

PLANNING, REGENERATION + INFRASTRUCTURE

COVENTRY RETAIL & CENTRES STUDY

STAGE 1: ISSUES & OPTIONS
TOPIC PAPER

FINAL REPORT
ACCESSIBLE VERSION
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APPENDIX 1: PLAN OF CENTRES IN COVENTRY CITY

EXECUTIVE SUMMARY

- i. Coventry City Council is currently in the early stages of updating the existing adopted Coventry City Local Plan ('Local Plan') and the City Centre Area Action Plan. This Study will provide the updated robust and sound evidence base that is needed to help formulate strategies and policies specific to retail, other main town centre uses that will be contained in these policy documents.
- ii. The study is being completed across two stages. This Topic Paper forms Stage 1 of the study and will provide the Council with an early indication on possible changes to adopted Local Plan policies that support growth for the city centre and district centres and manage town centre uses within and outside the defined centres.
- iii. Stage 2 of the study will follow this first stage Topic Paper and will supersede the findings of the Coventry Shopping and Centres Study 2014, which informed town centre policies within the adopted Local Plan.

Town Centre Planning Policy Context

- iv. Current policies for town centre uses and supporting economic growth for Coventry's centres is set out in the Local Plan and relevant supplementary planning documents. Separate policy guidance is provided for the city centre (Coventry City Area Action Plan) and Willenhall (Willenhall Neighbourhood Development Plan). Further guidance is provided at national level including within the National Planning Policy Framework ('NPPF') and the Planning Practice Guidance.
- v. The Government's reforms to national planning policy and planning legislation over the last 3 years has promoted market led approach to supporting new homes and encouraging diversification of commercial uses in town centre. For example, greater flexibility for commercial town centre uses through the creation of Class E within the amended Use Class Order. Further amendment to Permitted Development Rights ('PDR') legislation now allows greater opportunity to support the conversion of commercial town centre buildings/ units to residential use. Further clarity on the use of Article 4 Directions to restrict PDR is provided in the NPPF, which limits the scope of their application.

Retail and Leisure Market Trends Overview

- vi. A review on market trends affecting the retail and leisure sectors shows variances in how the sectors have performed over the past number of years. Almost all businesses have been severely impacted by the COVID-19 pandemic, which accelerated the decline of businesses that were already in a vulnerable position pre-pandemic, particularly brands that had failed to modernise or keep up with changing customer demands, and businesses that were struggling to compete with online competitors. Businesses are now being hit by new economic challenges brought about by the energy and cost of living crisis, and lingering impacts from Brexit. These pressures have manifested in the form of rising operational and supply costs, labour shortages, and a squeeze on household expenditure. As a result, town centre businesses are in a vulnerable position, particularly those that have been carrying debt accumulated during the pandemic.
- vii. National trends on retail expenditure show a slowdown in the annual rate of growth in recent years and for future years and at a rate much lower than what was predicted before the pandemic. At the same time, online retail sales are gaining further market share of overall retail sales. A jump in online market share in recent years was a consequence of the pandemic where out of necessity; online shopping reached a broader customer base. As a result bricks and mortar retail businesses are working harder to remain viable. These factors will ultimately influence capacity to support new retail floorspace across the district and also demand from the market for physical stores in Coventry's centres.

- viii. The market trends review highlights the need to ensure new Local Plan policies will help steer investment and footfall to Coventry's towns and support existing and new businesses.

Socio Economic Profile Snapshot

- ix. Coventry's population was estimated at 345,300 persons in 2021 and almost two thirds of the population are within the working age, which higher than the regional and national average. Those in work are predominantly working in public health, education, retail, administrative/ support and manufacturing. The proportion of working age claimants in Coventry is higher than the regional and national average.
- x. The district is not particularly affluent which is evident when we compare average retail spend per head, which shows that average spend for Coventry is lower than regional and national averages. A review of the district's consumer profile by household indicates that most households are generating modest to average incomes. These factors will influence the type of retail and leisure brands that seek space in Coventry, particularly the city centre.

Coventry City Centre Audit

- xi. An audit of the city centre shows that retail representation (as a proportion of all town centre outlets) is below the expected average for town centres. This is likely to be influenced by the proximity of larger or stronger performing centres, such as Birmingham, Leamington Spa, and out of centre retail parks (within and outside the district). In contrast, the city centre has an over-representation of leisure service and financial and business service. Vacancies are high in the city centre, which may be an indicator that retail/ commercial floorspace supply is not matched by market demand.
- xii. Generally, the city centre's retail offer caters to budget to mid-market brands, with notable retail anchors including Marks and Spencer, Primark, Wilko, New Look, H&M, Home Bargains, amongst others. The city centre has a reasonably good range of food and beverage operators, particularly within the casual dining and fast food sectors, with key brands such as Pizza Express, Five Guys, Wagamama, Nandos and Zizzi. Other leisure anchors include Odeon Cinema, Premier Inn hotel, and Pure Gym.
- xiii. The city centre has benefited from investment, notably funding for investment in arts and cultural assets which was awarded to support Coventry's UK City of Culture (2021) status. In addition, the city centre will benefit from a number of major regeneration projects, such as the City Centre South and Friargate, which will help boost the city's profile.

Major District Centres Audit

- xiv. An audit of Coventry's major district centres shows variances in their role, physical form, and representation of town centre uses. Two of the three major district centres, Arena Park and Cannon Park for example, trade akin to a retail park and shopping centre, respectively and are mostly supported by high street retail and leisure brands trading from large units. Vacancies are low in both centre, which will reflect the centre's likely appeal to operators and catchment reach due to their proximity major transport routes. In contrast, Ball Hill takes the form of a traditional town centre and offers a higher number of smaller commercial units. The centre is more orientated towards independent commercial offer and budget retail. Notably, the centre does not have a foodstore anchor, which is available in Coventry's other two major district centres.
- xv. Coventry's local population is supported by eight District Centres. Again, there are variances in their form, scale, and retail orientation. Of note, Brandon Road includes Warwickshire Shopping Park and like Arena Park and Cannon Park, primarily functions as a retail shopping park with major retail multiples. As a result, it will draw a wide catchment and perform differently to a traditional 'district centre'.

- xvi. Brade Drive is a smaller district centre but is located immediately south of Walsgrave Retail Park and is expected serve an ancillary retail and service function to the retail park. Bell Green, Daventry Road, and Earlsdon are the largest of the eight district centres and generally support a balanced mix of town centre retail and services. Retail offer is lower than the national average for town centres, but this is to be expected for district centres where service uses typically have a more prominent role.
- xvii. Coventry's smaller district centres, including Foleshill, Jardine Crescent and Jubilee Crescent are more convenience retail and service use orientated. These centres will perform a more day to day commercial function and their catchments will mainly serve the needs of residents living in the immediate area.

Preliminary Policy Advice Recommendations

- xviii. Taking account of the evidence gathered from the policy review, market trends review, and high level audits of Coventry's centres we consider at this stage of the study that the new Local Plan policies will need to take account of the following:
- 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 can no 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.

Next step: Stage 2: Retail & Town Centre Uses Assessment

- xix. The next step in this study will be the preparation of the Retail & Town Centre Uses Assessment, which will provide a comprehensive update of the Council's existing town centre policy evidence base.
- xx. Stage 2 will quantify the need for new town centre uses across Coventry's centres, with particular focus on retail and commercial leisure uses. The outputs are assessed against market demand indicators to obtain a true picture of viability for new town centre uses alongside a review of potential sites to support need. Final recommendations will be provided on town centre policies based on new evidence.

1. INTRODUCTION

- 1.1 Lambert Smith Hampton (LSH) was instructed by Coventry City Council ('the Council') in December 2022 to prepare the Coventry Retail & Centres Study 2023 ('the Study'). The Study will specifically update the Council's current town centre evidence, the Coventry City Wide Shopping and Centres Study 2014 Update ('2014 SCS').
- 1.2 It is the Council's intention to update the existing Coventry City Local Plan and City Centre Area Action Plan, both of which are 5 years old. This Study will provide the updated robust and sound evidence base that is needed to help formulate strategies and policies specific to retail, other main town centre uses that will be contained in these policy documents.
- 1.3 The study will form two stages:
 - **Stage 1: Issues & Options Topic Paper** – involves the preparation of this Topic Paper, the objective of which is to provide the Council with an early indication on possible changes to adopted policies that support growth for the city centre and district centres and manage town centre uses within and outside the defined centres.
 - **Stage 2: Retail & Town Centre Uses Assessment** – follows on from the findings of Stage 2 but involves the production of new comprehensive evidence base that will quantify the need for new town centre uses across Coventry's centres, with particular focus on retail and commercial leisure uses. The outputs are assessed against market demand indicators to obtain a true picture of viability for new town centre uses alongside a review of potential sites to support need. Final recommendations will be provided on town centre policies based on new evidence.
- 1.4 Since the 2014 SCS was prepared the UK has experienced major economic and social events (e.g. COVID-19, energy and cost of living crisis, inflation and a rise in interest rates) that have impacted on how we shop, work and use our town centres. As such, there is a need to review the town centre and employment evidence to ensure that recommendations contained within the studies are still relevant and reflect the current economic situation and align with new socio economic forecasts and changes affecting town centre and employment markets.
- 1.5 As such, the new study will take account of current and predicted market trends, and the recent impact of the pandemic on town centres and high streets as places to shop, live, work, study and visit for a wide range of uses and activities, as well as the changing demands for employment land. It will also be carried out in accordance with current policy and guidance pertaining to retail and town centre uses, and employment land at the national and local level, including the National Policy Framework (NPPF) and National Planning Practice Guidance (PPG).
- 1.6 This Stage 1: Topic Paper is structured as follows:
 - Section 2- provides an overview of national and adopted local development plan policies that support and manage town centre uses within and outside of defined centres.
 - Section 3 – discusses national market trends affecting the retail and leisure sectors and how these trends are translating to Coventry.
 - Section 4 – provides an overview of Coventry's socio economic and consumer profile.
 - Section 5 – sets out the findings of audits of the city centre and Coventry's 12 district centres, which focuses on the latest available evidence of commercial town centre uses and how the mix of commercial uses has changed since 2014.
 - Section 6 – provides an indication of what policies within the adopted Local Plan and City Area Action plan are likely to require an update and new policies that will need to be considered.
- 1.7 It should be noted that the recommendations presented in this Stage 1 Topic Paper may be subject to change the comprehensive Stage 2: Evidence Study is undertaken. However, the findings will provide an early indication on how market trends and changes to the structure of Coventry's centre's is likely to guide Stage 2 policy recommendations.

2. PLANNING POLICY OVERVIEW

- 2.1 This section provides a review of national and development plan policies and guidance that pertain to managing and supporting new town centre uses both within and outside of defined centres. The review will also consider the use of Article 4 Directions to manage Permitted Development Rights (PDR), particularly in relation to PDRs that allow the conversion of buildings and units in commercial use to residential use.

NATIONAL PLANNING POLICY & GUIDANCE

National Planning Policy Framework (NPPF)

- 2.2 The NPPF was updated in July 2021 and sets out the Government's planning policies for England. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The NPPF must therefore be considered in plan-making and is a material consideration in planning decisions.
- 2.3 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which is defined as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The Framework (paragraph 11) sets out the Government's view of what the presumption in favour of sustainable development means in practice. For **plan-making**: "*...plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change*" (paragraph 11a).
- 2.4 Chapter 3 ('Plan-Making') of the Framework provides guidance to local authorities on preparing local plans. Paragraph 20 states that policies should set out an overall strategy for the location, scale and quality of development, and make sufficient provision for new sustainable development. It requires that strategic policies should look ahead over a minimum 15 year period from adoption, **except in relation to town centre development** (see below). In preparing development plans, "policies should be underpinned by relevant and up-to-date evidence" (paragraph 31). To ensure the local plans and spatial strategies are relevant they should be reviewed at least once every five years and updated as necessary (paragraph 33).
- 2.5 **Chapter 7 ('Ensuring the vitality of town centres')** provides guidance on plan-making and decision-taking for retail and other town centre uses. Paragraph 86 states that "planning policies and decisions should support the role that town centres play at the heart of local communities", and sets out criteria that local authorities should consider when preparing planning policies. These include: (a) defining a network and hierarchy of centres; (b) defining the extent of town centres and Primary Shopping Areas (PSAs); (c) retaining and enhancing existing markets; and (d) allocating a range of suitable sites in town centres to meet the sales and type of development likely to be needed, "***looking at least ten years ahead***".
- 2.6 Paragraphs 87-91 specifically set out the requirement to apply the sequential and impact tests to determine applications for new retail, leisure and main town centres that are neither in an existing centre, nor in accordance with an up-to-date development plan.
- 2.7 Other Chapters in the NPPF are also relevant to the preparation of this study, and to the Council's plan-making and decision-taking policies for its network and hierarchy of centres. For example, Chapter 8 ('**Promoting healthy and safe communities**') sets out the need to achieve healthy, inclusive and safe places; including the need to plan positively for the provision and use of shared spaces, community facilities (such as local shops) and other local services to enhance the sustainability of communities and residential environments (paragraph 93a).

Planning Practice Guidance (PPG)

The Planning Practice Guidance (PPG) provides specific guidance on plan-making and decision taking for retail, leisure and town centre uses, including guidance on Permitted Development Rights (PDR), Article 4 Directions, and the new Use Classes Order ('UCO') that came into effect on 1st September 2020 (discussed later in this section). The Guidance supports the policies and provisions of the NPPF; placing significant weight on the development of positive plan-led visions and strategies for town centres.

- 2.8 In terms of planning for town centres, the PPG states that a wide range of complementary uses can, if suitably located, help to support the vitality and viability of town centres. These include residential, employment, office, commercial, leisure/entertainment, healthcare and educational development. Evening and night-time activities also have the potential to increase economic activity within town centres and provide additional employment opportunities.
- 2.9 The PPG (paragraph 004) sets out the importance of evidence-based strategies and visions for town centres to help establish their role and function over the plan period, the need for new retail, leisure and town centre uses, and other interventions. However, given the uncertainty in forecasting long term retail trends and consumer behaviour, the PPG states that forecasts ***"...may need to focus on a limited period (such as the next five years) but will also need to take the lifetime of the plan into account and be regularly reviewed"***. In those cases where development cannot be accommodated in town centres, the PPG requires planning authorities to plan positively to identify the most appropriate alternative strategy for meeting the identified need, having regard to the sequential and impact tests. The PPG also sets out several Key Performance Indicators (KPIs) that ***"may be relevant in assessing the health of town centres, and planning for their future"***.

Reform of Use Classes Order and Permitted Development Rights

- 2.10 The Government has issued a series of reforms to the planning system at the time of preparing this study. The reforms principally relate to Permitted Development Rights (PDR) and the Use Classes Order (The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020/757 was laid before Parliament on 21st July 2020 and amended the Town and Country Planning (Use Classes) Order 1987), alongside the Government's White Paper "Planning for the Future" (published in August 2020) and the 2021 Planning Reform Bill.
- 2.11 The new Use Classes Order (UCO) came into effect from 1 September 2020 and is relevant to the preparation of this study and the Council's plan-making and decision-taking on new retail, leisure and town centre uses. The new UCO amended and revoked a number of use classes under the 1987 Order, and has replaced them with much broader use classes. In summary, the main reforms introduced by the new UCO include:
- a new Class E (commercial, business and service uses): which subsumes the former Use Classes A1 (shops), A2 (financial and professional services) and A3 (restaurants and cafés). It also incorporates: the former Class B1 (commercial, business and service uses), comprising office, research and development and light industry; Class D1 (non-residential institutions) in part, comprising medical or health services, clinics, crèches, day nurseries and day centres; and Class D2 (assembly and leisure) in part, comprising gyms or areas for indoor recreation.
 - a new Class F1 (learning and non-residential institutions): which includes some of the former uses under Class D1 (non-residential institutions), including museums, public libraries, art galleries, schools, and places of worship.
 - a new Class F2 (local community uses): which comprises (former Class A1) shops defined as being ***"...not more than 280 sqm mostly selling essential goods, including food, and at least 1km from another similar shop"***. This Use Class also includes former Class D2 (assembly and

leisure), such as meeting places/halls, indoor/outdoor swimming baths, skating rinks, and outdoor sport and recreation.

- an extension to the Sui Generis uses (which fall outside the specified use classes) to include the former Use Classes A4 (pubs and drinking establishments) and A5 (hot food takeaways). It also incorporates some uses previously classified under D2 (assembly and leisure), including cinemas, concert halls, live music venues, bingo and dance halls.

- 2.12 The Government also consulted on a variety of changes to PDR in December 2020, including the Class E to Class C3 (residential) PDR. This PDR replaces the two existing commercial to residential PDRs under Class O (office to residential) and Class M (conversion of shops, financial services, betting offices and pay day loan or mixed uses to residential). The Town and Country Planning (General Permitted Development etc.) (England) (Amendment) Order 2021 introducing the new PDR under new Class MA will be introduced on 1 August 2021, and will be subject to prior approval applications. It does contain some conditions and limitations informed by the consultation responses. For example, it only applies to buildings that have been vacant for a least three continuous months, to help protect existing businesses. It does not apply to buildings with a cumulative floorspace of more than 1,500 sqm or to listed buildings, but will apply in Conservation Areas.
- 2.13 In launching the reforms the Government announced that the regulations will give “...greater freedom for buildings and land in our town centres to change use without planning permission and create new homes from the regeneration of vacant and redundant buildings” (<https://www.gov.uk/government/news/pm-build-build-build>). These changes are relevant to this study. It should be noted that reference is still made throughout the study to classifications defined by the previous 1987 UCO.

