

Lidl Great Britain Ltd

Planning & Retail Statement

Land off Commercial Street,
Risca/Pontymister

PAC DRAFT

January 2025



Document control

Prepared by	Rhianon Jones
Checked by	Rob Mitchell

PAC DRAFT



Contents

1.0	Introduction.....	1
2.0	The Proposed Development.....	2
2.1	The Application Site and Surroundings.....	2
2.2	Active Travel and Site Accessibility.....	3
2.3	Planning History.....	3
2.4	The Proposed Development.....	4
2.5	Lidl Operational Model.....	5
2.6	Pre-application Consultation and Engagement.....	7
2.7	Statutory Planning Application Consultation.....	8
3.0	Planning Policy Context.....	9
3.1	The Development Plan.....	9
3.2	Future Wales: The National Plan 2040 (February 2021).....	9
3.3	Caerphilly Local Development Plan (to 2021).....	9
3.4	Other Material Considerations.....	15
3.5	2nd Replacement Local Development Plan 2020 – 2035 (2RLDP).....	19
4.0	Assessment of Existing Provision.....	20
4.1	Introduction.....	20
4.2	The Primary Catchment Area (PCA).....	20
4.3	Designated Centres.....	21
4.4	Risca/Pontymister Town Centre.....	21
4.5	Summary.....	23
5.0	The Need for the Proposed Development.....	24
5.1	Introduction.....	24
5.2	Quantitative capacity.....	24
5.3	Qualitative Considerations.....	25
5.4	Summary.....	26
6.0	The Sequential Approach to Site Selection.....	28
6.1	Introduction.....	28
6.2	Status of the application site.....	28
6.3	Application of the Sequential Approach.....	28



6.4	Site Search Parameters	30
6.5	Sequential Site Search	32
6.6	Assessment of Alternative Sites	32
6.7	Summary	33
7.0	Assessment of Impact	34
7.1	Introduction	34
7.2	Methodology and evidence base	34
7.3	Impact on Existing, Committed or Planned In-centre Investment	36
7.4	Impact on Allocated Sites Outside Centres	36
7.5	Cumulative Effects of the Development	36
7.6	Impact on Centre Vitality and Viability and In-Centre Turnover and Trade	36
7.7	Summary	39
8.0	Non-retail Principal Planning Considerations	40
8.1	Introduction	40
8.2	Principle of Development	40
8.3	Design, Appearance and Soft Landscaping	41
8.4	Flood Risk and Drainage	42
8.5	Biodiversity	44
8.6	Transport	45
8.7	Noise	46
8.8	Air Quality	46
8.9	Economic Benefit	46
8.10	Sustainability	47
8.11	Summary	47
9.0	Summary and Conclusions	48

List of Appendices

- Appendix A – Site Layout Plan
- Appendix B – Primary Catchment Area
- Appendix C – Risca / Pontymister plan
- Appendix D – Statistical tables



1.0 Introduction

- 1.1.1 This Planning and Retail Statement (PRS) has been prepared by CarneySweeney (CS) on behalf of the applicant, Lidl Great Britain Ltd, in support of a full planning application for the erection of a Class A1 retail foodstore with surface level car parking, landscaping, all associated development at land off Commercial Street, Risca.
- 1.1.2 Lidl is currently represented in Risca at its existing store at Commercial Street. The existing Lidl store is a small, and of an early generation format. Owing to Lidl's well established and growing local customer base, Lidl has outgrown its existing premises which no longer meets modern shopper requirements. On this basis it is proposed to relocate to a larger site along Commercial Street. The existing store site will be subject to its own mixed use residential led redevelopment proposals (submitted under a separate application).
- 1.1.3 This report focuses on the general planning and retail policy issues associated with the application proposals. It is intended to assist Caerphilly County Borough Council (CCBC) in its determination of the application and has been prepared in accordance with the requirements set out in the Local Development Plan, Future Wales: The National Plan 2024 and Planning Policy Wales.
- 1.1.4 This report is not a standalone document and should be read in conjunction the Design and Access Statement and other technical documents and drawings submitted with the application.
- 1.1.5 The remainder of the report is structured as follows:
- Section 2 provides a detailed description of the site and the proposed development;
 - Section 3 provides a summary of the relevant development plan policies;
 - Section 4 sets out an assessment of existing retail provision;
 - Section 5 considers the need for the proposed development;
 - Section 6 considers the application of the sequential test;
 - Section 7 provides an assessment of retail impact;
 - Section 8 outlines the key planning considerations; and
 - Section 9 presents the overall conclusions.



2.0 The Proposed Development

2.1 The Application Site and Surroundings

- 2.1.1 The application site is located off Commercial Street on the eastern edge of Risca Town Centre as shown on Figure 2.1 below. The site is a broadly rectangular parcel of land which measures approximately 1.07ha and currently comprises underused brownfield land within the built-up area of the town.
- 2.1.2 To the north of the site there are a number of retail and commercial properties fronting onto Commercial Street. These include a veterinary centre, an Indian restaurant, a coffee shop, barbers and a petrol filling station with a Premier shop. To the east is the B4591 and to the south is the Ebbw River. A footpath runs along the site's western boundary with brownfield land beyond this. The site is currently accessed from Commercial Street.
- 2.1.3 The existing Lidl store lies approximately 500m to the south of the application site. A Tesco and Aldi store lie to the south of the centre, in out of centre locations.



Figure 2.1: General Site Location (site outlined in red)

- 2.1.4 The site does not lie within a Special Landscape Area, nor is it affected by any conservation areas and there are no listed buildings on or within the vicinity of the site. The site does not lie within or near to an Air Quality Management Area. The TAN 15 flood map for planning shows the site as falling within a TAN 15 defended zone along with the whole of Risca Town Centre



including the existing Lidl store site. The site lies within a Coal Mining Reporting Area. There are no other statutory or non-statutory designations of relevance to the site.

2.2 Active Travel and Site Accessibility

- 2.2.1 The surrounding area benefits from excellent pedestrian and cycle, and public transport infrastructure, offering opportunities to travel to the site by these modes.
- 2.2.2 Bus stops are situated directly next to the site which provide access to all the key bus services routing through Risca. These services provide frequent bus travel opportunities through both Risca and the wider area.
- 2.2.3 Risca and Pontymister rail station is located a short walk from the site. The station provides access to regular rail services routing between Cardiff / Newport and Ebbw Vale, which can support potential longer distance employee commuting trips to the site.
- 2.2.4 In summary, it is considered that the site has high levels of accessibility by most of the main non-car modes of transport. Access to the site by foot and cycle is of an excellent standard, and bus connections also available within close proximity, thereby enabling access to the site from a range of local destinations.

2.3 Planning History

- 2.3.1 An online search of the Council's planning page has revealed the following planning history relating to the application site.
- 11/0446/FULL - Erect care home (Use Class C2), retail (Use Class A1 and A3) and office (Use Class B1 and A2) units with associated parking, engineering and landscaping works - Granted 02.11.2011.
 - 14/0611/FULL - Construct flood defences, improve and maintain existing flood defences along the River Ebbw as part of the Risca Flood Risk Management Scheme plus associated engineering operations and landscape works. Granted 03.11.2014.
 - 15/0591/NMA - Seek approval of a non-material amendment to the wording and plans as stated in Condition 04 of planning consent 14/0611/FULL (Construct flood defences, improve and maintain existing flood defences along the River Ebbw as part of the Risca Flood Risk Management Scheme plus associated engineering operations and landscape works). Granted 12.10.2015.
 - 15/1067/COND - Discharge condition 11 (imported materials) of planning permission 14/0611/FULL. Decided 18.11.2015.
 - 15/0981/COND - Discharge Condition 2 (programme of archaeological work), Condition 6 (Invasive Species) & Condition 7 (Otter Monitoring) of planning consent 14/0611/FULL. Decided 18.11.2015.



- 15/1082/COND - Discharge condition 9 (highway works) on planning consent 14/0611/FULL. Decided 29.01.2016.
- 16/0662/COND - Discharge condition 5 (landscape management) of planning consent 14/0611/FULL (Construct flood defences, improve and maintain existing flood defences along the River Ebbw as part of the Risca Flood Risk Management Scheme plus associated engineering operations and landscape works) - Granted 21.09.2016

2.4 The Proposed Development

The Application Proposals

- 2.4.1 Lidl's existing store on Commercial Street is small and of an early generation format. Owing to Lidl's well established and growing local customer base and latest operational requirements, Lidl has outgrown its existing premises which no longer meets modern shopper and operational requirements, and a larger store is necessary to safely cater to local customer demand. The constrained nature of the existing plot means an extension to the existing store is not considered feasible. Moreover, the existing site is subject to a separate mixed-use residential redevelopment proposal (to be submitted in due course).
- 2.4.2 The proposed development seeks planning permission for the following:
- "Erection of a Class A1 retail foodstore with surface level car parking, landscaping, and all associated development"*.
- 2.4.3 The proposals are shown on the Proposed Site Layout Plan enclosed at **Appendix A** and comprise:
- The erection of a Class A1 food store of total floorspace of 1,962 sqm (GIA) (c.1,334 sqm net sales);
 - 112 car parking spaces including 9 parent and child, 7 disabled and 2 Electric Vehicle charging bays;
 - Cycle spaces will also be provided; and
 - Associated drainage and landscaping.
- 2.4.4 The applicant has considered a range of development options to best respond to the constraints and opportunities of the site. The store will be built in accordance with Lidl's latest specification providing, inter alia, a lighter, more spacious sales area, with full height glazing to the front elevation.
- 2.4.5 Further details are provided on the accompanying draft Site Layout Plan and Design and Access Statement.



Access and Parking

- 2.4.6 A new vehicle access will be created off the B4591 for customers whereas service vehicles will access the site from the existing access off Commercial Street.
- 2.4.7 Pedestrian access and linkages to the store entrance are proposed from a new footpath off the site's eastern boundary and via a newly proposed straighter alternative route to the existing footpath which runs along the site's western boundary (see submitted site layout plan). This will safely link the store to the town centre/Commercial Street to the north and the Pontyminster Industrial Estate (home to Tesco Extra, Screwfix and KFC) to the south. Perimeter landscaping is proposed to frame the proposed development within its wider setting.

2.5 Lidl Operational Model

2.5.1 Lidl is now exceptionally well established in the UK with the Company operating in excess of 970 stores from sites and premises both within and outside town centres. Its market share continues to increase substantially, and the Company is expanding its store network considerably. The UK operational model is based firmly on the success of Lidl's operations abroad with more than 10,800 stores trading across Europe.

2.5.2 Lidl was characterised by the Competition Commission in its Groceries Market Investigation Final Report in 2008 as a Limited Assortment Discounter (LAD). The Commission said that LADs:

“carry a limited range of grocery products and base their retail offer on selling those products at very competitive prices. The three major LADs in the UK are Aldi, Lidl and Netto. Each ... carries in the region of 1,000 to 1,400 product lines in stores ranging from 500m² to 1,400m² (stores of a similar size operated by a large grocery retailer generally carry about 5,000 products). Aldi, in large part, carries only own label goods while both Lidl and Netto carry larger volumes of branded products”.

2.5.3 Whilst this report is over ten years old, its description of the LAD business model remains sound, albeit Netto no longer trades in the UK; the size of Lidl and Aldi stores has increased to some extent; and the number of product lines sold has increased to circa 1,600 to 2,000. Nonetheless, the clear points of differentiation between the LAD operators, the main grocers (Tesco, Asda, Sainsbury's, Waitrose and Morrisons) and convenience stores remain clear and readily identifiable, with the LAD operators selling limited ranges of staple products and catering predominantly for main food shopping needs.

2.5.4 The Commission, Inspectors and Secretary of State have expressly recognised that LADs offer particular benefits of quality and value. Lidl sells a limited number of product lines, but all of its business practices are aimed at driving down costs so that it can provide exceptional value for money across the whole of its product range. Lidl typically sells around 3,000 product lines, whereas the main grocers (Tesco, Asda, Sainsbury's & Morrison's) will sell in excess of 35,000



products. The number of value lines that the main grocer's stock is limited, whilst the whole of the LAD business model is geared to providing exceptional value.

2.5.5 Consumers no longer assume that the quality of goods sold by LAD operators must be low to achieve cheap prices. Indeed, Lidl is able to offer very competitive prices whilst keeping the quality of its goods extremely high and achieves this through a combination of:

- tremendous buying power as a result of the scale of its operations across Europe;
- a concentration on own brands (now about 80% of its product range) which avoids passing on the cost of brand name marketing to the consumer;
- its decision to stock a much more limited product range than others, concentrating on goods that form a very high proportion of the weekly food shopping needs of most households;
- operating systems that reduce operational costs; and
- simple product display and stock handling procedures.

2.5.6 The ability to offer a consistent range of high-quality goods at competitive prices enables Lidl to distinguish itself from other operators that may be perceived as operating similar business models. The whole of the Lidl product range delivers value whereas the major grocers only stock own brand and 'value' lines amongst their branded and premium products.

2.5.7 Lidl does not stock convenience goods such as tobacco, or individual confectionary items and stocks limited pre-packed fish and meat and individual fruit and vegetable products. Lidl also does not provide services such as a post office, pharmacy, delicatessen, financial products or other in-house facilities. The result is that there is limited overlap with conventional supermarkets.

2.5.8 Lidl stores offer a limited range of non-food items which typically occupy about 20% of the sales area. These items tend to be one-off specials offered on the basis of 'when it's gone, it's gone', with the range changing on a weekly basis. There is no standard or constant comparison goods range offered in store and the special items are wide ranging including anything from sports equipment to electrical items.

2.5.9 On the issue of sustainability backing British suppliers continues to be at the forefront of Lidl's plans with total investment in British food and farming businesses to hit £17bn by 2025.

2.5.10 Since 2016, Lidl has reduced its food waste by almost half (43%). This means it is well on track to hit its 50% reduction target by 2030. Providing more meals to charities - including over 6 million in 2022 which surpasses the discounter's target - has helped reach this milestone. In 2022, Lidl also prevented nearly 9,000 tonnes of food waste through the sale of 1.7 million 'Too Good to Waste' boxes. Reducing other forms of waste has also been a key priority and 95% of Lidl's own-brand packaging is now recyclable, reusable, renewable or refillable.



