



NEXUS
PLANNING

Copeland Borough Council

Retail and Leisure Study Update 2021

Final Report

August 2021

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1 Introduction

Instruction

- 1.1 Nexus Planning has been instructed by Copeland Borough Council (hereafter referred to as 'the Council') to undertake an Update of the principal findings of the West Cumbria Retail, Town Centres and Leisure Study of August 2020 (also undertaken by Nexus Planning). The focus of the Update is to set out the current position in respect of the need for additional retail and leisure facilities in the centres of Copeland Borough specifically.
- 1.2 The Update will assist the Council with its preparation of the emerging Local Plan, which will set out policies and proposals to guide future development across the Borough over the period to 2038. This plan period represents a different plan period to that in the Preferred Options Draft, which ran until 2035.
- 1.3 This Update utilises the shopper survey of 1,000 households (undertaken by NEMS Market Research in January 2020) which informed the 2020 Retail, Town Centres and Leisure Study. The Study Area for the household survey comprises eight separate zones, which are broadly considered to be representative of geographic areas that may accommodate broadly similar patterns of shopping behaviour.
- 1.4 A plan of the Study Area is provided as Appendix 1, and the household survey results are provided as Appendix 2. The Study Area also includes parts of the neighbouring authority area of Allerdale, where residents may look to facilities in Copeland to meet at least some of their retail needs and leisure needs.
- 1.5 This Update therefore relies on the 2020 NEMS household survey to identify the market share of convenience goods and comparison goods shopping trips claimed by venues in Copeland Borough. As such, this report should be read with reference to the 2020 Retail, Town Centres and Leisure Study, which provides a detailed assessment of identified shopping patterns.

Structure of Report

- 1.6 Our report firstly summarises the key findings of the previous Study and the local context for the Update. We then provide up-to-date population and expenditure data for the Study Area, before providing an updated assessment of retail and leisure needs, and the implications for plan-making.

1.7 Accordingly, our report is structured as follows:

- Section 2 considers the emerging development plan policy context for this updated Retail and Leisure Study alongside the key findings of the 2020 Study;
- Section 3 provides an overview of the current and future population and expenditure levels within the defined Study Area;
- Section 4 set out an updated assessment of retail needs;
- Section 5 provides an updated assessment of leisure needs; and
- Section 6 provides a summary of our key findings and conclusions.

2 Context for the Retail and Leisure Study Update

Emerging Local Plan

- 2.1 The Council is currently preparing a new Local Plan. The Local Plan Preferred Options Draft was subject of an eight-week consultation from 20 September to 30 November 2020. The Council is currently reviewing the representations that were received through this process and currently anticipates that the Local Plan will be submitted for examination in Spring 2022.
- 2.2 The draft strategic objectives that are of relevance to the Borough's town centres and to future retail and leisure provision comprise are as follows:
- Tourism Opportunities, which seeks to promote Copeland's diverse tourism opportunities by utilising and enhancing our built heritage and promoting assets such as Whitehaven's historic harbour and Georgian Gem Town. Recognise and enhance the opportunities offered by Copeland's unique geographical location, including the potential of the unspoiled coast, beach destinations and the western Lake District.
 - Town Centre Improvements, which seeks to enhance the vitality, viability and resilience of town centres and Local Service Centres, recognising their distinctive and unique characters, by improving the housing, retail, leisure and cultural offer for visitors and residents and by ensuring they are adaptable to change.
 - Strategic Development, which seeks to focus major development in Whitehaven, and encourage complementary and additional development in Cleator Moor, Millom and Egremont and in Local Service Centres and Sustainable Villages where opportunities exist, in line with strategic infrastructure provision and environmental capacity. The Preferred Options Draft seeks to deliver a minimum housing requirement of 2,520 new homes (equating to 140 per year) between 2017 and 2035¹. Alongside this, the Draft makes provision to provide a minimum of 3,600 dwellings² (equating to an average of 200 dwellings per annum) over the plan period;
 - Sustainable Communities, which seeks to ensure that settlements are sustainable and meet the range of needs of their communities by, as far as possible, protecting existing community

¹ The Preferred Options Draft covered a period from 2017-2035, the new plan period runs from 2021 to 2038.

² This figure includes future windfall development, previous completions and extant permissions

facilities (including green infrastructure) and supporting appropriate new provision across the Borough where it is suitable for their role and function.

2.3 These objectives are in addition to the following Policies that are detailed in the Preferred Options Draft and which are of relevance to the Borough's town centres and to future retail and leisure provision:

- Policy R1PO addresses the vitality and viability of town centres and other identified villages within the hierarchy, and states that the Council will support a network of centres that comprises a diverse range of retail, residential, leisure and other main town centre uses. This will be achieved by focusing future retail, residential, leisure and other main town centre use development and investment in accordance with the hierarchy and role and function of centres set out in Policy R2PO;
- Policy R2PO relates to the hierarchy of centres and confirms that the principal town of Whitehaven will be the principal focus of new and enhanced retail, neighbourhood facilities and other main town centre uses (as defined in the National Planning Policy Framework) in Copeland;
- Policy R3PO relates to the sequential test, and states that where an application is for a main town centre use which is neither in a town centre nor in accordance with the Development Plan, applicants must submit details to demonstrate that they have carried out a sequential test to the satisfaction of the Council in accordance with national policy; and
- Policy R4PO details retail and leisure impact assessments and sets local thresholds of 500sqm for Whitehaven and in instances within 800 metres of the respective town centre boundary for the Key Service Centres (Cleator Moor, Egremont and Millom) where a threshold of 300 sq.m applies.

2.4 More generally, the Preferred Options Draft of the Local Plan confirms that the development and continued role of Whitehaven as the Principal Town Centre is a priority for the Council. This particularly relates to activity that will encourage evening and night-time uses as a means to build upon the leisure offer that maximises Whitehaven as a destination within the Lake District Coast Area. Town centre and edge of centre opportunity and regeneration sites in Whitehaven will be encouraged where development proposals meet the requirements of the sequential test and impact threshold.

- 2.5 In terms of the Key Service Centres, the Preferred Options Draft makes it clear that the Council will encourage development that supports the role of the centres, particularly where it is located within the Town Centre boundaries, provides retail facilities and services to serve the settlement and surrounding communities, encourages evening and night-time uses and strengthens and diversifies the town's offer, including in respect to the range of residential accommodation.

Town Centre Initiatives

- 2.6 As set out at Paragraph 1.6 of the 2020 Retail, Town Centres and Leisure Study, Whitehaven had been successful in progressing to the second round of funding through the Future High Streets Fund, whilst Millom and Cleator Moor had been invited to bid for potential funding opportunities through the Government's Towns Fund. This was in addition to Egremont possibly being set to receive funding through the Borderlands Inclusive Growth Deal.
- 2.7 In June 2021 it was announced that Cleator Moor had been successful in its initial application to the Government's Towns Fund and had been offered an investment of £22.5 million. This funding will be directed towards a range of projects and interventions in the town focused around the five categories set out in the Town Investment Plan namely to make Cleator Moor an Enterprising Town, a Revitalised Town, a Campus Town, a Health Town and a Connected Town. Further to this, it was announced in August 2021 that Millom's bid for £20.6 million of funding had also been successful.
- 2.8 In addition to this, in March 2021 the Government approved the Borderlands Inclusive Growth Deal. The Deal, which is anticipated to be worth £350.0 million over ten years over the whole Borderlands region, will look to improve digital and mobile connectivity across the region, to encourage green growth and to allocate £50.0 million to rural towns across the Borderlands in order to boost economic growth. As such, Egremont is potentially in line for up to £3.0 million of investment.
- 2.9 Further to these opportunities, in June 2021 Copeland Council submitted a £14.0 million funding bid through the Government's Levelling Up Fund. If successful, the funding will be directed towards the Cleator Moor Innovation Quarter, a supply chain hub at the Leconfield Industrial Estate site, a project on which Copeland Council is working in partnership with Sellafield.
- 2.10 However, it should also be noted that in December 2020 Copeland Council withdrew Whitehaven's application for a share of the Government's Future High Street Fund. This decision was taken due to the impacts of Covid-19 creating the requirement to alter the details submitted by the Council to the Government. It is understood that a refreshed bid for funding will be submitted in the future.

Principal Findings of 2020 Retail, Town Centres and Leisure Study

- 2.11 Section 11 of the 2020 Retail, Town Centres and Leisure Study provided a summary of the Study's key findings. In respect of convenience goods floorspace, a requirement for between 900 sq.m and 1,500 sq.m of additional new convenience goods sales floorspace was identified at 2035 (dependant on format and operator). Paragraph 11.5 concluded that there is a clear quantitative deficiency in terms of the convenience goods offer in Copeland, and surrounding Whitehaven in particular, that was commensurate to the quantum of floorspace that could be delivered through one additional supermarket coming forward.
- 2.12 Table 2.1 sets out the convenience goods floorspace requirement identified by the 2020 Retail, Town Centres and Leisure Study across the period to 2035.

Table 2.1 Quantitative Need for Convenience Goods Floorspace in Copeland Borough as Identified by 2020 Retail, Town Centres and Leisure Study

	2020 (sq.m)	2025 (sq.m)	2030 (sq.m)	2035 (sq.m)
Minimum Convenience Goods Requirement	1,400	1,200	1,000	900
Maximum Convenience Goods Requirement	2,400	2,000	1,700	1,500

Source: Section 8 of 2020 Retail, Town Centres and Leisure Study

- 2.13 In respect of comparison goods, the 2020 Retail, Town Centre and Leisure Study identified a requirement for between -1,300 sq.m and -2,200 sq.m of additional comparison goods floorspace at 2035 (again, dependant on format and operator) after account had been taken of any commitments, of which none were identified. In considering that there is not a requirement for 'additional' retail floorspace in the short to medium term, the 2020 Study noted that the first priority would be to find new uses for some of the existing stock, bringing back some vacant floorspace into active uses through a mix of residential, leisure and community uses. However, should there be a future demand for additional modern-format floorspace to accommodate both independent and national multiple operators, such units may need to be provided on suitable edge of centre sites.

