Bury Town Centres Policy Advice

Final Study

ON BEHALF OF BURY COUNCIL

February 2026

Contents

Appendices

1. Introduction and Overview

1.1 Nexus Planning has been commissioned by Bury Council to prepare a Retail and Leisure Impact Assessment Threshold Study to support the preparation of the emerging Bury Local Plan. The Study will form a key component of the Local Plan evidence base and is required to ensure that future proposals for retail and main town centre uses are appropriately directed, assessed and managed in accordance with national policy, including the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

1.2 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.

1.3 The commission responds to the need for an up-to-date understanding of the role, performance and future prospects of Bury's defined centres at a time of rapid change in the retail and leisure sectors.

1.4 The specifics of the commission can be summarised as follows:

1. To provide a comprehensive review of existing and emerging planning policy relevant to retail, leisure and town centre uses within Bury;
2. To undertake detailed healthchecks of Bury's defined centres, supported by site surveys and analysis of Experian Goad data;
3. To assess changing retail and leisure trends at national, regional and local levels, and their implications for Bury's hierarchy of centres;
4. To consider the performance, resilience and vulnerabilities of the centres, including through the preparation of benchmark impact assessments;
5. To review out-of-centre retail and leisure provision and associated market pressures;
6. To provide evidence-based recommendations on appropriate local retail and leisure impact thresholds for inclusion within the emerging Local Plan; and
7. To prepare clear and defensible policy advice to support the future planning, management and regeneration of Bury's centres.

1.5 The Study has also included a full review of the existing adopted planning policy at both the national and local level.

1.6 There are a number of recurring themes identified throughout the planning policy review which will be important to consider in the context of future development for main town centre uses within the Bury area, including:

- **Strengthening the hierarchy of centres** – Bury's adopted and emerging policies clearly articulate a structured network of centres, ranging from Bury as the sub-regional centre to smaller district, local and neighbourhood centres. The Local Plan emphasises the importance of ensuring that each centre has a distinctive, complementary role, with an appropriate scale of development directed to each tier of the hierarchy.
- **Supporting diversification and reducing reliance on traditional retail** – Both the saved Unitary Development Plan (UDP) policies and the draft Local Plan recognise that centres can no longer rely on traditional comparison retailing as their primary function. There is a clear shift toward mixed uses, including leisure, culture, food and drink, residential, community facilities and flexible workspace, to ensure centres remain vibrant and resilient.
- **Focusing development within existing centres** – Consistent with national policy, Bury's planning framework maintains a strong emphasis on directing main town centre uses to defined centres first, supported by

sequential and impact tests. This approach reflects the need to manage the growing pressures from out-of-centre retail and leisure parks, and from national trends such as online retailing.

- **Ensuring flexibility and adaptability in centres** – The emerging Local Plan acknowledges the need for more flexible planning approaches, particularly in response to changes in the Use Class Order and Permitted Development Rights. Enabling centres to accommodate a variety of commercial, cultural and residential uses is seen as essential to their long-term health.

- **Improving accessibility, environmental quality and public realm** – Across the policy suite, there is a consistent ambition to make centres more attractive, accessible and inclusive places to visit. This includes investment in active travel infrastructure, sustainable transport connections, a high-quality public realm, and environmental enhancements, many of which support wider regeneration programmes such as the Radcliffe Civic Hub and the Prestwich village centre redevelopment.

1.7 Given the above, the remainder of this Study is structured into the following key sections:

- Section 2 provides an overview of relevant retail and town centre planning policy at a national and local level relevant to this Study;
- Section 3 provides an overview of the current and emerging retail leisure trends, and how these trends are impacting Bury's centres;
- Section 4 provides an overview of Nexus' healthchecks;
- Section 5 provides an overview of the out of centre provision within the authority area; and
- Section 6 provides our overarching summaries and policy recommendations.

2. Policy Background

2.1 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, and provide a brief overview of the draft policies provided within consultation version of the NPPF, published in December 2025.

National Planning Policy Framework

2.2 The most recent published 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.

2.3 NPPF policies are considered on a thematic basis below.

Plan-Making

2.4 Paragraph 20 of the NPPF indicates that development plans should set out an overall strategy for the pattern, scale and quality of development, including policies to deliver retail, leisure and other commercial development. Paragraph 31 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

2.5 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

2.6 Paragraph 90 specifically relates to planning for town centres. It states that:

'Planning policies should:

- **a.** **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;**
- **b.** **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;**
- **c.** **retain and enhance existing markets and, where appropriate, re-introduce or create new ones;**
- **d.** **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;**
- **e.** **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

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

2.7 The requirement to plan to meet needs across a minimum ten-year period represents a change from the previous NPPF which required town centre needs to be met in full across the entire plan period.

2.8 In addition, it is notable that the NPPF Annex 2 Glossary fails to make any reference to the designation of primary and secondary frontages. Page 32 of the Government Response to the Draft Revised National Planning Policy Framework Consultation1 indicates that, whilst the revised NPPF has removed the expectation in national planning policy that such frontages must be defined, this does not necessarily preclude authorities from doing so where their use can be justified. However, it is evident that the general intention is to provide for more flexibility through a less prescriptive approach to land use.

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

Promoting Healthy and Safe Communities

2.10 Paragraph 97 seeks to support the social, recreational, and cultural facilities and services communities need. The guidance states that planning policies and decisions should:

- **'Plan positively for the provision and use of shared spaced, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses, and places of worship), and other local services to enhance the sustainability of communities and residential environments;**
- **take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;**
- **guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;**
- **ensure that established shops, facilities, and services are able to develop and modernise, and are retained for the benefit of the community; and**
- **ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.'**

Ensuring the Vitality of Town Centres Planning Practice Guidance

2.11 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.

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

[1] Published July 2018.

- 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.

2.13 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.

2.14 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 centres across the authority areas).

Use Classes Order

2.15 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.

2.16 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.

2.17 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.

2.18 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.

2.19 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

2.20 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

2.21 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'.

2.22 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.'**

2.23 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.

2.24 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.'

2.25 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).'**

Places for Everyone (PfE) 2024

2.26 The Places for Everyone (PfE) Plan is the long-term strategic spatial plan of the nine Greater Manchester districts (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford, and Wigan), adopted on March 21, 2024, which sets out the framework for jobs, new homes, and sustainable growth up to 2039.

2.27 The relevant policies as it pertains to retail uses are summarised below.

Policy JP-P 4 New Retail and Leisure Uses in Town Centres

2.28 The policy maintains and enhances the established retail and leisure hierarchy across Greater Manchester. Within this hierarchy, Bury town centre is identified as the main town centre for Bury. This designation confirms Bury's role as the Borough's primary focus for new retail and leisure development.

2.29 Proposals for such uses should therefore be directed to Bury in the first instance, in line with the sequential approach set out in national and local policy, to support the vitality and viability of the town centre and ensure it continues to function as a key destination within the wider Greater Manchester centre hierarchy.

2.30 Paragraph 9.21 states that:

'The boundaries of the centres and detail of other centres at lower levels of the hierarchy are defined in district local plans. Appropriate large-scale retail and leisure development will be accommodated within the centres in the upper levels of the hierarchy. The need for the expansion of any existing centres, or the provision of new centres, will be identified in district local plans.'

Policy JP-Strat12: Main Town Centres

2.31 Policy JP-Strat12 provides an overview of the role of main town centres within Greater Manchester, and states that:

'The role of the main town centres as local economic drivers will continue to be developed, providing the primary focus for office, retail, leisure and cultural activity for their surrounding areas. Development here will offer a significant opportunity to reduce levels of poverty and deliver inclusive growth.

Opportunities to further increase the population catchments of these centres will be taken, including significantly increasing the resident population of the main town centres by providing a mix of type and size of dwellings supported by the necessary infrastructure and amenities including new and improved public spaces and green infrastructure. This will be achieved alongside, rather than displacing, the range of non-residential uses in the centres. Housing growth along the key public transport corridors into the main town centres will also be promoted, further increasing the population catchments of those centres.

The role of the main town centres as major public transport hubs will be developed and supported by a network of active travel routes, enabling residents to have improved access to opportunities across Greater Manchester as well as within the centres themselves.

Development will be carefully managed to ensure that the local distinctiveness of each main town centre is retained and enhanced. Opportunities will also be taken to protect and enhance natural and historic assets in the town centres.'

Local Planning Policy Context

Unitary Development Plan

2.32 The statutory development plan for Bury currently comprises the Bury Unitary Development Plan (UDP), which was adopted on 29 August 1997 and continues to form the basis for the Council's planning decisions until it is replaced by a new Local Plan. In 2007, the Secretary of State confirmed that the majority of UDP policies would remain saved, enabling them to continue to guide development across the Borough, including policy considerations relating to town centres, retail provision and land-use change. While some UDP policies have since been superseded by more recent development plan documents, the saved policies remain an important part of the policy framework currently in force.

2.33 The key policies relating to retail and town centre uses are summarised below.

Table 2.1: Key Retail and Town Centre Policies within the Adopted Local Plan

Policy Reference & Title	Summary of Policy
Shopping Chapter	
S1: Existing Shopping Centres	Seeks to protect, maintain and enhance the established hierarchy of shopping centres. Retail and complementary uses should be focused within centres to support vitality, viability, linked trips, public transport use, regeneration and investment.
S1/1: Shopping in Bury Town Centre	Supports growth and renewal of Bury Town Centre as the Borough's principal (sub-regional) centre. Encourages additional comparison retail floorspace and complementary uses to reinforce its role and competitiveness.
S1/2: Shopping in Other Town Centres	Seeks to maintain and strengthen Ramsbottom, Radcliffe and Prestwich town centres. Supports modest growth where appropriate, with emphasis on consolidation and enhancement.
S1/3: Shopping in District Centres	Supports retail development within district centres where it is appropriate in scale and function to serve local needs and maintains the role of these centres primarily for convenience shopping.
S1/4: Local Shopping Centres	Aims to protect and enhance local centres serving day-to-day needs. Major increases in floorspace are discouraged, but limited development may be supported where it strengthens local provision without harming existing facilities.
S1/5: Neighbourhood Centres and Local Shops	Seeks to retain retail (Class A1) as the predominant use in neighbourhood centres and small local shops. Recognises viability considerations but aims to safeguard essential local convenience provision within walking distance of homes.
S1/6: Additions to the Shopping Hierarchy	Allows for new local shopping provision where areas are inadequately served, provided proposals are justified by local need and do not undermine existing centres.
S2: Control of New Retail and Non-Retail Development	Manages the type and location of retail and non-retail uses to protect the retail core of centres. Retail investment should be directed to centres, with non-retail uses controlled to avoid harming vitality.
S2/1: All New Retail Proposals: Assessment Criteria	Requires retail proposals to be located within or adjoining main shopping areas, enhance vitality and viability, be accessible, and demonstrate acceptable design, traffic, servicing, amenity and parking arrangements.
S2/2: Prime Shopping Areas and Frontages	Seeks to maintain retail (Class A1) as the dominant ground-floor use within prime frontages. Limits non-retail uses, particularly where they would exceed 10% of a frontage, to protect the retail core.
S2/3: Secondary Shopping Areas and Frontages	Maintains retail predominance in secondary areas but allows greater flexibility than prime areas. Controls non-retail uses where they would exceed 40% of a frontage to prevent over-concentration.
S2/4: Control of Non-Retail Uses in All Other Areas	Outside main shopping areas, change from retail to non-retail may be permitted subject to considerations including scale, clustering, vacancy, alternative provision, parking and local need.

