

MILTON KEYNES RETAIL CAPACITY & LEISURE STUDY - 2018

Final Report

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1 INTRODUCTION

- 1.1 Carter Jonas ('CJ') has been instructed by Milton Keynes Council (the 'Council') to prepare the *Retail Capacity and Leisure Study* (the 'Study') that will be used as evidence to inform the preparation of the new Local Plan (Plan: MK) and other relevant supplementary planning documents.
- 1.2 The study has been prepared in the context of current and emerging national and development plan policy guidance, as well as other key material considerations; principally the *National Planning Policy Framework* (NPPF) published in March 2012. Where relevant the study also draws on advice set out in the *National Planning Practice Guidance* (PPG), published in March 2014, which places significant weight on the development of positive plan-led visions and strategies to help ensure the vitality of town centres. The sequential and impact 'tests' are also key to both plan-making and decision-taking at the local level.
- 1.3 The assessment of the need (or 'capacity') for new retail (convenience and comparison goods) floorspace has been carried out at the strategic (local authority) level to help inform the likely scale, type, location and phasing of new retail development over the short (0-5 years), medium (6-10 years) and long term (11-15 years).
- 1.4 The study/catchment area defined for the purpose of this study principally covers the Milton Keynes local authority area, but incorporates parts of neighbouring local planning authority areas (**Appendix 1**). The Study Area has been divided into 14 zones that broadly reflect the population distribution and local catchments of the main study centres. For analysis purposes Zones 1-7, 9 and 10 represent the local authority area.
- 1.5 The defined Study Area and zones provide the framework for the new telephone interview survey of some 1,400 households conducted by NEMS Market Research (NEMS). The full (weighted) survey results are set out in **Appendix 19**. The survey provides the most up-to-date and robust evidence on shopping patterns, leisure preferences and expenditure flows within the Study Area. The survey findings have also informed the health check assessments for the main study centres, as well as the quantitative ('capacity') and qualitative need assessments for new retail (convenience and comparison goods) floorspace and leisure uses.
- 1.6 For ease of reference this report is structured as follows:
- **Section 2** reviews the national and local planning policy context material to retail planning and town centres.
 - **Section 3** highlights some of the key trends that are driving the dynamic changes in the retail sector at the national and local level, and how this has shaped (and is likely to shape) the UK's urban and retail landscape.
 - **Section 4** sets out the results of the market share analysis for convenience and comparison goods shopping and leisure use across the Study Area based on the household telephone interview survey. The market share tabulations for convenience and comparison goods are set out in **Appendix 13** and **Appendix 14** respectively.
 - **Sections 5-14** set out the health check methodology and key findings for Central Milton Keynes, the main District Centres of Kingston, Westcroft, Bletchley, Wolverton; and Town Centres of Newport Pagnell, Olney, Stoney Stratford and Woburn Sands. These assessments draw on the Key Performance Indicators (KPIs) identified by the Planning Practice Guidance, recent research and the latest town centre audits for the centres based on site visits. The health check assessment also takes account of the results of the household surveys for the main centres. The full survey results are set out in **Appendices 2**.

- **Section 15** provided a high level review of the relative attraction and health of the Local Centres in the Council Area, and their role and function in the network and hierarchy of the centres.
- **Section 16** sets out the key assumptions and outputs of CJ's in-house CREAT^e (excel spreadsheet) capacity model, including: the forecast population and expenditure available in the Study Area (**Appendix 10**); the forecast convenience (**Appendix 15**) and comparison (**Appendix 16**) turnovers of all existing centres/stores; and the forecast trading characteristics of all known committed retail floorspace at the time of preparing this assessment. It also presents the detailed Council-wide and main centre capacity forecasts for both convenience (**Appendix 17**) and comparison goods (**Appendix 18**).
- **Section 17** sets out the findings of the commercial leisure and other town centre uses 'gap' assessment. This looks at the main leisure uses, and identifies the potential need for new food and beverage uses, cinema and gyms.
- Finally, **Section 18** provides high level advice on where any forecast need for new retail floorspace and leisure uses could be accommodated in Milton Keynes City Centre and the main study centres, carried out in accordance with the main aims of national and local plan policy.

1.7 When considering and assessing the findings of this retail assessment it is important to understand at the outset that capacity forecasts beyond a five year time period should be interpreted with caution by the Council as they are subject to increasing margins of error. We therefore advise that although this updated study provides the robust evidence base required to help inform plan-making, site allocations and the determination of planning applications at the local level, the forecasts should be constantly monitored, and updated. These should take into account any significant new retail development and changes in the retail expenditure and population growth forecasts over time, as well as any potential impacts arising from other key trends in the retail and leisure sectors (such as, the growth in internet shopping) and commercial leisure sectors.

2 PLANNING POLICY REVIEW

- 2.1 This section provides a high level overview of the relevant national and local development plan planning policy pertaining to retail and town centre uses, along with other material considerations.

National Planning Policy Framework (NPPF)

- 2.2 The NPPF was published in March 2012 and sets out the planning policies for England and how these are expected to be applied. It reinforces the importance of up-to-date plans and strengthens local decision making. The NPPF must be taken into account in the preparation of Local Plans and Neighbourhood Plans. At the heart of the NPPF is a presumption in favour of sustainable development, which is seen as *“a golden thread running through both plan-making and decision-taking”* (paragraph 14). The NPPF (paragraph 14) sets out the Government’s view of what sustainable development means in practice for both plan-making and decision-taking at the local level.
- 2.3 For plan-making the Framework states that local planning authorities should positively seek opportunities to meet the development needs of their area. Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The Framework (paragraph 15) states that policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that *“...it is clear that development which is sustainable can be approved without delay”*.
- 2.4 The NPPF (paragraph 17) sets out twelve core planning principles that underpin both plan-making and decision-taking. Amongst other objectives these principles confirm that planning should be genuinely plan-led; proactively drive and support sustainable economic development to deliver thriving local places; promote mixed use developments; focus significant development in locations which are or can be made sustainable; and deliver sufficient community and cultural facilities and services to meet local needs.
- 2.5 The Framework (paragraph 150) emphasises that Local Plans are *“...the key to delivering sustainable development that reflects the vision and aspirations of local communities”*. They should be *“aspirational but realistic”* and should set out the opportunities for development and clear policies on *“...what will or will not be permitted and where”* (paragraph 154). Only those policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Any additional Development Plan Documents (DPDs) should only be used where clearly justified (paragraph 153).
- 2.6 The NPPF (paragraph 156) requires strategic priorities for the area covered by the Local Plan to deliver the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; and the provision of health, security, community and cultural infrastructure and other local facilities; etc. Crucially the NPPF (paragraph 157) indicates that Local Plans should, amongst other key requirements plan positively for the development and infrastructure required in the area; be drawn up over an appropriate time scale (preferably 15 years; indicate broad locations for strategic development on a key diagram and land-use designations on a Proposals Map; allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate; and identify land where development would be inappropriate, for instance because of its environmental or historic significance.
- 2.7 In terms of the evidence-based approach to planning, the Framework states LPAs should ensure that the Local Plan is based on *“...adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area”* (paragraph 158). Furthermore the assessment of, and strategies for

housing, employment and other uses should be integrated, and take full account of relevant market and economic signals. LPAs should use this evidence base to assess the needs for land or floorspace for economic development, including for retail and leisure development; examine the role and function of town centres and the relationship between them; assess the capacity of existing centres to accommodate new town centre development; and identify locations of deprivation which may benefit from planned remedial action. The NPPF is clear that pursuing sustainable development requires "...careful attention to viability and costs in plan-making and decision-taking" (paragraph 173).

2.8 The Framework (paragraphs 18-149) sets out thirteen key 'principles' for delivering sustainable development, including building a strong, competitive economy; ensuring the vitality of town centres; promoting sustainable transport; delivering a wide choice of high quality homes; requiring good design; promoting healthy communities; protecting Green Belt land; and conserving and enhancing the natural and historic environment. In terms of **'ensuring the vitality of town centres'** the NPPF (paragraph 23) states that planning policies should be positive and promote competitive town centre¹ environments, as well as setting out policies for the management and growth of centres over the plan period. When drawing up Local Plans, LPAs should amongst other considerations:

- recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;
- define a network and hierarchy of centres that is resilient to anticipated future economic changes;
- define the extent of town centres and primary shopping areas², based on a clear definition of primary and secondary frontages³ in designated centres, and set policies that make clear which uses will be permitted in such locations;
- promote competitive town centres;
- retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive;
- allocate a range of suitable sites to meet the scale and type of retail and leisure development needed in town centres;
- ensure that the needs for retail and leisure are "met in full" and "not compromised by limited site availability". Assessments should therefore be undertaken of the need to expand town centres to ensure a sufficient supply of suitable sites;
- allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs in other accessible locations that are well connected to the town centre;
- set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;
- recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and
- where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.

¹ The NPPF (Annex 2) states that references to town centres or centres apply to city centres, town centres, district centres and local centres, but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

² Primary shopping area is defined by the NPPF (Annex 2) as the defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

³ The NPPF (Annex 2) states that 'primary frontages' are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. 'Secondary frontages' provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.

- 2.9 When assessing and determining applications for main town centre uses⁴ that are not in an existing centre and not in accordance with an up-to-date Local Plan, the Framework requires that LPAs should:
- Apply a sequential test⁵, which requires applications for main town centre uses to be located in town centres first, then in edge-of-centre locations and only consider out-of-centre locations if suitable sequentially more preferable sites are not available. When considering edge and out of centre proposals, "...preference should be given to accessible sites that are well connected to the town centre" (paragraph 24). Applicants and LPAs should demonstrate flexibility on issues such as format and scale.
 - Require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500 sqm). The NPPF (paragraph 26) states that this should include assessment of the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made. For major schemes where the full impact will not be realised in five years, "...the impact should also be assessed up to ten years from the time the application is made".
- 2.10 The NPPF (paragraph 27) states that "...where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused".

National Planning Practice Guidance (PPG)

- 2.11 This study also draws on advice set out in the *National Planning Practice Guidance* (PPG), published in March 2014. The PPG has streamlined and replaced the advice previously set out in the *PPS4 Practice Guidance on Need, Impact and the Sequential Approach*.
- 2.12 The revised PPG still places significant weight on the development of positive plan-led visions and strategies for town centres, and thus retains the key sequential and 'impact tests'. Of relevance to this study the PPG (para 003) states that the assessment of the potential for centres to accommodate new development and different types of development should cover a "three-five year period" but should "also take the lifetime of the Local Plan into account and be regularly reviewed"

Local Planning Policy Context

Introduction

- 2.13 The current Development Plan consists of the following documents:
- **Core Strategy (2013):** This is the principle spatial plan for the Council area. It sets out the Council's strategic policies and vision for the Council area in 2026 as well as setting the framework for detailed policies and Neighbourhood Plans.
 - **Milton Keynes Local Plan (2005):** The Local Plan was adopted in 2005, and a number of policies were saved in December 2008. Given that it is now some 12 years since the Local Plan was adopted, our review of relevant DPDs necessarily focusses on the more recent documents.
 - **Waste Development Plan Document (DPD) (2008):** The Waste DPD replaced the Waste Local Plan (adopted in 1997). It provides the basis for waste planning decisions made by Milton Keynes Council.

⁴ NPPF (Annex 2) defines 'main town centre uses' as retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

⁵ This sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.

- On 1 July 2017, the Council formally adopted the **Milton Keynes Minerals Local Plan**. The policies and proposals in the new Plan replace the policies in the Milton Keynes Minerals Local Plan (2006).

2.14 A Site Allocation Plan to boost the supply of housing land within the city is currently (in January 2018) at examination and if adopted by the Council will form part of the Development Plan. Additionally, Milton Keynes Council is currently preparing a **new Local Plan for the Council area - Plan: MK**. Once adopted, it will replace all of the existing policies in the Core Strategy (2013) and the Milton Keynes Local Plan (2005). It will cover the period up to 2031. The latest drafts of the Plan: MK is the **Proposed Submission Plan: MK October 2017**, the consultation on which took place between 8 November and 20 December 2017. The document is to be submitted to the Secretary of State in Spring 2018, with the adoption aimed to take place by the end of 2018. This document has been informed by reviews of both the Core Strategy and Local Plan policies.

2.15 The Development Plan also contains a number of made Neighbourhood Plans (12, as at November 2017), which provide detailed policies for the local areas they cover and complement the strategic policies in the Development Plan. The areas covered by Neighbourhood Plans are listed below:

- **Castlethorpe (2017):** The plan was approved by full Council on 18 October 2017. The plan seeks to define how Castlethorpe will look over the next 15 years in terms of development, building design, important buildings to be protected and local green spaces.
- **Central Milton Keynes (Business Neighbourhood Plan) (2015):** The plan has been prepared by an alliance of Central Milton Keynes Town Council and local business leaders. Not only does it celebrate CMK's distinctive design and heritage, but it highlights that there are almost 50 hectares of land yet to be developed within CMK.
- **Woburn Sands (2014):** The plan was approved by the full Council on 16 July 2014. The plan seeks to retain and enhance the character and identity of the town, as well as making it an attractive and sustainable location with meets the aspirations of residents.
- **Lakes Estate (2015):** The plan became part of the Development Plan on 21 October 2015. It seeks to develop and enhance the environment, and encourage housing growth to enable it to thrive as a sustainable and unified community.
- **Wolverton Town Centre (2015):** The plan was approved by the full Council on 16 September 2015. It seeks to ensure that Wolverton's centre is a vibrant, attractive and distinctive neighbourhood with a variety of retail, commercial, cultural, and leisure uses that reflect the town's heritage and diverse population.
- **Great Linford North (2016) & Great Linford South (2016):** These plans were made by the full Council on 23 March 2016. The vision for these plans is for a proud community, fully engaged in local matters, living in a great area that is well maintained, having high quality facilities and services that meet its needs.
- **Newport Pagnell (2016):** The plan was made part of the Development Plan on 8 June 2016. The plan seeks to keep and enhance the vibrancy of the Town Centre, as well as expand leisure and sporting facilities in the town.
- **Walton (2017):** The plan was made part of the Development Plan on 11 January 2017. The plan seeks to make Walton an attractive place to live and work, close to CMK and University, supporting Milton Keynes' character, identity and cultural life.
- **Olney (2017):** The plan was approved by full Council on 19 July 2017. The plan seeks to maintain Olney as a thriving, dynamic and historic town, preserving where necessary, and improving where possible. To manage change in order to maximise the advantages and minimise the problems.
- **Sherington (2017):** The plan was approved by full Council on 18 October 2017. The plan seeks to maintain Sherington's special rural character, whilst enriching it through thoughtful new development of housing, business and social amenities, thus securing the future of the village as a vibrant, sustainable rural community.

- **Woughton (2017):** The plan was approved by full Council on 22 November 2017. The plan seeks to improve the quality of housing stock, enhance green infrastructure, tackle long term unemployment, improve health, maintain the 'classic MK' appearance, improve the quality and range of facilities and promote sustainable transport. There are also a number of emerging Neighbourhood Plans, which are in various stages of progression. These are referred to throughout this report, where appropriate.
- 2.16 There are a number of Supplementary Planning Documents (SPDs) which provide more detailed guidance to explain policies and proposals set out in Development Plan Documents. A number of these are site specific, whilst others cover more general issues. None of the documents are of particular relevance to this Study.
- 2.17 There are numerous evidence base documents, which support the Development Plan, which are relevant to this study. These include:
- Strategic Housing Market Assessment 2016-2031 (2017)
 - Strategic Housing Land Availability Assessment (2017)
 - Five Year Housing Land Supply Report (2017)
 - Local Economic Assessment (2016)
 - Retail Capacity and Leisure Study (2010)
 - Retail Capacity Update (2011)
- 2.18 A high level review of the local planning policy documents follows below.

Housing

- 2.19 The NPPF requires Local Planning Authorities to “ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area” and “identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which meets household and population projections, taking account of migration and demographic change” (paragraphs 47 and 159).
- 2.20 The Strategic Housing Market Assessment (SHMA) (2017) is a technical study intended to assist the Council in assessing the needs for market and affordable housing across the Council area and the market area. This document replaces the draft version of the Council’s SHMA published in 2016 and the Council’s previous 2013 SHMA. The SHMA identifies the Full Objectively Assessed Need for Housing in Milton Keynes to be around 26,500 dwellings over the 15-year period 2016-31, equivalent to an average of 1,766 dwellings per year. The housing mix analysis identified a need to provide additional affordable homes for 8,094 (8,200 dwellings) over the 15-year Plan period 2016-31. This is an average of 547 dwellings per year.
- 2.21 **Proposed Submission Plan: MK October 2017** via its Policy DS2 sets the need to deliver 26,500 new homes over the period 2016 to 2031, and meet its objectively assessed housing need. (OAN). Policy DS2 ‘Housing Strategy’ of the plan refreshes Policy CS2 ‘Housing Land Supply’ of the Core Strategy (2013). However, to ensure that Plan:MK is positively prepared and effective in meeting the needs of the Borough over the plan period (upto 2031), the plan allocates sufficient land for approximately 29,000 dwellings, thus providing a land supply buffer above the OAN of approximately 9.7% (i.e. around additional 3,500 dwellings). Additionally land east of the M1 motorway, south of Newport Pagnell is identified as a strategic reserve site for housing and employment development after 2031. However, if the Council’s bid for Government funding to provide infrastructure necessary for the development of this site is successful or alternative funding secured, the development of this site will be permitted to occur before 2031.

Table 2.1: Housing Supply to be brought forward through proposed submission version of Plan:MK (October 2017).

Overall Housing Target: 26,500 dwellings from 2016-2031		
Existing Housing Commitments as of April 2017 - 21,850 dwellings		
Housing to be brought forward through Plan:MK		
Housing Location	Number of Units	Related Policies
CMK including Campbell Park residential area	1,900	Policy relate to policy SD3 for Central Milton Keynes. Policy proposes 1900 additional new homes, 150,000-200,000 sq.m of office floorspace, up to 40,000 sq.m of comparison retail floorspace and additional hotel and food and drink floorspace (subject to the recommendations of this retail study) Additionally, the site requirements of existing and potential further and higher educational institutions, which may include an element of student accommodation.
Brownfield development, infill & redevelopment opportunities within the urban area	1,000	Sites identified in Strategic Housing Land Availability Assessment
South East Growth Area	3000	Relates to policy SD13 South East Milton Keynes Strategic Urban Extension, for a comprehensive residential-led mixed use development to meet the needs of Milton Keynes up to 2031 and beyond. Planning permission will not be granted for housing and associated uses until 2019/20 once the detailed alignment of the Cambridge-Milton Keynes –Oxford Expressway is known. A comprehensive development framework for the site will be prepared and approved by the Council prior to planning applications being submitted.
Windfall Allowance	1,330	Consisting of sites under 10 dwellings and based on delivery of 95 dwellings per annum (60 dwelling in the urban area and 35 dwellings in the rural area)
Sub Total	7230	
TOTAL allocated by the Proposed Submission Plan: MK October 2017	29,080	
Delivery post 2031: East of M1 (Land north of Junction 14		Land identified as a strategic reserve site for housing I and employment development after 2031. However, if funding can be secured for the provision and early delivery of highway infrastructure, the development of this site will be allowed to proceed before 2031.

2.22 **Policy DS1 ‘Settlement Hierarchy’** in the proposed submission version of Plan: MK sets out the settlement hierarchy and replaces **Policy CS1 ‘Milton Keynes Development Strategy: Settlement Hierarchy’** of the Core Strategy (2013). The approach to delivering new development in villages and other rural settlements now places the emphasis on neighbourhood plans. The settlement hierarchy is outlined below in **Table 2.2**.

Table 2.2: Policy DS1 ‘Settlement Hierarchy’ in proposed submission of Plan: MK Consultation (October 2017)

Designation	Location
Milton Keynes City	Main areas for development will be: Central Milton Keynes including Campbell Park residential area; Uncompleted City estates; Expansion Areas and Strategic Land Allocations; New Strategic Growth Areas including South-East Milton Keynes; Land East of the M1 (post 2031) and Land at Eaton Leys; Selective infill brownfield, regeneration and redevelopment opportunities.
Key Settlements	Newport Pagnell; Olney; Woburn Sands.
Villages and Rural Settlements	In compliance with made Neighbourhood Plans; Within defined settlement boundaries.

Source: Policy DS1 of proposed submission Plan: MK (October 2017)

Transport

- 2.23 The **Milton Keynes Future 2050 Commission ‘Making a Great City Greater’ document** states that the growth of Milton Keynes is to be influenced by the development of the East West Rail project. This is reiterated in **Policy CT1 ‘Sustainable Transport Network’** of the emerging Plan: MK. The project aims to provide a new east-west orbital route, linking between Reading, Didcot, Oxford, Bicester, Aylesbury, Milton Keynes, Bedford, Cambridge, Norwich and Ipswich.
- 2.24 Furthermore, the document explains that an upgrade of the A421 for an Oxford to Cambridge Expressway has the potential to provide improved east/west connections, by creating a high quality link between Oxford and Cambridge, via Milton Keynes and Bedford.

Retail

- 2.25 **The Retail Capacity Update (RCU) (2011)** informed the preparation of the Core Strategy. It reiterated the retail needs identified in the Milton Keynes Council Retail Capacity and Leisure Study (2010). In terms of comparison requirements, the requirements are lower than the original study. The quantitative assessment demonstrates that committed development, has outstripped expenditure growth in the period to up to 2011 and under the static retention scenario this remains the case until after 2016. Between 2011 and 2016 there remains an oversupply in floorspace, however between 2016 and 2021 the requirement goes from an oversupply of 2901 sqm to a need for 40,453 sqm gross, then from 2021 to 2026 there is an increase in the requirement of 41,563 sqm gross to the figure of 82,016 sqm. Therefore overall there is a requirement under the static retention rate for an additional 82,016 sqm gross up to 2026.
- 2.26 In terms of convenience requirements, once all the commitments have been factored in by 2016, there is a significant oversupply of convenience floorspace. This oversupply is forecast to continue throughout the remainder of the study period to 2026. Nonetheless that oversupply does decrease from 12,989sqm in 2016 to 7,543 sqm in 2021 and 3,406 sqm in 2026.
- 2.27 As with the Retail Capacity and Leisure Study (2010), the 2011 Update Study recommendations are along the lines of Strategy 1, which involves meeting most of the comparison retail needs in CMK; allow for smaller scale comparison retail needs in the town and District Centre in order to accommodate a locally derived need consistent with their role in the retail hierarchy; and not promote further convenience floorspace but to access each application on its own merit, having regard to the policy in the NPPF on ensuring the vitality of town centres.

2.28 This study will supersede the RCU, and inform the Plan: MK. A draft version of this Retail Capacity and Leisure Study was provided to the Council (October 2017). This informed the preparation of the **Proposed Submission Plan: MK October 2017**.

2.29 The Proposed Submission Plan: MK October 2017 carries over a number of relevant retail policies from the Core Strategy (2013) and the Local Plan (2005). The retail specific policies from Plan: MK are summarised in Table 2.4 below.

Table 2.4: Retail Specific Policies in submission version of Plan: MK (October 2017)

Policy Reference	Description
<p>Policy ER10 ‘Character and Function of the Shopping Hierarchy’</p>	<p>Policy states planning permission will be granted for additional retail development within the primary shopping areas of existing ‘town centres’ as defined in national policy and for other main town centres uses appropriate within town centres such as leisure and entertainment.. Also that planning permission will be granted for retail and service uses in new areas of residential development with the scale to be determined in Development Frameworks for those areas.</p> <p>Table 6.2 accompanying policy ER10 defines the retail hierarchy within the Borough.</p> <ul style="list-style-type: none"> • City Centre - The Primary Shopping Area of Central Milton Keynes • Town Centres - Bletchley, Kingston, Westcroft and Wolverton • District Centres - Newport Pagnell, Olney, Stony Stratford and Woburn Sands • Local Centres - (undefined)
<p>Policy DS4 ‘Retail and Leisure Development Strategy’</p>	<p>The Council will seek to:</p> <ul style="list-style-type: none"> • Develop the retail, leisure, entertainment and cultural offer • Develop the primary shopping area of CMK as a regional shopping centre for comparison shopping; • Promote and support town centre development; • Promote tourism and visitor economy; • Plan for the provision of new shops, services and facilities in new residential development areas. <p>Council sets place specific policies for CMK and Bletchley. Development is supported in other district and town centres in line with policies in ‘made’ Neighbourhood Plans.</p>
<p>Policy SD2 ‘Central Milton Keynes – Role and Function’</p>	<p>The retail core will continue to be focused around the Primary Shopping Area; small scale convenience retail development and Use Class A3/A4 food and drink uses will continue to be supported as part of mixed use redevelopments throughout CMK; and new leisure uses will be promoted within the retail core.</p> <p>Policy CMKAP SS2 of the Alliance Business Neighbourhood Plan states that sites in the Edge of Centre will be considered when retail development over 1,000m2 cannot be realised in the PSA. The development of Block D3 as a market hall is encouraged, along with improvements to the existing outdoor market and the introduction of a mix of leisure, cultural and community uses within the PSA.</p>
<p>Policy ER11 ‘Assessing Edge of Centre and Out of Centre Proposals’</p>	<p>Proposals for main town centre uses outside Town Centre areas will be subject to sequential testing and only permitted where:</p> <ul style="list-style-type: none"> • The proposal would not have a significant adverse impact on the vitality and viability of the town centre and on existing committed and planned public and private investment within the centre or centres in the catchment area of the proposal. • Applications for main town centre uses outside the city centre which exceed 2,500sqm (gross) floorspace will be required to undertake and provide an impact assessment. An impact assessment will be required to assess main town centre uses over 350 sq.m (gross) outside town, district and local centres The development would be readily accessible by a choice of means of transport;
<p>Policy ER12 ‘Protection of Shops, Post Offices, Banks,</p>	<p>Planning permission will be refused for changes of use involving loss of shop, post office, bank and public house unless:</p> <ul style="list-style-type: none"> • All means of retaining the use has been explored; and

and Public Houses and Community Facilities'	<ul style="list-style-type: none"> The Council is satisfied that the existing use is no longer commercially viable.
Policy ER13 'New Village Shops'.	<p>Planning permission will be granted for new shops in villages if:</p> <ul style="list-style-type: none"> Site is within the development boundary of the village and no site is available adjacent to the boundary; The shop will provide a local service; The shop will be no more than 300 sqm in size.
Policy ER14 "Non-Retail Uses in Local Centres"	<p>Planning permission will be granted for non-retail uses in Local Centres if:</p> <ul style="list-style-type: none"> At least one general convenience store will remain in the centre. The proposed use would not adversely affect the amenity of neighbouring properties or the surrounding area.
Policy ER15 'New Local Centres'. To update Policy LC1 of Local Plan (2005).	<p>Sites in the following areas are allocated in Plan: MK for the provision of new Local Centres: Brooklands (EEA); Campbell Park; Eaton Leys; Newton Leys; Strategic Land Allocation (SLA); Tattenhoe Park; Western Expansion Area (WEA). New local centres will also be required in new residential developments of 500 dwellings or more. They should be located so that the majority of all new dwellings are within 500 metres walking distance of a Local Centre.</p> <p>The Local Plan (2005) allocated the following areas for the provision of new Local Centres: Broughton; Grange Farm; Kingsmead; Monkston Park; Oxley Park; Tattenhoe Park; Campbell Park; Newton Leys; Oakgrove; Stantonbury Park Farm and Sustainable Residential Quarter in CMK. In relation to the Sustainable Residential Quarter, Block B4 is likely to be developed for further and higher education including the new University in the city centre.</p>
Policy ER16 'Car-Related Retail Uses'	<p>Proposals for car showroom, servicing and other car-related uses will be permitted only in the Town Centres of Kingston and Westcroft and in employment areas. Demonstration show rooms will be acceptable within CMK. Small-scale car servicing (but not showrooms or body shops) will be permitted in local centres in residential areas, providing: There is good access for towed vehicles and delivery of parts; The site is located to minimise 'bad neighbour' problems from noise or smell.</p>
Policy ER17 'Hotel and Visitor Accommodation'	<p>Planning permission will be granted for new hotel and other purpose-built visitor accommodation in CMK, town and district centres. The Council will also support the provision of new hotels and visitor accommodation to serve visitor attractions within the city.</p>
Policy ER18 'Tourism, Visitor and Cultural Destinations'	<p>Proposals will be supported within the city where:</p> <ul style="list-style-type: none"> The development is of a use, form and scale which does not harm the quality of the natural/built environment and; It benefit local communities or It strengthens the overall tourism offer; <p>Culture and tourism development should be located first within town centres, then on the edge of town centres, and then at other accessible out of centre locations.</p>
Policy ER19 'Non-Retail Uses on Ground Floors in Town Centres'	<p>Sets out the criteria where planning permission will be granted for non-retail uses on ground floors in town centres. The accompanying table identifies primary and secondary shopping frontages within the Borough and where restrictions on the proportion of units in non-retail uses occur.</p>

Source: Submission version of Plan: MK (October 2017)

2.30 A number of neighbourhood plans relevant to this Study have retail policies specific to their areas. Such policies are outlined in **Table 2.5** below.

Table 2.5: Retail Policies from Relevant Neighbourhood Plans

Neighbourhood Plan	Policy Reference	Description
CMK Alliance Plan	Policy CMKAP G7	This policy relates primarily to the blocklet frontages as displayed in Figure 10 of the neighbourhood plan. The ground floor blocklet frontages facing the public realm are expected to provide predominantly active frontages including offices, shops, cafés and restaurants, service providers, civic and cultural uses, and artistic installations. Furthermore, development comprising blocklet frontages should provide continuous weather protection and shelter with a depth of at least two metres at the same level as the adopted pavement. Lastly, where buildings comprised within development proposals about porte cocheres, direct and sheltered access shall be provided from them to the entrances of the proposed buildings.
Woburn Sands Neighbourhood Plan	Policy WS9	Within the town centre developments and changes of use which promote the vitality and viability of the High Street will be supported. Retail development outside of the town centre, which impinges on the health of the High Street, will not be permitted.
Wolverton Town Centre Neighbourhood Plan	Policy W4	This policy seeks to protect, enhance and promote a range of town centre uses. The over dominance of particular uses will be avoided by the retention of A1 uses within primary and secondary frontages, and ensuring non retail uses do not create a continuous frontage within a primary frontage. Furthermore, retail services in town centre will be promoted by providing protection for secondary frontages and only allowing superstores if they have no unacceptable impact on the town centre.
Stony Stratford Neighbourhood Plan	Policy 1	This policy states that ground floor uses within the primary shopping area will be predominantly A1 retail, supported by restaurants, pubs, takeaway and offices (use classes A2, A3, A4, A5 and B1). Furthermore, to maintain the function of the town centre there will be a presumption against changes of use in the primary shopping area which create a run of three non-retail A1 uses in any frontage length.
Olney Neighbourhood Plan	Policy ONP13 - Retail	Planning permission will be granted only for retail development on Site R including for a food store (Use Class A1) and possibly a petrol filling station. Planning permission will be granted only for development on Site R where it can be demonstrated that it will not have a significant adverse impact on the vitality and viability of the town centre.
Woughton Neighbourhood Plan	Policy WN3 Self-Contained grid Squares	Proposals for new commercial, business and community uses in each residential Grid Square defined by Policy WN1 will be supported, provided they are of a scale to meet the needs of each area. Subject to viability, proposals that will lead to the net loss of existing commercial, business or community uses in each residential Grid Square will not be supported unless either: <ul style="list-style-type: none"> • The facility has been or will be replaced by an equivalent facility within an adjacent grid square; or • The facility concerned is no longer viable. This policy encourages the development of new commercial, business and community uses in the residential Grid Squares to enable each of their communities to become more self-contained. However, the policy makes it clear that only proposals that are intended to meet the local needs of the Grid Square will be appropriate. The area is not considered suitable for any major retail or other development proposals that are not consistent with Policy WN1.
	Policy WN15 Grid Square Local Centres	Proposals to expand an existing Local Centre in a Grid Square, as shown on the Policies Map, to provide for new commercial, office, workspace and live/work units of a local scale, will be supported, provided that provision is made to Milton Keynes standards for off-street car parking. Proposals that require the redevelopment of an existing Local Centre will only be supported if a new Local Centre is provided in a suitable location in the same Grid Square of an equivalent size and scale. Proposals for a change of use to create a new hot food take-away or a betting shop in a primarily residential Grid Square where such a use already exists, will not be supported.

	<p>Policy WN16 Netherfield Local Centre</p>	<p>The Neighbourhood Plan defines the Local Centre in Netherfield, as shown on the Policies Map, to serve the higher order convenience shopping needs of Woughton.</p> <p>Proposals to expand the Local Centre to provide new commercial, office, workspace or live/work units will be supported, provided they are of a scale appropriate to a Local Centre and that provision is made to Milton Keynes standards for off-street car parking. Such proposals may include flatted residential accommodation on upper floors.</p> <p>Proposals that require the redevelopment of the existing Local Centre will only be supported if a new Local Centre is provided in the same broad location of at least an equal net floor area.</p>
<p>Sherington Neighbourhood Plan</p>	<p>Policy NP4: Community Hub and Facilities</p>	<p>Community facilities, as designated on the proposals map, will be supported and improved wherever possible to ensure the day-to-day needs of the village residents can be met. The existing community facilities will be protected from redevelopment for an alternative use that would erode their function and benefit to the community. Improvements to community facilities will be supported, subject to the proposal not having a significant adverse impact upon: • the character of the surrounding area; • the setting of listed buildings; • any residential amenity in terms of noise, fumes or other disturbance. Proposals for the redevelopment of the existing village store to create a community hub adjacent to the village hall on Church Road will be supported.</p>

Source: CMK Alliance Plan (2014); Woburn Sands Neighbourhood Plan (2014); Wolverton Town Centre Neighbourhood Plan (2015); and Stony Stratford Neighbourhood Plan (2015)

Shopping Frontages & Boundaries Policy Context

- 2.31 In setting out policies for the management and growth of centres over the plan period, and promoting competitive town centre environments, local planning authorities are required by the NPPF (paragraph 23) to define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations.
- 2.32 The NPPF (Annex 2) defines primary and secondary frontages as follows:
- Primary Shopping Frontages (PSFs) - likely to include a high proportion of retail uses, which may include food, drinks, clothing and household goods.
 - Secondary Shopping Frontages (SSFs) - provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.
- 2.33 The difference between the definition of the Primary Shopping Area and Town Centre Boundary is defined by NPPF (Annex 2) as follows:
- **Primary Shopping Area (PSA)** - the area where retail development is concentrated and generally comprises the PSFs and those SSFs which are “adjoining and closely related to the primary shopping frontage”.
 - **Town Centre Boundary (TCB)** – defined as the area on the local authority’s proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area.
- 2.34 The definition of a centre’s PSA and TCB is important in retail planning terms in a number of important respects:
- First, for the purposes of plan-making and development management, sites and applications for new retail, leisure and other main town centre uses that are not in an existing centre and not in accordance with an up-to-date Local Plan will be subject to the sequential and impact ‘tests’ in accordance with the NPPF (paragraphs 24-27).
 - Second, in terms of applying the sequential approach for both plan-making and decision-taking, an ‘edge-of-centre’ site is defined for retail purposes by the NPPF (Annex 2) as a location that is “well connected

and up to 300 metres of the primary shopping area”. For all other main town centre uses it is a location “within 300 metres of a town centre boundary”; and for office development, it includes “locations outside the town centre but within 500 metres of a public transport interchange”. The NPPF states that in determining whether a site falls within the definition of edge of centre, “account should be taken of local circumstances”, and preference should be given to “accessible sites that are well connected to the town centre” (NPPF, paragraph 24).

- Third, defining the extent of the PSF and PSA for town centres will also enable local planning authorities to manage Permitted Development Rights (PDR), principally from retail to residential use.

2.35 It is against this policy background and guidance that we have necessarily reviewed and identified the extent of each centre’s primary and secondary shopping frontages, PSA and Town Centre Boundaries. Our assessment has been based by our health checks and site visits of the main centres during 2017.

Frontage Policy Trends

2.36 To inform this Study we have reviewed the Development Plan Documents that have been adopted by other Local Planning Authorities in 2015 and 2016. This was done in order to understand how frontage policies are dealt with by others and to establish general trends for dealing with this matter. The following Local Plan Documents have been found particular useful as part of the exercise, reflecting a variety of types of frontage policies:

- Chorley Local Plan 2012-2026 Site Allocations and Development Management Policies Development Plan Document, adopted in July 2016.
- Tunbridge Wells Borough Site Allocations Local Plan, adopted in July 2016
- Hinckley and Bosworth Borough Council Local Plan 2006 – 2026 Site Allocations and Development Management Policies DPD, adopted in July 2016.
- North Somerset Council Development Management Policies Sites and Policies Plan Part 1, adopted in July 2016.
- Fareham Local Plan Part 2: Development Sites and Policies, adopted in June 2015.
- Rochford District Council adopted its Rochford Town Centre Area Action Plan in April 2015.
- South Ribble Borough Council adopted its Local Plan in July 2015.

2.37 As part of this review, it has been recognised that in general, recently adopted policies seek to control the combination of retail and town centre uses as defined by the Framework. The following three trends in frontage policies have been identified:

1. Minimum Use Class threshold

A minimum threshold policy can be adopted to control the composition of the shopping frontages in centres. This is where certain Use Classes, typically non-A1 uses, are not permitted if they would result in the reduction of A1 uses below a certain level. This can either be a measured proportion of a particular frontage of a certain area of the centre (i.e. the length of individual shop fronts compare to the total frontage length, or the number of units measured against the number of units in a particular frontage) or the centre as a whole.

The minimum threshold can be set to any use, which the Council desires to maintain, or a combination of uses.

Such approach is very precise in application and monitoring, but does not offer the flexibility that may be desired to adapt to changing town centre trends and consumer demands and habits. As such, the use of these types of policies is increasingly becoming less popular with Local Planning Authorities. Nevertheless, as an example the following recently adopted development plan documents contain this type of policies:

- Broadland District Council, Development Management DPD, 2015 – see Policy R1
- London Borough of Brent, Local Plan, 2016 – see policy DMP2
- Newham Council, Newham's Local Plan Detailed Sites and Policies Development Plan Document, 2016 – see policy SP10

2. Qualifying Criteria

In seeking to control the composition of the shopping frontages in their centres, it is possible to employ a number of criteria, which would need to be met before certain uses are permitted. This would typically apply to non-A1 uses or even the wider “town centre uses” as defined by the Framework. The latter is more commonly employed for Secondary Frontages, however not in all cases.

The wording of the qualifying criteria differs depending on the Local Planning Authority to reflect their local circumstance. However, below we provide examples of the themes that such policies cover:

- a. Permit proposals where they do not adversely impact either individually or cumulatively, on the function, vitality and viability of a particular type of frontage, specific area of the centre or the centre as a whole. or
- b. Permit proposals where they maintain and enhance the vitality of the particular type of frontage, specific area of the centre or the centre as a whole for example by:
 - i. Promoting evening and daytime economy;
 - ii. Providing for (independent) retailers that contribute to the overall vitality of the centre;
 - iii. Not resulting in such a concentration/ excessive concentration as to lead to a significant interruption in the shopping frontage, reducing its character/ attractiveness/ function. Some local plans defined “concentration” by stating a maximum number of adjoin units in the same Use Class;
 - iv. Retaining active shop window display;
 - v. Opening (staying open) between certain hours;
 - vi. Promoting diversity of offer/ extend the range of activities available to shoppers/ other uses as to enhance the experience of visiting the centre;
 - vii. Increasing footfall/ not resulting in the reduction of footfall;
 - viii. Not resulting in an over proliferation of any one use type;
 - ix. Maintaining the dominant shopping character;

As an example, the following recently adopted development plan documents contain these types of policies:

- Chorley Council, Local Plan 2012-2026 Site Allocations and Development Management Policies, 2016 – see Policy EP6.
- North Somerset Council, Development Management Policies Sites and Policies Plan Part 1, 2016 – see Policy DM63
- Fareham Local Plan Part 2: Development Sites and Policies, 2015 – see Policies DSP21, DSP22
- Hinckley and Bosworth Borough Council, Local Plan 2006 – 2026 Site Allocations and Development Management Policies DPD, 2016 – see Policy DM22
- Blackburn with Darwen Borough Council, Local Plan Part 2 Site Allocations and Development Management Policies, 2015 – see Policy 27
- Bristol City Council, Bristol Central Area Plan, 2015 – see Policies BCAP16, BCAP 17
- Taunton Deane Borough Council, Taunton Deane Adopted Site Allocations and Development Management Plan, 2016 – see Policy TC1

3. A mixture of the above – Hybrid

- 2.38 In seeking to control the composition of the shopping frontages, it is possible employ a combination of the above options. For example the following Local Plan documents use “hybrid” frontage policies:
- Tunbridge Wells Borough Site Allocations Local Plan , July 2016 - see Polices CR5 to CR12
 - Hackney Council, The Hackney Development Management Local Plan, 2015 – see Policy DM9
 - Hastings Borough Council, Hastings Development Management Plan, 2015 – see Policy SA1
 - South Ribble Borough Council, Local Plan, 2015 – see Policy E3
 - Rochford District Council, Rochford Town Centre Area Action Plan, 2015 - see Policy 2
- 2.39 In order to allow for more flexibly it is common for the minimum A1 Use Class threshold to be supplemented by an “exception” policy where other Use Classes are allowed subject to passing a set of criteria. It should also be noted that in such hybrid cases some policies do not set a fixed threshold, but rather encourage achieving / maintaining a certain threshold.
- 2.40 It is also possible to supplement a minimum A1 Use Class threshold with criteria based polices, where a proposal would have to pass both sets of tests before being permitted. This is considered to be a very rigid approach that allows for no flexibility.

3 RETAIL AND TOWN CENTRE TRENDS

3.1 This section summarises some of the key trends that have fuelled the changes in the retail sector over the last three decades, and the impact of these trends on the UK's Town Centres. It provides a commentary on the impact of the downturn in the economy since 2007 and the growth of internet ('multi-channel') retailing on consumer spending, retail development and retailers' business strategies. Drawing on the latest research it also describes how these trends may continue to shape changes in the future, and whether and how Town Centres can respond to help maintain and enhance their overall vitality and viability.

Retail Trends

3.2 Following an unprecedented period of growth in retail sales and expenditure since the mid-1990s, the onset of the longest and deepest economic recession in living memory in 2007/08 had a dramatic impact on consumer spending and market demand. Business and consumer confidence was further weakened by public sector cuts, the rise in VAT, increasing unemployment, less expansionary consumer credit and the rising cost of living (including higher energy costs, petrol and housing prices). This reduced disposable income and retailers' margins were squeezed further.

3.3 Official figures show that the UK recovery began in early 2013 and although GDP growth peaked at 2.9% in 2014, it slowed to around 2% in 2015 and 2016 against the backdrop of a weaker global economy and further uncertainty on financial markets. The Brexit vote and subsequent triggering of Article 50 is likely to further dampen business/consumer confidence and the prospects for new investment and growth in the near future. Indeed, over the last 12 months the UK has shifted from being one of the fastest growing G7 economies to among the slowest. Against this background of economic and political uncertainty, Experian Business Strategies project lower GDP growth of around +1.5% in 2017 and 2018.

3.4 This dampening in economic growth is also impacting on household income and spending, and ultimately retail sales. The combination of higher inflation, a decline in real wages, a rise in interest rates and a tightening of consumer credit will continue to place a drag on real incomes and consumer spending. Experian forecast that retail sales growth will average 1% in 2018 and 1.9% in 2019.

3.5 The table below shows the actual and forecast growth in retail (convenience and comparison goods) spending per head identified by Experian Business Strategies in their latest Retail Planner Briefing Note 15 ('Briefing Note') published in December 2017. This is based on their 'central forecast scenario' which assumes annual growth in GDP averaging 2% from 2016 to 2035.

Table 3.1 Forecast year-on-year growth in retail expenditure per capita

Volume Growth per head (%):	-----ACTUAL GROWTH-----										EXPERIAN FORECASTS					HISTORIC TRENDS	
	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020-24	2025-36	1997-07	1997-16	
Total Retail Spend	2	-2.8	0.7	-1.1	1.3	1.9	2.1	2.8	3.5	1.4	0.4	1.2	2.2	2.3	5.4	3.5	
Convenience	-4.2	-4.2	-0.6	-3.3	-0.2	-0.3	-0.3	-1	1	0	-0.6	-0.2	0.1	0.1	0	-0.6	
Comparison	4.4	-2.9	1.4	0.1	2.3	3.5	3.6	5.2	5	2.3	0.9	2.1	3.2	3.2	8.3	5.6	

Source: Experian Retail Planner Briefing Note 15 (December 2017); Figures 1a and 1b.

