

Hall Lane Car Park, Telegraph Way, Kirkby, L32 8RJ

Planning Statement (including Statement of Community Involvement and
Economic Statement) for
Lidl Great Britain Limited

November 2025
Our Ref: 25-00258



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Quality Assurance

This report has been prepared within the quality system operated at Rapleys LLP according to British Standard ISO 9001:2015.

We confirm that the undersigned is an appropriately qualified and experienced Chartered Planner experienced in the commercial property sector.

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1 INTRODUCTION

- 1.1 This Planning Statement (PS) has been prepared by Rapleys LLP ('Rapleys'), on behalf of Lidl Great Britain Limited ('Lidl') and is submitted in support of a planning application for the erection of two retail units (Use Class E) with access, parking, landscaping and other associated works at a site comprising Hall Lane Car Park, which is located off Telegraph Way in Kirkby Town Centre.
- 1.2 The PS addresses relevant planning and retail issues affecting the site through the consideration and assessment of the proposal against key national and local planning policies and other material considerations. It also provides evidence of the unique nature of the Lidl discount operation and its complementary role to mainstream convenience retailers, by identifying relevant appeal decisions where this has been demonstrated.
- 1.3 The PS should be read in conjunction with the following accompanying documents submitted as part of this pre-application in support of the development proposals, namely:

Document	Prepared By
Application Drawings	Space Architects
Design and Access Statement	Rapleys LLP
Transport Assessment	SCP
Travel Plan	SCP
Flood Risk Assessment	SCP
Phase 1 and Phase 2 Site Investigations	Remada
Biodiversity Net Gain Metric	Enzygo
Preliminary Ecological Appraisal	Enzygo
External Lighting Plan	Signify
Noise Impact Assessment	Miller Goodhall
Energy & Sustainability Statement	DDA
Landscape Plan	FDA Landscape

- 1.4 The submission documents conclude that the proposed development is acceptable and should be supported. Therefore, planning permission should be forthcoming. Against this background, the content of the PS has been set out as follows:
1. Introduction;
 2. Site and Surroundings;
 3. Statement of Community Involvement
 4. Proposed Development;
 5. The Lidl Operation;
 6. Planning Policy Context;
 7. Planning Assessment;
 8. Economic Statement; and
 9. Summary and Conclusions.

2 SITE AND SURROUNDINGS

The Site and Surroundings

- 2.1 The application site generally comprises the Hall Lane Car Park and adjoining land located off Telegraph Way in Kirkby Town Centre. The site extends to 0.64ha, is triangular in shape and has boundaries to Hall Lane, Telegraph Way and the main town centre car park accessed from Irlam Drive. The site is located within the administrative boundary of Knowsley Council.
- 2.2 The site has been in long-term use as a public car park. The immediately surrounding area has, however, been subject to a significant town centre regeneration project, which has resulted in the delivery of a range of food and non-food retail uses, food and drink and leisure uses (Phase I). The application site forms Phase II of the regeneration scheme and has planning permission for retail use.
- 2.3 The site is located within Flood Zone 1. The site is located within Kirkby Town Centre, as defined by the Knowsley Core Strategy, and, therefore, occupies an in-centre location in retail terms.

Access

- 2.4 Vehicular access to the site is taken from Telegraph Way, with pedestrian access being available from Hall Lane, Telegraph Way and through the adjoining town centre car park.

Planning History

- 2.5 A search of Knowsley Council's online planning portal has revealed the following relevant planning history:

REFERENCE	DESCRIPTION	DECISION
17/00559/FUL	Erection of a mixed-use development comprising a foodstore and non-food retail shops (Use Class A1), food & drink and leisure uses (Use Classes A3/A5/D2), petrol filling station, car parking, landscaping, highway improvements and other associated works	Approved – 9 November 2017
17/00559/NMA	Non-Material Amendment to planning permission 17/00559/FUL to provide for revisions to the substation provision	Approved – 12 February 2018
19/00228/FUL	Variation of conditions attached to planning permission 17/00559/FUL to provide for elevational changes, merging of units and alterations to layout	Approved - 12 November 2019
19/00228/NMA1	Non-Material Amendment to planning permission 19/00228/FUL to provide for elevational changes	Approved – 12 October 2020
19/00228/NMA2	Non-Material Amendment to planning permission 19/00228/FUL to provide for elevational changes and PFS canopy	Approved - 2 November 2020
20/00723/FUL	Variation of conditions attached to planning permission 19/00228/FUL to provide for elevational changes and design and layout of the PFS, and extended delivery hours.	Approved – 9 April 2021
19/00228/NMA3	Non-Material Amendment to planning permission 20/00723/FUL to provide for	Approved – 13 April 2021

REFERENCE	DESCRIPTION	DECISION
	changes to the foodstore sprinkler tank and pump housing arrangement	

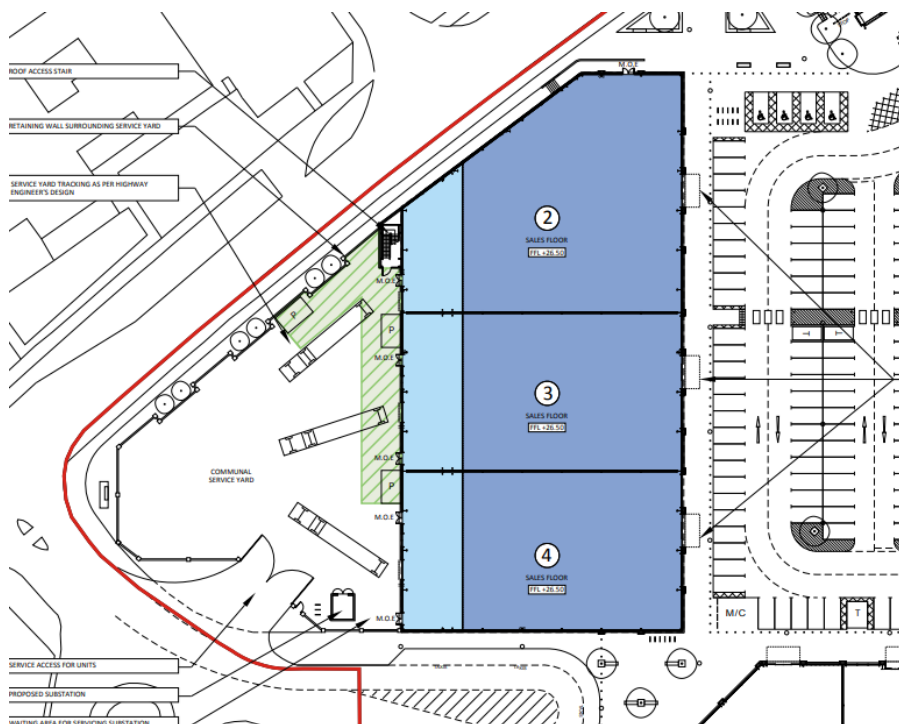
19/00228/NMA4 Non-Material Amendment to planning permission 20/00723/FUL to provide for 2021 changes to the hard and soft landscaping and site layout

