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St Edmundsbury Retail Appraisal

January 2012

St Edmundsbury
BOROUGH COUNCIL

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1 Summary

1.1 This report has been prepared five years from the date of the Donaldsons Bury St Edmunds and Haverhill Retail and Leisure Study 2007. It therefore enables changes that have occurred over the last five years to be identified. It is important to appreciate, however, that the 2007 Study was prepared at the end of a period of economic prosperity and that since 2008 economic circumstances have significantly changed. There continues to be economic uncertainty and forecasts of economic growth over the next five years have been downgraded substantially.

1.2 The Study has been undertaken having regard to the guidance in Planning Policy Statement 4: Planning for Sustainable Economic Growth (PPS4). It has been prepared to inform the content of the Local Development Framework, which is planning for the period up to 2031.

Bury St Edmunds

1.3 Major new shopping facilities have been implemented in Bury St Edmunds in the last five years, both within and outside the town centre.

Convenience Goods Potential

1.4 A third large foodstore, Asda at Western Way, was opened in March 2009 with a gross floorspace of 6,456 sq m trading in a wide range of non-food as well as food products. Another more recent smaller addition to the town's foodstore offer has been a Tesco Express on St Andrews Street South in the town centre. With three large foodstores outside the town centre, and Waitrose on the edge of the town centre, the town is now well provided with large foodstore facilities, and there is unlikely to be any demonstrable need for further facilities of this type before 2021.

1.5 Although, as a result of implementation of the Asda store, there is no overall quantitative need for new convenience floorspace in the town at the present time, there is scope to widen the foodstore offer in qualitative terms. The Core Strategy comments on the lack of a discount foodstore in the town. This remains the case, although the Tayfen Masterplan makes provision for such a facility. We support this allocation, although we recognise that there may be limited planning control over the type of trading which actually occurs.

1.6 One of the main generators of a need for new convenience facilities will be residents of the new expansion areas, to which Policy CS11 of the Core Strategy refers. We have identified the minimum levels of retail floorspace that will be required in order for residents to have access locally to appropriate levels of retail and community facilities and the achievement of sustainable forms of development. It may be that for some expansion areas, there are existing local centres sufficiently close by to provide for some of these needs, and that the vitality and viability of the centres would be enhanced through having a wider catchment from which to draw.

Comparison Goods Potential

1.7 Implementation of the Arc shopping centre on the site of the former Cattle Market has had a major positive effect on the shopping role and performance of Bury St Edmunds town centre. Both the household and street interview surveys provide evidence of this.

1.8 Comparison of the 2006 and 2011 household surveys shows the increased attractiveness of the town centre for key ranges of goods, in particular clothing and footwear. The street interview surveys show an increased proportion of shoppers whose principal reason for visiting the town centre was for shopping purposes.

1.9 Implementation of the Arc has satisfied town centre comparison goods shopping floorspace needs for the first part of the plan period, particularly in making provision for retailers requiring larger units. We believe that the strategy for the first part of the plan period should be one of consolidation of the town centre, and that any emerging potential for new floorspace should be steered towards the existing centre as a first priority. However, space requirements for 'high street' retailers are subject of considerable change and uncertainty at the present time.

1.10 In addition to the multiple retail warehouse provision in the Moreton Hall area, there are a considerable number of large freestanding independent facilities in industrial warehousing locations throughout the town, mostly trading in household goods / DIY/ garden products / and pet products. In our opinion the commitment for additional retail warehousing at Tayfen Road should provide for most additional needs in the early part of the plan period, and any further proposals should be judged having regard to sequential approach and impact requirements.

Quantitative Floorspace Capacity

1.11 Table 1.1 shows Bury St Edmunds theoretical floorspace capacity for convenience and comparison goods treating 2011 as being an equilibrium position, i.e. there was no clear evidence of a latent need for new floorspace at the time of the surveys.

Table 1.1 Bury St Edmunds Gross Floorspace Capacity (Equilibrium at 2011)

	2011	2016	2021	2026	2031
Town Convenience					
Quality Store equivalent	0	-16 sqm	+679 sqm	+1,472 sqm	+2,304 sqm
Local Shops equivalent	0	-40 sqm	+1,668 sqm	+3,618 sqm	+5,662 sqm
Town Centre Comparison					
	0	+4,159 sqm	+11,620 sqm	+19,533 sqm	+27,782 sqm
Non Central Comparison					
	0	-933 sqm	+3,923 sqm	+9,113 sqm	+14,544 sqm

Town Centre Issues

1.12 Bury St Edmunds benefits from having an attractive and relatively compact town centre. Implementation of the Arc with its associated car parking on the western edge of the town centre has retained the compact structure of the town centre, although the linkages between the Arc and the historic core of the centre would benefit from improvements.

1.13 We have identified primary shopping frontages that are focussed on Cornhill and the Buttermarket, but also include the new frontages in the Arc. The gap between the two primary frontage areas is evident, through which pedestrian flows need to be encouraged.

1.14 We believe that both St John's Street and the historic area focussed on Abbeygate Street and Hatter Street fulfil an important role within the town centre; the former as a location for small unit independent and specialist traders, and the latter providing for a wider range of retail and service facilities within historic premises (e.g. restaurants and bars).

1.15 The environment of the town centre is generally good, although consideration could be given to further vehicular traffic control measures in the Cornhill/Butter Market area. Care would be needed in creating an appropriate balance between an improved shopper environment and maintaining good access into the town centre for shoppers.

1.16 We have identified a primary shopping area that includes substantial areas to the west of the historic core of the town centre – predominantly the Arc and car parking, and the retail area focussed on Waitrose. In the longer term, some of the car parking areas could be reconfigured to provide for a further expansion of town centre retailing. However, any such development should be for 'high street' type retailing that would benefit the town centre most, for which there is unlikely to be a significant demand, certainly in the first part of the plan period.

Haverhill

1.17 A key issue in Haverhill is the relatively high outflow of expenditure from residents, most especially to Cambridge for comparison goods purchases.

1.18 A major new convenience shopping facility has been implemented in the form of a Tesco store of the edge of the primary shopping area, which opened in September 2009. In addition to this a refurbished and extended Aldi store was opened in Summer 2009.

Convenience Goods Potential

1.19 Opening of the new Tesco store, although of benefit to the town and its residents, was predicted to have a significant impact on existing convenience facilities. The principal casualty has been closure of the Co-Op store in the town centre. The household surveys also indicate the turnover of Sainsbury's store has been materially affected.

1.20 Overall, however, the town has benefited from an improved convenience goods offer, which has been reflected in an increase in the expenditure retention rate from its catchment.

1.21 An expenditure capacity justification for new convenience goods floorspace provision is unlikely before 2021, other than as part of any local provision to serve new housing that comes on stream by that date as a part of the expansion area proposals to which Policy CS12 of the Core Strategy applies.

Comparison Goods Potential

1.22 The town has a low retention rate for comparison goods, some 42% overall from the Primary Catchment Area (PCA), although this is masked by differential performances between comparison good sectors.

1.23 Taking 2011 as an equilibrium position, expenditure growth would indicate a need for some additional floorspace. However, our qualitative surveys of Haverhill indicate that the key need in Haverhill is to put existing town centre floorspace to more productive use, and only introduce new floorspace to the town if it would assist in meeting this objective or benefit the town centre as a whole.

1.24 It is also important to note that small changes in the market share of expenditure attracted to the town would have a major impact on the theoretical potential for new floorspace provision. The apparent lack of potential and poor performance of Haverhill as a centre for comparison goods shopping is caused by its low market share of retained expenditure. Development that would assist in increasing the attractiveness of Haverhill (increasing its market share of expenditure drawn from the catchment area) should therefore be welcomed, provided that it would not have a material adverse impact on the town centre.

Quantitative Floorspace Capacity

1.25 Table 1.2 shows Haverhill theoretical floorspace capacity for convenience and comparison goods treating 2011 as being an equilibrium position, i.e. there was no clear evidence of a latent need for new floorspace at the time of the surveys.

Table 1.2 Haverhill Gross Floorspace Capacity (Equilibrium at 2011)

	2011	2016	2021	2026	2031
Town Convenience					
Quality Store equivalent	0	123 sq m	459 sq m	846 sq m	1,254 sq m
Local Shops equivalent	0	302 sq m	1,129 sq m	2,078 sq m	3,081 sq m
Town Comparison					
	0	-1,733 sq m	700 sq m	3,305 sq m	6,032 sq m

Town Centre Issues

1.26 A major feature of Haverhill town centre is extensive new recent investment on the eastern side of Ehringhausen Way, which includes the new Tesco foodstore, Aldi foodstore, Cineworld, Leisure Centre, and restaurants, which has had a major positive impact on the offer of Haverhill town centre.

1.27 Unfortunately Ehringhausen Way is heavily trafficked and therefore is somewhat of a deterrent to pedestrian movement from the new facilities to the town centre core area along Queen Street / Market Hill / High Street. This is particularly evident in the north of the town centre where the difference in levels between Queen Street and the new Tesco foodstore is most pronounced.

1.28 Because of the barrier effect of Ehringhausen Way, we believe that the commercial area to the east of Ehringhausen Way should be treated as being ‘edge-of-centre’ and not part of the primary shopping area.

1.29 The primary shopping area of Haverhill is linear in nature. We have defined a recommended primary shopping area for Haverhill which basically includes the established shopping area extending from Queen Street in the north to the High Street / Duddery Road junction in the south. Within this area we have defined a primary shopping frontage running from the Queen Street / Camps Road junction to the High Street /Jubilee Walk junction.

1.30 The strategy should be to strengthen the primary shopping frontage. Although vacant premises are not particularly evident, other than in Jubilee Walk, there is clearly potential for this area to absorb greater shopping activity. The positive actions that the Council can take to achieve this are limited, however, as future investment will be largely dependent upon the market. The traffic calming measures that have been undertaken in High Street have provided a reasonably safe and attractive shopping environment in this area. Any further traffic control measures in the centre would need to be judged against the need to retain a feeling of activity in the centre. The fully pedestrianised Queen Street is noticeably quiet.

1.31 The major need in Haverhill is to spread the benefits of the major new development on the eastern edge of the town centre into the primary shopping area. Loss of the Co-Op store from retail use is unfortunate, because the premises lie in a strategic position between the new commercial areas in the east and the primary shopping area.

1.32 The former Co-Op premises / Jubilee Walk car parks / bus station should be the priority area within which to encourage new investment and development that would assist the vitality and viability of the core shopping area. We understand the Council is the freehold owner of land in this area and therefore should have the opportunity to bring this about. The attraction of appropriate forms of new retail investment to this area could have a major positive impact on the town centre.

1.33 Reuse of the Chauntry Mills site might also in part include some retail uses that would be beneficial, because of the proximity to the High Street / Market Hill frontages.

Policy Recommendations

1.34 We believe that the key parts of Core Strategy Policy CS10 continue to be applicable to the circumstances in St Edmundsbury Borough and should remain, namely maintaining Bury St Edmunds and Haverhill as the focus for new retail, leisure cultural and office development within the Borough, taking into account the issues specified in the policy.

1.35 We do, however, question the value of the Policy containing quantitative forecasts of shopping need expressed as expenditure capacity. We believe that such forecasts stated as a matter of policy are potentially misleading because they are a broad brush guide only. They are based on a number of uncertain variables, some of which can have very significant impacts on the assessment outputs; and also there is a significant difference between the turnover performance of retailers according to operator and store location.

1.36 We believe that any quantitative floorspace thresholds included in the Core Strategy are best expressed in the supporting text to shopping policies, rather than in the Policy itself. Consistent with this, the key test that should be addressed by any proposals for new development in ‘non-central’ locations are:

- Sequential approach
- Impact – specifying the measures of impact that must be addressed

1.37 In respect of the impact test, PPS4 refers to a threshold floorspace size above which impact assessments are required. Having regard to the hierarchy of shopping centres within St Edmundsbury, we believe that a threshold floorspace size of 1,000 sq m gross throughout the Borough would be appropriate.

1.38 In addition to the generic shopping policies referred to above, we believe that (as in the Borough Local Plan) it would be appropriate to define primary shopping areas and primary shopping frontages within Bury St Edmunds and Haverhill town centres. We presume also that the Action Area Plans will include site allocations, where specific forms of development are considered appropriate.

2 Introduction

Terms of Reference

2.1 Deloitte LLP (trading as Drivers Jonas Deloitte (DJD)) was instructed by St Edmundsbury Borough Council in September in August 2011 to *"undertake an appraisal of the future demand for retail floorspace, both for food and non-food goods, in Bury St Edmunds and Haverhill, the two main shopping centres in St Edmundsbury to 2031 and provide advice on specific retail aspects in the two towns"*.

2.2 The Study has two principal purposes, which are:

(i) To inform the implementation of the adopted St Edmundsbury Core Strategy (2010) and the preparation of town-wide Area Action Plans for Bury St Edmunds and Haverhill, including the identification of potential sites for retail uses; and

(ii) To provide a robust framework for the future consideration of planning applications for new retail development in St Edmundsbury based on the criteria for assessing applications set out in PPS4 and the Core Strategy.

2.3 The Consultants' Brief identifies a number of related matters on which advice is sought. These include:

- Reviewing and making recommendations on the primary shopping areas currently defined in the Replacement St Edmundsbury Borough Local Plan, adopted in 2006:
- Identifying the scope for extending the primary shopping area and/or town centre, and identifying centres where change needs to be managed;
- Reviewing any outstanding allocations for retail development and identifying appropriate locations to meet any future floorspace requirements;
- Advising on the need for additional town centre leisure floorspace provision;
- Assessing the impact of the opening of the 'Arc' retail development in Bury St Edmunds;
- Advising on how appropriate investment can be attracted to Haverhill town centre to improve the retail offer, viability and vitality of the town centre;
- Providing a baseline of data that would enable local town centre health checks to be undertaken on a regular basis by the Council with minimal revenue implications.
- Advising on the need for additional out-of-centre retail development;

- § Making recommendations with regard to spatial planning policies for inclusion in the Area Action Plans.

2.4 This report covers all the matters on which advice is sought in the Consultants' Brief.

Approach

2.5 This report has been prepared five years from the date of the Donaldsons Bury St Edmunds and Haverhill Retail and Leisure Study 2007 (Retail Study 2007). It therefore enables changes that have occurred over the last five years to be identified. It is important to appreciate, however, that the 2007 Study was prepared at the end of a period of economic prosperity and that since 2008 economic circumstances have changed significantly. There continues to be economic uncertainty and forecasts of economic growth over the next five years have been downgraded significantly.

2.6 The performance of retail facilities is a direct response to disposable incomes which have been particularly affected by the current economic recession. The current performance of retailing within St Edmundsbury has to be seen in the context of national circumstances, as well as a response to local factors.

2.7 The content of the Report is as follows:

- § A summary of our findings is contained within Section 1;
- § Section 2 provides an introduction to the Study;
- § Sections 3-5 address the Study context – national retail planning guidance, development plan policy, and the sub-regional shopping hierarchy;
- § Section 6 describes shopper interview surveys undertaken, which are similar to those undertaken for the 2007 Retail Study;
- § Sections 7 and 8 contain audits for Bury St Edmunds and Haverhill town centres;
- § Section 9 contains our quantitative assessment of retail potential within the two town centres;
- § Section 10 contains information from the Leisure Uses Assessment;
- § Sections 11 and 12 describe our findings for Bury St Edmunds and Haverhill town centres; and
- § Section 13 contains policy recommendations.

3 National Retail Planning Guidance – Policy Context

3.1 The key national retail planning guidance providing the policy context for this Study is PPS4 Planning for Sustainable Economic Growth, which was published on 29 December 2009.

3.2 The government's publication in July 2011 of its 'Draft National Planning Policy Framework' (NPPF) has introduced significant potential changes to national planning guidance. We first describe current national planning policy guidance as set out in PPS4, and then comment on relevant parts of the Draft NPPF.

PPS4 – Planning for Sustainable Economic Growth

3.3 Paragraph 7 identifies the main uses to which the town centre policies in PPS4 apply:

(i) retail development

(ii) leisure, entertainment facilities, and 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)

(iii) arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)

The uses addressed in this Study fall within the above categories of town centre use.

Achieving Economic Growth and Sustainable Forms of Development

3.4 Paragraph 9 states that "The Government's overarching objective is sustainable economic growth". Paragraph 10 goes on to identify the Government's objectives to help achieve sustainable economic growth. These objectives include:

§ delivering more sustainable patterns of development, and reducing the need to travel, especially by car and respond to climate change;

§ Promoting the vitality and viability of town and other centres as important places for communities. To do this, the Government wants:

– *"new economic growth and development of main town centre uses to be focused in existing centres, with the aim offering a wide range of services to communities in an attractive and safe environment and* *remedying deficiencies in provision in areas with poor access to facilities*

– *competition between retailers and enhanced consumer choice through the provision of innovative and efficient shopping, leisure, tourism and local services in town centres, which allow genuine choice to meet the needs of the entire community (particularly socially excluded groups)."*

Need for Economic Development

3.5 Policy EC1 indicates the evidence that is required of local authorities to plan positively for economic development. At the local level this includes:

§ assessing the detailed need for land or floorspace for economic development, including for all main town centre uses over the plan period;

§ Assessing the existing and future supply of land available for economic development:

§ Assessing the capacity of existing centres to accommodate new town centre development

3.6 Policy EC1.4 makes the following requirement of local planning authorities when assessing the need for retail and leisure development:

(a) *"Take account of both the quantitative and qualitative need for additional floorspace for different types of retail and leisure developments.*

(b) *In deprived areas that lack access to a range of services and facilities, give additional weight to meeting these qualitative deficiencies. However, any benefits in respect of regeneration and employment should not be taken into account, although they may be material considerations in the site selection process*

(c) *When assessing quantitative need, have regard to relevant market information and economic data, including a realistic assessment of:*

(i) *existing and forecast population levels*

(ii) *forecast expenditure for specific classes of goods to be sold, within the broad categories of comparison and convenience goods and for main leisure sectors*

(iii) *forecast improvements in retail sales densit*y

(d) *When assessing qualitative need for retail and leisure uses:*

(i) *assess whether there is provision and distribution of shopping, leisure and local services, which allow genuine choice to meet the needs of the whole community, particularly those living in deprived areas, in light of the objective to promote the vitality and viability of town centres and the application of the sequential approach*

(ii) *take into account the degree to which shops may be overtrading and whether there is a need to increase competition and retail mix"*

3.7 We are satisfied that the assessments that have been carried out meet Policy EC1.4 requirements.

Plan Making Policies

3.8 Policies EC2 to EC8 describe the matters to which local authorities should have regard when plan making.

3.9 Policy EC3 sets out a wide range of matters relating to planning for centres, including:

- § defining a network and hierarchy of centres;
- § making choices about which centres will accommodate any identified need;
- § considering appropriate actions for centres in decline, including the scope for consolidating and strengthening these centres; or reclassifying centres at a lower level and allowing retail units to change to other uses;
- § defining the extent of centres, primary shopping areas, and distinguishing between primary and secondary frontages making clear which uses will be permitted in such locations;
- § setting floorspace thresholds for the scale of edge-of-centre and out-of-centre development that should be subject to an impact assessment under (EC16.1) and the geographic areas within which these thresholds will apply;
- § encouraging residential or office development above ground floor retail, leisure or other facilities within centres:
- § Identifying sites or buildings within existing centres suitable for development.

3.10 Policy EC4 promotes consumer choice and competitive town centres. Policy EC4.1 focuses on the actions required to promote consumer choice in town centres, including a diverse range of uses and strong retail mix, sites for large format developments, and fostering of markets. Policy EC4.2 describes actions for promoting complementary evening and night-time leisure uses.

3.11 Policy EC5 deals with site selection and land assembly for main town centre uses. The matters covered are carried forward into Policies EC10-EC17 that set out the specific policy tests that are to be applied to applications for planning permission. Policy EC5.1 requires local planning authorities to:

"identify an appropriate range of sites to accommodate the identified need, ensuring that sites are capable of accommodating a range of business models in terms of scale, format, car parking provision and scope for disaggregation. An apparent lack of sites of the right size and in the right location should not be a reason for local planning authorities to avoid planning to meet the identified need for development. Local planning authorities should:

(a) "base their approach on the identified need for development

(b) identify the appropriate scale of development, ensuring that the scale of the sites identified and the level of travel they generate, are in keeping with the role and function of the centre within the hierarchy of centres and the catchment served

(c) apply the sequential approach to site selection (see policy EC5.2)

(d) assess the impact of sites on existing centres (see policy EC5.4)

(e) *consider the degree to which other considerations such as any physical regeneration benefits of developing on previously-developed sites, employment opportunities, increased investment in an area or social inclusion, may be material to the choice of appropriate locations for development"*

3.12 In respect of the sequential approach Policy EC5.2 says:

"Sites for main town centre uses should be identified through a sequential approach to site selection. Under the sequential approach, local planning authorities should identify sites that are suitable, available and viable in the following order:

(a) *locations in appropriate existing centres where sites or buildings for conversion are, or are likely to become, available within the plan period*

(b) *edge-of-centre locations, with preference given to sites that are or will be well-connected to the centre*

(c) *out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are closest to the centre and have a higher likelihood of forming links with the centre*

3.13 EC5.3 requires that sites that best serve the needs of deprived areas should be given preference when considered against alternative sites with similar location characteristics.

3.14 In respect of impact Policy EC5.4 says:

"In assessing the impact of proposed locations for development under EC5.1.d, local planning authorities should:

(a) *take into account the impact considerations set out in Policy EC16, particularly for developments over 2,500 sqm or any locally set threshold under EC3.1.d, ensuring that any proposed edge of centre or out of centre sites would not have an unacceptable impact on centres within the catchment of the potential development*

(b) *ensure that proposed sites in a centre, which would substantially increase the attraction of that centre and could have an impact on other centres, are assessed for their impact on those other centres, and*

(c) *ensure that the level of detail of any assessment of impacts is proportionate to the scale, nature and detail of the proposed development*

3.15 Policy EC5.5 requires local planning authorities to allocate sufficient sites to meet at least the first five years identified need, and where appropriate set out policies for the phasing and release of allocated sites.

3.16 Policy EC6 deals with economic development in rural areas, referring to the identification of local service centres, and the need to remedy any identified deficiencies in local shopping and other facilities to serve people's day-to-day needs and help address social exclusion.

3.17 Policy EC7 requires local planning authorities to support sustainable rural tourism and leisure developments.

3.18 Policy EC9 identifies the need for monitoring by local planning authorities, with Policy EC9.1 referring to the need for Annual Monitoring Reports to keep under review:

(a) the network and hierarchy of centres

(b) the need for further development

(c) the vitality and viability of centres

3.19 Policy EC9.2 indicates the need to measure the vitality and viability and monitor the health of town centres over time to inform judgements about the impact of policies and development. Local authorities should also regularly collect market information and economic data on key indicators, preferably in conjunction with the private sector. We have provided a suggested pro-forma to assist the Council with future monitoring, which will enable them to build on the data collected as part of the Centre Audits undertaken within this Study.

Development Management Policies

3.20 Policies EC10 to EC19 provide guidance to local planning authorities on the matters to be addressed in dealing with planning applications for economic development, requiring them to adopt a positive and constructive approach.

3.21 Policies EC15 dealing with the sequential approach and EC16 dealing with impact draw on some of the Plan Making policies to which we have referred above, in particular Policy EC5.