Notes: The table also shows historic growth rates for the period 1997-2007 (the pre-recession period) and for 1997-2016.

- 3.6 As the table shows, there has been negative annual growth in convenience goods expenditure per capita levels between 2008 and 2015. Although there was positive growth of +1% in 2016, the forecasts show a return to no or negative growth over the period 2017 to 2019, with limited growth of +0.1% thereafter up to 2036. The forecast growth rates compare with previous historic trends of no growth between 1997 and 2007, and negative growth of -0.5% over the long term, between 1997 and 2016.
- 3.7 For comparison goods the Experian data indicates that annual growth rates are recovering from a low of -2.9% in 2009, to a peak of +5.2% in 2015 and +5% in 2016. However, for the reasons set out above, Experian forecast a dampening in growth in the immediate post-Brexit period; to +2.3% in 2017, +0.9% in 2018 and +2.1% in 2019. Thereafter, comparison spend growth is forecast to average circa +3.2% between 2020 and 2036. Despite the growth forecast by Experian, it is clear that comparison goods growth rates are well below historic trends of +8.3% per annum for the period 1997 to 2007.
- 3.8 Any further dampening of growth rates over the medium to long term could have implications for the viability of existing retail businesses and the take-up of new space, as well the need ('capacity') for new retail floorspace over the forecast period. This needs to be taken into account when assessing and reviewing the capacity forecasts for new convenience and comparison goods floorspace set out in this report.

Special Forms of Trading and Internet Shopping

- 3.9 One of the key trends that has impacted on the retail sector and shopping patterns over the last decade has been the growth in internet shopping, which forms part of special forms of trading (SFT)⁶. Based on ONS data, Experian Business Strategies (EBS) estimate that:
- The value of internet sales in 2017 is estimated to be £55.1bn (at current prices). This represents a +31% increase from £42.1bn in 2015 and a +13% increase from £48.9bn recorded in 2016.
 - The value of other (non-internet) SFT sales (e.g. mail order, vending machines, market stalls, etc.) is estimated to be £8.8bn in 2017. This represents a more modest growth from circa £8.5bn in 2016 and £7.9bn in 2015.
 - Total non-store retail sales are therefore estimated to amount to some £63.9bn in 2017. This represents a 28% growth in sales from £50bn in 2015 a substantial increase from £17.1bn recorded in 2006.
 - The overall market share of SFT, as a proportion of total retail sales, has increased nationally from 5.4% in 2006 to 16.5% in 2017. It is forecast by Experian to grow to 19.3% by 2021 and to 22.5% by 2036 (see table below).

⁶ Special Forms of Trading (SFT) comprises all non-store retail sales made via the internet, mail order, stalls and markets, door-to-door and telephone sales. On-line sales by supermarkets, department stores and catalogue companies are also included in the data collected by the Office for National Statistics (ONS).

Table 3.2 SFT's market share of total retail sales

	2017	2021	2026	2033	2036
TOTAL:	16.5%	19.3%	20.9%	22.1%	22.5%
Comparison	19.7%	22.5%	23.4%	23.8%	24.0%
Convenience	10.8%	13.1%	15.5%	17.2%	17.8%

Source: Appendix 3 of Experian Retail Planner Briefing Note 15 (December 2017)

- 3.10 This significant growth is being sustained by new technology (such as browsing and purchasing through mobile phones) and the development of interactive TV shopping. Although Experian forecast that the pace of e-commerce growth will slow after 2020, other commentators suggest that the growth and market share could be higher.
- 3.11 However such forecasts need to be treated with caution, as according to Experian approximately 25% of all SFT sales for comparison goods and some 70% for convenience goods are still sourced through traditional ('bricks-and-mortar') retail space, rather than from 'virtual' stores and/or distribution warehouses. On this basis Experian has adjusted the SFT market shares downwards to reflect the proportion of internet sales sourced from existing stores.

Table 3.3 Revised forecast growth in SFT's market share of total retail sales

	2017	2021	2026	2033	2036
TOTAL:	10.6%	12.4%	13.6%	14.5%	14.9%
Comparison	14.8%	16.9%	17.5%	17.9%	18.0%
Convenience	3.2%	3.9%	4.6%	5.2%	5.3%

Source: Appendix 3 of Experian Retail Planner Briefing Note 15 (December 2017)

- 3.12 Notwithstanding this, there is no question that the digital revolution and growth of online ('virtual') retailing has significantly impacted on Britain's high streets and sales, as it provides local consumers with convenient and often cheaper alternatives to more traditional shops. Up to now, the impact of Internet shopping has been mainly concentrated on certain retail products and services (such as, for example, electrical goods, books, music and travel). In turn, this has resulted in a reduction in the number of retailers selling these types of products and services on the high street (examples being the rationalisation of HMV and GAME stores across the UK, and the loss of Blockbusters). However this does not mean that other comparison goods categories are immune to the impact of the internet, including clothing and footwear. This is illustrated by the survey-derived market shares for SFT and internet shopping across the defined Study Area and zones (see Section 4).
- 3.13 The impact of the digital revolution is also impacting on how and where people choose to spend their leisure time. For example, instead of visiting the cinema or theatre, consumers can digitally stream to their televisions a vast library of filmed entertainment on demand; and social media, Skype, email and instant messaging are displacing face-to-face interactions. The innovation and development of these alternative digital customer experiences is accelerating, and in the process exacerbating a 'digital divide' between, on the one hand, those well-resourced companies investing and competing in the digital arena, and on the other hand the small

independent merchants that comprise most of today's high street communities. Yet the success of firms at both ends of the 'divide' is mutually dependent, and is essential to a successful high street.

- 3.14 Notwithstanding the clear and present impact of the digital revolution on how people shop and 'play', some Town Centres should be well positioned to benefit from the growth of new retail related services and multichannel retail, particularly through the provision of convenient 'click and collect' facilities to help drive footfall; whereby customers can browse and order a product on-line, and then collect it from a local store at their convenience. According to research by NEMS Market Research⁷, 48% of online shoppers have at some point made 'click & collect' purchases (i.e. bought or ordered goods online, but then collected the goods themselves). This not only addresses the major weakness of online shopping, which is that customers may not be at home when their goods are delivered, but also offers an opportunity for the successful adaptation of traditional high street retailing. John Lewis has led the way in this field and Argos has reported that sales through its 'click & collect' service account for circa one-third of the company's total turnover. Amazon also has an agreement with the Co-operative and Morrisons to locate self-service lockers in local stores. According to research by NEMS Market Research Ltd, a wide range of retailers are rated positively in terms of having a good 'click and collect' service, but a few stand out. For example Argos was rated positively by a third of the people who have used a 'click & collect', followed by Tesco (27% rated its service as good), ASDA (15%), John Lewis (13%) and Marks & Spencer (7%). The only 'pure' online retailer that was rated highly was Amazon (7%).
- 3.15 Further to this is the potential for 'showrooms' on the high street, where customers can view and test products in-store before purchasing online. This co-ordinated multi-channel strategy should therefore help to support the vitality and viability of some Town Centres over time, and help drive the demand for retail space from non-traditional retailers.

Floorspace 'Productivity' Growth

- 3.16 Floorspace 'productivity' (or turnover 'efficiency') growth represents the ability of retailers to absorb higher than inflation increases in their costs over time (such as, for example, rents, rates, service charges and staff costs) to help maintain their profitability and viability. Practically, this is achieved by increasing the amount of sales (revenue) within a given retailer's available floorspace (measured in square feet or metres).
- 3.17 It is standard practice for retail planning assessments to make an allowance for the year-on-year growth in the average sales densities of existing and new (comparison and convenience) retail floorspace. However, there is limited evidence detailing actual changes in the turnover and profitability of retailers over time. Furthermore analysis of past data and trends is complicated by the fact that sales density increases have been affected by changes in the use of retail floorspace over the last 20 years; such as, for example, the growth in out-of-centre retailing; Sunday-trading; longer opening hours; and the very strong growth of retail expenditure relative to the growth in floorspace. Following the recession many retailers struggled to increase or even maintain sales density levels and, together with other financial problems, this resulted in some retailers going out of business.
- 3.18 The table below sets out the latest sales density growth forecasts for comparison and convenience goods floorspace published by Experian Business Strategies (EBS), based on predicted changes in retail floorspace over time and after making an allowance for 'non-store' (SFT) retailing.

⁷ Usage of Click & Collect by internet shoppers. NEMS Market Research (2016)

Table 3.4 Forecast 'productivity' growth rates

	2014	2015	2016	2017	2021	2026	2020-24	2025-36
Comparison	5.4%	5.3%	4.3%	1.3%	0.9%	1.8%	2.3%	2.2%
Convenience	-2.0%	-1.2%	0.7%	-0.1%	-0.1%	-0.2%	0.0%	0.1%

Source: Figures 4a and 4b, Experian Retail Planner Briefing Note 15 (December 2017)

- 3.19 The forecasts show that the scope for sales density growth is limited for convenience goods retailing. This is mainly due to slow growth in sales volumes and limited additions to the floorspace stock following the shelving of major foodstore expansion programmes by the leading national grocers (i.e. Tesco, Waitrose, Sainsbury's, Morrisons and Asda). Notwithstanding this, the turnover densities of existing foodstores in strong trading locations will inevitably be driven upwards where they are serving catchments that are forecast to benefit from strong population and expenditure growth over the short, medium and long term, and particularly where there is limited or no addition to the floorspace stock.
- 3.20 For comparison goods retailing, the trends towards more modern, higher density stores and the demolition of older inefficient space is forecast to continue, resulting in average growth rates of over +2.3% per annum over the next 15-20 years. However, this is still well below the rate seen during the boom of the early years of this century.
- 3.21 The floorspace 'productivity' growth rates forecast by EBS have been used to inform the retail capacity assessment set out in Section 10 of this study. It should be noted however that we consider that existing retailers and floorspace will have the potential to achieve higher annual revenue growth rates to absorb increasing costs in order to remain viable, and this is especially the case where opportunities for additional new floorspace is limited.

Changing Retailer Requirements

- 3.22 The economic downturn, the growth in internet shopping and the continued demand for out-of-centre shopping has resulted in national retailers reviewing and rapidly adapting their business strategies, requirements and store formats to keep pace with the dynamic changes in the sector and consumer demand.
- 3.23 This is probably best illustrated by the changes in the grocery sector over the last 2-3 years. Following a sustained period of growth over almost 20 years up to 2009/10, principally driven by new store openings, the focus for the main grocery operators (i.e. Tesco, Sainsbury's, Asda, Waitrose and Morrisons) has now shifted to growing market share through opening new smaller convenience store formats (such as Tesco Express, Sainsbury's Local and Little Waitrose) and online sales. Over this period applications for large store formats have slowed to a virtual standstill and in some cases permissions are not being built out⁸. At the other end of the grocery spectrum, the European-led 'deep discount' food operators (namely Aldi and Lidl) are increasing their market shares through new store openings across the UK. This will inevitably have implications for the scale and type of new floorspace required by food stores in the future.
- 3.24 In the non-food sector, those retailers that experienced significant growth up to 2007/08 have had to adapt to the very different market conditions. The retailers that have not been flexible enough to respond to changing

⁸ For example, in 2015 Tesco disposed of some 49 sites with relatively recent permissions for new foodstores, including sites in Ipswich, Basingstoke and Dartford.

consumer needs, or are being squeezed in the increasingly competitive 'middle ground' between high-end and value retailing, have largely struggled to maintain market share. In some cases, this has resulted in a series of high profile 'casualties' and a number of key retailers have either disappeared from our high streets altogether (e.g. Woolworths, TJ Hughes, Jessops and Jane Norman), or have significantly reduced their store portfolio in centres across the UK (e.g. HMV, GAME etc.). Although the number of retailer 'casualties' has slowed over the last 12-18 months, there are still a number of traditional high street retailers that have recently been forced into administration, most notably BHS.

- 3.25 Research also shows that there is an increasing polarisation and concentration of retailer demand and investment interest in the larger regional and sub-regional centres (i.e. the 'top 25-50' UK centres as defined by Javelin VenueScore rankings). This is because these centres usually have large and established catchment areas, and therefore represent less 'risky' investments in the current uncertain economic climate. These larger centres have also generally benefitted from recent new shopping centre development and investment over the last decade, and are therefore better placed than smaller and medium sized centres to accommodate retailers' requirements for modern larger format units. At the same time, retailer and investment demand is also mainly focussed on the prime retail pitches, with the secondary and tertiary pitches contracting and deteriorating in some centres due to limited demand, smaller shop units and increasing vacancies. The continuation of these trends will impact on future operator requirements, with retailers looking to satisfy their demand for larger modern premises in prime shopping locations, with strong catchment areas and a good supply of appropriate retail space.
- 3.26 Furthermore, many of the major multiples and traditional high street retailers are changing their store formats and locational requirements. For example, key anchor retailers such as Boots, Next, Mothercare, TK Maxx, John Lewis and Marks & Spencer are actively seeking larger format units to showcase their full product range and to provide an exciting shopper environment backed by the latest (digital) technology. As a result, it is the larger centres and out-of-centre retail parks that are often best placed to meet this demand; as larger units are difficult to accommodate within existing traditional high streets and Town Centres, particularly historic areas characterised by conservation areas and listed buildings. As a result, some traditional high street retailers are moving out of Town Centres to retail parks. For example, over recent years Marks & Spencer has closed a number of traditional variety stores on high streets (including in Harlow, Great Yarmouth and Rugby) and opened new M&S Simply Food stores in out-of-centre locations. M&S has also recently announced a further wave of closures for 2018/19. This further underlines the growing demand from multiple retailers for larger format shop units, and the need for Town Centres to provide a good mix of large modern units to help attract and retain high street retailers, or potentially risk their relocation to new competing shopping destinations as and when leases expire.
- 3.27 These changes in retailer requirements and market demand will continue to have a significant impact on the UK's Town Centres and high streets, particularly in those cases where retailers make the decision to relocate from Town Centres to out-of-centre locations, or even out of the area altogether.

Vacancy Levels

- 3.28 The impact of retail closures in Town Centres due to administration (beginning with Woolworths in 2008, BHS in 2016, and Jaeger in 2017) and portfolio rationalisation (such as Clinton Cards planned closure of 120 stores in 2017/18, as well closure of all Banana Republic stores in 2017) has led to a dramatic increase in national vacancy rates.
- 3.29 Experian's figures show that the national average vacancy level (expressed as a proportion of total outlets) more than doubled between 2006 and 2013; from circa 7% to 16%. Although vacancy levels have more recently have

fallen back to circa 11.2% in 2017, the national average figure 'masks' the reality for different centres and locations, for example:

- Research by the Local Data Company shows that there is a significant polarisation in vacancy levels between prime and secondary centres, and between centres in the north and south. The generally more 'healthy' centres, closer to London and the south-east have vacancy levels of less than 10%, whereas the more challenging conditions in centres such as Blackpool, Grimsby and Hull is resulting in vacancy levels of over 20%.
- Since 2012 a significant number of shopping centre and high street retail leases have expired as 25 year leases agreed in the late 1980's to early 1990's and more recent sub-10 year leases all reach maturity. In some cases/locations this has helped retailers with their portfolio rationalisation, as they adjust their store requirements for the new multi-channel environment.
- In many centres, there can be as many as 25-30% of occupied shops on temporary short-term lets, with little or no rent being paid¹⁰.

3.30 Experience shows that long-term vacancies and concentrations of vacant properties in centres can lead to a 'spiral of decline', engender feelings of neglect and lack of confidence in Town Centres, and act as a magnet for crime and antisocial behaviour. Redeveloping and bringing vacant and under-used sites and properties back into use can help stimulate vitality and economic viability, and kick-start local growth¹¹. In those cases where vacancies are long-term and units cannot be let, it will be necessary to consider alternative uses and options for redevelopment. This can include temporary uses that ensure Town Centres and frontages remain active, with the potential to accommodate business start-ups, art studios and galleries, community/youth centres, etc. Another option is 'meanwhile uses/leases', which can facilitate temporary occupation of empty buildings while a permanent solution is being found. Furthermore, local planning authorities can provide greater flexibility for changes of use in areas with high vacancy levels, particularly secondary frontages, through local plan policies, area action plans and other planning tools.

Trends in Retail-Led Investment and Development

3.31 The weak UK retail economy, the low growth in retail sales volumes, high vacancy levels and the lack of traditional development funds are all combining with other factors to create a very difficult climate for new shopping centre development and investment. One of the key impacts at the height of the economic recession was to 'weed out' some of the more expensive and unviable development schemes that were in the pipeline before the downturn in 2007/08.

3.32 The Shopping Centre Development Pipeline Report published by the British Council of Shopping Centres (BCSC) shows that the UK experienced, on average, nine new centre openings in each of the first 10 years of the 21st century. However, following the development of circa 260,000 sqm in 2009, 232,000 sqm in 2010 and 280,000 sqm in 2011, 2012 was the first year since records began in 1983 that no significant new shopping centres opened. Notwithstanding this, there are more positive recent signs of new shopping centre investment and development activity, with UK-based and international funds seeking assets (principally in prime and secondary locations) that offer the potential for growth. In terms of new development, three significant schemes opened in 2013 with a total floorspace of circa 140,000 sqm (including Trinity Leeds); the Old Market scheme in Hereford opened in 2014; and in 2015 there were a number of significant openings, including Grand Central in Birmingham as part of the New Street station redevelopment and Friars Walk in Newport. Other shopping centre

⁹ Jones Lang LaSalle, Property Predictions, 2012.

¹⁰ Sourced from Beyond Retail (2013)

¹¹ London Assembly Economy Committee: Open for Business. Empty shops on London's high streets GLA, March 2013.

schemes have opened in centres across the UK since 2015, but none are of the scale witnessed during the 'golden age' of shopping centre development between 1997/98 and 2007/08.

- 3.33 Recent trends suggest that average scheme size is generally smaller than previous schemes (i.e. less than 27,870 sqm), apart from in the larger 'top ranking' cities with the strongest catchment populations and expenditure to support new floorspace. Furthermore, recent developments and schemes in the pipeline have a significantly higher proportion of leisure uses and space than earlier shopping centre developments. For example, Land Securities recently reported that leisure space had grown four-fold in their new development schemes over the last 10 years; as illustrated by their major Trinity Leeds scheme which includes a significant leisure and catering offer. In London, the High Street Quarter scheme in Hounslow Metropolitan Centre will also include a significant food and beverage offer, anchored by a multi-screen cinema, with a reduced retail offer.
- 3.34 Even smaller schemes, such as those in Hereford and Salisbury, are providing between 5-10 restaurant (Class A3) units. Such demand is especially true in those Town Centres which have wider employment, tourist or other attractions and offer the potential for longer stay shopping. It is apparent that the trend towards more eating out and more informal restaurants and catering outlets across Town Centres is now very much part of new investment and development. This is a trend that clearly has implications for the future planning and development of the Council's main centres and the delivery of a realistic retail vision.
- 3.35 Given that it takes on average over ten years for a Town Centre scheme to be planned and developed, then it follows that it will take a number of years for centres to benefit from the economic upturn and renewed investment and development confidence. Town Centre redevelopment is complex and complicated by fragmented ownership in many centres, which acts as a barrier to site assembly and the creation of new development and infill schemes that might provide the right type of larger format retail units to attract expanding retailers. Small units and fragmented ownership are not conducive to accommodating many of today's modern retailer requirements. As a result, local planning authorities will need to take a more proactive role in attracting and/or delivering new investment and development in Town Centres. This was a key recommendation of the BCSC research 'Enabling Retail Development' (2015), which identified the following interventions by local authorities based on their case study research:
- Investor: Newport, Sheffield, Oldham, Walsall
 - Developer: Sheffield, Oldham, Bradford, Walsall
 - Masterplanner/site assembly: Ealing, Hounslow, Newport
 - Owner and management company: Woking
 - Public Realm delivery: Hemel Hempstead, Bradford
 - High Street improvements and grants: Newport, Hounslow, Bradford
- 3.36 Furthermore, the more challenging retail environment means that those shopping locations outside the 'top 25-50' centres that missed the previous (pre-recession) development cycle may face a long wait for new Town Centre development, as investors look to reduce their exposure and risks. While existing shopping centres may provide the opportunity for asset management by their owners to improve their overall attraction, offer and turnover (such as, for example, through extensions and/or increasing the food, beverage and leisure offer), it can still be problematical and prohibitively expensive to reconfigure units in the more dated early generation shopping centres. In addition, a lack of finance in recent years has severely limited investment in these centres. So, even where there is single ownership and control, activity to create the right type of units for retailers has been restricted. However it is preferable to work with existing schemes, where possible, to avoid simply moving retailers from one scheme to another and creating yet more vacant units.

3.37 Even with internet growth, additional floorspace remains one of the primary mechanisms which retailers use to grow profit and if they cannot occupy or adapt existing space, they will often look elsewhere. This means that new retail development solutions are likely to need to become more imaginative in the way in which existing properties (including listed buildings, while mindful of avoiding harm to such heritage assets) are altered in order to help prevent further diversion of trade to out-of-centre locations. Notwithstanding this, the economic rationale for new floorspace in many Town Centres is much reduced and some commentators¹² argue that the focus will increasingly be on enhancing and updating the existing Town Centre fabric.

Independents and Markets

3.38 Multiples continue to be a powerful force within the retail sector, both as marketable brands, and in their ability to secure prime locations in Town Centres. However this does not underestimate or undervalue the important role of small independent shops¹³ and street markets, which help to improve consumer choice and convenience to the communities they serve, as well as generating significant benefits for Town Centre economies in terms of local employment and income generation. Furthermore, it is widely accepted that a good mix of independent shops and market stalls help to enhance the character, diversity and vibrancy of Town Centres, preventing the growth of so-called 'clone towns'¹⁴ due to the increasing colonisation of centres by larger chain stores. The homogenisation of the high street is discussed below:

'Is the spread of clone towns and the creeping homogenisation of the high street anything more than an aesthetic blight? We think so. Yes, distinctiveness and a sense of place matter to people. Without character in our urban centres, living history and visible proof that we can in some way shape and influence our living environment we become alienated in the very places that we should feel at home.'
(New Economics Foundation, *Reimagining the High Street*, 2010)

3.39 Notwithstanding this, research shows that the number of small shops in the UK has declined in the past decade. This decline has been caused by multiple factors including changes in shopping behaviour, competition from supermarkets, internet shopping and rising costs (including rents and rates).

3.40 In terms of street markets, the 1994 Rhodes Report demonstrated its collective and economic strength. From this report the industry has been successful in demonstrating its national economic value and successive governments have started to value the role of markets as a vibrant and active part of the future of our Town Centres and the high street. This is illustrated by the NPPF (paragraph 23), which places weight on the need to 'retain and enhance existing markets and, where appropriate, re-introduce or create new ones, ensuring that markets remain attractive and competitive'.

3.41 The Portas Review¹⁵ also identified markets as an important factor in the future of successful Town Centres. This review produced 28 recommendations for reforms and whilst the success (or otherwise) of the Portas Pilots

¹² English Heritage (2013), *The Changing Face of the High Street: Decline and Revival*

¹³ There is no national definition however the Town Centres SPG defines 'small independent shops' as a shop with a gross floorspace of 80 sqm or less.

¹⁵ New Economics Foundation (NEF) *Clone Town Britain Report* (2005 and 2010)

¹⁶ The Portas Review: *An independent review into the future of our high streets* (2011)

and other interventions are still the subject of debate, recommendation No 17, a national market day, was grasped by the retail market industry. In May 2012 the first 'Love Your Local Market Fortnight' (LYLM) was rolled out as an annual national celebration of all things positive about retail markets in the UK. The Department for Communities and Local Government (DCLG) have also been very proactive in supporting the positive role of markets in the UK and Town Centre economies.

- 3.42 Retail markets therefore continue to make a meaningful and important contribution to towns and cities across the UK. The successful markets we see today are those which have embraced change and adapted alongside the town in which they trade; as the demographics of a town change a successful market will reflect this change and continue to cater for and attract the town's residents creating a vibrant and successful market. This will in turn attract visitors from outside the area and increase the value of the market¹⁶.
- 3.43 In summary, providing for the needs of modern retailers in larger format stores, principally through new retail-led developments, whilst maintaining the viability, representation and mix of independent businesses and market stalls is a difficult balancing act for local planning authorities. It will be a greater challenge going forward with the threat of internet shopping and a fragile economy in the post-Brexit age, but it is vitally important that the diversity of a centre's offer is not undermined by the new retail brands.

Impact of Out-Of-Centre Retailing

- 3.44 Alongside the dramatic growth in online shopping and sales over the last decade, it is apparent that the appetite from investors and operators for new retail and leisure floorspace in out of centre locations has not diminished.
- 3.45 Research¹⁷ shows that there has been a significant shift of institutional retail investment away from Town Centres over the last 20 years. In 1993, the proportion of investment held out of town was less than a fifth of that in Town Centres; today the value of property owned out of town has overtaken that held in Town Centres.
- 3.46 Larger format units in out-of-centre shopping parks are increasingly attractive locations for more traditional high street retailers, with the benefits of good accessibility, lower costs and ample surface car parking compared with Town Centres. Out-of-centre retailing also accounts for a significant proportion of existing and new retail floorspace and sales in the UK. For example research has highlighted the fact that of the new retail developments approved since the NPPF was published in March 2012, 72% were in out of town locations, 16% were edge of centre and just 12% were in Town Centres.
- 3.47 Although planning policies and more restrictive conditions on what goods can and cannot be sold from some retail warehouses and parks has slowed down the growth of out-of-centre retailing to a degree, the sector continues to mature and move away from 'bulky' goods¹⁸ retailing to the provision of larger stores selling fashion and homewares that compete directly with the high street. Examples include Next at Home (which now includes a significant proportion of fashion sales), John Lewis at Home and Outfit (which includes the Arcadia brands in one store, including Dorothy Perkins, Topshop, Burton, Wallis, etc.).
- 3.48 Continuation of this trend will further challenge the future vitality of many high streets as retailers choose edge and out of centre locations ahead of Town Centres. The impact of these changes will also affect centres differently depending on their function and the future growth in their catchment populations and expenditure. For

¹⁶ Recent research documents supporting the benefits of markets can be found via the following link: <http://www.nabma.com/publications/research-documents/>.

¹⁷ Property Data Report 2012, sourced from English Heritage Report (2013), The Changing Face of the High Street: Decline and Revival

¹⁸ 'Bulky' goods retailing is generally defined as comprising DIY goods, furniture and floor coverings, major household appliances and audio-visual equipment.

many towns, the simple fact is that in the future they will require a smaller, more concentrated retail core repositioned for future consumer and retailer needs, and not focused on the past. This will further reinforce the polarisation trend already being witnessed. The impact is likely to be felt across all centres to a greater or lesser extent, manifested through high vacancy rates, falling rent levels, decreasing footfall, weakening multiple retail offer and, potentially, a worsening Town Centre environment.

Summary

- 3.49 This section has illustrated that existing floorspace in Town Centres faces a myriad of challenges. These will continue to grow over the short, medium and long term. This notwithstanding, for the centres within Milton Keynes Council) to perform strongly they will need to embrace the new dynamics and build in resilience to adapt seamlessly to future changes where necessary. There is still a role for existing floorspace and physical 'store based' retailing in Town Centres.
- 3.50 There are positive signs that the UK is emerging from the shadow of the longest and deepest economic downturn in living memory, but it is clear that our Town Centres and high streets post-recession are under pressures to simply retain retail businesses, let alone attract new investment and development.
- First, although the economy in general, and retail sector in particular, is forecast to experience growth over the short to medium term at least, there are risks to these growth forecasts; not least the slowdown in global economies, an increase in interest rates and the potential fallout from Brexit and other global uncertainties arising from international politics.
 - Second, the growth of online shopping is impacting on the vitality and viability of many of Britain's centres and high streets.
 - Third, although the NPPF reinforces the longstanding policy objective of promoting development and investment in Town Centres first, the market appetite for new and extended shopping facilities in out-of-centre locations shows no signs of slowing. The lack of available, suitable and viable sites in Town Centres - and particularly historic centres - to meet the demands of modern retailers and commercial leisure operators for larger format units will inevitably result in an increase in new out-of-centre applications and/or applications to widen 'bulky goods' conditions on existing retail parks.
- 3.51 Within the Milton Keynes Council Area, there will be a need to build in resilience to the changes in shopping habits, which are likely to move away from solely being retail led locations to those which offer a wider range of retail, leisure, cultural and other amenities. This is to encourage increased dwell times and to create more purpose in frequenting centres.
- 3.52 These trends, and others, are also placing pressures on rental growth and market demand in many centres, particularly the smaller secondary centres and market towns outside the 'top 25-50' shopping locations. This has been further compounded by rising vacancy levels and the loss of key retailers. As a result, the share of non-food retail sales conducted through Town Centre shops has declined; from 64% in 2002 to just over 40% by 2013. Indeed research predicts that by 2020, the impact of declining in-store sales will result in a 31% reduction in high street stores¹⁹.
- 3.53 As a result a far more uncertain future awaits the next wave of new retail investment and development. The evidence suggests that:
- At one end of the spectrum the larger, more dominant 'top 25-50' cities and towns should strengthen their competitive position. Because of their scale and catchment populations they will continue to attract market

¹⁹ Javelin Group (October 2011), 'How Many Stores Will We Really Need?'

interest from high profile domestic and international retailers seeking space, as well as from commercial leisure operators.

- At the other end of the spectrum the smaller local and neighbourhood centres will be less affected. They are principally meeting the everyday retail (food), service and community needs of their local ('walk-in') resident catchment populations. It will therefore be important for local planning authorities to protect the important offer, role and function of these smaller centres.
- It is the medium-sized towns that occupy the middle ground that are increasingly being squeezed by the dynamic shifts in retailer demand and investment. Historically, such towns have had a reasonably large comparison shopping function, but this is beginning to shrink back because the demand from multiples is slowing and the space offered is often of the wrong size and configuration, and in the wrong location to meet today's retailer requirements. The challenge for local planning authorities will therefore be how to revitalise and regenerate these centres, looking beyond retail as a key driver for growth.

3.54 Notwithstanding these threats, industry experts still predict that the demand from major retailers for new physical space in the right locations with strong catchments will continue, as it still remains one of the primary mechanisms for retailers to 'reach' their customers, to grow their businesses and to increase market share and profitability. Over the short to medium term any increased demand for space from retailers will have to be met by the current retail stock (i.e. existing shopping centres, the high street and out-of-centre facilities). This is because there is limited new retail floorspace in the pipeline in Town Centres and, in any case, it can take a long time to deliver new development on complex Town Centres sites.

3.55 Therefore those shopping locations that are able to accommodate and deliver new developments over the next 5-10 years should be in a good position to attract operator interest. However, this will depend on the new retail floorspace being in the right location (i.e. preferably prime shopping locations, with good accessibility, etc.) and having the right size, format and specification to meet the needs of modern retailers. Due care and attention will also need to be paid to ensuring that the new floorspace and tenants complement rather than compete with the centre's existing offer, and strengthen rather than weaken the existing pedestrian circuit so as to generate the maximum benefits for the centre's overall vitality and viability.

3.56 In this context, it is clear that the 'top 25-50' prime centres and shopping locations in Britain should continue to flourish once the economy recovers. The greatest challenge facing local planning authorities will be how to revitalise the fortunes of struggling small and medium sized centres and market towns that do not have the critical mass of retail, leisure and other uses to compete for more limited investment and development.

3.57 This provides the important background and context for assessing and understanding the potential for new retail investment and development in the local authority area and centres over the short, medium and long term.

4 CATCHMENT AREA & SHOPPING PATTERNS

4.1 This section first defines the catchment/Study Area that provides the basis for the quantitative and qualitative needs assessment. It then describes the household telephone interview survey (THIS) and summarises the key headlines of the survey-derived market share analysis for convenience and comparison goods retailing.

Study Area and Zones

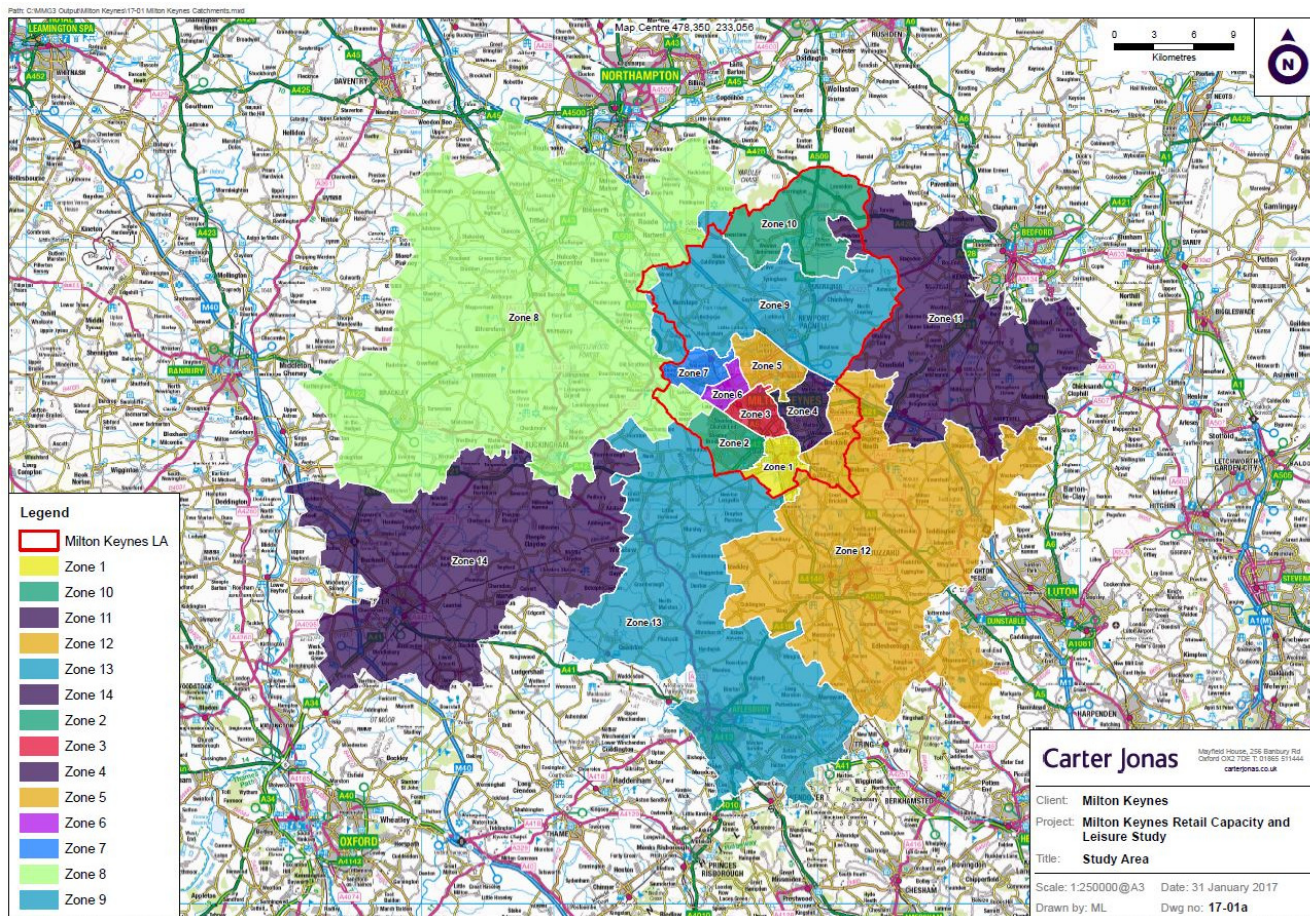
4.2 The definition of an appropriate study (catchment) area is an important starting point for any retail and town centre assessment. In this case the Study Area has been defined using postcode geography which covers the Milton Keynes Council Area in full, as well as outlying areas including parts of the surrounding local authority areas: namely, Wycombe District Council, Aylesbury Vale District Council, Dacorum District Council, South Northamptonshire District Council, Daventry District Council, Cherwell District Council, Bedford Borough Council, Central Bedfordshire Council (see Figure 4.1 below and **Appendix 1**).

4.3 The Study Area has been sub-divided into 14 zones based on postcode geography, as follows:

Table 4.1 Post Code Composition of the Study Area

Catchment	Postcode Sector
Zone 1	MK1 1; MK2 2; MK2 3; MK3 5; MK3 6
Zone 2	MK3 7; MK4 1; MK4 2; MK4 3; MK4 4; MK5 6; MK5 7; MK8 0
Zone 3	MK5 8; MK6 1; MK6 2; MK6 4; MK6 5; MK9 1; MK9 2; MK9 3
Zone 4	MK6 3; MK7 6; MK7 7; MK7 8; MK10 0; MK10 7; MK10 9
Zone 5	MK9 4; MK14 5; MK14 6; MK14 7; MK15 0; MK15 8; MK15 9
Zone 6	MK8 8; MK8 9; MK13 7; MK13 8; MK13 9
Zone 7	MK11 1; MK11 2; MK11 3; MK12 5; MK12 6; MK13 0
Zone 8	MK18 1; MK18 5; MK18 6; MK18 7; MK19 6; NN7 2; NN7 3; NN12 6; NN12 7; NN12 8; N13 5; N13 6; NN13 7
Zone 9	MK16 0; MK16 8; MK16 9; MK19 7
Zone 10	MK46 4; MK46 5
Zone 11	MK43 0; MK43 8; MK43 9; MK45 1; MK45 2; MK45 3
Zone 12	LU5 6; LU6 2; LU7 0; LU7 1; LU7 2; LU7 3; LU7 4; LU7 9; MK17 8; MK17 9; MK45 5
Zone 13	HP19 0; HP19 7; HP19 8; HP19 9; HP20 1; HP20 2; HP21 7; HP21 8; HP21 9; HP22 4; HP22 5; HP23 4; MK17 0; MK18 3
Zone 14	MK18 2; MK18 4; OX25 1; OX25 2; OX25 3; OX26 1; OX26 2; OX26 3; OX26 4; OX26 5; OX26 6; OX27 0; OX27 7; OX27 8; OX27 9

Figure 4.1 Study Area and Zones



- 4.4 These zones provide the sampling framework for the household telephone interview survey. This zone-by-zone approach also enables more detailed analysis of shopping patterns and expenditure flows both within and outside the Study Area for the purpose of the retail capacity assessment, and in accordance with good practice.

Household Telephone Interview Survey & Market Share Analysis

- 4.5 NEMS Market Research was commissioned to carry out a HTIS across the defined Study Area in March / April 2017. The questionnaire was designed by CJ in collaboration with Milton Keynes Council. The full 'weighted' survey results are set out in **Appendix 19**.
- 4.6 In total, some 1,400 interviews were conducted across 14 zones. This involved structured interviews by telephone with the person responsible for the main household shopping. A number of measures were put in place by NEMS to ensure each sample was representative of the profile of the person responsible for shopping in the household. Responses across the Study Area were further weighted by the population in each zone to ensure that the results of respondents in more sparsely or heavily populated areas were not under or over represented in terms of the market share assessment. This is a standard approach that helps to ensure the survey results provide a robust and realistic picture of shopping and leisure patterns. **Appendix 19** provides a detailed overview of the survey sample size and methodology used to ensure a representative sample of a zone's population profile.
- 4.7 The survey results help to identify broad patterns and preferences for different types of convenience and comparison goods shopping purchases, as well as leisure use across the Study Area. The key findings are

used to inform the baseline market share analysis²⁰ and turnover estimates that underpin the quantitative retail capacity assessment, as well as inform the qualitative needs assessment.

- 4.8 The Study Area is based on postcode sectors, and the study zones do not therefore necessarily align with the Milton Keynes Council area. For analytical purposes we have assumed that Zones 1 to 7, 9 and 10 broadly comprise the Council area.

Convenience Goods – Market Share Analysis

- 4.9 Convenience goods²¹ retailing is generally defined as comprising everyday essential items (including food, drinks, newspapers/magazines and confectionery), as well as an element of non-durable housing goods (such as washing up liquid, kitchen roll, bin bags, etc.). The survey-derived market share (%) analysis for all convenience goods shopping is set out in **Table 1 (Appendix 13)**. It should be noted that for this stage of the analysis the market shares for both convenience and comparison goods retailing include expenditure on Special Forms of Trading²² (including internet sales), but exclude ‘null’ responses (such as ‘don’t knows’, etc.) in accordance with good practice.
- 4.10 The overall market shares in Table 1 have been derived from the analysis of the responses as to where people normally shop for their main (‘bulk’) and ‘top up’ grocery purchases. The market shares for these different types of food shopping are set out in detail in **Tables 2-3 (Appendix 13)**.
- 4.11 In order to avoid the market share analysis of food shopping patterns being ‘skewed’ by larger superstores and foodstores in the Study Area, the survey also asked respondents where else they normally shop (if anywhere) for their ‘main’ and ‘top up’ purchases in addition to the first store identified. The market shares are set out in Table 4 for ‘top up food purchases’ and Table 5 for ‘other top up food purchases’ (**Appendix 13**).
- 4.12 The responses for ‘primary’ and ‘secondary’ food shopping purchase have then been merged through the application of a weighting based on judgements as to the proportion of household expenditure normally accounted for by each type of convenience goods shopping. Assumptions are informed by Question 9 of the household survey, which identifies the proportion of expenditure spent on main food shopping. In this case we have applied a weighting of 60% for main ‘bulk’ shopping; 15% for secondary main ‘bulk’ shopping; 15% for primary ‘top-up’ shopping; and 10% for secondary ‘top-up’ shopping.
- 4.13 The key findings of the market share analysis are briefly described below. **Table 4.3** sets out the convenience market share levels by centres and locations across the Study Area.

²⁰ It is common practice in retail assessments to deduct special forms of trading (i.e. purchases over the internet, mail order shopping and market stalls) from average expenditure per capita figures at the outset according to national forecasts derived from Experian Business Strategies. Internet shopping and special forms of trading have therefore been filtered out from the survey results before undertaking the market share assessment.

²¹ For the purpose of this retail assessment ‘convenience goods’ and ‘food’ shopping have the same meaning.

²² A more detailed explanation of SFT is set out in Section 3.

Table 4.3: Convenience goods market shares for key centres in the Council Area

Location	Study Area	Rough MKB Council Area	
			Zones 1-7, 9 and 10
Central Milton Keynes	4.5%		10.5%
Kingston District Centre	5.1%		9.9%
Westcroft District Centre	4.4%		9.8%
Bletchley District Centre	2.3%		5.3%
Wolverton District Centre	3.7%		8.7%
Town Centres	1.3%		3.5%
Local Centres	8.2%		19.5%
Out of Centre	13.3%		27.0%
TOTAL MK Area	43.6%		94.4%
SFT	4.9%		3.3%
Locations Outside MKBC	51.5%		2.3%
TOTAL	100.0%		100.0%

- 4.14 In terms of the market share of **Special Forms of Trading** (SFT), and principally internet shopping, **Table 1 (Appendix 13)** shows that the share of all food shopping across the Study Area (i.e. Zones 1-14) is 4.9%, whilst in Zones 1-7, 9 and 10 SFT account for 3.3% of all convenience purchases. SFT's share varies across the Study Area from a low of 0.8% in Zone 6 to 10.6% in Zone 9. In general terms higher SFT market shares in less built up, more rural areas normally correlate to a greater reliance on online grocery shopping, as there is less convenient access to foodstore provision compared to more urban areas.
- 4.15 Experian's latest Retail Planning Briefing Note 15 (December 2017) shows that the national average market share for non-store (SFT) convenience goods retail sales is higher than that for both the Study and Council areas at 10.8% in 2017 (see Section 3). A number of factors may influence the lower than average market share for the Study Area such as good access to foodstores and the extent/ quality of internet infrastructure. This highlights the potential for SFT market penetration to increase in the future as online grocery shopping becomes more popular and convenient. If this was to occur, then it would potentially reduce the expenditure available to support the need ('capacity') for new ('physical') retail floorspace over the forecast period to 2031 (see **Section 11**).
- 4.16 Turning to the market share analysis for the main centres and stores in the Council's area, **Table 1** shows that they are achieving an overall convenience goods market share ('retention level') of 43.6% within the Study Area. The Council area (Zones 1-7, 9 and 10), is achieving a higher retention level of 94.4%.
- 4.17 Within the broadly defined Council Area (Zones 1-7, 9 and 10) they key trends are as follows:
- CMK retains a market share of 10.5% within of Zones 1-7, 9 and 10. Morrisons at Leisure Plaza and Sainsbury's Superstore at Witan Gate, are the main foodstores.
 - Kingston, Westcroft and Wolverton District Centres retain a market share of 9.9%, 9.8% and 8.7% respectively. All the centres benefit from large format food store anchors (Tesco Extra, Morrison, and Tesco Superstore).
 - Bletchley District Centre on the other hand is retaining only 5.3%. This can be explained by the fact that the larger Asda at Denbigh North (which has a 9.4% market share) competes with the in-centre Sainsbury's (2.3%).