Table 2.2 Quantitative Need for Comparison Goods Floorspace in Copeland Borough as Identified by 2020 Retail, Town Centres and Leisure Study

	2020 (sq.m)	2025 (sq.m)	2030 (sq.m)	2035 (sq.m)
Minimum Comparison Goods Requirement	0	-1,000	-1,000	-1,300
Maximum Comparison Goods Requirement	0	-1,600	-1,800	-2,200

Source: Section 8 of 2020 Retail, Town Centres and Leisure Study

- 2.14 In terms of commercial leisure needs, the key finding from the 2020 Study was an identified potential to increase both the cinema and ten-pin bowling provision within Copeland. However, the Study

noted that this was likely to be more in respect of 'boutique' style cinema or ten-pin bowling operators. In terms of the food and drink sector, an opportunity in Whitehaven to expand the offer was identified. The Study recommended that any future development opportunities within or on the edge of the town centre should accommodate a range of units suitable to accommodate both national multiple and independent leisure operators. This was in addition to opportunities to encourage further community uses within the centres, and provide space for additional independent operators which may provide flexible space for local working.

- 2.15 The impact of extending the plan period to 2038 has been considered and is discussed in the following sections.

3 Current and Emerging Trends

- 3.1 In order to provide a context for this Study and help identify the sectors that are more likely to be the subject of additional development proposals, we provide an overview of current retail and leisure trends below. In reading the below review, it should be noted that the retail and leisure sectors are dynamic and, whilst online shopping has impacted on the retail sector, new retailers and new formats continue to evolve to meet shoppers' needs.
- 3.2 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 conditions at the time of a proposal's determination. This is particularly the case given the current commercial circumstances arising from the Covid-19 pandemic, and the impact of the lockdown measures on our high streets and operators (both local and nationally). We reflect on this in more detail below.

The Current State of the UK Economy

- 3.3 The UK economy has experienced a significant shock over the past 18 months as a result of the Covid-19 pandemic and subsequent restrictions on movement and behaviour which have sought to mitigate its impact. This uncertain background has caused business investment and expenditure to decline. Household spending fell by over 20% quarter-on-quarter in the second quarter of 2020 following the imposition of national lockdown measures. This is the largest quarterly contraction on record. Retail sales volumes also suffered double-digit falls in April 2020 as all but essential stores closed during the height of the lockdown.
- 3.4 However, as a result of the gradual reopening of businesses over summer 2020, the economy returned to growth, with this gathering momentum as a greater number of sectors reopened, including hospitality and leisure services followed by the full reopening of schools. A more pronounced resurgence in the number of cases of Covid-19 resulted in the Government reinstating a nationwide lockdown in early 2021.
- 3.5 In October 2020, Experian published its Retail Planner Briefing Note 18 ('ERPBN18'), which provides comprehensive and up-to-date information on retail developments and short, medium and long term forecasts for retail planning decisions.
- 3.6 ERPBN18 (December 2020) sets out Experian's best estimate of the retail sector and future changes in expenditure at the time of its publication. Experian anticipates that the post-Covid-19 recovery will

be subdued over the coming months and that the economy will not recover to pre-Covid levels until at least 2022. In this regard, Experian consider that due to the unprecedented nature of the global pandemic, there is great uncertainty over the scale and duration of the outbreak and the resulting economic consequences. An orderly transition and adjustment to a new trading relationship resulting from Brexit is also assumed, and any uncertainty arising from this is likely to further weigh on the economy.

- 3.7 Although the medium term outlook for GDP will be shaped by the course of the pandemic, the long term outlook for GDP remains unchanged, with growth expected to remain below historic averages due to slower population rises and productivity.
- 3.8 The overall retail sales are projected to be volatile in the near term, but growth is less impacted over the medium and longer terms. The outlook for special forms of trading (i.e. internet sales, mail order) has been revised upwards. The prospects for retail floorspace has been revised down in line with weaker projections for spending and stronger projections for internet sales.
- 3.9 In terms of inflation, Office for National Statistics data³ indicates that the rate of inflation (as measured by the consumer price index) increased from 0.5% at June 2016 to a high of 3.1% at November 2017, before reducing to 0.6% at December 2020. The rate of inflation in 2021 has then increased back up to 2.4% in June 2021. 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. This has of course, been pressurised further with the impact of the Covid-19 pandemic.
- 3.10 There will still be the need and demand for physical stores, despite the increase in shopping online. This is particularly the case for convenience sales in light of the fact that the online shopping orders are still, in the majority, being picked from shelves in physical stores. In terms of comparison shopping, there will also still be the requirement for physical stores as shoppers enjoy the experience of viewing items in person, but this shopping experience will need to evolve and diversify, and seek to engage shoppers at a level which has not been explored before.
- 3.11 In terms of the grocery market, the ONS⁴ reports that the food and non-alcoholic beverage inflation rate as of May 2021 was -1.3% when compared to 12 months previous, with the inflation rate on alcoholic beverages and tobacco was 1.7% when compared to 12 months previous.

³ ONS 'Consumer price inflation tables' dataset, May 2021

⁴ ONS 'Detailed Figures by Division' dataset, May 2021

- 3.12 The long-term impacts of this period are yet to be determined, and as such it is almost impossible to predict with any meaningful certainty what effects short-term business closures and significantly reduced levels of activity will have.
- 3.13 However, as may be expected, ONS⁵ has reported that retailers which predominantly rely on customers visiting their stores recorded a big drop after they were ordered to close their doors. Dispensing chemists sold consistently more since the pandemic began than they did before, with their sales increasing strongly in March 2020, and continued to grow in June even after restrictions were eased and other non-essential stores were allowed to reopen. Non-specialised foodstores, which include supermarkets, also traded consistently above their pre-pandemic levels. However, for furniture retailers, customers returned in the summer with trade returning to pre-pandemic levels and growing further, boosted by people still spending more time at home than they used to.
- 3.14 In terms of online retailing, ONS has reported ‘...online sales reaching higher than usual levels over the course of the pandemic’. Although these levels dropped off after shops reopened in June, the proportion of online retailing began to increase in October and continued to do so into November following the reintroduction of lockdown measures. However, with the gradual reopening of the economy in Spring/Summer 2021, ONS has reported a decrease in the overall proportion of retail spending online.

Available Expenditure and the Impact of the Internet

- 3.15 Experian forecasts fairly turbulent growth in per capita convenience and comparison goods expenditure over the short term. In this regard, Experian forecasts that per capita expenditure growth in the convenience goods sector will increase substantially to 8.4% at 2020 (from -0.9% at 2019), with this growth largely attributed to consumers spending more on such goods as a result of lockdown measures. However, Experian forecasts a 6.2% decrease in per capita expenditure growth in 2021, with very limited forecast growth thereafter.
- 3.16 As the below Table 3.1 indicates, forecast increases in comparison goods spending are more optimistic following a substantial decrease of 8.5% in 2020, but it is evident that per capita comparison goods expenditure increases going forward will be below the level apparent at the turn of the millennium. Experian identifies that per capita comparison goods expenditure growth dropped from 5.4% at 2017 to 3.4% at 2018, and forecasts that it will remain between 2.9% to 3.0% per annum

⁵ ONS analysis titled ‘The impact of the coronavirus so far: the industries that struggled or recovered’, published on www.ons.gov.uk on 9 December 2020

in the medium to long term. The exception to this is the decrease noted above in 2020, which is largely a result of lockdown measures closing all but essential stores, and an anticipated growth of 6.5% in per capita expenditure in 2021 under the expectation that lockdown measures will be gradually eased and expenditure will pick up.

Table 3.1: Experian's Identified and Forecast Convenience and Comparison Goods Per Capita Expenditure Growth

Volume Growth Per Head (%)	2016	2017	2018	2019	2020	2021	2022	2023-27	2028-40
Convenience goods	3.3	1.9	1.0	-0.9	8.4	-6.2	0.2	0.0	0.1
Comparison goods	4.8	5.4	3.4	4.3	-8.5	6.5	3.8	3.0	2.9

Source: Figure 1a and Figure 1b of Experian Retail Planner Briefing Note 18

3.17 Whilst the above figures relate to a level of growth which is significantly below that which has historically been available to retailers, the situation for high street stores is exacerbated through the increasing amount of expenditure which is committed through special forms of trading⁶ and, in particular, online.

3.18 In this regard, Appendix 3 of ERPBN18 indicates that special forms of trading accounted for just under 27% of total retail sales at 2020 as a consequence of Covid-19 and subsequent to very strong growth in online retailing over the past decade. Although the growth in special forms of trading is anticipated to drop back slightly in 2021, Experian believes that special forms of trading will account for almost 30% of retail sales by 2026, increasing to around 32% by 2031.

3.19 The below Table 3.2 sets out Experian's identified and forecast level of special forms of trading as a proportion of overall convenience and comparison goods expenditure. Experian estimates that special forms of trading will account for over a third of comparison goods expenditure and over a fifth of convenience goods expenditure at 2031.

Table 3.2: Experian's Identified and Forecast Market Share of Non-Retail Sales for Convenience and Comparison Goods Sectors

Volume Growth Per Head (%)	2016	2017	2018	2019	2020	2021	2026	2031
Convenience goods	10.0	11.6	12.8	14.1	21.1	18.1	21.2	22.8
Comparison goods	18.5	20.8	22.4	23.4	30.6	29.1	33.7	36.2

Source: Figure 5 of Experian Retail Planner Briefing Note 18

⁶ Including internet sales, mail order, stalls and markets, door-to-door and telephone sales

- 3.20 The ongoing popularity of internet shopping continues to have clear implications in respect of the viability of some 'bricks and mortar' retailers. However, it is important to note that changes in how people shop also bring about some opportunities for retailers trading from the high street. In particular, many stores sell online but fulfil orders from regular stores rather than warehouses⁷, with purchases therefore helping to sustain tangible retail floorspace. As a consequence, Experian also provides an 'adjusted' estimate of special forms of trading, which relates to expenditure which is not available to actual stores.

