



# Planning and Retail Statement

Construction of a Class E Discount Foodstore  
and Associated Works

Holyhead Road, Coventry

March 2021

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**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

1.1 Avison Young is instructed by Lidl Great Britain (Lidl) to prepare this Planning & Retail Statement in support of an application for full planning permission for development comprising the construction of a new Class E limited assortment discount foodstore, car parking, access, landscaping and associated engineering works, on land forming part of the former London Taxi (LTI) site, Holyhead Road, Coventry.

1.2 The description of the proposed development is as follows:

*“Erection of a Class E limited assortment discount foodstore with associated car parking, access, landscaping and associated engineering works.”*

## The Application Site and Surroundings

1.3 The site extends to 0.911 hectares and is located to the north of Holyhead Road (A4114) approximately 1km to the north west of Coventry City Centre. This site was previously occupied by the former London Taxi (LTI) Manufacturing Plant, where the manufacturing and assembly of London Taxis took place (Use Class B2). The former buildings had been vacant for some time and have now been demolished by the landowner in readiness for the site’s redevelopment.

1.4 To the north is the cleared factory site and beyond that are residential uses. To the east, beyond the access road, is car dealership and to the south, a second car dealership. To the west are allotments. To the south of Holyhead Rd is the Alvis Retail Park, including large format retail units, a Morrisons supermarket and a drive thru restaurant.

1.5 The site is accessed via an estate road, which joins Holyhead Road via a four arm roundabout. The estate road also provides access to the Sytner Mini and Sytner BMW car dealerships, to the south and south east of the site, and will in future provide access to a future development to the north.

1.6 A planning application (reference FUL/2020/1141) has been submitted to CCC by the landowner for alterations and improvements to the estate road, which provides better pedestrian accessibility into the wider parcel of land and incorporates proposals by the City Council to improve cycle connectivity in this part of the City. The access details required for Lidl are as shown on the Proposed Site Plan submitted with this application. Otherwise the access details from Holyhead Road mirror that of application reference FUL/2020/1141.

## The Proposals

1.7 The proposals are shown on the Proposed Site Plan and comprise the following main elements:

- a foodstore of 2,279 sqm gross external area (GEA) with a net sales area of 1,410 sqm
- 117 car parking spaces including 7 accessible bays, 8 Parent & Child bays, 6 electric vehicle charging bays (2 rapid charger spaces and 4 fast charger spaces) and 18 cycle spaces.

- vehicular access; and
- hard and soft landscaping.

- 1.8 The Proposed Site Plan shows how the development will be arranged. The foodstore will be located along the western boundary of the site, orientated such that the glazed elevation faces southwards towards Holyhead Road. Car parking will be located on the eastern and southern sides of the building. Accessible parking and parent and child parking is provide close to the store entrance. Vehicular access for staff, customers and delivery vehicles will be via a new access to the estate road, which in turn provides access to Holyhead Road.
- 1.9 The foodstore will be single storey, with the warehouse located along the eastern elevation of the building, wrapping around to the northern elevation. The customer entrance will be located on the south-east corner of the building, providing easy access to the store for pedestrians. The entrance forms part of an attractive glazed elevation which runs the length of the southern elevation. A canopy provides definition and articulation to this façade, wrapping around to the eastern elevation and providing cover to both the trolley storage area and cycle stands. The canopy also serves to provide shelter to those entering the store, as well as to manage thermal gain within the building. The palette of materials utilised provides interest and a modern design, that is in-keeping with the materials and colours used in the surrounding commercial buildings.
- 1.10 Public transport access to the site is to a good standard, with a number of bus stops located along Holyhead Road. The closest bus stop is located within easy walking distance of the site and signalised crossings are available on Holyhead Road to aid pedestrian crossing. Cycle access to the site is also good and several improvements to the cycle infrastructure are proposed near to the site, including the provision of a 'cycle superhighway' which passes to the front (east) of the application site alongside the estate road serving the wider allocation (see Transport Assessment for further detail).
- 1.11 The store will be serviced via an enclosed loading bay on its northern elevation, so that all deliveries of goods to the foodstore, and the collection of waste from it, will be carried out within the building. There will be no movement or storage of waste in any outside area. Lidl's foodstores are typically served by 1 to 2 HGV deliveries per day. These deliveries take waste back to the regional distribution centre, helping to reduce the number of traffic movements at Lidl's sites and reducing emissions as a consequence. The number of deliveries may be higher at peak seasonal times but will remain, typically, no more than 2 to 3 per day.

### **Site Context and Adjacent Land**

- 1.12 The site forms part of a wider parcel of land that is allocated for residential redevelopment in the Coventry Local Plan (Proposal H2:12 - *Site of LTI Factory, Holyhead Road*). A planning application (reference FUL/2020/1142) has been submitted to CCC by the landowner on behalf of Persimmon for a residential development on dwellings on land to the north of this application site. A separate application (reference FUL/2020/1143) has also been submitted for an extension to the Sytner BMW multi storey car storage building. In addition, the aforementioned planning application (reference FUL/2020/1141) proposes amendments to the access road which would provide

satisfactory access to each of the three parcels independently or in combination. The three applications remain undetermined at the point of submission of this application. Together they will deliver comprehensive redevelopment of the allocated site. This is evident from the overarching 'Development Plan' which identifies each of the three development parcels and the associated infrastructure works.

### Submission Documents

1.13 Having regard to the nature of the development that is proposed, the location of the site, and the policy issues that are raised, this planning application is supported by the following documents, in addition to this Planning and Retail Statement:

- Architectural Plans prepared by Whittam Cox
- Design and Access Statement prepared by Whittam Cox
- Landscape Plan prepared by FPCR
- Flood Risk Assessment and Outline Drainage Strategy prepared by Baynham Meikle
- Transport Assessment prepared by PJA
- Travel Plan prepared by PJA
- Phase 1 Geo-environmental Report prepared by Wardell Armstrong
- Phase 2 Ground Investigation Report prepared by Wardell Armstrong
- Noise Impact Assessment prepared by Hoare Lea
- Lighting Plan prepared by Signify
- Lighting Results prepared by Signify
- Ecological Appraisal prepared by Focus Ecology
- Arboricultural Assessment prepared by Rob Keyzor
- Sustainable Buildings Statement prepared by DDA
- Energy Statement prepared by DDA
- Air Quality Assessment prepared by SLR
- Archaeological Desk-Based Assessment prepared by RPS.

1.14 The remainder of this Statement is structured as follows.

- **Section 2.0** explains the characteristics of the Lidl (Limited Assortment Discount) foodstore model.
- **Section 3.0** reviews the relevant content of the adopted Development Plan, evidence base and other material considerations, including national planning policy.
- **Section 4.0** provides our assessment of retail policy considerations.
- **Section 5.0** provides our assessment of the planning merits of the proposals and provides a summary of relevant technical and environmental matters.

- **Section 6.0** provides a summary of this statement and sets out our overall conclusions.

## 2. The Lidl Operational Model

2.1 Lidl is now exceptionally well established in the UK with the Company operating in excess of 800 stores from sites and premises both within and outside town centres. Its market share continues to increase substantially and the Company is expanding its store network considerably. The UK operational model is based firmly on the success of Lidl's operations abroad with more than 10,800 stores trading across Europe.

2.2 Lidl was characterised by the Competition Commission in its Groceries Market Investigation Final Report in 2008 as a Limited Assortment Discount (LAD) foodstore operator. The Commission said that LADs:-

*“carry a limited range of grocery products and base their retail offer on selling those products at very competitive prices. The three major LADs in the UK are Aldi, Lidl and Netto. Each ... carries in the region of 1,000 to 1,400 product lines in stores ranging from 500m<sup>2</sup> to 1,400m<sup>2</sup> (stores of a similar size operated by a large grocery retailer generally carry about 5,000 products). Aldi, in large part, carries only own label goods while both Lidl and Netto carry larger volumes of branded products”.*

2.3 The Commission, Inspectors and Secretary of State have expressly recognised that LADs offer particular benefits of quality and value. Lidl sells a limited number of product lines, but all of its business practices are aimed at driving down costs so that it can provide exceptional value for money across the whole of its product range. Whereas Lidl currently will typically sell no more than 2,000 product lines, the main grocers (Tesco, Asda, Sainsbury's & Morrison's) will sell 20,000, or considerably more, and the number of value lines that the main grocers stock is limited, whereas the whole of the LAD business model is geared to providing exceptional value.

2.4 Lidl offers discounted prices whilst keeping the quality of its goods extremely high, which it achieves through a combination of:-

- tremendous buying power as a result of the scale of its operations across Europe;
- a concentration on own brands (about 80% of its product range) which avoids passing on the cost of brand name marketing to the consumer;
- its decision to stock a much more limited product range than others, concentrating on those goods that form a very high proportion of the weekly food shopping needs of most households;
- operating systems that reduce operational costs; and
- simple product display and stock handling procedures.

2.5 The ability to offer a consistent range of high quality goods at competitive prices enables Lidl (and Aldi) to distinguish itself from other operators. The whole of the Lidl product range delivers value whereas the main grocers only stock own brand and 'value' lines amongst their branded and premium products.

2.6 Lidl does not stock convenience goods such as tobacco, or individual confectionary items and stocks limited pre-packed fish and meat and individual fruit and vegetable products. This places it in a different market from most independent retailers.

- 2.7 The same issues, coupled with the lack of post office, pharmacy, delicatessen, financial products or other in-house facilities mean that the overlap with conventional supermarkets is limited.
- 2.8 Lidl stores also offer a limited range of non-food items which typically occupy about 20% of the sales area. These items tend to be one off specials offered on the basis of 'when it's gone it's gone', with the range changing on a weekly basis. There is no standard or constant comparison goods range offered in store and the special items are wide ranging including anything from sports equipment to electrical items.

### **Implications for Planning Policy Considerations**

- 2.9 Delivering the LAD operational model has consequences for the design and layout of Lidl's stores. A critical component of the operational model is the size and configuration of the store which supports Lidl's stock handling procedures and the ability to stock its standard product lines in sufficient depth to minimise servicing costs. The restriction that this places on the ability of Lidl to be 'flexible' in its format is relevant to the sequential approach. This has been accepted by the Secretary of State and Inspectors in appeal decisions relating to Lidl foodstores, and by very many LPAs in their consideration of Lidl's applications.
- 2.10 In relation to a proposal in the London Borough of Merton in 2006 the Inspector concluded (and the Secretary of State agreed) that there 'are inherent characteristics of the Lidl business model that limit the scope for flexibility'. Those characteristics were cited as:-
- a store of a size that may accommodate all functions that form the business model
  - the need for a high proportion of sales relative to storage space
  - a need to enable efficient movement of palleted goods
  - the fact that Lidl stores concentrate on selling a limited range of primarily convenience goods which limits the scope for disaggregation.
- 2.11 In relation to an appeal at Cowley, Oxford in 2005 the Inspector concluded that Lidl's requirement of a minimum site and gross store size to accommodate its business model was "*reasonable for the purpose of the sequential assessment*". Subsequent decisions have reinforced these principles including in November 2013 in relation to an appeal in Huntingdon. The Inspector noted that "*the proposed foodstore and associated car parking would be designed to meet the requirements of the Lidl business model*". In relation to an existing unit which the LPA thought both available and suitable for a LAD foodstore the Inspector noted Lidl's position was that it is critical to its working arrangement that a store is rectangular with wide enough aisles to be able to control the sales floor, move pallets and keep costs to a minimum. Moreover, that Lidl's business model "*is not able to function without surface level car parking*".
- 2.12 Having regard to the requirement to demonstrate flexibility, and the evidence provided by Lidl, the Inspector concluded that the alternative store "*would be unsuitable for use by Lidl as a LAD foodstore, particularly as there appears to me to be limited scope or space to make significant changes to the layout or size of the building*".



