

Lidl Great Britain Ltd

# **Planning & Retail Statement**

Great North Road, Milford Haven

by CarneySweeney

April 2024



**CARNEYSWEENEY**  
PLANNING

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<b>Issue Date:</b>	25/03/2024	Revision Number:	C



## 1.0 INTRODUCTION

### 1.1 Background

1.1.1 This Planning and Retail Statement (PRS) has been prepared by CarneySweeney on behalf of Lidl Great Britain Ltd ('Lidl') in support of a full planning application for a redeveloped Lidl foodstore on land at Great North Road, Milford Haven.

1.1.2 Lidl is currently represented in Milford Haven at its existing store at Great North Road. The existing Lidl store is a small, and of an early generation, format. Owing to Lidl's well established and growing local customer base, Lidl has outgrown its existing premises which no longer meets modern shopper requirements; a larger store is necessary to display Lidl's modern-day product lines and safely cater to local customer demand. The constrained nature of the existing plot means an extension to the existing store is not feasible. On this basis it is proposed to demolish the existing Lidl store and adjoining properties to the north and develop a new Lidl store on an expanded site at Great North Road, Milford Haven, which includes the existing Lidl site and the adjacent Enterprise Rent-a-Car unit and 3 no. residential properties at 61, 61A & 61B Great North Road. The application site is within Lidl's sole ownership.

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

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

- Design and Access Statement;
- Preliminary Ecological Appraisal;
- Arboricultural Report;
- Green Infrastructure Statement;
- Planting Methodology & Landscape Management Plan
- Transport Statement;
- Noise Assessment; and
- Flood Consequences Assessment & Drainage Strategy

### 1.2 Structure of the Report

1.2.1 The remainder of the report is structured as follows:

- Section 2 provides a detailed description of the site and the surroundings.
- Section 3 describes the application proposals including Lidl's Business Model.
- Section 4 provides a summary of the relevant development plan policies.



- Section 5 sets out an assessment of existing retail provision;
- Section 6 considers the need for the proposed development;
- Section 7 considers the application of the sequential test;
- Section 8 provides an assessment of retail impact;
- Section 9 outlines non-retail planning considerations
- Section 10 presents our overall conclusions.



## 2.0 THE SITE AND CONTEXT

### 2.1 The Application Site

2.1.1 The application site is located off Great North Road/A4076 in Milford Haven, approximately 0.5km northeast of Milford Haven Town Centre. The application site extends to approximately 0.7ha and currently comprises the existing Lidl store, including customer car park, in the southern part of the site and a series of adjoining properties to the north of the store. These include an Enterprise Rent-A-Car premises and 2no. dwellings at Great North Road. The application site is accessed directly from Great North Road/A4076, which runs parallel to the site's eastern border. See **Figure 1** below.



Figure 1: Site Location Plan (outlined in red)

2.1.2 The site's surroundings are predominantly residential in character. Residential dwellings adjoin the site's borders at Vaynor Road (to the west & north), Great North Road (to the east) and Greville Road (to the south). A petrol filling station lies immediately adjacent to the south.

2.1.3 The site lies within Flood Zone A and is at little to no risk of flooding. 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.



## 2.2 Planning History

2.2.1 The planning history for the site is set out in Table 2.1 below.

Table 2.1: Planning History

Application Ref	Description of Proposal	Decision
<b>Lidl Foodstore, Great North Road</b>		
06/0808/PA	Proposed store extension and associated alterations.	Approved 16/01/07
07/0888/AD	Erection of a sign	Approved 07/11/07
08/0111/AD	Erection of an illuminated sign	Approved 20/06/08
11/1050/AD	Erection of 2 non-illuminated hoarding signs	Approved 21/03/12
16/0512/AD	Replacement of existing flagpole with 7.5m high totem sign	Approved 14/10/16
<b>61 Great North Road</b>		
97/0938/PA	Change of use from redundant shop to domestic garage	Approved 27/04/98
03/0941/PA	Photographer studio (in retrospect)	Approved 11/02/04
05/0835/PA	Garage adj. to 61 COU to vehicle rental offices & forecourt	Approved 25/11/05
12/0176/PA	Conversion of redundant shop to dwelling	Approved 19/07/12



## 3.0 THE PROPOSED DEVELOPMENT

### 3.1 The Application Proposals

3.1.1 The proposals are shown on the Proposed Site Layout Plan and comprise: -

- The demolition of the existing Lidl store and adjoining properties to the north (Enterprise Rent-A-Car unit and 61, 61A & 61B North Road)
- Erection of a new Lidl food store of 1,955 sqm gross internal area with a net sales area of 1,330 sqm;
- 94 car parking spaces including 6 accessible bays, 9 parent and child bays, and 2 bays with rapid electric vehicle (EV) charge points;
- Vehicular access taken from Great North Road; and
- Hard and soft landscaping.