Policy Reference & Title	Summary of Policy
S2/5: New Local Shopping Provision Outside Recognised Centres	Supports small-scale local shops outside centres where there is clear unmet need and no harm to established centres, subject to amenity, parking and impact considerations.
S2/6: Food and Drink	Assesses restaurants, cafés and takeaways primarily on amenity, concentration, parking and servicing impacts. Such uses should be located in appropriate centres or mixed-use areas and may be controlled by condition.
S2/7: Amusement Centres and Arcades	Directs amusement uses to appropriate town/district centre locations but not within prime shopping frontages. Proposals must not harm amenity or heritage assets.
S3: New Retail Development and Environmental Improvements	Encourages well-located retail development and environmental improvements within or adjoining main shopping areas to strengthen centres and improve environmental quality.
S3/1: Retail Development Opportunities Within or Adjoining Town Centres	Supports retail development on identified opportunity sites within or adjoining town centres, provided schemes are appropriate in scale and provide adequate access, parking and servicing.
S3/2: New Retail Development Opportunities Within District Centres	Encourages appropriate retail development within district centres that meets local needs and fits the character and scale of the centre.
S3/3: Improvement and Enhancement (All Centres)	Promotes refurbishment and environmental improvements in centres experiencing decline, vacancy, traffic issues or environmental problems to support regeneration and vitality.
S4: New Retail Development Outside Town and District Centres	Resists out-of-centre retail development unless it meets purely local needs or satisfies specific exception policies, in order to protect the retail hierarchy.
S4/1: Retail Development Outside Town and District Centres	Allows certain specialist or trade-related retail uses outside centres where appropriate, subject to environmental safeguards and potential restrictions on goods sold.
S4/2: Assessing Out-of-Centre Retail Development	Requires out-of-centre proposals to demonstrate no harm to vitality and viability of centres, acceptable environmental and highway impacts, good accessibility, and lack of suitable in-centre alternatives through the sequential test. Green Belt and protected open land locations are not appropriate.
S5: Large Out-of-Town Shopping Centres	The Council will oppose new shopping proposals (within Bury or elsewhere in Greater Manchester) that would significantly prejudice the vitality and viability of established town centres due to their scale or nature.
Town Centres Chapter	
TC1 – Town Centres	Seeks to *protect, maintain and improve* the four town centres (Bury, Ramsbottom, Radcliffe, Prestwich) as important commercial, retail and social hubs. Emphasises improved facilities, strengthened roles, enhanced environmental quality and comprehensive support for investment.
TC1/1 – Open Space in Town Centres	Protects valuable open spaces within town centres that contribute to civic design, visual amenity, recreation, wildlife habitats or act as buffers. Only allows development where appropriate mitigation or significant benefits are demonstrated.
TC1/2 – Pedestrian/Vehicular Conflict in Town Centres	Requires measures to reduce conflict between pedestrians and traffic in key locations across the town centres, including traffic management, calming schemes and improvements to crossing facilities.

Policy Reference & Title	Summary of Policy
TC2 – Town Centre Enhancement and Development	Encourages town centres to develop as the *principal focal points* for cultural, leisure, business, professional services and retail activity. Restricts proposals that would harm vitality and viability
TC2/1 – Upper Floors	Supports the reuse of vacant or underused upper floors for beneficial uses such as offices or residential accommodation to improve building maintenance and contribute to overall vitality.
TC2/2 – Mixed Use Development	Promotes compatible mixed-use development within town centres e.g., retail, leisure, office and community uses where they complement primary functions and do not introduce conflict
TC2/3 – Vacant and Cleared Sites	Encourages temporary or interim uses (including landscaping or car parking) on cleared or vacant sites that may remain unused for some time, ensuring they do not detract from the town centre environment.
TC3 – Bury Town Centre	Establishes Bury as a sub-regional *centre* and prioritises expansion and enhancement of its retail, commercial, office, cultural and civic functions. Supports investment and identifies major opportunities for new development.

2.34 The UDP uses an area-based approach to guide development in more detail within each town centre. These policies sit beneath the broader town centre policies and respond to the unique character, land-use patterns and regeneration needs of each centre.

2.35 A summary of the main aspirations for different towns is provided below.

Ramsbottom Town Centre

2.36 Ramsbottom's area approach supports its role as a tourism-focused, heritage-led centre with a growing specialist retail market. The policies:

- Protects and enhances community facilities, open spaces and recreation areas, including the Market Place, Carr Street and Ramsbottom Lane.
- Maintains and improves the predominant residential character in several parts of the centre, supporting sensitive infill and environmental upgrades.
- Concentrates retail, restaurants and specialist shops within the Bolton Street and Bridge Street shopping core, encouraging high-quality design within the Conservation Area.
- Promotes redevelopment of former mill and industrial land at Square Street for a mix of appropriate town centre uses, including leisure, business, office and residential.
- Enhances the gateway environment around Ramsbottom Station, improving visitor experience linked to the East Lancashire Railway.

Radcliffe Town Centre

2.37 Radcliffe's area policies collectively aim to reverse decline, stimulate regeneration, and create a safer, more vibrant town centre. The policies:

- Focuses retail and community activity in the main Blackburn Street / Church Street West shopping area, supporting modernisation, public realm improvements and improved pedestrian movement.

- Protects and consolidates community, civic and leisure uses around Green Street and New Church Street, forming an important cluster of town centre services.
- Identifies significant redevelopment opportunities south of Pilkington Way, encouraging modern business, light industrial, office and complementary retail uses to diversify the economy.
- Supports housing renewal and environmental enhancement in established residential areas such as Stand Lane, Milltown Street and Bridgefield Street.
- Promotes employment and mixed-use development near Radcliffe Metrolink Station to maximise the benefits of sustainable transport accessibility.
- Seeks river corridor improvements, including better access to the River Irwell and long-term riverside enhancements.

Prestwich Town Centre

2.38 Prestwich's policies aim to strengthen its local service role, improve its fragmented townscape, and make better use of transport assets. The policies:

- Strengthens the Longfield Centre and Bury New Road as Prestwich's primary retail and service core, supporting refurbishment and additional shopping uses.
- Maintains and enhances residential neighbourhoods to the east and west of the centre, supporting environmental and housing improvements.
- Protects and supports existing community facilities, including the library, health centre, schools and the Longfield Suite.
- Encourages redevelopment opportunities towards the south of the centre for office, retail, and mixed-use schemes, improving key gateways along the A56.
- Supports development linked to Metrolink, recognising its role in driving accessibility and investment.

Draft Bury Local Plan

2.39 Following the adoption of the Places for Everyone Joint Plan (PfE) on 21 March 2024, the Council has progressed work on preparing a new Bury Local Plan to replace the UDP. Consultation on the draft Local Plan took place between 17 March and 12 May 2025, setting out a long-term strategy for managing growth and development across the Borough between 2022 and 2042. The draft plan includes a series of policies relevant to retail, town centres and the hierarchy of centres, supported by a draft Policies Map identifying where specific policies will apply.

2.40 The key policies relating to retail and town centre uses from the draft Local Plan are summarised below.

Table 2.2: Key Retail and Town Centre Policies within the Draft Local Plan

Policy Reference & Title	Summary of Policy
TC1: Hierarchy and Role of Centres	Seeks to maintain and enhance the vitality of the Borough's hierarchy of centres. Bury will continue as the sub-regional centre; Ramsbottom, Radcliffe and Prestwich will consolidate their roles as town centres; district, local and neighbourhood centres will continue meeting community needs. New local centres will be required to support major new development areas.
TC2: Managing the Location and Scale of Main Town Centre Uses	Requires main town centre uses to be located in centres first, then edge-of-centre, then out-of-centre only if no suitable sites exist. Proposals outside centres must meet the sequential test. Larger retail or leisure schemes outside centres must provide an impact

Policy Reference & Title	Summary of Policy
	assessment. Applications will be refused where the sequential test is not met or where significant adverse impacts are likely.
TC3: Primary Shopping Areas	Seeks to maintain retailing (Class E(a)) as the predominant ground-floor use in Primary Shopping Areas. Changes to non-retail uses will be assessed against their impact on vitality, footfall, character, scale, potential nuisance, and whether they would create an over-concentration of non-retail uses.
TC4: Local and Neighbourhood Centres	Seeks to retain retail (Class E(a)) as the predominant use within local and neighbourhood centres. Changes to non-retail uses will be assessed based on their impact on vitality, appropriateness to local needs, scale, character, vacancy duration and availability of alternative local facilities.
TC5: Local Shops and Services	Seeks to retain local shops and services outside recognised centres where they meet day-to-day needs. Proposals for loss of such facilities must demonstrate full marketing and lack of demand for continued local retail or service use.
TC6: Upper Floors in Centres	Supports bringing vacant or underused upper floors in centres back into productive use, including for offices or residential uses, to make better use of existing buildings and improve maintenance and appearance.
BE9: Food and Drink	Highlights considerations for proposals for restaurants, hot food takeaways, cafes, snack bars, public houses and any other uses involving the sale of food and drink.

3. Commercial Market Overview

3.1 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.

3.2 The below commentary should therefore be taken as a 'snapshot' in respect of current market conditions; it will be necessary to judge future development proposals for main town centre uses with reference to the prevailing 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

3.3 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.

3.4 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.

3.5 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.

3.6 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.'

3.7 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.

3.8 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.

3.9 In terms of inflation, Office for National Statistics data[2] 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.

3.10 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.

3.11 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).

3.12 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.

3.13 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

3.14 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.

3.15 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

[2] 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.

3.16 As the below Table 3.1 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 3.1: 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

3.17 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[3] and, in particular, through online sales.

3.18 The below Table 3.2 sets out Experian's identified and forecast level of special forms of trading as a proportion of overall convenience and comparison goods expenditure. Experian estimates that special forms of trading will account for just under four out of every ten pounds spent on comparison goods and almost a quarter of convenience goods expenditure at 2040.

Table 3.2: 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

3.19 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[4], 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.

3.20 These figures are provided in Table 3.3 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.

[3] Including internet sales, mail order, stalls and markets, door-to-door and telephone sales.
[4] 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 3.3: 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

3.21 Recent socio-economic conditions have led to significant shifts in convenience goods retailing, which have resulted in the 'big four' supermarket operators' market share being cut. Indeed, analysis from Kantar[5] 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.[6]

3.22 Mintel[7] 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.[8] 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.

3.23 The shifts in the sector are illustrated with reference to changes in retailers' market share in recent years, as shown in Table 3.4.

3.24 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

[5] An international market research company based in London.
[6] Kantar, Great Britain Grocery Market Share (12 Weeks Ending), 9 June 2024.
[7] 'UK Retail Rankings', Mintel (a market research company), April 2018.
[8] Article headlined 'Average UK first-time buyer is now older than 30, says Halifax', The Guardian, January 2022.