- 2.13 As a consequence it was established that for Lidl to operate its business model it required at the time:
- a minimum site size of circa 0.46ha
  - a minimum net floorspace of 1,063m<sup>2</sup> on a single level; and
  - approximately 70 adjacent surface level parking spaces.
- 2.14 The Company continually looks to improve its store operating practices to ensure that it continues to meet the needs of its customers. Its most recent formats allow more flexibility with merchandising, and a brighter store with more room for customers to manoeuvre. The current requirements are as follows:
- a minimum site area of 0.8ha;
  - a minimum net floorspace of 1,325 sqm on a single level; and
  - a minimum of 120 adjacent surface level parking spaces.
- 2.15 Whilst Lidl's current requirements are for larger stores than previously, there is no material increase in the range of products displayed for sale. Instead the increased floorspace allows products to be stocked in greater depth (i.e. more of the same product may be stocked), ensuring that customers are more likely to find what they need in a single visit and ensuring that Lidl is better able to satisfy the needs of its customers.
- 2.16 In short, the change in preferred store format is based on the objective of securing operational efficiencies and providing a better environment for customers and has not implied any changes in the fundamental characteristics of the Company's operational model as defined by the Competition Commission.
- 2.17 In terms of impact, the limited product range stocked distinguishes Lidl from other retailers including main grocers (Asda, Morrison's, Tesco, Sainsbury's, Waitrose), freezer centres (Iceland) and multiple and independent convenience stores. Moreover Lidl caters primarily for bulk (or 'main') food shopping needs, rather than 'top-up' shopping (although Lidl foodstores do perform a top-up role also). Lidl does not compete, by virtue of its restricted product range, with town centre convenience stores or independent/multiple butchers, bakers and greengrocers.
- 2.18 The Inspector in the Huntingdon appeal concluded that because Lidl would represent:
- "a specialist discount foodstore, I find that there is insufficient evidence to show that it would cause any significant harm to [this] vitality and viability, particularly as it would not compete directly with the retail premises and would be complementary to the activities within the Town Centre".*
- 2.19 The store format is of a scale that falls below the 'default' threshold of 2,500 sqm (GEA) set out in the National Planning Policy Framework, above which an assessment of impact is automatically required. Coventry City Council has, however, adopted a lower, locally set threshold of 1,000 sqm meaning that, for the purpose of this application, an impact assessment is required. This is provided at Section 4.0 of this Statement.

### 3. The Development Plan & Other Material Considerations

#### The Development Plan

- 3.1 Applications for planning permission are to be determined in accordance with the Development Plan, unless material planning considerations indicate otherwise. The Development Plan for Coventry comprises the Coventry Local Plan 2011-2031 (adopted 2017) and the City Centre Area Action Plan ('AAP') (adopted December 2017). The application site falls outside the boundary of the AAP which is not, therefore, of direct relevance, except insofar as it may identify sites within the City Centre that may be relevant in relation to the application of the sequential test, which is considered at Section 4 of this Statement.

#### The Coventry Local Plan 2011-2031

- 3.2 The Coventry Local Plan sets out the long-term spatial vision for how the City will grow, develop and change, and how this vision will be delivered through a strategy for promoting, distributing and delivering sustainable development through to 2031.
- 3.3 The Local Plan is accompanied by an adopted Policies Map. The Policies Map shows that the majority of the application site forms part of a housing allocation under **Policy H2: Housing Allocations**. Table 4.2 of the Plan confirms that the site is part of allocation H2: 12 - *Site of LTI Factory, Holyhead Road* which is allocated for 110 dwellings. The remainder of the allocated site comprises the land which is subject to the current application for Persimmon Homes or the Sytner extension. That part of the application site which is not within the boundary of Site H2:12 is uncoloured and so is not subject to any specific designation or allocation.
- 3.4 **Policy DS1** covers 'overall development needs' across the City over the plan period (i.e. to 2031). It includes specific targets for new housing, employment land and retail floorspace. The Policy sets out the need for "21,900 sq. m gross convenience floor space by 2031, of which at least 70,000sq.m is to be allocated to Coventry City Centre". Table 5.2 of the Plan confirms that the requirement for convenience floorspace is anticipated to be 8,090 sqm (gross) by 2021 with a need for an additional 13,792 sqm (gross) between 2021 and 2031.
- 3.5 **Policy R1** allocates specific sites and areas to support the provision of the retail floorspace required across the City, which is to be delivered in accordance with other policies within the Local Plan and the City Centre AAP as appropriate. The requirement is distributed around the City Centre, a new Eastern Green Major District Centre (MDC), Cannon Park MDC, new Local Centres for Keresley, and Brade Drive and Jardine Crescent District Centres. New foodstores are explicitly mentioned only in the City Centre and the new Eastern Green MDC (although an appropriate amount of convenience goods floorspace is clearly not precluded in any centre).
- 3.6 **Policy R3** sets out the retail hierarchy of centres within Coventry as follows:
- City Centre Primary and Secondary Shopping Areas, followed by the wider City Centre;

- **Major District Centres:** comprising Arena Park, Cannon Park, Brandon Road and Eastern Green which are expected to include a mix of *“bulk convenience and comparison shopping”*;
- **District Centres:** comprising Ball Hill, Bell Green, Brade Drive, Daventry Road, Earlsdon, Foleshill, Jardine Crescent and Jubilee Crescent which are expected to include provision which will support the needs of their district of the City for bulk convenience shopping; and
- **Local Centres:** of which there are 25 identified in policy and which are expected to cater for day-to-day convenience shopping needs.

3.7 Having regard to the policies of the plan and Policies Map, and applying the relevant definitions in the NPPF, the site is considered to be ‘out-of-centre’ for purpose of the application of retail policy so that it is necessary under the sequential test to consider whether there are any more centrally located sites that are suitable and available to accommodate the development that is proposed, adopting a flexible approach to matters such as format, scale and parking requirements. We note later that the scope for adopting a flexible approach is legitimately constrained in this case having regard to the specific operational requirements (as opposed to operational preferences) of the Limited Assortment Discount foodstore model.

3.8 **Policy R4** relates to ‘Out of Centre Proposals and, in addition to requiring that a sequential test is undertaken, requires that proposals for new retail floorspace in excess of 1,000sqm (gross) be supported by an ‘Impact Test’ (or quantitative impact assessment) to consider the potential impact of the development on the vitality, viability, role and character of a defined centre(s) as set out in policy R3. An ‘Impact Test’ has been prepared and is provided at Section 4 and Appendix 1 of this Statement.

3.9 Other policies of relevance include **Policy DE1**, which seeks high quality design, and, in addition:

- **Policies AC1, AC2, AC3 and AC4** which require that development should provide safe vehicular and pedestrian/cyclist access, and should not impact harmfully on the highway network;
- **Policies EM1 and EM2** which seeks to ensure that buildings are resilient to climate change’
- **Policies EM4, EM5 and EM6** which seek to ensure that proposals incorporate SUDs features and are not impacted by flood risk, or increase flood risk elsewhere, and do not impact on water quality; and
- **Policy EM7** which requires that proposals should not impact harmfully on air quality.

3.10 The Council’s maximum parking standards are also set out within the Plan. For an A1 (now Class E) convenience proposal in the ‘outer city’ zone, 1 car parking space per 25 sqm (gross) of floorspace is required. In addition 5% of spaces should be electric and 5% to be accessible. In respect of cycle parking, for proposals under 2,500 sqm (gross) 1 cycle space per 200 sqm of floorspace is required, plus 1 space per 400 sqm for staff. Further consideration to highways matters is provided in the Transport Assessment prepared by PJA.

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## **Other Material Considerations**

### **The National Planning Policy Framework**

- 3.11 The NPPF was published in February 2019 and sets out the government's planning priorities for England. Underpinning the NPPF is the presumption in favour of sustainable development. This must be applied to both plan-making and decision-taking and reflects a desire for the planning system to positively and proactively support sustainable economic growth. In this regard, Lidl's proposal is for economic development and will deliver employment opportunities at the local level.
- 3.12 The NPPF adopts a 'centres first' approach to the location of new retail development. The objective is to promote competitive town centre environments on the basis that town centres generally lie at the heart of communities so that their vitality and viability should be supported.
- 3.13 Paragraphs 86 and 87 confirm that LPAs should apply a sequential test to applications for main town centre uses not in an existing centre and not in accordance with an up to date local plan. It confirms also that flexibility must be demonstrated by applicants and LPAs in respect of store format and scale. Applicants should consider the opportunity to deliver their services in, for example, reduced or non-standard store footprints and with reduced levels of parking. A sequential test has been undertaken and is provided at Section 4.0 of this Statement.
- 3.14 In relation to the assessment of impact arising from applications for main town centre uses that are not in a centre, paragraph 89 confirms that the default threshold for requiring an impact assessment is 2,500 sqm (GEA) or any lower, locally set threshold. Coventry City Council has adopted a lower, locally set threshold for the City of 1,000 sqm (gross) in the Local Plan and so an 'Impact Test' has been undertaken and is provided at Section 4 of this Statement.
- 3.15 Other policies in the NPPF relating to design, transport and sustainable development issues are relevant to this application. Those matters are dealt with in supporting documents submitted with this application, the conclusions of which are summarised in this Statement.

### **Supplementary Planning Documents**

- 3.16 The LPA has several adopted Supplementary Planning Documents (SPDs) which provide additional detail in respect of various technical, environmental, design and policy based issues. The Coventry Connected SPD (2019) and the Air Quality SPD (2019) designate the whole of the City as an Air Quality Management Area (AQMA) and are therefore of relevance to this application. The relevant provisions of these documents are addressed within the Design and Access Statement, Transport Assessment, Travel Plan and Air Quality Assessment respectively.

