

# Unit 2, Monks Cross Drive, Huntingdon, York, YO32 9GX.

Planning and Retail Statement for  
Lidl Great Britain Limited

November 2023  
Our Ref: 21-01439



Contents

1 INTRODUCTION .....3  
2 SITE AND SURROUNDINGS.....5  
3 CONSULTATION.....7  
4 PROPOSED DEVELOPMENT .....9  
5 THE LIDL OPERATION .....11  
6 PLANNING POLICY CONTEXT .....17  
7 SEQUENTIAL SITE ASSESSMENT .....24  
8 RETAIL IMPACT ASESSMENT.....30  
9 PLANNING ASSESSMENT .....37  
10 SUMMARY AND CONCLUSION.....42

Appendices

- Appendix 1 Location Plan
- Appendix 2 Proposed Site Layout Plan
- Appendix 3 Retail Impact Assessment Tables



## Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Planner experienced in the commercial property sector.

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# 1 INTRODUCTION

- 1.1 This Planning and Retail Statement ('PRS') has been prepared by Rapleys LLP ('Rapleys'), on behalf of Lidl Great Britain Limited ('Lidl') and is submitted in support of a planning application for the demolition of the existing building and erection of a new Lidl foodstore (Use Class E) and drive-through unit with associated car parking and landscaping at Unit 2, Monks Cross Drive, Huntington, York YO32 9GX. A Site Location plan is attached at Appendix 1.
- 1.2 This planning application is being progressed further to Planning Permission Ref. 22/01135/FULM for the "erection of foodstore following part demolition of existing unit together with drive-thru restaurant both with associated access, parking and landscaping" being granted on 18 January 2023. Planning Permission Ref. 22/01135/FULM establishes the principle of a foodstore and a drive-through unit at the site. This consent remains extant.
- 1.3 This Statement addresses the planning and retail issues affecting the site through the consideration and assessment of the proposal against key national and local planning policies and other material considerations. It also provides evidence of the unique nature of the Lidl discount operations and their complementary role to mainstream convenience retailers, by identifying relevant appeal decisions where this has been demonstrated.
- 1.4 The Statement should be read in conjunction with the following accompanying documents submitted as part of this planning application in support of the development proposals, namely:

Document	Prepared by
Application Drawings	HTC Architects
Design and Access Statement	Rapleys
Statement of Community Involvement	Royal Pilgrim
Landscape Plan	FDA Landscape
Transport Assessment	Bryan G Hall
Travel Plan	Bryan G Hall
Flood Risk Assessment	Topping Engineers
Drainage Strategy	Topping Engineers
Air Quality Assessment	Wardell Armstrong
Noise Impact Assessment	Environmental Noise Solutions Limited
Energy & Sustainability Statements	DDA
Geo-environmental Appraisal	Sirius Geotechnical
Ecological Impact Assessment	Tyler Grange
Arboricultural Impact Assessment	AWA

- 1.5 The submission documents conclude that the proposed development is acceptable and should be supported in planning terms. Therefore, planning permission should be forthcoming.
- 1.6 Against this background, the content of this Statement has been set out as follows:
1. Introduction;
  2. Site and Surroundings;
  3. Consultation
  4. Proposed Development;
  5. The Lidl Operation;
  6. Planning Policy Context;

7. Sequential Site Assessment;
8. Planning Assessment; and
9. Summary and Conclusions.

## 2 SITE AND SURROUNDINGS

### THE SITE

- 2.1 The site of the proposed foodstore, which measures approximately 1.26 ha, comprises the former TK Maxx and Argos retail units and associated parking. TK Maxx are understood to have ceased trading from the site in March 2020 and the site has been vacant since this point.
- 2.2 The site forms part of the out-of-centre retail complex at Monks Cross, in northern York. The site is bound by an office building to the north; Monks Cross Drive to the east; a Sainsbury's supermarket to the south; and the Portakabin design and build facility to the west.

### SURROUNDINGS

- 2.3 The surrounding area comprises a mix of predominantly commercial and industrial uses. To the north of the site are offices, restaurants and a hotel. Monks Cross Shopping Park is found to the east, beyond Monks Cross Drive. To the south are further commercial uses, including Vangarde Shopping Park. To the south-west is York Community Stadium, home of York City FC. To the west is a mix of industrial and commercial uses.
- 2.4 Further afield, open countryside is found to the north, east and south-east. To the south-west, beyond the built-up area is a Roman Camp. Residential uses are also found to the north-west, west and south-west of the site, with the nearest residential property being approximately 380m to the south-west.

### ACCESS

- 2.5 Vehicular access and egress to the site is currently taken from three locations. The main access is provided by a turning off Monks Cross Drive in the north-eastern corner of the site. Secondary access points are found along the southern boundary, in the form of connections to the neighbouring Sainsbury's car park.
- 2.6 When operational, it is understood that delivery vehicles utilised the main access point to the north-east of the site. A turning off this access road provides access to the storage yard to the rear of the existing unit, where deliveries took place.
- 2.7 Pedestrian access is provided alongside the main vehicular access; midway along the boundary with Monks Cross Drive; and from the Sainsbury's car park to the south.
- 2.8 Multiple bus stops within walking distance, the closest being the Sainsbury's bus stop, provide access to the site via public transport. Very good levels of cycle and pedestrian infrastructure surrounding area also provides access to the site by these means.

### SITE CONSTRAINTS

- 2.9 The site is wholly located within Flood Zone 1 (low probability of flooding from fluvial and coastal sources). There is a small area of the site, along the southern boundary with a low risk of surface water flooding.
- 2.10 There are no heritage assets on or directly adjacent to the site, however, the Roman Camp on Huntington South Moor is located roughly 400m to the south-west of the site. The site is not within or adjacent to a Conservation Area.
- 2.11 There are two trees adjacent to the site subject to Tree Preservation Orders (TPO's), namely TPO ref. CYC322-T10, located along the northern site boundary; and TPO ref. CYC322-T9, located close to the primary vehicular access point.

## PLANNING HISTORY

- 2.12 A search of York City Council's online planning portal has revealed the following planning applications, which are deemed to be of relevance to the proposed development:-

Reference	Description	Decision
18/02442/CLU	Certificate of lawfulness for use of shop units for unrestricted retail sales	Approved 11 December 2018
22/01135/FULM	Erection of food store following part demolition of existing unit together with drive-thru restaurant both with associated access, parking and landscaping	Approved 18 January 2023

- 2.13 The planning history demonstrates that the lawful use of the site is unrestricted retail (Use Class E). The site is also subject to extant consent for a foodstore and a drive-through unit.

### 3 CONSULTATION

3.1 The NPPF outlines the need of effective consultation as part of the development process in association with the preparation of planning applications. The following section outlines the consultation undertaken prior to the submission of this application.

#### PUBLIC CONSULTATION

3.2 In April 2022 Royal Pilgrim undertook a public consultation with local residents on behalf of Lidl. The responses to the consultation exercise were provided in the Statement of Community involvement which was submitted as part of application ref. 22/01135/FULM. The consultation exercises involved the delivery of 2,700 full colour leaflets to addresses close to the site, providing information about the proposed scheme and inviting residents to leave their views.

3.3 The consultation exercise received a total of 97 responses, of which 71 (73%) were in support of the proposal, suggesting that local residents are generally supportive of a new Lidl store. Respondents also raised comments on highways, the need for a new supermarket and the number of EV charging points, all of these matters were addressed through the previous application.

3.4 A further consultation exercise has been undertaken by Royal Pilgrim on behalf of Lidl in October 2023, with the distribution of 2,901 leaflets being distributed to local residents providing information about the revised proposals, and giving residents an opportunity to comment.

3.5 As with the previous consultation, residents have been able to provide their views via the following:

A free post reply slip included with the leaflet;  
Online at [monkscross.expansion.lidl.co.uk](https://monkscross.expansion.lidl.co.uk), where comments could be registered;  
Email at [lidlmonkscross@new-stores.co.uk](mailto:lidlmonkscross@new-stores.co.uk); and  
A dedicated phone number.

3.6 Further details of the proposed public consultation are provided in the Statement of Community Involvement, prepared by Royal Pilgrim, that accompanies the planning application

#### CONSULTATION WITH YORK CITY COUNCIL AND OTHER RELEVANT CONSULTEES

3.7 The latest round of consultation comments from the Council and the various statutory consultees came as part of the previous planning application (ref. 22/01135/FULM). Whilst these comments were for a slightly different scheme, it is useful to consider these comments as part of this submission given the similarities between the schemes. The key points are as follows: -

Highways – No objection, subject to conditions. Lidl were able to satisfy the local highways authority as part of the previous application. The last outstanding matter, which was addressed prior to committee was the spacing of the cycle spaces. The highways authority also requested that numerous conditions were imposed.

Ecology – No objection, subject to conditions relating to Biodiversity Net Gain; Great Crested Newts; a lighting strategy; nesting birds; and hedgehogs.

Landscape – No objection, subject to conditions. Namely the officer has suggested the following: broader spreading deciduous trees in place of those proposed; additional tree planting along the frontage; clarification that curbing will not impact on existing trees; and the submission of a Arboricultural Method Statement.

Archaeology – No objection.

Public Protection – No objection, subject to conditions regarding Construction Environmental Management Plan (CEMP); details of extraction; contaminated land details; and construction hours.



Flood Risk and Drainage – No objection, subject to agreement from Yorkshire Water. The drainage officer(s) also noted that the proposed drainage scheme presented a 30% betterment in discharge rate, which was considered acceptable.

Forward Planning – Recommended external consultation on the Sequential and Retail Impact Assessment.

Yorkshire Water – No objection, subject to conditions requiring sperate surface and foul water drainage systems; oil interceptors for surface water run-off; measures to protect water supply during construction; and no piped discharge of surface water.

Foss Internal Drainage Board – No objection, subject to agreement from Yorkshire Water.

Huntington Parish Council – No objection.

3.8 Based on the input from the various consultees, the Case Officer recommended approval, subject to the implementation of the proposed conditions. At the Planning Committee, held on 12 January 2023, Members approved the application in accordance with officer recommendations.

4 PROPOSED DEVELOPMENT

4.1 This application seeks planning permission for the demolition of the existing building and erection of a new Lidl foodstore (Use Class E) and drive-through unit with associated car parking and landscaping at Unit 2, Monks Cross Drive, York. A summary of the proposed development is provided below.

SHARED ACCESS ROAD

4.2 Both the drive-through unit and foodstore unit will primarily be served via the existing access road off Monks Cross Drive, in the north-eastern corner of the site. From this location, two left hand turning points (one close to the access and the other at the western end of the access road) will provide access to the Lidl car park.

4.3 Meanwhile, the drive-through will be served by a one-way drive-through lane. The drive-through lane will be accessed from the western end of the access road and stretches around the northern elevation of the drive-through unit, before exiting roughly midway along the access road.

4.4 Both units can also be accessed from the Sainsbury's car park to the south, via the link roads between the car parks.

4.5 Pedestrian access will be provided alongside the main vehicular access. A marked crossing, spanning the access road, will also allow pedestrians to move between the foodstore and the drive-through unit.

FOODSTORE

4.6 The proposed single-storey foodstore element is located in the south-western corner of the site; and is orientated roughly east-westwards. For ease of comparison between the extant consent and the proposed foodstore, the floorspace figures for each are set out below: -

	Approved floorspace	Proposed floorspace	Difference
Sales Area	1,456 sqm	1,512 sqm	+56 sqm
Warehouse	443 sqm	447 sqm	+4 sqm
Ancillary	270 sqm	213 sqm	-57 sqm
Gross Internal Area (GIA)	2,169 sqm	2,172 sqm	+3 sqm

4.7 As demonstrated above, the proposed foodstore would provide a negligible uplift in GIA compared with the previously consented scheme. The Sales Area of the proposed foodstore would be 56 sqm larger than that approved through the extant consent, which is considered to represent a very modest uplift.

4.8 The Lidl element of the proposal will comprise a total of 124 car parking spaces, comprising:

- 107 'standard' parking spaces;
- six accessible parking bays;
- nine parent & child spaces; and
- two 'rapid' electric vehicle ('EV') bays.

4.9 The accessible parking bays for the Lidl store will be located along the eastern elevation of the proposed foodstore, close to the store entrance and trolley bay. Meanwhile, the parent & child spaces will be situated along the northern elevation, again close to the store entrance and trolley bay. The location of these spaces promotes safe and convenient access for those with additional access requirements.

- 4.10 Parking facilities will also be provided for cyclists, in the form of 6no. Sheffield style bike stands beneath the canopy along the eastern elevation, offering secure parking for 12 cycles. Lidl employees are permitted to store their bikes in a suitable and secure location within the warehouse.
- 4.11 A shopping trolley bay for the Lidl store will be provided under the canopy close to the store entrance on the northern elevation of the store, to allow easy access to shopping trolleys for all customers.
- 4.12 A dedicated delivery bay will be delivered along the western elevation of the foodstore. This will enable foodstore deliveries on the site to be made safely and efficiently, with minimal disruption to customers. The delivery vehicles will drive onto the site in forward gear and line up with the delivery bay, before reversing into the bay, dropping off goods directly into the warehouse area and driving off the site again in forward gear.
- 4.13 Pedestrian Access to the Lidl store will be provided alongside the main vehicular access; and via a dedicated access roughly halfway along the boundary with Monks Cross Drive. Marked crossings safely and conveniently convey pedestrians across the car park.
- 4.14 The proposed Lidl development will also be supported by landscaping scheme which will ensure that the site is visually appealing and reduce the visual impact of the store.

#### DRIVE-THROUGH UNIT

- 4.15 The proposed drive-through unit, which will be located in the north-east of the site, is slightly larger than that previously approved through the extant planning permission. The GIA will increase from 168 sqm to 242 sqm.
- 4.16 A compound area and loading bay will be provided close to the south-western corner of drive-through unit, enabling servicing to take place safely and efficiently. The proposed drive-through unit will also deliver an external seating area to the south-east of the unit, close to the restaurant entrance.
- 4.17 Demarcated parking, specifically for use by drive-through patrons will be provided along the southern side of the shared access road. A total of 13 no. spaces will be provided, including three accessible parking spaces. In addition, waiting bays will be provided to the east of the drive-through lane exit, allowing customers to wait for their order to be finalised, without blocking the drive-through traffic.
- 4.18 The Design and Access Statement that accompanies this Planning and Retail Statement details the aesthetic appearance of the proposed development. In addition, full details of the proposed development are presented on the drawings accompanying the submission, including the Proposed Site Layout Plan, which can be found at Appendix 2.

## 5 THE LIDL OPERATION

5.1 Full details of the proposed development are presented in the plans accompanying the submission and addressed in detail below.