2.6 Planning permission 17/00559/FUL granted permission for a comprehensive regeneration scheme comprising the following elements:

- A food store;
- Twelve non-food comparison retail units, one of which may be used for a D2 leisure use;
- Two drive through restaurants;
- A petrol filling station; and
- A 480-space car park.

2.7 The permission provides for the erection of a 3,257m² gross retail building, to comprise a terrace of three non-food retail units, on the part of the site that is the subject of this planning application. The approved retail building has frontage to the shared town centre car park, with a service yard located to its rear, accessed from Telegraph Way. Image 1, below, illustrates the approved site layout.

Image 1



2.8 Planning permission 17/00559/FUL has effectively been implemented through the delivery of the wider Phase I regeneration scheme. The erection of the approved Phase II retail building at the application site may, therefore, be commenced and delivered at any time in perpetuity. This planning approved position is a significant material consideration in terms of determination of the proposed development.

3 STATEMENT OF COMMUNITY INVOLVEMENT

- 3.1 The NPPF outlines the need for effective consultation as part of the development process in association with the preparation of planning applications. A summary of the pre-application consultation undertaken by Lidl is provided below.

Knowsley Council Pre-Application Consultation

- 3.2 An extant planning approval permits the development of a building accommodating three retail units at the application site, the site is allocated in the Core Strategy for comprehensive retail development and the site is located within Kirkby Town Centre. In light of these significant considerations, Lidl has engaged in informal pre-application discussions with the Local Planning Authority. Those discussions have been supportive of the proposed development in principle, and have directed Lidl to pursue this planning application.

Public Consultation

- 3.3 Extensive public consultation was undertaken in 2016 in support of the original planning application for the town centre regeneration scheme (i.e. 17/00559/FUL). This consultation exercise included the following:
- Consultation event for local Councillors and other stakeholders;
 - Leaflet sent to approximately 18,000 local residents and businesses;
 - Press and local advertisement of public consultation event;
 - Social media promotion to over 9,500 individuals;
 - Dedicated project website, with regular updates; and
 - Public consultation event held over two days.
- 3.4 In addition, the Council undertook its own consultation exercise as part of its assessment of the planning application. The Committee Report on application 17/00559/FUL confirms that 614 letters were sent to neighbouring properties in addition to press notices and plans being put on public display. The Report indicates that all responses received were supportive of the development proposals.
- 3.5 The regeneration scheme as a whole, which provided for the construction of a retail building on the part of the site that is now the subject of this planning application, has, therefore, been subject to extensive previous public consultation.
- 3.6 The Applicant has been prohibited from undertaking any further consultation at this stage due to legal obligations. However, the proposed retail building is not materially different in design, appearance or use when compared to that previously approved. Indeed, the only material change is that the proposed building will be occupied by a discount foodstore operator and a non-food retailer as opposed to the previously approved three non-food retailers. Accordingly, further public consultation would essentially seek public opinion on whether Lidl would be welcomed to Kirkby Town Centre, which is expected to be forthcoming when this planning application is in the public domain and consultation is undertaken by the Council.
- 3.7 It is, therefore, proposed that the need for, and scope, of any post-submission consultation should be agreed with the Local Planning Authority in due course.

4 PROPOSED DEVELOPMENT

- 4.1 This application seeks planning permission for the erection of a 2,709m² gross building that will be subdivided to accommodate two retail units. One of the units will comprise a Lidl discount foodstore, selling food and an ancillary range of non-food goods, with the second unit being for non-food retail use.
- 4.2 The proposed Lidl discount foodstore will have a Gross Internal Area (GIA) of 2,235m², of which 1,527m² will be sales area. The sales area will incorporate an 80:20 split between convenience and comparison floorspace, meaning that around 1,222m² will be dedicated to convenience retail and 305m² will be used for comparison retail. The remaining floorspace will comprise warehouse floorspace and ancillary space, to include customer toilets, an in-store bakery, staff welfare facilities, office space and utility space.
- 4.3 The proposed non-food unit will extend to 474m² GIA. The occupier of this unit is not known at this stage.
- 4.4 Both retail units will share the adjoining town centre car park (off Irlam Drive) with the other existing retail neighbours. However, works are proposed to provide six accessible parking spaces, nine Parent & Child spaces and motorcycle parking adjacent to the shop frontage, close to the entrances to the proposed units. Cycle parking facilities will also be repositioned on the frontage in order to accommodate a trolley bay adjacent to the entrance to the Lidl store. Two existing trolley bays located within the car park will be removed.
- 4.5 The proposed retail units will share a dedicated service yard located behind the units, accessed from Telegraph Way. The service yard will accommodate plant compounds to support the function of each retail unit, and a turning circle to ensure that all delivery vehicles, including HGV, can enter and exit the yard in forward gear. Access to the service yard will be gated to prevent unauthorised access and provide a visual screen.
- 4.6 Within the service yard, the Lidl discount foodstore will also have a bespoke delivery bay on the rear (western) elevation of the store, which will enable deliveries to be made safely and efficiently. The delivery vehicles will drive onto the service yard in forward gear and reverse on to a dock leveller, which ensures that the bed of the trailer is the same height of the store floor level. Goods are simply rolled from the trailer into the building in an efficient and comparatively quiet manner. All waste generated by the store will be separated into recycling, store returns, general waste etc and stored internally ready for collection. The delivery vehicle will then take all waste away from the store for recycling or disposal at the Lidl distribution centre in Runcorn. It typically takes 45 to 60 minutes to unload the delivery vehicle and to re-pack it with waste products and recycling.
- 4.7 The non-food retail unit will be serviced at ground level by delivery vehicles with a tail-lift, with double doors to the building enabling goods to be manoeuvred on trolleys from the vehicle into the building.
- 4.8 The proposed development will also be supported by landscaping, which will comprise trees, shrub planting and other landscaping across the site. This will ensure that the site is visually appealing and soften the visual impact of the store.
- 4.9 The Design and Access Statement that accompanies this Statement details the aesthetic appearance of the proposed development. In addition, full details of the proposed development are presented on the drawings which form part of the planning application submission.