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## Evidence Base

- 3.17 The Council's retail evidence base comprises the *Shopping and Centres Study (2014)* and the *Local Centres Assessment (2015)*. The latter offers some useful data and information on the composition of the Local Centres at the time that it was prepared, which allows some comparison to be made between the composition of centres at the time and their composition now, supporting a review of their 'health' against key indicators relating to the mix of comparison and convenience goods floorspace, the presence of other uses and also any changes to the vacancy rate in each centre over time.
- 3.18 In 2014 the Council appointed Nathaniel Lichfield & Partners (NLP) to update its Shopping and Centres Study. The Shopping and Centres Study provides a quantitative and qualitative analysis of the existing retail and leisure facilities across the City and includes an assessment of the need for new retail, leisure and other main town centre uses in the City over the period to 2031
- 3.19 The Shopping and Centres Study established that approximately 10,066 sqm (gross), or 7,046 sqm (net), of food and convenience floorspace could be supported in the City by 2021. It also estimated that an additional 16,409 sqm (gross), or 11,487 sqm (net), of food and convenience floorspace could be supported in the City as a whole by 2031.
- 3.20 Paragraph 3.74 advises that:-
- "The short to medium term capacity figures up to 2021 suggest surplus available convenience goods expenditure could support an additional 3,106 sqm net (4,438 sqm gross), in Coventry SW and Coventry NW. There is no need identified for additional floorspace in Coventry NE or Coventry SE. In the long term surplus expenditure at 2031 could support 10,856 sqm net of sales floorspace (15,509 sqm gross) in Coventry as a whole, as shown in Table 11, App 2".*
- 3.21 We note that the application site lies on the boundary of the Coventry Urban North West and Coventry Urban South West 'zones' (but within the South West zone according to its postcode), in which the evidence base identified surplus expenditure at all assessment dates. In the South West zone additional gross floorspace requirements are noted as 7,484 sqm 2014-2021, 1,730 sqm 2021-2026 and 1,818 sqm 2026-2031. We are not aware of any significant additional commitments or new floorspace having been delivered in the SW area of the City since then.
- 3.22 The Study advises also that the level of floorspace required "*represents about 3 to 4 new large food stores*" across the City by 2031, assuming that those stores trade at 'company average turnover levels' (which we assume relates to a basket of sales densities). A caution is also placed on the impact of such provision if all were to be provided out of centre. It appears from the Council's monitoring data that this level of provision has not been delivered.

## 4. Assessment – Retail and Centres Policy

### Introduction

- 4.1 We have established by reference to the Coventry City Local Plan Policies Map that the site is located outside of any designated centre, is not within 300 metres of any designated centre, and is therefore an ‘out of centre’ site for the application of retail policy.
- 4.2 We have noted also that whilst the proposal is for less floorspace than the 2,500 sqm (GEA) threshold above which the NPPF (2019) confirms that it will always be necessary for an impact assessment to be undertaken, Coventry City Council has set a lower threshold and, accordingly, there is a requirement for an impact assessment to be carried out in support of this application. Our assessment of impact (or ‘Impact Test’) is supported by a general commentary on the potential for impact, based on a review of the composition and ‘health’ of relevant centres within Coventry, and on identification of the food and convenience operators present, and the extent to which those may anchor the centres.
- 4.3 There is no floorspace threshold beneath which is not necessary to assess proposals for out-of-centre retail development against the sequential approach. Consequently we have considered whether there are any more centrally located opportunities that are both suitable and available and which could accommodate the development that is proposed, adopting a flexible approach.

### The Network of Centres

- 4.4 Local Plan Policy R3 sets out the hierarchy of centres within Coventry. We have determined the relevant centres for the purpose of the sequential test by reference to what is assumed to be the ‘primary catchment’ of the proposed foodstore. This is based on the extent of a 5-minute off-peak drive time isochrone, which is appropriate for a proposal in a mature and densely populated urban location. We have concluded that those centres which are either within, or very close to, the extent of the isochrone are as follows:
- Coventry City Centre
  - Earlsdon District Centre.
  - Barker’s Butts Lane Local Centre
  - Radford Road Local Centre
  - Holyhead Road Local Centre
  - Winsford Avenue Local Centre
- 4.5 Avison Young visited and undertook a high-level ‘health check’ of each of the relevant centres in August 2020. We used the findings of the Retail Study (2014), and the data relating to the composition of the local centres as set out within the Local Centres Assessment (2015), as the basis of our review of their health and composition, and referred also to the latest pre-Covid-19 GOAD data for comparison purposes. The results of those visits are

set out below. Given circumstances around Covid-19 these findings are treated cautiously, however the health checks were undertaken in a robust manner and at a time when Government restrictions had been lifted, and the country was not in full lockdown, allowing operators to open for business if they wished to do so. Whilst our surveys were over six months ago, there is no merit in updating them at this time, given that non-essential shops remain closed during the latest national lockdown.

### Coventry City Centre

- 4.6 Coventry City Centre is located at the top of the centre hierarchy as the main shopping destination in the City, as well as being the focus for employment, leisure, entertainment and cultural activities. The centre boundary and the Primary Shopping Area boundary are defined on the Policies Map.
- 4.7 In December 2017, the City Council adopted the City Centre AAP. The AAP is relevant insofar as it defines the Primary Shopping Area (PSA) within the City Centre, as required by national guidance, and also identifies a number of potential development opportunities and allocations, which we return to later. **Policy CC18** states that the PSA *“will be the principal focus for all new shopping developments including redevelopment, refurbishment, extension or conversion of buildings for shopping uses.”* The policy expects at least 40,000 sqm of new floorspace for Use Classes A1-A5 to be delivered in the PSA over the plan period. The policy also recognises an opportunity to deliver a new purpose-built convenience food offer (10,000 sqm) *“within or in close proximity to the PSA”*.
- 4.8 The 2014 Retail Study reviewed the composition of the City Centre at the time and noted that its strengths included that the centre provided a reasonable range and mix of both national multiple retailers and independent comparison retailers; had a number of anchor department stores, attracting customers to the city centre, a good range and choice of non-retail services including food and drink establishments (and a thriving evening economy), and that the centre is easily accessible by public transport. Its weaknesses included that for a city of its size, the centre has a low proportion of comparison goods retailers, and that the centre’s vacancy rate is higher than the national average, suggesting weak demand.
- 4.9 The Local Plan notes in Section 5 that the City Centre will remain at the top of the centres hierarchy as the main comparison shopping destination and main focus for employment, leisure, entertainment and cultural activities. It notes that investment within the city centre has not kept pace with development in some of the city’s district centres and retail parks or competing towns and cities, highlighted by it ranking 58th on the Venuescore database. This underlines the *“need to invest in the city centre retail based regeneration schemes at City Centre South, Friargate and, in time, City Centre North as well as by provision of a new food superstore to support the city centre. These matters are considered further in the City Centre AAP (pages 8 and 9) and inform the aspiration of the ‘Coventry City Centre – Development Strategy’ (Policy CC1). The supporting text goes on to emphasise the “strategic ambition” to provide a new convenience offer within the City Centre and says that the allocation of 10,000 sqm gross floor space should in the first instance be directed towards the PSA “either as part of City Centre South or later regeneration projects”.*

- 4.10 We visited the centre in August 2020. Our survey area was based on the GOAD map for Coventry, as per the methodology within the 2014 Retail Study. The survey area includes the designated Primary Shopping Area, and some additional areas of the City Centre, all located within the ring road. Within this geography our survey found that in total, the City Centre retail offer comprised the following mix of uses (defined by reference to their former use class classifications):
- 230 shops (formerly Use Class A1);
  - 64 professional services (formerly Use Class A2);
  - 72 cafes and restaurants (formerly Use Class A3);
  - 32 drinking establishments (formerly Use Class A4);
  - 26 takeaways (formerly Use Class A5);
  - 21 units in Sui Generis uses (including casinos, betting shops, nail salons and beauty salons);
  - 36 offices (formerly Use Class B1(a));
  - 4 hotels (formerly Use Class C1);
  - 18 non-residential institutions, including museums, libraries and churches (formerly Use Class D1);
  - 21 assembly & leisure uses, including bingo halls, community spaces and cinemas (formerly Class D2); and
  - 96 units that were vacant or undergoing alteration.
- 4.11 Having regard to the mix of uses above, approximately 37% were in retail (former Class A1) use and 4.19% of the total units within the centre were in convenience use. Within the City Centre boundary, food and convenience provision primarily comprised Sainsburys at Hales Street and Iceland at Queen Victoria Road. We noted also a Tesco Express at Shelton Square, a Nisa at Hales Street, and a Marks and Spencer foodhall at The Precinct.
- 4.12 We visited all five foodstores on a weekday morning, and again at lunchtime, and found the stores to be trading well, with good levels of footfall, particularly the Tesco Express. Neither Sainsburys nor Iceland have dedicated car parking, but both appeared to be trading well. Sainsburys offers an in-store bakery, delicatessen and hot food counter, and a coffee bar, as well as an extensive range of convenience goods. The M&S also includes a bakery, but both the M&S and the Nisa cater primarily for 'top-up' shopping.
- 4.13 Our survey found that, since the last GOAD survey in September 2019, 50 units had changed use class (adopting the former use classes that were operative at the time of the last GOAD survey). We noted that 13 additional restaurants/cafes were now operating, suggesting that there had been a diversification of uses within the centre. Our survey also found that the vacancy rate for the centre was 15.5% by number of units, which was similar to the 14.8% rate identified in 2014 in the Retail Study, although higher than the national average which, in March 2020, was 12.2% (Local Data Company, 2020). It is unclear whether the vacancy rate within the centre had been impacted by Covid-19, although we noted that the units were dispersed widely around the centre rather than being concentrated in any location. We noted also that the number of vacant units had decreased by 4 following the latest GOAD survey.



- 4.14 The centre is also supported by an extensive, permanent Market, which provides a wide range of convenience and comparison stalls. The market operates Monday to Saturday, with varying hours.
- 4.15 The environmental quality of Coventry is overall very good. The Lower Precinct and West Orchards Shopping Centres provide attractive shopping locations and recent investment in Cathedral Lanes since 2014 has also improved the restaurant and bar offerings in the city centre. The majority of the centre is pedestrianised and there are a number of squares and green spaces. Pedestrian and cycling accessibility throughout the centre is good, with crossings easily available in areas that are not pedestrianised. Significant investment has now been provided across the city to improve those areas of public realm and publicly accessible buildings which could do with some refurbishment, which is understood to be due in part to Coventry's City of Culture status in 2021. These works were underway and evident in August 2020. Demolition of the Coventry Point tower blocks was also evident, understood to be the first steppingstone in progressing redevelopment of City Centre South – a large regeneration aspiration for the city.
- 4.16 The centre is also easily accessible by bus via the bus station and with stops throughout the centre. Coventry railway station is also within easy walking distance of the city centre, or with links provided by bus. Further detail on accessibility is provided within the Transport Assessment.
- 4.17 In summary, we consider that Coventry city centre performs well against those vitality and viability indicators which we have considered, and that the position has remained consistent in recent years. At the same time, we acknowledge the strengths and weaknesses set out in the evidence base, the Local Plan and the City Centre AAP, including the 'strategic ambition' to deliver a new 'food superstore' in the centre over the lifetime of the development plan.

#### **Barker's Butts Lane Local Centre**

- 4.18 Barker's Butts Lane local centre is the closest defined 'town centre' to the application site and lies at the junction with Moseley Avenue (around 350 metres to the north of the application site). The centre comprises traditional units either side of the road around a busy crossroads, wrapping on to Cramper's Field. The majority of units have residential uses above.
- 4.19 Whilst located on a busy crossroads, pedestrian permeability is assisted via signalised pedestrian crossings. The centre has limited roadside parking, but is considered likely to have a significant walk-in catchment.
- 4.20 Avison Young visited the centre in August 2020 and our survey found that the centre offered:
- 22 shops (formerly Use Class A1);
  - 4 professional services (formerly Use Class A2);
  - 2 cafes and restaurants (formerly Use Class A3);
  - 5 takeaways (formerly Use Class A5);
  - 1 office (formerly Use Class B1(a));

- 1 non-residential institution (formerly Use Class D1);
- 2 assembly and leisure uses, including Rialto Plaza (formerly Use Class D2);
- 3 units in Sui Generis use; and
- 4 vacant units.