Draft National Planning Policy Framework July 2011

3.22 The Government published its draft National Planning Policy Framework (NPPF) in July 2011. The NPPF is to become an all-embracing statement of national planning policy replacing existing PPSs and PPGs, including the relatively recent PPS4. Limited weight can be applied to a consultation document, but a recent note from PINS to Inspectors states:

"Whilst it is a consultation document and, therefore, subject to potential amendment, nevertheless it gives a clear indication of the Government's `direction of travel' in planning policy. Therefore, the draft National Planning Policy Framework is capable of being a material consideration, although the weight to be given to it will be a matter for the decision maker's planning judgment in each particular case. The current Planning Policy Statements, Guidance notes and Circulars remain in place until cancelled."

3.23 The NPPF indicates that a key stated purpose of the planning system is the achievement of sustainable development (paragraph 9). It goes on to describe sustainable development as having three threads

§ planning for prosperity (an economic role) – use of the planning system to build a strong, responsive and competitive economy:

§ Planning for people (a social role) – use of the planning system to promote strong, vibrant and healthy communities: and

§ planning for places (an environmental role) – use of the planning system to protect and enhance the natural, built and historic environment.

3.24 The emphasis placed on economic considerations is indicated in paragraph 13.

"The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. A positive planning system is essential because, without growth, a sustainable future cannot be achieved. …."

3.25 The importance attached to the achievement of sustainable development is re-emphasised in paragraphs 14 and 53 (Development Management):

"At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking."

"The primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent development."

3.26 Core land-use planning principles are set out in paragraph 19, the first one of which is:

"planning should be genuinely plan-led, with succinct Local Plans setting out a positive long-term vision for an area. These plans should be kept up to date and should provide a practical framework within which decisions on planning applications can be made with a high degree of certainty and efficiency"

3.27 Paragraphs 76-80 deal with promotion of the vitality and viability of town centres. Paragraph 76 requires that planning policies should be positive, promoting competitive town centre environments and setting out policies for the management and growth of centres over the plan period. It goes on to describe actions that local authorities should take including:

- Recognising town centres as the heart of communities and pursuing policies to support the viability and vitality of town centres
- Defining a network and hierarchy of centres that is resilient to anticipated future economic changes

3.28 The 'sequential approach' is retained in respect of retail and leisure uses only. Paragraphs 77-78 broadly summarise PPS4 requirements (although the word 'prefer' is used).

"Local planning authorities should apply a sequential approach to planning applications for retail and leisure uses that are not in an existing centre and are not in accordance with an up to date Local Plan.

Local planning authorities should prefer applications for retail and leisure uses to be located in town centres where practical, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. In applying this sequential approach, local planning authorities should ensure that potential sites are assessed for their availability, suitability and viability and for their ability to meet the full extent of assessed quantitative and qualitative needs."

3.29 Similar to PPS4 requirements, impact assessments are required for retail and leisure developments outside town centres and not in accordance with an up-to-date Local Plan, which are in excess of a locally defined floorspace threshold. If there is no locally set threshold, the default threshold is 2,500 sq m (paragraph 79).

3.30 Impact considerations for retail and leisure development should include:

- *“the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and*
- *the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to ten years from the time the application is made.”*

3.31 In our opinion the draft NPPF guidance that is of particular relevance to the to this Study is:

- The emphasis on achievement of sustainable development;
- The priority attached to economic growth;
- The key role of the development plan;
- The continued support for town centres and the definition of a network and hierarchy of centres; and
- Retention of the sequential approach and impact considerations in broadly the same form.

3.32 We are satisfied that the studies that we have undertaken provide a sound basis to inform implementation of the St Edmundsbury Core Strategy (2010) and to inform preparation of town-wide Area Action Plans (AAPs) for Bury St Edmunds and Haverhill. In addition we are satisfied that that it provides a robust framework for the future consideration of planning applications for new retail development in St Edmundsbury District.

4 Development Plan - Policy Context

4.1 This section of the report sets out the relevant Development Plan policy context.

East of England Plan, 2008

4.2 The RSS East of England Plan 2008 is a part of the statutory development plan. However, the Government indicated in July 2010 that, in common with other regional spatial strategies, the East of England Plan (May 2008) was to be cancelled. Court challenges have deferred the date of cancellation, which will be through introduction of the Localism Act. However, because many elements of the RSS are likely to continue to be pursued, we make reference here to Policies H1, E5 and SS6 of the Plan

4.3 Policy H1 of the Plan identifies the minimum provision of new housing that is required throughout the Region in the period 2001-2021. These requirements provide the basis for the Bury St Edmunds Core Strategy growth forecasts, to which we refer below.

4.4 Policy E5 identifies Bury St Edmunds as a Major Town Centre, within which major new retail development and complementary town centre uses should primarily be located. Policy SS6 indicates that vibrant and attractive town centres are fundamental to the sustainable development of the East of England and should continue to be the focus for investment, environmental enhancement and regeneration.

St Edmundsbury Core Strategy December 2010

4.5 The Core Strategy Development Plan Document (DPD) was adopted by the Council on 14 December 2010, and now forms part of the Local Development Framework (LDF) for St Edmundsbury. It sets out the vision, objectives, spatial strategy and overarching policies for the provision of new development in the Borough up to 2031.

Spatial Strategy

4.6 The spatial strategy for St Edmundsbury is set out in Section 3 of the document. This includes the following statements:

<u>Bury St Edmunds</u>

§ The town will respect its nationally important heritage to offer a town rich with employment and retail opportunities, green open spaces and historic and cultural assets.

§ The town will capitalise on its status as the sub-regional centre for West Suffolk and its position between Cambridge and Ipswich.

Haverhill

§ Regeneration of the town will continue with the aim of being able to have a more attractive retail, leisure and employment offer to its residents to decrease the amount of out-commuting and to grow an organic 21st Century town based on strong community.

Growth Strategy

4.7 The growth strategy for the District is described in **Policy CS1**, which provides for *"a commensurate proportion of the 18,000 new jobs allocated in the East of England Plan for the rest of Suffolk and the same Plan's requirement for at least 15,400 new homes (net) between 2001 and 2031"*. Of these new homes 8,118 are shown as being provided in Bury St Edmunds, 5,301 in Haverhill, with the remainder in the rural area.

4.8 The growth strategy for Bury St Edmunds is set out in **Policy CS11**, which requires that:

An AAP DPD will be prepared for Bury St Edmunds that will provide a coordinated spatial planning framework for the whole town, including the release of larger, strategic greenfield sites. Land will be released, in a phased manner, in the following locations:

(i) 2011 onwards - limited growth to the north-west that delivers around 900 homes;

(ii) 2011 onwards - limited growth completing the existing Moreton Hall urban extension that delivers around 500 homes;

(iii) Medium term - limited growth to the west that delivers around 450 homes;

(iv) Long term strategic growth - north-east Bury St Edmunds that delivers around 1,250 homes; and

(v) Long term strategic growth – south-east Bury St Edmunds that delivers around 1,250 homes;

4.9 The growth strategy for Haverhill is set out in **Policy CS12**, which requires that:

An AAP DPD to be prepared for Haverhill that will provide a coordinated spatial planning framework for the whole town including the release of larger, strategic, greenfield, sites.

Land north-west of Haverhill allocated in Policies HAV2 and HAV8 of the Replacement St Edmundsbury Borough Local Plan 2016 is confirmed by the Core Strategy, with the potential to deliver 1,150 new homes. The development will be undertaken in accordance with the masterplan that was approved by the Council in June 2009.

In addition, it will be necessary to release a larger, strategic greenfield site at Haverhill to deliver the development strategy of the Local Development Framework. Land on the north-eastern edge of Haverhill is identified that will deliver around 2,500 homes.

Retail Strategy

4.10 Strategic Objective E of the Core Strategy is:

"To provide opportunities for people to shop for all their needs by sustainable means in thriving and economically viable town, local and district centres."

4.11 **Policy CS10** makes more specific provision for Retail, Leisure, Cultural and Office Provision stating that:

"The town centres of Bury St Edmunds and Haverhill will continue to be the focus for new retail, leisure, cultural and office development, taking into account:

- *the need to maintain their vitality and viability;*
- *the requirement to assess and accommodate the need for future growth;*
- *the sequential approach to development;*
- *the impact of any development on existing centres; and*
- *the need to ensure locations are accessible by a variety of modes of transport"*

4.12 The Policy goes on to say:

"Retail and leisure activity elsewhere will be focused on those Key Service and Local Service Centres identified in Core Strategy Policy CS4 and in the new local centres located in the areas for growth identified in Policies CS11 and CS12. The development of services and facilities in these locations will be expected to be of an appropriate scale and character to reflect the role and function of the local centres and in accordance with the sequential approach."

4.13 The retail needs of Bury St Edmunds and Haverhill (including convenience and comparison goods floorspace forecasts contained within Policy CS10) were informed by the findings of the Donaldsons Bury St Edmunds and Haverhill Retail, Leisure and Offices Study, 2007 (2007 Retail Study). We refer to the findings of this Study throughout the report.

Replacement St Edmundsbury Borough Local Plan 2016

4.14 On 27 June 2006, St Edmundsbury Borough Council adopted the Replacement St Edmundsbury Borough Local Plan 2016. The adopted plan forms part of the development plan for the area of St Edmundsbury and forms the basis for decisions on land-use planning affecting the Borough area.

4.15 Since adoption of the LDF Core Strategy, the strategic policies of most relevance to this Study have been superseded by guidance and policies in the Core Strategy, including a policy related to defined Shopping Centres (replaced by Core Strategy policy CS10). However two policies of relevance in the Local Plan that have not been superseded are Policy TCR1 and TCR2, which define and offer protection to primary shopping areas within Bury St Edmunds and Haverhill.

4.16 Policy TCR2 requires that proposals within defined shopping areas should not:

- *“Undermine the vitality or shopping character of the street; or*
- *Detract from the appearance of the immediate environment, especially in Conservation Areas;*
- *Adversely affect the amenity of the surrounding area by virtue of noise, congestion on pavements or disturbance arising from late opening hours;*
- *Result in an over-concentration of non-retail uses in a Primary Shopping Area.”*

Bury St Edmunds and Haverhill Action Area Plans

4.17 Policies CS11 and CS12 of the Core Strategy refer to the preparation of AAP DPDs for both Bury St Edmunds and Haverhill that will provide a coordinated spatial planning framework for towns including the identification of development sites. This Study will provide part of the evidence base for the AAPs (also known as the Bury St Edmunds Vision 2031 and Haverhill Vision 2031).

5 Sub Regional Shopping Hierarchy

5.1 St Edmundsbury Borough Council administrative area is located in the heart of East Anglia. The closest major urban areas outside of the Borough are Cambridge and Ipswich, where there is substantial retail provision. In addition to this Norwich is another significant centre which, although more distant than Cambridge or Ipswich, has some influence on shopping patterns in the Borough.

5.2 In respect of other centres there are a number of neighbouring towns which provide notable levels of retail provision and therefore influence shopping patterns within the catchments of Bury St Edmunds and Haverhill. These centres include Newmarket, Sudbury, Stowmarket, Braintree, Saffron Waldon and Thetford.

5.3 In this Section we provide a summary description of the status, role and function of those centres that draw some shopping trips from the catchment areas of Bury St Edmunds and Haverhill, and which therefore provide a context for consideration of the role and potential of the two centres.

Competing Centres

Cambridge

5.4 Cambridge dominates an extensive catchment area and functions as a Regional Centre (as defined by the East of England Plan). The city is renowned for its university and is a popular tourist destination. Whilst predominantly rural, the catchment encompasses a large number of sizeable villages, as well as small towns such as Haverhill, Saffron Walden, Royston, Ely and Newmarket.

5.5 The estimated shopping population of Cambridge is 324,000 ranking it 27 of all of the PROMIS[1] centres. City Centre retail floorspace in Cambridge is estimated at 138,425 sq m (1.49 million sq ft). Cambridge has a strong level of high street multiple retailers and a number of anchoring department stores, namely Debenhams, John Lewis, Marks and Spencer's and Primark. These stores are contained within the three shopping centres, known as, Grand Arcade, Grafton Centre and Lion Yard Centre.

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[1] Property Market Analysis LLP (PMA) provide the UK Property Market Information Service (PROMIS). PROMIS publishes information on town and shopping centres throughout the country.

5.6 Out of centre retail is provided on two retail parks, the largest of which is Cambridge Retail Park (located to the north of the City Centre) which has a number of 'high street' retailers present as well as some bulky goods and A3 operators. In total it contains 21, 646 sq m (233,000 sq ft) of retail floorspace.

5.7 There are no notable schemes in the pipeline in terms of future retail provision.

Ipswich

5.8 Ipswich is the largest town within Suffolk and is classed as a Regional Centre (East of England Plan).

5.9 The estimated shopping population is 269,000 ranking it 37 of all of the PROMIS centres. Centre retail floorspace in Ipswich is estimated at 121,000 sq m (1.3 million sq ft). Ipswich has a number of high street multiple retailers present and a number of anchoring department stores, namely Debenhams, TJ Hughes, Marks and Spencer's and Primark. There are two shopping centres known as Buttermarket Shopping Centre and Tower Ramparts Shopping Centre.

5.10 The town has a higher than average proportion of retail warehousing on retail parks which accounts for 73% of the town's overall retail floorspace. There are six retail parks in total; Euro Retail Park, Anglia Retail Park and Interchange Retail Park which are located further from the town centre, and Suffolk Retail Park, Orwell Retail Park, Commercial Road / Chancery Road which are more centrally located. They are all of modest size containing between 5 and 10 units selling mainly bulky goods with some 'high street' retail.

5.11 There are two notable retail schemes in the pipeline. These include the addition of 15,236 sq m (164,000 sq ft) retail floorspace within the town centre, as well as The Link, which is proposing 4,181 sq m (45,000 sq ft) of retail floorspace alongside office uses and a hotel.

Norwich

5.12 Norwich dominates a predominantly rural catchment area and is defined as a Regional Centre (East of England Plan). The catchment includes the towns of Great Yarmouth and Lowestoft and borders the catchment of Bury St Edmunds to the south and Kings Lynn to the west.

5.13 The estimated shopping population of Norwich is 510,000 ranking it 9 of all of the PROMIS centres. City Centre retail floorspace in Norwich is estimated at 204,386 sq m (2.2 million sq. ft). Norwich has a strong level of high street multiple retailers and a number of anchoring department stores, namely Debenhams, John Lewis, and House of Fraser. These stores are contained within the two shopping centres of Chapelfield and Castle Mall.

5.14 56% of the City's retail floorspace is contained on retail parks, of which there are six. The largest is Sprowston Retail Park (15,608 sq m / 168,000 sq ft), which contains Homebase, Dunelm Mill, JJB Sports and Pets at Home. The second largest is Norfolk Retail Park (also know as Longwater Retail Park) (13,936 sq m / 150,000 sq ft) which contains Sainsbury's, Staples and Argos Extra. The other key retail parks include Riverside Retail Park (13,564 sq m / 146,000 sq ft); Sweet Briar Retail Park (9,383 sq m / 101,000 sq ft); Hall Road Retail Park (12,263 sq m / 132,000 sq ft); and Cathedral Retail Park (5,203 sq m / 56,000 sq ft).

5.15 There is one notable retail scheme in the pipeline. This is a proposal (at pre-application stage) for 9,290 sq. m (100,000 sq ft) of retail floorspace at the former Norwich Union site in Westlegate.

Newmarket

5.16 Newmarket is a market town within a rural catchment area. Both Cambridge and Bury St Edmunds are the two closest centres of significance.

5.17 The estimated shopping population is 26,000 and the town is expected to see above average growth in population over the next 10 years.

5.18 Centre retail floorspace in Newmarket is estimated at 35,303 sq m (380,000 sq ft). Newmarket has a limited number of high street multiple retailers, and one department store which is Marks and Spencer's. The main shopping centre is the Guineas Shopping Centre (The Rookery). There is also Studland Retail Park located out of centre. This is occupied predominantly by bulky goods retailers and totals 5,667 sq m (61,000 sq ft).

5.19 In terms of convenience provision there are three main foodstores which are Waitrose, Tesco and Iceland.

5.20 We are not aware of any major retail schemes in the pipeline but there are currently proposals for additional foodstores around the town.

Sudbury

5.21 Sudbury is a small market town situated approximately 20km south of Bury St Edmunds, 20km north of Colchester and 18km to the east of Haverhill. Its catchment is therefore predominantly rural and is influenced by the larger centres of Colchester, Ipswich and Bury St Edmunds.

5.22 The estimated shopping population of Sudbury is 24,000 and the town is expected to see a close to average growth in terms of population between 2010-2015.

5.23 Retail floorspace in Sudbury is estimated at 39,000 sq m (420,000 sq ft). The town has a number of high street multiple retailers present, including Dorothy Perkins, New Look, Fat Face and WH Smith. There is also one department store, Roys of Wroxham.

5.24 In terms of out of centre retail, there are two retail parks, one containing 9,197 sq m (99,000 sq ft) of floorspace, and the other providing 2,694 sq m (29,000 sq ft) of floorspace.

5.25 In terms of convenience provision there are four main foodstores which are Coop, Tesco, Farmfoods and Waitrose.

5.26 We are not aware of any major retail schemes in the pipeline.

Thetford

5.27 Thetford is a small town with a rural catchment area. It is located approximately 15km to the north of Bury St Edmunds and is distant from other main centres (both Cambridge and Norwich are over 30km away)

5.28 Thetford is a relatively small centre and there are few high street multiples present. There is one out of centre retail park, Forest Retail Park on London Road, which has a total floorspace of 10,963 sq m and is occupied by Curry's, Carpet Right, Allied Carpets and some food and drink units.

5.29 In terms of convenience provision there are three main foodstores which are Tesco, Farmfoods and Sainsbury's.

5.30 The town is planned to accommodate a significant amount of growth over the next 10 years with 6,000 new homes being built.

5.31 We are not aware of any major retail schemes in the pipeline.

Stowmarket

5.32 Stowmarket is a market town with a rural catchment and is situated approximately 20km east of Bury St Edmunds and 17km north of Ipswich.

5.33 Stowmarket has a population of approximately 16,000. There is limited representation by high street multiples. Shopping provision is therefore mainly independent in nature.

5.34 In terms of convenience provision there are three main foodstores which are ASDA, Coop and Tesco.

5.35 We are not aware of any major retail schemes in the pipeline.

Saffron Walden

5.36 Saffron Waldon is an historic market town with a rural catchment area. Cambridge is situated approximately 20km to the north and Haverhill 13km to the east.

5.37 There are limited high street multiples (namely WH Smith, Monsoon, New Look and Boots) within the centre, which is occupied mainly by independents. There are no out of centre retail parks.

5.38 In terms of convenience provision there are two main foodstores which are Tesco and Waitrose.

5.39 We are not aware of any major retail schemes in the pipeline.

Braintree

5.40 Braintree is a town that has a rural catchment area and is located approximately 20km west of Colchester and 26km south of Haverhill.

5.41 Within the centre the majority of retail provision is within George Yard Shopping Centre (10,870 sq m) and includes stores such as Boots, Burtons, Superdrug and Dorothy Perkins.

5.42 There are two out of centre facilities, which are Braintree Retail Park (17,551 sq m) which provides a B&Q, Comet and Carpet right; and the Freeport Braintree Outlet Village (28,859 sq m), where a range of factory outlet comparison units are present.

5.43 In terms of convenience provision there are two main foodstores which are Tesco and Sainsbury's.

5.44 We are not aware of any major retail schemes in the pipeline.

Summary

5.45 Bury St Edmunds, as the principal town centre within St Edmundsbury Borough, competes for Primary Catchment Area[2] (PCA) residents' expenditure principally with the two larger regional centres of Cambridge and Ipswich and to a lesser extent with Norwich. The town centre is larger and stronger than the smaller competing town centres on the edge of its PCA, which include Sudbury, Stowmarket, Thetford and Newmarket and has the potential to continue to draw expenditure from the catchment of these centres with improvements in its retail and leisure offer.

5.46 Haverhill is a smaller, less self-sufficient centre than Bury St Edmunds, with Cambridge being the main draw for residents expenditure alongside Bury St Edmunds, both of which are located approximately 25km away. Whilst Haverhill will never compete directly with these centres, the opportunity exists to improve the town's retention of expenditure from its primary catchment through an improved retail and leisure offer.

[2] See Paragraph 7.4 - Page 27

6 Household and Street Interview Surveys

Household and Street Interview Surveys

6.1 For the purposes of examining existing shopping patterns and usage of leisure facilities in the Bury St Edmunds and Haverhill catchment areas, we commissioned RMG Clarity to undertake household and street interview surveys covering both towns. In order to enable changes to be identified since the previous surveys were undertaken in July 2006 by Research and Marketing Plus (the previous name of RMG Clarity), the surveys were designed to be as comparable as possible. The details of the household survey findings are set out in Appendix 2 and the street survey results can be found in Appendix 3.

6.2 The household surveys adopted the same Study Area and zones as the 2006 surveys, which are based on post-code sectors. The Study Area is divided into 10 zones which reflects the catchments of Bury St Edmunds and Haverhill and competing towns. The Study Area zones include Thetford and Diss in the north, Stowmarket in the east, Sudbury in the south, and Newmarket in the west (the boundary in the west extending almost to Saffron Walden, Cambridge and Ely). A total of 1,070 interviews spread throughout the Study Area zones were undertaken in October 2011. A plan of the Study Area and zones is shown in Appendix 1.

6.3 Street interview surveys were undertaken within Bury St Edmunds and Haverhill town centres. Within Bury St Edmunds a total of 400 interviews were undertaken over a five day period between from 19 October to 8 November (Wednesday, Thursday, Friday Saturday, and Monday), between the hours of 10am to 4pm. There were eight survey locations in the town centre, three more than in the 2006 surveys including two within the Arc.

6.4 Within Haverhill a total of 200 interviews were undertaken over a five day period between 2 and 8 November (Wednesday, Thursday, Friday Saturday, and Tuesday) between the hours of 10am to 4pm. There were three locations in the town centre, similar to those used in the 2006 surveys.

6.5 We describe and make use of the interview survey findings in our quantitative and qualitative appraisals of Bury St Edmunds and Haverhill in the subsequent sections of the report. The household interview surveys identify existing shopping trip patterns within the Study Area, from which assessments of existing expenditure flows to shopping centres have been made. The street interview surveys provide information on the place of residence of interviewees, the purpose of their visit to the centre, and their likes and dislikes.

6.6 Caution is required in interpreting the findings of the household interview surveys, which are derived from respondents' existing shopping trip patterns. This is because the relationship between respondents' answers on shopping centre visits does not necessarily correlate directly with their actual expenditure in centres. Checking of the survey responses against other indicators suggests that in some cases the popularity of Bury St Edmunds may have been exaggerated. This is probably because, although it is the respondent's principal shopping destination for the specified range of goods, a proportion of their expenditure is attracted elsewhere. We refer to these issues in our quantitative assessment in subsequent sections of the report.

7 Bury St Edmunds - Centre Audit

7.1 Bury St Edmunds is a service centre for an extensive area of West Suffolk. It is located on the A14 trunk road some 45 km from Cambridge in the west and 44 km from Ipswich to the south east.

7.2 It is an historic market town and ecclesiastic centre of national significance. It was laid out in the 12th century as a medieval planned town and has an exceptional range of historic buildings from early timber framed structures to buildings of the later periods, especially Georgian, and also Victorian. Its rich heritage of buildings is one of the key attractions of the town. It is essential that new development in the centre respects this heritage.

7.3 A major recent change in the town centre was opening of the 'Arc' retail development in Spring 2009, which is a striking new feature of the built environment in the town centre as well as major new destination for shoppers and visitors to the town.

