



PLANNING

PLANNING STATEMENT

LIDL UK GMBH

LAND AT LORD'S HILL, COLEFORD

A photograph of a LIDL store facade with a large circular logo. The logo features the word 'LIDL' in a bold, black, sans-serif font. The background of the logo is white, and it is set against a dark frame. The entire image has a teal color overlay. Numerous silver balloons are visible in the sky above the building.

LIDL

PLANNING STATEMENT

On behalf of: **Lidl UK GmbH**

In respect of: **Land at Lord's Hill, Coleford**

Date: **October 2018**

Reference:

Author: **AS/OR**

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1.0 Introduction

1.1 This Planning Statement has been prepared by DPP Planning in support of a planning application, submitted on behalf of Lidl UK GmbH, in relation to the following development proposal:

“Proposed construction of a Class A1 food store with associated car parking, amendments to the access with Old Station Way, servicing, landscaping and associated works on land off Lord’s Hill / Pyart Court, Coleford.”

1.2 This Statement outlines the context within which the application is made and provides a detailed examination of the main planning considerations raised by the proposals, together with reasoned justification in support of the proposed development, and outlines the benefits that would arise from the proposed scheme.

1.3 This statement is structured as follows:

- Section 2 provides a description of the characteristics of the site and surrounding area, and details regarding the planning history associated with the site;
- Section 3 provides details of the development proposals;
- Section 4 outlines the relevant planning policy framework in relation to the site and the development;
- Section 5 assesses the proposals in terms of the planning considerations;
- Section 6 sets out our conclusions.

CHAPTER 2

APPLICATION SITE AND CONTEXT



2.0 Application Site and Context

2.1 This section outlines the site's context relevant to the consideration of this application both in physical terms but also its planning history.

The Site

2.2 The site is located within Coleford Town Centre as defined by the adopted Forest of Dean Core Strategy (February 2012) and Coleford Neighbourhood Plan (October 2018) – this is a principal town centre within the Forest of Dean Local Authority. The site is allocated for Class A1 retail use as outlined by Policy AP55 from the allocations plan adopted in June 2018, and which is also replicated within the Neighbourhood Plan.

2.3 The application site comprises part vacant residential curtilage and a cleared site, which adjoins the Pyart Court Shopping Centre site. The total site area is 1.5 acres.

2.4 The site is bound to the south by an existing Co-op store and Pyart Court, to the north and east by Lord's Hill and Old Station Way, and finally to the west by a car park.

2.5 Further detailed discussion of the site's characteristics is included in the submitted Design and Access Statement.

Planning History

2.6 The site and immediate surrounds benefit from a significant history of retail planning permissions dating back to the 1980's, these include:

- Permission was granted in outline for retail development on 2.5 acres, residential development on 2 acres and associated car parking. (Planning Reference: DF1092/V);
- Planning permission granted in 1987 for a shopping development and site works at Pyart Court (Planning Reference: DF1092/ V/AP);
- Planning permission was granted in early 2011 for the alterations and extension to the front of existing Co-operative Supermarket, and re-cladding of the existing structure. (Planning Reference: P2239/10/ FUL);
- There are also several applications related to Pyart Court by past and present owner/occupiers.

2.7 Notwithstanding the above, the most significant to the consideration of this application, in March 2012, permission was granted at appeal for the erection of a Class A1 convenience retail store and 5 retail units, and associated works (demolition of existing retail units, 1, 25, 26 and 27) under reference: P1075/11/FUL. Further discussion of the main considerations arising from this permission, and how they relate to this current proposal, is made later in the Statement, however, a summary of the main points are outlined below:

- Application originally refused on design grounds and its effect on the character and appearance of the area;
- The principle of a supermarket on the site is acceptable given its location within a Town Centre;
- Store would be a respectful addition to the streetscene;
- Mono-pitch roof is ideal given the site topography;
- Use of brick is acceptable;
- Contemporary design would not be out of place within this part of the Town Centre;
- No adverse impact on the buildings within the Conservation Area – or any other heritage assets in the locality;
- Results in an overall positive addition to this town centre site – improving its appearance and that of the immediate surroundings.

