

Respondent ID

0026

Full Name

Andrew Meredith (Rapleys LLP)

If you are responding on behalf of a business, charity or other organisation, please state who you are responding on behalf of.

Lidl Great Britain Limited

SPATIAL VISION

The plan sets out a spatial vision for Tameside that hopes to support in the vision and priorities within the Council's Corporate Plan. The proposed vision for the plan is set out below.

Tameside in 2042 will be:

- **Homes: A place where people are proud to live, with a range of attractive and affordable homes that meet local needs.**
- **Jobs: A place with a strong local economy where businesses choose to remain, invest and grow, and where residents can learn and earn.**
- **Centres: A place with a range of strong, vibrant and diverse centres which serve their local communities and where people want to spend time.**
- **Travel: A well-connected place, where active travel is the first and natural choice, with high quality public transport connections, where people can travel safely and conveniently to destinations both within and beyond the borough.**
- **Places: A place where our cultural and built heritage are cherished, and where good design creates sustainable, safe, inclusive and accessible places.**
- **Environment: A greener place with a thriving natural environment and clean air, where communities and infrastructure are sustainable and climate resilient.**
- **People: A place where children are given the best start in life, are able to exceed expectations and where everyone is able to live a healthy, happy and active life within thriving supportive communities, supported by the services they need.**

To what extent do you agree with the Homes, Spaces, Places Vision for Tameside?

Agree

Please give a reason for your answer.

We write on behalf of Lidl Great Britain Limited ('Lidl'), in response to the Regulation 18 consultation on the Tameside's Homes, Spaces, Places (HSP) Options and Preferences Plan Consultation.

Lidl is a substantial and growing presence in the UK convenience retail market, with over 980 stores currently trading and more than 35,000 employees. The business is investing significantly in the UK, including £500 million this financial year as part of its ongoing expansion programme. Lidl is actively delivering new stores nationwide to meet its objective of operating 1,000 stores across the UK in the near future.

Lidl's stores bring a wide range of benefits to the communities they serve. These include:

- Providing high quality products at the lowest possible prices;
- Delivering a modern and convenient shopping experience for local residents;
- Improving customer choice in the areas where they trade;
- Constructing buildings of sustainable, high-quality design with well-integrated landscaping; and
- Creating around 40 new jobs per store, aligned with the Living Wage Foundation rate for all eligible employees, and without the use of zero-hour contracts.

Lidl has a significant interest in bringing forward new stores within Tameside Metropolitan Borough Council Local Authority Area and on this basis, it wishes to ensure that the emerging HSP Development Plan facilitates sustainable retail investment and aligns with national planning policy.

Lidl welcomes the preparation of the HSP Development Plan and support the Council's intention to provide a sound and effective planning framework. However, they wish to make representations on several key policy matters, which it is considered require further refinement to ensure the Plan is positively prepared, justified, effective, and consistent with national policy as set out in the National Planning Policy Framework (NPPF, 2024).

If you think there should be alternative wording for the Vision, please detail your proposed wording below.

STRATEGIC OBJECTIVES

To what extent do you agree with the Homes, Spaces, Places strategic objectives?

Homes: To ensure that new housing provides a range of suitable and affordable homes to meet residents' needs, whilst making efficient use of land.

Strongly agree

Jobs: To enable all residents to share in the benefits of economic growth

Strongly agree

Centres: To support the borough's centres to thrive, be vibrant and attractive and safe spaces where people choose to spend time.

Strongly agree

Travel: To enable everyone to travel safely, conveniently and reduce congestion.

Strongly agree

Places: To deliver development that makes a positive contribution to the character, heritage and identity of Tameside.

Strongly agree

Environment: To ensure that new development responds positively to climate change and ecologically sensitive locations.

Strongly agree

People: To reduce health inequalities, improve health outcomes and enable the provision of services and infrastructure to support new and existing communities.

Strongly agree

Please give a reason for the choices you provided above.

If you think there should be alternative strategic objectives to those suggested, please detail these below.

SPATIAL FRAMEWORK

To what extent do you agree with Policy approach HSP S1: Overall Spatial Strategy?

Agree

Please give a reason for your answer.

If you think there are any reasonable alternatives to Policy approach HSP S1, please detail these below.

To what extent do you agree with Policy approach HSP S2: Neighbourhood Spatial Policies?

Agree

Please give a reason for your answer.

If you think there are any reasonable alternatives to Policy approach HSP S2, please detail these below.

If you have any further comments on the Spatial Framework, please provide them below.

CENTRES

To what extent do you agree with Policy approach HSP C1: Network, Hierarchy and Designation of Centres?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP C2: Primary Shopping Areas?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP C3: Local Shopping Areas and Parades?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP C4: Development Involving Retail and Leisure Uses?

Disagree

Please give a reason for your answer.

