

Lidl Great Britain Ltd

Planning & Retail Statement

Land at A482, Cwmann, Lampeter

PAC DRAFT

October 2024



Document control

Prepared by	Rhianon Jones
Checked by	Rob Mitchell

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1.0 Introduction

1.1.1 This Planning and Retail Statement (PRS) has been prepared by CarneySweeney (CS) on behalf of the applicant, Lidl Great Britain Ltd, in support of a full planning application for the erection of a Class A1 retail foodstore with surface level car parking, landscaping, all associated development at land at A482, Cwmann, Lampeter.

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

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

- Application Forms and Certificates
- Planning Drawings (prepared by HTC):
 - Site Location Plan - Drawing no. P401 B
 - Existing Site Plan - Drawing no. P400 A
 - Existing Utilities - Drawing no. P407
 - Proposed GA Site Plan - Drawing no. P411 C
 - Proposed Setting Out Site Plan - Drawing no. P412 D
 - Proposed Surfacing Plan - Drawing no. P413 B
 - Proposed Boundary Treatment Plan - Drawing no. P414 B
 - Design Risk Assessment - Drawing no. P415 B
 - Proposed Site Plan with Utility - Drawing no. P416 B
 - Proposed Levels Strategy - Drawing no. P417 C
 - Proposed GA Floor Plan - Drawing no. P110 A
 - Proposed Floor Plan Areas - Drawing no. P111 A
 - Proposed Roof Plan - Drawing no. P112 A
 - Proposed GA Elevations - Drawing no. P210 D
 - Visual Right Isometric View - Drawing no. CGI01 A
 - Visual Site Plan – Drawing no. CGI03



- Visual A482 Perspective - Drawing no.CGI06 A
- Visual A482 A485 Front Elevation - Drawing no. CGI08
- Visual A482 A485 Front Elevation Perspective - Drawing no. CGI09
- Visual Perspective Corner View - Drawing no. CGI10
- Visual Rear Elevation - Drawing no. CGI11
- Landscape Drawings (prepared by Corscadden Associates):
 - Landscape Existing Features - Drawing no. CA 2024-LMP-02 A
 - Landscape Existing Features and Overlay - Drawing no. CA 2024-LMP- 03 A
 - Landscape Proposals Overall - Drawing no. CA 2024-LMP- 04 A
 - Landscape Trees, Hedges and Grass - Drawing no. CA 2024-LMP- 05 A
 - Landscape Native Blocks and Planting Beds - Drawing no. CA 2024-LMP- 06 A
 - Landscape General Sections - Drawing no. CA 2024-LMP- 07 A
 - Landscape Rear Wall Plan - Drawing no. CA 2024-LMP- 08 A
 - Planting Schedule – dated 14 October 2024
- Proposed Lighting Layout (Signify) – Drawing no. D-591649 Rev 0
- Design and Access Statement Rev B (HTC Architects)
- Preliminary Ecological Appraisal (Biodiverse Consulting)
- Tree Survey, Tree Constraints Plan and Arboricultural Impact Assessment (ArbsTS)
- Green Infrastructure Statement (Corscadden Associates)
- Landscape Visual Impact Assessment (Corscadden Associates)
- Landscape and Ecological Design Scheme (Corscadden Associates)
- Noise Assessment (Inacoustic)
- Flood Consequences Assessment (Lucion Delta Simons)
- Neutrality Nutrients (Lucion Delta Simons)
- Drainage Strategy (Lucion Delta Simons)
- Phase 2 Ground Investigation (Ref. 1302.02.01) (Remada)
- Transport Statement and Travel Plan (SCP)
- Pre-application Consultation Report (to be prepared and provided following PAC)

1.1.4 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 the key planning considerations; and
- Section 10 presents the overall conclusions.

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2.0 The Proposed Development

2.1 The Application Site and surroundings

2.1.1 The application site is on land at Bridge House Farm, Llanmaes Road, Llanmaes. The site extends to approximately 1.07ha. It is located at the junction of the B4265 as shown on the Site Location Plan accompanying the application. The topography of the site slopes from south to north. The site is currently in agricultural use bordered by a mix of trees and hedgerows.

2.1.2 The application site is located adjacent to the settlement of Cwmann and to the south of Lampeter, at the junction of the A485 and the A482 as shown on Figure 2.1 below.



Figure 2.1: Extract of Site Location Plan (outlined in red)

2.1.3 The site extends to approximately 1.46ha and comprises an area of level tarmac surface, in the form of hardstanding, and agricultural fields associated with the former use of the site, Pen-y-bont Farm. Existing access to the site is gained from the A485.

2.1.4 The site is used informally for parking, to access a hot food takeaway van (known as Burger Box) that currently resides on the site. The site is partly brownfield, previously developed land



and lies directly adjacent to the settlement boundary. The site lies beyond 300m from the nearest retail centre and is therefore an out of centre location in retail policy terms.

- 2.1.5 The River Teifi is located approximately 27m to the east of the site off the A482. The site is located within Zone C2 flood plain as identified by the Natural Resources Wales's (NRW) Development Advice Maps (DAM) maps. Within the NRW Flood Map for Planning maps, the site is identified as partially located within Flood Zone 2 and partially within Flood Zone 3 (Note, retail is a 'less vulnerable' use permissible in Flood Zones 2 & 3 in appropriate circumstances).
- 2.1.6 The site does not lie within the River Teifi Special Area of Conservation (SAC) but does lie within the catchment of the SAC. The site lies within the Teifi Valley Special Landscape Area (LDP Policy SP14 and EQ6). The site is located within a Slate Safeguarding Area and a Sand and Gravel Safeguarding Area (LDP Policy MPP3).
- 2.1.7 The site is not 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 (AQMA). The site is not affected by any public rights of way (PRoW). There are no other statutory or non-statutory designations of relevance to the site.

2.2 Active Travel and Site Accessibility

- 2.2.1 The surrounding area benefits from a good level of pedestrian infrastructure. A footway is present on both sides of the A482 running north from the site into Lampeter. Dropped kerbs and tactile paving are also provided at the majority of junctions when travelling towards Lampeter. Additionally, there is a footway on one side of the carriageway going south into Cwmann. The residential areas of Lampeter and Ram are within a 1-mile walking catchment area. This demonstrates that employees from the local area will be able to easily access the site by foot. This also indicates that a proportion of potential customers will be within reasonable walking distance of the application site. A number of local amenities are also within a 1-mile walk of the site (up to 20 minutes' walk) which will promote linked trips.
- 2.2.2 The areas of Lampeter, Cwmann, Llanfaie Clydogau, Llanwnnen and Pencarreg are within a 5-mile cycle distance from the site. The existing local cycle infrastructure combined with the cycle parking provision and topography of the area will ensure that employees and customers will easily be able to access the proposed development by bike.
- 2.2.3 The application site is accessible by public transport; the nearest bus stops to the site are located just 50m to the north of the site along the A482 which provides bus services to Aberystwyth and Llanybydder (585, BB6 and BB7) and 70m to the south along the A485 which provides the main Carmarthen to Lampeter bus services (T1 and T1A).
- 2.2.4 Lampeter is also located approximately a 15-minute walk from Cwmann, where public transport is available throughout the village, with bus services connecting to surrounding settlements;



Rhydcymerau and Tregaron. A wide footway is located along the frontage of the site, which provides a continuous route to both Cwmann and Lampeter.

- 2.2.5 In summary, it is considered that the site has acceptable levels of accessibility by most of the main non-car modes of transport. Access to the site by foot and cycle is of a good standard, and bus connections are also available within close proximity, thereby enabling access to the site from a range of local destinations.

2.3 Surrounding Context

- 2.3.1 Cwmann is identified as a 'Sustainable Community' (Tier 4 Settlement) within the settlement hierarchy of adopted LDP (LDP Policy SP3 / SC23) and as a 'Sustainable Village' (Tier 3 Settlement) within the settlement hierarchy of the emerging LDP (Emerging LDP Policy SP3).
- 2.3.2 Cwmann is served by a range of facilities including pubs, places of worship, and a Primary School, which are located within a walking distance of the site. Existing retail provision is limited to two specialised outlets.
- 2.3.3 Small scale growth of Cwmann is expected over the next few years due to residential commitments within the area. This includes construction currently underway for 20no. affordable units and conversion of former Coedmor School to a residential dwelling following the grant of planning permission in January 2024. In addition, the emerging LDP allocates a further two sites in Cwmann for residential development: Land south of Cae Coedmor which is identified for 20no. dwellings and Land adjacent to Lleinau which is identified for 10no. dwellings.
- 2.3.4 Cwmann is a small settlement within 300m of Lampeter town, and 650m to the south of Lampeter Town Centre boundary. Lampeter is a historic market and university town within the administrative boundary of Ceredigion County Council. Lampeter is categorised as an Urban Service Centre within the Ceredigion Local Development Plan (adopted April 2013). The Ceredigion LDP describes Lampeter as an important town for retailing, administration, judicial, education and business services. The town serves a large part of Ceredigion but also parts of Carmarthenshire. This wider role is recognised by the Wales Spatial Plan which has identified Lampeter as a Key Settlement within the Teifi Valley Hub.



2.4 Planning History

2.4.1 The planning history for the site is set out in Table 2.1 below. The planning history confirms that the principle of redevelopment for retail-led use(s) is established at the site.

Table 2.1: Planning History

Application Ref	Details of Proposal	Decision
W/01002	Service Station including forecourt sales building, petrol pumps and canopy, car wash bay and jet wash bay	Approved 24 October 1997
TMT/02448	Service Station including forecourt sales building, petrol pumps and canopy car wash & jet wash bay, renewal of W/01002.	Approved 21 November 2002
W/07358	Erection of 23 new houses of 3 & 4 bedrooms including 7 "starter" low price homes.	Approved 23 June 2004
W/31378	Proposed siting of a Neighbourhood Retail Convenience Store (Amendment to Planning Permission TMT/02448) W/31378 permits up to 250 sqm of retail floorspace (A1) use on the site.	Approved 30 June 2022
PL/05898	Redevelopment of the site to provide trade counter units for use A1, B1, B2, B8 and associated works. The planning permission relates to the erection of 5 no. units providing a combined GIA floorspace of 676sqm. The permission does not restrict the level of retail use on the site	Approved 4 September 2023

Extant Planning Permission and Fallback Position

2.4.2 Planning permission was granted in November 2002 for the erection of a service station including forecourt sales building, petrol pumps & canopy car wash bay & jet wash bay. This was a renewal of permission ref. W/01002.

2.4.3 Works have been undertaken on the site to ensure that the permission has been implemented and remains extant. These works involve the establishment of a new vehicular access and the creation of hardstand areas and footings in anticipation for the erection of buildings/structures on the site. The land forming the subject of this permission remains undeveloped and under-utilised. It has been vacant for an extended period of time.

2.4.4 Full planning permission was granted in September 2023 for the redevelopment of the part of the site for trade counter units for uses A1, B1, B2, B8 and associated works. The planning permission relates to the erection of 5 no. units providing a combined GIA floorspace of 676 sq



m. The permission does not restrict the level of retail use on the site. The ability to build retail development on the site without any further permission represents a strong fall-back position.

2.4.5 In the context of the 2023 permission, the application involved significant flood risk assessment, and dialogue with NRW, due to the site location within the C2 flood zone. The proposal included raising the levels of the development footprint to ensure the site remains flood free in all considered events. The application was supported by a Flood Consequences Report which assessed the existing and proposed flooding scenarios. The scheme was ultimately deemed to be acceptable on all grounds, including flood risk, and approved accordingly by the LPA. Whilst the redline boundary of the 2023 permission relates to just part of the application site, this provides a partial baseline against which the proposed development must be considered and assessed.

2.5 The Proposed Development

2.5.1 The Application Proposals

2.5.2 The proposed development seeks planning permission for the following:

“Erection of a Class A1 retail foodstore with surface level car parking, landscaping, and all associated development”.

2.5.3 The proposals are shown on the Proposed Site Layout Plan (Drawing no. P411 C) enclosed at **Appendix A** and comprise:

- The erection of a Class A1 food store of total floorspace of 1,962 sqm (GIA) (c.1,334 sqm net sales);
- 120 car parking spaces including 9 parent and child, 6 disabled and 2 Electric Vehicle charging bays;
- Cycle spaces will also be provided; and
- Associated drainage and landscaping.

Siting and Appearance

2.5.4 The applicant has considered a range of development options to best respond to the constraints and opportunities of the site. The proposed layout responds as positively as possible to the location of the foodstore within the flood zone. The orientation of the proposed retail unit allows for maximum views across the site utilising a glazed shop front, whilst managing to minimise



the impact on the local surrounding area. The proposed delivery area is located at the side of the store to allow safe manoeuvre of the HGV.

- 2.5.5 The proposed materials respond to the local character by using a simple palette of traditional and modern materials similar to those in the surrounding area.

Access and Parking

- 2.5.6 Vehicle access and egress will be taken form the creation of a new access road from the A482.
- 2.5.7 Pedestrian routes will be formed from both the A482 and A485 into the site, these will have crossing points and zebra crossing markings to increase the overall safety for customers moving throughout the site.
- 2.5.8 The proposal provides 120 car park spaces, including 9 parent and child, 6 disabled and 2 electric vehicle spaces. Proposed disabled spaces and parent and child spaces will be located close to the entrance of the new build store. Cycle parking will be provided close to the store entrance to provide convenience for customers travelling by bicycle.

Deliveries and Servicing

- 2.5.9 The store will be serviced via a loading bay on its western elevation 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 is typically 1 per day (2 at peak periods). 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.
- 2.5.10 A swept path analysis has been undertaken to ensure that service vehicles can safely access the service facilities without conflict with cars parked at the store.

Boundary Treatment and Landscaping

- 2.5.11 Careful consideration has been given to the boundary treatment and landscaping taking account of the surroundings.
- 2.5.12 The proposals include a new landscaping scheme incorporating soft landscaping along the two streets surrounding the site. The landscaped boundaries will act as a visual barrier along the



roads and present some screening opportunities, providing a visually appealing scheme for both residents and retail users.

- 2.5.13 Whilst the proposals increase the area of hard standing, the additional landscaping ensures that there will be an increase biodiversity of all other habitat areas and the proposals will provide a significant biodiversity net gain.

2.6 Lidl Operational Model

2.6.1 Lidl is now exceptionally well established in the UK with the Company operating in excess of 950 stores from sites and premises both within and outside town centres. Its market share continues to increase substantially, and the Company is expanding its store network considerably. The UK operational model is based firmly on the success of Lidl's operations abroad with more than 10,800 stores trading across Europe.