September 2023 that it intends to open another 500 stores in the coming years.[9] Lidl intends to open a further 250 stores across the UK.[10]

3.25 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 3.4: 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

3.26 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.

3.27 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.[11] 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.[12]

3.28 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

[9] Article headlined 'Aldi claims it is increasingly shoppers' main supermarket for weekly shop', The Guardian, 8 September 2023.
[10] 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).
[11] Article headlined 'After Topshop owner Arcadia's demise, what now for UK clothes shopping?' The Guardian, 13 February 2021.
[12] Article headlined 'Shopping centre owner Intu collapses into administration', The Guardian, 26 June 2020.

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.

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

3.30 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.

3.31 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

3.32 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.

3.33 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.

3.34 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.

3.35 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.

3.36 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.[13] Around one in every seven Britons has a gym membership. Budget gyms are currently particularly popular, with operators such as Pure Gym, The Gym Group, and easyGym utilising a format that is based on low costs and high volume.

The Night-Time Economy

3.37 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.

3.38 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.

3.39 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 stays open after dark for people to enjoy local shops and services within a wider cultural event involving music, art and, most importantly, through the lighting up of buildings and light-based art installations.

3.40 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

3.41 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

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

shops, restaurants, offices, gyms and nurseries (amongst other uses) such that planning permission is no longer typically required to switch uses.

3.42 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.

3.43 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.

3.44 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.

3.45 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

3.46 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.

3.47 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.

3.48 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.'

3.49 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 Bury

3.50 Bury town centre remains the borough's principal commercial and civic hub. It benefits from strong transport connectivity, including Metrolink links to Manchester, and from the draw of Bury Market, a major visitor attraction and economic anchor. The market contributes significantly to footfall and supports surrounding businesses.

3.51 Other town centres within the borough exhibit distinct characteristics:

- Prestwich and Whitefield benefit from proximity to Manchester and have developed strong food, drink and independent retail offers.
- Ramsbottom has cultivated a visitor economy linked to heritage, tourism and independent businesses.
- Radcliffe and Tottington face more pronounced regeneration challenges but have opportunities linked to housing growth and local service provision.

3.52 While vacancy rates in Bury have historically compared favourably to some national averages, pressures remain evident in secondary retail areas and in larger former department store units. Overall, the borough's centres show relative resilience but remain vulnerable to continued retail contraction. We comment in more detail on these key elements as part of the healthcheck work below.

3.53 The changing commercial climate implies that Bury's town centres must evolve from traditional shopping destinations into diverse community and economic hubs. Retail will remain important, but as part of a broader ecosystem that includes leisure, culture, residential living and flexible workspace.

3.54 Success will depend on:

- Continued public sector leadership and targeted investment.
- Encouraging small and independent enterprises.
- Enhancing public realm and accessibility.
- Strengthening town centre identity and place branding.

3.55 In conclusion, while structural retail decline presents challenges, Bury's town centres possess significant assets — notably strong transport links, heritage character and established markets — that position them well for adaptation. With strategic diversification and sustained regeneration, they can remain vibrant and economically resilient in a changing commercial landscape.

3.56 Whilst the growth of online retailing is likely to have had a detrimental impact on the turnover of Bury's 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.

3.57 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.

3.58 Given the above, it is important that there is more emphasis on a wider range of uses within the defined centres in Bury, 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.

3.59 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.

4. Healthcheck Overview

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 The assessments are based on a site visit which was undertaken in November 2025. These assessments should be taken as a 'snapshot' of the performance of each centre at a moment in time. Full copies of the healthchecks for Bury, Radcliffe, Prestwich, Whitefield, Ramsbottom and Tottington are provided at **Appendix 1** and a summary of our findings are provided below.

4.4 For the purposes of this report, we have used the draft local plan hierarchy, which is outlined below:

- **Bury** - Sub-regional town centre;
- **Radcliffe** - Other town centres;
- **Prestwich** - Other town centres;
- **Ramsbottom** - Other town centres;
- **Sedgley Park** – District centre;
- **Tottington** - District centre; and
- **Whitefield** - District centre.

Bury Sub-regional Centre

Table 4.1 Composition of Bury Sub-regional Centre

GOAD Category	Floorspace at 2025(sq.m)	Floorspace at 2025 (%)	Floorspace UK Average at 2025 (%)	Units at 2025 (no.)	Units at 2025 (%)	Units UK Average at 2025 (%)
Comparison	76,462	47.9%	28.7%	182	35.1%	26.1%
Convenience	20,049	12.6%	15.3%	43	8.3%	9.3%
Financial Service	5,531	3.5%	6.1%	33	6.4%	7.9%
Leisure Service	36,695	23.0%	27.7%	118	22.8%	26.5%
Retail Service	7,666	4.8%	7.2%	77	14.9%	15.8%
Vacant	13,211	8.3%	14.5%	65	12.5%	14.1%
Total	**159,614**	**100.0%**	**100.0%**	**518**	**100.0%**	**100.0%**

Source: Composition of centre derived from Nexus Planning surveys of November 2025; and UK Average from Experian Goad report of May 2025

4.5 Bury town centre serves as a key retail leisure and service destination within the Borough and functions as an important centre for the wider Greater Manchester area. The town centre accommodates a diverse mix of uses anchored by The Rock and the Mill Gate Shopping Centre, supported by the nationally renowned Bury Market which continues to draw significant footfall. Modern retail, traditional high street environments and a strong independent sector together create a varied and distinctive town centre offer.

4.6 The wider Bury retail area also includes several retail parks, such as Woodfields Retail Park and Moorgate Retail Park, which provide larger format units and bulky goods retailers. These destinations complement the core town centre by widening the range of outlets available and helping retain spending within the borough.

4.7 Bury offers a particularly strong comparison retail offer, significantly above national averages in terms of both units and floorspace. Major national retailers such as Primark, Next, H&M and JD Sports cluster within The Rock and Mill Gate, supported by a wide range of independent non-food traders across traditional streets such as Market Street and Bolton Street.

4.8 Convenience provision is anchored by operators including Tesco, M&S and Iceland, supplemented by a strong independent presence of bakers, butchers and specialist food stores. Together, this provides a balanced and functional convenience offer for residents and visitors.

4.9 Leisure facilities are well represented with cafes, restaurants, pubs and food to go operators distributed across the centre. The presence of cultural attractions, including The Fusilier Museum and The Met Theatre, strengthens Bury's appeal as a visitor destination. The Rock also accommodates major leisure anchors which help support a modest but established evening economy.

4.10 Retail services form an important part of the overall mix, with a strong representation of health and beauty operators in particular. Financial and business services continue to play a role although their presence is slightly below national averages.

4.11 Vacancy levels in Bury remain below UK averages and are dispersed across the centre. Many units are small and undergoing refurbishment, indicating continued investment. The most prominent vacancy is the former Wilko at The Rock which represents a significant reoccupation opportunity due to its size and location.

4.12 Accessibility is a major strength of Bury, with the Metrolink stop and bus interchange positioned at the edge of the retail core and supporting high levels of footfall. The pedestrianised centre is compact and easy to navigate, contributing to strong linked trips between key destinations.

4.13 Environmental quality is generally high with several green spaces including Kay Gardens and Library Gardens. Some secondary streets and service areas are quieter with less lighting and would benefit from future public realm enhancements.

4.14 Overall Bury town centre is a vital and viable centre with a strong retail and cultural offer. Planned investment, including the Mill Gate Regeneration Framework, upgrades to Bury Market, Bury Flexi Hall and improvements to the Interchange, will support continued evolution and help strengthen the town centres long term role as a vibrant and attractive destination.

Radcliffe Town Centre

Table 4.2 Composition of Radcliffe Town Centre

GOAD Category	Floorspace at 2025(sq.m)	Floorspace at 2025 (%)	Floorspace UK Average at 2025 (%)	Units at 2025 (no.)	Units at 2025 (%)	Units UK Average at 2025 (%)
Comparison	6,935	23.6%	28.7%	29	22.0%	26.1%
Convenience	11,189	38.1%	15.3%	11	8.3%	9.3%
Financial Service	2,431	8.3%	6.1%	15	11.4%	7.9%
Leisure Service	4,268	14.5%	27.7%	24	18.2%	26.5%
Retail Service	2,437	8.3%	7.2%	34	25.8%	15.8%
Vacant	2,145	7.3%	14.5%	19	14.4%	14.1%
Total	**29,405**	**100.0%**	**100.0%**	**132**	**100.0%**	**100.0%**

Source: Composition of centre derived from Nexus Planning surveys of November 2025; and UK Average from Experian Goad report of May 2025

4.15 Radcliffe town centre serves as an important local retail leisure and service destination within the borough of Bury, meeting day to day needs for residents and surrounding neighbourhoods. Its character reflects its historic development as a mill town, with activity focused along Blackburn Street and Church Street West supported by Radcliffe Market and strong convenience anchors including Lidl within the centre and ASDA immediately to the south.

4.16 The Goad area of Radcliffe comprises 132 commercial units providing approximately 29,405 sq.m of floorspace. The goad boundary for Radcliffe includes units that are located on the fringes of the centre boundary. These units are included in the figures for Radcliffe, in table 4.2 above.

4.17 Radcliffe's retail offer is primarily oriented towards everyday needs rather than higher order comparison shopping. Convenience provision is particularly strong and significantly above national averages driven by Lidl and the nearby ASDA which together form the main anchors of the centre. This is supported by a mix of smaller independent food shops and convenience operators along Blackburn Street.

4.18 Comparison provision is modest and dominated by small independent retailers offering localised goods such as clothing household items and charity retail. Retail services including hairdressers barbers and beauty salons are a key feature of the town centre and make up a high proportion of units helping to sustain regular repeat visits and daytime activity.

4.19 Leisure uses are comparatively limited but provide a functional mix of cafes takeaways restaurants and pubs that support the daytime and early evening economy. Essential community services including the Primary Care Centre Post Office and Library enhance Radcliffe's role as a community hub and help generate consistent footfall through linked trips.

4.20 Vacancies are dispersed across the centre and while some prominent units remain empty the overall level of floorspace that is vacant sits below national averages indicating that most empty units are smaller in scale. A number of properties are undergoing refurbishment suggesting ongoing investment and future reoccupation potential.

4.21 Radcliffe benefits from strong public transport accessibility with the Metrolink stop and bus station providing frequent connections to Bury Manchester and the wider Greater Manchester network. These transport hubs generate regular footfall and help reinforce Radcliffe's role as a well-connected local centre.

4.22 Significant public sector investment will play a major role in shaping Radcliffe's future. The Radcliffe Civic Hub and Market Quarter scheme represents a transformational opportunity introducing new community leisure and commercial facilities that will increase footfall and enhance the town centres vibrancy. The Green Street residential development will bring new homes and commercial space to a key gateway further broadening the town centres catchment and economic base.

