplans.

3.14 Paragraph 006 of the Town Centres PPG identifies a series of key indicators of relevance in assessing the health of a centre over time. The indicators allow the role, performance, and function of centres to be monitored and are considered in greater detail at Section 4 of this report (which specifically addresses the vitality and viability of Newcastle-under-Lyme's principal centres).

Use Classes Order

3.15 Significant changes to the Use Classes Order have been enacted through the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, which came into force on 1 September 2020.

3.16 The amendments include the revocation of Parts A and D, and the introduction of three new Use Classes, these being Classes E, F1 and F2. The Government's objective is that the changes will support the revival of the high street and allow for greater flexibility in changing uses within town centres without the need for planning permission.

3.17 In addition to the three new Use Classes, the changes also result in some changes in respect of uses classified as *sui generis*. In practical terms, the changes comprise:

- **Use Class E** – Commercial, business and service uses include: shops or retail; cafes or restaurants; financial services; professional services; any service appropriate to provide in a commercial, business or service

locality; indoor sports, recreation or fitness; medical or health services; crèche, day nursery or day centre; and, offices.

- **Use Class F1** – Learning and non-residential institutions include any non-residential use for the: provision of education; display of works of art; museum; public library or public reading room; public hall or exhibition hall; for or in connection with public worship or religious instruction; or, as a law court.
- **Use Class F2** – Local community uses include: a shop selling mostly essential goods, including food, no larger than 280 sq.m and where there is no other such facility within 1,000 metres radius of the shop’s location. A hall or meeting place for the local community, an area or place for outdoor sport or recreation and an indoor or outdoor swimming pool or skating rink.
- **Sui Generis** – Use within this Class now include a public house, wine bar or drinking establishment; a drinking establishment with expanded food provision; a hot food takeaway for the sale of hot food where consumption of that food is mostly undertaken off the premises; live music venue; cinema; concert hall; bingo hall; or, dance hall.

3.18 The introduction of Class E is significant and places a wide range of uses including retail, food, financial services, gyms, healthcare, nurseries, offices, and light industry into a single use class. Unless restrictive planning conditions extinguish the provisions of Class E, the ability to significant change the commercial use of premises without planning permission allows centres to evolve in a flexible manner.

3.19 However, the provisions of the Use Classes Order are not linked to any spatial considerations. As such, the expanded Use Class E applies equally to both town centres and out of centre locations, and there may be unintended consequences in providing for additional flexibility across Class E outside of town centres. Accordingly, it may be necessary for the Council to apply restrictive conditions to certain forms of development to restrict the authorised use to that which has been justified in the application submission. This will help ensure that unacceptable impacts do not arise from future Class E development.

Town Centre Use Permitted Development Rights

3.20 An amendment was made to the General Permitted Development) (England) Order 2015 (the ‘GPDO’) in March 2021. This allows for the change of use from Class E properties to residential from August 2021 (extending a right that had previously been restricted to office uses). This permitted development right is subject to maximum size requirements, the property having been in use as Class E for two years, and the property having been vacant for three months. In addition to this, ‘prior approval’ for the change of use must be sought from the planning authority. Restrictions on this right apply in conservation areas and for nurseries and health centres, as well as in areas that are covered by an Article 4 direction.

Local Planning Policy Context

Adopted Development Plan

3.21 The currently adopted development plan for the authority area comprises the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy, adopted in October 2009, along with the saved policies of the Newcastle-under-Lyme Local Plan, adopted in October 2003.

3.22 Policy SP1 of the Core Spatial Strategy states that retail and office development will be focused towards the City Centre and Newcastle town centre. It goes on to state that development in other centres will be of a nature and scale appropriate to their respective position and role within the hierarchy of centres.

3.23 Policy ASP4 then relates to the Newcastle Town Centre Area Spatial Policy, and sets out that the town centre will provide for an additional 25,000 sq.m of comparison retail floorspace by 2021, and a further 10,000 sq.m by 2026. The Policy also states that:

- As one of the two strategic centres in the conurbation, the Town Centre will continue to develop in a balanced way as a complementary service centre to the City Centre with a strong retail offer, a strengthened financial and professional sector, and as a focus for new leisure and residential opportunities, all accommodated within mixed development wherever practicable.
- The Town Centre's unique market town character and ambience will be enhanced through directing public investment and developer contributions towards enhancing the attractiveness and viability of the Open Market and the Town Centre's award winning public realm and open spaces. A greater mix and intensity of Town Centre uses will be encouraged to create a stronger gateway to the Town Centre from the north and north west and to capitalise on natural features such as the Lyme Brook, so long as the main function of the primary shopping area is maintained and enhanced.
- A spatial framework will be formulated, identifying distinct zones both within the primary shopping area and beyond, aimed at maintaining their distinctive characters and helping to break through the perceived barrier of the inner ring road.
- All development within the Town Centre will work with the topography and be required to meet the high quality design standards set out in supplementary planning documents and in keeping with the Town Centre's distinctive market town character, and will enhance the vitality and viability of the Town Centre by contributing towards the existing vibrant mix of retail, nightlife, leisure, employment and residential uses. New development will recognise the importance of landmark sites and work to improve connections to and within the Town Centre and particularly the need to overcome the severance created by the inner ring road.
- The Borough Council will work with partners to help to secure a new leisure complex on land within or adjacent to the Town Centre.
- Links with Keele University and Science Park, the University Hospital of North Staffordshire and Newcastle College of Further Education will play a key role in marketing the town as a university town and place for research and learning.

3.24 Paragraphs 3.27 to 3.37 of the Core Spatial Strategy also provides details of the hierarchy of centres, focusing on the larger centres both within Newcastle and Stoke, noting that:

- Newcastle Town Centre – possesses a vibrant retail sector which complements that offered by the City; a strong evening/night - time economy and a strong financial and professional services sector; all set within a distinctive, historic market town environment. Newcastle also plays a key role as a university town. It is identified as a strategic centre in the Regional Spatial Strategy; and
- Kidsgrove Town Centre – located at the northern edge of the plan area, Kidsgrove primarily provides food shopping and services to meet local needs.

3.25 Paragraph 3.37 also acknowledges that there are a series of smaller centres which play an important role in the wider hierarchy.

3.26 Section 4 of the 2003 Local Plan sets out the saved retail and town centre policies for Newcastle-under-Lyme. The policies are summarised below:

- Policy R12 – Development in Kidsgrove Town Centre – encourages development for retail or leisure uses within or close to Kidsgrove town centre, so long as the development will not harm the vitality and viability of the centre and any opportunities to improved conditions for pedestrians should be explored.

- Policy R13 – Non-retail Uses in Kidsgrove Town Centre – notes that the Council will consider the effect of non-retail uses in the town centre.
- Policy R15 – Development in District Centres – states that new development or redevelopment for retail or leisure uses within or close to the district centres of Chesterton, Silverdale and Wolstanton will be encouraged so long as the likely catchment for the development would be appropriate, that the development would not harm the vitality and viability of the centre and any opportunities to improve conditions for pedestrians should be exploited.
- Policy R16 – Non-retail Uses in District Centres and Other Groups of Shops – states that applications for change of use from retail to non-retail uses will be considered by the Council in terms of the potential implications on the centres and the ongoing offer of the centres to the local catchments.

Emerging Development Plan

- 3.27 On 13 January 2021, the Council resolved to undertake a new local plan for the borough. Following consultation on the Issues and Strategic Options in 2021/2022, the Council consulted on the first draft of the local plan between 19 June and 14 August 2023.
- 3.28 The new Plan will provide the key set of policies and site designations that will inform future planning applications and contribute to the achievement of sustainable development.
- 3.29 Chapter 10 of the first draft of the Local Plan relates to retail. Policy RET 1 provides the draft policy guidance which seeks to protect, promote and retain the long-term vitality and viability of retail centres in the Borough and begins by providing the hierarchy of centres within the borough as follows.

Figure 3.1: Retail Hierarchy provided by Policy RET 1 of the First Draft Local Plan

Role and tier in settlement hierarchy	Centre Name	Centre(s)
Strategic Centre	Strategic Town Centre	Newcastle-under-Lyme Town Centre
Urban Centre	Urban Town Centre	Kidsgrove Town Centre
Rural Centre	Rural Centre	Loggerheads (Eccleshall Road), Madeley (Newcastle Road), Baldwin's Gate (Newcastle Road) and Audley (Church Street)
	District Centres	Chesterton (London Road), Silverdale High Street and Wolstanton High Street
	Neighbourhood Centres	Bradwell (Hanbridge Avenue), Butt Lane (Congleton Road), Chesterton (Barbridge Road), Clayton (Cambridge Drive), Clayton (Clayton Road, opposite Abbot's Way), Cross Heath (Liverpool Road), Knutton (Knutton Lane), May Bank (High Street), Rookery (High Street), Newcastle Town (George Street, Eastern End), Parksite (Bath Road), Porthill (Watlands View), Seabridge (Tyne Way), Talke (High Street), Thistleberry (Paris Avenue), Thistleberry / Town (Higherland / Drayton Street), Westlands (Windermere Road), Westbury Park (Westbury Road).

- 3.30 Policy RET 1 then goes on to provide specific policy guidance as follows:

- Development proposals should reflect the role, function, and character of each centre in the retail hierarchy.
- Town Centre and Primary Shopping Area boundaries for the Strategic Centre and Urban Centre are shown on the Policies Map.
- Development proposals for use class E (a) retail development or investment to enhance existing use class E(a) retail provision will be supported within the Primary Shopping Area and Rural, District and Neighbourhood Centres.
- Development proposals for main town centre uses outside of defined centres should satisfy the requirements of the sequential test as set out in national planning policy.
- Development proposals for retail and leisure uses that are located on the edge or outside of a defined centre, are not in accordance with an up to date plan and exceed the floorspace thresholds set out below, will have to demonstrate that they would not have a significant adverse impact in the terms set out in the National Planning Policy Framework where:-
- The proposal provides a gross floorspace in excess of 500 sqm gross: or
 - The proposal is located within 800 meters of the boundary of a district, rural or neighbourhood centre and is in excess of 200 sqm gross.
 - Retail convenience and comparison floorspace needed arising in the Borough over the Plan period will be met primarily through further retail development focused on sites in the Strategic and Urban Town Centre boundaries.

4. Healthcheck Assessments and Land Use

Introduction

- 4.1 Paragraph 90 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.
- 4.2 Paragraph 006 of the Town Centres PPG identifies a range of indicators that should be assessed over time in reviewing the health of a town centre. The indicators include the following:
- diversity of uses;
 - proportion of vacant street level property;
 - retailer representation and intentions to change representation;
 - pedestrian flows;
 - accessibility;
 - perceptions of safety and occurrence of crime;
 - the state of town centre environmental quality;
 - the balance between independent and national multiple retailers; and
 - the extent to which there is an evening and night-time economy offer.
- 4.3 New healthcheck assessments have been undertaken for the town centres of Newcastle-under-Lyme and Kidsgrove. The detailed healthcheck assessments are provided at Appendix 3 and we provide a summary of the key conclusions below.
- 4.4 The assessments are based on site visits which were undertaken in April 2024. These assessments should be taken as a 'snapshot' of the performance of each centre at a moment in time.
- 4.5 In addition, Nexus has produced a matrix to determine how the commercial provision is performing in the Borough's rural, district and neighbourhood centres (as proposed in the First Draft Local Plan 2020-2040) and, as such, where they should sit in the recommended hierarchy.
- 4.6 The matrix is based on an assessment of the provision of facilities, ATM services and the proportion of national operators, types and scale of facilities provided and vacancies which are located in each centre. The matrix is also provided at Appendix 4 and we again provide a summary of the key conclusions below.

Newcastle-under-Lyme's Town Centres

- 4.7 The composition of each of the two principal centres in the Borough of Newcastle-under-Lyme is set out at Table 4.1 below. As the table highlights, the prevailing vacancy rate in respect of units in Newcastle-under-Lyme town centre (22.8%) substantially exceeds the national average of 14.0%. Conversely, the unit vacancy rate in Kidsgrove town centre (12.3%) is lower than the UK average.
- 4.8 We provide a summary of the vitality and viability of Newcastle-under-Lyme's centres below.

Table 4.1: Newcastle-under-Lyme’s Centres Unit Composition at April 2024

Centre	Total Units	Comparison	Convenience	Financial	Leisure	Retail Service	Vacant
Newcastle-under-Lyme TC	100.0%	20.2%	10.1%	6.2%	26.1%	14.5%	22.8%
Kidsgrove TC	100.0%	18.5%	12.3%	3.7%	19.8%	33.3%	12.3%
National Average	100.0%	26.8%	9.3%	8.7%	25.4%	15.8%	14.0%

Source: Composition of principal centres derived from Nexus Planning survey of April 2024; Experian Goad national averages at March 2024.