Article 4 Directions

- 2.14 Article 4 Directions are a tool used by local authorities to remove national permitted development rights, if warranted and supported by robust evidence.
- 2.15 The Government supports the use of Article 4 Directions in a “highly targeted way” to protect core high street areas whilst not restricting the ability for much needed housing to be delivered.
- 2.16 The July 2021 update to the NPPF provides more detail on Article 4 Directions in paragraph 53. Of relevance, the NPPF states that Article 4 Directions should only be used to “avoid wholly unacceptable adverse impacts” such as “the loss of the essential core of a primary shopping area which would seriously undermine its vitality and viability”, but discourages against the use of Article 4
- 2.17 Directions across the entirety of a town centre. The NPPF also advocates the use of Article 4 Directions to protect the local amenity or well-being of an area, particularly where there could be a potential loss of local facilities.
- 2.18 A provision is stated in paragraph 57 that any case made for Article 4 Directions must be based on robust evidence and should apply to the smallest area possible. This means Local Planning Authorities will need to be very careful in where Article 4 Directions are used, that they are necessary and there is a strong evidence base to underpin them.

LOCAL PLAN CONTEXT

- 2.19 Development Plan Documents (DPDs) are defined in the Local Plan Regulations 2012 (as amended). The DPDs guide the development and use of land, allocate sites for particular development and provide strategic and development management policies to support and manage growth. The adopted DPDs for Coventry City Council are:
- Coventry Local Plan (2017)
 - City Centre Area Action Plan (2017)
 - Willenhall Neighbourhood Plan (2018)

2.20 The main provisions and policies relevant to this study and subject to review are summarised below.

Coventry Local Plan (2017)

- 2.21 **Policy DS1 ‘Overall Development Needs’** (part 1c) states that over the plan period 84,900 sqm gross retail based floorspace (across use classes A1-A5 (including bulky goods)) and 21,900 sqm gross convenience floorspace by 2031, of which at least 70,000 sqm is to be allocated to Coventry City Centre.
- 2.22 Chapter 5 of the Local Plan covers policies relating to **‘Retail and Town Centre Use’** and the introduction to the chapter states how the role and function of town centres is changing and the need to diversify and make wider provision to support their community. Table 5.1 expands on Policy DS1 and highlights the full extent of retail need identified for Coventry over the plan period. In relation to the city centre element, this will be delivered through the City Centre Area Action Plan, which is discussed later in this section.
- 2.23 **Policy R1 ‘Delivering Retail Growth’** included details of specific sites allocated to support the provision of retail floor space across Coventry. The policy also highlights how the comprehensive redevelopment of the Riley Square element of the Bell Green District Centre will be supported in accordance with the Masterplan for the area. There is a presumption against further retail development at Arena Park Major District Centre. However, new retail floorspace will be considered where it is demonstrated that there will be no significant adverse impact on the city centre.
- 2.24 The supporting text of **Policy R2 ‘Coventry City Centre – Development Strategy’** provides context on the performance of Coventry City Centre as the main comparison shopping destination and the main focus for employment, leisure, entertainment and cultural activities. However, the city centre has not experienced the same level of investment as Birmingham, Solihull and Leicester. The Local Plan highlights how the city centre is ranked behind these competing centres in retail investment indexes¹. The supporting text states that there is a clear need to invest in the city centre’s retail offer to strengthen its role at the top of the City district’s centre hierarchy. Although the wider city centre boundary is shown on the Policies Map, the Primary Shopping Area and primary and secondary frontages will be designated through the Coventry City Area Action Plan.
- 2.25 The policy itself states that the city will continue to be developed and regenerated by (*inter alia*):
- Enhancement of its retail and leisure offer to strengthens the city’s sub-regional role
 - A connected public realm including public squares
 - Accessibility for all
 - Continuing to develop a vibrant and attractive night time economy
- 2.26 **Policy R3 ‘The Network of Centres’** identifies the Major District Centres, District Centres and Local Centres, which will be the main locations for new shops, and other Main Town Centre and community facilities, which do not serve a city-wide catchment. All centres should have a balance between these uses and any proposals that reduce the concentration of A-class within a centre below 51% will not be approved.
- 2.27 The Major District Centres will complement and not compete with the city centre. Development should be of a scale which would not impact negatively on the city centre and support a mix of bulk convenience and comparison, social, community and leisure uses (including hotels) and officers.

¹ Coventry City Centre is ranked 58th on the national ladder (according to the venue score index), with Leicester ranked 17th and Birmingham ranked 3rd.

2.28 The four 'Major District Centre' comprise:

- Arena Park
- Brandon Road
- Cannon Park
- Eastern Green

2.29 District Centres include:

- Ball Hill
- Bell Green
- Brade Drive
- Daventry Road
- Earlsdon
- Foleshill
- Jardine Crescent
- Jubilee Crescent

2.30 Like Major District Centres, 'District Centres' contain a scale of development that will not impact negatively on the higher order centres by primarily supporting main convenience shopping, an element of comparison, social, community and small scale office uses.

2.31 **Policy R4 'Out of Centre Proposals'** states that for retail and main town centre uses proposals will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test. The supporting text states that the Council have undertaken a thorough review of existing retail provisions to help understand what sort of proposals would warrant consideration through a Sequential Assessment and Impact Test.

2.32 The Sequential Assessment should be prepared in accordance with national guidance and should have regard to the centres hierarchy set out in Policy R3. Well-connected and accessible 'edge of centre' locations (within 300m of a centre boundary) should be considered where in-centre options are exhausted.

2.33 The supporting text clarifies that due to vacancy rates and centres remaining under pressure, there is a need to introduce a threshold for impact tests below that identified in the NPPF. Therefore, Part 3a of Policy R4 states that an Impact Test will be required for all retail and main town centres uses proposals outside a defined centre that exceed 1,000 sqm (gross) floorspace and in accordance with national guidance. Catchment areas for Sequential Assessments and Impact Tests will be considered on a case-by-case basis to reflect the specific proposals being considered.

2.34 **Policy R5 'Retail Frontages and Ground Floor Units in defined centres'** states that non-A class uses will normally be permitted on ground floor units within defined centres. However, proposals must demonstrate that: the primary retail function is not undermined (Policy R3); the uses make a positive contribution to the role, vitality and viability of the centre; and the use is compatible with other Plan policies. Part 2 states that the impact of a proposal on the primary retail function of a centre will be determined on the location and prominence of the unit within the relevant frontage. The supporting text confirms that there are no plans to designate primary or secondary retail frontages with the exception of the city centre where shopping frontages remain important to identify and will be managed through the City Centre AAP.

2.35 **Policy R6 'Restaurants, Bars and Hot Food Takeaways'** states that these outlets should be located within defined centres and normally discouraged outside those locations. Proposals within defined centres will be permitted provided they do not significantly harm the amenity of nearby

residents or highways. In addition, proposals should not result in harmful cumulative impacts associated with existing or consented proposed outlets, and should be in accordance with the emerging Hot Food Takeaway Supplementary Planning Document and compatible with other Plan Policies.

Coventry City Council City Area Action Plan (2017)

- 2.36 The Area Action Plan was developed in parallel to the Local Plan and supports the identification of the city centre as the heart of the city and focal point for new jobs, homes and investment. There is a clear disparity between the size of Coventry City's population and the standard of its city centre retail offer. It re-emphasises the 2014 SCS, the issues around vacant units, relatively low market share and a shortage of higher end retailers, although there are some promising signs with significant investments in new homes, for example. The AAP is to provide the platform from which to regenerate and develop the city centre over the next 15 years and this includes new retail and leisure provisions.
- 2.37 **Policy CC1 'Coventry City Centre – Development Strategy'** states that the city will continue to be development and regenerated by (*inter alia*):
- Enhancement of its retail and leisure offer to strengthens the city's sub-regional role
 - A connected public realm including public squares
 - Accessibility for all
 - Continuing to develop a vibrant and attractive night time economy
- 2.38 Under the heading 'Providing New Retail Floor Space' the AAP refers to 2014 SCS provision of gross new floorspace across Coventry and displays the breakdown of retail needs in Coventry City Centre into short term requirements (to 2021, 2021-2031 and total 2011-2031). In relation to New Leisure, Social and Community Facilities, the supporting text refers again to the 2014 study, suggesting that there is potential for Coventry city to increase its market share of cinema trips and support the provision of a new cinema. In addition, there is capacity to support two new health and fitness clubs and to help diversify and strengthen the centre there will opportunities to provide new social, community or leisure uses.
- 2.39 **Policy CC12 'The Business Area – Friargate'** Part C states that the provision of up to 20,500 sqm of A1-A5 retail based floorspace will be allowed as part of mixed use buildings and to support the creation of active frontages. Any individual unit should not exceed 500 sqm gross and should not be of a scale that would cause inappropriate competition with the Primary Shopping Area.
- 2.40 **Policy CC14 'The Civic Area'** states that other commercial activities (excluding A1 retail) will be supported where they support the provision of active frontages within mixed use developments. The provision of new retail development is unlikely to be supported within the Civic Area. Part G states that the site of the Spire house and Christchurch House is to be allocated for at least 6,500 sqm of new leisure uses, including a swimming pool and fitness suite.
- 2.41 **Policy CC15 'Far Gosford Street Area'** states Far Gosford Street will be regarded as a local centre meaning proposals for local shopping provision will be supported (hot food takeaways will not be permitted).
- 2.42 **Policy CC17 'Leisure and Entertainment Area'** states that Spon Street will be encouraged as a suitable and attractive location for specialist and independent retailers, and that further hot food takeaways (use class A5) will not be permitted in this area. Part C refers to the vacant land between Bond Street, Hill Street and Ryley Street where development of 1,000 sqm of A1-A4 uses will be considered appropriate. The policy also identifies other sites where A1-A4 uses are encouraged.

- 2.43 **Policy CC18: ‘The Primary Shopping Area’** will be the primary focus for all new shopping developments including redevelopment, refurbishment, extension or conversion of buildings for shopping uses. The area is expected to accommodate at least 40,000 sqm of gross new floor space (A1-A5 use class). Opportunities to provide a new purpose built convenience food offer of up to 10,000 sqm within or in close proximity to the PSA will also be encouraged.
- 2.44 **Policy CC19: ‘Primary Shopping Area regeneration – South’** will be promoted for predominantly comparison shopping and will provide for (inter alia):
- an increase of at least 10,000 sqm gross retail floor space
 - A range of shop sizes that reflect market requirements;
 - Complimentary leisure, office and hotel uses as part of upper floors above retail uses
- 2.45 **Policy CC20 ‘Primary Shopping Area regeneration – North’** states that the northern part of the shopping area will be promoted predominantly for comparison retail, that will provide for (inter alia):
- An increase of at least 10,000sqm gross retail floor space
 - A range of shop sizes that reflect market requirements;
 - Associated residential provision of at least 300 homes as part of upper floors above retail uses.
 - Associated leisure, office and hotel uses on upper floors above retail uses.
- 2.46 **Policy CC21 ‘Cathedral Lanes Cathedral Lanes’** (5) will continue to be promoted for a change of use to café and restaurant uses, with such uses encouraged to spill out onto Broadgate Square to help reflect the new public realm.
- 2.47 **Policy CC22 ‘Primary and Secondary Frontages’** states that primary frontages are expected to include a high proportion of retail uses which may include food, drink, clothing and household goods. Where proposals would result in less than 60% of primary frontages being classed as A1 retail then the applicant will be expected to demonstrate exceptional circumstances to justify a change of use. Within secondary frontages, a mix of Class A will be permitted as well as D1, D2 and sui generis uses.
- 2.48 **Policy CC25: ‘Regeneration Areas’** of Bishop Street and Fairfax Street will be primarily promoted for new residential development although a range of other uses will be acceptable including retail and commercial; social, community and leisure uses.

Willenhall Neighbourhood Development Plan 2016-2031 (2018)

- 2.49 The plan states that Willenhall has a Heart of England Cooperative, a small supermarket, market area for car boot sale. The Airport Retail Park is located within the Willenhall Neighbourhood Area, which comprises 102,500 sqft of retail warehousing, anchored by a Curry’s Mega Store and Dunelm Mill. Other occupiers include, Smyth’s Poundland and B&M.

EXISTING TOWN CENTRE POLICY EVIDENCE BASE

The Coventry Shopping and Centres Study (2014)

- 2.50 Town centre related policies contained in the DPD and reviewed above were informed by The Coventry Shopping and Centres Study 2014 (‘2014 SCS’). The study formed part of the evidence base for the adopted Coventry Local Plan and City Centre Area Action Plan and will be superseded by the Stage 2: Retail & Town Centre Uses Assessment.

- 2.51 The 2014 SCS assessed the quantitative need for new retail and commercial leisure floorspace in the City and its centre's over the period 2014 and 2031 and was informed by various evidence including: a household survey to establish shopping and leisure patterns across a defined study area; health check assessments of Coventry's main centres; and an economic assessment of retail and leisure expenditure.
- 2.52 The study indicates that the proportion of convenience goods expenditure within Coventry City is relatively high with the inner catchment area having a retention above 95%. For the outer catchment area, the convenience goods expenditure spent within Coventry ranges from 35.7% to 8.8% and concludes that overall there is a slight deficit in expenditure (-£12.05 million) within Coventry as a whole. The main competitors overall for convenience goods are identified as Bedworth/Nuneaton, Rugby and Kenilworth/Leamington.
- 2.53 Comparison goods expenditure within Coventry City ranges from 86% (Zone 3) to 18.2% in Zone 8. This suggests that while customers carry out food and grocery shopping locally, they are more likely to shop around and travel longer distances to visit larger centres that have more choice. The main competitors overall for comparison goods are similar to convenience goods (Bedworth/Nuneaton, Rugby and Kenilworth/Leamington), although Solihull/Birmingham has a much bigger influence on customers in relation to comparison goods market shares.
- 2.54 The city centre audit summarised Coventry City Centre as providing a reasonable mix of national multiples and independents with strong anchor stores and a thriving evening economy. However, there is a low proportion of comparison retail offer and the city needs investment and regeneration in parts. The strengths and weaknesses of the Major District Centres were:
- Arena Park: has no vacant units which indicates a healthy and viable centre with national multiples and good provision of parking, although the centre functions more as an out of centre retail park.
 - Ball Hill: A reasonable range of lower order shops which serve the day-to-day needs of local residents and is very accessible by public transport. The centre has a poor environmental quality and Walsgrave Road can be busy, creating a barrier for pedestrians.
 - Cannon Park: the centre has a strong anchor store (Tesco) and the purpose built shopping centre benefits shoppers due to the traffic free environment and pedestrians with ease of access and large surface parking provision. Although, the centre has a high proportion of vacancies and only provides limited ancillary service uses.
- 2.55 Turning to the outputs of the retail needs assessment, the floorspace projections are presented in section 6 of the study and identified a need for up to 16,409 sqm of new convenience floorspace 2014-2031.
- 2.56 For comparison goods retail, the study identified a need for 39,779 sqm over the same period. The study also provided an indication on the distribution of identified need for retail floorspace by centre, but subject to change where new floorspace is required to accommodate major urban extensions.
- 2.57 Commercial leisure need was assessed based on a quantitative assessment of need for certain leisure sectors such as cinemas, food and beverage, and gyms. The study identified a need for 12,639 sqm for Class A3/A5 food and beverage services over the period 2014 and 2031.
- 2.58 The study recommendations include prioritising the implementation of the Coventry City South Development; reoccupying vacant retail floorspace; the LPA to set out a vision and strategy for the pattern and hierarchy of centres; and the designation of centre boundaries and primary shopping areas within these boundaries.

Supplementary Planning Documents

- 2.59 SPDs are produced to elaborate on Local Plan policy to provide more detail and help deliver the policies, although they cannot introduce new policy.

- 2.60 The Hot Food Takeaway (2019) SPD provides details of some relevant planning policies and guidance on how to meet Policy R6 (2c) Restaurants, Bars and Hot Food Takeaways and also refers to policies in the CCAAP. The SPD distinguishes the differences between shops, restaurants, drinking establishments and hot food takeaways by Use Class (A1, A3, A4 and A5 respectively). The purpose of the SPD is to recognise the role hot food takeaways play in the economy and the impact they can have on health and wellbeing.

SUMMARY

- 2.61 In summary, national and local plan policy seeks to maintain and grow the vitality and viability of centres over time. This is achieved through various measures such as directing new investment in town centres first and promoting a diverse mix of sustainable uses that meet the needs of all those who live, work, shop and visit centres.
- 2.62 The Local Plan seeks to deliver retail growth in Coventry through a number of regeneration projects such as the comprehensive redevelopment of the Riley Square in Bell Green District Centre. The Local Plan also recognises how Coventry needs to invest in city centre retail and strengthen its role within the hierarchy of competing city centres. This is supported by the Coventry City Area Action Plan, which supports the regeneration of the city centre through a number of major development and investment opportunities.
- 2.63 Due to the evolving nature of planning practice and policy, there is a need for the Local Plan to be updated to account for new use classes and more up-to-date information informed by recent evidence base. A review of town centre policies is considered in Section 6 and elaborates more on how relevant policies are based on an up to date evidence base, whilst allowing sufficient flexibility to allow town centres to adjust to market changes.

