



Retail and Centres

Background Paper

October 2024



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1. Introduction and policy context

In undertaking a Local Plan Review, the authority seeks to ensure policies are updated to ensure they are aligned to National policy in order to make robust and up to date assessments of planning applications.

Retail policies within the Coventry Local Plan 2017 were prepared to help guide, inform and consider development proposals for the creation or removal of retail uses across Coventry.

The Retail section of the Local Plan 2017 contains six policies, which cover a range of themes within the sphere of retail.

The Local Plan Review process seeks to review all policies and considers if any require updating or bringing in line with changes within the sector or following updates to national policy. At regulation 18 consultation, feedback was sought on the retail chapter of the Local Plan and how best to ensure policies remain fit for purpose.

The Council commissioned Lambert Smith Hampton to undertake a Retail and Centres Study. Part one which focused on overarching themes and policy direction was published as part of the Regulation 18 “Issues and Options” Consultation. Part two focused on detailed policy, centres and elements such as Primary Shopping Areas. This study is published as part of the suite of evidence documents for the Regulation 19 Draft Submission Consultation.

National Policy Context

Paragraph 20 of the December 2023 National Planning Policy Framework references the need to establish strategic policies which make sufficient provision for retail provision:

“Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for: a) housing (including affordable housing),

employment, retail, leisure and other commercial development;”

Chapter 7 provides more detail on policies which support the role of town centres.

Paragraph 90 states:

“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.”

At the time of writing a new NPPF was being consulted on, released in July 2024. The Regulation 19 Plan has been prepared under the December 2023 NPPF, however, regard has been had to any potential forthcoming changes which might have implications for plan-making, however, the consultation version proposes no changes to retailing and centres.

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Retail Policies aside other plan policies

Development proposals for change into or out of retail use across Coventry are subject to policies contained within the retail chapter of the Local Plan. Whilst the core policies in this context are contained within this chapter, other Local Plan policies are of relevance, particularly Policies DS3 and DS4, as well as Policies H3 and CO2.

2. Regulation 18 Issues and Options Consultation

The first stage of the Local Plan Review process was undertaken in summer 2023 when the 'Regulation 18' ('Issues and Options') consultation was held between 18th July and 29th September. It should be noted that at this time the NPPF was the version published on 20th July 2021, and it was this version under which the consultation documents had been prepared.

The Issues and Options Consultation questions and suggested policy approach were informed by the Retail Topic paper prepared by Lambert Smith-Hampton on behalf of the Council. The suggested recommendations made as part of that study are summarised below.

- Policies should not include specific floorspace figures for forecast retail and leisure needs and for site allocations, particularly in respect to Coventry's centres, which may otherwise discourage investment where limited or no floorspace capacity is identified.
- No requirement within the NPPF to identify primary and secondary shopping frontages on the basis that frontage policy cannot control the balance of retail and non-retail uses now that Class E affords flexibility for shop units to change across a broad range of commercial town centre uses.
- However, there is still a requirement in the NPPF to identify Primary Shopping Areas for the city centre and the district centres, which need to be defined in order to categorise sites as edge of centre and out of centre for the purpose of applying the sequential test to edge and out of centre retail development proposals.
- The existing Local Plan identifies a single local floorspace threshold for triggering the need for an edge or out of centre retail development proposal to undertake a retail impact assessment. However, there may be benefit in applying different floorspace thresholds for the city centre, major district centres and district centres.
- Stricter controls could be applied to managing new hot food takeaway proposals where policy can apply limits on the proportion of outlets allowed to

operate as hot food takeaways within a defined area (e.g. primary shopping area). Policy can also be used to prevent the opening of hot food takeaways or restrict their trading hours within a particular radius of a school.

- Opportunities to apply for Article 4 Directions will be explored where there is a strong case to make, particularly where the Council may wish to ensure that particular buildings continue as office and retail use.

3. Suggested approach at Issues and Options stage and the evidence base

Policy R1: Delivering Retail Growth

This policy is about levels of retail growth across Coventry and what quantum, if any, should be applied. The Retail and Centres Study 2024 evidence shows that City Centre allocations are no longer required to meet any quantitative need for convenience or comparison floorspace and that similarly, there is no quantitative requirement for further retail development at Cannon Park MDC, Brade Drive DC or Jardine Crescent DC. These allocations are therefore no longer required. The Policy was amended to reflect Eastern Green and Keresley allocations as maximums to ensure a local need is met, rather than creating a city wide catchment within a local area. Part three of the policy was amended to include other main town centre uses and to include Brandon Road MDC as a centre at which further expansion will not be supported.