Newcastle-under-Lyme Town Centre

4.9 The principal centre in the Borough, Newcastle-under-Lyme town centre, is focussed around a historic market core which is reflected in the high quality and attractive environment of the centre. The range of operators in the centre is considered to be sufficient to support its strategic role and function, albeit that the comparison offer in the centre has reduced in size and diversity since the previous survey. Using the centre boundary as identified by Experian Goad, a total of 337 units were recorded comprising a total gross floorspace of 89,740 sq.m.

Table 4.2: Composition of Newcastle-under-Lyme Town Centre

	Floorspace (sq.m)	Floorspace (%)	Floorspace UK Average (%)	Units	Units (%)	Units UK Average (%)
Comparison	18,640	20.8	29.7	68	20.2	26.8
Convenience	19,350	21.6	15.5	34	10.1	9.3
Financial Service	5,460	6.1	6.3	21	6.2	8.7
Leisure Service	24,050	26.8	26.6	88	26.1	25.4
Retail Service	8,080	9.0	7.3	49	14.5	15.8
Vacant	14,160	15.8	14.0	77	22.8	14.0
Total	89,740	100.0	100.0	337	100.0	100.0

Source: Composition of centre derived from Nexus Planning survey of April 2024; UK Average from Experian Goad report of March 2024

- 4.10 Newcastle-under-Lyme’s daytime economy is underpinned by its varied retail and service offer, with its edge-of-centre convenience anchors providing key support by attracting trade and footfall via linked trips. The centre serves a diverse catchment, including residents of the surrounding suburbs and students of the nearby Keele University (some of whom reside in accommodation located within the town centre boundary).
- 4.11 A strength of the town centre is its leisure offer, which includes the large-footprint leisure uses at Lymelight Boulevard (which encompasses a Vue Cinema, escape rooms, laser quest, an indoor climbing centre, a soft play area, bowling lanes, and food and drink facilities), many of which are family-oriented. The food and drink offer of the centre is also strong, with licensed premises concentrated along Ironmarket and High Street, supported by a number of takeaways and fast food restaurants. Much of the provision is aimed at the student population. These uses ensure that Newcastle-under-Lyme benefits from activity late into the evenings.
- 4.12 Since the previous survey was undertaken for the 2019 Retail Study, there has been a net loss of 29 non-food retail units in the centre, equating to a loss of 7,150 sq.m of comparison floorspace. The decline in comparison retail provision is considered to reflect a number of factors, including: the unsuitability of much of Newcastle-under-Lyme’s historic commercial stock for many modern retailers; competition from Hanley, which lies just 3.5km to the east of the town centre; and the challenges faced by the wider UK retail market since 2019, including the impacts of Brexit, the Covid-19 pandemic, and rises in the cost of living.

- 4.13 In this context, we note that the vacancy rates in the town centre have increased since the time of the previous survey, both in terms of floorspace (the proportion of which has risen from 13.3% to 15.8%) and units (18.1% of the centre's commercial premises were unoccupied in 2018, compared to 22.8% in 2024). Newcastle-under-Lyme's vacancy rates are therefore above the national averages of 14.0% of floorspace and 14.0% of units.
- 4.14 It should be noted, however, that our survey visit took place in April 2024, when the York Place Shopping Centre was being emptied of occupiers in advance of its redevelopment (as explained in more detail below). If the York Place vacancies are removed from the table above, then the amount of vacant floorspace in the town centre falls to 12,420 sq.m (14.1%) and the number of vacant units falls to 62 (19.3%). Thus, the ongoing redevelopment of York Place brings the proportion of unoccupied floorspace in Newcastle-under-Lyme in line with the national average, but the proportion of empty commercial units remains well above that found in a typical UK centre. Even accounting for the York Place redevelopment, vacancy rates in the town centre have increased since 2018 in terms of both units and floorspace.
- 4.15 The Roebuck Shopping Centre appears to have been particularly hard hit by the broad trends in the non-food retail sector, having lost a number of national multiple comparison operators in recent years (including Argos, Next and Bonmarche). The Shopping Centre is currently largely empty, although it has had some success in diversifying its offer with the support of the Newcastle-under-Lyme BID, including the opening of the Foundry Gym and other new businesses including a café.¹⁵ Other vacant units are dispersed throughout the town centre and generally well-maintained, which reduces their detrimental impact on the quality of the centre environment.
- 4.16 It is important to note that the town centre's retail offer remains reasonably strong and is sufficient to meet the majority of the day-to-day needs of its users, but the recorded decline in comparison shopping provision over the past few years and the accompanying rises in vacancy rates reinforce the importance of planned investments and efforts to diversify the centre offer. These interventions will be key to ensuring the resilience of Newcastle-under-Lyme and securing its wider regeneration.
- 4.17 In this regard, the town centre is set to benefit from an extensive programme of commercial and economic development led by the Borough Council and its partners, which include the Newcastle BID, Staffordshire County Council, Aspire Housing, Keele University and the local community. As detailed in the full healthcheck in Appendix 3, the Council has secured £39.4m of grant funding from a number of sources (including the Future High Streets Fund, the Town Deal and the UK Shared Prosperity Fund) which will be invested in strategic projects to benefit Newcastle-under-Lyme
- 4.18 A key development opportunity is the Ryecroft site in the north of the town centre, together with the former York Place Shopping Centre and the existing Midway Car Park area at the lower end of High Street. These three linked sites will be redeveloped for a mix of uses, including a new multi-storey car park, residential and commercial space, a potential mid-range hotel, shop and office space, and public open space. This significant planned large-scale development, together with the other interventions detailed in the full healthcheck, have the potential to revitalise the town centre by bringing new footfall and catalysing further investment.
- 4.19 Our overall conclusion with regard to the health of Newcastle-under-Lyme town centre is that it is reasonably vital and viable. While the recorded decline in comparison provision and rise in vacancy rates since the previous Retail Study are concerning, the centre continues to provide a varied retail and service offer which is sufficient to meet the majority of the needs of its diverse catchment. The planned redevelopment of the Ryecroft site and other

¹⁵ See: <https://www.stokesentinel.co.uk/news/stoke-on-trent-news/five-new-stores-cafe-set-8245538> [accessed 20th May 2024]

committed investments represent significant opportunities to ensure the future resilience of the town centre and support its wider regeneration.

Kidsgrove Town Centre

- 4.20 Kidsgrove is located approximately 8 kilometres to the north of Newcastle-under-Lyme Town Centre and is the second largest centre in the Borough, providing for 81 retail, leisure and service units and 10,157 sq.m of commercial floorspace. These premises are focussed around the two parallel shopping streets of Market Street and Liverpool Road, which mostly accommodate relatively small-scale independent traders.

Table 4.3: Composition of Kidsgrove Town Centre

	Floorspace (sq.m)	Floorspace (%)	Floorspace UK Average (%)	Units	Units (%)	Units UK Average (%)
Comparison	3,534	34.8	29.7	15	18.5	26.8
Convenience	1,070	10.6	15.5	10	12.3	9.3
Financial Service	187	1.8	6.3	3	3.7	8.7
Leisure Service	1,704	16.8	26.6	16	19.8	25.4
Retail Service	2,538	25.0	7.3	27	33.3	15.8
Vacant	1,119	11.0	14.0	10	12.3	14.0
Total	10,157	100.0	100.0	81	100.0	100.0

Source: Composition of centre derived from Nexus Planning survey of April 2024; UK Average from Experian Goad report of March 2024

- 4.21 Retail and leisure services, particularly health & beauty and takeaway operators, form the predominant uses in Kidsgrove. The convenience offer is influenced by the proximity of edge- and out-of-centre Tesco, Lidl and Aldi supermarkets, with the in-centre retailers catering much more for top-up shopping than main grocery shopping trips. Comparison retail provision is more diverse, with a reasonable variety of operators for a centre of this size.
- 4.22 Convenience retailers accounting for 10.6% of the town centre’s floorspace, which is below the national average of 15.5%. The relative lack of convenience floorspace in the town centre reflects the proximity of the edge-of-centre Tesco superstore approximately 150m to the northwest of the boundary and the out-of-centre Lidl and Aldi supermarkets located around 400m and 350m respectively to the northwest and southwest. These large-format supermarkets are the focus of the majority of main shopping trips for residents of Kidsgrove’s catchment, while the town centre operators function as ‘top-up’ shopping destinations. As a consequence, six of the ten convenience retailers in Kidsgrove fall into the convenience stores/CTN category, and these are supplemented by three bakers/confectioners and a butcher. Most operators are independent, although there is some national multiple representation.
- 4.23 While Kidsgrove’s proportion of non-food retail floorspace (34.8%) is above the national average of 29.7%, this finding is largely attributable to the large-format Home Bargains store on Market Street. Indeed, the proportion of comparison units in the town centre (18.5%) is well below the national average (26.8%), likely in part as a reflection of the broad range of non-food goods available at the nearby Tesco superstore (and to a lesser extent the Lidl and Aldi supermarkets). Home Bargains is the only national multiple non-food retailer and clearly plays a significant role in drawing trade and footfall. Nonetheless, the town centre benefits from a fairly diverse range of independent comparison operators. Overall, Kidsgrove has a reasonable provision of comparison operators which are suitable to serve the needs of the local community.

- 4.24 Kidsgrove benefits from a reasonable range of retail, leisure, and financial and business service operators for a centre of its size, which is considered adequate to meet most of the day-to-day needs of the walk-in catchment. However, the service offer does lack diversity, with over 80% of the retail service traders being health & beauty operator and with the financial and business services offer being entirely composed of estate agents (following the closure of the centre's Barclays bank in 2023). Leisure provision is below UK averages in terms of floorspace and units and we consider that the town centre's evening economy is limited, particularly outside of the Market Street area where there is a concentration of takeaways.
- 4.25 The number of vacant premises in Kidsgrove has doubled from five (6.4% of the units in the centre) to ten (12.3%) since the time of the August 2018 survey undertaken for the 2019 Retail Study. The town centre's proportion of vacant floorspace has risen even more significantly, from 363 sq.m (3.6% of the total) in 2018 to 1,119 sq.m (11.0%) in 2024. At the time of the most recent survey, the unoccupied premises were concentrated around the junction of Heathcote Street and Liverpool Road. In general, this part of the centre is quieter and appears to benefit less from the footfall generated by Home Bargains on Market Street. While the recorded rises are concerning, it is important to note that these have taken place in the context of a challenging UK market impacted by factors such as the Covid-19 pandemic. Nationally, the floorspace vacancy rate has risen from 9.3% in March 2018 to 14.0% in March 2024, while the unit vacancy rate has risen over the same period from 11.2% to 14.0%. Kidsgrove's own proportions of unoccupied floorspace and units continue to fall below these national averages.
- 4.26 Moreover, as detailed in the full healthcheck set out in Appendix 3, Kidsgrove is set to benefit from £16.9m of Town Deal funding and a £600k grant from the UK Shared Prosperity Fund for strategic developments and projects, including a refurbishment to Kidsgrove Rail Station and a new Shared Services Hub in the town centre. This investment, together with the other initiatives explained in the full healthcheck, has the potential to significantly benefit the town centre through increased connectivity and footfall.
- 4.27 Overall, Kidsgrove functions reasonably well as a retail and service centre catering for a good number of the day-to-day needs of its residential catchment.

Rural Centres

- 4.28 The character of the Newcastle-under-Lyme Borough is a mix of urban and rural, with the western and southern parts in particular being characterised by settlements located some distance from the higher order centres and containing a comparatively small level of service provision which is nonetheless important to the communities which they serve. The retail hierarchy set out in the emerging First Draft Local Plan 2020-2040 identifies four 'rural centres', which provide a significant role in service provision to the local population and contain a number of essential services and facilities in order to meet the day-to-day needs of residents.
- 4.29 The composition of each of the rural centres proposed in the First Draft Local Plan is provided in Table 4.4 overleaf. Three of the four rural centres have a unit vacancy rate lower than the UK average of 14.0%, as identified by Experian Goad in March 2024, these being Baldwin's Gate, Loggerheads and Madeley.

