

City of Bradford District Council

Retail and Leisure Study

Volume 1 Main Report

Final Draft Report

October 2019

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1.0 Introduction

1.1 Instruction

- 1.1.1 The City of Bradford Metropolitan District Council ('the Council') started the process of undertaking a Retail and Leisure Study for the City of Bradford District ('Bradford District') in January 2019.
- 1.1.2 The Council's previous evidence base in respect of retail and leisure needs was provided by the Bradford Retail and Leisure Study Update published in May 2013 ('the 2013 Study'), produced by WYG Planning (hereafter referred to as 'WYG'). The 2013 Study was informed by a household survey conducted in October 2012. A further study of Bradford Local Centres Update, also produced by WYG, was published in March 2017. The future capacity estimates set out in the 2013 Study as well as the recommendations on the definition and hierarchy of centres in both the 2013 Study and the 2017 Bradford Local Centres Update informed the Bradford Core Strategy Development Plan Document (DPD) adopted in 2017, which provides strategic policies to guide development within Bradford District until 2030.
- 1.1.3 The composition of Bradford City Centre has undergone substantial change in recent years, most notably following the opening of the Broadway Shopping Centre in 2015, along with other developments in and surrounding the defined centres within Bradford District. Given the length of time since the publication of the 2013 Study and the significant changes to the retail and leisure landscape over this period, it was considered appropriate to undertake an entirely new study for Bradford District informed by a new household shopping survey.
- 1.1.4 This Study will assist in informing a partial review of the Bradford Core Strategy DPD and the development of the emerging Site Allocations DPD, which will allocate sites for development or protection. Furthermore, the Study will assist the Council and other stakeholders in delivering the local level policies as set out in the adopted Core Strategy, the Bradford City Centre Area Action Plan, and the Shipley and Canal Road Corridor Area Action Plan.
- 1.1.5 The principal objectives to be addressed by the Study are:
- To undertake a review of the relevant retail and leisure policies within the adopted Local Plan documents in the context of the NPPF and NPPG;
 - To undertake vitality and viability assessments of Bradford District's town centres, comprising Bradford City Centre, Ilkley Town Centre, Bingley Town Centre, Keighley

Town Centre and Shipley Town Centre, and the District and Local Centres, including an assessment of the existing markets;

- To assess the quantitative and qualitative need and capacity for additional retail floorspace and leisure uses in Bradford District; and
- To provide recommendations on policies, strategies and proposals for the emerging Local Plan Allocations DPD and the partial review of the Core Strategy DPD including:
 - The need to designate any new centres in areas of significant housing growth;
 - The definition of town centre boundaries (including primary shopping areas and primary and secondary shopping frontages);
 - Advise on the role and appropriate mix of uses in town centres;
 - Criteria that could be used to facilitate growth, management and adaptation of the district's town centres while safeguarding their expected role and ensuring increased competitiveness and customer choice.
 - The identification of an appropriate range of sites capable of accommodating any future retail and leisure needs; and
 - Any other wider town centre planning policy recommendations.

1.1.6 In order to address the above requirements, the Study draws on new empirical research, with NEMS Market Research Limited ('NEMS') undertaking a survey of 1,800 households within the defined Study Area in March and April 2019. The Study Area for the household survey comprises 18 zones which are based on postcode sectors grouped together to reflect areas which are likely to exhibit similar patterns of shopping behaviour. The Study Area and zones correspond with those defined in the 2013 Study, enabling comparison of shopping patterns identified from the previous household survey in 2012 with the 2019 findings.

1.1.7 In addition to the household survey, this study is informed by on-street surveys in Bradford City Centre undertaken by The Retail Group and Fieldwork Assistance in June 2017 on behalf of the Council, and in Keighley, Bingley, Ilkley and Shipley Town Centres by NEMS in May and June 2019. The on-street surveys are aimed at obtaining a further understanding of residents and visitors' views and behaviour in relation to specific centres.

1.1.8 This Study also draws on the most recent Experian population and expenditure data (published in December 2018) to establish the most up-to-date position with regards to both convenience and comparison goods capacity.

1.1.9 As previously, the Council has also utilised the services of WYG, particularly in undertaking the Health Check of the retail centres and using their models to help forecast retail needs, capacity and expenditure as well as drawing up appropriate and informed recommendations for policy matters and site allocations.

1.2 Structure of Study and Report

1.2.1 The overall study comprises two volumes as follows:

- Volume 1 provides the main report
- Volume 2 covers the health check assessments of the defined centres comprising Bradford City Centre, the four town centres, seven district centres and 46 local centres, as well as the performance assessments of the markets.

1.2.2 This main report comprising Volume 1 of the Study is structured as follows:

- Section 2 provides a context for the study through the analysis of key retail and leisure trends;
- Section 3 considers local and national planning policy of relevance to retail and town centre matters;
- Section 4 summarises the findings and conclusions of the vitality and viability assessments of Bradford City Centre, and the district's defined town, district and local centres;
- Section 5 provides an analysis of residents' shopping patterns as identified from the household survey undertaken by NEMS Market Research in March and April 2019;
- Section 6 identifies current and future population and expenditure levels within the defined Study Area;
- Section 7 provides assessment of the future quantitative and qualitative need for further convenience and comparison goods retail floorspace;
- Section 8 considers the need for additional commercial leisure development;
- Section 9 sets out key conclusions and provides recommendations in respect of Bradford District's future retail and leisure strategy.

2.0 National Retail and Leisure Trends

2.1 Introduction

- 2.1.1 The retail property landscape across the UK has evolved significantly over the past 50 years, from post-war redevelopment in town centres, through to the emergence of supermarkets, retail warehouse parks and out-of-town regional shopping malls. For most of this period, the retail sector has benefitted from considerable expenditure growth, which has been attributed to a number of factors, including greater disposable income, availability of credit, new technology and a general overall increase in our standard of living.
- 2.1.2 Per capita convenience goods spending has actually reduced in recent years, whilst comparison goods spending growth is now far slower than has historically been the case. The way in which goods are purchased has also altered due to the increased popularity of 'e-tailing', which now claims more than one in every ten pounds spent in the UK.
- 2.1.3 However, economic conditions since the post Global Financial Crisis period of 2008/09, which saw the failure of Woolworths, Stead and Simpson and Zavvi amongst others, have had a clear impact on the retailer and leisure sector. Over the last five years, changing consumer trends, higher inflation, lower consumer spend and higher costs for retailers have continued to increase the pressure on retail business models. Retail is an industry which is under pressure with many retailers finding themselves in an uncomfortable position as margins are squeezed between weakening demand and rising costs.
- 2.1.4 Colliers¹ report that 2018 was a particularly challenging year for retailers, with the retail sector experiencing the most challenging environment since the post Global Financial Crisis period and a raft of CVAs and administrations. This led to Toys R Us, Maplin and Poundworld going into administration, and House of Fraser, New Look, Carpetright and Prezzo seeking a Company Voluntary Agreement, amongst others. High number of retail and leisure operator failures have persisted in 2019, with Debenhams, Patisserie Valerie, and Bathstore all going into administration.
- 2.1.5 Whilst the recent reduction in inflation and increase in real wages mean that pressure on consumers is easing and spending should increase, there remains considerable uncertainty surrounding Brexit. At the time of writing the final outcome of the Brexit negotiations remain

¹ National Retail Barometer 2018 report.

uncertain. If an exit arrangement is finally approved by Members of Parliament, and subsequently accepted by the EU, plans will be in place to proceed with the terms of a final trade deal including a two-year transition period. However, if a deal cannot be reached and further extensions are agreed to the Brexit process the UK will continue to face uncertainty which will continue to impact consumer spending and investment decisions. The remaining part of 2019 and 2020 will be an uncertain period for the UK consumer. It is difficult to predict what will happen given that so much depends on the nature of the UK's exit from the EU.

- 2.1.6 In order to set out the wider context for the TCHR, we provide an overview of prevailing retail and leisure trends below.

2.2 Polarisation and the Decline of Secondary Centres

- 2.2.1 In recent years, shoppers have been increasingly prepared to travel in order to access a greater choice of shops and the type of leisure facilities which are more commonly available in larger towns and cities. As a consequence, larger retail venues (with a regional or sub-regional role) have tended to perform relatively strongly, but a number of other secondary destinations (particularly those proximate to larger centres) have fared less well. The performance of many secondary destinations has also been particularly impacted upon by the recession and the growth of internet shopping. Many operators have consolidated their store estate in the face of declining sales alongside rising overheads, such as rising minimum wages and business rates, which have hit profits. Believing that they can still achieve appropriate nationwide coverage with a lesser number of stores, secondary destinations are typically the focus for store closures.
- 2.2.2 The 2019 Midsummer Retail Report confirms that because of continuing high-profile company administrations a series of vacant units is apparent throughout the North with some leaving significant gaps. However, Colliers see signs of hope in fashion brands new to the region (from Europe and the South East, such as Monki and Weekday) beginning to show interest. In relation to more localised retailing, Colliers point to the continuing growth of the Co-op in the convenience sector. Colliers also advocate a role for local authorities showing flexibility in uses both in and out of centres. They advise that the restaurant market can no longer be seen as a saviour by occupying vacant retail units.
- 2.2.3 The situation has been exacerbated by Company Voluntary Arrangements ('CVA') including New Look. The Centre for Retail Research ('CRR') issued a list in October 2018 of *'Who's*

Gone Bust in Retailing 2010-18²?, which details UK retailers who went into receivership between 2005 and 2018, based on research carried out at that time.

- 2.2.4 The CRR has analysed the main retail failures in the period since the recession. There are 32, with 12,770 stores affected and 175,714 employees. They range from Blacks Leisure in 2008 to BHS in 2016, Store Twenty-One and Palmer and Harvey in 2017 and Toys 'R'Us, House of Fraser, Maplin and Poundworld in 2018. Woolworths was the biggest casualty in this period with 820 stores and 30,000 staff, BHS was the second largest in terms of stores, and House of Fraser the second largest in terms of staff. These figures are based on the CRR's own research over this period.
- 2.2.5 In November 2017, high-street retailer Marks and Spencer ('M&S') set out a five-year transformation programme for the business, involving a slowdown in the Simply Food store opening programme and an acceleration of the UK store estate closure programme, after better than expected levels of sales transfer from closures, and plans to grow online sales. In May 2018, M&S announced further store closures³, followed by more recent announcements of additional closures in January 2019⁴. M&S propose to close over 100 stores in total by 2022.
- 2.2.6 In October 2018, Debenhams confirmed the proposed closure of up to 50 of its 165 stores over the next three to five years. Alongside these high-profile high-street closures, it is also evident that certain operators – including the Arcadia Group, through its Outfit format which incorporates Topshop, Topman, Miss Selfridge and others – remain prepared to close stores in smaller centres in favour of representation (via relocation) on an out-of-centre retail park. Also notable is the increasing preference of fast food operators to incorporate 'drive thru' restaurants, which has resulted in the closure of 'in centre' McDonald's and KFC restaurants in some centres.
- 2.2.7 The loss of these various (often sizable) high-street units – once operated by national brands – has resulted in a significant oversupply of retail floorspace in some town centres which already have very limited demand. The issue is of greatest significance in secondary locations, where vacancy rates have increased more noticeably. For example, Colliers

² <http://www.retailresearch.org/whosegonebust.php>. The Centre for Retail Research includes the following legal notice: '*this listing of UK retailers who went into receivership between 2005 and 2018 is based on research carried out at the time and our understanding of their business affairs then. Some of these companies recovered and came out of administration; some were bought by other businesses; some were sold as going concerns but changed their name; for some, the name was bought, and this is still used, but under different ownership; and others ceased to exist. The presence of any business in this historical listing must not be taken to imply that it no longer exists, its name is not used or that such business, if still trading, is impaired in anyway.*'

³ <https://corporate.marksandspencer.com/media/press-releases/2018/m-and-s-uk-store-estate-update>

⁴ <https://www.bbc.co.uk/news/business-46876749>

Midsummer Report (2018) found that outside of London, the success rate in terms of take-up of previously used retail floorspace is generally poor, and just over a third of the stock had found a new use.

- 2.2.8 The selective nature of retailer demand has fuelled the polarised retail environment, with many operators now focusing on key high-footfall locations. The impact of these changes on individual centres is varied with some towns performing better than others. Research into town centre retail performance over the last decade completed by Cushman & Wakefield in 2018⁵ identifies that the 'winning' locations tend to be the largest retail centres, such as cities or attractive cathedral towns. These locations typically benefit from low levels of comparison floorspace provision relative to their population leading to higher sales densities, and higher tourist and leisure spend.
- 2.2.9 Nevertheless, town centre resilience is more closely correlated with affluence than catchment size. Those towns with the least resilience typically suffer from weak income profiles and low wage growth that curtail spending, along with higher rates of crime and a significant oversupply of comparison retail and leisure floorspace. This is evident across West Yorkshire although there are examples of towns which buck this trend.
- 2.2.10 Such changes can result in particularly significant impacts on smaller and the least resilient town centres, which have tended to be the subject of higher vacancy rates, and which have also often suffered related reductions in commercial rental values and footfall in recent years. A reduction in commercial rents demonstrates a lack of demand for properties and poor take-up rates, along with high yields. Whilst low rental levels are often seen as a negative, as they indicate a lack of demand from major retailers, there are benefits to independents and local operators seeking cheap accommodation (even rent-free in some circumstances). In any event, as a consequence, a greater proportion of comparison goods expenditure is being claimed by a smaller number of 'winning' destinations, typically cities of regional or sub-regional importance.
- 2.2.11 Moreover, such changes have brought forward opportunities for different types of retailer. Some available units in secondary centres have been re-occupied by household discounters such as B&M Bargains, Poundland, Poundstretcher and Wilkinson. Whilst such lettings are valuable in bringing back premises into active use, many secondary centres are heavily reliant on such retailers, which are generally operated at the 'discount' end of the retail market. UK high-streets witnessed the loss of Poundworld in 2018, with 335 shops closing in

⁵ UK High Streets: Dead or Alive? Cushman & Wakefield, April 2018

August. This demonstrates perhaps that these 'bargain' focussed, low-average value item retailers are not as popular as they once were. Rising wage costs, business rates, and declining footfall, along with a vast change in the way we shop, all assisted in the demise of the retailer.

- 2.2.12 It is also evident that some secondary town centres are seeking to 'reinvent' themselves through an increased focus on quality independent and food and drink operators although the evidence suggests that this is not the panacea once imagined. Town centres are also increasingly valuing their market as a means to differentiate themselves from retail parks and superstores, and many markets are looking to contemporary and speciality retailers to create interest and draw customers in. However, the greatest opportunities for successful vintage, craft and food and drink markets have so far been in centres served by affluent catchments.

2.3 The End of the 'Big Four Space Race' and the Rise of the Discounter

- 2.3.1 Shoppers have turned away from food superstores in recent years and Mintel suggests that this decline is such that it cannot be considered a 'blip'. Mintel attributes the problems which face superstores to two principal factors.

- Firstly, many young people are choosing to rent within or close to town and city centres. As a consequence, many undertake sporadic food shopping and often eat out, use takeaways, or buy instant meals. Accordingly, when young people undertake food shopping, they often have no greater need than that which can be serviced by a convenience store.
- The second factor is the growth of discount operators, which have become more mainstream in respect of both their offer and their market positioning. Mintel suggests that the improvements in discounters' offer – such as wider ranges, better fresh foods and more premium foods – means that they have become an attractive alternative to both large food superstores and to convenience stores.

Table 2.1: Market Share of Key UK Food Retailers

Operator	2012	2013	2014	2015	2016	2017	2018
Tesco	23.9%	23.0%	23.3%	22.8%	22.6%	22.1%	22.0%
Sainsbury's	13.1%	12.9%	13.1%	12.8%	12.6%	12.2%	12.1%
Asda	13.3%	13.0%	13.0%	12.0%	11.3%	11.4%	11.3%
Morrison's	9.3%	8.9%	9.2%	8.6%	8.6%	8.3%	8.4%
Aldi	2.6%	3.3%	4.3%	4.8%	5.5%	6.0%	6.6%
Co-operative Food	5.4%	5.1%	5.2%	5.1%	4.9%	4.7%	4.7%
Waitrose	3.6%	3.7%	3.8%	4.0%	3.9%	3.9%	3.9%
Marks & Spencer	3.7%	3.7%	3.9%	4.0%	4.1%	4.1%	4.1%
Lidl	2.0%	2.0%	2.2%	2.5%	3.2%	3.2%	3.3%
Iceland	1.9%	1.9%	2.0%	2.0%	2.0%	2.0%	2.2%

Source: UK Food & Grocery Retailer Update, GlobalData.com

2.3.2 As a consequence, the 'big four' foodstore operators (Asda, Morrisons, Sainsbury's and Tesco) have become circumspect in respect of new store openings. The very large stores to which all had previously aspired are no longer part of business planning with subdivisions being investigated and, indeed, they have closed a number of existing stores. All four have suffered declines in their market share over the past four or five years. As Table 2.1 above indicates, Tesco has suffered a 1.9 percentage point reduction in its share of the food retail market between 2012 and 2018, and Morrisons has suffered a 0.9 percentage point reduction in market share. Considered together, the market share of the 'big four' foodstore operators has declined from 59.6% in 2012 to 53.8% in 2018 (a reduction of 5.8 percentage points). In contrast, other retailers – most notably Aldi and Lidl – have benefitted from increases in their market share. Aldi's market share increased from 2.6% to 6.6% (an increase of 4 percentage points) between 2012 and 2018.

2.3.3 For the most part, the current strategy of the 'big four' operators involves the reconfiguration and refurbishment of existing stores. In some cases, product lines are being reduced and pricing is being made straightforward. Some operators are looking to introduce other uses to take existing floorspace and Sainsbury's acquisition of the Home Retail Group in September 2016 allows it to introduce Argos (which it now owns) into its stores. Small concessions of Habitat are also currently being tested within branches of Sainsbury's and uses such as hairdressers, key cutting and shoe repairs, and photo processing are all taking concession spaces in larger Tesco and Morrison superstores.

2.3.4 Aldi and Lidl have both taken advantage of the structural changes in the food retail market and have announced ambitious store opening targets that will further increase pressure on the 'big four' operators. Both have become less specific but Aldi aims to increase from nearly

800 stores to 1,000 by 2022 and Lidl, with about 740 seeing scope for 1,200 to 1,500 “in the long term” (Fresh Produce Journal March 2018).

- 2.3.5 In April 2018, a proposed merger between Asda and Sainsbury’s was announced, which had the potential to be one of the most significant structural changes affecting large format food retailing in recent times. However, the merger was considered by the Competition and Markets Authority (‘CMA’), and a report published in April 2019 confirmed that the CMA found that UK shoppers and motorists would be worse off if the merger took place, due to expected price rises, reductions in the quality and range of products available, or a poorer overall shopping experience. The watchdog added that the deal would have resulted in a “substantial lessening of competition” at both a national and local level and that shoppers right across the UK would be affected – not just in the areas where Sainsbury’s and Asda stores overlapped. This final decision to block the deal follows the CMA’s provisional findings and a subsequent consultation period, during which the CMA reviewed responses from a variety of interested parties, including Sainsbury’s.

2.4 Special Forms of Trading

- 2.4.1 Many consumers who previously shopped in town centres and at retail parks are now increasingly using the internet to make purchases. Experian⁶ identifies that ‘internet sales’ now comprises an estimated 18.9% of total UK retail sales (2018), which compares to a market share of just below 5% in 2008. Experian estimates that the total value of ‘non-store sales’ (which includes mail order and market sales alongside the internet) in the UK at 2018 was £79.2 billion (in 2015 prices). It estimates that special forms of trading will increase further to account for 22.6% of retail expenditure at 2022. Thereafter, it is anticipated that additional growth will be at a slower rate, with special forms of trading claiming 25.6% of UK retail expenditure at 2030 and 26.7% at 2037 (the last reporting year for which Experian provides a figure).
- 2.4.2 The growth in internet as a sales medium has been enabled by the increase in access to the internet by UK households, which the Office for National Statistics⁷ reports increased from 57% of households at 2006 to 90% in 2018. The proportion of households with access to the internet is expected to increase further over the coming years and the popularity of shopping online is also assisted by mobile phones and tablets with faster 4G network technology. The Office for National Statistics indicates that the proportion of adults accessing

⁶ ‘Experian Retail Planner Briefing Note 16’, December 2018

⁷ ‘Statistical Bulletin: Internet Access Households and Individuals’, Office for National Statistics, August 2018

the internet using a mobile phone more than doubled – from 36% to 78% – between 2011 and 2018.

- 2.4.3 It is evident that improvements in technology and an increased confidence in the security of online payments have supported substantial increases in internet sales in recent years. In addition, the option of using the internet to 'click and collect' in-store at a dedicated counter is also increasing in popularity⁸. Some retailers are also seeing benefits arising from the use of shops as 'showrooms' where shoppers can view and try goods before making purchases later in their home. More progressive retailers are also providing in-store Wi-Fi (which can be used to inform shoppers of promotions via their mobile phones) and technology points (which can allow shoppers to browse a wider product range than that carried in store). Accordingly, whilst new technology and the rise of internet shopping undoubtedly provides challenges for traditional 'bricks and mortar' retailers, it also brings with it some opportunities.
- 2.4.4 Global Data's report Click & Collect in the UK, 2017-2022, indicates that despite rapid growth anticipated over the next five years, click & collect sales will be impacted as retailers continue to close unprofitable stores as physical locations struggle against the online channel, reducing the number of click & collect locations. In addition to this, more retailers are investing in delivery saver schemes following the success of Amazon Prime and ASOS Premier, encouraging shoppers to subscribe and save on delivery costs. As this is a primary driver of click & collect, this will also hinder sales via the channel.
- 2.4.5 Charlotte Pearce, Retail Analyst at GlobalData, comments⁹: "Click & collect sales will become increasingly threatened as delivery saver schemes become more widely available and retailers continue to extend their choice of fulfilment options. Retailers must ensure that their click & collect propositions are competitive in terms of price and/or threshold as well as speed of delivery into stores. This will help to drive footfall into stores and encourage additional spend at the retailer."
- 2.4.6 In addition, it is important to note that many purchases made online are actually sourced from the shelves of 'bricks and mortar' stores and thereby have the potential to support retail floorspace. This is acknowledged by Experian which now provides adjusted market share figures for special forms of trading¹⁰ in order to reflect purchases which are affected through stores.

⁸ 'Click and Collect', Mintel, September 2014

⁹ <https://www.globaldata.com/uk-click-collect-sales-set-soar-55-6-2022/>

¹⁰ 'Experian Retail Planner Briefing Note 16', December 2018

2.4.7 The adjusted allowance for special forms of trading equates to 3.7% for convenience goods at 2018¹¹, increasing to 4.4% at 2021, to 5.2% at 2026, to 5.6% at 2031, and to 5.8% at 2035. For comparison goods, the adjusted allowance is 17.0% at 2018¹², increasing to 19.2% at 2021, to 20.9% at 2026, to 21.5% at 2031, and to 21.7% at 2035. The adjustment is greater for convenience goods, reflecting the fact that most on-line food purchases are taken from the shelves of actual stores.

Figure 2.2: Convenience Non-Store Retail Sales (Experian, December 2018)

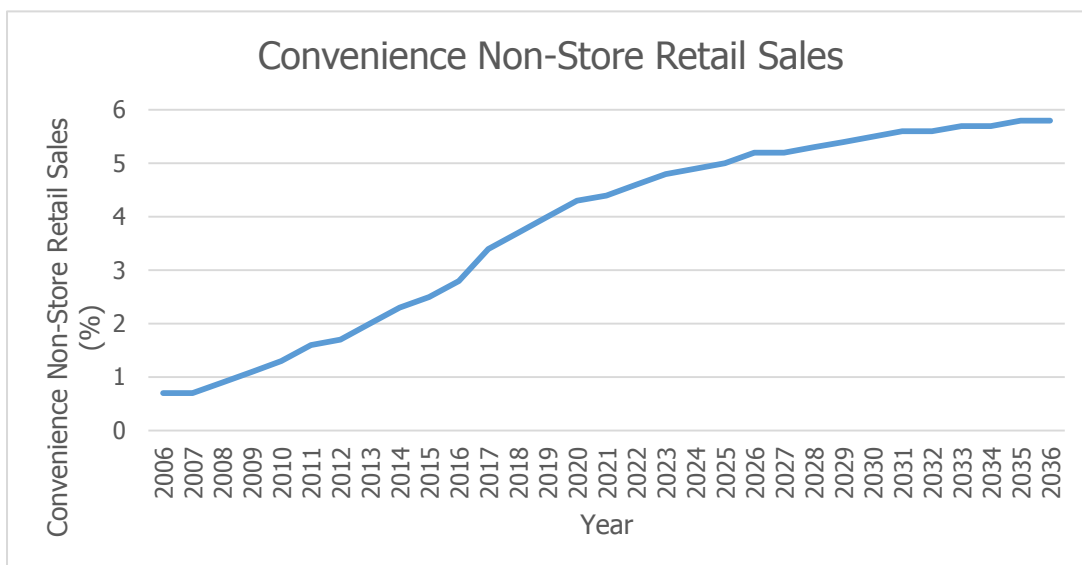
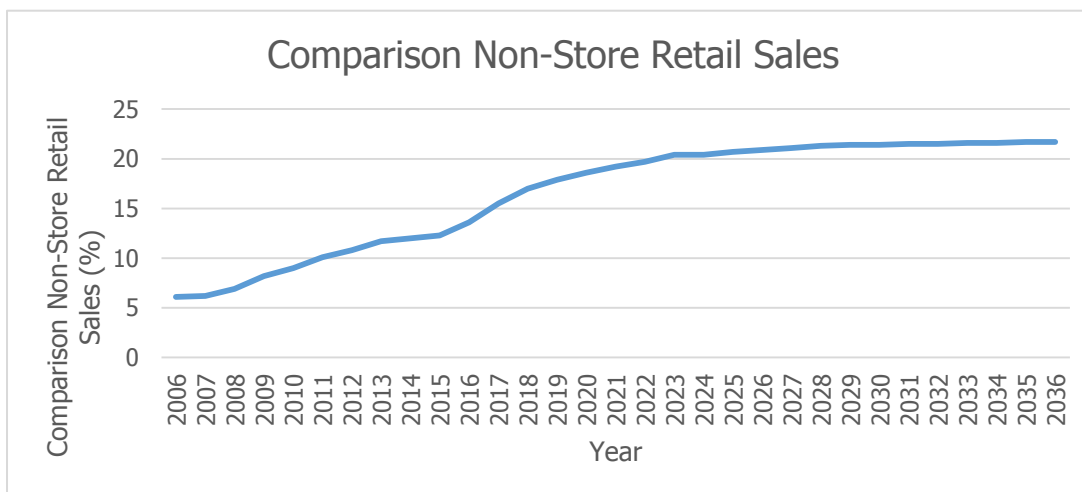


Figure 2.3: Comparison Non-Store Retail Sales (Experian, December 2018)



¹¹ Adjusted down from 12.4% (or by 8.7%) to account for goods sourced from the shelves of physical retail stores.

¹² Adjusted down from 22.6% (or by 5.6%) to account for goods sourced from the shelves of physical retail stores.

- 2.4.8 Figure 2.2 and 2.3 above present visually the change in national non-store retail sales for both convenience and comparison goods since 2006, and the predicted change up until 2036.
- 2.4.9 Notwithstanding the loss of expenditure witnessed to the internet in particular over the past decade or so, there remain opportunities for the high streets related to the provision of 'click and collect' facilities. NEMS reports (October 2018) that there is an opportunity to enhance the collection experience and therefore to promote impulse and complimentary purchases. From national research conducted by NEMS, it is reported that just under one third of online shoppers are venturing into physical stores to collect the products purchased – creating an opportunity for spin-off trade for retailers.

2.5 Leisure and the Appetite for Additional Food and Drink

- 2.5.1 People now eat out more often and for a wider range of occasions. PWC reports that the fundamental structural shift driven by demographic and consumer trends, has led to considerable market growth in the restaurant sector in recent years and underpinned significant transactional activity, particularly between 2015 and 2017. PWC also reports on the increasing crossover between market segments with the food-to-go sector growing and being available all day, while dine-in chains are offering take away options including enhanced technology to encourage the use of services such as Deliveroo and Uber Eats¹³. However, in recent months, key national brands have announced their downsizing and even the closure of restaurants, including Prezzo and Jamie Olivers'. The market view, as expressed by Colliers above, is that restaurants cannot be relied upon to save the High Streets.
- 2.5.2 Those restaurant operators still seeking to expand their portfolio increasingly require units which are in amongst the retail heart of the town centres - rather than taking space within a food court. As a consequence, modern shopping mall developments now tend to mix food operators within the wider offer and upwards of a quarter of units can be occupied by cafes and restaurants. Food and drink operators (particularly national multiples) can be particularly attractive to landlords, as long leases can often be agreed due to the high cost of quality fit-outs.
- 2.5.3 The casual dining sector is experiencing a fall in like-for-like sales growth. The Guardian reports that the number of UK restaurants going insolvent increased by a fifth in 2017

¹³ <https://www.pwc.co.uk/services/business-recovery/insights/restructuring-trends/restaurants-2017-food-for-thought.html>

compared with 2016¹⁴. According to law firm Moore Stephens, this was a consequence of certain chains coming under pressure from rising labour costs, higher business rates, increasing food costs (exacerbated by a weaker pound following the EU referendum) and competition, amid a squeeze on consumer spending.

- 2.5.4 This has continued through 2018 with the sector, having experienced a five-year boom, turned to decline, particularly on the High Street. The same factors listed above are highlighted as key factors in this change.
- 2.5.5 In terms of other leisure activities, Colliers¹⁵ reports that cinema openings are on the up and that niche cinema operators, such as Everyman, Curzon and The Light, are considered to have the potential to be particularly complementary to shopping environments. Such cinemas have more modest land take requirements than large multiplexes, and therefore may have a greater chance of being incorporated in a mixed-use development.
- 2.5.6 The health and fitness sector has been buoyed by the popularity of budget gyms. Operators such as Pure Gym, the Gym Group, and easyGym have an operational model which is based on low costs and high volume. Such gyms tend to have plenty of equipment in order to encourage use, but are characterised by basic fit-outs and limited staff. Many budget gym operators – including Pure Gym and the Gym Group – are actively seeking to bring forward additional facilities, with a wide range of properties (including old theatres, larger shop units and office space) having the potential to meet their needs. The Gym Group and PwC¹⁶ reported in spring 2019 that there are around 650 budget gyms across the country, but that this figure has the potential to increase to between 1,200 and 1,400 sites in the near future.
- 2.5.7 There are a number of emerging leisure concepts which are also helping to anchor retail environments, including bowling alleys, indoor 'ninja' style activity centres, trampolining and crazy golf. These concepts can assist centres in providing a point of difference with the competition, ensure that visitors' dwell times are increased, and assist a town's evening economy.

2.6 Brexit

- 2.6.1 The referendum in June 2016 on the UK's membership of the European Union resulted in a majority vote to leave the EU. The terms of withdrawal were to be negotiated with the

¹⁴ <https://www.theguardian.com/business/2018/feb/19/number-of-uk-restaurants-going-bust-up-by-a-fifth-in-2017>

¹⁵ Ibid

¹⁶ UK Low Cost Gyms – Market headroom forecasts increased report, as reported in the article headlined 'March of budget gyms shows no sign of fatigue', The Times, March 18 2019.

Commission within two years of formal notification by the Government and so leaving by 29 March 2019. At the time of writing this is still unresolved. A number of commentators have forecast that uncertainty during this time will negatively impact upon consumer confidence and expenditure, and that investor decisions may be put on hold.

2.6.2 Whilst it would appear that the short-term impact of 'Brexit' on the retail and leisure sector has perhaps been more modest than some analysts suggested, Verdict published an Economic & Retail Update in September 2016¹⁷ in order to highlight potential future issues. Verdict's report provides the following forecasts:

- Retail growth across Britain in the short term is expected to be flat and growth in the clothing and footwear sector as a whole is likely to be disappointing. However, the weaker pound means that international travellers may spend more, with international brands and premium goods being particularly attractive.
- A weaker pound will also lead to higher import and manufacturing costs, which retailers will pass onto consumers. Verdict anticipates that the food, clothing and footwear sectors will see the greatest inflationary rises.
- Brexit may have a negative impact on the housing market and a consequential adverse impact on those retailers who rely on householders investing in their property. Accordingly, there may be less spending on goods such as furniture, floor coverings, DIY and gardening goods and so on.
- In volume terms, Verdict expects little change to the food retail sector, but notes that inflationary pressures might mean that shoppers spend a greater proportion of their income on their groceries and therefore have a lesser proportion to spend on other goods.

2.6.3 It is therefore evident that Brexit has the potential to impact on future expenditure growth (and also on population growth). As such, there will be a need to monitor the impacts arising from the UK's exit from the EU and for any future update to this TCHR to take appropriate consideration of such changes.

2.7 Implications for Bradford District

2.7.1 Bradford City Centre and the four town centres of Bingley, Ilkley, Keighley and Shipley will continue to face a number of challenges, particularly from increasing competition from the

¹⁷ 'Economic & Retail Update: H2 2016', Verdict, September 2016

internet, business rates, multichannel retailing, polarisation of retailing, and out-of-centre retail/leisure developments. These challenges will impact on the performance and vitality and viability and the future strategy for the centres.

- 2.7.2 As summarised above, the current commercial market is uncertain, and therefore planning to substantially increase retail floorspace in particular is not necessarily supported by market evidence. We have seen the closure or reduction in portfolio of a number of operators in recent years, along with a number of operators seeking to downsize and relocate to units on out of centre retail parks which offer less constrained sites, cheaper rents and wider opportunities and benefits in terms of accessible car parking for shoppers and easy servicing for the retailers. Operators are therefore often seeking to rationalise their portfolio, seeking optimum formats with cheaper rents and floorspace suitable to display a wide range of goods and services. Edge and out of centre retail parks are therefore still popular options for modern retailers and pose a threat to defined centres and particularly Bradford City Centre and Keighley Town Centre as the largest of the defined town centres.
- 2.7.3 Furthermore, whilst it is noted that Bradford City Centre does not currently benefit from a large format convenience foodstore, the 'big four' operators (Tesco, Sainsbury's, Asda and Morrisons) are not typically seeking to expand their portfolio in this manner, and instead looking at alternative options in an attempt to compete directly with the likes of Aldi and Lidl whose share of the market is continually growing given shoppers' decisions to save money.
- 2.7.4 Commercial leisure uses, and particularly food and drink uses alongside new cinema developments were also considered to be one type of development which had a more positive outlook. Whilst we are still seeing a number of food and drink operators seeking to increase their portfolio across the country, we have also unfortunately witnessed the scaling back and even closure of a number of national multiple operators leaving this market also in a state of uncertainty, with previous plans for a cinema and restaurants on the East Parade site in Keighley Town Centre scrapped in 2017.
- 2.7.5 However, the positive private sector investment schemes coming forward in Bradford over the last few years, most notably the opening of the Broadway Shopping Centre, signals a level of investor confidence in the city centre which is not necessarily present elsewhere in the country. With the provision of further public sector investments schemes in the city centre, most notably the new Darley Street Market Hall, then further residents and visitors will be drawn to the city centre and increase their dwell-time.

- 2.7.6 Bradford City Centre, the town centres and retail destinations in Bradford District suffer from direct competition from Leeds City Centre and out of centre shopping destinations within surrounding authorities of Leeds and Kirklees in particular. The out of centre provision at Birstall Shopping Park and The Owlcotes Centre in particular provides a competing retail offer to that available in Bradford City Centre, and both of these destinations are proposed to be extended with additional units.
- 2.7.7 The town and smaller centres in the district cannot compete with Bradford and Leeds City Centres or the major out of centre shopping destinations in the surrounding authorities of Leeds and Kirklees. The ongoing difficulties in bringing the East Parade site in Keighley Town Centre forward for retail or leisure development exemplifies the impact of current trends on secondary centres in the district.
- 2.7.8 The internet is an ongoing source of competition for Bradford City Centre and the town centres, and residents increasing purchases of goods online has had negative effects on defined centres.
- 2.7.9 It is therefore important for defined centres in the district to be able to respond to continued changes in the retail and leisure sector. Providing (or continuing to provide) an offer that meets residents' needs whilst taking full advantage of their assets will distinguish them from competing centres and out-of-centre retail and leisure destinations. Whilst the growth of online retailing is likely to have had a detrimental impact on the turnover of Bradford District's retail destinations, going forward there may be opportunities for the district's retail facilities to benefit from multi-channel retailing in order to help drive footfall and sustain retailer representation.

3.0 Planning Policy Context

3.1 Introduction

3.1.1 This Study seeks to provide important evidence to assist in the production of future retail and town centre planning policy. It is appropriate to review existing national planning policy of relevance to town centre matters. This section also reviews and summarises Bradford District's adopted planning policy, insofar as it is relevant to retail, leisure and other town centre matters, in order to consider the Council's existing strategy in respect of its defined retail centres and wider provision of leisure services within Bradford City Centre, the town, district and local centres and the wider district.

3.2 National Planning Policy Framework

3.2.1 The revised National Planning Policy Framework (NPPF) was published on the 19th February 2019, which replaced the previous version of the NPPF published on the 24th July 2018.

3.2.2 Section 2 of the NPPF makes clear that it retains the presumption in favour of sustainable development first set out in the NPPF at its heart as set out in paragraph 11. For plan-making, this means that local planning authorities should positively seek opportunities to meet the development needs of their area, with an emphasis on plans having sufficient flexibility to adapt to rapid change.

3.2.3 Section 3 relates to plan-making and paragraph 15 requires that succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

3.2.4 The Government's proposals for delivering sustainable development through the planning system are subsequently set out in Sections 3 to 17 of the NPPF. Of most relevance to retail and town centre matters are Sections 6, 'Building a strong, competitive economy', and 7, 'Ensuring the vitality and viability of town centres'.

- 3.2.5 Paragraph 80 in Section 6 of the NPPF maintains the Government's commitment set out in the original NPPF to supporting economic growth, stating at paragraph 80 that, *'Planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt'*. It continues that, *'Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development'*.
- 3.2.6 Paragraph 80 advises that planning policies should *'set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth'* as well as *'set criteria, or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period'*.
- 3.2.7 Paragraph 85 at Section 7 indicates that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. It continues that planning policies should:
- *'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;*
 - *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;*
 - *retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*
 - *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'*
 - *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*
 - *recognise that residential development often plays an important role in ensuring the*

vitality of centres and encourage residential development on appropriate sites.'

3.2.8 It is emphasised that the revised NPPF therefore indicates that planning policies only need to look at least ten years and not necessarily over the full plan period when allocating sites to meet the likely need for town centre uses.

3.2.9 Paragraph 86 states that local planning authorities should apply a sequential approach to planning applications for main town centre uses that are neither in an existing centre nor in accordance with an up-to-date plan. It states that that:

'Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period of time) should out of centre sites be considered.'

3.2.10 Paragraph 87 continues that:

'When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.'

3.2.11 The following paragraph indicates that that the sequential approach should not apply to applications for small scale rural offices or other small-scale development.

3.2.12 Paragraph 89 of the NPPF then sets out a twin impact test, stating that:

'When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sq.m of gross floorspace). This should include assessment of:

- *the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- *the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).'*

3.2.13 Finally, paragraph 90 indicates that where an application fails to satisfy the sequential test or is likely to have a significant adverse impact on one or more of the considerations in paragraph 89, it should be refused.

3.3 Ensuring the Vitality of Town Centres Planning Practice Guidance

3.3.1 The 'Ensuring the Vitality of Town Centres' National Planning Practice Guidance was launched in March 2014. It provides as an on-line resource a concise summation of how retail and main town centre planning policy is to be applied in practice. The objectives of the Practice Guidance remain comparable with those of its predecessor, with there being a stated requirement for local planning authorities to plan positively and support town centres in order to generate local employment, promote competition within and between town centres, and create attractive and diverse places for users.

3.3.2 The Practice Guidance requires local planning authorities to fully assess and plan to meet needs for main town centre uses through the adoption of a 'town centre first' approach. Paragraph 002 confirms that this should be delivered through a positive vision or strategy which is communicated through the development plan. Paragraph 003 establishes that the strategy should be facilitated through active engagement and consultation with a range of public and private stakeholders (including Business Improvement Districts, community groups, private businesses and town centre managers)

3.3.3 Paragraph 004 of the Ensuring the Vitality of Town Centres Planning Practice Guidance states that any strategy should be based on evidence which clarifies the current state of town centres and opportunities to meet development needs and support centres' vitality and viability. Such strategies should seek to address the following matters:

- the appropriate and realistic role, function and hierarchy of town centres in the area over the plan period, including an audit of the vitality and viability of existing town centres and their ability to accommodate new development;
- consideration of the vision for the future of each town centre and the most appropriate mix of uses;
- the assessment of the scale of development that a town centre can accommodate and the associated need for expansion;
- the assessment of how existing land can be used more effectively;
- consideration of any opportunities for accessibility and wider environmental quality improvements;

- what other complimentary strategies are necessary or appropriate to enhance the town centre and deliver the future vision;
- the role different stakeholders have in delivering the vision; and
- devising appropriate policies to address environmental issues town centres face, including identifying opportunities to conserve and enhance the historic environment.

3.3.4 Paragraph 006 of the Practice Guidance identifies a series of key indicators which are of relevance in assessing the health of a centre over time. These key indicators include:

- Diversity of uses, including the proportion of vacant street level property;
- Commercial yields on non-domestic property and commercial rents;
- Retailer representation and intentions to change representation;
- Pedestrian flows and accessibility;
- Perception of safety and occurrence of crime;
- State of the town centre environmental quality;
- Balance between independent and multiple stores;
- Extent to which there is evidence of barriers to new businesses opening and existing businesses expanding; and
- Opening hours, the availability and extent to which there is an evening and night time economy.

3.3.5 Paragraph 009 reaffirms the town centre first policy in the form of the sequential test, which requires local planning authorities to undertake an assessment of candidate sites' availability, suitability and viability when preparing their local plan. Such an assessment should also consider the scale of future needs and the type of land required to accommodate main town centre uses.

3.4 Relaxation of Permitted Development Rights

3.4.1 At a national level, recent changes to the Town and Country Planning (General Permitted Development) Order 1995 have sought to support the diversification and vitality of town centres. The changes follow the Portas Report's recommendation to make it easier to change surplus space in order to provide for the effective re-use of buildings and so maintain the vitality and viability of centres.

3.4.2 The Town and Country Planning (General Permitted Development) (England) Order 2015 came into force on 15 April 2015. The Order acts, *inter alia*, to consolidate and replace the Town and Country Planning (General Permitted Development Order 1995) and to provide additional permitted development rights. It should be noted that conditions and restrictions apply, and that prior approval is generally required in order to implement development. The new rights include:

- a permitted change of use from retail/financial services (Class A1/A2), betting offices and pay day loans shops to residential (Class C3);
- a permitted change of use from amusement arcade/casino (*sui generis* use) to residential use (Class C3);
- a permitted change from retail (Class A1) to financial services (Class A2);
- a permitted change from retail/financial services (Class A1/A2) to food and drink (Class A3);
- a permitted change from retail/financial services (Class A1/A2), betting offices, pay day loan shops and casinos to assembly and leisure uses (Class D2);
- a permitted change for the flexible change of use from any retail (Class A1), financial service (Class A2), restaurant or café (Class A3), drinking establishment (Class A4), hot food takeaway (Class A5), office (Class B1), non-residential institution (Class D1) or assembly and leisure (Class D2), betting office or pay day loan shop to a flexible use falling into Class A1, A2, A3 or B1 for a period of two years;
- an extension of the temporary permitted development rights introduced in May 2013 for extensions to shops, offices, industrial and warehouse buildings to support business expansion and the economy so they apply permanently;
- the erection of click and collect facilities within the curtilage of a retail shop; and
- modifications to the size of an existing retail shop loading bay.

3.4.3 The Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2016 subsequently came into force on 6 April 2016. The Amendment provides for the change of use of launderettes to residential uses as permitted development, and acts to make permanent previous temporary provisions which permit the change of use from office (Class B1) to residential use. A condition allowing the local planning authority to consider noise impacts on the intended occupants of the development from premises in commercial use is included in the extended right.

3.4.4 Additional permitted development rights were introduced through the Town and Country Planning (Permitted Development, Advertisement and Compensation Amendments) (England) Regulations on 25th May 2019. These rights include:

- a permitted change of use of retail/financial services (Class A1/A2), hot food take aways (Class A5), betting office, pay day loan shop and laundrettes (Sui Generis) to offices (Class B1a);
- a permitted change from hot food takeaway (Class A5) to residential (Class C3)
- extension of the existing permitted development right for the flexible change of use from any A1, A2, A3, A5, B1, D1, D2, betting office or pay day loan shop to a temporary flexible uses (Classes A1, A2, A3 or B1) to allow for specific additional community uses such as exhibition halls, public libraries, museums, clinics, health centres or art galleries, and extends the period from two to three years

3.4.5 The intended consequence of the above measures is to secure the redevelopment and reuse of premises. It is considered that the relaxation in respect of changes of use to residential are more likely to encourage re-use of offices in larger metropolitan areas which may benefit from a greater supply of office buildings.

3.4.6 Previously, planning permission was not required for a change of use from class A4 (pub) to certain other uses, including Class A1, provided that the pub was not listed as an Asset of Community Value ('ACV'). The Neighbourhood Planning Act 2017 was given Royal Assent on 27 April 2017 and, amongst other things, legislated for changes to permitted development rights ('PDR') for pubs. The relevant provisions of the Neighbourhood Planning Act 2017 led to the amendment of PDR's as follows:

- Removing the right to demolish buildings in use (or last used) for a purpose within Class A4 (drinking establishments) including drinking establishments with expanded food provision.
- Removing drinking establishments from PDR's under Schedule 2 Part 3 Class A of the Order which previously allowed the change of use of drinking establishments to Class A1 (shops) or Class A2 (financial and professional services) subject to certain limitations, conditions and restrictions.
- Establishing a new PDR under Schedule 2 Part 3 Class AA for the change of use of a building and land within its curtilage as follows:

- From Class A4 (drinking establishments) to a use as a drinking establishment with expanded food provision - a new Use Class AA (within use Class A4 and Class A3 (restaurants and cafes); and
- From a use as a drinking establishment with expanded food provision back to a use solely under Class A4.
- Removing drinking establishments from PDR under Schedule 2 Part 3 Class B which previously allowed the change of use of drinking establishments to a use under Class A3 (restaurants and cafes).
- Amending the PDR's for a change of use to a state-funded school for two academic years within Schedule 2 Part 4 Class C of the Order so that this no longer applies to buildings within Class A4 (drinking establishments) or drinking establishments with expanded food provision.
- Revising the PDR's for a change of use to a temporary flexible use within Classes A1, A3 and B1 under Schedule 2 Part 4 Class D of the Order so that this no longer applies to buildings within Class A4 (drinking establishments) or drinking establishments with expanded food provision.

