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Bradford Retail and Leisure Study

Final Report

ON BEHALF OF BRADFORD METROPOLITAN DISTRICT COUNCIL

October 2026

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1. Introduction

Instruction and Purpose

- 1.1 Nexus Planning has been instructed by Bradford Metropolitan District Council (hereafter referred to as ‘the Council’) to undertake a new Retail and Leisure Study. The primary focus of the Study is to establish the current position in respect of the need for additional retail and leisure facilities in the Bradford authority area, and to consider the vitality and viability of Bradford City Centre, Keighley, Shipley, Ilkley and Bingley town centres (the principal centres in the district). Consideration is also given to the defined district and local centres within the district as part of the overarching commission.
- 1.2 The Study replaces the previous Bradford Retail and Leisure Study, which was authored by WYG on behalf of the Council, and which reported in October 2019. The 2019 Study sought to principally update the capacity findings established in the 2013 Study and provide overarching planning policy recommendations in the then emerging local plan.
- 1.3 The Council is in the process of preparing a new Local Plan for the District for Regulation 19 consultation in Summer 2026. The plan will set out a number of strategic and thematic policies to manage development within the district up to at least 2040, including the delivery of over 30,000 new homes and over 70ha of new employment land. The plan will also include a number of site allocations for housing, employment and other uses, along with a series of sites designated for environmental protection. Importantly for this commission, the plan will also set out retail and town centre use requirements and policies in line with strategic directions in the new plan, and against a backdrop of national policy and guidance.
- 1.4 The key required outputs as requested by the Council at inception stage are as follows:
 1. Updated healthchecks for defined centres
 2. Analysis of convenience and comparison goods shopping patterns
 3. Retail expenditure and floorspace needs assessment
 4. Commercial leisure demand assessment
 5. Policy review and recommendations
- 1.5 In addition to the above, there is a wider specific focus of the Study in respect of the Council’s aspirations and plans for the transformation and regeneration of defined centres within the district, with a particular focus on the city centre, alongside Shipley and Keighley town centres. The Study is being prepared at an important time in respect of the wider context of the authority’s aspirations for the defined centres within Bradford.
- 1.6 In light of the above, we have drawn on the ongoing plans, frameworks and future aspirations for the centres in Bradford as part of this Study, which have helped us to formulate policy recommendations and ensure that the relevant policies in the forthcoming local plan reflect what is happening in practice within Bradford’s centres. This is of particular importance in planning for the future needs of residents in respect of the retail and leisure floorspace across the authority area, ensuring that there are sufficient amenities to meet day-to-day needs but also be appropriately planned to reflect the changing trends on our high streets.
- 1.7 In this regard, the wider extent of Bradford city centre is in a period of transformational change and which will significantly alter both its physical geography and the nature of demand for ‘town centre uses’. Historically, the city centre has been characterised by a concentrated retail core, supported by comparison shopping, retail services and wider amenities. However, structural changes in retailing, together with major public investment and city centre regeneration, mean that Bradford is transitioning towards a more balanced mixed-use city centre

where residential, employment, culture, leisure and hospitality become increasingly important drivers of vitality alongside retail.

1.8 Two key projects are being progressed within the context of the city centre, which we refer to later in the Study:

- **City Village** - which will deliver up to 1,000 new homes across the former Oastler, Kirkgate and Chain Street sites, together with new public spaces, active travel connections and complementary retail, leisure and commercial uses.
- **Southern Gateway** - a 126-hectare regeneration area extending the city centre southwards, which has the potential to deliver over 5,000 homes, new employment districts, a new city centre rail station, public transport investment, public realm and commercial development over the coming decades.

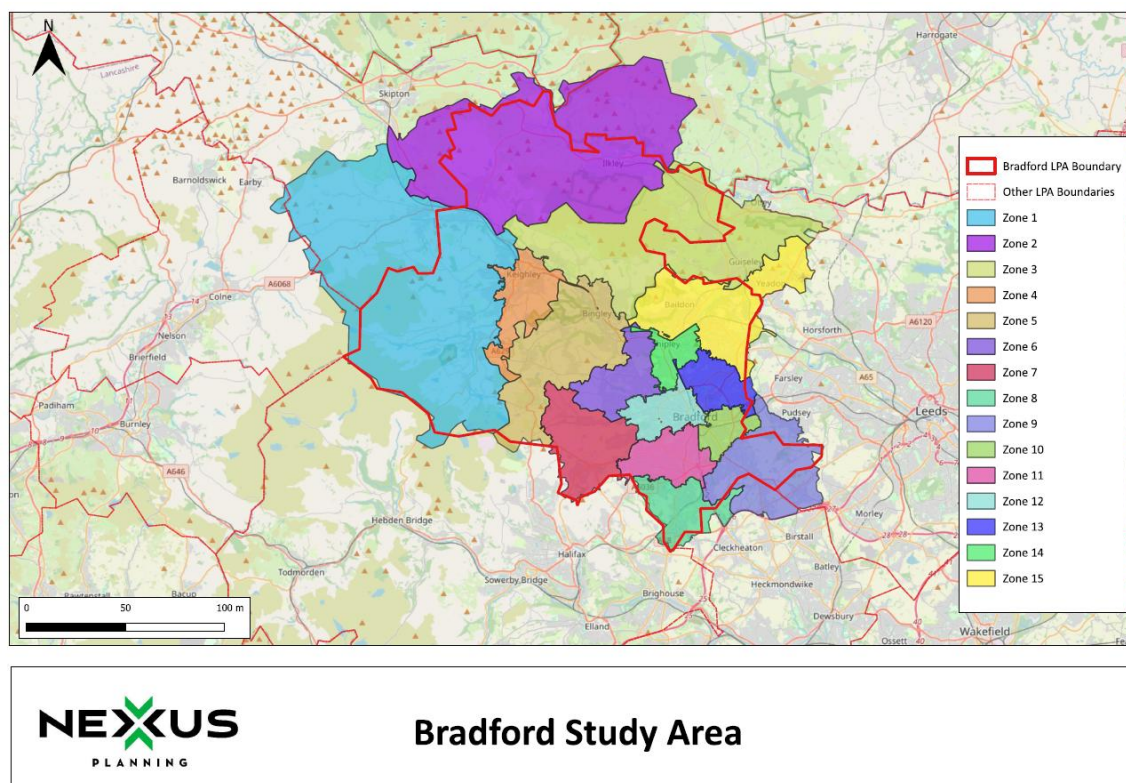
The 2026 Study

1.9 This 2026 Study will replace the previously published retail and town centre evidence base documents to reflect the latest position in respect of the commercial market, the implications this has had on Bradford's centres and other retail and leisure facilities, and to help plan to protect the future vitality and viability of the defined centres through the provision of appropriate planning policies.

1.10 This Study is underpinned by new empirical evidence in the form of a new household shopper survey, and our site visit to survey and assess the health of the defined centres. The household survey was undertaken by NEMS Market Research in February 2026 and covers fifteen separate zones, which are collectively considered representative of the principal catchment area for retail facilities and leisure facilities located within the Bradford authority area. The zones have been developed with regard to those utilised in the previous Study, which provides us with the opportunity to compare shopping and leisure patterns.

1.11 A plan of the Study Area is provided at Figure 1.1 and in Appendix 1, and the tabulated household survey results are provided at Appendix 2.

Figure 1.1: Study Area and Zones



- 1.12 Whilst the Study Area largely corresponds with the boundaries of the Bradford authority area, it does include small parts of neighbouring authority areas, where residents sometimes look to facilities in Bradford's centres, along with the wider district, to meet at least some of their retail and leisure needs.
- 1.13 In this regard, it is important to recognise that shopping habits are not governed by local authority area boundaries. It is therefore appropriate to consider the 'inflow' of retail expenditure from residents of neighbouring authority areas to destinations in Bradford in order to identify retailers' overall turnover and understand the role of centres and standalone stores across the wider area. The household survey also allows us to identify expenditure that originates within Bradford but which 'leaks' to destinations outside of the authority area.
- 1.14 It is important to state at the outset of this study that any medium to long term forecasts should be treated with caution. They are influenced by the dynamic changes in economic, demographic, lifestyle and market trends; including the rise of online shopping over the last decade, and wider implications on the market across the country and further afield.
- 1.15 The inherent uncertainties in forecasting are recognised by both the NPPF and NPPG. For example, the NPPG states that assessments '....may need to focus on a limited period (such as the next five years)' but will also need to take the lifetime of the plan into account and be regularly reviewed.

Structure of Report

- 1.16 Our report firstly provides an overview of prevailing retail and leisure trends, before then going on to consider the planning policy context for the updated Study. We then consider the vitality and viability of the principal centres within the authority area.

1.17 The remainder of the report identifies retail and leisure needs arising within the district to 2043. To undertake this assessment, we identify population and expenditure growth across the Study Area. We set out below how this has been undertaken under two separate scenarios to take account of both Experian's projected population growth, and the planned housing growth as set out in the Council's local plan. The final sections of the report provide our conclusions in respect of retail and leisure needs and provide our planning policy recommendations.

1.18 Accordingly, this report is structured as follows:

- Section 2 sets out key retail and leisure trends of relevance to the commission;
- Section 3 provides an overview of the planning policy context;
- Section 4 summarises our assessment of the vitality and viability of the principal centres;
- Section 5 provides an overview of forecast changes in Study Area population and expenditure;
- Section 6 provides an overview of the market share attracted to key destinations within the district and how this has altered since the production of the previous study;
- Section 7 provides an assessment of retail needs;
- Section 8 provides an assessment of leisure needs; and
- Section 9 summarises our key findings and sets out our conclusions and policy recommendations.

2. Current and Emerging Retail and Leisure Trends

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

The Current State of the UK Economy

- 2.3 In recent years, the UK economy has been greatly affected by commercial circumstances arising from the Covid-19 pandemic ('lockdowns' in 2020 and 2021), Brexit (January 2020) and the conflict in Ukraine (which started in February 2022). National Statistics ('ONS') figures indicate that UK Gross Domestic Product (GDP) has seen dramatic changes, whereby the GDP index fell from 104.2 in February 2020 to 74.6 in April 2020 and eventually rose back towards March 2022 to its pre-pandemic level.
- 2.4 More recently, despite a strong start to 2025, the second Trump term and the imposition of tariffs resulted in a slowdown in UK-US trade. Furthermore, heightened instability in the Middle East throughout 2025 had an impact on energy prices and volatility in the market¹.
- 2.5 The Monthly GDP is estimated to have grown 1.1% in the three months to May 2026, compared with the three months to May 2025². This is shown in the image below. UK GDP is estimated to have increased by 1.3% in May 2026, compared with the same month in 2025, suggesting that the economy has seen a period of recovery from a series of 'economic shocks', such as the Covid-19 pandemic (including the resultant workforce shortage) and the Russian invasion of Ukraine, which were significant contributors to a technical recession in the second half of 2023³, as well as recent conflict in the Middle East.
- 2.6 Interest rates increased rapidly from 2.6% in March 2025 to 3.8% in July 2025 but are expected to settle at 3.50% by the end of 2026. Longer-term forecasts indicate interest rates could continue to fall by the end of 2027 but will not return to pre-March 2025 levels⁴.
- 2.7 UK inflation fell to 2.6% in June 2026, the lowest since December 2024, but still above the Bank of England's 2% target⁵. However, the volatility in international energy prices during July related to continuing conflict in the Middle East means there is a great degree of uncertainty about the future path of UK inflation⁶. A positive forecast for the economy does rely on the absence of any further global shocks, such as continued instability in the Middle East and the intermittent closure of the Strait of Hormuz, which has already spiked energy and petrol prices.

¹Bank of England, [The UK economy in an unpredictable world, June 2025](#)

²ONS, [GDP Monthly Estimate, May 2026](#)

³KPMG, [UK Economic Outlook, March 2024](#)

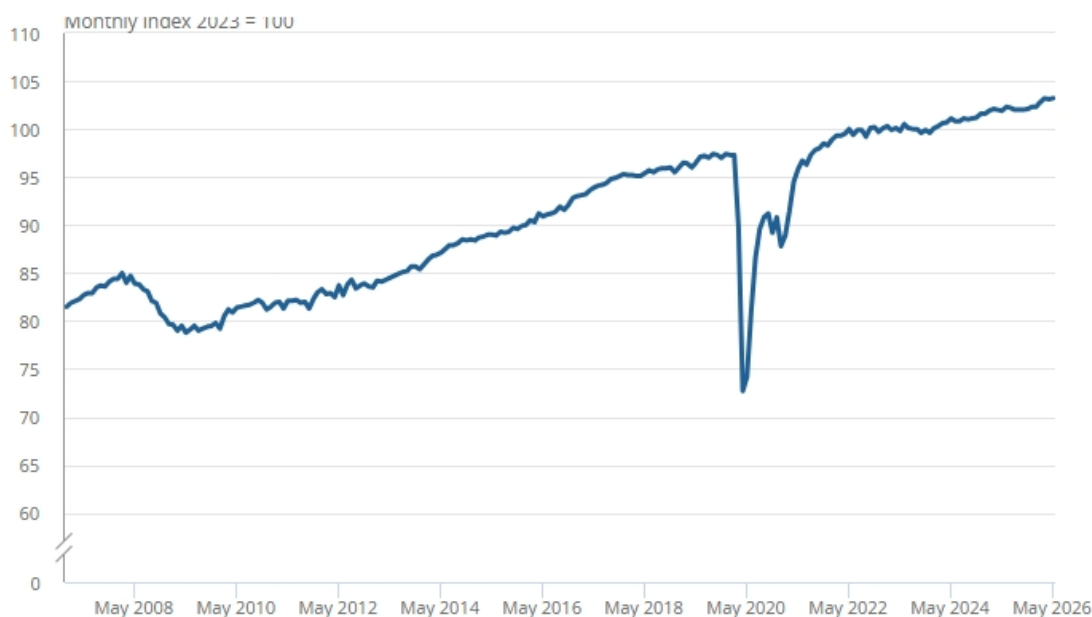
⁴KPMG, [UK Economic Outlook, March 2026](#)

⁵House of Commons Library, [Economic Update, July 2026](#)

⁶House of Commons Library, [Economic Update, July 2026](#)

Figure 2.1: UK Monthly GDP

UK, January 2007 to May 2026



The Retail and Leisure Economy

- 2.8 The retail sector endured a particularly difficult pandemic, with multiple lockdowns and online competition leading to the permanent closure of many shops and businesses. UK high streets have already been in continuous decline since the 2007 recession⁷, with consumer habits moving away from the traditional high street experience. The pandemic, however, accelerated these pre-existing challenges, including an unprecedented rise in online shopping.
- 2.9 Research⁸ shows that the hospitality sector saw the biggest economic decline of all sectors during the pandemic. Periods of public health restrictions saw large falls in output. The peak of the economic downturn was in April 2020, when economic output in the food & accommodation sector was 90% below pre-pandemic levels (February 2020). Overall, economic output from the hospitality industry in 2020 was 42% lower than in 2019, and in 2021, hospitality output was 21% lower than in 2019. The hospitality industry's share of the UK economy fell from 3% in 2019 to 2% in 2020 and 2021. However, as all Covid-19 restrictions were lifted from early 2022, the hospitality sector set a strong trajectory for recovery, particularly as international tourists returned. It is forecast that the hospitality and leisure sectors are expected to be the fastest-growing parts of the economy over the next five years.
- 2.10 Research has also been published on the likely impact of the use of weight-loss drugs on consumption habits⁹. The effects of weight-loss drugs on appetite and appearance, and squeezing household budgets to pay for the drugs, could drive a shift away from categories such as out of home dining and groceries towards categories such as clothing and cosmetics. As a result, spending on dining out could potentially fall by between 1.6% and 3.7%

⁷ In 2011, the Portas Review summarised the challenges for high street retailers as follows: "The phenomenal growth of online retailing, the rise of mobile retailing, the speed and sophistication of the major national and international retailers, the epic and immersive experiences offered by today's new breed of shopping mall, combined with a crippling recession, have all conspired to change today's retail landscape".

⁸ House of Commons Library – Research Briefing - Hospitality industry and Covid 19, 11 May 2022

⁹ KPMG, UK Economic Outlook, March 2026

- 2.11** Retail sales values in the UK grew 3.4% in 2025, with grocery values up by 3.8%, and non-food values up by 2.9%. Savills estimates that average weekly high street footfall saw year-on-year growth across Q1, Q2 and Q3 of 2025 for high streets, shopping centres and retail parks¹⁰. Whilst heatwave weather conditions resulted in a fall in high street footfall during Q2 2026, vacancy rates continue to follow a gradual downward trend. High street vacancy fell to 13.2% in Q1 and Q2 2026 and 16.1% in shopping centres¹¹. This is the lowest level since Q3 2020. Many town centres have benefited from the ongoing diversification of occupier mix, with food and beverage, health and wellbeing, convenience retail and service-led operators continuing to absorb available space.
- 2.12** The occupancy of centres is one thing, but the composition is another important indicator of centre vitality. A report produced by Health Equity North (May 2025)¹², states that community amenities such as banks, pharmacies and grocers are being replaced by vape shops, bookmakers, and takeaway outlets. It is estimated that vape shops have increased by nearly 1200% in England between 2014 and 2024, and takeaway shops are up 24% across the whole of England. Pharmacy availability has decreased by 20% in the most deprived parts of England, and banks and building societies on high streets have decreased by 40% nationally. As such, whilst declining vacancy rates and fast reoccupation of vacant units are positive, the reoccupation of units with 'health reducing' amenities is a key consideration for local planning authorities.
- 2.13** The cost of living is the most commonly reported issue facing the UK according to a recent public opinion survey conducted by the ONS¹³, with 88% of respondents citing it as an important issue. The cumulative effect of price increases over a longer period of time provides an insight into changes to the cost of living. UK consumer prices rose by 30.7% between January 2021 and June 2026¹⁴. By contrast, in the previous five-and-a-half-year period, from August 2015 to January 2021, prices rose by a total of just 8.7%. Food prices rose by 39.3% between January 2021 and June 2026, compared to just 3.9% in the previous 5 and a half years.
- 2.14** The government announced the Budget 2025¹⁵ in November 2025, which has several implications, both positive and negative, for retail and town centres. Reforms to business rates will mean that small and independent businesses will benefit from lower business rate multipliers, while larger chain retailers will experience higher multipliers. An increase in the national minimum wage will increase labour costs, narrowing profit margins. Consumer spending is also likely to be restricted due to the freeze on tax thresholds and limited purchasing power.

Consumer Spending

- 2.15** The latest Experian Retail Planner Briefing 23 (March 2026) makes several comments regarding consumer spending, focusing on the UK's recovery from the economic impact of the Russia-Ukraine war and the Covid-19 pandemic, and discusses the impact of continuing tariffs and geopolitical disruptions in the Middle East.
- 2.16** Data collected at the start of 2025 suggests that, due to high inflation over the last three years, a trend of reduced spending still exists. Spending growth over the course of 2025 is being hindered by the effects of the cost-of-living crisis, high interest rates, and a high tax burden. However, rising real pay growth and continued strength in the labour market should see improvement compared to 2024. Experian estimates that retail sales volumes grew by 1.3% in 2025.

¹⁰ [Savills, Spotlight: Shopping centre and high street, February 2025](#)

¹¹ [Savills, Spotlight: Shopping centre and high street, August 2026](#)

¹² [NIHR, Report finds an increase of 'health reducing' amenities on local high streets, including a sharp rise in vape shops, May 2025](#)

¹³ [ONS, Public Opinions and Social Trends, June 2026](#)

¹⁴ [House of Commons Library, Economic Update, July 2026](#)

¹⁵ [Budget 2025 in full - GOV.UK](#)

- 2.17 Convenience spending has experienced an ongoing wind-down, following a large contraction of -1.8% in 2024, as convenience spending was predicted to further contract in 2025 by about -0.9%. However, growth in spending is estimated from 2026, by +0.5% and +0.9% in 2027.
- 2.18 Conversely, Experian predicted that comparison would grow by 1.8% in 2026, and 1.8% in 2027. The largest growth will be in spending on bulky goods, which is estimated to grow by 4.4% in 2027.
- 2.19 Despite leisure sales falling markedly in 2020 (given the Covid-19-related lockdowns), they recovered lost ground in 2021 and stood higher than pre-pandemic levels by 2022, at £202.3bn nationally. However, the cost-of-living crisis affected spending in 2024, and sales were estimated to have fallen -1.6%. In 2026, an increase of 0.2% is predicted, suggesting a slow reversal of recent leisure spend downturns.

Table 2.1: Experian's Identified and Forecast Growth in Expenditure per Head

Volume Growth Per Head (%)	2025	2026	2027	2028–2032	2033–2041
Retail spend	-0.9%	0.5%	0.9%	1.4%	1.4%
Convenience goods	-1.5%	-0.5%	-0.5%	-0.2%	-0.2%
Comparison goods	-0.5%	1.2%	1.8%	2.5%	2.6%
— of which bulky	-1.0%	2.7%	4.4%	2.1%	1.5%
— non-bulky	-0.2%	0.8%	1.3%	2.8%	3.0%
Leisure	0.7%	0.8%	0.6%	1.1%	1.0%
Consumer spending	-0.1%	0.2%	0.6%	1.2%	1.4%

Online Shopping

- 2.20 The rise in internet retailing has been at the forefront of retail evolution for a number of years. Covid-19 accelerated this trend.
- 2.21 Generally, Experian shows that growth in non-store retail is expected to be maintained, particularly through the wider adoption of commonplace technology such as mobile phones and tablets combined with 5G and fibre optic networks, faster delivery times, and easier returns processes to make internet shopping even more convenient. Experian expects that market share will continue to grow strongly in the mid-term, whereby by 2040, 37.1% of retail expenditure will be spent online. The pace of e-commerce growth is anticipated to moderate over the long term, but will rise again to a peak of 30.8% (in 2021 as a result of Covid-19) by 2030.

Table 2.2: Experian's Identified and Forecast Market Share of Non-Retail Sales¹⁶

Volume Growth Per Head (%)	2025	2030	2035	2040	% Change
Total	27.8%	30.8%	33.9%	37.1%	+9.3
Convenience goods	17.6%	20.0%	22.2%	24.5%	+6.9
Comparison goods	34.5%	36.9%	39.1%	41.4%	+6.9

Source: Figure 5 of Experian Retail Planner Briefing Note 23

Leisure and Food & Drink

- 2.22 The greater availability of high street units appears to have helped stoke an entrepreneurial spirit in recent years, with a number of centres beginning to benefit from a greater focus on independent retailers and also modern markets, which are frequently focused around food and drink operators.

¹⁶ Experian, Retail Planner Briefing Note 23, March 2026

- 2.23 More generally, the food and drink sector was buoyed pre-pandemic by the success of mid-market national multiples, which expanded quickly across the UK. However, this market has become saturated in many locations and a number of high profile operators have been in financial difficulty. Given the problems suffered by such operators, the market has become more cautious and mid-market operators are picking new sites carefully as a result. Instead, we have seen a number of independent operators flourish, both before and throughout the pandemic, and a desire for customers to choose local operators over larger regional and national brands.
- 2.24 A further significant recent high street success story has been the resurgence of the town centre leisure sector, which has resulted in new cinemas being developed close to the shopping core and the emergence of 'competitive socialising' concepts, which include bowling, crazy golf, table tennis, darts, axe-throwing, escape rooms and other seemingly niche pursuits.
- 2.25 Cinema openings have been on the up in the early part of this century (until the Covid-19 pandemic) and 'boutique' cinema operators – including Curzon, Everyman, and The Light – are able to operate from smaller sites in town centres (partly as a consequence of digital technology). Town centre cinema development has successfully underpinned wider mixed-use developments, as food and drink operators are typically keen to locate in close proximity to benefit from spin-off custom. New, innovative leisure operators have been particularly beneficial both in re-using existing difficult to let premises, and in driving the evening economy.
- 2.26 More generally, the gym market continues to perform well, with there now being around 7,200 health and fitness clubs across the UK, which are estimated to have a total turnover of approximately £2bn.¹⁷ Around one in every seven Britons has a gym membership. Budget gyms are currently particularly popular, with operators such as Pure Gym, the Gym Group, and easyGym utilising a format that is based on low costs and high volume.

The Night-Time Economy

- 2.27 The term night-time economy is used to describe a wide range of activities that (typically) take place after 5pm. This could range from a trip to the theatre or cinema, to a family meal, to a night out at a club. A successful night-time economy generally caters for a wide range of demographics and interests.
- 2.28 Creating a safe, vibrant and well-balanced evening and night-time offer is a challenge that can dramatically improve the overall health of a town centre and boost the economy.
- 2.29 The Association of Town and City Management ('ATCM') has identified a number of themes to help improve the attraction and operation of the night-time economy, which are summarised as follows:
- **Alive After Five** – This relates to revisions to trading hours to better suit customers' shopping needs and availability. A Retail Trading Hours Study commissioned by ATCM found that sales between 5 pm and 8 pm are typically 50% greater than those between 9 am and 11am. Revising trading hours to open and close later could increase sales by around 10% to 12%.
 - **Late Night Transport** – The lack of frequent, efficient and safe public transport late at night, or at least the perception of this being the case, could be having a detrimental effect on night-time economy and social scene. One way of increasing night-time visitor numbers is to promote late-night travel provision and its publicity.
 - **Purple Flag** – This is an accreditation scheme which recognises excellence in the management of town and city centres at night. Obtaining Purple Flag accreditation demonstrates that a town's night-time economy

¹⁷ 'Number of health clubs in Europe in 2020, by country' dataset, Statista, 27 October 2022.

offers clean and safe environments, great bars and clubs, a variety of arts and cultural attractions, and excellent transport links.

- **Evening Economy Ambassadors** – The ambassadors improve the evening and night-time experience in a town centre by liaising between visitors, police, door staff, licensees, and transport operators.
- **Light Night** – This is an initiative where town or city centres stays open after dark for people to enjoy local shops and services within a wider cultural event involving music, art and, most importantly, through the lighting up of buildings and light-based art installations.

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

Planning Reform on the High Street

2.31 One of the most impactful planning reforms in recent times has been the consolidation of a number of separate Use Classes under a single Class E 'Commercial, Business and Service' use. This update to the Town and Country Planning (Use Classes) Order 1987 (the 'UCO') came into effect in September 2020. The new Use Class combines shops, restaurants, offices, gyms and nurseries (amongst other uses) such that planning permission is no longer typically required to switch uses.

2.32 Furthermore, in March 2021, an update was made to the General Permitted Development (England) Order 2015. This allows for the change of use from Class E properties to residential from August 2021 (extending a right that had previously been restricted to office uses). This permitted development right is subject to maximum size requirements, the property having been in use as Class E for two years and having been vacant for three months. An application to the determining authority for 'prior approval' is also required for limited consideration of impacts relating to transport, contamination, flood risk, noise, light, and neighbouring amenity. Further limitations apply in Conservation Areas and for nurseries, as well as in areas covered by 'Article 4 directions' where permitted development rights are extinguished.

2.33 On 20 July 2021, paragraph 53 of a new iteration of the National Planning Policy Framework ('NPPF') set out limitations on the use of Article 4 directions. The then revised national policy seeks to qualify the areas in which it is justified to introduce Article 4 directions, limiting local authorities' ability to control development.

2.34 The changes in the application of Article 4 directions were first put forward in the January 2021 consultation for draft revisions to the NPPF. However, the actual policy provision differs from the initial consultation in a couple of key areas. Paragraph 53 of the previous NPPF of July 2021 recognised that the loss of the 'essential core of a primary shopping area' could result in wholly unacceptable adverse impacts on an area's vitality and viability. This was the Government's first acknowledgement of the potential for the permitted development rights to undermine the health of centres in the NPPF. The updated text also introduced a requirement for 'robust evidence' to support the removal of development rights. The most recent iteration of the NPPF, published in August 2026, retains these changes.

