

Lidl Great Britain Ltd

## **Planning & Retail Statement**

Land off Penmaen Road, Pontllanfraith,  
Blackwood

by CarneySweeney

March 2025



**CARNEYSWEENEY**  
PLANNING

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## 1.0 INTRODUCTION

### 1.1 Background

1.1.1 This Planning and Retail Statement (PRS) has been prepared by CarneySweeney on behalf of the applicant, Lidl Great Britain Ltd, ('Lidl') in support of a full planning application for a new Lidl foodstore on land off Penmaen Road, Pontllanfraith, Blackwood (herein referred to as the Application Site).

1.1.2 This report focuses on the general planning and retail policy issues associated with the application proposals. It is intended to assist Caerphilly County Council in its determination of the application and has been prepared in accordance with the requirements set out in Future Wales: The National Plan 2024 and Planning Policy Wales.

1.1.3 This report is not a standalone document and should be read in conjunction with all other elements of the application which include:

- Design and Access Statement;
- Ecological Impact Assessment;
- Green Infrastructure Statement;
- Arboricultural Report and associated plans;
- Transport Assessment and Travel Plan;
- Noise Impact Assessment;
- Coal Mining Risk Assessment;
- Ground Investigation Reports (Phase 1, Phase 2 and rotary borehole results);
- Market Appraisal letter; and
- Pre-Application Consultation Report

### 1.2 Structure of the Report

1.2.1 The remainder of the report is structured as follows:

- Section 2 provides a detailed description of the site and the surroundings;
- Section 3 describes the application proposals including Lidl's Business Model;
- Section 4 provides a summary of the relevant development plan policies;
- Section 5 sets out an assessment of existing retail provision;
- Section 6 considers the need for the proposed development;
- Section 7 considers the application of the sequential test;
- Section 8 provides an assessment of retail impact;
- Section 9 outlines non-retail planning considerations;
- Section 10 presents our overall conclusions.



## 2.0 THE SITE AND CONTEXT

### 2.1 The Application Site

2.1.1 The Application Site is located to the west of Penmaen Road and south of the B4254. The site is a broadly rectangular parcel of land which measures approximately 0.86 hectares (8,657 sqm) and is currently occupied by a detached workshop building providing single storey office / ancillary accommodation, measuring circa 3,115 sq m, within a self-contained, fenced site that is mainly laid to tarmac. The surrounding area comprises a mix of residential and industrial uses. See **Figure 1** below.



Figure 1: Site Location Plan (outlined in red)

2.1.2 The site currently has two vehicle access points, one from the B4254 in the north, and a second access via the Penmaen Industrial Estate access road in the south.



- 2.1.3 Nearby supermarkets comprise the Aldi store at Blackwood Gate Retail Park (400m to the northwest), the Sainsburys supermarket at Pontllanfraith (900m to the southeast) and the Asda at Blackwood town centre (1.2km to the northwest).
- 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. There are no nature/ecological designations affecting the site. The site lies within Flood Zone A and is at little to no risk of flooding.
- 2.1.5 The eastern boundary of the site is currently lined with conifer trees which have been topped by pruning and left unmanaged.
- 2.1.6 The site's surroundings are predominantly residential and commercial in character. Residential dwellings adjoin the site's southeastern corner at Penmaen Road and opposite the site's norther boundary (Maes Yr Afon). The Penmaen Industrial Estate lies immediately adjacent to the south and west.

## **2.2 Site/Planning History**

- 2.2.1 The site is currently occupied by Stagecoach as a bus maintenance depot. Historically the site employed as many as 106 people, however, it now employs just five as a skeleton staff as existing operations have already been relocated to other Stagecoach sites in Cwmbran and Caerphilly. Only a small amount of specialist vehicle maintenance is carried out at the site now, hence the low number of employees. Stagecoach have confirmed that the cause for the downsizing is entirely as a result of the change in market conditions following the Covid pandemic, removing the requirement for a site of this size, with its associated costs, and consequential consolidation of operations to other sites within the locality.
- 2.2.2 The further winding down of the site will occur in 2025 as the majority of the five remaining employees are relocated within the business, most likely to Stagecoach depots in Porth or Cwmbran.
- 2.2.3 An online search of the Council's planning page has only revealed applications associated with the use as a bus maintenance depot (installation of refuelling and repair bays, MOT bays, bus washing facilities and canopies etc.)



## 3.0 THE PROPOSED DEVELOPMENT

### 3.1 The Application Proposals

3.1.1 Owing to Lidl's well established and growing local customer base, Lidl has a requirement for a new store in Blackwood to cater to local customer demand. The proposed development seeks planning permission for the following:

*“Demolition of bus depot building, regrading of site and erection of a Class A1 retail foodstore with surface level car parking, landscaping, and all associated drainage and engineering operations and service connections”.*

3.1.2 The proposals are shown on the Proposed Site Layout Plan (Drawing No. 2973 P404H Proposed GA Site Plan) and comprise: -

- The demolition of the existing bus depot maintenance building;
- Regrading of the site;
- Erection of a new single storey Lidl food store of 2,045 sqm gross external area with a net sales area of 1,334 sqm together with a warehouse area and ancillary/welfare areas;
- 114 customer car parking spaces including 6 accessible bays, 9 parent and child bays, and 2 bays with rapid electric vehicle (EV) charge points;
- Vehicular access taken from the B4254; and
- Hard and soft landscaping.

#### **Siting and Appearance**

3.1.3 The proposed food store will be located in the western part of the site. It will be single storey with a mono-pitch roof rising on its eastern elevation. The customer entrance will be located at the north-east corner of the building. The majority of the northern elevation facing onto the B4254 is proposed to be glazed. A canopy is proposed above the glazing and provides shelter to those entering and leaving the store, as well as cover to the trolley storage area and cycle parking which is located adjacent to the store entrance. The canopy is also designed to manage thermal gain within the building. Photo Voltaic (PV) panels are proposed on the roof of the store to generate on-site renewable energy for use in the store.

3.1.4 New perimeter landscaping is proposed to frame the development within its wider setting and replace the existing poor quality conifer line.

#### **Access**

3.1.5 The re-development of the site would see these existing vehicle access arrangements removed, with vehicle access to the proposed new foodstore unit being provided from a newly developed access junction along the B4254 in the north of the site.





- 3.1.6 The new access junction will comprise a priority arrangement with a dedicated lane for right turners into the site. To ensure delivery vehicles can safely enter and exit the site at the proposed new access junction, a slight widening of the B4254 carriageway is required in the immediate vicinity of the site along with the slight repositioning of the existing pedestrian island. A new, additional pedestrian island is proposed to the west of the access to facilitate those walking to/from the west.
- 3.1.7 The new site access junction will include direct pedestrian links into the existing footway running along the southern edge of the B4254. A further pedestrian connection will also be provided in the east of the site, connecting directly into the existing footway running along the western edge of Penmaen Road.
- 3.1.8 Internal pedestrian routes will be provided connecting between the proposed store entrance, and each proposed pedestrian access point. These routes will follow a direct pedestrian line and will include marked pedestrian crossing facilities where required.

### **Deliveries and Servicing**

- 3.1.9 The store will be serviced via a loading bay on its southern side so that all deliveries of goods to the store, and the collection of waste from it, will be carried out within the building. There will be no movement or storage of waste in any outside area. The number of deliveries may be higher at peak seasonal times but will remain, typically, no more than 1 to 2 per day. These delivery vehicles also take waste back to the regional distribution centre which serves the store, helping to reduce the number of traffic movements at Lidl's sites and reducing emissions as a consequence.

## **3.2 Lidl's Operational Model**

- 3.2.1 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.
- 3.2.2 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 500m<sup>2</sup> to 1,400m<sup>2</sup> (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”.*



- 3.2.3 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 3,000. 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.
- 3.2.4 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. A Lidl store typically stocks around 3,000 items, although the company's planning consents generally allow the flexibility for up to 4,000 items so as to accommodate future growth. In comparison the major operators, such as Morrison, Tesco, Asda and Sainsbury, can retail over 35,000 items. In addition to the limited product range, unlike its counterparts in the retail industry, Lidl seldom stock multiple lines of the same product. For these reasons, Lidl stores successfully trade immediately adjacent to larger superstores and smaller convenience stores in numerous locations across the UK. Indeed, Lidl have always operated as a complementary retailer, with a significant proportion of customers also choosing to visit other retailers to fulfil their needs. 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.
- 3.2.5 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.
- 3.2.6 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.
- 3.2.7 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.

- 3.2.8 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.
- 3.2.9 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.
- 3.2.10 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.
- 3.2.11 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.
- 3.2.12 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.
- 3.2.13 Meanwhile, 100% 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.
- 3.2.14 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.
- 3.2.15 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.



3.2.16 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.

### **3.3 Pre-application Consultation**

3.3.1 The application submission follows discussions with Caerphilly County Borough Council Officers, initiated in January 2025 whereby the draft proposals were submitted to the LPA for comment.

3.3.2 Pre-application consultation responses were received from the LPA on 14 February 2025 which provided advice on the following points:

- Given the presence of existing built development and the surrounding topography, the proposed scheme will have no impact on the setting of designated historic assets.
- The principle of development is against LDP policy CW13 (criterion C (iv)). If the applicants wish to argue that part of the employment site is no longer suitable for its intended purpose (or for any other purpose allowed by the LDP), they should do so through the 2RLDP process, not through a planning application.



## 4.0 PLANNING POLICY CONTEXT

### 4.1 The Development Plan

4.1.1 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.

4.1.2 The development plan for this site comprises:

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

#### ***Future Wales: The National Plan 2040 (February 2021)***

4.1.3 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 but highlights three National Growth Areas, one of which is 'Cardiff, Newport and the Valleys'.

4.1.4 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.

4.1.5 Reference is made to the 'Economic Action Plan' and notes that this plan supports the delivery of Prosperity for All – the national strategy for Wales. It further notes that the "foundation sectors include tourism, food, retail and care". Finally, it is noted that "Future Wales supports and helps deliver the aims of the Economic Action Plan. Future Wales:... supports the foundational economy".

#### ***Caerphilly CBC Local Development Plan***

4.1.6 The Caerphilly LDP was adopted in November 2010 and covers the period to 2021. It forms part of the statutory development plan alongside Future Wales: The National Plan 2040.

4.1.7 The LDP identifies the site as a protected employment site within the settlement boundary. No other allocations/designations relate to the site.



- 4.1.8 Blackwood is noted as a Principal Town within the Northern Connections Corridor (NCC). The LDP notes that “the Northern Connections Corridor (NCC) has experienced significant levels of house building over the last ten years.” The proposed retail store will assist in meeting the demand for retail which inevitably arises as a result of this increase in housing.
- 4.1.9 The policies of relevance to the proposed development are set out below.
- 4.1.10 **Policy SP2 Development Strategy** – Development in the Northern Connections Corridor advises that development proposals in the NCC will promote sustainable development that:
- A. Focuses significant development on both brownfield and greenfield sites that have regard for the social and economic functions of the area
  - B. Reduces car borne trips by promoting more sustainable modes of travel
  - C. Makes the most efficient use of the existing infrastructure
  - D. Protects the natural heritage from inappropriate forms of development
  - E. Capitalises on the economic opportunities offered by Oakdale / Penyfan Plateau
- 4.1.11 **Policy SP4 Settlement Strategy** sets out the settlement hierarchy with Blackwood and Ystrad Mynach noted as Principal Towns in the NCC and Nelson and Newbridge noted as District Centres in the NCC. The Plan seeks to enhance these areas based on their current role and function in order to respond appropriately to the economic, social and environmental needs of individual settlements. (NB While Blackwood Gate Retail Park has a defined boundary in the LDP, this was “to promote its development in advance of sites in other less appropriate out-of-centre locations” and thus it does not confer the status of a designated town or district centre on the site).
- 4.1.12 **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.
- 4.1.13 **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.
- 4.1.14 **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.

- 4.1.15 **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, and
  - 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 1000m<sup>2</sup> 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.
- 4.1.16 **Policy EM2** identifies sites protected for employment uses, in line with their status in the employment hierarchy, including the application site and surrounding land as EM2.23 “Penmaen”, which is identified as a secondary site. The explanatory text for the policy notes that “Such sites will be protected from development outside of those use classes indicated by the relevant categorisation... This protection policy is intended to operate in tandem with Policy CW13.”
- 4.1.17 **Policy CW13** notes that “Development proposals on industrial estates will be subject to the following restrictions:... C. On sites allocated or identified as Secondary Sites, development will only be permitted if it is:
- i. within use classes B1, B2 or B8
  - ii. an appropriate sui generis use
  - iii. to provide an ancillary facility or service to the primary employment use
  - iv. an acceptable commercial service unrelated to class B uses”
- 4.1.18 The explanatory text to the policy notes that “Examples of commercial services unrelated to use class B which might be considered acceptable would include indoor health, fitness and play facilities, training facilities, day nurseries, and a commercial and vehicle repair and maintenance business.” (para 2.31)
- 4.1.19 **Policy CW6** states that “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:
- Where arboricultural surveys are required, they are submitted and approved, including any mitigation, compensation or management requirements, as part of the planning application.