3.5 Bradford Development Plan Policy

- 3.5.1 The development plan for Bradford currently comprises the Bradford Core Strategy Development Plan Document ('the Core Strategy'), Bradford City Centre Area Action Plan (Adopted December 2017), Shipley and Canal Road Corridor Area Action Plan (Adopted December 2017), Bradford Waste Management Development Plan Document (Adopted October 2017), and the saved policies from the Bradford Replacement Unitary Development Plan ('the RUDP', adopted 2005).
- 3.5.2 The Council are currently undertaking a partial review of their Core Strategy in light of the publication of the revised NPPF to ensure that its strategic policies remain up-to-date and effective. The Partial Review was recently consulted upon for a period of 8 weeks (July – September 2019).
- 3.5.3 In addition to the Core Strategy Partial Review, the Council are also preparing their Site Allocations Development Plan Document, which will allocate sites to meet the development needs of the area outside of those subject to the adopted Area Action Plans. Once adopted, this will supersede the RUDP in its entirety. These various current and emerging documents, and including Neighbourhood Plans which need to be consistent with the overall strategy,

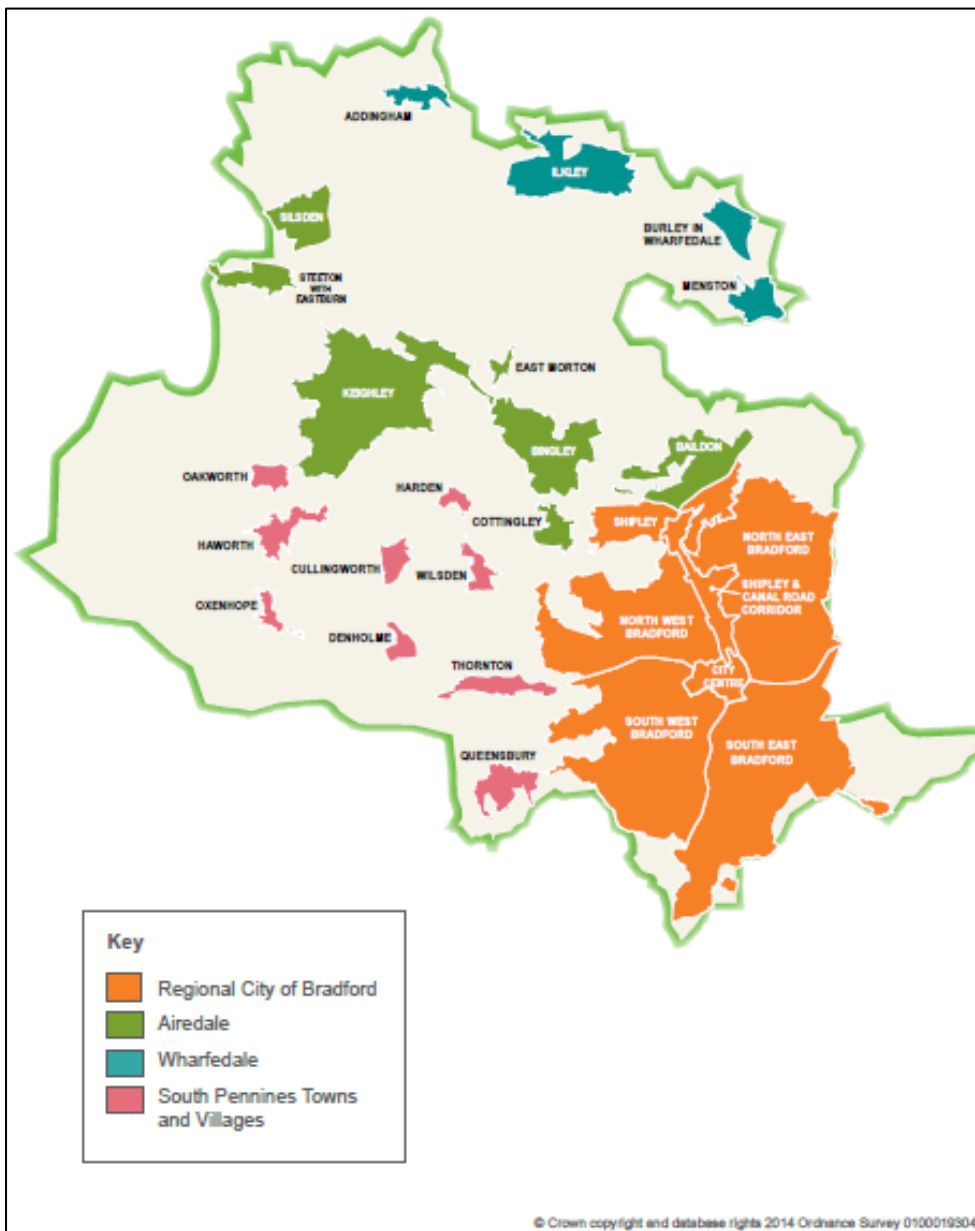
will together provide the comprehensive development plan for the District for which his Study will provide part of the evidence base albeit, as with all other matter, the evidence is ever changing.

- 3.5.4 Below is a summary of the adopted and emerging retail, leisure and town centre development plan policies for Bradford District at the time of writing.

3.6 Bradford Core Strategy Development Plan Document

- 3.6.1 The Bradford Core Strategy was adopted on 18 July 2017. It sets out the broad aims and objectives for sustainable development within the Bradford District for the next 15 to 20 years until 2030. It also sets out strategic policies for guiding and restraining development, and the broad locations for new housing, employment and infrastructure investment. The Colliers Midsummer Retail Report referred to previously suggests that the housing growth being planned will play a significant role in the future scale, distribution and character of market demand for retail and leisure over the Plan period.
- 3.6.2 Figure IN2 of the Core Strategy divides the plan area into four separate sub-areas; Wharfedale comprises the northernmost section of the district and centres on the towns located along the River Wharfe, Airedale in the centre of the district includes the towns located along the River Aire, the South Pennines Towns and Villages in the southern and western part of the district, and the City of Bradford in the eastern section.
- 3.6.3 The spatial vision for the plan area states that, by 2030, Bradford District will have become a key driver of the wider Leeds City Region economy and become a sought after location to where people want to live, do business, shop, and spend their leisure and recreation time.
- 3.6.4 To achieve this, the Core Strategy sets out several strategic objectives, which include:
- 'To recognise and fully exploit the role of the City of Bradford and the towns along Airedale and Wharfedale as dynamic locations of choice for housing and economic growth within the Leeds City Region'
 - 'to promote, manage and develop the image and role of Bradford City Centre as a regionally significant business, commercial, shopping, civic and cultural area'
 - 'To ensure Bradford is a diverse city where the needs of citizens are met through improved access to good quality homes, jobs, shopping, cultural facilities, health and education provision and community facilities'
 - 'Provide accessible and varied opportunities for leisure and recreation'

Figure 3.1 Bradford District Settlements



3.6.5 The relevant Policies contained within the Core Strategy are summarised below:

Policy EC5 – City, Town, District and Local Centres

3.6.6 This is the primary policy relating to retail development for Bradford District. It states that planning decisions, plans, strategies, investment decisions and programmes should seek to sustain and enhance the vitality and viability of a network and hierarchy of centres by seeking to ensure that new retail, leisure and office development, of an appropriate scale, is encouraged in sequentially preferable locations. The sequential locations, order of their preference, are set out below:

- The City Centre of Bradford;
- The Town Centres of Keighley, Ilkley, Bingley and Shipley
- The district centres of Five Lane Ends, Girdlington, Great Horton, Greengates, Thornbury, Tong Street and Odsal;
- The Local Centres of Addingham, Allerton, Baildon, Barkerend Road, Bolton Junction, Burley-in-Wharfedale, Carlisle Road/Whetley Hill, Clayton, Cottingley, Crossflatts, Cross Road (Keighley), Cullingworth, Denholme, Duckworth Lane, Eccleshill, Fell Lane/Oakworth Road (Keighley), Frizinghall, Harden, Haworth (Main Street), Haworth (Mill Hey), Heaton, Holme Wood, Horton Grange, Idle, Laisterdyke, Leeds Road, Lidget Green, Low Moor, Marshfields (Manchester Road), Menston, Oak Lane (Manningham), Oakworth, Princeville, Queensbury, Riddlesden, Saltaire, Silsden, Steeton with Eastburn, Sticker Lane, Thornton, Undercliffe, White Abbey Road, Wibsey, Wilsden, Wrose and Wyke.

- 3.6.7 The Policy states that the City Centre should be the focus for a wide diversity of economic activity, including significant offices, residential, convenience and comparison retail including traditional and specialist markets, leisure, entertainment, arts, culture, tourism, intensive sports and recreation uses. The City Centre should also be the priority location for promotional events and activities.
- 3.6.8 For the Town Centres, the Policy specifies that these should be the focus for office, residential, convenience and comparison retail, including traditional and specialist markets, leisure, entertainment, arts, culture, tourism, intensive sports and recreation uses that are appropriate to the centres, provided that proposals do not have a significant adverse impact on the vitality and viability of Bradford City Centre and other nearby Town Centres.
- 3.6.9 For District Centres, the Policy states that these should be the focus for convenience retail and limited comparison retailing. It also encourages financial services, restaurants, cafes and local public facilities in order to enable people to meet their daily needs and minimise the need to travel, providing proposals do not have a significant adverse impact on Bradford City Centre and other nearby Town Centres.
- 3.6.10 With regards to Local Centres, these should be the focus for appropriately sized local supermarkets and a variety of small shops of a local nature to meet people's day to day needs and minimise the need to travel.

3.6.11 Criterion E of the Policy states that the sequential test will apply to all development proposals which are not within the main town centre and are not in accordance with the development plan documents. Main town centre uses (as defined in the NPF) should be located in the defined centres in the first instance, then edge of centre locations if suitable sites are not available, then out of centre locations. Criterion F of the Policy also sets size thresholds for when an impact assessment is required when developments are proposed in edge of centre or out of centre locations, these are:

- Over 1,500 sq.m gross floor space for Bradford City Centre;
- Over 1,000sq.m gross floor space for Keighley, Shipley, Bingley and Ilkley;
- Over 500 sq.m gross floor space for District Centres; and
- Over 200 sq.m gross floor space for Local Centres.

3.6.12 The policy also states that allocations, designations and associated development management policies on centre boundaries, primary shopping areas ('PSA'), primary and secondary frontages and sites to meet at least the first five years' worth of identified need will be determined through the Allocations DPD, Bradford City Centre AAP and the Shipley and Canal Road Corridor AAP.

3.6.13 Criterion G of the Policy states that proposals for retail development will only be permitted outside of the defined PSA's providing: the proposed development is of an appropriate scale; there are no alternative central sites within the PSA which are suitable, viable or available, with preference then given to expansion areas, edge of centre sites before out of centre sites are considered; the proposed development will not have a significant adverse impact on the vitality and viability of existing Town, District and Local Centres; and the proposed development is accessible to all modes of transport, especially public transport.

3.6.14 Criterion H advises that proposals for leisure, offices and other main town centre uses will only be permitted on sites outside of the city, town and district boundaries where; the proposed development is of an appropriate scale; there are no alternative central sites within the PSA which are suitable, viable or available, with preference then given to expansion areas, edge of centre sites before out of centre sites are considered; the proposed development will not have a significant adverse impact on the vitality and viability of existing Town, District and Local Centres; the proposed development is accessible to all modes of transport, especially public transport; the proposed development would not result in unacceptable highways impacts and the development would not undermine the economic delivery strategy of the Core Strategy.

3.6.15 The Partial Review of the Core Strategy is proposing the following changes to Policy EC5:

- The removal of Odsal as a proposed District Centre; and
- Changes reflecting the updated NPPF, specifically regarding development viability and the removal of some town centre uses from the requirement to undertake sequential tests and impact assessments.

Policy SC4 – Hierarchy of Settlements

3.6.16 Whilst the Policy does not explicitly relate to retail development, it does seek to guide and control the distribution of growth and development in Bradford District.

3.6.17 It first establishes that the Regional City (comprising Bradford, along with Shipley and Lower Baildon) will be the district's focus for housing, employment, shopping, leisure and cultural activities and that the majority of the district's development will be directed to this area. The policy aims to transform the Regional City into an attractive, cohesive and inclusive place where people want to live, work and spend time in. To achieve this, the Policy states plans, strategies and planning decisions should, amongst other things, seek to maintain and strengthen the identity and role of Bradford City Centre and Shipley Town Centre as accessible and vibrant focal points for high trip generating uses to support the daytime and evening economy.

3.6.18 The Policy then defines the district's Principal towns (comprising Ilkley, Keighley and Bingley) as the main local focus for housing, employment, shopping, leisure and cultural activities and facilities. The policy seeks to ensure that planning decisions, as well as plans and strategies, enhance the vitality and viability of the town centres.

3.6.19 Paragraph 3.68 of the Core Strategy establishes the Principal centres as being of district wide significance in terms of their role as service, employment and transport hubs for surrounding areas. These centres are considered to fulfil a district wide significance role in terms of the available services, employment centres and transport hubs for the surrounding areas.

3.6.20 The third-tier centres, or Local Growth Centres, are defined as; Burley in Wharfedale, Menston, Queensbury, Thornton, Steeton with Eastburn and Silsden. The policy encourages the enhancement of the vitality and viability of the Local Growth Centres. These centres are generally considered to support the functions and services of their respective rural areas.

3.6.21 Fourth tier centres, or Local Service centres, are identified as; Addingham, Baildon, Cottingley, Cullingworth, Denholme, East Morton, Harden, Haworth, Oakworth, Oxenhope

and Wilsden. The policy seeks to retain and improve local services and facilities and also support measures to diversify the economy, including the tourism and leisure offer.

Sub Area Policy BD1 – The Regional City of Bradford including Shipley and Lower Baildon

- 3.6.22 The Policy sets out the pattern of development within the sub area, the growth priorities and the urban regeneration and renewal priorities. With regards to Bradford City Centre, the Policy states there will be a requirement for a high-quality public realm linked to City Park and other open spaces in order to provide a unique setting for shopping, tourism, culture and leisure experiences as well as a new Central Business District supplying grade A office space. The regeneration of the City Centre will be supported through effective management and enhancement of the historic environment.
- 3.6.23 The Policy states that Bradford City Centre will be prime location for office development, shopping, leisure and tourism, focused through the Central Business District, City Park and the Bradford Learning Quarter initiatives.
- 3.6.24 With regards to Shipley Town Centre, the Policy notes this as a location for a mix of retail, leisure and office developments, benefitting from excellent railway connections and enhanced road links to Bradford and Leeds city centre.
- 3.6.25 The Policy also encourages leisure and tourism uses in Saltaire which include enhancements to public realm, improved links between Saltaire and Shipley Town Centres whilst respecting and preserving the UNESCO World Heritage Site status.
- 3.6.26 The Partial Review of the Core Strategy is proposing the following changes to Policy BD1:
- Reduction of the housing requirement for the City of Bradford from 27,750 to 18,400 and changes to the spatial distribution within the sub-area;
 - Reduction in the employment land requirement for the City of Bradford from 100ha to 40ha; and
 - Revised regeneration areas, economic aspirations and transport infrastructure objectives.

Sub Area Policy BD2 – Investment Priorities for the Regional City of Bradford

- 3.6.27 The Policy sets out the key areas of investment within the sub area and sets out the Policy will support the regeneration of Bradford City Centre to deliver enhancements to the public

realm, new central business district, improvements to the railway stations and maximise the potential of heritage assets.

3.6.28 The Partial Review of the Core Strategy is proposing the following changes to Policy BD2:

- Revised economic aspirations and transport infrastructure objectives.

Sub Area Policy AD1 – Airedale

3.6.29 The Policy's main purpose is to apportion housing development to the towns within the sub area, set out the growth priorities and the urban regeneration and renewal priorities. It states:

- Keighley Town Centre will see high-quality mixed-use developments, including at the former Keighley College site, Market Hall, Cavendish Court and Cavendish Retail Park.

3.6.30 The Partial Review of the Core Strategy is proposing the following changes to Policy AD1:

- Reduction of the housing requirement for the Airedale from 8,450 to 4,800 and changes to the spatial distribution within the sub-area;
- Reduction in the employment land requirement for Airedale from 30ha to 15ha; and
- Revised regeneration and renewal priorities, economic aspirations and transport infrastructure objectives.

Sub Area Policy AD2 – Investment Priorities for Airedale

3.6.31 The Policy seeks to deliver transformation and change in the sub area through measures such as economic development. One of the specific measures the Policy supports is the regeneration of Keighley and Bingley Town Centres to deliver enhancements to the public realm, mixed use retail and leisure schemes on brownfield sites and improvements to the railway stations.

3.6.32 The Partial Review of the Core Strategy is proposing the following changes to Policy AD2:

- Revised economic aspirations and transport infrastructure objectives.

Sub Area Policy WD1 – Wharfedale

3.6.33 The Policy identifies that Ilkley will have an important role as the Principal Town in the Wharfedale sub area with cultural, retail, tourism and leisure functions. It also seeks to support Ilkley Town Centre's role as a location for a mix of retail, leisure and office development at an appropriate scale.

3.6.34 The Policy states that support will be given to Burley in Wharfedale, Addingham and Menston for limited retail and leisure developments to meet daily needs.

3.6.35 The Partial Review of the Core Strategy is proposing the following changes to Policy WD1:

- Reduction of the housing requirement for the Wharfedale from 2,500 to 1,425 and changes to the spatial distribution within the sub-area; and
- Revised economic aspirations and transport infrastructure objectives.

Sub Area Policy WD2 – Investment Priorities for Wharfedale

3.6.36 The Policy seeks to deliver transformation and change in the Wharfedale sub area. One of the measures identified is to invest in Ilkley Town Centre to deliver enhancements to the public realm, mixed use retail and leisure schemes on key brownfield sites.

3.6.37 The Partial Review of the Core Strategy is proposing the following changes to Policy WD2:

- Revisions to include green infrastructure and clarifying potential Green Belt releases as 'limited'.

Sub Area Policy PN1 – South Pennine Towns and Villages

3.6.38 The Policy supports the role of Queensbury and Thornton as locations for a mix of community facilities and seeks to promote sustainable tourism that respects the sub area's heritage assets.

3.6.39 The Partial Review of the Core Strategy is proposing the following changes to Policy PN1:

- Reduction of the housing requirement for the Pennine Towns and Villages from 3,400 to 1,525 and changes to the spatial distribution within the sub-area; and
- Revised economic aspirations and transport infrastructure objectives.

Sub Area Policy PN2 – Investment Priorities for the Pennine Towns and Villages

3.6.40 The policy seeks to encourage partnership working between the public and private sectors, key stakeholders and communities to support suitable economic, retail and leisure development which is of a scale that is appropriate to the settlement, provides sensitive enhancement of heritage assets or public realm and involves the re-use of an existing building. The Partial Review of the Core Strategy is proposing minor amendments to the text of this policy.

Policy EC1 – Creating a successful and competitive Bradford District economy within the Leeds City Region

- 3.6.41 Whilst primarily relating to business and commercial uses, the Policy reiterates that planning decisions and strategies should help to deliver investment in Bradford City Centre and the Principal towns and should support retail, leisure and tourism as key economic and employment generators across Bradford District. The Partial Review of the Core Strategy is proposing significant amendments to the text of this policy to reflect the latest evidence presented in the Employment Needs Assessment and Land Review, and now aligns with the Bradford Growth Strategy 2040.

3.7 Bradford Replacement Unitary Development Plan

- 3.7.1 The Bradford RUDP was adopted in October 2005. In July 2017, many Policies contained within the RUDP were deleted following the adoption of the Core Strategy, however there are still several “saved” policies contained within the RUDP that are of relevance:
- Policy CT1 – Seeks to ensure that new developments in the city and town centres are developed in accordance with the area’s respective Policy statements.
 - Policy CT4 – Seeks to ensure that developments within the central shopping areas safeguard existing arcades and canopies and incorporate new ones, where appropriate.
 - Policy CT5 – Seeks to ensure and safeguard the defined PSA’s are used primarily by A1 Use Classes and sets out when non-A1 use classes are acceptable and appropriate.
 - Policy CT6 – Seeks to protect the amenity of people who use the city or town centres from proposals which would have significant adverse effects.
 - Policy CR1A – Allows for retail development within the central shopping areas of the city centre and town centre or, where sites cannot be found within the central shopping area, and with a flexible approach being taken, within the defined boundary of the city or town centres. The Policy also allows for retail development in the defined District and Local centres, providing they are of a scale which is compatible with the role of the centre it serves.
 - Policy CR4A – Sets out the criteria when retail development will be allowed outside of the areas defined in Policy CR1A, these include: demonstrating the need for additional floorspace; demonstrating there are no alternative sites available in the central shopping area, defined city / town centre or edge of the city / town centre; the proposal would be unlikely to have an adverse effect on the vitality or viability of a

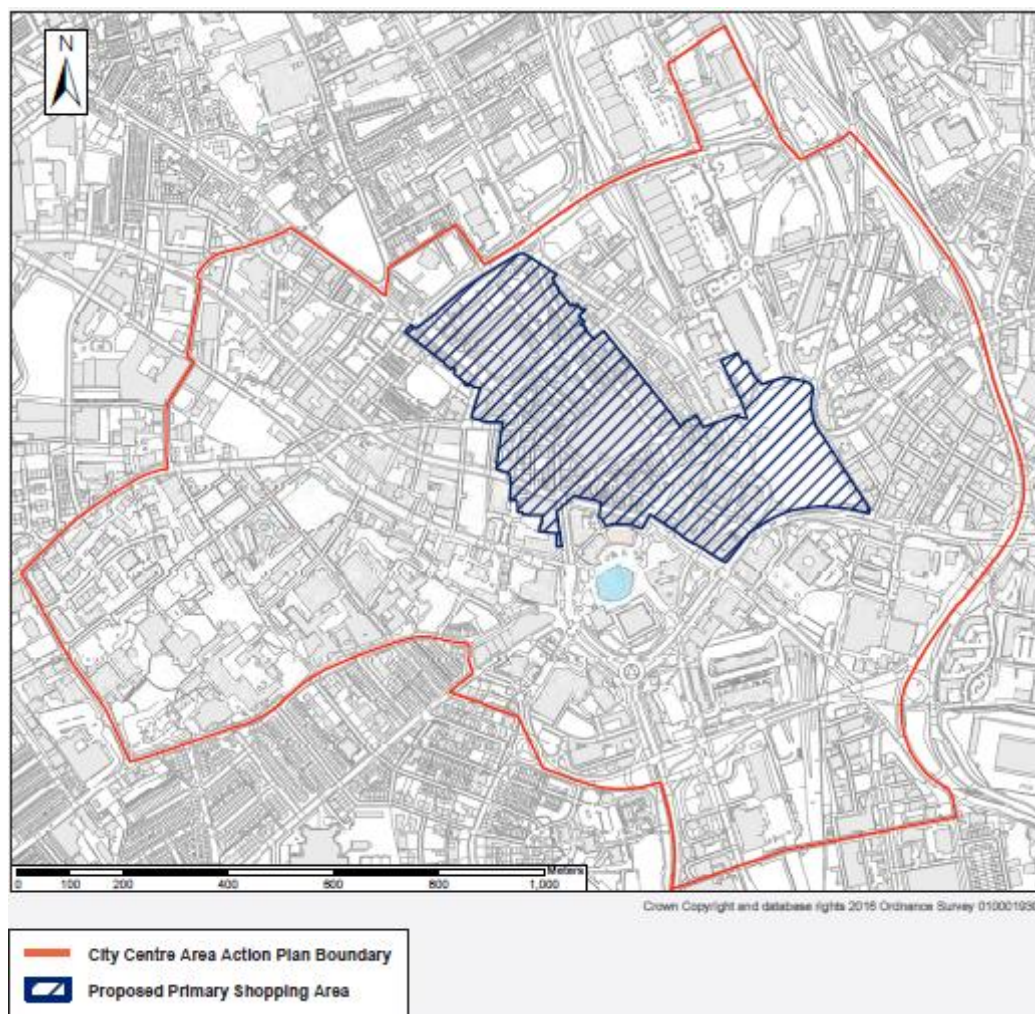
defined centre and other criteria.

- Policy CR5A – establishes that premises where sales would be limited to raw materials, motor vehicles and parts and gardening supplies will be permitted outside existing centres.
- Policy CL1 – allows the development of leisure and entertainment facilities within the defined centres providing it is appropriate in scale relative to the centre in question and the size of its catchment.
- Policy CL2 – Proposals for entertainment and leisure uses which would attract a large amount of people from a wide area will only be allowed in the designated expansion areas outside the city and town centres providing there are no alternative sites in the defined centres and the proposals are of an appropriate scale to the role of the centre and its catchment.
- Policy CL3 – Proposals for leisure and entertainment developments that would attract a lot of people from a wide area will not be permitted on sites outside of the city, town and district centres unless several criteria are met, including: if the need for additional leisure / entertainment floorspace can be demonstrated; there are no alternative sites in the appropriate centre, expansion area, edge of centre or closer to the centre; the scale is compatible with the role of the centre and size of the catchment; and the development is unlikely to have an adverse effect on the vitality and viability of any defined centre.

3.8 Bradford City Centre Area Action Plan

- 3.8.1 The Bradford City Centre Area Action Plan (AAP) was adopted in December 2017 and incorporates areas such as Little Germany, Goitside, Bradford College campus and Bradford University Campus. It specifies that Bradford City Centre is the priority regeneration area for Bradford District.
- 3.8.2 The vision for the AAP is to help assist in the delivery of thousands of new jobs through supporting the expansion of new retail, leisure and office premises through land use allocations and a flexible policy approach. One the key objectives defined in the AAP to help achieve this vision is to develop a unique, high quality shopping and leisure experience which reflects the city's cultural mix. The Plan area, and the PSA, can be found below in Figure 3.2.

Figure 3.2 – AAP boundary and Primary Shopping Area



3.8.3 The AAP divides the City Centre into six sub areas, which are based on their unique characteristics and development pattern. Each sub area has individual site allocated for specific development. The sub areas, and their development focus are as follows:

- The Central Business and Leisure District – Business core of the City Centre and the focus of Grade A office space and leisure uses.
- Little Germany and Cathedral Quarter – Will be the focus of new comparison retailing in the Broadway Centre and residential led mixed-use development.
- The Shopping and Markets Area – The focus for small independent retailing and leisure, with the introduction of residential.
- Goitside – Will be the focus of city living with supporting small scale leisure and retail.
- The Learning Quarter – Will be the focus for expanded education and student living.
- The Southern Gateway – will be transformed from former industrial to a focus for

residential and supporting uses.

3.8.4 The AAP also contains a series of strategic policies which are summarised below.

Policy SL1 – Retail Development

3.8.5 Policy SL1 seeks to maintain and enhance Bradford City Centre’s role as a focus for main town centre uses and the PSA’s function as a focus of retail activity. It seeks to direct all retail development into the PSA, with any development proposals for retail outside of this only being permitted where it is in accordance with the sequential test (as set in Core Strategy Policy EC5). The Policy also sets a requirement that any retail development proposal on the edge or outside of the PSA with a floorspace greater than 1,500 m² will be subject to an impact assessment. The Policy also supports the development of other non-retail main town centre uses, providing they are of an appropriate scale.

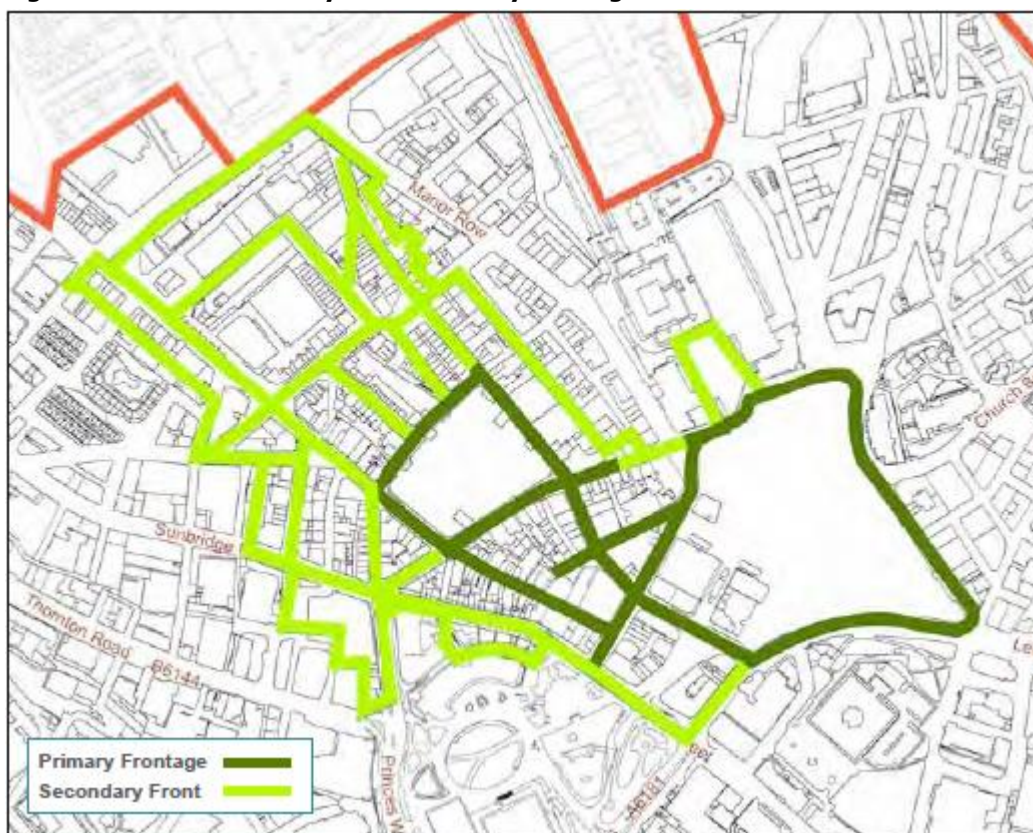
Policy SL2 – Primary and Secondary Frontages

3.8.6 The primary goal of Policy SL2 is to protect and enhance the defined Primary and Secondary Shopping Frontages. It establishes that the changes of use to A3 and A4 Use Classes within the Primary Frontages will be supported providing a series of criteria are satisfied. This includes ensuring the proposed use would make a positive contribution to the vitality and viability of a centre, there would not be a concentration of non-retail uses which would be detrimental to the vitality of the shopping street; the proposed use would not dominate or fragment the shopping frontage by result of its scale and other aspects.

3.8.7 For Secondary Retail Frontages, the development of any retail or other related leisure use (Use Classes A2-A5 and D1 and D2) will be acceptable where they would maintain or enhance the function of the shopping area. In all instances, the proposed uses are expected to compliment the retail function of the shopping frontage and not harm its viability, vitality or diversity; not harmfully dominate or fragment frontages; generate a reasonable amount of footfall; and be compatible with the shopping area.

3.8.8 The adopted Primary and Secondary Frontages are shown below in Figure 3.3.:

Figure 3.3: Defined Primary and Secondary Frontages



Policy SL3 – Improving the Connections Between Shopping Areas

3.8.9 Supports the provision of better wayfinding in the form of updated, improved and increased signage throughout the City Centre. It also expects the design of new developments to be well integrated into the existing fabric of the city centre and facilitate through movements of pedestrians into other existing shopping areas.

Policy SL4 – Cultural Assets

3.8.10 The Policy seeks to support the sustainable expansion of existing, and assist in the creation of, new cultural attractions in the city centre. Existing cultural and tourist facilities should be retained in those uses and enhanced where possible unless appropriate replacement facilities are provided in a suitable alternative location.

3.9 Shipley and Canal Road Corridor Area Action Plan

3.9.1 The Shipley and Canal Road Corridor AAP was adopted in December 2017 and incorporates a large area to the north of Bradford City Centre along the alignment of Canal Road (A6037)

up to, and incorporating, Shipley Town Centre. The AAP was developed as a response to the vision to transform the area into an exemplar eco settlement.

- 3.9.2 The vision for the whole action plan area is that by 2030, it will have seen the delivery of over 3,100 new homes which are supported by new businesses, retail, leisure and community facilities. The strategic objectives outlined in the AAP in order to achieve the vision include supporting economic growth and supporting the vitality and viability of Bradford City Centre and Shipley Town Centre.
- 3.9.3 The action plan area is broken down into three separate sub-area. These are Shipley, the central section (which is the area ranging in between Shipley and the A6177), and the Bradford City Centre fringe. For Shipley Town Centre specifically, the vision is to enhance its retail offer supported by a wider range of business, leisure and community uses alongside new homes. Market Square will remain the focus for the town centre, with new refurbished buildings alongside high quality public realm, reconnecting the town with its built heritage.
- 3.9.4 For the Central section, whilst the majority of this area is intended to be the location of the residential development, the vision sets out that a new neighbourhood centre will be the focus for new and existing communities, providing local shops, community and leisure uses.
- 3.9.5 For the City Centre fringe area, the vision sets out that by 2030 the area has maintained its role as a sustainable edge of centre location. The Canal Road Employment Area and Valley Road Retail Area will remain an attractive employment, business and bulky goods location.
- 3.9.6 The AAP allocates sites for specific forms of developments, including mixed use development and small-scale retailing, some of which fall within Shipley Town Centre. It also sets out a series of strategic policies, which are summarised below:

Policy SCRC/SE3 – Valley Road Retail Area

- 3.9.7 The Policy identifies the area as an edge of centre expansion zone for large scale bulky goods and retail warehousing. Proposals within the area will be assessed in line with Core Strategy Policy EC5.

Policy SCRC/SE4 – Strategy for Retail Development

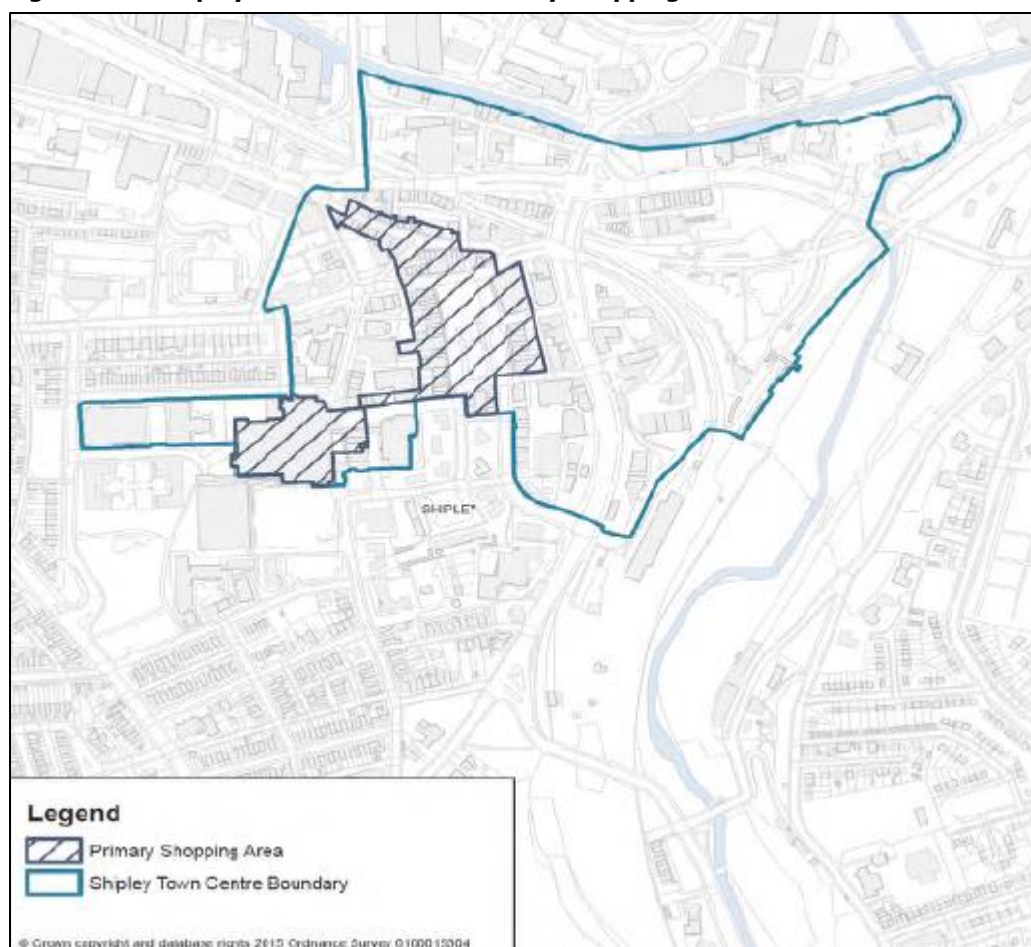
- 3.9.8 Development in the plan area will include retail growth which is focused on sites within and adjacent to Shipley Town Centre. The Policy supports retail development of an appropriate scale as part of a new neighbourhood centre in the New Bolton Woods area. It also supports small scale shops as part of a larger scale residential development. With regards to the

Valley Road Retail Area, the Policy supports edge of centre expansion area of larger scale bulky goods.

Policy SCRC/SE5 – Shipley Town Centre and Primary Shopping Area

3.9.9 The Policy refers to Shipley’s defined town centre boundaries and PSA, which are displayed below in Figure 3.4.

Figure 3.4 – Shipley Town Centre and Primary Shopping Area



3.9.10 The Policy supports retail development proposals located within the PSA. Any retail development proposals within Shipley Town Centre but outside of the PSA will be assessed against Core Strategy Policy EC5. Proposals for main town centre uses within Shipley Town Centre will be assessed against Core Strategy Policy EC5.

3.9.11 The Policy continues and states that non-retail development within the PSA will be supported where they help to maintain or enhance the retail function of the PSA. changes of use from Use Class A1 will only be supported where proposals: make a positive contribution to the PSA and not harm its vitality and viability; not harmfully dominate existing retail frontages;

maintain active ground floor uses which encourage footfall into the PSA; and be of an appropriate scale to the role and function of the PSA.

Policy SCRC/SE6 – Market Provision

- 3.9.12 Shipley Market is identified as an important local feature which provides a focal point for the town (paragraph 4.4.40). The Policy supports the provision of new markets within Shipley Town Centre where they support the vitality, viability and diversity of the town centre. Any proposals to redevelop or improve the public realm of Market Square should seek to retain and enhance Shipley Market, in line with the Shipley Development Framework.

4.0 Health Checks of Defined Centres in Bradford District

4.1 Introduction

4.1.1 Comprehensive up-to-date monitoring of town centre performance is an important exercise that is required to identify the strengths and weaknesses of a centre, establish how its vitality and viability can be improved, and to effectively plan for the future of the centre.

4.1.2 A detailed and up-to-date assessment of the health of each of the defined city, town, district and local centres in Bradford District (commonly referred to as a 'health check') has been undertaken. The centres assessed are:

- Bradford City Centre;
- Town Centres – Keighley, Ilkley, Bingley and Shipley;
- District Centres – Five Lane Ends, Girdlington, Great Horton, Greengates, Thornbury, Tong Street and Odsal; and
- Local Centres – Addingham, Allerton, Baildon, Barkerend Road, Bolton Junction, Burley-in-Wharfedale, Carlisle Road/Whetley Hill, Clayton, Cottingley, Crossflatts, Cross Road (Keighley), Cullingworth, Denholme, Duckworth Lane, Eccleshill, Fell Lane/Oakworth Road (Keighley), Frizinghall, Harden, Haworth (Main Street), Haworth (Mill Hey), Heaton, Holme Wood, Horton Grange, Idle, Laisterdyke, Leeds Road, Lidget Green, Low Moor, Marshfields (Manchester Road), Menston, Oak Lane (Manningham), Oakworth, Princeville, Queensbury, Riddlesden, Saltaire, Silsden, Steeton with Eastburn, Sticker Lane, Thornton, Undercliffe, White Abbey Road, Wibsey, Wilsden, Wrose and Wyke.

4.1.3 A full, detailed assessment of the health of each of the defined city, town, district and local centres in Bradford District is provided in Volume 2 (Health Check Assessments) of this study, with supporting tables and plans set out at the appendices to Volume 2. This section sets out the key findings of the health check assessments for the principal centres in Bradford District, namely Bradford City Centre and each of the defined town centres. Note that the findings of the district and local centre health checks are not reproduced in this Volume 1 (Main Report) of the study.

4.1.4 Further to the health checks for the defined centres, assessments of the individual performance of the existing markets within Bradford District have also been undertaken. There are five Council owned markets located within Bradford District, comprising:

- Oastler Market, Bradford City Centre
- Kirkgate Market, Bradford City Centre;
- Keighley Market Hall, Keighley Town Centre;
- Shipley Open Market, Shipley Town Centre; and
- Bingley Open Market, Bingley Town Centre.

4.1.5 The performance assessments of the existing markets in Bradford District are detailed in Volume 2 of this study with a summary of the findings provided in this section.

4.1.6 Before the findings of the health check and market assessments are presented, it is important to set out the health check indicators for the assessments. Then the sub-regional retail context has been identified and considerations have been taken for the role and movement of Bradford's centres in the sub-regional shopping hierarchy as identified by Venuescore's 2016-2017 UK Shopping Venue Rankings.

4.2 Health Check Indicators

4.2.1 The criteria by which the health of a centre can be judged is set out in the Government's Ensuring the Vitality of Town Centres Planning Practice Guidance of July 2019. Indicators which should be monitored on a regular basis in order to judge the health of a centre and its performance over time include the following:

- **Diversity of uses** – Data on the diversity of uses in the centres was collated during the centre surveys undertaken between May and July 2019.
- **Proportion of vacant street level property** – Vacant properties were identified during the undertaking of the surveys.
- **Commercial yields on non-domestic property** – Information in relation to commercial yields was sourced from EGi where available.
- **Customers' views and behaviour** – Analysis of customers' views and behaviour collected as part of the household survey and on-street surveys in respect of Bradford City Centre, and Keighley, Bingley, Ilkley and Shipley Town Centres. The results of the household and on-street surveys are provided at Appendix 2 and 4, respectively.

- **Retailer representation and intentions to change representation** – Information on the performance of centres and the current strength of retailer representation has been derived from the surveys of the centres and Venuescore’s 2016-17 UK Shopping Venue Rankings.
- **Commercial rents** – Information in relation to rents was sourced from EGi where available.
- **Pedestrian flows** – General footfall and pedestrian flows were observed during the undertaking of the centre surveys.
- **Accessibility** – Consideration of access to and around each centre is informed by the site visits to each centre supplemented by desk-based research.
- **Perception of safety and occurrence of crime** – Consideration of safety measures within each centre has been informed by observations while undertaking site visits.
- **State of town centre environmental quality** – Consideration of the quality of the buildings and public realm in each of the centres has also been informed by observations when undertaking field work.
- **Balance of retailers** – The composition and balance between independent and national multiple retailers identified from the centre surveys.
- **Barriers** – Consideration of the extent to which there is evidence of barriers to new businesses opening and existing businesses expanding.
- **Opening hours** – Consideration of the availability and extent to which there is an evening and night time economy offer informed by observations while undertaking site visits and desk based research.

4.3 Sub-Regional Retail Context

4.3.1 Bradford District is located in West Yorkshire, which comprises of Bradford, Calderdale, Kirklees, Leeds and Wakefield districts. Bradford District borders Leeds to the East, Calderdale to the south and Kirklees to the southeast.

4.3.2 Bradford is located in the south east of the Bradford District and is the largest settlement in the district, and second largest in West Yorkshire behind Leeds. Bradford City Centre is the principal centre in the district and functions as its retail and leisure focus. Bradford contains several edge and out-of-centre retail and leisure destinations as summarised below:

- Forster Square Retail Park – Located adjacent to the north of Bradford City Centre off Valley Road, the retail park contains 24 units. Tenants in Forster Square are generally fashion, furniture or electrical goods retailers and include Argos, , Currys PC World, DFS, Dreams, Harveys, JD Sports, Next, Pets at Home, SCS, Sports Direct, TK Maxx and USC. Aldi and Farmfoods are located adjacent to Forster Square Retail Park.
- The Peel Centre, Bradford – Located adjacent to the north of Forster Square, the Peel centre comprises a Tesco superstore and Smyths Toy Superstore.
- Manningham Lane Retail Park – Also located adjacent to the north of Bradford City Centre at the junction of Manningham Lane and Drewton Road, the retail park includes a JD Gym, the Food Warehouse and Brantano.

4.3.3 Keighley Town Centre is located in the north west of the district and serves the second largest settlement in Bradford District along with a large rural hinterland. Keighley is at the farthest end of the “chain” of town centres along the A650, which links Bradford, Shipley, Bingley, and Keighley together. Several edge and out-of-centre retail and leisure destinations are located in Keighley as summarised below:

- Alston Retail Park – Located in the north of Keighley, Alston retail park contains several large units which have a focus on comparison retailing, namely furnishings and homeware. Retailers present include B&Q, Dunelm and Carpetright.
- Keighley Retail Park – Located off Hard Ings Road, Keighley Retail Park has more of a variety of comparison uses and contains major national retailers such as Currys PC World, TK Maxx, Halfords and Pets at Home. There is also two Leisure Service units on the retail Park (McDonalds and KFC).

4.3.4 Bingley Town Centre is located in between Keighley and Shipley and is roughly the halfway point along the A650 corridor. Bingley is only 6 km from Keighley Town Centre and 9 km from Bradford City Centre.