5.1 This section provides an overview of the Lidl retail operation, including the position of the company within the UK retail market and its key trading characteristics.

### POSITION WITHIN THE MARKET

5.2 Lidl and Schwarz Grocery Wholesale was founded in Germany in the 1930s, since then the company has diversified into supermarkets under the trading name 'Kaufland' and discount foodstores known as 'Lidl'. Today the Schwarz Group is one of the largest grocery retailers in Europe.

5.3 The first Lidl stores opened in Germany in 1973 and by the 1980s Lidl had become a household name. In the early 1990s Lidl began to expand throughout Europe, and more recently into the US and Asia. Lidl now has around 12,000 stores and more than 200 goods distribution centres spread across 31 countries. Lidl commenced trading in the UK in November 1994 and since that date has grown become a substantial presence in the convenience retail market, with over 960 stores currently trading nationwide. [The Kantar Worldpanel Grocery Market Share](#) data found that on 3 September 2023 Lidl was the sixth largest convenience retailer in Great Britain, with 7.6% of the market share.

### DISCOUNT FORMAT

5.4 The Lidl retail philosophy is centred on simplicity and maximum efficiency at every stage of business, from supplier to customer, enabling the company to sell high-quality own brand products at the lowest prices. It is this format that has resulted in Lidl being classified by retail research company Verdict as a 'deep' or 'hard' discounter.

5.5 The "deep discount" sector includes Lidl and Aldi. This sector also included Netto, which returned to the UK market in 2014. However, in July 2016, the company announced that they would withdraw from the UK market by August 2016. 'Deep discounters' concentrate on selling a limited range of primarily own brand goods at extremely competitive prices. These retailers are therefore distinct from mainstream convenience retailers such as Tesco, Asda, Sainsbury's and Morrisons in the offer that they provide to shoppers.

5.6 Lidl is able to offer high-quality products at low prices due to extensive Pan-European bulk purchasing. This enables the company to achieve significant economies of scale that can then be passed on to the customer in the form of highly competitive prices. Other factors that enable Lidl to offer consistently low prices include the format of its stores and the approach taken to the display and sale of products.

5.7 The fact that Lidl provides a distinct offer to the main convenience retailers was recognised by the Competition Commission in its 2008 'Grocery Market Investigation'. The Glossary to the investigation report refers to Lidl as 'Limited Assortment Discounter' or 'LAD', which is defined as:

*"Limited Assortment Discounters (i.e. grocery retailers offering noticeably lower prices than conventional supermarket but which stock a limited range of products)."*

5.8 Further reference is made to LAD stores at paragraph 3.3, page 30 of the investigation:

*"Limited Assortment Discounters (LADs) carry a limited range of grocery products and base their retail offer on selling these products at very competitive prices. The three major LADs in the UK are Aldi, Lidl and Netto. Each of Aldi, Lidl and Netto carries in the region of 1,000 to 1,500 product lines in stores ranging from 500 to 1,500 sqm (Stores of a similar size operated by a large grocery retailer generally carry around 10,000 - 15,000 products.)"*

5.9 Paragraph 4.80, page 70 of the investigation goes on to state that due to the limited number of products carried by LADs they are not close substitutes for other foodstores of a comparable size (i.e. they are different):

*“The limited number of products carried by LADs stores means that these stores are not close substitutes for similarly-sized stores operated by CGL (Co-op), M&S, Sainsbury’s, Somerfield and Tesco. In particular, we note that Aldi, Lidl and Netto stores typically sell fewer than 1,000 products. In comparison, large grocery retailers generally sell around 5,000 to 10,000 products in stores in the same size range as those operated by LADs (i.e. 500 to 1,400 sqm). The results of our entry analysis also show that Aldi, Lidl and Netto stores are not close substitutes for the stores of large grocery retailers”.*

5.10 The findings of the Competition Commission’s 2008 investigation therefore confirmed that Lidl does provide a different offer to the main food retailers.

5.11 This difference has also been acknowledged by the Secretary of State and Planning Inspectors in a number of appeal decisions relating to Lidl stores. In relation to a Secretary of State decision in the London Borough of Merton (APP/T5720/V/04/1171394), the Planning Inspector in his report concluded that:

*“283. The Lidl offer is materially different to that provided by the mainstream food retailers”.*

5.12 Further to this, it was recognised by an inspector when approving a new store in New Addington Croydon (APP/L5240/A/07/2052053) that:

*“17. The Lidl offer is materially different to that provided by the main food retailers and as a result ...would meet a qualitative need by extending consumer choice. Furthermore, it would add a new dimension to competition within the area”.*

5.13 The different offer provided by discount foodstores to the likes of Tesco and Sainsbury’s is now widely recognised and accepted.

#### LIMITED PRODUCT RANGE

5.14 Aside from the difference in pricing from the main convenience retailers, another characteristic of the Lidl business model, as already highlighted in the Competition Commission’s findings above, is that Lidl carry a comparatively limited range of primarily own brand products.

5.15 The majority of Lidl product lines consist of basic convenience goods sourced from Europe, with a few recognised brands sold, in addition to a limited range of fresh fruit and vegetables and also pre-packed meats and frozen food stuffs. Lidl aims to keep the shopping experience simple for its customers and operates a ‘no frills’ policy by avoiding unnecessary packaging and presentation, including a basic store fit-out, all of which contributes to keeping the cost of products low.

5.16 Non-food items are limited to around 15-20% of floorspace in store. The non-food offer is mainly focused on household cleaning and health and beauty products. Lidl stores do receive a twice weekly delivery of non-food ‘specials’, which can range from garden equipment and small items of furniture to flat screen TVs. These are also sourced on a Pan-European scale at competitive prices. These items are provided on a ‘when it’s gone, it’s gone’ basis and owing to the limited and constantly changing offer, the potential for impact upon other retailers is negligible.

## NOT THE FULL RETAIL OFFER

5.17 Lidl stores also differ from other convenience retailers by not offering any of the following products or services:

- Fresh meat and fish counter;
- Café/restaurant;
- Delicatessen/cheese counter;
- Hot food counter;
- Home Delivery;
- Pharmacy;
- Dry-cleaning service;
- Post Office services;
- Photographic shop; and
- Mobile phone shop.

5.18 Lidl does not offer any of the above products/services because these do not fit with the company's retail concept and business model. Lidl has a successful, proven format that works, and there is no intention to change it. The introduction of any of the above could have an adverse impact on the prices offered to customers.

5.19 As a consequence of the Lidl business model, its customers tend to purchase part of their main grocery shop (i.e., basic staples) in store, taking advantage of the low prices, but then visit other retailers to purchase luxury food or more specialist items. This, combined with the fact that Lidl does not offer the products and services listed above that are found in many of the main convenience retailers as well as smaller local independents, means that its stores complement existing retail provision, while providing additional opportunity and choice for shoppers.

## SHORTER TRADING HOURS

5.20 The standard opening hours for Lidl stores are also more limited than the main convenience retailers, as well as smaller independent convenience retailers. Generally, Lidl stores open for a core period of between 07.00–23.00 Monday to Saturday (inclusive of Bank Holidays) and 10.00 –18.00 on Sundays.

5.21 The standard opening hours of Lidl stores are therefore much more limited than other retailers, which is another factor underlining that Lidl do not compete to any significant degree with other retailers, in particular, smaller convenience retailers, many of whom offer different products and services and stay open for much longer periods.

## STORE FORMAT

5.22 Lidl has an established store format that is integral to the success of its business model. The minimum store size that is required by Lidl for its operational requirements is circa 2,200 sqm gross external area (GEA). This equates to a net sales area of approximately 1,400 sqm Gross Internal Area. Typically, Lidl require all elements of their foodstores to be set out over a single level (unless there are unusual or exceptional circumstances). There are a number of reasons why this size of store is required.

5.23 A single level store of c.2,200 sqm Gross External Area allows for pallets to be easily moved directly from the delivery bay and placed in the sales area. This cannot be achieved in the same way in smaller stores, resulting in the need to break pallets down and stack more products on shelves, which consequently increases staff costs. This therefore makes it more difficult for Lidl to pass cost savings on to its customers, thereby impacting on its ability to deliver the benefits of discount retailing.

5.24 In addition, the standard store format has been purposefully designed in order to provide mobility impaired customers, the elderly and those with small children, space to move through the store easily. Lidl also place bulky goods on the sales floor to ensure that easy access to these items is maintained for all customers.

- 5.25 It has been recognised by the Secretary of State and Planning Inspectors that a single level retail operation is an essential part of the Lidl business model and that consequently ‘disaggregation (breaking stores down into convenience and comparison elements) cannot be achieved without the benefits of the discount format being lost. In this respect, in relation to a Lidl scheme in O (APP/G3110/A/04/1171310L05/1195688) the Inspector noted (paragraph 82) that:

*“The fact that Lidl only sell a limited range of goods means there is no realistic scope for disaggregation. Lidl stores cannot be broken down into constituent parts...”*

- 5.26 Major deviations from the set store format will incur significant additional costs, both in terms of initial build cost and operation maintenance. This can severely impact on the feasibility of a Lidl scheme; and prevent a store from being financially viable whilst providing customers with the discounted offer they expect. As such, significant deviation from the store model is only considered acceptable in very special circumstances.

#### LOCAL CATCHMENT

- 5.27 Lidl stores serve a relatively compact catchment area and are intended to provide a local shopping facility. The locational strategy of Lidl is for stores in urban areas, to serve an area that broadly equates to a 0-5-minute drive-time of the site. Owing to its limited offer, people do not tend to travel long distances to shop at Lidl. The catchment has regard to the nature of the settlement and surrounding area, the location of existing food retail provision within the catchment and consumer travel patterns.

- 5.28 As stated above, many customers use Lidl stores to purchase part of their main grocery shop (i.e. basic staples), often on foot, taking advantage of the low prices, but then visit other retailers to purchase luxury food or more specialist items that are not offered at Lidl (e.g. fresh fish). In addition, many Lidl customers also continue to visit smaller independent convenience stores close to their homes for top-up/basket shopping (i.e., buying a pint of milk or a loaf of bread) as well as to use services that are not provided by Lidl (e.g. dry cleaning, Post Office etc).

#### EMPLOYMENT OPPORTUNITIES

- 5.29 The proposed Lidl store would employ up to 40 staff in store. Lidl has a policy of employing local people from all backgrounds to work in their stores. This allows for a short commute to work and for staff to potentially work at short notice. The company is an equal opportunities employer with a strong social inclusion policy. The following extract is taken from Lidl’s employee handbook, which sets out the company’s equal opportunities stance:

*“Lidl is an equal opportunities employer. We wish to ensure that employees are treated, trained and promoted, and job applicants are selected on the basis of their respective skills, talents, performance and experience, without reference to their sex, marital status, race, colour, nationality, ethnic origin or disability. Whilst the company strives to realise these principles, it has a responsibility to ensure that they are applied in practice. We will not tolerate any form of harassment and we will seek to ensure that your working environment is free from prejudice. Harassment at work is unlawful.”*

- 5.30 Lidl are committed to investing in their staff and consistently offer one of the highest levels of pay in the UK supermarket sector. As of 24 May 2023, pay rises for store and warehouse staff saw entry-level hourly rates rise to £11.40 (£12.85 within the M25), which is substantially higher than the National Living Wage and National Minimum Wage. Lidl staff also benefit from competitive holiday packages, which were also enhanced in October; and a 10% discount in Lidl stores.

- 5.31 Lidl also offer opportunities for career progression, through many different career paths and opportunities within the retail sector. These include managerial and administrative positions in addition to positions such as store assistants and cashiers. The company also runs comprehensive management development and training programmes, enhancing skills of staff and maximising staff retention.

- 5.32 When setting up a new store, Lidl would bring in a manager from another store that ideally has links with the area. This is vital to provide the necessary experience and leadership during the training period of the new store staff. It is then the responsibility of the store manager and district manager to recruit and train the necessary numbers of staff prior to store opening. New staff are recruited from the local community using a variety of methods, including local newspaper advertisements, Job Centre advertisements and open days.

#### DELIVERIES

- 5.33 Lidl products are purchased throughout Europe and then packaged and distributed directly to the relevant Regional Distribution Centre (RDC), of which there are currently 13 in the UK, for onward distribution to its stores across the UK. The nearest RDC to Monks Cross is in Doncaster.
- 5.34 Lidl are mindful of the need to minimise any disturbance to neighbouring residents and landowners. To assist in achieving this, each store has only one or two dedicated deliveries per day. Each delivery is undertaken by one delivery vehicle, which carries all of the necessary products for the store, including freezer and chilled products. Furthermore, during these deliveries the same delivery vehicle picks up any store waste, which is stored internally in the store warehouse. These delivery and waste pickup practices minimise disruption on the site and in the surrounding area.
- 5.35 Minimal noise is produced during deliveries, as delivery drivers are required to turn their engines off during the delivery; and the freezer and chilled products are carried using individual temperature-controlled units, which can be loaded onto the vehicle, meaning that there are no noisy air conditioning units fitted to the delivery vehicles. New stores (such as that proposed) also feature graded ramps in the delivery bay and manual dock levellers, negating the need for noisy scissor or tail lifts. The total unloading time for deliveries is approximately 45 minutes.

#### SUSTAINABILITY MEASURES

- 5.36 Lidl implement a variety of measures to minimise the environmental impact of its stores and contribute toward sustainability objectives, including:

Charging for carrier bags rather than hiding the cost through higher prices; this provides the customer with a clear financial incentive to re-use their bags;

Limiting deliveries to a maximum of two per day. Delivery vehicles are also used to remove waste from the store on their return journey to the RDC where the waste/recyclable material is sorted and managed centrally. This also helps to reduce vehicle trips and emissions;

Lidl lead the sector in terms of recycling and waste to landfill reduction by recycling paper/cardboard and plastic waste produced by the store. This means that over 80% of all waste produced in store is recycled;

Lidl stores include highly efficient condensing boilers, which recover waste heat from the combustion process. All heating is regulated by sensors;

Lidl stores use a manual dock leveller for deliveries, reducing noise emissions and energy use;

All Lidl stores are fitted with a 'Building Management System' incorporating movement sensors, Lux meters and thermostatic controls. This ensures that the back of house areas of the store are only lit when people are using them, that external lighting is only used when required and that the temperatures of the various areas within store are maintained at the correct levels. Energy efficient LED lighting is used and lighting within the sales area is cutback to one third before and after trading hours;

Water consumption is carefully monitored, and flow control devices and water meters are fitted in all stores; and



Car park lighting is designed in accordance with Lidl's 'Dark Sky' policy with light fittings carefully specified in order to keep light spill beyond the site boundary to a minimum, with Lux and time controls fitted.