4.23 Overall, Radcliffe functions effectively as a local centre with strong convenience provision and essential services. While comparison and leisure uses are limited and vacancies are evident the extensive regeneration programme provides a major opportunity to diversify the offer improve environmental quality and support a more resilient and vibrant town centre in the years ahead.

Prestwich Town Centre

Table 4.3 Composition of Prestwich Town Centre

GOAD Category	Floorspace at 2025(sq.m)	Floorspace at 2025 (%)	Floorspace UK Average at 2025 (%)	Units at 2025 (no.)	Units at 2025 (%)	Units UK Average at 2025 (%)
Comparison	3,545	12.0%	28.7%	20	14.6%	26.1%
Convenience	12,549	42.5%	15.3%	17	12.4%	9.3%
Financial Service	894	3.0%	6.1%	12	8.8%	7.9%
Leisure Service	7,319	24.8%	27.7%	44	32.1%	26.5%
Retail Service	2,250	7.6%	7.2%	22	16.1%	15.8%
Vacant	2,957	10.0%	14.5%	22	16.1%	14.1%
Total	**29,514**	**100.0%**	**100.0%**	**137**	**100.0%**	**100.0%**

Source: Composition of centre derived from Nexus Planning surveys of November 2025; and UK Average from Experian Goad report of May 2025

4.24 Prestwich is a suburban town centre within the borough, focused along the A56 Bury New Road at and around the junction with Fairfax Road and the Longfield Centre, approximately four miles north of Manchester city centre. The town centre's commercial core runs along Bury New Road, with a mix of retail, service and leisure uses clustered around the Prestwich Metrolink stop, the Longfield Centre and adjoining streets, and shorter stretches of activity extending onto Fairfax Road and nearby side streets. The centre serves established residential neighbourhoods to the east and west, supported by nearby schools, health facilities and parks including Heaton Park, and benefits from strong public transport connectivity to Manchester and Bury.

4.25 Prestwich's retail profile is firmly convenience and service orientated. Convenience uses account for a notably high share of total floorspace compared with national averages, anchored by multiple foodstores including Tesco, M&S Foodhall, Aldi, Iceland and Farmfoods, supplemented by smaller convenience stores and food outlets. This combination supports both main and top up food shopping and ensures that day to day needs within the local catchment are well met.

4.26 Comparison provision is modest in both floorspace and unit terms and sits below UK averages. The comparison offer is largely focused on lower order and specialist goods such as household items, value variety and specialist retail, rather than higher order fashion or bulky goods. Residents are therefore likely to continue to rely on larger centres and retail parks in the wider sub region for a proportion of their non-food shopping.

4.27 Leisure and service uses form a core element of Prestwich's role. Leisure services occupy a slightly above average share of floorspace and units, with a strong emphasis on food and drink. Cafés, restaurants, bars, public houses and hot food takeaways together create a varied offer and help generate activity across the day and into the evening, supported by gyms and fitness studios. Retail services add further breadth, with provision dominated by health and beauty operators such as hairdressers, barbers and beauty salons, alongside opticians, dry cleaning and repair services.

4.28 Financial and business services occupy a relatively small proportion of floorspace but remain present through solicitors, accountants, estate and letting agents and small offices, reinforcing Prestwich's role as a local service hub. The overall mix is characterised by a high proportion of independent businesses alongside a number of national chains including Tesco, M&S Foodhall, Aldi, Iceland, Farmfoods, Home Bargains, Pets at Home, Superdrug, Costa, Greggs, KFC, Timpson, Betfred, Coral, Londis and Premier Inn. This supports a distinctive local character while still providing familiar national operators.

4.29 Vacancies are low by national standards, both in terms of floorspace and units, and are dispersed rather than concentrated in a single area. As such, vacant premises do not define any particular frontage but do present opportunities for targeted qualitative improvement and diversification.

4.30 Prestwich benefits from strong accessibility. The A56 provides direct links to Manchester and Bury and easy access to the M60, while the Prestwich Metrolink stop and frequent bus services along Bury New Road offer good public transport connections. Car parking associated with the Longfield Centre and principal foodstores, together with smaller car parks and on street spaces, supports the town centre's role, although the layout of vehicular access and pedestrian routes can create localised congestion and conflicts at peak times.

4.31 Overall Prestwich performs well as a local convenience, service and leisure centre. Its strong convenience and food and drink offer, extensive health and beauty provision, good public transport access and relatively low vacancy levels underpin its role in meeting the day to day needs of surrounding residential areas. Planned investment through the Your Prestwich programme, including the Fairfax Road Travel Hub and wider Longfield Centre regeneration, provides an opportunity to improve public realm and movement, strengthen the evening offer and consolidate existing strengths over the medium term.

Ramsbottom Town Centre

Table 4.4 Composition of Ramsbottom Town Centre

GOAD Category	Floorspace at 2025(sq.m)	Floorspace at 2025 (%)	Floorspace UK Average at 2025 (%)	Units at 2025 (no.)	Units at 2025 (%)	Units UK Average at 2025 (%)
Comparison	3,735	21.6%	28.7%	33	25.6%	26.1%
Convenience	5,446	31.6%	15.3%	11	8.5%	9.3%
Financial Service	1,373	8.0%	6.1%	11	8.5%	7.9%
Leisure Service	4,392	25.4%	27.7%	43	33.3%	26.5%
Retail Service	1,900	11.0%	7.2%	25	19.4%	15.8%
Vacant	413	2.4%	14.5%	6	4.7%	14.1%
Total	**17,259**	**100.0%**	**100.0%**	**129**	**100.0%**	**100.0%**

Source: Composition of centre derived from Nexus Planning surveys of November 2025; and UK Average from Experian Goad report of May 2025

4.32 Ramsbottom is one of Bury’s town centres, with a mix of retail leisure and service uses that provides a distinctive offer reflecting its role as both a local shopping destination and a visitor hub. The defined town centre has a compact linear core focused along Bridge Street and Bolton Street, supported by a network of smaller intersecting streets. It serves the day-to-day needs of its local residential catchment while also attracting visitors from across Greater Manchester and beyond through its independent businesses, strong food and drink offer and heritage assets such as the East Lancashire Railway.

4.33 Ramsbottom has a strong convenience offer relative to national averages, anchored by Morrisons on Railway Street together with Aldi and Tesco Express within the centre. These stores meet weekly and top up food shopping needs and generate consistent footfall. The weekly Ramsbottom Saturday Market adds to the convenience offer and brings local and specialist food traders into the town centre, reinforcing its role as a practical shopping destination.

4.34 Comparison retailing is smaller in scale but is characterised by a significant independent presence. Specialist and non-food retailers including homeware shops, gift boutiques, clothing and accessory stores and niche traders are focused along Bolton Street, Bridge Street and surrounding streets. This independent comparison offer supports Ramsbottom’s visitor appeal and contributes to its distinctive identity, offsetting the more limited representation of national multiples.

4.35 Leisure and hospitality uses are a major strength. Cafés, restaurants, pubs, bakeries, delis and takeaways account for a substantial share of units and are spread across the core area, underpinning both daytime and evening activity. Many operators cater specifically for visitors drawn by the East Lancashire Railway and the wider landscape setting, helping to sustain a busy weekend economy and a strong cafe and dining culture.

4.36 Retail services, particularly hair and beauty operators, barbers and opticians, are also well represented and serve the regular needs of residents, supporting repeat visits and reinforcing the centres role as an everyday service location. Financial and business services, including estate agents, accountants and solicitors, are present at a scale appropriate to a town of this size and help maintain weekday activity.

4.37 Vacancy levels are very low and significantly below national averages in both floorspace and unit terms. Only a small number of premises were vacant at the time of survey, indicating healthy demand and contributing to a strong and continuous streetscape. Opportunities for major new development within the defined town centre are limited by its compact historic form and low vacancy rate.

4.38 Instead, future change is expected to focus on qualitative improvements and public realm enhancements guided by the Ramsbottom Town Centre Plan and Streets for All proposals. These include improvements to the eastern gateway between car parks, the railway station and the retail core, the remodelling of Market Place as a flexible civic space, and better integration of the River Irwell and surrounding landscape. Transport and streetscape interventions, including reduced traffic speeds and improved crossings, aim to make it easier to walk and cycle around the centre.

4.39 Overall Ramsbottom is a vital and viable town centre with a distinctive blend of local service and visitor functions. Strong convenience anchors, a high-quality independent comparison and hospitality offer, very low vacancies and good environmental quality together underpin its role as one of the boroughs strongest centres and provide a robust platform for its continued success.

Tottington District Centre

Table 4.5 Composition of Tottington District Centre

GOAD Category	Floorspace at 2025(sq.m)	Floorspace at 2025 (%)	Floorspace UK Average at 2025 (%)	Units at 2025 (no.)	Units at 2025 (%)	Units UK Average at 2025 (%)
Comparison	326	9.6%	28.7%	4	13.8%	26.1%
Convenience	830	24.4%	15.3%	3	10.3%	9.3%
Financial Service	355	10.4%	6.1%	5	17.2%	7.9%
Leisure Service	1,027	30.2%	27.7%	6	20.7%	26.5%
Retail Service	753	22.2%	7.2%	9	31.0%	15.8%
Vacant	108	3.2%	14.5%	2	6.9%	14.1%
Total	**3,400**	**100.0%**	**100.0%**	**29**	**100.0%**	**100.0%**

Source: Composition of centre derived from Nexus Planning surveys of November 2025; and UK Average from Experian Goad report of May 2025

4.40 Tottington is a small district centre that serves the day-to-day shopping and service needs of its local residential catchment within the northern part of the Borough. The centre complements larger nearby centres such as Bury and Ramsbottom rather than competing with them for higher-order retail, leisure or visitor functions. The defined district centre has a compact and largely linear form focused along Market Street, which accommodates the majority of shops and services and functions as the centre’s primary commercial spine.

4.41 The centre’s retail offer is strongly convenience-led, reflecting its role as a practical and accessible location for everyday shopping. Convenience provision is anchored by the Co-op foodstore, which meets both weekly and top-up food shopping needs and acts as a key generator of footfall. This offer is supplemented by smaller independent operators providing everyday essentials, reinforcing Tottington’s importance in meeting routine shopping needs for nearby residents.

4.42 Comparison retailing plays a more limited role within Tottington District Centre and is below national averages Non-food retail provision is characterised by small, independent businesses serving local and specialist needs, rather than higher-order or destination shopping. As a result, comparison retail does not form a primary driver of footfall, with residents typically accessing a wider comparison offer in larger nearby centres, particularly Bury town centre.

4.43 Retail services represent a defining characteristic of Tottington District Centre. A high proportion of units are occupied by service-based uses, including hairdressers, barbers, beauty salons and other personal services. These uses support regular, repeat visits throughout the week, contributing positively to daytime footfall and reinforcing the centre's role as a local service hub. Financial and business services are also well represented at a scale appropriate to a district centre, supporting weekday activity and local employment.

4.44 Leisure and hospitality uses form a meaningful but not dominant component of the centre's offer. Cafés, takeaways, public houses and small restaurants are dispersed along Market Street and help to sustain activity beyond core shopping hours. While Tottington does not function as a leisure or evening destination, these uses provide a modest evening economy that complements the centre's convenience- and service-led role.