Convenience Goods

- 3.21 Recent socio-economic conditions have led to significant shifts in convenience goods retailing, which have resulted in the 'big four' supermarket operators' market share being cut. Mintel⁸ finds that the decline of the food superstore is well established and that this can be attributed to two issues.
- 3.22 Firstly, people are undertaking food shopping in different ways. More people are living in town and city centres and more people are having difficulties financing the purchase of their own home. Mintel indicates that such people are more likely to undertake food shopping on an 'as needs' basis and are more likely to eat out or use takeaways. As such, they are less likely to have need to undertake a 'main food shop'.
- 3.23 Secondly, the current uncertainty in the economy has made hard discounters (namely Aldi and Lidl) a more attractive proposition, and are particularly thriving given that shoppers are currently having to be 'money savvy'. Discounters have also made efforts to try to compete more directly with the 'big four' supermarket operators, with larger stores, greater ranges of goods, fresh foods and premium products becoming increasingly prevalent. It is clear that the likes of Aldi and Lidl are no longer 'discount retailers' as they once were, and have better met a wider range of customers' needs through the increase in a supply of more premium products.
- 3.24 The move towards the middle ground has allowed discounters to secure market share from both superstores and smaller convenience stores. In addition, we note that discount retailers are often happy to trade alongside more upmarket convenience goods retailers (such as Marks & Spencer Foodhall) as, collectively, the two stores can meet many food shopping needs.

⁷ This is particularly the case with food shopping and speciality comparison goods purchases, where retailers often try to tap into a wider market through an online presence

⁸ 'UK Retail Rankings', Mintel, April 2018

- 3.25 The shifts in the sector are illustrated with reference to changes in retailers' market share in recent years, as shown in Table 3.3.

Table 3.3: Market Share of convenience goods operators

Operator	December 2016	December 2017	December 2018	December 2019	December 2020
Tesco	28.4	28.1	27.8	27.4	27.3
Sainsbury's	16.5	16.5	16.1	16.0	15.9
Asda	15.3	15.3	15.2	14.8	14.3
Morrisons	10.8	10.8	10.6	10.3	10.4
Aldi	6.2	6.8	7.4	7.8	7.4
Co-op	6.3	5.8	5.9	6.1	6.0
Lidl	4.6	5.0	5.3	5.9	6.1
Waitrose	5.1	5.2	5.0	5.0	5.0
Iceland	2.2	2.2	2.2	2.3	2.5
Symbols & Independent	1.8	1.7	1.5	1.6	1.7
Other Outlets	1.7	1.6	1.7	1.6	1.8
Ocado	1.1	1.1	1.2	1.3	1.6

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

- 3.26 Over the past couple of years, the market has witnessed the closure of unprofitable foodstores, particularly operated by Tesco and Morrisons but a substantial investment plan from the likes of Aldi and Lidl over the coming years, which will likely further shift the grocery market in the short and medium term.

Comparison Goods

- 3.27 The comparison goods sector is currently being squeezed by a number of factors, the most substantial being the effects of Covid-19 and the efforts to contain it. Other factors include reduced expenditure growth, the ability of internet shopping to plug gaps in retailer representation, increases in the minimum wage, and business rates changes.
- 3.28 This 'perfect storm' has resulted in changes in the structure of retailing on the UK high street and a generally lesser reliance on comparison goods retail. To underscore this, the Centre for Retail Research reported that 2020 was the worst year for the retail job losses in more than 25 years. Around 180,000 retail jobs were lost in total, with this figure representing a rise of almost a quarter on 2019⁹.
- 3.29 Whilst the sector is continually evolving and there are a number of ongoing success stories (including Primark, Zara, Jack Wills, Joules and Hotel Chocolat), recent headlines have focussed on failing retailers and store closures. High profile retailers that have struggled include Debenhams, which

⁹ Article headlined 'Retail sales in 2020 'worst for 25 years'', BBC, 12 January 2021

announced the closure of all 124 stores in December 2020¹⁰ and the Arcadia Group, which owned Topshop, Topman and Dorothy Perkins, which in February 2021 announced the closure of around 500 stores¹¹. Furthermore, Intu Properties, one of Britain's biggest shopping centre owners, fell into administration in June 2020 after failing to secure an agreement with its creditors¹².

- 3.30 Whilst the loss of some of the above names will have significant repercussions for certain towns (particularly those that lose Debenhams, Marks & Spencer or House of Fraser from their high street in very quick succession), some well-known retailers have failed to 'move with the times' and update their offer, accommodation and online presence. This is partly a consequence of retailers struggling to reinvest in their business when margins are tight (or non-existent).
- 3.31 It will be interesting to see whether any permanent change in working from home may act to counterbalance the polarisation trend, given the prospect of fewer commuters in larger centres and greater numbers of people spending the working day in and around their home. The impact on larger centres may be to reduce footfall, particularly within the week, and result in the shift in expenditure being directed to the smaller town, district and local centres. Whilst this will be a positive for the smaller centres, the city centre may suffer as a result.
- 3.32 Whilst structural changes have had a material impact on the vitality and viability of many UK high streets, there are some beneficiaries. In particular, household discount operators, such as B&M Bargains, Poundland and Wilko, have reoccupied a number of medium to large retail units. However, as evidenced by the failure of Poundworld, there is some evidence that this market may be approaching capacity.
- 3.33 It remains to be seen what additional long-term impacts will eventuate from retail closures resulting from Covid-19 containment measures. However, prior to the implementation of lockdown measures, trading conditions for retailers were challenging and many retailers were struggling to meet costs, including rents, resulting in a higher proportion of retailers restructuring or entering administration. As has been seen throughout 2020 and 2021, the conditions have only become more challenging.

¹⁰ Article headlined 'Debenhams set to close putting 12,000 jobs at risk', BBC, 1 December 2020

¹¹ Article headlined 'After Topshop owner Arcadia's demise, what now for UK clothes shopping?' The Guardian, 13 February 2021 16

¹² Article headlined 'Shopping centre owner Intu collapses into administration', The Guardian, 26 June 2020

Leisure and Food & Drink

- 3.34 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 focussed around food and drink operators.
- 3.35 More generally, the food and drink sector has also been buoyed in recent years by the success of mid-market national multiples, which expanded quickly across the UK. However, there are signs that the market is becoming saturated in some 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 of shoppers to choose local operators over the bigger, regional and national brands. This is particularly the case for the smaller centres in the authority area.
- 3.36 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 'competitive socialising' concepts, which include bowling, crazy golf, table tennis, darts, axe-throwing and other seemingly niche pursuits.
- 3.37 Cinema openings have been on the up in recent years 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.
- 3.38 More generally, the gym market continues to perform well, with the Leisure Database Company identifying that there are now more than 7,000 gyms across the UK, with the fitness market having an estimated value of more than £5bn. The Leisure Database Company suggests that this is a 'golden age of fitness', with around one in every seven Britons having 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.
- 3.39 There is a concern that the implications of the pandemic will be particularly felt on the leisure sector, with some facilities not being allowed to reopen until July 2021. The full impact on the leisure sector

as a whole will really evolve throughout the remainder of 2021 and into 2022, and it is clear that the industry is not 'in the clear' yet.

Planning Reform on the High Street

- 3.40 One of the most impactful planning reforms of the last year has been the consolidation of a number of separate Use Classes under a single 'Commercial, Business and Service' Class E. This update to the Town and Country Planning (Use Classes) Order 1987 (the 'UCO') in July 2020 came into effect in September 2020. It combines shops, restaurants, offices, gyms and nurseries (amongst others) that no longer require planning permission to switch uses.
- 3.41 Then, in March 2021, an update was made to the General Permitted Development (England) Order 2015 (the 'GPDO'). 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 2 years and vacant for 3 months. Also, an application to the Council for 'Prior Approval' for limited consideration of impacts related to transport, contamination, flood risk, noise, the provision of natural light, and the potential effect of providing residential accommodation within an industrial area. Further limitations apply in Conservation Areas and for nurseries, as well as in areas covered by 'Article 4 directions' where the rights do not apply.
- 3.42 Article 4 directions are issued under article 4 of the GPDO, and allow for Councils to withdraw permitted development rights from defined areas. However, after notifying the Secretary of State of their intention to make an Article 4 directions, the Secretary of State can intervene and modify or cancel an Article 4. This would occur if they do not feel it is justified as they have done on a few notable occasions in the past. They can be immediate (taking effect within a year of being issued, but liable for compensation to landowners) or non-immediate (taking effect at least a year after issue, but not liable for compensation).
- 3.43 On 20th July 2021, the latest update to the National Planning Policy Framework ('NPPF') introduced new limitations on the use of Article 4 directions (Paragraph 53). The new text significantly narrows the areas in which it is justified to introduce Article 4 directions, limiting Councils abilities to control development within their boundaries. These updates to Paragraph 53 were first put forward in the January 2021 consultation for draft revisions to the NPPF. However, the final updates differ from the initial consultation in a couple of key areas. The text recognises that the loss of the "essential core of a primary shopping area" could result in wholly unacceptable adverse impacts on an areas vitality

and viability. This is 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 introduces a requirement for 'robust evidence'.

- 3.44 On the one hand, this can be seen as good news for Councils looking to protect vulnerable centres. Protection of the vitality and viability of a high street or town centre against the adverse impacts of change of use is now listed as justification for issuing an Article 4 direction.

