

PLANNING, REGENERATION + INFRASTRUCTURE

COVENTRY RETAIL & CENTRES STUDY

STAGE 2 REPORT

FINAL REPORT

FEBRUARY 2024



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Signed:

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For and on behalf of Lambert Smith Hampton

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EXECUTIVE SUMMARY

- i. This report has been prepared by Lambert Smith Hampton on the instructions of Coventry City Council and forms part of the evidence base to inform the Council's review of the local development plan. It provides an updated, robust and sound evidence base on retail and main town centre uses in Coventry to help formulate strategies and policies in the emerging plan.
- ii. This, Stage 2 report follows the preparation of a **Stage 1: Issues & Options Topic Paper** which was published in April 2023 and provided 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.
- iii. This report provides a new, comprehensive evidence base to inform the emerging plan and includes new research on shopping behaviour in the City and assessments of the health of the defined town centres. These, together with consideration of current and emerging market trends informs the advice we provide on possible town centre policy changes and other matters that the Council may wish to consider when reviewing their local plan.

MARKET TRENDS

- iv. The Stage 1 report highlighted how the pandemic had accelerated the growth in market share of online / non store retailing and the latest information from Experian confirms that this trend is continuing. At the same time economic uncertainty and the rising cost of living is leading to reduced expenditure overall. As a result, the retail sector continues to face major challenges and 2023 has seen further retail business failures.
- v. The retail centres within Coventry have faced the same challenges as those in the rest of the UK, with differing effects given the unique offer and catchment each serves. Coventry City Centre has seen the closure of the likes of Ikea and more recently Wilko and this has contributed to the decline in comparison retail offer in the City Centre.
- vi. The Major District Centres and District Centres have also been vulnerable to the loss of national multiples, with Cannon Park MDC seeing the closure of Wilko and Arena Park MDC New Look as examples. However, these centres generally have a greater reliance on convenience provision and a stronger independent offer.
- vii. The commercial leisure sector, which includes restaurants, cafes etc and recreational, cultural and sporting venues has also experienced major changes and challenges in recent years but with leisure spend expected to increase in real terms in the future, such uses will continue to be an important component of a town centre's offer.
- viii. The food and beverage sector is particularly significant as participation and spend per person is high and the uses complement the retail offer in town centres, extending dwell time. However, since 2017 a number of multiples in the casual dining sector have struggled following rapid and unsustainable growth.
- ix. The growth in home deliveries is also a significant challenge to more traditional F&B operators and comes on top of the impact of the COVID-19 pandemic, sharp rises in energy prices and more difficulties in recruiting staff. This has led to a radical restructuring of businesses across the sector, resulting in the closure of many loss-making branches.
- x. However, at the same time, the popularity of street food, market halls and markets, and "meanwhile"/"pop-up" restaurants and bars has opened more opportunities for start-up hospitality brands and have served as a launch pad for many successful F&B brands (e.g. Honest Burger and Franco Manca).

- xi. Other leisure activities are also facing changes and challenges as a result of changing technologies and the impact of the pandemic and consumers are becoming increasingly selective in terms of where and how they spend their discretionary leisure spending. Successful businesses are continuing to come forward but some existing businesses are failing to adapt quickly enough and business failures continue.
- xii. Within Coventry, the City Centre has historically been the main draw for leisure activities and has a strong and varied offer of F&B outlets and range of leisure activities, including a theatre, multiplex cinema and casino. Live music venues include the hmv Empire and a range of smaller venues. There is also a choice of nightclubs and a good range of sports and fitness venues.
- xiii. Elsewhere in Coventry there is a range of leisure provision both within and outside of the Major District Centres and district centres. The F&B offer within most centres has increased over time reflecting national trends.

COVENTRY'S CENTRES

- xiv. Coventry contains a range of centres, with the existing retail hierarchy set out in Policy R3 of the adopted local plan. These centres all have different histories and serve slightly different roles and catchments, meaning the effect of market trends on each varies. The current health of each centre has been considered and we have concluded that the centres are generally healthy but some are facing challenges as their role evolves.
- xv. **Coventry City Centre** is generally a vital and viable centre, serving shoppers from across the City and beyond, particularly for comparison shopping. However, it is demonstrating clear signs of weakness, including a declining comparison offer and high and increasing vacancy rates.
- xvi. The centre however does have a strong leisure service-orientated function, including a reasonably strong F&B offer. This provides a good basis for a diversified city centre offer which, together with the delivery of planned new developments and improvements, will help to ensure the City Centre's continued health and role at the top of the City's retail hierarchy. Key to this will be identifying and implementing an appropriate policy response to addressing the issue of rising vacancies.
- xvii. **Arena Park Major District Centre** is a strong, modern purpose-built shopping centre anchored by a large Tesco Extra superstore and providing large footprint retail units for a number of major comparison retailers (i.e. Decathlon, M&S and Next). Footfall data shows the centre attracts high and increasing visitor numbers and the centre is healthy, vital and viable.
- xviii. However, the centre needs a broader range of retail and leisure services – including F&B options – to improve its role and function as a Major District Centre serving the north of the City, whilst not competing with the City Centre offer.
- xix. **Brandon Road Major District Centre** appears to be a healthy centre with strong retail attractions, rising levels of footfall and few vacant outlets at present. The centre has a strong shopping function but needs a broader range of retail and leisure services – including F&B options – to improve its role and function as a Major District Centre serving the east of the City, whilst not competing with the City Centre offer.
- xx. **Cannon Park Major District Centre** appears to be a healthy centre. It has a very low vacancy rate, a strong line-up of foodstores (namely Tesco, Aldi and Iceland) and a selection of value-orientated comparison retailers and retail services, notwithstanding the recent Wilko store closure.

- xxi. That said, footfall data suggests that pedestrian activity has not recovered to pre-pandemic levels despite the Vita Student development and proximity to Warwick University, which are likely to be key footfall drivers during term times.
- xxii. The centre needs a broader range of retail and leisure services – including F&B options – to improve its role and function as a Major District Centre serving the south of the City, whilst not competing with the City Centre offer.
- xxiii. In terms of the district centres:
- **Ball Hill** shows signs of being a vital and viable centre given its low vacancy rate and strong convenience and services orientated offer, which appears relevant to the day-to-day needs of local residents. Notwithstanding this, footfall data indicates that pedestrian activity has not returned to pre-pandemic levels, while the centre is faced with environmental quality issues including traffic flows / congestion along Walsgrave Road and the general appearance of the centre.
 - **Bell Green** appears to be a vital and viable centre overall within the limitations of its convenience-based function and localised catchment. Its strengths include a reasonable convenience shopping offer, a declining vacancy rate, and relatively strong levels of pedestrian footfall. However, the centre is lacking Financial & Business Services and diversity in its F&B / evening economy offer and has experienced the closure of Aldi. The centre is also faced with environmental quality issues at Riley Square, and planned investment has still to come forward.
 - **Brade Drive** is the City's smallest District Centre with just 7 outlets. It is anchored by a large Asda store which provides a main food shopping function in addition to a limited non-food shopping and services offer. The store helps to sustain the centre's small-scale retail services. There is also a Buzz Bingo. Despite being a vital and viable centre within the limitations of its overall offer, footfall data shows that pedestrian activity within the centre remains well short of pre-pandemic levels. Brade Drive needs a broader range of services – including F&B options – to ensure its future health and improve its role and function as a District Centre.
 - **Daventry Road** appears to be a healthy, vital and viable centre. It includes a modern Asda store together with a good range of small shops and services which cater for the day-to-day needs of local residents. It also has a popular financial services offer. A relatively high proportion of the centre's outlets (44%) are occupied by national multiples, and footfall levels in the centre are higher than pre-pandemic. The centre's vacancy rate has risen since 2013 but remains broadly in line with the UK average. The centre would benefit from an expanded leisure offer, including evening / night time economy uses, to extend the hours of activity and improve its role and function as a District Centre.
 - **Earlsdon** is an attractive, traditional linear centre within a designated Conservation Area. It includes a mix of national multiples and independent businesses and the centre's vacancy rate is below the UK average. The centre therefore appears healthy and offers a balanced mix of uses to serve its localised catchment, catering well in terms of top-up food shopping and service and community facilities. Earlsdon also has a strong F&B offer including cafes, restaurants and pubs and a theatre on the edge of the centre. However, footfall remains below pre-pandemic levels and the centre has seen a decline in its retail offer. Environmental improvements including safe crossing points along Earlsdon Street may assist in ensuring the centre maintains a vibrant daytime economy to complement the evening offer.

- **Foleshill** is one of the City's largest district centres and provides a good range of independent and specialist retail and service uses. Pedestrian footfall throughout the centre continues to be strong and vacancies are slightly below the UK average. Overall, the centre appears to be a reasonably vital and viable centre within the limitations of its convenience-based function and localised catchment. However, the centre lacks diversity in its F&B / evening economy offer and is also faced with challenges in relation to traffic, car parking and environmental quality issues. More should be done to promote and enhance Foleshill's specialist and ethnic shopping offer, in order to make it more distinguishable from competing provision and more attractive to customers (including the many local residents who 'never' visit the District Centre according to the household survey).
- **Jardine Crescent** is a small and compact centre comprising 21 outlets – only one of which is currently vacant. Within the limitations of its small scale, the centre provides a good range of retail and service uses (4 comparison retail, 5 convenience retail and 11 services) to meet the day-to-day needs of local residents and includes a relatively high number of national multiples. This is supported by the footfall data, which shows the centre is attracting higher levels of footfall than pre-pandemic. Jardine Crescent is therefore a healthy, vital and viable centre overall. However, it lacks a foodstore for main food shopping trips and has experienced the recent closure of its Boots pharmacy. The centre would also benefit from a more diverse F&B offer.
- **Jubilee Crescent** is a healthy, vital and viable centre. It continues to have a very low vacancy rate (currently just one vacant outlet) and very strong levels of pedestrian footfall since the pandemic, which underlines the centre's resilience and relevance to its catchment. To that end, the District Centre (specifically the Asda store) caters for the main food shopping needs of local residents and the centre also includes a mix of retail and service uses, with good representation from national multiples. This is all provided in an attractive setting centred around a large green space, providing the centre with a unique appeal. However, the centre's F&B offer lacks diversity and choice. The introduction of a more varied offer would improve customer choice and potentially expand the evening offer.

CAPACITY ASSESSMENT

- xxiv. Looking forward, the capacity assessment undertaken by LSH, shows that limited growth in retail expenditure and growing online sales reduces the need for additional retail provision in the City during the period to 2033 and there is no requirement to allocate new sites for retail development during this period.
- xxv. The projections for convenience goods suggest that 3,733 sqm net of additional convenience floorspace would be required by 2033, although more than half of this would be outside of the main centres if market shares remain as now.

TABLE B5.12: SUMMARY TABLE - CONVENIENCE GOODS CAPACITY ASSESSMENT (NET SQ M)

	2028	2033	2038	2041
Coventry City Centre	84	156	211	236
Major District Centre - Arena Park	174	322	446	505
Major District Centre - Brando Road	114	208	286	324
Major District Centre - Cannon Park	178	330	443	494
District Centres	243	480	671	760
Local Centres	-18	183	342	416
Elsewhere in Coventry	1,118	2,054	2,795	3,140
Total Convenience Goods Floorspace	1,894	3,733	5,195	5,876

Note: Assumes Equilibrium at Base Year (2023) and Constant Market Shares

- xxvi. In terms of comparison provision the amount of additional floorspace required is 8,412 sqm, with the main requirements being in the City Centre and outside the defined centres, based on current market shares.

TABLE B8.12: SUMMARY TABLE - COMPARISON GOODS CAPACITY ASSESSMENT (NET SQ M)

	2028	2033	2038	2041
Coventry City Centre	1,113	2,872	4,198	4,895
Major District Centre - Arena Park	432	1,000	1,441	1,675
Major District Centre - Brandon Road	87	225	337	401
Major District Centre - Cannon Park	86	203	287	330
District Centres	141	371	546	638
Local Centres	-135	2	103	154
Elsewhere in Coventry	1,609	3,738	5,342	6,185
Total Comparison Goods Floorspace	3,333	8,412	12,253	14,279

Note: Assumes Equilibrium at Base Year (2023) and Constant Market Shares

- xxvii. However, this assessment is based on market shares at the time of the household survey and therefore makes no allowance for existing retail floorspace that was unoccupied at that time.
- xxviii. As has been shown in the health checks, there is a considerable amount of vacant floorspace currently available within Coventry, particularly within the City Centre where there is over 50,000 sqm of vacant space. Whilst it is accepted that not all of this will be suitable for current retailer requirements, this is more than ten times the amount of space required for additional comparison provision up to 2038.
- xxix. There are also existing allocations for new retail floorspace at Eastern Green Major District Centre, the qualitative need for local centre provision at Keresley North and South remains.

POLICY RECOMMENDATIONS

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

Existing Local Plan Policy	Proposed Changes																								
<p>Policy R1 Delivering Retail Growth</p> <p>1. The following sites/areas are allocated to support the provision of retail floor space across Coventry. These schemes are to be delivered in accordance with the specifications in this policy and other policies within this plan and the City Centre AAP as appropriate.</p> <table border="1" data-bbox="263 633 949 1189"> <thead> <tr> <th>Site</th> <th>Proposed floor space (sq.m gross)</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>City centre</td> <td>At least 70,100</td> <td>A1-A5 uses of varying size (including bulky goods retail where appropriate) to be delivered through the Area Action Plan at City Centre South, City Centre North, Friargate, City Centre Supermarket and wider support for the creation of active frontages within the wider city centre. Also includes allowance for city centre vacant units.</td> </tr> <tr> <td>New Eastern Green Major District Centre</td> <td>Up to 10,000</td> <td>To include approx. 5,000sq.m for a new superstore, 4,000sq.m of predominantly bulky goods retail and up to 1,000sq.m of small scale local provisions.</td> </tr> <tr> <td>Cannon Park Major District Centre*</td> <td>6,200</td> <td>New A1 elements of the scheme should be restricted to convenience and bulky goods retail. Non A1 uses will be supported to encourage diversification of the centre, especially around A2-A5 uses.</td> </tr> <tr> <td>New Keresley Local Centre south</td> <td>1,500</td> <td>Local centre to include a range of small scale units providing a range of local community uses and top up provisions.</td> </tr> <tr> <td>New Keresley Local Centre north</td> <td>1,000</td> <td>Local centre to include a range of small scale units providing a range of community uses and top up provisions.</td> </tr> <tr> <td>Brade Drive District Centre</td> <td>1,000</td> <td>New retail floor space should be focused around new A1-A5 uses and other non-retail uses. This should be delivered in small scale units to support local needs and help diversify the centre's current offer.</td> </tr> <tr> <td>Jardine Crescent District Centre</td> <td>500</td> <td>New floor space to be provided as part of mixed use schemes within amended centre boundary. A1-A5 uses to be provided, which reflect the existing character of the centre.</td> </tr> </tbody> </table>	Site	Proposed floor space (sq.m gross)	Details	City centre	At least 70,100	A1-A5 uses of varying size (including bulky goods retail where appropriate) to be delivered through the Area Action Plan at City Centre South, City Centre North, Friargate, City Centre Supermarket and wider support for the creation of active frontages within the wider city centre. Also includes allowance for city centre vacant units.	New Eastern Green Major District Centre	Up to 10,000	To include approx. 5,000sq.m for a new superstore, 4,000sq.m of predominantly bulky goods retail and up to 1,000sq.m of small scale local provisions.	Cannon Park Major District Centre*	6,200	New A1 elements of the scheme should be restricted to convenience and bulky goods retail. Non A1 uses will be supported to encourage diversification of the centre, especially around A2-A5 uses.	New Keresley Local Centre south	1,500	Local centre to include a range of small scale units providing a range of local community uses and top up provisions.	New Keresley Local Centre north	1,000	Local centre to include a range of small scale units providing a range of community uses and top up provisions.	Brade Drive District Centre	1,000	New retail floor space should be focused around new A1-A5 uses and other non-retail uses. This should be delivered in small scale units to support local needs and help diversify the centre's current offer.	Jardine Crescent District Centre	500	New floor space to be provided as part of mixed use schemes within amended centre boundary. A1-A5 uses to be provided, which reflect the existing character of the centre.	<p>The City Centre allocations are no longer required to meet any quantitative need for convenience or comparison floorspace. However, qualitative needs are likely to remain particularly in the context of regeneration proposals.</p> <p>The Eastern Green allocation should be updated to allow more flexibility in the end uses, to include appropriate provision of retail and leisure uses.</p> <p>There is no quantitative requirement for further retail development at Cannon Park, Brade Drive DC or Jardine Crescent DC. These allocations are therefore no longer required.</p> <p>Allocations at the new Local Centres at Keresley North and Keresley South could be updated to remove the floorspace amount or express it as a maximum. Some guidance on the size of units should also be included.</p>
Site	Proposed floor space (sq.m gross)	Details																							
City centre	At least 70,100	A1-A5 uses of varying size (including bulky goods retail where appropriate) to be delivered through the Area Action Plan at City Centre South, City Centre North, Friargate, City Centre Supermarket and wider support for the creation of active frontages within the wider city centre. Also includes allowance for city centre vacant units.																							
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Jardine Crescent District Centre	500	New floor space to be provided as part of mixed use schemes within amended centre boundary. A1-A5 uses to be provided, which reflect the existing character of the centre.																							
<p>2. The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area.</p>	<p>No change</p>																								
<p>3. Further retail provision at Arena Park Major District Centre will not be supported during the plan period unless it is demonstrated that it will not have a significant adverse impact on the city centre or is an essential element of supporting the wider parks tourism functions.</p>	<p>The reference to 'retail' should be expanded to include leisure and other town centre uses.</p> <p>Consideration should be given to extending the reference to Arena Park MDC to also include Brandon Road MDC.</p>																								
<p>Policy R2: Coventry City Centre – Development Strategy</p> <p>1. The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre,</p>	<p>No change to Part 1.</p> <p>Part 2 to be removed/updated as appropriate.</p>																								

<p>leading in design, sustainability and culture. This will be achieved by:</p> <ul style="list-style-type: none"> a. Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play; b. Enhancement of its retail and leisure offer to strengthen the city's sub-regional role; c. Provision of high quality office space; d. Becoming a hub for education; e. Including a variety of places to live which cater for different needs; f. Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment; g. A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes; h. Accessible for all; i. Providing an attractive and safe environment for pedestrians, cyclists and motorists; j. Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure; k. High quality sustainable built design; l. Continuing to develop a vibrant and attractive night time economy; m. Providing opportunities to improve health and wellbeing; n. Continuing to support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan; o. Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch; p. Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible. <p>2. An Area Action Plan will be developed to help deliver this strategy and support and guide development within the city centre.</p>	
<p>Policy R3: The Network of Centres</p>	<p>No change.</p>

<p>1. To support the city centre, the Council will designate, enhance, maintain and protect a network of Centres consisting of Major District Centres, District Centres and Local Centres. These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment.</p>	
<p>2. In all these Centres:</p> <p>a. A balance will be sought between shops (Class A1), and other Main Town Centre and community uses in order to protect the vitality and viability of the centre as a whole;</p> <p>b. Proposals that reduce the concentration of A-class uses within a centre below 51% will not be approved;</p> <p>c. A residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment and so long as it does not undermine the functionality of the centre;</p> <p>d. Improvement to the environment and accessibility will be promoted and encouraged.</p>	<p>Reference to Class A1 at (a) should be removed.</p> <p>Part (b) should be removed or updated to refer to Class E with a new threshold value.</p> <p>No change to (c) or (d).</p>
<p>3. Major District Centres are shown on the Policies Map at:</p> <p>a. Arena Park;</p> <p>b. Cannon Park;</p> <p>c. Brandon Road;</p> <p>d. Eastern Green.</p> <p>They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city for:</p> <p>e. a mix of bulk convenience and comparison shopping as well as service and catering uses;</p> <p>f. social, community and leisure uses including hotels;</p> <p>g. offices.</p>	<p>Final part of the policy referencing the types of development that can be accommodated within the MDCs should be removed to allow flexibility of uses which support the needs of their part of the city.</p>
<p>4. District Centres are shown on the Policies Map at:</p> <p>a. Ball Hill;</p> <p>b. Bell Green;</p> <p>c. Brade Drive;</p> <p>d. Daventry Road;</p> <p>e. Earlsdon;</p>	<p>No change.</p>