- 2.5.11 Overall, Lidl has cut the amount of plastic packaging across its own-brand ranges by 29% since 2017 - with its sights set on achieving a 40% reduction by 2025. Through its partnership with Prevented Ocean Plastic, the discounter has also stopped the equivalent of 15 million plastic bottles from entering the ocean.
- 2.5.12 With over 90% of Lidl's carbon emissions coming from its supply chain and use of its products, Lidl is also working closely with suppliers on carbon reduction projects. The discounter has partnered with The Rivers Trust and is funding three water catchment projects (increasing to nine by 2025) to mitigate risks in the supply chain.
- 2.5.13 Meanwhile, as of February 2023 45% of Lidl's British fruit and veg suppliers were LEAF Marque certified - a gold standard in sustainable farming - meaning they have robust water and nature conservation plans in place. This figure is due to reach 100% in 2024.
- 2.5.14 All of these measures support Lidl's sustainability goals and its commitment to helping customers in their day-to-day lives; that's why Lidl also led the way in pledging to halve the environmental impact of its customers' shopping baskets by 2030, through the WWF's Retailers' Commitment for Nature.
- 2.5.15 Principles of sustainability are engrained in Lidl's operation from the efficient construction and standardised fit-out elements enabling rapid store construction, to energy saving measures including energy efficient building materials, low energy consumption lighting, motion detectors and automatic 'power down' lighting, electricity and heating in the evenings.
- 2.5.16 Staffing levels have yet to be finalised, however based on existing Lidl's elsewhere the proposed store is likely to provide up to 40 FTE job opportunities. Lidl always seek to source labour locally and provide management opportunities for staff, the company's philosophy being to provide all their employees with opportunities for developing and progressing their careers with the company, with the longstanding corporate strategy being to promote from within the business.

2.6 Pre-application Consultation and Engagement

- 2.6.1 The application submission follows discussions with Caerphilly Borough Council Officers, initiated in November 2023 whereby the draft proposals were submitted to the LPA for comment. The formal feedback from the LPA included the following points:
- To be compliant with adopted and emerging planning policy allocations, the proposal should seek to integrate a mixed of uses beyond one retail user.
 - Acknowledgement that the site is an edge of centre location and any future application should be supported by a Needs and Sequential Assessment.
 - The site is located within Flood Zone C1 (Flood Zone 3 – TAN15 Defended Zone on the emerging Flood Maps) and any future application will need to be supported by a Flood Consequences Assessment.



- Highway officers whilst raising no objections to the proposals in principle raised concerns with a vehicular access onto the link road (B4591) between the two roundabouts would not be acceptable. The Officer also noted that the proposed parking provision was over and above the Council's parking standards.
- Officers considered that there are placemaking opportunities that should be further explored including providing accessible pedestrian/cycle links along the River Ebbw and into the town centre and opportunities to provide a corner / active frontage along Commercial Street.

2.7 Statutory Planning Application Consultation

- 2.7.1 The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 ("the 2016 Order") sets out the requirements to undertake pre-application consultation (PAC) in respect of all planning applications for major development.
- 2.7.2 This draft Planning & Retail Statement is submitted in the context of the PAC requirements. On completion of the PAC process, a PAC report will be submitted with the full planning application in due course.
- 2.7.3 The PAC report will detail the pre-application consultation undertaking including documenting responses to the pre-application consultation; and how feedback is addressed in the application proposals.



3.0 Planning Policy Context

3.1 The Development Plan

3.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise.

3.1.2 The Development Plan for this site comprises:

- Future Wales – The National Plan 2040 (published February 2021)
- The Caerphilly County Borough Council Local Development Plan (adopted November 2010)

3.2 Future Wales: The National Plan 2040 (February 2021)

3.2.1 Future Wales is the Welsh Government's highest tier of development plan in Wales. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole. Under policy one of this document, 'where Wales will grow', the Welsh Government supports sustainable growth in all parts of Wales.

3.2.2 The Welsh Government (WG) has adopted a 'Town Centre First' approach and this is explored under Policy 6, where it is mentioned that significant new retail, facilities must be located within town and city centres. Subsequently, developments of a 'significant' scale can broadly be defined as where the facility will serve a town, city or region-wide catchment. Planning authorities are encouraged to take a similar approach for smaller developments. A sequential approach must be used to inform the identification of the best location for these developments.

3.2.3 The supporting text of Policy 6 notes that "This policy applies to developments of a significant scale, which can broadly be defined as where the facility will serve a town, city or region-wide catchment."

3.2.4 Policy 9 'Resilient Ecological Networks and Green Infrastructure' notes the importance of enhancing ecosystems, biodiversity and green infrastructure when considering approaches to development proposals through nature-based methods.

3.2.5 Policy 12 'Regional Connectivity' refers to improving the connectivity in urban areas by integrating active and sustainable travel and public transport. Active travel is encouraged in all new developments in the form of walking and cycling to promote a reduction in the reliance of the private car.

3.3 Caerphilly Local Development Plan (to 2021)

3.3.1 The Caerphilly County Borough Council adopted their LDP in November 2010. It forms part of the statutory development plan alongside Future Wales - The National Plan 2040. The LDP is



intended to form the adopted development plan for Caerphilly Borough up to 2021 and is therefore now time expired.

3.3.2 The LDP identifies Risca as an important key settlement within the Southern Connections Corridor (SCC) and is classed as a Principal Town.

3.3.3 The LDP advises that whilst there is a need for Risca to continue to capitalise on its proximity to Newport and Cardiff and exploit the economic opportunities that this can bring, there is also a need to ensure that these areas do not ‘over-heat’ to the extent that economic progress is outweighed by negative environmental effects of over development. The priority and emphasis will be on the redevelopment of existing sites and not on the release of any substantial new greenfield land. The Plan will need to ensure, however, that all the brownfield sites are not developed for housing to the detriment of the important employment, retailing and service roles played by the local centres (para. 3.166).

3.3.4 The LDP Proposals Map shows the site is located within the settlement boundary (Policy SP5) and immediately abutting the town centre boundary (Policy CM1.4). The site is also shown as being allocated for housing (48 units) under Policy HG1.54. Immediately to the south is a site of importance for nature conservation (SINC) (Policy NH3.12). An extract from the LDP Map is provided Figure 3.1.

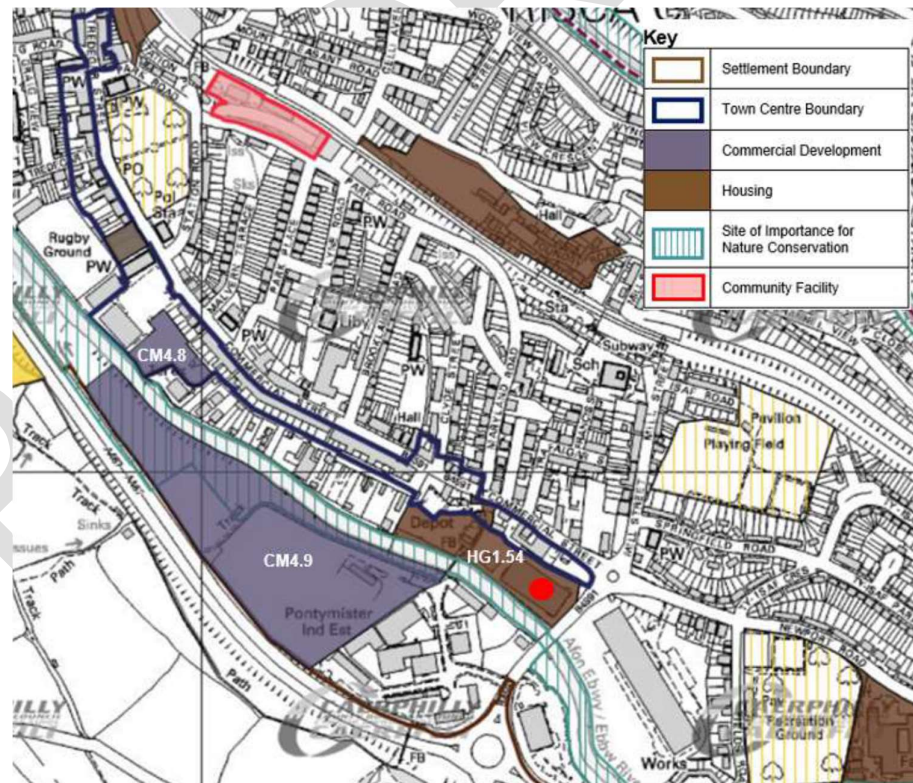


Figure 3.1: LDP Proposal Map Extract



3.3.5 The policies of relevance to the proposed development are discussed in further detail below.

3.3.6 Policy HG1 Allocated Housing Sites

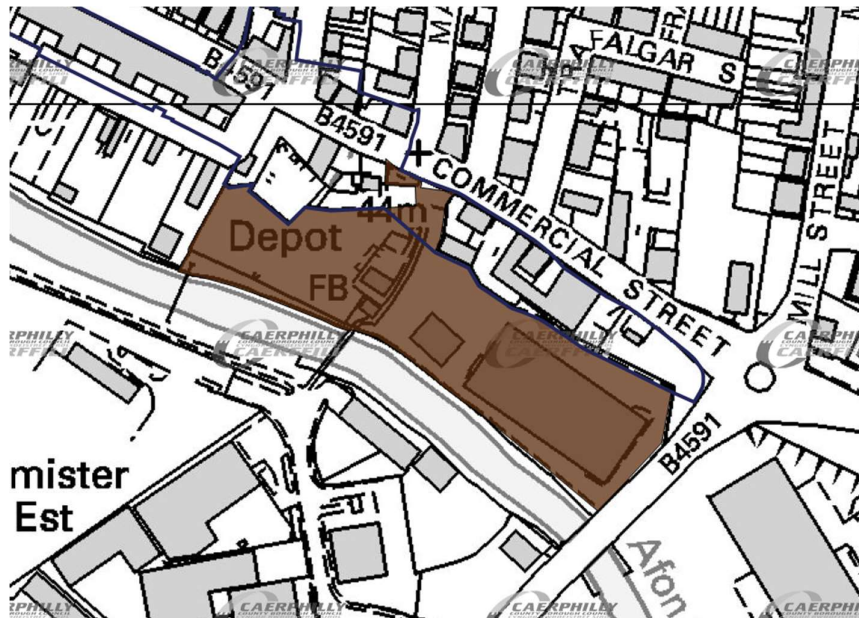


Figure 3.2 - Adopted LDP Proposals Map extract – the application and land adjoining forms site ref HG1.54 (brown), allocated for a mix of uses. The site abuts the Principal Town Centre Boundary (outlined in blue)

3.3.7 Land has been allocated for housing across the Southern Connections Corridor. The application site forms part of allocation HG1. 54 (eastern part of land adjacent to River Ebbw, Pontyminster) in the adopted (albeit time expired) LDP. The allocation measures c.1.38ha approx. in total. The LDP states the allocation of sites for residential development is important in ensuring sufficient land is available to meet future population requirements.

3.3.8 Paragraph 3.200 of the LDP states land allocated under this policy includes:

- Sites with planning consent for housing or for a mix of uses incorporating housing as of 1st April 2007 (in some cases subject to the signing of a Section 106 Agreement).
- New sites that have been identified as suitable for residential development or for a mix of uses including housing as a result of a robust candidate site assessment process.

3.3.9 LDP Appendix 7 sets out that site HG1.54 comprises the former public car park and nursery to the rear of the Risca House pub. The site, along with land to the west of the river, was subject to a planning application for a mix of uses including residential development (planning ref. 06/0472/OUT). As of 1stApril 2007 the application had been deferred subject to a S106 agreement. The LDP states the Environment Agency (at that time) had no objection to the application as flood risk and consequences could be acceptably managed. Should a new application be submitted on the site a new Flood Consequences Assessment would be needed.



- 3.3.10 A contribution towards play and recreation space improvements at Tredegar Park, Pontymister Welfare Ground and Ty Isaf Recreation Ground would be required as part of any future development.
- 3.3.11 **Policy SP3 Development Strategy** – Development in the Southern Connections Corridor advises that development proposals in the SCC will promote sustainable development that:
- A. Uses previously developed land within settlement limits
 - B. Reduces car borne trips by promoting more sustainable modes of travel
 - C. Makes the most efficient use of the existing infrastructure
 - D. Has regard to the social and economic function of the area and
 - E. Protects the natural heritage from inappropriate forms of development
- 3.3.12 **Policy SP4 Settlement Strategy** – the LDP states the Council will support existing settlements, which will be enhanced based on their role and function in the settlement strategy. Designated Principal Towns include Risca/Pontymister in the Southern Connections Corridor.
- 3.3.13 **Policy SP5 Settlement Boundaries** - advises that the Plan defines settlement boundaries in order to:
- A. Define the area within which development would normally be allowed, taking into account material planning considerations.
 - B. Promote the full and effective use of urban land and thus concentrate development within settlements.
 - C. Prevent the coalescence of settlements, ribbon development and fragmented development
 - D. Prevent inappropriate development in the countryside
- 3.3.14 **Policy SP6 Place Making** seeks to ensure that development proposals contribute to creating sustainable places by having full regard to the context of the local, natural, historic and built environment and its special features.
- 3.3.15 **Policy SP17 Promoting Commercial Development** advises that the Council has made provision for the development of 29.3 hectares of commercial sites, and identified five principal town centre boundaries, two primary retail areas, three commercial opportunity areas and two retail warehouse parks, in order to enhance the commercial sector in terms of service provision and employment.
- 3.3.16 **Policy SP21 Parking Standards** states in order to implement the Parking Standards laid out in the CSS Wales Parking Standards 2008, the Council will identify Parking Zones. The site is considered to sit within parking Zone 2 (town centre or city fringe) and Zone 3 (urban).