Implications for Copeland Centres

- 3.45 Covid-19 hasn't entirely diluted the human instinct to mix with others. Instead it has temporarily reduced the desire or ability to travel to shop, eat and socialise, therefore almost forcing on us to meet our needs in our local centres, typically focussing more on those smaller centres. In assessing the impact of the pandemic, as many local authorities and private landlords are doing, it will be important to consider the niche role of particular centres.
- 3.46 In any event, when considering the impacts on the defined centres within Copeland from the commercial market, both before and after Covid-19, we see that diversity and flexibility will be key factors in the future. Successful high streets will continue to be able to embrace these new dynamics and the flexible approach promoted by the government.
- 3.47 It is clear that the above trends have a number of potential implications for retail and leisure provision within Copeland. Whitehaven town centre is the principal retail and leisure centre within Copeland and as we demonstrate in more detail later in the report, the centre still attracts the highest proportion of convenience and comparison shopping trips from residents in Copeland and has retained its importance as a commercial destination within the wider area.
- 3.48 This is particularly the case given the relatively rural nature of Copeland and the study area and the importance of ensuring that there is a principal centre within the region which provides for the range of operators residents require. The centre's offer is dominated by its convenience provision and wider leisure and service offer but it is also an important destination to serve shoppers comparison needs. In this regard, we believe that the strong convenience goods offer in and around Whitehaven helps to sustain the centre, and should help ensure that it has a viable role going forward.
- 3.49 Whitehaven also benefits from a strong transient workforce and tourism custom, both of which can help to sustain the future of the centre and both of which must be nurtured moving forward and linked to a quality leisure/visitor experience.

- 3.50 The immediate and direct implications of the Covid-19 outbreak have been two-fold. Firstly, the necessary social distancing measures impact customer access and interactions within stores, restaurants and other high street facilities. Additionally, and more significantly in the long-term, the reduction of an office based-workforce across larger centres has led to a stark reduction in demand for high street amenities from workers. On the other hand, this has led to increased 'hyperlocalism', as home workers frequent local high streets instead of facilities focussed around a commute.
- 3.51 The latest pressures on our high streets will likely affect demand for space and its use, the design of buildings and public realm, and transport access. Indeed, the changes in working habits will likely impact on the way we live longer-term, resulting in a need for residents to shop and work locally, and enjoy the local services and leisure activities. In this regard, the sub-regional centres have struggled more during the relaxing of the lockdown measures given that a higher proportion of workers are still working from home and making the most of facilities within the smaller local town centres. This may result in a decrease in retail space overall, a trend which has been witnessed in Copeland's centres pre-Covid in any event.
- 3.52 The pandemic has given time to take stock and reflect on how to reboot our town centres in light of a change in shopping and leisure habits and in an online world, and Copeland's centres are no different. Many commentators foresee that our high streets and town centres will in years to come have fewer but more vibrant and varied shops, specialising in niche or local goods, which the pandemic has shown are prized by the people who live there. There is a real opportunity (which is already being driven forward by the Council) to establish the niche and specialist roles of Copeland's centres to meet not only residents' needs but also tourist and visitor needs. Diversification of the centres to include a greater proportion of town centre living will also be key to encouraging footfall throughout the day and evening, and driving further expenditure through the tills of the operators.

4 Study Area, Population and Expenditure

Study Area

- 4.1 In January 2020, a survey of 1,000 households was undertaken by NEMS within the defined Study Area in order to ascertain where residents go to undertake a range of shopping and leisure activities. The Study Area is derived from that utilised by the 2009 and 2012 Addendum to the West Cumbria Study, and is purposely drawn to incorporate parts of neighbouring authorities. A plan of Study Area is provided as Appendix 1.
- 4.2 We confirm that we consider the Study Area to be sufficiently extensive and that the survey is worded in an appropriate manner, such that it provides an accurate representation of shopping and leisure behaviour. Whilst some limited time has elapsed since the undertaking of the survey, we do not believe that any changes in provision 'on the ground' in Copeland and its surrounding area are of sufficient magnitude that they will likely result in markedly different patterns of behaviour. As such, we believe that the 2020 survey is able to form an appropriate basis upon which to undertake this Update¹³. The household survey questions and full tabulated responses are provided at Appendix 2.
- 4.3 The defined Study Area has been broken down into eight separate zones (in a manner which is also consistent with the 2009 and 2012 Study) which reflect postcode sectors. The eight zones are considered to be representative of geographic areas that may accommodate broadly similar patterns of shopping behaviour. The below Table 4.1 sets out the postcode sectors which define each of the zones.
- 4.4 The zones were used as the basis for the NEMS household survey and inform the needs assessments set out at Section 4 of this report. The Copeland authority area broadly comprises Zones 6 to 8. Further details in relation to shopping patterns across the Borough and the market shares achieved by individual facilities are set out at Section 7 of the 2020 Retail, Town Centre and Leisure Study.

¹³ Appropriate account needs to be taken for convenience goods floorspace which has been implemented subsequent to the undertaking of the survey, and we explain our methodology in this regard at Section 4 of this report

Table 4.1: Study Area Zones by Postcode Sector

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

Study Area Population

- 4.5 The population within each postcode sector and each zone at 2021 has been calculated using Experian Micromarketer G3 data¹⁴. In estimating the future population of the Study Area, consideration has been given to the Council's planned population growth across the timeframe of the Local Plan to 2038.
- 4.6 In this regard, we are informed by the Council that it is planning for Copeland's population to increase by 3,940 persons between 2021 and 2038. This equates to annual average population growth of 232 persons each year from base year 2021 based on projections within the Strategic Housing Market Assessment 2021.
- 4.7 The Study Area zones cut across local authority areas, with some zones falling outside the Copeland authority area (and in neighbouring authority areas such as Allerdale). Where a zone encompasses both Copeland and a neighbouring authority area, there is a need for it to be sub-divided in order to account for growth both inside and outside the authority area. For areas outside Copeland, the use of Experian's own population forecasts is considered appropriate.
- 4.8 In order to apportion Copeland's future population growth in an appropriate manner, the Council has provided us with a summary schedule setting out the Council's housing supply at 2021. We have identified the location of each part of the housing supply and have therefore been able to estimate the spatial distribution of growth on a zonal basis across the authority area to 2038.
- 4.9 By noting the zonal location of each part of the Council's housing land supply, we are able to identify how future population growth will likely be delivered across the authority area in the period to 2038 and at a series of five year reporting periods¹⁵.

¹⁴ Sourced in July 2021 in order to provide the most up to date position in respect of population and expenditure.

¹⁵ Our assessment models growth and the resultant need which arises at reporting years 2026, 2031, 2036 and 2038.

4.10 Outside of the Copeland authority area, Experian's more recent population forecasts have been used¹⁶. Experian's methodology in calculating projected change in population is based on a 'demographic component model', which takes into consideration birth and death rates, and net migration.

4.11 We set out below our assumed population growth on a zonal basis at Table 4.2

Table 4.2 Estimated Study Area Population by Survey Zone

Zone	Population in Copeland Authority Area				Population Outside Copeland			Total Population Growth to 2038
	Population at 2021	Proportion of future housing growth	Population increase (2021 to 2038)	Population at 2038	Population at 2021	Population increase (2021 to 2038)	Population at 2038	
1	0	0.0%	0	0	19,749	-289	19,460	-289
2	0	0.0%	0	0	16,957	31	16,988	31
3	0	0.0%	0	0	18,257	-341	17,916	-341
4	0	0.0%	0	0	10,155	-499	9,656	-499
5	2,786	3.1%	122	2,908	33,809	-277	33,532	-155
6	39,525	67.4%	2,655	42,180	-	0	-	2,655
7	17,774	20.0%	790	18,564	-	0	-	790
8	10,364	9.5%	373	10,737	1,090	20	1,110	393
Total	70,449	100.0%	3,940	74,389	100,017	-1,355	98,662	2,585

Note: Population at 2021 derived from Experian MMG3 data; distribution of growth in Copeland Authority Area is Nexus Planning's estimate based on the methodology set out at Section 6 of this report; growth outside Copeland Authority Area is based on Experian growth forecasts and therefore represents a 'policy-off' position

4.12 The above Table 4.2 indicates that the majority of future growth in Copeland is to be located centrally, with delivery particularly high around Whitehaven (within Zone 6) and the part of the authority area that lies to the south of Whitehaven and in the centre of the Copeland authority area (within Zone 7).

4.13 We have apportioned forecast annual population growth in Copeland equally across the Plan period (i.e. we plan for growth of 232 persons per annum).

4.14 Using the above methodology, Table 4.3 sets out our estimate of future population growth across the Study Area, utilising the housing land supply pipeline provided by Copeland Borough Council and Experian Micromarketer G3 data.

4.15 We identify the assumed zonal population at each of the reporting years 2026, 2031, 2036 and 2038.

¹⁶ 2019 base year.

Table 4.3 Estimated Study Area Population by Survey Zone

Zone	2021	2026	2031	2036	2038	Methodology for Estimating Growth
1	19,749	19,712	19,630	19,533	19,460	Experian
2	16,957	17,049	17,071	16,989	16,988	Experian
3	18,257	18,229	18,124	17,964	17,916	Experian
4	10,155	10,075	9,957	9,761	9,656	Experian
5	36,595	36,660	36,538	36,479	36,440	Copeland housing land supply and Experian
6	39,525	40,306	41,087	41,868	42,180	Copeland housing land supply
7	17,774	18,006	18,239	18,471	18,564	Copeland housing land supply
8	11,454	11,560	11,689	11,808	11,847	Copeland housing land supply and Experian
Total	170,466	171,597	172,335	172,872	173,051	

Source: Table 1 of Appendix 3

- 4.16 The Study Area population will increase from 170,466 persons at 2021 to 173,051 at 2038. This equates to an increase of 2,585 over the 17-year period. In this context, planning policy seeks to manage population increase and to support and encourage future growth.