- The Town Centres have reasonable convenience retention rates, given their more localised role and function. Collectively they are achieving a market share of 3.5% in the broadly defined Council Area. Typically, smaller centres have much lower market shares for food shopping; reflecting their relatively limited convenience goods floorspace and the fact that they mainly serve the day-to-day more frequent top-up food shopping needs of their local resident catchment populations.
- The Local Centres collectively achieve a market share of 19.5%, which reflects their important role and function in meeting the day-to-day needs of the local catchment population. Of this total retention level the Aldi in Bradwell Common has a market share of 4.6%. We note that the majority of grid squares on the MKC area has a local centre designation. This is discussed further in Section 15.
- The Council area's out-of-centre foodstores account for the balance of convenience expenditure retained in the Council area (drawing 27.0% of convenience expenditure). Asda at Denbigh North (9.4%), Waitrose at Babbage Gate Oakgrove (7.3%), and Tesco at Watling Street, Bletchley (5.5%) are the most popular out of centre foodstores; accounting for almost 22.3% of expenditure in Zones 1-7, 9 and 10.

4.18 In summary the most popular convenience stores in the Council Area are

- Asda at Denbigh North (9.4%),
- Tesco Extra, Winchester Circle (9.1%),
- Morrisons in Westcroft District Centre (7.4%),
- Waitrose, Babbage Gate, Oakgrove (7.3%), and
- Tesco Superstore in Wolverton District Centre (6.8%).

4.19 The survey results indicate that, with the Council Area, the 'leakage' to online sales and other competing stores outside of the Council area is relatively low, with 3.3% and 2.3% respectively. This is very positive.

Comparison Goods – Market Share Analysis

4.20 Comparison goods²³ are generally defined as items not obtained on a frequent basis and include clothing, footwear, household and recreational goods (see **Glossary of Terms**). The household survey comprised questions on the main groupings of non-food expenditure, as defined by Experian in the latest Retail Planner Briefing Note, including: 'clothing and footwear'; recording media; electrical goods; books; furniture and carpets; DIY and garden products; medical goods; etc.

4.21 **Table 1 (Appendix 14)** shows the market shares (%) for all comparison goods shopping purchases made both within and outside the Study Area. These total market shares have been informed by the shopping patterns for the different types of comparison goods expenditure set out in Tables 2-12 (**Appendix 14**). The market share analysis (%) takes account of the distribution and weight of spend (£) by households on the different comparison goods categories. This ensures that the resultant shares are not 'skewed' by any particular comparison goods expenditure category. This is a standard approach for retail assessments.

4.22 The market shares include expenditure on Special Forms of Trading (SFT) but exclude all 'null' responses. The key findings of the market share analysis are briefly described below.

4.23 The key findings of the market share analysis are briefly described below. **Table 4.4**, is based on Table 1 (Appendix 14), and sets out the comparison market share levels by centres and locations across the Study Area.

²³ Please note that comparison goods and non-food shopping have the same meanings.

Table 4.4: Comparison goods market shares for key centres in the Council area

Location	Study Area	Rough MKBC Area
		Zones 1-7, 9 and 10
Central Milton Keynes	34.9%	50.3%
Kingston District Centre	2.3%	3.9%
Westcroft District Centre	0.7%	1.4%
Bletchley District Centre	2.8%	4.2%
Wolverton District Centre	0.5%	1.3%
Town Centers	0.8%	2.0%
Local Centres	0.4%	1.0%
Out of Centre	9.7%	14.6%
Total MK Area	52.1%	78.7%
SFT	20.3%	19.9%
Locations Outside MKBC	27.6%	1.4%
TOTAL	100.0%	100.0%

- 4.24 The table shows that the main centres and out-of-centre stores and shopping facilities in the Study Area, are achieving an overall 'retention level' of 52.1% within the total Study Area (Zones 1-14). This retention level increases to 78.7% within the broadly defined Council area (i.e. Zones 1-7, 9 and 10).
- 4.25 The survey indicates that some 50.3% of expenditure in the Council area is retained by Central Milton Keynes (CMK). Some 14.6% is taken up by the out of centre destinations in the Council area, of which around Denbigh North achieves a market share of 4.2%.
- 4.26 There is only a 1.4% "leakage" of spent from the Council Area, which reflects the strength of provision. The "leakage" from the more widely defined Study Area is higher, at 27.6%. The main leakage is to Aylesbury, Bedford, Banbury, Bicester and Northampton.
- 4.27 SFT's share of all non-food shopping across the total Study Area (i.e. Zones 1-14) is 20.3%, and 19.9% based on the Council area (Zones 1-7, 9 and 10). Market shares vary for zones within the broadly defined Council Area from 15.2% in Zone 2 to 27.2% in Zone 7. Experian's latest RPBN15 shows that the national average market share for non-store (SFT) comparison goods retail sales is 19.7% in 2017 (see **Section 3**), which is broadly comparable to both the Council and wider Study Areas.
- 4.28 The figure below shows the market shares for the Council's main centres and stores (aggregated), other centres and SFT/internet shopping for residents in the Study Area and the Council area only for different categories of comparison goods expenditure, based on the survey-derived results set out in Tables 2-12 (**Appendix 14**).

Figure 4.2: Comparison Goods market shares for the Study Area (Zones 1-14)

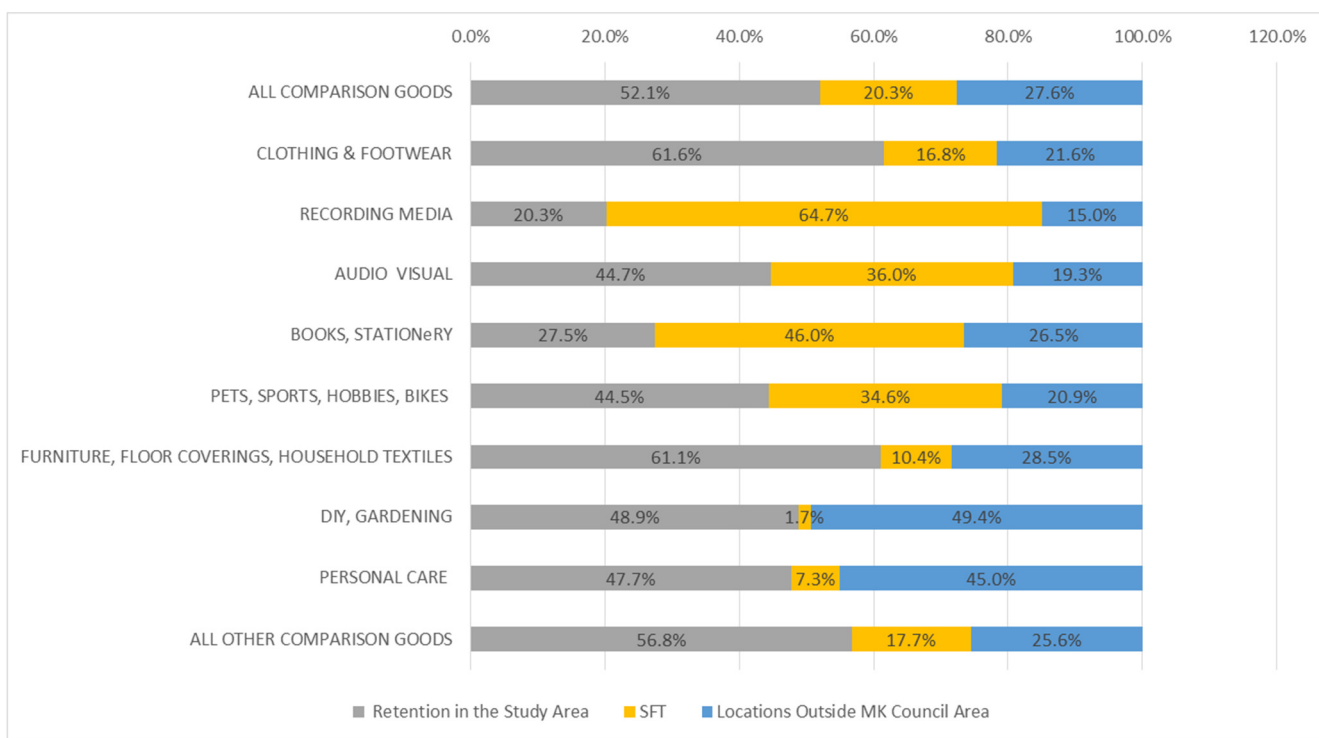
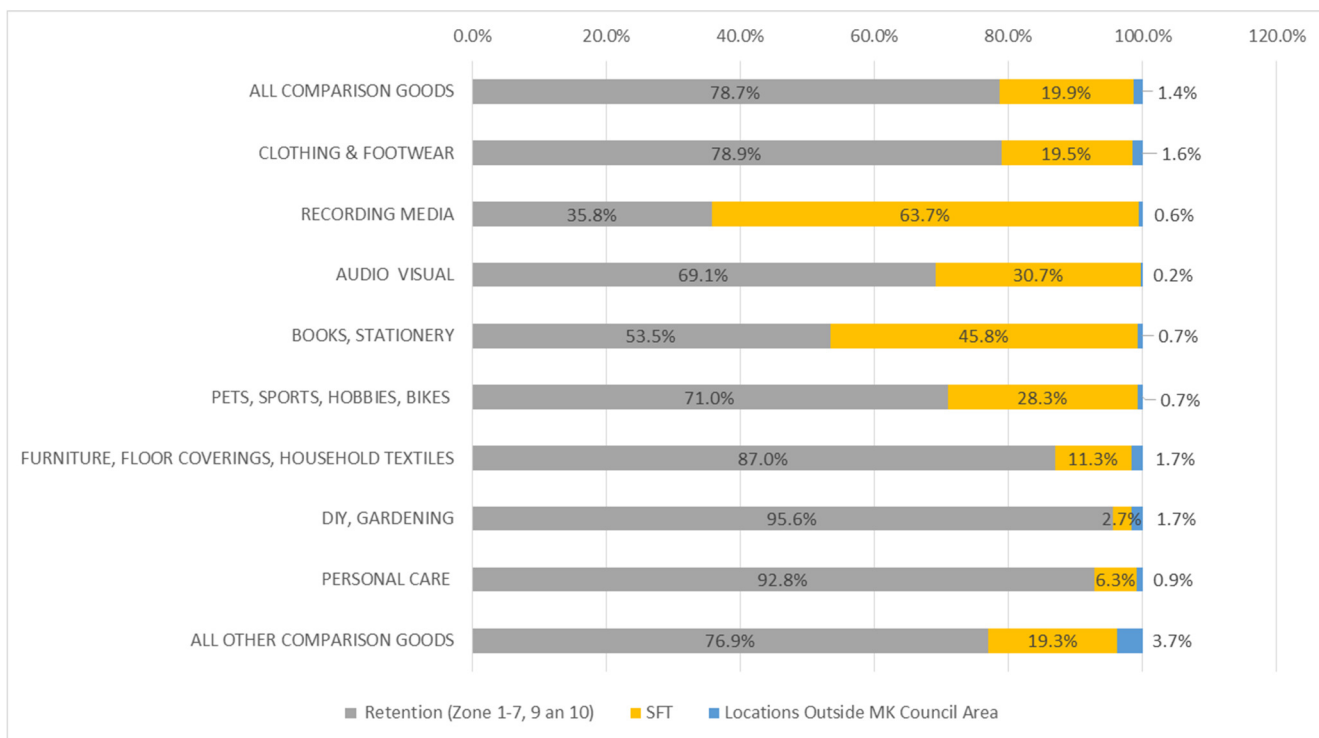


Figure 4.3: Comparison Goods market shares for the Council Area (Zones 1- 7, 9 and 10)



4.29 Across the Study Area, the highest proportion of expenditure outflow to locations outside the Council area are in the categories of “DIY, Gardening” (49.4%) and “Personal Care” (45.0%). In contrast both “Clothing and Footwear” and “Furniture, Floor Coverings, Household Textiles” have the highest expenditure retention rates

(both at 61.1%). Online shopping accounts for the highest market shares for purchases of “Recording Media” (64.7%), and “Books and Stationery” (45.0%).

- 4.30 The Council Area (Zones 1 to 7, 9 and 10) has a strong retention of expenditure for different types of comparison goods. For example, expenditure retention is the highest for ‘DIY, Gardening’ goods (95.6%) and ‘Personal Care’ (92.8%). In contrast, retention is the lowest for recording media goods; which is largely due to the fact that 63.7% of purchases are via the internet (SFT). Internet shopping also acts as the main competitor for “Books and Stationery” retailers, with almost half (45.8%) of expenditure being spent online.

5 TOWN CENTRE HEALTH CHECKS: METHODOLOGY

- 5.1 Health checks are recognised as important planning ‘tools’ for appraising and monitoring the changes in the overall vitality and viability of town centres, and informing both plan-making and decision-taking at the local level
- 5.2 In this context, **Sections 6-14** provide detailed health check assessments for the Council’s main centres, namely:
- Central Milton Keynes (CMK) Regional Shopping Centre
 - Kingston District Centre
 - Westcroft District Centre
 - Bletchley District Centre
 - Wolverton District Centre
 - Newport Pagnell Town Centre
 - Olney Town Centre
 - Stony Stratford Town Centre
 - Woburn Sands Town Centre
- 5.3 **Section 15** also provides a more high level assessment of the relative health of some of the smaller Local Centres in the Council Area, and their role and function in the network and hierarchy of centres.
- 5.4 In accordance with the PPG (paragraph 005), there are a number of Key Performance Indicators (KPIs) that are widely used (where the information exists) to help assess and monitor the overall health and performance of centres. Some of the KPIs include:
- the scale and diversity of uses (e.g. retail and services offer);
 - retailer representation and demand;
 - commercial property indicators (such as Prime Zone A Rents);
 - changes in vacancy levels;
 - accessibility and parking provision;
 - the quality of the town centre environment;
 - pedestrian footfall; and
 - customers views and behaviour.
- 5.5 In this case the most reliable KPIs have been gathered (where possible) for the centres to help inform the assessment of their overall strengths and weaknesses in in terms of their retail and leisure provision, the opportunities for new sustainable development and growth, and any potential current and future threats to their overall vitality and viability. We have referred to a number of datasets and research to help assess the relative vitality and viability of the Council’s main town centres, as referenced throughout the report. The general methodology is set out below.

Engagement of Key Stakeholders

- 5.6 As part of undertaking the town centre health checks, we have been asked by the Council to contact a number of key stakeholders. The engagement exercise was undertaken by both email and/or telephone calls. Carter

Jonas made best efforts to contact all organisations/ representatives on the Council’s list, and the table below identifies the key stakeholders consulted.

Table 6.1 Stakeholders Consulted

CMK Town Council	CMK Theatre District (Otium Real Estate)
Milton Keynes Chamber of Commerce	Covers Milton Keynes, Newport Pagnell, Woburn Sands and Olney
Federation of Small Businesses	Bletchley Town Council
Bidwells (Estate Agency)	Kingston District Centre Manager
Milton Keynes City Centre Management and BID	Kents Hill & Monkston Parish Council
Milton Keynes Development Partnership	Shenley Brook End Parish Council
Intu / their representative	Wolverton town centre/ Bletchley and Fenny Stratford Business Associations
Hermes / their representative	Stony Stratford Business Association
Woburn Sands Community market organisers	Stony Stratford Town Council
Central Milton Keynes Open market organisers	Olney Town Council
Newport Pagnell Farmers Market organisers	Woburn Sands Town Council
Olney Farmers market organisers	Wolverton & Greenleys Town Council
Planning Officers at Milton Keynes Council	

Retail Composition & Diversity of Uses

- 5.7 The health check assessments have been informed by analysis of Experian Goad Category reports for each town centre, where available. These reports set out the number and proportion of units by category across the centres. Where Experian Goad reports are not available, we have relied on their own observations of the respective centres.
- 5.8 The Experian Goad reports, detailing the different categories of goods sold in each centre (i.e. convenience, comparison, service uses, and vacant units), allow for comparisons to be made to the UK national average. It should be noted that ‘services’ as defined by Experian Goad are sub-divided into the following three sub-categories.
- **Retail services** - including hairdressers, beauty salons, travel agents, launderettes, opticians, etc.;
 - **Leisure services** - which comprise cafes and restaurants (Class A3), betting shops (sui generis), fast food/ takeaway outlets (Class A5); and
 - **Financial and professional services** - covering all Class A2 uses (such as banks, estate agents, etc.).
- 5.9 The health checks provide an effective ‘gap’ analysis tool to help identify retail types and categories that are under or over represented in centres. This is based on benchmarking against Goad UK averages for all circa 1,950 centres and shopping locations covered by Experian.
- 5.10 It should be noted that in our description of each centre’s town centre boundary we have referred to the boundaries defined by the Council. However, where Experian Goad data is relied on for composition, the area surveyed by Goad is not necessarily identical to the Council identified town centre boundary. As such, it is possible that the number of units set out in our analysis may not align with the Council’s defined boundaries.

Vacancies

- 5.11 The number and scale of vacancies in a centre, and the length of time properties have been vacant, represents a key performance indicator (KPI) to help assess a centre's overall vitality and viability. For example, high vacancy levels, or a concentration of vacancies in certain areas/ streets, could point to underlying weaknesses in terms of retailer demand and/ or the fact that the vacant units are not meeting demand and are not 'fit-for-purpose'. Notwithstanding this, vacancies can arise in even the strongest centres due to the natural "churn" in businesses opening and closing at any point in time, or due to new development and regeneration initiatives. This KPI must therefore be used and interpreted with care.

Multiple and Independent Retailers

- 5.12 A multiple is defined by Experian Goad as being part of a network of nine or more outlets. It is widely accepted that a good presence and mix of multiples in a town centre, alongside a strong independent offer, helps to increase the overall attraction and performance of shopping centres. Multiples are a strong draw for customers and they help to generate frequent shopping trips and footfall, and linked expenditure for other shops, businesses and services.

Markets

- 5.13 Whether or not a centre has a market, and the quality and offer of a market, can give an indication as to whether a centre is vital and viable. Information regarding the health of the markets discussed in this report is obtained from our own research and observations of the centres, as well as stakeholder consultation.

Retailer Demand & Requirements

- 5.14 Retailer demand and requirements have been gathered using the Requirement List and CoStar Town Focus Reports.

Prime Zone A Rents

- 5.15 The evidence on changes in Prime Zone A (ZA) rents has been obtained from a number of sources. The values for CMK have been derived from PROMIS, which collects commercial data from property agents for key UK centres. The values for other centres are provided by Carter Jonas agents. The applicability and robustness of the different data is discussed separately for the individual town centres in the respective sections of this report.

Household Survey

- 5.16 As described in Section 4, NEMS Market Research was commissioned to carry out a household telephone interview survey (HTIS) across the defined Study Area and zones in March / April 2017. The survey included questions on customer views and perceptions for Milton Keynes City Centre, Bletchley District Centre, Kingston District Centre, and Wolverton District Centre. The full 'weighted' survey results are set out in **Appendix 19**.
- 5.17 We have analysed the survey results to help understand and gauge customers' views and perceptions of the centres as places to shop and visit for a range of leisure uses and other activities.

Environmental Quality

- 5.18 Environmental quality represents a key performance indicator (KPI) to help assess a centre's overall vitality and viability. An assessment of environmental quality including cleanliness and attractiveness, security, treatment of buildings and open spaces, is undertaken using our own research and observations of the centres, as well as feedback from stakeholder consultation.

Accessibility

- 5.19 A centre's vitality and viability can also be understood through an assessment of accessibility. This is undertaken through our own research, using observations of how easy a centre is to reach; mobility time and cost; public transportation; traffic management and signage; barriers; car parking; and access by other modes. Where possible we have also drawn on stakeholder feedback to help inform our assessment.

Out of Centre Provision

- 5.20 Our assessment of current out-of-centre provision in the Council Area has been derived from a number of source, including Completely Retail, the household survey results and other data sources

New Investment & Potential Development

- 5.21 Carter Jonas has relied on the Council to identify new planned investment and committed investment within the Council Area, along with other major proposals that are in the pipeline. This has also been supplemented by consultation of key stakeholders, as well as a review of relevant planning history.

6 CENTRAL MILTON KEYNES – HEALTH CHECK ASSESSMENT

Context

- 6.1 Central Milton Keynes (CMK) is characterised by a grid layout. It is defined as the area between the West Coast main railway line and the Grand Union Canal, and between Portway (H5) and Childs Way (H6) (see Core Strategy Policy CS7). CMK is the main location in the city for retail, office and leisure development, with the largest concentration of jobs, and has a growing residential population.
- 6.2 CMK sits at the top of the settlement hierarchy with a “city” status (see Core Strategy Policy CS1); and Core Strategy Policy CS4 designates CMK, specifically its Primary Shopping Area, as a Regional Shopping Centre. The Core Strategy however notes that CMK serves both as a regional centre (for example, for shopping and transport) and as a local centre (meeting day-to-day shopping needs) for the immediate catchment population. Indeed, when the 1967 CMK Masterplan was prepared to develop the new city, CMK was designed to fulfil four roles simultaneously, as a:
- Local Centre – Providing facilities to serve the residents of CMK, within easy walking distance of their home, such as local shops, local services, a local health centre, pubs and places to eat.
 - District Centre - Supporting activities such as major supermarket shopping, recreation facilities such as swimming pools and sports halls, places of worship, large health centres, garages and petrol filling stations, and larger restaurants.
 - City Centre - Central place for city-scale institutions, major social and civic gatherings, and for the highest possible level of shopping which would meet the needs of people from all over MK and its hinterland. It is the place for the town hall, major civic institutions such as the Library, the city church Christ the Cornerstone, the main railway station, law courts, major government offices, the Milton Keynes Theatre and Gallery, and the central park (Campbell Park).
 - Sub-regional / Regional Centre - Milton Keynes to accommodate strategic growth. The CMK Alliance Plan 2026, A Business Neighbourhood Development Plan for Central Milton Keynes (October 2014) seeks that by 2026, CMK will be the dynamic centre of one of the fastest-growing regions in the South-East.
- 6.3 In Central Milton Keynes the Primary Shopping Area is defined in the Core Strategy as the area between Saxon Gate, Marlborough Gate, Avebury Boulevard and Silbury Boulevard. The CMK Alliance Plan 2026 also defines the “Edge of Centre Shopping Area” so as to replace the NPPF definition (see Policy CMKAP SS2).
- 6.4 The PSA is primarily made up of the following elements:
- Centre: MK and Intu Milton Keynes combine to make one of the largest covered shopping centres in Europe. Centre: MK opened in 1979, and was extended at its western end in the early 1990s, where Marks and Spencer is today; at the eastern end the Centre: MK is anchored by John Lewis. House of Fraser anchors the shopping centre at the western end. Centre: MK is the larger of the two centres with over 240 stores, cafes and restaurants. It is now a Grade II listed building. The Intu Milton Keynes (previously Midsummer Place) was constructed later in 2000 broadening the range of comparison shopping facilities and food and drink offer within the city centre. Intu Milton Keynes has over 50 stores, and is anchored by Debenhams.
 - Open Market located in Market Square, situated between Midsummer Boulevard and Midsummer Arcade.
 - The Theatre District hosts the Milton Keynes Theatre, The Gallery, and a number of restaurants/ café/ pub units. The owners, Otium Real Estate, are in the process of refurbishing the quarter to make it into a more family orientated destination, to include activities such as an Escape Room, an indoor soft play area, and a mini golf.

- The CMK Food centre, opened in March 1988, is now mostly vacant, albeit in the past it accommodated a large Sainsbury's foodstore, and a Waitrose. Its main occupier now is Iceland. This site hence now forms a primary opportunity for redevelopment.
- The Point was the UK's first multiplex 10 screen cinema when it opened in 1985, however over the years it has become rundown. As a result, outline planning permission for its redevelopment was granted in February 2015 (13/01729/OUT) to provide a range of retail (use classes A1, A2, A3, A4 and A5) and leisure (use class D2) uses and incorporating a maximum of 20,600 sqm. (Gross Internal Area) floorspace. This site hence now forms a primary opportunity for redevelopment.

6.5 Outside the PSA, the city centre elements include the following:

- The Milton Keynes Central railway station.
- Xscape, which is a ski, leisure, cinema, casino and entertainment centre. The leisure offer is also supplemented by a number of retail units.
- The Hub is a restaurant, café, hotel, retail and business quarter occupied by a range of leisure occupiers. A large Sainsbury's foodstore is located to the south of the Hub.
- The Place Retail Park, located to the north of the railway station and hosting retail warehouse operators such as Currys PC World, Brantano Footwear, and American Golf.
- Milton Keynes Leisure Plaza is located to the south of the railway station. It hosts the MK Ice Rink, Morrisons foodstore, ToysRus, and Argos.
- A number of financial and business premises, including civic offices, Divisional Police Headquarters, the library and so on.
- Campbell Park is located at the eastern end of CMK.

6.6 Milton Keynes is ranked 34th in the 2016 Javelin Venuescore ranking of all town and shopping centres. Northampton, Luton and Bedford are the main competing centres located outside of Milton Keynes.

Retail Composition & Diversity of Uses

6.7 **Table 6.1** summarises the composition of the centre's retail mix and diversity of uses; and **Table 3 of Appendix 2** sets out the floorspace composition. It should be noted that the composition is based on the latest Experian Goad Category Report 2016, which covers the PSA and the some adjacent blocks. The Plans showing the extent of the Goad coverage is shown in **Figure 1 of Appendix 2**.

Table 6.1: Current Retail and Service Offer – Units

Category	Number of Outlets	% of Total Outlets	UK (%)	Index
Comparison	177	41.5%	31.6%	132
Convenience	21	4.9%	8.7%	57
Retail Service	40	9.4%	14.2%	66
Leisure Service	115	27.0%	23.6%	114
Financial & Business Service	25	5.9%	10.5%	56
Vacant	46	10.8%	11.2%	96
Other Retail	2	0.5%	0.1%	391
TOTAL	426	100.0%	100%	

Source: Experian Goad Category Report (2016). Figures may not sum due to rounding.

Convenience

- 6.8 There are 21 convenience units in the survey area according to the latest 2016 Experian Goad Category Report. This represents 4.9% of total outlets, which is below the national average of 8.70%. The current floorspace provision (7.6%) is also below the national average (15.2%). The Experian Goad figures therefore point to an under-provision of food and convenience retailing in the surveyed area. However, the wider CMK area hosts additional convenience retailers: CMK hosts large Sainsbury's and Morrisons foodstores as well as an M&S foodhall, and an Iceland, with Aldi and Lidl located out of centre built in close proximity to CMK; other smaller convenience provisions are also present, such as bakers, greengrocers, and butchers, within the Open Market.
- 6.9 Overall, we consider that CMK has a relatively good convenience provision given its principal role as a comparison goods shopping destination. Notwithstanding this, there would appear to be potential to improve the PSA's foodstore offer, if the need and demand exists.

Comparison Offer

- 6.10 According to the 2016 Goad Category Report, CMK has 177 comparison outlets. This represents 41.6% of total units and is significantly above the national average of 31.6%. The current floorspace provision represents 37.4% of total floorspace in the centre, which is also above the national average of 35.5%.
- 6.11 Across the different comparison sub-categories, the centre has a high representation of many categories including department and variety stores; footwear; jewellery, watches & silver; ladies' and men's wear and accessories; office suppliers; sports, camping & leisure Goods; toiletries and cosmetics and beauty production. This indicates that the centre is a prominent shopping location. The centre has four department stores (including John Lewis, House of Fraser, Debenhams, Marks and Spencer), and a large number of prominent fashion retailers (including Hobbs, Zara, New Look, Topshop/Topman, H&M, River Island, Pandora, etc.). It is noted that the BHS department store has shut down since the Goad survey, as the operator went into administration countrywide. We however understand that a prominent anchor fashion retailer is interested in occupying the vacant unit.
- 6.12 It is also noted that the Open Market sells a variety of comparison goods.
- 6.13 Overall we consider that CMK has a strong comparison offer.

Service Offer

- 6.14 As described in Section 5, businesses are defined by Experian Goad as including retail, professional and financial services. As **Table 6.1** shows, there are 180 service outlets in CMK. They account for 42.3% of all

units, which is marginally below the national average of 48.3%. However, the current floorspace provision (43.7%) is significantly above the national average (39.3%). The following provides a brief summary of provision in the different service categories:

- There were 40 retail services in 2016, which represented 9.4% of total outlets. This is significantly below the national average of 14.2%. This category is mostly made up of the health and beauty outlets (23) (predominantly hairdressers, nail bars and beauty salons). There are also six opticians, four travel agents, and a post office.
- In terms of financial services, there were 25 outlets in 2016, which represented 5.8% of total units and is below the national average of 10.5%. The mix of services is dominated by banks and building societies (16), and the centre also hosts employment and careers (3), and property services (5).
- There are 115 leisure service outlets in 2016. This is equivalent to 27.0% of total provision and is significantly above the national average of 23.6%. The current leisure offer is varied and provides a good choice for visitors to the Centre. For example, within the two shopping centres there is a variety of cafes and restaurants. Xscape also offers a range of leisure activities including a bowling alley (Hollywood Bowl), cinema (Cineworld), indoor skydiving, indoor ski slope (Snozone) and a 24/7 casino, alongside a range of restaurants. The Milton Keynes Theatre and the art Gallery are also popular destinations. As such CMK has a growing leisure economy that caters for residents and those that work in the City but live outside the local authority area. It is however noted that Milton Keynes could benefit from a better evening economy, such as bars, pubs, nightclubs and music venues.

6.15 Given the size and the role of the centre, we consider that the overall representation of services is appropriate. We assess the potential need for new commercial leisure uses in more detail in **Section 17** of this study.

Vacancies

6.16 As described in Section 5, the number and scale of vacancies in a centre, and the length of time properties have been vacant, represents a key performance indicator (KPI) to help assess a centre's overall vitality and viability. This KPI must therefore be used and interpreted with care.

6.17 **Table 6.1** shows the number of vacant outlets in CMK is at around 10.8%, which is consistent with the national average. However, the level of vacant floorspace (11.2%) is above the national average (9.3%).

6.18 Based on our site visit there were no significant concentrations of vacant units within the two shopping centres to indicate that particular areas of the centre are failing or are unattractive as shopping locations. The old BHS unit is the largest vacant unit, albeit interest has been expressed by a major retail anchor (Primark) to occupy it and planning permission has been granted accordingly (see below).

6.19 It is noted that the Food Centre is primarily vacant and this would represent a major redevelopment opportunity. It is understood that hurdles associated with land ownership are present. The Food Centre is clearly in need of new investment and a "rethink" in asset management terms as to its future role and optimum tenant mix. We understand that the owners are looking at all options to bring the building back into commercial use - all uses are being explored, including retailing, (both comparison and convenience) leisure, residential, hotels, independent retailers, and evening economy uses.

6.20 Our site visit has also highlighted a number of vacancies in the Theatre District. However, it is currently in the process of being refurbished which explains the vacancies. It will be transformed into a more family orientated destination, to include activities such as an Escape Room, an indoor soft play area, and a mini golf.

6.21 The Point is also currently vacant, albeit outline planning permission for its redevelopment was granted in February 2015 (13/01729/OUT) to provide a range of retail (use classes A1, A2, A3, A4 and A5) and leisure

(use class D2) uses and incorporating a maximum of 20,600 sqm. (Gross Internal Area) floorspace. This site hence now forms a primary opportunity for redevelopment.

- 6.22 Overall we consider that the centre is performing relatively well in terms of vacancy levels, albeit the vacant elements (Food Centre, and the Point) are currently inhibiting CMK from realising its full potential. We would recommend that these two assets be prioritised for redevelopment.

Multiple and Independent Retail Representation

- 6.23 The 2016 Goad Category Report identified that there are 261 multiple retailers in the surveyed area (see **Table 4 of Appendix 2**). This includes a number of prominent names including four department stores (including John Lewis, House of Fraser, Debenhams, Marks and Spencer), and a larger number of mid-range to high end high street fashion retailers (including Hobbs, Zara, New Look, Topshop / Topman, H&M, River Island, Pandora, etc.), and national supermarket names (e.g. Sainsbury's, and Iceland).
- 6.24 The independent offer primarily consists of traders in the Open Market, meaning that the overall retail representation in CMK is skewed towards multiples. Given the role of CMK this is not considered alarming, however independent stores and shops can contribute significantly to the overall diversity, vitality and viability of the town centre's offer, and its unique character.
- 6.25 The urban structure of Milton Keynes, and the fact that the majority of retailers are accommodated in the purpose-built shopping centres, means that secondary frontages, where the majority of independent shops would usually congregate, are not established. It is noted that the Open Market has a semi-permanent character to it, suggesting that a permanent "independent" quarter could be promoted within CMK. Indeed, larger centres like CMK often adopt this approach: Manchester has its multiple offer in the Arndale Centre complemented by the independently-let Northern Quarter; Oxford's Westgate is be supplemented by the popular Covered Market.
- 6.26 In summary, we consider that CMK has a strong multiple offer, but could benefit from an "independent" quarter which would positively add to the character of the centre, and its overall vitality.

Markets

- 6.27 CMK benefits from the Open Market located in the Market Square, outside Centre: MK. It is open on Tuesday, Thursday to Saturday, with a smaller version of the market operating on Sunday. The Market sells a good variety of goods including fresh food. On the day of visit the market was busy, but we found that navigating through it was difficult.
- 6.28 The market contributes positively to CMK's vitality and viability, and its fruition should be encouraged. We note that it could benefit from better marketing, and perhaps a relocation to a more permanent, covered location. We note that the CMK Alliance Plan 2026, A Business Neighbourhood Development Plan for Central Milton Keynes (October 2026) encourages the establishment of a permanent covered Market Hall in block D3 (see Policy CMKAP SS2).

Retailer Demand & Requirements

- 6.29 **Table 14 of Appendix 2** sets out the retail requirements as listed by the Requirement List (April 2016) and CoStar Town Focus Report (April 2016). In summary there are 83 operators with published requirements for representation in CMK; equivalent to a total floorspace of 814,091 sq ft. gross. These include high profile fashion retailers (such as Guess and Joy), family-orientated leisure operators/ evening economy operators (such as

Caffe Concerto, Toby Carvery, Marston's, Escape Hunt, Pitchers and Piano), Aldi foodstore, a hotel (Easyhotel), and gym operators (Cross Fit).

Prime Zone A Rents

- 6.30 At end of 2016, agent sources estimated prime rents in Milton Keynes at £230 psf Zone A. This represents no change on the mid 2016 level of prime rents in the city, with rents remaining 13.2% below the pre-recession peak of £265 psf ZA. On average, prime rents across the PROMIS 200 Towns remain 28% below the pre-recession peak. Top Zone A rents for Milton Keynes have traditionally been achieved in the Centre: MK, although the gap between the two shopping centres (Intu) has narrowed in recent years. At Intu Milton Keynes top rents remain relatively stable at £215 psf Zone A.
- 6.31 Whilst we do not hold information on Prime Zone A rents in Xscape, we understand that Coal and Wagamama both took new restaurant units on the ground floor of Xscape in 2013 at £37 psf and £40 psf respectively. The agents for the Theatre District indicated that units are rented at between around £25 psf and £50 psf.
- 6.32 **Table 15 in Appendix 2** compares Prime Zone A rents achieved in CMK at 2016 with other centres of similar role and function, namely Reading and Cambridge. This shows that in comparison to these centres, CMK performs adequately. **Figure 2 in Appendix 2** is sourced from the PROMIS report and illustrates the changes in the centre's Prime Zone A Rents since 1989, benchmarked against the sub-regional and PROMIS average for all centres.

Household Survey

- 6.33 We have drawn on the findings of the household telephone interview survey (HTIS) to help gauge customers' views and perceptions of the town centre as a place to shop and visit for a range of leisure uses and other activities.
- 6.34 The majority of respondents across the entire Study Area (20.11%) indicated that they visit CMK once a month for shopping and other town centre uses. Approximately 15.20% visit every two weeks, 15.07% visit three-four times a year, 14.92% visit once every two months and 12.61% visit one day a week. Overall 9.60% of respondents claim they never visit CMK.
- 6.35 The household telephone interview survey asked specific questions on respondents' views and perceptions of CMK. The survey results showed that respondents mainly liked the following features of CMK:

Table 6.2 Key factors respondents liked about CMK

Response	Total Catchment Area
Good range of non-food shops	24.8%
Good range of 'high street' retailers/multiples	19.7%
Nothing/very little	17.1%
Close to home	15.5%
Easy to park	10.7%
Compact	9.8%

Source: HTIS 2017

6.36 As **Table 6.2** shows, a high number of respondents (24.8%) like the centre because its range of non-food shops. A lower proportion of respondents (9.3%) like the centre because of its food stores. Other factors respondents like about the centre include its attractive environment, good selection of pubs, cafes and restaurants and the range of independent shops. These results all support the findings of the town centre health check.

6.37 Respondents were also asked what, if anything, they would improve in the town centre that might encourage them to visit more. The most frequent suggestions are as follows:

Table 6.3 Key Improvements for CMK

Response	Total Catchment Area
Nothing	37.6%
Free car parking	27.7%
More/better parking	18.4%
Don't know	6.5%
More independent shops	5.0%
Better public transport	3.6%

Source: HTIS 2017

6.38 As **Table 6.3** shows, a high proportion of overall respondents appear to be happy with the town centre as 37.57% stated they would change nothing within the centre. The most frequently suggested improvements to the town centre include issues around parking such as introducing free parking, more/better parking provision and better public transport. Respondents claimed more independent shops would improve the centre; this is in line with the findings of the health check which identified a stronger multiple provision.

Environmental Quality

6.39 It was found that whilst the centre is clear of rubbish and graffiti, and benefits from a number of trees, the main flaw of the centre is its lack of character, and a lack of a “heart”. The strict grid system combined with the lack of architectural diversity / landmarks detracts from urban legibility and the overall environment. It would be highly recommended that any future development with CMK should seek to follow contemporary urban design and place-making principles.

6.40 The dominance by car parking within the PSA also detracts from overall environment. The PSA lacks public and open space, which would be highly beneficial in establishing a sense of place; additionally improvements to public realm would be highly encouraged.

6.41 The relationship between the theatre and gallery buildings and the adjoining leisure buildings is poor and does not encourage linked trips – the most direct access route is via the back-of-house area. We understand that as part of the Theatre District refurbishment works this matter will be addressed.

6.42 Within the shopping centres, the environment is pleasant, albeit improvement to legibility would be encouraged.

6.43 In the evening time it was found that the CMK had an unsafe feel to it; the poor design of public realm (underpasses, poor lighting) combined with the lack of people discourages visitors.

Accessibility

- 6.44 Public transport facilities are reasonable within the central area. Milton Keynes railway station is situated on the western side of CMK. Milton Keynes is situated on the West Coast Mainline with services provided by Virgin and London Midland. Regular services are therefore available to London Euston, Birmingham, Manchester, Liverpool and Glasgow.
- 6.45 The centre's main retail and leisure facilities are located some distance from the railway station. Walking times from the station to PSA would be between 15 and 20 minutes, and the route could benefit from better signage and measures (such as active frontages and public realm improvements) to entice pedestrians from the station into the PSA. There are however frequent bus services also connecting the station to the shopping centres.
- 6.46 There is a comprehensive network of regular bus services throughout the city, connecting CMK to other towns and Luton Airport. There are designated bus lanes through the central area from the railway station to the main shopping and leisure facilities.
- 6.47 Within the PSA, we found that legibility was poor. Lack of landmarks and signage means that new visitors are unable to navigate with ease through the centre; and that the various elements (the shopping centre vs Xscape vs Theatre District) of the PSA were poorly linked together. This would suggest that the various elements of the centre are used in isolation from each other. As such the centre could benefit from public realm measures to facilitate integration.
- 6.48 The streets are set out in a uniform grid pattern which provides easy access for motorists but creates an environment dominated by highway infrastructure and car parking. The grid layout in general discourages pedestrian movement.
- 6.49 The PSA is well catered from in terms of parking spaces, with available parking areas shown on **Figure 3** of **Appendix 2**. We note that a large proportion the spaces in the PSA are charged at £2 per hour between 7 am and 6 pm, which is considered quite expensive. It is also noted that a planning permission has recently been granted for a multi-story car park east of John Lewis. (Ref: 14/01628/FULEIS).

Out of Centre Provision

- 6.50 The main out of centre retail provisions are retail units located along Snowdon Drive, namely Winterhill Retail Park, Cairngorm Gate and Routeco, where the likes of DFS, Furniture Village, Homebase, Dunelm, PC World and Wickes are located. Together these predominantly provide the bulky goods retail offer.
- 6.51 Additionally Patriot Drive in Rooksley hosts Central Retail Park, which primarily accommodates typical retail warehouse occupiers such as Hobbycraft, Halfords and Decathlon, and the B&Q.
- 6.52 **Table 16** of **Appendix 2** sets out the current occupiers at the above-mentioned locations, where the information was available.
- 6.53 In terms of convenience provisions, the most notable are Aldi on Bradwell Common Boulevard, and Lidl on Oldbrook Boulevard.

New Investment & Potential Development

- 6.54 There are a number of new development opportunities within CMK.

- 6.55 Policy SD3 of the proposed submission version of Plan: MK sets out the CMK's growth and areas of change. It proposes CMK to accommodate 1,900 additional new homes; 150,000-200,000 sqm office floorspace; 40,000 sqm of retail floorspace ; the site requirements of further and higher education institution; and additional food and drink and hotel floorspace
- 6.56 The owners of the **Intu centre** have secured an outline permission for its redevelopment to create a maximum of approximately 11,000sqm of additional floor space (15/01074/OUT). The permission allows for flexibility in the final balance of uses but the following mix is indicated: 4000sqm of A1 (retail) & A2 (financial and professional), 1500sqm of A3 (restaurant and café), 1100sqm of A5 (hot food takeaway), 1800sqm of D2 (leisure) uses and PLUS 2,600sqm of servicing areas and toilets. There would also be approximately 2600sqm of servicing areas and toilets. The outline scheme includes details of access and layout whereas matters related to scale, design and landscaping are reserved for future applications. The owners are looking to deliver a boutique cinema as part of the scheme.
- 6.57 At the time of our visit Centre: MK was in a process of undergoing cosmetic redevelopment, which is aimed at enhancing the centre's sense of place (16/01776/ADV, 16/01777/FUL and 16/01965/LBC, 16/01830/FUL and 16/01831/LBC, 15/02027/FUL and 15/02028/LBC).
- 6.58 **The Point** benefits from outline planning permission for its redevelopment which was granted in February 2015 (13/01729/OUT). This will provide a range of retail (use classes A1, A2, A3, A4 and A5) and leisure (use class D2) uses and incorporating a maximum of 20,600 sqm. (Gross Internal Area) floorspace. This site now forms a primary opportunity for redevelopment. We consider the redevelopment of this site as beneficial to the overall vitality of the centre.
- 6.59 **The Theatre District** is currently in the process of being refurbished. The owners, Otium Real Estate, are in the process of refurbishing the quarter to make it into a more family orientated destination, to include activities such as an Escape Room, an indoor soft play area, and a mini golf.
- 6.60 **Lloyds Court**, 28 Secklow Gate was granted planning permission in March 2016 (15/01600/FUL). The scheme seeks to retain the existing façade, and to create 10,538 sqm. space, including Use Class A1 convenience retail (up to 2,892 sqm.), comparison retail (up to 10,413 sqm.), service (up to 454 sqm.), Use Class A2 retail (up to 3,561 sqm.), Use Class A3 retail (up to 3,015 sqm.), Use Class A4 retail (up to 694 sqm.), sui generis betting office space (up to 291 sqm.), and Use Class D1 space (up to 448 sqm.). The scheme also includes demolition and removal of courtyards, retention of existing unit let to Lloyds Bank, and the addition of an enclosed delivery bay, cycle parking spaces and improvements to the public realm. The scheme aims to open for Autumn 2018.
- 6.61 **MK Gallery** has been granted planning permission for refurbishment and extension of 1,287 sqm (Ref 14/02470/FUL) subject to a S106 Agreement being signed. This will incorporate ancillary D2 (Assembly and Leisure), A1 (Shops), A3 (Restaurants and Cafes) and A4 (Drinking Establishments) uses; refurbishment and alterations to the facade of the existing building; alterations to the existing landscaping, including the creation of a new cafe terrace and new access.
- 6.62 A planning permission at **402 North Row** will be issued following the signing of a S106 Agreement for phased clearance and redevelopment of the site to provide a new YMCA residential hostel (C1) with 196 residential units and a range of non-residential facilities (A1, A2, A3, B1, D1 and D2) alongside a residential apartment development providing up to 261 apartments, ancillary accommodation and commercial space capable of accommodating A1, A2, A3, B1 and D1 uses (Ref 16/01769/FUL).
- 6.63 Planning permissions has been granted in the **Centre:MK** at 116 Silbury Arcade (17/01684/FUL) for extensions and alterations to former BHS Unit to provide additional retail trading floor and associated roof top plant and

enclosure and associated works. The proposed development will be occupied by for Primark spread over three floors with a net tradeable floorspace of 9,000 sqm.