3.3.17 **Policy CW15 General Locational Constraints** - Development proposals will be considered against the following criteria where they apply:

A - Development proposals will not be permitted if they prejudice the implementation of wider comprehensive redevelopment or constrain the development of any adjacent site for its allocated land-use

B - Within settlement boundaries proposals for all types of development accord with the role and function of the settlement within which they are located,

3.3.18 **Policy CW16 Locational Constraints** - Retailing explains that outside of the defined Principal Town Centres proposals for new retail stores or for additional retail floorspace will only be permitted where:

A. The vitality and viability of nearby Principal Town Centres will not be undermined, taking into account the cumulative effects of other approved retail developments, recently completed developments and Plan commitments.

B. The proposal would not undermine the Council's retail strategy, a Town Centre Action Plan or any regeneration plans that the Council has formally approved, or

C. The proposal is (i) a new retailing unit of 1000m² or less in size, or the change of use of such a size, and (ii) to serve neighbourhood needs, or is ancillary to another commercial use.

3.3.19 **Policy CM1** defines boundaries for the principal town centres in the SCC which includes Risca. The supporting text to this policy advises that retail policies have been formulated which aim at protecting and enhancing the retail vitality and viability of principal town centres. The LDP goes on to advise that the main thrust of the retail strategy is to continue to expand overall retail provision in the County Borough through the growth of high quality shopping centres which retain the best existing features combined with provision for new shopping investments and environmental enhancement. Therefore, policies seek to focus retail developments within existing shopping centres and defined edge of centre locations to accommodate specific types of stores (Paras 3.208 and 3.209).

3.3.20 **Policy CW1 Sustainable Transport, Accessibility and Social Inclusion. Development** proposals that are likely to generate a significant number of trips will only be permitted provided:

A Walking and cycling are modes of travel which have been actively encouraged for short trips to and within the development and to nearby services and facilities, including public transport nodes, through the provision of appropriate infrastructure

B Provision has been made for ease of cycling, including secure bike storage and cyclist facilities

C It has been demonstrated that where a significant number of freight trips will be generated, the least environmentally damaging route will be utilised

D The use of Green Travel Plans has been encouraged, where appropriate



3.3.21 **Policy CW2 Amenity** Development proposals must have regard for all relevant material planning considerations in order to satisfy the following requirements:

A There is no unacceptable impact on the amenity of adjacent properties or land

B The proposal would not result in overdevelopment of the site and / or its surroundings

C The proposed use is compatible with surrounding land-uses and would not constrain the development of neighbouring sites for their identified land-use

D Where applicable, the viability of existing neighbouring land uses would not be compromised by virtue of their potential impact upon the amenity of proposed new residential development

3.3.22 **Policy CW3 Design Considerations – Highways.** Development proposals must satisfy the following highways requirements:

A The proposal has regard for the safe, effective, and efficient use of the transportation network

B The proposal ensures that new access roads within development proposals are designed to a standard that:

i Promotes the interests of pedestrians, cyclists and public transport before that of the private car, and

ii Safely and effectively accommodates the scale and nature of traffic, which those roads are intended to serve

C Parking, appropriate servicing and operational space have been provided in accordance with the CSS Wales Parking Standards 2008

D Where access onto a highway is required the proposal takes account of the restrictions relevant to the class of road as designated in the road hierarchy ensuring movements and speeds are controlled through appropriate design, in order to ensure highway safety and amenity.

3.3.23 **Policy CW4 Natural Heritage Protection.** Development proposals that affect locally designated natural heritage features, will only be permitted:

A Where they conserve and where appropriate enhance the distinctive or characteristic features of the Special Landscape Area (SLA) or Visually Important Local Landscape (VILL).

B Within, or in close proximity to sites designated as Sites of Importance for Nature Conservation (SINC), Local Nature Reserves (LNR), Regionally Important Geological Sites (RIGS), Green Corridors, or Local Priority Habitats and Species, where proposals either:

i Conserve and where appropriate enhance the ecological or geological importance of the designation, or



ii Are such that the need for the development outweighs the ecological importance of the site, and where harm is minimised by mitigation measures and offset as far as practicable by compensation measures designed to ensure that there is no reduction in the overall value of the area or feature.

3.3.24 **Policy CW5 Protection of the Water Environment.** Development proposals will only be permitted where they do not have an unacceptable adverse impact upon the water environment, and where they would not pose an unacceptable risk to the quality of controlled waters (including groundwater and surface water).

3.3.25 **Policy CW6 Trees, Woodland and Hedgerow Protection.** Development proposals on sites containing trees, woodlands and hedgerows, or which are bordered by one of more such trees or hedgerows, will only be permitted provided that:

A Where arboricultural surveys are required, they are submitted and approved, including any mitigation, compensation or management requirements, as part of the planning application.

B Root systems will be retained and adequately protected for the duration of all development activity on site.

C Development proposals have made all reasonable efforts to retain, protect and integrate trees, woodlands or hedgerows within the development site.

D Where trees, woodlands or hedgerows are removed, suitable replacements are provided where appropriate.

3.3.26 **Policy NH3 Sites of Importance for Nature Conservation** are identified and will be protected at locations including the river Ebbw.

3.4 Other Material Considerations

Planning Policy Wales Edition 12 (February 2024)

3.4.1 PPW 12 sets out the land use planning policies of the Welsh Government and is supported by a series of Technical Advice Notes (TANs). In accordance with the Well-Being of Future Generations (Wales) Act 2015, the primary objective of PPW, as set out at Paragraph 1.2, is “to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales”.

3.4.2 Key sections relevant to the proposals include:

3.4.3 **Previously Developed Land** - PPW 12 indicates that previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development (para 3.55) and one of the national sustainable placemaking outcomes involves prioritising the use of previously developed land and existing buildings.



- 3.4.4 **Placemaking** - PPW sets out that, to maximise well-being and the creation of sustainable places, the concept of 'placemaking' should be at the heart of the planning system. Paragraph 2.8 advises that development proposals "must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle". Paragraph 2.9 goes on to clarify that "The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making".
- 3.4.5 **Needs Test** – PPW 12 advises that when determining planning applications for retail uses, planning authorities should first consider whether there is a need for additional retail provision (para. 4.3.14). Paragraph 4.3.15 goes on to explain that need may be quantitative or qualitative.
- 3.4.6 **The Sequential Test** - PPW 12 indicates Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development. It highlights that "the sequential approach applies to retail and all other uses complementary to retail and commercial centres". Paragraph 4.3.18 clarifies that by adopting a sequential approach first preference should be to locate new development within a retail and commercial centre defined in the development plan hierarchy of centres.
- 3.4.7 **Retail Impact Assessment** - Paragraph 4.3.26 advises that all retail planning applications or retail site allocations of 2,500 sq. m or more gross floorspace that are proposed on the edge of, or outside, designated retail and commercial centres should, once a need has been established, be supported by a retail impact assessment.
- 3.4.8 **New Out-of-Centre Developments** - Paragraph 4.3.20 states that "New out-of-centre retail developments or extensions to existing out-of-centre developments should not be of a scale, type or location likely to undermine the vibrancy, attractiveness and viability of those retail and commercial centres that would otherwise serve the community and should not be allowed if they would be likely to put development plan retail strategy at risk".
- 3.4.9 **Economy & Jobs** - Section 5 of PPW recognises the role that retailing plays in supporting the economy. Paragraph 5.4.1 states that "For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. Paragraph 5.4.2 goes on to confirm that "Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services".



- 3.4.10 **Healthy Lifestyles** – Promoting healthier places forms a key Well-Being Goal set out in PPW. Paragraph 3.22 states LPA’s “...should develop and maintain places that support healthy, active lifestyles”. Paragraph 3.20 highlights “Disadvantaged and deprived communities tend to be disproportionately affected by health problems”.
- 3.4.11 **Accessibility** - PPW sets out that the planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which for example: “are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car” (Paragraph 4.1.10). Paragraph 4.1.32 continues to indicate that: “Planning authorities must ensure new housing, jobs, shopping, leisure and services are highly accessible by walking and cycling”.
- 3.4.12 **Green Infrastructure (GI)** - PPW explains that GI plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in. Paragraph 6.2.4 advises that the planning system must maximise its contribution to the protection and provision of green infrastructure assets and networks as part of meeting society’s wider social and economic objectives and the needs of local communities. PPW further advises that a green infrastructure statement should be submitted with all planning applications and that this will be proportionate to the scale and nature of the development proposed describing how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi functional outcomes which are appropriate to the site in question.

Supplementary Planning Guidance

- 3.4.13 Relevant guidance can be found in Supplementary Planning Guidance; of particular relevance is the following.
- Risca and Pontymister Town Centre Action Plan (adopted 2014).
- 3.4.14 The Risca Town Centre Action Plan (RTCAP) was adopted in June 2014 to 2019 and is now time expired. It was intended to provide an update of the 2002 Risca and Pontymister Town Centre Action Plan, and context for regeneration of the town centre over the 5-year period to 2019.
- 3.4.15 The site is, amongst others, identified as a Key Opportunity Area in the RTCAP. It forms part of site ref: A2 Eastern part of land adjacent to River Ebbw, Pontymister. The site is described as being located at the southern entrance to Risca and being allocated for residential purposes. It acknowledges the site as being allocated for housing in the LDP (HG1.54) however also outlines the site as being granted planning permission in 2011 (11/0446/FULL) for a mix of uses including a care home, retail (A1), A3 food and drink and office use.



3.4.16 The RTCA recognises that to date (2014) this site had not been developed. It posits factors for this including the economic downturn, which has made the economic development of this site marginal. The RTCAP states that because of the flood alleviation scheme progressed at the site it will become increasingly viable and thus more attractive to the private sector.

3.4.17 The care home permission expired unimplemented in 2016.

3.4.18 The site satisfied at that time the requirements of TAN 15 and the development of the site is not contingent upon the flood mitigation works being carried out by Natural Resources Wales.

Lower Ebbw and Sirhowy Valleys Masterplan (Approved October 2022). Project B2: Former Bird's Site, Commercial Street, Pontyminster.

3.4.19 The masterplan sets out the future development and regeneration opportunities proposed for the Lower Ebbw and Sirhowy Valleys. The masterplan states *"It is flexible and can adapt to changing economic and market conditions and meet the requirements and aspirations of both the private and public sectors through regular review. The masterplan is designed to be reviewed every five years..."*

3.4.20 The application site sits within an identified Opportunity Area (Ref B2: Former Birds Site, Pontyminster). It highlights that the site is located to the rear of Commercial Street, directly at the southern entrance of the town centre and within the main commercial core of the town. It is a visually prominent brownfield site jointly owned by the Council and a private developer (the Bird Group of Companies).

3.4.21 The Masterplan states the Area B2 measures c.1.36ha and comprises of three distinct parcels of land situated adjacent to each other. To the west of the Bird-owned land parcel sits a large -at brownfield site that is owned by Caerphilly County Borough Council (CCBC). A smaller parcel of CCBC land at the north-eastern corner of this site consists of a -at landscaped area. The site formerly housed a factory, public car park and nursery (now demolished). Part of the site is to be reinstated as a car park.

3.4.22 The Masterplan advises the site is constrained by flood issues and recognises this could curtail the range of uses that could be adopted on the site. It states the Council is seeking funding to undertake a study to determine the most appropriate redevelopment opportunities to achieve the overall aim of creating an attractive, sustainable and 'fit for purpose' tourism-focused town centre development that will complement and add value to Cwmcarn Forest Drive and the Monmouthshire and Brecon Canal.

3.4.23 Development principles listed are:

- Significant well-being and employment opportunities for a range of enterprises and sectors, including retail, leisure, tourism and recreation.
- Creation of a major new regional visitor destination point.



- Leisure-focused development to boost the town centre catchment and help strengthen the existing night- time economy and add value to the visitor experience.
- Stimulate wider commercial development on other sites within the town centre.
- To assist in developing the tourism offer in the town, linking it to both the Canal and nationally important Cwmcarn Forest attraction.

3.4.24 Other relevant Supplementary Guidance includes:

- LDP5: Car Parking Standards (Revision No. 2) adopted January 2017.
- LDP6: Building Better Places to Live (Revision No. 3) adopted January 2017.

Technical Advice Notes

- **Technical Advice Notes 4: Retail and Commercial Development (2016)** - TAN4 reflects the ‘town centre first’ approach of the PPW. TAN4 explains that retail developments should be assessed against a range or impact criteria (paragraph 8.3).
- **Technical Advice Note 18: Transport (2016)** - explores the transport aspect of planning developments and in terms of this application, it is important to take note that “maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should allow developers the discretion to reduce parking levels” (paragraph 4.13).
- **Technical Advice Note 23: Economic Development (2014)** - explores the benefits of economic growth and that it defines economic development as development that generates wealth. It is important that LPAs recognise the need to “guide economic development to the most appropriate locations, rather than prevent or discourage such development” (paragraph 1.2.5).

3.5 2nd Replacement Local Development Plan 2020 – 2035 (2RLDP)

3.5.1 The Council are currently in the process of preparing the 2nd Replacement Caerphilly County Borough Local Development Plan (for the period to 2035). At the time of writing, consultation on the Pre-Deposit (Preferred Strategy) is currently underway, until 26 February 2025. A Third Call for Candidate Sites is also currently out for consultation.

3.5.2 The Adopted LDP, whilst time expired, continues to provide the policy framework for the determination of planning applications while the 2nd Replacement Caerphilly County Borough Local Development Plan 2020 - 2035 (2RLDP) is being prepared. Adoption of 2RLDP is currently anticipated for August 2027



4.0 Assessment of Existing Provision

4.1 Introduction

4.1.1 This section of the assessment presents an analysis of the vitality and viability of centres within the catchment area of the proposed development. The following analysis draws upon established sources of retail data (such as Experian GOAD) and our own site visits/surveys and observations.

4.1.2 Firstly, we consider the Primary Catchment Area (PCA) and then provide an analysis of the vitality and viability of surrounding PCA based centres.

4.1.3 The section provides a 'health check' of nearby centres principally by assessing them against the measures of town centre vitality and viability identified in Technical Advice Note 4: Retailing and Commercial development.

4.2 The Primary Catchment Area (PCA)

4.2.1 The PCA is the area in which the proposed development is anticipated to draw the majority of its trade. The extent of the PCA varies according to factors such as:

- the nature of the settlement involved (PCAs for market towns in predominantly rural areas would generally be wider than those within or in close proximity to the built-up areas of larger towns or cities);
- the density of residential development in the vicinity of the site;
- the prominence and accessibility of the proposed development in relation to the main road network and to public transport provision; and
- the location of the development in relation to established competition.