3. RETAIL MARKET TRENDS OVERVIEW

3.1 This section summarises some of the key economic, consumer and property market trends that have driven the changes in the retail and leisure sectors over the last decade, and which will continue to shape change in the future. It should be noted at the outset that this section was written at the time when the UK economy has been on the brink of a recession and in the midst of an energy and cost of living crisis. The Bank of England's response to rising inflation led to a rise in interest rates twice in one year, which is impacting on household expenditure due to the rising costs of goods and energy. A further rise in interest rates is expected in March, which will result in a further squeeze on household expenditure. As a result, forecasts and trends discussed in this section are likely to change in the short term, particularly in relation to expenditure growth on retail goods and on leisure activities.

KEY METRICS AFFECTING THE RETAIL ECONOMY

3.2 The following provides a summary of key economic metrics that are influencing the retail and leisure sectors.

- UK households are facing a decline in real disposable income, as such this will negatively affect spending behaviour due to the recent increase in costs of living, energy costs, inflation, and recent rises in interest rates which affect people's ability to spend and their rising tax burden.
- The increase in costs of retail goods is now being passed onto consumers, indicating the cost pressure in retail, manufacturing and distribution are just as (if not more) significant than they are on household budgets. On this basis spending on discretionary items and bigger ticket items is likely to see the largest fall which will be coupled with the decline in the spending on household items such as carpets, furniture and white goods.
- The last few years have been a very difficult period for the retail industry. The pandemic has accelerated changes in consumer behaviour that were already reshaping the sector and put a renewed spotlight on the future of town centres.
- As comparative normality returns following the lockdowns of 2020, 2021 and early 2022, the predicted continued decline in town centre retail has not necessarily materialised. Nonetheless, it is clear that the UK's towns and cities have more retail space than they need; and innovative ideas are needed to rethink and reinvent the UK's town centres so that they are fit for purpose in the post-pandemic world.
- Vacancy rate trends illustrate the challenges that the retail sector has faced during the pandemic. According to the Local Data Company (LDC), the overall retail and leisure vacancy rate jumped from 12.1% in Q4 2019 to a peak of 14.5% in Q2 and Q3 2021. At the end of Q4 2022, LDC reported an improvement at 13.8%.
- The geography of retail activity changed during the pandemic, with **increased homeworking causing consumer demand to shift** away from city centres to local neighbourhood locations. Consequently, vacancy rates held up much more strongly in commuter and market towns than in major cities. This trend was still evident in early 2022, with London being the only UK region to see its vacancy rate rise in Q1.
- **Footfall** figures show that city and town centre retail activity has improved greatly since the easing of lockdown restrictions in early 2022, as more people have returned to the office. Springboard data indicates an **uplift of 42% in footfall** nationally at the end of 2022 when compared to 2021. (Source: (The Year That Was 2022, published by Springboard in January 2023)
- It is widely acknowledged that even pre-Covid, retail was undergoing structural change. This resulted in numerous high profile corporate failures. Whilst a number of these retail groups were rescued or restructured by way of CVAs, their legacy store **portfolios have been rationalised**, resulting in a significant number of shops being closed or trading on a "flexi

lease” basis, often paying minimal rental or turnover based rent. The challenge for landlords going forward is to convert these leases into more balanced agreements.

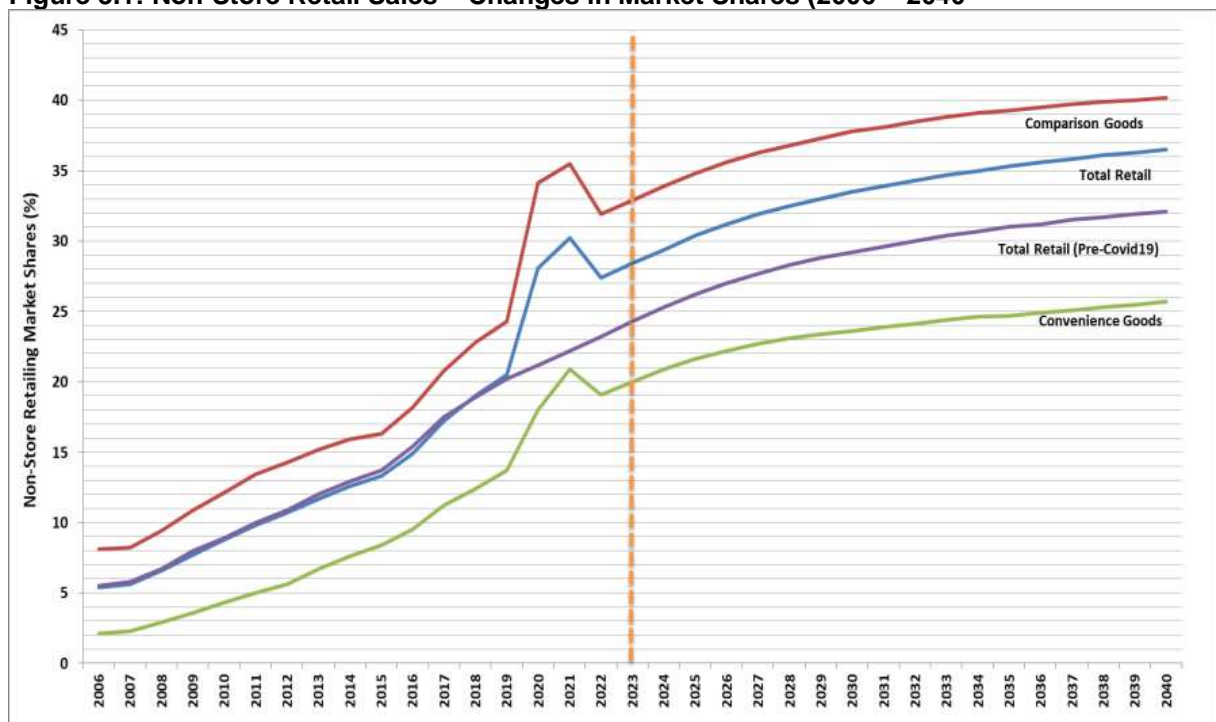
- **Online sales** have been impacting the retail sector for more than a decade – according to Experian in 2012 online sales were 10.7% of all UK sales (Source: Retail Planner Briefing Note 19, published in January 2022). Ten years later in 2022 online retail sales were estimated to be 27.4%. Not surprisingly online sales increased significantly during the various lockdowns. Office for National Statistics (ONS) data indicates that at the height of the pandemic between November 2020 and January 2021 online sales exceeded 37% of all UK retail sales.
- The **COVID-19 pandemic** impacted a wide range of retail, catering and leisure formats and, while restrictions have now been removed, consumer behaviour has changed. This trend is occurring nationwide and will also affect Coventry City Centre and the district centres. Many businesses will be carrying debt from depressed sales during the pandemic and are now faces with rising operational costs and labour shortages (discussed below). On top of this, the current **cost of living crisis** will test the sector further as consumers rein in spending as rising inflation curtails disposable incomes.
- One of the obvious impacts of the difficulties experienced within the retail sector is the **fall in retail rental values**. The larger retail groups have enjoyed a particularly strong negotiating position and lease events represent an opportunity to reduce costs and increase flexibility. Typically, retailers seek some or all the following:
 - Turnover and less commonly profit rents as opposed to contracted rents linked to market rental value.
 - Rental caps at review.
 - Shorter leases and regular tenant break options.
 - Capped service charge.
 - Pandemic clauses with rent cessation provisions in case of forced closure.
 - Larger incentive packages, including capital contributions, enhanced handover specifications and extended rent free periods
- Notwithstanding current challenges, there are some **positive signs within the retail and leisure sectors**.
 - We have seen increased **demand for neighbourhood and convenience retail** particularly from independent service orientated retailers.
 - **Use Class E has allowed flexibility** and for certain occupiers, previously outside of the former ‘A’ Use Classes, access to primary retail. In particular former, Class ‘D1’ and ‘D2’ uses including the commercial health, beauty and wellbeing sub sectors. This has helped to alleviate vacancy rates in town centres.
 - The **NHS is increasingly taking redundant retail** space in shopping centres and high streets locations. Examples include proposals for the Pentagon Centre, Chatham (Kent); Victoria Centre, Southend (Essex) and the Swan Centre, Eastleigh (Hampshire).
 - There is **greater leasing activity** within the independent restaurant sector, particularly for fitted restaurant space, thereby mitigating capital expenditure. External seating areas are now particularly sought after by operators.
 - The **leisure sector is also evolving**, and new competitive socialising concepts are seeking sites particularly in larger urban areas.
 - The situation with both the **retail and hospitality sectors remains fragile**. The cost of living crisis; staff shortages; interest rate rises and rising energy costs suggest it is likely to take a good deal of time for the market to stabilise and for the “new post-pandemic normal” to be properly understood.

IMPACT OF COVID-19 AND THE COST OF LIVING CRISIS

3.3 Our review also takes account of the **key trends** that have been impacting on the commercial property market and the UK's towns and high streets over the last decade or more - since the 2008 recession - and particularly over the period of the COVID-19 pandemic and the current cost of living crisis. Some of the national headline trends are:

- The impact of the COVID-19 pandemic in 2020 saw the UK economy experience its biggest annual decline in Gross Domestic Product (GDP) (-9.9%) for over 300 years.
- The government's decision to close non-essential retail and leisure outlets in spring and autumn of 2020, followed by a third national lockdown from January 2021, had a significant impact on a wide range of formats: from leisure and hospitality sector, to fashion retailers and department stores.
- In addition to these enforced temporary closures, continued social distancing requirements alongside a weak consumer economy have placed downward pressure on sales for many non-food retailers. Many retailers have fallen into administration, whilst those already seeking to consolidate store portfolios prior to the pandemic have been bringing permanent store closures forward, impacting overall levels of retail employment.
- A weak consumer **economy** born out of the response to the COVID-19 pandemic has caused widespread disruption to the UK's economy.
- **The pandemic has accelerated the market share of online retailing** – particularly for comparison (non-food) goods. Experian's figures forecast that the total non-store market share to marginally decrease to 27.4% in 2023; and the share of comparison and convenience goods retailing to 31.9% and 19.1% respectively.

Figure 3.1: Non-Store Retail Sales – Changes in Market Shares (2006 – 2040)

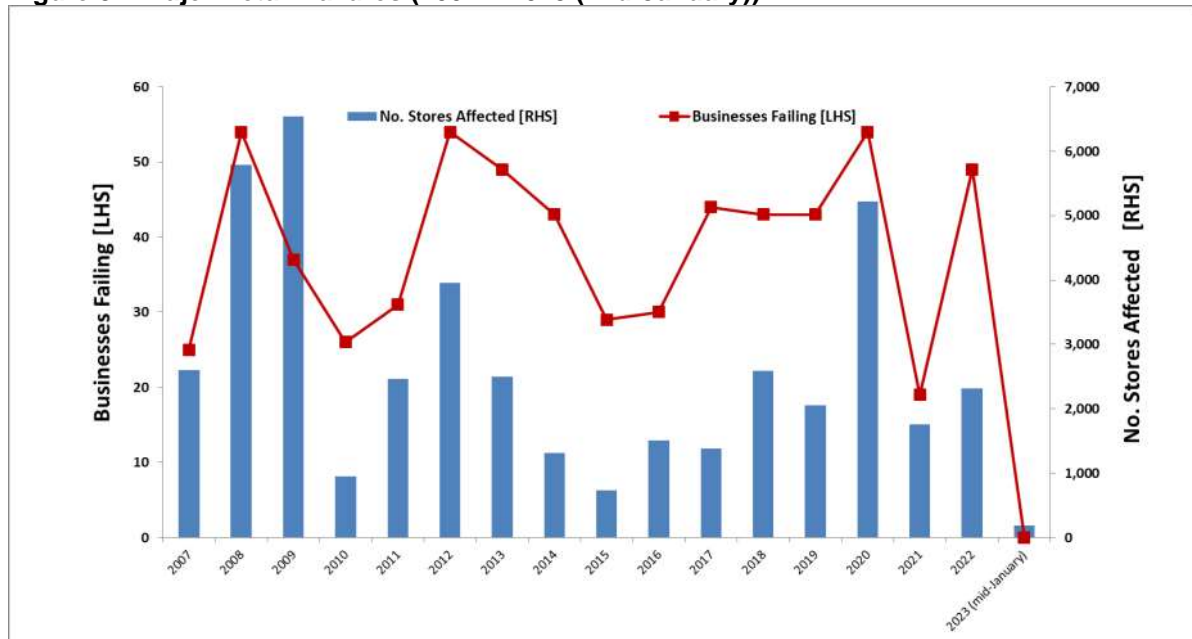


Source: Source: Experian Retail Planner Briefing Note 19 (January 2022) and Experian Retail Planner Briefing Note 17 (February 2020)

- Although Covid pressures on the economy may be easing, the challenges facing consumers, businesses and town centres continue to intensify. The end of the Government's furlough scheme, and the removal of the majority of relief packages, aligned with recruitment and supply issues, left many businesses exposed. The latest industry research shows:

- **Over 2,000 closed stores in 2022 due to administration**, with almost 35,000 jobs lost. This compared with 5,200 store closures in 2020, and over 109,000 job losses. (Source: Centre for Retail Research, published January 2023)

Figure 3.2 Major Retail Failures (2007 – 2023 (mid-January))



Source: Centres for Retail Research (January 2023)

- Average vacancy rates for all retail space stood at a record high of 15.7% in 2021.
- Shopping centres had the highest average vacancy rates (19.1%).
- Average vacancy rates were lower for high streets (14.4%), and retail parks (11.3%). (Source: data published by Local Data Company in March 2022)
- GDP in the UK expanded by 7.5% in 2021, making it the fastest growing economy in the G7 group of economies. However, the UK was recovering from a lower base, having seen the largest decline in 2020, at 9.4%. However, the scale of the rebound is uncertain given inflationary pressures; households are faced with rapidly rising inflation, an increase in the rate of national insurance contributions, energy price cap increases, higher interest rates and the war in Ukraine.
- According to the Office of Budget Responsibility, Consumer Price Inflation was set to peak at a 40-year high of 11% for Q4 2022; well above the Bank of England target rate of 2% (Economic and Fiscal Outlook (November 2022)). Hence there are macroeconomic shifts unfolding. Inflation has hit a 30-year high and the backdrop for household finances looks increasingly daunting. A '**cost of living crisis**' has emerged, which will hit the least affluent households the hardest, sparking recessionary behaviours, weaker spending and softer confidence. Rising prices are anticipated **to erode real wages and reduce living standards by 7% cent** in total over the two financial years to 2023-24. On this basis these are signs of a potential technical recession (two consequent quarters of declining GDP) being anticipated over 2023-2024.
- The implications are that this will result in a drop in real disposable incomes in 2023 and beyond over the short term to 2024. Against this backdrop the latest forecast **growth in GDP is projected to moderate to an average of 4.2% in 2022** with a projected average of **-0.9% by 2023** according to HM Treasury estimates. (HM Treasury Forecasts for the UK economy: a comparison of independent forecasts No. 424, published in November 2022).

RETAIL SPENDING

- 3.4 The pandemic has inevitably had a dramatic impact on consumer spending and retail sales in 2020 and 2021. Although consumer spending has been a key driver of economic growth since the BREXIT referendum in June 2016, there had been increasing signs pre pandemic that growth was starting to “soften”. The latest figures show that household spending fell by over 20% quarter-on-quarter in the second quarter of 2020. This was the largest quarterly contraction on record and is attributed to the impact of the COVID-19 pandemic, particularly the effect of containment measures that limited spending potential and the impact on employment (i.e. job losses and furlough scheme). Spending on hospitality, travel and leisure was dramatically impacted during this period. Retail also suffered as businesses were forced to close; although this was partly cushioned by an increase in food and online purchases.
- 3.5 The latest retail and leisure spend per head forecasts from Experian Business Strategies Retail Planner Briefing Note 19 (February 2022) show for:
- **Convenience goods:** after a significant +8.2% growth in spend in 2020 from household spend on “essential” food and convenience goods during the pandemic, spend is forecast to drop by -3.7% in 2021 and by -2% in 2022 as convenience spend patterns return to “normal” conditions. Experian predict that annual (per capita) growth in convenience spend will “flatline” at around +0.1% from 2023 in to the foreseeable future (up to 2040). This rate is still an improvement on the historic long term trend (1997-2020) of -0.6% per annum.
 - **Comparison goods:** experienced less fluctuation in per capita growth than compared to convenience per capita growth. Growth rates dropped from 2.2% per annum in 2019 to 1.6% in 2020, with Experian forecasting a steady improvement on growth rates in 2021 (1.9%) and 2022 (2.1%) before settling at 2.8% up to 2028 and 2.9% in future years. Although, this growth forecast is significantly below the historic long-term trend (1997-2020) of +5.1% per annum.
 - **Leisure spend:** Following a dramatic -37.2% fall in leisure spend per head in 2020, Experian forecast a “bounce” back to growth in 2021 (+21.9%) and 2022 (+24.1%). Average yearly growth is then forecast to settle at approximately +1.1% over the period 2024-28 and +0.9% over the long term (between 2029 and 2040). This growth in leisure spend is consistent with the historic long-term trend (1997-2020) of 1.1% per annum.
- 3.6 Clearly any further dampening of growth rates over the short to medium term due to the current cost of living crisis which will impact on the economic capacity forecasts identified by the study, as well as on the business models of investors and operators (including the demand for new space).
- 3.7 Experian Business Strategies is due to release new data on expenditure growth forecasts in the coming months, which will be accounted for within the Stage 2: Retail and Leisure Needs Assessment.