- 6.64 Planning permission for a new **130 bedroom budget hotel**, retail unit (use class A1 234 sqm.) and leisure units (use class A3/A4) was granted on October 2015 (Ref: 14/02498/FUL). The development is currently under construction.
- 6.65 The level of upcoming schemes shows investor confidence in the centre, and its desirability.
- 6.66 As discussed above, the redevelopment of the Food Centre would be highly desirable for the vitality of the centre. Such development could deliver uses within the night time economy sector (such as nightclubs and bars). This could be combined with the desired reconfiguration of the Theatre District to improve the relationship between the Theatre building and the surrounding leisure uses. Such development could also deliver realm features such as a public square.
- 6.67 The CMK Alliance Plan 2026, A Business Neighbourhood Development Plan for Central Milton Keynes (October 2026) encourages the establishment of a permanent covered Market Hall in block D3 (see Policy CMKAP SS2). Whilst we understand that no progress has been made to secure a covered Market, this should be an opportunity to explore.

Summary

- 6.68 In summary the health check assessment has demonstrated that overall CMK is a vital and viable centre. The key strengths and weaknesses of the centre include the following:
- It has a good range of shopping and leisure facilities typically found in a centre of its size and position in the retail hierarchy. The Centre: MK and Intu Milton Keynes Shopping Centres provide modern retail floorspace and a mix of places to eat and drink. These are popular and successful, and include a number of prominent names including four department stores: John Lewis, House of Fraser, Debenhams, Marks and Spencer.
 - The centre has a generally good convenience provision, which is anchored, by a Sainsbury's, M&S Foodhall and Iceland. This is supplemented by a number of independent market stalls.
 - There is a strong comparison offer, especially within the fashion categories, which is dominated by multiple retailers.
 - The historic development of Milton Keynes did not accommodate the development of secondary frontages, catering for independent retailers. Opportunities should be explored to create a permanent "independent" quarter within CMK.
 - CMK benefits from the Open Market located in the Market Square. Opportunities should be explored to move the market into a permanent location, where rent rates are more affordable.
 - The vacancy level is low and there is no significant concentration of vacant units within the Shopping Centres. However, the Food Centre is primarily vacant and presents a major redevelopment opportunity. We understand that issues surrounding landownership create hurdles for this site coming forward for redevelopment.
 - There is a strong and growing market demand from retail and leisure operators for representation in the town centre and it is performing well in terms of reported Prime Zone A Rents.
 - There are a number of key developments in the pipeline (the Point, the Intu extension, and Theatre District refurbishment) which will further improve the town centre offer and the quality of the environment.
 - The centre is well connected by public transport, and caters well for car users. However pedestrian accessibility and urban legibility /permeability should be improved. There is a real need to create natural

pedestrian links between the Railway station and PSA, and between the individual elements within the PSA. Better links to Campbell Park should be established.

- Whilst the centre is well provided for in terms of the number of parking spaces, a high proportion of these are expensive and this discourages visitors to the centre.
- The centre lacks evening / night time economy, and is quiet during the evening times. Opportunities should be explored to improve this, not only by bringing appropriate uses (such as bars, night clubs, and music venues) but also by increasing the CMK residential population.
- The centre lacks character. Architectural diversity and creation of landmarks is highly encouraged. The dominance of car parking within the PSA also detracts from the overall environment. The PSA lacks public and open space, which would be highly beneficial in establishing a sense of place; additionally, improvements to public realm would be highly encouraged. It would be highly recommended that any future development with CMK should seek to follow contemporary urban design and place-making principles.

7 KINGSTON DISTRICT CENTRE – HEALTH CHECK ASSESSMENT

Context

- 7.1 Kingston District Centre lies close to Junctions 13 and 14 of the M1, circa 3.1 miles southeast of Milton Keynes. The Core Strategy (2013) designates it as a District Centre (see Policy CS1 and CS4), sitting below the Regional Shopping Centre of Milton Keynes Central. It therefore functions primarily as a centre accommodating the weekly convenience needs of its catchment area. The Kingston Centre is distinguished from the other Town Centres within the Council area due to its character (i.e. retail park), its large quantity of retail floorspace and provision of larger format units.
- 7.2 The Kingston Centre is a retail park, which provides approximately 27,000 sq ft. (GIA) of retail/ service floorspace in 41 units. The centre opened in 1992 to serve the needs of the population in the western and eastern flanks of the city, combining superstores, large retail outlets, some local centre type uses and large areas of surface level parking. It now functions as a centre accommodating the weekly convenience shopping needs of its catchment population. As well as retail units, the centre also has a number of community facilities including a day nursery and a gymnastics centre.

Retail Composition & Diversity of Uses

- 7.3 Experian Goad data is not available for Kingston and our assessment is therefore based on our own visit to the District Centre, and our survey of its composition.
- 7.4 Table 7.1 summarises the composition of the centre's retail and service uses, and the mix and diversity of uses are reviewed in more detail below.

Table 7.1: Current Retail and Service Offer - Outlets

Category	Number of Outlets	% of Total Outlets	UK (%)	Index
Comparison	13	31.7%	31.6%	100
Convenience	3	7.3%	8.7%	84
Retail Service	8	19.5%	14.2%	138
Leisure Service	16	39.0%	23.6%	165
Financial & Business Service	1	2.4%	10.5%	23
Vacant	0	0.0%	11.2%	0
Other Retail	0	0.0%	0.1%	0
TOTAL	41	100.0%	100%	

Source: CJ Site Visit (2017)

Notes: Based on data gathered and collated from own visit to the district centre. Figures may not fully add up to 100% due to rounding.

Convenience Offer

- 7.5 Although Kingston District Centre has a lower than average proportion of convenience goods units (7.3% compared to the national average of 8.7%), it has a substantial floorspace offer. The main convenience store is Tesco Extra that extends to 129,800 sq ft. (gross). Tesco also provide a "click and collect" shopping service from a small unit within the District Centre, which enables the shopper to visit and collect a purchase from a physical store whilst being able to browse and compare prices online. The Marks and Spencer store within the centre also incorporates a convenience element. Kingston's convenience offer is supported by a health food shop (Holland and Barrett) as well as an independently owned bakery.

7.6 As such we consider that the Kingston Centre has a good convenience provision catering for its local population.

Comparison Offer

7.7 There are 13 comparison goods retailers located in Kingston District Centre. The number of comparison goods units within the centre is in line with the national average (31.7% compared to 31.6%).

7.8 In terms of comparison offer, the centre is characterised by a number of multiple retailers including Boots, Carphone Warehouse, Clarks, and Home Sense. Marks and Spencer is the only department store in the centre. The only independent comparison retailers located in the centre are the Kingston Community Shop and 'Lucie Green' bridal store.

7.9 A variety of comparison goods categories are represented in the centre including charity shops, chemist & drugstores, children's and infants' wear, department & variety stores, footwear, hardware & household goods, ladies & menswear, ladies wear & accessories, telephones & accessories, and toys, games and hobbies.

7.10 Overall, it is considered that the Kingston Centre has an adequate comparison offer.

Service Offer

7.11 As Table 7.1 shows, there are 25 service outlets in Kingston District Centre. They account for 60.9% of all units compared to the national average of 48.3%. From our experience, the domination of service outlets in District centres is quite common, and is one of the standard characteristics that defines the role and function of such centres. The main service provision is as follows:

- There are 8 **retail services**, which represents 19.5% of total outlets. This is significantly above the national average of 14.2%. This category is mostly made up of health and beauty outlets. There are 3 units in this category, equivalent to 7.3% of units, which is slightly below the national average of 8.7%. Provision also includes an opticians, a drycleaners, a vehicle repairs/ service workshop and 2 travel agents.
- In terms of **financial services**, there is 1 outlet. This represents 2.4% of total units, which is significantly below the national average of 10.5%. Taylor's estate agents operates within the centre.
- There are 16 **leisure service** outlets, equivalent to 39.0% of total units, which is significantly above the national average of 23.6%. This category is mostly made up of restaurants. There are 6 units in this category, equivalent to 15% of units, which is significantly above the national average of 5%. Provision also includes 5 cafes, 3 fast food units, and 2 sports and leisure units. Although leisure provision appears to be good, it has been noted that the District Centre could benefit from further leisure outlets, which would spark a night time economy, since the centre is significantly less busy during the evening.

7.12 Overall, we consider the Kingston District Centre to have a good provision of retail and leisure services. Financial services, however, are underprovided and therefore there is an opportunity to increase the provision of retail banks or building societies in order to create an increasingly functional centre.

Vacancies

7.13 **Table 7.1** shows that Kingston District Centre has no vacant outlets. This is therefore significantly below the national average of 11.2%. As such, we consider that the centre is performing very well in terms of vacancy levels.

Multiple and Independent Retail Representation

- 7.14 The visit to the District Centre identified that there are 31 multiple retailers in the surveyed area (see **Table 3** of **Appendix 3**). This includes a number of key names such as Tesco Extra, Boots, M&S, and Next.
- 7.15 There are also 10 independent retailers/ service providers within the District Centre, and this includes a number of health and beauty retailers and fashion retailers. These contribute to the overall diversity, vitality and viability of the centre.
- 7.16 In summary, it is considered that there is a good and complementary mix of multiple and independent retailers serving the centre and its catchment population. It will be important to maintain the current level of multiple retailers in order to retain the vitality of the centre.

Markets

- 7.17 No markets operate within the Kingston District Centre.

Retailer Demand & Requirements

- 7.18 The retail requirements for Kingston District Centre are not available via the *Requirement List* (April 2017) or *Shop Property* (March 2017).

Prime Zone A Rents

- 7.19 Evidence from CJ in house agents indicate that prime Zone A rents in Kingston stand at around £30-60 per sq ft. **Table 13** in **Appendix 3** compares Kingston to other locations.

Household Survey

- 7.20 We have drawn on the findings of the household telephone interview survey (HTIS) to help gauge customers' views and perceptions of the town centre as a place to shop and visit for a range of leisure uses and other activities.
- 7.21 The majority of respondents across the entire Study Area (48.95%) indicated that they never visit Kingston for shopping and other town centre uses. Approximately 10.2% visit three-four times a year, 9.0% visit monthly, 6.0% visit one day a week and 5.9% visit once a year. Only 6.0% of total respondents visit one day a week.
- 7.22 The household telephone interview survey asked specific questions on respondents' views and perceptions of Kingston. The survey results showed that respondents mainly liked the following features of Kingston:

Table 7.2 Key Factors Respondents Liked About Kingston

Response	Total Catchment Area
Nothing/very little	22.0%
Easy to park	15.9%
Close to home	15.3%
Good range of non-food shops	14.0%
Good food stores	11.0%
Good range of 'high street' retailers/multiples	9.4%

Source: HTIS 2017

- 7.23 As **Table 7.2** shows, a high number of respondents (22.0%) stated that they did not like the centre however responses like this are common to this type of survey. Key factors respondents claimed they like about the centre include how easy it is to park, it is close to home, the range of non-food shops (including national multiples) and good range of food stores.
- 7.24 Respondents were also asked what, if anything, they would improve in the town centre that might encourage them to visit more. The most frequent suggestions are as follows:

Table 7.3 Key Improvements for Kingston

Response	Total Catchment Area
Nothing	64.8%
Don't know	15.8%
More/better parking	10.6%
More/better comparison retailers	2.0%
More national multiple shops/high street shops	2.0%
More independent shops	1.4%

Source: HTIS 2017

- 7.25 As **Table 7.3** shows, the majority of overall respondents appear to be happy with the town centre as 64.77% stated they would not change anything within the centre. The most frequently suggested improvements to the town centre include parking and more comparison retailers, including a mix of both independents and national multiples.

Environmental Quality

- 7.26 Kingston District Centre benefits from a pleasant and functional shopping environment, and is relatively modern in its design and layout. It is a retail park containing a number of large format stores with car parking.
- 7.27 The well-kept shop fronts and clean shopping environment contributes to the quality of the environment.
- 7.28 There is an enclosed mall at the entrance to Tesco Extra, which provides access to a public square and a number of community facilities including a day nursery and a gymnastics centre. There is limited street furniture within the centre, and there is a lack of green open space.

- 7.29 Overall, the environmental quality of the Kingston District Centre is good, however there could be an opportunity to increase the provision of green open space in order to create a more aesthetic environment, which would attract increasing numbers of visitors.

Accessibility & Pedestrian Flows

- 7.30 Kingston District Centre has good road links. It is approximately 2 miles from Junctions 13 and 14 of the M1 Motorway.
- 7.31 All parking in the centre is free and there are 1,319 spaces. These include disabled and parent/toddler spaces. The car park is split into two parts by a covered walkway, and as such there is poor pedestrian and vehicular circulation.
- 7.32 No railway station is located in close proximity to the District Centre. The nearest station is located at Milton Keynes, which is a short taxi or bus journey away. There are approximately 300 bus movements per day in and out of the centre. The number 8 and number 300 buses operate regular services between Milton Keynes Central and the Kingston District Centre. A number of other services, including numbers 9, 17, 24, 25, 62, 138, and 148, are available to surrounding towns and villages.
- 7.33 The centre has relatively poor pedestrian accessibility, which is largely a result of its location surrounded by a number of busy roads. The subway beneath the Brinklow roundabout provides the primary pedestrian access from residential areas. It appears that pedestrian flows are concentrated on Tesco Extra, the District Centre's anchor store.
- 7.34 Wayfinding in the centre is generally good, and this helps visitors to navigate their way around the retail park with ease.
- 7.35 The centre has MK Santander Cycles, which are located in close proximity to the Kingston Library. This bicycle hire scheme, which launched in June 2016, is enabled by the 300 bikes across the 42 docking stations situated around Milton Keynes.
- 7.36 Overall, it is considered that the District Centre is easily accessed by car, however there is an opportunity to improve pedestrian accessibility in order to attract visitors by foot from surrounding residential areas.

Out of Centre Provision

- 7.37 Costco Wholesale lies 0.4km to the north of Kingston District Centre on Mandeville Drive. Costco Wholesale is a membership warehouse club, which combines a comparison and convenience offer, selling items including bulk groceries, electronics and household goods.

New Investment & Potential Development

- 7.38 The Core Strategy (2013) identifies the Eastern EA as a sustainable urban extension to Milton Keynes, between Kingston and the M1, providing a range of homes and jobs to create an attractive entrance to the city. There is capacity to deliver 400 dwellings within this area, and completion is expected between 2021 and 2026. Whilst there is no new retail provision, the urban extension is to provide 11,450 jobs, with circa 3,450 jobs to be delivered on 17ha of small/medium scale B1/B2 employment by 2021. The increase in population will put pressure on existing provision at the Kingston District Centre, but may also encourage new investment into the centre. As part of the Eastern Expansion Area, there are to be improvements to the Kingston Roundabout; this

will involve enlarging and signalling the junction, improving pedestrian and cycle connections for the area, including an underpass. It is hoped that such improvements will make the Kingston Centre more accessible.

- 7.39 Planning permission was granted in March 2016 for the refurbishment of the Kingston Centre (Ref: 15/0913/FUL). The main improvements of the scheme include reconfiguration of existing car parks and demolition of covered walkway to improvement pedestrian and vehicular circulation. Furthermore, re-cladding of retail unit facades is proposed, along with the creation of a new pedestrian promenade, new external children's play space, remodelling of hard and soft landscape and the erection of a decked car park adjoining Winchester Circle.

Summary

- 7.40 In summary, we consider Kingston to be a healthy and viable centre that serves well its catchment population. It is performing well against many of the health check key performance criteria. The key findings are summarised below:

- Kingston District Centre has a good mix of retail and service offer. Comparison, retail and leisure offer is generally in line or above the national averages. Financial service provision within the centre, however, is low, and we therefore recommend improvements in this area in order to diversify the centre's offer.
- There is an opportunity to attract further leisure providers into the centre in order to create a night time economy, since Kingston is significantly less busy in the evening.
- There are currently no vacant units within the District Centre.
- The environmental quality of the District Centre is considered to be relatively good. The modern design and layout of the centre, along with the well-kept shop fronts, create a pleasant and functional shopping environment. Despite this, there is limited street furniture within the centre, and there is also a lack of green open space. Improvements in these areas could enhance the shopping environment and as a result attract a larger number of visitors to the area.
- Kingston is supplied by an ample amount of free parking, which encourages visitors. Despite this, the centre has relatively poor pedestrian accessibility, which is largely the result of its location surrounded by a number of busy roads. Pedestrian access could be enhanced through the introduction of another subway, as well as pedestrian crossings. The centre could benefit from a reconfiguration of the car park in order to increase vehicular and pedestrian circulation, and this is likely to come forward through the grant of planning permission at the Kingston Centre in March 2016.

8 WESTCROFT DISTRICT CENTRE – HEALTH CHECK ASSESSMENT

Context

- 8.1 Westcroft is a large retail park development located circa 2.9 miles southwest of Milton Keynes, in the civil parish of Shenley Brook End. The Core Strategy (2013) designates it as a District Centre within the retail hierarchy of the Milton Keynes Council (see Policy CS1 and CS4), where it primarily functions as a centre accommodating the weekly convenience shopping needs of its catchment population. Westcroft District Centre, like Kingston Centre, is distinguished from the other District Centres of Bletchley and Wolverton since the priority of the centre is controlled expansion and diversification of the centre with service and leisure and community uses.
- 8.2 Westcroft, which opened in 1994, is a purpose built centre combining superstores and large retail outlets with smaller retail and service units. The centre is anchored by Morrison's and Aldi, with a number of budget-aimed comparison retailers also present. The centre provides approximately 75,600 sq ft. of gross retail/service floorspace in circa 25 units.

Retail Composition & Diversity of Uses

- 8.3 Experian Goad data is not available for Westcroft and our assessment is therefore based on our own visit to the District Centre, and our own survey of its composition.
- 8.4 **Table 8.1** summarises the composition of the centre's retail and service uses, and the mix and diversity of uses are reviewed in more detail below.

Table 8.1: Current Retail and Service Offer - Units

Category	Number of Outlets	% of Total Outlets	UK (%)	Index
Comparison	8	32.0%	31.6%	101
Convenience	3	12.0%	8.7%	138
Retail Service	6	24.0%	41.2%	169
Leisure Service	6	24.0%	23.6%	102
Financial & Business Service	2	8.0%	10.5%	76
Vacant	0	0.0%	11.2%	0
Other Retail	0	0.0%	0.1%	0
TOTAL	25	100%	100%	

Source: CJ Site Visit (2017)

Notes: Based on data gathered and collated from own visit to the District Centre. Figures may not fully add up to 100% due to rounding.

Convenience Offer

- 8.5 Westcroft District Centre has a slightly higher than average proportion of convenience goods units (12.0% compared to 8.7%). The main convenience store at the centre is the Morrisons supermarket that extends to 7,432 sqm (gross) and incorporates a bakery, a butchers, and a fishmongers. The convenience offer is supported by Aldi and Timpson, the shoe repair and key cutting store.
- 8.6 We consider that the Westcroft Centre has a good convenience provision catering for its local population, and as such there could be potential to increase such provision.

Comparison Offer

- 8.7 There are 9 comparison goods retailers located in Westcroft District Centre, and therefore the centre has a higher than average proportion.
- 8.8 In terms of comparison offer, the centre is characterised by a number of multiple retailers including Poundstretcher, Next, Boots. The variety of comparison goods categories represented in the centre is limited; this includes charity shops, chemist and drugstores, hardware & household goods, ladies & menswear, other comparison goods, and vehicle & motorcycle sales. There is a significant overprovision of vehicle & motorcycle sales centres; there are currently three within the centre, Renault, Mazda and Citroen, which is equivalent to 12.0% of total units compared to the national average of 0.3%.
- 8.9 It would appear that the comparison offer is predominantly aimed at the budget shopper with stores such as Poundstretcher, Poundland, Aldi and B&M. There could, therefore, be an aspiration to improve the overall quality of the offer, subject to demand, to meet the needs of the wider community.

Service Offer

- 8.10 As **Table 8.1** shows, there are a total of 14 service outlets in Westcroft District Centre. They account for 56.0% of all units. The following provides a brief summary of provision in the different service categories:
- There are 6 **retail services**, which represents 24.0% of total outlets. This is significantly above the national average of 14.2%. This category is mostly made up of health and beauty outlets; there are 3 units in this category, which is equivalent to 12.0% of units compared to the national average of 8.7%. Provision also includes a petrol filling station, a travel agents, and an opticians.
 - In terms of **financial services**, there are 2 outlets, which represents 8% of total units, which is below the national average of 10.5%. The financial services include 'O'Riordan Bond' and 'Taylors', both of which are estate agents.
 - There are 6 **leisure service** outlets, which is equivalent to 24.0% of total units. This is in line with the national average of 23.6%. Leisure provision includes a public house, a restaurant, a betting office and fastfood outlets. Multiple leisure operators include McDonalds, KFC, Pizza Hut, and Ladbrokes.

Vacancies

- 8.11 Westcroft District Centre has no vacant outlets and this is therefore significantly below the national average of 11.2%. Overall, we consider that the centre is performing very well in terms of vacancy levels.

Multiple and Independent Retail Representation

- 8.12 The visit to the District Centre identified that there are 14 multiple retailers/ service providers in the surveyed area (see **Table 3** of **Appendix 4**). This includes a number of key names such as Morrisons, McDonalds, and Pizza Hut.
- 8.13 There are also 11 independent retailers/ service providers within the District Centre, and this includes a number of independent health and beauty retailers and fashion retailers. The independent stores and shops contribute significantly to the overall diversity of the centre.
- 8.14 In summary, it is considered that there is a good and complementary mix of multiple and independent retailers serving the centre and its catchment population. It will be important, however to maintain the current level of multiple retailers in order to retain the vitality of the centre.

Markets

- 8.15 No markets operate within the Westcroft District Centre.

Retailer Demand & Requirements

- 8.16 The retail requirements for Kingston District Centre are not available via the Requirement List (March 2017) or Shop Property (March 2017).

Prime Zone A Rents

- 8.17 The level of rent that businesses are prepared to pay for retail space and yields achieved in investment transactions in a centre provides a further indication of the relative strength of the centre and its prime retail pitch as a shopping centre. Evidence from CJ in house agents indicate that prime Zone A rents in Westcroft stand at around £19-42 per sq ft. **Table 13** of **Appendix 4** compares Prime Zone A rents achieved in Westcroft District Centre at 2016 with other centres of similar role and function.

Environmental Quality

- 8.18 Westcroft District Centre benefits from a functional and clean shopping environment. It is a retail park containing a number of large format stores with car parking.
- 8.19 All buildings are well maintained with no signs of graffiti.
- 8.20 There appear to have been some attempts to incorporate areas of public open space into the development design. This can be seen with the area of hard landscaping and seating in the northwest corner of the centre. The street furniture, however, is not in good condition and therefore detracts from the retail environment.
- 8.21 Whilst the car parking aisles have been lined with trees, there has been little attempt to incorporate other planting within the centre. Plant boxes lie empty and therefore there is potential for improvements to enhance the character of the District Centre.
- 8.22 Overall, the environmental quality of Westcroft District Centre is adequate. Improvements could be made, however, to incorporate more public open space and planting, and better quality street furniture in order to enhance the centre and improve the shopping experience.

Accessibility & Pedestrian Flows

- 8.23 Westcroft District Centre has relatively good road links; it is located at the junction of two main roads, Chaffron Way and Tattenhoe Street, which provide excellent access by car from surrounding residential units. The centre is close to the Standing Way (A421) and is easily accessible from the A5. There are large areas of car parking within the District Centre, all of which is free.
- 8.24 There is no railway station located in close proximity to the District Centre. The nearest station is located at Milton Keynes, which is a short journey away by taxi or bus. There is an adequate bus service, which operates regular services between Milton Keynes and Westcroft as well as to other surrounding towns and centres including Bletchley, Newport Pagnell, and Oxley Park.

- 8.25 Pedestrian access from surrounding residential areas to Westcroft is somewhat limited. There appear to be two safe routes from Westcroft to the west. To other areas however, beyond the main roads to the south and east, pedestrian connections are much poorer. There is therefore the opportunity to improve such connections, through pedestrian crossings and underpasses.
- 8.26 The centre has MK Santander Cycle, which are located off Wimborne Crescent. This bicycle hire scheme, which launched in June 2016, is enabled by the 300 bikes across the 42 docking stations situated around Milton Keynes.
- 8.27 Overall, whilst the centre's vehicular access is good, there is an opportunity to improve pedestrian links through a combination of pedestrian crossings and underpasses.

Out of Centre Provision

- 8.28 No out-of-centre provisions are around the Westcroft District Centre.

New Investment & Potential Development

- 8.29 We are not aware of any new investment within or potential development of Westcroft District Centre.

Summary

- 8.30 In summary, we consider Westcroft to be a relatively healthy and viable centre in fulfilling a niche role in catering for budget shoppers and serving its local catchment. It is performing well against many of the health check key performance criteria. The key findings are summarised below:
- The centre has a good convenience offer with both a Morrisons and an Aldi present. The comparison provision within the centre is adequate, with a number of multiple high street operators present. Westcroft District Centre also hosts 3 vehicle and motor sales centres, which gives the centre an alternative role and function.
 - There are currently no vacant units within the District Centre. As such, the vacancy rate is therefore significantly below the national average of 11.2%. This further suggests that Westcroft is currently performing well and is a healthy District Centre.
 - The environmental quality of the District Centre is considered to be adequate. Buildings and shop fronts are well maintained. Whilst there have been attempts to incorporate areas of public open space into the development design, there is also potential to improve the condition of street furniture. Such improvements would enhance the shopping environment.
 - Vehicular access to Westcroft District Centre is good, as there is an extensive area of free car parking, which encourages visitors. Pedestrian access to the centre from the surrounding residential development, however, is somewhat limited and could be enhanced through the introduction of pedestrian crossings.

▪ BLETCHLEY DISTRICT CENTRE – HEALTH CHECK ASSESSMENT

Context

- 8.31 Bletchley is a historic town situated in the south-west of Milton Keynes. Bletchley is best known for Bletchley Park, the headquarters of Britain's World War II codebreaking organisation, and now a major tourist attraction. The National Museum of Computing is also located on the Park.
- 8.32 The Core Strategy designates Bletchley as a District Centre, sitting below Central Milton Keynes (see Policy CS1 and CS4), where its key role is to cater for the weekly convenience shopping needs of their catchment populations. Bletchley used to be the main shopping and commercial centre in the Council area but has declined in importance since the development of CMK. It is ranked 633th in the 2016 Javelin Venuescore ranking of all town and shopping centres.
- 8.33 It is a mostly a linear centre that has a distinct “value” offer. It has a large food store (Sainsbury’s) and a range of shops, including some multiple retailers in the Brunel Centre and along Queensway.

Retail Composition & Diversity of Uses

- 8.34 **Table 9.1** summarises the composition of the centre’s retail mix and diversity of uses; and **Table 3** of **Appendix 5** sets out the floorspace composition. It should be noted that the composition is based on the latest Experian Goad Category Report 2015. The Plans showing the extent of the Goad coverage is shown in **Figure 1** of **Appendix 5**.

Table 9.1 Current Retail and Service Offer – Outlets

Category	Number of Outlets	% of Total Outlets	UK (%)	Index
Comparison	48	26.5%	31.6%	84
Convenience	24	13.3%	8.7%	152
Retail Service	28	15.5%	14.2%	109
Leisure Service	44	24.3%	23.6%	103
Financial & Business Service	28	15.5%	10.5%	147
Vacant	9	5.0%	11.2%	44
Other Retail	0	0.0%	0.1%	0
TOTAL	181	100%	100%	

Source: Experian Goad Category Report (2015). Figures may not sum due to rounding.

Convenience

- 8.35 There are 24 convenience units in the survey area according to the latest Experian Goad Category Report 2015. This represents 13.3% of total outlets, which is above the national average of 8.7%. The current floorspace provision (19.5%) is also above the national average (15.19%).
- 8.36 Bletchley hosts a large Sainsbury’s foodstore, as well as Lidl and Iceland in the north of the Centre. There are also 2 bakers, 2 butchers, 2 CTNs, a green grocers, a health foods retailers, off-licences, and a number of small convenience stores.
- 8.37 Bletchley & Fenny Stratford Town Council runs a local street Market on Tuesday, Thursday, Friday and Saturday every week, which also sells convenience goods.

8.38 Overall, we consider that Bletchley has a good convenience provision catering well for its local catchment.

Comparison Offer

8.39 According to the 2015 Goad Category Report, Bletchley has 48 comparison outlets. This represents 26.5% of total units and is significantly below the national average of 31.6%. The current floorspace provision represents 29.1% of total floorspace in the centre, which is also below the national average of 35.50%.

8.40 Across the different comparison sub-categories, the centre has a high representation of charity shops, electrical & other durable goods; hardware & household goods; chemist & drugstores; footwear; and furniture. It would appear that the centre lacks fashion-led retailers.

8.41 The comparison offer is mostly aimed at the budget shopper. Therefore, subject to demand there could be an aspiration to improve the overall quality of the offer to meet the needs of the wider community.

Service Offer

8.42 Service businesses are defined by Experian Goad as including retail, professional and financial services. As **Table 9.1** shows, there are 100 service outlets in Bletchley. They account for 55.2% of all units, which is above the national average of 48.2%. The current floorspace provision (45.5%) is also significantly above the national average (39.3%). The following provides a brief summary of provision in the different service categories:

- There were 28 **retail services** in 2016, which represents 15.5% of total outlets. This is above the national average of 14.2%. This category is mostly made up of health and beauty outlets (16) (predominantly hairdressers, nail bars and beauty salons). There are also three opticians, a dry cleaner, two travel agents, and a post office.
- In terms of **financial services**, there were 28 outlets in 2015, which represents 15.5% of total units and is above the national average of 10.5%. The mix of services is dominated by property services (10), banks and building societies (9).
- There were 44 **leisure service** outlets in 2015. This is equivalent to 24.3% of total provision and is above the national average of 23.6%. The offer is dominated by fast food and takeaways (19), followed by restaurants (6), cafes (5), betting shops (5). It should also be noted that the centre benefits from a new leisure centre opened in 2010, and Bletchley Park is a major tourist attraction.

8.43 In summary, Bletchley has a strong provision of service outlets.

Vacancies

8.44 **Table 9.1** shows, the number of vacant outlets in Bletchley is at around 5.0%, which is below the national average of 11.2%. Overall we consider that the centre is performing relatively well in terms of vacancy levels.

8.45 The majority of the vacant units are found at Agora Shopping Centre, which is likely to be due to an outdated layout of the shopping centre, and the associated lack of prominence / inconspicuous pedestrian access.

8.46 The most noticeable vacant unit in the centre is the former Coop unit.

Multiple and Independent Retail Representation

- 8.47 The 2015 Goad Category Report identified that there are 76 multiple retailers in the surveyed area (see **Table 4 of Appendix 5**). This includes a number of prominent names including Sainsbury's, Boots, Dorothy Perkins, Peacocks and Home Bargains.
- 8.48 The centre also has a strong independent retail and service offer. This includes independent cafés/restaurants/takeaway operators, health and beauty service and fashion and shoes retailers. The independent stores and shops all contribute significantly to the overall diversity, vitality and viability of the town centre's offer.
- 8.49 In summary, we consider that there is a good and complementary mix of multiple and independent retailers, serving the centre and its catchment population. A greater presence of prominent retailers would boost the vitality of the centre and attracting more middle-market names would be particularly beneficial given the current concentration of low-end brands and independent retailers.

Markets

- 8.50 Bletchley & Fenny Stratford Town Council runs a local street Market on Tuesday, Thursday, Friday and Saturday every week. The number of stalls varies depending on the day and the weather, but we understand that on a good day there are around 10 stalls, and the same few traders come on a regular basis (selling products such as food, flowers, bags, mobile phone accessories). The Town Council advised that the market is relatively popular, but there is scope for a wider variety of stalls. We recommend that opportunities should be sought to improve the market. Our research shows that the market could benefit from better marketing, such as a better online presence.

Retailer Demand & Requirements

- 8.51 **Table 14 of Appendix 5** sets out the retail requirements as listed by the Requirement List (April 2017) and CoStar Town Focus Report (April 2017). In summary there are 2 operators with published requirements for representation in Bletchley; equivalent to a total floorspace of 28,000 sq ft. gross. These are Poundworld and Fit4Less Gym. Any additional investment would clearly benefit the centre, and therefore opportunities to accommodate the identified demand should be assessed as a priority.

Prime Zone A Rents

- 8.52 We are advised by our in house agents that Prime Zone A Rents in Bletchley are between £16 and £28 per sq ft. **Table 15 of Appendix 5** compares Prime Zone A rents achieved in Bletchley Centre at 2016 with other centres of similar role and function.

Household Survey

- 8.53 We have drawn on the findings of the household telephone interview survey (HTIS) to help gauge customers' views and perceptions of the town centre as a place to shop and visit for a range of leisure uses and other activities.
- 8.54 The majority of respondents across the entire Study Area (64.8%) indicated that they never visit Bletchley for shopping and other town centre uses. Approximately 6.7% visit three-four times per year, 6.5% visit monthly, 6.0% visit one day a week, 2.8% visit every two weeks and 2.0% visit 2-3 days a week. Only 0.2% visit daily.

- 8.55 The household telephone interview survey asked specific questions on respondents' views and perceptions of Bletchley. The survey results showed that respondents mainly liked the following features of Bletchley:

Table 9.2 Key factors respondents liked about Bletchley

Response	Total Catchment Area
Nothing/very little	25.8%
Good range of independent shops	13.5%
Close to home	13.2%
Good range of non-food shops	10.5%
Easy to park	7.7%
Good range of 'high street' retailers/multiples	7.9%

Source: HTIS 2017

- 8.56 As **Table 9.2** shows, a high number of respondents (25.8%) stated that they did not like the centre however this response was also common to the other centres. Key factors respondents claimed they like about the centre include the good range of non-food shops, particularly the independent shops. A slightly lower proportion of respondents also like the range of high street multiples. These responses are in line with the results of the health check which found that there was a complementary mix of independent and high street stores. Approximately 7.7% of respondents also like that it is easy to park in Bletchley.

- 8.57 Respondents were also asked what, if anything, they would improve in the town centre that might encourage them to visit more. The most frequent suggestions are as follows:

Table 9.3 Key Improvements for Bletchley

Response	Total Catchment Area
Nothing	54.1%
Don't know	19.7%
More national multiple shops/high street shops	5.5%
More/better parking	5.3%
More independent shops	4.1%
More/better comparison retailers	3.6%

Source: HTIS 2017

- 8.58 As **Table 9.3** shows, the majority of overall respondents appear to be happy with the town centre as 54.1% stated they would not change anything within the centre. One of the most frequently suggested improvements to the town centre includes parking which is a common response. Additional responses include more national multiple shops, more independent shops and better comparison retailers in general.

Environmental Quality

- 8.59 Although the centre is generally clean and tidy throughout, the majority of buildings are not considered to be of any significant architectural merit. There are a number of units that appear to be run down and in need of façade improvement. The centre benefits from some street furniture, and street lighting and litter bins are

distributed across the centre. However many items would benefit from an upgrade and better management. Generally we consider that the quality of the overall environment is relatively humble and is in need of improvement. It is considered that the centre could benefit from public realm enhancement works, and other measures that would add to character and improve identity.

- 8.60 The Brunel Centre is a 1970s shopping centre clad with dark glass panels and featuring a central mall. It is now looking “tired” and very dated in design with limited active frontages. Its positioning, together with the vacant Coop unit, creates an impediment to pedestrian movement and detracts from legibility and the overall sense of place. It hence detracts from the overall environment. We consider that upgrading the centre would be of great benefit to the centre. Its reconfiguration would be especially advantageous, as it would improve linkages with the railway station, creating a gateway into the centre, and the overall appearance of that part of the centre.

Accessibility

- 8.61 Bletchley District Centre benefits from good accessibility. The centre takes a linear form centred on a largely pedestrianised commercial core to Queensway. At its western end are the Brunel Shopping Centre and the Bletchley Bus Station.
- 8.62 Bletchley train station to the west is in close proximity to the town centre and provides regular services to CMK, Wolverton and other destinations on the West Coast Mainline. The reopening of East-West Rail services through Bletchley from 2023 will further improve Bletchley’s accessibility by rail.
- 8.63 Pedestrian links between the station and the town centre are in the process of being improved as part of the ‘Fixing the Links’ project. It is however considered that the positioning / layout of the Brunel Centre restricts legibility, and does not encourage pedestrian flow.
- 8.64 Bletchley town centre is accessible from a number of main roads, principally Saxon Street and Princes Way. It appears to be provided with adequate levels of car parking that is concentrated to the north west of the centre. There is another main car park adjacent to Elizabeth Square and some on-street parking throughout the centre.
- 8.65 It is also considered that the centre could improve the connection and linkages to the Leisure Centre, as this facility is currently “hidden” from the main shopping area.

Out of Centre Provision

- 8.66 There are a number of out-of-centre provisions around Bletchley, namely:
- 8.67 Denbigh North is a prominent out of centre retailing area. MK1 Shopping & Leisure Park is located just to the south of central Milton Keynes, adjacent to a major roundabout intersection of the A5 dual carriageway, in close proximity to the Milton Keys Dons Stadium. Tenants are primarily within the fashion goods category (such as H&M, Next, River Island, Outfit, New Look, Primark), and associated restaurants (such as Chimichanga, Prezzo, Nando's, Pizza Express, Frankie & Benny's, Bella Italia, TGI Friday's, McDonald's and KFC). Odeon cinema is also present. Neighbouring occupiers include Ikea, B&Q, and Asda.
- 8.68 Beacon Retail Park is located just off Watling Street, approximately 3.5 miles south east of Milton Keynes City Centre. The location is highly accessible via car, positioned within close proximity to the A5 and circa 5.5 miles from Junction 14 of the M1. The scheme’s tenants include TK Maxx, Boots, Brantano, Sports Direct, Argos and Pets at Home. Rushmere Retail Park hosts two units let to Wickes and Halfords, and is adjacent to Beacon Retail Park. On the other side of Watling Street are Tesco Extra, Matalan, and B&M Home Store.

New Investment & Potential Development

- 8.69 The Council has long standing aspirations to regenerate Bletchley town centre as articulated in the Local Plan and Core Strategy. This is a priority which is driven by the delivery of new housing, facilities and environmental improvements. As such Bletchley is recognised as one of the main areas in the where there, will be a significant amount of new development and/or change (see Policy CS8). The Plan: MK Topic Paper - Town Centres and Retail (October 2017) highlights that the fruition of the regeneration has been slow-coming as the process has been dependent on partners such as developers (rather than being Council-led) partly because of the slowdown in economic activity caused by the recession and the need for land assembly. The process will require dedicated resources from MKC (see para 65).
- 8.70 There are a number of regeneration interventions under way including:
- The Bletchley ‘Fixing the Links’ project is about improving linkages between Bletchley railway station and the town centre, which has received funding from the Government,
 - The reopening of East-West Rail services through Bletchley from 2023 will improve Bletchley’s accessibility.
- 8.71 The emerging Plan: MK sets out that in regards to Bletchley town centre the Council will seek to build on the opportunities created by east-west rail and the work undertaken for the Bletchley ‘Fixing the Links’ project by developing a new Master Plan for the development of sites around Bletchley town centre. New shops, services and facilities will be provided to serve the population of proposed new residential areas identified in Plan: MK. We consider this integral to Bletchley’s future.
- 8.72 From our site visit it was clear that there is a strong need to link the retail provisions with the railway station. We consider that the redevelopment and the reconfiguration of the Brunel Shopping Centre and the vacant former Coop unit should be a priority. This could deliver both the needed public realm improvements, and attract retailers that are more prominent and that would raise Bletchley’s profile.
- 8.73 We considered that a production of a Bletchley Urban Design Framework to tackle the identified issues would be a great benefit to the centre. The Council is now in the early stages of producing such a document. Policy SD19 in the proposed submission version of Plan:MK identifies the principles for development within the defined Central Bletchley Urban Design Framework Area.

Summary

- 8.74 In summary, Bletchley appears to be performing relatively well given its role and function as the District’s centre in the retail hierarchy. It predominantly meets the food shopping, service and wider needs of the immediate local catchment population. Some of the key findings of the health check are as follows:
- Bletchley has a relatively good provision and mix of food and convenience stores. Bletchley hosts a large Sainsbury’s foodstore, as well as Lidl and Iceland in the north of the Centre. This offer should be maintained and enhanced where possible. It is noted however that Lidl currently has a poor relationship with the rest of the centre, segregated by non-town centre uses.
 - The town’s comparison provision is mainly value-led and hence there could be scope for improving the quality and range of the centres offer, subject to market demand.
 - An above average number of services are present in the centre, which is consistent with its role and function.

- There is a low vacancy rate, and there are retailers seeking representation in the centre (albeit both are of the budget category). The vacant former Coop building and the Agora shopping centre are in need of investment.
- It would appear that the town lacks character, and does not have a good sense of identity.
- The centre could benefit from public realm improvements.
- It appears that there is currently a missed opportunity to capitalise on the visitors generated by Bletchley Park. In addition the centre could benefit from better marketing.
- The market does not appear to be functioning to its full potential, and efforts should be made to bring it into prosperity through more proactive management and marketing.
- The redevelopment of the Brunel Centre as a gateway development should be a priority for the centre.
- The Council has long standing aspirations to regenerate Bletchley town centre as articulated in the Local Plan and Core Strategy. This is a priority which is driven by the delivery of new housing, facilities and environmental improvements. We considered that a production of a Bletchley Master Plan to tackle the identified issues would be a great benefit to the centre. The Council is now in the early stages of producing such a document.

9 WOLVERTON DISTRICT CENTRE – HEALTH CHECK ASSESSMENT

Context

- 9.1 Wolverton is designated as a District Centre within the retail hierarchy. As defined with the Milton Keynes Core Strategy (2013), District Centres cater for the weekly convenience shopping needs of their catchment population.
- 9.2 The District Centre is situated just under four miles to the northwest of Milton Keynes town centre. It is a smaller District Centre than Bletchley. In the 2017 Javelin VenueScore retail rankings, Wolverton is ranked in 2,021st position. This represents a decline since the previous retail study (2010) when the centre was ranked 1,535th.
- 9.3 There are four main shopping areas in the centre; the centre boundary includes 'The Square' which is surrounded by two rows of shops, the Agora Centre which is a small 1970s shopping centre and a parade of shops located along Church Street and the adjacent Stratford Road. Tesco supermarket is situated to the north of Stratford Road and there are a row of large convenience goods units to the east of Creed Street.

Retail Composition & Diversity of Uses

- 9.4 The most recent Goad survey is dated August 2015. The centre's primary frontage (as shown on the Proposals Map) includes the Agora Centre, the northern frontage of Church Street between Maisies and the unit to the west of the church and the southern frontage along Stratford Road between the convenience store situated on the corner of Stratford Road and Radcliffe Street and the restaurant on the corner of Stratford Road and Creed Street. It should be noted that the units along The Square are not included within the primary shopping frontage.
- 9.5 **Table 10.1** below summarises the composition of the centre's retail and service uses in terms of the number of units and **Table 3 of Appendix 6** summarises composition in terms of floorspace. The mix and diversity of uses are reviewed in more detail below.

Table 10.1 Current Retail and Service Offer - Units

Category	Number of Outlets	% of Total Outlets	UK (%)	Index
Comparison	16	21.1%	31.6%	67
Convenience	10	13.2%	8.7%	151
Retail Service	13	17.1%	14.2%	121
Leisure Service	24	31.6%	23.6%	134
Financial & Business Service	5	6.6%	10.5%	63
Vacant	8	10.5%	11.2%	94
Other Retail	0	0.0%	0.1%	0
TOTAL	76	100.0%	100%	

Source: Experian Goad Category Report (2015). Figures may not sum due to rounding.

