Kirklees Retail and Leisure Study 2026

Final Report

ON BEHALF OF KIRKLEES METROPOLITAN COUNCIL

May 2026

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1. Introduction

Instruction and Purpose

1.1 Nexus Planning has been instructed by Kirklees District Council (hereafter referred to as 'the Council') to undertake a new Retail and Town Centre Uses Study. The primary focus of the Study is to establish the current position in respect of the need for additional retail and leisure facilities in the Kirklees authority area, and to consider the vitality and viability of Huddersfield, Holmfirth, Heckmondwike, Dewsbury, Batley and Cleckheaton town centres (the principal centres in the district).

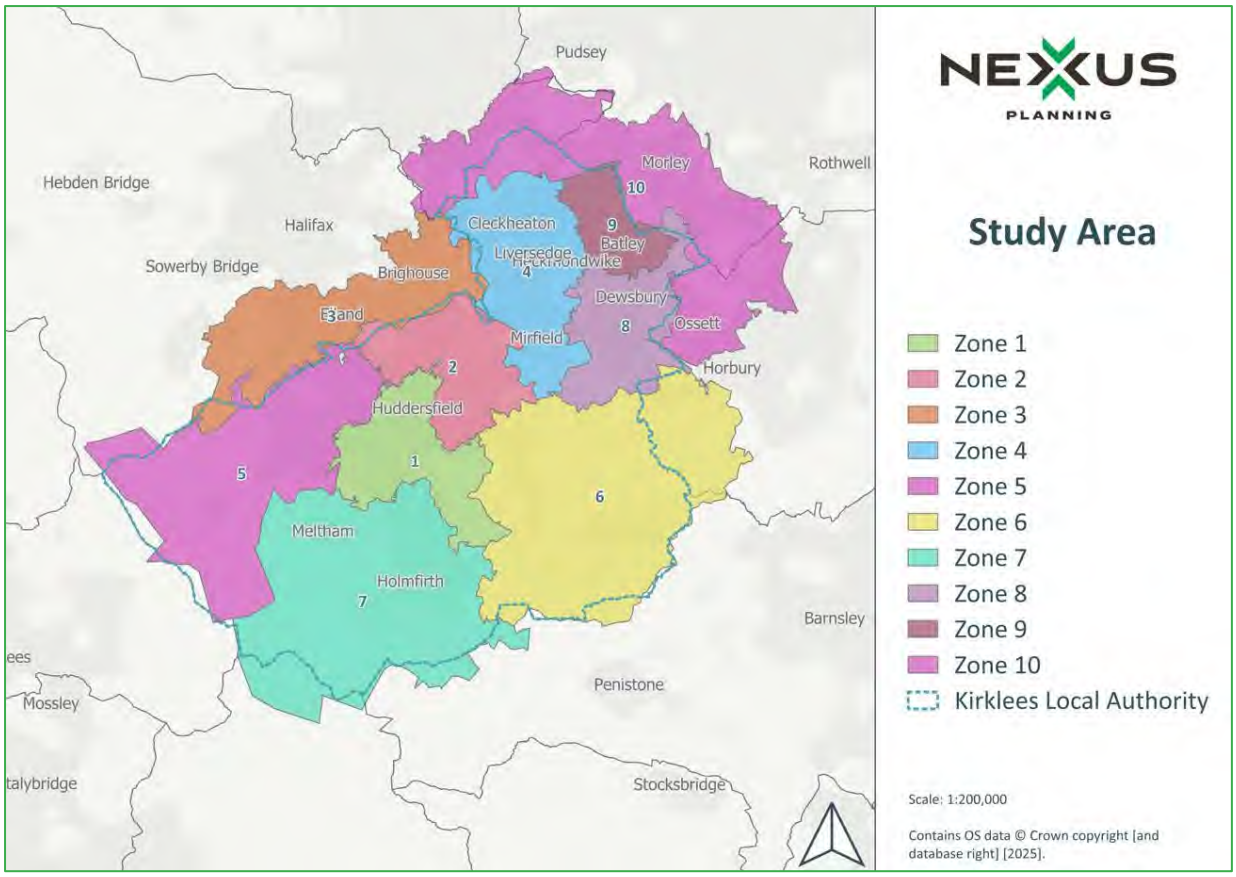
1.2 The Study replaces the previous Kirklees Retail Capacity Update, which was authored by WYG and which reported in August 2016.

1.3 The Study is underpinned by new empirical evidence in the form of a new household shopper survey, and our site visit to survey and assess the health of the defined centres.

1.4 The household survey was undertaken by NEMS Market Research in May 2025 and covers ten separate zones, which are collectively considered representative of the principal catchment area for retail facilities and leisure facilities located within the Kirklees authority area. The zones have been developed with regard to those utilised in the previous Study, which provides us with the opportunity to compare shopping and leisure patterns.

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

Figure 1.1: Study Area and Zones



1.6 Whilst the Study Area largely corresponds with the boundaries of the Kirklees authority area, it does include small parts of neighbouring authority areas, where residents sometimes look to facilities in Leeds city centre, along with the wider district, to meet at least some of their retail and leisure needs.

1.7 In this regard, it is important to recognise that shopping habits are not governed by local authority area boundaries. It is therefore appropriate to consider the 'inflow' of retail expenditure from residents of neighbouring authority areas to destinations in Kirklees in order to identify retailers' overall turnover and understand the role of centres and standalone stores across the wider area. The household survey also allows us to identify expenditure that originates within Kirklees but which 'leaks' to destinations outside of the authority area.

1.8 In producing the Study, we have also taken the draft NPPF published for consultation in December 2025. It is important that the Study takes account of the potential changes to national policy so as to provide defensible and relevant policy recommendations.

Structure of Report

1.9 Our report firstly provides an overview of prevailing retail and leisure trends, before then going on to consider the planning policy context for the updated Study. We then consider the vitality and viability of the town centres of Huddersfield, Dewsbury, Batley and Cleckheaton.

1.10 The remainder of the report identifies retail and leisure needs arising within the district to 2043. To undertake this assessment, we identify population and expenditure growth across the Study Area. The final sections of the report provide our conclusions in respect of retail and leisure needs and provide our planning policy recommendations.

1.11 Accordingly, this report is structured as follows:

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

2. Current and Emerging Retail and Leisure Trends

2.1 In order to provide a context for this Study and to help identify the sectors that are more likely to be the subject of additional development proposals, we set out a summary of current retail and leisure trends below. In reading the summary, it should be noted that the retail and leisure sectors are dynamic and, whilst online shopping and economic conditions have impacted on the high street, new retailers and formats continue to evolve to meet shoppers' needs.

2.2 The below commentary should therefore be taken as a 'snapshot' in respect of current market conditions; it will be necessary to judge future development proposals for main town centre uses with reference to the prevailing circumstances at the time of a proposal's determination. Whilst the impact of Covid-19 on the retail and leisure sectors has lessened in 2023 and 2024, the trading outlook remains challenging due to inflationary pressures and significant increases in the cost of living. We reflect further on the current economic outlook below.

Economic Conditions

2.3 The UK economy was impacted significantly by the Covid-19 pandemic in 2020 and 2021, and by restrictions on movement and behaviour which sought to mitigate its impact. This uncertain background caused retail and leisure expenditure (and business investment) to decline. Household spending fell by over 20% quarter-on-quarter in the second quarter of 2020 following the imposition of national lockdown measures. This is the largest quarterly contraction on record. Retail sales volumes also suffered double-digit falls in April 2020 as all but essential stores closed during the height of the lockdown.

2.4 However, following the gradual reopening of businesses over the summer of 2020, the economy returned to growth, with this gathering momentum as a greater number of sectors reopened, including hospitality and leisure services. A resurgence in the number of cases of Covid-19 then resulted in the Government reinstating a nationwide lockdown in early 2021. The general economic outlook in 2022 and 2023 has continued to be of concern given very significant increases in the rate of inflation and the general cost of living.

2.5 In March 2025, Experian published its Retail Planner Briefing Note 22 ('ERPBN22'), which identifies anticipated future growth in the retail and leisure sectors and considers likely changes in bricks and mortar retail floorspace and online sales.

2.6 ERPBN22 anticipates that retail spending has been squeezed in 2022 and 2023 as a consequence of inflationary pressure and increases in the cost of living. ERPBN22 provides the following summary of the economic outlook:

'Since our last publication, the UK economy rebounded from the mild technical recession endured in the second half of 2023, reporting robust growth in the first half of 2024, supported by a strong service sector. However, the economy broadly stalled in the second half of the year, underpinned by weakness in business and consumer confidence both before and after the Autumn Budget. Ahead of the fiscal announcement firms deployed a wait and see approach to investment decisions, while in recent months companies appear to be in cost cutting mode given an upcoming increase in employers' National Insurance Contributions (NICs), a rise in the National Minimum Wage, and a reduction in business rates relief in April.'

2.7 It is clear that the Covid-19 pandemic has accelerated the shift to online retailing with a consequent reduction in bricks and mortar retail floorspace. As a consequence, the proportion of expenditure committed via special forms of trading (i.e. internet and mail order sales) has increased.

2.8 More generally, as a result of relatively modest growth forecasts and the shift to online retailing, Experian forecasts that there will be a reduction in the stock of retail floorspace over the next few years.

2.9 In terms of inflation, Office for National Statistics data[1] indicates that the rate of inflation (as measured by the consumer price index) increased from 0.8% at April 2020 to 1.5% at April 2021, before then increasing significantly to 9.0% at April 2022. The rate of inflation appears to have peaked at 11.1% in October 2022 and has reduced significantly to 6.7% at August 2023 and to 2.6% as of September 2024. Retail has been an industry under significant stress, as many retailers find themselves squeezed between rising costs and the increasing volume of sales over the internet. Such difficulties have, of course, been exacerbated by the Covid-19 pandemic and the cost of living crisis associated with rising energy prices and inflation.

2.10 As consumer spending accounts for around 60% of GDP, the financial health of households and their willingness to spend are crucial factors in determining an economy's performance. Traditionally, consumer spending is the driving force behind GDP growth in the UK. In recent years, however, this has not been the case. First, the Covid-19 pandemic and associated lookdowns resulted in temporary large drops in spending and big changes to spending patterns (such as a greater share of spending on goods and less on services). Then, just as spending had recovered to its pre-pandemic level, the period of high inflation in 2022 and 2023 squeezed household budgets, resulting in stagnant spending in real (inflation-adjusted) terms.

2.11 Household incomes, on average across the country, have increased since 2023 mostly because wage growth has been higher than inflation. As of mid-2024 this hadn't led to a noticeable increase in consumer spending, but forecasters believe that spending growth will accelerate heading into 2025. The consensus forecast among economists surveyed in October was for consumer spending to rise by 0.7% in 2024 and by 1.3% in 2025.This seems largely due to the improvement in household incomes, with further gains anticipated in 2025. A further boost to spending could come from households saving less than they have in recent years. The proportion of income that households saved rose from 4.5% of total income in Q2 2022 to 10.0% in Q2 2024, a relatively high rate historically (excluding the pandemic).

2.12 In addition, consumer confidence has improved and hit a three-year high in July and August 2024. It did, however, fall in September 2024. It is likely that the new Labour government's warnings about the state of the economy and "difficult decisions" announced as part of the Budget might be factors behind the deterioration in confidence.

2.13 There will still be the need and demand for physical stores, despite the increase in shopping online. This is particularly the case for convenience goods sales given that online shopping orders are typically picked from the shelves of physical stores. In respect of comparison goods, there is a need for the offer to become more 'experiential' to encourage shoppers onto the high street, and to ensure that shopping is viewed as a pleasurable pastime. The shopping experience needs to evolve and diversify both to attract footfall and convert increased activity into sales. Independents clearly have an important role to play in adding interest and in providing differentiation between shopping venues.

Available Expenditure and the Impact of the Internet

2.14 Experian expenditure data and growth forecasts confirm that the pandemic has resulted in turbulent short term changes in per capita convenience and comparison goods expenditure.

2.15 In this regard, ERPBN22 identifies that per capita convenience goods expenditure decreased by -5.0% in 2022 with a further reduction of -3.5% in 2023. This follows a previous reduction of -1.3% in 2021. Before this, in 2020, per capita convenience goods expenditure increased by 6.8%. The strong level of growth at 2020 is largely attributable to consumers spending more on such goods as a result of lockdown measures. Limited annual per capita

[1] ONS 'Consumer price inflation tables' dataset, July 2023.

convenience expenditure growth (relative to that which has been achieved historically) is anticipated to return across the medium to long term.

2.16 As the below Table 2.1 shows, the position in respect of annual per capita comparison goods expenditure has been changeable in the past few years. Whilst annual per capita comparison goods growth of 6.8% was recorded in 2021, this followed a reduction of -8.3% in 2020. Forecast per capita comparison goods expenditure increases over the medium and longer term are positive but still below the level apparent at the turn of the millennium.

Table 2.1: Experian's Identified and Forecast UK Convenience and Comparison Goods Per Capita Expenditure Growth

Volume Growth per Head (%)	2019	2020	2021	2022	2023	2024	2025	2026	2027-31	2032-40
Convenience goods	-1.2	6.8	-1.3	-5.0	-3.5	-1.8	-0.8	-0.6	-0.3	-0.2
Comparison goods	2.9	-8.3	6.8	3.4	-3.2	-1.0	0.1	1.3	2.5	2.6

Source: Figure 1a and Figure 1b of Experian Retail Planner Briefing Note 22

2.17 Whilst the above figures identify a level of growth which is significantly below that which has historically been achieved, the situation for high street stores is exacerbated through the increasing amount of expenditure which is committed through special forms of trading[2] and, in particular, through online sales.

2.18 The below Table 2.2 sets out Experian's identified and forecast level of special forms of trading as a proportion of overall convenience and comparison goods expenditure. Experian estimates that special forms of trading will account for just under four out of every ten pounds spent on comparison goods and almost a quarter of convenience goods expenditure at 2040.

Table 2.2: Experian's Identified and Forecast Market Share of Non-Store Retail Sales for Convenience and Comparison Goods Sectors

Volume Growth Per Head (%)	2019	2020	2021	2022	2023	2024	2029	2034	2039	2040
Convenience goods	11.0	15.3	17.1	17.1	16.5	17.0	19.4	21.7	23.9	24.4
Comparison goods	22.0	35.6	34.8	32.0	30.9	31.6	34.1	36.3	38.6	39.0

Source: Figure 5 of Experian Retail Planner Briefing Note 22

2.19 The ongoing popularity of internet shopping continues to have clear implications in respect of the viability of some 'bricks and mortar' retailers. However, it is important to note that changes in how people shop also bring about some opportunities for retailers trading from the high street. In particular, many stores sell online but fulfil orders from regular stores rather than warehouses[3], with purchases therefore helping to sustain tangible retail floorspace. As a consequence, Experian also provides an 'adjusted' estimate of special forms of trading, which relates to expenditure which is not available to actual stores.

2.20 These figures are provided in Table 2.3 below. The figures demonstrate the high proportion of online sales which are fulfilled from physical stores, and therefore the importance of retaining this offer on our high streets.

[2] Including internet sales, mail order, stalls and markets, door-to-door and telephone sales.
[3] This is particularly the case with food shopping and speciality comparison goods purchases, where retailers often try to tap into a wider market through an online presence.

Table 2.3: Experian's Identified and Forecast Adjusted Market Share of Non-Store Retail Sales for Convenience and Comparison Goods Sectors

Volume Growth Per Head (%)	2019	2020	2021	2022	2023	2024	2029	2034	2039	2040
Convenience goods	3.3	4.6	5.1	5.1	5.0	5.1	5.8	6.5	7.2	7.3
Comparison goods	16.5	26.7	26.1	24.0	23.1	23.7	25.6	27.3	28.9	29.3

Source: Figure 5 of Experian Retail Planner Briefing Note 22

Convenience Goods

2.21 Recent socio-economic conditions have led to significant shifts in convenience goods retailing, which have resulted in the 'big four' supermarket operators' market share being cut. Indeed, analysis from Kantar[4] has identified that the traditional 'big four' supermarket operators are no longer such, with Aldi's market share overtaking that of Morrisons over the 12 weeks to 4 September 2022. Aldi continues to achieve a market share (10.0%) higher than Morrisons (8.7%) as of June 2024.[5]

2.22 Mintel[6] finds that the decline of the food superstore is well-established and can be attributed to two matters as follows:

- Firstly, people are undertaking food shopping in different ways. More people are living in town and city centres and are generally purchasing their own home at a later age than was previously the case.[7] Mintel indicates that such people are more likely to undertake food shopping on an 'as needs' basis and are more likely to eat out or use takeaways. As such, they are less likely to have need to undertake a weekly 'main food shop'.
- Secondly, the current uncertainty in the economy has made discount foodstore operators (namely Aldi and Lidl) a more attractive proposition, and many such foodstores are thriving given that shoppers are currently having to be 'money savvy'. Discounters have also made efforts to try to compete more directly with the 'big four' supermarket operators, with larger stores, greater ranges of goods, fresh foods, and premium products becoming increasingly prevalent. It is evident that the likes of Aldi and Lidl are no longer 'hard discounters' in quite the same way they once were, as they now fulfil a wider range of customers' needs by offering a greater range of products. The move towards the middle ground has allowed discounters to secure market share from both superstores and smaller convenience stores. In addition, we note that discount retailers are often happy to trade alongside more upmarket convenience goods retailers (such as M&S Foodhall) as, collectively, the two stores can meet a comprehensive range of grocery shopping needs.

2.23 The shifts in the sector are illustrated with reference to changes in retailers' market share in recent years, as shown in Table 2.4.

2.24 The past few years have seen the closure of a number of unprofitable grocery stores (from small convenience stores to large superstores) and the continuation of Aldi and Lidl's expansion programme. Aldi announced in September 2023 that it intends to open another 500 stores in the coming years.[8] Lidl intends to open a further 250 stores across the UK.[9]

[4] An international market research company based in London.
[5] Kantar, Great Britain Grocery Market Share (12 Weeks Ending), 9 June 2024.
[6] 'UK Retail Rankings', Mintel (a market research company), April 2018.
[7] Article headlined 'Average UK first-time buyer is now older than 30, says Halifax', The Guardian, January 2022.
[8] Article headlined 'Aldi claims it is increasingly shoppers' main supermarket for weekly shop', The Guardian, 8 September 2023.
[9] As set out in the press release headlined 'Lidl continues to search to secure sites for new stores', 24 April 2023 (https://corporate.lidl.co.uk/media-centre/pressreleases/2023/lidl-continues-search-to-secure-sites-for-new-stores).

2.25 Whilst the traditional 'big four' remain more cautious in respect of new openings, a limited number of proposals for mid-sized foodstores are currently being promoted by these operators in areas where there is a growing population, or an obvious shortfall in existing provision. These stores are often of a scale that is broadly comparable to that provided by Aldi and Lidl, which allows customers to shop in a convenient and efficient manner.

Table 2.4: Market Share of Convenience Goods Operators

Operator	December 2017	December 2018	December 2019	December 2020	December 2021	December 2022	December 2023	December 2024
Tesco	28.1%	27.8%	27.4%	27.3%	27.9%	27.5%	27.6%	28.1%
Sainsbury's	16.5%	16.1%	16.0%	15.9%	15.7%	15.5%	15.8%	15.9%
Asda	15.3%	15.2%	14.8%	14.3%	14.2%	14.0%	13.6%	12.3%
Morrisons	10.8%	10.6%	10.3%	10.4%	10.1%	9.1%	8.8%	8.6%
Aldi	6.8%	7.4%	7.8%	7.4%	7.7%	9.1%	9.3%	10.3%
Co-op	5.8%	5.9%	6.1%	6.0%	5.8%	5.6%	5.4%	5.5%
Lidl	5.0%	5.3%	5.9%	6.1%	6.3%	7.2%	7.7%	7.7%
Waitrose	5.2%	5.0%	5.0%	5.0%	5.1%	4.7%	4.6%	4.4%
Iceland	2.2%	2.2%	2.3%	2.5%	2.4%	2.5%	2.4%	2.2%
Symbols & Independent	1.7%	1.5%	1.6%	1.7%	1.6%	1.4%	1.4%	1.4%
Other Outlets	1.6%	1.7%	1.6%	1.8%	1.8%	1.8%	1.8%	1.8%
Ocado	1.1%	1.2%	1.3%	1.6%	1.7%	1.7%	1.7%	1.8%

Source: KANTAR Grocery Market Share. Figures shown are for the final reporting period in each calendar year
A symbol group is a form of franchise of convenience shops, found primarily in the United Kingdom and Ireland.

Comparison Goods

2.26 The comparison goods sector is currently being squeezed by a number of factors, including increasing operator costs and a reduction in discretionary spending as a result of increases in the cost of living.

2.27 Whilst the sector is continually evolving and there are a number of retailers performing well (including JD Sports, Next, Primark, and Zara), recent headlines have focused on failing retailers and store closures. High profile retailers that have struggled include Debenhams, which announced the closure of all 124 stores in December 2020, and the Arcadia Group, which owned Topshop, Topman and Dorothy Perkins. Arcadia Group announced the closure of around 500 stores in February 2021.[10] Furthermore, Intu Properties, one of Britain's biggest shopping centre owners, fell into administration in June 2020 after failing to secure an agreement with its creditors.[11]

2.28 More recently, Wilko entered into administration in August 2023 and ceased trading shortly after, and The Body Shop announced the closure of 75 stores at the end of February 2024, after falling into administration. More recently, WHSmith announced the closure of some of their stores in March 2025 prior to closing all of its high street stores later in the year and Homebase closed a number of stores throughout 2024.