4.3.5 Ilkley Town Centre is located in the northern part of the district in a predominantly more rural setting than the other town centres due to being separated from the rest of the town centres by Rombalds Moor. Ilkley Town Centre is known both in the district and in the wider regional area as a tourist and day tripping destination.

4.3.6 Shipley Town Centre is located roughly in the centre of the district and forms part of the northern fringes of the Bradford urban area. This proximity means that Shipley Town Centre has a high degree of connectivity with, and subsequently a close relationship with, Bradford City Centre.

4.3.7 Leeds borders Bradford District to the east and Leeds City Centre provides a significant retail, leisure, cultural and commercial focus for the West Yorkshire sub-region. Other notable centres in the vicinity of the district include Huddersfield to the south, Halifax to the south west, Skipton to the north west and Harrogate to the north east.

4.4 Movement in the National Retail Rankings

4.4.1 Table 4.1 charts the movement of Bradford City Centre along with Keighley, Bingley, Ilkley and Shipley Town Centres in Venuescore, the UK shopping venue rankings produced by Javelin Group and compares it to the position in the Venuescore rankings of the principal competing centres within the sub-region. Also included in Table 4.1 are the Venuescore rankings of the defined district centres and retail parks in Bradford District, where assessed.

4.4.2 Venuescore's index ranks 3,295 retail venues within the UK (including city, town district and local centres, stand-alone malls, retail warehouse parks and factory outlet centres), based on the strength of their current retail and food and drink provision. Towns and major shopping centres are rated using a scoring system which takes account of the presence in each location of multiple retailers – including anchor stores, fashion operators and non-fashion multiples.

4.4.3 Venuescore further allocates each centre to a tier, reflecting its role and function. The eight tiers comprise (highest to lowest): 'major city', 'major regional', 'regional', 'sub-regional', 'major district', 'district', 'minor district' and 'local'.

4.4.4 Bradford is ranked 80th of all the 3,295 venues evaluated in Venuescore 2016-17. As would be expected, Bradford is the highest ranked centre in Bradford District. Between 2013 and 2016, Bradford has improved its position in the wider regional area, rising in rank by 42 places. In addition, Bradford's national comparison offer has improved in quality from a 'lower middle' market position in the 2013 rankings to a 'middle' market position in 2015 and 2016.

4.4.5 Over this same period, the ranks of the three other 'regional' tier destinations in West Yorkshire – Huddersfield, Wakefield and the White Rose Centre in Leeds – have all fallen.

4.4.6 Keighley is the second highest ranking centre in Bradford District in 200th place at 2016, and is the only one of the district's four town centres graded as a 'sub-regional' tier destination. Keighley has broadly maintained its position since 2013, which it ranked 203rd. Ilkley and Shipley are the next highest ranking of the district's town centres and are graded as 'district'

tier destinations. Ilkley, which ranked 666th in 2016, has fallen 134 places from 532nd in 2013. Shipley is ranked 754th at 2016 and has broadly maintained its position from 2013. Bingley was ranked the lowest out of the town centres in 2171st position at 2016 and is graded as a 'local' tier destination. Bingley was not included in the 2013-14 rankings. Keighley, Shipley and Bingley were graded at a 'lower middle' market position in the 2016 rankings, and Ilkley was graded as 'upper middle'.

- 4.4.7 Ingleby Road (Girlington) is the highest-ranking district centre in 1276th position at 2016, and has increasing its position by 46 places since 2013. Bradford Enterprise 5 (Five Lane Ends) ranked 1418 in 2016, having risen 380 places since 2013. Thornbury is ranked in 1481st at 2016, having fallen 218 places since 2013. Queensbury is the highest ranking local centre to be included in the rankings (2377th place), with Leeds Road (2566th place) and Lidget Green (3133th place) also assessed. None of the other district or local centres in Bradford District are included in the rankings.
- 4.4.8 It is emphasised that whilst the Venuescore rankings provide a useful indicator of a centre's position within the national hierarchy, Venuescore's methodology does not take account of many factors that contribute to the vitality and viability of a centre, such as independent businesses. As such, a degree of caution should be applied when considering the Venuescore rankings, which should be considered in conjunction with the other health check indicators provided in this report.

Table 4.1: Venuescore's Sub-Regional Shopping Hierarchy

Centre	Venuescore 2016-17			2015 Rank	2013 Rank	Change in Rank 2013 to 2016
	Location Grade	Market Position	2016 Rank			
Leeds	Major City	Upper Middle	3	4	4	+1
Huddersfield	Regional	Middle	68	70	65	-3
Bradford	Regional	Middle	80	55	122	+42
Wakefield	Regional	Lower Middle	80	79	62	-18
Leeds White Rose Centre	Regional	Middle	150	150	146	-4
Halifax	Sub-Regional	Lower Middle	192	196	201	+9
Keighley	Sub-Regional	Lower Middle	200	200	203	+3
Castleford Junc 32 Xscape	Sub-Regional	Upper Middle	246	250	275	+29
Castleford	Sub-Regional	-	368	343	365	-3
Birstall Shopping Park, Batley	Major District	Upper Middle	376	384	360	-16
Pontefract	Major District	Lower Middle	403	354	347	-56

Centre	Venuescore 2016-17			2015 Rank	2013 Rank	Change in Rank 2013 to 2016
	Location Grade	Market Position	2016 Rank			
Bradford Forster Square Retail Park	Major District	Middle	551	590	636	+85
Ilkley	District	Upper Middle	666	516	532	-134
ShIPLEY	District	Lower Middle	754	716	752	-2
Ingleby Road, Bradford	Minor District	Middle	1276	1151	1322	+46
Bradford Enterprise 5	Minor District	Lower Middle	1418	1486	1798	+380
Thornbury	Minor District	Lower Middle	1481	1486	1263	-218
Harrogate Road Retail Park, Bradford	Local	Lower Middle	1625	1618	1524	-101
Keighley Retail Park	Local	Lower Middle	1625	1789	2428	+803
Rooley Lane, Bradford	Local	Lower Middle	2021	2034	-	+13*
Bingley	Local	Lower Middle	2171	2193	-	+22*
Peel Centre, Bradford	Local	Middle	2171	2193	2061	-110
Great Horton	Local	Middle	2377	2193	2428	+51
Mayo Avenue Retail Park, Bradford	Local	Lower Middle	2377	2193	2061	-316
Queensbury	Local	Middle	2377	2193	2216	-161
Leeds Road, Ilkley	Local	Upper Middle	2566	-	-	-
Alston Retail Park, Keighley	Local	Lower Middle	2566	3152	-	586*
Buttershaw, Bradford	Local	Middle	2815	2827	-	12*
Great Horton Road, Bradford	Local	Middle	2815	2193	-	-622*
Lidget Green (Cemetery Road)	Local	-	3133	2827	-	-306*

Source: Venuescore 2016-2017/2015-16/2013-14 UK Shopping Venue Rankings (Javelin Group). Bradford Enterprise 5 is also known as Five Lane Ends District Centre. Ingleby Road is also known as Girdlington District Centre.
 * denotes the change between 2016 rank and 2015 rank.

4.5 Bradford City Centre Health Check Findings

4.5.1 The health check of Bradford City Centre is set out in full in Section 3 of Volume 2 (Health Check Assessments) of this study. Plans showing the city centre boundary and diversity of uses in the centre are provided at Appendix 1 of Volume 2.

- 4.5.2 The analysis and the diversity of uses show that Bradford is a key comparison and leisure destination in the District, with a large variety and range of goods / activities provided and a strong national retailer presence. The range and variety of leisure uses, particularly bars, public houses and night clubs, present in the centre indicate there is an active and strong evening and night time economy. It is important to note though that the evening economy is restricted to the southern end of the centre around Centenary Square, the Alhambra Theatre, Barry Street and Sunbridge Wells.
- 4.5.3 The centre is highly accessible by public, active and private transport, however it is recommended that the connectivity and links be strengthened between the two railway stations and that the Council explore measures to improve pedestrian connectivity to the east and south of the city centre.
- 4.5.4 The environmental quality of the city centre was found to be good, with a significant number of Listed Buildings and the Conservation Area giving a clear indication of the historic nature of the centre. There are issues of prominent buildings in the centre which do not wholly interact with the street scene and do have a negative impact on the environmental quality. A range of cosmetic measures should be explored to address these issues.
- 4.5.5 The majority of uses in the centre operate traditional opening hours of 9am-5/5.30pm, with exceptions being the retail units within the Broadway Centre (7pm most days and 8pm on Thursdays), restaurants throughout the centre opening later in the day (from 11.30am onwards) and remaining open until 10/10.30pm through the week and later on Fridays and Saturdays. Attractions and large leisure venues such as the Alhambra, St Georges Hall and the Light Cinema remain open into the evening.
- 4.5.6 In terms of potential barriers, whilst there is a significant stock of vacant units, their quality is somewhat poor which may detract new occupiers or existing one expanding. There are a number of units which are of a historic character and may not be particularly well suited to modern retailer needs. The number of retailers expressing their interest in premises in Bradford City Centre indicates there is a desire for retailers to locate in the city centre but there may not be adequate size, quality or conditioned premises to accommodate their requirements. The success of the Broadway Centre is a clear indication that modern and high-quality units are desired. Bradford's proximity to Leeds may also be a barrier to investment as national retailers may prefer to locate to larger retail and population hubs.
- 4.5.7 Bradford City Centre contains a significant number and proportion of national retailers, the largest in the district, and some of these national retailers have multiple premises in the

centre, this is more prevalent with leisure service and convenience uses. The remainder are predominantly local traders and some regional traders.

- 4.5.8 Centenary Square and City Park is of a high environmental quality and standard which can be utilised for a range of events, the presence of the large TV screen adds to the unique quality. Whilst it was not readily apparent from the survey, it is recommended that the screen be utilised for as wide a range of events as possible (live sports etc.) to attract users to the centre and link / advertise this with an expanded online presence.
- 4.5.9 It is considered that the regeneration schemes which are planned will be of great benefit to the city centre through both addressing areas of vacant units, updating existing assets and introducing significant numbers of residents to the city centre. Whilst it is important to recognise the ambition of these schemes, the Council should explore measures to address the high vacancy rates in general and in a more holistic manner than just targeting concentrations of vacant units.
- 4.5.10 Overall, Bradford City Centre is a strong performing centre but there are areas of improvement. The key issues for Bradford City Centre to be the following:
- The high vacancy rates are well above the national average and have not improved since the previous survey. Whilst the Council have ambitious regeneration schemes which are moving forwards, more needs to be done to tackle vacancy rates in general;
 - The ring road acts as a significant barrier for access to the city centre from the east and south;
 - Issues surrounding environmental quality of prominent, albeit a small number of, buildings in the centre and the condition of vacant units;
 - Notable perceptions of anti-social behaviour in the city centre;
 - Potential issue of regeneration schemes stalling or not coming to full fruition; and
 - Below average representation of financial and business services.

4.6 Town Centre Health Checks Findings

Keighley Town Centre

- 4.6.1 The health check of Keighley Town Centre is set out in full in Section 4 of Volume 2 (Health Check Assessments) of this study. Plans showing the town centre boundary and diversity of uses in the centre are provided at Appendix 2 of Volume 2.
- 4.6.2 Keighley has seen some reduction in floorspace, loss of major retailers and Venuescore points, it has experienced a small rise in Venuescore ranking and a reduction in the vacancy rate. As comparison units have become vacant they have successfully been occupied by independent businesses. Keighley is able to command a large catchment for the area north of Bradford, it is well connected by public transport and has ample cheap car parking. With two major supermarkets in the centre, an indoor market that remains popular despite not being in need of refurbishment, and a range of major national retailers in the Airedale Centre, it retains a significant appeal.
- 4.6.3 However, the situation is more fragile than an initial analysis may suggest, and without major interventions the Centre may experience a significant decline. The Airedale Centre is in need of investment (two large units are currently vacant and others may follow), its multi-storey car park is particularly unappealing, surrounding streets have a dated public realm and the Indoor Market Hall is in need of major refurbishment to bring it into the 21st century. Significant development sites remain vacant (notably Worth Valley Shopping Centre).
- 4.6.4 Keighley has the largest number of national retailers compared to any of the town centres, including 13 out of the top 28 comparison retailers, and is second only to Bradford in the District. It is noted that the number of national retailers has contracted overall from the previous study. Although the independent sector is strong, off-street indoor units are becoming vacant and a predominance of take-aways and other secondary uses can create a poor impression. The lack of a quality or family leisure offer remains a significant detriment that Keighley lacks in comparison to similar sized centres. A larger cinema, or a theatre, would help to anchor such uses.
- 4.6.5 The current leisure offer, comprising predominantly of take aways, bars and public houses, does indicate and support and evening economy, but there is a lack of restaurants. There is no provision for late night shopping in Keighley, other than at the large supermarkets. Leisure uses tend to remain open until the evening and into night.

- 4.6.6 Nevertheless, Keighley has a strong historic centre and has attractive areas of recent public realm improvements. With further public realm improvements, supporting new food and drink uses, Keighley has the potential to create an enhanced visitor experience. There is good digital connectivity and marketing and a current BID initiative. The ingredients are here for a continuing strong town centre, with the right actions and investments.
- 4.6.7 In conclusion, the period since the last retail study has seen Keighley hold up well against other centres although it is important to note that there are several issues which require addressing, such as:
- Whilst the Airedale centre contains a good number of national retailers, the building itself is in need of investment to ensure its
 - There is a limited restaurant presence in the centre and there could be benefits through encouraging more and high-quality vendors to the centre;
 - There is a large number of vacant units and sites in the centre, including large ones in the Airedale Centre. This does present opportunities to redevelop the centre; and
 - Issues around crime and anti-social behaviour need to be addressed.

Ilkley Town Centre

- 4.6.8 The health check of Ilkley Town Centre is set out in full in Section 4 of Volume 2 (Health Check Assessments) of this study. Plans showing the town centre boundary and diversity of uses in the centre are provided at Appendix 2 of Volume 2.
- 4.6.9 Ilkley Town Centre is strong and healthy town centre performing in accordance with its role as a market town and important service centre for the north of the district. It is an attractive centre, which benefits from a number of period and historic buildings, tree lined streets and landscaped public spaces.
- 4.6.10 Ilkley Town Centre benefits from the presence of several of the main foodstore operators, namely Tesco, Booths and M&S Foodhall, with the edge-of-centre Tesco and Booths stores in close enough proximity to the primary shopping area to facilitate linked trips with other town centre destinations. However, the centre has experienced a substantial loss of convenience outlets over the last decade, which has reduced the variety of the convenience offer in the centre. The centre also lacks representation from any discount foodstore operators. Local residents would therefore benefit from a greater variety of convenience operators from across the retail spectrum within Ilkley Town Centre to improve consumer choice.

- 4.6.11 The comparison retail provision in the centre is particularly strong. The offer is focused on upmarket fashion and home interiors retailing. The centre provides a strong independent offer alongside representation from numerous upmarket national multiple retailers, such as JoJo Maman Bébé, Joules, and Laura Ashley. The range of mainstream multiple comparison retailers, and particularly middle market clothing and fashion operators, is comparatively limited. However, the centre still provides a reasonably broad overall comparison retail offer, which is meeting most residents' comparison shopping needs.
- 4.6.12 Overall, across the retail classes, the national retailer presence in Ilkley is strong for a centre of this size, with the independent provision being very strong and offering a range of high-quality goods.
- 4.6.13 Ilkley Town Centre also provides a strong and varied service and leisure offer that includes a theatre and events venue, a cinema, two gyms, a rock climbing facility, and a range of restaurants, cafés, bars and pubs. The leisure offer in the centre has strengthened significantly since 2007. The strong restaurant and bar provision in Ilkley supports the existence of a vibrant evening economy. These uses tend to remain open until the late evening or into the night with the remainder of retail units opening under traditional operating times.
- 4.6.14 The historic nature of the centre, whilst promoting a good environmental quality, can act as a barrier to the development of retail units. historic units can be restrictive in terms of their ability to accommodate modern needs of retailers and the stock in Ilkley predominantly comprises of Victorian era buildings.
- 4.6.15 Vacancy in the centre is well below the UK average and vacant units are generally small in scale and concentrated in peripheral locations. Nevertheless, there is a notable concentration of four vacant units on Leeds Road near the junction with Little Lane, and vacancy in the centre has increased substantially over the last decade or so.
- 4.6.16 Published demand for units in Ilkley Town Centre is strong, with 10 retail and leisure operators interested in locating in the town. There is significant potential to attract further retail and leisure uses to the centre should suitable premises become available.
- 4.6.17 Overall, Ilkley is considered to be a strong and well performing centre which has a very strong independent trader presence and good provision of high-quality goods. The key issues for Ilkley are:
- The rural location means that car travel could be more preferential than other centres;

- Following from that the provision of parking is also an issue for the centre for private vehicles and coaches; and
- The lack choice and range of convenience retailers in the centre.

Bingley Town Centre

- 4.6.18 The health check of Bingley Town Centre is set out in full in Section 4 of Volume 2 (Health Check Assessments) of this study. Plans showing the town centre boundary and diversity of uses in the centre are provided at Appendix 2 of Volume 2.
- 4.6.19 The streets were clean and the proximity of public spaces and parklands positively impacts the centre. However further options could be explored to better connect the centre to the canal as this is a key asset for additional recreation and tourism opportunities.
- 4.6.20 In terms of the number and diversity of uses observed; convenience, retail services, leisure services and financial and business services were all observed to either be broadly in line with national averages or above the national average. Comparison uses were below the national average, which could be attributed to Bingley's positioning between the larger centres of Keighley and Shipley. Vacancy rates are also below the national average and have significantly improved since the previous survey.
- 4.6.21 Bingley has the smallest number of national retailers compared to the other town centres. This could be attributed to Bingley's peripheral location on the A650 corridor and its proximity to larger centres, which may also be considered as a barrier.
- 4.6.22 The majority of units in Bingley operate traditional opening times. Bingley's evening economy is quite strong with the Bingley Little Theatre acting as an anchor for the evening economy and supported by restaurants and public houses. The Little Theatre could potentially be used to progress further evening economy growth.
- 4.6.23 Despite its location on a main thoroughfare, there are ample opportunities for safe crossing and the pavements are large enough to accommodate pushchairs and wheelchairs. The centre is considered to be highly accessible by private vehicle and public transport however measure to improve active transport should be explored. Whilst there is a topographical constraint, coupled with the A650 and the canal present acting as barrier, some options should be explored to connect the eastern areas of Bingley to the centre.

4.6.24 Overall, Bingley is considered to be a healthy centre with a good environmental quality. Based on the survey, the following aspects are considered to be the key issues which require addressing:

- There is a lack of connectivity between the centre and some of the key assets, particularly the canal and the locks;
- There is a lack of national retailers compared to other town centres;
- Low rental prices which have been decreasing over time; and
- Bingley takes more of a service and convenience role, which is typically seen in Local and District Centres rather than Town Centres.

Shipley Town Centre

4.6.25 The health check of Shipley Town Centre is set out in full in Section 4 of Volume 2 (Health Check Assessments) of this study. Plans showing the town centre boundary and diversity of uses in the centre are provided at Appendix 2 of Volume 2.

4.6.26 The diversity of uses indicate that Shipley caters to a very broad range of goods and services. The range of comparison goods covered is broad and varied to cater to any needs. Users which may require more variety or more specialist needs are more likely to have these needs met in Bradford City Centre, the main retail and comparison hub for the district, which is in easy reach of the centre.

4.6.27 Shipley has a high degree of connectivity, being well located and connected on the strategic highways network, containing a train station in the centre and numerous bus stops. It is recommended that further measures be explored to improve the physical connectivity to the station with the centre.

4.6.28 Overall, whilst Shipley is considered to be a functional and healthy town centre, some critical refurbishment and investment programmes should be implemented to ameliorate the dated aesthetic of the centre's public realm and buildings. A masterplan-based approach to updating the centre may be a potential route for the Council to pursue.

4.6.29 Overall, Shipley maintains a relatively strong position in the district and has a relatively good health, however there are a number of issues which need addressing, such as:

- The public realm, which allows for a high volume of pedestrians and is user friendly, requires investment and updating;
- There is a higher than average level of vacant properties in the centre;

- The Underground Market is not well integrated with the centre, is difficult to locate and is in need of refurbishment;
- The area to the north of the canal and to the east of Otley Road, whilst falling within the defined town centre boundary, are disconnected from the main area as these features act as significant physical barriers; and
- Buildings in key areas, or prominent buildings, are in visible need of maintenance.

4.7 Market Performance Assessments Findings

4.7.1 There are a number of Council owned markets located within Bradford district, namely:

- Oastler Market, Oastler Shopping Centre, Bradford (177 stalls) – trades Monday to Saturday;
- Kirkgate Market, Kirkgate Shopping centre, Bradford (184 stalls) – trades Monday to Saturday;
- Keighley Market Hall, Low Street (85 stalls) – trades Monday to Saturday;
- Shipley Outdoor Market, Market Square (135 stalls) – trades on Monday, Friday and Saturday; and
- Bingley Outdoor Market, Town Square (108 stalls) – trades Friday and Saturday.

4.7.2 In addition, there are several markets in the district owned by independent operators, including Shipley Underground Market, Bradford Plaza adjacent to Thornbury district centre and Bradford Bazaar on Cemetery Road. At the time of the 2013 Study, a number of illegally trading (without planning permission or a market licence) Asian Bazaars were operating in out-of-centre locations. The Council have since taken a number of successful planning enforcement actions against these illegal markets and these have now ceased trading.

4.7.3 The performance assessments of the five Council owned markets in Bradford District are set out in full in Section 7 of Volume 2 (Health Check Assessments) of this study with the key findings provided below.

Kirkgate and Oastler Markets, Bradford City Centre

4.7.4 Kirkgate Market is located within Kirkgate Shopping Centre and is an indoor market encompassing 184 stalls and around 1,800 sq.m of retail sales area. Oastler Market is located within the Oastler Shopping Centre on John Street in the north of the city centre and

is also indoor. Oastler Market comprises 177 stalls with a retail sales area of around 2,400 sq.m alongside 23 external shops. Both markets are open Monday to Saturday.

- 4.7.5 The product offer at Kirkgate Market has traditionally focused on comparison goods and comprises mainly unbranded clothing, household items and homewares, alongside several large cafés. The product offer at Oastler Market is substantially different and focused on fresh and other convenience goods with an ancillary comparison goods offer.
- 4.7.6 A high and increasing level of vacancy and continued fall in footfall at the city centre markets over the last decade or so evidence the decline in the popularity of the markets and current oversupply of stalls. The Oastler Shopping Centre's former Morrisons store was an important generator of footfall and its closure in April 2016 has had a major impact on the number of shoppers that use the market.
- 4.7.7 Whilst the Oastler Centre is the larger of the two city centre markets and attracts a higher footfall, the in-street survey findings suggest that usage of the market by shoppers elsewhere in the city centre is particular low. A lack of offer and its location within the north of the city centre and therefore distance from the most popular parts of the city centre – specifically, Broadway Shopping Centre, Centenary Square and Kirkgate Shopping Centre – are driving its poor usage. The more central location of Kirkgate Market enables it attracts more shoppers from across other parts of the city centre. For Kirkgate Market, the lack of offer and poor quality were found to be the main deterrents of better usage.
- 4.7.8 Overall, it is evident that the performance of the city centre markets has continued to decline since the previous 2013 Study. Whilst the city centre markets are no longer under threat from illegally trading out-of-centre Asian Bazaars, vacancies are still increasing and visitor numbers are in decline.
- 4.7.9 The Council's proposed relocation of Oastler Market to a new market hall at Darley Street will provide a central location for the market and provide a modern and accessible market hall environment. The new market hall is expected to encompass the city centre markets' convenience offer, along with a dedicated food and drink outlet level, diversifying the available market offer. Existing non-food market provision at Oastler Market is proposed to be consolidated into the existing Kirkgate Market.
- 4.7.10 The proposed new Darley Street Market Hall is therefore expected to address many of the issues identified in relation to the existing Oastler Market and the survey findings indicate that shoppers in other parts of the city centre are more likely to shop in the proposed new food market. Whilst a combined convenience and comparison goods market is not proposed

as part of the scheme, which is considered would support market performance, it is expected that the proximity of the proposed new 'food-only' market hall and Kirkgate Shopping Centre, which provides easy access to the 'non-food' Kirkgate Market will serve to increase the number of visits to Kirkgate Market.

Keighley Market Hall, Keighley Town Centre

- 4.7.11 Keighley Market Hall is located on Low Street in Keighley Town Centre. The market encompasses 85 stalls and is open Monday to Saturday. The market offer comprises a mix of convenience and comparison stalls and several cafes.
- 4.7.12 A substantial increase in vacancy within the market since the 2013 Study indicates that there has been a decline in the performance of the market since the 2013 Study. Nevertheless, Keighley Market was performing exceptionally well at the time of the previous study. The market continues to attract a high level of regular use and customer views of the market remain overwhelmingly positive. Overall, these findings indicate that the Keighley market is still performing relatively well. However, since August 2019 a number of tenants have stated that they will not be renewing their lease agreements when they expire in March 2020, which will result in the vacancy rate increasing to 20% by April 2020, assuming that no more notices are received or stalls taken up by new traders.

Shipley Open Market, Shipley Town Centre

- 4.7.13 Shipley Open Market is an outdoor market that takes place at Market Square on Mondays, Fridays and Saturdays. The Monday market offers second-hand items and bric-a-brac, and the Friday and Saturday markets offer a wide selection of goods including fresh food.
- 4.7.14 Shipley Open Market has suffered from a high vacancy rate since 2008 and that vacancy has risen further in recent years. Whilst the in-street survey respondents that intended to visit the market tend to do so regularly, tellingly, over a third did not identify anything they liked anything about the market. Overall, these findings indicate that the market is continuing to struggle.

Bingley Open Market, Bingley Town Centre

- 4.7.15 The outdoor Bingley Open Market takes place in Town Square twice a week on Fridays and Saturdays, which hosts stalls selling fruit and vegetables, meats, bread and other produce. Bingley Open Market suffers from a high level of vacancy, which along with the poor usage of the market amongst town centre shoppers suggested by the in-centre surveys and loss of one of its trading days since 2013 indicates that the performance of the market is poor.

Bradford Retail and Leisure Study



5.0 Shopping Patterns in Bradford District

5.1 Introduction

- 5.1.1 A key requirement of the Study is the detailed understanding of shopping behaviour in respect of both convenience and comparison goods. To this end, The Council commissioned specialist market researchers NEMS to undertake a telephone survey of households to identify consumers' habits and preferences in the Study Area. The household survey enables identification of the market share claimed by specific retail destinations (that is, the number of trips to, or expenditure at, a particular destination as a proportion of the total number of trips, or total expenditure), the frequency of visits to purchase various types of goods, the incidence of linked trips, the most popular means of accessing town centre facilities, the use of other town centre facilities, and so on.
- 5.1.2 Undertaking the household survey enables an in-depth analysis of shopping behaviour at a local level and allows the evaluation of the retail turnover and trade draw of particular centres. The use of specifically commissioned and tailored survey research is fundamental to identifying the likely capacity for future retail floorspace across the Study Area. Notwithstanding this, the Council acknowledges that there can be limitations to survey research, particularly with regard to the sample size which can be achieved, and the results should therefore be taken to be a broad indication of consumer preferences.
- 5.1.3 The general methodological approach to the household survey along with the key results is set out below.

5.2 Study Area

- 5.2.1 A plan of the Study Area for the household survey is provided at Appendix 1, which is reproduced in Figure 5.1 below. The Study Area broadly covers Bradford District and surrounding areas that falls within the neighbouring local authority areas of Leeds, Kirklees, Calderdale, Craven and Harrogate.

Figure 5.1: Study Area



Source: Study Area Plan at Appendix 1.

5.2.2 The Study Area comprises 18 zones which are based on postcode sectors grouped together to reflect areas which are likely to exhibit similar patterns of shopping behaviour. The Study Area and zones correspond with those defined in the 2013 Study. The use of the same Study Area and zone boundaries allows the comparison of shopping patterns over time, which is helpful in considering whether the role and function of particular centres is changing. The zones are based on the following postcode sectors:

- Zone 1 - BD22 0, BD22 7, BD22 8 and BD22 9;
- Zone 2 - BD20 6, BD20 7, BD20 8 and BD22 6;

- Zone 3 - BD20 0, BD20 9, LS29 0, LS29 8 and LS29 9;
- Zone 4 - BD16 3, BD20 5, LS20 8, LS20 9, LS21 3, LS29 6 and LS29 7;
- Zone 5 - BD21 1, BD21 2, BD21 3, BD21 4 and BD21 5;
- Zone 6 - BD13 4, BD13 5, BD15 0, BD16 1, BD16 2 and BD16 4;
- Zone 7 - BD9 5, BD9 6, BD15 7, BD15 8, BD15 9 and BD18 4;
- Zone 8 - BD13 1, BD13 2, BD13 3 and BD14 6;
- Zone 9 - HX2 8, HX2 9, HX3 6 and HX3 7;
- Zone 10 - BD6 2, BD12 0, BD12 7, BD12 8, BD12 9, BD19 6, HD6 1, HD6 2, HD6 4 and HX3 8;
- Zone 11 - BD4 0, BD4 6, BD4 9, BD11 1, BD11 2 and LS28 8;
- Zone 12 - BD3 8, BD3 9, BD4 7 and BD4 8;
- Zone 13 - BD5 0, BD5 7, BD5 8, BD5 9, BD6 1, BD6 3, BD7 3 and BD7 4;
- Zone 14 - BD7 1, BD7 2, BD8 0, BD8 8, BD8 9, BD1 1, BD1 2, BD1 3, BD1 4, BD1 5 and BD8 7;
- Zone 15 - BD2 1, BD2 2, BD2 3, BD2 4, BD3 0 and BD3 7;
- Zone 16 - BD9 4, BD18 1, BD18 2 and BD18 3;
- Zone 17 - BD17 5, BD17 6, BD17 7 and LS19 7; and
- Zone 18 - BD10 0, BD10 8, BD10 9, LS19 6, LS28 5, LS28 6 and LS28 7.

5.3 Household Survey

- 5.3.1 A survey of 1,800 households was undertaken in March and April 2019, which asked respondents 49 questions relating to their retail and leisure habits. The household survey questions and full tabulation of the results from the household survey are provided at Appendix 2.
- 5.3.2 For convenience goods, respondents were questioned in respect of where they last visited and where they visited the time before last to undertake 'main' food shopping¹⁸ and 'top up' food shopping¹⁹. For comparison goods, respondents were questioned in respect of where they last visited to purchase eight separate categories of comparison goods ('clothing and footwear'; 'CDs, DVDs and books'; 'small household goods'; 'toys and recreational goods'; 'chemist goods'; 'electrical goods'; 'DIY and gardening goods' and 'furniture').

¹⁸ Which often takes the form of a 'trolley shop' and might be undertaken on a weekly basis.

¹⁹ Which often takes the form of a 'basket shop' involving the purchase of grocery staples, such as milk and bread, and is generally undertaken on a more frequent basis.

5.4 Assessment of Retail Shopping Patterns

- 5.4.1 The household telephone survey allows the assessment of the convenience and comparison goods shopping of residents across the Study Area. The household survey enables identification of the market share of trips claimed by specific retail destinations, which can then be applied to the total convenience and comparison expenditure of residents to provide an assessment of the current pattern of retail expenditure.
- 5.4.2 The assessment of the current pattern of retail expenditure is provided in Tables 1 to 10 at Appendix 3 for convenience goods and Tables 14 to 33 at Appendix 3 for comparison goods. An associated step-by-step explanation is provided below and further details are also provided in Section 6 and in the notes accompanying the tables at Appendix 3.

Population

- 5.4.3 Population projections for each of the Study Area zones at the base year of 2019 are as set out in Table 1 at Appendix 3. Population projections for each of the Study Area zones at the 2019 base year were sourced from Experian Micromarketer G3 2017 data (which was issued in December 2018). The population within the Study Area at the 2019 base year amounts to a total of 724,355 persons. Further details on the population projections for the Study Area over the study period are provided at Section 6.2.

Expenditure

- 5.4.4 Per capita expenditure on convenience and comparison goods for each of the Study Area zones at 2017 (the most recent estimates available) was also sourced from Experian Micromarketer G3 data as set out in Tables 2 and 17 at Appendix 3.
- 5.4.5 The 2017 per capita expenditure data was then rolled forward to the 2019 base year using the retail expenditure growth forecasts provided by Experian in Retail Planner Briefing Note 16, which was published in December 2018. A deduction was also made from the expenditure per capita on convenience and comparison goods to take account of the proportion of expenditure spent through special forms of trading (i.e. expenditure that does not take place in shops, namely internet, catalogue or mail order shopping). The deduction for special forms of trading is based on the 2019 estimates for non-store retail sales (adjusted for sales from stores) provided by Experian in Retail Planner Briefing Note 16, of 4.0% for convenience retail sales and 17.9% for comparison retail sales. Further details on the expenditure growth forecasts and deductions for SFT are set out in Section 6.3.

- 5.4.6 The total expenditure per person within each zone at 2019 is derived from the product of the population of each zone (as set out in Table 1 at Appendix 3) and the per capita expenditure on convenience goods and each of the eight categories of comparison goods at 2019 (as set out in Table 2 at Appendix 3 for convenience goods and Table 14 at Appendix 3 for comparison goods).
- 5.4.7 The total convenience goods expenditure by the residents of each zone is set out in Table 3 at Appendix 3. The total convenience goods expenditure at 2019 by the residents of each zone is then split between main and top-up food shopping in Table 4 at Appendix 3 based on residents' average weekly spend on main and top-up food shopping as determined from the household survey. The Study Area residents' convenience goods expenditure in the 2019 base year amounts to a total of £1,338.1m, of which £1,104.3m (82.5%) of the total is spent on main-food shopping and £233.8m (17.5%) is spent on top-up food shopping.
- 5.4.8 The total comparison goods expenditure by the residents of each zone along with the total spending in each of the eight categories of comparison goods is set out in Table 15 at Appendix 3. In total, approximately £1,962.6m of comparison goods expenditure is available to residents of the Study Area in the 2019 base year of which:
- £544.9m (27.8%) is spent on clothing and footwear goods;
 - £84.7m (4.3%) is spent on books, CDs, DVDs and stationery;
 - £181.6m (9.3%) is spent on small household goods (e.g. home furnishings, glass and china items);
 - £276.0m (14.1%) is spent on recreational goods (such as games, toys, hobby goods, sports equipment, musical instruments and bicycles);
 - £313.0m (15.9%) is spent on health and beauty products or chemist goods;
 - £236.1m (12.0%) is spent on electrical goods (such as televisions, computers and other IT equipment, washing machines, kettles and other household appliances);
 - £109.8m (5.6%) is spent on DIY and gardening goods; and
 - £216.5m (11.0%) is spent on furniture, carpets and other floor coverings.

Pattern of Retail Expenditure

- 5.4.9 For convenience goods, the total main and top-up expenditure by the residents of each zone (Table 4 at Appendix 3) is then applied to the percentage shopping patterns identified from the household survey (Tables 5 and 6 at Appendix 3) to estimate the pattern of main and top-up convenience goods spending by the Study Area residents (Tables 7 and 8 at Appendix

3). Table 9 at Appendix 3 sums the spending on main and top-up shopping to provide an overall pattern of convenience goods spending in monetary terms, as well as in percentage terms (Table 10 at Appendix 3).

5.4.10 For comparison goods, the total expenditure by the residents of each zone on each of the eight categories of comparison goods (Table 15 at Appendix 3) is applied to the percentage shopping patterns identified for the associated category of comparison goods from the household survey (Tables 16, 18, 20, 22, 24, 26, 28 and 30 at Appendix 3) to estimate the pattern of spending by the Study Area residents for each category of comparison goods (Tables 17, 19, 21, 23, 25, 27, 29 and 31 at Appendix 3). Table 32 at Appendix 3 sums the spending across the eight categories of comparison goods shopping to provide an overall pattern of comparison goods spending in monetary terms, as well as in percentage terms (Table 33 at Appendix 3).

5.4.11 It is emphasised that the assessment of current shopping patterns relates to the Study Area residents and commentary relates to tangible retail destinations only. In other words, expenditure which is committed through the internet and other special forms of trading does not form part of the market share element of the commentary that follows.

5.5 Convenience Goods Shopping Patterns

Main Destinations for Convenience Goods Expenditure

5.5.1 Table 5.1 below sets out the Study Area residents' main convenience destinations both within and outside of Bradford District in terms of convenience goods expenditure. Table 5.1 demonstrates that the most popular destinations for convenience goods expenditure within Bradford District are:

- Asda in Shipley Town Centre, which attracts £57.5m or 4.3% of the Study Area residents' total convenience goods expenditure;
- Morrisons in Girdlington District Centre, which attracts £54.0m or 4.0%;
- Morrisons in Keighley Town Centre, which attracts £50.4m or 3.8%;
- Sainsbury's in Keighley Town Centre, which attracts £48.7m or 3.6%;
- Asda at Bingley Street in Keighley, which attracts £48.3m or 3.6%;
- Morrisons in Five Lane Ends District Centre, which attracts £45.3m or 3.4%;
- Morrisons at Mayo Avenue, Bradford, which attracts £43.3m or 3.2%;

- Tesco Extra at Great Horton Road, Great Horton, which attracts £43.0m or 3.2%;
- Morrisons in Thornbury District Centre, which attracts £42.6m or 3.2%; and
- Asda at Cemetery Road in Lidget Green, which attracts £42.4m or 3.2%.

Table 5.1: Study Area Residents' Main Destinations for Convenience Goods Expenditure

Destinations	Zone	2019 Expenditure	2019 Market Share	2012 Market Share
		£m	%	%
INSIDE STUDY AREA				
BRADFORD DISTRICT				
Bradford City Centre				
Destinations in Bradford City Centre	14	9.8	0.7	3.3
Sub Total Bradford City Centre	-	9.8	0.7	3.3
Keighley Town Centre				
Morrisons, Worth Way, Keighley Town Centre	5	50.4	3.8	5.2
Sainsbury's, Cavendish Street, Keighley Town Centre	5	48.7	3.6	3.4
Aldi, Gresley Road, Keighley Town Centre	5	22.4	1.7	1.0
Other Destinations in Keighley Town Centre	5	4.5	0.3	0.6
Sub Total Keighley Town Centre	-	126.0	9.4	10.2
Ilkley Town Centre				
Tesco Superstore, Springs Lane, Ilkley Town Centre	3	9.6	0.7	1.7
Booths, Leeds Road, Ilkley Town Centre	3	6.3	0.5	0.6
Other Destinations in Ilkley Town Centre	3	6.0	0.4	0.5
Sub Total Ilkley Town Centre	-	21.8	1.6	2.8
Bingley Town Centre				
Aldi, Dubb Lane, Bingley Town Centre	6	22.5	1.7	-
Other Destinations in Bingley Town Centre	6	4.5	0.3	0.9
Sub Total Bingley Town Centre	-	27.0	2.0	0.9
Shipley Town Centre				
Asda, Manor Lane, Shipley Town Centre	16	57.5	4.3	5.6
Aldi, Tony Miller Approach, Briggate, Shipley Town Centre	16	13.9	1.0	1.3
Other Destinations in Shipley Town Centre	16	4.4	0.3	0.3
Sub Total Shipley Town Centre	-	75.9	5.7	7.2
Five Lane Ends District Centre				
Morrisons, Bradford Road, Five Lane Ends District Centre	18	45.3	3.4	5.8
Other Destinations in Five Lane Ends District Centre	18	0.0	0.0	0.1
Sub Total Five Lane Ends District Centre	-	45.3	3.4	5.9
Girlington District Centre				
Morrisons, Victoria Shopping Centre, Girlington District Centre	14	54.0	4.0	5.1
Other Destinations in Girlington District Centre	14	4.7	0.4	0.3
Sub Total Girlington District Centre	-	58.7	4.4	5.4
Great Horton District Centre				
Other Destinations in Great Horton District Centre	13	1.8	0.1	0.1
Sub Total Great Horton District Centre	-	1.8	0.1	0.1

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Destinations	Zone	2019 Expenditure	2019 Market Share	2012 Market Share
		£m	%	%
Greengates District Centre				
Sainsbury's, Harrogate Road, Greengates District Centre	18	18.5	1.4	2.4
Other Destinations in Greengates District Centre	18	6.2	0.5	0.3
Sub Total Greengates District Centre	-	24.6	1.8	2.6
Thornbury District Centre				
Morrisons, Rushton Avenue, Thornbury District Centre	15	42.6	3.2	4.0
Other Destinations in Thornbury District Centre	15	3.5	0.3	0.3
Sub Total Thornbury District Centre	-	46.0	3.4	4.3
Tong Street District Centre				
Destinations in Tong Street District Centre	11	3.8	0.3	0.3
Sub Total Tong Street District Centre	-	3.8	0.3	0.3
Local Centres				
Asda, Town Gate, Wyke Local Centre	10	7.9	0.6	1.3
Lidl, Barkerend Road, Barkerend Road Local Centre	12	7.2	0.5	0.2
Co-op, Northgate, Baildon Local Centre	17	9.2	0.7	0.5
Aldi, Idlecroft Road, Idle Local Centre	18	12.5	0.9	-
Other Destinations in Local Centres	-	40.0	3.0	4.8
Sub Total Local Centres Total	-	76.7	5.7	6.8
Sub Total Bradford City, Town, District and Local Centres		517.4	38.6	49.9
Elsewhere in Bradford District				
Asda, Bingley Street, Keighley	5	48.3	3.6	4.1
Morrisons, Mayo Avenue, Bradford	13	43.3	3.2	5.4
Tesco Extra, Great Horton Road, Great Horton	13	43.0	3.2	4.3
Asda, Cemetery Road, Lidget Green, Bradford	14	42.4	3.2	-
Asda, Rooley Lane, Bierley, Bradford	12	33.9	2.5	4.3
Aldi, Keighley Road, Silsden	3	25.8	1.9	-
Aldi, Clayton Road, Lidget Green, Bradford	14	24.4	1.8	-
Tesco Superstore, Halifax Road, Buttershaw, Bradford	10	23.7	1.8	1.6
Aldi, Allerton Road, Allerton	7	22.4	1.7	-
Tesco Superstore, Bradford Peel Centre, Valley Road, Bradford	14	20.3	1.5	1.8
Aldi, Valley Road (opp. Forster Square Retail Park), Bradford	14	14.0	1.0	0.5
Tesco Superstore, Brighouse Road, Queensbury	8	12.6	0.9	1.3
Asda, Canterbury Avenue, Little Horton, Bradford	13	5.5	0.4	0.4
Other Destinations Elsewhere in Bradford District	-	50.3	3.8	3.6
Sub Total Elsewhere in Bradford District	-	410.0	30.6	27.3
Sub Total Bradford District		927.5	69.3	77.3
OUTSIDE BRADFORD DISTRICT				
Morrisons, Otley Road, Guiseley		48.2	3.6	3.9
Aldi, Bradford Road, Guiseley	4	25.3	1.9	-
M&S Foodhall, Guiseley Retail Park, Park Road, Guiseley	4	5.0	0.4	0.4
Waitrose, Westgate, Otley	4	14.0	1.0	0.7
Lidl, Carr House Road, Shelf	4	17.6	1.3	0.2
Lidl, Haley Hill, Halifax	9	11.8	0.9	-

Destinations	Zone	2019 Expenditure	2019 Market Share	2012 Market Share
		£m	%	%
Morrisons, Keighley Road, Ilkley, Halifax	9	12.5	0.9	2.1
Lidl, Wakefield Road, Brighouse	9	11.6	0.9	-
Sainsbury's Superstore, Mill Lane, Brighouse	10	10.1	0.8	0.3
Tesco Superstore, Huddersfield Road, Brighouse	10	27.3	2.0	0.9
Morrisons, High Street, Yeadon	10	12.9	1.0	1.2
Asda, Owlcotes Shopping Centre, Varley Street, Pudsey	17	54.2	4.0	1.7
Other Destinations Outside Bradford District	18	39.5	2.9	2.2
Sub Total Outside Bradford District	-	289.9	21.7	13.6
Sub Total Inside Study Area	-	1,217.4	91.0	90.9
OUTSIDE STUDY AREA				
Sainsbury's Superstore, Wade Street, Halifax	-	17.86	1.3	0.8
Morrisons, Broughton Road, Skipton	-	9.46	0.7	1.1
Aldi, Branch Road, Batley	-	5.05	0.4	-
Tesco Superstore, Northgate, Cleckheaton	-	10.43	0.8	0.4
Aldi, Stanningley Road, Bramley, Leeds	-	7.7	0.6	-
Morrisons, Swinnow Road, Bramley, Leeds	-	5.5	0.4	0.3
Asda, Howley Park Road, Morley	-	5.3	0.4	0.6
Other Destinations Outside Study Area	-	59.44	4.4	5.9
SUB TOTAL OUTSIDE STUDY AREA	-	120.7	9.0	9.1
TOTAL	-	1,338.1	100.0	100.0

Source: Tables 9 and 10 at Appendix 3. Main destinations defined as individual foodstores that attract more than £5m of residents' convenience goods expenditure. 2012 market shares derived by WYG from Table 4 at Appendix 7 of the 2013 Study

- 5.5.2 Table 5.1 highlights the limited role of Bradford City Centre in meeting convenience shopping needs. None of the main destinations for convenience goods expenditure are located in Bradford City Centre, reflecting the lack of a large supermarket or superstore in the city centre. Destinations in Bradford City Centre collectively attract just £9.8m of residents' convenience retail expenditure, equating to a market share of 0.7%. The role of Bradford City Centre as a convenience shopping destination has declined since 2012, when the centre attracted a market share of 3.3%, reflecting the closure of Morrisons at Westgate in April 2016.
- 5.5.3 The dominance of out-of-centre foodstores in the Bradford urban area is evident. Looking at destinations within Zone 12, 13, 14 and 15 which cover the city centre and central parts of the Bradford urban area, it can be seen that there are eleven principal foodstores within these zones. Of these, three are located in defined centres – Morrisons in Gillingham District Centre, Morrisons in Thornbury District Centre and Lidl in Barkerend Local Centre – and attract a total of £103.7m of residents' convenience expenditure. One – Tesco Extra in Great Horton – is in an edge-of-centre location. The remaining seven principal foodstores in these zones – Morrisons at Mayo Avenue, Asda at Cemetery Road in Lidget Green, Asda at Rooley

Lane in Bierley, Aldi at Clayton Road, Tesco at Valley Road, Aldi at Valley Road and Asda at Canterbury Avenue in Little Horton – are all out-of-centre stores that collectively attract £183.9m of residents' convenience goods expenditure.