- Root systems will be retained and adequately protected for the duration of all development activity on site.
- Development proposals have made all reasonable efforts to retain, protect and integrate trees, woodlands or hedgerows within the development site.
- Where trees, woodlands or hedgerows are removed, suitable replacements are provided where appropriate.”

4.1.20 Other LDP policies of relevance include:

- Policy CW1 Sustainable Transport, Accessibility and Social Inclusion
- Policy CW2 Amenity
- Policy CW3 Design Considerations – Highways
- Policy CW5 Protection of the Water Environment
- Policy CW15 General Locational Constraints

## 4.2 Planning Policy Wales Edition 12 (February 2024)

4.2.1 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”.

4.2.2 Key sections relevant to the proposals include:

- **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.
- **Placemaking** - PPW sets out that, in order 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”.





- **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, to address a quantifiable unmet demand for the provision concerned, or qualitative. Precedence should be given to establishing quantitative need before qualitative need is considered for both convenience and comparison floorspace.
- **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.
- **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.
- **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”.
- **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”.
- **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”.
- **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”.

- **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.



## 5.0 ASSESSMENT OF EXISTING RETAIL PROVISION

### 5.1 Introduction

5.1.1 This section of the assessment presents an analysis of the vitality and viability of Blackwood Principal Town Centre, Blackwood Gate Retail Warehouse Park & Newbridge Local Centre, principally by assessing them against the measures of town centre vitality and viability identified in Technical Advice Note 4: Retailing and Commercial development.

5.1.2 The following analysis draws upon established sources of retail data (such as Experian GOAD) and our own site visits/surveys and observations.

### 5.2 The Primary Catchment Area (PCA)

5.2.1 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 built-up areas);
- 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.

5.2.2 In formulating the PCA careful regard has been paid to the shopping patterns identified in the household survey which underpins the assessment. The PCA is considered to broadly comprise Zone 5 (Blackwood) of the Caerphilly Retail Capacity Study (August 2022).

5.2.3 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 A.



### 5.3 Designated Centres

5.3.1 The focus of the assessment of existing provision has been on the following PCA based centres:

- Blackwood Principal Town Centre (including High St, Blackwood Primary Retail Area)
- Newbridge Local Centre

5.3.2 While not a designated centre, we have also described the retail provision at Blackwood Gate Retail Warehouse Park.

5.3.3 The retail centre boundary of the GOAD plan (**Appendix B**) is different to Blackwood Principal Town Centre boundary of the Caerphilly Local Development Plan (2010). The GOAD plan covers a slightly wider area and is considered for this assessment. The Blackwood Town Centre GOAD plan includes the following:

- Blackwood Principal Town Centre (including High St, Blackwood Primary Retail Area)
- Blackwood Gate Retail Warehouse Park

5.3.4 In accordance with PPW 12 and TAN4, a health-check assessment has been conducted of each of the centres, having regard to accepted vitality and viability indicators.

### 5.4 Blackwood Town Centre

5.4.1 The Caerphilly LDP identifies Blackwood as a Principal Town Centre serving the Northern Connections Corridor (NCC), which contains a number of 'urban hubs', namely Ystrad Mynach, Blackwood, Oakdale and Newbridge. The Blackwood Principal Town Centre boundary is around 500m (walking distance) from the application site.

#### Retailer Representation

5.4.2 The number of national multiple retailers within the town centre can provide a good indication of its relative strength. Blackwood retail centre benefits from a range of both local independents and national multiples. National multiple retailers within the centre include; Asda, B&M Bargains and Farmfoods.

5.4.3 This offering of national multiple retailers is complemented by a strong collection of independent retailers including; Younique Essentials, Caesars Café, Tidal's Store, Nora Viola's and Woolleys Florist.

#### Diversity Of Uses



5.4.4 CarneySweeney carried out an assessment of the composition of the retail centre in February 2025 and has investigated the composition of the town centre based on the extent of the centre outlined in the Experian GOAD plan (Appendix B).

5.4.5 The composition of units within Blackwood retail centre is set out in the table below, the figure provides a comparative view of different services within the centre against the UK average.

*Table 5.1: Diversity of Uses*

Sector	GOAD Survey July 2024		CS Survey February 2025		UK Average September 2024
	No. of Units	%	No. of Units	%	%
Convenience	19	9.60	20	10	9.32
Comparison	52	26.26	51	25.50	26.30
Retail Services	42	21.21	43	21.50	15.97
Leisure Services	40	20.20	41	20.50	25.79
Financial & Business Services	20	10.10	21	10.50	8.30
Vacant	25	12.62	24	12	14.11
<b>Total</b>	<b>198</b>	<b>100%</b>	<b>200</b>	<b>100%</b>	<b>100%</b>

5.4.6 Blackwood retail centre shows a healthy mix of charity shops, salons and has a presence of well-known convenience shops including Asda and Aldi and also independent retail shops. The highest represented category in the in the centre is comparison services of 26.26% (July 2024) and 25.5% (February 2025).

5.4.7 Convenience, retail services and financial & business services are above the UK average. Although comparison and leisure services are below the UK average, albeit this is not to be a concern, and the centre overall offers a strong range of different services.

### **Vacancies**

5.4.8 In July 2024, there were 25 identified vacant units and in February 2025 this had reduced to 24. The vacancy rate at 12.62% (July 2024) and 12% (February 2025) are below the UK average of 14.11%. This suggests that the centre is healthy, and the low vacancy rate tends to indicate a good demand for unit space.



**Accessibility**

- 5.4.9 The centre is highly accessible and served by sustainable modes of public transport, including numerous bus stops located within the town centre; bus stops along the High Street (B4251) and there is a Bus Station within the town centre.
- 5.4.10 The centre is not served by a train station. However, the Bus Station within the centre provides regular bus services surrounding areas, including Cardiff, Newport, Pontypridd, Tredegar, Cwmbran and Bargoed.
- 5.4.11 The centre is also highly accessible via private car, with the B4251 providing links to A467. The A467 is a key strategic route that connects Newport and Caerphilly and provides a direct link to the M4 Motorway. The centre is served by a high level of parking provisions, including surface level car parks at Thornacombe Road and High St.
- 5.4.12 Most of the pavements throughout the centre are well maintained and have sufficient space for less abled users. There were no dedicated cycle lanes identified during the site visit, however, the centre is served by cycle stands at the retail parks in Blackwood. In summary, the centre is regarded as easily accessible to shoppers using a variety of transport modes.

**Pedestrian Flows**

- 5.4.13 Pedestrian flows can provide a good indicator of the strength of a centre. In respect of pedestrian activity levels, the busiest observed area within the Blackwood Gate Retail Park was adjacent to the Aldi store. The highest footfall area within the Principal Town Centre was on the High Street by the entrance of the Market Place. The south of the town centre by the Texaco petrol filling station was observed to have a low footfall level, potentially due to the services provided in the area.
- 5.4.14 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.

**Environmental Quality**

- 5.4.15 The retail centre is generally tidy and well maintained. Benches were present around the retail centre, which creates a welcoming environment. Plant beds, plant pots and outside seating were present in front of some cafes within the retail centre on High Street and within the Market Place, which lifts the overall quality and amenity of the public realm. There were no major litter or graffiti issues observed in the town centre. Overall, the centre’s environmental quality is considered to be good.

**5.5 Newbridge**

- 5.5.1 Newbridge District Centre is located c.2.8km north east from the application site. Newbridge is strategically located at the crossroads of the A472 and A467. The Newbridge Town Centre



Action Plan (2010) states that Newbridge is a focus for shops for a large area of the Mid Ebbw Valley, hence why it has been recognised as a 'key settlement' within the LDP. The Local Centre is focused along High Street and Victoria Terrace and provides sufficient services and facilities to the surrounding residential population.

**Diversity Of Uses**

5.5.2 CarneySweeney carried out an assessment of the composition of the Local Centre in February 2025 and has investigated the composition of the centre based on the extent of the centre outlined in the attached plan at Appendix C for reference. It should be noted that the LDP doesn't have a defined boundary of the Newbridge Local Centre.

5.5.3 The composition of units within Newbridge Local Centre is set out in the table below. The figure provides a comparative view of different services within the centre against the UK average.

*Table 5.2: Diversity of Uses*

Sector	CS Survey February 2025		UK Average September 2024
	No. of Units	%	%
Convenience	4	5.71	9.32
Comparison	11	15.71	26.30
Retail Services	20	28.57	15.97
Leisure Services	15	21.43	25.79
Financial & Business Services	9	12.86	8.30
Vacant	11	15.71	14.11
<b>Total</b>	<b>70</b>	<b>100%</b>	<b>100%</b>

5.5.4 Newbridge Local Centre shows a high presence of salons, financial and business services. The main convenience store within Newbridge is Premier which is sufficient to provide day-to-day shopping service to Newbridge. The highest represented category in the centre is retail services at 28.57%, which is significantly higher than the UK average of 15.97%.

5.5.5 Financial & business services is also above the UK average. Although convenience, comparison and leisure services are below the UK average, this is not of concern and is within the expected levels for a centre of this scale.

**Vacancies**

5.5.6 There were ten identified vacant units during the site visit. The vacancy rate at 15.71% is slightly above the UK average of 14.11%.



**Accessibility**

- 5.5.7 The centre is accessible via private and sustainable modes of public transport. In terms private transport. The centre is well located and can be accessed from A472 and A467. The A467 connects to the M4 motorway.
- 5.5.8 The centre is served by bus services along the High Street, providing services to surrounding areas including Blackwood, Newport and Cwmbran. The Local Centre is also served by the Newbridge train station. The train service stops at Newport, Ebbw Vale Town & Maesteg.
- 5.5.9 Most of the pavements throughout the centre are well maintained. Some of the pavements in the retail centre are narrow, although, some parts of the pavements also have sufficient space for less abled users. There were no dedicated cycle lanes identified during the site visit, however, there are cycle stands present within the centre.

**Pedestrian Flows**

- 5.5.10 The observed pedestrian flow was moderately low during the site visit. The west high street was observed to have a low footfall. However, observations indicate that the shops along the Victoria Terrace generates a higher footfall compared to the other outlets within the Local Centre.

**Environmental Quality**

- 5.5.11 The retail centre is generally tidy and well maintained. Benches were present around the Local Centre, particularly by the train station, which lifts the overall quality and amenity of the public realm. There were no clear litter or graffiti issues in the Local Centre.

**5.6 Summary**

- 5.6.1 In summary, Blackwood and Newbridge retail centres appear to be in good health and are well maintained shopping environments with benches present in the centres. Blackwood retail centre displays a lower vacancy rate compared to the UK average, which is a good indication of centre health. The centres are considered to be vital and viable in servicing their respective local / neighbourhood functions. The centres are accessible by a variety of transport modes, with good levels of car parking provision, particularly in Blackwood. The public realm throughout the centres is of a good quality, kept clean and tidy and free from litter and graffiti, adding to the overall shopping experience.





## 6.0 NEED FOR THE PROPOSED DEVELOPMENT

### 6.1 Introduction

- 6.1.1 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.
- 6.1.2 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).
- 6.1.3 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.
- 6.1.4 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.

### 6.2 Quantitative Capacity

- 6.2.1 The below table provides simple convenience expenditure capacity analysis within the Primary Catchment Area (PCA – see Appendix A) 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 6.1: Capacity for Additional Convenience Floorspace to 2030, Blackwood (Zone 5)**

	2024	2030
[1] Available Convenience Expenditure in Zone 5 - Blackwood (£m)	110.8	111.0
[2] Zone 5 derived turnover of existing stores in Zone 5 - Blackwood (£m)	75.3	75.9
[3] Turnover of proposed development (£m)		11.0
[4] Turnover of Convenience Retail Commitments in Zone 5 (£m)	0	0
[5] Total Zone 5 turnover (£m)	75.3	86.9
[6a] Zone 5 (Blackwood) convenience expenditure capacity (£m)	35.5	24.1
[6b] Retained market share of Zone 5 (Blackwood) expenditure (%)	68.0	78.3

**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]

6.2.2 It can be seen from the above table existing stores are assessed to draw turnover of c.£75.3m (row 2) compared to an available (Zone 5 - Blackwood) expenditure of c.£110.8m (row 1). This indicates a proportion of available expenditure is being spent beyond Zone 5 in an unsustainable manner. It indicates there is ‘capacity’ for additional floorspace in Zone 5 to meet this locally available expenditure and increase Blackwood’s self-containment. Therefore, it is entirely sensible additional floorspace is provided locally to meet this identified need in Zone 5. The table shows through the additional provision of floorspace within Zone 5 the local market share of expenditure will be increased to a more sustainable level.

### 6.3 Qualitative Considerations

6.3.1 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.

6.3.2 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.

6.3.3 When considering ‘need’ it is crucial to note in this instance that Lidl is taking the significant commercial investment decision to develop the application site. This is, itself, a very strong indication of the pressing need for additional local food retail choice.



## Meeting Local Consumer Need

- 6.3.4 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.
- 6.3.5 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, bakery area, manager's office and customer toilets etc. Its delivery will be of direct benefit to both staff and customers alike.
- 6.3.6 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 out of centre, this location is well-established and popular as a commercial destination. This 'symbiosis' may not be able to be replicated elsewhere if permission was withheld. Delivery of the store will likely boost investor confidence in the Blackwood area.