2.8 A copy of the appeal decision is provided in Appendix 1.

CHAPTER 3

APPLICATION PROPOSALS



3.0 Application Proposals

Retail Format

- 3.1 Lidl opened its first store in Germany in 1973 and expanded into the UK in the 1990's. It now has over 620 stores in Britain. It operates at the discount end of the convenience food market and offers top quality products at the lowest prices. It achieves this by utilising small suppliers to provide 'own brand' products rather than stocking mainly household names. Costs are also kept down by stocking fewer lines; a typical Lidl store stocks about 1400 lines compared to 10-15,000 in main food stores such as Tesco or Asda.
- 3.2 Nevertheless, the Lidl store would stock a good selection of fresh and frozen food as well as an in-store bakery. A small section of comparison goods is also stocked although the way in which these are sourced means that there is little consistency in the products that are on sale at any one time. In this respect, comparison buys within a Lidl are very much 'impulse' buys rather than the store becoming a destination for non-food items in its own right.

Pre-Application Discussions

- 3.3 Lidl undertook pre-application discussions with the Council earlier this year. A written response was received by Lidl on the 1st June 2018. The main points to arise from this response are as follows:
- Design – acceptance of a corporate standard is accepted given it has similar appearance to the fall-back position. Mr Pope requested that the proposed materials reflect the local vernacular.
 - Landscape and Sustainability – Council's Landscape Officer suggested some planting to assist in strengthening 'green links'. BREEAM 'Very Good' is required. No need for a LVIA.
 - Highways / Pedestrian Links – Need for Transport Assessment and accompanying Travel Plan, however, main request is for pedestrian linkages through to the Town Centre.

Coleford Proposal

- 3.4 The application proposals have been informed by Lidl's assessment of the retail needs of Coleford and by the pre-application discussions had with the LPA. These have subsequently been tested at a community/stakeholder consultation held on the 4th October 2018, which confirmed that there was overwhelming support and need to improve the range of retail provision within Coleford, with those attending identifying high prices and lack of competition and/or range of options as leading them to shop outside of Coleford.
- 3.5 To address the opportunities identified above for the development of Class A1 food store operated by Lidl, the development proposes the following:

- Erection of a Class A1 Food store extending to 1,815 sqm gross internal area, with a net sales area of 1,129 sqm;
- Car Parking (76 spaces in total, 5 of which disabled and 8 parent and child spaces);
- Cycle Stands;
- Landscaping;
- Access improvements off Old Station Way into the site;
- Provision of pedestrian linkages through the site to the Town Centre;
- Further pedestrian linkages to the site off Lord's Hill;
- Plant;
- Associated Ancillary Works.

3.6 The proposed development would provide an additional retail option for residents to complement others within the Town Centre. It was evident from the consultation event that local residents are frustrated by the lack of a range and choice of stores to undertake their weekly shopping within Coleford. A significant number of those attending the event commented that they travelled outside of Coleford – either to Monmouth or Cinderford to do their shopping and would only use Coleford as their 'top-up'. Accordingly, the provision of such a store within the Town Centre of Coleford would remove the need to travel to other locations, to the benefit of both the local residents and the Town Centre.

3.7 In addition, a connecting route between the proposed store and the existing retail uses in the town centre is proposed – this is to ensure the vitality of the town centre is maintained by providing a convenient route for customers. The existing pedestrian links to the site will also remain for the same reason.

3.8 Vehicular access will also be improved through the widening of the junction and the provision of two exit lanes, allowing simultaneous left and right vehicular exit movements from the site.

3.9 The car park will function as a town centre car park, facilitating shopping trips to the development and the remainder of the town centre.

Summary

3.10 It is evident, therefore, that the proposed development would bring the following benefits:

- Development of an area which currently remains unused – detracting from the character and appearance of the area;
- A purpose-built food store which meets the customer needs by providing range and choice to local residents;
- Employment opportunities including up to 40 new retail jobs for new residents;
- Facilitated connection between the proposed unit and the rest of the town centre to maintain the vitality of the town centres and attract users from further areas into Coleford;
- Improved shopping choice through the provision of a new mainstream discount operator for Coleford and the surrounding area;

- Improved access off Old Station Way; and
- Provision of parking facilities.

CHAPTER 4

PLANNING POLICY CONTEXT



4.0 Planning Policy Context

- 4.1 This section summarises the planning context of the proposed development – both in respect of national planning policy in the form of the NPPF and local planning policy.

National Planning Policy

- 4.2 The national tier of planning policy is set out within the National Planning Policy Framework (2018) (NPPF).

