



Ipswich Borough Council

Retail Position Update Statement

August 2019



WYG, 90 Victoria Street, Bristol, BS1 6DP
Tel: +44 (0)117 9254393
Email: bristol.planning@wyg.com www.wyg.com



Contents

1.0 Introduction	1
1.1 Introduction	1
1.2 The Brief.....	1
1.3 Structure of Statement	2
2.0 Update on Current/Future Retail Trends	3
2.1 Introduction	3
2.2 Update on Current/Future Retail Trends.....	3
2.3 Government’s Response to ‘Transform Town Centres’	9
2.4 Summary	11
3.0 Updated Quantitative Retail Need Assessment	12
3.1 Introduction	12
3.2 Comparison Goods Capacity	12
3.3 Convenience Goods Capacity	15
3.4 Summary	17
4.0 Town Centre Retail Composition, Requirements and Vacancy Level Update	19
4.1 Introduction	19
4.2 Update on Ipswich Town Centre Convenience & Comparison Goods Retail Composition	19
4.3 Update of Ipswich Town Centre Registered Convenience & Comparison Goods Retailer Requirements	22
4.4 Changes in Vacancy Levels in Ipswich Town Centre	23
4.5 Summary	25
5.0 Conclusions/Recommendation	26
5.1 Introduction	26
5.2 Summary of Updated Retail Floorspace Capacity.....	26
5.3 Capacity of Upcoming Local Plan Review Sites	27
5.4 Can Upcoming Local Plan Review Sites meet identified Quantitative Convenience Goods Retail Floorspace Capacity?	27
5.5 Can Upcoming Local Plan Review Sites meet identified Quantitative Comparison Goods Retail Floorspace Capacity?	28
5.6 Overall Conclusions.....	28

Appendices

- Appendix A: Statistical Retail Tables - Population and Expenditure
- Appendix B: Statistical Retail Tables - Comparison Goods Capacity
- Appendix C: Statistical Retail Tables - Convenience Goods Capacity
- Appendix D: Experian Goad Land Use Plan - Ipswich Town Centre (October 2018)
- Appendix E: Ipswich Town Centre Vacancy Plans

1.0 Introduction

1.1 Introduction

- 1.1.1 WYG Planning ('WYG') have been commissioned by Ipswich Borough Council (the Council) to provide a Retail Position Update Statement for the Council. The Statement represents an addendum to the October 2017 Retail and Commercial Leisure Town Centre Study and should be read alongside the 2017 Study.
- 1.1.2 This Update Statement together with the 2017 Study will be used to inform the Council's emerging Local Plan Review. The authority is embarking upon the production of an aligned Local Plan Review covering the period 2016-2036, alongside neighbouring Suffolk Coastal (now part of East Suffolk Council), Babergh and Mid Suffolk District Councils.

1.2 The Brief

- 1.2.1 In accordance with the Council's brief this Statement covers the following matters:
- (1) An updated convenience & comparison goods retail quantitative capacity for Ipswich Borough taking into account:
 - Updated per capita retail expenditure figures published by retail data provider Experian (Retail Planner Briefing Note 16 (December 2018)).
 - Updated retail expenditure growth and Special Forms of Trading (internet) projections published by retail data provider Experian (Retail Planner Briefing Note 16 (December 2018)).
 - Any new or expired retail planning permissions/commitments since the original 2017 Study.
 - (2) An updated qualitative retail assessment of the following:
 - An update on current/future retail trends that are impacting/may impact Ipswich and national changes in town centres.
 - A retail composition and vacancy level update of Ipswich Town Centre (looking at any change in retail composition using Experian Goad data).
 - An update on any changes in published demand from retailers for presence in the town centre since the original Retail Study using 'The Requirements List'.
 - (3) Conclusions and Recommendations taking into account:
 - How much retail capacity could be absorbed by sites identified for retail in upcoming Local Plan Review.

-
- In the potential absence of in-centre, edge of centre and out-of-centre sites (which are accessible to the town centre) what strategy the Council should consider in terms of seeking to meet any potential remaining retail capacity.

1.2.2 Where not updated by this statement/addendum, the findings and recommendations set out in the original 2017 Retail and Commercial Leisure Study remain applicable.

1.3 Structure of Statement

1.3.1 This statement is structured as follows:

- Section 2 provides an update on current future/retail trends that are impacting/may impact Ipswich Town Centre and summarises the Governments response to assist town centres;
- Section 3 sets out the updated quantitative retail capacity assessment;
- Section 4 provides an update on the retail composition and vacancy levels in the town centre and demand from retailers; and
- Section 5 sets out our conclusions and recommendations assessing whether sites identified in the upcoming Local Plan Review could accommodate the identified updated quantitative retail capacity.

2.0 Update on Current/Future Retail Trends

2.1 Introduction

2.1.1 This section of the statement provides an update on the key current/future retail trends which could potentially impact Ipswich Town Centre together with a summary of the Government's response to 'transform town centres'.

2.2 Update on Current/Future Retail Trends

2.2.1 2018 was a challenging year for retailers. Deloitte report that it was the year that saw the most store closures and job losses since the 2008 global recession. The retail industry is one which is under pressure with many retailers finding themselves in an uncomfortable position as margins are squeezed between weakening demand and rising costs. We summarise below the key issues impacting many retailers and town centres in the UK:

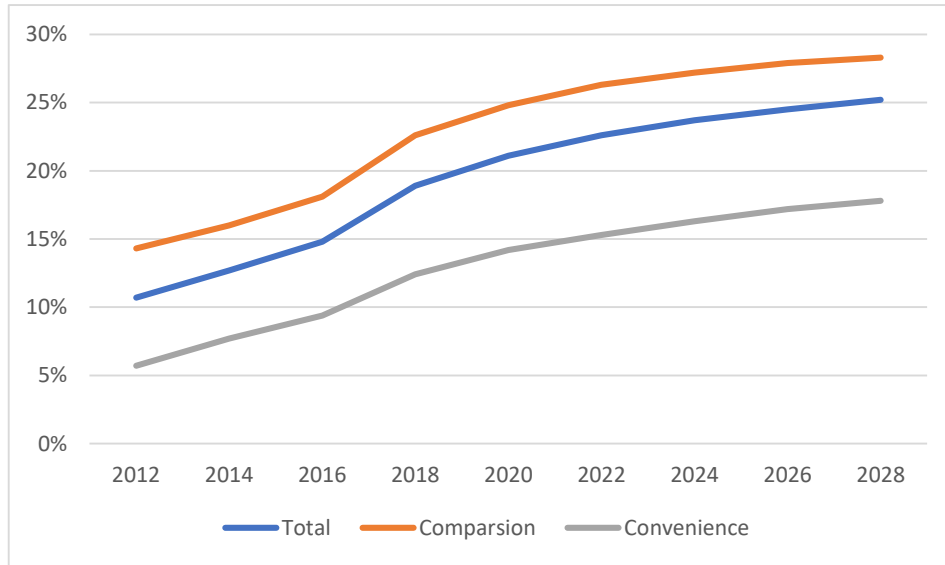
- Continued Rise in Internet Shopping;
- Increased Town Centre Vacancy Levels & Store Closures; and
- Uncertainty surrounding Brexit.