- 5.37 Lidl also produce and implement Travel Plans to promote sustainable transport choices. A Travel Plan has been submitted as part of the application.
- 5.38 Lidl communicate to staff and customers on a continual basis and encourage all stakeholder: implement environmentally friendly practices where possible.

#### SECURED BY DESIGN AND DISABILITY DISCRIMINATION ACT

- 5.39 Lidl design their stores and sites to minimise anti-social behaviour and crime. Lidl provide open and well-lit schemes to deter criminal activity. Lidl will, if required, fit CCTV internally and/or externally to ensure the safety of staff, customers and property.
- 5.40 Lidl provides its customers with disabled car parking spaces that comply with the latest Regulations, ensuring infirm or wheelchair bound customers can manoeuvre as simply as possible. Lidl car parks are designed with the customer in mind to ensure that cars can pass easily into and around the car park. Disabled and parent and child spaces are positioned near the store entrance, in order to provide shorter walking distances from cars to the store.

#### SUMMARY

- 5.41 The key trading characteristics that distinguish Lidl from the mainstream convenience retailers and smaller independent retailers are therefore as follows: -
1. Restricted number of product lines – Lidl is not a one stop shop and sells a limited range of predominantly own brand goods, with customers visiting other stores for branded or luxury goods.
  2. Not the full retail offer – Lidl does not provide the full retail offer. A limited range of comparison goods are sold and the constantly changing nature of 'non-food specials' ensures that any impact of other retailers is not constant and is limited. Lidl stores do not offer the range of services provided by the mainstream food retailers or smaller independent stores.
  3. Small store size and localised catchment – Lidl stores do not draw customers from a wide area.
  4. Shorter trading hours – Lidl stores are not open 'all hours' and so do not attempt to compete with mainstream food retailers and local convenience stores.

The above factors ensure that the trading impacts of new Lidl stores on existing retailers and centres are very limited.

- 5.42 Lidl stores also bring substantial benefit to an area, including; new discount convenience retail options; new highly competitive retail employment opportunities; and a store which is designed and operated in a manner which seeks to minimise disruption and promote sustainability.

## 6 PLANNING POLICY CONTEXT

6.1 This section sets out the relative planning policy context of the proposed development at both a national and local level.

### NATIONAL POLICY

6.2 National planning policy for England is set out by the National Planning Policy Framework ('NPPF' or 'Framework'), the most recent iteration of which was published in September 2023. The NPPF is supplemented by the National Planning Practice Guidance (NPPG).

6.3 At the heart of the NPPF is a presumption in favour of sustainable development, which is at the heart of both plan-making and decision taking. For decision taking, this means: -

*Approving development proposals that accord with an up-to-date development plan without delay, or*

*Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*

- o The application of policies in this Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed, or*
- o Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against policies in this Framework taken as a whole.*

6.4 Section 4 of the Framework (Decision-making) confirms that local planning authorities approach decisions on proposed development in a positive and creative way by working *“proactively with applicants to secure development that will improve the economic, social and environmental conditions of the area.”*

6.5 Paragraph 48 states that *“Local planning authorities may give weight to relevant policies in emerging plans according to:*

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);*
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and*
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).”*

6.6 Section 6 of the Framework (Building a strong, competitive economy) states that *“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.”*

6.7 Section 7 of the NPPF (Ensuring the vitality and viability of Town Centres) highlights the importance of ensuring that the vitality and viability of defined Town Centres is maintained. Annex 2 of the NPPF defines a Town Centre (or any other centre) as: -

*“Area defined on the local authority’s policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.”*

- 6.8 In this context, Section 7 sets out the requirement for the sequential test to be applied on proposals for 'main town centre uses' out with the defined centres. Furthermore, this section sets out that a retail impact assessment should be applied to such development exceeding 2,500 sqm (provided that there is no locally set threshold).
- 6.9 Regarding the parameters of the sequential assessment, paragraph 87 sets out that *"Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered."*
- 6.10 Section 8 of the Framework (Promoting healthy and safe communities) asserts that "decisions should aim to achieve healthy, inclusive and safe places" which promote social interaction, safety, accessibility and healthy lifestyles.
- 6.11 Section 9 of the NPPF (Promoting sustainable transport) sets out that *"transport issues should be considered from the earliest stages of plan-making and development proposals"* and should assess impacts of development; opportunities for network improvements; potential to promote active travel; environmental impacts; and other relevant transport considerations.
- 6.12 Paragraph 111 of the Framework asserts that *"development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe"*.
- 6.13 Section 11 of the Framework (Making effective use of land) sets out that planning decisions should promote the effective use of land for necessary uses; and should prioritise the use of previously developed 'brownfield' land.
- 6.14 Section 12 (Achieving well-designed places) confirms that *"good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."* Further to this, paragraph 130 asserts that decisions should promote functionality; create visually attractive spaces; encourage development which is sympathetic to the surrounding character and history; establish or maintain a strong sense of place; maximise the potential of sites; and create safe, inclusive and accessible places.
- 6.15 Section 14 of the NPPF (Meeting the challenge of climate change, flooding and coastal change) highlights the importance of supporting the reduction of emissions; encouraging sustainability, through the design, construction and technology; and minimising vulnerability, through improved resilience.
- 6.16 Section 15 of the Framework (Conserving and enhancing the natural environment) sets out that development should contribute to and enhance the natural environment, including biodiversity and geodiversity; and avoid unacceptable levels of noise, light, air, ground and other types of pollution, and provide appropriate mitigation and/or remediation where required.

#### LOCAL PLANNING POLICY

- 6.17 York City Council does not have an adopted Local Development Plan. Instead, the Council rely on the City of York Draft Local Plan (April 2005), which was approved by the Council for development management purposes.
- 6.18 The policy context of the site and the relevant planning policies are outlined below.
- 6.19 The map extract below demonstrates that the site is not allocated for any particular purpose, but does fall within the defined settlement boundary for York.

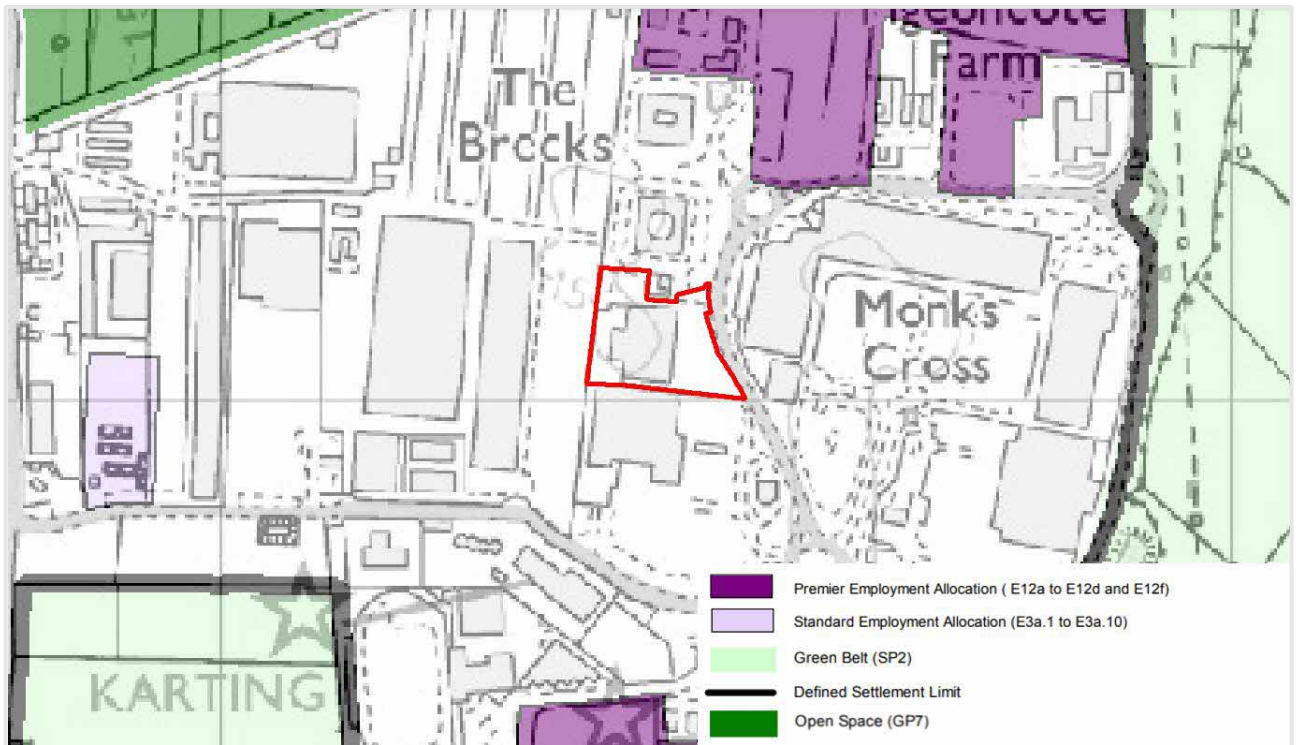


Figure 1: Extract from the Local Plan (2005) - North York proposals map.

#### City of York Draft Local Plan (2005)

Policy SP6 (Locational Strategy) seeks to direct development towards brownfield land within the built-up area.

Policy SP7a (The Sequential Approach to Development) requires that retail development outside of York City Centre is highly accessible by non-car modes of transport and follow the sequential approach. The policy also requires an assessment of the impact of development on designated centres for all “major shopping developments”.

Policy SP8 (Reducing Dependence on the Car) expects new development to reduce dependence on the private car, considering accessibility; air quality; parking and traffic. The policy also requires a Green Travel Plan to be submitted for development with 30 or more employees.

Policy GP1 (Design) outlines that development should:

- Respect and enhance the local environment;
- Incorporate an appropriate density, layout, scale, mass and design;
- Avoid the loss of open space;
- Incorporate appropriate landscaping;
- Protect valuable elements of the built and historic environment;
- Include suitable external lighting;
- Protect valuable public and private spaces;
- Include appropriate waste facilities;
- Minimise and mitigate against adverse impact on amenity;
- Accord with sustainable design principles;
- Provide toilets and baby changing facilities (in public and non-residential buildings); and
- Protect open space and ecological features.

Policy GP3 (Planning Against Crime) asserts that development should incorporate crime prevention measures, such as layouts that promote natural surveillance; secure locations for cycle parking; suitable lighting; and CCTV provision.

Policy GP4a (Sustainability) expects all commercial and residential development to be supported by a sustainability statement. The report should detail how the development will be sustainable in terms of accessibility, community, diversity, design, resources, pollution, the environment, energy and waste.

Policy GP9 (Landscaping) requires development to incorporate suitable landscaping as an integral part of the development, where appropriate.

Policy GP11 (Accessibility) requires development to demonstrate that suitable provision is made for all users.

Policy GP15a (Development and Flood Risk) expects development to incorporate appropriate and sustainable drainage, which reduces surface water run-off.

Policy GP16 (Shopfronts) asserts that new or altered shopfronts should respect the scale proportions, materials and architectural style of other buildings in the area.

Policy NE1 (Trees, Woodland and Hedgerows) affirms that development should seek to avoid the loss of or damage to existing trees, woodland and hedgerows; and provide replacement planting as required.

Policy T4 (Cycle Parking Standards) expects development to provide appropriate cycle parking, in accordance with adopted standards.

Policy T5 (Traffic and Pedestrian Safety) asserts (*inter alia*) that development should incorporate appropriate traffic and pedestrian safety measures, as required.

Policy T7c (Access to Public Transport) requires that all new development on sites of 0.4 ha or more is accessible by public transport, specifically (*inter alia*) within 400m of a bus stop with a frequency of at least one bus every 30 minutes.

Policy S6 (Control of Food and Drink (A3) Uses) sets out that development for food and drink uses will only be permitted where they (*inter alia*): avoid impact on neighbouring amenity; provide suitable car and cycle parking; include acceptable extraction measures; and address any security issues.

#### Huntington Neighbourhood Plan (2021)

6.20 The site falls within the area covered by the Huntington Neighbourhood Local Plan area, as such, the Huntington Local Plan is relevant to the proposed development. The Neighbourhood Plan policies deemed relevant to this proposal are outlined below: -

Policy H4 (Design Principles) expects development proposals to respect the character of their surroundings and avoid/mitigate against any adverse impacts on the amenity of neighbouring users.

Policy H10 (Vangrade/Monks Cross Shopping Park) seeks to restrict the development of non-retail uses within the shopping park.

Policy H13 (Hot Food Takeaways) asserts that hot food takeaways will only be supported within the Vangrade/Monks Cross Shopping Park; and such proposals should take into account the existing number and proximity of existing takeaways and the impact on amenity.

Policy H17 (Biodiversity) expects development to provide biodiversity net gain where possible and protect existing ecological and landscape features.

Policy H18 (Flooding and Water Management) requires that development avoids increasing flood risk, on site or elsewhere, and does not exacerbate existing drainage issues. The policy also sets

out that development should incorporate sustainable drainage, which adequately manages surface water run-off.

Policy H20 (Car Parking) asserts that development proposals should incorporate sufficient, safe and convenient car parking provision, in accordance with the adopted parking standards.

Policy H21 (Walking and Cycling) requires development proposals to ensure that there is sufficient safe and convenient access for cyclists and pedestrians. The policy also outlines that particular attention should be given to linking housing and key facilities, including the shops at Vangrade/Monks Cross Shopping Park.

#### Supplementary Planning Documents

- 6.21 Currently York City Council have three adopted Supplementary Planning Documents, none of which are considered relevant to the proposed development.

#### Emerging Local Plan

- 6.22 York City Council are currently in the process of producing a new Local Plan for the City. Following comments and instructions from the Inspector acting on behalf of the Secretary of State, the most recent draft version of the Local Plan was subject to public consultation between 13 February and 27 March 2023. The latest draft of the Local Plan contains the following policies deemed relevant to the proposed development:

Policy DP2 (Sustainable Development) sets out that development should *“create a prosperous city [...] provide good quality homes and opportunities [...] conserve, maintain and enhance the environment [and] ensure efficient and affordable transport links”*.

Policy DP3 (Sustainable Communities) expects development to promote sustainable communities, considering: heritage, the natural environment; design; societal issues and impacts, green infrastructure, accessibility, connectivity and flooding.

Policy SS1 (Delivering Sustainable Growth for York) sets out the growth requirements and spatial approach for the city, prioritising (*inter alia*) the redevelopment of previously developed land in the most sustainable locations; and the reduction of adverse impact.