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

Out-of-Centre Retailing

- 2.36 Another key format of retailing (and provision of leisure uses) are out-of-centre retail warehouse destinations. Whilst local authorities need to retain control over out-of-centre provision from a planning perspective, such provision does play an important part in providing space for operators who may not be able to viably trade from in-centre locations. Such uses include 'bulky' retail operators, including DIY stores, electrical goods retailers, furniture stores and so on.
- 2.37 In their UK Retail Warehousing April 2025 Spotlight Report, Savills note that: **'...despite the failure of two of the sector's longest-running operators, it is important to point out that at no point did national vacancy climb above 5%. The level of interest and speed at which the best vacant Carpetright and Homebase units were acquired is tantamount to the strong competitive tension that still exists in the market.'** In terms of the nature of the operators, it is the value orientated brands which continue to top the charts of the most acquisitive retail and leisure operators.
- 2.38 In this regard, Savills note that the retailers with a focus on essential product categories have continued to drive footfall to out-of-centre schemes, which remain at near parity with the levels seen pre-Covid. Furthermore, operators which focus on essential products have dominated the new openings, including Aldi and Lidl, Home Bargains, B&M Retail and leisure operators such as PureGym, Greggs and Starbucks. Indeed, the Savills' Spotlight Report notes that:
- '...as we have seen in the past, when consumers swing into belt-tightening mode, large parts of the retail warehouse market stand to benefit. As we explored in the previous issue of this Spotlight, the out-of-town market is less dependent on big-ticket discretionary spend and increasingly focused on essential and value-based retail, especially with the growth of discount variety retailers and value-oriented grocers.'**
- 2.39 In addition to the above, most out-of-centre shopping locations retain their apparent significant competitive advantages over town centres and high streets in terms of their supply of larger format modern outlets, their lower occupancy costs, extensive free parking and easy and convenient access to the surrounding highways and key arterial routes. This is still an attractive proposition for those retailers that are still seeking space in the current market, but the implications of the attraction of out-of-centre facilities on defined centres, needs to be monitored carefully and the ongoing ease of access, parking and overarching attraction of out-of-centre facilities can of course have implications for town centre operators and retail and leisure planning policy.

Conclusion

- 2.40 Retail has been an industry under significant stress, as many retailers find themselves squeezed between rising costs and the increasing volume of sales over the internet. Such difficulties have, of course, been exacerbated by the Covid-19 pandemic and the cost-of-living crisis associated with rising energy prices and inflation. In response to this unpredictability, those operating in the market are forced to adapt quickly or otherwise face falling profits.
- 2.41 There will still be the need and demand for physical stores, despite the increase in shopping online. This is particularly the case for convenience goods sales since the online shopping orders are typically picked from the shelves of physical stores. In respect of comparison goods, there is a need for the offer to become more 'experiential' to encourage shoppers onto the high street, and to ensure that shopping is viewed as a pleasurable pastime. The shopping experience needs to evolve and diversify both to attract footfall and convert increased activity into sales. Independents clearly have an important role to play in adding interest and in providing differentiation between shopping venues.
- 2.42 Whilst there may be a demand for more physical stores, the increases in pubs and restaurants in town centres have boosted the economy in town centres in some locations and reduced the number of empty units.

- 2.43 In a market disrupted by continued changes in consumer behaviour, investing in the consumer experience is anticipated to be the key to success in securing resilience in retail stores moving forward. Planning policy can play an important role in helping to future-proof town and village centres against the ongoing uncertainty.

Implications for the Bradford Authority Area

- 2.44 The market trends identified within this study indicate that the district's defined centres are facing a period of significant transition, driven by changing consumer behaviour, technological change, economic uncertainty and substantial positive public sector investment. Indeed, the substantial positive changes being brought forward by both the Council and its important stakeholders, will have long-lasting benefits to the centres within the authority area. These plans not only seek to provide for the much needed retail, leisure, service and other uses within the defined centres of Bradford to meet residents' needs, but also respond positively to the wider national encouragement that housing in defined centres will help protect their future vitality and viabilities.
- 2.45 As we go on to explore later in this Study, the significant regeneration plans across the district build on the market demand, the population growth and the need to diversify and change centres to better meet needs. This is not necessarily a change only impacting the Bradford authority area, but it is a change which is being responded to positively by the Council in bringing forward alternative uses within the centres. Indeed, whilst 'traditional' comparison retailing continues to face structural challenges arising from online shopping, inflationary pressures and changing shopping habits, demand is increasingly shifting towards mixed-use town centres that provide a broader range of retail, leisure, cultural, residential and community uses, which better meet the specific needs of residents.
- 2.46 For Bradford, a key challenge is not simply maintaining retail floorspace, but adapting centres to changing occupier requirements whilst capitalising on the considerable regeneration investment taking place across the district. The city centre, in particular, is well placed to benefit from investment in the Southern Gateway, City Village, Bradford Live, Darley Street Market and wider public realm improvements, which are expected to generate increased footfall and create opportunities for new businesses.
- 2.47 Historically, retail activity has been concentrated around Broadway Shopping Centre, Market Street, Kirkgate and the existing defined Primary Shopping Area. However, as the market has evolved and consumer habits alter, the focus of the 'pure' retail function of the city centre has been concentrated into those key areas (which we explore further as part of the healthcheck work later in the Study), leaving those peripheral areas open to wider mixed-use opportunities to help support the overarching vitality and viability of the centre as a whole. It is these opportunities which the Council is bringing forward to help revitalise and diversify the city centre.
- 2.48 The City Village proposals represent perhaps the clearest example of this evolution. Rather than seeking to replace former shopping centres with new retail floorspace, the scheme recognises that long-term vitality will be achieved by introducing a permanent residential community capable of supporting a broader mix of commercial operations, and making sure that activity continues throughout the week and not just in the daytime.
- 2.49 Similarly, Southern Gateway will create a second major focus of activity, centred around the proposed rail station and new employment districts. Over time this is likely to expand the city centre southwards, creating new pedestrian desire lines and redistributing footfall between the traditional commercial core and emerging development areas.
- 2.50 The commercial market overview provided above suggests that food and beverage operators remain one of the strongest growth sectors, although expansion is increasingly being driven by independent businesses rather than national mid-market chains, many of which have become more selective following financial pressures. Modern markets, local food offers and independent operators are increasingly valued for providing distinctive destinations

and differentiating centres from competing retail locations. However, there is still a considerable 'churn' of leisure operators who seek presence in the market but which can often struggle longer-term due to an ongoing pressure on residents' spending power.

- 2.51 The commercial leisure sector also continues to present significant opportunities. Growth is increasingly centred around experience-led activities, including competitive socialising, boutique cinemas, health and fitness facilities and other leisure attractions that encourage longer dwell times and support the evening economy. Such uses are particularly important in reoccupying larger vacant units, increasing footfall both during the daytime and into the evening, and underpinning wider town centre regeneration.
- 2.52 Indeed, creating safe, accessible and attractive evening destinations, supported by good public transport and cultural programming, will be essential if Bradford is to maximise the benefits of its significant regeneration investment and strengthen the vitality of its centres.
- 2.53 Although vacancy rates have improved nationally, there is evidence that some vacant units are being occupied by lower-value or 'health reducing' uses, including vape shops and betting shops, while banks and other essential services continue to decline. Managing the quality and diversity of occupiers will therefore be as important as reducing vacancy levels. Recent planning reforms, including the flexibility afforded by Use Class E and the use of Article 4 Directions where justified, provide local authorities with opportunities to encourage appropriate diversification whilst protecting the long-term vitality and viability of key centres.
- 2.54 At the same time, competition from out-of-centre retail parks remains strong, particularly for value retailers, bulky goods operators, discount foodstores and budget leisure providers. These locations continue to benefit from larger units, lower occupancy costs, free parking and easy accessibility, reinforcing the need for Bradford's centres to compete through quality of place, experience and mixed-use regeneration rather than retail alone.
- 2.55 Overall, the evidence from the commercial market overview indicates that future demand across the district will be driven less by traditional retail expansion and more by a diversified mix of independent retail, food and drink, leisure, cultural attractions, health and wellbeing, residential development and flexible commercial space.

3. Planning Policy Context

- 3.1 In order to shape the direction of this Study, it is helpful to understand relevant retail and town centre planning policy at a national and local level. As such, we first summarise national planning policy of relevance before considering retail and town centre development plan policy as set out in the current development plan. We also consider changes to the Use Classes Order and the application of permitted development rights to town centre uses.

National Planning Policy Framework

- 3.2 The National Planning Policy Framework ('NPPF') was published in August 2026. The NPPF reflects the fact that the traditional role of town centres has been somewhat undermined by structural changes in the retail sector, and that there may be a need to plan for a more diverse range of uses going forward. As such, the NPPF advocates a more flexible policy framework to support the future vitality and viability of town centres.

- 3.3 The 'Ensuring the vitality of town centres' chapter in the NPPF is split into two parts: one plan-making policy (TC1) and three development management policies (TC2/3/4). There is also an over-arching statement prior to the two sets of policies:

'The objective of the policies in this chapter is to promote the long-term vitality and viability of town centres by prioritising them as locations for main town centre uses and allowing them to adapt to changing community and business needs, in a way which reflects their locally distinctive roles and opportunities'.

- 3.4 Policy TC1 relates to planning for town centres and states that in order to promote the long-term vitality and viability of town centres, development plans should, at the most appropriate level:

- A. **'Be informed by a strategy for town centres in the area, to ensure that the full range of potential needs and opportunities for development is considered, including the scope to accommodate additional floorspace, to broaden the mix of uses (including residential uses) and to bring vacant sites and premises back into use;**
- B. **Set out the hierarchy of centres, and any areas within them where specific policies on the nature and scale of development apply, including:**
 - i. **the extent of town centres;**
 - ii. **areas particularly suitable for a greater diversity and/or intensification of use, including through residential development; and**
 - iii. **areas within which infrastructure and public realm improvements are proposed.**
- C. **Allocate a range of suitable sites in town centres to meet the scale and type of main town centre uses needed over the plan period in these locations, as well as for any complementary uses. Before reviewing town centre boundaries to accommodate any increase in development which is needed, existing vacant town centre sites and areas that are particularly suitable for intensification should be considered to maximise effective use of land;**
- D. **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 set out proposals for identified needs to be met in other accessible locations that are well connected to the town centre; and**
- E. **Where appropriate, set a locally defined floorspace threshold for development proposals outside town centres, above which an impact assessment would be required, as set out in policy TC4.'**

- 3.5 There are three development management policies which deal with town centres and the management of proposals for main town centres uses outside of town centres. There is now a specific stand-alone national policy:

TC2. It is directed specifically at proposals located within town centres, with the singular aim of supporting the overall vitality and viability of the centre.

3.6 Policy TC3 is intended to deal with the sequential test. Part (1) of Policy TC3 in the NPPF states:

'A sequential test should be applied to proposals for main town centre uses for which planning permission is required, where these are neither in an existing centre nor in accordance with an allocation for that purpose in an up-to-date development plan.'

3.7 Policy TC4 deals with the assessment of the likely impact of certain development proposals on town centres. Part (2) of Policy TC4 in the NPPF states that:

'In circumstances where an impact assessment is required, it should be demonstrated that the development would be unlikely to have a significant adverse impact on:

- a. Existing, committed and planned public and private investment in a town centre or centres in the catchment area of the proposal; and
- b. 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).'

Ensuring the Vitality of Town Centres Planning Practice Guidance

3.8 The Town Centres and Retail Planning Practice Guidance ('the Town Centres PPG') was published in July 2019 and thereafter updated in September 2020. It provides additional direction in respect of how retail and town centre planning policy should be applied in respect of plan-making and decision-taking. The Town Centres PPG affirms the Government's aspiration to support town centres in order to generate employment, promote beneficial competition and create attractive, diverse places where people want to live, work and visit.

3.9 Paragraph 004 of the Town Centres PPG indicates that a local planning authority's strategy for their town centres should include:

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

- The role that different stakeholders can play in delivering the vision. If appropriate, it can help establish the level of cross-boundary/strategic working or information sharing required between both public and private sector groups.
- Appropriate policies to address environmental issues facing town centres, including opportunities to conserve and enhance the historic environment.

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

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

Use Classes Order

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

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

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

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

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

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

Town Centre Use Permitted Development Rights

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

Local Planning Policy Context

Bradford Local Plan

- 3.18 The Core Strategy identifies town centres as the heart of communities, supporting a mix of retail, leisure, residential and community uses. The Council seeks to protect and enhance the vitality and viability of centres, ensuring they remain key economic hubs and adapt to changing retail patterns, including the growth of online shopping.

Retail and Town Centres

- 3.19 Policy EC5 establishes Bradford district's strategy for maintaining and enhancing a sustainable network and hierarchy of city, town, district and local centres. The policy seeks to concentrate retail, leisure and office development in sequentially preferable locations, prioritising sites within centres before considering edge-of-centre and out-of-centre locations. It defines the role of each level of the hierarchy, with Bradford City Centre as the principal focus for major commercial, cultural and leisure activity, supported by the principal town centres of Keighley, Ilkley, Bingley and Shipley, district centres serving day-to-day needs, and local centres providing neighbourhood shopping and services.
- 3.20 The policy requires the application of the sequential test for main town centre uses outside existing centres and introduces locally specific impact assessment thresholds ranging from 1,500 sq.m in Bradford City Centre to 200 sq.m adjacent to Local Centres. Proposals that fail the sequential test or would have a significant adverse impact on investment, vitality or viability should be refused. Retail, leisure and office development outside designated centres is only supported where there are no suitable sequentially preferable sites, the scale is appropriate, accessibility is good, and there would be no unacceptable impact on existing centres or wider economic objectives.
- 3.21 The document also explains how Policy EC5 is supported by the wider Bradford Local Plan. Policy SC4 reinforces the settlement hierarchy by directing major retail, leisure and cultural development towards Bradford City Centre and Shipley, while area-based policies (BD1, BD2, AD1, AD2, WD1, WD2, PN1 and PN2) promote regeneration, investment and appropriately scaled town centre development across the district. Policy EC1 further supports investment in sustainable locations that strengthen economic growth and town centre vitality. Together, these policies provide a comprehensive framework for directing growth to the most sustainable locations while supporting the long-term health and resilience of Bradford's network of centres.

Bradford Replacement Unitary Development Plan (Saved Policies)

- 3.22 A number of saved policies from the Bradford Replacement UDP remain relevant to retail and leisure development. Policy CT1 requires development in city and town centres to accord with the relevant policy statements, while Policy CT4 seeks to safeguard and, where appropriate, incorporate arcades and canopies within central shopping areas.
- 3.23 Policy CT5 protects the role of Primary Shopping Areas by seeking to retain a strong retail function, while allowing non-retail uses where they are appropriate and do not undermine the centre. Policy CT6 seeks to protect the amenity of people using city and town centres from development that would have significant adverse effects.
- 3.24 Policy CR1A supports retail development within central shopping areas, city and town centres, district centres and local centres, provided proposals are of a scale compatible with the role of the centre. Policy CR4A sets out the criteria for retail development outside these locations, including the need to demonstrate need, site availability and no unacceptable impact on defined centres. Policy CR5A allows certain specialist retail uses, including raw materials, motor vehicles and gardening supplies, outside existing centres.
- 3.25 In relation to leisure uses, Policy CL1 supports leisure and entertainment facilities within defined centres where they are appropriate in scale. Policies CL2 and CL3 provide the framework for larger leisure and entertainment proposals, requiring consideration of alternative sites, scale, catchment and potential impacts on the vitality and viability of existing centres.

Bradford City Centre Area Action Plan (Adopted December 2017)

- 3.26 The Bradford City Centre Area Action Plan identifies the city centre as the district's priority regeneration area and establishes a strong policy framework for protecting and enhancing its retail and leisure role. Policy SL1 directs retail development towards the Primary Shopping Area, with proposals elsewhere required to satisfy the sequential test and larger edge-of-centre or out-of-centre proposals subject to an impact assessment.
- 3.27 Policy SL2 seeks to protect and enhance Primary and Secondary Shopping Frontages, supporting appropriate changes of use that contribute to vitality and viability while avoiding harmful concentrations of non-retail uses and maintaining active frontages. Policies SL3 and SL4 complement this approach by supporting improved connections and wayfinding between shopping areas and the retention, enhancement and creation of cultural assets.

Shipley and Canal Road Corridor Area Action Plan (Adopted December 2017)

- 3.28 The Shipley and Canal Road Corridor Area Action Plan supports regeneration across the corridor, with specific provisions for Shipley town centre and surrounding retail locations. Policy SCRC/SE3 identifies the Valley Road Retail Area as an edge-of-centre location for bulky goods and retail warehousing, with proposals assessed against Core Strategy Policy EC5.
- 3.29 Policy SCRC/SE4 supports retail growth within and adjacent to Shipley Town Centre, alongside appropriately scaled neighbourhood retail provision associated with new residential development. Policy SCRC/SE5 seeks to maintain and enhance Shipley Town Centre's Primary Shopping Area, allowing appropriate non-retail uses where these support its retail function and active ground-floor environment.

Addingham Neighbourhood Development Plan (Adopted January 2020)

- 3.30 The Addingham Neighbourhood Development Plan seeks to manage change while maintaining and improving local services and valued village assets. Its approach places particular emphasis on protecting local commercial

provision, including the Co-op, pharmacies and independent shops, recognising their importance to local employment and convenient day-to-day shopping.

Ilkley Neighbourhood Development Plan (Adopted June 2022)

- 3.31 The Ilkley Neighbourhood Development Plan promotes the vitality and viability of Ilkley town centre through a diverse mix of retail, office, leisure, cultural and community uses. Policy INDP17 supports development that maintains and enhances the town centre, seeks to preserve a varied range of shops and community facilities within the Primary Shopping Area, encourages the reuse of upper floors for commercial and residential purposes, and supports temporary uses to bring vacant premises back into active use.

Wilsden Neighbourhood Development Plan (Adopted May 2025)

- 3.32 The Wilsden Neighbourhood Development Plan seeks to strengthen the local centre as a focal point for shops, services, community facilities and pubs serving the village and surrounding area.
- 3.33 Policy W/SH1 supports retail, employment, local services, community uses and pubs within the Local Centre, while restricting their loss to alternative uses unless premises are demonstrably no longer commercially viable, have been actively marketed for at least six months, or suitable alternative facilities are available nearby. New retail and community facilities are generally expected to be located within the centre unless they meet a local need and are appropriately scaled. The plan also supports residential use of upper floors and environmental improvements.
- 3.34 Policies W/SH2–W/SH4 extend protection to shops and pubs outside the centre, promote high-quality and locally sensitive shopfront design, and seek to protect adequate parking provision while supporting improvements to parking within the Local Centre.

Context of the Study and the Emerging Local Plan

- 3.35 The emerging Local Plan provides an important strategic context for the Retail and Leisure Study, setting the framework for how the District will accommodate and manage growth over the next 15–20 years. The Plan seeks to identify new opportunities for housing and employment, support regeneration and make best use of brownfield land, alongside investment in infrastructure, green infrastructure and sustainable transport. It has a particularly strong focus on the continued transformation of Bradford City Centre and the regeneration of the District's urban areas.
- 3.36 For retail, leisure and town centres, the scale and distribution of planned growth will be a key driver of future demand and the role of individual centres. The emerging Plan provides an opportunity to ensure that the hierarchy and function of Bradford City Centre, Keighley, Ilkley, Bingley, Shipley and the District's smaller centres respond positively to changing patterns of shopping, leisure, tourism, living and working. The Plan's approach is to support centres as multifunctional destinations, rather than focusing solely on traditional retail, with the earlier Regulation 18 approach identifying a broad role for centres encompassing retail, leisure, entertainment, culture, tourism, residential and other economic activity.
- 3.37 This Study will therefore provide an important evidence base for the emerging Local Plan, translating the District's growth ambitions into an up-to-date understanding of retail, leisure and town centre needs, capacity, opportunities and constraints. It will help inform future policy and decision-making by identifying where additional floorspace and investment may be required, how the network and hierarchy of centres should evolve, and how planning policy can support the vitality and viability of centres in the face of continued structural change. This will be particularly important as Bradford seeks to use growth and major regeneration and

infrastructure investment to strengthen the role of its city and town centres as economic, cultural, social and community hubs. The study will consequently ensure that future planning decisions are supported by robust, locally specific evidence and that the Local Plan provides a positive and flexible framework for the long-term regeneration and resilience of Bradford's centres

4. Healthcheck Assessments and Land Use

Introduction

- 4.1 The overarching objective of Chapter 8 of the NPPF is to promote the long-term vitality and viability of town centres by prioritising them as locations for main town centre uses and allowing them to adapt to changing community and business needs, in a way which reflects their locally distinctive roles and opportunities.
- 4.2 Paragraph 006 of the Town Centres PPG identifies a range of indicators that should be assessed over time in reviewing the health of a town centre. The indicators include the following:
- diversity of uses;
 - proportion of vacant street level property;
 - retailer representation and intentions to change representation;
 - pedestrian flows;
 - accessibility;
 - perceptions of safety and occurrence of crime;
 - the state of town centre environmental quality;
 - the balance between independent and national multiple retailers; and
 - the extent to which there is an evening and night-time economy offer.
- 4.3 We begin below by looking at the authority's principal centres. In this regard, new healthcheck assessments have been undertaken for Bradford city centre and Keighley, Ilkley, Bingley and Shipley town centres. The detailed healthcheck assessments for the city and town centres are provided at Appendix 3 and we provide a summary of the key conclusions below. For clarity, the composition of uses within the centres is based on the Goad boundary definitions as shown on the attached composition plans.
- 4.4 The assessments is based on a site visit which was undertaken in February 2026. The assessment should be taken as a 'snapshot' of the performance of the centre at a moment in time.

Bradford City Centre

- 4.5 Bradford city centre accommodates approximately 664 retail, leisure and service units and represents the principal commercial, cultural and administrative centre within the district. The centre's composition is diverse, with a strong comparison and leisure offer, supported by a broad range of national multiples, independent operators and cultural institutions. However, the centre also contains a significant proportion of vacant units and floorspace, which remains one of its principal challenges.
- 4.6 At the time of Nexus' survey, Kirkgate Shopping Centre and Oastler Market were open, with some units still operating within them. Both have since closed. We therefore provide composition figures for Bradford city centre both at the time of the survey and following the closure of these two facilities, as shown in Tables 4.1 and 4.1a below. However, the analysis that follows is based on the position recorded at the time of the site visit.

Table 4.1: Composition of Bradford City Centre

	Floorspace (sq.m)	Floorspace (%)	Floorspace UK Average (%)	Units	Units (%)	Units UK Average (%)
Comparison	39,645	25.1%	28.62%	160	24.1%	25.9%
Convenience	8,587	5.4%	15.36%	46	6.9%	9.4%
Financial Service	8,165	5.2%	5.98%	42	6.3%	7.8%
Leisure Service	41,447	26.3%	27.87%	158	23.8%	26.7%
Retail Service	5,733	3.6%	7.27%	73	11.0%	15.9%
Vacant	54,091	34.3%	14.27%	185	27.9%	14.0%
Total	157,668	100.0%	100.0%	664	100.0%	100.00%

Source: Composition of centre derived from Nexus Planning survey of February 2026; UK Average from Experian Goad report of September 2025

Table 4.1a: Composition of Bradford City Centre without Kirkgate Shopping Centre and Oastler Market

Category	Floorspace (sq.m)	Floorspace (%)	Floorspace UK Average (%)	Units	Units (%)	Units UK Average (%)
Comparison	28,869	24.1%	28.6%	123	23.0%	25.9%
Convenience	7,772	6.5%	15.4%	37	6.9%	9.4%
Financial Service	7,716	6.5%	6.0%	38	7.1%	7.8%
Leisure Service	39,601	33.1%	27.9%	145	27.2%	26.7%
Retail Service	5,016	4.2%	7.3%	63	11.8%	15.9%
Vacant	30,569	25.6%	14.3%	128	24.0%	14.0%
Total	119,544	100.0%	100.0%	534	100.0%	100.0%

Source: Composition of centre derived from Nexus Planning survey of February 2026; UK Average from Experian Goad report of September 2025

- 4.7 The comparison offer is focused around The Broadway shopping centre, which accommodates the majority of the city's national multiple retailers including Primark, H&M, Next, River Island, Boots and Superdrug. Whilst the proportion of comparison floorspace is broadly in line with national averages, the overall figure is influenced by the vacant floorspace within the Kirkgate Shopping Centre which closed in June 2026, after our site visit, as we discuss in further detail below. The comparison offer remains one of the centre's key strengths and provides a good range of fashion, footwear, health and beauty and household goods operators.
- 4.8 The convenience offer is below the national average in terms of both units and floorspace, reflecting Bradford's role as a city centre rather than a primary food shopping destination. Provision is nevertheless present through operators including Tesco Express, Sainsbury's Local and the recently opened Darley Street Market, alongside a range of smaller independent food retailers. The market offer in particular provides a distinctive element to the city centre and reflects the diverse communities served by Bradford.
- 4.9 Leisure uses form an important component of the city centre and include a broad range of cultural, entertainment and food and beverage operators. Bradford Live, the Alhambra Theatre, St George's Hall and the National Science and Media Museum provide significant leisure attractions, whilst the restaurant and café offer includes both national multiples and independent operators distributed throughout the centre. The Sunbridgewells tunnel complex is an underground retail and leisure destination which provides a qualitatively different destination and adds to the wider offer of the city centre. The strength of the leisure and cultural offer has been further reinforced by Bradford's designation as UK City of Culture 2025.

- 4.10 The proportion of retail service units is below the national average, although the centre continues to accommodate a wide range of health and beauty operators, opticians, travel agents and postal services. Financial and business services are also represented below national averages in unit terms, although Bradford retains a particularly strong banking presence, with most major high street banks continuing to operate from the city centre.
- 4.11 Vacancy remains a significant issue within the centre, with rates substantially above national averages. Vacancies are concentrated particularly within the Kirkgate Shopping Centre, although empty units are also evident elsewhere throughout the centre. The planned redevelopment of the Kirkgate Centre as part of the City Village regeneration scheme is responsible for these high figures and the future regeneration of the shopping centre should help address this issue over the longer term and provide a more sustainable mix of uses within this part of the city centre.
- 4.12 Overall, Bradford provides a broad retail, leisure and service offer appropriate to its role as the principal centre within the district. The comparison and leisure sectors remain key strengths, supported by significant recent investment in the public realm and cultural offer. However, though the elevated vacancy rate currently detracts from the centre's vitality and viability, the proposed regeneration offers an opportunity to repurpose and upgrade the space, which will positively contribute to the long term health of the city centre.

Town Centres

Table 4.2.: Town Centre Unit Composition at February 2026

Town Centre	Total Units	Comparison	Convenience	Financial	Leisure	Retail Service	Vacant
Keighley	390	26.4%	7.9%	7.2%	20.0%	20.5%	17.9%
Shipley	204	27.0%	7.8%	7.8%	19.6%	20.1%	17.6%
Ilkley	248	35.9%	6.0%	7.7%	23.0%	17.3%	10.1%
Bingley	149	18.8%	8.7%	11.4%	26.8%	24.2%	10.1%
National Average	-	25.9%	9.4%	7.8%	26.7%	15.9%	14.0%

Source: Composition of centre derived from Nexus Planning survey of February 2026; UK Average from Experian Goad report of September 2025

Table 4.3 Town Centre Floorspace Composition at February 2026

Town Centre	Total Floorspace	Comparison	Convenience	Financial	Leisure	Retail Service	Vacant
Keighley	83,340	27.3%	32.8%	3.7%	14.2%	7.0%	14.9%
Shipley	41,481	23.1%	28.3%	7.1%	19.9%	11.6%	10.0%
Ilkley	35,608	29.9%	21.8%	5.7%	25.9%	9.0%	7.6%
Bingley	23,844	14.0%	27.0%	8.1%	30.8%	10.9%	9.2%
National Average	-	28.6%	15.4%	6.0%	27.9%	7.3%	14.3%

Source: Composition of centre derived from Nexus Planning survey of February 2026; UK Average from Experian Goad report of September 2025

- 4.13 Tables 4.2 And 4.3 above provide the overview of the town centre unit and floorspace composition within Keighley, Shipley, Ilkley and Bingley.
- 4.14 We provide a brief summary of each town centre below. Detailed healthcheck appraisals are provided at Appendix 3.