2.29 Whilst the loss of some of the above names will have significant repercussions for certain towns (particularly those that have lost one or more of Debenhams, Marks & Spencer, or House of Fraser from their high street), some well-known retailers have failed to 'move with the times' and update their offer, accommodation, and online presence.

[10] Article headlined 'After Topshop owner Arcadia's demise, what now for UK clothes shopping?' The Guardian, 13 February 2021.
[11] Article headlined 'Shopping centre owner Intu collapses into administration', The Guardian, 26 June 2020.

This is partly a consequence of retailers struggling to reinvest in their business when margins are tight (or non-existent).

2.30 Many operators have also rationalised their portfolio with the aim of serving the UK by concentrating on larger centres, supplemented by a strong online presence. It will be interesting to see whether any permanent change in respect of working from home may act to counterbalance this 'polarisation' trend, given the prospect of fewer commuters travelling to larger centres and greater numbers of people spending the working day in and around their home. The impact on larger centres may be to reduce footfall, particularly within the week, and result in the shift in expenditure being directed to the smaller town, district, and local centres. Whilst this will be a positive for the smaller centres, larger centres may suffer as a result.

2.31 Whilst structural changes have had a material impact on the vitality and viability of many UK high streets, there are some beneficiaries. Notwithstanding Wilko's recent problems, some 'discount variety' operators – such as B&M Bargains, Home Bargains and Poundland – have taken advantage of lower rents and reoccupied a number of medium to large retail units. However, as evidenced by recent events, including the closure of Wilko, the discount variety market may be approaching capacity. As we go on to explore in more detail below, the ongoing competition of out of centre destinations for national multiple representation is continuing to have impacts on the performance of some high streets

Leisure and Food & Drink

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

2.33 More generally, the food and drink sector was buoyed pre-pandemic by the success of mid-market national multiples, which expanded quickly across the UK. However, this market has become saturated in many locations and a number of high-profile operators have been in financial difficulty, including the closure of Byron Burger, Chiquito, and Frankie & Benny's branches. Given the problems suffered by such operators, the market has become more cautious and mid-market operators are picking new sites carefully as a result. Instead, we have seen a number of independent operators flourish, both before and throughout the pandemic, and a desire from customers to choose local operators over larger regional and national brands.

2.34 A further significant recent high street success story has been the resurgence of the town centre leisure sector, which has resulted in new cinemas being developed close to the shopping core and the emergence of 'competitive socialising' concepts, which include bowling, crazy golf, table tennis, darts, axe-throwing, escape rooms and other seemingly niche pursuits.

2.35 Cinema openings have been on the up in the early part of this century (until the Covid-19 pandemic) and 'boutique' cinema operators – including Curzon, Everyman, and The Light – are able to operate from smaller sites in town centres (partly as a consequence of digital technology). Town centre cinema development has successfully underpinned wider mixed-use developments, as food and drink operators are typically keen to locate in close proximity to benefit from spin-off custom. New, innovative leisure operators have been particularly beneficial both in re-using existing difficult-to-let premises, and in driving the evening economy.

2.36 More generally, the gym market continues to perform well, with there now being around 7,200 health and fitness clubs across the UK, which are estimated to have a total turnover of approximately £2bn.[12] Around one in every

[12] 'Number of health clubs in Europe in 2020, by country' dataset, Statistica, 27 October 2022.

seven Britons has a gym membership. Budget gyms are currently particularly popular, with operators such as Pure Gym, The Gym Group, and easyGym utilising a format that is based on low costs and high volume.

The Night-Time Economy

2.37 The term night-time economy is used to describe a wide range of activities that (typically) take place after 5pm. This could range from a trip to the theatre or cinema, to a family meal, to a night out at a club. A successful night-time economy generally caters for a wide range of demographics and interests.

2.38 Creating a safe, vibrant and well-balanced evening and night-time offer is a challenge that can dramatically improve the overall health of a town centre and boost the economy.

2.39 The Association of Town and City Management ('ATCM') has identified a number of themes to help improve the attraction and operation of the night-time economy, which are summarised as follows:

- **Alive After Five** – This relates to revisions to trading hours to better suit customers' shopping needs and availability. A Retail Trading Hours Study commissioned by ATCM found that sales between 5 pm and 8 pm are typically 50% greater than those between 9 am and 11am. Revising trading hours to open and close later could increase sales by around 10% to 12%.
- **Late Night Transport** – The lack of frequent, efficient and safe public transport late at night, or at least the perception of this being the case, could be having a detrimental effect on night-time economy and social scene. One way of increasing night-time visitor numbers is to promote late-night travel provision and its publicity.
- **Purple Flag** – This is an accreditation scheme which recognises excellence in the management of town and city centres at night. Obtaining Purple Flag accreditation demonstrates that a town's night-time economy offers clean and safe environments, great bars and clubs, a variety of arts and cultural attractions, and excellent transport links.
- **Evening Economy Ambassadors** – The ambassadors improve the evening and night-time experience in a town centre by liaising between visitors, police, door staff, licensees, and transport operators.
- **Light Night** – This is an initiative where town or city centres stay open after dark for people to enjoy local shops and services within a wider cultural event involving music, art and, most importantly, through the lighting up of buildings and light-based art installations.

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

Planning Reform on the High Street

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

2.42 Furthermore, in March 2021, an update was made to the General Permitted Development) (England) Order 2015. This allows for the change of use from Class E properties to residential from August 2021 (extending a right that had previously been restricted to office uses). This permitted development right is subject to maximum size requirements, the property having been in use as Class E for two years and having been vacant for three months.

An application to the determining authority for 'prior approval' is also required for limited consideration of impacts relating to transport, contamination, flood risk, noise, light, and neighbouring amenity. Further limitations apply in Conservation Areas and for nurseries, as well as in areas covered by 'Article 4 directions' where permitted development rights are extinguished.

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

2.44 The changes in the application of Article 4 directions were first put forward in the January 2021 consultation for draft revisions to the NPPF. However, the actual policy provision differs from the initial consultation in a couple of key areas. Paragraph 53 of the previous NPPF of July 2021 recognised that the loss of the 'essential core of a primary shopping area' could result in wholly unacceptable adverse impacts on an area's vitality and viability. This was the Government's first acknowledgement of the potential for the permitted development rights to undermine the health of centres in the NPPF. The updated text also introduced a requirement for 'robust evidence' to support the removal of development rights. The most recent iteration of the NPPF, published in February 2025, retains these changes.

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

Out-of-Centre Retailing

2.46 Another key format of retailing (and provision of leisure uses) are out-of-centre retail warehouse destinations. Whilst local authorities need to retain control over out-of-centre provision from a planning perspective, such provision does play an important part in providing space for operators who may not be able to viably trade from in-centre locations. Such uses include 'bulky' retail operators, including DIY stores, electrical goods retailers, furniture stores and so on.

2.47 In their UK Retail Warehousing April 2025 Spotlight Report, Savills note that: **'…despite the failure of two of the sector's longest-running operators, it is important to point out that at no point did national vacancy climb above 5%. The level of interest and speed at which the best vacant Carpetright and Homebase units were acquired is tantamount to the strong competitive tension that still exists in the market.'** In terms of the nature of the operators, it is the value orientated brands which continue to top the charts of the most acquisitive retail and leisure operators.

2.48 In this regard, Savills note that the retailers with a focus on essential product categories have continued to drive footfall to out-of-centre schemes, which remain at near parity with the levels seen pre-Covid. Furthermore, operators which focus on essential products have dominated the new openings, including Aldi and Lidl, Home Bargains, B&M Retail and leisure operators such as PureGym, Greggs and Starbucks. Indeed, the Savills' Spotlight Report notes that:

'…as we have seen in the past, when consumers swing into belt-tightening mode, large parts of the retail warehouse market stand to benefit. As we explored in the previous issue of this Spotlight, the out-of-town market is less dependent on big-ticket discretionary spend and increasingly focused on essential and value-based retail, especially with the growth of discount variety retailers and value-oriented grocers.'

2.49 In addition to the above, most out-of-centre shopping locations retain their apparent significant competitive advantages over town centres and high streets in terms of their supply of larger format modern outlets, their lower occupancy costs, extensive free parking and easy and convenient access to the surrounding highways and

key arterial routes. This is still an attractive proposition for those retailers that are still seeking space in the current market, but the implications of the attraction of out-of-centre facilities on defined centres, needs to be monitored carefully and the ongoing ease of access, parking and overarching attraction of out-of-centre facilities can of course have implications for town centre operators and retail and leisure planning policy.

Implications for the Kirklees Authority Area

2.50 The above trends have a number of potential implications for retail and leisure provision within Kirklees. Whilst Huddersfield and Dewsbury are the principal retail and leisure centres within the Study Area, out of centre destinations also accommodate a wide range of retail and leisure operators. Both types of destinations are susceptible to structural changes in the retail marketplace and the propensity of shoppers to buy increasing amounts of comparison goods online.

2.51 Given the above, it is important that there is more emphasis on a wider range of uses within the defined centres in Kirklees, which seeks to encourage visitors in, and to lengthen their 'dwell time'. The strategy here therefore will be to plan for the future mixed-use offer of the defined centres, encourage flexibility in the types of uses in the centres (whilst making sure they still provide for the day-to-day offer needed by local residents). Such uses will include leisure, workspace, cultural, residential, services and wider hybrid operations, which will build on the shift in shopping patterns and help to diversify centres and encouraging footfall.

2.52 As we go on to explore in more detail later in this Study, it is evident that the town centres within Kirklees benefit (to varying degrees) from the presence of anchor convenience goods retailers within or around their boundaries. Kirklees' grocery market is relatively self-contained, with the proportion of shopping trips and convenience expenditure attracted to destinations within the authority area being high and with good retention rates on the whole. The Study goes on to identify a degree of overtrading in some of Kirklees' major foodstores, indicating that there is perhaps a qualitative demand to further this convenience provision and increase consumer choice.

2.53 Whilst the growth of online retailing is likely to have had a detrimental impact on the turnover of Kirklees' centres, going forward, there may be opportunities for retail facilities to benefit from multi-channel retailing in order to help drive footfall and sustain retailer representation. It will be important to adopt a holistic approach to place management in order to ensure that centres support an experiential offer and are able to attract visitors to linger throughout the day and into the evening. There is a need for increased flexibility in centres, which need to be adaptable in order to address changing needs.

2.54 In this regard, out of centre destinations will continue to have the potential to draw trade from the defined centres, and particularly those which provide for a more diverse comparison offer including selling clothing and footwear. As such, continuing to encourage comparison retailing into the defined centres and particularly the principal larger defined centres will be key to encouraging footfall and expenditure, and policies which seek to protect the defined centres from out of centre development are fundamental to realising this.

2.55 Given the above, it is important that there is more emphasis on a wider range of uses within the defined centres in Kirklees, which seeks to encourage visitors in, and to lengthen their 'dwell time'. This is an aspiration which is clearly shared by the Council through their current regeneration initiatives and future aspirations for the centres within the authority area. Future alternative uses will also need to include residential development to meet the needs of the local catchments and communities and which will also in turn help to support the future vitality of the centres.

2.56 In this regard, Huddersfield town centre contains a number of opportunity sites that have the potential to contribute meaningfully to its regeneration and long-term vitality. In recent years, Kirklees Council has taken a more proactive role in reshaping the town centre through its Huddersfield Blueprint, which is a ten-year vision for

the town focused on the regeneration of key areas and the improvement of public spaces, transport, and the cultural offer.

2.57 One of the most significant opportunity areas is the Piazza Shopping Centre, which is now under Council ownership. Plans have been approved for its demolition, to make way for a new Cultural Heart that will include a refurbished Queensgate Market, a new museum and art gallery, a live music venue, and new public open space. This development represents a major transformation for the town and is expected to attract more footfall while enhancing Huddersfield's cultural identity. This clear diversification of the centre ensures that its future vitality and viability will be enhanced, and the Council's clear pragmatic aspirations for the centre will ensure it meets the needs and requirements of its catchment and visitors in the future.

2.58 A similar proactive approach has also been adopted for other centres within the authority area, including Dewsbury and Cleckheaton town centres, demonstrating again the acknowledgement that centres need to evolve to not only meet the traditional retail, leisure and service needs of their catchments, but to attract footfall and expenditure through other means too. Providing a flexible policy framework to enable this to continue to happen in the authority area will therefore be key in the new local plan.

3. Planning Policy Context

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

National Planning Policy Framework

3.2 The most recent iteration of the National Planning Policy Framework ('NPPF') was published in December 2024. The NPPF reflects the fact that the traditional role of town centres has been somewhat undermined by structural changes in the retail sector, and that there may be a need to plan for a more diverse range of uses going forward. As such, the NPPF advocates a more flexible policy framework to support the future vitality and viability of town centres.

3.3 NPPF policies are considered on a thematic basis below.

Plan-Making

3.4 Paragraph 20 of the NPPF indicates that development plans should set out an overall strategy for the pattern, scale and design quality of development, including policies to deliver retail, leisure and other commercial development. Paragraph 32 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be proportionate and take into account relevant market signals.

Building a Strong, Competitive Economy

3.5 Paragraph 85 of the NPPF indicates that planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Ensuring the Vitality of Town Centres

3.6 Chapter 7 is titled 'Ensuring the vitality of town centres' which highlights the national objective to protect and enhance town centre vitality. Furthermore, paragraph 90 specifically relates to planning for town centres. It states that:

'Planning policies should:

1. **define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;**
2. **define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;**
3. **retain and enhance existing markets and, where appropriate, re-introduce or create new ones;**
4. **allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;**
5. **where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies**

should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and

6. **recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.**

3.7 The requirement to plan to meet needs across a minimum ten-year period is a fairly new requirement (pre-December 2023), with earlier versions of the NPPF requiring town centre needs to be met in full across the entire plan period.

3.8 Paragraph 94 of the NPPF states that it is appropriate to identify local thresholds for the scale of edge of centre and out of centre retail and leisure development that should be the subject of an impact assessment. Any such threshold policy applies only to the impact test. All planning applications for main town centre uses that are not in an existing centre and not in accordance with an up-to-date development plan will generally be the subject of the sequential test.

Promoting Healthy and Safe Communities

3.9 Paragraph 96 seeks to support the social, recreational, and cultural facilities and services communities need. The guidance states that planning policies and decisions should:

1. Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;

2. Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas; and

3. Enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

Ensuring the Vitality of Town Centres Planning Practice Guidance

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

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

- The realistic role, function and hierarchy of town centres over the plan period. Given the uncertainty in forecasting long-term retail trends and consumer behaviour, this assessment may need to focus on a limited period (such as the next five years) but will also need to take the lifetime of the plan into account and be regularly reviewed.

- The vision for the future of each town centre, including the most appropriate mix of uses to enhance overall vitality and viability.
- The ability of the town centre to accommodate the scale of assessed need for main town centre uses, and associated need for expansion, consolidation, restructuring or to enable new development or the redevelopment of under-utilised space.
- How existing land can be used more effectively – for example, the scope to group particular uses such as retail, restaurant and leisure activities into hubs or for converting airspace above shops.
- Opportunities for improvements to the accessibility and wider quality of town centre locations, including improvements to transport links in and around town centres, and enhancement of the public realm.
- What complementary strategies are necessary or appropriate to enhance the town centre and help deliver the vision for its future, and how these can be planned and delivered. For example, this may include consideration of how parking charges and enforcement can be made proportionate.
- The role that different stakeholders can play in delivering the vision. If appropriate, it can help establish the level of cross-boundary/strategic working or information sharing required between both public and private sector groups.
- Appropriate policies to address environmental issues facing town centres, including opportunities to conserve and enhance the historic environment.

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

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

Use Classes Order

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

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

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

- **Use Class E** – Commercial, business and service uses include: shops or retail; cafes or restaurants; financial services; professional services; any service appropriate to provide in a commercial, business or service locality; indoor sports, recreation or fitness; medical or health services; crèche, day nursery or day centre; and, offices.
- **Use Class F1** – Learning and non-residential institutions include any non-residential use for the: provision of education; display of works of art; museum; public library or public reading room; public hall or exhibition hall; for or in connection with public worship or religious instruction; or, as a law court.
- **Use Class F2** – Local community uses include: a shop selling mostly essential goods, including food, no larger than 280 sq.m and where there is no other such facility within 1,000 metres radius of the shop's location. A

hall or meeting place for the local community, an area or place for outdoor sport or recreation and an indoor or outdoor swimming pool or skating rink.

- **Sui Generis** – Use within this Class now include a public house, wine bar or drinking establishment; a drinking establishment with expanded food provision; a hot food takeaway for the sale of hot food where consumption of that food is mostly undertaken off the premises; live music venue; cinema; concert hall; bingo hall; or, dance hall.

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

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

Town Centre Use Permitted Development Rights

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

Draft NPPF (December 2025)

3.20 The Draft NPPF was published for consultation in December 2025. Like the remainder of the Draft NPPF, the 'Ensuring the vitality of town centres' chapter in the NPPF is proposed to be split into two parts: one plan-making policy (TC1) and three development management policies (TC2/3/4). There is also an over-arching statement prior to the two sets of policies:

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

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

A. 'Be informed by a strategy for town centres in the area, to ensure that the full range of potential needs and opportunities for development is considered, including the scope to accommodate additional floorspace, to broaden the mix of uses (including residential uses) and to bring vacant sites and premises back into use;

B. Set out the hierarchy of centres, and any areas within them where specific policies on the nature and scale of development apply, including:

i. the extent of town centres;

ii. areas particularly suitable for a greater diversity and/or intensification of use, including through residential development; and

iii. areas within which infrastructure and public realm improvements are proposed.

C. Allocate a range of suitable sites in town centres to meet the scale and type of main town centre uses needed over the plan period in these locations, as well as for any complementary uses. Before reviewing town centre boundaries to accommodate any increase in development which is needed, existing vacant town centre sites and areas that are particularly suitable for intensification should be considered to maximise effective use of land;

D. Where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should set out proposals for identified needs to be met in other accessible locations that are well connected to the town centre; and

E. Where appropriate, set a locally defined floorspace threshold for development proposals outside town centres, above which an impact assessment would be required, as set out in policy TC4.'

3.22 There are three proposed development management policies which deal with town centres and the management of proposals for main town centres uses outside of town centres. There is now proposed to be a specific stand-alone national policy: TC2. It is directed specifically at proposals located within town centres, with the singular aim of supporting the overall vitality and viability of the centre.

3.23 Policy TC3 is intended to deal with the sequential test. It is proposed to retain all the hallmarks of the existing town centre first approach (in paragraphs 91 and 92 of the current NPPF). Part (1) of Policy TC3 in the draft NPPF states:

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

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

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

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

b. Town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).'

Local Planning Policy Context

Adopted Development Plan

3.25 The Kirklees Local Plan was adopted in February 2019 and sets out the spatial vision and strategic policies for the district for the period up to 2031. The Plan forms the statutory development plan and provides a clear framework for guiding retail, town centre, and commercial development across the District. Its town centre policies aim to maintain and enhance the vitality and viability of designated centres, ensure appropriate retail growth, and support the role of key town centres in serving the community.

3.26 There is also one 'made' Neighbourhood Plans that forms part of the development plan for Kirklees, being the Holme Valley Neighbourhood Development Plan 2021-2031, which was made in December 2021, and which includes policies for Holmfirth town centre.

Kirklees Local Plan 2013-2031

3.27 With regard to supporting the town centre and retail centres, the Local Plan proposes to continue to protect the town centres in order to ensure its vitality and viability and support priorities for that area. The Local Plan seeks to ensure that the hierarchy of retail and commercial centres are maintained and that their role, function, vitality and viability are maintained and enhanced in the future and, where possible, centres adapt to changing behaviours. Local centres are identified to ensure that communities outside of the main town centres have access to services and facilities that meet daily needs to reduce the need to travel.

Retail and Town Centres

3.28 Policy LP13 'Town Centre Uses' states that within Kirklees, main town centre uses should be located within defined centres, which comprise Principal Town Centres, Town Centres, District Centres and Local Centres, as shown on the Policies and Town Centre Maps. Proposals will be supported where they are appropriate in scale, help to retain an existing centre's market share, and enhance the experience of those visiting the centre and the businesses which operate there. Proposals which would have a significant adverse impact on the vitality and viability of a centre, or compromise its role and function, will not be supported.

3.29 Centres are expected to provide a mix of uses to serve the local community, businesses and visitors. These uses should complement one another whilst retaining a strong retail core, and should aim to support both the daytime and evening economy. The creation of new Local Centres will be supported in areas of significant residential growth or where deficiencies exist in the existing network, where it can be demonstrated that existing centres cannot be expanded. Such proposals will be subject to the sequential test and, where relevant, an impact assessment.

3.30 All proposals should be inclusive for all users and be attractive to pedestrians, cyclists and public transport users. They should also conserve and enhance local character, heritage, green spaces and the public realm where appropriate.