Policy R1 (Retail Hierarchy and Sequential Approach) asserts that development should maintain the vitality and viability of the designated centres across the city; and following the sequential approach. The Policy also states that development proposals for ‘main town centre uses’ out with the designated centres must be accompanied by a retail impact assessment for developments exceeding: -

- o 1,500 sqm gross floorspace outside of York City Centre;
- o 500 sqm gross floorspace outside of a district centre; and
- o 200 sqm gross floorspace outside of a local centre.

Policy R4 (Out of Centre Retailing) confirms that out-of-centre retail proposals will only be deemed acceptable where: the sequential test is passed; the development will not result in significant adverse impacts on committed and planned development; and will not lead to individual or cumulative adverse impact on the vitality and viability of designated centres.

Policy D1 (Placemaking) expects development to improve poor existing urban and natural environments, considering: urban structure and grain; density and massing; streets and spaces; building heights and views; and character and design standards.

Policy D2 (Landscape and Setting) requires development proposals to deliver appropriate landscaping that considers and respects the existing trees, hedges, setting and landscape.

Policy D12 (Shopfronts) asserts that new shopfronts should conserve and enhance the qualities of buildings in the area; and relate well to the existing built environment.

Policy GI2 (Biodiversity and Access to Nature) expects development to conserve and enhance the natural environment by (*inter alia*) protecting, and where necessary replacing, important habitats (including veteran woodland and trees); and delivering a biodiversity net gain in line with The Environmental Act 2021 (when enforced).

Policy GI4 (Trees and Hedgerows) confirms that development will be supported where (*inter alia*) healthy mature trees and hedgerows are retained; and replacement planting is proposed (as necessary).

Policy CC2 (Sustainable Design and Construction of New Development) requires all development to achieve high standards of sustainable design and construction, promoting energy efficiency; a reduction in carbon emissions; water efficiency; and climate resilience. Specifically, where feasible and viable, non-residential development exceeding 100 sqm is expected to achieve: a 28% carbon reduction over and above the Building Regulations (2013); and BREEAM 'Excellent' (or equivalent).

Policy ENV1 (Air Quality) sets out that development will only be permitted where the impact on air quality is acceptable and/or can be mitigated.

Policy ENV2 (Managing Environmental Quality) states that development will be permitted where it does not lead to unacceptable impact on environmental quality and amenity, in terms of light, noise, vibration, air quality, fumes, odour, etc...

Policy ENV5 (Sustainable Drainage) asserts that development should include sustainable drainage. For brownfield sites, this includes offering a 30% reduction in run-off rates, when compared to existing.

Policy T1 (Sustainable Access) supports development which reduces the need to travel and provides access via all transport modes, prioritising more sustainable modes of transport.

Policy T7 (Minimising and Accommodating Generated Trips) expects (*inter alia*) development to avoid adverse impacts on the safety and efficiency of the transport network.

## SUMMARY

6.23 From the foregoing commentary, the following conclusions are reached:

1. York City Council do not currently have an adopted Local Development Plan, but are in the process of producing a new Local Plan. In this context limited weight can be given to the City of York Draft Local Plan (2005) and the emerging York Local Plan. However, full weight can be given to the 'made' Huntington Neighbourhood Plan (2021); and the NPPF (2023).
2. National planning policy sets a precedent in favour of sustainable development, with a strong emphasis on planning being used in a positive manner to facilitate economically, socially and environmentally sustainable growth. In this context, planning should be operated to encourage and not act as an impediment to growth.
3. Whilst planning policy aims to direct retail development towards designated centres, edge- and out-of-centre retail development can be deemed acceptable, where it is demonstrated that the proposed development successfully meets the requirements of the sequential and imp assessments. In this case it is worth noting that whilst the proposed development site is in an out-of-centre location, the 'made' Neighbourhood Plan is supportive of retail within Monks Cross Shopping Park.

4. Other material considerations, such as access, design, drainage, amenity, noise, lighting, landscaping, sustainability and contamination should also be suitably addressed as part development proposals.



## 7 SEQUENTIAL SITE ASSESSMENT

7.1 As part of Planning Permission Ref. 22/01135/FULM, a sequential site assessment was prepared and submitted by DPP Planning (DPP). Prior to undertaking the sequential assessment, the scope of the search was agreed with York City Council. The agreed scope and the findings of the assessment are summarised out below.

7.2 Rapleys also provide an update to the assessment, outlining any changes since the assessment was undertaken.

### AREA OF SEARCH

7.3 The area of search was agreed with York City Council for Planning Permission Ref. 22/01135/FULM as part of the sequential assessment. The centres considered as part of the sequential assessment were as follows: -

York City Centre;  
Haxby District Centre;  
Brockfield Shops Neighbourhood Parade;  
Monkton Road Neighbourhood Parade; and  
Hawthorn Terrace Neighbourhood Parade.

7.4 The assessment also considered the potential for the proposed store to be delivered in the following locations allocated for retail development: -

Castle Gateway Opportunity Area; and  
York Central.

### SEARCH PARAMETERS

7.5 The sequential report sets out the search parameters for the sequential assessment. The assessment looked for sites that met the following criteria: -

Sites measuring at least 0.6ha for a standalone store to 1.6ha for a mixed-use scheme;  
Sites or units with the ability to house a store measuring between 1,300sqm to 2,461sqm;  
Vacant units measuring at least 90% of the proposed unit size; and

Sites with that can deliver:

- Suitable surface level parking;
- Appropriate servicing arrangements;
- A single-storey unit, with an open and unrestricted sales floor area;
- A generally flat and level topography; and
- A level of visibility and accessibility that enables the store to attract suitable passing trade.

### SEQUENTIAL ASSESSMENT FINDINGS

7.6 A summary of the findings, based on the above parameters, are set out below. Full findings are available in the Sequential and Retail Impact Assessment submitted as part of Planning Permission Ref. 22/01135/FULM.

#### York City Centre

7.7 The assessment found a number of vacant units within and on the edge of York City Centre. The majority of the sites identified were either too small; and/or did not have appropriate parking or servicing facilities.

7.8 One site, 3 St Marys Square, did comprise a unit large enough to accommodate a discount foodstore. However, this site did not have the potential to deliver suitable parking facilities to serve the proposed foodstore development.

#### Haxby District Centre

7.9 The assessment did not find any vacant units or sites within or on the edge of Hexby District Centre, nor were there any development sites in or on the edge of the centre. As such, the assessment found there to be no sequentially preferable sites in relation to Haxby District Centre.

#### Neighbourhood Parades

7.10 The assessment highlights that the neighbourhood parades at Brockfield Shops; Monkton Road; and Hawthorn Terrace are small in nature and sit at the bottom of the centre hierarchy set out in the draft Local Plan. As such, it was concluded that it would not be feasible or appropriate to deliver the proposed foodstore in such a location.

#### Castle Gateway Opportunity Area

7.11 The assessment confirmed that, whilst the draft Local Plan does offer opportunity for such retail development to be delivered in the Castle Gateway Opportunity Area, this location would not be suitable due to the masterplan for the site and heritage constraints. Even with a suitable level flexibility, it is considered that the proposed foodstore would not be in keeping with the visions of the masterplan for the site, which seeks to deliver smaller scale retail provision.

#### York Central

7.12 The assessment found a number of reasons to dismiss the York Central site, namely: -

*The proposed retail element of the masterplan being located beyond the edge of centre location; The masterplan not proposing any standalone parking for the retail element would render the development unsuitable for Lidl; and The timeframes for the delivery of the retail element of masterplan is unclear, but is almost certain beyond the timeframes of Lidl's requirement to deliver a new foodstore within the York area in the short-term.*

#### Other Out-of-Centre Sites

As part of the assessment it was also considered the suitability and availability of a number of out-of-centre locations. The findings of this search are outlined in the table below: -

Site	Reason(s) for Dismissal
Land at Lea Way, Huntingt York	The site is too small to accommodate the p development.
Lime Trees, 31 Shipton Ro York	The site is located within the Green Belt; The site houses a number of protected trees; and The site does not offer a suitable level of visibility.
ST8 - North of Monks Crc Urban Extension	The site was subject to a 'live' outline planning applicatio which only incorporated 200sqm of retail, which preclude the development of the proposed foodstore on th site.
ST9 - North of Haxby Urt Extension	A foodstore on the site would need to be delivered as part of a mixed-use development; and it was not considered that there was any prospect of such a development cc forward.

Site	Reason(s) for Dismissal
	The site was not considered to be available at the time of the assessment.
ST7 – Land to the East of Metcalfe Lane New Settlement	The site was not considered to be available within appropriate timescale
St14 – West of Wiggington Lane New Settlement	The site was not considered to be available within appropriate timescale

## YORK CITY COUNCIL RETAIL COMMENTS

7.13 As part of Planning Permission Ref. 22/01135/FULM's consideration, York City Council sought independent advice on retail planning policy matters from Lambert Smith Hampton (LSH). The LSH advice provided the following comments on the sites assessed by DPP: -

*"We agree with the conclusions regarding these lower order centres [Neighbourhood Parades].*

*[...]*

*We agree that sites in the historic core of York would not be suitable for the proposed development;*

*We do not agree that 3 St Mary's Square, York can be discounted, as there is no justification for stipulating surface car parking. As set out in the SRIA (paragraph 4.22), the unit provides a total of 3,439 sq.m of floorspace and 300 car parking spaces, albeit these are in a multi-storey car park. Our own research however, suggests this unit is under offer and is no longer being marketed;*

*We agree that the identified edge of centre units would not be suitable for the proposed Lidl;*

*The Council's ambitions for the Castle Gateway Opportunity (Site ST20) are set out in Policy SS5 of the ELP. We agree that the development of a Lidl would be unlikely to meet these requirements and the site can therefore be discounted;*

*We disagree with DPP's comments regarding the York Central site (Site ST5) not being sequentially preferable, simply because it is more than 300m from the shopping area boundary, as the NPPF is clear that preference should be given to accessible sites that are well connected to the town centre (NPPF, paragraph 88). This location would therefore be preferable to the application site. We would also note that since the original SRIA was prepared, a number of applications to discharge conditions have been submitted to the City Council.*

*It is also of note that the Retail Impact Assessment that accompanied the outline application tested two trading scenarios including a 2,500 sq.m supermarket. However, we also note that the Transport Assessment accompanying the application assumes just 10 car parking spaces are proposed to serve the overall retail development, and as such the proposed Lidl could not be accommodated within the approved Masterplan.*

*We agree that there are no sequentially suitable sites / units available in Haxby District Centre.*

*We agree that the majority of out-of-centre sites identified by DPP cannot be considered to be sequentially preferable. However, we have concerns regarding the dismissal of sites simply on the basis that planning applications have not been submitted to date, as, unless there is retailer interest then this would not be an unusual situation. However, we would agree that none of the sites considered could be considered to be sequentially preferable to the application site, given the neighbourhood Plan's support for retail uses at Monk's Cross and the relative locations of the sites."*

7.14 Based on the above points LSH concluded that: -

*"We therefore agree with DPP that the sequential assessment provided confirms that there are no*

*sequentially preferable sites available for the proposed Lidl store. As a result, even if a sequentially preferable site were available for the drive-thru, it would not be possible to accommodate both elements of the proposed development and thus compliance with the sequential test has been demonstrated.”*

#### RAPLEYS ADDITIONAL ASSESSMENT

- 7.15 As outlined above, the sites previously assessed under Planning Permission Ref.. 22/01135/FULM were all found to be either unsuitable or unavailable, meaning that the sequential assessment was passed. Given that the proposed foodstore is of a very similar scale and nature to the previously approved scheme, it is considered that these conclusions also apply to this proposal.
- 7.16 Furthermore, Planning Permission Ref. 22/01135/FULM remains extant and therefore, the applicant has a legitimate fallback position to the scheme proposed through this new planning application. This is an important material consideration in the application’s determination.
- 7.17 Nevertheless, Rapleys has undertaken an additional sequential assessment to account for any changes in the property market since the previous sequential assessment was undertaken. This assessment utilises the same search criteria and assesses the same centres as the DPP assessment.
- 7.18 The additional assessment comprised a review of online property databases (Estates Gazette, Prime Location, Rightmove and Nova Loca), with any sites of a suitable size being identified and assessed. An assessment of any sites found to exceed the minimum site area (0.6 ha) or unit size (1,300 sqm) for this assessment is set out in the tables below.

#### York City Centre

Site	Site Area (ha) / Unit Size (sqm)	Reason(s) for Dismissal
Development site – In-centre 3 Toft Green, York, YO1 6JT	1,537 sqm	The site is currently subject to a ‘live’ planning application for an office development. The site does not have a prominent frontage. There is no parking provision, nor could parking be feasibly delivered.
Existing retail unit – In-centre 4/6 Parliament Street, York, YO1 8SE	1,443 sqm	The unit is spread over three floors, meaning that there is no contiguous floorspace large enough to accommodate the sales area of a discount foodstore. There is no parking provision, nor could parking be feasibly delivered.
Existing retail unit – Edge-of-centre Warehouse, 95 James Street, York, YO10 3DW	0.30 ha 1,348 sqm	The existing unit is too small to accommodate the required sales area, warehousing and ancillary areas. The site is too small to accommodate a newbuild foodstore development and the associated parking required.

Site	Site Area (ha) / Unit Size (sqm)	Reason(s) for Dismissal
<p>Development Site – Edge-of-Centre</p> <p>Bootham Park Hospital, Bootham, York</p>	7.22 ha	<p>The site is subject to extant planning permission for the “<i>Change of use, demolition and erection of new buildings to create residentialia community</i> [...]”. Given this, it would be inappropriate to submit a new proposal for a discount foodstore on the site.</p> <p>The site is located within a Conservation Area; and houses a number of Listed Buildings. This would preclude a development of the nature proposed.</p> <p>The undeveloped area is allocated as “open space” in the Local Plan, which prohibits development in this area.</p>
<p>Existing office unit – In-centre</p> <p>East Coast House, 25 Skeldergate, York, North Yorkshire, YO1</p>	2,021 sqm	<p>The unit is spread over two floors, meaning that there is no contiguous floorspace large enough to accommodate the sales area of a discount foodstore.</p> <p>The remainder of the office complex is available, meaning that redevelopment of the site would not be possible.</p> <p>There is no parking provision, nor could parking be feasibly delivered.</p> <p>The site does not offer adequate visibility access to attract sufficient passing trade.</p>

#### Haxby District Centre

- 7.19 The Rapleys review has not revealed any potential sequentially preferable sites in or on the edge of Haxby District Centre.

#### Out-of-centre sites

- 7.20 Whilst Monks Cross does not form part of the retail hierarchy, it is considered that the adopted Neighbourhood Plan policy sets this location as a preferred location for retail over other out-of-centre locations. As such, this assessment only considers other out-of-centre sites where the principle of retail use has already been established. This approach was confirmed to be acceptable by LSH in their commentary on application ref. 22/01135/FULM.
- 7.21 Applying this approach, no out-of-centre sites (other than those previously assessed by DPP) have been identified.