Keighley Town Centre

- 4.15 Keighley town centre accommodates 390 retail, leisure and service units amounting to approximately 83,340 sq.m of commercial floorspace. The centre performs an important role within the Bradford District, serving a wide catchment and providing a broad range of retail, service and administrative functions. The centre is focused around the Airedale Shopping Centre, Low Street and High Street, with larger format retail provision also present within Cavendish Retail Park.
- 4.16 The centre has a higher than average proportion of convenience floorspace, reflecting the presence of larger format food retailers including Morrisons and a number of other convenience operators throughout the centre. Whilst the proportion of convenience units is below the national average, the overall scale of provision suggests that convenience shopping continues to play an important role in supporting footfall and meeting day-to-day needs.
- 4.17 The comparison offer is broadly in line with national averages and includes a mix of national multiple and independent operators. The Airedale Shopping Centre remains the principal comparison destination within the centre, whilst Cavendish Retail Park accommodates a number of larger format retailers including B&M and Sports Direct. Together, these operators provide for a reasonable range of comparison shopping opportunities and reinforce Keighley's role as a principal town centre.
- 4.18 The proportion of leisure uses is below the national average, although the centre accommodates a range of cafés, restaurants, takeaways and public houses. Retail services are more strongly represented and account for a higher proportion of units than is typically seen nationally, particularly health and beauty operators and other personal services. These uses contribute positively to the day-to-day function of the centre and help to support regular visits from local residents.
- 4.19 Financial and business services are represented at levels broadly consistent with national averages and include banks, estate agents and other professional services. Whilst these uses do not form a dominant component of the centre's composition, they continue to provide an important supporting function and reinforce Keighley's role as a service centre for the wider area.
- 4.20 Vacancy levels within the centre are above national averages in both unit and floorspace terms and remain a cause for concern. Vacancies are evident across a number of locations, including parts of the High Street and secondary frontages, where they interrupt otherwise active retail stretches. Notwithstanding this, a number of initiatives are being progressed which have the potential to support the future vitality and viability of the town centre. These include the development of Arts Centre Keighley within the former Beales department store, ongoing work to progress the proposed Keighley Community Health and Wellbeing Centre, and the assessment of potential improvements to Keighley Market. Together with the wider programme of investment being delivered through the Keighley Towns Fund, these initiatives have the potential to support increased activity and investment within the town centre over the longer term.

Shipley Town Centre

- 4.21 Shipley town centre accommodates 204 retail, leisure and service units amounting to approximately 41,481 sq.m of commercial floorspace. The centre serves a local and wider catchment and benefits from its role as an important transport hub within the Aire Valley. The centre is focused around Market Square, Kirkgate and Commercial Street, with a mix of national multiple and independent operators represented throughout the centre.
- 4.22 The centre has a higher than average proportion of convenience floorspace, reflecting the presence of larger format operators, most notably the ASDA foodstore. Whilst the number of convenience units is below the national

average, the overall scale of provision supports regular footfall and reinforces the centre's role in meeting day-to-day shopping needs. Smaller independent food retailers and convenience stores are also represented throughout the centre.

- 4.23 The comparison offer is broadly in line with national averages in terms of units and includes a mix of national multiples and independent retailers. The centre contains a greater proportion of independent operators than many comparable centres, which contributes positively to its character and diversity of offer. However, the relatively limited proportion of comparison floorspace suggests that many of these operators occupy smaller units.
- 4.24 The provision of retail services is significantly above the national average and includes a range of hairdressers, beauty salons and other personal service operators distributed throughout the centre. These businesses form an important component of the overall offer and help to support regular visits and day-to-day activity.
- 4.25 Leisure provision is below the national average in terms of both units and floorspace, although the centre accommodates a range of cafés, restaurants, takeaways and public houses. The leisure offer is predominantly independent in nature and contributes to activity throughout the day and into the evening. Shipley has also developed a reputation for its independent pubs and craft beer venues, which provide a degree of evening activity beyond that typically associated with centres of a similar scale.
- 4.26 Financial and business services are represented at levels broadly consistent with national averages and include a range of banks, estate agents and professional services. Whilst these uses do not form a dominant component of the centre, they continue to provide an important supporting role and reinforce Shipley's function as a service centre.
- 4.27 Vacancy levels are above national averages in both unit and floorspace terms, with vacant units evident throughout the centre. Vacancies are particularly noticeable along parts of Kirkgate, Commercial Street and within secondary frontages, where they interrupt otherwise active retail stretches. However, recent investment in Market Square and wider regeneration initiatives provide opportunities to strengthen activity, improve connectivity and support the longer-term vitality and viability of the centre.

Ilkley Town Centre

- 4.28 Ilkley town centre accommodates 248 retail, leisure and service units amounting to approximately 35,608 sq.m of commercial floorspace. The centre performs a role that extends beyond serving local day-to-day needs, attracting visitors from a wider catchment owing to its strong retail, leisure and tourism offer. The centre is characterised by a high-quality environment, a strong independent sector and a relatively affluent customer base, all of which contribute to its distinctive character.
- 4.29 The proportion of comparison units within the centre is significantly above the national average and represents one of Ilkley's key strengths. The comparison offer is focused around The Grove and includes a wide range of independent boutiques, specialist retailers and premium national operators. Businesses such as Oliver Bonas and Mint Velvet contribute to a high-quality shopping environment which differentiates Ilkley from many centres of a similar size. The breadth of the comparison offer reinforces the town's role as a destination for specialist and higher-value shopping.
- 4.30 Whilst the number of convenience units is below the national average, the proportion of floorspace occupied by convenience operators is above average, reflecting the presence of larger format stores including Booths. These operators provide an important anchor within the town centre and are complemented by a range of independent

food retailers, delicatessens and specialist food stores. As a result, the convenience offer is generally stronger than the unit composition alone would suggest.

- 4.31 Leisure provision within the centre is broadly in line with national averages and forms an important component of the overall offer. The centre accommodates a wide range of cafés, restaurants, bars and coffee shops, many of which are independently operated. Cultural attractions including King's Hall and Ilkley Cinema further strengthen the leisure offer and contribute to activity throughout the day and into the evening.
- 4.32 The provision of retail services is above the national average and includes a range of health and beauty operators, hairdressers and other personal services distributed throughout the centre. Financial and business services are represented at broadly expected levels and include banks, estate agents, solicitors and other professional services which provide an important supporting function within the town centre.
- 4.33 Vacancy levels within Ilkley are considerably below national averages in both unit and floorspace terms. Vacant units are dispersed throughout the centre and there is no significant concentration of vacancy within any particular location. This contributes positively to the continuity of active frontages and reflects the continued attractiveness of the town centre to both independent and national operators.

Bingley Town Centre

- 4.34 Bingley town centre accommodates 149 retail, leisure and service units amounting to approximately 23,844 sq.m of commercial floorspace. The centre performs an important local service role within the Aire Valley and benefits from its proximity to the Leeds and Liverpool Canal and the Five Rise Locks, which contribute to its appeal as a visitor destination. The centre is focused around Main Street and is characterised by a strong independent sector and a relatively compact commercial core.
- 4.35 The proportion of comparison floorspace and units within the centre is below the national average, reflecting the centre's primarily local role. The comparison offer is largely made up of smaller independent retailers, with a relatively limited presence of national multiple operators. As a result, the centre performs more of a specialist and convenience shopping function than a major comparison shopping destination.
- 4.36 The convenience offer occupies a greater proportion of floorspace than is typically seen nationally, reflecting the presence of larger food retailers including Aldi and Lidl. Whilst the number of convenience units is broadly in line with national averages, the scale of provision supports regular footfall and helps to reinforce the centre's role in meeting day-to-day shopping needs.
- 4.37 Leisure provision represents a significant component of the centre's overall composition and is one of Bingley's principal strengths, including Bingley Theatre. The centre accommodates a range of cafés, restaurants and public houses, many of which benefit from the town's attractive canal-side setting. The leisure offer contributes positively to activity throughout the day and into the evening and supports the centre's role as a destination for visitors as well as local residents.
- 4.38 The provision of retail services is significantly above the national average and includes a wide range of hairdressers, beauty salons and other personal service operators. Financial and business services are also represented at above average levels and include banks, estate agents and professional services. Together, these uses form an important component of the town centre offer and contribute to regular day-to-day activity.
- 4.39 Vacancy levels within the centre are below national averages in both unit and floorspace terms. Vacant units are dispersed throughout the centre and there is no significant concentration of vacancy within any particular location.

This contributes positively to the continuity of active frontages and reflects the relatively stable performance of the centre.

- 4.40 Overall, Bingley provides a retail, leisure and service offer which is appropriate to its role as a local town centre. Whilst the comparison offer is relatively limited, the strength of the leisure sector, the above average provision of retail and business services and the relatively low vacancy rate all contribute positively to the vitality and viability of the centre.

District Centre Summary

- 4.41 In addition to the town centres, Nexus has also visited and surveyed the district centres within the authority area, comprising Five Lane Ends, Gillington, Great Horton, Greengates, Thornbury and Tong Street district centres. A summary of the unit and floorspace composition is found in tables 4.4 and 4.5 below.

Table 4.4: District Centre Unit Composition at February 2026

District Centre	Total Units	Comparison	Convenience	Financial	Leisure	Retail Service	Vacant
Five Lane Ends	38	23.7%	13.2%	2.6%	21.1%	31.6%	7.9%
Gillington	89	13.5%	10.1%	5.6%	27.0%	21.3%	22.5%
Great Horton	72	12.5%	16.7%	5.6%	26.4%	29.2%	9.7%
Greengates	34	17.6%	14.7%	0.0%	41.2%	14.7%	11.8%
Thornbury	20	30.0%	15.0%	5.0%	20.0%	30.0%	0.0%
Tong Street	38	23.7%	23.7%	2.6%	39.5%	7.9%	2.6%
National Average	-	25.9%	9.4%	7.8%	26.7%	15.9%	14.0%

Source: Composition of centre derived from Nexus Planning survey of February 2026; UK Average from Experian Goad report of September 2025

Table 4.5: District Centre Floorspace Composition at February 2026

District Centre	Total Floorspace	Comparison	Convenience	Financial	Leisure	Retail Service	Vacant
Five Lane Ends	23,342	28.9%	42.3%	0.4%	16.8%	7.5%	4.1%
Gillington	24,617	37.3%	38.7%	0.6%	6.3%	7.3%	9.8%
Great Horton	6,934	15.2%	16.4%	4.8%	27.0%	26.2%	10.4%
Greengates	16,867	42.2%	38.8%	0.0%	12.1%	3.9%	3.0%
Thornbury	19,190	39.5%	50.3%	0.6%	2.8%	6.7%	0.0%
Tong Street	10,502	27.3%	21.7%	4.7%	43.2%	2.6%	0.5%
National Average	-	28.6%	15.4%	6.0%	27.9%	7.3%	14.3%

Source: Composition of centre derived from Nexus Planning survey of February 2026; UK Average from Experian Goad report of September 2025

- 4.42 A copy of the healthchecks are provided at Appendix 4 and a summary is provided in table 4.6 below.

Table 4.6: District Centre Summary

Centre	Summary
Five Lane Ends	Five Lane Ends is a healthy district centre with a strong day-to-day shopping function centred around Morrisons and Enterprise 5 Retail Park where a new Food Warehouse and Marie Curie charity shop recently opened. The centre offers a good range of

Centre	Summary
	shops and services, with service offer particularly well represented. Vacancy levels are low and compare favourably with national averages, suggesting that occupier demand remains relatively strong. While the leisure and business service offer is more limited than might typically be expected of a centre of this nature, the strength of the convenience provision ensures that the centre continues to meet the needs of the surrounding residential area effectively.
Girlington	Girlington is one of the larger and more distinctive district centres in the district, combining a strong independent sector with several well-known national retailers. Morrisons provides an important anchor, while the centre's specialist retail offer and extensive food and drink provision attract visitors from beyond the immediate catchment. Vacancy remains a challenge, with a noticeable number of empty units across the centre, although this is balanced by the overall strength and diversity of the offer. The centre remains a busy and important destination for both shopping and leisure activities.
Great Horton	Great Horton is a relatively small but well-occupied district centre that serves its local community effectively. The centre has a strong independent offer, with a range of convenience retailers, specialist shops and business services helping to meet everyday needs. Vacancy levels are low and do not currently raise significant concerns. Although the leisure and business service offer is fairly limited, this is consistent with the centre's role as a neighbourhood-focused destination rather than a wider shopping or leisure hub.
Greengates	Greengates performs well as a district centre, supported by several large-format retailers including Sainsbury's, Asda, Matalan and B&M. These operators provide a strong retail foundation and attract regular footfall from a wide catchment area. Vacancy levels are relatively low, reflecting the centre's continued attractiveness to occupiers. While there is a notable absence of financial and business services, the strength of the retail offer and the presence of a range of national operators help to maintain the centre's overall vitality and appeal.
Thornbury	Thornbury is a healthy retail-focused district centre anchored by Morrisons, Iceland and the wider Woodhall Retail Park. Larger operators such as B&Q, B&M and Bargain Buys give the centre a broader shopping role than many district centres and help to draw visitors from a wider area. Vacancy levels are low and indicate a generally resilient centre. Leisure and business services are less prominent, but the strength of the retail offer ensures that Thornbury continues to function as an important shopping destination for surrounding residents.
Tong Street	Tong Street is a healthy district centre with a strong value-led offer and a distinctive mix of retail and leisure uses. Anchored by Iceland, Farmfoods and Buzz Bingo, the centre attracts consistent footfall throughout the day and benefits from a wider range of food and drink businesses than is often found in comparable centres. Recent permission has also been granted for a new padel centre next to the Buzz Bingo, which will further add to the composition. Vacancy levels are exceptionally low, which is a particular strength. Retail and business services are more limited, but the centre's established convenience and leisure offer enables it to continue serving the needs of its local catchment effectively.

Local Centre Summary

4.43 In addition to the city, town and district centres, Nexus has also visited and surveyed the local centres within the authority area, comprising 47 local centres. A copy of the completed matrix is provided at Appendix 5.

4.44 Nexus has used a matrix to determine how the commercial provision is performing and as such, where they should sit within the recommended hierarchy. As set out above, the matrix is based on an assessment of the provision of facilities, ATM services and the proportion of national operators, types and scale of facilities provided and vacancies which were located in each centre. A summary of the unit composition is provided in table 4.7 below.

Table 4.7: Local Centre Unit Composition

Local Centre	Total Units	Comparison	Convenience	Financial	Leisure	Retail Service	Vacant
Barkerend	27	11.1%	14.8%	3.7%	11.1%	22.2%	37.0%
Addingham	25	12.0%	0.0%	8.0%	28.0%	20.0%	32.0%
Allerton	38	10.5%	10.5%	5.3%	31.6%	21.1%	21.1%
Baildon	69	23.2%	2.9%	11.6%	29.0%	26.1%	7.2%
Bolton Junction	36	27.8%	5.6%	5.6%	27.8%	25.0%	8.3%
Bankfoot	22	13.6%	13.6%	4.5%	36.4%	13.6%	18.2%
Burley in Wharfedale	36	11.1%	8.3%	8.3%	41.7%	25.0%	5.6%
Carlisle Road-Whetley Hill	82	15.9%	12.2%	8.5%	13.4%	20.7%	29.3%
Clayton	24	0.0%	4.2%	8.3%	41.7%	33.3%	16.7%
Cottingley	14	7.1%	21.4%	0.0%	35.7%	21.4%	14.3%
Cross Road	12	8.3%	8.3%	8.3%	50.0%	16.7%	8.3%
Crossflats	14	14.3%	14.3%	0.0%	35.7%	35.7%	0.0%
Cullingworth	15	26.7%	20.0%	0.0%	20.0%	33.3%	0.0%
Denholme	14	14.3%	21.4%	0.0%	28.6%	7.1%	28.6%
Duckworth Lane	89	23.6%	16.9%	16.9%	21.3%	12.4%	9.0%
Eccleshill	35	14.3%	8.6%	5.7%	34.3%	34.3%	2.9%
Fell Lane (Oakworth Road)	17	0.0%	17.6%	5.9%	41.2%	35.3%	0.0%
Frizinghall	34	8.8%	14.7%	17.6%	20.6%	11.8%	26.5%
Harden	9	11.1%	33.3%	0.0%	22.2%	33.3%	0.0%
Haworth	56	48.2%	8.9%	0.0%	32.1%	3.6%	7.1%
Heaton	14	14.3%	21.4%	0.0%	35.7%	14.3%	14.3%
Holme Wood	17	17.6%	11.8%	5.9%	17.6%	0.0%	47.1%
Horton Grange	39	12.8%	7.7%	5.1%	35.9%	15.4%	23.1%
Idle	71	8.5%	11.3%	7.0%	33.8%	28.2%	11.3%
Laisterdyke	71	33.8%	5.6%	2.8%	33.8%	11.3%	12.7%
Leeds Road	75	52.0%	9.3%	0.0%	16.0%	12.0%	10.7%
Lidget Green	31	9.7%	12.9%	12.9%	35.5%	16.1%	12.9%
Low Moor	13	23.1%	7.7%	0.0%	46.2%	7.7%	15.4%

Local Centre	Total Units	Comparison	Convenience	Financial	Leisure	Retail Service	Vacant
Marshfields	55	23.6%	12.7%	3.6%	29.1%	18.2%	12.7%
Menston	18	5.6%	11.1%	5.6%	33.3%	44.4%	0.0%
Mill Hey (Haworth)	27	22.2%	7.4%	0.0%	44.4%	18.5%	7.4%
Oak Lane	59	35.6%	16.9%	3.4%	23.7%	8.5%	11.9%
Oakworth	9	11.1%	11.1%	0.0%	33.3%	44.4%	0.0%
Princeville	23	21.7%	13.0%	4.3%	21.7%	26.1%	13.0%
Queensbury	61	9.8%	11.5%	16.4%	27.9%	24.6%	9.8%
Riddleston	24	12.5%	8.3%	8.3%	29.2%	29.2%	12.5%
Saltaire	64	26.6%	7.8%	12.5%	26.6%	23.4%	3.1%
Silsden	76	19.7%	11.8%	10.5%	25.0%	26.3%	6.6%
Steeton with Eastburn	13	0.0%	30.8%	0.0%	38.5%	30.8%	0.0%
Sticker Lane	21	14.3%	4.8%	9.5%	38.1%	19.0%	14.3%
Thornton	48	20.8%	6.3%	8.3%	33.3%	16.7%	14.6%
Undercliffe	42	11.9%	11.9%	7.1%	21.4%	23.8%	23.8%
White Abbey Road	34	52.9%	8.8%	0.0%	8.8%	11.8%	17.6%
Wibsey	62	14.5%	8.1%	14.5%	19.4%	29.0%	14.5%
Wilsden	26	15.4%	15.4%	7.7%	30.8%	30.8%	0.0%
Wrose	12	16.7%	8.3%	0.0%	33.3%	25.0%	16.7%
Wyke	62	17.7%	11.3%	3.2%	24.2%	21.0%	22.6%
National Average	-	25.9%	9.4%	7.8%	26.7%	15.9%	14.0%

5. Population and Expenditure

Study Area and Household Survey

- 5.1 A survey of 1,516 households was undertaken by NEMS Market Research in March 2026 in order to ascertain where residents go to undertake a range of shopping and leisure activities.
- 5.2 The below Table 5.1 identifies the postcode sectors which define each of the zones. A plan defining the geographic extent of the Study Area and the below zones is provided at Appendix 1.

Table 5.1: Study Area Zones by Postcode Sector

Survey Zone	Postcode Sectors
1	BD22 7, BD22 8, BD22 9, BD22 0, BD20 6, BD20 7, BD20 8, BD22 6
2	BD20 9, BD20 0, LS29 8, LS29 9, LS29 0
3	BD16 3, BD20 5, LS20 8, LS20 9, LS21 3, LS29 6, LS29 7
4	BD21 1, BD21 2, BD21 3, BD21 4, BD21 5
5	BD13 4, BD13 5, BD15 0, BD16 1, BD16 2, BD16 4
6	BD9 5, BD9 6, BD15 7, BD15 8, BD15 9, BD18 4
7	BD13 1, BD13 2, BD13 3, BD14 6
8	BD6 2, BD12 7, BD12 8, BD12 9, BD12 0
9	BD4 6, BD4 9, BD4 0, BD11 1, BD11 2, LS28 8
10	BD3 8, BD3 9, BD4 7, BD4 8
11	BD5 7, BD5 8, BD5 9, BD5 0, BD6 1, BD6 3, BD7 3, BD7 4
12	BD1 1, BD1 2, BD1 3, BD1 4, BD1 5, BD7 1, BD7 2, BD8 7, BD8 8, BD8 9, BD8 0
13	BD2 1, BD2 2, BD2 3, BD2 4, BD3 7, BD3 0
14	BD9 4, BD18 1, BD18 2, BD18 3
15	BD17 5, BD17 6, BD17 7, LS19 7, BD10 8, BD10 9, BD10 0

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

Study Area Population – Experian Growth Scenario

- 5.5 It is important to state at the outset of this study that any medium to long term forecasts should be treated with caution. They are influenced by the dynamic changes in economic, demographic, lifestyle and market trends; including the rise of online shopping over the last decade, and wider implications on the market across the country and further afield.
- 5.6 The population within each postcode sector and each zone at 2026 has been calculated using Experian Micromarketer G3 data (2025 estimate, which was issued in March 2026).

5.7 Table 5.2 below sets out Experian's population projections for each zone in the Study Area.

5.8 Based on Experian's population projections, we estimate that the Study Area population will increase from 623,626 persons at 2026 to 644,559 persons at 2043. This equates to an increase of 20,933 persons (or 3.4% over the 17-year period).

Table 5.2: Estimated Study Area Population by Survey Zone

Zone	2026	2031	2036	2041	2043
1	51,211	51,768	52,259	52,803	53,026
2	30,560	30,423	30,360	30,022	29,867
3	45,886	46,067	46,249	46,154	46,953
4	27,072	27,414	27,710	28,137	28,394
5	32,312	32,511	32,572	32,525	32,478
6	40,036	40,413	40,916	41,546	41,851
7	29,338	29,615	29,871	30,169	30,259
8	25,924	26,146	26,304	26,517	26,622
9	41,085	41,514	41,799	42,094	42,213
10	29,400	29,834	30,353	31,069	31,367
11	72,448	73,202	74,038	75,391	75,984
12	58,788	59,399	60,377	61,662	62,223
13	49,996	50,441	50,949	51,618	51,931
14	28,311	28,444	28,683	28,998	29,175
15	61,259	61,607	61,894	62,156	62,216
Total	623,626	628,798	634,334	640,861	644,559

Source: Table 1 of Appendix 6

Alternative Population Growth Scenario

5.9 As noted earlier in the Study, the future growth in terms of housing and population across the district is of significant importance to the overarching aspirations of the local plan. As such, we have also sought to provide an alternative scenario for the purposes of the capacity assessment, which models the level of growth which is being planned for by Bradford Council.

5.10 The Council has provided the estimated housing growth across the plan period which is assigned to each local plan allocation and strategic growth area.

5.11 As such, using the housing growth data provided and assigning this on a location-specific basis using the adopted 15 zones used for the purposes of this Study, we are able to forecast patterns of zonal population growth between 2026 and 2043. Importantly, this second scenario assumes a higher level of population growth across the local plan period, based on the provision of additional dwellings, but specifically the growth is estimated to be particularly high in Zone 12, which covers Bradford city centre. This reflects the ambitious aspirations of the Council to significantly increase the city centre living opportunities through the regeneration growth areas. Other key areas of growth include Keighley, Shipley and Bingley settlements.

5.12 We provide the comparable population growth assumptions based on the planned housing growth below.

Table 5.3: Estimated Study Area Population by Survey Zone – Housing Growth Scenario

Zone	2026	2031	2036	2041	2043
1	51,211	51,590	51,943	52,716	52,788
2	30,560	31,242	33,606	34,830	34,830
3	45,886	46,750	47,907	48,075	48,075
4	27,072	28,483	30,226	31,687	31,687
5	32,312	33,591	34,947	36,229	36,469
6	40,036	41,035	42,127	43,447	43,447
7	29,338	30,278	31,534	33,335	33,578
8	25,924	26,366	27,178	27,982	28,148
9	41,085	41,518	42,434	43,107	43,288
10	29,400	29,833	30,749	31,422	31,603
11	72,448	73,501	75,124	77,344	77,692
12	58,788	62,382	68,260	73,909	74,368
13	49,996	51,132	52,025	52,960	52,960
14	28,311	30,171	32,031	33,929	33,929
15	61,259	61,808	62,106	62,293	62,293
Total	623,626	639,682	662,196	683,266	685,155

Source: Table 1 of Appendix 6

- 5.13** Based on the population projections taken from the planned housing growth, we estimate that the Study Area population will increase from 623,626 persons at 2026 to 685,155 persons at 2043. This equates to an increase of 61,529 persons (or 9.9% over the 17-year period).
- 5.14** It is important to note that this is significantly higher than that which is estimated by Experian and is based on the assumption that the housing allocations and regeneration growth areas will come forward as currently planned.
- 5.15** We provide below an overview of the expenditure associated with the Experian growth scenario, with the comparable exercise provided for the housing growth scenario provided at Appendix 4b.

Retail Expenditure – Experian Scenario

- 5.16** In order to calculate per capita convenience and comparison goods expenditure, we have utilised Experian Micromarketer G3 data, which provides detailed information on local consumer expenditure that takes into consideration the socio-economic characteristics of the local population. The base year for the Experian expenditure data is 2024. Our methodology takes account of the fact that some special forms of trading expenditure¹⁸ is not available to support retail floorspace, and then allows for increases in per capita expenditure growth on an annual basis.
- 5.17** Figure 5 of Appendix 3 of ERPBN23 provides estimates in respect of the proportion of convenience and comparison goods expenditure that will be committed through special forms of trading both now and in the future. We have ‘stripped out’ any survey responses which relate to expenditure committed via special forms of trading and have

¹⁸ Identified as comprising sales via the internet, mail order, stalls and markets, door-to-door and telephone sales (i.e. all non-store sales).

instead made an allowance derived from Experian's recommendations (which we consider to be the most appropriate means by which to account for such expenditure).

5.18 In considering special forms of trading, many products which are ordered online are actually sourced from a store's shelves or stockroom in practice (this is particularly the case with convenience goods). As such, expenditure committed in this manner acts to sustain shops and can be considered 'available' to support floorspace within the Study Area. In considering special forms of trading, Experian states that the following factors could temper the downward impact:

- Many stores sell online but source sales from regular stores rather than warehouses, implying an increase in required store floorspace to cater for rising internet sales.
- Even if non-store retailing outpaces store-based shopping as assumed over the next two decades, store-based shopping is still expected to expand mildly in per capita terms, at 0.2% per annum in the long-term.
- Click-and-collect is an increasingly popular choice with consumers. Since this requires a bricks-and-mortar presence in easily accessible locations, this is largely space demand neutral.
- Home delivery with the goods delivered sourced from warehouses is not space demand neutral in the way that click-and-collect is. It presents a major potential threat to future demand for retail floorspace in the high street. Demand for retail floorspace would ease if in the future supermarkets moved increasingly to a centralised system to reduce pressure on stores. But it still appears that most retailers opt to distribute from stores rather than a centralised warehouse. While warehouse space has increased, this has come mainly from on-line sellers and, in the case of supermarkets, Aldi and Lidl, rather than a concerted move on the part of retailers in general.
- A significant development is multi-channelling, where internet shopping actually drives demand for traditional outlets. An increasing number of retailers are using bricks-and-mortar stores as a showroom for products, a service location and collection/drop-off points for online orders. In-store product and services offer forms part of a co-ordinated multi-channel strategy and will continue to support demand for retail space.

5.19 Accordingly, in order not to overstate the influence of special forms of trading on retailers, our methodology utilises Experian's 'adjusted' allowance for special forms of trading (which is provided at Figure 5 of ERPBN23). This allowance indicates that 5.4% of convenience goods expenditure and 26.1% of comparison goods expenditure is 'lost' from shops at base year 2024 through special forms of trading purchases.

5.20 Having made an allowance for special forms of trading, we then take account of projected changes in expenditure in accordance with the recommendations provided by Figure 6 of Appendix 3 of ERPBN23. Experian provides overall growth rates and 'adjusted' rates, which account for any additional increases in expenditure lost to special forms of trading. The latest growth rates suggest that growth in comparison goods expenditure should pick up in the next few years as confidence in the economy returns, with this following a number of turbulent years following the start of the Covid-19 pandemic in 2020.