Table 4.4: Rural Centre Unit Composition at May 2024

District Centre	Total Units	Comparison	Convenience	Leisure Services	Retail Services	Financial Services	Vacant
Audley (Church Street)	26	3.8	11.5	30.8	30.8	3.8	19.2
Baldwin's Gate (Newcastle Road)	3	0.0	0.0	33.3	66.7	0.0	0.0
Loggerheads (Eccleshall Road)	12	8.3	25.0	33.3	33.3	0.0	0.0
Madeley (Newcastle Road)	10	0.0	40.0	30.0	20.0	0.0	10.0

Source: Composition of centre derived from Nexus Planning survey of April 2024

- 4.30 Audley (Church Street)** is a compact centre with a varied retail and service offer. It is anchored by a Tesco Express and Nisa Local convenience store. The leisure offer is food and drink focussed, comprising four hot food takeaways, two restaurants, a café and a public house. The remaining service provision includes six health and beauty operators, an accountancy firm, a dressmaker and a pet groomer. The offer is considered to be more than sufficient to support Audley's role as a rural centre.
- 4.31** Although a small centre, **Baldwin's Gate (Newcastle Road)** provides retail and service units sufficient to serve the village with a Post Office counter, small general store, a hairdressers and a public house.
- 4.32 Loggerheads (Eccleshall Road)** performs an important function for the local community, with a range of retail and service units within the centre boundary. The rural centre includes a convenience store, Post Office, library and public house. The size of units supports independent businesses that deliver retail services, convenience and leisure uses.
- 4.33 Madeley (Newcastle Road)** provides a range of retail and service units, including two convenience stores, a butchers, two hot-food takeaways, a hairdressers, a barbers, a restaurant and a dental surgery. Madeley therefore performs an important function for the surrounding community.

District Centres

- 4.34** In addition to the rural centres set out above, the retail hierarchy in the First Draft Local Plan identifies three 'district centres', which are located around the Strategic Centre of Newcastle-under-Lyme. District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library. The role and function of these centres is to serve the local population reducing the need for people to travel to reach services and facilities.
- 4.35** The composition of each of the district centres proposed in the First Draft Local Plan is provided in Table 4.5 overleaf. The centres vary in size from 20 units in Chesterton (London Road) to 61 units in Wolstanton High Street. The unit vacancy rates also vary, with Chesterton's rate being below the national average of 14.0% (as recorded by Experian Goad at March 2024) and with Silverdale High Street and Wolstanton High Street's rates both being above that average.

Table 4.5: District Centre Unit Composition at May 2024

District Centre	Total Units	Comparison	Convenience	Leisure Services	Retail Services	Financial Services	Vacant
Chesterton (London Road)	20	25.0	15.0	35.0	15.0	0.0	10.0
Silverdale High Street	28	21.4	14.3	21.4	25.0	0.0	17.9
Wolstanton High Street	61	13.1	14.8	21.3	32.8	3.3	14.8

Source: Composition of centre derived from Nexus Planning survey of April 2024

- 4.36 Chesterton (London Road)** is a compact, linear centre anchored by its Co-op Foodstore and containing a range of retail and service units that adequately serve the needs of the immediate residential catchment. The comparison offer is diverse for a centre of this size, with shops selling a variety of goods including carpets, greeting cards and gifts, hardware/household goods, and second-hand clothes and bric-a-brac. Other operators include five hot food takeaways, two betting offices, two hairdressers/barbers, and a pharmacy.
- 4.37 Silverdale High Street** is diverse and provides a range of services and facilities, including a Post Office and a number of specialist retailers. The majority of stores are independent. The centre is considered suitable to serve the needs of the local area.
- 4.38 Wolstanton High Street** is the primary centre in Wolstanton. It is anchored by an Asda foodstore and includes a wide variety of retail and service units, including a Post Office and a good range of specialist retailers. The centre benefits from a variety of food and drink operators, including two cafes, five takeaways and four public houses/clubs. These are supported by community facilities in the form of a medical centre and two dentists which drive footfall and add to the function of the district centre. The centre is considered to serve the needs of the local population well.

Neighbourhood Centres

- 4.39** In addition to the above, part of the commission was to also visit 19 additional smaller ‘hubs’ of commercial units, identified as ‘neighbourhood centres’ in the First Draft Local Plan 2020-2040. The smaller hubs are concentrated in the east of the authority area and all were identified by the Council in light of their potential to be included within the emerging Local Plan, to provide some degree of protection and control over the smaller terraces of units within the authority area.
- 4.40** Having reviewed the offer, the identified group of commercial units within the proposed neighbourhood centres clearly play a vital role in providing day-to-day facilities for the local catchment, particularly in respect of convenience provision (providing facilities to enable residents to purchase goods such as milk and bread), retail service facilities such as hairdressers and barbers and cafes. A number of hubs also include pharmacies and ATM machines, both of which are needed on a regular basis by local residents.
- 4.41** Details in respect of the hubs assessed for this part of the Study are provided at Appendix 4, which includes recommendations in respect of their designation and boundaries.

5. Population and Expenditure

Study Area and Household Survey

- 5.1 A survey of 1,500 households was undertaken by NEMS Market Research in order to ascertain where residents go to undertake a range of shopping and leisure activities. As set out above, the findings from the household survey utilised for the preparation of the 2019 Study have been used to prepare this Update.
- 5.2 The below Table 5.1 identifies the postcode sectors which define each of the zones. A plan defining the geographic extent of the Study Area and the below zones is provided at Appendix 1.

Table 5.1: Study Area Zones by Postcode Sector

Survey Zone	Postcode Sectors
1 – Hanley	ST1 1, ST1 2, ST1 3, ST1 4, ST1 5, ST1 6, ST2 0, ST2 7, ST2 8, ST2 9, ST4 2, ST4 3
2 – Newcastle West	ST7 8, CW3 9
3 – Longton and Fenton	ST3 1, ST3 2, ST3 3, ST3 4, ST3 5, ST3 6, ST3 7, ST11 9
4 – Stoke	ST4 1, ST4 4, ST4 5, ST4 6, ST4 7, ST4 8
5 – Burslem	ST6 1, ST6 2, ST6 3, ST6 4, ST6 7, ST6 8
6 – Tunstall	ST6 5, ST6 6
7 – Kidsgrove	ST7 1, ST7 4
8 – Biddulph	ST8 6, ST8 7
9 – Rural East	ST9 0, ST9 9, ST10 1, ST10 2, ST10 3, ST10 4, ST13 5, ST13 6, ST13 7, ST13 8
10 – Rural South	ST12 9, ST15 0, ST15 8, ST21 6
11 – Rural North	CW12 1, CW12 2, CW12 3, CW12 4, ST7 2, ST7 3
12 – Newcastle East	ST5 0, ST5 1, ST5 2, ST5 3, ST5 4, ST5 5, ST5 6, ST5 7, ST5 8, ST5 9
13 – Rural West	TF9 2, TF9 4

- 5.3 The above zones were used as the basis for the NEMS household survey, which underpin the quantitative retail capacity assessment which follows at Section 6 of the report and the quantitative leisure capacity assessment at Section 7.
- 5.4 To identify the expenditure claimed by retail destinations (and the capacity which is potentially available to support additional retail and leisure development), the first step is to estimate the population and future convenience and comparison goods expenditure associated with the Study Area.

Study Area Population

- 5.5 The population within each postcode sector and each zone at 2024 has been calculated using Experian Micromarketer G3 data (2022 estimate, which was issued in February 2024). We have confirmed with Council Officers that Experian’s population projections are broadly consistent with the level of growth which is being

planned for across the authority area in practice. Table 5.2 below sets out Experian’s population projections for each zone in the Study Area for reporting years 2024, 2029, 2034, 2039 and 2040.¹⁶

Table 5.2: Estimated Study Area Population by Survey Zone

Zone	2024	2029	2034	2039	2040
1	84,113	85,392	86,453	87,462	87,706
2	14,288	14,542	14,694	14,753	14,742
3	77,752	78,570	79,235	79,962	80,071
4	45,256	45,646	46,020	46,425	46,530
5	42,084	42,464	42,994	43,524	43,610
6	25,573	25,956	26,347	26,747	26,831
7	25,564	26,028	26,475	26,831	26,907
8	20,033	20,175	20,266	20,431	20,478
9	65,709	66,103	66,489	66,880	66,974
10	34,989	36,040	36,874	37,585	37,721
11	57,047	58,234	59,180	59,755	59,860
12	84,250	86,179	87,882	89,458	89,793
13	12,100	12,456	12,750	13,050	13,094
Total	588,758	597,785	605,659	612,863	614,317

Source: Table 1 of Appendix 5

- 5.6 Based on Experian’s population projections, we estimate that the Study Area population will increase from 588,758 persons at 2024 to 614,317 persons at 2040. This equates to an increase of 25,559 persons (or 4.3 over the 16-year period).

Retail Expenditure

- 5.7 In order to calculate per capita convenience and comparison goods expenditure, we have 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. The base year for the Experian expenditure data is 2022. Our methodology takes account of the fact that some special forms of trading expenditure¹⁷ is not available to support retail floorspace, and then allows for increases in per capita expenditure growth on an annual basis.
- 5.8 Figure 5 of Appendix 3 of ERPBN21 provides estimates 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).
- 5.9 We set out Experian’s expenditure growth estimates within the below Table 5.3.

¹⁶ The reporting years relate to five year intervals across the forthcoming plan period (working back from 2040), with an additional reporting year of 2040.

¹⁷ Identified as comprising sales via the internet, mail order, stalls and markets, door-to-door and telephone sales (i.e. all non-store sales).

5.10 In considering special forms of trading, many products which are ordered online are actually sourced from a store’s shelves or stockroom in practice (this is particularly the case with 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. 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 ERPBN21). This allowance indicates that 4.9% of convenience goods expenditure and 23.6% of comparison goods expenditure is ‘lost’ to shops at base year 2022 through special forms of trading purchases.

5.11 Having made an 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 ERPBN21. Experian provides overall growth rates and ‘adjusted’ rates, which account for any additional increases in expenditure lost to special forms of trading. The latest growth rates suggest that growth in comparison goods expenditure should pick up in the next few years as confidence in the economy returns, with this following a number of turbulent years following the start of the Covid-19 pandemic in 2020. The applicable annual per capita growth rates are set out below at Table 5.3.

Table 5.3: Experian Retail Planner Briefing Note 20 Convenience and Comparison Goods Annual Per Capita Growth Rates

Year	Convenience Goods	Convenience Goods ‘Adjusted SFT’	Comparison Goods	Comparison Goods ‘Adjusted SFT’
2022	-2.5	-5.0	6.8	3.3
2023	-2.4	-2.9	-1.9	-2.3
2024	-2.3	-1.0	-4.1	-3.1
2025	-1.7	-0.6	0.4	1.2
2026	-1.0	-0.4	2.5	2.9
2027	-0.8	-0.2	2.1	2.5
2028	-0.7	-0.1	1.9	2.2
2029	-0.6	-0.1	2.0	2.3
2030	-0.6	-0.1	2.0	2.3
2031	-0.5	-0.1	2.1	2.4
2032	-0.5	-0.1	2.2	2.4
2033	-0.4	0.0	2.4	2.6
2034	-0.4	0.0	2.4	2.6
2035	-0.4	0.0	2.4	2.5
2036	-0.3	0.0	2.3	2.5
2037	-0.2	0.0	2.5	2.6
2038	-0.2	0.0	2.5	2.6
2039	-0.2	0.0	2.5	2.6
2040	-0.2	0.0	2.4	2.6

Source: Figure 7 of Appendix 3, Experian Retail Planner Briefing Note 21 (February 2024)

5.12 For convenience goods, Experian does not forecast any per capita expenditure growth across the entire period to 2040.. The position in respect of comparison goods expenditure is more positive.

5.13 This Study utilises the most up to date Experian expenditure data and growth forecasts. However, longer term growth forecasts (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, health

and political climates). As such, assessments of this nature should be reviewed on a regular basis to ensure that forecasts over the medium and longer term reflect changing circumstances.

- 5.14 In this regard, we note that paragraph 90 of the NPPF requires local planning authorities to allocate sites to meet likely town centre needs ‘...looking at least ten years ahead’, which differs from the previous requirement to meet needs across the entire plan period. This change is reflective of turbulent economic conditions and the pace of change within the retail sector in recent years.
- 5.15 By applying Experian’s recommendations in respect of special forms of trading and expenditure growth, we can produce expenditure estimates for each survey zone and the overall Study Area at 2024, 2029, 2034, 2039 and 2040.

Convenience Goods Expenditure

- 5.16 Taking into account the Study Area resident population and the available per capita convenience goods expenditure, we estimate that £1,379.8m¹⁸ of convenience goods expenditure originates within the Study Area at 2024. The below Table 5.4 indicates that available Study Area convenience goods expenditure is forecast to increase to £1,415.8m at 2040.

Table 5.4: Total Available Study Area Convenience Goods Expenditure

2024 (£m)	2029 (£m)	2034 (£m)	2039 (£m)	2040 (£m)
1379.8	1381.7	1395.9	1412.5	1415.8

Note: In 2022 prices

- 5.17 Table 5.5 indicates that this represents an increase of £36.0m (or 2.6%) across the Study Area between 2024 and 2040. Given the static growth in per capita expenditure, this increase can be attributed to growth in the Study Area’s population.