4.21 The mix of units within the centre was as expected for a centre of this size, serving a primarily walk in catchment. Our survey found that out of a total of 44 units, 4 were vacant, representing a vacancy rate of 9% which is below the national average of 12.2%.

4.22 The main convenience store in the centre is a Nisa Local. This is a small store with a limited range of groceries, serving a top-up food shopping function.

4.23 In summary we consider that the centre is performing well in its role having regard to our observations and the vitality and viability indicators which we have considered.

#### **Radford Road Local Centre**

4.24 Radford Road local centre lies on the northern edge of the primary catchment of the proposed foodstore and extends between Lydgate Road and the Buzz Bingo hall on its northern edge. It lies around 1km from the application site. The centre comprises units either side of the road, many with residential uses above.

4.25 Our survey of the centre in August 2020 found 18 Class A1 shops, along with 7 take-aways. There was no substantive convenience provision within the centre boundary (within Aldi being located outside its boundary). At the time of our visit to the centre included 37 units, two of which were vacant (5.4%).

4.26 In summary we consider that the centre was performing well in its role in the hierarchy having regard to our observations and the vitality and viability indicators which we have considered.

#### **Holyhead Road Local Centre**

4.27 Holyhead Road local centre lies to the north-west of the application site and comprises a parade of retail and service units on the southern side of Holyhead Road, along with a detached Tesco Express at the northern edge of the centre. The main part of the centre comprises three storey accommodation with commercial uses at the ground floor and with residential accommodation above. Our survey of land uses in the centre in August found:

- 8 Class A1 retail stores
- 2 estate agents
- 1 café
- 3 take-aways
- 3 units in sui generis use
- 2 vacant units.

4.28 Convenience provision is primarily provided by the Tesco Express store which is served by a small surface level car park (12 spaces) and which offers a reasonably wide range of fresh and ambient goods. Given its size and location, we consider the Tesco is likely to cater mainly concentrate on top-up food shopping trips. At the time of survey, the store was busy with a combination of drive-in and walk-in trade. There is also a butcher in the main part of the centre.

4.29 In summary we consider that the centre is performing well in its role according to our observations and having regard to the vitality and viability indicators that we have considered.

#### **Winsford Avenue Local Centre**

4.30 Winsford local centre lies at the junction of Winsford Avenue and Whitaker Road, around 1.9km west of the application site. It comprises a purpose-built shopping parade served by a surface level car park area in the southern part of the centre, adjacent to which is the largest retail unit in the centre, which is occupied by a Nisa Extra convenience store. This store sells a modest range of ambient and fresh/frozen goods along with beers, wines and spirits. Given the size of this store, it is likely to serve primarily top-up food shopping needs. Overall, there are 20 units in the centre with no vacancies in the centre at the time of survey.

4.31 In summary the centre appears to be performing well having regard to our observations and in respect of the vitality and viability indicators which we have considered.

#### **Earlsdon District Centre**

4.32 Earlsdon district centre is a large linear centre between Earlsdon Avenue North/South and Providence Street, with retail, service and commercial uses accommodated mainly in terraced properties on either side of the street.

4.33 The centre has the feel of a pleasant high street. The roads through the centre were lightly trafficked at the time of our visit, and there is a good range of cafés, bars and pubs which use the pavements to provide outside space. Some national retailers were present including Greggs, Boots and the Co-op. There are residential units above most of the shops.

4.34 Our survey found that the centre comprised:

- 26 shops (formerly Use Class A1);
- 3 professional services (formerly Use Class A2);
- 9 cafes and restaurants (formerly Use Class A3);
- 3 drinking establishments (formerly Use Class A4);
- 2 takeaways (formerly Use Class A5);
- 4 non-residential institutions, including a library and churches formerly (Use Class D1);
- 3 units in Sui Generis use, including a beauty salon and a launderette; and
- 7 vacant units.

- 4.35 Our survey found that out of a total of 57 units, 7 were vacant (12.3%). This is in line with the national average of 12.2%.
- 4.36 The largest foodstore in the centre is a Co-op located towards the northern end of the centre and which extends to circa 600 sqm (net). It does not have a dedicated car park. The store sells a reasonable range of fresh, frozen and ambient convenience goods. The Co-op does not have a dedicated car park and whilst shoppers can park on surrounding streets, we consider that this store is likely to have a reasonably high level of walk-in trade. In addition to the Co-op, convenience goods shopping also includes a One Stop convenience store which, due to its size (140 sqm net) serves a small scale top-up food shopping function.
- 4.37 In summary we consider that the centre is performing well in its role and having regard to our observations and the vitality and viability indicators that we have considered.

### **General Potential for Impact**

- 4.38 In accordance with the requirements of policy in the Local Plan we have carried out an 'Impact Test' by way of a quantitative assessment of trade diversion and impact. Before reviewing the conclusions of the quantitative assessment, we set out first the following general observations on the propensity for harmful impact to arise in this case.
- a) We noted in Section 2 that the Lidl operational model operates on the basis of a restricted range of convenience goods which distinguishes Lidl from other retailers, including the main grocers (Asda, Morrison's, Tesco, Sainsbury's and Waitrose), freezer centres (such as Iceland) and multiple and independent convenience stores. We note also that Lidl's primary trade is in main food shopping, rather than top-up shopping.
- b) Adopting the well-established principle that "*like competes with like*" this means that Lidl does not tend to compete with town centre convenience stores, or independent/ multiple butchers, bakers and greengrocers. Indeed, the Inspector in the Huntingdon appeal concluded that, because Lidl would represent a specialist discount foodstore:
- "I find that there is insufficient evidence to show that it would cause any significant harm to vitality & viability particularly as it would not compete directly with the retail premises and would be complementary to the activities within the Town Centre".*
- c) Moreover we have noted that Coventry city centre is performing well, according to the indicators of vitality and viability that we have reviewed, and we have noted the lack of convenience floorspace provision in the city centre with which this proposal might compete. Similarly, we have noted that the relevant District and Local Centres are also performing well in their roles, that they are not anchored by medium sized foodstores catering for 'main food' shopping, but do contain convenience stores which and are capable of meeting 'top-up' needs and with which the proposed development will not primarily compete.

- d) The main foodstores closest to the application site also appear to be trading well; notably Morrisons which is located in an 'out-of-centre' location in close proximity to the application site.
- e) The evidence base concludes that, whilst need is no longer a test, there is capacity for additional convenience floorspace of up to 4 foodstores in the City as a whole by 2031, with that focused on the Urban North West and Urban South West zones, with the application site being located on the northern edge of the South West zone.

4.39 These points support a general conclusion that the propensity for significant adverse impacts to arise on Coventry city centre or any of the Local or District Centres is low.

### **Quantitative Impact Assessment**

4.40 The NPPF advises that in circumstances such as this, where an application is for retail development outside any designated centre and on a site not allocated for retail purposes (and with a locally set threshold of less than 2,500 sqm GEA) there is a requirement to carry out an impact assessment. This should include an assessment of:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
- the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme)

4.41 We deal with each in turn below.

### **Impact on 'Town Centre' Investment**

4.42 As outlined in the NPPF (and supported by the 2017 Local Plan) the first limb of the 'impact' test is to consider the potential for impact on existing, planned or committed town centre investment. Part 3(b) of Local Plan Policy R4 indicates that the catchment area for the impact test will be determined on a case by case basis, and to reflect the specifics of the proposal being considered. The focus is usually on what would be considered to be the 'primary catchment' of the proposal. In this instance, the proposal is for a medium sized discount foodstore to be located in a mature and densely populated urban area so that we would expect its 'primary catchment' to be quite localised and to equate broadly with an area defined by a 5 minute off-peak drive-time isochrone. This extends to part of the City Centre, to Earlsden District Centre, and to a number of local centres.

4.43 With regards to the nearby District and Local Centres, we are not aware of any committed and/or planned investment which could be materially affected by the proposed foodstore at the application site.

4.44 In relation to existing investment in nearby District and Local Centres, we do not think that the proposed foodstore is likely to materially affect business confidence/sentiment, or to have an impact on on-going investment decisions. The vast majority of the retail, service and other commercial businesses in the nearby District and Local

Centres will not be affected, because the proposed foodstore will not be offering the same goods and services as those businesses. The centres have a relatively limited food and convenience offering which is orientated towards meeting the 'top-up' and day-to-day needs of local residents, whereas the proposed Lidl will primarily serve main food shopping needs. These stores and centres already trade alongside large foodstores and supermarkets in this part of the City, and the introduction of the proposed Lidl foodstore will not materially change this situation.

- 4.45 Finally, there is a need to consider whether there will be any effect on existing, planned or committed investment in the City Centre. With regards to planned and/or committed investment in the city centre, Policy R1 of the adopted Local Plan proposes around 70,000 sqm (gross) retail floorspace which will be delivered through the adopted AAP at City Centre South, City Centre North, Friargate, plus the proposed city centre supermarket. Policy CC18 of the adopted AAP notes that:

*“Opportunities to provide a new purpose built convenience food offer of up to 10,000 sq.m within or in close proximity to the PSA will also be encouraged” with the supporting text noting that “Through this AAP and the Local Plan a **strategic ambition** has been identified to provide a new convenience offer within Coventry city centre to help support the centre’s overall draw and to support increased city centre living and sustainable shopping patterns. As such, opportunities to provide an enhanced convenience food offer within the city centre will be encouraged. To support this, an allocation of 10,000 sq.m gross floor space has been identified. This should in the first instance be directed towards the primary shopping area either as part of City Centre South or later regeneration projects. If this does not prove practical, then it should be delivered within the wider City Centre at a location that is well connected and easily accessible to the primary shopping area”.*

- 4.46 The AAP does not identify a particular site to accommodate the “strategic ambition” to deliver this floorspace, and no proposal has come forward over the past several years to meet this requirement. In addition, the City Centre South redevelopment project has not progressed, and that would be unaffected in any event as it is based primarily on comparison goods and food/beverage floorspace.
- 4.47 In relation to existing investment, whilst the city centre accommodates a range of convenience goods retailers, we would not expect the proposed Lidl to impact on their continued presence. Moreover, whilst important elements of the City Centre offer, they do not underpin the health of the City Centre, which is dominated by comparison retail and service uses. In any event, convenience retail uses in the centre will benefit from the high levels of footfall generated by the attractiveness of this centre as a shopping and service use destination.

#### **Impact on 'Town Centre' Vitality and Viability**

- 4.48 When considering the likely impact of the proposed foodstore on nearby 'town centres' a number of factors should be taken into account, including:
- a) the direct financial impact of the proposed retail floorspace;
  - b) the scale of trading overlap with nearby centres; and

- c) the comparative role and function of the proposal in contrast to the role and function of nearby centres and edge/out of centre stores in the city.

4.49 With regards to the assessment of financial impact, it is common for such assessments to be based upon data within a Local Authority's retail and town centres evidence base library. In this instance, the most recent evidence provided by the City Council can be found in the Coventry City Wide Shopping and Centres Study 2014 (prepared by Nathaniel Lichfield and Partners for the City Council, 11<sup>th</sup> December 2014). The 2014 Study provided an assessment of convenience and comparison goods shopping patterns and an assessment of the quantitative capacity for net additional Class 1 retail floorspace in the city.