Policy R2: Coventry City Centre – Development Strategy

This policy discusses the approach to development within the City Centre. It was considered to remain fit for purpose, with a minor change made to remove reference to the Area Action Plan which was proposed to be amalgamated into the wider Local Plan as part of the review.

Policy R3: The Network of Centres

This policy discusses defined centres across Coventry. Part A was proposed to be removed as limited control is available over retail (Class E) uses in centres and therefore the ability to maintain a balance based on retail may not be measurable or subject to controls through the planning system. Part 2B has been removed due to as Class A uses no longer existing and Class E uses do not require planning permission in centres. Therefore, the ability to measure and control is limited.

No changes were proposed to the centres hierarchy apart from the removal of Sutton Avenue Local Centre, as recommended by the Retail and Centres Study 2024. The centre is located close to existing centres and is considered to serve a very local

community catchment, which functions more as a parade of shops as opposed to a centre.

As recommended in the study, six centre boundaries were proposed to be amended to reflect recent changes to the built form or uses in the area. These are Ball Hill, Foleshill and Jardine Crescent District Centres and Far Gosford Street, Keresley Road and Winsford Avenue Local centres. These remain defined centres and therefore no overall policy change, but amended boundaries are reflected on the Proposals map and associated site specific maps.

Following submission of the Eastern Green Application, it was proposed that the SUE comprises a District Centre of approximately 10,000sqm mixed use development and a Local Centre of approximately 1,000sqm mixed use development. Therefore, the policy was updated to reflect these changes.

Following submission of the Keresley Application OUT/2019/0484, the Keresley North Local Centre was removed due to existing local provision in Keresley End Village. The allocation of the Southern Local Centre remains unchanged. Therefore, the policy was updated to reflect these changes.

Policy R4: Out of Centre Proposals

This policy discusses Out of Centre proposals and the requirements for sequential and impact tests. The policy was amended to reflect national policy by removing references to retail, due to changes in the Use Classes Order and reference Main Town Centre Uses. Additions were made to refer to use classes E and F to reflect changes to the Use Classes Order. Changes have been made to Impact Tests in part 3 to reflect the recommendations in the Retail and Centres study 2024.

Policy R5: Retail Frontages and Ground Floor Units in defined centres

The amendments proposed to remove A Class uses and insert E Class uses following changes to Use Classes Order. The wording on the requirement for shop frontage design was also updated.

Policy R6 Restaurants, Bars and Hot Food Takeaways

No change to Policy R6 other than the insertion of a reference to the Hot Food Takeaway SPD or future replacement.

4. A summary of the key issues raised by respondents at Issues and Options

Policy R1: Delivering Retail Growth

Q56: Do you think the centres listed in this policy remain fit for purpose and should be retained as allocations within this policy?

Context / summary of responses: This question related to the current hierarchy of centres querying whether this still remains applicable. There was agreement and respondents also felt retail should be focused on the city centre, targets should be aspirational and mixed use should be supported where it supports regeneration.

Q57: Do you have any comments on a potential change to policy wording to include tourism in relation to the Arena Park Major District Centre?

Context / summary of responses: This question was asked as it is considered that the area is a key tourist attraction, and this could be recognised in policy. There was agreement with the proposed change. One comment was made that other developments in the vicinity should not have to consider functions of the district centre when applying sequential assessment and that further guidance may be needed on the impact test or how the proposal would be considered an essential element of supporting wider 'tourism'.

Policy R2: Coventry City Centre – development strategy

Q58: Do you have any comments on the insertion of a reference to limit the disproportionate concentration of sui generis uses within frontages?

Context / summary of responses: Sui-generis uses mean those which do not fit into a defined 'use class', and the question sought views on whether such uses should be limited in the centre. It was commented that some sui generis uses contribute to vibrant town centres / footfall, that the vacancy rate could increase, would need to define where restrictions apply as should be focusing on retail frontages and corridors, each case should be considered on its merits.

Policy R3: The Network of Centres

Q59: Do you have any comments on the proposed changes to the above paragraph?