Continued Rise in Internet Shopping

2.2.2 Experian, in their latest Retail Planner Briefing Note identify that the strong increase in online shopping in the past decade has lifted the share of non-store retail sales to a level where at 2018 it accounted for close to 20% of total retail sales, against a little below 5% in 2008. It is estimated that the value of internet sales in 2018 totalled some £68.1bn.

2.2.3 The latest projections by Experian forecast that non-store retailing is to continue to grow rapidly, outpacing traditional forms of spending. Non-store retailing is anticipated to continue to increase at a faster pace than total retail sales well into the long term.

Figure 2.1: Estimated and Projected Market Share of Non-Store Retail Sales



Source: Experian Retail Planner Briefing Note 16 (December 2018)

Notes: Non-store retail sales (special forms of trading) comprises sales via the internet, mail order, stalls and markets, door to door and telephone sales.

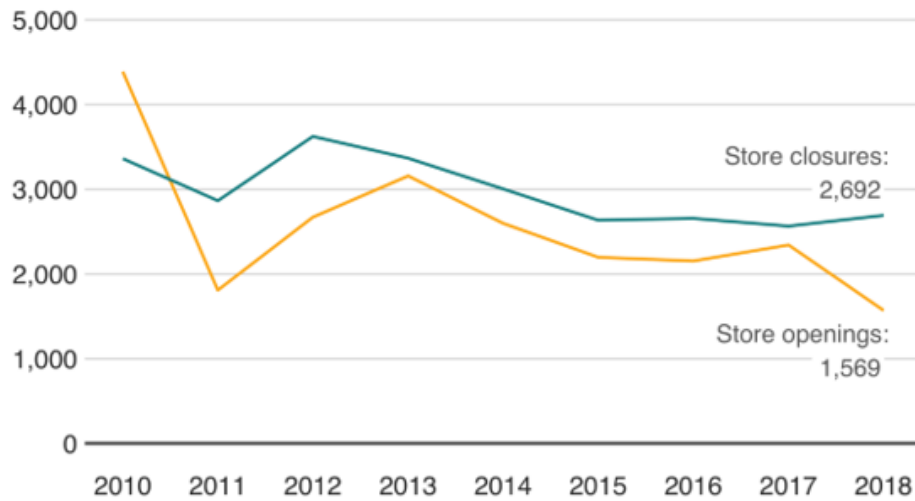
2.2.4 Experian highlight that whilst the challenge to traditional store-based shopping from internet-based shopping will continue to grow a number of factors temper the threat. These factors include:

- Many stores sell online but source sales from regular stores rather than warehouses, implying an increase in required store floorspace to cater for rising internet sales;
- Even if non-store retailing outpaces store-based shopping, store-based shopping is still expected to continue to expand at an annual average of 1.8% per annum in per capita terms;
- It is probable that sales via the internet will begin to grow less rapidly at some point in the next few years; and
- A significant development is multi-channelling, where internet shopping actually drives demand for traditional outlets. In-store product and services offer (including collection/drop-off points for online orders (click and collect)) forms part of a co-ordinated multi-channel strategy and will continue to support demand for retail space.

Increased Town Centre Vacancy Levels & Store Closures

2.2.5 PwC reported (November 2018) that in the first half of 2018 a net 1,123 stores disappeared from Britain's top 500 town centres compared with a 222 store loss over the equivalent period in 2017. Whilst daily store closures rates have plateaued at 14 stores a day, store openings have fallen, with a 773 difference between store opening in H1 (first half) 2017 and H1 2018.

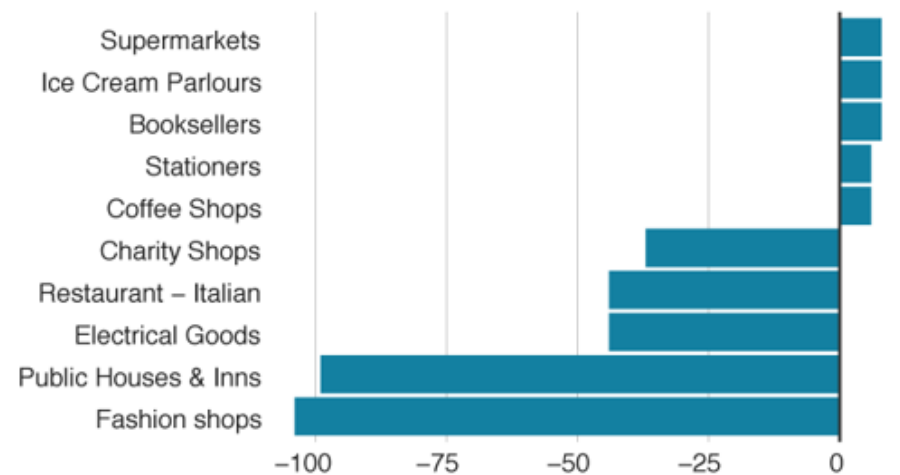
Figure 2.2: Openings and closures in Britain's Top 500 Town Centres- H1 2018



Source: PwC, Local Data Company

2.2.6 The research identified that supermarkets, ice cream parlours, booksellers, stationers, and coffee shops showed the highest increase in net store numbers in the first half of 2018. Whilst a continuing decline of fashion shops, electrical goods retailers, pubs, charity shops and Italian restaurants were recorded.

Figure 2.3: Net difference between Store Opening & Closures in Britain's Top 500 Town Centres - H1 2018



Source: PwC, Local Data Company

2.2.7 In looking at the localised picture for Ipswich, it was reported in the 2018 Central Shopping Area (October 2018) that vacancy rates of the shopping frontage in the Primary Shopping Area, which provides the main shopping and leisure offering, had risen significantly from 9.9% in 2017 to 14.8% in 2018. This increase in vacant frontage was caused principally as a result of the closure of Poundworld and Starbucks which occupied large units in the Town Centre. It should also be noted that this increase does not take account of the closure of the 'Ohh Deer' and 'Riley and Riley' Primary Shopping Area stores which have occurred since October 2018. In positive news however, Superdry opened a new store in July 2019 at the Buttermarket Centre.

2.2.8 Many retailers have found themselves struggling to pay their rents and other overheads, such as a rising minimum wage and business rates. This together with consumers doing more of their shopping online has resulted in a number of retailers restructuring (some involving a Company Voluntary Arrangement (CVA)) or going into administration including:

- Maplin entering into administration resulting in the closure of their 200+ stores (February 2018);
- Toys R Us going into administration closing all of its 105 stores (February 2018);
- Carpetright's announcement of its restructuring and closing some 81 of its 400 stores (April 2018);
- Fenwick department store's announcement to "modernise and reorganise the business" which could potentially involve store closures (April 2018);
- Mothercare's confirmation that it will close 50 of their 137 UK stores (May 2018);
- Poundworld going into administration closing all 355 of its stores (June 2018);
- House of Fraser entering into administration albeit immediately purchased by Sports Direct. At the time of writing it is not clear how many store closures will take place (August 2018);
- Homebase's owners (Hilco) announcement of closing a further 42 stores (61 in total) as part of a proposed CVA by early 2019 (August 2018);
- Coast entering into administration with Karen Millen buying part of the business excluding 24 retail stores (October 2018);
- New Look's announcement of its intention to close 85 stores following a restructuring plan (November 2018);
- Laura Ashley's announcement that it plans to reduce the number of its UK stores from 160 to 120 (December 2018);
- M&S's announcement that in total it will close 100 stores by 2022. 38 stores were announced as closing in 2018/2019, 30 of which have now closed. A further 17 store closures have since be named by M&S and are set to close in 2019/2020 (January 2019);
- HMV going into administration (for the second time in 6 years) with Sunrise Records buying the chain resulting in the closure of 27 stores (February 2019);
- Patisserie Valerie entering administration with Causeway Capital Partners (CCP) buying the chain. CCP is planning to keep all 100 stores open (depending on negotiations with landlords) (February 2019)
- Office Outlet entering administration confirming closure of all its stores (March 2019);