## 6.4 Summary

- 6.4.1 Quantitative and qualitative need for the proposed development has been demonstrated. The application site is an established commercial site proposed to meet the identified need for improved local facilities. It has been demonstrated improved retail provision will increase self-containment in Zone 5 (Blackwood) and help ensure retail need is met locally. Accordingly, in respect of PPW guidance, need for the proposed development has been demonstrated.



## 7.0 THE SEQUENTIAL APPROACH TO SITE SELECTION

### 7.1 Introduction

7.1.1 The general requirements of the sequential approach to site selection are set out at paragraphs 4.3.18 to 4.3.24 of PPW12. 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.

7.1.2 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.

7.1.3 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.

### 7.2 Status of the Application Site

7.2.1 The application site falls within the defined settlement boundary for Blackwood, and it is designated as a secondary employment site. It is located in an out-of-centre location in retail policy terms.

### 7.3 Application of the Sequential Approach

7.3.1 From the outset it is important to consider the application of the sequential approach. In doing so, we have had regard to the Supreme Court decision in *Tesco Stores Ltd v. Dundee City Council* [2012] UKSC13, which forms a material consideration in the application of the sequential approach. The case considers the meaning of 'suitable' whereby the judgement held that 'suitable' relates directly to the development proposed by the applicant, subject to a reasonable level of flexibility and realism being shown by the developers. LPAs should not



require development to be altered or reduced so that it can be made to fit an alternative site, as to do so may be to make an inappropriate business decision on behalf of the developer.

- 7.3.2 The Dundee judgment is important in that it considers the focus of the local planning guidance relevant to that proposed development. It notes the focus “...is upon the availability of sites which might accommodate the proposed development and the requirements of the developer, rather than upon addressing an identified deficiency in shopping provision” (paragraph 27).
- 7.3.3 The Dundee judgement explains further: “... it would be an over-simplification to say that the characteristics of the proposed development, such as its scale, are necessarily definitive for the purposes of the sequential test. That statement has to be qualified to the extent that the applicant is expected to have prepared his proposals in accordance with the recommended approach: he is, for example, expected to have had regard to the circumstances of the particular town centre, to have given consideration to the scope for accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing. Provided the applicant has done so, however, the question remains, as Lord Glennie observed in *Lidl UK GmbH v Scottish Ministers* [2006] CSOH 165, para 14, whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site.”
- 7.3.4 In view of the above, any site being considered must therefore be suitable for the proposed development, albeit ensuring that flexibility is demonstrated (for example, number of parking spaces and servicing space, configuration of floorspace etc).
- 7.3.5 Another English appeal decision is relevant - that of a mixed-use scheme informally referred to as Rushden Lakes 1, which was an appeal recovered and allowed by the Secretary of State. As well as declaring the Dundee judgement to be 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.
- 7.3.6 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.

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<sup>1</sup> APP/G2815/V/12/2190175 - LXB RP (Rushden) Limited v East Northamptonshire Council, June 2014



7.3.7 In the Scotch Corner appeal<sup>2</sup> 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.

7.3.8 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.”*

7.3.9 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**. In any event, given that the underlying premise of this application is to provide a store to meet main food shopping requirements, breaking the proposal up into smaller elements would clearly fail to meet fundamental requirements of the development.

## 7.4 Sequential Site Search

7.4.1 The approach adopted in this sequential site assessment is consistent with the recommendations and guidance set out in PPW and TAN 4 with regard to the sequential approach to site selection. CarneySweeney has therefore conducted a sequential site search in order to ascertain whether there are any suitable, available and viable sites which could accommodate the proposed development. Bearing in mind the need for flexibility, the physical requirement to meet the needs of the proposed development have been taken to be:

- A site of at least 0.6ha that can accommodate a store in excess of at least 1,840 sqm gross to allow for provision of customer choice based on a full product range offer (this builds in considerable flexibility in respect of the development proposed);
- A site that can allow for the safe manoeuvring of customer vehicles and delivery vehicles;
- A prominent site with the ability to attract passing trade;

<sup>2</sup> APP/V273/V/15/3132873 & APP/V2723/V/16/3143678 – Land at West of the A618 Barrack Bank, Scotch Corner, Dec 2016



- A site that is easily accessible by a choice of means of transport;
- A site that is able to offer adjacent surface level car parking, so that customers can easily transfer goods to their vehicles. To have otherwise would severely impact the appeal and viability of the store;
- Provision of a dedicated service area to the store, including the ability to accommodate HGV's; and
- A single storey, open and unrestricted sales floor area which benefits from a generally level/flat topography, or which has the ability to be developed as such.

7.4.2 The sequential assessment focusses on the following:

- Blackwood Town Centre
- Newbridge Local Centre
- Blackwood Gate Retail Park

## 7.5 Assessment of Alternative Sites

7.5.1 As outlined in Section 5, the vacancy rate in Blackwood Town Centre and Newbridge Local Centre are relatively low. There were 24no. vacant units in Blackwood Town Centre and 10no. vacant units in Newbridge Local Centre at time of our survey. No available sites for redevelopment were identified within or on the edge of these centres. A list of vacant units within Blackwood and Newbridge centres are outlined in the tables below. No vacant sites or units were available at Blackwood Gate Retail Park.

Table 7.1: Vacant Sequentially Assessed Sites, Blackwood

Address	Previous Use (If Known)	Approx. Size (sq.m)
72 High Street	Unknown	90
85 High Street	Financial / Business Service	240
91 - 93 High Street	HSBC	180
99 High Street	Convenience Store	60
115 High Street	Unknown	90
139A High Street	EE	70
152 - 158 High Street	Wilko	c.1,480 at ground
160 - 164 High Street	Unknown	260
165 High Street	Unknown	20
186 High Street	Financial / Business Service	80
189 High Street	Tattoo Studio	130
195 High Street	Clothing Store	150



201 High Street	Takeaway	100
233 High Street	Financial / Business Service	70
1 The Market Place	Opticians	100
3 The Market Place	Florist	50
4 The Market Place	Barber	40
15 The Market Place	Unknown	60
18 The Market Place	Unknown	70
19 The Market Place	Unknown	60
29 Bridge Street	Tattoo Studio	60
3 Pentwyn Road	Convenience Store	100
4 Pentwyn Road	Takeaway	100
Market Place, Bus Station	Café & Takeaway	150

Notes: CS site survey Feb 2025

Table 7.2: Vacant Sequentially Assessed Sites, Newbridge

Address	Previous Use (If Known)	Approx. Size (sq.m)
10A High Street	Gift Shop	Less than 50
14 High Street	Estate Agent	60
25 High Street	Café	75
26 High Street	Takeaway	50
High Street – Adjacent Bright Financial Affiliates	Health Shop	80
High Street – In between St David's Hospice and Kurd Barbers	Brownfield	200
Kendon Building, Bank Chambers, High Street	Café & Computer Facilities	100
2 Victoria Terrace	Pharmacy	50
4 Victoria Terrace	Nail Salon	40
16 Victoria Terrace	Mobile Shop	45
8 Bridge Terrace	Church	1,000

7.5.2 Whilst the vacant units outlined above were observed to be available during the centre survey, they comprise constrained, disparate and of relatively small size. All the vacant units listed above are physically too small to accommodate the required floorspace of the proposed development which aims to provide a large retail foodstore capable of providing for main food shopping needs. Even the largest vacant unit (the former Wilco in Blackwood Town Centre) is being marketed as providing a “33,133 sq ft investment opportunity” and while this amounts to 3,081 sq m, this is over multiple floors due to the topography of the site and the fact that





the building steps up from High Street to the bus station at the rear. The site area is just 1,600 sq m and thus wholly unable to accommodate the store of 2,045 sq m, still less with associated car parking.

- 7.5.3 Furthermore, the identified units are primarily located on the traditional high street frontage within the centres. As such, they do not benefit from directly adjacent, dedicated customer parking facilities, nor (in some cases) appropriate servicing facilities for HGV access. On this basis the vacant units are, again, considered unsuitable. In summary, the units identified as part of the sequential search are deemed both **unsuitable** and are therefore discounted from the sequential site search.

## 7.6 Conclusion

- 7.6.1 Whilst both national and local planning policy require that a sequential test be applied, this must be done in a way which is compliant with recent judicial authority and policy. It is clear that the suitability of a site depends upon it being suitable to accommodate the development proposed by the applicant. The aforementioned decisions and policy context clarify that applicants do not need to disaggregate their proposals and that while flexibility must be applied, it is not for LPAs to require applicants to radically alter their proposals. Decisions on the sequential test must be applied in a 'real-world' context.
- 7.6.2 Nonetheless, 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.



## 8.0 ASSESSMENT OF IMPACT

### 8.1 Introduction

8.1.1 This section of the report considers the potential trading effects of the proposals on nearby centres.

8.1.2 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.2,045sqm gross the store's total floorspace is comfortably under the PPW threshold whereby impact assessments are typically sought. Notwithstanding this, in the interests of robustness, this section provides a proportionate impact assessment.

### 8.2 Methodology and Evidence Base

8.2.1 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. In practise the approach comprises five elements, as summarised below:

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

8.2.2 The primary catchment area (PCA) is outlined at Appendix A; this is the area in which the proposed development will draw the majority of its trade. 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**

8.2.3 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**

8.2.4 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.

- 8.2.5 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.**

- 8.2.6 Set out the likely impact of the proposal clearly, along with associated assumptions and reasoning, in respect of quantitative and qualitative issues.
- 8.2.7 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.**

- 8.2.8 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.
- 8.2.9 The assessment utilises the latest available population and expenditure projections derived from Experian and utilises a 2022 price base throughout.
- 8.2.10 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 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 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.
- 8.2.11 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**.



### 8.3 Impact on Existing, Committed or Planned In-centre Investment

8.3.1 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.

8.3.2 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 unacceptable impact.

### 8.4 Impact on Allocated Sites Outside Centres

8.4.1 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.

### 8.5 Cumulative Effects of the Development

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

### 8.6 Impact on Centre Vitality and Viability and In-Centre Turnover and Trade

8.6.1 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.

8.6.2 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.

- 8.6.3 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**

- 8.6.4 Turnover is set out in detail in at Appendix D. The annual turnover of the proposed development is assessed to be £11.9m in 2030 (allowing for inflow). The convenience turnover (allowing for inflow) is assessed to be £11.2m in 2030.

### **Expenditure Growth**

- 8.6.5 The tables at Appendix D apply the estimates of 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.
- 8.6.6 Analysis of expenditure growth can help provide an indication of the potential impact of a proposal. The tables (3a-3a Appendix D) demonstrate the underlying position is one in which available convenience expenditure is expected to grow to 2030, albeit modestly.
- 8.6.7 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.
- 8.6.8 As such, the remainder of this analysis focuses on the quantitative effect of proposed additional convenience floorspace.



## Trading Assessment

- 8.6.9 This section of the statement considers the potential impact that the proposal may have on the pattern of retail expenditure in the surrounding area.
- 8.6.10 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.
- 8.6.11 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.
- 8.6.12 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.
- 8.6.13 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.
- 8.6.14 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.
- 8.6.15 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.

8.6.16 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

8.6.17 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.

8.6.18 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, competing centres/stores within the period to 2030. Table 8 highlights that the proposed development is anticipated to compete predominantly with the Aldi store at Blackwood Gate Retail Park and Sainsbury's at Newbridge Rd. Both stores are unprotected in retail planning terms. The Aldi store is currently trading above benchmark level and will continue to trade strongly post development (at around benchmark level).

8.6.19 Table 8 at Appendix D demonstrates the effect of the proposed foodstore is anticipated to be predominantly felt by large and/or comparably scaled foodstores, which are well equipped to absorb the trading effect. The impact on Blackwood and Bargoed town centres would be just 4.1% which cannot be considered significantly adverse.

8.6.20 It should also be recalled that PCA population and expenditure will grow in the period to 2030 which will help offset or mitigate the impact arising from trade diversion to the proposed foodstore over the same period.

8.6.21 Having regard to the role, function, and vitality and viability of existing centres, the assessed levels of impact are not considered to be significantly adverse. In respect of impact on out of centre facilities, as outlined, these derive no protection from the planning system and need not be considered in further detail. Irrespective, they are well equipped to absorb the assessed trade diversion.



## 8.7 Summary

- 8.7.1 In summary, the assessed impact of the proposed development is within acceptable levels. Existing stores are well equipped to absorb the relatively modest anticipated trading impact, which will be offset by a growth in population and retail expenditure in 2030. It has been demonstrated the proposed development does not result in any significant adverse impact on in-centre turnover and trade.





## 9.0 NON-RETAIL PLANNING ISSUES

### 9.1 Introduction

9.1.1 This section addresses other planning policy matters relating to the proposed development, namely:

- Principle of Development
- Sustainability
- Highways & Access
- Car Parking Provision
- Design & Landscaping
- Flood Risk & Drainage
- Ecology and Green Infrastructure
- Noise
- Trees
- Economic Benefits

### 9.2 Principle of Development

9.2.1 The entire site, which comprises brownfield land, lies within the defined settlement boundary for Blackwood, a Principal Town in the settlement hierarchy.