4.2.2 The PCA is essentially considered to broadly comprise Zone 2 (Risca) of the Council's Retail Capacity Study (2022). Inevitably some trade is likely to be drawn from outside the PCA however this is only likely to form a very small proportion of the overall turnover of the development. The extent of the PCA is shown on the plan attached at **Appendix B**.



4.3 Designated Centres

4.3.1 The focus of this healthcheck assessment is Risca/Pontymister Centre. In accordance with PPW and TAN 4, a health-check assessment has been carried out having regard to accepted vitality and viability indicators.

4.4 Risca/Pontymister Town Centre

4.4.1 Retail Representation

4.4.2 Risca / Pontymister Principal Town Centre is located adjacent to the north of the application site. Risca is a small retail centre that runs along Commercial Street and Tregedar Street and is on the border of Risca and Pontymister. The centre has a strong presence of convenience shops and retail services.

4.4.3 Diversity Of Uses

4.4.4 CarneySweeney carried out an assessment of the composition of the town centre in September 2024 based on the extent of the centre outlined in Caerphilly’s Local Development Plan (2010). A plan of Risca / Pontymister Principal Town Centre is shown at **Appendix B** for reference.

4.4.5 The composition of units within Risca / Pontymister is set out in the table below. The figure provides a comparative view of different services within the centre against the UK average.

Table 4.1: Risca Centre Composition of Uses

Sector	August 2022	%	CS Survey September 2024		UK Average Sept 2024 %
			No. of Units	%	
Convenience	10	9.52	10	10.10	9.32
Comparison	19	18.10	12	12.12	26.30
Retail Services	29	27.62	33	33.33	15.97
Leisure Services	22	20.95	21	21.21	25.79
Financial & Business	12	11.43	9	9.09	8.30
Vacant	13	12.38	14	14.14	14.11
Total	105	100	99	100	100

Source: 2022 figures CCBC Study, Lichfield, 2024 figures CS survey

4.4.6 In food retail terms the centre is principally served by Lidl’s existing Commercial Street store. The Centre shows a healthy mix of takeaway services, salons and grocers (chain and independent). The centre totals 99 units and the highest represented category in the centre is



retail services (33.33%), which is much higher than the UK average of 15.97%. Convenience and Financial & Businesses are also higher than the UK average.

Vacancies

4.4.7 There were fourteen identified vacant units. The vacancy rate at 14.14 is in line with the UK average of 14.11 and does not give to undue concern.

Accessibility

4.4.8 The town centre is easily accessible by both public and private transport. The centre is well located and can be accessed from B4591.

4.4.9 The centre is served by various bus services that are along the B4591 providing frequent services to surrounding areas including Newport City Centre, Blackwood, Brynmawr and Tredegar. The retail centre is also served by the Risca and Pontymister train station. The train service stops at Newport train station and surrounding areas including Llanhilleth & Ebbw Vale Town.

4.4.10 Most of the pavements throughout the centre are well maintained. Some of the pavements in the retail centre were narrow. Although, some parts of the pavements also have sufficient space for less abled users. There are no dedicated cycle lanes and cycle stands identified during the site visit and this makes the town centre less accessible for cycle users.

Pedestrian Flows

4.4.11 In respect of pedestrian activity levels, the busiest observed areas are at the One Stop shop and Library. Due to the number of the vacancy units the north of the centre (31-35 Tredegar St) it was observed to have a low footfall level.

4.4.12 Notwithstanding this, the town centre demonstrated good levels of activity, and the centre was perceived to be busy with good levels of activity throughout the day.

Perception of Safety

4.4.13 Throughout the site visit, Risca / Pontymister Principal Town Centre felt safe. Public areas are monitored by CCTV cameras. In terms of lighting, the centre appears to be well furnished with street lighting to help provide a safe environment at night.

Environmental Quality

4.4.14 The retail centre is generally tidy and well maintained. Benches were present around the retail centre, which creates a welcoming environment. Hanging baskets were present on the lamppost throughout the retail centre, which lifts the overall quality and amenity of the public realm. There are no major litter or graffiti issues observed in the town centre. Overall, the centre's environmental quality is considered to be good.



4.5 Summary

- 4.5.1 In summary, Risca/Pontymister Principal Centre appears to be in good health, is easily accessible, perceived to be safe, and mostly well maintained. The Centre exhibits a strong mix of uses, with a strong retail offer. The centre has a vacancy rate in line with the national average which does not give rise to undue concern. The centre is considered to be vital and viable in meeting local retail/service needs. An improved Lidl store will serve to further bolster the centre and drive visits and linked trips.

PAC DRAFT



5.0 The Need for the Proposed Development

5.1 Introduction

- 5.1.1 This section of the report assesses the retail ‘need’ for the development, in accordance with guidance provided in PPW, TAN 4 and the adopted LDP.
- 5.1.2 The Welsh Government does not prescribe any particular methodology for undertaking need assessments, and it is up to each local planning authority to be satisfied with quantitative retail need evidence in policy making or the development management process. Local planning authorities and developers should therefore ensure assessments are prepared in a clear, logical and transparent way with the use of robust and realistic evidence. (para 6.3, TAN4).
- 5.1.3 There are two acknowledged indicators of need: quantitative need – a statistical/numerical based assessment of need for additional floorspace; and qualitative need – an assessment of other nonnumerical considerations. Qualitative considerations can include (but are not limited to) addressing issues associated with overtrading, improving accessibility, widening choice of facilities and the redistribution of trade. Weight given to qualitative need is dependent on local circumstances.
- 5.1.4 Whilst an element of precedence is apportioned to quantitative need in PPW, it states that qualitative need and other factors are material considerations when considering need, with the weight apportioned being a matter for the decision-maker in each individual case. It is within the gift of the decision maker to apportion weight to qualitative indicators of need and other material considerations.

5.2 Quantitative capacity

- 5.2.1 The below table provides simple convenience expenditure capacity analysis within the PCA at 2030 i.e., the design year of the proposed store. The data outlined is provided in detail in **Appendix D** of this Statement.

Table 5.1 Capacity for additional Convenience Floorspace to 2030, Risca (Zone 2)

	2025	2030
[1] Available Convenience Expenditure in PCA (Zone 2) (£m)	73.3	72.8
[2] PCA derived turnover of existing stores in PCA (Zone 2) (£m)	39.2	38.9
[3] Turnover uplift of proposed development (£m)	0.0	3.3
[4] Turnover of Convenience Retail Commitments in PCA (£m)	0.0	0.0
[5] Total PCA turnover (£m)	39.2	42.1
[6a] PCA convenience expenditure capacity (£m)	34.2	30.6
[6b] Retained market share of PCA expenditure (%)	53.4	57.9



Notes

See Table 7 Appendix D

[1] derived from Table 5 Appendix D

[5] = [2]+[3]+[4]

[6a] = [1]-[5]

[6b] = [5] as a % of [1]

- 5.2.2 It can be seen from the above table existing stores are assessed to draw turnover of c.£39.2m (row 2) from the PCA (Zone 2) compared to an available PCA (Zone 2) expenditure of c.£73.3m (row 1). This indicates a significant proportion of available expenditure in the PCA is being spent beyond the PCA in an unsustainable manner. It indicates there is 'capacity' for additional floorspace in the PCA to meet this locally available expenditure and increase Risca's self-containment. Therefore, it is entirely sensible that a modest quantum of additional floorspace is provided at an already well established, but better equipped local store (albeit relocated c.480m south), such as that proposed, to meet this identified need and counteract this 'leakage'. The table shows through the additional provision of floorspace within the PCA the local market share of expenditure will be increased to a more sustainable level.

5.3 Qualitative Considerations

- 5.3.1 Qualitative need is also an important consideration. It reflects the increasing recognition of the wider economic, social and environmental considerations in determining planning applications for retail proposals. It is of particular relevance in securing accessible, efficient, competitive and innovative retail provision which, in turn will allow increased investment and stimulate job creation.
- 5.3.2 Qualitative need considerations can include (but are not limited to) addressing issues associated with existing store operational inefficiencies/ deficiencies, improving accessibility and counteracting unsustainable shopping patterns.
- 5.3.3 When considering 'need' it is crucial to note in this instance that the proposal is for an improved store. The fact that Lidl is taking the multi-million-pound commercial investment decision to relocate at Risca/Pontymister Centre is a very strong indication itself of
- a) the strength of the existing customer base;
 - b) the importance of this store in meeting local needs; and
 - c) the pressing need for improved local facilities.

Meeting Local Consumer Need

- 5.3.4 Lidl's existing Risca store is one of Lidl's early generation stores. The operational and customer requirements were very different then than they are today. Lidl (and the Risca store's) growing popularity since first opening means the store as currently sized and arranged is no longer fit



for purpose; it is no longer able to accommodate Lidl's operational format which has evolved over the years as the company's popularity has grown.

- 5.3.5 The store's age/format is leading to store operational issues e.g. limited space for display of product range. The rationale for the proposed store is clear; an improved store is required to ably meet local need. Obtaining planning consent will ensure that Lidl continues to be able to suitably serve local needs from what is a well-established existing retail destination. The enhanced store will help improve store operations and Lidl's ability to compete. Overall, an improved customer experience will be achieved and this improved competition will benefit local consumers.
- 5.3.6 It is important to note the smaller format Limited Assortment Discounters (LAD) such as Lidl operate from far smaller stores than is typical of the large format 'big four' operators. It is now widely accepted that smaller format LADs have become increasingly popular in the last decade. Whilst the adequacy of existing provision is often assessed by local authorities in quantitative capacity terms, the effect of the increasing popularity of existing LADs and the qualitative issues that arise are typically overlooked. In scenarios such as this, where customer demand means the smaller, early Lidl stores are no longer capable of meeting local need, Lidl typically seeks to deliver enhanced stores. This will ensure a high level of customer experience can be maintained at Risca Centre.
- 5.3.7 At 1,334sqm net in total the proposed store remains modestly scaled by supermarket standards. Notwithstanding this, it comprises the latest generation of Lidl store, providing ancillary staff/welfare facilities, a manager's office and customer toilets etc. Its delivery will be of direct benefit to both staff and customers alike. The store and site layout are more spacious than the existing store to be replaced and is better equipped to cater for its shoppers.
- 5.3.8 Chapter 10 of PPW advises that wherever possible retail provision should be located in proximity to other commercial businesses, facilities for leisure, community facilities and employment. Whilst edge of centre, this location is well-established and popular as a retail destination. This 'symbiosis' may not be able to be replicated elsewhere if permission was withheld. The proposals seek to make the most efficient use of a brownfield site abutting the current Principal Centre boundary (sequential matters are considered in the following chapter). Delivery of an improved store allows redevelopment of the existing site and could also serve as a catalyst for further local development, and will likely boost investor confidence.

5.4 Summary

- 5.4.1 Quantitative and qualitative need for the proposed development has been demonstrated. Improved retail provision will help counteract unsustainable travel and will ensure local needs



are met locally in accordance with PPW's sustainable development principles and placemaking objectives.

5.4.2 Accordingly, in respect of PPW guidance, need for the proposed development has been demonstrated.

PAC DRAFT



6.0 The Sequential Approach to Site Selection

6.1 Introduction

6.1.1 The general requirements of the sequential approach to site selection are set out at paragraphs 4.3.18 to 4.3.24 of PPW 12. In summary, the sequential approach requires that all potential suitable and available town centre options, and then edge of centre options, are thoroughly assessed before out-of-centre sites are considered for key town centre uses. The approach requires pragmatism and flexibility from local planning authorities, developers and retailers alike. The onus of proof that more central sites have been thoroughly assessed rests with the developer.

6.1.2 Key considerations in carrying out the sequential test on each potential site include:

- The likelihood of the site becoming available within a reasonable period of time;
- Suitability of the site for the proposed development; and
- Viability for the proposed use.

6.1.3 This section of the report details the applicant's consideration of sequential site assessment in proposing the development. In doing so, it considers recent case law and high court judgements in regard to the application of the sequential test, particularly in regard to the need for disaggregation.

6.2 Status of the application site

6.2.1 The application site lies in an out of centre location and therefore it is necessary to consider whether there are any other sites in town-centre or edge-of-centre locations that could meet the requirement.

6.3 Application of the Sequential Approach

6.3.1 The approach adopted in this assessment is consistent with the recommendations and guidance set out in PPW and TAN4 and prevailing judicial authority regarding the application of the sequential test.

6.3.2 It is important that the sequential approach is applied in a policy and legally compliant manner. Several appeal and Court cases have helped shape application of the sequential test. The following section provides a summary of the key matters regarding the application of the sequential test including applying flexibility, "suitability" and the need to "disaggregate."

6.3.3 When looking at the suitability of potential sequential sites, flexibility should be demonstrated on issues such as format and scale. The definition of suitability is pertinent to the consideration of flexibility of format and scale. The definition was clarified in February 2012 by the Supreme



Court in *Tesco Stores v Dundee City Council*¹. Since this time the Judgment has been recognised and applied by the High Court, Secretary of State and Inspectors in England and Wales. The Dundee Judgment identifies that provided the applicant has demonstrated flexibility with regard to format and scale, the question is “*whether an alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit an alternative site.*” (Dundee, paragraph 29).