The Presumption in Favour of Sustainable Development

- 4.3 At the heart of the NPPF is a presumption in favour of sustainable development, which in the context of this application proposals means the determination and approval of proposals that accord with an up-to-date development plan without delay (para.11 of the NPPF 2018).

Building a Strong and Competitive Economy

- 4.4 Paragraph 80 confirms that the Government is committed to ensuring that the planning system does not act as an impediment towards sustainable economic development. Significant weight should therefore be placed upon the need to support economic growth through the planning system

Ensuring Vitality of Town Centres

- 4.5 The NPPF advises that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.
- 4.6 In these terms, Local Planning Authorities should seek to define a network and hierarchy of centres and promote their long-term vitality and viability - by allowing them to grow and diversify.
- 4.7 Furthermore, Local Planning Authorities should promote competitive local centre environments that provide customer choice and a range of permitted uses, whilst also recognising that residential development can play an important role in ensuring the vitality of centres.

Decision Taking

- 4.8 The NPPF (paragraph 38) confirms that Local Planning Authorities should approach decision-taking in a positive way to foster the delivery of sustainable development. Local planning authorities should look for solutions rather than problems, work proactively with applicants to secure developments that will improve the economic conditions, and decision-takers should seek to approve applications for sustainable development where possible.
- 4.9 Paragraph 41 of the NPPF confirms that the more issues that can be resolved at preapplication stage, the greater the benefits.

Local Planning Context

4.10 The current Local Plan consists of the following documents:

- Forest of Dean District Core Strategy - February 2012;
- The Allocations Plan - June 2018;
- Coleford Neighbourhood Plan – October 2018.

4.11 A review of these documents confirms that the site is:

- Within the Coleford Settlement Boundary;
- Within the Coleford Town Centre Boundary (Policy AP55);
- Is a designated retail use allocation (Policy AP55).

4.12 In light of the above and the proposed development, the following policies are considered relevant:

Forest of Dean District Core Strategy

4.13 Core Policy CSP.1, Design and Environmental Protection: This policy states that ‘the design and construction of new development must consider important characteristics of the environment and conserve, preserve or otherwise respect them in a manner that maintains or enhances their contribution to the environment, including their wider context.’

4.14 Core Policy CSP.1’s supporting paragraph 6.2 states that ‘all new development should make a positive contribution to an area by way of its design. It should be compatible with its surroundings and in achieving this may blend in with them, provide mitigation by way of landscaping or may provide a distinct feature’.

4.15 Core Policy CSP.1’s supporting paragraph 6.3 states that ‘the means of travel to and from a development, and the infrastructure it needs have a direct bearing on the quality of the environment and will be considered as part of any proposals’.

4.16 Core Policy CSP.4 Development Principles, Development at Settlements: The strategic objective of this policy is to promote thriving sustainable communities and facilitate regeneration. This states that ‘development and the provision of services will be supported where it leads to the maintenance and enhancement of the functions of the towns and larger villages. Within town centres, new development will be encouraged that reinforces the role of the towns and provides a more diverse and better-quality service or retail offer.’

4.17 Core Policy CSP.4’s supporting paragraph 6.21 aims to ‘reinforce the economic and social networks especially in the south forest and improve each town’s self-containment while developing them in a complementary rather than competitive manner’.

4.18 Core Policy CSP.4’s supporting paragraph 6.24 states that ‘the use of greenfield land can be minimised first using previously developed land where possible and then by careful selection of

location'. This section continues to state that 'all development should make good use of resources and should be designed so as not to lead to waste during construction of use.'

- 4.19 *Policy CSP.7 Economy*: This policy states that 'economic development will be promoted throughout the district in accordance with the spatial strategy and its allocations. This will encourage new and more diverse types of employment and supporting infrastructure to be established by making land and premises available. The location of new development must be justifiable in terms of the settlement hierarchy and policy CSP4.'
- 4.20 *Core Policy CSP.7's* supporting paragraph 6.45 states that 'redevelopment and improvement of existing space and sites it essential and will be supported' as well as emphasising the 'fundamental need to improve the range and quality of employment on offer'.
- 4.21 *Core Policy CSP.7 's* supporting paragraph 6.52 states that 'new service and other mixed development will also be welcomed where it does not detract from the primary function of the centres concerned. A greater range or mix of development in town centres will further encourage activity and can make them more attractive for tourists or recreational visits'.
- 4.22 Finally, the Settlement Policy for Coleford emphasises the link between developing retail space to 'provide greater range in the centre and retain / clawback some lost trade from centres such as Monmouth.' Furthermore it identifies the need for up to approximately 1200sqm of convenience retail within the Town.