-
- Debenhams going into administration albeit immediately sold to a newly incorporated company controlled by Debenhams' lenders. It is expected that at least 50 of its 165 UK stores will close, 22 of which have already been announced (Ipswich was not identified as a closure) and due to close in early 2020 (April 2019);
 - Boots announcement of possible store closures to cut costs (April 2019);
 - Select falling into administration with 169 store closures expected if a new owner does not buy the fashion retailer (May 2019); and
 - Arcadia Group (Topshop/Burton/Dorothy Perkins/Topman/Wallis/Evans/Outfit and Miss Selfridge) announcement that it to close 50 stores as part of a rescue plan agreed with its creditors (June 2019).

2.2.9 It is clearly evident that current trading conditions for a number of retailers are tough. Such closures/changes can result in particularly significant impacts at medium/smaller sized town centres, which tend to be the subject of higher vacancy rates, and which have also often suffered related reductions in rental levels and footfall in recent years. As a consequence, a greater proportion of comparison goods expenditure is being claimed by a smaller number of centres of sub-regional or regional importance.

2.2.10 In Ipswich specifically, the following closures/ closure announcements have been announced:

- Ohh Deer – Thoroughfare (Closed - May 2019)
- Cotswold Outdoor – Tavern Street (Closed – June 2019)
- Trespass – Westgate Street (Closure announcement - May 2019)
- Riley & Riley Jewellers — Buttermarket (Closure announcement - May 2019)
- Poundworld – Tavern Street (Closed - July 2018)
- Office Outlet – Russell Road (Closed - March 2018)
- Monsoon – Closing – Westgate Street (Closed – July 2019)

2.2.11 The trading conditions and announcements identified at 2.2.8 and 2.2.9 have caused a degree of uncertainty surrounding the long-term future of some of the national retailers which have stores in Ipswich's, including:

- Debenhams – Westgate Street (April 2019)
- M&S – Westgate Street (January 2019)

-
- Bonmarche – 50-54 Westgate Street (April 2019)
 - HMV – Sailmakers (February 2019)
 - Topshop & Topman – Sailmakers (March 2019)
 - Jack Wills – 52 – 56 Tavern Street (February 2019)

2.2.12 It is not just convenience and comparison goods retailers that have seen challenges. There is evidence that the food and drink market is also becoming saturated with the likes of Byron Burger, Prezzo, Strada, Jamie's Italian, Gourmet Burger Kitchen, Chimichanga's, Giraffe, and Ed's Diner restructuring, closing outlets, or going into administration. In Ipswich specifically:

- Starbucks – Tavern Street (Closed September 2018)
- Golden Dragon – Cardinal Park (Closed April 2019)
- Chimichanga's – Cardinal Park (Closed March 2018)

Uncertainty Surrounding Brexit

2.2.13 At the time of writing the final results of the Brexit negotiations remain uncertain. If a deal is agreed by Members of Parliament, and subsequently accepted by the EU, plans will be in place to proceed with the terms of a deal including a two-year transition period. However, if a deal cannot be reached and further extensions are agreed to the Brexit process the UK will continue to face uncertainty.

2.2.14 The actual implications of Brexit on retailing in the UK will depend on the final outcome. GlobalData highlight three key implications as a result of Brexit:

- **Inflation will drive up food retail** - Brexit outcomes that create trade diversion between the UK and EU will see a potential steep increase in food prices. Higher import costs (through tariffs and the falling pound) that retailers will in part pass to consumers as well as lack of availability will result in higher demand and limited supply which would see prices on basic foodstuffs rise.
- **Non-food categories will feel the brunt of reduced spending** – non-food growth is expected to slow significantly in the event of a no deal, with the forecast rise in inflation failing to offset a drag on consumer confidence and a sharp decline in volume growth.
- **Consumer confidence will continue to decrease in face of prolonged uncertainty** – A no deal Brexit or delayed withdrawal will have an effect on lowered consumer confidence. If a Withdrawal Agreement is passed, there will be a minimised effect of lowered confidence on retail spend.

2.2.15 2019 will be an uncertain year for the UK consumer. It is difficult to predict what will happen given that so much depends on the nature of the UK's exit from the EU.

2.3 Government's Response to 'Transform Town Centres'

2.3.1 In the 2018 Budget, the Ministry of Housing, Communities and Local Government (MHCLG) announced a consultation on new planning reforms with various initiatives suggested that would allow for a more flexible and supportive approach to help transform/revitalise town centres. The suggested initiatives included changes to permitted development rights, business rate reliefs for small town centre businesses, and funding to help Councils in drawing up and implementing plans for town centres to adapt/respond to changes in the retail climate.

Changes in Permitted Development Rights and Use Classes

2.3.2 In October 2018 MHCLG issued a consultation document titled 'Planning Reform: Supporting the high street and increasing the delivery of new homes'. The consultation period ended earlier this year. The changes which the government is progressing to support greater diversity and footfall on the high street following the 'Planning Reform' consultation include:

- changes to permitted development rights (PDR) to allow shops (Use Class A1), financial and professional services (A2), hot food takeaways (A5), betting shops, pay day loan shops and launderettes to change to office use (B1);
- changes to PDR to allow hot food takeaways (A5) to change to residential use (C3);
- extending the current temporary change of use PDR for shops (A1) financial and professional services (A2), restaurants and cafes (A3), hot food takeaways (A5), offices (B1), non-residential institutions (D1), assembly and leisure uses (D2), betting shops and pay day loan shops to change to A1, A2, A3 or B1, to also allow changes to a public library, exhibition hall, museum, clinic or health centre. The period of the temporary use would also be extended from 2 to 3 years;
- amending Use Class A to ensure it captures current and future retail models, which will include clarification on the ability of (A) use classes to diversify and incorporate ancillary uses without undermining the amenity of the area
- creating a new PDR that would be subject to prior approval (covering design, siting, appearance, impact on amenity, flooding and contamination risks, transport and highways), to allow additional storeys to be built above buildings in commercial, residential (C3) and some other uses (such as out-of-centre retail and leisure parks, or health centres). This change will be dealt with by regulations in Autumn 2019.

2.3.3 The Government intends to implement an immediate package of permitted development right measures in the spring, with the more complex matters, including on upward extensions, covered in a further package of regulations in the autumn 2019.

Business Rate Relief

2.3.4 In his Budget, the Chancellor confirmed the government will cut business rates by a third for small town centre retailers/businesses with a rateable value of less than £51,000. The government's funding for business rates relief totals £900 million. Under the plan, small firms will receive a one-third discount on their rates bills for two years. The Chancellor indicated the business rate reliefs would introduce an average annual saving of £8,000 for 90% of independent businesses.

2.3.5 Whilst the cut to business rates for small businesses has been welcomed, there has been disappointment that the fund doesn't help medium and large high street businesses which have been hardest hit by rate rises.