5 THE LIDL OPERATION

5.1 Full details of the proposed development are presented in the plans which form part of the planning application submission and are addressed in detail below.

5.2 This section provides an overview of the Lidl retail operation, including the position of the company within the UK retail market and its key trading characteristics.

Position Within the Market

5.3 Lidl commenced trading in the UK in November 1994 and since that date has grown to become a substantial presence in the convenience retail market, with over 980 stores currently trading nationwide. [The Kantar Worldpanel Grocery Market Share](#) data found that on 4 August 2024, Lidl was the sixth largest convenience retailer in Great Britain, with 8.1% of the market share.

Discount Format

5.4 The Lidl retail philosophy is centred on simplicity and maximum efficiency at every stage of the business, from supplier to customer, enabling the company to sell high-quality own brand products at the lowest prices. It is this format that has resulted in Lidl being classified by retail research company Verdict as a 'deep' or 'hard' discounter.

5.5 The 'deep discount' sector includes both Lidl and Aldi, which both operate business models that concentrate on selling a limited range of primarily own brand goods at extremely competitive prices. These retailers are therefore distinct from the 'mainstream' convenience retailers such as Tesco, Asda, Sainsbury's and Morrisons, which offer a significantly greater range and choice of food and non-food goods.

5.6 Lidl is able to offer high-quality products at low prices through specific trading characteristics, which enable the company to achieve significant economies of scale that can then be passed on to the customer in the form of highly competitive prices. Factors that enable Lidl to offer consistently low prices include the format of its stores and the approach taken to the display and sale of products.

5.7 The fact that Lidl provides a distinct offer to the main convenience retailers was recognised by the Competition Commission in its 2008 'Grocery Market Investigation'. The Glossary to the investigation report refers to Lidl as 'Limited Assortment Discounter' or 'LAD', which is defined as:

"Limited Assortment Discounters (i.e. grocery retailers offering noticeably lower prices than a conventional supermarket but which stock a limited range of products)."

5.8 Further reference is made to LAD stores at paragraph 3.3 of the investigation:

"Limited Assortment Discounters (LADs) carry a limited range of grocery products and base their retail offer on selling these products at very competitive prices. The three major LADs in the UK are Aldi, Lidl and Netto. Each of Aldi, Lidl and Netto carries in the region of 1,000 to 1,500 product lines in stores ranging from 500 to 1,500 m² (Stores of a similar size operated by a large grocery retailer generally carry around 10,000 - 15,000 products.)"

5.9 Paragraph 4.80 of the investigation goes on to state that due to the limited number of products carried by LADs they are not close substitutes for other foodstores of a comparable size (i.e. they are different):

"The limited number of products carried by LADs stores means that these stores are not close substitutes for similarly-sized stores operated by CGL (Co-op), M&S, Sainsbury's, Somerfield and Tesco. In particular, we note that Aldi, Lidl and Netto stores typically sell fewer than 1,000 products. In comparison, large grocery retailers generally sell around 5,000 to 10,000 products in stores in the same size range as those operated by LADs (i.e. 500 to 1,400 m²). The results of our entry analysis also show that Aldi, Lidl and Netto stores are not close substitutes for the stores of large grocery retailers."

- 5.10 The findings of the Competition Commission's 2008 investigation therefore confirmed that Lidl does provide a different offer to the main food retailers. This difference has also been acknowledged by the Secretary of State and Planning Inspectors in a number of appeal decisions relating to Lidl stores. In relation to a Secretary of State decision in the London Borough of Merton (APP/T5720/V/04/1171394), the Planning Inspector in his report concluded that:

"283. The Lidl offer is materially different to that provided by the mainstream food retailers".

- 5.11 Furthermore, it was recognised by an inspector when approving a new store in New Addington, Croydon (APP/L5240/A/07/2052053) that:

"17. The Lidl offer is materially different to that provided by the main food retailers and as a result ... would meet a qualitative need by extending consumer choice. Furthermore, it would add a new dimension to competition within the area".

- 5.12 As can be evidenced by the above decisions, the different offer provided by discount foodstores to the likes of Tesco and Sainsbury's is now widely recognised and accepted.

Limited Product Range

- 5.13 Aside from the difference in pricing from the main convenience retailers, another characteristic of the Lidl business model, as already highlighted in the Competition Commission's findings above, is that Lidl carries a comparatively narrow range of primarily own brand products (around 90% of all products in store).
- 5.14 The majority of Lidl product lines consist of basic convenience goods, with a few recognised brands sold, in addition to a limited range of fresh fruit and vegetables and also pre-packed meats and frozen food stuffs. Lidl aims to keep the shopping experience simple for its customers and operates a 'no frills' policy by avoiding unnecessary packaging and presentation, including a basic store fit-out, all of which contributes to keeping the cost of products low.
- 5.15 Non-food items are limited to around 15-20% of floorspace in store. The non-food offer is mainly focused on household cleaning and health and beauty products. Lidl stores do receive a twice weekly delivery of non-food 'specials', which can range from garden equipment and small items of furniture to flat screen TVs. These are sourced to ensure competitive prices with the constant rotation of products. These items are provided on a 'when it's gone, it's gone' basis and owing to the limited and constantly changing offer, the potential for impact upon other retailers is negligible.