3.31 The policy defines the Shopping Centre Hierarchy as follows:

- Principal Town Centres: Huddersfield and Dewsbury
- Town Centres: Batley, Cleckheaton, Holmfirth and Heckmondwike
- District Centres: Almondbury, Birstall, Denby Dale, Honley, Kirkburton, Lindley, Marsden, Marsh, Meltham, Milnsbridge, Mirfield, Moldgreen, Ravensthorpe, Skelmanthorpe and Slaithwaite
- Local Centres: 61 centres as set out in the Local Plan Allocations and Designations document

3.32 The role and function of each tier is set out below:

- Principal Town Centres: provide for district-wide shopping needs (particularly comparison goods) and act as the main focus for financial and professional services, offices, entertainment, sport, leisure, culture and tourism, further and higher education, and health services.
- Town Centres: provide mainly convenience shopping for residents across Kirklees and focus on local financial services, offices, leisure, culture, tourism, further education and health services.
- District Centres: provide everyday shopping and serve specialist markets, and act as the local focus for food and drink, basic financial services, leisure, tourism and health services.
- Local Centres: provide for top-up shopping and local services, particularly food and drink.

3.33 The policy requires that proposals outside defined centres are subject to the sequential test. For retail proposals this applies to the Primary Shopping Area; for other town centre uses it applies to the full centre boundary. The

sequential approach requires proposals to be located first in-centre, then edge-of-centre, and only in out-of-centre locations where no suitable sites exist. Offices and small-scale proposals in non-urban areas are exempt where the proposal is 150 sq.m or less. The scope of the sequential test should be agreed with the Council and proportionate to the scale and function of the proposal. Proposals which fail the sequential test will not be supported.

3.34 An Impact Assessment will be required for proposals outside defined centres where:

- the proposal provides a floorspace greater than 500 sq.m gross;
- the proposal is within 800 metres of a Town or District Centre boundary and exceeds 300 sq.m gross; or
- the proposal is within 800 metres of a Local Centre boundary and exceeds 200 sq.m gross.

3.35 The scope of the impact assessment should be agreed with the Council and proportionate to the scale, role and function of the proposal. Proposals which would have a significant adverse impact on surrounding centres will not be supported.

3.36 Policy LP14 'Shopping Frontages' states that within Principal and Town Centres, Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontages have been defined to ensure a strong retail core is maintained and that main town centre uses are focused within appropriate areas.

3.37 The Primary Shopping Area represents the retail core of each town centre. In District Centres, this equates to the full extent of the defined centre boundary. Within these areas, active ground floor uses will be expected, and retail uses will be supported to maintain vitality and viability.

3.38 The policy confirms that the Primary Shopping Frontages, located within the Primary Shopping Areas of Principal and Town Centres, are those frontages characterised by predominantly retail uses. Retail will remain the predominant use in these locations. Other main town centre uses may be acceptable where the frontage continues to be predominantly retail, taking account of:

- the number, proximity and distribution of non-retail uses, and the level and duration of vacancies;
- the location and prominence of the unit within the frontage;
- the nature of the proposed use, including its level of activity, hours of operation, whether a shopfront would be incorporated, and whether it would complement neighbouring uses; and
- whether the proposal would retain, enhance or replace shopfronts to improve design and layout.

3.39 The policy also identifies Secondary Shopping Frontages, which are located within and adjacent to the Primary Shopping Areas of Principal and Town Centres and are characterised by a mix of retail and other main town centre uses. Proposals in Secondary Shopping Frontages will be supported provided that:

- they do not result in a dominance of non-retail uses that would undermine the retail core and function of the Primary Shopping Area;
- the proposed use would generate an appropriate level of activity, operate suitable hours, and include a shopfront that complements neighbouring uses; and
- proposals for changes of use would retain, enhance or replace shopfronts to improve design and layout.

3.40 Policy LP16 'Food and Drink Uses and the Evening Economy' states that proposals for food and drink uses, licensed entertainment venues and associated development will be supported where they are located within defined centres and where they do not result in harm to the character, function, vitality or viability of a centre, either individually or cumulatively. To achieve this, the policy seeks to ensure that concentrations of such uses are not located within a centre, or part of a centre, to a level that would cause harm.

3.41 In order to assess potential harm, planning applications will be considered against the following criteria:

- the number, distribution and proximity of other food and drink uses, including those with unimplemented planning permission in the centre;
- the impacts of noise, disturbance, fumes, smells, litter and late-night activity, including those arising from external areas;
- the potential for anti-social behaviour to arise, having regard to the effectiveness of measures to manage impacts through conditions or obligations;
- the availability of public transport, parking and servicing;
- highway safety;
- the provision of refuse storage and collection; and
- the appearance of associated extensions, flues and installations.

3.42 The policy further confirms that proposals for food and drink uses and licensed entertainment venues outside of defined centres will also be subject to the criteria above and will additionally be required to submit a sequential test and an impact assessment.

3.43 Policy LP17 'Huddersfield Town Centre' establishes that Huddersfield will be the principal focus for high-quality comparison retail goods within the district. This retail role will be supported by a wide range of leisure, tourism, office (including high-quality grade A space), and other main town centre uses. The town centre will also continue to provide high-quality educational facilities and opportunities for town centre living.

3.44 Proposals for new development within Huddersfield Town Centre will be supported where they:

- preserve and enhance the town's cultural and architectural heritage, open spaces, and connections to them;
- provide a safe, welcoming and inclusive destination for people of all ages, supporting activity throughout the day and evening;
- create opportunities for town centre residential living;
- provide opportunities for larger-scale individual retail floorplates;
- incorporate, where appropriate, sustainable modes of transport including pedestrian and cycle routes, cycle parking, and electric vehicle charging points;
- provide space for a range of businesses, from small start-ups to larger multinational corporations;
- contribute to the economic development and expansion of the town and district;
- retain and regenerate key historic features, such as pedestrian arcades, yards and listed buildings, both within and outside the Huddersfield Town Centre Conservation Area;
- retain and refurbish traditional shopfronts wherever practicable;
- facilitate the development and evolution of the University of Huddersfield and its Queensgate campus, enhancing its connections with the town centre core; and
- provide, where appropriate, urban green infrastructure such as street trees.

3.45 The policy also confirms that proposals on the edge of Huddersfield Town Centre, which pass the sequential test, must include enhanced connections to the town centre. Such schemes should make the town centre more attractive and accessible to pedestrians, cyclists and public transport users, and should provide appropriate enhancements to pedestrian and cycling routes.

3.46 In addition, development proposals along the Leeds Road/St Andrew's Road corridor, from the Stadium to the Town Centre, will be expected to deliver enhanced pedestrian and cycling linkages between the Stadium and the Town Centre.

3.47 Policy LP18 'Dewsbury Town Centre' establishes that Dewsbury will be a place of vibrancy, vitality and diversity, offering a mix of uses that attract visitors and create new opportunities for town centre living. The town centre will act as the main focus for retail provision in the north of the district, supported by other main town centre uses.

3.48 Proposals within Dewsbury Town Centre will be supported where they:

- preserve and enhance the strengths of, and connections to, Dewsbury Market;
- preserve and enhance the town's cultural and architectural heritage, open spaces, and connections to them;
- provide a safe, welcoming and inclusive destination for residents of all ages, supporting activity throughout the day and into the evening;
- create opportunities for town centre residential living;
- provide opportunities for larger-scale individual retail floorplates;
- incorporate, where appropriate, sustainable modes of transport including pedestrian and cycle routes, cycle parking and electric vehicle charging points;
- provide space for a range of businesses, from small start-ups to larger multinational corporations;
- create opportunities for economic development and expansion of the town and wider district;
- retain and regenerate key historic features such as pedestrian arcades, yards and listed buildings; and
- provide, where appropriate, urban green infrastructure such as street trees.

3.49 The policy also confirms that proposals on the edge of Dewsbury Town Centre, which pass the sequential test, must include enhanced connections to the town centre. Such schemes should improve accessibility and attractiveness for pedestrians, cyclists and public transport users, and provide appropriate enhancements to convenient pedestrian and cycling routes.

Hot Food Takeaway SPD

3.50 The Council adopted a Hot Food takeaway Supplementary Planning Document (SPD) in September 2022. The SPD provides detailed guidance to businesses, applicants, agents and the local community on how the Local Planning Authority will assess applications for hot food takeaways where planning permission is required, for example new hot food takeaways or applications for a variation of opening times.

3.51 The SPD is a material consideration in the determination of a planning application and provides further information and guidance that is not currently set out in local planning policy to those involved in planning applications covering hot food takeaways.

3.52 The SPD explains the overall approach to the principle of hot food takeaway proposals across Kirklees, including:

- Using local health intelligence to inform decision making via a health toolkit;
- Recognising the role of hot food takeaways in the vitality and viability of town and other centres;
- The over concentration and appropriate level of clustering of hot food takeaways in centres;
- Limiting opening hours for hot food takeaways within 400m of primary and secondary schools; and
- Limiting the impacts of takeaways in relation to environmental health, highways issues and general residential amenity.

3.53 Policy LP16 relates to food and drink uses and the evening economy, and states that such proposals will be supported, provided they are in a defined centre and subject to ensuring that matters in respect of impact on amenity and the concentration of uses is considered.

3.54 Policy HFT 1 relates to the Public Health Toolkit, and states that:

'Proposals for all new hot food takeaways will be assessed against the Kirklees Council Public Health Toolkit. Proposals that are not accepted by the toolkit will be refused, unless other material considerations indicate otherwise.

HFT1 will not apply where the application site is within the designated Principal Centres of Huddersfield and Dewsbury and the designated Town Centres of Batley, Cleckheaton, Holmfirth and Heckmondwike.'

3.55 Policy HFT 2 relates to town centre vitality and viability and states that hot food takeaways (Sui Generis) will not be supported in a principal town, town, district or local centre where the cumulative impact of introducing the facility would be detrimental to the vitality and viability of that centre.

Holme Valley Neighbourhood Plan (December 2021)

3.56 The Holme Valley Neighbourhood Development Plan (HVNDP) includes policies related to the viability and vibrancy of town centres within its area, particularly Holmfirth.

3.57 Policy 8 states that within Holmfirth Town Centre and Honley District Centre, development for retail, leisure, office, commercial, cultural, tourism and other main town centre uses will be encouraged where proposals help to enhance the viability and vibrancy of the centres.

3.58 Development proposals in these centres will be assessed against the following criteria:

- new developments and changes of use should complement existing provision and ensure that the centre continues to offer a range of uses appropriate to its role. Development should not adversely affect other amenities and facilities, including open and green space;
- proposals should be designed to secure easy pedestrian access and provide appropriate cycle and car parking (including electric vehicle charging points). Development should be within easy walking distance of public transport, incorporate clear signage and provide facilities for litter disposal;
- retail development should be located in the primary shopping areas of Holmfirth and Honley, as defined on the relevant maps. Retail development outside these areas will be subject to the sequential test;
- the reuse of upper floors for residential use will be supported where the use is compatible with ground floor commercial activity;
- distinctive and detailed historic architectural features should be retained and enhanced in accordance with other policies of the Neighbourhood Plan.
- Within Brockholes and New Mill Local Centres, development for top-up shopping and local services, particularly food and drink, will be acceptable in principle where:
- proposals are of an appropriate scale relative to other units within the local centre; and
- the amenities of local or adjoining residents or users are protected, or where suitable mitigation measures are provided to address impacts such as noise, smell or visual intrusion.

4. Healthcheck Assessments and Land Use

Introduction

4.1 Paragraph 90 of the NPPF indicates that planning policies should promote the long-term vitality and viability of town centres by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries. The same paragraph also states that town centres should accommodate a suitable mix of uses (including housing) and provide for development that reflects a centre's distinctive character.

4.2 Paragraph 006 of the Town Centres PPG identifies a range of indicators that should be assessed over time in reviewing the health of a town centre. The indicators include the following:

- diversity of uses;
- proportion of vacant street level property;
- retailer representation and intentions to change representation;
- pedestrian flows;
- accessibility;
- perceptions of safety and occurrence of crime;
- the state of town centre environmental quality;
- the balance between independent and national multiple retailers; and
- the extent to which there is an evening and night-time economy offer.

4.3 We provide a summary of each of the healthchecks of the town centres below, with full copies of the healthchecks provided at Appendix 3, accompanied by the Goad plans showing the full composition of the centres.

Huddersfield Principal Town Centre

4.4 Huddersfield serves as the principal retail, leisure and service destination within the Kirklees District, providing a substantial concentration of commercial activity across 674 units and approximately 144,465 sq.m of floorspace. The town centre's layout is compact and easily walkable, with activity concentrated along King Street, New Street and within the Kingsgate Shopping Centre, supported by a network of secondary streets and covered arcades.

4.5 The town centre benefits from a rich architectural heritage, particularly around St George's Square, which includes a number of attractive Victorian and Georgian buildings. The Grade I listed Huddersfield Railway Station, often referred to as the "St Pancras of the North", stands as a focal point of civic pride and a key arrival point into the town. This strong architectural character contributes significantly to Huddersfield's identity and sense of place.

Table 4.1: Composition of Huddersfield Town Centre, as at April 2025

Type	Floorspace (sq.m)	Floorspace (%)	Floorspace UK Average (%)	Units (no.)	Units (%)	Units UK Average (%)
Comparison	36,535	25.3	28.7	176	26.1	26.1
Convenience	30,030	20.8	15.3	60	8.9	9.3
Financial & Business	9,061	6.3	6.1	48	7.1	7.9
Leisure	25,664	17.8	27.7	149	22.1	26.5
Retail Service	7,056	4.9	7.2	88	13.1	15.8
Vacant	36,118	25.0	14.5	153	22.7	14.1
Total	**144,465**	**100.0**	**100.0**	**674**	**100.0**	**100.0**

4.6 Huddersfield's retail composition has evolved over the past decade. In 2013, comparison goods dominated with 58,710 sq.m (39.7% of floorspace), but by 2025 this had fallen to 36,535 sq.m (25.3%), reflecting both local restructuring and national retail trends. Similarly, comparison units declined from 237 (36.0%) to 176 (26.1%). Despite this contraction, the centre retains a strong core retail offer, with national multiples including Primark, River Island, TK Maxx, Boots and New Look concentrated around King Street, New Street and within Kingsgate and Packhorse shopping centres. These areas continue to act as the main retail circuit and focus for footfall.

4.7 Convenience retailing remains one of Huddersfield's key strengths. Floorspace has remained broadly stable, accounting for 20.8% of the total in 2025, above the UK average of 15.3%. The town is anchored by Sainsbury's and Tesco, complemented by smaller independent grocers, bakers and convenience stores, which are concentrated mainly along the eastern and southern edges of the centre. This mix of national and independent operators provides strong day-to-day provision and supports linked shopping trips.

4.8 Leisure uses occupy 17.8% of total floorspace and 22.1% of units, below national averages but forming an important part of the centre's offer. Cafés, pubs and restaurants are distributed along main thoroughfares and around St George's Square and Kirkgate, contributing to daytime vitality and early evening activity. Cultural and entertainment venues such as the Lawrence Batley Theatre, Huddersfield Town Hall and the Light Cinema further enhance the town's appeal, supported by a steady student population from the nearby university. The planned Cultural Heart development, incorporating new event spaces, hospitality venues and public realm improvements, is expected to strengthen the town's leisure and cultural economy, extending footfall into the evening.

4.9 Retail services, including hairdressers, beauty salons and phone repair shops, have grown modestly since 2013, with floorspace rising from 5,890 sq.m to 7,056 sq.m (4.9%), while units increased from 71 (10.8%) to 88 (13.1%). This reflects the growing importance of service-based activity in sustaining local footfall. Financial and business services, by contrast, have declined, with units falling from 68 (10.3%) to 48 (7.1%), mirroring national restructuring across the banking and professional sectors.

4.10 Vacancy levels are currently elevated, with 22.7% of units and 25.0% of total floorspace vacant, both above national averages. However, this position is largely transitional and linked to major regeneration activity rather than long-term decline. Many of the larger voids, including the former Wilko unit on New Street and the Piazza Shopping Centre, are earmarked for redevelopment under the Huddersfield Blueprint and Cultural Heart programme. Once complete, these schemes will provide new public spaces, cultural facilities and opportunities for reoccupation, significantly improving the vitality and perception of the town centre.

4.11 Huddersfield is highly accessible, benefiting from excellent rail and bus connections, strong road links via the A62 and M62, and a walkable, level topography that supports pedestrian movement. The bus and railway stations provide strong gateways into the centre, while ongoing investment through the Towns Fund and Heritage Action Zone will further enhance connectivity and public realm quality.

4.12 The environmental quality of the retail core is generally good, with clean, well-maintained pedestrianised streets and attractive frontages. Landmark buildings, well-designed public spaces such as St George's Square, and pockets of greenery create a distinctive and welcoming environment. Some secondary streets, including Wood Street, would benefit from further maintenance and consistent treatment to match the high standards of the core area.

4.13 In summary, Huddersfield remains a vital and viable town centre that continues to perform a leading role within the Kirklees district. It accommodates a broad mix of retail, service, cultural and civic uses within a compact, accessible and architecturally distinguished environment. While structural challenges persist, particularly around comparison retail decline and elevated vacancy, these are being actively addressed through a programme of strategic regeneration.

4.14 Huddersfield Town Centre contains a number of opportunity sites that have the potential to contribute meaningfully to its regeneration and long-term vitality. In recent years, Kirklees Council has taken a more proactive role in reshaping the town centre through its Huddersfield Blueprint, which is a ten-year vision for the town focused on the regeneration of key areas and the improvement of public spaces, transport, and the cultural offer.

4.15 One of the most significant opportunity areas is the Piazza Shopping Centre, which is now under Council ownership. Plans have been approved for its demolition, to make way for a new Cultural Heart that will include a refurbished Queensgate Market, a new museum and art gallery, a live music venue, and new public open space. This development represents a major transformation for the town and is expected to attract more footfall while enhancing Huddersfield's cultural identity. At the time of our visit, the site had been cleared and the construction work was progressing.

4.16 Another key site is the former House of Fraser building on King Street, which has remained vacant since 2022. Planning permission was secured in July 2019 (ref: 2018/62/93568/W) for a reconfiguration and partial change of use of the existing retail space to enable the provision of a leisure venue containing a cinema and uses including a games arcade, an adventure climbing arena, axe throwing, and a kitchen/bar area. At the time of our visit, it was evident that work had commenced. Once complete, this development will be known as The Light and will make an important contribution to the leisure offer of the town centre.

4.17 Additional opportunity sites include the area around Huddersfield Bus Station, which is identified for potential improvements as part of wider town centre accessibility and public realm enhancements. The planned station gateway improvements also present an opportunity to better connect the railway station with the rest of the town centre through new landscaping, pedestrian routes, and development frontages.

4.18 These opportunities are supported by significant public sector investment, including funding from the Government's Towns Fund and the Heritage Action Zone initiative. Together, these provide a foundation for meaningful regeneration and a renewed sense of place.

4.19 The town's heritage, accessibility and civic function are key assets, while ongoing investment through the Cultural Heart and Huddersfield Blueprint schemes is set to transform the centre's leisure, cultural and public realm offer. These initiatives, combined with its strong convenience base, educational presence and improving evening

economy, will reinforce Huddersfield's position as a vibrant, resilient and well-balanced regional centre capable of adapting to future economic and social change.

Dewsbury Principal Town Centre

4.20 Dewsbury is the second largest of Kirklees' town centres. The defined town centre is bounded by the Dewsbury Ring Road (A638), and the Goad area extends slightly to include the Lidl and other commercial units to the north. This Goad area contains 293 retail, leisure and service units amounting to 42,278 sq.m gross. The layout of the town centre partly reflects Dewsbury's historic and present role as a market town. The main shopping and leisure streets are dispersed around Market Place, Foundry Street, and the Princess of Wales Shopping Centre.

4.21 The latter provides a focus for comparison retailers, including some national multiples. The Rishworth Centre and the other surrounding edge-of-centre retail warehouse units are relatively well-connected to the town centre and provide for larger-format non-food shopping uses.

Table 4.2: Composition of Dewsbury Town Centre, as at April 2025

Type	Floorspace (sq.m)	Floorspace (%)	Floorspace UK Average (%)	Units (no.)	Units (%)	Units UK Average (%)
Comparison	9,097	21.5	28.7	62	21.2	26.1
Convenience	6,221	14.7	15.3	24	8.2	9.3
Financial & Business	3,433	8.1	6.1	20	6.8	7.9
Leisure	5,551	13.1	27.7	47	16.0	26.5
Retail Service	3,215	7.6	7.2	28	9.6	15.8
Vacant	14,760	34.9	14.5	112	38.2	14.1
Total	**42,278**	**100.0**	**100.0**	**293**	**100.0**	**100.0**

4.22 A Lidl supermarket lies to the north-west of the town centre, within the Goad area but outside the defined boundary. Additional large edge- and out-of-centre national multiple foodstores located to the south (Asda, Aldi, Sainsbury's and Iceland) provide for the vast majority of local residents' day-to-day convenience needs. As a result, convenience provision within the defined centre itself is largely independent and supplemented by the Market traders, which focus on traditional and specialist food products.

4.23 The evening economy is limited for a centre of Dewsbury's size and role. While there are some scattered pubs and restaurants, proportions of both leisure floorspace and units are well below UK averages and takeaways comprise the dominant late-opening use. Addressing the current lack of a well-rounded evening economy is a key aim of much of the recent and ongoing investment in Dewsbury. Amongst other things, the Dewsbury Market and town centre park investment seeks to support the development of quality food and beverage outlets and the creation of a broader offer with event space that encourages visitors (and particularly families) to spend time in the town centre in the evenings.