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

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

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

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



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

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

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

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

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

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

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

2.6.10 Since 2016, Lidl has reduced its food waste by almost half (43%). This means it is well on track to hit its 50% reduction target by 2030. Providing more meals to charities - including over 6 million in 2022 which surpasses the discounter's target - has helped reach this milestone. In 2022, Lidl also prevented nearly 9,000 tonnes of food waste through the sale of 1.7 million 'Too



Good to Waste' boxes. Reducing other forms of waste has also been a key priority and 95% of Lidl's own-brand packaging is now recyclable, reusable, renewable or refillable.

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

2.7 Pre-application Consultation and Engagement

- 2.7.1 The application submission follows discussions with Carmarthenshire County Council Officers, initiated in July 2024 whereby the draft proposals were submitted to the LPA for comment. A meeting was held with planning officer Helen Rice on 24 September 2024 and a formal pre-



application consultation response was received on 27 September 2024. The feedback from the LPA included the following points:

- Recognition that the application site lies adjacent to but outside the settlement limits of Cwmann as defined in the current LDP and as such is classed as countryside.
- Recognition that the Council's Retail Study (2023) identifies a deficiency in food store provision within the northern rural areas of the County in general.
- Acknowledgement the application site has been the subject of previous planning permissions for its redevelopment, including for commercial and retail uses, albeit on a smaller scale.
- Request that a full Retail Impact Assessment and Sequential Assessment is undertaken and submitted as part of any application.
- Advised that given the site's proximity to Lampeter and its potential impact upon the town centre, any application will be the subject of consultation with Ceredigion Council.
- Due to the distance from the site to the Afon Teifi (a designated Special Area of Conservation) confirmation that the proposals will be subject to a Habitats Regulations Assessment (HRA) to establish whether the development is likely to have a significant impact upon the SAC.
- Confirmation that the site lies within the Afon Teifi Phosphate Sensitive Catchment Area and the application should be supported by an assessment to assess any potential from wastewater.
- Advised that the provision for active travellers, particularly pedestrians both within and to/from the site should be addressed as part of the application.
- Acknowledged that whilst the development is not defined as highly vulnerable by TAN15, the proposal is predominantly located within area at risk of flooding and any future application only be justified if the proposal complies with the tests set out in paragraph 6.2 of the current Technical Advice Note 15.
- Confirmation that the site is located within the Special Landscape Area of the Teifi Valley where proposals, through their design, appearance and landscape schemes must enhance or improve the area in line with Policy EQ6 of the LDP. A request for the application to be supported by a LVIA.
- Advised that materials that reflect the site's rural location in comparison to the average urban location for such a store is incorporated within any scheme and that a departure



from standard materials and designs is adopted to better reflect the particular circumstances of this site location and surroundings.

- Request that the application is supported by a full suite of plans, cross sections and street scene visuals, to including existing surrounding development and a noise assessment to enable a full assessment of the development's impact upon residential amenity.
- Request for a Welsh Language Report to demonstrate what measures will be taken to safeguard, promote and enhance the Welsh Language in the area.
- Advised that due to the presence of formal potentially contaminative land uses nearby that a contaminated land risk assessment is submitted as part of any future planning application.

2.8 Public Exhibition Event

- 2.8.1 A wide-ranging community consultation has been undertaken, which consisted of a leaflet, with a feedback form and Freepost envelope, being delivered to 2,257 local properties; an information website, with online feedback form; and a well-attended public exhibition, held locally on 9 October at Canolfan Creuddyn Centre in Lampeter.
- 2.8.2 Consultees have been invited to complete a feedback form. In short, 385 responses have been received to date with 92% in expressed support of the proposals.
- 2.8.3 In respect of matters raised during community consultation there was overwhelming support expressed over the delivery of much needed discount food store provision within Lampeter. Those who commented positively saw the need for enhanced local foodstore provision and competition. A number expressed the benefits of significantly reduced travel time and costs. Those who raised concerns, did so in respect of flood risk, traffic and that a further food store was not needed.

2.9 Statutory Planning Application Consultation

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



3.0 Planning Policy Context

3.1 The Development Plan

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

3.1.2 The Development Plan for this site comprises:

- The Carmarthenshire Local Development Plan (adopted December 2014)
- Future Wales – The National Plan 2040 (published February 2021)

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

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

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

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

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

3.2.5 Policy 12 'Regional Connectivity' refers to improving the connectivity in urban areas by integrating active and sustainable travel and public transport. Active travel is encouraged in all



new developments in the form of walking and cycling to promote a reduction in the reliance of the private car.

3.3 Carmarthenshire Local Development Plan

3.3.1 The Carmarthenshire County Council adopted their LDP in December 2014. It forms part of the statutory development plan alongside Future Wales - The National Plan 2040.

3.3.2 The LDP Proposals Map shows that the application site is not allocated for a specific use within the LDP and therefore constitutes 'white land'. In retail policy terms, the application site is not located within a designated retail centre and therefore occupies an 'out-of-centre' location. An extract from the LDP Map is provided Figure 4.1.

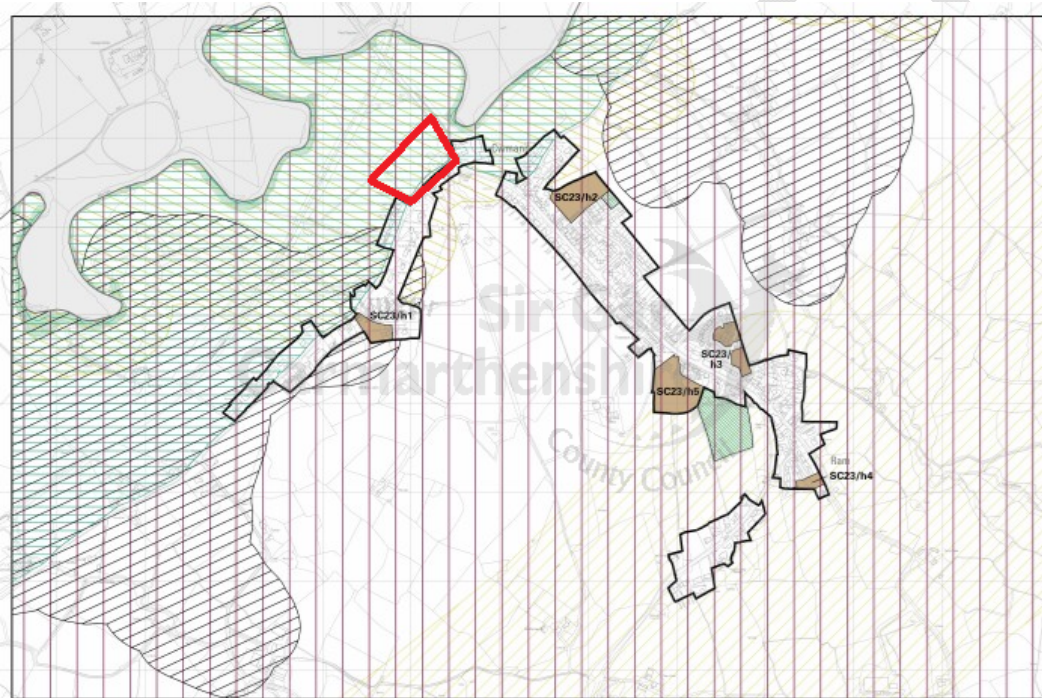


Figure 4.1: LDP Proposal Map Extract (approximate site boundary outlined in red)

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

Policy GP1 Sustainability and High-Quality Design – Provides the overarching framework for high design quality in development, conservation and enhancement in proposals. The policy advises that proposals should reflect the need to protect the amenity of those who work in, live in and visit the area. The siting and nature of uses should be considered in the light of their potential to cause an unacceptable nuisance.

Policy GP2 Development Limits – Proposals within defined Development Limits will be permitted, subject to policies and proposals of this Plan, national policies and other material planning considerations.



GP3 Planning Obligations – The Council will, where necessary seek developers to enter into Planning Obligations (Section 106 Agreements), or to contribute via the Community Infrastructure Levy to secure contributions to fund improvements to infrastructure, community facilities and other services to meet requirements arising from new developments.

Policy GP4 Infrastructure and New Development - Proposals for development will be permitted where the infrastructure is adequate to meet the needs of the development.

Policy RT1 Retail Hierarchy - Proposals will be considered in accordance with the County's retail hierarchy.

Policy EQ4 Biodiversity – Proposals for development which have an adverse impact on priority species, habitats and features of recognised principal importance to the conservation of biodiversity and nature conservation, will not be permitted, except where it can be demonstrated that: The impacts can be satisfactorily mitigated, acceptably minimised or appropriately managed to include net enhancements; and or there are exceptional circumstances where the reasons for the development or land use change clearly outweighs the need to safeguard the biodiversity and nature conservation interests of the site and where alternative habitat provision can be made in order to maintain and enhance local biodiversity.

Policy EQ5 Corridors, Networks and Features of Distinctiveness – Proposals for development which would not adversely affect those features which contribute local distinctiveness/qualities of the County, and to the management and/or development of ecological networks (wildlife corridor networks), accessible green corridors and their continuity and integrity will be permitted.

Policy EQ6 Special Landscape Areas - Special Landscape Areas (SLAs) represents a non-statutory designation which were identified following a formal assessment of the landscape qualities of the County. Their designation utilised the former CCW's Guidance Note in applying the results from the LANDMAP data. Whilst not intended to necessarily preclude development, it is intended to reflect the emphasis placed upon the term 'special' in their definition. The design of developments should be sensitive enough to ensure that the scheme makes a positive contribution to the landscape. In this regard, proposals will be expected to show that they will not have an unacceptable impact on their specific distinctive features or characteristics of the SLA.

Policy SP1 Sustainable Places and Spaces - development proposals will be supported if they follow sustainable development and design principles, such as by being sustainably located with good access to transport and facilities, as well as protecting biodiversity.

Policy SP2 Climate Change - Development proposals which respond to, are resilient to, adapt to and minimise for the causes and impacts of climate change will be supported.

Policy SP3 Sustainable Distribution – Settlement Framework – Provision for growth and development will be at sustainable locations in accordance with the Settlement Framework



outlined. Cwmann, the settlement which the site is adjacent to, is identified in the list of Sustainable Settlements; under 'Sustainable Community 23'.

Policy SP8 Retail - Proposals will be permitted where they maintain and enhance the existing retail provision within the County and protect and promote the viability and vitality of the defined retail centres. Proposals for small local convenience shopping facilities in rural and urban areas where they accord with the settlement framework will be supported.

Policy SP14 Protection and Enhancement of the Natural Environment – Development should reflect the need to protect, and wherever possible enhance the County's natural environment. All development proposals should be considered in accordance with national guidance/legislation and the policies and proposals of this Plan, with due consideration given to areas of nature conservation value, the countryside, landscapes and coastal areas.

Policy SP17 Infrastructure - Development will be directed to locations where adequate and appropriate infrastructure is available or can be readily provided.

Policy SP18 The Welsh Language - The interests of the Welsh language will be safeguarded and promoted.

Policy MPP3 Mineral Safeguarding - Planning permission will not be granted for development proposals where they would permanently sterilise resources of aggregates and coal identified within the mineral safeguarding areas (areas of search) identified on the proposals map unless mineral extraction is impracticable, environmentally unacceptable, or the development would have no significant impact on the resource.

Policy TR2 Location of Development: Transport Considerations - Proposals which have the potential to generate a significant number of trips either as an origin, or as a destination (including residential, employment, retail and leisure) will be expected through design, to maximise accessibility by alternative modes of transport.

Policy TR3 Highways in Developments: Design Considerations – Proposals should incorporate facilities encouraging and affording the opportunity to those attending the sites to utilise alternative means of transport. The policy goes on to state that proposals which do not generate unacceptable levels of traffic on the surrounding road network and would not be detrimental to highway safety or cause significant harm to the amenity of residents will be permitted.

Policy EP1 Water Quality and Resources - Proposals for development will be permitted where they do not lead to a deterioration of either the water environment and/or the quality of controlled waters. Proposals will, where appropriate, be expected to contribute towards improvements to water quality. Watercourses will be safeguarded through biodiversity/ecological buffer zones/corridors to protect aspects such as riparian habitats and species; water quality and provide for flood plain capacity. Proposals will be permitted where they do not have an adverse



impact on the nature conservation, fisheries, public access or water related recreation use of the rivers in the County.

Policy EP2 Pollution - Proposals for development should wherever possible seek to minimise the impacts of pollution.

Policy EP3 Sustainable Drainage - Proposals for development will be required to demonstrate that the impact of surface water drainage, including the effectiveness of incorporating Sustainable Drainage Systems (SUDS), has been fully investigated. The details and options resulting from the investigation must show that there are justifiable reasons for not incorporating SUDS into the scheme in accordance with section 8 of TAN 15.

3.4 Other Material Considerations

Carmarthenshire Second Revised Deposit Local Development Plan 2018-2033

- 3.4.1 On the 10 June 2024, the Council submitted its Second Revised Deposit LDP and associated documents to the Welsh Government and Planning Environment Decisions Wales (PEDW) for examination. Until the Revised LDP is adopted, the existing 2006-2021 LDP will remain in place for all planning decisions, in line with advice issued by the Welsh Government. Notwithstanding this, the emerging RLDP is a material consideration in decision making.

Planning Policy Wales Edition 12 (February 2024)

- 3.4.2 PPW 12 sets out the land use planning policies of the Welsh Government and is supported by a series of Technical Advice Notes (TANs). In accordance with the Well-Being of Future Generations (Wales) Act 2015, the primary objective of PPW, as set out at Paragraph 1.2, is “to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales”.
- 3.4.3 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, 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.

Technical Advice Notes

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



4.0 Assessment of Existing Provision

4.1 Introduction

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

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

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

4.2 The Primary Catchment Area (PCA)

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

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

4.2.2 In formulating the PCA careful regard has been paid to the shopping patterns identified in the household survey which underpins the assessment. Having regard to the largely rural locale and location of existing facilities, in particular Limited Assortment Discounters (LADs), the PCA is considered to broadly comprise an area of up to a c. 20-minute drive time (off peak) from the application site.

4.2.3 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 B**.



4.3 Designated Centres

4.3.1 The focus of the assessment of existing provision has been on the following PCA based centres.

- Lampeter Town Centre
- Llanybydder District Centre
- Tregaron Urban Service Centre

4.3.2 In accordance with PPW and TAN 4, a health-check assessment has been carried out of each of the centres, having regard to accepted vitality and viability indicators.