Not the Full Retail Offer

- 5.16 Lidl stores also differ from other convenience retailers by not offering any of the following products or services:
- Fresh meat and fish counter;
 - Café/restaurant;
 - Delicatessen/cheese counter;
 - Hot food counter;
 - Home Delivery/click and collect;
 - Pharmacy;
 - Dry-cleaning service;
 - Post Office services;
 - Photographic shop; and
 - Mobile phone shop.
- 5.17 Lidl does not offer such products or services because these do not fit with the company's retail concept and business model. Lidl has a successful, proven format that works, and there is no intention to change it. The introduction of any of the above could have an adverse impact on the prices offered to customers.
- 5.18 As a consequence of the Lidl business model, Lidl customers tend to purchase part of their main grocery shop (i.e., basic staples) in store, taking advantage of the low prices, but then visit other

retailers to purchase luxury food, branded goods or specialist items. This, combined with the fact that Lidl does not offer the products and services listed above that are found in many of the main convenience retailers as well as smaller local independents, means that its stores complement existing retail provision, while providing additional opportunity and choice for shoppers.

Shorter Trading Hours

- 5.19 The standard opening hours for Lidl stores are also more limited than the main convenience retailers, as well as smaller independent convenience retailers. Generally, Lidl stores open in England for a core period of between 08.00–22.00 Monday to Saturday (inclusive of Bank Holidays) and 10.00–16.00 on Sundays.
- 5.20 The standard opening hours of Lidl stores are therefore more limited than other retailers, which is another factor underlining that Lidl does not compete to a significant degree with other retailers, in particular, smaller convenience retailers, many of whom offer additional services and stay open for much longer periods.

Store Format

- 5.21 Lidl has an established store format that is integral to the success of its business model. The minimum store size that is required by Lidl for its operational requirements is circa 2,000 m² gross external area (GEA). This equates to a sales area of approximately 1,300 to 1,600m² Gross Internal Area. Typically, Lidl requires all elements of their foodstores to be set out over a single level (unless there are unusual or exceptional circumstances). There are a number of reasons why this size of store is required.
- 5.22 A single level store of c.2,000m² GEA allows for pallets to be easily moved directly from the delivery bay and placed in the sales area. This cannot be achieved in the same way in smaller stores, resulting in the need to break pallets down and stack more products on shelves, which consequently increases staff costs. This therefore makes it more difficult for Lidl to pass cost savings on to its customers, thereby impacting on its ability to deliver the benefits of discount retailing.
- 5.23 In addition, the standard store format has been purposefully designed in order to provide mobility impaired customers, the elderly and those with small children, space to move through the store easily. Lidl also places bulky goods on the sales floor to ensure that easy access to these items is maintained for all customers.
- 5.24 It has been recognised by the Secretary of State and Planning Inspectors that a single level retail operation is an essential part of the Lidl business model and that consequently 'disaggregation' (breaking stores down into convenience and comparison elements) cannot be achieved without the benefits of the discount format being lost. In this respect, in relation to a Lidl scheme in Oxford (APP/G3110/A/04/1171310L05/1195688) the Inspector noted (paragraph 82) that:

"The fact that Lidl only sell a limited range of goods means there is no realistic scope for disaggregation. Lidl stores cannot be broken down into constituent parts..."

- 5.25 Major deviations from the set store format will incur significant additional costs, both in terms of initial build cost and operation maintenance. This can severely impact on the feasibility of a Lidl scheme and prevent a store from being financially viable, whilst providing customers with the discounted offer they expect. As such, significant deviation from the store model is only considered acceptable in very special circumstances.

Local Catchment

- 5.26 Lidl stores serve a relatively compact catchment area and are intended to provide a local shopping facility. The locational strategy of Lidl is for stores in urban areas, to serve an area that broadly equates to a 5-minute drive-time of the site. Owing to its limited offer, people do not tend to travel long distances to shop at Lidl. The catchment has regard to the nature of the settlement and surrounding area, the location of existing food retail provision within the catchment and consumer travel patterns.
- 5.27 As stated above, many customers use Lidl stores to purchase part of their main grocery shop (i.e. basic staples), taking advantage of the low prices, but then visit other retailers to purchase luxury food,

branded goods or specialist items that are not offered at Lidl. In addition, many Lidl customers also continue to visit smaller independent convenience stores close to their homes for top-up/basket shopping as well as to use services that are not provided by Lidl.

Employment Opportunities

- 5.28 The proposed Lidl store will employ up to 40 staff in store. Lidl has a policy of employing local people from all backgrounds to work in their stores. The company is an equal opportunities employer with a strong social inclusion policy. The following extract is taken from Lidl's employee handbook, which sets out the company's equal opportunities stance:

"Lidl is an equal opportunities employer. We wish to ensure that employees are treated, trained and promoted, and job applicants are selected on the basis of their respective skills, talents, performance and experience, without reference to their sex, marital status, race, colour, nationality, ethnic origin or disability. Whilst the company strives to realise these principles, it is your responsibility to ensure that they are applied in practice. We will not tolerate any form of harassment and we will seek to ensure that your working environment is free from prejudice. Harassment at work is unlawful."

- 5.29 Lidl is committed to investing in their staff and consistently offers one of the highest levels of pay in the UK supermarket sector. From September 2025, pay rises for store and warehouse staff will see entry-level hourly rates rise to £13.00 (£14.35 within the M25), which is higher than the National Living Wage and the National Minimum Wage. Lidl staff also receive other benefits, such as a policy of no zero-hour contracts, a generous holiday package and an in-store discount.
- 5.30 Lidl also offers opportunities for career progression, through many different career paths and opportunities within the retail sector. These include managerial and administrative positions in addition to positions such as store assistants and cashiers. The company also runs comprehensive management development and training programmes, enhancing skills of staff and maximising staff retention.
- 5.31 When setting up a new store, Lidl would bring in a manager from another store that ideally has links with the area. This is vital to provide the necessary experience and leadership during the training period of the new store staff. It is then the responsibility of the store manager and the district manager to recruit and train the necessary numbers of staff prior to store opening. New staff are recruited from the local community using a variety of methods, which can include local newspaper advertisements, Job Centre advertisements and open days.