Allocations Plan (2018)

- 4.23 The allocations plan reflects the aims of the Strategy by identifying the need to improve the range and offer in the Town Centre through the development of land identified in the Local Plan.
- 4.24 In the 'Summary of Key Issues' (for Coleford) it also identifies the need to promote development in Coleford and to retain its role as one of the four towns serving the Forest of Dean, with an emphasis on service provision. In addition, it outlines the need to provide better road, pedestrian and cycle access both to, and within, Coleford.
- 4.25 Policy AP55 deals specifically with the Town Centre and again identifies this land for retail use, indicating that it ought to be developed as approved, or in a similar manner to that approved – providing a well-integrated scheme which provides suitable access, design and visual connections.
- 4.26 Policy AP4 – Design of Development seeks to ensure that development proposals make a positive contribution to the design quality of the area – taking into account a number of factors, including sense of place, character of the area, environmental enhancement, adopting an inclusive approach to produce safe and accessible environments.
- 4.27 Policy AP7 deals with biodiversity and seeks to protect the biodiversity of a site, and where possible make enhancements to safeguard those features unless it can be demonstrated that it is not possible.

Coleford Neighbourhood Plan

- 4.28 Policy CTC1: Site Allocations in the Town Centre: is the main policy relating to the development of this site. This policy states that proposals on the site will be supported when they are consistent with the following development principles.

This site has permission for a retail convenience store to improve the range of existing town centre provision. The site is identified as site 4 on Map 5. Should this permission be replaced then the site should remain as town-centre use, and include: -

- *Substantial retail use with some possible mixed use. Any mixed use which includes artisan centre, soft landscaping and/or green space will be particularly supported;*
 - *Two storey design in keeping with the character assessment;*
 - *Careful planning of access and possible alteration of the Lords Hill/Old Station Way junction to mitigate traffic congestion;*
 - *Parking suitable to its use and good pedestrian access links to the Market Place, Pyart Court.*
- 4.29 Other policies within the Plan provide some additional context to the consideration of the proposal. These include:
- 4.30 Policy CTC4 Supporting Town Centre Retail and Service Provision deals with proposals for retail and service facilities that enhance the vitality and viability of the Centre subject to criteria relating to the goods and services being complimentary to the existing offer, design, ground floor / first floor uses.
- 4.31 Policy CTC3 Enhancing Coleford Town Centre seeks to ensure that development proposals bring public realm enhancements, including through improved accessibility and landscaping.
- 4.32 Policy CITPA1 Transport and Movement supports development proposals that can be satisfactorily incorporated into the existing highway network.

Policy Summary

- 4.33 The above discussion of the policy context of the proposed development confirms that the site is appropriate for retail development given its location within the settlement boundary for Coleford, but more significantly, the main Town Centre. It establishes that the site benefits from an implemented permission for retail development and identifies that any different scheme on the site should follow similar principles.
- 4.34 In terms of design, it identifies the need to relate to the local context and encourage good linkages into the Town Centre.
- 4.35 The highway policies again seek to ensure that any new development can be accommodated within the surrounding highway network without causing severe impacts.

4.36 All of the above considerations identified within the policy context will be discussed in greater detail in the following chapter.

CHAPTER 5

PLANNING ASSESSMENT



5.0 Planning Assessment

5.1 In light of the policies summarised within the previous chapter, the main issues for consideration are considered to be:

- Principle of the Development – including economic development and vitality and viability of the Centre;
- Design and Heritage;
- Highways and Accessibility;
- Ecology;
- Drainage;
- Other material considerations (including Community Involvement, Economic Benefits, Noise, and Trees).

Principle of Development

5.2 The application site falls within Coleford's Town Centre – this is a favoured location for retail development as confirmed in the Core Strategy (adopted June 2012). Furthermore, policy CSP.14 identifies the need for an additional retailing provision, including approximately 1,200sqm of convenience goods retailing. The supporting text for the policy identifies in para.7.40 that Coleford currently suffers from trade leakage.