- 5.5.4 In contrast, Table 5.1 highlights the important role of Keighley Town Centre as a convenience shopping destination. Key destinations are Morrisons at Worth Way, Sainsbury's at Cavendish Street and Aldi at Gresley Road. Overall, Keighley Town Centre attracts a total of £126.0m of the Study Area residents' convenience goods expenditure, equating to a market share of 9.4%. The edge-of-centre Asda at Bingley Street in Keighley further attracts £48.3m of Study Area residents' convenience goods expenditure, equating to a market share of 3.6%. Keighley Town Centre's market share of Study Area residents' convenience goods spending has decreased by 0.8 percentage points from 10.2% in 2012, which is likely to be due to the opening of new stores in the surrounding area, most notably Aldi in Bingley Town Centre and Aldi in Silsden, reflecting the growth of discount operators seen nationwide. Principal foodstore destinations in the rural areas surrounding Keighley are limited, indicating that Keighley functions as a hub for convenience shopping for a wide surrounding rural catchment.
- 5.5.5 Shipley Town Centre is also an important destination for convenience goods spending, attracting a total of £75.9m of residents' expenditure, equating to a market share of 5.7%. Key destinations are Asda at Manor Lane and Aldi at Tony Miller Approach. Shipley Town Centre's market share of Study Area residents' convenience goods spending has notably decreased by 1.5 percentage points since 2012, when the centre attracted a market share of 7.2%. This is likely to be attributable to the opening of several new stores in the surrounding area since 2012, including Aldi at Allerton Road in Allerton, Aldi at Clayton Road in Lidget Green, Asda at Cemetery Road in Lidget Green, and Aldi in Idle Local Centre. Again, the shift in spending from Shipley Town Centre to the mostly new Aldi stores in the surrounding area reflects the growth of discount operators seen nationwide.
- 5.5.6 Bingley and Ilkley Town Centres serve a more modest convenience shopping role compared to Keighley and Shipley. Bingley Town Centre attracts a total of £27.0m of convenience expenditure, equating to a market share of 2.0%. Bingley Town Centre's market share has increased by 1.1 percentage points from 0.9% in 2012, largely reflecting the opening of the Aldi at Dubb Lane in October 2015. A new Lidl store opened in Bingley Town Centre in May 2019 following the completion of the household survey, which is likely to have further boosted Bingley Town Centre's market share of convenience goods expenditure. Bingley Town Centre is the only one of Bradford District's principal centres to have benefitted from

the rising popularity of the discounters, with two new discount operators opening in the centre since 2015.

- 5.5.7 Ilkley Town Centre attracts a £21.8m of residents' convenience expenditure, equating to a market share of 1.6%, which is the lowest of all of Bradford District's four town centres. The main destinations in Ilkley Town Centre are Tesco at Springs Lane and Booths at Leeds Road, although both of these stores are relatively modest in size and attract less than £10m of residents' convenience expenditure. Ilkley Town Centre's market share of convenience expenditure has decreased by 1.2 percentage points since 2012, when the centre attracted a market share of 2.8%. This decrease is likely due to the opening of new stores in the surrounding area, most notably Aldi at Keighley Road in Silsden and Aldi at Bradford Road in Guiseley. Again, growth of the discounters and new store openings outside of Ilkley have contributed to a reduction in convenience spending in Ilkley Town Centre, reflecting the national fall in the market share of the 'big four' foodstore operators.
- 5.5.8 Girdlington, Thornbury, Five Lane Ends and Greengates District Centres also perform important convenience shopping roles, attracting totals of £58.7m, £46.0m, £45.3m and £24.6m (or 4.4%, 3.4%, 3.4% and 1.8%) of residents' convenience expenditure, respectively. These four district centres all encompass a large supermarket operated by one of the 'Big 4' operators (Tesco, Asda, Sainsbury's and Morrisons). The market shares of Girdlington, Thornbury, Five Lane Ends and Greengates District Centres have all decreased since 2012, from 5.4%, 4.3%, 5.9% and 2.6% respectively. This decrease again can be attributed to the opening of several new stores in the surrounding areas, most notably Aldi at Clayton Road in Lidget Green, Asda at Cemetery Road in Lidget Green, and Aldi in Idle Local Centre.
- 5.5.9 Tong Street and Great Horton District Centres attract a limited share of residents' convenience goods expenditure, totalling £3.8m and £1.8m, respectively (or 0.3% and 0.1%). The convenience provision in both of these centres is relatively small scale. Tong Street District Centre contains two small supermarkets operated by Farmfoods and Iceland. There are no large supermarkets operated by one of the top national multiple foodstore operators located within Great Horton District Centre, although an edge-of-centre Tesco is located adjacent to the centre boundary.
- 5.5.10 The convenience goods provision within the local centres is predominantly small scale and only four of the main convenience goods destinations are located within a local centre, namely, Aldi in Idle, Co-op in Baildon, Asda in Wyke and Lidl in Bakerend Local Centres. All of these supermarkets are relatively modest in scale in keeping with the local role of their

respective centres. It is notable that the overall market share of residents' convenience expenditure spent in the local centres has decreased by 1.1 percentage points from 6.8% in 2012 to 5.7% in 2019.

- 5.5.11 Overall, destinations within the defined city, town, district and local centres in Bradford District attract 38.7% of residents' convenience goods expenditure. This overall market share of the defined centres has decreased substantially by 11.2 percentage points since 2012, when the defined centres attracted a total of 49.9% of residents' convenience goods expenditure.
- 5.5.12 Table 5.1 indicates that this shift is in part due to a shift in spending to the several new supermarkets that have opened in Bradford District since 2012 in locations outside of the defined centres – Asda at Cemetery Road in Lidget Green, and Aldi stores in Silsden, Lidget Green and Allerton. Spending at destinations elsewhere in Bradford District (i.e. outside of the defined centres) has collectively increased by 3.3 percentage points from 27.3% in 2012 to 30.6% in 2019. It is noted, however, that the new Aldi in Allerton is located adjacent to the Allerton Local Centre boundary and was recommended for inclusion within the boundary by WYG in the 2013 Study.
- 5.5.13 However, the decrease in the convenience goods market share of the defined centres principally reflects a shift in spending to destinations outside of the Bradford District. Table 5.1 shows that the overall convenience goods market share of destinations in Bradford District has declined by 8.0 percentage points from 77.3% in 2012 to 69.3% in 2019. The retention of convenience goods spending in Bradford District is considered in detail later in this section.

Main Destinations for Convenience Goods Expenditure by Zone

- 5.5.14 Table 5.2 below sets out the principal destinations for convenience shopping expenditure on a zonal basis.

Table 5.2: Study Area Residents' Main Destinations for Convenience Goods Expenditure by Zone

Zone	Main Destinations	Location of Store
1	<p>Morrisons, Worth Way, Keighley Town Centre (25.0%)</p> <p>Aldi, Gresley Road, Keighley Town Centre (19.5%)</p> <p>Sainsbury's, Cavendish Street, Keighley Town Centre (18.4%)</p> <p>Asda, Bingley Street, Keighley (12.0%)</p>	<p>Zone 5</p> <p>Zone 5</p> <p>Zone 5</p> <p>Zone 5</p>

Zone	Main Destinations	Location of Store
2	Sainsbury's, Cavendish Street, Keighley Town Centre (21.1%) Asda, Bingley Street, Keighley (18.8%) Aldi, Gresley Road, Keighley Town Centre (10.8%) Aldi, Keighley Road, Silsden (10.8%) Morrisons, Worth Way, Keighley Town Centre (9.9%)	Zone 5 Zone 5 Zone 5 Zone 3 Zone 5
3	Aldi, Keighley Road, Silsden (25.7%) Tesco, Springs Lane, Ilkley Town Centre (11.5%) Booths, Leeds Road, Ilkley Town Centre (7.1%)	Zone 3 Zone 3 Zone 3
4	Morrisons, Otley Road, Guiseley (30.4%) Aldi, Bradford Road, Guiseley (16.5%) Waitrose, Westgate, Otley (11.4%) Sainsbury's, Cavendish Street, Keighley Town Centre (7.6%)	Zone 4 Zone 4 Zone 4 Zone 5
5	Asda, Bingley Street, Keighley (32.1%) Morrisons, Worth Way, Keighley Town Centre (29.9%) Sainsbury's, Cavendish Street, Keighley Town Centre (14.9%) Aldi, Gresley Road, Keighley Town Centre (12.1%)	Zone 5 Zone 5 Zone 5 Zone 5
6	Aldi, Dubb Lane, Bingley Town Centre (24.1%) Morrisons, Worth Way, Keighley Town Centre (13.4%) Sainsbury's, Cavendish Street, Keighley Town Centre (11.7%) Asda, Bingley Street, Keighley (10.0%) Asda, Manor Lane, Shipley Town Centre (8.6%)	Zone 6 Zone 5 Zone 5 Zone 5 Zone 16
7	Asda, Manor Lane, Shipley Town Centre (18.6%) Aldi, Allerton Road, Allerton (16.5%) Asda, Cemetery Road, Lidget Green, Bradford (13.6%) Morrisons, Victoria Shopping Centre, Girdlington District Centre (12.8%)	Zone 16 Zone 7 Zone 14 Zone 14
8	Aldi, Clayton Road, Bradford (19.4%) Morrisons, Victoria Shopping Centre, Girdlington District Centre (15.3%) Tesco, Brighouse Road, Queensbury (13.4%) Tesco Extra, Great Horton Road, Great Horton (11.3%)	Zone 14 Zone 14 Zone 8 Zone 13
9	Sainsbury's, Wade Street, Halifax (19.2%) Morrisons, Keighley Road, Illingworth, Halifax (13.6%) Tesco, Halifax Road, Buttershaw, Bradford (10.8%) Lidl, Carr House Road, Shelf (10.4%) Lidl, Haley Hill, Halifax (7.2%)	OSA Zone 9 Zone 10 Zone 9 Zone 9
10	Tesco Superstore, Huddersfield Road, Brighouse (21.5%) Lidl, Wakefield Road, Brighouse (9.3%) Morrisons, Mayo Avenue District Centre (8.6%) Tesco Superstore, Northgate, Cleckheaton (8.4%) Sainsbury's, Mill Lane, Brighouse (7.8%)	Zone 10 Zone 10 Zone 13 OSA Zone 10
11	Asda, Rooley Lane, Bierley, Bradford (21.0%) Asda, Owlcotes Shopping Centre, Varley Street, Pudsey (14.3%) Morrisons, Rushton Avenue, Thornbury District Centre (7.7%)	Zone 12 Zone 18 Zone 15
12	Morrisons, Rushton Avenue, Thornbury District Centre (37.4%) Asda, Rooley Lane, Bierley, Bradford (17.3%) Asda, Owlcotes Shopping Centre, Varley Street, Pudsey (8.3%)	Zone 15 Zone 12 Zone 18

Zone	Main Destinations	Location of Store
13	Tesco Extra, Great Horton Road, Great Horton (19.6%) Morrisons, Mayo Avenue (18.6%) Tesco, Halifax Road, Buttershaw, Bradford (7.6%) Asda, Cemetery Road, Lidget Green, Bradford (7.4%)	Zone 13 Zone 13 Zone 10 Zone 14
14	Morrisons, Victoria Shopping Centre, Girdlington District Centre (24.6%) Asda, Cemetery Road, Lidget Green, Bradford (18.4%) Tesco Extra, Great Horton Road, Great Horton (8.3%)	Zone 14 Zone 14 Zone 13
15	Morrisons, Bradford Road, Five Lane Ends District Centre (17.3%) Morrisons, Rushton Avenue, Thornbury District Centre (15.5%) Tesco Superstore, Bradford Peel Centre, Valley Road, Bradford (9.1%)	Zone 18 Zone 15 Zone 14
16	Asda, Manor Lane, Shipley Town Centre (39.3%) Morrisons, Bradford Road, Five Lane Ends District Centre (13.9%)	Zone 16 Zone 18
17	Morrisons, Otley Road, Guiseley (19.8%) Asda, Manor Lane, Shipley Town Centre (18.6%) Co-op, Northgate, Baildon Local Centre (13.8%) Aldi, Tony Miller Approach, Briggate, Shipley Town Centre (8.8%) Morrisons, High Street, Yeadon (8.8%) Aldi, Bradford Road, Guiseley (8.6%)	Zone 4 Zone 16 Zone 17 Zone 16 Zone 17 Zone 4
18	Asda, Owlcotes Shopping Centre, Varley Street, Pudsey (28.1%) Morrisons, Bradford Road, Five Lane Ends District Centre (14.8%) Sainsbury's, Harrogate Road, Greengates District Centre (7.7%)	Zone 18 Zone 18 Zone 18

Source: Table 10 at Appendix 3. For the purposes of this table the main convenience shopping destinations in each zone is defined as those achieving a market share in that zone of 7% or greater. Destinations that achieve a market share in that zone of 20% or greater in **bold**.

- 5.5.15 The most popular food shopping destinations for the residents of Zone 1 are Morrisons, Aldi and Sainsbury's stores in Keighley Town Centre, and the Asda at Bingley Road also in Keighley. All of these stores are located within neighbouring Zone 5. Residents of Zone 2 similarly travel to the destinations in Keighley in neighbouring Zone 5 for their convenience shopping (namely Sainsbury's, Aldi and Morrisons in the town centre, and the Asda at Bingley Road) as well as the Aldi store in Silsden in neighbouring Zone 3. This pattern reflects that Zones 1 and 2 encompass mostly rural areas with no large scale foodstore provision, which is considered appropriate given that Zones 1 and 2 contain several local centres, but no district or town centres.
- 5.5.16 In Zone 3, the most popular foodstore is the Aldi in Silsden, followed by the Tesco and Booths stores in Ilkley Town Centre. These three stores are all located within the zone.
- 5.5.17 The most popular foodstores for residents of Zone 4 are the Morrisons, Aldi and Waitrose stores in Guiseley in Zone 4, along with the Sainsbury's in Keighley Town Centre in neighbouring Zone 5.

- 5.5.18 For residents of Zone 5, the most popular food shopping destinations are Asda at Bingley Road in Keighley, and Morrisons, Sainsbury's and Aldi in Keighley Town Centre, all of which are located within the zone.
- 5.5.19 The most popular foodstore for the residents of Zone 6 is Aldi in Bingley Town Centre, which is the only foodstore in the zone with a floorspace of over 1,000 sq.m net and that functions as a main food shopping destination. Many residents in Zone 6 therefore travel to large foodstores in the surrounding area for their food shopping. The next three most popular stores for convenience food shopping are all in Keighley in neighbouring Zone 5 (Morrisons and Sainsbury's in Keighley Town Centre and Asda at Bingley Street). Asda in Shipley Town Centre in Zone 16 is also a popular convenience shopping destination for Zone 6 residents. This pattern reflects the relatively modest scale of the foodstore provision within Bingley Town Centre and across Zone 6. It is noted, that a new Lidl store opened in Bingley Town Centre in May 2019 after the completion of the household survey, which is expected to provide an additional main food shopping destination in Bingley Town Centre.
- 5.5.20 For the residents of Zone 7, the most popular destination for convenience shopping is Asda in Shipley Town Centre in neighbouring Zone 16, followed by Aldi in Allerton in Zone 7. Foodstores in neighbouring Zone 14 – Asda in Lidget Green and Morrisons in Gillington District Centre – are also popular destinations for Zone 7 residents. This pattern reflects that Zones 7 encompasses no defined district or larger centres and only one of the main foodstores, which is adjacent to Allerton Local Centre.
- 5.5.21 For residents in Zone 8, there are similarly no district or larger centres and only one modest sized supermarket located within the zone – Tesco in Queensbury – which is the third most popular destination for residents' convenience shopping. Three of the four most popular foodstores are located in neighbouring Zones 13 and 14.
- 5.5.22 Residents in Zone 9, which covers part of Calderdale immediately to the south of Bradford District, primarily look to destinations in Halifax and Shelf for their convenience shopping. Sainsbury's in Halifax outside of the Study Area is the most popular destination for Zone 9 residents. A further three of the most popular destinations are located within Zone 9 – Morrisons in Illingworth, Lidl in Shelf and Lidl in Halifax. Only one of the five most popular destinations – Tesco in Buttershaw – is located in Bradford District.
- 5.5.23 For residents in Zone 10, three of the five most popular convenience shopping destinations are located within Brighouse in Zone 10. Residents also travel to Morrisons in Mayo Avenue in neighbouring Zone 13, and to Tesco in Cleckheaton outside the Study Area. Similarly in

Zone 9, residents primarily look to destinations outside of Bradford District for their convenience goods shopping.

- 5.5.24 The most popular food shopping destinations for the residents Zone 11 are all located just outside of Zone 11 in neighbouring Zones 12, 18 and 15 (Asda in Bierley, Asda at the Owlcotes Centre in Pudsey and Morrisons in Thornbury District Centre, respectively). Whilst Tong Street District Centre is located within the zone, foodstore provision in the centre is somewhat limited, with the two largest foodstores – Iceland and Farmfoods – both relatively small scale and frozen food specialists.
- 5.5.25 For the residents Zone 12, the most popular food shopping destination by far is Morrisons in Thornbury District Centre, which is located just outside of Zone 12 in Zone 15. Asda in Bierley, which is located within the zone, is also a popular destination followed by Asda at the Owlcotes Shopping Centre in Pudsey in Zone 18.
- 5.5.26 For residents of Zone 13, the two most popular food shopping destinations – Tesco Extra in Great Horton and Morrison in Mayo Avenue – are both located within the zone. Tesco Extra in Great Horton in neighbouring Zone 13 is also a main destination for convenience shopping.
- 5.5.27 For residents of Zone 14, the most popular food shopping destinations are Morrisons in Gillington District Centre and Asda in Lidget Green, which are both located within the zone. Tesco Extra in Great Horton in neighbouring Zone 13 is also a main destination for convenience shopping.
- 5.5.28 The most popular foodstores for residents of Zone 15 are Morrisons in Five Lane Ends District Centre, which is located just outside of the zone in neighbouring Zone 18, and Morrisons in Thornbury District Centre within the zone. Tesco at Bradford Peel Centre in neighbouring Zone 14 is also a popular destination.
- 5.5.29 For residents of Zone 16, the most popular food shopping destination by far is Asda in Shipley Town Centre, which is located within the zone. The only other main destination for convenience shopping is Morrisons in Five Lane Ends District Centre in neighbouring Zone 18.
- 5.5.30 There are six different main destinations for convenience shopping for the residents of Zone 17, which is likely to reflect that this zone stretches from Baildon to Yeadon, encompassing two distinct settlements with distinct shopping patterns. Three of the six main destinations are located in Baildon and neighbouring Shipley Town Centre in Zone 16 (Asda in Shipley,

Co-op in Baildon and Aldi in Shipley). The remaining three of the six main destinations are located in Yeadon and neighbouring Guiseley in Zone 4 (Morrisons in Yeadon and Morrisons and Aldi in Guiseley).

- 5.5.31 For residents of Zone 18, the most popular food shopping destinations are Asda in Pudsey, Morrisons in Five Lane Ends District Centre and Sainsbury's in Greengates District Centre, all of which are located within the zone.
- 5.5.32 Overall, it is evident that residents in Bradford District are generally well served by the existing foodstore provision in the district and nearby surrounding area. Residents do not generally need to travel far to access a choice range of main foodstore destinations.

Convenience Goods Expenditure Retention

- 5.5.33 Table 5.3 below provides the overall proportion of convenience expenditure spent at destinations located within Bradford District, the proportion of expenditure spent at destinations located within the Study Area but outside of Bradford District and the proportion spent outside of the Study Area. The 2019 figures are compared below with the corresponding figures at 2012 from the 2013 Study.

Table 5.3: Convenience Goods Expenditure Retention and Leakage

Destinations	2019		2012	
	Study Area Residents' Expenditure	Market Share	Study Area Residents' Expenditure	Market Share
	£m	%	£m	%
Inside Study Area				
All Destinations Inside Bradford District	927.5	69.3	928.2	77.3
All Destinations Outside Bradford District	289.9	21.7	163.6	13.6
All Destinations Inside Study Area	1,217.4	91.0	1,091.8	90.9
Outside Study Area				
All Destinations Outside Study Area	120.7	9.0	109.2	9.1
Total	1,338.1	100.0	1,201.1	100.0

Notes: Sourced from Tables 9 and 10 at Appendix 3, and 2013 Study (Table 4). Study Area residents' expenditure sourced from Table 4 of the 2013 Study converted from 2011 prices to 2017 prices based on the price indices provided in Appendix 4b of Retail Planner Briefing Note 16.

- 5.5.34 Tables 5.3 shows that in total, £1,217.4m of the available £1,338.1m of convenience expenditure generated by residents in the Study Area is spent at destinations within the Study Area. This equates to 91.0% of the available expenditure, which is referred to as the 'retention rate'. The remaining 9.0% of the Study Area residents' convenience goods expenditure is spent in destinations outside of the Study Area and is referred to as 'leakage'.

- 5.5.35 This is a high rate of convenience goods expenditure retention and indicates that the convenience goods facilities in the Study Area are meeting the needs of its residents. Convenience goods shopping patterns tend to be relatively localised as residents generally seek to source such goods close to home. Nevertheless, a small amount of convenience goods expenditure leakage to destinations beyond the Study Area is to be expected as some residents will inevitably undertake convenience shopping whilst travelling beyond the Study Area for work or other purposes. At 2012, the convenience goods expenditure retention rate was 90.9%, indicating that the market share retained by destinations in the Study Area has remained static since 2012.
- 5.5.36 However, it can be seen from Table 5.3 that within the Study Area there has been a notable shift in spending from destinations within Bradford District to destinations outside of Bradford District. A total of £927.5m of the available £1,338.1m of convenience expenditure generated by residents in the Study Area is spent at destinations within Bradford District, equating to 69.3% of the available expenditure. However, at 2012, the corresponding market share was 77.3%, indicating that the market share retained by destinations in Bradford District has reduced by 8.0 percentage points, or 10.3%. Conversely, the market share of destinations outside of Bradford District (but within the Study Area) has increased from 13.6% at 2012 to 21.7% at 2019.
- 5.5.37 Table 5.1 earlier in this section reveals that this shift is in part attributable to the rising popularity of the discounters Aldi and Lidl along with the development of several new Aldi and Lidl stores within the Study Area just outside of Bradford District. Key destinations which have had an impact on the market share of Bradford District include the Aldi at Bradford Road in Guiseley which opened in 2017, Lidl on Wakefield Road in Brighouse which also opened in 2017. The Lidl at Carr House Road in Shelf, which is located immediately outside of Bradford District has also seen a substantial increase in its market share since 2012. However, an increase in the popularity of Asda at the Owlcotes Shopping Centre in Pudsey, as well as the Tesco and Sainsbury's stores in Brighouse have also contributed to this shift.
- 5.5.38 However, it is notable that residents' total convenience goods expenditure has increased from £1,201.1m in 2012 to £1,338.1m in 2017 as shown in Table 5.3. The rise in total expenditure over this period has in monetary terms effectively offset the impact of the percentage shift in spending from destinations within Bradford District to destinations outside of Bradford District, masking any impacts of this shift on the ground. Residents overall spending at destinations in Bradford District of £927.5m therefore remains broadly the same as the £928.2m spent at 2012.

5.5.39 In analysing convenience goods expenditure within the Study Area, it is useful to look at the proportion of convenience expenditure from each zone which is spent at convenience destinations located within Bradford District. Table 5.4 below provides the zonal breakdown of spending in Bradford District from each zone.

Table 5.4: Bradford District Market Share of Expenditure at 2019 – Convenience Goods

Zone	Total Convenience Expenditure £m	Spending in Study Area £m	Bradford District Market Share 2019 %	Bradford District Market Share 2012 %
1	47.8	45.4	95.0	90.0
2	55.9	47.4	84.8	76.8
3	69.8	54.2	77.7	78.2
4	99.3	28.1	28.3	52.3
5	45.2	44.5	98.3	97.3
6	66.0	60.3	91.5	94.2
7	64.8	61.8	95.4	94.5
8	57.1	52.2	91.4	83.4
9	70.0	16.2	23.1	26.7
10	110.0	35.2	32.0	68.2
11	74.0	32.4	43.8	49.4
12	44.4	39.9	89.9	93.7
13	117.4	105.8	90.1	98.9
14	96.9	92.5	95.5	98.9
15	81.7	76.9	94.0	94.8
16	49.7	48.1	96.7	96.4
17	66.5	35.0	52.6	56.6
18	121.8	51.8	42.5	70.0
Total	1,338.1	927.5	69.3	77.3

Notes: Sourced from Tables 2a and 4b at Appendix 3

5.5.40 Table 5.4 shows that Bradford District’s convenience shopping market share is high for Zones 1, 2, 5 to 8, and 12 to 16, with over 85% of residents’ convenience goods expenditure spent at destinations within Bradford District. For Zones 1, 5, 7, 14 and 16, the proportion is above 95%. Bradford District’s market share for Zone 3 is a more modest 77.7%, as many residents in this zone travel to destinations outside of Bradford District, in Skipton, Guiseley and Otley, for their convenience goods shopping due to the large and primarily rural nature of this zone.

5.5.41 For Zones 4, 9, 10, 11, 17 and 18, the proportion is below 55%, demonstrating that over 45% of the residents’ expenditure is spent at destinations located outside of Bradford District

in these zones. Zones 4, 10, 11, 17 and 18 all of these zones encompass parts of neighbouring authority areas as well as parts of Bradford District, and Zone 9 encompasses an area wholly outside of Bradford District. It is therefore unsurprising that Bradford District's market share is low in these zones due to the presence of stores in neighbouring authorities within these zones and their proximity to destinations outside of Bradford District.

- 5.5.42 Nevertheless, Table 5.4 reveals that Bradford District's market share in Zones 4, 10 and 18 has declined substantially since 2012, dropping by 23.9, 36.2 and 27.5 percentage points, respectively.
- 5.5.43 In Zone 4, the opening of Aldi in Guiseley in 2017 accounts for much of this shift, but several existing stores in Guiseley and Otley have also seen a rise in their market share, most notably the Waitrose in Otley. In Zone 10, the opening of Lidl in Brighouse also in 2017 accounts for part of the shift, but again, existing stores outside of Bradford District have also seen a rise in their market share, most notably the Tesco in Brighouse and Tesco in Cleckheaton. In Zone 18, a rise in the market share of Asda at the Owlcotes Shopping Centre in Pudsey accounts for much of the shift, with the opening of Lidl at Town Street in Stanningley also contributing.

5.6 Comparison Goods Shopping Patterns

Main Destinations for Comparison Goods Expenditure in Bradford District

- 5.6.1 Turning to comparison goods shopping patterns, Table 5.5 below sets out the main destinations for comparison shopping for all residents within the Study Area, looking at destinations located within and outside of the Study Area. Table 5.5 demonstrates that Bradford City Centre is the principal comparison destination for residents of the Study Area, attracting 17.6% of the available comparison expenditure within the Study Area. This proportion has decreased since 2012, when the proportion of available expenditure spent in Bradford City Centre was 21.0%, demonstrating a decrease in market share by -3.4 percentage points or -16.2% of residents' comparison goods spending in the city centre compared to seven years ago. Looking back to 2007, the proportion of available expenditure spent in Bradford City Centre was 26.0%²⁰. Bradford City Centre's market share has therefore fallen by -5.0 percentage points since 2007.
- 5.6.2 In monetary terms, Bradford City Centre attracts a total of £345.5m of the available comparison expenditure generated by residents in the Study Area. In 2012, Bradford City

²⁰ Derived from Table 24a at Appendix 10 of the 2008 Bradford Retail and Leisure Study.

Centre attracted £319.9m (in 2017 prices) of comparison goods spending from residents of the Study Area²¹. Spending in Bradford City Centre has increased therefore increased by £25.6m, or 8.0% since 2012 due to a rise in Study Area residents' total comparison spending over this period. In 2007, Bradford City Centre attracted £391.2m (in 2017 prices) of comparison goods spending from residents of the Study Area²². Spending in Bradford City Centre in monetary terms has therefore fallen by –£45.7m, or –11.6%, since 2007 despite the rise in Study Area residents' total comparison spending over this period due to the fall in Bradford City Centre's market share.

5.6.3 Keighley Town Centre, Forster Square Retail Park in Bradford and Leeds City Centre are also major destinations for the Study Area residents' comparison goods spending.

5.6.4 Keighley Town Centre attracts £144.7m of the available comparison goods expenditure, equating to a market share of 7.4%. Similarly to Bradford City Centre, Keighley Town Centre's market share has decreased from 11.0% in 2012, although in monetary terms, comparison goods spending in Keighley Town Centre has also decreased since 2012, when the centre attracted £167.0m (in 2017 prices) of comparison goods spending from residents of the Study Area²³.

5.6.5 Forster Square Retail Park attracts £141.9m of residents' comparison goods spending, equating to a market share of 7.2%. This proportion remains broadly the same as at 2012, when the proportion of available expenditure spent at Forster Square Retail Park was 7.5%.

5.6.6 Leeds City Centre attracts £141.0m of Study Area residents' comparisons retail expenditure, equating to a market share of 7.2%. Leeds City Centre's market share has also decreased since 2012, when it attracted 8.1% of Study Area resident's comparison goods spending.

5.6.7 Other popular destinations for residents' comparison goods spending include:

- Halifax Town Centre (£62.7m or 3.2%);
- Owlcotes Shopping Centre in Pudsey (£55.4m or 2.8%);
- Birstall Shopping Park/Junction 27 Retail Park (£53.1m or 2.7%) and the adjacent IKEA stores Retail Park (£31.4m or 1.6%);

²¹ Adjusted from the £426.3m in 2005 prices sourced from Table 24a at Appendix 10 of the 2008 Bradford Retail and Leisure Study using the prices indices at Appendix 4b of Experian's Retail Planner Briefing Note 16.

²² Adjusted from the £426.3m in 2005 prices sourced from Table 24a at Appendix 10 of the 2008 Bradford Retail and Leisure Study using the prices indices at Appendix 4b of Experian's Retail Planner Briefing Note 16.

²³ Adjusted from the £316.4m in 2011 prices sourced from the 2013 Study, Table 22 at Appendix 7 using the prices indices at Appendix 4b of Experian's Retail Planner Briefing Note 16.

- Shipley Town Centre (£52.1m or 2.7%);
- Westside Retail Park, Leeds Road, Guiseley (£44.6m or 2.3%)
- Guiseley Retail Park, Park Road, Guiseley (£43.4m or 2.2%)
- White Rose Shopping Centre, Leeds (£44.2m or 2.3%)
- Ilkley Town Centre (£43.7m or 2.2%);

5.6.8 The market shares of Halifax Town Centre, Ilkley Town Centre and Shipley Town Centre have all declined since 2012. Indeed, Bingley Town Centre is the only one of Bradford District's four town centres that has seen its market share rise over this period. In contrast, the most popular out of centre destinations have largely experienced an increase in their market share since 2012, with the proportion of spending at Owlcotes Shopping Centre in Pudsey, Birstall Shopping Park/Junction 27 Retail Park/IKEA in Birstall collectively, and Westside Retail Park in Guiseley all rising since 2012.

5.6.9 This shift is most likely due to the national trend for the diversification in the types of retailers represented in out-of-centre locations. As many traditional out-of-centre bulky goods retailers have struggled or failed since 2010 in the wake of the 2007/2008 financial crisis, retail park floorspace has been taken up by a wider range of retailers, including foodstores and traditional high street retailers. Many remaining operators have also sought to reduce their floorspace whilst maintaining sales and turnover, freeing up floorspace for additional operators.

5.6.10 This trend is evident at several of the main out-of-centre destinations within the Study Area including the Owlcotes Shopping Centre in Pudsey, Westside Retail Park in Guiseley and Alston Retail Park in Keighley, which have all seen a notable increase in their market share since 2012. B&M opened at the Owlcotes Shopping Centre in 2018, taking up space previously in use as part of a larger M&S. Significant changes at Westside Retail Park include an increasing focus on homewares and clothing following the closure of Focus, Comet and Dreams at the retail park since 2012, and the introduction of Asda Living in 2012, Sports Direct in 2014 and Homesense in 2017. Following the merger of Currys and PC World in 2014, a combined Currys and PC World store now operates from Currys existing unit. At Alston Retail Park in Keighley, Dunelm took over the former AMF Bowling unit in 2014, which was vacant in 2012, and Home Bargains has replaced Netto. These changes have significantly diversified the retail offer at the Owlcotes Centre, Westside Retail Park, and Alston Retail Park, and increased their appeal as comparison retail destinations.

5.6.11 These types of incremental changes to the use of out-of-centre units along with the incremental expansion of existing units, have proved difficult for Local Planning Authorities to resist through the key retail planning policy tests set out in the national planning policy framework. However, it is important to highlight that the cumulative impacts of small scale and incremental out-of-centre development on city and town centres can be significant.

Table 5.5: Main Destinations for Comparison Goods Expenditure within Bradford District

Destinations	Zone	2019 Expenditure	2019 Market Share	2012 Market Share
		£m	%	%
INSIDE STUDY AREA				
BRADFORD DISTRICT				
Bradford City, Town, District and Local Centres				
Bradford City Centre	14	345.5	17.6	21.0
Keighley Town Centre	5	144.7	7.4	11.0
Ilkley Town Centre	3	43.7	2.2	2.3
Bingley Town Centre	6	20.1	1.0	0.7
Shipley Town Centre	16	52.1	2.7	3.4
Five Lane Ends District Centre	18	10.5	0.5	0.7
Girlington District Centre	14	16.0	0.8	0.6
Great Horton District Centre	13	2.7	0.1	0.4
Greengates District Centre	18	21.5	1.1	1.2
Thornbury District Centre	15	25.5	1.3	1.0
Tong Street District Centre	11	6.1	0.3	0.1
Local Centres	-	86.0	4.4	-
Sub Total Bradford City, Town, District and Local Centres		774.4	39.5	-
Elsewhere in Bradford District				
Asda, Bingley Street, Keighley	5	13.6	0.7	-
Alston Retail Park, Keighley	5	36.6	1.9	0.9
Keighley Retail Park, Hard Ings Road, Keighley	5	31.5	1.6	1.4
B&Q, Mountleigh Close, Euroway Trading Estate, Bradford	11	10.6	0.5	-
Asda, Rooley Lane, Bierley, Bradford	12	10.0	0.5	0.6
Tesco Extra, Great Horton Road, Bradford	13	16.4	0.8	0.6
Forster Square Retail Park, Valley Road, Bradford	14	141.9	7.2	7.5
Other Destinations Elsewhere in Bradford District	-	100.6	5.1	-
Sub Total Elsewhere in Bradford District	-	361.3	18.4	-
Sub Total Bradford District	-	1,135.7	57.9	59.5
OUTSIDE BRADFORD DISTRICT				
Guiseley Retail Park, Park Road, Guiseley	4	43.4	2.2	-
Westside Retail Park, Leeds Road, Guiseley	4	44.6	2.3	1.1
Guiseley Town Centre	4	34.9	1.8	2.1
Otley Town Centre	4	10.8	0.5	0.7
Brighouse Town Centre	10	22.5	1.1	0.5
Owlcotes Shopping Centre, Pudsey	18	55.4	2.8	1.8
Pudsey Town Centre	18	21.1	1.1	1.6
Other Destinations Outside Bradford District	-	38.1	1.9	1.2

Destinations	Zone	2019 Expenditure	2019 Market Share	2012 Market Share
		£m	%	%
Sub Total Outside Bradford District	-	270.8	13.8	9.0
Sub Total Inside Study Area	-	1,406.4	71.7	68.5
OUTSIDE STUDY AREA				
Halifax Town Centre	-	62.7	3.2	5.3
Charlestown Road Retail Park, Halifax	-	11.5	0.6	0.1
Skipton Town Centre	-	20.5	1.0	1.2
Birstall Shopping Park/Junction 27 Retail Park	-	53.1	2.7	3.7
IKEA Leeds, Birstall	-	31.4	1.6	0.1
White Rose Shopping Centre, Leeds	-	44.2	2.3	3.0
Leeds City Centre	-	141.0	7.2	8.1
Boundary Mill, Vivary Way, Colne	-	12.4	0.6	0.6
Other Destinations Outside Study Area	-	179.5	9.1	9.4
SUB TOTAL OUTSIDE STUDY AREA	-	556.2	28.3	31.5
TOTAL	-	1,962.6	100.0	100.0

Source: Table 32 at Appendix 3, and Table 22a at Appendix 7 of the 2013 Study.

Main Destinations for Comparison Goods Expenditure by Zone

5.6.12 Table 5.6 below sets out the principal destinations for comparison shopping expenditure on a zonal basis.

Table 5.6: Study Area Residents' Main Destinations for Comparison Goods Expenditure by Zone

Zone	Main Destinations	Location of Store
1	Keighley Town Centre (43.1%)	Zone 5
2	Keighley Town Centre (33.0%) Skipton Town Centre (11.6%) Leeds City Centre (11.6%)	Zone 5 OSA OSA
3	Ilkley Town Centre (19.7%) Keighley Town Centre (17.7%)	Zone 3 Zone 5
4	Leeds City Centre (14.2%) Westside Retail Park, Guiseley (13.7%) Guiseley Town Centre (12.9%) Guiseley Retail Park (11.7%)	OSA Zone 4 Zone 4 Zone 4
5	Keighley Town Centre (51.7%)	Zone 5
6	Keighley Town Centre (16.1%) Bingley Town Centre (14.9%) Leeds City Centre (11.3%) Bradford City Centre (10.1%)	Zone 5 Zone 6 OSA Zone 14
7	Bradford City Centre (28.7%) Forster Square Retail Park, Bradford (18.6%)	Zone 14 Zone 14

Zone	Main Destinations	Location of Store
8	Bradford City Centre (20.4%) Halifax Town Centre (11.5%)	Zone 14 OSA
9	Halifax Town Centre (33.2%)	OSA
10	Brighouse Town Centre (12.7%) Birstall Shopping Park/Junction 27 Retail Park/IKEA, Birstall (12.4%)	Zone 10 OSA
11	Birstall Shopping Park/Junction 27 Retail Park/IKEA, Birstall (16.4%) Bradford City Centre (14.6%) Leeds City Centre (10.3%)	OSA Zone 14 OSA
12	Bradford City Centre (33.8%) Forster Square Retail Park, Bradford (17.2%) Thornbury District Centre (10.2%)	Zone 14 Zone 14 Zone 15
13	Bradford City Centre (43.8%) Forster Square Retail Park, Bradford (11.3%)	Zone 14 Zone 14
14	Bradford City Centre (54.1%) Forster Square Retail Park, Bradford (17.3%)	Zone 14 Zone 14
15	Bradford City Centre (34.2%) Forster Square Retail Park, Bradford (16.7%)	Zone 14 Zone 14
16	Bradford City Centre (26.9%) Shipley Town Centre (24.8%) Forster Square Retail Park, Bradford (15.9%)	Zone 14 Zone 16 Zone 14
17	Shipley Town Centre (13.1%) Westside Retail Park, Guiseley (10.1%)	Zone 16 Zone 4
18	Owlcotes Shopping Centre, Pudsey (14.4%) Leeds City Centre (11.4%)	Zone 18 OSA

Source: Table 33 at Appendix 3. For the purposes of this table the main comparison shopping destinations in each zone is defined as those achieving a market share in that zone of 10% or greater. Dominant destinations are defined as those that achieve a market share in that zone of 20% or greater and are shown in **bold**.

5.6.13 Table 5.6 reveals that:

- Bradford City Centre is the dominant destination for Zones 7, 8 and 12 to 16, attracting a market share of 20% of greater in each of these zones. Bradford City Centre is also a main destination for Zones 6 and 11.
- Keighley Town Centre is the dominant destination for Zones 1, 2 and 5, and is also a main destination for Zones 3 and 6.
- Ilkley, Bingley and Shipley Town Centres are main destinations only in their own zones (Zones 3, 6 and 16, respectively). Ilkley and Bingley Town Centres each attract a market share of less than 20% in their own zones, and neither are therefore dominant destinations in their zones. Shipley Town Centre is one of two dominant destinations in its own zone, along with Bradford City Centre.
- Ilkley Town Centre is the most popular destination in its own zone. Bingley and

ShIPLEY Town Centres are the second most popular destinations in their own zones, after Keighley Town Centre and Bradford City Centre, respectively.

- Forster Square Retail Park in Bradford is a main destination for Zones 7 and 12 to 16.
- Leeds City Centre is a main destination for Zones 2, 4, 6, 11 and 18.
- All of main destinations for Zones 4, 9, 10 and 18 are outside of Bradford District. For Zone 11, two of the three main destinations are also outside of Bradford District.
- Zones 1, 5 and 9 have one dominant destination (Keighley Town Centre for Zones 1 and 5 and Halifax Town Centre for Zone 9) and no other main destinations.
- There are three or more main destinations for Zones 2, 4, 6, 11, 12 and 16. There are no dominant destination that attract a market share of 20% or more for Zones 3, 4, 6, 10, 11, 17 and 18. This indicates that the shopping patterns of residents in these ten zones (Zones 2 to 4, 6, 10 to 12 and 16 to 18) are dispersed with residents shopping at numerous different destinations.

5.6.14 The wider appeal of Bradford City Centre is therefore somewhat limited, with the centre attracting only a relatively limited market share from residents in the north of the district and near the Bradford District boundary to the east and south. Instead, the most popular comparison shopping destinations for residents here are Keighley Town Centre, as well as Ilkley and Bingley Town Centres albeit to a lesser extent, and the largest centres and out-of-centre retail destinations located outside of but close to Bradford District, most notably Leeds City Centre, Guiseley's retail parks, the Owlcotes Centre in Pudsey, Halifax town centre, Birstall Shopping Park/Junction 27 Retail Park/Ikea in Birstall.

Comparison Goods Expenditure Retention within the Study Area

5.6.15 Table 5.7 below summarises the comparison goods expenditure retention and leakage, as was demonstrated for convenience expenditure above. Table 5.7 demonstrates that the proportion of comparison expenditure from residents in the Study Area spent at destinations within the Study Area is 71.7%, or £1,406.4m of the available £1,962.6m of comparison expenditure. The equivalent figure from the 2012 Retail Study equated to 68.5% of the available expenditure from the Study Area residents. This indicates that the level of expenditure retained within the Study Area has increased by 3.2 percentage points, or 4.6%, which is a positive sign of the attraction of destinations within the Study Area compared to at 2012. As a result, the level of expenditure leaking outside of the Study Area has reduced since 2012 from 31.5% to 28.3%.

Table 5.7: Comparison Goods Expenditure Retention and Leakage

Destinations	2019		2012	
	Study Area Residents' Expenditure	Market Share	Study Area Residents' Expenditure	Market Share
	£m	%	£m	%
Inside Study Area				
All Destinations Inside Bradford District	1,135.7	57.9	909.6	59.5
All Destinations Outside Bradford District	270.8	13.8	137.2	9.0
All Destinations Inside Study Area	1,406.4	71.7	1,043.8	68.5
Outside Study Area				
All Destinations Outside Study Area	556.2	28.3	479.1	31.5
Total	1,962.6	100.0	1,522.9	100.0

Source: Tables 25a and 25b at Appendix 7, and the 2013 Study.

- 5.6.16 Table 5.7 further shows that some 57.9% (£1,135.7m) of the Study Area residents' total expenditure on comparison goods is spent in destinations in Bradford District, with 13.8% (£270.8m) spent at destinations in the Study Area but outside of Bradford District.
- 5.6.17 The proportion of Study Area residents' total expenditure on comparison goods spent at destinations within Bradford District has decreased by 1.6 percentage points since 2012, from 59.5% to 57.9%. Conversely, the proportion of expenditure retained by destinations in the Study Area but outside of Bradford District, has increased since 2012, from 9.0% to 13.8%. The increase in the retention of comparison goods expenditure within the Study Area compared to at 2012 is therefore due to an increase in the attractiveness of destinations outside of Bradford District (but within the Study Area) rather than destinations in Bradford District.
- 5.6.18 This shift corresponds to the findings in relation to the main comparison goods shopping destinations within the Study Area. Within Bradford District, the principal shopping destinations of Bradford City Centre, Keighley Town Centre and Forster Square Retail Park in Bradford have all seen their market shares decline since 2012. In contrast, the three most popular comparison shopping destinations located outside of Bradford District but within the Study Area – Owlcotes Shopping Centre in Pudsey, Westside Retail Park in Guiseley, and Guiseley Retail Park in Guiseley – have all increased their appeal as comparison retail destinations since 2012.
- 5.6.19 It is notable that in monetary terms, spending in Bradford District has increased by £226.1m since 2012, from £909.6m in 2012 to £1,135.7m in 2019 due to an overall rise in Study Area

residents' total comparison spending over this period (from £1,522.9m in 2012 to £1,962.6m in 2019).