2.3.6 At the same time as announcing business rate reliefs the government also announced the introduction of a digital services tax from April 2020. The digital services tax is a levy against social media platforms, internet marketplaces and search engines. It is intended to be targeted at "*established tech giants*" rather than start-ups. The government is proposing a 2% tax rate against the sales that large digital companies make in the UK. It would be imposed on companies that are profitable and generate "*at least £500m a year in global revenue*".

Future High Street Fund

2.3.7 As part of the 2018 Budget, a new £675 million Future High Streets Fund was announced that is intended to assist local areas to respond/adapt to changes in their town centres, by using long term strategies. There was competition for the funding with local areas expected to partner with the private sector in their proposals, which should set out an overall vision of the specific improvements that would contribute to its achievement. It is envisaged that the Fund will then co-fund projects such as:

- investment in physical infrastructure, including improving public and other transport access, improving flow and circulation within a town/ city centre, congestion-relieving infrastructure, other investment in physical infrastructure needed to support new housing and workspace development and existing local communities, and the regeneration of heritage high streets; and
- investment in land assembly, including to support the densification of residential and workspace around high streets in place of under-used retail units.'

2.3.8 A new High Streets Taskforce will also be created and funded, to support local leadership. The fund will also support the regeneration of heritage high streets (up to £55 million of the overall fund). This has two

elements: (1) helping to restore historic properties through Historic England; and (2) providing communities with resources to put historic buildings back into economic use.

2.3.9 The timescales for the Future High Streets Fund set out by MHCLG are as follows:

- 2018: launch of the full prospectus.
- Spring 2019: launch of the High Streets Taskforce.
- 28 March 2019: Stage 1 Expressions of Interest, with local authorities developing private sector partnerships to deliver capital projects.
- Summer 2019: gateway assessment, with bids to be taken to Stage 2 (and local areas working up more detailed business cases).

2.4 Summary

2.4.1 Similar to town centres across the UK, Ipswich Town Centre continues to face a number of challenges, particularly from the continued rise of internet shopping. 2018 was a challenging year for retailers with the most store closures reported since the 2008 global recession. Ipswich Town Centre has however thus far fared well with store closures reasonably limited. The occupation of the former BHS store in Ipswich Town Centre continues to remain a challenge and uncertainty remains about the future of, inter alia, the Debenhams, M&S, Topshop & Topman, Jack Wills, and HMV stores within the town centre.

2.4.2 With the outcome of Brexit still undetermined, uncertain times remain for the UK consumer and retailers alike. Given that so much depends on the nature of the UK's exit from the EU it is difficult to predict what will actually happen and what impact the outcome of Brexit will have on Ipswich Town Centre.

2.4.3 A number of initiatives are currently being progressed by the Government to allow for a more flexible and supportive approach to help transform/revitalise town centres. The initiatives, originally announced in the October 2018 Budget, include changes to permitted development rights, business rate reliefs for small town centre businesses, and funding to help Councils in drawing up and implementing plans for town centres to adapt/respond to changes in the retail climate. In terms of Future High Street Funds, we understand Ipswich Town Centre was not consider to require funding by the Government under this initiative. Government's initiatives have generally been welcomed, however the impact will not be evident for some months/years.

2.4.4 Notwithstanding the challenges faced by town centre retailers, it is important to note, as acknowledged in the National Planning Policy Framework, the role of town centres is much greater than just retail. As such, and as advised in the 2017 Study, it is important Ipswich Town Centre future strategy seeks to support existing and attract new non-retail uses including residential and offices (albeit without adversely impacting the retail function of the town centre).

3.0 Updated Quantitative Retail Need Assessment

3.1 Introduction

3.1.1 This section of the statement provides an update on the retail capacity/quantitative need for additional convenience and comparison goods floorspace in the Borough. It takes into account the following:

- new/updated retail expenditure per capita data (based on Experian's UK 2018 data release);
- updated retail expenditure growth projections and data (Experian Retail Planner Briefing Note 16 (December 2018));
- updated grocery sales density data (GlobalData.com);
- updated grocery floorspace data; and
- the current position on retail planning commitments/permissions (adding any new planning permissions and removing those that have either expired or no longer involve A1 retail floorspace).

3.1.2 The assessment updates the base year to reflect the current year (2019) and, to allow direct comparison with the original 2017 Retail and Commercial Leisure Town Centre Study, assesses capacity at years 2026, 2031 and 2036. Given that the revised NPPF now identifies that policies only need to look at least ten years and not necessarily over the full plan period when allocating sites to meet the 'likely' need for town centre uses, this statement also assesses capacity at 2029.

3.1.3 For the avoidance of doubt, all other elements of the 2017 Retail Study methodology and assumptions remain unchanged.

3.1.4 Updated quantitative retail capacity statistical tables are contained at **Appendices A-C** of this statement.

3.2 Comparison Goods Capacity

Ipswich Borough

3.2.1 Figures 3.1 and 3.2 set out the overall comparison goods floorspace capacity requirements in 2036 before and after commitments. They show that primarily as a result of:

- (1) reduced forecasts of growth in comparison goods expenditure per head;
- (2) higher forecasts of growth in internet shopping;

(3) higher forecast comparison goods sales density growth; and

(4) the additional retail commitment at Anglia Retail Park (additional mezzanine floor at Dunelm);

the comparison goods floorspace capacity requirements in the Borough have significantly reduced since the 2017 Study.

Figure 3.1: Summary of Comparison Goods Floorspace Need in Ipswich Borough (sq m net) (before commitments/planning permissions)

Year	2017 Retail Study		2019 Update		Difference	
	Min	Max	Min	Max	Min	Max
2026	12,400	22,700	5,400	9,900	-7,000	-12,800
2029	Not Tested	Not Tested	11,200	20,600	-	-
2031	23,500	43,200	15,600	28,600	-7,900	-14,600
2036	37,500	68,800	27,800	51,100	-9,700	-17,700

Source: Table 16b of Appendix B
Assumes constant market share of Study Area expenditure claimed by facilities in Ipswich Borough
Table 16b of Appendix K, October 2017 Retail Study
2015 Prices

Figure 3.2: Summary of Comparison Goods Floorspace Need in Ipswich Borough (sq m net) (after commitments/planning permissions)

Year	2017 Retail Study		2019 Update		Difference	
	Min	Max	Min	Max	Min	Max
2026	9,600	17,600	4,100	7,600	-5,500	-10,000
2029	Not Tested	Not Tested	9,900	18,200	-	-
2031	20,800	38,100	14,300	26,200	-6,500	-11,900
2036	34,800	63,700	26,500	48,700	-8,300	-15,000

Source: Table 16c of Appendix B
List of commitments provided at Appendix B (Table 16d).
Assumes constant market share of Study Area expenditure claimed by facilities in Ipswich Borough
Table 16c of Appendix K, October 2017 Retail Study
2015 Prices

3.2.2 Figure 3.2 shows that by 2029 (the minimum timeframe identified by the NPPF when allocating sites), after commitments, there is estimated to be a comparison goods floorspace capacity of between 9,900-18,200sq m net. By the end of the plan period (2036) this is assessed to increase to between 26,500-48,700sq m net.