4.24 Dewsbury, in common with many similarly sized town centres across the UK, suffers from an oversupply of vacant former retail floorspace. In Dewsbury, the issue is slightly compounded by the fact that much of the commercial stock is historic in nature, and often listed, which can make it challenging and costly to bring vacant premises back into beneficial use. That said, it should be noted that a number of the spaces identified as vacant in the table above were under alteration on the day of our site visit because of ongoing works, including:

- the former Wilko unit at 20 Crackenedge Lane, which has subsequently opened as the Umrah supermarket;
- units at Dewsbury Bus Station, which are being redeveloped as part of a £23m plan to transform the way people travel in and around the town centre, including improved interior design and better accessibility for all bus station users and upgraded public entrances and exits; and
- the town centre's Grade II Listed Victorian Arcade, which is the subject of a £3.68m scheme to create the UK's first community-run shopping arcade, focussing on local independent businesses in the creative sector.

4.25 Good private and public transport linkages are a key strength of Dewsbury, and new footway/cycleway facilities are a priority project in the Dewsbury Town Investment Plan. The same Investment Plan seeks to make better use of Dewsbury's attractive historic shopping environment through a building revival scheme aimed at providing support for the conversion of buildings to employment and residential use where appropriate, and improving shopfronts to a Conservation Area Standard. The project will link to the Dewsbury Townscape Heritage Initiative and involve grant assistance to owners providing quality accommodation. This work will be in addition to public realm improvements, including a new park and the aforementioned enhancements to the Arcade.

4.26 While our overall conclusion on the current health of Dewsbury town centre is that it is showing signs of weakness, there are strong grounds for optimism regarding its future vitality and viability. Significant regeneration activity is planned following the successful securing of £25 million in government funding. Work has already commenced at the Victorian Arcade, Dewsbury Market and Town Park, with further investment scheduled for the redevelopment of the Bus Station. Collectively, these projects are expected to increase footfall and help attract private sector investment back into the town centre. In addition, the Daisy Hill neighbourhood will deliver new residential development within the town centre, which will increase the number of residents living centrally and encourage greater day-to-day use of the centre, thereby supporting its long-term vitality and viability.

Batley Town Centre

4.27 Batley is a traditional market town, with a compact and walkable layout focused around Commercial Street and Market Place. The town centre accommodates a diverse mix of retail, leisure and service uses, performing an important role in meeting the everyday needs of its local community. The centre's character is strongly defined by its heritage buildings, civic landmarks and market tradition, with Batley Town Hall providing a prominent architectural focal point at the heart of the town. Independent retailers form a key part of Batley's identity and contribute to its distinctive offer. Many cater to the town's diverse community, with specialist fashion, beauty, and food outlets that add local flavour and authenticity.

Table 4.3: Composition of Batley Town Centre, as at April 2025

Type	Floorspace (sq.m)	Floorspace (%)	Floorspace UK Average (%)	Units (no.)	Units (%)	Units UK Average (%)
Comparison	2,683	9.3	28.7	30	18.0	26.1
Convenience	12,800	44.5	15.3	21	12.6	9.3
Financial & Business	558	1.9	6.1	7	4.2	7.9
Leisure	6,593	22.9	27.7	54	32.3	26.5
Retail Service	2,997	10.4	7.2	27	16.2	15.8
Vacant	3,109	10.8	14.5	28	16.8	14.1
Total	**28,739**	**100.0**	**100.0**	**167**	**100.0**	**100.0**

4.28 Batley's open market continues to operate from Market Place opposite the Town Hall, primarily on Fridays, contributing to local identity and supporting small traders. Other notable historic buildings, including Batley Baths on Cambridge Street, reinforce the town's distinctive historic and civic character. The town centre's retail and service offer is supported by a range of independent shops, cafés and local services, complemented by a number of national operators such as Card Factory and Savers.

4.29 Convenience retailing remains the cornerstone of the town centre's offer. Floorspace in this category accounts for 44.5% of the total, far above the UK average of 15.3%, demonstrating Batley's role as a key destination for day-to-day shopping. The centre benefits from Tesco and Asda supermarkets, which provide strong retail anchors and drive consistent footfall throughout the day. These are supported by smaller Aldi and Iceland supermarkets, together with a range of smaller independent convenience retailers which contribute to the everyday shopping provision. Overall, Batley performs well in meeting the main food shopping and top-up needs of its local population.

4.30 Batley's proportions of comparison goods retail floorspace and units have contracted significantly since 2013, in line with national trends affecting smaller centres. Current levels of provision are well below UK averages. As might be expected for a centre of this size and role in the hierarchy, the non-food sector in Batley is dominated by independent traders. That said, the town centre is able to support some national multiples, again concentrated at the budget end of the market, including Savers, Card Factory and Shelter.

4.31 Batley Plaza is an important retail and leisure development which opened in 2021 in the refurbished former Alfreds' Way and Batley Shopping Centre. The complex is almost exclusively let to traders from the local area of Batley and Dewsbury, and many are start-up businesses. A number of boutique-style independent clothing shops are concentrated within the Plaza, and it also provides for a number of food and drink operators which contribute to Batley's evening economy.

4.32 Primarily as a result of the Plaza development, leisure uses in Batley have expanded significantly since 2013 and now form a more visible part of the town centre offer. The majority of Batley's leisure operators fall within the food and beverage category, including cafés, hot food takeaways, public houses, and restaurants. These uses add vibrancy to the centre offer, particularly during lunchtime and evening periods.

4.33 Batley's floorspace vacancy rate has increased modestly since 2013 but remains below the national average, indicating a degree of resilience despite wider retail challenges. The proportion of vacant units, on the other hand, has decreased over the same period but remains above average. Empty premises are distributed throughout the centre, primarily along Commercial Street, but are generally small in scale and well-maintained. The former Yorkshire Bank unit on Commercial Street is the most prominent long-term vacancy, though its location among active traders and steady daytime footfall helps to reduce the sense of inactivity.

4.34 Accessibility is a key strength. Batley benefits from several public car parks located close to the main shopping streets, regular bus services connecting to Dewsbury, Leeds and Huddersfield, and Batley Railway Station within walking distance (approximately nine minutes from the core). The streets are wide and generally level, creating a pedestrian-friendly environment with good connectivity between the retail and service areas.

4.35 In summary, Batley is a reasonably vital and viable town centre that performs well in serving its primary role as a shopping and service destination meeting the day-to-day needs of local residents. The centre's strong convenience provision, anchored by Asda and Tesco and supported by Aldi and Iceland, underpins steady footfall throughout the day and helps to maintain overall vitality and viability. This is supported by a diverse range of independent traders and leisure operators, including the unique offer provided within Batley Plaza, which add local character.

Moreover, continued investment and efforts to diversify uses, animate public spaces, and deliver the improvements identified in the Batley Blueprint will help consolidate its role as a thriving, community-focused centre within the district.

Cleckheaton Town Centre

4.36 Cleckheaton provides for 161 retail, leisure and service units amounting to 17,471 sq.m gross. The town centre is focussed around Northgate and Bradford Road, which run north to south, with Albion Street, Cheapside and Market Street running east to west between these two main thoroughfares. The King Edward VII Memorial Park provides greenspace to the south-east of the town centre.

Table 4.4: Composition of Cleckheaton Town Centre, as at April 2025

Type	Floorspace (sq.m)	Floorspace (%)	Floorspace UK Average (%)	Units (no.)	Units (%)	Units UK Average (%)
Comparison	3,227	18.5	28.7	31	19.3	26.1
Convenience	3,501	20.0	15.3	14	8.7	9.3
Financial & Business	1,448	8.3	6.1	17	10.6	7.9
Leisure	4,471	25.6	27.7	44	27.3	26.5
Retail Service	2,365	13.5	7.2	38	23.6	15.8
Vacant	2,458	14.1	14.5	17	10.6	14.1
Total	**17,471**	**100.0**	**100.0**	**161**	**100.0**	**100.0**

4.37 Convenience provision is dominated by the town centre's Tesco supermarket, which fulfils the majority of the day-to-day grocery shopping needs of local residents. This anchor store is supported by a Heron Foods frozen food specialist and a range of smaller, largely independent food retailers including bakers, butchers, confectioners, convenience stores, and health foods shops. The large size of the Tesco results in Cleckheaton's proportion of convenience floorspace being well above the UK average, whereas in terms of units its level of provision is broadly in line with (and slightly below) the national average.

4.38 The levels of comparison representation in Cleckheaton town centre have fallen since 2013 and remain substantially below the relevant UK averages, although this is in the context of broader market trends which have seen non-food retail provision reduce across the country. The largest comparison unit in the town centre by far is the Home Bargains store on Horncastle Street (which includes a convenience offer), and there is also limited representation from other national multiples including Hallmark, Specsavers and several charity shop operators (Age UK, Oxfam, RSPCA). The rest of the offer predominantly comprises small-scale independent retailers which are dispersed throughout the centre. These provide for a good variety of products including antiques, cards and gifts, clothing, DIY goods and domestic appliances, flowers, hearing aids, household goods, jewellery, mobile phones and accessories, pharmaceuticals, second-hand goods, and toys and games.

4.39 Cleckheaton's indoor market hall adds diversity and distinctiveness to its retail offer. Its traders sell a variety of often locally sourced products including fresh fruit and vegetables, delicatessen goods, pet food and supplies, household lighting, handbags and luggage, and ladies clothing. There is also a popular café which offers outdoor seating in the summer months. However, the market hall itself is tired and unwelcoming in appearance, and its refurbishment is identified as a key priority in the Cleckheaton Blueprint. The Blueprint also seeks to improve

linkages between the market and the soon-to-be-enhanced Savoy Square. This investment should help to build on the important contribution that the market already makes to the town centre and secure its long-term future.

4.40 The leisure offer in Cleckheaton has expanded considerably since 2013, and is well-developed for a centre of relatively modest size. While the town centre's level of leisure floorspace is below the national average, it has a greater proportion of units in leisure use than a typical centre in the UK. Provision includes a theatre, located in the Grade II Listed Town Hall building, which serves as an important destination for hosting local amateur dramatic, dance and drama productions. The remaining leisure operators in the town centre are predominantly in food and drink use, and these include a number of bars, pubs, restaurants, and takeaways which all contribute to a vibrant and growing evening economy.

4.41 Like other town centres at this level in the Kirklees hierarchy, Cleckheaton is fairly service-focussed, with its proportions of retail service and financial & business service floorspace and units exceeding the relevant national averages. The variety of operators in the town centre is reasonably good and, as expected, geared towards meeting everyday needs. Importantly, there is representation from a bank (Virgin Money) and Post Office, which prevent local residents having to travel to destinations beyond Cleckheaton to fulfil their need for financial services.

4.42 Town centre vacancy rates have increased in Cleckheaton since 2013 but remain below UK averages, particularly in terms of units. The largest individual vacancy recorded by our survey was the Horncastle Autos unit on Horncastle Street, but this was under alteration on the day of our visit. The remaining unoccupied premises are generally small in scale, well-maintained and dispersed throughout the centre, all of which limits the extent of their adverse impacts on the look and feel of the street-scene.

4.43 Overall, Cleckheaton is considered to be a reasonably healthy town centre with good prospects for its long-term vitality and viability. Its strengths include an attractive shopping environment, a developing evening economy, and locally important assets such as its market and theatre. The investments outlined in the Cleckheaton Blueprint are well-placed to build on these strong foundations and further enhance the town centre's role and appeal.

Heckmondwike Town Centre

4.44 Heckmondwike is one of Kirklees' smallest town centres, comprising 138 retail, leisure and service units providing for approximately 23,317 sq.m gross of commercial floorspace. The town centre is loosely focussed around the traditional shopping and leisure thoroughfares of Westgate/High Street, and Market Street. In the west lies Heckmondwike The Green, a landscaped public space featuring a circular grassed area with a bandstand and war memorial framed by formal planting. In addition, the Northgate Retail Centre in the north and the Morrisons complex on Union Street in the south offer more modern, large-format retail units.

Table 4.5: Composition of Heckmondwike Town Centre, as at April 2025

Type	Floorspace (sq.m)	Floorspace (%)	Floorspace UK Average (%)	Units (no.)	Units (%)	Units UK Average (%)
Comparison	5,490	23.5	28.7	31	22.5	26.1
Convenience	7,501	32.2	15.3	13	9.4	9.3
Financial & Business	1,082	4.6	6.1	12	8.7	7.9
Leisure	3,684	15.8	27.7	28	20.3	26.5
Retail Service	3,143	13.5	7.2	33	23.9	15.8

Type	Floorspace (sq.m)	Floorspace (%)	Floorspace UK Average (%)	Units (no.)	Units (%)	Units UK Average (%)
Vacant	2,417	10.4	14.5	21	15.2	14.1
Total	**23,317**	**100.0**	**100.0**	**138**	**100.0**	**100.0**

4.45 Heckmondwike is served by two supermarkets, which provide for a broad spectrum of day-to-day food shopping needs, these being the Morrisons superstore on Union Street and the Lidl at Northgate Retail Centre. The remaining town centre convenience operators are small in scale and mostly independent. These primarily comprise convenience stores and vape shops, but there is also representation from bakers, a health foods shop, and a shoe repairs business.

4.46 The town centre's comparison national multiples are concentrated in Northgate Retail Centre, which provides for operators such as Peacocks, Card Factory and Poundstretcher. The rest of the non-food retail offer comprises a good variety of operators, scattered across the centre and trading from a range of sizes and formats of units. Provision is somewhat skewed towards the lower or budget end of the market, but the town centre does offer a reasonably broad range of products including beds and furniture, cards and gifts, clothing, DIY supplies and hardware, domestic appliances, household goods, electronics, flowers, jewellery, second-hand items, toiletries, pet products, and pharmaceuticals.

4.47 Heckmondwike town centre has a relatively limited evening economy, denoted by three scattered pubs and one restaurant, along with a plethora of takeaway operators dispersed throughout. The introduction of more diverse evening economy uses, such as family restaurants, would be a welcome addition and encourage longer dwell times to bring footfall and activity to the town centre after daytime hours. Such uses could also help to build on the success of the popular local events hosted at The Green, which include the annual Heckmondlight Festival, as well as the new event space at New Square.

4.48 The vacancy rate in Heckmondwike is above the national average in terms of units but below average in terms of floorspace, reflecting the relatively small-scale nature of much of the town centre's commercial stock. While vacancies are found in most parts of the centre, there are few concentrations or clusters. The modest sizes of many of the empty units and the surrounding active frontages limit their adverse impacts on the look and feel of the centre.

4.49 Heckmondwike's strengths include its historic shopping environment, which includes several high-quality and attractive heritage assets such as the town centre's Grade II Listed drinking fountain and its access to greenspaces including The Green and Algernon Firth Park. It also benefits from reasonably good road and bus links, although there are opportunities to enhance its cycle and pedestrian connectivity.

4.50 Owing to its layout, which is bisected by the relatively wide and busy roads of Westgate/High Street and Market Street, traffic congestion sometimes inhibits pedestrian flows in Heckmondwike and can detract from the environmental quality of the centre. The town centre also suffers from elevated crime rates compared to other parts of West Yorkshire, which may in part reflect the lack of a well-developed evening economy to bring activity and surveillance to the town centre after dark.

4.51 The Heckmondwike Blueprint is a £1.5m investment plan set to be implemented over the next ten to fifteen years. Progress with some of the key Blueprint projects was evident on the day of our fieldwork visit, including the New Square and the Bus Station redevelopment. The Blueprint projects represent an important opportunity for

Heckmondwike to build on its strengths (including its rich heritage, greenspaces and accessibility), address many of the existing issues highlighted in our full healthcheck, and support local businesses by encouraging more footfall and catalysing further investment.

4.52 Overall, we consider Heckmondwike to be a reasonably healthy centre, with strong potential for its vitality and viability to be significantly enhanced in the short to medium term through the ongoing implementation of the Blueprint projects.

Holmfirth Town Centre

4.53 Holmfirth serves as an important retail, leisure and service centre within Kirklees, meeting the day-to-day needs of its local population while also attracting visitors as a cultural and tourist destination known as the filming location of the sitcom Last of the Summer Wine. It is the smallest town centre in the District, accommodating 137 units and providing approximately 13,174 sq.m of commercial floorspace. The main concentration of activity lies along Victoria Street, Huddersfield Road and Towngate, supported by a network of smaller side streets containing independent shops, cafés and services. The compact layout, set within the valley of the River Holme, creates a distinctive and attractive environment that enhances the town's overall character.

Table 4.6: Composition of Huddersfield Town Centre, as at April 2025

Type	Floorspace (sq.m)	Floorspace (%)	Floorspace UK Average (%)	Units (no.)	Units (%)	Units UK Average (%)
Comparison	3,332	25.3	28.7	39	28.5	26.1
Convenience	2,315	17.6	15.3	10	7.3	9.3
Financial & Business	831	6.3	6.1	12	8.8	7.9
Leisure	4,146	31.5	27.7	42	30.7	26.5
Retail Service	1,240	9.4	7.2	24	17.5	15.8
Vacant	1,311	9.9	14.5	10	7.3	14.1
Total	**13,174**	**100.0**	**100.0**	**137**	**100.0**	**100.0**

4.54 Convenience retailing has remained robust and continues to perform well. Floorspace in this category has increased to 17.6% of the total, above the UK average of 15.3%, reflecting steady demand for local grocery provision. The offer is anchored by moderately sized Co-op and Sainsbury's Local foodstores, supported by a range of high-quality independents such as butchers, bakers, delicatessens and local produce outlets, which enhance Holmfirth's reputation as a destination for artisan and speciality food.

4.55 Comparison goods retailing has decreased in both absolute and proportional terms since 2013, consistent with wider national trends. Nonetheless, Holmfirth maintains a healthy representation of independent non-food retailers, including gift shops, clothing boutiques, art galleries and homeware stores, complemented by a small number of national multiples. This mix supports both local shoppers and the town's visitor economy.

4.56 Leisure uses have grown significantly over the past decade, becoming the largest single category within the town centre. Floorspace has increased from 3,680 sq.m (28.3%) to 4,146 sq.m (31.5%), and units from 32 (26.4%) to 42 (30.7%), both above national averages. The majority of operators are food and drink venues, including cafés, restaurants, bars and public houses. This strong hospitality offer, combined with cultural attractions such as The Picturedrome, underpins Holmfirth's role as both a daytime and evening destination and contributes to its vitality throughout the week.

4.57 Retail services, including hairdressers, beauty salons and opticians, have also expanded since 2013, accounting for 9.4% of total floorspace and 17.5% of units, both above UK averages. These operators play a valuable role in supporting local needs and ensuring variety across the town centre. Financial and business services have remained stable, comprising 6.3% of floorspace and 8.8% of units, closely aligned with national levels. Banks, estate agents and professional offices are concentrated along the main streets, maintaining Holmfirth's role as a service hub for the wider Holme Valley.

4.58 Vacancy levels in Holmfirth remain low relative to national averages, with 9.9% of total floorspace and 7.3% of units currently unoccupied. These figures represent a modest increase since 2013 but continue to indicate a healthy and resilient centre. Vacant premises are small, dispersed and generally well-maintained, with no significant clusters. Most voids are located along Victoria Street and secondary frontages, where opportunities exist for new independent traders and specialist occupiers. The continued strength of demand from independent and leisure operators has helped to ensure that vacant units are typically reoccupied quickly, contributing to the town's overall vitality.

4.59 Holmfirth's heritage is one of its defining strengths, with more than ten Grade II listed buildings located within the town centre, including The Picturedrome, a well-known live music venue that attracts visitors from across the region, and the Church of the Holy Trinity. The town's historic stone architecture, coupled with its picturesque riverside setting, contributes to a strong sense of place and reinforces its identity as a heritage-led destination. Car parking is available at Huddersfield Road Car Park and a number of smaller sites, providing convenient access for residents and visitors alike.

4.60 The town is undergoing significant investment through the Holmfirth Blueprint and Town Centre Access Plan (TCAP), which are delivering major improvements to accessibility, movement and public space. These include the creation of a new community square on the former Market Hall site, widened footways, Yorkstone paving, new lighting and improved crossings. The scheme will strengthen the town's function as a cultural and community hub, supporting local businesses and improving the visitor experience.

4.61 In summary, Holmfirth performs strongly as both a service centre and visitor destination, with a distinctive mix of independent shops, cafés, restaurants and cultural attractions set within an attractive historic environment. Its low vacancy rate, strong leisure presence and ongoing public realm investment indicate a vital and viable town centre with long-term resilience. The town's character, heritage and active cultural scene underpin its continued success, while forthcoming improvements through the Holmfirth Blueprint and Access Plan will further enhance accessibility, sustainability and the overall visitor experience. Together, these strengths ensure Holmfirth remains a thriving, distinctive and well-balanced centre serving both local residents and a wider regional catchment.

5. Population and Expenditure

Study Area and Household Survey

5.1 A survey of 1,205 households was undertaken by NEMS Market Research across the ten zones which comprise the Study Area, in order to ascertain where residents go to undertake a range of shopping and leisure activities.

5.2 The below Table 5.1 identifies the postcode sectors which define each of the ten zones. A plan defining the geographic extent of the Study Area and the below zones is provided at Appendix 1.