5.21 This Study utilises the most up to date Experian expenditure data and growth forecasts. However, longer term growth forecasts (beyond the next ten years) should be treated with caution given the inherent uncertainties associated with predicting the performance of the economy over time (particularly in the current economic, health and political climates). As such, assessments of this nature should be reviewed on a regular basis to ensure that forecasts over the medium and longer term reflect changing circumstances.

Convenience Goods Expenditure

- 5.22 Taking into account the Study Area resident population and the available per capita convenience goods expenditure, we estimate that £1,442.1m¹⁹ of convenience goods expenditure originates within the Study Area at 2026. Table 5.4 indicates that available Study Area convenience goods expenditure is forecast to drop to £1,398.7m by 2043.

Table 5.4: Total Available Study Area Convenience Goods Expenditure

2026 (£m)	2031 (£m)	2036 (£m)	2041 (£m)	2043 (£m)
1442.1	1416.1	1406.4	1399.4	1,398.7

Note: In 2024 prices

- 5.23 Table 5.5 indicates that this represents a reduction in the level of convenience expenditure available across the Study Area between 2026 and 2043.

Table 5.5: Growth in Available Study Area Convenience Goods Expenditure

Growth 2026-2031 (£m)	Growth 2026-2036 (£m)	Growth 2026-2041 (£m)	Growth 2026-2043 (£m)
-26.0	-35.7	-42.6	-43.4

Note: In 2024 prices

- 5.24 We have assumed that 75% of available convenience goods expenditure would take the form of main food shopping and that 25% would take the form of top-up shopping (which relates to smaller purchases often made using a basket rather than a shopping trolley).²⁰

Comparison Goods Expenditure

- 5.25 For comparison goods, Table 5.6 sets out our estimate that the resident population of the Study Area will generate £1,664.6m of comparison goods expenditure at 2026. Available comparison goods expenditure is then forecast to increase to £2,377.5m at 2043.

Table 5.6: Total Available Study Area Comparison Goods Expenditure

2026 (£m)	2031 (£m)	2036 (£m)	2041 (£m)	2043 (£m)
1,664.6	1,810.6	2,028.8	2,272.7	2,377.5

Note: In 2024 prices

- 5.26 The identified increase in comparison goods expenditure growth is substantial, but it represents a level of annual growth that is more circumspect than that which has been achieved in the past. This is due to both a reduction in the overall level of growth when compared to that achieved in the early part of this millennium, and as a result of further forecast increases in expenditure committed via special forms of trading (most obviously, internet shopping).
- 5.27 As the below Table 5.7 identifies, our assessment estimates that there will be an increase of £712.9m (equating to 42.8%) in respect of Study Area comparison goods expenditure between 2026 and 2043.

¹⁹ In 2024 prices, as is every subsequent monetary reference.

²⁰ This is a standard split applied in undertaking this exercise.

Table 5.7: Growth in Available Study Area Comparison Goods Expenditure

Growth 2026-2031 (£m)	Growth 2026-2036 (£m)	Growth 2026-2041 (£m)	Growth 2026-2043 (£m)
145.9	364.2	608.1	712.9

Note: In 2024 prices

5.28 We sub-divide comparison goods expenditure into eight categories, these being: ‘DIY’, ‘Electrical’ and ‘Furniture’ (collectively referred to as bulky goods); and ‘Clothing and Footwear’, ‘Books, CDs and DVDs’, ‘Health, Beauty and Chemist Goods’, ‘Small Household Goods’, and ‘Toys, Games, Bicycles and Recreational Goods’ (collectively referred to as non-bulky goods). The proportion of expenditure directed to each sub-category is estimated by Experian on a zonal basis. Experian’s estimates are reflected in the detailed expenditure tables set out at Table 7b of Appendix 6 of this report.

5.29 In considering expenditure growth, it should be noted that not all growth arising within the Study Area is available to support additional floorspace in the Bradford authority area. Instead, account needs to be taken of:

- the market share of expenditure secured by retailers within the Bradford authority area (and the fact that many needs are successfully met outside the district);
- the claim made by existing retailers on expenditure growth (the future efficiency of retail floorspace); and
- the expenditure that will be claimed by committed retail developments.

5.30 These issues are addressed in the assessment of retail capacity provided in Section 7 of this report.

6. Market Research – Household Surveys

Market Share Analysis: Household Survey Results

- 6.1 The NEMS household survey identifies where residents travel to undertake a range of shopping and leisure activities. The summary of results provided in this section focuses on the market share of shopping trips secured by retail venues for various types of shopping.
- 6.2 In reviewing the Study Area, it is important to recognise that the vast majority of convenience goods expenditure generated within a given area is generally claimed by local foodstores. This is because shoppers look to source convenience goods close to home. Comparison goods shopping is more likely to result in longer trips to source goods at higher order destinations. As such, it is to be expected that a substantial proportion of comparison goods shopping trips 'leak' outside of the Study Area to shopping venues offering greater choice.
- 6.3 The household survey is reproduced as part of Appendix 2 of this Study. In retail terms, the principal purpose of the survey is to establish:
- patterns of convenience goods spending, based on the location of:
 - the shops or shops respondents last visited and visited 'the time before last' to undertake their main food shop; and
 - the shop or shops respondents last visited and visited 'the time before last' to undertake their main top-up food shop.
 - patterns of comparison goods spending, based on the local of the respondent's last shopping trip to purchase the following types of comparison goods:
 - clothing and footwear;
 - books, CDs, DVDs and stationery;
 - small household goods, such as home furnishings, clocks, jewellery, glass and china;
 - toys, games, bicycles and recreational goods;
 - chemist goods, including health and beauty items;
 - electrical goods, such as televisions, washing machines and computers;
 - DIY and gardening goods; and
 - furniture, carpets and floor coverings.
- 6.4 The analysis which follows considers market share for the above sub-sectors. Our assessment is based on the market share of expenditure to particular 'bricks and mortar' retail destinations. For comparison goods, the zonal market share secured by each retail destination for each of the above eight sub-sectors is taken directly from the corresponding household survey question responses.
- 6.5 For convenience goods, the methodology differs. We have found that retail assessments of this nature can often overstate the turnover of discount foodstores and understate the turnover of larger format stores operated by the 'big four'. This is because apportioning 'main food' convenience goods expenditure in accordance with a household survey fails to account for the fact that goods are generally cheaper at discount foodstores. Such foodstores are also typically of a lesser scale and may not sell all products (for example, they may have a lesser range in respect of ingredients and in respect of ready meals). The consequence of this is that trips to a discount foodstore may often result in a lesser level of expenditure than trips to a large food superstore.

- 6.6 For convenience goods, our household survey asks respondents the shop they last visited and visited ‘the time before last’ to undertake their main food shop.

Non-Store Retailing or Special Forms of Trading

- 6.7 Special forms of trading (SFT) are defined by Experian as sales via the internet, mail order, stalls and markets, vending machines, door-to-door and telephone sales, including online sales by supermarkets, department stores and catalogue companies.

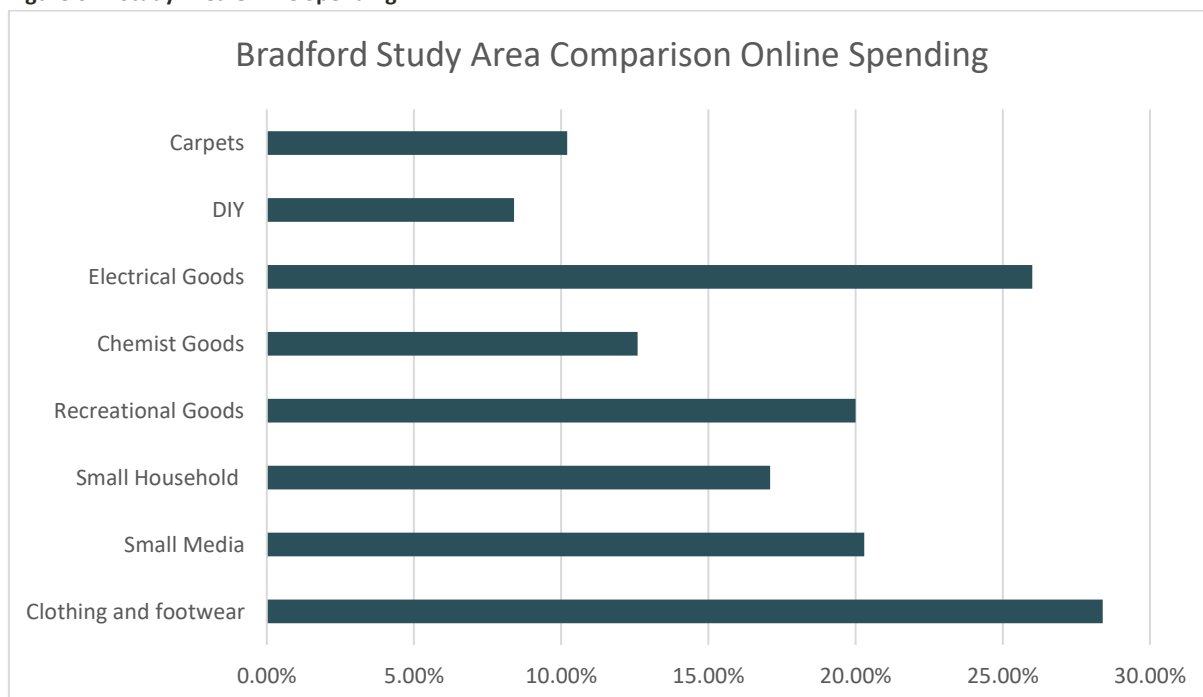
Convenience Goods Online Shopping

- 6.8 The household survey asked residents of the Study Area where they normally undertake their main food and grocery shopping.
- 6.9 Across the Study Area, 9.4% of respondents usually shop online for their main food shop (Question 1 of the Household Survey). As set out in Section 3, the UK average for online convenience shopping in 2024 is 17.3%. As such, the take-up of online convenience shopping in the Study Area is considerably below that of the UK average. This is likely to be indicative of both ease of access to local foodstores and the make-up of the local catchment within which residents prefer to shop in store, rather than online.

Comparison Goods Online Shopping

- 6.10 The household survey asked where respondents usually shop for different types of comparison goods. The findings are presented in the figure below which shows that the take-up for online shopping varies across the categories, from 8.4% (DIY and Gardening goods) to 28.4% (clothing and footwear). On average, within the Study Area, 17.9% of respondents shop online for comparison goods, which is below the UK average of 32.5%.

Figure 6.1: Study Area Online Spending



Source: NEMS Household Survey

Retail Goods Market Share Analysis

Convenience Goods Market Share

- 6.11 Our analysis begins by reviewing the retention of convenience goods expenditure within each of the 15 Study Area zones (i.e. the proportion of expenditure originating within a given zone which is claimed by retailers located within that same zone).
- 6.12 This enables an understanding of whether residents are having to travel to meet their convenience goods shopping requirements, or if they are typically able to meet their needs in proximity to where they live. It is accepted that some respondents will live towards the boundary of their respective zones and some trips will therefore be able to be undertaken to nearby zones in a sustainable manner.
- 6.13 Table 6.1 indicates that in terms of convenience goods shopping, the highest main food convenience goods retention rates are within Zones 2, 3 and 4, where over 60% of corresponding residents' expenditure on main food shopping is being spent at destinations also located in the same respective zones. Within Zone 4, the main food retention rate is 90.4%, and is the highest across the Study Area.
- 6.14 Within Zone 2, which covers areas of both Keighley and Ilkley, the principal main food convenience destinations for residents are principally located within Zone 2 and comprise the Tesco Superstore on Springs Lane (attracting 31.0% of residents' expenditure), the Booths in Ilkley (12.7%) and the Aldi on Keighley Road in Silsden (11.4%). For residents within Zone 3, the principal main food destinations include the Aldi in Guiseley (located outside of the Bradford authority area) attracting 28.8% of main food shopping trips, followed by the Morrisons in Guiseley (19.5%).
- 6.15 For Zone 4 residents, main food shopping trips are spread across the Aldi at Alexandra Mills Retail Park (25.4%), followed by the Asda in Keighley (24.8%) and the Morrisons in Keighley (19.1%). Indeed, Zone 4 is particularly well provided for in terms of main food shopping destinations within and surrounding Keighley.

Table 6.1: Zonal Convenience Goods Retention Rates Across the Study Area at 2026

Zone	Main Food Shopping Zonal Retention Rate 2026 (%)	Top-Up Food Shopping Zonal Retention Rate 2026 (%)
1	0.5%	19.2%
2	64.7%	86.4%
3	68.5%	68.9%
4	90.4%	77.8%
5	46.2%	64.3%
6	12.5%	40.6%
7	31.7%	52.1%
8	27.3%	58.4%
9	2.9%	46.6%
10	57.0%	64.2%
11	44.5%	35.8%
12	37.8%	29.7%
13	32.8%	27.7%

Zone	Main Food Shopping Zonal Retention Rate 2026 (%)	Top-Up Food Shopping Zonal Retention Rate 2026 (%)
14	38.2%	42.3%
15	49.9%	59.7%

Source: Table 4 of Appendix 6 of this Study for 2026 market shares

- 6.16 In terms of top-up shopping retention rates, the highest levels are within Zones 2, 3, 4, 5 and 10, where over 60% of respective residents' top-up expenditure is retained, with the highest being within Zone 2. Top-up shopping trips are spread more evenly across a number of destinations across the Study Area as a whole, demonstrating that residents choose destinations closer to home to meet their top-up shopping needs, including Co-op, Sainsbury's Local, Tesco Express and smaller independent local facilities. Therefore, for example, for Zone 2 residents, Co-op stores within Ilkley and Keighley feature in the principal convenience destinations lists for residents' top-up shopping trips.
- 6.17 We would expect to see top-up shopping zonal retention rates to therefore be higher in most cases, which as we can see from Table 6.1 above, is the case across the majority of the zones.
- 6.18 Accordingly, we find that the broad zonal retention rates identified appear to appropriately reflect the geography of current provision. Both main and top-up convenience provision is particularly good within Zones 2 and 4, which cover Ilkley and Keighley and also reflects the geography of the authority area insofar as residents are more likely to be encouraged to shop locally to meet their needs.
- 6.19 The below Table 6.2 provides a different assessment of shopping patterns, this time setting out the proportion of zonal convenience goods expenditure which is claimed by operators located within the authority area. As such, this Table shows us the proportion of residents choosing destinations within the authority area as a whole to meet their needs.
- 6.20 Table 6.2 identifies that high levels of expenditure for both main and top up shopping is attracted to facilities located within the Bradford area across the majority of the key zones covering the authority area. This indicates a positive sign of convenience expenditure retention in the majority of the zones, and that existing facilities are retaining expenditure within the district.

Table 6.2: Bradford Convenience Goods Market Share by Zone at 2026

Zone	Main Food Shopping Bradford Market Share 2026 (%)	Top-Up Food Shopping Trips Bradford Market Share 2026 (%)
1	88.2%	93.0%
2	82.7%	96.1%
3	45.4%	62.4%
4	97.2%	97.7%
5	97.3%	98.2%
6	98.7%	98.1%
7	82.3%	85.8%
8	66.6%	81.2%
9	40.8%	60.7%
10	94.0%	88.5%
11	87.0%	77.0%

Zone	Main Food Shopping Bradford Market Share 2026 (%)	Top-Up Food Shopping Trips Bradford Market Share 2026 (%)
12	94.4%	96.8%
13	93.5%	96.9%
14	99.5%	97.4%
15	55.4%	51.7%
Total Study Area	80.7%	78.1%

Source: Table 4 of Appendix 6 of this Study for 2026 market shares

Comparison Goods Market Share

6.21 The below Table 6.3 identifies comparison goods shopping patterns, relating to the proportion of zonal comparison goods expenditure which is claimed by operators located within the authority area.

6.22 In practice, Bradford's operators claim more than six out of every ten pounds originating within all zones except Zones 7, 8 and 9, with the highest market share being from residents within Zones 5, 6, 13 and 14. The lowest proportion of expenditure spent at Bradford's destinations is recorded Zones 2, 8 and 9.

Table 6.3: Bradford Authority Comparison Goods Market Share by Zone at 2026

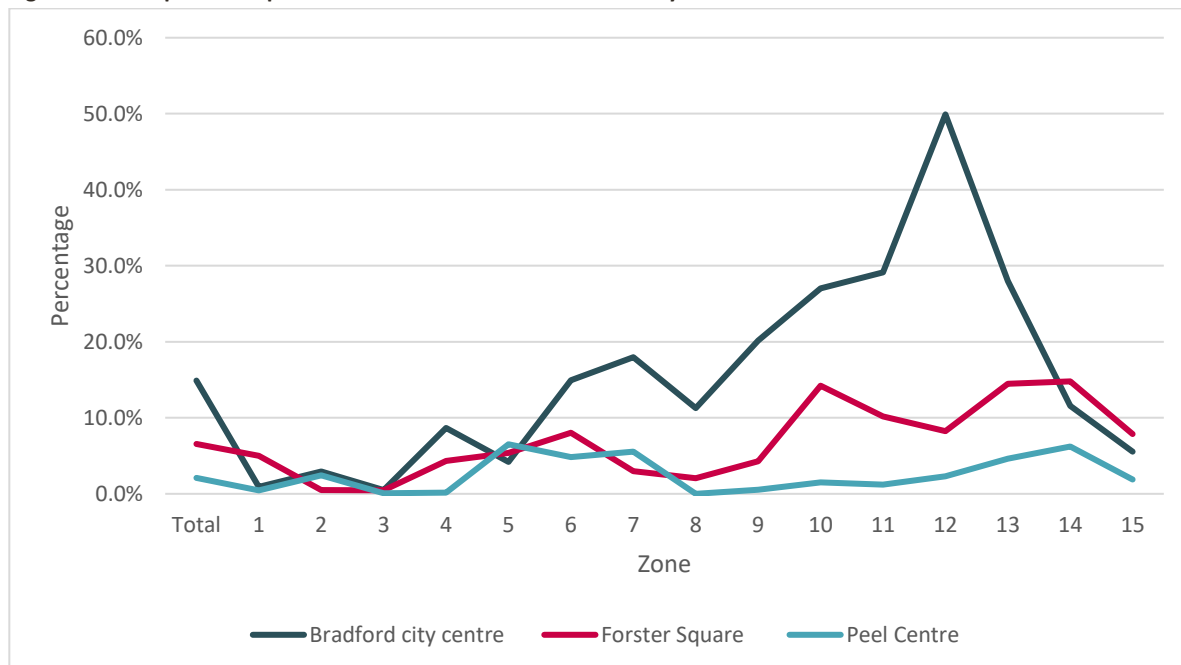
Zone	Comparison Goods Bradford Market Share 2026 (%)
1	64.0%
2	46.4%
3	63.3%
4	96.0%
5	90.6%
6	92.3%
7	59.7%
8	45.9%
9	48.2%
10	82.9%
11	75.6%
12	89.7%
13	91.5%
14	92.3%
15	69.7%
Authority Area	72.5%

Source: Table 4 of Appendix 6 of this Study for 2026 market shares

6.23 As part of the wider analysis of comparison goods shopping patterns, it is useful to look firstly at the proportion being spent within destinations in and surrounding Bradford city centre.

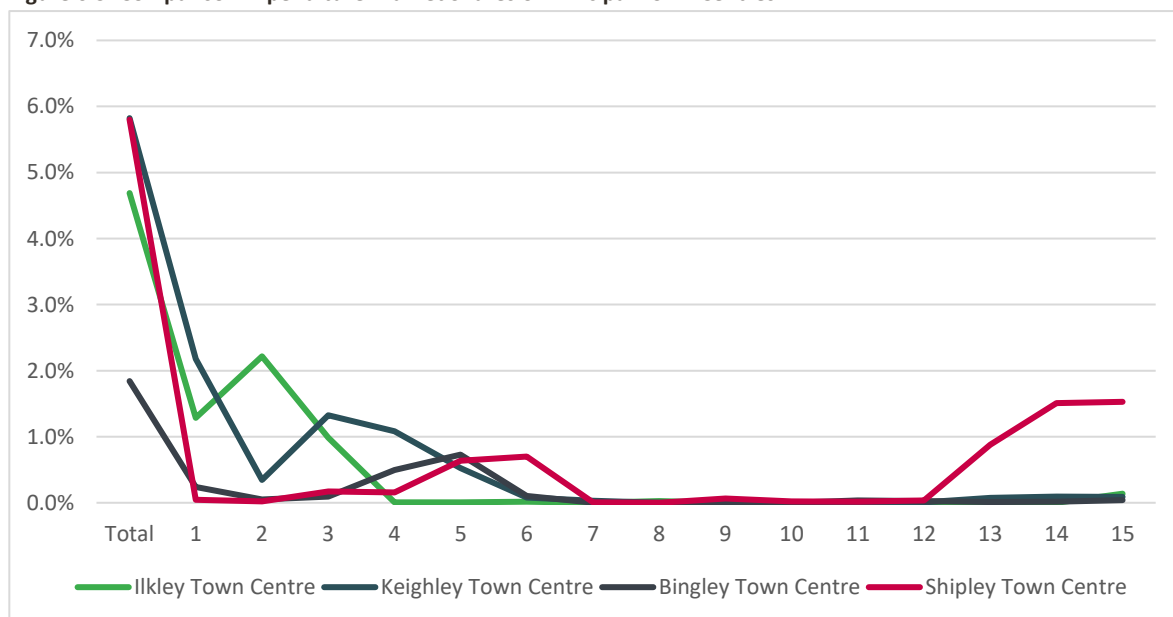
6.24 Figure 6.2 below shows the draw of the city centre facilities, and particularly from residents in Zone 10 to 13, which cover the central parts of the Study Area.

Figure 6.2: Comparison Expenditure Market Shares of Bradford City Centre Destinations



6.25 Figure 6.3 below then looks at the proportion of comparison expenditure attracted to the four principal town centres within the authority area. We can see from Table 6.3 we can see that overall, Keighley and Shipley town centres both attract the highest proportions of comparison expenditure at 5.8%, followed by Ilkley town centre at 4.7%.

Figure 6.3: Comparison Expenditure Market Shares of Principal Town Centres



Market Share Summary and Identification of Expenditure Claimed by Bradford Retailers

- 6.26 We identify the convenience goods, comparison goods, and overall market share of Study Area expenditure claimed by retailers located in Bradford in the below Table 6.6.
- 6.27 Bradford's convenience goods market share of 76.4% is marginally lower than its comparison goods market share of 72.5%. This demonstrates that the authority area has a broadly equivalent convenience and comparison offer.

Table 6.4: Comparison Goods Expenditure Retention and Leakage

Type of Expenditure	2026 Residents' Expenditure (£m)	2026 Market Share (%)
Study Area Convenience Goods Expenditure	£1,100.9m	76.4%
Study Area Comparison Goods Expenditure	£1,207.1m	72.5%

Source: Table 25 of Appendix 6

Note: Both presented in a consistent 2024 Prices

- 6.28 In conclusion, the household survey demonstrates that overall, Bradford's convenience goods retailers are able to appropriately serve residents of the authority area and those who live in a wider catchment area.
- 6.29 In respect of comparison goods, Bradford's retailers both within the town centres and at the out of centre facilities provide a good range of operators and attract relatively high levels of expenditure from the key central zones of the Study Area.
- 6.30 In our view, the identified survey results reflect the geography of the Study Area and the relative attraction of other nearby retail venues. Accordingly, where expenditure 'leaks' to destinations outside of Bradford this is still generally reflective of logical and sustainable travel patterns.

7. Assessment of Retail Capacity

- 7.1 Our retail capacity tables set out our step-by-step approach to estimating the expenditure surplus which is available to support additional retail floorspace and are provided at Appendix 6. A summary of our methodology, together with our findings, is provided below.

General Approach to Estimating Quantitative Capacity

- 7.2 Retail capacity modelling follows the basic principle that:

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

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

Methodology

- 7.4 We turn first to a description of the methodology we have employed in assessing quantitative need in both the comparison and convenience goods sectors in the period up to 2043. It is important to recognise, however, that the effects of expenditure growth over time become exponential. Thus, in looking to the period beyond 2036, the Council should adopt a plan, monitor and manage approach, so as to ensure that the forecast floorspace requirements are kept in line with changes in expenditure and changing methods of retailing.
- 7.5 There is no detailed guidance as to how to assess the quantitative need for retail development in the NPPF, or in the PPG. As a consequence, we have applied an eight step approach which has been tested at Examination
- 7.6 The eight broad steps to calculating the quantitative need are as follows:
- i) The first step is to establish the appropriate overall retail catchment area for the hierarchy of centres in Bradford, which is shown at Appendix 1. This catchment area covers the whole of the administrative area of Bradford, together with parts of the surrounding administrative areas.
 - ii) The second step is to assess the existing level of population and the existing volume of retail expenditure of those who reside within the overall catchment area.
 - iii) The third step is to establish where the retail expenditure of residents of the overall catchment area is currently spent, through the use of an empirical telephone survey of households and thereby establish the proportion of the retail expenditure of catchment area residents which is currently retained by town centres, retail parks and freestanding stores located within the overall catchment area – that is the aggregate retention rate within the district.
 - iv) The fourth step is to apply forecasts of population change and per capita expenditure change, so as to establish the overall level of projected growth in expenditure for residents of the overall catchment area, and an assessment of growth in retained expenditure, based, initially, on a constant retention scenario.
 - v) The fifth step is to make an allowance for growth in inflows of expenditure into the catchment area from those who reside outside in the catchment area. This can be achieved through the analysis of retail studies of adjacent authority areas .
 - vi) The sixth step is to make an allowance for under-trading, or over-trading in the base year, but only if this is justified on the basis of the clear empirical evidence.

- vii) The growth in retained expenditure (step iv), is added to the growth in inflows (step v), and an allowance for under / over-trading (step vi), so as to derive an initial expenditure surplus. Thus, the seventh step is to make allowance for 'claims' on the initial expenditure surplus, as a result of:
- Floorspace Efficiency Change for Existing Retailers (growth over time in turnover per sq. m sales area).
 - Growth Over Time in Special Forms Of Trading (SFT), which we derive from the final two columns of Figure 5 of Experian's Retail Planner Briefing Note 23 of March 2026.
 - Planning Commitments, for which information has been provided by Bradford Council and neighbouring authorities
- viii) The culmination of steps i) to vii) is the calculation of the residual expenditure pot which is potentially available for new retail floorspace, under a constant retention assumption. Thus, the final step, where appropriate, is to develop alternative scenarios for calculating growth in residual expenditure, based on:
- increases or decreases in the projected retention level; and
 - sensitivity testing of key assumptions, such as projected population change.

7.7 Our methodology in calculating comparison goods capacity necessarily departs from that used in considering convenience goods needs. This is because it is difficult to accurately estimate a benchmark turnover for comparison goods floorspace due to the large number of operators and the variation in the trading performance of floorspace, depending on its location, character, and the nature of the catchment.

7.8 As a consequence, we adopt the position for comparison goods floorspace that it is trading 'at equilibrium' at base year 2026 (i.e. our survey-derived turnover estimate effectively acts as benchmark). This is a standard industry approach.

Future Quantitative Convenience Goods Capacity

7.9 In identifying the requirement for additional convenience goods floorspace at this interim stage, we have assumed that the convenience destinations are performing in line with current expectations. We will however for the purposes of the final assessment undertake the review by adopting the estimated turnover of the existing collective provision (with reference to the shopping patterns established by the household survey) and comparing this to its benchmark turnover (with reference to company average sales densities).

7.10 As Table 7.1 demonstrates, convenience goods floorspace has an expected benchmark turnover of £963.4m at 2026, and a survey derived turnover of £1,100.9m at 2026. As a consequence, modest expenditure surplus of £113.0m is evident across the authority area at 2043.

Table 7.1: Quantitative Capacity for Additional Convenience Goods Floorspace in the Bradford Authority Area

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2026	963.4	1,100.9	137.5
2031	963.4	1,081.0	117.6
2036	960.5	1,073.6	113.1
2041	955.7	1,068.3	112.6
2043	954.8	1,067.8	113.0

Source: Table 6a of Appendix 6

Notes: Assumes constant market share (76.3%) of Study Area expenditure claimed by facilities within Bradford authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 4b of Experian Retail Planner Briefing Note 23; in 2024 prices.