Comparison Goods Expenditure Retention within Bradford District

- 5.6.20 Table 5.8 provides a breakdown of the market share of residents in each zone which is retained within Bradford District, and compares this with the findings of the 2012 Retail Study.
- 5.6.21 It can be seen that for Zones 1, 5, 7 and 12 to 16, over 77% of residents' comparison goods spending is retained within Bradford District, which has increased in each case since 2012. The highest levels of expenditure retained in the district are within Zones 7, 14, 15 and 16, which cover the centre and north of the Bradford urban area, at 85.1%, 93.2%, 87.0% and 86.4% of the available expenditure in those zones, respectively. These are the zones where Bradford City Centre or Keighley Town Centre is the dominant shopping destination.
- 5.6.22 In Zones 2, 3, 6 and 8, Bradford District retains more modest market shares, of 64.3%, 65.7%, 70.4% and 63.4%. Zones 2 and 3 extend across the Bradford District boundary and it is identified above in the analysis of main destinations for comparison shopping expenditure by zone that for Zones 2 and 3, along with Zone 6, that residents shopping patterns are dispersed across numerous different destinations. Residents in these zones shop primarily within the District, but also travel to competing destinations nearby, most notably Leeds City Centre, Skipton Town Centre and Birstall Shopping Park/Junction 27 Retail Park/Ikea in Birstall. Zone 8 is encompassed within Bradford District bordering Calderdale District. After Bradford City Centre, Halifax Town Centre and other destinations in Calderdale are therefore important shopping destinations for residents in this zone.
- 5.6.23 Bradford District attracts the lowest market shares in Zones 4, 9, 10, 11, 17 and 18, which all extend across the Bradford District boundary to encompass areas outside of the district, or, as in the case of Zone 9, are located entirely outside of Bradford District. For residents of Zones 4 and 17, residents principally shop at destinations in Guiseley for their shopping, which is unsurprising given that Guiseley is located within Zone 4 and the proximity of Zone 17 to Guiseley. For residents of Zone 9, the most popular shopping destination is Halifax, which is located in close proximity to Zone 9. The most popular comparison shopping destination for residents of Zone 10 is Brighouse Town Centre, which is located within the zone, followed by Birstall Shopping Park/Junction 27 Retail Park/Ikea located just outside of Zone 10. For residents in Zone 11, residents principally travel to destinations in Leeds District, which is unsurprising given the proximity of Zone 11 to Leeds. Destinations in

Kirklees District are also popular for Zone 11 residents. In Zone 18, residents principally shop at destinations in Pudsey, which is within Zone 18, as well as in Leeds.

Table 5.8: Comparison Goods Spending Market Share of Bradford District by Zone

Zone	2019 Total Comparison Expenditure £m	2019 Spending in Bradford District £m	2019 Bradford District Market Share %	2012 Bradford District Market Share %
1	71.2	55.0	77.2	72.6
2	83.0	53.3	64.3	70.7
3	115.2	75.7	65.7	60.7
4	167.6	49.4	29.5	41.2
5	60.6	48.9	80.6	86.1
6	102.4	72.1	70.4	67.7
7	93.7	79.7	85.1	74.2
8	84.2	53.4	63.4	51.9
9	98.1	6.1	6.3	9.8
10	156.9	39.0	24.8	44.8
11	103.9	38.2	36.8	38.6
12	60.3	50.1	83.1	75.4
13	157.6	126.6	80.3	78.2
14	143.1	133.3	93.2	87.7
15	110.2	95.9	87.0	76.3
16	68.2	59.0	86.4	80
17	102.8	43.2	42.0	48.2
18	183.5	56.8	30.9	50.5
Study Area Total	1,962.6	1,135.7	57.9	59.5

Source: Tables 32 and 33 at Appendix 7, and the 2013 Study.

- 5.6.24 Table 5.8 identifies changes in Bradford District’s market share at a zonal level since 2012. Some variation in the household survey results compared to at 2012 is to be expected at a zonal level, reflecting a wider confidence interval compared to the Study Area as a whole. Nevertheless, the significant changes in Bradford District’s market share within several zones points to a wider shift in comparison goods shopping patterns amongst the residents of these zones.
- 5.6.25 The most significant increase is seen in Zones 7, 8 and 15. In Zones 7 and 8, residents’ spending in Bradford District has increased by 10.9 and 11.5 percentage points respectively. This is principally due to an increase in the comparison market share attracted to Forster Square Retail Park and other out-of-centre retail destinations in the Bradford urban area, as well as increased spending at local destinations in Zones 7 and 8. The opening of B&M in

Clayton (Zone 8) in 2018 and Aldi in Allerton (Zone 7) in 2016 in particular, have contributed to an improved local comparison retail offer within these two zones.

- 5.6.26 In Zone 15, the proportion of residents' spending in Bradford District has increased by 10.7 percentage points since 2012, from 76.3% to 87.0%. Neighbouring Zones 12, 13, 14 and 16 have also seen Bradford District's market share increase since 2012 ranging from 2.1 to 7.7 percentage points. These five zones cover Bradford City Centre and much of the surrounding Bradford urban area. This is principally due to an increase in the level of comparison goods expenditure spent in Bradford City Centre and Forster Square Retail Park in these zones. Conversely, the proportion of residents' comparison goods spending in Leeds City Centre and the White Rose Shopping Centre in Leeds in particular has decreased.
- 5.6.27 The proportion of comparison expenditure retained within Bradford District within Zones 4, 10 and 18 have seen the most significant decreases since 2012, of -11.7, -20.0, -19.6 percentage points, respectively. In Zone 4, as well as in neighbouring Zone 17 albeit to a lesser extent, the level of residents' expenditure spent at destinations in Guiseley has increased since 2012, whereas the proportion of spending in Keighley Town Centre and Bradford City Centre has decreased. In Zone 10, the level of comparison goods expenditure spent in Brighouse Town Centre within Zone 10 has increased compared to at 2012, whilst the level of spending in Bradford City Centre has decreased. In Zone 18, a higher proportion of residents' spending is now going to the Owlcotes Centre in Pudsey, which is located within the zone, compared to at 2012, whereas the level of spending in Bradford City Centre has decreased.
- 5.6.28 Positively, these findings point to the increased attraction of Bradford City Centre to the city's residents, with fewer residents within the Bradford urban area now travelling to competing centres further afield for their comparison shopping.
- 5.6.29 Of some concern, however, is the decrease in the attraction of Bradford District, specifically Bradford City Centre and Keighley Town Centre to residents in the east and south of the Study Area. Significant competition exists within the wider area. Numerous competing centres and out-of-centre retail destinations are located in close proximity to Bradford District, including the regional centre of Leeds and sub-regional retail facilities such as the White Rose Shopping Centre in Leeds and Birstall Shopping Park/Junction 27 Retail Park/Ikea in Birstall.
- 5.6.30 Inspection of the changes to shopping patterns indicates that the decrease in Bradford District's market share in these areas is largely due to improvements in the retail provision

available within these zones, but outside of the district. Overall, the retention rate across the Study Area has increased. Therefore, whilst Bradford District's market share has decreased in these areas, the fact that residents' comparison retail needs are increasingly being met locally should be viewed positively. Nevertheless, it is evident that Bradford City Centre's wider appeal is limited and has continued to be eroded in recent years. It is therefore considered important for the Council to focus any future developments and investments on meeting the needs of residents within its core catchment and maintaining the city centre as a choice destination for residents.

Categories of Comparison Goods Shopping

- 5.6.31 It is also useful to look at the proportion of retention of expenditure within Bradford District for the eight separate categories of comparison goods. Table 5.9 below provides a breakdown of the market share for each of the eight categories attracted to the principal comparison destinations both within and outside of the Study Area.

Clothing & Footwear

- 5.6.32 Table 5.9 show that Bradford City Centre is the most popular destination for Study Area residents' spending on clothing and footwear. Bradford City Centre claims 30.2% (£164.7m) of the Study Area residents' total £544.9m expenditure on clothing and footwear. Leeds City Centre is the next most popular destination for clothing and footwear, which attracts a market share of 13.0%, followed by Keighley Town Centre (5.8%), Forster Square Retail Park in Bradford (5.5%), White Rose Shopping Centre in Leeds (5.3%) and Owlcotes Centre in Pudsey (4.5%).
- 5.6.33 Examination of the 2012 Bradford Retail Study Update findings indicates that the market share of Bradford City Centre for spending on clothing and footwear has increased from 21.2% at 2012²⁴ to 30.2% at 2019. Bradford City Centre's market share of spending on clothing and footwear has therefore increased by a substantial 9.0 percentage points since 2012. This large increase is likely to reflect the opening of Broadway Shopping Centre in the city centre in 2015.
- 5.6.34 Clothing and footwear accounts for nearly a third of all comparison goods spending and is fundamental to a strong city centre comparison retail offer. Consumers generally prefer a comprehensive choice when buying such items and, therefore, often make clothing and footwear purchases at higher order centres. The clothing and footwear market share of

²⁴ Derived from Table 9 at Appendix 7 of the 2012 Study

Bradford City Centre is now relatively strong given its position in the wider retail hierarchy and proximity to the higher order Leeds City Centre.

Books, CDs and DVDs

- 5.6.35 Table 5.9 shows that Bradford City Centre claims 25.9% (£22m) of the Study Area residents' total £84.7m expenditure on books, CDs and DVDs. Leeds City Centre is the next most popular destination for books, CDs and DVDs, attracting a market share of 9.6%, followed by Keighley Town Centre (8.0%).

Small Household Goods

- 5.6.36 Table 5.9 shows that Bradford City Centre attracts a market share of 11.3% (£20.5m) of resident's total £181.6m expenditure on small household goods and is the most popular destination for these types of products. The next most popular destinations for small household goods are Ikea in Birstall, which attracts a market share of 8.2%. The adjacent Birstall Shopping Park/Junction 27 Retail Park further attract a market share of 4.0%. Leeds City Centre (6.8%), Alston Retail Park in Keighley (6.2%) and Keighley Town Centre (5.4%) are also popular destinations for spending on small household goods.

Recreational Goods

- 5.6.37 Bradford City Centre is the and attracts a market share of 18.0% (£49.6m) of resident's total £276.0m of expenditure on recreational goods and is the most popular destination for such purchases. The next most popular destination is Keighley Town Centre, which attracts a market share of 9.2%, followed by Leeds City Centre (6.1%) and Guiseley Retail Park in Guiseley (5.2%).

Chemist Goods

- 5.6.38 Bradford City Centre attracts a market share of 15.2% (£47.6m) of resident's total £313.0m expenditure on chemist/health and beauty goods, which is a reasonable market share considering that many of these types of products are typically purchased locally. The next most popular destination is Keighley Town Centre (10.6%), followed by Shipley Town Centre (4.2%), Ilkley Town Centre (3.1%) and Bingley Town Centre (2.7%), again reflecting that residents are able to purchase these types of product close to home.

Electrical Goods

- 5.6.39 The most popular destination for electrical goods amongst the Study Area residents is Forster Square Retail Park in Bradford, which attracts 18.8% (£44.4m) of residents' total £236.1m expenditure on these types of products. Keighley Retail Park in Keighley is the next most popular destination attracting a market share of 9.8%, followed by Bradford City Centre (8.8%), Westside Retail Park in Guiseley (7.4%) and Keighley Town Centre (5.8%).
- 5.6.40 The retail sale of bulky electrical goods such as household appliances typically requires large amounts of low-cost floorspace that is not usually available in town centre locations. Therefore, bulky goods retail provision in out-of-centre retail locations such as at Forster Square Retail Park in Bradford and at Westside Retail Park in Guiseley should generally be considered complementary to the city and town centre retail offer in Bradford District.

DIY and Gardening

- 5.6.41 The most popular destinations for DIY and gardening goods amongst the Study Area residents are Alston Retail Park in Keighley, which attracts 14.0% (£15.4m) of residents' total £109.8m expenditure on these types of products, and Thornbury District Centre (12.4%). The high market share for DIY & gardening goods in both of these centres reflects the presence of B&Q stores at Alston Retail Park in Keighley and at Leeds Old Road in Thornbury District Centre. The B&Q at Euroway Trading Estate in Bradford is also a popular destination for DIY and gardening goods, attracting a market share of 7.6%.

Furniture

- 5.6.42 The most popular destination for furniture is Ikea Leeds/Birstall Shopping Park/Junction 27 Retail Park in Birstall, which collectively attracts 17.4% (£37.7m) of residents' total £216.5m spending on this category of goods. The next most popular destinations are Forster Square Retail Park (10.8m), Keighley Town Centre (8.6%) and Bradford City Centre (7.5%). Bulky furniture retailers are often focused in out-of-centre locations that complement the city and town centre retail offer.

Table 5.9: Main Destinations for Comparison Goods Shopping Patterns within Bradford District

Destinations	Market Share of Study Area Residents' Expenditure								
	Clothing & Footwear	Books/CDs / DVD	Small Household	Recreation	Chemist	Electrical	DIY & Gardening	Furniture	All Comparison
	%	%	%	%	%	%	%	%	%
INSIDE STUDY AREA									
BRADFORD DISTRICT									
Bradford City Centre	30.2	25.9	11.3	18.0	15.2	8.8	3.9	7.5	17.6
Keighley Town Centre	5.8	9.5	5.4	9.2	10.6	5.8	4.1	8.6	7.4
Ilkley Town Centre	2.3	4.7	1.8	2.3	3.1	0.9	2.1	1.4	2.2
Bingley Town Centre	0.4	0.8	0.6	0.8	2.7	0.8	0.7	1.3	1.0
Shipley Town Centre	1.2	3.5	2.9	2.8	4.2	3.3	2.9	2.5	2.7
Five Lane Ends District Centre	0.1	0.3	0.7	0.3	1.8	0.1	0.1	0.7	0.5
Girlington District Centre	0.1	0.1	2.2	1.1	1.2	0.5	1.7	0.7	0.8
Great Horton District Centre	0.0	0.0	0.0	0.0	0.2	0.0	0.2	0.9	0.1
Greengates District Centre	1.4	0.3	1.7	0.1	1.1	1.0	1.7	1.3	1.1
Thornbury District Centre	0.1	0.6	0.9	0.3	1.5	0.5	11.3	1.9	1.3
Tong Street District Centre	0.5	0.0	0.2	0.1	0.2	0.4	0.4	0.3	0.3
Asda, Bingley Street, Keighley	1.1	1.3	0.8	0.0	1.1	0.6	0.0	0.0	0.7
Alston Retail Park, Keighley	0.0	0.0	6.2	0.2	0.2	0.4	14.0	3.6	1.9
Keighley Retail Park, Hard Ings Road, Keighley	0.1	0.1	0.8	1.2	0.1	9.8	0.2	1.1	1.6
B&Q, Euroway Trading Estate, Bradford	0.0	0.0	0.7	0.0	0.0	0.0	7.6	0.5	0.5
Asda, Rooley Lane, Bierley, Bradford	0.3	1.2	0.6	0.1	1.0	0.9	0.2	0.0	0.5
Tesco Extra, Great Horton Road, Bradford	0.4	2.0	0.7	1.8	1.4	0.7	0.0	0.0	0.8
Forster Square RP, Valley Road, Bradford	5.5	1.2	4.7	10.0	1.9	18.8	1.0	10.8	7.2
Other Destinations									
Sub-Total Bradford District	52.4	61.9	51.3	56.2	67.1	61.3	73.6	52.4	57.9
ELSEWHERE IN STUDY AREA									
Guiseley Retail Park, Park Road, Guiseley	1.5	0.0	1.9	5.2	1.2	2.7	0.4	3.1	2.2
Westside Retail Park, Leeds Road, Guiseley	2.0	0.2	1.6	2.9	0.6	7.4	0.3	1.3	2.3
Guiseley Town Centre	1.1	0.2	1.5	1.0	3.4	2.0	1.2	2.8	1.8
Otley Town Centre	0.3	1.8	0.6	0.8	0.6	0.0	1.0	0.6	0.5
Brighouse Town Centre	0.5	1.9	0.5	1.4	2.2	0.5	1.0	2.1	1.1
Owlcotes Shopping Centre, Pudsey	4.5	2.5	5.1	1.4	2.5	2.4	0.4	0.8	2.8
Pudsey Town Centre	0.6	0.7	0.2	0.3	3.5	1.0	0.5	1.2	1.1
Other Destinations	0.6	2.1	1.2	2.1	5.0	0.5	3.8	1.8	0.6
Sub-Total Elsewhere in Study Area	11.1	9.4	12.6	15.1	19.0	16.6	8.5	13.7	11.1
Total Inside Study Area	63.6	71.2	63.9	71.3	86.1	77.9	82.0	66.1	63.6
OUTSIDE STUDY AREA									
Halifax Town Centre	3.8	4.7	2.2	4.5	2.4	1.9	1.9	3.3	3.2
Charlestown Road Retail Park, Halifax	0.0	0.0	0.0	0.0	0.0	4.7	0.1	0.2	0.6
Skipton Town Centre	1.3	1.0	1.1	2.1	0.6	0.5	0.4	0.6	1.0
Birstall Shopping Park/Junction 27 Retail Park	0.4	0.2	4.0	2.0	1.4	4.8	0.1	10.1	2.7

Destinations	Market Share of Study Area Residents' Expenditure								
	Clothing & Footwear	Books/CDs / DVD	Small Household	Recreation	Chemist	Electrical	DIY & Gardening	Furniture	All Comparison
	%	%	%	%	%	%	%	%	%
IKEA Leeds, Birstall	0.0	0.0	8.2	0.0	0.0	0.1	0.3	7.3	1.6
White Rose Shopping Centre, Leeds	5.3	1.1	0.3	2.6	1.5	0.7	0.2	0.0	2.3
Leeds City Centre	13.0	11.3	6.8	6.1	2.9	4.5	1.1	4.8	7.2
Boundary Mill, Vivary Way, Colne	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.6
Other Destinations	12.5	10.3	13.4	11.4	5.0	5.0	13.8	7.5	12.5
Total Outside Study Area	36.4	28.8	36.1	28.7	13.9	22.1	18.0	33.9	36.4
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

Source: Tables 17, 19, 21, 23, 25, 27, 29, 31 and 33 at Appendix 3.

5.7 Shopping Patterns Key Findings

Convenience Goods

- The most popular convenience retail destinations within Bradford District are the Asda in Shipley Town Centre, Morrisons in Girdlington District Centre, Morrisons and Sainsbury's in Keighley Town Centre, and the edge-of-centre Asda at Bingley Street in Keighley.
- The role of Bradford City Centre as a convenience goods destination for the Study Area residents is limited. Following the closure of Morrisons at Westgate in 2016, there are now no large foodstores in the city centre, with the Tesco and Aldi stores at Valley Road providing the closest principal foodstores. Within the urban area of Bradford, although several of the principal foodstores are located within a district or local centre, the majority are in out of centre locations.
- Keighley Town Centre fulfils a role as an important convenience shopping destination and a hub for convenience shopping for a wide rural hinterland. Shipley Town Centre is also an important destination for convenience shopping. Bingley and Ilkley Town Centres serve a more modest convenience shopping role, although Bingley's convenience role has increased following the opening of Aldi in the centre in 2015 and is likely to have increased further subsequent to the recent opening of Lidl.
- Girdlington, Thornbury, Five Lane Ends and Greengates District Centres all encompass a large supermarket and function as important convenience shopping destinations. The convenience provision in Tong Street and Great Horton District Centres is relatively small scale. Whilst there are no supermarkets in Great Horton District

Centre, local residents are served by an edge-of-centre Tesco located adjacent to the centre boundary.

- The overall retention of convenience goods expenditure in the Study Area is high, and residents do not generally need to travel far to access a choice range of main foodstore destinations. It is therefore considered that the existing convenience goods facilities in the Study Area are meeting the needs of its residents.
- Whilst the overall retention of convenience goods expenditure in the Study Area has remained stable since 2012, within the Study Area there has been a significant shift in spending from destinations within Bradford District to destinations outside of Bradford District. This shift is in part attributable to the rising popularity of the discounters Aldi and Lidl along with the development of several new Aldi and Lidl stores within the Study Area just outside of Bradford District. The increasing popularity of Asda at the Owlcotes Shopping Centre in Pudsey, as well as the Tesco and Sainsbury's stores in Brighouse have also contributed to this shift.
- Given that the high existing retention rate within the Study Area and that the new foodstores that have opened just outside of Bradford District have reduced the need for residents to travel to destinations further afield, it is considered that the scope to attract a significantly higher proportion of the Study Area residents' convenience goods expenditure back into Bradford District is limited.
- The planned investment in the redevelopment of the city centre markets will help to re-establish and strengthen the Bradford City Centre convenience retail offer.

Comparison Goods

- Bradford City Centre is the main destination amongst the Study Area residents for comparison goods shopping. Keighley Town Centre, Forster Square Retail Park in Bradford and Leeds City Centre are also major destinations for comparison goods spending. Ilkley, Bingley and Shipley Town Centres are locally important destinations for comparison retail shopping, but with limited wider appeal.
- Bradford City Centre's overall market share has fallen by a significant 3.4 percentage points since 2012 as residents at the east and southern periphery of the Study Area are increasingly shopping locally rather than travelling to Bradford City Centre. Within the Bradford urban area, however, residents' comparison goods spending in Bradford City Centre has increased.
- Bradford City Centre's market share of spending within the clothing and footwear category has also increased from 21.2% at 2012 to 30.2% at 2019, a substantial 9.0

percentage point increase. This increase in Bradford City Centre's clothing and footwear market share is an important achievement given that the clothing and footwear comparison goods category is fundamental to a strong town centre comparison retail offer and reflects the opening of Broadway Shopping Centre in the city centre in 2015.

- These findings point to the increased attraction of Bradford City Centre to the city's residents, with fewer residents within the Bradford urban area now travelling to competing centres further afield for their comparison goods shopping. Nevertheless, it is evident that, beyond the urban area of Bradford, the city centre's wider appeal as a comparison goods shopping destination is limited and has continued to be eroded in recent years. The city centre has therefore regained previous pre-eminence within the urban area of the city through recent development. This emphasises the importance of ensuring that Policy is focussed on ensuring development takes place in the city centre so that this trend can be consolidated across the wider district and beyond. The issue is whether the retail market, as it is evolving, is capable of delivering this. Policy can guide and encourage and it is apparent that the City Council are already progressing further improvements.
- The market shares of Keighley, Shipley and Ilkley Town Centres have also all decreased since 2012. Bingley Town Centre's market share has increased since 2012, reflecting the opening of the Aldi supermarket and the comparison goods offer it provides.
- In contrast, the most popular out of centre destinations have largely experienced an increase in their market share since 2012, most notably at the Owlcotes Shopping Centre in Pudsey, Birstall Shopping Park/Junction 27 Retail Park/IKEA in Birstall collectively, Westside Retail Park in Guiseley and Alston Retail Park in Keighley. This shift is most likely due to the national trend for the diversification in the types of retailers represented in out-of-centre locations and demonstrates that that the cumulative impacts of small scale and incremental changes of use of out-of-centre units can be significant.
- Of the Study Area residents' total expenditure on comparison goods, 71.7% is spent in destinations within the Study Area, which is considered to be a high retention rate given the proximity of the Study Area to the higher order settlement of Leeds City Centre and other sub-regional shopping facilities. The retention rate has increased by 3.2 percentage points since 2012 meaning that more residents are now undertaking their comparison goods shopping locally.

- Much of this increase in the retention rate across the Study Area is attributable to an increase in the market share of out-of-centre destinations in those parts of the Study Area outside of Bradford District, most notably at the Owlcotes Shopping Centre in Pudsey, Westside Retail Park in Guiseley, and Guiseley Retail Park in Guiseley. Smaller increases in the market shares of some out-of-centre retail destinations in the Bradford urban area as well as increased spending at local destinations have also contributed to this shift.
- In contrast, the market share of destinations in Bradford District has fallen slightly by 1.6 percentage points since 2012, reflecting that the district's principal shopping destinations of Bradford City Centre, Keighley Town Centre and Forster Square Retail Park in Bradford have all seen their market shares decline since 2012.
- The current economic circumstances and overall retail trends are such that the scope to increase the market share of Bradford City Centre will predominantly be the outcome of these external factors. Policy can and should continue to encourage further growth and diversification, accommodating whatever growth the market generates and supported by the other actions of the City Council. Changes in the draw of Bradford City Centre from beyond its natural catchment and any decrease in the market share of Bradford District as a whole is likely to reflect wider retail trends as the close proximity of competing major centres and expanding out-of-centre retail destinations to Bradford District. It is therefore considered that the potential for the centre to claw back a higher proportion of the comparison goods expenditure of residents across the Study Area will depend on and possibly be restricted by its position in the retail hierarchy. Within the urban area of Bradford itself, the city centre has already strengthened its overall comparison retail market share since 2012, most significantly increasing its share of spending on clothing and footwear.
- Going forwards, it is considered that the retail focus for the city centre should be on maintaining the centre as an important destination for clothing and footwear shopping and as a choice destination for the city's residents. It will be important to build on the and diversify the city centre offer, to ensure that the city centre provides a full retail, service and leisure offer that complements its existing retail offer. The planned investment in Bradford Live, along with other investment schemes within the city centre could act as this catalyst to boost the evening and leisure economy of the city centre.

6.0 Population and Expenditure

6.1 Introduction

6.1.1 This section of the report considers the population and available expenditure (for both convenience and comparison goods expenditure) across the Study Area.

6.2 Study Area Population

6.2.1 The population within each Study Area zone at the base year of 2019 and at each of the subsequent forecast years was sourced from Experian Micromarketer G3 2017 data (which was issued in December 2018). Experian data provides 2017 based population estimates that accord with the findings of the 2011 Census release and population projections from 2017. Experian's methodology is based on a 'demographic component model' that takes into consideration current age and gender estimates and the Government's population projections. Future population projections reflect assumed birth and death rates, and net migration.

6.2.2 Table 6.1 below sets out Experian's population projections for each zone in the Study Area for the 2019 base year and reporting years 2024, 2029, 2030 and 2034.

6.2.3 Table 6.1 shows that Experian forecasts that the overall Study Area population will increase from 724,355 persons at the 2019 base year to 767,800 persons at 2034. This equates to a total population increase of 43,445 persons, or 6.0%, over the 15-year study period from 2019 to 2034, an increase of approximately 2,900 persons per annum.

Table 6.1: Study Area Population by Survey Zone (2019 to 2034)

Zone	2019	2024	2029	2030	2034
	Persons	Persons	Persons	Persons	Persons
1	23,139	23,676	24,136	24,218	24,576
2	27,774	28,268	28,744	28,840	29,260
3	30,948	31,274	31,636	31,717	32,051
4	46,439	47,266	48,335	48,554	49,228
5	28,135	28,793	29,376	29,508	29,967
6	32,611	33,280	33,854	33,973	34,388
7	38,649	39,557	40,386	40,555	41,267
8	29,788	30,506	31,126	31,249	31,764
9	34,613	35,621	36,342	36,479	37,001
10	55,283	56,480	57,436	57,624	58,301
11	40,566	41,613	42,587	42,778	43,342
12	29,903	30,607	31,333	31,482	32,102
13	74,195	75,794	77,125	77,383	78,504
14	58,227	59,599	60,925	61,145	62,148
15	49,121	50,154	51,003	51,162	51,844
16	29,393	29,961	30,431	30,495	30,820
17	32,851	33,325	33,941	34,050	34,415
18	62,720	64,199	65,628	65,870	66,822
Total Study Area	724,355	739,973	754,344	757,082	767,800

Source: Experian Micromarketer G3 2017 Data

6.3 Retail Expenditure

Growth in Spending on Comparison and Convenience Goods

- 6.3.1 In order to calculate per capita convenience and comparison goods expenditure, the method has again utilised Experian Micromarketer G3 data which provides detailed information on local consumer expenditure which takes into consideration the socio-economic characteristics of the local population. Experian is a widely accepted source of expenditure and population data and is regularly used by retail planning consultants in calculating retail capacity.
- 6.3.2 The base year for the Experian expenditure data is 2017 (the latest available). Per capita annual expenditure growth forecasts are sourced from Experian’s Retail Planner Briefing Note 16. Figure 6 of Appendix 3 of the Retail Planner Briefing Note identifies the following annual growth forecasts for convenience and comparison goods which inform the assessment and are reproduced in Table 6.2 below.

Table 6.2: Annual Per Capita Expenditure Growth Forecasts

Year	Convenience	Comparison
	%	%
2017	0.6	3.0
2018	0.7	1.0
2019	0.1	1.5
2020	-0.1	1.8
2021	0.1	2.4
2022	-0.2	2.6
2023	0.0	2.9
2024	0.0	3.0
2025	0.0	2.9
2026	0.0	3.0
2027	0.0	3.0
2028	0.1	2.9
2029	0.0	3.0
2030	0.0	3.1
2031	0.1	3.2
2032	0.0	3.1
2033	0.1	3.2
2034	-0.1	3.1

Source: Figure 6 of Appendix 3, Retail Planner Briefing Note 16 (December 2018)

- 6.3.3 The latest growth forecasts reflect that Brexit is expected to have influence per capita expenditure growth in 2018 and 2019. Experian expects the squeeze on household incomes to continue through 2019 and 2020, but in the medium term (2021 onwards), retail sales volumes are expected to return to a stronger footing as the Brexit-related uncertainty unwinds and economic conditions improve.
- 6.3.4 For convenience goods, Experian forecasts either negative or static per capita expenditure growth between 2020 and 2036 (in the range -0.2% to 0.1%). The forecast position therefore suggests that sales will generally remain relatively static over the longer term.
- 6.3.5 Comparison goods expenditure growth has been a major driver of retail development growth for many years with both in-centre redevelopments and the significant growth of out of centre retailing, from the early DIY stores to retail parks and freestanding centres. Given the uncertainty over figures for the longer term the current forecasts do not suggest that either retailers or the retail development industry will have the sales growth to support physical expansion of the scale experienced in recent decades.

6.3.6 It should be noted for both sectors that growth in expenditure forecasting in the longer term (beyond the next ten years) should be treated with caution given the inherent uncertainties in predicting the economy's performance over time. Assessments of this nature should therefore be reviewed on a regular basis in order to ensure that forecasts over the medium and long term are reflective of any changes to relevant available data.

Growth in Spending on SFT

6.3.7 Experian Retail Planner Briefing Note 16 also provides forecasts in respect of the proportion of expenditure that will be committed through special forms of trading (comprising 'non-store retailing', such as internet sales, TV shopping and so on) over the reporting period. The assessments have 'stripped out' any expenditure which survey respondents indicated was committed via special forms of trading and instead have made an allowance derived from Experian's recommendation.

6.3.8 In considering special forms of trading, it should be noted that many products which are ordered online are actually sourced from a physical store's shelves or stockroom (particularly in the case of convenience goods). As such, expenditure committed in this manner acts to support stores and should be considered 'available' to tangible retail destinations.

6.3.9 Accordingly, in order not to overstate the influence of expenditure committed via special forms of trading, the current approach is based on Experian's 'adjusted' figure for special forms of trading (provided at Figure 5 of Appendix 3 of its Retail Planner Briefing Note 16) which makes an allowance for internet sales which are sourced from stores.

6.3.10 The proportion of expenditure committed through special forms of trading cited below at Table 6.3 is 'stripped out' of the identified expenditure as it is not available to stores within the Study Area.

6.3.11 It is noted that the proportion of expenditure committed through special forms of trading has increased at a faster rate than anticipated at the time of the 2013 Study when it was forecast that at 2019, 3.6% of convenience goods expenditure and 14.9% of comparison goods expenditure would be spend through special forms of trading. It was further expected that the growth in spending on comparison goods through special forms of trading would level off at around 2022 at 16.0%. However, current forecasts predict that spending on comparison goods through special forms of trading will reach over 21.0% at 2027.

Table 6.3: Special Forms of Trading Forecasts

Year	Convenience	Comparison
	%	%
2019	4.0	17.9
2024	4.9	20.4
2029	5.4	21.4
2030	5.5	21.4
2034	5.7	21.6

Source: Figure 5 of Appendix 3, Experian Retail Planner Briefing Note 16 (December 2018)

6.3.12 Based on the above growth rates and special forms of trading allowances, it is possible to produce expenditure estimates for each survey zone at 2019, 2024, 2029, 2030 and 2034. In doing so, the current assessment takes into account both per capita retail expenditure growth and population change.

6.4 Convenience Goods Expenditure

6.4.1 Taking into consideration the above changes in population and per capita expenditure, it is estimated that, at 2019, the resident population of the Study Area generates £1,338.1m of convenience goods expenditure²⁵. Table 6.4 below indicates that available convenience goods expenditure is then forecast to increase to £1,364.0m by 2024 and then to £1,391.8m by 2029, £1,396.8m by 2030 and £1,417.8m by 2034. The overall increase of £79.7m between 2019 and 2034 as shown in Table 6.5 represents an increase of 6.0%.

Table 6.4: Total Available Study Area Convenience Goods Expenditure

2019	2024	2029	2030	2034
£m	£m	£m	£m	£m
1,338.1	1,364.0	1,391.8	1,396.8	1,417.8

Source: Table 3 of Appendix 3

Table 6.5: Growth in Available Study Area Convenience Goods Expenditure

Growth 2019-2024	Growth 2019-2029	Growth 2019-2030	Growth 2019-2034
£m	£m	£m	£m
25.9	53.7	58.7	79.7

Source: Table 3 of Appendix 3

6.4.2 The proportion of convenience goods expenditure that is spent during 'main food' shopping trips and through 'top-up' shopping trips was estimated with reference to respondents' answers to Questions 11, 12, 17 and 18 of the household survey. Questions 11 and 17 ask

²⁵ Expressed in 2017 prices, as is every subsequent monetary value

respondents to estimate how much they usually spend on one of their main and top-up food shopping trips, and Questions 7 and 18 ask how often they usually make such main and top-up food shopping trips, respectively. All responses to these questions were analysed to derive an estimate of the split between main and top-up expenditure on a zonal basis as shown in Table 6.6 below.

Table 6.6: Assumed Split of Convenience Goods Expenditure Between Main and Top-Up Shopping

Zone	Main Food	Top-Up
	%	%
1	82%	18%
2	84%	16%
3	80%	20%
4	84%	16%
5	78%	22%
6	84%	16%
7	85%	15%
8	78%	22%
9	83%	17%
10	86%	14%
11	78%	22%
12	91%	9%
13	82%	18%
14	80%	20%
15	83%	17%
16	86%	14%
17	78%	22%
18	82%	18%

6.4.3 By applying these estimates to the total convenience goods expenditure for each zone at 2019, it is estimated (by adding together our estimates of the monetary split between main and top up shopping expenditure within each zone) that across the Study Area as a whole, £1,104.3m of convenience goods expenditure will be spent during main food shopping trips and £233.8m during top up shopping trips.

6.4.4 The proportion of the Study Area residents' convenience goods expenditure spent during main food shopping trips therefore equates to 82.5% of their overall convenience shopping expenditure. The remaining 17.5% of expenditure (which will typically be spent on regular purchases such as milk, bread and so on) is therefore attributed to the respondents' top-up convenience shopping destination.

6.5 Comparison Goods Expenditure

6.5.1 For comparison goods, Table 6.7 sets out an estimation that the resident population of the Study Area will generate £1,962.6m of comparison goods expenditure at 2019. Available comparison goods expenditure is then forecast to increase to £2,272.0m at 2024, £2,679.6m at 2029, £2,772.7m at 2030 and £3,182.8m at 2034. As identified by Table 6.8, this represents an increase of £1,220.1m, or 62.2%, between 2019 and 2034.

6.5.2 Whilst the identified expenditure increase is clearly significant, the rate of forecast growth is more modest than that which has been previously achieved. This is as a consequence of forecast growth being more modest than that which has historically been secured and also a consequence of further increases in expenditure committed through special forms of trading (most particularly, internet shopping).

Table 6.7: Total Available Study Area Comparison Goods Expenditure

2019	2024	2029	2030	2034
£m	£m	£m	£m	£m
1,962.6	2,272.0	2,679.6	2,772.7	3,182.8

Source: Table 15 of Appendix 3

Table 6.8: Growth in Available Study Area Comparison Goods Expenditure

Growth 2019-2024	Growth 2019-2029	Growth 2019-2030	Growth 2019-2034
£m	£m	£m	£m
309.4	717.0	810.0	1,220.1

Source: Derived from Table 15 of Appendix 3

6.5.3 For the purpose of this study, comparison goods expenditure has been divided into eight categories: 'DIY', 'Electrical' and 'Furniture' (these three categories collectively being referred to as bulky goods); and, 'Clothing & Footwear', 'CDs, DVDs and Books', 'Small Household Goods', 'Toys, Games, Bicycles and Recreational Goods' and 'Health and Beauty/Chemist Goods' (collectively referred to as non-bulky goods).

6.5.4 In considering the above, it should be noted that if an excess of expenditure manifests itself within the Study Area, this does not necessarily translate directly into a requirement for additional floorspace. In assessing quantitative need, it is also necessary to take account of:

- Existing development proposals;
- Expected changes in shopping patterns; and
- The future efficiency of retail floorspace.

7.0 Retail Need in Bradford District

7.1 Introduction

- 7.1.1 This section sets out an assessment of the quantitative capacity for additional convenience and comparison goods floorspace in Bradford District over the study period from 2019 to 2034. The assessment assesses capacity at five-year reporting periods over the study period (i.e. at 2019, 2024, 2029 and 2034) as well as at 2030 to tie in with Bradford's Local Plan, which covers the period up to 2030.
- 7.1.2 At the outset, it is important to note that a quantitative assessment of capacity over the long term should be viewed with caution, due to the obvious difficulties inherent in predicting the performance of the economy and shopping habits over time. In any event, any identified capacity should not necessarily be viewed as justification of new retail floorspace outside of the defined centres as this could prejudice the implementation of Bradford City Centre AAP and strategy for Shipley Town Centre set out in the Shipley and Canal Road Corridor AAP, and the development of more central sites that may be currently available or that could become available over time.
- 7.1.3 Appendix 3 provides a complete series of quantitative capacity tables that provide further detail in terms of the step-by-step application of the quantitative assessment methodology.
- 7.1.4 Following the quantitative capacity assessment, an assessment of the qualitative need for additional convenience and comparison retail floorspace in the district is undertaken. This is done by considering whether there are any deficiencies or gaps in terms of the location and quality of the existing provision, along with factors including consumer choice and competition, and over-trading at existing stores.

7.2 Capacity Formula

- 7.2.1 For all types of capacity assessment, the conceptual approach is identical, although the data sources and assumptions may differ. The key relationship is Expenditure (£m) (allowing for population change and retail growth) less Turnover (£m) (allowing for improved 'productivity') equals Surplus or Deficit (£m).
- 7.2.2 **Expenditure (£m)** – The expenditure element of the above equation is calculated by taking the population within the defined catchment and then multiplying this figure by the average

annual expenditure levels for various forms of retail spending per annum. The expenditure is estimated with reference to a number of factors, namely:

- Growth in population;
- Growth in expenditure per person per annum; and
- Special Forms of Trading (e.g. the internet, catalogue shopping and so on).

7.2.3 **Turnover (£m)** – The turnover figure relates to the annual turnover generated by existing retail facilities within the Study Area. The turnover of existing facilities is calculated using Mintel Retail Rankings and GlobalData UK Grocery Retailers reports – independent analysis that lists the sales densities for all major multiple retailers.

7.2.4 **Surplus/Deficit (£m)** – This represents the difference between the expenditure and turnover figures outlined above. A surplus figure represents an effective under provision of retail facilities within the Study Area (which, all things being equal, would suggest that additional floorspace could be supported), whereas a deficit would suggest a quantitative overprovision of retail facilities.

7.2.5 Although a surplus figure is presented in monetary terms, it is possible to convert this figure to provide an indication of the quantity of floorspace that may be required. The level of floorspace will vary dependent on the type of retailer proposed and the type of goods traded. 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 tending to have a much higher sales density than those selling DIY or furniture goods.

7.3 Future Capacity for Convenience Goods Floorspace

7.3.1 In order to appraise the need for additional convenience goods retail floorspace, first the performance of the current provision is considered. Then assessment is made as to how the performance of stores will be affected by future growth in expenditure. Next consideration is the anticipated increases in expenditure that will be available to the district's convenience goods retail facilities.

7.3.2 Following these exercises, the study then take account of any new convenience goods floorspace that has been implemented subsequent to the date of the household survey and consider the effect that extant planning commitments will have in addressing any identified convenience goods shopping needs.

Trading Performance of Existing Convenience Provision

- 7.3.3 The study assesses the individual performance of each of the main convenience goods facilities in the Bradford District by comparing the survey-derived turnover of each food retail destination to its 'benchmark' turnover in Table 11 at Appendix 3. The 'benchmark' turnover indicates the level of turnover that the store would generally be expected to attract, based on company average trading levels. A judgement can then be made on the trading performance of existing facilities by comparing the survey-derived turnover with the expected 'benchmark' turnover of existing provision.
- 7.3.4 The 'benchmark' turnover differs for each operator based on its average turnover per square metre throughout the country. Although robust up-to-date information is available in terms of the convenience goods floorspace provided by large foodstores and average turnover per square metre (from nationally published trading information from Mintel and GlobalData), it can be more difficult to quantify the extent and performance of local convenience provision as there is no single comprehensive database to rely upon. Where the study has been unable to verify the exact quantity or performance of floorspace provided by existing smaller-scale convenience goods stores (such as 'corner shops' located within defined centres), it is assumed that stores are trading 'at equilibrium' (i.e. the survey-derived turnover equates to the expected level of turnover). Accordingly, in assessing the quantitative capacity for additional convenience goods floorspace in Bradford District, the study makes an adjustment for under or over-trading at existing convenience retail stores in Bradford District in the 2019 base year²⁶.
- 7.3.5 The assessment is based upon a 'goods based' approach, which disaggregates expenditure by category type, and it is important to recognise that major foodstore operators generally sell an element of non-food goods such as books, CDs, clothing and household goods. To account for this, the typical ratio between convenience/comparison goods provision for each operator²⁷ has been applied to the estimated net floorspace of each foodstore. This provides an indication of the likely sales area dedicated to the sale of convenience goods at each store.
- 7.3.6 Whilst survey results are commonly accepted as a means by which to identify existing shopping patterns, their findings should be treated with a 'note of caution' as they can have

²⁶ Excluding any under or over-trading at smaller-scale stores for which the study was unable to verify the performance of the floorspace.

²⁷ Generally derived from GlobalData's 2018 estimates of the typical floorspace split for major convenience goods retailers. Where GlobalData data is not available or is considered not to appropriately reflect how a store trades in practice, professional judgement has been applied in the manner set out in the notes to Table 11 of Appendix 3.

a bias towards national multiple retailers and, as a consequence, may overstate the role and performance of larger national multiple stores whilst understating that of smaller stores and independent retailers. To minimise the potential for such bias, the household survey asked shoppers where they last undertook particular types of shopping rather than where they most frequently shop, which is more likely to record infrequent purchases that are typically made at smaller centres and stores.

- 7.3.7 A summary of a benchmark assessment showing the current overall trading position of convenience goods floorspace in the city and town centres, and across Bradford District as a whole compared against the expected 'benchmark' turnover is provided in Table 7.1 below.

Table 7.1: Overall Trading Performance of Foodstores in Bradford District at 2019

Destination	Zone	Benchmark Turnover	Survey Turnover	Over- or Under-trading
		(A)	(B)	(B-A)
		£m	£m	£m
Bradford City Centre	14	17.9	9.8	-8.1
Keighley Town Centre	5	81.5	126.0	44.5
Ilkley Town Centre	3	46.4	21.8	-24.5
Bingley Town Centre	6	24.1	27.0	3.0
Shipley Town Centre	16	44.8	75.9	31.1
Other Destinations in Bradford District	-	712.3	667.0	-45.4
Total Bradford District	-	927.0	927.5	0.5

Source: Table 11 at Appendix 3

- 7.3.8 The assessment identifies that taking all convenience goods retail facilities in Bradford District together, the total £927.5m turnover identified to be drawn from the Study Area residents is £0.5m higher than the expected turnover of provision is £927.0m per annum at 2019. In assessing the quantitative capacity for convenience goods floorspace in the district the study therefore makes an allowance for this £0.5m of over-trading to be included in the capacity.

Surplus Expenditure Available for Additional Convenience Goods Floorspace

- 7.3.9 Table 7.2 below sets out the surplus convenience expenditure available to support additional convenience goods retail floorspace in Bradford District. The surplus expenditure assessment takes account of the current convenience goods trading position compared against the 'benchmark' (or anticipated) turnover of existing convenience goods floorspace and identifies the position prior to taking account of planning commitments for new convenience goods floorspace.

7.3.10 Of the total £1,338.1m of convenience goods expenditure generated by residents of the Study Area, £927.5m is spent in destinations within Bradford District at 2019 equating to a market share of 69.3% (the proportion of the Study Area residents' expenditure on convenience goods which is spent in Bradford District). Given the geography of the district, its strong retention of convenience goods expenditure across Zones 1, 2, 3, 5 to 8 and 12 to 16, and the proximity of residents in the east and southern periphery of the district to facilities in neighbouring Leeds, Kirklees and Calderdale districts, the current assessment assumes that the current market share of facilities in Bradford District is maintained over the study period to 2034.

Table 7.2: Surplus Expenditure Available for Additional Convenience Goods Floorspace in Bradford District

Year	Study Area Residents' Total Convenience Expenditure	Total Available Expenditure in Bradford District	Benchmark Turnover of Existing Stores	Surplus Expenditure
	(A)	(B=A x 69.3%)	(C)	(B-C)
	£m	£m	£m	£m
2019	1,338.1	927.5	927.0	0.5
2024	1,364.0	945.5	938.2	7.3
2029	1,391.8	964.7	940.1	24.7
2030	1,396.8	968.2	940.1	28.2
2034	1,417.8	982.8	940.1	42.7

Source: Table 13 of Appendix 3

7.3.11 After increases in population and expenditure per capita are considered against the forecast changes in spending on special forms of trading, it is estimated that the total available convenience goods expenditure in Bradford District drawn from residents of the Study Area will be £945.5m at 2024, increasing to £964.7m at 2029, £968.2m at 2030 and £982.8m at 2034.

7.3.12 Table 7.2 then sets out the benchmark turnover of existing convenience retail facilities in Bradford District in the 2019 base year and projects this forward to 2034 assuming that the benchmark turnover of existing floorspace will increase through improvements in floorspace efficiency at the rates set out in Experian Retail Planner Briefing Note 16²⁸.

7.3.13 Table 7.2 shows that a convenience goods expenditure surplus of £0.5m is identified at 2019, corresponding to the current level of over-trading at existing foodstores in Bradford

²⁸ Account has been made for the turnover efficiency of existing convenience goods floorspace to change in accordance with the projections set out in Table 4a of Experian Retail Planner Briefing Note 16 (these being 0.4% at 2020, 0.2% per annum from 2021 to 2025, and 0.0% from 2026 and 2034).

District as identified in Table 7.1 above. It is estimated that the expenditure surplus will increase to £7.3m at 2024, £24.7m at 2029, £28.2m at 2030 and to £42.7m at 2034.