Table 5.5: Growth in Available Study Area Convenience Goods Expenditure

Growth 2024-29 (£m)	Growth 2024-34 (£m)	Growth 2024-2039 (£m)	Growth 2024-2040 (£m)
1.9	16.1	32.7	36.0

Note: In 2022 prices

- 5.18 We have assumed that 75% of available convenience goods expenditure would take the form of main food shopping and that 25% would take the form of top-up shopping (which relates to smaller purchases often made using a basket rather than a shopping trolley).¹⁹
- 5.19 By applying this ratio, we estimate that main food shopping trips account for £1,034.9m of Study Area convenience goods expenditure at 2024, and top-up shopping trips account for £345.0m.

Comparison Goods Expenditure

- 5.20 For comparison goods, Table 5.6 sets out our estimate that the resident population of the Study Area will generate £1,660.9m of comparison goods expenditure at 2024. Available comparison goods expenditure is then forecast to increase to £2,548.7m at 2040.

¹⁸ In 2022 prices, as is every subsequent monetary reference.

¹⁹ This is a standard split applied in undertaking this exercise.

Table 5.6: Total Available Study Area Comparison Goods Expenditure

2024 (£m)	2029 (£m)	2034 (£m)	2039 (£m)	2040 (£m)
1,660.9	1,882.5	2,158.3	2,478.3	2,548.7

Note: In 2022 prices

- 5.21 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 result of further forecast increases in expenditure committed via special forms of trading (most obviously, internet shopping).
- 5.22 As the below Table 5.7 identifies, our assessment estimates that there will be an increase of £887.8m (equating to 53.5%) in respect of Study Area comparison goods expenditure between 2024 and 2040.

Table 5.7: Growth in Available Study Area Comparison Goods Expenditure

Growth 2024-29 (£m)	Growth 2024-34 (£m)	Growth 2024-2039 (£m)	Growth 2024-2040 (£m)
221.6	497.4	817.3	887.8

Note: In 2022 prices

- 5.23 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’, ‘Books, CDs and DVDs’, ‘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 5 of this report.
- 5.24 In considering expenditure growth, it should be noted that not all growth arising within the Study Area is available to support additional floorspace in the Newcastle-under-Lyme area. Instead, account needs to be taken of:
- the market share of expenditure secured by retailers within the Newcastle-under-Lyme area (and the fact that many needs are successfully met outside 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.
- 5.25 These issues are addressed in the assessment of retail capacity provided in Section 6 of this report.

6. Assessment of Retail Capacity

- 6.1 Our retail capacity tables set out our step-by-step approach to estimating the expenditure surplus which is available to support additional retail floorspace and are provided at Appendix 5. A summary of our methodology, together with our findings, is provided below.

General Approach to Estimating Quantitative Capacity

- 6.2 Retail capacity modelling follows the basic principle that:

Available Expenditure minus Expected Turnover of Existing and Committed Floorspace equals Expenditure Surplus or Deficit.

- 6.3 An identified quantitative expenditure surplus indicates that there is capacity to support additional retail floorspace. We summarise the key considerations relating to each component of the equation below.

Available Expenditure

- 6.4 As we set out in Section 5 of this report, expenditure generated within each Study Area 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.

- 6.5 The expenditure available to retailers within the Newcastle-under-Lyme area is calculated with reference to the market share of convenience and comparison goods expenditure secured by retailers located within the authority area.

Surplus/Deficit

- 6.6 The expenditure surplus (or deficit) is calculated by subtracting the turnover of existing and committed floorspace from the available expenditure directed to retailers within the authority area. A surplus figure effectively represents an under-provision of retail facilities within the authority area (and may indicate that additional floorspace could be supported), whereas a deficit would suggest a quantitative over-provision of retail floorspace.

- 6.7 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 itself there is significant variation, with electrical retailers typically having higher sales densities than DIY or furniture retailers.

- 6.8 The turnover of destinations is generally considered with reference to retailers' net sales areas and all of the following floorspace figures are presented on this basis.

- 6.9 Our methodology in calculating comparison goods capacity necessarily departs from that used in considering convenience goods needs. This is because it is difficult to accurately estimate a benchmark turnover for comparison goods floorspace due to the large number of operators and the variation in the trading performance of

floorspace, depending on its location, character, and the nature of the catchment. As a consequence, we adopt the position for comparison goods floorspace that it is trading 'at equilibrium' at base year 2024 (i.e. our survey-derived turnover estimate effectively acts as benchmark).

Future Quantitative Convenience Goods Capacity

- 6.10 In identifying the requirement for additional convenience goods floorspace, the estimated turnover of the existing collective provision (with reference to the shopping patterns established by the household survey) is compared to its benchmark turnover (calculated with reference to company average sales densities and the net convenience goods sales areas of individual stores). The identified benchmark turnover changes across future reporting years to account for Experian's forecasts in respect of the future sales efficiency of convenience goods floorspace).
- 6.11 As Table 6.1 demonstrates, convenience goods floorspace across the authority area has a survey-derived turnover of £290.8m and an expected benchmark turnover of £269.4m. As a consequence, a surplus of £21.0m is identified at 2024, which reduces to a £19.7m at 2029. By 2039, the available convenience expenditure increases to £22.9m and by 2040, the surplus is identified to be £23.3m.

Table 6.1: Quantitative Capacity for Additional Convenience Goods Floorspace in Newcastle-under-Lyme Authority Area

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Inflow (£m)	Surplus Expenditure (£m)
2024	269.4	290.8	0.0	21.4
2029	271.6	291.2	0.0	19.7
2034	273.5	294.2	0.0	20.7
2039	274.9	297.7	0.0	22.9
2040	275.1	298.4	0.0	23.3

Notes: Assumes constant market share (21.1%) of Study Area expenditure claimed by facilities within Newcastle-under-Lyme authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 4b of Experian Retail Planner Briefing Note 21; in 2022 prices

- 6.12 We have consulted with the Council and have been informed of two convenience goods commitments which have come forward since the household survey was undertaken across the authority area. Full details of all relevant commitments are provided by Table 6c of Appendix 5 but principally comprise a new discount foodstore in Kidsgrove and the extension of the M&S at Wolstanton Retail Park. We estimate that commitments will have a turnover of £21.5m at 2024, increasing to £22.0m at 2040.
- 6.13 Table 6.2 below then provides the residual capacity and floorspace requirement taking account of the turnover of the identified commitments within the authority area. Table 6.3 indicates that for the short term and specifically looking at the first ten years, once commitments have been taken into account, there is no identified capacity for additional convenience floorspace. Looking beyond the first ten years and at 2039 and 2040, we have identified a very limited capacity of 100 sq.m.

Table 6.2: Quantitative Capacity for Convenience Goods Floorspace in the Authority Area after Commitments

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2024	21.4	21.5	-0.1	0	0
2029	19.7	21.7	-2.0	-200	-200
2034	20.7	21.9	-1.1	-100	-100
2039	22.9	22.0	0.9	100	100
2040	23.3	22.0	1.3	100	100

Source: Table 6c of Appendix 5

Notes: Assumes constant market share (21.1%) of Study Area expenditure claimed by facilities within Newcastle-under-Lyme authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 4a of Experian Retail Planner Briefing Note 21

6.14 We have also undertaken an assessment of the convenience capacity focusing on Newcastle-under-Lyme town centre specifically. The capacity assessment is based on totalling the benchmark and survey derived turnovers of the convenience facilities within Newcastle-under-Lyme town centre specifically, instead of all of the convenience facilities within the authority area as a whole.

6.15 Table 6.3 below provides the comparable capacity figures for the town centre, once commitments have been taken into account. The Table demonstrates that there is an oversupply of convenience floorspace within Newcastle-under-Lyme town centre across the plan period.

Table 6.3: Quantitative Capacity for Convenience Goods Floorspace in the Town Centre after Commitments

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2024	-0.7	12.7	-13.4	-1,100	-1,200
2029	-1.4	12.8	-14.2	-1,100	-1,200
2034	-1.1	12.9	-14.0	-1,100	-1,200
2039	-0.4	13.0	-13.4	-1,000	-1,100
2040	-0.3	13.0	-13.3	-1,000	-1,100

Source: Table 6c of Appendix 5

Notes: Assumes constant market share (7.0%) of Study Area expenditure claimed by facilities within Newcastle-under-Lyme town centre; allows for changes in benchmark turnover sales efficiency in accordance with Figure 4a of Experian Retail Planner Briefing Note 21

Future Quantitative Comparison Goods Capacity

6.16 For comparison goods, we assume that floorspace is 'in equilibrium' at the start of an assessment (i.e. its turnover is in line with expectations, and that the sector has evolved to meet local/regional needs).

6.17 As identified by the below Table 6.4, our assessment estimates that the comparison goods turnover of the authority area is £247.1m, or £250.3m after account is taken of inflow. Experian anticipates that improvements in the sales efficiency of existing comparison goods floorspace will outstrip per capita comparison goods expenditure growth in the very short term. As such, there is a negative capacity figure of -£0.5m at 2034. This negative capacity remains up until the end of the plan period.

Table 6.4: Quantitative Capacity for Comparison Goods Floorspace in the Newcastle-under-Lyme Authority Area

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Inflow (£m)	Surplus Expenditure (£m)
2024	250.3	247.1	3.2	0.0
2029	283.7	280.0	3.6	0.0
2034	325.7	321.1	4.2	-0.5
2039	374.0	368.7	4.8	-0.5
2040	384.4	379.2	4.9	-0.4

Source: Table 26a of Appendix 5

Notes: Assumes constant market share (14.9%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 4b of Experian Retail Planner Briefing Note 21; in 2022 prices

- 6.18 Once more, we have consulted with the Council and are aware of one comparison commitment within the authority area. This has been applied to the capacity assessment and the turnover grown forward across the plan period using the sales efficiencies provided by Experian in the ERPBN21.
- 6.19 Table 6.5 below indicates that across the plan period, no comparison capacity is identified within the authority area. In particular, at 2034 (ten years ahead) we identify that there is effectively an oversupply of comparison floorspace of between 400 and 700 sq.m.

Table 6.5: Quantitative Capacity for Comparison Goods Floorspace in the Newcastle-under-Lyme Authority Area

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2024	0.0	1.5	-1.5	-300	-400
2029	0.0	1.7	-1.8	-300	-500
2034	-0.5	2.0	-2.5	-400	-700
2039	-0.5	2.3	-2.8	-500	-800
2040	-0.4	2.3	-2.7	-400	-800

Source: Table 26c of Appendix 5

Notes: Assumes constant market share (14.9%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 21; minimum floorspace requirement based on an assumed sales density of £6,000 per sq.m at 2024; maximum floorspace requirement based on an assumed sales density of £3,500 per sq.m at 2024; in 2022 prices

- 6.20 Table 6.6 below then provides the capacity figures for Newcastle-under-Lyme town centre specifically, based on the level of expenditure identified to be attracted to facilities within the town centre. The Table indicates that across the plan period, no comparison capacity is identified within the town centre.
- 6.21 The figures effectively indicate that overall, the level of comparison floorspace within the town centre is of the correct level and therefore there is no requirement to allocate additional sites for comparison floorspace based on the capacity figures.

Table 6.6: Quantitative Capacity for Comparison Goods Floorspace in the Newcastle-under-Lyme Town Centre

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2024	0.0	0.0	0.0	0	0
2029	0.0	0.0	0.0	0	0
2034	-0.2	0.0	-0.2	0	-100
2039	-0.2	0.0	-0.2	0	-100
2040	-0.2	0.0	-0.2	0	0

Source: Table 26c of Appendix 5

Notes: Assumes constant market share (6.0%) of Study Area expenditure claimed by facilities in the town centre; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 21; minimum floorspace requirement based on an assumed sales density of £6,000 per sq.m at 2024; maximum floorspace requirement based on an assumed sales density of £3,500 per sq.m at 2024; in 2022 prices

Convenience and Comparison Qualitative Requirements

- 6.22 We note that most foodstore formats are provided across the authority area with Asda, Sainsbury’s, Morrisons and Tesco all occupying large format stores, and the likes of Co-op, Londis, Sainsbury’s and Tesco trading from smaller local convenience store formats. Whilst there may be opportunity for some such retailers to bring forward additional stores in areas likely to be the subject of significant residential growth, it is in the discount foodstore sector where there is likely to be greatest operator interest.
- 6.23 In this regard, we note that Lidl has interest in opening a store within both the north and south of the authority area, and a requirement to relocate their existing store. Providing for a new foodstore in a sustainable location could assist in ‘levelling out’ some of the identified overtrading and provide for additional consumer choice within the authority area.
- 6.24 Any proposals for additional convenience goods floorspace should be considered on their own merits in accordance with the relevant planning policy tests. Most particularly, planning applications which seek to provide additional food retail provision should be considered having regard to potential sequential alternative sites, and with reference to the magnitude of impacts arising at any defined centre. The potential qualitative benefits associated with any improvement in customer choice can also be afforded weight in the decision-making process.
- 6.25 Turning to the qualitative requirements of comparison retailing, it is clear that Newcastle-under-Lyme town centre does and will continue to be the principal comparison destination across the Study Area. However, beyond Newcastle-under-Lyme, and to a lesser extent Kidsgrove town centre, the principal destinations within the Study Area include the operators at Wolstanton Retail Park and Freeport. Wolstanton Retail Park includes the Asda, B&M Home Store, Dunelm and M&S.
- 6.26 The dominance of large format convenience stores (which sell an element of comparison goods) perhaps indicates that other defined centres are lacking in comparison sales diversity. In this regard, out of centre destinations will continue to have the potential to draw trade from the defined centres, and particularly those which provide for a more diverse comparison offer including selling clothing and footwear.
- 6.27 As such, continuing to encourage comparison retailing into the defined centres and particularly the two key town centres will be key to encouraging footfall and expenditure and policies which seek to protect the defined centres from out of centre development are key to realising this.