7.11 The next step is to consider extant consents within the authority area, and how the turnover of these could potentially absorb any capacity identified. In this regard, we have consulted with the Council and having reviewed the commitments list provided, and it is clear that the principal convenience commitment is the proposed Sainsbury's at Great Horton Road in Bradford.

7.12 Table 7.2 identifies a monetary surplus throughout the plan period. In practice, our assessment suggests that there will be effectively a quantitative undersupply of floorspace (equating to between 9,700 sq.m and 11,700 sq.m of convenience goods floorspace at 2036). This remains broadly consistent throughout the plan period.

Table 7.2: Quantitative Capacity for Convenience Goods Floorspace in the Bradford Authority Area After Commitments

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2026	137.5	3.1	134.4	11,900	14,200
2031	117.6	3.1	114.5	10,100	12,100
2036	113.1	3.1	110.0	9,700	11,700
2041	112.6	3.0	109.6	9,800	11,700
2043	113.0	3.0	110.0	9,800	11,700

Source: Table 6d of Appendix 6

Notes: Assumes constant market share (76.3%) of Study Area expenditure claimed by facilities within Bradford authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 4a of Experian Retail Planner Briefing Note 23; in 2024 Prices

Future Quantitative Comparison Goods Capacity

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

7.14 As identified by the below Table 7.3, our assessment estimates that the comparison goods turnover of the authority area at 2026 is £1,207.0m.

7.15 Experian anticipates that improvements in the sales efficiency of existing comparison goods floorspace will outstrip per capita comparison goods expenditure growth in the very short term. As such, there is a deficit of expenditure identified within Bradford across the plan period, with -32.9m identified at 2031, which decreases to -£4.3m by 2043.

Table 7.3: Quantitative Capacity for Comparison Goods Floorspace in the Bradford Authority Area

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2026	1,207.0	1,207.0	0.0
2031	1,345.7	1,312.8	-32.9
2036	1,507.8	1,471.0	-36.7
2041	1,689.3	1,647.9	-41.4
2043	1,728.2	1,723.9	-4.3

Source: Table 26a of Appendix 6

Notes: Assumes constant market share (72.5%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 4b of Experian Retail Planner Briefing Note 23; in 2024 Prices

7.16 Table 7.4 identifies a monetary surplus throughout the plan period.

7.17 In practice, our assessment suggests that there will be effectively a quantitative oversupply of floorspace (equating to between 4,900 sq.m and 8,500 sq.m of comparison goods floorspace at 2036).

Table 7.4: Quantitative Capacity for Comparison Goods Floorspace in the Bradford Authority Area

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2025	0.0	0.0	0.0	0	0
2030	-32.9	0.0	-32.9	-5,000	-8,500
2035	-36.7	0.0	-36.7	-4,900	-8,500
2040	-41.4	0.0	-41.4	-5,000	-8,500
2043	-4.3	0.0	-4.3	-500	-800

Source: Table 26d of Appendix 6

Notes: Assumes constant market share (72.5%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 23; minimum floorspace requirement based on an assumed sales density of £6,000 per sq.m at 2025; maximum floorspace requirement based on an assumed sales density of £3,500 per sq.m at 2026; in 2024 Prices

7.18 The level of comparison goods floorspace capacity identified is considered to be limited. The capacity identified is likely to be absorbed in the short and longer term through the reoccupation of currently vacant floorspace, and therefore there is no requirement to allocate sites for the delivery of additional comparison floorspace.

Convenience and Comparison Qualitative Requirements

7.19 In examining the performance of specific stores, it is evident that Aldi and Lidl's discount supermarkets are performing particularly strongly and that the performance of food superstores²¹ is more variable.

7.20 In this regard it should be noted that, whilst household survey respondents have in the past perhaps been slightly reluctant to acknowledge that they undertake their main food shop at a discounter, this no longer appears to be the case. In addition, our methodology apportions convenience goods expenditure to foodstore destinations according to their identified market share. The methodology does not take into consideration that similar items are generally cheaper in Aldi and Lidl than in one of the 'big four' operators' stores. As such, the performance of discount operators is probably overstated and the performance of the 'big four' operators is probably understated.

²¹ Defined as having a net sales area of more than 2,500 sq.m.

- 7.21 The moderate performance of some existing food superstores is not particularly surprising, given that across the country shoppers are frequently foregoing the previously dominant ‘big four’ foodstore operators in favour of discounters.
- 7.22 As a consequence of this, we believe that it is highly unlikely that there will be any requirement in the foreseeable future for any further large food superstores in the area. This is consistent with the current strategy of the ‘big four’ who are currently very circumspect in terms of their appetite to bring forward additional large superstores.
- 7.23 Both Aldi and Lidl have substantially improved their share of the national grocery market in recent years. Notwithstanding this, the very strong performance of the Aldi and Lidl stores in particular, suggests that the market could support more discount foodstore provision. In this regard, we note that Lidl specifically have further requirements for new stores across Bradford, and therefore additional proposals for such development could come forward in the short term.
- 7.24 It is our view that any additional proposed food supermarkets should be considered on their merits in accordance with relevant policy tests. Most particularly, planning applications which seek to provide additional food retail provision should be considered having regard to potential sequential alternative sites, and with reference to the magnitude of impacts arising at any defined centre. The potential qualitative benefits associated with any improvement in customer choice can also be afforded weight in the decision-making process.
- 7.25 In terms of the spatial distribution of convenience goods facilities, we believe that existing large-scale main food shopping facilities are generally sited in a sustainable manner across the authority area and there are no obvious ‘gaps’ in terms of provision which need to be planned for.
- 7.26 Turning to the qualitative requirements of comparison retailing, it is clear that Bradford City Centre does and will continue to be the principal comparison destination across the Study Area. However, there is a clear dominance of the out of centre facilities, which will continue to have the potential to draw trade from the defined centres, and particularly those which provide for a more diverse comparison offer including selling clothing and footwear. Such facilities include Forster Square to the north of the city centre, and the out of centre provision particularly in Keighley including Alexandra Mills Retail Park and Keighley Retail Park.
- 7.27 As such, continuing to encourage comparison retailing into the defined centres and particularly the principal city and town centres will be key to encouraging footfall and expenditure and policies which seek to protect the defined centres from out of centre development are key to realising this.
- 7.28 It is our recommendation that the overarching policy approach should therefore be based upon the following key pillars which provides a positive strategy to the defined centres and whilst continuing to acknowledge that the new Local Plan intends to plan for meeting retail ‘needs’ alongside other main town centre land uses:
- New / replacement floorspace will naturally be encouraged by the Council’s positive planning strategy for existing defined centres and specifically around transport hubs and those areas of growth within the Southern Gateway Masterplan and Holme Wood where new population will create additional footfall.
 - Planned local centres, will be providing new retail floorspace to meet some of the identified ‘needs’. A key element of providing for retail needs, alongside other main town centre land uses, is via planned new centres.
 - New retail provision will also be provided through the development management process. It will remain the case that proposals for new retail floorspace / retail uses will come forward outside of the plan-led system

and, instead, be dealt with via the development management process. Whilst such proposals will face detailed scrutiny, they will, if permitted, go some way to meeting the needs of the retail sector and the local community.

8. Assessment of Leisure Capacity

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

Participation Rates

- 8.4 We begin by looking at the participation rates of each principal leisure activity across the 15 zones of the Study Area.
- 8.5 The household survey enables us to see which leisure activities residents of Bradford typically participate in and which are the most popular across the 15 zones. Table 8.1 below provides the participation rates on a zonal basis.

Table 8.1: Participation Rates by Zone

Leisure Activity	T'tal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Restaurant	51.02%	53.51%	63.45%	56.45%	37.43%	66.47%	66.86%	60.02%	65.36%	52.77%	35.68%	42.92%	35.38%	47.93%	45.87%	51.90%
Pub / bars / nightclubs / social club	37.83%	55.59%	51.13%	43.96%	36.04%	48.46%	32.78%	41.16%	42.90%	34.43%	24.12%	33.42%	19.18%	25.00%	32.72%	52.68%
Theatres / concert halls / museums / art galleries	33.08%	32.40%	37.09%	43.83%	16.42%	39.87%	43.83%	37.28%	39.51%	41.83%	17.62%	29.89%	12.40%	31.30%	49.03%	34.65%
Cinema	31.76%	26.08%	23.38%	42.59%	19.26%	39.51%	37.57%	35.42%	28.97%	27.77%	39.49%	27.76%	26.43%	31.02%	36.33%	36.67%
Indoor sports or health and fitness activity	21.10%	19.94%	31.84%	25.08%	11.34%	35.98%	13.05%	28.53%	11.08%	16.18%	15.92%	20.52%	19.22%	7.10%	22.03%	36.30%
Ten pin bowling	8.41%	0.75%	0.39%	5.69%	5.83%	9.07%	10.07%	4.96%	5.77%	8.82%	14.69%	15.19%	10.11%	9.64%	21.29%	2.56%
Other competitive social activities	6.64%	2.64%	0.79%	4.22%	4.45%	8.22%	6.17%	10.97%	8.37%	14.74%	6.53%	7.25%	1.24%	8.21%	11.87%	7.70%
Bingo	3.57%	0.75%	0.39%	0.00%	2.33%	0.00%	0.76%	4.66%	3.60%	7.16%	4.72%	12.14%	3.43%	0.62%	5.47%	2.30%
Casino	1.51%	0.37%	0.00%	3.58%	0.33%	1.33%	0.76%	3.16%	3.17%	2.15%	1.71%	0.35%	1.86%	0.62%	1.02%	2.81%

- 8.6 Table 8.1 is clear that the most popular leisure activity across all of the 15 zones is visiting restaurants, followed by ‘pubs/bars/nightclubs/social clubs’. In addition, visiting the cinema, theatres and other cultural venues are also popular leisure activities.

- 8.7 We can therefore see that providing facilities for a number of these leisure activities is important for the residents of Bradford, and therefore gaining an understanding of the future needs of the types of leisure uses is a valuable exercise.

Food and Beverage Requirements

Leisure Expenditure Growth

- 8.8 To calculate per capita food and beverage expenditure, we have again utilised Experian Micromarketer G3 data. The base year for this expenditure data is also 2024. Experian provides separate per capita expenditure estimates on a zonal basis for 'restaurant and café meals per person' and 'alcoholic drinks (away from home) per person'.
- 8.9 There is no need to make allowance for special forms of trading expenditure (given that all food and beverage expenditure identified by Experian relates to eating and drinking in bars, pubs, cafes, and restaurants).
- 8.10 ERPBN23 provides annual leisure expenditure growth forecasts which we set out at the below Table 8.2. These growth rates are used to estimate increases in per capita food and beverage expenditure across the plan period to 2042.

Table 8.2: Experian Retail Planner Briefing Note 23 Leisure Expenditure Annual Per Capita Growth Rates

Year	Leisure Per Capita Annual Growth
2023	0.7%
2024	0.8%
2027	0.6%
2028-32	1.1%
2033-40	1.0%

Source: Figure 1a of Appendix 3 of Experian Retail Planner Briefing Note 23 (March 2026)

- 8.11 We again recognise that growth in expenditure forecasts in the longer-term should be treated with caution given the difficulties in predicting economic performance over such an extensive timeframe.
- 8.12 Accepting this caveat, we are able to use Experian's recommendations in respect of annual expenditure growth to calculate expenditure across the food and beverage sectors at 2026, 2031, 2036, 2040 and 2043.

Restaurant and Café Floorspace Requirements

- 8.13 Based on the assumed Study Area resident population and the available per capita restaurant and café expenditure, we estimate that £427.2m of such expenditure originates within the Study Area at 2026.
- 8.14 The below Table 8.3 indicates that available Study Area restaurant and café expenditure is forecast to increase to £515.0m at 2043.

Table 8.3: Total Available Study Area Restaurant and Café Expenditure

2026 (£m)	2030 (£m)	2035 (£m)	2040 (£m)	2043 (£m)
427.2	452.2	479.1	507.2	515.0

Source: Table 2 of Appendix 6

Note: In 2024 prices

- 8.15 Table 8.4 indicates that this represents an increase of £87.8m (or 20.5%) across the Study Area between 2026 and 2046.

Table 8.4: Growth in Available Study Area Restaurant and Café Expenditure

Growth 2026-43 (£m)
87.8

Source: Table 2 of Appendix 7
Note: In 2024 prices

- 8.16 Our methodology accounts for the fact that existing operators will look to increase their turnover going forward to remain viable. On this basis, we identify an expenditure surplus of £17.8m at 2031. Due to subsequent expenditure and population increases, this surplus increases to £34.5m at 2036.
- 8.17 As with retail capacity, this monetary surplus can be converted into a floorspace requirement. The average sales density of UK floorspace was around £8,584 per sq.m at 2026.²²
- 8.18 Based on this sales density (and allowing for future increases in the sales efficiency of leisure floorspace going forward), we estimate that 2,100 sq.m of additional café and restaurant floorspace could be supported at 2031, increasing to 4,000 sq.m at 2036.

Table 8.5: Quantitative Capacity for Restaurant and Café Floorspace in the Authority Area

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Exp. With 5% Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq.m)
2026	314.7	299.0	314.7	0.0	0
2031	315.3	316.5	333.1	17.8	2,100
2036	318.5	335.3	353.0	34.5	4,000
2041	321.7	355.0	373.7	52.0	5,900
2043	321.1	360.4	379.4	58.3	6,600

Source: Table 5a and Table 5b of Appendix 7

Notes: Assumes constant market share (70.0%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 23 - Leisure; in 2024 prices

Licensed Premises Floorspace Requirements

- 8.19 Based on the assumed Study Area resident population and the available per capita alcoholic drinks expenditure, we estimate that £194.8m of alcoholic beverage expenditure originates within the Study Area at 2026.
- 8.20 The below Table 8.6 indicates that available Study Area restaurant and café expenditure is forecast to increase to £235.1m at 2043.

Table 8.6: Total Available Study Area Licensed Premises Expenditure

2026 (£m)	2031 (£m)	2036 (£m)	2041 (£m)	2043 (£m)
194.8	206.2	218.6	231.5	235.1

Source: Table 7 of Appendix 7
Note: In 2024 prices

²² As identified by Figure 2 of Experian Retail Planner Briefing Note 23 – Leisure.

- 8.21 Table 8.7 indicates that this represents an increase of £40.3m (or 20.7%) across the Study Area between 2026 and 2043.

Table 8.7: Growth in Available Study Area Licensed Premises Expenditure

Growth 2026-43 (£m)
40.3

Source: Table 7 of Appendix 7
Note: In 2024 prices

- 8.22 Our complete licensed premises quantitative assessment model is provided at Appendix 7 of this Study. Table 10 of Appendix 7 identifies that £151.1m (equating to 77.6%) of Study Area alcoholic drink expenditure is directed to licensed premises in the authority area at 2026. Our methodology accounts for the fact that existing operators will look to increase their turnover going forward to remain viable. On this basis, we identify an expenditure surplus of £9.0m at 2031. Due to subsequent expenditure and population increases, the identified surplus increases to £17.5m at 2036.
- 8.23 Once again, this monetary surplus can be converted into a floorspace requirement. Based on the average UK leisure sales density of £8,584 sq.m at 2024 (and allowing for future increases in the sales efficiency of leisure floorspace going forward), we estimate that 1,100 sq.m of additional licensed premises floorspace could be supported at 2031, increasing to 2,000 sq.m at 2036.

Table 8.8: Quantitative Capacity for Licensed Premises in the Authority Area

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Exp. With 5% Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq.m)
2026	159.1	151.1	159.1	0.0	0
2031	159.4	160.0	168.4	9.0	1,100
2036	161.0	169.6	178.5	17.5	2,000
2041	162.6	179.7	189.1	26.5	3,000
2043	162.3	182.4	192.0	29.7	3,400

Source: Table 10a and Table 10b of Appendix 7

Notes: Assumes constant market share (77.6%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 23 - Leisure; in 2024 prices

- 8.24 In terms of all food and beverage floorspace capacity identified above, we note that the Council's and other stakeholder's aspirations for the future regeneration of the principal centres within Bradford will include the provision of additional leisure floorspace. This is particularly the case within the Southern Gateway Masterplan area, which is seeking to deliver sustainable neighbourhoods.
- 8.25 This will not only provide for a more diverse offer for residents and visitors, but also help to encourage dwell time throughout the day and into the evening, particularly for centres which otherwise typically go very quiet at night. This in turn will also help to encourage town centre living and improve safety perceptions through the encouragement of activity.
- 8.26 We therefore recommend that town centre policies continue to encourage a diverse range of uses within the defined centres to include leisure uses, to help to attract footfall and expenditure and help to protect the future vitality and viability of these centres.

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

- 8.27 Our approach in identifying the potential for large format to the assessment of commercial leisure needs departs from the above monetary capacity assessment. This is because the commercial leisure sector is different to the retail and food and beverage sectors; large-scale leisure uses are relatively limited in number and customers often expect to travel at least some distance in order to access them. As such, we believe it is sensible to consider the general appropriateness of provision on a Study Area basis, with reference to the typical number of persons required to support particular uses.
- 8.28 Our assessment considers the typical population required to support bingo halls, casinos, cinema screens and ten pin bowling alleys, and is based around three key stages.
1. We firstly calculate the expected Study Area and local authority populations for the relevant reporting years.
 2. We then calculate the number of persons required to support a bingo hall, casino, cinema screen and bowling alley nationally, across the UK.
 3. We then apply the respective ratio to the Study Area population and to the population of the Bradford authority area to gauge the benchmark level of provision, based on the position evident across the UK.
- 8.29 We supplement our assessment with an overview of current patterns of commercial leisure trips throughout the Study Area (as identified by the NEMS household survey) to help identify any qualitative deficiencies in provision.
- 8.30 We recognise that some of these facilities are not as important as they perhaps once were in underpinning the local leisure economy. However, all four uses generally occupy large format premises and, as such, if a requirement were to be identified then there are potential land use implications.

Bingo

- 8.31 Gala (now Buzz Bingo) and Mecca are the main bingo operators, controlling over half of the UK market. Marketing of the bingo sector has been more proactive in recent years and Gala and Mecca have invested in premises, moving out of dated premises (i.e. converted cinemas) into purpose-built units. Bingo clubs have become increasingly sophisticated and have actively sought to attract all age groups. The bingo sector usually prefers central locations that are accessible by public transport and by foot. However, the significant increase in on-line gambling has, and will continue to affect this sector.
- 8.32 The Gambling Commission indicates the number of bingo premises fell by over 15% between 2014 to 2020, due in part to the increase in on-line bingo. The Gambling Commission latest figures indicates the UK currently has 582 bingo halls, equating to approximately one facility per 93,000 adults.
- 8.33 The below Table 8.9 confirms bingo hall capacity within Bradford over the period to 2043.

Table 8.9: Bingo Hall Capacity in the Authority Area

Year	Study Area Population	Typical Population Required to Support Hall	Percentage of Population in Bradford Authority Area	Potential Number of Halls Supported in the Authority Area	Existing Provision	Outstanding Potential Capacity in the Authority Area
2026	623,626	93,000	88.1%	5.9	1	4.9
2031	628,798	93,000	88.1%	6.0	1	5.0
2036	634,334	93,000	88.1%	6.0	1	5.0
2041	640,861	93,000	88.2%	6.1	1	5.1
2043	642,208	93,000	88.2%	6.1	1	5.1

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

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

8.35 The provision available in the authority area at the Buzz Bingo at Weaverthorpe Retail Park, alongside smaller independent facilities, provides for the population sufficiently and therefore we do not recommend that the Council plans for the growth of the sector in the local plan.

Cinemas

8.36 The UK Cinema Association website estimates that there are 4,637 cinema screens in the UK²³, which equates to one screen for every 14,801 persons or thereabouts.

8.37 As Table 8.10 indicates below, the provision within Bradford is slightly higher than the identified capacity. Residents therefore have good access to provision both within the district, and within neighbouring authority areas (which are not accounted for in the capacity assessment below). It is therefore considered that generally, trips to such cinemas considered to be generally reflective of sustainable travel patterns and many Study Area residents' relative proximity to existing cinemas.

8.38 In light of the existing provision within Bradford, we recommend that a flexible approach is applied in respect of future aspirations and that should it be that the commercial market indicates additional cinema screens could be viably accommodated, such a scheme should be explored further.

²³ At 2022.

Table 8.10: Cinema Screen Requirement in Authority Area

Year	Study Area Population	Typical Population Required to Support Cinema Screen	Percentage of Population in Bradford Authority Area	Potential Number of Cinema Screens Supported by Authority Area	Existing Provision (No. of Screens)	Outstanding Potential Capacity in the Authority Area
2026	623,626	14,984	88.1%	36.7	38	-1.3
2031	628,798	14,984	88.1%	37.0	38	-1.0
2036	634,334	14,984	88.1%	37.3	38	-0.7
2041	640,861	14,984	88.2%	37.7	38	-0.3
2043	642,208	14,984	88.2%	37.8	38	-0.2

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

Ten Pin Bowling

- 8.39 The national average for the provision of ten pin bowling lanes is one lane per 12,000 people.
- 8.40 As Table 8.11 below indicates, the authority area provides for two formal bowling facilities, at Hollywood Bowl in Bradford (28 lanes) and at Go Bowling in Shipley (12 lanes). On this basis, Bradford is very well provided for in terms of the number of tenpin bowling alleys.
- 8.41 Whilst very few new ten-pin bowling alleys were built in the early part of this century, the market has picked up in recent years. However, the upturn in the sector has been driven by smaller facilities which are generally supplemented by a strong food and beverage offer and are located within larger urban centres. We do not envisage that there will be a strong demand for additional facilities, but that there may be an opportunity to encourage a boutique-style facility within one of the principal town centres.

Table 8.11: Ten Pin Bowling Lane Requirement in the Authority Area

Year	Study Area Population	Typical Population Required to Support Bowling Lane	Percentage of Population in Bradford Authority Area	Potential Number of Bowling Lanes Supported by the Authority Area	Existing Provision (No. of Bowling Lanes)	Outstanding Potential Capacity in the Authority Area
2025	447,068	12,000	52.9%	19.7	36	-16.3
2030	454,779	12,000	52.9%	20.1	36	-15.9
2035	462,983	12,000	52.9%	20.4	36	-15.6
2040	471,896	12,000	52.9%	20.8	36	-15.2
2043	475,614	12,000	52.9%	21.0	36	-15.0

Note: Typical population to support ten pin bowling alley calculated with reference to the Mintel Ten Pin Bowling UK 2017 report and to the ONS 2023 population forecasts for the UK

Casinos

- 8.42 Mintel's Casinos and Bingo UK 2018 report identifies that there are 145 casinos across the UK, which equates to a casino for every 471,600 persons or thereabouts.
- 8.43 Accordingly, we estimate that the authority area could support around 0.2 casinos at 2026, a figure which would not change throughout the Study period. There is therefore no requirement for the Council to plan for a new facility within the new local plan.

Table 8.12: Casino Requirement in the Authority Area

Year	Study Area Population	Typical Population Required to Support a Casino	Percentage or Population in Bradford Authority Area	Potential Number of Casinos Supported by the Authority Area	Potential Number of Casinos Supported in the Authority Area	Outstanding Potential Capacity in the Authority Area
2026	623,626	469,063	88.1%	1.2	1	0.2
2031	628,798	469,063	88.1%	1.2	1	0.2
2036	634,334	469,063	88.1%	1.2	1	0.2
2041	640,861	469,063	88.2%	1.2	1	0.2
2043	642,208	469,063	88.2%	1.2	1	0.2

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

Health and Fitness Centres

- 8.44 Despite the current uncertainties associated with available household income, the most recent research shows that the UK health and fitness industry is stronger than it has ever been as measured by number of gyms, membership and market value. The State of the Fitness Industry Report 2024, produced by the Leisure Database Company, finds overall, the UK health and fitness industry is performing strongly, with data indicating that member numbers, market value and penetration all surpassing pre-pandemic levels and reaching all-time highs. The report identifies that as of 2024, the number of gym members increased to 10.7m from 10.3m in 2023.
- 8.45 Gyms and health and fitness facilities of course make an important contribution to the health of the local authority's population across the complete spectrum of ages. The range of operators and brands within the health and fitness sector are now relatively broad, with a number of budget brands topping the market in terms of number of clubs open and who have experienced the most significant growth in recent years. Indeed, Puregym was hoping to add an additional 60-70 gyms to their portfolio by the end of 2025²⁴.
- 8.46 Looking across the authority area, there appears to be a good choice of health and fitness facilities, with a number of national multiples, independents and community run gyms and fitness facilities.
- 8.47 The Table 8.13 below provides the details of the top health and fitness facilities within the authority area.

Table 8.13: Health and Fitness Clubs by Zone (Over 3% of Responses)

Leisure Activity	T'tal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Sedbergh Sports and Leisure Centre	6.91%	0.00%	0.00%	0.00%	0.00%	6.73%	16.26%	8.86%	31.16%	5.71%	1.63%	27.61%	7.77%	5.82%	13.95%	0.00%
Nuffield Health Gym, Fred Atkinson Way, Shipley	5.64%	0.00%	0.00%	1.36%	16.30%	0.00%	31.01%	0.00%	28.62%	0.00%	0.00%	0.00%	0.00%	5.82%	19.46%	8.37%
Bradford City Centre	5.45%	0.00%	0.00%	0.00%	0.00%	0.00%	8.73%	16.17%	32.48%	0.00%	18.23%	0.00%	0.00%	0.00%	25.34%	4.98%
Pure Gym, Alston Retail Park, Keighley	4.15%	17.86%	0.00%	12.39%	26.43%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	16.42%	0.00%	0.00%	0.00%	0.00%
The Leisure Centre, Hard Ings Road, Victoria Park View, Keighley, BD21 3JN	3.83%	25.76%	11.61%	0.00%	48.54%	2.65%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
JD Gyms, Manningham Lane	3.64%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	9.11%	0.00%	20.56%	0.00%	0.00%	8.45%

²⁴ <https://www.puregym.com/blog/uk-fitness-report-gym-statistics/>

Leisure Activity	T'tal	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Retail Park, Bradford, BD1 3AH																
Shipley Town Centre	3.47%	0.00%	0.00%	0.00%	0.00%	0.00%	29.48%	1.46%	0.00%	0.00%	0.00%	0.00%	1.39%	38.36%	1.54%	4.23%
Nuffield Health Gym, Otley Road, White Cross, Guiseley, Leeds, LS20 8LY	3.44%	0.00%	9.11%	7.64%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	11.08%
Nuffield Health Gym, Cottingley New Road, Cottingley, Bingley, BD16 1TZ	3.21%	3.20%	0.00%	2.73%	0.00%	21.42%	5.81%	7.40%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%

8.48 In terms of capacity, the results of the household survey indicate that a total of 21.1% of the population regularly participate in indoor sports or health fitness activities. The results also indicate that facilities within the authority area retain approximately 73.0% of trips.

8.49 The authority area population is estimated to increase by 18,582 people by 2042. Assuming that a similar gym/health club participation level would apply to the new population as has been identified for the Study Area (i.e. 21.1%) this would equate 3,921 potential new gym members over the plan period. Based on average membership levels for major gym operators (2,897 members) and budget gym operators (3,452 members), the anticipated uplift in the population in the authority over the period to 2042 could potentially support one additional gym.

8.50 Bringing forward new gym and health and fitness facilities will be dependent on market demand from operators seeking space in local authority areas. Proposals for new health and fitness facilities should be directed to defined centres in the first instance, in accordance with national policy. We do not however recommend the allocation of specific sites for such uses within the local plan, and that demand will very much be market-led.

Other Commercial Leisure

8.51 There has been a growth in recent years in other more specialist commercial leisure attractions, including facilities such as trampoline parks, indoor soft play centres, ninja courses and a range of competitive social destinations. The latter is a fast-paced sector and is still continuing to grow, with new formats becoming present in the market. Such uses include urban golf, bar and game formats, which include games such as axe-throwing, shuffleboard, table tennis and so on, virtual reality gaming and escape rooms. All of these commercial leisure uses fall within the defined town centre use bracket, and typically require large floorplates.

