Proposed Lidl Store, New Hey Road, Huddersfield

Planning and Retail Statement

Lidl GB Ltd

October 2020

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Contents

Appendices

1.0 Introduction

Scope of Report

1.1 This report has been prepared by Lichfields on behalf of Lidl GB Ltd ("Lidl"). It accompanies a full planning application for the redevelopment of land off New Hey Road, Huddersfield for a Lidl foodstore.

1.2 The description of development is as follows:

"Erection of foodstore, with associated parking, servicing areas and landscaping"

1.3 This statement assesses the proposed foodstore against the relevant national and local planning policy, including the key tests of the sequential approach and impact. It should be read alongside the following documents, also prepared to accompany the application:

- a Design and Access Statement, prepared by Lichfields;
- a Heritage Statement, prepared by Lichfields;
- a Community Consultation Statement, prepared by Lichfields;
- a Health Impact Assessment, prepared by Lichfields;
- a Transport Assessment (including Stage 1 Road Safety Audit) and Travel Plan, prepared by EJSA Associates;
- a Flood Risk Assessment and Drainage Strategy, prepared by Beam Consulting;
- a Noise Assessment, prepared by Miller Goodall Ltd;
- an Air Quality Impact Assessment, prepared by Miller Goodall Ltd
- a Phase 1/Desk Top Contaminated Land Assessment, prepared by Lithos Consulting;
- a Preliminary Ecological Appraisal, prepared by Tyler Grange; and,
- an Arboricultural Survey, prepared by JCA Ltd

Structure of Report

1.4 The report structured is as follows:

- Section 2.0 describes the application site and surrounding area;
- Section 3.0 describes the proposed development, as well as relevant planning history;
- Section 4.0 summarises relevant national and local planning policy;
- Section 5.0 describes the local retail context, and summarises existing centres and other existing provision within the area;
- Section 6.0 sets out the methodology used in the sequential site and impact assessments included in this report;
- Section 7.0 considers the application proposals in the context of the sequential approach to site selection;
- Section 8.0 addresses the potential impact of the proposed development;
- Section 9.0 considers the conformity of the proposals with the adopted development plan;
- Section 10.0 assesses the proposed development against the three pillars of sustainable development set out in national planning policy; and
- Section 11.0 provides a summary of the conclusions drawn.

2.0 Site Context

Site and Surroundings

2.1 The application site comprises the vacant former Spotted Cow Public House, along with land to the rear, on New Hey Road, Huddersfield, around 4km to the west of Huddersfield Town Centre. The site extends to around 1 ha and forms an L-shape, the front part of which (adjacent to New Hey Road) comprises an area of hardstanding associated with the former Spotted Cow Pub which closed in 2013 and was demolished in 2018. To the rear of the site is an area of open space surrounded by banks of mature trees.

2.2 The site is bounded:

- to the north by residential properties along Deer Croft Crescent, with other residential areas beyond this;
- to the south by New Hey Road, with residential properties in Dunsmore Drive and various playing pitches and Huddersfield New College and Salendine Nook High School beyond this;
- to the east by existing dwellings facing New Hey Road; and
- to the west by vacant land currently being developed for housing and the Salendine Nook Baptist Churchyard, part of which is in use as the Happy Adventures Pre-school.

2.3 The site is around 250m – 300m to the east of Salendine Nook Local Centre, as defined in the adopted Local Plan. New Hey Road is a major arterial route linking Huddersfield Town Centre with Junction 23 of the M62.

2.4 The site does not lie within a Conservation Area but is within close proximity to a number of listed buildings, including 390 and 398 New Hey Road (both Grade II listed, 50m east of the site), and Salendine Nook Baptist Chapel (Grade II listed, 70m west of the site). Many of the trees along the western boundary of the site are protected by Tree Preservation Orders (TPOs), however the proposed site plan (discussed below) seeks to retain these.

Accessibility

2.5 As set out above, the A640 New Hey Road is the main road linking Huddersfield Town Centre with Junction 23 of the M62. There are bus stops on either side of the road, in close proximity to the application site which are served by a range of services, which help to connect the site with Huddersfield Town Centre and areas such as Hebden Bridge and Halifax, as well as the surrounding residential areas. A minimum of 8 buses per hour pass the site, in each direction, giving access to a wide area, including Huddersfield Town Centre.

2.6 The site is also accessible from the surrounding residential areas via a network of pedestrian footways. There are also Advisory Cycle Lane markings on both sides of New Hey Road in the vicinity of the site, and large proportions of the surrounding urban areas of Huddersfield, including the Town Centre, and out to Elland, Greetland, Brackenhall, Blackmoorfoot, Linthwaite, Outlane, and Sowood are within cycling distance of the site.

2.7 As a result of its location on the A640, the application site is easily accessible by private car from areas on the western side of Huddersfield, via a number of other arterial roads.

Planning History

2.8 A planning application for a Lidl foodstore at the site was refused by Planning Committee in December 2019 (ref: 2019/91433, decision notice issued February 2020). The application was refused on three grounds – loss of housing land, adverse impact on the vitality of existing Local Centres, and harm to the character and visual amenity of the area. These reasons for refusal and the updated evidence and justification which has been prepared in response are discussed in greater detail later in this Statement.

2.9 Prior to that, in February 2018, the Council were 'minded-to-approve' an application for the development of 32 residential dwellings on the application site (ref: 2017/93846). However, the Section 106 agreement was not signed, and the planning application was formally withdrawn on 2 October 2018. Notwithstanding this withdrawal, Council Officers' recommendation of approval for the above application confirms Council Officers' views that site is suitable, in principle, for redevelopment.

3.0 The Proposed Development

3.1 The proposed development includes the following:

- a 2,061 sqm gross internal area/1,377 sqm net (sales) Lidl foodstore;
- 113 car parking spaces including 7 disabled spaces, 2 electric vehicle charging points and 8 parent and toddler spaces;
- servicing areas to the side of the store;
- a co-ordinated scheme of landscaping around the site and stone boundary wall on New Hey Road; and
- vehicular access from New Hey Road.

3.2 The new Lidl store would be accommodated within the north-western (i.e. rear) part of the site. The entrance to the store would be located on the south-eastern corner of the building, adjacent to the trolley store, and be linked to parking spaces to the south by a dedicated pedestrian route.

3.3 Vehicular access to the site in approximately the same location as the existing easternmost access point to the former pub, with car parking located to the south and east of the store, between the store and New Hey Road. The western access point would be closed off, and a new right turn lane into the site would be created on New Hey Road.

3.4 A level platform would be created at the site, with a retaining wall to the north and west (rear) of the store, and also a lower retaining wall to the north-east of the site adjacent to the car park. The retaining wall at the rear of the store would rise to around 9m in height and finished in gabion baskets. The gabion baskets will be faced with natural stone reclaimed from the site where possible and will provide an attractive setting for the store.

3.5 The trees to the west of the site which are subject to Tree Preservation Orders (TPOs) will be retained, providing natural screening to any further development which comes forward on land to the west. The stone wall which forms the southern boundary of the site will be retained and extended, with sections of steel balustrade between the brick piers.

Lidl’s Retail Operation

3.6 Lidl has been developing stores throughout the UK since 1994 and currently operates over 800 stores nationwide. Lidl offer high quality products at low prices, as a result of the company’s cross-European bulk buying power, and its efficient approach to store format, staffing levels and management.

3.7 This proposal forms part of a significant development programme in Kirklees, with a number of new stores proposed which will deliver hundreds of new jobs and millions of pounds of investment in the district.

3.8 There are a number of factors which help to limit the impact of Lidl stores on existing town centre shops. These include:

- the limited number of product lines that their stores carry, with customers tending to visit other shops to meet day-to-day convenience retail needs;
- the fact that Lidl stores do not incorporate specialist butchery or delicatessen counters; and
- the comparison (i.e. non-food) goods offer in their stores, which varies significantly from week to week, and changes on a twice weekly basis, thereby dispersing any possible impact across a range of sectors.

3.9 A typical Lidl store will offer circa 2,000 product lines, compared with a typical range of 20,000+ lines in a superstore operated by one of the main convenience retailers. Subject to seasonal variation, Lidl stores dedicate around 20% of floorspace to the sale of 'comparison' goods (non-food) items, with the remaining floorspace being used for the sale of 'convenience' goods. Unlike other foodstore operators, they do not include in-store concessions or other ancillary facilities such as opticians, dry cleaners, bureaux de change or cafes, which also helps to limit their impact upon existing town centres.

3.10 Lidl stores primarily seek to serve the immediate local community in which they are located, both in terms of their shopping function and also in terms of employment. Lidl seek to employ approximately 15 full time and 25 part time staff from their local community, so that they can offer both a friendly and familiar staffing service to customers. They are committed to attracting customers from the local communities in which their stores are located and offer a free phone taxi service in each of its stores to assist those who have mobility difficulties in visiting the store.

4.0 Planning Policy Context

The Development Plan

4.1 The current Development Plan for Kirklees comprises the Kirklees Local Plan (2019). The Local Plan sets the development requirements for the District over the plan period from 2013 – 2031, allocates land for development and identifies sites subject to relevant policies.

4.2 The Policies Map shows that the site is allocated for residential development (site ref: HS38) with an indicative capacity of 32 dwellings. The implications of this designation for the consideration of this proposal are discussed in Section 9.0 of this Statement. The Policies Map also confirms that the site is not located within a designated retail centre, although it is located close to Salendine Nook Local Centre (approximately 250m to the west).

4.3 With regards to retail development, Policy PLP 13 states that main town centre uses shall be located within defined centres (principal town centres, town centres, district centres, and local centres), as shown on the Policies and Town Centre Maps, and as detailed in the shopping centre hierarchy and then in accordance with the sequential test. Policy PLP 13 also states that an impact assessment will be required for all out of centre retail proposals which would provide a floorspace greater than 500 sqm gross.

4.4 The Local Plan also contains a number of policies which are relevant to the consideration of this application. These are summarised below and referred to, where relevant, throughout the remainder of the report:

- Policy PLP 1: Presumption in Favour of Sustainable Development – The council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. The council will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
- Policy PLP 7: Efficient and Effective Use of Land and Buildings - To ensure the best use of land and buildings, proposals should encourage the efficient use of previously developed land in sustainable locations provided that it is not of high environmental value.
- Policy PLP 21: Highway and Safety Access - Proposals shall demonstrate that they can accommodate sustainable modes of transport and be accessed effectively and safely by all users. New development will normally be permitted where safe and suitable access to the site can be achieved for all people and where the residual cumulative impacts of development are not severe.
- Policy PLP 22: Parking - Car parking provision in new developments will be determined by the availability of public transport, the accessibility of the site, location of the development, local car ownership levels and the type, mix and use of the development.
- Policy PLP 24: Design - Proposals should promote good design by ensuring, inter alia, the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape; that they provide a high standard of amenity for future and neighbouring occupiers; and that they provide high levels of sustainability, to a degree proportionate to the proposal.
- Policy PLP 30: Biodiversity and Geodiversity - Development proposals will be required to result in no significant loss or harm to biodiversity in Kirklees through avoidance, adequate mitigation or, as a last resort, compensatory measures secured through the establishment of a legally binding agreement.

- Policy PLP 52: Protection and Improvement of Environmental Quality - Proposals which have the potential to increase pollution from noise, light, odour and other forms of pollution, must be accompanied by evidence to show that the impacts have been evaluated and measures have been incorporated to prevent or reduce the pollution, so as to ensure it does not reduce the quality of life and well-being of people to an unacceptable level or have unacceptable impacts on the environment.

National Planning Policy Framework

4.5 The National Planning Policy Framework (NPPF, February 2019) sets out the Government's economic, environmental and social planning policies for England.

4.6 At the heart of the Framework is a presumption in favour of sustainable development. The revised NPPF confirms that significant weight should be placed on the need to support economic growth and productivity, taking into account both local needs and wider opportunities for development (paragraph 80).

4.7 Paragraph 85 of the NPPF makes clear that planning policies should promote the long-term vitality and viability of centres, by allowing them to grow and diversify, in a way that responds to rapid changes in the retail and leisure industries, allows a suitable mix of uses and reflects their distinctive characters.

4.8 It also emphasises the importance of meeting needs for retail, leisure, office and other main town centre uses over a ten year period, and ensuring that this is not compromised by limited site availability. Where suitable and viable town centre sites are not available for such uses, policies should allocate appropriate edge of centre sites that are well connected to the town centre.

4.9 Planning applications for main town centre uses (such as retail) which are not in a defined centre and are not in accordance with an up-to-date development plan should be subject to a sequential test (Paragraph 86). Such uses should be located in town centres, followed by edge-of-centre locations and, only if suitable sites are not available, should out-of-centre sites be considered. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored (paragraph 87).

4.10 Proposals for new retail and leisure uses outside of town centres, which are not in accordance with an up to date plan, should be subject to an impact assessment where the development is over a proportionate, locally set floorspace threshold (or over 2,500 sqm, where there is no such threshold). The impact assessment should consider:

- 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) (Paragraph 89).

4.11 Paragraph 120 of the revised NPPF states that planning policies and decisions need to reflect changes in the demand for land. It confirms that, where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

- they should, as part of plan updates, re-allocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, de-allocate a site which is undeveloped); and

- in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.

Planning Practice Guidance

4.12 Planning Practice Guidance ('PPG') supports the NPPF. It provides guidance on how to ensure the vitality of town centres and advocates a positive approach to meeting needs, making clear that local planning authorities should assess and plan to meet the needs of main town centre uses in full. It notes that:

"It may not be possible to accommodate all forecasted needs in a town centre: there may be physical or other constraints which make it inappropriate to do so. In those circumstances, planning authorities should plan positively to identify the most appropriate alternative strategy for meeting the need for these main town centre uses, having regard to the sequential and impact tests."

4.13 In relation to the sequential approach, the PPG requires local authorities to consider whether the identified need for main town centre uses can be accommodated on town centre sites. This should consider the suitability, availability and viability of sites, with particular regard to the nature of the need that is to be addressed.

4.14 In addition, the PPG states that the use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements, which mean that they may only be accommodated in specific locations. It also recognises that, as promoting new development in town centre locations can be more expensive and complicated than elsewhere, local planning authorities need to be realistic and flexible in terms of their expectations.

4.15 In relation to application of the impact test, the PPG sets out a number of steps which should be taken. These include establishing the state of existing centres and current shopping patterns, determining the appropriate time frame for assessing impact and considering a range of plausible scenarios. Where wider town centre developments or investments are in progress, the PPG recognises that it will be appropriate to assess the impact of applications on that investment.

Summary

4.16 The site is allocated in the Local Plan for residential development, and this proposal therefore represents a departure from the development plan. This Statement goes on to highlight the work that has been undertaken to assess the viability of the site for residential development and how that demonstrates that the site cannot viably be developed for residential purposes.

4.17 Importantly, the revised NPPF confirms that significant weight should be placed on the need to support economic growth and seeks to encourage the re-use of previously developed sites. Policy PLP 1 also states that the Council will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

4.18 The site is located outside but on the edge of Salendine Nook Local Centre. In accordance with Policy PLP 13, the application is required to be accompanied by a sequential assessment, and, as the store is over 500sqm, a retail impact assessment. These assessments have been undertaken and are discussed in Sections 7.0 and 8.0.