7. Assessment of Leisure Capacity

- 7.1 Our approach in considering leisure capacity is in two parts.
- 7.2 For food and beverage floorspace, we adopt a similar approach as to that set out in respect of retail floorspace in the preceding Section 6 of this report. For large format commercial uses, we adopt a ‘benchmarking’ approach where we consider the typical population required to support different types of facilities.
- 7.3 The benchmarking exercise reflects the fact that large format commercial uses are relatively limited in number and residents may be prepared to travel to watch a film or to go ten pin bowling. The current Study Area market share may not be instructive in respect of identifying future large format leisure requirements and therefore our preference is to undertake a benchmarking exercise.

Food and Beverage Requirements

Leisure Expenditure Growth

- 7.4 To calculate per capita food and beverage expenditure, we have again utilised Experian Micromarketer G3 data. The base year for this expenditure data is also 2022. Experian provides separate per capita expenditure estimates on a zonal basis for ‘restaurant and café meals per person’ and ‘alcoholic drinks (away from home) per person’.
- 7.5 There is no need to make allowance for special forms of trading expenditure (given that all food and beverage expenditure identified by Experian relates to eating and drinking in bars, pubs, cafes, and restaurants).
- 7.6 ERPBN21 provides annual leisure expenditure growth forecasts which we set out at the below Table 7.1. These growth rates are used to estimate increases in per capita food and beverage expenditure across the plan period to 2040.

Table 7.1: Experian Retail Planner Briefing Note 20 Leisure Expenditure Annual Per Capita Growth Rates

Year	Leisure Per Capita Annual Growth
2023	-2.6
2024	-2.2
2025	0.4
2026-30	1.3
2030-40	1.6

Source: Figure 1a of Appendix 3 of Experian Retail Planner Briefing Note 21 (February 2024)

- 7.7 We again recognise that growth in expenditure forecasts in the longer-term should be treated with caution given the difficulties in predicting economic performance over such an extensive timeframe.
- 7.8 Accepting this caveat, we are able to use Experian’s recommendations in respect of annual expenditure growth to calculate expenditure across the food and beverage sectors at 2024, 2029, 2034, 2039 and 2040.

Restaurant and Café Floorspace Requirements

- 7.9 Based on the assumed Study Area resident population and the available per capita restaurant and café expenditure, we estimate that £83.0m of such expenditure originates within the Study Area at 2024.

- 7.10 The below Table 7.2 indicates that available Study Area restaurant and café expenditure is forecast to increase to £187.8m at 2041.

Table 7.2: Total Available Study Area Restaurant and Café Expenditure

2024 (£m)	2029 (£m)	2034 (£m)	2039 (£m)	2040 (£m)
414.9	443.0	470.0	495.0	500.1

Source: Table 2 of Appendix 6
Note: In 2022 prices

- 7.11 Table 7.3 indicates that this represents an increase of £85.2m (or 20.5%) across the Study Area between 2024 and 2040.

Table 7.3: Growth in Available Study Area Restaurant and Café Expenditure

Growth 2024-40 (£m)
85.2

Source: Table 2 of Appendix 6
Note: In 2022 prices

- 7.12 Our methodology accounts for the fact that existing operators will look to increase their turnover going forward to remain viable. On this basis, we identify an expenditure surplus of £5.0m at 2029. Due to subsequent expenditure and population increases, this surplus increases to £9.4m at 2034, to £13.5m at 2039 and to £14.2m at 2040.
- 7.13 As with retail capacity, this monetary surplus can be converted into a floorspace requirement. The average sales density of UK floorspace was around £8,584 per sq.m at 2024.²⁰
- 7.14 Based on this sales density (and allowing for future increases in the sales efficiency of leisure floorspace going forward), we estimate that 600 sq.m of additional café and restaurant floorspace could be supported at 2029, increasing to 1,700 sq.m at 2040.

Table 7.4: Quantitative Capacity for Restaurant and Café Floorspace in the Authority Area

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq.m)
2024	83.0	83.0	0.0	0.0	0.0
2029	83.6	88.6	0.0	5.0	600
2034	84.7	94.0	0.0	9.4	1,100
2039	85.5	99.0	0.0	13.5	1,600
2040	85.9	100.0	0.0	14.2	1,700

Source: Table 5a and Table 5b of Appendix 6

Notes: Assumes constant market share (20.0%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 21 - Leisure; in 2022 prices

- 7.15 Similarly to the convenience and comparison capacity assessment above, we have also undertaken a capacity assessment for Newcastle-under-Lyme town centre specifically. We present these figures below in Table 7.5. Table 7.5 indicates that the capacity for additional restaurant and café floorspace within the town centre specifically is identified to be 400 sq.m at 2029, rising to 1,200 sq.m at 2040.

²⁰ As identified by Figure 2 of Experian Retail Planner Briefing Note 20 – Leisure.

Table 7.5: Quantitative Capacity for Restaurant and Café Floorspace in the Town Centre

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq.m)
2024	57.8	57.8	0.0	0.0	0.0
2029	58.2	61.7	0.0	3.5	400
2034	58.9	65.5	0.0	6.5	800
2039	59.5	68.9	0.0	9.4	1,100
2040	59.8	69.6	0.0	9.9	1,200

Source: Table 5a and Table 5b of Appendix 6

Notes: Assumes constant market share (13..9%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 21 - Leisure; in 2022 prices

Licensed Premises Floorspace Requirements

7.16 Based on the assumed Study Area resident population and the available per capita alcoholic drinks expenditure, we estimate that £173.9m of alcoholic beverage expenditure originates within the Study Area at 2024. The below Table 7.6 indicates that available Study Area restaurant and café expenditure is forecast to increase to £209.5m at 2040.

Table 7.6: Total Available Study Area Licensed Premises Expenditure

2024 (£m)	2029 (£m)	2034 (£m)	2039 (£m)	2040 (£m)
173.9	185.7	197.0	207.4	209.5

Source: Table 7 of Appendix 6

Note: In 2022 prices

7.17 Table 7.7 indicates that this represents an increase of £35.7m (or 20.5%) across the Study Area between 2024 and 2040.

Table 7.7: Growth in Available Study Area Licensed Premises Expenditure

Growth 2024-40 (£m)
35.7

Source: Table 7 of Appendix 6

Note: In 2022 prices

7.18 Our complete licensed premises quantitative assessment model is provided at Appendix 6 of this Study. Table 9 of Appendix 6 identifies that £63.6m (equating to 36.6%) of Study Area alcoholic drink expenditure is directed to licensed premises in the authority area at 2024.

7.19 Our methodology accounts for the fact that existing operators will look to increase their turnover going forward to remain viable. On this basis, we identify an expenditure surplus of £3.9m at 2029. Due to subsequent expenditure and population increases, the identified surplus increases to £7.2m at 2034, to £10.3m at 2039 and to £10.9m at 2040.

7.20 Once again, this monetary surplus can be converted into a floorspace requirement. Based on the average UK leisure sales density of £8,584 sq.m at 2024 (and allowing for future increases in the sales efficiency of leisure floorspace going forward), we estimate that 500 sq.m of additional licensed premises floorspace could be supported at 2029, increasing to 1,300 sq.m at 2040.

Table 7.8: Quantitative Capacity for Licensed Premises in the Authority Area

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq.m)
2024	63.6	63.6	0.0	0.0	0.0
2029	64.0	67.9	0.0	3.9	500
2034	64.9	72.1	0.0	7.2	900
2039	65.5	75.9	0.0	10.3	1,200
2040	65.8	76.6	0.0	10.9	1,300

Source: Table 5a and Table 5b of Appendix 6

Notes: Assumes constant market share (36.6%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 21 - Leisure; in 2022 prices

7.21 Similarly to the convenience and comparison capacity assessment above, we have also undertaken a capacity assessment for Newcastle-under-Lyme town centre specifically. We present these figures below in Table 7.9.

7.22 Table 7.9 indicates that the capacity for additional restaurant and café floorspace within the town centre specifically is identified to be 200 sq.m at 2029, rising to 700 sq.m at 2040.

Table 7.9: Quantitative Capacity for Licensed Premises in the Town Centre

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq.m)
2024	32.9	32.9	0.0	0.0	0.0
2029	33.2	35.2	0.0	2.0	200
2034	33.6	37.3	0.0	3.7	400
2039	33.9	39.3	0.0	5.4	600
2040	34.1	39.7	0.0	5.6	700

Source: Table 5a and Table 5b of Appendix 6

Notes: Assumes constant market share (18.9%) of Study Area expenditure claimed by facilities in the town centre; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 21 - Leisure; in 2022 prices

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

7.23 Our approach in identifying the potential for large format to the assessment of commercial leisure needs necessarily departs from the above monetary capacity assessment. This is because the commercial leisure sector is different to the retail and food and beverage sectors; 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.

7.24 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.

7.25 We firstly calculate the expected Study Area and local authority populations for the relevant reporting years.

7.26 We then calculate the number of persons required to support a bingo hall, casino, cinema screen and bowling alley 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 2019), which identifies that there are 350 bingo halls and 145 casinos across the UK;
- the UK Cinema Association website²¹ which identifies that there are 4,637 cinema screens across the UK; and estimated population growth; and
- Mintel’s Ten Pin Bowling UK report (May 2017), which identifies that there are 5,242 bowling lanes across the UK.

7.27 We then apply the respective ratio to the Study Area population and to the population of the Newcastle-under-Lyme authority area to gauge the benchmark level of provision, based on the position evident across the UK.

7.28 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) to help identify any qualitative deficiencies in provision.

7.29 We recognise that some of these facilities are not as important as they perhaps once were in underpinning the local leisure economy. However, all four uses generally occupy large format premises and, as such, if a requirement were to be identified then there are potential land use implications.

Bingo

7.30 Mintel’s March 2019 Casinos and Bingo UK report identifies that there are 350 bingo halls across the UK, which equates to a bingo hall for every 195,377, persons or thereabouts.²² Accordingly, we estimate that the authority area could theoretically support around 0.6 bingo hall at 2024, increasing very slightly to 0.7 bingo halls at 2040.

7.31 The below Table 7.10 confirms bingo hall capacity within Newcastle-under-Lyme over the period to 2040.

Table 7.10: Bingo Hall Capacity in the Authority Area

Year	Study Area Population	Typical Population Required to Support Hall	Potential Number of Halls Supported in the Study Area	Potential Number of Halls Supported in the Authority Area	Outstanding Potential Capacity in the Authority Area
2024	125,828	195,377	0.6	0	0.6
2029	128,394	195,377	0.7	0	0.7
2034	130,639	195,377	0.7	0	0.7
2039	132,527	195,377	0.7	0	0.7
2040	132,900	195,377	0.7	0	0.7

Note: Typical population to support bingo hall calculated with reference to the Mintel Casinos and Bingo UK 2019 report and to the ONS 2023 population forecasts for the UK

7.32 The bingo sector has been significantly affected by the ban on smoking in enclosed workplaces which came into force in 2007 following the enactment of the Health Act 2006. Subsequent to the Act being enforced, new bingo hall openings have been rare, and we consider it highly unlikely that there will be any proposals to provide additional facilities in the authority area in the foreseeable future. The provision available in adjacent authority areas will be sufficient to meet resident’s needs.

²¹ www.cinemauk.org.uk, consulted on 15 September 2023.

²² Based on 2020-Based Population Projections by the Office for National Statistics which identify a UK population of 67,844,000 persons at 2023.

