
# Powys Retail Needs Assessment

## February 2024

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# 1. Introduction

1.1. This report has been prepared by Reeves Retail Planning Consultancy (RRPC) on the instructions of Powys County Council (PCC), with input from Owen Davies Consulting (ODC). Its purpose is twofold:

- Firstly, it provides an updated assessment of the capacity for retail development in the County during the period to 2037 to inform the Powys Replacement Local Development Plan 2022 – 2037 (RLDP) which the Council are in the process of preparing; and
- Secondly it provides advice to PCC on whether the existing retail and town centre related policies in the Powys Adopted Local Development Plan (2011 – 2026) (LDP) need to be revised.

1.2. Once adopted the RLDP will replace the Powys Adopted LDP 2011 – 2026.

## Background

1.3. National planning policy is set out in Planning Policy Wales (PPW) and plans at all levels of the development plan hierarchy must be prepared in accordance with it (PPW, para 1.22). This means that the RLDP must reflect and deliver the national objectives for town centres which are to:

- Promote viable urban and rural retail and commercial centres, as the most sustainable locations to live, work, shop, socialise and conduct business;
- Sustain and enhance retail and commercial centres' vibrancy, viability, and attractiveness; and
- Improve access to, and within retail and commercial centres, by all modes of transport, prioritising walking, cycling and public transport (PPW, para 4.3.3).

1.4. To achieve this, a development plan needs to establish a clear strategy for retail development, which in turn requires an understanding of the current provision in the plan area, how it is used and how things may change in the future.

1.5. As part of the collection of evidence to inform the RLDP (the evidence base), a 'Review of retail and town centre hierarchy, health and boundaries' has already been undertaken by Owen Davies Consulting and Chilmark Consulting (hereafter referred to as RTCHHB). The purpose of this study is to provide additional information on changing retail and town centre trends, advise on how this may affect Powys town centres and quantify the future retail needs in the Plan Area.

1.6. The findings of both studies have then been used to inform the advice (as prepared by RRPC and ODC) on the Adopted LDP retail and town centre policies and how they may need to be updated for the Powys RLDP as a consequence of the updated evidence.

## Report Structure

1.7. The report is intended to be read in conjunction with the RTCHHB report and is structured as follows:

- **Section 2** considers the Planning Policy Framework;
- **Section 3** examines retail and town centre trends at a national level and considers the implications for the town centres in Powys;

- **Section 4** sets out the findings and conclusions from the quantitative retail need assessment for Powys, with the detailed assessment provided in Appendix 1. It also considers the qualitative need for changing retail provision in the centres in the light of the findings from the RTCHHB; and
- **Section 5** provides advice on the need to update the Adopted LDP planning policies.

1.8. In all cases the detailed supporting material is appended to this report as indicated.

# 2. Planning Policy Framework

## Planning Policy Wales

2.1. National planning policy is set out in Planning Policy Wales (PPW), the most recent version of which was published in February 2024 (Edition 12).

2.2. To support the Government's primary objective of ensuring that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, PPW identifies a number of overarching objectives for retail and commercial centres. These centres are recognised as hubs of social and economic activity and the focal point for the diverse range of services which support the needs of local communities. They are highly accessible by different modes of transport and are therefore the most sustainable locations for new development.

2.3. The national objectives for town centres are to:

- Promote viable urban and rural retail and commercial centres, as the most sustainable locations to live, work, shop, socialise and conduct business;
- Sustain and enhance retail and commercial centres' vibrancy, viability and attractiveness; and
- Improve access to, and within retail and commercial centres, by all modes of transport, prioritising walking, cycling and public transport (para 4.3.3).

2.4. These objectives are to be delivered by local planning authorities through their development plans and national policy requires that:

- Retail and commercial centres should be identified in development plans (para 4.3.2);
- Development plans should provide a clear strategy for retail development, to include policies that will achieve vibrant, attractive and viable retail and commercial centres (para 4.3.4). These should be based on an understanding of the changing retail pressures and opportunities affecting the centres and appropriate responses to them should be included in their retail strategies. In some situations, this may mean taking pro-active steps to identify retail and commercial centre locations for expansion, whilst other centres may require reinvigoration or a managed change in the relative importance of a centre as other centres' roles expand (para 4.3.6);
- A hierarchy of retail and commercial centres should be established and boundaries for the centres should be shown on the Proposals Map (para 4.3.10). Centres should be categorised by their function, size, scale, form and location and a framework for their future roles should be set out (paras 4.3.11 & 4.3.12);
- Policies should encourage a diversity of uses in a centre, recognising that this contributes to vibrancy and viability. Diversity can also reduce vacancy levels (para 4.3.36);
- Policies should identify which retail and commercial centres have primary and secondary shopping areas. These should be defined on the Proposals Map and the plan should include policies describing the types of uses that are likely to be acceptable in these areas;

- Mixed use developments should be encouraged where appropriate (para 4.3.34);
- The health of centres should be monitored, and changes made to the policies or boundaries if the right balance of use and activity is not being achieved (paras 4.3.35 – 4.3.36);
- The development plan process should include an assessment of the need for additional retail development. This should include a consideration of quantitative and qualitative need (para 4.3.13);
- Precedence should be given to establishing quantitative need before qualitative need is considered for both convenience and comparison floorspace (para 4.3.15);
- Qualitative need may be an important consideration in certain circumstances where it supports the objectives of the local development plan or national planning policy. However, it is for the planning authority to determine and justify the weight given to any qualitative assessment (paras 4.3.15 – 4.3.17);
- If a need is identified, the most appropriate form, scale, and location for provision should be considered (para 4.3.8), in accordance with the 'town centre first' policy (para 4.3.18);
- The strategy and policies of the development plan should set out a framework for the authority's retail and commercial centres, taking into account the strategies of adjoining authorities to support a successful retailing sector (para 4.3.4);
- Development plans should include criteria based policies against which retail proposals can be assessed, even if there is no identified need (para 4.3.9);
- Development plans should also include policies to protect existing retail sites from inappropriate development, unless there is evidence that an existing retail site is no longer required (para 4.3.24); and
- Policies and supplementary planning guidance should support the management of retail and commercial centres (para 4.3.39).

2.5. PPW is also explicit as to the types of other uses considered to be complementary to retail and therefore appropriate in retail and commercial centres. These include:

- Financial and professional services (A2);
- Food and drink (A3);
- Offices (B1);
- Hotels (C1);
- Educational and other non-residential establishments (D1);
- Leisure (D2); and
- Other uses such as launderettes and theatres (para 4.3.21).

2.6. The contribution of a vibrant and viable evening and night-time economy is also recognised, although the compatibility of the offer with nearby residential uses should be considered (para 4.3.43). Similarly, creative and cultural business clusters can be important catalysts for regeneration (para 4.3.46).

## Technical Advice Note 4: Retail and Commercial Development

2.7. PPW is supported by a series of Technical Advice Notes (TAN) including Technical Advice Note 4: Retail and Commercial Development (TAN4) which provides further guidance on retail and town centre policy, both in relation to policy making and development management.

2.8. It sets out a requirement for local planning authorities to plan positively to protect and enhance the vibrancy, viability and attractiveness of their retail and commercial centres and to develop their retail evidence base. It also provides additional guidance on:

- How to define retail and commercial centre hierarchies, including the need to consider the future status of a centre;
- The types of policies that may be appropriate in relation to changes of use and the degree of flexibility a local planning authority wishes to see;
- The development of a clear strategy for retail and commercial centres during the plan period;
- The factors that should be considered in deciding how any identified retail need should be met, or how decline should be managed to ensure that communities retain access to the goods and services they require;
- The benefits of developing the night-time economy in relevant centres;
- How quantitative retail need should be assessed, noting that the outcome can be sensitive to small changes in the assumptions. No particular methodology is prescribed, but assessments should be prepared in a clear logical and transparent way using robust and realistic evidence;
- The appropriate times to consider qualitative need and when retail development may be justified on this basis;
- The 'town centre first' approach to development and how the sequential test should be applied both in relation to development plan site allocations and planning applications for retail or other town centre uses;
- The need to consider the impact any new site allocations may have on existing retail and commercial centres;
- The use of designated Primary and Secondary Areas to promote and maintain an effective distribution and balance of uses within a centre, noting that the level of flexibility applied is likely to reflect the centre's retail performance and demand for space; and
- The need to undertake regular assessments or 'health checks' of centres as a means of monitoring change over time, using a range of indicators to measure vitality, attractiveness and viability. A number of specific measures are referenced but TAN4 recognises that locally specific indicators may also be relevant.

## Other National Policy Guidance

2.9. Details of other national policy and guidance relevant to town centres is provided in Section 4 of the RTCHHB. This includes details of **Future Wales – The National Plan 2040** (February 2021), which is the national development framework and sets out the direction for development in Wales to 2040. It is the highest tier of development plan and includes policies on issues which the Welsh Government considers to be a national priority or are matters which are distinctly spatial and require national leadership. In relation to retail and town centre matters, Future Wales is clear that existing cities and large towns will be the main focus for development and identifies Growth Areas, including two Regional Growth Areas within the RLDP area:

- The Heart of Wales, including Llandrindod Wells and Builth Wells; and
- Bro Hafren, including Welshpool and Newtown.

2.10. Future Wales also sets out a 'Town Centre First' approach to development (Policy 6) which extends the well-established approach for retail development to a wider range of land uses including significant new commercial, education, health, leisure and public service facilities as well. This recognises the changing nature of town centres, which are moving away from their traditional retail roles. Health and vibrancy, however, can be maintained by widening the uses accommodated in centres, which also benefit from good access by public transport to and from the whole town or city and, where appropriate, the wider region.

2.11. A sequential approach must be used to inform the identification of the best location for these developments, with the aim of making town centres multifunctional places and the focus of growth and regeneration. Intensification and diversification in and around town centres is also supported.

2.12. '**Building Better Places**' published in July 2020 is also relevant as it seeks to consider the relevant place-making responses to the Covid-19 pandemic. It sets out the Welsh Government's planning policy priorities in the recovery period. This includes 'revitalising our town centres' as one of eight key issues to be addressed.

2.13. The Welsh Government recognises that the retail sector was already struggling before the pandemic and notes that the planning system must respond to this situation by ensuring that retail and commercial centres can operate as flexibly as possible.

2.14. This requires:

- A clear vision for each centre in LDPs;
- An assessment of the role and function of the established shopping areas; and
- Realistic and sensible boundaries for centres, with the identification of sites for redevelopment. In particular, Primary Retail Areas need to be reviewed and there should not be an expectation that retail occupiers will return in the numbers witnessed prior to the pandemic.

2.15. The document also proposes that town centre assessments should replace retail assessments for Development Plans. These assessments should consider the wider array of use requirements, based upon the evidence and vision for the centre in line with the Town Centre First Principle.

2.16. Building Better Places also notes the importance of:

- Considering the opportunities to use outside spaces within town centres;

- Making centres places where a variety of retail, employment, commercial, community, leisure, health and public sector uses come together in a hub of activity to make them viable as go-to destinations once more;
- Considering the introduction of flexible, local co-working spaces;
- Introducing/expanding residential uses to improve the vitality of centres, provided that they do not curtail the commercial activities which take place and soundscapes are considered; and
- Challenging unreasonable and inflexible policies as creative thinking will be needed to reimagine and re-purpose these areas.

## The Powys Adopted Local Development Plan (2011 – 2026)

2.17. The Local Development Plan (LDP) for Powys was adopted in April 2018 and the key retail policies are as follows:

- **Strategic Policy SP4 – Retail Growth** which makes provision for up to 1,000 sqm net of retail floorspace over the Plan period 2011 – 2026. Of this 800 sqm would be for convenience goods sales and 200 sqm for comparison sales. Land for local retail floorspace is allocated in Policy R2, with any additional need to be accommodated in existing vacant premises.
- **Policy R1 – New Retail Development** which sets out the retail hierarchy for the plan area and requires proposals for new retail development within the centres listed to be of a scale and design appropriate to the settlement and in accordance with the retail hierarchy. Proposals which undermine the retail hierarchy will not be permitted.

| | |
|---|---|
| **Area Retail Centres:** | **Llandrindod Wells, Llanidloes, Machynlleth, Newtown and Welshpool.** |
| **District Retail Centres:** | **Builth Wells, Knighton, Presteigne, Rhayader and Ystradgynlais.** |
| **Local Retail Centres:** | **Llanfair Caereinion, Llanfyllin, Llanwrtyd Wells and Montgomery.** |

- **Policy R2 – Retail Allocations** which allocates the former Kaye Foundry site in Presteigne for 1,000 sqm net of new retail floorspace (Site Allocation P51 MUA1).
- **Policy R3 – Development within Town Centre Areas** which supports development within Town Centre Areas where (i) it enhances the vitality and viability of the existing town centre and accords with Policy R1; and (ii) it does not propose a residential (C3) use on a ground floor in a Primary Frontage; and (iii) it would not result in less than 75% of units within the Primary Frontage, or less than 66% of units within the Secondary Frontage being used for A1 and A3 uses, unless it has been demonstrated that the unit has been vacant for a prolonged period and has been actively marketed for at least six months or the proposal is for a community use of wider public benefit and in need of a town centre location.
- **Policy R4 – Neighbourhood and Village Shops and Services** which supports the establishment of new neighbourhood and village shops where (i) they are located in a Town,

Large Village or Small Village; (ii) serve the needs of the local area and (iii) do not undermine the retail hierarchy or have an unacceptable adverse impact on the vitality and viability of the Retail Centres and accord with Policy R1.

- **Appendix 7** provides maps of Primary and Secondary Frontages within Town Centres

## Planning Policy Conclusions

2.18. National planning policy recognises the importance of town centres in economic, social and sustainability terms and seeks to sustain and enhance their vibrancy, viability and attractiveness as retail and commercial centres.

2.19. PPW sets out a number of objectives for town centres that are to be delivered by local planning authorities through their development plans and these requirements are reflected in the retail and town centre policies of the current Powys Adopted LDP.

2.20. Further, the RTCHHB already provides much of the updated evidence base on retail and town centre uses required by national policy:

- It identifies the retail and commercial centres in Powys (para 4.3.2) and sets out a hierarchy for the centres (para 4.3.10) considering their function, size, scale, form and location (paras 4.3.11 & 4.3.12); and
- It examines the current mix of uses in the centres, changes over time and the health of each centre. Changes to town centre boundaries are then proposed to ensure this is maintained in the future (paras 4.3.35 – 4.3.36).

2.21. However, the RTCHHB study does not provide a quantitative assessment of the need for additional retail development, nor is qualitative need explicitly considered (paras 4.3.13 & 4.3.15 – 4.3.17). As a result, it also does not review existing primary and secondary retail frontages, nor is it able to provide advice on:

- The most appropriate form, scale, and location for new provision should it be required (para 4.3.8);
- The need to revise and update the current strategy and policies of the development plan (para 4.3.4);
- The need for policies to protect existing retail sites from inappropriate development, unless there is evidence that an existing retail site is no longer required (para 4.3.24); or
- Advice and guidance on the management of retail and commercial centres (para 4.3.39).

2.22. The purpose of this report is to address these gaps in the evidence base by undertaking a quantitative need assessment for both convenience and comparison floorspace and to use this information, together with that in the RTCHHB, to also provide advice on whether there is any qualitative needs in the County.

2.23. The evidence from both studies has then been reviewed by RRPC and Owen Davies Consulting to inform the advice provided in Section 5 of this report on the appropriateness of the retail and town centre strategy in Powys and provides recommendations on possible revisions and additions to the Powys Adopted LDP policies outlined above.

# 3. Retail and Town Centre Trends

3.1. Town centres have generally developed organically over time in response to the evolving needs of their catchment area, and always been dynamic multi-functional places. In recent decades the increasing demand for shops has seen town centres expand their retail offer with the result that many often interpret 'town centre' as meaning 'shopping'.

3.2. However, this is rarely, if ever, the case in practice and it important to recognise that the most successful, vibrant and viable centres are those that offer a wide range of goods and services to both the resident population and visitors to the area.

3.3. This is not to say the retail offer in a town centre is not important, as it remains a major occupier of space and generator of regular footfall, rather, as retailing changes, the importance of other town centre uses is growing in both real and relative terms.

3.4. This means that any quantitative assessment of the need for additional retail provision is just one factor that needs to be considered when seeking to develop the strategies to support healthy and attractive town centres in the plan area. Other considerations include the other uses found in the centres which determines the overall role of those centres, and an understanding of how national and local trends have and will continue to affect the needs of the local communities the centres serve.

3.5. Some of these trends have already been considered in the RTCHHB (Section 5) and this report does not seek to repeat the findings here. However, any assessment of quantitative need will depend on the available expenditure in an area, and how that is forecast to change. At the time of writing (February 2024) this will reflect the cost of living crisis and concerns regarding inflation, but also global events, which impact on the world economy and supply chain.

3.6. These factors together influence what money is likely to be available to support town centres in the future and the forecasts used in this need assessment are based on those provided by Experian Business Strategies (Experian) in their most recent Retail Planner Briefing Note No. 20 (ERPBN 20), published in February 2023.

## Convenience Spend

3.7. Convenience expenditure refers to the money spent on food, non-alcoholic drinks, alcohol, tobacco, newspapers and 90% of non-durable household goods, including items such as cleaning materials, and kitchen disposables[1]. They are generally low-cost items, purchased frequently and usually relatively locally, with the main outlets being the supermarkets operated by the national multiples such as Tesco, the discounters Aldi and Lidl and the smaller shop operators such as the Co-op and Spar. The category also includes spend in independent retailers and specialist food and drink outlets.

3.8. As consumers have become more affluent, with more disposable income, the trend has been for spending on convenience goods to remain relatively static, with the proportion of total spend

[1] ERPBN 20, page 18

reducing in real terms (i.e. excluding the effects of inflation). This is not expected to change in the foreseeable future.

3.9. The effect of these changes in terms of UK spend per head can be seen in the Experian estimates and forecasts of the changes in retail spend during the period from 2012 to 2040[2]. The changes from 2016 to 2037 (the end of the new plan period) are set out in Table 3.1 and the effect of the changes on an indexed basis is also provided.

**Table 3.1: Change in Convenience Spend per Head - UK**

| Year | Expected Change in Spend per head | | |
|---|---|---|---|
| | Forecast change in Annnual Spend per head (%) | Index from 2016 Base Year | Index from 2022 Base Year |
| 2016 | | **100.0** | |
| 2017 | 1.6% | 101.6 | |
| 2018 | 0.1% | 101.7 | |
| 2019 | 0.2% | 101.9 | |
| 2020 | 10.2% | 112.3 | |
| 2021 | -1.4% | 110.7 | |
| 2022 | -6.7% | 103.3 | **100** |
| 2023 | -2.4% | 100.8 | 97.6 |
| 2024 | -0.4% | 100.4 | 97.2 |
| 2025 | 0.1% | 100.5 | 97.3 |
| 2026 | 0.1% | 100.6 | 97.4 |
| 2027 | 0.1% | 100.7 | 97.5 |
| 2028 | 0.1% | 100.8 | 97.6 |
| 2029 | 0.1% | 100.9 | 97.7 |
| 2030 | 0.2% | 101.1 | 97.9 |
| 2031 | 0.2% | 101.3 | 98.1 |
| 2032 | 0.2% | 101.5 | 98.3 |
| 2033 | 0.2% | 101.7 | 98.5 |
| 2034 | 0.2% | 101.9 | 98.7 |
| 2035 | 0.2% | 102.1 | 98.9 |
| 2036 | 0.2% | 102.4 | 99.1 |
| 2037 | 0.2% | 102.6 | 99.3 |

Source: Figures 1a & 1b, Experian Retail Planner Briefing Note 20

3.10. Table 3.1 clearly shows the limited change in convenience spend expected over the whole of the plan period, with available convenience spend per head being only 2.6% higher in 2037 than it was in 2016 (excluding inflation). The change from 2022 is one of a very small decline.