4.4 Lampeter Town Centre

4.4.1 Lampeter Town Centre is located c.650m north from the application site. Lampeter is a university market town that lies at the administrative boundary of Ceredigion and Carmarthenshire authority areas. The town centre has a mix of services and independent shops and is a popular tourist destination. It hosts a regular farmer's market and is served by a leisure centre and swimming pool and a local museum.

Diversity of Uses

4.4.2 CarneySweeney has investigated the composition of the town centre based on the extent of the centre outlined in the Experian GOAD plan. A GOAD plan of Lampeter Town Centre is shown at **Appendix C** for reference. The retail centre boundary of the GOAD plan is different to Lampeter's retail centre boundary of the Ceredigion's Local Development Plan (2013). The GOAD plan covers a slightly wider area and is considered for this assessment.

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

Table 1.0 Lampeter Centre – Composition of Uses

Sector	GOAD Survey March 2024		CS Survey August 2024		UK Average Sept 2024 %
	No. of Units	%	No. of Units	%	
Convenience	9	7.03	10	7.81	9.32
Comparison	38	29.69	38	29.69	26.30
Retail Services	21	16.41	20	15.62	15.97
Leisure Services	27	21.09	29	22.66	25.79
Financial & Business	13	10.16	13	10.16	8.30
Vacant	20	15.63	18	14.06	14.11
Total	128	100	128	100	100



4.4.4 Lampeter Town Centre shows a healthy mix of cafes, restaurants and grocers with a presence of well-known convenience shops including Co-op and Sainsburys and also independent retail shops and bakeries. The highest represented category in the centre is comparison services (29.69%), which is higher than the UK average of 26.30%. Retail and financial and business services are also higher than the UK average.

4.4.5 Although convenience 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

4.4.6 In March 2024, there were twenty identified vacant units and in August 2024 this had reduced to seventeen units. The vacancy rate at 14.06% in August 2024 shows a slightly lower rate than the UK average of 14.11%, which is within expected levels.

Accessibility

4.4.7 The town centre is easily accessible by both public and private transport. The centre is well located and can be accessed from A482 and A475.

4.4.8 The centre is not served by a train station and as such is considered less accessible. However, the centre is served by various bus services along the A482 and A475 providing services to surrounding neighbourhoods and wider areas including Tregaron, Aberystwyth and Carmarthen.

4.4.9 Most of the pavements throughout the centre are well maintained and have sufficient space for less abled users. There are no dedicated cycle lanes identified during the site visit, however, the centre is served by cycle stands at the main supermarkets, Co-op and Sainsbury's.

Pedestrian Flows

4.4.10 In respect of pedestrian activity levels, the busiest observed areas are at the public area, by the monument adjacent to the HSBC, and Sainsbury's. The west of the centre on A475 was observed to have a low footfall level.

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

Perception of Safety

4.4.12 Throughout the site visit, Lampeter town centre felt safe. Public areas are monitored by CCTV cameras. In terms of lighting, the centre appears to be well furnished with street lighting to help provide a safe environment at night.

Environmental Quality

4.4.13 The retail centre is generally tidy and well maintained. It is served by street furniture around the centre, which creates a welcoming environment. Hanging baskets were present throughout the



retail centre at the frontage of the retail shops, which lifts the overall quality and amenity of the public realm. There are no major litter or graffiti issues observed in the town centre. Overall, the centre’s environmental quality is considered to be high.

4.5 Llanybydder Centre

4.5.1 Llanybydder District Centre is located c.6.8km south west from the application site and is within flood zone risk 1. Llanybydder is small market town located on the A485 that connects the town with Carmarthen. The centre is focused along Heol Caerfyrddin and Heol Llanbedr and provides sufficient services and facilities to the surrounding residential population.

Diversity Of Uses

4.5.2 The composition of units within Llanybydder District Centre is set out in the table below.

Table 1.1 Llanybydder Centre – Composition of Uses

Sector	August 2024		UK Average Sept 2024 %
	No. of Units	%	
Convenience	1	14.29	9.32
Comparison	0	0	26.30
Retail Services	2	28.57	15.97
Leisure Services	3	42.86	25.79
Financial & Business	0	0	8.30
Vacant	1	14.29	14.11
Total	7	100	100

4.5.3 The centre totals seven units and has a strong presence of leisure services. The only convenience service within the district centre is the Nisa store and it is sufficient to provide a day to day shopping service to Llanybydder.

Vacancies

4.5.4 There is one vacant unit within Llanybydder District Centre. The centre’s vacancy rate is within expected levels for centre of such a small scale.

4.5.5 During the site visit there is a dwelling for sale (c.100 sqm) and residential land (c.1,000 sqm) for sale. However, due to the sizes and land use of the sites, these are not sequentially preferable for the proposed Lidl store and they are also classified as residential uses.



Accessibility

4.5.6 The district centre is easily accessible by private transport. The A485 and B4337 directly serves the centre. The district centre can also be accessed by public transport, as Llanybydder War Memorial and Cross Hands Hotel bus stops provides bus services to surrounding residential areas and wider areas including Carmarthen and Lampeter.

Pedestrian Flows

4.5.7 The observed pedestrian activity was low during site visit in the morning. However, observations indicate that Empire Garage vehicle repair shop lies at the south of the district centre and generates higher footfall compared to other outlets.

Perception of safety

4.5.8 Throughout the site visit, the district centre felt safe. The centre is served by CCTV monitoring cameras and there appears to be adequate street lighting for safety at night.

Environmental Quality

4.5.9 The retail centre is generally tidy and well maintained. There were hanging baskets on the Cross Hands Hotel building and benches were present outside the Hotel which lifts the overall quality and amenity of the public realm. There were no clear litter or graffiti issues in the district centre.

4.6 Tregaron Centre

4.6.1 Tregaron is an ancient market town and is located c.15.6km north east from the application site. Tregaron is defined as an Urban Service Centre within Ceredigion County Council. The retail centre provides a strong leisure service within the retail centre. In terms of flood risk, the centre is primarily within flood zone risk 3 and some parts of the centre are in flood zone risk 2.



Diversity Of Uses

4.6.2 The composition units within Tregaron Urban Service Centre is set out in the table below Table 1.2 Park Crescent Composition of Uses

Table 1.2 Tregaron Centre – Composition of Uses

Sector	Units – August 2024		UK Average Sept 2024 %
	No.	%	
Convenience	4	13.80	9.32
Comparison	5	17.24	26.30
Retail Services	6	20.69	15.97
Leisure Services	8	27.59	25.79
Financial & Business	3	10.34	8.30
Vacant	3	10.34	14.11
Total	29	100	100

4.6.3 The centre totals 29 units and the highest represented category in the centre is leisure services (27.59%), which is higher than the UK average of 25.79%. The main convenience service within the centre is the Spar which provides the essentials for the local area.

Vacancies

4.6.4 The centre displays three vacant units, which equates to 10.34%, below the national 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. The centre displays no predominantly vacant areas which may otherwise give rise to concern.

Accessibility

4.6.5 The centre is mainly accessible by private transport. The centre is well located and can be accessed from A485 and B4343. The A485 connects to Lampeter and it also connects to A487



which leads to Aberystwyth. The centre is primarily served by one Talbot Yard Pay and Display Public Car Park. There are also free on street car parks scattered across the centre.

- 4.6.6 There are bus services, however these are infrequent services to surrounding neighbourhoods and wider areas including Lampeter and Aberystwyth.

Pedestrian Flows

- 4.6.7 The observed pedestrian flow was moderately low during the site visit and the busiest area of the centre was observed to be at the north of the retail centre close to the Spar. Lower levels of footfall were observed at Chapel Street, potentially due to the services provided in the area.

Perception of safety

- 4.6.8 Throughout the site visit, Tregaron felt safe. The centre is well served by street lighting and CCTV.

Environmental Quality

- 4.6.9 Generally, shopfronts and building facades are well maintained throughout the centre. The quality of the central area of Tregaron is generally good with is served by public benches and soft landscaping features including planters were present which helps to lift the environmental quality. There are also picnic benches placed outside of Y Talbot which creates a welcoming environment. There were also little to no litter or graffiti in the centre.

4.7 Summary

- 4.7.1 In summary, all of the three centres appear to be in good health, are easily accessible via private transport and are perceived to be safe, well maintained shopping environments with benches / picnic benches present in all three centres. All of the three retail centres display a lower vacancy rate compared to the UK average, which is an indication of vitality and viability. The centres are considered to be vital and viable in servicing their respective local / neighbourhood functions.



5.0 The Need for the Proposed Development

5.1 Introduction

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

5.2 Quantitative capacity

- 5.2.1 The below table provides simple convenience expenditure capacity analysis within the PCA at 2029 i.e., the design year of the proposed store. The data outlined is provided in detail in **Appendix D** of this Statement.



Table 1.3: Quantitative Convenience Capacity, 2029

	2024	2029
[1] Available Convenience Expenditure in PCA (£m)	37.0	36.5
[2] Turnover of existing stores in PCA (£m)	18.9	19.7
[3] PCA derived convenience turnover of development (£m)		9.9
[4] Turnover of Convenience Retail Commitments in PCA (£m)		
[5] Total PCA turnover (£m)	18.9	29.7
[6a] PCA convenience expenditure capacity (£m)	18.2	6.9
[6b] Retained market share of PCA expenditure (%)	51.0	81.2

Notes:

[1] taken from table 4 Appendix D

[2] taken from table 6 Appendix D. Projected forward to 2029.

[3] taken from table 7a Appendix D

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

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

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

- 5.2.2 The above analysis (drawn from Appendix D of this Statement) shows, in a straightforward manner, there is ample unmet expenditure in the PCA to sustain additional local convenience retail floorspace in 2029 (the design year of the store). The above table shows currently (2024) only c.£18.9m of an available £37.0m is being spent in PCA based stores. Indeed, only c.£19.7m [2] of a total available expenditure of c.£36.5 [1] is anticipated to be spent in PCA based stores in 2029.
- 5.2.3 The analysis clearly shows Cwmann/Lampeter has a strikingly low market share of PCA based expenditure (51%), which will worsen over time as the local population grows. The current paucity of convenience goods facilities in Lampeter and in particular the absence of the highly popular LAD format locally, means (PCA) expenditure is spent or “leaked” to competing centres/stores further afield; this is outlined in local feedback provided during the pre-application consultation exhibition process (and addressed in the PAC Report).
- 5.2.4 Whilst some modest proportion of ‘leakage’ can generally be expected to higher order centres for non-food i.e., comparison retailing (as people seek greater choice and ‘comparison’), food shopping is typically carried out on a “convenience” basis where proximity is a key determinant; indeed, this is advocated – put simply, the most sustainable way to shop is to shop where you live. This policy approach which is well established in PPW and TAN4, and promoted in Future



Wales, The significant proportion of leakage for food shopping identified in Cwmann/Lampeter is wholly unsustainable.

- 5.2.5 In 2029, accounting for commitments, there is clear local expenditure capacity to support the proposed new store. Indeed, the analysis shows following the delivery of the store the retained market share of PCA expenditure should increase to a more-healthy c.81% market share i.e. more people will shop locally.
- 5.2.6 Quantitative need for additional foodstore provision in the PCA is established.

5.3 Qualitative Considerations

- 5.3.1 Qualitative need is also an important consideration. It reflects the increasing recognition of the wider economic, social and environmental considerations in determining planning applications for retail proposals. It is of particular relevance in securing accessible, efficient, competitive and innovative retail provision which, in turn will allow increased investment and stimulate job creation.
- 5.3.2 Qualitative need considerations can include (but are not limited to) addressing issues associated with existing store operational inefficiencies/ deficiencies, improving accessibility and counteracting unsustainable shopping patterns.
- 5.3.3 When considering 'need' it is crucial to note in this instance that the proposal is for a materially different retail foodstore to that currently available in Cwmann/Lampeter. Neither settlement is currently served by a Limited Assortment Discounter (LAD) such as Lidl. The fact that Lidl is taking the multi-million-pound commercial investment decision to locate to Cwmann/Lampeter is a very strong indication itself of a) the strength of the existing customer base; b) the importance of the store in meeting local needs; and c) the pressing need for improved local facilities.
- 5.3.4 The Carmarthenshire Retail Study Update (CRSU) Final Report (January 2023) provides an assessment of retail need and floorspace recommendations for the County. It finds (at paragraph 4.36) there is a deficiency in foodstore provision in the rural areas in the north, west and northeast of the County (i.e. Zones 4, 5 and 6 – Cwmann lies within zone 5 of the CRSU). There is considered to be a qualitative need for improved local provision in the north of the County as highlighted in the CRSU.

Meeting Local Consumer Need

- 5.3.5 It has been established LAD retailers fulfil a clear role, separate to mainstream supermarkets, and can often act as a complementary offer, rather than direct competition. The limited LAD product range does distinguish Lidl from other retailers including main grocers (Asda,



Morrison's, Tesco, Sainsbury's, Waitrose), freezer centres (Iceland) and multiple and independent convenience stores.

- 5.3.6 In allowing a planning appeal for a Lidl foodstore in Huntingdon the Inspector concluded that: *“as it would represent a specialist discount foodstore, I find that there is insufficient evidence to show that it would cause any significant harm to this vitality and viability, particularly as it would not compete directly with the retail premises and would be complementary to the activities within the Town Centre”* (para 25).
- 5.3.7 Lidl does not stock convenience goods such as tobacco, or individual confectionary items and only stocks limited pre-packed fish and meat and individual fruit and vegetable products. This places it in a different market from most independent retailers, which offer such goods over a counter e.g., in-store delicatessen, bakery and butchers. This, coupled with the lack of any instore concessions such as post office, newsagent, hot-food & coffee, pharmacy, travel agent, opticians or other in-house facilities mean that overlap with town centre retailers is typically limited.
- 5.3.8 The Competition Commission, Planning Inspectors and Secretary of State have expressly recognised that LADs offer particular benefits of quality and value distinct from main grocers. The number of value lines that the main grocers stock is limited, whereas the whole of the LAD business model is geared to providing exceptional value.
- 5.3.9 Typically, food shoppers carry out a main food shop once a week and when carrying out food shopping a significant proportion of shoppers ‘link trips’ with other non-food shops, further outlining the benefits of retaining expenditure locally.
- 5.3.10 It is a c.10 minute walk (c.800m approx.) to/from Lampeter centre from the application site. The route is flat and legible. It is proposed to encourage visits on foot as part of the proposals through active travel improvements. The site is the most sequentially preferable site available. It will not draw users away from Lampeter centre, the identified low market share highlights shoppers are already predominantly shopping elsewhere. On the contrary, it will draw users to stay in Cwmann/ Lampeter and increase settlement self-containment.