#### SUMMARY

- 7.22 As set out above, a sequential assessment was previously undertaken of various centres within York, in support of Planning Permission Ref. 22/01135/FULM. Subsequently, Rapleys has undertaken an updated assessment of potential sequentially preferable sites.
- 7.23 The previous assessment concluded that there were no suitable or available sequentially preferable sites within the vicinity of the proposed development site. York City Council’s independent retail consultee, Lambert Smith Hampton, agreed with this conclusion; and confirmed that the sequential assessment was acceptable. Given that the proposed development is broadly the same as previously approved development, it is considered that the conclusions of the previous assessment and LSH conclusions are still appropriate in this case.

- 7.24 The additional sequential assessment, undertaken by Rapleys, has identified a number of additional sites, which were not previously assessed. All of these sites are understood to be available at the time of writing, however, none were considered suitable for a discount foodstore development.
- 7.25 Based on the above, it is concluded that the proposed development site is sequentially preferable and the sequential assessment is passed. As such, the proposed foodstore development is considered to be acceptable from a sequential perspective.

## 8 RETAIL IMPACT ASSESSMENT

8.1 This section sets out the applicant's approach to the retail impact assessment taking into consideration the site's location and the requirements of national and local retail policy.

8.2 The approach taken for this assessment builds upon the previous assessment undertaken by DPP in support planning permission 22/01135/FULM. This current assessment utilises the following base assumptions/ data implemented by DPP:

Base and design years of 2022 to 2026. Allows for a three year assessment period, in line with national policy guidance.

Utilises the same base expenditure data, growth data, and Household Survey data.

Utilises the same benchmarked turnover and Household Survey derived turnover data existing stores within the study area.

Utilises the same trade diversion patterns provided by DPP, given that the proposed foodstore is broadly similar in scale and format to the foodstore approved under planning application 22/01135/FULM.

Assumes that the proposal will continue to have a 5 – 10 minute drivetime catchment area.

8.3 Utilising previous base information submitted in support of the current planning consent (22/01135/FULM) allows for easier comparison between both proposals, and to highlight the minimal impact changes between them.

8.4 Notwithstanding the above, and the utilisation of DPP broad methodology on the impact assessment, one change / update has been made. It should be noted that DPP utilised Household Survey derived comparison goods turnovers for a number of stores(1) in the absence of Household Survey derived convenience turnovers for these stores.

8.5 We understand the broad reasoning for utilising these turnovers (comparison goods) , as these stores do generate trade, otherwise they would not exist. However, the assessment provided by DPP only considers convenience goods trade diversion. It is considered that convenience goods turnovers should have been used. As such, benchmarked convenience goods turnovers have been utilised for these stores.

8.6 In addition, we note that a 1% (£0.01m) convenience goods trade diversion pattern was also applied to 'Other Comparison' locations within Zone 2 (Acomb District Centre), within the original assessment. This is a minor error, as the 'Other Comparison' category has no turnover attributed to it, and the assessment is on convenience goods diversion. Nonetheless, this error has been retained – in order to keep diversion patterns the same as the original assessment.

8.7 Furthermore, this assessment provides commentary on the potential trade generated by the proposed drive-through unit. This commentary seeks to address consultee observations on the original proposal.

8.8 In light of all of the above, the updated assessment is outlined below.

### PROPOSED VS PERMITTED DEVELOPMENT TURNOVERS

8.9 It is important to recognise that the application site already has extant planning permission (22/01135/FULM) for a new Lidl foodstore, albeit a store which is smaller in size than the current proposal. Table 8.1 below outlines turnover differences between the permitted foodstore development and the proposed larger foodstore development subject to this planning application.

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<sup>1</sup> Sainsbury's Local, Davygate; Co-op, Tang Hall Lane; Spar, 17 Bridge Street; DPP Sequential & Retail Impact Assessment – Appendix 2 – Table 8 – Trade Diversion & Impact.

Table 8.1. Benchmarked Turnover Difference Between Permitted and Proposed Development

	Permitted Development Turnover (£m)	Proposal Development Turnover (£m)	Difference in Turnover (£m)
<b>2022</b>			
Convenience	£10.18	£10.57	£0.39
Comparison	£1.39	£1.44	£0.05
<b>Total</b>	<b>£11.57</b>	<b>£12.01</b>	<b>£0.45</b>
<b>2026</b>			
Convenience	£10.37	£10.78	£0.40
Comparison	£1.51	£1.57	£0.06
<b>Total</b>	<b>£11.89</b>	<b>£12.35</b>	<b>£0.46</b>

Source: Appendix 3 – Table 1A.

- 8.10 Table 8.1 above demonstrates that there will be a circa. 3.8% uplift in overall turnover in 2022 (£0.45m) and 2026 (£0.46m). In 2022, convenience goods turnover will be uplifted by £0.39m, w/ comparison goods turnover will be uplifted by just £0.05m. This raises to £0.40m and £0.06m respectively by 2026.
- 8.11 It is envisaged that the drive-through element of the could trade at £5,000 per sq.m, with a gross to net sales ratio of up to 70%. On this basis, Table 8.2 below sets out the indicative turnover of the drive-through element of the development, as permitted and as proposed.

Table 8.2. Indicative Benchmarked Turnover – Drive-Through.

	Permitted Drive-Through (£m)	Proposed Drive-Through (£m)	Difference (£m)
2022 Sales (£m)	£0.59	£0.85	£0.26
2026 Sales (£m)	£0.64	£0.92	£0.28

Source: Appendix 3 – Table 1B.

- 8.12 By 2026, indicative turnover of the drive-through will increase by £0.28m, from £0.64m to £0.92m.
- 8.13 Notwithstanding this position, it is also important to recognise that the principle of open retail sales within the former TK Maxx Unit, through the granting of a Certificate of Lawful Existing Use (Ref 18/0224/CLU), has already been established. Consequently, the existing unit could technically be operated as a foodstore, of the type proposed. As such, a foodstore larger than that permitted (currently proposed) could be operated from the existing unit.
- 8.14 Assuming that 70% of the former TK Maxx unit's GIA (1,886 sq.m) could be used as net sales floorspace, a typical Lidl foodstore with a 80/20% split between convenience and comparison goods sales, could trade at a level well above the store proposed within this planning application. Table 8.3 below demonstrates the difference in potential benchmarked turnover of the existing TK Maxx unit trading as a Lidl foodstore versus the development proposed.



Table 8.3. Benchmarked Turnover Difference Between Former TK Maxx Unit and Proposed Development

	Former TK Maxx Unit trading as a Lidl – Benchmarked Turnover (£m)	Proposed Lidl – Benchmarked Turnover (£m)	Difference in Turnover (£m)
<b>2022</b>			
Convenience	£13.19	£10.57	£2.61
Comparison	£1.79	£1.44	£0.36
<b>Total</b>	<b>£14.98</b>	<b>£12.01</b>	<b>£2.97</b>
<b>2026</b>			
Convenience	£13.44	£10.78	£2.66
Comparison	£1.96	£1.57	£0.39
<b>Total</b>	<b>£15.40</b>	<b>£12.35</b>	<b>£3.05</b>

Source: Appendix 3 – Table 1A & 1C.

- 8.15 Table 8.3 above demonstrates that where Lidl to occupy the existing former TK Maxx Unit, their retail operation could potentially trade circa. 25% (£2.97m [2022]) above that currently proposed.
- 8.16 Additionally, the existing adjacent unit (formerly operated by Argos) can still be occupied by a non-food retailer. This unit will be lost as a result of the proposed development. Overall, the development proposed represents a net loss in tradable retail floorspace across the entire site, and will also result in the loss (in principle) of non-food retail sales across the site. This, in our view, should be viewed by the decision maker as a net positive.
- 8.17 In addition, the proposal would regularise retail uses across the site and will increase the Council's ability to control future uses, through the use of planning conditions. This should be seen as a positive, in terms of potentially protecting the future vitality and viability of York City Centre, and other centres within the retail hierarchy.

#### PLANNING COMMITMENTS

- 8.18 At the time writing this assessment, Rapleys are not aware of any new planning commitments, over and above that considered originally under the permitted development (Ref. 22/01135/FUL).

#### TRADE DIVERSION

- 8.19 As highlighted above, the impact assessment submitted in support of the permitted development (Ref.22/01135/FUL) only considered the then proposed foodstore's convenience goods impact c other locations. Consequently, the trade diversion and impact patterns provided below, only relate to the proposed foodstore's convenience goods impact.
- 8.20 In addition, it should also be recognised that in regard to impact, the Planning Committee Rep submitted by Officer's on the permitted development (22/01135/FUL) concluded that:
- "..LSH [LPA's retained planning consultant] expresses major concerns over the trade draw and impact forecasts prepared by DPP and does not consider that they can be relied upon by Council. However, their own assessment of likely trade draw, informed by the accompany, household survey, confirms that any impacts on in centre foodstores will be extremely limited...[Our emphasis]"*
- 8.21 Furthermore, LSH within their advice note to LPA, did not agree with the outlined trade diversion patterns, but they ultimately conclude that:

*“We have not sought to quantify the levels of trade draw but would note that none of the main stores likely to be affected are located within or on the edge of a defined centre. On this basis we conclude that the effect of the proposed Lidl development on existing centres will not be significantly adverse. [Our emphasis] This includes York City Centre, Haxby District Centre and the closest neighbourhood centres at Brockfield Park and North Moor Road.”*

- 8.22 In consideration of the above, it should be noted that the current proposal subject to this planning application is broadly similar to that already granted planning consent, in terms of scale and format. The key change is that current proposal is for a new build foodstore unit, as opposed to the reconfiguration of existing units to allow a foodstore to trade. Planning Permission Ref. 22/011/35/FUL remains extant and therefore, represents a fallback position to the development proposed through this planning application.
- 8.23 As such, given the similarities between the schemes, it is considered that the development proposed through this planning application will have the same or very similar impact to the scheme already permitted; therefore, as previously concluded by LSH, the proposed Lidl foodstore should not have a significant adverse impact on the vitality and viability of existing centres.
- 8.24 Notwithstanding the above, Table 6 of Appendix 3 outlines full trade draw patterns for both the permitted development (22/011/35/FUL) and the proposed foodstore. It also outlines the trade draw and impact differences between both schemes. For the readers assistance, Tables 8.4 and 8.5 below summarises trade draw and impact patterns, plus the difference in these patterns between both proposals.

Table 8.4. Summary Trade Draw Pattern (£m)				
York City Centre	Permitted Scheme – 2026	Proposed Scheme – 2026	Difference (£m) - 2026	
Marks & Spencer	£0.24	£0.25	£0.0094	
Tesco Express, Picadilly,	£0.03	£0.03	£0.0010	
Tesco Express, Goodramgate,	£0.03	£0.03	£0.0010	
Sainsburys Local, Davygate,	£0.03	£0.03	£0.0010	
<b>York City Centre Sub- Total</b>	<b>£0.32</b>	<b>£0.33</b>	<b>£0.0124</b>	
Foss Island Retail Park Sub- Total	£0.97	£1.01	£0.0375	
Out of Centre Sub- Total	£1.39	£1.44	£0.0535	
Acomb District Centre Sub- Total	£0.44	£0.46	£0.0170	
Zone 2 – Out of Centre Sub- Total	£1.15	£1.20	£0.0445	
Haxby District Centre Sub- Total	£0.32	£0.33	£0.0122	
Clifton Road Local Centre Sub- Total	£0.00	£0.00	£0.00	
Strensall Local Centre Sub- Total	£0.06	£0.06	£0.0024	
Monks Cross Retail Park Sub- Total	£4.20	£4.36	£0.1623	
Clifton Moor Retail Park Sub- Total	£0.40	£0.41	£0.0154	
Zone 3 – Out of Centre Sub- Total	£1.13	£1.17	£0.0435	
<b>Sum Total</b>	<b>£10.37</b>	<b>£10.78</b>	<b>£0.4007</b>	

Source: Appendix 3 – Table 6. Figures rounded +/-.

Table 8.5. Summary Impact Pattern (%)

York City Centre	Permitted Scheme – 2026	Proposed Scheme – 2026	Difference (£m) - 2026
Marks & Spencer	2.60%	2.70%	0.10%
Tesco Express, Picadilly,	2.70%	2.81%	0.10%
Tesco Express, Goodramgate,	10.90%	11.32%	0.421%
Sainsburys Local, Davygate,	0.74%	0.77%	0.03%
<b>York City Centre Sub- Total</b>	<b>2.28%</b>	<b>2.37%</b>	<b>0.088%</b>
Foss Island Retail Park Sub- Total	2.01%	2.09%	0.78%
Out of Centre Sub- Total	3.31%	3.44%	0.128%
Acomb District Centre Sub- Total	0.73%	0.78%	0.047%
Zone 2 – Out of Centre Sub- Total	1.35%	1.40%	0.052%
Haxby District Centre Sub- Total	2.19%	2.27%	0.084%
Clifton Road Local Centre Sub- Total	0.00%	0.00%	0.00%
Strensall Local Centre Sub- Total	1.37%	1.42%	0.053%
Monks Cross Retail Park Sub- Total	3.98%	4.13%	0.154%
Clifton Moor Retail Park Sub- Total	1.12%	1.17%	0.043%
Zone 3 – Out of Centre Sub- Total	3.00%	3.11%	0.116%
<b>Sum Total</b>	<b>2.32%</b>	<b>2.41%</b>	<b>0.09%</b>

Source: Appendix 3 – Table 6. Figures round +/-.

- 8.25 As Tables 8.4 and 8.5 above demonstrate there will be marginal increases in trade draw and impact between the planning approved development and the proposed development subject to this planning application.
- 8.26 No one location will see an increase in trade diversion of more than £0.16m (Monks Cross Retail Park), whilst the average increase in impact will be 0.1% of less.
- 8.27 The proposed impact on York City Centre will be 2.37%, up by 0.088%; whilst impact on other centres will be no more than 2.27% (Haxby District Centre), up by just 0.084%.
- 8.28 Given the limited identified increases outlined above, it is considered that the proposed foodstore will not lead to any significant adverse impacts on any one centre; with no significant changes to the impact position arising when compared to the already consented scheme (22/01135/FUL). The proposed foodstore is therefore considered to be in accordance with City of York Draft Local Plan (April 2005) policies and national planning guidance with regard to the retail impact tests.