3.11. However, these figures do not make any allowance for the growth in online sales seen over this period. Although many such purchases are fulfilled by stores (with staff picking the items from the

[2] Experian Retail Planner Briefing Note 20, Figures 1a and 1b

store shelves rather than the customer), some sales are sourced from warehouses. The former still requires physical store floorspace to be provided, but the latter does not.

3.12. Experian therefore provides estimates for the changes in UK expenditure per head for convenience goods, with deductions to allow for online sales adjusted to reflect the expected proportion which will be sourced from stores[3]. These adjusted figures are provided in Table 3.2 and show that the limited growth in convenience expenditure per head seen in Table 3.1 will be more than offset by the rise in online sales.

**Table 3.2: Change in Convenience Spend per Head - UK Adjusted for internet trading**

| Year | Expected Change in Spend per head | | | Adjusted for internet trading via stores | | |
|---|---|---|---|---|---|---|
| | Forecast change in Annnual Spend per head (%) | Index from 2016 Base Year | Index from 2022 Base Year | Forecast change in Annnual Spend per head (%) | Index from 2016 Base Year | Index from 2022 Base Year |
| 2016 | | **100.0** | | | **100.0** | |
| 2017 | 1.6% | 101.6 | | 1.2% | 101.2 | |
| 2018 | 0.1% | 101.7 | | -0.2% | 101.0 | |
| 2019 | 0.2% | 101.9 | | -0.4% | 100.6 | |
| 2020 | 10.2% | 112.3 | | 8.9% | 109.5 | |
| 2021 | -1.4% | 110.7 | | -2.3% | 107.0 | |
| 2022 | -6.7% | 103.3 | **100** | -6.8% | 99.7 | **100** |
| 2023 | -2.4% | 100.8 | 97.6 | -2.2% | 97.6 | 97.8 |
| 2024 | -0.4% | 100.4 | 97.2 | -0.7% | 96.9 | 97.1 |
| 2025 | 0.1% | 100.5 | 97.3 | -0.3% | 96.6 | 96.8 |
| 2026 | 0.1% | 100.6 | 97.4 | -0.2% | 96.4 | 96.6 |
| 2027 | 0.1% | 100.7 | 97.5 | -0.1% | 96.3 | 96.5 |
| 2028 | 0.1% | 100.8 | 97.6 | 0.1% | 96.4 | 96.6 |
| 2029 | 0.1% | 100.9 | 97.7 | 0.0% | 96.4 | 96.6 |
| 2030 | 0.2% | 101.1 | 97.9 | 0.0% | 96.4 | 96.6 |
| 2031 | 0.2% | 101.3 | 98.1 | 0.0% | 96.4 | 96.6 |
| 2032 | 0.2% | 101.5 | 98.3 | 0.0% | 96.4 | 96.6 |
| 2033 | 0.2% | 101.7 | 98.5 | 0.0% | 96.4 | 96.6 |
| 2034 | 0.2% | 101.9 | 98.7 | 0.1% | 96.5 | 96.7 |
| 2035 | 0.2% | 102.1 | 98.9 | 0.1% | 96.6 | 96.8 |
| 2036 | 0.2% | 102.4 | 99.1 | 0.1% | 96.7 | 96.9 |
| 2037 | 0.2% | 102.6 | 99.3 | 0.1% | 96.8 | 97.0 |

Source: Figures 1a & 1b and Figure 7, Experian Retail Planner Briefing Note 20

3.13. As such, unless there is a significant change in population in the Powys plan area, it would not be expected that there would be any quantitative need for additional convenience floorspace during the plan period.

## Comparison Spend

3.14. Comparison expenditure refers to the money spent on all other retail goods and with the relative importance of key types of spend in the UK set out in Table 3.3.

[3] Experian Retail Planner Briefing Note 20, Figure 7

**Table 3.3: Comparison Expenditure by Spend Category (£ per annum) - UK**

| Total Comparison per Person (Total) | UK Average Spend (£) | UK Average Spend (%) |
|---|---|---|
| | **£3,803** | |
| Clothing materials and garments per Person | £787 | 20.7% |
| Furniture and furnishings; carpets and other floor coverings per Person | £431 | 11.3% |
| Games, toys and hobbies; sport and camping; musical instruments per Person | £359 | 9.4% |
| Appliances for personal care per Person | £327 | 8.6% |
| Audio-visual, photographic and information processing equipment per Person | £321 | 8.4% |
| Jewellery, clocks and watches per Person | £167 | 4.4% |
| Major household appliances (electric or not) per Person | £147 | 3.9% |
| Books and stationery per Person | £146 | 3.8% |
| Pets and related products per Person | £142 | 3.7% |
| Shoes and other footwear per Person | £141 | 3.7% |
| Medical goods and other pharmaceutical products per Person | £138 | 3.6% |
| Household textiles per Person | £117 | 3.1% |
| Gardens, plants and flowers per Person | £111 | 2.9% |
| Glassware, tableware and household utensils per Person | £101 | 2.7% |
| Small tools and miscellaneous accessories per Person | £92 | 2.4% |
| Recording media per Person | £62 | 1.6% |
| Therapeutic appliances and equipment per Person | £54 | 1.4% |
| Other personal effects per Person | £47 | 1.2% |
| Small electrical household appliances per Person | £29 | 0.8% |
| Bicycles per Person | £29 | 0.8% |
| Materials for maintenance and repair of the dwelling per Person | £29 | 0.8% |
| Major tools and equipment per Person | £18 | 0.5% |
| 10% of Non-Durable household goods per Person | £11 | 0.3% |
| Total | £3,803 | 100.0% |

*Source: Experian Area Comparison Report for Powys - UK figures*

3.15. This shows the relative importance of sales for different types of comparison goods, with clothing and garment sales representing the main spend area and accounting for around a fifth of all comparison spend. The top five expenditure categories combined account for over 58% of spend.

3.16. The presence or absence of retail outlets selling these types of goods in an area, will therefore be a major determinant in the amount of comparison expenditure spent in a particular area and how much is lost to stores elsewhere. It is also the case that these expenditure figures make no allowance for online or other non-store-based purchases and some categories of spend will be more likely to be made online than others.

3.17. In terms of changes to expenditure per head on comparison goods, the trend has generally been one of growth as consumers have become more affluent and have more disposable income. However, much of this is discretionary spend and it can be more influenced by economic variables and confidence in the short term than is seen with convenience spend. Comparison goods are also more likely to be purchased online and to be sourced from non-shop locations.

3.18. The effect of these influences can be seen in the Experian estimates and forecasts for UK comparison spend per head in the period 2016 to 2040 set out in Table 3.4[4], together with the figures indexed to 2016 and 0222. The table also includes the annual forecast change in comparison spend adjusted for internet sales not serviced from a store.

**Table 3.4: Change in Comparison Spend per Head - UK Inclusing and Excluding Internet Sales**

| Year | Expected Change in Spend per head | | | Adjusted for internet trading via stores | | |
|---|---|---|---|---|---|---|
| | Forecast change in Annnual Spend per head (%) | Index from 2016 Base Year | Index from 2022 Base Year | Forecast change in Annnual Spend per head (%) | Index from 2016 Base Year | Index from 2022 Base Year |
| 2016 | | **100.0** | | | **100.0** | |
| 2017 | 3.9% | 103.9 | | 1.8% | 101.8 | |
| 2018 | 0.7% | 104.6 | | -1.0% | 100.8 | |
| 2019 | 2.5% | 107.2 | | -0.3% | 100.5 | |
| 2020 | -6.8% | 100.0 | | -18.1% | 82.3 | |
| 2021 | 6.7% | 106.6 | | 6.0% | 87.2 | |
| 2022 | -0.4% | 106.2 | **100** | 2.0% | 89.0 | **100** |
| 2023 | -1.6% | 104.5 | 98.4 | -1.0% | 88.1 | 99.0 |
| 2024 | 0.3% | 104.8 | 98.7 | -0.8% | 87.4 | 98.2 |
| 2025 | 2.5% | 107.5 | 101.2 | 0.3% | 87.6 | 98.5 |
| 2026 | 2.5% | 110.1 | 103.7 | 1.6% | 89.0 | 100.1 |
| 2027 | 2.5% | 112.9 | 106.3 | 2.2% | 91.0 | 102.3 |
| 2028 | 2.5% | 115.7 | 108.9 | 2.4% | 93.2 | 104.7 |
| 2029 | 2.5% | 118.6 | 111.7 | 2.5% | 95.5 | 107.4 |
| 2030 | 3.0% | 122.2 | 115.0 | 2.6% | 98.0 | 110.1 |
| 2031 | 3.0% | 125.8 | 118.5 | 2.6% | 100.5 | 113.0 |
| 2032 | 3.0% | 129.6 | 122.0 | 2.7% | 103.3 | 116.1 |
| 2033 | 3.0% | 133.5 | 125.7 | 2.7% | 106.1 | 119.2 |
| 2034 | 3.0% | 137.5 | 129.4 | 2.7% | 108.9 | 122.4 |
| 2035 | 3.0% | 141.6 | 133.3 | 2.8% | 112.0 | 125.8 |
| 2036 | 3.0% | 145.9 | 137.3 | 2.8% | 115.1 | 129.4 |
| 2037 | 3.0% | 150.3 | 141.5 | 2.8% | 118.3 | 133.0 |

Source: Figures 1a & 1b and Figure 7, Experian Retail Planner Briefing Note 20

3.19. Table 3.4 shows both how online sales are impacting on retail store performance and the effect of the various economic pressures being faced by consumers. In real terms comparison spend is only expected to increase slightly during the first part of the 2020's, with spend per head in 2024 being less than 5% higher than in 2016. The projections indicate that it will be 2025 before the UK comparison spend per head in 2022 is again reached.

3.20. When the proportion of spend being made online is removed, the challenges facing the retail sector become very clear, with store-based trade not expected to return to 2016 levels until 2031. Similarly, it will take to 2026 to even reach the 2022 levels, which themselves had been impacted by the effects of the Covid-19 pandemic.

[4] Experian Retail Planner Briefing Note 20, Figures 1a, 1b and 7

3.21. With forecasts for dates more than five years ahead, likely to be the subject of change and potentially considerable change where forecasts relate to periods 10 years or more ahead, this suggests that there will not be significantly greater spend to support new retail floorspace until towards the end of the RLDP plan period, unless there is a significant change in population.

## Leisure Uses

3.22. The importance of leisure uses in town centres has increased in recent years, as food and beverage (F&B) uses, and other leisure activities have become more popular and provided alternative occupiers for vacant retail space.

3.23. Experian estimate that in 2021 the average person in the UK spent £3,438 per annum on 'leisure' activities, although this includes a number of items not relevant to town centres, such as spend on education, insurance and social protection[5]. Accommodation spend is also not likely to be relevant given residents of Powys would be expected to spend this in other locations rather than at home.

3.24. The resulting leisure spend of interest to town centres, however, remains significant as set out in Table 3.5 which shows average UK spend per head for 2021[6].

[5] Child care, home help, nursery, crèche, playschools and residential home costs

[6] Data reflects restrictions due to Covid-19. By way of comparison cinema spend per head was 80p in 2020 and £1.90 in 2022 (ONS data)

**Table 3.5: UK Leisure Expenditure per Head 2021 by Spend Category (selected) (£ per annum)**

| | UK Average Spend per Head per annum (£) * |
|---|---|
| **Restaurants, cafes etc** | |
| Alcoholic drinks (away from home) | £274 |
| Contract catering (food) | £18 |
| Other take-away and snack food | £198 |
| Restaurant and café meals | £672 |
| Take away meals eaten at home | £250 |
| Total Restaurant & cafes etc | £1,412 |
| **Cultural Services** | |
| Cinemas* | £0 |
| Live entertainment: theatre, concerts, shows | £54 |
| Museums, zoological gardens, theme parks, houses and gardens | £39 |
| Admissions to clubs, dances, discos, bingo per Person | £8 |
| Subscriptions for leisure activities and other subscriptions per Person | £38 |
| Total Cultural Services | £139 |
| **Games of chance** | |
| Bingo stakes excluding admission | £0 |
| Bookmaker, tote, other betting stakes | £20 |
| Football pools stakes | £0 |
| Lottery | £181 |
| Total Games of Chance | £201 |
| **Hairdressing & Personal Grooming** | |
| Hairdressing & Personal Grooming | £82 |
| Total Personal Grooming | £82 |
| **Recreational and sporting services** | |
| Hire of equipment for sport and open air recreation | £0 |
| Leisure class fees | £75 |
| Participant sports (excluding subscriptions) | £28 |
| Spectator sports: admission charges | £5 |
| Subscriptions to sports and social clubs | £58 |
| Total Recreational and Sporting Services | £166 |
| **Total Selected Leisure Spend per Head** | **£2,000** |

*Source: Experian Area Comparison Report for Powys - UK figures*

** Spend on some leisure categories is recorded as £0 or very low, reflecting restrictions imposed due to Covid-19.*

3.25. Table 3.5 shows the importance of dining out, the consumption of alcoholic beverages at pubs and bars (as well as restaurants), the purchase of takeaway meals for eating at home and other takeaway and snack food in the UK. Other significant spend that may be relevant to town centres includes hairdressing and personal grooming.

3.26. In terms of how spend is expected to change over time, the forecasts provided by Experian relate to all uses classified as leisure and some variation between types of uses can be expected. However, overall, the RLDP plan period to 2037 will see a small amount of growth in leisure spend per head, after the variation of recent years.

**Table 3.6: Change in Leisure Spend per Head - UK**

| Year | Expected Change in Spend per head | | |
|---|---|---|---|
| | Forecast change in Annnual Spend per head (%) | Index from 2016 Base Year | Index from 2022 Base Year |
| 2016 | | **100.0** | |
| 2017 | 0.8% | 100.8 | |
| 2018 | -0.4% | 100.4 | |
| 2019 | -0.1% | 100.3 | |
| 2020 | -37.9% | 62.3 | |
| 2021 | 30.5% | 81.3 | |
| 2022 | 27.7% | 103.8 | **100** |
| 2023 | -5.0% | 98.6 | 95.0 |
| 2024 | -0.2% | 98.4 | 94.8 |
| 2025 | 1.0% | 99.4 | 95.8 |
| 2026 | 1.0% | 100.4 | 96.7 |
| 2027 | 1.0% | 101.4 | 97.7 |
| 2028 | 1.0% | 102.4 | 98.7 |
| 2029 | 1.0% | 103.4 | 99.6 |
| 2030 | 0.9% | 104.4 | 100.5 |
| 2031 | 0.9% | 105.3 | 101.4 |
| 2032 | 0.9% | 106.2 | 102.4 |
| 2033 | 0.9% | 107.2 | 103.3 |
| 2034 | 0.9% | 108.2 | 104.2 |
| 2035 | 0.9% | 109.1 | 105.1 |
| 2036 | 0.9% | 110.1 | 106.1 |
| 2037 | 0.9% | 111.1 | 107.1 |

Source: Figures 1a & 1b, Experian Retail Planner Briefing Note 20

## Conclusions

3.27. Town centres and our traditional high streets have always been dynamic, adapting and evolving to meet the emerging needs of their customer base but the significant and fast-moving structural changes seen since the economic recession have resulted in a significant decline in the demand for retail floorspace and centres have often not been able to adapt quickly enough resulting in increased vacancies and under-utilised retail space.

3.28. These on-going changes have been compounded by the unexpected impacts arising from the Covid-19 pandemic and the recent economic challenges being experienced as a result of Brexit and the war in Ukraine, which have led to supply chain issues, the cost-of-living crisis and inflation. There has also been an impact on the labour force with many town centre type businesses finding it difficult to recruit sufficient staff.

3.29. Looking forward, the recent periods of economic uncertainty and reduced consumer spend are likely to be replaced with a more normal pattern of expenditure growth, albeit at a lower rate of increase than was seen in the mid 2010's. However, once the effect of increasing online sales is allowed for, the increase in spend in physical shops will be more limited, with convenience spend actually declining in real terms and comparison sales not increasing beyond the 2022 levels until after 2031.

3.30. This means that, unless there are other changes being seen in an area, such as significant population increase, it is unlikely that there will be any capacity for further retail development in the short to medium term. Longer term there may be some requirements for a small amount of additional comparison floorspace, but this is unlikely to be sufficient to generate a requirement for new sites to be allocated, instead offering the potential for vacant floorspace to be brought back into retail use.

3.31. There may be some demand for additional floorspace for leisure uses, with F&B expected to remain a major element of a town centre's offer. However, again this offers the opportunity for vacant or under-utilised space to be repurposed, rather than requiring major new development.

# 4. Retail Capacity – Quantitative Assessment and Qualitative Need

4.1. Although the expenditure trends outlined above indicate that generally there is unlikely to be any sizeable quantitative need for retail development during the proposed plan period to 2037, it remains necessary to also consider local circumstances in Powys.

4.2. PPW is explicit that when assessing retail needs for the purposes of considering whether there is a requirement to allocate sites for development, precedence should be given to establishing quantitative needs, with convenience and comparison floorspace assessed separately. However, qualitative need can also be a consideration and together this will inform a local planning authority whether there is a need to allocate sites for future retail development.

4.3. Specifically, PPW requires:

- A consideration of quantitative and qualitative need (para 4.3.13) with precedence given to establishing quantitative need before qualitative need is considered for both convenience and comparison floorspace (para 4.3.15);
- Qualitative need may be an important consideration in certain circumstances where it supports the objectives of the local development plan or national planning policy. However, it is for the planning authority to determine and justify the weight given to any qualitative assessment (paras 4.3.15 – 4.3.17); and
- If a need is identified, the most appropriate form, scale, and location for provision should be considered (para 4.3.8), in accordance with the 'town centre first' policy (para 4.3.18).

4.4. The Welsh Government does not prescribe any particular methodology for undertaking needs assessments but paragraph 6.3 of TAN4 indicates that they usually include:

- Existing and forecasted population levels and distribution;
- Forecast expenditure for specific classes of goods to be sold, within the broad categories of comparison and convenience goods;
- Sales density data for both existing and future retail provision which is realistic and benchmarked against similar retail developments in the area; and
- Catchment areas for centres.

## Convenience and Comparison Capacity for Retail Floorspace

4.5. In order to satisfy the policy requirements set out in PPW, there is a need to undertake a quantitative assessment of the retail capacity for Powys, to update that previously undertaken by Nathaniel Lichfield and Partners (NLP) in 2015 (Powys Retail Study Addendum 2015).

4.6. The methodology adopted is set out below, with a map of the study area and all the tables replicated in Appendix 1.

### Study Area

4.7. The starting point for any area-based analysis, is to identify an appropriate study area. In this case this is the whole of the Powys County, although it is recognised that Powys County Council is not responsible for planning policy in the area covered by the Brecon Beacons National Park Authority.