4.45 Vacancy levels within Tottington District Centre are low and below national averages, the two vacant units are small in scale and dispersed across the centre. As a result, vacancy does not detract from the continuity or overall attractiveness of the primary frontage. Opportunities for large-scale redevelopment within the district centre itself are limited by its compact form and high occupancy.

4.46 Future opportunities are focused on improvements to accessibility, movement and the public realm. Wider borough strategies identify Market Street as a key corridor where enhancements to pedestrian, cycling and crossing facilities could improve connectivity, safety and ease of movement, helping to support footfall and linked trips within the centre.

4.47 Overall, Tottington District Centre is a vital and viable local centre that performs an important community function. Its strong convenience offer, high concentration of retail and professional services, low vacancy levels and good environmental quality underpin its resilience and support its continued role in meeting the everyday needs of its surrounding residential catchment.

Sedgley Park District Centre

Table 4.5 Composition of Sedgley Park District Centre

GOAD Category	Floorspace at 2025(sq.m)	Floorspace at 2025 (%)	Floorspace UK Average at 2025 (%)	Units at 2025 (no.)	Units at 2025 (%)	Units UK Average at 2025 (%)
Comparison	755	22.4%	28.7%	11	19.6%	26.1%
Convenience	226	6.7%	15.3%	7	12.5%	9.3%
Financial Service	700	20.8%	6.1%	11	19.6%	7.9%
Leisure Service	508	15.1%	27.7%	9	16.1%	26.5%
Retail Service	833	24.7%	7.2%	12	21.4%	15.8%
Vacant	345	10.3%	14.5%	6	10.7%	14.1%
Total	**3,367**	**100.0%**	**100.0%**	**56**	**100.0%**	**100.0%**

Source: Composition of centre derived from Nexus Planning surveys of November 2025; and UK Average from Experian Goad report of May 2025

4.48 Sedgley Park is a district centre located along Bury New Road (A56), forming a predominantly linear centre that serves surrounding residential neighbourhoods. Activity is focused along the main road frontage, with a mix of retail, service and community uses providing day-to-day facilities for the local population.

4.49 The centre has a strongly service-led character. Retail service uses represent the largest use of the centre in both unit and floorspace terms and are significantly above national averages. Services such as hair and beauty operators, opticians and other day-to-day service providers are well represented. Financial and business services are also notably above national averages, indicating that the centre performs an important role as a local professional and service hub, accommodating estate agents, solicitors, offices and health-related services.

4.50 Comparison provision is more limited and below national averages. The offer focuses on lower-order and specialist goods rather than national multiples such as antique and gift shops. Residents are therefore likely to look to larger centres such as Prestwich, Bury town centre or Manchester city centre for a significant proportion of higher-order comparison shopping.

4.51 Convenience provision is modest overall. While there is representation of small-scale food and convenience operators, the relatively limited floorspace suggests the absence of a large-format foodstore. The centre therefore appears to serve primarily top-up and day-to-day shopping needs rather than main food shopping trips.

4.52 Leisure uses are present but below national averages. Provision is likely to consist mainly of cafés, takeaways and smaller restaurants rather than destination leisure operators. These uses add some vitality beyond core daytime hours but do not dominate the overall role of the centre.

4.53 Vacancy levels are below national benchmarks and do not appear to be concentrated in a single location. This indicates a relatively stable centre with no clear evidence of widespread structural decline.

4.54 In accessibility terms, Sedgley Park benefits from its prominent position on Bury New Road, providing strong connectivity between Manchester and Bury, supported by frequent bus services. The surrounding residential catchment is within walking distance. However, as with many linear centres located on arterial routes, traffic movement and servicing activity can affect pedestrian comfort and the overall quality of the environment.

4.55 Overall, Sedgley Park functions as a stable and service-focused district centre. Its strength lies in its concentration of personal, professional and community services, supported by modest convenience and comparison provision. Vacancy levels are relatively contained, and the centre continues to perform an important local role in meeting everyday needs of the surrounding population.

Whitefield District Centre

Table 4.6 Composition of Whitefield District Centre

GOAD Category	Floorspace at 2025(sq.m)	Floorspace at 2025 (%)	Floorspace UK Average at 2025 (%)	Units at 2025 (no.)	Units at 2025 (%)	Units UK Average at 2025 (%)
Comparison	1,404	5.7%	28.7%	13	10.7%	26.1%
Convenience	9.725	39.8%	15.3%	9	7.4%	9.3%
Financial Service	1,126	4.6%	6.1%	13	10.7%	7.9%
Leisure Service	9,389	38.4%	27.7%	41	33.6%	26.5%
Retail Service	2,156	8.8%	7.2%	33	27.0%	15.8%
Vacant	642	2.6%	14.5%	13	10.7%	14.1%
Total	**24,443**	**100.0%**	**100.0%**	**122**	**100.0%**	**100.0%**

Source: Composition of centre derived from Nexus Planning surveys of November 2025; and UK Average from Experian Goad report of May 2025

4.56 Whitefield is a suburban town centre within the Metropolitan Borough of Bury, located on the A56 Bury New Road approximately four miles north of Manchester city centre. The centre has a linear form focused along Bury New Road between Besses o’ th’ Barn in the south and Elms Square in the north, serving surrounding residential neighbourhoods with a mix of retail, service, leisure and community uses. Commercial activity is concentrated along Bury New Road and around key nodes including Victoria Square, Elms Square and the Metrolink stop, with food store anchors Aldi and Morrisons supported by a wide range of independent shops, cafes, bars, takeaways and service businesses.

4.57 Whitefield’s offer is strongly convenience and service focused. Convenience uses account for almost 40 percent of total floorspace, significantly above national averages, and are anchored by Morrisons and Aldi at either end of the centre, supported by smaller convenience stores, chemists and a limited number of specialist food shops. This combination provides for both main and top up food shopping and ensures that everyday needs are well served.

4.58 Comparison provision is modest in both floorspace and unit terms and well below national benchmarks. The comparison units that are present tend to focus on lower order and specialist goods such as carpets and flooring, cycles, sports and leisure goods, floristry and textiles. As such, residents are likely to continue to look to higher order centres such as Bury and Manchester city centre for a significant share of their non-food shopping.

4.59 Leisure and service uses form the core of Whitefield’s wider role. Leisure services account for just under 40 percent of floorspace and around one third of units, notably above UK averages. Restaurants, cafes, bars, public houses and takeaways are complemented by a cluster of gyms and health clubs, including larger operators such as Total Fitness and a range of smaller fitness and wellbeing studios. Together these uses generate activity throughout the day and into the evening.

4.60 Retail services are another defining feature of the centre, accounting for over a quarter of all units. Provision is dominated by health and beauty operators, including numerous hairdressers, barbers and beauty salons, with additional support from opticians, dry cleaners and other personal service uses. Financial and business services, including solicitors, accountants, small offices and estate agency activity, are slightly above national average in unit terms and contribute to Whitefield’s role as a local service hub. Medical and wellbeing services, religious institutions and community facilities further strengthen this role.

4.61 Vacancy levels are low by national standards in both unit and floorspace terms and are dispersed rather than concentrated in a single area. Vacant units therefore do not currently define any particular frontage, although individual empty premises provide scope for qualitative improvement and diversification.

4.62 Whitefield benefits from good accessibility. Bury New Road provides direct road connections to Manchester and Bury, while the adjacent Whitefield Metrolink stop and frequent bus services offer strong public transport links. Car parking associated with the main food stores and smaller car parks and on street spaces is generally adequate, though traffic dominance along Bury New Road can create a less comfortable environment for pedestrians and cyclists.

4.63 Overall, Whitefield performs well as a local convenience, service and leisure centre. Strong foodstore provision, an extensive health and beauty and wider service offer, relatively low vacancy levels and good public transport accessibility underpin its role in meeting the day-to-day needs of surrounding residential areas. Planned investment through the Whitefield Town Centre Plan, including public realm improvements, greener streets and better connections to nearby parks, presents an opportunity to address challenges around townscape quality and movement and to consolidate the centre’s existing strengths.

5. Out of Centre Provision

5.1 We set out below a review of the role, function and current performance of the principal larger out of centre retail destinations in Bury. Considering the offer of the out of centre provision within the authority is an important element of considering appropriate impact threshold policy recommendations, given the potential implications out of centre development can have on the future vitality and viability of defined centres.

5.2 The retail parks are set out in Table 5.1 below.

Table 5.1: Retail Parks in Bury

Retail Park	Location	Size	Key Operators
Woodfields Retail Park	Bury 0.8km to the Bury town centre	13,563 sq.m	Tesco, Boots, JD, Currys, McDonald's, Sports Direct and Millets.
Angouleme Retail Park, George Street	Bury 0.6km to central Bury	7,084 sq.m	TK Maxx, Argos, Brand Interiors, Jysk
Mill Retail Park, Foundry Street	Bury 0.6km to central Bury	3,770 sq.m	Smyths, Pets at Home, Bensons for Beds
Bridge Hall Lane – B&Q	Bury 2.4km from Bury town centre	9,300 sq.m	Solus B&Q and Burger King drive-thru.
Park 66	Bury 3.2km from Bury town centre	6,038 sq.m	Home Bargains, The Food Warehouse, Greggs, KFC, Costa
Moorgate Retail Park	Bury 1km to central Bury	4,817 sq.m	Home Bargains, Halfords, Farmfoods and KFC.
Crostons Retail Park	Bury 1.2km from Bury town centre	5,574 sq.m	Home Bargains, B&Q and Aldi
Riverside Retail Park (Pilkington Way)	Radcliffe 0.5km to the eastern edge of Radcliffe town centre	2,750 sq.m	Asda, McDonald's, Big Art and Banners

Source: Completely Retail

5.3 In total, there are eight retail parks within the Bury area, providing a mix of comparison, convenience and wider food and beverage and leisure offers.

5.4 The retail park offer within the Bury authority area is varied, comprising a mix of established retail parks that traditionally cater for bulky goods retailing (such as furniture, electrical goods and DIY) alongside parks that have evolved to accommodate a broader non-bulky retail offer, including fashion, homewares, health and beauty, and comparison goods retailers. Several retail parks are anchored by large format foodstores and discount supermarkets, complemented by an increasing presence of food and drink and leisure uses. Collectively, these retail parks function as out-of-centre destinations serving a wider catchment, offering car-based accessibility and modern retail formats that differ in role and function from Bury town centre.

5.5 The largest retail park in the authority area is Woodfields Retail Park, which provides a mixed comparison and convenience offer, providing space for clothing retailers, alongside the more traditional 'bulky' operators such as Currys. The Tesco store is the largest operator on the site, with a McDonald's fronting on to Peel Way. The retail park is located just to the north of Bury town centre boundary, with links across Peel Way. The largest unit on the retail park is occupied by Tesco, with the smallest unit being occupied by Millets and which forms part of a larger unit occupied by JD Sports.

5.6 The smallest retail park is Mill Retail Park, Foundry street (3,770 sq.m), which provides for a Smyths Toys, Pets at Home and Bensons for Beds only. It is predominantly a ‘bulky’ destination, with the addition of the Smyths Toys providing an element of the more traditional ‘town centre’ retailing. Car parking is available for approximately 100 spaces.