OTHER FACTORS INFLUENCING GROWTH AND DEMAND IN THE RETAIL AND LEISURE SECTORS

- 3.8 **Changing Floorspace Requirements** - the challenging economic conditions and growth in online sales have had a significant and permanent impact on consumer shopping and spending behaviour. As a result retailers need to constantly review and rapidly adapt their business strategies, requirements and store formats to keep pace with the rapid changes in the sector.
- Convenience retailers focusing further growth on online sales, and continued growth of smaller convenience store formats (e.g. Tesco Express, Sainsbury’s Local and Little Waitrose). While the era of major superstore developments has passed for the likes of Tesco, Sainsbury’s, Asda and Morrisons, the discount food retailer market is leading development in new supermarket stores across the UK. With Lidl and Aldi gaining traction within the food retail market, buoyed by households switching to discount food offer as the cost of living crisis takes hold, it is expected that demand for new discount foodstores will continue for the next few years.

- The non-food retail sector has also experienced a significant impact from the rise of online shopping over the last decade, which has impacted on business models and store viability. Many well-known retailers have either closed or have significantly reduced their store portfolios, with the trend for store closures and associated job losses. The pandemic has accelerated the demise of a number of high profile retailers that were already struggling due to falling sales and increasing costs/debt (including Debenhams, Oasis, Warehouse, Laura Ashley, the Arcadia Group and Kath Kidston).
 - National retailers with extensive high street store portfolios are struggling to maintain market shares and remain profitable in the increasingly competitive environment. The higher costs of trading from high streets compared with online and out-of-centre retailing, also means that it is not a “*level playing field*” and many high street businesses are burdened with rising debts. This is a further contributing factor to the significant number of store closures that have occurred over recent years. Although some retailers are better positioned to cope with the growth in online shopping, and the shifts in consumer behaviour and preferences, many are struggling to position themselves quickly enough to absorb rising costs/debt, and engineer the vital transition to a more technology-focussed business model. These trends and challenges have been further exacerbated and accelerated by the pandemic.
- 3.9 **Rising Operating costs - ‘Bricks and mortar’** retailers are having to absorb higher than inflation increases in year-on-year occupancy costs (for example, rents, business rates, service charges, staff costs, etc.). Research shows that, on average, retailers’ operating costs (including rent, business rates, staff wages, utilities, etc) increased by +3.5% in 2018. This outpaced sales growth for many retailers, eroding profitability and resulting in more store closures. As described above it is not a “*level playing field*” between high street and online retailing, or between high street and out-of-centre retailing. In response to the budgetary challenges from rising costs and tight margins, retailers will need to drive up efficiencies and productivity from existing floorspace to remain viable.
- 3.10 **Competition from out of centre retailing** - vacancy levels in out-of-centre retail warehouses and parks have also increased over the last decade following the closure of major operators (such as, for example, Toys R Us, Poundworld, Office Outlet, etc.), and a reduction in the store portfolios of other major out-of-centre retailers (such as, for example, B&Q and Homebase). There are likely to be further increases in closures, particularly in the poorly performing “*first generation*” and secondary shopping locations, as leases come up for renewal and more retailers go into administration. As a result a number of out-of-centre foodstore and retail warehouse sites are being repurposed and/or redeveloped for alternative uses, including logistics and residential uses.
- 3.11 Notwithstanding this, most out-of-centre shopping locations retain their significant competitive advantages over town centres and high streets in terms of their supply of larger format modern outlets, their lower occupancy costs, extensive free parking and convenient access to the road network. This is still an attractive proposition for those retailers that are still seeking space in the current market. For example, as part of its revised business model Marks & Spencer has closed a number of its traditional high street stores and “*replaced*” these with ‘Simply Food/Food Hall’ branded stores in out-of-centre locations (for example in Dover, Maidstone, Great Yarmouth, Harlow, Wakefield and Rugby). As a result, retailers who previously anchored the vitality and viability of town centres, are now competing directly with high streets for shoppers, spend and sales.

GROWTH IN FOODSTORE DELIVERIES

- 3.12 Since 2015, online shopping market share for food and other grocery goods has almost tripled rising from 5.8% to 15.2% in 2022. The biggest jump in market share occurred during the pandemic going from 7.7% in 2019 to 12.5% in 2020 to 15% in 2021 (Source: www.statistica.com). Market share is expected to growth year on year albeit at a more incremental rate compared to more recent years.

- 3.13 This growth in market share for online grocery shopping will increase demand for grocery distribution centres and also existing foodstores where online delivery produce can be sourced from to serve last mile deliveries.
- 3.14 Tesco is the leading online shopping grocer based on online food and beverage turnover sales, followed by Sainsbury's, then Ocado (online retailer) and Asda. Most of the top UK grocery retailers now offer online grocery sales, be it as online retailers in their own right or in partnership with online operators. For example, M&S is partnered with Ocado. The only major foodstores that do not offer online grocery delivery service is Aldi and Lidl. Their apparent resistance to entering the grocery delivery market is likely to relate to the significant upfront capital cost/ investment required and operational costs, which will no doubt conflict with Lidl and Aldi's low cost model.
- 3.15 Operational costs are an issue for grocery delivery services and as demand for faster delivery services increase, there will be added pressure on keeping up with rising customer expectations. As such, there is a question on how far operating costs for delivery services can be stretched pressure grows on retailers to lower prices.
- 3.16 Where demand for grocery deliveries are influencing high streets is within the last mile delivery sector that are populated by online service providers such as Gorillas, Getir, Weezy, and also Uber Eats and Deliveroo who have partnered with retailers. Deliveroo for example, provide last mile delivery services where products are sourced from foodstores and convenience stores within the immediate area. Tesco now have their own dedicated rapid service delivery service, Whoosh, and similar to other rapid delivery services, sources produce from its local stores.
- 3.17 This type of retail may be supporting the viability of local businesses but the unintended consequence may be that is reducing opportunities for other businesses to benefit from linked trade generated from in person top up shopping.

4. SOCIO ECONOMIC & CONSUMER PROFILE

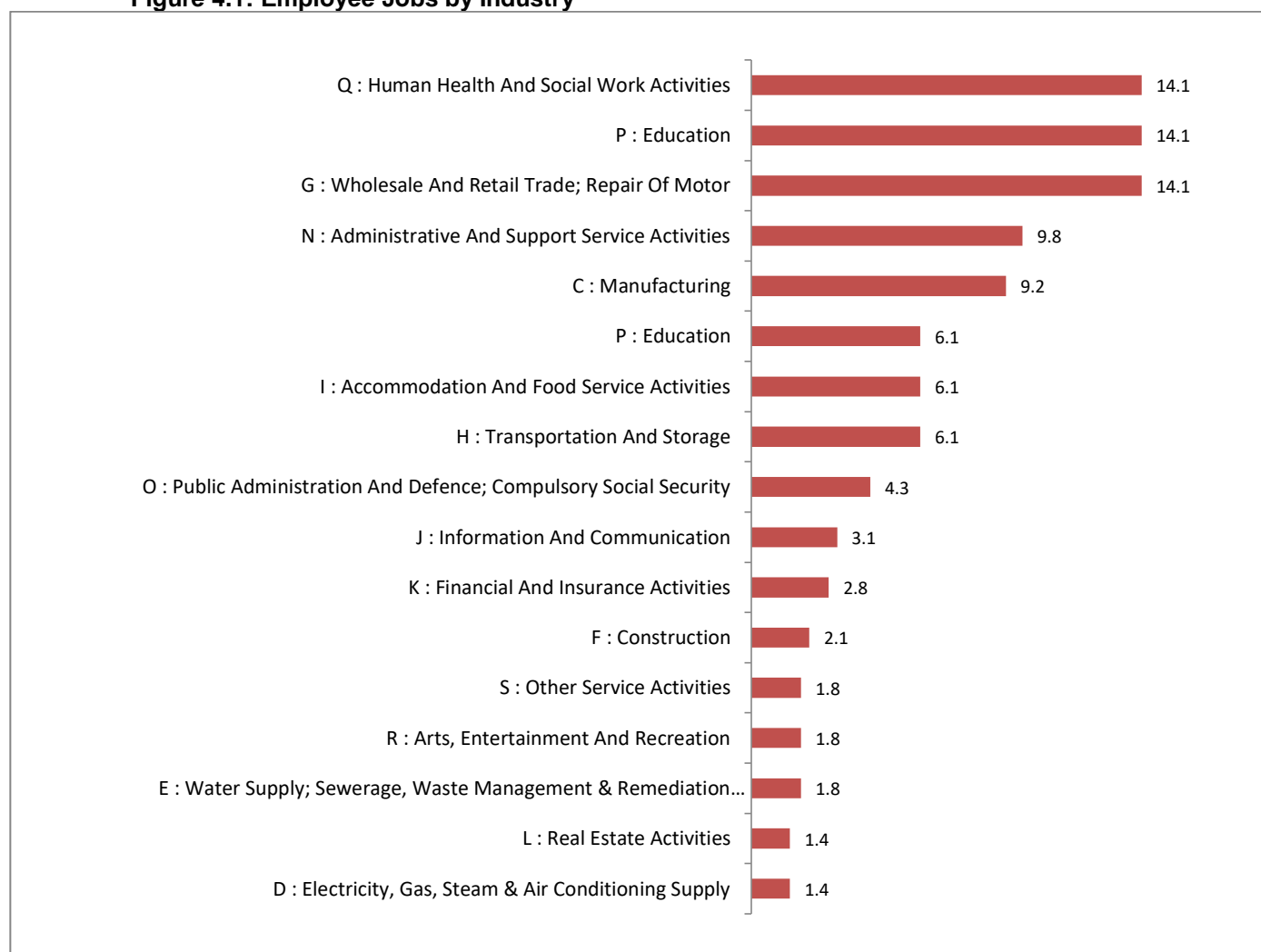
4.1 This section provides an overview of Coventry City's socio-economic profile based on the most available data on key demographic and economic variables.

SOCIO ECONOMIC PROFILE

4.2 The following sets out key socio-economic headlines for the Coventry City area:

- Coventry City Council's population was estimated at 345,300 in 2021 based on 2021 Census data, an increase of +28,400 from 316,900 in 2011.
- The last estimations on population profile show that almost two thirds (65.4%) of Coventry's population are within the working age (16 to 64), which is higher than the average for the West Midlands and Great Britain (GB).
- An estimated 74.8% of those within the working age are economically active; lower than averages for the West Midlands and GB.
- Those that are in employment are more likely to hold jobs that fall within lower skilled categories (Soc 2020 Major Group 8-9), such as Process Plant & Machine Operatives and Elementary Occupations.
- Gross weekly earnings for Coventry's resident workforce stands at £630.60, which is higher than the West Midlands average (£613.30) and lower than the GB average (£642.20).

Figure 4.1: Employee Jobs by Industry



Source: NOMIS

- As of December 2022, 4.7% of Coventry's resident working age population claimed unemployment-related benefits, which is just below the West Midlands average (4.8%), but above the GB average (3.7%).
- The level of car ownership in Coventry is significantly below average overall, with a particularly low level of multiple car ownership

CONSUMER PROFILE

4.3 The following sets out key consumer profile headlines for the Coventry City, which are based on data from PMA and Experian:

- The total population within the Coventry Primary Retail Market Area defined by Promis PMA (see figure below) is estimated at 396,000 at end 2021, above PMA's average for similar pitched centres and ranking the city 23 out of the PROMIS Centres.

Figure 4.2: PMA Primary Retail Market Area for Coventry

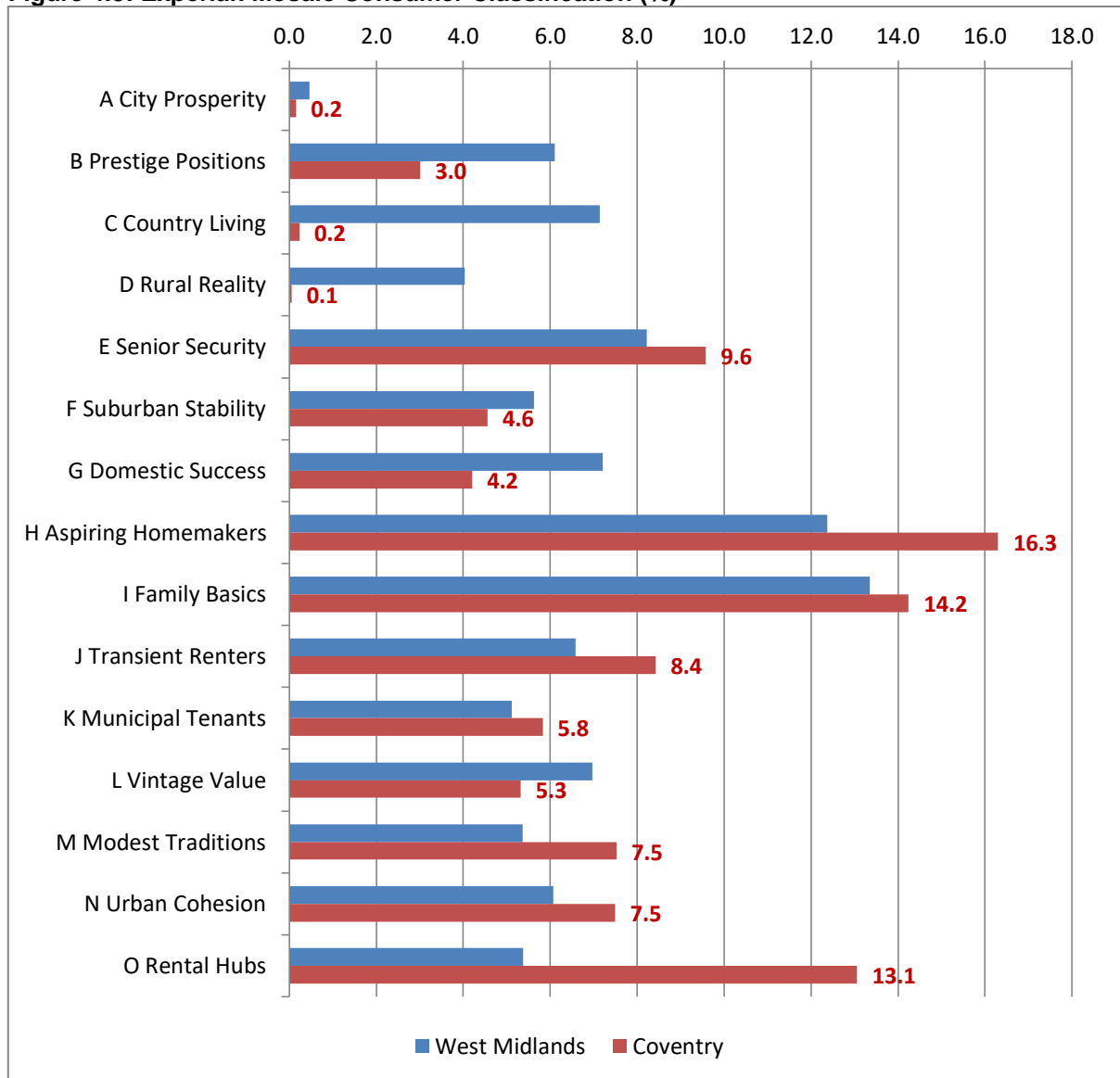


Source: PMA Promis

- The Coventry Primary Retail Market Area is not particularly affluent, ranking 168 of the PROMIS centres on the PMA Affluence Indicator at 2011. Over the period 2001 to 2011 Coventry saw a decline in the Affluence Indicator Rank; most recently this has seen little change.
- Coventry ranks 31 in terms of the volume of total retail spend available within the Primary Retail Market Area and is forecast to see below average percentage growth in the available pool of retail spending over the forecast period, end 2021-2026.
- Diversion of total retail spending to online in 2021 was estimated to be 29.2%, which is comparable with the average. This reflects the accelerated shift to online during the COVID-19 pandemic.
- Looking at the Coventry City District area, data from Experian identifies an average spend on retail goods for residents is £5,603 per person in 2020, which is lower than the average spend per person for the West Midlands (£6,005) and nationally (£6,518).

4.4 A review of Experian’s Mosaic Consumer Classification provides another indicator of affluence and consumer strength. The figure below identifies the proportion of households by headline and how it compares to the West Midlands region.

Figure 4.3: Experian Mosaic Consumer Classification (%)



Source: Experian

Note: figures quoted as percentage values

4.5 For Coventry City District, households are generally more likely to fall within lower to mid-income consumer bands where consumer spending potential will be more constrained. The highest proportion of households are classified as Aspiring Homemakers (16% of households), followed by Family Basics (14%) and Rental Hubs (13%).

4.6 The table overleaf provides a snapshot of key consumer characteristics of these three particular consumer classification groups.