PROPOSED DRIVE- THROUGH UNIT

- 8.29 In consideration of the permitted proposal (Ref.22/011135/FUL), LSH previously commented:

*“When considered in terms of cumulative impact, the combined impact with the turnover of the drive-thru should be assessed, as should the convenience trade draw of the Lidl with committed convenience store developments. Neither have been considered by DPP and consider this a deficiency of the submitted RIA..”*

8.30 In this regard, we note that the Planning Practice Guidance (PPG) (Town centres and retail) advises that not all main town centre uses require their impacts to be assessed over a certain period of time. It states:

*“The purpose of the test is to consider the impact over time of certain out of centre and edge of centre proposals on town centre vitality/viability and investment. The test relates to retail and leisure developments (not all main town centre uses) [Our emphasis] which are not in accordance with up to date plan policies and which would be located outside existing town centres. It is important that the impact is assessed in relation to all town centres that may be affected, which are not necessarily just those closest to the proposal and may be in neighbouring authority areas.”*

Paragraph: 014 Reference ID: 2b-014-20190722

8.31 Furthermore paragraph 90 of the NPPF (2023) only requires the assessment of impact on retail and leisure uses.

8.32 Nonetheless, the proposed drive-through could indicatively generate £0.92m in trade by 2026. Given the existing level (substantial) of food and beverage offers in and around Monks Cross and the City Centre, it is considered that the proposal will not divert a significant quantum of trade that would undermine the vitality and viability of these facilities. Furthermore, a sizable proportion of existing facilities that could be affected by the proposal are in edge or out of centre locations; and as such, are afforded limited to not protection from competition in planning policy terms.

#### IMPACT OF THE PROPOSAL UPON EXISTING, COMMITTED AND PLANNING PUBLIC AND PRIVATE INVESTMENT IN A CENTRE OR CENTRES IN THE CATCHMENT AREA OF THE PROPOSAL.

8.33 From the research which has been undertaken in support of the application, Rapleys is not aware of any existing, committed or planned public and private investment within the assessed retail centres, or any other retail centre that could be adversely affected by the proposed development.

8.34 In consideration of development plan allocations, DPP previously noted that the Castle Gateway Opportunity Area (ST20) and York Central (ST5) allocation would not be adversely impacted upon given that the LPA's ambition was to provide local small scale convenience retail to complement the masterplan for ST20; and given retail development was not a key component to the delivery of ST5.

8.35 In regard to other strategy allocations (Allocations ST7, ST8, ST 9, ST14) DPP noted that there was neither a planning application supporting retail development on these site, and/or the level of retail proposed would be limited to small-scale convenience stores. DPP concluding that proposal's would not undermine planned investment.

8.36 Notwithstanding the above, Officer's agreed<sup>2</sup> with DPP's overall assessment that foodstore proposal's of the scale outlined would not cause any adverse impacts on investment.

8.37 Given that current proposal's, subject to this planning application, are broadly similar in scale and nature to that granted planning consent (Ref. 22/011135/FUL), it is considered that previous assessments and conclusions (under Ref. 22/011135/FUL) are still applicable.

8.38 Based on the above, it is considered that the proposal will not have an adverse impact on public and private planned investment. Accordingly, it is considered that the proposal complies the NPPF tests in this regard.

#### VITALITY AND VIABILITY OF CENTRES WITHIN THE CATCHMENT

8.39 The NPPG advises that a judgement as to whether the likely adverse impacts are significant can only be reached in the context of understanding the current vitality and viability of any affected defined centres within the catchment.

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<sup>2</sup> Planning Officers Report Ref. 22/011135/FUL, paragraph 5.14.

8.40 DPP previously concluded that overall York City Centre was in good health based, with the centre supported by high levels of footfall, and having a below UK average vacancy rate of 5.3%.

8.40 Given the marginal uplift in trade draw and resultant impact arising from the development proposed when set against the already consented scheme, it is considered that the assessed centres will continue to be in good health, post development implementation.

8.41 Furthermore, the proposals represent a net loss in tradable floorspace across the entire site. Consequently, it is considered that, as proposed, the proposals have the potential to reduce overall competition with other retail centres within the Borough.

8.42 Accordingly, the development is therefore considered to be fully compliant with this criterion in paragraph 90 of the NPPF.

#### SUMMARY

8.43 In summary, it has been demonstrated within the above analysis that the application proposal will not have a significant adverse impact on the vitality and viability of York City Centre, with an impact of just 2.37%.

8.44 The proposed foodstore will result in marginal uplifts in both trade draw and impact when set against the foodstore proposals which have already been granted planning consent (22/01135/FUL) at the application site.

8.45 In addition, it should be noted that the proposals actually represent a net loss in tradable floorspace across the entire application site.

8.46 The development also signals Lidl's commercial intent to improve consumer choice within the Monks Cross area, which will have associated economic investment benefits. Whilst an out-of-centre location, the application site is considered to be the only sustainable location outside of an identified centre within the retail hierarchy, which can meet the applicant's retail requirements and the requirements of shoppers in Monks Cross.

8.47 It is considered that the proposals are in accordance with the NPPF, NPPG and all retail related City of York Draft Local Plan (April 2005) policies.

## 9 PLANNING ASSESSMENT

9.1 Based on the preceding review and analysis of the planning policy, guidance and material considerations relevant to the site and the proposals, the key planning issues relevant to the determination of this application are as follows: -

Principle of Development;  
Retail Policy Matters;  
Economic Benefits;  
Transportation and Highways;  
Flood Risk and Drainage;  
Noise;  
Air Quality;  
Landscaping;  
Ecology;  
Contamination; and  
Sustainability.

9.2 Each of the above topics are addressed in turn below.

### PRINCIPLE OF DEVELOPMENT

9.3 This planning application seeks consent for the demolition of the existing building and erection of a new Lidl foodstore (Use Class E) and drive-through unit with associated car parking and landscaping. Unit 2, Monks Cross Drive, Huntington, York YO32 9GX.

9.4 The existing unit on the site was previously utilised as a TK Maxx store, with part of the unit having consent for open A1 (now E class) use. As such, the principle of retail use is clearly established on the site.

9.5 Further to this, and as outlined above, the proposed development site has extant planning consent for a similar scheme to that proposed through this planning application. This planning consent is considered to clearly establish the principle of redevelopment on the site; and the principle of the use of the site for the purposes of a discount foodstore and drive-through unit.

9.6 Based on the above, and subject to addressing other material considerations, the principle of the proposed redevelopment of the site is understood to be supported.

### RETAIL POLICY MATTERS

9.7 Given the out-of-centre location of the proposed development, this application is supported by sequential assessment and retail impact assessment. The need for these two retail assessments is set out through the NPPF and the Draft Local Plan.

9.8 Paragraphs 86 of the NPPF confirms that a sequential test should be applied as part of planning applications for 'main town centre uses' that are located out with an existing centre; and are not in accordance with an up-to-date Local Development Plan. Further to this, Paragraph 87 confirms that when considering edge and out of centre proposals, preference should be given to well-connected locations; and an appropriate level of flexibility should be applied. Meanwhile, Policy SP7a of the Draft Local Plan reaffirms that the sequential approach should be applied and out-of-centre retail should be located in accessible locations.

9.9 Paragraph 89 of the NPPF also sets out that edge or out of centre retail development exceeding 2,500 sqm GIA should be accompanied by a Retail Impact Assessment (RIA). At present there is no adopted local threshold for RIA's in York, however, Policy R1 of the emerging Local Plan sets out a threshold of 200 sqm for this location.

- 9.10 In the above context, this application is supported by an appropriate Sequential Assessment, in line with national and local planning policy. As outlined in Section 7 above, the Sequential Assessment demonstrates that there are no suitable or available sites in sequentially preferable locations. As such, it is concluded that the proposed development site is sequentially preferable.
- 9.11 This application is also supported by a Retail Impact Assessment, a summary of which can be found at Section 8 with the full results at Appendix 3. The Assessment concludes that the proposed development will not have an unacceptable adverse impact on the vitality and viability of neighbouring centres.
- 9.12 Given the above, it is considered that the proposed development is in accordance with national and City of York Draft Local Plan (April 2005) policies and policies of the emerging Local Plan. . Therefore, the development is considered acceptable, subject to addressing other material considerations.

#### ECONOMIC BENEFITS

- 9.13 The proposed foodstore development will provide numerous economic benefits, including: -
- Up to 40 new well paid jobs, with a minimum hourly rate of £11.40; no zero-hour contracts; and numerous other benefits.
  - A multimillion-pound investment for the local area, making use of a disused site.
  - New discount shopping facilities for local residents, which could help locals save money on their groceries spending.
- 9.14 Given the economic benefits of the proposed development, it is considered that the proposed development is principally supported by Section 6 of the NPPF, which focuses on building a strong and competitive economy.
- 9.15 As set out in the NPPF, significant weight should be placed on the need to support economic growth, as the economic role forms one of three dimensions of sustainable development. In particular, it should also be noted that paragraph 81 of the NPPF stipulates that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.
- 9.16 It is considered that the economic benefits of the proposed development will ensure the development meets the requirements of the NPPF. Given the ongoing cost-of-living crisis, it is considered that the economic dimension of the development is particularly important, as the proposed development may help to offset the impacts of the economic downturn.
- 9.17 With the above in mind, it is considered that the proposed development is in line with the economic requirements of the NPPF; and will deliver significant benefit to the local community.

#### TRANSPORTATION AND HIGHWAYS

- 9.18 A Transport Assessment and Travel Plan has been prepared by Bryan G Hall and is submitted as part of this application.
- 9.19 The Transport Assessment concludes the following:
- The record of personal injury collisions occurring on the highway in the vicinity of the site has been analysed and it is considered that there are no highway layout characteristics which are adversely affecting road safety or likely to be exacerbated by the development traffic;
  - The development is considered to be well located to encourage journeys by all modes of sustainable transport.
  - The proposals include a car park with a total provision of 137 spaces.

Internally within the site, aisle widths and parking spaces have been designed in accordance with Lidl's own good practice guidance. The existing points of access to the site will be retained in their current form and the site has been designed to accommodate the required servicing and delivery movements for both the foodstore and the drive thru.

The development is expected to generate some 295 vehicle trips during the weekday evening peak period and some 468 vehicle trips during the Saturday midday peak period. Clearly, these vehicle trips are not all new to the network and will be either transferred from other competitor food retail offers, will be linked with other retail uses in the wider Monks Cross area or will be passing-by the site as part of another journey. However, and whilst it is acknowledged that it is a wholly unrealistic scenario to assess, to ensure a robust assessment of the impact of development traffic, all development trips have been considered to be new to the network in the operational assessments that have been undertaken.

Assessments have been undertaken of the operation of the priority-controlled T-junction with Monks Cross Drive and the Jockey Lane roundabout. The assessments have revealed that the junctions will continue to operate satisfactorily even following the addition of the development related trips with no discounting for transferred, linked or pass by trips.

- 9.20 In summary, the Transport Assessment has shown that the proposed development site will be accessible by all modes of transport, and that the local highway network will continue to operate satisfactorily following the introduction of the proposed development. It is therefore considered that there are no transport reasons why planning approval should be withheld.
- 9.21 A Travel Plan, prepared by Bryan G Hall, is also submitted as part of this planning application. This provides details of measures to encourage more sustainable travel to and from the site.
- 9.22 Given the above, it is considered that the proposed development is acceptable with respect to transport and highways; and is compliant with both City of York Draft Local Plan (April 2005) policies and policies of the emerging Local Plan and national planning policy.

#### FLOOD RISK AND DRAINAGE

- 9.23 A Flood Risk Assessment prepared by Toppings Engineers accompanies the planning application in support of the proposed foodstore.
- 9.24 The Flood Risk Assessment reviewed all sources of flood risk to both the proposed development and to existing adjacent developments as a result of the proposal, including fluvial, tidal, groundwater, sewers and flooding from artificial sources.
- 9.25 This report demonstrates that the proposed development is not at significant flood risk, and simple mitigation measures have been recommended to address any residual risks that may remain. The development could proceed without being subject to significant flood risk. Moreover, the development will not increase flood risk to the wider catchment area as a result of suitable management of surface water runoff discharging from the site.
- 9.26 Given the above summary, it is considered that the proposed development is acceptable in terms of flood risk and drainage.

#### NOISE

- 9.27 This application is supported by a Noise Impact Assessment, prepared by Environmental Noise Solutions Limited.
- 9.28 Noise monitoring was carried out during day and night-time periods from Wednesday 20th and Thursday 21st September 2023 to determine the existing background noise levels at the nearest noise sensitive receptors.



- 9.29 An assessment has been conducted considering the main noise sources from the development. The assessment found that noise levels associated with the operation of the units would not be considered to be of adverse impact. No mitigation has been proposed other than the defined noise limits for fixed plant in order to avoid adverse impact from services for day and night-time periods.
- 9.30 The assessment concludes that provided the recommendations contained within the noise impact assessment are implemented, noise is not considered to represent a constraint to the proposed development.
- 9.31 Based on the above, it is considered that the proposed development is acceptable from a n perspective.

#### AIR QUALITY

- 9.32 Wardell Armstrong have produced an updated Air Quality Assessment, which is submitted as part of this development.
- 9.33 The Air Quality Assessment has considered whether the proposed development could significantly change air quality during the construction phase and the suitability of the site for commercial use with regard to air quality.
- 9.34 The assessment predicts that the development will have a negligible impact on concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> at all four existing sensitive receptors considered in 2026. The effect of the proposed development on human receptors is therefore considered to be not significant.
- 9.35 The assessment has demonstrated that the proposed development will not lead to an unacceptable risk from air pollution, nor will it lead to any breach of national objectives as required by national policy. There are no material reasons in relation to air quality why the proposed scheme should not proceed.
- 9.36 Based on the above, it is considered that the proposed development is acceptable in air quality terms, complying with local and national planning policy.

#### TREES AND LANDSCAPING

- 9.37 An Arboricultural Report and Impact Assessment has been prepared by AWA Tree Consultants in support of the application. The report assesses the direct and indirect impacts of the proposed development and any associated operations.
- 9.38 A Landscape Details Plan has been prepared by FDA Landscape in support of the application. The proposed development has undergone a considered and detailed landscaping design in order to assist the development in assimilating into the surrounding area and to enhance the appearance and visual amenity of the site.
- 9.39 Overall, the proposed landscaping will represent a significant enhancement to the visual amenity of the location by providing improved landscaped areas across the site. The proposed landscaping forms an intrinsic element of the overall design of the development proposal and is of a high standard in line with the policy objectives. The landscaping approach is considered appropriate to the proposed use and character of the development.
- 9.40 Overall, it is considered that the proposed development accords with the Draft Local Plan, as well as national planning policy. As such, it is considered that the proposed development is acceptable in terms of trees and landscape.