5.7 The second smallest is Moorgate Retail Park in Bury providing circa 4,817 sq.m of commercial floorspace across four retail units and a smaller food and beverage unit. It is located at the junction of Moorgate and Derby Street/Peel Way Inner Relief Road directly opposite to The Rock Shopping Centre. The retail park includes Home Bargains, Halfords, Farmfoods and KFC, with the largest operator being Home Bargains. The retail park is served by approximately 280 adjacent car parking spaces.

5.8 The Angouleme Retail Park is located to the east of Angouleme Way within the defined town centre boundary for Bury. The retail park comprises circa 7,084 sq.m of commercial floorspace and includes operators such as TK Maxx, Argos and Brand Interiors.

5.9 It is clear from the above, that the retail parks provide a variety of scales of retail and leisure units, typically providing larger floorspaces for key operators. In some cases, the retail parks and solus retail destinations are anchored by convenience operators, with adjacent comparison uses providing a mix of retailers to the wider catchments.

5.10 There are also instances of ‘typical’ town centre operators occupying units at the retail parks, including Boots, JD at Woodfields Retail Park and TK Maxx and Argos at Angouleme Retail Park. Overall, the retail parks provide important facilities to the residents of Bury and further afield, comprising larger, modern footprints which are particularly attractive to operators.

6. Policy Recommendations

Context

6.1 The principal purpose of the commission was to better understand the ongoing challenges for Bury's high streets and opportunities for their revitalisation and reimagining, and to set out a range of strategic policy recommendations to assist the preparation of the Bury Local Plan.

6.2 Bury covers the geographical areas of Bury, Radcliffe, Prestwich, Ramsbottom, Tottington and Whitefield which function as one integrated local economy and commuting area. It is a single housing market area with high levels of self-containment, or families moving within the area. It is therefore appropriate to work strategically in collaboration to ensure our policy is joined up and complementary.

6.3 As part of this process, the Council will be updating the policies of relevance to town centre and retail planning including matters such as the hierarchy of defined centres and local impact thresholds for retail and leisure developments.

6.4 The Study has been underpinned by a range of on-site surveys within the defined centres, in order to better understand the current vitality and viability of centres and to provide defensible recommendations to the Council in respect of the future formulation of planning policies.

6.5 As such, the purpose of this final section of the Study is to provide an overview of the recommendations formed as part of this Study, both on a centre-by-centre basis but also in terms of the overarching policy objectives which we consider should form an important role within the new Local Plan.

6.6 We address a series of planning policy considerations below of relevance to the emerging Bury Local Plan. We also provide comments in respect of the draft policy wording.

Impact Thresholds

6.7 Paragraph 94 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 development, which should be the subject of an impact assessment. Any such threshold policy applies only to the impact test (most[14] 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 be the subject of the sequential test).

6.8 The purpose of applying an impact threshold within the development plan which deviates from the national threshold of 2,500 sq.m for retail and leisure proposals, 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 areas. By applying a lower threshold, applications for developments which could potentially have a harmful effect on the overall vitality and viability of a defined centre, will need to be supported by a proportionate impact assessment which sets out the potential trade diversion impact assumptions.

6.9 Paragraph 16 of the Town Centres PPG provides specific guidance in relation to floorspace thresholds and states:

[14] Paragraph 93 of the NPPF states that the sequential approach should not be applied to applications for small scale rural offices or other small scale rural development

'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**
- **existing viability and vitality of town centres**
- **cumulative effects of recent developments**
- **whether local town centres are vulnerable**
- **likely effects of development on any town centre strategy**
- **impact on any other planned investment.'**

6.10 Using the above guidance, we set out the justification to support our view that lower thresholds should be applied across the hierarchy of centres within Bury. To note, the local authority does not currently have a lower than national impact threshold.

6.11 In accordance with national policy, we would advise that the thresholds adopted apply to all retail and leisure development across the board, instead of different thresholds for retail and leisure. This is due to the importance of both types of uses in supporting the future vitality and viability of centres, and the wide range of unit sizes occupied by both retail and leisure operators.

6.12 Importantly however, national policy no longer requires applications for office development outside of centres to be supported by an impact assessment (but should be supported by a sequential test).

6.13 Annex 2 of the NPPF provides a definition of 'main town centre uses' which includes both retail and leisure uses. The definition states:

'Main town centre uses: 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).'

Methodology and Justification

6.14 We provide an overview below of the key considerations in respect of the overarching offer of the defined centres in Bury, which has assisted in providing the overarching policy recommendations. We begin by providing an overview of the scale of proposals relative to the defined centres.

Scale of Proposals Relative to Defined Centres

Total Floorspace

6.15 The total gross retail floorspace by each centre, broken down by convenience and comparison goods retailing, is set out in Table 6.1 below. These figures are taken from the comprehensive town centre surveys undertaken by Nexus Planning and detailed in Section 5 of this Study. The survey areas are based upon the full extent of the ground floor area of all units in 'main town centre use' within the boundary of each centre.

Table 6.1: Total Retail Floorspace in the Centres

Centre	Floorspace (sq.m)		Total (sq.m)
	Convenience	Comparison	
Bury	20,049	76,462	96,511
Prestwich	12,549	3,545	16,094
Radcliffe	11,189	6,935	18,124
Ramsbottom	5,446	3,735	9,181
Sedgley Park	226	755	981
Tottington	830	326	1,156
Whitefield	9,725	1,404	11,129

6.16 Table 6.1 demonstrates that Bury town centre is the largest in the authority area, with the majority of this floorspace occupied by comparison retailers (79.2%). Radcliffe and Prestwich are the second and third largest centres, followed by Whitefield. In each of these cases, the retail floorspace is occupied by a greater proportion of convenience operators instead of comparison operators, indicating the focus of convenience retailing in the smaller centres. In each case, retailing is a core element of the overarching provision of the centres, demonstrating its importance to helping to support the overarching vitality and viability of the centres.

Typical Unit Sizes

6.17 The breakdown of unit size by each centre is set out in Table 6.2 below. These have not been split into convenience and comparison units and instead looks more holistically at the retail offer in the centres. The data in general highlights that the stock of retail property in Bury is very much dominated by smaller units.

Table 6.2: Average Unit Sizes in Defined Centres

Centre	<200 sq.m 200-299 sq.m 300-499 sq.m						500-999 sq.m 1,000 – 1,499 sq.m >1,500 sq.m						Total
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	
Bury	357	68.9%	60	11.6%	41	7.9%	31	6.0%	7	1.4%	22	4.2%	518
Prestwich	102	74.5%	15	10.9%	12	8.8%	4	2.9%	2	1.5%	2	1.5%	137
Radcliffe	110	83.3%	11	8.3%	3	2.3%	4	3.0%	1	0.8%	3	2.3%	132
Ramsbottom	119	92.2%	2	1.6%	4	3.1%	1	0.8%	1	0.8%	2	1.6%	129
Sedgley Park	48	85.7%	5	8.9%	1	1.8%	0	0.0%	1	1.8%	1	1.8%	56
Tottington	27	90.0%	0	0.0%	2	6.7%	1	3.3%	0	0.0%	0	0.0%	30
Whitefield	104	85.2%	11	9.0%	4	3.3%	0	0.0%	0	0.0%	3	2.5%	122

6.18 Table 6.2 highlights in particular that the smaller centres in the local authority area are dominated heavily by the smaller units (less than 200 sq.m), with Radcliffe, Ramsbottom, Sedgley Park, Tottington and Whitefield all consisting of more than 80% of the units measuring less than 200 sq.m.

6.19 Both Prestwich and Bury centres also consist of high proportions of small units, with 74.5% in Prestwich and 68.9% in Bury. In these two centres, just over 10% of units measure between 200 and 299 sq.m, with approximately 8%

measuring between 300 and 499 sq.m. As would be expected, Bury has the highest proportion of units measuring over 1,500 sq.m at 4.2%.

6.20 The figures in Table 6.2 demonstrate the importance of smaller units within the defined centres of Bury.

Overarching Vitality and Viability of the Centres

6.21 The work undertaken to inform this Study has also included an up to date, comprehensive healthcheck assessment of each of the principal defined centres in the authority area.

6.22 The healthchecks considered a wide range of indicators, and a summary of the key findings for each centre are set out below.

Table 6.3: Summary of Healthchecks for the Defined Centres

Centre	Healthcheck Summary
Bury	Overall, Bury town centre is a vital and viable centre with a strong retail and cultural offer. Planned investment, including the Mill Gate Regeneration Framework, upgrades to Bury Market and improvements to the Interchange, will support continued evolution and help strengthen the town centres long term role as a vibrant and attractive destination.
Prestwich	Prestwich performs well as a local convenience, service and leisure centre. Its strong convenience and food and drink offer, extensive health and beauty provision, good public transport access and relatively low vacancy levels underpin its role in meeting the day to day needs of surrounding residential areas. Planned investment through the Your Prestwich programme, including the Fairfax Road Travel Hub and wider Longfield Centre regeneration, provides an opportunity to improve public realm and movement, strengthen the evening offer and consolidate existing strengths over the medium term.
Radcliffe	Radcliffe functions effectively as a local centre with strong convenience provision and essential services. While comparison and leisure uses are limited and vacancies are evident the extensive regeneration programme provides a major opportunity to diversify the offer improve environmental quality and support a more resilient and vibrant town centre in the years ahead.
Ramsbottom	Ramsbottom is a vital and viable town centre with a distinctive blend of local service and visitor functions. Strong convenience anchors, a high-quality independent comparison and hospitality offer, very low vacancies and good environmental quality together underpin its role as one of the boroughs strongest centres and provide a robust platform for its continued success.
Sedgley Park	Sedgley Park functions as a stable and service-focused district centre. Its strength lies in its concentration of personal, professional and community services, supported by modest convenience and comparison provision. Vacancy levels are relatively contained, and the centre continues to perform an important local role in meeting everyday needs of the surrounding population
Tottington	Overall, Tottington district centre is a vital and viable centre that performs an important community function. Its strong convenience offer, high concentration of retail and professional services, low vacancy levels and good environmental quality underpin its resilience and support its continued role in meeting the everyday needs of its surrounding residential catchment

Centre	Healthcheck Summary
Whitefield	Whitefield performs well as a convenience, service and leisure centre. Strong foodstore provision, an extensive health and beauty and wider service offer, relatively low vacancy levels and good public transport accessibility underpin its role in meeting the day-to-day needs of surrounding residential areas. Planned investment through the Whitefield Town Centre Plan, including public realm improvements, greener streets and better connections to nearby parks, presents an opportunity to address challenges around townscape quality and movement and to consolidate the centre's existing strengths.

6.23 In light of the above, we are of the view that a lower threshold for the defined centres should be adopted, on the basis of the following conclusions:

- Bury and the smaller defined 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 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.
- Bury's 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 defined centres. Accordingly, in the local context, 300 sq.m constitutes a significant unit with the potential to result in an impact on shopping patterns.