Commitments for New Convenience Goods Floorspace

7.3.14 The next stage is to make an allowance for planning commitments for new convenience goods floorspace, comprising floorspace implemented subsequent to the household survey in March and April 2019 and extant planning permissions. There are a number of such commitments that are expected to draw on the convenience goods expenditure available in Bradford District as scheduled in Table 12 at Appendix 3 and summarised as follows:

- The new Lidl foodstore on Main Street in Bingley Town Centre, which opened in May 2019;
- The proposed development of Eccleshill Retail Park at Harrogate Road in Bradford, which will include a Lidl foodstore and potentially a frozen food store;
- The Aldi foodstore proposed at Leeds Old Road in Thornbury in Bradford, near to Thornbury District Centre;
- An Aldi foodstore and a frozen food store proposed on land at Stanley Road in Bradford as part of a new neighbourhood centre at New Bolton Woods; and
- The proposed Airedale Mills scheme at Ives Street in Shipley, which will include a discount foodstore and potentially another food store.

7.3.15 There is also a planning commitment for a proposed development of a new food market building at Darley Street in Bradford City Centre (planning application ref. 19/00737/REG). However, the proposed market building at Darley Street will replace the existing Oastler Market building in the city centre, which is expected to be demolished and the site redeveloped for housing. The Darley Street market scheme is not therefore expected to deliver a net overall uplift in convenience goods floorspace or turnover in Bradford City Centre. Accordingly, the study has not made an allowance for the convenience turnover of this commitment to be deducted from the available convenience goods expenditure in Bradford District.

7.3.16 As shown in Table 7.3 below, it is estimated that retail planning commitments that are expected to draw on the available convenience goods expenditure in Bradford District would have a combined turnover of £71.8m if operational in the 2019 base year.

Table 7.3: Allowance for Planning Commitments for New Convenience Goods Floorspace

Application Reference	Proposed Development	Uplift in Net Convenience Sales Area Floorspace	Total Convenience Turnover	Convenience Turnover Drawn from Bradford District
		sq.m	£m	£m
17/03704/MAF	Lidl, Main Street, Bingley	1,061	11.0	11.0
17/04007/MAF	Eccleshill Retail Park, Harrogate Road, Bradford	1,950	17.2	16.3
17/01491/MAF	Aldi, Leeds Old Road, Thornbury, Bradford	960	10.7	8.0
14/04817/MAF	Aldi and frozen food store, Stanley Road, Bradford (New Bolton Woods)	1,689	16.2	16.2
17/04007/MAF	Airedale Mills, Ives Street, Shipley	1,510	17.2	16.3
Total		7,169	71.8	68.2

Source: Table 12 at Appendix 3

- 7.3.17 The study has assumed that all of the estimated convenience turnover of the Lidl foodstore in Bingley, the Aldi and frozen food store proposed as part of the New Bolton Woods neighbourhood centre, and the proposed Airedale Mills scheme will be drawn from the available expenditure within Bradford District. However, for the proposed Eccleshill Retail Park and Aldi schemes, which are both located at the eastern periphery of the Bradford urban area in proximity to the district boundary, it is assumed that only a proportion of the expected turnover of these commitments will be drawn from Bradford District.
- 7.3.18 For the Eccleshill Retail Park scheme, the study has assumed based on professional judgement and taking account of existing shopping patterns and the scale, type and location of the floorspace proposed, that 95% of the expected turnover will be drawn from Bradford District. For the proposed Aldi in Thornbury, it is assumed that 75% of the store's turnover will be drawn from Bradford District. The remaining turnover of these commitments is assumed to be drawn from outside of the district.
- 7.3.19 Overall, it is estimated that £68.2m of the total turnover of the commitments would be drawn from the available expenditure within Bradford District if operational in the 2019 base year.
- 7.3.20 Full details of the assumptions made in estimating the turnover of commitments are provided in the notes which accompany Table 12 at Appendix 3.

Residual Quantitative Need for Additional Convenience Goods Floorspace

7.3.21 Table 7.4 below sets out the residual convenience expenditure capacity in Bradford District taking into account the turnover requirements of the commitments for new convenience retail floorspace. The estimated turnover of the commitments is deducted from the surplus expenditure capacity figures identified in Table 7.2 above.

Table 7.4: Residual Quantitative Need for Additional Convenience Goods Floorspace in Bradford District after Implementation of Commitments

Year	Surplus Convenience Goods Expenditure	Turnover of Commitments	Residual Convenience Goods Expenditure	Floorspace Requirement
	(A)	(B)	(C=A-B)	(C/£11,720 per sq.m)
	£m	£m	£m	sq.m
2019	0.5	68.2	-67.7	-5,800
2024	7.3	69.1	-61.8	-5,200
2029	24.7	69.9	-45.2	-3,800
2030	28.2	70.7	-42.6	-3,600
2034	42.7	71.6	-28.9	-2,400

Source: Table 13 at Appendix 3

- 7.3.22 The residual expenditure identified when taking account of the turnover of commitments is then converted into floorspace requirements using an sales densities of £11,720 per sq.m, which is the average sales density for the top ten convenience operators (Aldi, Asda, Co-op, Iceland, Lidl, M&S Food, Morrisons, Sainsbury's, Tesco and Waitrose).
- 7.3.23 The expenditure surplus reduces to a residual deficit of –£67.7m at 2019 once the turnover requirements of planning commitments are taken into account. Even after increases in population are considered against the changes in expenditure and floorspace productivity, the residual convenience expenditure capacity will remain in deficit over the entire study period to 2034, albeit decreasing to –£28.9m at 2034.
- 7.3.24 Accordingly, such is level of under-trading at existing stores and the quantity of convenience goods floorspace already committed in Bradford District, that there is no quantitative requirement for any additional convenience goods floorspace within the district over the entire study period to 2034. However, given the inherent uncertainties in predicting the economy's performance over time, it is recommended that the longer term (beyond ten years) estimates are viewed with some caution.

7.4 Future Capacity for Comparison Goods Floorspace

- 7.4.1 Turning to comparison goods capacity, it is important to note that the methodology deviates from that in respect of convenience goods for two principal reasons. Firstly, it can be extremely difficult to attribute an appropriate benchmark turnover to existing comparison goods provision. Secondly, there tends to be greater disparity between the trading performance of apparently similar comparison goods provision depending on its location, the character of the area and the nature of the catchment.
- 7.4.2 As a consequence, it is not considered appropriate to calculate a benchmark trading performance for comparison goods floorspace based on an assumed sales density. Instead, the study adopts the approach that comparison goods floorspace is trading 'at equilibrium' at 2019 (i.e. survey derived turnover estimate effectively acts as benchmark). Accordingly, in assessing the quantitative capacity for additional comparison goods floorspace in Bradford District, no adjustment is made for under or over-trading at existing comparison retail stores in Bradford District in the 2019 base year.
- 7.4.3 Therefore, in assessing the future capacity for new comparison goods floorspace in Bradford District, the study first identifies the total comparison goods expenditure generated by the residents of the Study Area and spent in destinations within Bradford District assuming that the future performance of the district's facilities will be commensurate with its current market share.
- 7.4.4 The study then identifies the comparison goods turnover of existing stores assuming that the turnover of existing comparison goods floorspace at 2019 equals the total available expenditure within Bradford District in the 2019 base year. There is an allowance for the turnover of existing stores to increase over the study period to allow for year on year increases in the productivity of existing floorspace.
- 7.4.5 Following this exercise, the study then considers the effect that extant planning commitments for additional comparison retail floorspace will have in addressing any identified comparison goods shopping needs.

Surplus Expenditure Available for Additional Comparison Goods Floorspace

- 7.4.6 Table 7.5 below sets out the surplus expenditure available to support additional comparison goods floorspace in Bradford District.

7.4.7 Of the total £1,962.6m of comparison goods expenditure generated by residents of the Study Area, £1,135.7m is spent in destinations within Bradford District at 2019 equating to a market share of 57.9% (the proportion of the Study Area residents' expenditure on convenience goods which is spent in Bradford District). Again, it is assumed that the future performance of Bradford District's facilities will be commensurate with its current market share. The current assessment therefore 'rolls forward' this market share to examine the likely level of comparison goods floorspace required to maintain the role and function of the district's retail facilities.

Table 7.5: Surplus Expenditure Available for Additional Comparison Goods Floorspace in Bradford District

Year	Study Area Residents' Total Comparison Expenditure	Total Available Expenditure in Bradford District	Turnover of Existing Stores	Surplus Expenditure
	(A)	(B=A x 57.9%)	(C)	(B-C)
	£m	£m	£m	£m
2019	1,962.6	1,135.7	1,135.7	0.0
2024	2,272.0	1,314.7	1,300.0	14.7
2029	2,679.6	1,550.5	1,463.7	86.9
2030	2,772.7	1,604.4	1,497.3	107.1
2034	3,182.8	1,841.7	1,639.9	201.8

Source: Table 35 at Appendix 3

7.4.8 Assuming that the current market share is maintained over the study period, it is estimated that the total available comparison goods expenditure in Bradford District will increase from £1,135.7m at 2019 to £1,314.7m at 2024, £1,1550.5m at 2029, £1,604.4m at 2030 and £1,841.7m at 2034 as shown in Table 7.5.

7.4.9 Assuming that the existing comparison retail facilities in Bradford District are trading 'at equilibrium', it is estimated that existing stores attract a total of £1,135.7m of comparison goods expenditure at 2019. It is therefore assumed that there is no surplus expenditure and no quantitative need for any additional floorspace across the district at the base year. The study then estimates the future turnover requirements of existing stores taking account of the forecast increases in the sales efficiency of existing comparison goods floorspace as set out in Experian Retail Planner Briefing Note 16²⁹.

7.4.10 After accounting for forecast increases in population and comparison goods expenditure, and allowing for year on year increases in the productivity of existing floorspace and an increase

²⁹ Table 4b of the Experian Retail Planner Briefing Note 16 identifies improvements in comparison goods floorspace sales efficiency of 2.5% at 2020, 2.8% per annum between 2021 and 2025, and 2.3% per annum between 2026 and 2034.

in spending on special forms of trading, it is estimated that there will be an expenditure surplus available to support additional comparison goods floorspace within Bradford District of £14.7m at 2024, increasing to a more substantial £86.9m at 2029, £107.1m at 2030 and £201.8m at 2034.

Commitments for New Comparison Goods Floorspace

7.4.11 The next stage is to make an allowance for extant planning commitments for new comparison goods floorspace. There are a number of such commitments that are expected to draw on the comparison goods expenditure available in Bradford District as scheduled³⁰ in Table 34 at Appendix 3 and summarised as follows:

- The new Lidl foodstore on Main Street in Bingley Town Centre, which opened in May 2019;
- The proposed development of Eccleshill Retail Park at Harrogate Road in Bradford, which will include four non-food retail units and a Lidl foodstore;
- The new Aldi foodstore proposed at Leeds Old Road in Thornbury in Bradford, near to Thornbury District Centre;
- An Aldi foodstore and a frozen food store proposed on land at Stanley Road in Bradford as part of a new neighbourhood centre at New Bolton Woods; and
- The proposed Airedale Mills scheme at Ives Street in Shipley, which will include a discount foodstore, a non-food unit, and another food store or non-food unit.

7.4.12 As summarised in Table 7.6 below, it is estimated that retail planning commitments that are expected to draw on the available comparison goods expenditure in Bradford District together provide an estimated turnover of £16.4m if operational in the 2019 base year.

7.4.13 It is assumed that all of the estimated comparison turnover of the commitments within Bradford District will be drawn from the available Study Area residents' expenditure within the district.

³⁰ Only commitments providing a total gross retail floorspace of greater than 500 sq.m have been included in this assessment as it is considered that proposals of a lesser scale will not have a tangible effect on shopping patterns.

Table 7.6: Allowance for Planning Commitments for New Comparison Goods Floorspace

Application Reference	Proposed Development	Uplift in Net Comparison Sales Area Floorspace	Total Comparison Turnover	Comparison Turnover Drawn from Bradford District
		sq.m	£m	£m
17/03704/MAF	Lidl, Main Street, Bingley	264	1.6	1.6
17/04007/MAF	Eccleshill Retail Park, Harrogate Road, Bradford	1,483	7.5	7.1
18/01494/MAF	Aldi, Leeds Old Road, Thornbury, Bradford	140	1.0	0.8
14/04817/MAF	Aldi and frozen food store, Stanley Road, Bradford (New Bolton Woods)	192	1.4	1.4
17/04007/MAF	Airedale Mills, Ives Street, Shipley	955	5.0	5.0
Total		3,034	16.4	15.8

Source: Table 34 at Appendix 3

- 7.4.14 As for the convenience assessment, it has been assumed that all of the estimated comparison turnover of the new Lidl foodstore in Bingley, the Aldi and frozen food store proposed as part of the New Bolton Woods neighbourhood centre and the proposed Airedale Mills scheme will be drawn from the available expenditure within Bradford District. For the Eccleshill Retail Park scheme, it is assumed that 95% of the expected turnover will be drawn from Bradford District. For the proposed Aldi in Thornbury, it is assumed that 75% of the store's turnover will be drawn from Bradford District.
- 7.4.15 Full details of the assumptions made in estimating the turnover of commitments are provided in the notes which accompany Table 34 of Appendix 3.

Residual Quantitative Need for Additional Comparison Goods Floorspace

- 7.4.16 Table 7.7 below sets out the residual comparison expenditure capacity in Bradford District, taking into account the turnover requirements of the planning commitments for new comparison retail floorspace, and converts this to a floorspace requirement.
- 7.4.17 A residual comparison goods expenditure deficit of –£15.8m at 2019 is identified once the turnover requirements of planning commitments are taken into account. The extant planning permissions are expected to absorb all of the surplus expenditure capacity in Bradford District in the short-term period up to 2024. However, the population growth and growth in spending on comparison goods forecast will still generate a substantial expenditure residual

in Bradford District to support additional comparison retail provision in Bradford District over the longer term, of £66.5m at 2029, £56.2m at 2030 and £178.9m at 2034.

Table 7.7: Residual Quantitative Need for Additional Comparison Goods Floorspace in Bradford District after Implementation of Commitments

Year	Surplus Comparison Goods Expenditure	Turnover of Commitments	Residual Comparison Goods Expenditure	Floorspace Scope
	(A)	(B)	(C=A-B)	(C/£5,000 per sq.m)
	£m	£m	£m	sq.m
2019	0.0	15.8	-15.8	-3,200
2024	14.7	18.1	-3.4	-600
2029	86.9	20.4	66.5	10,300
2030	107.1	20.8	86.2	13,100
2034	201.8	22.8	178.9	24,800

Source: Table 35 at Appendix 3

7.4.18 Table 7.7 then translates the identified residual expenditure figures into floorspace requirements, using an average sales density of £5,000 per sq.m at 2019. The average sales density is based on the identified need being met through the delivery of high street floorspace by national multiple operators. It is estimated that there will be a comparison goods floorspace requirement by 2029, when an additional 10,300 sq.m of comparison retail floorspace will be needed, rising to 13,100 sq.m at 2030, and to 24,800 sq.m at 2034.

7.4.19 Whilst these longer-term forecasts should be treated with caution, the figures do demonstrate that over the longer term there is potentially significant capacity for additional comparison goods floorspace within Bradford District. It will be essential for the Council to consider that potential of existing vacant retail floorspace to meet the identified needs in considering the need for future development of new comparison goods floorspace.

Comparison Goods Capacity within Bradford District’s City and Town Centres

7.4.20 In Table 7.8 below sets out the surplus expenditure available to support additional comparison goods floorspace in Bradford City Centre and the four town centres in Bradford District of Bingley, Ilkley, Keighley and Shipley on an individual basis. It has been assumed that the current market share of facilities in each of these centres is maintained over the study period.

Table 7.8: Surplus Expenditure Available for Additional Comparison Goods Floorspace in Bradford District's City and Town Centres

Year	Market Share of Study Area Expenditure	Total Available Expenditure in Centre	Turnover of Existing Stores	Surplus Expenditure
	(A)	(B)	(C)	(C-B)
	%	£m	£m	£m
Bradford City Centre				
2019	17.6	345.5	345.5	0.0
2024	17.6	399.9	395.5	4.5
2029	17.6	471.7	445.3	26.4
2030	17.6	488.1	455.5	32.6
2034	17.6	560.3	498.9	61.4
Keighley Town Centre				
2019	7.4	144.7	144.7	0.0
2024	7.4	167.6	165.7	1.9
2029	7.4	197.6	186.5	11.1
2030	7.4	204.5	190.8	13.6
2034	7.4	234.7	209.0	25.7
Ilkley Town Centre				
2019	2.2	43.7	43.7	0.0
2024	2.2	50.6	50.0	0.6
2029	2.2	59.6	56.3	3.3
2030	2.2	61.7	57.6	4.1
2034	2.2	70.8	63.1	7.8
Bingley Town Centre				
2019	1.0	20.1	20.1	0.0
2024	1.0	23.3	23.0	0.3
2029	1.0	27.4	25.9	1.5
2030	1.0	28.4	26.5	1.9
2034	1.0	32.6	29.0	3.6
Shipley Town Centre				
2019	2.7	52.1	52.1	0.0
2024	2.7	60.3	59.6	0.7
2029	2.7	71.1	67.1	4.0
2030	2.7	73.6	68.7	4.9
2034	2.7	84.5	75.2	9.3

Source: Tables 36A, 37A, 38A, 39A and 40A at Appendix 3

- 7.4.21 Table 7.9 below sets out the residual comparison goods expenditure capacity in Bradford City Centre and each of the town centres in Bradford District taking into account the turnover requirements of the extant commitment for new comparison retail floorspace.
- 7.4.22 It is assumed that, of the estimated £16.4m comparison turnover of the commitments that is expected to be drawn from the Study Area residents as shown in Table 7.6, £2.7m will be drawn from the available expenditure within Bradford City Centre. It is assumed that 35% of the expected turnover of the Eccleshill Retail Park scheme will be drawn from the available expenditure within Bradford City Centre, and that 5% of the turnovers of the proposed Aldi store in Thornbury, the proposed Aldi at New Bolton Woods and the Iredale Mills scheme will

be drawn from Bradford City Centre. All of the turnover of the new Lidl store in Bingley is assumed to be drawn from Bingley Town Centre and 60% of the Airedale Mills scheme turnover is assumed to be drawn from Shipley Town Centre.

Table 7.9: Residual Quantitative Capacity for Additional Comparison Goods Floorspace in Bradford District's City and Town Centres after Implementation of Commitments

Year	Surplus Comparison Goods Expenditure	Turnover of Commitments	Residual Comparison Goods Expenditure	Floorspace Scope
	(A)	(B)	(C=A-B)	(C/£5,000 per sq.m)
	£m	£m	£m	sq.m
Bradford City Centre				
2019	0.0	2.7	-2.7	-600
2024	4.5	3.1	1.4	200
2029	26.4	3.4	23.0	3,500
2030	32.6	3.5	29.0	4,300
2034	61.4	3.9	57.5	7,900
Keighley Town Centre				
2019	0.0	0.0	0.0	0
2024	1.9	0.0	1.9	300
2029	11.1	0.0	11.1	1,700
2030	13.6	0.0	13.6	2,100
2034	25.7	0.0	25.7	3,600
Ilkley Town Centre				
2019	0.0	0.0	0.0	0
2024	0.6	0.0	0.6	100
2029	3.3	0.0	3.3	500
2030	4.1	0.0	4.1	600
2034	7.8	0.0	7.8	1,100
Bingley Town Centre				
2019	0.0	0.0	0.0	-300
2024	0.3	0.0	0.3	-300
2029	1.5	0.0	1.5	-100
2030	1.9	0.0	1.9	0
2034	3.6	0.0	3.6	200
Shipley Town Centre				
2019	0.0	0.0	0.0	-600
2024	0.7	0.0	0.7	-500
2029	4.0	0.0	4.0	0
2030	4.9	0.0	4.9	100
2034	9.3	0.0	9.3	700

Source: Tables 36D, 37D, 38D, 39D and 40D at Appendix 3

7.4.23 Table 7.9 above shows that there will be capacity within Bradford City Centre for 3,500 sq.m of additional comparison floorspace by 2029 assuming that the current market share of Bradford City Centre is maintained over this period. In Keighley Town Centre, there will be

capacity for an additional 1,700 sq.m of comparison retail floorspace, again assuming that Keighley's current market share is maintained over this period. The identified capacity within Ilkley Town Centre is much lower at 500 sq.m by 2029. There is no capacity for additional comparison floorspace within Bingley or Shipley Town Centre in the period up to 2029.

Qualitative Need

- 7.4.24 Paragraphs 31 and 32 of the NPPF makes clear that local planning authorities should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.
- 7.4.25 Deficiencies and gaps in existing retail provision can be considered on a district wide basis or in terms of the district's individual centres. As set out within Section 5 of this report, it is considered that the Study Area secures a reasonably good market share of convenience and comparison goods expenditure.

Convenience Goods Floorspace

- 7.4.26 In assessing the potential qualitative need for additional retail provision, whilst this is a more subjective matter, there are important factors to consider when reviewing the existing provision within the administrative area. Issues such as gaps in existing provision, ensuring that communities have easy access to retail facilities and that there is a range of operators to provide choice to residents, along with location specific needs such as higher levels of deprivation, all need to be taken account of when assessing the qualitative need.
- 7.4.27 As set out in detail above, the study has not identified any quantitative capacity for additional convenience floorspace across the district, once committed convenience floorspace has been taken into account. This is principally due to the commitments for new foodstores in the district including Lidl in Bingley (now open), and the proposed Lidl at Eccleshill Retail Park in Bradford, Aldi in Thornbury in Bradford, and Lidl at New Bolton Woods in Bradford.

Bradford City Centre

- 7.4.28 It is evident from the analysis of existing shopping patterns (in Section 5) and through the health check work (in Section 4 and Volume 2) that Bradford City Centre has a relatively limited convenience goods offer for a city of its size and catchment. The 2013 Study previously highlighted the weak convenience foodstore provision in Bradford City Centre.
- 7.4.29 Significant changes to in the city centre convenience offer have occurred since 2012 with an M&S Foodhall and Sainsbury's Local both opening at the Broadway. However, following the

closure of Morrisons on Westgate in the north of the city centre in 2016, there is now no large foodstore (with over 1,500 sq.m of net floorspace) which offers residents a full and choice range of convenience products within the city centre. Furthermore, neither of the discounters are represented within the city centre.

- 7.4.30 The foodhall within the Marks & Spencer store at the Broadway Shopping Centre now provides the largest food offer in the city centre. However, the M&S Foodhall is relatively small at less than 900 sq.m and largely provides an own brand and top-up food shopping offer. Other provision includes Sainsbury's Local at the Broadway Shopping Centre, Tesco Express at Sunbridge Road, Fulton Foods at John Street, and the market stalls at Oastler Market.
- 7.4.31 In the 2013 Study, WYG identified that all but one of the large foodstores surrounding the city centre – namely Morrisons in Girlington District Centre, Morrisons in Thornbury District Centre, Morrisons at Mayo Avenue and the Asda at Rooley Lane – were over-trading. Whilst the Tesco at Valley Road was found to be significantly underperforming against its expected benchmark, WYG considered this was driven by the restricted nature of the current store configuration which limits Tesco's ability to create a sufficiently attractive shopping environment for its customers. Overall, the large foodstores surrounding the city centre were found to be collectively over-trading by £40.9m at 2012, taking into account the under-trading of the Tesco at Valley Road. With this wider over-trading in mind, the study has concluded that there was a qualitative need to improve convenience goods retailing in and around Bradford City Centre.
- 7.4.32 Further to the convenience sector changes in the city centre, several new foodstores have opened across the wider city since 2012, including:
- Asda, Cemetery Road, Lidget Green, Bradford;
 - Aldi, Clayton Road, Lidget Green, Bradford;
 - Aldi, Allerton Road, Allerton, Bradford; and
 - Aldi, Valley Road, Bradford.
- 7.4.33 The Study results reaffirm that outside of the city centre, the out-of-centre Tesco at Valley Road continues to significantly underperform against its expected benchmark. However, with the opening of several new stores across the city, the growing popularity of the discount operators, and stagnating growth in convenience goods spending, the larger foodstores

surrounding the city centre are now collectively under-trading by £21.1m³¹. Across Zones 12 to 15, which cover the city centre and much of the urban area of the city, the convenience provision is collectively under-trading by £33.7m (note that this increases to £0.8m of under-trading if the £32.9m under-trading at the Tesco store at Valley Road is excluded). It is further noted that there are currently three commitments for schemes including new foodstores in Zone 15 – the proposed Lidl at Eccleshill Retail Park, Aldi and a frozen food store in Thornbury, and Aldi and a frozen food store at New Bolton Woods).

- 7.4.34 Therefore, whilst the convenience provision within the city centre remains relatively weak, the analysis of existing shopping patterns confirms that residents in Zones 12 to 15 benefit from the presence of a variety of large foodstores located within this area of the city. Significant competition exists within this area, with residents shopping at a variety of nearby stores. Within the urban area of the city, but outside of the city centre, residents are already served by the existing foodstores in the district centres and in out-of-centre locations, and this provision is set to increase further once the committed schemes for new foodstores in this area are delivered.
- 7.4.35 The study considers that a large foodstore in the city centre would deliver significant qualitative benefits, enabling residents to access a comprehensive range of convenience products, or alternatively a discount range of products, beyond that currently available in the city centre. A large city centre foodstore could also generate increased footfall and activity through linked trips with other city centre destinations.
- 7.4.36 However, it is envisaged that the potential for the Council to attract such investment is likely to be limited for the foreseeable future given the existing provision in the surrounding area and the current retail climate. All of the 'big four' foodstore operators are not currently seeking to expand their portfolio. At the discount end of the market (i.e. Aldi and Lidl), it is noted that Aldi is already represented at Valley Road some 500m north of the city centre, and Lidl has published requirements for new stores in several parts of the district, but not for Bradford City Centre.
- 7.4.37 Given the lack of any quantitative capacity to support such provision, the lack of suitable and available sites and the current retail climate, it is not considered that allocating a site for a new foodstore in Bradford City Centre is a commercially viable option for the Council.

³¹ Foodstores outside of the city centre within Zones 12 to 15 with a floorspace of 1,500 sq.m gross or more as shown in Table 11 at Appendix 3.

- 7.4.38 It is therefore considered that in the convenience sector, the focus for Bradford City Centre should be on delivering the replacement of Oastler Market with the proposed new market building at Darley Street. Bradford City Centre offers an extensive independent offer within its markets, distinct to that available within the large foodstores operated by the national multiple operators.
- 7.4.39 Delivery of the new Darley Street Market Hall provides the greatest potential to qualitatively improve the convenience role of Bradford City Centre and support the vitality and viability of the centre. Relocation of the market into the heart of the primary shopping area and in proximity of the Broadway and Kirkgate Shopping Centres will concentrate retail and service uses in this area, reduce vacancy in the centre and increase footfall through linked trips between the Darley Street Market and other city centre destinations.

Keighley Town Centre

- 7.4.40 In contrast to Bradford City Centre, Keighley Town Centre fulfils a role as an important convenience shopping destination and a hub for convenience shopping for the residents of Keighley as well as its large rural hinterland. The centre benefits from the presence of large Sainsbury's and Morrisons stores within the town centre, along with Aldi, Iceland, Farmfoods and Fulton Foods. There is also a large Asda store located immediately outside the town centre boundary.
- 7.4.41 The findings of the benchmark assessment (Table 11 at Appendix 3) indicate that the existing convenience provision in Keighley Town Centre is substantially over-trading by £44.5m above the expected level. The edge-of-centre Asda store is also over-trading by some £16.9m. However, the recent opening of Lidl in Bingley Town Centre, which is estimated to attract convenience turnover of £11.0m (Table 12 at Appendix 3), is likely to have diverted some of its trade from Keighley, thereby reducing the level of over-trading in Keighley. Nevertheless, the position in Keighley is likely to remain one of substantial over-trading and is potentially indicative of a qualitative requirement for additional convenience provision in Keighley.
- 7.4.42 However, the town centre foodstores in Keighley, and particularly Morrisons on Church Way and Sainsbury's on Cavendish Street, provide anchor foodstores in Keighley Town Centre, and any trade diversion from these important stores will affect linked trips and trade across the town centre. It is considered that the healthy trading position of these town centre stores should be supported and should not be considered to represent available 'capacity' from which an edge or out-of-centre store can acceptably divert trade to support its

turnover. Over-trading at town centre stores should only be considered an issue where it is causing problems such as keeping shelves stocked or queuing at checkouts or in the car park. No such issues were identified during the visits to the centre.

- 7.4.43 Moreover, the town already benefits from substantial convenience retail provision with representation of three of the 'big four' operators as well as one of the two leading discounters within or adjacent to the town centre boundary, which already provide a choice range of foodstore provision in the town.
- 7.4.44 It is not therefore considered that there is any qualitative need for the Council to actively plan for the delivery of new convenience floorspace in Keighley. Nevertheless, it is recommended that the Council supports the delivery of new convenience floorspace within the town centre, which would reduce the convenience over-trading in Keighley, whilst maintaining the vitality and viability of the centre.

Ilkley Town Centre

- 7.4.45 It is evident from the analysis of shopping patterns and health check work that Ilkley Town Centre has experienced a dramatic decline in its convenience goods role and function over the last decade.
- 7.4.46 Table 10 at Appendix 3 reveals that Ilkley Town Centre retains 24.2% of Zone 3 (which covers Ilkley, Addingham and Silsden) residents' convenience expenditure, which represents a substantial 19.9 percentage point fall from the 44.1% of Zone 3 residents' expenditure retained by Ilkley Town Centre in 2012. From review of the results, the decline has been principally caused by more residents in Zone 3 (probably in the western part of Zone 3 covering Silsden and Addingham) visiting the new Aldi facility in Silsden, which opened in March 2015 and retains 25.7% of Zone 3 residents' expenditure. This facility has reduced the need for residents in the western part of Zone 3 to travel to foodstores in Keighley, Ilkley or Skipton for their convenience shopping.
- 7.4.47 Ilkley Town Centre has further lost market share from residents of Zone 4, principally due to more residents (most likely in the western part of Zone 4 covering Burley in Wharfedale and Menston) visiting the new Aldi foodstore in Guiseley. Table 11 at Appendix 3 identifies that the main foodstores in Ilkley Town Centre are all trading below their expected benchmark levels, and collectively, convenience provision in the centre is under-trading by £24.5m.
- 7.4.48 The health check findings show that the centre has experienced a substantial loss of small-scale convenience outlets over the last decade. The independent convenience offer and the

variety of the offer is now somewhat limited, although it is noted that a monthly Fine Food & Local Produce Market supplements the permanent provision. Moreover, there is no representation of the main discount foodstore operators or frozen food specialists.

- 7.4.49 It is believed that this shift in performance is largely driven by wider retail trends, most notably the rise of the discounters, as well as the relatively small scale of its main foodstores, which are failing to attract residents from surrounding rural areas in the face of competition from new discount foodstores in the wider area. Although there are two relatively large foodstores in Ilkley Town Centre, and overall representation of the top convenience operators is proportionate to the requirements of the local population, there is a qualitative reason as to why residents are choosing to shop elsewhere, whether it be price, offer or overall shopping environment of the stores.
- 7.4.50 As a town centre, Ilkley should be providing a choice convenience goods offer for its residents and it is therefore considered that there is a qualitative need to improve consumer choice in Ilkley Town Centre through increasing the variety of the convenience goods offer. It is noted that Lidl has identified Ilkley as a target location demonstrating that there is market interest from a new foodstore operator to enter Ilkley. The introduction of a discount supermarket in or around Ilkley Town Centre would help to diversify the convenience offer by providing an operator at the discount end of the convenience retail spectrum, enabling Ilkley to claw back local residents' expenditure currently leaked elsewhere.
- 7.4.51 It is emphasised, however, that there is no quantitative capacity for a new foodstore in Ilkley. Convenience provision in Ilkley Town Centre is identified to be collectively trading at £24.5m below its benchmark level, although it is expected that the performance of the town centre foodstores, and particularly the M&S and Co-op, is likely to be better than identified in the assessment as these stores will benefit from visitor spending, which is not assessed as part of this Study.
- 7.4.52 Overall, it is considered that there is no overriding quantitative or qualitative need for the Council to actively plan for the delivery of new convenience floorspace in Ilkley, but that opportunities to increase and diversify its convenience goods offer should be supported, provided that any such opportunity demonstrates compliance with the sequential and impacts tests as defined by national planning policy.

ShIPLEY Town Centre

- 7.4.53 Asda and Aldi provide the main foodstores in Shipley Town Centre. Iceland, Fulton Foods and several independents are also located in the town centre. The findings of the benchmark

assessment in Table 11 at Appendix 3 indicate that the Asda and Aldi stores are both trading well, with the Asda attracting £57.5m of trade, nearly double its benchmark turnover. Overall, the convenience facilities in Shipley Town Centre are performing well and are collectively trading at £31.1m above their expected benchmark level.

- 7.4.54 As for Keighley Town Centre, the healthy trading position of town centre stores should be supported and should only be considered an issue where it is causing particular problems for customers. No over-trading issues were identified during the visits to the town centre. Moreover, over-trading has decreased since 2012, largely due to a loss of trade from the centre following the opening of a new Asda in Lidget Green and new Aldi in Idle. A new Aldi and a frozen food store at New Bolton Woods are committed as part of a new urban village development, which will improve local residents' access to such provision and potentially further reduce over-trading in Shipley Town Centre.
- 7.4.55 The 2013 Study also identified that facilities in Shipley Town Centre were trading substantially above benchmark levels (by £47.2m³²), and that two fifths of Zone 16 residents were travelling to destinations outside of Zone 16 for their convenience goods shopping. Accordingly, the 2013 Study identified a qualitative need to improve and enhance main food convenience retailing in and around Shipley Town Centre.
- 7.4.56 Since 2012, the proportion of Zone 16 residents' convenience expenditure retained by facilities in Shipley Town Centre has fallen by 5.8 percentage points from 57.6% at 2012 to 51.8% at 2019 (Table 10 at Appendix 3). Many residents travel to nearby facilities in defined centres, most notably the Morrisons in Five Lane Ends and in Girdlington District Centres and Aldi in Idle Local Centre, as well as the out-of-centre Asda in Lidget Green, and Tesco and Aldi stores at Valley Road in Bradford. As noted above, the decrease in Zone 16 residents' spending in Shipley Town Centre is primarily attributable to the opening of a new Asda in Lidget Green and new Aldi in Idle Local Centre.
- 7.4.57 Overall, it is considered that Shipley Town Centre offers a reasonable choice of main food stores for a centre of its size and a good range of large foodstores is available in the surrounding area. Although residents are required to travel to these destinations to access this choice range of provision, the most popular of these foodstores are all nearby in defined district or local centres.

³² Converted from the £42.4m in 2011 prices sourced from Table 5 of the 2013 Study based on the price indices provided in Appendix 4b of Retail Planner Briefing Note 16.

7.4.58 Nevertheless, additional convenience provision in Shipley Town Centre would deliver qualitative benefits by increasing choice and competition in the centre, and reducing the dominance of the Asda store and the need for residents to travel. It is noted that Shipley is identified as a target location by Lidl indicating that operator would likely be interested in locating in the town if a suitable site is found. However, given the existing provision in the surrounding area and the foodstore development committed at New Bolton Woods, the potential to attract one of the other main foodstores operators is limited in the current retail climate.

Bingley Town Centre

7.4.59 Bingley Town Centre retains 30.1% of Zone 6 residents' convenience expenditure, doubling the 15.2% of Zone 3 residents' expenditure retained by Bingley Town Centre in 2012. This dramatic increase in the retention of Zone 5 residents' convenience goods expenditure reflects the opening of Aldi and Sainsbury's Local in the town centre since 2012 and has reduced the need for residents to travel to destinations in Keighley in particular for their convenience shopping. After the completion of the household survey in April 2019, A new Lidl store opened in Bingley Town Centre in May 2019, which will further improve local consumer choice as well as deliver an increase in the retention of Zone 6 residents' convenience expenditure within Bingley Town Centre. It is not therefore considered that there is any qualitative need for the Council to actively plan for the delivery of further new convenience floorspace in Bingley.

Comparison Goods Floorspace

7.4.60 Turning to the qualitative need for comparison goods, the study focuses primarily on Bradford City Centre and Keighley Town Centre, which as the largest centres in Bradford District are most likely to attract the greatest interest from retail operators and developers. Consideration is also given to the need for new comparison goods provision in Ilkley, Shipley and Bingley Town Centres. Significant comparison goods retail development would not be appropriate in the district and local centres in Bradford District.

7.4.61 It is important to note that residents of Bradford District are also served by out-of-centre provision, and particularly the wide choice of comparison operators at Forster Square Retail Park in Bradford, Alston Retail Park in Keighley, Keighley Retail Park, and other destinations including those outside the district, such as Birstall Shopping Park/Junction 27 Retail Park in Birstall, Guiseley Retail Park and Westside Retail Park in Guiseley.

- 7.4.62 The quantitative assessment identifies that in the short to medium term there is limited capacity for additional comparison floorspace within Bradford District. However, there is capacity identified within the medium to long term over the plan period.

Bradford City Centre

- 7.4.63 The health check of Bradford City Centre identified that the overall national multiple comparison offer within Bradford City Centre is good, with anchor operators such as Debenhams and Marks and Spencer in the Broadway Shopping Centre; Primark, New Look and T J Hughes in Kirkgate Shopping Centre, and Wilko on Rawson Place, all occupying large units within the city centre. Overall, the health check of Bradford City Centre identified that the centre contains 186 comparison retail units. The 56 outlets within the Broadway are almost all national multiple retailers including the majority of the top high street retailers.
- 7.4.64 Whilst the overall proportion of comparison retail units and floorspace is broadly in line with the UK average, the overall clothing and footwear provision in the centre was well above the UK average in terms of both the number of units and floorspace, along with the proportion of department stores. The retail offer achieves a middle market position in Venuescore's Shopping Venue Rankings and is the third highest ranking shopping destination in the West Yorkshire sub-region, joint with Wakefield, after Leeds and Huddersfield.
- 7.4.65 The 2013 Study identified a significant qualitative need to improve the comparison goods provision within the city centre through the delivery of the Broadway Shopping Centre. The analysis of shopping patterns in Section 5 identified that the opening of the Broadway Shopping Centre in 2015 has delivered a marked improvement in the performance of the clothing and footwear offer in Bradford City Centre and that the centre is meeting the comparison retail shopping needs of the city's residents. Accordingly, there is no immediate qualitative requirement to improve the comparison offer within the city centre.

Keighley Town Centre

- 7.4.66 The health check of Keighley Town Centre identified that the proportion of comparison retail provision is broadly in line with the UK average and that the centre contains just under half of the top 28 comparison retailers, including Argos, Boots, Clarks, Clintons, Dorothy Perkins, New Look, Next, Superdrug and WHSmith. A Beales department store is also present. Overall, Keighley Town Centre contains representation in almost all categories of comparison goods, with the only notable omission being the crafts/gifts category.

- 7.4.67 However, the clothing and footwear provision is identified as below the UK average in terms of both the proportion of outlets and floorspace. Burton, HMV, Marks & Spencer, River Island and Topman/Topshop have all left the centre since 2012. These departures reflect the current commercial climate and associated down-scaling of overall portfolio offer of such operators, particularly in smaller town centres. The below average fashion offer is not surprising given the role and position of the town in the sub-regional shopping hierarchy, and its proximity to the higher order Bradford and Leeds City Centres, which provide a focus for this type of shopping. Keighley will need to manage its diminishing role as a fashion retail destination in the future in the face of increased polarisation towards large sub regional and regional centres.
- 7.4.68 Nevertheless, Keighley Town Centre benefits from a large catchment population within Keighley and its large rural hinterland and remains an important comparison shopping destination. It is therefore considered that there is potential to attract additional operators if the right type of properties in the right locations – modern large floorplate units in prime town centre location – were to become available.
- 7.4.69 The delivery of the proposed Aire Valley Retail Park scheme on the East Parade site in Keighley would provide the type of modern large floorplate retail accommodation that will allow more national multiple comparison retailers to locate in Keighley Town Centre. However, the lack of progress since 2013 in bringing a scheme forward on the East Parade site highlights the difficulties in attracting new operators to Keighley Town Centre in the current retail climate. Media reports from February 2019 states that previously interested operators had recently pulled out of the scheme and the owners of the site are now working to find new tenants that will enable the scheme to progress.
- 7.4.70 It is considered that delivering the development of the East Parade site to include modern large floorplate retail units should remain an important priority for the Council. However, it will be important that any scheme is well related to the town centre and complements rather than competes with the existing offer to ensure that the future development of the site supports the vitality and viability of the town centre.

Ilkley Town Centre

- 7.4.71 The health check of Ilkley Town Centre found the overall quantity and breadth of comparison retail provision in the centre is well above the level expected for a town of Ilkley's size. The offer is particularly focused on upmarket fashion and home interiors retailing and representation of comparison goods national multiples is also high. Ilkley Town

Centre retains 22.7% of spending on comparison goods by the residents of its own zone (Zone 3) and also attracts a market share of 13.0% from neighbouring Zone 4, which is considered to be reasonably high given Ilkley's population of around 15,000 (at 2011) and that both Zones 3 and 4 are extensive.

- 7.4.72 Overall, it is considered that the comparison retail offer in Ilkley Town Centre is particularly strong and the centre provides a focus for upmarket fashion and home interiors retailing alongside a reasonably broad overall comparison retail offer that is meeting the comparison goods needs of its residents. Therefore, there is no qualitative requirement to improve the comparison offer within Ilkley Town Centre.

ShIPLEY Town Centre

- 7.4.73 The health check of Shipley Town Centre found the comparison goods provision is in accordance with the UK average in terms of the proportion of units, but that the units are small compared to the UK average. Representation of national multiple retailers is relatively low, with only 5 of the top 28 comparison retailers located in the centre. The breadth of comparison retail provision is reasonably good for a centre of Shipley's size, excepting the level of clothing and footwear provision, which is well below the UK average.
- 7.4.74 Shipley Town Centre retains 16.9% of spending on comparison goods by the residents of its own zone (Zone 16) and also attracts a market share of 13.4% from neighbouring Zone 17, which is considered to be relatively low for a town centre serving a population of around 31,000 (Shipley and Baildon wards at 2011).
- 7.4.75 It is considered that this deficiency and the limited clothing and footwear offer is largely due to the proximity of and competition from Bradford City Centre. However, the residents of Shipley will and should continue to be attracted to the shopping facilities in Bradford City Centre as the principal centre in the district, which is only 5km away.
- 7.4.76 Overall, it is considered that Shipley Town Centre fulfils its role as an important local comparison goods shopping destination for the residents of Shipley and neighbouring Baildon and is meeting the basic comparison goods needs of its residents. Nevertheless, the attraction of more comparison goods retailers to the centre would benefit its overall vitality and viability and opportunities to increase and diversify the comparison goods offer in Shipley should be supported.
- 7.4.77 There are several relatively large vacant unit within the centre and it is therefore suggested that the main priorities in the comparison sector are to encourage the reoccupation or

redevelopment of these vacant units for retail uses, as well as enhance in the quality of the underground market building and its connections to rest of the town centre.

Bingley Town Centre

- 7.4.78 The health check of Bingley Town Centre found the centre encompasses some 35 comparison retail units comprising a mostly independent offer with representation from a limited number of top high street comparison retailers (Home Bargains, Poundland, Boots and Card Factory). Whilst the comparison retail provision within the clothing and footwear categories is extremely limited, the centre provides a reasonably varied retail offer across the other comparison goods categories.
- 7.4.79 Bingley Town Centre retains 15.3% of spending on comparison goods by the residents of its own zone (Zone 6), which is considered to be reasonable for a town centre serving settlement with a population of around 19,900 (at 2011) given its proximity to and competition from the much larger Keighley Town Centre, approximately 6km away.
- 7.4.80 Overall, it is considered that the centre provides a reasonable comparison retail offer that meets the basic comparison goods shopping needs of Bingley's residents. The comparison retail offer within the recently opened Lidl in the centre will have delivered a small increase in the comparison offer available locally. Nevertheless, the attraction of more comparison goods retailers to the centre would benefit its overall vitality and viability and opportunities to increase and diversify the comparison goods offer in Bingley should be supported.

8.0 Commercial Leisure Needs

8.1 Introduction

- 8.1.1 The approach to the assessment of commercial leisure needs departs from the retail methodology for a number of reasons, including the fragmentation of the market and the limited availability of accurate expenditure data. However, the household survey undertaken to inform the Study asked respondents questions about their use of various leisure and recreational facilities and, through reference to market share, a view can be formed as to how the Study Area, and specifically Bradford, currently meets the need of its population in relation to a range of leisure sectors, including: pubs/bars, restaurants, bingo, cinemas, ten-pin bowling and health and fitness gyms.
- 8.1.2 The analysis focuses in particular on the need for larger commercial leisure uses, such as cinema and ten-pin bowling uses, as these uses would require a site of significant size that may need to be proactively planned for through the development plan process. In contrast, leisure uses such as bars, pubs, restaurants, cafes, theatres and health and fitness gyms are more readily able to respond to market demand and improvements in provision are usually delivered incrementally on a unit by unit basis.
- 8.1.3 National statistics have also been used in respect of the typical level of provision of specific types of facilities to assist judgement in respect of the likely future need for additional facilities in the administrative area. By reference to estimated increases in the Study Area population, this benchmarking exercise informs the judgement in respect of the likely future need for additional commercial leisure facilities in the Study Area and specifically within Bradford's administrative area.
- 8.1.4 The assessment of current participation rates and proportion of visits to existing commercial leisure destinations is based on the findings from the household survey, which included residents within the adopted Study Area. The capacity figures provided below for each commercial facility is based on the expected population growth in the Study Area only.
- 8.1.5 In considering future commercial leisure provision, it should be noted that certain types of facility are often provided in locations proximate to large centres. The analysis that follows seeks to apportion future growth in commercial leisure provision on the basis of the Study Area's existing market share, but this should be viewed with some flexibility in respect of

how opportunities that come forward 'on the ground' can appropriately contribute to meeting identified needs.