Table 4.1: Characteristics of Dominant Experian Mosaic Consumer Classifications for Coventry City Households

H: Aspiring Homemakers	Account for 16.3% of Coventry's Households	Younger households Full time employment Private suburbs Affordable housing costs Starter salaries Buy and sell on eBay Typical income: <£40k-£49k
I: Family Basics	Account for 14.2% of Coventry's Households	Families with children Aged 25 to 40 Limited resources Some own low cost homes Some rent from social landlords Squeezed budgets Typical income: <£15k
O: Rental Hubs	Account for 13.1% of Coventry's Households	Aged 18-35 Private renting Singles and sharers Urban locations Young neighbourhoods High use of smartphone Typical income: £20k-£29

Source: Experian

5. RETAIL CONTEXT & CENTRE AUDITS

- 5.1 This section sets out the findings of a review of Coventry's main centres to provide a general overview on their role and function in the retail hierarchy and their competitive position based on their retail and leisure offer.
- 5.2 The review is based primarily on a desktop assessment of available evidence on diversity of town centre commercial uses using survey data published by Experian Goad. Where published data is not available a physical audit (street survey) has been undertaken in January 2023 and all outlets recorded.
- 5.3 It should be noted that the Coventry and Shopping Centres Study 2014 (2014 SCS) utilised the Council's 2013 Land Use Surveys, whereas this review is informed by Experian Goad data. Therefore, there are some differences in how the evidence is assessed. For example, the previous 2014 study assessed diversity of town centre uses based on Use Classes, which include: Convenience shopping, comparison shopping, non-retail services (former Use Class A1), leisure services (former Use Class A2), food and beverage categories former (Use Class A3-A5), and vacancies. In contrast, the current review assessed diversity of uses against town centre sector categories defined by Experian Goad, which include: Convenience, Comparison, Retail Services, Leisure Services, Financial and Business Services and Vacant.
- 5.4 The main difference is that Experian's identify different service categories that cannot be easily matched with the Use Classes used to inform the 2013 Land Use Surveys. Therefore, we have grouped all the service-based categories under one category for comparison purposes. Additionally, some town centre boundaries are different between the two datasets and as a result are not directly comparable.
- 5.5 The following table sets out town centre Use Classes broadly relate to Experian Goad town centre sector categories:

Category	Example	Use Class
Convenience Retail	Foodstore, convenience store, health food, CTN, vape, off licence, etc.	E(a) Shop other than for the sale of hot food
Comparison Retail	Clothing, footwear, furniture, chemist, optician, etc.	E(a) Shop other than for the sale of hot food
Retail Service	Photo processing, travel agents, opticians, etc.	E(a) Shop other than for the sale of hot food
Retail Service	Photo studio, vehicle rental, dry cleaners/laundrette, hair salon, nail bar, barbers, etc.	E(c) ii. professional services (other than medical services)
Leisure Service	Cafes, coffee shop, restaurants, etc.	E(b) Food and drink which is mostly consumed on the premises
Leisure Service	Hot food takeaways	Sui Generis
Leisure Service	Bars, pubs, nightclubs	Sui Generis
Leisure Service	Cinemas, leisure centres, fitness venues, ten-pin bowling, etc.	E(d) Indoor sport and recreation (not swimming pools, ice rinks or motorised vehicles or firearms)
Leisure Service	Casinos, bingo halls, betting offices, amusement arcades, etc.	Sui Generis
Leisure Service	Hotels, guesthouses, etc.	Class C1 Hotels
Financial & Business Services	Banks, building societies, mortgage lenders, etc.	E(c) i. financial services
	Estate agents, printing and copying, legal services, etc.	E(c) ii. professional services (other than medical services)

- 5.6 It should be noted that office, civic and medical services are not included as town centre categories in Experian Goad assessments.
- 5.7 This partial refresh of the 2014 Health Check provides an overview of the following centres as defined in the Coventry Local Plan (2017).

Table 5.1: List of Main Centres

City	Coventry City Centre
Major District Centres	Arena Park Brandon Road Cannon Park Eastern Green (Not developed)
District Centres	Ball Hill Bell Green Brade Drive Davertry Road Earlsdon Foleshill Jardine Crescent Jubilee Crescent

- 5.8 Appendix 1 shows the distribution of centres across Coventry City administrative area.
- 5.9 A more detailed review of Coventry’s centres (in the form of a comprehensive health check assessment) will be undertaken in the Stage 2: Retail & Town Centre Uses Assessment.
- 5.10 The following provides an overview of the retail context for each centre, placing particular focus on Coventry City in cognisance of the centre’s position within the City’s centre hierarchy and role as a sub-regional centre:

COVENTRY CITY CENTRE

- 5.11 Coventry City Centre serves as the District’s main shopping, leisure and administrative centre and is situated around 20 miles east of Birmingham, its principal competitor for shopping and leisure.

Diversity of Uses

- 5.12 The Category Goad Report published for Coventry is based on a survey undertaken in April 2022. The table below shows that Coventry has a total 614 outlets with an overall quantum of 193,441 sqm in floorspace. There are 172 Retail (Comparison and Convenience Retail combined) outlets which is made up of 121 Comparison Retail outlets and 51 Convenience Retail Outlets. The total retail floorspace is 58,705 sqm. The number of retail outlets and floorspace is lower compared to the UK average, particularly in relation to floorspace, Comparison Retail being almost 10 percentage points lower than the UK average (21.5% compared to 30.1% respectively) and Convenience Retail almost half of the national average (8.8% compared to 15.6% respectively).
- 5.13 The city centre has a strong Leisure Service representation, with the sector having the most outlets (185) and the largest amount of floorspace (64,363 sqm) both of which are higher than the national average. Retail Service has the lowest representation overall, with 60 outlets and only 4,710 sqm of floorspace, lower than the UK average. Financial and Businesses Services is similar to the UK average, with the outlets accounting for 11.4% of the total (compared to the UK average of 8.6%) and floorspace accounting for 6.8% (the UK average being 6.6%).
- 5.14 Vacant outlets represent the second highest amount of outlets with a total of 127 and 52,462 sqm of floorspace. Compared to the UK averages, vacant outlets and floorspace is much higher in

Coventry City Centre, particularly in relation to floorspace where the amount in the city centre is double the national average (27.1% compared 13.8%).

Table 5.2: Outlets and Floorspace in Coventry City Centre

	No. Outlets	% of Total Outlets Coventry	% of Total Outlets UK Average	Gross Floorspace (sqm)	% of Total Floorspace Coventry	% of Total Floorspace UK Average
Comparison Retail	121	19.7%	26.9%	41,685	21.5%	30.1%
Convenience Retail	51	8.3%	9.3%	17,020	8.8%	15.5%
Retail Services	60	9.8%	15.8%	4,710	2.4%	7.2%
Leisure Services	185	30.1%	25.3%	64,363	33.3%	26.2%
Financial & Business Service	70	11.4%	8.8%	13,201	6.8%	6.6%
Vacant	127	20.7%	13.9%	52,462	27.1%	13.8%
Total	614	99.8%	99.8%	193,441	100.0%	99.4%

Source: Experian Category Goad Report - April 2022

- 5.15 The table below shows the food and beverage offer within the Leisure Service sector with a total of 144 outlets and 29,274 sqm of floorspace. Fast Food & takeaways have the most outlets with 43 closely followed by cafes with 41. Public Houses and Bars both have the lowest number of outlets with 18, although they also have the largest quantum of floorspace (6,364 sqm and 6,308 respectively). Overall, the city centre appears to have a strong Food and Beverage offer which is similar to the UK average.

Table 5.3: Food & Beverage Outlets and Floorspace

	No. F&B Outlets	% of Total Outlets Coventry	% of Total Outlets UK Average	F&B Floorspace (sqm)	% of Total Floorspace Coventry	% of Total Floorspace UK Average
Bars & Wine Bars	18	2.93%	2.24%	6,308	3.26%	2.36%
Cafes	41	6.67%	5.00%	5,779	2.99%	2.83%
Fast Food & Takeaways	43	6.99%	6.05%	4,915	2.54%	3.03%
Public Houses	18	2.93%	2.60%	6,364	3.29%	3.45%
Restaurants	24	3.90%	4.89%	5,909	3.05%	4.16%
Total	144	23.42%	20.78%	29,274	15.13%	15.83%

Source: Experian Category Goad Report - April 2022

- 5.16 The table below shows the changes in outlet number and floorspace since 2013 (all service-based sectors combined). Between 2013 and 2022 there was a reduction in 69 Comparison Retail outlets, from 190 to 121, a reduction of -36.3%. Convenience Retail has not changed by any significant margin, only a reduction in 2 outlets. Services overall appear to have gained 75 outlets over this time period which is an increase in over 31%, while vacancies have also increased substantially, by 43 outlets which results in an increase of over 50% vacant outlets.

Table 5.4: Change in Outlets 2013-22

	No. Outlets 2013	No. Outlets 2022	% Total Outlets 2013	% Total Outlets 2022	Change in Outlets 2013-22	% Change in Outlets 2013-22
Comparison Retail	190	121	33.5%	19.7%	-69	-36.3%
Convenience Retail	53	51	9.3%	8.3%	-2	-3.8%
Services	240	315	42.4%	51.2%	75	31.3%
Vacant	84	127	14.8%	20.7%	43	51.2%
Total	567	614	100.0%	99.8%	47	8.3%

Source: Experian Category Goad Report - April 2022 and Coventry and Shopping Centres Study 2014

Retail Profile

5.17 The table below shows the number of outlets represented by national multiples, which occupy a total of 159 outlets and accounts for 33% of all occupied outlets. The highest representation of multiples is from Comparison Retail, with 65 outlets which account for over half of all comparison outlets (54%). The second highest representation of multiples is from the Finance and Business sector, with a multiple representation of 39%. Just under a quarter of convenience retail outlets are represented by multiples (24%), which is the same percentage as Leisure Service. The lowest representation of multiples is from the Retail Service sector which has 11 outlets occupied by multiples which accounts for 18%.

Table 5.5: % Multiple Representation of total outlets

	2022	% of Total
Comparison Retail	65	54%
Convenience Retail	12	24%
Retail Service	11	18%
Leisure services	44	24%
Financial & Business Service	27	39%
Total multiples	159	33%

Source: Experian Category Goad Report – April 2022

5.18 The table below identifies key national retail, leisure and service operators trading in Coventry centre

Table 5.6: National Multiple Representation

Convenience	Comparison		Leisure Service		Retail & Financial Service
Greggs	Argos	Pandora	Bella Italia	Pure Gym	Max Spielmann
Sainsbury's	Boots	Peacocks	Betfred	Starbucks	Specsavers
Spar	Bon Marche	Pep&Co	Caffe Nero	Subway	Vision Express
Tesco Express	British Heart Foundation	Poundland	Coral	Wagamama	Lloyds
Timpson	Card Factory	Primark	Costa	Zizzi	Barclays
Nisa	Clairs's	River Island	Five Guys		Nationwide
Iceland	Deichmann	Savers	KFC		Natwest
	EE	The Body Shop	Ladbrokes		
	Footlocker	W H Smith	McDonalds		
	H&M	Waterstones	Nando's		
	Home Bargains	Wilko	Odeon		
	Lush	HMV	Paddy Power		
	Marks & Spencer	Sports Direct	Pizza Express		
	New Look	Superdrug	Premier Inn		

5.19 The key anchor stores in Coventry are Marks & Spencer within The Precinct and Primark on Broadgate. Until recently, Debenhams anchored the West Orchards shopping centre in the city, and TJ Hughes anchored the Lower Precinct - however both stores closed during 2021.

- 5.20 Fashion provision in the city is largely focused on lower middle/mid-market retailers, with only very limited representation of operators from the upper middle/quality end of the spectrum.
- 5.21 Based on the profile of national multiples, the city centre can be described as offering a basic range of mass-market multiples and high street fashion retailers, set within a compact, almost fully pedestrianised, area that provides a shopper-friendly, though generally dated and rundown, retail environment.
- 5.22 According to Promis, top achievable prime rents in Coventry were around £65 psf Zone A at mid 2022; this implies a cumulative decline in prime rents since end 2017 of -53.6%, compared with the PMA PROMIS average rate. As a comparison, prime rents in Coventry peaked at £170 psf ZA at end 2008, which highlights how far rents have fallen and follows a trend for sub regional cities post financial crisis.

Recent Investment in Coventry

- 5.23 Key investment highlights for Coventry include:
- Awarded the title UK City of Culture 2021, a year long arts and cultural programme that was estimated to have generated £172 million of investment in improvements to cultural venues and public realm, and the events and activities that ran throughout the programme.
 - Major £450m mixed use regeneration scheme coming forward for City Centre South.
 - A second major regeneration proposal the development of Friargate, adjacent to Coventry railway station, which will create a new business district. Along with offices the scheme will include two hotels, retail and leisure floorspace
 - Plans were approved by Coventry City Council and Warwick District Council in early 2022 for a large electric car battery factory, at the site of Coventry Airport.
 - The repositioning of Cathedral Lanes as a leisure destination in 2015 enhanced food & beverage (F&B) provision in the city, attracting brands such as Wagamama and Cosy Club. The Cafe/Restaurant Score in Coventry even increased during 2021, following the arrival of Five Guys and Turtle Bay to Cathedral Lanes.
 - IKEA closed during 2020 and while this loss for the centre's retail offer there are reports that the outlet may be redeveloped into an arts venue.
 - There are plans to repurpose the second floor of the vacant Debenhams store in the West Orchards Shopping Centre into a multi-purpose leisure facility that will include a bowling alley, adventure golf course and restaurant/bar.
 - In early 2022, Flannels opened a large new store in part of the former BHS department store on Market Way.

Competitive Position

- 5.24 According to PMA Promis, which ranks centres across the UK based on the profile and scale of retail offer, Coventry City is classified PMA Promis as a Sub Regional Town that falls within a category of towns than be described as underperforming compared to other towns of its size. This reflects the strength of the centre's consumer catchment, which is limited due to the proximity of competition, namely Birmingham and stronger performing sub regional centres such as Royal Leamington Spa and other centres in the sub region. This is evidenced from the current retail study which shows leakage of retail expenditure from Coventry's catchment to these centres.

ARENA PARK (MAJOR DISTRICT CENTRE)

- 5.25 Arena Park, along with Cannon Road and Ball Hill (discussed later) is designated as a Major District Centre in the adopted Local Plan.
- 5.26 The data for Arena Park is based Experian Goad from a survey undertaken in April 2022 and has a total of 38 outlets with an overall floorspace of 25,070 sqm. Unlike traditional district centre formats, Arena Park is a purpose built shopping park. As such, the centre largely comprises Comparison Retail (16 outlets) representing 42.11% of the overall outlet offer and in terms of floorspace, the overall Retail offer accounts for over 85% representation (48.46% and 37.34% respectively). These figures are above the UK average, particularly in relation to floorspace (the UK average being 30.13% and 15.47% respectively). This means that although just under half of the outlets are represented by the remaining sectors, they only account for less than 15% of the remaining floorspace. There are currently 5 vacant outlets, which is on par with the UK average, although vacant floorspace only covers 1,200 sqm which is 4.79% and lower than the UK average.

Table 5.7: Number of Outlets and Floorspace in Arena Park

	No. Outlets	% of Total Outlets Arena Park	% of Total Outlets UK Average	Gross Floorspace (sqm)	% of Total Floorspace Arena Park	% of Total Floorspace UK Average
Comparison Retail	16	42.11%	26.87%	12,150	48.46%	30.13%
Convenience Retail	4	10.53%	9.27%	9,360	37.34%	15.47%
Retail Services	7	18.42%	15.75%	790	3.15%	7.23%
Leisure Services	5	13.16%	25.31%	1,380	5.50%	26.19%
Financial & Business Service	1	2.63%	8.75%	190	0.76%	6.60%
Vacant	5	13.16%	13.85%	1,200	4.79%	13.79%
Total	38	100.00%	99.80%	25,070	100.00%	99.41%

Source: Experian Category Goad Report - April 2022

- 5.27 All of the 5 Leisure Service outlets are within the food and beverage classifications and comprise 2 fast food takeaways, 2 restaurants and 1 café.

Table 5.8: Food & Beverage Outlets and Floorspace

	No. F&B Outlets	% of Total Outlets Arena Park	% of Total Outlets UK Average	F&B Floorspace (sqm)	% of Total Floorspace Arena Park	% of Total Floorspace UK Average
Bars & Wine Bars	0	0.00%	2.24%	0	0.00%	2.36%
Cafes	1	2.63%	5.00%	280	1.12%	2.83%
Fast Food & Takeaways	2	5.26%	6.05%	400	1.60%	3.03%
Public Houses	0	0.00%	2.60%	0	0.00%	3.45%
Restaurants	2	5.26%	4.89%	700	2.79%	4.16%
Total	5	13.16%	20.78%	1,380	5.50%	15.83%

Source: Experian Category Goad Report – April 2022

- 5.28 There has been an increase in 5 outlets since 2013, from 27 up to 32 which is an increase of 18.5%, however, there has also been an increase in 5 vacancies and therefore isn't necessarily a positive increase in floorspace. Convenience Retail outlet numbers have doubled from 2 to 4, and Services lost 4 outlets which is a reduction of 36.4%.

Table 5.9: Change in Outlets 2013-22

	Outlets 2013	Outlets 2022	% Total 2013	% Total 2022	Change in Outlets 2013-22	% Change in Outlets 2013-22
Comparison Retail	14	16	51.9%	42.1%	2	14.3%
Convenience Retail	2	4	7.4%	10.5%	2	100.0%
Services	11	7	40.7%	34.2%	-4	-36.4%
Vacant	0	5	0.0%	13.2%	5	-
Total	27	32	100.0%	100.0%	5	18.5%

Source: Experian Category Goad Report - April 2022 and Coventry and Shopping Centres Study 2014

5.29 Below is a table containing the main multiple retailer representation by sector. The centre is anchored by the Tesco Extra which has over 9,000 sqm in floorspace.