Table 5.1: Study Area Zones by Postcode Sector

Survey Zone	Postcode Sectors
1 - Huddersfield	HD1 1, HD1 2, HD1 3, HD1 4, HD1 5, HD1 6, HD4 5, HD4 6, HD4 7
2 – Kirkheaton and Rawthorpe	HD2 1, HD2 2, HD5 0, HD5 8, HD5 9
3 – Elland and Brighouse	HD6 1, HD6 2, HD6 3, HD6 4, HX4 0, HX4 8, HX4 9, HX5 0, HX5 9
4 – Cleckheaton and Mirfield	BD19 3, BD19 4, BD19 5, BD19 6, WF14 0, WF14 8, WF14 9, WF15 6, WF15 7, WF15 8, WF16 0, WF16 9
5 – Lindley and Marsden	HD3 3, HD3 4, HD7 4, HD7 5, HD7 6
6 – Skelmanthorpe and Netherton	HD8 0, HD8 8, HD8 9, WF4 4
7 – Holmfirth	HD9 1, HD9 2, HD9 3, HD9 4, HD9 5, HD9 6, HD9 7
8 – Dewsbury and Ravensthorpe	WF12 0, WF12 7, WF12 8, WF12 9, WF13 1, WF13 2, WF13 3, WF13 4
9 – Batley and Birstall	WF17 0, WF17 5, WF17 6, WF17 7, WF17 8, WF17 9
10 – Morley	BD4 0, BD4 6, BD4 9, BD11 1, BD11 2, BD12 0, BD12 7, BD12 8, BD12 9, LS27 0, LS27 7, LS27 8, LS27 9, WF2 0, WF3 1, WF3 2, WF5 0, WF5 8, WF5 9

5.3 The above ten zones were used as the basis for the NEMS household survey, which underpin the quantitative retail capacity assessment which follows at Section 6 of the report and the quantitative leisure capacity assessment at Section 7.

5.4 To identify the expenditure claimed by retail destinations (and the capacity which is potentially available to support additional retail and leisure development), the first step is to estimate the population and future convenience and comparison goods expenditure associated with the Study Area.

Study Area Population

5.5 The population within each postcode sector and each zone at 2025 has been calculated using Experian Micromarketer G3 data (2023 estimate, which was issued in September 2024). We have confirmed with Council Officers that Experian's population projections are broadly consistent with the level of growth which is being planned for across the authority area in practice.

5.6 Table 5.2 below sets out Experian's population projections for each zone in the Study Area for reporting years 2025, 2030, 2035, 2040 and 2043.[13]

[13] The reporting years relate to five year intervals across the forthcoming plan period (working back from 2040), with an additional reporting year of 2043.

Table 5.2: Estimated Study Area Population by Survey Zone

Zone	2025	2030	2035	2040	2043
1	57,371	57,875	58,469	59,184	59,706
2	61,194	61,779	62,360	62,949	63,433
3	49,490	49,579	49,780	50,045	50,181
4	74,718	75,231	75,534	75,815	76,011
5	55,412	55,827	56,134	56,542	56,706
6	44,292	44,995	45,425	45,532	45,538
7	36,952	37,232	37,488	37,578	37,618
8	64,327	65,336	66,431	67,809	68,827
9	44,824	45,532	46,235	47,229	47,918
10	141,308	143,716	145,609	147,327	148,173
Total	**629,888**	**637,102**	**643,465**	**650,010**	**654,111**

Source: Table 1 of Appendix 4

5.7 Based on Experian's population projections, we estimate that the Study Area population will increase from 629,888 persons at 2025 to 654,111 persons at 2043. This equates to an increase of 24,223 persons (or 3.8% over the 18-year period).

Retail Expenditure

5.8 In order to calculate per capita convenience and comparison goods expenditure, we have utilised Experian Micromarketer G3 data, which provides detailed information on local consumer expenditure that takes into consideration the socio-economic characteristics of the local population. The base year for the Experian expenditure data is 2023. Our methodology takes account of the fact that some special forms of trading expenditure[14] is not available to support retail floorspace, and then allows for increases in per capita expenditure growth on an annual basis.

5.9 Figure 5 of Appendix 3 of ERPBN22 provides estimates in respect of the proportion of convenience and comparison goods expenditure that will be committed through special forms of trading both now and in the future. We have 'stripped out' any survey responses which relate to expenditure committed via special forms of trading and have instead made an allowance derived from Experian's recommendations (which we consider to be the most appropriate means by which to account for such expenditure).

5.10 We set out Experian's expenditure growth estimates within the below Table 5.3.

5.11 In considering special forms of trading, many products which are ordered online are actually sourced from a store's shelves or stockroom in practice (this is particularly the case with convenience goods). As such, expenditure committed in this manner acts to sustain shops and can be considered 'available' to support floorspace within the Study Area. Accordingly, in order not to overstate the influence of special forms of trading on retailers, our methodology utilises Experian's 'adjusted' allowance for special forms of trading (which is provided at Figure 5 of ERPBN22). This allowance indicates that 5.0% of convenience goods expenditure and 23.1% of comparison goods expenditure is 'lost' to shops at base year 2023 through special forms of trading purchases.

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

5.12 Having made an allowance for special forms of trading, we then take account of projected changes in expenditure in accordance with the recommendations provided by Figure 6 of Appendix 3 of ERPBN22. Experian provides overall growth rates and 'adjusted' rates, which account for any additional increases in expenditure lost to special forms of trading. The latest growth rates suggest that growth in comparison goods expenditure should pick up in the next few years as confidence in the economy returns, with this following a number of turbulent years following the start of the Covid-19 pandemic in 2020. The applicable annual per capita growth rates are set out below at Table 5.3.

Table 5.3: Experian Retail Planner Briefing Note 22 Convenience and Comparison Goods Annual Per Capita Growth Rates

Year	Convenience Goods	Convenience Goods 'Adjusted SFT'	Comparison Goods	Comparison Goods 'Adjusted SFT'
2023	-2.8	-3.3	-1.7	-2.2
2024	-2.4	-1.9	-2.0	-1.7
2025	-1.3	-0.9	-0.7	0.4
2026	-1.0	-0.7	0.7	0.9
2027	-1.1	-0.6	1.0	1.3
2028	-0.9	-0.4	1.8	2.0
2029	-0.8	-0.4	2.0	2.2
2030	-0.8	-0.4	2.0	2.2
2031	-0.8	-0.4	1.9	2.2
2032	-0.8	-0.3	1.9	2.2
2033	-0.8	-0.3	1.9	2.2
2034	-0.8	-0.3	1.9	2.1
2035	-0.7	-0.3	1.9	2.1
2036	-0.7	-0.3	1.8	2.1
2037	-0.7	-0.3	1.8	2.1
2038	-0.7	-0.3	1.8	2.1
2039	-0.7	-0.3	1.8	2.1
2040	-0.7	-0.3	1.8	2.0

Source: Figure 7 of Appendix 3, Experian Retail Planner Briefing Note 22 (March 2025)

5.13 For convenience goods, Experian does not forecast any per capita expenditure growth across the entire period to 2040. The position in respect of comparison goods expenditure is more positive.

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

5.15 In this regard, we note that paragraph 90 of the NPPF requires local planning authorities to allocate sites to meet likely town centre needs **'…looking at least ten years ahead'**, which differs from the previous requirement to meet needs across the entire plan period. This change is reflective of turbulent economic conditions and the pace of

change within the retail sector in recent years. By applying Experian's recommendations in respect of special forms of trading and expenditure growth, we can produce expenditure estimates for each survey zone and the overall Study Area at 2025, 2030, 2035, 2040 and 2043.

Convenience Goods Expenditure

5.16 Taking into account the Study Area resident population and the available per capita convenience goods expenditure, we estimate that £1,568.7m[15] of convenience goods expenditure originates within the Study Area at 2025. The below Table 5.4 indicates that available Study Area convenience goods expenditure is forecast to decrease to £1,524.7m at 2043.

Table 5.4: Total Available Study Area Convenience Goods Expenditure

2025 (£m)	2030 (£m)	2035 (£m)	2040 (£m)	2043 (£m)
1,568.7	1,547.2	1,537.5	1,529.4	1,524.7

Note: In 2023 prices

5.17 Table 5.5 indicates that this represents a decrease of £44.0m (or -2.8%) across the Study Area between 2025 and 2043.

Table 5.5: Growth in Available Study Area Convenience Goods Expenditure

Growth 2025-2030 (£m)	Growth 2025-2035(£m)	Growth 2025-2040 (£m)	Growth 2025-2043 (£m)
-21.5	-31.2	-39.4	-44.0

Note: In 2023 prices

5.18 We have assumed that 75% of available convenience goods expenditure would take the form of main food shopping and that 25% would take the form of top-up shopping (which relates to smaller purchases often made using a basket rather than a shopping trolley).[16]

5.19 By applying this ratio, we estimate that main food shopping trips account for £1,176.5m of Study Area convenience goods expenditure at 2025, and top-up shopping trips account for £392.2m.

Comparison Goods Expenditure

5.20 For comparison goods, Table 5.6 sets out our estimate that the resident population of the Study Area will generate £1,817.3m of comparison goods expenditure at 2025. Available comparison goods expenditure is then forecast to increase to £2,685.6m at 2043.

Table 5.6: Total Available Study Area Comparison Goods Expenditure

2025 (£m)	2030 (£m)	2035 (£m)	2040 (£m)	2043 (£m)
1,817.3	2,001.3	2,248.5	2,516.2	2,685.6

Note: In 2023 prices

5.21 The identified increase in comparison goods expenditure growth is substantial, but it represents a level of annual growth that is more circumspect than that which has been achieved in the past. This is due to both a reduction in the overall level of growth when compared to that achieved in the early part of this millennium, and as a result of

[15] In 2023 prices, as is every subsequent monetary reference.
[16] This is a standard split applied in undertaking this exercise.

further forecast increases in expenditure committed via special forms of trading (most obviously, internet shopping).

5.22 As the below Table 5.7 identifies, our assessment estimates that there will be an increase of £868.5m (equating to 47.8%) in respect of Study Area comparison goods expenditure between 2025 and 2043.

Table 5.7: Growth in Available Study Area Comparison Goods Expenditure

Growth 2025-2030 (£m)	Growth 2025-2035 (£m)	Growth 2025-2040 (£m)	Growth 2025-2043 (£m)
184.0	431.2	698.9	868.5

Note: In 2023 prices

5.23 We sub-divide comparison goods expenditure into eight categories, these being: 'DIY', 'Electrical' and 'Furniture' (collectively referred to as bulky goods); and 'Clothing and Footwear', 'Books, CDs and DVDs', 'Health, Beauty and Chemist Goods', 'Small Household Goods', and 'Toys, Games, Bicycles and Recreational Goods' (collectively referred to as non-bulky goods). The proportion of expenditure directed to each sub-category is estimated by Experian on a zonal basis. Experian's estimates are reflected in the detailed expenditure tables set out at Table 7b of Appendix 4 of this report.

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

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

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

6. Market Research – Household Surveys

Market Share Analysis: Household Survey Results

6.1 The NEMS household survey identifies where residents travel to undertake a range of shopping and leisure activities. The summary of results provided in this section focuses on the market share of shopping trips secured by retail venues for various types of shopping. A survey of 1,205 households was undertaken by NEMS Market Research in order to ascertain where residents go to undertake a range of shopping and leisure activities.

6.2 In reviewing the Study Area, it is important to recognise that the vast majority of convenience goods expenditure generated within a given area is generally claimed by local foodstores. This is because shoppers look to source convenience goods close to home. Comparison goods shopping is more likely to result in longer trips to source goods at higher order destinations. As such, it is to be expected that a substantial proportion of comparison goods shopping trips 'leak' outside of the Study Area to shopping venues offering greater choice.

6.3 The household survey is reproduced as part of Appendix 2 of this Study. In retail terms, the principal purpose of the survey is to establish:

- patterns of convenience goods spending, based on the location of:
  - the shops or shops respondents last visited and visited 'the time before last' to undertake their main food shop; and
  - the shop or shops respondents last visited and visited 'the time before last' to undertake their main top-up food shop.

- patterns of comparison goods spending, based on the local of the respondent's last shopping trip to purchase the following types of comparison goods:
  - clothing and footwear;
  - books, CDs, DVDs and stationery;
  - small household goods, such as home furnishings, clocks, jewellery, glass and china;
  - toys, games, bicycles and recreational goods;
  - chemist goods, including health and beauty items;
  - electrical goods, such as televisions, washing machines and computers;
  - DIY and gardening goods; and
  - furniture, carpets and floor coverings.

6.4 The analysis which follows considers market share for the above sub-sectors. Our assessment is based on the market share of expenditure to particular 'bricks and mortar' retail destinations. For comparison goods, the zonal market share secured by each retail destination for each of the above eight sub-sectors is taken directly from the corresponding household survey question responses.

6.5 For convenience goods, the methodology differs. We have found that retail assessments of this nature can often overstate the turnover of discount foodstores and understate the turnover of larger format stores operated by the 'big four'. This is because apportioning 'main food' convenience goods expenditure in accordance with a household survey fails to account for the fact that goods are generally cheaper at discount foodstores. Such foodstores are also typically of a lesser scale and may not sell all products (for example, they may have a lesser range in respect of ingredients and in respect of ready meals). The consequence of this is that trips to a discount foodstore may often result in a lesser level of expenditure than trips to a large food superstore.

6.6 For convenience goods, our household survey asks respondents the shop they last visited and visited 'the time before last' to undertake their main food shop. For each of these trips, the respondent is also asked how much they spend on main food shopping in visiting the respective foodstore.

Retail Goods Market Share Analysis

Convenience Goods Market Share

6.7 Our analysis begins by reviewing the retention of convenience goods expenditure within each of the ten Study Area zones (i.e. the proportion of expenditure originating within a given zone which is claimed by retailers located within that same zone). This enables an understanding of whether residents are having to travel to meet their convenience goods shopping requirements, or if they are typically able to meet their needs in proximity to where they live. It is accepted that some respondents will live towards the boundary of their respective zones and some trips will therefore be able to be undertaken to nearby zones in a sustainable manner.

6.8 Table 6.1 demonstrates that within all zones except Zone 6, the main food shopping trips retained within the same corresponding zone falls above 45% in each case, and within Zones 2, 3, 4, 7 and 9, this retention rate is above 70%. This high retention rate across the majority of zones indicates that there is a good provision of convenience destinations meeting the main food needs of residents in proximity to where they live.

6.9 In terms of those zones which cover the Kirklees authority area, the highest main food retention levels are within Zone 2 which covers the northern half of Huddersfield, Zone 4 which covers Cleckheaton, Zone 7 which covers Holmfirth and Zone 9 which covers Batley. In each case, there are large format convenience foodstores which are drawing high proportions of main food shopping trips from residents.

6.10 In addition, Table 6.1 also indicates that the top-up shopping retention rates in each zone are high, with the highest retention levels within the authority area to be found in Zones 4 and 7, where over 80% of top-up shopping trips from residents are to foodstores within the same corresponding zones.

Table 6.1: Zonal Convenience Goods Retention Rates Across the Study Area at 2025

Zone	Main Food Shopping Zonal Retention Rate 2024 (%)	Top-Up Food Shopping Zonal Retention Rate 2024 (%)	Combined Convenience Goods Shopping Zonal Retention Rate (%)
1 – Huddersfield (South)	45.8%	73.8%	52.8%
2 – Huddersfield (North)	66.0%	52.9%	62.8%
3 – Elland and Brighouse	87.7%	91.9%	88.7%
4 – Cleckheaton and Mirfield	74.9%	80.9%	76.4%
5 – Lindley and Marsden	52.8%	62.2%	55.2%
6 – Skelmanthorpe and Netherton	4.4%	50.0%	15.8%
7 – Holmfirth	72.4%	83.9%	75.3%
8 – Dewsbury and Ravensthorpe	69.9%	73.2%	70.8%
9 – Batley and Birstall	71.2%	74.4%	72.0%
10 – Morley	66.3%	84.7%	70.9%

Source: Table 4 of Appendix 4 of this Study for 20254 market shares

6.11 Accordingly, we find that the broad zonal retention rates identified appear to appropriately reflect the geography of current provision. There may well be scope to improve local retention rates subject to provision coming forward in appropriate locations in the future and particularly within Zone 5 which covers Lindley and Marsden.

6.12 The below Table 6.2 provides a different assessment of shopping patterns, this time setting out the proportion of zonal convenience goods expenditure which is claimed by operators located within the authority area.

6.13 Table 6.2 identifies that across the zones which cover the authority area, there is a very high level of expenditure directed towards Kirklees authority convenience facilities for both main food and top-up food shopping. The very strong market share identified across these zones indicates that Kirklees's foodstores are able to meet most main food shopping needs and that there is little reason to travel outside the area to undertake grocery shopping. The lowest figures are found in Zones 3 and 10, which fall outside of the Kirklees authority area.

6.14 Table 6.2 also provides the comparable combined convenience goods market share of the authority area on a zonal basis from 2016. We can see that overall, the retention rates have remained broadly consistent or increased from 2016 to 2025, indicating that Kirklees' convenience destinations have continued to meet the needs of residents within the authority area. The biggest decrease can be seen for Zone 2 residents, but even taking that into account, the retention rate is still above 91% at 2025, which is considered to be good.

Table 6.2: Kirklees Convenience Goods Market Share by Zone at 2025

Zone	Main Food Shopping Kirklees Market Share 2025 (%)	Top-Up Food Shopping Trips Kirklees Market Share 2025 (%)	Combined Convenience Goods Kirklees Market Share 2025 (%)	Combined Convenience Goods Kirklees Market Share 2016 (%)
1 – Huddersfield (south)	96.7%	98.9%	97.2%	98.4%
2 – Huddersfield (north)	91.1%	93.3%	91.6%	97.7%
3 – Elland and Brighouse	9.0%	3.3%	7.6%	19.9%
4 – Cleckheaton and Mirfield	88.2%	96.4%	90.3%	86.6%
5 – Lindley and Marsden	97.3%	97.3%	97.3%	94.1%
6 – Skelmanthorpe and Netherton	72.5%	84.8%	75.5%	72.8%
7 – Holmfirth	95.8%	94.5%	95.4%	91.9%
8 – Dewsbury and Ravensthorpe	89.9%	92.4%	90.5%	91.9%
9 – Batley and Birstall	89.4%	93.2%	90.4%	76.4%
10 – Morley	8.5%	5.8%	7.9%	13.5%
Total Study Area	**65.3%**	**67.3%**	**64.8%**	**67.0%**

Source: Table 4 of Appendix 4 of this Study for 2025 market shares

Comparison Goods Market Share

6.15 The below Table 6.4 identifies comparison goods shopping patterns, relating to the proportion of zonal comparison goods expenditure which is claimed by operators located within the authority area.

6.16 In practice, Kirklees's operators claim more than five out of every ten pounds originating within all of the zones except Zones 3 and 10, which fall outside of the Kirklees authority area. The highest proportion of expenditure spent at Kirklees's destinations is recorded in Zones 1, 2, 5 and 7 where over seven of every ten pounds is spent at Kirklees destinations.

6.17 The principal destination for Zones 1, 2 and 5 residents is Huddersfield town centre. For Zone 7 residents, both Huddersfield town centre and Holmfirth district centre are the principal destinations.

Table 6.3: Kirklees Comparison Goods Market Share by Zone at 2025

Zone	Comparison Goods Kirklees Market Share 2025 (%)	Comparison Goods Kirklees Market Share 2016 (%)
1 – Huddersfield (south)	85.2%	85.4%
2 – Huddersfield (north)	77.3%	87.4%
3 – Elland and Brighouse	24.5%	32.6%
4 – Cleckheaton and Mirfield	71.6%	68.2%
5 – Lindley and Marsden	81.1%	87.3%
6 – Skelmanthorpe and Netherton	53.9%	58.6%
7 – Holmfirth	75.0%	77.8%
8 – Dewsbury and Ravensthorpe	69.1%	70.7%
9 – Batley and Birstall	71.3%	65.3%
10 – Morley	19.7%	26.8%
Authority Area	**56.7%**	**60.9%**

Source: Table 4 of Appendix 4 of this Study for 2025 market shares

6.18 In addition to the 2025 comparison goods market share, Table 6.3 also provides the comparable figures for each zone from the 2016 Study. We can see from Table 6., that within each zone except Zones 4 and 9, the proportion of comparison goods expenditure which was being spent at Kirklees destinations has reduced between 2016 and 2025, with the highest percentage point decrease being for Zone 2 residents.

6.19 Table 6.4 identifies the market share of expenditure attracted to the principal comparison goods destinations for Study Area residents. The table indicates that Huddersfield town centre is the dominant comparison goods shopping destination for Study Area residents. Across the Study Area, the destination attracts 11.3% of Study Area comparison goods expenditure, and a market share of more than 30.0% of comparison goods expenditure which originates within each of Zones 1 and 5, and more than 20.0% from Zone 2 residents. In this regard, a higher proportion of Zone 2 residents are now choosing to visit Leeds city centre and White Rose Shopping Centre to meet their overarching comparison shopping needs.

6.20 However, the increase in comparison expenditure retention in Zones 4 and 9 is a positive indicator in terms of Kirklees authority's comparison goods destinations, although the principal reason the proportion has increased is due to the respective increased attraction of Birstall Shopping Park, a prime out of centre destination.