Catchment Area and its Demographic and Social Profile

Catchment area

7.4 The catchment area for Bury St Edmunds (and Haverhill) has been defined with reference to the Study Area Zones illustrated in Appendix 1. Zones 1 and 2 are treated as being the primary catchment area (PCA) of the town. The Study Area as a whole represents an outer catchment area (OCA). In 2010 the PCA had a population of some 88,224 persons (see Section 9). The Study Area (PCA+OCA) had a population of 418,264 persons.

7.5 The town has accommodated a consistent level of growth over a lengthy period of time, averaging 225 new homes a year since 1991; and significant population growth is expected in Bury St Edmunds over the forecast period to 2031 (see Section 9).

7.6 The attractiveness and wide draw of the town centre is illustrated by the findings of the street interview surveys, which indicate that notwithstanding the Study Area’s geographic extent, 17% of respondents’ home addresses lay beyond its boundaries. Unfortunately, we do not have comparable information from the 2006 survey with which to make a comparison.

Demographic and Social Profile

7.7 The demographic and social profile of an area has an influence on spending potential within the area and shopping patterns. The most comprehensive source of information on the demographic and social profile is the decennial censuses, of which the 2001 census is the most recent for which this information is currently available.

7.8 We provide below a bullet point summary of the key demographic and social characteristics of the Bury St Edmunds catchment as compared with the national average.

Population

- Age profile – Lower proportion in the under 30 age group. Higher proportion of the over 50s, and particularly the 80+ groups.
- Marital status - Higher proportion of married persons.
- Social Grade – Higher proportions of Groups AB 'Higher/intermediate managerial/admin/professional' and C2 'Skilled manual workers'. Lower proportions of Groups D 'Semi-skilled and unskilled manual workers' and E 'On state benefit, unemployed, lowest grade workers'.

Ethnic Origin

- Higher proportion of white, and lower proportions of all other groups.

Dwelling Type

- Higher proportion of detached dwellings.

Tenure

- Higher proportions of owner occupied and privately rented. Lower proportions of shared ownership and socially rented.

Car Ownership

- Significantly higher proportions of households with two or more cars.

Economic Activity

- Lower proportions of unemployed and students. Higher proportion of retired.

Occupation

- Higher proportions in agriculture, extra-territorial organisations and bodies, wholesale and retail trades and repairs, health and social work, and manufacturing (in order of importance).

Commuting

- Higher proportions working from home, and travelling by bicycle, car or motor cycle.

Town Centre Health Indicators

7.9 References to Bury St Edmunds town centre in this section of the report should be treated as relating to the area defined by the former Shopping Centre designation (unsaved Policy TCR1) on the Proposals Map for the Replacement St Edmundsbury Local Plan 2006. A map showing the extent of the area included can be found in Appendix 4.

Diversity of Uses

7.10 There is a broad range of uses within Bury St Edmunds town centre, which are set out below in Table 7.1.

Table 7.1 Bury St Edmunds Town Centre Diversaity of Uses

Use Class	Number of Units	Percentage of Units	Floorspace - Gross (sq. m)	Percentage of Floorspace
A1	318	67%	68,200	64.6%
A2	45	9.5%	10,510	10%
A3	36	7.6%	6,240	5.9%
A4	16	3.4%	3,920	3.7%
A5	11	2.3%	1,320	1.3%
B1	24	5.1%	5,020	4.8%
B2	2	0.4%	250	0.2%
B8	2	0.4%	740	0.7%
C1	2	0.4%	1,820	1.7%
D1	9	1.9%	2,670	2.5%
D2	5	1.1%	4,930	4.7%
Sui Generis	9	1.9%	1,220	1.2%
Totals	475		105,520	

7.11 The table shows the representation of uses in the town centre by both units and floorspace. The proportions by unit and floorspace are broadly similar. The majority of floorspace (68,200 sq. m or 64.6%) within the town centre is in use as Shops (Use Class A1). The second, third and fourth most common uses are Financial and Professional Services (Use Class A2) at 10%, Restaurants and Cafes (Use Class A3) at 5.9% and Offices (Use Class B1) at 4.8%, respectively.

7.12 Of the Use Class A floorspace within the centre (90,190 sq. m gross), the overwhelming majority is in use for comparison goods at 60,754 sq m gross (67.4%), with 7,446 sq m (8.3%) being utilised for convenience floorspace. The level of convenience floorspace within the centre is significantly below the UK average for all town centres, which is 17.3% of Use Class A floorspace.

Retailer and Services Representation

7.13 Bury St Edmunds has a good level of national multiple retailers representation within the centre, including Debenhams, Marks and Spencer, Boots, Argos, Mothercare, H&M, Waitrose, Tesco, Waterstones and HMV.

7.14 According to the GOAD Centre Report for Bury St Edmunds (survey date 29 March 2011), 36.4% of the outlets within the centre were being utilised by national multiple retailers. This is slightly above the UK average of 30.1% indicating a healthy national multiples representation within the centre.

7.15 The centre also has a strong independent retailer representation, particularly on the secondary streets of the centre such as St Johns Street.

7.16 The Arc Shopping Centre has enabled the centre to increase the amount of national multiple retailers by providing modern larger format units, which are more suitable to the needs of such retailers, rather than the smaller units provided by the numerous historic buildings within the centre. As well as re-introducing Debenhams to the town, the Arc has been highly successful in attracting multiple fashion clothing and footwear retailers. These include; Top Shop, Hobbs, Fat Face, New Look, River Island, and H&M; many of which are newcomers to the town centre.

Primary and Secondary Shopping Frontages

7.17 Based on retailer representation and shopper footfall, the following streets are considered to comprise the primary shopping frontages within the town centre:

- § Cornhill;
- § Butter Market;
- § The Traverse;
- § Gosnold Street (Arc Shopping Centre);
- § Auction Street (Arc Shopping Centre); and
- § Charter Square (Arc Shopping Centre).

7.18 Beyond the primary shopping frontages, St John's Street in particular performs a strong role as a secondary shopping street, and accommodates a large number of independent retailers. We comment further on the shopping structure of the centre in Section 11 and refer to plans of the primary shopping area and primary shopping frontages.

Centre Ranking

7.19 We have interrogated on-line information from Venuescore to identify the performance of Bury St Edmunds town centre compared with other UK centres (town and out of town shopping centres) at 2011. Venuescore provides a range of indicators. We have used the following:

- § 'Venuescore Rank' represents the performance of the centre in terms of the number of multiples present in the centre - The ranking is out of 365 major cities and major district venues and 2,288 centres overall in the UK;
- § 'Fashion Index' is an index measure of the degree to which the centre's venue's offer is biased towards 'fashion' (average = 100);

- ‘Tourist Index’ is a measure of the degree to which the centre’s offer is biased towards retailers with a Tourist focus (average = 100).

7.20 Table 7.2 outlines the rankings obtained for Bury St Edmunds and other town centres within and outside the catchment.

Table 7.2 Venuescore Rankings

	Venuescore Rank	Fashion Index	Tourist Index
Bury St Ed	**123**	**130**	**139**
Cambridge	36	137	225
Ipswich	53	119	147
Newmarket	373	105	77
Thetford	615	56	25
Stowmarket	701	49	-
King’s Lynn	114	128	108

7.21 The comparison towns are those that are closest to Bury St Edmunds. We have included King’s Lynn, because it is within the region and has some similarities to Bury St Edmunds in terms of its size and function. The dominance of both Cambridge and Ipswich is expected. However, it is noticeable that Bury St Edmunds performs strongly both in terms of its orientation towards fashion and tourism. King’s Lynn is fairly similar to Bury St Edmunds in terms of its Venuescore Rank and Fashion Index, but is well behind in terms of tourist oriented retailers.

7.22 In the 2007 Retail Study, Bury St Edmunds ranked 204 out of 363 major cities and major district venues, and 2,226 out of all centres in the UK. Bury St Edmunds has therefore risen up the rankings considerably (91 places) since 2007, which is no doubt as a result of the new retail provision delivered by the Arc Shopping Centre.

Retailer Demand

7.23 The PMA Promis Retail Report (generated September 2011) for the town centre indicates that there were 17 retailer requirements as of July 2011. This is above the average for a centre of this size (Major Town), which is 13 retailer requirements. Retailers expressing an interest (as of October 2011) include: Ann Summers, Bensons for Beds, BrightHouse, Card Factory, Ecco, Fenn Wright Manson, Gerry Weber, Lakeland, Lush, Mint Velvet, Paper Kisses, Past Times, Pavers, Peacock Group plc, Scope, Shoe Zone and YMCA Charity Shop.

7.24 Focus (November 2011), records two retailer requirements only for Bury St Edmunds town centre. These were by Charles Clinkard (footwear) for prime space of 1,250-3,250 sq ft, and Topps Tiles 5,400-10,000 sq ft. The latter probably relates to the town as a whole.

7.25 The Retail Study (2007) identified a total of 40 retailer and Class A3 Use requirements (33 comparison goods retailers and service businesses and 7 convenience retailers) for Bury St Edmunds. This was based on information from Focus and approaches made to specific retailers.

7.26 The reduction is undoubtedly an indicator of the effects of the recession on retailers' aspirations. It is also due to some retailer requirements having been satisfied by the new retail floorspace provided at the Arc Shopping Centre.

Vacancies

7.27 There were 36 vacant units recorded at the time of our town centre audit visit. This equates to 8.4% of the overall number of Use Class A units within the centre. The level of vacancies indicate that the centre is performing well despite the current economic climate, as the national average for vacant outlets within centres is 13.1% according to a GOAD Centre Report (dated 29 March 2011).

7.28 The Council monitors vacancies within the town centre and has information extending back to September 2009. This shows that the level of vacancies has been fairly constant ranging from 6%-8%.

Rental Levels

7.29 A PMA Promis Retail Report (generated September 2011) indicates that as of mid 2011 Zone A prime rents were £105 per sq. ft, a decrease of 3.6% per annum between the end of 2008 and mid 2011. The rental level being achieved is just above the average (£103 per sq. ft) for a centre of this size (Major Town).

7.30 A Focus Report (generated November 2011) shows the historic Zone A prime rents for the centre extending back to 1987 from 2009. This indicates that the rental peak in 2007 / 2008 reached £115 per sq ft, but fell back to £90 per sq ft in 2009.

Pedestrian Flows

7.31 Information on pedestrian flows has been obtained from Pedestrian Market Research Services (PMRS). PRMS conducted a survey of pedestrian flows within Bury St Edmunds in May 2010. The counts were taken at 30 locations around the centre on a Friday and Saturday. Full details of the survey can be found at Appendix 5, where a copy of the PRMS Report is provided.

7.32 Table 7.3 places in rank order the ten busiest locations recorded. The table confirms, as expected, that the central streets of Abbeygate, Cornhill and Butter Market within the core of the historic centre are amongst the busiest within the centre. In addition to this the table indicates that the Arc Shopping Centre has become one of the busiest parts of the centre only a short period of time after opening.

Table 7.3 Pedestrian Flows (ranked in terms of flows)

	Survey Location	
1	Greggs Baker	11 Abbeygate Street
2	Sports Direct	30-32 Cornhill
3	Javelin	38 Abbeygate
4	Peacocks	Gosnold Street (The Arc Shopping Centre)
5	Animal	Auction Street (The Arc Shopping Centre)
6	Marks & Spencer	22-24 Butter Market
7	Nat West Bank	Central Walk
8	Superdrug	37-39 Cornhill
9	Stead & Simpson	Market Thoroughfare
10	Blacks	Charter Square (The Arc Shopping Centre)

Accessibility

Car Parking

7.33 There are approximately 3,321 car parking spaces provided within the centre. The majority of car parks appeared to be well used during our visits to the centre. The car parking provided as part of the Arc Shopping Centre was not fully used during our visits. However these were not undertaken at peak shopping periods.

Bus

7.34 The bus station off St Andrews Street is situated within the northern part of the centre within easy walking distance (approximately 200m) of the core shopping area. There are a number of connections provided to other parts of the town, surrounding villages and neighbouring towns, including Mildenhall, Haverhill, Thetford and Newmarket. Additionally, National Express provides services to more distant destinations including Cambridge, Ipswich and Peterborough.

7.35 The services provided are frequent, with some services running twice an hour and others every hour, on Mondays to Saturdays. As expected services on Sundays are reduced.

Rail

7.36 The railway station is located approximately 600m north of the town centre. Rail connections to neighbouring settlements (Dullingham, Newmarket, Thurston, Elmswell and Stowmarket) and further afield are available, including Ipswich (two an hour on weekdays – more frequent during peak times), Cambridge (one an hour on weekdays – more frequent during peak times) and Peterborough (two every four hours on weekdays – more frequent during peak times). Bus services serve the station providing local connections for passengers arriving by rail.

Cycle

7.37 Cyclists are reasonably well provided for within Bury St Edmunds centre. There are a number of cycle parking areas around the centre providing adequate provision for cyclists wishing to cycle into the centre.

7.38 There are also a number of established and signed cycle routes across the centre and town providing links with the suburbs and surrounding villages and towns. There are however limited on-road dedicated cycle lanes within the centre and across the town as whole; although these are present along Ribysgate Street, King's Road and Beetons Way.

Pedestrian

7.39 In general the accessibility of the town centre for pedestrians is good. The pedestrianised streets and connecting alleyways allow for ease of movement across the centre. Whilst pedestrian connections between the Arc and the core of the centre are present and utilised, they are relatively narrow and any improvements to these linkages to allow for the easier flow of people between the two shopping areas would be beneficial for the town centre as a whole.

Environmental Quality

7.40 The majority of the town centre provides a pleasant shopping environment. A large proportion of the centre is designated as a conservation area reflecting the historic environment and listed buildings that are present. The pedestrianised areas and vehicle restrictions within the centre help create this pleasant environment.

7.41 The streets are not cluttered with street furniture and are well maintained with limited litter and graffiti present.

7.42 The Arc Shopping Centre provides a modern, spacious and pedestrianised environment for shoppers that is of a high quality, although it is physically separated from the historic core by St Andrews Street South, which has few active frontages and predominantly performs a servicing function.

7.43 There are strong pedestrian flows between the Arc and Cornhill, via two alleys linking Gosnold Street and Auction Street respectively. Any opportunities to improve linkages particularly from Auction Street to Cornhill should be taken.

7.44 Overall the environmental quality of the town centre is high. Many parts of the centre benefit from traffic restrictions and pedestrianisation, including much of Abbeygate Street. Further traffic control measures that would readdress the balance between pedestrians and vehicles in Cornhill/Buttermarket could be considered, but the benefits of improving the shopper pedestrian environment would need to be balanced against the maintenance of good access into the core of the centre.

Shopper / Visitor usage of the Town Centre

7.45 The on-street surveys undertaken (400 in total) provide a good insight into people's usage of the town centre. For the purposes of interpreting the interview responses we have treated respondents' references to Bury St Edmunds centre as being synonymous with the defined town centre to which we have referred earlier in this Section and which has formed the basis of analysis elsewhere in this report. Full details of the results from the on-street surveys can be found in Appendix 3.

Mode of travel

7.46 People were asked how they travelled to Bury St Edmunds town centre. 44.3% of respondents came by car (as driver), 21.5% by bus, 16.5% on foot, 13.3% by car (as a passenger) and 1.3% answered by train, Other less common (less than 1%) modes of travel included cycle, motorcycle, mobility scooter, taxi and coach.

7.47 Comparing the above results with the 2006 survey results, it is clear that the dominant mode of travel to access the centre remains the car as a driver (45.4% in 2006). However, it would appear that there has been a degree of a modal shift, as there are now more people using the bus (previously 10%) rather than arriving as a passenger in a car (20.6% in 2006). The number of people arriving on foot has decreased from 19%.

Purpose of Visit

7.48 The principal reason for visiting Bury St Edmunds town centre is non-food shopping (36.3% of respondents) followed by food shopping (16.3% of respondents). Other less common purposes (under 10%) include meeting friends and/or family, shopping in the market, using financial services, work in or near to town centre and business.

7.49 In 2006, the equivalent figures were 30% non-food shopping and 15% food shopping, indicating that the town's role as a non-food shopping destination has been enhanced since the opening of the Arc Shopping Centre.

7.50 With regard to the responses on what else, if anything, people were doing in the town centre, 31.8% stated they had no other purpose for their visit (38.2% in 2006 survey), 28% non-food shopping, 21.3% food shopping, 7.8% financial services, 7% visiting restaurant/café/bar/public house, 6.8% shopping in the market, 3.8% meeting friends and/or family and 3% answered tourism and sightseeing. Other answers included other social or leisure reasons, dry cleaner, doctor/dentist/medical appointment and using other services.

7.51 In comparison with the 2006 results, the three most common responses are the same as above. There has been a slight increase in the number of people stating that they were doing non-food shopping (up 4%) and food shopping (3.3%). In addition to this the number of respondents stating 'no other purpose' has decreased since 2006. This would suggest there has been a slight increase in linked trips being undertaken.

Why Bury St Edmunds?

7.52 People using shops and/or services were asked why they chose to come to Bury St Edmunds town centre. The most common responses (above 4%) received can be divided as follows: 55.1% stated close to home/live here; 8.5% good range of non food shops/shops that I like; 5.3% close to work; 4.4% visiting as a tourist/day tripper; and 4.1% good foodstores.

7.53 In 2006 the most common response was similar, with 49% stating close to home as the reason they choose Bury St Edmunds. However, the second most common answer in the 2006 survey 'because it is an attractive place to visit' did not feature as highly (previously 10% compared to 1.8% in 2011 survey). A similar number of respondents (9% in 2006) identified the 'good provision of non food shops' as the reason for their choice.

Frequency of visits

7.54 People were asked how often they visit the town centre for a variety of purposes. Table 7.4 provides an overview of the responses received.

Table 7.4 Frequency of Visit

Answer	Food	Non-food	Financial / Personal Services	Leisure Facilities	Pubs / Cafes / Restaurants / Nightclubs
Everyday/most days	6.5%	5.5%	1.3%	2.5%	2.3%
2-3 times a week	19%	17%	7.5%	4.8%	6.3%
Once a week	25%	33%	24.8%	11%	13.5%
Once a fortnight	6%	12%	7.3%	4.3%	9.3%
Once a month	6%	12.5%	10.8%	11.5%	20%
Less than once a month	8.8%	11%	16.8%	13%	13.8%
First visit	2.8%	2.8%	1.8%	2.3%	2.3%
Never	25.3%	4.5%	27.5%	48%	30.5%
Don't know	0.8%	1.8%	2.5%	2.8%	2.3%

7.55 Comparing the above with the 2006 survey results, it can be seen that for food shopping there has been an increase in the number of respondents coming once a week (from 21.8% to 25%) and two to three times a week (from 5.6% up to 19%). Conversely the number of respondents stating that they never do food shopping in the centre has decreased from 29.5% to 25.3%. A similar number of respondents cited once a fortnight and once a month (12% in both surveys).

7.56 In respect of non-food shopping the frequency of people's visits has increased with 50% of respondents stating they come 2-3 times a week or once a week, compared to 43.6% in 2006. Additionally, the number of respondents identifying that they never come to Bury St Edmunds for non-food shopping has decreased (from7.9% to 4.5%).

7.57 For financial and personal services there were minimal differences between the two survey results.

7.58 For leisure facilities there has been a reduction in the number of respondents stating 'never' from 53.8% to 48%. In addition to this the number of respondents identifying that they come 'once a month' has increased, whilst those stating they come 'less often than once a month' has decreased. This indicates that there has been an increase since 2006 in the number of people visiting the centre, more frequently, to use leisure facilities.

7.59 With regard to pubs, restaurants, cafes and nightclubs the number of respondents stating 'once a week', 'once a fortnight' and 'once a month' have all increased since 2006, whilst those stating 'never' has decreased (down from 37.2% to 30.5%). This would suggest there has been a slight increase in the frequency of visits for this purpose since 2006.

Length of stay

7.60 In terms of the amount of time people are spending in the town centre, the survey results indicate that the majority of people (57.3%) are spending between one and three hours.

7.61 The results of the on-street surveys are as follows:

- 30.5% - 2-3 hours;
- 26.8% - 1-2 hours;
- 16.3% - 3-4 hours;
- 12.8% - 4-8 hours;
- 8.8% - 30 minutes to an hour;
- 3.5% - 8 hours or more; and
- 1.5% - less than 30 minutes.

7.62 Consistent with the town centre's enhanced role as a non-food shopping destination suggest, the length of stay has increased since 2006, with the largest proportion of visitors spending 2-3 hours in the centre, whereas in 2006 the largest percentage was 1-2 hours.

Improvements to Centre

7.63 People were asked what improvements to the town centre they felt were required at present. Table 7.5 lists the top five most popular improvements suggested.

Table 7.5 Centre Improvements

Improvement	%
No improvements	53%
Lower car park charges	9.8%
More/better parking	8.3%
Better public transport	6.5%
More/better shops	3.8%

7.64 The above clearly shows a high level of satisfaction by the majority of respondents. All the suggested improvements can be found in the on-street survey results for question 9 in Appendix 3.

7.65 When the above results are compared with the previous survey results from 2006, the enhanced perception of the retail offer available in Bury St Edmunds is apparent, as only 3.8% suggested more/better shops as an improvement compared to 18% previously. Additionally, the percentage of respondents stating that they 'did not want any improvements' has risen from 39% in 2006 to 53% in 2011. This clearly shows that shoppers/visitors satisfaction with the centre has increased.

Usage in the evening

7.66 In respect of the usage of the town centre in the evening, people were asked what their main reason for visiting in the evening was; how often they visited the centre in the evening; how they rate the range of evening attractions; and how they rate the quality of evening attractions.

7.67 The most popular reasons for visits were (above 10%):

§ Cafes/Restaurants – 63.2%;

§ Cinema – 50.3%;

§ Pubs/Bars – 36.1%;

§ Theatres – 17.4%; and

§ Live music – 12.3% .

7.68 Compared with the 2006 survey results cafes and restaurants remains the most common reason. However the cinema and the theatre have become more common reasons, with those stating 'cinema' increasing from 30% to 50.3% and theatres increasing from 8% to 17.4%. Additionally 'live music' was not even previously identified as a reason. The above indicates that the use of the centre for leisure related uses has increased since 2006.

7.69 With regard to the frequency of peoples visits to the centre in the evening Table 7.6 details the results.

Table 7.6 Evening Frequency of Visit

Answer	%
Never	61.3%
Once a month	14%
Less often than once a month	9%
Once a week	7%
Once a fortnight	4%
2-3 times a week	3.3%
Everyday/ most days	1.5%

7.70 The above results are similar to the 2006 survey results, ‘never’ is still the most common answer, whilst ‘once a month’ and ‘less often than once a month’ are still the next two most common answers, although they have switched positions. The results indicate that the majority of people (interviewed during the day) still never visit the town centre in the evening and that the frequency of visits for those that do has remained the same.

7.71 Table 7.7 details the results of the questions related to opinions on the range and quality of evening attractions.

Table 7.7 Opinions on Evening Attractions in Bury St Edmunds

Answer	Range of Evening Attractions (2011 Survey)	Range of Evening Attractions (2006 Survey)	Quality of Evening Attractions (2011 Survey)	Quality of Evening Attractions (2006 Survey)
Very Good	19.4%	10.4%	18.1%	7.5%
Good	**57.4%**	**56.6%**	**58.7%**	**53.8%**
Neither Good nor Poor	16.8%	20.2%	16.8%	23.7%
Poor	1.9%	8.1%	1.3%	9.2%
Very Poor	-	1.7%	0.6%	1.2%
Don’t know	4.5%	2.9%	4.5%	4.6%

7.72 Compared with the results from the 2006 survey, there has been an increase in the percentage of respondents citing that the range of evening attractions is ‘very good’ (from 10.4% to 19.4%) and ‘good’ (from 56.6% to 57.4%). Similarly, in terms of the quality of evening attractions there has been an increase in the percentage of respondents identifying that the attractions are of a ‘very good’ quality (from 7.5% to 18.1%) and ‘good’ (from 53.8% to 58.7%). These results suggest that the range and quality of evening attractions in the centre has been improved since 2006 and this has been noted by users.