Increase in Local Employment

- 5.3.11 The proposed foodstore will generate up to 40 new jobs (Full Time Equivalent) with a combination of full and part time roles; the aim of which is for c.80% of which to be employed from the immediate surrounding area. The proposal therefore provides a strong economic benefit for the local economy and jobs market in Cwmann/Lampeter, as well as surrounding areas.
- 5.3.12 In addition to 40 direct jobs, significantly more indirect jobs will be provided by the development. These could include construction jobs as the store is built; delivery driving jobs to serve the store once operational; and warehouse jobs at Lidl's regional warehouse. Lidl currently pay a retail



industry leading wage of £12.40/hour, increasing to £13.35 hour for long service. This benefit is also particularly important in the local context, where rural unemployment levels persist.

Counteract Unsustainable Shopping Patterns

5.3.13 Typically, the top three reasons for residents' choice of foodstore are:

1. Low prices/value for money;
2. Close to home (i.e. "convenient"); and
3. Quality/ range of goods available.

5.3.14 It is important to note the following:

- There are no LAD stores i.e. Lidl (or Aldi) stores within c.40 minutes (off-peak) of Cwmann/ Lampeter;
- The nearest existing Lidl stores are c.50 minutes (off-peak) drive time at Aberystwyth and Carmarthen;
- Two other Lidl stores are within c.60 minutes (off-peak) drive time at Cross Hands & Ammanford

5.3.15 Lidl's existing stores are drawing significant levels of trade from Cwmann/Lampeter based residents as the closest available LAD stores to residents currently. This demonstrates the existing latent demand for the LAD retail format from Cwmann/Lampeter and the prevailing unsustainable nature of shopping in Cwmann/Lampeter currently.

5.3.16 The PAC report submitted with the application details the local feedback provided from the public consultation of the proposals. This makes clear the overwhelming majority of support for the proposals and the key reasons for this support; principal among them is the pressing need for a LAD (main food) foodstore. The local feedback makes clear that there are only two convenience stores in Lampeter capable of serving the area for weekly main food shopping. Basket shop analysis shows these stores are uncompetitive on price. The analysis shows that across a broad selection of produce Lidl offers customers significantly better value than currently available locally. Local feedback also makes clear that a strong value proposition is required to serve the local area which will help people with the cost-of-living crisis.

5.3.17 The rationale for the proposed store is clear; improved facilities are required to ably meet local need and counteract the existing unsustainable shopping patterns i.e., the outflow or 'leakage' of expenditure to surrounding settlements. The most popular destinations for Cwmann and Lampeter based residents are Carmarthen and Aberystwyth. Simply put, obtaining planning permission will allow Lidl to suitably serve local needs, locally. Residents will also benefit from significant savings in fuel; a round trip to Lidl at Friar's Park, Carmarthen is c.48 miles or to Lidl, Alexandra Road in Aberystwyth is c.50 miles. Local highways will benefit from the shortened journey times. By improving local choice, Cwmann/Lampeter will be better equipped to meet



local needs and, in turn, counteract any propensity for shoppers to shop further afield; this is considered in the Transport Assessment accompanying the application.

5.3.18 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. Notwithstanding this the store is the latest generation of Lidl store, providing ancillary staff/welfare facilities, and customer toilets etc. The store layout is sufficiently spacious and well equipped to cater for its shoppers and will prove to be a popular, convenient local main-food shopping destination for local residents.

5.4 Summary

5.4.1 Quantitative and qualitative need for the proposed development has been demonstrated. Improved retail provision will help counteract unsustainable travel and will ensure local needs are met locally in accordance with PPW’s sustainable development principles and placemaking objectives.

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

PAC DRAFT



6.0 The Sequential Approach to Site Selection

6.1 Introduction

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

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

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

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

6.2 Status of the application site

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

6.3 Application of the Sequential Approach

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

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

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



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

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

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

² *Ibid*

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

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

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



- 6.3.9 In the Scotch Corner appeal⁶ the SoS endorsed the Inspector’s conclusion that the NPPF does not require disaggregation. This sets a baseline position where the SoS has decided disaggregation does not apply.
- 6.3.10 Against this backdrop of case law and recovered appeal decisions, PPW was revised in November 2016 (in the form of Edition 9 at that time). Edition 8 had previously stated, at paragraph 10.3.5:
- “To maximise the opportunities for new development in centres, developers and retailers will need to be more flexible and innovative about the format, design and scale of proposed development and the amount of car parking, tailoring these to fit the local circumstances. Rather than propose developments with a mixture of large-scale retail and/or leisure uses and a large amount of car parking which can only be accommodated at single site out-of-centre or even out-of-town locations, developers are expected to demonstrate why they could not develop elements of the larger scheme on a site, or a number of sites, in more central locations with less car parking.”*
- 6.3.11 This wording, which required disaggregation of elements of the scheme onto multiple sites was removed from PPW. Policy in Wales, therefore, does not require demonstration of a disaggregated approach (consistent with England and recent case law). It is clear, therefore that disaggregation is not a policy requirement.
- 6.3.12 For a site to be suitable, it would have to be a genuine “real world” alternative for the development. If the appeal were dismissed, would the developer build the development on the sequentially preferable site is the relevant question (Telford Forge appeal, para 19).

6.4 Site Search Parameters

Flexibility

- 6.4.1 Delivering the LAD operational model has consequences for the design and layout of the stores. A critical component of the operational model is the size and configuration of the store which supports efficient stock handling procedures and an ability to stock standard product lines in sufficient depth to minimise servicing costs.
- 6.4.2 The restriction that this places on the ability of Lidl to be ‘flexible’ in its format is relevant to the sequential approach. This has been accepted by the Secretary of State and Inspectors in appeal decisions relating to Lidl foodstores, and by very many LPAs in their consideration of Lidl’s applications.

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



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

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

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

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

- a minimum site size of circa 0.6ha;
- a minimum net floorspace of c.1,672sqm on a single level. There is no prospect for disaggregation in this instance;
- approximately 100 adjacent surface level parking spaces. A site that is able to offer adjacent surface level car parking, so that customers can easily transfer goods to their vehicles, as they can from the existing store. To have otherwise would severely impact the appeal and viability of the store;
- A site that can allow for the safe manoeuvring of customer vehicles and delivery vehicles on site;
- A prominent site with the ability to attract passing trade;
- A site that is able to offer adjacent surface level car parking, so that customers can easily transfer goods to their vehicles.; and
- Provision of a dedicated service area to the rear of the store, including the ability to



accommodate HGVs (Heavy Goods Vehicles).

4.0.2 All the above are key operational and locational requirements.

Definition of Availability

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

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

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

6.5 Sequential Site Search

6.5.1 The assessment is based on research undertaken by Carneysweeney, including site visits to other competing retail destinations and relevant centres within the catchment area in August 2024. This process has included:

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

6.5.2 The sequential assessment focusses on the following:

- Lampeter Town Centre and Edge of Centre Sites
- Llanybydder District Centre and Edge of Centre Sites
- Tregaron Urban Service Centre and Edge of Centre Sites

6.6 Assessment of Alternative Sites

Lampeter Town Centre

6.6.1 Lampeter Town Centre is located 615m to the north of the application site within the administrative boundary of Ceredigion. The town centre boundary is defined on the Ceredigion



LDP proposals map. Lampeter town centre is within Flood Zone A. Land to the south, east and west of the built-up area of Lampeter lies within Flood Zone B and C2.

- 6.6.2 The centre is focused on the main road junction of A475 and A482. Lampeter Town Centre is relatively small, densely developed and physically constrained. These characteristics increase the challenge of identifying sequentially preferable alternative sites. An extract of the Ceredigion LDP Proposals Map, with the extent of the town centre boundary is shown in Figure 7.1.

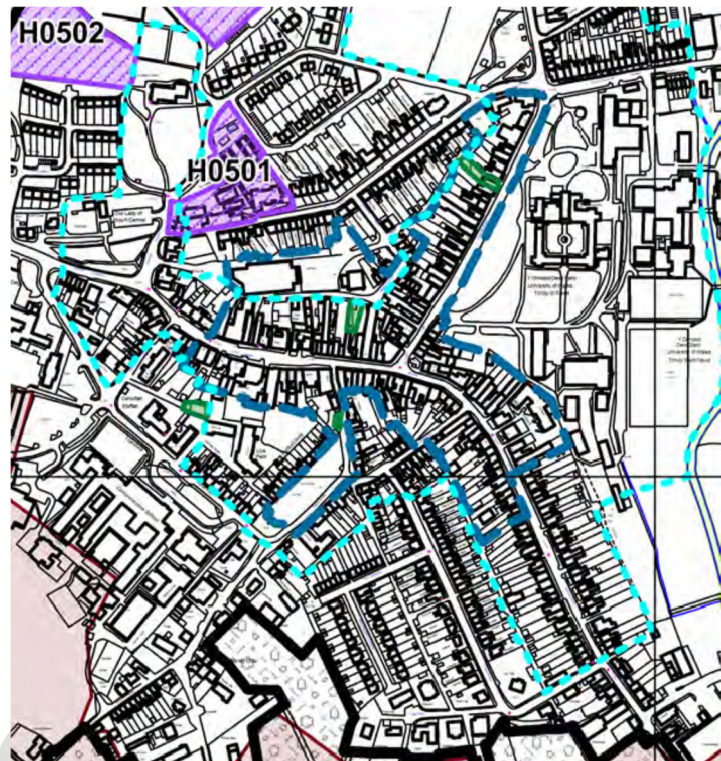


Figure 7.1 – Ceredigion LDP Proposals Map Extract – Lampeter (town centre boundary outlined in navy blue hatched line)

Site 1: Ceredigion Car Park (and Open Market), Peterwell Terrace (In Centre)

- 6.6.3 This narrow-shaped site lies within the boundary of Lampeter Town Centre off Peterwell Terrace. The site measures approximately 0.3ha. The site operates as Ceredigion Council car park forms an important function for Lampeter town centre. It is understood the site is not being actively marketed and not available for the proposed development (within a reasonable time period). In addition, at 0.3ha the site is too small for the proposed development, even allowing for flexibility. Accordingly, the site has been discounted.

Site 2: Ceredigion Car Park (Mount Walk (Edge of Centre)

- 6.6.4 A triangular shaped car park lies to the west of Lampeter town centre in an edge of centre location. The site measures approximately 0.2ha. The site operates as Ceredigion Council car



park forms an important function for Lampeter town centre. It is understood the site is not being actively marketed and not available for the proposed development (within a reasonable time period). In addition, at 0.22ha the site is too small for the proposed development, even allowing for flexibility. Accordingly, the site has been discounted.

Site 3: Lampeter Town Centre Vacant Units

6.6.5 As outlined in Section 5.0 above, the vacancy rate in Lampeter Town Centre is relatively low c.14.06%. There are 18no. vacant units in the centre (at time of survey):

Table 1.4: Lampeter Centre Vacant units

Address	Previous Use (if known)	Size (sq.m)	Commentary
8, 9 High St, Lampeter SA48 7BQ	Commercial	c.175 to c.230	Too small to accommodate a Lidl foodstore even when allowing for flexibility. On this basis the units are deemed unsuitable and discounted.
28, 35, 37 High St, Lampeter SA48 7BB	Commercial	c.50 to c.300	
18, 19 Harford Square, Lampeter SA48 7HE	Commercial	Up to c.90	
17A, 56, 81, 85 Bridge St, Lampeter SA48 7AA	Commercial	Up to c.130	
13 Drovers Rd, Lampeter SA48 7AT	Business/ Financial Service	c.250	
Adjacent to 14 Drovers Rd, Lampeter SA48 7AT	Social Club	c.300	
Adjacent to Lampeter Museum Old Porters Lodge, College Street, Lampeter SA48 7ED	Unknown	c.30	
Opposite to Sainsbury's Car Park	Unknown	c.40	
Adjacent to Mydentist, Market Place, Lampeter	Unknown	c.85	
Mount Walk, Lampeter	Unknown	c.230	
Station Terrace, Lampeter SA48 7HH	Shop	c.170	



Site 4: Land to the South of Pontbraen Road, University of Trinity College playing fields

6.6.6 Lidl is aware of an Aldi foodstore proposal being promoted on an out of centre site at Pontfaen Road, Lampeter, on land at the University of Trinity College playing fields. The site, which lies within the administrative boundary of Ceredigion County Council, was recently reported to Planning Committee on 10 July 2024 with a recommendation for refusal (Application ref. A211186). The Aldi proposal is contrary to planning policy in numerous respects. Indeed, as set out in the Officer’s report to Planning Committee the redevelopment of the site for a LAD store would result in:

- A significant adverse effect on the characteristics of the landscape;
- A significant adverse effect, of major magnitude, on the setting of the Grade II Listed Pavilion located on the site; and
- A significant adverse effect on the character and appearance of Lampeter Conservation Area.

6.6.7 Accordingly, the site has been discounted.

6.6.8 It is concluded that there are no sites within Lampeter Town Centre, Edge of Centre or Out of Centre that can be considered available, suitable or viable for Lidl food store.

Llanybydder District Centre

4.0.3 Llanybydder District Centre is located approximately 6.8km southwest from the application site. The local retail offer and services are located around the traditional centre at Market Place/Bridge Street as well as the A485/B4337 crossroads. The centre is characterised by a small retail centre geared towards the local day to day shopping. The centre comprising of 7no. units including 1no. vacant unit. The centre boundary of Llanybydder is not defined on Carmarthenshire LDP Proposals Map.

Site 5: Llanybydder Centre Vacant Units

4.0.4 There is 1no. vacant unit in the centre (at time of survey):

Table 1.5: Llanybydder Centre Vacant units

Address	Previous Use (if known)	Size (sq.m)	Commentary
The Cellar Bar, Heol Caerfyrddin, Llanybydder SA40 9TX	Restaurant	c.415	Too small to accommodate a Lidl food store even when allowing for flexibility. On this basis the unit is deemed unsuitable and discounted.



Site 6: Land adjacent to Cross Hands Hotel

6.6.9 This land measures approximately 750sqm in total. The site was previous used as a car park for Cross Hands Hotel. It appears to have not been maintained and as a result overgrown with vegetation. The site was granted planning permission (ref. W/10612) in 2010 for 2 no. residential dwellings. At 750sqm the site is significantly too small for the proposed development, even allowing for flexibility. Accordingly, the site has been discounted.