<p>f. Foleshill;</p> <p>g. Jardine Crescent;</p> <p>h. Jubilee Crescent.</p> <p>They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social, community, leisure and small scale office uses will also be acceptable.</p>	
<p>5. Local Centres are shown on the Policies Map at:</p> <p>a. Acorn Street;</p> <p>b. Ansty Road;</p> <p>c. Baginton Road;</p> <p>d. Bannerbrook;</p> <p>e. Barkers Butts Lane;</p> <p>f. Binley Road;</p> <p>g. Birmingham Road;</p> <p>h. Broad Park Road;</p> <p>i. Charter Avenue;</p> <p>j. Far Gosford Street;</p> <p>k. Green Lane;</p> <p>l. Hillfields;</p> <p>m. Holbrook Lane;</p> <p>n. Holyhead Road;</p> <p>o. Keresley North;</p> <p>p. Keresley Road;</p> <p>q. Keresley South;</p> <p>r. Longford;</p> <p>s. Quorn Way;</p> <p>t. Radford Road;</p> <p>u. Station Avenue;</p> <p>v. Sutton Avenue;</p> <p>w. Walsgrave Road;</p> <p>x. Willenhall;</p>	<p>No change.</p>

<p>y. Winsford Avenue.</p> <p>They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable.</p>	
<p>Policy R4: Out of Centre Proposals</p> <p>1. Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of existing uses and the variation of existing conditions) will not be permitted in out-of-centre locations unless they satisfy the Sequential Assessment and the Impact Test (where appropriate).</p>	<p>No change</p>
<p>2. Sequential Assessment</p> <p>a. A Sequential Assessment will be required for all retail and other Main Town Centre use proposals outside a defined centre and should be prepared in accordance with national guidance. This should have regard to the centres hierarchy set out in policy R3.</p> <p>b. Where in-centre options are exhausted, edge of centre locations (within 300m of a centre boundary) that are well connected and accessible to the centres themselves should also be considered in advance of out of centre sites.</p>	<p>Paragraph 2 needs updating to refer to the NPPF definitions which are 300m from the PSA for retail proposals and 300m from the town centre boundary for other town centre uses.</p>
<p>3. Impact Test</p> <p>a. An Impact Test will be required for all retail and other Main Town Centre use proposals outside a defined centre that exceed 1,000sq.m (gross) floor space. The Assessment of Impact should be prepared in accordance with national guidance and consider the potential impact on the vitality, viability, role and character of a defined centre(s) within the centres hierarchy (as set out in policy R3).</p> <p>b. Catchment areas for Sequential Assessments and Impact Tests will be considered on a case by case basis to reflect the specific proposals being considered.</p>	<p>Paragraph 3(a) needs updating to refer to the new thresholds proposed.</p> <p>Paragraph 3(b) could be reworded to refer to the appropriate centres to be considered when undertaking the sequential and impact tests will be considered on a case by case basis....</p>
<p>Policy R5: Retail Frontages and Ground Floor Units in defined centres</p> <p>1. Proposals to use ground floor units within defined centres for non-A class uses will normally be permitted provided that:</p>	<p>Reference to Class A needs updating to refer to Class E.</p>

<p>a. the primary retail function of the centre would not be undermined in the context of Policy R3;</p> <p>b. the use would make a positive contribution to the overall role, vitality and viability of the centre;</p> <p>c. the use is compatible with other Plan policies.</p>	
<p>2. The impact of a proposal on the primary retail function of a centre will be determined on the basis of:</p> <p>a. the location and prominence of the unit within the relevant frontage;</p> <p>b. the width of the frontage of the unit when compared to other units in the centre;</p> <p>c. the number and proximity of other units occupied by 'A' class uses;</p> <p>d. compatibility of the proposal with nearby uses.</p>	<p>Reference to Class A needs updating to refer to Class E.</p>
<p>Policy R6 Restaurants, Bars and Hot Food Takeaways</p> <p>1. Outlets should be located within defined centres and will normally be discouraged outside those locations.</p> <p>2. Proposals within defined centres will be permitted provided they:</p> <p>a. would not result in significant harm to the amenity of nearby residents or highway safety;</p> <p>b. would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet;</p> <p>c. are in accordance with the emerging Hot Food Takeaway Supplementary Planning Document (in particular, proposals for A5 uses); and</p> <p>d. are compatible with other Plan Policies.</p>	<p>Reference to restaurants needs to be removed.</p> <p>Paragraph 1(c) needs to be updated to remove the reference to A5 uses and reference the adopted SPD.</p>
<p>Policies Map</p>	<p>Policies map needs to be updated to reflect introduction of PSAs for all Major and District Centres.</p> <p>Town centre boundaries need to be updated to reflect proposed changes.</p>
<p>New Policy – Local Parades/Stores</p>	<p>Suggest a new policy is included to support and protect local shopping parades and stores.</p>

New Policy – Markets

Suggest a new policy is included to support and protect markets.

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 over 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 has been undertaken in two stages:
- **Stage 1: Issues & Options Topic Paper** was published in April 2023 and provides 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 (this report)** – follows on from the findings of Stage 1 and provides a new comprehensive evidence base to inform the emerging local plan. It includes:
 - a quantitative assessment of the need for new town centre uses across Coventry's centres, with particular focus on retail uses;
 - a qualitative assessment of the need for new retail and leisure uses, informed by the findings of the new household survey and trend and market data;
 - health checks of the city centre and Coventry's 12 district centres, building on the information previously provided in the Stage 1 report;
 - a review of the local centres in the city; and
 - a review of current planning policy relating to retail and town centre uses and recommendations on what changes may need to be considered as part of the Local Plan review that is currently being undertaken.
- 1.4 This Stage 2 Assessment is structured as follows:
- **Section 2** provides an update to the Stage 1 advice regarding retail market trends;
 - **Section 3** provides a review of commercial leisure and other market trends affecting town centres;
 - **Section 4** provides a review of the retail hierarchy in Coventry and centre health checks for the City Centre, Major District Centres and District Centres;
 - **Section 5** sets out the retail and leisure capacity assessments findings and advice on qualitative need; and
 - **Section 6** provides our advice on town centre policy changes and other matters that the Council may wish to consider when reviewing their Local Plan
- 1.5 It should be noted that this report includes some of the information previously provided in the Stage 1 report or references to it, where relevant (for instance as part of the health checks). However, it does not otherwise repeat the information provided previously.

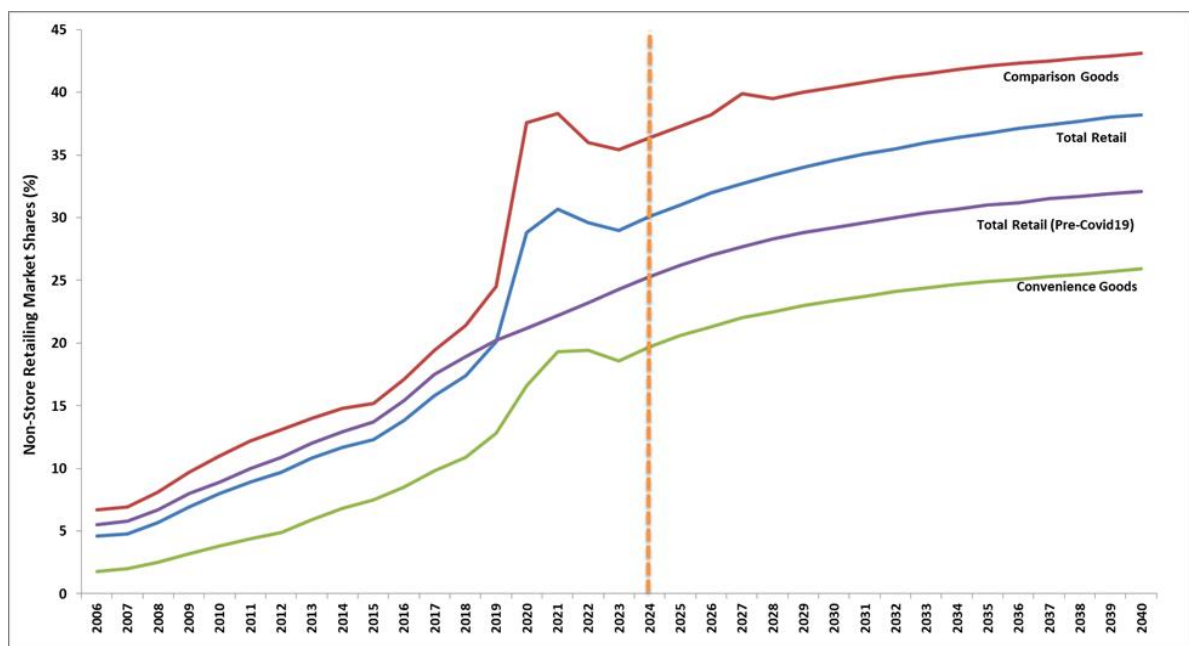
2. REVIEW OF STAGE 1 MARKET TRENDS OVERVIEW

- 2.1 This section provides an update to the Stage 1 report, reflecting the very latest information available on the key economic, consumer and property market trends that will shape the retail sector in the future.
- 2.2 Although only 6 months has elapsed since the Stage 1 Topic Paper was prepared, the intervening period has continued to see major changes in the economy, interest rates and town centre businesses as was expected in the original report (paragraph 3.1). This section therefore provides an update on Section 3 of the Stage 1 report.

ONLINE RETAILING

- 2.3 The Stage 1 report highlighted how the pandemic had accelerated the market share of online / non store retailing. The latest information from Experian confirms that this trend is continuing, with the proportion of total non-store sales in the UK expected to increase over time at a faster rate than previously predicted as a result of higher comparison purchases. The use of non store sources for convenience sales is expected to increase slightly more slowly than previously anticipated but will be similar by 2040¹.

Figure 2.1: Non-Store Retail Sales – Changes in UK Market Shares (2006 – 2040)



Source: Source: Experian Retail Planner Briefing Note 20 (February 2023) and Experian Retail Planner Briefing Note 17 (February 2020)

¹ The last year for which Experian currently provide a forecast

Table 2.1: Comparison of Non Store Retail Sales (UK) - Experian Briefing Notes 19 (January 2022) and 20 (February 2023)

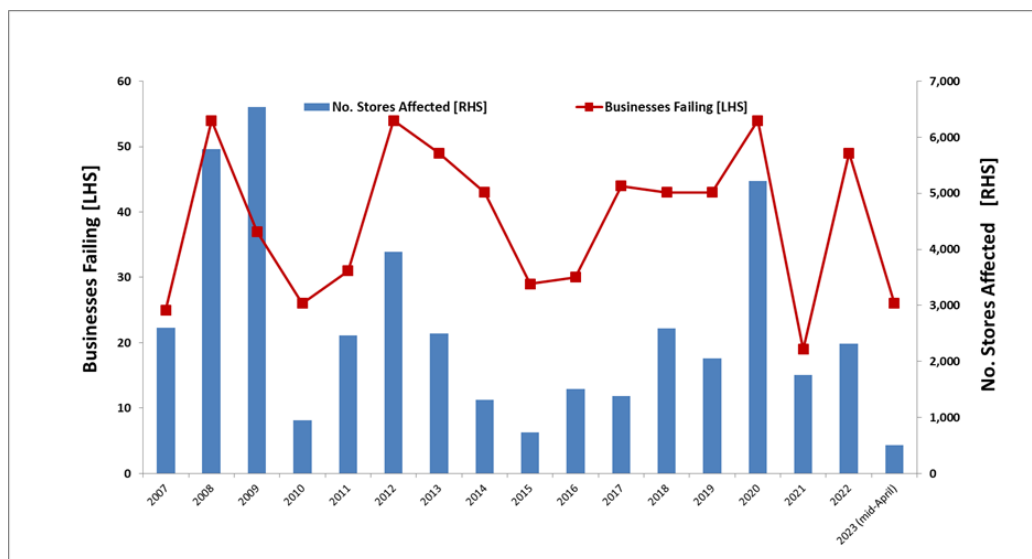
	Expected % Non Store Sales (adjusted for sales from stores)		
	All Retail	Comparison	Convenience
2023 Experian RPBN 19	18.2%	24.7%	6.0%
2023 Experian RPBN 20	18.6%	26.5%	5.6%
2028 Experian RPBN 19	21.1%	27.6%	6.9%
2028 Experian RPBN 20	21.5%	29.6%	6.8%
2033 Experian RPBN 19	22.8%	29.1%	7.3%
2033 Experian RPBN 20	23.4%	31.1%	7.3%
2038 Experian RPBN 19	24.1%	29.9%	7.6%
2038 Experian RPBN 20	24.9%	32.0%	7.7%
2040 Experian RPBN 19	24.5%	30.1%	7.7%
2040 Experian RPBN 20	25.4%	32.3%	7.8%

Source: Experian Retail Planner Briefing Notes 19 and 20 – Figure 5

BUSINESS FAILURES & VACANCIES

- 2.4 Business failures have continued to occur during 2023, although it is too soon to know if the year will be similar to 2022 or not.

Figure 3.2 Major Retail Failures in the UK (2007 – 2023 (mid-April))



Source: Centre for Retail Research (January 2023)

- 2.5 However, it is clear that national retailers with extensive high street store portfolios are continuing to struggle to maintain market shares in the increasingly competitive environment. The higher costs of

trading from high streets, compared with online and out-of-centre retailing, means it is not a “*level playing field*”. These underlying costs (including rents, business rates, service charges, utility bills, staff costs, etc) are outpacing sales growth for many retailers, eroding profitability, and resulting in more store closures.

- 2.6 The resultant increase in vacancy rates from business failures over the last 5-10 years further illustrates the challenges that the retail and leisure sectors are facing. According to the Local Data Company (LDC)², the GB average vacancy rate for all retail and leisure increased from 12.1% in 2019 (H2) to a peak of 14.5% in 2021 (H1), although vacancies have since fallen back slightly to 13.8% in 2022 (H2). Of this total:
- The average **leisure vacancy rate** in 2022 (H2) stood at 10.5%, down from a peak of 11.3% in 2021 (H1).
 - The average **retail vacancy rate** was 15.3% in 2022 (H2), down from a peak of 15.8% in 2021 (H1).
- 2.7 In the retail property sector, shopping centres had the highest recorded average vacancy rate of 18.2% in 2022 (H2), compared with traditional high streets (13.8%) and retail parks (9%).
- 2.8 The strong performance of retail parks reflects the fact that they remain relatively desirable destinations for shoppers and operators due to their convenience, ease of access, free and extensive parking, larger format stores, and their competitive rental values compared to shopping centres and high streets. Retail parks are therefore still an attractive proposition for those retailers 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. As a result, retailers who previously anchored the vitality and viability of town centres, are now competing directly in some locations with high streets for shoppers, spend and sales.
- 2.9 In contrast, shopping centres have generally experienced the largest increases in long-term vacant space over recent years. As LSH’s recent research explains³, this has resulted in significant activity in the shopping centre market, as owners (both public and private sector landlords) explore opportunities to acquire, repurpose and redevelop failing centres. The repurposing of large volumes of shopping centre space is increasingly a key part of regeneration activity across the UK. Shopping centres need to be transformed into mixed-use locations with a wide range of commercial, residential and community space. This will enable centres to forge new roles as living, working places at the heart of communities.
- 2.10 Research confirms that many centres and shopping locations across the UK simply have too much retail floorspace stock, and/or they have the wrong type of retail floorspace that does not meet the needs of modern national retailers for larger format shop units. Some analysts have reported that there may be as much as 30% too much physical space in the retail sector. LSH’s recent joint research with REVO⁴ and other partners also highlighted that almost two-thirds of town centre stakeholders believe that between 20%-40% of retail space in town centres should be repurposed or redeveloped⁵. The LSH/Revo research also confirms that the oversupply of retail floorspace has overtaken business rates as the main challenge for the recovery and renaissance of our town centres.

² Local Data Company (LDC) (2023) *FY 2022 Retail and Leisure Trends Analysis*.

³ LSH (2022) *Shopping Centre Futures: Putting shopping centres at the heart of regeneration*

⁵ LSH / REVO (2023) *From Recovery to Renaissance: What is the future for our towns, high streets and shopping centres*.

RETAIL SPENDING

- 2.11 Since the Stage 1 Report was issued, Experian has produced an updated Retail Planner Briefing Note No. 20 (February 2023), which reflects the uncertainty currently being seen in the economy. As a result:
- **Convenience goods:** the decline in convenience spend per head was slightly better in 2021 than previously expected (-1.4% rather than the forecast -3.7%) but Experian now expect a greater decline in 2022 (-6.7%) and continuing into 2023 (-2.3%) and 2024 (0.4%). After that growth is expected to be minimal at +0.1% per annum to 2029 increasing to +0.2% from 2030 onwards. This remains an improvement on the historic long term trend (1997-2021) of -1.4% per annum.
 - **Comparison goods:** the impact of recent economic uncertainties is now being seen in Experian's forecasts, with declines in comparison expenditure per head now expected in 2022 and 2023 (-0.4% and -1.6% respectively). After limited growth in 2023 (+0.3%) relatively strong growth is expected to 2029 (+2.5% per annum) and +3.0% per annum from 2030 onwards. This compares with an average +2.3% from 2012 to 2021.
 - **Leisure spend:** following a dramatic -37.9% fall in leisure spend per head in 2020, Experian now estimate a higher "bounce" back to growth in 2021 (+30.5%) and 2022 (+27.7%). Cost of living limitations is then expected to reduce expenditure in 2023 (-5-0%) and 2024 (-0.2%) before growth of 1.0% per annum to 2029 and 0.9% afterwards. This compares with an average decline of -2.4% per annum between 1997 and 2021.
- 2.12 These new growth rates are reflected in the quantitative need assessment provided in this report, but the overall picture is of one of limited increases in spend during the plan period and especially in the 10 years to 2033.

CONCLUSIONS ON RECENT RETAIL MARKET TRENDS

- 2.13 The Stage 1 report highlighted how the pandemic had accelerated the growth in market share of online / non store retailing and the latest information from Experian confirms that this trend is continuing. At the same time economic uncertainty and the rising cost of living is leading to reduced expenditure overall. As a result, the retail sector continues to face major challenges.
- 2.14 Vacancy rates in town centres are therefore likely to remain relatively high and the need to widen the range of town centre uses to counter the structural changes in the retail sector remains important.

EXPERIENCE IN COVENTRY

- 2.15 The retail centres within Coventry will have faced the same challenges as those in the rest of the UK, with differing effects given the unique offer and catchment each serves.
- 2.16 The failure of key national multiple retailers and the rationalisation of their store portfolio by others, would be expected to impact the higher order centres most, and this has been seen in Coventry City Centre including the closure of the likes of Ikea and more recently Wilko. This will have contributed to the decline in comparison retail in the City Centre but also provides opportunities for diversification.
- 2.17 The Major District Centres and District Centres will also have been vulnerable to the loss of national multiples, with Cannon Park MDC seeing the closure of Wilko and Arena Park MDC New Look as examples. However, these centres generally have a greater reliance on convenience provision and this sector has seen continued retailer investment in new stores. The stronger independent offer in lower order centres will also reduce the impact of such losses.

3. COMMERCIAL LEISURE AND OTHER LAND USE TRENDS AND OPPORTUNITIES

3.1 Having considered how retail and shopping in town centres has changed in recent years in the previous section, it is also important to consider how changing trends within the commercial leisure sector may affect the demand for new leisure uses and facilities in Coventry over the plan period, as vital and viable town centres can only be achieved by providing a wide mix of uses.

3.2 This assessment focuses on the main leisure, entertainment and cultural uses identified as town centre uses in the NPPF (Annex 2), namely:

“...leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); ... and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).”
(NPPF, Annex 2)

3.3 The starting point for this assessment is a consideration of the relative importance of various types of activity in terms of likely spend and expected growth. We then consider the key town centre uses in more depth.

LEISURE EXPENDITURE

3.4 Expenditure on leisure items and activities is an important element of a household budget and it is estimated that in 2021, UK households spent in excess of £158 billion on such items including:

- **Recreational and sporting services** - ie services provided by sports stadia, racecourses, rinks, golf courses, pools, courts, bowling alleys, gyms, fairs, parks, dancing and skating;
- **Cultural services** – ie cinemas, theatres, concerts, circuses, TV rental, satellite subscription, video hire, hire of musicians, clowns, performers, photographers, film processing;
- **Restaurants, cafes etc (F&B)** – ie catering services, meals, alcohol, snacks and drinks sold by restaurants, pubs, cafes etc;
- **Accommodation services** – ie accommodation in hotels, motels, inns, “bed and breakfast” establishments, caravan sites, youth hostels, boarding schools, universities and other educational establishment accommodation; and
- **Hairdressing salons & personal grooming** – ie hairdressers, barbers, beauty shops and salons, men’s personal grooming centres, massage parlours, saunas, tanning centres.