5.0 Retail Context

Local Retail Hierarchy

5.1 Huddersfield is the largest town centre in Kirklees and serves both the town itself and other surrounding settlements. It provides a range of retail, services and commercial uses which meet the needs of local residents, as well as acting as a focus for other important community facilities. Below Huddersfield, there are a number of other town centres in the local retail hierarchy which, whilst smaller, also help to meet the needs of their respective catchment areas. These centres include Dewsbury, Heckmondwike, Batley, Cleckheaton and Holmfirth.

5.2 In relation to north-west Huddersfield in particular, the largest centres comprise Lindley and Marsh (both identified as District Centres in the Local Plan). There are also a number of local centres, including Salendine Nook, Birchencliffe and New Hey Road/Acre Street. However, these centres generally perform a localised role in catering for the day to day needs of the surrounding residential areas, as well as some passing trade, and primarily comprising of small and/or independent operators.

5.3 Existing foodstore provision on the north-western side of Huddersfield is limited, with the largest store in this area (Sainsbury's, at Salendine Nook) comprising just 700 sqm net (approx.) convenience and comparison goods floorspace. Convenience retail patterns are therefore influenced by a range of medium and large sized foodstores located elsewhere, which draw a significant proportion of expenditure generated in north-west Huddersfield. Such stores include Tesco, Sainsbury's and Lidl stores, on the outskirts of the town centre, as well as Aldi and Asda stores elsewhere.

5.4 In addition to Huddersfield Town Centre, and the other town centres mentioned above, there are a number of other destinations which attract significant comparison goods spending. These include Great Northern Retail Park, Leeds Road Retail Park and Gallagher Retail Park, located to the north, north-east and east of Huddersfield Town Centre respectively.

Existing Centres in the Primary Catchment Area

Salendine Nook Local Centre

5.5 Salendine Nook Local Centre is located approximately 4.5 km to the west of Huddersfield Town Centre and around 250-300m from the application site, adjacent to the junction of New Hey Road with Moor Hill Road. The centre helps to meet the day to day convenience retail and service needs of residents of the surrounding area of Salendine Nook, although it also attracts passing trade, given its location on New Hey Road.

5.6 The main focus of the centre is the Salendine Shopping Centre, a small covered centre, anchored by a Sainsbury's supermarket of around 700 sqm net floorspace. There are also various smaller units, including a florist, chemist, hair salon, café, post office and two hot food takeaways. Although its size limits the extent to which it can meet weekly food shopping needs, the Sainsbury's store is (on the basis of up to date household survey evidence) trading very strongly - achieving a turnover level (c. £28,000 per sqm) around 260% of the Sainsbury's company average (c. £11,000 per sqm), based on household surveys undertaken to inform the impact assessment summarised later in this report – and generates spin-off trade to the benefit of the other units within the centre.

Table 5.1 Mix of Uses, Salendine Nook Local Centre

Use Type	No. of Units	Percentage of Units
Convenience	1	8%
Comparison	5	38%
Service	5	38%
Misc	2	15%
Vacant	0	0%
Total	13	100%

5.7 The centre is conveniently accessible by public transport, as there are a number of bus stops dispersed along both New Hey Road and Moor Hill Road, and there is dedicated surface car parking to the front of the Sainsbury's store. At the time of our original site visit, the centre was busy, with good levels of footfall, and the car park being around three quarters full. We have subsequently re-visited the centre on several occasions, and the Sainsbury's store has been busy and the car park close to capacity on each occasion.

5.8 There are currently no vacant units within the centre, which is also reflective of its current health and the demand for retail and commercial space there. Salendine Nook Centre is therefore performing well at its level in the retail hierarchy. While it clearly plays an important role in meeting the day to day retail and service needs of residents in the surrounding area, the centre is modest in scale and would appear to have limited capacity to meet the needs generated by the growing residential population in the local area.

Lindley District Centre

5.9 Designated as a District Centre in the Local Plan, Lindley includes a range of uses dispersed along Lidget Street extending to Acre Street, around 1 km to the north-east of the application site. The majority of units within the centre comprises comparison retail and services uses, most of which are small in scale and/or independent traders. There are nine convenience retail uses in the centre, comprising two bakeries and confectioners, a butcher, a newsagent, an off-licence, a wine shop, a beer shop, a zero-waste food shop, and one national convenience store, Sainsbury's Local (comprising around 180 sqm net floorspace).

Table 5.2 Mix of Uses, Lindley District Centre

Use Type	No. of Units	Percentage of Units
Convenience	9	19%
Comparison	16	33%
Service	21	44%
Misc	1	2%
Vacant	1	2%
Total	48	100%

5.10 The centre is conveniently accessible by public transport, as well as by foot and car, and benefits from on street parking along Lidget Street itself, as well as a small car park located at the junction of Holly Bank Road, which allows 2 hours free parking. At the time of the site visit, the centre was busy with good numbers of pedestrians along Lidget Street in particular, and provides a relatively attractive shopping environment, primarily comprising stone-built terrace shop units.

5.11 At the time of Lichfield's most recent survey there was only one vacant unit within the centre, which is significantly below the national average - and an improvement from our previous survey which found four vacant units. This reflects the current health of Lindley District Centre, and its important role in meeting day to day needs of the surrounding residential area.

New Hey Road/Acre Street Local Centre

5.12 This Local Centre is located around 2 km to the west of Huddersfield Town Centre and 1.5 km to the east of the application site. It comprises a number of small shop units clustered around the junction between New Hey Road and Acre Street, as well as a small number of shops further along Acre Street, which serve the residents within the surrounding areas. As shown in Table 5.3, the majority of the uses within the centre are services, including a number of takeaways and hairdressers, although there are two small convenience uses, comprising a Premier store and independent newsagents, and a public house. Although only meeting the basic needs of local residents, as well as attracting some passing trade, the centre is performing well, with only one vacant unit.

Table 5.3 Mix of Uses, New Hey Road/Acre Street

Use Type	No. of Units	Percentage of Units
Convenience	2	15%
Comparison	1	8%
Service	9	69%
Misc	0	0%
Vacant	1	8%
Total	13	100%

Birchencliffe Local Centre

5.13 Birchencliffe Local Centre is located on Halifax Road, approximated 3.7km north west of Huddersfield Town Centre and 1. 75 km to the north of the application site.

5.14 These include a Tesco Express convenience store – which appeared to be trading well at the time of the site visit, and also picks up some passing trade - Greggs bakery, a restaurant, hair salon, estate agents and solicitors. Although small, in terms of the numbers of uses present, Birchencliffe Local Centre helps to meet the basic needs of local residents and is easily accessible by both public transport and on foot from the residential areas to the south. There are no vacant units within the Centre.

Table 5.4 Mix of Uses in Birchencliffe Local Centre

Use Type	No. of Units	Percentage of Units
Convenience	2	33%
Comparison	0	0%
Service	4	67%
Misc	0	0%
Vacant	0	0%
Total	6	100%

Other Existing Provision

5.15 As stated above, Huddersfield Town Centre is the main, and indeed largest, town centre within Kirklees. It is the principal focus for comparison retailing within the district, and contains a range of non-food shops, along with a number of foodstores, service uses, and various leisure, tourism, office and other commercial/community facilities.

5.16 Marsh is classed as a district centre in the Local Plan and is located around 2km to the east of the Lidl application site. It comprises a range of generally small-scale retail and service uses and, whilst the majority of the units are independents, there are a small number of national multiples, including KFC, Subway and the Co-op.

5.17 Whilst foodstore provision on the north-western side of Huddersfield is limited, as identified above, and there are no out-of-centre stores of significance within that area, there are a number of medium and large foodstores located further afield, which attract convenience retail spending from within the catchment area. These include:

- Aldi, at River Street/Scar Lane, in Milnsbridge District Centre (which is around 2.6 km from the application site, and comprises around 1,000 sqm net sales area);
- Morrisons, at Eastgate, in Elland (3.5 km from the site, and 2,700 sqm net sales area);
- Aldi, at Beck Road, Huddersfield (which is around 4.2 km from application site and also comprises around 1,000 sqm net);
- Sainsbury's, at Market Street, within Huddersfield Town Centre (4 km from the site and providing 3,300 sqm net);
- Tesco, at Viaduct Street within Huddersfield Town Centre (4 km from the site and 3,200 sqm net);
- Lidl, at Castlegate, on the edge of Huddersfield Town Centre (around 4.2 km from the application site and approximately 1,100 sqm net sales area);
- Sainsbury's, at Southgate, on the eastern edge of Huddersfield Town Centre (4.7 km from site and circa 6,200 sqm net area);
- Asda, at Bradford Road, on the northern side of Huddersfield (5.7 km from the site and comprising 5,400 sqm net); and
- Lidl, at Wakefield Road, to the east of Huddersfield Town Centre (5.1 km from the site and providing circa 1,200 sqm net).

Committed and Proposed Developments

5.18 Planning permission was granted on 29 January 2020 for the development of a new Aldi foodstore on the Oakes Mill site, New Hey Road (ref. 2019/62/91656/W), around 1.1 km to the east of the Lidl application. This store will comprise 1,785 sqm gross area. Pre-commencement conditions are currently being discharged prior to works commencing on site but it currently remains unclear whether / when this permission will be implemented

5.19 A new Lidl store of around 2,000 sqm gross floorspace is proposed as part of a wider mixed-use development on the former College Site (ref. 2018/62/92647/W), to the north of Trinity Street and west of Huddersfield Town Centre, around 3.5 km to the east of the application site (and outwith the defined PCA). If approved, the new Lidl store would replace the company's existing facility at Castlegate and would complement any new store approved and implemented on the former Spotted Cow Public House site – serving a different catchment area, focused upon areas to the north and west of Huddersfield Town Centre. The application is expected to be determined in October 2020.

Kirklees Retail Capacity Study Update (2016)

5.20 The Kirklees Retail Capacity Study Update (2016) was prepared by WYG on behalf of Kirklees Council. It provides an update of the 2014 study, in respect of the future need for new retail floorspace, using the same (2013) household shopping surveys undertaken as part of the 2014 work, although with more recent base data and forecasts in respect of population and expenditure (which take into account planned housing growth).

5.21 The study indicated that, cumulatively, convenience goods floorspace across Kirklees was effectively 'over-trading' (ie trading at levels above company average or anticipated benchmark levels) by £134.8m at 2016. A significant proportion of this overtrading was occurring in Zone 2, which includes the urban area to the north of Huddersfield town centre. The subject site is located within Zone 5, where the study found a relatively equal balance between benchmark turnover and estimated turnover for convenience stores, although the Aldi at Milnsbridge (around 2.6 km to the south of the site) was identified as over-trading by around £7.5m.

5.22 Although the study did not identify any requirement for additional convenience goods floorspace in Zone 5, the application site is located towards the edge of Zone 5, and close to Zones 1 and 2. A floorspace requirement of between 4,600 sqm and 7,200 sqm net new convenience goods floorspace at 2016, increasing to between 5,700 sqm and 8,800 sqm net at 2031, was identified in Zone 2 in particular.

5.23 It is important to note that the study was undertaken on the basis that existing shopping patterns - which currently involve a significant proportion of local residents in north-west Huddersfield travelling to facilities outside of the local area - would be maintained. Furthermore, although the study highlights the new Tesco Express and Aldi stores which have been developed in Birchencliffe and Slaithwaite within Zone 5, the former is small in scale, and the latter is located some distance - around 7 km by road, equating to around 15 minutes' drive - from the site of the proposed new Lidl store. Neither of these developments have therefore significantly improved the accessibility and availability of medium or large sized foodstores to the north-west Huddersfield area.

5.24 As explained in the introduction, new household shopping survey have been undertaken as part of the cumulative impact assessment summarised in this report. These provide a more up to date indication as to existing shopping patterns in the Huddersfield area and the current performance of existing stores.

Summary

5.25 There are a number of defined local centres within the Primary Catchment Area of the proposed development and, whist the majority of the units within these centres are small and/or local traders - and meet only the day to day needs of local residents – they are all performing well at their respective levels in the local retail hierarchy. Indeed, across the four district and local centres within the PCA (Salendine Nook, Lindley, New Hey Road / Acre Street and Birchencliffe), there are just two units currently vacant. This reflects the strength of their performance but also the relatively modest range and choice of facilities in the area and the limited scope for existing provision to grow in response to the growing population within the area.

5.26 Significantly, there are no foodstores of any significant size within this area and, with the exception of the existing Sainsburys store at Salendine Nook Local Centre - which comprises just 600 sqm net (convenience) sales area and is currently trading very strongly - convenience retail uses are mostly limited to independent and/or specialist operators, with a small number of national multiples, such as Tesco Express and Sainsburys Local.

5.27 Looking further afield, there are a number of other large and medium sized foodstores which have a significant influence over food and non-food shopping patterns across the north-western Huddersfield area. These include Sainsbury's, Asda, Tesco, Aldi and Lidl stores in Huddersfield, as well as Morrisons in Elland, most of which trade strongly and above company average levels

5.28 While planning permission was recently granted for a new Aldi store on New Hey Road, to the east of the application site, it remains unclear whether / when this permission will be implemented. However, even if it is assumed that this development will be implemented, its turnover potential (£11.8m) is modest relative to the level of 'overtrading' identified in the Council's most recent Retail Study (c.£134m) and is unlikely, on its own, to address the need for new floorspace in north west Huddersfield.

6.0 Methodology

6.1 An assessment of the likely impact of the proposed Lidl foodstore has been undertaken, having regard to a quantitative assessment of the levels of trade diversion forecast upon existing stores and centres, based on household surveys of existing shopping patterns. This assessment takes into account comments by Cushman & Wakefield on that prepared to accompany the previous application for a foodstore on the same site, also having regard to the potential cumulative impact of the proposed store, allowing for the Aldi store approved on the Oakes Mill site. The approach taken as part of the assessment was previously agreed with Officers at Kirklees Council.

Defining a Study Area

6.2 This assessment is focused on stores and centres across the following six zones (also known as the Study Area), which are in turn based on the Retail Capacity Study Update (2016):

- Zone 1 - Huddersfield Central;
- Zone 2 - Huddersfield North;
- Zone 3 - Elland and Brighouse;
- Zone 5 - Huddersfield West;
- Zone 6 - East Kirklees; and
- Zone 7 - South Kirklees.

6.3 Given the location of the subject site, the likelihood that the proposed new retail floorspace would draw the majority of its trade from the western side of Huddersfield, and the relatively limited range of retail provision serving the north-west of the town in particular, Zone 5 has been defined as the Primary Catchment Area (PCA) for the purposes of this assessment.

6.4 It is unlikely that significant number of people will travel from areas closer to, or to the other side of, Huddersfield Town Centre to visit the new store on New Hey Road. This is because there are already two existing stores there, comprising those located at Castlegate and Wakefield Road. There are also proposals for a new Lidl store as part of a mixed-use scheme on a site at Trinity Street which will, if approved and implemented, replace that at Castlegate.

6.5 The assumptions within this assessment reflect Lidl's expectation – in line with their experience nationwide – that they will draw most of their trade from the areas immediately surrounding their stores. They also attract some trade from the wider area, particularly where there is the opportunity to pick up passing trade from those travelling along key routes – in this case, New Hey Road, which links Huddersfield Town Centre and the M62. However, it is unlikely that they will draw significant trade from areas already served by existing discount foodstores.

6.6 Notwithstanding the above, this assessment forecasts the potential trade diversion impacts upon relevant stores located beyond the defined PCA. This includes the Sainsbury's, Tesco and Lidl stores in or around Huddersfield Town Centre, as well as Aldi at Beck Road, Asda at Bradford Road, and the Tesco and Co-op stores further east on New Hey Road.