3.2.3 A minimum and maximum floorspace requirement is identified to reflect the variations in retailer sales densities. The minimum floorspace requirement assumes a sales density of circa £5,730/sq m (@2019) which we consider to be towards the higher end of what could be achieved in Ipswich. The maximum floorspace requirement assumes a lower sales density of circa £3,130/sq m (@2019) which we consider to be towards the lower end of what could be achieved in Ipswich. The minimum figure is based on the identified need being met through the delivery of high street floorspace in Ipswich Town Centre and the

maximum figure relates to need being met by bulky goods retailers, which generally accommodate operators which achieve lesser sales densities. It is considered that the minimum floorspace requirement figure should be adopted when planning for additional floorspace in the Town Centre.

Copdock/Interchange

- 3.2.4 Given that Copdock/Interchange, whilst within neighbouring Babergh District Council, is located within the 'urban area' of Ipswich and primarily serves residents within Ipswich Borough, the 2017 Study advised, in accordance with the sequential approach to site selection, that any identified capacity at Copdock/Interchange should be directed to Ipswich Town Centre. Accordingly, Figure 3.3 below provides an updated summary of the estimated floorspace capacity for the Copdock/Interchange area and compares the updated capacity figures with those identified in the 2017 Study. The Council has confirmed that there are no comparison goods retail commitments/planning permissions/floorspace developed since the 2017 Study in the Copdock/Interchange area that would need to be taken into account in this capacity assessment.
- 3.2.5 Figure 3.3 shows that, similar to the comparison goods capacity figures identified for Ipswich Borough, the estimated comparison goods floorspace capacity at Copdock/Interchange has also reduced. Again, this is primarily due to reduced comparison goods expenditure forecasts and higher forecasts of internet shopping and sales density growth.

Figure 3.3: Summary of Quantitative Need for Comparison Goods Floorspace at Copdock/Interchange (sq m net)

Year	2017 Retail Study		2019 Update		Difference	
	Min	Max	Min	Max	Min	Max
2026	600	1,100	300	500	-300	-600
2029	Not Tested	Not Tested	600	1,000	-	-
2031	1,200	2,200	800	1,500	-400	-700
2036	1,900	3,500	1,400	2,600	-500	-900

Source: Table 17b of Appendix B
 Assumes constant market share of Study Area expenditure claimed by facilities in Copdock/Interchange
 Table 17b of Appendix K, October 2017 Retail Study
 2015 Prices

- 3.2.6 Figure 3.3 shows that existing out-of-centre retail facilities at Copdock/Interchange continue to generate comparison goods floorspace capacity for new floorspace over the plan period. It identifies that there is a comparison goods floorspace requirement of between 600sq m and 1,000sq m net by 2029 increasing to between 1,400sq m and 2,600sq m net by the end of the plan period. For the reasons given in paragraph 3.2.3 we consider that the minimum floorspace requirement should be adopted by the Council when planning for additional floorspace in Ipswich Town Centre.

3.3 Convenience Goods Capacity

Ipswich Borough

- 3.3.1 Turning to convenience goods capacity, Figures 3.4 and 3.5 set out the overall convenience goods floorspace capacity requirements in the plan period before and after commitments. They also compares the updated floorspace capacity need with the capacity need figures identified in our original October 2017 Retail & Leisure Study.
- 3.3.2 Figures 3.4 and 3.5 show that the overall convenience goods minimum floorspace capacity requirements in Ipswich Borough have reduced.

Figure 3.4: Summary of Convenience Goods Floorspace Need in Ipswich Borough (sq m net) (before commitments/planning permissions)

Year	2017 Retail Study		2019 Update		Difference	
	Min	Max	Min	Max	Min	Max
2026	1,600	2,000	1,200	1,500	-400	-500
2029	Not Tested	Not Tested	1,700	2,100	-	-
2031	2,200	2,700	1,800	2,300	-400	-400
2036	2,900	3,700	2,900	3,600	0	-100

Source: Table 5b of Appendix C
 Table 5b of Appendix J, October 2017 Retail Study
 Minimum floorspace requirement - Average sales density based on the average sales density of the leading four supermarket operators as identified by GlobalData.com
 Maximum floorspace requirement – Average sales density based on the average of discount operators (Aldi & Lidl)
 2015 Prices

Figure 3.5: Summary of Convenience Goods Floorspace Need in Ipswich Borough (sq m net) (after commitments/planning permissions)

Year	2017 Retail Study		2019 Update		Difference	
	Min	Max	Min	Max	Min	Max
2026	400	500	0	0	-400	-500
2029	Not Tested	Not Tested	0	0	-	-
2031	900	1,200	100	100	-800	-1,100
2036	1,600	2,100	1,200	1,500	-400	-600

Source: Table 5c of Appendix C
 List of commitments provided at Appendix C (Table 6d).
 Table 5c of Appendix J, October 2017 Retail Study
 Minimum floorspace requirement - Average sales density based on the average sales density of the leading four supermarket operators as identified by GlobalData.com
 Maximum floorspace requirement – Average sales density based on the average of discount operators (Aldi & Lidl)
 2015 Prices

- 3.3.3 After retail planning permissions/convenience goods floorspace developed since the 2017 Study there is now no identified capacity for additional convenience goods floorspace in the Borough in the short to medium term (0-10 years (by 2029)).

3.3.4 Within the plan period (to 2036), after retail commitments/planning permissions/floorspace built since the 2017 Study, minimum convenience goods floorspace capacity need in the Borough has reduced by 400sq m net to 1,200sq m net with the maximum floorspace requirements reducing by 600sq m net to 1,500sq m net.

3.3.5 The reduction in convenience goods floorspace requirements is primarily attributable to the reduced forecasts of growth in convenience goods expenditure per head and the higher convenience goods sales density growth.

Copdock/Interchange

3.3.6 As noted earlier in this section, Copdock/Interchange, located on the south-western fringe of Ipswich, whilst within neighbouring Babergh District Council, primarily serves residents within Ipswich Borough, and in accordance with the sequential approach any identified capacity at Copdock/Interchange should be directed to Ipswich Town Centre first. Accordingly, in similar fashion to our updated assessment of comparison goods capacity, we update our 2017 convenience goods capacity below.

3.3.7 Figure 3.6 below summarises the convenience goods quantitative need findings for Copdock/Interchange. The Council have confirmed that there remain no convenience goods planning permissions/commitments/floorspace developed since the 2017 Study within the Copdock/Interchange area that needs to be taken into account in the capacity assessment.

Figure 3.6: Summary of Quantitative Need for Convenience Goods Floorspace at Copdock/Interchange (sq m net)

Year	2017 Retail Study		2019 Update	
	Min	Max	Min	Max
2026	0	0	0	0
2029	0	0	0	0
2031	0	0	0	0
2036	0	0	0	0

Source: Table 6b of Appendix C
 Table 6b of Appendix J, October 2017 Retail Study
 Minimum floorspace requirement - Average sales density based on the average sales density of the leading four supermarket operators as identified by GlobalData.com
 Maximum floorspace requirement – Average sales density based on the average of discount operators (Aldi & Lidl)
 2015 Prices

3.3.8 Figure 3.6 shows, as a result of existing convenience goods facilities (Tesco Extra and Aldi) in Copdock/Interchange under-trading, there continues to be no capacity for additional convenience goods floorspace at Copdock/Interchange in the plan period.