- 6.3.4 For a sequentially preferable site to be suitable, it must be “suitable for the development proposed by the applicant.” The “whole exercise is directed to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for it which is for something less than that sought by the developer.” (Dundee², paras 24 and 38); “to refuse an out-of-centre planning consent on the ground that an admittedly smaller site is available within the town centre may be to take an entirely inappropriate business decision on behalf of the developer.” (Dundee, para 28). Accordingly, the application of the sequential test is “for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so.” (Dundee, para 38);
- 6.3.5 Another English appeal decision is relevant - that of a mixed-use scheme informally referred to as *Rushden Lakes*³, which was an appeal recovered and allowed by the Secretary of State. As well as declaring the Dundee judgement of “seminal importance” (paragraph 8.44) it also noted that English policy and guidance called for flexibility to be demonstrated and for ‘available’ sites to be considered but provides no guidance on the degree of flexibility of the timescale within which a site may become available.
- 6.3.6 Similarly, neither PPW or TAN 4 asks whether such sites are likely to become available during the remainder of the plan period or over a period of years and no indication is given of the degree of flexibility required of applicants.
- 6.3.7 The *Aldergate Properties v Mansfield DC* High Court Judgment⁴ found that in applying the sequential test the identity of an applicant is not “generally” relevant but that “there are instances where identity may matter”. In this regard it is reasonable to take the position that the ‘broad type of development’ may comprise a LAD operator, rather than any foodstore or convenience store so that it is reasonable to apply the sequential test on the basis that there is only limited scope for LAD retailers to be flexible in format.
- 6.3.8 Furthermore, the appellant’s own commercial objectives are relevant to the question of suitability, even where these are site specific (*Telford Forge*⁵ appeal, para 16).

¹ *Tesco Stores Limited v Dundee City Council* (Tesco Stores Ltd v. Dundee City Council [2012] UKSC13)

² *Ibid*

³ APP/G2815/V/12/2190175 - LXB RP (Rushden) Limited v East Northamptonshire Council, June 2014

⁴ *Aldergate Properties v Mansfield DC* High Court Judgment [2016] EWHC 1670

⁵ *Telford Forge Retail Park* (Appeal Ref. APP/C3240/A/12/2172756)



6.3.9 In the Scotch Corner appeal⁶ the SoS endorsed the Inspector’s conclusion that the NPPF does not require disaggregation. This sets a baseline position where the SoS has decided disaggregation does not apply.

6.3.10 Against this backdrop of case law and recovered appeal decisions, PPW was revised in November 2016 (in the form of Edition 9 at that time). Edition 8 had previously stated, at paragraph 10.3.5:

“To maximise the opportunities for new development in centres, developers and retailers will need to be more flexible and innovative about the format, design and scale of proposed development and the amount of car parking, tailoring these to fit the local circumstances. Rather than propose developments with a mixture of large-scale retail and/or leisure uses and a large amount of car parking which can only be accommodated at single site out-of-centre or even out-of-town locations, developers are expected to demonstrate why they could not develop elements of the larger scheme on a site, or a number of sites, in more central locations with less car parking.”

6.3.11 This wording, which required disaggregation of elements of the scheme onto multiple sites was removed from PPW. Policy in Wales, therefore, does not require demonstration of a disaggregated approach (consistent with England and recent case law). It is clear, therefore that disaggregation is not a policy requirement.

6.3.12 For a site to be suitable, it would have to be a genuine “real world” alternative for the development. If the appeal were dismissed, would the developer build the development on the sequentially preferable site is the relevant question (Telford Forge appeal, para 19).

6.4 Site Search Parameters

Flexibility

6.4.1 Delivering the LAD operational model has consequences for the design and layout of the stores. A critical component of the operational model is the size and configuration of the store which supports efficient stock handling procedures and an ability to stock standard product lines in sufficient depth to minimise servicing costs.

6.4.2 The restriction that this places on the ability of Lidl to be ‘flexible’ in its format is relevant to the sequential approach. This has been accepted by the Secretary of State and Inspectors in appeal decisions relating to Lidl foodstores, and by very many LPAs in their consideration of Lidl’s applications.

⁶ APP/V273/V/15/3132873 & APP/V2723/V/16/3143678 – Land at West of the A618 Barrack Bank, Scotch Corner, Dec 2016



6.4.3 In relation to a proposal in the London Borough of Merton in 2006 the Inspector concluded (and the Secretary of State agreed) that there 'are inherent characteristics of the Lidl business model that limit the scope for flexibility'. Those characteristics were cited as:

- a store of a size that may accommodate all functions that form the business model;
- the need for a high proportion of sales space relative to storage space; and
- a need to enable efficient movement of palleted goods.

6.4.4 Subsequent decisions have reinforced these principles including, in Nov 2013 in relation to an appeal in Huntingdon, England. The Inspector noted that "the proposed foodstore and associated car parking would be designed to meet the requirements of the Lidl business model". In relation to an existing unit which the LPA thought both available and suitable for a LAD foodstore the Inspector noted Lidl's position was that it is critical to its working arrangement that a store is rectangular with wide enough aisles to be able to control the sales floor, move pallets and keep costs to a minimum. Moreover, that Lidl's business model "is not able to function without surface level car parking". Having regard to the requirement to demonstrate flexibility, and the evidence provided by Lidl, the Inspector concluded that the alternative store "would be unsuitable for use by Lidl as a LAD foodstore, particularly as there appears to me to be limited scope or space to make significant changes to the layout or size of the building".

6.4.5 For Lidl to operate its business model the physical requirement to meet the needs of the proposed development have been taken to be:

- a minimum site size of circa 0.6ha;
- a minimum floorspace of c.1,765sqm on a single level. There is no prospect for disaggregation in this instance;
- approximately 100 adjacent surface level parking spaces. A site that is able to offer adjacent surface level car parking, so that customers can easily transfer goods to their vehicles, as they can from the existing store. To have otherwise would severely impact the appeal and viability of the store;
- A site that can allow for the safe manoeuvring of customer vehicles and delivery vehicles on site;
- A prominent site with the ability to attract passing trade;
- A site that is able to offer adjacent surface level car parking, so that customers can easily transfer foods to their vehicles.; and
- Provision of a dedicated service area to the rear of the store, including the ability to accommodate HGVs (Heavy Goods Vehicles).



6.4.6 All the above are key operational and locational requirements.

Definition of Availability

6.4.7 Any sequential site needs to be available or expected to be available within a reasonable period.

6.4.8 If there is any uncertainty on a site coming forward for development, for example, there are practical/feasibility/viability issues to resolve or investment/occupier interest or funding is still to be secured, then a site cannot reasonably be considered to be available. If a potential alternative site does not satisfy the availability test it is not sequentially preferable.

6.4.9 Subject to securing permission and discharge of planning conditions the proposed development could be implemented immediately. Accordingly, for a potential alternative site being considered available in the context of the subject proposals it must be available in a timeframe that could allow a scheme to be implemented immediately. In this instance, anything beyond 3 months is not considered to be a “reasonable period”.

6.5 Sequential Site Search

6.5.1 The sequential assessment focusses on Risca Town Centre and is based on research undertaken by CarneySweeney, including site throughout 2024. This process has included:

- an analysis of adopted development plan policy documents; and
- a review of potential town centre and edge-of-centre sites/units.

6.6 Assessment of Alternative Sites

Site 1 Lidl, Commercial Street site redevelopment

6.6.1 The existing site has been considered for redevelopment incorporating land adjacent to the existing site. This adjacent parcel of land forms adopted allocation ref: CM 4.8 (Land adjacent to Lidl, Pontymister).

6.6.2 This parcel of land site is heavily vegetated and in green infrastructure terms is considered to be **unsuitable** and **unviable** for redevelopment. Moreover, the existing Lidl site is subject to its own separate application proposals for a comprehensive residential led mixed use redevelopment. Accordingly, the existing site is considered **unsuitable** and has been discounted.

Other town centre sites

6.6.3 None of the available vacant units in Risca centre are large enough to accommodate the proposed development. Indeed, all of the vacant units total just c.975sqm gross and have been discounted from the sequential search.



Table 6.1: Other town centre sites

Address	Previous Use (If Known)	Size (sq.m)	Commentary
5 Commercial St,	Musical Instruments Shop	c.70	Too small to accommodate a Lidl foodstore even when allowing for flexibility. On this basis the units are deemed unsuitable and discounted.
49 Commercial St	Appliances Store	c.50	
57 Commercial St	Butcher	c.50	
101 Commercial St	Appliances Store	c.50	
26 Tredegar St	Vape Shop	c.70	
31 Tredegar St	Unknown	c.70	
32 Tredegar St	Takeaway	c.60	
33a Tredegar St	Sandwich Shop	c.25	
33b Tredegar St	Café	c.50	
33d Tredegar St	Salon	c.55	
35 Tredegar St	Carpet Shop	c.75	
52 Tredegar St	Bank	c.240	
58-59 Tredegar St	Financial Adviser	c.40	
68 Tredegar St	Clothing Store	c.70	

6.7 Summary

- 6.7.1 The sequential search has identified no sites which can be considered available, suitable, and viable sequentially preferable alternatives in respect of the proposed development, allowing for flexibility. The proposed development is considered, therefore, to fully accord with local and national policy and guidance as well judicial and appeal authority with respect to the sequential approach.



7.0 Assessment of Impact

7.1 Introduction

- 7.1.1 This section of the report considers the potential trading effects of the proposals on Risca/Pontymister Centre.
- 7.1.2 PPW paragraph 4.3.26 advises that for development of 2,500sqm gross or more an impact assessment should accompany planning applications for main town centre uses that are not in a centre. At c.1,962sqm gross the store's total floorspace is comfortably **under the PPW threshold** whereby impact assessments are typically sought. Moreover, it is important to note from the outset of this chapter that the proposed development effectively constitutes the re-provision of existing floorspace (i.e. the existing store which will close), albeit incorporating additional floorspace as part of delivering an enhanced new store experience. In this respect the majority of the floorspace proposed is not "new" floorspace. Accordingly, this chapter focuses on the additional floorspace 'uplift' proposed i.e. **353sqm net**. The proposed additional floorspace is **well below** the PPW/TAN4 floorspace threshold whereby impact assessments are typically sought.
- 7.1.3 Notwithstanding this, following pre-application discussions with the LPA and in the interests of robustness, this section provides a proportionate impact assessment.

7.2 Methodology and evidence base

- 7.2.1 The approach adopted in this impact assessment reflects national guidance and follows a widely adopted methodological approach to quantitative assessment in terms of assessing future capacity for retail development and quantifying impact.

Step 1 - Establish catchment area, base/design years, and determine what is being assessed.

- 7.2.2 The catchment area is outlined at Appendix B. Impact is assessed up to five years from the time of the application being made (base year). The design year of 2030 has been adopted for testing impact.

Step 2 - Examine 'no development' scenario, i.e., what will happen if no development takes place.

- 7.2.3 A 'no development' scenario should be analysed. Moreover, impact assessments should not limit themselves to examining the effects of a proposal on the current position. It is relevant to consider the effect of any known commitments, and to consider the cumulative impact of the proposals.

Step 3 - Assess turnover and trade draw.

- 7.2.4 The use of available household telephone survey information to identify existing shopping patterns and catchment area derived turnover levels of existing facilities is a widely adopted and



industry accepted approach to understanding the turnover of existing facilities. In addition, the use of published evidence of sales densities derived from company accounts also provides an industry accepted approach upon which to gauge the turnover of a proposed development.

- 7.2.5 The characteristics of the development may give the best indication of where the new development is likely to draw its trade from. Trade is more likely to be drawn from similar competing facilities.

Step 4 - Assess impact on existing centres.

- 7.2.6 Set out the likely impact of the proposal clearly, along with associated assumptions and reasoning, in respect of quantitative and qualitative issues.
- 7.2.7 It is likely, if a particular facility accounts for the vast majority of expenditure currently generated in a given zone, that a similarly higher proportion of the proposal's turnover will be diverted from that facility.

Step 5 – Consider consequences of impact.

- 7.2.8 Any conclusions should be proportionate. It is important that the impacts are considered on the vitality and viability of the whole of a centre, not simply on individual facilities which may be similar to the proposed development.
- 7.2.9 The level of trade diversion is based on the generally acknowledged principles that:
- the trading effect on existing floorspace would generally be proportionate to their distance from the proposed new store. Numerous surveys of shopping patterns throughout the UK suggests that customers generally seek to go to the store that is nearest to their place of residence which can provide for their particular shopping needs; and
 - stores tend to compete on a 'like with like' basis, such that main foodstore proposals which have dedicated surface level car parking and provide a similar range of in-store customer facilities, would tend to compete directly for trade.
- 7.2.10 Accordingly, this assessment is fully in accordance with prevailing recommendations and guidance in quantifying retail impact and comprises an orthodox and industry accepted



approach to assessing impact. The statistical tables referred to in this section are provided at **Appendix D**.

7.3 Impact on Existing, Committed or Planned In-centre Investment

7.3.1 Key considerations when considering existing, committed or planned in centre investment are identified as including:

- The policy status of the investment (i.e. whether it is outlined in the Development Plan).
- The progress made towards securing the investment (for example if contracts are established).
- The extent to which an application is likely to undermine planned development or investments based on the effect on current/forecast turnovers, operator demand and investor confidence.

7.3.2 We are not aware of any known notable existing, committed or planned in-centre retail investment proposals in the catchment area upon which the proposed development may give rise to an unacceptable impact.

7.4 Impact on Allocated Sites Outside Centres

7.4.1 As outlined above retail allocations outside centres have also been considered in detail as part of sequential investigations. There are no allocated sites outside centres in the catchment area upon which the proposed development may unacceptably impact.

7.5 Cumulative Effects of the Development

7.5.1 There is no known, notable committed food retail planning commitments within the primary catchment area for inclusion as part of this assessment.

7.6 Impact on Centre Vitality and Viability and In-Centre Turnover and Trade

7.6.1 Vitality is reflected in how busy and diverse a retail and commercial centre is at different times and in different parts, and in the attractiveness of the facilities and character which draw in trade. Viability refers to the ability of the centre to attract and retain investment, not only to maintain the fabric, but also to allow for improvement and adaptation to changing needs.

7.6.2 It is widely accepted that retail uses tend to compete with their most comparable competitive facilities. For example, in an area already served by large modern convenience or comparison stores, the effects of new or improved stores are likely to fall disproportionately on the existing competing stores. Their proportionate impact on local independent retailers, for example, may be less. These accepted patterns suggest that the proposed redeveloped store will compete



predominantly on a like for like basis with other foodstores, most notably those with broadly comparable retail offers offering the greatest competition currently.

- 7.6.3 The following paragraphs assess the potential impact of the proposal on in-centre turnover, before conclusions are drawn on the impact on in-centre turnover and trade. In considering impact on in-centre trade this section draws on the assessed retail **turnover uplift** of the proposed new, larger replacement store. A detailed trading assessment of the potential impact that the proposal is likely to have on the patterns of retail expenditure in the surrounding area is then provided.