Table 5.10: National Multiple Representation

Convenience	Comparison		Leisure Service	Retail Service
Greggs	Boots	Marks & Spencer	Burger King	Max Spielmann
Holland & Barrett	Card Factory	New Look	Costa	Tesco filling station
Tesco Extra	Currys	Next	Nando's	Vision Express
Timson	Decathlon	O2	Subway	
	Game	Shoezone	Pizza Hut	
	Just for Pets			

BRANDON ROAD (MAJOR DISTRICT CENTRE)

5.30 Brandon Road District Centre comprises Warwickshire Shopping Park and includes large format outlets and a Morrisons Superstore. The data for Brandon Road is based on Experian Goad survey data undertaken in April 2022. There are a total of 22 outlets in the District Centre with 36.36% of these being occupied Comparison Retail (8 outlets), approximately 10 percentage points higher than the UK average. There are 2 leisure service outlets (or 9.09%) within the centre which is lower than the UK average of 25.31%. There currently 4 vacant outlets although 2 of these are reportedly under offer.

Table 5.11: Outlets in Brandon Road

	No. Outlets	% of Total Outlets Brandon Road/ Warwickshire Retail Park	% of Total Outlets UK Average
Comparison Retail	9	37.50%	26.87%
Convenience Retail	3	12.50%	9.27%
Retail Services	5	20.83%	15.75%
Leisure Services	2	8.33%	25.31%
Financial & Business Service	1	4.17%	8.75%
Vacant*	4	16.67%	13.85%
Total	24	100.00%	99.80%

Source: February 2023 - based on review of the shopping park website (<http://www.warwickshireshoppingpark.co.uk/>) and Completely Retail (<https://completelyretail.co.uk/scheme/5157>)

5.31 There has been an overall reduction in 5 outlets since 2013, from 27 outlets to 22. In 2013 the majority of outlets were vacant, however the reason for the high vacancy level was that the scheme had only recently been completed and not all of the outlets had been let. Now, the majority of outlets comprise Comparison Retail and Services.

Table 5.12: Change in Outlets 2013-22

	Outlets 2013	Outlets 2022	% Total 2013	% Total 2022	Change in Outlets 2013-22	% Change in Outlets 2013-22
Comparison Retail	6	8	22.2%	36.4%	2	33.3%
Convenience Retail	2	3	7.4%	13.6%	1	50.0%
Services	2	7	7.4%	31.8%	5	250.0%
Vacant	17	4	63.0%	18.2%	-13	-76.5%
Total	27	22	100.0%	100.0%	-5	-18.5%

Source: LSH Audit and Coventry and Shopping Centres Study 2014

5.32 The table below identifies the major retailers located in the centre:

Table 5.13: National Multiple Representation

Convenience	Comparison		Leisure Service	Finance & Business Service
ASDA Living	Barnado's	Boots	Puregym	Coventry Building Society
Greggs	Cancer Research	Card Factory	Costa	Morrisons Filling Station
M&S Simply Food	Next Outlet	HSL		
Morrisons	Sports Direct	O2		

Source: LSH Audit

CANNON PARK (MAJOR DISTRICT CENTRE)

5.33 The Category Goad Report published for Cannon Park is based on a survey undertaken in April 2022. The table below shows that the centre has 36 outlets in total, with a total quantum of 14,391 sqm in floorspace. Comparison Retail has the most outlets with 14, which is around 39% of the overall number of outlets, and Convenience Retail has the largest amount of floorspace with 8,426 sqm, significantly higher than the national average (58.6% compared to 15.5%). The number of Retail Service outlets (7) is slightly higher than the UK average percentage and the amount of floorspace (585 sqm) is slightly lower. There is an underrepresentation of Leisure Service outlets and, in particular, floorspace with the 399 sqm accounting for only 2.78% of the overall floorspace, compared to the UK average of 26.19%. There is only 1 recorded vacant outlet in Cannon Park which means that the total number of vacant outlets and floorspace is substantially lower than the UK average.

Table 5.14: Outlets and Floorspace in Cannon Park

	No. Outlets	% of Total Outlets Cannon Park	% of Total Outlets UK Average	Gross Floorspace (Sqm)	% of Total Floorspace Cannon Park	% of Total Floorspace UK Average
Comparison Retail	14	38.89%	26.87%	4,701	32.67%	30.13%
Convenience Retail	8	22.22%	9.27%	8,426	58.55%	15.47%
Retail Services	7	19.44%	15.75%	585	4.07%	7.23%
Leisure Services	4	11.11%	25.31%	399	2.78%	26.19%
Financial & Business Service	2	5.56%	8.75%	149	1.03%	6.60%
Vacant	1	2.78%	13.85%	130	0.90%	13.79%
Total	36	100.00%	99.80%	14,391	100.00%	99.41%

Source: Experian Category Goad Report - April 2022

5.34 Between 2013 and 2022, the centre saw an overall reduction in 1 outlet, although the most significant reduction was in vacancies which went from 8 to 1. Comparison Retail lost 2 outlets while Convenience Retail gained 5 outlets. The numbers of outlet for Retail Services increased by 30%, from 10 to 13 outlets.

Table 5.15: Change in Outlets 2013-22

	Outlets 2013	Outlets 2022	% Total 2013	% Total 2022	Change in Outlets 2013-22	% Change in Outlets 2013-22
Comparison Retail	16	14	43.2%	38.9%	-2	-12.5%
Convenience Retail	3	8	8.1%	22.2%	5	166.7%
Retail Services	10	13	27.0%	36.1%	3	30.0%
Vacant	8	1	21.6%	2.8%	-7	-87.5%
Total	37	36	99.9%	100.0%	-1	-2.7%

Source: Experian Category Goad Report - April 2022 and Coventry and Shopping Centres Study 2014

5.35 Twenty-one multiples represent a total of 60% of the occupied outlets. Comparison has the most outlets occupied by multiples, however proportionally convenience has the highest representation, with 6 outlets resulting in a 75% representation.

Table 5.16: % Multiple Representation of total outlets

	Multiples 2022	% of Total Outlets
Comparison Retail	8	57%
Convenience Retail	6	75%
Retail Service	4	57%
Leisure services	2	50%
Financial & Business Service	1	50%
Total Multiples	21	60%

Source: LSH

5.36 The table below shows the main national multiples located within the centre. The Tesco supermarket is the main anchor and has 5,300 sqm in floorspace. The other larger stores in the centre include the Wilko with around 1,900 sqm in floorspace and the Aldi supermarket with approximately 1750 sqm in floorspace. The retail type is generally more budget or discount orientated with Aldi, Iceland, Bargain Buys and Peacocks although the centre also has some mid-market operators such as Holland & Barrett.

Table 5.17: National Multiple Representation

Convenience	Comparison	Leisure Service	Retail Service
Aldi	Bargain Buys	Costa	Tesco filling station
Greggs	CEX	Subway	Hays Travel
Holland & Barrett	Peacocks	Simply Gym	
Tesco	Wilko		
Timpson	Card Factory		
Iceland	Boots		
	Sports Direct		

Source: LSH Audit

BALL HILL (DISTRICT CENTRE)

- 5.37 The Category Goad Report published for Ball Hill is based on a survey undertaken in April 2022. There are a total of 101 outlets, which are relatively even representation of commercial town centre categories. Comparison and Convenience Retail total 18 and 19 outlets respectively and provide a combined floorspace of 4,023 sqm. The Convenience Retail offer in Ball Hill is higher than the national average, both in terms of number of outlets and amount of floorspace, while the Comparison Retail offer is the opposite, both outlet numbers and floorspace being substantially lower the UK average.
- 5.38 Retail Services account for the highest number of outlets with 25 which is almost 25% of the overall representation, and the largest quantum of floorspace which is roughly the same percentage as outlets. Leisure Services representation is slightly lower than average, and Financial and Business Services have a slightly higher representation compared to the UK average. There are a total of 6 vacant outlets in the centre which account for 483 sqm in floorspace, much lower than the UK average.

Table 5.18: Outlets and Floorspace in Ball Hill

	No. Outlets	% of Total Outlets Ball Hill	% of Total Outlets UK Average	Gross Floorspace (Sqm)	% of Total Floorspace Ball Hill	% of Total Floorspace UK Average
Comparison Retail	18	17.8%	26.9%	1,672	17.7%	30.1%
Convenience Retail	19	18.8%	9.3%	2,350	24.9%	15.5%
Retail Services	25	24.8%	15.8%	2,062	21.9%	7.2%
Leisure Services	21	20.8%	25.3%	1,867	19.8%	26.2%
Financial & Business Service	12	11.9%	8.8%	994	10.5%	6.6%
Vacant	6	5.9%	13.9%	483	5.1%	13.8%
Total	101	100.0%	99.8%	9,430	100.0%	99.4%

Source: Experian Category Goad Report - April 2022

- 5.39 The table below shows how the sectors have changed since the previous study. Overall, the total number of outlets have gone from 105 in 2013 to 101 in 2022, a reduction of 3.8%. The Comparison Retail offer has almost halved since 2013 and Convenience Retail has increased by 6 outlets (or 46.2%). Vacant outlets have reduced by 40%, from 10 vacant outlets in 2013, down to 6 in 2022.

Table 5.19: Change in Outlets 2013-22

	Outlets 2013	Outlets 2022	% Total 2013	% Total 2022	Change in Outlets 2013-22	% Change in Outlets 2013-22
Comparison Retail	34	18	32.4%	17.8%	-16	-47.1%
Convenience Retail	13	19	12.4%	18.8%	6	46.2%
Retail Services	48	58	45.7%	57.4%	10	20.8%
Vacant	10	6	9.5%	5.9%	-4	-40.0%
Total	105	101	100.0%	100.0%	-4	-3.8%

Source: Experian Category Goad Report - April 2022 and Coventry and Shopping Centres Study 2014

- 5.40 The representation of national multiples in Ball Hill is relatively low with only 13 outlets being occupied by multiples which accounts for 14% of all occupied outlets. The highest proportionate representation of multiples is in the Financial and Business Service Sector with 3 outlets accounting for 25% of the sector. The lowest representation is Retail Services, only 1 outlet and equal to 4% of the representation.

Table 5.20: % National Multiple Representation

	Multiple Outlets 2022	% of Total Outlets
Comparison Retail	1	6%
Convenience Retail	4	21%
Retail Service	1	4%
Leisure services	4	19%
Financial & Business Service	3	25%
Total multiples	13	14%

Source: Experian Category Goad Report - April 2022

- 5.41 The leisure offer in Ball Hill is almost exclusively food and beverage related. The table below shows most of the Leisure Service classifications represented within the centre. The highest number of outlets is represented by Fast Food and Takeaways with a total of 7 outlets and the largest amount of floorspace is occupied by restaurants with a total of 474 sqm which is around 30% of the total Leisure Service offer.

Table 5.21: Food & Beverage Outlets and Floorspace

	F&B Outlets	% of Total Outlets Ball Hill	% of Total Outlets UK Average	F&B Floorspace (SqM)	% of Total Floorspace Ball Hill	% of Total Floorspace UK Average
Bars & Wine Bars	1	1.0%	2.2%	46	0.5%	2.4%
Cafes	4	4.0%	5.0%	288	3.1%	2.8%
Fast Food & Takeaways	7	6.9%	6.1%	418	4.4%	3.0%
Public Houses	1	1.0%	2.6%	316	3.4%	3.5%
Restaurants	4	4.0%	4.9%	474	5.0%	4.2%
Total	17	16.8%	20.8%	1,542	16.3%	15.8%

Source: Experian Category Goad Report - April 2022

- 5.42 The major retailers in Ball Hill are set out in the table below and shows that the main operators in the Convenience Retail sector and Retail Services in Tesco Express, Heron Foods and two banks.

Table 5.22: National Multiple Representation

Convenience	Comparison	Leisure Service	Retail Service
Greggs Heron Nisa Tesco Express	Sense	Subway	Barclays Natwest Vision Express Post Office

Source: LSH Audit

BELL GREEN (DISTRICT CENTRE)

- 5.43 Coventry has eight designated District Centres in the adopted Local Plan of which Bell Green is one.
- 5.44 The Category Goad Report published for Bell Green is based on a survey undertaken in April 2022. Bell Green has a total of 40 outlets the majority of which are from Convenience Retail (12) which accounts for 30% of the overall outlets. Convenience also has the largest quantum of floorspace with a total of 3,632 sqm which results in over 50% of the overall floorspace in Bell Green being represented by this sector, much higher than the UK average of 15.47%. There are 8 Retail Service outlets which occupy 734 sqm of floorspace. Five Leisure Service outlets and 372 sqm of floorspace means that this sector is the most underrepresented with the floorspace accounting for just over 5%

compared to the UK average over 26%. There are a total of 6 vacant outlets, which is 15% of the total number and is similar to the UK average.

Table 5.23: Outlets and Floorspace in Bell Green

	No. Outlets	% of Total Outlets Bell Green	% of Total Outlets UK Average	Gross Floorspace (Sqm)	% of Total Floorspace Bell Green	% of Total Floorspace UK Average
Comparison Retail	9	22.50%	26.87%	1,459	20.31%	30.13%
Convenience Retail	12	30.00%	9.27%	3,632	50.58%	15.47%
Retail Services	8	20.00%	15.75%	734	10.22%	7.23%
Leisure Services	5	12.50%	25.31%	372	5.17%	26.19%
Financial & Business Service	0	0.00%	8.75%	0	0.00%	6.60%
Vacant	6	15.00%	13.85%	985	13.71%	13.79%
Total	40	100.00%	99.80%	7,181	99.99%	99.41%

Source: Experian Category Goad Report - April 2022

- 5.45 Compared to the previous study, the table below shows that there has been an overall reduction in 4 outlets, however on closer inspection this includes a reduction in 7 vacant outlets. The Service based sectors experienced the largest increase in the number of outlets with 4, an increase of 44.4%. Comparison Retail reduced by 2 outlets and Convenience Retail gained 1.

Table 5.24: Change in Outlets 2013-22

	Outlets 2013	Outlets 2022	% Total 2013	% Total 2022	Change in Outlets 2013-22	% Change in Outlets 2013-22
Comparison Retail	11	9	25.0%	22.5%	-2	-18.2%
Convenience Retail	11	12	25.0%	30.0%	1	9.1%
Services	9	13	20.4%	32.5%	4	44.4%
Vacant	13	6	29.5%	15.0%	-7	-53.8%
Total	44	40	99.9%	100.0%	-4	-9.1%

Source: Experian Category Goad Report - April 2022 and Coventry and Shopping Centres Study 2014

- 5.46 Out of the 5 Leisure Service outlets 2 of them were identified as being in the café classification and 2 in the Fast Food % Takeaways classification and only account for 260 sqm in floorspace.
- 5.47 Eleven of the outlets are represented by national multiples, which means that 32% of the occupied outlets are from well-known major retailers. Comparison Retail has the highest representation with 44% while Convenience Retail and Retail Services share the lowest multiple representation at 25%. There are no major retailers within the Financial and Business Sector.

Table 5.25: % Multiple Representation of total outlets

	Multiples (Outlets) 2022	% of Total Outlets
Comparison Retail	4	44%
Convenience Retail	3	25%
Retail Service	2	25%
Leisure services	2	40%
Financial & Business Service	0	0%
Total multiples	11	32%

Source: LSH

5.48 The table below identifies most of the major retailers within the centre. The centre is anchored by Farmfoods and the Post Office is located within the Nisa convenience store.

Table 5.26: National Multiple Representation

Convenience	Comparison	Leisure Service	Retail Service
Farmfoods	Around a Pound	Domino's	Post Office
Food Plus	ExtraCare	Betfred	
Mace	Lloyds Pharmacy		
Nisa			

Source: LSH Audit

DAVENTRY ROAD (DISTRICT CENTRE)

5.49 The Category Goad Report published for Daventry Road is based on a survey undertaken in April 2022. There are total of 50 outlets in Daventry Road, which occupy 5,110 sqm of floorspace. Together, Comparison and Convenience Retail have 20 outlets combined (40%) and almost 2,500 sqm of floorspace, which accounts for just under half of the overall floorspace. Individually, Comparison floorspace is almost half that of the national average and Convenience floorspace is double that of the national average. Retail Services also have a much higher representation in both outlet numbers and total floorspace compared to the UK average while Leisure Services are underrepresented in both. Ten percent of outlets are from the Financial & Business Service (5) and 548 sqm accounts for 10.73%, both slightly higher than the average. There are a total of 7 vacant outlets in the centre, 14% of the total outlets which account for 437 sqm or 8.55%.

Table 5.27: Outlets and Floorspace in Daventry Road

	No. Outlets	% of Total Outlets Daventry Rd	% of Total Outlets UK Average	Gross Floorspace (sqm)	% of Total Floorspace Daventry Rd	% of Total Floorspace UK Average
Comparison Retail	12	24.00%	26.87%	808	15.82%	30.13%
Convenience Retail	8	16.00%	9.27%	1,654	32.36%	15.47%
Retail Services	12	24.00%	15.75%	1,171	22.91%	7.23%
Leisure Services	6	12.00%	25.31%	492	9.64%	26.19%
Financial & Business Service	5	10.00%	8.75%	548	10.73%	6.60%
Vacant	7	14.00%	13.85%	437	8.55%	13.79%
Total	50	100.00%	99.80%	5,110	100.01%	99.41%

Source: Experian Category Goad Report - April 2022

5.50 Similar to Bell Green, the centre does not have much Leisure Service offer, the most floorspace occupied by casinos / betting offices, approximately 185 sqm.

