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8 December 2025

Mr Adrian Noon
Planning Officer – Area lead North/East
West Devon Borough Council

By email only: adrian.noon@swdevon.gov.uk

Our Ref:
Your Ref:
File Ref:

Dear Adrian

APPRAISAL OF PROPOSED LIDL FOODSTORE, OKEHAMPTON (PLANNING REF: 2354/25/FUL) – STAGE 1 APPRAISAL

Thank you for appointing Lambert Smith Hampton ('LSH') to provide West Devon Borough Council with retail planning policy advice in relation to the recent application for a Lidl store at Exeter Road, Stockley, Okehampton (Application Ref: 2354/25/FUL).

The purpose of this letter is to provide our initial comments on the sequential and impact assessments provided in the Planning & Retail Statement (PRS) by Carney Sweeney (CS) that accompanies the Lidl application and, in the first instance, to identify whether the information submitted is robust and adequate to demonstrate compliance with the retail and town centre planning policies set out in local and national planning policy.

Our appraisal of the application has been carried out in accordance with Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, which require planning applications to be determined in accordance with the statutory development plan, unless material considerations indicate otherwise.

Our comments therefore concentrate on the retail and town centre policies that are material to the determination of the application. Any failure to reference a specific part of the application submission should not therefore be construed as meaning that we agree with what has been said. Rather, it simply means that we do not consider the statement or assumption to be directly relevant to the key advice we are providing.

Similarly, it should be noted at the outset that the scope of our advice does not cover other planning issues that may be material to the Council's assessment and determination of this application.

The Development Proposal

The planning application by Lidl is seeking permission for the development of a 2,184 sqm gross, 1,529 sqm net foodstore which is intended to be occupied by the applicant (PRS, paras 2.3.2 & 2.33). The application also includes a total of 121 car parking spaces.

It is expected that approximately 80% of the floorspace will be devoted to the sale of convenience goods – 1,223 sqm and 306 sqm (20%) to the sale of comparison goods (PRS, Table 9).

The proposed store would replace the existing Lidl in Okehampton Town Centre which provides 1,000 sqm net of sales area, with an assumed 80% of floorspace devoted to convenience sales (800 sqm) and 200 sqm to comparison sales (PRS, Table 9). The proposal therefore represents an uplift in the net sales area of 53%, with no change to the expected convenience:comparison split.

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However, it is important to note that the description of development for the proposal is seeking permission for a Class E foodstore (PRS, para 2.3.1), rather than specifically for a Lidl store or one operated by a Limited Assortment Discounter (LAD). As such, whilst the information provided regarding the Lidl Operating Model has been noted (PRS, paras 2.3.17 – 2.3.24), it is important that the proposal is assessed in accordance with the proposed Class E use, with consideration given to suggested operator-specific characteristics only to the extent that they could be the subject of a planning condition (if considered necessary).

In terms of its location, the application site is located to the north of the B3260 Exeter Road at Stockley, on the eastern edge of Okehampton (PRS, para 2.1.2). It is also close to the A30 Okehampton Bypass (PRS, para 2.1.6).

It is not within or on the edge of a defined town centre and as such is considered to be out of centre in retail planning terms. In contrast the existing store is located within the Primary Shopping Area and Frontages of Okehampton Town Centre.

Retail and Town Centre Planning Policy

A review of national and local planning policy is provided in Section 3 of the PRS. The development plan is the Plymouth & South West Devon Joint Local Plan (March 2019) (JLP) (PRS, para 3.2.1), with the key retail and town centre policies identified as:

- JLP Policy SPT6 which requires full regard to be given to the sequential hierarchy of centres. The associated Figure 3.8 identifies Okehampton as a Town Centre, along with Dartmouth Ivybridge, Kingsbridge, Tavistock and Totnes. Bere Alston Dartington Hatherleigh, Modbury North Tawton Salcombe and Yealmpton are identified as Local Centres; and
- JLP Policy DEV16 which sets out how applications for main town centre uses in edge and out of centre locations will be assessed, including requiring a sequential assessment for all such proposals and an impact assessment for any retail development creating more than 250 sqm of floorspace in the Thriving Towns and Villages Policy Area which includes Okehampton.