Convenience Offer

- 9.6 Wolverton District Centre has a strong convenience provision. This offer is anchored by Tesco situated to the north of Stratford Road. Other key retailers include Asda and Farmfoods situated to the east of Creed Street, Co-op located at the Agora Centre and Premier situated on Church Street. This provision is supported by a butcher, fishmonger, health food store, and a grocer/delicatessen. It should be noted that the Co-op situated at the Agora Centre is due to close in April 2017. In September 2016 an application was approved for the erection of a new food store (2,478 sqm GIA) at the existing Wolverton Works site (ref: 16/00360/FUL). This new unit will be occupied by discount food operator Lidl and is expected to be open by Christmas 2017.

Comparison Offer

- 9.7 Wolverton District Centre has a significant lack of comparison goods stores (21% compared to a national average of 32%). Only a few categories of goods are represented in the centre, these include: a charity shop, clothing, a florist, a phone store, textiles store, toiletries/cosmetic store and a toy shop. There are no antique shops, art shops, chemists, DIY stores, footwear, hardware/household goods or newsagents/stationers represented in the centre. There is no department store although this is expected considering the small size of the centre. There is also a distinct lack of clothing stores, particularly men's wear.
- 9.8 The Agora Centre is situated at the heart of the centre. It has around 12 units currently open, mainly situated around the outside of the centre, accessed via an outside staircase. Inside, there is one large store selling mainly bric-a-brac items whilst the majority of the other units (upstairs and downstairs) are vacant. A planning application was approved (ref: 15/00913/FUL) in March 2016 for the demolition of the existing building and mixed-use development comprising 100 residential units and 8 x ground floor retail units. We understand that the developer has since pulled out of this scheme therefore the future of the centre is unknown.
- 9.9 Overall the quality of the comparison provision is poor, particularly within the Agora Centre, and as such, the town centre is failing to attract visitors from outside of Wolverton.

Service Offer

- 9.10 Service businesses are defined by Experian Goad as including retail, professional and financial services. As **Table 10.1** shows, there are a total of 42 service outlets in Wolverton District Centre. The following provides a brief summary of provision in the different service categories:
- There are 13 **retail services**, which represents 17.1% of total outlets. This is above the national average of 14.2%. Similarly to the other centres in the area, this category is mostly made up of health and beauty outlets as there are nine units in this category. There is also a launderette/dry cleaners, petrol filling station and post office. However, we understand that the post office is soon due to close.
 - There is a substantial under provision of **financial services**. There are only five units in the centre which is equivalent to 6.6% of total units; this is below the national average of 10.5%. There is currently just one retail bank located in the centre (Lloyds), meaning that much of the local population will have to travel elsewhere for these services. We understand that Lloyds is currently at risk of closure; this would mean that residents would have to travel to Bradwell (around 2.6 miles away) to access banking services.
 - Although there are 24 **leisure service** outlets, which proportionately is above the national average (32% compared to 24%), the majority of these consist of fast food takeaways (approximately 13% which is more than double the national average). There are five restaurants and three cafes in the centre and all are owned by independent operators. The proportion of cafés and bars is below the national average; attracting more leisure operators to the centre could help to increase dwell times within the centre. There are also two betting offices in the town centre. Milton Keynes Museum is situated outside of Wolverton town centre to the south.

Vacancies

- 9.11 As **Table 10.1** shows, the proportion of vacant outlets in Wolverton District Centre, as recorded by Goad in August 2015, is 10.5% which is in line with the national average. At the time of the Goad report there were eight vacant units. This is one of the highest vacancy rates in the Council area. Although it is in line with the national average, it suggests that Wolverton is not performing as well as some other centres within the Council area.

- 9.12 During our site visit we noted that the largest concentration of vacancies was in the Agora Centre. The centre has very few occupants and considering the large area of space it occupies, it adds little to the town centre offer. There were also a number of vacant units situated opposite the Tesco store on Stratford Road.

Multiple and Independent Retail Representation

- 9.13 As shown in **Table 4 of Appendix 6**, there are very few national multiples occupying units in Wolverton District Centre. Those located in the centre include Boots and Tesco. The Co-op store situated in the Agora Centre is due to close soon.
- 9.14 The centre is characterised by independent retailing however we consider that unlike nearby Stony Stratford, the goods sold are of a relatively poor quality and do not attract visitors from outside of the District Centre.

Markets

- 9.15 A market operated by the Agora Centre takes place in the shopping centre car park every Friday. The market is small with around only 10-12 stalls which sell mainly fruit and vegetables and bric-a-brac. There is also a farmers market held on the first and third Saturday of every month outside of the Town Hall. We understand that the market attracts mainly residents living in Wolverton.

Retailer Demand & Requirements

- 9.16 **Table 14 of Appendix 6** summarises retailer demand and requirements. There is only one retailer requirement for Wolverton District Centre. This is from Savers, a health and beauty discount chain who are seeking a unit between 2,000 sq ft. and 3,500 sq ft.

Prime Zone A Rents

- 9.17 Evidence from our in house agents indicate that prime Zone A rents in Wolverton stand at around £11-16 per sq ft. **Table 15 of Appendix 6** compares Prime Zone A rents achieved in Wolverton District Centre at 2016 with other centres of similar role and function.

Household Survey

- 9.18 We have drawn on the findings of the household telephone interview survey (HTIS) to help gauge customers' views and perceptions of the town centre as a place to shop and visit for a range of leisure uses and other activities.
- 9.19 The majority of respondents across the entire Study Area (83.0%) indicated that they never visit Wolverton for shopping and other town centre uses. Approximately 3.5% visit one day a week, 2.9% visit three-four times a year, 2.2% visit monthly and 1.9% visit once a year.
- 9.20 The household telephone interview survey asked specific questions on respondents' views and perceptions of Wolverton. The survey results showed that respondents mainly liked the following features of Wolverton:

Table 10.2: Key Factors Respondents Liked About Wolverton

Response	Total Catchment Area
Nothing/very little	24.0%
Close to home	15.4%
Tesco store	11.3%
Good range of independent shops	10.7%
Don't know	10.3%
Good food stores	8.9%

Source: HTIS 2017

9.21 As **Table 10.2** shows, similarly to the other centres within the Council boundary, a high number of respondents (23.98%) stated that they did not like anything about the town centre. Key factors respondents claimed they like about the centre include its proximity to their home and the range of food stores, specifically Tesco. Respondents also like the range of independent stores; the large provision of independents was identified in the District Centre health check and site visit.

9.22 Respondents were also asked what, if anything, they would improve in the District Centre that might encourage them to visit more. The most frequent suggestions are as follows:

Table 10.3 Key Improvements for Wolverton

Response	Total Catchment Area
Nothing	62.8%
Don't know	26.1%
More national multiple shops/ high street shops	2.2%
More/better comparison retailers	1.7%
More independent shops	1.6%
Needs a revamp	1.6%

Source: HTIS 2017

9.23 As **Table 10.3** shows, approximately 62.8% claimed that there are no improvements needed for Wolverton District Centre however this response has been common across all of the centre surveys. The most frequently suggested improvements to the town centre include parking and more comparison retailers, including a mix of both independents and national multiples. Respondents also thought the centre as a whole could benefit from a 'revamp'.

Environmental Quality

9.24 Wolverton's environmental quality is in need of improvement. The District Centre is situated within an area of dense residential development consisting of Victorian terraces. The centre is dominated by the large 1970s red brick Agora Shopping Centre, the architectural design of which is out of character with the surrounding terraces. The car park to the east of the building also does little to contribute to the character of the town centre due to the large area of empty space facing onto Church Street.

- 9.25 Sitting to the rear, The Square is severed from the rest of the town centre by the Agora Shopping Centre. The Square is surrounded by shops with residential accommodation above. It is somewhat hidden behind the shopping centre and better linkages and views to the area must be encouraged alongside the redevelopment of the Agora Centre. Despite being disconnected from the centre, this area is well maintained. The attractive public space is used for community events including an annual lantern festival held during winter. There is an abundance of seating, bike racks and tree planting and a large space for events and performances.
- 9.26 Many of the shop fronts along Stratford Road and Church Street would benefit from repair and modernisation as they currently appear outdated. The frontages of the convenience retail units located along Creed Street could also be improved, particularly as this road is one of the main gateways into the town centre. The District Centre is situated within a conservation area but the shop fronts are not sensitive to this.
- 9.27 Although situated just outside of the centre boundary, the Secret Garden is an area of green open space which was once derelict land located to the west of the railway line and river on Stratford Road. It was transformed by members of the community and is now a key asset of the centre.
- 9.28 In January 2017 an interactive town trail app was launched to guide visitors around historic sites and landmarks.

Accessibility & Pedestrian Flows

- 9.29 The centre is easily accessible by car with the A5 running to the southwest of the District Centre. The centre is around a ten minute drive from Central Milton Keynes.
- 9.30 Wolverton railway station is located to the northeast of the District Centre and is just a ten minute walk to the Agora Shopping Centre. However, we consider that connections between the centre and the station could be improved; Stratford Road is busy and the relatively narrow pavements do not create a pleasant pedestrian environment.
- 9.31 There are a number of services regularly operating to and from Wolverton town centre, including Central Milton Keynes. Buses stop along Church Street, around the Agora Centre. This is also where the centre's main car park is located meaning there are high levels of pedestrian activity around this area in comparison to other areas of the centre such as The Square.
- 9.32 We understand that all car parks within the town centre reach full capacity during weekends. At the time of our visit the car park on Creed Street (to the front of Asda and Farmfoods) and the Agora Centre car park were nearly full. Parking in the centre is free. This should be maintained as introducing a charge could further encourage residents to travel elsewhere.
- 9.33 Stratford Road and Creed Street are main roads making them more difficult to navigate by pedestrians than Church Street. There are a lack of crossings on Church Street and Creed Street; this makes crossing to the Asda and Farmfood stores on Creed Street difficult. Introducing a crossing here could help to benefit pedestrian accessibility in the centre. Crossing to the Secret Garden along Stratford Road is also difficult as there is only one crossing on the bridge.
- 9.34 Despite the District Centre being relatively compact, the main retail areas are fairly disjointed with the Agora Centre severing the units located around The Square from the rest of the centre. Although pedestrians can move between the two areas via a walkway to the side of the shopping centre, this route is not clearly signposted. Church Street and Stratford Ford are similarly disconnected as well as the convenience goods units on Creed Street.

Out of Centre Provision

9.35 There is no out of centre provision in Wolverton.

New Investment & Potential Development

9.36 The large Wolverton Works (adjacent to the current town centre boundary), situated to the north and west of the Tesco site, is proposed for redevelopment. In 2015 an outline application (ref: 15/02030/OUTEIS) was submitted for the demolition of existing structures, new employment floorspace (use classes B1/B2/B8), up to 375 residential units, a new foodstore, a new community facility, new hard and soft landscaping, open space and public realm. The proposals seek to provide up to circa 600 jobs within the works in addition to 40 jobs created by the proposed food store. At present, the application is still awaiting a decision. In February 2016 a separate application (ref: 16/00360/FUL) was made for the erection of the foodstore (2,478 sqm GIA) which formed part of the wider application above. This was approved in September 2016 for a new unit to be occupied by discount food operator Lidl.

9.37 In March 2016 permission was approved for the demolition of the existing Agora building (ref: 15/00913/FUL). The scheme proposes a mixed use development comprising 100 residential units and eight retail units with storage (3276 sqm) located throughout six different blocks to improve access throughout the town centre. We are aware that the developer has now pulled out of this scheme therefore the prospects of the redevelopment of the Agora Centre is currently unknown.

Summary

9.38 In summary, Wolverton is a declining town centre. With the relatively high vacancy rate, the recent loss of key town centre uses (including the Co-op and Post Office) and lack of comparison provision, we consider that there is potential for the health of Wolverton to further decline. The key findings are summarised below:

- Wolverton has a significantly strong convenience goods provision. There are two large supermarkets (Asda and Tesco). Discount retailer Lidl has also been granted permission for a new store in the town. The centre has, however, little comparison goods representation, particularly in terms of clothing stores. There are no national multiples and the comparison goods retail that is available is of a lower quality.
- There is a good provision of retail services within the centre. This includes hairdressers, beauty salons, launderette/dry cleaners and petrol filling station. Despite this, there is a shortage of financial services located in the centre. With only one retail bank in the centre (which may soon shut), the centre is not catering for the needs of its local population in this respect.
- Furthermore, although proportionately the leisure offer is above the national average, the quality of this leisure provision is relatively poor. There is an overrepresentation of takeaways but a shortage of cafes which are considered to be more desirable to help increase dwell times within the centre and encourage activity during the day time. Increasing the number of bars and restaurants could also help to encourage a stronger night time economy.
- The Agora Centre is considered to be in need of redevelopment. It currently severs the units around The Square from the rest of the town centre, contributes little to the retail and leisure offer of the District Centre and the design is considered to be of little asset to the surrounding area. Redevelopment proposals for various sites across the centre are coming forward, including the Agora Centre and the Wolverton Works. These proposals reflect a drive for new investment in the town centre, and provide potential for the improvement and growth of Wolverton as a retail and leisure destination.
- The Square is considered to be a good area of public open space. The quality of the public realm in this area is good with a large space available to accommodate for events.

- Despite the District Centre being relatively compact, the main retail areas are fairly disjointed and hence accessibility and legibility throughout the centre need to be improved. This could be aided through the reconfiguration of the Agora Centre
- It is considered that the centre could benefit from a comprehensive Master Plan to guide its regeneration in the future.

10 NEWPORT PAGNELL TOWN CENTRE – HEALTH CHECK ASSESSMENT

Context

- 10.1 Newport Pagnell is a historic market town located just under five miles north of Milton Keynes, separated by the M1. It is designated as a town centre in the Milton Keynes retail hierarchy.
- 10.2 Newport Pagnell is a traditional town centre with retail and town centre uses focused along the High Street as well as St John Street which is occupied by predominately secondary uses. Tickford Arcade is a small shopping arcade situated off St John Street. There is a strong concentration of units located around the junction of these two roads.
- 10.3 The centre's primary frontage (as shown on the Proposals Map) includes the length of the High Street between the medical centre to the western end of the street and St Peter and St Paul Church at the eastern end of the centre where the High Street bends to the north.

Retail Composition & Diversity of Uses

- 10.4 The most recent Goad survey is dated August 2015.
- 10.5 **Table 11.1** summarises the composition of the centre's retail and service use in terms of the number of units, and **Table 3** of **Appendix 7** summarises the use in terms of floorspace.

Table 11.1: Current Retail and Service Offer - Outlets

Category	Number of Outlets	% of Total Outlets	UK (%)	Index
Comparison	35	26.9%	31.6%	85
Convenience	12	9.2%	8.7%	106
Retail Service	24	18.5%	14.2%	130
Leisure Service	33	25.4%	23.6%	108
Financial & Business Service	21	16.2%	10.5%	154
Vacant	5	3.8%	11.2%	34
Other Retail	0	0.0%	0.1%	0
TOTAL	130	100.0%	100%	

Source: Experian Goad Category Report (2015). Figures may not sum due to rounding.

Convenience Offer

- 10.6 Newport Pagnell's convenience goods offer (12 stores) is in line with the national average. However the proportion of convenience goods floorspace is below the national average. There are two Co-op stores located in close proximity to one another on opposite sides of the street. These are the main convenience goods stores in the centre. They are supported by a Martin's newsagents. All three of these stores are located along the High Street. Natural Lifestyles is a health store located in the centre. Additional provision includes three bakers/confectioners, one butchers and one greengrocers.

Comparison Offer

- 10.7 There are approximately 35 comparison goods stores operating in the town centre. The proportion of units in this use (26.9%) is below the national average (31.6%).

- 10.8 The majority of units are occupied by independents. Categories represented in the centre include antiques, art, clothing, crafts/gifts, florists, electricals, hardware/household goods, jewellery, textiles and toiletries. There is an overrepresentation of charity shops (4.6% compared to the national average of 2.7%) and a lack of clothing stores, particularly menswear. On the day of our site visit, we noted that there were a high number of electronic cigarette shops.
- 10.9 Although a similar size to Stony Stratford, the quality of the comparison retail within the town centre is considered to be lower.

Service Offer

- 10.10 Service businesses are defined by Experian Goad as including retail, professional and financial services. As **Table 11.1** shows, there are a total of 78 service outlets in Newport Pagnell Town Centre. The following provides a brief summary of provision in the different service categories:
- There are 24 retail services, which represents 18.5% of total outlets. This is above the national average of 14.2%. This category is mostly made up of health and beauty outlets. There are 16 units in this category. This is equivalent to 12.3% of units which is above the average of 8.7%. Provision also includes two opticians, two dry cleaners/laundrette, one post office and one travel agent.
 - In terms of financial services, there are 21 outlets, which represents 16.2% of total units which is above the national average of 10.5%. The Goad report shows that financial services include three retail banks, one building society, three financial services and nine property services (including estate agents). Following the Goad survey and our March 2017 site visit, we understand that there are now only two banks and one building society in the centre (Lloyds, Barclays and Nationwide) however we understand that Barclays is due to close shortly.
 - There were 33 leisure service outlets; this is equivalent to 25.4% of total units, which is just above the national average of 23.6%. Leisure provision includes six cafes, two betting offices, nine takeaways, five public houses and seven restaurants. Food and beverage provision is characterised by independent operators although there is a Papa Johns Pizza takeaway located in the centre. There are no bars/wine bars.

Vacancies

- 10.11 As **Table 11.1** shows there were five vacant units recorded by Goad. This is equivalent to some 3.8% which is significantly below the national average of 11.2%.
- 10.12 During our site visit we noted that there is a large vacant unit situated on the corner of St John Street and High Street which was formally occupied by HSBC. We also identified one vacant unit in Tickford Arcade. Overall, we consider that the centre is performing very well in terms of vacancy levels.

Multiple and Independent Retail Representation

- 10.13 As shown in **Table 4** of **Appendix 7**, the centre is occupied by predominately independent retailers. Multiple retailers in the centre consist of health and beauty retailers, Boots and Superdrug. There are also a number of high street banks.

Markets

- 10.14 Newport Pagnell Farmer's Market is held on the third Friday of each month at Market Hill which is to the far west of High Street. This is held between 9am and 2pm. A variety of food products are sold. There are around 12-15 stalls.

Retailer Demand & Requirements

- 10.15 **Table 14 of Appendix 7** shows retailer demand and requirements. There is currently only one requirement for Newport Pagnell town centre. This is from 'Al's Beef', an Italian restaurant/café. They are looking to acquire a site between 1,000sq ft. and 2,000 sq ft. (Shop Property, 2016).

Prime Zone A Rents

- 10.16 Evidence from our in house agents indicate that prime Zone A rents in Newport Pagnell stand at around £19-23 per sq ft.
- 10.17 **Table 15 of Appendix 7** compares Prime Zone A rents achieved in Newport Pagnell at 2016 with other centres of similar role and function.

Environmental Quality

- 10.18 Similarly to Stony Stratford, Newport Pagnell benefits from a traditional, historic town centre environment.
- 10.19 Buildings are generally well-maintained throughout the town centre and the predominately Georgian architecture helps to create an appealing and pleasant environment. The majority of shop fronts are tidy and there are hanging baskets distributed along the High Street.
- 10.20 Tickford Arcade is a unique shopping arcade located on St John Street with an attractive façade. Other buildings of interest include St Peter and St Paul church and Swan Hotel.
- 10.21 There is a good provision of public seating, particularly along the High Street. There is no central area of green/community space to host community or pop up events although there is a wide area of pavement decorated with planting and seating to the front of The Dolphin public house and the medical centre.
- 10.22 The River Ouzel runs close to the town centre and access can be gained via St John Street.

Accessibility & Pedestrian Flows

- 10.23 Newport Pagnell is situated to the east of the M1 meaning the town centre is well linked to both the north and south of England. The main retail provision is located around the junction of St John Road and High Street which are two main routes through the town centre. Overall, the centre is easily accessible by car although the St Johns Street/High Street junction is heavily trafficked.
- 10.24 There is a short stay car park located just off St John Street and off the High Street on Queens Avenue to the west of the centre and to the rear of the medical centre. Parking is free of charge. The car parks were relatively full at the time of our visit to the town centre. There were also many cars parked along the High Street to the west of the St Johns Street junction.

10.25 There is no railway station located in the town centre. The nearest station is located at Milton Keynes. There are regular bus services to surrounding centres, including Central Milton Keynes. Buses can be caught from outside of the medical centre.

10.26 The centre is easily accessible for pedestrians. Pavements are wide throughout the centre and there are pedestrian crossings towards the eastern and western ends of the High Street. The addition of a new pedestrian crossing close to the roundabout at the junction of St John Street and High Street would also be beneficial to ensure pedestrian safety when crossing these roads.

Out of Centre Provision

10.27 There is no out of centre provision in Newport Pagnell.

New Investment & Potential Development

10.28 We are not aware of any new retail or leisure development coming forward in the town.

Summary

10.29 In summary, we consider Newport Pagnell to be a relatively healthy and viable centre. It is performing well against many of the health check key performance criteria. Its key role is to serve its local catchment, providing for immediate day-to-day needs in terms of goods and services.

10.30 The key findings are summarised below:

- Convenience goods provision is above the national average, and is appropriate for its role as a Local Centre. There are two Co-op stores which act as the centre's main convenience anchors.
- There is currently a weak comparison goods offer, with a weak representation of goods sold and an over provision of charity shops – we consider that there is scope for improvement in the diversity and quality of the comparison goods stores in the centre. Attracting better quality, independent retailers would be beneficial.
- Service provision, including leisure, retail and financial services, is generally strong. There are a range of retail services which cater for the local population alongside an adequate provision of retail banks for a centre of this size. There are also a range of restaurants and cafes in the centre. There are, however, no bars in the town centre. Attracting beverage operators to the town could help to enhance the centre's evening offer and encourage night time activity.
- Introducing a weekly street market could enhance the character of the centre.
- Newport Pagnell has a low vacancy rate with only five units currently empty (3.9%). This suggests that the town is healthy and performing well.
- The centre is of a high environmental quality. All buildings are well maintained and street furniture and planting is of a high standard; all these features help to create an appealing setting for visitors to the centre. Newport Pagnell, however, lacks any open community space. The creation of new open space to host community events could further enhance the centre.

- OLNEY TOWN CENTRE – HEALTH CHECK ASSESSMENT

Context

- 10.31 Olney Town Centre is a historic market town located approximately 12 miles from Northampton, Wellingborough, Bedford and Milton Keynes. It is designated as a Town Centre within the retail hierarchy and functions as a local shopping destination for the daily or specialist needs of its largely residential catchment population.
- 10.32 The centre sits within the Olney Conservation Area and its main retail frontages (as shown on the Proposals Map) includes the lengths of Market Place and Silver End. The town centre provides approximately 10.79 sqm of gross retail/service floorspace in 92 units (as per the August 2015 Goad Category Report) and is anchored by the Co-op.
- 10.33 The centre is characterised by a large number of independent retailers.

Retail Composition & Diversity of Uses

- 10.34 The most recent Experian Goad Category Report is dated August 2015.
- 10.35 **Table 12.1** below summarises the composition of the centre's retail and service uses, and the mix and diversity of uses are reviewed in more detail below.

Table 12.1 Current Retail and Service Offer – Outlets

Category	Number of Outlets	% of Total Outlets	UK (%)	Index
Comparison	42	45.7%	31.6%	145
Convenience	10	10.9%	8.7%	125
Retail Service	10	10.9%	14.2%	77
Leisure Service	17	18.5%	23.6%	78
Financial & Business Service	12	13.0%	10.5%	124
Vacant	1	1.1%	11.2%	10
Other Retail	0	0.0%	0.1%	0
TOTAL	92	100.0%	100%	

Notes: Based on the Experian Goad report for 2015. Figures may not fully add up to 100% due to rounding.

Convenience Offer

- 10.36 Olney Town Centre has a higher than average proportion of convenience goods units (10.9% compared to 8.7%). The proportion of convenience goods floorspace is also above the national average (17.8% compared to 15.2%). The centre's main convenience provision consists of the Tesco Express on Silver End and the Co-op on Stanley Court. This is supported by another multiple convenience store, Martin McColl's. There are also 2 bakeries, 2 grocers & delis, a butchers, and a greengrocers.
- 10.37 Whilst it is considered that the convenience offer of the centre is generally good, subject to market demand Olney could benefit from a larger supermarket to meet the needs of the local population.

Comparison Offer

- 10.38 There are 42 comparison goods retailers located in Olney town centre. The number of comparison goods units is significantly above the national average; although, the proportion of floorspace is broadly in line with the national average.

10.39 The centre is characterised by a large number of independent retailers, with only 16.3% of all units being occupied by multiple retailers. The low presence of national multiple operators does not however appear to harm the vitality and viability of the town centre. There are no department stores although this is expected for a centre of this size. A variety of comparison goods categories are represented in the centre including antiques shops, art & art dealers, carpets & flooring, charity shops, chemist & drugstores, clothing general, cycles & accessories, DIY & home improvement, florists, footwear, and greeting cards. It is noted that there is currently a significant overprovision of ladies wear units, and DIY & home improvement units.

Service Offer

10.40 Service businesses are defined by Experian Goad as including retail, professional and financial services. As **Table 12.1** shows, there are a total of 39 service outlets in Olney town centre. They account for less than half of all units. The following provides a brief summary of provision in the different service categories:

- There are 10 retail services, which represents 10.9% of total outlets. This is above the national average of 8.7%. This category is mostly made up of health and beauty outlets. There are 5 units in this category, equivalent to 5.4% of units, which is below the average of 8.7%. Provision also includes 2 drycleaners/laundrettes, an opticians, a post office, and a travel agents.
- In terms of financial services, there are 12 outlets, which represents 13.0% of total units, which is significantly above the national average of 10.5%. Financial services include 2 retail banks, 1 building society, and 5 property services. Banks in the centre include Natwest and Barclays.
- There are 17 leisure service outlets; this is equivalent to 18.5% of total units, which is significantly below the national average of 23.6%. Leisure provision includes 2 bars, 4 cafes, 4 fast-food outlets, 1 hotel/guesthouse, 2 public houses, and 4 restaurants. Costa is the only branded leisure operator in the centre.

10.41 Overall, we consider that Olney Town Centre has a good provision of retail and financial services. There could, however, be an opportunity to improve leisure provision through the introduction of more restaurants and public houses, which will also create a night time economy in the centre.

Vacancies

10.42 As Table 12.1 shows the number of vacant outlets in Olney town centre, is 1.1%, which is significantly below the national average of 11.2%. Overall, we consider that the centre is performing very well in terms of vacancy levels.

Multiple and Independent Retail Representation

10.43 The Goad survey identified that there are 15 multiple retailers in the surveyed area (see **Table 4 of Appendix 8**). This includes key names such as Tesco, Co-op and Costa.

10.44 The centre is defined, however, predominantly by the large number of independent retailers/ service providers; approximately 84% of occupants within the town centre are independents. The 77 providers include a number of independent food outlets, health and beauty retailers and fashion retailers. The independent stores and shops all contribute significantly to the overall diversity, vitality and viability of the town centre's offer.

10.45 In summary, it is considered that there is a good and complementary mix of multiple and independent retailers, serving the centre and its catchment population. The independent retailers seem to be providing quality goods and service and therefore appear to be performing well. Olney must seek to maintain and build on the independent offer, building on its niche market, in order to continue its success as a shopping, service and leisure destination.

Markets

- 10.46 There are two markets held in Olney.
- 10.47 A weekly market is held every Thursday from 8am to 3.30pm on Olney's Market Place. There is a wide range of stalls including clothing, flowers, meat, vegetables and household goods.
- 10.48 The Olney Farmers Market is held on the first Sunday in the month from 9am to 1pm on the Market Place. The Farmers Market has become a popular attraction both for local people and visitors looking to purchase a wide variety of locally sourced produce.

Retailer Demand & Requirements

- 10.49 **Table 14 of Appendix 8** sets out the retail requirements as listed by the Requirement List (April 2017) and Shop Property (April 2017). In summary, requirements are from McCarthy and Stone; and Aldi for a unit from 10,000 sq ft.

Prime Zone A Rents

- 10.50 Evidence from our CJ agent indicate that prime Zone A rents in Olney stand at around £33-44 per sq ft.
- 10.51 **Table 15 of Appendix 8** compares Prime Zone A rents achieved in Olney at 2016 with other centres of similar role and function.

Environmental Quality

- 10.52 Since Olney town centre sits within the Olney Conservation Area, it benefits from a vibrant and attractive shopping environment. It is a small, traditional, rural market town and the Georgian architecture contributes to the screen scene.
- 10.53 The well-kept, traditional shop fronts help to enhance the distinct character of the town centre. The few modern additions are sympathetic to the centre's established character.
- 10.54 Green open space within the town centre is limited, however street furniture and signage is abundant and of a high quality.
- 10.55 Overall, the Town Centre hosts an attractive environment, however we recommend improvements in the amount of green open space, in order to make it even more appealing.

Accessibility & Pedestrian Flows

- 10.56 Olney has relatively good road links; the A509 links the town with Milton Keynes, and the A428 provides links to Bedford. The town also has easy access to the M1 at Junction 14 (approximately 7 miles).
- 10.57 All car parking in the town centre is free. There are two long stay car parks: one located at Fountain Court, and the one at Olney Rugby Football Club. There is also a short stay car park located in close proximity to Market Place. Parking is also unrestricted along Olney High Street.

- 10.58 There is no railway station located in the town centre. The nearest stations are located at Milton Keynes and Bedford (each approximately 12 miles distant). There is a bus service, which operates between Olney and Milton Keynes every hour, and there are also bus services to other surrounding towns and villages.
- 10.59 The centre is relatively accessible for pedestrians since it is well integrated with surrounding residential areas. Pedestrian activity is centred on the Market Place and surrounding shops. The footfall on High Street becomes progressively lower as one travels north and residential uses increase. Furthermore, cycle parking is available to the north of the Market Place.

Out of Centre Provision

- 10.60 There are no out-of-centre provisions around Olney Town Centre.

New Investment & Potential Development

- 10.61 The Olney Neighbourhood Plan, which provides details of housing, employment and retail allocations, was adopted by Milton Keynes full Council on 19th July 2017. To meet the Core Strategy Housing requirements up to the end of the Neighbourhood Plan period in 2031, the Neighbourhood Plan allocates a total of 300 new dwellings across three preferred greenfield release sites as planned residential-led extensions to the town and settlement boundary (sites A, D and E on proposals map). The resultant increase in population will put pressure on the existing town centre provision, but will, nonetheless, also encourage new investment into the area.
- 10.62 In addition to the new housing proposed, the Neighbourhood Plan also allocates two sites (B and C on proposals map) as employment land. Site B is allocated for an employment led mixed use development, where proposals for B1 (business), B2 (industrial), and B8 (storage and distribution) will be allowed in conjunction with C1 (hotel), C2 (residential institutions) and D1 (non-residential institutions). Site C is allocated for employment uses falling within classes B1 (business), B2 (industrial) and B8 (storage and distribution). Such allocations are likely to encourage investment into the wider area, and Olney Town Centre as a result.
- 10.63 Site R has been allocated in the neighbourhood plan for the development of a food store and petrol filling station. The proposed foodstore has the potential to support the local shopping needs of the town and its rural catchment, and is well located close to new proposed housing. Such development, according to Milton Keynes Council, “*will not have a ‘significant adverse impact’ on the vitality and viability of Olney Town Centre*”²⁴

Summary

- 10.64 Based on our assessment, we consider Olney Town Centre to be a vital and viable centre that serves well its catchment population. The dominance of independent retailing give the centre the distinctive character, and should be maintained.
- 10.65 The centre has a strong mix of service and retail offer. Whilst comparison, convenience and financial service offer is above the national average, there is potential to improve the current leisure offer in the centre as these are below national averages. In terms of leisure offer, attracting more food and beverage operators to the centre could help to enhance the centre’s evening economy as well as increase the footfall of visitors during the day.

²⁴ See page 28 of Plan (2017)

- 10.66 Whilst it is considered that the convenience offer of the centre is generally good, subject to market demand Olney could benefit from a larger supermarket to meet the needs of the local population.
- 10.67 The centre's markets are highly regarded by the community and should be promoted further.
- 10.68 There is currently 1 vacant unit within the town centre. As such, the vacancy rate is therefore significantly below the national average of 11.2%. This furthermore suggests that Olney is currently performing well and is a healthy town centre.
- 10.69 The centre benefits from a pleasant environment. The Georgian architecture helps to create a vibrant and attractive environment, and all buildings are well maintained. Despite this, public open space is limited to areas on the fringe of the Market Place, and as such the centre could benefit from increasing such provision.
- 10.70 Free parking in the town centre is a key asset. The centre is also relatively assessable for pedestrians since it is well integrated with surrounding residential areas.

11 STONY STRATFORD TOWN CENTRE – HEALTH CHECK ASSESSMENT

Context

- 11.1 Stony Stratford town centre is located approximately 5.3 miles northwest of Milton Keynes. It is designated as a town centre within the retail hierarchy of the Milton Keynes Council meaning it functions primarily as a local shopping centre catering for daily or specialist shopping needs.
- 11.2 Stony Stratford is a small traditional market town characterised by Georgian and Victorian architecture which contributes to its picturesque and pleasant environment. The town centre is linear in nature with the majority of units located along the traditional High Street although there are a number of smaller arcades and walkways which are accessed from the main street. These include Cofferridge Close located at the southeast end of the High Street with a frontage on High Street backing onto Silver Street, Odells Yard located opposite the Church, Swinfens Yard situated at the end of the High Street to the southeast and Stratford Arcade situated to the northwest end of the street. The town centre provides approximately 20,801 sqm of gross retail/service floorspace in approximately 142 units as per the August 2015 Goad Category Report.

Retail Composition & Diversity of Uses

- 11.3 The most recent Goad survey is dated August 2015. The centre's primary frontage (as shown on the Proposals Map) includes the area between the High Street/Wolverton Road junction and the High Street/Church Street junction.
- 11.4 **Table 13.1** summarises the composition of the centre's retail and service uses in terms of the number of units, and **Table 3** of **Appendix 9** summarises the composition in terms of floorspace.

Table 13.1: Current Retail and Service Offer- Outlets

Category	Number of Outlets	% of Total Outlets	UK (%)	Index
Comparison	45	31.7%	31.6%	100
Convenience	13	9.2%	8.7%	105
Retail Service	30	21.1%	14.2%	149
Leisure Service	31	21.8%	23.6%	93
Financial & Business Service	15	10.6%	10.5%	101
Vacant	8	5.6%	11.2%	50
Other Retail	0	0.0%	0.1%	0
TOTAL	142	100.0%	100%	

Source: Experian Goad Category Report (2015)

Convenience Offer

- 11.5 Stony Stratford town centre's convenience provision is in line with the national average. Budgens is the centre's main convenience store. This is supported by other multiple convenience stores including McColls and Londis. There is also a butchers and bakery. We consider that there is potential for a major retailer to locate to the town centre if the demand exists.
- 11.6 At the time of our site visit Budgens appeared to be busy.

Comparison Offer

- 11.7 There are approximately 45 comparison goods retailers located in Stony Stratford town centre. The number of comparison goods units is in line with the national average however the proportion of floorspace in this use is below average.
- 11.8 The centre is characterised by independent retailers with Boots being the only multiple comparison retailer located in the centre. There are no department stores although this was expected for a centre of this size. A variety of comparison goods categories are represented in the centre including art shops, books, carpets, charity shops, chemists, clothing, crafts/gifts, DIY, electricals, florist, footwear and homewear. It is noted that there is currently a slight overprovision of charity shops; there are currently five within the centre which is equivalent to 3.5% of total units compared to the national average of 2.7%.
- 11.9 Odell's Yard contains a unique collection of shops, including Odells Ironmongers, which has been operating within the centre for the past 250 years.

Service Offer

- 11.10 Service businesses are defined by Experian Goad as including retail, professional and financial services. As **Table 13.1** shows, there are a total of 76 service outlets in Stony Stratford Town Centre. They account for over half of all units. The following provides a brief summary of provision in the different service categories:
- There are 30 **retail services**, which represents 21.1% of total outlets. This is significantly above the national average of 14.2%. This category is mostly made up of health and beauty outlets. There are 20 units in this category which is equivalent to 14.1% of units which is above the average of 8.7%. Provision also includes an opticians, dry cleaners/laundrette, post office and petrol filling station.
 - In terms of **financial services**, there are 15 outlets, which represents 10.6% of total units which is in line with the national average of 10.5%. Financial services include three retail banks, one building society and six property services (including estate agents). Banks in the centre include Lloyds, Nationwide and Natwest.
 - There were 31 **leisure service** outlets in 2015; this is equivalent to 21.8% of total units, which is just below the national average of 23.6%. Leisure provision includes 2 bars, 6 cafes, 5 takeaways, 8 restaurants, 6 pubs and 2 hotels. Costa is the only branded leisure operator in the centre. We consider leisure provision to be good.

Vacancies

- 11.11 **Table 13.1** shows the proportion of vacant outlets in Stony Stratford town centre, is some 5.6% which is significantly below the national average of 11.2%. At the time of the Goad report, there were eight vacant units.
- 11.12 During our site visit we noted that there were no concentrations of vacancies in the town centre. However, there was a large vacant office building located in Cofferridge Close as well as a pink residential building situated on the High Street (no. 28); both appeared to be poorly kept. There is a vacant unit located next to the Stratford Arcade as a result of a fire which occurred in 2016.
- 11.13 Overall, we consider that the centre is performing very well in terms of vacancy levels.

Multiple and Independent Retail Representation

- 11.14 The centre is occupied by mainly independent retailers as shown in **Table 4** of **Appendix 9**. There is little representation of the top 60 retail, leisure and service operators that, in our judgement, are most likely to anchor

a town centres offer; Boots is the only comparison goods retailer in this list. Other multiples include Budgens, McColls, Londis, Costa and Natwest.

- 11.15 We consider that there could be potential for a multiple clothing retailer however the strong independent offer is a quality which has allowed Stony Stratford to maintain its individual identity.

Markets

- 11.16 Stony Stratford Farmers' Market is held on the last Friday of every month in the Market Square. This is held between 9am and 1pm. Products sold include pies, chutneys, bread, cakes, eggs, seasonal fruit and vegetables and meat and poultry. There are only a small number of stalls (around 6-10) however we understand that it is popular and there is potential for expansion.
- 11.17 There is a market held in Odell's Yard held on Saturdays. This is also small in size with around six stalls selling mainly food products. An additional Saturday market takes place in Timor Court, a small shopping courtyard. This is the larger of the two markets.

Retailer Demand & Requirements

- 11.18 There are only two requirements listed by the *Requirement List* (March 2017) and *Shop Property* (March 2017) as shown in **Table 14** of **Appendix 9**. Both of these come from retailers specialising in health and beauty goods - Savers and Superdrug. These retailers are requiring a maximum floorspace of 5,500 sq ft. (Superdrug) and 3,500 sq ft. (Savers).

Prime Zone A Rents

- 11.19 Prime Zone A rents in Stony Stratford stand at around £23-35 per sq ft. **Table 15** of **Appendix 9** compares Prime Zone A rents achieved in Stony Stratford at 2016 with other centres of similar role and function.

Environmental Quality

- 11.20 Stony Stratford town centre benefits from an attractive and pleasant environment. It is a small traditional market town with a mix of Georgian and Victorian architecture, which complements the traditional nature of the centre.
- 11.21 Well-kept shop fronts, planting (including hanging baskets and traditional hanging signage) all help to enhance the distinct character of the town centre.
- 11.22 There are a number of alleyways and courtyards which lead off from the main High Street including Swinfen's Yard and Stratford Arcade. These features add interest to the main street, further contributing to the overall character of the centre. The appearance of the arcades are all fitting with the traditional character of the centre. The Market Square is an attractive space lined with trees and character buildings including The Crown public house. St Mary and St Giles Church located on the corner of the High Street/Church Street is also a key asset to the centre.
- 11.23 All buildings are well maintained and there are no concentrations of vacant units. Despite the majority of the buildings along the High Street contributing to the attractive environment of the town centre, the modern redbrick Coffridge Close development which is occupied by retailers including Budgens, does little to preserve the traditional nature of the centre. The building appears bulky in comparison to the surrounding units.

- 11.24 The centre has a good supply of information boards providing facts about the history of Stony Stratford located around the centre. The historic church tower situated to the northwest of the centre could be better promoted.
- 11.25 There is a lack of public seating and green space in the centre.

Accessibility & Pedestrian Flows

- 11.26 Stony Stratford has relatively good road links; the A5 provides links to Milton Keynes and the A508 links to Northampton.
- 11.27 All parking in the centre is free; we consider this is to be a positive feature of the town which could help the centre to retain existing visitors. There are a total of seven car parks. The largest car park is to the rear of 'The Cock' public house, just behind the High Street. There is also a car park situated to the rear of Cofferridge Close and in the Market Square. All parking is conveniently located around the High Street. On the day of our site visit all car parks were nearly at full capacity.
- 11.28 There is no railway station located in the town centre. The nearest stations are located at Milton Keynes and Wolverton which are both a short taxi or bus journey away. There is an adequate bus service which operates regular services between Milton Keynes and Stony Stratford as well as to other surrounding towns and villages.
- 11.29 The centre is relatively accessible for pedestrians, particularly to the southeast of the High Street where a one-way system is in place. However, there are a lack of pedestrian crossings along the High Street. Introducing these would increase pedestrian safety. The pavements are also narrow although the relatively light traffic and traffic calming measures somewhat compensates for both of these factors.
- 11.30 At the time of our visit to the centre, there were cars parked along the High Street. Although there was little traffic flow at the time, we consider that this could cause safety issues during peak times, particularly as the streets are narrow.
- 11.31 We observed strong pedestrian flows around Costa which is situated in the centre of the High Street. There were weaker pedestrian flows towards the northwest of the High Street where the units are occupied by mainly secondary uses.

Out of Centre Provision

- 11.32 There is no out of centre retail provision in Stony Stratford.

New Investment & Potential Development

- 11.33 We are not aware of any new development coming forward in Stony Stratford.

Summary

- 11.34 In summary, we consider Stony Stratford to be a relatively healthy and viable centre, with a strong independent offer and high quality public realm. It is performing well against many of the health check key performance criteria. The key findings are summarised below:
- The centre is characterised by independent retailing, which complements the traditional nature of Stony Stratford. This helps to create a centre which is distinctive to nearby Central Milton Keynes.

- The centre has a strong mix of services and retail. Comparison, convenience and service offer is general in line or above national averages. A range of comparison goods categories are represented in the town centre. There is, however, a lack of a major supermarket in the centre; Budgens is the largest convenience goods store in the town centre. If there is adequate demand, the centre could benefit from attracting a larger supermarket to the town centre.
- There is potential to improve the current leisure offer in the centre. Attracting more food and beverage operators to the centre could help to enhance the centre's evening economy as well as increase dwell times during the day.
- The town centre vacancy rate is significantly below the national average. This suggests that Stony Stratford is currently performing well and is a healthy town centre.
- Whilst the free parking in the town centre is considered to be a key asset, pedestrian access along the High Street could be enhanced through the introduction of a pedestrian crossing.
- The environmental quality of the town centre is considered to be of best quality. The Georgian and Victorian architecture helps to create a pleasant and attractive environment which enhances the traditional nature of the town centre. All buildings are well maintained and there is lots of planting across the centre.

12 WOBURN SANDS TOWN CENTRE – HEALTH CHECK ASSESSMENT

Context

12.1 Woburn Sands is a small town and civil parish, south-east of Milton Keynes. It is linear in structure, anchored by a two small supermarkets (Tesco Express and the Coop). It also hosts a number of high quality independent retailers. The majority of the centre has a conservation area designation.

Retail Composition & Diversity of Uses

12.2 **Table 14.1** summarises the composition of the centre’s retail mix and diversity of uses. It should be noted that the composition is based on the CJ site visit from April 2017 and information available on Google Maps, The retailers have been categorised using the GOAD categories. The area surveyed by CJ covers the Town Centre Boundary shown in the Proposals Map.