Cinemas

- 7.33 The UK Cinema Association website estimates that there are 4,637 cinema screens in the UK²³, which equates to one screen for every 14,801 persons or thereabouts. On this basis, we estimate that the Study Area population could support around 13.1 cinema screens at 2023, increasing to around 14.3 screens at 2041.
- 7.34 There is one cinema within the authority area, being the Vue cinema at The Square within the town centre. Further provision is also available within the neighbouring Stoke authority area.
- 7.35 As Table 7.11 indicates below, the provision within Newcastle-under-Lyme is broadly consistent with the identified capacity. Furthermore, residents have good access to additional provision within neighbouring authority areas. Trips to such cinemas are therefore considered to be generally reflective of sustainable travel patterns and many Study Area residents' relative proximity to existing cinemas.

Table 7.11: Cinema Screen Requirement in Newcastle-under-Lyme

Year	Study Area Population	Typical Population Required to Support Cinema Screen	Potential Number of Cinema Screens Supported by Study Area	Potential Number of Cinema Screens Supported in the Authority Area	Outstanding Potential Capacity in the Authority Area
2024	125,828	14,801	8.5	8	0.5
2029	128,394	14,801	8.7	8	0.7
2034	130,639	14,801	8.8	8	0.8
2039	132,527	14,801	9.0	8	1.0
2040	132,900	14,801	9.0	8	1.0

Note: Typical population to support a cinema screen calculated with reference to data provided by the UK Cinema Association website and to the ONS 2023 population forecasts for the UK

Ten Pin Bowling

- 7.36 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 13,045 persons or thereabouts.
- 7.37 In this context, there is a formal ten pin bowling facility within the authority area, located at the Lymelight Boulevard. The Lymelight Lanes provides a total of five lanes. As Table 7.12 below indicates, the authority area population could potentially support up to 10 lanes across the plan period, indicating a potential capacity for an additional facility.
- 7.38 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. However, the upturn in the sector has been driven by smaller facilities which are generally supplemented by a strong food and beverage offer and are located within larger urban centres. We do not envisage that there will be a strong demand for additional facilities, and again, the amenities in adjacent authority areas will be meeting some of the residents' demands.

²³ At 2022.

Table 7.12: Ten Pin Bowling Lane Requirement in the Authority Area

Year	Study Area Population	Typical Population Required to Support Bowling Lane	Potential Number of Bowling Lanes Supported by Study Area	Potential Number of Bowling Lanes Supported in the Authority Area	Outstanding Potential Capacity in the Authority Area
2024	125,828	13,045	9.6	5	4.6
2029	128,394	13,045	9.8	5	4.8
2034	130,639	13,045	10.0	5	5.0
2039	132,527	13,045	10.2	5	5.2
2040	132,900	13,045	10.2	5	5.2

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 2023 population forecasts for the UK

Casinos

7.39 Mintel’s Casinos and Bingo UK 2018 report identifies that there are 145 casinos across the UK, which equates to a casino for every 471,600 persons or thereabouts. Accordingly, we estimate that the authority area could support around 0.3 casinos at 2024, a figure which would barely change throughout the Study period.

7.40 In this context, we note that there are currently two casinos within the authority area, which exceeds the identified capacity.

Table 7.13: Casino Requirement in the Authority Area

Year	Study Area Population	Typical Population Required to Support a Casino	Potential Number of Casinos Supported by Study Area	Potential Number of Casinos Supported in the O&W Authority Area	Outstanding Potential Capacity in the O&W Authority Area
2024	125,828	471,600	0.3	2	-1.7
2029	128,394	471,600	0.3	2	-1.7
2034	130,639	471,600	0.3	2	-1.7
2039	132,527	471,600	0.3	2	-1.7
2040	132,900	471,600	0.3	2	-1.7

Note: Typical population to support casino calculated with reference to the Mintel Casinos and Bingo UK 2018 report and to the ONS 2023 population forecasts for the UK, England and Wales, Scotland and Northern Ireland

8. Summary, Conclusions and Policy Recommendations

Context

- 8.1 The principal purpose of the Study is to understand future retail and leisure needs, and to provide policy recommendations to assist the Council in its preparation of the forthcoming Local Plan.
- 8.2 The Local Plan will set out the Council’s strategy in respect of delivering new future growth in respect of a range of new developments, including housing, jobs, and main town centre uses. To ensure that commercial uses are delivered in sustainable locations, the Local Plan will provide up to date policies in respect of town centre boundaries, the hierarchy of defined centres, and local impact thresholds of relevance to retail and leisure developments.
- 8.3 This concluding section of our report summarises the key findings of the Study and addresses planning policy requirements of relevance to retail, leisure, and town centres.

Key Findings: Retail

Quantitative and Qualitative Capacity

- 8.4 As identified at Section 7, we do not identify any surplus capacity which could support additional convenience and comparison goods floorspace within the short or longer-term.
- 8.5 Over the plan period, we identify that there is a nominal convenience goods floorspace requirement of 100 sq.m, and an oversupply of comparison goods of between 400 and 800 sq.m.

Table 8.1: Quantitative Capacity for Convenience Goods and Comparison Goods Floorspace in the Newcastle-under-Lyme Authority Area

Year	Convenience Goods Floorspace Requirement		Comparison Goods Floorspace Requirement	
	Minimum (sq.m)	Maximum (sq.m)	Minimum (sq.m)	Maximum (sq.m)
2024	0	0	-300	-400
2029	-200	-200	-300	-500
2034	-100	-100	-400	-700
2039	100	100	-500	-800
2040	100	100	-400	-800

Source: Table 6d and 26d of Appendix 5

Note: In 2022 prices

- 8.6 We also provide below the capacity figures for Newcastle-under-Lyme town centre specifically. As noted above, there is no identified capacity for additional convenience or comparison floorspace within Newcastle-under-Lyme town centre across the plan period.

Table 8.2: Quantitative Capacity for Convenience Goods and Comparison Goods Floorspace in the Newcastle-under-Lyme Town Centre

Year	Convenience Goods Floorspace Requirement		Comparison Goods Floorspace Requirement	
	Minimum (sq.m)	Maximum (sq.m)	Minimum (sq.m)	Maximum (sq.m)
2024	-1,100	-1,200	0	0
2029	-1,100	-1,200	0	0
2034	-1,100	-1,200	0	-100
2039	-1,000	-1,100	0	-100
2040	-1,000	-1,100	0	0

Source: Table 6d and 26d of Appendix 5

Note: In 2022 prices

- 8.7 Clearly, the first priority will be to encourage the reuse, refurbishment or redevelopment of vacant floorspace within defined centres. Given the lack of the identified convenience or comparison goods requirement, we do not believe there to be any need to allocate additional sites for either convenience or comparison goods retail development over the plan period.

Key Findings: Commercial Leisure

- 8.8 Our assessment of future leisure needs is in two parts.
- 8.9 In terms of food and beverage floorspace, we have undertaken a quantitative assessment which identifies available expenditure and takes account of the need for existing businesses to increase their turnover to remain viable. Our assessment has identified that at 2040 there is a requirement for 1,700 sq.m of restaurant and café floorspace and for 1,300 sq.m of licensed premises floorspace (this equating to a total of 3,000 sq.m of food and beverage floorspace).
- 8.10 We anticipate that this floorspace will comprise of relatively small-scale cafés, restaurants and bars which would generally be accommodated within the principal centres. Once again, the quantum of floorspace identified is less than the total quantum of vacant floorspace identified across the principal centres (even when the food and beverage floorspace requirement is considered alongside the comparison goods floorspace requirement identified at Section 6). Accordingly, we recommend that this floorspace requirement is directed towards Newcastle-under-Lyme's defined centres in order to secure the re-use and repurposing of vacant floorspace.

Table 8.3: Quantitative Capacity for Restaurant and Café Floorspace and Licensed Premises Floorspace in the Authority Area

Year	Restaurant and Café Floorspace Requirement (sq.m)	Licensed Premises Floorspace Requirement (sq.m)	Total Food and Beverage Floorspace Requirement (sq.m)
2024	0	0	0
2029	600	500	1,100
2034	1,100	900	2,000
2039	1,600	1,200	2,800
2040	1,700	1,300	3,000

Source: Tables 5a, 5b, 10a and 10b of Appendix 6

Note: Assumes constant market share of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 21 - Leisure; in 2022 prices

8.11 Table 8.4 below also provides the comparable quantitative capacity figures focussing specifically on Newcastle-under-Lyme town centre. In this regard, our assessment has identified that at 2040 there is a requirement for 1,200 sq.m of restaurant and café floorspace and for 700 sq.m of licensed premises floorspace (this equating to a total of 1,900 sq.m of food and beverage floorspace).

Table 8.4: Quantitative Capacity for Restaurant and Café Floorspace and Licensed Premises Floorspace in Newcastle-under-Lyme Town Centre

Year	Restaurant and Café Floorspace Requirement (sq.m)	Licensed Premises Floorspace Requirement (sq.m)	Total Food and Beverage Floorspace Requirement (sq.m)
2024	0	0	0
2029	400	200	600
2034	800	400	1,200
2039	1,100	600	1,700
2040	1,200	700	1,900

Source: Tables 5a, 5b, 10a and 10b of Appendix 6

Note: Assumes constant market share of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 21 - Leisure; in 2022 prices

8.12 We have undertaken a quantitative benchmarking exercise to identify general requirements in respect of large format leisure uses.

8.13 This has identified quantitative capacity which equates to a requirement across the authority area at 2040 for:

- 0.7 bingo halls;
- 1.0 cinema screen;
- 5.2 ten pin bowling lanes; and
- -1.7 casinos.

8.14 The cinema screen and ten pin bowling lane requirements are of a modest scale. In practice, the neighbouring authority areas act as a focus for larger format leisure uses.

8.15 We do not anticipate there to be operator demand to bring forward larger format leisure uses in the authority area over the plan period to 2040.

Key Findings: Principal Centres

8.16 The Study has reviewed the vitality and viability of defined town and district service centres across the Borough. Our assessments have been undertaken with reference to the town centre healthcheck indicators set out at paragraph 006 of the Town Centres PPG.

8.17 We set out the overarching conclusions in respect of Newcastle-under-Lyme and Kidsgrove town centres below.

8.18 **Newcastle-under-Lyme's** daytime economy is underpinned by its varied retail and service offer, with its edge-of-centre convenience anchors providing key support by attracting trade and footfall via linked trips. The centre serves a diverse catchment, including residents of the surrounding suburbs and students of the nearby Keele University (some of whom reside in accommodation located within the town centre boundary).

8.19 We note that the vacancy rates in the town centre have increased since the time of the previous survey, both in terms of floorspace (the proportion of which has risen from 13.3% to 15.8%) and units (18.1% of the centre's

commercial premises were unoccupied in 2018, compared to 22.8% in 2024). Newcastle-under-Lyme's vacancy rates are therefore above the national averages of 14.0% of floorspace and 14.0% of units. The Roebuck Shopping Centre appears to have been particularly hard hit by the broad trends in the non-food retail sector, having lost a number of national multiple comparison operators in recent years (including Argos, Next and Bonmarche). The Shopping Centre is currently largely empty, although it has had some success in diversifying its offer with the support of the Newcastle-under-Lyme BID, including the opening of the Foundry Gym and other new businesses including a café.²⁴ Other vacant units are dispersed throughout the town centre and generally well-maintained, which reduces their detrimental impact on the quality of the centre environment.

- 8.20 It is important to note that the town centre's retail offer remains reasonably strong and is sufficient to meet the majority of the day-to-day needs of its users, but the recorded decline in comparison shopping provision over the past few years and the accompanying rises in vacancy rates reinforce the importance of planned investments and efforts to diversify the centre offer. These interventions will be key to ensuring the resilience of Newcastle-under-Lyme and securing its wider regeneration.
- 8.21 **Kidsgrove** town centre benefits from a reasonable range of retail, leisure, and financial and business service operators for a centre of its size, which is considered adequate to meet most of the day-to-day needs of the walk-in catchment. However, the service offer does lack diversity, with over 80% of the retail service traders being health & beauty operator and with the financial and business services offer being entirely composed of estate agents (following the closure of the centre's Barclays bank in 2023). Leisure provision is below UK averages in terms of floorspace and units and we consider that the town centre's evening economy is limited, particularly outside of the Market Street area where there is a concentration of takeaways.
- 8.22 The number of vacant premises in Kidsgrove has doubled from five (6.4% of the units in the centre) to ten (12.3%) since the time of the August 2018 survey undertaken for the 2019 Retail Study. The town centre's proportion of vacant floorspace has risen even more significantly, from 363 sq.m (3.6% of the total) in 2018 to 1,119 sq.m (11.0%) in 2024. At the time of the most recent survey, the unoccupied premises were concentrated around the junction of Heathcote Street and Liverpool Road. In general, this part of the centre is quieter and appears to benefit less from the footfall generated by Home Bargains on Market Street. While the recorded rises are concerning, it is important to note that these have taken place in the context of a challenging UK market impacted by factors such as the Covid-19 pandemic. Nationally, the floorspace vacancy rate has risen from 9.3% in March 2018 to 14.0% in March 2024, while the unit vacancy rate has risen over the same period from 11.2% to 14.0%. Kidsgrove's own proportions of unoccupied floorspace and units continue to fall below these national averages.
- 8.23 Moreover, as detailed in the full healthcheck set out in Appendix 3, Kidsgrove is set to benefit from £16.9m of Town Deal funding and a £600k grant from the UK Shared Prosperity Fund for strategic developments and projects, including a refurbishment to Kidsgrove Rail Station and a new Shared Services Hub in the town centre. This investment, together with the other initiatives explained in the full healthcheck, has the potential to significantly benefit the town centre through increased connectivity and footfall.
- 8.24 Overall, Kidsgrove functions reasonably well as a retail and service centre catering for a good number of the day-to-day needs of its residential catchment.