5.3 The site is also allocated for Class A1 Retail Use as confirmed by the Allocations Plan adopted in June 2018. Policy AP55 specifically deals with the allocation stating:

“The site for the recently commenced convenience store off Lords Hill as shown on the policies map is identified for retail use, to be developed as permitted or in a similar manner (retail unit or units and associated parking and circulation space). New development should be well integrated into the remainder of the centre with suitable access, design and visual connections”

5.4 This policy further establishes that the site is appropriate for retail development and identifies that the site benefits from an extant planning permission which could be developed without the need for any further planning related permissions to be in place. This is a significant material consideration in the determination of the application – particularly in terms of the principle of the use on the site.

5.5 Furthermore, the very recently adopted Coleford Neighbourhood Plan allocates the site for convenience food retail purposes – Policy CTC1. The policy further identifies that the site benefits from a permission for convenience retail and should be developed to improve the range of existing town centre provision.

5.6 The allocation of the site for retail purposes under three different policies/plans, provides clear evidence of the acceptability of the principle of the use on this site. In addition, however, and as highlighted the policy text, the site benefits from an extant consent for retail development. As such, the principle of development has been tested and accepted through the previous application. The

“fall-back position” of the implementation of the extant consent is an important material consideration in the determination of this application and means that the principle of development should not be in question.

- 5.7 In addition to the planning policy and planning history at the site confirming the appropriateness of the application proposals, prior to the submission of this application Lidl hosted a public exhibition to present the proposed plans to members of the Public, Local Members, and the Town Council. The full result and discussion of the feedback received as part of this event is outlined within the accompanying Statement of Community Involvement, however, the principle of development was almost unanimously supported.
- 5.8 The overwhelming consensus from those that attended the event was that the current offer within Coleford was limited, and that they travel to neighbouring towns to undertake their main food shopping. A significant majority of those that left Coleford to undertake their shopping would either visit Monmouth or Cinderford – both of which are similar distance from Coleford. Whilst Cinderford is located within Forest of Dean area, the result of these trips is that a significant amount of spending is undertaken outside of Coleford – resulting in the leakage identified within the Core Strategy Policy.
- 5.9 The development of this store would result in a significant proportion of those customers staying in Coleford. Such a change would have significant benefits, including:
- Enhanced retail choice and competition;
 - Customers more likely to visit town centre retailers that they wouldn't ordinarily do;
 - Customers more likely to utilise in-centre services and facilities e.g. library;
 - Customers more likely to stay in Town and make use of food and drink outlets.
- 5.10 Evidently therefore, removing the potential leakage of spending to other local Centres will have a significant and material benefit to the overall vitality and viability of Coleford Town Centre.
- 5.11 In summary, the fact that a) the site is located within a designated Centre; b) there is a un-met need for 1200sqm of convenience retail floor space; c) the principle of retail use has been established on the site by the previous Tesco permission; d) the Tesco permission remains extant and can be implemented; and e) the site is allocated within the Local Plan for retail purposes, means that it is clear that the principle of retail use in this location is acceptable.

Design and Heritage

- 5.12 Policy CSP.1 requires new development proposals to consider important characteristics of the environment and conserve, preserve or respect them or enhance their contribution to the environment. The policy states that design is crucial to the appreciation and local distinctiveness of the area and that a high-quality environment is vital in promoting the economic future of the area. Ultimately, the policy stresses that ‘all new development should make a positive contribution to an area by way of its design’.

- 5.13 It is important to establish from the outset that the site is currently in a very poor condition. It is enclosed by metal hoarding, however, due to the surrounding topography, views into the site are available from a number of points. It therefore severely detracts from the character of the Centre, but also arguably the vitality and viability of the Centre by reducing its attractiveness as a place to visit.
- 5.14 As highlighted earlier in this statement, the previous application for a Tesco store on the site was initially refused by the Forest of Dean Council on design grounds and its impact on the character and appearance of the area. Accordingly, discussions at the subsequent appeal Inquiry centred around the design of the scheme – the main points from which are summarised in para.2.7 of this statement. It is worthwhile, however, examining the proposed scheme forming part of this application against the conclusions reached by the Inspector.