Context / summary of responses: The 'above paragraph' referred to in the question proposed to amend the final paragraph of part five of the policy (Local Centres) to read: 'day to day convenience shopping and proportionate main town centre uses.' This reflects the fact they are local centres and often are of a small scale and serve a local role in the community. Responses were mixed, with one suggesting that accessibility criteria should be included.

Q60: With the above in mind, do you have any comments on whether the centres listed in this chapter of the Local Plan remain fit for purpose, or should changes to the hierarchy and/or defined centres be made?

Context / summary of responses: In this question, the 'above' refers to 'as part of ongoing work with our consultants we will be re-visiting the hierarchy of centres and considering if the centres currently defined in the Local Plan remain fit for purpose.' Responses were mixed, with one suggesting hierarchies are unnecessary and another proposing that Gallagher retail park should be allocated as a District Centre.

Policy R4: Out of Centre Proposals

Q61: Do you have any comments on whether part one of Policy R4 should include reference to hot food takeaways?

Context / summary of responses: The proposal was that part one of the policy be amended to read: Proposals for retail, Main Town Centre uses and hot food takeaways (including proposals for the expansion or reconfiguration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate). This approach was supported by the majority of respondents. However, one person stated there was no evidence to support this, that hot food takeaways will not undermine the role and function of town centres and policy R4 follows Government policy regarding the sequential test.

Q62: Do you have any comments on the creation of primary shopping areas in the City Centre, Major District and District Centres?

Context / summary of responses: This question was based on bringing local policy up to date with national policy and had support from all respondents.

Q63: Do you agree with our suggestion that due to their scale, Local Centres should not have primary shopping areas defined and should use the centre boundary for all elements of sequential assessment?

Context / summary of responses: This question was asked as, given the use classes order has changed significantly, it was considered this policy may no longer be necessary, especially in light of the broad spectrum of uses which can occupy an E Class unit without needing planning permission. Respondents agreed and suggested this should also be applied to the Area Action Plan policy CC22.

Policy R6: Restaurants, Bars and Hot Food Takeaways

Q65: Do you agree with our proposals for the deletion of ‘normally’ and to add in ‘adopted’ where suggested?

Context / summary of responses: The current use of the term ‘normally’ in adopted policy can be ambiguous, (‘Hot food takeaways often attract considerable customer numbers and are regularly associated with issues such as litter, waste disposal, noise, odour, traffic and health. For a combination of these reasons, they will normally only be supported within defined centres where residential amenity is less likely to be an issue and will be resisted elsewhere’). It was proposed that ‘adopted’ is added in reference to the Hot Food Takeaway SPD for clarity. There was a mixed response to this proposal, with some respondents agreeing, some suggesting that no more takeaways should be permitted.

Q66: Do you have any comments on our suggestion that reference should be made to the 5- minute walk school exclusion zone?

Context / summary of responses: This question was asked in order to gauge views on an exclusion zone around schools for hot food takeaways. Overall this approach was supported, with comments around advertising restrictions and the need to define how the walk time is calculated. One comment suggested that flexibility is needed and therefore a walk time of five minutes is not appropriate.

5. Further Evidence to Inform Regulation 19 and proposed Policy

Part two of the Retail and Centres study (February 2024) is published alongside all other evidence as part of the Regulation 19 consultation and has been used, together with part one of the Retail and Centres study to inform the proposed retail policies in the Local Plan review. The recommendations of the Part Two study are summarised below.

When considering how this new information on market trends and the existing health of Coventry's centres should inform future planning policy, the starting point is the NPPF which sets out the requirements for local plans. Having reviewed this and considered the local position, policy recommendations are summarised below.