Recommended Policy Approach

6.24 In considering the setting of a local impact threshold, it is important 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 act to 'anchor' a centre. Should one of these anchor units or operators leave a centre, there will likely be the potential for a significant adverse impact to arise.

6.25 In terms of retail proposals, typical 'anchors' comprise foodstores which range from those of a medium scale (approximately 2,000 sq.m gross upwards) and larger format comparison units (approximately 500 sq.m upwards). The typical leisure 'anchors' of centres can also vary in terms of scale, which includes prime food and beverage operators, up to the larger format leisure uses such as cinemas, ten pin bowling and other competitive socialising uses. In both cases, the range of unit sizes is broadly comparable and the draw of such uses will be key to help support the health of centres moving forward.

6.26 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.

6.27 Where an application proposal is above the respective stated impact threshold, we would recommend that the applicant discusses and agrees the scope of the retail impact assessment with the relevant Council prior to submission. 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.

6.28 We therefore recommend that a 500 sq.m impact threshold should effectively act as default to be applied authority-wide and in respect of Bury as the sub-regional town centre, should a proposal not be subject to a lesser threshold of relevance to smaller centres.

6.29 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.

6.30 Given the character of such operations and their importance to the smaller centres assessed, we recommend that an impact threshold of 300 sq.m is applicable to retail and leisure proposals in proximity to the 'other town centres' and district centres.

6.31 The lower threshold of 200 sq.m for local centres is considered appropriate due to potential for convenience stores of even a relatively small nature to substantially impact upon the performance of existing operators, due to the potential higher sales densities of such proposals. This would ensure that particular protection of these smaller centres is considered appropriately.

6.32 For the purpose of drafting future planning policy, it is important to qualify the area to which each local impact threshold will apply. We recommend that the threshold of relevance to the town and district centres (i.e. 300 sq.m) and local centres (i.e. 200 sq.m) would be applicable within 800 metres of the boundary of the relevant centre. The distance of 800 metres is broadly commensurate with the potential walk-in catchments of smaller centres and is identified by Guidelines for Providing for Journeys on Foot (The Institution of Highways & Transportation, 2000) as being the 'preferred maximum' acceptable walking distance to a centre.

6.33 For clarity, we consider it to be appropriate for the higher threshold of 500 sq.m to apply across Bury when the centre-specific thresholds do not apply (i.e. beyond 800 metres of these centres), due to the lesser likelihood of significant adverse impacts arising from retail and leisure development. This general 500 sq.m threshold would therefore apply to proposals outside of the 800 metre boundary of the defined centres due to the lesser likelihood of the proposals having an impact.

6.34 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.

6.35 Based on the above, we are of the view that an impact assessment will be necessary to accompany proposals for retail and leisure uses (including those relating to mezzanine floorspace and the variation of restrictive conditions) which are not located within a defined centre where:

1. the proposal provides a gross floorspace in excess of 500 sq.m gross; or
2. the proposal is located within 800 metres of either;
    a) an 'other' town or district centre and is in excess of 300 sq.m gross; or,
    b) a local centre and is in excess of 200 sq.m gross.

6.36 In our experience, it will only generally be development of a scale greater than these thresholds which could lead to a 'significant adverse' impact, which could merit the refusal of an application for town centre uses in accordance with the provisions of paragraph 95 of the NPPF. The setting of a 'tiered' threshold is consistently accepted by Inspectors at Local Plan Examination and, in our view, acts to appropriately ensure that only those proposals which could genuinely result in an unacceptable impact are the subject of an impact assessment.

Hierarchy

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

6.38 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.

6.39 Annex B of PPS4 identifies that:

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

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

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

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

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

6.40 Our findings from the review of the health of the defined centres within the authority areas has found that:

- Bury is performing an important principal town centre role within the borough, 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.
- Ramsbottom, Radcliffe and Prestwich town centres also continue to perform important roles to residents in the authority area, but on a smaller scale.
- Tottington, Whitefield and Sedgley Park are performing important smaller district centre roles within the borough, with a variety of smaller-scale commercial operators present, alongside convenience stores.

6.41 We provide the recommended centres hierarchy below in Table 6.4.

Table 6.4: Recommended Centres Hierarchy

Tier	Centres
Sub Regional Town Centre	Bury town centre
Other Town Centres	Ramsbottom Radcliffe Prestwich town centres
District Centres	Tottington Whitefield Sedgley Park
Local Centres	1. Bolton Road West/Bolton Street (9-30 Bolton Road West &198-208 Bolton Street) 2. Holcombe Brook Precinct (1-21) 3. Ainsworth Village (5, 10-12, 23 Church Street) 4. Tottington Road (288-332 Tottington Rd) 5. Walmersley Road (8-61 Walmerlsey Rd) 6. Bolton Road (89-107 Bolton Rd)/Victoria Retail Park 7. Parkhills Road (2-20 Parkhills Rd) 8. Radcliffe/Water Street (74-86 Water Street & 3-19 Ainsworth Rd) 9. Sunnybank Road (60-97 Sunnybank Rd) 10. Unsworth/Parr Lane (59-73, 105-113 Parr Lane) 11. Bury Old Road (36-92 Bury Old Rd) 12. Bury Old Road (454-486 Bury Old Rd) 13. Bury Old Road (363-389 Bury Old Rd) 14. Heaton Park Metrolink (191-219 Bury Old Rd & 8-39 Whittaker Lane) 15. Parkhill (6-29 Bury Old Rd) 16. Hawkshaw (263 & 360 Bolton Rd) 17. Greenmount (327-335 Holcombe Rd, 1-11 Brandlesholme Rd) 18. Vernon Road (2-12 Vernon Rd) 19. Higher Summerseat (46-50 Newcombe Rd) 20. Walshaw (4-20 Bank Street) 21. Brandlesholme Road (373-339 Brandlesholme Rd) 22. Bevis Green (2-8 Walmersley Old Rd) 23. Limefield (433-445 Walmersley Rd) 24. Walmerlsey Road (166-184 Walmerlsey Rd) 25. Chesham Road (19-31 Chesham Rd) 26. Chesham Fold Road (87-94 Chesham Fold Rd) 27. Crostons Road (67-75 Croston Rd) 28. Ainsworth Road (90-131 Ainsworth Rd) 29. Mile Lane (66-80 Mile Lane)

Tier	Centres
	30. Colville Drive (2-12 Colville Drive) 31. Bolton Road (301-329 Bolton Rd) 32. Topping Fold (30-52 Topping Fold Rd) 33. Rochdale Road (165-197, 84-104 Rochdale Rd) 34. Parkhills road/Market Street (250-258 Market Street, 98-100 Parkhills Rd) 35. Dorset Drive (51-57 Dorset Drive) 36. Radcliffe Road (115-123 Radcliffe Rd) 37. Radcliffe Road (167-175 Radcliffe Rd) 38. Radcliffe New Road (165-171 Radcliffe New Rd) 39. Redvales Road (33-39 Redvales Rd) 40. Tennyson Avenue (2-22 Tennyson Avenue) 41. Hollins Lane (308-312 Hollins Lane) 42. Manchester Road (842-852 Manchester Rd) 43. Bury New Road (327-337 Bury New Rd) 44. Rufford Drive (2-5 Rufford Drive) 45. Parr Lane (376-388 Parr Lane) 46. Ribble Drive/Albert Place (1-14 Albert Place) 47. Hazel Road (17-31 Hazel Road) 48. Besses O'th'Barn (13-19 Thatch Leach Lane) 49. Bury Old Road (142-154 Bury Old Rd) 50. Cross Lane (128-148 Cross Lane) 51. Dumers Lane (263-283 Dumers Lane) 52. Water Street (5-28 Water Street, 1-4 Seddon Street) 53. Ainsworth Road/Cemetery Road (155-163 Ainsworth Rd) 54. Ainsworth Road/St.Andrews Church (359 Ainsworth Rd, 364 Ainsworth Rd) 55. Moss Shaw Way (16-26 Moss Shaw Way) 56. Coronation Road (129-139 Coronation Rd) 57. Radcliffe Moor Road (23 Radcliffe Moor Rd, 240 Turks Rd) 58. Outwood (141 & 159 Ringley Rd West) 59. Chapel Field (280-288 Stand Lane) 60. Park Lane (83-140 Park Lane) 61. Bury New Road/Willow Road (554-556 Bury New Rd, 511 Bury New Rd) 62. Heywood Road (247-257 Heywood Rd) 63. Heywood Road (97-107 Heywood Rd) 64. Rectory Lane/Whitaker Lane (116 & 135 Rectory Lane) 65. St.Mary's Park (253-259 Bury New Rd) 66. Bury New Road/Scholes Lane (1-5 Scholes Lane, 126-132 Bury New Rd) 67. King’s Road, Sedgley Park (76-84 King's Rd) 68. Butterstile Lane (65-73 Sandy Lane, 136-152 Butterstile Lane) 69. Sandy Lane (16-24 Sandy Lane) 70. Rainsough Brow (1-5 The Woodlands, 1-11 Kersal Rd, 21 Hilton Lane) 71. Windsor Road (65-95 Windsor Rd) 72. Middleton Road (277-295 & 242-252 Middleton Rd)

Review of Draft Bury Policies

6.42 In order to assist the Council in finalising the draft policy position, we have set out below a summary of our policy recommendations against the relevant adopted local planning policy. In doing so, we provide commentary where we consider amendments should be made to policy to reflect the findings of this Study.

Table 6.5: Policy Recommendations Summary Table

Policy No.	Current Policy Wording	Nexus Recommendations
Policy LP-TC1: Hierarchy and role of centres	The Council will seek to maintain and enhance the vitality of the Borough’s hierarchy of town, district and local centres by making them the	The recommended hierarchy of centres is provided in Table 6.4 above.

<table>
<tr><th>Policy No.</th><th>Current Policy Wording</th><th>Nexus Recommendations</th></tr>
<tr><td></td><td>key focus for new development involving main town centre uses.

The Borough's hierarchy and respective roles of centres is as follows:

Sub-regional town centre

Bury - As the Borough's sub-regional centre and most accessible location, Bury town centre will continue its role as the Borough's key location for shopping, services, leisure, tourism and cultural facilities supported by residential, healthcare and educational uses.

Other town centres

• Ramsbottom – will continue to consolidate as a thriving centre based predominantly on its mutually supportive functions as a specialist retail, food and drink, market and tourist destination.
• Radcliffe – will continue to build on town centre regeneration opportunities and environmental improvements, including residential-led opportunities to help consolidate it as a vibrant centre catering primarily for the needs of surrounding communities.
• Prestwich – will continue to regenerate and consolidate as an 'urban village' where people live and work and where the 'village' centre provides the focus for the life of the local community, assisted by the redevelopment of the Longfield Centre.

District centres
The Borough's district centres of Tottington, Whitefield and Sedgley Park will continue to function as largely retail and service centres providing for the needs of local communities.

Local centres
The Borough's local centres will be maintained and enhanced as predominantly retail centres providing for purely local needs.

Neighbourhood Centres
The Borough's neighbourhood centres will be maintained and enhanced as predominantly retail centres providing for the day-to-day needs of local residents and businesses.