3.4 Summary

3.4.1 The updated quantitative retail need findings identified for Ipswich Borough are summarised in Figure 3.7 below.

Figure 3.7: Quantitative Need Capacity Summary

Sector	Capacity (sq m net)	
	2029 (Minimum NPPF Period)	2036 (Plan Period)
Before Commitments		
Comparison Goods (sq m net)	11,200sq m - excluding Copdock/Interchange 11,800sq m - including Copdock/Interchange	27,800sq m - excluding Copdock/Interchange 29,200sq m - including Copdock/Interchange
Convenience Goods (sq m net)	1,700-2,100	2,900-3,600sq m
After Commitments		
Comparison Goods (sq m net)	9,900sq m - excluding Copdock/Interchange 10,500sq m - including Copdock/Interchange	26,500sq m - excluding Copdock/Interchange 27,900sq m - including Copdock/Interchange
Convenience Goods (sq m net)	nil	1,200-1,500sq m

Notes:

Comparison goods floorspace capacity figure is the minimum floorspace requirement figure. WYG consider this figure more accurately reflects the likely average sales density figure achieved by comparison goods retailers in Ipswich Town Centre and therefore should be adopted for additional floorspace in the town centre.
2015 Prices

- 3.4.2 Our 2017 Study (paragraph 8.2.10) identified that *"growth in retail expenditure forecast in the longer term (beyond the next ten years) should be treated with caution given the inherent uncertainties in predicting the economy's performance over time"*. The revised NPPF now recognises the uncertainty in forecasting long-term retail trends and now sets out that policies only need to look at least ten years ahead and not necessarily over the full plan period when allocating sites to meet the likely need for town centre uses.
- 3.4.3 Accordingly, given the requirements of the NPPF, after taking into account commitments/retail floorspace built since 2017, the Council only needs to allocate sites to meet the 9,900sq m net of identified 2029 comparison goods capacity. Identified comparison goods capacity requirements in Ipswich have reduced since the original 2017 Study primarily due to reduced forecasts of growth in comparison goods expenditure per head, higher forecasts of growth in internet shopping, and a higher forecast comparison goods sales density growth.
- 3.4.4 It is assessed that, after commitments, there is no capacity for additional convenience goods retail floorspace to 2029 and therefore no need to allocate any sites for convenience goods retailing. The reduction in convenience goods floorspace requirements in Ipswich is primarily attributable to the reduced forecasts of growth in convenience goods expenditure per head and the higher convenience goods sales density growth.

3.4.5 The redistribution of the identified comparison goods floorspace capacity for Copdock/Interchange to Ipswich results in a circa 600sq m net increase in Ipswich Borough's identified capacity requirements at 2029 (1,400sq m net @ 2036). As advised in our 2017 study, it is important that both Babergh District and Ipswich Borough Councils engage with one another to make sure the policy approach for retail capacity at Copdock/Interchange is embedded in policy for both authority areas.

4.0 Town Centre Retail Composition, Requirements and Vacancy Level Update

4.1 Introduction

4.1.1 This section of the statement provides an update on the convenience and comparison goods composition and vacancy levels in Ipswich Town Centre. In accordance with the brief it also updates registered convenience and comparison goods retailer requirements for the town centre.

4.2 Update on Ipswich Town Centre Convenience & Comparison Goods Retail Composition

4.2.1 We review below whether there have been any changes in the convenience and comparison goods composition of Ipswich Town Centre since the original 2017 Retail and Leisure Study.

4.2.2 Figures 4.1 and 4.2 set out the retail and leisure composition of Ipswich Town Centre at October 2018. A plan illustrating the location and use of each unit in the Town Centre is also attached at **Appendix D**.

4.2.3 For ease of reference, Figures 4.1 and 4.2 also set out the composition of Ipswich Town Centre at February 2017, the survey date for the 2017 Retail and Leisure Study.

Figure 4.1: Ipswich Town Centre Diversity of Use for Commercial Units

	February 2017		October 2018		UK Average
	No.	%	No.	%	%
Convenience	54	8	54	8	9
Comparison	208	32	187	29	30
Retail Service	91	14	96	15	15
Leisure Service	131	20	141	22	24
Financial & Business Service	79	12	74	11	10
Vacant	96	15	99	15	11
Total	659	100	651	100	100

Source: Experian Goad Survey

UK average figure is at December 2018 (latest available at time of writing)

% figures may not add due to rounding

Figure 4.2: Ipswich Town Centre Diversity of Use for Commercial Floorspace

	February 2017		October 2018		UK Average
	Sq m Gross	%	Sq m Gross	%	%
Convenience	8,840	6	9,370	6	15
Comparison	66,750	44	57,870	39	35
Retail Service	8,630	6	8,060	5	7
Leisure Service	31,290	21	35,880	24	25
Financial & Business Service	14,010	9	13,730	9	8
Vacant	20,884	14	23,570	16	10
Total	150,404	100	148,480	100	100

Source: Experian Goad Survey

UK average figure is at December 2018 (latest available at time of writing)

% figures may not add due to rounding

Comparison Goods

4.2.4 Figure 4.1 shows that the number and proportion of comparison goods units has fallen by some 21 units since the 2017 Study. The level of floorspace occupied by comparison goods retailers has also decreased by 8,880sq m gross (-13%) since 2017. The Town Centre currently provides 187 comparison goods units within 57,870sq m gross floorspace. The proportion of units in comparison goods use is slightly below the national average (29% compared to UK average of 30%) whilst in floorspace terms remains higher than the national average (39% compared to UK average of 35%).

4.2.5 Comparison goods retailers that have closed between February 2017 and October 2018 include:

- Tavern Street: Poundworld, Virgin Media and Menkind Gifts;
- Westgate Street: Now! Ladies & Menswear;
- Sailmakers Shopping Centre: Calendar Club Gifts & Total Mobiles;
- Buttermarket: Regatta Outdoor Clothing and Jones Bootmaker; and
- Queen Street/St Nicholas Street: Bobella's Boutique and Finishing Touches Blinds.

4.2.6 Whilst the overall number of comparison goods retailers has decreased, the Town Centre has also experienced a number of new comparison goods retailers opening new premises. Such retailers include:

- Tavern Street: Hotter Shoes, Accessorize (relocation from Tavern Street to a larger store) and Superdrug (relocation from Westgate Street);
- Westgate Street: Tessuti Menswear;
- Buttermarket: Joules Clothing, and Zami for Telephones;
- Sailmakers Shopping Centre: Baldwins Department Store (relocation from Westgate Street) and HMV (relocation from Tavern Street); and

-
- Queen Street/St Nicholas Street: Lady Norfolk and Lord Rust Interior; Cats Protection Charity Shop and Zest Charity Shop.

- 4.2.7 In addition to the above store openings/relocations, we understand that Superdry opened a new store within the Buttermarket Shopping Centre in July this year. We also understand that there is also a planning application to amalgamate the Claire's and tReds stores at 11/13 Westgate Street into one large Sketchers store (application ref: 19/00357/FUL).
- 4.2.8 Whilst the level of comparison goods floorspace has reduced by 8,880sq m since 2017, a large proportion of this reduction is accountable to the closure of two comparison goods units: 36-38 Carr Street (former Age UK store) and 46-48 Tavern Street (former Poundworld store).
- 4.2.9 Notwithstanding the overall reduction in comparison goods retailers, we consider that Ipswich Town Centre continues to provide a good variety of both national and independent traders. It is noted that the Town Centre has not lost any of the Experian Goad defined top comparison goods retailers since 2017 and, at the time of writing, with the exception of Poundworld, the Town Centre has not been materially impacted by national retailer store closures identified in Section 2 of this statement. However, this could potentially change subject to the announcements of store closures from Debenham's, Marks & Spencer, and Boots in the next year. It is noted that neither of the Debenham's or Marks & Spencer stores in Ipswich Town Centre were identified for closure in the retailers first phase of store closures but both companies are still to announce further store closures in the next year.