Turnover

- 7.6.4 Turnover is set out in detail in at Table 6, Appendix D. The annual turnover uplift of the proposed new store is assessed to be c.£3.3m in 2030 (excluding inflow).

7.6.5 **Expenditure**

- 7.6.6 The tables at Appendix D apply the estimates of convenience (food) expenditure per person to the resident population within the Study Area in order to outline the available retail expenditure generated over the period to 2030.

- 7.6.7 Table 3a demonstrates the underlying position is one in which available convenience expenditure is expected to remain largely constant across the Study Area (Zones 1 to 6).

- 7.6.8 In respect to comparison expenditure it is important to note Lidl's non-food offer is very modest, sold on a WIGIG basis (When It's Gone It's Gone) and typically purchased on an impulse basis. The choice of goods is constantly changing within the store and no type of comparison goods predominates at any given time. Crucially, Lidl is not, in itself, a comparison goods destination and thus the proposed store's capacity to affect local comparison shopping patterns is minimal. There is, therefore, very limited potential for Lidl's comparison goods range to impact upon any specific retailer/ centre as there is no consistency in the range of comparison retail goods that Lidl sells.

- 7.6.9 As such, the remainder of this analysis focuses on the quantitative effect of proposed additional convenience floorspace.

Trading Assessment

- 7.6.10 This section of the statement considers the potential impact that the proposal may have on the pattern of retail expenditure in the surrounding area.

- 7.6.11 Set out at Table 8 of Appendix D is an assessment of how the development will affect the projected retail turnovers of facilities within the surrounding area.

- 7.6.12 As noted earlier in this section the methodological approach employed is widely adopted and accords with guidance set out in TAN4. It involves the following steps:



- i. Establishing the existing (2025 (the base year)) expenditure pattern within the catchment/survey area, based on an identification of turnover levels of existing stores or centre derives from monies spent by households in the catchment/survey area.
 - ii. Projecting the pattern of expenditure forward to 2030 (the design year) for testing impact assuming that each location maintains its current market share of expenditure.
 - iii. Assessing the pattern of trade draw to the proposal on the basis that the redeveloped foodstore will compete predominantly like for like with other foodstores.
 - iv. Calculating the quantitative impact of the proposal, in terms of:
 - The percentage reduction in trade at each store/centre at 2030; and
 - The percentage change in retail turnover in each store/centre between 2025 to 2030.
- 7.6.13 The analysis is based on an assessment of existing stores/centre turnovers derived from the household survey underpinning the Council's own Retail Capacity Study, updated as appropriate based on the latest per capita expenditure projections derived from Experian.
- 7.6.14 The trading assessment provided predominantly considers the convenience turnover of the stores/centre. However, it is important to recall that the total retail turnover of a centre/destination consists of a combination of both convenience (food) and comparison (non-food) turnover and, indeed, it should be recognised centres are more than their retail components. Impact must be weighed in the context of the whole of the centre.
- 7.6.15 Assessed levels of trade diversion to the new development is based on careful scrutiny of the function and retail offer of various stores; the relative accessibility of the various facilities by car and public transport; and the known characteristics of existing trading (as outlined in Table 4 and 5 and Appendix D). It is important existing trading patterns are taken into account, especially given the proposed development is for a redeveloped store (the existing store already forms part of the local retail environment).
- 7.6.16 Impact is assessed on a 'like for like' basis in respect of the convenience sector. It is widely accepted that retail uses tend compete with their most comparable competitive facilities. For example, in an area already served by modern convenience stores, the effects of new bespoke stores are likely to fall disproportionately on the existing competing modern stores. Their proportionate impact on smaller and local independent retailers, for example, may be less. Likewise, a proposal for a 'main food shop' supermarket is also less likely to compete with smaller 'top-up' convenience stores and corner shops.
- 7.6.17 These accepted patterns suggest that the proposed development will continue to compete predominantly on a 'like for like' basis with existing large/medium sized foodstores, as is the case now; by their nature these are more commonly accommodated in out of centre locations.



Trading Effects

7.6.18 Two measures of retail impact are set out in Appendix D:

- The change in turnover of centres in the period 2025-2030 following the development of the proposal; and
- The impact of the proposal on the calculated 2030 turnover of centres/stores.

7.6.19 The key changes following the development of the proposal between 2025-30 is that there will be a diversion of trade and consequential decreases in turnover achieved at surrounding stores within the period to 2030. However, the analysis highlights that in addition to Lidl, the surrounding area is predominantly served for main food shopping by large out of centre foodstores.

7.6.20 Table 8 at Appendix D demonstrate the effects of the proposed foodstore is anticipated to be predominantly felt by these foodstores, which typically lie out of centre, are not protected in retail terms, and in any event are well equipped to absorb the trading effect.

7.7 Summary

7.7.1 In summary, the proposed development constitutes the redevelopment of an existing, long standing and well-established local retail store, to deliver an enhanced facility for local shoppers.

7.7.2 The enhanced store proposes an additional c.353sqm net floorspace, well below the PPW floorspace threshold, but which provides the focus of a proportionate impact assessment.

7.7.3 The assessed impact of the proposed development is within acceptable levels. The effected stores are not protected in retail planning terms and well equipped to absorb the trading effects. It has been demonstrated the proposed development does not result in any significant adverse impact on in-centre turnover and trade. On the contrary the proposed development is anticipated to lead to positive trading effects by delivering an improved store to Risca Centre at a highly accessible location.

7.7.4 The proposed development will not result in a significant adverse impact on existing, committed or planned in-centre investment.

7.7.5 There is no evidence to indicate the proposal would either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover and vitality and viability of Risca centre.



8.0 Non-retail Principal Planning Considerations

8.1 Introduction

8.1.1 The above sections of this report address matters related to retail policy, including the sequential test and impact on vitality and viability, concluding that the revised scheme complies with national and local policy in this regard.

8.1.2 This section addresses other non-retail principal planning policy matters relating to the proposed development, namely:

- Principle of Development
- Design, Appearance & Soft Landscaping
- Flood Risk and Drainage
- Biodiversity
- Transport
- Noise
- Air Quality
- Economic Benefit
- Sustainability

8.2 Principle of Development

8.2.1 The entire site, which comprises brownfield land, lies within the defined settlement boundary for Risca, a Principal Town in the settlement hierarchy. The site is allocated for residential-led mixed-use development within the adopted Caerphilly LDP and has been identified as a key opportunity redevelopment site for mixed-use within more recent Supplementary Planning Guidance (SPGs) (Town Centre Action Plan and Lower Ebbw and Sirhowy Valleys Masterplan). The SPGs are material considerations in the determination of planning applications. Furthermore, as explained above, planning permission has been previously granted for the development of the site for a care home, retail A1 & A3 and office use. The site history and policy review in the preceding sections demonstrates a legacy of failed delivery of various redevelopment proposals at this site over a longstanding period. The history does however firmly establish the acceptability of the principle of redeveloping this site for commercial use.

8.2.2 The proposed development comprises a relocation of Lidl's existing store, which is required because an extension to their existing store is not feasible or viable (for the reasons detailed within Section 5). As a consequence, the store needs to relocate and the application site is considered to be the most suitable location as it is only a short distance away along Commercial Street and is already very well connected to the town centre, being located immediately adjacent



to the defined town centre boundary. The site is sequentially preferable as outlined in the preceding section.

- 8.2.3 Notwithstanding that the additional net floorspace created by the relocation falls well below the local policy threshold for requiring a retail impact assessment, the application is supported by a need, sequential test and impact (including health check) assessment provided within this report. As set out in the preceding sections a quantitative and qualitative need for the development is demonstrated.
- 8.2.4 In respect of adverse trading effects, the impact assessment finds this will be predominantly felt by existing out of centre convenience retail stores which are not protected in retail terms and well equipped to absorb the effects. There is no evidence to indicate the proposal would give rise to a significantly adverse impact on the trade, turnover, vitality and viability of Risca town centre.
- 8.2.5 The relocation of the existing Lidl store proposed development will be built in accordance with Lidl's contemporary specification, creating a bright, spacious sales area. Obtaining planning consent will ensure that Lidl continues to be able to suitably serve local needs from what is a well-established existing retail destination. The enhanced store will help improve store operations. Overall, the development will enhance local choice and competition to the direct benefit of local consumers. An improved customer experience will be achieved.
- 8.2.6 In addition, the existing Lidl site is intended to be redeveloped for mixed-use residential led development which will contribute to meeting much needed housing requirements including affordable housing needs within Risca. These proposals are subject to a separate planning application (submitted in due course). Together, the proposals meet the overarching local policy objectives for Risca centre.
- 8.2.7 Overall, the proposals will bring an otherwise vacant and underused parcel of previously developed land back into use, through an appropriately scaled and sited development, with no wider impact on local landscape and/or heritage assets. In conclusion, the principle for redeveloping the site for retail use is firmly established.

8.3 Design, Appearance and Soft Landscaping

- 8.3.1 The application is supported by a Design & Access Statement (HTC Architects) and Landscape Scheme (Corcadden Associates).
- 8.3.2 Lidl acknowledges the importance placed on good design in planning policy at all levels, with this in mind the proposed store has been designed to respond appropriately to the size of the site and its surrounding context.
- 8.3.3 The proposed development will be built in accordance with Lidl's contemporary specification, creating a bright, spacious sales area with full height glazing to the front elevation facing onto B4591 adding natural light to the shopping environment and modernizing the visual appearance.



- 8.3.4 The proposed elevations have been designed to provide activity and identity to the public frontages that respond to the geometry and site topography, whilst maintaining adequate clearances and separation and remain in keeping with the surrounding built environment. The elevations comprise white and grey clad panels. A limited but coherent palette of materials is proposed to create visual consistency. Each elevation treatment responds to its specific context by utilising carefully selected robust and high-quality components. For reference, a full palette of materials is set out in the accompanying Design and Access Statement.
- 8.3.5 Perimeter landscaping and proposed new landscaped areas will frame the proposed foodstore, adding visual interest and softening the schemes appearance. For detailed landscaping proposals please refer to the Landscape Proposals. The site will have a Five-Year Landscape Management Plan which will include annual inspections and reports to assess the establishment of the landscape and undertake defects replacements in this period and copied to the ecologist. The ecologist will undertake monitoring inspections in years 2 and 4 and additional visits if annual reports raise issues. Revisions to the management plan will be made as necessary to assist successful establishment.
- 8.3.6 In summary, the proposed development will provide a contemporary shopping environment that compliments and enhances the site's immediate surroundings. It is considered the proposed development fully complies with local plan policies.

Boundary Treatment and Landscaping

- 8.3.7 Careful consideration has been given to the boundary treatment and landscaping taking account of the surroundings.
- 8.3.8 The River Ebbw and the northern sloped river bank are to be retained intact with only minimal actions occurring at the top edge and slit planting at parts of the top edge. The existing development platform has overall limited boundary vegetation with just a storage area with no significant ground cover vegetation in the internal area. Birch trees and the majority of the Leyland Cypress are retained and 3No Sycamore trees and scrub are removed. The general development platform has low ecological value and limited biodiversity.
- 8.3.9 Tree and hedgerow losses to facilitate the development are to be compensated by new plantings with 25No trees mainly native hedges 110 linear metres, native blocks 918 square metres, planting beds 379sqm and wildflower grass areas 585sqm. The proposed site will provide an improvement in connectivity by planting on all boundaries, which link to off-site vegetation on the west boundary, north-east boundary and along the River Ebbw vegetated river.

8.4 Flood Risk and Drainage

- 8.4.1 The applicant has commissioned a technical report by Waterco to assess the flood risk and drainage of the proposed development. The findings allow the risks associated with the site to



be fully understood. They also inform a judgement on whether or not the flood risk is capable of being acceptably managed over the lifetime of the development.

- 8.4.2 The FCA confirms that the main potential source of flooding at this site is fluvial flooding from the Ebbw River. Under normal conditions (no structure blockage), the site is flood free during all events up to and including the 1% AEP event. The majority of the site, including the location of all development is flood free during the 1% AEP plus 25% CC event.
- 8.4.3 During the 1% AEP plus 70% CC event, the site is estimated to flood. The maximum flood level in the location of the proposed Lidl Store is 44.72m AOD. During the 0.1% AEP event, the maximum flood level in the location of the proposed Lidl Store is 44.56m AOD. Flood levels and depths increase on site during a blockage of the adjacent B4591 road bridge.
- 8.4.4 It is proposed to set the finished floor level of the Lidl store at 44.409m AOD. For access reasons, it is not practical to raise the finished floor level further. Flood depths internal to the store are less than 600mm during the 1% AEP plus 70% CC and 0.1% AEP events. Flood resilience measures will be applied where practical to minimise the consequences of flooding during extreme flood events.
- 8.4.5 The site is currently used as a yard to store building materials, shipping containers and similar items. The current site owner could theoretically store a substantial quantity of stock and materials on site which would remove flood water storage.
- 8.4.6 The FCA report concludes that when compared against the theoretical existing use (the whole site could be used for storage, thereby removing substantial flood storage), the proposed Lidl Store would provide betterment in terms of flood risk through provision of landscaped areas, access roads and the car park which would allow for floodwater storage.
- 8.4.7 To ensure the proposed development will not increase flood risk elsewhere, surface water discharge from the site will be controlled and attenuation storage will be provided to accommodate storm events up to and including the 1 in 100 year plus 40% CC event. All methods of surface water discharge have been assessed. Discharge of surface water to the Ebbw River at a limited 1 in 1 year greenfield runoff rate of 6.3 l/s appears to be the most practical option.
- 8.4.8 Attenuation storage will be required on site in order to restrict surface water discharge to 6.3 l/s. Attenuation can be provided in the form of a below ground attenuation tank located beneath the car park in the eastern extent of the site. In addition to the attenuation tank, raingardens and permeable paved parking bays will be utilised to provide amenity and biodiversity benefits.
- 8.4.9 The FCA and Drainage report states that the proposed development will discharge foul flows to the public combined sewer in Llanarth Square to the north of the site. A Concept Designer's Risk Assessment (cDRA) has been prepared to inform future designers of any identified hazards



associated with the scheme. The cDRA has been included in Appendix M of the FCA and Drainage Report.