The PRS also references JLP Policy SPT5 which supports retail proposals which meet a qualitative need (PRS, para 3.2.3). However, we do not consider that this policy is relevant to the current application proposal, as the detailed wording of the policy and supporting text makes it clear that it is intended to apply to proposals where small scale local convenience provision would be appropriate, not to larger, out of centre foodstores.

We also consider that Policy JLP DEV17 is not directly relevant in that it relates to supporting the economy of town centres. The current application is for an out of centre site and the policy therefore does not apply, although the closure of the existing Lidl store would be contrary to it.

Material considerations are indicated as including the National Planning Policy Framework (NPPF) (PRS, paras 3.3.4 – 3.3.12).

We also consider that the Planning Practice Guidance (PPG) which accompanies the NPPF is a material consideration, as is the Council's 2017 Retail and Leisure Study (RLS), although the latter is now dated.

<u>Conclusions on Retail Policy</u>

The review of retail and town centre planning confirms that the current application needs to demonstrate compliance with both the national and local policies relating to the sequential and impact tests. These are considered in Section 3 of the PRS and our review of the CS assessments is provided below.

Sequential Assessment

The sequential assessment for the proposed foodstore is provided in paras 4.4.1 – 4.2.16 of the PRS and various sites in Okehampton are identified.

Approach to the Sequential Test

Our key concern regarding the approach adopted by CS in undertaking the sequential assessment relates to a lack of clarity in terms of the flexibility demonstrated when assessing possible sequential sites. Whilst the need for such flexibility is clearly noted (PRS, paras 4.2.2 & 4.2.4), the site parameters set out (PRS, para 4.2.5) are clearly stated as being the 'optimum' for a LAD. Not only is this demonstrating no flexibility in terms of what might be acceptable, but it suggests more restrictive parameters than might be required for other Class E retail foodstores, which is what planning permission is actually being sought for. In particular, we consider the requirement for main road visibility is not essential, as is clearly demonstrated by the popularity of the existing Okehampton supermarkets. Also, whilst access to parking is a reasonable requirement, this need not be provided on site if adequate parking is available on an adjacent site.

Potential Sequential Site Search

In terms of the areas of search and specific sites identified, we would agree with CS that the appropriate area of search is Okehampton, but we consider that insufficient information has been presented on specific sites to allow us to be confident that they are not suitable and/or available for the proposed development, if appropriate flexibility is demonstrated. We therefore consider that further information is required as follows:

- **Town Centre** – there is no consideration given in the sequential site assessment to the existing Lidl site and whether there is any potential to expand the offer on site or through the use of an adjoining site, although we note that it is suggested that this is not possible later in the report (PRS, para 4.4.7). We appreciate this may not result in a store that would meet Lidl's ideal requirements, but this is clearly the preferred location from a 'town centre first' perspective and further explanation of the reasons why the existing store cannot be improved;
- **60-62 North Road** – we consider that further consideration needs to be given to this site, given it appears to have been dismissed primarily on the basis that leasehold is not Lidl's preferred ownership type. Our understanding is that the largest unit on the site and the one with road frontage is still available and currently provides over 2,200 sqm gross of floorspace. There is also a yard to the rear; and
- **Former Devonshire Desserts Factory** – this site has the potential to meet the Lidl's preference for a main road frontage, is being offered for sale and is of more than sufficient size to accommodate the proposed development. As such we think further consideration should be given to the site, including the potential for its redevelopment for a mixed retail and employment use scheme or the partial development of the site.

Until this additional information is received, we do not consider that full compliance with the sequential test has been demonstrated.