4.50 However, whilst a survey of household shopping patterns was commissioned for that study, the results were not included in the published report and they were also not summarised in the quantitative assessment of retail expenditure capacity in relation to the market share of convenience and comparison goods stores and centres across the city. As a consequence, the content of the 2014 Study does not offer any useful contribution to this financial impact assessment and our requests for copies of the raw evidence base data informing the study have not resulted in receipt of any useful evidence.

4.51 Consequently, we have adopted the same approach as the current proposal at Unit 6, Alvis Retail Park, Holyhead Road (reference FUL/2020/0724) which examines likely financial impact based upon average trading performance levels. This provides consistency with the Alvis Retail Park proposal (which includes the ability to accommodate a foodstore use).

4.52 Our financial impact assessment tables are contained in Appendix I and are structured as follows:

- Table 1: turnover of the proposed retail store
- Table 2: turnover of existing stores and centres
- Table 3: trade diversion to proposed retail store

4.53 In preparing this financial impact analysis, the following data sources and assumptions have been adopted:

- The turnover of existing stores and centres has been calculated using floorspace data adopted by the City Council's 2014 retail study and average sales density performance levels provided by GlobalData.
- The turnover of the proposed foodstore is based upon the net sales area given in the submitted planning application form (1,410 sqm net) and it has been assumed that 80% of the net sales area will be devoted to the sales of convenience goods, with the remaining 20% selling comparison goods.
- Given that a large majority of the proposed retail sales floorspace is proposed to sell convenience goods, our assessment concentrates upon this element of the proposed store. Lidl's comparison offer is limited, operating on the basis of "when it's gone it's gone" and with no permanent lines of comparison goods, such

that any impact would be limited and transient week to week. The pattern of forecast convenience trade diversion to the proposed store is based upon the location and retail offer of competing foodstores.

- All financial figures are provided in 2018 prices.

4.54 Given the scale and location of the proposed foodstore, along with the scale and location of competing foodstores, it is our view that that its primary catchment area will be focused upon a five minute drive time. This is shown in Figure [4.1] below.

*Five minute drive time from application site*



4.55 The centres within the area shown in Figure 4.1 above are Barker's Butts Lane, Radford Road and Holyhead Road. In addition, Earlsdon District Centre lies a short distance from the southern edge of the catchment, and Winsford Avenue local centre lies close to the western edge. Foodstore provision in these centres has been reviewed earlier in this chapter. In addition, it should be noted that there are larger District Centres further afield in the surrounding area, including Brandon Road, Arena Park, Bell Green, Jubilee Crescent, Jardine Crescent and Cannon Park, whilst the City Centre lies to the east of the application site. Whilst these additional centres do not necessary lie in the primary catchment of the proposed store, some of these centres, with larger-scale foodstore/supermarket provision, may also have an influence on convenience goods shopping patterns in the surrounding area.

4.56 In addition to the above defined 'town centres', there are two edge/out of centre stores in the locality which will also have an influence on convenience goods shopping patterns. These are:

- **Morrisons, Holyhead Road** (3,618sq m net) which lies a short distance from the application site. It sells a wide range of convenience goods, supported by a modest range of comparison goods. The store is served by a large surface level car park and petrol filling station and is located adjacent to Alvis Retail Park. Given its size, this store is likely to serve both main and top-up food shopping trips and is likely to be the main source of trade diversion for the proposed store.



- Aldi, Radford Road. This store is the closest discount foodstore to the Lidl application site. It lies to the north and is a short walking distance to the northern edge of Radford Road local centre.

### Assessment

4.57 Table 3 at **Appendix I** outlines our Assessment of financial impact and the main sources of trade diversion can be summarised as follows:

Centre	Trade Diversion	Impact
Coventry city centre	£0.63m	-0.9%
Arena Park district centre	£0.23m	-0.3%
Canon Park district centre	£0.8m	-1.5%
Brade Drive district centre	£0.1m	-0.2%
Jubilee Crescent district centre	£0.11m	-0.7%
Binley Road district centre	£0.06m	-0.5%
Earlsdon district centre	£0.11m	-1.7%
Holbrook Lane local centre	£0.2m	-0.7%
Daventry Road district centre	£0.23m	-2.2%
Aldi, Radford Road	£2.1m	-33%
Morrisons, Alvis Retail Park, Holyhead Road	£4.8m	-12.2%
Lidl, John Wigley Way	£0.2m	-3.2%
Sainsburys, Fletchamstead Highway	£0.7m	-1.4%
Other stores in the western side of the city centre	£0.6m	

4.58 As Table 3 and the above show the largest likely levels of trade diversion are in relation to the nearby large Morrisons supermarket and the Aldi store on Radford Road. Neither of these stores lie within a defined 'town centre' and therefore the likely impact upon them is not a planning policy consideration.

4.59 In terms of the forecast likely impact upon defined 'town centres', our assessment shows that there are low levels of impact in relation to specifically identified district centres outside of the assumed primary catchment area of the proposed store. Generally, the levels of trade loss are no more than -2%, and many are no more than -1%. The low levels of forecast trade loss, and the resultant conclusion that there need be no concern over future viability are, in our opinion, a combination of three main factors:

- a) the much higher proportions of diversion from closer large foodstores/supermarkets;
- b) the differentiated trading function of any convenience goods stores in these centres; and
- c) the successful trading performance of the larger supermarkets in these centres.

4.60 As noted above, there are some other smaller Local Centres within the likely primary catchment area of the proposed store, along with a couple of additional centres close to its edge. Table 3 indicates that the likely impact upon Earlsdon will be around 2%, which will be focused upon the Co-op store on Earlsdon Street. The Co-op store

is far enough away from the application site, along with a differentiated shopping function (i.e. top-up food shopping), to clearly suggest that there is no material threat to its future viability.

4.61 In relation to the other nearby local centres (Barker's Butts Lane, Holyhead Road, Radford Road and Winsford Avenue), the forecast level of diversion will be part of the £0.6m diversion from 'other' stores shown towards the bottom of Table 3. Whilst it is likely that not all of this £0.6m will come from these four local centres, there is no particular concern over their future viability and health because;

- a) when spread across these centres (and stores in the wider area) the actual level of trade loss will be, at worst, minimal, and in many case non-existent; and
- b) the role and function of stores in these local centres (i.e. focused upon top-up) is materially different to the proposed store which will be much more focused upon main food shopping trips/expenditure. Also, it should be noted that, in many of these centres, they are not under-pinned by a foodstore offer. These local centres offer a diverse range of uses, including many services, which have no trading overlap with the proposed foodstore.

4.62 Overall, our analysis has shown that the likely impact of the proposed foodstore upon the role, function and health of nearby local centres will not be material (and very limited), due to their materially different trading function and we would expect the majority of trade diversion to the proposal to come from nearby larger foodstores/supermarkets which lie outside of defined 'town centres'. As a consequence, there is no evidence that there is likely to be any conflict with the 'vitality and viability' limb of the impact test.

### **The Sequential Test**

4.63 Policy requires that applicants and LPAs adopt a sequential approach when considering applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date development plan. The 'centres first' approach means that proposals for main town centre uses should be preferred in town centres before edge-of-centre locations (i.e. those within 300m of the Primary Shopping Area) and with out-of-centre locations to be considered, only if suitable sites are not available in or on the edge of existing centres. The assessment should determine whether sites are suitable and available alternatives to accommodate the proposed development, taking into account the need for reasonable flexibility in scale and format.

4.64 We have had regard to the conclusions of the 2016 High Court Judgment which related to a developer-led application in Mansfield where Aldi was the intended operator. Some have suggested the effect of the judgment as being to always render the identity of an applicant irrelevant in the application of the sequential test, and that sites should be considered for their suitability and availability for the "*broad type of development*" proposed (with "*broad type of development*" meaning any retailer that sells primarily food & convenience goods). This approach could mean that the sequential test must always fail in any situation where any more centrally located site

(irrespective of size) were available to accommodate any form of convenience retailing. That would in our view represent a mis-application of policy and mis-interpretation of the judgment.

4.65 Instead the judgment states that the identity of an applicant is not “*generally*” relevant but acknowledges also that “*there are instances where identity may matter*”. Those instances are not exhaustively defined. Moreover, it is reasonable to take the position that the “*broad type of development*” may comprise a LAD operator, rather than any foodstore or convenience store. We conclude that it remains robust to apply the sequential test on the basis that there is only limited scope for LAD retailers to be flexible in the configuration of their floorspace, albeit flexibility must be considered to avoid conflict with the requirements of policy in the NPPF. This is the approach that we have adopted in the application of the sequential test in this case. We have noted also in Section 2.0 the normal criteria that Lidl adopts in seeking sites and premises to support its foodstores. In this instance, Lidl has acquired a site which is very slightly below those ideal criteria by being just less than 0.8ha in area and able to accommodate 117 vehicular spaces. However the extent to which this site departs from the standard requirements is negligible and within the bounds of reasonable flexibility for a LAD operator.

4.66 Having defined those criteria, we have considered whether there are any more centrally located opportunities to accommodate the development. Our conclusions are as follows.

#### **Vacant Premises – Local Centres and District Centre**

4.67 As set out above, our survey of the relevant local centres and district centres identified a small number of vacant units. All are small, and most very small in scale, and unable, therefore, to accommodate the Lidl proposals, even having adopted a flexible approach.

#### **Vacant Premises/ Sites – Coventry City Centre**

4.68 We have identified a number of vacant units in the City Centre. The majority are small at between 50 sqm and 500 sqm (gross) and are therefore unsuitable to accommodate the development that is proposed, adopting a flexible approach. We also noted a number of larger vacant units and vacant sites and consider these in turn.

#### ***Ikea, Croft Road***

4.69 The Ikea site extends over four retail floors, and also incorporates an 800 space car park over 3 further floors. Its exact floorspace is unknown, but its footprint is approximately 7,100 sqm which suggests its total gross floorspace could be something in the region of 28,400 sqm (gross).

4.70 IKEA announced on 22<sup>nd</sup> May that the Coventry store would remain closed following the Covid-19 pandemic. We have found no evidence of the site / property being marketed for disposal or that, as a result, it is available.

4.71 In terms of suitability the store is approximately 8 to 9 times larger (gross) than the Lidl proposals and the unit is therefore significantly too large to accommodate the Lidl proposals. Such a large unit would render it unviable for Lidl’s purposes. It is therefore considered to be unsuitable and is discounted.