Table 14.1: Current Retail and Service Offer- Outlets

Category	Number of Outlets	% of Total Outlets	UK (%)	Index
Comparison	13	30.2%	31.6%	96
Convenience	4	9.3%	8.7%	107
Retail Service	10	23.3%	14.2%	164
Leisure Service	10	23.3%	23.6%	99
Financial & Business Service	5	11.6%	10.5%	111
Vacant	1	2.3%	11.2%	21
TOTAL	43	100%	100%	

Source: CJ site visit from April 2017 and information available on Google Maps

Convenience

12.3 There are four convenience units which represents 9.3% of total outlets, which is above the national average of 8.7%. This is made up of Tesco Express, the Coop and Oliver Adams the baker. Given the character, role and function of the centre it is surprising that there are no independent butchers, or greengrocers. We thus consider that there is scope to improve the convenience provision by attracting such retailers.

12.4 We also understand that butchers, greengrocers and bakers are present at the quarterly community market.

Comparison Offer

12.5 There are 13 comparison outlets. This represents 32.5% of total units and is above the national average of 31.6%. There is a pharmacy, a jewellery shop, two charity shops, a florist, and a few independent fashion shops. This mix of comparison goods shops serves the basic needs of the local population, and is considered to be more than adequate for a centre of its size, role and function in the hierarchy.

Service Offer

12.6 There are 25 service businesses in Woburn Sands based on the CJ audit. This represents 58.1% of total units and is above the national average of 48.2%.

- 12.7 In terms of **retail services** there are 10 units, which is equivalent to 23.3% of total units and is above the national average of 14.2%. The main provision in this category includes hairdressers and barbers, a dry cleaner, a post office, a few hotels/B&B accommodations, a PFS and a travel agent.
- 12.8 Woburn Sands also has a strong representation of **leisure services**, with 10 outlets in total. This represents 23.3% of the total units, which is slightly below the national average of 23.6%. This category includes cafés, a takeaway, a variety of restaurants and a pub. Overall, the mix and quality of leisure facilities in the centre is good.
- 12.9 There are five **financial and business services**, which is equivalent to 11.6% of total outlets. This is slightly above the national average of 10.5%. The main services in this category include estate agents, two banks (Barclays and NatWest) and a recruitment agency. We note that NatWest is set to close its Woburn Sands branch, including the removal of the cash machine. This is unfortunate.
- 12.10 Overall, the provision and mix of service businesses in the centre is good, and meets the day-to-day needs of its local catchment population.

Vacancies

- 12.11 **Table 14.1** shows that on our site visit we recorded only one vacant unit in Woburn Sands. This is equivalent to a vacancy level of 2.3%, and is significantly below the national average of 11.2%. We consider this a healthy position.

Market

- 12.12 The centre is served by a community market that takes place quarterly, on the second Sunday of March, June, September and December around the Institute and Memorial Green. This is a market for locally produced food and crafts (as well as a couple of hot food stalls), and is run by volunteers and some Councillors. There are usually between 12 and 14 regular stalls, with a maximum capacity for 25 stalls. The market has been going for 3 years, and the management works hard to ensure that there is no duplication of stalls (i.e. no two stall selling the same products).
- 12.13 We understand that the market is popular with the local community, with a catchment radius of around 3 miles. The Town Council would like it to be more regular. However, we understand from the market management that whilst there is an opportunity to increase the frequency to six times a year, it is the matter of being able to recruit enough stall vendors.
- 12.14 Our research shows that the market could benefit from better marketing, such as a better online presence.
- 12.15 It is our recommendation that the market operation should be encouraged, and promoted.

Prime Zone A Rents

- 12.16 We are advised by our agents that Prime Zone A Rents in Woburn Sands are between £23 and £28 per sq ft. **Table 15** of **Appendix 10** compares Prime Zone A rents achieved in Woburn Sands at 2016 with other centres of similar role and function.

Multiple and Independent Retail Representation

- 12.17 **Table 2 of Appendix 10** shows there are a eight multiple outlets in Woburn Sands, including Co-op, Post Office, Tesco Express, NatWest Barclays Age UK, and Martin's. The centre's offer mainly comprises independent businesses, which is to be expected for a centre of its size and role. The majority of the independent retailers appear to be doing well, providing good quality goods and service. Maintaining and building on the independent offer, improving the quality of provision and building its niche market will be key for Woburn Sands' continued success as a shopping, service and leisure destination.

Accessibility & Pedestrian Flows

- 12.18 Woburn Sands is a compact centre which is easy to navigate through, albeit the pavements are very narrow.
- 12.19 There was moderate footfall within the centre at the time of our visit. This is firmly concentrated to the eastern side of the High Street where most retail outlets are located. The centre is readily accessible by car. Parking is provided on-street and by one busy free car park off Russell Street; the Town Council however highlighted that parking is an issue with demand exceeding supply.
- 12.20 Bus services connect Woburn Sands with Milton Keynes, Leighton Buzzard and Bedford. There is also a small railway station within the town that provides services to Bletchley and Bedford. This is located to the north of the commercial centre with a walking distance of approximately ten minutes.

Environmental Quality

- 12.21 Woburn Sands has a pleasant and attractive environment, with good legibility. The Library building and the adjacent memorial garden are located at the centre of the shopping area. They act as a landmark and contribute well to the sense of place.
- 12.22 The centre also has a number of attractive buildings with a variety of architectural styles. Generally, the majority of fascias/frontages are well maintained and contribute to the attractive shopping environment. The majority of the centre is designated as a conservation area.
- 12.23 The centre benefits from a relatively well maintained street paving, and there were no signs of graffiti or litter.
- 12.24 In our judgement the on-street parking does detract from the overall appearance of the centre, creating a crowded effect. Better parking facilities would therefore help to improve this situation.

Summary

- 12.25 In summary, we consider Woburn Sands is a relatively healthy and viable centre. It is performing well against many of the health check key performance criteria. The key findings are summarised below:
- It is well served in terms of its retail and service offer, and predominantly meets the day-to-day needs of its local catchment population.
 - Its retail mix is largely dominated by popular independent retailers. We advise that Woburn Sands should build on its independent offer, improving the quality of provision and building its niche retail offer.
 - The centre has a popular and profitable market, which is an important part of its overall offer. It should be managed and marketed proactively to enable it to grow and flourish, and potentially to be more regular (e.g. monthly).

- Woburn Sands has a relatively pleasant environment, with good accessibility; albeit there is a need to improve parking provision.
- Vacancy levels are low. This is a good sign of the performance of existing shops and services, and the demand for space where vacancies do occur.

13 LOCAL CENTRES

- 13.1 The NPPF seeks to ensure vitality and viability of “Town Centre” (see Chapter 2 of the NPPF). The NPPF states that the “Centre” definition applies to “to city centres, town centres, District Centres, and local centres but excludes small parades of shops of purely neighbourhood significance” (see p.57 – Town Centre Definition).
- 13.2 As part of the Study we have reviewed Milton Keynes Council’s planning policies that are relevant to Local Centres. Core Strategy Policy CS4 recognises Local and Village Centres to form part of the Council’s retail hierarchy. Saved Policy LC1 of Local Plan (2005) allocates a number of new local centres including Broughton; Grange Farm, Kingsmead, Monkston Park, Oxley Park, Tattenhoe Park, Campbell Park, Sustainable Residential Quarter, Newton Leys, Oakgrove and Stantonbury Park Farm. We also note Policy ER14 of the emerging Plan: MK, recognised the need to maintain the vitality of local centres and to protect their shopping function. We note that none of the adopted Development Plan documents currently provide a comprehensive list of all the Local and Village Centres, albeit both Saved Policy LC1 and emerging Policy ER15 list new/emerging Local Centres, and the Proposal Map shows some of the local centres, albeit without necessary naming them.
- 13.3 To inform the Study, the Council provided Carter Jonas with a list of Local Centres they understand to fall under the NPPF definition of Local Centres. The list is provided in **Table 15.1** below. As such, to comply with the national policies on Town Centres, we recommend that the Council, as part of the emerging Plan: MK, reviews the list and clearly defines the Local Centres in line with paragraph 23 of the NPPF: “*define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations*”.

Table 15.1. Milton Keynes Local Centres, as provided by the Council

Milton Keynes Local Centres	
Bancroft	MK Village
Beanhill	Monkston Park – LP Policy LC1
Bradville	Neath Hill
Bradwell Common	Netherfield
Broughton – LP Policy LC1	New Bradwell
Campbell Park – LP Policy LC1	Newton Leys – LP Policy LC1
Coffee Hall	Oakgrove – LP Policy LC1
Conniburrow	Oakridge Park
Crownhill	Old Farm Park
Downs Barn	Oldbrook
Eaglestone	Oxley Park – LP Policy LC1
Emerson Velley	Peartree Bridge
Far Bletchley	Shenley Brook End
Fenny Stratford	Shenley Church End
Fishermead	Shenley Lodge
Fullers Slade	Springfield
Furzton	Springfield
Galley Hill	Stacey Bushes
Giffard Park	Stantonbury – LP Policy LC1
Grange Farm – LP Policy LC1	Sustainable Residential Quarter, CMK – LP Policy LC1
Great Holm	Tattenhoe Park – LP Policy LC1
Great Linford	Tickford Fields Farm, Newport Pagnell
Greenleys	Tinkers Bridge Tinkers Bridge
Heelands	Two Mile Ash
Hodge Lea	Walnut Tree
Kents Hill	Walton Park
Kingsmead – LP Policy LC1	Water Eaton
Lakes Estate Bletchley - Serpentine Court	West Bletchley
Loughton	Willen
Middleton or Milton Keynes Village	Woughton on the Green

13.4 To assist with the definition of the Local Centres, as part of the Study we have been asked to provide a high level review of the following centres listed in **Table 15.1**:

- Broughton Gate
- Fenny Stratford
- Grange Farm
- Neath Hill
- New Bradwell
- Oakgrove
- Shenley Church End
- Stantonbury
- Two Mile Ash
- Conniburrow

- 13.5 On review of this list, it has become apparent that some of the centres listed in Table 15.1 are not defined on the Milton Keynes Council Proposals Map. As such, to comply with the national policies on Town Centres, we recommend that the Council, as part of the emerging Plan: MK, clearly defines the Local Centres in line with paragraph 23 of the NPPF i.e. *“define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations”*.

Broughton Gate Local Centre

- 13.6 Broughton Gate is to be a new local centre which will lie approximately 4.5km east of Central Milton Keynes, just off the main Chaffron Way (H7). The Local Plan (2005) designates Broughton Gate as a local centre (see Policy LC1) to meet the daily shopping needs of the population of the new Eastern Expansion Area. The centre will sit below the town centres of Newport Pagnell, Olney, Stony Stratford and Woburn Sands in the retail hierarchy. The centre is shown on Council’s Proposals Map. The scheme is anchored by the new 4,000 sq ft. Co-op convenience store and will be surrounded by over 2,000 new homes (see 11/02316/MKPC). Alongside the Co-op store, there are 2 independent grocery stores, 2 hair dressers, a dentist surgery, a beauty salon, a dry cleaners, a betting shop, a tattoo parlour and a fast food takeaway. The level of accessibility in the centre is relatively good; there are approximately 35 car parking spaces and there are also Santander Cycles for hire. There are no vacancies within the centre and the environmental quality of the centre is good.

Grange Farm Local Centre

- 13.7 Grange Farm is a local centre located approximately 4km south west of Central Milton Keynes. The wider grid square of Grange Farm is bordered by Portway to the south, Fulmer Street to the east and Danstead Way to the north. The Local Plan (2005) designates Grange Farm as a local centre (see Policy LC1) sitting below the town centres of Newport Pagnell, Olney, Stony Stratford and Woburn Sands. The centre is shown on Council’s Proposals Map. The retail units at Grange Farm are concentrated on the ground floor of a flatted development, primarily on Singleton Drive and Dunthorne Way. The majority of retail units within the centre are composed of leisure service units, including coffee shops and takeaways. There are also two retail outlets which are occupied by hairdressers. The centre is anchored by the Co-op, which is the only multiple retailer. The centre’s accessibility is considered good and there are ample car parking spaces. Grange Farm also benefits from an attractive shopping environment, and it is relatively modern in its design and layout. Its well-kept shop fronts and cleanliness enhance the character of the local centre.

Oakgrove Local Centre

- 13.8 Oakgrove Village located approximately 3km east of Central Milton Keynes. The wider grid square is bordered by Chaffron Way (H7) to the south, Brickhill Street (V10) to the east and by the River Ouzel to the west. The residential community is supported by a small provision of retailers which form a local centre under policy LC1 of the Local Plan Saved Policies (2005). Oakgrove Local Centre is shown on the Council’s Proposals Map. The centre has been created in order to meet the daily shopping needs of the population of this new residential area. The local centre includes two A3/A4 units totalling 584 sqm GIA, and four A1 retail units totalling 4,839 sqm GIA to serve the retail development. These units are currently occupied by Waitrose, Metro Bank and Costa Coffee and therefore there is a mixed retail offer.

Fenny Stratford Local Centre

- 13.9 Fenny Stratford Local Centre lies approximately 5.5km south east of Central Milton Keynes, and its designation means that it functions to meet the daily and 'top-up' shopping needs of the local population. Fenny Stratford Local Centre is shown on the Council's Proposals Map, and is mentioned as a centre within adopted Local Plan (2005) (see page 198). The local centre lies within a wider grid square, which is bounded by railway lines to the north and west, the Grand Union Canal to the east, and the A4146 to the south. The centre contains two main elements: the main being a linear section along Aylesbury Street, as well as a small row of units along Watling Street. The centre's retail provision is composed largely by comparison units (including appliance shops, hardware stores, and a number of independent women's clothes stores), leisure services and retail services (including a number of hairdressers, barbers, and beauticians). From a qualitative point of view, there may be a need to improve convenience provision within Fenny Stratford, subject to demand. It is important to note that all retail units within the centre are independently owned, with the exception of the William Hill betting shop on Aylesbury Street. The level of accessibility in the centre is relatively good; although parking along Aylesbury Street is restricted in some locations, approximately 20 car parking spaces are provided and these allow for 1 hour parking. Although there are two vacant units within the centre, there are no major concentrations of vacant units and the environmental quality of the area is considered to be adequate.

Neath Hill Local Centre

- 13.10 Neath Hill is a local centre, which is located approximately 2.5km north east of Central Milton Keynes. It is situated on the edge of the wider grid square, which is bordered by Monks Way to the north, Overstreet to the east, Dansteed Way to the south and Marlborough Street to the west. As a local centre within the retail hierarchy, it functions to meet the daily and 'top-up' shopping needs of the local population. Neath Hill Local Centre is shown on the Council's Proposals Map, however is not mentioned as a centre within the adopted Local Plan (2005). The centre is anchored by the Co-op, which is the only convenience offer and the only multiple retailer within the centre. The centre's retail provision is composed largely of leisure service outlets including restaurants, takeaways, a pub and a betting shop. There is also 1 vacant unit within the centre. Neath Hill is accessible by all transportation modes, and there is a large number of car parking spaces in the middle of the centre. Improvements could, however, be made to the provision of cycle parking since there are only a few spaces present outside of the Co-op. The centre has a clean and functional shopping environment, and it benefits surrounding green space.

New Bradwell Local Centre

- 13.11 New Bradwell local centre lies 3.5km north west of Central Milton Keynes. The wider grid square of New Bradwell is bounded by Grafton Street (V6) and the Grand Union Canal to the south and Newport Road and the River Great Ouse to the north. As a local centre within the retail hierarchy, New Bradwell functions to meet the daily and 'top-up' shopping needs of the local population. New Bradwell Local Centre is shown on the Council's Proposals Map, however is not mentioned as a centre within the adopted Local Plan (2005). The centre's retail provision is composed largely of leisure services (including fast food takeaways and restaurants), retail services (including a hairdressers and a beauty salon) and convenience units. There is an opportunity to increase the centre's provision of comparison units, of which there is none, and financial services, of which there is only one. Whilst the centre is dominated by independent retailers, it is anchored by the Co-op, which is the only multiple retailer. In terms of accessibility, both sides of High Street, where the local centre is situated are lined with car parking spaces, and cycle parking is present at a number of points. As such, the centre is considered to be relatively accessible. The environmental quality of the centre is also good with a clean and functional environment and well-kept shop fronts.

Shenley Church End Local Centre

- 13.12 Shenley Church End is located approximately 3km south west of Central Milton Keynes, and neighbours the parish of Shenley Brook End. The wider grid square, in which the Shenley Church End local centre is located, is bordered by Portway to the north, Watling Street to the east, Childs Way to the south, and Fulmer Street to the west. It is allocated as a local centre within the retail hierarchy meaning it functions to meet the daily and 'top-up' shopping needs of the population. Shenley Church End Local Centre is shown on the Council's Proposals Map, however is not mentioned as a centre within the adopted Local Plan (2005). Whilst the centre's retail provision is primarily made up of leisure services including fast food outlets and a betting shop. There is a good mix of comparison and convenience units (including a community shop, a pharmacy, and an off license) as well as a post office and an estate agents. It is the large format Sainsbury's store that anchors the centre. The local centre has excellent accessibility with a large number of car parking spaces within Benbow Court (including disabled spaces), an MK Santander Cycle docking station, and pedestrian links to the south and west. The centre also hosts an attractive and clean shopping environment, with well-kept shop fronts and ample planting.

Stantonbury Local Centre

- 13.13 Stantonbury is a local centre located approximately 2.5km north west of Central Milton Keynes. The centre is located on the edge of the wider grid square, which is bordered by Marlborough Street (V8) to the north and east, Monks Way to the south, and Saxon Street to the west. The Local Plan (2005) designated Stantonbury as a local centre (see Policy LC1) sitting below the town centres of Newport Pagnell, Olney, Stony Stratford and Woburn Sands. Stantonbury Local Centre is shown on the Council's Proposals Map. The centre is composed of a Lloyds Pharmacy and a Costcutter, which both function to meet the daily and 'top-up' shopping needs of the surrounding population. Although not situated within the centre, the neighbouring Purbeck Health Centre also provides an important facility to the community. We are advised by the Council that traditionally Stantonbury is a poorly performing local centre despite being located on one of the larger grid squares.

Two Mile Ash Local Centre

- 13.14 Two Mile Ash lies approximately 3km west of Central Milton Keynes. The wider grid square is bordered by Monks Way to the north, Great Monks Street (V5) to the east, Dansteed Way to the south, and Watling Street to the west. Its allocation as a local centre within the retail hierarchy means that it functions to meet the daily and 'top-up' shopping needs of the local population. The local centre is shown on the Council's Proposal Map, however is not mentioned as a local centre within the adopted Local Plan (2005). The only retail outlet within the local centre is the One Stop Shop, and therefore the centre's retail provision is comprised solely of convenience offer. The local centre is situated in an area surrounded by housing and therefore it is greatly accessible by foot. Given that there is only one store within the centre, there are ample car parking spaces and the one way traffic system keeps traffic flowing. A large area of the local centre is open space with green areas, planting and seating areas, and this creates, therefore, an attractive environment.

Conniburrow

- 13.15 Conniburrow lies approximately 1km north of Central Milton Keynes. The wider grid square of Conniburrow is adjacent to the city centre and bordered by Dansteed Way to the north, Marlborough Street to the east, Portway to the south, and Saxon Street to the west. According to the Council's Proposals Map, the Conniburrow grid square does not benefit from a local centre designation. The retail provision in Conniburrow is composed largely by convenience units including mini markets and small groceries stores, with one comparison unit and a small

row of service units which include takeaways, a hairdressers and a beauticians. The retail provision is rather scattered around the grid square, with the majority of units located on the corners of residential blocks. The 'made' Great Linford Neighbourhood Plan 2 (South Area) identifies a need for improvements to the provision of shops and services in Conniburrow. The document states that historically, the proximity of the Conniburrow community to the city centre was thought to obviate the need for a local centre, however supermarkets and retail food outlets have moved out of the city centre, creating a real challenge to Conniburrow residents. As such **Policy GLPC S15B** of the Great Linford Neighbourhood Plan 2 seeks to protect local retail, public houses and other local facilities.

14 QUANTITATIVE RETAIL NEEDS ASSESSMENT

14.1 This section sets out the results of the quantitative retail need ('capacity') assessment for new retail (comparison and convenience goods) floorspace in the Milton Keynes Council area covering the period from 2017 to 2031; further broken down into five year periods (i.e. 2022 and 2027). This assessment updates and supersedes the findings of the Council's previous evidence-based studies.

CREAT^e Model: Key Baseline Assumptions & Forecasts

14.2 The CREAT^e economic capacity model has been specifically designed and developed by Carter Jonas over a number of years to assess the capacity for and impact of new retail (convenience and comparison goods) development and investment.

14.3 The (Excel-based) model adopts a transparent '*step-by-step*' approach in which all the key assumptions and forecasts can be easily tested, in accordance with good practice advice. The model draws on the market share analysis derived from the household telephone interview to help inform the assessment of current (food and non-food) shopping patterns and the base year (2017) turnover and trading performance of existing centres, shops and stores.

14.4 It has been assumed for the purpose of the capacity assessment that the local retail markets in the local authority area are in '*equilibrium*' at the base year. In other words all existing centres and stores are broadly assumed to be trading in line with their expected ('benchmark') turnover levels at the base year. This approach is reasonable, robust and realistic in this case as it reflects the impact of the economic downturn and the dynamic changes in the retail sector over the last decade, and principally the significant growth and impact of in internet shopping on the trading performance of retailers and stores across the UK. It also reflects the potential impact of Brexit on the economy and retail sector going forward. Further to this, there is no qualitative evidence from the health check assessments that clearly demonstrates that any of the main centres and stores in the local authority areas are significantly over-trading or under-trading at the base year.

14.5 On this basis any residual expenditure available to support new retail floorspace over the development plan period will be derived from the difference between the forecast growth in 'current' (survey-derived) turnover levels (based on population and expenditure growth); and the growth in 'benchmark' turnovers²⁵ based on applying robust year-on-year 'productivity' ('efficiency') growth rates to all existing and new retail floorspace²⁶.

14.6 It is important to restate that long-term forecasts should be treated with caution, as they will be influenced by changes in economic, demographic, retail and property market trends. As a result we advise that greater weight should be placed on the short-term forecasts carried out over a five year period (see PPG, para 003).

14.7 Notwithstanding this, the Council will need to take account of the forecast capacity for new retail floorspace over the plan period to inform its policy making and site allocations, as the NPPF (paragraph 23) states that local planning authorities should meet the need for retail and town centre uses '*in full*' (see Section 2 of this study).

²⁵ In this case, under the 'equilibrium' approach, the 'benchmark' turnovers at the base year (2017) are assumed to be the 'current' turnovers derived from the market share analysis.

²⁶ The 'efficiency' growth rates are informed Experian's latest *Retail Planner Briefing Note* (Figures 4a and 4b). These year-on-year turnover growth rates help to maintain the viability and vitality of existing centres and stores over time, particularly against the backdrop of increasing occupancy costs (e.g. rents, business rates, service charges, etc.) and labour costs. It should be noted that individual centres, stores and shopping facilities will be capable of achieving higher and/or lower annual 'efficiency' growth depending on a range of trading factors (including the size, quality and type of retail floorspace). In this case we have assumed slightly higher turnover 'efficiency' growth levels for existing and committed floorspace in the local authority areas for the period 2025-2036 than forecast by Experian (see Section 3 of this study for a more detailed explanation).

- 14.8 Finally, it should be noted that the updated capacity forecasts set out in this section are intended as a broad guide to enable the Council to assess the broad strategic options for the scale and spatial distribution of new retail-led floorspace and development over the plan period, and to make informed policy choices about where any forecast need should be met/allocated, in accordance with the advice set out in the NPPF (paragraph 24). It follows that the allocation of sites to meet any identified need over the next five years, and over the lifetime of the development plan, will depend on a range of key considerations, including the suitability, viability and availability of sites in or on the edge of existing centres, and the potential to expand existing centres to accommodate the forecast needs.
- 14.9 The key steps in the retail capacity assessment, and the main assumptions and forecasts underpinning the CREATE Model are described in more detail below.

Base Year Population and Projections

- 14.10 The 2017 ('base year') population estimates and projections (to 2022, 2027, and 2031) for the Study Area and zones have been derived from a number of sources.
- 14.11 The base year (2017) **population figures** have been sourced from Experian's *'Retail Planner Reports'* using CJ's in-house (Experian-based) MMG3 Geographic Information System (GIS). The population figures are based on the latest ONS Sub-National Population Projections.
- 14.12 For **Zones 4 and 9** the **population projections** have been sourced from the Council, and are derived from the *'POPGROUP'* model. The model uses a standard cohort component forecasting method to produce age-specific population projections. The population age structure at the base year is based on 2016 ONS *Mid-year Population Estimates*²⁷. The projections also take into account the population increase associated with the number of future dwellings, as set out in the proposed submission *Plan:MK* (October 2017).
- 14.13 For the remaining Zones, the population projections are derived from Experian's revised *'Demographic Component Model'*. These projections take into account mid-year age and gender estimates and project the population forward year-on-year based on Government population projections for local authority areas in England. The yearly components of population change that are taken into account are the birth rate (0-4 age band), ageing, net migration, death rates, etc. Although the projections do not necessarily take account of the impact of local housing-led policy allocations on potential population growth, the population figures in this case have been compared with the Council's projections (which do take account of forecast housing allocated growth) and have been found to be compatible.
- 14.14 **Table 1 (Appendix 11)** sets out the base year population for the Study Area and 14 study zones. It shows that there are some 677,808 people living in the defined Study Area at 2017. Of these, 267,135 people reside within Zones 1-7, 9 and 10, which broadly correlates to the Council's administrative boundary. The population projections show a total population growth of +13.7% (+92,799) across the Study Area to 771,607 by 2031.

²⁷ The standard schedule of age-specific fertility and mortality rates are taken from the latest (2014-based) schedule produced by ONS. The standard schedule of migration rates (internal and external) are from a 5 year average of ONS estimates specific to Milton Keynes.

Expenditure Per Capita and Special Forms of Trading (SFT)

- 14.15 **Appendix 11 and 12** set out the average expenditure per capita estimates for convenience goods and comparison goods (Tables 2 respectively) in 2017 for each of the study zones, after making an allowance for Special Forms of Trading (SFT)²⁸ (see Section 3).
- 14.16 The base year average expenditure per capita figures have been derived from our in-house Experian MMG3 GIS and have been grown up to 2031 in line with the annual forecasts set out in Experian's RPBN15. As described in Section 3 Experian forecast more limited year-on-year growth in convenience and comparison goods expenditure than previous forecasts. It should be noted that these forecasts do not take account of the (as yet unknown) impact of external factors, such as the potential future impact of Brexit on UK economic growth and consumer spending.
- 14.17 Our allowance for SFT at the local level has been informed by the results of the household survey. The survey-derived shares have necessarily been adjusted downwards to reflect the fact that a proportion of online sales are still sourced from traditional stores rather than from dedicated ('dotcom') warehouses²⁹. This approach is in compliance with the advice set out in Experian's RPBN15.
- 14.18 The adjusted market share analysis shows that SFT's current share of available expenditure in the total Study Area is 15.2% for comparison goods in 2017, which is above the national average figure of 14.8% identified by Experian (for 2017). For convenience goods the locally adjusted SFT market share is 1.5%, which is much lower than the national average of 3.2% (in 2017). It follows that if the growth in SFT's market share across the Milton Keynes area is higher than the national average, then this will reduce the capacity for new retail (convenience and comparison goods) floorspace over time.

Total Available Expenditure

- 14.19 **Tables 2 and 3 (Appendix 11 and Appendix 12)** set out the total available retail expenditure for convenience and comparison goods respectively in the Study Area and zones³⁰. This is derived by multiplying the population and average expenditure per capita levels together. The expenditure forecasts are as follows:
- **Convenience Goods** expenditure is forecast to increase by +13.1% (+£189.6m) within the Study Area, from £1,444.6m in 2017 to £1,634.2m by 2031. For the Council Area (i.e. Zones 1-7, 9 and 10) total expenditure is forecast to increase over the same period by +15.4% (£83.1).
 - **Comparison Goods** expenditure increases by +69.8% (£1,505.1m) within the Study Area, from £2,155.6m in 2017 to £3,660.7 by 2031. For the Council Area (i.e. Zones 1-7, 9 and 10) total expenditure is forecast to increase over the same period by +73.4% (£569.3).
- 14.20 The growth in available comparison goods expenditure significantly outstrips convenience goods spend up to 2031. This effectively means that there should be greater capacity potential for new comparison goods floorspace over the forecast period than for convenience goods retailing; although this will be dependent on the level of retail commitments in the pipeline and the forecast growth in the 'productivity' levels of existing floorspace and stores.

²⁸ SFT comprises non-store sales via the internet, mail order, stalls and markets, door-to-door and telephone sales.

²⁹ Drawing on Experian's latest research we have assumed that some 25% of SFT convenience goods sales and 70% of comparison goods sales are sourced from traditional ('physical') retail space.

³⁰ Please note that these figures exclude SFT that is not sourced from traditional shops in the Study Area.

Market Share Analysis

- 14.21 **Section 4** described the headline results of the survey-derived (%) market share analysis, including SFT. For the purpose of the retail capacity assessment the market share analysis has been adjusted for both convenience goods (**Table 1, Appendix 15**) and comparison goods (**Table 1, Appendix 16**) to exclude SFT³¹.
- 14.22 The next key stage in the capacity assessment involves allocating the baseline convenience and comparison expenditure (£ million) within the Study Area and zones to the identified centres, stores and floorspace based on the survey-derived market shares. This helps to establish the current 'baseline' (2017) trading performance for the main centres and stores across the Council area based on expenditure drawn from the Study Area only. It should be noted that no allowance is made at this stage for any potential "inflow" (trade draw) of expenditure to centres and stores from outside the defined Study Area.
- 14.23 For both convenience and comparison goods the 'baseline' turnovers are projected forward to 2022 (Table 3), 2027 (Table 4), 2031 (Table 5), assuming no changes in market shares. This '*constant market share approach*' is standard practice for retail capacity and impact assessments. However, the Council will be aware that it is a highly theoretical in that it does not, for example, take account of the potential impact of new retail investment and development (both within and outside the Council area) on existing shopping patterns and market shares over time.

'Inflow' (Trade Draw)

- 14.24 In order to provide a complete picture of the current trading (turnover) performance of the main centres and stores in the Council area we have necessarily made informed judgements with regard to the likely 'inflow' (trade draw) from outside the Study Area. In the absence of detailed published turnover and trade draw information at the local level, our judgements have been informed by previous studies and retail assessments, as well as the survey and health check evidence. The 'inflow' assumptions also take account of:
- the scale, offer and location of all existing centres and stores in the Council area;
 - the likely extent of their catchment areas;
 - the competition from centres, stores and shopping facilities outside the Council area and the wider Study Area; and
 - the likely retail expenditure derived from people who live outside the Study Area (including visitors and commuters) to main centres and stores in the Council area.
- 14.25 Although the assessment of 'inflow' is not a straightforward exercise, due to the complex nature of overlapping catchments and shopping patterns it is reasonable to assume that the Council's main centres will draw a proportion of their turnovers from outside the widely defined Study Area.
- 14.26 To help inform our judgment we have reviewed the inflow figures that were used in the 2011 *Milton Keynes Retail Study* (2011), and also the evidence available from the latest Retail Studies prepared for the neighbouring local authorities (namely Oxford City Council, Aylesbury Vale District Council, and Bedford Borough Council).
- 14.27 In this case we estimate that, on average, the foodstores and convenience shops in the Central Milton Keynes will draw a relatively limited proportion of their total convenience trade from outside the widely defined Study

³¹ This is in accordance with the standard approach for retail assessments, which make a deduction for SFT at the outset from the expenditure per capita figures.

Area. This reflects the fact that households normally carry out their main 'bulk' food and 'top up' food shopping purchases at the closest and most convenient stores to where they live, work or study.

- 14.28 In contrast, we forecast that the 'inflow' ('draw') of comparison goods expenditure from outside the defined Study Area to Central Milton Keynes will be higher (at circa 15%), which reflects its significant offer and attraction as a top-ranking UK shopping destination,
- 14.29 We have also assumed that CMK's out-of-centre retail facilities could draw 4% of their total comparison goods turnover, and 3% of their convenience turnover, from outside the Study Area. This reflects the relative scale and quality of their retail offer.
- 14.30 Turning to the District Centres we have assumed that they do not benefit from any "inflow" trade. This reflects the relatively modest scale and quality of their retail offer, and the fact that they mainly serve the 'day-to-day' needs of their more local resident catchment populations.
- 14.31 Based on the (survey-derived) market analysis and the 'inflow' assumptions, **Table 1** set out the revised (survey-derived) 'current' turnover levels for convenience goods (**Appendix 17**) and comparison goods (**Appendix 18**) for the Council's main centres and stores.

Retail Floorspace Commitments & Allocations

- 14.32 Based on information provided by the Council **Table 2 (Appendices 16 and 17)** sets out the major known commitments and policy-led floorspace allocations in the Council area. Our forecasts of the likely convenience goods and comparison goods turnovers of the new floorspace based on the available evidence and our own judgements.
- 14.33 In summary, we forecast that all the known retail commitments at the time of preparing this study will achieve a total convenience goods turnover of £173.5m in 2022, increasing to £174.8 m by 2031, based on Experian's 'productivity' growth rate for existing and new retail floorspace (**Appendix 17**).
- 14.34 We also forecast that all the major comparison goods floorspace commitments will achieve a total combined turnover of £258.2m in 2022, increasing to £314.7m by 2031, based on Experian's 'productivity' growth rate for existing and new retail floorspace (**Appendix 18**),

Comparison Commitments

- 14.35 The following provides a brief summary of the main comparison goods floorspace commitments in CMK and the wider local authority area of over 1,000 sqm (net), either with planning permission or under construction at the time of finalising this study:
- **The Point, Midsummer Boulevard (CMK) (13/01729/OUT)** – Outline planning permission for the demolition of The Point and redevelopment of the site to provide a range of retail (use classes A1-A5) and leisure (use class D2) uses and incorporating a maximum of 20,600 sqm (Gross Internal Area) floorspace.
 - **Lloyds Court, Silbury Boulevard (CMK) (15/01600/FUL)** – Re-development behind retained and refurbished facades of Lloyds Court, to create 11,383 sqm space (including the retention of existing unit let to Lloyds Bank), for Use Class A1 convenience retail (up to 2,892 sqm), Use Class A1 comparison retail (up to 6,004 sqm), Use Class A1 service (up to 454 sqm), Use Class A2 financial/professional (up to 3,561 sqm excluding the retention of existing unit let to Lloyds Bank), Use Class A3 restaurant/cafe (up to 3,015 sqm), Use Class A4 drinking establishment (up to 694 sqm), sui generis betting office space (up to 291 sqm), and Use Class D1 space (up to 448 sqm), including demolition and removal of courtyards and the

addition of an enclosed delivery bay, cycle parking spaces, car parking spaces, and improvements to the public realm

- **Intu Midsummer Place (CMK) (15/01074/OUT)** - Redevelopment of parts of the existing Intu Milton Keynes shopping centre to create a maximum of approximately 11,000sqm of additional floor space. The permission allows for flexibility in the final balance of uses; at this stage the following mix of uses has been identified: 4,000sqm of A1 (retail) & A2 (financial and professional); 1,500sqm of A3 (restaurant and café), 1,100sqm of A5 (hot food takeaway), and 1,800sqm of D2 (leisure) uses, plus 2,600sqm of servicing areas and toilets.
- **116 Silbury Arcade, The Centre:MK (17/01684/FUL)** - Extensions and alterations to former BHS unit to provide additional retail trading floorspace and associated rooftop plant and enclosure and associated works. The proposed development will be occupied by Primark over three floors, with a net tradeable floorspace of 9,000 sqm.
- **Leisure Plaza (12/02440/MMAM)** – Minor material amendments to earlier planning permission (11/00251/FUL). The general consent is for refurbishment of existing ice rink in an out-of-centre location, new build casino, leisure, food and drink (use classes D2, A3, A4), conference facilities, new retail unit (use class A1) and associated car parking, landscaping, and alterations to vehicular and pedestrian access.

Convenience Commitments

14.36 The following schemes comprise an element of convenience goods floorspace over c.1,000 sqm (net) with planning permission and/or under construction:

- **Exchange House Cbx1, Midsummer Boulevard (CMK) (15/00964/FUL)** – To widen the current use to include Use Classes A1-A5
- **Land At Savoy Crescent Avebury Boulevard and Lower Twelfth Street (CMK) (14/02498/FUL)** – Erection of hotel (use class C1), retail unit (use class A1) and leisure units (use class A3/A4), together with associated hard and soft landscaping.
- **Land At Brooklands, North of Broughton Brook (Local Centre) (06/00220/MKPCO)** – Outline permission for residential development comprising up to 2,501 units, new mixed use commercial centre, a hotel, a segregated transport route, public open space, sites for three schools, ancillary roads, structural landscaping and infrastructure including an extension to Broughton Brook linear park and detailed planning permission for the construction of Brooklands public open space ridge along the eastern boundary of site.
- **Land to the North of Arran Way, Newton Leys (Local Centre) (15/01695/FUL)** – Hybrid application – full planning application for 34 residential units and 1,724 sqm of retail (7 units) with associated access, landscaping and car parking. Outline planning permission for – Care Home, (Use Class C2), Public House (Use Class A4), Day Nursery (Use Class D1) with all matters reserved aside from access.
- **Tattenhoe Park, Snelshall Street H7 to H8 (Local Centre) (17/00918/OUT)** – Renewal of outline planning permission 06/00856/MKPCO for residential development of up to 1,310 dwellings, a mixed use local centre of up to 2,000 sqm; site for primary school (now delivered); community facilities; hotel and public house; public open space and associated landscaping; and infrastructure for an extended period of 10 years. Amendments to the illustrative masterplan including removal of the bus link to Steinbeck Crescent, relocation of local centre to eastern boundary and relocation of sports pavilion and sites reserved for community use.
- **Area 10 Western Expansion Area Land West of Watling Street (V4) and North of Danstead Way (H4) (Local Centre) (11/01685/MKPCO)** – S73 application to vary planning condition 6 and Table 1 of condition 15 of outline planning permission 05/00291/MKCPO to increase the permitted total retail floorspace within the proposed Area 10 High Street by 1,500 sqm gross to 9,000 sqm gross and allowing for 500 sqm gross (convenience and/or comparison floorspace) at the proposed area 10 Local Centre.
- **Wolverton District Centre – Land at the Agora Centre, Church Street (15/00913/FUL)** – Demolition of existing Agora building, re-installment of Radcliffe Street, reconfiguration of existing car park (total car parking space 207) and construction of a new mixed-use development including 100 residential units, 8

ground floor retail units with retail storage (GIA 3,276.3 sqm), associated hardstanding and landscaping work.

- **Wolverton DC – Land at Wolverton Railway Works, Stratford Road (16/00360/FUL)** – Partial demolition of the Stratford Road wall, removal of two trees, and erection of a foodstore of 2,478 sqm GIA with associated access including new pedestrian ramp and steps, servicing, parking and landscape.
- **The Glebe Lands (06/00222/MKPCO)** – Outline permission for out-of-centre construction of logistics/distribution, offices and manufacturing development with structural landscaping and infrastructure including an extension to Broughton Brook linear park and detailed planning permission for the construction of Brooklands public open space ridge along the eastern boundary of the site.
- **Former Aston Martin Site Tickford Street (13/02658/FUL)** – Variation of condition 1 (amendments to approved drawings) and removal of condition 32 (recycling centre) attached to planning permission 10/01916/FUL for the erection of a 3,527 sq m foodstore in an out-of-centre location; change of use of the 3 Tickford Street frontage buildings for use classes B1 (business) and D1 (non-residential institutions); new access junction; car parking; areas of public realm, landscaping and associated works.

Milton Keynes Council Area: Capacity Forecasts

- 14.37 The 'global' capacity forecasts for new retail floorspace in the Council area up to 2031 are set out in Table 3 for convenience goods (**Appendix 17**) and comparison goods (**Appendix 18**). The key assumptions and headline results are briefly described below.

Convenience Goods Capacity

- 14.38 In order to assess the potential capacity for new convenience goods floorspace up to 2031 we have necessarily tested the following two trading scenarios for different types and formats of food/convenience retailing in order to convert the residual expenditure (after taking account of new commitments) into a (net) sales area figure:
- **Superstore format' trading scenario** – we have first assumed that the residual expenditure could support one of the 'top 6' foodstore operators (i.e. Tesco, Sainsbury's, Asda, Morrisons, Waitrose and Marks & Spencer), which together could achieve an average sales density of approximately £12,500 per sqm in 2017 (2015 prices) based on the latest Mintel UK Retail Rankings; and
 - **Supermarket/discounter' trading scenario** – we have also tested the impact on the capacity forecasts of assuming the residual expenditure is taken up by a supermarket (e.g. Co-op, Budgens, etc.) and/or 'discount' retailer (principally Aldi and Lidl) trading at a slightly lower average sales levels of circa £7,000 per sqm in 2017. However, it should be noted that both Aldi and Lidl have increased their company average sales densities significantly over recent years due to their expansive store opening programmes and their increasing market share of the grocery sector. If this trend continues then we consider that the gap between the 'top 6' grocers and the main discounters will narrow further over time.
- 14.39 As stated previously, it has been assumed that the local retail market is in 'equilibrium' at the base year as there is no qualitative evidence to show that existing stores/floorspace are significantly over and/or under trading. We have also allowed for the year-on-year growth in the turnover 'efficiency' (floorspace 'productivity') of all new and existing convenience floorspace in line with the latest national forecasts set out in Experian's *Retail Planner Briefing Note 15* (Figure 4a).
- 14.40 **Table 3 (Appendix 17)** sets out and explains the key steps underpinning the convenience goods capacity assessment. The assessment shows that there is no Council-wide convenience goods capacity due to the commitments highlighted above.
- 14.41 To further help inform the Council's assessment of the potential scale and optimum location for new retail (convenience and comparison goods) floorspace across the Council area, we have also carried out a more

refined (location-by-location) capacity assessment. However, it should be noted at the outset that any forecast capacity identified for a specific centre/area does not necessarily mean that all the retail floorspace can and/or should be provided within that centre per se. For example, there may be a lack of suitable and viable sites available in some centres, or there may be other policy, heritage, transport and physical constraints to development. Alternatively, it may be more appropriate to locate the floorspace capacity in one centre over another to encourage more sustainable travel patterns and/or help to achieve specific policy, regeneration and/or investment objectives.

- 14.42 Against this background, **Tables 4-16** of **Appendix 17** disaggregate the Council area-wide 'global' capacity for the main centres, after allowing for planned commitments. The results are summarised in the tables below.
- 14.43 In broad terms, should the Council consider the potential for new convenience floorspace within new developments then this should be located in a sustainable and sequentially preferable location; preferably either in or on the edge of an existing town centre in accordance with national and local plan policy.
- 14.44 This is particularly relevant to the District Centres of Kingston, Westcroft and Bletchley where strengthening new convenience provision could help to attract new shoppers to the centre and support footfall for the city/town centres as a whole through linked trips.

Table 16.1 Convenience Goods Capacity (Net) – New Superstore Format (sqm)

	2022	2027	2031
CENTRAL MILTON KEYNES	-642	-339	-146
DISTRICT CENTRES			
Kingston District Centre	383	676	851
Westcroft District Centre	300	577	765
Bletchley District Centre	157	279	358
Wolverton District Centre	-1,863	-1,559	-1,371
ALL DISTRICT CENTRES	-1,023	-26	603
TOWN CENTRES			
Newport Pagnell	15	89	135
Olney	40	76	100
Stony Stratford	19	39	52
Woburn Sands	53	104	139
ALL TOWN CENTRES	127	308	425
LOCAL CENTRES	-7,542	-6,986	-6,633
OUT OF CENTRE	-1,920	-1,071	-527
TOTAL CONVENIENCE GOODS CAPACITY	-11,000	-8,114	-6,278

Table 16.2 Convenience Goods Capacity (Net) – New Supermarket / Discounter Format (sqm)

	2022	2027	2031
CENTRAL MILTON KEYNES	-1,147	-605	-261
DISTRICT CENTRES			
Kingston District Centre	683	1,208	1,521
Westcroft District Centre	535	1,030	1,365
Bletchley District Centre	281	498	640
Wolverton District Centre	-3,327	-2,783	-2,449
ALL DISTRICT CENTRES	-1,827	-47	1,077
TOWN CENTRES			
Newport Pagnell	27	159	240
Olney	71	136	178
Stony Stratford	34	70	93
Woburn Sands	95	186	248
ALL TOWN CENTRES	226	551	759
LOCAL CENTRES	-13,467	-12,475	-11,844
OUT OF CENTRE	-3,428	-1,912	-941
TOTAL CONVENIENCE GOODS CAPACITY	-19,644	-14,489	-11,211

Comparison Goods Capacity

14.45 Table 3 (**Appendix 18**) sets out the total residual capacity for new comparison goods floorspace in the Milton Keynes Council area after allowing for the turnover of all known commitments. The table below summarises the comparison goods capacity for the Council Area and the main centres over the plan period.