Retail Expenditure

- 4.17 In order to calculate per capita convenience and comparison goods expenditure, we have again utilised Experian Micromarketer G3 data, which provides detailed information on local consumer expenditure which takes into consideration the socio-economic characteristics of the local population. The base year for the Experian expenditure data is 2019. Our methodology takes account of the fact that some special forms of trading expenditure¹⁷ is not available to support retail floorspace, and then allows for increases in per capita expenditure growth on an annual basis.
- 4.18 Figure 5 of Appendix 3 of Experian Retail Planner Briefing Note 18 ('ERPBN18') (October 2020) provides forecasts in respect of the proportion of convenience and comparison goods expenditure that will be committed through special forms of trading both now and in the future. We have 'stripped out' any survey responses which relate to expenditure committed via special forms of trading from the dataset and have instead made an allowance derived from Experian's recommendations (which we consider to be the most appropriate means by which to account for such expenditure). In considering special forms of trading, it should be noted that many products which are ordered online are actually sourced from a store's shelves or stockroom (particularly in the case of convenience goods). As such, expenditure committed in this manner acts to sustain shops and can be considered 'available' to support floorspace within the Study Area. Accordingly, in order not to overstate the influence of special forms of trading on retailers, our methodology utilises Experian's 'adjusted'

¹⁷ Identified as comprising sales via the internet, mail order, stalls and markets, door-to-door and telephone sales (i.e. all expenditure not available to traditional retail floorspace).

allowance for special forms of trading (which is provided at Figure 5 of ERPBN18). This allowance indicates that 4.2% of convenience goods expenditure and 17.5% of comparison goods expenditure is 'lost' from shops at base year 2019 through special forms of trading purchases.

- 4.19 Having made allowance for special forms of trading, we then take account of projected changes in expenditure in accordance with the recommendations provided by Figure 6 of Appendix 3 of ERPBN18. Experian provides overall growth rates and 'adjusted' rates, which account for any additional increases in expenditure lost to special forms of trading. We set out Experian's expenditure growth estimates below in Table 4.4.
- 4.20 The latest growth rates suggest that changes in shopping behaviour associated with Covid-19 will likely influence per capita expenditure growth in the short term, but that growth in comparison goods expenditure should pick up in the medium term as confidence in the economy returns. This assumes that effective treatments are in place by mid-year 2021 and that Government measures successfully limit the fallout on jobs and business failures. The outlook is different in respect of convenience goods, with substantial short term growth apparent in 2020, as a consequence of 'stockpiling' in the early part of the year and additional meals being consumed at home whilst there are restrictions on travel and behaviour. Thereafter, Experian assumes that this additional convenience goods spending will be reversed when greater normality returns and that shoppers will continue to embrace discount foodstores in order to secure good value going forward.
- 4.21 For convenience goods, Experian estimates annual per capita growth of 8.4% in 2020, followed by a 6.2% contraction in per capita expenditure. Experian then forecasts very limited per capita growth across the remainder of the period to 2038. The position is even more pessimistic when account is taken of future growth in special forms of trading, with Experian's forecasts suggesting that there will be a very small reduction in annual convenience goods expenditure per capita in every year between 2023 and 2031, with no or limited growth forecast between 2032 and 2038. Overall, it is evident that per capita convenience goods expenditure is forecast to remain very similar across the entire period 2020 to 2038.
- 4.22 The position in respect of comparison goods expenditure is more positive. Experian forecasts that per capita comparison goods expenditure growth will recover from a decline of 8.5% at 2020 to grow by 6.5% at 2021 and 3.8% at 2022, thereafter remaining at 2.8% or 2.9% per annum in the period from 2023 to 2038. Experian's forecast suggests that there will be relatively healthy growth in comparison goods even after accounting for expenditure lost to special forms of trading.

Table 4.4 Experian Retail Planner Briefing Note 18 Convenience and Comparison Goods Annual Per Capita Growth Rates

Year	Convenience Goods	Convenience Goods 'Adjusted SFT'	Comparison Goods	Comparison Goods 'Adjusted SFT'
2020	8.4	6.1	-8.5	-14.5
2021	-6.2	-5.3	6.5	8.1
2022	0.2	0.2	3.8	2.9
2023	0.0	-0.3	3.6	2.7
2024	0.1	-0.2	2.9	2.0
2025	0.1	-0.1	2.8	1.9
2026	0.0	-0.2	2.9	2.0
2027	-0.1	-0.2	2.9	2.1
2028	0.0	-0.1	2.8	2.3
2029	0.0	-0.1	2.9	2.4
2030	-0.1	-0.2	2.9	2.5
2031	0.0	-0.1	2.9	2.5
2032	0.0	0.0	2.9	2.5
2033	0.1	0.0	2.9	2.6
2034	0.1	0.0	2.9	2.6
2035	0.1	0.1	2.9	2.7
2036	0.1	0.0	2.9	2.7
2037	0.1	0.0	2.9	2.7
2038	0.1	0.1	2.9	2.8

Source: Figure 6 of Appendix 3, Experian Retail Planner Briefing Note 18 (December 2020)

- 4.23 Growth in expenditure forecasts in the longer term (beyond the next ten years) should be treated with caution given the inherent uncertainties associated with predicting the performance of the economy over time (particularly in the current economic, health and political climates). As such, quantitative capacity assessments of this nature should be reviewed on a regular basis in order to ensure that forecasts over the medium and longer term reflect changing circumstances.
- 4.24 In this regard, we note that paragraph 85 of the revised NPPF requires local planning authorities to consider likely needs '...looking at least ten years ahead', which differs from the previous requirement to meet needs across the entire plan period. We believe that this change directly reflects current economic conditions and changes in the retail sector in recent years. By applying Experian's recommendations in respect of special forms of trading and expenditure growth, we are able to produce expenditure estimates for each survey zone and the Study Area as a whole at 2021, 2026, 2031, 2036 and 2038.

Convenience Goods Expenditure across the Defined Study Area

- 4.25 Taking into account the Study Area resident population and the available per capita convenience goods expenditure, we estimate that £378.5m¹⁸ of convenience goods expenditure originates within the Study Area at 2021.
- 4.26 The below Table 4.5 indicates that available Study Area convenience goods expenditure is forecast to increase slightly to £379.7m at 2038.

Table 4.5 Total Available Study Area Convenience Goods Expenditure

2021 (£m)	2026 (£m)	2031 (£m)	2036 (£m)	2038 (£m)
378.5	378.7	377.5	379.0	379.7

Source Table 2a of Appendix 3
In 2019 Prices

- 4.27 Table 4.6 indicates that this represents a modest increase of £1.2m (or 0.3%) across the Study Area between 2021 and 2038. Given the static growth in per capita expenditure, this modest increase can be attributed to the projected small increase in the Study Area's population over the period.

Table 4.6 Growth in Available Study Area Convenience Goods Expenditure

Growth 2021-2026 (£m)	Growth 2021-2031 (£m)	Growth 2021-2036 (£m)	Growth 2021-2038 (£m)
0.2	-1.0	0.5	1.2

Source Table 2a of Appendix 3
In 2019 Prices

- 4.28 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 including staple items such as milk and bread)¹⁹. By applying this ratio, we estimate that main food shopping trips account for £283.9m of Study Area convenience goods expenditure at 2021, and top-up shopping trips account for £94.6m.

Comparison Goods Expenditure across the Defined Study Area

- 4.29 For comparison goods, Table 4.7 sets out our estimate that the resident population of the Study Area will generate £455.7m of comparison goods expenditure at 2021. Available comparison goods expenditure is then forecast to grow relatively substantially to £698.7m at 2038. As identified at Table

¹⁸ In 2019 prices, as is every subsequent monetary reference.

¹⁹ This is based on Nexus Planning judgement and is broadly consistent with assumptions used elsewhere in undertaking such an exercise.

4.8, this represents a substantial increase of £243.0m (or 53.3%) between 2021 and 2038. The majority of this growth is forecast to occur in the medium to longer term (i.e. after 2026).

Table 4.7 Total Available Study Area Comparison Goods Expenditure

2021 (£m)	2026 (£m)	2031 (£m)	2036 (£m)	2038 (£m)
455.7	513.7	579.5	661.2	698.7

Source Table 8 of Appendix 3
In 2019 Prices

4.30 The identified increase in comparison goods expenditure growth is relatively significant, but it represents a level of annual growth that is more circumspect than that which has been achieved in the past. This is due to both a reduction in the overall level of growth when compared to that achieved in the early part of this millennium and as a consequence of further forecast increases in expenditure committed via special forms of trading (most obviously, internet shopping).

Table 4.8 Growth in Available Study Area Comparison Goods Expenditure

Growth 2021-2026 (£m)	Growth 2021-2031 (£m)	Growth 2021-2036 (£m)	Growth 2021-2038 (£m)
58.0	123.8	205.5	243.0

Source Table 8 of Appendix 3
In 2019 Prices

4.31 We sub-divide comparison goods expenditure into eight categories, these being: 'DIY', 'Electrical' and 'Furniture' (collectively referred to as bulky goods); and, 'Clothing and Footwear', 'CDs, DVDs and Books', 'Health, Beauty and Chemist Goods', 'Small Household Goods', and 'Toys, Games, Bicycles and Recreational Goods' (collectively referred to as non-bulky goods). The proportion of expenditure directed to each sub-category is estimated by Experian on a zonal basis. Experian's estimates are reflected in the detailed expenditure tables set out at Table 7b of the 2021 Nexus Planning Quantitative Needs Assessment.

4.32 In considering expenditure growth, it should be noted that not all growth arising within the Study Area will be to support additional floorspace. Instead, account needs to be taken of: the market share of expenditure secured by retailers within the Borough; the claim made by existing retailers on expenditure growth (the future efficiency of retail floorspace); and, the expenditure that will be claimed by committed retail developments. We consider the matter of expenditure growth and future floorspace requirements in the following Section 5 of this report.

5 Updated Assessment of Quantitative Retail Need

- 5.1 Our retail capacity tables set out our step-by-step approach to estimating quantitative retail need and are provided at Appendix 3. A summary of our methodological approach and our findings are provided below.

General Approach to Estimating Need

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

Available Expenditure

- 5.3 As we set out in Section 4 of this report, available expenditure within a zone is calculated by multiplying the population at a given reporting year by the estimated per capita expenditure. The available expenditure takes into consideration:

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

Turnover

- 5.4 The turnover relates to the expenditure required by existing retailers (and by retail commitments benefitting from an extant planning permission) in order to ensure that they trade viably. For convenience goods retailers, the expected 'benchmark' turnover of existing convenience goods facilities is calculated with reference to GlobalData Convenience and Comparison Goods Sales Densities of Major Grocers 2020 and Mintel Retail Rankings 2018 data²⁰.