3.5 Not all this expenditure will relate to town centre activities, nor could a town centre be expected to accommodate all leisure outlets. It is also the case that much of the spend on accommodation will be spent outside of a resident’s home area. However, a review of expenditure by Coventry residents shows the relative importance of key town centre uses:

TABLE 3.1: LEISURE EXPENDITURE PER CAPITA 2021 (INCLUDING ONLINE SPEND)

		Expenditure per head (£ pa)						Total per capita leisure spend 2021 (£)	Total per capita leisure spend 2023 (£)
		Restaurants /cafes etc	Cultural Services	Accommodation services	Recreational & Sporting	Games of Chance	Personal grooming		
Zone 1	Coventry South East	£1,288	£298	£163	£107	£174	£68	£2,098	£2,545
Zone 2	Coventry North West	£1,067	£259	£136	£91	£161	£59	£1,773	£2,151
Zone 3	Coventry North East	£1,027	£255	£126	£90	£166	£57	£1,721	£2,088
Zone 4	Coventry South West	£1,330	£311	£186	£114	£182	£71	£2,194	£2,662
Zone 5	Outer Zone West	£1,398	£422	£255	£172	£262	£94	£2,603	£3,158
Zone 6	Outer Zone North	£1,190	£314	£168	£119	£208	£78	£2,077	£2,520
Zone 7	Outer Zone East	£1,331	£376	£210	£143	£220	£86	£2,366	£2,870
Zone 8	Outer Zone South	£1,574	£440	£284	£188	£282	£106	£2,874	£3,487
Coventry		£1,192	£284	£155	£102	£171	£64	£1,968	£2,387

Source: Average spend per capita estimates (2021 prices) are derived from Experian MMG3 'Retail Area Planner' Reports.

3.6 Going forward, leisure spend overall is expected to increase by around 2.7% per annum between 2022 and 2031 and 0.8% per annum to 2040⁶, which equates to an average of 1.8% per annum across the whole period. This represents a significant increase over time, with the period 1997 to 2021 having experienced a decline of -2.4% per annum. However, expenditure for different types of leisure will experience different rates of growth during this period, with varying degrees of spend being made online.

3.7 When translated into the spend available in the study area and the expected increase over time (Table 3.2), the potential importance of leisure is evident. In 2023 leisure spend in Coventry exceeds £750m and this is expected to rise by £143m by 2033, representing an increase of over 17%.

TABLE 3.2: TOTAL AVAILABLE LEISURE EXPENDITURE - 2023 to 2038 (£m)

		2023	2028	2033	2038	2041	Growth 2023-2033		Growth 2023-2038	
Zone 1	Coventry South East	£245.4	£267.5	£291.9	£315.4	£329.4	£46.5	18.9%	£70.0	28.5%
Zone 2	Coventry North West	£187.0	£204.0	£223.0	£241.6	£252.7	£36.0	19.2%	£54.6	29.2%
Zone 3	Coventry North East	£195.1	£213.1	£232.1	£251.2	£262.8	£37.0	19.0%	£56.1	28.8%
Zone 4	Coventry South West	£219.7	£238.8	£259.7	£280.1	£292.4	£40.1	18.2%	£60.4	27.5%
Zone 5	Outer Zone West	£87.6	£93.9	£101.0	£108.1	£112.4	£13.4	15.3%	£20.5	23.4%
Zone 6	Outer Zone North	£244.5	£260.4	£279.1	£299.0	£311.7	£34.7	14.2%	£54.5	22.3%
Zone 7	Outer Zone East	£130.7	£140.5	£151.5	£163.4	£171.1	£20.9	16.0%	£32.8	25.1%
Zone 8	Outer Zone South	£119.4	£127.3	£137.2	£146.7	£152.4	£17.8	14.9%	£27.3	22.9%
Coventry		£753.0	£821.2	£896.0	£969.2	£1,013.1	£143.0	19.0%	£216.2	28.7%
Total Study Area:		£1,429.4	£1,545.4	£1,675.7	£1,805.6	£1,885.0	£246.3	17.2%	£376.2	26.3%

3.8 The majority of this spend will be on F&B (Table 3.3), with an £86.6m increase in expenditure expected within Coventry between 2023 to 2033.

TABLE 3.3: TOTAL AVAILABLE FOOD & BEVERAGE EXPENDITURE - 2023 to 2038 (£m)

		2023	2028	2033	2038	2041	Growth 2023-2033		Growth 2023-2038	
Zone 1	Coventry South East	£150.7	£164.2	£179.2	£193.6	£202.2	£28.5	18.9%	£42.9	28.5%
Zone 2	Coventry North West	£112.5	£122.8	£134.2	£145.4	£152.1	£21.7	19.2%	£32.8	29.2%
Zone 3	Coventry North East	£116.4	£127.1	£138.5	£149.9	£156.8	£22.1	19.0%	£33.5	28.8%
Zone 4	Coventry South West	£133.2	£144.7	£157.5	£169.8	£177.3	£24.3	18.2%	£36.6	27.5%
Zone 5	Outer Zone West	£47.1	£50.4	£54.3	£58.1	£60.4	£7.2	15.3%	£11.0	23.4%
Zone 6	Outer Zone North	£140.1	£149.2	£159.9	£171.3	£178.6	£19.9	14.2%	£31.2	22.3%
Zone 7	Outer Zone East	£73.5	£79.0	£85.2	£91.9	£96.3	£11.7	16.0%	£18.4	25.1%
Zone 8	Outer Zone South	£65.4	£69.7	£75.1	£80.4	£83.5	£9.7	14.9%	£15.0	22.9%
Coventry		£456.1	£497.4	£542.7	£587.0	£613.6	£86.6	19.0%	£131.0	28.7%
Total Study Area:		£838.8	£907.3	£984.0	£1,060.4	£1,107.1	£145.1	17.3%	£221.6	26.4%

3.9 Much of this spend will, or has the potential to be, spent in defined centres at all levels of the retail hierarchy. Cultural spend will be important for Coventry City Centre, although a high proportion is likely to be spent outside the city, whilst hairdressing and personal grooming services may generate less expenditure per head but are more likely to be spent locally.

3.10 However, the appropriate planning policy response varies by the type of use. For example most, if not all hairdressing and personal grooming premises will be considered as Class E uses, and therefore will be subject to the same planning policies as retail uses both within and outside town centres, whilst demand for the development of new cultural and intensive sports uses will be market led and likely to be linked to identified needs in a catchment area that will be defined by industry specific factors.

⁶ Experian Retail Planner Briefing Note 20, Figure 2

- 3.11 This review of sector trends and information on the current position in Coventry therefore concentrates on those uses where planning policies may be most relevant, namely:
- Eating out /Food & Beverage (F&B) uses;
 - Cultural services; and
 - Recreational and sporting services.

EATING AND DRINKING OUT

- 3.12 The food and beverage (F&B) sector includes restaurants, cafés, bars and pubs (former use Classes A3-A5). These uses are an integral part of a town centre's wider offer and economy. A good choice and quality of F&B uses can help to complement other town centre uses, by generating trips, stretching 'dwell times' (i.e. the time people spend in centres), increasing 'linked' expenditure to other shops and businesses as part of the same trip, and strengthening both daytime and evening economies.
- 3.13 As identified above, the F&B sector dominates average household expenditure and participation in leisure. In theory, this expenditure growth should be available to enhance the scale, quality and choice of F&B uses across the City. In reality though, this growth will be determined by current and future trends in the sector and market demand. The table below summarises some of the current trends that are driving changes in the food and beverage sector.

Table 4.2: Key trends in the food and beverage sector

Use:	Headline Market Trends:
Restaurants	<p>Notwithstanding the impacts of the pandemic, this sector had experienced mixed fortunes up to 2020 before the pandemic. Over investment in some casual dining brands led to their collapse before or directly after the pandemic as sales dropped while those carrying debt are vulnerable. The pandemic accelerated the popularity of 'eating at home', with restaurants entering the home delivery market using online third-party delivery companies (such as Just Eat, Deliveroo and Uber Eats). Post Covid, restaurants are now facing further challenges associated with rising operating costs, rising supply costs, staff shortages, and cost of living factors (e.g. potential that customers will cut back on dining out).</p>
Pubs and Wine Bars	<p>Pub operators have widened their food and non-alcoholic beverage offer the last decade, resulting in the growth of so-called "gastro-pubs" and, most recently, the rise in 'micro' and 'craft' pubs. Notwithstanding this trend, the sector has also been characterised by increasing consolidation and closures. This is mainly explained by high occupancy costs (e.g. business rates) and beer duty, and changes in consumer demand and drinking habits. As a consequence, there has been a significant increase in the conversion and/or redevelopment of pubs to alternative uses over the last decade, including for residential uses and/or convenience retailing.</p> <p>Research by CAMRA indicated that some 854 pubs closed in 2018, although this was a reduction on the 980 seen in 2017, which most likely reflected the impact of new planning policies and the recognition of pubs as 'Assets of Community Value' (ACV). However, closures are continuing and 400 pubs closed in England and Wales in 2022. Similar pressures to the restaurant sector will apply, particularly regarding rising operating and supply costs, and more customers drinking at home due to the cost of living crisis. Many pubs are focusing on their dining offer to widen their customer base but still face issues around cost and labour supply.</p> <p>Recent years have also seen a rise in licenced premises also providing an active leisure offer, with activities such as darts, bowling and table tennis all being provided in bar settings. Such activities</p>

	however are likely to require a large catchment population and so are only looking to locate in the higher order centres.
Cafés and Coffee Shops	<p>This sector has experienced strong growth over the last decade. Latest figures show that the UK coffee shop market comprises some 25,500 outlets, of which 9,885 are branded outlets, with 5,723 being focused on coffee and 4,162 focused on food. The branded coffee shop market had a turnover of £4.9bn in 2022, an increase of 11.9% over the previous 12 months but still below pre-pandemic levels⁷.</p> <p>Costa Coffee, Greggs and Starbucks are the three largest chains in the UK, with 6,178 outlets. However, notwithstanding the rise of the multiples, this sector has also been characterised by growth in independent and specialist cafés and coffee houses; particularly those serving a more luxury or specialist offer (e.g. organic, in-house roasted beans, and Fairtrade). In the specialty segment, artisan concepts continue to grow (such as 'Department of Coffee' and 'Social Affairs'). Others include London-based 'Grind' and 'Caravan', which have the potential to expand to regional centres, particularly centres within the London commuter belt. The strong independent coffee sector has also fuelled many new start-up businesses in local centres. The continued growth of this sector has been one of the most successful in the UK economy.</p> <p>However, some rationalisation of company portfolios can be expected where demand may have fallen as a result of increased Working from Home (WfH) / hybrid working. There is also an increasing emphasis on drive-thru operations, which tend to be orientated to out-of-centre locations.</p>

- 3.14 Research shows that the multiple chains mainly dominated the expansion of the F&B sector up to 2017 when they accounted for almost half of all net new business openings. However, since 2017 a number of multiples in the casual dining sector have struggled against a backdrop of increased competition, rising costs and a tightening of consumer spending due to wider Brexit and economic concerns.
- 3.15 The reality is that too many F&B operators expanded too quickly into increasingly marginal locations, funded by private equity, and the market became saturated and unsustainable. The growth in the availability, convenience and speed of home deliveries driven by new technology and apps represents a further significant challenge to more traditional F&B operators. These challenges have been further accelerated by the impact of the COVID-19 pandemic while sharp rises in energy prices and more difficulties in recruiting service workers is now impacting on the viability of many F&B businesses.
- 3.16 These new challenges and pressures have resulted in a radical restructuring of businesses across the sector, resulting in the closure of many loss-making branches. Pre-pandemic the biggest impact to the market was experienced in the 12 months to June 2019 when an estimated 1,412 UK restaurants closed. This represented a 25% increase in restaurant closures compared to the previous year and the highest number of insolvencies recorded since 2014, when approximately 750 restaurants closed. Casualties were primarily felt in the casual dining market which saw many brands exit the market either completely or saw their portfolio shrink considerably (e.g. Strada, Jamie's Italian, Byron Burger, Carluccio's and Prezzo).
- 3.17 However, the impact of the pandemic has created even more difficult trading conditions that have persisted. In April 2021 there were 9.7% fewer restaurants trading in the UK compared to the year before, of which the biggest decline was in the casual dining market where the number of restaurants fell by almost 20%. By the end of 2022, there was a 1,611 net reduction in licensed premises from the year before⁸. A "shakeout" in the sector will leave the proactively managed multiple and independent businesses that have strong brand loyalty and/or a clear differentiated offer as the main "winners".

⁷ Project Cafe UK 2023

⁸ <https://www.bighospitality.co.uk/Article/2023/01/20/independent-restaurants-battered-as-cost-pressures-drive-hospitality-closures-above-covid-hit-years>

Brands such as Nando's, Greggs, Domino's Pizza, Five Guys, and Honest Burgers are performing well revenue-wise and are continuing to expand, which provides hope for the sector. Key trends predicted for the hospitality sector 2023 by industry experts, particularly the dining market include:

- A greater move towards more cost-effective restaurant models and brands.
- Collapse or sale of brands that are overleveraged and carrying debt, which are likely to be purchased by stronger performing brands.
- Opportunities for new businesses where landlords offer concessions on rent and premiums.
- Continued growth in customer demand for 'quick service restaurants' (QSR), brand franchising and drive-through formats.
- Increase in demand for sustainable dining, such as vegan or vegan friendly restaurants, and others that promote sustainable credentials (e.g. slow food, low carbon footprint, etc).

3.18 There is also the potential for restaurants and pubs to tap more into the growth in home deliveries following the impact of the pandemic; with the potential to reach new audiences and increase turnover at quieter times. The growth in use of delivery apps such as Deliveroo, Uber Eats, and Just Eat has helped many restaurant businesses reach more customers. Although the affordability of these services can be prohibitive, particularly for independent businesses, it remains to be seen whether the cost-of-living crisis will dampen demand given the associated price premium for this form of take out service.

3.19 The role of 'dark kitchen' where food for deliveries is cooked in a warehouse type environment, away from an existing restaurant establishment is also unclear at the present time. From a planning perspective this type of offer provides no benefits for town centre businesses but also avoids the problems often associated with delivery drivers / riders having to access a restaurant location which may be unsuited to necessary 'pick up' requirements. However, at the same time, only a few providers are likely to have a sufficiently large customer base to support a dedicated home delivery facility.

3.20 The popularity of street food, market halls and markets, and "meanwhile"/"pop-up" restaurants and bars has opened more opportunities for start-up hospitality brands and have served as a launch pad for many successful F&B brands (e.g. Honest Burger and Franco Manca). These more informal drinking and eating venues fulfil their desire to experiment and explore different styles of drink, food and new cuisines in exciting new and more informal environments. Trialling a "pop-up" site also represents an opportunity to test a new concept, gain a following, fine-tune details and secure investment before making a long-term commitment. The pop-up concept is also attractive to landlords and property companies who are increasingly nervous about signing long leases following numerous high profile restaurant closures.

CULTURAL SERVICES

3.21 Cultural services such as theatres and cinemas are a major contributor to the evening and night time economy, particularly in broadening the appeal to a wider demographic and increasing the draw of a particular centre. In turn this can also support the F&B sector.

Cinemas

3.22 The UK cinema sector has evolved dramatically since the 1990s when it was largely dominated by a handful of national multiples. Today the sector offer ranges from larger multiplexes, to smaller independent operators and 'pop up' venues. The following table sets out some of the main cinema operators in the UK. Notwithstanding the greater variety and choice in the cinema sector, the three largest cinema operators still account for around 70% of total UK screens. The six largest operators are collectively responsible for about 85% of the sector.

Table 4.4: Main cinema operators in the UK

Operator/ Brand:	No. of Cinemas	Position	Description:
Odeon/UCI	120	Multiplex	Established in 1930s. In July 2016, Terra Firma sold Odeon/UCI to the Chinese-owned AMC Entertainment group for £921m.
Cineworld	116	Multiplex	Established in 1995. Cineworld is the leading cinema operator in the UK by box office market share (based on revenue). However, the business announced in August 2022 its intention to file for bankruptcy and it entered administration in July 2023. There are currently no plans to close any of its outlets.
Vue	93	Multiplex	Established in 2003, following the acquisition of Warner Village for £250m. It has since grown through new development and acquisitions
Everyman	35	Independent	Established in 2000. Acquired the Screen Cinemas chain in 2008 and 4 cinemas from Odeon in 2015. Increased its revenue by 27% in 2018 and opened 7 cinemas in 2019.
Picturehouse (Cineworld)	25	Independent	Established in Oxford in 1989. Differentiated by its unique locations, homely atmosphere, and art-house film choices. Cineworld acquired the entire chain for £47.3m in December 2012.
Showcase	19	Multiplex	Established in 1986. Owned by National Amusements Inc
Merlin	17	Independent	Established in 1990. Operates 12 cinemas in Devon and Cornwall, and 5 others in Gloucestershire (Coleford), Norfolk (Cromer), Somerset (Wellington), Scotland (Thurso) and Wales (Prestatyn).
Empire	14	Multiplex	Established in 2005 but has its origins in the Empire on Leicester Square, which opened in 1884.
Curzon	13	Independent	Established in 1934. Operates 7 luxury 'art house' cinemas in London: Aldgate, Bloomsbury, Mayfair, Richmond, Soho, Victoria and, most recently, Wimbledon. Other cinemas in Canterbury, Colchester, Knutsford, Oxford, Ripon and Sheffield.
Reel	10+	Independent	Established in 2001, following the purchase of Curzon in Loughborough. Independently owned and branded as Reel Cinemas Ltd in 2005. Vue sold four cinemas to Reel (Fareham, Port Talbot, Burnley and Morecombe).
The Light	9	Independent	Established in 2007. Have multiplexes in Wisbech, Cambridge, Walsall, Bolton, Sheffield, Stockport, Bradford and Addlestone. Has trialed its first non-multiplex, 3-screen cinema in Thetford, Norfolk, which opened in 2016.

Operator/ Brand:	No. of Cinemas	Position	Description:
Movie House	3	Multiplex	Established in 1990. Based in Northern Ireland and acquired the UGC (ex MGM/Virgin) multiplex in Belfast City Centre. Also owns two other multiplexes in Northern Ireland.

Source: Various

3.23 The following provides a snapshot of the growth in the cinema market over the last 10-15 years and the impact of the COVID-19 pandemic based on current research:

- Total admissions in 2019 stood at 176.1 million. This was slightly down on 2018 (177m) but was still the second highest recorded admissions since 1970 (193m). Admissions in 2020 fell to 44m due to the impact of the COVID-19 pandemic, a reduction of 75% from 2019 (176.1 million) and the lowest level since records began (dating back to 1935).
- UK box office receipts consistently reached their highest recorded levels in 2017 (£1.278bn), 2018 (£1.277bn) and 2019 (£1.251bn) but fell to £297m in 2020.
- The number of cinemas has increased from 697 in 2006, to 801 in 2017 and 840 in 2019.
- The number of cinema screens has increased from 3,741 in 2010, to 4,564 in 2019.
- Approximately three-quarters (78.2%) of the screens are in multiplexes.
- The average population per screen in 2019 was estimated to be 14,529.
- Average annual spending per head on cinema trips has increased steadily from £12.93 per capita in 2005 to £18.72 per capita in 2019, before falling to £4.37 per capita in 2020.

3.24 Although year-on-year admissions and box-office taking's are notoriously volatile — driven by the appeal of individual films and Hollywood 'blockbusters' — the long-term trend since the mid-1980s has been upward and has principally been driven by the development of new cinemas. The growth in the cinema sector over the last 10-20 years is even more impressive when one considers that this has occurred alongside the increase in new and sophisticated in-home entertainment, driven by new technology, choice and flexibility (including, for example, Sky, Netflix and Amazon, and in 2020 the launch of Apple and Disney platforms).

3.25 As the competition in the sector has increased, cinema operators have responded by introducing changes to the cinema experience, including new innovations in technology, improvements to the auditoriums and the introduction of higher quality refreshments, alcohol and food. For example, Odeon has introduced their luxury 'Luxe' branding into a number of converted and new cinemas since 2017, and this evolved into the opening in 2019 of its premium 'Luxe & Dine' concept in London, which is specifically aimed at adults. Showcase also introduced their 'Cinema De Lux' branded multiplexes in 2014, with emphasis on customer service, lush décor, high quality food and other high-end amenities. However, demand for luxury end cinema venues are at present largely confined to London.