Likes and Dislikes

7.73 The on-street surveys conducted asked people what they liked and disliked about the town centre during the day and in the evening. Respondents were allowed to identify multiple reasons. Therefore the percentages outlined in this section reflect the percentage of all respondents (400 people) who identified the particular reason.

Day

7.74 The most common likes (above 10%) about the centre in the day were:

- Good non-food shops (35%);
- Good market (32%);
- Historic buildings (29.3%);
- Attractive architecture / buildings (25.5%);
- Good food shops (21.8%);
- Good cafes, restaurants or public houses (16.8%);
- Tourist attractions e.g. Abbey and Cathedral (15.8%);
- Clean streets (14.3%)
- Easy to get to from home (13.3%); and
- Attractive shop fronts/ shopping streets (12%).

7.75 The above shows that the good retail provision of non-food shops and the market are key reasons why people like Bury St Edmunds. In addition the results indicate that the quality of the built environment, particularly the historic elements, are a key factor in the centres attractiveness to shoppers/visitors.

7.76 The 2006 survey results showed that the same two likes were the most common, with ‘good retail provision of non-food shops’ at 28.3% and ‘the market’ at 22.3%. Additionally, it is apparent that there has been an increase in the number of respondents stating these likes. ‘Historic buildings’ and ‘attractive architecture/buildings’ were also popular likes in 2006, with 10.4% and 16.9% (respectively) of respondents identifying these. Again, the number of respondents identifying these as their likes has increased in the 2011 survey. ‘Good food shops’ was also a popular like in 2006 (10.9%) and again an increased number of respondents in the 2011 survey have identified this as their like.

7.77 The most cited dislikes (above 5%) about the centre in the day were:

- Nothing or very little (61.3%) – up from 48.5% in 2006 survey;
- Car parking too expensive (9%) – up from 6.5% in 2006 survey; and
- The Arc Shopping Centre (5.5%).

7.78 The above results show the majority of people interviewed did not dislike anything specifically about the centre. Additionally, the results show that some people feel the price of car parking and the Arc Shopping Centre are negative aspects of the centre (the latter most likely being a view on the design aspects of the development). However these complaints have not been cited by a large percentage of respondents.

7.79 Interestingly, in the 2006 surveys 'the lack of particular shops or services' and 'difficult to park nearer to shops' were both identified as common dislikes, with 8.9% and 9.4% (respectively) of respondents stating them. These dislikes feature less prominently in the 2011 survey, with 3.3% of respondents citing 'difficult to park nearer to shops' and 0.8% of respondents citing 'the lack of particular shops or services'. This implies that implementation of the Arc has partially addressed these dislikes.

Evening

7.80 The most common likes (above 10%) about the centre in the evening were:

- Good cafes, restaurants and/or public houses (54.8%) - up from 45.1% in 2006 survey;
- Good leisure, entertainment or culture facilities (29.7%) - up from 18.5% in 2006 survey;
- Good safety/ security (18.1%) - up from 9.2% in 2006 survey;
- Good street lighting (12.9%) - up from 4% in 2006 survey;
- Attractive architecture/ buildings (11.6%) - up from 4.6% in 2006 survey;
- Easy to get to by car (11.6%)

7.81 The results outlined above indicate that the provision of evening leisure and cultural facilities within the centre is the principal reason people like Bury St Edmunds in the evening. In addition to this the quality of the environment and accessibility by car are also reasons why people like to visit the Centre in the evening. Interestingly, the 2006 survey results showed that 15.6% of respondents stated that they liked 'nothing or very little' about the centre in the evening. This indicates that increased leisure provision within the centre since 2006, including the Apex, has improved people's perception of the centre during the evening.

7.82 The most cited dislikes (above 5%) about the centre in the evening were:

- Nothing or very little (61.9%) - up from 54.9% in 2006 survey;
- Gangs, youths and anti-social behaviour (9%) - 9.2% in 2006 survey; and
- Feels unsafe (5.8%) – down from 6.9% in 2006 survey.

7.83 The above results indicate that the majority of respondents who use the centre in the evening are content with the centre. However, the results do clearly show that there are still some concerns about anti-social behaviour and safety.

Retail Facilities outside the Town Centre

7.84 There is one retail park situated outside the centre, known as St Edmundsbury Retail Park. The following retailers are present (as of December 2011): Dreams; Carpetright; Dunelm; Ponden Homes Superstore; Pets at Home; Homebase; Currys; Comet; and DFS.

7.85 In addition to provision at St Edmundsbury Retail Park, there is some comparison/specialist retail provision at Barton Business Centre, including The Original Factory Shop, Kitchenology, Frames Conservatories Direct, Neptune and Opulence.

7.86 There is also a significant number of standalone units across the town as a whole, which include: Matalan (Easlea Road); Glasswells World of Furniture (Newmarket Road); House of Harmony (Easlea Road); Plumb Centre; Tile Giant; Motor Spares; Slumbers; Abbeygate Ceramic Tiles; Topps Tiles; Magnet; Menswear Factory Shop; Screwfix; Arco; Pets Place; Bury St Edmunds Garden Centre; Marlows Garden Centre; Travis Perkins; CWT Country Supplies; Direct Furniture (Tayfen Road); And so to bed; and Dream Doors.

7.87 Convenience provision outside the centre includes a range of supermarkets and local stores. The principal supermarkets are Asda (Western Way) 6,456 sq. m gross, Sainsbury's (Bedingfield Way) 6,274 sq. m gross, Tesco (St Saviours Interchange) 6,380 sq. m gross, and the Co-Op (Mildenhall Road) 1,937 sq. m gross.

7.88 Local stores include: Tesco Express (Stamford Court/Westgate); Costcutter (Newmarket Road); Farmfoods (Barton Road); One Stop (Cadogen Road); Premier (Lake Avenue); Spar (St Olaves Precinct); and Tesco Express (Lawson Place).

Development Plan Allocations, Commitments and Proposals

Development Plan Allocations

7.89 Across the town as a whole there are four allocations from the Replacement Local Plan (2006) which include retail development and/or are within the town centre.

7.90 The first one is referred to as the Town Centre Development Area (Policy BSE7) and proposes the comprehensive redevelopment of the area (retaining existing residential properties) which must be subject to an agreed masterplan. Part of this allocation has been brought forward under the Arc Shopping Centre development. However, there is further land within the designation which could be developed in the future. We understand that the remainder of this allocation will be subject to review in the preparation of the Bury St Edmunds Vision 2031 AAP.

7.91 The second one is called St Andrews Street North (Policy BSE10) and is proposed to accommodate an extension to the bus station as part of proposals for enhanced car parking on the site. We understand that this allocation will be subject to review in the preparation of the Bury St Edmunds Vision 2031 AAP.

7.92 The third allocation is Tayfen Road (Policy BSE9), which provides for a mixed use development including retail warehousing floorspace, a foodstore, leisure uses and residential.

7.93 The fourth allocation is the Station Hill Development Area (Policy BSE6). This allocates land for mixed use development including residential, office and other B1 industry, leisure uses and small scale retail provision to serve local needs.

Commitments

7.94 There is one significant commitment within Bury St Edmunds (as of December 2011). The allocated site at Tayfen Road (Policy BSE9) outlined above has an adopted Masterplan (2009) in place including retail uses. We have treated these as a commitment within this Study.

Proposals

7.95 We are aware of one proposal (as of December 2011), which is the subject of a planning application, for the provision of an Aldi foodstore on the site of a former car showroom on Newmarket Road.

8 Haverhill - Centre Audit

8.1 Haverhill lies in the southern part of the Borough some 22 km to the south east of Cambridge and 25 km to the south west of Bury St Edmunds. It serves a number of surrounding smaller settlements in addition to the town itself. However, ease of access to Cambridge and proximity to other retail centres has limited Haverhill's catchment as a retail centre.

8.2 The town has consistently accommodated high levels of growth and is well placed to make a contribution to the accommodation of growth in the Cambridge sub-region. In addition the proximity of Stansted Airport (approximately 30 minutes drive time) is resulting in a number of residents working at the airport as well as businesses locating in the town that require easy access to the airport.

8.3 There is a Council led programme of investment in Haverhill to help strengthen the centre and to promote inward investment. This investment has recently included the development of a multiplex cinema and restaurants (opened autumn 2008) and refurbishment of the town's leisure centre (opened July 2009).

Catchment Area and its Demographic and Social Profile

8.4 In 2010 the town had a shopper catchment population of 46,275 persons (see Section 9). The restricted role and draw of Haverhill is illustrated by the findings of the street interview surveys, which indicate that 2% only of respondents home addresses lay outside the Study Area boundary. This is a much lower figure than for Bury St Edmunds (17%), despite Haverhill lying close to the Study Area boundary.

8.5 We provide below a bullet point summary of the key demographic and social characteristics of Haverhill's catchment as compared with the national average.

Population

§ Age profile – Higher proportion in the 30-64 age group.
Lower proportions in the 14-24 and 65+ groups.

§ Marital status - Higher proportion of married persons.

§ Social Grade – Higher proportion of Group C2 'Skilled manual workers'..
Lower proportion of Group E 'On state benefit, unemployed, lowest grade workers'.

Ethnic Origin

- Higher proportion of white British and lower proportion of all other groups.

Dwelling Type

- Higher proportion of detached dwellings.

Tenure

- Higher proportion of owner occupied with mortgage. Lower proportion of shared ownership and socially rented.

Car Ownership

- Significantly higher proportions with two or more cars.

Economic Activity

- Higher proportion of self employed. Lower proportion of unemployed and students. Higher proportion of retired.

Occupation

- Higher proportions in agriculture, manufacturing, and extra-territorial organisations and bodies

Commuting

- Higher proportions working from home, and travelling by car or van.

Town Centre Health Indicators

Diversity of Uses

8.6 All references to Haverhill town centre in this section refer to the primary shopping area for the town, which we have recommended (see Section 12). This is broadly the same as the Shopping Centre designation (unsaved Policy TCR1) on the Proposals Map for the Replacement St Edmundsbury Local Plan 2006. A map showing the extent of the area included can be found in Appendix 6.

8.7 Table 8.1 (overleaf) details the range and quantity of uses within Haverhill town centre. The Table shows the representation of uses in the town centre in terms of both units and floorspace. The proportions of units and floorspace are broadly similar for most uses apart from offices.

8.8 In terms of floorspace, the figures show that the majority of floorspace (14,130 sq. m or 54.7%) within the town centre is in use as Shops (Use Class A1). The second, third and fourth most common uses are Financial and Professional Services (Use Class A2) at 14.7%, Offices (Use Class B1) at 8.5%, and Drinking Establishments (Use Class A4) at 7.6%, respectively.

8.9 Of the Use Class A floorspace provided within the town centre, the vast majority is in use for comparison retail (12,660 sq. m gross or 58.4%) whilst only 1,470 sq m gross or 6.8% of floorspace is in use for convenience retail. The amount of Use Class A floorspace in the centre being utilised for convenience retail is significantly below the UK average for all centres, which is 17.3%. It should be noted that these figures take account of the closure of the Coop store (November 2011).

Table 8.1 Haverhill Town Centre Diversity of Uses

Use Class	Number of Units	Percentage of Units	Floorspace - Gross (sq. m)	Percentage of Floorspace
A1	99	60.4%	14,130	54.7%
A2	23	14%	3,790	14.7%
A3	6	3.7%	810	3.1%
A4	7	4.3%	1,950	7.6%
A5	11	6.7%	1,010	3.9%
B1	8	4.9%	2,190	8.5%
D1	5	3.1%	1,290	5%
Sui Generis	5	3.1%	650	2.5%
Totals	**164**		**25,820**	

8.10 On the edge of Haverhill town centre there are some additional town centre uses, which are utilised by people visiting the town centre. These include Hotel (Rose and Crown Hotel) and Leisure uses (Cineworld and Leisure Centre). In addition to this there are two foodstores, Tesco and Aldi, which increase significantly the level of convenience retail provision serving the centre. Combined both foodstores provide a further 5,314 sq m gross of convenience floorspace.

Retailer and Services Representation

8.11 Haverhill Town Centre (as defined by the proposed primary shopping area) does have a number of national multiple retailers represented, although there are significantly fewer than at Bury St Edmunds. The main national multiples present include Argos, Peacocks, Boots, W H Smith, Card Factory and Bon Marche.

8.12 On the edge of the town centre there are two additional national multiples - Aldi and Tesco.

8.13 According to a GOAD Centre Report (survey date 10 August 2009) for Haverhill town centre (which includes provision on the eastern side of Erhinghausen Way but not Tesco), 41.1% of the retail provision within the centre is provided by national multiple retailers. Although this is actually above the UK average of 30.1%, an important issue in Haverhill is a dearth of quality comparison multiple stores.

Primary and Secondary Shopping Frontages

8.14 Haverhill town centre is linear in nature with limited retail provision off the main thoroughfare, which includes the High Street, Market Hill and Queen Street.

8.15 The existing primary shopping frontage extends from the Market Hill / Camps Road and Swan Lane Junction along the High Street to a position near to where Jubilee Walk joins the High Street.

8.16 Secondary shopping frontages at either end of the primary frontages cover Queen Street to the north west and the remainder of the High Street to the south east of its junction with Jubilee Walk.

Centre Ranking

8.17 We have interrogated on-line information from Venuescore to identify the performance of Haverhill town centre compared with other centres at 2011. Venuescore provides a range of indicators. We have used the following.

- ‘Venuescore Rank’ represents the performance of the centre in terms of the number of multiples present in the centre. The ranking is out of 2,288 centres in the UK;
- ‘Food Index’ is an indexed measure of the degree to which the venue's offer is biased towards ‘foodservice’ (average = 100);
- ‘Fashion Index’ is an index measure of the degree to which the centre’s venue's offer is biased towards ‘fashion’ (average = 100); and
- ‘Tourist Index’ is a measure of the degree to which the centre’s offer is biased towards retailers with a Tourist focus (average = 100).

8.18 Table 8.2 outlines the details of the rankings obtained for Haverhill and other town centres within and outside the catchment.

Table 8.2 Venuescore Rankings

	Venuescore Rank	Food Index	Fashion Index	Tourist Index
Haverhill	**559**	**100**	**68**	**22**
Cambridge	36	152	137	225
Sudbury	327	123	42	55
Braintree	343	42	76	28
Newmarket	373	80	105	77
Saffron Walden	681	101	96	109
Halstead	1,650	-	34	-

8.19 The comparison towns are those that are closest to Haverhill. Other than Cambridge, which is clearly the dominant centre in the area, there are a number of relatively small centres surrounding Haverhill, of which Sudbury, Braintree and Newmarket are larger, and Saffron Walden and Halstead are smaller. Unsurprisingly, Haverhill is well below average as in terms of its orientation towards fashion trading and tourism. The distinctiveness of Newmarket is evident, as is Saffron Walden as a destination for tourists.

8.20 In the 2007 Retail Study the Venuescore ranking for Haverhill was 593. The town has since risen 34 places up the rankings over a 4 year period and is now ranked 559 out of 2,288 centres across the whole of the UK.

Retailer Demand

8.21 According to Focus (November 2011) there was only one requirement for Haverhill town centre by Snap Fitness for between 2,992-10,226 sq. ft. In contrast a Focus Town Report for Haverhill indicates that in January 2010 there were 8 retailer requirements for the town centre.

8.22 The previous Retail Study (2007) for St Edmundsbury identified a total of 12 retailer requirements (8 comparison retailers and 4 convenience retailers) for Bury St Edmunds. This was based on information from Focus and approaches made to specific retailers.

8.23 Retailer requirements for the centre are therefore lower than in the 2007 Retail Study. This reflects the centre's lack of attraction to retailers and the effect the recession has had on their aspirations.

Vacancies

8.24 All references to Haverhill town centre in this section of the report relate to the proposed primary shopping area.

8.25 There was a total of 11 vacant units recorded within the town centre at the time of our centre audit visit (November 2011). This equates to 7.5% of the overall number of Use Class A units within the centre. The level of vacant units is below the national average for vacant outlets within centres, which is 13.1% according to a GOAD data (2011).

8.26 The Council monitors vacancies within the town centre and has information extending back to Sep 2009. This shows that the level of vacancies has been fairly constant ranging from 4.8%-8% over this period.

Rental Levels

8.27 A Focus Town Report for Haverhill (generated November 2011) outlines the historic Zone A prime rents for the centre extending back to 1987 from 2009. This indicates that there was a rental peak in 2007/2008 when rents reached £50 per sq. ft, before falling back to £40 per sq. ft by 2009.

Pedestrian Flows

8.28 The flow of pedestrians was surveyed during our centre visits. The linear nature of the centre dictates that pedestrian flows are limited to one main route along the High Street and Queen Street. Concentrated pedestrian movements were also noted between Jubilee Way and the High Street, Crown Passage and Market Hill, and the Camps Road/Market Hill and Queen Street junction.

Accessibility

Car

8.29 The centre is easily accessible by car from within the town and surrounding settlements. Accessing the centre by car was the second most popular mode of transport used by respondents to the on-street surveys, with 32% of people stating they had accessed the centre as a driver of a car.

8.30 There are approximately 554 car parking spaces provided within the centre. The majority of car parks appeared to be well used during our visits to the centre. On the edge of the centre there is additional parking associated with the Tesco and Aldi foodstores.

Bus

8.31 The Bus Interchange off Ehringshausen Way is situated close to the main High Street (approximately 50 metres) allowing easy pedestrian access to the core shopping area. 11.5% of respondents to the on-street surveys indicated that they accessed the centre by bus.

8.32 There are a number of frequent connections (two an hour / one every hour - Mondays to Saturdays) provided to other parts of the town, surrounding villages and neighbouring towns, including Bury St Edmunds, Cambridge, Sudbury, Saffron Walden, Halstead and Newmarket.

Rail

8.33 There is no railway station in Haverhill, the nearest station being at Dullingham which is located approximately 9 miles away.

Cycle

8.34 The centre is accessible by cycle with a number of cycle routes linking the centre with the wider town and surrounding villages. There are a number of roads (Hamlet Road, Withersfield Road from Meldham Bridge into the centre, and Sturmer Road on approach to Chalkstone Way roundabout) with cycle lanes provided. Only 1% of the people surveyed on-street quoted cycle as their means of accessing the centre.

8.35 In terms of parking there is a reasonable level of provision (86 racks) provided in a eleven locations within and on the edge of the centre.

Pedestrian

8.36 The accessibility of the centre for pedestrians is considered good. The pedestrianised streets, traffic calming measures and restrictions, and connecting alleyways provide pedestrians with the priority over other modes of travel and allow for safe and easy movement within the centre. The survey results show that 45% of the people surveyed accessed the centre on foot.

Environmental Quality

8.37 The environmental quality of Haverhill centre is reasonable. Part of the centre is a designated conservation area and the historic built environment does create an attractive centre for shoppers. There are, however, parts of the Queen Street area that have a somewhat run-down feel. The main retail frontages of Queen Street / Market Hill / High Street contain a mix of building styles and ages, with differing contributions to the quality of the environment.

8.38 The pedestrianised sections and traffic calming on the High Street, Market Hill and Queen Street create an environment that is generally welcoming, safe and pleasant with priority accorded to shoppers on foot.

8.39 Generally buildings and the streets within the town centre are well maintained and there was minimal litter and graffiti present during our visits.

8.40 We have commented previously on the poor linkages between the High Street / Queen Street area and the new retail and leisure developments to the east of Erhinghausen Way, and the need to integrate these areas more effectively.

8.41 The on-street surveys conducted asked respondents questions regarding their opinion on the attractiveness of the centre both during the day and the evening. Table 8.3 outlines the results for both questions.

Table 8.3 Opinions on Centre Attractiveness

Answer	Attractiveness in the day	Attractiveness in the evening
Very Good	12.5%	8.2%%
Good	35%	31.1%
Neither Good nor Poor	34%	44.3%
Poor	14%	11.5%
Very Poor	3.5%	1.6%
Don't know	1%	3.3%

8.42 The above table shows that the majority of people consider that the centre is 'good', or 'neither good nor poor', both in the day and in the evening.

Shopper / Visitor usage of the Town Centre

8.43 The on-street surveys undertaken (200 in total) provide a good insight to peoples usage of the town centre. The surveys were conducted at three locations along the main thoroughfare throughout the week between the hours of 10:00 and 16:00.

8.44 For the purposes of interpreting the interview responses we have treated respondents' references to Haverhill town centre as being synonymous with the proposed primary shopping area to which we have referred earlier in this Section of the report, plus provision on the eastern side of Erhinghausen Way (Tesco, Aldi, Cineworld etc.).

8.45 Because the survey locations were along the main thoroughfare of the centre, the particular trip patterns of visitors to shopping and leisure facilities on the eastern side of Erhinghausen Way will not necessarily have been fully accounted for. It is important to bear this in mind when observing some responses, for example on leisure usage of the centre.

8.46 Full details of the results from the on-street surveys are in Appendix 3.

Mode of travel

8.47 People were asked how they travelled to Haverhill town centre. 45% of respondents came on foot (40% in 2006 survey), 32% by car as driver (45% in 2006 survey), 11.5% by bus, 8% by car as a passenger, 2% by taxi, 1% came on a cycle and 0.5% used a mobility scooter.

8.48 Comparing the above results with the 2006 survey results, it would appear that there has been a slight modal shift from those using the private car as driver to on foot. Despite this the private car remains a common mode of travel overall.

Purpose of visit

8.49 People were asked two questions on the purpose of their visit to the centre, which sought to establish the main purpose of their visit as well as any other purpose.

8.50 In terms of the main purpose of their visit, 25.5% of respondents stated that non-food shopping; 23.5% stated food shopping; 9.5% stated meeting friends and/or family; 8.5% stated using financial services; 8% identified using other services; 7% stated business; 6.5% stated work in or near the town centre; 3.5% stated other social or leisure reasons; and 2.5% stated shopping in the market. Other less common responses included tourism and sightseeing; visiting the leisure centre; education; access to transport services; dry cleaner; doctor/dentist/medical appointment and charity shop.

8.51 Consistent with its role of as a service centre for a less wide catchment, the reasons for visiting Haverhill are more diverse including use of other services and meeting friends and family. It is noticeable from the above results that food shopping as a main purpose has increased from 12.5% in 2006 to 23.5% in 2011, presumably due to opening of the Tesco store and the extension to the Aldi.

8.52 With regard to the responses on what else, if anything, people were doing in the town centre 37% stated they had no other purpose for their visit; 32.5% stated non-food shopping (32.5% in 2006 survey); 22% identified food shopping (18% in 2006 survey); 11.5% stated visiting restaurant/café/bar/ public house; 10% stated financial services; 3.5% identified meeting friends and/or family; and 3% stated shopping in the market. Other answers included business, education, visiting the leisure centre and using other services.

Why Haverhill?

8.53 Those people using shops and/or services were asked why they chose to come to Haverhill. The responses received can be divided as follows - 78.9% stated close to home/live here; 10.5% stated close to work; 3.5% identified close to friends/family; 1.2% stated good foodstores; 1,2% stated easy to get to by car; and 1.2% stated banking. Other responses (under 1%) included good range of non food shops/shops that I like, visit the market, attractive environment/nice place, visiting as a tourist/day tripper, leisure centre, and familiarity with area.