Surplus/Deficit

- 5.5 The expenditure surplus (or deficit) is calculated by subtracting the turnover of existing and committed floorspace from the available expenditure in the Copeland authority area. A surplus figure effectively represents an under provision of retail facilities within the Borough (which may indicate

²⁰ These datasets provide independent analysis of key grocery retailers' declared turnover and the overall floorspace in their portfolio in order to calculate national average sales densities

that additional floorspace could be supported), whereas a deficit would suggest a quantitative overprovision of retail floorspace.

- 5.6 Although a surplus is presented as a monetary figure, it can be converted to a floorspace requirement through the application of an appropriate sales density. In this regard, the floorspace requirement will vary according to operator and the likely sales density they could achieve. For example, in the case of comparison goods, non-bulky goods retailers tend to achieve higher sales densities than bulky goods retailers. However, within the bulky goods sector itself there is significant variation, with electrical retailers typically having higher sales densities than DIY or furniture retailers.
- 5.7 The turnover of destinations is generally considered with reference to retailers' net sales areas and all of the following floorspace figures relate to net sales areas.

Capacity for Future Convenience Goods Floorspace

- 5.8 In order to identify the likely need for additional convenience goods floorspace in Copeland Borough, it is first necessary to consider the performance of the current provision. In this respect the built up area of Copeland already accommodates a variety of foodstore operators. As such, we believe that many of the food shopping trips which originate within the Study Area, but are directed to facilities outside of Copeland Borough, occur principally because the trip is convenient (i.e. close to home or work), rather than due to any significant deficiencies in Copeland's offer. Consideration of convenience goods shopping patterns on a zone-by-zone basis does not suggest that there is a particular problem with shoppers driving outside the Borough to access convenience goods shopping facilities. Given this, we believe that the Copeland's existing convenience goods market share of 36.3% of Study Area convenience goods expenditure is broadly appropriate and is likely to be sustained in the future.
- 5.9 Based on the existing market share, we estimate that £159.6m of convenience goods expenditure which originates within the Study Area will be claimed by retailers in Copeland at 2021. For each convenience goods retail destination, consideration has been given as to whether any of its turnover is likely to be derived as 'inflow' from outside the Study Area.
- 5.10 The 2020 Retail, Town Centre and Leisure Study was informed by STEAM data prepared by Cumbria Tourism on tourist expenditure in Copeland. Discussions with the tourism board confirmed that an appropriate split between convenience and comparison spending is 55% to convenience to 45% to comparison. This was then appropriated on a pro-rata basis as was also applied as part of the 2009

Retail Study based on the current turnovers of stores and the likelihood of attracting tourism inflow (i.e. the larger convenience and comparison destinations will also attract the higher proportions of tourism inflow).

- 5.11 In this regard, the Tourism in Cumbria 2020: Key Facts and Trends, which is based on the STEAM data, indicates that in 2019 in Copeland, there was a total of £40.1m of direct expenditure directed towards shopping from tourists. When taking the 55:45 split between convenience and comparison spend, this equates to a total of £22.1m of convenience inflow and £18.0m of comparison inflow from tourists.
- 5.12 The 2020 figures indicate a drop in tourism spend by over 50% due to the implications of Covid-19 and the fact that tourists have had to stay at home. However, this was only for a part of the year as domestic holidays were allowed (albeit with some restrictions in place) from mid-June in 2020 until the commencement of the November lockdown. Given that local tourism is expected to increase again throughout 2021 and beyond, we have therefore adopted the pre-Covid figures. In reality, we actually expect tourism spending to increase in light of the expectation that higher numbers of people will choose to holiday in the UK, rather than abroad.
- 5.13 For each convenience goods retail destination, the identified survey derived turnover is compared to its expected benchmark performance (which is estimated with reference to company average sales densities and the estimated net sales areas of individual shops). Our assessment assumes a 'goods based' approach, which disaggregates expenditure by sector, as it is important to recognise that major foodstore operators generally also sell some comparison goods, such as clothing, household goods, books and CDs. To account for this, the typical split between convenience and comparison goods provision for each operator has been identified²¹ and this multiplier has been applied to the estimated net floorspace of each foodstore. This provides an indication of the likely floorspace dedicated to the sale of convenience goods at each store and provides for an accurate estimation of convenience goods benchmark turnover.
- 5.14 The calculation of the estimated benchmark turnover of individual stores allows an assessment to be made in respect of individual retailers' trading performance and whether (on an aggregated basis) surplus expenditure exists to support additional floorspace. For smaller shops (where it is more

²¹ Generally sourced from GlobalData Convenience and Comparison Goods Sales Densities of Major Grocers 2020, except where the data is not likely representative of how a store trades in practice. Detailed notes in respect of our approach in calculating net convenience goods sales areas are provided at Table 5 of Appendix 3

difficult to collate accurate floorspace and sales density data), we assume that stores are trading 'in equilibrium' (i.e. the survey-derived turnover equates to the anticipated benchmark turnover).

- 5.15 Our assessment is summarised below at Table 5.1 and identifies that convenience goods floorspace in Copeland Borough has an expected benchmark turnover of £134.4m at 2021, which is below the estimated survey derived turnover of £159.6m. As such, taken collectively, convenience goods floorspace is 'overtrading' by £25.2m.
- 5.16 In order to appraise the future need for additional convenience goods floorspace, it is necessary to consider how the performance of stores will be affected by forecast expenditure growth. Accordingly, Table 5.1 also sets out the anticipated increases in expenditure that will be available to the Borough's convenience goods retailers, assuming its current market share is maintained. We have assumed that the benchmark turnover of floorspace will change going forward in accordance with improvements in floorspace efficiency set out in ERPBN18.
- 5.17 Table 5.1 sets out our estimate that the convenience goods expenditure available to facilities in Copeland Borough will be £159.6m at 2026, decreasing to £159.2m at 2031, and then increasing to £159.8m at 2036, and then to £160.1m at 2038. When the forecasted increase in available convenience goods expenditure is compared to growth in the benchmark turnover of such floorspace, the identified estimated convenience goods surplus equates to £24.6m at 2038.

Table 5.1 Quantitative Need for Convenience Goods Floorspace in Copeland Borough

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2021	134.4	159.6	25.2
2026	135.5	159.6	24.2
2031	135.5	159.2	23.7
2036	135.5	159.8	24.3
2038	135.5	160.1	24.6

Source Table 6a of Appendix 3
In 2019 Prices

- 5.18 When considering the above assessment, it should be noted that the survey only takes account of retail venues that were trading as of the date of the undertaking of the household survey (February 2020). As such, convenience goods floorspace implemented subsequent to the undertaking of the survey needs to be accounted for in a similar manner to retail commitments (i.e. the floorspace will have a claim on future convenience goods expenditure and, as such, will partly extinguish any identified capacity).

Table 5.2 Committed and Implemented Convenience Goods Floorspace in Copeland Borough

Zone	Location	Planning Application Reference	Proposal	Net Conv Sales (sq.m)	Conv Sales Density (£ per sq.m)	Estimate Turnover at 2021 (£m)
6	Main Street, Hensingham, Whitehaven	4/18/2313/0 F1	Spar convenience store and petrol filling station	252	7,825	1.9
				252		1.9

Source Table 6c of Appendix 3

Notes: Net sales area and estimated sales density reflect operator (or likely operator)

In 2019 Prices

- 5.19 We estimate that extant retail planning permissions, and floorspace implemented subsequent to August 2020, provide an estimated 252 sq.m of convenience goods sales floorspace across the Borough. We estimate that this floorspace would have a turnover of around £1.9m at 2021. A single commitment at Main Street, Hensingham in Whitehaven is noted which will be operated by Spar alongside a petrol filling station. It is understood that this convenience store is now trading.
- 5.20 Full details of the assumptions made in estimating the turnover of convenience goods commitments are provided in the notes that accompany Table 6c of Appendix 3.
- 5.21 As the below Table 5.3 demonstrates, the expenditure that is claimed by convenience goods commitments and implemented development acts to extinguish some of the identified surplus which could support additional convenience goods floorspace in the period to 2038. By 2038, an expenditure surplus of £24.6m exists to support additional convenience goods floorspace; which equates to a floorspace requirement of between 1,700 sq.m and 2,000 sq.m of convenience goods floorspace at 2038.

Table 5.3 Quantitative Need for Convenience Goods Floorspace in Copeland Borough after Commitments

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2021	25.2	1.9	23.3	1,700	2,100
2026	24.2	1.9	22.3	1,600	2,000
2031	23.7	1.9	21.8	1,600	1,900
2036	24.3	1.9	22.4	1,600	2,000
2038	24.6	1.9	22.7	1,700	2,000

Source Table 6d of Appendix 3

In 2019 Prices

Assessment of Convenience Need on a Settlement Boundary Basis

- 5.22 Table 5.4 below sets out the residual convenience expenditure capacity in Whitehaven and each of the Key Service Centres in Copeland taking account of the turnover requirements of the extant commitment for convenience floorspace.

5.23 As can be seen from Table 5.4, the only settlement within which we identify a significant quantitative need for additional convenience floorspace is Whitehaven, a position which reflects the conclusions noted above and in the 2020 Study. As with the 2020 Study a smaller quantitative need for additional convenience floorspace is noted at Millom.