| Existing Local Plan Policy | Proposed Changes | | | | | | | | | | | | | | | | | | | | | | | | |
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| <p>Policy R1 Delivering Retail Growth</p> <p>1. The following sites/areas are allocated to support the provision of retail floor space across Coventry. These schemes are to be delivered in accordance with the specifications in this policy and other policies within this plan and the City Centre AAP as appropriate.</p> <table><tr><th>Site</th><th>Proposed floor space (sq.m gross)</th><th>Details</th></tr><tr><td>City centre</td><td>At least 70,100</td><td>A1-A5 uses of varying size (including bulky goods retail where appropriate) to be delivered through the Area Action Plan at City Centre South, City Centre North, Friargate, City Centre Supermarket and wider support for the creation of active frontages within the wider city centre. Also includes allowance for city centre vacant units.</td></tr><tr><td>New Eastern Green Major District Centre</td><td>Up to 10,000</td><td>To include approx. 5,000sq.m for a new superstore, 4,000sq.m of predominantly bulky goods retail and up to 1,000sq.m of small scale local provisions.</td></tr><tr><td>Cannon Park Major District Centre*</td><td>6,200</td><td>New A1 elements of the scheme should be restricted to convenience and bulky goods retail. Non A1 uses will be supported to encourage diversification of the centre, especially around A2-A5 uses.</td></tr><tr><td>New Keresley Local Centre south</td><td>1,500</td><td>Local centre to include a range of small scale units providing a range of local community uses and top up provisions.</td></tr><tr><td>New Keresley Local Centre north</td><td>1,000</td><td>Local centre to include a range of small scale units providing a range of community uses and top up provisions.</td></tr><tr><td>Brade Drive District Centre</td><td>1,000</td><td>New retail floor space should be focused around new A1-A5 uses and other non-retail uses. This should be delivered in small scale units to support local needs and help diversify the centre's current offer.</td></tr><tr><td>Jardine Crescent District Centre</td><td>500</td><td>New floor space to be provided as part of mixed use schemes within amended centre boundary. A1-A5 uses to be provided, which reflect the existing character of the centre.</td></tr></table> | Site | Proposed floor space (sq.m gross) | Details | City centre | At least 70,100 | A1-A5 uses of varying size (including bulky goods retail where appropriate) to be delivered through the Area Action Plan at City Centre South, City Centre North, Friargate, City Centre Supermarket and wider support for the creation of active frontages within the wider city centre. Also includes allowance for city centre vacant units. | New Eastern Green Major District Centre | Up to 10,000 | To include approx. 5,000sq.m for a new superstore, 4,000sq.m of predominantly bulky goods retail and up to 1,000sq.m of small scale local provisions. | Cannon Park Major District Centre* | 6,200 | New A1 elements of the scheme should be restricted to convenience and bulky goods retail. Non A1 uses will be supported to encourage diversification of the centre, especially around A2-A5 uses. | New Keresley Local Centre south | 1,500 | Local centre to include a range of small scale units providing a range of local community uses and top up provisions. | New Keresley Local Centre north | 1,000 | Local centre to include a range of small scale units providing a range of community uses and top up provisions. | Brade Drive District Centre | 1,000 | New retail floor space should be focused around new A1-A5 uses and other non-retail uses. This should be delivered in small scale units to support local needs and help diversify the centre's current offer. | Jardine Crescent District Centre | 500 | New floor space to be provided as part of mixed use schemes within amended centre boundary. A1-A5 uses to be provided, which reflect the existing character of the centre. | <p>The City Centre allocations are no longer required to meet any quantitative need for convenience or comparison floorspace. However, qualitative needs are likely to remain particularly in the context of regeneration proposals.</p> <p>The Eastern Green allocation should be updated to allow more flexibility in the end uses, to include appropriate provision of retail and leisure uses.</p> <p>There is no quantitative requirement for further retail development at Cannon Park, Brade Drive DC or Jardine Crescent DC. These</p> |
| Site | Proposed floor space (sq.m gross) | Details | | | | | | | | | | | | | | | | | | | | | | | |
| City centre | At least 70,100 | A1-A5 uses of varying size (including bulky goods retail where appropriate) to be delivered through the Area Action Plan at City Centre South, City Centre North, Friargate, City Centre Supermarket and wider support for the creation of active frontages within the wider city centre. Also includes allowance for city centre vacant units. | | | | | | | | | | | | | | | | | | | | | | | |
| New Eastern Green Major District Centre | Up to 10,000 | To include approx. 5,000sq.m for a new superstore, 4,000sq.m of predominantly bulky goods retail and up to 1,000sq.m of small scale local provisions. | | | | | | | | | | | | | | | | | | | | | | | |
| Cannon Park Major District Centre* | 6,200 | New A1 elements of the scheme should be restricted to convenience and bulky goods retail. Non A1 uses will be supported to encourage diversification of the centre, especially around A2-A5 uses. | | | | | | | | | | | | | | | | | | | | | | | |
| New Keresley Local Centre south | 1,500 | Local centre to include a range of small scale units providing a range of local community uses and top up provisions. | | | | | | | | | | | | | | | | | | | | | | | |
| New Keresley Local Centre north | 1,000 | Local centre to include a range of small scale units providing a range of community uses and top up provisions. | | | | | | | | | | | | | | | | | | | | | | | |
| Brade Drive District Centre | 1,000 | New retail floor space should be focused around new A1-A5 uses and other non-retail uses. This should be delivered in small scale units to support local needs and help diversify the centre's current offer. | | | | | | | | | | | | | | | | | | | | | | | |
| Jardine Crescent District Centre | 500 | New floor space to be provided as part of mixed use schemes within amended centre boundary. A1-A5 uses to be provided, which reflect the existing character of the centre. | | | | | | | | | | | | | | | | | | | | | | | |