Contemporary Design

- 5.15 The appeal confirmed that the principle of contemporary design within Coleford Town Centre is acceptable, with paragraph 17 of the decision specifically identifying that “*A contemporary design without the use of solid brick elevations would be acceptable to the Council*”. It was therefore agreed that the use of red brick was appropriate in this location, given its surrounding context.
- 5.16 The proposed Lidl store seeks to echo this established and accepted principle by proposing the east and north elevations to be finished in red brick. From the main viewpoints to the east and north of the site, the building would sit comfortably within the Town Centre context. This approach was deemed acceptable by the Inspector.
- 5.17 It is also evident from the appeal decision that given that slate is predominantly used within the Centre, the use of a grey colour on the roof would assist in integrating the roof of the building into the wider context. The proposed Lidl store includes a grey steel sheet roof which would very much integrate with this principle.

Architectural Form

- 5.18 The form of the building, and more specifically the roof design was the subject of much discussion during the appeal. The Council objected to the use of a mono pitch roof, however, the Appellant indicated that the mono pitch would reflect the sloping topography of the site.
- 5.19 The Inspector agreed that the use of a mono pitch is ‘ideal here given the site’s topography’ (para.34 of the appeal decision). Accordingly, a mono pitch roof is proposed, which we also contend reflects the site’s topography.
- 5.20 Furthermore, the use of glazing on the eastern and part of the north elevation assists in reducing its mass within the more open views from the east and north – enabling the building to sit comfortably within its context.

Summary

5.21 Accordingly, and in light of the discussion had during the consideration of the Tesco appeal, the proposed Lidl store has sought to reflect those features previously considered acceptable into a bespoke design solution for this Coleford site.

5.22 Overall, as shown by the above considerations and the accompanying Design and Access Statement, it is evident that the proposals are sensitive with regards to respecting the local context and enhancing the surrounding area.

Highways and Accessibility

5.23 Core Policy CSP.1 Section 6.3 states that the means of travel to and from a development, and the infrastructure it needs have a direct bearing on the quality of the environment and will be considered as part of any proposals.

5.24 These issues have been considered within the accompanying Transport Assessment and the Design and Access Statement. These documents consider the following factors:

- The site is in a sustainable location due to its location within the designated Coleford Town Centre and through the existing vehicular access link into Pyart Court Shopping Centre, off Old Station Way, which will be retained and improved. This access point will become a shared access servicing both the Lidl Site and Pyart Court Shopping Centre.
- The provision of 76 car parking spaces, including 5 dedicated disabled spaces and 8 parent and child spaces, is considered acceptable for the nature of this development.
- The maintenance of the existing pedestrian links and the addition of new links will improve connectivity to and from the site through provision of safe and convenient travel routes.
- A ramped walkway will be provided to the north of the site, off Lord's Hill, leading to the store entrance area. A ramped walkway will also be provided to the rear of the site, which will improve connectivity and overall accessibility into Coleford Town Centre.
- Secure cycle parking spaces will be provided onsite in a well monitored location for use by staff and customers. This will enable cycling as a substitute to short car trips or part of longer journeys by public transport.
- The site is in a sustainable location with regards to bus service provision. Bus stops are provided within close proximity of the site providing local services in and around Coleford as well as to neighbouring areas.

5.25 The application is also accompanied by a Travel plan which seeks to maximise the use of public transport, and this can be conditioned as part of any permission that may be granted on the site.

5.26 The Assessment and accompanying travel plan has established that the proposed development of the site would not result in a severe impact on the highway network – the test set out within the

NPPF. Accordingly, the proposal is considered acceptable in the context of highways and transportation.

Ecology

- 5.27 A Preliminary Ecological Appraisal of the site has been undertaken by WYG and accompanies this application.
- 5.28 The report confirms that the site consists of a number of habitats, including scrub, scattered trees, ruderal vegetation and species poor grassland.
- 5.29 In terms of protected or notable species, the report indicates that additional surveys are required to establish the presence / likely absence of specific species. Additional surveys were undertaken in relation to bats and reptiles, however none were identified and are therefore likely to be absent from the site.
- 5.30 The report provides recommendations in respect of nesting birds i.e. to remove vegetation outside of nesting seasons. Furthermore, the report recommends that a pre-construction check is carried out in respect of badgers.
- 5.31 Finally, invasive species were also identified within the site. The report confirms that the method of removing and disposing of the species should be specified within any CEMP submitted.
- 5.32 In light of the above, it is evident that the proposed development can be integrated without causing harm to any protected species or habitats. Accordingly, the proposed development is in line with policy AP7 of the Allocations Plan.