Table 5.4: Quantitative Need for Convenience Goods Floorspace in Copelands's Town and Key Service Centres

Centres

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
Whitehaven					
2021	29.4	1.9	27.5	2,000	2,400
2026	28.7	1.9	26.8	2,000	2,400
2031	28.3	1.9	26.4	1,900	2,300
2036	28.8	1.9	26.9	2,000	2,400
2038	29.0	1.9	27.1	2,000	2,400
Cleator Moor					
2021	-5.5	0.0	-5.5	-400	-500
2026	-5.6	0.0	-5.6	-400	-500
2031	-5.6	0.0	-5.6	-400	-500
2036	-5.6	0.0	-5.6	-400	-500
2038	-5.6	0.0	-5.6	-400	-500
Egremont					
2021	-4.0	0.0	-4.0	-300	-400
2026	-4.1	0.0	-4.1	-300	-400
2031	-4.1	0.0	-4.1	-300	-400
2036	-4.1	0.0	-4.1	-300	-400
2038	-4.1	0.0	-4.1	-300	-400
Millom					
2021	8.0	0.0	8.0	600	700
2026	7.9	0.0	7.9	600	700
2031	7.8	0.0	7.8	600	700
2036	7.9	0.0	7.9	600	700
2038	7.9	0.0	7.9	600	700

Notes: Assumes constant market share of Study Area expenditure claimed by facilities in each respective settlement; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 18; minimum floorspace requirement based on an assumed sales density of £13,621 per sq.m at 2019 (which equates to the average sales density of the 'big four' foodstore operators); maximum floorspace requirement based on an assumed sales density of £11,264 per sq.m at 2019 (which is typical figure for discount operators)
In 2019 prices

5.24 Paragraph 8.35 of the 2020 Study noted that whilst Whitehaven could support an additional store that would not be to the detriment of the town centre and which could seek to re-distribute some of the over-trading of existing stores, it was important that any additional convenience floorspace be directed towards sites in or on the edge of Whitehaven town centre. This would help to encourage linked-trips and the associated economic benefits that could reasonably be expected to be generated. The same conclusion therefore still applies.

Capacity for Future Comparison Goods Floorspace

- 5.25 Our methodology in calculating comparison goods capacity deviates from that employed in respect of convenience goods. This is because it is difficult to accurately estimate a benchmark turnover for comparison goods floorspace, both because of the number of units involved (which are occupied by a wide variety of retailers), and due to the variation in the trading performance of floorspace depending on its location, the character of the area and the nature of the catchment. As a consequence, we adopt the position for comparison goods floorspace that it is trading 'at equilibrium' at base year 2021 (i.e. our survey derived turnover estimate effectively acts as benchmark). We assume that any comparison goods development implemented subsequent to the undertaking of the household survey in 2020 has been sufficient to meet needs and to maintain Copeland Borough's current market share.
- 5.26 We assume that there is therefore a nil quantitative need for any additional comparison goods floorspace across the Borough at 2021. Going forward, we again assume that the performance of comparison goods facilities will be commensurate with the market share for the Borough identified by the 2020 household survey.
- 5.27 The £79.9m of comparison goods expenditure claimed by facilities within Copeland Borough that originates from inside the Study Area equates to a market share of 17.5% of all such comparison goods expenditure. By making provision for inflow and 'rolling forward' this market share, our assessment finds that facilities in the Borough will attract £91.1m at 2021, increasing to £102.7m at 2026, to £115.9m at 2031, to £132.2m at 2036, and then to £139.7m at 2038.
- 5.28 Given forecast increases in comparison goods expenditure and allowing for annual forecast changes in the productivity of existing floorspace, we estimate that, at 2026, there will be an expenditure deficit of -£4.4m to support additional comparison goods floorspace within Copeland Borough. As set out by Table 5.5, this deficit is forecast to increase to -£6.4 at 2031, to -£6.9 at 2036, and then to -£6.7 at 2038.

Table 5.5 Quantitative Need for Comparison Goods Floorspace in Copeland Borough

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Surplus Expenditure (£m)
2021	91.1	91.1	0.0
2026	107.2	102.7	-4.4
2031	122.3	115.9	-6.4
2036	139.1	132.2	-6.9
2038	146.4	139.7	-6.7

Source: Table 26a of Appendix 3

Notes: Assumes constant market share (17.5%) of Study Area expenditure claimed by facilities in Copeland Borough; allows for changes in benchmark turnover sales efficiency in accordance with Table 4b of Experian Retail Planner Briefing Note 18 In 2019 Prices

- 5.29 Once more, the above assessment does not take into consideration existing commitments and the claim they will have on capacity. However, we have been advised by the Council that there are no existing comparison goods floorspace commitments in Copeland. The identified requirements in respect of additional comparison goods floorspace is set out below at Table 5.6. This confirms that there is no identified capacity to support additional comparison floorspace within Copeland across the period to 2038.
- 5.30 By virtue of our methodology which assumes that the position for comparison goods floorspace is that it is trading 'at equilibrium' at base year 2021, there is a nil quantitative need for any additional comparison goods floorspace across the Borough at 2021. A comparison goods expenditure deficit of -£4.4m is apparent at 2026, increasing to -£6.7m at 2038.
- 5.31 As a result of this identified deficit there is no identified need for additional comparison goods floorspace across the period to 2038. The minimum figure is based on the identified capacity being met through the delivery of high street retail floorspace and the maximum figure relates to capacity being met by bulky goods floorspace or in smaller centres (both of which typically accommodate retailers which achieve lesser sales densities).

Table 5.6 Quantitative Need for Comparison Goods Floorspace in Copeland Borough after Commitments

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
2021	0.0	0.0	0.0	0	0
2026	-4.4	0.0	-4.4	-600	-1,100
2031	-6.4	0.0	-6.4	-800	-1,400
2036	-6.9	0.0	-6.9	-700	-1,300
2038	-6.7	0.0	-6.7	-700	-1,300

Source Table 26d of Appendix 3

Notes: Estimated sales densities reflect format of floorspace and location
In 2019 Prices

- 5.32 In considering comparison goods commitments, it is again relevant to note that the capacity assessment is based on the market share of the local authority area being maintained going forward. As set out above, we are unaware of any significant proposed development which is likely to have a very significant impact on Copeland's future comparison goods market share.
- 5.33 However, it is important to note that as the 2020 Study noted when considering the above floorspace requirements it will be appropriate for the Council to consider changes in comparison goods shopping patterns that may arise as a consequence of future development. It is again recommended that the Council monitor any substantial proposed retail development in neighbouring authorities, such as Allerdale, in order to form a view as to whether it is likely to impact upon future floorspace requirements.

Assessment of Comparison Need on a Settlement Boundary

- 5.34 Consideration has also been given to the residual comparison expenditure capacity in Whitehaven and each of the Key Service Centres in Copeland taking account of the turnover requirements of the extant commitments for comparison floorspace. This is provided at Table 5.7 below. As with the 2020 Study and as is set out above, we can see that there is no identified quantitative capacity for additional comparison floorspace within the four settlements of Copeland.

Table 5.7: Quantitative Need for Comparison Goods Floorspace in Copeland's Town and Key Service Centres

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement	
				Minimum (sq.m)	Maximum (sq.m)
Whitehaven					
2021	0.0	0.0	0.0	0	0
2026	-3.4	0.0	-3.4	-500	-800
2031	-4.9	0.0	-4.9	-600	-1,000
2036	-5.2	0.0	-5.2	-600	-1,000
2038	-5.1	0.0	-5.1	-600	-1,000
Cleator Moor					
2021	0.0	0.0	0.0	0	0
2026	-0.2	0.0	-0.2	0	0
2031	-0.3	0.0	-0.3	0	-100
2036	-0.3	0.0	-0.3	0	0
2038	-0.3	0.0	-0.3	0	0
Egremont					
2021	0.0	0.0	0.0	0	0
2026	-0.3	0.0	-0.3	0	-100
2031	-0.5	0.0	-0.5	-100	-100
2036	-0.5	0.0	-0.5	-100	-100
2038	-0.5	0.0	-0.5	-100	-100

Millom					
2021	0.0	0.0	0.0	0	0
2026	-0.5	0.0	-0.5	-100	-100
2031	-0.7	0.0	-0.7	-100	-100
2036	-0.7	0.0	-0.7	-100	-100
2038	-0.7	0.0	-0.7	-100	-100

Notes: Assumes constant market share of Study Area expenditure claimed by facilities in each respective settlement; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 18; minimum floorspace requirement based on an assumed sales density of £6,000 per sq.m at 2019 (which equates to the average sales density of the 'big four' foodstore operators); maximum floorspace requirement based on an assumed sales density of £3,500 per sq.m at 2019 (which is typical figure for discount operators)
In 2019 prices

- 5.35 However, as noted above and in the 2020 Retail, Town Centre and Leisure Study, whilst there is not a requirement for 'additional retail floorspace in the short to medium term, the first priority would be to find new uses for some of the existing and vacant stock, through a mix of residential, leisure and community uses. However, it should be noted that should a need arise for additional modern-format retail floorspace, such units may need to be provided on suitable edge of centre sites.

6 Updated Assessment of Leisure Need

- 6.1 Our approach to the assessment of commercial leisure needs necessarily departs from our retail methodology, partly because it is difficult to source some of the required information for the leisure market. In addition, the commercial leisure sector is different to the retail sector; large-scale leisure uses are relatively limited in number and customers often expect to travel at least some distance in order to access them. As such, we believe it is sensible to consider the general appropriateness of provision on a Borough-wide basis, with reference to the typical number of persons required to support particular uses.
- 6.2 Our assessment considers the typical population required to support bingo halls, cinema screens and ten pin bowling alleys. We firstly calculate the expected Copeland Authority Area²² population for the relevant reporting years (2021, 2026, 2031, 2036 and 2038).
- 6.3 We then calculate the number of persons required to support a bingo hall, cinema screen and bowling alleys nationally, across the UK. We have identified the current level of provision across the UK with reference to the following sources:
- Mintel's Casinos and Bingo UK report (March 2019), which identifies that there are 350 bingo halls across the UK;
 - the UK Cinema Association website²³ which identifies that there are 4,596 cinema screens across the UK; and
 - Mintel's Ten Pin Bowling UK report (May 2017), which identifies that there are 5,242 bowling lanes across the UK.
- 6.4 We then apply the respective ratio to the Copeland Authority Area population in order to gauge the 'benchmark' level of provision for each type of provision.