Deliveries

- 5.32 Lidl products are purchased throughout Europe and then packaged and distributed directly to the relevant Regional Distribution Centre (RDC), of which there are currently 13 in the UK, for onward distribution to its stores across the UK.
- 5.33 Lidl is mindful of the need to minimise any disturbance to neighbouring residents and landowners. To achieve this, each store will typically receive two dedicated deliveries per day (three at peak times such as Christmas and Easter). Each delivery is undertaken by one delivery vehicle, which carries all of the necessary products for the store, including freezer and chilled products. Furthermore, during these deliveries the same delivery vehicle picks up any store waste, which is stored internally in the store warehouse. These delivery and waste pickup practices minimise disruption at the site and in the surrounding area.
- 5.34 Minimal noise is produced during deliveries. Delivery drivers are required to turn their engines off during the delivery, and frozen and chilled products are transported within individual temperature-controlled units, which can be loaded onto the vehicle, meaning that there are no noisy air conditioning units fitted to the delivery vehicles. New stores (such as that proposed) also feature graded ramps in the delivery bay and manual dock levellers, negating the need for noisy scissor or tail lifts. The total unloading time for deliveries is approximately 45 minutes.

Sustainability Measures

- 5.35 Lidl implements a variety of measures to minimise the environmental impact of its stores and to contribute toward sustainability objectives, including:
- Limiting deliveries to two per day. Delivery vehicles are also used to remove waste from the store on their return journey to the RDC where the waste/recyclable material is sorted and managed centrally. This also helps to reduce vehicle trips and emissions;
 - Lidl leads the sector in terms of recycling and waste to landfill reduction by recycling all paper/cardboard and plastic waste produced by the store. This means that over 80% of all waste produced in store is recycled;
 - Lidl stores include highly efficient mechanical and electrical systems, which recover waste heat from the combustion process. All heating is regulated by sensors;
 - New Lidl stores typically have roof mounted photo-voltaic arrays ensuring that a large proportion of the anticipated electricity demand for the store comes from a renewable source;
 - Lidl car parks typically provide at least 2 rapid charging vehicle spaces with further passive provision for future EV roll out;
 - All Lidl stores are fitted with a 'Building Management System' incorporating movement sensors, Lux meters and thermostatic controls. This ensures that the back of house areas of the store are only lit when people are using them, that external lighting is only used when required and that the temperatures of the various areas within store are maintained at the correct levels. Energy efficient LED lighting is used and lighting within the sales area is cutback to one third before and after trading hours;
 - Water consumption is carefully monitored, and flow control devices and water meters are fitted in all stores; and
 - Car park lighting is designed in accordance with Lidl's 'Dark Sky' policy with light fittings carefully specified in order to keep light spill beyond the site boundary to a minimum, with Lux and timer controls fitted.
- 5.36 Lidl also produces and implements Travel Plans to promote sustainable transport choices. A Travel Plan has been submitted as part of the application.
- 5.37 Lidl communicates to staff and customers on a continual basis and encourages all stakeholders to implement environmentally friendly practices where possible.

Secured by Design and Equalities Act

- 5.38 Lidl designs its stores and sites to minimise anti-social behaviour and crime, and provides open and well-lit schemes to deter criminal activity. Lidl will, if required, fit CCTV internally and/or externally to ensure the safety of staff, customers and property.
- 5.39 Lidl provides its customers with disabled car parking spaces that comply with the latest Equalities Act Regulations, ensuring all users of the store can manoeuvre as simply as possible. Lidl car parks are designed with the customer in mind to ensure that cars can pass easily into and around the car park. Disabled and parent and child spaces are positioned near the store entrance, in order to provide shorter walking distances from cars to the store.

SUMMARY

- 5.40 The key trading characteristics that distinguish Lidl from the mainstream convenience retailers and smaller independent retailers are therefore as follows: -

1. **Restricted number of product lines** – Lidl sells a limited range of predominantly own brand goods, with customers visiting other stores for branded or luxury goods.
2. **Not the full retail offer** – Lidl does not provide the full retail offer. Only a limited range of comparison goods are sold and the constantly changing nature of ‘non-food specials’ ensures that any impact on other retailers is not constant and is limited. Lidl stores do not offer the range of services provided by the mainstream food retailers or smaller independent stores.
3. **Small store size and localised catchment** – Lidl stores do not draw customers from a wide area.
4. **Shorter trading hours** – Lidl stores are not open ‘all hours’ and so do not attempt to compete with 24-hour mainstream food retailer operations and the extended opening times of local convenience stores.

5.41 The above factors ensure that the trading impacts of new Lidl stores on existing retailers and centres are limited.

5.42 Lidl stores also bring substantial benefits to an area, including new discount convenience retail options, new highly competitive retail employment opportunities and a store which is designed and operated in a manner which seeks to minimise disruption and promote sustainability.

6 PLANNING POLICY CONTEXT

- 6.1 This section sets out the relative planning policy context of the proposed development at both a national and local level.

NATIONAL POLICY

- 6.2 National planning policy is set out within the National Planning Policy Framework (2024) (NPPF), which is supplemented by the Planning Practice Guidance (PPG).
- 6.3 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision taking this means:
- approving development proposals that accord with an up-to-date development plan without delay, or
 - where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provide a clear reason for refusing the development proposed, or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
- 6.4 Under decision-making, the NPPF sets out that *“early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties”*, with the *“the more issues that can be resolved at the pre-application stage”*, the greater the benefits.
- 6.5 Section 4 of the NPPF (Decision-making) confirms that local planning authorities should approach decisions on proposed development in a positive and creative way by working proactively with applicants *“to secure developments that will improve the economic, social and environmental conditions of the area”*.
- 6.6 Section 6 of the NPPF (Building a strong, competitive economy) states that *“significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”*.
- 6.7 Section 7 of the NPPF (Ensuring the vitality of town centres) sets out that policies and decisions should *“support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”*.
- 6.8 Section 9 of the NPPF (Promoting sustainable transport) expects development to promote sustainable access. Paragraph 116 further states that *“development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”*.
- 6.9 In achieving well-designed places, Section 12 of the NPPF confirms that good design is a key aspect of sustainable development and creates better places in which to live and work. Good design also helps to make development acceptable to communities.