Additional local centres will be necessary to serve major population increases arising through the significant new residential/ employment allocations identified in Places</td><td>Overall, we consider that the hierarchy of centres remains appropriate for the authority area, with Bury continuing to perform a sub-regional centre role, being the largest centre in the authority area and with the greatest provision and mix of main town centre uses.

Beyond Bury, the other town centres comprising Ramsbottom, Radcliffe and Prestwich all continue to function as town centres in terms of their offer, scale and draw, and therefore sit within the 'smaller' town centre tier under Bury. We therefore agree with the designation of Ramsbottom, Radcliffe and Prestwich as 'other town centres' as set out under Policy LP-TC1.

We note that the draft policy also includes neighbourhood centres within the hierarchy. Annex 2 of the NPPF makes it clear that 'references to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance'.

In the case of Bury's previously identified local centres and neighbourhood parades, these largely function the same and provide for comparable offers across both previous hierarchies. Given this, it is recommended that all of the local centres and neighbourhood parades are classified as 'local centres' and therefore, there will not be any neighbourhood centres within the local plan.

Given the above, we recommend that the text is amended slightly to make reference to the neighbourhood centres as important local facilities instead of 'centres'.</td></tr>
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Policy No.	Current Policy Wording	Nexus Recommendations
	for Everyone at Walshaw, Elton Reservoir, Heywood/Pilsworth and Simister.	
Policy LP-TC2: Managing the location and scale of main town centre uses	The Council will seek to maintain and enhance the vitality of the Borough's hierarchy of centres by ensuring that proposals for main town centre uses are in an appropriate location and that proposals for retail, leisure and office development are of a scale that would not have significant adverse impacts. **Location** In managing the location of main town centre uses, the Council will require a sequential assessment in conjunction with planning applications involving sites that are not in an existing centre and are not in accordance with the Local Plan. Main town centre uses should be located within existing centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered. **Scale** To ensure that full consideration is given to the scale of development and whether this would have any significant adverse impacts, proposals involving additional retail or leisure development in locations that are not in an existing centre, are not in accordance with the development plan and are in excess of the following thresholds should be accompanied by an Impact Assessment: a. An increase of more than 500 sq.m. (gross) of retail floorspace [Class E(a)] or leisure floorspace; or b. An increase of between 250 sq.m. and 500 sq.m. (gross) of retail floorspace [Class E(a)] where any of the following raise concerns in relation to an existing centre: i. The scale of the proposal relative to the size of the units in the centre; ii. The health and vulnerability of the centre; iii. The nature of the proposal; iv. The potential cumulative effects of recent developments; or v. The likely effects of the proposed development on the implementation of a relevant council strategy or any planned investment in the centre.	We agree with the overarching objective of Policy LP-TC2 to maintain and enhance the vitality and viability of the Borough's hierarchy of centres, by directing main town centre uses to appropriate locations and managing their scale to avoid significant adverse impacts. The emphasis and requirement for proposals for main town centre uses to demonstrate compliance with the sequential approach is consistent with national policy and provides a clear framework for decision-making. **Sequential Approach** In this regard, we support the requirement for a sequential assessment where proposals for main town centre uses are located outside existing centres or are not in accordance with the development plan. The policy appropriately prioritises in-centre locations, followed by edge-of-centre sites, with out-of-centre sites considered only where no suitable or available sites exist. This reflects the guidance set out in the National Planning Policy Framework and Planning Practice Guidance. The only minor recommendations we have are to add the references as provided by paragraphs 92 and 93 of the NPPF, which state that: • When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. • The sequential approach should not be applied to small scale rural offices or other small scale rural development. **Impact** In terms of the impact threshold policy, we recommend some amendments to the current draft to reflect the findings of this Study. In particular, we consider part (b) of the impact assessment policy to be difficult to demonstrate and are of the view that it does not comply with national policy. We therefore recommend that the policy is streamlined to better reflect national policy and guidance but which still provides for a lower impact threshold to reflect the local position. As such, we suggest that impact thresholds which are lower than the national average of 2,500 sq.m are retained, but that these are updated to reflect the composition of the centres, average unit sizes and vacancy rates in accordance with the guidance as set out at paragraph 015 of the Town Centres and Retail Practice Guidance.

Policy No.	Current Policy Wording	Nexus Recommendations
	These thresholds apply to new floorspace, extensions to existing floorspace, changes of use and applications seeking variations to conditions and the extent of the impact assessment should be proportionate to the scale of the development. The Council will refuse applications which fail to satisfy the sequential test or where it considered likely that the proposal would have a significant adverse impact. It should be noted that Policy LP-TC2 also applies to retail uses developed in conjunction with petrol filling stations.	We would advise that the thresholds adopted apply to all retail and leisure development across the board, instead of different thresholds for retail and leisure. This is due to the importance of both types of uses in supporting the future vitality and viability of centres, and the wide range of unit sizes occupied by both retail and leisure operators. Importantly however, national policy no longer requires applications for office development outside of centres to be supported by an impact assessment (but should be supported by a sequential test). It may be worthwhile referencing this in the policy text. In considering the setting of a local impact threshold, it is important 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 act to 'anchor' a centre. Should one of these anchor units or operators leave a centre, there will likely be the potential for a significant adverse impact to arise. In terms of retail proposals, typical 'anchors' comprise foodstores which range from those of a medium scale (approximately 2,000 sq.m gross upwards) and larger format comparison units (approximately 500 sq.m upwards). The typical leisure 'anchors' of centres can also vary in terms of scale, which includes prime food and beverage operators, up to the larger format leisure uses such as cinemas, ten pin bowling and other competitive socialising uses. In both cases, the range of unit sizes is broadly comparable and the draw of such uses will be key to help support the health of centres moving forward. Detailed justification for the recommended local impact thresholds below is provided earlier within the Study. In this regard, we are of the view that an impact assessment will be necessary to accompany proposals for retail and leisure uses (including those relating to mezzanine floorspace and the variation of restrictive conditions) which are not located within a defined centre where: • the proposal provides a gross floorspace in excess of 500 sq.m gross; or • the proposal is located within 800 metres of either; ○ an 'other town centre' or district centre and is in excess of 300 sq.m gross; or,

Policy No.	Current Policy Wording	Nexus Recommendations
		○ a local centre and is in excess of 200 sq.m gross. In our experience, it will only generally be development of a scale greater than these thresholds which could lead to a 'significant adverse' impact, which could merit the refusal of an application for town centre uses in accordance with the provisions of paragraph 95 of the NPPF. The setting of a 'tiered' threshold is consistently accepted by Inspectors at Local Plan Examination and, in our view, acts to appropriately ensure that only those proposals which could genuinely result in an unacceptable impact are the subject of an impact assessment.
Policy LP-TC3: Primary Shopping Areas	The Council will seek to maintain retailing [Class E(a)] as the predominant use at ground floor level within the Primary Shopping Areas of town and district centres. In determining proposals for the change of use at the ground floor level from retail [Class E(a)] to a non-retail use, the Council will have regard to the following factors: a. Whether it would make a positive contribution to the vitality, viability and diversity of the centre; b. Whether it would have an unacceptable adverse impact on daytime footfall; c. Whether it would positively restore and/or enhance the character and appearance of the frontage; d. Whether the scale and type of use is appropriate to the size and function of the centre; e. Whether the proposal will give rise to disturbance or nuisance; and f. Whether the proposal would result in an over concentration of non-retail uses which could adversely change the nature or character of the area.	The NPPF continues to provide a differentiation between the definition of what comprises a Primary Shopping Area, and what comprises the wider town centre. In this regard, there is still an emphasis to seek to encourage the concentration of traditional retail uses (Class E(a)) to Primary Shopping Areas. We therefore consider that an ongoing protection of Primary Shopping Areas is appropriate within the new local plan. The overarching encouragement of active daytime uses, activity and footfall through the heart of the centres should continue and an over-concentration of non-retail uses should be discouraged. However, there will need to be a continued acceptance that centres continue to diversify and therefore alternative uses which do not fall within the standard Class E(a) Use may be appropriate in some circumstances. Given the above, we agree with the thrust of the wording of Policy LP-TC3, which continues the focus of retail uses within the Primary Shopping Areas but provides guidance to enable a degree of flexibility where appropriate.
Policy LP-TC4: Local and neighbourhood centres	The Council recognises the importance of local retail facilities within the Borough's Local and Neighbourhood Centres and in determining proposals for the change of use at the ground floor level from retail [Class E(a)] to a non-retail use, the Council will have regard to the following factors: i. The vitality and viability of the centre and whether this would be benefited by the proposal;	Nexus considers Policy LP-TC4 to be broadly appropriate and that encouraging some town centre uses to the Borough's lower-tiered centres accords with national policy.

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	ii. The particular nature and character of the use proposed, including the level of activity associated with it; iii. That the proposal is appropriate in scale and character to the requirements of the area and necessary to serve local needs which would not otherwise be met; iv. Whether the proposal would result in an over concentration of non-retail uses which could adversely change the nature or character of a centre as a whole; v. The length of time the unit has remained vacant and the viability of a continued Class E(a) use; and vi. Whether or not the locality is adequately served by alternative local shopping facilities within reasonable walking distance.	
Policy LP-TC5: Local shops and services	The Council will seek to retain local shops and services outside recognised centres, particularly where these serve the day-to-day needs of local communities that would otherwise have limited access to such facilities. Where a proposal involves the loss of a vacant shop or service, the Council will expect the applicant to provide robust evidence to demonstrate that the premises have been comprehensively marketed and that there has been no interest in maintaining the premises as a local shop or service.	We agree with the overarching objective of Policy LP-TC5 to retain local shops and services outside recognised centres where these provide an important day-to-day function for local communities, particularly in locations where access to alternative facilities may be limited.
Policy LP-TC6: Upper floors in centres	The Council will support proposals which bring underused and vacant space on upper floors of premises within centres back into beneficial use.	We recommend the retention of Policy LP-TC6 in light of the positive benefits associated with the reuse of upper floors and the associated increase in footfall and available expenditure to businesses.
Policy LP-BE9: Food and Drink Uses	In considering all proposals for restaurants, hot food takeaways, cafes, snack bars, public houses or any other uses involving the sale of food and drink, the Council will have regard to the following factors: a. the amenity of nearby residents by reason of noise, smell, litter and opening hours; b. whether the proposal would result in an over concentration of food and drink uses, which could adversely change the nature or character of a centre as a whole; c. whether the proposal would lead to an unacceptable loss of retail uses and adversely impact on the vitality of a centre; d. whether the proposal has the potential to have a negative impact on health and wellbeing;	We are of the view that the general wording of the current adopted policy, and the specific criteria provided ensures that the Council retains control over any potential future planning applications for all proposals involving restaurants, hot food takeaways, cafes, snack bars, public houses and any other uses involving the sale of food and drink within defined centres.

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	e. parking and servicing provision associated with the proposed development and its effects in terms of road safety, traffic generation and movement; f. provision for the storage and disposal of refuse and customer litter; and g. the environmental impact of any ventilation flues and/or ducting.	

Appendix 1 – Healthchecks and Composition Plans