5.51 The table below shows that the centre has gained 3 outlets since 2013, this comprises a reduction in Comparison outlets by 5 and Convenience by 1 and an increase in Service and Vacant outlets, both by 4 outlets. This results in an overall increase of 6.4%.

Tables 5.28: Change in Outlets 2013-22

	Outlets 2013	Outlets 2022	% Total 2013	% Total 2022	Change in Outlets 2013-22	% Change in Outlets 2013-22
Comparison Retail	16	12	34.0%	24.0%	-4	-25.0%
Convenience Retail	9	8	19.1%	16.0%	-1	-11.1%
Services	19	23	40.4%	46.0%	4	21.1%
Vacant	3	7	6.4%	14.0%	4	133.3%
Total	47	50	100.0%	100.0%	3	6.4%

Source: Experian Category Goad Report - April 2022 and Coventry and Shopping Centres Study 2014

- 5.52 There are 19 multiples in Daventry Road centre, which is 44% of all occupied outlets. The highest representation of multiples is in the Financial & Business Service sector and the lowest representation has been identified in Comparison Retail with 17%.

Table 5.29: % Multiple Representation of total outlets

	Multiples (Outlets) 2022	% of Total Outlets
Comparison Retail	2	17%
Convenience Retail	4	50%
Retail Service	5	42%
Leisure services	4	67%
Financial & Business Service	4	80%
Total multiples	19	44%

Source: Experian Category Goad Report - April 2022

- 5.53 The table below lists the majority of major retailers within the town centre. The major operators in the Financial and Business Service sector are largely banks and the centre is anchored by the Asda.

Table 5.30: National Multiple Representation

Convenience	Comparison	Leisure Service	Finance & Business Service
Asda	Boots	Subway	Lloyds Bank
Timpson	Card Factory	Domino's Pizza	Specsavers
Greggs		William Hill	HSBC UK
		Bet Fred	Coventry Building Society
			Post Office
			Boots Opticians

Source: LSH Audit

BRADE DRIVE (DISTRICT CENTRE)

- 5.54 Brade Drive District Centre forms part of the wider Walgraves Retail Park which expands north of the centre boundary and contains large format outlets comprising a wider range of retail and services. There are a total of 7 outlets in Brade Drive centre with a total floorspace of 11,330 sqm. The centre itself comprises mostly of Retail Services (4) however in relation to floorspace the centre almost entirely comprises Convenience Retail and Leisure Services. This is a result of the large Asda supermarket (8,290 sqm) and Buzz Bingo (2,660 sqm) outlets which account for over 97% of the overall centre floorspace.
- 5.55 It is important to note that the large number of commercial outlets surrounding the retail park are effectively out-of-centre, however due to the close proximity (immediately adjacent) they would serve

as the same centre. The surrounding area contains large retailers such as Home Bargain, Tesco Extra and Leisure Services such as Showcase Cinema and Tenpin Bowling Alley.

Table 5.31: Outlets and Floorspace in Brade Drive

	No. Outlets	% of Total Outlets Brade Drive	% of Total Outlets UK Average	Gross Floorspace (sqm)	% of Total Floorspace Brade Drive	% of Total Floorspace UK Average
Comparison Retail	0	0.00%	26.87%	0	0.00%	30.13%
Convenience Retail	2	28.57%	9.27%	8,340	73.61%	15.47%
Retail Services	4	57.14%	15.75%	330	2.91%	7.23%
Leisure Services	1	14.29%	25.31%	2,660	23.48%	26.19%
Financial & Business Service	0	0.00%	8.75%	0	0.00%	6.60%
Vacant	0	0.00%	13.85%	0	0.00%	13.79%
Total	7	99.99%	99.80%	11,330	100.00%	99.41%

Source: Experian Category Goad Report - April 2022

5.56 The table below shows the change in outlets since 2013. The reduction in two Comparison outlets may be due to a change in the centre boundaries since the last study as currently the centre does not include the outlets directly north where Pets at Home is located.

Table 5.32: Change in Outlets 2013-22

	Outlets 2013	Outlets 2022	% Total 2013	% Total 2022	Change in Outlets 2013-22	% Change in Outlets 2013-22
Comparison Retail	2	0	33%	0%	-2	-100.0%
Convenience Retail	2	2	33%	29%	0	0.0%
Services	2	5	33%	71%	3	150.0%
Vacant	0	0	0%	0%	0	0.0%
Total	6	7	99%	100%	1	16.7%

Source: Experian Goad and Coventry and Shopping Centres Study 2014

EARLSDON (DISTRICT CENTRE)

5.57 An audit of Earlsdon was undertaken by LSH by way of a street survey of outlets in January 2023. The audit recorded a total of 58 outlets in Earlsdon. Comparison and Convenience Retail together total 20 outlets, which accounts for approximately 35% of the overall outlet numbers and on par with the UK average. Retail Service is almost 10 percentage points higher than the UK average (24.14% compared to 15.75%). Leisure Service has the highest proportion of outlets (18) which is a 31.03% representation and slightly above the UK average. There are 5 vacant outlets identified which equals to 8.62% and is lower than the UK average of 13.85%.

Table 5.33: Outlets in Earlsdon

	No. Outlets	% of Total Outlets Earlsdon	% of Total Outlets UK Average
Comparison Retail	13	22.41%	26.87%
Convenience Retail	7	12.07%	9.27%
Retail Services	14	24.14%	15.75%
Leisure Services	18	31.03%	25.31%
Financial & Business Service	1	1.72%	8.75%
Vacant	5	8.62%	13.85%
Total	58	100.00%	99.80%

Source: LSH Audit

- 5.58 Since 2013 the overall number of outlets has decreased by 1 (from 59 to 58). The most substantial change was in Comparison Retail which experienced a loss of 9 outlets, going from 22 down to 13 outlets. The largest increase in outlets was in vacant outlets which increased by 5, from 0 to 5.

Table 5.34: Change in Outlets 2013-22

	Outlets 2013	Outlets 2022	% Total 2013	% Total 2022	Change in Outlets 2013-22	% Change in Outlets 2013-22
Comparison Retail	22	13	37.3%	22.4%	-9	-40.9%
Convenience Retail	8	7	13.6%	12.1%	-1	-12.5%
Services	29	33	49.2%	56.9%	4	13.8%
Vacant	0	5	-	8.6%	5	-
Total	59	58	100.1%	100.0%	-1	-1.7%

Source: LSH Audit and Coventry and Shopping Centres Study 2014

- 5.59 The table below identifies the food and beverage based Leisure Services and shows that the majority comprises restaurants (6) and cafes (5), which represents 8.62% and 10.34% respectively and is above the UK average of 5% and 4.89%.

Table 5.35: Food and Beverage Outlets

	F&B Outlets	% of Total Outlets Earlsdon	% of Total Outlets UK Average
Bars & Wine Bars	0	0.00%	2.24%
Cafes	5	8.62%	5.00%
Fast Food & Takeaways	2	3.45%	6.05%
Public Houses	1	1.72%	2.60%
Restaurants	6	10.34%	4.89%
Total	14	24.14%	20.78%

Source: LSH Audit

- 5.60 The table below lists the main retailers within the centre. There are two main convenience stores with the Co-op and One Stop and several comparison retail multiples are from charity organisations:

Table 5.36: National Multiple Representation

Convenience	Comparison	Leisure Service	Finance & Business Service
Co-operative	Age UK	Wetherspoon's	Post Office
One Stop	Lloyds Pharmacy	Subway	
Greggs	Sense		

Source: LSH Audit

FOLESHILL (DISTRICT CENTRE)

- 5.61 The audit data obtained for Foleshill is based on a survey area undertaken by Experian Goad in April 2022 which expands well beyond the defined district centre. As a result of the boundary differences we are unable to compare the Experian Goad data against the Land Use Survey data from 2012. Therefore, the audit is based on the profile of outlets and floorspace within the Experian Goad survey area.
- 5.62 Experian Goad identifies a total of 149 outlets with an overall floorspace of 15,561 sqm. Retail has an overall number of 65 outlets (Comparison having 32 and Convenience with 33) and a combined floorspace of 6,782 sqm (2,852 sqm and 3,930 sqm respectively). Convenience offer is above the

UK average while Comparison offer is below the UK average (both in relation to outlets numbers and amount of floorspace).

- 5.63 Retail (27) and Leisure Services (28) has a similar number of outlets however Retail Services have 1,765 sqm of floorspace and Leisure Services have 3,363 sqm, which accounts for around 11% and 21% of overall floorspace. Compared to the UK floorspace averages, Retail Services has more representation in Foleshill and Leisure Services have slightly less representation. There are 13 Financial & Business service outlets with 1,180 sqm of floorspace which is similar to the UK average.
- 5.64 There are 16 vacant outlets and this results in 2,471 sqm in vacant floorspace, which is only marginally higher than UK average (15.88% compared to 13.79%).

Table 5.37: Outlets and Floorspace in Coventry City Centre

	No. Outlets	% of Total Outlets Foleshill	% of Total Outlets UK Average	Gross Floorspace (Sqm)	% of Total Floorspace Foleshill	% of Total Floorspace UK Average
Comparison Retail	32	21.48%	26.87%	2,852	18.33%	30.13%
Convenience Retail	33	22.15%	9.27%	3,930	25.25%	15.47%
Retail Services	27	18.12%	15.75%	1,765	11.34%	7.23%
Leisure Services	28	18.79%	25.31%	3,363	21.61%	26.19%
Financial & Business Service	13	8.72%	8.75%	1,180	7.58%	6.60%
Vacant	16	10.74%	13.85%	2,471	15.88%	13.79%
Total	149	100.00%	99.80%	15,561	100.00%	99.41%

Source: Experian Category Goad Report - April 2022

- 5.65 Out of the 28 Leisure Service outlets there are 18 which are food and beverage based. This comprises of 3 cafes, 11 fast food & takeaways and 4 restaurants and there are no bars or public houses. Compared to the UK averages, there is much more representation of fast food and takeaways.

Table 5.38: Food & Beverage Outlets and Floorspace

	F&B Outlets	% of Total Outlets Foleshill	% of Total Outlets UK Average	F&B Floorspace (sqm)	% of Total Floorspace Foleshill	% of Total Floorspace UK Average
Bars & Wine Bars	0	0.00%	2.24%	0	0.00%	2.20%
Cafes	3	2.01%	5.00%	204	1.31%	2.73%
Fast Food & Takeaways	11	7.38%	6.05%	966	6.21%	2.90%
Public Houses	0	0.00%	2.60%	0	0.00%	3.47%
Restaurants	4	2.68%	4.89%	325	2.09%	4.11%
Total	18	12.07%	20.78%	1,496	9.61%	15.41%

Source: Source: Experian Category Goad Report - April 2022

- 5.66 The Category Report identified very few multiples, only 6 in total within the Goad boundary which is a total of 4% of outlets are represented by multiples and the table below shows the few main retailers within the area. This includes operators such as Greggs, Paddy Power and Lloyds Bank.

JARDINE CRESCENT (DISTRICT CENTRE)

- 5.67 An audit of outlets in Jardine Crescent was undertaken by way of a street survey in January 2023. The audit recorded a total of 21 outlets in the centre with a relatively even spread across most sectors, with the exception of Financial & Business Services. Comparison and Convenience Retail have a total of 9 outlets, representing over 42% of all outlets. The representation of Comparison

Retail is below the UK average (19.05% compared to 26.87%) and the proportion of Convenience Retail outlets is well above the UK average (23.81% compared to 9.27%). Retail Service has 6 outlets which is the highest number of outlets and accounts for 28.57% and almost double the UK average. Five Leisure Service outlets account for just under a quarter of the overall outlets, in line with the UK average. There were no Financial and Business Service identified and only 1 vacant outlet (4.76% of the total floorspace) meaning the amount of vacant outlets in the centre is lower than UK average.

Table 5.39: Outlets in Jardine Crescent

	No. Outlets	% of Total Outlets Jardine Crescent	% of Total Outlets UK Average
Comparison Retail	4	19.05%	26.87%
Convenience Retail	5	23.81%	9.27%
Retail Services	6	28.57%	15.75%
Leisure Services	5	23.81%	25.31%
Financial & Business Service	0	0.00%	8.75%
Vacant	1	4.76%	13.85%
Total	21	100.00%	99.80%

Source: LSH Audit

- 5.68 Compared to the 2013 figures, the centre has gained 1 outlet overall. Services increased from 8 outlets to 11, an increase of 37.5% and Comparison Retail and Vacant outlets both reduced by 1.

Table 5.40: Change in Outlets 2013-22

	Outlets 2013	Outlets 2022	% Total 2013	% Total 2022	Change in Outlets 2013-22	% Change in Outlets 2013-22
Comparison Retail	5	4	25%	19.0%	-1	-20.0%
Convenience Retail	5	5	25%	23.8%	0	0.0%
Services	8	11	40%	52.4%	3	37.5%
Vacant	2	1	10%	4.8%	-1	-50.0%
Total	20	21	100%	100.0%	1	5.0%

Source: LSH Audit and Coventry and Shopping Centres Study 2014

- 5.69 The majority of Leisure Services comprise Fast Food & Takeaways, with 3 outlets of the 5 total representing 60% (14.29% of the overall number of outlets). Including the 1 identified Café, this results in 80% of Leisure Service being represented by food and beverage occupants.

Table 5.41: Food & Beverage Outlets and Floorspace

	F&B Outlets	% of Total Outlets Jardine Crescent	% of Total Outlets UK Average
Bars & Wine Bars	0	0.00%	2.24%
Cafes	1	4.76%	5.00%
Fast Food & Takeaways	3	14.29%	6.05%
Public Houses	0	0.00%	2.60%
Restaurants	0	0.00%	4.89%
Total	4	19.05%	20.78%

Source: LSH Audit

- 5.70 The major retailers are listed in the following table and shows that most of the multiples are within the Convenience Retail sector:

Table 5.42: National Multiple Representation

Convenience	Comparison	Leisure Service	Retail Service
Greggs	Boots	Ladbrokes	Post Office
Nisa Local			
Costcutter			
Farmfoods			

Source: LSH Audit

JUBILEE CRESCENT (DISTRICT CENTRE)

- 5.71 An audit of outlets in Jubilee Crescent was undertaken by way of a street survey in January 2023. The audit recorded a total of 41 outlets in the centre, just over half of which comprise Comparison and Convenience Retail (31.71% and 19.51% respectively). The representation of Comparison Retail is slightly above the UK average while the representation of Convenience Retail is over double the UK average. The number of Retail and Leisure Service outlet representation within the centre is on par with UK average while Financial and Business Service is under represented compared to the UK average. There are a total of 2 vacant outlets which account for 4.88% and this is much lower than the UK average of 13.85%.

Table 5.43: Diversity of Outlets in Jubilee Crescent

	No. Outlets	% of Total Outlets Jubilee Crescent	% of Total Outlets UK Average
Comparison Retail	13	31.71%	26.87%
Convenience Retail	8	19.51%	9.27%
Retail Services	6	14.63%	15.75%
Leisure Services	10	24.39%	25.31%
Financial & Business Service	2	4.88%	8.75%
Vacant	2	4.88%	13.85%
Total	41	100.00%	99.80%

Source: LSH Audit

- 5.72 There has been a reduction in one Convenience Retail outlet, while an extra outlet has been recorded each for Comparison Retail, Services and Vacancies.

Table 5.44: Change in Outlets 2013-22

	Outlets 2013	Outlets 2022	% Total 2013	% Total 2022	Change in Outlets 2013-22	% Change in Outlets 2013-22
Comparison Retail	12	13	30.8%	31.7%	1	8.3%
Convenience Retail	9	8	23.1%	19.5%	-1	-11.1%
Services	17	18	43.6%	43.9%	1	5.9%
Vacant	1	2	2.6%	4.9%	1	100.0%
Total	39	41	100.1%	100.0%	2	41.4%

Source: LSH Audit and Coventry and Shopping Centres Study 2014

- 5.73 Out of the 10 identified Leisure Service outlets, 8 are food and beverage based. The majority comprise Fast Food & Takeaways (7 outlets) and accounts for 17.07% of the overall outlets.

Table 5.45: Food & Beverage Outlets and Floorspace

	F&B Outlets	% of Total Outlets Jubilee Crescent	% of Total Outlets UK Average
Bars & Wine Bars	0	0.00%	2.24%
Cafes	0	0.00%	5.00%
Fast Food & Takeaways	7	17.07%	6.05%
Public Houses	0	0.00%	2.60%
Restaurants	1	2.44%	4.89%
Total	8	19.51%	20.78%

Source: LSH Audit

5.74 The table below lists the major retailers located within the centre. For a smaller centre, there is good level of representation from national multiples. The majority of comparison retail is biased towards budget and discount operators, such as B&M, and charity shops. The centre is anchored by an Asda store and is supported by smaller convenience outlets.

Table 5.46: National Multiple Representation

Convenience	Comparison	Leisure Service	Retail Service
Tesco Express	B&M Express Age UK	Domino's	Texaco
Nisa Local	Tesco Clothing Lloyds Pharmacy	Subway	
Costcutter	Boots	William Hill	
Asda	Barnardo's		
Greggs			

Source: LSH Audit

SUMMARY

5.75 The tables below summarise how the centres compare to each in relation to the proportion of outlets and floorspace, and against the UK average identified by Experian Goad. This has been separated into Coventry City Centre and the Major District Centres, as they all have both outlet and floorspace data, and the district centres which summarise outlets proportions only. The comparisons against the UK average are easily identified using a traffic light system. Green denotes when the proportion of outlets/ floorspace is on par or above the UK average for the category in question. Amber denotes where representation is just below the UK average, and red is where representation is well below the UK average.