3.26 There has also been a growth in smaller (Digital) cinemas serving smaller catchment areas. These Digital cinemas are more flexible and less "space-hungry", as they do not require the large auditoriums needed to accommodate traditional projectors. There are therefore opportunities to provide a modern cinema offer in existing (repurposed) buildings and shopping centres, or as part of a mixed use offering. Other trends in the sector include the growth of 'pop-up' and community cinemas.

3.27 The COVID-19 pandemic had a significant impact on cinema attendances and sales in 2020, which led to a period of restructuring and consolidation across the industry. There is evidence that the cinema market is now recovering, with the UK Cinema Association recording 7 million admissions in June 2021 alone. However, the sector is still vulnerable. For example, Cineworld entered administration in July 2023; although we understand that their Picturehouse brand remains solvent in the UK.

- 3.28 Going forward, we would expect cinema trips to remain a significant and popular leisure activity for all age groups. Notwithstanding this, the competition from home entertainment and alternative at-home film channels will intensify and cinema operators will have to keep updating and adapting their offer to respond to consumer needs.

Theatres

- 3.29 Although the provision of new theatre space is a relatively rare occurrence, the theatre provision in Coventry, provides a good range of venues and events to appeal to a wide audience. The city centre offer of the Belgrade Theatre is complemented by the edge of centre Albany Theatre and the Criterion on the edge of Earlsdon District Centre. There is also theatre facilities at the Warwick Arts Centre.

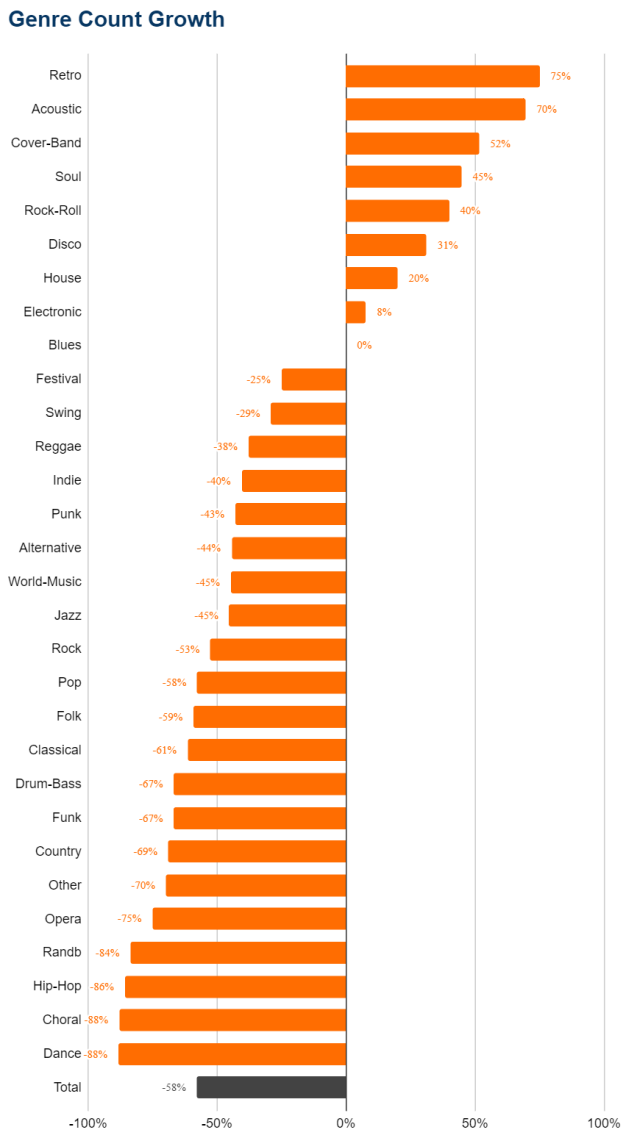
Music Venues

- 3.30 Music venues provide a wide range of facilities and experiences for visitors and range considerably in size, from a room within a different form of venue to large purpose-built concert halls or the occasional use of a large sporting or other venue. However, retaining such venues can be difficult when there are competing demands for space, particularly at grass roots level.
- 3.31 The sector has also faced additional challenges as a result of the Covid-19 pandemic and associated restrictions. This saw a significant decline (58%) in the overall number of live events organised in 2021 when compared to 2019⁹ but some growth sectors have been noted (see Figure 4.5).
- 3.32 In 2022 there was a significant recovery in live music performances and attendances, but grassroots music venues are continuing to struggle like many other service providers and it has been forecast that around 10% of all such venues could close in 2023¹⁰.

⁹ <https://www.ticketsource.co.uk/blog/live-music-report-2021>

¹⁰ <https://www.nme.com/news/music/uk-to-lose-10-per-cent-of-grassroots-venues-in-2023-as-calls-grow-for-rest-of-industry-to-invest-3499727>

Table 4.5: Change in Live Music Events 2019 – 2021



Source: <https://www.ticketsource.co.uk/blog/live-music-report-2021>

Gambling Venues

- 3.33 Spend on gambling ('games of chance') represents a relatively small proportion of the overall spend on leisure activities but includes a number of sectors that can be represented in town centres - bingo clubs, casinos, betting shops and amusement arcades. The latest research¹¹ figures show that the gambling industry in Great Britain generated a Gross Gambling Yield (GGY) for the year end to March 2021 of £12.7bn. This represented a decline of 11% on the previous year (to March 2020), which in turn was slightly lower than seen in 2017 to 2019. Remote (online) gambling significantly increased during the year as a result of the pandemic.
- 3.34 The period from 2017 to March 2021 also saw a decline in the number of premises used for gambling purposes. Between March 2020 and March 2021, the overall number of premises decreased by 1,502 (-14.8%) from 10,127 to 8,625. The majority of these (1,221) were as a result of a decline in non-remote betting but the period also saw the closure of 149 casinos, 82 arcades and 50 bingo venues.

¹¹ The Gambling Commission – Industry Statistics (April 2015 to March 2021)

Between March 2017 and March 2021, the total number of licensed premises decreased by 2,779 (-24.4%) from 11,404 to 8,625.

3.35 In terms of the different types of gambling:

- **Bingo Halls** - in response to falling admissions over a number of years bingo operators are increasingly taking advantage of the online market and embracing smart-phone technology through new 'app' development. This forms part of a wider trend and growth in 'remote/online' gambling, which includes gambling activities through the internet, telephone, radio, etc. Bingo operators are also increasingly looking to diversify their customer profile, and are marketing their clubs at a younger, predominantly female audience. As a result, there has been an increase in the number of younger and more affluent bingo players over recent years, particularly as deregulation has enabled clubs to offer bigger (national) prizes. At the opposite end of the scale, research shows that the 55-64 age group has generated the biggest growth in online gambling as more mature bingo players switch to online bingo sites, as they grow in confidence with the new technology. These trends have resulted in the closure of many bingo halls in centres across the UK with just 246 operating in March 2021 compared with 684 in 2017.
- **Casinos** – There has also been a significant decline in the number of casinos operating in the UK as a result of the growth of on-line activities. Of the 1,164 casinos operating in March 2017, only 117 remained by March 2021.
- **Betting Shops** – The number of high street betting shops has declined significantly in recent years, reflecting the increase in online betting and the merger and subsequent rationalisation of outlets by the main operators. As gambling activities continue their shift to online channels, so the demand for physical outlets will inevitably dampen in the future and betting shops will inevitably close. Notwithstanding this, the presence of betting shops in high streets is a contentious issue in any case due to the perceived social and economic impacts on households. The Government has recognised that betting shops have specific impacts and in 2016 reclassified their use from Class A2 to 'Sui Generis', and remain so under the new Use Class Order. This reclassification means local authorities have greater planning powers to manage the number of outlets and therefore greater potential to limit impacts.

NIGHT TIME ECONOMY

3.36 Both F&B and cultural services contribute to the night time economy in an area. This is increasingly being seen as an offer in its own right, not just as part of a city's entertainment offer, but part of the '24 hour city' where residents and visitors require access to a range of facilities and services throughout the evening and night-time periods, reflecting the increasing numbers of night-time and shift workers requiring access to services and facilities outside of normal daytime trading hours.

RECREATIONAL AND SPORTING SERVICES

Health And Fitness Facilities

3.37 For town centre and urban areas the key recreational and sporting services likely to be provided relate to health and fitness centres.

3.38 Pre-pandemic, the health and fitness market, including gyms and health clubs, was going from strength-to-strength, with the number of facilities in the UK increasing to 7,239 over the year to March 2019 (compared with 6,435 in 2016), and total membership growing by 4.7% to 10.4 million¹². However, the pandemic had a significant impact on the health and fitness market when establishments were required to close during lockdown periods or operated at low capacity to meet social distancing requirements.

¹² *State of the UK Fitness Industry Report (2019)*. Leisure DB (formerly the Leisure Database Company). The research is compiled by independent leisure market analysts,

3.39 This resulted in the number of UK gyms declining from a 10-year peak of 3,674 in 2020 to an estimated 3,060 in 2021¹³. The impact is even more pronounced on the sector's market value. Pre-pandemic the sector market value was steadily increasing annually; peaking at £2.25 billion compared to £1.49 billion in 2012. The impact of the pandemic led to market value dropping to £1.32 billion in 2021. However, early figures for 2022 indicate that market value has risen to £1.8 billion while the number of gyms has risen to 3,720, which is higher than pre-pandemic levels. This is a positive sign that the market is recovering, although, there are now uncertainties on how much the sector will grow in light of the current cost of living crisis.

3.40 Nonetheless, gyms and health/fitness facilities make an important contribution to the health and well-being of the population across all age levels. The table below shows the top 10 operators in the health and fitness sector in 2020, ranked by number of facilities.

Table 8.9: Main gym operators in the UK

Operator/Brand:	UK Facilities	Position	
Pure Gym	250+	Budget	Established in 2009. Acquired all gyms from LA Fitness in 2015. Most locations are open 24 hours and offer cardio equipment, fixed/free weights and exercise classes.
Anytime Fitness	166	Budget	24-hour health and fitness club. Membership rates vary by club. Operates on a franchise system.
The Gym Group	159	Budget	Established in 2007. 24-hour access. No fixed contract; membership starts from £10.99/month.
Snap Fitness	123	Mid-Market	Established in 2003. A privately owned and operated club. Operates on a franchise system.
David Lloyd Leisure	112	Premium	Established in 1982. Provide a family-orientated, high-quality fitness and leisure facility. Whitbread PLC acquired the company in 1995 for £182m. It is now owned by TDR Capital.
Nuffield Health	111	Mid-Market	Acquired 35 Virgin Active clubs in 2016 at a reported cost of £80m. Membership rates vary by club and locations, but start from circa £60/month.
Energie Group	100+	Mid-Market	Established in 2003. Clubs are typically between 5,000-25,000 sqft and comprise a café/ lounge area, fitness area, studio, locker rooms and showers. Many include spa areas, swimming pool, treatment rooms and spinning studios. Operates on a franchise system.
Bannatyne's	70	Premium	Established in 1997. Growth driven by new openings and acquisitions; including the purchase of the LivingWell Premier Health club chain from the Hilton Hotel UK Group in 2006. Also operates 37 spas and five hotels across the UK

¹³ www.statista.com

Operator/Brand:	UK Facilities	Position	
Exercise4Less	50+	Budget	Gyms are mainly located in the Midlands and North. Gyms in South are in Hounslow, Harlow, Southend, Milton Keynes, Bath and Bristol. Offer a full boxing ring and combat classes. Membership starts from £9.99/month off-peak.

Source: Various

- 3.41 Other major operators just outside the top 10 include Virgin Active, JD Gyms, Sports Direct and Total Fitness.
- 3.42 The structure of the UK health and fitness industry has evolved significantly over the last decade to reflect changes in consumer choice and trends, with value and budget gym operators having experienced the most significant growth in the sector in recent years.
- 3.43 According to figures by *Leisure DB* budget gyms now account for over one-third of gym memberships in the UK. The growth of the budget gym operators has resulted in the increasing polarisation of the gym sector between the budget operators at the value end of the spectrum, and the more exclusive health and fitness centres at the higher, more expensive end. As a result, analysts predict that those mid-market gym operators that are neither very cheap nor particularly exclusive will struggle to maintain market share in the competitive market place unless they revise their business models. Furthermore, as operators compete against the “*at-home fitness*” revolution (e.g. Peloton), boutique studios and tech-enabled fitness, they will need to evolve to be more than “*just gyms*”. As with trends in the retail sector, experiences and entertainment will be important to attracting and retaining customers. For example, there has been continued investment into ‘*fitness-tainment*’ over the last few years and analysts predict that there is plenty of opportunity for future growth.

Other Commercial Leisure

- 3.44 Other commercial leisure facilities are often classified as ‘family entertainment venues’ (FEVs), which include paid activities that appeal to adults and children (such as, for example, tenpin bowling, roller skating, ice skating, and similar uses).
- 3.45 **Tenpin bowling** is possibly the most popular activity in the ‘family entertainment’ sector. After a period of decline in the 1970s, there are now 316 venues in the UK according to Mintel figures. The UK tenpin bowling market was valued at £285m in 2017. This represented a +9.7% year-on-year growth and represented the fifth consecutive year of growth. A number of the successful bowling facilities opened over the last 15-20 years (e.g. Hollywood Bowl and Ten Entertainment)¹⁴ tend to form part of larger leisure complexes that include multi-screen cinemas, restaurants and nightclubs. The critical mass of leisure uses “*under one roof*” help to underpin the viability of tenpin bowling centres, as they tend to struggle as standalone destinations. The sector is evolving from old-style bowling alleys, to modern, multi-generational entertainment centres where bowling is blended with other forms of activity alongside an enhanced dining offer, along with smaller independent specialist bowling facilities (such as, for example, All Star Lanes and Bloomsbury Bowl)¹⁵.

¹⁴ Hollywood Bowl is the market leader in the tenpin bowling sector. It operates 59 venues under the Hollywood Bowl, AMF and Bowlplex brands. Its expansion has been driven by opening new sites, including recently in Dagenham and Yeovil. Ten Entertainment operates 44 venues and its growth strategy is focussed more on acquisitions of distressed assets than opening new venues, and then modernising the facilities to drive growth and value.

¹⁵ All Star Lanes operates five bowling venues, including four are in London (Brick Lane, Holborn, Stratford City and White City) and is largely targeted at the corporate/private hire market. Bloomsbury Bowl also operates from smaller venues with sites in Bloomsbury (8 lanes) and Bristol (5 lanes).

3.46 Over recent years there has also been growth in other more specialist commercial leisure attractions, such as **trampoline parks**. Trampolining has become one of the UK's fastest growing sport and leisure trends. It is estimated that there were some 150 parks in the UK in 2017/18, with the potential capacity for between 250-300 parks before saturation is potentially reached. The main operators in this sector include Oxygen Freejumping¹⁶, Ryze¹⁷, and Gravity Active Entertainment¹⁸. There is also an emerging market in **multi-activity leisure venues** promoted by niche operators that offer a range of activity leisure uses under one roof. Examples include venues that include skateboard, snowboarding, BMX, free Ski, parkour, and climbing activities, alongside other activities. Active leisure venues such as those described above typically attract wider families and groups, who are generating 'spin-off' expenditure to other uses and facilities both within and outside the venues.

SUMMARY OF NATIONAL TRENDS

3.47 This section has shown that the commercial leisure industry faces considerable challenges and pressures. It is clear that consumers are becoming increasingly selective in terms of where and how they spend their discretionary leisure spending but new activities and innovative offers will continue to evolve and attract people.

3.48 However, there will also be a continued increase in at-home activities due to the advances in computers, tablets, television, gaming, and audio technology. The challenge for town centres and leisure operators in the future will be how to attract customers away from their homes.

EXPERIENCE IN COVENTRY

3.49 Within Coventry, the City Centre has historically been the main draw for leisure activities and the ability to provide a choice of activities and venues in a concentrated area is likely to benefit both the individual businesses and the overall draw.

3.50 The City Centre has a strong and varied offer of F&B outlets and provides a range of leisure activities, including a theatre, multiplex cinema and casino. Live music venues include the hmv Empire and a range of smaller venues. There is also a choice of nightclubs.

3.51 The centre also has a good range of sports and fitness venues including The Wave (indoor waterpark), The Ballroom climbing centre and the Planet Ice Arena, all of which are likely to be important draws. This more specialist provision is supplemented by a range of gyms and fitness centres in, or close to the City Centre.

3.52 The City Centre also offers a range of other activities, including Laser Quest and the Boom Battle Bar, with the latter providing a mix of games and activities and a F&B offer. This is a good example of the way leisure entertainment is currently evolving. The SideQuest Gamers Hub also reflects recent trends.

3.53 Maintaining the City Centre as the main location for both traditional and new leisure and entertainment activities will be important for the future health of the centre and should therefore be a key policy aim.

¹⁶ Oxygen Freejumping has parks in Acton (West London), the O2 in Greenwich, Croydon, Derby and Southampton. It also acquired Air Space in 2017, a subsidiary of the high wire adventure company Go Ape. However pre-pandemic Oxygen closed parks in East Kilbride (June 2018) and Wolverhampton (December 2018) due to reported "trading difficulties".

¹⁷ Ryze is a Scotland-based operator with three parks in Edinburgh, Glasgow and Dundee. These parks range in size from 929 sqm (10,000 sqft) to 1,208sqm (13,000 sqft).

¹⁸ Gravity Active Entertainment is a Castleford-based operator with 11 parks, mainly as part of existing shopping or adventure centres. Its venues include the Xscape in Castleford and Milton Keynes, Bluewater Shopping Centre and Riverside Entertainment Centre (Norwich).

- 3.54 Elsewhere in Coventry there is a range of leisure provision both within and outside of the MDCs and district centres. The F&B offer within most centres has increased over time reflecting national trends.
- 3.55 In terms of gambling venues and specifically betting shops, provision within Coventry has not changed significantly since 2010. The total number of units in the main centres has declined by just one, with the City Centre reducing by 2 and the Earlsdon outlet closing. However, Ball Hill and Foleshill have both seen provision increase from 1 unit to 2.

Table 8.10: Betting Office/Casinos in Coventry's centres

Centre	No. Betting Shops / Casinos 2014	No. Betting Shops / Casinos 2022
Coventry City Centre	10	8
Arena Park MDC	0	0
Brandon Road MDC	0	0
Cannon Park MDC	0	0
Ball Hill DC	1	2
Bell Green DC	1	1
Brade Drive DC	0	0
Daventry Road DC	2	2
Earlsdon DC	1	0
Foleshill DC	1	2
Jardine Crescent DC	1	1
Jubilee Crescent DC	2	2
Total	19	18

Source: Coventry City Wide Shopping and Centres Study 2014 Update and LSH Health Checks 2022

4. HEALTH CHECKS

- 4.1 The Stage 1 report included a retail audit of Coventry City Centre and the 12 district centres within the city (Section 5). This review provides a more in-depth assessment of the health of these centres, with the main findings provided in Appendix A.
- 4.2 These assessments provide an overview of the relative 'health' of the centres by establishing their current vitality and viability based on a range of key performance indicators (KPIs) set out in the Planning Practice Guidance (PPG). The PPG suggests that the following may be relevant in assessing the health of a town centre:
- Diversity of uses
 - Proportion of vacant street level property
 - Commercial rents yields on non-domestic property
 - Customers' experience and behaviour
 - Retailer representation and intentions to change representation
 - Pedestrian flows
 - Accessibility
 - Perception of safety and occurrence of crime
 - State of town centre environmental quality
 - Balance between independent and multiple stores
 - Barriers to new businesses opening and existing businesses expanding
 - Extent to which there is an evening and night time economy offer
- 4.3 The various data sources used include:
- Experian Goad and LSH survey data (outlets and floorspace averages, diversity of uses and vacancies)
 - Datscha (footfall);
 - Property Market Analysis (PMA) Promis (competitive position)
 - CoStar (rents);
 - Household Survey (customer experience and behaviour); and
 - UK Crime Stats and West Midlands Police (crime statistics).
- 4.4 This information has been supplemented by desk based analysis and site visits to the centres which has informed observations on retail and leisure representation and the quality of environment.
- 4.5 However, not all information is available for all centres nor is all of it sufficiently up-to-date or robust to reflect the changes seen since the pandemic. This is particularly true of rent and yield data where closures have tended to characterise the market since 2020 and, those transactions that have been undertaken are often too few to provide reliable information. This problem increases as the size of centre decreases.
- 4.6 The information collected for each centre has been used to identify the Strengths and Weaknesses of each centre; the Opportunities for future sustainable development and any current and potential

Threats to their overall vitality and vitality (SWOTs). The key findings are summarised below, with the detailed health checks for each centre provided in Appendix A.