Sequential Site Assessment

6.7 The methodology adopted in identifying potential alternative sites in the context of the sequential approach has involved:

- consideration of sites allocated for development in the development plan;

- discussions with Officers at Kirklees Council;
- reviewing extant permissions and current applications for retail development; and
- identifying other sites or buildings with potential for development, through an 'on the ground' survey.

6.8 Taking into account the need for flexibility, a thorough assessment has been made to establish the suitability and availability of identified sites to accommodate the retail and leisure uses proposed on the application site. The criteria adopted for the site assessments has been as follows:

- site size - any potential alternative sites would need to be able to accommodate new retail development of a similar scale and nature, with associated parking, servicing and landscaping, taking into account the need for flexibility set out in the NPPF;
- whether the site lies within, or on the edge of, existing centres;
- whether there are any development plan policies relevant to the sites identified;
- whether the sites can be satisfactorily serviced and accessed by vehicles;
- whether there are any extant permissions for development on the sites identified, and details of any other proposals;
- whether there are any land assembly issues (e.g. multiple ownership) which could constrain the potential for future development;
- what the current land uses are at each site, and whether there is a requirement for their relocation;
- whether the site is likely to be commercially attractive to operators; and
- other potential constraints to development, for example conservation area or listed building status, tree preservation orders, topography, etc.

Impact Assessment

Population and Expenditure

6.9 Levels of population within each zone of the defined Study Area have been based on estimates obtained from Experian (based in turn on the 2011 Census). These estimates have then been projected forward for over the period to 2030 using Sub-National Population Projections and Mid-Year Estimates provided by the Office of National Statistics As set out in Table 1 of Appendix 2, the population within the Study Area as a whole is forecast to increase from 307,809 in 2020 to 318,307 in 2030 (and increase of around 10,400 persons/3%). The population of Zone 5/the PCA in particular is forecast to increase by around 1,900 persons (also around 4%) over the same period, from 54,563 to 56,493.

6.10 Levels of convenience and comparison goods expenditure per capita in 2018 in the Study Area zones have also been sourced from Experian. Forecasts set out in their Briefing Note 17 (February 2020) have been used, in order to project comparison goods expenditure forward over the period to 2030. A proportion of expenditure per capita has been deducted to reflect expenditure via non-store retail sales (primarily internet purchases), also using information within the above Briefing Note. This excludes purchases made online which go through actual retail stores (for example click and collect) and therefore still generate a demand for physical retail floorspace.

6.11 In the context of the above, Table 3 in Appendix 2 illustrates forecast growth in total convenience goods expenditure across the Study Area, including within the PCA. This table illustrates that convenience goods expenditure within the Study Area as a whole will increase by around £17.0m (around 3%) between 2020 and 2030 across the Study Area, from £616.9m to £633.0m. Expenditure within the PCA is forecast to increase by around £3.3m over the same period, from £114.6m to £118.0m in 2030.

6.12 Experian's short-term expenditure growth projections (2020 and 2021) for retail and leisure, as set out in their Retail Planner Briefing Note 17.0 (February 2020) do not take into account the coronavirus pandemic. However, the length of the crisis, potential further lockdowns and likely recovery period are all unclear, and the longer-term structural implications are harder to predict and quantify at this stage. Office of National Statistic (ONS) monthly sales volume information for Great Britain indicates that total retail sales volumes were over 22% lower in April 2020 compared with the pre-Covid-19 position in February 2020 (seasonally adjusted). However, the July and August 2020 sales volumes had recovered to pre-Covid levels, with the August figure now 4% higher than the pre-Covid figure in February.

6.13 Furthermore, the food sector experienced a 10% growth in sales in March, in part, due to panic buying at the start of the crisis. Food sales volumes have been consistently higher than the February level during March to August. Although foodstore online sales doubled during May and June, they still represent a relatively small proportion of total sales in this sector, with the majority of these online sales still going through physical stores.

Floorspace and Turnover of Existing Retail Floorspace

6.14 Net retail floorspace data for existing stores and centres within the PCA has been obtained from a range of sources, including information provided by the Valuation Office Agency (VOA) website and the Oxford Retail Consultants (ORC) Storepoint directory. This floorspace data relates to the proportion of stores dedicated to the sale of convenience goods, in order to undertake a 'goods-based' quantitative analysis.

6.15 The convenience goods turnover of the main centres and stores in the PCA, as well as other relevant stores within the wider Study Area, originating from within the Study Area, has been estimated using the results of a telephone survey of household shopping patterns undertaken by NEMS in October 2019. This approach takes into account comments made by the Council's retail advisors (Cushman & Wakefield) on the assessment originally submitted with the previous Lidl application and, in particular, concerns expressed in relation to the use of turnover information within the Kirklees Retail Study - which was based on household surveys undertaken in 2013.

6.16 A total of 675 no. surveys were undertaken across the six zones within the Study Area. The results of the surveys relating to main and top-up food and grocery shopping have been weighted and combined to estimate existing convenience goods shopping patterns across the study area. The resultant shopping patterns – which were, in turn, based on the 'weighted' version of the survey results, which have been adjusted take into account the demographic profile of the respondents - have then been applied to the total quantum of convenience goods expenditure within each zone, in order to provide an estimate of the turnover of the main stores and centres within the Study Area.

6.17 As part of these turnover estimates, an allowance for inflow of convenience goods expenditure into the Study Area, from residents living outside of this area, has also been made. This takes into account spending at facilities within the Study Area by those visiting friends and family, people on holiday in the area, those working (but not living) in the area, and people passing through the area on route to destinations further afield.

Floorspace and Turnover of Committed Aldi Store

6.18 In forecasting the turnover of the new Aldi store approved on the Oakes Mill site, it has been assumed that:

- the 1,785 sqm gross store would have a net sales area of 1,315 sqm;
- around 85% of this net sales area (1,118 sqm) would be used for convenience goods sales; and
- the convenience goods sales areas will achieve a convenience goods turnover to floorspace ratio of £10,542 per sqm (in 2018 prices), based on Aldi's latest company average, again sourced from Global Data.

6.19 The total net sales area applied for Aldi as part of this assessment (1,315 sqm) is higher than that used in the assessment undertaken to accompany that application (1,146 sqm), which excludes areas around the checkouts and other circulation space. This is because the Global Data turnover figures used as part of the assessment summarised here are derived from the total sales areas of stores (including this additional space).

6.20 Notwithstanding this, Table 6 (c) illustrates that it is therefore forecast that the proposed Aldi store would achieve a total convenience goods turnover of £11.7m. Table 6 (d) illustrates that 50% of this turnover would be from the PCA/Zone 5, equating to £5.9m, with 45% (£5.3m) originating from the other Study Area zones, and the remaining 5%/£0.6m) coming from beyond the Study Area. These assumptions reflect a range of factors, including the proximity of the proposed store to other study area zones (outwith the PCA/Zone 5).

Floorspace and Turnover of Proposed Development

6.21 In forecasting the turnover of the proposed Lidl foodstore, it has been assumed that:

- the 2,061 sqm gross store would have a net sales area of 1,377 sqm;
- 80% of this net sales area (1,102 sqm) would be used for convenience goods sales; and
- the convenience goods sales areas will achieve a convenience goods turnover to floorspace ratio of £10,542 per sqm (in 2018 prices), based on the company average of Lidl, as sourced from Global Data.

6.22 As illustrated in Table 6 at **Appendix 2**, it is therefore forecast that the proposed Lidl foodstore would achieve a total convenience goods turnover of £11.6m. Table 6 (b) illustrates that 70% of this turnover would be from the PCA, equating to £8.1m, with the remainder of the turnover (25%/£3.5m) coming from beyond this area.

6.23 In practice and taking into account the current trade draw of the existing Sainsbury's at Salendine Nook, it is possible that the new Lidl could draw a more significant proportion of its trade from beyond the PCA. Should this be the case, then it is likely that the impacts resulting from the proposed Lidl store upon stores within the PCA would be lower than forecast in this assessment.

Retail Impact

6.24 An assessment of the impact of the proposed Lidl store has been undertaken, when considered both in isolation, and alongside the committed new Aldi facility on the Oakes Mill site. This has regard to a quantitative assessment of the levels of trade diversion forecast upon existing stores and centres as a result of the proposed stores.

6.25 It also considers the impact of the proposed Lidl store upon planned investment in centres and upon the vitality and viability of existing centres, taking into account consumer choice. In particular, it considers impact over the period of five years from the time of the application (i.e. up to 2025 - the Design Year), in line with the NPPF and PPG. This quantitative assessment is based upon levels of population and retail expenditure within the defined Study Area, as set out above. It is based upon an assessment of the likely origin of the turnover of the proposed new retail floorspace, and the likely trade draw from existing facilities, as well as that of committed developments.

6.26 The estimation of the origin of the turnover of the proposed developments reflects their scale, nature and accessibility, as well as the existence and accessibility of the main competing facilities. The assessment of impact then takes into account the extent to which the new retail floorspace would draw trade from the other retailers, located both within and beyond the PCA. This has regard to the location and characteristics of competing facilities, and the nature of the retail offer in these stores, compared with that which would be on offer at the proposed development.

7.0 Sequential Site Assessment

Policy Context

7.1 The application site is located around 250-300m walk from the nearest defined centre (Salendine Nook Local Centre) which is accessible via the pedestrian footway along the northern side of the A640 New Hey Road. On this basis, and given that the site is edge-of-centre in NPPF terms, only in-centre sites would be sequentially preferable to the application proposals. However, in order to be robust, this assessment has also considered potential alternative sites on the edge of existing centres, in terms of their suitability and availability to accommodate the proposed development.

7.2 Taking into account the extent of the Primary Catchment Area, as defined above, sites within the following centres should be considered as part of this assessment:

- Lindley District Centre;
- Salendine Nook Local Centre;
- Birchencliffe Local Centre; and
- New Hey Road/Acre Street Local Centre.

7.3 The NPPF states that applicants and local authorities should demonstrate flexibility on issues such as format and scale. In this context, where alternative sites are to be considered, their suitability should be assessed in terms of their physical capability to accommodate the form of development proposed in the application, having demonstrated flexibility. This approach is consistent with recent High Court decisions.

Assessment of Potential Alternative Sites

Salendine Nook Local Centre

Land north of New Hey Road

7.4 The site lies to the north of New Hey Road and immediately west of the application site, on the edge of Salendine Nook Local Centre. It comprises approximately 0.61 hectares.

7.5 The site is too small to accommodate the proposed development or a development of comparable form and scale.

7.6 It is also allocated for housing within the adopted Local Plan (Site HS33) and an outline application was approved on appeal in May 2016 for residential development. Since then, a reserved matters application for 23 dwellings was approved in October 2018. The site has now been built out for housing and is known as Whinfield Park.

7.7 On this basis, the site is not available for the development proposed in the current application.

Land east of Celandine Avenue

7.8 The site is located between Celandine Avenue (to the west) and Dunsmore Drive (to the east) and comprises approximately 1.2 hectares of open space to the south of the A640 New Hey Road. It is around 150m walking distance from Salendine Nook Local Centre and, as an edge of centre site, is not sequentially preferable to the application site, which is also edge of centre.

7.9 Furthermore, the site forms part of a wider Urban Greenspace (ref. UG136) allocation under Policy LP61 of the adopted Local Plan which will, where appropriate, be safeguarded and enhanced. In this context, the majority of the site is in use as playing fields, as well as a playground located to the far northern end of the site adjacent to New Hey Road, and the wider allocation accommodates the recreation space associated with Salendine Nook High School and Huddersfield New College. It also performs an important role in providing recreational, amenity space for residential communities within the north-western part of Huddersfield.

7.10 On this basis, the site is not considered either suitable or available to accommodate the proposed development.

Birchencliffe Local Centre

Land off Yew Tree Road

7.11 The site comprises approximately 0.4 hectares of open space located to the south of Yew Tree Road and east of Halifax Road. The site forms part of a wider Urban Greenspace allocation within the adopted Local Plan (ref. UG123) and is currently in use as playing fields. As with land east of Celandine Avenue at Salendine Nook, it is considered an edge of centre site, and not sequentially preferable to the application site.

7.12 The only access to the site is through an informal footpath from Yew Tree Road and the site cannot be accessed from Halifax Road due to a steep drop. In addition, the site is too small for the application proposals, which would occupy a site of around 1.0 ha. In this context, given the associated access constraints, and the current allocation as Urban Greenspace, the site is neither suitable nor available for the proposed development.

Land East of Halifax Road

7.13 This site lies adjacent to the above land off Yew Tree Road, to the east of Birchencliffe Local Centre, and is intersected by both Yew Tree Road and Burn Road. It comprises of 16.8 hectares of primarily agricultural land and open space.

7.14 It is allocated in the Local Plan for residential development (ref. HS35), with planning permission (ref. 2017/62/90180/W) being granted in October 2017 for 95 homes. This permission, which relates to 7.8 ha of the wider allocation, has since been implemented by Harron Homes and the development is called Oaklands Heath. There is also an application currently pending determination on part of the site for 30 no, new dwellings (ref. 2020/62/90942/W).

7.15 This is a large strategic site and only parts of the site are located within 300m walking distance of Birchencliffe Local Centre, as defined in the adopted Local Plan. As such, and given that only parts of the site could, at best, be considered edge of centre, it is not sequentially preferable to the application site. In addition, given the site’s allocation for housing, and the recent development by Harron Homes, it is likely to come forward for an alternative form of development, in line its development plan allocation.

7.16 On this basis, it is considered that the site is neither suitable nor available for the proposed retail development.

Lindley District Centre

Land south of Thomas Street

7.17 The site is bounded by Thomas Street to the north, Thorncliffe Street to the east and Brian Street to the South. It is located adjacent to Lindley Local Centre and, as an edge of centre site in policy terms, is not sequentially preferable to the application site at New Hey Road.

7.18 The site comprises approximately 0.3 hectares of brownfield land having previously been in use as Council offices, before the buildings were demolished in 2013. An outline application for the erection of 12 semi-detached dwellings was approved in April 2012, although a reserved matters application was not pursued and the 2012 permission has now lapsed. In February 2019 an application (ref. 2019/62/90588/W) for erection of a portable building for a temporary pharmacy was approved and this permission was then extended till 8 June 2020. This permission was implemented, although the building has since been removed. In any event, the site is too small and would not be able to accommodate the proposed development.

7.19 On this basis, the site is not suitable to accommodate the proposed development and, in practice, is considered more likely to come forward for residential use.

Land off Daisy Lea Lane

7.20 The site comprises 3.03 hectares of open space to the north of Daisy Lea Lane, to the east of Lindley District Centre. As an edge of centre site, it is not sequentially preferable to the application site.

7.21 The site is allocated as urban greenspace within the emerging Local Plan (ref. UG131) and contains two marked out football pitches. The site is also bordered by residential properties to the east and north, and there is no access into the site for vehicles from the north. Notwithstanding the allocation within the Local Plan and its current use as playing pitches, the site is bordered by a number of mature trees along Daisy Lea Lane which could constrain areas and restrict access to the site. It also lacks visual prominence from a main road, which is likely to impact upon its attractiveness to commercial operators.

7.22 On this basis, and given its allocation as urban greenspace, the site is considered to be neither suitable nor available for the proposed development.

Land south of Union Street

7.23 The site comprises 1.3 hectares of previously developed land located to the south of Union Street and east of School Street West. At its closest point, the site lies approximately 150 metres from Lindley District Centre, although any foodstore developed there would, in practice, be further away. The site is considered, at best, edge of centre, and not sequentially preferable.