4.8. The study area has then been divided into 13 smaller zones, based on Middle Super Output Areas (MSOAs) grouped into localities as follows:

**Table 4.1: Study Area Zones- County of Powys (including areas within Brecon Beacons National Park (BBNP)**

| Zone | Locality Name | Middle Super Output Area Name | Middle Super Output Area | Comments |
|---|---|---|---|---|
| 1 | Llanfyllin | Powys 001 | W02000097 | |
| 2 | Machynlleth | Powys 004 | W02000100 | |
| 3 | Llanfair Caereinion | Powys 006 | W02000102 | |
| 4 | Welshpool and Montgomery | Powys 002 | W02000098 | |
| | | Powys 003 | W02000099 | |
| | | Powys 005 | W02000101 | |
| 5 | Llanidloes | Powys 010 | W02000106 | |
| 6 | Newtown | Powys 007 | W02000103 | |
| | | Powys 008 | W02000104 | |
| | | Powys 009 | W02000105 | |
| 7 | Llandrindod and Rhayader | Powys 012 | W02000108 | |
| | | Powys 013 | W02000109 | |
| 8 | Knighton and Presteigne | Powys 011 | W02000107 | |
| 9 | Builth and Llanwrtyd | Powys 014 | W02000110 | |
| 10 | Ystradgynlais | Powys 021 | W02000416 | |
| 11 | Hay and Talgarth | Powys 015 | W02000111 | Partially in BBNP |
| 12 | Brecon | Powys 020 | W02000414 | Partially in BBNP |
| | | Powys 017 | W02000113 | Entirely within BBNP |
| 13 | Crickhowell | Powys 018 | W02000114 | Mostly in BBNP |

4.9. The extent of these zones is shown on the map provided at Appendix 1.

## Population

4.10. Base line 2021 population levels for the 13 zones have been obtained from Experian and are based on ONS 2021 mid-year estimates at Local Authority District level (released June 2022) and Census 2021 population estimates at Local Authority District level. Projected population levels for the end of the plan period (2037) and the intervening years of 2023, 2025 and 2030 and 2035 have been obtained from the same Experian source and are as follows (based on ONS 2018–2043 projections by Local Authority and year updated August 2020):

**Table 4.2: Population by Zone**

| Population | Zone 1 Llanfyllin | Zone 2 Machynlleth | Zone 3 Llanfair Caereinion | Zone 4 Welshpool & Montgomery | Zone 5 Llanidloes | Zone 6 Newtown | Zone 7 Llandrindod & Rhayader | Zone 8 Knighton & Presteigne | Zone 9 Builth & Llanwrtyd | Zone 10 Ystradgynlais | Zone 11 Hay & Talgarth | Zone 12 Brecon | Zone 13 Crickhowell | Total |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 2011 Census | 9,114 | 6,206 | 6,306 | 18,448 | 6,628 | 17,077 | 12,371 | 9,945 | 7,035 | 10,210 | 8,340 | 14,264 | 6,942 | 132,886 |
| 2021 | 9,166 | 6,414 | 6,394 | 18,714 | 6,768 | 17,356 | 12,811 | 10,143 | 7,093 | 10,345 | 8,703 | 14,461 | 7,257 | 135,625 |
| 2023 | 9,162 | 6,375 | 6,382 | 18,651 | 6,712 | 17,244 | 12,746 | 10,135 | 7,081 | 10,267 | 8,764 | 14,425 | 7,199 | 135,143 |
| 2025 | 9,200 | 6,372 | 6,408 | 18,680 | 6,698 | 17,287 | 12,697 | 10,116 | 7,090 | 10,272 | 8,798 | 14,460 | 7,181 | 135,259 |
| 2030 | 9,238 | 6,383 | 6,459 | 18,670 | 6,693 | 17,362 | 12,600 | 10,064 | 7,128 | 10,282 | 8,830 | 14,533 | 7,215 | 135,457 |
| 2035 | 9,282 | 6,406 | 6,529 | 18,695 | 6,700 | 17,449 | 12,537 | 10,020 | 7,167 | 10,288 | 8,847 | 14,648 | 7,201 | 135,769 |
| 2037 | 9,308 | 6,434 | 6,554 | 18,711 | 6,694 | 17,499 | 12,516 | 10,002 | 7,191 | 10,284 | 8,850 | 14,684 | 7,188 | 135,915 |

*Notes*

*2011 Population from Census*

*2018 Population estimates and 2022 - 2037 projections from Experian*

4.11. This Experian data suggests that without migratory factors, the population of Powys would remain relatively static across the area, with less than 300 additional people expected to be living in the area by 2037 compared with 2021. This represents an increase of just 0.2% over the Replacement Plan period.

## Available Expenditure

4.12. Available expenditure per head has also been obtained from Experian for both convenience and comparison goods by zone. This has then been adjusted to remove money spent at outlets other than traditional shops, such as markets and online. This is known as 'Special Forms of Trading' (SFT). The reduction made is in line with the national average, as estimated by Experian (ERPBN20).

4.13. The available spend per head forecasts for future years are then calculated, again using Experian's latest projections (ERPBN20). The resulting available convenience expenditure by zone is set out in Table 4.3 and comparison spend per head in Table 4.4.

**Table 4.3: Convenience Expenditure per Head 2021 - 2037 (2021 prices)**

| Convenience Expenditure per Head (£) (2021 prices) | Zone 1 | Zone 2 | Zone 3 | Zone 4 | Zone 5 | Zone 6 | Zone 7 | Zone 8 | Zone 9 | Zone 10 | Zone 11 | Zone 12 | Zone 13 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Llanfyllin | Machynlleth | Llanfair Caereinion | Welshpool & Montgomery | Llanidloes | Newtown | Llandrindod & Rhayader | Knighton & Presteigne | Builth & Llanwrtyd | Ystradgynlais | Hay & Talgarth | Brecon | Crickhowell |
| 2021 | £2,924 | £2,883 | £2,805 | £2,774 | £2,902 | £2,623 | £2,911 | £2,956 | £2,795 | £2,698 | £2,991 | £2,841 | £3,070 |
| 2021 exc SFT | £2,754 | £2,716 | £2,642 | £2,613 | £2,734 | £2,471 | £2,742 | £2,785 | £2,633 | £2,542 | £2,818 | £2,676 | £2,892 |
| 2023 exc SFT | £2,511 | £2,475 | £2,408 | £2,382 | £2,492 | £2,252 | £2,499 | £2,538 | £2,400 | £2,317 | £2,568 | £2,439 | £2,636 |
| 2025 exc SFT | £2,486 | £2,451 | £2,384 | £2,358 | £2,467 | £2,230 | £2,475 | £2,513 | £2,376 | £2,293 | £2,543 | £2,415 | £2,610 |
| 2030 exc SFT | £2,476 | £2,441 | £2,375 | £2,349 | £2,457 | £2,221 | £2,465 | £2,503 | £2,366 | £2,284 | £2,532 | £2,405 | £2,599 |
| 2035 exc SFT | £2,483 | £2,448 | £2,382 | £2,356 | £2,464 | £2,227 | £2,472 | £2,510 | £2,374 | £2,291 | £2,540 | £2,413 | £2,607 |
| 2037 exc SFT | £2,488 | £2,453 | £2,387 | £2,360 | £2,469 | £2,232 | £2,477 | £2,515 | £2,378 | £2,296 | £2,545 | £2,417 | £2,612 |

*Notes*

*2021 Convenience Expenditure from Experian*

*2021 Convenience expenditure exc SFT allows for SFT at 5.8% (Experian Retail Planner Briefing Note 20, Figure 5)*

*2023 - 2037 Projected expenditure based on expected change in spend (Experian Retail Planner Briefing Note 20, Figure 7)*

**Table 4.4: Comparison Expenditure per Head 2021 - 2037 (2021 prices)**

| Comparison Expenditure per Head (£) (2021 prices) | Zone 1 | Zone 2 | Zone 3 | Zone 4 | Zone 5 | Zone 6 | Zone 7 | Zone 8 | Zone 9 | Zone 10 | Zone 11 | Zone 12 | Zone 13 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Llanfyllin | Machynlleth | Llanfair Caereinion | Welshpool & Montgomery | Llanidloes | Newtown | Llandrindod & Rhayader | Knighton & Presteigne | Builth & Llanwrtyd | Ystradgynlais | Hay & Talgarth | Brecon | Crickhowell |
| 2021 | £4,224 | £3,918 | £3,975 | £3,905 | £4,093 | £3,632 | £3,560 | £4,133 | £3,570 | £3,559 | £4,218 | £4,191 | £4,495 |
| 2021 exc SFT | £3,012 | £2,794 | £2,834 | £2,784 | £2,918 | £2,590 | £2,538 | £2,947 | £2,545 | £2,538 | £3,007 | £2,988 | £3,205 |
| 2023 exc SFT | £3,041 | £2,821 | £2,862 | £2,812 | £2,947 | £2,615 | £2,563 | £2,976 | £2,570 | £2,562 | £3,037 | £3,017 | £3,236 |
| 2025 exc SFT | £3,026 | £2,807 | £2,848 | £2,797 | £2,932 | £2,602 | £2,550 | £2,961 | £2,557 | £2,550 | £3,022 | £3,002 | £3,220 |
| 2030 exc SFT | £3,530 | £3,274 | £3,322 | £3,264 | £3,421 | £3,035 | £2,975 | £3,454 | £2,984 | £2,974 | £3,525 | £3,503 | £3,757 |
| 2035 exc SFT | £4,033 | £3,741 | £3,795 | £3,729 | £3,908 | £3,468 | £3,399 | £3,946 | £3,409 | £3,398 | £4,027 | £4,002 | £4,292 |
| 2037 exc SFT | £4,262 | £3,953 | £4,011 | £3,940 | £4,130 | £3,665 | £3,592 | £4,170 | £3,602 | £3,591 | £4,256 | £4,229 | £4,536 |

*Notes*

*2021 Comparison Expenditure from Experian*

*2021 Comparison expenditure exc SFT allows for SFT at 28.7% (Experian Retail Planner Briefing Note 20, Figure 5)*

*2023 - 2037 Projected expenditure based on expected change in spend (Experian Retail Planner Briefing Note 20, Figure 7)*

4.14. Tables 4.3 and 4.4 show the same trends as outlined above, with convenience spend per head declining during the plan period, whilst comparison spend does not start increasing until 2030.

4.15. The effect of the changes in population and expenditure are then set out in Tables 4.5 (convenience) and Table 4.6 (comparison).

**Table 4.5: Total Available Convenience Expenditure 2021 - 2037 excluding SFT (2021 prices)**

| Convenience Expenditure per Head (£m) (2021 prices) | Zone 1 | Zone 2 | Zone 3 | Zone 4 | Zone 5 | Zone 6 | Zone 7 | Zone 8 | Zone 9 | Zone 10 | Zone 11 | Zone 12 | Zone 13 | Total (£m) | Change in Expenditure from 2021 (£m) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Llanfyllin | Machynlleth | Llanfair Caereinion | Welshpool & Montgomery | Llanidloes | Newtown | Llandrindod & Rhayader | Knighton & Presteigne | Builth & Llanwrtyd | Ystradgynlais | Hay & Talgarth | Brecon | Crickhowell | | |
| 2021 | £26.80 | £18.49 | £17.94 | £51.91 | £19.64 | £45.52 | £37.29 | £29.98 | £19.82 | £27.91 | £26.03 | £41.08 | £22.28 | £384.71 | |
| 2021 exc SFT | £25.25 | £17.42 | £16.89 | £48.90 | £18.50 | £42.88 | £35.13 | £28.24 | £18.68 | £26.29 | £24.52 | £38.70 | £20.99 | £362.40 | |
| 2023 exc SFT | £23.00 | £15.78 | £15.37 | £44.42 | £16.72 | £38.84 | £31.86 | £25.72 | £16.99 | £23.78 | £22.51 | £35.19 | £18.98 | £329.17 | -£33.23 |
| 2025 exc SFT | £22.87 | £15.62 | £15.28 | £44.05 | £16.52 | £38.54 | £31.42 | £25.42 | £16.85 | £23.56 | £22.37 | £34.92 | £18.74 | £326.15 | -£36.25 |
| 2030 exc SFT | £22.87 | £15.58 | £15.34 | £43.85 | £16.44 | £38.56 | £31.05 | £25.19 | £16.87 | £23.49 | £22.36 | £34.96 | £18.75 | £325.31 | -£37.09 |
| 2035 exc SFT | £23.05 | £15.68 | £15.55 | £44.04 | £16.51 | £38.87 | £30.99 | £25.15 | £17.01 | £23.57 | £22.47 | £35.34 | £18.77 | £327.01 | -£35.38 |
| 2037 exc SFT | £23.16 | £15.78 | £15.64 | £44.17 | £16.53 | £39.06 | £31.00 | £25.16 | £17.10 | £23.61 | £22.52 | £35.50 | £18.78 | £328.01 | -£34.39 |

Table 4.6: Total Available Comparison Expenditure 2021 - 2037 excluding SFT (2021 prices)

| Comparison Expenditure per Head (£m) (2021 prices) | Zone 1 | Zone 2 | Zone 3 | Zone 4 | Zone 5 | Zone 6 | Zone 7 | Zone 8 | Zone 9 | Zone 10 | Zone 11 | Zone 12 | Zone 13 | Total (£m) | Change in Expenditure from 2021 (£m) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Llanfyllin | Machynlleth | Llanfair Caereinion | Welshpool & Montgomery | Llanidloes | Newtown | Llandrindod & Rhayader | Knighton & Presteigne | Builth & Llanwrtyd | Ystradgynlais | Hay & Talgarth | Brecon | Crickhowell | | |
| 2021 | £38.72 | £25.13 | £25.42 | £73.08 | £27.70 | £63.04 | £45.61 | £41.92 | £25.32 | £36.82 | £36.71 | £60.61 | £32.62 | £532.68 | |
| 2021 exc SFT | £27.61 | £17.92 | £18.12 | £52.10 | £19.75 | £44.95 | £32.52 | £29.89 | £18.05 | £26.25 | £26.17 | £43.21 | £23.26 | £379.80 | |
| 2023 exc SFT | £27.86 | £17.98 | £18.26 | £52.44 | £19.78 | £45.09 | £32.67 | £30.16 | £18.20 | £26.31 | £26.62 | £43.53 | £23.30 | £382.20 | £2.40 |
| 2025 exc SFT | £27.84 | £17.88 | £18.25 | £52.26 | £19.64 | £44.98 | £32.38 | £29.95 | £18.13 | £26.19 | £26.58 | £43.41 | £23.12 | £380.62 | £0.82 |
| 2030 exc SFT | £32.61 | £20.90 | £21.46 | £60.93 | £22.89 | £52.70 | £37.49 | £34.76 | £21.27 | £30.58 | £31.13 | £50.90 | £27.10 | £444.72 | £64.92 |
| 2035 exc SFT | £37.44 | £23.96 | £24.78 | £69.70 | £26.18 | £60.51 | £42.61 | £39.54 | £24.43 | £34.96 | £35.63 | £58.62 | £30.91 | £509.28 | £129.47 |
| 2037 exc SFT | £39.67 | £25.44 | £26.29 | £73.73 | £27.65 | £64.13 | £44.96 | £41.71 | £25.90 | £36.93 | £37.67 | £62.10 | £32.60 | £538.77 | £158.96 |

*Notes*

*From Tables 4.2 and 4.4*

4.16. Table 4.5 shows an expected decline in convenience spend over the plan period, as the population increase in the Powys plan area is not sufficient to offset the forecast decline in expenditure per head. Table 4.6 shows an increase in available spend of £64.92m by 2030 and £158.96m by 2037. However, figures for more than five years ahead must be treated with considerable caution given the forecast level of increase relies heavily on the assumptions made regarding the percentage uplift in expenditure per head per annum. Even a small change in such an assumption can have a considerable effect on the forecast over an extended period, given the compound effects.

4.17. It is also the case that the forecasts for the next five years may be subject to more change than would normally be expected, due to the impact of the Covid-19 pandemic.

### Market Shares

4.18. The next stage in the analysis is to estimate the amount of trade that would be expected to be retained by shops within Powys, i.e. the market share achieved.

4.19. As previously indicated the retail offer within the County has not changed significantly since the previous Retail Study was undertaken by NLP in 2015 and therefore for the purposes of this assessment the same retention levels have been assumed.

4.20. These have been estimated from the NLP study using the Total Available Spend in the study area from Table 3B and comparing that with the expected turnover within the zones as set out in Tables 10B to 13B. When those parts of the Brecon Beacons NPA are included, this suggests just under 71% of convenience spend (70.75%) is retained within the County.

4.21. For comparison spend the same approach has been adopted, using Tables 2C and 6C of the NLP study (2015 Addendum). This suggests that Powys centres, including those in the Brecon Beacons NPA retain around a third of comparison expenditure.

### Convenience and Comparison Capacity Assessment

4.22. The final stage of the process is to use this information to estimate how retail capacity may change in the future and the effect this will have on the need for retail floorspace.

4.23. For the baseline analysis this has been done assuming a ‘constant market share’ approach, meaning that it is assumed that there will be no change in the proportion of trade that centres and retail outlets in Powys attract.

4.24. This is a reasonable assumption for this level of analysis given the size and nature of the study area and the ‘constant market share ‘approach is widely used in strategic retail capacity forecasting. Any under- or over-trading at an individual store is likely to be balanced out by higher / lower spend elsewhere within the study area and the overall market share would not be affected. However, it does not take into account the effect changes in provision may have on shopping patterns, whether through the development of ‘committed’ developments or store closures, either within or outside the study area.

4.25. Although there is expected to be an increase in available comparison expenditure (as set out in Table 4.6) within the study area, it is not necessarily the case that this would be expected to lead to a need for additional comparison floorspace within the plan period. This is because, as well as increasing spend on SFT, it is also appropriate to make an allowance for existing businesses to improve their performance (sales efficiency improvements).

4.26. The latter is important as existing retailers generally need to improve their turnover in real terms (i.e. excluding inflation) to maintain profitability at a time when business costs are increasing in real terms. Further, there is considerable potential for them to do so, as many retailers have seen their sales densities (turnover per sqm of floorspace) fall since the 2008 / 09 recession.

4.27. Experian considers that the recent economic challenges and squeezes of household spend mean that in the short term convenience retailers will see a decline in their sales performance, with sales densities expected to decline in 2022, 2023 and 2024. After that however, marginal improvements of 0.2% per annum are expected in the period to 2029 and 0.4% per annum from 2030 to 2040.

4.28. Comparison performance is expected to be stronger with annual increases of 2.1% per annum from 2025 to 2029 and 3.0% per annum from 2030. This is after small declines in 2023 (-0.5%) and 2024 (-0.4%) (ERPBN20, Figures 3a & 3b).

4.29. This improved performance of existing businesses will reduce the capacity (need) for new retail floorspace and in the case of Powys results in negative quantitative needs in relation to both convenience and comparison floorspace throughout the plan period (except for a minimal requirement in 2023 for convenience, reflecting the temporary decline in existing store performances.