Convenience Goods

- 4.2.10 Figure 4.1 shows that current number of convenience stores in the town centre remains slightly below the UK average level of provision, with the 54 units in this use comprising 8% of commercial units. Whilst the number of units in convenience goods has remained the same, there have been a number of changes in retailers/units between 2017-2018. The changes have resulted in the overall convenience goods floorspace increasing by 530sq m gross. Changes include:

Openings

- Hotel Chocolat, Tavern Street.
- Your Local Supermarket, St Matthews Street.
- Super Food Convenience Store, St Matthews Street.
- Superdrugs, Buttermarket.
- Ipswich Blue Star Convenience Shop, Princes Street

Closures

-
- MET-Rx Health Food, The Walk.
 - The Sweet Hut, The Walk.

4.2.11 As noted in our 2017 review, whilst the proportion of convenience goods floorspace in the Town Centre is significantly below the national average (6% compared to UK average of 15%) this is expected within a town centre of sub-regional importance as such centres typically provide a larger level of comparison goods floorspace.

4.3 Update of Ipswich Town Centre Registered Convenience & Comparison Goods Retailer Requirements

4.3.1 'The Requirements List' set out requirements for additional floorspace in particular town centres. It should be noted that each retailer/leisure operator will have particular size, layout and format requirements and that some operators may not have specifically identified town centre representation, instead targeting regions or even nationwide expansion.

4.3.2 'The Requirements List' only records the published requirements of high street multiple operators. However, as noted in our 2017 Study, it is of relevance in identifying the type and broad number of operators currently seeking representation.

4.3.3 Figure 4.3 sets out the requirements from multiple comparison and convenience goods operators at the time of the 2017 Study (as set out in Figure 6.6 of the Study) and at April 2019. It shows that a total of 11 retail operators are currently seeking premises in the town centre. This is a slight reduction from 14 operator requirements identified in 2017.

4.3.4 Of those that currently have a requirement it is noted that despite recently closing premises in the town centre both QD Variety Store and Calendar Club are seeking premises to re-open a store in the town centre. It is noted that Aldi, Slaters Menswear, The Fragrance Shop, and Hawkins Bazaar continue to have a requirement for premises whilst new requirements have been identified by Lidl, Savers and charities Wood Green and British Heart Foundation (for two separate charity shops).

Figure 4.3: Registered Convenience/Comparison Goods Retail Requirements, Ipswich

Name	Min Size (sq m)	Max Size (sq m)	Name	Min Size (sq m)	Max Size (sq m)
2017 (January)					
Aldi	1,700	1,900	Linens Direct	186	279
Moda in Pelle	56	139	Lakeland (relocation)	279	557
Cycle Republic	279	557	Slaters Menswear	325	743
Hawkins Bazaar	149	279	Cards Direct	111	186
Pavers Shoes	232	372	The Fragrance Shop	19	139
Fone World	23	74	Dr Martens	93	186
Steamer Trading Cookshop	70	93	iSmash	19	46
2019 (April)					
Savers	139	279	Aldi	1,765	
QD Stores	279	6,968	Wood Green (Animals Charity)	65	186
Slaters Menswear	325	743	Calendar Club	74	186
British Heart Foundation (Furniture & Electrical)	465	743	British Heart Foundation (Clothing)*	74	139
Hawkins Bazaar	149	279	The Fragrance Shop	19	139
Lidl	929	2,787			

Source: 'The Requirements List'

British Heart Foundation has recently opened a shop in the former Jones Store, Buttermarket and at Rosehill.

- 4.3.5 Overall, despite the current difficult retail trading conditions the level of demand for premises in Ipswich Town Centre is considered to be reasonably good. However, it is noted that whilst in 2017 there were a number of requirements from premium brand retailers there are currently no requirements from such retailers.

4.4 Changes in Vacancy Levels in Ipswich Town Centre

- 4.4.1 Figure 4.4 and 4.5 below set out the vacancy details and changes by defined shopping zone in Ipswich Town Centre between February 2017 and October 2018. The information has been derived from Experian Goad Land Use Surveys for the town centre. The October 2018 version is the latest available survey for Ipswich Town Centre. Experian Goad survey plans showing the location of all the vacant units at the time of the two survey dates are attached at **Appendix E**.

Figure 4.4: Vacancies Details - Ipswich Town Centre (February 2017)

Ipswich Shopping Zone	Units		Floorspace	
	No.	% of Units in Zone	sq m gross	% of Floorspace in Zone
Primary	27	13	8,850	14
Secondary	39	18	7,090	15
Specialist	18	12	2,224	12
Outside of Zones	12	20	2,720	20
Total	96	15	20,884	14

Note: Experian Goad Survey

Figure 4.5: Vacancies Details - Ipswich Town Centre (October 2018)

Ipswich Shopping Zone	Units		Floorspace	
	No.	% of Units in Zone	sq m gross	% of Floorspace in Zone
Primary	37	18	8,590	13
Secondary	31	15	7,300	16
Specialist	18	12	2,220	12
Outside of Zones	14	22	5,460	40
Total	99	15	23,570	14

Note: Experian Goad Survey

- 4.4.2 Figures 4.4 & 4.5 show that the number of vacant units in Ipswich Town Centre (as defined by Experian) has increased since 2017 (+3 units). The level of floorspace vacant in the Town Centre has also seen an increase since 2017 (+2,686sq m gross).
- 4.4.3 The overall proportion of vacant units in the Town Centre (15%) remains higher than the UK average (11%). In floorspace terms the level of vacant floorspace (14%) also remains at a higher level than the UK average (10%).
- 4.4.4 In the defined Ipswich Town Centre Primary Shopping Zone there has been a notable increase in vacant units since 2017 (+10). However, the level of floorspace vacant has actually decreased (by -260sq m gross). The decrease in floorspace is primarily due to the alterations in Buttermarket Shopping Centre. The current number of vacant units stands at 37 which represent 18% of the total number of units in the Primary Shopping Zone (an increase from 13%).
- 4.4.5 In terms of the take-up of vacant units in the Primary Shopping Zone, since 2017, 8 units have been re-occupied, including 29-31 Westgate Street (590sq m gross) by Tessuti (menswear). 4 of the vacant units are new following the remodelling/refurbishment of the Buttermarket Shopping Centre which has taken place since the 2017 survey. Since 2017, 7 units have become vacant along Tavern Street/Westgate Street. Retailers that have vacated premises include Poundworld, Starbucks Coffee Shop, Virgin Media store, Norwich & Peterborough Building Society, The Phone Workshop, and Now Ladies & Men's Wear.
- 4.4.6 The 15 units that have remained vacant in the Primary Shopping Zone include: the former BHS store, Buttermarket (2,000sq m gross), 4 ground floor units within the Buttermarket Shopping Centre, and 6 units in the Sailmakers Shopping Centre. As noted earlier, Superdry will be opening a new 152sq m gross store within the Buttermarket Shopping Centre later this year reducing the vacancy level in the shopping centre. The Sailmakers Shopping Centre has seen an increase in vacant units from 8 to 12. Since 2017, only 2 units in the shopping centre have been re-occupied.
- 4.4.7 In contrast to the Primary Shopping Zone, the defined Secondary Shopping Zone has seen a decrease in the number of vacant units (-8) since 2017 with the current number of units vacant standing at 31. The overall level of vacant floorspace has however marginally increased.