Site 7: The Old Foundry (LDP Allocation T3/11/E1)

6.6.10 Land at Old Foundry/Station Terrace is approximately 0.51 ha and to the rear of the Station Terrace car park in the commercial core of Llanybydder is an edge of centre location. It forms part of a larger existing employment area known as the Old Foundry that includes the vehicle dealership and garage (Cawdor Cars). The site has remained underutilised for many years and is currently used for storage and sales purposes. Planning permission was granted in 2019 for a new industrial building which was unimplemented and has since lapsed (ref. W/38609).

6.6.11 The site does not have the commercial prominence to sustain a main food store. The proposed development's scale is at odds with the role and function the district centre is intended to perform. Moreover, the site is allocated for employment development under Policy SP7 in the adopted LDP (and Policy EME3 in the emerging LDP). At 0.5ha the site is too small for the proposed development, even allowing for flexibility. Accordingly, it is not considered suitable or available for the proposed retail development and has been discounted.

6.6.12 It is concluded that there are no sites within Llanybydder District Centre or Edge of Centre that can be considered available, suitable or viable for Lidl food store.

Tregaron Urban Service Centre

6.6.13 Tregaron is located c.15.6km north-east from the application site. Tregaron Urban Service Centre lies within administrative boundary of Ceredigion Council and the centre is defined by the adopted Ceredigion LDP Proposals Map. The centre is very small and focused around the junction of the A485 and B4343 and the slightly separate main square, resulting in a linear centre



but with commercial uses interspersed with residential. An extract of Tregaron Local Centre is provided in Figure 6.2.

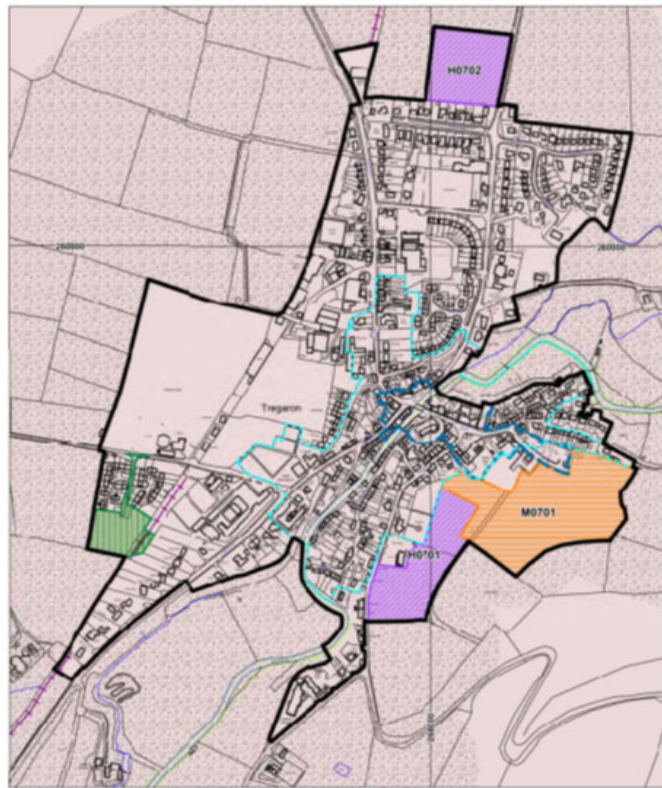


Figure 6.2 Ceredigion LDP Proposals Map Extract – Tregaron (centre boundary outlined in navy blue hatched line)

Site 8: Tregaron Centre Vacant Units

6.6.14 As outlined in Section 5.0 above, the vacancy rate in Tregaron Urban Service Centre is relatively low (c.10.34%), lower than the national average (c.14%). There are 2no. vacant units in the centre (at time of survey):

Table 1.5: Tregaron Centre Vacant units

Address	Previous Use (if known)	Size (sq.m)	Commentary
Castle House The Square, Tregaron SY25 6JL	Butcher	Less than 100sqm	Too small to accommodate a Lidl food store even when allowing for flexibility. On this basis the unit is deemed unsuitable and discounted.
4 Dewi Rd, Tregaron	Local Council Offices	c.170	Too small to accommodate a Lidl food store even when allowing for flexibility. On this basis the unit is deemed unsuitable and discounted.



Site 9: Land to the rear of Talbot Yard, Cylch Caron, Dewi Road, Tregaron (Edge of Centre)
(LDP Allocation M0701 and H0701)

- 6.6.15 The site is allocated in the adopted LDP for mixed use development and housing development. Outline planning permission was granted on the for Class D1, C2 and C3 uses in 2016, with reserved matters approved in 2020 on the northern extent of the parcel for Class D1 and C2 uses. The allocation/site is therefore not available as an alternative to the application site.
- 6.6.16 It is concluded that there are no sites within Tregaron Urban Service Centre or Edge of Centre that can be considered available, suitable or viable for Lidl food store.

6.7 Summary

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



7.0 Assessment of Impact

7.1 Introduction

7.1.1 This section of the report considers the anticipated diversion of retail trade to the proposed foodstore and the potential trading impact of the proposals, with particular regard to Lampeter centre.

7.1.2 PPW paragraph 4.3.26 advises that for development of 2,500sqm gross or more an impact assessment should accompany planning applications for main town centre uses that are not in a centre. At c.1,962sqm gross the store is comfortably under the threshold whereby impact assessments are typically sought. Notwithstanding this, following pre-application discussions with the LPA and in the interests of robustness, this section provides a proportionate impact assessment.

7.2 Methodology and evidence base

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

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

7.2.2 The catchment area is outlined at Appendix B. Impact is assessed up to five years from the time of the application being made (base year). The design year of 2029 has been adopted for testing impact.

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

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

Step 3 - Assess turnover and trade draw.

7.2.4 The use of available retail evidence, typically derived from household telephone survey information to identify existing shopping patterns and catchment area derived turnover levels of existing facilities is a widely adopted and industry accepted approach to understanding the turnover of existing facilities. In addition, the use of published evidence of sales densities



derived from company accounts also provides an industry accepted approach upon which to gauge the turnover of a proposed development.

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

Step 4 - Assess impact on existing centres.

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

Step 5 – Consider consequences of impact.

- 7.2.8 Any conclusions should be proportionate. It is important that the impacts are considered on the vitality and viability of the whole of a centre, not simply on individual facilities which may be similar to the proposed development.
- 7.2.9 This assessment utilises the most up to date quantitative retail evidence available from a combination of sources including the South-West Wales Regional Retail Study (Carter Jonas, 2017). Where appropriate existing store turnover information has also been derived from planning application ref: A211186 which is underpinned by a more up to date, independent household survey of convenience shopping than the SWRRS, updated as necessary. In addition, the Carmarthenshire Retail Study Update (2023) has been utilised, updated as appropriate.
- 7.2.10 Population and expenditure per capita estimates and growth rates have been obtained from Experian, accounting for special forms of trading (SFT) i.e., non-stores sales such as internet shopping. The assessment utilises a 2022 price base throughout.
- 7.2.11 The level of trade diversion is based on the generally acknowledged principles that:
- the trading effect on existing floorspace would generally be proportionate to their distance from the proposed new store. Numerous surveys of shopping patterns throughout the UK suggests that customers generally seek to go to the store that is nearest to their place of residence which can provide for their particular shopping needs; and
 - stores tend to compete on a 'like with like' basis, such that main foodstore proposals which have dedicated surface level car parking and provide a similar range of in-store customer facilities, would tend to compete directly for trade. This is particularly true of LAD stores



which employ a distinct discount focussed operational model, the details of which are outlined in Section 2.0 above.

7.2.12 Accordingly, this assessment is fully in accordance with prevailing recommendations and guidance in quantifying retail impact and comprises an orthodox and industry accepted approach to assessing impact. The statistical tables referred to in this section are provided at Appendix D.

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

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

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

7.3.2 Retail allocations have been considered as part of the sequential investigations undertaken as outlined in Section 6.0 above. 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.

7.4 Impact on allocated sites outside centres

7.4.1 As outlined above retail allocations outside centres have also been considered in detail as part of the sequential investigations undertaken as outlined in Section 6 above. There are no allocated sites outside centres in the catchment area upon which the proposed development may unacceptably impact.

7.5 Cumulative effects of the development

7.5.1 There are no known, notable outstanding retail planning permissions within the catchment area for inclusion as part of this assessment. As outlined in Section 2.0 above, the application site is itself a committed retail site. Permission was granted in November 2002 at the site for the erection of a service station including forecourt sales building, petrol pumps & canopy car wash bay & jet wash bay. This was a renewal of permission ref. W/01002. This permission has been implemented and is extant. The permission permits up to 250sqm of retail floorspace (A1) use on the site. As outlined in Appendix D we estimate the development could turnover c.2.5m if



delivered. However, subject to permission being granted for the currently proposed scheme this committed development would not come forward.

7.6 Impact on centre vitality and viability and in-centre turnover and trade

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

7.6.2 It is widely accepted that retail uses tend to compete with their most comparable competitive facilities. For example, in an area already served by large modern convenience or comparison stores, the effects of new large 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 development will compete predominantly on a like for like basis with other foodstores, most notably those nearest to the proposed development with broadly comparable retail offers.

7.6.3 The following paragraphs assess the potential impact of the proposal on in-centre turnover. The current health of centres is considered (see section 4, above), before conclusions are drawn on the impact on in-centre turnover and trade.

7.6.4 In considering impact on in-centre trade this section draws on the assessed retail turnover of the proposal and also considers growth in available expenditure within the catchment area. A detailed trading assessment of the potential impact that the proposal is likely to have on the patterns of retail expenditure in the surrounding area is then provided.

Turnover

7.6.5 Turnover is set out in detail in at Appendix D. The annual total turnover (convenience and comparison) of the proposed development is assessed to be c.11.1m in 2029. The convenience turnover of the proposed development is assessed to be c.£9.8m in 2029.

Expenditure Growth

7.6.6 The tables provided in Appendix C apply local estimates of expenditure per person to the resident population within the PCA to forecast the available retail expenditure generated over the period to 2027.



Table 1.6: Expenditure growth within PCA, 2024-29

Year	Population	Total Convenience Expenditure	Total Comparison Expenditure
2024	14,344	£37m	£39.3m
2029	14,344	£36.5m	£43.8m
Expenditure	£m	-£0.5m	£4.6m
Growth 2024-2029	%	-1.4	11.6

Notes: Derived from tables at Appendix D

7.6.7 Analysis of expenditure growth can help provide an indication of the potential impact of a proposal. The above table demonstrates the underlying position within the PCA is one in which comparison expenditure is expected to grow to 2029.

7.6.8 The above analysis alone demonstrates there is sufficient expenditure growth to support any additional comparison turnover. However, it is important to note Lidl's non-food offer is very modest, sold on a WIGIG basis (When It's Gone Its 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 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. As such, the remainder of this section focuses on the quantitative effect of the proposed convenience floorspace.

Trading Assessment

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

7.6.10 Set out at Table 9 of Appendix D is an assessment of how the introduction of the proposal will affect the projected retail turnovers of facilities within the surrounding area.

7.6.11 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 (2024 (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 2029 (the design year) for testing impact assuming that each location maintains its current market share of expenditure.



- iii. Taking into account any changes in shopping patterns resulting from relevant retail commitments if applicable.
- iv. Assessing the pattern of trade draw to the proposal on the basis that foodstores will compete predominantly like for like with other foodstores.
- v. Calculating the quantitative impact of the proposal, in terms of:
 - The percentage reduction in trade at each store/centre at 2029; and
 - The percentage change in retail turnover in each store/centre between 2024 to 2029.

7.6.12 The analysis is based on an analysis of existing stores/centre turnovers derived from the latest available population and expenditure information obtained from Experian and informed by a household survey shopping patterns.

7.6.13 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. Impact must be weighed in the context of the whole of the centre. Accordingly, Table 9 considers the overall impact of PCA based stores/centres.

7.6.14 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 stores elsewhere.

7.6.15 Existing trading patterns need to be taken into account, but as outlined a guiding principle impact is assessed on a 'like for like' basis in respect of the convenience sector. It is widely accepted that retail uses tend to compete with their most comparable competitive facilities. For example, in an area already served by modern convenience stores, the effects of new bespoke stores are likely to fall disproportionately on the existing competing modern stores. Their proportionate impact on smaller and local independent retailers, for example, may be less. Likewise, a proposal for a 'main food shop' supermarket is also less likely to compete with smaller 'top-up' convenience stores and corner shops.

7.6.16 These accepted patterns suggest that the proposed development will compete predominantly on a 'like for like basis' with existing LAD stores further afield in competing centres, which are considered to be drawing significant levels of trade from Lampeter based residents (given the



absence of local choice and competition). By their nature these existing stores are more commonly accommodated in **out of centre** locations.

Trading Effects

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

- The change in turnover of centres in the period 2024-2029 following the development of the proposal; and
- The impact of the proposal on the calculated 2029 turnover of centres.

7.6.18 The key changes following the development of the proposal between 2024-29 is that there will be a diversion of trade and consequential decreases in turnover achieved at centres within the catchment within the period to 2029. However, Table 9 highlights that the proposed development is anticipated to predominantly “clawback” PCA based trade currently lost to existing LAD stores in e.g. Carmarthen and Aberystwyth and Cardigan. The delivery of a local LAD alternative will counteract this unsustainable shopping pattern and increase Cwmann/Lampeter’s self-containment. It will reduce mileage and air pollution. This is a manifestly positive impact.

7.6.19 Table 9 at Appendix D demonstrate the effects of the proposed foodstore is anticipated to be predominantly felt by large and/or comparably scaled foodstores which typically lie **out of centre** and are a) not protected in retail terms and b) well equipped to absorb the trading effect.

7.6.20 It should also be recalled that PCA comparison expenditure will grow in the period 2024 to 2029 which will help offset or mitigate the impact arising from trade diversion to the proposed foodstore over the same period.

7.6.21 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.

7.7 Summary

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

7.7.2 The proposed development will introduce local ‘LAD’ provision to Cwmann/Lampeter, to the benefit of local consumers. In respect to policy SP8 of the LDP there is no evidence to indicate the proposal would either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of town, district, local or neighbourhood centres.



8.0 Other Principal Planning Considerations

8.1 Introduction

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

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

- Principle of Development
- Design, Appearance & Soft Landscaping
- Flood Risk and Drainage
- Landscape & Visual Impact
- Biodiversity
- Transport
- Residential Amenity
- Economic Benefit
- Sustainability

8.2 Principle of Development

8.2.1 PPW 12 recognises that retail and commercial centres are the focal point for shopping, leisure and tourism, local services and business/employment opportunities. This 'town centres first' approach ensures, through policy and decision making, that retail and commercial centres should be the first choice location in assessing the most appropriate places for a wide variety of developments. The co-location of these uses and their high levels of accessibility by a range of transport options make them sustainable locations. Policy SP8 of the LDP confirms that proposals will be permitted where they maintain and enhance the existing retail provision within the County and protect and promote the viability and vitality of the defined retail centres.