Drainage

- 5.33 The accompanying Drainage Statement prepared by Waterco confirms that, subject to specific works on-site, the proposed Lidl store can be accommodated within the site from a drainage and flooding perspective.
- 5.34 The proposed store along with its associated access and parking areas would introduce impermeable drainage area resulting in an increase in surface water runoff. In order to ensure the increase in surface water runoff will not result in an increase of flood risk elsewhere, flow control and attenuation will be provided on site to accommodate storm events up to and including the 1 in 100 year plus 40% climate change event.
- 5.35 As required by policy, the Statement assesses several methods of surface water discharge and where soakaways are not possible, discharge of surface water to the culverted watercourse at a rate of 5l/s appears to be the most practical solution.
- 5.36 The report also confirms that attenuation storage will be required on site in order to restrict surface water discharge to 5l/s. This can be achieved through the introduction of attenuation tanks located beneath the car parking area. At the detailed design stage, the overall storage required within the

underground attenuation tank could be reduced through the use of permeable paving within the car parking areas.

- 5.37 Due to the location of an existing culverted watercourse (and associated manholes) and a foul sewer in the north-western corner, there may be a need to divert or discuss a 'build over' agreement with the relevant authority/owner.
- 5.38 Accordingly, it is considered that whilst further discussions will be required with the appropriate authorities, drainage and flooding issues can be appropriately dealt with in line with policy CSP.2 of the Core Strategy.

Other Material Considerations

Community Involvement

- 5.39 It is normal practice for Lidl to undertake community engagement prior to submitting a planning application. On the 4th of October 2018, a public exhibition was held in Coleford Town Centre to exhibit the proposed plans for the site. In advance of this, local residents were sent an invite to the event, along with a feedback form to complete and return to Lidl.
- 5.40 The results of this exercise are set out in the accompanying Statement of Community Involvement, however the main points to arise from this are:
- 6,726 response cards were mailed to local residents. These contained details of a Public Consultation event, along with information on the proposals and the opportunity for respondents to make suggestions and comments.
 - A total of 2,512 response cards were received, with 97.8% (2,456) being in support of the proposals; 45 were against, and 11 were undecided. The main areas of concern that were highlighted related to potential traffic increases / general traffic concerns.
- 5.41 Some of the reasons recorded in support were as follows:
- Lack of food retail within the local area, offering a differing price point and shopping experience;
 - Potential financial injection into the local economy;
 - Differing range from what is currently available; including non-food specials;
 - Many locals currently shop at Lidl, but have to travel some way to do so.
 - More responses in support are outlined on the next page.
- 5.42 In terms of the consultation event, this took place in a retail unit on Mushet Walk, an accessible and central location, and within a stone's throw of the subject site. The event was extremely well attended by local residents, with 347 attendees signing into the event, but in reality the number of attendees far exceeded this figure.

- 5.43 The feedback received on the day was overwhelmingly supportive, with comments received similar to those outlined on the response cards. Some concerns were raised during the day, again these were largely focused around potential traffic increases along Lord's Hill.

Economic Benefits

- 5.44 The economic role is one of the three dimensions for achieving sustainable development. In these terms, the economic role of sustainable development is to contribute to building a strong, responsive and competitive economy. The Government is committed to securing economic growth in order to create jobs and prosperity, and for the planning system to do everything it can to support sustainable economic growth as outlined the NPPF.
- 5.45 It is considered that the proposal will result in the following direct and indirect benefits:

Direct Benefits

- Multimillion pound investment by Lidl;
- Creation of up to 40 jobs with a range of skill levels from sales assistances to deputy manager level;
- Job opportunities are offered across a variety of socio economic groups which assists in delivering an inclusive society;
- Clawback of convenience and comparison spend to other areas e.g. Monmouth; and
- Economic growth and strengthening of the local economy in Coleford.

Indirect Benefits

- Creation of much-needed construction jobs and indirect jobs will be supported through supplies of construction materials; and
- Wages will be supported as a direct and indirect consequence of the proposal which in turn will be spent in the local economy;
- Benefits to the other retailers and services within Coleford from linked trips which do not currently take place due to a significant proportion of shoppers leaving the Town to shop elsewhere.
- Increasing the vitality and viability of the Centre;
- Sustainability – reduction in the number of longer vehicle trips to other local Town. Some of those attending the Consultation event commented that they would not be able to walk to Coleford to 'pick up a few things' whereas they would not have done so otherwise because of the lack of choice and competition in the Centre.