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| | <p>allocations are therefore no longer required.</p> <p>Allocations at the new Local Centres at Keresley North and Keresley South could be updated to remove the floorspace amount or express it as a maximum. Some guidance on the size of units should also be included.</p> |
| 2. The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area. | No change |
| 3. Further retail provision at Arena Park Major District Centre will not be supported during the plan period unless it is demonstrated that it will not have a significant adverse impact on the city centre or is an essential element of supporting the wider parks tourism functions. | <p>The reference to 'retail' should be expanded to include leisure and other town centre uses.</p> <p>Consideration should be given to extending the reference to Arena Park MDC to also include Brandon Road MDC.</p> |
| <p>Policy R2: Coventry City Centre – Development Strategy</p> <p>1. The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture. This will be achieved by:</p> <ul style="list-style-type: none"> a. Enhancement of its position as a focus for the entire sub- region and as a national and international destination to live, work and play; b. Enhancement of its retail and leisure offer to strengthen the city's sub-regional role; c. Provision of high quality office space; d. Becoming a hub for education; | <p>No change to Part 1.</p> <p>Part 2 to be removed/updated as appropriate.</p> |

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| <p>e. Including a variety of places to live which cater for different needs;</p> <p>f. Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;</p> <p>g. A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;</p> <p>h. Accessible for all;</p> <p>i. Providing an attractive and safe environment for pedestrians, cyclists and motorists;</p> <p>j. Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;</p> <p>k. High quality sustainable built design;</p> <p>l. Continuing to develop a vibrant and attractive night time economy;</p> <p>m. Providing opportunities to improve health and wellbeing;</p> <p>n. Continuing to support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan;</p> <p>o. Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch;</p> <p>p. Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible.</p> <p>2. An Area Action Plan will be developed to help deliver this strategy and support and guide development within the city centre.</p> | |
| <p>Policy R3: The Network of Centres</p> | <p>No change.</p> |

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| <p>1. To support the city centre, the Council will designate, enhance, maintain and protect a network of Centres consisting of Major District Centres, District Centres and Local Centres. These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment.</p> | |
| <p>2. In all these Centres:</p> <ul style="list-style-type: none"> a. A balance will be sought between shops (Class A1), and other Main Town Centre and community uses in order to protect the vitality and viability of the centre as a whole; b. Proposals that reduce the concentration of A-class uses within a centre below 51% will not be approved; c. A residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment and so long as it does not undermine the functionality of the centre; d. Improvement to the environment and accessibility will be promoted and encouraged. | <p>Reference to Class A1 at (a) should be removed.</p> <p>Part (b) should be removed or updated to refer to Class E with a new threshold value.</p> <p>No change to (c) or (d).</p> |
| <p>3. Major District Centres are shown on the Policies Map at:</p> <ul style="list-style-type: none"> a. Arena Park; b. Cannon Park; c. Brandon Road; d. Eastern Green. <p>They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city for:</p> <ul style="list-style-type: none"> e. a mix of bulk convenience and comparison shopping as well as service and catering uses; | <p>Final part of the policy referencing the types of development that can be accommodated within the MDCs should be removed to allow flexibility of uses which support the needs of their part of the city.</p> |