- 8.1.6 For each leisure sector, the current broad patterns of existing uses are considered first, before then assessing the quantitative need for additional facilities. The study assesses needs for the next 15 years (to 2034) in line with the requirements of the NPPF and broad duration of the forthcoming Local Plan.

8.2 Participation Rates

- 8.2.1 The Household Survey asked respondents which leisure activities they participate in. Across the Study Area as a whole, which is largely reflective of Bradford's administrative area, the most popular leisure activity mentioned by respondents was visiting restaurants (which 67.6% of respondents visit), followed by the cinema (50.6%) and then pubs/bars (43.6%). There were also strong visitation rates to museums / art galleries (32.0%) and health and fitness centres (23.3%). However, less than 20% of respondents said that they visit bowling alleys (18.0%) and just under 5% of respondents now visit nightclubs (4.2%) and Bingo Halls (3.7%).
- 8.2.2 The popularity of restaurants, cinemas, pubs and visits to theatres/concerts is reflective of current national trends. Equally, the low rates of participation in bowling and bingo are very much consistent with the national picture. Indeed, it is noted that bowling participation rates across the study area have dropped by 8% (from 26%) since the 2012 Bradford Retail Study and bingo participation rates have fallen 2.3% to just 3.7% (from 6%). These trends are discussed in more detail in the sections below.

Table 8.1: Participation Rates

Leisure Activity	Participation Rate
Restaurant	67.6%
Cinema	50.6%
Pub / bars	43.6%
Theatre / concert hall	41.3%
Museum / art galleries	32.0%
Health & fitness	23.3%
Ten pin bowling	18.0%
Leisure centre activities	14.9%
Social club	7.9%
Nightclub	4.2%
Bingo	3.7%

Question 40 of Household Survey, Appendix 2

8.3 Cinema

- 8.3.1 In terms of context, in the case of the 2008 and 2013 Retail Studies it was identified that Bradford district benefited from 34 cinema screens. These were located in the Cineworld at Leisure Exchange in the heart of Bradford City Centre (16 screen), Odeon at the Gallagher Retail Park (13 screens), the Bradford National Media Museum (three screens) and Keighley Picture House (two screens).
- 8.3.2 However, since the publication of the previous Retail Study Update in 2013, there have been two further additions to the district’s cinema offer. This includes a six screen ‘The Light’ cinema, which opened in the summer of 2018 as part of The Broadway shopping centre in Bradford City Centre, and an independent two screen cinema (Ilkley Cinema) which opened in Ilkley Town Centre in November 2015. Accordingly, the number of screens serving the district currently stands at 42 in 2019.
- 8.3.3 As set out below at Table 8.2, the results of the household survey (Question 42) indicate that the Odeon, Gallagher Leisure Park, Thornbury (which lies at the western edge of the administrative area of Leeds but is probably more easily accessible to a significant number of Bradford residents) is presently the most popular cinema destination for residents in the Study Area, attracting 24.0% of all such trips. This is followed by Cineworld in The Leisure Exchange, Bradford City Centre, which attracts 16.7% all cinema visits, and then the more recently opened The Light Cinema at The Broadway in Bradford City Centre, which attracts 8.1%. Interestingly, in 2012 household survey, the city centre’s Cineworld facility was the dominant destination, attracting 37.7% of all trips. It would therefore appear that The Light’s

introduction has largely drawn customers from Cineworld, as opposed to the out of centre Odeon Leeds-Bradford at Thornbury, which is not unexpected given its proximity and more modern offer.

Table 8.2: Study Area Market Share for Cinema Visits (%)

Zone	Address	Total
Inside Study Area		
15	Odeon Luxe Cinema, Gallagher Leisure Park, Thornbury, Bradford	24.0%
14	Cineworld, The Leisure Exchange, Vicar Lane, Bradford	16.7%
14	The Light Cinema, The Broadway, Bradford	8.1%
5	The Picture House Cinema, North Street, Keighley	6.2%
3	Ikley Cinema, Leeds Road, Ilkley	4.0%
14	National Science and Media Museum, Picturerville, Bradford	3.1%
Outside Study Area		
OSA	Showcase Cinema de Lux, Gelderd Road, Birstall	13.4%
OSA	Vue, Broad Street, Halifax	8.6%
OSA	Vue, Cardigan Fields, Kirkstall Road, Leeds	6.9%
OSA	Vue, The Light, The Headrow, Leeds	2.7%

- 8.3.4 With regards the district’s smaller venues, when compared to the position in 2012, the Picture House in Keighley has increased its market share of study area cinema visits marginally to 6.2% (up from 5.6%). Meanwhile, the new independent cinema in Ilkley now claims some 4.0% of all study area cinema trips and has become the dominant destination for Zone 3 residents, with a 35.1% market share from that particular zone. Finally, the three-screen cinema at the National Science and Media Museum in Bradford City Centre was found to attract a total 3.1% of all cinema visits within the study area, which represents a fall of some two percentage points from the 2012 household survey. Again, it is suspected that the introduction of The Light elsewhere in the city centre has contributed to this change.
- 8.3.5 In terms of the influence of cinemas outside the study area, as Table 8.2 shows, of greatest significance is the Showcase Cinema on Gelderd Road, Birstall which draws 13.4% of all cinema trips made within the study area, and is particularly dominant in zones 10 and 11. This is clearly due to the scale of the facility and its proximity to and ease of access from the south-eastern periphery of the study area, with it being the closest multiplex to both Zones 10 and 11. Indeed, the Birstall facility was also identified as the most popular cinema outside the study area in the 2012 household survey, attracting 12.2% all visits.
- 8.3.6 The next most popular destination outside the survey area opened following the household survey which informed Bradford’s 2013 Retail Study Update. A 9-screen Vue cinema opened on Broad Street, Halifax at the end of 2012. This now holds a market share of 8.6% of all

cinema trips from within the study area. Most of these appear to be originating from Zone 9, which represents the northern periphery of Halifax and the southernmost outskirts of Bradford. The Halifax Vue cinema presently has a market share of 74% within this zone and, more significantly, whilst 40% of the zone's cinema goers were found to be visiting Bradford facilities in 2012, the 2019 survey shows that just 13.5% now travel north to Bradford. The opening of this facility has therefore not only had a significant influence on cinema visits in Zone 9, but also within the study area more widely.

- 8.3.7 Of the other cinemas outside the study area which attract visits from those residing within it, the Vue on Kirkstall Road in Leeds draws 6.9% (which was broadly comparable to the 2012 position) and The Light at The Headrow in Leeds attracts a further 2.7%. Remaining trips outside the study area appear to take place in a very dispersed fashion, with small numbers travelling to Leeds, Huddersfield and Harrogate. Of note is the fact that boutique 'Everyman' cinemas in Leeds and Harrogate attract a combined 2% of all study area cinema trips. This suggests that some residents are prepared to travel for what is potentially a different type of offer than is available locally.
- 8.3.8 Looking at cinema trips at a more strategic level within the study area, the 2019 household survey results find that overall cinemas within Bradford district retain 62% of all study area cinemagoers, with 38% travelling to venues outside. Compared to the position in 2012, the market share of Bradford facilities has actually fallen by 6% (from 68%) despite the introduction of eight additional screens at The Light, Bradford and Ilkley's new independent cinema. The main reason for this, as explained in the above commentary, is the introduction of a new nine screen cinema in Halifax town centre. This has become a closer, more convenient alternative to Bradford's facilities for the 34,000 people residing in Zone 9 and it is therefore inevitable that fewer will now travel north into Bradford when undertaking this activity. Notwithstanding this, it is considered that Bradford district facilities still retain a very healthy level of cinema trips that are undertaken by the study area population.
- 8.3.9 In view of the above context, it is now important to consider whether there is any quantitative or qualitative need to support additional cinema screens within Bradford district, drawing upon equivalent methodology as has been applied in each of the past two Bradford Retail Studies. The overall population within the study area is 724,355 people in 2019, increasing to 739,973 in 2024 and then to 754,344 in 2029 (as a consequence of natural population growth). Question 40 of the 2019 household shopper survey establishes that 51% of the study area population visit the cinema as part of their leisure activities. This therefore equates to some 366,806 regular study area cinemagoers in 2019, increasing to 374,715 in 2014 and 381,992 in 2019.

8.3.10 However, as established in the commentary above, Bradford’s cinema facilities do not lay claim to all of these cinemagoers, with 62.3% retained and 37.7% travelling to other settlements. Accordingly, based on the current market share, there are 228,550 people available to support cinema provision in Bradford in 2019, increasing to 233,477 in 2024 and 238,012 in 2029. This analysis is presented in Table 8.3 below.

Table 8.3: Cinema Screen Requirement – Population Analysis

Year	Study Area Population	Participation Rate (%)	Population (Informed by Participation Rate)	District's Market Share (%)	Population (Informed by Participation Rate and Market Share)
2019	724,355	51%	366,806	62.3%	228,550
2024	739,973	51%	374,715	62.3%	233,477
2029	754,344	51%	381,992	62.3%	238,012
2030	757,082	51%	383,379	62.3%	238,876
2034	767,800	51%	388,806	62.3%	242,257

8.3.11 Mintel estimates that the UK population on average visits a cinema 2.7 times per annum and that each cinema screen attracts around 42,927 separate admissions. In applying these benchmark averages to the established number of cinemagoers who use Bradford facilities, it is estimated that there will be 620,716 cinema admissions arising from the population at 2019, increasing to 634,099 at 2024, and 646,414 by 2029. Based on Mintel’s assumed number of visits required to support an individual screen (42,927), it is calculated that around 14 screens can be supported in the Study Area at 2019, increasing slightly to 15 screens at 2024 and maintaining this level on into 2029 (and beyond). The calculations are set out in Table 8.4 below.

Figure 8.4: Cinema Screen Requirement in Bradford District

Year	Population (Informed by Participation Rate and Market Share)	Number of Cinema Visits Per Person	Attendance	Number of Admissions Required to Support Screen	Screens Supported
2019	228,550	2.7	620,716	42,927	14
2024	233,477	2.7	634,099	42,927	15
2029	238,012	2.7	646,414	42,927	15
2030	238,876	2.7	648,760	42,927	15
2034	242,257	2.7	657,945	42,927	15

8.3.12 The above analysis presented in Tables 8.3 and 8.4 above indicate that the total number of screens that can theoretically be supported based on overall population, established participation rates and identified market share is a maximum of 15 over the plan period. In

contrast, the study identifies that the current number of cinema screens serving Bradford district in 2019 is 42. This would therefore suggest that there is presently an over provision of cinema screens within the administrative area and it is noted that the same conclusion was reached in both the 2008 and 2013 Bradford Retail Studies. Indeed, even if evidence of participation rates is ignored and it is assumed that residents visit the cinema on an annual basis, there would still be more screens available (412) than could theoretically be supported (30).

- 8.3.13 In terms of future cinema developments within the district, it is noted that at the time of the 2013 Retail Study update, planning permission had just been granted for an eight-screen cinema as part of the 'Worth Valley Shopping Centre' scheme on the edge of Keighley Town Centre (LPA: 11/05268/MAF). However, this project did not come to fruition and the planning permission has since lapsed. Revised commercial proposals are understood to be being prepared, but will not involve a cinema (based on the information available at the time of writing).
- 8.3.14 Meanwhile, planning permission was granted on the site of the former Royal Mail sorting office, Forster Court, Bradford City Centre for a seven screen REEL cinema on 19th October 2016 (Application Ref. 15/05725/MAF). The cinema would be provided at first floor level, with eight restaurant units beneath and a coffee shop adjacent. Planning conditions were discharged in April 2017 and the sorting office was demolished shortly thereafter. However, since this time there has been no progress with the scheme's construction, and it seems likely that the landowner (British Land) is reconsidering the viability of this scheme in the face of 'The Light' opening in The Broadway in 2018.
- 8.3.15 Whilst these pipeline cinema developments would have further enhanced the district's cinema offer from a qualitative perspective, there loss is not considered to be of particular consequence from a qualitative or quantitative perspective, given the overall supply position. This is particularly as eight further screens have been delivered in Bradford City Centre and Ilkley Town Centre in the past 6 years, and the fact that both Keighley Town Centre and Bradford City Centre already benefit from cinema offers.
- 8.3.16 Therefore, based on current supply and demand evidence, the study does not consider that there is any need for the Council to consider any positive policy approach to deliver new cinema provision in the district over the plan period, as the current provision is adequately meeting local demand. This is consistent with the advice provided as part of the last Bradford Retail Study Update in 2013. In the event that a planning application should come forward for a further cinema facility in the district, the study consider that it should be

judged on its own merits in accordance with the relevant town centre planning policy at the time of an application’s submission.

8.4 Ten-pin Bowling

8.4.1 As was the case in the 2013 Bradford Retail Study Update, there remains two bowling alleys in Bradford, which together provide some 40 lanes. This includes Hollywood Bowl, sited in The Leisure Exchange in Bradford City Centre and ‘Go Bowling’ on Market Street in Shipley Town Centre.

8.4.2 As Table 8.5 below shows, the most popular ten-pin bowling destination in the study area (and Bradford district) is Hollywood Bowl in Bradford City Centre, which attracts 64.0% of all visits. This is followed by Go Bowling in Shipley, which attracts a comparably lower 15.9% of all bowling trips. Together, Bradford district’s facilities therefore retain 79.9% of all ten-pin bowling trips undertaken by the study area population, although it is important to remember that only 18.0% of the study area population stated that they participate in this activity. Notwithstanding this, the 2013 Retail Study only identified a retention rate for Bradford’s two bowling alleys of 72.3%, so there has been some positive change in the district’s market share despite no additional development taking place.

Table 8.5: Study Area Market Share for Ten-pin Bowling Visits (%)

Zone	Address	Total
Inside Study Area		
14	Hollywood Bowl, The Leisure Exchange, Vicar Lane, Bradford	64.0%
16	Go Bowling, Market Street, Shipley	15.9%
Outside Study Area		
OSA	Hollywood Bowl, Cardigan Fields, Kirkstall Road, Leeds	7.4%
OSA	Electric Bowl, Commercial Street, Halifax	6.1%
OSA	Matrix Superbowl, Sandylands Business Centre, Carleton New Road, Skipton	3.0%

8.4.3 Given that participation rates remain relatively low, the theory on why market share may have increased is that the public is less inclined to travel longer distances when they do choose to go bowling, and are therefore using Bradford’s facilities as oppose to those in Leeds or Halifax. Furthermore, there has been a reducing number of bowling alleys over the past 10-years given their more limited popularity and, as such, those remaining have inevitably grown their market share.

8.4.4 Table 8.5 shows that those survey area residents who are leaving the study area to go bowling are visiting Hollywood Bowl on Kirkstall Road, Leeds (7.4%), Electric Bowl on

Commercial Street, Halifax (6.1%) and Matrix Superbowl, on Carleton New Road, Skipton (3.0%). It is noted that these were also the three most popular destinations beyond the survey area identified as part of the previous study, again reflecting the limited offer available even in the wider sub-region.

8.4.5 Whilst the ten-pin bowling sector in general has experienced decline over the last ten years, in very recent times, the market has shown positive signs, with Mintel³³ forecasting modest market growth equivalent to approximately 6% per annum between 2016 and 2020, slowing in 2020 to approximately 3% growth. An alternative business model has recently developed for in-centre 'boutique' bowling facilities, with a greater focus on food and beverage as a fashionable alternative to the traditional family orientated bowling experience. This business model has potential to support the evening economy within towns and cities as an alternative use for struggling nightclub venues, where the market has been found to have contracted in recent years. The future capacity for additional bowling alleys to serve Bradford over the plan period is also considered.

Table 8.6: Bowling Alley Requirement in Bradford District

Year	Study Area Population	District's Market Share (%)	Population (Informed by Market Share)	Population Required to Support One Ten Pin Bowling Lane	Bowling Lanes Capable of Being Supported in District
2019	724,355	79.9%	578,506	12,630	46
2024	739,973	79.9%	590,979	12,630	47
2029	754,344	79.9%	602,457	12,630	48
2030	757,082	79.9%	604,644	12630	48
2034	767,800	79.9%	613,203	12,630	49

8.4.6 In terms of the expected benchmark level of provision in the Study Area, note that the Mintel Tenpin Bowling report of May 2017 (the latest currently available) identified that there were 5,242 bowling lanes across the UK in 2017. This represents a decrease from the reported figure of 5,617 in 2014. Given that the UK population at 2017 was approximately 66.2 million³⁴, this equates to one lane for every 12,630 persons (as indicated in Table 8.6).

8.4.7 The overall population within the study area is 724,355 people in 2019, increasing to 739,973 in 2024 and then to 754,344 in 2029 (as a consequence of natural population growth). Based on the market share of Bradford district's bowling alleys (79.9%), this equates to there being 578,506 people available to support bowling provision in Bradford in

³³ 'Tenpin Bowling', Mintel, May 2017

³⁴ 'Population Estimates for UK, England and Wales, Scotland and Northern Ireland: Mid-2014', Office for National Statistics, June 2015

2019, increasing to 590,979 in 2024 and 602,457 in 2019. On the basis of 12,630 people being needed to support one ten pin bowling lane (based on Mintel's advice), Table 8.6 shows that the available population could theoretically sustain 46 lanes in 2019, increasing to 47 lanes in 2024, and 48 lanes in 2029.

- 8.4.8 In view of the fact that Bradford district's two existing bowling alleys currently provide a combined 40 bowling alleys, it would appear based on the capacity analysis that provision meets demand with a small additional surplus. If it is considered that large-scale tenpin bowling facilities like Hollywood Bowl in Bradford City Centre accommodate between 25 and 30 lanes, then it appears unlikely that the district could support another facility of this nature. However, the surplus of 7 to 9 lanes would lend itself to the provision of a smaller 'boutique' bowling facility within an existing defined centre, perhaps as part of a wider evening economy offer. This is the type of niche operator which Mintel indicates is currently growing within the ten-pin bowling sector.
- 8.4.9 Overall, it is not recommended that the Council plan positively to accommodate a further bowling alley to serve the district, but should respond to any business opportunities that may be presented should an operator come forward, particularly if a qualitatively different concept of an appropriate scale is being advanced. Should any proposals for such development be forthcoming, they are judged on their own merit in accordance with relevant town centre planning policy at the time of an application's submission.

8.5 Bingo

- 8.5.1 At the time of the preparation of the 2013 Bradford Retail Study, the review of the Bingo offer within the district highlighted that there were four remaining facilities, following the closure of the independent Oxford Bingo at Dudley Hill Road, Bradford. In the intervening period, Oxford Bingo appears to have reopened and is once again functioning as a small bingo and social club. However, Mecca Bingo at Little Horton in Bradford City Centre closed permanently in November 2016 and has since reopened as a children's activity centre. Accordingly, Bradford still retains four bingo halls, with these being Oxford Bingo and three Buzz Bingo facilities at Bridge Street in Bradford City Centre, Tong Street in Weaverthorpe (Bradford) and Alice Street in Keighley. It should be noted that all Gala Bingos have rebranded to Buzz Bingo following the publication of the 2013 Retail Study.

Table 8.7: Study Area Market Share for Bingo Hall Visits (%)

Zone	Address	Total
Inside Study Area		
11	Buzz Bingo, Tong Street, Bradford	32.0%
14	Buzz Bingo, Bridge Street, Bradford City Centre	25.7%
5	Buzz Bingo, Alice Street, Keighley	12.0%
15	Oxford Bingo, Dudley Hill Road, Bradford	3.6%
Outside Study Area		
OSA	Mecca Bingo, Broad Street, Halifax	8.2%
OSA	Mecca Bingo, Balm Road, Leeds	6.0%
OSA	Mecca Bingo, New York Street, Leeds	3.4%

- 8.5.2 Table 8.7 above, which is based on the findings of the 2019 household survey, shows that the most popular Bingo hall for study area residents is the Buzz Bingo on Tong Street in Weavertorpe (Bradford), which attracts 32.0% of all Bingo visits. This is followed by the Buzz Bingo in Bradford City Centre, which attracts 25.7% of all visits, and then the Buzz facility at Alice Street, Keighley which draws 12.0%. The independent Oxford Bingo on Dudley Hill Road, Bradford has a smaller market share of 3.6%.
- 8.5.3 Looking back at the previous Retail Study (2013) it is clear that all of these study area bingo halls have increased their market share since the last household survey. In the case of the Buzz Bingo at Tong Street, Bradford this is by some ten percentage points. The obvious reason for this is the closure of a Mecca bingo on Little Horton Lane in the city centre, which had previously attracted some 15.2% of all bingo visits within the study area. It would appear that this facility's market share has simply been redistributed between its nearby competitors.
- 8.5.4 In terms of trips beyond the study area to bingo halls (by the study area population), the most popular destination is Halifax's Mecca Bingo – attracting 8.2% of all visits. This is followed by visits to bingo halls in Balm Road, Leeds (6.0%) and New York Street, Leeds (3.4%). Looking back that the previous Retail Study, these market shares and this overall level of outflow is very much comparable with the position identified in 2012. This is reflective of the fact that there has been very little growth in the bingo sector over the past ten years or so.
- 8.5.5 Overall, the 2019 household shopper survey results establish that Bradford district's bingo facilities are claiming 80.4% of all bingo trips that are undertaken by residents of the study area. This represents a very marginal increase on the position identified as part of the last Retail Study, where the district's overall market share was 77.7% and can be viewed as a

positive performance, particularly given the closure of Bradford City Centre’s Mecca facility. However, of note is the fact that just 3.7% of survey respondents stated that they actually participate in Bingo, so it is in reality still a relatively small proportion of the study area population.

8.5.6 Turning to the quantitative need for additional bingo halls to serve Bradford, a broad analysis is set out in Table 8.8 below. Mintel reports³⁵ that there were 353 bingo halls in the UK at March 2017, which applying the Office for National Statistics’ estimated population of the UK of 66.2 million at that time³⁶ suggests that each hall is supported by a catchment of 187,535 persons or thereabouts. Table 8.8 applies this assumption to the study area population, it shows that based on the total population in 2019 (724,355) broadly four bingo halls could be supported. In view of the relatively substantial number of people required to support each bingo hall, even after forecast population growth to the end of the plan period , the table still shows that the maximum requirement for the district is four halls.

Table 8.8: Bingo Hall Requirement in Bradford District

Year	Study Area Population	Typical Population Required to Support Bingo Hall	Bingo Halls Capable of Being Supported in District
2019	724,355	187,535	3.9
2024	739,973	187,535	3.9
2029	754,344	187,535	4.0
2030	757,082	187,535	4.0
2034	767,800	187,535	4.1

8.5.7 Given the fact that the number of operating bingo halls in Bradford has remained static at four since the last retail study (once re-openings and closures are taken into account), the above quantitative analysis informed by Mintel’s national data appears to be very much consistent with the position on the ground locally. Supply would currently appear to meet established demand and will continue to do so over the plan period.

8.5.8 In terms of the Bingo sector’s future, Mintel³⁷ anticipates that there will be very modest year on year market growth of around 1.5% in the short term, with consumer expenditure forecast to increase from £732m at 2016 to £794m at 2021. The 2019 forecast has increased from £728m as reported by Mintel in 2015, to £767m which suggests that growth has

³⁵ ‘Casinos and Bingo’, Mintel, March 2017.

³⁶ ‘Population Estimates for UK, England and Wales, Scotland and Northern Ireland: Mid-2015’, Office for National Statistics.

³⁷ ‘Casinos and Bingo’, Mintel, March 2017

occurred at a slightly faster rate than previously anticipated which further supports indications that the industry has begun to stabilise.

8.5.9 Nevertheless, as a consequence of the generally stagnant market, and increased competition from on-line Bingo platforms, new bingo hall openings are few and far between. There is a lack of commercial desire to open new bingo halls and, from a qualitative point of view, the offer within Bradford appears sufficient to meet the low participation rates identified in the household survey. If a new facility were to come forward, it would be important to offer a qualitatively different format to that which is already provided by the Buzz bingo halls in a suitable and sustainable location.

8.5.10 Accordingly, at the current time there is no demonstrable need to improve competition and choice in bingo halls in Bradford district, although this will be subject to market demand from other bingo operators. Given that current trends for bingo halls show activity moving online instead of physical venues, future demand for new venues is expected to be very limited. The study recommends that, if demand arises in the future, proposals for such development are judged on their own merit in accordance with relevant town centre planning policy at the time of an application's submission.

8.6 Health and Fitness

8.6.1 In the health and fitness sector, the number of local authority owned leisure centres and swimming pools has generally increased in the past few years, although, with reductions to their sport and leisure funding budgets, local authorities are increasingly being required to adopt more commercial approaches. Mintel³⁸ records that, at September 2017, 32% of adults were found to use a local authority owned health centre or swimming pool. This is a minor reduction from the figure of 33% recorded in 2015 and a further reduction from the figure of 40% recorded in 2013, although operator data suggests that admissions have remained resilient overall, pointing to losses being concentrated around more casual users (who visit less often). The replacement of aging facilities to allow local authority health and fitness centres to compete with private facilities remains a key challenge.

8.6.2 Mintel³⁹ forecasts indicate that the private health and fitness sector had a market value of approximately £2.9 billion in July 2016. This is forecast to continue to grow substantially by approximately £200 million per year, reaching 3.9 billion in 2022. Mintel also notes that,

³⁸ 'Leisure Centres and Swimming Pools', Mintel, September 2017

³⁹ 'Health and Fitness Clubs', Mintel, July 2017

whilst only 12% of adults currently use a private health and fitness club, the potential for a further expansion of the market remains strong. Perhaps unsurprisingly, the 16 to 24 and 25 to 34 age groups have the highest participation rates, with 19% and 18% respectively of the population within these age groups visiting private health clubs, with participation dropping off quickly within older age groups.

- 8.6.3 The composition of the private health and fitness sector has experienced great change in recent years with the rise of budget gym operators presenting a challenge to the more established key players. Mintel indicates that the market has expanded significantly with a shift towards budget operators bringing possibilities for more convenient access and affordability for the customers. Budget operator Pure Gym has expanded to become the market leader both in terms of number of members (930,000) and clubs (176). It should be noted that Pure Gym has continued to rapidly expand year on year in terms of the number of members and sites, which were previously reported by Mintel as being 520,000 (members) and 99 (sites) in 2015.
- 8.6.4 At the same time, Pure Gym's main competitor, The Gym, has also greatly increased its membership since 2015 from 350,000 to 535,000 members and 63 to 100 clubs, albeit more modestly. Nuffield has emerged as the largest 'full service' health club chain with 476,000 members and 112 sites, overtaking David Lloyd Leisure (407,095 members, 83 sites) and Virgin Active Group (251,000 members, 61 sites) who were the largest in 2015. Mintel has predicted 25% growth for the private sector health and fitness market up to 2022, to reach a value of £3.9 billion.
- 8.6.5 Question 40 of the household survey found that 23.3% of respondents visit indoor sports and health and fitness centres and a further 14.9% confirmed that they participate in leisure centre activities. This was down on the position recorded as part of the 2012 household survey, where there was a 30% participation rate for health and fitness activities and a 28% participation rate for leisure centre activities.
- 8.6.6 Those that did participate in health and fitness / leisure centre activities were asked where this took place in Question 41 of the household survey. As would be expected in a densely populated urban area such as Bradford, a large number of different responses were provided to this question, although cumulatively it was found that some 71.0% of participants from the study area population are using sports facilities within Bradford district. This has remained broadly static since the 2012 household survey which recorded a retention rate for Bradford district of 69.2%. This is reflective of the fact that trips to health and fitness centres are typically undertaken on a localised basis and the introduction of new facilities outside the

catchment does not therefore necessarily mean that people will begin traveling greater distances to participate in the same activity.

8.6.7 Based on the answers to Question 41, some of the more popular destinations for health and fitness activities are set out below:

- **Bradford City Centre** – Facilities within and surrounding Bradford City Centre attract some 16.3% of health and fitness trips from within the study area. Key destinations included JD Gyms on Manningham Lane, Bradford (4.81%), unspecified city centre locations (5.7%), The Curve, Carlisle Road (1.56%) and Bradford University gym (1.1%)
- **Keighley** –The Town’s existing facilities retain 12.0% of all health and fitness trips within the study area. Key destinations include the leisure centre at Victoria Park (4.2%) and unspecified destinations within the town centre (4.1%). It is believed that these are also likely to largely be leisure centre trips given its proximity. Keithley’s market share is comparable with the 2012 household survey position.
- **Bradford (South West)** – Facilities in the south west of Bradford’s urban area attract some 8.5% of all health and fitness trips from within the study area. The most popular destination being the Richard Dunn Sports Centre in Odsal, which accounts for 4.2% of all such trips.
- **Bradford (North-West)** – Facilities in the north-west of Bradford’s urban area attract 7.2% of all health and fitness trips from within the study area. The most popular destination being PureGym in Thornbury which draws 4.2% of all such trips. Indeed, this is the most popular PureGym facility on the study area.
- **Shipley** – The settlement’s existing facilities retain 4.9% of all health and fitness trips within the study area. The most popular destination is Shipley swimming pool, which attracts 2.4% of all health and fitness trips. Shipley’s market share is broadly comparable with the 2012 household survey position, falling marginally from some 7% of overall survey area visits.

8.6.8 As can be seen from the above, no single destination or even settlement really dominates in terms of attracting health and fitness visitors across the study area. Indeed, there were more than 125 different destinations identified both within and outside the study area by those responding to the household survey. This reinforces the notion that health and fitness trips are largely undertaken on a localised basis and, given that Bradford facilities currently attract

more than 70% of all health and fitness trips, it would appear that current provision is meeting residents needs and they are not looking to more distant settlements for the required offer. This was the position identified and concluded upon when the previous Retail Study was prepared in 2013.

- 8.6.9 In summary, the above analysis has highlighted that the majority of those within the Study Area who visit indoor sports, health and fitness facilities use the provision provided within the Bradford authority area. From an audit of available facilities, it is also evident that this offer is appropriately distributed throughout Bradford's key settlements (likely a reflection of consumer demand) and as such from a quantitative and qualitative perspective it can be said that Bradford is relatively well provided for in terms of indoor health and fitness facilities.
- 8.6.10 Accordingly, whilst there does not appear to be a pressing need to allocate additional land for such leisure uses, it is considered that proposals for new indoor sports, health and fitness provision should be considered positively, provided that they are in accordance with the provisions of the development plan and national planning policy. Notwithstanding this, it is important to add that this study does not represent a formal sport and leisure facilities forecasting model, which is a separate specialised evidence base document. Accordingly, it cannot comment on the adequacy or otherwise of the leisure provision itself, based on Sport England criteria.
- 8.6.11 Over the plan period, there may be further opportunities for further private sector fitness clubs to be brought forward throughout the borough and in the defined centres in particular, serving both local needs but also the needs of office workers within the town and city centres. New proposals for gyms and health and fitness centres should be judged on their own merits and in accordance with local and national policy, with a town centre first approach where suitable sites are available. It may be that any such uses would come forward as part of a wider mixed-use scheme.

8.7 Restaurants

- 8.7.1 Consumer spending on eating out through visits to restaurants and takeaways is recognised as a sector which has performed well during the economic downturn. Mintel⁴⁰ identifies that the eating out market grew by around 14% between 2012 and 2016, to an estimated £66bn, and predicts that the market will continue to experience growth, forecast to be around 11% in the period up to 2022 to reach a value of £75 billion. The emergence into the restaurant

⁴⁰ 'Eating Out Review', Mintel, Sep 2017

market of multiple new specialist operators, many with significant plans for expansion, has increased opportunities for landlords to provide a diverse and distinct food offer.

8.7.2 A recent report by Savills⁴¹ entitled 'Casual Dining in the UK' has found that casual dining brands in the UK, which operate from under 25 sites, such as Wahaca and Cau, have grown by 39% over the past three years. The report identifies that such dining brands, in combination, have opened 489 new outlets across the UK. This emphasises the popularity and growth of smaller chains, a trend which has led to increased diversity and consumer choice across the sector. During the same time period brands providing a larger number of outlets such as Pizza Express, Prezzo and Nandos, have grown by 13%. In terms of the casual dining market as a whole, Savills identifies that 80% is made up of brands with fewer than 25 restaurants. The Savills report also identifies that there has been growth in different cuisines, with North American, Caribbean and Thai cuisines increasing in popularity.

8.7.1 Question 40 of the household survey identifies that visiting restaurants is the leisure activity which most of the study area population participate in (some 67.6%). Table 8.9 above, which is based on the findings of question 43 of the 2019 household survey, shows that the most popular destination for restaurant goes within the study area (and indeed Bradford district) is Bradford City Centre, which attracts 23.7% of all restaurant trips. However, when comparing this to the 2012 household survey, it actually suggests that there has been a reduction in the city centre's attraction as a restaurant destination by some 8.1% (from 31.8% in 2012).

Table 8.9: Study Area Market Share of Trips to Restaurants (%)

Zone	Address	Total
Inside Study Area		
14	Bradford City Centre	23.7%
5	Keighley Town Centre	5.2%
3	Ilkley Town Centre	5.2%
16	Shipley Town Centre	2.4%
6	Bingley Town Centre	1.9%
Outside Study Area		
OSA	Leeds City Centre	12.6%
OSA	Halifax Town Centre	4.7%
OSA	Skipton Town Centre	2.4%
OSA	Pudsey Town Centre	2.2%

8.7.2 This is surprising, particularly given that since the last retail study the city centre has benefited from additional restaurant space as part of the opening of The Broadway Shopping

⁴¹ Casual Dining in the UK, Savills, June 2016

Centre (including Pizza Express, Zizzi, Taco Bell, KFC and Burger King amongst others).

Space within Centenary Square also now benefits from more family restaurants than it did at the time of the 2012 household survey.

- 8.7.3 The reason for this perceived reduction may actually be related to the survey results themselves, rather than a weakening of the city centre's restaurant offer. The 2019 survey results are more fine grain than those received in 2012 and whilst the city centre itself has been found to attract 23.7% of restaurant visitors, other restaurant facilities within the very urban core of Bradford (survey Zones 12, 13, 14 and 15) account for a further 7.3% of restaurant visits for the study area population. Accordingly, the city centre and significant independent restaurant provision contained within the centres / arterial routes which surround it (such as Great Horton District Centre, Laisterdyke Local Centre and Leeds Road) hold a combined market share of 31.0%. This is equivalent the catch-all figure of 31.8% presented in the 2013 retail study.
- 8.7.4 Notwithstanding this realistic explanation, it would have to be acknowledged that the introduction of The Broadway's restaurant offer does not seem to have boosted the city centre's attraction as a restaurant destination – based on the static nature of its market share. As explained below, the likely reason for this is the increased competition which has resulted from the opening of Leeds Trinity in 2013 (following the last Retail Study), which in turn has claimed some of Bradford's market share.
- 8.7.5 Unsurprisingly, the next most popular restaurant destinations outside the city centre are Bradford district's town centres. The 2019 household survey has found that Keighley Town Centre attracts 5.2% of all restaurant visits, Ilkley Town Centre attracts 5.2%, Shipley Town Centre 2.4% and Bingley Town Centre 1.9%. In the case of the 2012 household survey, Keighley Town Centre claimed 5.7% of all restaurant visits, Ilkley Town Centre attracted 4.7%, Shipley Town Centre 5.9% and Bingley Town Centre 2.7%. Accordingly, it can be seen that market shares in these centres have actually remained broadly static, perhaps with the exception of Shipley. A reason for this may be the centre's proximity to Saltaire, which benefits from a disproportionate number of restaurants for a centre of its size.
- 8.7.6 In terms of restaurant visits beyond the study area by those residing within it, of particular note is that Leeds city centre has increased its market share of restaurant visits to 12.6% up from 8.9% in 2012 (increase of 3.7%). The obvious reason for this is that since the previous household shopper survey in 2012, Leeds Trinity has opened and includes some 40 bars, cafés and restaurants with further growth in surrounding areas. This has clearly resulted in a step change in Leeds city centre's evening and night-time economy and as such it is now

attracting a greater proportion of those residing within Bradford district. At less than four percentage points, the increase in market share is not considered to be an acute problem but may be something that Bradford City Centre in particular needs to address, if this trend continues.

- 8.7.7 In terms of other destinations outside the study area which are attracting study area residents; restaurants in Halifax Town Centre attract 4.7%, those in Skipton Town Centre attract 2.4%, whilst Pudsey Town Centre attracts 2.2%. Having regard to the 2012 household survey results, these market shares are very much comparable with the previously recorded positions. Halifax restaurants then claimed 5.1% of all restaurant visits, Skipton 1.9% and Pudsey 1.8%. Accordingly, it can be seen that there has been little change in the way that residents are using restaurants outside of the study area – with the exception of Leeds city centre.
- 8.7.8 Looking at the picture as a whole and drawing some conclusions from this analysis, the 2019 household survey shows that restaurants within Bradford district as a whole currently retain 56.4% of all trips made by restaurant goers in the study area. This represents a reduction of some 5% when compared to the position established by the 2012 household shopper survey. The main reason for this, as alluded to above, is the fact that Leeds Trinity appears to have boosted the market share of Leeds city centre as an 'eating out' destination for residents of the study area. Evidence also suggests that this may have reduced Bradford City Centre's overall market share in this sector, or at the very least has left it static (if the city centre's surrounding independent restaurant offer is included in market share calculations).
- 8.7.9 In terms of how the city centre (and Bradford district as a whole) might respond to this, it should be noted that planning permission was granted (Application Ref. 15/05725/MAF) on the site of the former Royal Mail sorting office (Forster Court) in Bradford City Centre for a mixed-use development comprising cinema and eight family restaurants in October 2016. The site has since been cleared and a series of planning conditions discharged. However, there has been no progress with the scheme's construction over the past two years and it speculated that the developer may be looking at an alternative composition of uses following a cinema opening at The Broadway in 2018.
- 8.7.10 The Forster Court site should be able to represent a good opportunity to introduce a wider range of modern format restaurant units to Bradford City Centre, which would appeal to national multiple operators should the market bring the site forward. In addition, the council's forthcoming plans for a new market hall on Darley Street will include a hot food offer, and this will add another dimension to the city centre's range of 'eating out' facilities.

Accordingly, there is scope to enhance the overall restaurant offer within Bradford City Centre and pipeline developments would appear to be forthcoming over the Plan Period that may achieve this.

- 8.7.11 Turning to town and district centres, market share evidence and the health check analysis has identified an adequate distribution of restaurants catering for a variety of tastes across the study area's larger centres. Given this evidence and the nature of the restaurant sector more widely, there is no overriding quantitative or qualitative need to plan positively for additional restaurants to serve any particular town or district centre. However, further in-centre provision which would diversify the current offer, particularly in Keighley, Shipley, Ilkley and Bingley should be supported where this accords with the provisions of the development plan and national planning policy.

8.8 Pubs / Bars

- 8.8.1 Despite significant pub closures in recent years, there is currently reason for optimism within the licensed premises sector, the Cask Report⁴² reporting that six fewer pubs are closing a week in 2017 than in 2016. More recent Cask Reports do not provide directly comparable figures but other sources (quoted in The Guardian) point to closures at 76 per month in 2018 but only 40 a month to July this year based on government statistics derived from ONS. Visitor numbers have been found to be stable, with the industry expected to experience modest growth in the period to 2019. Mintel identified that some 79% of adults visited a pub or bar in 2016/17 for a drink, with the 18 to 24 age group found to be most likely to drink in pubs or bars on a weekly basis. The cask ale market remains an important consideration but is not growing at a rate to turn the tide of closures on its own. A quality food offer has become increasingly important within the sector, as the contribution which food sales make to pub revenues has increased steadily over a prolonged period.
- 8.8.2 Question 40 of the household survey identifies that 43.6% of the Study Area's population visits pubs and bars during their leisure time. Question 44 shows that 55.5% of such trips are to facilities which fall within Bradford district, although (in a similar vein to restaurant use) this has fallen by some 7% from a market share of 62.5% in 2012.
- 8.8.3 As would be expected given the often local nature of such trips, a wide range of destinations (over 150) were identified by those who do visit bars/pubs as part of this leisure time and accordingly no single location dominates. This is very similar to the way that individuals use

⁴² 'Pub Visiting' Mintel, May 2017

restaurants and indeed the survey responses to both pub/bar use and restaurant use are very similar.

- 8.8.4 The most popular location in the district to visit a pub/bar for the study area population was Bradford City Centre, which attracted 15.2% of all visits. This was followed by Ilkley Town Centre (4.1%), Bingley Town Centre (4.1%), Keighley Town Centre (3.8%) and Shipley Town Centre (3.4%). Saltaire Village Centre (2.3% of all visits) was also identified as a popular destination for pub / bar visits and the health check identified a disproportionate number of evening economy facilities in this centre.
- 8.8.5 In comparing this picture to the 2012 household survey, the main observation is that Bradford's market share of pub/bar visits from those residing within the study area appears to have reduced by 4.7%, from the previous position of 19.9%. Interestingly, this is very much comparable with the changes observed in relation to restaurant use in the city centre.
- 8.8.6 In the case of Bradford's town centres, the position in Bingley (4.3%) and Ilkley (3.4%) evidently hasn't changed particularly since 2012. However, the market shares of both Shipley Town Centre (previously 6.1%) and Keighley Town Centre (previously 7.3%) have reduced slightly. The position in Saltaire Local Centre (1.6% previously) appears to have improved and this is likely to be at the cost of Shipley's attraction given its proximity and the results of the survey.
- 8.8.7 Outside the Study Area, Leeds City Centre attracts the greatest number of pub/bar visitors from within the study area. This centre's market share has risen from 7.9% in 2012 to 12.8% in 2019 (or 4.9%). As explained in relation to restaurant visits, the likely reason for this is the increased competition which has resulted from the opening of Leeds Trinity in 2013. This boasts some 40 bars, cafés and restaurants, which seemingly helped Leeds city centre claim some of Bradford's market share.
- 8.8.8 In terms of how Bradford City Centre and the district more widely can respond to this loss of market share, the approach should be consistent with the recommendations relating to restaurant provision. Proposals such as those for the former Royal Mail sorting office (Forster Court) could introduce night-time economy uses alongside restaurant provision, or indeed the restaurants themselves could stimulate investment in supporting bars/pubs elsewhere in the city centre based on the additional footfall generated. The council's forthcoming plans for a new market hall on Darley Street could equally have the same effect, as this will include a hot food offer that may also help support the evening economy. As such, it is considered

that there is scope to enhance the overall pub/bar offer within Bradford City Centre, which may begin to address the market share lost to Leeds since the opening of Trinity.

- 8.8.9 Turning to town and district centres, based on the health check assessments these are considered to be relatively well served by traditional pubs and, in the case of Ilkley, Bingley and Keighley in particular, by more modern independent bars which diversify this leisure offer. Accordingly, it is not considered that there is any clear quantitative or qualitative justification to plan for additional facilities to serve the district's centres. Notwithstanding this, it is considered that further facilities to support the evening leisure economies across Bradford's centres should be supported where these are in line with local and national planning policies.

8.9 Arts and Cultural Facilities

- 8.9.1 Arts and cultural activities play an important role in providing a distinct identity to places or towns, as well as being an important contributor to the local economy. Research by the Centre for Economic and Business Research (CEBR) in 2019 has quantified that every pound of GVA generated by the arts and culture industry, an additional £1.24 of GVA is generated in the wider economy through wider indirect and induced multiplier impacts of the industry. CEBR identify that the arts and culture sector was estimated to have produced a turnover of £48 billion and was the responsible for the employment of approximately 363,713 people in the UK in 2016.
- 8.9.2 For the purpose of this assessment, consideration is given to the provision of theatres and museum/art facilities within Bradford. Table 8.10 details the main cultural venues in Bradford district. It is important to note also that the towns and cities themselves are important attractors in themselves, with facilities such as churches, cathedrals and sporting venues which add to the overall appeal of the towns/cities to visitors.
- 8.9.3 The results of the household survey indicate that 32.0% of respondents from across the survey area visit museums and galleries. Theatres are even more popular with some 41.3% of respondents visiting these venues.
- 8.9.4 In terms of trips to undertake art and cultural activities, Question 47 of the household survey indicates that 60.5% are made to attractions within Bradford district. This represents a marginal uplift on the position recorded in 2012, where 58.3% of all trips to art and cultural activities took place to attractions within the district. Bradford City Centre is by far the most popular destination attracting 50.4% of all trips, whilst other destinations recorded included

Keighley Town Centre (2.6%), Ilkley Town Centre (2.1%) and Saltaire (1.1%). The main cultural activities outside the study area which study area residents visit include those in Leeds City Centre (21.1%) and Halifax Town Centre (4.6%).

Table 8.10: Cultural Facilities in Bradford District

Type	Name
Museum	<ul style="list-style-type: none"> • National Science and Media Museum, Bradford City Centre • Cliffe Castle Museum, Keighley • Bradford Industrial Museum, Moorside Road, Bradford • Bolling Hall, Bradford • Bradford Police Museum, Bradford City Centre • Vintage Carriages Trust Museum of Rail Travel, Keighley • The Peace Museum, Bradford City Centre • Keighley Bus Museum, Keighley • Brontë Parsonage Museum, Haworth, Keighley • Ilkley Toy Museum, Ilkley
Gallery	<ul style="list-style-type: none"> • Cartwright Hall Art Gallery, Bradford • Salts Mill Art Gallery, Saltaire • Impressions Gallery, Bradford City Centre • The Bingley Gallery, Bingley • Aire Sculpture Trail, Shipley
Theatre	<ul style="list-style-type: none"> • Alhambra Theatre, Bradford City Centre • St George's Hall, Bradford City Centre • Bradford Playhouse, Bradford City Centre • The Studio, Bradford City Centre • King's Hall & Winter Garden, Ilkley

8.9.5 As Table 8.10 above shows, it is unsurprising that Bradford City Centre is identified by some 50.4% of the study area population as their preferred destination to participate in cultural activities. This because the centre benefits from a range of museums and theatres of national significance including the National Science and Media Museum, the Alhambra Theatre and St George's Hall (which has been closed for major repair and refurbishment for some time and is recently re-opened), amongst other venues. There are also clearly a considerable number of cultural venues outside the city centre boundary but within its immediate vicinity, this includes Bradford Industrial Museum, Cartwright Hall Art Gallery, and Bolling Hall. In terms of the district's town centres, Keighley benefits from three museums, whilst Ilkley contains a theatre, and Saltaire a modern art gallery.