Table 16.3 Milton Keynes Council Wide Comparison Capacity (sqm net) – ‘Baseline’ Scenario

	2022	2027	2031
Central Milton Keynes	-26,036	-7,850	14,290
Kingston District Centre	678	1,675	2,891
Westcroft District Centre	184	480	842
Bletchley District Centre	708	1,913	3,416
Wolverton District Centre	126	416	740
Newport Pagnell	32	227	415
Olney	64	199	356
Stony Stratford	59	185	326
Woburn Sands	23	60	106
Local Centres	106	261	450
Out of Centre	-204	4,235	9,657
TOTAL COUNCIL COMPARISON GOODS CAPACITY	-24,260	1,801	33,490

- 14.46 The 'Baseline' capacity forecasts assume that new floorspace will achieve a reasonable and robust average sales level of circa £6,000 per sqm in 2017³². It is also assumed that all new and existing floorspace will experience a year-on-year growth in turnover 'efficiency' (floorspace 'productivity') in line with the latest national forecasts set out in Experian's *Retail Planner Briefing Note 15* (Figure 4b).
- 14.47 The table shows that there is no or limited capacity for new comparison goods floorspace up to 2022 and 2027, after taking account of all known retail commitments. By 2031 there is a forecast potential capacity for 33,490 sqm of additional comparison floorspace in the Council area. All the forecast capacity is therefore concentrated in the last 5 years of the forecast period.
- 14.48 Against this background, **Tables 4-14 of Appendix 18** also disaggregate the Council area-wide 'global' capacity for the main centres.
- 14.49 In terms of in-centre capacity, the majority of the forecast floorspace capacity by 2027 is focussed in Kingston (1,675 sqm) and Bletchley (1,913 sqm) District Centres. There is no forecast capacity for new retail floorspace in CMK due to the impact of all known commitments. By 2031, the in-centre capacity for CMK increases to 14,290 sqm due to the forecast growth in population and available expenditure. After CMK, Bletchley (3,416 sqm) and Kingston (2,891 sqm) generate the highest capacity for new comparison floorspace.
- 14.50 The out of centre locations in the Milton Keynes Council area are also generating capacity for 4,235 sqm by 2027, increasing to 9,657 sqm in 2031. In line with the NPPF and "town centre first" approach, the Council should seek to accommodate this forecast capacity in and on the edge of existing centres, ahead of any increase in out-of-centre retailing.
- 14.51 In the case of comparison goods we have also tested the impact on the capacity forecasts of applying a higher annual turnover 'efficiency' (floorspace 'productivity') growth forecast for the period 2025 to 2031. As explained above, the 'Baseline' scenario applies Experian's national 'efficiency' growth rate of +2.2% per annum from 2025 onwards. However it is our judgement in this case that the modern format floorspace in Milton Keynes, which is one of the top ranked centres in the UK, is capable of achieving 'efficiency' growth rates above Experian's national average forecasts. On this basis we have tested a higher 'efficiency' growth rate of 2.5% per annum for the period 2025 to 2031 under Scenario 2; and +3.0% per annum under Scenario 3. The impact on the capacity forecasts for the local authority wide area only are set out in the table below.

Table 16.7 Milton Keynes Council Wide Comparison Capacity (sqm net) – 'Sensitivity' test of applying higher turnover 'efficiency' growth rates for the period 2025 to 2031

	2022	2027	2031
BASELINE' SCENARIO:	-24,260	1,801	33,490
SCENARIO 2:	-24,260	-864	26,666
SCENARIO 3:	-24,260	-5,235	15,642

- 14.52 In summary the table shows that applying a slightly higher annual growth rate of +2.5% under Scenario 2 reduces the forecast comparison goods capacity to 26,666 sqm net by 2031; of which 9,521 sqm net is forecast

³² The average sales density of circa £6,000 per sqm at 2017 is assumed to be broadly equivalent to the average sales performance of retail units in prime shopping locations, and has been informed by different research evidence including the latest Mintel UK Retail Rankings Report. However, average turnover levels do inevitably vary between different locations, different retail formats and different operators. Where this is the case it will have implications for assessing the capacity for, and impact of new retail floorspace. The Council will therefore need to take this into account when considering applications for different operators and different types of retail floorspace in edge and out of centre locations. For example 'bulky goods' DIY retail warehouse operators typically trade at lower average sales levels, whereas electrical goods retailers and some fashion operators can achieve much high average turnover levels.

for Central Milton Keynes. Under Scenario 3 the total forecast capacity is reduced to 15,642 sqm by 2031, of which just 1,817 sqm net is forecast for CMK after taking account of all known commitments.

- 14.53 On this basis it is our judgement that the 'Baseline' forecast capacity of 33,490 sqm net for the Milton Keynes Council area represents a 'maximum' need for new comparison goods floorspace over the plan period. The forecast capacity could be lower in our view depending on the potential 'efficiency' growth of all existing and committed floorspace.

Summary

- 14.54 In summary, for convenience goods there no identified capacity up to 2031 across the Council area, after taking account of all know commitments. That said, there may be some instances where, subject to market demand, new convenience retail floorspace development could be appropriate to serve key housing areas within the local authority area in a sustainable manner. However such development is likely to be relatively small scale, serving the day-to-day needs of local residents. There may also be potential, subject to market demand, to improve the qualitative offer of food and convenience retailing in the main centres, provided that they do not have a significant adverse impact on the vitality, viability and delivery of the current offer in the respective PSA areas.
- 14.55 For comparison goods the 'Baseline' forecast capacity is for 33,490 sqm net of new retail floorspace by 2031. This is a significant reduction in comparisons floorspace capacity of 82,016 sqm gross up to 2026 as identified by the 2011 RCU. The forecast need for new retail floorspace, the scale and type of provision should reflect the relative role, function and hierarchy of centres (i.e. with CMK as the principal shopping and leisure destination in the local authority, complemented by the District and Local Centres that principally serve the needs of their local resident catchment populations).
- 14.56 Finally, it is important to restate that capacity forecasts beyond five years should be treated with caution, as they are based on various layers of assumptions and forecasts with regard to the trading performance of existing centres and stores, the growth in population and retail spending, constant market shares, etc. For example, we have demonstrated that relatively modest increases in the turnover 'efficiency' of all existing and committed floorspace from 2025 onwards could reduce the total forecast comparison goods capacity to between 15,642 sqm net (Scenario 3) and 26,666 sqm net (Scenario 2) at 2031. Furthermore, if the growth in Internet and multi-channel shopping is stronger than current forecasts suggest, then this could further "*dampen*" the future demand and capacity for new (physical) floorspace over the long term.
- 14.57 The Council should therefore take into account these different market trends and trading scenarios when assessing the quantitative and qualitative need for new retail floorspace over the medium to long term.

15 COMMERCIAL LEISURE NEEDS

- 15.1 The NPPF (paragraph 23) states that in drawing up Local Plans to ensure the vitality of town centres, local planning authorities should promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres. Against this background leisure uses can make a significant contribution to a town centre's vitality and viability. A good provision and choice of leisure facilities and uses can help to increase 'dwell times', footfall and turnover in centres, with significant benefits for both daytime and evening economies. However, forecasting the need for new commercial leisure uses is more complicated and problematic than for retailing, as the sector is highly complex and dynamic, and particularly sensitive to changes in economic, demographic, lifestyle and fashion trends. Consequently the methods and approaches developed to forecast the need for new commercial leisure floorspace and uses are more wide-ranging and less sophisticated than for retail capacity forecasts.
- 15.2 The NPPF recommends that need assessments for new leisure uses and floorspace should take account of both quantitative and qualitative considerations (paragraph 161). In this context our analysis focuses on the following key elements:
- a review of the key trends driving market demand in the sector over the last 10-15 years;
 - an audit of existing commercial leisure uses in the Council area to help identify any marked 'gaps' in provision;
 - a review of the results of the household survey to understand current commercial leisure participation rates and preferences across the Study Area; and
 - a broad economic assessment of the need for new additional leisure facilities across the main centres based on different datasets and accepted approaches.
- 15.3 For the purpose of our assessment we have necessarily focussed on the main commercial leisure uses that are widely accepted as making a significant contribution to the overall vitality and viability of town centres; namely food and beverage uses (Class A3-A5), cinemas and health clubs and gyms, and to a lesser extent ten-pin bowling, casinos and bingo halls.
- 15.4 Detailed tables on forecast commercial leisure capacity, including projections on expenditure and need are set out below.

Leisure Expenditure Growth

- 15.5 Like the retail market, the commercial leisure sector has experienced significant growth in consumer and market demand since the mid-1990s; fuelled by a buoyant economy, growing disposable income and low unemployment levels. Although the leisure sector has not been immune to the impact of the recent economic downturn, leisure activities remain an important lifestyle choice for many consumers who are prioritising leisure over other areas of spending.
- 15.6 **Table 17.1** shows the UK average expenditure per head per annum on commercial leisure services and the average for the defined Study Area based on Experian data. It shows that UK household spending on leisure services is dominated by the restaurant and café category (including pubs). This pattern is broadly repeated across all the zones.

Table 17.1 Estimates of Spending on Leisure Services in 2017 (£ per head)

	Accommodation	Cultural services	Games of chance	Hairdressing salons & personal grooming	Recreational & sporting services	Restaurants, cafes, etc.	Total
Zone 1	£188	£275	£150	£74	£95	£862	£1,643
Zone 2	£220	£328	£140	£95	£125	£1,001	£1,910
Zone 3	£178	£239	£121	£61	£87	£835	£1,521
Zone 4	£234	£338	£130	£97	£132	£1,055	£1,988
Zone 5	£237	£313	£147	£91	£125	£1,006	£1,920
Zone 6	£218	£306	£152	£83	£123	£963	£1,844
Zone 7	£210	£286	£141	£79	£107	£928	£1,751
Zone 8	£240	£324	£140	£121	£136	£1,122	£2,085
Zone 9	£296	£349	£157	£110	£155	£1,142	£2,209
Zone 10	£347	£368	£149	£130	£185	£1,227	£2,407
Zone 11	£306	£329	£162	£120	£143	£1,188	£2,248
Zone 12	£323	£337	£153	£123	£153	£1,183	£2,272
Zone 13	£273	£329	£145	£103	£143	£1,086	£2,080
Zone 14	£281	£348	£147	£111	£152	£1,128	£2,168
Study Area Average (£)	£254	£319	£145	£100	£133	£1,052	£2,003
(% of Total)	12.7%	15.9%	7.3%	5.0%	6.6%	52.5%	100.0%
MKBC Area Average (Zones 1-7, 9 & 10) (£)	£237	£311	£143	£91	£126	£1,002	£1,910
(% of Total)	11.7%	15.5%	7.1%	4.5%	6.3%	49.8%	94.9%
UK Average (£)	£243	£293	£156	£100	£129	£1,093	£2,014
(% of Total)	12.1%	14.5%	7.7%	5.0%	6.4%	54.3%	100.0%

Source: Experian, 2015 prices.

- 15.7 **Table 17.2** shows the most recent leisure spend projections by Experian Business Strategies (EBS) as set out in Retail Planner Briefing Note 15 (December 2017). EBS forecasts shows a decreasing growth forecast in the short term (2016-2018) rising to +0.8% in 2019 before stabilising over the longer term (from 2019) to between +1.1% (to 2024) and 1.2% per annum (by 2036). This forecast growth is higher than annual average historic growth rates for the period 1997-2015, when there was no growth in leisure spend.

Table 17.2 Actual & Forecast Growth in UK Leisure Spend (% per annum)

	2015	2016	2017	2018	2019	2020-2024	2025-2036
Leisure Spend Growth (%)	1.7	0.7	0.3	-0.1	0.8	1.1	1.2

Source: Experian Business Strategies, Retail Planner Briefing Note 15 (December 2017), Figure 1a and 1b

- 15.8 The base year expenditure per capita levels for leisure (**Table 17.1**) have been projected forward to 2031 using Experian's forecast annual growth rates (**Table 17.2**) and then applied to the projected population for each Study Zone to identify the total available expenditure on leisure and recreation goods and services (**Table 17.3**). As for the retail assessment, we have assessed total available leisure expenditure based on Experian's ONS's 2015-based Sub-National Population Projections.
- 15.9 **Table 17.3** shows that available commercial leisure expenditure across the broader Study Area is forecast to increase by 31.4% (+£436m) up to 2031. In comparison, and within the core Council Area (Zones 1-7; 9 and 10) this is set to increase by 34.2% (+171m). Growth in commercial leisure expenditure is greatest in Zone 9 with total expenditure forecast to increase by 51.14% over the study period to 2031 followed by Zone 2 (+34.7%).

Table 17.3 Total Available Commercial Leisure Expenditure: 2017 – 2031 (£m)

	2017	2022	2027	2031	Change: 2017-2031 (£m)	Change: 2017-2031 (%)
Zone 1	£50.8	£55.9	£62.0	£67.1	£16.3	32.1%
Zone 2	£102.5	£113.7	£126.9	£138.1	£35.6	34.7%
Zone 3	£45.3	£50.3	£56.1	£60.8	£15.5	34.2%
Zone 4	£78.5	£89.2	£95.1	£99.8	£21.3	27.2%
Zone 5	£55.9	£61.7	£68.5	£74.1	£18.1	32.4%
Zone 6	£40.9	£45.3	£50.2	£54.2	£13.2	32.3%
Zone 7	£48.8	£54.0	£59.9	£64.7	£15.8	32.5%
Zone 8	£174.6	£188.1	£205.3	£219.8	£45.3	25.9%
Zone 9	£54.1	£57.5	£71.4	£81.8	£27.6	51.1%
Zone 10	£23.1	£25.5	£28.2	£30.5	£7.4	31.9%
Zone 11	£133.7	£146.8	£162.9	£176.9	£43.2	32.3%
Zone 12	£208.8	£229.5	£254.8	£275.8	£67.0	32.1%
Zone 13	£242.7	£266.3	£294.8	£318.4	£75.7	31.2%
Zone 14	£127.6	£137.8	£150.6	£161.5	£34.0	26.6%
Study Area	1,387.3	1,521.5	1,686.8	1,823.3	436.0	31.4%
MKBC Area (Zones 1-7; 9 & 10)	£500	£553	£618	£671	£171	34.2%

Note: All monetary figures are expressed in 2015 prices.

- 15.10 Based on the broad leisure expenditure profile, the majority of the growth in leisure expenditure is likely to be weighted towards eating and drinking out. This highlights the potential to enhance the scale and quality of Class A3 uses in the Council's centres over the development plan period, subject to market demand.
- 15.11 In the context of the forecast growth in leisure spend, the following commentary identifies the potential 'gaps' in the commercial leisure offer of the Council's main centres and the likely need for new uses and facilities over the forecast period.

Cinema Need

- 15.12 Although cinema audiences grew significantly during the 1990s, the UK cinema market has traditionally been dominated by a handful of operators namely Cineworld (the UK's largest operator, with over a quarter of the cinema box office market), Odeon/UCI; Vue and Showcase (the UK arm of National Amusements of the USA). There was significant consolidation in the UK market in 2012 when Odeon acquired the BFI Southbank and a site from AMC; Vue acquired the Apollo cinema chain; and Cineworld acquired Picturehouse.
- 15.13 According to research by Dodona (a specialist market research consultancy in the cinema industry) at the end of 2016, the UK had 4,015 screens, 140 more than 2014, in 766 cinemas in the UK. Approximately three-quarters (77%) of the screens are in multiplexes. It should be noted that the number of cinemas has fluctuated, with a low of 697 in 2006 and a high of 769 in 2012. This has been influenced by the increase in the number of multiplex screens and the loss of 'traditional' cinemas. The rest of the market is mainly represented by smaller multiplex operators and independents which tend to operate non-multiplex cinemas (i.e. less than six screens) and screens in mixed-use venues (such as arts centres); including The Light, Curzon and Everyman cinemas.

Everyman cinema reported in early 2017 that demand for its “home from home” experience is growing around the UK with new opening planned for 2018 venues in York, Liverpool and Newcastle, as well as London’s Borough Market in 2020.

- 15.14 The cinema industry has not been immune from the recession and there have been some closures since 2008, although the majority have been smaller art centre venues rather than the larger chains. Notwithstanding this, the industry generally appears to be in good health and the UK is the second largest consumer market for filmed entertainment in the world after the USA. The latest research shows that box office revenue in 2016 in the UK exceeded £1bn for the fifth year in succession, based on 168.3m admissions. Overall the cinema sector has remained relatively resilient in the prevailing economic and consumer environment.
- 15.15 In recent years, cinema operators have also introduced changes to the cinema experience, including premium seating areas and better quality refreshments, such as alcohol and higher quality food. For example, Vue Cinemas introduced their ‘Evolution’ concept which provides a mix of seating types comprising bean bags and sofas, as well as regular seats. Cineworld has also introduced the ‘Screening Room’ concept, characterised by leather chairs and table service.
- 15.16 The most recent change to the industry – the transition to digital cinema technology – was one of the most fundamental shifts in the history of the sector, and has allowed the traditional cinema offer to expand to give audiences even greater choice in what they see. There has also been a growth in smaller (Digital) cinemas to serve smaller catchment areas. These Digital cinemas are more flexible and less “space-hungry”, as they do not require the large shopping auditoriums needed to accommodate traditional projectors. There are therefore opportunities for modern cinema offer to be provided in existing buildings. Examples include the HMV in Wimbledon which has a small Curzon cinemas above the store; Genesis in Whitechapel; The Grosvenor in Glasgow; Watershed in Bristol and the Lynton Cinema in Lynton.
- 15.17 At the other end of spectrum, smaller, boutique cinemas are also performing well. Focused on comfort, often by offering higher quality food, alcohol and larger reclining seats, and holding special screening events, these cinemas typically appeal to demographic that differs to that of the multiplexes. However, a further category of film screening has started to emerge: event cinema. Mirroring trends in retail, people are prepared to pay significantly more for a unique, bespoke film experience – particularly one that lends itself to be shared on social media such as Secret Cinema.
- 15.18 **Table 17.4** shows the cinema facilities within the Council Area. There are two main purpose-built cinemas, namely the Cineworld Cinema in Xscape Central Milton Keynes (16 screens including superscreen); and the Odeon Cinema in theMK1 Shopping & Leisure Park, Bletchley (11 screens). The existing multiplexes will be supplemented by the new Intu scheme (App Ref: 15/01074/OUT), which includes a 5-screen boutique cinema. Additionally, the Independent *Cinema Milton Keynes* currently show films at a number of venues including MK Gallery’s Events Space, The Cock Hotel; and the Scout Hall on Furze Way.
- 15.19 The household survey shows that 67.6% of respondents from the Study Area visited a cinema. The majority of respondents from the Study Area visited a cinema once every two month’s (35%) or once a month (28%).
- 15.20 The result also show that cinemas within the Council area retain a market share of 59.5% from within the overall Study Area and a higher market share of 97% within the core Council area (Zones 1-7, 9 & 10). As the table below shows, Cineworld at the Xscape Centre is the most popular cinema (attracting 34.8% of cinema-goers from the Study Area and 62% from the core Council area).

Table 17.4: Cinema Facilities in the Council Area

Cinema	% Visits from Study Area	% Visits from MKC Area (Zones 1-7, 9, 10)
Cineworld, Xscape, Marlborough Gate, Milton Keynes	34.8%	62.0%
Odeon, MK1 Shopping & Leisure Park, Bletchley, Milton Keynes	24.8%	35.0%
Other Locations	40.5%	3.0%
Total	100.0%	100.0%

Source: HTIS 2017

- 15.21 According to Dodona, in 2016, the UK average was 6.3 screens per 100,000 people, up from 6.1 screens in 2014. Based on the current high retention rate of 97% for the core Council area (Zones 1-7, 9 & 10) **Table 17.5** shows the requirement for additional cinema screens.

Table 17.5: Potential Capacity for New Cinema Screens in the MKC Area

	2017	2022	2027	2031
Potential Cinema Catchment Population (Zones 1-7; 9 & 10)	259,121	275,548	290,440	300,204
Cinema Screen Density (screens per 100,000 persons) based on Southern Region	6.3	6.3	6.3	6.3
Cinema Screen Potential	16	17	18	19
Existing Screens	28	28	28	28
Net Screen Potential	-12	-11	-10	-9

Notes: Screen density is used to measure screen provision in a given area. Existing cinema screens account for key cinema facilities only. The net screen potential is derived by subtracting the number of existing screens from the cinema screen potential.

- 15.22 The forecasts show that based on population growth within the Study Area there is no quantitative capacity to support new cinema screens over the study period until 2031. Taking into account the proposed 5-screens planned as part of the Intu scheme (App Ref: 15/01074/OUT) there is no cinema capacity within the foreseeable future.
- 15.23 In response to the question as to what improvements could be made to commercial leisure offer that would potentially encourage people to participate more in leisure activities; only 0.1% of respondents from the core Council area stated that they would like a multi-screen cinema. This demonstrates that respondents are generally satisfied with the provision and choice of cinemas.
- 15.24 In our judgement, Milton Keynes benefits from a good quality and choice of cinemas, as reflected by the relatively strong retention levels of cinema-goers in the area. Whilst there is no forecast screen capacity until 2031, current trends show that most cinema operators are currently expanding their venue portfolios into regional towns. There may therefore be potential market demand from new cinema operators for representation in Milton Keynes. If demand does exist then this should be directed to the City Centre first in accordance with national and local policy objectives.

Eating & Drinking Out

- 15.25 The food and beverage sector, including restaurants, cafes, bars and pubs (Class A3, A4, and A5), provide an increasingly important part of the town centre's wider offer and economy. They also complement other town centre uses, particularly shops, offices and cinemas, helping to lengthen 'dwell times' (the time people spend in centres) and increase expenditure as part of the same trip.

15.26 As highlighted in **Section 3**, average household expenditure on leisure services in the UK is largely dominated by eating and drinking out. This sector has remained buoyant over time and the year-on-year forecasts for growth by Experian are strong.

15.27 The following provides a summary of some of the key trends driving changes in the food and beverage sector over recent years.

- **Pubs and Wine Bars** - pub operators have widened their food and non-alcoholic beverage offer, resulting in the growth of so-called “gastro-pubs” in competition with more established restaurants, and the rise in ‘micro pubs’. Notwithstanding this the sector has also been characterised by increasing consolidation and closures. Recent research by CAMRA³³ also suggests that on average around 21 pubs closed every week in the UK. The sale of pubs for conversion to alternative uses has also increased over recent years, particularly for convenience retailing (e.g. Tesco Express and Sainsbury’s Local).
- **Restaurants** – this sector has also experienced mixed fortunes during the economic downturn. Some of the key trends driving change in this sector include an increase in ‘eating at home’, which has increased sales for take-aways and deliveries. At the same time customers are increasingly basing their decisions to eat out on ‘value for money’, but not at the expense of quality in terms of service, food and the overall experience. Recent successes include Jamie’s Italian, Bill’s and Cote, with branded restaurants increasing their share in the market. There has also been a growth in ‘all-you-can-eat’ style restaurants which are aimed at offering value for money (examples include the Taybarns brand owned by Whitbread). In broad terms, and according to recent research³⁴, future F&B growth is most likely to be dominated by multiple operators expanding their presence across the UK.
- **Cafés/Coffee Shops** – This sector has experienced strong growth over the last five years. According to Mintel research, the UK coffee shop market rose by 37%, up from £2.4 billion in 2011 to reach £3.4 billion in 2016. What is more, between 2015 and 2016 sales increased by 10.4% – the biggest year-on-year boost witnessed in the last five years. The market over the next five years is forecast to grow a further 29%, to reach £4.3 billion³⁵. Estimated at 22,845 outlets, the total UK coffee shop market delivered a growth of 6% in outlets in 2016. Costa Coffee, Starbucks Coffee Company, and Caffè Nero remain the UK’s leading chains with a 53% outlet share of the branded coffee shop market. Market leader Costa operates 2,121 UK outlets, adding 129 units in 2016, and Starbucks and Caffè Nero operate 898 and 650 UK outlets respectively. Leading chains continue to expand and enjoy positive like-for-like sales growth, albeit at a slowing pace. However small and medium sized boutique chains such as Coffee#1, Joe & the Juice, and Taylor St. Baristas are gaining momentum and driving the comparable sales growth across the sector, ahead of the leading chains. Increased merger and acquisition activity throughout 2016 signifies the strength of the vibrant coffee shop market in the UK. Activity such as Whitbread’s 49% acquisition of Pure, Tchibo’s acquisition of Matthew Algie, and Caffè Nero’s purchase of Harris+Hoole signals further market convergence.³⁶ Notwithstanding the rise of the multiples, there has also been growth in independent and specialist cafés and coffee houses, particularly those serving a more luxury or specialist offer (e.g. organic and Fairtrade). The strong independent coffee sector has fuelled many new start-up businesses in local centres. While many forecasters considered the café market to be saturated a few years ago, Allegra³⁷ reveals that after 18 years of considerable continued growth, the coffee shop market is one of the most successful in the UK economy and is set to outnumber pubs by 2030 as coffee shops become the new local.

³³ Campaign for Real Ale (CAMRA) 2018: www.camra.org.uk/pubs

³⁴ Cushman & Wakefield – UK Food & Beverage Market Sustainable Growth – H1, 2017

³⁵ Grande growth: UK coffee shop sales enjoy a growth high – Mintel (12/04/2017)

³⁶ UK Coffee Leader Summit - Project Café 2017 UK, by Allegra Strategies, ‘Yet More Growth in UK Coffee Shop Market as Coffee Shops Become the New Local’ (20/01/2017)

³⁷ Allegra, ‘Yet More Growth in UK Coffee Shop Market as Coffee Shops Become the New Local’ (20/01/2017), Ibid

- 15.28 The household survey identified where people living in the Study Area currently chose to eat and drink, and whether there are potential 'gaps' in the current offer. The survey shows that 80.8% of respondents from the Council area visit restaurants and cafés. Furthermore, some 48% of respondents from the Study Area visit pubs/bars/nightclubs.
- 15.29 Focussing on the MK Council area only (i.e. Zones 1-7, 9 & 10) the survey shows that 77.3% of respondents in the local authority area visit restaurants and cafés. Furthermore, some 37.8% of respondents from the Study Area visit pubs, bars and nightclubs.
- 15.30 From within the core Council area (Zones 1-7, 9 & 10) the survey shows strong retention of expenditure (96.6%) for eating and drinking out.
- 15.31 In terms of nightlife (pub/ bar/ nightclub/ music venue), the headline findings show a relatively poor retention from the Study Area. Milton Keynes City Centre is the most popular (16.7%), followed by Stony Stratford (3.2%) and Newport Pagnell (3.1%). From within the core Council area Milton Keynes is also the most popular (37.0%), followed by Newport Pagnell (10.0%) and Stony Stratford (6.9%)
- 15.32 Evidence from other centres in the UK shows that improving a town centre's food and beverage offer can significantly increase the attraction of daytime and evening economies for different customer profiles, as well as generating higher footfall, dwell times and increased expenditure in centres.
- 15.33 In summary, the qualitative 'gap' analysis shows that in response to the question as to what improvements could be made to the Study Area's commercial leisure offer that would encourage people to participate more, 0.9% of respondents suggested more quality restaurants, and 0.1% suggested more pavement cafés. Furthermore, 0.9% of respondents stated that they would like more nightclubs. From within the core Council area 1.7% of respondents suggested more quality restaurants, and 0.1% suggested more pavement cafés. The responses to the survey suggest that respondents are generally satisfied with the varied and diverse range of the Council area's offer.
- 15.34 Turning to the potential need for new F&B uses (floorspace), the total available expenditure for food and drinking in the core Council area (Zones 1-7, 9 & 10) is £263m in 2017. This is set to increase by 34.1% over the plan period to 2031 as shown in **Table 17.6**.

Table 17.6: Total Leisure Spend (£m)

	MKBC Area (Zones 1-7; 9 & 10): Total Leisure Spend (£m)				Change: 2017-2031	Change: 2017-2031
	2017	2022	2027	2031	(£m)	(%)
Accommodation	60.4	66.7	74.7	81.1	£20.8	34.4%
Cultural services	82.6	91.4	102.1	110.7	£28.1	34.1%
Games of chance	37.8	41.8	46.7	50.7	£12.9	34.2%
Hairdressing salons & personal grooming	23.6	26.1	29.2	31.7	£8.1	34.3%
Recreational & sporting services	32.4	35.8	40.1	43.5	£11.1	34.3%
Restaurants, cafes, etc.	263.2	291.2	325.5	353.1	£89.9	34.1%
Total	500.0	553.0	618.4	670.9	£170.9	34.2%

- 15.35 The household survey has indicated a relatively strong retention (96.6%) of expenditure for eating and drinking out from the core Council area (Zones 1-7; 9 & 10). An appropriate strategy should seek to maintain and increase this market share over the forecast period to 2031.
- 15.36 On this basis, the available expenditure has been projected forward to 2031 and any residual expenditure available to support new A3-A5 floorspace over the development plan period will be derived from the difference

between the forecast growth in 'current' (survey-derived) turnover levels and the growth in 'benchmark' turnover after applying robust year-on-year 'productivity' ('efficiency') growth rates to all existing floorspace (which is assumed to be around 1% per annum).

- 15.37 The resulting residual expenditure has been converted into floorspace projections using a 2017 assumed average sales density of £5,000 per sqm net (inflated by 1% per annum over the period to 2031). **Table 17.7** summarises the high level floorspace capacity forecasts after accounting for all known Class A3-A5 commitments³⁸.

Table 17.7: Eating & Drinking Out – Projected Gross Floorspace (sqm)

	2022	2027	2031
Total Available Leisure Expenditure in MKBC Area (Zones 1-7, 9 & 10) (£m)	291.2	325.5	353.1
Current retained turnover (£m)	281.3	314.4	341.1
Benchmark turnover (£m)	267.2	280.9	292.3
NET RESIDUAL (£m)	14.0	33.6	48.8
Turnover of Committed Floorspace (£m)	29.7	31.2	32.5
NET RESIDUAL EXPENDITURE AFTER COMMITMENTS: (£m)	-15.7	2.3	16.3
Capacity (sq m gross) based on a sales density of: £5,000/sqm net	No Capacity	602	4,053

Note: Gross to net ratio applied of 70%

- 15.38 We forecast no capacity up to 2022 (after accounting for commitments) with emerging capacity in 2027 of up to 602 sqm gross rising to 4,053 sq m by 2031. This forecast need should be directed to the MK Central and the District Centres (Bletchley, Wolverton, Westcroft & Kingston) first to help increase competition and choice, and to help underpin their daytime/evening economies in accordance with national and local policies.
- 15.39 As for other commercial leisure uses, the need for new cafés, restaurants and bars is highly dependent on the level of market demand and confidence in town centres as trading locations. In simple terms the more successful, vital and viable a centre is, the more likely it will be that café and restaurant operators will want to locate there. As the analysis has shown there is already a relatively strong demand and retention from within the catchment. As such, the improvements focus on qualitative improvements across centres, principally where there is lower provision and choice of these services.

Health & Fitness Need

- 15.40 The health and fitness market has generally performed well during the economic downturn. The latest statistics from the Leisure Database Company (LDC)³⁹ show that over the twelve month period to March 2017, the industry has grown its total market value by 6.3% to £4.7 billion, and its member base by 5.1% to 9.7million. According to the LDC there were an estimated 6,728 fitness facilities in the UK up from 6,435 facilities in 2016, which represented a 4.6% net increase from the previous year. The main operators in the market currently include:

³⁸ Refers to extant commitments detailed in Section 16 previously and where there is specified reference to A3- A5 floorspace provision. Specifically it refers to the following: Planning Ref: 14/02948/FUL – 910 sqm gross A3/A4; Planning Ref: 06/00220/MKPCO – 800 sqm gross A3/A4; Planning Ref: 15/01600/FUL – 3,015 sqm gross A3, 694 sqm gross A4; Planning Ref: 15/01074/OUT – 2,663 sqm gross, A3).

³⁹ Leisure Database Company : The 2017 State of the UK Fitness Industry Report

- Esporta, Greens & David Lloyd Leisure – at the premium end of the market focus on health, racquet and tennis clubs;
- Virgin Active & Nuffield Health (previously Cannons) – dominate the mid-range family-oriented health and fitness market; and
- LA Fitness, Fitness First and Bannatyne’s Health Clubs – operate smaller in-centre clubs at the more value end of the market.

15.41 However, the most significant growth in the sector in recent years has been fuelled by value and budget operators. The new wave of (“no frills”) fitness clubs is growing steadily and lead by Pure Gym with 176 gyms in 2017. Other popular low cost brands include Anytime Fitness, EasyGym, Fitness 4 Less, Fitspace, TruGym and SimplyGym. The low cost business models is based on 24-hour opening, discounted monthly subscriptions (of between £10 and £20 on average) and ‘pay as you go’ membership. According to LDC, and in 2017, the low cost gym sector accounted for 15% of total private clubs and 35% of private sector membership.

15.42 Overall, the proportion of the population in 2017 with a gym membership in the UK was estimated at 14.9%, up from 14.3% in 2016 and 13.7% in 2015. According to LDC, the average number of members per club in the UK is estimated to be 1,426, which takes into account the average for independent venues (726 per club) and leisure chains (2,198 per club). For the larger fitness chains (e.g. David Lloyds, Virgin, LA Fitness, etc.) the average club membership increases to 2,897, while budget chains are even higher at 3,452 members.

15.43 The rapid growth of this sector has also been characterised by a marked shift in the location of clubs from out-of-centre locations to town centres, often as part of wider mixed use developments. This can help to create a wider range of attractions and activity in town centres, particularly in the evenings and at weekends.

15.44 **Table 17.8** summarises the current representation of the main national, regional, independent, privately-owned as well as Council-owned leisure centres health and fitness operators.

Table 17.8: Leisure Centres, Fitness Clubs, and Gyms in the Council Area

Type	Name	Private Sector	Public Sector
Leisure Centre	Bletchley Leisure Centre		√
	Brook End Sports Centre		√
	Leon Leisure Centre		√
	Middleton Pool and Fitness Centre		√
	Oakgrove Leisure Centre		√
	Shenley Leisure Centre		√
	Wolverton Swimming & Fitness Centre		√
	Woughton Leisure Centre		√
Fitness Centre	Bannatyne Health Club & Spa	√	
	Bodystreet, MK Station	√	
	Core Fitness Centre	√	
	Courtside Sport & Fitness Facility	√	
	Fitzone	√	
	Kingston Gymnastics & Fitness Centre	√	
	Livingwell Health Club	√	
	Nuffield Health, Kents Hill Park	√	
	Nuffield Health Fitness & Wellbeing Gym	√	
	Spirit Health Club	√	
	Stantonbury Arts & Leisure	√	
Gym	Anytime Fitness	√	
	Atlas Fitness	√	
	Body Limits Clinic & Gym	√	
	Crossfit Chain Reaction	√	
	David Lloyd	√	
	DW Sports Fitness	√	
	Energie Fitness for Women	√	
	Fitness First	√	
	Freedom Fitness	√	
	Gym MK	√	
	Kiss Gyms	√	
	LA Fitness	√	
	Olney Gym	√	
	PureGym	√	
	The Gym	√	
	Virgin Active	√	
	Xercise4Less	√	
	1life Health & Wellbeing Studio	√	

Source: Carter Jonas Research

15.45 **Table 17.8** shows a good representation of national multiple operators within the Study Area. There are also a number of independent facilities, which are supplemented by public sector facilities.

- 15.46 In terms of fitness/health activity participation rates, the household survey results show that 27.1% of respondents in the core Council area (Zones 1-7, 9 & 10) visited a gym, health club or sport facility. Of these, 59.8% of respondents from the core Council area visited more than once a week and 25.8% visited once a week. The most popular leisure facilities are:
- **Xercise4Less in Winterhill**, which is achieving a market share of 10.6% from the Study Area (19.3% from the core Council area);
 - **DW Sports & Fitness Club in Denbigh North**, which is achieving a market share of 7.4% from the Study Area (4.9% from the core Council area);
 - **David Lloyd in Milton Keynes**, which is achieving a market share of 7.3% from the Study Area (14.1% from the core Council area); and
 - **PureGym in Winterhill**, which is achieving a market share of 6.7% from the Study Area (14.1% from the core Council area).
- 15.47 In terms of improvements to the Council's leisure offer, only 0.7% of respondents from the core Council area suggested they need more and/or better health clubs/gyms and 8.5% stated that they would like a swimming pool. This would appear to indicate that respondents are generally satisfied with the existing current offer, although it does highlight the potential need for additional swimming pool provision.
- 15.48 In terms of the need for new health club/ gym facilities, the forecast growth in population between 2017 and 2031 is in the order of 42,354 for the core Council area. Applying the participation rate for gym and health club activities identified for the study (27.1%) results in some 11,478 potential new gym members over this period. Based on average membership levels for key commercial gym operators such as David Lloyd and LA Fitness (2,897 average members per facility) or a budget gym (3,452 average members per facility) this could potentially support 4 private or 3 budget gyms over the forecast period.

Bingo & Gambling Needs

- 15.49 Gambling represents a significant element of the leisure industry. The main sectors of the gambling industry comprise 'games of chance' (i.e. bingo clubs, casinos, betting shops, amusement arcades, etc.). We briefly describe the key trends in this sector and the forecast need/ demand for new facilities in the Council area, if any, based on the available evidence.
- 15.50 In terms of **Bingo Halls**, the latest research by The Gambling Commission (November 2015) indicates that there are over 599 licensed premises in operation in the UK, which is a reduction from 653 recorded in 2014. Gala Leisure and Mecco Bingo are the leading operators accounting for over a third (36.9%) of all premises. Research by Mintel indicates that the industry has experienced a fall in revenues and admissions over recent years as a result of legislative changes (such as the ban on smoking in public places), the impact of the economic downturn and the growth of online gaming. In response to falling admissions, bingo operators are increasingly taking advantage of the online market and embracing smart-phone technology through new 'app' development. This forms part of a wider trend and growth in 'remote/online' gambling, which including gambling activities through the internet, telephone, radio, etc. Bingo operators are also increasingly looking to diversify their customer profile, and are marketing their clubs at a younger, predominantly female audience. As a result there has been an increase in the number of younger and more affluent bingo players over recent years, particularly as deregulation has enabled clubs to offer bigger (national) prizes. The above has resulted in the closure of many bingo halls across the UK.

- 15.51 For **Casinos** research shows that there were some 147 in the UK in September 2015. The number of premises has remained fairly static over the past five years⁴⁰. This sector is dominated by two companies: the Rank Group (incorporating Grosvenor Casinos and Gala Coral Casinos) and Genting UK. There has been consolidation of the sector in the past few years, including Rank Group's purchase of Gala Coral Casinos making it the largest operator in the UK. While casino attendance has grown from 18.24m in 2012 to 20.44m in 2015, attendance dropped by 2.6% from 2014 (20.99m). The increase in attendance since 2012 is largely explained by larger new casino venues granted licences under the 2005 Gambling Act. As far as we are aware there is only one casino facility located within the Council area; namely The Casino MK in the Xscape Centre.
- 15.52 **Betting shops** do represent a growing market in the gambling sector and are ever present on the UK's high streets. There are approximately 9,000 betting shops in the UK, of which around half are operated by Ladbrokes and William Hill. Regulatory changes in 2015 led to a fall in revenue and profit. In response, William Hill announced their intention to close 150 of their 2,300 outlets. As gambling activities continue their shift to online channels, demand for physical outlets could reduce in the future. The presence of betting shops in high streets is a contentious issue, particularly the perceived social issues that are linked to this particular activity (e.g. anti-social behaviour) and their concentration in deprived areas. The reclassification of betting shops from A2 to Sui Generis was aimed at giving local authorities greater control on managing the number of outlets in town centre.
- 15.53 The household survey results indicate that visiting bingo halls, casinos and/or bookmakers is not a major leisure activity for the majority of respondents living within the core Council area; only 6.5% of respondents stating that they visit these facilities. Of these, some 36.1% of respondents from the core Council area visit once every two months and 20.0% visit once a month. Only 7.0% indicated that they frequent this activity once a week. The household survey indicate that the most popular venues include The Casino MK in the Xscape Centre (44.9%) and Gala Bingo on Midsummer Boulevard (35.7%).
- 15.54 In our judgement, there is no demonstrable need to enhance existing provision to improve competition and choice at the local level, although this will be subject to market interest and demand from other bingo and casino operators. If demand arises in the future, we advise that this should be directed to MK Central first in accordance with national and local plan policy. Given that current trends for bingos and casinos show activity moving online instead of physical venues, future demand for new venues is expected to be very limited.
- 15.55 Finally, in response to the question as to what improvements could be made to commercial leisure offer that would encourage people to participate in more leisure activities, no respondents to the household survey stated that they would like a casino and only 0.1% of respondents from the core Council area stated that they would like a new bingo venue. These findings further demonstrate the relative lack of demand for bingo and gambling facilities in the Council area.

Other Commercial Leisure Needs

- 15.56 Other commercial leisure facilities can be grouped together under '*family entertainment*' venues which include paid activities that appeal to adults and children; such as, for example, tenpin bowling, roller skating, ice skating, and similar uses.
- 15.57 **Tenpin bowling** is possibly the most popular of this category and has been established as a commercial leisure activity in the UK for over 40 years. It remains a strong family and group activity. Research shows that there are currently over 321 bowling centres in the UK. This sector benefitted from a period of growth from the mid-1990s onwards, fuelled by the development of large entertainment 'boxes' and leisure parks at one end of the spectrum,

⁴⁰ Source: Gambling Commission Industry Statistics 2016.

and smaller independent specialist bowling facilities at the other end. A number of the successful bowling facilities opened over the last 15-20 years tend to form part of larger leisure complexes that include multi-screen cinemas, restaurants and nightclubs. It is the critical mass of leisure uses under one roof or as part of leisure parks that helps to underpin the viability of ten-pin bowling centres, which can struggle as standalone attractions. Examples of the smaller specialist operators include All Star Lanes which operate five bowling venues in the UK (four in London and one in Manchester) and largely targets the corporate/private hire market. Bloomsbury Bowl Lanes also operates from smaller venues with sites in Bloomsbury (8 lanes) and Bristol (5 lanes). The company offers a 1950's American-themed bowling venue with ancillary karaoke rooms, venue rooms for hire, DJ booths, bars, small scale cinema and a venue for bands and live performers/comedy nights.

15.58 There are two main ten-pin bowling facilities located in the Council area namely:

- Hollywood Bowl, Xscape, Marlborough Gate; and
- Tenpin Bowling, South Row.

15.59 The household survey indicates that 28.2% of respondents from the core Council area partake in family entertainment activities. Family activities are carried out less frequently than other leisure activities, with 27.1% of respondents carrying out family 'activities' once every two months, and 33.5% once every six months. Only 3.9% of respondents visit family attractions once a fortnight and 0.4% visit once a week. The main family entertainment venues in the Council area are detailed in **Table 17.9**.

Table 17.9: Family Entertainment Venues

Location	% Visits from the core Council area (zones 1-7; 9 & 10)
Hollywood Bowl, Xscape, Milton Keynes	55.4%
Xscape, Milton Keynes	25.8%
Planet Ice, Leisure Plaza, Milton Keynes	1.1%
iFLY, Xscape, Milton Keynes	1.0%
The Casino MK, Xscape, Milton Keynes	0.3%
Arts Gateway MK, Arts Central, Milton Keynes	0.2%
Other Locations	16.2%
Total	100.0%

Source: HTIS 2017

15.60 As **Table 17.9** shows, Hollywood Bowl in the Xscape Centre is the most popular venue across the Council area, followed by the Xscape Centre.

15.61 In response to the question as to what improvements could be made to commercial leisure offer that would encourage people to participate more in leisure activities, 3.3% of respondents in the core Council area stated that they would like more facilities for children, and 1.0% stated they would like a new tenpin bowling facility. As such, in terms of meeting future needs, the Council area could benefit from a wider range of family activity venues, although this will be subject to market demand and any demand should be directed to town centre locations first.

Cultural Activities

15.62 Cultural activities include a broad range of activities that are focused on the arts and historic attractions. For the purpose of this assessment, consideration is focussed on the provision of theatres, music venues, and

historic/cultural attractions across the Council Area. Current cultural venues (including theatres, music venues, museums, and art galleries) are set out in **Table 17.11**.