As currently drafted, the policy states:

“1. The Council proposes for retail and leisure developments that are planned outside of the borough’s designated centres, that an impact assessment be required where development is over the following locally set gross floorspace thresholds:

- a. Ashton-under-Lyne 1,750sqm
- b. Denton and Hyde 1,250sqm
- c. Droylsden, Stalybridge and Hattersley 750sqm
- d. Mossley Local Centre 500sqm”

The drafted policy proposes a retail impact assessment threshold based on the nature of specific centres. This approach is considered to be overly restrictive and inconsistent with Paragraph 94 of the NPPF, which establishes a default threshold of 2,500 square metres.

Additionally, the thresholds identified in the draft policy appear to apply uniformly across all types of retail development, including convenience retail, comparison retail, food retail and non-food retail. However, the impacts associated with different forms of retail are not equal. It is therefore considered appropriate for the policy to distinguish between food and non-food retail, rather than applying a single blanket threshold across the board.

It is Lidl’s view that the national threshold of 2,500 square metres should be adopted for food retail development in any location across Tameside Borough.

Over the past 10 to 20 years, the food retail sector has undergone a significant shift. The majority of food shopping is now undertaken in mid to large format foodstores, many of which are located outside of town centres. These formats are often unsuited to central locations due to their size, parking requirements, and catchment-driven footfall patterns. As a result, the primary impact of new foodstore development tends to fall on existing edge or out-of-centre facilities, rather than on retailers trading within defined town centres.

Given this context, the risk of significant adverse impacts arising from a new foodstore of less than 2,500 square metres in an edge or out-of-centre location is generally considered to be low. The adoption of the 2,500 square metre threshold would still provide an appropriate safeguard against larger format schemes that may have a greater potential to harm town centre vitality, while ensuring that smaller, well-located proposals are not subject to disproportionate policy hurdles.

The practice of adopting differentiated thresholds for food and non-food retail is well established across the country. It is common for local authorities to adopt the national default threshold set out in the NPPF, particularly in the context of food

retail. On this basis, Lidl considers the current draft of Policy C4 to be overly cautious and misaligned with both market realities and national guidance.

Lidl therefore, requests that the policy be amended to introduce a specific threshold for food retail development, set at 2,500 square metres, in line with the NPPF. This would ensure the policy is both proportionate and effective, supporting sustainable growth while continuing to protect the function and viability of defined centres.

To what extent do you agree with Policy approach HSP C5: Markets?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP C6: Healthier Food Environments

Agree

Please give a reason for your answer.

If you have any further comments on the Centres chapter of the plan, please provide them below.

Paragraph 124 of the NPPF requires that:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”

This includes meeting the need for additional retail development in areas where there is currently a deficiency.

It is noted that at present, the Tameside Retail Study, which forms the evidence base to the HSP Development Plan Consultation Document, was prepared by HollisVincent in July 2017. This document is now 8 years old and is considered to be out of date, given that the retail market has moved on significantly since it was prepared.

Evidence supporting a Local Plan should be up to date and is crucial in creating a sound Plan.

Before any new Development Plan is adopted, a new Retail Study should be prepared. Once this document is prepared, it is necessary to consider whether additional retail sites need to be allocated to meet any additional retail need that is identified.

This must be approached in the same way as new housing of new employment space would be planned for through the Plan process.

Unless this is done, the Plan cannot be considered sound.

ENVIRONMENT

To what extent do you agree with Policy approach HSP E1: Renewable Energy Opportunities?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP E2: Critical Drainage and Water Demand?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP E3: Biodiversity?

Agree

Please give a reason for your answer.

If you have any further comments on the Environment chapter of the plan, please provide them below.

HOMES

To what extent do you agree with Policy approach HSP H1: Housing Type, Mix, Tenure and Affordability?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP H2: Houses in Multiple Occupation (HMO)?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP H3: Gypsy, Traveller and Travelling Show-People?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP H4: Back Land and Garden Development?

Agree

Please give a reason for your answer.

If you have any further comments on the Homes chapter of the plan, please provide them below.

JOBS

To what extent do you agree with Policy approach HSP J1: Existing Employment Areas?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP J2: New Employment Development?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP J3: Assessing the Loss of Employment Land or Accommodation?

Disagree

Please give a reason for your answer.

The draft HSP Development Plan proposes that developments which seek to bring forward non-traditional employment uses on designated employment land will need to be supported by a marketing exercise.

The marketing exercise would need to clearly set out:

- a. why the land or premises are no longer suitable for employment use,
- b. why it's not possible to retain or replace existing business occupiers,
- c. detailed consideration of the potential for refurbishment or redevelopment,

d. a thorough marketing exercise for employment use for a period of not less than 12 months, and e. a detailed assessment of the impact of the proposed loss on the economic health of the wider employment area.”

For the purposes of this policy, it is outlined within the justification that non-employment uses are considered to be any use other than the following:

“Egi (Office),

Egii (Research and Development,

Egiii (Light Industrial),

B2 (General Industrial),

B8 (Storage or distribution)

Sui Generis commercial uses, assessed on a case by case basis, with similar characteristics to industrial and warehousing uses”

In terms of the use classes, the approach adopted must be consistent with the Government’s intention to allow greater flexibility in land use planning, particularly following the introduction of Class E to the Use Class Order.