LOCAL PLANNING POLICY

- 6.10 The adopted development plan for Knowsley Council consists of the following:
- Knowsley Local Plan Core Strategy (adopted January 2016); and
 - Saved policies of the Knowsley Replacement Unitary Development Plan (adopted June 2006).
- 6.11 The policy context of the site and the relevant planning policies are outlined below.

Knowsley Core Strategy

- **Policy SD1 (Sustainable Development)** confirms that the Council will adopt the presumption in favour of sustainable development that is set out in the NPPF.
- **Policy CS1 (Spatial Strategy for Knowsley)** states that development will be focused in existing urban areas, particularly in areas in need of regeneration, which include Kirkby Town Centre.
- **Policy CS2 (Development Principles)** identifies the key considerations that will be taken into account when assessing development proposals, which have objectives relating to sustainable economic development, reducing carbon emissions, reducing the need to travel, recognising environmental limits and making the most of resources and infrastructure.
- **Policy CS4 (Economy and Employment)** presents the overall employment development strategy, confirming that retail development should be delivered within existing town centres, with development outside such centres being required to follow the sequential approach to site selection.
- **Policy CS6 (Town Centres and Retail Strategy)** identifies Kirkby as a Town Centre that sits at the top of the local retail hierarchy, where development should support and enhance its role as a primary shopping destination. The policy confirms that there is a need for significant retail-led regeneration in Kirkby Town Centre, to include both convenience and comparison retailing.
- **Policy CS7 (Transport Networks)** confirms that new development proposals will be required to be accessible by a choice of modes of travel, with larger development occupying the most accessible locations. Proposals are required to be supported by a Transport Assessment and a Travel Plan.
- **Policy CS8 (Green Infrastructure)** requires new development to contribute towards green infrastructure and to protect and, where possible, enhance biodiversity.
- **Policy CS10 (Principal Regeneration Area – Kirkby Town Centre)** confirms that comprehensive redevelopment will be supported where it will enhance the vitality and viability of Kirkby Town Centre.
- **Policy CS19 (Design Quality and Accessibility in New Development)** requires new development to achieve a high standard of design that responds to, and integrates with, local context. Proposals are also required to maintain a good standard of amenity for occupants and neighbours, and to address the challenges of climate change in terms of sustainable design, biodiversity, flood risk and energy efficiency and use of resources.
- **Policy CS22 (Sustainable and Low Carbon Development)** identifies the measures that new development will be expected to achieve in order to a high standard of sustainable design and construction and minimise carbon emissions.
- **Policy CS24 (Managing Flood Risk)** encourages development to be located in areas at the lowest risk of flooding.
- **Policy CS26 (Waste Management)** requires new development to minimise waste, promote the use of reclaimed and recycled materials and to facilitate the collection and recycling of waste.

Saved Policies of the Knowsley Replacement Unitary Development Plan

- **Policy T5 (Location of Major Traffic Generating New Development)** requires major development to be within safe and convenient walking distance of public transport facilities.
- **Policy T7 (New Development and Walking and Cycling Routes)** requires new development to support and, where possible, enhance walking and cycling routes.
- **Policy T8 (Transport Assessments)** advises what forms of new development will be required to be supported by a Transport Assessment and confirms that proposals that may prejudice the function of the highway network will not be supported unless appropriate mitigation is proposed.

- **Policy T9 (Travel Plans)** states that major development will be expected to implement a Travel Plan.
- **Policy T10 (Access for the Less Mobile)** requires new development to be designed to be inclusive throughout its lifetime.

Supplementary Planning Documents

6.12 The Supplementary Planning Documents (SPD) relevant to the planning application include:

- Ensuring a Choice of Travel Supplementary Planning Document (September 2010);
- Design Quality in New Development Supplementary Planning Document (January 2016);
- Town Centre Uses Supplementary Planning Document (2022); and
- Adding Social Value to Development: Employment and Skills Supplementary Planning Document (September 2018).

Emerging Local Plan

6.13 The March 2025 Local Development Scheme indicates that the preparation of a new Local Plan is currently on hold pending clarification from the Government on the scope of Local Plans. Accordingly, work was not expected to start on the preparation of a new Plan until October 2025.

SUMMARY

6.14 The proposal has been prepared considering the policies referred to above, as set out in the following section of this Statement.

7 PLANNING ASSESSMENT

7.1 Based on the preceding review and analysis of the planning policy, guidance and material considerations relevant to the site and the proposals, the key planning issues relevant to the determination of this application are as follows: -

- Principle of Development;
- Design;
- Transportation and Highways;
- Flood Risk and Drainage;
- Compatibility with Neighbouring Uses;
- Trees, Landscape, Biodiversity and Ecology; and
- Response to Climate Change.

7.2 Each of the above topics is addressed in turn below.

Principle of Development

7.3 The application site is located within Kirkby Town Centre, where Core Strategy Policy CS6 confirms that there is a need for significant retail-led regeneration, to include both convenience and comparison retailing. Furthermore, Policies CS1 and CS10 identify Kirkby Town Centre as a Principal Regeneration Area where regeneration opportunities will be maximised in accordance with the Local Plan strategy. Policy CS10 specifically encourages the delivery of new convenience and comparison floorspace in Kirkby Town Centre to enhance its vitality and viability. The principle of the proposed development is, therefore, directly aligned with the strategic objectives of the Knowsley Core Strategy and is directly supported by its policies.

7.4 In recognition of the inherent suitability of the application site to accommodate new retail development, planning permission has been previously granted (17/00559/FUL) to deliver a 3,257m² GIA retail building at the application site. The scale of the proposed retail building is 548m² gross smaller than that which already has planning permission.

7.5 The main difference between the proposed development and the previously approved scheme is the type of retailing that will be undertaken from the retail building. It is proposed that the building will be used for both food and non-food retailing, whereas the previously approved position allows non-food retail use only. The introduction of food retailing is, however, entirely appropriate at this in-centre location and fully accords with the aims and objectives of Core strategy Policies CS1, CS6 and CS10 and the 'town centre first' objective that underpins the NPPF policy guidance. Indeed, the application site is the priority location to deliver new retail floorspace in Kirkby.

7.6 The principle of delivering the proposed development in this location is, therefore, fully compliant with local and national planning policy objectives.