4.30. The convenience results are presented in Table 4.7.

**Table 4.7: Convenience Capacity - Powys (Base excluding Commitments**

| | | 2021 | 2023 | 2025 | 2030 | 2035 |
|---|---|---|---|---|---|---|
| Total Available Convenience Expenditure in Study Area (£m) | (a) | £362.40 | £329.17 | £326.15 | £325.31 | £327.01 |
| Current Market share of Convenience destinations in study area | (b) | 70.8% | 70.8% | 70.8% | 70.8% | 70.8% |
| Available Convenience Expenditure for destinations in study area | (c) | £256.40 | £232.89 | £230.75 | £230.16 | £231.36 |
| *Change in available spend to study area destinations (cumulative from 2021)* | *(d)* | | *-£23.51* | *-£25.64* | *-£26.24* | *-£25.03* |
| Turnover of Convenience destinations (assuming no change in provision or sales efficiences) | (e) | £256.40 | £256.40 | £256.40 | £256.40 | £256.40 |
| Turnover of Convenience destinations (allowing for changes in sales efficiences) | (f) | £256.40 | £232.39 | £232.16 | £234.96 | £239.70 |
| **Residual Convenience spend to support new convenience floorspace (cumulative) (£m)** | **(g)** | | £0.49 | -£1.41 | -£4.80 | -£8.33 |
| Benchmark Sales density for Convenience Floorspace (£ per sqm) | (h) | | £9,553 | £9,575 | £9,824 | £9,824 |
| **Amount of new convenience floorspace required (cumulative) (sqm net)** | **(j)** | | **52** | **-147** | **-489** | **-848** |

*Notes*
*(a) From Table 3*
*(b) Calculated from NLP Retail Study (Tables 3B & 13B)*
*(c) (a) x (b)*
*(d) Calculated from (c)*
*(e) Based on (b)*
*(f) Calculated from (e) using forecast changes in sales efficiences from Experian Retail Planner Briefing Note 20, Figure 3a*
*(g) From (c) -(f)*
*(h) From Experian Retail Planner Briefing Note 20, Figure 3a*
*(i) Calculated from (g) and (h)*

4.31. The equivalent comparison capacity assessment is provided in Table 4.8.

Table 4.8: Comparison Capacity - Powys (Base excluding Commitments)

| | | 2021 | 2023 | 2025 | 2030 | 2035 |
|---|---|---|---|---|---|---|
| Total Available Comparison Expenditure in Study Area | (a) | £379.80 | £382.20 | £380.62 | £444.72 | £509.28 |
| Current Market share of Comparison destinations in study area | (b) | 33.3% | 33.3% | 33.3% | 33.3% | 33.3% |
| Available Comparison Expenditure for destinations in study area | (c) | £126.47 | £127.27 | £126.75 | £148.09 | £169.59 |
| *Change in available spend to study area destinations (cumulative)* | *(d)* | | *£0.80* | *£0.27* | *£21.62* | *£43.11* |
| Turnover of Comparison destinations (assuming no change in provision or sales efficiences) | (e) | £126.47 | £126.47 | £126.47 | £126.47 | £126.47 |
| Turnover of Comparison destinations (allowing for changes in sales efficiences) | (f) | £126.47 | £130.12 | £132.32 | £148.11 | £171.70 |
| **Residual Comparison spend to support new comparison floorspace (cumulative)** | **(g)** | | -£2.85 | -£5.58 | -£0.01 | -£2.11 |
| Benchmark Sales density for Comparison Floorspace (£ per sqm) | (h) | | £4,444 | £4,675 | £5,893 | £5,893 |
| **Amount of new comparison floorspace required (cumulative) (sqm net)** | **(i)** | | **-641** | **-1193** | **-2** | **-357** |

*Notes*
*(a) From Table 5*
*(b) Calculated from NLP Retail Study (Table 6C)*
*(c) (a) x (b)*
*(d) Calculated from (c)*
*(e) Based on (b)*
*(f) Calculated from (e) using forecast changes in sales efficiences from Experian Retail Planner Briefing Note 20, Figure 3a*
*(g) From (c) -(f)*
*(h) From Experian Retail Planner Briefing Note 20, Figure 3b*
*(i) Calculated from (g) and (h)*

4.32. Table 4.8 shows variable negative demand for additional comparison floorspace throughout the plan period.

4.33. It is also important to note that these assessments do not make any allowance for existing commitments or site allocations. Were they to do so, this would suggest a greater oversupply of floorspace within Powys.

4.34. This, purely quantitative assessment therefore suggests that even before allowing for known retail commitments and allocations, there is already more than sufficient convenience and comparison floorspace within Powys to meet the identified needs during the plan period.

## Qualitative Retail Needs

4.35. However, whilst precedence is given to quantitative need when undertaking an assessment of retail need, PPW also sets out instances when it may be appropriate to give weight to qualitative needs in emerging development plan policies, specifically where:

- The identified need would support the objectives and retail strategy being proposed;
- Development is within a centre that is highly accessible by walking, cycling or public transport;
- Development will contribute to a substantial reduction in car journeys;
- Contributes to the co-location of facilities in an existing centre;
- Significantly contributes to the vibrancy, attractiveness and viability of a centre;
- Assists in alleviating over-trading or local traffic congestion; or
- Addresses locally defined deficiencies in provision, including a lack of convenience provision in a disadvantaged area.

4.36. Some of these needs may arise from other decisions regarding plan objectives and policies and as such it is not appropriate for us to comment at this stage. However, it is also appropriate to consider whether there is any evidence of qualitative needs within the County, and to do this the health checks undertaken by Owen Davies Consulting have been reviewed in the context of the 13 localities defined above, given that qualitative needs are more likely to be apparent at a more local level.

4.37. The qualitative need assessments are based on the Experian forecasts for population change and do not reflect policy interventions that may be proposed in the RLDP, which could affect the locations for new housing development or local population levels.

### Zone 1 Llanfyllin

4.38. This zone in the north of the County and Table 4.2 indicates a small increase in population over the Plan period. Available expenditure for convenience goods was £25.25m in 2021 decreasing to £22.87m by 2030 and £23.16m by 2037. Comparison expenditure is expected to increase from £27.61m in 2021 to £32.61m in 2030 and £39.67m in 2037.

4.39. The area includes the Local Retail Centre (LRC) of **Llanfyllin,** which the RTCHHB report suggests should be classified as a Local Town in the proposed town centre hierarchy. The centre consists of 28 retail and service units, with a strong convenience offer and a good range of service and leisure uses. The comparison offer is more limited being mainly provided by small independent retailers but includes a chemist, women's' clothing/fashion shop and three outlets selling gifts/china/leather goods.

4.40. In terms of leisure uses there are eight businesses in the centre with average or an above average provision of accommodation, bars, pubs and clubs, cafes and fast food and restaurants. The only category of leisure not provided for is entertainment, which is not unexpected given the size of the centre. Service representation is also limited, but key uses such as a financial services outlet and a Post Office (within the Spar) are present. Community uses are also provided within the centre.

4.41. The centre is dominated by independent businesses with just three national multiples represented.

4.42. There are no vacant units within the centre and ODC concludes that it provides an important top up role for the extensive rural area that it serves.

4.43. The role of the centre is not expected to change significantly in the future and population growth will be small. It would therefore be expected that the centre will continue to act as a top up centre providing for the day to day needs of its catchment, with higher order retail goods and services provided in the nearby centres of Welshpool, Oswestry and Shrewsbury.

4.44. Although not all types of convenience business are represented in the centre there is no qualitative need for further convenience provision, given the declining available expenditure over the plan period. Similarly, there is no qualitative requirement for further comparison provision, as much of the increase in spend will be absorbed by higher online sales and improvements to the performance of existing businesses.

4.45. As a result, whilst there are no vacancies to allow new retail, leisure or service operators to come into the town, it is not considered that there is any requirement to allocate a site for the expansion of town centre uses, although a flexible approach should be adopted should any proposals for improving the retail and town centre offer in the centre come forward.

### Zone 2 Machynlleth

4.46. This zone is in the north-west of the County and Table 4.2 indicates an almost static population during the Plan period. Available expenditure for convenience goods was £17.42m in 2021 decreasing to £15.58m by 2030 and £15.78m by 2037. Comparison expenditure is expected to increase from £17.92m in 2021 to £20.90m in 2030 and £25.44m in 2037.

4.47. The area includes the Area Retail Centre (ARC) of **Machynlleth** one of the largest retail centres in the County reflecting its wider catchment that extends beyond the immediate MSOA area to include other parts of Powys and parts of Gwynedd to the north. It is also accessible from the northern parts of Ceredigion and has an important function as a tourist destination.

4.48. The RTCHHB report suggests that Machynlleth should be classified as one of the six Primary Towns in the proposed town centre hierarchy.

4.49. The centre consists of 65 retail and service units, with a strong comparison offer. The proportion of convenience outlets is similar to the Powys average, but the centre has a slightly below average proportion of leisure and service uses. The comparison offer is relatively varied but appears to be a mix of businesses aimed at meeting higher order local needs such as furniture and carpets and more tourist / leisure orientated outlets selling books / arts and crafts/stationery. There are just two footwear outlets in the centre and none selling fashion and general clothing.

4.50. In terms of leisure uses there are 11 businesses in the centre with just one providing accommodation and the rest being F&B outlets. There is no entertainment provision, despite Machynlleth being an ARC. There is also limited service provision with representation in just four categories – banks/financial services /building societies, employment/post offices, estate agents/ auctioneers and hairdressing/health and beauty.

4.51. The centre is dominated by independent businesses with 11 businesses being national multiples.

4.52. Of the 65 units in the centre, five are currently vacant representing a vacancy rate of 8%, which is slightly below the Powys average of 11%.

4.53. The health check for the centre notes the low proportion of health and beauty and fashion outlets as a concern along with the lack of quality and range of choice in shopping, leisure and entertainment facilities in comparison to other centres. This is likely to be due to the accessibility of Aberystwyth and Newtown, both of which have a more extensive retail offer and are accessible from much of Machynlleth's catchment.

4.54. It is therefore unlikely that there will be demand from national multiples wishing to open new retail, service or leisure outlets in the town, whilst the current vacancies provide some opportunities for new independent businesses. It is therefore considered that there is no qualitative or quantitative requirement to allocate a site for the expansion of town centre uses, although a flexible approach should be adopted should any proposals for improving the retail and town centre offer in the centre come forward.

### Zone 3 Llanfair Caereinion

4.55. This zone is in the north central part of the County and Table 4.2 indicates a small increase in population over the Plan period. Available expenditure for convenience goods was £16.89m in 2021 decreasing to £15.34m by 2030 and £15.64m by 2037. Comparison expenditure is expected to increase from £18.12m in 2021 to £21.46m in 2030 and £26.29m in 2037.

4.56. The area includes the Local Retail Centre (LRC) of **Llanfair Caereinion** which the RTCHHB report suggests should be classified as a Local Town in the proposed town centre hierarchy. The centre consists of 15 retail and service units, with a strong service offer (six units). The centre also includes three convenience outlets, four leisure units and a single comparison operator. There is a further convenience unit (Londis) outside of the centre.

4.57. The operators include three national multiples (21%) (Spar, Post Office and NFU Mutual) which is relatively high for the size of centre, but, with four of the service uses being in the hairdressing/health and beauty category, the offer is limited and only caters for the main day to day needs. However, with just one unit being vacant, the centre is providing what is required by its catchment population.

4.58. The role of the centre is not expected to change significantly in the future and population growth will be small. It would therefore be expected that the centre will continue to act as a top up centre providing for the day to day needs of its catchment. Higher order retail goods and services will be provided in the nearby centres of Welshpool and Newtown.

4.59. With limited population growth expected in the area and the proximity of two Area Retail Centres, it is considered that, in addition to very limited quantitative need, there is unlikely to be any clear qualitative need for further retail provision. It is therefore considered that there is no requirement to allocate a site for the expansion of town centre uses, although a flexible approach should be adopted should any proposals for improving the retail and town centre offer in the centre come forward.

### Zone 4 Welshpool and Montgomery

4.60. Zone 4 is located in the north-east of Powys County and includes the Area Retail Centre (ARC) of **Welshpool** and the Local Retail Centre (LRC) of **Montgomery**. The RTCHHB report suggests that Welshpool should be classified as a Primary Town in the proposed town centre hierarchy and Montgomery as a Local Town.

4.61. The zone had a population of 18,714 in 2021, the highest in the study area and Table 4.2 indicates a stable, static population over the Plan period. Available expenditure for convenience goods was £48.90m in 2021 decreasing to £43.85m by 2030 and £44.17mm by 2037. Comparison expenditure is expected to increase from £52.10m in 2021 to £60.93m in 2030 and £73.73m in 2037.

4.62. **Welshpool** is one of the largest centres in Powys, with 170 retail and service units. It has an above average proportion of comparison units compared with the Powys average and slightly below average convenience and leisure provision.

4.63. In terms of the comparison offer, most of the main categories of business are represented in the centre, with above average numbers of fashion and general clothing retailers and electrical goods and home entertainment. The convenience offer includes a Morrisons supermarket, bakers, butchers and fishmongers, a confectionery/tobacco/newsagent outlet and two further food retailers. There is also a Tesco and an Aldi outside of the town centre boundary. However, Sainsbury's, the Co-op and Iceland have all closed units in the centre in recent years.

4.64. In terms of the town's leisure offer it is generally similar to the Powys average, with some representation in all categories except accommodation. The service offer is slightly above average due mainly to a high number of hairdressing/health and beauty outlets but other key categories are represented. A banking hub opened in the centre in early 2024.

4.65. The centre has a good representation of national multiples, but the proportion of independents is average for Powys at 80%.

4.66. The proportion of vacant units is also close to the Powys average at 11%, representing 19 vacant units. However, some of these are larger units.

4.67. ODC concludes that Welshpool is an important centre for the area, providing an administrative and employment role as well as being the main shopping, leisure and service destination in north-east Powys. However, it would appear that national multiple representation has declined in the centre over recent years (if not within the town as a whole), reflecting national trends. The number of vacant units also suggests that there is no restriction on new entrants coming to the town and therefore it is not considered that there is any requirement for the expansion of town centre uses in the centre. However, a flexible approach should be adopted should any proposals for improving the retail and town centre offer in the centre come forward.

4.68. The role of **Montgomery** as a LRC located just 7 miles to the south of Welshpool is to meet the day to day needs of its localised catchment area but it is also an important tourist destination. It provides a total of 18 units, half of which are in the leisure category, which is double the Powys average. The offer also has an above average offer of accommodation (three units) reflecting its tourist role and cafes and fast food (three units).

4.69. In terms of retail, the convenience offer is below the Powys average in terms of units with just one convenience store in the centre which is operated by Spar. The comparison offer is also below the Powys average and comprises just five units. Services are also limited to a Post Office (within the Ivy House café), auto services and a hair salon.

4.70. Only the convenience store is operated by a national multiple (Spar), with the rest being independent businesses. There were no vacant units at the time of the ODC survey.

4.71. If Montgomery was a more remote centre, then the lack of convenience provision or vacancies, might suggest a qualitative need for additional retail / town centre provision to allow the expansion of the offer. In practice though, the proximity of Welshpool with its strong convenience offer within the town (if not within the town centre) and declining capacity during the plan period, means that the qualitative need for further provision is limited. Similarly, it would be expected that any comparison provision would be more likely to be attracted to Welshpool. Therefore, it is considered that there is no qualitative need for further retail development in the town to meet local needs. However, new development to support tourism and day visitors may be appropriate and, whilst we do not consider that a site needs to be allocated for this, a flexible approach should be adopted should any such proposals come forward.

## Zone 5 Llanidloes

4.72. This zone in the north central part of the County had a population of 6,768 in 2021 and Table 4.2 indicates a small decline during the Plan period (based on Experian data). Available expenditure for convenience goods was £18.50m in 2021 decreasing to £16.44m by 2030 and £16.53m by 2037.

Comparison expenditure is expected to increase from £19.75m in 2021 to £22.89m in 2030 and £27.65m in 2037.

4.73. The area includes the Area Retail Centre (ARC) of **Llanidloes** which the RTCHHB report suggests should be classified as a Primary Town in the proposed town centre hierarchy. The centre consists of 86 retail and service units, with a strong convenience, comparison and leisure offer. The service offer is considerably more limited, although it includes a Post Office (within the Spar), three estate agents/auctioneers and four hairdressing/health and beauty outlets.

4.74. The convenience offer includes two other convenience stores, in addition to the Spar, three bakers and two butchers/fishmongers and one outlet selling confectionery/tobacco/newsagents. There is also a Co-op in the town although this is located outside of the town centre.

4.75. The comparison offer is provided in 25 units and is relatively wide ranging, whilst the leisure offer includes an above average proportion of restaurants, accommodation and F&B outlets, with only entertainment being under-represented.

4.76. The centre includes 10 national multiples (15%) which is slightly below the Powys average of 20% of units and has an above average vacancy rate at 21% compared with a Powys average of 12%.

4.77. ODC notes that Llanidloes is an important retail, service, leisure and commercial destination which serves a large rural hinterland and an increasing visitor economy, although it is also relatively close to Newtown.

4.78. With a relatively high vacancy rate at present, a slightly decreasing population and the draw of Newtown, it is not considered that there is a qualitative need for further retail provision in the centre and therefore no requirement to allocate a site for the expansion of town centre uses However, a flexible approach should be adopted should any proposals for improving the retail and town centre offer in the centre come forward.

### Zone 6 Newtown

4.79. Zone 6 is in the north central part of the County and had a population of 17,356 in 2021, the second highest of the study area zones. Table 4.2 indicates a small increase is expected during the Plan period. Available expenditure for convenience goods was £42.88mm in 2021 decreasing to £38.56mm by 2030 and £39.06m by 2037. Comparison expenditure is expected to increase from £44.95m in 2021 to £52.70m in 2030 and £64.13m in 2037.

4.80. The area includes the Area Retail Centre (ARC) of **Newtown** which is the main shopping, leisure, service and commercial destination in Powys. The RTCHHB report suggests should be classified as a Sub Regional Centre in the proposed town centre hierarchy to reflect this. It consists of 178 retail and service units, with a balanced mix of uses.

4.81. The convenience offer comprises a total of 13 units including six supermarkets and food stores, three butchers /fishmongers and three newsagents/confectionery/tobacco outlets. This is slightly below the Powys average, but there are a number of national supermarkets located elsewhere in the town.

4.82. The comparison offer is provided in 44 units, a proportion that is slightly below the Powys average, but the range of categories represented is good. Fashion and general clothing provision is above average.

4.83. The service and leisure offers are also diverse, with slightly above average provision of bars, pubs and clubs, banks, financial services and building societies and hairdressing/health and beauty. There is also a higher proportion of national multiples within the centre – represented in 25% of all units compared with the Powys average of 20%. However, vacancy rates are also above average at 18% (Powys average 12%), with 32 units vacant. This reflects a decline in the comparison offer in recent years.

4.84. With a balanced retail, leisure and service offer and relatively a high vacancy rate at present, it is not considered that there is a qualitative need for further retail provision in the centre and therefore no requirement to allocate a site for the expansion of town centre uses. However, a flexible approach should be adopted should any proposals for reusing vacant units or improving the retail and town centre offer in the centre come forward.

### Zone 7 Llandrindod Wells and Rhayader

4.85. Centrally located Zone 7 covers both the Area Retail Centre of **Llandrindod Wells** and the District Retail Centre (DRC) of **Rhayader** and Table 4.2 indicates a small decline in population is expected during the Plan period. Available expenditure for convenience goods was £35.13m in 2021 decreasing to £31.05m by 2030 and £31.00m by 2037. Comparison expenditure is expected to increase from £32.52m in 2021 to £37.49m in 2030 and £44.96m in 2037.

4.86. The area includes the Area Retail Centre (ARC) of **Llandrindod Wells** which the RTCHHB report suggests should be classified as a Primary Town in the proposed town centre hierarchy.