8.2.2 The site is located in a semi-rural location on the border between Carmarthen and Ceredigion, to the south of Lampeter and to the west of the urban settlement of Cwmann. Though the site is not allocated for development within the Carmarthenshire LDP, it is directly adjacent to the settlement boundary and has a 'relationship' to the surrounding built form. Cwmann itself is a small community within the northern boundary area of the County and is recognised as a Sustainable Community under Policy SP3 of the LDP with its key service settlement identified as being Lampeter situated to the north within the county of Ceredigion.



- 8.2.3 In terms of retail development, Policy RT1 of the LDP sets out the retail hierarchy for the County and whilst Cwmann is not identified as a growth area, service centre nor local service centre, it is in close proximity to Lampeter, which is identified as an Urban Service Centre within the current Ceredigion LDP 2013. The proposed Lidl is intended to serve the Cwmann and Lampeter catchment area within which it is situated. The proposals do not seek to detract from the existing retail provision within the area but, rather, complement it by providing much needed local access to the LAD retail format at a time of an acknowledged cost of living crisis. This would reduce the need to travel further afield and thereby reduce vehicle emissions at a time when Carmarthenshire has declared a climate emergency in February 2019.
- 8.2.4 In addition, the site benefits from an existing partially implemented planning permission for a service station including neighbourhood retail store and further benefits from planning permission for a 5 no. trade counter units. The ability to build retail development on part of the site without any further permission represents a strong fall-back position and establishes the acceptability of retail development in this location.
- 8.2.5 Notwithstanding the above fallback position and the proposed foodstore falling below the local policy threshold for requiring a retail impact assessment, the application is supported by a need, sequential impact and impact (including health check) assessment provided in Sections 5, 6, 7, and 8 of this report. As set out in the preceding sections a quantitative and qualitative need for the development is demonstrated. Cwmann and Lampeter are both physically constrained settlements; the sequential assessment demonstrates the site is the most sequentially preferable to accommodate the development. Impacts can be both positive and negative. Here, the proposed development will introduce local a materially different 'LAD' retail format locally, to the direct benefit of local shoppers. This is a manifestly positive impact. In respect of adverse trading effects, the impact assessment finds this will be predominantly felt by existing out of centre LAD stores which are not protected in retail terms and well equipped to absorb the effects. There is no evidence to indicate the proposal would give rise to a significantly adverse impact on the trade, turnover, vitality and viability of town centres.
- 8.2.6 The proposals will bring an otherwise vacant and underused parcel of previously developed land back into use, through an appropriately scaled and sited development, with no wider impact on local landscape and/or heritage assets. In conclusion, the principle for redeveloping the site for retail use is firmly established.



8.3 Design, Appearance and Soft Landscaping

- 8.3.1 The application is supported by a Design & Access Statement (HTC Architects) and Landscape Scheme (Corscadden Associates).
- 8.3.2 Lidl acknowledges the importance placed on good design in planning policy at all levels, with this in mind the proposed store has been designed to respond appropriately to the size of the site and its surrounding context.
- 8.3.3 The single storey, development sits low on the site and in the wider landscape. It incorporates high quality design, materials and a landscaping scheme that has been demonstrated to work effectively throughout the country, whilst incorporating aspects of this specific site to ensure the development is sensitive to its surroundings including the use of local and natural materials where possible. For example, the use of locally sourced stone walling.
- 8.3.4 Existing trees and hedgerows have been retained in situ. Additional planting, along the perimeter of the site and within the field to the west of the proposed foodstore.
- 8.3.5 Details of the proposed landscaping are outlined on the Landscape Scheme and Tree Survey and Arboricultural Impact Assessment accompanying the application.
- 8.3.6 In light of the careful and considered design and construction proposed at the site it is considered that the proposal accords with Policy GP1 and EQ1 of the LDP.

8.4 Flood Risk and Drainage

- 8.4.1 Any planning decision at the site must be based on a detailed understanding of flood risk. The flood risks and consequences of development must be fully understood and capable of being acceptably managed over the lifetime of the development.
- 8.4.2 The applicant has commissioned a technical report by Lucion Delta Simons to assess the flood risk of the proposed development. The findings allow the risks associated with the site to be fully understood. They also inform a judgement on whether or not the flood risk is capable of being acceptably managed over the lifetime of the development.
- 8.4.3 The site is located within Zone C2 which is defined as areas of the floodplain without significant flood defence infrastructure. When consulting the Flood Map for Planning the majority of the Site is situated within Flood Zone 3 which is defined as land that has a high probability of flooding without defences. The southern extents of the Site are located within Flood Zone 2 and Flood Zone 1, both of which have a moderate and low probability of flooding respectively.
- 8.4.4 In summary, the majority of the site has a high probability of flooding; thus the risk of fluvial flooding to the majority of the site is high. However, in mitigation the proposed design of the foodstore means the risk of flooding and ingress is considered low. Moreover the assessment finds the risk across the site can be managed effectively by adopting a flood response plan and



signing up for local flood warnings. Given the inundation rate is above 13 hours for most events there is sufficient time to evacuate the site prior to inundation.

8.4.5 To mitigate fluvial flood risk the following is proposed:

- Set finished floor levels above the design flood level (1% AEP + CC), with the front elevations of the foodstore raised on stilts to allow free movement of flood waters.
- Complete site-specific hydraulic modelling to ensure that the risk off site is not exacerbated by providing flood compensatory storage where necessary.
- Site management to register to Floodline flood alerts and warnings to receive updates on flood events.
- Implement an appropriate Site management plan inclusive of a flood response plan, which recognises the residual risks and details what action is to be taken by staff in the event of a flood to put Site users in a place of safety.
- Include for an enhanced surface water drainage maintenance programme to ensure the hydraulic performance of the system remains fully functional particularly after a flood event.
- Appropriate signage within the car park highlighting the risks of flooding.

8.4.6 The assessment finds the site is at low risk of surface water flooding. However the proposed development would lead to an increase in hardstanding area through the construction of the store and associated car park etc. As a result, the rate of surface water runoff generated would increase without mitigation. In order to manage this, a Drainage Strategy has been developed.

8.4.7 The aim of the strategy is to provide a design which will avoid, reduce, and delay the discharge of surface water flows. The drainage strategy for the site is proposed to discharge surface water into the ordinary watercourse which forms the western boundary of the site at the 1 in 1 year greenfield runoff rate of 2.3 l/s. Attenuation will also be provided on site to accommodate storm events up to the design event (1 in 100 years plus 40 % climate change), into public sewers and watercourses. This will mitigate the effect of increasing the site's impermeable drained area and ensure that flood Risk on and off-Site is not exacerbated as a result of the development.

8.4.8 The proposed development is considered to accord with LDP Policy EP1 and EP3 in respect of flood risk and ensuring adequately addressing sustainable water management.

8.4.9 In terms of sustainable urban drainage, the Drainage Strategy concludes that the most appropriate approach is use of pond, basin or swale as an above ground attenuation feature. As such a detention basin has been proposed.

8.4.10 With regard exceedance routes, the Drainage Strategy concludes that the proposed surface water scheme allows for an exceedance route away from the access and egress road and



towards the external landscaped areas and parking areas. Outfall manholes are also to be fitted with high level overflows to mitigate against the risk of surface water emerging onto the surface.

- 8.4.11 The Drainage Strategy concludes that there are no foul sewers within the vicinity of the site are identified within the utility survey plans. As such, foul flows from the site will pass through a package treatment plant, prior to discharge into the receiving watercourse bordering to the west of the site. A pump will be required to make the connection into the watercourse. A plan illustrating this is located within the drainage drawing, Appendix E of the Drainage Strategy.

8.5 Landscape and Visual Impact

- 8.5.1 It is acknowledged that the site is located within the Special Landscape Area of the Teifi Valley where proposals, through their design, appearance and landscape schemes must enhance or improve the area in line with Policy EQ6 of the LDP.
- 8.5.2 Corscadden Associates has prepared a Landscape and Visual Impact Assessment of the proposed development which accompanies the application. It provides an assessment of the effects of the proposed development, on the landscape of the site and its context.
- 8.5.3 In summary, the study confirms that the landscape quality of the existing site is poor with no trees at all and a single, overgrown western hedgerows with off-site one ash with moderate ash dieback. A post and rail fence forms the south and eastern boundary, and the north boundary is a post and wire fence. The Site is fragmented with internal fences and part of the Site is pasture and the rest a location for a burger van and parking for customer lorries, vans and cars.
- 8.5.4 The LVIA notes that the proposed landscape endeavours to have an open feel across the carpark with grass areas and with lines of trees and native hedgerows on boundaries and ornamental planting limited to vehicle and pedestrian access points and the rear store elevation. These together with meadow field area in the previous pasture is to replicate a flood plain like approach to the landscape layout around the store and a carpark and in the meadow field. This landscape approach also ties in with improving the ecological corridors and ecological diversity which is limited and low in the existing site.
- 8.5.5 In terms of visual impact, the LVIA confirms that the landscape proposals should adequately address moderate, moderate minor views and one long distance view with the required mitigation in summer and winter. The close-up views of the site area from the A482 and A485 have a major moderate impact which cannot be addressed by landscape planting proposals and require mitigation from the building design and selection of materials – neutral tone and stone facing materials to elevations.
- 8.5.6 The LVIA concludes that whilst there would inevitably be some adverse landscape and visual effects at the outset, it is judged that the effects of the proposed development and the consequential effects would be localised and provide an improvement to the existing site's limited landscape and ecological quality.



8.5.7 In addition, both landscape and visual matter effects arising during the construction phase would not lead to any permanent harm as the construction phase is transitory in nature and over a short period.

8.5.8 As such it is considered that the proposed development would not give rise to an unacceptable impact on the countryside in accordance with LDP Policy EQ6 and GP1. Further details can be found in the accompanying Landscape and Visual Impact Assessment.

8.6 Biodiversity

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

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

8.6.3 The report concluded the following:

- The report identifies that there are no designated sites within the site but there two within 2km of the site.
- The Modified Grassland, Mixed Scrub and Other Standing Water which are present are considered to be of low value. Developed Land; Sealed Surface is also present which is considered to be of negligible value.
- One waterbody is present onsite but is considered to be unsuitable for breeding GCN. Grassland and scrub habitat onsite provide suitable terrestrial habitat. Two additional ponds were identified within 500m of the Site with moderate connectivity to the Site.
- The site is considered to be of low value to bat species, locally common bird species, badgers and reptiles.
- The site provides negligible suitability habitat, however the river corridor to the north has good opportunity for foraging, commuting and breeding otter. The Site is considered to be of negligible value to the species.
- The site offers suitability for hedgehog and common toad, no evidence was found during the walkover survey.
- Measures to mitigate for impacts have been set out along with recommendations for enhancement of the site's ecological value. The recommendations made include:
- eDNA survey of 2 no. ponds within 500m to determine presence/absence of GCN.



- Construction Ecological Management Plan (CEcMP) including pre-construction check of riparian corridor within 150m of the Site to check for otter resting places.
- A range of good practice avoidance, mitigation and compensation measures are recommended to address ecological impacts and reduce the likelihood of legal offences.

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

8.6.5 A Shadow Habitat Regulations Assessment is being undertaken by Biodiverse Consulting. The primary purpose of this is to assess whether the proposed development will lead to an increase in phosphate levels which could adversely affect the River Teifi SAC.

8.7 Transport

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

8.7.2 The report concludes that a review of the nearby Personal Injury Accident Data has revealed that there is no existing highway safety issues.

8.7.3 Following the review of the accessibility options by different modes of transport, the TA concludes that the site has good levels of accessibility and is also well connected to the adjacent highway network allowing it to maximise the custom it attracts from existing pass-by traffic.

8.7.4 To assess the suitability of the proposed parking provision on site, a parking accumulation exercise has been undertaken by the SCP based upon the forecast trip generation associated with the new development. The assessment has concluded that the proposed parking provision on site has been demonstrated to be sufficient to meet the forecast demand of the proposed development.

8.7.5 The proposed means of access into the application site has been tested using Junctions 9 and the results have confirmed (as identified in the TA) that it provides more than adequate levels of service for the forecast turning movements in and out of Lidl at peak times for both the store and the local highway network.

8.7.6 In terms of impact off-site, the TA has concluded that the impact of the development at nearby junctions has been found to be de minimis. All of the junctions that have been subject to capacity assessment have been found to operate well within capacity in the future scenarios that include



Lidl development traffic within close proximity to the site that may be exacerbated by the proposed development.

8.7.7 A Travel Plan is submitted in support of the application and this will ensure the proposed development provides opportunities for sustainable modes of transport.

8.7.8 Accordingly, the submitted TA demonstrates that the proposed development is fully accords with Policy TR1 and TR2 of the LDP, providing a development that is safe and effective, sustainable with access to public transport and cycle parking, and with an appropriate level of parking.

8.8 Residential Amenity

8.8.1 Whilst the proposals are located near to residential properties, there are not opening or windows along the southern elevation so there is no risk of overlooking.

8.8.2 With regard to noise, Inacoustic were commissioned to assess the impact of potential noise arising from a proposed development to understand potential noise effects and how these may be mitigated. Noise measurements have been undertaken at the site and a subsequent 3-dimensional noise modelling exercise carried out.

8.8.3 Noise measurements were undertaken at locations representative of the closest noise-sensitive receptors in the vicinity of the site, for both daytime and night-time periods.

8.8.4 The Noise Assessment concludes that identifies that noise from vehicle deliveries is unlikely to significantly increase noise levels at the closest sensitive dwellings and as such, will result in no worse than a barely perceptible, minor impact. The assessment also identifies that noise from customer vehicles in the car park is unlikely to significantly increase noise levels at the closest sensitive dwellings and as such, will result in an imperceptible change and negligible impact.

8.8.5 The report identifies that the presence of a delivery to the store will comprise a “low impact, during the daytime and evening periods, but that a “significant adverse impact” may occur during the night-time and early morning periods.

8.8.6 The noise assessment concludes that the potential noise impacts associated with the proposed development can be adequately controlled by appropriate engineering, design and planning controls, and that noise should therefore not be considered a material constraint to the approval of planning permission for the development as described in this report.

8.8.7 The proposed external lighting layout for the scheme is considered appropriate and will be positioned to avoid any significant light spill onto neighbouring properties.