COVENTRY CITY CENTRE

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • A relatively compact, walkable city centre. • Strong retail anchors in the form of M&S and Primark, attracting customers to the City Centre. • The centre has a good range of services, including a strong leisure services offer, including F&B. • Recent developments have provided new modern buildings, public realm enhancements and shared spaces. • Good quality museums, theatres, cathedrals and other significant heritage assets serve to improve the 'place' offer and broaden the range of attractions. • Good range of leisure / entertainment activities. • Regular bus services to and from different parts of the City and neighbouring areas. • The highway network including a Ring Road enables movement around the City Centre and the wider City by car. 	<ul style="list-style-type: none"> • A limited Comparison Retail offer beyond principally mass-market multiples and high street fashion retailers. • A high and rising vacancy rate, well above national average levels, suggesting over-supply and/or a lack of demand. • Declining footfall • Poor gateways or perception of poor gateways into the City Centre with the ring road discouraging pedestrian visits. • Parts of the centre have poor pedestrian and/or cycling environments. • Perception of poor integration and accessibility within the centre.
Opportunities	Threats
<ul style="list-style-type: none"> • Emerging developments and regeneration proposals, including City Centre South and Friargate, acting as a catalyst for further inward investment and 'place' improvements. • The introduction of improved evening economy uses, including more / better places to eat out (identified by household survey respondents as an area for improvement) would improve dwell time and extend the hours of activity into the evening, building on existing leisure offer. • Improved access or signposting of access to the City Centre and within it to improve integration and local awareness. 	<ul style="list-style-type: none"> • Trends in the retail sector (i.e. retailers 'downsizing' to fewer prime locations and online shopping) and the implications for retailer demand may make it difficult to reverse the trend of rising vacancies and below average comparison provision. • Competition from competing centres and stores both within and outside of Coventry for retail occupiers. • Competition from competing centres for emerging leisure uses or closures of existing businesses.

Conclusions

Coventry City Centre is generally a vital and viable centre, serving shoppers from across the City and beyond, particularly for comparison shopping. However, it is demonstrating clear signs of weakness, including a declining comparison offer and high and increasing vacancy rates.

However, the centre has a strong leisure service-orientated function, including a reasonably strong F&B offer. This provides a good basis for a diversified city centre offer which, together with the delivery of planned new developments and improvements, will help to ensure the City Centre's continued health and role at the top of the City's retail hierarchy. Key to this will be identifying and implementing an appropriate policy response to addressing the issue of rising vacancies.

ARENA PARK (MAJOR DISTRICT CENTRE)

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> The centre is a modern, purpose-built retail centre in a single ownership. Tesco Extra is an important anchor, catering for the main food shopping needs of the immediate area and attracting high visitor numbers to the centre. The centre has a strong comparison retail line-up including Decathlon, M&S and Next. Footfall has increased significantly since pre-pandemic levels, while pedestrian activity remained strong during the pandemic (most likely due to the presence of the Tesco Extra superstore which remained open). The centre is served by rail (via Coventry Arena train station) and bus services. The centre is easily accessible by car and has extensive surface car parking. 	<ul style="list-style-type: none"> The centre is lacking a broad range of services commensurate with its role and function as a Major District Centre (i.e. to meet the day-to-day needs of local residents and reduce their need to travel for such provision). The centre's leisure offer consists of limited F&B options and no other evening economy provision (necessary to improve customer 'dwell time' within the centre). The centre provides modern shopping facilities yet the overall shopping environment is dominated by extensive customer car parking.
Opportunities	Threats
<ul style="list-style-type: none"> The centre is in a single ownership aiding the management and longer term planning for the centre. The introduction of more services and evening economy uses would complement the centre's strong retail offer. 	<ul style="list-style-type: none"> Competition from other centres and stores.

Conclusions

Arena Park MDC is a strong, modern purpose-built shopping centre anchored by a large Tesco Extra superstore and providing large footprint retail units for a number of major comparison retailers (i.e. Decathlon, M&S and Next). Footfall data shows the centre attracts high and increasing visitor numbers and the centre is healthy, vital and viable.

However, the centre needs a broader range of retail and leisure services – including F&B options – to improve its role and function as a Major District Centre serving the north of the City, whilst not competing with the City Centre offer.

BRANDON ROAD (MAJOR DISTRICT CENTRE)

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • The Centre provides a range of large, modern format stores suitable for modern retailer requirements. • Morrisons and M&S Simply Food cater for the main food shopping needs of the centre’s users. • The Centre has seen a sharp increase in pedestrian activity during 2023. • The centre is easily accessible, with a prominent location off the A46 and extensive surface car parking. • The centre is served by local bus services routes. • 	<ul style="list-style-type: none"> • The centre is lacking a broad range of services commensurate with its role and function as a Major District Centre (i.e. to meet the day-to-day needs of local residents and reduce their need to travel for such provision). • Brandon Road has a limited F&B offer and the main units are not well integrated with the main shopping attractions. • The overall shopping environment is dominated by extensive customer car parking.
Opportunities	Threats
<ul style="list-style-type: none"> • Improving pedestrian connections between the main shopping areas (namely Morrisons and Warwickshire Shopping Park) to provide better levels of pedestrian accessibility and experience. • Introduce a wider range of services to cater for the basic needs of local residents and other users of the centre, including but not limited to retail services and more F&B options to improve dwell time. 	<ul style="list-style-type: none"> • Trends in the retail sector (i.e. retailers ‘downsizing’ to fewer prime locations, online shopping) and the implications for occupier demand. • Competition from competing centres and stores.
<p>Conclusions</p> <p>Brandon Road appears to be a healthy centre with strong retail attractions, rising levels of footfall and few vacant outlets at present. The centre has a strong shopping function but needs a broader range of retail and leisure services – including F&B options – to improve its role and function as a Major District Centre serving the east of the City, whilst not competing with the City Centre offer.</p>	

CANNON PARK (MAJOR DISTRICT CENTRE)

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • Strong convenience retail offer in the form of Tesco, Aldi and Iceland. • A limited selection of national multiple comparison retailers and range of independent stores, with a focus on value-orientated retail. 	<ul style="list-style-type: none"> • The centre is under-represented in terms of leisure services including F&B, and there is no evening / night time economy provision.

<ul style="list-style-type: none"> • Limited range of services to meet the day-to-day needs of local residents and other users of the Major District Centre. • A very low and declining vacancy rate. • Good accessibility by car and substantial car parking. • Proximity to a substantial student population, including the Vita Student development within the centre boundary. • The centre is served by local bus services routes. 	
Opportunities	Threats
<ul style="list-style-type: none"> • Introduce a wider range of services including F&B options, which would help to sustain dwell time and levels of activity into the evening. • Improve pedestrian connections between the main shopping areas, including a crossing point linking the shopping centre with the Aldi foodstore. • Greater provision for student population (noting that use may not be year round). 	<ul style="list-style-type: none"> • Trends in the retail sector (i.e. retailers 'downsizing' to fewer prime locations, online shopping) and the implications for occupier demand. • Further decline in pedestrian activity. • Competition from competing centres and stores, including future development at Eastern Green MDC.
<p>Conclusions</p> <p>Cannon Park appears to be a healthy centre. It has a very low vacancy rate, a strong line-up of foodstores (namely Tesco, Aldi and Iceland) and a selection of value-orientated comparison retailers and retail services, notwithstanding the recent Wilko store closure. That said, footfall data suggests that pedestrian activity has not recovered to pre-pandemic levels despite the Vita Student development and proximity to Warwick University, which are likely to be key footfall drivers during term times.</p> <p>The centre needs a broader range of retail and leisure services – including F&B options – to improve its role and function as a Major District Centre serving the south of the City, whilst not competing with the City Centre offer.</p>	

BALL HILL (DISTRICT CENTRE)

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • The centre has a good selection of convenience retail outlets, including both national multiples and independents. • Ball Hill is well represented by a range of day-to-day services. • The centre's vacancy rate (as a proportion of the total number of outlets) has fallen since 2013 and currently stands at less than half the UK average. • The centre is well served by local bus services. 	<ul style="list-style-type: none"> • The centre lacks a main foodstore to anchor the centre and cater for local residents' main food shopping needs. • Levels of footfall within the centre have not returned to pre-pandemic levels. • High traffic flows have a detrimental effect on the shopping environment and disconnect the businesses on either side of Walsgrave Road. • The appearance of the centre is below average.

Opportunities	Threats
<ul style="list-style-type: none"> • Half of household survey respondents living close to Ball Hill said their household never visits the centre. There are good opportunities to increase the local customer base, as well as encourage existing users to visit the centre more frequently for shopping and services. • Targeted environmental improvements (such as public seating, planters and shop front improvements) to enhance the centre's attractiveness and environmental quality. 	<ul style="list-style-type: none"> • Competition from larger centres nearby and out-of-centre retail and leisure provision. • Further decline if footfall.
<p>Conclusions</p> <p>Ball Hill shows signs of being a vital and viable centre given its low vacancy rate and strong convenience and services orientated offer, which appears relevant to the day-to-day needs of local residents. Notwithstanding this, footfall data indicates that pedestrian activity has not returned to pre-pandemic levels, while the centre is faced with environmental quality issues including traffic flows / congestion along Walsgrave Road and the general appearance of the centre.</p>	

BELL GREEN (DISTRICT CENTRE)

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • The centre caters reasonably well for the basic shopping and service needs of the centre's users. • The centre's vacancy rate (as a proportion of the total number of outlets) has reduced over the period since 2013 and is now close to the UK average. • The centre has seen strong levels of pedestrian footfall since the pandemic. • The centre contains free surface level car parking and is well served by local bus services. 	<ul style="list-style-type: none"> • The centre has no main food store anchor following the closure of Aldi. • The centre has a limited comparison shopping offer. • The centre lacks Financial & Business Service uses to serve the day-to-day needs of local residents. • The centre's F&B offer lacks choice and there are no restaurants, bars or public houses. • Riley Square has a poor quality physical appearance. •
Opportunities	Threats
<ul style="list-style-type: none"> • Proposed redevelopment / investment of Riley Square. • Potential to introduce more services and community facilities within the centre's vacant outlets. • Environmental improvements including a new public realm within Riley Square, signage, seating, planters and shop front improvements. 	<ul style="list-style-type: none"> • Continued uncertainty as to when the investment plans for the centre will be realised. • Competition from nearby larger centres (e.g. Arena Park) and out-of-centre retail and leisure provision.

Conclusions

Bell Green District Centre appears to be a vital and viable centre overall within the limitations of its convenience-based function and localised catchment. Its strengths include a reasonable convenience shopping offer, a declining vacancy rate, and relatively strong levels of pedestrian footfall.

However, the District Centre is lacking Financial & Business Services and diversity in its F&B / evening economy offer and has experienced the closure of Aldi. The centre is also faced with environmental quality issues at Riley Square, and planned investment has still to come forward.

BRADE DRIVE (DISTRICT CENTRE)

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> The Asda store is a strong anchor and caters for the main food shopping needs of the centre's users, as well as providing a basic range of comparison goods. The centre is served by local bus services. The centre is accessible by car and there is good provision of surface level car parking. 	<ul style="list-style-type: none"> The centre lacks a basic range of services and comparison retail outlets. The centre has no F&B offer to support the evening / night time economy. The lack of vacant outlets may be a barrier to new businesses. Levels of footfall within the centre have not bounced back to pre-pandemic levels.
Opportunities	Threats
<ul style="list-style-type: none"> Potential to extend the centre offer by more intensive use of the site, particularly the extensive surface car parking. Introduction of a wider range of uses commensurate with the role of the District Centre, including the introduction of new F&B / evening economy uses to improve dwell time. 	<ul style="list-style-type: none"> Competition from the adjoining out of centre retail park and larger centres (e.g. Arena Park) nearby. Failure to develop the range of offer leaving the Asda to function as a standalone store. Further decline in footfall.

Conclusions

Brade Drive is the City's smallest District Centre (in terms of the number of outlets) with just 7 outlets. It is anchored by a large Asda store which provides a main food shopping function in addition to a limited non-food shopping and services offer. The store helps to sustain the centre's small-scale retail services. There is also a Buzz Bingo.

Despite being a vital and viable centre within the limitations of its overall offer, footfall data shows that pedestrian activity within the centre remains well short of pre-pandemic levels. Brade Drive needs a broader range of services – including F&B options – to ensure its future health and improve its role and function as a District Centre.

DAVENTRY ROAD (DISTRICT CENTRE)

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • The Centre caters well for the day-to-day shopping and service needs of the centre's users. • The centre is anchored by a modern Asda supermarket. • The centre includes a good mix of national multiples and independent businesses. • The centre has strong levels of pedestrian footfall since the pandemic. • The centre is well served by off-street car parking in addition to local bus services. • The adjacent Quinton Park contributes to the attractiveness of the centre. 	<ul style="list-style-type: none"> • There is a lack of leisure services (including F&B) within the centre. • The centre has a reasonably limited and declining comparison shopping offer in terms of the number of outlets.
Opportunities	Threats
<ul style="list-style-type: none"> • The introduction of F&B / evening economy uses to improve dwell time and extend activity into the evening. 	<ul style="list-style-type: none"> • Loss of bank and financial services offer. • Competition from nearby larger centres and out-of-centre retail and leisure provision.
<p>Conclusions</p> <p>Daventry Road District Centre appears to be a healthy, vital and viable centre. It includes a modern Asda store together with a good range of small shops and services which cater for the day-to-day needs of local residents. It also has a popular financial services offer. A relatively high proportion of the centre's outlets (44%) are occupied by national multiples, and footfall levels in the centre are higher than pre-pandemic. The centre's vacancy rate has risen since 2013 but remains broadly in line with the UK average.</p> <p>Daventry Road would benefit from an expanded leisure offer, including evening / night time economy uses, to extend the hours of activity and improve its role and function as a District Centre.</p>	

EARLSDON (DISTRICT CENTRE)

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • Convenience retail provision in Earlsdon District Centre caters well for the top-up food shopping needs of the centre's users. • The centre has a reasonable range of service and community facilities, including a library. 	<ul style="list-style-type: none"> • The centre lacks a main foodstore to cater for local residents' main food shopping needs. • There are no financial services (e.g. banks) within the centre. • Levels of footfall have not recovered to pre-pandemic levels.

<ul style="list-style-type: none"> • The centre has a strong F&B offer including cafes, restaurants and pubs. • The Criterion theatre is located within walking distance of the centre. • The centre includes a good mix of national multiples and independent businesses. • The centre is well served by on-street parking bays in addition to local bus services. • The centre is within a conservation area and provides an attractive environment with a range of architectural styles represented. 	<ul style="list-style-type: none"> • The centre has a lack of safe crossing points along Earlsdon Street.
Opportunities	Threats
<ul style="list-style-type: none"> • The centre is a popular evening destination. • Targeted environmental and public realm improvements such as more crossing points, modern paving and landscaping materials could encourage dwell time and enhance the centre's appeal to customers. 	<ul style="list-style-type: none"> • Competition from nearby larger centres and out-of-centre retail and leisure provision. • Continued decline in daytime footfall.
<p>Conclusions</p> <p>Earlsdon District Centre is an attractive, traditional linear centre within a designated Conservation Area. It includes a mix of national multiples and independent businesses and the centre's vacancy rate is below the UK average. The centre therefore appears healthy and offers a balanced mix of uses to serve its localised catchment, catering well in terms of top-up food shopping and service and community facilities. Earlsdon also has a strong F&B offer including cafes, restaurants and pubs and a theatre on the edge of the centre.</p> <p>However, footfall remains below pre-pandemic levels and the centre has seen a decline in its retail offer. Environmental improvements including safe crossing points along Earlsdon Street may assist in ensuring the centre maintains a vibrant daytime economy to complement the evening offer.</p>	

FOLESHILL (DISTRICT CENTRE)

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • The centre has a good selection of independent businesses including specialist and ethnic food and non-food stores, which help to create a distinctive offer. • The centre caters well for the day-to-day food shopping needs of the centre's users 	<ul style="list-style-type: none"> • High traffic flows have a detrimental effect on the shopping environment and disconnect the businesses on either side of Foleshill Road. • The centre is not used by a high proportion of local residents

<ul style="list-style-type: none"> • The centre is well served by local bus services. • Footfall levels have been relatively stable between the period September 2018 – August 2023, with pedestrian activity remaining strong during the pandemic. 	<ul style="list-style-type: none"> • The centre's F&B offer lacks diversity and there are no bars or public houses to support the evening / night time economy. • There is limited car parking available within the centre, with most provided as restricted on-street car parking.
Opportunities	Threats
<ul style="list-style-type: none"> • There is a large resident population close to the centre that does not currently visit. • Targeted environmental improvements (such as signage, seating, planters and shop front improvements) and consideration for the branding and/or marketing of the centre would enhance its attractiveness and appeal to customers. 	<ul style="list-style-type: none"> • Competition from nearby larger centres (e.g. Arena Park) and the City Centre. • Inability to attract local trade and loss of expenditure from the area.
<p>Conclusions</p> <p>Foleshill is one of the City's largest District Centres and provides a good range of independent and specialist retail and service uses. Pedestrian footfall throughout the centre continues to be strong and vacancies are slightly below the UK average. Overall, the centre appears to be a reasonably vital and viable centre within the limitations of its convenience-based function and localised catchment.</p> <p>However, the centre lacks diversity in its F&B / evening economy offer and is also faced with challenges in relation to traffic, car parking and environmental quality issues. More should be done to promote and enhance Foleshill's specialist and ethnic shopping offer, in order to make it more distinguishable from competing provision and more attractive to customers (including the many local residents who 'never' visit the District Centre according to the household survey).</p>	

JARDINE CRESCENT (DISTRICT CENTRE)

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • The centre is purpose built to serve the local population. • The centre's convenience retail offer provides for the basic food shopping needs of local residents. • Good representation by national multiples. • The centre has a reasonable range of service and community facilities, including a library. • The centre is compact and easily accessible for pedestrians. • Stronger levels of pedestrian footfall since the pandemic. 	<ul style="list-style-type: none"> • The centre lacks a foodstore 'anchor' suitable for main food shopping trips. • Closure of Boots and loss of pharmacy. • There is a limited number and range of comparison retail outlets. • The centre's F&B offer lacks diversity. • Restricted catchment.

<ul style="list-style-type: none"> • The centre is well served by on-street parking bays in addition to local bus services. • The adjacent Limbrick Wood contributes to the centre's environmental quality. • The centre's vacancy rate (as a proportion of the total number of outlets) is low and stable. 	
Opportunities	Threats
<ul style="list-style-type: none"> • Environmental and public realm improvements in and around the main shopping precinct (including the provision of public seating, planters and wayfindings) to enhance the centre's overall attractiveness and appeal to customers. 	<ul style="list-style-type: none"> • Competition from nearby larger centres (e.g. Cannon Park) and out-of-centre retail and leisure provision. • Loss of national multiples as a result of company rationalisations.
<p>Conclusions</p> <p>Jardine Crescent is a small and compact District Centre comprising 21 outlets – only one of which is currently vacant. Within the limitations of its small scale, the centre provides a good range of retail and service uses (4 comparison retail, 5 convenience retail and 11 services) to meet the day-to-day needs of local residents and includes a relatively high number of national multiples. This is supported by the footfall data, which shows the centre is attracting higher levels of footfall than pre-pandemic.</p> <p>Jardine Crescent is therefore a healthy, vital and viable centre overall. However, it lacks a foodstore for main food shopping trips and has experienced the recent closure of its Boots pharmacy. The centre would also benefit from a more diverse F&B offer.</p>	

JUBILEE CRESCENT (DISTRICT CENTRE)

SWOT Analysis

Strengths	Weaknesses
<ul style="list-style-type: none"> • The central greenspace contributes substantially to the attractiveness of the centre. • The Asda foodstore provides an anchor for the centre and caters for the food shopping needs of local residents. • The centre includes a good mix of comparison retail outlets within the limitations of its small scale. • The centre's vacancy rate has remained low for several years. • Very strong levels of pedestrian footfall since the pandemic. • The centre is highly accessible on foot from the surrounding residential areas. • The centre is well served by on-street car parking in addition to local bus services. 	<ul style="list-style-type: none"> • The centre's F&B offer lacks diversity and choice, being dominated by fast food and takeaways. • There are a lack of safe crossing points around Jubilee Crescent.