#### ECOLOGY AND BIODIVERSITY

- 9.41 An Ecological Impact Assessment, prepared by Tyler Grange is submitted in support of the application.

9.42 The assessment has confirmed the site provides opportunity to incorporate appropriate measures to mitigate any potential impacts to ecological features and to demonstrate 'biodiversity net gain' in accordance with NPPF and local planning policy. As such, there are no ecological reasons why redevelopment of the site should not proceed.

9.43 Given the findings of the EcIA, it is considered that the proposed development is in line with City of York Draft Local Plan (April 2005) policies and policies of the emerging Local Plan and national planning policy regarding Ecology.

#### CONTAMINATION

9.44 A Geoenvironmental Appraisal, prepared by Sirius Geotechnical, is submitted in support of this planning application.

9.45 It is considered that the land is / can be made safe from a contamination and stability perspective. As such, it is not considered that the application should be refused on land condition grounds.

#### SUSTAINABILITY

9.46 Lidl undertakes a variety of sustainability measures as standard procedure in the operation of their stores. These measures minimise the environmental impact of the store and are set out within Section 5 of this Statement.

9.47 As set out, Lidl stores are designed, built and operated to industry leading standards and the company is constantly looking for new and creative ways of reducing energy consumption and emissions.

9.48 This planning application is supported by an Energy and Sustainability Statement, prepared by DDA.

9.49 In terms of 'passive' design strategies, the proposal ensures that natural daylighting is maximised which reduces dependency on electric lighting and the associated running costs and carbon emissions. The design of the building will also incorporate enhanced fabric efficiencies and thermal mass to facilitate stabilising any temperature fluctuations within the building thereby reducing heat gains and/or losses.

9.50 'Active' designs include the use of heat recovery ventilation to pre-heat incoming fresh air. Separating sub-metering allows all energy consumed to be monitored and any discrepancies to be easily identified and fixed. This further reduces wasted energy. Low energy lighting with suitable controls will be provided and the use of building energy management system to manage all systems effectively ensures that all efficiencies are achieved and maintained.

9.51 An Energy Statement is also submitted for the proposed drive through unit. In terms of 'passive' design strategies, the proposal ensures natural daylighting to reduce dependency on electric lighting, and the design of the building will also incorporate enhanced fabric efficiencies and thermal mass to facilitate stabilising any temperature fluctuations within the building thereby reducing heat gains and/or losses. 'Active' design strategies include separate sub-metering, low energy lighting, and high efficiency systems.

9.52 Based on the Energy and Sustainability Statements, it is clear that the proposed development will promote sustainability and should therefore be supported in this regard.

## 10 SUMMARY AND CONCLUSION

10.1 This Planning and Retail Statement has been prepared by Rapleys, on behalf of Lidl and is submitted in support of a planning application for the demolition of the existing building and erection of a new Lidl foodstore (Use Class E) and drive-through unit with associated car parking and landscaping at Unit 2, Monks Cross Drive, Huntington, York YO32 9GX.

10.2 This Statement has assessed the proposed development against the NPPF; and relevant policies contained within the City of York Draft Local Plan (April 2005) policies and policies of the emerging Local Plan and other relevant material considerations.

10.3 This planning application is being progressed further to Planning Permission Ref. 22/01135/FULM for the “erection of foodstore following part demolition of existing unit together with drive-thru restaurant both with associated access, parking and landscaping” being granted on 18 January 2023. Planning Permission Ref. 22/01135/FULM establishes the principle of a foodstore and a drive-through unit at the site. This consent remains extant.

10.4 It is concluded that the proposal is in accordance with national, local and neighbourhood planning policy; and there are no other material considerations that indicate outline planning consent should not be forthcoming. The development proposals constitute sustainable development for the following reasons:

The principle of redevelopment of a vacant and previously developed site is supported by local and national planning policy;

A sequential assessment has been undertaken as part of this application, this demonstrates that the site is sequentially preferable, and thus acceptable in retail policy terms;

The proposed development will deliver significant economic benefits to the area and offer new employment opportunities for local residents;

The development is accessible by sustainable transport means and will not result in any severe impact on the highway network or other elements of the transport network;

The site is not subject to any significant risk of flooding and appropriate drainage can be implemented on the site;

The indicative design, layout and landscaping of the scheme will create an attractive development, which is in keeping with the character of the surrounding area and promotes a good level of functionality;

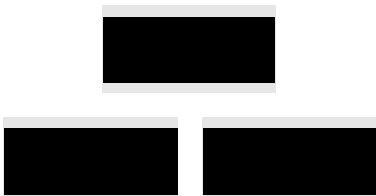
The development will not lead to any significant adverse impact on the amenity of neighbouring users; and

Appropriate tree planting and landscaping will be included as part of the development, this will result in a biodiversity net gain and create new habitats.

10.5 Overall, the proposed scheme adopts the principles of sustainable development, in relation to social, economic and environmental factors. The proposals accord with the emphasis of national policy contained within the NPPF, which confirms a presumption in favour of sustainable development.

10.6 In these terms, it has been demonstrated that the scheme complies with relevant policy as set out within the NPPF and the City of York Draft Local Plan (April 2005) policies and policies of the emerging Local Plan. Therefore, this outline planning application should be supported.

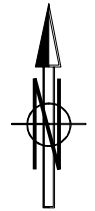
# Site Location Plan



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DO NOT SCALE!  
ALL DIMENSIONS SHOULD BE CHECKED ON SITE BEFORE WORK COMMENCES

SHOWN BOUNDARY AS PER TITLE NR NYK224283  
SUBJECT TO RECEIPT OF OFFICIAL TITLE DEEDS



Red Line  
Boundary -  
Title Deed Nr  
NYK224283

El Sub Sta

El Sub Sta

2

1

A	17.06.21	Internal alterations & External layout adjusted	BM
Rev.	Date	Description	Drawn

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client

Lidl GB Ltd



project

Monks Cross,  
York

drawing title

Location Plan

date September 2021

status Planning

scale 1:1250 @ A4

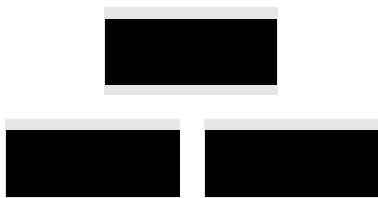
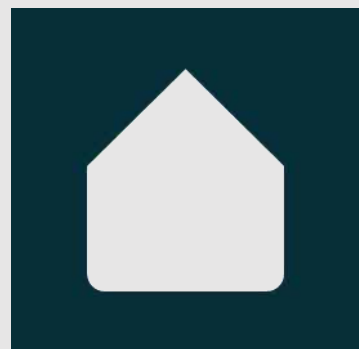
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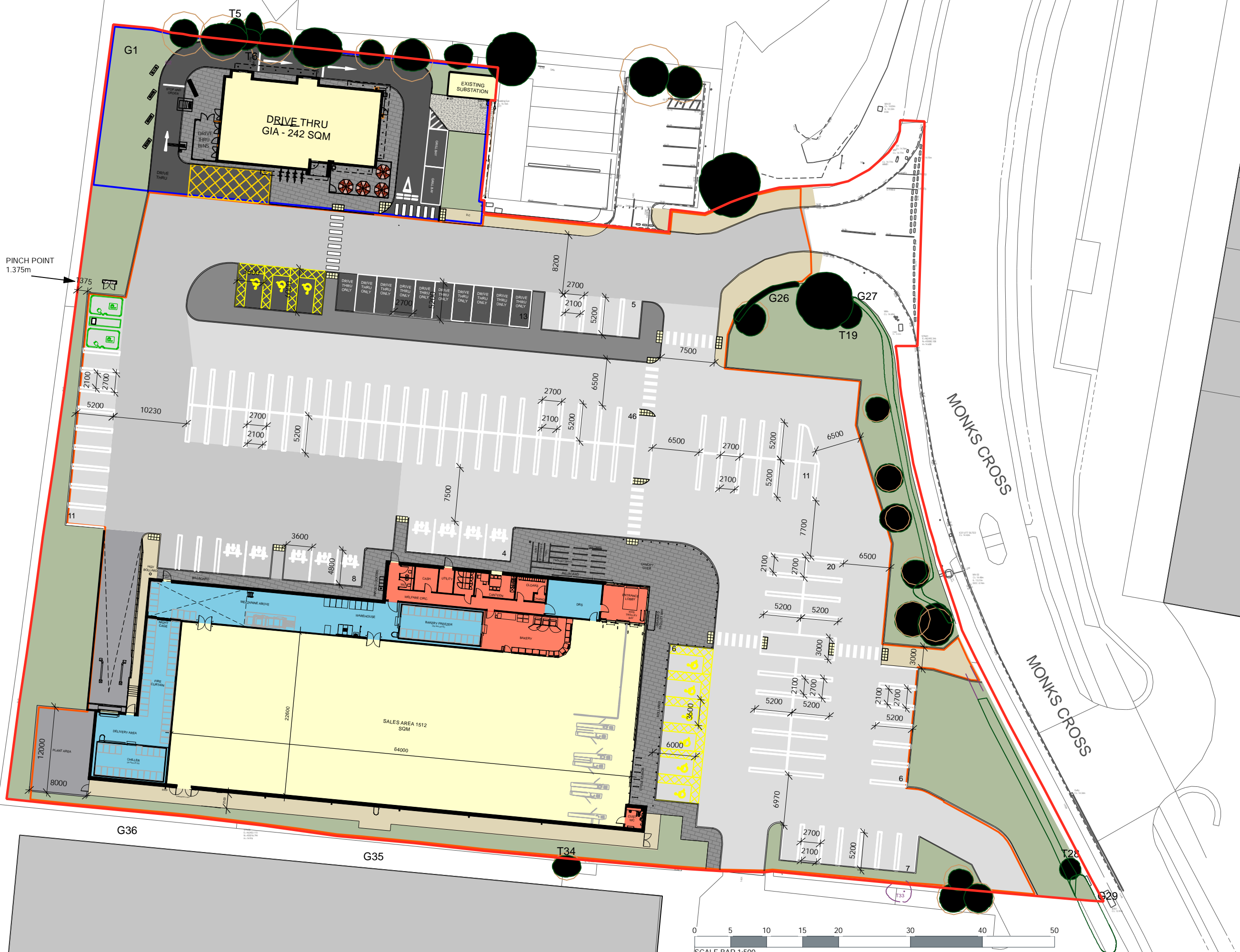
job no. 2504 dwg no. P411 Rev. /

Superstore

MONKSCROSS

# Proposed Site Layout Plan





**CAR PARK SCHEDULE**

TOTAL IN SITE	[137]
LIDL TOTAL	[124]
DISABLED	6
PARENT AND CHILD	9
STANDARD SPACES	107
EVC	2
DRIVE THRU UNIT TOTAL	[13]
DISABLED	3
STANDARD SPACES	10

**Site Area**

Site Area=	12,621m <sup>2</sup> /3.11 acres
------------	-------------------------------------

**Developable Areas**

Orange Area	9,785m <sup>2</sup> /2.42 acres
Blue Area	1,199m <sup>2</sup> /0.29 acres


**SCHEDULE OF AREAS (TYPE 1500):**

SALES	= 1512 m <sup>2</sup>
WAREHOUSE	= 447 m <sup>2</sup>
ANCILLARY	= 213 m <sup>2</sup>
GIA	= 2172 m <sup>2</sup>

C	03/11/2023	Annotation	Proposed Tree planting removed and added	BM
B	10/10/2023	Site entrance amended, car park adjusted following comments from Highways engineer		BM
A	25/09/2023	Adjusted parking layout to include pedestrian links		BM
[Rev]	Date	Description		Drawn

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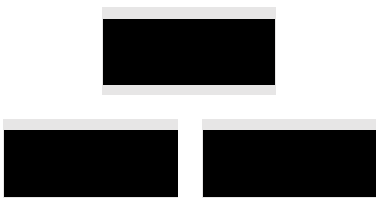
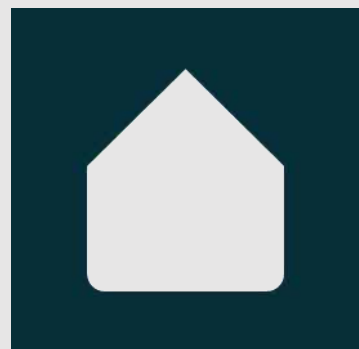
project  
**Monks Cross, York**

drawing title  
**Proposed Site Plan (Type 1500)**

date **August 2023**  
status **Planning**  
scale **1:500 @ A3**  
drawn **NG** checked **BM**  
job no. **2504** dwg no. **P432** rev. **C**



# Retail Impact Assessment Tables





**Table 1A - Benchmark Turnover - Permitted vs Proposed Foodstore**

	Permitted Store Net Sales Area (sq.m) (1)	Proposed Store Net Sales Area (sq.m) (2)	Difference (Uplift) in Sales Area (sq.m)	Benchmark Turnover (£/sq.m)	Permitted Store Sales 2022 (£m)	Permitted Store Sales 2026 (£m)	Proposed Store Sales 2022 (£m)	Proposed Store Sales 2026 (£m)	Difference (Uplift) in Sales 2022 (£m)	Difference (Uplift) in Sales 2026 (£m)
Convenience	1,165	1,210	45	£8,739	£10.18	£10.37	£10.57	£10.78	£0.39	£0.40
Comparison	291	302	11	£4,761	£1.39	£1.51	£1.44	£1.57	£0.05	£0.06
<b>Total</b>	<b>1,456</b>	<b>1,512</b>	<b>56</b>		<b>£11.57</b>	<b>£11.89</b>	<b>£12.01</b>	<b>£12.35</b>	<b>£0.45</b>	<b>£0.46</b>

**Assumptions Regarding Sales Density Growth R**

	2023	2024	2025	2026
Convenience Growth Rate (%)	1.6%	0.1%	0.1%	0.1%
Comparison Growth Rate (%)	2.3%	2.2%	2.2%	2.2%

**Notes**

Benchmark Turnover - Sourced from GlobalData (December 2021).

Adjusted for Density Growth - Experian Retail Planner Briefing Note 19 (January 2022) - Figure 4a & 4b

Assessment years: Base year - 2022. Design year - 2026

Sales info based on DPP Sequential & Retail Impact Assessment dated May 2022, submitted under planning application 22/01135/FULM.