6.21 The second most popular destination is Birstall Shopping Park, which secures 6.4% of all comparison goods expenditure which originates within the Study Area, followed by Great Northern Retail Park which secures 3.9%.

6.22 The identified market shares are generally encouraging and are reflective of the fact that a good number of day-to-day comparison goods can be sourced close to home.

Table 6.4: Performance of Comparison Goods Floorspace at Key Destinations at 2025

Zone	Destination	Zone 1 2025 (%)	Zone 2 2025 (%)	Zone 3 2025 (%)	Zone 4 2025 (%)	Zone 5 2025 (%)	Zone 6 2025 (%)	Zone 7 2025 (%)	Zone 8 2025 (%)	Zone 9 2025 (%)	Zone 10 2025 (%)	Total 2025 (%)
1	Huddersfield town centre	36.2%	26.2%	9.1%	3.7%	31.7%	10.2%	11.0%	0.5%	0.0%	0.1%	**11.3%**
9	Birstall Shopping Park	0.7%	2.1%	1.4%	16.7%	1.0%	1.1%	1.5%	8.2%	12.8%	10.1%	**6.4%**
	Great Northern Retail Park	9.2%	6.7%	2.3%	1.4%	8.1%	11.5%	5.6%	0.3%	0.1%	0.0%	**3.9%**
	Leeds Road Retail Park	8.0%	9.2%	2.1%	2.1%	11.0%	2.9%	8.6%	0.2%	0.0%	0.0%	**3.8%**
	Dewsbury town centre	0.0%	0.0%	0.0%	4.7%	0.1%	0.6%	0.0%	23.7%	5.9%	0.3%	**3.0%**
	Batley town centre	0.0%	0.8%	0.9%	1.6%	0.0%	0.2%	0.8%	2.6%	30.7%	0.7%	**2.6%**
	Junction 27 Retail Park	0.1%	0.5%	1.7%	5.7%	0.2%	0.0%	0.6%	2.9%	7.5%	4.0%	**2.6%**
OSA												
	Leeds City Centre	1.5%	5.1%	0.7%	7.2%	0.8%	3.5%	2.4%	7.2%	8.1%	14.2%	**6.4%**
	White Rose Shopping Centre	0.4%	2.7%	1.9%	5.2%	2.8%	0.5%	0.2%	11.1%	7.6%	12.2%	**5.6%**

Source: Table 5 of Appendix 4
Notes: The above summary table provides details of the trading performance of key comparison operators in the Study Area

Market Share Summary and Identification of Expenditure Claimed by Kirklees Retailers

6.23 We identify the convenience goods, comparison goods, and overall market share of Study Area expenditure claimed by retailers located in Kirklees in the below Table 6.5.

6.24 Kirklees's convenience goods market share of 65.0% is higher than its comparison goods market share of 56.7%. This demonstrates that the authority area's convenience destinations are playing a more localised role in meeting residents' needs and that residents are in part, choosing to shop further afield for comparison goods.

Table 6.5: Comparison Goods Expenditure Retention and Leakage

Type of Expenditure	2025 Residents' Expenditure (£m)	2025 Market Share (%)
Study Area Convenience Goods Expenditure	£1,019.8m	65.0%
Study Area Comparison Goods Expenditure	£1,031.2m	56.7%
Total Study Area Expenditure	**£2,051.0m**	**60.6%**

Source: Table 25 of Appendix 4
Note: Both presented in a consistent 2023 Prices

6.25 In conclusion, the household survey demonstrates that overall, Kirklees's convenience goods retailers are able to appropriately serve residents of the authority area and those who live in a wider catchment area.

6.26 In respect of comparison goods, Kirklees's retailers both within the town centres and at the out of centre facilities provide a good range of operators and attract relatively high levels of expenditure from the key central zones of the Study Area.

6.27 In our view, the identified survey results reflect the geography of the Study Area and the relative attraction of other nearby retail venues. Accordingly, where expenditure 'leaks' to destinations outside of Kirklees this is still generally reflective of logical and sustainable travel patterns.

7. Assessment of Retail Capacity

7.1 Our retail capacity tables set out our step-by-step approach to estimating the expenditure surplus which is available to support additional retail floorspace and are provided at Appendix 4. A summary of our methodology, together with our findings, is provided below.

General Approach to Estimating Quantitative Capacity

7.2 Retail capacity modelling follows the basic principle that:

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

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

Methodology

7.4 We turn first to a description of the methodology we have employed in assessing quantitative need in both the comparison and convenience goods sectors in the period up to 2043. It is important to recognise, however, that the effects of expenditure growth over time become exponential. Thus, in looking to the period beyond 2035, the Council should adopt a plan, monitor and manage approach, so as to ensure that the forecast floorspace requirements are kept in line with changes in expenditure and changing methods of retailing.

7.5 There is no detailed guidance as to how to assess the quantitative need for retail development in the NPPF, or in the PPG. As a consequence, we have applied an eight step approach which has been tested at Examination

7.6 The eight broad steps to calculating the quantitative need are as follows:

i) The first step is to establish the appropriate overall retail catchment area for the hierarchy of centres in Kirklees, which is shown at Appendix 1. This catchment area covers the whole of the administrative area of Kirklees, together with parts of the surrounding administrative areas.

ii) The second step is to assess the existing level of population and the existing volume of retail expenditure of those who reside within the overall catchment area.

iii) The third step is to establish where the retail expenditure of residents of the overall catchment area is currently spent, through the use of an empirical telephone survey of households and thereby establish the proportion of the retail expenditure of catchment area residents which is currently retained by town centres, retail parks and freestanding stores located within the overall catchment area – that is the aggregate retention rate within the district.

iv) The fourth step is to apply forecasts of population change and per capita expenditure change, so as to establish the overall level of projected growth in expenditure for residents of the overall catchment area, and an assessment of growth in retained expenditure, based, initially, on a constant retention scenario.

v) The fifth step is to make an allowance for growth in inflows of expenditure into the catchment area from those who reside outside in the catchment area. This can be achieved through the analysis of retail studies of adjacent authority areas .

vi) The sixth step is to make an allowance for under-trading, or over-trading in the base year, but only if this is justified on the basis of the clear empirical evidence.

vii) The growth in retained expenditure (step iv), is added to the growth in inflows (step v), and an allowance for under / over-trading (step vi), so as to derive an initial expenditure surplus. Thus, the seventh step is to make allowance for 'claims' on the initial expenditure surplus, as a result of:

- Floorspace Efficiency Change for Existing Retailers (growth over time in turnover per sq. m sales area).
- Growth Over Time in Special Forms Of Trading (SFT), which we derive from the final two columns of Figure 5 of Experian's Retail Planner Briefing Note 22 of March 2025.
- Planning Commitments, for which information has been provided by Kirklees Council and neighbouring authorities

viii) The culmination of steps i) to vii) is the calculation of the residual expenditure pot which is potentially available for new retail floorspace, under a constant retention assumption. Thus, the final step, where appropriate, is to develop alternative scenarios for calculating growth in residual expenditure, based on:

- increases or decreases in the projected retention level; and
- sensitivity testing of key assumptions, such as projected population change.

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

7.8 As a consequence, we adopt the position for comparison goods floorspace that it is trading 'at equilibrium' at base year 2025 (i.e. our survey-derived turnover estimate effectively acts as benchmark). This is a standard industry approach.

Future Quantitative Convenience Goods Capacity

7.9 In identifying the requirement for additional convenience goods floorspace, the estimated turnover of the existing collective provision (with reference to the shopping patterns established by the household survey) is compared to its benchmark turnover (calculated with reference to company average sales densities and the net convenience goods sales areas of individual stores). The identified benchmark turnover changes across future reporting years to account for Experian's forecasts in respect of the future sales efficiency of convenience goods floorspace).

7.10 As Table 7.1 demonstrates, convenience goods floorspace across the authority area has a survey-derived turnover of £1,019.8m and an expected benchmark turnover of £913.6m. Once inflow is taken into account, we estimate that the available expenditure used to support convenience facilities within the authority area increases to £1,040.2m

7.11 As a consequence, a convenience expenditure surplus of £126.6m is identified at 2025, which decreases gradually across the plan period. By 2043, we estimate a surplus in expenditure amounting to £108.3m.

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

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Inflow (£m)	Surplus Expenditure (£m)
2025	913.6	1,019.8	20.4	126.6
2030	913.6	1,005.9	20.1	112.4
2035	909.9	999.5	20.0	109.6
2040	905.4	994.2	19.9	108.7
2043	902.7	991.2	19.8	108.3

Source: Table 6a of Appendix 4
Notes: Assumes constant market share (65.0%) of Study Area expenditure claimed by facilities within Kirklees authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 4b of Experian Retail Planner Briefing Note 22; in 2023 prices.

7.12 We have identified four convenience commitments within the authority area which need to be taken into account in calculating the level of surplus expenditure. In each case, these commitments, whilst not built out or completed yet, will go some way to absorbing the surplus expenditure identified.

7.13 The four commitments comprise the proposed foodstores at the former Kirklees College site, the proposed foodstore at Crosland Moor, the former Spotted Cow Pub site and at land off Bankwood Way in Batley. The proposal at Bankwood Way also includes the provision of a Home Bargains store, which has been taken into account in the quantitative assessment. The total convenience turnover of the three foodstores is estimated to be £45.8m at 2025.

7.14 Table 7.2 identifies a monetary surplus across the plan period. In practice, our assessment suggests that there will be effectively a quantitative undersupply of floorspace (equating to between 6,400 sq.m and 8,100 sq.m of convenience goods floorspace at 2025). By 2035, we estimate that will be capacity which could support between 5,000 and 6,400 sq.m of additional convenience goods floorspace.

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

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement Minimum (sq.m)	Floorspace Requirement Minimum (sq.m)
2025	126.6	45.8	80.8	6,400	8,100
2030	112.4	45.8	66.6	5,200	6,700
2035	109.6	45.7	63.9	5,000	6,500
2040	108.7	45.4	63.3	5,000	6,400
2043	108.3	45.3	63.1	5,000	6,400

Source: Table 6d of Appendix 4
Notes: Assumes constant market share 65.0%) of Study Area expenditure claimed by facilities within Kirklees authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 4a of Experian Retail Planner Briefing Note 22; in 2023 prices

Future Quantitative Comparison Goods Capacity

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

7.16 As identified by the below Table 7.3, our assessment estimates that the comparison goods turnover of the authority area at 2025 is £914.5m, or £1,005.9m after account is taken of inflow.

7.17 Experian anticipates that improvements in the sales efficiency of existing comparison goods floorspace will outstrip per capita comparison goods expenditure growth in the very short term. As such, no surplus in comparison expenditure is identified in the short or medium term. By 2043, a surplus of £18.2m is identified across the authority area.

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

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Inflow (£m)	Surplus Expenditure (£m)
2025	1,134.3	1,031.2	103.1	0.0
2030	1,262.2	1,135.6	113.6	-13.1
2035	1,414.2	1,275.9	127.6	-10.7
2040	1,584.5	1,427.8	142.8	-13.9
2043	1,658.2	1,524.0	152.4	18.2

Source: Table 26a of Appendix 4
Notes: Assumes constant market share (56.7%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 4b of Experian Retail Planner Briefing Note 22; in 2023 prices

7.18 Once more, we have identified four commitments within the authority area which have been taken into account as part of the comparison quantitative assessment. The estimated turnover of the comparison commitments total in £11.7m.

7.19 Table 7.4 converts this into a comparison floorspace requirement across the plan period. As Table 7.6 shows, once commitments have been taken into account, there is a deficit of comparison floorspace requirement (or an oversupply of comparison floorspace) across the authority area until 2043, when a minimal capacity of 100 sq.m is identified.

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

Year	Surplus (£m)	Commitments (£m)	Residual (£m)	Floorspace Requirement Minimum (sq.m)	Floorspace Requirement Minimum (sq.m)
2025	0.0	11.7	-11.7	-1,900	-3,300
2030	-13.1	13.0	-26.0	-3,900	-6,700
2035	-10.7	14.5	-25.3	-3,400	-5,800
2040	-13.9	16.3	-30.2	-3,600	-6,200
2043	18.2	17.4	0.8	100	100

Source: Table 26d of Appendix 4
Notes: Assumes constant market share (56.7%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Table 4a of Experian Retail Planner Briefing Note 22; minimum floorspace requirement based on an assumed sales density of £6,000 per sq.m at 2025; maximum floorspace requirement based on an assumed sales density of £3,500 per sq.m at 2025; in 2023 prices

Convenience and Comparison Qualitative Requirements

7.20 We note that most foodstore formats are provided across the Kirklees authority area, with Asda, Sainsbury's, Morrisons and Tesco all occupying large format stores; and the likes of Co-op, One Stop, Sainsbury's and Tesco trading from smaller local convenience store formats. Marks and Spencer also provides for residents within the authority area.

7.21 The authority area also includes representation from a number of discount supermarkets operated by Aldi and Lidl.

7.22 As set out above, we have identified a convenience quantitative capacity within the authority area, but not a comparison quantitative capacity. On this basis, it is also useful to consider whether there is a qualitative deficiency of retail provision within the authority area, and whereabouts in particular this qualitative need might be directed to.

7.23 Looking at the performance of stores across Kirklees, it is clear that the stores within Zones 1, 6, 8 and 9 are either performing broadly at benchmark, or below. In these cases therefore, it is generally considered that there are sufficient convenience facilities to meet the needs of residents. However, within Zones 2 (north Huddersfield), 4 (Cleckheaton), 5 (Marsden/Lindley) and 7 (Holmfirth), there are a number of stores which are identified as overtrading and therefore an indication that there may be an overarching undersupply of convenience provision within these areas in particular.

7.24 We do note that there are four commitments for new foodstores across the authority area which will go some way to meeting the qualitative gaps within Kirklees. This is particularly the case in terms of Huddersfield and Batley where the commitments will help to provide further choice for residents within those catchments, and potentially even out some of the over-trading from existing stores.

7.25 However, there is still an apparent gap in provision within both Holmfirth and the Marsden and Slaithwaite areas. We have explored development opportunities within or on the edge of the defined centres and have not identified any appropriate sites which would be suitable to accommodate new foodstores. As such, we do not recommend the allocation of sites to accommodate the identified need and that instead, any proposals should be assessed on their own merit in accordance with local and national planning policies. In each case, consideration needs to be given to the potential impact of future proposals on the overarching vitality and viability of defined centres.

7.26 Turning to the qualitative need for additional comparison goods floorspace, we do not identify any specific areas within the authority area for comparison floorspace growth. Although we do note that there are some levels of expenditure 'leaking' to larger comparison shopping destinations outside of the authority area, including Leeds city centre, the offer of principal centres within Kirklees are going someway to meeting the needs of residents. Furthermore, Kirklees benefits from key out-of-centre destinations which provide for a range of comparison retailers which also meet the needs of residents.

7.27 We would also stress that, in accordance with national planning policy and guidance, applications for retail developments above the locally set threshold (which we go on to consider below) and outside of the designated town centre boundaries would need to be considered in accordance with the sequential approach and retail impact assessment methodology.

7.28 The above should all be considered taking account of potential evolving market trends and the need to provide sufficient flexibility in defined centres to allow for future investment opportunities. On this basis, planning policy will need to be sufficiently flexible to allow for town centre development which will benefit the wider offer and vitality and viability of the centres in the future.

8. Assessment of Leisure Capacity

8.1 Our approach in considering leisure capacity is in two parts.

8.2 For food and beverage floorspace, we adopt a similar approach as to that set out in respect of retail floorspace in the preceding Section 6 of this report. For large format commercial uses, we adopt a 'benchmarking' approach where we consider the typical population required to support different types of facilities.

8.3 The benchmarking exercise reflects the fact that large format commercial uses are relatively limited in number and residents may be prepared to travel to watch a film or to go ten pin bowling. The current Study Area market share may not be instructive in respect of identifying future large format leisure requirements and therefore our preference is to undertake a benchmarking exercise.

Participation Rates

8.4 We begin by looking at the participation rates of each principal leisure activity across the 10 zones of the Study Area. The household survey enables us to see which leisure activities residents of Kirklees typically participate in and which are the most popular across the 10 zones. Table 8.1 below provides the participation rates on a zonal basis.

Table 8.1: Participation Rates by Zone

Leisure Activity	T'tal	1	2	3	4	5	6	7	8	9	10
Eating out	58.16%	68.04%	62.07%	72.92%	47.31%	66.76%	60.55%	80.50%	53.24%	58.19%	45.49%
Pub / bars / nightclubs / social club	46.40%	48.89%	43.69%	52.38%	46.20%	54.04%	58.48%	50.82%	29.19%	25.50%	51.60%
Theatres / concert halls / museums / art galleries / music venue / arenas and other cultural facilities	34.32%	32.96%	32.61%	40.32%	33.60%	37.54%	45.75%	55.97%	14.82%	23.23%	36.24%
Cinema	28.34%	28.44%	35.16%	33.76%	21.75%	28.65%	29.30%	23.18%	28.13%	27.64%	28.11%
Indoor sports or health and fitness activity	20.71%	27.32%	20.53%	20.58%	16.52%	27.69%	31.26%	16.58%	17.89%	25.77%	15.23%
Other competitive social activities such as crazy / indoor golf, escape rooms, pool / snooker etc.	9.11%	3.11%	5.07%	7.78%	8.58%	15.06%	12.62%	7.77%	10.77%	8.33%	10.38%
Ten pin bowling	7.91%	7.29%	9.32%	9.66%	8.07%	7.06%	6.77%	4.93%	16.21%	12.73%	2.82%
Bingo	4.24%	3.19%	7.82%	2.48%	7.80%	4.15%	0.40%	1.57%	3.13%	0.74%	5.36%
Casino	0.73%	1.75%	0.00%	0.00%	0.18%	1.64%	3.28%	0.52%	0.00%	1.33%	0.27%

8.5 Table 8.1 is clear that the most popular leisure activity across all of the 10 zones is 'eating out', followed by 'pubs/bars/nightclubs/social clubs'. In addition, visiting theatres, the cinema and indoor sports or health and fitness activities are also popular leisure activities.

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

Food and Beverage Requirements

Leisure Expenditure Growth

8.7 To calculate per capita food and beverage expenditure, we have again utilised Experian Micromarketer G3 data. The base year for this expenditure data is also 2022. Experian provides separate per capita expenditure estimates on a zonal basis for 'restaurant and café meals per person' and 'alcoholic drinks (away from home) per person'.

8.8 There is no need to make allowance for special forms of trading expenditure (given that all food and beverage expenditure identified by Experian relates to eating and drinking in bars, pubs, cafes, and restaurants).

8.9 ERPBN21 provides annual leisure expenditure growth forecasts which we set out at the below Table 8.2. These growth rates are used to estimate increases in per capita food and beverage expenditure across the plan period to 2040.

Table 8.2: Experian Retail Planner Briefing Note 22 Leisure Expenditure Annual Per Capita Growth Rates

Year	Leisure Per Capita Annual Growth
2023	-2.9%
2024	-1.6%
2025	0.0%
2027-31	0.6%
2032-40	0.7%

Source: Figure 1a of Appendix 3 of Experian Retail Planner Briefing Note 22 (March 2025)

8.10 We again recognise that growth in expenditure forecasts in the longer-term should be treated with caution given the difficulties in predicting economic performance over such an extensive timeframe.

8.11 Accepting this caveat, we are able to use Experian's recommendations in respect of annual expenditure growth to calculate expenditure across the food and beverage sectors at 2025, 2029, 2034, 2039 and 2043.

Restaurant and Café Floorspace Requirements

8.12 Based on the assumed Study Area resident population and the available per capita restaurant and café expenditure, we estimate that £452.0m of such expenditure originates within the Study Area at 2025.

8.13 The below Table 8.3 indicates that available Study Area restaurant and café expenditure is forecast to increase to £526.0m at 2043.

Table 8.3: Total Available Study Area Restaurant and Café Expenditure

2025 (£m)	2030 (£m)	2035 (£m)	2040 (£m)	2043 (£m)
452.0	469.5	490.3	512.3	526.0

Source: Table 2 of Appendix 5
Note: In 2023 prices

8.14 Table 8.4 indicates that this represents an increase of £74.0m (or 16.4%) across the Study Area between 2025 and 2043.

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

Growth 2025-43 (£m)
74.0

Source: Table 2 of Appendix 5
Note: In 2023 prices

8.15 Our methodology accounts for the fact that existing operators will look to increase their turnover going forward to remain viable. On this basis, we identify an expenditure surplus of £8.9m at 2030. Due to subsequent expenditure and population increases, this surplus increases to £19.2m at 2035.

8.16 As with retail capacity, this monetary surplus can be converted into a floorspace requirement. The average sales density of UK floorspace was around £8,584 per sq.m at 2025.[17]

8.17 Based on this sales density (and allowing for future increases in the sales efficiency of leisure floorspace going forward), we estimate that 1,000 sq.m of additional café and restaurant floorspace could be supported at 2030, increasing to 2,200 sq.m at 2035.