Further to Use Class E (Commercial, Business and Service) being introduced in September 2020, it is clear that the Government regards Class E uses as employment generating economic uses. In many cases, Class E uses have the propensity to create more jobs and bring greater economic benefits than a Class B use of comparable size. There is therefore, sense and logic in grouping Class E uses with Class B uses.

As set out above, Lidl creates around 40 new jobs per store, aligned with the Living Wage Foundation rate for all eligible employees, and without the use of zero-hour contracts. Henceforth, it is evident Lidl stores can create a significant contribution to job creation across Tameside borough.

On this basis, Lidl suggests that all Class E uses should be explicitly supported within Strategic Employment Areas and on employment sites, alongside B2 and B8 uses, as they are widely acknowledged to be employment-generating.

It is also considered that any requirement for marketing evidence should be removed where the proposed use contributes positively to economic development.

The requirement for marketing evidence in itself, is also considered to be overly onerous and unnecessary. It is Lidl’s view that the requirement for marketing evidence should be removed, or as a minimum reduced to a 6 month period, and that a better and more effective approach would be to require viability evidence to be submitted.

It is Lidl’s view that the policy should be amended on this basis.

To what extent do you agree with Policy approach HSP J4: The Visitor Economy?

Agree

Please give a reason for your answer.

If you have any further comments on the Jobs chapter of the plan, please provide them below.

Planning for Retail Needs

Paragraph 124 of the NPPF requires that:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.”

This includes meeting the need for additional retail development in areas where there is currently a deficiency.

It is noted that at present, the Tameside Retail Study, which forms the evidence base to the HSP Development Plan Consultation Document, was prepared by HollisVincent in July 2017. This document is now 8 years old and is considered to be out of date, given that the retail market has moved on significantly since it was prepared.

Evidence supporting a Local Plan should be up to date and is crucial in creating a sound Plan.

Before any new Development Plan is adopted, a new Retail Study should be prepared. Once this document is prepared, it is necessary to consider whether additional retail sites need to be allocated to meet any additional retail need that is identified.

This must be approached in the same way as new housing of new employment space would be planned for through the Plan process.

Unless this is done, the Plan cannot be considered sound.

PEOPLE

To what extent do you agree with Policy approach HSP PE1: Development and Healthier Environments?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PE2: Publicly Accessible Green Spaces?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PE3: Green Space Standards?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PE4: Strategic Recreation and Countryside Access?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PE5: Outdoor Sport and Recreational Facilities?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PE6: Peak District National Park?

Agree

Please give a reason for your answer.

If you have any further comments on the People chapter of the plan, please provide them below.

TRAVEL

To what extent do you agree with Policy approach HSP T1: General Approach?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP T2: Trunk Road Developments?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP T3: Rail Infrastructure?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP T4: Rapid Transit?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP T5: Facilities for Buses?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP T6: Walking, Wheeling and Cycling?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP T7: Freight Movement and Deliveries?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP T8: Parking?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP T9: EV Charging Infrastructure?

Agree

Please give a reason for your answer.

If you have any further comments on the Travel chapter of the plan, please provide them below.

PLACES

To what extent do you agree with Policy approach HSP PL1: Archaeology and Scheduled Monuments?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL2: Listed Buildings - Alternative Uses, Additions, Demolition and Development Within Their Setting?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL3: Conservation Areas - Managing Development Within or Adjoining?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL4: Historic Parks and Gardens - Managing Development?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL5: Designated Heritage Assets - Energy Efficiency and Renewable Energy Generation?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL6: Designated Heritage Assets and Enabling Development?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL7: Non-Designated Heritage Assets?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL8: Landscapes, Townscape and Urban Form?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL9: Design and Amenity?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL10: Design of All Types of New Residential Development?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL11: Design of Residential Additions, Alterations and Extensions?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL12: Design of Employment Sites?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL13: Design within Centres, Retail and Leisure Developments?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL14: Design of Commercial Frontages?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL15: Outdoor Sports, Recreation and Play Space?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL16: Design and Enhancement of the Waterside?

Agree

Please give a reason for your answer.

To what extent do you agree with Policy approach HSP PL17: Design of Public Realm and Urban Spaces?

Agree

Please give a reason for your answer. If there are any amendments or alternative policy approaches you would like to propose, please detail these in your response.

If you have any further comments on the Places chapter of the plan, please provide them below.

POLICIES MAP AND INTEGRATED ASSESSMENT

A policies map has been published which shows the areas of land that relate to specific policies in this plan at this stage in the process. Future versions of Homes, Spaces, Places will have specific allocations and further designations of land linked to policies. An updated policies map will be produced at that time to identify these.

If you have any comments on the Policies Map, please provide these below.

An Integrated Assessment Report has been produced to accompany this plan. The Integrated Assessment identifies the potential sustainability impacts of implementing the Homes, Spaces, Places Plan.

Do you consider that the Integrated Assessment has adequately assessed the potential environmental, social, and economic impacts of the proposed policy approaches and strategies within the Plan?

Are there any sections of the Integrated Assessment that require further explanation or clarification?