7.24 The east of the site is in use as a carpark which is currently well used by visitors and staff at Huddersfield Royal Infirmary, and which is located to the south east of the site. The remainder of the site to the west remains vacant, previously developed land, with two rows of terraced housing, which encroach into the site and would impact upon the configuration of any new development there.

7.25 Due to the shape of the site and the current active use on the eastern part, any development would need to be located towards the west of the site. This would also require access to be taken from Union Street, a narrow, residential road, which is not a through route, and which is unlikely to be suitable for accommodating the flow of traffic which would visit the development.

7.26 In this context, and given that any new foodstore here would lack visual prominence to a main vehicular route – which is key to ensuring the attractiveness of any discount foodstore's attractiveness to customers, and therefore its overall viability - the site is not considered suitable for the development proposed in the current application.

Land west of Lidget Street

7.27 This site is bound by Lidget Street to the east, allotments to the south, residential properties to the west and Woodlands Children's Home to the north. It comprises of 0.8 ha of open space and car parking and is allocated for residential development in the Local Plan (ref. HS37).

7.28 The majority of the site lies adjacent to Lindley District Centre (albeit the access road to the east is located within the centre boundary). As such, and as an edge of centre site, it is not considered sequentially preferable to the application site at New Hey Road.

7.29 In addition, the site is too small to accommodate the proposed development. Furthermore, there are a number of mature trees along the western boundary and access road which could constrain the developable areas and the scope to provide a suitable access to the site (including for service vehicles). It also lacks visual prominence from a main road, which is likely to impact upon its attractiveness (and indeed viability) in commercial terms.

7.30 On this basis, and taking into account the various constraints set out above, the site is not considered to be suitable for the proposed development.

New Hey Road/Acre Street Local Centre

Former Oakes Mill, New Hey Road

7.31 The site comprises 0.8 ha of partially vacant brownfield land to the south of New Hey Road, which includes a large area of hardstanding following the demolition of a former mill building. An existing mill building, which is in partial use, remains onsite.

7.32 The site is located approximately 300m from the New Hey Road/Acre Street Local Centre and, at best, can be classed as an edge of centre location, and therefore not sequentially preferable to the application site.

7.33 In addition, however, planning permission was granted on 29 January 2020 for the development of a new Aldi foodstore (ref. 2019/62/91656/W) on this site. This store will comprise 1,785 sqm gross sales area. Pre-commencement conditions are currently being discharged prior to works commencing onsite. The site is therefore coming forward for an alternative form of retail development and is not available.

7.34 Furthermore, the retail impact assessment summarised in Section 8.0 of this report takes this into account and demonstrates that both the approved Aldi and proposed Lidl can be accommodated within this area of Huddersfield without resulting in any significant adverse impact upon the vitality and viability of existing centres. This reflects a number of factors, including both the strong performance of existing facilities, as well as the significant quantum of spending which is currently 'leaking-out' of the area to stores in other parts of Huddersfield. This means there is a need for further foodstore provision – over and above the approved Aldi – in order to better meet the needs of existing and future new residents.

Site east of Oakes Mill, New Hey Road

7.35 The site comprises 1.3 ha previously developed land located to the south of New Hey Road and east of the Oakes Mill site set out above. It consists of the former Kepak Group food factory, which ceased trading in April 2020. At the time of the site visit, the site was being promoted by CBRE as a development opportunity.

7.36 Although the site is currently being marketed as available, the site is located approximately 250m walking distance from the Acre Street/New Hey Road defined local centre and, therefore, is an edge of centre location, and not sequentially preferable to the application site (which is around 250m walk from Salendine Nook Local Centre).

Vacant Units

7.37 Consideration has also been given to the potential of currently vacant units within each of the local centres to accommodate the proposed development. Based on our site visits in September 2020, there were only two vacant units, comprising one in Lindley and one in New Hey Road/Acre Street.

7.38 However, both units are small in size (i.e. below 100 sqm net). Therefore, there are no currently vacant units which could accommodate the new retail development proposed.

Summary

7.39 Consideration has been given to potential alternative opportunities within and on the edge of Salendine Nook, Birchencliffe, Lindley and Acre Street/New Hey Road Centres, in terms of their potential to accommodate the application proposals. None of the sites identified are suitable and available to accommodate the proposed development, due to a range of issues, including size, location and existing/proposed uses and areas of heritage constraints. In addition, the vast majority of the opportunities identified are not sequentially preferable to the application site.

7.40 As such, there are no sequentially preferable alternative sites which could accommodate the proposed development and the subject application is therefore considered to be compliant with the sequential approach to site selection set out in the NPPF.

8.0 Impact

8.1 The NPPF requires that proposals for new retail and leisure uses in excess of 2,500 sqm, which are not located within an existing centre, and not in accordance with an up to date development plan, 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 wider area.

8.2 The proposed new Lidl foodstore would comprise less than 2,500 sqm gross. However, Local Plan Policy PLP13 requires impact assessments to be carried out in respect of all retail proposals over 500 sqm gross, and therefore an assessment of the subject application proposals against the above issues is set out below.

Investment in Centres

8.3 It is not considered that the proposed new Lidl store at New Hey Road would have any adverse impact upon the ability to bring forward any other investment in existing centres, either within or beyond the PCA. This conclusion reflects a number of factors, including the fact that:

- as demonstrated in the original Planning and Retail Statement, there are no other more sequentially preferable sites, located within centres on the north-western side of Huddersfield, which are suitable and available to accommodate the proposed development;
- the proposed new foodstore is of a different (and more significant) scale to those opportunities for new development/redevelopment and units with scope for refurbishment/re-occupation which do exist within existing centres in this area;
- there is no other planned investment in any of these centres which could be affected by the proposed development;
- although there is a new Lidl store proposed as part of a wider mixed-use scheme on the former Kirklees College site at Trinity Street (the planning application for which is expected to be determined in October 2020, and if approved would replace the company's existing facility at Castlegate), this store would be in addition to any new Lidl store at New Hey Road (and therefore serve a different catchment area, focused upon areas to the north and west of Huddersfield Town Centre); and
- any other schemes which are coming forward or being promoted in other centres in the wider area, are more distant from the application site and/or serve different catchment areas and are highly unlikely to be affected by the current proposals.

8.4 In the absence of any sequentially preferable opportunities which are suitable and available (including within Salendine Nook Local Centre), the subject application proposals represent significant investment in an edge of centre site, which will result in significant benefits for the local area.

Vitality and Viability

Enhancing Consumer Choice

8.5 As explained in Section 5.0, the only foodstore of any significant size in north-west Huddersfield is the existing Sainsbury's store at Salendine Nook Local Centre (c. 700 sqm net). Provision within other existing defined centres comprises a number of convenience stores - including a

Sainsbury's Local facility at Acre Street Local Centre and a Tesco Express at Birchencliffe Local Centre - as well as various other smaller, and primarily independent traders, which meet day to day top-up and more specialist needs.

8.6 Currently, it is estimated that less than half (around 45%) of convenience goods expenditure generated in the PCA is spent at stores within this area, with the remainder flowing to stores further afield. Indeed, leakage to stores further afield is likely to be even greater when considering the north-western side of Huddersfield in isolation (i.e. excluding the Milnsbridge, Slaithwaite and Marsden areas). Such stores include the Lidl stores at Castlegate and Wakefield Road, and Aldi facilities at Beck Road and Scar Lane (Milnsbridge). They also include Sainsbury's superstores within/on the edge of Huddersfield Town Centre at Southgate and Market Street, a Tesco superstore at Viaduct Street and Asda at Bradford Road (around 2.5 km to the north of the town centre).

8.7 There is, therefore, a need to enhance the range of foodstore provision serving existing residential areas on the north-western side of Huddersfield. This need will become greater over time, as new residential population is created through planned new housing development, and existing, unsustainable, travel patterns are exacerbated.

8.8 In this context, a significant amount of new housing development has either recently been completed or is currently planned within a 3km radius of the site - comprising 397 dwellings which have recently been completed and 1,138 dwellings proposed on allocated sites. If planned together as a single development, this level of development is, in itself, of a scale sufficient to support a new foodstore or some form of new local facilities, as is illustrated in the table below.

Table 5 Forecast Convenience Goods Expenditure Generated by New Housing Developments in 2025

New Dwellings	1,535
Persons per Dwelling	2.3
Total New Population	3,531
Convenience Goods Expenditure Per Capita in 2029 (£ per person)	2,088
Total Turnover £m	7.372

8.9 These new dwellings have not specifically been factored-in to either the quantitative assessment summarised further below - and it is recognised that not all of the occupants of the new housing will be new to the area. However, it is important to consider the additional spending upon convenience goods that they could potentially generate.

8.10 Assuming that the new homes are occupied at an average rate of 2.3 persons per dwelling, the occupation of the new housing will generate over £7m additional convenience goods expenditure. This new expenditure is equivalent to around two thirds of the forecast turnover of the Lidl store, and will in practice, play a significant role in helping to offset the trade diversion impacts forecast to be experienced by existing facilities in the area.

8.11 It is considered that this need should have been addressed through the identification of a specific development site/sites(s) during the formulation of the Local Plan. This is particularly the case given the scale of new residential development being promoted in the area - and the number of residents who, in providing feedback as part of the pre-application consultation undertaken by Lidl, expressed concern that no consideration has been given to the needs of the expanding population.

8.12 Notwithstanding this, and in the absence of any sequentially preferable sites which are suitable and available, the proposed development of a new Lidl store on the application site would enhance the existing range of foodstore provision in the area. The application site is ideally situated in order to meet these needs, given its location, central to the various new housing developments. It would reduce the need for residents to travel to stores further afield, including by private car, facilitating more sustainable travel patterns and retaining more spending in the local area.

8.13 The new Lidl store would also help to encourage linked trips with existing facilities within Salendine Nook Local Centre, complementing, rather than competing directly with, existing provision within the centre. Such provision includes the Sainsbury's store there, which is currently performing very strongly and would continue to meet more day to day and top-up needs, serving a different sector of the market to the new Lidl facility.

8.14 Whilst planning permission has recently been granted for a new Aldi store on the former Oakes Mill site, just over 1 km to the east of the application site, it has been demonstrated further below that, even taking into account this approved development, the proposed new Lidl store would not have any significant adverse impact upon existing centres in terms of trade and turnover. Furthermore, given the extent of provision elsewhere in Huddersfield – and the significant level of expenditure flowing to such facilities further afield – it is clear that there is scope for more than one new foodstore serving the western side of the town. This is confirmed through the capacity exercise summarised below.

8.15 The potential impact of the proposed new Lidl store upon the vitality and viability of existing centres should also be viewed in the context of a number of factors. These include:

- the fact that existing convenience retail provision within existing centres in north-west Huddersfield is generally small in scale, and would continue to perform a complementary role alongside the new foodstore in serving top-up and more specialist food shopping needs;
- the strong trading performance of existing foodstores within the PCA - including the existing Sainsbury's store at Salendine Nook (estimated to be achieving a convenience goods turnover of around 260% of Sainsbury's company average, based on recent household surveys);
- the fact that the majority of uses within these centres, including the large proportion of service and other leisure and community uses, would remain unaffected by the development. As explained in Section 3.0 of this Statement, unlike other foodstore operators, Lidl does not include in-store concessions or other ancillary facilities such as opticians, dry cleaners, bureaux de change or cafes, which helps to limit the impact upon existing town centres, such as the range of uses additional to Sainsbury's at Salendine Nook, for example;
- the low number of vacant units located within existing defined centres on the north side of Huddersfield (just one each in Lindley and New Hey Road/Acre Street, and none in either Salendine Nook or Birchencliffe); and
- as explained further below, the fact that any diversion of trade will be spread across a range of stores in the surrounding areas - including those both within and outside of existing defined centres - reflecting the significant proportion of spending which is currently leaking out of the PCA to such facilities.

8.16 In the context of the above, it is not considered that the development proposed would have any significant adverse impacts, in terms of town centre vitality and viability and, in practice, would have a significant positive impact in terms of enhancing local consumer choice in the north-west Huddersfield area.

Trade and Turnover

8.17 The methodology used as part of this impact assessment and a summary of the population and expenditure forecasts and flows can be found in Section 6.0 of this Statement. The assessment is based on the Study Area described in Section 6.0 and illustrated on Lichfields Drg. No. GIS\LE\50831\01-03 at **Appendix 1**. In summary:

- Tables 1 to 3 in **Appendix 2** illustrate levels of population and convenience goods expenditure in the Study Area over the period between 2020 and 2030;
- Tables 4 and 5 illustrate convenience goods expenditure flows to existing stores and centres, both within and beyond the PCA, in 2020 and 2025, before any new development;
- the forecast turnover of the committed Aldi store is set out in Table 6;
- Table 7 illustrates convenience goods expenditure flows in 2025, following implementation of the committed Aldi;
- the forecast turnover of the proposed new Lidl store is set out in Table 8;
- Tables 9 and 10 illustrate expenditure flows in 2025 and 2030, following implementation both the committed Aldi and proposed new Lidl stores; and
- Table 11 illustrate the trade diversions likely to occur from the proposed Lidl store, considered both in isolation and cumulatively with the committed Aldi.

Expenditure Capacity

8.18 Ahead of summarising the trade diversion impacts forecast to result from the proposed new foodstore development, it is also helpful to consider levels of expenditure capacity available to support new development in the local area. The table below, therefore, provides a summary of convenience goods expenditure capacity within the defined PCA (i.e. Zone 5), by comparing the estimated turnover of existing stores/centres (which is based on the new household survey results) against their benchmark (i.e. or company average/expected) level of turnover.

Table 6 Convenience Goods Expenditure within the PCA (2018 Prices)

		Total Turnover in 2020 (No New Development)			Total Turnover in 2025 (No New Development)		
Centre/Location	**Floorspace (sqm)**	**Estimated Turnover (£m)**	**Benchmark Turnover (£m)**	**Difference (£m)**	**Estimated Turnover (£m)**	**Benchmark Turnover (£m)**	**Difference (£m)**
Lindley Large Local Centre	409	3.258	3.068	0.191	3.304	3.120	0.184
Salendine Nook Local Centre	660	18.559	7.160	11.399	18.817	7.282	11.535
Birchencliffe Local Centre	316	0.747	3.160	-2.413	0.757	3.214	-2.457
Aldi, Milnsbridge District Centre	791	23.036	8.339	14.698	23.357	8.481	14.875
Other Stores/Centres, PCA		27.678	27.678	0.000	28.065	28.151	-0.086
Sub-Total (Primary Catchment Area)		**73.278**	**49.404**	**23.874**	**74.301**	**50.249**	**24.052**

8.19 As the table above illustrates, there is currently estimated to be £23.8m expenditure capacity available to support new convenience goods retail floorspace within the defined PCA, with this being forecast to increase slightly to £24.1m by 2025. These levels of expenditure capacity reflect the strong performance of existing foodstores within the PCA - including the existing Sainsbury's store at Salendine Nook (estimated to be achieving a turnover of around 260% of Sainsbury's company average and Aldi at Milnsbridge (c. 275% of the Aldi company average).

8.20 The expenditure capacity identified is more than sufficient to accommodate the convenience goods turnovers of the proposed Lidl and Aldi stores which would be drawn from beyond the PCA (around £14.0m). It also helps to confirm that there is sufficient expenditure capacity to support both the Aldi and Lidl developments in the area, without having any significant adverse impact upon existing stores and centres within the PCA (including Sainsbury's at Salendine Nook).