8.9 Economic Benefit

- 8.9.1 The construction phase will bring employment opportunities. Workers employed in construction and related fields spend their earnings locally, benefiting local businesses and encouraging economic circulation. At the operational phase the proposed foodstore element will provide c. 40 direct, full time equivalent (FTE) jobs from e.g. store assistants and cleaners to managers etc. These job opportunities will be accessible on foot or bicycle to the surrounding resident population. Lidl currently pay a retail industry leading wage of £12.40/hour, increasing to £13.35 hour for long service.
- 8.9.2 Local shoppers are currently at an economic disadvantage insofar as they do not have easy access to the 'limited assortment discount' retail format and offer provided by Lidl. The development will assist with increasing the local availability of affordable food which is an important consideration in the context of the cost-of-living challenges faced by local consumers in the short and medium term.

8.10 Sustainability

- 8.10.1 Lidl stores are designed to be as environmentally sound as possible. For example, store heating systems are highly efficient condensing boilers which recover waste heat from the combustion process. All heating is regulated by sensors. The canopy of the store is also designed to minimise thermal gain within the building.
- 8.10.2 A system of 180 12 kWp Photo Voltaic panels consisting of 468 PV modules are proposed on the roof of the store to generate on site renewable energy for use in the store.
- 8.10.3 The lighting in the storage and warehouse areas is controlled by movement sensors so that lights only turn on when the space is in use. The sales area uses full lighting during trading hours but cuts back to one third lighting before and after trading hours to allow for re-stocking of the store. A Building Management System and LUX sensors control the lighting. This means that lights are only on when necessary, during dark periods and ensures that lights do not remain on later than 2 hours after the store closes.
- 8.10.4 Sustainable techniques are used during the construction and operation of the development wherever practicable, in accordance with Policy SP1 and SP2 of the adopted LDP.

8.11 Summary

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



9.0 Summary and Conclusions

9.1.1 This Planning and Retail Statement (PRS) has been prepared by CarneySweeney (CS) on behalf of the applicant, Lidl Great Britain Ltd, in support of a full planning application for the erection of a Class A1 retail foodstore with surface level car parking, landscaping, all associated development at land at A482, Cwmann, Lampeter.

9.1.2 This PRS should be read in conjunction with the Design and Access Statement and other documents and drawings submitted in support of this application.

9.1.3 This PRS has demonstrated that the proposal is in accordance with planning policy at all levels:

- The Quantitative and qualitative need for the proposed development has been demonstrated. Moreover, the application's pre-application consultation process has highlighted the overwhelming support for the proposed development by locals, given the absence of a LAD retail format and the widely recognised need for improved local convenience provision in Cwmann/Lampeter to serve local needs, locally;
- A sequential search has been carried out based on prevailing national guidance and in the context of case law and court decisions. The site is a committed retail site. Allowing for flexibility, it finds no suitable and available sequentially preferable sites to accommodate the proposed development. The sequential test is passed;
- A comprehensive landscape visual impact assessment finds through mitigation the proposed development will not have an unacceptable impact on surrounding landscape;
- The site is accessible by a choice of means of transport. The development will have no unacceptable impact on the local highway network. The development will reduce car journeys and increase settlement self-containment in accordance with LDP policy;
- Health checks of nearby centres within the primary catchment area demonstrate that Lampeter centre and other surrounding centres are vital and viable when assessed against relevant indicators;
- An impact assessment has been carried out in a transparent way, based upon up-to-date data and an assessment of existing shopping patterns. The proposed development will introduce local 'LAD' provision to Cwmann/Lampeter, to the benefit of local consumers.
- The proposals are considered acceptable in all other technical aspects including design, flood risk and drainage, ecology and noise considerations.
- The proposals accordance with planning policy at all levels provides an overall balance of considerations which weigh firmly in favour of approving the proposed development.



9.1.4 It has been demonstrated that the Lidl proposal will deliver a number of major benefits to the areas of Cwmann, Lampeter and the wider rural communities including:

- The provision of a new limited assortment discount foodstore, providing the local community with access to affordable, healthy and fresh produce;
- Reducing vehicle shopping miles, thereby reducing vehicle emissions;
- The provision of major employment and economic benefits including construction and retail jobs;
- Increased retention of expenditure within the areas;
- Bringing a committed retail, but underutilised site, back into use;
- Provision of a high-quality design and development that sits comfortably within the surrounding context;
- Provision of active travel measures; and
- A net benefit in biodiversity through planting.

PAC DRAFT



Appendix A – Site Layout Plan

PAC DRAFT



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

BOUNDARY BASED ON TITLE DEEDS: WA591812

SUBJECT TO LEVELS REVIEW

SUBJECT TO LANDSCAPE ARCHITECT DESIGN

SUBJECT TO TREE SURVEY AND ECOLOGIST REPORT/REVIEW

SUBJECT TO DRAINAGE DESIGN AND REVIEW

SUBJECT TO FLOOD RISK ASSESSMENT

LIDL DESIGN AS PER LATEST STANDARD SPECIFICATION TYPE 1300 JUNE 2024



TOTAL AREA - RED BOUNDARY LINE
14547 SQM / 3.59 ACRES

SURPLUS LAND FOR FLOOD
MITIGATION MEASURES - AS PER
CONSULTANTS DESIGN

Rev	Date	Description	Drawn
C	14/10/2024	SITE PLAN UPDATED TO SUIT NEW LEVELS	BM
B	04/10/2024	Store moved 2m South West. Pedestrian link adjusted to suit new FFL	BM
A	25/09/2024	Vehicle entrance updated as per SCP drawing	BM

htcarchitects
York Place Studio
8 Britannia Street
Leeds
LS1 2DZ
T: (0113) 244 3457
W: www.htcarchitects.co.uk
E: info@htcarchitects.co.uk

client
Lidl GB Ltd.



project
Cwmann, Lampeter

drawing title
Proposed GA Site Plan

date
September 2024

status
Planning

scale
1:500 @ A3

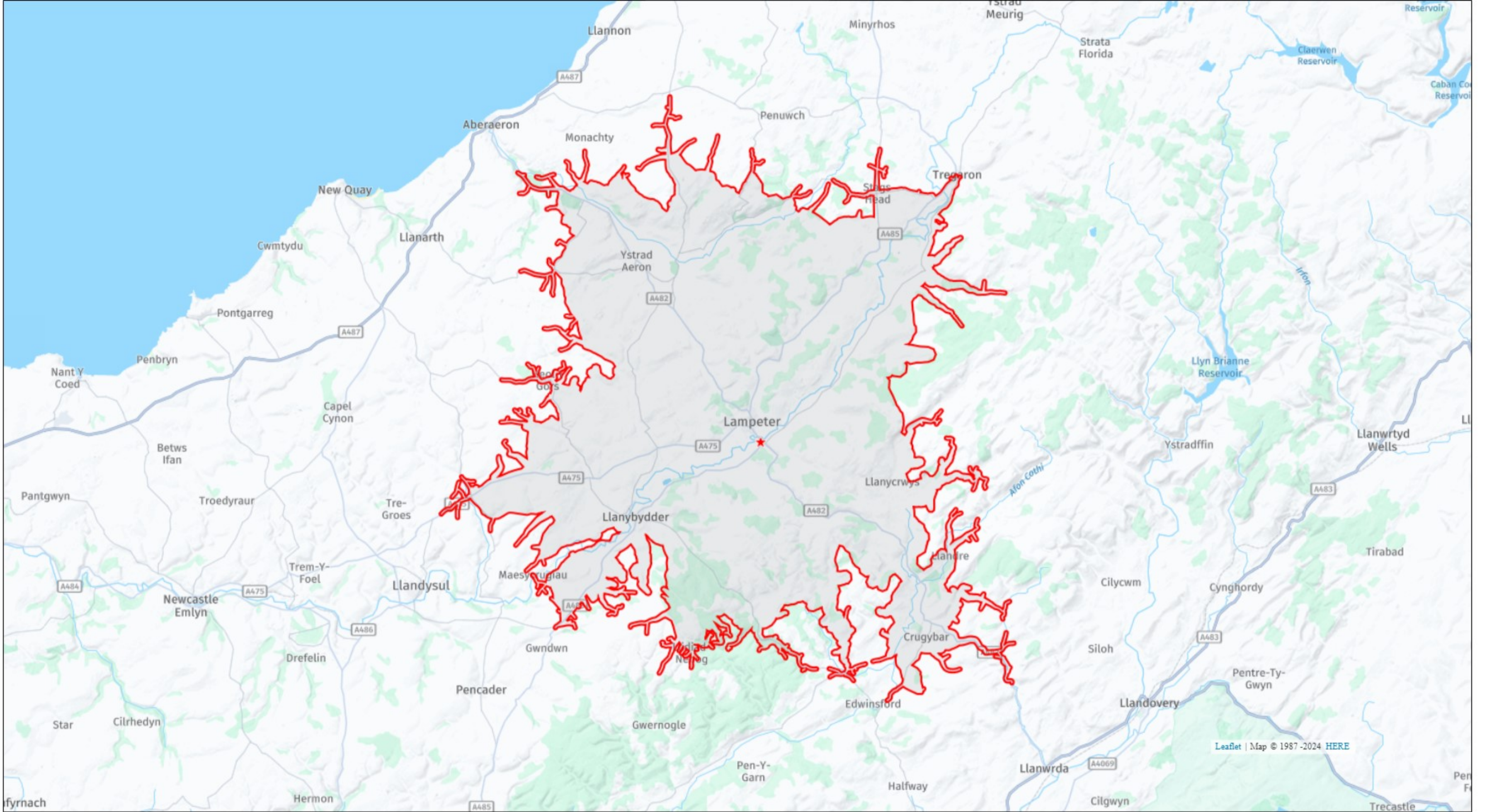
drawn
BM checked -

job no.
3384 dwg no. P411 rev. C

Appendix B – Primary Catchment Area (PCA)

PAC DRAFT





Legend

 Cwmann (20 Minutes)

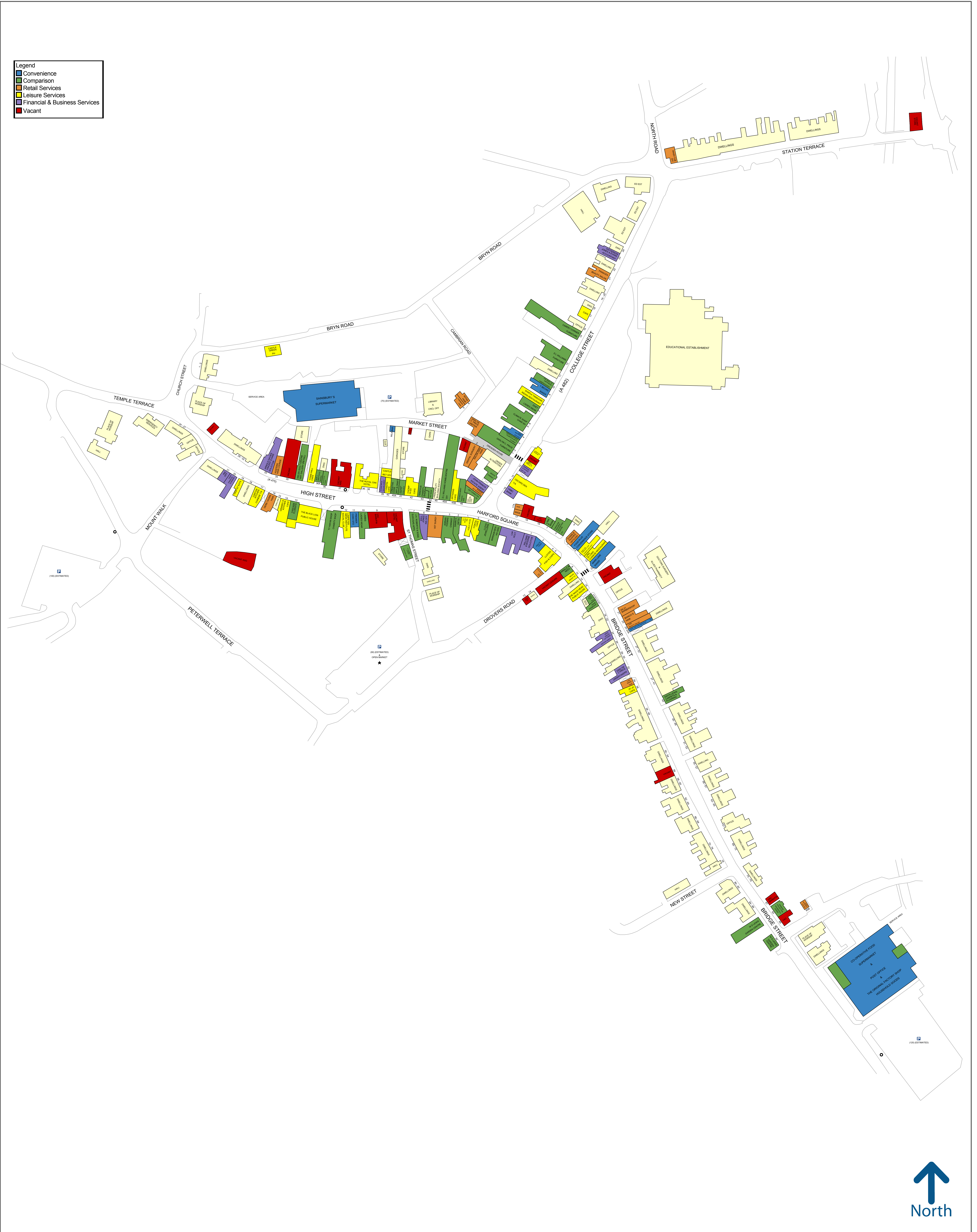
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Leaflet | Map © 1987 - 2024 HERE

Appendix C – Lampeter GOAD Plan

PAC DRAFT





46 metres

Experian Goad Plan Created: 24/10/2024
Created By: Carney Sweeney Ltd



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Appendix D - Statistical tables

PAC DRAFT



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Land at A485 Cwmann, Lampeter

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Table 1: Population

Zone	2024	2025	2026	2027	2028	2029	Change 2024-2029	
							No.	%
	[1]					[2]	[3]	[4]
PCA	14,344	14,345	14,356	14,355	14,348	14,344	-	-
Total	14,344					14,344	-	-

Notes:

Population projections obtained from Experian Location Analyst Report UK 2023 data version

[3] = [2] - [1]

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

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Land at A485 Cwmann, Lampeter

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

Zone	2024	2025	2026	2027	2028	2029
PCA	2,582	2,566	2,556	2,551	2,548	2,546

Notes:

per capita figures sourced from from Experian Location Analyst report data

Excludes SFT in line with Fig 7 of EXRPBN 21 (Feb 2024)

Subsequent years projected forward in accordance with growth rates set out in

App 3 of EXRPBN 21 Feb 2024 - growth in sales volumes (adj. for SFT (sales via stores))

Table 3: Comparison goods expenditure (per capita)(£)

Zone	2024	2025	2026	2027	2028	2029
PCA	2,737	2,770	2,850	2,921	2,985	3,054

Notes:

per capita figures sourced from Experian Location Analyst 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 Feb 2024 - growth in sales volumes (adj. for SFT (sales via stores))

2022 prices

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Land at A485 Cwmann, Lampeter

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Table 4: Total Convenience Goods Expenditure, 2024-2029 (£m)

Zone	2024	2025	2026	2027	2028	2029	Change 2024-2029	
							£m	%
	[1]					[2]	[3]	[4]
PCA	37.0	36.8	36.7	36.6	36.6	36.5	-0.5	-1.4

Notes:

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

[3] = [2] - [1]

[4] = [3]%

Table 5: Total Comparison Goods Expenditure, 2024-2029 (£m)

Zone	2024	2025	2026	2027	2028	2029	Change 2024-2029	
							£m	%
	[1]					[2]	[3]	[4]
PCA	39.3	39.7	40.9	41.9	42.8	43.8	4.6	11.6

Notes:

[1] & [2] Derived by multiplying the population (Table 1) with expenditure per capita per zone (Table 3).