8.54 The above findings show that the vast majority of people chose to visit Haverhill town centre because they live there and/or work there.

8.55 In comparison with the 2006 survey findings, there has been an increase in the number of respondents stating ‘close to home/live here’ and ‘close to work’ - previously 60.2% and 6.5% respectively.

Frequency of visits

8.56 People were asked how often they visit the town centre for a variety of reasons.

8.57 In terms of food shopping, 34% stated 2-3 times a week (15.6% in 2006 survey); 23.5% once a week (21.5% in 2006 survey); 15.5% never (29.5% in 2006 survey); 13.5% everyday/most days; 5.5% once a fortnight; 4% once a month; and a further 4% stated less often than once a month. These results show that the majority of respondents are frequently visiting the town centre for food shopping. Compared to the 2006 survey results, the above results indicate that there has been an increase in the number of people making frequent trips to the town centre for food shopping. This suggests the new Tesco store and the extended Aldi store have had an impact on residents’ shopping patterns by bringing them into to the town centre to do their food shopping.

8.58 In respect of non-food shopping, 31% stated 2-3 times a week (15.5% in 2006 survey); 28% once a week (28.5% in 2006 survey); 13.5% once a fortnight (11.2% in 2006 survey); 12% once a month; 6% everyday/most days (6.5% in 2006 survey); 5.5% less often than once a month; and 4% stated never(7.9% in 2006 survey). The above indicates that the majority of respondents are visiting the town centre for non-food shopping relatively frequently with 59% visiting either 2/3 times a week or once a week. The above results show, when compared to the 2006 survey results, that there has been an increase in the frequency of peoples visits for non-food shopping and that less people are never coming for this purpose.

8.59 For financial or personal services, 34% answered once a week (24.6% in 2006 survey); 19.5% 2-3 times a week (8.9% in 2006 survey); 12.5% once a month (13.6% in 2006 survey); 11.5% once a fortnight; 10% never (26.1% in 2006 survey); 8.5% less often than once a month; and 4% stated everyday/most days. The above indicates the majority of respondents are visiting the town centre for non-food shopping relatively frequently with 53.5% visiting either 2/3 times a week or once a week. Compared to the 2006 survey results, there has been an increase in the frequency of people's visits to the town for this purpose and a significant decrease in the number of people never visiting.

8.60 In terms of leisure facilities, 54.5% of respondents stated 'never' (53.8% in 2006 survey); 12.5% 'once a month' (9.2% in 2006 survey); 11.5% 'once a week' (8.2% in 2006 survey); 10% 'less often than once a month' (17.1% in 2006 survey); 5.5% '2-3 times a week' and 5% answered 'once a fortnight'. 0.5% of people stated they did so everyday/most days and 0.5% of respondents stated that this was their first visit to the centre to use the leisure facilities. These results show that just over half of the respondents never visit the town centre for leisure facilities. However, it is important to bear in mind that people were questioned in the core shopping area during the daytime.

8.61 For those that do visit the centre for leisure facilities, the above results show that the frequency of their usage is fairly mixed with a similar number of respondents coming once a week compared to once a month. When compared to the 2006 survey results, it would appear that people are coming more frequently. It is important to note that the patronage of Cineworld and Leisure Centre may not have been fully accounted for by these results due to the location of the survey points.

8.62 In respect of pubs, cafes, restaurants and/or nightclubs, 35.5% answered never (37.2% in 2006 survey); 17.5% once a week (12.4% in 2006 survey); 13.5% 2-3 times a week (7.7% in 2006 survey); 13% once a month (14.6% in 2006 survey); 10% less often than once a month (18.6% in 2006 survey); 8.5% once a fortnight (6.2% in 2006 survey); and 2% stated everyday/most days. A sizeable proportion of respondents never visit the town centre for pubs, cafes, restaurants and/or nightclubs, which is consistent with the 2006 survey results. The above results do however suggest that there has been an increase in the number of people making fairly frequent visits to the centre for this purpose, with 31% of respondents stating 'once a week' or ' 2-3 times a week compared to 20.1% in 2006. Again it is important to note that the patronage of Prezzo and Frankie & Benny's may not have been fully accounted for by these results due to the location of the survey points.

Length of stay

8.63 The survey results indicate that the majority of people (64.5%) are spending between half an hour and two hours In the centre. The actual results of the on-street surveys are as follows - 36.% stated 1-2 hours; 28% 30 minutes to an hour; 11.5% 3-4 hours; 9% 2-3 hours; 8.5% less than 30 minutes; 6% 4-8 hours; and 0.5% answered 8 hours or more.

8.64 The results are similar to those recorded in the 2006 survey results.

Improvements to Centre

8.65 People were asked what improvements to the centre they felt were required. Table 8.4 lists the top five most popular improvements suggested.

Table 8.4 Centre Improvements

Improvement	2011 %	2006 %
More / better shops	38.5%	36%
No improvements	29%	24.5%
More traffic free pedestrian streets	10.5%	6%
Marks & Spencer	6%	N/A
Better range of clothes shops	4%	N/A

8.66 It is clear from the above results that increased\better provision of shops remains the dominant preference. Additionally, more pedestrianised streets also remains something people would like to see within the centre. All the suggested improvements can be found in the on-street survey results for question 9 in Appendix 3.

Usage in the evening

8.67 In respect of the usage of the town in the evening, people were asked what their main reason for visiting the centre in the evening was, how often they visited the centre in the evening, and how they rate the range and quality of the evening attractions.

8.68 In terms of the purpose of peoples visits in the evening, 36.1% stated pubs/bars (66.3% in 2006 survey); 36.1% cafes/restaurants (25% in 2006 survey); 32.8% cinema (25% in 2006 survey); 18% the Arts Centre (16,3% in 2006 survey); 3.3% nightclubs; 3.3% leisure centre; 3.3% work; and 3.3% answered for a walk. Less common responses included meet friends/family, takeaways, place of worship. The above results indicate that there has been an increase in people visiting the centre in the evening for cafes/restaurants whilst there has been a decrease in people visiting pubs/bars. Additionally, both the Cinema and Arts Centre are more popular than five years before.

8.69 With regard to the frequency of peoples visits to the centre in the evening, 69.5% of respondents stated never (60% in 2006 survey); 11.5% less often than once a month (9.5% in 2006 survey); 7.5% once a month (7.5% in 2006 survey); 3.5% once a week (10% in 2006 survey); 3.5% once a fortnight (5.5% in 2006 survey); 2.5% 2-3 times a week (6.5% in 2006 survey) and 1.5% answered everyday/most days. These results show that the majority of respondents never visit the centre in the evening (as in 2006 survey) and also indicate that people's usage of the centre in the evening has become less frequent. It should be noted that this does not necessarily reflect of the frequency of visits to leisure provision on the eastern side of Erhinghausen Way due to the location of the survey points.

8.70 Table 8.5 details the results of the questions related to opinions on the range and quality of evening attractions.

Table 8.5 Opinions on Evening Attractions in Haverhill

Answer	Range of Evening Attractions (2011 Survey)	Range of Evening Attractions (2006 Survey)	Quality of Evening Attractions (2011 Survey)	Quality of Evening Attractions (2006 Survey)
Very Good	8.2%	7.5%	6.6%	3.8%
Good	**34.4%**	18.8%	**36.1%**	32.5%
Neither Good nor Poor	27.9%	27.5%	29.5%	**38.8%**
Poor	23%	**37.5%**	21.3%	21.3%
Very Poor	3.3%	10%	1.6%	2.5%
Don't know	3.3%	2.5%	4.9%	1.3%

8.71 The results in table 8.5 indicate that more people rate the range and quality of evening attractions as 'good' than in 2006. In addition to this, it is clear that a significant number of people consider the range and quality of evening attractions to be poor, or neither good nor poor.

Likes and Dislikes

8.72 The on-street surveys conducted asked people what they liked and disliked about the town centre the during day and in the evening.

Day

8.73 The most common likes during the day were:

- § Nothing or very little (33.5%) – 24.5% in 2006 survey;
- § Good non-food shops (21.5%) – 11% in 2006 survey;
- § Easy to get to from home (20.5%) – 32% in 2006 survey;
- § Easy to park car (9.5%) – 3% in 2006 survey; and
- § Good cafes, restaurants and/or public houses (8.5%) – 5.5% in 2006 survey.

8.74 The above shows that approximately 1/3 of people interviewed expressed 'no likes' in respect of the centre. The reason 'easy to get to from home' is still common. In 2006 this was the dominant reason quoted by 32% of respondents. Interestingly, though there has been an increase in the number of respondents stating 'good non-food shops'.

8.75 The most cited dislikes during the day were:

- Poor range of shops (38%) – 46.5% in 2006 survey;
- Nothing or very little (35.5%) – 23.5% in 2006 survey;
- Too many cheap shops/charity shops (6.5%) – 4.5% in 2006 survey; and
- Lack of clothes shops (4%).

8.76 The above results show that people feel the centre could have a better range of shops. However, it also shows that a good proportion of people are content (or disinterested), with the centre with 35.5% citing 'nothing or very little'.

Evening

8.77 The most common likes in the evening were:

- Nothing or very little (32.8%) – 37.5% in 2006 survey;
- Good cafes, restaurants and/or public houses (26.2%) – 30% in 2006 survey;
- The Arts Centre (16.4%) – 17.6% in 2006 survey; and
- Good leisure, entertainment or culture facilities (8.2%) – 2.5% in 2006 survey.

8.78 The above shows that there is nothing notable about the centre in the evening for approximately 1/3 of people interviewed. Additionally, the above shows that the cafes, restaurants and public houses in the centre are liked, and specifically the Arts Centre is clearly something that is appreciated by a reasonable proportion of respondents. There has been little change since 2006. However, more respondents in 2011 stated good leisure, entertainment or cultural facilities as their like about the centre.

8.79 The most cited dislikes in the evening were:

- Nothing or very little (44.3%) – 28.8% in 2006 survey;
- Feels unsafe (19.7%) -20% in 2006 survey;
- Gangs, youths and anti-social behaviour (16.4%) – 17.6% in 2006 survey;
- Poor street light (6.6%) 2.5% in 2006 survey; and
- Vandalism (6.6%) – 7.5% in 2006 survey.

8.80 The above results show that the majority of respondents are content with the centre (or disinterested) with the centre in the evening. However, the results do clearly show that people are (still) concerned about safety and anti-social behaviour.

8.81 Only 3.3% of respondents in 2011 survey identified poor leisure, entertainment or cultural facilities as a dislike. This compares with a figure of 22.5% in 2006. This suggests that the improvements in this type of provision on the eastern side of Erhinghausen Way has addressed this previously common dislike.

Retail Facilities outside the Town Centre

8.82 There is one retail park situated outside the centre, known as Cambridge Road or Haverhill Retail Park. The following retailers are present (as of November 2011); Halfords and B&Q.

8.83 In addition to the retail park there are three standalone retail units situated to the south of the town centre. These are Buildbase, Travis Perkins and Petco.

8.84 Convenience provision outside of the centre (including edge of centre) ranges from supermarkets to local stores. The supermarkets present are the Sainsbury store (Haycocks Road) at 5,961 sq m gross, Aldi (Lords Croft Lane) at 1,022 sq m gross, and Tesco (Cangle Road) at 6,083 sq m gross. Local stores include a Londis on Gloucester Road.

Development Plan Allocations Commitments and Proposals

Development Plan Allocations

8.85 Across the town of Haverhill there is one Development Plan allocation which involves the provision of new retail. The allocation is the strategic site north west of Haverhill (Policy HAV2), which proposes residential, education, recreational open space and retail as part of a local centre.

8.86 In addition to the above, Policy HAV5 of the Replacement Local Plan (2006) states that an indicative Masterplan will be prepared for Haverhill town centre. This was prepared and the emerging Vision 2031 Haverhill AAP will now determine how the town centre will be developed and improved in the future.

Commitments

8.87 There is one commitment that has been identified for Haverhill, for which planning permission has been granted. This is at the former Project Office Furniture site for the erection of 11 business start-up units, nine warehouses, a builders merchants, three retail units, and a restaurant with drive-thru-takeaway(Class A3/A5). In total 4,558 sq. m gross (3,924 sq. m net) of retail floorspace is proposed.

Proposals

8.88 We are not aware of any significant proposals in Haverhill town centre (as of December 2011).

9 Quantitative Retail Assessment

9.1 We have treated retail uses as being those falling within Class A1 of the Use Classes Order 1987. References to convenience and comparison goods floorspace are based on Experian definitions (Retail Planner Briefing Note 9).

Convenience goods comprise the following listed items:

Food; alcoholic drink; tobacco; newspapers and magazines; and 90% non-durable household goods.

Comparison goods comprise:

Clothes, footwear and other fashion goods; Books, music DVDs and toys; Chemist toiletries and cosmetics; Furniture carpets and soft furnishings; Electrical goods (e.g. computers, TVs, washing machines, cookers etc); Household goods, glass, china and tableware; DIY, Hardware and Gardening Goods.

9.2 It should be noted that **'bulky goods'** do not fall wholly within specific goods categories. The 'Furniture carpets and soft furnishings' and 'DIY, Hardware and Gardening Goods' categories are mostly made up of bulky goods. However, the electrical goods category includes a range of bulky and non-bulky items.

Methodology

9.3 In assessing convenience and comparison goods floorspace needs within Bury St Edmunds and Haverhill we have adopted a step by step methodology, which is summarised below:

i) Identification of a Study Area and catchment area zones covering both Bury St Edmunds and Haverhill;

ii) Estimation of populations for the base year and forecast years for each catchment zone;

iii) Estimation of convenience and comparison goods expenditure per head for each catchment zone;

iv) From steps (ii) and (iii) calculation of available convenience and comparison goods expenditure for each catchment zone for the base and forecast years;

v) From the findings of the household shopper interview surveys, identification of the Study Area residents' expenditure attracted to existing shopping centres / facilities at the base year;

vi) From step (v) above and estimated expenditure inflows / visitor spending, assessment of the 'actual' turnover of existing shopping centres / facilities at the base year;

vii) Identification of 'benchmark' convenience and comparison goods turnovers for existing shopping centres and facilities, based on published company information and DJD estimates;

viii) From comparison of the outputs of steps (vi) and (vii) above, identification of any convenience or comparison goods expenditure surpluses at the base year, arising from the undertrading or overtrading of existing shopping centres / facilities;

ix) Identification of convenience and comparison goods expenditure surpluses at the forecast years, inputting for the forecast year in question information from steps (iv) – (vii) and including any known retail commitments;

x) Conversion of expenditure surpluses at the base and forecast years into floorspace equivalents.

Available Expenditure

Study Area and Zones

9.4 We have adopted the same Study Area and ten zones used in the 2007 Retail Study. These were defined by post-code districts and sectors, taking account of the geography of the area and location of existing service centres. The Study Area and Zones are shown in Appendix 1. Zones 1 and 2 represent the principal catchment area (PCA) of Bury St Edmunds, and Zones 8 and 9 represent the PCA of Haverhill.

Population Estimates and Forecasts

9.5 Local area population and expenditure information has been obtained from Experian Micro-Marketer, for each of the ten zones within the Study Area. The base year of the assessments is 2010. The forecast years are 2011, 2016, 2021, 2026 and 2031.

9.6 The population forecasts are set out in Tables Conv 1 and Comp 1 of Appendices 7 and 8 and summarised in the table below. The Study Area as a whole is forecast to experience a population increase of 86,299 persons over the period 2011-2031. Of this population increase 13,855 is within the Bury St Edmunds PCA, which is forecast to grow from 88,224 persons in 2010 to 102,079 persons by 2031. Haverhill PCA is expected to increase by 8,545 persons from 46,616 persons in 2011 to 55,161 persons by 2031. Having made deductions for new homes built since 2001, the population forecasts are consistent with the growth forecasts in Policy CS1 of the Core Strategy, which (as noted in Section 4) in the period 2001-2031 provide for 8,118 new homes in Bury St Edmunds and 5,301 new homes in Haverhill.

Table 9.1 Population Forecasts

Population	2011	2016	2021	2026	2031	2011-31 inc
Bury St Ed PCA	88,224	91,582	95,233	98,757	102,079	+13,855
Haverhill PCA	46,616	48,783	51,003	53,128	55,161	+8,545
Study Area	418,264	439,934	462,726	484,495	504,563	+86,299

Expenditure per Head Estimates and Forecasts

9.7 All monetary figures in the assessments are expressed in 2010 prices.

9.8 The base and forecast years expenditure per head figures for convenience and comparison goods in each of the ten Zones is set out in Tables Conv 2a and 2b, and Comp 2a and 2b.

9.9 Expenditure per head growth over the forecast years have been made utilising Experian's forecast growth rates for both convenience and comparison goods as set out in Figures 1a and 1b of Experian's Retail Planner Briefing Note 9 (September 2011). These rates, which include some years of decline as well growth, are shown in the table below. It should be noted that in current uncertain economic climate these growth forecasts will inevitably be subject of change over time. It is for this reason that we have identified explicitly below and in the Appendices the rates that have been used and which can be monitored.

Table 9.2 Expenditure per head Estimates

Expend per h'd growth	2010	2011	2012	2013	2014-2018	2019-2031
Convenience	+0.85%	-0.3%	-0.4%	+0.5%	+0.5%	+0.6%
Comparison	+0.1%	+0.5%	+1.6%	+2.1%	+3.0%	+3.0%

9.10 Allowance has been made for expenditure which is spent in non-store destinations, known as Special Forms of Trading (SFT). The principal channel through which most SFT sales occurs is the internet. However NSRT also includes consumer expenditure in markets, vending machines, and through catalogues, television shopping channels and from door to door sales.

9.11 Experian's Retail Planner Briefing Note 9 Appendix 3 provides an estimate of SFT on a year by year basis, which is shown in Tables Conv C1 and Comp CM1. For convenience goods the Experian SFT recommended proportions of available expenditure grow from 3.7% in 2010, to 6.3% in 2021, and 7.0% in 2031. For comparison goods the equivalent recommended rates are 8.8% at 2010, 12.4% at 2021, and falling back slightly to 12.0% in 2031.

9.12 The definitions of, and issues surrounding, SFT and their implications for shop floorspace needs are becoming increasing complex. For example to avoid problems of goods delivery, an increasing number of shoppers are now ordering goods on-line but collecting them from a store. Also some supermarkets source their internet food purchases from the local store sales area floorspace. The growth and form of SFT should be monitored over time.

9.13 Convenience and comparison goods expenditure per head having deducted SFT is shown in Tables Conv 2b and Comp 2b.

Available Convenience and Comparison Goods Expenditure

9.14 Estimates of available convenience and comparison goods expenditure are set out in Tables Conv 3, and Comp 3. These are derived by applying the average expenditure per head figures (Table 2) to the population estimates (Table 1) for each of the forecast years.

9.15 Total available convenience expenditure in the Bury St Edmunds and Haverhill PCAs is summarised in the table below. Over the 21 year period 2011-2031 Bury St Edmunds PCA is forecast to experience an increase in convenience goods expenditure of £40.6m, and the Haverhill PCA an increase in comparison goods expenditure of £23.7m.

Table 9.3 Available Convenience Goods Expenditure

Available Conv Exp	2011	2016	2021	2026	2031	2011-31 inc
Bury St Ed PCA	£165.2m	£171.2m	£182.2m	£193.7m	£205.8m	£40.6m
Haverhill PCA	£87.2m	391.0m	£97.4m	£103.9m	£110.9m	£23.7m

9.16 Available convenience expenditure has been disaggregated into 'main food' (Table Conv 4a) and 'top-up' expenditure (Table Conv 4b) on the basis of a 70% / 30% split. This is judgement based on experience and also has regard to the structure of convenience retail facilities in Bury St Edmunds and Haverhill.

9.17 Total available comparison goods expenditure is summarised for the Bury St Edmunds and Haverhill PCAs below. Over the 21 year period 2011-2031 Bury St Edmunds PCA is forecast to experience an increase in comparison goods expenditure of £252.2m, and the Haverhill PCA an increase in comparison goods expenditure of £136.9m.

Table 9.4 Available Comparison Good Expenditure

Available Comp Exp	2011	2016	2021	2026	2031	2011-31 inc
Bury St Ed PCA	£253.1m	£288.9m	£349.3m	£421.5m	£505.3m	£252.2m
Haverhill PCA	£132.0m	£151.7m	£184.4m	£223.3m	£268.9m	£136.9m

9.18 Because shopping patterns for different types of comparison goods are more diverse than for convenience goods, we have broken down comparison goods expenditure into seven goods categories:

(i) Clothes, footwear and other fashion goods

(ii) Books, music and DVDs and toys

(iii) Chemist goods, toiletries and cosmetics

(iv) Furniture, carpets and soft furnishings

(v) Household goods, glass, china and tableware

(vi) Electrical goods (e.g. computers, TVs, washing machines, cookers etc)

(vii) DIY, hardware and gardening goods

9.19 It should be noted that projections of expenditure over a lengthy period are subject to margins of error. Our forecasts up to 2016 are based on the most recent estimates provided by Experian in their Retail Planner Briefing Note 9 (September 2011). These forecasts take into account the recent economic downturn and indicate significantly lower average growth rates up to 2016 than have previously been forecast. However the post 2021 forecasts in particular will need to be monitored and updated during the plan period.

Interview Survey Findings

9.20 Our analysis of existing shopping patterns within the catchment of the six centres is based on telephone Household Interview Surveys within the catchment areas of the centres undertaken in November 2011 by RMG. The findings of the surveys were used to assess the market shares of various categories of convenience and comparison goods expenditure attracted to each centre/store within each of the ten zones.

9.21 For convenience shopping the Interview Surveys identified the first choice and second choice shopping destinations for both 'main food' and 'top-up' shopping trips. 70% of residents' convenience expenditure was treated as attributable to 'main food' shopping trips and 30% to 'top-up' shopping trips. The total convenience expenditure flow to centres/stores was then derived by summing the 'main food' and 'top-up' expenditure flows.

9.22 For comparison shopping the interview surveys provided information on seven categories of goods that we have identified earlier: The survey also asked residents to apportion their spend on clothes, footwear and other fashion goods between their first and second choice destinations. 70% of residents' expenditure was treated as attributable to 'first choice' shopping trips and 30% to 'top-up' 'second choice' trips.

9.23 The Consultants' Brief referred to the need for additional out-of-centre retail warehousing provision during the plan period. Retail warehousing is most commonly associated with 'bulky' comparison goods. Bulky goods fall mainly into categories (iv), (vi) and (vii) as indicated above. However, they are by no means exclusive to these categories. Some category (v) household goods may be bulky, whilst many category (vi) goods are non–bulky. It is therefore difficult to make reliable separate quantitative assessments of 'bulky' and 'non-bulky' goods floorspace potential.

9.24 There is in any event no policy presumption that any form of retailing (bulky or non-bulky) automatically qualifies for an ‘out-of-centre’ location. We address bulky goods floorspace potential in this context in Sections 11 and 12.

9.25 Table 9.5 shows the market shares of expenditure attracted to Bury St Edmunds and Haverhill towns as a whole from their respective PCAs (Zones 1 and 2, and 8 and 9).