**Former BHS unit, The Precinct**

- 4.72 This unit comprises the former British Home Stores (BHS) store within Coventry City Centre, which has remained empty since the collapse of BHS in 2016. We cannot find any evidence that the unit is being actively marketed.
- 4.73 It is understood that the unit extends to 2,720 sqm of floorspace over two floors. The unit is a Grade II Listed building. The unit in its current format is unsuitable to accommodate the proposals, with floorspace being split over two floors. This would require substantial compromise to Lidl's operational model which relies upon operational efficiencies delivered over a single level trading floorplate. In addition planning permission and listed building consent were granted in 2017 and 2018 (FUL/2017/2767 and LB/2018/2494) to redevelop the wider shopping centre, including the BHS unit. Works appear to have now started on site. The permitted scheme includes plans to subdivide the former BHS site into smaller units, such that the units will be too small to accommodate the scale of development proposed by Lidl.
- 4.74 In addition, the unit does not have an adjoining surface level car park and associated servicing, given that it is located on a pedestrianised street. As set out at Section 2.0 of this Statement these elements are essential requirements for the Lidl operational model (other than in exceedingly high footfall locations in Greater London) rendering the unit unsuitable.
- 4.75 We therefore consider that the site is not available or suitable for the development that is proposed, even adopting a flexible approach.

**Former DW Sport**

- 4.76 This unit comprises the former DW Sport Outlet, which is located on the pedestrianised Broadgate. It is a Council-managed unit which is being actively marketed on their website and is therefore considered to be available. The Council's website confirms that the unit extends to 1,098 sqm and it is understood that this is over 2 floors. However the site, and adjoining unit, are also subject to a planning application (reference: FUL/2020/0542) for a change of use from former Class A1 to former Class D2. It is expected to be used as a multi-use leisure venue for conferences, live music, comedy, rehearsal space and community/ church use. Planning Permission for the proposals was granted on 13 January 2021. The application was submitted by DCB Events Limited, which intends to use the building for a relocation of 'The Empire' music venue. We therefore consider that the unit is unavailable.
- 4.77 In any event, as Lidl's application proposals cover 2,279 sqm over one level, this unit is therefore too small to accommodate the development that is proposed. In addition this unit does not have an adjoining surface level car park and associated servicing.
- 4.78 We conclude that the site is not available or suitable having applied reasonable flexibility.

***Units A, B and C, Sky Dome, Croft Road***

- 4.79 The Coventry Skydome is a leisure and entertainment destination located off Ringway Rudge at the edge of the City Centre. Units A, B and C are currently being marketed and are therefore considered to be available. However collectively the units extend to 803 sqm of floorspace and are therefore substantially too small to accommodate the proposed development. The units are therefore discounted from further consideration.

***Vacant land Fairfax Street/Priory Street***

- 4.80 The site comprises land on Fairfax Street/ Priory Street that previously housed the Gala Bingo building, before it was recently demolished.
- 4.81 There is a pending planning application (reference: FUL/2020/1421) for the site for the erection of co-living accommodation (student and non-student), with ancillary facilities including 693 sqm of retail use on the ground floor. The application is submitted by the proposed operator, CODE students, which has a leasehold interest on the site. This suggests that the application is not speculative and that the site is therefore unavailable.
- 4.82 The retail unit proposed is also too small to accommodate the development that is proposed. For these reasons, we consider that the site is neither suitable nor available.

***Vacant Land adjacent to Coventry Market, Queen Victoria Road***

- 4.83 The site comprises vacant land on Queen Victoria Road, adjacent to Coventry Market. The site measures approximately 1,300 sqm (gross) and is therefore too small to accommodate Lidl's proposals, even allowing for flexibility. No evidence can be found of marketing either and therefore it is unclear whether the site is available. We therefore discount the site given it is not suitable to accommodate the proposed development.

***Former Coventry Sports and Leisure Centre, Fairfax Street***

- 4.84 The former Coventry Sports and Leisure Centre is located on Fairfax Street, and is approximately 250 metres east of the defined Primary Shopping Area of the City Centre. Part of the site is a Grade II listed building.
- 4.85 The existing unit is located over multiple floors and is irregular in shape. Goad states that the centre has a footprint of 4,500 sqm (gross) meaning it is also significantly larger than that required for Lidl's proposals. In addition, given its listed status, and previous use as a swimming pool and leisure centre, it is considered unsuitable to accommodate the Lidl proposals, which would require extensive internal remodelling and would result in the loss of internal features which are included on the listing including the main pool areas and brick and tile finishes.
- 4.86 For these reasons, the site is not considered to be suitable to accommodate the proposed development.

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**157 Corporation Street**

- 4.87 157 Corporation Street is a former multi storey office building that was formerly occupied by the Coventry Evening Telegraph. The site has planning permission (reference OUT/2018/0188) for demolition of the existing buildings and redevelopment for a mixed-use scheme including a hotel, restaurant, bar, conferencing facilities and student accommodation. Since consent was granted in July 2018 reserved matters have been submitted and the discharge of conditions is ongoing. This indicates that there is a significant likelihood of the scheme being delivered and leads us to conclude that the site is unavailable.
- 4.88 In considering the existing building, it is understood to measure approximately 3,410 sqm and is therefore too large to accommodate the development that is proposed, as well as being unsuitable because if is arranged over two floors. The site also does not have adjacent servicing and car parking, and is considered to be unsuitable and unavailable to accommodate the development that is proposed.

**Allocated Sites****City Centre South**

- 4.89 The site is located within the southern part of Coventry City Centre. It is bordered by Upper Precinct to the north, Greyfriars Road and Warwick Road to the south, Hertford Street to the east and Queen Victoria Road to the west.
- 4.90 The City Centre South locality covers approximately 6.9ha according to the CCC investment website, and comprises a major redevelopment scheme led by Shearer Property Group encompassing retail, leisure and residential. The scheme was granted outline consent (application reference: OUT/2012/0575) in May 2012 however discussions with Officers of the LPA has confirmed that the consent has expired without being implemented.
- 4.91 New plans have now been published (June 2020) and it had been suggested that a new planning application would be submitted to the LPA in late 2020. We understand that CCC will be seeking to acquire land through negotiation and compulsory purchase to enable the scheme to progress.
- 4.92 Given the need for a planning application to be prepared, submitted and determined, and for conditions to be discharged before a scheme can be implemented, allied to the need for an acquisition process that may involve compulsory purchase, we conclude that it is highly unlikely that the scheme will be delivered in a reasonable period, such that we consider that the site is unavailable.
- 4.93 In addition, we note that the site was discounted as part of the recent consent for a change of use of the former Toys R Us unit at Cross Point business park (reference S73M/2019/1628) as not being a sequential alternative.
- 4.94 Given the above, we discount the site from further consideration.

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***Eastern Green Major District Centre***

- 4.95 Eastern Green is a sustainable urban extension (SUE) proposed to provide up to 2,250 homes, 15 ha of employment land, educational facilities and a new Major District Centre. Policy R1 sets out that the SUE could include up to 10,000 sqm (gross) of retail floorspace, of which approximately 5,000 sqm would be for a new foodstore.
- 4.96 An outline application (OUT/2018/3225) for the SUE, including a district centre of 10,000 sqm retail and a local centre of 1,000 sqm secured a resolution to grant planning permission, subject to the signing of a legal agreement, on 26 November 2020. To date the legal agreement has not been signed. The Planning Statement submitted with that application suggests that the retail uses at the district centre could accommodate a foodstore of 5,000 sqm and 4,000 sqm of bulky goods retail but only height parameters are proposed to be fixed at this stage. Whilst access to the site, via a separate planning application, has been approved, the decision notice has not yet been issued at the time of writing in February 2021. As a result there is no centre at present and no reserved matters approval for any centre. Given this and that no enabling works have progressed on site, we consider that the site cannot be considered available within a reasonable time frame. It appears also that the intention is to secure a foodstore substantially larger than a LAD foodstore. We have therefore discounted this site.

**Sequential Sites – Summary**

- 4.97 In summary, we have not identified any vacant premises within the Local Centres, District Centre or Coventry city centre that are suitable and/or available to accommodate the development that is proposed, allowing for reasonable degree of flexibility. We have also reviewed allocated sites and concluded, again, that they are neither suitable nor available to accommodate the development that is proposed. In all instances, we have adopted a flexible approach, having regard to the legitimate constraints to flexibility that are inherent in the broad type of development that is proposed. We therefore consider that the sequential test is passed.

## 5. Planning Merits

### Residential Allocation

- 5.1 Part of the site is allocated as part of housing allocation H2: 12 - *Site of LTI Factory, Holyhead Road* for 110 dwellings. The allocation also covers land to the north and east of the site. The submitted Persimmon application as amended during its determination with requirements for open space, landscaping and other spatial requirements has reduced from 95 dwellings to 73 dwellings, or 66% of the allocation. This leaves a residual requirement of only 37 dwellings, which is less than 0.15% of CCC's total housing requirement between 2011 and 2031, such that the impact of developing the site for an alternative use would be negligible on the Council's overall housing supply. We also note that there are no policies within the local plan that restrict alternative uses on allocated housing sites.

### Economic Considerations

- 5.2 Paragraph 80 of the NPPF sets out that planning decisions *"should help create the conditions in which businesses can invest, expand and adapt"*. It goes on to state that *"significant weight should be placed on the need to support economic growth"* and, in this regard, the proposals will support approximately 40 jobs in the operational phase, as well as temporary jobs during the construction phase.

### Design

- 5.3 We have described the development generally within this Statement and have explained that Lidl's operational model drives a particular approach to the size, configuration and internal layout of its stores.
- 5.4 The Design and Access Statement concludes that the proposals accord with the emphasis of Section 12.0 of the NPPF and that they provide a modern, well designed development that incorporates high quality design, materials and landscaping. The proposals therefore accord with Policy DE1 through the provision of high-quality design which respects and enhances the nearby surroundings.
- 5.5 We consider that the redevelopment of this previously developed land will bring about a positive improvement to the appearance of the vacant site.

### Amenity

- 5.6 In respect of other amenity considerations, a Noise Impact Assessment has been undertaken to determine any noise implications that might arise as a result of the proposals. The Assessment has also considered impact on the proposed residential dwellings to the north of the site. It notes that the potential for noise impact is primarily associated with noise emissions from fixed plant and delivery operations. However it concludes that, through appropriate mitigation in the form of timber fencing, the proposals will not have an adverse impact on neighbouring properties.



- 5.7 A Lighting Plan has been prepared which determines that the external lighting has been carefully positioned so that there will be no adverse impact on neighbouring properties from light overspill.

### **Traffic and Transportation**

- 5.8 The site has a good level of accessibility for pedestrians, cyclists and by public transport, with nearby bus stops on Holyhead Road, maximising opportunities for the site to be accessed by non-car modes. Vehicular access for customers, staff and delivery vehicles will be taken from the existing estate road off the roundabout along Holyhead Road.
- 5.9 A Transport Assessment has been prepared to review the access arrangement and to test the potential impact of the development on the local highway network. It concludes that the site can be satisfactorily accessed and that the traffic impact of the proposal will fall within the capacity of the road network. In addition, the access arrangement has been tested and swept path analysis indicates that a 16.5m long HGV will be able to satisfactorily enter, service, turn within, and exit the site in a forward gear.
- 5.10 A total of 117 car parking spaces will be provided including 8 parent and child spaces, and 7 accessible bays. As well as this, 6 electric vehicle charging bays will also be provided, including two rapid charging spaces and 4 fast charging spaces. In addition 18 cycle spaces are provided adjacent to the store entrance under the canopy, such that they are covered. Pedestrian access through the site is to be demarcated, providing links from new pedestrian footpaths on the access road, directly to the store entrance.
- 5.11 We therefore consider that the proposals accord with Local Plan Policies AC1, AC3 and AC4.