Design

7.7 The accompanying Design & Access Statement demonstrates how the proposed building has been designed to provide an aesthetically sound retail store built to a high standard. The design has, however, also been directly informed by the previously approved building design (i.e. 17/00559/FUL) to ensure that the building will continue to form a cohesive design component of the wider town centre regeneration scheme and contribute positively to the character of the area, as illustrated by Images 2 and 3 below.

Image 2: Previously Approved Front Elevation



Image 3: Proposed Front Elevation



- 7.8 As the above images illustrate, a consistent approach towards the scale and form of the retail building, its design and use of materials is proposed. The adaptations to the design to meet Lidl's operational requirements, to include the extensive shopfront glazing and canopy, will further enhance the appearance.
- 7.9 Overall, the design of the proposed building will make a positive contribution towards the character and setting of the local area.

Transportation and Highways

- 7.10 A Transport Assessment and a Travel Plan are submitted as part of this application. The Transport Assessment demonstrates that the application site is accessible by a choice of modes of travel and that the traffic it will generate can be accommodated on the local highway network without causing an unacceptable impact on highway capacity or highway safety.
- 7.11 The proposals will result in the re-arrangement of part of the existing main town centre car park, which is shared with the neighbouring uses. This re-arrangement will result in the loss of 10 parking spaces in order to accommodate accessible spaces, Parent & Child spaces and motorcycle parking adjacent to the entrances to the proposed retail units. This modest reduction in car parking provision is not expected to result in a shortage of car parking provision or to create unacceptable off-site parking pressures, particularly when taking account of the reduction in the gross floorspace of the proposal compared to that previously approved and the overall accessibility of the site by non-car modes of travel. Furthermore, surplus capacity has been identified in the adjoining car parks, further confirming that the proposed modest reduction in parking provision is acceptable.
- 7.12 The accompanying Travel Plan demonstrates how the occupiers of the proposed retail units will encourage travel by non-car modes.
- 7.13 It can, therefore, be concluded that the proposed development is policy compliant and will not have an adverse impact on highway safety or highway users.

Flood Risk and Drainage

- 7.14 The application is supported by a Flood Risk Assessment, which confirms that the site is at low risk of flooding from all sources. The application site is a less vulnerable use in flood risk terms, which is acceptable in areas identified as Flood Zone 1. There are no records of historical flooding related to the application site and the site is not within source protection zone.
- 7.15 The Flood Risk Assessment also presents the Applicant's proposed drainage strategy. It is proposed that on site attenuation will be installed together with water quality management measures to facilitate a surface water discharge rate of 1.6l/s.
- 7.16 The Flood Risk Assessment, therefore, demonstrates that the proposed development will not result in an increased risk of flooding and is policy compliant.

Compatibility with Neighbouring Uses

- 7.17 In principle, the proposed development has the potential to impact upon neighbouring uses as a result of the proposed external lighting, the operation of external plant and the HGV delivery process. However, as demonstrated below, the proposal will not, or can be made to not, result in unacceptable levels of impact on its neighbours.
- 7.18 All internal and external lighting within the store and car park will be controlled by the store's Building Management System. External lighting will be controlled by timers and remote sensors. The timers ensure that the lighting can only come on during certain times of the day, with the remote sensors ensuring that lights only turn on when natural day light falls below a pre-set limit. The System will permit all external lighting to switch on 1 hour before store opening (to assist the arrival of staff) and switch off 1 hour after store closing (to assist staff departures). However, such lighting will only actually automatically switch on if natural light levels are sufficiently low.
- 7.19 Accordingly, internal and external lighting (including signage) will not be illuminated overnight at any time and will only be illuminated during the daytime if natural light levels fall below the pre-set sensor limit. Lighting associated with the proposal is, therefore, highly unlikely to have an unacceptable impact on the amenity of neighbouring residents.
- 7.20 With regard to store deliveries, Lidl uses delivery vehicles that do not have externally mounted chiller units. Instead, frozen and chilled goods are transported in temperature controlled containers, which are moved from the delivery vehicle into the store warehouse in an identical manner to all other goods. Delivery vehicle engines are, therefore, switched off during the delivery process, which materially reduces the level of noise generated by the delivery process.
- 7.21 The application is supported by a noise assessment that considers the potential noise implications resulting from the Lidl store. The noise assessment concludes that, when assessing the cumulative noise effects of both the delivery process and the operation of external plant located within the plant compound, the noise generated by the proposed development will result in no impact during the daytime and a limited low impact during the night time period.
- 7.22 It is, therefore, demonstrated that noise and activity generated by the proposed use will not result in any unacceptable impacts on the amenity of neighbouring occupiers.

Trees, Landscaping, Biodiversity and Ecology

- 7.23 The application site currently comprises areas of mown grassland set around a town centre public car park. As such, the existing ecological and landscape value of the site is limited.
- 7.24 The accompanying Preliminary Ecological Appraisal confirms that the proposed development has no realistic potential to harm any protected or priority species or harm habitat. It is recommended that any wildlife encountered on site should be safely moved to a suitable off-site refuge habitat.
- 7.25 The statutory 10% net gain in biodiversity will be achieved on-site.

- 7.26 Overall, the proposed development will not result in any adverse impacts upon trees, habitats, or protected or priority species, and will achieve a net gain in biodiversity. The requirements of local and national planning policies in this regard will be satisfied.