8.5 Biodiversity

8.5.1 The application is supported by a Preliminary Ecological Appraisal (PEA) prepared by Biodiverse Consulting. The PEA presents the key ecological constraints and opportunities in relation to the development.

8.5.2 The site was subjected to PEA walkover survey during which habitats were assessed in line with the UK Habitat Classification (UKHab) methods. There were no access restrictions, and the survey was conducted within the optimal botanical survey period.

8.5.3 The report concluded the following:

- One statutory designated site and seven non-statutory designated sites were identified within 1km of the Site. The River Ebbw SINC is located adjacent to the site.
- The Modified Grassland, Mixed Scrub and Other Standing Water which are present are considered to be of low value. Developed Land; Sealed Surface is also present which is considered to be of negligible value.
- The majority of the site consists of urban habitats of negligible value. Scrub habitat present is of Low value.
- The habitats on site and immediately adjacent to the Site are considered to be of negligible suitability to foraging and commuting bats. No further surveys are required to assess value of the site for bats.
- Scrub and trees afford limited suitability for nesting and foraging. The adjacent River Ebbw provides good quality foraging habitat to a range of species. The site is considered to be of local value for birds.
- The terrestrial habitats within the site offer poor suitability for otter. No activity or signs confirming otter presence were recorded.
- The terrestrial habitats within the Site offer poor suitability for otter. No activity or signs confirming otter presence were recorded.
- The Site has the potential to support hedgehog with habitats providing some limited suitability for foraging and resting.
- Measures to mitigate for impacts have been set out along with recommendations for enhancement of the site's ecological value. The recommendations made include:
 - Production of Construction Ecological Management Plan
 - Production of a wildlife sensitive lighting scheme



8.5.4 Implementation of the recommendations will ensure that there are no significant impacts upon protected species and that the proposals are conformity with relevant legislation and policy.

8.5.5 A Green Infrastructure Strategy is prepared by Corscadden Associates, this confirms the step-wise approach has been undertaken. The GIS concludes overall the proposals, considering the location of the site in this retail area of Pontymister and the site's current low ecological value with limited diversity, will provide a biodiversity net gain.

8.6 Transport

8.6.1 The application is supported by a Transport Assessment prepared by Corun. The assessments detail the merits of the proposals in transport terms and examine the highway and transportation issues associated with accommodating the proposed development.

8.6.2 The TA concludes that:

- **Sustainable and Accessible** - The site is located in the south of Risca, and is accessible by both foot and cycle to a large residential population living within the entirety of the wider Risca settlement area, offering potential employees or customers / visitors living within in the area, opportunities to travel to the site by these modes. The additional excellent accessibility to regular bus and rail services will also allow opportunities for sustainable travel for longer distance trips to the site (especially for staff commuting trips).
- **Trip Generation** - The store will draw a majority of its custom from residents within the Risca area who are currently undertaking retail trips to other existing stores within the local or wider area. The store is therefore anticipated to generate a minimal volume of additional new primary trips on the highway network.
- **Site Access Arrangements** - The existing access junction along Commercial Street in the north west of the site will only accommodate servicing vehicle movements at the site. The site will generate a negligible volume of servicing vehicles across a daily period, and therefore no capacity assessment has been undertaken for this access junction. The modelling has identified that the proposed new access junction would be expected to operate well within theoretical capacity with the proposed development in operation.
- **Surrounding Junction Capacity**- The proposed development would not therefore be anticipated to cause any significant capacity impact on the surrounding highway network to the site.
- **Accident Data** - A review of the accident record does not identify any significant highway safety issue along the surrounding highway network to the site, and the increase in



traffic generated by the proposed development is unlikely to exacerbate the existing safety record to a significant enough level to warrant concern.

- 8.6.3 In summary, the Transport Statement demonstrates that the development should be considered acceptable in terms of highways and transportation and the proposed development is compliant with national and local plan policy.

8.7 Noise

- 8.7.1 Inacoustic were commissioned to assess the impact of potential noise arising from a proposed development to understand potential noise effects and how these may be mitigated. Noise measurements have been undertaken at the site and a subsequent 3-dimensional noise modelling exercise conducted.
- 8.7.2 Noise measurements were undertaken at locations representative of the closest noise-sensitive receptors in the vicinity of the site, for both daytime and night-time periods.
- 8.7.3 The Noise Assessment concludes that noise from plant installations, vehicle deliveries, and customer vehicles will have a "low impact" on the closest sensitive dwellings. The report concludes that noise can be controlled through appropriate engineering and design and should not hinder planning permission approval.

8.8 Air Quality

- 8.8.1 The application is supported by an Air quality Assessment prepared by SLR. The report concludes that provided that mitigation measures as recommend within the report are implemented the residual effects from dust emissions arising during the construction phase are considered to be 'not significant'.
- 8.8.2 In response of the operation phase, the report concludes that the road traffic volumes associated with the proposed development are largely considered to be already on the road network and it is therefore anticipated to generate a minimal volume of additional new primary trips and are likely to be 'insignificant'. Therefore compliant with relevant local plan policy.

8.9 Economic Benefit

- 8.9.1 The construction phase will bring employment opportunities. Workers employed in construction and related fields spend their earnings locally, benefiting local businesses and encouraging economic circulation. At the operational phase the proposed foodstore element will provide c. 40 direct, full time equivalent (FTE) jobs from e.g. store assistants and cleaners to managers etc. These job opportunities will be accessible on foot or bicycle to the surrounding resident population. Lidl currently pay a retail industry leading wage of £12.40/hour, increasing to £13.35 hour for long service.



8.9.2 Local shoppers are currently at an economic disadvantage insofar as they do not have easy access to the 'limited assortment discount' retail format and offer provided by Lidl. The development will assist with increasing the local availability of affordable food which is an important consideration in the context of the cost-of-living challenges faced by local consumers in the short and medium term.

8.10 Sustainability

8.10.1 Lidl stores are designed to be as environmentally sound as possible. For example, store heating systems are highly efficient condensing boilers which recover waste heat from the combustion process. All heating is regulated by sensors. The canopy of the store is also designed to minimise thermal gain within the building.

8.10.2 A system of 180 12 kWp Photo Voltaic panels consisting of 468 PV modules are proposed on the roof of the store to generate on site renewable energy for use in the store.

8.10.3 The lighting in the storage and warehouse areas is controlled by movement sensors so that lights only turn on when the space is in use. The sales area uses full lighting during trading hours but cuts back to one third lighting before and after trading hours to allow for re-stocking of the store. A Building Management System and LUX sensors control the lighting. This means that lights are only on when necessary, during dark periods and ensures that lights do not remain on later than 2 hours after the store closes.

8.10.4 Sustainable techniques are used during the construction and operation of the development wherever practicable.

8.11 Summary

8.11.1 It is considered that the application proposal complies fully with the relevant planning policy criteria and will deliver a store design that is appropriate to the surrounding area. It has been demonstrated that there are no adverse impacts that would significantly and demonstrably outweigh the benefits brought about as a result of this proposals.



9.0 Summary and Conclusions

- 9.1.1 This Planning and Retail Statement (PRS) has been prepared by CarneySweeney (CS) on behalf of the applicant, Lidl Great Britain Ltd, in support of a full planning application for the erection of a Class A1 retail foodstore with surface level car parking, landscaping, all associated development at land off Commercial Road, Risca.
- 9.1.2 This PRS should be read in conjunction with the Design and Access Statement and other documents and drawings submitted in support of this application.
- 9.1.3 This PRS has demonstrated that the proposal is in accordance with planning policy at all levels:
- A need for the proposed development has been demonstrated. The development will better cater for its well-established customer base and meet the identified need for improved local facilities.
 - The sequential test has identified that no sites can be considered available, suitable and viable sequentially preferable alternatives in respect of the proposals. The proposed development is considered, therefore, to fully accord with local and national policy and guidance as well judicial and appeal authority with respect to the sequential approach.
 - The proposed development constitutes the relocation of an existing, long standing and well-established local retail store, to deliver an enhanced facility for local shoppers. The enhanced store proposes just an additional c.353sqm net floorspace. Notwithstanding this, the provided impact assessment demonstrates no unacceptable impact on the vitality and viability of Risca centre.
- 9.1.4 The proposal is considered acceptable in all other technical aspects including highways; flood risk and drainage; ecological impact; design and green infrastructure.
- 9.1.5 The proposed development's accordance with planning policy at all levels provides an overall balance of consideration which weighs firmly in favour of permitting the current proposals.



Appendix A – Site Layout Plan

PAC DRAFT



THIS DRAWING IS COPYRIGHT, AND REMAINS THE PROPERTY OF HTC ARCHITECTS. IT MUST NOT BE REPRODUCED, USED, DISCLOSED OR TRANSMITTED TO THIRD PARTIES IN ANY FORM, IN WHOLE OR IN PART, WITHOUT PRIOR WRITTEN PERMISSION.

DO NOT SCALE!
ALL DIMENSIONS SHOULD BE CHECKED ON SITE BEFORE WORK COMMENCES

DESIGN SUBJECT TO FOLLOWING:
HIGHWAYS ENGINEERING DESIGN AND COMMENT
TREE & TPO SURVEY
M&E DESIGN
FLOOD RISK ASSESSMENT
GROUND INVESTIGATION
LANDSCAPE ARCHITECTS DESIGN
LEVELS REVIEW
DRAINAGE DESIGN
TITLE DEED REVIEW

LIDL DESIGN BASED OFF OF LATEST BBS 2023 LIDL SPECIFICATION - FEBRUARY 2024

HIGHWAYS DRAWINGS BASED ON CORUN DRAWING: 23-00849 PL01 Rev 8 Potential Island Junction

SITE AREA = 10,710 SQ M / 2.64 ACRES

EXISTING TELECOMS POLE WITH OVERHEAD UTILITIES - SHOWN IN TURQUOISE

EXISTING TREES TO REMAIN - RPA TO BE SURVEYED - ANY EXCAVATION TO BE DONE AS PER SPECIALIST INSTRUCTION

SCHEDULE OF AREAS (TYPE 1300)

SALES	=1334 m ²
WAREHOUSE	=410 m ²
ANCILLARY	=218 m ²
GIA	=1962 m ²

EXISTING RIGHT OF WAY TO SLIGHTLY MODIFIED TO BE BROUGHT AWAY FROM THE PROPOSED ROADWAY AND STRAIGHTEN UP TO CONNECT TO BRIDGE CROSSING

SITE ACCESS AND HIGHWAYS BASED ON CORUN HIGHWAYS DRAWING: 23-00849 PL01 Rev B

PROPOSED LANDSCAPING BASED ON LANDSCAPE ARCHITECTS DESIGN. REFER TO CA 2024-RISCA-03 LANDSCAPEPROPOSALSOVERALL FOR MORE INFORMATION

Scale bar added, north point adjusted, general W 23/01/2025 annotation moved. KA
 Proposed landscaping scheme updated as per V 13/11/2024 Consolidation drawing 123 CA 2024 - RISCA-0 REV 8 KA
 U 11/11/2024 Proposed rear retaining wall location adjusted. KA
 Scheme updated as per new topographical survey received 04/11/24 and updated as per T 04/11/2024 Consolidation Landscaping scheme. KA
 S 04/10/2024 Lidl flagpole added. KA
 Rev. Date Description Drawn

htcarchitects

York Place Studio
8 Britannia Street
Leeds
LS1 2DZ
T:(0113) 244 3457

W: www.htcarchitects.co.uk
E: info@htcarchitects.co.uk

client
Lidl GB Ltd.



project
**Commercial Street
Risca**

drawing title
Proposed Setting Out Plan

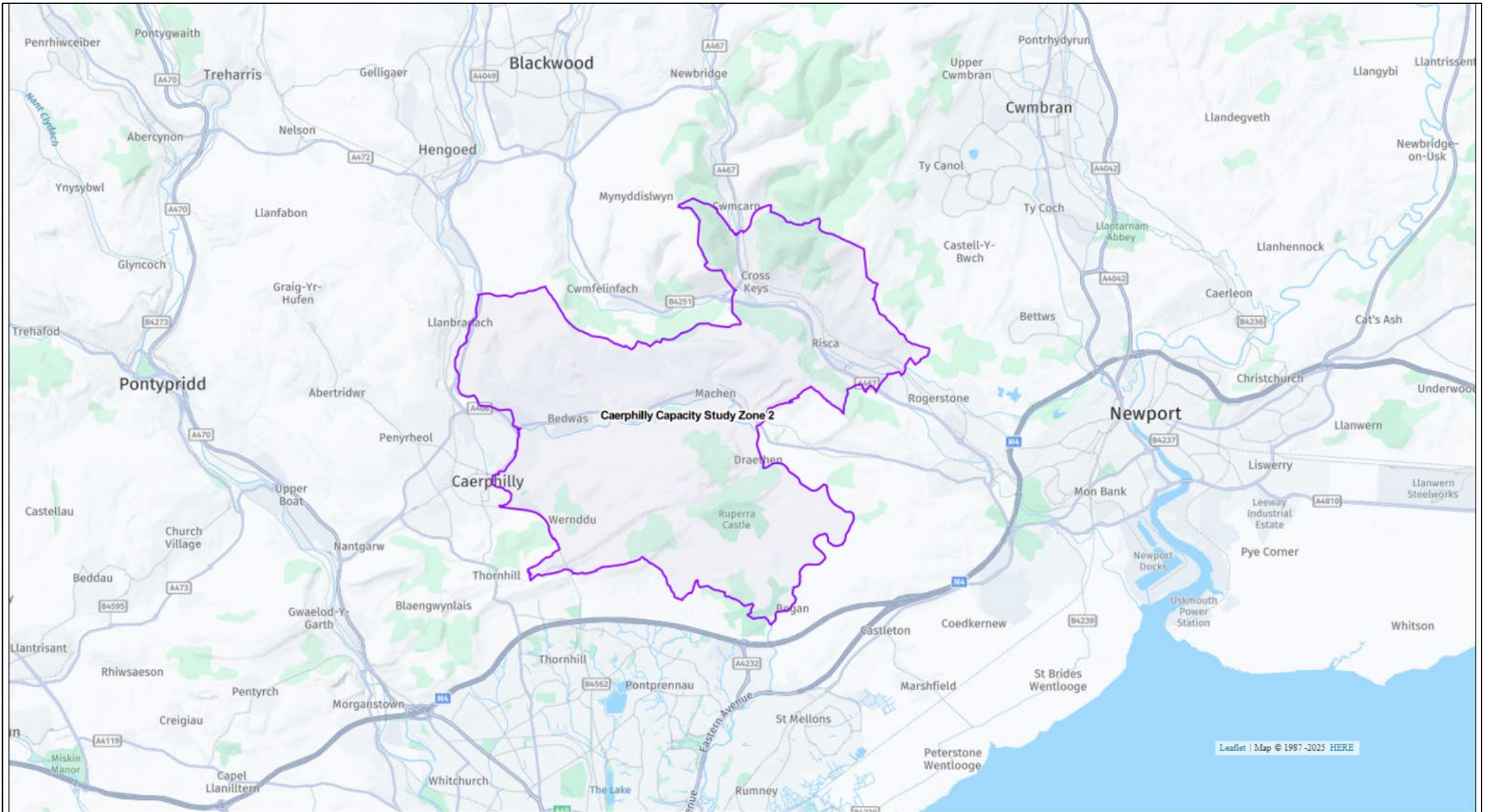
date **September 2024**
status **Planning**
scale **1:500 @ A3**
drawn **KA checked BM**
job no. **3067** dwg no. **P402** rev. **W**