Trade Diversion Impacts

Impact of Lidl

8.21 As set out in Section 6.0, the forecast trade diversions have regard to the scale, nature and accessibility of both the proposed developments and existing competing facilities.

8.22 As illustrated in Table 11 at Appendix 2, the most significant trade diversion impact forecast to result from the proposed Lidl (15%) would be upon the committed Aldi store on the Oakes Mill site. This reflects the similar scale and nature of this approved store – as a discount foodstore operator – as well as its location, a short distance (c. 1.1 km) to the east along New Hey Road. The planning application for this store came forward in full knowledge of the proposals for a new Lidl store on the former Spotted Cow site. Furthermore, and as set out in Section 7.0, the Aldi site is no more sequentially preferable to the Lidl application site.

8.23 The next highest impact (13% - or 21% when considered cumulatively with the committed Aldi) would be upon the existing Sainsbury's store at Salendine Nook Local Centre - reflecting its proximity to the application site and status as the largest existing foodstore on the north-western side of Huddersfield. However, on the basis of our recent visits, this store is currently performing very strongly. Indeed, the household surveys undertaken in October 2019 as part of this assessment indicate that the store is achieving a turnover to floorpace ratio which is around 260% of the company average.

8.24 A trade diversion of this order would not therefore result in any material impact upon its overall viability, as the store would continue to trade at a level significantly above (more than twice) Sainsbury's national company average. Furthermore, as set out above, this store would continue to meet day to day and top-up food retail needs, serving a different sector to the new Lidl facility - which would cater for those undertaking weekly food shopping trips and/or choosing to shop in the discount end of the market.

8.25 The impact upon the Aldi at Milnsbridge is forecast to be around 8%, or 17% when considered alongside the committed Aldi on the Oakes Mill site. This reflects the status of this facility as the closest existing discount foodstore to both the proposed new Lidl and committed Aldi, and, therefore, the extent to which these stores would compete with one another. However, this store is also performing strongly, with a turnover based on the recent household surveys of around 275% of the Aldi company average. As with Sainsbury's at Salendine Nook, there is no prospect that a cumulative impact of this order would have any material impact upon either the store itself or the wider centre.

8.26 It is forecast that Lindley Local Centre will experience an impact of around 3% (or 6% cumulatively). This reflects the fact that this centre includes a Sainsbury's Local convenience store and, at around 1.25 km to the north-east, is one of the closest centres to the application site. However, this Sainsbury's store is small in size, at less than 200 sqm net, which is around 15% of the size of the new Lidl proposed at New Hey Road. The new store will not therefore compete directly with this existing Sainsbury's facility, which primarily meets the day to day needs of local residents in the immediate surrounding residential area.

8.27 The impacts forecast upon Birchencliffe and other existing centres/stores in the PCA are all below 2% (or below 3% when considered cumulatively, with the approved Aldi). This reflects, again, the more limited extent to which provision within these centres - which comprises smaller and primarily independent traders - will compete with the proposed new Lidl on New Hey Road.

8.28 At these levels, there is not considered to be any prospect that the proposed discount foodstore will have a significant impact upon the vitality and viability of any individual centre. This is particularly given the current health of these centres, which are all performing well at their respective levels in the local retail hierarchy, with only one vacant unit each in Lindley and New Hey Road/Acre Street, and none in Salendine Nook and Birchencliffe. Given their scale and nature, existing facilities within these centres will continue to perform an important role in meeting the top-up shopping needs of local residents, including those living in their immediate vicinity. Furthermore, existing smaller and independent traders there would continue to benefit from a number of trading advantages. These include:

- the range and quality of the produce they are able to offer within their individual sectors;
- the more personal service they are able to offer;
- loyalty from their existing customer base; and
- proximity to other shops and services within these centres, from which they are able to pick-up spin-off trade.

8.29 The above impacts reflect the absence of any existing medium or large sized foodstores on the north-western side of Huddersfield and the fact that, as a result, diversion of trade to the proposed discount foodstores would be spread across a wide range of stores in the surrounding area - including a significant proportion which would be ‘clawed-back’ from stores outwith the PCA. As set out above, such stores include existing Lidl and Aldi facilities, as well as Tesco, Asda and Sainsbury’s superstores, elsewhere in Huddersfield. Given the number of stores over which the diversion would be spread, as well as their scale and the different catchment areas they serve, which cover large parts of Huddersfield and beyond, it is unlikely to result in any material impact upon their vitality and viability.

8.30 The existing Lidl and Aldi stores at Castlegate and Beck Road are forecast to experience impacts of 6% and 3% respectively (or cumulative impacts of 10% and 9%), with that upon the Lidl store at Wakefield Road being lower, at around 2% (or 4% cumulatively). Whilst the Aldi store at Beck Road is situated just to the south of Hillhouse Local Centre, it has no visual relationship with that centre. In any event, based on the household surveys, all of these stores are achieving levels of turnover which are significantly above their respective company averages (ranging from around 60% above to 230%) and could therefore comfortably withstand cumulative impacts of the levels forecast.

8.31 Lidl are currently proposing to relocate from their existing Castlegate facility to a new store as part of the planned redevelopment of land at Trinity Street. Furthermore, their Wakefield Road store is more distant - being situated to the east (and other side) of Huddersfield Town Centre, and therefore serves a different catchment area to the either of their proposed new stores at New Hey Road and Trinity Street. Lidl have confirmed that they have no concerns over the trading performance of their Wakefield Street store and that they fully intend to proceed with their planned new facility at Trinity Street, irrespective of the outcome of the current application at New Hey Road.

8.32 The impacts upon the Co-op and Tesco Express stores in Marsh (around 2% or 4%-5% cumulatively) reflect the fact that they perform more of a top-up shopping role, meeting the day to day needs of residents who live in the immediate surrounding areas. It is not considered that the levels of impact forecast would have any significant adverse impact upon the vitality and viability of these stores, or indeed Marsh District Centre, within which the Co-op store lies.

8.33 The impacts upon the two Sainsbury's stores within/on the edge of Huddersfield Town Centre (at Southgate and Market Street), as well as Tesco at Viaduct Street (on the edge of the town centre) and Asda at Bradford Road (which is out-of-centre), are forecast to be between 1%-2% (around 3% cumulatively). However, with the exception of Tesco - which is still forecast to achieve a total convenience goods turnover of around £18m even after implementation of committed and proposed developments - these stores are currently achieving a turnover level either around or above their company respective averages.

8.34 There is no prospect that the levels of trade diversion forecast to the proposed new stores on New Hey Road would have any significant adverse impact upon the health of the wider town centre. This is particularly given the wide range of other commercial and community uses found in the centre, the vast majority of which would be unaffected by the development proposed.

Summary

8.35 The proposed new Lidl store at New Hey Road would not result in any significant adverse impact upon the vitality and viability of existing centres either within or beyond the PCA, or upon existing and future planned investment in such centres.

8.36 The proposed new Lidl store would significantly enhance the range of foodstore provision serving residents the PCA, providing more effective competition for Sainsbury's at Salendine Nook and reducing the need for residents to travel to meet their needs. Any trade diversion would be dispersed across a range of stores in the surrounding area – some of which are located outside of existing centres - including those beyond the PCA. Existing facilities within such centres, including Sainsbury's, will continue to perform an important role in meeting the day to day and top-up shopping needs of local residents.

8.37 In this context, given the levels of trade diversion forecast, and the strong performance of Sainsbury's at Salendine Nook, it is not considered that the proposed development would have any significant adverse effect upon any existing defined centres.

9.0 Policy Assessment

9.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act, this section considers the acceptability of the proposed development against the statutory development plan, as well as other material considerations.

Principle of Development

9.2 It is acknowledged that the site is allocated for residential development in the recently adopted Local Plan. However, notwithstanding this allocation, it is considered that there are a number of material considerations which outweigh the release of the site for another form of development and the very minor impact this would have on the Council's housing land supply. Some of these considerations were set out in the Planning & Retail Statement which accompanied the previous application at the site, however new evidence is now also available which supports the development of the site for an alternative non-residential use. This application is also being submitted in a very different socio-economic climate following the coronavirus outbreak, which has had a profound effect on the retail market and wider economy and how people shop for convenience goods.

Need for increased convenience retail provision

9.3 The evidence set out in Section 8.0 of this Statement illustrates the currently very high amount of convenience expenditure which is leaking out of the PCA within which the application site is located. It is estimated that less than half (around 45%) of convenience goods expenditure generated in the PCA is spent at stores within this area, with the remainder flowing to stores further afield. There is, therefore, a need to enhance the range of foodstore provision serving existing residential areas on the north-western side of Huddersfield. This need will become greater over time, as new residential population is created through planned new housing development, and existing, unsustainable, travel patterns are exacerbated.

9.4 Whilst planning permission has recently been granted for a new Aldi store on the former Oakes Mill site, just over 1 km to the east of the application site, it has been demonstrated that, even taking into account this approved development, there is scope for more than one new foodstore serving the western side of the town. This is confirmed through the capacity exercise summarised in Section 8.0.

9.5 Additionally, since the outbreak of COVID-19, food retail sales have been consistently high in the UK. Whilst this increase in sales is partly attributable to a significant rise in online sales, online retailing still represents a relatively small proportion of total sales in the convenience sector. Indeed, the coronavirus pandemic has illustrated the importance of readily accessible essential convenience goods for local communities, particularly so for members of the community who may otherwise need to rely on public transport.

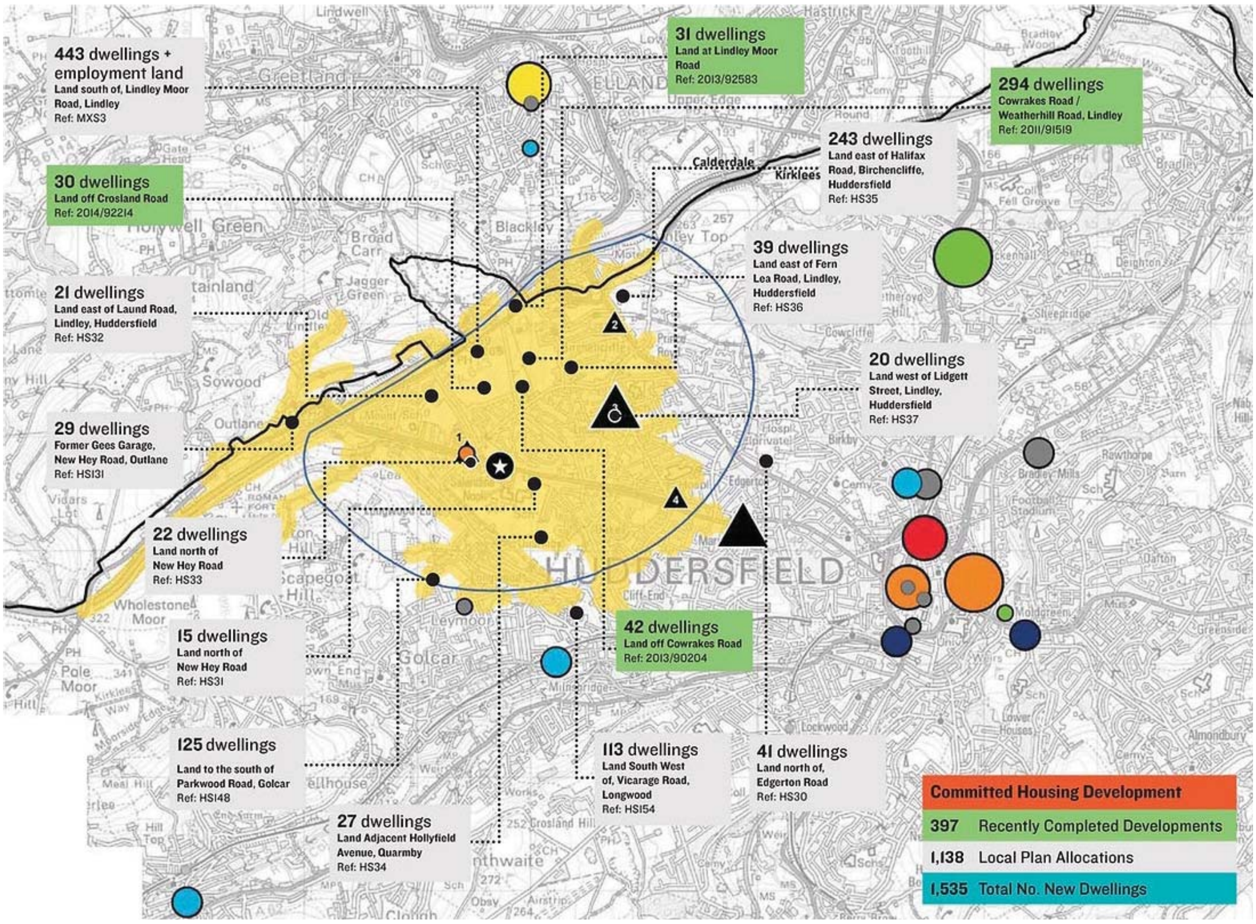
Loss of Housing Site

9.6 The site is allocated for residential development with an estimated capacity of 32 dwellings. This capacity, which is based on an undetermined (and now withdrawn) application at the site (ref: 2017/93846), equates to just 1.8% of the District's annual housing requirement, and only 0.1% of the District's overall housing requirement across the plan period.

9.7 Furthermore, the local area has seen a high level of housing delivery in recent years. In total, and excluding the proposal site, there are over new 1,500 dwellings committed within Lidl's catchment area, including approximately 400 which have been built out in recent years and

1,138 allocated in the Local Plan. This is a very significant level of planned new housing in the area – particularly given that there is no plan to improve or increase retail facilities in the area – and represents a 15% increase on the number of dwellings recorded in the 2011 census (see Figure 9.1).

Figure 9.1 Committed Housing in Lidl Catchment Area



Source: Lichfields

9.8 However, notwithstanding the potential limited contribution the site *could* make to the District's housing requirement, it is considered that the site is highly unlikely to be developed for housing at any point during the plan period, regardless of land ownership. This is due to the site constraints which resulted in the previous owner of the site withdrawing an earlier planning application for residential development at the site.

9.9 Against this background, in February 2020, Lidl commissioned Allsop LLP to undertake a Financial Viability Assessment (FVA) to investigate whether the site could be developed viably for residential development. A copy of this FVA has been submitted with this application on a confidential basis.

9.10 The FVA has used the previous residential proposal submitted at the site (application 2017/93846) to provide an indicative layout and schedule of accommodation. However, that scheme only serves as a guide, and the assessment also draws on evidence from other recently completed and under-construction schemes in the local area. The FVA therefore provides a robust assessment as to whether any developer could viably build out the site for housing given the constraints of the site, abnormal costs, local land values and residential sale values, and the Council's required planning obligations.

9.11 As explained earlier in this Statement, the site rises steeply towards the rear (northern) boundary, with a change in levels of some 10 metres from the front of the site adjacent to New Hey Road. The rising topography is underlain by solid rock. As a result of the challenging levels and ground conditions, any residential development at the site is estimated to encounter abnormal costs in the region of £1.6m in dealing with site preparation works, retaining structures and boundary treatments. Other items are expected to take total abnormal costs to over £2.5m. Considering these abnormal costs, as well as other standard costs, and a Gross Development Value based on comparable evidence, the FVA demonstrates a negative residual land value.

9.12 The FVA therefore concludes that, even if planning obligations were relaxed and eliminated, development for housing is not viable and a site value cannot be achieved that would exceed a Benchmark Land Value or indeed any positive land value. On this basis, no willing developer will be able to viably develop the site for housing and it is highly likely to remain undeveloped should the proposed retail development be refused.