9.2.2 The site is a secondary employment site under Policy EM2. However, Policy CW13 allows such sites to be used for ‘acceptable commercial service unrelated to class B uses’ and gives examples of such uses as including ‘commercial and vehicle repair and maintenance business’. It is clear, therefore that the site is currently being used as a commercial service unrelated to class B uses – its redevelopment, therefore, would not result in the loss of an employment facility as such. Furthermore, the enclosed Market Appraisal concludes that:

- there is a significant supply of employment land within Caerphilly County Borough;
- there is a large number of industrial units on the market, comparable in size and location yet with better accessibility, eaves height and level of refurbishment than the subject site. It is likely occupiers looking for space would favour these opportunities over the subject site; and
- development appraisal analysis indicates that the site is not viable for employment related redevelopment.



- 9.2.3 It is also important to note that PPWv12 and TAN23 Economic Development were adopted subsequently to the adoption of the LDP. TAN23 notes that:

*“Planning Policy Wales (PPW) defines economic development broadly so that it can include any form of development that generates wealth, jobs and income. In producing development plans or determining planning applications local planning authorities need to bear in mind that traditional business use, classes B1-B8, only account for part of the activity in the economy. It is important that the planning system recognises the economic aspects of all development and that planning decisions are made in a sustainable way which balance social, environmental and economic considerations.*

*“In the full context of PPW, therefore:*

*Economic development is development (new or change of use) where the resulting space will be occupied by economic activities;*

*An economic activity, or economic land use, is an activity which directly generates wealth (output), jobs and income;*

*Generating jobs includes providing or sustaining existing jobs as well as creating new jobs.”*

- 9.2.4 Indeed, PPW paragraph 5.4.2 states: *“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... The Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim.”* (our underlining)
- 9.2.5 As noted in Section 4, above, Future Wales (which is part of the statutory development plan) makes reference to the ‘Economic Action Plan’ and notes that this supports the delivery of Prosperity for All – the national strategy for Wales. Future Wales notes that the “foundation sectors include tourism, food, retail and care” and that “Future Wales supports and helps deliver the aims of the Economic Action Plan. Future Wales:... supports the foundational economy”.
- 9.2.6 Given this development plan and national policy recognition that retail is a form of economic development and part of the foundational economy, it follows that retail should comprise an ‘acceptable commercial service unrelated to class B uses’, as specifically



allowed for under Policy CW13 on secondary employment sites, such as the application site.

9.2.7 Accordingly, the proposed development:

- will employ 40 people (FTE)
- is in line with the definition of “economic development” given in PPW (para 5.4.2) and TAN23 (para 1.1.4);
- is noted as a foundation sector in the Welsh Government’s “Prosperity for All: Economic Action Plan” document, mentioned at page 14 of Future Wales (which itself is part of the Development Plan); and thus
- comprises an ‘acceptable commercial service unrelated to class B uses’, as allowed for in secondary employment locations by Policy CW13.

9.2.8 A further material consideration is that the proposal will not result in the loss of a meaningful employment facility (employing just 5 posts currently, soon set to reduce to zero). We therefore consider the proposal of the development proposed to be acceptable.

## 9.3 Sustainability

9.3.1 It is considered the application site occupies an inherently sustainable location, with excellent links to surrounding settlements, established services and facilities and sustainable transport routes. As highlighted in the preceding sections, the site is located approximately 0.85 km southeast of Blackwood town centre which offers a wide range of services and facilities. Therefore, the development occupies a wholly sustainable location and complies with the principles of sustainable settlement patterns.

9.3.2 In terms of access to sustainable forms of public transport, the nearest bus stops lie within 200m from the site to east on Maes yr Afon and Penmaen Road, providing hourly access to the No5 bus service between Blackwood and Pant Estate. The ‘Blackwood Gate Retail Park’ stop is also located an approximate 500m walk west of the site, which provides access to a much greater range of bus services. Although located slightly beyond the IHT suggested 400m distance, this distance is not definitive, and the stop would still be very accessible for users of the site. The ‘Blackwood Gate Retail Park’ stop provides access to all the key bus services routing through the Blackwood area. These bus services route locally, while also routing wider through to areas such as Cardiff, Newport, and Cwmbran. These services provide regular bus travel opportunities across the week, with service 151



(Newport to Blackwood) in particular, running as frequently as every 15-minutes on weekdays, and 30-minutes on Saturdays.

9.3.3 The site is located within cycle distance to a large residential population, and offers viable opportunities to support cycle travel, especially for staff commuting trips.

9.3.4 The proposed store will meet Lidl's high sustainability standards which are intended to minimise environmental impact over the lifetime of the store:

- Store heating and lighting systems will be controlled by a computerised Building Management System (BMS) to minimise energy consumption;
- Motion sensors throughout our warehouses minimise electricity consumption and flow control devices are used to limit excess water usage;
- The car park lighting is switched off overnight and is controlled by a lux sensor during trading hours;
- Lidl's refrigeration plant has low carbon emissions ratings and operates without the need for chlorofluorocarbons;
- Chilled food cabinets use night blinds to save energy overnight;
- All stock movement within stores is manual, avoiding unnecessary energy usage or noise pollution;
- The store will have two rapid Electric Vehicle charging points, which can provide 80% charge within 30 minutes;
- The Lidl store will feature solar panels on its roof to help with the store's energy needs. The development includes 384 panels which produce 180kw at peak times;
- Delivery vehicles are used to remove waste from the store on their return journey to the nearest Regional Distribution Centre, where the waste/ recyclable material is sorted and managed centrally. This also helps to reduce vehicle trips to each store;
- Lidl are sector leaders in terms of recycling management with all cardboard and plastic produced from stores being recycled back into boxes and carrier bags, ready to be used again.

9.3.5 In summary, the proposed development site occupies a highly sustainable location, in close proximity to nearby services and facilities. Furthermore, the site is advantageously located to take advantage of sustainable transport links, including public transport routes and active travel opportunities. The whole of Lidl's operation sets high sustainability standards to minimise environmental impact over the lifetime of the store.



## 9.4 Highways & Access

- 9.4.1 A Transport Assessment has been prepared by Corun Associates in support of the application and examines the highway and transportation issues associated with the proposed development.
- 9.4.2 The re-development of the site would see the existing vehicle access arrangements removed and replaced with a newly developed access junction along the B4254 in the north of the site. The new junction will comprise a priority arrangement with a dedicated lane for right turners into the site, an overall width of 10.5m, and kerb radii of 6m. Visibility splays from the site access of 2.4m x 59.1m to the west and 2.4m x 61.2m to the east can be provided, in line with the recorded speeds of 37.2mph and 35.6mph respectively.
- 9.4.3 To ensure delivery vehicles can safely enter and exit the site at the proposed new access junction, a slight widening of the B4254 carriageway is required in the immediate vicinity of the site. To accommodate HGV movements at the site, and also to ensure bus movements can remain unaffected through the Maes Yr Afon junction (which lies along a bus route), the existing pedestrian refuge island to the east of the proposed access junction will also be amended and widened slightly. This amendment will not impact on the pedestrian desire line for this crossing, with the widening providing an improvement to pedestrian users. To further promote pedestrian movements west of the site along the B4254, a further pedestrian refuge island will be provided directly west of the proposed new site access junction.
- 9.4.4 The new site access junction will include direct pedestrian links into the existing footway running along the southern edge of the B4254. A further pedestrian connection will also be provided in the east of the site, connecting directly into the existing footway running along the western edge of Penmaen Road.
- 9.4.5 A robust highway impact assessment has been undertaken identifying that that a typical commercial warehousing unit use would be anticipated to generate a total of 92 total two-way non-operational vehicular trips over the 12-hour weekday period, with between approximately 4 to 11 two-way vehicle trips per any individual hour period. At a robust estimate, the volume of primary new trips generated by the proposed foodstore unit could be considered no more than approximately 10% of the total trip generation. Based on the anticipated weekday 12-hour trip generation outlined in Table 5.1, no more than approximately 200 trips at the proposed foodstore unit would therefore be anticipated as primary new trips generated on the highway network over this period. This is in the region



of the volume of movements that the extant use could generate. A similar impact would also be anticipated over the weekend period.

9.4.6 When considering only primary new trips generated at the site, the proposed re-development would therefore be anticipated to generate a negligible change in vehicle trip generation on the highway network, in comparison to the fall back scenario.

9.4.7 The Transport Assessment considers the impact of the development on four nearby junctions:

- Junction 1 – Signalised junction (4-arm) with B4254 (east arm) / B4251 Blackwood Road / B4254 Libanus Road / B4251 High Street;
- Junction 2 – Priority junction (3-arm) with B4254 (major arms) / Penmaen Road (minor arm);
- Junction 3 – Roundabout junction (4-arm) with A4048 (east arm) / B4251 / B4254 / A4048 (north arm); and
- Junction 4 – Roundabout junction (4-arm) with A4048 (south arm) / Woodfield Terrace / A4048 (north arm) / Oakdale Terrace.

9.4.8 All assessed junctions would be expected to operate within theoretical capacity with the development in operation, in each of a 2025, 2030, and 2035 forecast year respectively, with the addition of the proposed development traffic through the junction anticipated to have a negligible impact on overall junction performance.

9.4.9 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.

9.4.10 In summary, the Transport Statement demonstrates that the development should be considered acceptable in terms of highways and transportation and there are no reasons why the proposed development should not be granted consent. The proposed development is therefore compliant with Policy CW3 of the LDP.

## 9.5 Parking Provision

9.5.1 A total of 114 car parking spaces are proposed at the new Lidl foodstore unit. These are within the maximum guidelines identified by local guidelines set out in CCBC's Supplementary Planning Guidance (SPG) document 'Car Parking Standards' adopted in January 2017. Based on the operator's extensive experience of demand at stores



throughout the UK, this level of provision is considered to be appropriate for the intended food store use.

- 9.5.2 A total of 15 enhanced parking bays (6 disabled and 9 parent and child) are proposed. This represents 13% of the total provision. These spaces are conveniently located near the proposed store entrance and will include a buffer strip around each space to assist with access, especially for wheelchair users.
- 9.5.3 A total of 6 Sheffield cycle stands (allowing parking for up to 12 bicycles), and 2 electric vehicle 'rapid charger' charging spaces are also included within the proposals. These will help encourage these more sustainable modes of travel to the site. This provision of EV charging is deemed appropriate for the proposed development, will support the aims of both national and local policies to promote use of these vehicles and will assist with developing a network of accessible charging points across the country.

## 9.6 Design & Landscaping

- 9.6.1 The application is accompanied by a Design and Access Statement (DAS) which explains the site, its surroundings, the design constraints and design rationale for the proposed development.
- 9.6.2 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 the B4254 adding natural light to the shopping environment and modernizing the visual appearance.
- 9.6.3 The proposed 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.
- 9.6.4 Perimeter landscaping and proposed new landscaped areas will border the site, adding visual interest and softening the schemes appearance. The landscaping will comprise 33 new trees and 25 linear metres of hedging, as well as 723 sq m of planting beds. For detailed landscaping proposals please refer to the Landscape Proposals Drawing Ref: CA-2025-LIDL-BKWD -03, 04 and 05. 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.



Revisions to the management plan will be made as necessary to assist successful establishment.

- 9.6.5 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 Policy SP6 Place Making of the LDP.

## 9.7 Ecology and Green Infrastructure

- 9.7.1 An Ecological Impact Assessment (EclA) has been prepared by Lucion in support of the application which presents the findings of an ecological appraisal of the site and the mitigation measures required to prevent, reduce or offset any significant adverse effects and the likely residual effects after these measures have been adopted, as well as any proposed enhancement measures.
- 9.7.2 In terms of designated sites, the EclA confirms that the site has no relevant designation, albeit a number of national, local and non-statutory designations are within 2km of the site. There are no records of Priority Habitats within or bordering the site.
- 9.7.3 The Site itself comprises modified grassland, bare ground, individual trees, developed land/ sealed surface and two buildings. The habitats present on-Site are widespread on both a local and national scale, with none of the habitats being considered rare.
- 9.7.4 The construction phase will result in the loss of some suitable bird nesting and foraging habitat associated with the scattered trees in the eastern section of the Site. Suitable habitat will be removed either outside the main nesting bird season, or subsequent to a nesting bird check by a suitably experienced ecologist immediately prior to removal. Further, appropriate mitigation through the implementation of the proposed landscaping strategy, and the provision of at least three nest boxes for species of local importance to the Site is anticipated to result in a negligible effect for birds in the local area that is of neutral significance.
- 9.7.5 The Site is considered to be of low potential for foraging/commuting bats, as the Site is largely devoid of vegetation and subject to high levels of noise and artificial light disturbance. The buildings and trees were assessed as having negligible suitability to support roosting bats. Any bats which may utilise the Site are likely to be relatively light-tolerant species only. It is assumed that a low-level light spill will be implemented on Site during construction to reduce disturbance to commuting and foraging bat species. Following the implementation of appropriate low-level lighting the development will have a negligible effect of neutral significance for bats.