8.52 Calculating a quantitative need for such uses is not possible, particularly given the evolving market and relative infancy of such uses. However, we are able to review the existing offer and consider whether there may be a qualitative requirement to increase the offer across the authority area.

8.53 Overall, the wider commercial leisure offer in the Bradford authority area is mixed, with some provision within and surrounding the city centre in particular, including escape rooms, VR Experiences, axe throwing and facilities targeted more on the younger generation such as inflatable and trampoline parks. Instead, residents will be looking to surrounding higher-order centres, particularly Leeds City Centre to meet their commercial leisure needs in this context.

8.54 Although the market for such commercial leisure uses is still evolving, and alternative operators may still continue to require new premises across the authority area, these should be assessed on a case-by-case basis, ensuring

that such uses are directed towards defined centres in the first instance. This is particularly important given the wider benefits such uses can have in terms of encouraging longer dwell-times and increasing footfall and associated expenditure within centres.

- 8.55 However, it is noted that opportunities for larger format leisure uses within the defined centres in the Bradford authority area will be limited due to the average size of the units being small scale and there being limited opportunity to expand the offer in the centres.
- 8.56 The Town Centres Practice Guidance states at paragraph 012 that the use of the sequential test should recognise that certain town centre uses have particular market and locational requirements, which meant that they may only be accommodated in specific locations. It goes on to state that robust justification will be needed where this is the case. Whilst the guidance does not circumnavigate the need for a robust assessment, it does provide scope for proposals to be situated in alternative non-town centre locations should there be no sequentially preferable locations in centre.

9. Summary, Conclusions and Policy Recommendations

Context

- 9.1 The principal purpose of the Study is to understand future retail and leisure needs, and to provide policy recommendations to assist the Council in its preparation of the forthcoming Local Plan.
- 9.2 The Local Plan will set out the Council's strategy in respect of delivering new future growth in respect of a range of new developments, including housing, jobs, and main town centre uses. To ensure that commercial uses are delivered in sustainable locations, the Local Plan will provide up to date policies in respect of town centre boundaries, the hierarchy of defined centres, and local impact thresholds of relevance to retail and leisure developments.
- 9.3 This concluding section of our report summarises the key findings of the Study and addresses planning policy requirements of relevance to retail, leisure, and town centres.
- 9.4 The emerging planning policy framework for Bradford places town and city centres at the heart of the district's long-term strategy for sustainable growth, regeneration and placemaking. Rather than seeking to restore historic patterns of retail development, the emerging approach recognises that centres must evolve into more diverse, mixed-use destinations that support retail alongside housing, employment, leisure, culture, public services and community uses. This reflects national planning policy and acknowledges the structural changes affecting retailing, including changing consumer behaviour, growth in online shopping and evolving occupier requirements. Overall, we are supportive of this approach and consider it a robust and justifiable methodology.
- 9.5 A key theme of the emerging Local Plan is the continued role of Bradford city centre as the district's principal centre, accommodating the highest concentration of retail, leisure, commercial, cultural and civic functions. The policy framework seeks to maintain the city's primary retail role whilst supporting significant diversification through residential development, office space, hospitality, leisure and cultural investment. This is reinforced through the Bradford Regeneration and Growth Plan, which identifies City Village, the Southern Gateway, Bradford Live, Darley Street Market, a new city centre rail station and mass transit as transformational projects that will reshape the city centre over the next decade.
- 9.6 The emerging strategy also reinforces the district's settlement hierarchy, recognising the complementary roles of Keighley, Shipley, Ilkley, Bingley and other town centres in meeting the day-to-day retail, leisure and service needs of their catchments. Future investment is expected to strengthen these centres through heritage-led regeneration, improvements to public realm, active travel, residential development and enhanced local services, rather than significant expansion of traditional comparison retail floorspace. Recognition that the smaller centres in the hierarchy play different, yet still important roles in meeting residents' needs, will be an important thread running through the local plan policies. Whilst the city centre remains the principal centre in Bradford, this does not detract from the importance of the smaller centres.
- 9.7 We comment further below in respect of the appropriate hierarchy for the district and where we have made some small recommended adjustments to the lower tiers in the hierarchy in particular.

Key Findings: Retail

Quantitative and Qualitative Capacity

- 9.8 As identified at Section 7, we do identify a surplus quantitative capacity to support additional convenience goods floorspace across the authority area across the plan period. However, we do not identify any capacity for additional comparison goods floorspace.
- 9.9 The capacity findings are based on an assumption that the market share attracted to existing facilities within the authority area remains consistent across the plan period.

Table 9.2: Quantitative Capacity for Convenience Goods and Comparison Goods Floorspace in the Bradford Authority Area – Based on Experian Population Forecasts

Year	Convenience Goods Floorspace Requirement		Comparison Goods Floorspace Requirement	
	Minimum (sq.m)	Maximum (sq.m)	Minimum (sq.m)	Maximum (sq.m)
2026	11,900	14,200	0	0
2031	10,100	12,100	-5,000	-8,500
2036	9,700	11,700	-4,900	-8,500
2041	9,800	11,700	-5,000	-8,500
2043	9,800	11,700	-500	-800

Source: Table 6d and 26d of Appendix 6
Note: In 2024 prices

- 9.10 We also provide below the retail capacity findings which reflect the planned housing growth across the plan period, as assessed under the second scenario.
- 9.11 Table 9.3 demonstrates that based on the population growth derived from the planned housing growth, the capacity for both convenience and comparison goods floorspace across the authority area increases considerably. This is particularly evident in respect of comparison goods floorspace, where the findings from the Experian-led projections do not identify any capacity, whereas the housing-led projections do identify a capacity of up to 20,200 sq.m by 2043.
- 9.12 As set out above, these longer-term projections should be treated with caution given the inherent uncertainties associated with the commercial market. However, the figures do indicate the potential floorspace needs associated with housing growth across the authority area.

Table 9.3: Quantitative Capacity for Convenience Goods and Comparison Goods Floorspace in the Bradford Authority Area – Based on Housing Growth Population Forecasts

Year	Convenience Goods Floorspace Requirement		Comparison Goods Floorspace Requirement	
	Minimum (sq.m)	Maximum (sq.m)	Minimum (sq.m)	Maximum (sq.m)
2026	11,900	14,200	0	0
2031	11,700	14,000	-1,600	-2,800
2036	13,800	16,600	3,600	6,200
2041	15,900	19,100	7,900	13,600
2043	15,700	18,800	11,800	20,200

Source: Table 6d and 26d of Appendix 6

- 9.13 In practice, the level of capacity identified in the medium term in particular, could be absorbed within the proposed developments allocated within the local plan, along with the reoccupation of existing floorspace within defined centres.
- 9.14 Whilst the capacity figures associated with the housing-led growth in particular indicate a 'need' for additional floorspace across the authority area, we do not recommend that specific floorspaces are provided for within allocations and that instead, local facilities are encouraged to support residential growth areas across the authority area and local plan period.
- 9.15 Turning firstly to convenience capacity, in practice, grocery retailers are continually reviewing their requirements and it is anticipated that there will be some activity in respect of the submission of planning application proposals for additional convenience goods floorspace. Furthermore, as residential developments progress, additional interest will be forthcoming as the market evolves.
- 9.16 In examining the performance of specific stores, it is evident that Aldi and Lidl's discount supermarkets are performing particularly strongly and that the performance of food superstores²⁵ is more variable.
- 9.17 In this regard it should be noted that, whilst household survey respondents have in the past perhaps been slightly reluctant to acknowledge that they undertake their main food shop at a discounter, this no longer appears to be the case. In addition, our methodology apportions convenience goods expenditure to foodstore destinations according to their identified market share. The methodology does not take into consideration that similar items are generally cheaper in Aldi and Lidl than in one of the 'big four' operators' stores. As such, the performance of discount operators is probably overstated and the performance of the 'big four' operators is probably understated.
- 9.18 The moderate performance of some existing food superstores is not particularly surprising, given that across the country shoppers are frequently foregoing the previously dominant 'big four' foodstore operators in favour of discounters.
- 9.19 As a consequence of this, we believe that it is highly unlikely that there will be any requirement in the foreseeable future for any further large food superstores in the area. This is consistent with the current strategy of the 'big four' who are currently very circumspect in terms of their appetite to bring forward additional large superstores.
- 9.20 Both Aldi and Lidl have substantially improved their share of the national grocery market in recent years. Notwithstanding this, the very strong performance of the Aldi and Lidl stores in particular, suggests that the market could support more discount foodstore provision. In this regard, we note that Lidl specifically have further requirements for new stores across Bradford, and therefore additional proposals for such development could come forward in the short term.
- 9.21 It is our view that any additional proposed food supermarkets should be considered on their merits in accordance with relevant policy tests. Most particularly, planning applications which seek to provide additional food retail provision should be considered having regard to potential sequential alternative sites, and with reference to the magnitude of impacts arising at any defined centre. The potential qualitative benefits associated with any improvement in customer choice can also be afforded weight in the decision-making process.

²⁵ Defined as having a net sales area of more than 2,500 sq.m.

- 9.22 In terms of the spatial distribution of convenience goods facilities, we believe that existing large-scale main food shopping facilities are generally sited in a sustainable manner across the authority area and there are no obvious 'gaps' in terms of provision which need to be planned for.
- 9.23 Based on the housing-led growth projections, it is clear that future residential development is not evenly distributed across the district and that some areas will be transformed by future housing growth, focusing on the city area and principal town centres. Where sites are being developed for residential-led regeneration, it is recommended that the Council liaises with applicants to fully understand local needs and to gauge both the retail expenditure generated by new communities and whether this can be served in a sustainable manner by existing centres and standalone stores.
- 9.24 In practice, significant residential development should be served by local retail and service provision which is walkable. This will usually take the form of convenience store format retailing (catering for top-up grocery retail needs) supported by small scale service provision and/or community uses.
- 9.25 Turning to the qualitative requirements of comparison retailing, it is clear that Bradford City Centre does and will continue to be the principal comparison destination across the Study Area. However, there is a clear dominance of the out of centre facilities, which will continue to have the potential to draw trade from the defined centres, and particularly those which provide for a more diverse comparison offer including selling clothing and footwear. Such facilities include Forster Square to the north of the city centre, and the out of centre provision particularly in Keighley including Alexandra Mills Retail Park and Keighley Retail Park.
- 9.26 As such, continuing to encourage comparison retailing into the defined centres and particularly the principal city and town centres will be key to encouraging footfall and expenditure and policies which seek to protect the defined centres from out of centre development are key to realising this.
- 9.27 In light of the above, we recommend that any further retail development is comprised of two general forms, instead of the allocation of floorspace thresholds within the local plan. These forms are:
1. New / replacement floorspace will naturally be encouraged by the Council's positive planning strategy for existing defined centres. Even without specific site / area allocations, the new Local Plan is able to provide for a positive policy environment to provide new retail land uses within defined centres. Occupiers currently benefit from significant choice in most centres and it will be important to ensure that principal centres retain a critical mass of retail uses to provide an attractive and compelling offer which provides for some choice.
 2. Planned residential growth will be providing new retail floorspace to meet some of the identified 'needs'. A key element of providing for retail needs, alongside other main town centre land uses, is via planned new centres. We anticipate that the focus of any such development will be convenience retail (likely to be provided in a 'c-store' format with a maximum net sales area of 280 sq.m to accord with Sunday trading regulations) potentially supplemented with a very limited number of additional commercial units (which could be occupied by small scale retailers or service providers). The principal focus should be on meeting needs which principally arise from new development, albeit developers will also likely consider whether the existing residential population could also access the provision in a sustainable manner.
 3. New retail provision will also be provided through the development management process. It will remain the case that proposals for new retail floorspace / retail uses will come forward outside of the plan-led system and, instead, be dealt with via the development management process. Whilst such proposals will face detailed scrutiny, they will, if permitted, go some way to meeting the needs of the retail sector and the local community.

Key Findings: Commercial Leisure

- 9.28 Our assessment of future leisure needs is in two parts.
- 9.29 In terms of food and beverage floorspace, we have undertaken a quantitative assessment which identifies available expenditure and takes account of the need for existing businesses to increase their turnover to remain viable.
- 9.30 Our assessment has identified that at 2036 there is a requirement for 4,000 sq.m of restaurant and café floorspace and for 2,000 sq.m of licensed premises floorspace (this equating to a total of 6,000 sq.m of food and beverage floorspace).
- 9.31 We anticipate that this floorspace will comprise of relatively small-scale cafés, restaurants and bars which would generally be accommodated within the principal centres and which will likely come forward as part of the town centre regeneration initiatives coming forward.

Table 9.4: Quantitative Capacity for Restaurant and Café Floorspace and Licensed Premises Floorspace in the Authority Area – Experian-led Growth

Year	Restaurant and Café Floorspace Requirement (sq.m)	Licensed Premises Floorspace Requirement (sq.m)	Total Food and Beverage Floorspace Requirement (sq.m)
2026	0	0	0
2031	2,100	1,100	3,200
2036	4,000	2,000	6,000
2041	5,900	3,000	8,900
2043	6,500	3,300	9,800

Source: Tables 5a, 5b, 10a and 10b of Appendix 7

Note: Assumes constant market share of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 23 - Leisure; in 2024 prices

- 9.32 Again, we provide below the food and beverage floorspace capacity figures associated with the housing-led growth population forecasts.

Table 9.5: Quantitative Capacity for Restaurant and Café Floorspace and Licensed Premises Floorspace in the Authority Area – Housing-led Growth

Year	Restaurant and Café Floorspace Requirement (sq.m)	Licensed Premises Floorspace Requirement (sq.m)	Total Food and Beverage Floorspace Requirement (sq.m)
2026	0	0	0
2031	2,700	1,400	4,100
2036	5,700	2,900	8,600
2041	8,700	4,500	13,200
2043	9,300	4,800	14,100

Source: Tables 5a, 5b, 10a and 10b of Appendix 7

- 9.33 In terms of all food and beverage floorspace capacity identified above, we note that the Council's and other stakeholder's aspirations for the future regeneration of the Southern Gateway include the provision of additional commercial floorspace. The emerging vision for Southern Gateway is centred on delivering new homes, employment space, public realm and transport connectivity, alongside diverse retail and leisure uses which will predominantly serve the needs of the new residents. Leisure provision should therefore be integrated throughout the masterplan rather than concentrated in a single destination, helping to create active streets, support footfall beyond traditional working hours, and contribute to a safe and attractive urban environment.
- 9.34 The scale and type of leisure floorspace should be informed by future population growth and employment growth, dependent on the scale of development brought forward, along with the specific needs of surrounding communities. Active ground-floor leisure uses should be encouraged along key pedestrian routes, around public spaces and close to the proposed transport hub to maximise vitality and support sustainable travel patterns. This would help deliver a balanced and resilient mixed-use district that supports both daytime and evening economies while enhancing the quality of life.
- 9.35 We therefore recommend that town centre policies continue to encourage a diverse range of uses within the defined centres to include leisure uses, to help to attract footfall and expenditure and help to protect the future vitality and viability of these centres, alongside the wider policy aspirations to help regenerate the Southern Gateway Masterplan area. We cover this in more detail below.
- 9.36 The Study has identified quantitative capacity which equates to a requirement across the authority area at 2043 for:
- 5.1 bingo halls;
 - -0.2 cinema screen;
 - 7.2 ten pin bowling lanes;
 - 0.2 casinos; and
 - 1 new health and fitness club.
- 9.37 The ten pin bowling requirements are of a modest scale and we do not recommend that the Council specifically plans to increase the provision. Instead, should the opportunity arise, proposals for such facilities should be considered on their own merits against the key leisure policy tests.
- 9.38 Other than the above, we do not anticipate there to be operator demand to bring forward larger format leisure uses in the authority area over the plan period to 2043.
- 9.39 From a planning policy perspective, the key to meeting future needs is the formulation of policies that can accommodate changing needs and provide appropriate flexibility in the real world. This includes recognising that for many larger format commercial leisure uses the cost for entering a new market will be relatively high and, unlike retail outlets where store size can vary significantly, incremental development is unlikely if only small increases in market growth are identified. It is also the case that the recent changes to the Use Classes Order mean that the principal commercial leisure sector (in terms of expenditure) is food & beverage which encompasses both Class E and sui generis uses. Given the small to moderate scale of most operator requirements, changing demand for café and restaurant uses can generally be met through the reoccupation and reuse of existing city and town centre floorspace.

Future Retail and Centres Strategy

- 9.40 The provision of main food shopping destinations within and around defined centres within Bradford is a key strength of centres across the authority area and the benefit of retaining this should be given substantial weight when considering future convenience goods retail proposals. Indeed, there are instances where larger format convenience destinations provide key ‘anchors’ to centres, thereby drawing in residents and helping to support the wider businesses in the centres.
- 9.41 The centres are also supported by a range of leisure, service and financial businesses which provide a diverse offer for the residents of the authority area. Bradford is characterised by a highly diverse population, which significantly contributes to a distinctive retail and leisure offer across the district’s centres, supporting specialist food retailing, independent businesses, cultural venues, restaurants and community services that attract customers from both local neighbourhoods and a wider catchment area. The strength of Bradford’s independent business sector helps to differentiate many centres from competing destinations and creates opportunities for niche and culturally specific offers that are less vulnerable to direct competition from online retailing.
- 9.42 In terms of service sectors, financial and business transactions have increasingly moved online and ‘bricks and mortar’ financial service provision has significantly reduced as a consequence. This trend will not be reversed. It will be important to ensure that premises previously put to such use are repurposed and brought back into active use. By way of example, former bank and building society premises can often be made into attractive bars and restaurants which are able to enhance a centre’s wider offer (including the evening economy).
- 9.43 Whilst the economic picture is currently challenging for hospitality operators, we consider that further potential exists to expand the leisure sector offer within the authority’s principal centres across the medium to longer term. This ties in with the current aspirations to diversify the defined centres within the authority area, and the Masterplan schemes which further encourage this.
- 9.44 It is highly unlikely that there will be substantial comparison goods retail development coming forward within the local authority area across the plan period. In practice, some such in-centre retailers may close and consolidation of existing floorspace is likely to happen over the short, medium and longer term. This could open up town centre space for convenience retailers, and for the growth of the leisure and retail service sectors. Wider residential development opportunities are also likely to follow, helping to regenerate key brownfield sites and bring footfall into the centres to support the businesses further.
- 9.45 Food and drink operators are a critical component of a modern town centre, and the future success of these operators is inextricably linked to the centres’ overall vitality. Improved local leisure provision will mean a reduced need to travel further afield to eat, drink and socialise. This reduces carbon emissions and accords with sustainable development principles (particularly as a rounded retail and service offer should encourage linked trips and reduce travel). Again, this can be delivered in part through the appropriate delivery of floorspace as part the wider Southern Gateway Masterplan aspirations.
- 9.46 It is to be recognised that the capacity forecasts do not take account of current (or future) vacant retail floorspace. Some of this vacant space (particularly in prime shopping streets) will be available and suitable for reoccupation, repurposing and/or redevelopment both now and in the future. We therefore advise that any market demand for new retail and commercial leisure floorspace should be directed in the first instance to vacant units or to sites that can be assembled through the redevelopment of underutilised and vacant land and premises within centres.

Implications of a Growing City Centre Population

- 9.47 Introducing more than 6,000 new homes through City Village and Southern Gateway will fundamentally change the profile of demand within Bradford City Centre.
- 9.48 Unlike traditional retail-led regeneration, a resident population generates demand throughout the day and evening and supports a much broader range of services. Evidence from comparable city centre regeneration schemes suggests increased demand for:
- convenience food retail and smaller supermarkets;
 - cafés, bakeries, restaurants and independent food businesses;
 - health and wellbeing facilities, including gyms, pharmacies and healthcare services;
 - childcare, education and community facilities;
 - flexible workspace and local business services;
 - cultural venues and evening economy uses; and
 - high-quality public spaces capable of supporting everyday social interaction.
- 9.49 This represents a different pattern of expenditure from that generated by comparison shopping trips. Residents typically make frequent, local convenience purchases and use hospitality and leisure facilities on a regular basis, helping create a more stable year-round trading environment. Consequently, future commercial demand is expected to become increasingly dispersed across residential neighbourhoods and key pedestrian routes rather than being concentrated solely within the traditional shopping core.
- 9.50 The increased residential population should also strengthen Bradford's evening economy by providing a larger local customer base outside conventional shopping hours. This supports the continued diversification of food and beverage, cultural, entertainment and leisure uses identified elsewhere within this study as the sectors with the strongest long-term growth prospects.

Planning Policy Recommendations

General Policy Approach

- 9.51 Paragraph 018 of the Town Centres PPG indicates that proposals for edge and out-of-centre retail and leisure developments should be considered with reference to the health of centres that would be impacted by development.
- 9.52 Paragraph 018 of the Town Centres PPG states that:
- 'A judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. For example, in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.'**
- 9.53 In this context, it will be important for the emerging plan to clearly set out the importance of the sequential and impact tests and explain the local circumstances which frame how they will be applied in practice. The sequential and impact tests will need to be applied in a robust manner in order to provide for the re-use of vacant units and to support centres which retain a strong retail function as well as a diverse range of other uses. Whilst non-retail uses will be an important component of the mix of land uses in principal centres moving forward, there is still a requirement to accommodate new retailers and secure additional retail floorspace within defined centres wherever possible in accordance with the requirements of the NPPF.

- 9.54 It will be important for the forthcoming plan to clearly identify that Bradford city centre and the principal town centres should remain a focus for both convenience and comparison goods retail and that such uses remain important in driving footfall. It is important that this offer is maintained given local residents' needs. Such protection over the existing and proposed defined centres can be achieved through the appropriate application of the sequential and impact policy tests.
- 9.55 Notwithstanding this, as is demonstrated at Section 2, it is evident that fundamental changes in the retail sector – largely resulting from the shift to online retail, which has been accelerated by the Covid-19 pandemic – have had a permanent impact on land use on the high street. As such it is critical that defined centres continue to diversify in order to provide access to jobs, leisure, culture, services, and social connection.
- 9.56 In the context of the current offer of defined centres, and national planning policy requirements, we recommend that emerging plan policies are sufficiently flexible so as to allow for an appropriate range of town centre uses beyond retail, and reflect the need to repurpose historic, sometimes outdated retail stock in order to accommodate new residential, leisure and community uses.
- 9.57 The emerging plan should also consider the effects of the expanded Use Class E and the consequences of the additional flexibility which Class E provides for outside of town centres. The authority may wish to consider applying restrictive conditions to planning permission for Class E development which is delivered outside of town centres to restrict the authorised use to that which has been justified in the application submission. This will help ensure that unacceptable impacts do not arise within town centre as a consequence of future Class E development.

Bradford City Centre Policy Approach

- 9.58 The Southern Gateway seeks to transform a largely industrial, low-density area south of the city centre into a vibrant, mixed-use district with thousands of new homes, additional, high quality employment space, significant public realm improvements and new green infrastructure, a new civic heart for the city and improved transport connections centred around a proposed new Bradford Interchange rail station and future Mass Transit system.
- 9.59 The phasing runs from 2026 through to 2070, in four broad phases. In order to strengthen pedestrian connectivity across the site, footways along vehicular routes are proposed to enhance the walking network. In contrast, the Southern Gateway currently offers a limited pedestrian and cycling network, reflecting the low demand generated by a very small residential population. Improving connectivity between the city centre and surrounding communities. Promoting active travel, public transport, and reduced car dependency. Creating high-quality public spaces and green corridors. Supporting innovation, advanced manufacturing, culture, education, and health sectors. Enhancing Bradford's identity as a City of Culture and regional economic hub.
- 9.60 Key to the future success of the Southern Gateway will be the appropriate provision of retail and leisure uses to meet the needs of residents. Creating sustainable communities, where residents are able to access day-to-day amenities within easy walking distances of their homes is integral. However, planning for the future retail and leisure floorspace within the Masterplan area will need to be on an appropriate basis so as to not impact on the existing defined centres within the authority area, and in particular, Bradford city centre.
- 9.61 On this basis, the provision of retail and leisure floorspace should support place-making objectives, enhance vitality and viability, and contribute to a mixed-use urban environment without undermining Bradford city centre's role as the principal retail and leisure destination for residents. Therefore, the strategic policy approach should focus around the following key pillars:

- Support Bradford City Centre as the primary retail, cultural, and leisure destination;
- Deliver complementary rather than competing retail provision;
- Encourage a diversified evening economy;
- Promote sustainable travel patterns and walkable neighbourhoods;
- Support regeneration, employment growth, and increased residential development; and
- Enhance the attractiveness of the Southern Gateway as a destination for residents, workers, students, and visitors.

9.62 The retail function of the Southern Gateway should principally focus on meeting the needs of the growing residential and employment population expected to be accommodated within the immediate area only, not seek to draw in extensive trade from elsewhere. The latter would risk competing directly with Bradford city centre. Retail provision should therefore comprise a range of convenience shopping, local services, and small-scale commercial units that contribute to the creation of active and attractive streets. This provision would go some way to absorbing the identified convenience and leisure floorspace capacity as identified above, and the commercial leisure (food and beverage) floorspace.

9.63 New retail development should be integrated within mixed-use schemes and concentrated at ground-floor level along principal pedestrian routes, public spaces, and transport corridors. This approach will help to generate footfall, improve perceptions of safety, and create a vibrant urban environment.

9.64 The emphasis should be placed on smaller and medium-sized units capable of accommodating independent retailers, cafés, food outlets, and local service providers. Such uses are likely to support the area's emerging residential community while also serving employees and visitors. As such, sufficient control over unit sizes, maximum floorspace provision and phasing of commercial floorspace will be required.

9.65 Large-scale convenience and comparison retail development should generally be resisted within the Southern Gateway. Such development could undermine investment and activity within Bradford city centre and the Primary Shopping Area in particular, and would not align with the area's intended role within the wider retail hierarchy. Any proposals for significant comparison retail floorspace outside of the defined centre should be required to demonstrate compliance with national and local planning policy, including sequential and impact assessments, and provide clear evidence that there would be no adverse effects on the vitality and viability of existing centres.

9.66 Leisure uses will form a central component of the Southern Gateway's regeneration strategy and have the potential to significantly enhance the attractiveness and vitality of the area. The provision of a diverse range of leisure facilities will support economic growth, increase visitor numbers, and contribute to a stronger evening economy. Such development should be carefully designed and managed to ensure compatibility with nearby residential uses and to minimise potential impacts associated with noise, servicing, and late-night activity.

9.67 Planning policy should therefore seek to:

- Maintain and reinforce the city's primary retail core, directing comparison retail and national multiple operators towards the strongest shopping frontages where retail critical mass remains important. This will principally comprise the Primary Shopping Area and proximate areas.
- Support residential-led regeneration within peripheral retail areas, recognising that new housing will strengthen the long-term vitality and resilience of the wider city centre, encourage footfall and expenditure throughout and extend activity throughout the daytime and evening.

- Promote active ground floors along key pedestrian routes connecting Broadway, Darley Street Market, Bradford Live, City Village and Southern Gateway, ensuring that residential development continues to support vibrant street-level activity.
- Encourage flexible Class E accommodation capable of adapting over time between retail, cafés, health services, workspace and other commercial uses as market requirements evolve.
- Prioritise food, beverage, leisure and cultural uses within locations where increased residential populations are expected to generate regular demand throughout the day and evening.
- Invest in high-quality public realm and active travel connections that integrate existing commercial areas with City Village and Southern Gateway, ensuring that footfall generated by new neighbourhoods benefits the wider city centre rather than creating isolated development enclaves.
- Monitor changing retail demand through regular healthchecks and occupancy surveys so that planning policy can respond proactively to future market shifts rather than seeking to retain obsolete retail floorspace (see recommendations on monitoring later in this Section).

9.68 The city centre will become larger, more residential and more mixed-use, with activity distributed across several interconnected neighbourhoods rather than concentrated solely within the historic shopping core. This evolution is consistent with national trends affecting successful city centres and provides an opportunity for Bradford to create a resilient, adaptable and multi-functional centre where retail remains important but is complemented by housing, employment, leisure, culture and community uses. By planning positively for this changing geography, Bradford can secure a city centre that is better able to respond to future market shifts while supporting sustainable economic growth and improving the everyday experience of residents, workers and visitors alike.