- 5.46 In considering the economic benefits of the proposal against the objectives of national and local policy, it is evident that there are clear economic benefits that should be afforded significant weight in the determination of the application. In particular, diversification of the employment base which will strengthen the local economy and reduce out-commuting for work, and perhaps most significantly clawing back expenditure that is currently going elsewhere to the wider benefit of Coleford Town Centre.

Sustainability

- 5.47 Lidl implement a variety of measures to minimise the environmental impact of its stores and to contribute toward sustainability objectives, including:
- Limiting deliveries 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 all paper/cardboard and plastic waste produced by the store. This means that over 90% 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;
 - 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 timer controls fitted.
- 5.48 Lidl also produce and implement Travel Plans to promote sustainable transport choices. A Travel Plan has been submitted as part of the application.
- 5.49 Lidl communicate to staff and customers on a continual basis and encourage all stakeholders to implement environmentally friendly practices where possible.

Noise

- 5.50 The accompanying noise assessment assesses the potential impact of activities associated with the food store, specifically plant and deliveries, on the nearby sensitive receivers around the site.
- 5.51 Noise from the operation of plant and from delivery vehicles are likely to be the main elements which could result in harm to the amenity of adjoining receivers. Both elements are assessed separately within the report.
- 5.52 In terms of plant, the assessment indicates that the impact on noise-sensitive receivers will be low.
- 5.53 Similarly, the impact from deliveries is assessed as being low-impact.

5.54 In light of the above, we consider the development noise to be acceptable in terms of environmental noise emission to the sensitive receivers in the area.

Trees

5.55 A Treey Survey has been undertaken by David Rice Forestry and Lorraine Corscadden Associates and is submitted alongside this application. The purpose of report is to identify the impact of the proposed development of the site on trees, both within and immediately adjacent the site, in accordance with the provisions of BS5837: 2012.

5.56 The development of the site would result in the removal of all trees on the site. The report outlines a number of measures to secure and protect all adjoining trees, whilst also outlining the potential for additional planting as part of a landscape scheme.

5.57 Accordingly, and with the potential for landscaping, it is considered that the development can be incorporated into the site without causing harm to any adjoining trees in accordance with policy AP7 of the Allocation Plan.

CHAPTER 6

SUMMARY AND CONCLUSION



6.0 Summary and Conclusion

- 6.1 The application proposal is fully compliant with the policies of the Local and Neighbourhood Plans, the principles of which having previously been 'tested' through the approval of the Tesco scheme at the subject site. As such, the principle of the development proposed should not be in question.
- 6.2 The proposal responds to a documented need for a convenience retailer in Coleford which can complement the other uses in the Town Centre and promote cross shopping trips between the store and other retail uses in the Town Centre.
- 6.3 In summary, the proposal will deliver the following benefits:
- Redevelopment of an underutilised area allocated for retail development within the defined Town Centre of Coleford;
 - Enhanced retail choice and competition through provision of a new purpose-built food store;
 - Retail expenditure contained within Coleford Town Centre with reduced leakages to town centres further afield;
 - Facilitated linked shopping trips between the store and the remainder of the town centre;
 - Provision of up to 40 new retail jobs for residents;
 - Indirect employment benefits associated with the construction and on-going servicing of the store;
 - Delivery of a bespoke and sustainable store with a designated in – store bakery;
 - Provision of car parking;
 - Enhancement of pedestrian connectivity to and from the Town Centre.
- 6.4 The reports submitted in support of this application demonstrate that the development is in a sustainable location, will respect the surroundings of the local area, is of appropriate scale and density to respect the Town Centre location, will provide access through a variety of transport forms and will encourage linked trips to the rest of the shopping centre.
- 6.5 The proposal is deemed to be fully in accordance with National and Local Planning Policy which clearly state that development providing sustainable economic development should be treated favourably.
- 6.6 In conclusion, it is evident that the proposed development is in accordance with Planning Policy, and specifically policies CP.14 of the Core Strategy and AP55 of the Allocation Plan which directly deal with Coleford and the need for additional convenience retailing in Coleford, and, therefore, there is no reason why planning consent should be withheld for this proposal.

APPENDIX 1

TESCO APPEAL DECISION





PLANNING

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