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

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Exp. With 5% Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq.m)
2025	249.9	237.4	249.9	0.0	0
2030	250.7	246.6	259.6	8.9	1,000
2035	251.9	257.5	271.1	19.2	2,200
2040	253.2	269.1	283.3	30.1	3,500
2043	253.7	276.3	290.8	37.2	4,300

Source: Table 5a and Table 5b of Appendix 5
Notes: Assumes constant market share (41.6%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 22 - Leisure; in 2023 prices

Licensed Premises Floorspace Requirements

8.18 Based on the assumed Study Area resident population and the available per capita alcoholic drinks expenditure, we estimate that £204.4m of alcoholic beverage expenditure originates within the Study Area at 2025.

8.19 The below Table 8.6 indicates that available Study Area restaurant and café expenditure is forecast to increase to £238.0m at 2043.

Table 8.6: Total Available Study Area Licensed Premises Expenditure

2025 (£m)	2030 (£m)	2035 (£m)	2040 (£m)	2043 (£m)
204.4	212.4	221.8	231.8	238.0

Source: Table 7 of Appendix 5
Note: In 2023 prices

[17] As identified by Figure 2 of Experian Retail Planner Briefing Note 22 – Leisure.

8.20 Table 8.7 indicates that this represents an increase of £33.6m (or 16.4%) across the Study Area between 2025 and 2043.

Table 8.7: Growth in Available Study Area Licensed Premises Expenditure

Growth 2025-43 (£m)
33.6

Source: Table 7 of Appendix 5
Note: In 2023 prices

8.21 Our complete licensed premises quantitative assessment model is provided at Appendix 5 of this Study. Table 10 of Appendix 5 identifies that £124.4m (equating to 57.8%) of Study Area alcoholic drink expenditure is directed to licensed premises in the authority area at 2025. Our methodology accounts for the fact that existing operators will look to increase their turnover going forward to remain viable.

8.22 On this basis, we identify an expenditure surplus of £4.4m at 2030. Due to subsequent expenditure and population increases, the identified surplus increases to £9.5m at 2035.

8.23 Once again, this monetary surplus can be converted into a floorspace requirement. Based on the average UK leisure sales density of £8,584 sq.m at 2024 (and allowing for future increases in the sales efficiency of leisure floorspace going forward), we estimate that 500 sq.m of additional licensed premises floorspace could be supported at 2030, increasing to 1,100 sq.m at 2035.

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

Year	Benchmark Turnover (£m)	Available Expenditure (£m)	Exp. With 5% Inflow (£m)	Surplus Expenditure (£m)	Floorspace Requirement (sq.m)
2025	124.4	118.1	124.4	0.0	0
2030	124.7	122.7	129.2	4.4	500
2035	125.4	128.2	134.9	9.5	1,100
2040	126.0	133.9	141.0	15.0	1,700
2043	126.2	137.5	144.8	18.5	2,100

Source: Table 10a and Table 10b of Appendix 5
Notes: Assumes constant market share (39.0%) of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 22 - Leisure; in 2023 prices

8.24 As we have identified earlier in the Study, there are a number of substantial regeneration schemes coming forward within the centres of Kirklees, and particularly within Huddersfield and Dewsbury. These regeneration schemes provide opportunities to support new leisure uses, which will include the food and drink uses as noted above. As such, the identified capacity in Tables 8.5 and 8.8 above is likely to be absorbed at least in part, by the demand created by these schemes and policy should support this.

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

8.25 Our approach in identifying the potential for large format to the assessment of commercial leisure needs necessarily departs from the above monetary capacity assessment. This is because the commercial leisure sector is different to the retail and food and beverage sectors; large-scale leisure uses are relatively limited in number and customers often expect to travel at least some distance in order to access them. As such, we believe it is sensible to consider the general appropriateness of provision on a Study Area basis, with reference to the typical number of persons required to support particular uses.

8.26 Our assessment considers the typical population required to support bingo halls, casinos, cinema screens and ten pin bowling alleys, and is based around three key stages.

8.27 We firstly calculate the expected Study Area and local authority populations for the relevant reporting years. We then calculate the number of persons required to support a bingo hall, casino, cinema screen and bowling alley nationally, across the UK.

8.28 We then apply the respective ratio to the Study Area population and to the population of the Kirklees authority area to gauge the benchmark level of provision, based on the position evident across the UK.

8.29 We supplement our assessment with an overview of current patterns of commercial leisure trips throughout the Study Area (as identified by the NEMS household survey) to help identify any qualitative deficiencies in provision.

8.30 We recognise that some of these facilities are not as important as they perhaps once were in underpinning the local leisure economy. However, all four uses generally occupy large format premises and, as such, if a requirement were to be identified then there are potential land use implications.

Bingo

8.31 Mintel's March 2019 Casinos and Bingo UK report identifies that there are 350 bingo halls across the UK, which equates to a bingo hall for every 195,377, persons or thereabouts.[18] Accordingly, we estimate that the authority area could theoretically support around 4.7 bingo halls at 2025, the need remaining broadly consistent up to 2043.

8.32 The below Table 8.9 confirms bingo hall capacity within Kirklees over the period to 2043, taking into account the existing large-format provision within the authority area which currently comprises the Mecca Bingo in Huddersfield. There are also a series of smaller-scale informal bingo facilities across the authority area which have not been taken into account in the formal assessment below.

Table 8.9: Bingo Hall Capacity in the Authority Area

Year	Study Area Population	Typical Population Required to Support Hall	Percentage of Population in Kirklees Authority Area	Potential Number of Halls Supported in the Authority Area	Existing Provision	Outstanding Potential Capacity in the Authority Area
2025	629,888	93,000	70.0%	4.7	1	3.7
2030	637,102	93,000	69.9%	4.8	1	3.8
2035	643,465	93,000	69.8%	4.8	1	3.8
2040	650,010	93,000	69.8%	4.9	1	3.9
2043	654,111	93,000	69.9%	4.9	1	3.9

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

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

[18] Based on 2020-Based Population Projections by the Office for National Statistics which identify a UK population of 67,844,000 persons at 2023.

the Mecca Bingo in Huddersfield and in the adjacent authority areas including the Buzz Bingo in Bradford, will be sufficient to meet resident's needs.

Cinemas

8.34 The UK Cinema Association website estimates that there are 4,637 cinema screens in the UK[19], which equates to one screen for every 14,984 persons or thereabouts. On this basis, we estimate that the authority area population could support around 29 cinema screens at 2025, increasing to approximately 31 at 2043.

8.35 There are three existing large-format cinema facilities within the authority area, being the showcase cinema on Gelderd Road in Batley, which has 16 screens, the Odeon on Bradley Mills Road in Huddersfield that has 9 screens and The Light in Huddersfield which has 6 screens. This totals in 31 screens across the three larger format cinemas, along with other smaller-scale ad hoc facilities such as the 'film night' held at St. Lucius Church in Huddersfield.

8.36 As Table 8.10 indicates below, the provision within Kirklees is higher than the identified capacity. Furthermore, residents have good access to additional provision within neighbouring authority areas. Trips to such cinemas are therefore considered to be generally reflective of sustainable travel patterns and many Study Area residents' relative proximity to existing cinemas.

Table 8.10: Cinema Screen Requirement in Authority Area

Year	Study Area Population	Typical Population Required to Support Cinema Screen	Percentage of Population in Kirklees Authority Area	Potential Number of Cinema Screens Supported by Authority Area	Existing Provision (No. of Screens)	Outstanding Potential Capacity in the Authority Area
2025	629,888	14,984	70.0%	29.4	31	-1.6
2030	637,102	14,984	69.9%	29.7	31	-1.3
2035	643,465	14,984	69.8%	30.0	31	-1.0
2040	650,010	14,984	69.8%	30.3	31	-0.7
2043	654,111	14,984	69.9%	30.5	31	-0.5

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

Ten Pin Bowling

8.37 Mintel's Ten Pin Bowling UK 2017 report identifies that there are 5,242 ten pin bowling lanes across the UK, which equates to a bowling lane for every 13,045 persons or thereabouts.

8.38 In this context, there are three formal bowling alley facilities within the authority area, being the UK Super Bowl in Huddersfield which has 14 lanes, The Light which has 9 lanes and the Tenpin facility in Dewsbury which has 24 lanes.

8.39 As Table 8.11 below indicates, there is an identified significant oversupply of ten pin bowling lanes within the authority area.

8.40 Whilst very few new ten-pin bowling alleys were built in the early part of this century, the market has picked up in recent years. However, the upturn in the sector has been driven by smaller facilities which are generally supplemented by a strong food and beverage offer and are located within larger urban centres. We do not

[19] At 2022.

envisage that there will be a strong demand for additional facilities, and again, the amenities in adjacent authority areas will be meeting some of the residents' demands.

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

Year	Study Area Population	Typical Population Required to Support Bowling Lane	Percentage of Population in Kirklees Authority Area	Potential Number of Bowling Lanes Supported by the Authority Area	Existing Provision (No. of Bowling Lanes)	Outstanding Potential Capacity in the Authority Area
2025	629,888	12,000	70.0%	36.7	47	-10.3
2030	637,102	12,000	69.9%	37.1	47	-9.9
2035	643,465	12,000	69.8%	37.5	47	-9.6
2040	650,010	12,000	69.8%	37.8	47	-9.2
2043	654,111	12,000	69.9%	38.1	47	-8.9

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

Casinos

8.41 Mintel's Casinos and Bingo UK 2018 report identifies that there are 145 casinos across the UK, which equates to a casino for every 471,600 persons or thereabouts. The authority area has one existing large-format casino being the Grosvenor Casino in Huddersfield.

8.42 Accordingly, we estimate below, that the authority area could not support any additional casino facilities across the authority area. There is therefore no requirement for the Council to plan for a new facility within the new local plan.

Table 8.12: Casino Requirement in the Authority Area

Year	Study Area Population	Typical Population Required to Support a Casino	Percentage or Population in Kirklees Authority Area	Potential Number of Casinos Supported by the Authority Area	Potential Number of Casinos Supported in the Authority Area	Outstanding Potential Capacity in the Authority Area
2025	629,888	469,063	70.0%	0.9	1	-0.1
2030	637,102	469,063	69.9%	0.9	1	-0.1
2035	643,465	469,063	69.8%	1.0	1	0.0
2040	650,010	469,063	69.8%	1.0	1	0.0
2043	654,111	469,063	69.9%	1.0	1	0.0

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

Health and Fitness Centres

8.43 Despite the current uncertainties associated with available household income, the most recent research shows that the UK health and fitness industry is stronger than it has ever been as measured by number of gyms, membership and market value. The State of the Fitness Industry Report 2024, produced by the Leisure Database Company, finds overall, the UK health and fitness industry is performing strongly, with data indicating that member numbers, market value and penetration all surpassing pre-pandemic levels and reaching all-time highs. The report identifies that as of 2024, the number of gym members increased to 10.7m from 10.3m in 2023.

8.44 Gyms and health and fitness facilities of course make an important contribution to the health of the local authority's population across the complete spectrum of ages. The range of operators and brands within the health and fitness sector are now relatively broad, with a number of budget brands topping the market in terms of number of clubs open and who have experienced the most significant growth in recent years. Indeed, Puregym is hoping to add an additional 60-70 gyms to their portfolio by the end of 2025[20].

8.45 Looking across the authority area, there appears to be a good choice of health and fitness facilities, with a number of national multiples, independents and community run gyms and fitness facilities.

8.46 The Table 8.13 below provides the details of the top health and fitness facilities within the authority area.

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

Leisure Activity	T'tal	1	2	3	4	5	6	7	8	9	10
Huddersfield Leisure Centre, Spring Grove Street, Huddersfield, HD1 4BP	16.46%	47.33%	29.42%	0.00%	1.18%	54.01%	0.00%	20.27%	0.00%	0.00%	0.00%
JD Gyms, Bradford Road, Batley, WF17 6HU	12.62%	0.00%	0.00%	0.00%	21.06%	0.00%	0.00%	0.00%	31.12%	58.48%	14.94%
JD Gyms, Folly Hall Mills, St Thomas' Road, Huddersfield, HD1 3LT	5.45%	0.00%	31.55%	0.00%	0.00%	0.00%	22.85%	0.00%	0.00%	0.00%	0.00%
Morley Town Centre	5.18%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	30.08%
Morley Leisure Centre, Queensway, Morley, Leeds, LS27 9JP	4.63%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	5.22%	24.07%
Brighouse Fitness Centre, Woodvale Road, Brighouse, HD6 4AB	4.01%	0.00%	0.00%	19.80%	7.40%	1.34%	0.00%	0.00%	0.00%	0.00%	11.13%
KAL - Batley Sports & Tennis Centre, Windmill Lane, Howden Clough, Batley, WF17 0QD	3.65%	0.00%	0.00%	0.00%	10.80%	0.00%	0.00%	0.00%	14.37%	15.26%	0.00%
KAL - Spen Valley Leisure Centre, Bradford Road, Liversedge, WF15 6LW	3.58%	0.00%	0.00%	0.00%	24.90%	0.00%	0.00%	0.00%	14.70%	0.00%	0.00%
Huddersfield Town Centre	3.01%	6.55%	15.26%	0.00%	0.00%	0.00%	0.00%	13.95%	0.00%	0.00%	0.00%
Big Box Huddersfield, Tandem Industrial Estate, Wakefield Road, Tandem, Huddersfield, HD5 0AL	2.60%	9.02%	6.64%	0.00%	1.18%	5.93%	0.00%	0.00%	0.00%	0.00%	0.00%
KAL - Colne Valley Leisure Centre, New Street, Slaithwaite,	2.51%	10.04%	0.00%	18.00%	0.00%	0.00%	0.00%	3.16%	0.00%	0.00%	0.00%

[20] https://www.puregym.com/blog/uk-fitness-report-gym-statistics/

Leisure Activity	T'tal	1	2	3	4	5	6	7	8	9	10
Huddersfield, HD7 5AB											
Bannatyne Health Club, Paragon Business Village, Wakefield, WF1 2UF	2.49%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	14.46%

8.47 In terms of capacity, the results of the household survey indicate that a total of 20.7% of the population regularly participate in indoor sports or health fitness activities. The results also indicate that facilities within the authority area retain approximately 70.9% of trips.

8.48 The authority area population is estimated to increase by 16,327 people by 2043. Assuming that a similar gym/health club participation level would apply to the new population as has been identified for the Study Area (i.e., 20.7%) this would equate 3,380 potential new gym members over the plan period. Based on average membership levels for major gym operators (2,897 members) and budget gym operators (3,452 members), the anticipated uplift in the population over the period to 2043 could potentially support one additional gym.

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

Other Commercial Leisure

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

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

8.52 Overall, Huddersfield town centre is the principal destination for 'other commercial leisure' facilities within the authority area, which includes break out rooms, axe throwing, shuffleboard and other venues.

8.53 Although the market for such commercial leisure uses is still evolving, and alternative operators may still continue to require new premises across the authority area, these should be assessed on a case-by-case basis, ensuring that such uses are directed towards defined centres in the first instance. This is particularly important given the wider benefits such uses can have in terms of encouraging longer dwell-times and increasing footfall and associated expenditure within centres.

8.54 However, it is noted that opportunities for larger format leisure uses within the defined centres in the Kirklees authority area will be limited due to the average size of the units being small scale and there being limited opportunity to expand the offer in the centres.

8.55 The Town Centres Practice Guidance states at paragraph 012 that the use of the sequential test should recognise that certain town centre uses have particular market and locational requirements, which meant that they may only be accommodated in specific locations. It goes on to state that robust justification will be needed where this is the case. Whilst the guidance does not circumnavigate the need for a robust assessment, it does provide scope for proposals to be situated in alternative non-town centre locations should there be no sequentially preferable locations in centre.

9. Summary, Conclusions and Policy Recommendations

Context

9.1 The principal purpose of the Study is to understand future retail and leisure needs, and to provide policy recommendations to assist the Council in its preparation of the forthcoming Local Plan.

9.2 The Local Plan will set out the Council's strategy in respect of delivering new future growth in respect of a range of new developments, including housing, jobs, and main town centre uses. To ensure that commercial uses are delivered in sustainable locations, the Local Plan will provide up to date policies in respect of town centre boundaries, the hierarchy of defined centres, and local impact thresholds of relevance to retail and leisure developments.

9.3 This concluding section of our report summarises the key findings of the Study and addresses planning policy requirements of relevance to retail, leisure, and town centres.

Key Findings: Retail

Quantitative and Qualitative Capacity

9.4 As identified at Section 7, we identify a surplus capacity which could support additional convenience good floorspace across the authority area. In reality, this surplus convenience capacity could accommodate around two medium scale foodstores across the authority area, on top of the four commitments already identified and taken into account.

9.5 In terms of the comparison capacity, the Study does not estimate a capacity until 2043, indicating that across the authority area, there is currently an oversupply of comparison goods floorspace. At 2043, a very minimal comparison goods capacity of 100 sq.m is identified which is not at a level which should be planned for within the local plan.

9.6 The capacity findings are based on an assumption that the market share attracted to existing facilities both within the authority area and the town centre remains consistent across the plan period.

Table 9.1: Quantitative Capacity for Convenience Goods and Comparison Goods Floorspace in the Kirklees Authority Area

Year	Convenience Goods	Floorspace Requirement	Comparison Goods	Floorspace Requirement
	Minimum (sq.m)	Maximum (sq.m)	Minimum (sq.m)	Maximum (sq.m)
2025	6,400	8,100	-1,900	-3,300
2030	5,200	6,700	-3,900	-6,700
2035	5,000	6,500	-3,400	-5,800
2040	5,000	6,400	-3,600	-6,200
2043	5,000	6,400	100	100

Source: Table 6d and 26d of Appendix 4
Note: In 2023 prices

9.7 We note that most foodstore formats are provided across the Kirklees authority area, with Asda, Sainsbury's, Morrisons and Tesco all occupying large format stores; and the likes of Co-op, One Stop, Sainsbury's and Tesco trading from smaller local convenience store formats. Marks and Spencer also provides for residents within the authority area. The authority area also includes representation from a number of discount supermarkets operated by Aldi and Lidl.

9.8 As set out above, we have identified a convenience quantitative capacity within the authority area, but not a comparison quantitative capacity. On this basis, it is also useful to consider whether there is a qualitative deficiency of retail provision within the authority area, and whereabouts in particular this qualitative need might be directed to.

9.9 Looking at the performance of stores across Kirklees, it is clear that the stores within Zones 1, 6, 8 and 9 are either performing broadly at benchmark, or below. In these cases therefore, it is generally considered that there are sufficient convenience facilities to meet the needs of residents. However, within Zones 2 (north Huddersfield), 4 (Cleckheaton), 5 (Marsden/Lindley) and 7 (Holmfirth), there are a number of stores which are identified as overtrading and therefore an indication that there may be an overarching undersupply of convenience provision within these areas in particular.

9.10 We do note that there are four commitments for new foodstores across the authority area which will go some way to meeting the qualitative gaps within Kirklees. This is particularly the case in terms of Huddersfield and Batley where the commitments will help to provide further choice for residents within those catchments, and potentially even out some of the over-trading from existing stores.

9.11 However, there is still an apparent gap in provision within both Holmfirth and the Marsden and Slaithwaite areas. We have explored development opportunities within or on the edge of the defined centres and have not identified any appropriate sites which would be suitable to accommodate new foodstores. As such, we do not recommend the allocation of sites to accommodate the identified need and that instead, any proposals should be assessed on their own merit in accordance with local and national planning policies. In each case, consideration needs to be given to the potential impact of future proposals on the overarching vitality and viability of defined centres.

9.12 Turning to the qualitative need for additional comparison goods floorspace, we do not identify any specific areas within the authority area for comparison floorspace growth. Although we do note that there are some levels of expenditure 'leaking' to larger comparison shopping destinations outside of the authority area, including Leeds city centre, the offer of principal centres within Kirklees are going someway to meeting the needs of residents. Furthermore, Kirklees benefits from key out-of-centre destinations which provide for a range of comparison retailers which also meet the needs of residents.

9.13 We would also stress that, in accordance with national planning policy and guidance, applications for retail developments above the locally set threshold (which we go on to consider below) and outside of the designated town centre boundaries would need to be considered in accordance with the sequential approach and retail impact assessment methodology.

9.14 The above should all be considered taking account of potential evolving market trends and the need to provide sufficient flexibility in defined centres to allow for future investment opportunities. On this basis, planning policy will need to be sufficiently flexible to allow for town centre development which will benefit the wider offer and vitality and viability of the centres in the future.

Key Findings: Commercial Leisure

9.15 Our assessment of future leisure needs is in two parts.

9.16 In terms of food and beverage floorspace, we have undertaken a quantitative assessment which identifies available expenditure and takes account of the need for existing businesses to increase their turnover to remain viable.

9.17 Our assessment has identified that at 2035 (the ten year period as advocated by the NPPF) there is a requirement for 1,000 sq.m of restaurant and café floorspace and for 500 sq.m of licensed premises floorspace (this equating to a total of 1,500 sq.m of food and beverage floorspace).

9.18 We anticipate that this floorspace will comprise of relatively small-scale cafés, restaurants and bars which would generally be accommodated within the principal centres. We recommend that this floorspace requirement is directed towards Kirklees's defined centres in order to secure the re-use and repurposing of vacant floorspace.

