

Mr L Oliver
Planning Department
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

17 August 2021

Our Ref: 5808

Dear Mr Oliver

Objection to APP/20/01221 – Land to the west of B&Q, Purbrook Way, Havant

This letter has been drafted in response to the additional information submitted on behalf of Lidl by Simply Planning on 28 May 2021 in response to our letter dated 09 April 2021. This letter should be read in conjunction with our letter of 09 April 2021.

Catchment Area

We note that the applicant has provided additional clarification with regard to the catchment area of the proposed store which will mainly comprise the residential areas to the west of the A3. We note that Lidl have indicated that their stores have a circa 800m walk-in catchment (equivalent to a 10 minute walk). There are limited residential areas within a 10 minute walk of the site with the closest being to the east of the A3.

In addition Lidl note that their stores have a 5 minute drivetime catchment. The presence of the adjacent A3 influences the areas that can be reached within a 5 minute drivetime. The edges of Waterlooville and Havant are both within this five minute drivetime.

Sequential Site Assessment

An additional sequential site assessment has now been submitted which includes both Havant and Waterlooville.

This assessment includes Units 4 and 5 on the Solent Retail Park in Havant which comprise part of the primary retail frontage and for the purposes of decision making are in an in-centre location. The units have been dismissed by the applicant as unsuitable.

It is not unusual for Limited Assortment Discounters to trade from existing retail parks. As you are aware there is an existing Aldi store at Central Retail Park in Havant, and Lidl are represented on a number of retail parks around the country. For example, Lidl obtained planning permission to occupy two adjacent units at the Solartron Retail Park in Farnborough in September 2020 (20/00287). The existing combined GIA of these two units was 1,539 sq m. The application submitted on behalf of Lidl included a small rear extension, installation of a mezzanine, erection of an internal plant deck along with the necessary external works. The additional works increased the GIA of the unit by 362 sq m. In the current application the applicant has dismissed the Units at Solent Retail Park (which have a combined floor area of 1,571 sq m) stating that:

Directors
Helen Cuthbert | Stuart Slater | Claire Temple | Alastair Close
Dan Templeton
Associate Directors
Gail Turvey | Heather Vickers | Alan Williams

Consultant
Lorna Byrne
Associates
Sally Arnold | Rob Scadding | Penny Moss | Sam Deegan | Paul Galgey
Nial Ferrahan | Phil Marsden | Charlotte Perry | Charlotte Hunter

"Even allowing for flexibility the combined units are of insufficient size to accommodate the application proposals, or a flexible form of them. The units would likely necessitate the provision of additional mezzanine floors which would hinder the efficient stock handling procedures of the operator. Spreading the proposal across multiple floors would not be acceptable to the retailer."

Lidl have demonstrated elsewhere that units of this size at the outset are suitable for their business model and therefore this unit should not be dismissed as unsuitable due to its size.

It is recognised that the parking provided in this location is below the minimum set out the Havant Parking Standards SPD. It is worth noting that information submitted in support of application APP/20/00688 highlighted that the car parks would be able to accommodate any additional demand generated by the addition of food retail in this location. It is noted that the application was in part refused due to a lack of sufficient highways information. The issue of parking capacity in this location is therefore unresolved.

As noted in the Simply Planning letter dated 28 May 2021:

"Many customers use Lidl stores to purchase part of their main grocery shop (for example basic staples), often on foot, taking advantage of the low prices but then proceed to visit other retailers to purchase more specific or specialist food and grocery items."

In an accessible location (such as the Solent Retail Park) therefore, a lower level of car parking may be appropriate.

As set out above there are locations where Lidl trade from retail parks which operate with shared car parking. The presence of shared car parking is not in itself a reason to dismiss the suitability of the unit.

The additional information concludes by stating:

"As a result, the site is unsuitable in sequential test terms for both the development, or a suitably flexible form of it. The clear under provision of car parking would place Lidl at a critical trading disadvantage when compared to their main competitors within the catchment and would represent a significant compromise when compared to application proposals. Available units at Solent Retail Park are categorically not suitable from a car parking perspective and are also of insufficient size, even when allowing for flexibility."

"For these reasons, the site is not suitable for sequential test purposes and has been discounted on this basis."

The Solent Retail Park is located in an in-centre location. Limited Assortment Discounters are found located on retail parks, with car parking shared with adjacent users. In the last year Lidl have obtained planning permission for a unit which was smaller than those at the Solent Retail Park. The applicant has not satisfactorily demonstrated that the site is not suitable and therefore until such time as this information is provided the sequential site assessment is not passed.

Impact and the Protection of Other Stores

It is noted that Lidl have indicated that "the store will function as a neighbourhood store serving a compact and localised catchment" the catchment area of the store has been explored in some detail elsewhere in this letter and therefore we do not propose to repeat this information here. The recognition of overlap with other Lidl stores is noted, particularly given the location of these stores and their role as anchors in district centres. It is perhaps unfortunate that Lidl are not able to provide any form of firm commitment to retaining these stores. If there are no plans to close any existing stores, then a S106 mechanism would not be restrictive as it would formalise the position set out by Lidl in the planning application.

I trust the above information is helpful in considering this application. If you require any additional information please do not hesitate to contact me.

Yours sincerely,