Opportunities	Threats
<ul style="list-style-type: none"> The introduction of F&B / evening economy uses to improve dwell time and extend activity into the evening. 	<ul style="list-style-type: none"> Competition from nearby larger centres and out-of-centre retail and leisure provision. Loss of national multiples due to company rationalisations.
<p>Conclusions</p> <p>Jubilee Crescent is a healthy, vital and viable centre. It continues to have a very low vacancy rate (currently just one vacant outlet) and very strong levels of pedestrian footfall since the pandemic, which underlines the centre's resilience and relevance to its catchment. To that end, the District Centre (specifically the Asda store) caters for the main food shopping needs of local residents and the centre also includes a mix of retail and service uses, with good representation from national multiples.</p> <p>This is all provided in an attractive setting centred around a large green space, providing the centre with a unique appeal.</p> <p>However, the centre's F&B offer lacks diversity and choice. The introduction of a more varied offer would improve customer choice and potentially expand the evening offer.</p>	

LOCAL CENTRES

- 4.7 In addition to the district centres and city centre, the Coventry Local Plan identifies 25 locations as local centres within the retail hierarchy (Policy R3), which was based on a 2015 Evidence Base study.
- 4.8 These centres have been revisited¹⁹ as part of the current study and a summary of the retail and leisure uses available within these centres is provided at Appendix A4. Our comments on each of the centres is set out below, with relevant comparisons with the 2015 data provided²⁰.
- 4.9 **Acorn Street** is a small local centre comprising just 8 units. It has a good convenience / top-up food shopping facility in the form of a Budgens supermarket, a pharmacy and a range of other service and community uses. With just 1 vacant unit, the centre appears to be performing as would be expected for a local centre.
- 4.10 **Ansty Road** is located around the junction of the A4600 Ansty Road and the Seaway/Hipswell Highways. It comprises of 15 units including a Co-op supermarket and a further convenience store, as well as a Post Office. At the time of the survey 2 units were vacant, representing an increase of 1 on 2015, but one of these appeared to be in the process of refurbishment. As a result it is concluded that the centre is continuing to perform as expected for a local centre.
- 4.11 **Baginton Road** is a small local centre comprising just 6 units, although there is a dental surgery and place of worship located on the north side of the road, outside of the centre boundary. The centre provides a good mix of uses for its size including a convenience store, post office and pharmacy.
- 4.12 **Banner Lane** is a small, purpose-built centre serving an area of new housing. The uses include a public house in the largest unit as well as a convenience store, pharmacy and comparison and F&B uses. Unusually for a local centre, it does not include any retail service uses.
- 4.13 **Barkers Butts Lane** is one of the larger local centres in Coventry and is centred around the junction of Barkers Butts Lane with the B4107 Moseley Avenue. It comprises 43 units and includes a number

¹⁹ July/August 2023

²⁰ Coventry City Council - Local Centres Assessment 2015

of specialist uses including school uniform shops and the Rialto Event space. There is also a strong retail service offer in the form of hair and beauty salons and takeaway F&B provision.

- 4.14 **Binley Road** is a medium sized centre consisting of two larger supermarket units (occupied by Lidl and Iceland) alongside a more traditional parade of shops with residential accommodation above. This includes a number of smaller retail units located within Empress Arcade, which links the shop units with off-street parking to the rear. There is also a public house located on the opposite side of the road.
- 4.15 **Birmingham Road** is a small centre with the majority of shop units located on the north side of the road, with just a single unit (Post Office) on the south. Although it has just 5 units these include a convenience store (One Stop), a pharmacy and post office. There are no vacancies in the centre.
- 4.16 **Broad Park Road** is located within the residential area it serves and includes a One Stop convenience store, a post office and 5 other units. However, one of these is currently vacant meaning the overall offer is limited.
- 4.17 **Charter Avenue** is a small but relatively dispersed centre comprising just 7 units including a church and a public house. The limited retail offer includes a convenience store and post office. The units benefit from parking in front of the shops.
- 4.18 **Far Gosford Street** is the largest of the local centres and is located within the City Centre boundary, on the east side. It consists of a traditional linear high street with a large number of historic buildings and new development at the western end closest to the city centre. The latter include a Sainsbury's Local foodstore, whilst the older units include a nightclub and an extensive range of F&B units. However, the current boundary does not include all the new development at the western end of the centre. There is also a good range of convenience outlets and independent retail service operators but a more limited comparison retailing reflecting the proximity of the Primary Shopping Area. Vacancies currently total 10 units, down from the 17 recorded in 2015.
- 4.19 **Green Lane** is another small local centre but one which has seen some positive changes since 2015. There continues to be one vacant unit in the centre, but the overall offer has been increased by the addition of a new takeaway business at the southern end of the centre. The centre also now includes a Morrisons Daily (replacing McColls following a company acquisition) and a post office.
- 4.20 **Hillfields** is one of the larger local centres and is centred around Victoria Street, with car parking provided to the rear off Wellington Street. It is located in the centre of the residential area it would be expected to serve and away from the main road network. It has a strong independent offer, with very limited national multiple representation (Londis convenience store, Paddy Power betting shop and Costa within another convenience store). The mix of uses is also orientated towards a food and F&B offer, with the Royale Mint banqueting suite also providing a unique offer.
- 4.21 **Holbrook Lane** local centre is located around and to the south of the Parkgate Road and Holbrooks Lane junction and is anchored by a Morrisons supermarket. The rest of the centre comprises a mix of convenience, comparison and F&B independent businesses split into two main areas and divided by a car dealership. The centre also includes a petrol station to the south.
- 4.22 **Holyhead Road** is a medium sized centre located on the south side of the A4114. There is also a petrol station on the north side of the road and a small group of business uses on the west side of Greyswood Avenue, just outside the centre. The centre comprises a parade of shops anchored by a Tesco Express at the western end, with a mix of independent retail, F&B and service businesses operating in the remainder.
- 4.23 **Keresley Road** is a small centre located around the junction of the B4058 and The Scotchill. It includes three convenience stores (one with a post office) but otherwise has a slightly unusual composition for its size including a car dealership and a public house. There is also an estate agent located on the west side of the B4078 that is currently included within the centre.

- 4.24 **Longford** is a medium sized centre that was extended in the last local plan review to include the health centre to the south of the main retail area. The rest of the centre is relatively dispersed and extends along both sides of Longford Road, with a number of larger footprint uses separating the main retail provision. The centre is predominantly occupied by independent businesses and currently has 5 vacant units, an increase on the 3 seen in 2015.
- 4.25 **Quorn Way** is a small, purpose-built centre with a limited offer comprising three convenience stores, a public house, a takeaway and a funeral directors. The remaining two units are currently vacant.
- 4.26 **Radford Road** is a traditional, linear centre located on both sides of the B4098 with the retail and leisure offer interspersed with residential. The centre is occupied primarily by independent businesses but has relatively limited convenience provision for its size. The centre includes a number of larger premises including those occupied by Buzz bingo and Radford Social Club.
- 4.27 **Station Avenue** is a relatively long, linear centre located to the south of the B4101 with a limited retail offer. The centre is developed into two sections by a surface car park and includes a number of larger units occupied by a petrol station, accountants and public house. The retail offer includes a One Stop convenience store and a Nisa within the petrol station, and a pharmacy in the southern part of the centre, but little else.
- 4.28 **Sutton Avenue** is a small purpose built centre located within the residential area it serves. It has a limited offer due to its size and the lack of units in retail use, with just a small convenience store currently trading. Other uses include a laundrette and day nursery.
- 4.29 **Walsgrave Road** is a larger local centre and comprises a traditional linear parade to the south of the A4600 with a more modern, two storey block at the eastern end of the centre, whose occupiers include a range of comparison retailers and a place of worship. The rest of the centre has a range of independent retailers but a relatively limited convenience offer.
- 4.30 **Willenhall** is a purpose built local centre providing a good mix of shops and services for its local catchment. It includes both a frozen food and a convenience store as well as a health centre and community buildings.
- 4.31 **Winsford Avenue** is a purpose built centre located to the east of Whitaker Road comprising a parade of shops and a separate supermarket to the rear. The centre has a good range of comparison shops for its size as well as other convenience provision, an opticians and a number of F&B units. To the west of Whitaker Road but outside of the defined centre, is the Allesley Park Neighbourhood Centre which includes a medical centre, library, pharmacy and Mind centre.

5. RETAIL AND LEISURE CAPACITY ASSESSMENTS

RETAIL CAPACITY

- 5.1 The detailed quantitative retail capacity assessment for Coventry and the centres and retail locations within it is provided in Appendix B of this study.
- 5.2 The assessment is based on the assumption that retail market shares (retained Study Area expenditure) for the City Council area and at a centre level remain constant. In other words, capacity forecasts do not allow for potential changes to shopping patterns from those currently being seen.
- 5.3 Capacity forecasts are provided for the study area overall, and the defined district centres, with the results summarized below. In both cases this makes no allowance for the potential reoccupation of existing vacant floorspace:

Table 5.1 Forecast Capacity for Convenience Floorspace in Coventry (Table B5.12)

TABLE B5.12: SUMMARY TABLE - CONVENIENCE GOODS CAPACITY ASSESSMENT (NET SQ M)

	2028	2033	2038	2041
Coventry City Centre	84	156	211	236
Major District Centre - Arena Park	174	322	446	505
Major District Centre - Brando Road	114	208	286	324
Major District Centre - Cannon Park	178	330	443	494
District Centres	243	480	671	760
Local Centres	-18	183	342	416
Elsewhere in Coventry	1,118	2,054	2,795	3,140
Total Convenience Goods Floorspace	1,894	3,733	5,195	5,876

Note: Assumes Equilibrium at Base Year (2023) and Constant Market Shares

Source: Appendix B, Table B5.12

Table 7.2 Forecast Capacity for Comparison Floorspace in Coventry (Table B8.12)

TABLE B8.12: SUMMARY TABLE - COMPARISON GOODS CAPACITY ASSESSMENT (NET SQ M)

	2028	2033	2038	2041
Coventry City Centre	1,113	2,872	4,198	4,895
Major District Centre - Arena Park	432	1,000	1,441	1,675
Major District Centre - Brandon Road	87	225	337	401
Major District Centre - Cannon Park	86	203	287	330
District Centres	141	371	546	638
Local Centres	-135	2	103	154
Elsewhere in Coventry	1,609	3,738	5,342	6,185
Total Comparison Goods Floorspace	3,333	8,412	12,253	14,279

Note: Assumes Equilibrium at Base Year (2023) and Constant Market Shares

Source: Appendix B, Table B8.12

- 5.4 The assessment shows that in terms of **convenience provision**, the projections suggest that 3,733 sqm net of additional convenience floorspace would be required by 2033, although more than half of this would be outside of the main centres if market shares remain as now.
- 5.5 In terms of **comparison provision** the amount of additional floorspace required is 8,412 sqm, with the main requirements being in the City Centre and outside the defined centres, based on current market shares.
- 5.6 For the reasons set out above we advise that very limited weight should be given to the forecasts beyond the ten-year period to 2033, as these are not necessarily reliable, being generated primarily on the expected growth in spend which may change significantly when Experian revise their forecasts.

- 5.7 However, this assessment is based on market shares at the time of the household survey and therefore makes no allowance for existing retail floorspace that was unoccupied at that time.
- 5.8 As has been shown in the health checks, there is a considerable amount of vacant floorspace currently available within Coventry, particularly within the City Centre where there is over 50,000 sqm of vacant space. Whilst it is accepted that not all of this will be suitable for current retailer requirements, this is more than ten times the amount of space required for additional comparison provision up to 2038.
- 5.9 The other main locations where comparison floorspace is required is Arena Park MDC (1,441 sqm gross by 2038) and 'other' locations outside of the defined centres (5,342 sqm gross). At Arena Park the current level of vacant space is similar to that required (1,200 sqm) and therefore no further development would be expected to be required.
- 5.10 In terms of the need for space in 'other' locations it is important to recognise that the need arising is based on each location maintaining their current market share. With many of the 'other' locations being out of centre, there would clearly be policy benefits if this split were to be changed in the future in favour of the City Centre. Given the latter would appear to have the capacity to accommodate all the forecast quantitative comparison need, we do not consider that further provision is currently required outside of the defined centres.
- 5.11 It also has to be recognised that there is an existing allocation for new retail floorspace at Eastern Green MDC which at present could accommodate much of the identified comparison capacity.
- 5.12 Similarly, in terms of the forecast convenience needs, the requirement by 2038 similar in terms of the total quantum of space required to that currently proposed at Eastern Green and as such, if a large foodstore proposal were to come forward here, this would meet all the required need up to 2038.
- 5.13 In reality however, we would expect that the foodstore provision at Eastern Green is more likely to take the form of a smaller discount operated store, with the remaining capacity likely to be met by the reoccupation of vacant space or convenience store developments across the City. Either option however means that there is no requirement to allocate new sites for retail development, over and above that at Eastern Green. This is not withstanding that there would also remain a qualitative need for local centre provision at Keresley North and South.

COMMERCIAL LEISURE CAPACITY

- 5.14 Forecasting the need for new leisure uses is more problematic than for retailing, as the sector is highly complex and dynamic. The demand for existing and new leisure uses and facilities is particularly sensitive to changes in economic, demographic, lifestyle and fashion trends and those in the business are often unable to look more than a few months ahead.
- 5.15 From a planning policy perspective therefore the key to meeting future, as yet unknown needs, will be the development of policies that can accommodate the changing needs of the sector and can operate in the real world. This includes recognising that for many leisure uses the level for entering a new market will be relatively high and, unlike retail outlets where store size can vary significantly, incremental development is unlikely if only small increases in market growth are identified. For instance, a new cinema or bowling alley will need a certain number of screens or alleys to be commercially viable.
- 5.16 It is also the case that the recent changes to the Use Classes Order mean that the main commercial leisure sector in terms of spend – Food and Beverage encompasses both Class E and Sui Generis uses. As a result, any changing demand for restaurant and café uses is likely to be met by changing uses within the existing or committed town centre floorspace. This trend was already apparent before 2020 with many developments seeking permission for flexible A1/A3 uses but now, given that planning permission is not required to change between these uses.

6. TOWN CENTRE POLICY ADVICE

- 6.1 As previously advised in the Stage 1 report, the town centre related policies within the adopted Development Plan Documents will need to be reviewed and amended based the review of current national policy and guidance and the findings of this study.
- 6.2 Our thoughts on which policies in the adopted Coventry City Local Plan ('the Local Plan') require revision are set out below, together with our recommendations on those changes.
- 6.3 The starting point for this is national planning policy in the form of the NPPF (December 2023) which sets out what planning policies are required to do (NPPF, para 90), namely:
- a) define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;*
 - b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;*
 - c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*
 - d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;*
 - e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and*
 - f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.*
- 6.4 Changes to the 2020 Use Classes Order and the subsequent implications for what changes to uses may require planning permission and which are now considered to be permitted development, also need to be reflected in updated policies.
- 6.5 We would also suggest that any new or amended policies need to be worded in a way that reflects the many uncertainties that are currently being seen in the economy generally and specifically in terms of how this and other factors are affecting our town centres. In order to develop policies that provide the necessary framework to achieve the Council's long term ambitions, land use flexibility will be the key.

POLICY RECOMMENDATIONS – THE RETAIL HIERARCHY

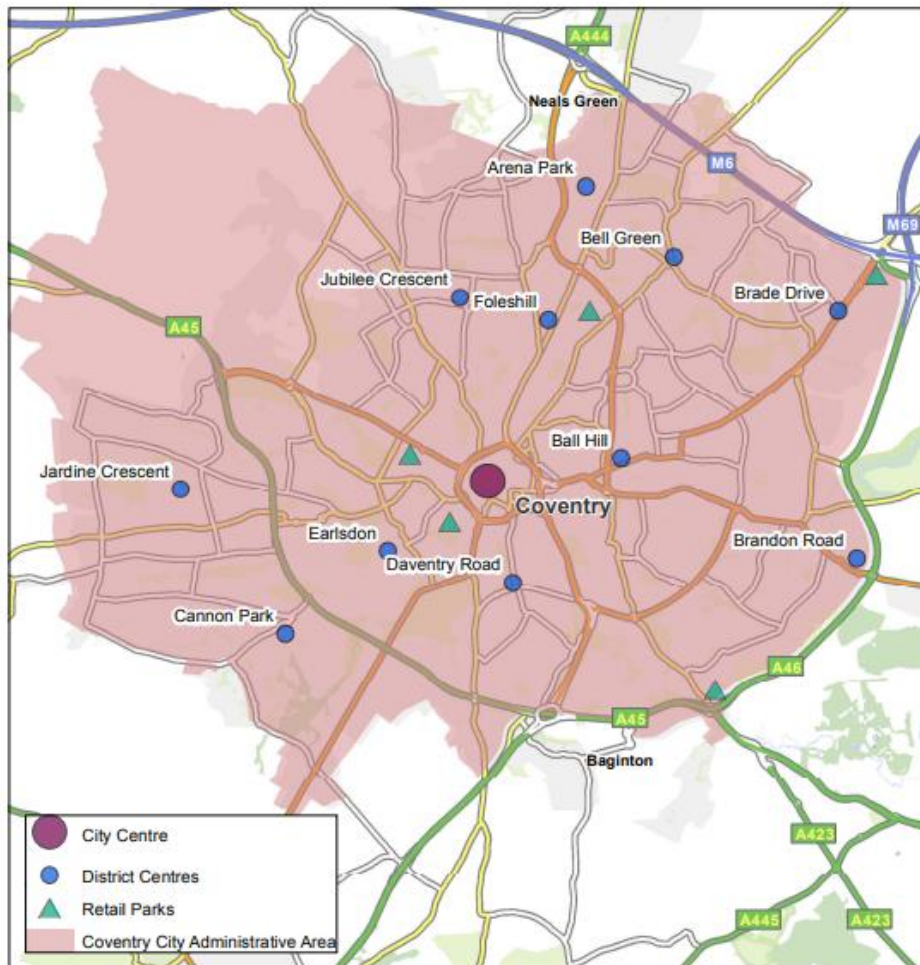
- 6.6 The NPPF requires planning policies to define a network and hierarchy of town centres and promote their long term vitality and viability (NPPF, para 90(a)), by allowing them to grow and diversify in a way that can respond to the rapid changes being seen in the retail and leisure industries.
- 6.7 At the present time Coventry's retail hierarchy is set out in **Policy R3: The Network of Centres**, with the current hierarchy described above.
- 6.8 We have reviewed all the currently defined centres set out in the policy in the light of our findings on the health of the centres and consider that the current hierarchy remains largely appropriate.

- 6.9 At the top of the hierarchy the City Centre is clearly the major centre in the area with an extensive draw. It also provides a diverse retail and leisure offer. It should therefore remain at the top of the retail hierarchy.
- 6.10 The three existing Major District Centres are strategically located to serve relatively large catchments and the presence of large foodstores within them mean that they all justify their current status. However, each provides a slightly different offer and are not directly comparable. Cannon Park is the oldest of the centres and includes a range of smaller retail units more typical of a traditional district centre, whilst the newer centres of Arena Park and Brandon Road include larger retail units. The result is the non-retail offer in both of these centres is more limited and the units appeal to national multiples that may otherwise consider a city centre location. This does not affect their status as MDCs but may be a consideration when considering detailed policy proposals.
- 6.11 The development of a MDC at Eastern Green is considered further below, but the principle of developing a fourth MDC to serve the west of the City remains appropriate.
- 6.12 The district centres generally include a larger number of units than the MDCs but these are generally smaller in size and the retail offer includes a higher proportion of independent businesses. The exception to this is Brade Drive which only includes 7 units as currently defined, with most of the floorspace being in the Asda foodstore and Buzz Bingo. As such it lacks the range of uses typically seen in a district centre. It is also of note that there is significant retail provision to the north of Brade Drive but this is considered to be out of centre.
- 6.13 The key justification for this would seem to be the better accessibility of Brade Drive from the existing residential areas and, given that we consider there is a requirement for a district centre to serve this area, then the designation remains appropriate.
- 6.14 In terms of the local centres this review shows that, whilst there is considerable variation in their size and offer, most appear to be performing well and meeting the needs of their local communities, with vacancies generally being low and most centres providing a reasonable mix of convenience retail, F&B uses and local service uses.
- 6.15 Based on size alone, **Far Gosford Street Local Centre** is of a scale that could warrant its upgrading to a District Centre. However, it appears to have developed a complementary offer to that provided in the City Centre, including a large number of F&B units. As a result, the retail offer is comparatively limited and we consider the centre performs more as a specialist local centre. We therefore recommend no change to its status as a local centre. However, the western boundary of the centre should be reviewed to reflect the recent development.
- 6.16 At the other end of the scale there are a number of very small local centres providing less than 10 units, which could arguably be considered to be local parades being of 'purely neighbourhood significance'. However, a local parade falls outside of the definition of a town centre²¹ and therefore would not be included in any sequential or impact assessment. For this reason we consider that it is preferable for centres which have the potential to serve more than an immediate residential area should retain local centre status.
- 6.17 The exceptions to this are Quorn Way and **Sutton Avenue**. The latter is located within a residential area accessed via minor roads and as such would only be expected to serve a very localised catchment. It is also close to Banner Lane Local Centre, whilst new residential developments in Keresley to the north will be served by their own local centres. This will restrict the draw of Sutton Avenue and therefore, given its very limited retail offer at the present time, we consider that the centre would be more appropriately defined as a local parade.