Summary

9.13 There remains a pressing need for additional convenience retail provision in north west Huddersfield. The level of housing growth in the local area in recent years and that planned through the Local Plan (in addition to the application site) has exacerbated this need. The development of a Lidl foodstore at the site will help address the substantial leakage of expenditure out of the local area and will enhance foodstore provision for existing and future local residents.

9.14 If the site was developed to yield the full residential capacity estimated in the Local Plan, it would only provide 0.1% of the District's overall housing requirement across the plan period. However, evidence prepared by Allsops has demonstrated that the site is not viable for residential development and will, in reality, not make any contribution to the District's housing land supply. Therefore, even if the subject application is refused, there is very little prospect that the site will be built out as a residential development over the plan period.

9.15 It is therefore considered that it is appropriate to release the site for retail development to meet the identified local need, subject to satisfying the sequential and impact tests set out in the NPPF and addressing any other material considerations.

Town Centres and Retail

9.16 Policy PLP 13 states that Town Centres and Local Centres will remain the focus of shopping, commercial, cultural and social activity. The application site lies around 250-300m walking distance to the east of the defined Salendine Nook Local Centre. The officer's report for application 2019/91433 confirms that the site is edge-of-centre in NPPF terms, and therefore only in-centre sites would be sequentially preferable to the application proposals.

9.17 It has been demonstrated in Section 7.0 that there are no potential alternative sites or vacant units within this, or indeed other centres within the defined PCA, which could accommodate the proposed new Lidl store. Furthermore, the development would represent significant investment on an edge of centre site, which has potential to generate linked trips with facilities in the centre, and significantly enhance the existing range of foodstore provision serving the local area.

9.18 Policy PLP 13 also states that an Impact Assessment will be necessary for proposals which include retail development which are not located within a defined centre and where the proposal provides a floorspace greater than 500 sq.m gross. Section 8.0 of this Statement and the accompanying appendices set out the results of the Impact Assessment which has been undertaken in relation to this proposal. In summary, the Impact Assessment has identified more than sufficient expenditure capacity to accommodate the convenience goods turnover of the proposed Lidl and recently approved Aldi stores. It has also demonstrated that there is sufficient expenditure capacity to support both the Aldi and Lidl developments in the area, without having any significant adverse impact upon existing stores and centres within the PCA (including Sainsbury's at Salendine Nook).

9.19 It is therefore considered that the proposal complies with Policy PLP 13 and that the Sequential and Impact tests have been met.

Design

9.20 Policy PLP 24 states that proposals should promote good design by ensuring, inter alia, the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape. The third reason for refusal given on the decision notice for the previous application at the site stated that the proposal would be at odds with the prevailing character of the area and would harm visual amenity.

9.21 Although the site immediately adjoins residential development to the east and west, there are several locations within 400m of the site where larger, non-residential buildings can be found, and these are often set back from the road itself and are signposted with commercial signage. It is therefore considered that the proposal is not at odds with the prevailing character of the area. This is illustrated in the Urban Grain plan at Figure 9.1.

Figure 2 Urban Grain Plan

Source: HTC Architects

9.22 The proposal now includes a full natural stone elevation facing New Hey Road and a revised boundary wall with iron railing infill panels, as well as a paved entrance feature adjacent to the site entrance.

9.23 The revised proposal is considered to fully accord with the provisions of Policy PLP 24. Further details on the proposed design and architectural rationale can be found in the accompanying Design and Access Statement.

10.0 Sustainable Development

10.1 Paragraph 212 of the NPPF states that its policies are material considerations which should be taken into account in the determination of planning applications. At the heart of the NPPF is a presumption in favour of sustainable development, and paragraph 8 explains that there are three dimensions to sustainability:

- an economic objective;
- a social objective; and
- an environmental objective.

10.2 This section considers how the application proposals will contribute to the building of a strong, responsive and competitive economy that supports vibrant and healthy communities and contributes to the protection and enhancement of the natural and built environment.

Economic Contribution

10.3 National planning policy requires LPAs to positively and proactively encourage sustainable economic growth and that significant weight should be placed on the need to support economic growth and productivity.

10.4 The proposed new foodstore will provide a source of employment for the surrounding areas. Based upon information from Lidl, it is estimated that the new foodstore would create 15 new full and 25 part time jobs.

10.5 These figures relate to gross employment, and do not take into account either any potential displacement of existing employment or any employment multiplier impacts, including any indirect or induced employment that could be supported. This includes employment which will be generated through spending in the local economy by those employed at the new store, and through the use of local firms/suppliers by the proposed foodstore.

10.6 The subject application proposals represent a sizeable investment in the local area and would also generate new employment during the construction phase, a proportion of which will be captured at the local level, as well as related spin-off jobs. The proposed development will therefore result in a boost to local employment and the local economy, and it should also be noted that this proposal forms part of a significant development programme by Lidl which will deliver hundreds of new jobs and millions of pounds of investment in Kirklees.

10.7 In addition, the NPPF advises that local authorities should promotes the vitality and viability of existing town centres. It has been demonstrated in Section 8.0 that the proposed development would not have any significant adverse impact upon existing centres. It has also been demonstrated that there are no sequentially preferable opportunities which are suitable and available to accommodate the proposed development.

10.8 In practice, the proposed development would enhance the range and choice of existing foodstore provision within the defined PCA, providing more effective competition for the existing Sainsbury's at Salendine Nook. It will also help to generate linked pedestrian trips with existing facilities in Salendine Nook Local Centre.

10.9 On a broader scale, Lidl is committed to sourcing British products wherever possible and has committed to investing over £15 billion in the British food and farming economy over the next 5 years to help create jobs, build business and enable further investment.

10.10 In the context of the above, it is clear that the proposed development would have a significant positive impact in economic terms.

Social Contribution

10.11 The NPPF seeks to support strong, vibrant and healthy communities by, amongst other things, fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.

10.12 Retail employment has become increasingly important in recent years, and this has been further highlighted by the loss of other service-sector jobs caused by the coronavirus pandemic. The positions created within the proposed new foodstore, as well as any new operators in their existing unit, would include those in management, checkouts, customer service, restocking, security and cleaners. Such opportunities can represent a good route into employment and represent a stepping stone towards other forms of employment and increasing skill levels.

10.13 In 2015, Lidl became the first British supermarket to adopt the Living Wage, as recommended by the Living Wage Foundation, directly benefitting over 50% of its workforce. Additionally, Lidl does not offer zero hours contracts, and offers long-term prospects and a progressive environment for local people to grow and develop. Lidl's work with graduates and undergraduates has seen it recognised in The Times' Top 100 Graduate Employers list.

10.14 The proposed development will bring a vacant and run-down site back into active use and will feature an attractive store design which brings together traditional and more modern materials, including sections of natural stone and glazing which provide a positive response to the setting. Soft landscaping will help create an inviting development which integrates well with the site constraints and enhances the social well-being of the local community. The site will be safe and accessible.

10.15 The accompanying Health Impact Assessment concludes that the proposal will have a positive impact on the identified receptor groups across most of the determinants of health. The positive outcomes are linked to the provision of the creation and enhancement of social networks, the accessibility of the site by public transport, improved road safety, improved soft landscaping and the generation of employment opportunities.

10.16 The proposed development would therefore make a significant positive contribution to the social dimension of sustainable development.

Environmental Contribution

10.17 As required by the NPPF, proposed new developments should contribute to, protect and enhance the natural and built environment.

10.18 The application site is considered to represent a sustainable location for the proposed development, due to its proximity to surrounding residential areas. The proposed development would provide safe and convenient access for pedestrians, cyclists and public transport users, as well as those travelling by car.

10.19 Lidl is committed to achieving low energy sustainable development through both the day-to-day running of its stores and designing sustainability initiatives within its buildings. As a group, Lidl operates a corporate environmental policy which represents a conscious effort to reduce carbon emissions through store design and operating procedures.

10.20 Key features which will be implemented in respect of the proposed new store are as follows:

- the store will be heated using a refrigeration waste heat recovery system. This form of renewable energy recovers waste heat from the food chilling equipment and is used to provide heating to the main sales area, warehouses and offices area. The use of this system will reduce carbon dioxide emissions by 26%;
- temperature levels within the store will be controlled by a Building Management System (BMS) and will vary throughout the store dependent on the use of each area;
- low energy lighting design, using highly efficient LED luminaires, will be used throughout the store;
- all lighting will be connected to the BMS. The lighting within the sales area will be controlled by timers linked to the opening times of the store which means that lighting is not left on unnecessarily. The sales area uses full lighting during trading hours and cuts back to one third lighting before and after trading hours to allow for the stocking of the store. Occupancy lighting controls will be used on non-retail areas;
- BMS and LUX sensors also power the external lighting. This means that lights are only on during dark hours and ensures that they do not remain on later than one hour after the store closes;
- water consumption is carefully monitored and there are sensors on the taps in the toilets in order to minimise usage and prevent wastage from them being left on;
- Lidl use '4 fan' chiller condenser units, which are externally mounted. These units are designed to omit very little noise and be as environmentally friendly as possible;
- Lidl undertake careful planning of store stock levels, stock availability and deliveries to the foodstore to ensure unnecessary journeys are avoided and the maximum amount of products possible are delivered per litre of fuel used. In addition, Lidl will optimise each delivery by returning all waste to the distribution depot on the lorry's return journey, and there are no separate waste collections made their stores;
- an Integrated Waste Management Policy, which complies with relevant legislation and minimises the impact of the foodstore on the environment, will be used with high packaging recoverability as a result of Lidl's efficient delivery and stocking system. Lidl will install waste handling equipment, such as a plastic/cardboard baler, into the store; and
- Lidl install manually operated 'dock levelling' plates within new stores which are used in conjunction with a sloped loading ramp. These 'dock levelling' plates replace hydraulic scissor lifts, which were previously used by Lidl, and have significantly lower energy consumption levels.

10.21 As a result of all of the above, the building is likely to achieve a high standard of energy efficiency and performs well in excess of Part L minimum requirements.

10.22 Lidl is a zero waste to landfill business, which means that it reduces, reuses and recycles as much as possible. As part of this, all of Lidl's cardboard and clear plastic wrap is recycled, and this equates to approximately 115,000 tonnes every year. Additionally, Lidl now purchases 100% of its electricity from renewable sources.

Electric Vehicle Charging

10.23 Policy PLP 24 states that proposals should promote good design by ensuring high levels of sustainability, including by providing charging points to encourage the use of electric and low emission vehicles.

10.24 The proposed development will include 1 rapid 50kW charging point which is capable of charging two cars at once and is equipped with multiple connections to suit different makes of vehicle. Typical fast chargers take 3-4 hours to charge a small electric vehicle, whereas the 50kW rapid charger proposed at the site will charge the same car from flat in 30 minutes. It should also be noted that Lidl does not charge customers for using EVC points at any of its stores and is one of the only supermarket operators to offer this service free of charge.

10.25 It is considered that the proposed rapid EVC point is the most appropriate form of charging point for the development, given the speed of charging it can provide and the average time spent by customers at Lidl stores.

Summary

10.26 Overall, the proposed development will make an important contribution to the economic, social and environmental well-being of the local area. Taking all relevant considerations from paragraphs 18 to 219 of the NPPF into account, it is considered that the application proposal represents sustainable development and, as such, there should be a presumption in favour of the scheme, as required by the NPPF.

11.0 Conclusions

11.1 This Planning and Retail Statement has been prepared by Lichfields on behalf of Lidl GB Ltd to accompany a full planning application for a new Lidl foodstore, along with associated access, parking, servicing and landscaping, on the site of the former Spotted Cow public house, on New Hey Road, Huddersfield. It addresses the key sequential and impact tests, as set out in the NPPF, as well as other national and local planning policy. The application follows a previous application by Lidl at the site which was refused by planning committee in December 2019. This Statement has summarised the findings of an updated retail impact assessment and a Financial Viability Assessment (FVA) which have been prepared following the refusal of the previous application.

11.2 This Statement has identified a pressing need for additional convenience retail provision within the defined PCA which encompasses the application site. Presently, less than half (around 45%) of convenience goods expenditure generated in the PCA is spent at stores within this area, with the remainder flowing to stores further afield. This lack of convenience retail provision is therefore leading to unsustainable shopping and travel patterns, and this situation will be exacerbated by the planned residential growth in the local area. The need for additional convenience retail provision is such that there is more than adequate capacity to support both this proposal and the recently approved Aldi store on New Hey Road.

11.3 The site is allocated for housing but even if it was developed to yield the full residential capacity estimated in the Local Plan, it would only provide 0.1% of the District's overall housing requirement across the plan period. Regardless of this, a review of the site's viability by Allsops has demonstrated that the site is not viable for residential development and will in reality not make any contribution to the District's housing land supply. Therefore, even if the subject application is not supported, the site is very likely to remain undeveloped for the remainder of the plan period and beyond.

11.4 In relation to the sequential test, potential alternative opportunities within and on the edge of existing defined centres within the defined PCA were considered in terms of their potential to accommodate the proposed development. It has been demonstrated that none of these sites are suitable and available to accommodate the proposed development, due to a range of issues, including their size, location, visual prominence, existing/proposed uses and other physical and heritage constraints. As such, the subject application is considered to be compliant with the sequential approach to site selection set out in Policy PLP 13 and the NPPF.

11.5 It has also been demonstrated that the proposed development would not result in any significant adverse impact, either upon investment in centres, or town centre vitality and viability. This reflects the fact that:

- The largest trade diversion impact forecast to result from the proposed Lidl (15%) would be upon the committed Aldi store on the Oakes Mill site. The planning application for this store came forward in full knowledge of the proposals for a new Lidl store on the former Spotted Cow site and there is no prospect that approval of the Lidl scheme would undermine deliver of the Aldi development.
- The next highest impact (13% - or 21% when considered cumulatively with the committed Aldi) would be upon the existing Sainsbury's store at Salendine Nook Local Centre. The household surveys undertaken in October 2019 as part of this assessment indicate that the store is achieving a turnover to floorspace ratio which is around 260% of Sainsbury's national company average.