4.87. The centre consists of 68 retail and service units, with a strong service offer. This includes a higher than average proportion of hairdressing/health and beauty outlets, estate agents and auctioneers, and banks/financial services and building societies.

4.88. The convenience offer consists of just four units in the town centre, with the main supermarket (Tesco) located outside of the centre. The overall comparison offer is just slightly below the Powys average, but the range of outlets is quite limited. There is above average provision of furniture/carpets / textiles/bathrooms and kitchen and charity and second-hand shops, but no fashion or general clothing retailers, discount or surplus stores, footwear outlets or pet supplies or electrical goods retailers.

4.89. The leisure offer is also very limited with just nine units in this use and only entertainment provision being above average.

4.90. The centre includes just three national multiples, although this is the same proportion as the Powys average (21%) and 11 vacant units representing an above average vacancy rate of 15%.

4.91. ODC raises a concern regarding the lack of quality and range of choice of shopping, leisure and entertainment facilities in the centre and it would seem that a qualitative improvement in the offer is desirable. However, it appears the demand for premises has weakened and therefore the priority should be in seeking to encourage the reoccupation of vacant properties rather than expanding the retail provision.

4.92. However, a flexible approach should be adopted should any proposals for improving the retail and town centre offer in the centre come forward, including proposals that would see the redevelopment of existing surplus space.

4.93. The DRC of **Rhayader** seeks to meet the retail needs of its catchment population and those of visitors to the area and the RTCHHB report suggests should be classified as a Secondary Town in the proposed town centre hierarchy. It provides a total of 41 retail and service uses, with an above average convenience and comparison offer but limited service offer.

4.94. The centre has a total of five convenience outlets located within it, including a Co-op, a newsagent and a butcher. The comparison offer is provided in 16 units, with a quarter of these units occupied by car/motorbike showrooms. The rest of the offer is more limited to just one or two units within a category, and no provision at all in some key categories.

4.95. The leisure offer is close to the Powys average and comprises 10 units all categories of business except entertainment represented. The service offer is provided in 10 units covering four categories of business.

4.96. The mix of national multiples and independent businesses is the same as the Powys average and no vacant units were identified at the time of the ODC survey. This leads ODC to conclude that Rhayader is a high performing centre and notes that there is no out of centre retail provision.

4.97. It is considered that the lack of vacant units and the strong mix of town centre uses currently provided, suggests that there could be a qualitative need to expand the offer provided in Rhayader and the extension of the town centre boundary to include some of the existing uses would also provide more flexibility to allow further expansion of provision, should a demand emerge during the plan period.

### Zone 8 Knighton and Presteigne

4.98. This zone on the eastern side of the central area of the County and Table 4.2 indicates it is expected to see a small decline in population during the Plan period. Available expenditure for convenience goods was £28.24m in 2021 decreasing to £25.19m by 2030 and £25.16m by 2037. Comparison expenditure is expected to increase from £29.89m in 2021 to £34.76m in 2030 and £41.71m in 2037.

4.99. The area includes the District Retail Centres (DRC) of **Knighton and Presteigne** both of which the RTCHHB report suggests should be classified as Secondary Towns in the proposed town centre hierarchy.

4.100. **Knighton** DRC consists of 39 retail and service units, which ODC notes as being below the 2012 level. The mix of uses is close to the Powys average. It provides three convenience units, the main one being the Costcutter convenience store, although the main convenience store in the town is a Co-op which is located outside of the centre. The comparison offer consists of 14 units with good representation across the category types, with the books / arts and crafts/stationery and electrical goods / home entertainment and gifts/china and leather goods categories all having slightly above average representation.

4.101. The leisure offer includes an above average proportion of pubs/bars and clubs (four units) and an average proportion of cafes and fast food. Ther is also a museum in the centre. However, there is no restaurant provision in the centre. The range of the service offer is also limited, with half of all such units in the hairdressing/health and beauty category.

4.102. Despite being a DRC Knighton has a slightly above average proportion of national multiples (eight = 22%) and a low vacancy rate, with just two vacant units (5%) at the time of the survey. However, as

ODC notes the centre lacks a number of essential services such as a bank. There is a library, a doctor's surgery and a Post Office in the town, but these are located outside of the centre.

4.103. The relatively limited offer in Knighton is considered appropriate for a DRC and the limited number of vacant units suggests the centre is performing adequately. However, it seems that many of the town's retail and town centre uses are located outside of the defined centre and with the demand for retail space likely to decrease in the future, we consider that there is no qualitative need to consider expanding the retail offer within the centre. Indeed, the suggested changes by ODC to reduce the extent of the defined centre would seem a more appropriate response to market and local trends.

4.104. **Presteigne** DRC consists of 27 retail and service units, which ODC notes as being below the 2012 level. The centre has a strong convenience offer, average comparison and leisure offer but a limited service offer. Like nearby Knighton it has an above average proportion of units selling books/art and craft/ stationery and gifts/china and leather and also an above average proportion of charity and second-hand shops. Other provision however is limited.

4.105. The centre is well served by restaurants and cafes/fast food outlets but lacks any accommodation or entertainment offer. The range of service uses is also limited, although the centre does have a bank.

4.106. Despite being a DRC Presteigne has a slightly above average proportion of national multiples (six = 23%) and a low vacancy rate, with just one vacant unit (5%) at the time of the survey. However, as ODC notes there are a number of units on the edge of the centre that no longer appear to be lettable floorspace and so have been excluded from this vacancy figure.

4.107. The relatively limited offer in Presteigne is considered appropriate for a DRC and, with a single vacant unit it appears that the centre is performing adequately. Whilst ODC is proposing changes to the town centre boundary to better reflect the location of town centre uses, there is nothing to suggest a qualitative need for additional retail provision and therefore there is no requirement to allocate a site for future development.

### Zone 9 Builth Wells and Llanwrtyd

4.108. This zone in the central part of the County had a population of 7,093 in 2021 and Table 4.2 indicates it is expected to see a small increase during the Plan period. Available expenditure for convenience goods was £18.68m in 2021 decreasing to £16.87m by 2030 and £17.10m by 2037. Comparison expenditure is expected to increase from £18.05m in 2021 to £21.27m in 2030 and £25.90m in 2037.

4.109. The area includes the District Retail Centre (DRC) of **Builth Wells** and the Local Retail Centre (LRC) of **Llanwrtyd Wells.** The RTCHHB report suggests these should be classified as a Primary Town and a Local Town respectively in the proposed town centre hierarchy.

4.110. **Builth Wells** consists of 63 retail and service units, with a strong leisure offer. It includes seven bars, pubs and clubs, three accommodation uses and seven outlets providing food.

4.111. The convenience and comparison offer is close to the Powys average in terms of units and the mix of goods offered is good for the size of the centre. Fashion and general clothing is particularly well represented. The service offer is below the Powys average with hairdressing/health and beauty under-represented and estate agents/auctioneers slightly over represented.

4.112. The proportion of national multiples and vacancies is also close to the Powys average.

4.113. ODC notes that Builth Wells is one of the main comparison shopping and leisure destinations in mid Wales. It lacks a main food shopping facility within the centre, but this is provided by the Co-op outside of the town centre.

4.114. It is also clear that the number of units within the centre has been stable over recent years and vacancy levels are not exceptionally high. It would therefore appear that the centre is performing as required to serve its local catchment and other functions and there are opportunities for new entrants wishing to come into the area. Therefore, it is not considered that there is a qualitative need for further retail provision in the centre and therefore no requirement to allocate a site for the expansion of town centre uses. However, a flexible approach should be adopted should any proposals for improving the retail and town centre offer in the centre come forward.

4.115. **Llanwrtyd Wells is a LRC** and provides 14 retail and service units, with the highest proportion being in leisure uses, including two premises providing accommodation and four providing a F&B offer.

4.116. The convenience offer is limited to two units and there are just three units selling comparison goods, although these include clothing and furniture/textiles. There is just one unit in the service category.

4.117. Consistent with the status of the centre and limited offer, there are no national multiples represented in the centre. Vacancy rates are close to the Powys average with two units vacant at the time of the survey.

4.118. ODC notes that there is a filling station/garage, pharmacy and Post Office on the edge of the centre that add to the overall offer and vibrancy of the town but also notes a long-term decline in the centre with commercial premises being converted to residential use. As such it is not considered that there is any qualitative need to expand the retail or town centre uses in the centre and therefore no site allocation is required.

### Zone 10 Ystradgynlais

4.119. This zone in the southern part of the County beyond the Brecon Beacons National Park. Table 4.2 indicates that it is expected to see a small decline in population during the Plan period. Available expenditure for convenience goods was £26.29m in 2021 decreasing to £23.49m by 2030 and £23.61m by 2037. Comparison expenditure is expected to increase from £26.25m in 2021 to £30.58m in 2030 and £36.93m in 2037.

4.120. The area includes the District Retail Centre (DRC) of **Ystradgynlais** which the RTCHHB report suggests should be classified as a Secondary Town in the proposed town centre hierarchy. It consists of 35 retail and service units, with a strong convenience offer, including two grocery stores and two bakeries. The main convenience offer however is provided by a Tesco superstore to the south of the town centre.

4.121. The comparison offer is close to the Powys average in terms of the proportion of units in this use, and the categories of goods being sold is what would be expected for a DRC, including chemist, toiletries and health, clothing, pet related goods and charity shops. The leisure offer is more limited with five of the seven units operating as cafes/fast food outlets. The service offer includes two banks/financial services/building society outlets, four hairdressing/health and beauty outlets and a travel agent.

4.122. The centre includes seven national multiples (20%) which is the same as the Powys average and no vacant units were identified at the time of the survey.

4.123. ODC notes that Ystradgynlais has maintained or strengthened its offer as a DRC in recent years and suggests changes to the town centre boundary to include existing town centre uses located close by. This would also provide more flexibility in terms of accommodating any future demand for retail or town centre uses but it is not considered that there is any qualitative need to allocate a site for future development.

### Zone 11 Hay-on-Wye and Talgarth

4.124. Much of this zone, including Hay-on-Wye town centre is within the Brecon Beacons National Park Authority Area (BBNPA). As such it is outside the scope of this study.

### Zone 12 Brecon

4.125. Much of this zone, including Brecon town centre, is within the Brecon Beacons National Park Authority Area (BBNPA). As such it is outside the scope of this study.

### Zone 13 Crickhowell

4.126. Much of this zone, including Crickhowell town centre is within the Brecon Beacons National Park Authority Area (BBNPA). As such it is outside the scope of this study.

# 5. Review of Existing Retail, Leisure and Town Centre Planning Policies

5.1. This final section of the report, has been prepared jointly by RRPC and ODC and presents recommendations from both consultants regarding the need to update the retail and town centre policies in the Powys Adopted LDP. It also considers the need for new policies, both to ensure that the emerging plan meets the requirements set out in PPW and in the light of the finding of this report and the ODC Review of retail and town centre hierarchy, health and boundaries.

## Review of Powys Adopted Plan Policies

5.2. The existing policies relating to retail and town centres have been outlined above but these have been reviewed to assess whether any may require amendment as part of the development plan review. The conclusions are as follows:

- **Strategic Policy SP4 – Retail Growth** – this policy will need to be updated to reflect the latest quantitative and qualitative need assessment findings, namely that there is no requirement to allocate sites for development. However, it is suggested that the second part of the policy is retained to encourage the reuse of existing vacant premises. It may also be appropriate to make reference to redevelopment opportunities within the town centre being encouraged where commercial uses can be re-provided in a form appropriate to meet future occupier requirements.
- **Policy R1 – New Retail Development -** proposed changes to the retail hierarchy are set out in the ODC report (Figure 3). This is reproduced below:

<table>
<tr><th>Town Centre</th><th>Regional Growth Area</th><th>Current LDP Town Centre Hierarchy</th><th>Proposed hierarchy with new definitions</th></tr>
<tr><td>Newtown</td><td>✓</td><td rowspan="5">Area Retail Centre</td><td>Sub Regional Centre</td></tr>
<tr><td>Welshpool</td><td>✓</td><td rowspan="5">Primary Town</td></tr>
<tr><td>Llanidloes</td><td>✓</td></tr>
<tr><td>Llandrindod Wells</td><td>✓</td></tr>
<tr><td>Machynlleth</td><td></td></tr>
<tr><td>Builth Wells</td><td>✓</td><td rowspan="5">District Retail Centre</td></tr>
<tr><td>Rhayader</td><td>✓</td><td rowspan="4">Secondary Town</td></tr>
<tr><td>Knighton</td><td></td></tr>
<tr><td>Ystradgynlais</td><td></td></tr>
<tr><td>Presteigne</td><td></td></tr>
<tr><td>Llanfyllin</td><td></td><td rowspan="4">Local Retail Centre</td><td rowspan="4">Local Town</td></tr>
<tr><td>Montgomery</td><td></td></tr>
<tr><td>Llanfair Caereinion</td><td></td></tr>
<tr><td>Llanwrtyd Wells</td><td></td></tr>
</table>

- **Policy R2 – Retail Allocations -** there is no longer a quantitative or qualitative requirement to allocate a site for retail development in Presteigne and therefore the allocation of the former Kaye Foundry site in Presteigne (Site Allocation P51 MUA1) needs to be reviewed. As a site outside of the town centre boundary it may be more appropriate to support its development for retail and town centres uses if it can be shown to comply with the need, sequential and impact tests set out in national planning policy.

- **Policy R3 – Development within Town Centre Areas –** Parts 1 and 2 of this policy remain relevant. Possible revisions to the frontage policy should however be considered, as such policies can restrict the ability of a centre to respond to changing market needs, either because mixed uses may not fall into the defined categories, or it requires a unit to remain vacant before an alternative use can be justified. One option may be to consider the other types of uses that could be supported (elsewhere reference has been made to uses that provide an active frontage during daylight trading hours), rather than apply a % restriction to retain A1 and A3 uses.
- **Policy R4 – Neighbourhood and Village Shops and Services** – this has not been the subject of review as part of this study, but the retention of the policy would appear to be appropriate.

5.3. Possible wording for revised policies is provided below:

**Strategic Policy SP4 – Retail Growth**

5.4. The quantitative and qualitative need assessment for the Powys plan area has found there is no requirement to allocate new sites for retail development. Any additional need for convenience and comparison floorspace should first be accommodated in existing vacant premises. If there are no suitable premises available, then applications for new retail development must demonstrate compliance with the sequential and impact tests set out in national planning policy, and; Redevelopment opportunities within town centres are also encouraged where commercial uses can be re-provided in a form to meet future occupier requirements.

**Policy R1 – New Town Centre Development**

5.5. The town centre hierarchy of Powys is:

Sub Regional Centre - Newtown

Primary towns - Welshpool, Llanidloes, Llandrindod Wells, Machynlleth and Builth Wells

Secondary towns - Rhayader, Knighton, Ystradgynlais and Presteigne

Local towns - Llanfyllin, Montgomery, Llanfair Caereinion and Llanwrtyd Wells.

Within defined town centres proposals for new retail development or other uses complementary to retail and commercial centres, which would be of a scale and design appropriate to the settlement and in accordance with the town centre hierarchy will be supported. Proposals that would undermine the town centre hierarchy will not be permitted.

**Policy R2 – Development within defined Town Centres**

5.6. Within defined Town Centres proposals for new retail, leisure and commercial development will be permitted where:

- It is of an appropriate scale;
- It enhances the vitality and viability of the existing town centre and accords with Policy R1;
- Proposals widen the range of commercial use and encourage convenient and accessible shopping, service, leisure, civic, cultural, education, business, and health opportunities; and
- It provides an active frontage during daylight trading hours.

**Policy R3 – Development outside of defined Town Centres**

5.7. Proposals for retail, leisure and other development complementary to a retail or commercial centre outside of the defined Town Centres will be supported where the proposal complies with national planning policy and the other policies in this plan. Specifically, it must be demonstrated that:

- The proposal is of an appropriate scale;
- An impact assessment has been provided to demonstrate that the proposal would not have an adverse effect on the vitality and viability of the existing town centre, and
- Evidence of a sequential approach to the site selection has been demonstrated.

**Policy R4: Town Centre Areas: Primary and Secondary Frontages**

5.8. Within defined Primary Frontages in Newtown and Welshpool, proposals for non-retail uses including service, leisure, civic, cultural, education, business, and health will be permitted where they:

- Support and enhance the vitality and viability of the retail function;
- Provide an active frontage during daylight trading hours; and
- Do not propose a residential use on a ground floor.

Within defined Secondary Frontages proposals will be permitted where:

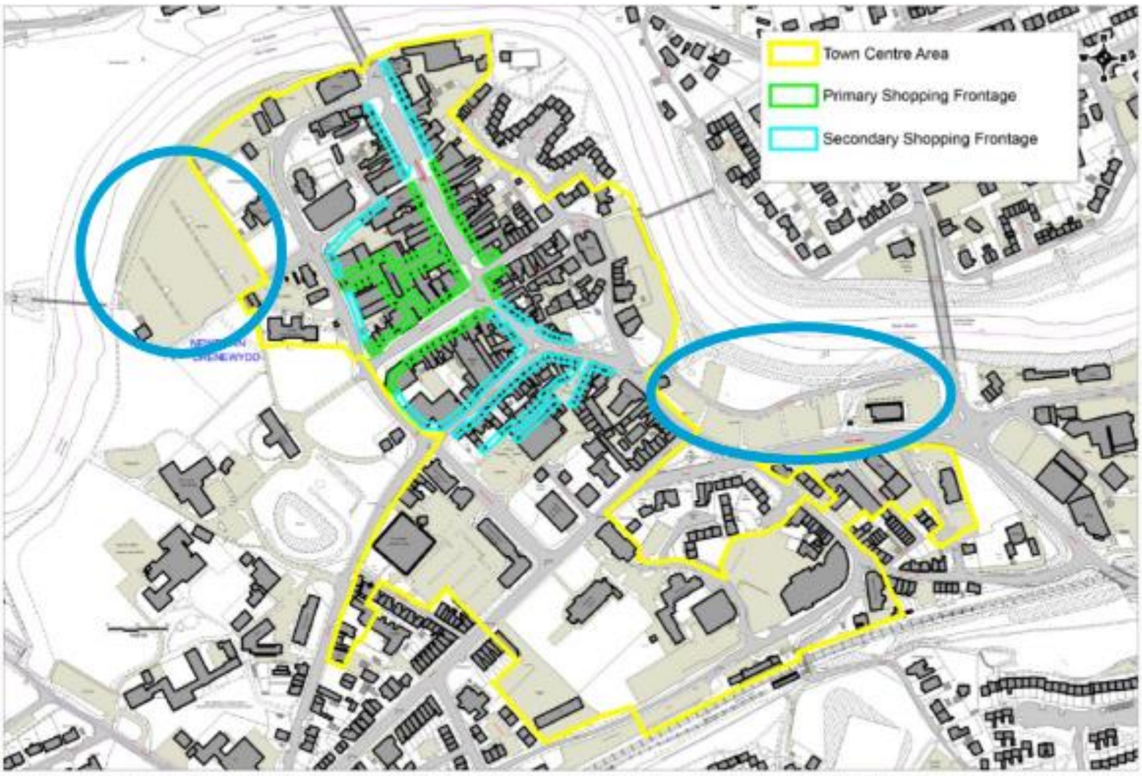
- They support the retail function of the centre and do not have a detrimental effect upon vitality or viability;
- It does not create a level of non-retail ground floor frontage detrimental to the retail character and function of the centre; and
- It does not create a level of non-active frontage during daylight trading hours. detrimental to the retail character and function of the centre.