Table 9.2: Quantitative Capacity for Restaurant and Café Floorspace and Licensed Premises Floorspace in the Authority Area

Year	Restaurant and Café Floorspace Requirement (sq.m)	Licensed Premises Floorspace Requirement (sq.m)	Total Food and Beverage Floorspace Requirement (sq.m)
2025	0	0	0
2030	1,000	500	1,500
2035	2,200	1,100	3,300
2040	3,500	1,700	5,200
2043	4,300	2,100	6,400

Source: Tables 5a, 5b, 10a and 10b of Appendix 5
Note: Assumes constant market share of Study Area expenditure claimed by facilities in the authority area; allows for changes in benchmark turnover sales efficiency in accordance with Figure 2 of Experian Retail Planner Briefing Note 22 - Leisure; in 2023 prices

9.19 This has identified quantitative capacity which equates to a requirement across the authority area at 2043 for:

- 3.9 bingo halls;
- -0.5 cinema screen;
- -8.9 ten pin bowling lanes; and
- 0.0 casinos.

9.20 We do not anticipate there to be operator demand to bring forward larger format leisure uses in the authority area over the plan period to 2043.

Future Retail and Centres Strategy

9.21 The provision of main food shopping destinations within and around defined centres is a key strength of centres across the authority area and the benefit of retaining this should be given substantial weight when considering future convenience goods retail proposals.

9.22 In terms of service sectors, financial and business transactions have increasingly moved online and 'bricks and mortar' financial service provision has significantly reduced as a consequence. This trend will not be reversed. It

will be important to ensure that premises previously put to such use are repurposed and brought back into active use. By way of example, former bank and building society premises can often be made into attractive bars and restaurants which are able to enhance a centre's wider offer (including the evening economy).

9.23 Whilst the economic picture is currently challenging for hospitality operators, we consider that further potential exists to expand the leisure sector offer within the authority's principal centres across the medium to longer term and the assessment undertaken to support this Study confirms that there is a capacity for additional food and beverage floorspace across the authority area.

9.24 It is highly unlikely that there will be substantial comparison goods retail development coming forward within the local authority area across the plan period. In practice, some such in-centre retailers may close. This could open up town centre space for convenience retailers, and for the growth of the leisure and retail service sectors.

9.25 In particular, food and drink operators are a critical component of a modern town centre, and the future success of these operators is inextricably linked to the centres' overall vitality. Improved local leisure provision will mean a reduced need to travel further afield to eat, drink and socialise. This reduces carbon emissions and accords with sustainable development principles (particularly as a rounded retail and service offer should encourage linked trips and reduced travel).

9.26 The diversification of the key town centres within the authority area will ensure that they continue to meet the needs of residents and visitors alike, and therefore protecting their vitality and viability in the future. The pragmatic approaches adopted by the Council and other key stakeholders within the defined centres

Meeting Retail Needs

9.27 The retail capacity assessment has not identified any material quantitative capacity for comparison floorspace within the authority area across the plan period. The Study does however identify a capacity for additional convenience floorspace within the authority area.

9.28 While the out-of-centre retail parks contribute to meeting some of the comparison goods needs of the District's residents, we consider that there is no requirement to develop any further facilities outside of defined centres.

9.29 It will therefore be important to continue to encourage non-bulky comparison retailing, in particular, within the town centres in order to protect and enhance its role as a shopping destination that meets the day-to-day needs of its local residents.

9.30 However, we do not recommend that the Council allocates any sites within the defined centres to accommodate additional floorspace within the local plan and that instead, planning policy should be focused on ensuring that new retail and leisure developments are directed to the defined centres in the first instance.

Meeting Commercial Leisure Needs

9.31 As Section 8 demonstrates, we do not identify any capacity for large format leisure floorspace within the authority area. We do, however, identify a floorspace capacity for restaurants, cafés and other licenced premises but this is not at a level which we consider should be reflected in policy.

9.32 In this regard, the quantum of floorspace identified is less than the total quantum of vacant floorspace identified across the authority area's principal centres. Accordingly, we recommend that this floorspace requirement is directed towards the defined centres in order to secure the re-use and repurposing of vacant floorspace.

9.33 Commercial leisure continues to be an important element of the overarching offer of centres and is one of the key attractors which draws in footfall both during the daytime and evening.

9.34 Therefore, a recognition that such uses play an important role in helping to support the future vitality and viability of centres should be included in planning policy.

9.35 There has also been a growth in recent years in other more specialist commercial leisure attractions, including facilities such as trampoline parks, indoor soft play centres, ninja courses and a range of competitive social destinations. Calculating a quantitative need for such uses is not possible, particularly given the evolving market and relative infancy of such uses. However, we are able to review the existing offer and consider whether there may be a qualitative requirement to increase the offer across the authority area.

9.36 Overall, the authority area itself is generally not well catered for in terms of wider commercial leisure uses, and instead, residents will be looking to surrounding higher-order centres, particularly Leeds city centre, to meet their commercial leisure needs in this context. Although the market for such commercial leisure uses is still evolving, and alternative operators may still continue to require new premises across the authority area, these should be assessed on a case-by-case basis, ensuring that such uses are directed towards defined centres in the first instance. This is particularly important given the wider benefits such uses can have in terms of encouraging longer dwell-times and increasing footfall and associated expenditure within centres.

9.37 However, it is noted that opportunities for larger format leisure uses within the smaller defined centres in the Kirklees authority area will be limited due to the average size of the units being small scale and there being limited opportunity to expand the offer in the centres.

9.38 As we have identified earlier in the Study, there are a number of substantial regeneration schemes coming forward within the centres of Kirklees, and particularly within Huddersfield and Dewsbury. These regeneration schemes provide opportunities to support new leisure uses, which will include the food and drink uses as noted above. As such, the identified capacity for food and beverage floorspace is likely to be absorbed at least in part, by the demand created by these schemes and policy should support this.

9.39 The Town Centres Practice Guidance states at paragraph 012 that the use of the sequential test should recognise that certain town centre uses have particular market and locational requirements, which meant that they may only be accommodated in specific locations. It goes on to state that robust justification will be needed where this is the case. Whilst the guidance does not circumnavigate the need for a robust assessment, it does provide scope for proposals to be situated in alternative non-town centre locations should there be no sequentially preferable locations in centre.

Planning Policy Recommendations

General Policy Approach

9.40 The adopted and emerging local plan promotes a 'town centre first' policy approach which is broadly consistent with the general requirements of paragraphs 90 to 95 of the NPPF.

9.41 In this regard, we note that paragraph 018 of the Town Centres PPG indicates that proposals for edge and out of centre retail and leisure developments should be considered with reference to the health of centres that would be impacted by development. Paragraph 018 states that:

'A judgement as to whether the likely adverse impacts are significant can only be reached in light of local circumstances. For example, in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.'

9.42 In this context, it will be important for the emerging plan to clearly set out the importance of the sequential and impact tests and explain the local circumstances which frame how they will be applied in practice. The sequential and impact tests will need to be applied in a robust manner in order to provide for the re-use of vacant units and to support centres which retain a strong retail function as well as a diverse range of other uses. Whilst non-retail uses will be an important component of the mix of land uses in principal centres moving forward, there is still a requirement to accommodate new retailers and secure additional retail floorspace within defined centres wherever possible in accordance with the requirements of the NPPF.

9.43 It will be important for the forthcoming plan to clearly identify that Huddersfield and Dewsbury as the principal town centres should remain a focus for both convenience and comparison goods retail and that such uses remain important in driving footfall. In addition, retail uses within Batley, Cleckheaton, Holmfirth and Heckmondwike will also continue to be key elements of the overarching composition of the centres, driving footfall and helping to support the needs of the residents within their corresponding catchment areas. It is critical that defined centres continue to diversify in order to provide access to jobs, leisure, culture, services, and social connection.

9.44 In the context of the current vacancy rate and national planning policy requirements, we recommend that emerging plan policies are sufficiently flexible so as to allow for an appropriate range of town centre uses beyond retail, and reflect the need to repurpose historic, sometimes outdated retail stock in order to accommodate new residential, leisure and community uses. To this end, we note that paragraph 90 of the NPPF states that planning policies should:

'…recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.'

9.45 The emerging plan should also consider the effects of the expanded Use Class E and the consequences of the additional flexibility which Class E provides for outside of town centres. The authority may wish to consider applying restrictive conditions to planning permission for Class E development which is delivered outside of town centres to restrict the authorised use to that which has been justified in the application submission. This will help ensure that unacceptable impacts do not arise within town centre as a consequence of future Class E development.

9.46 Having assessed these factors, and despite the Study identifying capacity for convenience floorspace in particular, given the local context and the offer of existing destinations within the authority area, this Study has reached the conclusion that it is reasonable to move away from a quantitative need led approach to planning for retail land uses and, instead, base the new Local Plan strategy on a wider basket of indicators. This is on the basis as set out above, insofar as there being no sites identified within or on the edge of defined centres to accommodate the need and that protecting the centres should be the priority for the local authority within the new local plan. Providing out-of-centre allocations for additional retail floorspace could potentially jeopardise the future health of the existing and proposed centres within the district and is not supported by the evidence provided within this Study.

9.47 The overarching policy approach should therefore be based upon the following key pillars which provides a positive strategy to the defined centres and whilst continuing to acknowledge that the new Local Plan intends to plan for meeting retail 'needs' alongside other main town centre land uses:

a. New / replacement floorspace will naturally be encouraged by the Council's positive planning strategy for existing defined centres. Even without specific site / area allocations, the new Local Plan is able to provide for a positive policy environment to provide new retail land uses within defined centres.

b. Planned centres will be providing new retail floorspace to meet some of the identified 'needs'. A key element of providing for retail needs, alongside other main town centre land uses, is via planned new centres.

c. New retail provision will also be provided through the development management process. It will remain the case that proposals for new retail floorspace / retail uses will come forward outside of the plan-led system and, instead, be dealt with via the development management process. Whilst such proposals will face detailed scrutiny, they will, if permitted, go some way to meeting the needs of the retail sector and the local community.

Hierarchy

9.48 Paragraph 90 of the NPPF identifies that local planning authorities should define a network and hierarchy of town centres. However, very little detail is provided in this regard and, notably, neither the NPPF nor the Town Centres PPG differentiates between different types of town centre and the role each serves.

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

9.50 Annex B of PPS4 identified that:

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

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

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

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

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

9.51 Our findings from the review of the health of the defined centres within the district has found that:

- Huddersfield is performing an important principal town centre role within the district, being the principal and largest centre. The town centre provides for the largest quantum of commercial floorspace, which includes larger format convenience floorspace meeting residents' day-to-day needs including main food shopping needs.
- Dewsbury also continues to perform a role similar to Huddersfield but on a smaller scale, being the second largest centre within the district and meeting a range of retail, leisure and service needs of residents in a wider catchment than the smaller centres.
- Batley, Cleckheaton, Holmfirth and Heckmondwike town centres are performing important smaller town centre roles within the district, with a variety of smaller-scale commercial operators present, alongside convenience stores.

Boundaries

9.52 Paragraph 90 of the NPPF requires local plans to **'define the extent of town centres and primary shopping areas'.**

9.53 National planning policy no longer explicitly prescribes the designation of primary and secondary frontages. The Government has confirmed that the removal of this requirement reflects the general need to be flexible in planning for the future of town centres due to the rapid changes taking place in the retail and leisure industries. Whilst the removal of the requirement does not preclude local planning authorities from identifying primary and secondary shopping frontages where supported by local circumstances, we do not believe that this is merited in this instance.

9.54 In this regard, there is a clear need to repurpose and reoccupy centres across the authority area in the manner that Use Class E generally provides for. In this context, the separate designation of both primary and secondary frontages would serve no useful purpose. Instead, where appropriate, we recommend a single defined 'primary shopping area' to provide for that additional flexibility required to help support the future vitality and viability of the defined centres.

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

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

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

9.57 Annex 2 further defines main town centres uses as:

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

9.58 In this context, it is important to note that, although there is the opportunity to define separate primary shopping area and town centre boundaries, there is no general requirement to do so unless the specific characteristics of the subject centre support such an approach. Government policy specifically encourages the diversification of centres. Whilst retail will (in most cases) be a key element of a town centre, the majority of lower-order centres are diverse and uses are typically distributed throughout the centre. Such centres may not have a particular concentration of retail uses at their core.

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

9.60 In terms of the recommended changes to the boundaries of Kirklees' town centres, we provide a summary below, with the plans provided at Appendix 6.

Table 9.3: Summary of Proposed Changes to Boundaries

Name	Boundary Recommendations
Huddersfield Principal Town Centre	We have reviewed the currently defined boundary for Huddersfield principal town centre and consider that it remains appropriate in defining the area within which main town centre uses are concentrated. We therefore do not recommend any changes to the currently defined principal town centre boundary. With regard to retail uses, specifically, we have also reviewed the currently defined Primary Shopping Area within the town centre. We recommended some small additions to the west of the Primary Shopping Area to include the Sainsbury's supermarket and adjacent units on Market Street, as well as the addition of retail units on Brooke Street, to the north of the PSA boundary. We consider this extended boundary to be the appropriately defined area within which retail uses are concentrated, in accordance with Annex 2 of the NPPF. The adopted development plan defines primary and secondary frontages within the town centres. However, as identified above, we believe that the existing primary and secondary frontages should not be maintained going forward given the provisions of Class E of the Use Classes Order and the Government's general objective that there should be greater flexibility on the high street. The same conclusion regarding the removal of primary and secondary frontages also applies to all of the centres subsequently listed in this table.
Dewsbury Principal Town Centre	We do not recommend any changes to the currently defined principal town centre boundary for Dewsbury. With regard to the Primary Shopping Area, we recommend an extension to the east to include the newly opened Umrah supermarket and some retail units on Crakenedge Lane.
Batley Town Centre	We recommend a small extension to the northwest of the centre boundary to include the Heeleys Batley building and surrounding amenity areas between Branch Road and Stocks Lane.

Name	Boundary Recommendations
	Due to the nature of the town centre, there is not one single concentration of retail uses, and instead they are spread throughout the centre. As such, we do not recommend the designation of a primary shopping area and, instead, just a town centre boundary is defined.
Cleckheaton Town Centre	We recommend a contraction of the town centre boundary in the north to exclude the hand car wash, dwellings and vacant units in this part of Bradford Road. We do not recommend the designation of a primary shopping area in Cleckheaton.
Heckmondwike Town Centre	We recommend a small extension to the east of the Heckmondwike town centre boundary to include the Bed Kingdom store and adjacent retail service units on Oldfield Lane. We do not recommend the designation of a primary shopping area in Heckmondwike.
Holmfirth Town Centre	We do not recommend any changes to the currently defined town centre boundary for Holmfirth. We do not recommend the designation of a primary shopping area in Holmfirth.

Thresholds

9.61 Paragraph 90 of the NPPF indicates that it is appropriate to identify thresholds for the scale of edge of centre and out of centre retail and leisure developments which should be the subject of impact assessment. Any such threshold policy applies to the impact test only (all planning applications for main town centre uses which are not in an existing centre and not in accordance with an up-to-date development plan should be the subject of the sequential test[21]).

9.62 The purpose of applying an impact threshold within the development plan which deviates from the national threshold of 2,500 sq.m is to allow the Council to retain appropriate control in respect of the potential for development to impact on the future health of defined centres within the authority area. In applying a lower threshold, applications for developments which could potentially have a harmful effect on the overall vitality and viability of a defined centre, will need to be supported by a proportionate impact assessment which sets out the potential trade diversion impact assumptions.

9.63 The current impact threshold is set by Policy LP13 of the Kirklees Local Plan. The policy states that:

'An Impact Assessment will be necessary for proposals (including the formation of mezzanine floors) for/or which include retail, leisure and office developments which are not located within a defined centre where:

- **the proposal provides a floorspace greater than 500 sq.m gross; or**
- **the proposal is located within 800 metres of the boundary of a Town Centre or District Centre and is greater than 300 sq.m gross; or**
- **the proposal is located within 800 metres of the boundary of a Local Centre and is greater than 200 sq.m gross.**

[21] With the exception (in accordance with paragraph 89 of the NPPF) of small scale rural office proposals and other small scale rural development.

The scope and content of any Impact Assessment shall be agreed with the Council and shall be reflective of the scale, role and function of the proposal. Proposals which would have an significant adverse impact on surrounding centres shall not be supported.'

9.64 Paragraph 015 of the Town Centres PPG provides specific guidance in relation to floorspace thresholds and states:

'The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace unless a different locally appropriate threshold is set by the local planning authority. In setting a locally appropriate threshold it will be important to consider the:

- **scale of proposals relative to town centres**
- **cumulative effects of recent developments**
- **whether local town centres are vulnerable**
- **likely effects of development on any town centre strategy**
- **impact on any other planned investment.'**

9.65 Using the above guidance, we set out below the justification to support our view that a lower threshold should be applied across the hierarchy of centres within the authority areas.

9.66 In considering the setting of a local impact threshold, it is relevant to give consideration to the type of development (relating to convenience and comparison goods retail uses, and leisure uses) which would, in practice, provide space for key operators who could help act to 'anchor' a centre. Should one of these anchor units or operators leave a centre, it is more likely that there will be the potential for a significant adverse impact to arise.

9.67 Where there is genuine potential for an application proposal to divert a material level of expenditure away from a defined centre, or potentially remove a key tenant from that centre, there will likely be a requirement to consider the impacts arising from the proposal in detail.

9.68 In respect of lower order centres, the introduction of even a small convenience store nearby (of the type operated by Sainsbury's Local or Tesco Express) may have the potential to impact on the ongoing viability of key operators. Small convenience stores operated by national multiple grocers can generate a relatively substantial turnover. If this is diverted from existing retailers in defined centres, the impact on the overall vitality and viability through the loss of spend and footfall, could be of a significant adverse magnitude.

9.69 Therefore, in implementing a local threshold policy, it is considered more appropriate to apply a range of thresholds in accordance with the type of centre the proposed development is proximate to. The thresholds should not only apply to new floorspace, but also to changes of use and variations of condition to remove or amend restrictions on how units operate or trade in practice.

9.70 In Huddersfield town centre, 8.0% of all units have a gross floorspace which is greater than 500 sq.m and 15.8% have a gross floorspace which is greater than 300 sq.m. The vacancy rate equates to 23.0% of total commercial floorspace and 22.6% of all units. In total, convenience and comparison goods uses account for 66,566 sq.m of floorspace, or 46.1% and the average unit size is 234 sq.m.

9.71 In Dewsbury town centre, just 5.4% of all units have a gross floorspace which is greater than 500 sq.m and 12.0% have a gross floorspace which is greater than 300 sq.m. The vacancy rate equates to 34.9% of total commercial floorspace and 38.2% of all units. In total, convenience and comparison goods uses account for 7,659 sq.m of floorspace, or 36.2% and the average unit size is 162 sq.m.

9.72 In light of the above, we are of the view that the 300 sq.m threshold for the town centres continues to be the appropriate threshold. This is on the basis of:

- Huddersfield, Dewsbury and the smaller town centres remain vulnerable to increasing competition from out-of-centre retail parks, in addition to the broader national trends identified in this report such as the growth in internet shopping and rises in the cost of living.
- Modern comparison retailers typically require units with a minimum floorspace of 500 sq.m to 1,000 sq.m gross in order to reach the 'critical mass' needed to display their full range of goods in-store and attract customers from a wide catchment area. Non-food stores of over 500 sq.m gross are unlikely to trade as a purely local facility, particularly in the context of the smaller town centres given the relatively small size of much of its retail stock.
- While we recognise that most foodstore formats are provided for across the authority area, there may be opportunity for retailers to bring forward additional stores in areas likely to be the subject of significant residential growth, particularly the smaller local convenience store formats such as Sainsbury's Local. Kirklees' town centre foodstores help to underpin their function as a day-to-day shopping destination, drawing in custom and encouraging linked trips to the other parts of the centre. Should the viability of these stores be impacted, there is a real risk of the role of the wider centre being undermined. There are few units larger than 300 sq.m within the town centres. Accordingly, in the local context, 300 sq.m constitutes a significant unit with the potential to result in an impact on shopping patterns.
- With regard to other main town centre uses (including leisure uses), the recommendation is again reflective of average unit sizes and the need to safeguard the vitality and viability of the town centre without unnecessarily stifling development.

9.73 The above recommendation is also reflective of town centre vacancy rates and the potential for out-of-centre retail developments to become even stronger in the future at the expense of the health of defined centres.

9.74 We recommend that a 500 sq.m impact threshold should effectively act as default to be applied authority-wide, should a proposal not be subject to a lesser threshold of relevance to smaller centres.

9.75 In terms of the defined town centres, we are of the view that a lower threshold of 300 sq.m for both convenience and comparison floorspace should apply.

9.76 The thresholds should not only apply to new floorspace, but also to changes of use and variations of condition to remove or amend restrictions on how units operate or trade in practice.

9.77 It is important to emphasise that, whilst the locally set threshold would require the submission of an impact assessment for all edge-of-centre and out-of-centre developments exceeding the thresholds, national guidance states that the impact test should be undertaken in a proportionate and locally appropriate way, commensurate to the scale of development proposed. The level of detail would typically be agreed with Planning Officers during the pre-application process in order to avoid overly onerous requirements that may otherwise restrict and delay development opportunities from coming forward.

Appendix 1 – Study Area

Appendix 2 - Household Survey Results

Appendix 3 – Town Centre Healthchecks

Appendix 4 – Quantitative Retail Tables

Appendix 5 – Quantitative Leisure Tables

Appendix 6 – Proposed Boundaries

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