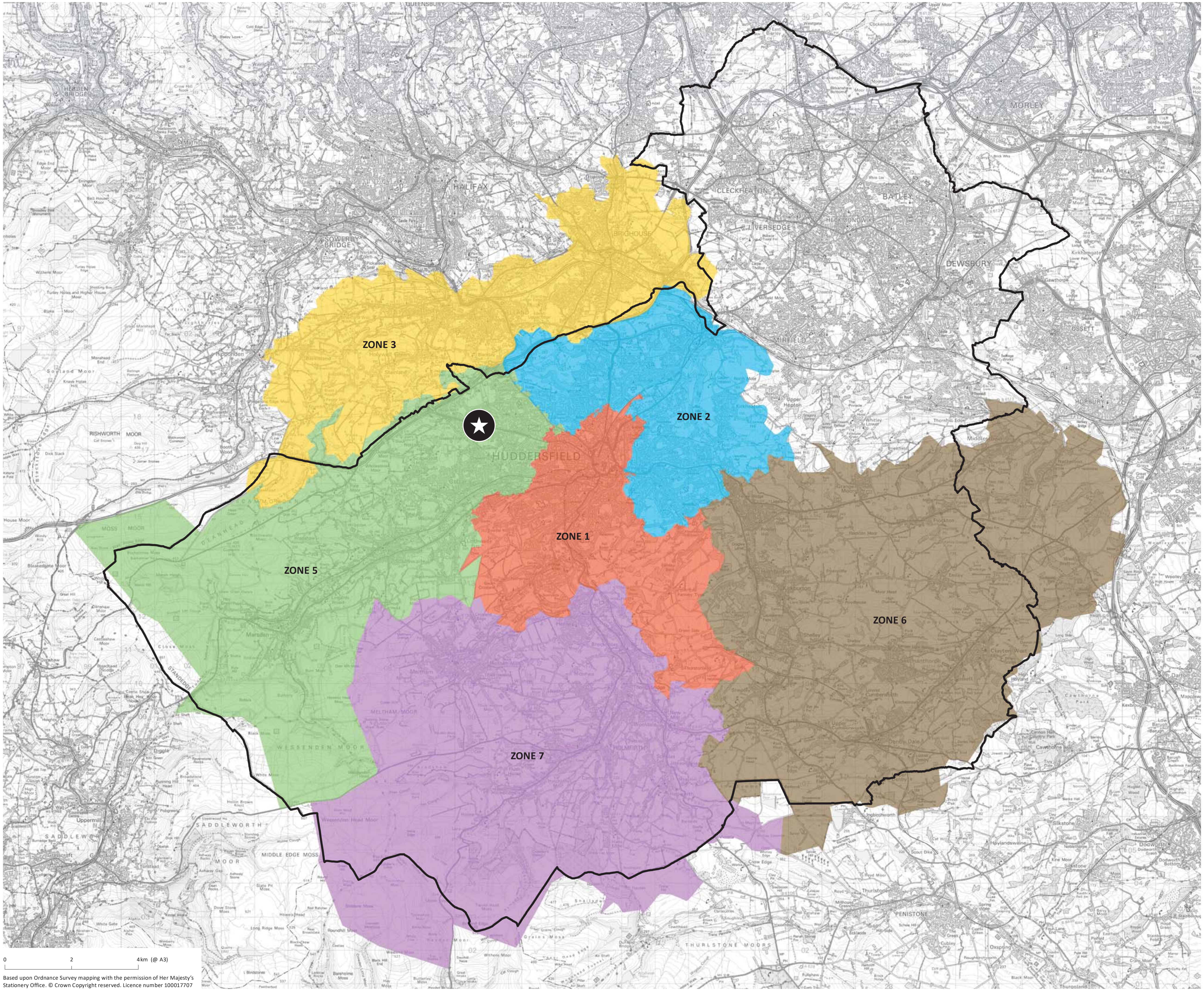
- A trade diversion from the Sainsbury's store at Salendine Nook Local Centre in the order of 21% would not have any material impact upon its overall viability, as the store would continue to trade at a level significantly above (indeed around twice the level of) Sainsbury's national company average. Furthermore, this store would continue to meet day to day and top-up food retail needs, serving a different sector to the new Lidl facility, which would cater for those undertaking weekly food shopping trips and/or choosing to shop in the discount end of the market.

11.6 In the context of the above, the proposed development is considered to satisfy the sequential and impact tests, set out in Policy PLP 13 and the NPPF.

11.7 The revised scheme now includes full natural stone elevation facing New Hey Road, and a new boundary wall design and entrance feature. The proposal also retains the protected trees to the west of the site and proposes new tree planting within the car park. It is considered that the proposal satisfies the requirements of Policy PLP 24.

11.8 The proposed development would also result in a number of other benefits, including generating new employment during both the construction and operational phases of the development, regenerating a currently vacant site in a prominent location, and the inclusion of a range of sustainability features within the new store.

Appendix 1: Primary Catchment Area Map



Key

Lidl Application Site

Kirklees Local Authority Boundary

Survey Zones:

Zone 1: Huddersfield Central

Zone 2: Huddersfield North

Zone 3: Elland and Brighouse

Zone 5: Huddersfield West (Primary Catchment Area)

Zone 6: East Kirklees

Zone 7: South Kirklees

0 1 2 3 4 5 km (@ A3)

LICHFIELDS

Project	Lidl New Hey Road
Title	Survey Zones
Client	Lidl UK GmbH
Date	01.10.2020
Scale	-
Drawn by	MAR
Drg. No	GIS\LE\50831\01-03

N

GIS Reference: S:\Jobs - LE\LE50831 - Lidl, New Hey Road\LE50831 - Lidl, New Hey Road - Survey Zones - 28.11.2019.mxd

Appendix 2: Retail Impact Tables

PROPOSED LIDL FOODSTORE, NEW HEY ROAD, HUDDERSFIELD

UPDATED CONVENENIENCE GOODS RETAIL IMPACT ASSESSMENT

Table 1: Population of Study Area

Zone	2011	2020	2025	2030	Growth 2020-2025		Growth 2020-2030	
					Persons	%	Persons	%
Zone 5 - Huddersfield West (Primary Catchment Area)	52,002	54,563	55,596	56,493	1,033	1.9%	1,930	3.5%
Zone 1 - Huddersfield Central	54,211	56,881	57,957	58,893	1,077	1.9%	2,012	3.5%
Zone 2 - Huddersfield North	59,643	62,580	63,765	64,794	1,184	1.9%	2,214	3.5%
Zone 7 - South Kirklees	35,317	37,056	37,758	38,367	701	1.9%	1,311	3.5%
Zone 6 - East Kirklees	43,040	45,160	46,014	46,757	855	1.9%	1,598	3.5%
Zone 3 - Elland and Brighouse	49,594	51,569	52,419	53,002	850	1.6%	1,433	2.8%
Total (Study Area)	**293,807**	**307,809**	**313,509**	**318,307**	**5,700**	**1.9%**	**10,498**	**3.4%**

Notes:

1. Estimate of population within each zone at 2011 sourced from Experian Software
2. Population of each zone projected forward over the period 2011-2030 using ONS 2016-based Sub-National Projections and Mid-Year Estimates

Table 2: Available Convenience Goods Expenditure Per Capita 2020-2030 (2018 prices)

	2018	2020	2025	2030	Growth 2020-2025	Growth 2020-2030
					%	%
Zone 5 - Huddersfield West (Primary Catchment Area)	2125	2101	2091	2088	-0.5%	-0.6%
Zone 1 - Huddersfield Central	1828	1807	1799	1796	-0.5%	-0.6%
Zone 2 - Huddersfield North	1970	1948	1939	1936	-0.5%	-0.6%
Zone 7 - South Kirklees	2135	2111	2101	2098	-0.5%	-0.6%
Zone 6 - East Kirklees	2053	2030	2020	2017	-0.5%	-0.6%
Zone 3 - Elland and Brighouse	2111	2087	2077	2074	-0.5%	-0.6%

Notes:

1. Base convenience goods expenditure per capita at 2018 sourced from Experian Software (in 2018 prices)
2. Deduction made to reflect Special Forms of Trading (SFT), increasing from 4.5% in 2020, to 6.4% in 2030 (Experian Briefing Note 17.0 January 2020)
3. Base expenditure projected forward on the Experian's forecast annual growth rates (Experian Briefing Note 17.0 January 2020)

Table 3 : Total Convenience Goods Expenditure Per Capita 2020 - 2030 (2018 prices)

Retail Expenditure Type	2020	2025	2030	Growth 2020-2025	Growth 2020-2030
				%	%
Zone 5 - Huddersfield West (Primary Catchment Area)	114.637	116.251	117.958	1.4%	2.9%
Zone 1 - Huddersfield Central	102.783	104.265	105.772	1.4%	2.9%
Zone 2 - Huddersfield North	121.906	123.640	125.441	1.4%	2.9%
Zone 7 - South Kirklees	78.226	79.329	80.494	1.4%	2.9%
Zone 6 - East Kirklees	91.674	92.949	94.309	1.4%	2.9%
Zone 3 - Elland and Brighouse	107.624	108.874	109.926	1.2%	2.1%
Total	**616.850**	**625.308**	**633.900**	**1.4%**	**2.8%**

Notes:

1. Total available expenditure is the product of applying population forecasts in Table 1 to expenditure per capita forecasts set out in Table 2

Table 4: Convenience Goods Market Shares and Expenditure Flows within the Study Area in 2020 (2018 prices)

Centre/Location	Floorspace (sqm)	Zone 5 - Huddersfield West (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the PCA	Total Turnover	
		(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)	(£/sqm)
Primary Catchment Area										
Lindley Large Local Centre	409	2.7%	3.095	0.0%	0.000	0.5%	3.095	0.163	3.258	7966
Salendine Nook Local Centre	660	11.2%	12.839	1.0%	4.791	2.9%	17.631	0.928	18.559	28119
Birchencliffe Local Centre	316	0.3%	0.344	0.1%	0.366	0.1%	0.710	0.037	0.747	2364
Aldi, Milnsbridge District Centre	791	11.7%	13.412	1.7%	8.472	3.5%	21.885	1.152	23.036	29123
Other Stores/Centres, PCA		19.1%	21.896	0.9%	4.398	4.3%	26.294	1.384	27.678	
Sub-Total (Primary Catchment Area)	***2,176***	***45.0%***	***51.587***	***3.6%***	***18.027***	***11.3%***	***69.614***	***3.664***	***73.278***	
Aldi, The Ringway Centre	750	2.5%	2.866	2.7%	13.352	2.6%	16.218	1.802	18.020	24027
Lidl, Castlegate	552	2.0%	2.293	1.4%	6.802	1.5%	9.095	1.011	10.105	18307
Lidl, Wakefield Road	846	0.2%	0.229	2.6%	12.920	2.1%	13.149	1.461	14.610	17270
Tesco, Viaduct Street	2,084	2.8%	3.210	2.6%	13.046	2.6%	16.255	1.806	18.062	8667
Sainsbury's, Southgate	4,572	10.3%	11.808	6.4%	32.007	7.1%	43.814	4.868	48.682	10648
Sainsbury's, Market Street	2,257	4.9%	5.617	5.1%	25.759	5.1%	31.376	3.486	34.862	15446
Asda, Bradford Road	2,687	8.2%	9.400	7.3%	36.692	7.5%	46.092	5.121	51.213	19060
Co-op, Marsh	818	1.7%	1.949	0.7%	3.495	0.9%	5.443	0.605	6.048	7394
Tesco Express, New Hey Road	128	1.3%	1.490	0.2%	1.233	0.4%	2.724	0.303	3.026	23736
Other Stores (Zones 1-3 & 6-7)		19.4%	22.240	51.7%	259.750	45.7%	281.989			
Sub-Total (Zones 1-3 & 6-7)		***53.3%***	***61.101***	***80.7%***	***405.055***	***75.6%***	***466.156***			
Other Stores (Beyond the Study Area)		***1.7%***	***1.949***	***15.8%***	***79.132***	**13.1%**	***81.081***			
Total		**100.0%**	**114.637**	**100.0%**	**502.214**	**100.0%**	**616.850**			

Notes

1. Expenditure flows based on NEMS household shopping surveys undertaken in October 2019
2. Total convenience goods expenditure within the Study Area at 2020 sourced from Table 3
3. Net convenience goods floorspace based on Lichfields site visits in September 2020, ORC Storepoint database (2020) and WYG Kirklees Retail Capacity Study

Table 5: Convenience Goods Market Shares and Expenditure Flows within the Study Area in 2024 (2017 prices)

Centre/Location	Floorspace (sqm)	Zone 5 - Huddersfield West (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the PCA	Total Turnover	
		(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)	(£/sqm)
Primary Catchment Area										
Lindley Large Local Centre	409	2.7%	3.139	0.0%	0.000	0.5%	3.139	0.165	3.304	8078
Salendine Nook Local Centre	660	11.2%	13.020	1.0%	4.857	2.9%	17.877	0.941	18.817	28511
Birchencliffe Local Centre	316	0.3%	0.349	0.1%	0.371	0.1%	0.719	0.038	0.757	2397
Aldi, Milnsbridge District Centre	791	11.7%	13.601	1.7%	8.588	3.5%	22.189	1.168	23.357	29528
Other Stores/Centres, PCA		19.1%	22.204	0.9%	4.458	4.3%	26.662	1.403	28.065	
Sub-Total (Primary Catchment Area)	***2,176***	***45.0%***	***52.313***	***3.6%***	***18.273***	***11.3%***	***70.586***	***3.715***	***74.301***	
Aldi, The Ringway Centre	750	2.5%	2.906	2.7%	13.534	2.6%	16.441	1.827	18.267	24357
Lidl, Castlegate	552	2.0%	2.325	1.4%	6.895	1.5%	9.220	1.024	10.244	18558
Lidl, Wakefield Road	846	0.2%	0.233	2.6%	13.096	2.1%	13.329	1.481	14.809	17505
Tesco, Viaduct Street	2,084	2.8%	3.255	2.6%	13.223	2.6%	16.478	1.831	18.309	8786
Sainsbury's, Southgate	4,572	10.3%	11.974	6.4%	32.443	7.1%	44.417	4.935	49.352	10794
Sainsbury's, Market Street	2,257	4.9%	5.696	5.1%	26.109	5.1%	31.806	3.534	35.340	15658
Asda, Bradford Road	2,687	8.2%	9.533	7.3%	37.192	7.5%	46.724	5.192	51.916	19321
Co-op, Marsh	818	1.7%	1.976	0.7%	3.542	0.9%	5.519	0.290	5.809	7101
Tesco Express, New Hey Road	128	1.3%	1.511	0.2%	1.250	0.4%	2.761	0.145	2.907	22798
Other Stores (Zones 1-3 & 6-7)		19.4%	22.553	51.7%	263.289	45.7%	285.842			
Sub-Total (Zones 1-3 & 6-7)		***53.3%***	***61.962***	***80.7%***	***410.574***	***75.6%***	***472.536***			
Other Stores (Beyond the Study Area)		***1.7%***	***1.976***	***15.8%***	***80.210***	***13.1%***	***82.186***			
Total		**100.0%**	**116.251**	**100.0%**	**509.057**	**100.0%**	**625.308**			

Notes

1. Expenditure flows based on NEMS household shopping surveys undertaken in October 2019
2. Total convenience goods expenditure within the Study Area at 2025 sourced from Table 3
3. Net convenience goods floorspace based on Lichfields site visits in September 2020, ORC Storepoint database (2020) and WYG Kirklees Retail Capacity Study

Table 6 (a): Forecast Turnover of the Proposed Aldi Foodstore in 2025 (2018 prices)

Gross Floorspace (sqm)	1,785
Net Floorspace (all goods) (sqm)	1,315
Net Floorspace (convenience goods) (sqm)	1,118
Turnover to Floorspace ratio	10,542
Total Turnover £m	**11.786**

Table 6 (b): Forecast Trade Draw of the Proposed Aldi Foodstore in 2025 (2018 prices)

	Trade Drawn (%)	Trade drawn (£m)	Penetration Rate (%)
Zone 5 (Primary Catchment Area)	50.0%	5.893	5.1%
Other Zones	45.0%	5.304	1.0%
Beyond the Study Area	5.0%	0.589	
Total	**100.0%**	**11.786**	

Notes

1. Gross and net floorspace details sourced from Aldi
2. Assumes that 80% of net area will be used for the sale of convenience goods
3. Turnover to floorspace ratios sourced from Global Data, allowing for convenience/comparison goods split and VAT
4. Proportions of trade drawn from within and beyond PCA based on scale, nature and accessibility of existing and proposed provision

Table 7: Convenience Goods Market Shares and Expenditure Flows within the Study Area in 2025 - with Committed Aldi Store (2018 prices)