9.69 The long-term success of the city centre will depend not only on the evolution of its retail and leisure offer, but also on the transformational infrastructure and transport investments that are planned over the coming decade. Collectively, the proposed new city centre rail station, the Southern Gateway regeneration programme and the West Yorkshire Mass Transit system have the potential to fundamentally reshape patterns of accessibility, movement, investment and commercial activity across the city. Rather than viewing these projects in isolation, they should be recognised as complementary interventions that will significantly enhance Bradford's attractiveness as a regional destination and expand the city's economic catchment.

9.70 The proposed new city centre rail station represents a particularly significant catalyst for change. By improving connectivity with Leeds, Manchester and the wider North, the station is expected to increase visitor numbers, support business investment and improve Bradford's competitiveness as a location for employment, education, tourism and city centre living. Experience elsewhere demonstrates that high-quality rail infrastructure can stimulate private sector investment, increase footfall and encourage higher density mixed-use development around transport hubs. For Bradford, the station also provides the opportunity to strengthen links between the traditional commercial core and emerging regeneration areas, extending activity beyond existing retail frontages.

9.71 The proposed West Yorkshire Mass Transit system has the potential to significantly improve accessibility to Bradford city centre from across the wider city region. Improved public transport connectivity will reduce journey times, widen labour market catchments and make the city centre more accessible for shoppers, visitors, employees and residents. Enhanced connectivity is particularly important in supporting the evening economy, cultural attractions and leisure destinations, where convenient and reliable public transport can influence travel behaviour and increase visitor dwell times.

9.72 Increased accessibility, higher residential populations, improved investor confidence and enhanced public realm are all likely to stimulate demand for retail, food and beverage, leisure, cultural and commercial uses. The emerging pattern of demand is therefore expected to be characterised less by additional comparison retail floorspace and

more by growth in convenience retail, independent food and drink businesses, hospitality, health and wellbeing services, flexible workspace and experience-led leisure uses that benefit from higher levels of daily footfall and a growing resident population.

- 9.73 Future planning policy should proactively respond to the opportunities created by these transformational infrastructure investments by supporting a flexible, mixed-use city centre capable of accommodating changing commercial requirements over time. This includes concentrating retail within the strongest commercial locations whilst encouraging active ground floor uses, residential development, cultural attractions and leisure investment along the key movement corridors that will connect the city centre with City Village, Southern Gateway, the new rail station and future Mass Transit stops.
- 9.74 In doing so, Bradford will be well positioned to maximise the economic benefits arising from these once-in-a-generation infrastructure projects and create a resilient, vibrant and well-connected regional city centre.

Town Centre Policy Recommendations

- 9.75 As set out earlier in the report, a key element of the Study is the understanding of the qualitative nature of the town centres, and the important roles these centres play in meeting residents' needs and supporting the overarching offer within the district. Taking into account the findings of the healthchecks and current investment programmes underway, we provide below a recommended policy framework for each of the centres.
- 9.76 Overall, our recommendations reflect that the policy framework should not be floorspace-led (as set out above), and instead leaning towards a place-based approach which reflects the characteristics of the centres and how these differ from each other. The evidence indicates that the principal challenge across much of the District is the need to maintain diverse, active, accessible and attractive centres in the context of changing consumer behaviour and continued growth in online retailing.
- 9.77 The hierarchy should therefore remain the basis for directing investment and development, but policies should provide greater flexibility for mixed-use, leisure, cultural, community, residential and experience-led uses, while protecting the distinctive role of each centre.

Keighley Town Centre

- 9.78 Keighley should remain a Principal Town and an important service centre for the wider Aire Valley. The policy response should focus on addressing the relatively high number of vacant units, particularly smaller premises, whilst using the substantial programme of regeneration to diversify the centre beyond traditional retail. This can be achieved through:
- Maintain Keighley's role as a Principal Town, supporting retail, leisure, office, residential, community and service uses at an appropriate scale.
 - Prioritise the regeneration of the town centre, particularly around the Airedale Shopping Centre, Market Hall, Cavendish Street and other identified regeneration opportunities.
 - Promote the reuse of smaller vacant units, particularly along High Street and North Street, through flexible policies allowing appropriate retail, leisure, food and drink, community and other town centre uses.
 - Encourage a stronger evening economy, including restaurants, cafés, cultural uses, entertainment and leisure activities, whilst avoiding excessive concentrations of any single use.
 - Support the continued improvement and diversification of Keighley Market and the proposed Creative Arts Hub, recognising their potential to increase dwell time and broaden the centre's appeal.

- Improve connections between the railway station, bus interchange, Airedale Shopping Centre, High Street and emerging regeneration sites, including better pedestrian crossings and wayfinding.
- Improve cycling infrastructure and connections between the centre and surrounding neighbourhoods.
- Promote environmental improvements in secondary areas, particularly where vacant units, poor shopfronts and traffic-dominated streets currently weaken the townscape.
- Encourage the restoration and reuse of historic buildings and improvements to shopfronts and signage.

Shipley Town Centre

9.79 The findings of our healthcheck assessment indicates that Shipley is performing reasonably well and therefore requires a protect-and-enhance rather than wholesale regeneration approach. Its strong public transport accessibility, independent sector, Market Square and emerging evening economy provide the foundations for further improvement. We therefore recommend that the policies for Shipley seek to:

- Maintain Shipley's role as an important town centre, supporting an appropriate mix of retail, leisure, office, community, residential and service uses.
- Protect and strengthen the convenience and independent retail offer, recognising its importance to the centre's distinctive character and day-to-day function.
- Support the development of the evening economy, particularly food and drink, cultural and leisure uses which complement rather than displace the centre's existing independent offer.
- Encourage the reuse of vacant smaller units, particularly where vacancies interrupt otherwise active frontages.
- Support the repurposing of the Kirkgate Centre as a community anchor, ensuring that it contributes to footfall and linked trips throughout the wider centre.
- Encourage opportunities for additional residential development within and around the centre, particularly where this can bring underused upper floors or larger premises back into productive use.
- Strengthen the Station Road connection between the railway station and town centre through improved pedestrian priority, crossings, wayfinding and public realm.
- Develop stronger walking and cycling connections between the town centre, railway station, Leeds and Liverpool Canal and Saltaire, allowing Shipley to capitalise on its strategic location.
- Extend public realm investment beyond Market Square, particularly along Kirkgate, Commercial Street, Westgate and Briggate.
- Support improvements to active frontages and shopfront quality in weaker secondary areas.
- Encourage proposals that strengthen the relationship between Shipley and Saltaire's tourism and heritage offer, increasing linked trips between the two destinations.

Ilkley Town Centre

9.80 Ilkley is identified in the assessment as vital and viable, with low vacancy, a strong independent and specialist retail offer, good leisure and hospitality provision, excellent accessibility and a high-quality environment. Overall, our recommendations are as follows:

- Protect Ilkley's position as a successful Principal Town and visitor destination, resisting development that would undermine its distinctive role. This can be done through supporting appropriately scaled retail, leisure, food and drink, cultural and tourism development which complements the existing offer.
- Support the continued use and reuse of upper floors for residential, office and other appropriate uses, helping to maintain the vitality of buildings throughout the centre.

- Encourage temporary and meanwhile uses where premises become vacant, preventing breaks in active frontage.
- Prioritise walking, cycling and public transport, whilst recognising and managing peak-period parking and traffic pressures.
- Protect and enhance heritage assets and the distinctive Victorian townscape, ensuring new development and shopfronts respect local character.
- Support the relationship between the town centre and Ilkley Moor, River Wharfe and surrounding countryside, including tourism-related initiatives and improved visitor wayfinding.
- Avoid policies that unnecessarily encourage significant expansion of retail floorspace where this could dilute the compact and successful character of the existing centre.

Bingley Town Centre

9.81 Bingley is also identified as generally vital and viable, with particularly strong convenience, service and leisure provision, low vacancy and a distinctive historic and waterside setting.

9.82 We therefore recommend that the policy framework for Bingley includes the following key elements:

- Maintain Bingley's role as an important town centre, supporting appropriately scaled retail, leisure, service, community and employment uses. This can be achieved through the protection of the centre's strong convenience and local service role, recognising the importance of Aldi, Lidl and Co-op as anchors.
- Support the independent retail and hospitality sector, which makes an important contribution to the centre's character and encourage further development of cafés, restaurants, pubs and leisure uses, building on the centre's established evening economy.
- Strengthen the relationship between Main Street, the Leeds and Liverpool Canal and Five Rise Locks, including improved signage, pedestrian routes and cycling connections.
- Promote Bingley as a visitor and leisure destination, encouraging linked trips between the canal-side attractions and the town centre.
- Undertake small-scale public realm improvements to paving, seating, landscaping and pedestrian areas, particularly along Main Street and secondary streets.
- Maintain and enhance the centre's heritage and waterside character, ensuring that new development and shopfront improvements are sympathetic to the existing townscape.

District and Local Centres

9.83 Turning to the policy framework for the district and local centres, we recommend that the local plan should adopt a proportionate approach to the smaller centres which seek to protect the important local facilities, instead of encouraging expansion. This will also include the appropriate diversification to include residential uses. Overall, we recommend that the policies seek to:

- Protect the basic convenience and service function of Local Centres, particularly shops, pharmacies, food stores, cafés, pubs and other facilities that meet everyday needs.
- Support small-scale new retail and community provision where it meets an identified local need and is appropriately scaled to the centre.
- Encourage the re-use of vacant premises and upper floors, particularly where conventional retail demand is limited.
- Allow greater flexibility in the use of premises, provided that proposals do not undermine the centre's core function or result in harmful concentrations of similar uses.

- Protect valued independent and community facilities, particularly where their loss would materially reduce local access to services.
- Support environmental and public realm improvements, including shopfront improvements, greening, seating, parking and pedestrian accessibility.
- Reflect local character in centres, particularly where conservation, heritage or neighbourhood plans identify specific design requirements.

Out of Centre Provision

- 9.84 With the above context in mind, we now turn to our assessment of specific policy options for the out of centre provision across the authority area. In this regard, national planning policy is clear that protection should be given to defined centres in order to ensure residents have a good mix of amenities available. It is acknowledged that the out of centre floorspace in the authority area has an important role to play in serving residents of Bradford district in terms of providing retail and leisure facilities but also has a much wider role and wider draw from an extensive catchment. The current offer at the out of centre destinations do not provide for a ‘traditional’ town centre and do not provide for the range of uses typically required to meet the definition of a defined centre. The role of the out of centre floorspace should therefore be recognised in the local plan, but a clear differentiation between the out of centre provision and defined centres within the district should be continued in the updated planning policy.
- 9.85 The NPPF and associated Town Centres NPPG provides a useful tool upon which to appropriately differentiate defined centres and out of centre development. Indeed, Annex 2 of the NPPF states that: ‘...existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres’. The NPPG also states that a wide range of uses, including residential, healthcare, educational development, employment and offices can all help to support the vitality and viability of a centre.
- 9.86 On this basis, the qualitative benefits of the existing defined centres within the district are their provision of smaller units to meet the needs of a wide range of operators, including independents across a range of commercial sectors. The out of centre provision is qualitatively different insofar as it provides larger scale units to predominantly meet the needs of national multiple retail and leisure operators, but do not, in the most part, provide space which is comparable to that which is provided for within the defined centres. Ensuring that this difference in the offer is retained within the district is imperative to securing the future vitality and viability of centres.
- 9.87 Given the above, whilst a recognition of the out of centre destinations within the local plan can be provided, this should not allow for future applicants to avoid the requirement to demonstrate compliance with planning policy.
- 9.88 We therefore recommend that the local plan recognises the established role and contribution of the out of centre retailing and leisure provision but that the text is clear that this recognition does not mean that they are treated as part of the defined town centre hierarchy.
- 9.89 Instead, policy should clearly differentiate between the defined centre hierarchy and existing out of centre provision and ensure that specific guidance is provided to ensure that proposals which seek to add to or alter the out centre floorspace will need to be tested against the retail and leisure policy tests of the sequential approach and impact. Differentiating between the qualitative function of defined centres and out of centre provision is key.

Hierarchy

- 9.90 The current hierarchy for Bradford is provided for by Policy EC5 of the adopted Core Strategy. The hierarchy is set out in Table 15 below.

Table 9.5: Current Adopted Centre Hierarchy

Hierarchy	Defined Centre
City Centre	Bradford
Town Centres	Keighley, Ilkley, Bingley and Shipley
District Centres	Five Lane Ends, Gillingham, Great Horton, Greengates, Thornbury and Tong Street
Local Centres	Addingham, Allerton, Baildon, Bankfoot, Barkerend Road, Bolton Junction, Burley-in-Wharfedale, Carlisle Road/Whetley Hill, Clayton, Cottingley, Crossflatts, Cross Roads (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, Wyke

9.91 Policy TC1 of the NPPF indicates that local planning authorities should define a network and hierarchy of town centres. However, very little detail is provided in this regard and, notably, neither the NPPF nor the Town Centres PPG differentiate between different types of town centre and the role each serves.

9.92 The most recent definitions provided by the Government were provided by Planning Policy Statement 4: Planning for Sustainable Economic Growth ('PPS4'), which was published in December 2009 (and was superseded by publication of the original iteration of the NPPF in March 2012). Whilst PPS4 should be considered on this basis (i.e. it is not up to date practice guidance), in the absence of any other definitions, it is of some relevance to the consideration of a retail centres hierarchy.

9.93 Annex B of PPS4 identifies that:

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

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

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

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

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

- 9.94 Having visited the centres and considered the future development aspirations and overarching future plans taking account of the commercial market, we agree in general, with the proposed hierarchy as set out in the policy approach. However, we do recommend the following changes to the local centres.

Table 9.6: Proposed Changes to the Centre Hierarchy

Centre	Recommended Change	Summary of Justification
Idle	Change from Local Centre to District Centre	Idle is a well-established centre comprising 71 units, making it one of the larger centres currently designated as a local centre. It has a broad mix of uses, including 8 convenience units (11.3%), 6 comparison units (8.5%), 24 leisure service units (33.8%), 20 retail service units (28.2%) and 5 financial and business service units (7.0%). There are 8 vacant units (11.3%), indicating that the centre remains largely occupied and active. The centre includes a number of established operators, including Aldi, Co-op Food, Go Local and Home Bargains, alongside a pharmacy and Post Office. Idle Medical Centre also adds to the range of community services available. This mix allows Idle to meet a broader range of shopping and service needs than would typically be expected of a smaller local centre. Commercial uses extend along High Street and Albion Road, with a mix of traditional shopfronts and larger-format retail premises. The centre is surrounded by a large residential area and is served by bus routes along Highfield Road, supporting access from surrounding neighbourhoods. Parts of the centre fall within the Idle and The Green Conservation Area, which adds to the centre's distinctive character, identity and sense of place. This heritage designation does not weigh against redesignation; rather, it contributes to the uniqueness of Idle as a destination. Future development would, however, need to respond sensitively to the conservation area and preserve or enhance its character and appearance. Overall, Idle's scale, range of uses, established retail and community offer, accessibility and relatively low vacancy indicate that it performs a role beyond that of a typical local centre. Redesignation as a district centre would therefore better reflect its existing function within the retail hierarchy.
Leeds Road	Change from Local Centre to District Centre	Leeds Road extends along the A647 Leeds Road and is located to the east of Bradford city centre. It forms a linear commercial corridor with a particularly strong comparison retail offer. Of its 75 units, 39 are in comparison retail use, representing 52.0% of the centre. This is notably higher than would usually be expected within a neighbourhood-focused local centre and gives Leeds Road a clear shopping function in its own right. The comparison offer is supported by 7 convenience units (9.3%), 12 leisure service units (16.0%) and 9 retail service units (12.0%), providing a reasonably broad range of supporting uses. There are 8 vacant units, equivalent to 10.7% of the total stock, meaning that the large majority of premises remain occupied. Activity is strongest towards the western part of the centre, while the environmental quality and level of activity are somewhat weaker towards the north-eastern end. Nevertheless, this does not materially detract from the overall scale or function of Leeds Road as an established commercial destination. Leeds Road lies close to the Southern Gateway, a major regeneration and growth area extending across the Leeds Road, Manchester Road and Wakefield Road corridors. Proposals for new housing, alongside improvements to transport, walking and wider connectivity, are expected to increase the population and activity within the surrounding area over the plan period. This places Leeds Road in a strong position to serve an expanding catchment and could further support its existing retail, leisure and service offer.

Centre	Recommended Change	Summary of Justification
		Leeds Road already has a strong and clearly defined comparison retail function, while the scale of planned growth around the corridor provides a realistic opportunity for its role to strengthen further. Redesignation as a District Centre would recognise both its current position within the retail network and the wider role it is likely to play as the Southern Gateway develops.
Queensbury	Change from Local Centre to District Centre	Queensbury is located to the south-west of Bradford and has an established centre focused around High Street and Brighouse Road. With 61 units, it is one of the larger local centres and serves both the local population and surrounding residential areas. It is also relatively isolated, with fewer nearby centres competing for the same catchment, which increases its importance as a local shopping and service destination. Its role is reinforced by Tesco Superstore and Co-op Food, which act as key convenience anchors and help generate regular trips to the centre. The wider offer includes 17 leisure service units (27.9%), 15 retail service units (24.6%), 10 financial and business service units (16.4%), 7 convenience units (11.5%) and 6 comparison units (9.8%). This range of shops and services allows Queensbury to meet a broad range of day-to-day needs. Vacancy is relatively low, with 6 vacant units, representing 9.8% of the total stock, indicating that the centre is generally well occupied and performing well. Its importance is also likely to increase as nearby housing growth comes forward. Planning permission has been granted for 295 dwellings off Fleet Lane in early 2026, which will add to the local population and is likely to increase use of the centre and demand for its shops and services. Overall, Queensbury's scale, convenience offer, range of services, relatively low vacancy and distinct residential catchment distinguish it from centres with a more limited local centre role. The planned housing growth at Fleet Lane is also likely to strengthen this role further. Redesignation as a District Centre would therefore better reflect both the centre's existing function and the wider population it is expected to serve..
Saltaire	Change from Local Centre to District Centre	Saltaire comprises 64 units, focused around Bingley Road and the wider historic core, and combines day-to-day shopping with independent retail, leisure and visitor-focused uses. Its mix includes 17 comparison units (26.6%), 17 leisure service units (26.6%), 15 retail service units (23.4%), 8 financial and business service units (12.5%) and 5 convenience units (7.8%). Vacancy is particularly low, with only 2 vacant units (3.1%), indicating a well-occupied and active centre. The role of Saltaire is shaped by its World Heritage Site status, Salts Mill and wider cultural and leisure offer. These attract visitors from well beyond the immediate residential catchment and support independent shops, cafés, restaurants and other leisure uses. The centre therefore performs both a local and visitor function, with leisure trips forming an important part of its activity. Saltaire railway station also provides good access to the centre and supports this wider catchment. Saltaire's relationship with nearby Shipley is also important. The two centres perform different, but complementary, roles. Shipley provides a broader range of larger-scale retail, convenience and civic functions, while Saltaire has a stronger focus on independent retail, leisure, culture, heritage and tourism. Redesignating Saltaire would therefore not seek to replicate or replace Shipley's role. Rather, the two centres can operate as part of a connected network, serving different needs and together supporting the wider Aire Valley. There is also scope for Saltaire's role to strengthen. Planning permission has been granted for the £6 million Community, Arts, Heritage and Future Technology Centre on Caroline Street, which will provide education, community and exhibition space and become a home for the

Centre	Recommended Change	Summary of Justification
		Saltaire Collection. This adds to the range of cultural and community facilities already available around the centre. Planned residential development at Queens Road, to the south of the centre, could also increase the local population and generate further trips to Saltaire. Saltaire's historic character is central to its appeal, but it also brings clear heritage sensitivities. Future development and intensification will need to respond carefully to the significance of the World Heritage Site and its historic environment. This does not undermine the case for redesignation; rather, it means that future growth should be managed in a way that protects the qualities which underpin Saltaire's existing success.
Silsden	Change from Local Centre to District Centre	Silsden is one of the larger centres in the existing local centre hierarchy, comprising 76 units and serving both the town and surrounding rural communities. It has a broad mix of uses, including 9 convenience units (11.8%), 15 comparison units (19.7%), 19 leisure service units (25.0%), 20 retail service units (26.3%) and 8 financial and business service units (10.5%). Vacancy is low, with only 5 vacant units (6.6%), indicating a well-occupied and active centre. The centre extends mainly along Kirkgate and Bridge Street, where traditional commercial frontages and independent businesses sit alongside larger retail premises. Its convenience offer, including Co-op Food, supports day-to-day shopping, while facilities such as Silsden Town Hall and Library add to its community role. Given Silsden's location and the more dispersed pattern of settlements around it, the centre also serves a wider rural catchment and provides access to shops and services that may not be available in smaller nearby settlements. This role is likely to become more important as the local population grows. Housing development has been approved across the wider Silsden area, including permission granted in 2023 for 138 dwellings off Bolton Road. This additional housing will increase the population within the centre's catchment and is likely to generate further demand for its shops, services and community facilities. Silsden does, however, experience traffic congestion, which affects movement through the centre and its overall environment. While redesignation would not in itself resolve these issues, recognising Silsden as a district centre could strengthen the case for future investment in the centre, including public realm, walking, cycling and public transport improvements. This could help reduce reliance on the private car and improve access to the centre over time. Overall, Silsden's scale, low vacancy, range of shops and services and role in serving both the town and surrounding rural communities support a higher-order designation. Planned housing growth is likely to reinforce this role further. Redesignation as a district centre would therefore better reflect Silsden's existing function and provide a stronger basis for supporting its future growth and improvement.

Boundaries

- 9.95 Policy TC1 of the NPPF requires local plans to 'define the extent of town centres and primary shopping areas'.
- 9.96 National planning policy no longer explicitly prescribes the designation of primary and secondary frontages. The Government has confirmed that the removal of this requirement reflects the general need to be flexible in planning for the future of town centres due to the rapid changes taking place in the retail and leisure industries. Whilst the removal of the requirement does not preclude local planning authorities from identifying primary and secondary shopping frontages where supported by local circumstances, we do not believe that this is merited in this instance. There is a clear need to repurpose and reoccupy centres across both authority areas in the manner that Use Class E

generally provides for. In this context, the separate designation of both primary and secondary frontages would serve no useful purpose. Instead, where appropriate, we recommend a single defined 'primary shopping area'.

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

9.98 Annex 2 also identifies that a town centre is the:

'Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.'

9.99 Annex 2 further defines main town centres uses as:

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

9.100 In this context, it is important to note that, although there is the opportunity to define separate primary shopping area and town centre boundaries, there is no general requirement to do so unless the specific characteristics of the subject centre support such an approach. Government policy specifically encourages the diversification of centres.

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

9.102 We set out below our proposed changes to the currently adopted boundaries. For clarity, the starting point in each case are the boundaries as defined within the Replacement Unitary Development Plan (RUDP). The recommended boundaries have been discussed with the Council, and changes requested directly from the Council have also been incorporated where appropriate.

Table 9.7: Proposed Changes to the Defined Boundaries

Centre	Proposed Changes
Bradford City Centre	In respect of the city centre boundary, we recommend minor changes overall, so that it follows the OS base more closely. We also recommend extending the boundary to include the hotel on Thornton Road, which is a main town centre use and forms part of the wider city centre offer, and the NCP car park to the south of Leeds Road, which serves the wider city centre offer and is an important component of the centre. We recommend excluding the German Protestant Church because it does not form part of the main concentration of city centre uses, due to the surrounding road network. With regard to the primary shopping area (PSA), we recommend including the Centenary Square building which comprises ground floor leisure uses. We also propose making minor changes elsewhere so that the boundary follows the OS base more closely.

Centre	Proposed Changes
Town Centres	
Bingley	We recommend amending the town centre boundary so that it aligns with the boundary identified in the proposed Bingley Neighbourhood Development Plan. This provides a more recent, locally prepared definition of the town centre and aligns with future development plans for the area. No changes are recommended to the PSA because the existing boundary continues to include the main concentration of retail uses in Bingley, which accords with the NPPF definition.
Ilkley	We recommend amending the town centre boundary so that it aligns with the boundary identified in the adopted Ilkley Neighbourhood Development Plan. Minor changes are also recommended so that the boundary follows the OS base more closely. No changes are recommended to the PSA because the existing boundary continues to include the main concentration of retail uses in Ilkley.
Other town centres	No changes are recommended to the existing town centre or PSA boundaries for Shipley and Keighley. We are of the view that the boundaries continue to include the main retail, service, leisure and other main town centre uses in each centre and that the PSA boundaries continue to comprise the areas where retail uses are concentrated.
District Centres	
Great Horton	We recommend extending the district centre boundary to include the Harris Court Mill site and Tesco Extra on Blacksmith Fold. Tesco forms part of the wider retail offer and functions as part of the centre. The inclusion of both sites would provide a more accurate boundary for the district centre.
Five Lane Ends	No changes are recommended to the existing district centre boundary. We are of the view that the boundary continues to include the main shops, services and other uses that form the centre, while excluding the surrounding residential areas.
Tong Street	We recommend extending the district centre boundary to the west to include the retail units along Tong Street and east of Horseman Street. These units form a continuation of the existing commercial frontage and function as part of the wider centre. No other changes are recommended.
Girlington	We recommend very minor changes to the district centre boundary so that it follows the OS base more closely. No other changes are recommended, as the existing boundary continues to include the main uses that form the centre.
Thornbury	We recommend extending the district centre boundary to include Bradford Plaza, which contains a concentration of specialist shops and cafés that forms part of the wider retail and leisure offer. We also recommend including the Dress Mart on Leeds Old Road and Thornbury Medical Centre. The medical centre serves the surrounding community, draws visits and complements the other uses in the centre.
Greengates	We recommend extending the district centre boundary to the west to include the row of commercial units on New Line, which comprise a Farmfoods supermarket and adjacent units. These units form a continuation of the centre's retail and service offer and function as part of the wider centre. We also recommend including dentist practice at 179 New Line to the east of

Centre	Proposed Changes
	the centre on New Line, as it contributes to the centre's commercial or service offer. No other changes are recommended.
Local Centres	
Addingham	We recommend amending the local centre boundary so that it aligns with the boundary identified in the Addingham Neighbourhood Development Plan. Minor changes are also recommended so that the boundary follows the OS base more closely.
Allerton	We recommend extending the local centre boundary to include the Aldi foodstore on Allerton Road. The store contributes to the centre's convenience retail offer and is well-related to the existing shops and services.
Baildon	We recommend removing the two residential units at the southwestern part of the centre (on West View). We do not propose any other changes to the rest of the centre boundary as we are of the view that the boundary continues to include the main shops, services and other uses that form the centre, while excluding the surrounding residential areas.
Bankfoot	Minor changes are proposed to the centre to align with the OS base more closely. We are of the view that the boundary continues to include the main shops and services that form the centre and provides an appropriate distinction from the surrounding residential areas.
Barkerend Road	We recommend extending the local centre boundary to include the whole Lidl unit and associated car park, together with the whole Iceland unit. These stores form part of the centre's main retail offer, and the car park serves the Lidl store. We also recommend excluding the former mosque to the west of the centre because it no longer forms part of the centre's retail, service or community offer.
Bolton Junction	We propose a minor change to add a tattoo studio on Idle Road, at the northwestern corner of the centre boundary. Apart from this change, we are of the view that the rest of the boundary continues to include the main shops and services that form the centre.
Burley-in-Wharfedale	We propose a minor change to remove residential dwellings to the west of the centre boundary, which are located on the fringe of the centre boundary and do not serve main town centre uses. We are of the view that the boundary continues to include the main shops, services and other facilities serving Burley-in-Wharfedale, while excluding the surrounding residential areas.
Carlisle Road/Whetley Hill	We recommend extending the local centre boundary to include Manningham Superstore and the adjoining commercial units to the east of the centre. We also recommend including the retail units to the south of Whetley Lane and the retail unit to the east of Toller Lane. These uses contribute to the retail and service offer and function as part of the wider centre.
Clayton	We recommend minor changes to the local centre boundary so that it follows the OS base more closely. We also recommend extending the boundary to include the commercial units on Station Road and the B&M store to the north of Bradford Road. These uses contribute to the retail and service offer and function as part of the wider centre.
Cottingley	Cottingley is proposed as a new local centre and therefore does not have an existing RUDP boundary. We recommend a boundary that includes the concentration of commercial units between Airedale Avenue and Littlelands. These uses provide shops and services for the surrounding residential area. The proposed boundary includes the commercial units while excluding the surrounding dwellings.
Crossflatts	We recommend extending the local centre boundary to include the commercial units on Canal Road. These units adjoin the existing centre, contribute to its retail and service offer and function as part of it.