Table 9.5 Bury St Edmunds and Haverhill Retained Expenditure (market shares)

	Bury St Edmunds		Haverhill	
	Zone 1	Zone 2	Zone 8	Zone 9
Conv (Main food – 1st Choice)	97.1%	66.4%	91.8%	41.2%
Clothing, footwear 1st choice	83.5%	87%	28%	9.1%
Books, music, and toys	96.3%	86.6%	71.2%	15.4%
Chemist toiletries, etc	98%	70.7%	95.2%	31.4%
Furniture carpets, etc	88.5%	86.2%	33.8%	10.8%
Household goods	87.3%	84.3%	41.8%	13.2%
Electrical goods	91.7%	87.9%	70.9%	10.3%
DIY, Hardware	96.3%	88.1%	89.5%	37.8%

9.26 The most striking feature of the of the interview survey findings is the very strong performance of Bury St Edmunds in all categories of goods. We believe that in some cases the interview responses have exaggerated the amount of expenditure drawn to the town, because respondents’ expenditure is actually split between centres. We comment on this further in examining expenditure capacity for specific ranges of goods. However, even if some of the figures are exaggerated in terms of expenditure, the Bury St Edmunds responses show a strong allegiance to the town, which is a positive factor.

9.27 Haverhill performs strongly for convenience goods within its immediate catchment (Zone 8), but its performance for other ranges of goods is more variable. It performs particularly poorly for clothing and footwear, which is a key goods category in terms of the overall attractiveness of a centre. In Table 9.6 we outline the findings from the 2007 Study for comparative purposes.

Table 9.6 Bury St Edmunds and Haverhill Retained Expenditure (market shares) – 2007 Study Results

	Bury St Edmunds		Haverhill	
	Zone 1	Zone 2	Zone 8	Zone 9
All Convenience (main food)	94.1%	75%	87%	13.8%
Clothing, footwear	80%	80.7%	32%	0%
All other comparison	88.9%	80%	43.1%	3.1%
Chemist toiletries, etc	94.9%	77.2%	92.8%	8.9%
Furniture carpets, etc	91.7%	83.5%	32.1%	0%
Household Appliances	93.7%	87.4%	56%	5.9%
Household Textiles	82.2%	72.9%	38.1%	0%
Audio-visual equipment	89.6%	82.9%	58.8%	6.3%
DIY, Hardware	98.2%	83.6%	82.1%	10.9%

9.28 Owing to goods definitional changes between the Experian goods categories and the goods categories in the 2007 Study, not all the categories are capable of direct comparison. However, as might be expected because of the new retail investment, both Bury St Edmunds and Haverhill have strengthened their attraction for convenience goods. Bury St Edmunds has also strengthened its role for clothing and footwear, which is key indicator of a centre's comparison goods function. On the other hand, the appeal of Haverhill for clothing and footwear purchases has declined over the five year period (from the town zone 8).

Existing Convenience Goods Shopping Patterns

9.29 The total convenience goods expenditure attracted to all stores in Bury St Edmunds and Haverhill is shown in Table Conv 6, which shows Bury St Edmunds attracting a convenience goods expenditure of approximately £165.9m and Haverhill approximately £68m in 2011.

9.30 In the case of Haverhill this includes an allowance of 15% of the 'main food' turnover of the Tesco and Sainsbury's store turnovers being drawn from outside the Study Area, and 2% of 'main food' expenditure of the other convenience stores in the town (the latter figure is based on the findings of the Street Interview Surveys, which found that 2% of respondents lived outside the Study Area). We have made no similar allowance for Bury St Edmunds, as although the town does have a larger draw from outside the Study Area, we believe that these visitors are unlikely to be undertaking convenience shopping.

9.31 We have then gone on in Tables Conv 7a & 7b to identify the market shares of convenience expenditure attracted to Bury St Edmunds and Haverhill towns and town centres from their PCAs. This is summarised in Table 9.7.

Table 9.7 Market Share Retention of PCA Convenience Expenditure

Retained PCA Expenditure	Town	Town Centre
Bury St Edmunds	76%	18.4%
Haverhill	67.7%	6.7%

Benchmark Turnover of Existing Stores/Centres

9.32 For the purpose of ascertaining the performance of convenience goods shopping facilities at the base date, we have assessed 'benchmark turnovers' for the stores within the two centres (Table Conv 8). The gross and net floorspace is derived from IGD Foodstore data, Experian GOAD data and Drivers Jonas Deloitte estimates.

9.33 Information from Verdict UK Food & Grocery Retailers (2011) has been utilised to identify the convenience/comparison goods floorspace split and the sales density (turnover achieved per unit of floorspace) for named retailers.

9.34 Convenience Table 9 provides a summary of 'benchmark' turnovers of the stores, and compares this with their 'actual' turnover derived from the interview responses.

9.35 The strongest performing stores in Bury St Edmunds are Sainsbury Moreton Hall, Asda Western Way, and Tesco St Saviours Interchange, all of which the surveys record as having turnovers between £35 and £37.5m. Bury St Edmunds town centre convenience stores, the largest of which is Waitrose appear to be trading fairly close to company average. Outside the town centre the surveys suggest that most stores are trading fairly close to company average, with the exception of Sainsbury Moreton Hall and Co-Op Mildenhall Road which are below company average.

9.36 Within Haverhill all convenience stores are shown as undertrading with the exception of Aldi. The Co-Op is shown as trading some 70% below company average. The store closed shortly after the surveys were undertaken.

Future Convenience Goods Expenditure and Floorspace Potential

9.37 Table Conv 11 sets out the expenditure capacity position for Bury St Edmunds and Haverhill, based on the following inputs:

- Available expenditure;
- Market share of available expenditure retained (constant);
- Expenditure inflow;
- Survey derived turnover;
- Benchmark turnover of existing floorspace and commitments;
- Surplus expenditure (survey derived turnover less benchmark turnover).

9.38 The assessment is based upon the percentage share of convenience expenditure attracted to Bury St Edmunds and Haverhill remaining constant over the forecast period. This is an appropriate assumption for the purposes of a Study of this nature. However, it must be recognised that the introduction of new development to a centre may have the effect of increasing its attractiveness and the market share of expenditure attracted from its catchment. Also we have noted that in both Bury St Edmunds and Haverhill foodstore representation is good and currently a relatively high proportion of PCA expenditure is attracted to the towns.

9.39 The only convenience floorspace commitment included in the forecast is for a discount foodstore at Tayfen Road Bury St Edmunds, which we have assumed is implemented by 2013. In the case of Haverhill we have allowed for the recent closure of the Co-Op store and loss of its floorspace by 2012.

9.40 We have identified surplus expenditure on two bases. The first shows any 'latent' expenditure surplus or deficit at the base date, and includes this within the forecasts for later years. The second treats the base year as an 'equilibrium' position and only identifies additional expenditure arising over forecast years. In the case of Haverhill we have treated 2012 as being the equilibrium year, following closure of the Co-op. The expenditure capacity findings are summarised below.

Table 9.8 Convenience Goods Expenditure Capacity

	2011/12	2016	2021	2026	2031
Bury St Edmunds					
Inc 2011 latent surplus/deficit	-£16.3m	-£16.5m	-£9.6m	-£1.5m	+£7.1m
Equilibrium at 2011	0	-£0.16m	+£6.76m	+£14.8m	+£23.4m
Haverhill					
Inc 2011 latent surplus/deficit	-£26.2m	-£13.7m	-£10.4m	-£6.4m	-£2.2m
Equilibrium at 2012	0	+£1.2m	+£4.6m	+£8.5m	+£12.7m

9.41 In the case of Bury St Edmunds, we have noted earlier that the current undertrading is principally at Sainsbury Moreton Hall and the Co-Op Mildenhall Road. Notwithstanding this, the Sainsbury store is still achieving a good level of turnover. In our opinion the latent expenditure deficit reflects the good level of large foodstore floorspace in the town, as a result of which there is potential to absorb more turnover onto existing floorspace. This does not mean that there is no justification for other forms of convenience floorspace to serve other shopping needs. The 'equilibrium' figures show the expenditure potential that will emerge over the plan period for which some new floorspace will be justified. It should be noted that the 2016 figures are affected by implementation of the Tayfen Road discount foodstore, which we assume will have been implemented by that date.

9.42 The Haverhill figures show a significant expenditure deficit at 2011. This is ameliorated somewhat by 2012 by closure of the Co-Op store and the release of its floorspace from convenience trading. Nevertheless the figures suggest that the town will continue to be well provided for with convenience floorspace through the plan period. As with Bury St Edmunds the 'equilibrium' figures show the expenditure potential that will emerge over the plan period for which some new floorspace will be justified. For Haverhill we have taken 2012 as the equilibrium position following the closure of the Co-Op.

9.43 Tables Conv 12a-d convert surplus expenditure to floorspace, based on the above two scenarios, first allowing for latent potential at 2011, and second assuming equilibrium at 2011/12. They also have regard to the fact that different types of shopping facility achieve very different sales densities per unit of floorspace. The first 'Quality Store' scenario provides a floorspace equivalent taking the average turnover density of the 'top five' convenience store retailers. The second 'Local Shops' scenario provides a floorspace equivalent, assuming a low turnover / sq m based on the sales densities likely to be achieved by local shops.

9.44 Because there appears to be some undertrading in the large foodstore sector in both Bury St Edmunds and Haverhill, we summarise in Table 9.9 the findings in respect of the 'equilibrium' scenario only. We comment on these findings in Sections 11 and 12.

Table 9.9 Convenience Goods Gross Floorspace Capacity (assuming Equilibrium at 2011/2012)

	2011	2016	2021	2026	2031
Bury St Edmunds					
Quality Store	0	-16 sq m	+679 sq m	+1,472 sq m	+2,304 sq m
Local Shops	0	-40 sq m	+1,668 sq m	+3,618 sq m	5,662 sq m
Haverhill					
Quality Store	0	123 sq m	459 sq m	846 sq m	1,254 sq m
Local Shops	0	302 sq m	1,129 sq m	2,078 sq m	3,081 sq m

Existing Comparison Goods Shopping Patterns

9.45 The total comparison goods expenditure attracted to all stores in Bury St Edmunds and Haverhill is shown in Table Comp 6, which shows Bury St Edmunds attracting a comparison goods expenditure of approximately £425.2m and Haverhill approximately £62.2m. The town centres attract £307.3m and £44.2m respectively.

9.46 We have allowed for an inflow of comparison goods expenditure from outside the Study Area. We have noted in Section 7 that the Bury St Edmunds Street Surveys found that 17% of visitors surveyed lived outside the Study Area. 43% of these respondents gave comparison shopping as the prime purpose of their visit. Based on these findings we have increased by a notional 7.5% the expenditure attracted to Bury St Edmund town centre shops.

9.47 Consistent with our approach with convenience shopping, we have made an allowance of 15% of the Haverhill Tesco and Sainsbury comparison goods store turnovers being drawn from shoppers who live outside the Study Area and 2% of other comparison goods shops turnover (based on the findings of the Street Interview Surveys).

9.48 In Comparison Tables 7a, b & c we have identified the market shares of comparison expenditure attracted to Bury St Edmunds and Haverhill, towns and town centres, from their PCAs. This is summarised in Table 9.10.

Table 9.10 Comparison Goods Retained Expenditure

	Study Area	PCA
Bury St Edmunds town	34.9%	86%
Bury St Edmunds town centre	24.7%	59.5%
Haverhill town		42.6%
Haverhill town centre		31.2%

Benchmark Turnover of Existing Stores/Centres

9.49 For the purpose of ascertaining the performance of comparison goods shopping facilities at the base date, we have assessed 'benchmark' turnovers for the stores within the two centres (Table Comp 8). The gross and net floorspace is derived from Experian GOAD data and Drivers Jonas Deloitte estimates.

9.50 Mintel Retail Rankings (2011) information has been utilised to identify the sales density (turnover achieved per unit of floorspace) for named retailers. Where applicable (e.g. Marks and Spencer) information from Verdict UK Food & Grocery Retailers (2011) has been utilised to identify the convenience/comparison goods floorspace split.

9.51 Comparison Table 8 provides a summary of 'benchmark' turnovers of the stores, and compares this with their 'actual' turnover derived from the interview responses.

9.52 Within Bury St Edmunds, the interview survey results suggest that the town centre shops are trading above 'benchmark' levels. However, based on our surveys of facilities in the town centre and the relatively high sales densities that would be being achieved in the centre based on the survey results, we believe that the interview surveys have exaggerated the actual amount of expenditure that is drawn to the town centre, most probably because respondents' expenditure is actually split between centres.

9.53 Likewise, the interview surveys suggest that Haverhill town centre shops are trading above 'benchmark' levels, which we believe also may be a distortion and not reflect the position on the ground in reality.

Future Comparison Goods Expenditure and Floorspace Potential

9.54 Tables Comp 11a, b, and c set out the comparison goods expenditure capacity position for Bury St Edmunds and Haverhill, based on the following inputs:

- Available expenditure;
- Market share of available expenditure retained (constant);
- Expenditure inflow;
- Survey derived turnover;
- Benchmark turnover of existing floorspace and commitments;
- Surplus expenditure (survey derived turnover less benchmark turnover).

9.55 The assessment is based upon the percentage share of comparison goods expenditure attracted to Bury St Edmunds and Haverhill remaining constant over the forecast period. This is an appropriate assumption for the purposes of a Study of this nature. At the present time the surveys suggest that Bury St Edmunds is achieving a healthy expenditure retention rate of almost 60% from the PCA (although as indicated above this might be slightly exaggerated). On the other hand, Haverhill is drawing only some 43% of expenditure from its PCA (and even this figure may be exaggerated by the interview surveys). Clearly there is quantitative potential to accommodate new floorspace by increasing the market share of retained expenditure (although the ability to achieve this will depend upon the ability / willingness of the market to make the necessary investment).

9.56 The commitments allowed for are indicated in Table 10, the principal ones of which are retail warehousing at Tayfen Road Bury St Edmunds (3,000 sq m gross), and the retail warehousing planning permission granted at Hamlet Green, Haverhill.

9.57 As with convenience expenditure we have identified expenditure capacity on two bases. The first shows 'latent' expenditure surpluses or deficits at the base date, and includes this within the forecasts for later years. The second treats the base year as an 'equilibrium' position and only identifies additional expenditure arising over forecast years. The expenditure capacity findings are summarised below.

Table 9.11 Comparison Goods Expenditure Capacity

	2011	2016	2021	2026	2031
Bury St Edmunds Town Centre					
Inc 2011 latent surplus/deficit	+£39.8m	+£58.8m	+£97.5m	+£145.3m	+£203.1m
Equilibrium at 2011	0	+£19.0	+£57.7m	+£105.5m	+£163.3
Bury St Edmunds Non Town Centre					
Inc 2011 latent surplus/deficit	+£7.8m	+£5.3	+£19.2m	+£36.5m	+£57.7m
Equilibrium at 2011	0	-£2.5m	+£11.4	+£28.7	+£49.9
Haverhill Town					
Inc 2011 latent surplus/deficit	£5.3m	-£0.6m	+£7.9m	+£18.7m	+£31.9m
Equilibrium at 2011	0	-£5.9m	+£2.6m	+£13.4m	+£26.6m

9.58 All locations, Bury St Edmunds town centre, Bury St Edmunds non-town centre, and Haverhill town as a whole, show actual turnovers above benchmark levels. We have indicated above why we believe that this is likely to be caused by the survey responses exaggerating the actual amount of expenditure in the respective centres. For this reason we believe that the most reliable forecasts for planning purposes are those treating 2011 as being an equilibrium position. These show significant expenditure capacity growth caused by population and expenditure per head increases.

9.59 Tables Comp 12a-c convert surplus expenditure to floorspace, based on the above two scenarios, first allowing for latent potential at 2011, and second assuming equilibrium at 2011/12. Because, as indicated above, we believe the survey responses have exaggerated the actual amount of expenditure in the respective centres, we summarise below the findings in respect of the 'equilibrium' scenario only. We comment on these findings in Sections 11 and 12.

Table 9.12 Comparison Goods Gross Floorspace Capacity (assuming Equilibrium at 2011)

Floorspace Capacity gross	2011	2016	2021	2026	2031
Bury St Edmunds Town Centre	0	+4,159 sqm	+11,620 sqm	+19,533 sqm	+27,782 sqm
Bury St Edmunds Non Town Centre	0	-933 sqm	+3,923 sq m	+9,113 sqm	+14,544 sqm
Haverhill	0	-1,733 sqm	+700 sqm	+3,305 sqm	+6,032 sqm

9.60 Because of the growth of population and expenditure per head in both Bury St Edmunds and Haverhill, the floorspace capacity grows significantly over the plan period. The dip in capacity in Bury St Edmunds non-town centre and in Haverhill is caused by assumed implementation of retail warehousing at Tayfen Road Bury St Edmunds (3,000 sq m), and at Hamlet Green Haverhill.

Expansion Areas Minimum Floorspace Requirements

9.61 A key issue over the plan period will be the development of new housing expansion areas, as provided for in Policy CS11 and CS12 of the adopted Core Strategy to which we have referred in Section 4. In the interests of providing for sustainable forms of development, these expansion areas will require appropriate levels of retail and community facilities to be provided locally.

9.62 We have judged the minimum provision that should be provided locally based upon 35% of residents' convenience goods expenditure and 10% of their comparison goods expenditure being provided for by local shopping facilities, which is based upon the following considerations.

9.63 Residents should be able to undertake their day to day shopping needs without having to travel to the town centre or large 'out-of-centre' stores. In respect of convenience shopping this will include 'top-up' shopping trips, as well as a higher proportion of the convenience spending of the less mobile members of the community who may be more dependent on their local shop. A smaller proportion of comparison expenditure is likely to be spent locally. Apart from certain household products, the greatest need is for chemist / pharmaceutical products and medical prescription facilities.

9.64 In addition to retail uses, local centres require other service and community facilities. Commercial facilities can include hair stylists, hot food take-away / café, sub-post office, and public house. Non commercial uses may include community hall, doctors' surgery / health centre, and library. We have not included the floorspace requirement of these facilities.

9.65 We have illustrated in Appendix 9 the broad level of Class A1 retail floorspace provision that should satisfy the local centre requirements that we have identified above. The requirements are also summarised in Sections 11 and 12 in respect of Bury St Edmunds and Haverhill.

9.66 It should be noted that projections of expenditure over a lengthy period are subject to margins of error. Our forecasts up to 2016 are based on the most recent estimates provided by Experian in their Retail Planner Briefing Note 9 (September 2011). These forecasts take into account the recent economic downturn and indicate significantly lower average growth rates up to 2016 than have previously been forecast. However the post 2021 forecasts in particular will need to be monitored and updated during the plan period.

10 Leisure Uses Assessment

Methodology

10.1 Because of the lack of industry recognised data and assessment methods for leisure, our assessment utilises a predominantly qualitative approach to the assessment of leisure needs.

10.2 For many leisure uses, such as restaurants, provision is strongly influenced by qualitative considerations, rather than spending power within local areas. Once a reputation or critical mass is established, consumers are prepared to travel outside their local area. As such, modelling exercises often produce outputs that are over-theoretical and that do not provide a sound base on which to develop planning policies.

10.3 Our assessment has therefore focused on:

- Identification of the current supply of leisure facilities within Bury St Edmunds and Haverhill - theatres, cinemas, fitness facilities, bar and restaurants, bowling alleys, bingo halls, etc;
- Analysis of usage of leisure facilities from the household interview surveys;
- Evidence of demand (EGi database);
- Our views on market gaps and needs / opportunities to improve provision that should be planned for.

Existing Provision

Bury St Edmunds

10.4 Table 10.1 outlines the current leisure provision within Bury St Edmunds town as a whole. It shows that there is a broad range of existing leisure provision within Bury St Edmunds catering for a variety of the population's leisure needs. The level and range of provision is good for a town of its size, with two cinemas and three galleries. Provision has been increased since 2006 with the opening of The Apex facility which provides a multi-purpose venue for entertainment and business purposes.

Table 10.1 Bury St Edmunds Existing Leisure Facilities

Type of Leisure	Facility
Cinema	Cineworld
	Abbeygate Picturehouse (formerly Hollywood Film Theatre)
Leisure Centre / Sports Facility/Club	Bury St Edmunds Leisure Centre
	Moreton Hall Squash Club
	Bury St Edmunds Golf Club
Fitness/Health Clubs	Fitness First
	LA Fitness
Snooker / Billiards	Lucky Break Snooker Club
	Pot Black Snooker Club
	Athenaeum Club (Snooker and Billiards)
Theatres	Theatre Royal
Galleries / Arts Centres	Edmund Gallery
	Smiths Row Art Gallery
	The Apex
Museums	Moyse’s Hall Museum
	The Malthouse Project
	Suffolk Regiment Museum
Ten Pin Bowling	Bury Bowl
Bingo	Winners Bingo
Nightclubs	Club Brazilia
	Studio 3
	Deja Vu
Entertainment / Business Venues	The Apex

Haverhill

10.5 Table 10.2 details the existing leisure facilities present within Haverhill town as a whole.

Table 10.2 Haverhill Existing Leisure Facilities

Type of Leisure	Facility
Cinema	Cineworld
Leisure Centre / Sports Facility/Club	Haverhill Sports, Leisure and Activity Centre
	Haverhill Golf Club
Fitness/Health Clubs	Real Bodies
	Atrium Active
	Wilburs Fitness Gym
Snooker	Haverhill Snooker Club
	Haverhill Snooker and Bowl Club
Galleries /Arts Centres	Haverhill Arts Centre
Theatre	Haverhill Arts Centre
Bingo	Haverhill Arts Centre
Museums	Haverhill Local History Centre
Ten Pin Bowling	Haverhill Snooker and Bowl Club

10.6 The table shows that there is a reasonable level of existing provision in relation to the size of the town, which covers the most popular leisure needs. However, some types of provision that one might expect to see, such as nightclub, are lacking.

Usage of Leisure Facilities/Provision

10.7 The household surveys undertaken as part of this study asked respondents specific questions in respect of leisure facilities to determine their usage of the facilities provided within Bury St Edmunds and Haverhill.

10.8 The leisure facilities covered included cinema, theatre, live music venue, bowling alley, bingo, sports centre/gym, nightclub, and pubs / cafes / restaurants. Respondents who stated they used each particular type of leisure provision were asked where they go most often to access that leisure provision. The findings from the survey are outlined below for the PCAs of both Bury St Edmunds (Zones 1 and 2) and Haverhill (Zone 8 and 9).

Cinema Usage

10.9 Within Bury St Edmunds PCA there were 119 respondents on cinema usage. 96.6% of respondents stated they used the cinema provision within Bury St Edmunds. A handful of respondents cited Cambridge, Ipswich, Norwich and Mildenhall. This indicates that PCA residents rely overwhelmingly on Bury St Edmunds cinemas, no doubt because of the significant distance to be travelled to competing facilities.

10.10 In Haverhill PCA there were 85 respondents on cinema usage. 74.1% of respondents stated that they used the cinema in Haverhill; 9.4% stated Cambridge; 9.4% Bury St Edmunds; and 4.7% Braintree. These results show that, whilst the cinema in Haverhill is meeting the requirements of the vast majority of cinema users in the Haverhill PCA, people are still using alternative facilities.

Theatre Usage

10.11 In Bury St Edmunds PCA there were 80 respondents on theatre usage. 70.1% of respondents stated they used the theatre provision within Bury St Edmunds; 15% Central London; 5% don't know/varies; 3.8% Ipswich, 2.5% Norwich and 2.5% Cambridge. This indicates the popularity and usage of the theatre within Bury St Edmunds, but that there is some usage of facilities elsewhere particularly in Central London.

10.12 Within Haverhill PCA there were 57 respondents on theatre usage. 15.8% of respondents stated that they used the theatre in Haverhill; 22.8% identified Cambridge; 17.6% Bury St Edmunds; and 3.5% Ipswich. These results show that whilst the theatre in Haverhill is meeting some of the needs of the theatre users in the Haverhill PCA, people are relying upon other provision elsewhere, particularly in Bury St Edmunds and Cambridge.