Response to Climate Change

- 7.27 Lidl is firmly committed to delivering a modern, energy efficient and operationally efficient building. Accordingly, the proposed store seeks to maximise opportunities to reduce energy consumption, use energy efficient materials and equipment and enhance operational efficiency.
- 7.28 A key feature of the proposals will be the new shop front, which will have a large expanse of glazing in order to allow daylight to illuminate the shop floor and enhance the shopping environment, whilst also reducing energy consumption on internal lighting. This proposed design will also enhance the appearance of the store and will create animation and provide natural surveillance.
- 7.29 All internal and external lighting will be LEDs that are remotely operated using sensors, with lights turning on when someone approaches the sensor and off after a set period of inactivity. The lighting on the sales floor will reduce to one third of the normal level outside trading hours and will be turned off at the end of the day.
- 7.30 Lidl stores use modern materials and sustainable construction techniques which help reduce construction time and building waste. For example, parts of the store will be clad in composite panels, which are fully weather resistant and require no maintenance. The panels also offer excellent thermal insulation and low thermal transmission properties, thereby saving on heating and cooling costs, and are fully recyclable or re-usable. The use of this product also contributes to a faster build time.
- 7.31 Lidl strives to specify highly energy efficient plant and equipment. For example, all refrigeration equipment will have a Class A energy rating and water efficient fixtures and fittings will be installed, such as aerated/low flow taps and dual flush WCs. Furthermore, the refrigeration plant boasts low carbon emission ratings and operates without the need for CFCs, meaning less harm to the environment.
- 7.32 An air source heat pump will be installed that will exchange heat between the outside air and a building to provide space heating in winter and cooling in the summer months. In addition, an array of solar panels will be installed on the roof of the Lidl store to generate on-site renewable energy to help meet the demands of the store.
- 7.33 The accompanying Energy and Sustainability Statement draws the following conclusions:
- The store will achieve a 156.55% carbon dioxide reduction and a 170.53% energy reduction, when assessed to Part L 2021 Building Regulations and accounting for the proposed passive, active and LZC strategies; and
 - The expected annual energy generation through low and / or zero carbon technologies will be greater than the store's anticipated regulated energy consumption. Therefore, some of the on-site electrical energy generation may be exported back to the grid.
- 7.34 The proposed development, therefore, accords with local and national policies on sustainability.

8 ECONOMIC STATEMENT

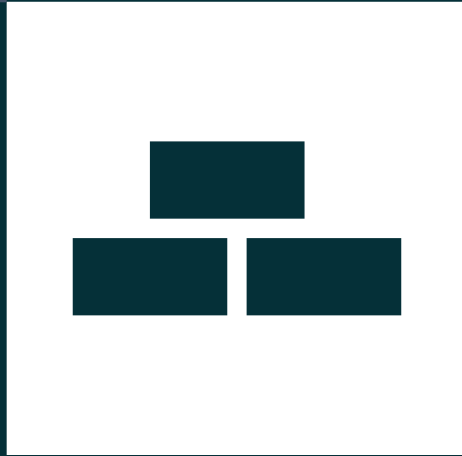
- 8.1 This Economic Statement specifically responds to the requirements of Core Strategy Policy CS4, which requires new development to improve accessibility to employment opportunities, address barriers to employment and encourage local recruitment.
- 8.2 The proposed discount store is expected to create approximately 40 full and part-time job opportunities. Lidl will offer staff flexible working arrangements, with part-time hours ranging from 9 to 36 hours per week. Accordingly, some part-time opportunities at the store will be equivalent of a full-time position elsewhere. As a result, the number of full and part-time jobs will be weighted towards full-time positions, depending upon take-up, with the store expected to create at least 20 Full Time Equivalent jobs. The range of positions that Lidl offers and flexibility in the number of hours worked is a further advantage of the proposal.
- 8.3 Lidl is committed to investing in its staff and consistently offers one of the highest levels of pay in the UK supermarket sector. From September 2025, pay rises for store and warehouse staff saw entry-level hourly rates rise to £13.00 (£14.35 within the M25). Lidl staff also receive other benefits, such as a policy of no zero-hour contracts, a generous holiday package and an in-store discount. Lidl also offers job training and genuine opportunities for career progression. Indeed, many of Lidl's non-sales staff started employment on the shop floor and have progressed to other roles in the company, with a wide range of roles being available, in principle, on a global scale.
- 8.4 The jobs that Lidl will deliver will, therefore, be attractive to a wide range of job seekers, be well paid and support career building. They will also be provided by one of the largest global retailers, thereby providing job security. Significantly, should planning permission for the store be granted, the jobs will be created within a short timescale, with Lidl being keen to commence the development of the store at the earliest opportunity.
- 8.5 Lidl prefers to employ members of staff from the local area in order to encourage a sense of pride and ownership in their place of work and to foster relationships between the store and the local community. It is, therefore, expected that the majority of staff will live within the local area and be able to travel to work by non-car modes.
- 8.6 The development scheme can also be expected to create new job opportunities for local people, and consolidate and support existing jobs, during the construction phase. These jobs may be created and supported both on site and along the supply chain, including support for local businesses. Opportunities for training, career development and work experience are expected to be created.
- 8.7 The accompanying Employment & Skills Plan details how the Applicant expects the proposed development to contribute towards job creation, training and education during both the construction and operational phases of development.
- 8.8 Overall, the proposed development will offer significant tangible economic benefits to the local area and create economic opportunities for local people. As a result, the requirements of Policy CS4 are satisfied in full.

9 SUMMARY AND CONCLUSION

- 9.1 This Statement presents an assessment of the proposed development against the applicable requirements of the NPPF, the development plan and other material considerations.
- 9.2 It has been demonstrated that the proposal satisfies all relevant policy requirements and that there are no other material considerations which indicate that planning permission should not be forthcoming. On the contrary, it is a significant material consideration that there is a live planning permission to deliver a retail building of a similar design, but of greater scale than that hereby proposed at the application site. This represents a significant fall-back position that is of significant weight to the consideration of all planning matters.
- 9.3 The development proposal comprises sustainable development for the following reasons:
- The proposed development will be located in Kirkby Town Centre, which is the most preferable location to deliver new retail development in the town;
 - The proposed development will deliver significant economic benefits to the area and offer new employment opportunities for local residents;
 - The development is accessible by sustainable transport means and will not result in a severe impact on the highway network or other elements of the transport network;
 - The site is not at risk of flooding and will not increase the risk of flooding elsewhere;
 - The design and appearance of the retail building, the site layout and proposed landscaping will enhance the character of the surrounding area;
 - The development will not result in unacceptable impacts upon the amenity of neighbouring uses; and
 - Appropriate tree planting and landscaping will be delivered on site to achieve a net gain in biodiversity.
- 9.4 Overall, the proposed scheme adopts the principles of sustainable development, in relation to social, economic and environmental factors. The proposals accord with the emphasis of national policy contained within the NPPF, which confirms a presumption in favour of sustainable development.
- 9.5 In these terms, it has been demonstrated that the scheme complies with relevant policy as set out within the NPPF and the Development Plan. Therefore, this planning application should be supported.

Site Location Plan





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