8.9.6 As a major city centre within the Yorkshire region, it is considered that Bradford sustains a good number of cultural facilities for its size. The household survey identifies that facilities within the city centre draw from a large area and that Bradford is a key destination for cultural activities in the study area. Furthermore:

- additional/improved cultural facilities have not been identified by household survey respondents as a measure that would encourage them to visit Bradford City Centre more frequently; and
- less than 1% of household survey respondents in the study stated that they would like to see more theatres, museums and art galleries within Bradford.

8.9.7 Accordingly, the study does not consider that there is a current pressing requirement for new cultural facilities in Bradford City Centre. However, in order to maintain and improve current participation rates, and help increase the number of visitors to the venues/area, consideration should be given to ways of further promoting existing facilities and improving marketing.

8.9.8 In terms of existing cultural facilities in the other towns in Bradford district, it is considered that existing provision is of a scale which is appropriate to their role in the hierarchy. Demand/need for additional provision is likely to be limited due to the location of existing more comprehensive cultural facilities in the sub-regional centre of Bradford. It is recommended that, should any proposals for arts and cultural development be forthcoming, they are judged on their own merit in accordance with relevant town centre planning policy at the time of an application's submission.

9.0 Key Findings and Policy Recommendations

9.1 Introduction

- 9.1.1 This Study has been undertaken to establish current provision and future needs in the retail and commercial leisure sectors within Bradford District over the plan period. The Council's previous evidence base in respect of retail and leisure needs was published in 2013, and previous to that in 2008. Given the time that has elapsed since the previous study was produced, it was considered appropriate to undertake an entirely new study based on up-to-date survey data.
- 9.1.2 In addition, this Study provides additional recommendations in respect of other potential policy guidance required to help support the future growth, improvement and regeneration of the defined town, district and local centres, along with providing a list of recommended sites to meet the identified quantitative need for town centre uses, having regard to market deliverability factors, town centre hierarchy and national planning policy.
- 9.1.3 Bradford District has a series of up-to-date policies and strategic guidance to help realise the overall aspirations to improve centres and particularly Bradford City Centre and Shipley Town Centre. Furthermore, a partial review of the Bradford Core Strategy DPD and the development of the Site Allocations DPD are currently underway.
- 9.1.4 The purpose of this section therefore, is to set out the key findings from each of the elements of the Study, from both a quantitative and qualitative need perspective, and provide recommendations on appropriate policy responses for the partial review of the Core Strategy to address the key issues raised in the research.
- 9.1.5 This section starts with an assessment of the key findings in respect of retail need within the district, having regard to the current market share claimed by destinations in the district but also specifically within the city and town centre. The analysis then turns to consider how the Council should plan for any future growth in convenience and comparison floorspace. The second part of this section sets out the recommendations in terms of policy objectives to help guide future town centre policies and how these will assist in shaping the defined centres in the future to meet residents' needs.

- 9.1.6 It is useful to set out at this juncture the national policy guidance in respect of ensuring the vitality of town centres. Paragraph 85 of the NPPF indicates that local planning authorities 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.
- 9.1.7 The national policy position has informed the Study and its requirements which, where relevant, are considered in relation to Bradford District below.

9.2 Key Findings: Quantitative Need

- 9.2.1 Section 7.0 of the Study sets out the full assessment of the quantitative capacity for additional floorspace in Bradford District across the study period. This assessment provides floorspace capacity figures based on a series of assumptions and estimated forecasts over the short, medium and long term.

- 9.2.2 As set out in the Study, longer term growth rates and capacity estimates should be treated with caution given the inherent uncertainties of predicting the economy in the future, particularly at the time of writing. For example, spending on convenience goods on a yearly basis has decreased per person in recent years, with a similar trend set to continue over the next ten years or so. On average following the recession, households chose to cut back on convenience goods spending, and at the same time increase spending on comparison goods. This is partly explained by the fact that prices of convenience goods have continuously risen, while those of comparison goods saw little growth and therefore by consuming fewer convenience goods, some households had more money available to spend on comparison goods. Furthermore, the squeeze on household incomes continues, along with inflation remaining above wage growth, resulting in retail spending remaining on a slower growth trajectory.
- 9.2.3 Based on the current retention rates within Bradford District, there is no quantitative requirement identified for any additional convenience goods floorspace within Bradford District's catchment up to 2034 once existing commitments are considered.
- 9.2.4 In terms of comparison goods floorspace requirements, again based on a constant market share across Bradford District, it has been identified that by 2029, there will be 10,300 sq.m of comparison goods floorspace required, increasing to 13,100 sq.m by 2030. In the longer term, a requirement for 24,800 sq.m by 2034 has been identified. However, this longer-term quantitative need figure should be treated with utmost caution and will need review as changed circumstances emerge.
- 9.2.5 Reflecting the uncertainty in forecasting long-term retail trends and that UK retailing continues to evolve, the revised NPPF has removed the requirement for local plans to meet identified needs 'in full' over the local plan period under the previous version. The NPPF states at paragraph 85 that planning policies should '*...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...*'. Policies therefore only need to look at least ten years and not necessarily over the full plan period when allocating sites to meet the 'likely' need for town centre uses.
- 9.2.6 It is therefore recommended that the Council look to accommodate the requirement for 10,300 sq.m by 2029 within the plan period. It is important to emphasise that this would equate to just over 1,000 sq.m of comparison goods floorspace per annum, which is not a particularly considerable amount in the context of Bradford district's wide network of city, town, district and local centres.

9.2.7 Looking at the capacity in Bradford City Centre and the four town centres in Bradford District of Bingley, Ilkley, Keighley and Shipley on an individual basis, the study identifies following capacities for additional comparison goods floorspace in the period up to 2029:

- Bradford City Centre: 3,500 sq.m (net)
- Keighley Town Centre: 1,700 sq.m (net)
- Ilkley Town Centre: 500 sq.m (net)
- Bingley Town Centre: none
- Shipley Town Centre: none

9.2.8 Individual capacity assessments for Bradford City Centre and each of the four town centres in Bradford District provide an indication of the most appropriate centres to direct the new comparison retail development. However, it is essential that the findings of the individual centre capacity assessments are considered in the context of the overall district wide requirement for new comparison retail floorspace. Any future allocations proposed via the plan making process should follow the 'town centre first' approach, in line with national planning policy. It will further be important for the Council to consider the potential contribution of existing vacant floorspace and emerging schemes, specifically, the proposed Aire Valley Retail Park scheme on the East Parade site in Keighley.

9.2.9 In this respect, it is considered that Bradford City Centre and Keighley Town Centre should be the focus for new comparison retail floorspace in Bradford District. It is not considered necessary for the Council to plan for the delivery of further comparison goods floorspace over the plan period in Ilkley, Bingley and Shipley Town Centres where no or relatively small requirement for new comparison goods floorspace has been identified.

9.3 Key Findings: Qualitative Need

9.3.1 In assessing the potential qualitative need for additional retail provision, whilst this is a more subjective matter, there are important factors to consider when reviewing the existing provision within the administrative area. Issues such as 'gaps' in existing provision, ensuring that communities have easy access to retail facilities and that there is a range of operators to provide choice to residents, along with location specific needs such as higher levels of deprivation, all need to be taken account of when assessing the qualitative need.

9.3.2 As set out in detail above, the study has not identified any quantitative capacity for additional convenience floorspace across the Bradford District, once committed convenience

floorspace has been taken into account. This is principally due to the commitments for new foodstores in the district including Lidl in Bingley (now open), and the proposed Lidl at Eccleshill Retail Park in Bradford, Aldi in Thornbury in Bradford, and Lidl at New Bolton Woods in Bradford.

- 9.3.3 Notwithstanding the quantitative position, qualitative need is also an important consideration and is a more subjective matter. For example, issues such as gaps in provision, ensuring that communities have easy access to retail facilities, and that there is a range of operators to provide choice to residents need to be taken into account. This is summarised in relation to each centre below based on the detailed analysis contained at Section 7 of the Report.

Bradford City Centre

- 9.3.4 In relation to convenience goods, Section 7 of this report has explained that following the closure of Morrisons on Westgate in 2016, there is now no large foodstore (with over 1,500 sq.m of net floorspace) located within the city centre. A large foodstore in the city centre would deliver significant qualitative benefits, enabling residents to access a comprehensive range of convenience products and generating increased footfall and activity through linked trips.
- 9.3.5 However, it is envisaged that the potential for the Council to attract such investment is likely to be very limited over the plan period, given existing out-of-centre foodstore provision surrounding the city centre and the current retail climate. In the convenience sector, the focus for Bradford City Centre should therefore be on delivering the replacement of Oastler Market with the proposed new market building at Darley Street. With the introduction of this facility Bradford City Centre will be able to offer an extensive independent food offer within its markets which is distinct to that available within surrounding large foodstores. This could act to set the centre apart from mainstream out-of-centre convenience retail competitors and is likely to act as a destination and footfall driver in its own right.
- 9.3.6 Turning to comparison goods, the 2013 Retail Study identified a significant qualitative need to improve the comparison goods provision within the city centre through the delivery of the Broadway Shopping Centre. This has since taken place and the review of shopping patterns at Section 5 shows that it has delivered a marked improvement in the performance of the clothing and footwear offer in Bradford City Centre. Accordingly, there is no immediate qualitative requirement to improve the comparison offer within the city centre. Furthermore, it is noted that there are some vacant units remain in The Broadway and, as such, there are opportunities to further enhance the centre's comparison goods offer via existing in-centre stock.

Keighley Town Centre

- 9.3.7 Keighley benefits from a range of large-scale convenience retail facilities within and immediately surrounding its town centre, and the findings of the quantitative need assessment suggests that these stores are collectively trading above benchmark levels. The healthy trading position of these town centre 'anchor' stores should be supported and should not necessarily be viewed as available 'capacity' to accommodate further out-of-centre provision.
- 9.3.8 'Over-trading' at town centre stores represents an issue where it is causing operational problems for the store's users (i.e. insufficient stock, high levels of queuing at checkouts, parking capacity problems). No such issues were identified during the visits to the centre. Moreover, the centre already benefits from substantial provision in the form of three of the 'big four' operators and two leading discounters.
- 9.3.9 The Council does not therefore need to actively plan for the delivery of new convenience floorspace in Keighley from a qualitative perspective. It is however recommended that the Council supports the delivery of new convenience floorspace within the town centre, which would alleviate any future potential for overtrading to become an acute problem within existing stores.
- 9.3.10 Turning to comparison goods floorspace, the health check of Keighley Town Centre identified that the proportion of comparison retail provision is broadly in line with the UK average. However, the clothing and footwear provision is below the UK average in terms of both the proportion of outlets and floorspace. Keighley Town Centre benefits from a large catchment population and remains an important comparison-shopping destination for the district, second only to the city centre. Accordingly, delivery of the East Parade site to include modern large floorplate retail units should remain an important priority for the Council.

Ilkley Town Centre

- 9.3.11 In terms of convenience goods, the analysis at Section 7 has explained that Ilkley Town Centre has lost market share and its role as a convenience goods shopping destination has diminished notably since the last Retail Study in 2013. This is largely down to the introduction of new Aldi stores in both Silsden and Guiseley, which has facilitated more sustainable shopping patterns for these respective settlements (and those living in Addingham and Burley in Wharfedale) but in turn has reduced Ilkley's influence as a convenience goods shopping destination across what was previously a large rural catchment area.

- 9.3.12 Despite this reduction in market share, it must be acknowledged that provision in Ilkley remains appropriate for its role and function. This includes two large foodstores (Tesco and Booths), an M&S foodhall, and smaller Co-op. The capacity work also shows that this existing provision is trading substantially below benchmark levels. The only deficiency in Ilkley's convenience offer is the lack of a discount foodstore and it is evidently this omission which has made some shoppers turn to facilities in Silsden and Guiseley.
- 9.3.13 Overall, despite the notable reduction in Ilkley's market share since the last Retail Study, it is considered that there is no overriding qualitative need for the Council to actively plan for the delivery of new convenience floorspace. This is given that the centre already benefits from a range of foodstores and the capacity analysis suggests that these are more than meeting expenditure demand (i.e. they are trading below benchmark).
- 9.3.14 With regards comparison goods, the health check of Ilkley Town Centre found that the overall quantity and breadth of comparison retail provision is well above the level expected for its role and function. It is evidently meeting the comparison-goods shopping needs of its residents. Therefore, there is no qualitative requirement to improve the comparison offer within Ilkley Town Centre.

Shipley Town Centre

- 9.3.15 The appraisal of Shipley's convenience goods offer suggests that it provides a reasonable choice of main food stores for a centre of its size. There is also a range of large foodstores within the surrounding area. The household survey shows that the town centre's Asda store is particularly dominant and therefore additional convenience provision within Shipley Town Centre would deliver qualitative benefits by increasing choice and competition in the centre.
- 9.3.16 The proposed Airedale Valley scheme in Shipley, which will include a discount foodstore and potentially another smaller foodstore, will improve the choice of foodstore operators available locally and is therefore expected to address this qualitative deficiency. Therefore, there is no need for the Council to actively plan for the delivery of new convenience floorspace to serve the settlement more widely.
- 9.3.17 In regard to comparison goods floorspace, Shipley Town Centre is an important local non-food shopping destination for the residents of Shipley and neighbouring Baildon, and appears to meet basic day-to-day comparison goods needs. The proposed Airedale Mills scheme in Shipley will include either one or two non-food retail units which, along with the comparison goods offer encompassed within the proposed foodstore on the site, will significantly improve the comparison goods offer available locally.

- 9.3.18 Nevertheless, drawing more comparison goods retailers to Shipley Town Centre would benefit its overall vitality and viability, and opportunities to increase and diversify the comparison goods offer in the centre should therefore be supported. However, in pursuing this objective, it is important to note that there are already several relatively large vacant units within the centre and the main priority should therefore be to encourage the re-occupation or redevelopment of these vacant units.

Bingley Town Centre

- 9.3.19 Bingley Town Centre has witnessed a dramatic increase in its convenience goods market share since the last Retail Study, as a consequence of the introduction of an Aldi foodstore and Sainsbury's Local store. A new Lidl store also opened in May 2019 (post-dating the household survey) and this will further improve local consumer choice and the centre's convenience goods market share. It is not therefore considered that there is any qualitative need for the Council to actively plan for the delivery of further new convenience floorspace in Bingley.
- 9.3.20 Turning to comparison goods, the analysis at Section 7 has explained that the centre provides a reasonable offer which meets the basic non-food shopping needs of Bingley's residents. The additional offer provided within the recently opened Lidl store will have delivered a small increase in the comparison offer available locally. The attraction of more comparison goods retailers to the centre would benefit its overall vitality and viability and should be supported, although there is no need for the Council to plan actively for the delivery of this.

9.4 Retail Strategy for the City and Town Centres

- 9.4.1 It is important to note the current commercial market and the types of operators who are actively seeking to expand their portfolio (the discount end of the market, i.e. Aldi and Lidl). Should either retailer seek additional presence in Bradford District, and particularly in proximity to Bradford City Centre, Ilkley or Shipley, any proposal should be directed in the first instance to the defined centres in accordance with planning policy. However, it is not considered appropriate to specifically allocate sites for additional convenience floorspace within the local plan given the uncertainties in the commercial market and lack of identified quantitative need, and instead should applications be forthcoming, they can be assessed against the relevant local and national planning policies.

Bradford City Centre

- Delivery of the new Darley Street Market Hall provides the greatest potential to qualitatively improve the convenience role of Bradford City Centre and support the vitality and viability of the centre. Relocation of the market into the heart of the primary shopping area and in proximity of the Broadway and Kirkgate Shopping Centres will concentrate retail and service uses in this area, reduce vacancy in the centre and increase footfall through linked trips between the Darley Street Market and other city centre destinations. This should be a key priority for the Council.
- The 2013 Retail Study identified a significant qualitative need to improve the comparison goods provision within the city centre. This has been achieved through the delivery of the Broadway Shopping Centre, which has delivered modern format units that will ensure that retailers continue to invest in the city centre. Accordingly, there is no immediate qualitative requirement to improve the comparison offer within the city centre.
- A particular issue is that there are notable levels of vacancy across the centre, although this is partly due to the influx of new space provided by the Broadway centre. This includes 11 high quality modern units (totalling approx. 1,200 sq.m). The former TJ Hughes building, which totals 10,000 sq.m, is also vacant. There is also approximately 1,400 sq.m of vacant retail floorspace in the city centre's Kirkgate Shopping Centre.
- The take up of The Broadway's modern units and the re-use of existing vacant units elsewhere in the centre should be the focus for identified expenditure capacity (particularly comparison goods expenditure). The Council should support the re-occupation and/or redevelopment of existing units within the primary shopping area for modern floorspace, rather than the development of new floorspace in edge-of-centre or out-of-centre sites.
- Indeed, the vacant floorspace within Bradford City Centre will sufficiently meet identified comparison goods expenditure capacity in the short to medium-term.
- However, this position should continue to be monitored on a frequent and regular basis. The Council are already taking steps to address the inevitable organic changes following the Broadway development and these should be welcomed and continue to be pursued, identifying new deliverable opportunities wherever possible.

Keighley Town Centre

- Keighley benefits from a range of large-scale convenience retail facilities within and

immediately surrounding its town centre. The Council does not therefore need to actively plan for the delivery of new convenience goods floorspace in Keighley.

- Keighley Town Centre's clothing and footwear provision is below the UK average in terms of both the proportion of outlets and floorspace. It benefits from a large catchment population and remains an important comparison-shopping destination for the district, second only to the city centre. It is therefore considered that there is potential to attract additional operators if the right type of properties in the right locations – modern large floorplate units in prime town centre location – were these to become available.
- In terms of accommodating this enhanced offer, whilst there are a notable proportion of vacant units in Keighley Town Centre, many are relatively small, and the overall proportion of vacant units is only slightly above the UK average. There is one large vacant retail unit in the centre, the former M&S unit in the Airedale Shopping Centre of approximately 1,400 sq.m (GIA).
- There is quantitative expenditure capacity to support the enhancement of the centre's comparison goods offer, with a district-wide requirement for 11,300 sq.m of additional comparison floorspace over the medium-term, to 2029. Based on Keighley's role, function and attraction as a comparison-goods shopping destination it is considered that a sizable proportion of this floorspace should be focussed upon the centre.
- The emerging East Parade development has the potential to absorb much of the quantitative capacity for additional comparison floorspace over the period to 2029 and beyond. Current plans are for approximately 5,400 sq.m of retail floorspace at ground floor level, with additional floorspace potentially at mezzanine, albeit a planning application has yet to be submitted.

The East Parade development site represents an important priority for the enhancement of Keighley's comparison goods sector, and the study recommends that the site is allocated as such. However, it will be important that any scheme is well related to the town centre and complements rather than competes with the existing offer to ensure that the future development of the site supports vitality and viability.

Ilkley Town Centre

- Despite a reduction in the town centre's convenience goods market share since the last Retail Study, provision in Ilkley remains appropriate for its role and function as it includes four foodstores.
- Existing convenience provision was also found to be trading below benchmark levels.

The main identified deficiency in Ilkley's convenience offer is the lack of a discount foodstore and it is evidently this omission which has made some shoppers turn to facilities in Silsden and Guiseley – thereby reducing the centre's market share.

- Despite the reduction in convenience goods market share, it is considered that there is no overriding need for the Council to actively plan for the delivery of new convenience floorspace in Ilkley. This is given that the centre already benefits from a range of foodstores and these are more than meeting expenditure demand (i.e. they are trading below benchmark).
- With regards comparison goods, Ilkley Town Centre has an overall quantity and breadth of comparison retail provision which is well above the level expected for its role and function. It is evidently meeting the comparison-goods shopping needs of its residents. Therefore, there is no qualitative requirement to improve the comparison offer within Ilkley Town Centre.
- Notwithstanding this, given the historic nature and quality of the local built environment, no suitable and available redevelopment sites were identified which could provide new major retail development either within or on the edge of the town centre.

Shipley Town Centre

- Shipley's convenience goods offer provides a reasonable choice of main food shopping destinations for a centre of this size. There is also a range of large foodstores within the surrounding area.
- The household survey shows that the town centre's Asda store is the dominant destination and trades above average levels. Additional, smaller-scale convenience provision within Shipley Town Centre would therefore deliver qualitative benefits by increasing choice and competition.
- It is not considered that the Council needs to plan actively for the delivery of new convenience floorspace to serve the settlement more widely, this particularly given that an Aldi foodstore is already committed to the south as part of the New Bolton Woods residential development.
- In regard to comparison goods floorspace, Shipley Town Centre is an important local non-food shopping destination for the residents of Shipley and neighbouring Baildon, and appears to meet basic day-to-day comparison goods needs.
- Attracting additional comparison goods retailers to the centre would benefit its overall

vitality and viability, and opportunities to increase and diversify the comparison goods offer in Shipley should therefore be supported.

- In pursuing this objective, it is important to note that there are already several relatively large vacant units within the centre and the main priority should therefore be to encourage the re-occupation or redevelopment of these vacant units.

Bingley Town Centre

- Since the last Retail Study in 2013, Bingley Town Centre has benefitted from the introduction of an Aldi and a Sainsbury's Local store, its convenience goods offer and market share has therefore witnessed a dramatic increase and is set to increase further with the recent opening of an in-centre Lidl store. There is therefore no qualitative need for the Council to actively plan for the delivery of further new convenience floorspace within Bingley.
- With regards comparison goods, the centre provides a reasonable offer which meets the basic non-food shopping needs of Bingley's residents and this has been recently enhanced by the non-food offer contained within the Lidl store.
- The attraction of more comparison goods retailers to the centre would benefit its overall vitality and viability and should be supported, although there is no need for the Council to actively plan for the delivery of this.

9.5 Key Findings: Commercial Leisure

9.5.1 The following key conclusions and recommendations were identified in relation to the following leisure uses.

Cinema

9.5.2 Based on current supply and demand evidence, it is not considered that there is any need for the Council to consider a positive policy approach to deliver new cinema provision in the district over the plan period, as the current provision is adequately meeting local demand. This is consistent with the advice provided as part of the Bradford Retail Study Update in 2013, and reflects the fact that since this study a new six-screen cinema has opened in Bradford City Centre ('The Light') and an independent single screen cinema has opened in Ilkley Town Centre (Ilkley Cinema). In the event that a planning application should come forward for a further cinema facility in the district, it should be judged on its own merits in accordance with the relevant town centre planning policy at the time of an application's submission.

Ten-pin Bowling

- 9.5.3 The analysis at Section 8 shows that the available population within the study area could theoretically sustain 48 bowling lanes to the end of the plan period. Bradford district's two existing bowling alleys currently provide a combined 40 bowling alleys. It would therefore appear based on the capacity assessment that provision meets demand with a small additional surplus.
- 9.5.4 Large-scale ten-pin bowling facilities like Hollywood Bowl in Bradford City Centre accommodate between 25 and 30 lanes. A further facility of this scale is therefore unlikely to be capable of being supported. However, the surplus of 7 to 9 lanes would lend itself to the provision of a smaller 'boutique' bowling facility within an existing defined centre, perhaps as part of a wider evening economy offer.
- 9.5.5 Overall, it is not recommended that the Council plans positively to accommodate a further bowling alley to serve the district, but should respond to any business opportunities that may be presented should an operator come forward, particularly if a qualitatively different concept of an appropriate scale is being advanced. Should any proposals for such development be forthcoming, they are judged on their own merit in accordance with relevant town centre planning policy at the time of an application's submission.

Bingo

- 9.5.6 Based on the quantitative and qualitative analysis of the existing bingo provision in Bradford, the four facilities appear sufficient to meet the low participation rates identified in the household survey. If a new facility were to come forward, it would be important to offer a qualitatively different format to that which is already provided by the Buzz bingo halls, in a suitable and sustainable location. The study recommends that, if demand arises in the future, proposals for such development are judged on their own merit in accordance with relevant town centre planning policy at the time of an application's submission.

Health and Fitness

- 9.5.7 The quantitative analysis at Section 8 has highlighted that the majority of those within the Study Area who visit health and fitness facilities use the provision provided within the Bradford authority area. From an audit of available facilities, it is also evident that this offer is appropriately distributed throughout Bradford's key settlements (likely a reflection of consumer demand). As such, from a quantitative and qualitative perspective it can be said that Bradford is relatively well provided for in terms of indoor health and fitness facilities.

- 9.5.8 Whilst there does not appear to be a pressing need to allocate additional land for such leisure uses, it is considered that proposals for new health and fitness provision should be considered positively, provided that they are in accordance with the provisions of the development plan and national planning policy.

Restaurants

- 9.5.9 The 2019 household survey shows that restaurants within Bradford district as a whole retain 56.4% of all trips made by restaurant goers in the study area, and this represents a reduction of 5% when compared to the position in the 2012 household shopper survey. The main reason for this is the fact that Leeds Trinity has boosted the market share of Leeds city centre as an 'eating out' destination for residents of the study area. This has reduced Bradford City Centre's overall market share in this sector, or at the very least has left it static.
- 9.5.10 In terms of how the city centre might respond to this, planning permission was granted on the site of the former Royal Mail sorting office (Forster Court) for a mixed-use development comprising cinema and eight family restaurants in October 2016. The site has since been cleared and a series of planning conditions discharged. However, there has been no progress with the scheme's construction over the past two years.
- 9.5.11 The Foster Court site should be able to represent a good opportunity to introduce a wider range of modern format restaurant units to Bradford City Centre, which would appeal to national multiple operators should the market bring the site forward. The council's forthcoming plans for a new market hall on Darley Street could also help in this regard as it will contain a hot food offer. Accordingly, there is scope to enhance the overall restaurant offer within Bradford City Centre and pipeline developments would appear to be forthcoming over the Plan Period to aid this.
- 9.5.12 Turning to town and district centres, market share evidence and health checks have identified an adequate distribution of restaurants catering for a variety of tastes across the study area's larger centres. Given this evidence and the nature of the restaurant sector more widely, there is no overriding quantitative or qualitative need to plan positively for additional restaurants to serve any particular town or district centre. However, further in-centre provision which would diversify the current offer, particularly in Keighley, Shipley, Ilkley and Bingley should be supported where this accords with the provisions of the development plan.

Pubs/Bars

- 9.5.13 In a similar vein to 'eating out', Bradford's market share of pub/bar visits from those residing within the study area appears to have reduced by 4.7%, from the 2013 position of 19.9%. This again can be attributed to the influence of Trinity Leeds, with its market share having increased by a broadly comparable level.
- 9.5.14 In response, the city centre proposals such as those for the former Royal Mail sorting office (Forster Court) could introduce night-time economy uses alongside restaurant provision, or indeed the restaurants themselves could stimulate investment in supporting bars/pubs elsewhere in the city centre based on the additional footfall generated. The council's forthcoming plans for a new market hall on Darley Street could equally have the same effect, as this will include a hot food offer that may also help support the evening economy. As such, there is scope to enhance the overall pub/bar offer within Bradford City Centre, which will begin to address the market share lost to Leeds since the opening of Trinity.
- 9.5.15 Turning to town and district centres, these are considered to be relatively well served by traditional pubs and, in the case of Ilkley, Bingley and Keighley in particular, by more modern independent bars which diversify this leisure offer. Accordingly, it is not considered that there is any clear quantitative or qualitative justification to plan for additional facilities to serve the district's centres. Notwithstanding this, it is considered that further facilities to support the evening leisure economies across Bradford's centres should be supported where these are in line with local and national planning policies.

Art and Cultural Facilities

- 9.5.16 As a major city centre within the Yorkshire region, Bradford sustains a good number of cultural facilities for its size. The household survey identifies that facilities within the city centre draw from a large area and that Bradford is a key destination for cultural activities in the study area. Accordingly, it is not considered that there is a current pressing requirement for new cultural facilities in Bradford City Centre. However, in order to maintain and improve current participation rates, and help increase the number of visitors to the venues/area, consideration should be given to ways of further promoting existing facilities and improving marketing.
- 9.5.17 With regards existing cultural facilities in the other towns in Bradford district, existing provision is considered to be of a scale which is appropriate to their role in the hierarchy. Demand/need for additional provision is likely to be limited due to the location of existing more comprehensive cultural facilities in the sub-regional centre of Bradford. It is again

recommended that, should any proposals for arts and cultural development be forthcoming, they are judged on their own merit in accordance with relevant town centre planning policy at the time of an application's submission.

9.6 Policy Recommendations: Previous Designation of Odsal as a New District Centre

- 9.6.1 The Core Strategy (Policy EC.5) allocated a new district centre at Odsal, to the south of the city centre, in recognition of its re-development potential for 'main town centre' uses that would serve a sizable new residential allocation to the south of the city. The new centre, on the site of the Richard Dunn sports complex, was to accommodate a major supermarket and a range of services such as banks, building societies and other main town centre uses, alongside a medical centre and bus station.
- 9.6.2 As part of the previous Retail Study in 2013, WYG advised that it was not necessary to allocate a new district centre, but that it would be more appropriate to elevate Bankfoot (Rooley Lane) local centre to a new district centre (to be renamed Odsal district centre if required). The rationale for this was that it would draw on existing infrastructure in a sustainable location. It was advised that the Richard Dunn sports centre site should be brought into the new enhanced Bankfoot (or Odsal) centre, with it being just 100 metres from its southern extremity.
- 9.6.3 As part of the 2013 Study, it was found that qualitative and quantitative need existed for the introduction of a major new foodstore to anchor Odsal district centre. This was in view of the 'over-trading' identified in the major foodstores to the south of Bradford City Centre. As part of this Retail Study, WYG have been asked to revisit this proposed centre allocation and advise whether the scale and form of foodstore previously advocated remains justifiable.
- 9.6.4 Based on the findings of the 2019 quantitative expenditure assessment, it is important to acknowledge that the foodstore performance position has changed somewhat in the study zone in which Odsal district centre would be located (Zone 13).
- 9.6.5 The 'survey derived performance' table of the retail model (see Appendix 3, Table 11) is showing that the stores within Zone 13 are cumulatively 'under-trading' by some -£14.8m. The same also applies to the surrounding closest study zones of 12, 14 and 8, where foodstores are found to be cumulatively under-trading by -£14.4m, -£6.5m and -£17.2m respectively.

- 9.6.6 Furthermore, when the two closest major foodstores to the Odsal site are examined (both within a 5-minute drive) – these being Morrisons, Mayo Avenue and Asda, Rooley Lane – it is clear from the foodstore performance analysis (Appendix 3, Table 11) that they are cumulatively trading at some -£15.9m below benchmark level.
- 9.6.7 Having regard to this evidence, it would appear that there is no longer a quantitative need case to support a major foodstore as part of a new district centre at Odsal. Whilst this represents a change in advice from the previous study, it is important to acknowledge that the convenience retail market has changed considerably since 2013. Convenience goods expenditure growth rates are increasingly pessimistic, and this must be set in the context of the site being located within a part of Bradford that already contains a considerable number of major foodstores (particularly in its urban core). Over the past five years, this offer has also been supplemented by an increased number of discount foodstores in urban Bradford, which have cumulatively reduced the market share of the large superstores operated by the 'big four' operators.
- 9.6.8 In summary, the recommendation is that there is no longer quantitative need to support a major foodstore as part of Odsal district centre and accordingly the study does not consider there to be merit in combining Bankfoot local centre and the Richard Dunn sports centre to create a centre boundary of a scale that could accommodate such a facility.

9.7 Policy Recommendations: Defined Centre Boundaries

- 9.7.1 The Council with relevant support from WYG have reviewed all the existing town centre boundaries for Bradford City Centre and the four town centres of Keighley, Ilkley, Shipley and Bingley as defined in the Proposal Maps accompanying the Bradford City Centre AAP, the Shipley and Canal Road Corridor AAP, and the Bradford Replacement Unitary Development Plan. The recommendations in respect of the city and town centres are set out below.
- 9.7.2 In recommending appropriate boundaries, the following definitions provided in the NPPF have taken into account:
- **Primary Shopping Area** – Defined area where retail development is concentrated.
 - **Town Centre** – 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 development, comprising or including main town centre uses, do not constitute town centres.

- **Main Town Centre Uses** – 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).

Bradford City Centre

- 9.7.3 A plan showing the boundary recommendations in respect of Bradford City Centre is provided at Appendix 1 of Volume 2 of this study.
- 9.7.4 The centre boundaries for Bradford City Centre are identified in the City Centre Area Action Plan Proposals Map, which was adopted in 2017. The Proposals Map defines a city centre AAP boundary (which is taken to be the city centre boundary) and a primary shopping area along with primary and secondary frontages for Bradford City Centre. Following a review of these boundaries, it is considered that the adopted city centre boundaries remain largely accurate and appropriate, reflecting the short time since their adoption.
- 9.7.5 One recommendation is that the development site off Lower Kirkgate, between Forster Court and the Midland Hotel is excluded from the primary shopping area boundary and the secondary frontage designation removed. This site is currently vacant and there is no current proposals for the development of this site for retail or service uses (the proposed Forster Square Leisure scheme is adjacent to this site).
- 9.7.6 Given the Council's plans for the relocation of Oastler Market and the redevelopment of the existing Oastler Market site for residential uses, it is further recommended that the primary shopping area boundary is reviewed in due course, to ensure it remains consistent with the users present.

Keighley Town Centre

- 9.7.7 A plan showing boundary recommendations in respect of Keighley Town Centre is provided at Appendix 2 of Volume 2 of this study.
- 9.7.8 The centre boundary for Keighley Town Centre remains as identified in the Bradford Replacement Unitary Development Plan, which was adopted in 2005.

- 9.7.9 It is noted that the previous version of the NPPF recommended that local authorities additionally define primary and secondary frontages and set policies that make clear which uses will be permitted in such locations. However, this policy requirement is deleted from the revised version of the NPPF. The Ministry for Housing, Communities and Local Government has confirmed that the deletion of this requirement is to encourage a more positive and flexible approach to planning for the future of town centres due to the rapid changes taking place in the retail and leisure industries. However, the removal does not preclude local planning authorities from identifying primary and secondary shopping frontages where their use can be justified.
- 9.7.10 Following on from this, in accordance with the NPPF, it is considered that there is no benefit in defining primary and secondary frontages in Keighley Town Centre. The health check identified that the town centre encompasses a diverse mix of uses. Whilst retail uses are focused within the Airedale Shopping Centre and Cavendish Retail Park, the property offer and nature of the centre means that outside of these areas, retail and service uses are relatively mixed. The independent offer and mix of uses in Keighley Town Centre contribute significantly to the overall distinctiveness and vibrancy of the centre. It is therefore considered that the take up of vacant units by a diverse mix of retail and service uses should be encouraged across the centre to help maintain its vitality and viability.
- 9.7.11 With this in mind, it is recommended that the Council considers extending the primary shopping area in Keighley to include further mixed retail and service use areas of the centre and the anchor foodstores which are currently edge-of-centre in retail planning policy terms. This will ensure that this important town centre provision is protected under the NPPF impact test.
- The Sainsbury's supermarket, and the Iceland and Aldi stores;
 - Units on the north side of East Parade, west of the access for Cavendish Retail Park;
 - The Morrisons supermarket;
 - Along the north side of High Street, east of Chapel Lane.
 - On the east side of North Street, south of the Town Hall square;
 - The units on the east side of Cooke Street and on the south side of Cavendish Street;
and
 - The retail and service units on Lawkholme Lane.

Ilkley Town Centre

- 9.7.12 A plan showing boundary recommendations in respect of Ilkley Town Centre is provided at Appendix 2 of Volume 2 of this study.
- 9.7.13 The centre boundary for Ilkley Town Centre remains as identified in the Bradford Replacement Unitary Development Plan Proposals Map, which was adopted in 2005. It is recommended that the defined town centre boundary is extended to encompass the whole of the Booths site, which not wholly included within the existing boundary.
- 9.7.14 As for Keighley Town Centre, it is considered that there is no benefit in defining primary and secondary frontages in Ilkley Town Centre. The health check identified that the town centre encompasses a diverse mix of uses with no single main shopping street. Whilst retail uses are focused on Brook Street and The Grove, the compact nature of the centre and property offer means that the location of retail and service uses is relatively mixed across the centre. The mix of uses and strong leisure offer in Ilkley Town Centre contribute significantly to the distinctiveness and vibrancy of the centre. As for Keighley, it is therefore considered that the take up of vacant units by a diverse mix of retail and service uses should be encouraged within the centre to help maintain its vitality and viability.
- 9.7.15 It is recommended that the primary shopping area in Ilkley is extended to encompass the more mixed retail and service use areas of the centre to ensure the retail uses in these areas remain policy protected under the town centre first approach. The recommended primary shopping area should include the mixed retail and service uses located:
- Within The Moors Shopping Centre and adjacent retail and leisure uses along Church Street;
 - Along Crescent Court and Leeds Road, west of the junction with Nile Road;
 - On the south side of The Grove, east of Parish Ghyll Road; and
 - On the south side of Station Road, west of the Midland Hotel, and on Wells Road.

Shipley Town Centre

- 9.7.16 A plan showing boundary recommendations in respect of Shipley Town Centre is provided at Appendix 2 of Volume 2 of this study.
- 9.7.17 The centre boundaries for Shipley Town Centre are identified in the Shipley and Canal Road Corridor Area Action Plan Proposals Map, which was adopted in 2017. The Proposals Map defines a town centre boundary and primary shopping area for Shipley Town Centre.

- 9.7.18 Following a review of these boundaries, it is considered that the adopted town centre boundary remains robust. For the primary shopping area, the boundary is recommended to extend and encompass the mixed retail and service areas on Commercial Street and Briggate to ensure the policy protection of the retail uses in these areas under the town centre first approach.
- 9.7.19 It is considered that there is no benefit in defining primary and secondary frontages in Shipley Town Centre given the small size of the centre and mixed nature of the retail and service uses within the centre. A diverse mix of retail and service uses should be encouraged across the centre to help maintain its vitality and viability.

Bingley Town Centre

- 9.7.20 A plan showing boundary recommendations in respect of Bingley Town Centre is provided at Appendix 2 of Volume 2 of this study.
- 9.7.21 The centre boundary for Bingley Town Centre remains as identified in the Bradford Replacement Unitary Development Plan Proposals Map, which was adopted in 2005. It is recommended that the defined town centre and primary shopping area boundaries are extended to encompass the whole of the Aldi and Lidl store sites. Both of the stores, which were completed in October 2015 and May 2019 respectively, now function as part of the primary shopping area, but are not wholly included within the existing boundaries. The study further recommends that the primary shopping area is extended to include the mixed retail and service uses along the north end of Main Street.
- 9.7.22 It is also considered that there is no benefit in defining primary and secondary frontages in Bingley Town Centre given the small size of the centre and that retail and services uses are mixed across the centre. A diverse mix of retail and service uses should be encouraged within the town centre to help maintain its vitality and viability.

District and Local Centre Boundaries

- 9.7.23 Boundary recommendations in respect of the defined district and local centres in Bradford District are shown in the plans provided at Appendix 3 and 4 of Volume 2 of this study, respectively.

9.8 Recommended Local Impact Threshold

- 9.8.1 In accordance with the requirements of paragraph 89 of the revised NPPF, it is appropriate to identify thresholds for the scale of edge of centre and out of centre retail, leisure and

office development which 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 should be subjected to the sequential test⁴³).

- 9.8.2 The current adopted Policy EC5 of the Core Strategy sets out local thresholds for impact tests at 1,500 sq.m for Bradford City Centre, 1,000 sq.m for Keighley, Shipley, Bingley and Ilkley, 500 sq.m for the district centres and 200 sq.m for the local centres.
- 9.8.3 Based on the findings of the Study and the recommendations provided above with regard to protecting the Bradford District's city, town, district and local centres from trade diversion and further shifts in shopping patterns to out-of-centre floorspace, the study suggests that the impact thresholds set out at Policy EC5 of the Core Strategy should be maintained. The size of Bradford District's centres has not altered materially in the period since the previous retail study in 2013. Accordingly, the trigger points for an impact assessment remain appropriate.
- 9.8.4 However, the study considers it appropriate to qualify the area to which each local impact threshold will apply. It is considered to be appropriate for the higher threshold of 1,500 sq.m for Bradford City Centre to apply district-wide. It is recommended that the lower town centre threshold of 1,000 sq.m apply where the catchment area of the proposal, as agreed by the Council, encompasses Keighley, Ilkley, Shipley and/or Bingley Town Centre.
- 9.8.5 It is also recommended that the threshold of relevance to the district and local centres (i.e. 500 sq.m and 200 sq.m, respectively) 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.
- 9.8.6 Based on the above, it is considered that an impact assessment will be necessary for proposals (including the formation of mezzanine floors) for/or which include retail and leisure developments which are not located within a defined centre where:
- The proposal provides greater than 1,500 sq.m gross of retail and/or leisure floorspace;

⁴³ With the exception (in accordance with paragraph 88 of the NPPF) of small scale rural office proposals and other small scale rural development.

- The agreed catchment area of the proposal encompasses Keighley, Ilkley, Shipley, and/or Bingley Town Centre and the proposal provides greater than 1,000 sq.m gross of retail and/or leisure floorspace;
- The proposal is located within 800 metres of the boundary of a district centre and is greater than 500 sq.m gross; or
- The proposal is located within 800 metres of the boundary of a Local Centre and is greater than 200 sq.m.

9.8.7 Previous and relevant experiences suggests that it will only generally be development of a scale greater than these thresholds which could lead to a 'significant adverse' impact, which could merit the refusal of an application for town centre uses in accordance with the provisions of paragraph 90 of the NPPF.

Glossary of Terms

Capacity	Retail capacity in terms of this report refers to surplus/deficit of expenditure (£m) which represents the difference between the expenditure and turnover of the identified facilities.
Comparison Goods	Comparison goods relate to items not obtained on a frequent basis, these include clothing, footwear, household and recreational goods. A more detailed breakdown of comparison goods categories is provided below.
<i>Chemist Goods</i>	<i>All consumer retail expenditure on prescription and non-prescription drugs, adhesive and non-adhesive bandages, first-aid kits, hot-water bottles, toilet shops, sponges, and so on.</i>
<i>Clothing & Footwear</i>	<i>All consumer retail expenditure on shoes and other footwear, garments for men, women, children and infants either ready-to-wear or made-to-measure, underwear, ties, handkerchiefs, scarves, and so on.</i>
<i>DIY Goods</i>	<i>Includes all consumer expenditure on hardware, DIY, decorators' supplies and garden centre type goods. This category includes products such as hammers, saw, screwdrivers, wallpaper, plumbing items, floorboards, ceramic tiles, plants, pots, turf for lawns, and so on.</i>
<i>Electrical Goods</i>	<i>All consumer retail expenditure on domestic electrical and gas appliances, such as washing machines, dryers, dishwashers, ironing and press machines, cookers, freezers and fridge-freezers, coffee makers, radios, televisions, DVD players, and so on.</i>
<i>Furniture Goods</i>	<i>Includes all consumer expenditure on furniture, floor coverings and household textiles such as beds, sofas, tables, cupboards, bed linen, curtains, towels, lamps, mirrors, and so on.</i>
<i>Household Goods</i>	<i>Includes household textiles and soft furnishings, china, glassware, jewellery and other miscellaneous goods such as greeting cards, notebooks, pens, pencils, and so on.</i>
<i>Recreational Goods</i>	<i>All consumer retail expenditure on bicycles and tricycles (excluding toy bicycles), musical instruments, sports equipment, camping equipment, toys of all kinds including dolls, soft toys, and so on.</i>
Convenience Goods	Convenience goods relate to everyday essential items including confectionary, food, drinks, newspapers and magazines.
Town centre	Town 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.
Expenditure Per Capita	The average spend of each person within the defined Study Area on a variety of retail goods.

Expenditure	Expenditure is calculated by taking the population within a defined area and then multiplying this figure by average annual expenditure levels for various forms of goods.
Expenditure Forecasts	This assessment has been undertaken using the 'goods based' approach as prescribed in the Planning for Town Centres Practice Guidance. Retail expenditure forecasts have been derived from Experian Retail Planner Briefing Note 16 (December 2018).
Experian (MMG3)	The database used to identify population, expenditure and socio-economic breakdown of the Study Area population.
Gross Floorspace	Represents the level of total floorspace or footprint of a specific development (i.e. sales area, storage, checkouts, café, display, and so on).
GOAD Plans	Provide accurate information on the composition of town centres, shopping areas, out-of-town retail parks and outlet villages in the UK. Identifies the fascia name, retail category, floorspace, and exact location of all retail outlets and vacant premises.
GOAD Reports	Provide a snap-shot of the retail status or demographic make-up of Goad surveyed town centres. Provides a comprehensive breakdown of floorspace and outlet count for all individual trade types in the Convenience, Comparison, Retail Service, Leisure, Financial/Business Services and Vacancy sectors.
Local Centre	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.
Net Floorspace	Represents the level of internal area devoted to the sale of goods.
Market Share	Market shares derived from the household survey results, which are based on either the proportion of shopping trips or the proportion of expenditure attracted to a particular centre/facility.
National Multiple	This is defined as a retail or service operator which is or part of a network of nine or more outlets.
Price Base	The price base for the study is 2017.
Rates of Productivity	This takes into account the potential for existing retail floorspace to improve their turnover productivity (e.g. smaller goods could be sold from a smaller area for more money, increased opening hours, etc.).
Sales Density	Retail capacity figures are expressed in term of floorspace, relying on the application of assumed sales density figures to the surplus expenditure identified. This is based on the typical turnover of a store by square metre/foot.

Special Forms of Trading	Defined by Experian as expenditure not directed to traditional floorspace such as the internet, mail order, party plan and vending machines and other non-store activity such as market and road-side stalls.
Study Area	This represents the household survey area, which is based on postal sectors.
Trade Draw	This refers to the level of trade attracted to a particular facility/centre from a particular area.
Turnover	The turnover figure relates to the annual turnover generated by existing retail facilities.
Town Centre	A town centre will usually be the second level of centres after city centres and, in many cases, they will be the principal centre of 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.

Bradford Retail and Leisure Study