²⁴ See: <https://www.stokesentinel.co.uk/news/stoke-on-trent-news/five-new-stores-cafe-set-8245538> [accessed 20th May 2024]

Future Retail and Centres Strategy

Mix of Uses

8.25 We provide an overview of the mix of uses evident within centres below at Table 8.5. The authority’s two town centres are generally multi-functional, focused on day-to-day retail and service needs.

Table 8.5: Mix of Uses Across Authority’s Centres

Land Use	Units (%)		Floorspace (%)	
	Newcastle	Kidsgrove	Newcastle	Kidsgrove
Comparison	20.2%	18.5%	20.8%	34.8%
Convenience	10.1%	12.3%	21.6%	10.6%
Financial and Business	6.2%	3.7%	6.1%	1.8%
Leisure Service	26.1%	19.8%	26.8%	16.8%
Retail Service	14.5%	33.3%	9.0%	25.0%
Vacant	22.8%	12.3%	15.8%	11.0%
Total	100.0%	100.0%	100.0	100.0%

Note: Composition of centres derived from Nexus Planning survey of 2023

- 8.26 It will be important to ensure that any further development is appropriately located in respect of the needs that it would serve and in respect of ensuring that no defined centre is the subject of a ‘significant adverse’ impact as a result of new entrants into the grocery market in particular.
- 8.27 The provision of main food shopping destinations within and around defined centres is a key strength of centres across the authority area and the benefit of retaining this should be given substantial weight when considering future convenience goods retail proposals.
- 8.28 In terms of service sectors, financial and business transactions have increasingly moved online and ‘bricks and mortar’ financial service provision has significantly reduced as a consequence. This trend will not be reversed. It will be important to ensure that premises previously put to such use are repurposed and brought back into active use. By way of example, former bank and building society premises can often be made into attractive bars and restaurants which are able to enhance a centre’s wider offer (including the evening economy).
- 8.29 Whilst the economic picture is currently challenging for hospitality operators, we consider that further potential exists to expand the leisure sector offer within the authority’s principal centres across the medium to longer term and the assessment undertaken to support this Study confirms that there is a capacity for additional food and beverage floorspace across the authority area and within Newcastle-under-Lyme town centre specifically.
- 8.30 It is highly unlikely that there will be substantial comparison goods retail development coming forward within the local authority areas across the plan period. In practice, some such in-centre retailers may close. This could open up town centre space for convenience retailers, and for the growth of the leisure and retail service sectors.
- 8.31 In particular, food and drink operators are a critical component of a modern town centre, and the future success of these operators is inextricably linked to centres’ overall vitality. Improved local leisure provision will mean a reduced need to travel further afield to eat, drink and socialise. This reduces carbon emissions and accords with sustainable development principles (particularly as a rounded retail and service offer should encourage linked trips and reduce travel).

Meeting Retail Needs

- 8.32 The retail capacity assessment has not identified any quantitative capacity for either convenience or comparison floorspace within the authority area across the plan period. As such, we do not recommend that the Council allocates any sites within the defined centres to accommodate additional floorspace within the local plan.
- 8.33 In particular, we do not anticipate a need to build out any further comparison goods floorspace over the plan period and recommend that any planning applications which support such a use are carefully considered in respect of their compliance with the sequential and impact town centre policy tests. In terms of convenience floorspace, as identified above,

Meeting Commercial Leisure Needs

- 8.34 As Section 7 demonstrates, we do not identify any capacity for large format leisure floorspace within the authority area. We do however, identify a floorspace capacity for restaurants, cafes and other licenced premises but this is not at a level which we consider should be reflected in policy.
- 8.35 In this regard, the quantum of floorspace identified is less than the total quantum of vacant floorspace identified across the authority area's principal centres. Accordingly, we recommend that this floorspace requirement is directed towards the defined centres in order to secure the re-use and repurposing of vacant floorspace.
- 8.36 Commercial leisure continues to be an important element of the overarching offer of centres and is one of the key attractors which draws in footfall both during the daytime and evening.
- 8.37 Therefore, a recognition that such uses play an important role in helping to support the future vitality and viability of centres should be included in planning policy.

Planning Policy Recommendations

General Policy Approach

- 8.38 The adopted and emerging local plan promotes a 'town centre first' policy approach which is broadly consistent with the general requirements of paragraphs 90 to 95 of the NPPF.
- 8.39 This Study identifies that the proportion of vacant floorspace in Newcastle-under-Lyme town centre is above national average level, equating to 22.8% of commercial units. As such, there will be a benefit in reducing the level of vacancies to improve centres' offer and visual attractiveness, and to support additional activity. Accordingly, it will be important to try to direct additional development within centres (or, failing that, in sustainable locations which are able to support linked trips to defined town centres).
- 8.40 In this regard, we note that paragraph 018 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 by development. Paragraph 018 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.'**
- 8.41 In this context, it will be important for the emerging plan to clearly set out the importance of the sequential and impact tests and explain the local circumstances which frame how they will be applied in practice. The sequential

and impact tests will need to be applied in a robust manner in order to provide for the re-use of vacant units and to support centres which retain a strong retail function as well as a diverse range of other uses. Whilst non-retail uses will be an important component of the mix of land uses in principal centres moving forward, there is still a requirement to accommodate new retailers and secure additional retail floorspace within defined centres wherever possible in accordance with the requirements of the NPPF.

- 8.42 It will be important for the forthcoming plan to clearly identify that all three centres should remain a focus for both convenience and comparison goods retail and that such uses remain important in driving footfall. Whilst the role of the principal centres is impacted by the character of large scale retail provision at larger centres outside of the authority area (including Hanley) and out of centre provision, each has been able to continue to support a significant quantum of comparison goods retailers (generally focused around day-to-day household comparison goods shopping and independent retailers). It is important that this offer is maintained.
- 8.43 Notwithstanding this, it is evident that fundamental changes in the retail sector – largely resulting from the shift to online retail, which has been accelerated by the Covid-19 pandemic – have had a permanent impact on land use on the high street. As such it is critical that defined centres continue to diversify in order to provide access to jobs, leisure, culture, services, and social connection.
- 8.44 In the context of the current vacancy rate and national planning policy requirements, we recommend that emerging plan policies are sufficiently flexible so as to allow for an appropriate range of town centre uses beyond retail, and reflect the need to repurpose historic, sometimes outdated retail stock in order to accommodate new residential, leisure and community uses. To this end, we note that paragraph 90 of the NPPF states that planning policies should:

‘...recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.’

- 8.45 The emerging plan should also consider the effects of the expanded Use Class E and the consequences of the additional flexibility which Class E provides for outside of town centres. The authorities may wish to consider applying restrictive conditions to planning permission for Class E development which is delivered outside of town centres to restrict the authorised use to that which has been justified in the application submission. This will help ensure that unacceptable impacts do not arise within town centre as a consequence of future Class E development.

Boundaries

- 8.46 Paragraph 90 of the NPPF requires local plans to **‘define the extent of town centres and primary shopping areas’**.
- 8.47 National planning policy no longer explicitly prescribes the designation of primary and secondary frontages. The Government has confirmed that the removal of this requirement reflects the general need to be flexible in planning for the future of town centres due to the rapid changes taking place in the retail and leisure industries. Whilst the removal of the requirement does not preclude local planning authorities from identifying primary and secondary shopping frontages where supported by local circumstances, we do not believe that this is merited in this instance. There is a clear need to repurpose and reoccupy centres across both authority areas in the manner that Use Class E generally provides for. In this context, the separate designation of both primary and secondary frontages would serve no useful purpose. Instead, where appropriate, we recommend a single defined ‘primary shopping area’.

8.48 Annex 2 of the NPPF indicates that a primary shopping area is the ‘Defined area where retail development is concentrated’.

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

8.50 Annex 2 further defines main town centres uses as:

‘Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).’

8.51 In this context, it is important to note that, although there is the opportunity to define separate primary shopping area and town centre boundaries, there is no general requirement to do so unless the specific characteristics of the subject centre support such an approach. Government policy specifically encourages the diversification of centres. Whilst retail will (in most cases) be a key element of a town centre, the majority of lower-order centres are diverse and uses are typically distributed throughout the centre. Such centres may not have a particular concentration of retail uses at their core.

8.52 Furthermore, it is also important to recognise the purpose of defining both a primary shopping area and town centre boundary. In planning policy terms, distinguishing between the primary shopping area and town centre boundary is of principal merit in terms of identifying the area of relevance in applying the sequential and impact tests to retail development. The particular relevance of the primary shopping area to retail planning proposals is confirmed by Annex 2 of the NPPF.

8.53 We have reviewed the current boundaries of the three principal centres and provide our commentary on a centre-by-centre basis at Table 8.6 below. As identified above, we believe that any existing primary and secondary frontages should not be maintained going forward given the provisions of Class E of the Use Classes Order and the Government’s general objective that there should be greater flexibility on the high street.

Table 8.6: Summary of Boundary Recommendations for Defined Town Centres

Centre	Recommendations	Summary
Newcastle-under-Lyme	<p>The town centre boundary in the adopted development plan is extensive and contains many non-town centre uses. The proposed boundary represents a substantial reduction that reflects the adopted Primary Shopping Area.</p> <p>Although the large-footprint supermarkets surrounding the proposed boundary play a key role in supporting the town centre by generating some trade and footfall via linked trips, the ring road is considered to form a significant barrier to connectivity and thus we continue to recommend that these stores be defined as ‘edge-of-centre’ in policy terms.</p>	<p>We do not recommend that a primary shopping area is defined within Newcastle, and that the town centre boundary is retracted to only include main town centre uses.</p>

Centre	Recommendations	Summary
	The recommendation for a primary shopping area/frontages has been removed to reflect the changes to the GDPO that have occurred since the 2019 Study.	
Kidsgrove	<p>As in 2019, we recommend the inclusion of the four commercial units on Liverpool Road to the immediate west of the adopted town centre boundary.</p> <p>We also continue to recommend the exclusion of large areas of dwellings and non-town centre uses to the north of the Kings Street Parade and the Home Bargains store on Market Street.</p> <p>We also continue to recommend the exclusion of the dwellings at 106 to 116 Liverpool Road to the east of the centre.</p>	<p>We recommend the overarching retraction of the town centre boundary to the north and the extension of the boundary to the west.</p> <p>We do not recommend the designation of a separate primary shopping area.</p>

8.54 We have also undertaken a review of the draft boundaries for the remainder of the hierarchy of centres within the Emerging Local Plan, and provide our recommendations in respect of the boundaries at Appendix 7.

Hierarchy

8.55 Paragraph 90 of the NPPF identifies that local planning authorities should define a network and hierarchy of town centres. However, very little detail is provided in this regard and, notably, neither the NPPF nor the Town Centres PPG differentiates between different types of town centre and the role each serves. The most recent definitions provided by the Government were provided by Planning Policy Statement 4: Planning for Sustainable Economic Growth ('PPS4'), which was published in December 2009 (and was superseded by publication of the original iteration of the NPPF in March 2012). Whilst PPS4 should be considered on this basis (i.e. it is not up to date practice guidance), in the absence of any other definitions it is of some relevance to the consideration of a retail centres hierarchy.

8.56 Annex B of PPS4 identified that:

'City centres are the highest level of centre identified in development plans. In terms of hierarchies, they will often be a regional centre and will serve a wide catchment. The centre may be very large, embracing a wide range of activities and may be distinguished by areas which may perform different main functions. Planning for the future of such areas can be achieved successfully through the use of area action plans, with masterplans or development briefs for particular sites. In London the 'international' and 'metropolitan' centres identified in the Mayor's Spatial Development Strategy typically perform the role of city centres.