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| <p>f. social, community and leisure uses including hotels;</p> <p>g. offices.</p> | |
| <p>4. District Centres are shown on the Policies Map at:</p> <p>a. Ball Hill;</p> <p>b. Bell Green;</p> <p>c. Brade Drive;</p> <p>d. Daventry Road;</p> <p>e. Earlsdon;</p> <p>f. Foleshill</p> <p>g. Jardine Crescent</p> <p>h. Jubilee Crescent</p> <p>They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small scale office uses will also be acceptable.</p> | No change. |
| <p>5. Local Centres are shown on the Policies Map at:</p> <p>a. Acorn Street;</p> <p>b. Ansty Road;</p> <p>c. Baginton Road;</p> <p>d. Bannerbrook;</p> <p>e. Barkers Butts Lane;</p> <p>f. Binley Road;</p> <p>g. Birmingham Road;</p> <p>h. Broad Park Road;</p> <p>i. Charter Avenue;</p> <p>j. Far Gosford Street;</p> <p>k. Green Lane;</p> | No change |

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| <p>l. Hillfields; m. Holbrook Lane; n. Holyhead Road; o. Keresley North; p. Keresley Road; q. Keresley South; r. Longford; s. Quorn Way; t. Radford Road; u. Station Avenue; v. Sutton Avenue; w. Walsgrave Road; x. Willenhall; y. Winsford Avenue.</p> <p>They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable.</p> | |
| <p>Policy R4: Out of Centre Proposals</p> <p>1. Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).</p> | <p>No change</p> |

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| <p>2. Sequential Assessment</p> <p>a. A Sequential Assessment will be required for all retail and other Main Town Centre use proposals outside a defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3.</p> <p>b. Where in-centre options are exhausted, edge of centre locations (within 300m of a centre boundary) that are well connected and accessible to the centres themselves should also be considered in advance of out of centre sites.</p> | <p>Paragraph 2 needs updating to refer to the NPPF definitions which are 300m from the PSA for retail proposals and 300m from the town centre boundary for other town centre uses.</p> |
| <p>3. Impact Test</p> <p>a. An Impact Test will be required for all retail and other Main Town Centre use proposals outside a defined centre that exceed 1,000sq.m (gross) floor space. The Assessment of Impact should be prepared in accordance with national guidance and consider the potential impact on the vitality, viability, role and character of a defined centre(s) within the centres hierarchy (as set out in policy R3).</p> <p>b. Catchment areas for Sequential Assessments and Impact Tests will be considered on a case by case basis to reflect the specific proposals being considered.</p> | <p>Paragraph 3(a) needs updating to refer to the new thresholds proposed.</p> <p>Paragraph 3(b) could be reworded to refer to the appropriate centres to be considered when undertaking the sequential and impact tests will be considered on a case by case basis.</p> |
| <p>Policy R5: Retail Frontages and Ground Floor Units in defined centres</p> <p>1. Proposals to use ground floor units within defined centres for non-A class uses will normally be permitted provided that:</p> <p>a. the primary retail function of the centre would not be undermined in the context of Policy R3;</p> <p>b. the use would make a positive contribution to</p> | <p>Reference to Class A needs updating to refer to Class E.</p> |

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| <p>the overall role, vitality and viability of the centre;</p> <p>c. the use is compatible with other Plan policies.</p> | |
| <p>2. The impact of a proposal on the primary retail function of a centre will be determined on the basis of:</p> <p>a. the location and prominence of the unit within the relevant frontage;</p> <p>b. the width of the frontage of the unit when compared to other units in the centre;</p> <p>c. the number and proximity of other units occupied by 'A' class uses;</p> <p>d. compatibility of the proposal with nearby uses.</p> | <p>Reference to Class A needs updating to refer to Class E.</p> |
| <p>Policy R6 Restaurants, Bars and Hot Food Takeaways</p> <p>1. Outlets should be located within defined centres and will normally be discouraged outside those locations.</p> <p>2. Proposals within defined centres will be permitted provided they:</p> <p>a. would not result in significant harm to the amenity of nearby residents or highway safety;</p> <p>b. would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet;</p> <p>c. are in accordance with the emerging Hot Food Takeaway Supplementary Planning Document (in particular, proposals for A5 uses); and</p> <p>d. are compatible with other Plan Policies.</p> | <p>Reference to restaurants needs to be removed.</p> <p>Paragraph 1(c) needs to be updated to remove the reference to A5 uses and reference the adopted SPD.</p> |
| <p>Policies Map</p> | <p>Policies map needs to be updated to reflect introduction of PSAs for all Major and District Centres.</p> |

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| | Town centre boundaries need to updated to reflect proposed changes. |
| New Policy – Local Parades/Stores | Suggest a new policy is included to support and protect local shopping parades and stores. |
| New Policy – Markets | Suggest a new policy is included to support and protect markets. |

Having assessed the recommendations within the report as a whole, including the removal of Sutton Avenue Local Centre from the hierarchy, as well as boundary and threshold changes, it is considered the policies as set out in the Draft Local Plan and as summarised below are robust and based on up to date evidence.