5.9. It is also considered that the town centre boundaries (LDP **Appendix 7**) require revision. The suggested changes are explained in the RTCHHB report, and the recommendations are set out below.

5.10. In **Newtown** there are opportunities to extend the town centre boundary to accommodate potential new areas for future growth and regeneration, reflecting the recommendation to define the centre as a Sub Regional Centre. Options to extend include:

- Land between Heol Les Herbiers and New Road incorporating the public parking areas and fast food drive through (McDonalds) to the B4568 bridge; and
- Back Lane car park.

**Figure 7.1 Newtown potential amended town centre boundary**

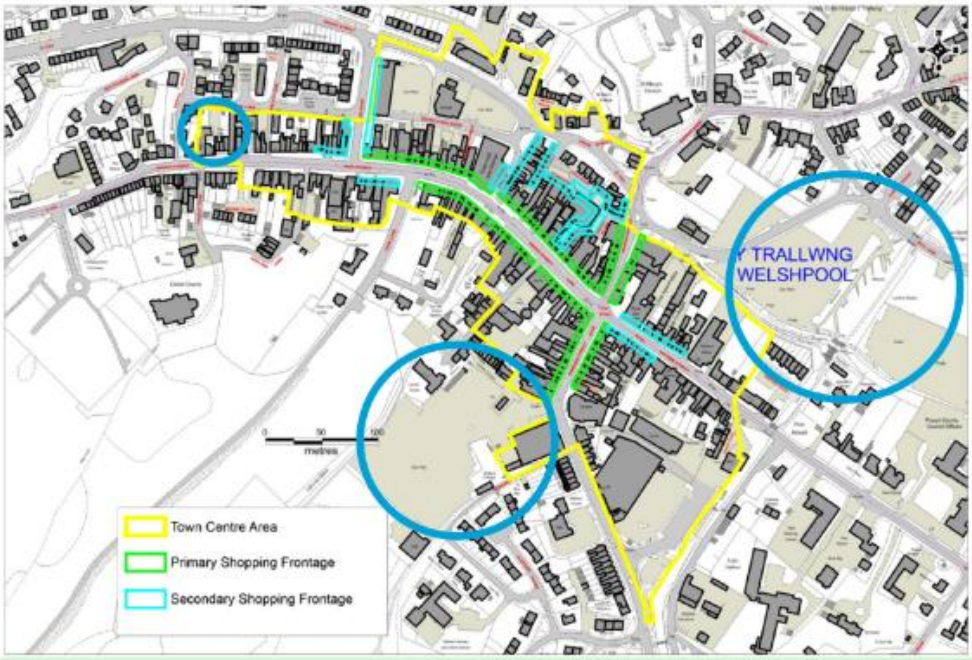





5.11. In **Welshpool** there are opportunities for potential changes to the town centre boundary in a number of locations, which include new facilities that are key footfall attractors in close proximity to the town centre and areas which could support future change and regeneration. Options include:

- Smithfield Road and Mill Lane which accommodates the Tesco supermarket, B&M and Aldi together with Church Street car parks and tourist Information centre;
- Old Station building, railway station car park and railway platforms (on the opposite side of the A483) which, whilst further separated and distanced to east/south east of the centre boundary could be considered if the boundary is extended to include Tesco;
- Berriew Street car park; and
- Western fringe of the boundary at Mount Street amended to take account of residential uses.

**Figure 7.2 Welshpool potential amended town centre boundary**

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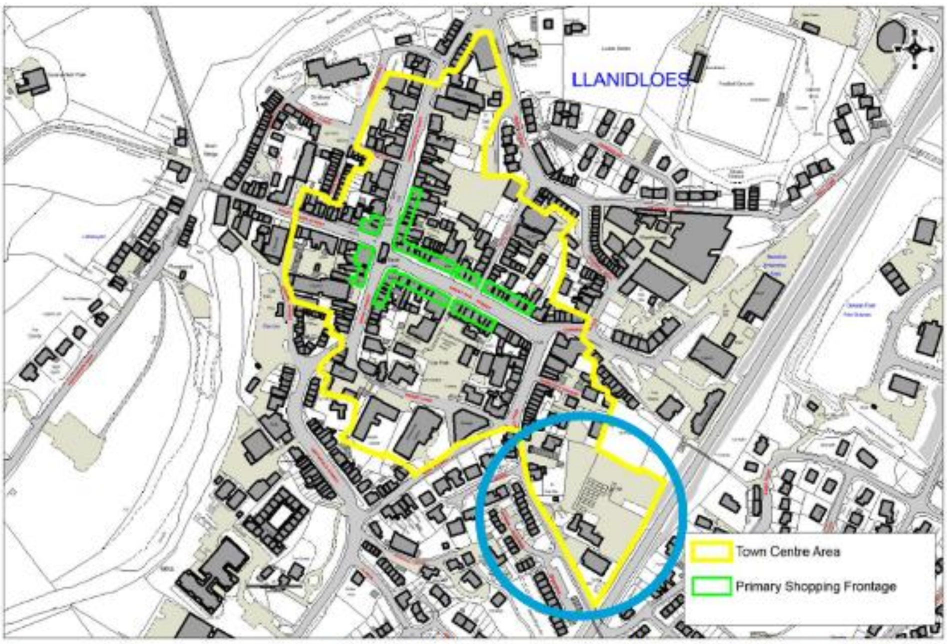
5.12. In **Llanidloes** opportunities to extend the town centre boundary are constrained by its location but scope exists to review the extent of the town centre boundary to take account of residential development activity at the former livestock market site at Gorn Road which has been developed for residential use.

**Figure 7.3 Llanidloes potential amended town centre boundary**

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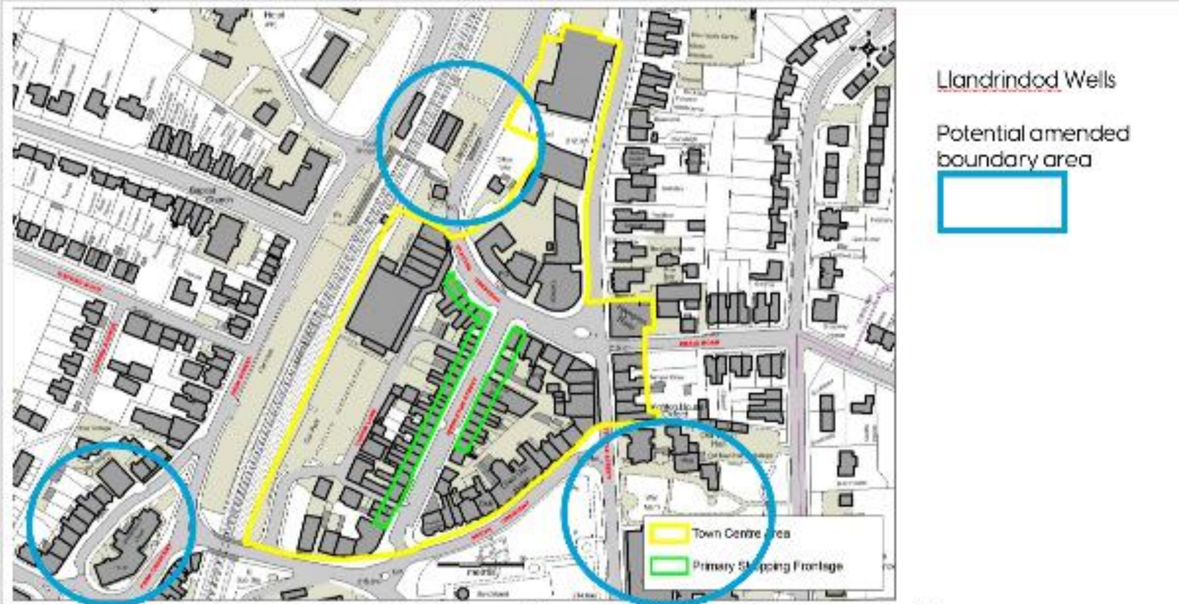
5.13. In **Llandrindod Wells** the Area Retail Centre status and compact boundaries provide significant scope for extending the town centre to reflect the multi-functional nature and wide range of the uses as well as allowing for future growth and regeneration. Options include extending the boundary to include:

- The railway station/bus Interchange and Station Crescent
- Museum, Metropole Hotel and car park
- The Crescent/High Street and Library

**Figure 7.4 Llandrindod Wells potential amended town centre boundary**

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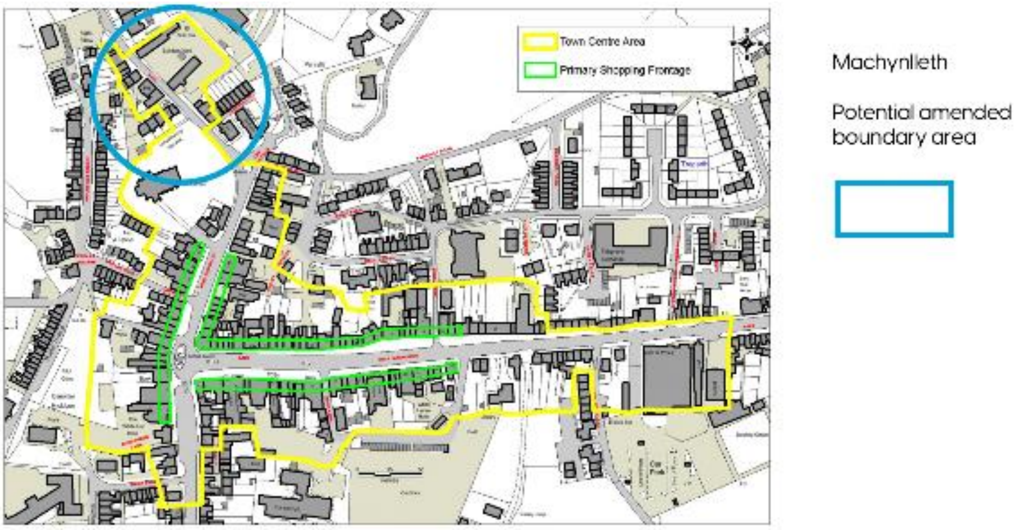
5.14. In **Machynlleth** there is limited scope to extend the town centre given the widely drawn linear nature of the defined centre. However, retaining Heol y Doll area within the centre would allow scope for future growth and regeneration of the Area Centre particularly where key brownfield opportunities exist.

**Figure 7.5 Machynlleth potential amended town centre boundary**

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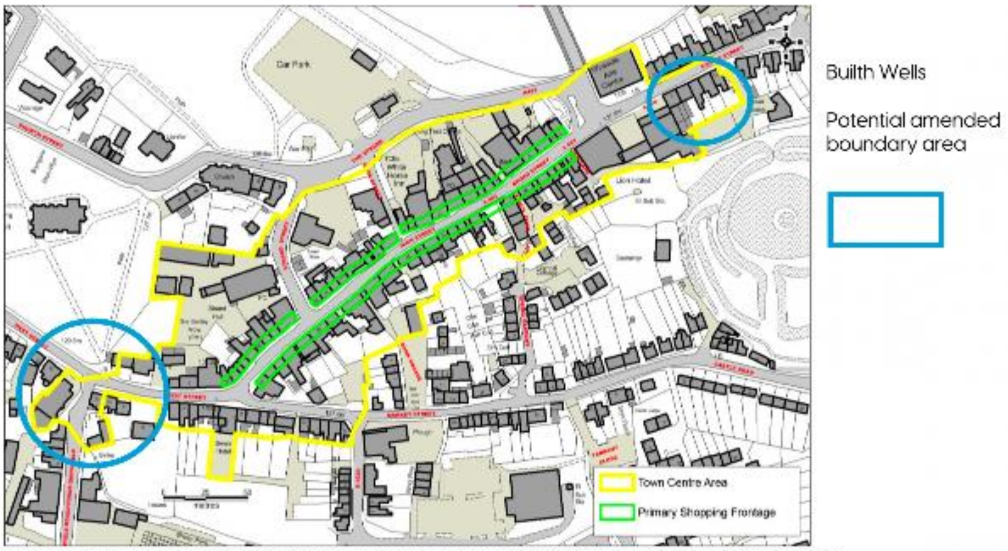
5.15. In **Builth Wells** it is recommended that the current boundary is retained to allow the town centre scope to grow and respond to the town centre first opportunities. There is limited potential to expand the boundary to consider the multi-functional nature of town centres, but options include:

- The Library and offices at Antur Gwy located on Park Road - although the area is significantly separated from the town centre by St Mary's Church; and
- Car park and former TIC building at The Gro although this area experiences high levels of flood risk and is constrained from development.

**Figure 7.6 Builth Wells potential amended town centre boundary**

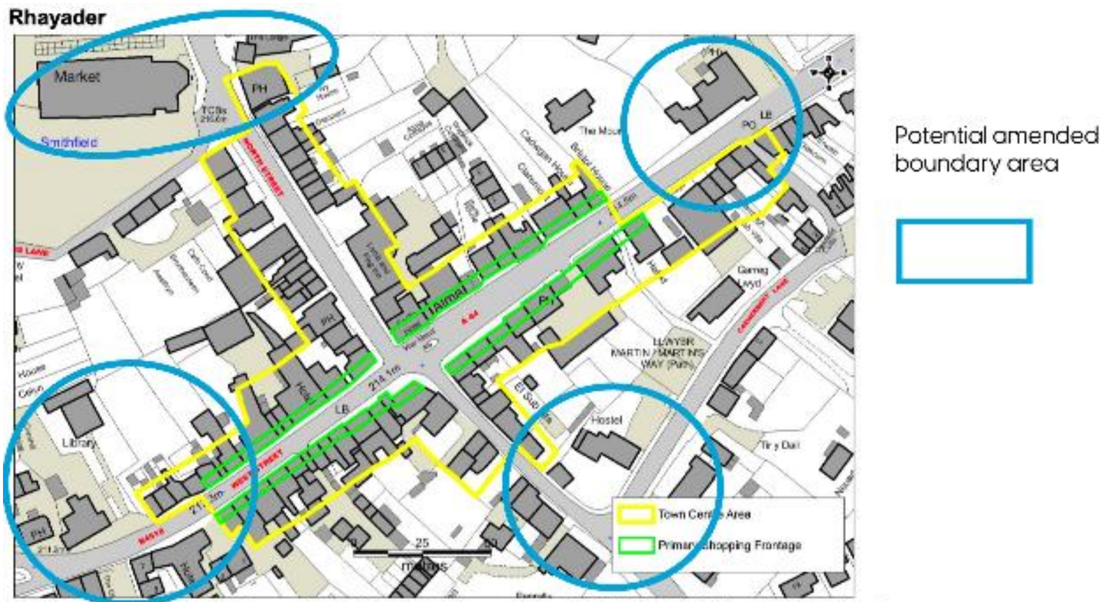





5.16. In **Rhayader** there is scope to expand the town centre boundary and include more businesses and facilities, particularly those directly adjacent the existing boundary, to take into account the multi-functional nature of the centre. An expanded town centre would showcase the centre's range of leisure businesses and facilities in particular. Options include the addition of the following:

- The leisure centre and cattle market, both of which are immediately adjacent to the existing northern boundary;
- The B&B, church, and doctor's surgery located on Caeherbert Lane and South Street;
- The Bear hotel on East Street; and
- The cluster of businesses to the west immediately adjacent the boundary including a hotel, public house, and bike shop as well as the town's library.

**Figure 7.7 Rhayader potential amended town centre boundary**

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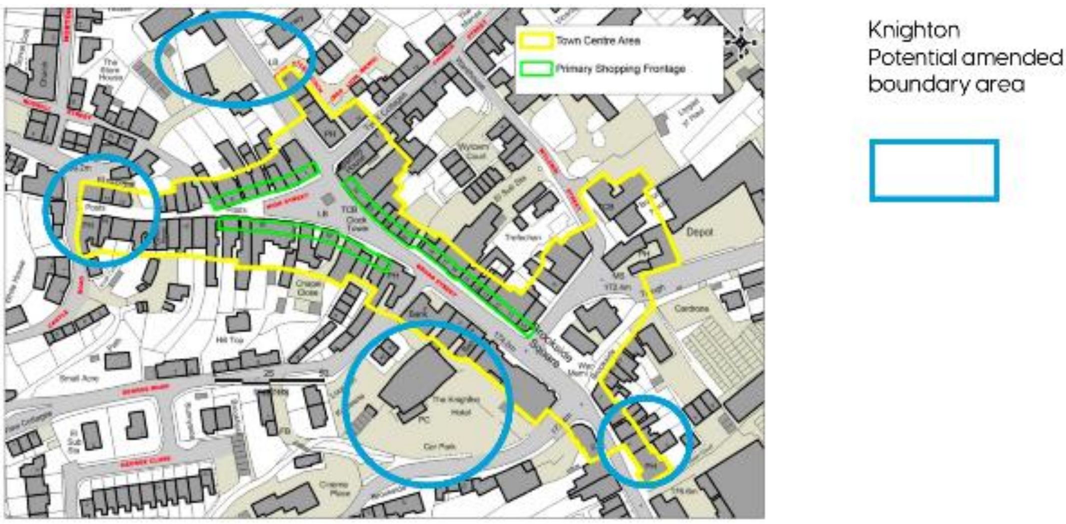
5.17. In **Knighton** the town centre commercial role diminishes on the edge of the centre and there are two areas that are mostly residential and no longer contribute to the functional commercial centre. There is therefore an opportunity to tighten the boundary by removing:

- The area of High Street between Russell Street and Castle Road; and
- Frontage along Bridge Street.

5.18. In addition, there are areas adjacent to the centre that contribute to the multifunctional nature of Knighton that could be added to the centre whilst maintaining the compactness of the town centre:

- Larkey Lane Car park and public toilets; and
- West Street/Victoria Road – Library Home Furniture and Market Garden.

**Figure 7.8 Knighton potential amended town centre boundary**

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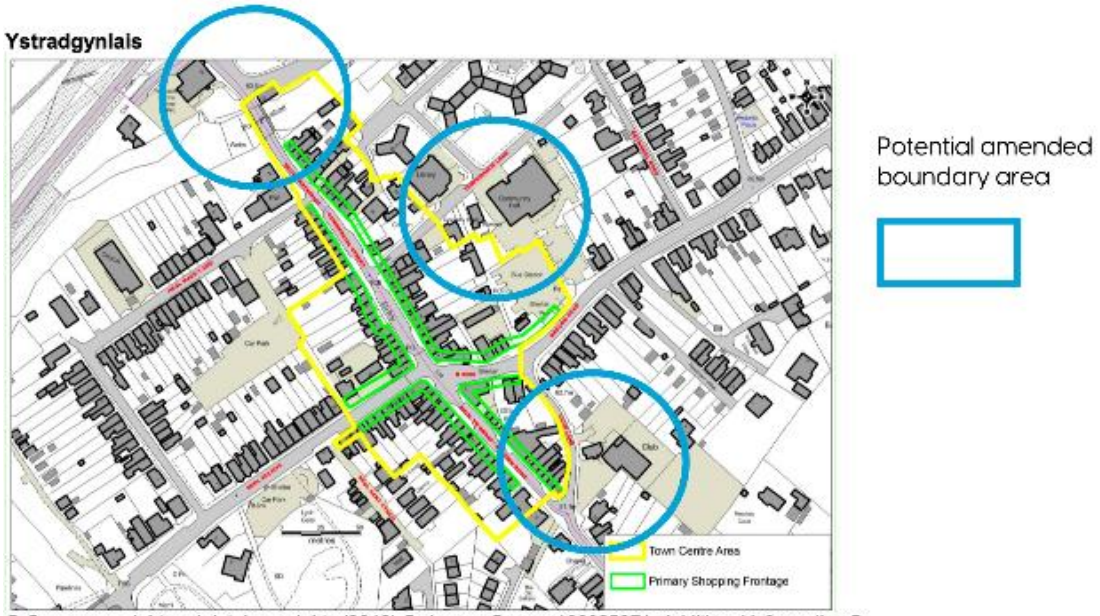
5.19. In **Ystradgynlais t**here is scope to expand the existing boundary to take into account the multifunctional nature of the centre, particularly its strong range of community and cultural facilities, and promote town centre regeneration through the incorporation of:

- The former Sardis Chapel, the Ynyscedwyn Arms and Penybont Inn to the north of the existing boundary;
- The library and The Welfare Hall located east of the existing boundary; and
- The Constitutional Club located by the southern boundary of the town centre.