### **Flood Risk and Drainage**

- 5.12 The site is located within Flood Zone 1. The applicant has, however, prepared a Flood Risk Assessment and Outline Drainage Strategy which confirm that the site is not at risk from flooding sources, including surface water and fluvial. The proposals will not result in an increase in flood risk off-site. It also confirms that the site can be adequately drained and will not impact on water quality. We therefore consider that the proposals accord with Policies EM4, EM5 and EM6.

### **Sustainability**

- 5.13 Development of the site enables the reuse of a vacant, brownfield site in a sustainable location. A Sustainable Buildings Statement and an Energy Statement have been prepared by DDA. The reports demonstrate that Lidl stores are designed to be as environmentally sound as possible.
- 5.14 The Energy Statement demonstrates that the building is capable of achieving a 174.41% reduction in carbon dioxide and a 170.18% reduction in energy, over that required by Building Regulations (2013).

- 5.15 Photovoltaic panels are proposed for the roof of the building which provide sufficient electricity to power 100% of the store's regulated energy demand for all regulated electricity installations (note this is dependent on the store's energy use profile compared to the energy generation profile).
- 5.16 In respect of other sustainability measures, the store heating systems are highly efficient condensing boilers which recover waste heat from the combustion process. All heating is regulated by sensors. The canopy of the store is also designed, along with automatic blinds, to minimise thermal gain within the building.
- 5.17 The lighting in the storage and warehouse areas is controlled by movement sensors, which means that lights only turn on when the space is in use. The sales area uses full lighting during trading hours but cuts back to one third lighting before and after trading hours to allow for re-stocking of the store. A Building Management System and LUX sensors control the lighting. This means that lights are only on when necessary during dark periods and ensures that lights do not remain on later than 2 hours after the store closes.
- 5.18 Lidl also adopts environmentally sound methods in its operation. Waste removal policies comprise the compacting or bailing of waste card and packing materials at its stores. Waste material is then collected on return deliveries to the regional distribution centre, where it is accumulated for recycling. A similar approach is adopted with clear plastics from goods packaging. Efficient removal of waste from Lidl stores reduces the number of vehicles on the road, helping to reduce emissions, noise pollution and congestion.
- 5.19 Electric vehicle charging points are also proposed to encourage electric vehicle use by customers.
- 5.20 Given the above, we conclude that the proposals accord with Policies EM1, EM2 and EM8.

### **Air Quality**

- 5.21 An Air Quality Assessment has been undertaken by SLR. The Assessment demonstrates that the proposals will have a 'not significant' impact during construction. The Assessment also confirms that during the operational phase of the development, the proposals are predicted to result in a 'negligible' impact on annual mean Particulate Matter (PM<sub>10</sub>) concentrations at all sensitive receptors.
- 5.22 The Assessment advises that the impacts on annual mean NO<sub>2</sub> concentrations would result in a 'slight adverse' impact on 2 receptor locations with the remaining locations having a 'negligible' impact. However, the Assessment assumes a worst-case scenario. It goes on to conclude that the overall impact would be 'not significant'.
- 5.23 Given the development is classified as 'major' in line with the CCC Air Quality SPD, it is necessary for the development to include air quality improvement measures. The Assessment sets out that Type 1 (EV chargers) and Type 2 (travel plan) mitigation is required and has been provided. For Type 3 mitigation the SPD requires a 'damage cost' calculation to be undertaken and for proposals to demonstrate that this has been offset. The Assessment confirms that the measures incorporated on site, are sufficient to 'offset' the calculated 'cost' and therefore no contribution to air quality mitigation is required.

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5.24 We therefore conclude that the proposals are in accordance with Policy EM7.

#### **Ground Conditions**

5.25 A Phase 1 Geo-Environmental Report and Phase 2 Ground Investigation Report have been prepared by Wardell Armstrong. The reports make a number of recommendations for the redevelopment of the site, given the site's previous use as a factory, which may be readily covered by the imposition of planning conditions to ensure appropriate mitigation is in place.

#### **Archaeology**

5.26 A Desk-Based Archaeological Assessment of the site has previously been undertaken by RPS. It confirmed that the site is likely to have a low potential for archaeological remains. It did, however, recommend some historic building recording. This has now been done by the landowner prior to the buildings being demolished. As a result, no further archaeological work is required in respect of the proposals. We therefore consider that the proposals accord with Policy GE3.

#### **Ecology**

5.27 A Preliminary Ecological Appraisal has been undertaken by Focus Ecology. The appraisal confirms that the site comprises mainly hardstanding and is of low ecological value. The report does not identify any protected species and confirms that, as long as the buildings are removed by April 2021, no further ecological surveys are required. The buildings have now been demolished, therefore we consider that the proposals accord with Policy GE3.

#### **Arboriculture**

5.28 An Arboricultural Assessment has been prepared by Rob Keyzor. It notes that there are not trees on the site and that the trees around the wider site's boundaries do not represent a constraint to its redevelopment.

## 6. Summary and Conclusions

- 6.1 Avison Young is instructed by Lidl to prepare this Planning & Retail Statement in support of an application for full planning permission for the development of a new Class E Lidl foodstore, car parking, access and landscaping on land off Holyhead Road, Coventry. The proposals are described within the Design and Access Statement and by the Proposed Site Plan and Elevation drawings that accompany this Statement.
- 6.2 The application site extends to 0.911 hectares, with the development comprising a discount foodstore of 2,279 sqm GEA and a net sales area of 1,410 sqm.
- 6.3 The site comprises previously developed land with its vacant former factory buildings now demolished. The proposals represent an opportunity to redevelop a vacant site, creating 40 jobs in the process. The design of the foodstore is simple and modern. It will be located along the site's western boundary, with the store entrance on the south eastern corner of the building. We consider that the proposals comply with Policy DE1 which seeks to ensure high quality design. The proposal also includes 117 car parking spaces and the site will be accessed via an estate road from the existing roundabout onto the A4114 Holyhead Road.
- 6.4 Having regard to the policies of the Local Plan and the Policies Map, the site is considered to be out-of-centre for the purpose of the application of policy relating to new retail development and centres. As a consequence, the proposal must be considered in relation to the sequential approach. Moreover, the Local Plan sets a floorspace threshold of 1,000 sqm (gross) above which there is a requirement to provide a retail impact assessment. Both of these elements are provided at Section 4.0 of this Statement.
- 6.5 To support our assessment of impact we visited Coventry City Centre and the relevant Local Centres and District Centre. We noted the health of each centre, having regard to the data on their composition within the Coventry City Wide Shopping and Centres Study 2014 and Local Centres Assessment. Our findings were broadly consistent with both of these evidence base documents, and found the centres to be performing well at their levels in the hierarchy and having regard to the vitality and viability indicators that we have considered.
- 6.6 In relation to the impact test, we have concluded that the likely trade impact upon the role, function and health of nearby local centres will be very limited (and certainly not 'significant adverse') due to their materially different trading functions. We expect the majority of trade diversion to the proposal to come from larger foodstores/supermarkets nearby which lie outside of defined 'town centres' such as Morrisons at Holyhead Road. As a consequence, we have concluded that there is no evidence that there is likely to be any conflict with the 'vitality and viability' limb of the impact test. We have also concluded that the proposals will not impact on any planned town centre investment.
- 6.7 In relation to the sequential test, we have concluded that there are no more centrally located sites that could accommodate the development that is proposed, even adopting a flexible approach, such that the sequential test is passed.

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- 6.8 Part of the site has no designation, to which general policies of the development plan apply. The majority of the site and wider land parcel is, however, allocated for residential development. We have noted that the site is allocated for 110 dwellings, and that the Persimmon application on land adjacent (which comprises the remainder of the housing allocation) will accommodate 73 dwellings. The shortfall of 37 dwellings against the capacity suggested in the Local Plan allocation is insignificant in the context of the Council's overall housing supply and total housing requirement. We therefore conclude that there is no conflict with policy, on the basis of the negligible impact on wider housing delivery.
- 6.9 We have also concluded that there are no technical considerations relating to drainage, highways, air quality, noise, ecology, ground conditions or archaeology that would impact on the deliverability of the proposals.
- 6.10 An important benefit arising from the proposal is that the store will support circa 40 jobs. Paragraph 80 of the NPPF sets out a commitment to supporting sustainable economic growth and substantial weight is to be attached to proposals that deliver jobs.
- 6.11 Having regard to the lack of conflict with the relevant policies of the development plan, and the compliance of the proposals with relevant policy in the NPPF, together with the lack of technical, environmental or amenity based reasons why the development may not proceed, we conclude that the proposals are for sustainable development to which the presumption in the NPPF should apply.

**Avison Young**

**March 2021**

# Appendix 1

## Quantitative Impact Assessment Tables

LIDL  
HOLYHEAD ROAD, COVENTRY

**TABLE 1: TURNOVER OF PROPOSED FOODSTORE**

STORE	NET SALES AREA (sq m net)	SALES DENSITY (£/sq m)	TURNOVER (£m)
<i>Proposed store</i>	<b>1410</b>		
Convenience goods floorspace	1128	£10,103	£11.4
Comparison goods floorspace	282	£5,905	£1.7

**Notes:**

Floorspace taken from submitted application

Sales density figures provided by GlobalData

Assumed that 80% of the total net sales area is devoted to the sale of convenience goods