Table 5.47: Diversity of Uses by Outlets for Coventry City Centre and Major District Centres

Outlets %	Coventry City Centre	Arena Park	Brandon Road	Cannon Park	UK Average
Comparison Retail	20%	42%	37.5%	39%	26.87%
Convenience Retail	8%	11%	12.5%	22%	9.27%
All Retail	28%	53%	50%	61%	
Retail Service	10%	18%	20.8%	19%	15.75%
Leisure Service	30%	13%	8.3%	11%	25.31%
Financial & Business Service	11%	3%	4.2%	6%	8.75%
Vacant	21%	13%	16.7%	3%	13.85%
Total	100%	100%	100%	100%	

Source: Experian Category Goad Report - April 2022

Table 5.48: Diversity of Uses by Floorspace for Coventry City Centre and Major District Centres

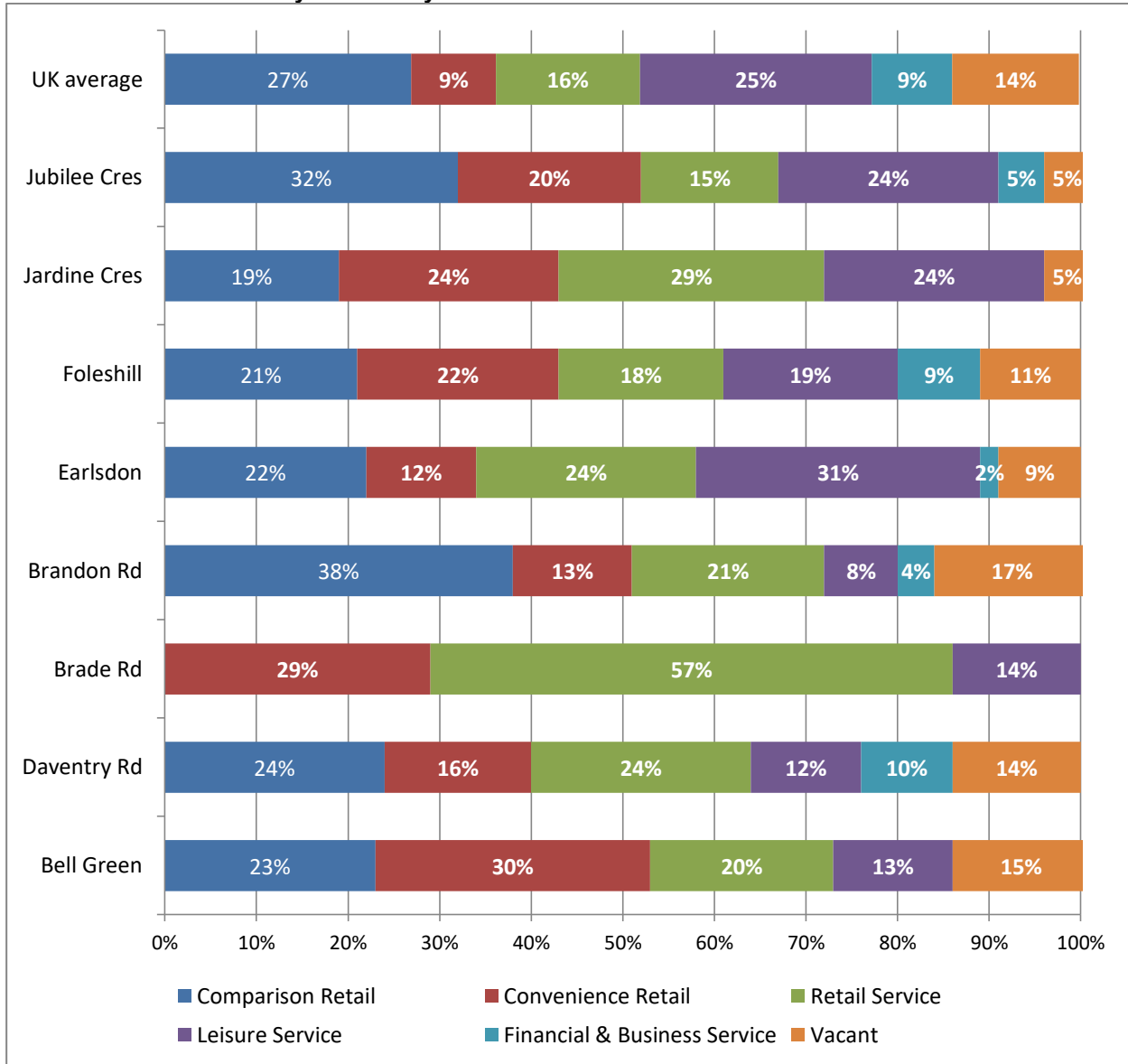
Floorspace %	Coventry City Centre	Arena Park	Brandon Road	Cannon Park	UK Average
Comparison	22%	48%	-	33%	30.13%
Convenience	9%	37%	-	59%	15.47%
All Retail	31%	85%	-	92%	
Retail Service	2%	3%	-	4%	7.23%
Leisure Service	33%	6%	-	3%	26.19%
Financial & Business Service	7%	1%	-	1%	6.60%
Vacant	27%	5%	-	1%	13.79%
Total	100%	100%	-	100%	

Source: Experian Category Goad Report - April 2022

Note: Floorspace data is not available for Brandon Road.

- 5.76 The tables show that Coventry City Centre has a lower than average proportion of Retail and Retail Service offer compared to the average for all centres in the UK, and in addition has a high level of vacant outlets and floorspace. The tables also demonstrate how each centre has a different commercial focus, with Arena Park providing the highest proportion of Comparison Retail floorspace (as a % of total floorspace), Ball Hill has the highest proportion of Retail Service floorspace and Cannon Park has the highest proportion of convenience floorspace, when compared against UK averages.
- 5.77 The figure below summarises the proportion of outlets throughout the district centres and how representation by category compares to the UK average. It shows a reasonable level of commercial representation across all centres. Of note, Bell Green is more convenience retail focused; Brandon Road is more Comparison Retail focused and Earlsdon is more Leisure Service focused. Brade Road appears to be the one centre that has limited offer across all commercial categories, however it has already been identified that the centre is immediately adjacent Walsgrave Retail Park, which provides more commercial offer.

Table 5.48: Diversity of Uses by Outlets for District Centres



Source: LSH Audit and Experian Goad

6. PRELIMINARY TOWN CENTRE POLICY ADVICE

- 6.1 This section provides an early indication on town centre related policies within adopted Development Plan Documents that will need to be reviewed and amended based the review of current national policy and guidance and the findings of the desktop assessment of retail and leisure sector trends, Coventry's retail context, and the evolution of town centre uses within the City's network of centres.
- 6.2 The review focuses on policies within the adopted Coventry City Local Plan ('the Local Plan') and the Coventry City Area Action Plan ('the AAP'), and takes account of policy recommendations within the Coventry Shopping and Centres Study 2014 ('2014 SCS').

Supporting New Retail and Leisure Development

- 6.3 The National Planning Policy Framework states that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change" (paragraph 11a). Furthermore, in preparing development plans, "*policies should be underpinned by relevant and up-to-date evidence*" (paragraph 31).
- 6.4 As such, the figures in the current Local Plan are based on the 2014 SCS, informed by the 2011 Census and Coventry City Council Land Use Survey (2013). While it is common for Local Plans to state capacity figures for new retail and leisure floorspace in policies that seek to prioritise new development in town centre locations, such as **Local Plan Policy DS1** (Overall Development Needs), and **AAP Policy CC18** ('The Primary Shopping Area'), any figures identified from Stage 2 are likely to show no or limited capacity for new floorspace.
- 6.5 It is difficult to predict how the retail markets will evolve given the considerable changes that have occurred within a short period of time. Furthermore, the absence of capacity figures will not correlate to a lack of demand from the market, which the Stage 2 study is expected to identify, particularly within the convenience retail sector where there is strong demand from the sector for new discount foodstores. As such, while **Local Plan Policy DS1** and **AAP Policy CC18** will need to be updated, at this stage will advise that reference to capacity figures are not stated and should be informed by a holistic overview of the retail context for Coventry by taking account of market led demand within the retail and leisure sectors.
- 6.6 This also relates to **AAP Policy CC14** which refers to a need for 6,500 sqm of new leisure floorspace in relation to the Spire House and Christchurch House office buildings site. This policy will require to be updated, both in terms of references to floorspace, but also in response to whether there is still market demand to support leisure on these sites and their current development status. However, it is noted that Spire House is located adjacent to The Wave (indoor waterpark), which is likely to support the building's continued use for food and beverage offer.
- 6.7 Linked to the above, there will be a need to update **Local Plan Policy R1** (Delivering Retail Growth) and other policies in the Local Plan AAP that specifically identify floorspace allocations for retail and leisure uses to reflect revised need and demand for retail and leisure floorspace. This affects the following policies:
- **Local Plan Policy CC12** (The Business Area – Friargate)
 - **AAP Policy CC14** (The Civic Area)
 - **AAP Policy CC17** (Leisure and Entertainment Area)
 - **AAP Policy CC19** (Primary Shopping Area regeneration – South)
 - **AAP Policy CC20** (Primary Shopping Area regeneration – North)

- 6.8 The outputs of the retail and leisure needs assessment and market demand assessment will inform whether the current allocation of undeveloped allocated sites for retail and leisure can be reasonably supported.

Supporting the Role and Function of Centres

- 6.9 Paragraph 86 of the NPPF states that policies should define the extent of town centres and Primary Shopping Areas (PSAs). The expectation in national policy that primary and secondary frontages need to be defined in the NPPF was removed in 2018. Although, the National Planning Practice Guidance clarifies that this does not preclude authorities from doing so where there use can be justified, is not a requirement. Furthermore, the introduction of Use Class in the amended Use Class Order now renders policies on primary and secondary frontages difficult to implement, given the flexibility now afforded to commercial activities within this new Use Class.
- 6.10 This is particularly relevant for **Local Plan Policy R3** (The Network of Centre) which seeks to maintain a minimum threshold of former Class A uses within the City's network of main centres. This will be difficult to control. Additionally, **Local Plan Policy R5** (Retail Frontages and Ground Floor Units in defined centres), emphasises the importance of Retail Frontages and **AAP Policy CC22**, which seeks a minimum threshold for retail use also states that "*as required by the NPPF primary and secondary frontages are defined with the PSA*". Given the issues surrounding the implementation of retail frontage thresholds these policies hold little weight and should be removed or in the case of Local Plan Policy R3 amended to exclude references to minimum threshold for retail uses.
- 6.11 However, national policy and guidance still supports the adoption of Town Centre Boundaries and Primary Shopping Areas (PSAs), which will support policies that relate to managing the development of new retail floorspace that is not located within a defined centre. Therefore, a greater focus should be placed on defining PSAs which was recommended in the 2014 SCS, which stated "*the designation of centre boundaries and primary shopping areas within these boundaries are more important issues... as they define whether sites are within centre, edge-of-centre or out-of-centre.*"
- 6.12 Currently, there is only a defined Primary Shopping Area for Coventry City, which informs **AAP Policy CC18 (The Primary Shopping Area)**. It is recommended that the Council define PSAs for the District Centres, which in turn inform Local Plan policies on managing proposals for edge and out of centre retail development (including redevelopment, refurbishment, extension of existing edge and out of centre retail facilities).

Managing Edge and Out of Centre Retail and Other Main Town Centre Use Proposals

- 6.13 For the purpose of assessing the sequential and impact tests for retail proposals at locations that are not within a defined centre the NPPF classifies such locations as either being edge of centre or out of centre. Edge of centre is defined in the NPPF as "*a location that is well connected to, and up to 300 metres from, the primary shopping area*" (Glossary, NPPF).
- 6.14 For other town centre uses, edge of centres is measured as "*a location within 300 metres of a town centre boundary*", but extending to 500 metres for office development proposals that are "within 500 metres of a public transport interchange" (Glossary, NPPF).
- 6.15 **Local Plan Policy R4** (Out of Centre Proposals) refers to the sequential approach and how it should be applied to retail and main town centre uses in respect to the Sequential and Impact Tests. However, policy appears to define edge of centre as 300m from a centre boundary, which we take to be the defined town centre boundary. For the policy to align with the NPPF, Policy R4 should be amended to qualify edge of centre locations as 300m from a defined PSA in respect to retail

proposals and 300m from a defined town centre boundary in respect to other main town centre uses. This will tie in with the recommendation to adopt PSAs for the City's district centres.

Local Impact Thresholds

- 6.16 Paragraphs 87-91 of the NPPF set out the requirement to apply the sequential and impact tests and provide a 'catch-all' threshold for Sequential Assessments. The Council introduced a threshold for impact tests below that identified in the NPPF based on the recommendations of the 2014 SCS. This stated that the Council could pursue application of guidance within the NPPF, particularly relating to the sequential approach and impact tests for locally set thresholds in determining out-of-centre retail and other development proposals that generate significant numbers of trips.
- 6.17 **Criterion 3a of Local Plan Policy R4** requires that proposals for retail and main town centres uses proposals outside a defined centre that exceed 1,000 sqm (gross) floorspace are accompanied by an Impact Test. While the threshold is likely to remain appropriate for edge of centre proposals to Coventry City Centre, we consider that the threshold is too high in respect to edge and out of centre proposals that relate to the City's district centres. This is particularly relevant given the size of the smaller district centres where a retail scheme of 1,000sqm (gross) at an edge or out of centre location would be inappropriate in scale compared to the overall retail floorspace of the nearby centre. The Council should have more control in identifying where such schemes would have a significant impact on the centre. Therefore, recommendations that will come forward in Stage 2 of the study are expected to provide variations to the local floorspace threshold that will be proportionate to Coventry City Centre, Major District Centres, and District Centres.

Managing Hot Food Takeaway Uses

- 6.18 The prevalence of hot food takeaways is an issue that many local authorities across England are grappling with, particularly where they can proliferate within retail areas of town centres and near schools. Local Plan **Policy R6 (Restaurants, Bars and Hot Food Takeaways)** goes some way to attempt to manage hot food takeaway uses alongside restaurant and bar uses by focusing these uses within defined centres. Where proposals are located outside of defined centres they must demonstrate that they will not significantly harm the amenity of nearby residential areas or highways. Restaurant uses now fall within Use Class E so this commercial activity will be controlled within policy specific to main town centre uses (e.g. any revisions to Local Plan Policy R4). Bars (and other drinking establishments) and hot food takeaways now fall under Sui Generis.
- 6.19 For hot food takeaways in particular, the Council may wish to apply stricter controls on managing new hot food takeaway proposals by applying measures that limit their frontage or number of outlets within town centre frontages. Unlike for Use Class E activities, policies that control hot food takeaways within town centres can be implemented more effectively, particularly if it relates to a defined PSA. Exclusion zones can also be applied to areas close to schools, which many local authorities have adopted in policy.
- 6.20 Other measures adopted by local authorities include preventing or limiting the number of hot food takeaways that can trade from new centres serving new residential communities.

New Use Class Order

- 6.21 Due to the change in Use Class (the new Class E) the Local Plan, Area Action Plan and the 2014 SCS refer to Use Classes A1-A5. The current Use Classes were last updated on September 2020 and Use Classes A1 (shops), A2 (financial and professional services) and A3 (restaurants and cafes) have been replaced with a new Use Class E. Class A4 (restaurants and cafes) and Class A5 (Hot food takeaways) are not covered by Use Class E but are now defined as "Sui Generis".

- 6.22 Other Uses now subsumed under the new Use Class E include B1 (commercial, business and service uses), Class D1 (non-residential institutions) and Class D2 (assembly and leisure). Council may want to specify retail floorspace similar to how we identify it in this study, Convenience, Comparison and Service based commercial classifications.
- 6.23 Furthermore, there are now limitations to what Local Plan policies can achieve in guiding development given that the planning reforms on Permitted Development Rights is encouraging a more market led approach to support town centre economies. There are likely to be unintended consequences of this new approach, particularly in respect to achieving the right mix of uses and ensuring that centres continue to appeal to shoppers, other centre users and visitors, workers and residents. Currently, there does not appear to be much references made in relation to PDR in the DPDs. Permitted Development Rights could also impact the town as this allows retail to come forward without the need to consider the sequential or impact test, potentially leading to a loss in retail. The Council may wish to consider Article 4 Directions to protect town centres uses within defined centres.

SUMMARY

- 6.24 The policy advice set out in this section provides an indication on what policies are likely to need amendment or where new policies should be considered. However, the policy advice is based on a desktop review of evidence that is relatively limited in scope and will require further evidence to support recommendations made and may be subject to change following the completion of more detailed evidence as part of Stage 2 of the Coventry Retail and Centres Study.
- 6.25 Stage 2 will be informed by findings of the Retail and Leisure Needs Assessment which will take account of more up to date economic forecasts, the findings of a household survey on retail and leisure expenditure and habits, a market demand assessment, and feedback from key city centre and district centre stakeholders. This will help provide a more informed view on policy recommendations.

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APPENDIX 1: PLAN OF CENTRES IN COVENTRY CITY