(1) Planning Application 22/01135/FULM

(2) Net Sales taken from Proposed Site Plan Drawing

**Table 1B - Indicative Benchmark Turnover - Permitted vs Proposed Drive-Thru**

	Permitted Drive-Thru	Proposed Drive-Thru	Difference (sq.m / £r)
2022 Sales (£m)	£0.59	£0.85	£0.26
2026 Sales (£m)	£0.64	£0.92	£0.28

**Notes**

Net sales area assumed to be 70% of Gross Internal Area (GIA) Permitted GIA 168sq.m. Proposed GIA 242sq.m

Assumed sales density of £5,000 per sq.m

2% per annum growth between 2022 - 2026

**Table 1C - Indicative Benchmark Turnover - Existing TK Maxx Unit Trading as a Foodstore**

	Net Sales Area (sq.m)	Benchmark Turnover (£/sq.m)	Store Sales 2022 (£m)	Store Sales 2026 (£m)
Convenience	1,509	£8,739	£13.19	£13.44
Comparison	377	£4,761	£1.79	£1.96
<b>Total</b>	<b>1,886</b>		<b>£14.98</b>	<b>£15.40</b>

**Notes**

Under application 18/02442/CLU up to 2,694sq.m can be used open Class E (retail) sales.

Figures assumes 70% of Gross Internal Area (GIA) will be net sales floorspace. Net sales split 80/20% between convenience & comparison goods sales

Lidl sales densities applied.

Table 2a: Population

	2020	2021	2022	2023	2024	2025	2026
Zone 1	47,734	47,865	48,041	48,244	48,474	48,778	49,101
Zone 2	74,940	74,779	74,701	74,689	74,736	74,778	74,781
Zone 3	87,070	86,858	86,866	86,946	87,502	87,194	87,388
<b>Total</b>	<b>209,744</b>	<b>209,502</b>	<b>209,608</b>	<b>209,879</b>	<b>210,712</b>	<b>210,750</b>	<b>211,270</b>

Table 2b: Convenience Expenditure Per Capita

	2020	2021	2022	2023	2024	2025	2026
<b>Zone 1</b>							
Expenditure (£) (with SFT)	£2,538	£2,421	£2,387	£2,383	£2,378	£2,375	£2,373
Expenditure (£) (minus SFT)	£2,401	£2,269	£2,251	£2,240	£2,228	£2,221	£2,214
SFT Expenditure (£)	£137	£152	£136	£143	£150	£154	£159
<b>Zone 2</b>							
Expenditure (£) (with SFT)	£2,751	£2,624	£2,588	£2,583	£2,577	£2,575	£2,572
Expenditure (£) (minus SFT)	£2,602	£2,459	£2,440	£2,428	£2,415	£2,407	£2,400
SFT Expenditure (£)	£149	£165	£148	£155	£162	£168	£172
<b>Zone 3</b>							
Expenditure (£) (with SFT)	£2,663	£2,541	£2,505	£2,500	£2,495	£2,492	£2,490
Expenditure (£) (minus SFT)	£2,519	£2,380	£2,362	£2,350	£2,338	£2,330	£2,323
SFT Expenditure (£)	£144	£161	£143	£150	£157	£162	£167

Table 2c: Comparison Expenditure Per Capita

	2020	2021	2022	2023	2024	2025	2026
<b>Zone 1</b>							
Expenditure (£) (with SFT)	£3,662	£3,680	£3,897	£3,968	£4,039	£4,116	£4,198
Expenditure (£) (minus SFT)	£2,725	£2,701	£2,966	£2,988	£3,013	£3,042	£3,077
SFT Expenditure (£)	£937	£979	£931	£980	£1,026	£1,074	£1,121
<b>Zone 2</b>							
Expenditure (£) (with SFT)	£3,940	£3,960	£4,193	£4,269	£4,346	£4,428	£4,517
Expenditure (£) (minus SFT)	£2,931	£2,906	£3,191	£3,214	£3,242	£3,272	£3,311
SFT Expenditure (£)	£1,009	£1,054	£1,002	£1,055	£1,104	£1,156	£1,206
<b>Zone 3</b>							
Expenditure (£) (with SFT)	£3,842	£3,861	£4,089	£4,163	£4,238	£4,318	£4,404
Expenditure (£) (minus SFT)	£2,858	£2,834	£3,112	£3,134	£3,161	£3,191	£3,228
SFT Expenditure (£)	£984	£1,027	£977	£1,029	£1,077	£1,127	£1,176

## Notes

Population &amp; Sales info based on DPP Sequential &amp; Retail Impact Assessment dated May 2022, submitted under planning application 22/01135/FUL

Table 3a: Total Available Convenience Goods Expenditure - excluding SFT

	2020	2021	2022	2023	2024	2025	2026
Zone 1	£114.61	£108.59	£108.15	£108.05	£108.00	£108.34	£108.71
Zone 2	£195.03	£183.89	£182.29	£181.31	£180.49	£180.02	£179.47
Zone 3	£219.35	£206.76	£205.19	£204.32	£203.51	£203.20	£203.01
<b>Total</b>	<b>£528.98</b>	<b>£499.24</b>	<b>£495.63</b>	<b>£493.68</b>	<b>£491.99</b>	<b>£491.56</b>	<b>£491.19</b>

Table 3b: Total Available Comparison Goods Expenditure - excluding !

	2020	2021	2022	2023	2024	2025	2026
Zone 1	£130.05	£129.30	£142.49	£144.13	£146.06	£148.36	£151.09
Zone 2	£219.68	£217.34	£238.38	£240.08	£242.28	£244.71	£247.58
Zone 3	£248.89	£246.17	£270.30	£272.53	£275.19	£278.24	£282.13
<b>Total</b>	<b>£598.61</b>	<b>£592.81</b>	<b>£651.17</b>	<b>£656.74</b>	<b>£663.53</b>	<b>£671.31</b>	<b>£680.80</b>

**Notes**

Expenditure info based on DPP Sequential &amp; Retail Impact Assessment dated May 2022, submitted under planning application 22/01135/FULM.

Rounded +/-

Table 4: Proposed Convenience Trade Draw - Permitted & Proposed Developments

	% Draw from Zone (1)	Permitted Foodstore (2)		Proposed Foodstore (2)		Difference (£m)	
		£10.18	£10.37	£10.57	£10.78	2022 Diversion (£m)	2026 Diversion (£m)
		2022 Diversion (£m)	2026 Diversion (£m)	2022 Diversion (£m)	2026 Diversion (£m)		
Zone 1	25%	£2.55	£2.59	£2.64	£2.69	£0.10	£0.10
Zone 2	15%	£1.53	£1.56	£1.59	£1.62	£0.06	£0.06
Zone 3	50%	£5.09	£5.19	£5.29	£5.39	£0.20	£0.20
Beyond	10%	£1.02	£1.04	£1.06	£1.08	£0.04	£0.04
<b>Total</b>	<b>100%</b>	<b>£10.18</b>	<b>£10.37</b>	<b>£10.57</b>	<b>£10.78</b>	<b>£0.39</b>	<b>£0.40</b>

Notes

(1) Sourced from Table 7, Appendix 1 from DPP Sequential & Retail Impact Assessment dated May 2022, submitted under planning application 22/01135/FULM.

(2) Turnovers taken from Table 1.

Rounded +/-

Table 5: Base Position - Household Survey Derived Turnovers

Location	Convenience Goods (£m)	Convenience Goods (£m)
<b>Zone 1</b>	<b>2022</b>	<b>2026</b>
York City Centre		
Marks & Spencer, York City Centre, York	£9.20	£9.37
Tesco Express, Low Ousegate, York		
Tesco Express, Picadily, York	£0.94	£0.96
Tesco Express, Goodramgate, York	£0.23	£0.24
Sainsburys Local, Davygate, York (2)	£3.45	£3.52
Sainsburys Local, Picadily, York		
Co-op, The Stonebow, York		
Londis, BlakeStreet, York		
One Stop, Walmgate, York		
Other Convenience		
Other Comparison		
<b>Total</b>	<b>£13.82</b>	<b>£14.09</b>
Foss Island Retail Park		
Asda, Layerthorpe, York	£4.60	£4.69
Morrisons, Foss Island Retail Park, York	£25.09	£25.57
Sainsburys, Fossbank, York	£12.18	£12.41
Waitrose, Foss Islands Road, York	£5.40	£5.50
Other Comparison		
<b>Total</b>	<b>£47.27</b>	<b>£48.17</b>
Out of Centre		
Aldi, Fulford Road, York	£14.30	£14.57
Iceland, Fulford Road, York	£1.96	£1.99
Lidl, James Street, York	£2.79	£2.84
Co-op, Hull Road, York	£3.12	£3.18
Co-op, Broadway, Fulford, York	£3.69	£3.76
Co-op, Paragon Street, York	£0.37	£0.38
Co-op, Tang Hall Lane, Layerthorpe, York (2)	£2.76	£2.81
Costcutter, York Street, York	£4.39	£4.47
Costcutter, Bishopthorpe Road, York	£0.32	£0.32
Nisa Local, University of York		
One Stop, Heslington Road, York		
Sainsburys Local, Bootham, York	£1.81	£1.85
Sainsburys Local, Farndale Avenue, York	£1.97	£2.01
Sainsburys Local, Fulford Road, York	£1.18	£1.20
Sainsburys Local, Micklegate, York	£1.02	£1.04
Spar, 17 Bridge Street, York (2)	£1.34	£1.37
Spar, Hull Road, York		
<b>Total</b>	<b>£41.02</b>	<b>£41.80</b>
<b>Zone 1 Overall Total</b>	<b>£102.11</b>	<b>£104.06</b>

Zone 2		
Acomb District Centre		
Morrisons, Front Street, Acomb, York	£53.67	£54.69
Co-op, Regent Buildings, York Road, York	£1.11	£1.13
Farmfoods, Front Street, Acomb, York	£2.86	£2.92
Other Comparison		
<b>Total</b>	<b>£57.64</b>	<b>£58.74</b>
Out of Centre		
Tesco Extra, Tadcaster Road, Askham Bar Centre, York	£36.85	£37.55
Co-op, Texaco Petrol Station, Boroughbridge Road, York	£0.67	£0.68
Co-op, Beagle Ridge Drive, Foxwood, York	£0.57	£0.58
Co-op, Beckfield Lane, Acomb, York	£8.66	£8.82
Co-op, Church Street, Copmanthorpe, York		
Co-op, Great North Way, Nether Poppleton, York	£0.87	£0.89
Co-op, Bishopthorpe, York	£0.78	£0.79
Co-op, The Green, Upper Poppleton, York	£2.52	£2.57
Costcutter, Bramham Road, Acomb, York	£2.54	£2.59
Costcutter, Dringhouses, York		
M&S Simply Food, Tadcaster Road, York		
McColls, Hamilton Drive, Acomb		
McColls, Moorcroft Road, Woodthorpe		
McColls, Gale Lane, York	£0.85	£0.86
One Stop, Acomb Road, Holgate, York	£0.19	£0.19
Sainsburys Local, Blossom Street, York	£2.36	£2.41
Sainsburys Local, Scarcroft Road, York	£1.43	£1.45
Tesco Express, Acomb Wood, York	£5.72	£5.82
York Designer Outlet		
M&S Designer Outlet		
Lidl, Tharnet Road, York	£19.56	£19.93
<b>Total</b>	<b>£83.55</b>	<b>£85.15</b>
<b>Zone 2 Overall Total</b>	<b>£141.20</b>	<b>£143.89</b>
Zone 3		
Haxby District Centre		
Co-op, The Village, Haxby	£4.39	£4.48
Sainsburys, The Village, Haxby	£8.49	£8.65
Martins		
Other Convenience	£1.32	£1.35
Other Comparison		
<b>Total</b>	<b>£14.21</b>	<b>£14.48</b>
Clifton Road Local Centre		
Spar, Clifton Green, Clifton, York	£0.68	£0.70
Other Convenience	£1.14	£1.14
<b>Total</b>	<b>£1.82</b>	<b>£1.84</b>
Strensall Local Centre		
Tesco Express, The Village, Strensall	£3.83	£3.90
Other Convenience	£0.64	£0.64
<b>Total</b>	<b>£4.47</b>	<b>£4.55</b>

Monks Cross Retail Park		
Aldi, Kathryn Avenue, Monks Cross Retail Park, York	£17.58	£17.92
Asda, Jockey Lane, Monks Cross	£43.33	£44.16
Sainsburys	£34.60	£35.26
Marks and Spencer Simply Food, Monks Cross	£8.14	£8.29
Other Convenience		
Other Comparison		
<b>Total</b>	<b>£103.66</b>	<b>£105.63</b>
Clifton Moor Retail Park		
Tesco Extra, Stirling Road, Clifton Moor Centre, York	£34.88	£35.55
Iceland, Clifton Moor		
Farmfoods, Tower Court, Clifton Moor, York		
Other Comparison		
<b>Total</b>	<b>£34.88</b>	<b>£35.55</b>
Out of Centre		
Aldi, Water Lane, York	£23.97	£24.43
Co-op, Clarence Street, York	£1.03	£1.05
Co-op, East Parade, Heworth, York	£3.55	£3.62
Costcutter, Barley Rise, Strensall, York	£0.64	£0.65
Costcutter, Heworth, York	£0.82	£0.83
Sainsburys Local, Burton Stone Lane, Clifton, York	£1.01	£1.03
Spar, Brockfield Park Drive, Huntington, York	£2.38	£2.43
Spar, Lowther Street, York		
Spar, Bad Bargain Lane, Heworth, York	£1.75	£1.78
Tesco Express, Huntington Road, York	£0.89	£0.90
One Stop, Fourth Avenue, Tang Hall, York	£0.82	£0.83
<b>Total</b>	<b>£36.86</b>	<b>£37.57</b>
<b>Zone 3 Overall Total</b>	<b>£71.47</b>	<b>£72.83</b>

**Notes**

Convenience turnover taken from Table 6, Appendix 1 DPP Sequential & Retail Impact Assessment dated May 2022 and Updated Note dated 24th Nover 2022, submitted under planning application 22/01135/FULM.

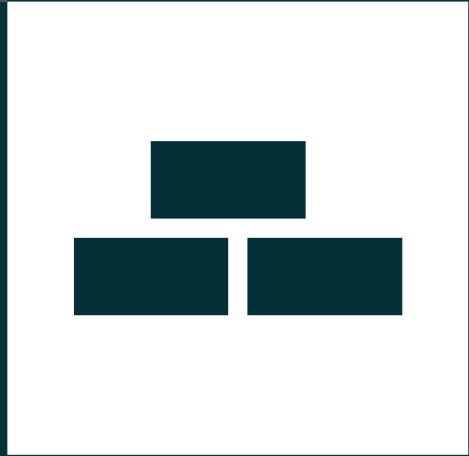
Blank spaces equate to no results.

(1) 2026 figure not provided by DPP. 1.001 growth rate applied to 2022 data As advised by DPP 24th November 2022).

(2) Benchmarked Turnover used. Benchmarked Turnover taken from DPP Updated Retail Note dated 24th November 2022







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