**Figure 7.9 Ystradgynlais potential amended town centre boundary**

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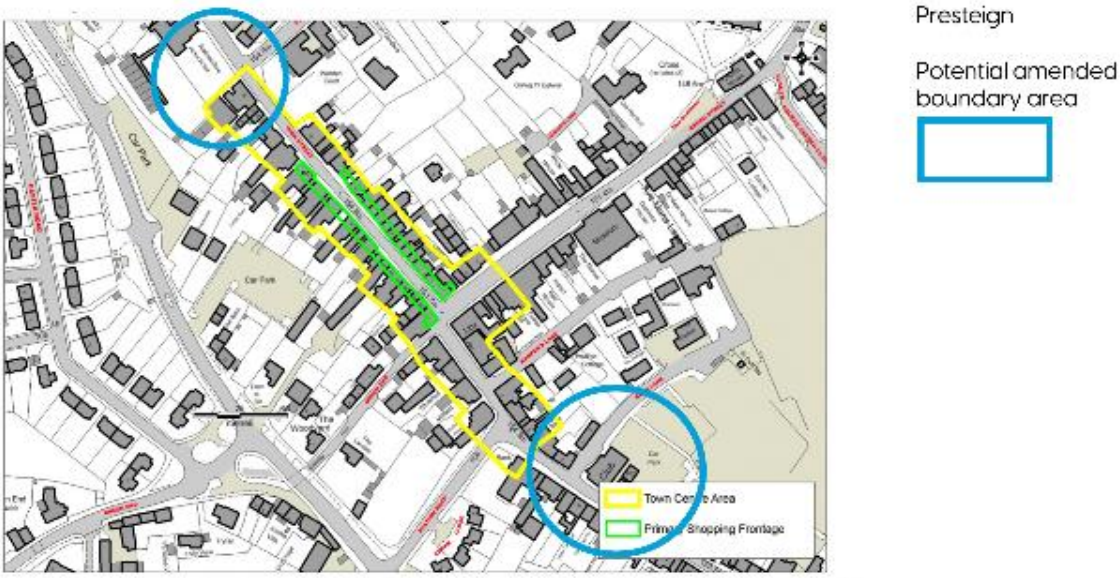
5.20. In **Presteigne** there are opportunities to extend the town centre boundary to include uses that contribute to the multifunctional nature and overall diversity of the centre. Options include:

- Hereford Street / Black Lane including The Royal British Legion, Car Park and Youth Centre; and
- High Street including Radnorshire Arms and the Cabin (takeaway).

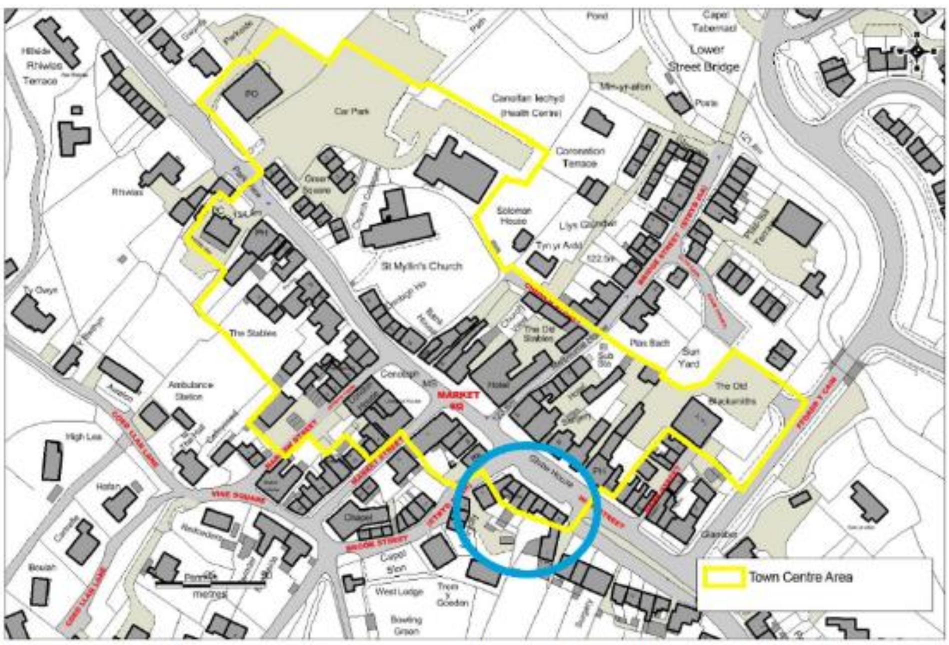
**Figure 7.10 Presteigne potential amended town centre boundary**






5.21. In **Llanfyllin** there is an opportunity to tighten the town centre boundary to remove the area of High Street to the south-east of Seeds restaurant as it is in residential use. The on street parking area should be retained in the town centre boundary.

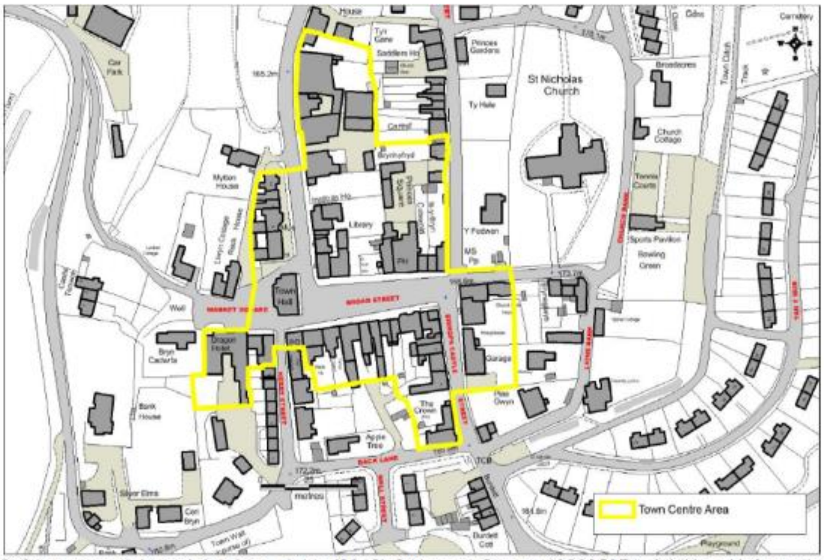
**Figure 7.11 Llanfyllin potential amended town centre boundary**






5.22. In **Montgomery** no change to the town centre boundary is recommended.

**Figure 7.12 Montgomery potential amended town centre boundary**

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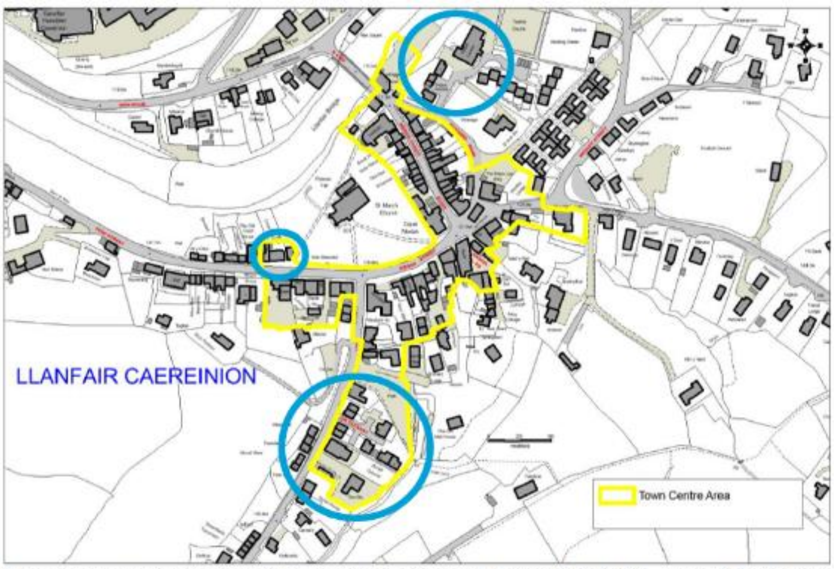
5.23. In **Llanfair Caereinion** there is scope to review the extent of the boundary to take account of the following:

- The health centre at Hafen Deg off Bridge Street could be included in an extended boundary;
- Land at Watergate Street to the south of the off-street parking area could be removed from the town centre boundary given its residential use; and
- A number of residential units on the northern side of High Street adjacent to the west entrance to St Mary's Church could be removed.

**Figure 7.13 Llanfair Caereinion potential amended town centre boundary**

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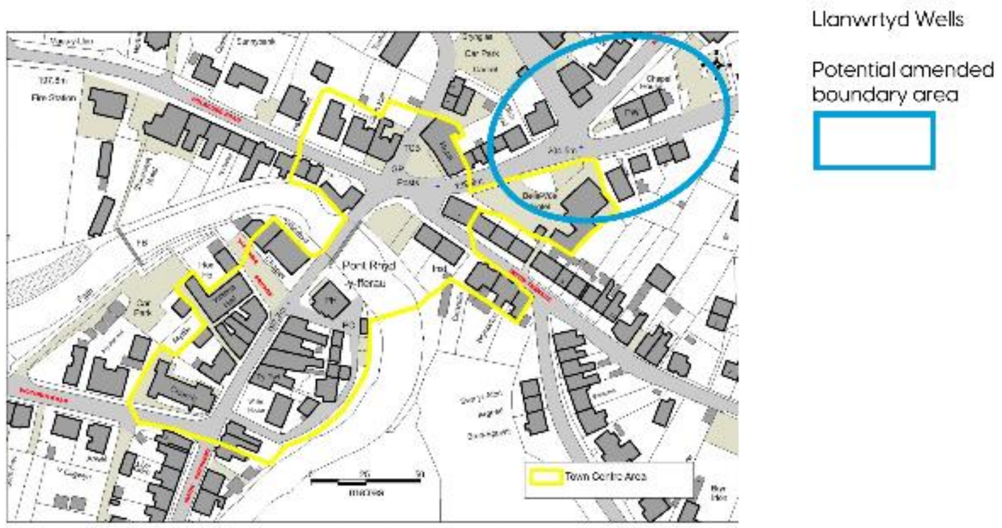
5.24. In **Llanwrtyd Wells** there is scope to extend the boundary to include the Heritage Centre, Garage with Post Office, Pharmacy and accommodation in Beulah Road.

**Figure 7.14 Llanwrtyd Wells potential amended town centre boundary**






## PPW Requirements

5.25. As outlined above, PPW sets out a number of requirements when reviewing retail and town centre planning policies. Compliance with these are considered below:

- Retail and commercial centres should be identified in development plans (para 4.3.2) - **COMPLIANT**;
- Development plans should provide a clear strategy for retail development, to include policies that will achieve vibrant, attractive and viable retail and commercial centres (para 4.3.4); These should be based on an understanding of the changing retail pressures affecting the centres and devise appropriate responses whether to growth or decline (para 4.3.6) - **COMPLIANT**;
- A hierarchy of retail and commercial centres should be established and boundaries for the centres should be shown on the Proposals Map (para 4.3.10). Centres should be categorised by their function, size, scale, form and location and a framework for their future roles should be set out (paras 4.3.11 & 4.3.12) - **COMPLIANT**;
- Policies should encourage a diversity of uses in a centre, recognising that this contributes to vibrancy and viability. Diversity can also reduce vacancy levels (para 4.3.36) – **IT MAY BE SENSIBLE FOR THE COUNCIL TO REVIEW WHERE REFERENCES TO RETAIL DEVELOPMENT AND USE ARE MADE AND CONSIDER WHETHER ANY OF THESE COULD APPROPRIATELY BE UPDATED TO REFER TO RETAIL AND/OR OTHER TOWN CENTRE USES**;
- Policies should identify which retail and commercial centres have primary and secondary shopping areas. These should be defined on the Proposals Map and the plan should include policies describing the types of uses that are likely to be acceptable in these areas - **COMPLIANT**;

- Mixed use developments should be encouraged where appropriate (para 4.3.34) - **AGAIN IT MAY BE SENSIBLE FOR THE COUNCIL TO REVIEW WHERE REFERENCES TO MIXED USE DEVELOPMENT MAY BE APPROPRIATE**;
- The health of centres should be monitored and changes made to the policies or boundaries if the right balance of use and activity is not being achieved (paras 4.3.35 – 4.3.36) - **COMPLIANT**;
- The development plan process should include an assessment of the need for additional retail development. This should include a consideration of quantitative and qualitative need (para 4.3.13) - **COMPLIANT**;
- Precedence should be given to establishing quantitative need before qualitative need is considered for both convenience and comparison floorspace (para 4.3.15) - **COMPLIANT**;
- Qualitative need may be an important consideration in certain circumstances where it supports the objectives of the local development plan or national planning policy. However, it is for the planning authority to determine and justify the weight given to any qualitative assessment (paras 4.3.15 – 4.3.17) - **COMPLIANT**;
- If a need is identified, the most appropriate form, scale, and location for provision should be considered (para 4.3.8), in accordance with the 'town centre first' policy (para 4.3.18) - **COMPLIANT**;
- The strategy and policies of the development plan should set out a framework for the authority's retail and commercial centres, taking into account the strategies of adjoining authorities to support a successful retailing sector (para 4.3.4) – **COMPLIANT**;
- Development plans should include criteria based policies against which retail proposals can be assessed, even if there is no identified need (para 4.3.9) – **THIS NEEDS TO BE INCORPORATED INTO THE RLDP POLICIES**;
- Development plans should also include policies to protect existing retail sites from inappropriate development, unless there is evidence that an existing retail site is no longer required (para 4.3.24) - **COMPLIANT**;
- Policies and supplementary planning guidance should support the management of retail and commercial centres (para 4.3.39) - **THIS NEEDS TO BE INCORPORATED INTO THE RLDP POLICIES**; and
- Residential uses should be encouraged where appropriate (para 4.3.7) – **A MORE POSITIVELY WORDED POLICY MAY BE REQUIRED TO ADDRESS THIS**.

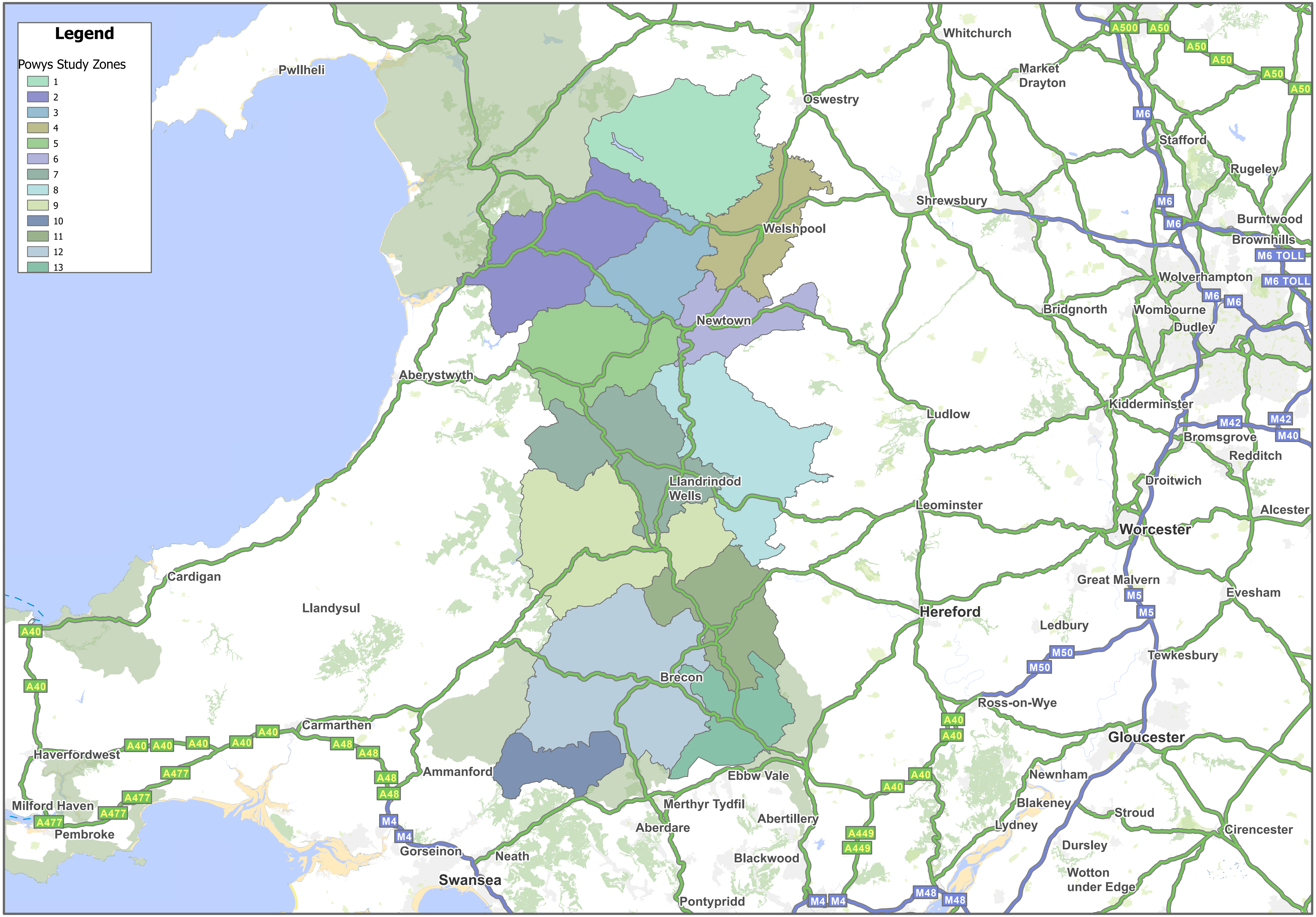
## Other Considerations regarding Policy

5.26. ODC and RRPC have also considered whether there are any Powys or centre specific matters which would be assisted by policy support. It is suggested that the following could be considered:

- A policy supporting mixed use redevelopment within the town centres, subject to the replacement of any existing retail and leisure floorspace in an appropriate format that retains active frontages during daylight hours and supports and enhances the vitality and viability of the centre as a whole.