Live Music

10.13 In Bury St Edmunds PCA there were 91 respondents on live music usage. 35.2% of respondents stated they went to Bury St Edmunds town centre; 18.7% don't know/varies; 12.1% Central London; and 5.5% Cambridge. Other less frequent answers included Thetford, Ipswich, and Norwich. The results show that a 1/3 of respondents use Bury St Edmunds often to listen to live music locally, with visits to other centres widely spread with no one place dominating.

10.14 Within Haverhill PCA there were 51 respondents on live music usage. 13.7% of respondents stated that they went to Haverhill town centre; 12.1% Central London; 15.7% Cambridge; 18.7% don't know/varies; 5.9% Newmarket; and 5.9% London (elsewhere). These results show that Haverhill is providing for a small proportion only of the needs of its PCA population, and that large numbers of residents are making trips to venues in other centres, particularly in London and Cambridge.

Bowling Alley

10.15 In Bury St Edmunds PCA there were 64 respondents on bowling alley usage. 88.7% of respondents stated they used provision in Bury St Edmunds; (64.1% stated in town, 26.5% elsewhere in Bury St Edmunds). In addition to this 4.7% identified Cambridge. This indicates that PCA residents rely overwhelmingly on Bury St Edmunds for this form of entertainment.

10.16 Within Haverhill PCA there were 37 respondents on bowling alley usage. 48.6% of respondents stated that they used provision in Haverhill; 16.2% identified Cambridge; 16.2% Sudbury; and 10.8% Braintree. These results indicate that Haverhill residents do visit venues in other centres, particularly in Sudbury and Cambridge, as well using local facilities.

Bingo

10.17 In Bury St Edmunds PCA there were 16 respondents on Bingo usage. 68.8% of respondents stated they used provision in Bury St Edmunds; 4.7% identified Thetford; 6.3% Ipswich; 6.3% don't know/varies; 6.3% Felsham; and 6.3% Pakenham. This indicates that PCA residents rely overwhelmingly on Bury St Edmunds for this form of entertainment.

10.18 Within Haverhill PCA there were 9 respondents on Bingo usage, the majority of whom visited Bury St Edmunds for this facility.

Sports Centre / Gym

10.19 In Bury St Edmunds PCA there were 73 respondents on sports centre/gym usage. 79.4% of respondents stated they used provision in Bury St Edmunds; 8.2% identified Stowmarket; and 2.7% Thetford. This indicates that PCA residents rely overwhelmingly on Bury St Edmunds for this type of facility.

10.20 Within Haverhill PCA there were 56 respondents on sports centre/gym usage. 76.8% of respondents stated that they used provision in Haverhill. In addition to this 5.4% identified Sudbury. This indicates that PCA residents rely overwhelmingly on Haverhill for this type of facility.

Nightclub

10.21 In Bury St Edmunds PCA there were 24 respondents on nightclub usage. 66.7% of respondents stated they used provision in Bury St Edmunds. 12.5% identified Norwich, 8.3% Newmarket, and 8.3% Stowmarket. The results show that nightclub provision in Bury St Edmunds is the most popular destination, but some facilities, particularly Norwich, are being used.

10.22 Within Haverhill PCA there were 14 respondents on nightclub usage. 28.6% of respondents stated that they used provision in Haverhill town centre, 42.9% identified Cambridge, and 14.3% Newmarket. These results show that Cambridge is the most popular destination for this type of facility, but some residents do use local facilities.

Pubs / Cafes / Restaurants

10.23 In Bury St Edmunds PCA there were 172 respondents on pubs/cafes/restaurants usage. 68% of respondents stated they used provision in Bury St Edmunds (61.6% stated in town, 6.4% elsewhere in Bury St Edmunds). In addition to this 17.4% stated don't know/varies. The results show that pubs/cafes/restaurants in Bury St Edmunds are the most popular destinations for the majority of PCA residents.

10.24 Within Haverhill PCA there were 14 respondents on pubs/cafes/restaurants usage. 40.5% of respondents stated that they used provision in Haverhill town centre; 24.8% don't know/varies; 9.1% Cambridge; and 7.4% Bury St Edmunds. These results show that whilst provision in Haverhill is used by a large number of residents, some residents are also relying on provision elsewhere, particularly in Cambridge and Bury St Edmunds.

Demand

10.25 With regard to demand for leisure facilities by providers we have not identified any current requirements through Property Market Analysis or EGi.

10.26 In terms of demand for Use Class A3, A4 and A5 provision, Table 10.3 (data provided by EGi 2011) outlines a number of reported requirements (as of January 2011) for Bury St Edmunds.

Table 10.3 Bury St Edmunds Restaurant/ Catering Facilities Demand

Operator	Minimum Size (sq. ft)	Maximum Size (sq. ft)	Location
Domino's Pizza	116	N/A	Shopping Centre
Brassiere Blanc	279	557	In town/Edge of town/Out of town
Harvester	4,047	N/A	In town/Shopping Centre/ Edge of town
Pizza Hut	296	N/A	Edge of town/Out of town
Pizza Hut	79	93	In town/Shopping Centre
Prezzo	279	325	In town
Revolution	279	929	In town
Starbucks	139	186	Edge of centre/Out of town
Tui	N/A	465	Out of town

10.27 The table shows that there is a reasonable amount of interest from A3/A4/A5 operators in Bury St Edmunds. However, some of the above requirements have been satisfied since January 2011, such as the Prezzo requirement.

10.28 We have found no evidence (from EGi) of demand for A3/A4/A5 uses within Haverhill at the present time.

Market Gaps, Opportunities and Future Provision

10.29 In this section of the report we have sought to identify any gaps in provision as well as any opportunities for additional provision in both Bury St Edmunds and Haverhill, based on our assessment of existing provision and its usage.

Bury St Edmunds

10.30 It is considered that Bury St Edmunds is reasonably well provided with leisure facilities, which serve both residents of the town and the neighbouring towns and villages.

10.31 We have not noted any significant gaps in provision, as a result of which we do not consider that specific additional provision need be planned for. However, to support and encourage private investment, mixed use development, which allows for leisure uses, should be encouraged on the potential development sites within and on the edge of the existing centre. Additionally, appropriate leisure provision to serve local needs should be encouraged in local centres as part of the proposed expansion areas.

10.32 In respect of A3 and A4 provision, opportunities should be taken to provide additional restaurants and cafes beyond the primary retail core within historic buildings, building on recent additions to the town centre, such as Carluccios and Prezzo.

Haverhill

10.33 Haverhill provides a reasonable level of leisure provision to meet the requirements of the town's population and the neighbouring villages and smaller towns. However, due to the size of the town, certain types of provision are absent and the range of provision is more limited than in Bury St Edmunds.

10.34 It is clear that since the 2007 Study, the development of a cinema and restaurants on the eastern side of Erhinghausen Way has improved significantly the leisure offer of the town, as a result of which residents no longer have to travel further afield (e.g. Cambridge) to access this type of leisure provision.

10.35 There are no major gaps in existing provision. However, the town would benefit from further improvements in evening leisure uses/provision, including a nightclub, bowling alley and additional bars/cafes/restaurants. It is not proposed that specific provision is made for the above, as achievement of these types of facility will be dependent upon delivery by the market. However, by allocating land within and on the edge of the centre for mixed use development, which includes leisure related uses, the provision of additional leisure provision can be encouraged.

10.36 Additional leisure provision for appropriate types of provision to serve local needs should be considered as part of new local centres in the proposed expansion areas.

11 Bury St Edmunds – Centre Findings

2007 Identified Needs

11.1 Paragraph 4.122 of the Core Strategy identifies the following retail, leisure and office floorspace needs in Bury St Edmunds up to 2021, based on the findings of the 2007 Retail Study.

- § The opening of the Arc Shopping Centre in spring 2009, on the former Cattlemarket site in Bury St Edmunds, will fulfil the need for comparison goods floor space until 2021 and address a weakness in terms of a lack of large modern shops. Any proposals after this date would need to be subject to a detailed retail assessment.
- § There is a qualitative and quantitative need for two new discount food stores in Bury St Edmunds.
- § There is some forecast need for additional warehouse floorspace in Bury St Edmunds which increases significantly towards 2021. This would need to be located in accordance with the sequential approach.
- § There is currently no identified need for any additional commercial leisure sites in the town, although if operator demand is forthcoming, some commercial leisure facilities, such as branded restaurants, could be included in mixed use schemes in the town centre.
- § There is no need to identify and allocate sites for new office development proposals, which should be considered on their merits in accordance with guidance in PPS6.

11.2 Our findings below build on and update these findings in the context of recent changes that have occurred in the town and our views on future potential and opportunities.

Quantitative Floorspace Forecasts

11.3 We summarise in Table 11.1 the convenience and comparison goods theoretical floorspace requirements for Bury St Edmunds, which we have identified in Section 9. The floorspace requirements treat 2011 as being in equilibrium.

Table 11.1 Bury St Edmunds Gross Floorspace Capacity (assuming Equlibrium at 2011)

	2011	2016	2021	2026	2031
Town Convenience					
Quality Store equivalent	0	-16 sqm	+679 sqm	+1,472 sqm	+2,304 sqm
Local Shops equivalent	0	-40 sqm	+1,668 sqm	+3,618 sqm	+5,662 sqm
Town Centre Comparison					
	0	+4,159 sqm	+11,620 sqm	+19,533 sqm	+27,782 sqm
Non Central Comparison					
	0	-933 sqm	+3,923 sqm	+9,113 sqm	+14,544 sqm

Town Convenience Goods

11.4 The findings of the household surveys indicate some over-provision of convenience floorspace in the town – see Appendix 7 Table 8. However, for planning purposes we have indicated above the expenditure capacity position based on a current equilibrium position. Based on our qualitative surveys of existing foodstore provision in the town, we believe that this is justified.

11.5 The town enjoys a high retention rate of residents' convenience expenditure from its PCA. The high market retention rate means that as population and expenditure grow over the plan-period a potential floorspace requirement builds up. The decline in the floorspace requirement in the period 2011-2016 is caused by assumed implementation of a discount store at Tayfen Road in this period.

11.6 There is marked difference between the sales density requirements of large quality foodstores as opposed to discount foodstores and local shopping facilities. This is reflected in a wide variation of floorspace requirements.

Town Centre Comparison Goods

11.7 The responses to the household interview surveys suggest that that town centre comparison shops are trading above average, notwithstanding the recent introduction of major new floorspace at the Arc. Our qualitative surveys of the town centre, including a variety of indicators, suggest that the town centre is trading well (particularly in the current recessionary climate). However, as indicated earlier, we believe that the interview surveys (whilst revealing the strong allegiance of residents to the town centre) have actually exaggerated the amount of their comparison expenditure attracted to the town centre. A strong indicator of this is the high sales density that town centre shops would be achieving, if the results of the surveys were treated as being wholly accurate.

11.8 In these circumstances, we believe that most appropriate approach is to treat town centre comparison shops as being in equilibrium now and to assess floorspace requirements that will arise from the growth of population and expenditure over the plan-period. The floorspace requirements shown in the table above, showing significant growth over the plan period, are based on this approach. They show a significant growth of expenditure capacity over the forecast period.

Non Central Comparison Goods

11.9 Comparison goods trading in non-central locations is performing well according to the interview survey findings. However, as with town centre retailing, we believe this may in part be due to some exaggeration within the interview responses of actual expenditure in these locations. Furthermore, non-central comparison floorspace outside the town centre is a mix of non-bulky comparison goods in the superstores and bulky goods in retail warehouses, and there is no policy reason why non-bulky comparison goods in particular should be provided for in out-of-centre locations.

11.10 The decline in requirement in the period 2011-2016 is caused by assumed implementation of 3,000 sq m of retail warehousing in Tayfen Road in this period.

11.11 Because of the growth of bulky goods expenditure there is likely to be market demand for further non central comparison goods floorspace, including bulky goods retail warehousing. Such proposals should be assessed against sequential approach requirements and impact considerations. The impact findings are likely to be informed by the expenditure capacity for the particular type of goods under consideration.

Expansion Areas

11.12 We comment separately below on the quantitative floorspace needs of the Expansion Areas.

Town Centre

Convenience Goods Shopping Needs

11.13 The principal foodstore representation in the town centre at the present time is the Waitrose store on the edge of the town centre, the recently opened Tesco Express on St Andrews Street South, the Marks & Spencer foodhall, and Iceland in Cornhill. In addition there are independent butchers, newsagents/off licences and bakers. The market is also a popular attraction for Bury St Edmunds shoppers.

11.14 In our opinion there is a reasonable balance of convenience goods traders in Bury St Edmunds town centre, and whilst additional representation by convenience shops is to be welcomed, we do not consider that this is necessary to protect the vitality and viability of the town centre.

Comparison Goods Shopping Needs

11.15 The Arc shopping centre opened in Spring 2009 has had a major impact in broadening the comparison goods offer of the town centre (as well as introducing new restaurants and entertainment uses), particularly for clothing and footwear and other fashion goods. Retailers located in the Arc, who are mainly newcomers to the town, include Debenhams (returning after a long absence) and a number of clothing and fashion goods retailers. The major contribution to the town centre is reflected in the street (and household) interview surveys.

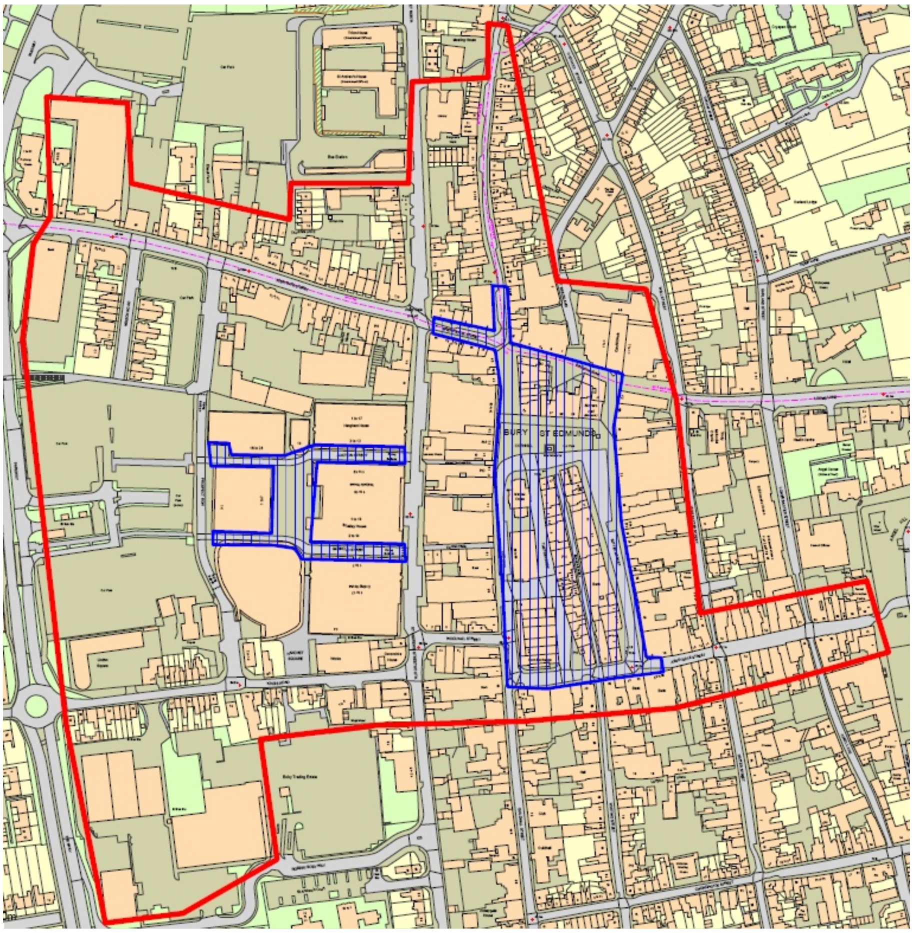
11.16 The on-street surveys show an increase in the number of people who are visiting Bury St Edmunds for non-food shopping, and an increase in the frequency of their visits. The household surveys, show that there has been an increase in the amount of available expenditure being spent within Bury St Edmunds centre, which is almost certainly a result of opening of the Arc.

11.17 In Section 9 we have identified a significant growth of comparison goods expenditure of £131m over a 20 year period (2011-2031). In accordance with Policy CS10 of the of the adopted Core Strategy (and national planning policy guidance), the first priority location for new comparison goods shopping development should be in the town centre (other than that to serve the expansion areas – see below). This is necessary to maintain and enhance the attractiveness of the town centre in the face of competition from the larger competing centres of Cambridge and Ipswich in particular. The Arc has made a major contribution, but the competing centres will continue to expand their offer and Bury St Edmunds cannot afford to stand still.

Primary Shopping Area and Primary Shopping Frontages

11.18 Based on our visits to the centre we recommend areas to be designated as the primary shopping area and primary shopping frontages.

11.19 The map overleaf shows the recommended coverage of both designations (red line = primary shopping area / blue line with hatching = primary shopping frontages). A larger version of the map is provided in Appendix 10.



Other Centre Issues

11.20 It is possible to identify within Bury St Edmunds town centre certain character areas. The historic commercial focus of the town centre is the Cornhill / Buttermarket area, where the 'high street', multiples such as Marks & Spencer and Argos continue to be located. To the south is a compact historic area laid out in a grid pattern containing a wide range of secondary retail, restaurant, hotel and other service uses, as well as small scale office uses in historic buildings, restaurants and hotels. This area lies adjacent to the cathedral and includes the historic streets of Churchgate and Abbeygate Street. There have been limited changes to the small scale domestic style historic architecture, as a result of which the area remains an historic entity which makes a major contribution to the character and attractiveness of the town centre.

11.21 To the north of Cornhill is St John's Street which is a linear historic thoroughfare flanked by historic buildings containing a number of independent specialist traders and services, such as Mick's Cycles and Repairs, Aubyn Davies (menswear) and Bury Chocolate Shop. This street provides a valuable function for the town centre as a whole in terms of diversifying and making a more interesting retail offer for shoppers.

11.22 The Arc redevelopment on the site of the former Cattle Market is a major new feature of the town centre, with its strikingly different layout and architecture. It has enabled provision to be made for modern retailer requirements without damaging intervention into the historic fabric of the town centre. Undoubtedly there has been some shift of shopping activity from other parts of the town centre, as the pedestrian surveys discussed in Section 7 of the report show. However, overall the town centre appears to be performing well with the Arc complementing existing shopping areas of the centre, rather than creating damaging competition. We noted in Section 7, however, that it would be desirable to achieve a more effective pedestrian link from the Arc to Cornhill, if the opportunity arises through redevelopment / refurbishment of properties fronting Cornhill.

Non Central

11.23 The dominant forms of retailing in Bury St Edmunds in 'non-central' locations are the three large foodstores in freestanding locations – Asda Western Way, Tesco St Saviours, and Sainsbury's Moreton Hall; and retail warehousing predominantly at St Edmundsbury Retail Park and Easlea Road.

11.24 There are no district centres in Bury St Edmunds. There are however a number of local centres located within the residential areas of the town. There is also a local centre at Moreton Hall which provides some retail provision (including a Tesco Express) alongside health and community uses.

11.25 We have identified significant potential for new convenience and comparison goods shopping facilities over the plan period. Not all of this new retail floorspace can or should be provided in the town centre. We consider below specific locational needs and the considerations that should apply in providing for new retail floorspace in non-central locations.

Expansion Areas

11.26 As noted in Section 9, a key issue over the plan period will be the development of new housing expansion areas, as provided for in Policy CS11 of the adopted Core Strategy to which we have referred in Section 4. In the interests of providing for sustainable forms of development, these expansion areas will require appropriate levels of retail and community facilities to be provided locally.

11.27 We have judged the minimum provision that should be provided locally based on local residents being able to undertake their day to day shopping needs without having to travel to the town centre or large 'out-of-centre' stores. This will include 'top-up' convenience shopping trips, as well as a small proportion of residents their comparison goods shopping needs, chemist / pharmaceutical products, some household goods etc.

11.28 In addition to retail uses, local centres require other service and community facilities. Commercial facilities can include hair stylists, hot food take-away / café, sub-post office, and public house. Non commercial uses may include community hall, doctors' surgery / health centre, and library. These are not included in the floorspace figures.

11.29 Changing commercial and consumer trends are making some of these facilities more difficult to achieve. For example chemists and prescription facilities are much less widespread. The difficulties of the public house trade and the contraction of both post office and library facilities are well documented.

11.30 We have illustrated in Appendix 9 the broad level of Class A1 retail floorspace provision that should satisfy the local centre requirements that we have identified above, which we summarise below for each Expansion Area.

North-west Expansion Area

11.31 This is expected to deliver some 900 homes in the short term. This would generate a theoretical need for a minimum additional 603 sq m gross of retail floorspace (206 sq. m comparison and 397 sq. m convenience).

Completion of the Moreton Hall Expansion Area

11.32 This is expected to deliver some 500 homes in the short term. This would generate a theoretical need for a minimum additional 405 sq m gross of retail floorspace (184 sq. m comparison and 221 sq. m convenience).

Western Expansion Area

11.33 This is expected to deliver some 450 homes in the medium term. This would generate a theoretical need for a minimum additional 289 sq m gross of retail floorspace (93 sq. m comparison and 196 sq. m convenience).

North East Expansion Area

11.34 This is expected to deliver some 1,250 homes in the long term. This would generate a theoretical need for a minimum additional 773 sq m gross of retail floorspace (215 sq. m comparison and 558 sq. m convenience).

South East Expansion Area

11.35 This is expected to deliver some 1,250 homes in the long term. This would generate a theoretical need for a minimum additional 773 sq m gross of retail floorspace (215 sq. m comparison and 558 sq. m convenience).

11.36 It may be that for some expansion areas, there are existing local centres sufficiently close-by to provide for some of these needs, and that the vitality and viability of the centres would be enhanced through having a wider catchment from which to draw, rather than creating new facilities.

Other Locations for Convenience Goods Provision.

11.37 Demand for new convenience goods floorspace in the town centre is likely to be for relatively small units and the more specialist forms of trading. There is therefore likely to be potential for new convenience floorspace in locations other than the town centre.

11.38 Bury St Edmunds is fortunate as an historic town in having had extensive ‘soft areas’ which have become available for town centre uses, principally the site of the former Cattle Market. The area to the west of the Arc is now mostly in use as extensive ground level car parking. If there is a need and demand for further retail development in the future, it may be possible to reconfigure at least some of this area to provide additional potential space for built development.

11.39 It is open to question, however, whether it would be appropriate to make provision for new foodstore development in this area. The future vitality and viability of the town centre will be determined more by its offer of quality comparison goods, and if therefore there is future potential for new floorspace in this area, it would be best retained to preserve the opportunity to attract new quality comparison retailers.

11.40 A qualitative justification for the introduction of discount foodstore(s) into the town is identified in the Core Strategy. We support the justification for introduction of a discount foodstore within the town. There are locations in need of regeneration in the inner part of the town, and Tayfen Road has already been identified in the master plan as a suitable location for a discount foodstore. It may also be in the future that a discount trader could be included as part of the local provision within an expansion area.

11.41 Any proposals for ‘out-of-centre’ convenience (or comparison) retailing should be subject of the sequential approach and impact tests. The assessment of impact will be influenced by available expenditure capacity, although there is no test of ‘need’ as such. Our quantitative findings indicate that expenditure capacity to support another large foodstore in the town is limited until the latter part of the plan period. This means that a new large foodstore would have to draw most of its trade from the existing large foodstores in the town. On the other hand the much lower level of turnover required to support a discount foodstore or local shops is unlikely to raise capacity issues, even in the short term.