Table 17.11: Key Cultural Venues in the Council Area

Venue Type	Name
Theatre and Music	Milton Keynes Theatre, Marlborough Gate
	Stantonbury Theatre, Stantonbury
	The Stables, Stockwell Lane
	Chrysalis Theatre, Japonica Lane
	The Venue MK, Fyfield Barrow
	Arena MK, Stadium Way, Bletchley
Museum	Milton Keynes Museum, McConnell Drive
	The National Museum of Computing, Block H, Bletchley Park
	Bletchley Park Museum, Sherwood Drive
Art Gallery	MK Gallery, Midsummer Blvd
	Artfull, Silbury Blvd
	Whitewall Galleries, Midsummer Blvd
	Castle Galleries, Acorn Walk
	Hanoi Art House, Cadman Square
	Milton Keynes Arts Centre, Parklands
	Westbury Arts Centre, Foxcovert Road

Source: Carter Jonas Research

- 15.63 Cultural venues in the Council Area are relatively extensive and are mainly located within or near to Central Milton Keynes.
- 15.64 The results of the household survey indicate that 25.7% of respondents from the core Council area visit museums, galleries and place of historical or cultural interest. Theatres, concert and music venues are even more popular with some 50.0% of respondents taking part in these activities.
- 15.65 The household survey confirms that this form of activity is carried out infrequently, with the majority (32.7%) of respondents visiting places of cultural interest once every six months, and the majority (36.4%) visiting theatres, concerts or music venues also once every six months, from within the core Council area. The most popular attractions in the core Council area are:
- **Milton Keynes Museum** - which attracts 43.2% of those visiting cultural and historic venues;
 - **Bletchley Park Museum** - attracts 9.6% of respondents; and
 - **National Computing Museum** - attracts 2.8% of respondents.
- 15.66 With regard to theatres and music venues, the Milton Keynes Theatre (85.3%) is the most popular, followed by The Stables (9.2%). The survey evidence confirms that MK has a good range and choice of venues and facilities of cultural interest, and these venues make a significant contribution to the broad visitor economy of the area.

Hotel Provision

- 15.67 Hotel provision across the Study Area is largely focused within or around Central Milton Keynes and is supported by both national and independent operators with the former having a strong presence. Hotel provision is set out in **Table 17.12**.

Table 17.12: Hotel Provision Across the Study Area

Type	Name
Hotel	Holiday Inn Milton Keynes Central, Saxon Gate
	Travelodge Milton Keynes Centre, Grafton Gate
	Hotel Novotel Milton Keynes, Saxon Street
	Premier Inn Milton Keynes Central, Secklow Gate West
	Premier Inn Milton Keynes Central, Savoy Crescent
	Holiday Inn Express, Tongwell Street
	Premier Inn Milton Keynes East Willen Lake
	Travelodge Milton Keynes at the Hub Hotel, Midsummer Blvd
	Parkside House Hotel, Newport Road
	Best Western Milton Keynes, Broughton Village
	Jurys Inn, Midsummer Blvd
	Travelodge, Shenley Church End
	Hilton Milton Keynes, Timbold Drive
	Hotel Mercure Milton Keynes Abbey Hill, The Approach
	Premier Inn Milton Keynes South-West, Shirwell Crescent
	Holiday Inn Milton Keynes East M1, London Road
	Double Tree by Hilton Hotel, Stadium Way W
	Premier Inn Milton Keynes South, Lakeside Grove
	Red Lion Hotel
	Harben House Hotel
	Swan Revived Hotel
	Ramada Milton Keynes
	Peartree Lodge Waterside
	Ramada Junction 1415 Welcome Break M1
	Hotel Campanile Milton Keynes, Fenny Stratford
	The Cock Hotel
	Different Drummer

Source: Carter Jonas Research

- 15.68 In summary, the local authority area is well served by a range of national operators. As such, it is considered that there is an adequate provision and choice of hotels in the Council area, Where hotel operators have a requirement to increase their existing representation in the area, or are seeking new representation, they should be directed to town centre locations first in compliance with the NPPF.

Summary

- 15.69 In summary the commercial leisure industry faces considerable challenges and pressures. It is clear that consumers are becoming increasingly selective in terms of where and how they spend their discretionary leisure

spending. There will also be a continued growth in at-home activities due to the advances in computers, tablets, television, gaming and audio technology. The challenge for town centres and leisure operators in the future is to attract customers away from their homes.

- 15.70 Our review of the Council's commercial leisure sector and offer, and the results of the household survey indicate that there is a relatively good level and choice of leisure facilities across the Milton Keynes area.
- 15.71 In terms of cinema provision, the survey results have identified that a high proportion of respondents frequently visit the cinemas within the Study Area. Retention levels from within the core Council area are high. The quantitative needs assessment forecasts no additional capacity for new cinema screens by 2031. However, where market demand from cinema operators does exist that will complement the current and planned provision, this should be directed to CMK and other main centres first in accordance with national and local plan objectives.
- 15.72 The total available expenditure for food and drink in the core Council area is forecast to increase by +34.1% (+£89.9m) over the plan period to 2031. This growth results in the potential floorspace capacity of 4,053 sqm gross by 2031, after accounting for commitments. The potential for new food and beverage facilities in Milton Keynes is, however, ultimately dependent on the level of market demand and interest from operators for representation in the area and its main centres.
- 15.73 There is also a strong provision of health and fitness facilities across the core Council area. The population within the core Council area is set to increase by 42,354, which could potentially support 3-4 additional gyms/health club facilities based on current participation rates. However, as for other commercial leisure uses, the prospect for new facilities will inevitably be determined by the level of market demand and interest from operators.
- 15.74 In terms of addressing future needs, the CMK could also benefit from a slightly wider range of family entertainment venues and activities, subject to market demand.
- 15.75 In terms of hotel provision, the Council area is well served by a range of national operators. As such, it is considered that there is an adequate provision of hotels in the Council area, and any demand for representation in the Council area from existing and new operators should be directed to town centres first in compliance with the NPPF.
- 15.76 Finally, the core Council area benefits from a diverse range of arts and historic attractions, all of which make a significant contribution to the visitor economy. These need to be maintained and promoted in order to attract further visitors to the area.

16 RECOMMENDATIONS AND EXECUTIVE SUMMARY - TOWN CENTRE STRATEGIES

- 16.1 This section provides a summary of the relative health, role and function of the Council's main centres, the forecast quantitative/qualitative need for new retail floorspace to 2031; and the potential for identified sites in CMK to meet the identified needs 'in full' in compliance with paragraph 23 of the NPPF.
- 16.2 At the outset it should be stated that Milton Keynes City Centre is the principal shopping destination in the City Council area and is supported by an extensive range of non-retail services, as well as leisure, cultural and community uses. As such, we recommend a robust 'town centre first' approach to ensure that larger scale retail development is focused in the City Centre and principally in the defined PSA. This will help to strengthen the City Centre's role as a key sub-regional comparison goods shopping destination in line with Local Plan policy objectives.

Meeting the Identified Need – Comparison Floorspace

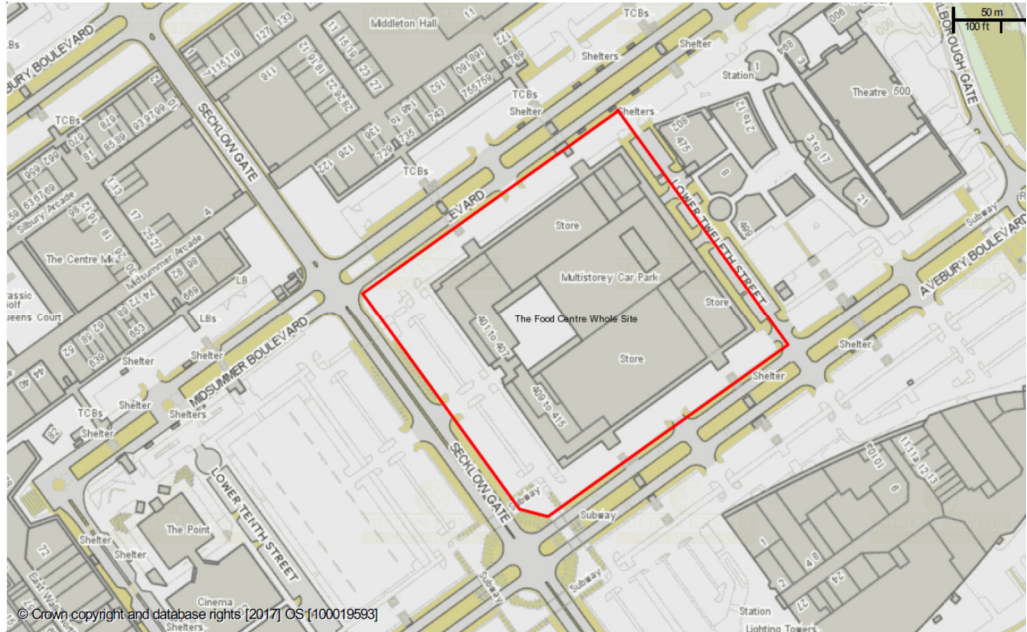
- 16.3 Based on the key baseline assumptions that the retail market is in 'equilibrium' at the base year (2017) and that market shares remain constant over the study period, the quantitative capacity assessment set out in Section 16 has shown that there is no forecast convenience capacity up to 2031 across the Council area.
- 16.4 For comparison goods there is a maximum capacity under the 'Baseline' Scenario for 33,490 sqm net of floorspace by 2031. Notwithstanding this we have also demonstrated that relatively modest increases in the turnover 'efficiency' of all existing and committed floorspace from 2025 onwards could reduce the total forecast comparison goods capacity to between 15,642 sqm net (Scenario 3) and 26,666 sqm net (Scenario 2) at 2031.
- 16.5 Drawing on the accumulated research and evidence we provide robust advice and recommendations on the potential for the Council to accommodate the maximum identified need under the 'Baseline' Scenario over the plan period. Our assessment is based on our market knowledge of the current businesses models and requirements of retailers and commercial leisure operators; and the likely scale, format and location of space that they will be seeking. Our assessment is also based on our understanding of the potential availability and suitability of key sites in the Council area drawing on evidence provided by the Council. The identified capacity should be directed to these City and District centres first as sequentially preferable locations in compliance with the NPPF and the 'town centres first' approach for new investment and development.
- 16.6 Based on our assessments of the main centres and discussions with the local planning authority and key stakeholders, we consider that the following two sites, both located in Central Milton Keynes, are capable of accommodating the identified need for comparison goods:

The Food Centre and Car Park

- 16.7 This site has an area of approximately 4.02 ha (40,181 sqm), and it is located on the Midsummer Boulevard in Central Milton Keynes. The Food Centre is primarily vacant and is in need of new investment. It would represent a major redevelopment opportunity and would be highly desirable to help strengthen the overall vitality and viability of CMK. The size of site in itself could provide the potential to accommodate the forecast need for comparison floorspace by 2031.
- 16.8 The above notwithstanding, we understand that the different land ownerships across the site could represent potential barriers to its comprehensive regeneration, and there are therefore uncertainties about the potential redevelopment options and the end uses. We understand that the owners are exploring options for the site,

including bringing it back into commercial use for new retail, leisure, residential, hotels and night time economy uses, such as nightclubs and bars. In our judgement, the reconfiguration of the site to include these commercial uses would help to improve the relationship between the site, the surrounding uses and buildings, and the public realm. The extent of the Food Centre site is shown below.

Figure 18.1: The Food Centre and its car park



Temporary car park

16.9 This site has an area of 2.14 ha (21,440 sqm), and it is bound by Midsummer Boulevard, Secklow Gate and Avebury Boulevard in Central Milton Keynes. The site area is currently in use for a temporary car park. There is no planning history associated with this site.

Figure 18.1: The Food Centre and its car park



Meeting the Identified Need – Leisure

- 16.10 Our review of the Council's existing commercial leisure offer has been informed by the results of the household survey, the health check assessment and wider stakeholder engagement. In summary the evidence shows that there is a relatively good provision and choice of commercial leisure facilities in the Council area and its main centres.
- 16.11 The quantitative need assessment identified no additional capacity for new cinema screens over the forecast period, to 2031. If market demand from operators should arise over the plan period, this should be directed to CMK and other main centres first in accordance with the NPPF and local plan objectives to help complement and strengthen the existing cinema offer and choice.
- 16.12 There is a potential floorspace capacity for food and drink of 4,053 sqm gross by 2031. However, the prospect for new facilities will ultimately be determined by the level of market demand and interest for representation in the area and its main centres. Again, where market demand from operators does exist this should be directed to CMK and other main centres in the first instance in accordance with national and local plan objectives.
- 16.13 The evidence shows that there is also a strong provision of health and fitness facilities across the core Council area. There is potential through population growth to support approximately 3 or 4 additional gyms/ health club facilities over the forecast period, although this will also be dependent on the level of market demand and interest from operators.
- 16.14 In terms of addressing future needs, the Council area could possibly benefit from a slightly wider choice of family entertainment venues and activities.

Hierarchy Recommendations

- 16.15 Based on the findings of the household survey, centre health checks and quantitative need assessment, we have undertaken a high level review of the retail hierarchy. In the first instance, and in order to achieve consistency with the NPPF, we would recommend that the Council reviews the centre hierarchy as set out in Policy CS4, and reclassifies the status of the centres in the following manner:
- 1) **City Centre** - Central Milton Keynes (CMK)
 - 2) **Town Centres** - Bletchley, Wolverton, Kingston and Westcroft
 - 3) **District Centres** - Newport Pagnell, Olney, Stony Stratford and Woburn Sands
 - 4) **Local Centres** - We recommend that the Council, as part of the emerging Plan: MK, clearly defines the Local Centres in line with paragraph 23 of the NPPF (i.e. *"define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations"*). It may be the case that Council may wish to undertake a separate study to identify such centres and review their health.
- 16.16 As part of reviewing the retail and town centre hierarchy, we have also necessarily examined the role and function of existing out-of-centre retail and leisure locations in the local authority area. It is clear that these existing out-of-centre facilities do not have the range or choice of retail, leisure and other uses normally associated with city, town, local and District Centres. We therefore advise the Council that these out-of-centre shopping and leisure destinations should not be classified as 'town centres' in the emerging development plan, and should not be afforded any policy protection. This is because the main thrust of national and local plan policy is to direct new retail, leisure and wider town centre uses and investment to town centres first, ahead of edge and out of centre locations. If some or all of the existing out-of-centre facilities were designated as 'centres'

in this case it would, in our judgement, have a significant adverse impact on the delivery of existing, planned and committed investment in the main centres, as well as any future proposals for new public and private sector development. Therefore any proposals for new retail, commercial leisure and town centre uses in out-of-centre locations should necessarily be assessed against the key sequential and impact tests set out in the NPPF under paragraphs 24-27.

Recommendations on Frontages

16.17 We have also reviewed the adopted and emerging frontage policies. We advise that that they currently do not fully reflect the NPPF. We would thus recommend that the Council review the Proposals Map to ensure that it reflects the above and the following four elements prescribed by the NPPF:

- Town Centre Boundary (TCB);
- Primary Shopping Frontages (PSFs);
- Secondary Shopping Frontages (SSFs); and
- Primary Shopping Areas (PSAs).

16.18 We recommend that the Council formulates policies that respond to and reflect these designations, and which incorporate the trends outlined above. The Council may wish to create overarching policies for the four elements, or set out such policies on centre-by-centre basis. We must highlight at this stage that frontage policies should be treated differently from site-specific policies.

16.19 To assist the Council in the plan-making we provide below a high level review of the Main Centres (as detailed in our health checks), and our initial recommendations on potential changes to the current Proposals Map Boundary.

Recommendations for the Key Centres

Central Milton Keynes (CMK)

16.20 The evidence confirms that CMK is a vital and viable centre, although it would benefit from new investment and development to help maintain its market share and current role and function in the wider regional network and hierarchy of centres.

16.21 It has a good range of shopping and leisure facilities typically found in a centre of its size and position in the retail hierarchy. The vacancy level is low and there are no significant concentrations of vacant units. There is evidence of a relatively strong and growing market demand from retail and leisure operators for representation in the town centre, and it is performing well against a number of key performance indications (KPIs); including reported Prime Zone A Rents.

16.22 There are also a number of key developments in the pipeline (including The Point, the Intu extension, Theatre District refurbishment and Primark taking up the vacant BHS unit) that will further improve the centre's overall offer, attraction and the quality of the environment.

16.23 Notwithstanding this, CMK does have a number of shortcomings that we consider need to be addressed over the plan period. For example, we consider that opportunities should be explored to create an "independent" quarter within CMK; this could include moving the market into a permanent location, where rents and rates are more affordable.

- 16.24 The research has also highlighted that the centre would benefit from a stronger and more attractive evening and night time economy, as it is relatively quiet after shopping hours. Opportunities should therefore be explored to improve this, by not only introducing new and appropriate uses (such as bars, nightclubs, and music venues), but also by potentially increasing the population living in CMK.
- 16.25 The centre also lacks character and identity, and therefore promoting architectural diversity and creating high quality landmarks should be encouraged. There is also a need to create more attractive pedestrian links between the Railway station and PSA, and between the individual elements within the PSA. We advise that better links to Campbell Park should also be established, including the need for better signage and wayfinding.
- 16.26 In terms of accommodating the forecast need for new retail and commercial leisure uses over the plan period, the Food Centre is primarily vacant and presents a major redevelopment opportunity within the heart of the centre; with an approximate site area of 40,181 sqm. The redevelopment of this site could also be linked with the temporary car park located outside the Point. Its redevelopment could also seek to address some of the issues and deficiencies in the centre's overall offer as highlighted above. We advise the Council that it would be beneficial to prepare a Masterplan or planning and development brief that seeks to guide the complementary redevelopment of this area, and places it in the context of the wider town centre offer.
- 16.27 Turning to the current Proposals Map Boundary we set out our recommended changes based on the research evidence as follows:
- The **City Centre Boundary** for CMK should comprise the area bound by the following: the railway line, H6 Childs Way, Grand Union Canal and H5 Portway. We do not recommend that the Boundary should be expanded to include Rooksley and Winterhill retail parks: extending the boundary would potentially damage the significant existing, planned and proposed investment in the City Centre over the plan period, as these alternative locations would offer up alternative options for investment that would not benefit the vitality and viability of the primary shopping area.
 - The **Primary Shopping Area (PSA)** should be expanded to include the Xscape Entertainment Centre. In our judgement, Xscape forms an important element of the centre, and acts as a key attractor. Its offer complements and contributes well to the overall vitality and viability of the PSA, and provides an opportunity for linked trips and expenditure to other shops and businesses in the PSA and wider City Centre area.
 - The **Primary Shopping Frontages (PSF)**, should cover Centre: MK and The Intu Milton Keynes. The PSF can be further extended once the retail developments currently in the pipeline come forward and their impacts are more fully understood.
 - The **Secondary Shopping Frontages (SSF)** should cover the Milton Keynes Theatre District, and the Xscape Entertainment Centre. We advise that the definition of further secondary frontages could come forward as part of future redevelopment of CMK's key sites, once their impact has been monitored and fully understood (see Section 6).
 - **Edge of Centre** – In our judgement there is no requirement in planning policy terms to specifically define an “edge of centre” boundary. This is because the NPPF itself defines “edge of centre” for retail purposes as: “...a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances”. As such The NPPF definition should apply and there is therefore no requirement for a locally-set boundary in our view.

Kingston

- 16.28 Kingston is a healthy and viable centre that serves its catchment population. It is performing well against many of the health check key performance indicators. It offers a good retail mix and service offer, with an above national average provision of comparison, retail and leisure services. There are no vacant units within the centre; the environmental quality is relatively good; and the parking is free.
- 16.29 We consider that the centre offers the opportunity to attract further leisure providers in order to create a more attractive and vibrant night time economy. Financial service provision within the centre could also be improved.
- 16.30 There is limited street furniture within the centre, and there is also a lack of green open space. Improvements in these areas could enhance the shopping environment and, as a result, attract a larger number of visitors to the area.
- 16.31 As the centre is surrounded by the road network, and we consider that pedestrian access could be enhanced through the introduction of another subway, as well as safe pedestrian crossings. The centre could also benefit from a reconfiguration of the car park in order to increase vehicular and pedestrian circulation; and this is likely to be addressed through the planned redevelopment of the Kingston Centre.
- 16.32 The Proposals Map only defines the extent of the centre (in blue). We would recommend that Primary Shopping Frontages (PSFs) and Secondary Shopping Frontages (SSFs), and Primary Shopping Areas (PSAs) are also defined as follows:
- The Centre boundary should include just the built up area of the centre, and exclude the green 'buffer' areas towards the edge of the centre.
 - The **Primary Shopping Area** should follow the Centre boundary, but exclude the Kingston Library, and the area to the south east of the centre which encompasses Kingston Gymnastics & Fitness Centre and Milton Keynes Table Tennis Centre.
 - **Primary Shopping Frontages** should be defined to include the main retail units extending from Tesco Extra to Mamas & Papas (including the indoor shopping precinct), as well as the newer retail block containing units such as Nandos, Prezzo and Smashburger.
 - Secondary Shopping Frontages should include the standalone units such as McDonald's, Starbucks Coffee, Carphone Warehouse, and Arnold Clark Rental.

Westcroft District Centre

- 16.33 Westcroft is a large retail park and primarily functions as a centre accommodating the weekly convenience and comparison shopping needs of its catchment population. We consider it to be a relatively healthy and viable centre and mainly fulfils a niche role in catering for budget shoppers and in serving its local catchment.
- 16.34 It appears to be performing well against many of the health check key performance indicators. The centre has a good convenience offer, and the comparison provision within the centre is adequate. There are currently no vacant units. Westcroft District Centre also hosts three vehicle and motor sales centres, which gives the centre an alternative role and function.
- 16.35 We consider that the environmental quality of the centre is adequate, but there is potential to improve the condition of street furniture. Such improvements would help to enhance the overall shopping environment. Additionally, the pedestrian access to the centre from the surrounding residential areas is somewhat limited and could be enhanced through the introduction of safer pedestrian crossings.

16.36 The Proposals Map only defines the extent of the centre (in blue), and as such we would recommend that Primary Shopping Frontages (PSFs) and Secondary Shopping Frontages (SSFs), and Primary Shopping Areas (PSAs) are also defined as follows:

- The **Primary Shopping Area** should broadly replicate the Centre Boundary, with the exclusion of the Morrison's Petrol Station and the two areas of open green space to the west of the centre, located off Wimborne Crescent.
- **Primary Shopping Frontages** should include the main retail units which extend from Morrison's to MK Community Shop, and from Central Barbers to B&M Bargains.
- **Secondary Shopping Frontages** should include units on the outside of Barnsdale Drive, including McDonalds, Pizza Hut, KFC, and the Nut and Squirrel. It is also recommended that the row of units which link Westcroft District Centre to Wimborne Crescent be designated as part of the SSF.

Bletchley

16.37 Bletchley appears to be performing relatively well and in accordance with its relative role and function in the network and hierarchy of centres. It predominantly meets the food shopping, service and wider needs of its immediate local catchment population. The town's comparison provision is mainly value-led. There is a low vacancy rate, and there are a limited number of retailers seeking representation in the centre (both are 'value' operators).

16.38 The Council has long-standing aspirations to regenerate Bletchley town centre as articulated in the Local Plan and Core Strategy. This is a priority that is driven by the delivery of new housing, facilities and environmental improvements. There are a number of regeneration interventions under way, including: (i) the reopening of East-West Rail services through Bletchley from 2023, which will improve Bletchley's accessibility; and (ii) the 'Fixing the Links' project aimed at improving the linkages between Bletchley railway station and the town centre, which has received funding from the Government.

16.39 The production of the Central Bletchley *Urban Design Framework Area* for the development of sites around Bletchley town centre, to include new shops, services and facilities to serve the population of proposed new residential areas identified in Plan: MK, is considered integral to Bletchley's future. We believe that this should focus particularly on the following:

- the redevelopment of the Brunel Centre as a gateway development as a priority for the centre, together with investing into the vacant former Coop building and the Agora shopping centre;
- public realm improvements, and measures to improve its character and sense of identity; capitalising on the visitors generated by Bletchley Park;
- exploring opportunities for better marketing; and
- bringing the market into further prosperity through more proactive management and marketing.

16.40 Based on the findings of the health check, our site visits and wider consultation we recommend that the Centre boundary, Primary Shopping Frontages (PSFs), Secondary Shopping Frontages (SSFs) and Primary Shopping Areas (PSA) are broadly defined as follows:

- The **Town Centre Boundary** should be revised to include the Leisure Centre. The Council should also consider contracting the centre boundary to exclude the area east of Lennox Road; albeit we would recommend that further research is undertaken to inform the exact extent of this. It is also considered that the centre boundary should be contracted to exclude areas north of South Terrace. We note that this would mean excluding Lidl, but as highlighted in the health check the store has a poor relationship with the rest of the centre.

- We would recommend that a detailed use survey is undertaken to define the extent of PSF and SSF, and in turn the PSA. We recommend that this exercise is undertaken as part of the Central Bletchley Urban Design Framework to better inform the future regeneration plans for Bletchley. However based on our observation from our site visit, it would appear that the PSA should encompass the light blue area shown on the adopted Proposal Map, but excluding the areas north of Cawkwell Way.
- The Primary Shopping Frontages (PSF) should include the area currently shown on the Proposal Map as “Primary Shopping Areas in Town Centres TC18”, as well as the Sainsbury’s unit.
- The remaining area within the recommended PSA should be classified as Secondary Shopping Frontages (SSF) in our judgement.

Wolverton

16.41 The evidence shows that Wolverton is a declining town centre. With a relatively high vacancy rate, the recent loss of key town centre uses (including the Co-op and Post Office) and lack of comparison provision, we consider that there is potential for the overall vitality and viability of Wolverton to decline further. Whilst Wolverton has a significantly strong convenience goods provision (including Asda and Tesco, and planning permission for Lidl), the centre lacks a comparison offer and the quality of its leisure provision is relatively poor.

16.42 In our judgement the centre would benefit from a comprehensive Masterplan to help inform and guide its regeneration in the future. The prime focus should be on redeveloping the Agora Centre to “*stitch together*” the centre’s facilities and increase dwell times, potentially by investing in the food, beverage and evening economy.

16.43 Our recommendations on potential changes to the current Proposals Map Boundary are as follows:

- The Wolverton Neighbourhood Plan does not set out a **Town Centre Boundary**, and on this basis we recommend that the Town Centre Boundary as defined within the Local Plan Proposals Map should be retained.
- At present, the Wolverton Neighbourhood Plan also does not define a **Primary Shopping Area (PSA)**. We therefore recommend that the PSA should broadly cover the area defined by the proposed PSFs and SSFs (see below).
- After reviewing the proposed **Primary Shopping Frontages** as set out in the Wolverton Neighbourhood Plan, we recommend that these should be maintained. This includes those units along the north side of Church Street and south side of Stratford Road, as well as the large retail units at Glyn Square and front of the Agora Centre.
- In line with the Wolverton Neighbourhood Plan, we also recommend that The Square is allocated as part of the **Secondary Shopping Frontage**, together with the rear of the Agora Centre. We also support the allocation of SSFs along Stratford Road, Radcliffe Street, Creed Street and the units to the rear of the large units at Glyn Square.

Newport Pagnell

16.44 Newport Pagnell is a relatively healthy and viable centre. It is performing well against many of the health check key performance indicators. It predominantly serves its local catchment, providing for immediate day-to-day needs in terms of goods and services.

16.45 Notwithstanding this, we consider that the centre could benefit from improving its comparison offer by increasing the diversity and quality of the non-food stores including, for example, promoting independent retailers. Introducing a weekly street market would also enhance the character of the centre. Attracting food and beverage operators, such as bars and restaurants, to the town could help to enhance the centre’s evening offer and encourage night-time activity. The creation of new open space to host community events should also be considered.

16.46 Our recommendations on potential changes to the current Proposals Map Boundary are as follows:

- The **Town Centre Boundary** should be revised to the east of the centre to include the St Peter and St Paul's Church. To the north only the units fronting onto High Street should be included, removing the residential units along the south side of Union Street. To the west it should be extended to include the proposed SSFs
- We recommend that the existing **Primary Shopping Frontage** definitions should be retained.
- We suggest that along St Johns terrace a **Secondary Shopping Frontage** (SSF) should be allocated between the corner of Church Street to Astons estate agency (no. 26) and the corner of Church Street and Giant Store/fitness centre (no. 21). Along the south side of the High Street a SSF is also recommended from no. 79 to no. 111. An additional SSF could be included to the southwest of the High Street, which is currently allocated as a *Town Centre Mixed Use area* on the Proposals Map. On the north side of the street this will include nos. 100-122 and along the south of the street this will include nos. 127 High Street-1 Station Road. A SSF should also be allocated along the southern side of the High Street to the east of the centre from no. 13-1.
- The **Primary Shopping Area** (PSA) should include the PSF, alongside the suggested SSFs along St John Street and High Street/Station Road to the west.

Olney

16.47 Olney Town Centre is a relatively vital and viable centre that caters for the day-to-day shopping and service needs of its catchment population. The centre's markets are highly regarded by the community and should be marketed and promoted further. The dominance of independent retailing gives the centre a distinctive character, and should be maintained. It also benefits from a pleasant environment.

16.48 The centre has a strong mix of service and retail offer. We consider that there is potential to improve the current leisure offer in the centre by attracting more food and beverage operators to promote and enhance the centre's evening economy, as well as increase the footfall during the day.

16.49 Whilst the convenience offer of the centre is generally good, we consider that subject to market demand Olney could benefit from a larger supermarket to help anchor the centre's offer and to help meet the 'bulk' shopping needs of the local population. However this will be dependent on operator demand for representation in the centre.

16.50 Our recommendations on potential changes to the current Proposals Map Boundary are as follows:

- The currently defined **Town Centre Boundary** should be retained.
- The existing **Primary Shopping Frontage** should also be retained, but extended to include no. 25-33 High Street.
- A **Secondary Shopping Frontage** should be defined along the north of the High Street, between nos. 2-Fountain Court.
- The **Primary Shopping Area** should be defined to include the Stanley Court development alongside the defined primary and secondary shopping frontages.

Stony Stratford

16.51 Stony Stratford is a relatively healthy and viable centre, with a strong a strong mix of services and retail, and high quality public realm. The centre is characterised by independent retailing, which complements the traditional nature of Stony Stratford. It appears to be performing well against many of the health check key performance indicators.

- 16.52 If there is market demand, the centre could benefit from attracting a larger supermarket to the town centre to help anchor its offer and generate linked trips to help underpin the centre's overall vitality and viability.
- 16.53 In our view there is also a potential to improve the centre's current leisure offer - attracting more food and beverage operators could help to enhance the centre's evening economy, as well as increase dwell times during the day. Pedestrian access along the High Street could be enhanced through the introduction of a pedestrian crossing.
- 16.54 Our recommendations on potential changes to the current Proposals Map Boundary are as follows:
- We consider that the **Town Centre Boundary** as set out in the Neighbourhood Plan is appropriate.
 - After reviewing the proposed Neighbourhood Plan, we note that there are no proposed PSFs or SSFs defined. We therefore suggest that a **Primary Shopping Frontage** is defined to include the High Street along both sides of the street from no. 1 to the Bull Hotel/No. 51 (east of the church).
 - In terms of **Secondary Shopping Frontages** (SSFs) we consider that the High Street running from the northwest of Church Street to Fagan's Court should be defined as secondary frontage, including the church and library on the east side of Church Street and nos. 12-2 along the west side of Church street.
 - Whilst the Neighbourhood Plan sets out that the **Primary Shopping Area** is to include only High Street frontages between the junctions with York Road and Cofferridge Close, Map 2 of the Neighbourhood Plan does not reflect this. Based on our assessment of the centre, we consider that the Neighbourhood Plan PSA definition be amended to include the area covered by the PSFs and SSFs, as set out above.

Woburn Sands

- 16.55 Woburn Sands is a relatively healthy and viable centre. It is performing well against many of the health check key performance criteria. It has a relatively good provision of retail and services, and predominantly meets the day-to-day needs of its local catchment population.
- 16.56 We advise that the centre's independent offer be maintained and enhanced over the plan period. This will involve improving the quality of provision and building on its niche shops and services. The Market should be managed and marketed proactively to enable it to grow and flourish, and potentially to increase its regularity. Parking provision could also be improved in our view.
- 16.57 Our recommendations on potential changes to the current Proposals Map Boundary are as follows:
- The definition of the **Town Centre boundary**, as set out in the *Woburn Sands Neighbourhood Plan* Map September 2014, is broadly appropriate; albeit we recommend that it is extended to include the Zonin café/restaurant (1 Hardwick Road).
 - We recommend that the **Primary Shopping Area** should comprise the entirety of the High Street (within the centre boundary). We consider the *TC18 Primary Shopping Areas* in the Town Centre, shown on the Proposals Map, is broadly consistent with the NPPF definition of PSF; albeit it should be extended southwards to include the Tesco Express units.
 - The Secondary Shopping Frontage should comprise the rest of the frontages in the PSA that are not covered by the recommended PSF.

Local Impact Threshold: Recommendations

- 16.58 We have also assessed whether there is a requirement for the local planning authority to set a local (floorspace-based) impact threshold, rather than use the default of 2,500 sqm gross identified by the NPPF (paragraph 26).

This is important as it will determine whether applicants should carry out an impact assessment for new retail, leisure and office development outside of town centres that are not in accordance with an up-to-date Local Plan.

- 16.59 In summary the Planning Practice Guidance (PPG) published in March 2014 provides advice in setting a locally appropriate threshold and states that it will be important to consider the:
- scale of proposals relative to town centres;
 - the existing viability and vitality of town centres;
 - cumulative effects of recent developments;
 - whether local town centres are vulnerable;
 - likely effects of development on any town centre strategy; and
 - impact on any other planned investment.
- 16.60 While the quantitative and qualitative research evidence indicates that the majority of centres appear to be vital and viable, they are nevertheless vulnerable to increased competition from out-of-centre retailing and the growth of internet shopping.
- 16.61 Our assessment of retail trends in **Section 3** has highlighted the dynamic growth in smaller convenience stores operated by the major grocers (i.e. Sainsbury's Local, Tesco Express, Little Waitrose, etc.). Although sizes vary from location-to-location, the main grocers are generally seeking new convenience stores (e.g. Tesco Express, Sainsbury's Local, Little Waitrose) with a minimum gross floorspace of circa 370 sqm gross. In circumstances where these smaller stores are proposed on the edge or outside of smaller local and village centres, often as part of petrol filling stations, they could result in a significant adverse impact on their trading performance, and overall vitality and viability. This will particularly be the case where smaller centres and villages are dependent on smaller supermarkets and convenience ('top-up') stores to anchor their retail offer and generate footfall and linked trips/expenditure to the benefit of other shops, services and facilities.
- 16.62 In addition, modern retailers selling a range of comparison goods (including fashion, homestore and 'bulky' goods retailers) generally have requirements for larger format shop units with a minimum floorspace of approximately 465 sqm gross. This scale of floorspace provides operators with the necessary minimum 'critical mass' of sales needed to display their full range of goods in-store and attract customers from a wider catchment area, particularly where they are co-located alongside similar stores in town centre and out-of-centre locations. In general terms larger format non-food stores of over 465 sqm gross are also unlikely to trade as a purely local facility.
- 16.63 We therefore conclude in this case that it is reasonable for applicants proposing developments for new comparison and convenience goods retailing of 350 sqm gross and above to demonstrate that they will not have a significant adverse impact either on their own or cumulatively with other commitments in the area on any defined town, district or local centre within the Council area. In our judgement a 350 sqm threshold for Town, District and Local Centres is a reasonable impact threshold as it will provide the local planning authority with sufficient flexibility to assess the merits and implications of edge and out-of-centre foodstore applications that could potentially have significant implications for the viability and delivery of new or extended floorspace in these existing centres. We also advise that this threshold should be applied, where relevant, to change of use applications and applications seeking variations of conditions. A 350 sqm gross impact threshold is also reasonable based on our experience of advising other local planning authorities, and also drawing on the minimum impact thresholds identified in recently adopted local plans (including, for example, Rother District Council, Rotherham Metropolitan Council, Stafford Borough Council, Warrington Borough Council and Norwich City Council).

- 16.64 For Milton Keynes City Centre we consider that the threshold applied can be higher given the scale and range of its retail and leisure offer. Notwithstanding this, we would still advise the City Council to err on the side of caution and set a level below the default NPPF threshold of 2,500 sqm. Based upon our review of the current commitments proposed for the City Centre, and the average size and mix of units proposed, we consider that a threshold of 900 sqm gross would be reasonable in this case. This should be applied to all future edge and out of centre applications for standalone retail/leisure units and/or retail/leisure parks that the City Council consider could impact on the City Centre's overall vitality and viability.
- 16.65 Notwithstanding the above, it is important that the scope of any *Retail Impact Assessment* (RIA) in support of planning applications is discussed and agreed between the applicants and the Council at an early stage in the pre-application process. The level of detail included within a RIA should be proportionate to the scale and type of retail floorspace proposed, and should be agreed between the Council and applicant on a case-by-case basis. In all cases the local planning authority should adopt a pragmatic and reasonable approach with regard to the scope and detail of evidence required in support of planning applications.

17 GLOSSARY

TOWN CENTRES:	Town are the principal centre or centres in a local authority's area. In planning the future of town centres, local planning authorities should consider the function of different parts of the centre and how these contribute to its overall vitality and viability.
DISTRICT CENTRES:	District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library. These centres generally contain between 10,000-50,000sqm of retail, leisure and service floorspace; and provide a higher proportion of convenience over comparison goods.
LOCAL CENTRES:	Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office, a pharmacy or a launderette.
TOWN CENTRE USES:	As defined in the NPPF, main town centre uses are retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, cultural and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
TOWN CENTRE BOUNDARY:	Defined area, including the primary shopping area and areas of predominantly leisure, business and other main town centre uses within or adjacent to the primary shopping area. The extent of the town centre should be defined in Local Plans and on the policies map.
PRIMARY SHOPPING AREA (PSA)	Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).
PRIMARY & SECONDARY FRONTAGES	Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses, such as restaurants, cinemas and businesses.
EDGE-OF-CENTRE	As defined in the NPPF, For retail purposes a location that is well connected up to 300 metres from the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge-of-centre, account should be taken of local circumstances.
OUT-OF-CENTRE	A location which is not in or on the edge of a town centre. Out-of-centre locations are at the bottom of the retail hierarchy and any application for retail development in an out-of-centre location must fully assess impacts and rule out potential for locating in a more sequentially preferable location.
CONVENIENCE SHOPPING	Convenience retailing is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery.
COMPARISON SHOPPING	Comparison retailing is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.
SUPERMARKETS	Self-service stores selling mainly food, with a trading floorspace less than 2,500 square metres, often with car parking.
SUPERSTORES	Self-service stores selling mainly food, or food and non-food goods, usually with more than 2,500 square metres trading floorspace, with supporting car parking.
RETAIL WAREHOUSES	Large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods, catering mainly for car-borne customers.
RETAIL PARKS	An agglomeration of at least 3 retail warehouses
WAREHOUSE CLUBS	Large businesses specialising in volume sales of reduced priced goods. The operator may limit access to businesses, organisations or classes of individual.
FACTORY OUTLET CENTRES	Groups of shops specialising in selling seconds and end-of-line goods at discounted prices.
LEISURE PARKS	Leisure parks often feature a mix of leisure facilities, such as a multi-screen cinema, indoor bowling centres, night club, restaurants, bars and fast-food outlets, with car parking.
CONVENIENCE GOODS EXPENDITURE	Expenditure (including VAT as applicable) on goods in COICOP categories: Food and non-alcoholic beverages, Tobacco, Alcoholic beverages (off-trade), Newspapers and periodicals, Non-durable household goods.
COMPARISON GOODS EXPENDITURE	Expenditure (including VAT as applicable) on goods in COICOP Categories: Clothing materials & garments, Shoes & other footwear, Materials for maintenance & repair of dwellings, Furniture & furnishings; carpets & other floor coverings, Household textiles, Major household appliances, whether electric or not, Small electric household appliances, Tools & miscellaneous accessories, Glassware, tableware & household utensils, Medical goods & other pharmaceutical products, Therapeutic appliances & equipment,

	Bicycles, Recording media, Games, toys & hobbies; sport & camping equipment; musical instruments, Gardens, plants & flowers, Pets & related products, Books & stationery, Audio-visual, photographic and information processing equipment, Appliances for personal care, Jewellery, watches & clocks, Other personal effects.
SPECIAL FORMS OF TRADING	All retail sales not in shops and stores; including sales via the internet, mail order, TV shopping, party plan, vending machines, door-to-door and temporary open market stalls.
GROSS GROUND FLOOR FOOTPRINT FLOORSPACE	The area shown on the Ordnance Survey map or other plans as being occupied by buildings and covered areas measured externally.
GROSS RETAIL FLOORSPACE	The total built floor area measured externally which is occupied exclusively by a retailer or retailers; excluding open areas used for the storage, display or sale of goods.
NET RETAIL SALES AREA	The sales area within a building (i.e. all internal areas accessible to the customer), but excluding checkouts, lobbies, concessions, restaurants, customer toilets and walkways behind the checkouts.
RETAIL SALES DENSITY	Convenience goods, comparison goods or all goods retail sales (stated as including or excluding VAT) for a specified year on the price basis indicated, divided by the net retail sales area generating those sales.
QUANTITATIVE NEED	Is conventionally measured as expenditure capacity (i.e. the balance between the turnover capacity of existing facilities and available expenditure in any given area). Expenditure capacity, or 'quantitative need' can arise as a result of forecast expenditure growth (either through population growth or increase in spending), or by identification of an imbalance between the existing facilities and current level of expenditure available in an area.
QUALITATIVE NEED	Includes more subjective measures such as, for example, consumer choice; the appropriate distribution of facilities; and the needs of those living in deprived areas. 'Over trading' is also identified as a measure of qualitative need, although evidence of significant over-crowding, etc., may also be an indicator of quantitative need.
OVERTRADING	The extent to which the turnover of existing stores significantly exceeds benchmark turnovers may be a qualitative indicator of need, and in some cases inform quantitative need considerations. For example it may be an expression of the poor range of existing facilities or limited choice of stores and a lack of new floorspace within a locality. In certain cases 'overtrading' occurs when there is an imbalance between demand (i.e. available spend) and supply (i.e. existing floorspace capacity).
BENCHMARK TURNOVER	In the case of specific types of provision (such as foodstores) company average turnover figures are widely available and can provide an indication of a 'benchmark' turnover for existing facilities. However, turnover benchmarks should not be used prescriptively or in isolation to indicate a measure of 'need'. It is important to recognise that a range of factors (such as rental levels and other operating costs) mean that operators are likely to trade at a wide range of turnover levels. Given the inherent margins of error involved in this type of exercise, the use of company averages as benchmarks should be treated with caution unless they are corroborated by other independent evidence of under-performance, or strong trading. Examples might include the results of in-centre health checks, or the extent of congestion in stores and queuing at checkouts.

Appendix 1: STUDY AREA

Appendix 2: HEALTH CHECK SUMMARY CMK

Appendix 3: HEALTH CHECK SUMMARY – KINGSTON

Appendix 4: HEALTH CHECK SUMMARY – WESTCROFT

Appendix 5: HEALTH CHECK SUMMARY – BLETCHLEY

Appendix 6: HEALTH CHECK SUMMARY – WOLVERTON

Appendix 7: HEALTH CHECK SUMMARY – NEWPORT PAGNELL

Appendix 8: HEALTH CHECK SUMMARY – OLNEY

Appendix 9: HEALTH CHECK SUMMARY – STONY STRATFORD

Appendix 10: HEALTH CHECK SUMMARY – WOBURN SANDS

Appendix 11: POPULATION AND EXPENDITURE (CONVENIENCE AND COMPARISON GOODS)

**Appendix 12: POPULATION AND EXPENDITURE (COMPARISON AND
COMPARISON GOODS)**

Appendix 13: CONVENIENCE GOODS MARKET SHARES

Appendix 14: COMPARISON GOODS MARKET SHARES

Appendix 15: FORECAST CONVENIENCE GOODS TURNOVER

Appendix 16: FORECAST COMPARISON GOODS TURNOVER

Appendix 17: CONVENIENCE GOODS CAPACITY ASSESSMENT

Appendix 18: COMPARISON GOODS CAPACITY ASSESSMENT

Appendix 19: NEMS HOUSEHOLD SURVEY RESULTS