# Powys Retail Need Assessment

## Appendix 1


Legend
Powys Study Zones
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12
13
Pwllheli
Oswestry
Whitchurch
Market Drayton
Stafford
Rugeley
Shrewsbury
Welshpool
Burntwood
Brownhills
Wolverhampton
Newtown
Bridgnorth
Wombourne
Dudley
Aberystwyth
Ludlow
Kidderminster
Bromsgrove
Redditch
Llandrindod Wells
Droitwich
Leominster
Alcester
Worcester
Cardigan
Great Malvern
Evesham
Llandysul
Hereford
Ledbury
Tewkesbury
Brecon
Ross-on-Wye
Carmarthen
Gloucester
Haverfordwest
Ammanford
Ebbw Vale
Newnham
Milford Haven
Merthyr Tydfil
Blakeney
Stroud
Pembroke
Abertillery
Lydney
Aberdare
Cirencester
Gorseinon
Neath
Dursley
Blackwood
Swansea
Wotton under Edge
Pontypridd
A500
A50
M6
M6 TOLL
M42
M40
M5
M50
A40
A48
A477
M4
A449
M48


Llanfyllin
Llanfyllin
Y Trallwng a Trefaldwyn
Welshpool and Montgomery
Machynlleth
Machynlleth
Llanfair Caereinion
Llanfair Caereinion
Y Drenewydd
Newtown
Llanidloes
Llanidloes
Llandrindod a Rhaeadr Gwy
Llandrindod and Rhayader
Tref-y-Clawdd a Llanandras
Knighton and Presteigne
Llanfair-yn-Mullat a Llanwrtyd
Builth and Llanwrtyd
Y Gelli Gandryll a Thalgarth
Hay and Talgarth
Aberhonddu
Brecon
Crughywel
Crickhowell
Ystradgynlais
Ystradgynlais

# Powys Retail Capacity Assessment – Quantitative Need Tables

**Table 4.1: Study Area Zones- County of Powys (including areas within Brecon Beacons National Park (BBNP)**

| Zone | Locality Name | Middle Super Output Area Name | Middle Super Output Area | Comments |
|---|---|---|---|---|
| 1 | Llanfyllin | Powys 001 | W02000097 | |
| 2 | Machynlleth | Powys 004 | W02000100 | |
| 3 | Llanfair Caereinion | Powys 006 | W02000102 | |
| 4 | Welshpool and Montgomery | Powys 002 | W02000098 | |
| | | Powys 003 | W02000099 | |
| | | Powys 005 | W02000101 | |
| 5 | Llanidloes | Powys 010 | W02000106 | |
| 6 | Newtown | Powys 007 | W02000103 | |
| | | Powys 008 | W02000104 | |
| | | Powys 009 | W02000105 | |
| 7 | Llandrindod and Rhayader | Powys 012 | W02000108 | |
| | | Powys 013 | W02000109 | |
| 8 | Knighton and Presteigne | Powys 011 | W02000107 | |
| 9 | Builth and Llanwrtyd | Powys 014 | W02000110 | |
| 10 | Ystradgynlais | Powys 021 | W02000416 | |
| 11 | Hay and Talgarth | Powys 015 | W02000111 | Partially in BBNP |
| 12 | Brecon | Powys 020 | W02000414 | Partially in BBNP |
| | | Powys 017 | W02000113 | Entirely within BBNP |
| 13 | Crickhowell | Powys 018 | W02000114 | Mostly in BBNP |

**Table 4.2: Population by Zone**

| Population | Zone 1 | Zone 2 | Zone 3 | Zone 4 | Zone 5 | Zone 6 | Zone 7 | Zone 8 | Zone 9 | Zone 10 | Zone 11 | Zone 12 | Zone 13 | Total |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Llanfyllin | Machynlleth | Llanfair Caereinion | Welshpool & Montgomery | Llanidloes | Newtown | Llandrindod & Rhayader | Knighton & Presteigne | Builth & Llanwrtyd | Ystradgynlais | Hay & Talgarth | Brecon | Crickhowell | |
| 2011 Census | 9,114 | 6,206 | 6,306 | 18,448 | 6,628 | 17,077 | 12,371 | 9,945 | 7,035 | 10,210 | 8,340 | 14,264 | 6,942 | 132,886 |
| 2021 | 9,166 | 6,414 | 6,394 | 18,714 | 6,768 | 17,356 | 12,811 | 10,143 | 7,093 | 10,345 | 8,703 | 14,461 | 7,257 | 135,625 |
| 2023 | 9,162 | 6,375 | 6,382 | 18,651 | 6,712 | 17,244 | 12,746 | 10,135 | 7,081 | 10,267 | 8,764 | 14,425 | 7,199 | 135,143 |
| 2025 | 9,200 | 6,372 | 6,408 | 18,680 | 6,698 | 17,287 | 12,697 | 10,116 | 7,090 | 10,272 | 8,798 | 14,460 | 7,181 | 135,259 |
| 2030 | 9,238 | 6,383 | 6,459 | 18,670 | 6,693 | 17,362 | 12,600 | 10,064 | 7,128 | 10,282 | 8,830 | 14,533 | 7,215 | 135,457 |
| 2035 | 9,282 | 6,406 | 6,529 | 18,695 | 6,700 | 17,449 | 12,537 | 10,020 | 7,167 | 10,288 | 8,847 | 14,648 | 7,201 | 135,769 |
| 2037 | 9,308 | 6,434 | 6,554 | 18,711 | 6,694 | 17,499 | 12,516 | 10,002 | 7,191 | 10,284 | 8,850 | 14,684 | 7,188 | 135,915 |

*Notes*

*2011 Population from Census*

*2018 Population estimates and 2022 - 2037 projections from Experian*

**Table 4.3: Convenience Expenditure per Head 2021 - 2037 (2021 prices)**

| Convenience Expenditure per Head (£) (2021 prices) | Zone 1 | Zone 2 | Zone 3 | Zone 4 | Zone 5 | Zone 6 | Zone 7 | Zone 8 | Zone 9 | Zone 10 | Zone 11 | Zone 12 | Zone 13 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Llanfyllin | Machynlleth | Llanfair Caereinion | Welshpool & Montgomery | Llanidloes | Newtown | Llandrindod & Rhayader | Knighton & Presteigne | Builth & Llanwrtyd | Ystradgynlais | Hay & Talgarth | Brecon | Crickhowell |
| 2021 | £2,924 | £2,883 | £2,805 | £2,774 | £2,902 | £2,623 | £2,911 | £2,956 | £2,795 | £2,698 | £2,991 | £2,841 | £3,070 |
| 2021 exc SFT | £2,754 | £2,716 | £2,642 | £2,613 | £2,734 | £2,471 | £2,742 | £2,785 | £2,633 | £2,542 | £2,818 | £2,676 | £2,892 |
| 2023 exc SFT | £2,511 | £2,475 | £2,408 | £2,382 | £2,492 | £2,252 | £2,499 | £2,538 | £2,400 | £2,317 | £2,568 | £2,439 | £2,636 |
| 2025 exc SFT | £2,486 | £2,451 | £2,384 | £2,358 | £2,467 | £2,230 | £2,475 | £2,513 | £2,376 | £2,293 | £2,543 | £2,415 | £2,610 |
| 2030 exc SFT | £2,476 | £2,441 | £2,375 | £2,349 | £2,457 | £2,221 | £2,465 | £2,503 | £2,366 | £2,284 | £2,532 | £2,405 | £2,599 |
| 2035 exc SFT | £2,483 | £2,448 | £2,382 | £2,356 | £2,464 | £2,227 | £2,472 | £2,510 | £2,374 | £2,291 | £2,540 | £2,413 | £2,607 |
| 2037 exc SFT | £2,488 | £2,453 | £2,387 | £2,360 | £2,469 | £2,232 | £2,477 | £2,515 | £2,378 | £2,296 | £2,545 | £2,417 | £2,612 |

*Notes*

*2021 Convenience Expenditure from Experian*

*2021 Convenience expenditure exc SFT allows for SFT at 5.8% (Experian Retail Planner Briefing Note 20, Figure 5)*

*2023 - 2037 Projected expenditure based on expected change in spend (Experian Retail Planner Briefing Note 20, Figure 7)*

Table 4.4: Comparison Expenditure per Head 2021 - 2037 (2021 prices)

| Comparison Expenditure per Head (£) (2021 prices) | Zone 1 | Zone 2 | Zone 3 | Zone 4 | Zone 5 | Zone 6 | Zone 7 | Zone 8 | Zone 9 | Zone 10 | Zone 11 | Zone 12 | Zone 13 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Llanfyllin | Machynlleth | Llanfair Caereinion | Welshpool & Montgomery | Llanidloes | Newtown | Llandrindod & Rhayader | Knighton & Presteigne | Builth & Llanwrtyd | Ystradgynlais | Hay & Talgarth | Brecon | Crickhowell |
| 2021 | £4,224 | £3,918 | £3,975 | £3,905 | £4,093 | £3,632 | £3,560 | £4,133 | £3,570 | £3,559 | £4,218 | £4,191 | £4,495 |
| 2021 exc SFT | £3,012 | £2,794 | £2,834 | £2,784 | £2,918 | £2,590 | £2,538 | £2,947 | £2,545 | £2,538 | £3,007 | £2,988 | £3,205 |
| 2023 exc SFT | £3,041 | £2,821 | £2,862 | £2,812 | £2,947 | £2,615 | £2,563 | £2,976 | £2,570 | £2,562 | £3,037 | £3,017 | £3,236 |
| 2025 exc SFT | £3,026 | £2,807 | £2,848 | £2,797 | £2,932 | £2,602 | £2,550 | £2,961 | £2,557 | £2,550 | £3,022 | £3,002 | £3,220 |
| 2030 exc SFT | £3,530 | £3,274 | £3,322 | £3,264 | £3,421 | £3,035 | £2,975 | £3,454 | £2,984 | £2,974 | £3,525 | £3,503 | £3,757 |
| 2035 exc SFT | £4,033 | £3,741 | £3,795 | £3,729 | £3,908 | £3,468 | £3,399 | £3,946 | £3,409 | £3,398 | £4,027 | £4,002 | £4,292 |
| 2037 exc SFT | £4,262 | £3,953 | £4,011 | £3,940 | £4,130 | £3,665 | £3,592 | £4,170 | £3,602 | £3,591 | £4,256 | £4,229 | £4,536 |

*Notes*

*2021 Comparison Expenditure from Experian*

*2021 Comparison expenditure exc SFT allows for SFT at 28.7% (Experian Retail Planner Briefing Note 20, Figure 5)*

*2023 - 2037 Projected expenditure based on expected change in spend (Experian Retail Planner Briefing Note 20, Figure 7)*

**Table 4.5: Total Available Convenience Expenditure 2021 - 2037 excluding SFT (2021 prices)**

| Convenience Expenditure per Head (£m) (2021 prices) | Zone 1 | Zone 2 | Zone 3 | Zone 4 | Zone 5 | Zone 6 | Zone 7 | Zone 8 | Zone 9 | Zone 10 | Zone 11 | Zone 12 | Zone 13 | Total (£m) | Change in Expenditure from 2021 (£m) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Llanfyllin | Machynlleth | Llanfair Caereinion | Welshpool & Montgomery | Llanidloes | Newtown | Llandrindod & Rhayader | Knighton & Presteigne | Builth & Llanwrtyd | Ystradgynlais | Hay & Talgarth | Brecon | Crickhowell | | |
| 2021 | £26.80 | £18.49 | £17.94 | £51.91 | £19.64 | £45.52 | £37.29 | £29.98 | £19.82 | £27.91 | £26.03 | £41.08 | £22.28 | £384.71 | |
| 2021 exc SFT | £25.25 | £17.42 | £16.89 | £48.90 | £18.50 | £42.88 | £35.13 | £28.24 | £18.68 | £26.29 | £24.52 | £38.70 | £20.99 | £362.40 | |
| 2023 exc SFT | £23.00 | £15.78 | £15.37 | £44.42 | £16.72 | £38.84 | £31.86 | £25.72 | £16.99 | £23.78 | £22.51 | £35.19 | £18.98 | £329.17 | -£33.23 |
| 2025 exc SFT | £22.87 | £15.62 | £15.28 | £44.05 | £16.52 | £38.54 | £31.42 | £25.42 | £16.85 | £23.56 | £22.37 | £34.92 | £18.74 | £326.15 | -£36.25 |
| 2030 exc SFT | £22.87 | £15.58 | £15.34 | £43.85 | £16.44 | £38.56 | £31.05 | £25.19 | £16.87 | £23.49 | £22.36 | £34.96 | £18.75 | £325.31 | -£37.09 |
| 2035 exc SFT | £23.05 | £15.68 | £15.55 | £44.04 | £16.51 | £38.87 | £30.99 | £25.15 | £17.01 | £23.57 | £22.47 | £35.34 | £18.77 | £327.01 | -£35.38 |
| 2037 exc SFT | £23.16 | £15.78 | £15.64 | £44.17 | £16.53 | £39.06 | £31.00 | £25.16 | £17.10 | £23.61 | £22.52 | £35.50 | £18.78 | £328.01 | -£34.39 |

**Table 4.6: Total Available Comparison Expenditure 2021 - 2037 excluding SFT (2021 prices)**

| Comparison Expenditure per Head (£m) (2021 prices) | Zone 1 | Zone 2 | Zone 3 | Zone 4 | Zone 5 | Zone 6 | Zone 7 | Zone 8 | Zone 9 | Zone 10 | Zone 11 | Zone 12 | Zone 13 | Total (£m) | Change in Expenditure from 2021 (£m) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | Llanfyllin | Machynlleth | Llanfair Caereinion | Welshpool & Montgomery | Llanidloes | Newtown | Llandrindod & Rhayader | Knighton & Presteigne | Builth & Llanwrtyd | Ystradgynlais | Hay & Talgarth | Brecon | Crickhowell | | |
| 2021 | £38.72 | £25.13 | £25.42 | £73.08 | £27.70 | £63.04 | £45.61 | £41.92 | £25.32 | £36.82 | £36.71 | £60.61 | £32.62 | £532.68 | |
| 2021 exc SFT | £27.61 | £17.92 | £18.12 | £52.10 | £19.75 | £44.95 | £32.52 | £29.89 | £18.05 | £26.25 | £26.17 | £43.21 | £23.26 | £379.80 | |
| 2023 exc SFT | £27.86 | £17.98 | £18.26 | £52.44 | £19.78 | £45.09 | £32.67 | £30.16 | £18.20 | £26.31 | £26.62 | £43.53 | £23.30 | £382.20 | £2.40 |
| 2025 exc SFT | £27.84 | £17.88 | £18.25 | £52.26 | £19.64 | £44.98 | £32.38 | £29.95 | £18.13 | £26.19 | £26.58 | £43.41 | £23.12 | £380.62 | £0.82 |
| 2030 exc SFT | £32.61 | £20.90 | £21.46 | £60.93 | £22.89 | £52.70 | £37.49 | £34.76 | £21.27 | £30.58 | £31.13 | £50.90 | £27.10 | £444.72 | £64.92 |
| 2035 exc SFT | £37.44 | £23.96 | £24.78 | £69.70 | £26.18 | £60.51 | £42.61 | £39.54 | £24.43 | £34.96 | £35.63 | £58.62 | £30.91 | £509.28 | £129.47 |
| 2037 exc SFT | £39.67 | £25.44 | £26.29 | £73.73 | £27.65 | £64.13 | £44.96 | £41.71 | £25.90 | £36.93 | £37.67 | £62.10 | £32.60 | £538.77 | £158.96 |

*Notes*

*From Tables 4.2 and 4.4*

**Table 4.7: Convenience Capacity - Powys (Base excluding Commitments**

| | | 2021 | 2023 | 2025 | 2030 | 2035 |
|---|---|---|---|---|---|---|
| Total Available Convenience Expenditure in Study Area (£m) | (a) | £362.40 | £329.17 | £326.15 | £325.31 | £327.01 |
| Current Market share of Convenience destinations in study area | (b) | 70.8% | 70.8% | 70.8% | 70.8% | 70.8% |
| Available Convenience Expenditure for destinations in study area | (c) | £256.40 | £232.89 | £230.75 | £230.16 | £231.36 |
| *Change in available spend to study area destinations (cumulative from 2021)* | *(d)* | | *-£23.51* | *-£25.64* | *-£26.24* | *-£25.03* |
| Turnover of Convenience destinations (assuming no change in provision or sales efficiences) | (e) | £256.40 | £256.40 | £256.40 | £256.40 | £256.40 |
| Turnover of Convenience destinations (allowing for changes in sales efficiences) | (f) | £256.40 | £232.39 | £232.16 | £234.96 | £239.70 |
| **Residual Convenience spend to support new convenience floorspace (cumulative) (£m)** | **(g)** | | £0.49 | -£1.41 | -£4.80 | -£8.33 |
| Benchmark Sales density for Convenience Floorspace (£ per sqm) | (h) | | £9,553 | £9,575 | £9,824 | £9,824 |
| **Amount of new convenience floorspace required (cumulative) (sqm net)** | **(j)** | | **52** | **-147** | **-489** | **-848** |

*Notes*

*(a) From Table 3*

*(b) Calculated from NLP Retail Study (Tables 3B & 13B)*

*(c) (a) x (b)*

*(d) Calculated from (c)*

*(e) Based on (b)*

*(f) Calculated from (e) using forecast changes in sales efficiences from Experian Retail Planner Briefing Note 20, Figure 3a*

*(g) From (c) -(f)*

*(h) From Experian Retail Planner Briefing Note 20, Figure 3a*

*(i) Calculated from (g) and (h)*

**Table 4.8: Comparison Capacity - Powys (Base excluding Commitments)**

| | | 2021 | 2023 | 2025 | 2030 | 2035 |
|---|---|---|---|---|---|---|
| Total Available Comparison Expenditure in Study Area | (a) | £379.80 | £382.20 | £380.62 | £444.72 | £509.28 |
| Current Market share of Comparison destinations in study area | (b) | 33.3% | 33.3% | 33.3% | 33.3% | 33.3% |
| Available Comparison Expenditure for destinations in study area | (c) | £126.47 | £127.27 | £126.75 | £148.09 | £169.59 |
| *Change in available spend to study area destinations (cumulative)* | *(d)* | | *£0.80* | *£0.27* | *£21.62* | *£43.11* |
| Turnover of Comparison destinations (assuming no change in provision or sales efficiences) | (e) | £126.47 | £126.47 | £126.47 | £126.47 | £126.47 |
| Turnover of Comparison destinations (allowing for changes in sales efficiences) | (f) | £126.47 | £130.12 | £132.32 | £148.11 | £171.70 |
| **Residual Comparison spend to support new comparison floorspace (cumulative)** | **(g)** | | -£2.85 | -£5.58 | -£0.01 | -£2.11 |
| Benchmark Sales density for Comparison Floorspace (£ per sqm) | (h) | | £4,444 | £4,675 | £5,893 | £5,893 |
| **Amount of new comparison floorspace required (cumulative) (sqm net)** | **(i)** | | **-641** | **-1193** | **-2** | **-357** |

*Notes*

*(a) From Table 5*

*(b) Calculated from NLP Retail Study (Table 6C)*

*(c) (a) x (b)*

*(d) Calculated from (c)*

*(e) Based on (b)*

*(f) Calculated from (e) using forecast changes in sales efficiences from Experian Retail Planner Briefing Note 20, Figure 3a*

*(g) From (c) -(f)*

*(h) From Experian Retail Planner Briefing Note 20, Figure 3b*

*(i) Calculated from (g) and (h)*