Centre/Location	Floorspace (sqm)	Zone 5 - Huddersfield West (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the PCA	Total Turnover	
		(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)	(£/sqm)
Primary Catchment Area										
Committed Aldi Store	**1,118**	**5.1%**	**5.893**	**1.0%**	**5.304**	**1.8%**	**11.197**	**0.589**	**11.786**	**10542**
Lindley Large Local Centre	409	2.6%	3.060	0.0%	0.000	0.5%	3.060	0.164	3.224	7882
Salendine Nook Local Centre	660	9.8%	11.385	0.9%	4.646	2.6%	16.031	0.900	16.931	25653
Birchencliffe Local Centre	316	0.3%	0.342	0.1%	0.368	0.1%	0.710	0.038	0.748	2367
Aldi, Milnsbridge District Centre	791	10.2%	11.893	1.6%	8.216	3.2%	20.109	1.117	21.226	26835
Other Stores/Centres, PCA		18.9%	21.925	0.9%	4.439	4.2%	26.364	1.397	27.761	
Sub-Total (Primary Catchment Area)	***3,294***	***46.9%***	***54.497***	***4.5%***	***22.973***	***12.4%***	***77.471***	***4.205***	***81.676***	
Aldi, The Ringway Centre	750	2.2%	2.541	2.5%	12.949	2.5%	15.490	1.748	17.238	22984
Lidl, Castlegate	552	1.8%	2.106	1.3%	6.671	1.4%	8.777	0.991	9.768	17696
Lidl, Wakefield Road	846	0.2%	0.218	2.5%	12.813	2.1%	13.031	1.449	14.480	17115
Tesco, Viaduct Street	2,084	2.7%	3.153	2.6%	13.080	2.6%	16.233	1.811	18.044	8659
Sainsbury's, Southgate	4,572	9.9%	11.523	6.3%	32.022	7.0%	43.544	4.871	48.415	10590
Sainsbury's, Market Street	2,257	4.7%	5.446	5.1%	25.714	5.0%	31.160	3.481	34.640	15348
Asda, Bradford Road	2,687	7.9%	9.233	7.2%	36.789	7.4%	46.022	5.135	51.158	19039
Co-op, Marsh	818	1.6%	1.889	0.7%	3.489	0.9%	5.378	0.286	5.664	6924
Tesco Express, New Hey Road	128	1.3%	1.473	0.2%	1.239	0.4%	2.713	0.144	2.857	22406
Other Stores (Zones 1-3 & 6-7)		19.2%	22.269	51.5%	262.150	45.5%	284.419			
Sub-Total (Zones 1-3 & 6-7)		***51.5%***	***59.851***	***79.9%***	***406.915***	***74.6%***	***466.767***			
Other Stores (Beyond the Study Area)		***1.6%***	***1.902***	***15.8%***	***80.210***	***13.1%***	***82.112***			
Total		**100.0%**	**116.251**	**100.0%**	**509.057**	**100.0%**	**625.308**			

Notes

1. Expenditure flows take into account trade diversion to existing facilities, based on the scale, nature and accessibility of both existing and proposed facilities
2. Total convenience goods expenditure within the Study Area at 2025 sourced from Table 3
3. Net convenience goods floorspace based on Lichfields site visits in September 2020,
ORC Storepoint database (2020) and WYG Kirklees Retail Capacity Study

Table 8 (a): Forecast Turnover of the Proposed Lidl Foodstore in 2025 (2018 prices)

Gross Floorspace (sqm)	2,061
Net Floorspace (all goods) (sqm)	1,377
Net Floorspace (convenience goods) (sqm)	1,102
Turnover to Floorspace ratio	10,542
Total Turnover £m	**11.613**

Table 8 (b): Forecast Trade Draw of the Proposed Lidl Foodstore in 2025 (2018 prices)

	Trade Drawn (%)	Trade drawn (£m)	Penetration Rate (%)
Zone 5 (Primary Catchment Area)	70.0%	8.129	7.0%
Other Zones	25.0%	2.903	0.6%
Beyond the Study Area	5.0%	0.581	
Total	**100.0%**	**11.613**	

Notes

1. Gross and net floorspace details sourced from Lidl
2. Assumes that 80% of net area will be used for the sale of convenience goods
3. Turnover to floorspace ratios sourced from Global Data, allowing for convenience/comparison goods split and VAT
4. Proportions of trade drawn from within and beyond PCA based on scale, nature and accessibility of existing and proposed provision

Table 9: Convenience Goods Market Shares and Expenditure Flows within the Study Area in 2025 - with Committed Aldi and Proposed Lidl Stores (2018 prices)

Centre/Location	Floorspace (sqm)	Zone 5 - Huddersfield West (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the PCA	Total Turnover	
		(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)	(£/sqm)
Primary Catchment Area										
Proposed Lidl Store	**1,102**	**7.0%**	**8.129**	**0.6%**	**2.903**	**1.8%**	**11.032**	**0.581**	**11.613**	**10542**
Committed Aldi Store	**1,118**	**3.8%**	**4.369**	**1.0%**	**5.117**	**1.5%**	**9.486**	**0.551**	**10.038**	**8978**
Lindley Large Local Centre	409	2.5%	2.954	0.0%	0.000	0.5%	2.954	0.162	3.117	7620
Salendine Nook Local Centre	660	8.1%	9.422	0.9%	4.537	2.2%	13.959	0.861	14.821	22456
Birchencliffe Local Centre	316	0.3%	0.333	0.1%	0.367	0.1%	0.700	0.037	0.738	2335
Aldi, Milnsbridge District Centre	791	8.9%	10.355	1.6%	8.071	2.9%	18.427	1.081	19.508	24662
Other Stores/Centres, PCA		18.5%	21.547	0.9%	4.428	4.2%	25.975	1.391	27.367	
Sub-Total (Primary Catchment Area)	***4,396***	***49.1%***	***57.111***	***5.0%***	***25.424***	***13.2%***	***82.535***	***4.666***	***87.201***	
Aldi, The Ringway Centre	750	1.9%	2.235	2.5%	12.736	2.4%	14.971	1.695	16.666	22221
Lidl, Castlegate	552	1.5%	1.743	1.3%	6.515	1.3%	8.257	0.949	9.206	16678
Lidl, Wakefield Road	846	0.2%	0.190	2.5%	12.587	2.0%	12.777	1.402	14.179	16760
Tesco, Viaduct Street	2,084	2.6%	3.044	2.6%	13.019	2.6%	16.063	1.796	17.859	8569
Sainsbury's, Southgate	4,572	9.5%	11.026	6.3%	31.834	6.9%	42.860	4.819	47.679	10428
Sainsbury's, Market Street	2,257	4.4%	5.164	5.0%	25.533	4.9%	30.697	3.436	34.133	15123
Asda, Bradford Road	2,687	7.6%	8.835	7.2%	36.573	7.3%	45.409	5.080	50.489	18790
Co-op, Marsh	818	1.5%	1.792	0.7%	3.464	0.8%	5.256	0.282	5.538	6770
Tesco Express, New Hey Road	128	1.2%	1.422	0.2%	1.234	0.4%	2.656	0.143	2.799	21952
Other Stores (Zones 1-3 & 6-7)		18.8%	21.885	51.4%	261.534	45.3%	283.420			
Sub-Total (Zones 1-3 & 6-7)		**49.3%**	**57.337**	**79.6%**	**405.029**	**73.9%**	**462.365**			
Other Stores (Beyond the Study Area)		**1.6%**	**1.803**	**15.6%**	**79.645**	**13.0%**	**81.449**			
Total		**100.0%**	**116.251**	**100.0%**	**509.057**	**100.0%**	**625.308**			

Notes

1. Expenditure flows take into account trade diversion to existing facilities, based on the scale, nature and accessibility of both existing and proposed faci
2. Total convenience goods expenditure within the Study Area at 2025 sourced from Table 3
3. Net convenience goods floorspace based on Lichfields site visits in September 2020,

ORC Storepoint database (2020) and WYG Kirklees Retail Capacity Study

Table 10: Convenience Goods Market Shares and Expenditure Flows within the Study Area in 2029 - with Committed Aldi and Proposed Lidl Stores (2018 prices)

Centre/Location	Floorspace (sqm)	Zone 5 - Huddersfield West (Primary Catchment Area)		Sub-Total (Other Zones)		Total (Study Area)		Beyond the PCA	Total Turnover	
		(%)	(£m)	(%)	(£m)	(%)	(£m)	(£m)	(£m)	(£/sqm)
Primary Catchment Area										
Proposed Lidl Store	**1,102**	**7.0%**	**8.249**	**0.6%**	**2.943**	**1.8%**	**11.191**	**0.589**	**11.780**	**10694**
Committed Aldi Store	**1,118**	**3.8%**	**4.433**	**1.0%**	**5.186**	**1.5%**	**9.620**	**0.559**	**10.179**	**9104**
Lindley Large Local Centre	409	2.5%	2.998	0.0%	0.000	0.5%	2.998	0.165	3.163	7732
Salendine Nook Local Centre	660	8.1%	9.561	0.9%	4.599	2.2%	14.159	0.874	15.033	22777
Birchencliffe Local Centre	316	0.3%	0.338	0.1%	0.372	0.1%	0.710	0.038	0.748	2367
Aldi, Milnsbridge District Centre	791	8.9%	10.507	1.6%	8.181	2.9%	18.688	1.097	19.785	25012
Other Stores/Centres, PCA		18.5%	21.863	0.9%	4.488	4.2%	26.352	1.411	27.763	
Sub-Total (Primary Catchment Area)	***3,294***	***49.1%***	***57.949***	***5.0%***	***25.768***	***13.2%***	***83.718***	***4.732***	***88.450***	
Aldi, The Ringway Centre	750	1.9%	2.267	2.5%	12.908	2.4%	15.176	1.718	16.894	22525
Lidl, Castlegate	552	1.5%	1.769	1.3%	6.603	1.3%	8.371	0.962	9.333	16907
Lidl, Wakefield Road	846	0.2%	0.193	2.5%	12.757	2.0%	12.950	1.421	14.371	16987
Tesco, Viaduct Street	2,084	2.6%	3.089	2.6%	13.195	2.6%	16.284	1.820	18.104	8687
Sainsbury's, Southgate	4,572	9.5%	11.188	6.3%	32.264	6.9%	43.452	4.885	48.338	10573
Sainsbury's, Market Street	2,257	4.4%	5.240	5.0%	25.878	4.9%	31.118	3.483	34.601	15331
Asda, Bradford Road	2,687	7.6%	8.965	7.2%	37.068	7.3%	46.033	5.150	51.183	19048
Co-op, Marsh	818	1.5%	1.818	0.7%	3.511	0.8%	5.329	0.286	5.615	6865
Tesco Express, New Hey Road	128	1.2%	1.443	0.2%	1.250	0.4%	2.694	0.145	2.839	22263
Other Stores (Zones 1-3 & 6-7)		18.8%	22.207	51.4%	265.072	45.3%	287.279			
Sub-Total (Zones 1-3 & 6-7)		**49.3%**	**58.179**	**79.6%**	**410.507**	**73.9%**	**468.686**			
Other Stores (Beyond the Study Area)		**1.6%**	**1.830**	**15.6%**	**80.723**	**100.0%**	**82.553**			
Total		**100.0%**	**117.958**	**100.0%**	**515.943**	**100.0%**	**633.900**			

Notes

1. Expenditure flows take into account trade diversion to existing facilities, based on the scale, nature and accessibility of both existing and proposed facilities
2. Total convenience goods expenditure within the Study Area at 2030 sourced from Table 3
3. Net convenience goods floorspace based on Lichfields site visits in September 2020,

ORC Storepoint database (2020) and WYG Kirklees Retail Capacity Study

Table 11: Summary of Convenience Goods Turnovers and Trade Diversions within the Primary Catchment Area (2018 prices)

Centre/Location	Floorspace (sqm)	Turnover in 2025 - No New Development		Trade Diversion to Committed Aldi Store		Turnover in 2025 - With Committed Aldi Store		Trade Diversion to Proposed Lidl Store		Turnover in 2025 - With Proposed Lidl and Aldi Stores		Cumulative Trade Diversion		Turnover in 2030 - With Proposed Lidl and Aldi Stores	
		£m	£ per sqm	£m	%	£m	£ per sqm	£m	%	£m	£ per sqm	£m	%	£m	£ per sqm
Proposed Lidl Store	**1,102**									**11.613**	**10,542**			**11.780**	**10,694**
Committed Aldi Store	**1,118**					**11.786**	**10,542**	**1.748**	**14.8%**	**10.038**	**8,978**			**10.179**	**9,104**
Lindley Large Local Centre	409	3.304	8078	0.080	2.4%	3.224	7,882	0.107	3.3%	3.117	7,620	0.187	5.7%	3.163	7,732
Salendine Nook Local Centre	660	18.817	28511	1.886	10.0%	16.931	25,653	2.110	12.5%	14.821	22,456	3.997	21.2%	15.033	22,777
Birchencliffe Local Centre	316	0.757	2397	0.009	1.2%	0.748	2,367	0.010	1.4%	0.738	2,335	0.020	2.6%	0.748	2,367
Aldi, Milnsbridge District Centre	791	23.357	29528	2.131	9.1%	21.226	26,835	1.718	8.1%	19.508	24,662	3.849	16.5%	19.785	25,012
Other Stores/Centres, PCA		28.065		0.304	1.1%	27.761		0.394	1.4%	27.367		0.699	2.5%	27.763	
Sub-Total (Primary Catchment Area)	**4,396**	**74.301**		**4.411**		**81.676**		**6.088**		**87.201**		**8.751**		**88.450**	
Aldi, The Ringway Centre	750	18.267	24357	1.030	5.6%	17.238	22,984	0.572	3.3%	16.666	22,221	1.602	8.8%	16.894	22,525
Lidl, Castlegate	552	10.244	18558	0.476	4.6%	9.768	17,696	0.562	5.8%	9.206	16,678	1.038	10.1%	9.333	16,907
Lidl, Wakefield Road	846	14.809	17505	0.330	2.2%	14.480	17,115	0.300	2.1%	14.179	16,760	0.630	4.3%	14.371	16,987
Tesco, Viaduct Street	2,084	18.309	8786	0.265	1.4%	18.044	8,659	0.186	1.0%	17.859	8,569	0.451	2.5%	18.104	8,687
Sainsbury's, Southgate	4,572	49.352	10794	0.936	1.9%	48.415	10,590	0.737	1.5%	47.679	10,428	1.673	3.4%	48.338	10,573
Sainsbury's, Market Street	2,257	35.340	15658	0.699	2.0%	34.640	15,348	0.508	1.5%	34.133	15,123	1.207	3.4%	34.601	15,331
Asda, Bradford Road	2,687	51.916	19321	0.758	1.5%	51.158	19,039	0.669	1.3%	50.489	18,790	1.427	2.7%	51.183	19,048
Co-op, Marsh	818	5.809	7101	0.145	2.5%	5.664	6,924	0.126	2.2%	5.538	6,770	0.271	4.7%	5.615	6,865
Tesco Express, New Hey Road	128	2.907	22798	0.050	1.7%	2.857	22,406	0.058	2.0%	2.799	21,952	0.108	3.7%	2.839	22,263

Notes

1. Convenience goods turnovers in 2025 (No New Development) sourced from Table 5
2. Convenience goods turnovers in 2025 (With Committed Aldi Store) sourced from Table 7
3. Convenience goods turnovers in 2025 (With Committed Aldi and Proposed Lidl Stores) sourced from Table 9a
4. Convenience goods turnovers in 2030 (With Committed Aldi and Proposed Lidl Stores) sourced from Table 10a

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