Bulky Goods Provision

11.42 We previously referred to interview survey findings which suggest that there is economic potential now for additional non-central comparison floorspace in Bury St Edmunds, and that there is likely to be market demand for further non central comparison goods floorspace, including bulky goods retail warehousing.

11.43 We have noted that provision for new retail warehousing (3,000 sq m gross) has been made that will address this need. We have also stated that other proposals in non central locations should be assessed against sequential approach requirements and impact considerations.

Leisure and Other Town Centre Uses

11.44 Bury St Edmunds provides a good range of leisure provision for the residents of its PCA.

11.45 The town's cinemas cater for the requirements of the population. The Apex has provided a flexible entertainment and business space that can be used for a variety of functions and has been a notable addition to the leisure provision in the centre. Additionally, the Arc has been successful in attracting some quality restaurant uses (e.g. Carluccios). The historic area would benefit from, and provides opportunities for, small scale A3 uses (such as the Prezzo restaurant on Abbeygate).

11.46 We have found no noticeable deficiencies in existing leisure provision, and no specific provision needs to be planned for. However, mixed use allocations, which include leisure uses, should be made within the Bury St Edmunds Vision 2031 AAP to allow for the delivery of new leisure provision as appropriate. Also to cater for the future leisure needs of an increased population, additional leisure provision of an appropriate scale should be provided within local centres as part of the proposed expansion areas.

Opportunities for New Development

11.47 We have identified a number of sites which could be utilised to provide future opportunities to deliver retail and other town centre uses at Bury St Edmunds. These are:

1) Car parking associated with the Arc Shopping Centre area off Parkway;

2) Lacy Scott & Knight - Auctioneers and Valuers

3) Land to the south of Risbygate Street

4) Land off St Andrews Street North

5) Car parking to rear of Wilkinsons

6) Land to the north of Tayfen Road

11.48 A schedule of the sites identified, with a map showing the extent and location of the sites, can be found at Appendix 11.

Centre Improvements

11.49 The following improvements within the town centre could be considered, which would be beneficial to the vitality and viability of the centre:

- Improvements to the connectivity and environment between the historic town centre and the Arc Shopping Centre.
- Further traffic restrictions in the core of the town centre to enhance the pedestrian environment, subject to the access to the historic centre not being significantly impeded.

12 Haverhill – Centre Findings

2007 Identified Needs

12.1 Paragraph 4.122 of the Core Strategy identifies the following retail, leisure and office floorspace needs in Haverhill up to 2021, based on the findings of the 2007 Retail Study.

- The need for convenience goods stores will, in the short term, be met by the existing provision and the new Tesco store (opened September 2009).
- There would be sufficient expenditure from 2011 to support additional comparison goods floorspace in the town.
- The principal need in Haverhill is to introduce a greater range of shops and services and to encourage a greater concentration of retail uses in the town centre.
- There are a lack of eating out venues and further provision would improve the attractiveness of the town centre as a place to visit and the evening economy.
- There is no pressing need to identify new commercial leisure developments in Haverhill. As and when proposals arise, they should in principle be welcomed and accommodated in accordance with the sequential approach.
- Demand for new offices in Haverhill is weak and there is no pressing need to allocate new sites. However there is a need to diversify the employment base. As with Bury St Edmunds it is considered that sites coming forward should be considered on their own merits in accordance with national, regional and local policy.

12.2 Our findings below build on and update these findings in the context of recent changes that have occurred in the town and our views on future potential and opportunities.

Quantitative Floorspace Forecasts

12.3 We summarise below the convenience and comparison goods theoretical floorspace requirements for Haverhill, which we have identified in Section 9. The floorspace requirements outlined treat 2011 as being in equilibrium.

Table 12.1 Theoretical Gross Floorspace Requirements (assuming equilibrium at 2011)

	2011	2016	2021	2026	2031
Town Convenience					
Quality Store equivalent	0	123 sq m	459 sq m	846 sq m	1,254 sq m
Local Shops equivalent	0	302 sq m	1,129 sq m	2,078 sq m	3,081 sq m
Town Comparison					
	0	-1,733 sq m	700 sq m	3,305 sq m	6,032 sq m

Town Convenience Goods

12.4 Haverhill has recently experienced provision of a major new foodstore on the edge of the town centre. The surveys indicate that the town now has a high retention rate for convenience goods from the core of its catchment area (over 90% from Zone 8), but this had a major impact on convenience shops in the town, for example causing Sainsbury's at Hanchett End to trade below its company average. Overall, however, the town has benefited from an improved convenience goods offer.

12.5 Table 12.1 above, shows the theoretical floorspace requirement that would arise if any expenditure growth post 2011 is treated as justifying new floorspace. In our opinion this is an overoptimistic scenario and at the very least allowance would need to be made for the vacant Co-Op floorspace (2,369 sq m gross) to be taken up.

12.6 The survey findings indicate that an expenditure capacity justification for a significant amount of new floorspace provision is unlikely before 2021, if allowance is made for existing stores to trade closer to their company averages, and vacant space is to be taken up.

Town Comparison Goods

12.7 Unlike for convenience goods, the town has a low retention rate for comparison goods, some 42% overall from the PCA, although as noted earlier this is masked by differential performances between comparison goods sectors.

12.8 Taking 2011 as an equilibrium position, expenditure growth would indicate a need for some additional floorspace. However, our qualitative surveys of Haverhill indicate that the key need in Haverhill is to put existing town centre floorspace to more productive use, and only introduce new floorspace to the town, if it would assist in meeting this objective or benefit the town centre as a whole.

12.9 Small changes in the market share of expenditure attracted to a town can have a major impact on the theoretical potential for new floorspace provision. The apparent lack of potential and poor performance of Haverhill as a centre is illustrated by its low market share of retained expenditure. Development that would assist in increasing the attractiveness of Haverhill (increasing its market share of expenditure drawn from the catchment area) should therefore be welcomed. Any proposals for new retail development in Haverhill will need to be assessed according to whether they would assist in retaining residents' retail expenditure within the town / town centre, without having a material adverse impact on the town centre.

Expansion Areas

12.10 We comment separately below on the floorspace needs of the Expansion Areas.

Town Centre Structure

12.11 A major feature of Haverhill town centre is extensive new recent investment on the eastern side of Ehringhausen Way, which includes the new Tesco foodstore, Aldi foodstore, Cineworld, refurbished Leisure Centre, and restaurants. This has had a major positive impact on residents' views on the offer of Haverhill town centre. The results of the 2011 on-street surveys show that only 3.3% of respondents identified 'poor leisure, entertainment or cultural facilities' as a dislike, compared to 22.5% in 2006.

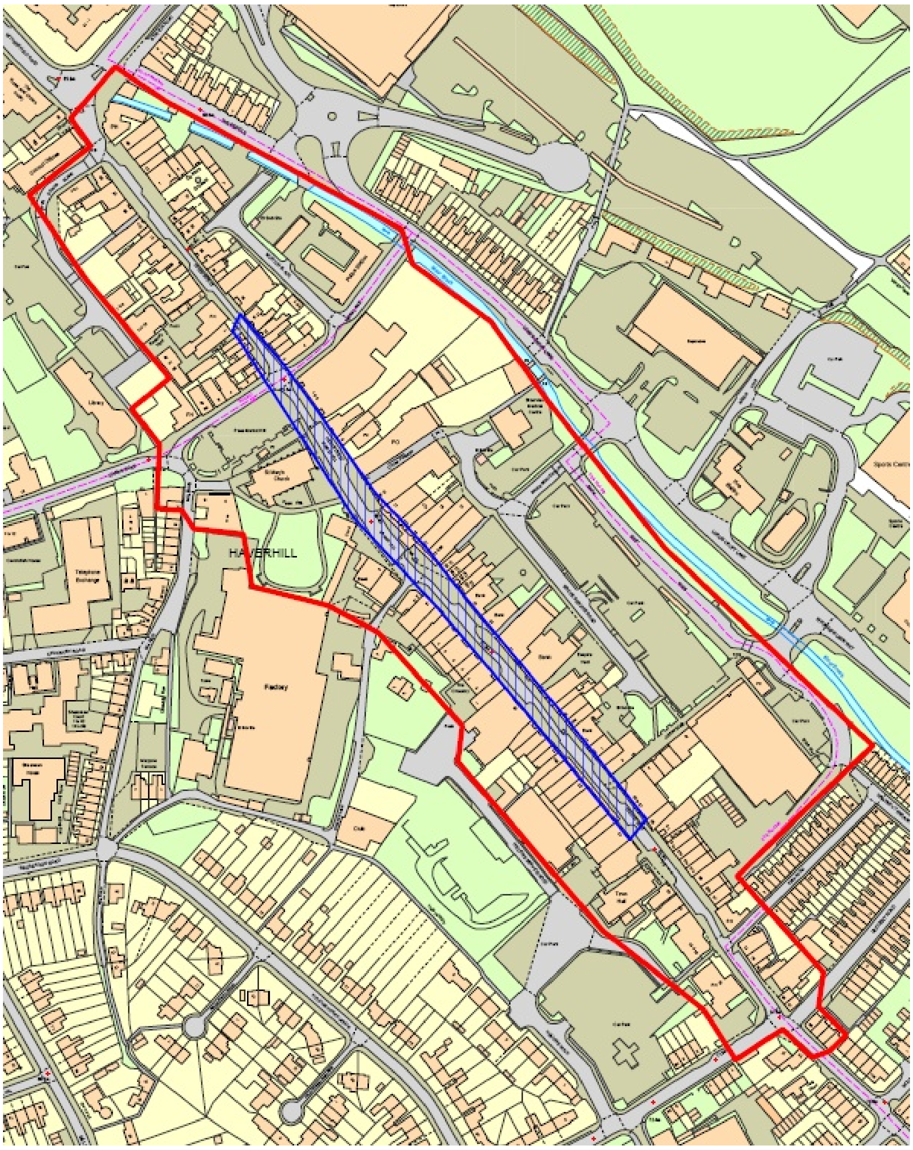
12.12 Unfortunately, Ehringhausen Way is heavily trafficked and therefore is somewhat of a deterrent to pedestrian movement from the new facilities to the town centre core area along Queen Street / Market Hill / High Street. This is particularly evident in the north of the town centre where the difference in levels between Queen Street and the new Tesco foodstore is most pronounced. Because of the levels difference, the most direct route from the new Tesco store to the High Street is via steps, and of crossing of a busy traffic junction, which is not a particularly attractive route for shoppers.

12.13 Because of the barrier effect of Ehringhausen Way, we believe that the commercial area to the east of Ehringhausen Way should be treated as being 'edge-of-centre' and not part of the primary shopping area – see below.

Primary Shopping Area Primary Shopping Frontages

12.14 The primary shopping area of Haverhill is linear in nature. We have defined a recommended primary shopping area for Haverhill, which basically includes the established shopping area extending from Queen Street in the north to the High Street / Duddery Road junction in the south. Within this area we have defined a primary shopping frontage running from the Queen Street / Camps Road junction to the High Street /Jubilee Walk junction.

12.15 The Plan below shows the recommended coverage of both designations (red line = primary shopping area / blue line with hatching = primary shopping frontage). A larger version of the Plan is provided in Appendix 10.



12.16 The primary shopping area falls into three parts, the core section of which is the section from the Queen Street / Camps Road junction to the High Street /Jubilee Walk junction forming the primary shopping frontages. This section contains the main convenience and comparison goods retailers within the primary shopping area.

12.17 The principal foodstore representation in the primary shopping area following the closure of the Coop foodstore in Jubilee Walk is the Iceland store on High Street. Additionally, there is an independent butcher (Cherrytree) and a Holland & Barrett located on the High Street.

12.18 The principal comparison goods multiple stores, e.g. Boots, WH Smith, and Argos are in this section of High Street. Clothing and footwear multiples include Peacocks, M & Co, Dorothy Perkins, Burton, and Clarks. One of the largest comparison units is Glasswells (carpets and soft furnishings).

12.19 The interview surveys have indicated a large loss of PCA residents' expenditure in the clothing and footwear sector. A noticeable absentee from the primary shopping area is Marks & Spencer, who can play an important role in this sector. Another absentee (in the household goods sector) often found in the smaller centres is Wilkinson.

12.20 The strategy must be to strengthen the primary shopping frontages. Although vacant premises are not particularly evident other than in Jubilee Walk, there is potential for this area to absorb greater shopping activity. The positive actions that the Council can take to achieve this are limited, however, as future investment will be largely dependent upon the market. The traffic calming measures that have been undertaken in High Street have provided a reasonably safe and attractive shopping environment in this area.

Queen Street

12.21 Although historically part of the core town centre area, Queen Street, has suffered from a diminution of shopper activity and has become a somewhat peripheral part of the primary shopping area. The street and adjacent Queen's Square is now dominated by service uses of a somewhat down-market nature – cafés, sandwich bars, betting offices, laundrette, etc. Although this part of the primary shopping area is the closest to the new Tesco store, it appears to be experiencing only limited benefits from this. We have referred above to the level changes and relatively poor links between the Tesco store and Queen Street.

12.22 Queen Street is pedestrianised and provides a safe shopper environment. Pedestrian flows are interrupted between Queen Street High Street by Swan Lane and Camps Road. Also any improvements to the links with the Tesco store would be of assistance (actual or visual) in improving connections with this part of the primary shopping area. A flexible approach towards uses within this area would be justified, as clearly its role as a retail location has become limited and market demand for representation in this area is poor.

High Street South

12.23 There are secondary frontages between the Jubilee Walk junction and the Duddery Road junction. These frontages should be protected for secondary retail and service uses, where independent traders and lower rental uses can become established. Such uses can make an important contribution to shopping centres.

12.24 The Arts Centre is an important destination in this part of the centre. There is potential to increase the provision of food and drink establishments within this part of the High Street to support the entertainment functions of the Arts Centre.

Edge of Centre

12.25 We have noted above that a key retail / commercial area in Haverhill town centre lies on the eastern side of the primary shopping area. This includes the new Tesco foodstore (3,227 sq m net), Aldi foodstore (697 sq m net), Cineworld, Leisure Centre, and restaurants. We have referred to the major positive impact that this has had on improving the retail, restaurant, leisure and entertainment offer in Haverhill.

Non Central

12.26 The principal non-central retail facilities in Havering are at Hanchett End, consisting of a Sainsbury foodstore (4,621 sq m net), B&Q and Halfords. The Sainsbury was predicted to experience major trade diversions following implementation of the Tesco foodstore and the interview surveys suggest that this has been the case. However, at the time of our visits the store has been well patronised and it is clearly plays an important role within the town's shopping hierarchy.

Expansion Areas

12.27 The growth strategy for Haverhill set out in Policy CS12 of the Core Strategy makes provision for two expansion areas in the town.

12.28 The first is the north-west Expansion Area (previously allocated in the Local Plan), which has the potential to deliver some 1,150 homes in the short term. This would generate a theoretical need for a minimum additional 709 sq m gross of retail floorspace (236 sq. m comparison and 473 sq. m convenience).

12.29 The second is a larger strategic greenfield site (the North-eastern Expansion Area), which is expected to deliver around 2,500 homes in the long term. This would generate a theoretical need for a minimum additional 1,425 sq m gross of retail floorspace (386 sq. m comparison and 1,040 sq. m convenience).

Other out-of-centre

12.30 Any proposals for 'out-of-centre' convenience (or comparison) retailing should be subject of the sequential approach and impact tests. A key issue in Haverhill is the loss of residents' expenditure to competing centres, particularly Cambridge. This is reflected in the low expenditure retention rates for certain goods categories, particularly clotting and footwear, household goods, and furniture and carpets. An important consideration in evaluating any proposals should be the ability to claw back trade, without adversely affecting the performance of retailing in the primary shopping area.

Leisure and Other Town Centre Uses

12.31 Haverhill is reasonably well catered for in terms of leisure provision for a town of its size. Major new commercial leisure and entertainment facilities have been provided off Ehringshausen Way (including a leisure centre, cinema and restaurants), which have improved the entertainment and leisure offer available to residents.

12.32 The primary shopping area would benefit from further investment in retail service uses (as well as retail uses). The difficulty, particularly in the current economic climate, is attracting these uses into this area.

12.33 No specific provision needs to be planned for in the town centre. However, mixed-use allocations, which include leisure uses, should be made within the Haverhill Vision 2031 AAP to allow for the delivery of new leisure provision as appropriate. Additional leisure provision of an appropriate scale should be provided within local centres as part of the proposed expansion areas. This will provide the opportunity for the future leisure needs of the new residents to be catered for.

Opportunities for New Development

12.34 As noted above, there will be limited demand for new retail development in Haverhill town centre, certainly in the first part of the plan-period. The emphasis should be on fostering new investment to the primary shopping areas, where there is potential to absorb new shopping activity, including the large unit Co-Op store, which is now vacant.

12.35 We have identified a number of sites which could be utilised to provide future opportunities to deliver retail and other town centre uses at Haverhill. These are:

(i) Jubilee Car Park, former Co-op and Bus Station;

(ii) Police Station and car parking, Swan Lane

(iii) Gurteens Site

(iv) Wisdom Toothbrushes Site

12.36 A schedule of the sites identified, with a map showing the extent and location of the sites, can be found at Appendix 11.

12.37 The former Co-Op premises / Jubilee Walk car parks / bus station should be the priority area within which to encourage new investment and development. It lies to the east of High Street, and includes large areas of car parking. Redevelopment of this site for retail and other town centre uses could make an important contribution to the vitality and viability of the town centre as a whole, as it is closely linked to the core shopping area of the primary shopping area, and its redevelopment could facilitate more effective links between the primary shopping area and the retail / leisure facilities to the east of Ehringhausen Way.

12.38 We understand the Council is the freehold owner of land in this area, which should provide a greater opportunity to bring forward the necessary change. The attraction of appropriate forms of new retail investment to this area could have a major positive impact on the town centre.

12.39 The Gurteens Chauntry Mills premises could provide an opportunity to deliver some additional retail and other appropriate town centre uses adjacent to the primary shopping area. Any redevelopment / refurbishment of the premises would need to respect the historic and listed building status of the premises.

12.40 There are servicing car parking areas to the rear of the Police Station at Swan Lane, which lie close to the primary shopping frontages of the town centre. In location terms this area would be suitable for new retail development / town centre uses with direct pedestrian links to the primary shopping frontages.

12.41 There are other sites that lie close to the town centre, that could be suitable for redevelopment, but their linkages with the primary shopping frontages are less good, making them less suitable for 'town centre' retail uses than the sites identified above. These include the Wisdom Toothbrushes site to the south west of the primary shopping area.

Centre Improvements

12.42 The following improvements within the town centre could be considered, which would be beneficial to the vitality and viability of the centre:

- In association with any redevelopment of the former Co-Op premises / Jubilee Walk car parks / bus station area, strengthening of the links across town centre from the existing core shopping area to the retail and leisure provision on the eastern side of Erhinghausen Way;
- Interview surveys have indicated a perception by some respondents of the town centre feeling unsafe in the evenings, due to anti-social behaviour, and poor lighting has been mentioned as a contributing factor. Consideration could be given to ways of overcoming this perception, such as improved lighting and/or CCTV; and
- Consideration of the scope for any further traffic restrictions in the town centre to enhance the pedestrian environment, alongside the need to maintain a feeling of activity in the centre.

13 Policy Recommendations

Core Strategy Policy CS10

13.1 Core Strategy Policy CS10 provides the current strategic policy framework for new retail, leisure cultural and office development within the Borough. None of the findings in this Study cause us to recommend reconsideration of the majority of the policy (to which we have referred in Section 4 of this report); namely maintaining Bury St Edmunds and Haverhill as the focus for new retail, leisure cultural and office development within the Borough, taking into account the issues specified in the policy; and focussing retail development elsewhere in the identified Key Service and Local Centres and in the new local centres in the areas for growth. Developments in these locations should be of an appropriate scale and character to the role and function of the centres.

13.2 We do, however, question the value of that part of the policy that specifies in quantitative tabular from the need for retail floorspace in Bury St Edmunds and Haverhill in 2011, 2016, and 2021. We have updated the quantitative need forecasts for both Bury St Edmunds and Haverhill, to account for changes since the earlier forecasts were made. We believe that the forecasts are of assistance in understanding the overall performance and potential of shopping centres. However, they are a broad brush guide only, and in our opinion the inclusion of precise floorspace thresholds as a part of a planning policy is potentially misleading.

13.3 The reasons for our concern is that retail floorspace forecasts are based on a number of uncertain variables, some of which can have very significant impacts on the assessment outputs. Key inputs and uncertainties that can affect assessment outputs are:

(i) Changing economic circumstances, disposable incomes and retail expenditure; the future performance of the national economy is subject of particular uncertainty at the present time;

(ii) Identification of actual levels of expenditure by residents in shopping centres is difficult, where interview surveys identify visits to a centre only: this is particularly the case where residents regularly use more than one centre;

(iii) Use of the internet for retail purchases is increasing significantly, but the relationship between internet shopping and the need for shop floorspace is complex. Some retailers including some foodstores service internet orders from the store sales areas (so having minimal impact on floorspace needs), others such as Amazon bypass the need for shop floorspace altogether;

(iv) Retailer turnover levels per unit of floorspace are enormously variable, both according to the type of retailer and the store location. This means that use of benchmark average turnover levels can only be a broad guide, and that undue reliance should not therefore be placed on figures of current 'latent' expenditure capacity based on average performance levels.

(v) Changes in the market share of expenditure attracted to a centre as a result of new investment (that cannot be anticipated) can have a major impact on the theoretical need for new floorspace.

13.4 Having regard to the above, we believe that any quantitative floorspace thresholds included in the Core Strategy are best expressed in the supporting text to shopping policies (rather than in the Policy itself). They can then be presented as guide only, with reference to the uncertainties attached to them and the need for monitoring.

Generic Policies

13.5 We believe that other shopping / town centre policies either in the Core Strategy, Action Area Plans (or their successor Local Plans) should seek to address the matters included in Sections 11 and 12 setting out our findings in respect of Bury St Edmunds and Haverhill. Based on these findings, we believe that shopping policies should focus on the following:

- § The hierarchy of shopping centres in the Borough (currently as in Policy CS10):
- § Maintaining Bury St Edmunds and Haverhill as the focus for new retail, leisure cultural and office development within the Borough (currently as in Policy CS10):
- § Identifying the role and function of the centres elsewhere - Key Service and Local Centres;
- § Identifying the role and function of shopping / service centres to serve the defined housing expansion areas;
- § Identifying the tests that must be satisfied by any proposals for new development in other 'non-central' locations';
  - – Sequential approach
  - – Impact – specifying the measures of impact that must be addressed

13.6 In respect of the impact test, PPS4 refers to a threshold floorspace size above which impact assessments are required. Having regard to the hierarchy of shopping centres within St Edmundsbury, we believe that a threshold floorspace size of 1,000 sq m gross throughout the District would be appropriate.

Bury St Edmunds and Haverhill Policies

13.7 In addition to the generic shopping policies that we have described above, we identify the following policies applicable to Bury St Edmunds and Haverhill as the principal town centres within the Borough.

- § Definition of primary shopping areas and primary shopping frontages

  Defined primary shopping area boundaries can be of use in providing a measure for assessing 'edge-of-centre' locations

  They can also be used to specify requirements of development proposals located within the frontages. However, careful consideration needs to be given to any requirements in respect of acceptable uses within the frontages; for example some restaurant / service uses can make a positive contribution to pedestrian activity and the attractiveness of the street to shoppers

- § Identification of any sites worthy of development plan allocations.

13.8 The above policy recommendations derive only from the work that we have carried out. They are not are not intended to exclude other policies that the Council may consider to be appropriate relating to town centre / retail issues.