6. Retail Policy Evolution

Policy R1: Delivering Retail Growth

The overall aims of the policy are seen to be robust and reflective of the current context. Part one of the policy has been amended following the findings of the Retail and Centres Study 2024. Comparison and Convenience floorspace figures have been amended to reflect current retail trends and the changing nature of retail in Coventry. Part two of the policy remains unchanged, as the comprehensive redevelopment of Riley Square at Bell Green remains a priority. Part three of the policy has been expanded to include Brandon Road Major District Centre as a site where further expansion of retail and town centre uses will not be supported.

Policy R2: Coventry City Centre – Development Strategy

The policy wording remains up to date. Minor changes to remove references to the Area Action Plan, and to instead cross reference to the new City Centre section of the Local Plan.

Policy R3: The Network of Centres

The tenet of this policy remains up to date and compliant with the requirements set out in the NPPF. However, some minor wording changes have been made to reflect national changes to the Use Classes Order since the original policy was prepared. No Changes are proposed to the centres hierarchy, however following the findings of the Retail and Centres Study 2024, Sutton Avenue Local Centre is proposed to be removed due to its local community function as opposed to it functioning as a defined centre. Several centre boundary changes are also proposed to reflect recent changes to the built form and uses in those areas. Amended boundaries are at Ball Hill, Foleshill and Jardine District Centres and Far Gosford Street, Keresley Road and Winsford Avenue Local Centres.

The retail and centres study suggested that a new policy could be introduced which makes provision for local parades of shops, as they make a valued and necessary contribution to the local community, for both community cohesion and on the grounds of sustainability and health. However, having considered the possible options and the

fact that local parades sit outside of the scope of the centres hierarchy, we have decided that a new policy would not be appropriate. However, we have included some wording within the supporting text to chapter eight of the Regulation 19 proposed submission version of the Local Plan, citing the need to use planning judgement on a case-by-case basis depending upon local context.

The Retail and Centres Study suggests that a policy be created which protects markets. We consider that markets function the same as conventional retail and therefore any proposals to create or lose markets would be considered in the same way as other retail premises.

Policy R4: Out of Centre Proposals

The policy remains broadly valid and in line with the NPPF. However, some changes are proposed in order to reflect national policy amendments since the 2017 Plan was adopted. These include the removal of references to retail in part two of the policy, given changes in the Use Classes Order which include retail as part of other main town centre uses within Use Class E. Also proposed is the addition of reference to Use Classes E and F, again, to reflect changes in Use Classes Order. Part two also introduces primary shopping area catchments and centre boundary catchments as set out in the NPPF and Retail and Centres Study 2024 respectively. Changes to Part three to reflect recommendations from the Retail and Centres study 2024 in relation to Impact test and floorspace thresholds are also made.

Policy R5: Retail Frontages and Ground Floor Units in Defined Centres

Policy retained and amended to reflect national use class order changes. Amendment to part one of the policy to remove A Class Use and insert E Class Use following changes to Use Classes Order. Amendment of wording to part two of the policy to reflect an updated frontage policy.

Policy R6: Restaurants, Bars and Hot Food Takeaways

No change to Policy R6 other than the insertion of a reference to the Hot Food Takeaway SPD or future replacement.

7. Conclusion

As part of reviewing retail policies, a number of requirements for updates have been identified. The plan review proposes to remove areas of repetition to core plan policies in order that the policy requirements are clearly defined, whilst additional clarity is provided to reflect national changes and changes across the sector in recent years. Given those ongoing changes within the retail sector, Local Plan policies have been updated to reflect:

- The Use Classes Order
- Seek to clarify the correlation between retail, E and F Use Classes
- Reflect feedback raised during the Regulation 18 Consultation.

Retailing and main town centre policies remain an important role in the planning policy landscape and whilst the sector has experienced a range of changes in recent years, the fundamental tenet of retail policy within the Local Plan Review is largely fit for purpose.

Fig 1 – Defined Centres Map