Impact Assessment

Having reviewed the impact assessment provided by CS we have concluded that it is not currently robust and fails to properly assess the likely impact of the development proposal on Okehampton Town Centre. Our reasons for reaching this conclusion are set out below:

- The household survey that informs the 2017 South Hams and West Dorset Retail and Leisure Study (RLS) is not considered to reliable now, given that the survey itself was undertaken in 2011 (RLS, para 6.4.8);
- The expected turnover of the proposed store is significantly understated, with it suggested that it will actually have a lower convenience turnover than the existing store. In 2029 the existing

store is forecast to generate sales of £11.83m (PRS, Table 8) but the impact assessment assumes the new store would only achieve sales of £10.49m (PRS, Table 9). This is not realistic (PRS, para 4.4.31), as there would be no incentive for Lidl to invest in a new development if that were the case;

- Also, whilst Table 9 suggests a potential uplift in convenience sales of £3.63m, Table 10 only considers where £0.3m of this additional trade may come from;
- The expected trade draw is unrealistic in that a new, modern store on the outskirts of Okehampton is likely to attract a considerable amount of trade from the Co-op and Waitrose in the town centre, especially from shoppers coming from areas to the east of the town or with good access to the A30. As a result we would expect more trade to be drawn from the town centre stores. We do however consider it unrealistic to assume that all the trade from the existing Lidl store would transfer (PRS, para 4.4.30), as accessibility for shoppers without access to a car will be reduced;
- The assessment of the health of Okehampton Town Centre is too limited, being based on unit numbers alone. In practice, and as set out in the RLS (Appendix H), convenience retailing is a very important part of the town centre offer when considered in terms of floorspace. This is contrary to what is suggested in the PRS (Para 4.4.7);
- Also, whilst the existing Lidl may not meet current company standards, it is clearly a very popular and successful store and contributes to the vitality and viability of the centre. As such it is also important to consider what the closure will mean in terms of the loss of linked trips (PRS, para 4.4.32). It is not sufficient just to dismiss this potential impact on the basis of a lack of evidence. Even if specific data relating to Okehampton is not available, there is general information available from previous studies on the propensity for linked trips and the number could be estimated;
- Given the new store would be expected to achieve a higher turnover than the existing, the potential impact on other defined centres in the catchment should be considered, particularly North Tawton and Hatherleigh; and
- The assessment of the impact of the proposal on existing, committed and planned investment (PRS, para 4.3.1) has adopted too narrow an interpretation of what might constitute investment, limiting it to a consideration of retail proposals. Consideration also needs to be given to what effect the reduction in footfall within the town centre could have on all aspects of investment in there.

In terms of the methodology adopted in undertaking the impact assessment, this is generally in accordance with standard practice, but given our comments above, we have not sought to check the figures in detail at this stage. We would however note the following that need to be addressed/corrected in any future submissions:

- The population figures in Table 1 need checking as we have identified an error in the ‘totals’; and
- It would be helpful if the base convenience and comparison spend figures were provided (Tables 2 and 3).

Conclusions

The planning application by Lidl is seeking permission for the development of a 2,184 sqm gross, 1,529 sqm net foodstore which is intended to be occupied by the applicant and which would replace their existing store in the Okehampton Town Centre.

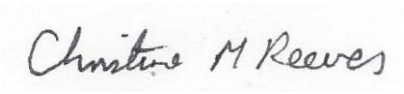
As the application site is in an out-of-centre location, the accompanying PRS provides both sequential and impact assessments in accordance with the requirements of national and local planning policy.

However, our review of these assessments has identified a number of issues with both. Specifically:

- The sequential assessment of sites does not appear to have shown sufficient flexibility and further information is required on a number of potentially suitable and available sites. The applicant also needs to provide information on why the existing store could not be improved as an alternative to relocation; and
- The impact assessment that has been provided cannot be relied upon for various reasons, most significantly:
    - the age of the household survey on which it is based;
    - the convenience turnover of the proposed store being too low;
    - the trade draw of the proposal has not been properly considered; and
    - an inaccurate assessment of the importance of convenience retailing to Okehampton Town Centre has been made.

As a result the applicant has failed to demonstrate the necessary compliance with retail and town centre planning policies. We would therefore recommend that the applicant is invited to submit updated sequential and impact assessments to address the points raised in this advice

Yours sincerely



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