- 9.7.6 The Site offers suitable foraging and commuting habitat for hedgehogs. However, during the time of the site walkover, there was no evidence recorded of hedgehog presence. This does not mean that hedgehogs won't use the site as there was plenty of sheltering opportunities for the species. It is therefore recommended that precautionary working methods are implemented during removal of any vegetation and best practice measures are utilised during the construction phase to ensure individuals don't become trapped in any open excavations.
- 9.7.7 Based on the ecological survey work undertaken to date there is nothing to suggest that the proposed development will lead to a significant impact on any known protected species or ecological features. It is considered that with careful design considerations and appropriate mitigation measures the development proposals will secure a Net Benefit for Biodiversity through the provision of native shrubs/scrub, ornamental planting beds, scattered trees and hedgerows on-Site. These habitats would provide an extension as well as buffer to semi natural habitats currently adjacent to the Site and will increase the species and structural diversity on-Site, thus contributing to a Net Benefit for Biodiversity.
- 9.7.8 A Green Infrastructure Statement (GIS) has also been prepared which explains that the site itself has limited ecological value. The proposed site will provide connectivity internally by planting on all boundaries with the inclusion of trees and native shrubs and hedges together with other berrying and fruit bearing plants and pollinators.
- 9.7.9 The GIS further explains how soft landscape will act as a nature conservation area with native trees and shrubs. The trees proposed for the site frontage will be a positive element both visually, for biodiversity and uplifting the feeling of the area. Sparrow terrace bird boxes will also be attached to the store building.
- 9.7.10 The GI statement concludes that the site will provide an improvement in connectivity by planting on all boundaries, which link to off-site vegetation to the north and east along the B4254 and Penmaen Road. Considering the location of the Site and the Site's current low ecological value with limited diversity, will provide a biodiversity net gain..

**9.8 Noise**

- 9.8.1 A noise assessment has been prepared by Inacoustic in support of the application. The noise assessment considers noise associated with mechanical services and plant equipment, delivery vehicles and customer vehicles in the car park.
- 9.8.2 It should be noted that the air-conditioning, heating and cooling plant will operate only during daytime hours (07:00 hours to 23:00 hours). Only the mechanical plant associated



with refrigeration operates during all periods of the day and night, according to demand. In terms of delivery frequency to the store, it is understood that there is likely to be up to two heavy goods vehicles deliveries and two to three light goods vehicle deliveries per day, with no more than one HGV delivery being undertaken in any single hour.

- 9.8.3 The noise assessment sets out a number of mitigation measures that are proposed which include the provision of a 2.4 metre high solid barrier along the southern boundary.
- 9.8.4 The noise assessment confirms that the installation of specified plant for the store will comprise a “low impact” in the context of the guidance set out in BS4142:2014+A1:2019, during both the daytime and night-time period, when taking into account the noise mitigation measures proposed.
- 9.8.5 In terms of noise from vehicle deliveries during the day, the Noise Assessment predicts noise from deliveries, added to the noise generated by the static plant, during the day would equate to no significant increase in ambient sound level during the daytime.
- 9.8.6 The assessment identifies that peak anticipated use of the car park would not significantly increase noise at the closest and most potentially-affected receptors, equating to an imperceptible, negligible impact. It should also be noted, that the predicted specific noise level arising from the cumulative activities is also substantially below the measured LA90 background sound level in the area.
- 9.8.7 The noise assessment concludes that the potential noise impacts associated with the proposed development can be adequately controlled by appropriate design and mitigation and therefore noise should not be considered a constraint to the granting of planning permission for the proposals. We concur with this view and consider the proposed development incorporates suitable design mitigation to ensure it will result in no unacceptable impact.

## 9.9 Drainage

- 9.9.1 The site is located within Flood Zone A on the Welsh Government Development Advice Map – an area considered to be at little or no risk of fluvial or tidal flooding, with a less than 0.1% (1 in 1000) annual probability of flooding. The NRW ‘Flood Map for Planning’ shows that the site is located within an area outside of the extreme flood extent (Flood Zone 1), meaning it has a less than 0.1% annual probability of flooding.
- 9.9.2 The risk of flooding from all sources is very low and as such, no flood risk mitigation measures are deemed necessary.



- 9.9.3 Both the existing and proposed development include areas of impermeable drainage area in the form of buildings, hardstanding, car parking and site access. A new sustainable drainage system is proposed in order to comply with the Statutory Standards for SuDS and create betterment over the existing situation.
- 9.9.4 All methods of surface water discharge have been assessed. Infiltration techniques are not considered feasible due to the presence of clay. There are no nearby watercourses or public surface water sewers. As such, discharge of surface water to the highway sewer is proposed.
- 9.9.5 It is proposed to limit the discharge to a rate of 34.69 l/s (1 in 2 year greenfield rate, a proxy for QBar). This will provide significant betterment over the existing 1 in 1 year brownfield runoff rate of 61.4 l/s.
- 9.9.6 Attenuation storage will be required on site in order to restrict surface water discharge to 4.69 l/s. Attenuation can be provided within the lined sub-grade of the permeable surfaced car parking spaces and Cellular Storage Crates. Permeable surfacing will provide treatment to runoff.
- 9.9.7 Foul flows will be discharged to the public combined sewer, as agreed with DCWW.
- 9.9.8 On the basis of the Drainage Strategy we consider that the proposal complies with criterion 3 of LDP Policy GN.2 Sustainable Design.

## 9.10 Trees

- 9.10.1 An Arboricultural Report has been prepared by ArbTS in support of the application. The survey identified 3 no. individual trees and 6 no. tree groups at the application site. Of the individual trees, 1 no. was assessed as Category B (moderate quality and value) and 2 were assessed as Category C (low quality and value). All of the tree groups were assessed as Category C.
- 9.10.2 A Tree Constraints Plan has been prepared by ArbTS in support of the application. In order to identify the above and below ground constraints presented by existing retained trees at the site, the locations, numbers and assessed category of these trees, together with their crown spread and root protection areas (RPA) have been summarised and plotted on to the Tree Constraints Plan. This drawing is included in Appendix 2 of the Arboricultural Report.
- 9.10.3 The Arboricultural Report explains that the tree groups along the eastern boundary (G1) and southern boundary (G4) comprise overgrown boundary high hedgerows with limited value and a limited future, which have been topped by pruning in the past with their sides left



unmanaged and wide in form. Consequently, limited management options are now available. Furthermore, a number of structural defects have been noted throughout the groups. All but one of these trees are low-quality trees (C Category) and do not therefore present a constraint on developing the site. The one moderate-quality tree (B Category = T2) is actually located off-site to the south.

- 9.10.4 The Arboricultural Report advises that providing construction is undertaken in compliance with the tree protection scheme as set out in the report, there will be no significant long-term adverse Arboricultural impact on the health of any retained trees on or adjacent to this site or the long-term amenity of the area.
- 9.10.5 As noted above, the proposed landscaping will include 33 new trees planted on site. The proposal is in compliance with Policy CW6 of the LDP.

## 9.11 Economic Benefits

- 9.11.1 As noted above, TAN 23 defines economic development broadly so that it includes any form of development that generates wealth, jobs and income. TAN 23 states the economic benefits of proposals and market needs should be fully considered when determining planning applications (paragraphs 1.2.1-2).
- 9.11.2 PPW and Future Wales recognise the role that retailing plays in supporting the economy. In PPW economic development is defined as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes (paragraph 5.4.1). 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 (paragraph 5.4.2). Future Wales specifically supports the foundational economy of which retail forms a part (page 14).
- 9.11.3 The store will deliver up to 40 new local jobs (Full time Equivalent). In March 2025, Lidl's starting hourly pay rose to £12.75 per hour for colleagues working in stores outside London. Lidl GB's hourly pay rates for colleagues also increase with length of service, with pay reaching £13.65 nationally and £14.35 within London. These top rates are among the highest hourly pay amounts in the industry.
- 9.11.4 As well as competitive pay, Lidl GB also offers colleagues numerous other benefits including enhanced holiday entitlement, life assurance and optional health and dental insurance. Lidl GB is the only discounter to offer a colleague discount in store and has the most competitive maternity pay package in the sector.
- 9.11.5 Lidl does not operate zero hours contracts.



- 9.11.6 All Lidl recruitment specifically targets the store's primary catchment areas (usually less than a five-minute drive from the store). This means that around 80% of the jobs will be filled locally, providing a real boost to the local economy.
- 9.11.7 All of the foregoing will positively impact local employment opportunities and comprise an economic benefit.



## 10.0 CONCLUSION

10.1.1 This planning and retail statement has been prepared by CarneySweeney on behalf of the applicant, Lidl Great Britain Ltd., in support of a full planning application to be submitted to Caerphilly County Borough Council for the demolition the former bus depot and the erection of a new Lidl foodstore, access, car parking, landscaping and all associated works.

10.1.2 In light of the above findings we make the following conclusions:

- The proposed development constitutes an ‘acceptable commercial service unrelated to class B uses’, as specifically allowed for under LDP Policy CW13 on secondary employment sites, such as the application site, fully in line with development plan (Future Wales) and national policy recognition that retail is a form of economic development and part of the foundational economy.
- Quantitative and qualitative need for the proposed development has been demonstrated. The proposed development will meet the identified need for improved local facilities. It has been demonstrated improved retail provision will help counteract an outflow of expenditure and help ensure retail need is met locally.
- 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 assessed impacts of the proposed development are within acceptable levels, most of which fall on out of centre, unprotected destinations/facilities. These stores are equipped to absorb the relatively modest anticipated trading impact. It has been demonstrated the proposed development does not result in any significant adverse impact on in-centre turnover and trade; in particular there is no evidence to suggest it will unacceptably affect the vitality and viability of Blackwood Town Centre where an impact of just 4.1% is predicted.

10.1.3 The proposal is considered acceptable in all other technical aspects including accessibility/car parking; flood risk and drainage; ecological impact; design and landscaping.

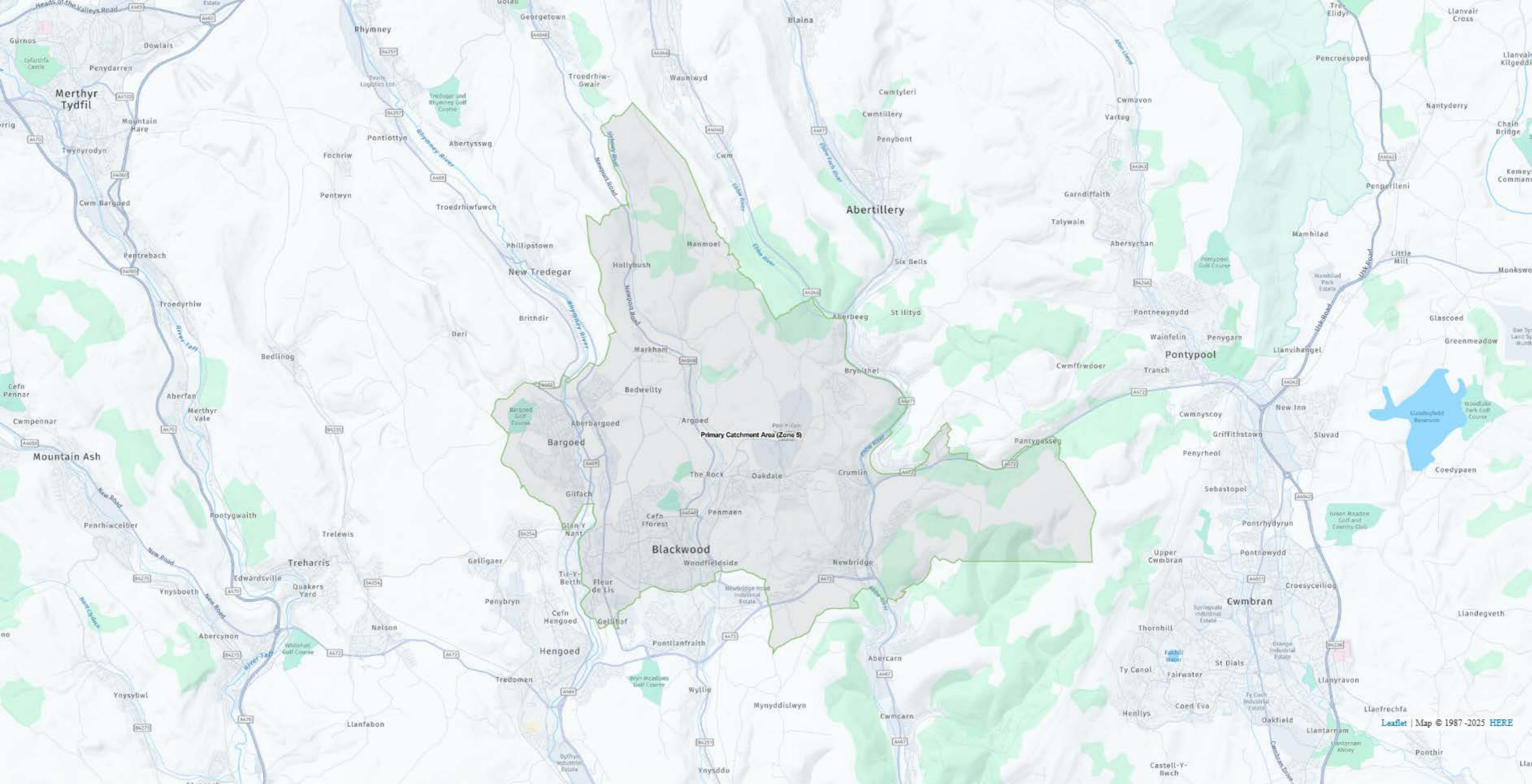
10.1.4 The proposed development’s accordance with planning policy at all levels provides an overall balance of consideration which weighs firmly in favour of permitting the current proposals.