TABLE 2: TURNOVER OF EXISTING STORES AND CENTRES

STORE / CENTRE	SALES FLOORSPACE (sq m net)	CONVENIENCE GOODS FLOORSPACE (sq m net)	Sales Density (£ per sq m)	Turnover (£m)
<b>Coventry City Centre</b>				
Marks & Spencer, The Precinct	1347	1347	10179	13.71
Sainsbury's, Trinity Street	2113	1796	11691	21
Co-op, Corporation Street	471	462	10824	5
Iceland, Queen Victoria Road	579	550	6859	3.77
Tesco Express, Shelton Square	380	372	13797	5.13
Other	3500	3500	5000	17.5
Sub-total	8390	8027	-	66.11
<b>Bell Green District Centre</b>				
Aldi, Roosberry Avenue	722	578	10827	6.26
Farmfoods, Riley Square	511	501	4042	2.03
Other	500	500	4000	2
Sub-total	1733	1579	-	10.28
<b>Arena Park Major District Centre</b>				
Tesco Extra, Longford Road	8547	4517	13797	62.32
Marks & Spencer, Arena Park	1347	1347	10179	13.71
Other	80	80	4000	0.32
Sub-total	9974	5944	-	76.35
<b>Canon Park Major District Centre</b>				
Iceland, Cannon Park	450	428	6859	2.94
Tesco, Cannon Park	3126	2657	13797	36.66
Aldi, Shultern Lane	1254	1003	13797	13.84
Other	40	40	4000	0.16
Sub-total	4870	4128	-	53.6
<b>Brandon Road (Warwickshire Shopping P</b>				
M&S, Kynner Way	800	760	10179	7.74
Morrisons, Skipworth Road	3643	3097	12656	39.2
Sub-total	4443	3857	-	46.93
<b>Brade Drive District Centre</b>				
Asda, Brade Drive	6884	4130	13659	56.41
<b>Jubilee Crescent District Centre</b>				
Asda, Jubilee Crescent	707	636	13659	8.69
Tesco, Jubilee Crescent	455	432	13797	5.96
Other	400	400	4000	1.6
Sub-total	1562	1468	-	16.25
<b>Ball Hill Major District Centre</b>				
Tesco Express, Walsgrave Road	263	250	13797	3.45
Other	700	700	4000	2.8
Sub-total	963	950	-	6.25
<b>Foleshill District Centre</b>				
	1100	1100	4000	4.4
<b>Binley Road Local Centre</b>				
Iceland, Binley Road	447	425	6859	2.92
Lidl, Binley Road	1020	816	10103	8.24
Other	213	209	3000	0.63
Sub-total	1680	1450	-	11.79
<b>Willenhall Local Centre</b>				
Co-op, Remembrance Road	356	349	10824	3.78
<b>Earlsdon District Centre</b>				
Co-op, Earlsdon Street	526	473	10824	5.12
Other	400	400	4000	1.6
Sub-total	926	873	-	6.72
<b>Jardine Crescent District Centre</b>				
Farmfoods, Jardine Crescent	270	265	4042	1.07
Other	600	600	4000	2.4
Sub-total	870	865	-	3.47
<b>Holbrook Lane Local Centre</b>				
Morrisons, Parkgate Road	2333	1983	12656	25.1
<b>Ansty Road Local Centre</b>				
Co-op, Ansty Road	329	322	10824	3.49
<b>Daventry Road District Centre</b>				
Aldi, Hinckley Road	829	788	10827	8.53
Other	450	450	4000	1.8
Sub-total	1279	1238	-	10.33
<b>Edge-of / Out-of-centre</b>				
Asda, Abbey Park, London Road	3094	2630	13659	35.92
Aldi, Radford Road, Brade Drive	715	572	10827	6.19
Aldi, Gallagher Retail Park	1492	1194	10827	12.93
Aldi, Airport Retail Park	1200	960	10827	10.39
The Food Warehouse, Airport Retail Park	639	511	6859	3.5
Sainsbury's, Austin Drive	3093	2846	11691	33.27
Tesco Extra, Crosspoint Retail Park	5985	4268	13797	58.89
Tesco, Clifford Bridge Road, Walgrave	2627	2233	13797	30.81
Morrisons, Alvis Retail Park	3618	3075	12656	38.92
Lidl, Brandon Road	1166	1020	10103	10.31
Asda, Daventry Road	768	614	13659	8.39
Lidl, John Wigley Way	890	712	10103	7.19
Co-op, Woodley Lane	221	217	10824	2.35
Co-op, Sutherland Avenue	163	160	10824	1.73
Co-op, Allesley Old Road	442	398	10824	4.31
Co-op, Tile Hill Lane	266	261	10824	2.83
Sainsbury's, Fletchamstead Highway, C	5664	4248	11691	49.66

Notes:  
Net floorspace and net convenience floorspace taken from Coventry City Wide Shopping and Centres Study 2014 Update (December 2014)  
Sales densities derived from GlobalData  
Turnover = net convenience floorspace x sales density  
2018 prices



TABLE 3: CONVENIENCE GOODS TRADE DIVERSION TO PROPOSED LIDL FOODSTORE, 2025

STORE / CENTRE	TURNOVER (£m)		DIVERSION TO PROPOSED STORE		RESIDUAL TURNOVER (£m)	IMPACT (%)
	2020	2025	(%)	(£m)		
<b>Coventry City Centre</b>						
Marks & Spencer, The Precinct	£13.71	£13.78	0.0%	£0.0	£13.78	0.0%
Sainsbury's, Trinity Street	£21.00	£21.11	5.0%	£0.6	£20.54	-2.7%
Co-op, Corporation Street	£5.00	£5.03	0.0%	£0.0	£5.03	0.0%
Iceland, Queen Victoria Road	£3.77	£3.79	0.0%	£0.0	£3.79	0.0%
Tesco Express, Shelton Square	£5.13	£5.16	0.0%	£0.0	£5.16	0.0%
Other	£17.50	£17.59	0.5%	£0.1	£17.53	-0.3%
Sub-total	£66.11	£66.44	£0.06	£0.63	£65.81	-0.9%
<b>Bell Green District Centre</b>						
Aldi, Roosberry Avenue	£6.26	£6.29	0.0%	£0.0	£6.29	0.0%
Farmfoods, Riley Square	£2.03	£2.04	0.0%	£0.0	£2.04	0.0%
Other	£2.00	£2.01	0.0%	£0.0	£2.01	0.0%
Sub-total	£10.29	£10.34	£0.00	£0.00	£10.34	0.0%
<b>Arena Park Major District Centre</b>						
Tesco Extra, Longford Road	£62.32	£62.63	2.0%	£0.2	£62.40	-0.4%
Marks & Spencer, Arena Park	£13.71	£13.78	0.0%	£0.0	£13.78	0.0%
Other	£0.32	£0.32	0.0%	£0.0	£0.32	0.0%
Sub-total	£76.35	£76.73	£0.02	£0.23	£76.50	-0.3%
<b>Canon Park Major District Centre</b>						
Iceland, Cannon Park	£2.94	£2.95	0.0%	£0.0	£2.95	0.0%
Tesco, Cannon Park	£36.66	£36.84	2.0%	£0.2	£36.62	-0.6%
Aldi, Shultern Lane	£13.84	£13.91	5.0%	£0.6	£13.34	-4.1%
Other	£0.16	£0.16	0.0%	£0.0	£0.16	0.0%
Sub-total	£53.60	£53.87	£0.07	£0.80	£53.07	-1.5%
<b>Brandon Road (Warwickshire Shopping Park) Major District Centre</b>						
M&S, Kynner Way	£7.74	£7.78	0.0%	£0.0	£7.78	0.0%
Morrisons, Skipworth Road	£39.20	£39.40	0.0%	£0.0	£39.40	0.0%
Sub-total	£46.94	£47.17	£0.00	£0.00	£47.17	0.0%
<b>Brade Drive District Centre</b>						
Asda, Brade Drive	£56.41	£56.69	1.0%	£0.1	£56.58	-0.2%
<b>Jubilee Crescent District Centre</b>						
Asda, Jubilee Crescent	£8.69	£8.73	1.0%	£0.1	£8.62	-1.3%
Tesco, Jubilee Crescent	£5.96	£5.99	0.0%	£0.0	£5.99	0.0%
Other	£1.60	£1.61	0.0%	£0.0	£1.61	0.0%
Sub-total	£16.25	£16.33	£0.01	£0.11	£16.22	-0.7%
<b>Ball Hill Major District Centre</b>						
Tesco Express, Walsgrave Road	£3.45	£3.47	0.0%	£0.0	£3.47	0.0%
Other	£2.80	£2.81	0.0%	£0.0	£2.81	0.0%
Sub-total	£6.25	£6.28	£0.00	£0.00	£6.28	0.0%
<b>Foleshill District Centre</b>						
	£4.40	£4.42	0.0%	£0.0	£4.42	0.0%
<b>Binley Road Local Centre</b>						
Iceland, Binley Road	£2.92	£2.93	0.0%	£0.0	£2.93	0.0%
Lidl, Binley Road	£8.24	£8.28	0.5%	£0.1	£8.22	-0.7%
Other	£0.63	£0.63	0.0%	£0.0	£0.63	0.0%
Sub-total	£11.79	£11.85	£0.01	£0.06	£11.79	-0.5%
<b>Willenhall Local Centre</b>						
Co-op, Remembrance Road	£3.78	£3.80	0.0%	£0.0	£3.80	0.0%
<b>Earlsdon District Centre</b>						
Co-op, Earlsdon Street	£5.12	£5.15	1.0%	£0.1	£5.03	-2.2%
Other	£1.60	£1.61	0.0%	£0.0	£1.61	0.0%
Sub-total	£6.72	£6.75	£0.01	£0.11	£6.64	-1.7%
<b>Jardine Crescent District Centre</b>						
Farmfoods, Jardine Crescent	£1.07	£1.08	0.0%	£0.0	£1.08	0.0%
Other	£2.40	£2.41	0.0%	£0.0	£2.41	0.0%
Sub-total	£3.47	£3.49	£0.00	£0.00	£3.49	0.0%
<b>Holbrook Lane Local Centre</b>						
Morrisons, Parkgate Road	£25.10	£25.23	1.5%	£0.2	£25.05	-0.7%
<b>Ansty Road Local Centre</b>						
Co-op, Ansty Road	£3.49	£3.51	0.0%	£0.0	£3.51	0.0%
<b>Daventry Road District Centre</b>						
Aldi, Hinckley Road	£8.53	£8.57	2.0%	£0.2	£8.34	-2.7%
Other	£1.80	£1.81	0.0%	£0.0	£1.81	0.0%
Sub-total	£10.33	£10.38	£0.02	£0.23	£10.15	-2.2%
<b>Edge-of / Out-of-centre</b>						
Asda, Abbey Park, London Road	£35.92	£36.10	1.0%	£0.1	£35.99	-0.3%
Aldi, Radford Road, Brade Drive	£6.19	£6.22	18.0%	£2.1	£4.17	-33.0%
Aldi, Gallagher Retail Park	£12.93	£12.99	1.0%	£0.1	£12.88	-0.9%
Aldi, Airport Retail Park	£10.39	£10.44	0.0%	£0.0	£10.44	0.0%
The Food Warehouse, Airport Retail Park	£3.50	£3.52	0.0%	£0.0	£3.52	0.0%
Sainsbury's, Austin Drive	£33.27	£33.44	1.0%	£0.1	£33.32	-0.3%
Tesco Extra, Crosspoint Retail Park	£58.89	£59.18	0.0%	£0.0	£59.18	0.0%
Tesco, Clifford Bridge Road, Walgrave	£30.81	£30.96	0.0%	£0.0	£30.96	0.0%
Morrisons, Alvis Retail Park	£38.92	£39.11	42.0%	£4.8	£34.33	-12.2%
Lidl, Brandon Road	£10.31	£10.36	0.0%	£0.0	£10.36	0.0%
Asda, Daventry Road	£8.39	£8.43	0.0%	£0.0	£8.43	0.0%
Lidl, John Wigley Way	£7.19	£7.23	2.0%	£0.2	£7.00	-3.2%
Co-op, Woodley Lane	£2.35	£2.36	0.0%	£0.0	£2.36	0.0%
Co-op, Sutherland Avenue	£1.73	£1.74	0.5%	£0.1	£1.68	-3.3%
Co-op, Allesley Old Road	£4.31	£4.33	1.0%	£0.1	£4.22	-2.6%
Co-op, Tile Hill Lane	£2.83	£2.84	1.0%	£0.1	£2.73	-4.0%
Sainsbury's, Fletchamstead Highway, Canley	£49.66	£49.91	6.0%	£0.7	£49.22	-1.4%
Other			5.0%	£0.6		
<b>TOTAL</b>			<b>100.0%</b>	<b>£11.4</b>		

Notes:

2020 turnover taken from Table 2. Projected forward to 2025 using forecasts contained in Experian's Retail Planner Briefing Note 17 (February 2020). Pattern of trade diversion based upon Avison Young's own forecasts, taking into account the location and retail offer of competing stores.

## Contact Details

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