²¹ NPPF, Annex 2

- 6.18 **Quorn Way** is similarly located away from the main road network but has a slightly more extensive residential area to draw trade from, as well as a marginally stronger retail offer. We therefore consider this should remain as a Local Centre.
- 6.19 The final consideration is whether there are any other groups of retail and service units that are not currently defined as a centre but which should be. This includes smaller groups of shops and services that could be providing a local centre offer and the out of centre retail parks which could provide a similar offer to the district and major district centres.
- 6.20 In order to assess this, the starting point has been to consider the purpose of defining a centre, which is to provide policy support for sustainable locations that provide local communities with access to the retail, leisure and service uses they require. As a result, the distribution of such centres is an important consideration, as is the need to ensure that the network of centres are generally complementary to each other rather than being in competition.
- 6.21 It is also relevant that what constitutes main town centre uses is considerably broader than retail²² and, whilst it is the norm to refer to ‘the retail hierarchy’, in practice any defined centre would normally be expected to provide a range and diversity of main town centre uses. This may vary between locations depending on the catchment being served but we would generally advise against including a retail park or similar within the hierarchy without an appropriate diversity of uses being present.
- 6.22 Should it be considered that a retail park has the potential to develop as a town centre, then the appropriate policy response could be a two stage process where the potential to identify the area as a centre in the future is recognised but subject to the introduction of a suitable mix of other main town centre uses.
- 6.23 However, any such policy or new designation of a centre should not be at the expense of adverse impacts on existing centres and therefore the location and potential catchment of an area will be a key consideration, bearing in mind that the development of main town centre uses within a centre is not subject to either the sequential or impact tests. With limited growth in expenditure and capacity for new floorspace therefore, defining more locations as centres risks adversely impacting existing centres.
- 6.24 With this in mind, the current distribution of the higher order centres in Coventry and main retail parks has been mapped and is shown below and we would comment as follows:
- **Alvis Retail Park** - the Alvis Retail Park is located approximately 660m to the west of the City Centre and currently provides large footprint retail units. Due to its proximity to the City Centre, we do not consider that there is a qualitative need to allocate a new centre in this part of Coventry. Further, doing so, would have the potential to draw trade and new occupiers from the City Centre to this location;
 - **Gallagher Retail Park** – the Gallagher Retail Park is located between the City Centre and Arena Park MDC and provides a similar retail offer to the latter. It is also close to Foleshill District Centre. As such we do not consider that there is a qualitative need to allocate a new centre in this part of Coventry. Further, doing so, would have the potential to draw trade and new occupiers from the City Centre to this location, in a similar way to Arena Park MDC already does. It would also compete directly with Arena Park MDC; and
 - **Orchard Retail Park** – Orchard Retail Park is located on the southern outskirts of the City between Brandon Road MDC and Cannon Park MDC. Access, other than by car is limited and therefore this location would compete directly with the businesses in Brandon Road MDC and to a lesser extent with Cannon Park MDC. There is therefore no requirement for any further centre provision in this area.

²² NPPF, Annex 2



- 6.25 In terms of local centre provision we have reviewed a number of areas with existing retail provision to consider whether any merit allocation as local centres. We consider that Clay Lane should be given further consideration, given its size and current offer.
- 6.26 The following have also been considered but, in our opinion are more appropriately described as local parades ie they are of 'purely local significance':
- Butts Road;
 - Ringwood Highway; and
 - Woodend, Hillmorton Road.
- 6.27 However, Section 2 of the policy will need to be updated to reflect the introduction of the 2020 Use Classes Order. Whilst it is still appropriate to seek a balance between shops and other main town centre uses (Part 2a), the Council's ability to control this is clearly diminished by the introduction of Class E. However, this element of the policy should be retained as an aspiration.
- 6.28 With respect to the rest of Policy R3, Part 2(b) which seeks to maintain a minimum threshold of former Class A uses within the City's network of main centres, this will either need to be removed, or amended to refer to Class E uses. Should the latter approach be adopted, a new % threshold will be needed and a justification for this provided. This in turn would require some analysis of what the current mix is in existing frontages and then an assessment of what potential there is for change.
- 6.29 Part 2(c) remains an appropriate policy, although it must be recognised that some changes of use from retail to residential could be achieved through Permitted Development Rights.
- 6.30 Part 2(d) also remains appropriate.

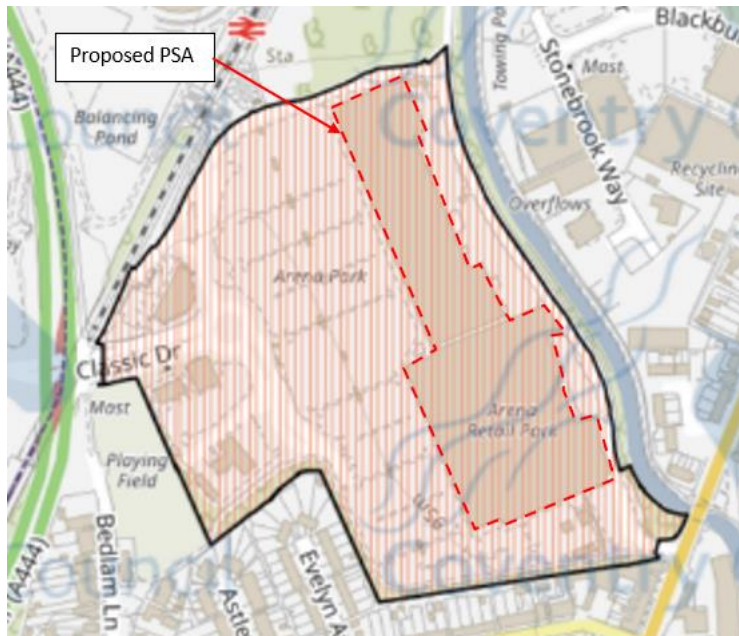
6.31 The role of Coventry City Centre is also supported by **Policy R2: Coventry City Centre – Development Strategy**. The majority of this policy remains appropriate and in accordance with national planning policy guidance. However, Part 2 of the policy will need to be updated to reflect the adopted of a City Centre Action Area Plan in 2017.

POLICY RECOMMENDATIONS - TOWN CENTRE AND PRIMARY SHOPPING AREAS

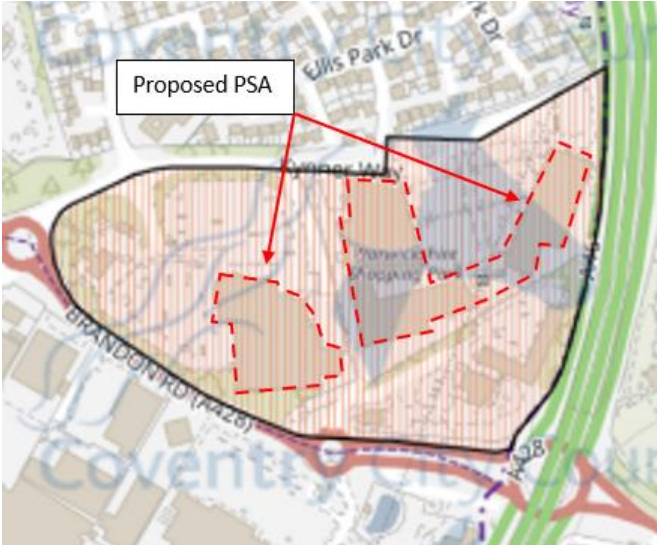
Primary Shopping Areas (PSAs)

- 6.32 Paragraph 90 of the NPPF states that polices should define the extent of town centres and Primary Shopping Areas (PSAs) and to specify the range of uses permitted in such locations as part of a positive strategy for each centre. 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 their 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.
- 6.33 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. Specifically Annex 2 of the NPPF defines edge of centre for retail purposes as “a location that is well connected to, and up to 300 metres from, the primary shopping area”. For all other main town centre uses, a location within 300 metres of a town centre boundary is considered to be edge of centre.
- 6.34 Currently, there is only a defined Primary Shopping Area for Coventry City Centre, which informs AAP Policy CC18 (The Primary Shopping Area). It is recommended that the Council considers defining PSAs for the District Centres as well, with our suggestions set out below.

Arena Park MDC



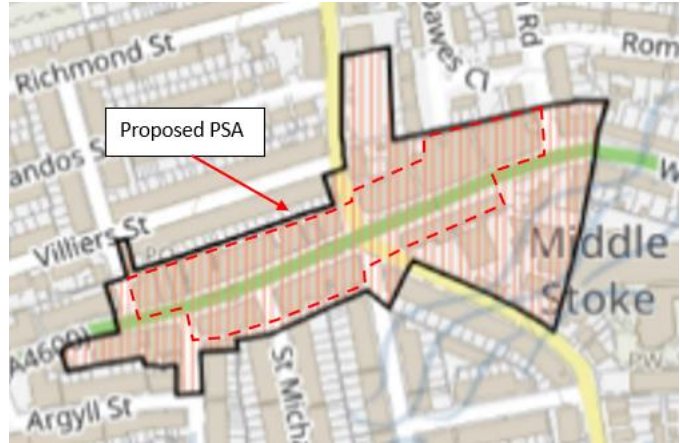
Brandon Road MDC



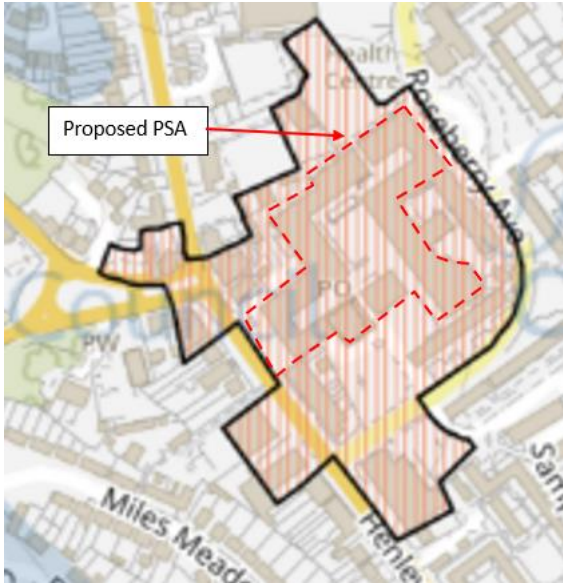
Cannon Park MDC



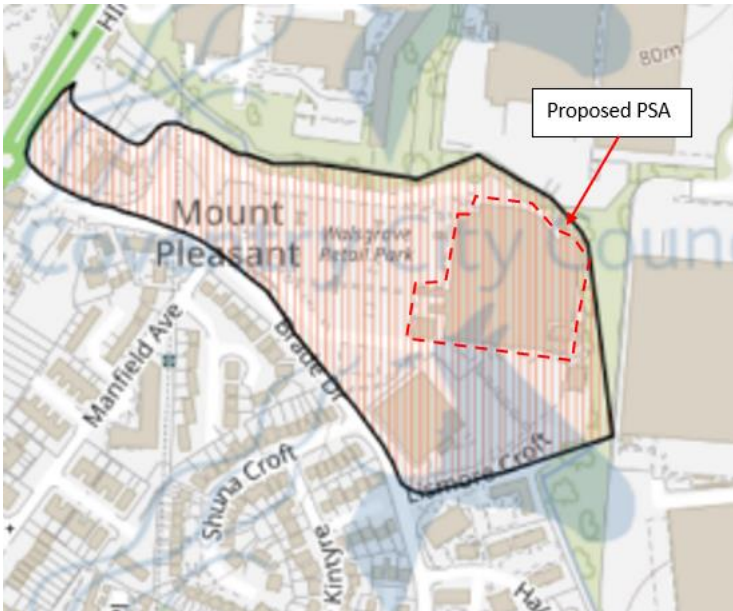
Ball Hill DC



Bell Green DC



Brade Drive DC



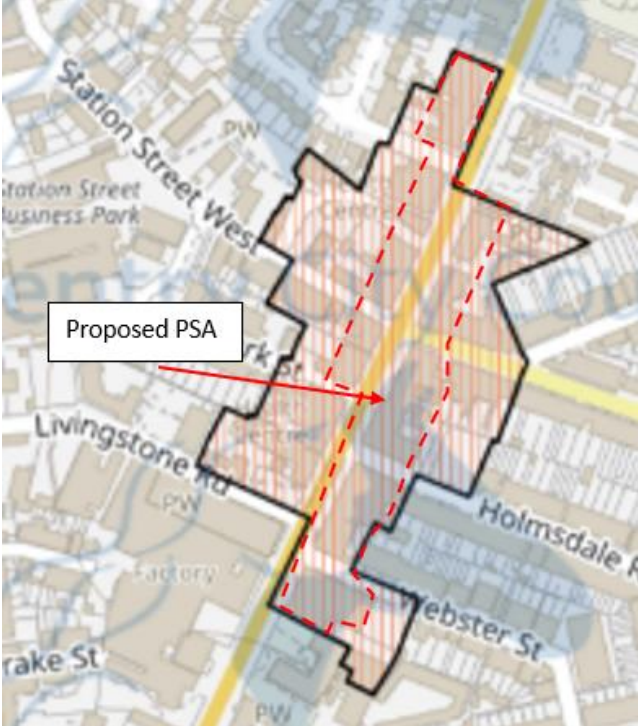
Daventry Road DC



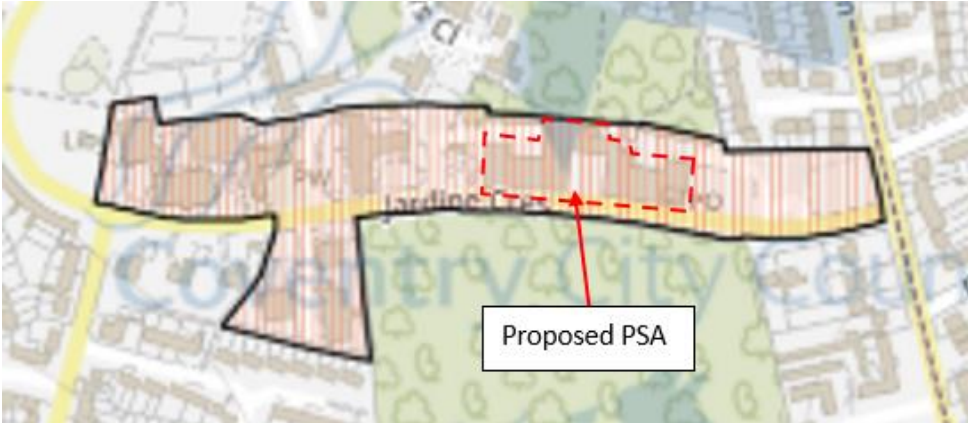
Earlsdon DC



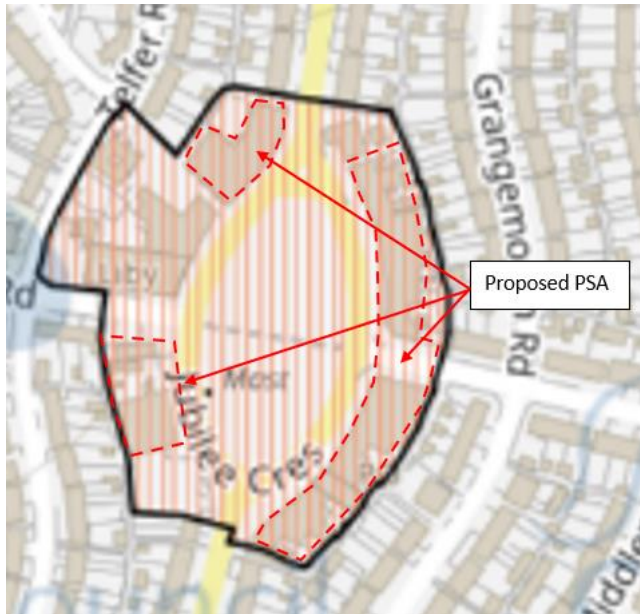
Foleshill DC



Jardine Crescent



Jubilee Crescent



Town Centre Boundaries

- 6.35 In terms of the centre boundaries for defined centres in Coventry these are currently defined on the Policies Map that forms part of the 2017 Local Plan.
- 6.36 In many locations in the UK, the decline in the demand for retail space has led to a need to consider reducing the extent of the defined retail areas and sometimes the town centres as well. However, in Coventry the forecast population growth in the city means some growth in retail expenditure is expected. And some centres are experiencing relatively low levels of vacancy.
- 6.37 However, at the same time the retail capacity assessment has indicated that there is no requirement to allocate new retail sites for development. As a result, we consider that generally the current frontages and centre boundaries will remain appropriate for the new Local Plan.
- 6.38 The only exceptions we have identified are as follows:
- **Ball Hill District Centre** – we would suggest that the garage and employment area east of Brays Lane should be removed from within the district centre boundary, with 146 Walsgrave Road being the easternmost property included on the south side of the road;
 - **Far Gosford Local Centre** – the boundaries to the west should be reviewed to reflect recent development;
 - **Jardine Crescent District Centre** – the area south of Jardine Crescent should be removed from the centre following its redevelopment;
 - **Keresley Road Local Centre** – the centre includes a single unit to the west of the B4078, in a building designed for residential use. The unit is separate from the rest of the centre and we do not consider its continued use for commercial purposes is necessary. As such we would recommend that the boundary for the centre is redrawn to exclude this property;
 - **Winsford Avenue Local Centre** – the Allesley Park Neighbourhood Centre which is currently located outside of the local centre boundary provides a complementary offer to that in the local centre. As such it is likely to form part of the centre from a visitor's perspective and we would recommend amending the centre boundary to include these uses.

POLICY RECOMMENDATIONS – SITE ALLOCATIONS

- 6.39 At the present time, Policy R1 Delivering Retail Growth lists the sites allocated for retail development, based on the floorspace requirements provided at Tables 5.1 - 5.3 of the Local Plan. The Plan assumes that in excess of 20,000 sqm gross of convenience floorspace would be required by 2031 and over 40,000 sqm of comparison space. There was also an identified need for over 20,000 sqm gross of retail warehousing space and a similar amount of other 'retail' uses (Use Classes A2-A5 as was).
- 6.40 The significant changes in the retail sector, including a considerably higher growth in online shopping and changes in forecast spending mean that the need for new convenience and comparison floorspace in Coventry is now significantly reduced, with our assessment suggesting around 3,700 sqm net (5,300 sqm gross) of convenience space will be required by 2033 and 8,400 sqm (10,500 sqm gross) of comparison.
- 6.41 However, this makes no allowance for existing retail space that was unoccupied at the time of the household survey and our study of the existing town centres in Coventry has shown that there is in excess of 50,000 sqm gross of vacant space in the City Centre alone. As such there is no quantitative requirement to allocate new sites for retail development.
- 6.42 However, it also needs to be recognised that there may be qualitative reasons for supporting new retail development, including proposals aimed at improving the current offer through redevelopment and to ensure good accessibility to all residents. This is important in Coventry where population growth is expected. As such we consider it remains appropriate to support retail development in the following locations:
- New Eastern Green Major District Centre
 - New Keresley South Local Centre
 - New Keresley North Local Centre
- 6.43 However, given that the future demand for retail and other town centre uses in these locations is difficult to predict, we would recommend that the policy wording is amended to reduce the quantum of floorspace permitted and allow flexibility of uses.
- 6.44 For the new **Eastern Green Major District Centre**, Policy R1 currently allocates up to 10,000 sqm gross for the MDC, to include approx. 5,000sq.m for a new superstore, 4,000sq.m of predominantly bulky goods retail and up to 1,000sq.m of small scale local provisions.
- 6.45 Given the changes in the retail markets since this policy was adopted and the introduction of Class E, the total allocation is likely to remain appropriate, but a wider mix of retail and other town centre uses should be supported, including an appropriate level of provision of F&B and leisure and service uses to serve the new community. Any development however should only be intended to meet the needs of the local area and should not impact on existing businesses or investment plans in the existing Cannon Park MDC or district and local centres on the western side of Coventry.
- 6.46 The proposed local centres to serve **Keresley North and South**, should continue to be allocated for the development of a range of small scale units aimed at providing a range of local community uses and top up provisions. The previous specified floorspace figures of 1,500 sqm and 1,000 sqm gross remain appropriate for a local centre, provided this is provided in a range of units so that a mix of town centre uses can be provided.
- 6.47 At **Brade Drive District Centre** current policy seeks to increase retail provision by up to 1,000 sqm gross, in small scale units to support local needs and help diversify the centre's current offer.
- 6.48 We consider that the need to diversify the centre's offer remains, as there is currently little to distinguish the area as a district centre from the nearby out of centre provision. However, it is also important to ensure than any new provision contributes to development of the location as a district centre and

therefore the more efficient use of existing land and premises within the defined centre should be encouraged to increase the range of non-food, retail service and leisure uses provided.