Town centres will usually be the second level of centres after city centres and, in many cases, they will be the principal centre or centres in a local authority's area. In rural areas they are likely to be market towns and other centres of similar size and role which function as important service centres, providing a range of facilities and services for extensive rural catchment areas. In planning the future of town centres, local planning authorities should consider the function of different parts of the centre and how these contribute to its overall vitality and viability. In London the 'major' and many of the 'district' centres identified in the Mayor's Spatial Development Strategy typically perform the role of town centres.

District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.

Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre.

Small parades of shops of purely neighbourhood significance are not regarded as centres for the purposes of this policy statement.'

- 8.57 Draft Local Plan Policy RET 1: Retail provides the draft retail hierarchy for the Borough. The draft policy provides three tiers (Strategic Centre, Urban Centre and Rural Centre) and then within those three tiers, sets out a series of sub-tiers, labelled as 'centre name' within Table 2.
- 8.58 Whilst we are of the view that the general hierarchy of centres is appropriate, we do consider that the setting of tiers and sub-tiers is over-complicating the application of the tests.
- 8.59 As Section 4 of this report demonstrates, Newcastle-under-Lyme is by some distance the largest centre in the Borough with its 143 commercial units supporting a total of 89,740 sq.m of commercial floorspace. The centre has a rounded offer that incorporates significant grocery provision, significant retail and leisure service provision, and community facilities. The retail and leisure offer is considerably more than Kidsgrove town centre, and we therefore agree that Newcastle-under-Lyme is clearly the principal centre within the authority area.
- 8.60 We have reviewed the size, offer and overarching nature of the Borough's district and local centres, and have sought to define them accordingly based on the definitions as provided above. In this regard, we have removed the 'rural' and 'urban' definitions, and considered the general catchments the centres serve. In particular, we have combined the larger 'rural centres' within the 'district centres' to make one single tier, and specifically defined Baldwin's Gate, Loggerheads and Madeley as local centres.
- 8.61 We are aware that Newcastle-under-Lyme's neighbourhood centres are materially smaller in scale. We have reviewed the extent of each and note that they generally provide a single figure number of commercial units which serve a localised catchment. Many customers will travel on foot to these centres, which are focused around top up food shopping and localised services.
- 8.62 Importantly, we have also removed Parksite (Bath Road) Neighbourhood Centre from the list of parades within the hierarchy as it is now fully vacant, and subject to a live planning permission for residential development (reference 24/00101/FUL). We also note that the Council has referred to Keele University Hub within the hierarchy. Whilst we recognise the importance of providing commercial uses to the students at Keele, there is no specific agglomeration of commercial uses which we consider could comprise a neighbourhood parade. As such, we recommend that the Council makes reference to the importance of supporting local retail and other main town centre uses to meet local needs of residents.
- 8.63 We have therefore provided our recommended hierarchy in Table 8.7 below and the boundaries of the centres at Appendix 7.

Table 8.7: Confirmation of Hierarchy in Newcastle-under-Lyme

Tier	Centre(s)
Strategic Town Centre	Newcastle-under-Lyme Town Centre
Town Centre	Kidsgrove Town Centre
District Centres	Audley, Chesterton, Silverdale High Street, Wolstanton High Street
Local Centres	Baldwin's Gate, Loggerheads, Madeley

Tier	Centre(s)
Neighbourhood Parades	<ol style="list-style-type: none"> 1. Bradwell (Hanbridge Avenue) Neighbourhood Centre 2. Butt Lane (Congleton Road) Neighbourhood Centre 3. Chesterton (Barbridge Road) Neighbourhood Centre 4. Clayton (Cambridge Drive) Neighbourhood Centre 5. Clayton (Clayton Road, opposite Abbot's Way) Neighbourhood Centre 6. Cross Heath (Liverpool Road) Neighbourhood Centre 7. Kidsgrove, Whitehill Road Neighbourhood Centre 8. Knutton (Knutton Lane) Neighbourhood Centre 9. May Bank (High Street) Neighbourhood Centre 10. Liverpool Road Neighbourhood Centre 11. Newcastle Town (George Street, Eastern End) Neighbourhood Centre 12. Porthill (Watlands View) Neighbourhood Centre 13. Rookery (High Street) Neighbourhood Centre 14. Seabridge (Tyne Way) Neighbourhood Centre 15. Talke (High Street) Neighbourhood Centre 16. Thistleberry (Paris Avenue) Neighbourhood Centre 17. Thistleberry/Town (Higherland/Drayton Street) Neighbourhood Centre 18. Westlands (Windermere Road) Neighbourhood Centre 19. Westbury Park (Westbury Road) Neighbourhood Centre

Thresholds

8.64 Paragraph 90 of the NPPF indicates that it is appropriate to identify thresholds for the scale of edge of centre and out of centre retail and leisure developments which should be the subject of impact assessment. Any such threshold policy applies to the impact test only (all planning applications for main town centre uses which are not in an existing centre and not in accordance with an up-to-date development plan should be the subject of the sequential test²⁵).

8.65 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 authority area. In 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.

8.66 Paragraph 015 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
- 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.'

²⁵ With the exception (in accordance with paragraph 89 of the NPPF) of small scale rural office proposals and other small scale rural development.

- 8.67 Using the above guidance, we set out below the justification to support our view that a lower threshold should be applied across the hierarchy of centres within the authority areas.
- 8.68 In considering the setting of a local impact threshold, it is relevant 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 help act to 'anchor' a centre. Should one of these anchor units or operators leave a centre, it is more likely that there will be the potential for a significant adverse impact to arise.
- 8.69 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.
- 8.70 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.
- 8.71 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.
- 8.72 In Newcastle-under-Lyme town centre, 11.4% of all units have a gross floorspace which is greater than 500 sq.m. The vacancy rate equates to 15.8% of total commercial floorspace and 22.8% of all units. In total, convenience and comparison goods uses account for 37,990 sq.m of floorspace, or 42.3%.
- 8.73 In Kidsgrove town centre, around 4.3% of units have a gross floorspace which is greater than 500 sq.m or 300 sq.m and 13.0% have a gross floorspace which is greater than 200 sq.m. The vacancy rate equates to 11.0% of total commercial floorspace and 12.3% of all units. In total, convenience and comparison goods uses account for 4,608 sq.m of floorspace or 45.4% of the total commercial floorspace. It is clear therefore, that although Kidsgrove town centre is performing relatively well, the centre is comprised of predominantly smaller units.
- 8.74 We recommend that a 500 sq.m impact threshold should effectively act as default to be applied authority-wide, should a proposal not be subject to a lesser threshold of relevance to smaller centres.
- 8.75 Both Kidsgrove town centre and the district centres support a relatively small number of anchor tenants and have a limited convenience goods turnover. As such, we believe that a convenience store in proximity to Kidsgrove and the district centres could have the potential to materially impact on convenience goods operators within the centre. As such, we recommend a reduced impact threshold of 200 sq.m in respect of district centres.
- 8.76 Local centres are often underpinned by small format grocery stores (effectively little more than a 'corner shop' in terms of their format). In most cases, these operators underpin the function of local 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. The loss of an occupier of such importance could have a significant adverse impact on the centre as a whole.
- 8.77 Given the character of such operations and their importance to local centres, we recommend that an impact threshold of 200 sq.m is applicable to retail and leisure proposals in proximity to local centres.

- 8.78 We believe that the proposed lower thresholds for local service centres and lower-order centres in the hierarchy is appropriate as a consequence of their localised role and function, and the fact that the opening of a small format convenience store outside of these smaller centres is likely to directly compete with type of local needs provision typically found within such centres. We therefore believe it is reasonable for applicants proposing developments of 200 sq.m gross floorspace for local service centres and below, to demonstrate that their proposal will not have a significant adverse impact on smaller centres sharing part of the same catchment.
- 8.79 Where an application proposal is above the respective stated impact threshold, we would recommend that the applicant discusses and agrees the scope of the retail impact assessment with the Council prior to submission. The lower threshold of 200 sq.m for the smallest defined centres is considered appropriate due to potential for convenience stores of even a relatively small nature to substantially impact upon the performance of existing operators, due to the potential higher sales densities of such proposals. This would ensure that particular protection of these smaller centres is considered appropriately.
- 8.80 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 lower impact thresholds of 200 sq.m and 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 being concentrated on one centre when the development is more distant.
- 8.81 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 Officers during the pre-application process in order to avoid overly onerous requirements that may otherwise restrict and delay development opportunities from coming forward.
- 8.82 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 Kidsgrove town centre, a district centre or a local centre and is in excess of 200 sq.m gross.
- 8.83 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 95 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.
- 8.84 In terms of the practical application of the impact policy threshold, the primary shopping area (where defined) comprises the relevant boundary in respect of retail proposals and the wider centre boundary is the relevant boundary in respect of leisure applications.

Policy Recommendations Summary

8.85 In order to assist the Council in finalising the draft policy position, we have set out below a summary of our policy recommendations against the relevant adopted local planning policy. In doing so, we provide commentary where we consider amendments should be made to policy to reflect the findings of this Study.

Table 8.8: Policy Recommendations Summary Table

Policy RET 1 Criteria	Current Policy Wording	Nexus Recommendations	Relevant Paragraph References in Study
Part 1	In order to protect, promote and retain the long-term vitality and viability of retail centres in the Borough, the following retail hierarchy of centres should be followed	<p>We provide our recommended centre hierarchy as part of the analysis above, seeking to make the policy clearer and enabling the Council to better apply the retail policy tests.</p> <p>Overall, we recommend a five-tiered approach to include:</p> <ol style="list-style-type: none"> 1. Strategic town centre 2. Town centre 3. District centres 4. Local centres 5. Neighbourhood parades 	Table 8.7
Part 2	Development proposals should reflect the role, function, and character of each centre in the retail hierarchy.	<p>We do not recommend any changes to Part 2 of the draft policy. Overall, we have recommended that Newcastle-under-Lyme town centre continues to be the principal focus for larger format retailing and the delivery of additional leisure uses and to a lesser extent Kidsgrove town centre. Recognising the importance of Newcastle as the principal centre within the Borough is important in helping to provide for the needs of residents within the Borough.</p>	8.16-8.31
Part 3	Town Centre and Primary Shopping Area boundaries for the Strategic Centre and Urban Centre are shown on the Policies Map.	Our recommended town centre boundaries are provided at Appendix 7.	Table 8.6
Part 4	Development proposals for use class E (a) retail development or investment to enhance existing use class E(a) retail provision will be supported within the Primary Shopping Area and Rural, District and Neighbourhood Centres.	We agree with the overarching aim of Part 4 to direct retail uses to defined centres in the first instance. However, we consider the policy should be expanded to also include reference to wider main town centre uses, looking beyond just retail development for the defined centres.	

Policy RET 1 Criteria	Current Policy Wording	Nexus Recommendations	Relevant Paragraph References in Study
		Overall, Part 4 will need to reflect the NPPF policy wording which seeks to encourage and promote the long-term vitality and viability of centres through growth and diversification (paragraph 90) and the sequential and impact guidance which seeks to direct all main town centre uses to defined centres (paragraphs 91 and 94).	
Part 5	Development proposals for main town centre uses outside of defined centres should satisfy the requirements of the sequential test as set out in national planning policy.	We agree that the policy needs to specifically refer to the sequential approach. As the wording refers to the national guidance, we do not recommend any changes.	8.41
Parts 6 and 7	<p>Development proposals for retail and leisure uses that are located on the edge or outside of a defined centre, are not in accordance with an up to date plan and exceed the floorspace thresholds set out below, will have to demonstrate that they would not have a significant adverse impact in the terms set out in the National Planning Policy Framework where:-</p> <ul style="list-style-type: none"> • The proposal provides a gross floorspace in excess of 500 sqm gross: or • The proposal is located within 800 meters of the boundary of a district, rural or neighbourhood centre and is in excess of 200 sqm gross. <p>Retail convenience and comparison floorspace needed arising in the Borough over the Plan period will be met primarily through further retail development focused on sites in the Strategic and Urban Town Centre boundaries.</p>	<p>We provide our full details in respect of the local impact thresholds above. In short, we recommend that the following thresholds should apply for all retail and leisure development:</p> <ul style="list-style-type: none"> • the proposal provides a gross floorspace in excess of 500 sq.m gross; or • the proposal is located within 800 metres of Kidsgrove town centre, a district centre or a local centre and is in excess of 200 sq.m gross. 	8.81

Appendix 1 – Study Area

Appendix 2 - Household Survey Results

Appendix 3 – Town Centre Healthchecks

Appendix 4 – District, Local and Neighbourhood Centre Healthchecks

Appendix 5 – Quantitative Retail Tables

Appendix 6 – Quantitative Leisure Tables

Appendix 7 – Proposed Boundaries

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