## Appendix A – Primary Catchment Area (PCA)







**Legend**

-  Primary Catchment Area (Zone 5)

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## Appendix B – Blackwood Town Centre GOAD Plan









43 metres

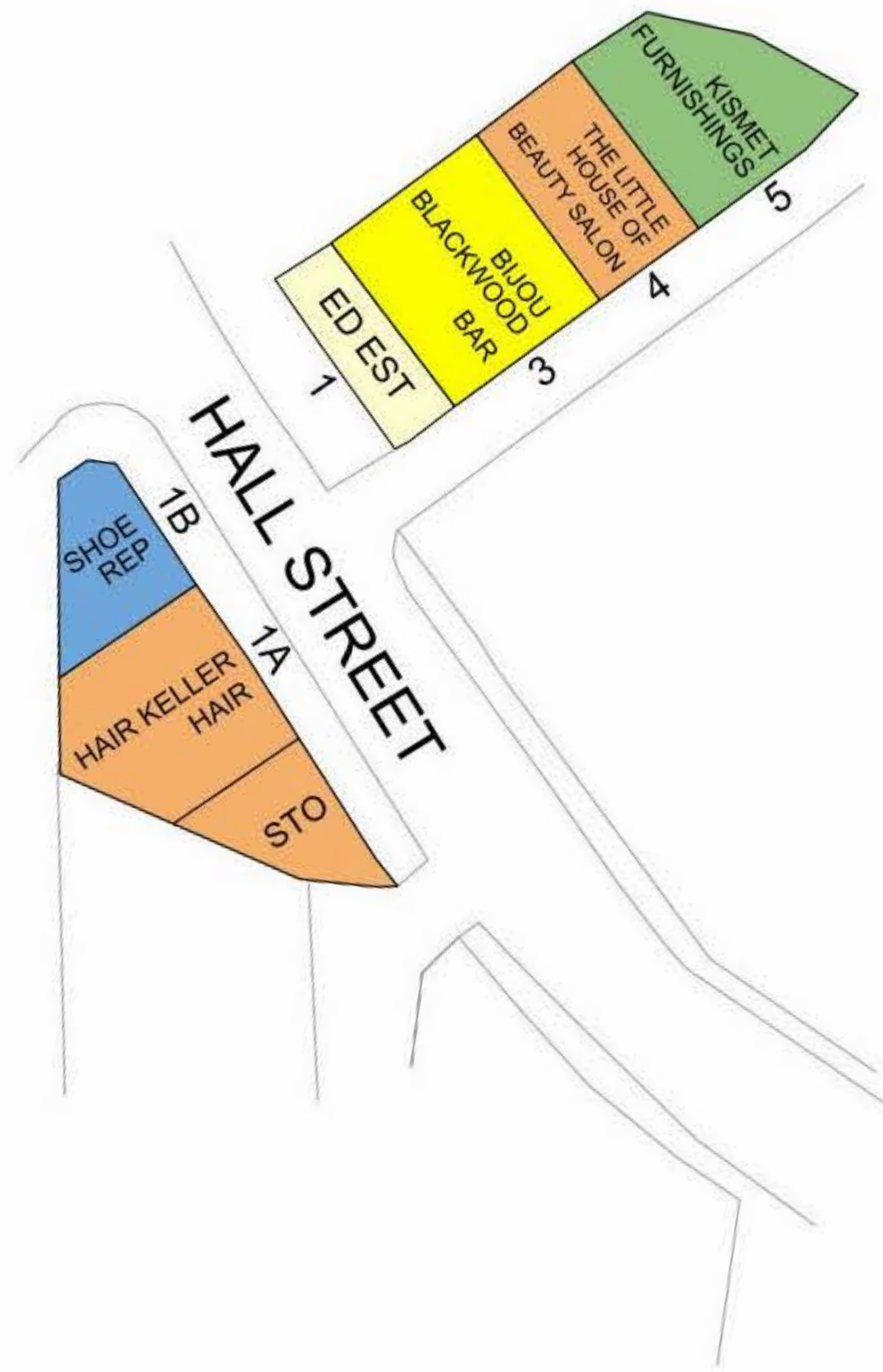
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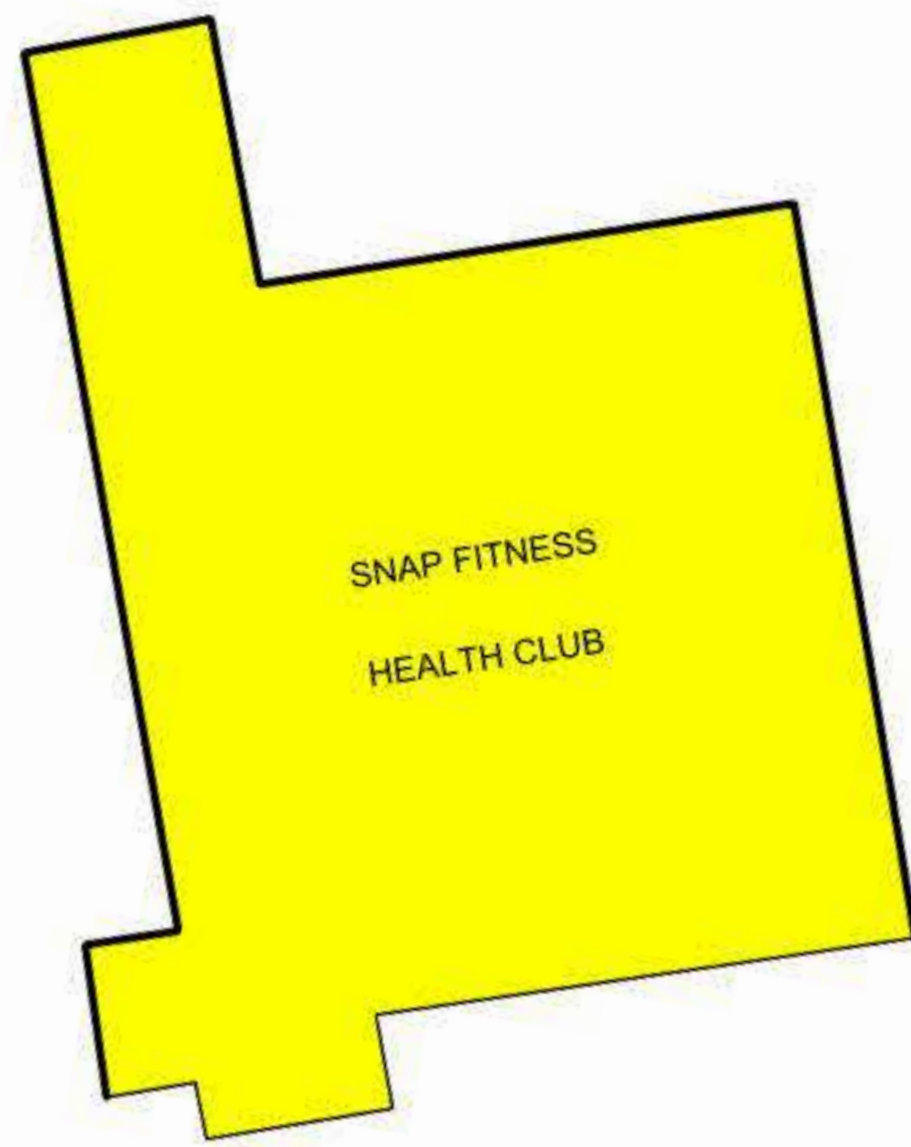
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# Lower Floor





Floor One



## Appendix C – Newbridge Local Centre Plan





## Appendix D – Statistical Tables





Lidl Great Britain Ltd  
 Stagecoach Depot, Pontllanfraith, Blackwood,

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	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
<b>Total</b>	<b>215,618</b>					<b>219,271</b>	<b>3,653</b>	<b>1.7</b>

Notes:

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

[3] = [2] - [1]

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

Lidl Great Britain Ltd  
 Stagecoach Depot, Pontllanfraith, Blackwood,

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

Zone	2025	2026	2027	2028	2029	2030
Zone 1 Caerphilly	2,221	2,213	2,208	2,206	2,204	2,202
Zone 2 Risca/Pontyminster	2,276	2,267	2,263	2,260	2,258	2,256
Zone 3 Nelson	2,220	2,211	2,206	2,204	2,202	2,200
Zone 4 Ystrad Mynach	2,189	2,180	2,176	2,174	2,172	2,169
Zone 5 Blackwood	2,191	2,182	2,178	2,176	2,173	2,171
Zone 6 Rhymney	2,092	2,083	2,079	2,077	2,075	2,073

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 store

2022 prices

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

Zone	2025	2026	2027	2028	2029	2030	Change 2025-30	
							£m	%
	[1]					[2]	[3]	[4]
Zone 1 Caerphilly	120.1	120.4	120.9	121.5	122.2	122.8	2.7	2.3
Zone 2 Risca/Pontyminster	73.3	73.0	72.9	72.9	73.1	72.8	-0.5	-0.7
Zone 3 Nelson	51.6	51.8	52.0	52.3	52.3	52.9	1.2	2.4
Zone 4 Ystrad Mynach	71.3	71.3	71.3	71.5	71.6	71.8	0.5	0.6
Zone 5 Blackwood	110.8	110.6	110.6	110.7	110.9	111.0	0.2	0.2
Zone 6 Rhymney	48.0	47.8	47.7	47.7	47.7	47.6	-0.4	-0.7
<b>Total</b>	<b>475.1</b>	<b>474.8</b>	<b>475.5</b>	<b>476.6</b>	<b>477.8</b>	<b>478.9</b>	<b>3.7</b>	<b>0.8</b>

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	96.06	96.29	96.72	97.23	97.75	98.26
Zone 2 Risca/Pontyminster	58.64	58.43	58.33	58.29	58.51	58.21
Zone 3 Nelson	41.32	41.42	41.61	41.84	41.82	42.29
Zone 4 Ystrad Mynach	57.06	57.00	57.07	57.19	57.31	57.43
Zone 5 Blackwood	88.64	88.48	88.49	88.60	88.70	88.81
Zone 6 Rhymney	38.39	38.25	38.18	38.16	38.13	38.10
<b>Total</b>	<b>380.1</b>	<b>379.9</b>	<b>380.4</b>	<b>381.3</b>	<b>382.2</b>	<b>383.1</b>

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	24.0	24.1	24.2	24.3	24.4	24.6
Zone 2 Risca/Pontyminster	14.7	14.6	14.6	14.6	14.6	14.6
Zone 3 Nelson	10.3	10.4	10.4	10.5	10.5	10.6
Zone 4 Ystrad Mynach	14.3	14.3	14.3	14.3	14.3	14.4
Zone 5 Blackwood	22.2	22.1	22.1	22.1	22.2	22.2
Zone 6 Rhymney	9.6	9.6	9.5	9.5	9.5	9.5
<b>Total</b>	<b>95.0</b>	<b>95.0</b>	<b>95.1</b>	<b>95.3</b>	<b>95.6</b>	<b>95.8</b>

Notes:

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

**Lidl Great Britain Ltd**  
**Stavecoach Depot, Pontin/Frith, Blackwood.**

**Table 4: Convenience Turnover of Existing Facilities**

	Zone 1		Zone 2		Zone 3		Zone 4		Zone 5		Zone 6	
	Main	Top Up	Main	Top Up	Main	Top Up	Main	Top Up	Main	Top Up	Main	Top Up
<b>Zone 1</b>												
ASD, Calagher Retail Park, Caerphilly, CF83 3GK	9.93%	9.64%	5.19%	2.93%	0.80%		1.16%	2.23%	0.20%			0.47%
ASD, Wilkies Retail Park, Upper Boat, Pontonville, CF37 5BL	1.04%		0.93%		0.48%				0.81%			
B&M Bargains, Bedwas Road, Caerphilly, CF83 3AX												
Heron Frozen Foods, Castle Court Shopping Centre, Caerphilly, CF83 1JU	1.04%		2.25%		1.80%			0.47%				
Home Bargains, Pentywedy Road, Caerphilly, CF83 3HF												
Island Road Warehouse, Midway Retail Park, CF37 5BL												
Island, Cardiff Road, Caerphilly, CF83 1JN	3.36%	1.73%	1.87%									
Lidl, Bredou Way, off Nantgarw Road, Caerphilly, CF83 2AX	13.90%	13.11%	2.28%	4.85%			0.25%					0.47%
Tesco Express, Breinllyf Road, Caerphilly, CF83 2JD	3.59%	4.69%			0.32%							
Tesco Express, Castle View, Caerphilly, CF83 1SN	1.44%	1.80%	0.48%									
Tesco Extra, Gelli Hirion Industrial Estate, Pontonville, CF37 5SN	1.80%	0.70%			1.13%		0.67%					0.81%
Tesco Superstore, Calagher Retail Park, Caerphilly, CF83 3NK	6.77%	4.60%	7.63%	5.56%	1.34%							
Caerphilly town centre		5.02%	0.97%	2.47%			0.25%					0.30%
Taff's Wells village centre		0.70%										
Abertridwr		3.02%										
Llanbradach		1.04%										
<b>Zone 2</b>												
ASD, Breerchaqe, Risca, NP11 6NP			13.74%	5.55%			2.02%	0.47%	0.51%			0.47%
ASD, Pentywedy Road, Caerphilly, CF83 3DX	21.62%	11.27%	9.91%		0.80%		2.14%		1.65%			
Co-op, Church Street, Caerphilly, CF83 3ED		3.25%		1.80%								
Co-op, Commercial Road, Machen, Caerphilly, CF83 8PG			0.24%	4.88%								
Lidl, Commercial Street, Risca, NP11 6AW			6.92%	11.35%			3.33%	2.66%	0.81%		0.42%	
Tesco Express, Riverbank Newport Road, Caerphilly, CF83 8BY			0.24%	2.55%								
Tesco Extra, Pentywedy Industrial Estate, Pentywedy, NP11 6NP			22.56%	11.99%			4.74%	5.84%	2.36%		1.74%	
Bedwas town centre				0.91%								
Crosskeys village centre				4.02%								
Risca/Pentywedy town centre				9.59%			1.02%				1.74%	
<b>Zone 3</b>												
ASD, New Road, Tynyberth, CF82 8AU			0.46%	10.18%	2.74%		5.32%	0.47%	3.50%	1.67%	3.38%	0.77%
Co-op, Commercial Street, Nelson, CF46 6NF				2.14%	18.86%							
Co-op, Fox Street, Treham, CF46 5HE				2.17%	9.92%							
Co-op, Main Road, Nelson, CF46 6PE				3.22%	8.27%			0.47%		1.67%		1.15%
Nelson village centre					6.26%							
Treham's town centre				1.53%	10.72%							
Bedlinoe					1.99%			0.47%				
Gelliqaer												
<b>Zone 4</b>												
Lidl, Pengam Road, Ystrad Mynach, CF82 8AA				12.20%	5.29%	9.98%	10.80%	2.12%			1.51%	
Sainsbury's Superstore, Newbridge Road, Pontin/Frith, NP12 2AN				22.44%	13.28%	19.32%	15.57%	5.54%		5.54%		
Tesco Superstore, New Road, Ystrad Mynach, CF82 7DP	0.70%			1.65%			4.13%		4.43%		0.64%	
Newbridge village centre												
Ystrad Mynach town centre						0.25%						
Abercarn							0.47%					
Cwmern							0.47%					
Cwmbridach							0.47%					
Maesvomer							0.47%		0.30%		1.98%	
One Stop, Penllyn, NP12 2NP							4.69%				0.62%	
Pontin/Frith												
<b>Zone 5</b>												
ASD, Blackwood Gate Retail Park, Blackwood, NP12 2P5				5.54%	5.49%	9.21%	1.18%	13.91%	5.42%	2.46%		
ASD, Blackwood Retail Park, Cliff Road, Blackwood, NP12 0NT		3.29%		8.80%	12.85%	4.86%	29.84%	7.45%	5.70%			
B&M Bargains, Cliff Road, Blackwood, NP12 0NT					0.90%	1.88%	0.20%	3.55%				
Co-op, Central Buildings, Galsdale, NP12 0JU						0.97%	0.47%	0.20%	1.74%			
Farmfoods, Blackwood Retail Park, Blackwood, NP12 0NT						0.77%	0.71%	0.71%	0.42%		0.32%	
Home Bargains, Blackwood Gate Retail Park, NP12 2P5						2.03%	1.88%	2.83%	3.83%	3.23%		
Island, Hanbury Road, Barsoed, CF81 8GT						2.48%	0.95%	2.86%	9.21%			
Island, Idony Centre, Blackwood, NP12 1AU			0.24%	0.46%	4.66%	3.13%	1.75%	16.42%	10.49%	13.26%	16.99%	
Morrison's, Barsoed Gateway, Barsoed, CF81 8NX							4.78%	0.84%	12.83%			
Tesco Express, Highfield Way, Blackwood, NP12 1SL												
Barsoed town centre								0.47%				1.15%
Blackwood town centre						0.99%						3.19%
Newbridge town centre												
Abertridwr												
Capri Forest												
Croespenmaen												
Crumlin												
Gilfach												
Markham												
One Stop, Markham, NP12 0PR							0.70%		1.98%			
Pengam						0.48%	0.47%					
Penllyn-mawr									0.42%			
<b>Zone 6</b>												
Farmfoods, Gwent Shopping Centre, Tredegar, NP22 3HJ											0.64%	1.55%
Home Bargains, Tredegar, NP22 3EJ											0.32%	
Lidl, Gelli Road, Tredegar, NP22 3RD											6.02%	10.37%
Rhymney town centre												0.42%
Tredegar town centre												1.92%
Christies, Pontotyn												0.77%
New Tredegar												8.76%
Pontotyn												2.69%
<b>Beyond Study Area</b>												
ASD, Caerphilly Road, Cardiff, CF14 4QF	1.00%		0.97%									
ASD, City Link Retail Park, Cardiff, CF24 1PQ					0.32%							
ASD, Culverhouse Cross, Cardiff, CF5 5DW	1.04%											
ASD, Glamorgan Vale Retail Park, Pontyfun, CF72 8BP												
ASD, Penybryn Street, Merthyr Tydfil, CF47 5TP					1.93%					1.74%	1.11%	3.64%
ASD, The Vale, Ebbw Vale, NP23 6AT					4.27%	3.30%					0.32%	0.77%
ASD, Downas Top, Merthyr Tydfil, CF48 2YF											30.10%	15.31%
ASD, Llanedeyrn Retail Park, Ebbw Vale, NP23 4EL											1.32%	3.19%
ASD, Llewellyn Road, Torfaen, Cwmbran, NP44 1UL								1.80%				
ASD, Longwood Drive, Cardiff, CF14 7EW	0.50%			1.34%			0.25%					
ASD, Lower Ditch Street, Newport, NP23 2BH												
ASD, Pencarn Way, Duffryn, Newport, NP10 8SL			1.41%					0.84%			0.32%	
Co-op, Brown Street, Merthyr Tydfil, CF48 4BS								0.84%	1.74%			
Co-op, Windsor Road, Pontonville, NP11 6NP												
Island, St Ydelli Square Shopping Centre, Merthyr Tydfil, CF47 8EG												0.32%
Lidl, Gaudy Road, Aberdare, CF48 8AD				1.53%								1.27%
Lidl, Maindy Road, Cardiff, CF24 4HQ			0.97%									
Lidl, Penparc Industrial Estate, Merthyr Tydfil, CF48 2TA					0.48%		0.86%				7.36%	5.36%
M&S Foodhall, Culverhouse Cross, Cardiff, CF5 6VZ	1.04%				0.32%	1.33%	0.86%				0.32%	
M&S Foodhall, Cyfartha Retail Park, Merthyr Tydfil, CF48 1HY			1.11%									
M&S Simply Food, Ty Glas Road, Cardiff, CF14 5YP	0.63%		4.25%	2.26%			1.71%		0.30%			
Morrison's, Aalea Road, Rosestone, NP10 9HZ									0.20%			7.62%
Morrison's, Beaufort Road, Ebbw Vale, NP23 5W5	0.25%											3.64%
Morrison's, Castle Court, Caerphilly, CF83 1PF	18.40%	17.63%	13.03%	10.31%	0.32%	0.99%	0.36%					
Morrison's, Grange Road, Cwmbran, NP44 1QP									0.30%			
Morrison's, Newport Road, Cardiff, CF23 9JF				0.24%								
Morrison's, Old Drive, Newport, NP11 0BB									0.30%			0.32%
Morrison's, Park Road, Aberavenny, NP7 5TP												
Morrison's, Pentywedy Road, Porth, CF39 9BA												
Morrison's, Ty Glas Road, Cardiff, CF14 5YP	0.25%		1.11%									
Sainsbury's Local, 123-127 Woodville Road, Cardiff, CF24 4DZ			0.24%									
Sainsbury's Local, Heol Llanishan Fach, Cardiff, CF14 6RD	0.63%			1.88%								
Sainsbury's Local, Unit 35, Sovereign Arcade, Newport, NP20 1ED				1.80%								
Sainsbury's Superstore, Albany Street, Newport, NP20 5N			0.24%									
Sainsbury's Superstore, Calchester Avenue, Pen-y-vaen, Cardiff, CF23 9XN								0.51%				
Sainsbury's Superstore, Excalibur Drive, Cardiff, CF14 9BB	0.63%		0.70%									
Sainsbury's Superstore, Llewellyn Road, Cwmbran, NP44 1UL	0.25%		2.05%		4.91%	0.67%	0.73%		0.81%			
Sainsbury's Superstore, Penparc Retail Park, Pontonville, CF37 4DA	0.25%											1.67%
Tesco Extra, Culverhouse Cross, Cardiff, CF5 6DQ												
Tesco Extra, Excalibur Road, Cardiff, CF14 3AT												
Tesco Extra, Harleth Retail Park, Newport, NP20 3BA												

Lidl Great Britain Ltd  
 Stapeacoch Depot, Pontllanfrith, Blackwood.

Table 5: Convenience Turnover of Existing Facilities, 2025 (£m)