[3] = [2] - [1]

[4] = [3]%

2022 prices

Table 6: Existing convenience store turnovers, 2024

	2024 £m	2029 £m
Primary Catchment Area		
Lampeter TC		
Sainsbury's Market Place	11.4	11.9
Other	1.0	1.1
<i>Lampeter Out of centre</i>		
Coop, Lower Bridge Street	6.0	6.3
Other out of centre	0.2	0.2
Llanbydder Town Centre	0.3	0.3
Beyond PCA		
Aberaeron Town Centre		
Costcutter, Market St, Aberaeron	4.3	4.5
Other town centre	0.5	0.6
<i>Aberaeron Out of Centre</i>	0.4	0.4
New Quay TC		
Costcutter, Uplands Square, New Quay	1.1	1.1
Llandysul Town Centre	2.9	3.1
<i>Llandysul Out of Centre</i>	1.9	2.0
Other Zone 1	2.7	2.8
Aberystwyth Town Centre		
Lidl, Alexandra Road, Rheidol R.P	11.5	12.1
Tesco Express, North Parade, Aberystwyth	2.6	2.7
Tesco Superstore, Park Avenue, Aberystwyth	13.3	13.9
Other town centre	6.1	6.4
<i>Aberystwyth Out of Centre</i>		
Morrisons, Parc y Llyn, Aberystwyth	25.6	26.8
Other out of centre	3.0	3.1
Other Zone 2	4.9	5.1
Carmarthen Town Centre	9.2	9.7
<i>Carmarthen Out of Centre</i>		
Aldi, Stephens Way, Carmarthen	10.6	11.1
Farmfoods, Stephens Way, Pensarn, Carmarthen	1.5	1.5
Morrisons, Parc Pensarn, Carmarthen	8.6	9.0
Tesco Extra, Morfa Lane, Carmarthen	22.0	23.0
Lidl, Friars Park, Carmarthen	8.2	8.6
Other out of centre	3.5	3.6
Other Zone 3	2.3	2.4
Cardigan Town Centre	2.5	2.6
<i>Cardigan Out of Centre</i>		
Aldi, Aberystwyth Road, Cardigan	15.8	16.5
Tesco Superstore, Abersyswyth Road, Cardigan	26.3	27.5
Other out of centre	2.9	3.0
Newcastle Emlyn Town Centre		
Coop, Sycamore Street, Newcastle Emlyn	1.5	1.6
Other town centre	1.0	1.0
<i>Newcastle Emlyn out of centre</i>	2.6	2.8
Other Zone 4 floorspace	2.4	2.5
Zone 5 floorspace	0.1	0.1
Llandello Town Centre	0.5	0.5
<i>Out of Centre</i>		
Aldi, Llandello Rd, Cross Hands	0.5	0.5
Aldi, Station Crescent, Llandrindod Wells	0.5	0.6
Tesco Superstore, Park St, Ammanford	0.6	0.7
Lidl, Cross Hands,	0.3	0.3
Coop, Rhosmaen Street, Llandello	1.6	1.7
Other out of centre	2.3	2.4
Other stores	1.0	1.0

Notes
Sourced from Table 6 of RIA app ref: A211186 (based on 2021 household survey).
Turnovers projected forward to 2024-2029 index linked to 2022 prices

Lidl Great Britain Ltd
Land at A485 Cwmann, Lampeter

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Table 7a: Retail Turnover of Proposed Development

	Gross internal area (sqm)	Total Net Sales (sqm)	Net sales area (sqm)	Trading density (£/sqm)	Turnover 2024 (£m)	Turnover 2029 (£m)	Total Turnover 2029 (inc. inflow) (£m)
	[1]	[2]	[3]	[4]	[5]	[8]	[9]
Lidl Foodstore	TBC	1,334					
<i>convenience</i>			1,067	9,197	9.8	9.9	11.4
<i>comparison</i>			267	4,865	1.3	1.5	1.7
Total					11.1	11.4	13.1

Notes

[2] Net sales area taken from application drawings

[3] assumed 80% net conv sales & 20% comp sales

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

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

[6] [8] benchmark turnover rolled forward t2029 based on assumed f/s efficiency increase (0.2% conv and 2.6% comp p/a) (EXRPBN 21 Figs 4a&b (Feb 2024))

[7] [9] benchmark turnover with 15% allowance for inflow

Table 7b: Retail Turnover - Committed development comparison

	Total GIA sqm	Net sales sqm	Trading Density £/sqm	Turnover 2024 £m
	[1]	[2]	[3]	[4]
permission ref. W/31378	250			
Neighbourhood convenience store		225	11,332	2.5
permission ref. PL/05898	640			
Trade counter units		576	1,608	0.9
Proposed Lidl	1,334			
<i>convenience</i>		1,067	9,197	9.8
<i>comparison</i>		267	4,865	1.3
Total turnover				11.1

Notes

[1] taken from application/permission drawings

[2] assumed 90% or 80% net conv sales & 20% comp sales

[3] Lidl table 7a, pp ref: W/31378

[4]=[2]x[3]/1000000

2022 prices

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Table 8: PCA capacity for additional convenience floorspace to 2029

	2024	2029
[1] Available Convenience Expenditure in PCA (£m)	37.0	36.5
[2] Turnover of existing stores in PCA (£m)	18.9	19.7
[3] PCA derived turnover of proposed development (£m)		9.9
[4] Turnover of Convenience Retail Commitments in PCA (£m)		
[5] Total PCA turnover (£m)	18.9	29.7
[6a] PCA convenience expenditure capacity (£m)	18.2	6.9
[6b] Retained market share of PCA expenditure (%)	51.0	81.2

Notes

[1] taken from table 4

[2] taken from table 6. Projected forward to 2029 on basis that facilities gain from a pro-rata growth in expenditure

[3] taken from table 7a

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

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

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

2022 prices

Table 9: Trading effects of the proposed development, 2024-29

	Turnover 2024				Turnover 2029				Trade Diversion to Proposed				SOLUS				
	Convenience	Comparison	inflow	Total Turnover inc. inflow 2024	Convenience	Comparison	inflow	Total Turnover inc. inflow 2029	Convenience		Comparison		Residual Turnover 2029	Change 2024-29		2029 Impact	
	£m	£m	%	£m	£m	£m	%	£m	%	£m	%	£m	£m	%	£m	%	
	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]				[10]	[11]	[12]	[13]	[14]
Primary Catchment Area																	
Lampeter TC		23.0	15	26.5		25.7	15	29.5			10	0.2	29.4	2.9	11.0	-0.2	-0.6
Sainsbury's Market Place	11.4		15	13.1	11.9		15	13.7	10	1.1			12.6	-0.5	-4.1	-1.1	-8.3
Other	1.0		15	1.2	1.1		15	1.2	1	0.1			1.1	-0.1	-5.2	-0.1	-9.4
Lampeter TC Total	12.4	23.0	15	40.7	13.0	25.7	15	44.5	11	1.3	10	0.2	43.0	2.3	5.7	-1.4	-3.2
<i>Lampeter out of centre</i>																	
Coop, Lower Bridge Street	6.0		15	6.9	6.3		15	7.2	7	0.8	1	0.02	6.4	-0.5	-7.2	-0.8	-11.3
Other out of centre	0.2		15	0.3	0.2		15	0.3					0.3	0.0	4.6		
Beyond PCA																	
Aberaeron TC		6.6	15	7.6		7.4	15	8.5			5	0.1	8.4	0.8	10.5	-0.1	-1.0
Costcutter, Market St, Aberaeron	4.3		15	4.9	4.5		15	5.1	2	0.2			4.9	0.0	0.0	-0.2	-4.4
Other town centre	0.5		15	0.6	0.6		15	0.7					0.7	0.0	4.6		
Aberaeron TC Total	4.8	6.6	15	13.2	5.0	7.4	15	14.3	2	0.2	5	0.1	14.0	0.8	6.3	-0.3	-2.2
Aberaeron out of centre	0.4			0.4	0.4			0.4					0.4	0.02	4.6		
New Quay TC				1.1	1.1			1.1	1	0.1			1.0	-0.1	-5.8	-0.1	-9.9
Costcutter, Uplands Square, New Quay	1.1			1.1	1.1			1.1	1	0.1			1.0	-0.1	-5.8	-0.1	-9.9
Llandysul TC	2.9	5.1		8.0	3.1			3.1	1	0.1	1	0.02	2.9	-5.1	-63.3	-0.1	-4.3
Aberystwyth TC		119.5	12	133.8		133.3	12	149.3			11	0.2	149.1	15.3	11.5	-0.2	-0.1
Lidl, Alexandra Road, Rheidol R.P	11.5		12	12.9	12.1		12	13.5	10	1.1	5	0.1	12.3	-0.6	-4.8	-1.2	-9.1
Tesco Express, North Parade, Aberystwyth	2.6		12	2.9	2.7		12	3.1					3.1	0.1	4.6		
Tesco Superstore, Park Avenue, Aberystwyth	13.3		12	14.9	13.9		12	15.6	3	0.3			15.3	0.3	2.3	-0.3	-2.2
Other town centre	6.1		12	6.9	6.4		12	7.2	1	0.1			7.1	0.2	3.0	-0.1	-1.6
Aberystwyth TC Total	33.6	119.5	12	171.4	35.1	133.3	12	188.7	14	1.6	16	0.3	186.8	15.4	9.0	-1.9	-1.0
<i>Aberystwyth out of centre</i>																	
Morrisons, Parc y Llyn, Aberystwyth	25.6		12	28.7	26.8		12	30.0	3	0.3			29.7	1.0	3.4	-0.3	-1.1
Other out of centre	3.0		12	3.3	3.1		12	3.5					3.5	0.2	4.6		
Carmarthen TC	9.2	158.3	12	187.6	9.7	176.6	12	208.6	5	0.6	5.0	0.1	208.0	20.4	10.9	-0.7	-0.3
<i>Carmarthen out of centre</i>																	
Aldi, Stephens Way, Carmarthen	10.6	94.7	12	106.1		105.7	12	118.4			10.0	0.2	118.2	12.1		-0.2	
Farmfoods, Stephens Way, Pensarn, Carmarthen	1.5		12	1.9	1.1		12	12.5	10	1.1	2	0.0	11.3	-0.6	-5.2	-1.2	-9.4
Morrisons, Parc Pensarn, Carmarthen	8.6		12	9.6	9.0		12	10.0	4	0.5			9.6	0.0	-0.1	-0.5	-4.5
Tesco Extra, Morfa Lane, Carmarthen	22.0		12	24.6	23.0		12	25.8	4	0.5			25.3	0.7	2.8	-0.5	-1.8
Lidl, Friars Park, Carmarthen	8.2		12	9.2	8.6		12	9.6	9	1.0	5	0.1	8.5	-0.7	-7.5	-1.1	-11.6
Other out of centre	3.5		12	3.9	3.6		12	4.0					4.0	0.2	4.6		
Newcastle Emlyn Town Centre				1.7	1.6			1.7	1	0.11			1.6	0.0	-2.2	-0.1	-6.5
Coop, Sycamore Street, Newcastle Emlyn	1.5		12	1.7	1.6		12	1.7	1	0.11			1.6	0.0	-2.2	-0.1	-6.5
Other town centre	1.0		12	1.1	1.0		12	1.1					1.1	0.0	4.6		
Newcastle Emlyn Town Centre	2.4		12	2.7	2.6		12	2.9	1	0.11			2.8	0.0	0.5	-0.1	-4.0
<i>Newcastle Emlyn out of centre</i>																	
	2.6		15	3.0	2.8			2.8	1	0.1			2.7	-0.4	-12.8	-0.1	-4.1
Other Out of Centre																	
Aldi, Llandeilo Rd, Cross Hands, Llanelli	0.5		12	0.6	0.5		12	0.6	4	0.5	3	0.1	0.1	-0.5	-87.4	-0.5	-88.0
Aldi, Station Crescent, Llandrindod Wells	0.5		12	0.6	0.6		12	0.6					0.6	0.0	4.6		
Tesco Superstore, park St, Ammanford	0.6		12	0.7	0.7		12	0.8					0.8	0.0	4.6		
Lidl, Cross Hands, Llanelli	0.3		12	0.3	0.3		12	0.4	5	0.6	5	0.1	-0.3	-0.6	-184.7	-0.7	-181.0
Coop, Rhosmaen Street, Llandeilo	1.6		12	1.8	1.7		12	1.9	2	0.2	2	0	1.6	-0.2	-9.9	-0.3	-13.9
Other									2	0.2	4	0.1	-0.3	-0.3			
Inflow									15	1.7	15	0.3	-2.0	-2.0			
Total									100	11.4	100	1.7					

Notes

- [1] [2] taken from table 6
- [3] allowance for inflow
- [4] = [1]+[2]+[3]
- [5] [6] taken from table 6
- [7] allowance for inflow
- [8] = [5]+[6]+[7]
- [9] CS assessment, allowing for f/s efficiency growth (Table 7a)
- [10]=[8]-[9]
- [11] = [10] - [4]
- [12] = [10]-[4]/[4]*100
- [13] = [10]-[8]
- [14] = [10]-[8]/[8]*100