- 6.49 In the current Local Plan there is an allocation of 500 sqm gross at **Jardine Crescent District Centre** which it was intended would be provided as part of mixed use schemes within the amended centre boundary. We do not consider that there is any requirement to take forward this allocation within an updated plan.
- 6.50 The second part of Policy R1 also supports the comprehensive redevelopment of the Riley Square element of **Bell Green District Centre** in accordance with an overarching Masterplan for the area. We consider that this should continue to be supported, as, although progress appears to be made in bringing this redevelopment forward, the scheme remains to be implemented. However, the need for the redevelopment remains.
- 6.51 Finally, Part 3 of Policy R1 makes it clear that further retail provision at Arena Park Major District Centre will not be supported during the plan period unless it is demonstrated that it will not have a significant adverse impact on the city centre or is an essential element of supporting the wider parks tourism functions.
- 6.52 We consider that there continues to be a potential threat that retailers seeking representation in Coventry will prefer to occupy space at Arena Park or Brandon Road MDCs in preference to the City Centre and we therefore believe that the current Policy R1(3) should be retained. The Council should also consider extending its coverage to include reference to Brandon Road MDC.
- 6.53 We would also recommend that the policy wording be expanded to include other town centre uses not just retail.

POLICY RECOMMENDATIONS – OTHER POLICY UPDATES

- 6.54 In terms of the existing policies that apply to retail and town centre uses and centres within Coventry, the following require review in the light of the findings of this study and changes to national planning policy and legislation:
- **Policy DS1: Overall Development Needs** – this will need to be updated to reflect the revised retail capacity assessment;
 - **Policy R4: Out of Centre Proposals** – we would recommend that this policy is updated to include a reference to the need to consider the impact of a proposal on town centre investment, in accordance with the NPPF. In addition, as previously advised, for the policy to align with the NPPF, the wording 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 ties in with the recommendation to adopt PSAs for the City's district centres.
 - **Policy R5: Retail Frontages and Ground Floor Units in defined centres** – this will need to be updated to refer to Class E, with the Council recognising that this will permit a wider range of uses than anticipated when the Local Plan was adopted.
 - **Policy R6: Restaurants, Bars and Hot Food Takeaways** – given that restaurants are a Class E use, we would recommend that the reference to this use is removed from the policy. The rest of the policy remains valid in the context of both bars and hot food takeaways being Sui Generis uses. However, it is noted that much of the detail regarding the development of hot food takeaways is provided in the Council's Supplementary Planning Document on the matter. A review of this document is outside of the scope of the current brief, but it is recommended that such a review is undertaken, given the changes that have been seen in the sector since the pandemic. This includes greater takeaway and delivery services being

provided by restaurants and the emergence of dark kitchens. As a result, it would be sensible to review the SPD to ensure it can still provide the necessary controls to new development.

We would also recommend that consideration is given to whether the development of hot food takeaways or similar could be controlled by planning conditions restricting the hours of opening as an alternative or in conjunction with the current proposals to identify zones where such development will not be permitted.

Other Matters For Consideration

- 6.55 Our study and review of recent and on-going trends that may affect Coventry's centres has also identified a number of other topics where the Council may consider further investigation is warranted, or which could be the subject of new policies in the emerging local plan, in order to promote positive changes.

Local Impact Thresholds

- 6.56 Paragraphs 91 - 94 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.
- 6.57 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.
- 6.58 We therefore recommend that the following local floorspace threshold be adopted for Coventry City Centre, Major District Centres, and District Centres:
- 1,000 sqm gross for schemes expected to impact on, or have the potential to impact on Coventry City Centre;
 - 500 sqm gross for schemes expected to impact on, or have the potential to impact on the Major District Centres; and
 - 250 sqm gross for schemes expected to impact on, or have the potential to impact on the District Centres.

- 6.59 This is based on the current retail offer and size of units within the existing centres, with the threshold set at a level reflecting the offer in the smallest / most vulnerable of the centres. For the MDC this has therefore reflects the likely need to assess impacts affecting Cannon Park, whilst for the District Centres it is noted that in many the average size of retail units is around 100 sqm and the loss of more than 1 or 2 of these as a result of competition from out of centre retail development could adversely impact on the overall health and vitality of that centre.

- 6.60 However, it should be acknowledged in policy that any impact assessment required by policy should be proportionate to the scale of development being proposed.

Local Parades

- 6.61 This study and the current retail hierarchy for Coventry identifies four levels/tiers of centres, ranging from the City Centre down to Local Centres. This is consistent with the NPPF. Below this are the small

parades of shops and standalone corner shops which are present across the City and which provide an important offer within their local catchment.

- 6.62 The NPPF is clear that local parade and standalone shops of this type which are of purely neighbourhood significance, do not constitute town centres for the purposes of national retail policy (NPPF, Annex 2). As a result, the policies in the current Local Plan and discussed here do not apply to such locations.
- 6.63 However, the shops and services provided in such locations can be very important to their local communities and we consider that the inclusion of a policy which recognises the role of such facilities and seeks to encourage their retention/development would be appropriate in the new Local Plan.
- 6.64 We would suggest that this could take the form of a policy which seeks to retain such uses where alternative provision is not easily accessible for residents when walking and supports their provision in locations not currently benefitting from such provision.
- 6.65 However, to ensure that local provision does not adversely impact on or compete with centres within the retail hierarchy, it may be necessary to restrict the size of unit(s) to which this policy support would apply. It may also be necessary to indicate for any new developments approved on this basis, planning conditions are likely to be required to ensure that the types of uses that can be provided in the long term remain appropriate to meet neighbourhood needs.

Markets

- 6.66 The Council may wish to include a policy supporting the retention and enhancement of existing markets and the introduction of new markets where appropriate, in accordance with the NPPF.

Flexible and Mixed Uses

- 6.67 The changes to the Use Classes Order in 2020 has already introduced the more flexible Class E use which means many town centre uses are now considered to be in the same use class as retail, allowing the flexible use of premises without the need for planning permission. However, as technological changes mean new uses, products and markets may emerge during the plan period, further flexibility in the Council's approach to land use may be required, either to accommodate new retail or service markets or the multi-use of a single premises.
- 6.68 This could be especially important for new and developing businesses.
- 6.69 The positive or negative effects that new proposals may have on footfall at different times of day may be one measure that can assist the Council in assessing the effects of such changes and the extent to which they support or enhance a centre's offer.

POLICY RECOMMENDATIONS – COVENTRY CITY CENTRE AAP

- 6.70 As set out in the Stage 1 report, there will also be a need to update the policies and supporting text in the City Centre AAP to reflect the proposed changes to the local plan policies and other updates identified in this report. This will be necessary however the policies are presented ie as part of the Local Plan or in a masterplan or similar.
- 6.71 The changes will need to amend the current references to floorspace requirements and/or the Use Classes Order in the following:
- Policy CC12 (The Business Area – Friargate);
 - Policy CC13 Cathedrals and Cultural Area;
 - Policy CC14 The Civic Area;
 - Policy CC15 Far Gosford Street;
 - Policy CC17 Spon Street;

- Policy CC18 ('The Primary Shopping Area');
- Policy CC19 (Primary Shopping Area regeneration – South); and
- Policy CC20 (Primary Shopping Area regeneration – North).

MONITORING

- 6.72 The Council will need to measure the performance of the updated Local Plan once adopted, to assess how effectively it is delivering the vision and objectives set out in the plan. This will normally be done through the Council's Annual Monitoring Report which has implications for what can appropriately and effectively be monitored.
- 6.73 For retail and town centre uses many of the changes that are likely to be seen in the City's town centres and local parades will occur outside of the planning system, either through operator changes or permitted development. It is also the case that planning policy can only encourage development rather than ensure it is undertaken.
- 6.74 For these reasons we consider that the key points that will indicate the success or otherwise of planning policies in delivering the Local Plan vision and objectives, will be to consider the distribution of approved floorspace for retail and town centre uses. This should consider the type of development proposed and the amount of floorspace approved in terms of how much is located in the City Centre, the Major District Centres, District Centres, local centres and parades and out of centre.
- 6.75 This is important in assessing the extent to which the City Centre, as the preferred location for development is securing new investment, as well as determining the proportion of in-centre and out of centre space approved.
- 6.76 In applying this measure however, it is important to note that national planning policy recognises that out of centre development may be appropriate subject to demonstrating compliance with the sequential test. It may therefore be helpful to have a second monitoring measure that looks at how any approved scheme outside of a centre has demonstrated this compliance. This could consider the proximity of the application site to the nearest centre and whether there are any locationally specific requirements to be considered.
- 6.77 The Council may also wish to investigate ways of measuring the changing vitality of Coventry's centres, with footfall likely to be the most straightforward measure to consider.

POLICY SUMMARY

- 6.78 The proposed changes to existing local plan policies for retail and town centres discussed above, are summarised below:

Existing Local Plan Policy	Proposed Changes																								
<p>Policy R1 Delivering Retail Growth</p> <p>1. The following sites/areas are allocated to support the provision of retail floor space across Coventry. These schemes are to be delivered in accordance with the specifications in this policy and other policies within this plan and the City Centre AAP as appropriate.</p> <table border="1" data-bbox="264 517 946 1070"> <thead> <tr> <th>Site</th> <th>Proposed floor space (sq.m gross)</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>City centre</td> <td>At least 70,100</td> <td>A1-A5 uses of varying size (including bulky goods retail where appropriate) to be delivered through the Area Action Plan at City Centre South, City Centre North, Friargate, City Centre Supermarket and wider support for the creation of active frontages within the wider city centre. Also includes allowance for city centre vacant units.</td> </tr> <tr> <td>New Eastern Green Major District Centre</td> <td>Up to 10,000</td> <td>To include approx. 5,000sq.m for a new superstore, 4,000sq.m of predominantly bulky goods retail and up to 1,000sq.m of small scale local provisions.</td> </tr> <tr> <td>Cannon Park Major District Centre*</td> <td>6,200</td> <td>New A1 elements of the scheme should be restricted to convenience and bulky goods retail. Non A1 uses will be supported to encourage diversification of the centre, especially around A2-A5 uses.</td> </tr> <tr> <td>New Keresley Local Centre south</td> <td>1,500</td> <td>Local centre to include a range of small scale units providing a range of local community uses and top up provisions.</td> </tr> <tr> <td>New Keresley Local Centre north</td> <td>1,000</td> <td>Local centre to include a range of small scale units providing a range of community uses and top up provisions.</td> </tr> <tr> <td>Brade Drive District Centre</td> <td>1,000</td> <td>New retail floor space should be focused around new A1-A5 uses and other non-retail uses. This should be delivered in small scale units to support local needs and help diversify the centre's current offer.</td> </tr> <tr> <td>Jardine Crescent District Centre</td> <td>500</td> <td>New floor space to be provided as part of mixed use schemes within amended centre boundary A1-A5 uses to be provided, which reflect the existing character of the centre.</td> </tr> </tbody> </table>	Site	Proposed floor space (sq.m gross)	Details	City centre	At least 70,100	A1-A5 uses of varying size (including bulky goods retail where appropriate) to be delivered through the Area Action Plan at City Centre South, City Centre North, Friargate, City Centre Supermarket and wider support for the creation of active frontages within the wider city centre. Also includes allowance for city centre vacant units.	New Eastern Green Major District Centre	Up to 10,000	To include approx. 5,000sq.m for a new superstore, 4,000sq.m of predominantly bulky goods retail and up to 1,000sq.m of small scale local provisions.	Cannon Park Major District Centre*	6,200	New A1 elements of the scheme should be restricted to convenience and bulky goods retail. Non A1 uses will be supported to encourage diversification of the centre, especially around A2-A5 uses.	New Keresley Local Centre south	1,500	Local centre to include a range of small scale units providing a range of local community uses and top up provisions.	New Keresley Local Centre north	1,000	Local centre to include a range of small scale units providing a range of community uses and top up provisions.	Brade Drive District Centre	1,000	New retail floor space should be focused around new A1-A5 uses and other non-retail uses. This should be delivered in small scale units to support local needs and help diversify the centre's current offer.	Jardine Crescent District Centre	500	New floor space to be provided as part of mixed use schemes within amended centre boundary A1-A5 uses to be provided, which reflect the existing character of the centre.	<p>The City Centre allocations are no longer required to meet any quantitative need for convenience or comparison floorspace. However, qualitative needs are likely to remain particularly in the context of regeneration proposals.</p> <p>The Eastern Green allocation should be updated to allow more flexibility in the end uses, to include appropriate provision of retail and leisure uses.</p> <p>There is no quantitative requirement for further retail development at Cannon Park, Brade Drive DC or Jardine Crescent DC. These allocations are therefore no longer required.</p> <p>Allocations at the new Local Centres at Keresley North and Keresley South could be updated to remove the floorspace amount or express it as a maximum. Some guidance on the size of units should also be included.</p>
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<p>2. The comprehensive redevelopment of the Riley Square element of Bell Green District Centre will be supported in accordance with an overarching Masterplan for the area.</p>	<p>No change</p>																								
<p>3. Further retail provision at Arena Park Major District Centre will not be supported during the plan period unless it is demonstrated that it will not have a significant adverse impact on the city centre or is an essential element of supporting the wider parks tourism functions.</p>	<p>The reference to 'retail' should be expanded to include leisure and other town centre uses.</p> <p>Consideration should be given to extending the reference to Arena Park MDC to also include Brandon Road MDC.</p>																								
<p>Policy R2: Coventry City Centre – Development Strategy</p> <p>1. The city centre will continue to be developed and regenerated to ensure it is a truly world class city centre, leading in design, sustainability and culture. This will be achieved by:</p>	<p>No change to Part 1.</p> <p>Part 2 to be removed/updated as appropriate.</p>																								

<p>a. Enhancement of its position as a focus for the entire sub-region and as a national and international destination to live, work and play;</p> <p>b. Enhancement of its retail and leisure offer to strengthen the city's sub-regional role;</p> <p>c. Provision of high quality office space;</p> <p>d. Becoming a hub for education;</p> <p>e. Including a variety of places to live which cater for different needs;</p> <p>f. Preserving or enhancing the character and setting of the historic built landscape and the archaeological environment;</p> <p>g. A connected public realm including public squares and green spaces, easily accessible through the creation of desirable and legible pedestrian routes;</p> <p>h. Accessible for all;</p> <p>i. Providing an attractive and safe environment for pedestrians, cyclists and motorists;</p> <p>j. Provide a high quality public transport system that benefits from seamless integration and is well connected to existing and new infrastructure;</p> <p>k. High quality sustainable built design;</p> <p>l. Continuing to develop a vibrant and attractive night time economy;</p> <p>m. Providing opportunities to improve health and wellbeing;</p> <p>n. Continuing to support greater integration of the university within the wider city centre in accordance with the policies in the Area Action Plan;</p> <p>o. Recognising and preserving key views to the iconic three spires of St Michaels, Holy Trinity and Christchurch;</p> <p>p. Supporting the reintroduction of green and blue infrastructure throughout the city centre, including opportunities for deculverting wherever possible.</p> <p>2. An Area Action Plan will be developed to help deliver this strategy and support and guide development within the city centre.</p>	
<p>Policy R3: The Network of Centres</p> <p>1. To support the city centre, the Council will designate, enhance, maintain and protect a network of Centres consisting of Major District Centres, District Centres and Local Centres. These Centres will be the preferred locations for new shops, and other Main Town Centre and community facility uses which do not serve a city-wide catchment.</p>	<p>No change.</p>

<p>2. In all these Centres:</p> <p>a. A balance will be sought between shops (Class A1), and other Main Town Centre and community uses in order to protect the vitality and viability of the centre as a whole;</p> <p>b. Proposals that reduce the concentration of A-class uses within a centre below 51% will not be approved;</p> <p>c. A residential element will be promoted and encouraged, subject to the creation of a satisfactory residential environment and so long as it does not undermine the functionality of the centre;</p> <p>d. Improvement to the environment and accessibility will be promoted and encouraged.</p>	<p>Reference to Class A1 at (a) should be removed.</p> <p>Part (b) should be removed or updated to refer to Class E with a new threshold value.</p> <p>No change to (c) or (d).</p>
<p>3. Major District Centres are shown on the Policies Map at:</p> <p>a. Arena Park;</p> <p>b. Cannon Park;</p> <p>c. Brandon Road;</p> <p>d. Eastern Green.</p> <p>They will complement but not compete with the city centre and will contain a scale of development which is demonstrated to not impact negatively on the city centre and supports the needs of their part of the city for:</p> <p>e. a mix of bulk convenience and comparison shopping as well as service and catering uses;</p> <p>f. social, community and leisure uses including hotels;</p> <p>g. offices.</p>	<p>Final part of the policy referencing the types of development that can be accommodated within the MDCs should be removed to allow flexibility of uses which support the needs of their part of the city.</p>
<p>4. District Centres are shown on the Policies Map at:</p> <p>a. Ball Hill;</p> <p>b. Bell Green;</p> <p>c. Brade Drive;</p> <p>d. Daventry Road;</p> <p>e. Earlsdon;</p> <p>f. Foleshill;</p> <p>g. Jardine Crescent;</p> <p>h. Jubilee Crescent.</p> <p>They will contain a scale of development which is demonstrated to not impact negatively on higher order centres and supports the needs of their district of the city for bulk convenience shopping as well as an element of comparison shopping, service and catering uses. Social,</p>	<p>No change.</p>

community, leisure and small scale office uses will also be acceptable.	
<p>5. Local Centres are shown on the Policies Map at:</p> <ul style="list-style-type: none"> a. Acorn Street; b. Ansty Road; c. Baginton Road; d. Bannerbrook; e. Barkers Butts Lane; f. Binley Road; g. Birmingham Road; h. Broad Park Road; i. Charter Avenue; j. Far Gosford Street; k. Green Lane; l. Hillfields; m. Holbrook Lane; n. Holyhead Road; o. Keresley North; p. Keresley Road; q. Keresley South; r. Longford; s. Quorn Way; t. Radford Road; u. Station Avenue; v. Sutton Avenue; w. Walsgrave Road; x. Willenhall; y. Winsford Avenue. <p>They will contain an appropriate scale of development which is demonstrated to not impact negatively on higher order centres and supports their immediate locality for day-to-day convenience shopping and also some service and restaurant uses; and social, community and leisure uses. Small scale office uses will also be acceptable.</p>	No change.
<p>Policy R4: Out of Centre Proposals</p> <p>1. Proposals for retail and other Main Town Centre uses (including proposals for the expansion or re-configuration of</p>	No change

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

<p>c. the number and proximity of other units occupied by 'A' class uses;</p> <p>d. compatibility of the proposal with nearby uses.</p>	
<p>Policy R6 Restaurants, Bars and Hot Food Takeaways</p> <p>1. Outlets should be located within defined centres and will normally be discouraged outside those locations.</p> <p>2. Proposals within defined centres will be permitted provided they:</p> <p>a. would not result in significant harm to the amenity of nearby residents or highway safety;</p> <p>b. would not result in harmful cumulative impacts due to the existence of any existing or consented proposed outlet;</p> <p>c. are in accordance with the emerging Hot Food Takeaway Supplementary Planning Document (in particular, proposals for A5 uses); and</p> <p>d. are compatible with other Plan Policies.</p>	<p>Reference to restaurants needs to be removed.</p> <p>Paragraph 1(c) needs to be updated to remove the reference to A5 uses and reference the adopted SPD.</p>
<p>Policies Map</p>	<p>Policies map needs to be updated to reflect introduction of PSAs for all Major and District Centres.</p> <p>Town centre boundaries need to be updated to reflect proposed changes.</p>
<p>New Policy – Local Parades/Stores</p>	<p>Suggest a new policy is included to support and protect local shopping parades and stores.</p>
<p>New Policy – Markets</p>	<p>Suggest a new policy is included to support and protect markets.</p>

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