Destination	Zone 1			Zone 2			Zone 3			Zone 4			Zone 5			Zone 6			Total
	Main	Top Up	Sub Total	Main	Top Up	Sub Total	Main	Top Up	Sub Total	Main	Top Up	Sub Total	Main	Top Up	Sub Total	Main	Top Up	Sub Total	
<b>Zone 1</b>																			
Aldi, Gallagher Retail Park, Caerphilly, CF83 3GX	9.5	2.3	11.9	3.0	0.4	3.5	0.3		0.3					0.2		0.2			15.8
Aldi, Midway Retail Park, Upper Boat, Pontrypidd, CF37 5BL	1.0		1.0	0.5		0.5	0.2		0.2	0.7	0.3	1.0	0.7		0.7	0.2		0.2	3.1
B&M Bargains, Bedwas Road, Caerphilly, CF83 3AX																			0.5
Heron Frozen Foods, Castle Court Shopping Centre, Caerphilly, CF83 1NU	1.0		1.0	0.3		0.3	0.3		0.3				0.1	0.1					1.3
Home Bargains, Portywindy Road, Caerphilly, CF83 3HF				0.3		0.3													0.3
Island Food Warehouse, Midway Retail Park, CF37 5BL	3.2	0.4	3.6	1.1		1.1													4.7
Island, Cardiff Road, Caerphilly, CF83 1JN	1.4	3.1	4.5																4.7
Lidl, Beddau Way, off Nantgarw Road, Caerphilly, CF83 2AX	13.4	3.1	16.5	1.3	0.7	2.0				0.1		0.1				0.2		0.2	18.9
TESCO Express, Brynffynon Road, Caerphilly, CF83 2RD	3.5	1.1	4.6				0.1		0.1										4.7
TESCO Express, Castle View, Caerphilly, CF83 1SN	1.7	0.2	1.9				0.3	0.3	0.6										4.8
TESCO Extra, Gelli Hirion Industrial Estate, Pontrypidd, CF37 5SN	1.7	0.2	1.9				0.5	0.1	0.6							0.7		0.7	3.1
TESCO Superstore, Gallagher Retail Park, Caerphilly, CF83 3NL	6.5	1.1	7.6	4.5	0.9	5.3	0.6		0.6	0.1	0.1	0.1				0.3		0.3	13.6
Caerphilly town centre	1.2	1.2	2.4	0.6	0.4	1.0				0.1	0.1	0.2							2.5
Taff's Wells village centre	0.2		0.2																0.2
Abertidwr	0.9	0.9	1.8																0.9
Llanbradach	0.2	0.2	0.4																0.2
<b>Zone 2</b>																			
Aldi, Interchange, Risca, NP11 6NP				8.1	0.8	8.9				1.2	0.1	1.2	0.4		0.4				10.5
Asda, Portywindy Road, Caerphilly, CF83 85X	30.4	2.7	33.1	5.8	0.3	6.1	0.3		0.3	0.3	1.2	1.5	1.2	1.5	2.7	1.5	0.2	1.7	42.1
Co-op, Church Street, Caerphilly, CF83 8ED		0.8	0.8	0.3	0.3	0.6													1.1
Co-op, Commercial Road, Machen, Caerphilly, CF83 8PG				0.1	0.7	0.8													0.9
Lidl, Commercial Street, Risca, NP11 6AW				4.1	1.7	5.7				1.9	0.4	2.3	0.7	0.1	0.8				8.8
TESCO Express, Overbank Newport Road, Caerphilly, CF83 8BY				0.1	0.4	0.5													0.5
TESCO Extra, Pontymister Industrial Estate, Pontymister, NP11 6NP				13.2	1.8	15.0				2.7	0.8	3.5	2.1	0.4	2.5				21.0
Bedwas town centre				0.1	0.1	0.2													0.1
Crosskeys village centre				0.6	0.6	1.2													0.6
Risca/Pontymister town centre				1.4	1.4	2.8				0.6		0.6	0.4	0.4	0.8				2.4
<b>Zone 3</b>																			
Aldi, New Road, Tynyberth, CF82 8AU				0.1	0.1	0.2	0.3	4.5	4.8	3.0	0.1	3.1	3.1	0.4	3.5	1.3	0.1	1.4	12.5
Co-op, Commercial Street, Nelson, CF46 6NF				0.9	1.9	2.8													2.8
Co-op, Fox Street, Trehamis, CF46 5HE				0.9	1.0	1.9													1.9
Congli, Malin Road, Nelson, CF46 6PE				1.3	0.9	2.2					0.1	0.1		0.4	0.4		0.1	0.1	2.7
Nelson village centre																			0.1
Treharris town centre					0.6	0.6	0.6		0.6										0.6
Beddington							0.6	1.1	1.7										1.7
Gelligaer							0.2	0.2	0.4	0.1	0.1	0.2							0.3
<b>Zone 4</b>																			
Lidl, Fensam Road, Ystrad Mynach, CF82 8AA							5.0	0.5	5.5	5.7	1.5	7.2	1.9		1.9	0.6		0.6	15.3
Sainsbury's Superstore, Newbridge Road, Pontllanfrith, NP12 2AN							8.0	2.2	10.2	8.5	1.2	9.7							19.9
TESCO Superstore, New Road, Ystrad Mynach, CF82 7DP	0.7		0.7				9.3	1.4	10.7	11.0	2.3	13.3	3.9		3.9	0.2		0.2	28.9
Hengoed village centre							0.2	0.2	0.4				0.4	0.4	0.8				0.8
Ystrad Mynach town centre										0.6	0.6	1.2							1.2
Abertarn										0.1	0.1	0.2							0.1
Cwmcam										0.1	0.1	0.2							0.1
Cwmfelinfach										0.1	0.1	0.2							0.1
Maesycwmer										0.1	0.1	0.2	0.4	0.4	0.8				0.5
One Stop, Penllwyn, NP12 2NP										0.1	0.1	0.2	0.3	0.1	0.4				0.5
Pontllanfrith										0.9	0.9	1.8							0.9
<b>Zone 5</b>																			
Aldi, Blackwood Gate Retail Park, Blackwood, NP12 2FS							2.3	0.6	2.9	5.3	0.2	5.4	12.3	1.2	13.5	0.9		0.9	22.7
Asda, Blackwood Retail Park, Cliff Road, Blackwood, NP12 0NT	0.8	0.8	1.6				3.6	7.3	10.9	0.7	8.0	26.4	1.7	28.1	29.8	2.2		2.2	42.7
B&M Bargains, Cliff Road, Blackwood, NP12 0NT							0.2	0.2	0.4	0.2	0.2	0.4	0.1	0.3	0.4				0.5
Co-op, Central Buildings, Oakdale, NP12 0UJ										0.2	0.3	0.5							1.1
Farmfoods, Blackwood Retail Park, Blackwood, NP12 0NT							0.6	0.1	0.7	0.6	0.2	0.8	0.4	0.6	1.0				1.2
Home Bargains, Blackwood Gate Retail Park, NP12 2FS										0.5	0.5	1.0	0.6	0.1	0.7				1.3
Island, Harbury Road, Baropod, CF81 8QJ										1.2	0.3	1.4	2.5	0.8	3.4	1.2		1.2	6.0
Island, Islwyn Centre, Blackwood, NP12 1JU				0.1	0.1	0.2				1.4	0.1	1.6	2.5	2.0	4.6				6.2
Morrisons, Baropod Gateway, Baropod, CF81 8NX				0.1	0.1	0.2	1.9	0.3	2.2	1.0	0.3	1.3	12.8	2.3	15.1	5.1	1.6	6.7	25.5
TESCO Express, Highfield Way, Blackwood, NP12 1SL										0.7	0.7	1.4	2.8	3.6	6.4				4.1
Baropod town centre																			0.1
Blackwood town centre										0.1	0.1	0.2				0.6	0.6	1.2	0.7
Newbridge town centre													0.9	0.9	1.8				0.9
Abertarn					0.1	0.1							0.4	0.4	0.8	0.3	0.3	0.6	0.8
Cefn Forest													0.5	0.5	1.0				0.5
Croespenmaen													0.2	0.2	0.4				0.2
Crumlin													0.6	0.6	1.2				0.6
Gilfach													0.5	0.5	1.0				0.5
Markham													0.5	0.5	1.0				0.5
One Stop, Markham, NP12 0PR										0.1	0.1	0.2	0.4	0.4	0.8				0.5
Pengam							0.2	0.2	0.4	0.1	0.1	0.2							0.3
Penryn-mawr																			0.1
<b>Zone 6</b>																			
Farmfoods, Gwent Shopping Centre, Tredegar, NP22 3EJ																0.2	0.1	0.4	0.4
Home Bargains, Tredegar, NP22 3EJ																0.1	0.1	0.1	0.1
Lidl, Gelli Road, Tredegar, NP22 3RD																2.3	1.0	3.3	3.3
Rhymer town centre																			1.0
Tredegar town centre																			0.2
Christies, Pontlotyn																0.1	0.1	0.1	0.1
New Tredegar																			0.8
Pontlotyn																0.3	0.3	0.3	0.3
<b>Beyond Study Area</b>																			
Aldi, Batchelor Road, Cardiff, CF14 3AX																			1.5
Aldi, Caerphilly Road, Cardiff, CF14 4QF	1.0		1.0	0.6		0.6	0.1		0.1										1.1
Aldi, Culverhouse Cross, Cardiff, CF5 6AW	1.0		1.0				0.8		0.8				0.4	0.4	0.8	0.4	0.3	0.8	2.0
Aldi, Plymouth Street, Merthyr Tydfil, CF47 6TP																0.1	0.1	0.2	0.2
Aldi, The Walk, Ebbw Vale, NP23 6AY																			0.2
Asda, Dowlas Top, Merthyr Tydfil, CF48 2YF							1.8	0.3	2.1							11.6	1.5	13.0	15.1
Asda, Lakeside Retail Park, Ebbw Vale, NP23 4SL													0.4	0.4	0.8	0.5	0.3	0.8	1.1
Asda, Llewellyn Road, Torfaen, Cwmbran, NP44 1UL													1.6	1.6	3.2				0.8
Asda, Lonowod Drive, Cardiff, CF14 7JW	0.5		0.5				0.6	0.6	1.2										1.0

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Table 6: Retail Turnover of Proposed Development

	Gross Internal Area (sqm)	Total Net Sales (sqm)	Trading density (£/sqm)	Turnover 2025 (£m)	Turnover 2030 (£m)	Turnover 2030 inc. Inflow (£m)
	[1]	[2]	[4]	[5]	[6]	[6]
Proposed Lidl Foodstore convenience sales area	1,949	1,334	10,201	10.9	11.0	11.2
comparison sales area		267	2,376	0.6	0.6	0.7
<b>Total</b>					<b>11.6</b>	<b>11.9</b>

Notes

[2] Net sales area taken from application drawings

[3] assumed 100% net f/s uplift conv sales

[4] s/d taken from Global Data (2023) indexed to 2022 price base

[5] = [3]\*[4]/1,000,000

[6] turnover rolled forward to 2030 based on assumed f/s efficiency increase (0.2% conv) (EXRPBN 21 Fig 4a (Feb 2024))

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Table 7 Capacity for additional convenience floorspace to 2030

	2025	2030
[1] Available Convenience Expenditure in Zone 5 - Blackwood (£m)	110.8	111.0
[2] Zone 5 derived turnover of existing stores in Zone 5 - Blackwood (£m)	75.3	75.9
[3] Turnover of proposed development (£m)	0.0	11.0
[4] Turnover of Convenience Retail Commitments in Zone 5 - Blackwood (£m)	0.0	0.0
[5] Total Zone 5 turnover (£m)	75.3	86.9
[6a] Zone 5 (Blackwood) convenience expenditure capacity (£m)	35.5	24.1
[6b] Retained market share of Zone 5 (Blackwood) expenditure (%)	68.0	78.3

**Notes**

[1] taken from table 4

[2] derived from table 8. Projected forward to 2024/9 on basis that facilities gain from a pro-rata growth in expenditure as set out at Table 4

[3] taken from table 9

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

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

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

2022 prices

Table 8: Convenience trading effects of the proposed development, 2030

	Convenience Turnover 2025		Conv Turnover inc. inflow 2025	Convenience Turnover 2030		Conv Turnover inc. inflow 2030	Convenience Trade Draw to Proposed Development		Residual Turnover 2030	Impact			
	£m	%		£m	%		%	£m		Change 2025-30		2030 Impact	
	[1]	[2]	[3]	[4]	[5]	[6]	[7]		[8]	£m	%	£m	%
<b>Blackwood Principal Town Centre</b>													
Asda, Blackwood Retail Park, Cliff Road, Blackwood, NP12 0NT	42.7	2	43.6	43.1	2	43.9	17	1.91	42.0	-1.6	-3.6	-1.9	-4.3
Iceland, Islwyn Centre, Blackwood, NP12 1AU	6.2	2	6.3	6.2	2	6.4	2	0.22	6.1	-0.17	-2.8	-0.2	-3.5
Farmfoods, Blackwood Retail Park, Blackwood, NP12 0NT	1.2	2	1.2	1.2	2	1.2	0.5	0.06	1.2	-0.05	-3.8	-0.1	-4.6
B&M Bargains, Cliff Road, Blackwood, NP12 0NT	0.5	2	0.5	0.5	2	0.5			0.5	0.004	0.8		
Blackwood town centre	0.7	2	0.7	0.7	2	0.7			0.7	0.01	0.8		
<b>Blackwood Centre total</b>	<b>51.3</b>	<b>2</b>	<b>52.3</b>	<b>51.7</b>	<b>2</b>	<b>52.74</b>	<b>19.5</b>	<b>2.19</b>	<b>50.6</b>	<b>-1.8</b>	<b>-3.4</b>	<b>-2.2</b>	<b>-4.1</b>
<b>Blackwood Gate Retail Park</b>													
Aldi, Blackwood Gate Retail Park, Blackwood, NP12 2FS	22.7	2	23.2	22.9	2	23.4	34	3.81	19.6	-3.6	-15.6	-3.8	-16.3
Home Bargains, Blackwood Gate Retail Park, NP12 2FS	1.3	2	1.3	1.3	2	1.3			1.3	0.01	0.8		
<b>Bargoed Principal Town Centre</b>													
Bargoed town centre	0.1	2	0.1	0.1	2	0.1			0.1	0.001	0.8		
Iceland, Hanbury Road, Bargoed, CF81 8QT	6.0	2	6.1	6.1	2	6.2			6.2	0.05	0.8		
Morrisons, Bargoed Gateway, Bargoed, CF81 8NX	25.5	2	26.0	25.7	2	26.2	12	1.35	24.9	-1.1	-4.4	-1.3	-5.1
<b>Bargoed Centre Total</b>	<b>31.6</b>	<b>2</b>	<b>32.3</b>	<b>31.9</b>	<b>2</b>	<b>32.5</b>	<b>12</b>	<b>1.35</b>	<b>31.2</b>	<b>-1.1</b>	<b>-3.4</b>	<b>-1.3</b>	<b>-4.1</b>
<b>Ystrad Mynach Principal Town Centre</b>													
Tesco Superstore, New Road, Ystrad Mynach, CF82 7DP	28.9	2	29.4	29.1	2	29.7	5	0.56	29.1	-0.3	-1.1	-0.6	-1.9
Lidl, Pengam Road, Ystrad Mynach, CF82 8AA	15.3	2	15.6	15.4	2	15.7	5	0.56	15.1	-0.4	-2.8	-0.6	-3.6
Ystrad Mynach town centre	0.6	2	0.6	0.6	2	0.6			0.6	0.005	0.8		
<b>Out of Centre</b>													
Sainsbury's Superstore, Newbridge Road, Pontllanfraith	19.9	2	20.3	20.0	2	20.4	22.5	2.52	17.9	-2.4	-11.7	-2.5	-12.3
Tesco Express, Highfield Way, Blackwood, NP12 1SL	4.3	2	4.4	4.3	2	4.4			4.4	0.03	0.8		
Co-op, Central Buildings, Oakdale, NP12 0JU	1.1	2	1.1	1.1	2	1.1			1.1	0.01	0.8		
One Stop, Markham, NP12 0PR	0.5	2	0.6	0.5	2	0.6			0.6	0.004	0.8		
One Stop, Penllwyn, NP12 2NP	0.5	2	0.5	0.5	2	0.5			0.5	0.004	0.8		
Inflow							2	0.22					
							100	11.2					

Notes

- [1] taken from table 5
- [2] CS allowance for non-resident spend
- [3] =[1]\*[2]
- [4] Allowance made for turnover of existing facilities to gain from pro-rata growth in expenditure to 2030 in line with Table 3a
- [5] CS allowance for non-resident spend
- [6]=[4]+[5]
- [7] CS estimate reflective of existing stores trading position
- [8] =[6]-[7]
- [9]=[8]-[3]
- [10]=[8]-[3]/[3]\*100
- [11]=[8]-[6]
- [12]=[8]-[6]/[6]\*100

2022 prices