Appendix B – Primary Catchment Area (PCA)

PAC DRAFT





Leaflet | Map © 1987-2025 HERE

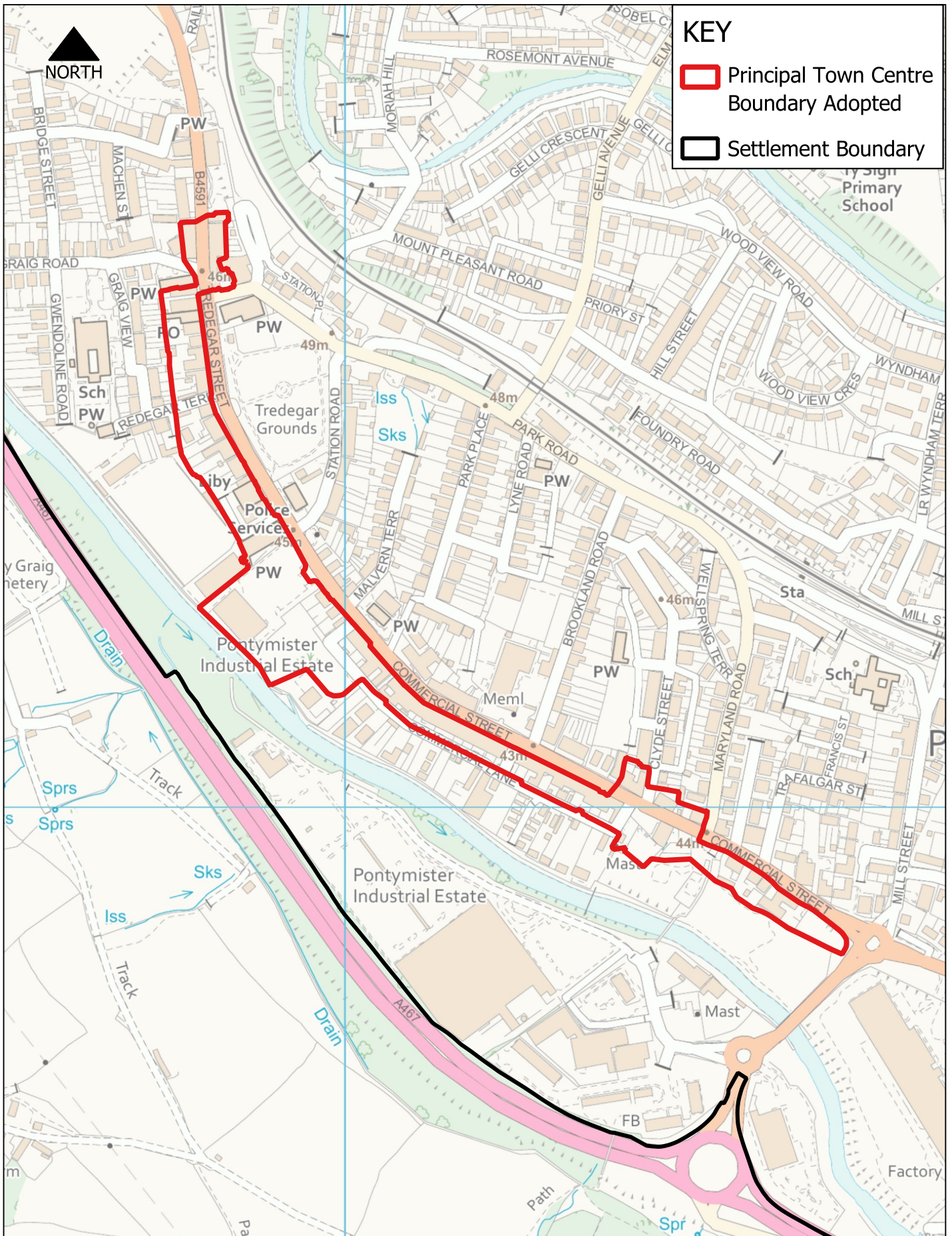
Legend

- ▭ Caerphilly Capacity Study Zone 2

Appendix C – Risca / Pontymister Plan

PAC DRAFT





Appendix D - Statistical tables

PAC DRAFT



Lidl Great Britain Ltd
Commercial Street, Risca

Table 1: Population

Zone	2025	2026	2027	2028	2029	2030	Change 2025-2030	
							No.	%
	[1]					[2]	[3]	[4]
Zone 1 Caerphilly	54,055	54,402	54,749	55,097	55,444	55,791	1,736	3.2
Zone 2 Risca/Pontyminster - PCA	32,203	32,213	32,223	32,234	32,387	32,254	51	0.2
Zone 3 Nelson	23,268	23,421	23,574	23,728	23,738	24,034	766	3.3
Zone 4 Ystrad Mynach	32,580	32,682	32,783	32,885	32,986	33,088	508	1.6
Zone 5 Blackwood	50,574	50,685	50,796	50,906	51,017	51,128	554	1.1
Zone 6 Rhymney	22,938	22,946	22,953	22,961	22,968	22,976	38	0.2
Total	215,618					219,271	3,653	1.7

Notes:

Population projections extrapolated from CCBC Retail Capacity Study - Population and Housing Preferred Growth option (Table 1B)

[3] = [2] - [1]

[4] = [3] / [1]%

Lidl Great Britain Ltd
Commercial Street, Risca

Table 2: Convenience goods expenditure (per capita)(£) (exc SFT)

Zone	2025	2026	2027	2028	2029	2030
Zone 1 Caerphilly	2,243	2,234	2,229	2,227	2,225	2,223
Zone 2 Risca/Pontyminster - PCA	2,298	2,289	2,284	2,282	2,280	2,277
Zone 3 Nelson	2,241	2,232	2,227	2,225	2,223	2,221
Zone 4 Ystrad Mynach	2,210	2,201	2,197	2,195	2,192	2,190
Zone 5 Blackwood	2,212	2,203	2,199	2,196	2,194	2,192
Zone 6 Rhymney	2,112	2,103	2,099	2,097	2,095	2,093

Notes:

per capita figures sourced from from Experian Location Analyst report data

Excludes SFT in line with Fig 5 of EXRPBN 21 (Feb 2024)

subsequent years projected forward in accordance with growth rates set out in App 3 of EXRPBN 21 (adj. for SFT (sales via stores

2022 prices

Table 3a: Total Convenience Goods Expenditure, 2025-30 (£m)

Zone	2025	2026	2027	2028	2029	2030	Change 2025-30	
	[1]					[2]	£m	%
Zone 1 Caerphilly	121.2	121.5	122.0	122.7	123.4	124.0	2.8	2.3
Zone 2 Risca/Pontyminster - PCA	74.0	73.7	73.6	73.6	73.8	73.5	-0.5	-0.7
Zone 3 Nelson	52.1	52.3	52.5	52.8	52.8	53.4	1.2	2.4
Zone 4 Ystrad Mynach	72.0	71.9	72.0	72.2	72.3	72.5	0.5	0.6
Zone 5 Blackwood	111.9	111.7	111.7	111.8	111.9	112.1	0.2	0.2
Zone 6 Rhymney	48.4	48.3	48.2	48.2	48.1	48.1	-0.4	-0.7
Total	479.7	479.4	480.0	481.2	482.3	483.5	3.8	0.8

Notes:

[1] & [2] Derived by multiplying the population (Table 1) with expenditure per capita per zone (Table 2).

[3] = [2] - [1]

[4] = [3]%

Table 3b Total main food shopping expenditure (£m)

Zone	2025	2026	2027	2028	2029	2030
Zone 1 Caerphilly	96.98	97.21	97.64	98.16	98.68	99.20
Zone 2 Risca/Pontyminster - PCA	59.20	58.99	58.89	58.85	59.07	58.77
Zone 3 Nelson	41.71	41.82	42.01	42.24	42.21	42.70
Zone 4 Ystrad Mynach	57.60	57.55	57.61	57.73	57.85	57.97
Zone 5 Blackwood	89.49	89.32	89.34	89.45	89.55	89.66
Zone 6 Rhymney	38.75	38.61	38.55	38.52	38.49	38.47
Total	383.7	383.5	384.0	384.9	385.9	386.8

Notes:

Proportion of expenditure on main food shopping derived from the mean weekly expenditure for each zone

Table 3c Total top up food shopping expenditure (£m)

Zone	2025	2026	2027	2028	2029	2030
Zone 1 Caerphilly	24.2	24.3	24.4	24.5	24.7	24.8
Zone 2 Risca/Pontyminster - PCA	14.8	14.7	14.7	14.7	14.8	14.7
Zone 3 Nelson	10.4	10.5	10.5	10.6	10.6	10.7
Zone 4 Ystrad Mynach	14.4	14.4	14.4	14.4	14.5	14.5
Zone 5 Blackwood	22.4	22.3	22.3	22.4	22.4	22.4
Zone 6 Rhymney	9.7	9.7	9.6	9.6	9.6	9.6
Total	95.9	95.9	96.0	96.2	96.5	96.7

Notes:

Proportion of expenditure on top up food shopping derived from the mean weekly expenditure for each zone

Lidl Great Britain Ltd
Commercial Street, Risca

Table 6: Retail Turnover Uplift of Proposed Development

	Gross internal area (sqm)	Total Net Sales (sqm)	Net sales area (sqm)	Trading density (£/sqm)	Turnover 2025 (£m)	Turnover 2030 (£m)
	[1]	[2]	[3]	[4]	[5]	[6]
<i>Existing Lidl Foodstore convenience comparison</i>	1,507	987	785 196	9,197 4,865	7.2 1.0	7.3 1.1
Proposed Lidl Foodstore convenience comparison	1,962	1,334	1,138 196	9,197 4,865	10.5 1.0	10.6 1.1
Total convenience turnover uplift						3.3

Notes

[1] [2] Areas taken from application drawings

[3] assumed 85% net conv sales area of new store

[4] s/d taken from Global Data 23, 2022 price base

[5] = [3]x[4]/1,000,000

[6] benchmark turnover rolled forward to 2030 based on assumed f/s efficiency increase (0.2% conv and 2.6% comp p/a) (EXRPBN 21 Figs 4a&b (Feb 2024))
exc. Inflow

2022 prices

Table 7: Capacity for additional convenience floorspace to 2030

	2025	2030
[1] Available Convenience Expenditure in PCA (Zone 2) (£m)	74.0	73.5
[2] PCA derived turnover of existing stores in PCA (Zone 2) (£m)	39.5	39.2
[3] Turnover uplift of proposed development (£m)	0.0	3.3
[4] Turnover of Convenience Retail Commitments in PCA (£m)	0.0	0.0
[5] Total PCA turnover (£m)	39.5	42.5
[6a] PCA convenience expenditure capacity (£m)	34.5	30.9
[6b] Retained market share of PCA expenditure (%)	53.4	57.9

Notes

[1] taken from table 3a

[2] derived from table 5. Projected forward to from pro-rata growth in expenditure as set out at Table 4.

[3] taken from table 6

[4] no PCA based commitments

[5] = [2]+[3]+[4]

[6a] = [1]-[5]

[6b] = [5] as a % of [1]

exc. Inflow

2022 prices

Table 8: Convenience trading effects of the proposed development, 2025-30

SOLLUS

	Convenience Turnover 2025	Convenience Turnover 2030	Trade Diversion to Proposed Development		Residual Conv Turnover 2030	Change 2025-30		2030 Impact	
	£m	£m	%	£m	£m	£m	%	£m	%
	[1]	[2]	[3]		[4]	[5]	[6]	[7]	[8]
Primary Catchment Area									
Risca/Pontymister town centre	2.4	2.4	2	0.07	2.3	-0.1	-2.4	-0.1	-2.7
Risca/Pontyminster Out of centre									
Aldi, Interchange, Risca, NP11 6NP	10.6	10.6	35	1.1	9.5	-1.1	-10.8	-1.1	-10.8
Tesco Extra, Pontymister Industrial Estate, Pontymister, NP11 6NP	21.2	21.2	55	1.8	19.4	-1.8	-8.5	-1.8	-8.5
Caerphilly									
Asda, Pontygwindy Road, Caerphilly, CF83 8SX	42.5	42.5	8	0.3	42.3	-0.3	-0.6	-0.3	-0.6
Total			100	3.3					

Notes

[1] taken from table 5

[2] allowance made for pro rata gain in turnover in line with exp growth in Table 4a

[3] CS assessment, allowing for f/s efficiency growth (Table 6)

[4]=[2]-[3]

[5] = [4] - [1]

[6] = [4]-[1]/[1]x100

[7] = [4]-[2]

[8] = [4]-[2]/[2]x100

exc. Inflow

2022 prices