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Cross Roads (Keighley)	We recommend minor changes to the local centre boundary so that it follows the OS base more closely. We also recommend excluding the single dwelling to the south of Haworth Road because it does not form part of the centre's commercial or service offer. We recommend adding a hairdresser on Haworth Rod to the boundary. No other changes are recommended.
Cullingworth	Cullingworth is proposed as a new local centre and therefore does not have an existing RUDP boundary. We recommend a boundary focused along Halifax Road that includes the cluster of commercial units between Greenside Lane and Mill Street. These uses provide a cluster of shops and services for the surrounding community. The proposed boundary includes the main commercial units while excluding the surrounding dwellings.
Denholme	We recommend extending the local centre boundary to include the charity shop, which forms part of the existing commercial frontage and contributes to the retail offer. We also recommend excluding the dwelling in the southern part of the centre on Old Road, as it does not contribute to the centre's commercial or service offer. No other changes are recommended.
Duckworth Lane	We recommend extending the local centre boundary to include the commercial units to the north-east along Lilycroft Road and the units on Girlington Road. These uses contribute to the retail and service offer and function as part of the wider centre. We also recommend excluding the dwelling on Upper Woodlands Road and making minor changes elsewhere so that the boundary follows the OS base more closely.
Eccleshill	We recommend minor changes to the local centre boundary so that it follows the OS base more closely. Residential units on Institute Road and Stone Hall Road have also been excluded from the centre boundary, to allow the centre to cover the main retail and commercial uses.
Fell Lane/Oakworth Road (Keighley)	We recommend excluding the dwellings on Clifton Street to the west of the local centre. These properties do not contribute to the centre's commercial or service offer. No other changes are recommended, as the remainder of the boundary continues to include the main retail uses within the centre.
Frizinghall	Minor changes are proposed to the centre boundary to remove residential units to the north of the centre on Aireville Road which are not considered main town centre uses.
Harden	Harden is proposed as a new local centre and therefore does not have an existing RUDP boundary. We recommend two separate boundaries to reflect the dispersed pattern of shops and services. One includes the units along Harden Road opposite Harden Primary School, while the other includes the units along Wilsden Road to the north of Spring Row and Sunny Mount. The separate boundaries include the main commercial units without including the dwellings between them. Taken together, the two groups of uses provide shops and services for the surrounding community.
Haworth (Main Street)	We recommend excluding the dwellings to the west of Main Street because they do not contribute to the centre's commercial or service offer. We also recommend extending the boundary to include the commercial uses to the south of the centre which comprise two leisure uses to the west of Rawdon Road. These uses form a continuation of the existing frontage and contribute to Haworth's retail, service and visitor offer. No other changes are recommended.
Haworth (Mill Hey)	We recommend excluding the dwellings and landscaped areas along Victoria Road because they do not form part of the centre's commercial or service offer. No other changes are recommended, as the remainder of the boundary continues to include the main uses that form the centre.
Heaton	Heaton is proposed as a new local centre and therefore does not have an existing RUDP boundary. We recommend a boundary focused along Highgate, extending from the units

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	adjoining Heaton Graveyard eastwards towards Ashwell Road and including the further units to the south of Ashwell Road. These uses provide shops and services for the surrounding community. The proposed boundary includes the main commercial units while excluding the surrounding dwellings.
Holme Wood	We recommend extending the local centre boundary to include the whole Holme Wood Social Club site, including its associated car park and landscaping. The social club is a leisure and community use that functions as part of the centre and draws visits from the surrounding area. We also recommend removing landscaping at Sandmead Close from the boundary. Though it adds to the beauty of the centre, it is not open space that is open to the public and can serve the surrounding community. No other changes are recommended.
Horton Grange	We recommend extending the local centre boundary to include the former Anam's restaurant and the small commercial unit on Great Horton Road. These premises adjoin the existing commercial frontage and have the potential to contribute to the centre's retail, leisure or service offer. No other changes are proposed.
Idle	We recommend extending the local centre boundary to include the car parks serving Home Bargains and Aldi. The car parks form part of the store sites and serve two of the centre's main retail uses. We also recommend excluding the dwellings along Highfield Road because they do not contribute to the centre's retail offer.
Laisterdyke	We recommend amending the boundary to the west of Killinghall Road so that it includes the commercial units and excludes the dwellings on Killinghall Road. We also recommend extending the boundary to include the commercial units further north of Killingworth Road, along Leeds Road, south of Moorside Road, east of Napier Terrace and west of Marsland Place, together with three commercial units to the south of Beswick Close. These uses contribute to the retail offer and function as part of the wider centre.
Leeds Road	We recommend minor changes to the local centre boundary so that it follows the OS base more closely. We also recommend extending the boundary to include the commercial units between Gledhill Road and Whitehead Street. These units form part of the wider Leeds Road commercial frontage and contribute to the retail offer.
Lidget Green	We recommend excluding the dwellings along Beckside Road because they do not contribute to the centre's commercial offer. We recommend extending the boundary to include Zain Supermarket and its associated car park, together with two commercial units, the juice bar and the phone repair shop to the west on Beckside Road. These uses contribute to the retail and service offer and function as part of the wider centre. Minor changes are also recommended elsewhere so that the boundary follows the OS base more closely.
Low Moor	Low Moor is proposed as a new local centre and therefore does not have an existing RUDP boundary. We recommend two separate boundaries to reflect the dispersed pattern of commercial uses along Huddersfield Road. The main boundary includes the units on both sides of Huddersfield Road, extending north towards Brentford Road and Hydale Court, east towards Hammerton Road and south around Bolton Street. A second, smaller boundary includes two units to the east of Huddersfield Road and south of Netherlands Avenue. The separate boundaries include the main commercial groups without including the dwellings and other uses between them. Taken together, the uses provide shops and services for the surrounding community.
Marshfields (Manchester Road)	We recommend extending the local centre boundary in a number of places to include the existing pattern of commercial and service uses. This includes the funeral directors at the

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	northern end of the centre and Halfords Autocentre to the east of Manchester Road. These businesses contribute to the wider service offer and function as part of the centre. We also recommend excluding the row of dwellings to the east of Manchester Road (790-808).
Menston	We recommend a series of separate boundaries to reflect the dispersed pattern of shops and services along Main Street and the surrounding roads. We also recommend including the community centre and library because they serve the surrounding community, draw visits and complement the other uses in the centre. The separate boundaries include the main groups of shops, services and community uses without including the dwellings between them.
Oak Lane (Manningham)	We recommend extending the local centre boundary to include the commercial units between Bertram Road and St Mary's Road. These units contribute to the retail and service offer and function as part of the centre. Minor changes are also recommended so that the boundary follows the OS base more closely and includes the whole extent of the commercial units.
Oakworth	Oakworth is proposed as a new local centre and therefore does not have an existing RUDP boundary. We recommend a boundary focused around the junction of Keighley Road, Park Avenue and Victoria Street, where there is a concentration of shops and services serving the surrounding community. The proposed boundary includes the main commercial units while excluding the surrounding dwellings.
Princeville	We recommend minor changes to the local centre boundary so that it follows the OS base more closely. No other changes are recommended, as the existing boundary continues to include the main shops and services that form the centre.
Queensbury	We recommend extending the local centre boundary to include the Tesco superstore on Brighouse Road and Queensbury Barbell. Tesco contributes to the convenience retail offer, while the gym contributes to the centre's leisure offer. Minor changes are also recommended so that the boundary follows the OS base more closely and includes the whole of the commercial units. We also propose adding additional retail units along Sandbeds to the centre boundary. No other changes are recommended.
Riddlesden	Riddlesden is proposed as a new local centre and therefore does not have an existing RUDP boundary. We recommend a series of separate boundaries to reflect the dispersed pattern of shops and services along Bradford Road and around Grange Road and Riddlesden Street. The separate boundaries include the main commercial groups without including the dwellings between them. Taken together, these uses provide shops and services for the surrounding community.
Saltaire	We recommend extending the local centre boundary to include the commercial units on Queens Road. These units contribute to the retail and service offer and function as part of the wider centre. Minor changes are also recommended so that the boundary follows the OS base more closely.
Silsden	We recommend extending the local centre boundary to include the commercial units on Aire View and funeral directors on Bolton Road. These units form a continuation of the existing retail and service offer and function as part of the centre. We also recommend excluding the predominantly residential areas around Wesley Place and Beckside Court, together with the dwellings between Back Briggate and Briggate. These areas do not contribute to the centre's retail offer. No other changes are recommended.
Steeton with Eastburn	Steeton with Eastburn is proposed as a new local centre and therefore does not have an existing RUDP boundary. We recommend three separate boundaries to reflect the dispersed pattern of shops and services. The western group is focused around Main Road (B6265) in Eastburn, close to Sun Street; the smaller central group is located further east along Skipton Road; and the

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	eastern group is focused around Skipton Road and Keighley Road in Steeton, close to Mill Lane and East Parade. The separate boundaries include the main commercial groups without including the residential areas between them. Taken together, the uses provide shops and services for Steeton and Eastburn.
Sticker Lane	No changes are recommended to the existing local centre boundary. We are of the view that the boundary continues to include the main shops, services and other uses that form the centre, while excluding the surrounding residential areas.
Thornton	We recommend extending the local centre boundary to include the commercial units along Fountain Street and at Alan Court. These uses function as part of the wider centre. Minor changes are also recommended so that the boundary follows the OS base more closely, particularly where the existing boundary cuts through individual units as well excluding the residential use West Lane.
Undercliffe	We recommend excluding the greenspace at Elbow Lane because it is subject to an extant planning permission for residential units and does not form part of the centre's commercial or service offer. We also recommend extending the boundary to include the commercial unit at Vernon Place, which contributes to the centre's retail offer and is related to the existing commercial frontage we also propose adding the Moorside Surgery and pharmacy which serve as community uses. Minor changes are recommended elsewhere so that the boundary follows the OS base more closely.
White Abbey Road	We recommend excluding the Abbey Ballroom car park and the uses at Globe Fold because they do not function as part of the wider local centre. [Identify the uses at Globe Fold and explain why they do not function as part of the centre. Also confirm why the Abbey Ballroom car park should be excluded if it serves a leisure use within or close to the centre.] We also recommend extending the boundary to include the commercial unit on Springfield Street, which contributes to the centre's retail or service offer. Minor changes are recommended elsewhere so that the boundary follows the OS base more closely
Wibsey	We recommend minor changes to the local centre boundary so that it follows the OS base more closely. No other changes are recommended, as the existing boundary continues to include the main shops and services that form the centre.
Wilsden	Wilsden is proposed as a new local centre and therefore does not have an existing RUDP boundary. We recommend that the boundary aligns with the centre boundary identified in the Wilsden Neighbourhood Plan. The boundary includes the main concentration of shops and services serving the surrounding community.
Wrose	We recommend excluding the dwellings at Oakdale Avenue and Oakdale Grove because they do not contribute to the centre's retail offer. We recommend extending the boundary to include the commercial units to the south of the dwellings on Hillary Road and the car park serving the Co-op and adjoining shops. The commercial units contribute to the retail and service offer, while the car park serves the main convenience store and nearby units.
Wyke	We recommend extending the local centre boundary to include the pharmacy at the southern end of the centre and the whole of the car parks serving B&M and Asda. The pharmacy contributes to the community and retail offer, while the car parks serve two of the centre's main retail uses. We also recommend excluding the dwelling to the south of Clare Road and including the two commercial uses to the south of Garden Field. No other changes are recommended.

Thresholds

- 9.103 Policy EC5 currently sets out a suggested approach based on the findings of the 2019 Study. This is a tiered approach for the centres, the premise of which we agree with. However we do have alternative recommendations in respect of the thresholds to be applied to the hierarchy and set out our thoughts below. We firstly set out the current adopted policy approach:
- 'F. When assessing applications for retail, office and leisure development not in accordance with the Development Plan Documents and in an edge of centre or out of centre location, the Council will require an impact assessment if development is over:**
1. 1,500 square metres gross of floor space for Bradford city centre
 2. 1,000 square metres gross of floor space for Keighley, Shipley, Bingley, Ilkley
 3. 500 square metres gross of floor space for District Centres.
 4. 200 square metres gross of floor space for Local Centres.'
- 9.104 Policy TC4 of the NPPF states that it is appropriate to identify thresholds for the scale of edge of centre and out of centre retail and leisure development that should be the subject of an impact assessment. Any such threshold policy applies only to the impact test (all planning applications for main town centre uses that are not in an existing centre and not in accordance with an up-to-date development plan will generally be the subject of the sequential test).
- 9.105 The purpose of applying an impact threshold within the development plan which deviates from the national threshold of 2,500 sq.m, is to allow the Council to retain appropriate control in respect of the potential for development to impact on the future health of defined centres within the authority area. By applying a lower threshold, applications for developments which could potentially have a harmful effect on the overall vitality and viability of a defined centre, will need to be supported by a proportionate impact assessment which sets out the potential trade diversion impact assumptions.
- 9.106 Paragraph 16 of the Town Centres PPG provides specific guidance in relation to floorspace thresholds and states:
- 'The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace unless a different locally appropriate threshold is set by the local planning authority. In setting a locally appropriate threshold it will be important to consider the:**
- scale of proposals relative to town centres
 - the existing viability and vitality of town centres
 - cumulative effects of recent developments
 - whether local town centres are vulnerable
 - likely effects of development on any town centre strategy
 - impact on any other planned investment.'
- 9.107 Using the above guidance, we set out the justification to support our view that a lower threshold should be applied across the hierarchy of centres within the authority area.
- 9.108 In considering the setting of a local impact threshold, it is important to consider the type of development (relating to convenience and comparison goods retail uses, and leisure uses) which would, in practice, provide space for key operators who could act to 'anchor' a centre. Should one of these anchor units or operators leave a centre, there will likely be the potential for a significant adverse impact to arise.

- 9.109 As such, where there is genuine potential for an application proposal to divert a material level of expenditure away from a defined centre, or potentially remove a key tenant from that centre, there will likely be a requirement to consider the impacts arising from the proposal in detail.
- 9.110 In respect of lower order centres, the introduction of even a small convenience store nearby (of the type operated by Sainsbury's Local or Tesco Express) may have the potential to impact on the ongoing viability of key operators. Small convenience stores operated by national multiple grocers can generate a relatively substantial turnover. If this is diverted from existing retailers in defined centres, the impact on the overall vitality and viability through the loss of spend and footfall, could be of a significant adverse magnitude.
- 9.111 Therefore, in implementing a local threshold policy, it is considered more appropriate to apply a range of thresholds in accordance with the type of centre the proposed development is proximate to. The thresholds should not only apply to new floorspace, but also to changes of use and variations of condition to remove or amend restrictions on how units operate or trade in practice.

Scale of Proposals Relative to Town Centres

- 9.112 Applying the composition analysis to the PPG test, we can contrast below the relative scales of the main convenience retailer units in the centre, as well as the average size of all other units.

Table 9.7: Table of average unit size, and convenience retailer units with Bradford's Principle designated centres

Centre	Average unit size	Average convenience unit size	Average comparison unit size
City and Town Centres			
Bradford city centre	257 sq.m	187 sq.m	248 sq.m
Bingley town centre	163 sq.m	495 sq.m	120 sq.m
Ilkley town centre	158 sq.m	517 sq.m	120 sq.m
Keighley town centre	214 sq.m	882 sq.m	221 sq.m
Shipley town centre	222 sq.m	734 sq.m	174 sq.m
District Centres			
Five Lane	415 sq.m	1,976 sq.m	749 sq.m
Girlington	196 sq.m	1,082 sq.m	765 sq.m
Great Horton	153 sq.m	959 sq.m	127 sq.m
Thornbury	650 sq.m	4,102 sq.m	1,264 sq.m
Greengates	245 sq.m	1,310 sq.m	1,187 sq.m
Tong Street	169 sq.m	253 sq.m	319 sq.m

- 9.113 The analysis of unit sizes indicates that overall, the average unit size is largest within Bradford city centre but that in terms of convenience operators, the average unit sizes in the town centres is larger than in the city centre. This reflects the fact that the town centres are typically anchored by large-format convenience operators, whereas Bradford has a much wider offer in terms of retail and leisure uses.
- 9.114 There is, a threat of out-of-centre retail parks and further trade leakage to these. The establishment of an out-of-centre retail or leisure unit may not impact the larger-scale retailers in the centre (Sainsbury's, Aldi, B&M). However, the presence of these retailers is likely to be a considerable draw for visitors to the centre to undertake other shopping and activities, leading to critical spin-off trade to other units.

The Existing Vitality and Viability of Town Centres

- 9.115 We provide a summary of the health of the principal centres above.
- 9.116 A full healthcheck for each centre has been carried out. Interventions are recommended for each of the centres to improve the overall cohesion of the centres, and to ensure future viability and vitality.

Whether Local Town Centres are Vulnerable

- 9.117 The district's centres are generally performing well when considered against the key healthcheck indicators, although vacancies are particularly high within Bradford city centre, and to a lesser extent Keighley and Shipley town centres. However, the centres are often anchored by large format convenience operators who generate footfall and expenditure to support the wider businesses in the centres.
- 9.118 Furthermore, there is an ongoing pressure on centres as a result of wider commercial market pressures, and therefore the protection of centres and their offers is key to helping support local communities and encourage sustainable shopping and other amenity patterns.

Likely Effects of Development on any Town Centre Strategy and the Impact of Planned Investment

- 9.119 Overall, the establishment of a new out-of-centre retail in proximity to investment within the defined centres could jeopardise the delivery of the commercial elements of wider mixed-use schemes. Delivery of commercial floorspace as part of wider investment schemes (such as the Southern Gateway Masterplan) would inject significant investment and draw to the existing businesses in the centre. This can have flow-on impacts for investor confidence and the commitment of future potential occupiers. As such, any out-of-centre development could have the ability to jeopardise any planned investment, which is intrinsically tied to the delivery of the town centre investment.

Recommended Approach

- 9.120 In this context, our initial recommendation is that the impact threshold of relevance to the city and town centres is set at 500 sq.m for both retail and leisure proposals. This threshold would effectively be the default to be applied authority-wide.
- 9.121 The above recommendation is also reflective of the town centre vacancy rates and the potential for out of centre retail developments to become even stronger in the future at the expense of centres' vitality and viability.
- 9.122 In this regard, existing schemes such as Forster Square (21,088 sq.m) and Enterprise 5 (9,076 sq.m) provide for substantial levels of retail and leisure floorspace at edge and out of centre locations across the authority area. The units within the out of centre retail parks range from 200 sq.m up to around 3,000 sq.m, with the ability to be sub-divided and provide space for operators which would typically locate in town centres.
- 9.123 The existing out of centre commercial destinations all offer a range of comparison goods, which traditionally would have been sold from town centres. As such, the recommendation is reflective of the need to safeguard against the out of centre retail destinations becoming even stronger at the expense of the health of defined centres.
- 9.124 The district centres are generally anchored by one or two national multiple convenience stores. These operators underpin the function of these centres, drawing in custom and encouraging linked trips to the other parts of the centre. Should the viability of such stores be impacted, there is a real risk of the role of the wider centre being undermined. There are relatively few units substantially larger than 300 sq.m in any of the district centres and the level of retail floorspace is considerably less than within the town centres. As such, to lose an occupier of this

magnitude could have a significant adverse impact on the centre as a whole. Accordingly, in the local context, 300 sq.m constitutes a significant unit for the district centres.

- 9.125 The above recommendation is also reflective of the district centre vacancy rates and the potential for out of centre retail developments to become even stronger in the future at the expense of centres' vitality and viability. The existing out of centre commercial destinations all offer a range of comparison goods, which traditionally would have been sold from centres.
- 9.126 The proposed thresholds at local centre level are considered to reflect the relatively small size of some of the centres at the lower end of the retail hierarchy and their consequent potential susceptibility to alternative 'out-of-centre' provision. In practice, it is envisaged that a proposal of just greater than 200 sq.m adjacent to a local centre would generally require an impact assessment of proportionate length (i.e. for development of such a scale, impact may on occasion be able to be dealt with as part of the covering letter accompanying the application).
- 9.127 Where an application proposal is above the respective stated impact threshold, we would recommend that the applicant discusses and agrees the scope of the retail impact assessment with the relevant Council prior to submission. The lower threshold of 200 sq.m for local centres is considered appropriate due to potential for convenience stores of even a relatively small nature to substantially impact upon the performance of existing operators, due to the potential higher sales densities of such proposals. This would ensure that particular protection of these smaller centres is considered appropriately.
- 9.128 For the purpose of drafting future planning policy, it is important to qualify the area to which each local impact threshold will apply. We recommend that the threshold of relevance to the district centres (i.e. 300 sq.m) and local centres (i.e. 200 sq.m) would be applicable within 800 metres of the boundary of the relevant centre. The distance of 800 metres is broadly commensurate with the potential walk-in catchments of smaller centres and is identified by Guidelines for Providing for Journeys on Foot (The Institution of Highways & Transportation, 2000) as being the 'preferred maximum' acceptable walking distance to a centre.
- 9.129 For clarity, we consider it to be appropriate for the higher threshold of 500 sq.m to apply across Bradford when the centre-specific thresholds do not apply (i.e. beyond 800 metres of these centres), due to the lesser likelihood of significant adverse impacts arising from retail and leisure development. This general 500 sq.m threshold would therefore apply to proposals outside of the 800 metre boundary of the defined centres due to the lesser likelihood of the proposals having an impact.
- 9.130 It is important to emphasise that, whilst the locally set threshold would require the submission of an impact assessment for all edge-of-centre and out-of-centre developments exceeding the thresholds, national guidance states that the impact test should be undertaken in a proportionate and locally appropriate way, commensurate to the scale of development proposed. The level of detail would typically be agreed with planning officers during the pre-application process in order to avoid overly onerous requirements that may otherwise restrict and delay development opportunities from coming forward.
- 9.131 Based on the above, we are of the view that an impact assessment will be necessary to accompany proposals for retail and leisure uses (including those relating to mezzanine floorspace and the variation of restrictive conditions) which are not located within a defined centre where:
- the proposal provides a gross floorspace in excess of 500 sq.m gross; or
 - the proposal is located within 800 metres of either;
 - a district centre and is in excess of 300 sq.m gross; or,

- a local centre and is in excess of 200 sq.m gross.

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

Takeaway Uses

- 9.134 National planning policy recognises the role of planning in promoting healthy communities, including how the environment can impact on health and influence healthy lifestyle choices. Rising obesity rates are a nationally recognised problem. Obesity reduces life expectancy, and increases the risk of serious diseases like cancer, heart disease and diabetes. While the causes of obesity are complex, diet and environment are proven to be huge factors.
- 9.135 Public Health England (PHE) and the Local Government Association have provided a briefing on regulating the growth of hot food takeaway outlets. It acknowledges the complexity of the ways in which the environment promotes obesity and explains that actions can be taken by local authorities to reduce the extent of obesity promotion locally. It identifies that controlling the proliferation of hot food takeaway outlets has a role to play. It is acknowledged that a causal link between hot food takeaway outlets and obesity cannot be established but identifies that there is evidence of associations between obesity and the availability of fast food.
- 9.136 As well as health impacts, the new guidance recognises that hot food takeaways play a big role in town centres and other key areas across the authority area.
- 9.137 We understand that the proliferation of hot food takeaways is a concern across Bradford and although it is noted that such uses have their benefit in providing activity into the evening, there are potential wider negative impacts through closed shutters during the day, anti-social behaviour and other health matters. An important element of any future planning policy is the differentiation between hot food takeaways and other food and beverage uses which function differently, provide alternative offers and often have different opening hours.
- 9.138 Achieving an appropriate balance of uses within a centre should continue to be a priority for the local authority, and ensuring that centres provide a good mix of both daytime and evening economies and create safe and attractive environments for residents and visitors alike. Should the proportion of takeaways significantly increase within centres, then this balance of mix of uses and provision of amenities to meet the catchments' needs could decrease considerably, and residents could look elsewhere to meet their day-to-day retail, service and leisure needs. As such, future proposals to increase this provision should be monitored carefully.
- 9.139 Hot food takeaways can provide a service to local people and add to the vitality and viability of centres but also have negative impacts on health and wellbeing. As such, Bradford's policy should follow the requirements of Policy HC5 of the NPPF, which states that:

'Development proposals for hot food takeaways should be refused:

- a. Within reasonable walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or**

b. In locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social-behaviour.'

- 9.140 A 400m exclusion/proximity zone is proposed around existing and planned primary and secondary schools, reflecting established planning practice across England and evidence that this represents a reasonable walking distance within which schoolchildren are likely to access food outlets. The 400m threshold has also been used historically by Bradford and is consistent with the approach adopted by a significant number of other local planning authorities
- 9.141 The policy should identify possible amenity impacts on an area which will be taken into consideration when assessing a takeaway proposal, including:
- The impact of noise and general disturbance, fumes, smells, litter and late-night activity, including those impacts arising from the use of external areas;
 - The impact on highway safety;
 - The availability of refuse storage and disposal facilities; and
 - The appearance of any associated extensions, flues and installations.

Monitoring and Review

- 9.142 This Study provides two principal outputs: a capacity exercise which assesses future retail and leisure floorspace requirements; and health check reviews which help verify the current vitality and viability of defined centres. The retail and leisure needs assessment is derived from a number of different data inputs and assumptions.
- 9.143 It is noted that the Town Centres and Retail PPG identifies that needs assessments should be regularly reviewed. Given the technical nature of the capacity assessment exercise, it is anticipated that this will be undertaken through either a partial or full update of the assessment by a specialist consultant at an appropriate time (e.g. to coincide the preparation of development plan documents or due to significant changes in the retail and leisure sectors). In order to provide a 'rolling' monitor of the overall level of need, it is recommended that the Council regularly updates its schedule of retail and leisure commitments and that the floorspace associated with larger commitments is summed together. This should be deducted from the floorspace capacity figures identified within this report to provide for an indication of how requirements are changing over time.
- 9.144 We recommend that the healthcheck assessments provided by this Study are subject to regular review by the Council. This will ensure that the 'direction of travel' in respect of the health of centres is understood and help determine the merits of decisions made in respect of in-centre investment and additional out-of-centre retail and leisure development.
- 9.145 Paragraph 006 of the NPPG sets out a number of key performance indicators of relevance to the health of town centres. Indicators that are regularly reviewed by local planning authorities to help determine the performance of centres over time are as follows.
1. The diversity of uses within a centre can be monitored with reference to Experian Goad categories (convenience, comparison, retail service, leisure service, and financial & business service) or with regard to Use Class. Reviewing changes in representation over time can assist in understanding the changing role and function of the centre, and how it meets local residents' needs. Changes in representation may also be of consequence to the determination of planning applications for main town centre uses outside of defined town centres (which would potentially compete with the subject centre for custom).

2. The proportion of vacant properties is a clear and straightforward barometer of operator demand and can also be instructive in respect of the role of centres and their environmental quality. A large number of vacancies often impacts on visitors' perceptions of the centre and can lead to a 'spiral of decline' that is difficult to reverse. We recommend that the both the range of land uses and the number of vacant properties are reviewed by the Council on a regular basis.
 3. Pedestrian flows can be determined with reference to observations 'on the ground' or with reference to exact pedestrian count systems.
- 9.146 It is considered that the above three indicators provide metrics that allow changes and the relative performance of the centre to be measured and tracked over time. It is recommended that the collation and summary of land use, vacancy and pedestrian count data would be undertaken in the form of concise healthcheck summary reports to be issued by the Council on a regular basis.

Appendix 1 – Study Area

Appendix 2 - Household Survey Results

Appendix 3 – City and Town Centre Healthchecks

Appendix 4 – District Centre Healthchecks

Appendix 5 – Local Centre Matrix

Appendix 6 – Quantitative Retail Tables

Appendix 7 – Quantitative Leisure Tables

Appendix 8 – Proposed Boundaries

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