²² Derived from Experian MMG3 data

²³ www.cinemauk.org.uk, consulted on 11 May 2021

Bingo

- 6.5 Mintel's March 2019 Casinos and Bingo UK report identifies that there are 350 bingo halls across the UK, which equates to a bingo hall for every 193,447 persons or thereabouts²⁴. As such, we estimate that the Copeland Authority Area could theoretically support less than one bingo hall at 2021.
- 6.6 Accordingly, as the below Table 6.1 demonstrates, we estimate that the Study Area population of 70,449 persons could support around 0.4 bingo halls at 2021, with no potential increase to 2038 based on the forecast population of 74,389 persons. Given that there is currently one bingo hall across the Study Area (the Opera Bingo on Tangier Street in Whitehaven), we do not believe that there is any pressing requirement for further facilities across the period to 2038.

Table 6.1 Bingo Hall Requirement in Copeland Authority Area

Year	Copeland Authority Area Population	Typical Population Required to Support Hall	Potential Number of Halls Supported by Copeland	Current Number of Halls	Outstanding Potential Requirement
2021	70,449	193,447	0.4	1	-0.6
2026	71,608	193,447	0.4	1	-0.6
2031	72,767	193,447	0.4	1	-0.6
2036	73,925	193,447	0.4	1	-0.6
2038	74,389	193,447	0.4	1	-0.6

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

- 6.7 As such, even when considering the additional demand created as a result of the tourism inflow, we do not believe that there is any requirement to plan for additional bingo hall provision across the plan period to 2038. Furthermore, in considering the potential need for additional bingo facilities, it should also be noted that the sector has been significantly affected by the ban on smoking in enclosed workplaces that came into force in 2007 as a consequence of the Health Act 2006. Subsequent to the Act being enforced, new bingo hall openings are a rare event and we consider it highly unlikely that there will be any need for additional provision in the Study Area in the foreseeable future.

Cinemas

- 6.8 The UK Cinema Association website estimates that there are 4,596 cinema screens in the UK, which equates to one screen for every 14,732 persons or thereabouts. On this basis, we estimate that the population of the Copeland Authority Area could support around 4.8 potential screens at 2021,

²⁴ Based on the Experian 2019 Populations estimates for the UK, England and Wales, Scotland and Northern Ireland, which identifies a UK population of 67,706,302 persons at 2019

increasing to around 5.0 screens at 2038. Within Copeland, there is one permanent cinema at the time of the household survey, namely The Gaiety Cinema, Whitehaven. There are also additional irregular screenings at the Millom Palladium and the Beggars Theatre, both in Millom centre. The Millom Palladium, for example, houses cinema clubs and parties.

Table 6.2 Cinema Screen Requirement in Copeland Borough

Year	Copeland Authority Area Population	Typical Population Required to Support Cinema Screen	Potential Number of Cinema Screens Supported by Copeland	Current Number of Cinema Screens	Outstanding Potential Requirement
2021	70,449	14,732	4.8	1	3.8
2026	71,608	14,732	4.9	1	3.9
2031	72,767	14,732	4.9	1	3.9
2036	73,925	14,732	5.0	1	4.0
2038	74,389	14,732	5.0	1	4.0

Note: Typical population to support a cinema screen calculated with reference to the UK Cinema Association and to Experian 2019 Population estimates for the UK, England and Wales, Scotland and Northern Ireland

6.9 As Table 6.2 demonstrates, we believe that there is currently one permanent cinema screen within the Study Area and that there is a theoretical surplus of 3.8 cinema screens at 2021, increasing to 4.0 surplus screens at 2038. However, we note that in April 2021 it was announced that the Plaza Cinema at Dunmail Park in Allerdale would not reopen following the lifting of lockdown restrictions. This facility was noted to attract a number of visits from Copeland residents as demonstrated by Table 9.5 of the 2020 Study. Despite this, the cinema's former operators have announced plans to open a 'boutique' three-screen cinema in Workington town centre, 'The Ritz', which it is understood will open at the end of September 2021. Alongside this, the owners of Dunmail Park are searching to secure a new operator to take over the complex and to continue the cinema use. Given this, and the easy access to these facilities within Allerdale, it may be that the resident population and commercial market within Copeland and the wider Study Area may not support additional facilities.

6.10 However, given the surplus within Copeland itself we concur with the recommendation of the 2020 Study which recommended that further discussions with cinema operators are undertaken to understand the market for an additional facility within Copeland, and Whitehaven in particular.

Ten Pin Bowling

6.11 Mintel's Ten Pin Bowling UK report identifies that there are 5,242 ten pin bowling lanes across the UK, which equates to a lane for every 12,916 persons or thereabouts. Accordingly, as Table 6.3 shows

we estimate that the Authority Area could support around 5.5 bowling lanes at 2021, increasing to around 5.8 lanes at 2038.

- 6.12 There are no current formal ten-pin bowling facility within Copeland or indeed, Whitehaven town centre. In this regard, whilst very few new ten pin bowling alleys were built in the early part of this century, the market has picked up in recent years. As noted at Paragraph 9.27 of the 2020 Study, this upturn in the sector has been partly assisted by a more modern type of offer, which is typically 'in centre' and aimed at those going out in the evening as much as families. The Council may wish to engage with 'modern' bowling alley operators, which may incorporate other forms of leisure activity most notably through a strong food and drink offer, in order to understand the potential of bringing such a use to Whitehaven town centre.

Table 6.3 Ten Pin Bowling Requirement in Copeland Borough

Year	Copeland Authority Area Population	Typical Population Required to Support Bowling Lane	Potential Number of Bowling Lanes Supported by Copeland	Current Number of Bowling Lanes	Outstanding Potential Requirement
2021	70,449	12,916	5.5	0	5.5
2026	71,608	12,916	5.5	0	5.5
2031	72,767	12,916	5.6	0	5.6
2036	73,925	12,916	5.7	0	5.7
2038	74,389	12,916	5.8	0	5.8

Note: Typical population to support a bowling lane calculated with reference to the UK Cinema Association and to Experian 2019 Population estimates for the UK, England and Wales, Scotland and Northern Ireland

7 Summary and Conclusions

Key Findings: Retail Need

- 7.1 The floorspace requirements identified in this Study are of some relevance to the determination of future planning applications, as they reflect the additional floorspace that can be accommodated in the Borough whilst allowing existing floorspace to benefit from turnover growth, such that the existing provision continues to trade in a viable manner.
- 7.2 In Copeland we have identified a need for between 1,600 and 1,900 sq.m of additional convenience floorspace at 2031 (i.e. looking ten-years ahead as stipulated in the NPPF). Although these figures vary slightly from the additional floorspace of between 1,400 and 2,400 sq.m identified at 2030 by the 2020 Study, they represent a need that has arisen largely due to the current identified overtrading of facilities in the Study Area. As with the 2020 Study, we particularly note that the Aldi and Morrisons in Whitehaven are identified as substantially overtrading, along with the Tesco store.

Table 7.1 Updated Quantitative Need for Convenience Goods Floorspace in Copeland Borough

	2021 (sq.m)	2026 (sq.m)	2031 (sq.m)	2036 (sq.m)	2038 (sq.m)
Minimum Convenience Goods Requirement	1,700	1,600	1,600	1,600	1,700
Maximum Convenience Goods Requirement	2,100	2,000	1,900	2,000	2,000

Source Table 6d of Appendix 3

- 7.3 As Table 7.1 demonstrates there remains a clear quantitative need for additional convenience goods floorspace in Copeland and in particular Whitehaven, and the delivery of an additional store could assist not only to meet this need but to also achieve the Council's wider regeneration aspirations for Whitehaven.
- 7.4 In addition to this additional convenience goods floorspace is also likely to be delivered over the plan period to meet localised needs, likely in the form of small-scale convenience stores and petrol filling station kiosks. We reiterate the conclusions at Paragraph 11.11 of the 2020 Study which states that on this basis:

"we believe that, subject to the identification of appropriate sites and there being no unacceptable town centre impacts arising as a consequence of development, securing additional foodstore provision at Whitehaven should address identified quantitative capacity in the period to 2030 (i.e. the ten-year period identified as being of principal relevance for plan-making purposes by paragraph 85 of the NPPF)."

- 7.5 In terms of comparison goods, we again identify a nil requirement for additional floorspace across the reporting period to 2038.

Table 7.2 Updated Quantitative Need for Comparison Goods Floorspace in Copeland Borough

	2021 (sq.m)	2026 (sq.m)	2031 (sq.m)	2036 (sq.m)	2038 (sq.m)
Minimum Comparison Goods Requirement	0	-600	-800	-700	-700
Maximum Comparison Goods Requirement	0	-1,100	-1,400	-1,300	-1,300

Source Table 26d of Appendix 3

- 7.6 As noted above, should a future need for additional modern-format floorspace to accommodate both independent and national multiple operators arise, such units may need to be provided on suitable edge of centre sites.

Key Findings: Leisure Need

- 7.7 In terms of the leisure sector, we identify that the provision of cinema screens in Copeland is insufficient to meet the identified requirement of 4.8 screens at 2021, increasing to 5.0 screens at 2038. However, whilst the recent changes in cinema provision within the Allerdale Authority Area are noted, it is anticipated that a reasonable cinema provision will continue within Workington in particular. It is anticipated that any facilities are likely to attract a number of visits from Copeland residents. Therefore, it may be that the resident population and commercial market within Copeland and the wider Study Area may not support additional facilities.
- 7.8 Even when considering the additional demand created as a result of the tourism inflow, we do not believe that there is any requirement to plan for additional bingo hall provision across the plan period to 2038. However, we do identify that the Copeland Authority Area could potentially support 5.5 bowling lanes at 2021, increasing to 5.8 at 2038. Given this potential requirement, the Council may wish to engage with operators, especially those which focus on the 'modern' provision, which may incorporate other forms of leisure activity most notably through a strong food and drink offer, which has expanded over recent years.
- 7.9 It is considered that opportunity may exist to expand or to diversify the commercial leisure provision in Copeland, and within Whitehaven in particular. This could include the introduction of new leisure concepts, including 'competitive socialising' such as bowling, crazy golf and other similar pursuits. However, these opportunities should be informed by engagement with potential operators.

Appendix 1: Study Area Plan

Appendix 2: Household Survey Results

Appendix 3: Quantitative Tables

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