-
- 4.4.8 In terms of the defined Specialist Shopping Zone the overall number of units vacant has remained unchanged (at 18). The level of floorspace vacant has also remained largely unchanged since 2017.
- 4.4.9 Elsewhere in the Town Centre (as defined by Goad) there has been a small increase in vacant units (from 12-14 units). There has also been a significant increase in floorspace that is vacant elsewhere in the town centre (+2,740 sqm gross). This increase is primarily due to no. 36-38 Carr Street becoming vacant following Age UK charity shop vacating the unit. We understand that there are potential plans to convert this unit into a school.
- 4.4.10 It is noted that in February 2017 Ipswich Town Centre's Secondary Shopping Zone contained the highest number of vacant units. However, the latest survey identifies that the town centre's Primary Shopping Zone now contains both the largest number of vacant units and level of vacant floorspace which may suggest a weakening in the town centre's primary shopping area.

4.5 Summary

- 4.5.1 Ipswich Town Centre continues to provide a good variety of both national and independent traders. With the exception of Poundworld, the town centre has not been materially impacted by national retailer store closures. However, this could change subject to the future announcements of store closures from Debenhams, Marks & Spencer, and Boots later this year.
- 4.5.2 Despite the current difficult retail trading conditions the level of demand for premises in Ipswich Town Centre is considered to be reasonably good. However, vacancy levels in the Primary Shopping Zone have increased with 15 units remaining vacant since 2017. We would recommend that the Council continue to monitor vacancy levels in the Primary Shopping Zone and continue to actively work with stakeholders to seek suitable occupiers for these units.

5.0 Conclusions/Recommendation

5.1 Introduction

- 5.1.1 This final section of this Statement sets out a summary of the identified quantitative retail capacity and reviews whether taken together the need is met by: (1) the sites identified by the Council for retail development in the upcoming Local Plan Review and; (2) existing vacant units within Ipswich Town Centre.
- 5.1.2 If in-centre, edge of centre and out-of-centre site (which are accessible to the town centre) and vacant floorspace within Ipswich Town Centre are unable to meet the identified retail capacity, this section will also advise what strategy the Council should consider in terms of seeking to meet any potential remaining retail capacity.
- 5.1.3 Whilst at the time of the original 2017 Study the 2012 NPPF required planning policies to allocates sites to meet the retail needs in full over the plan period, the 2019 NPPF now sets out that planning policies only need to look at least ten years ahead when allocating sites to meet the likely need for town centre uses.
- 5.1.4 Given the current economic retail climate and identified retail trends in Section 2 of this Statement and the town centre qualitative matters set out in Section 4 (in particular the increasing vacancy levels in the Primary Shopping Zone), we advise the Council that they should plan for the identified needs within the minimum required NPPF period – 10 years (2029).

5.2 Summary of Updated Retail Floorspace Capacity

- 5.2.1 Figure 5.1 below summarises the updated quantitative retail need capacity for Ipswich Borough at the year 2029 before and after commitments.

Figure 5.1: Quantitative Need Capacity Summary (sq m net)

Sector	2029 (Minimum NPPF Period)
Before Commitments	
Comparison Goods	11,200sq m - excluding Copdock/Interchange 11,800sq m - including Copdock/Interchange
Convenience Goods	1,700-2,100sq m
After Commitments	
Comparison Goods	9,900sq m - excluding Copdock/Interchange 10,500sq m - including Copdock/Interchange
Convenience Goods	nil

5.2.2 The comparison goods floorspace capacity figure is the minimum floorspace requirement figure set out in the capacity tables. As noted earlier in this statement, WYG consider the minimum floorspace capacity figure more accurately reflects the likely average sales density figure achieved by comparison goods retailers in Ipswich Town Centre and therefore should be adopted when planning for additional floorspace in the Town Centre.

5.3 Capacity of Upcoming Local Plan Review Sites

5.3.1 Figure 5.2 sets out the estimated retail floorspace capacity of sites identified in the upcoming Local Plan Review. Overall, it is estimated that the sites are capable of accommodating circa 10,700sq m net of comparison goods floorspace and 2,000sq m net of convenience goods floorspace.

Figure 5.2: Upcoming Local Plan Review Site Capacity Summary

Site	Estimated Floorspace Capacity (sq m net)
Comparison Goods	
IP347 - Mecca Bingo, Lloyds Avenue	650
IP348 - East side of Princes Street & Coytes Gardens	400
IP348 - West side of Princes Street	275
IP048 - West side of Mint Quarter	4,800
IP040 - North half of Westgate	2,050
IP054 - Turret Lane West	280
IP132 and IP136 – St Peters Dock	280
IP037 Island Site	280
IGS comparison allocation	1,220
Sproughton Road District Centre	500
Total	10,735
Convenience Goods	
New District Centre at Ipswich Garden Suburb	2,000
Total	2,000

Source: Ipswich Borough Council, March 2019

5.4 Can Upcoming Local Plan Review Sites meet identified Quantitative Convenience Goods Retail Floorspace Capacity?

5.4.1 As summarised in Figure 5.1, after taking into account convenience goods retail planning commitments/planning permissions (see Table 5d, Appendix C, for list of commitments), and assuming those commitments that haven't already been built are developed, there is no need to plan for any additional sites in the upcoming Local Plan.

5.4.2 Should the commitments that haven't already been built remain undeveloped, the planned new district centre at Ipswich Garden Suburb, involving 2,000sq m net convenience goods floorspace, is capable of meeting the identified convenience goods quantitative need.

5.4.3 Accordingly, having regard to the foregoing assessment, the Council do not need to plan for any additional sites in the upcoming Local Plan Review to meet convenience goods needs in Ipswich Borough.

5.5 Can Upcoming Local Plan Review Sites meet identified Quantitative Comparison Goods Retail Floorspace Capacity?

5.5.1 The sites identified in the upcoming Local Plan Review (10,735sq m net) are capable of meeting the Borough's identified comparison goods floorspace capacity (including Copdock) after taking into account commitments/planning permissions (10,500sq m net).

5.5.2 It should be noted that at the time of the 2017 Retail & Leisure Study, planning permission existed for the change of use of the former Namco Funscape bowling alley to comparison goods retailing. An alternative planning permission (ref: 19/00064/FUL) has since been granted by the Council involving the demolition of the bowling alley, remodelling of Morrisons petrol station, refurbishment to the existing Morrisons store entrance and car park/access road improvements. Planning officers in the Council have confirmed to us that it is their understanding that this alternative Morrisons application is likely to be implemented and therefore the previous change of use application to comparison goods retailing should no longer be considered as a retail commitment/planning permission. We have therefore removed the previous change of use application from the commitments list. All of the other commitments/planning permissions identified in this update statement are now open and trading (see Table 16d, Appendix B, for list of commitments).

5.5.3 Having regard to the foregoing assessment, we therefore consider that the Council do not need to plan for any additional sites in the upcoming Local Plan Review to meet comparison goods needs in Ipswich Borough.

5.6 Overall Conclusions

5.6.1 Having regard to the analysis and findings in this statement we consider that the Council do not need to plan for any additional sites in the upcoming Local Plan Review to meet either the identified convenience or comparison goods needs in Ipswich Borough.