#### Siting and Appearance

3.1.2 The proposed food store will be located in the southern part of the site. It will be single storey with a mono-pitch roof rising on its northern elevation. The customer entrance will be located at the north-east corner of the building. The majority of the eastern elevation facing onto Great North Road is proposed to be glazed, with the glazing wrapping around to the northern elevation where the customer entrance is located. A canopy is proposed above the glazing and provides shelter to those entering and leaving the store, as well as cover to the trolley storage area which is located adjacent to the store entrance. The canopy is also designed to manage thermal gain within the building.

3.1.3 New landscaping perimeter landscaping is proposed to frame the development within its wider setting. Pedestrian

#### Access

3.1.4 A repositioned access will be created from Great North Road to serve the proposed foodstore. Pedestrian access and linkages to the store entrance are proposed from the site's eastern border, via a zebra crossing. The existing pedestrian access via the alleyway off Greville Road will be blocked up.

#### Deliveries and Servicing

3.1.5 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 will remain, typically, no more than 1 to 2 per day. These delivery vehicles also take waste back to the regional distribution centre which serves the store, helping to reduce the number of traffic movements at Lidl's sites and reducing emissions as a consequence.





## 3.2 Lidl's Operational Model

3.2.1 Lidl is now exceptionally well established in the UK with the Company operating in excess of 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.

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

*“carry a limited range of grocery products and base their retail offer on selling those products at very competitive prices. The three major LADs in the UK are Aldi, Lidl and Netto. Each ... carries in the region of 1,000 to 1,400 product lines in stores ranging from 500m<sup>2</sup> to 1,400m<sup>2</sup> (stores of a similar size operated by a large grocery retailer generally carry about 5,000 products). Aldi, in large part, carries only own label goods while both Lidl and Netto carry larger volumes of branded products”.*

3.2.3 Whilst this report is over ten years old, its description of the LAD business model remains sound, albeit Netto no longer trades in the UK; the size of Lidl and Aldi stores has increased to some extent; and the number of product lines sold has increased to circa 1,600 to 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.

3.2.4 The Commission, Inspectors and Secretary of State have expressly recognised that LADs offer particular benefits of quality and value. Lidl sells a limited number of product lines, but all of its business practices are aimed at driving down costs so that it can provide exceptional value for money across the whole of its product range. 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.

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

- tremendous buying power as a result of the scale of its operations across Europe
- a concentration on own brands (now about 80% of its product range) which avoids passing on the cost of brand name marketing to the consumer;



- its decision to stock a much more limited product range than others, concentrating on goods that form a very high proportion of the weekly food shopping needs of most households;
  - operating systems that reduce operational costs; and
  - simple product display and stock handling procedures.
- 3.2.6 The ability to offer a consistent range of high-quality goods at competitive prices enables Lidl to distinguish itself from other operators that may be perceived as operating similar business models. The whole of the Lidl product range delivers value whereas the major grocers only stock own brand and 'value' lines amongst their branded and premium products.
- 3.2.7 Lidl does not stock convenience goods such as tobacco, or individual confectionary items and stocks limited pre-packed fish and meat and individual fruit and vegetable products. Lidl also does not provide services such as a post office, pharmacy, delicatessen, financial products or other in-house facilities. The result is that there is limited overlap with conventional supermarkets.
- 3.2.8 Lidl stores offer a limited range of non-food items which typically occupy about 20% of the sales area. These items tend to be one-off specials offered on the basis of 'when it's gone, it's gone', with the range changing on a weekly basis. There is no standard or constant comparison goods range offered in store and the special items are wide ranging including anything from sports equipment to electrical items.
- 3.2.9 On the issue of sustainability backing British suppliers continues to be at the forefront of Lidl's plans with total investment in British food and farming businesses to hit £17bn by 2025.
- 3.2.10 Since 2016, Lidl has reduced its food waste by almost half (43%). This means it is well on track to hit its 50% reduction target by 2030. Providing more meals to charities - including over 6 million in 2022 which surpasses the discounter's target - has helped reach this milestone. In 2022, Lidl also prevented nearly 9,000 tonnes of food waste through the sale of 1.7 million 'Too Good to Waste' boxes. Reducing other forms of waste has also been a key priority and 95% of Lidl's own-brand packaging is now recyclable, reusable, renewable or refillable.
- 3.2.11 Overall, Lidl has cut the amount of plastic packaging across its own-brand ranges by 29% since 2017 - with its sights set on achieving a 40% reduction by 2025. Through its partnership with Prevented Ocean Plastic, the discounter has also stopped the equivalent of 15 million plastic bottles from entering the ocean.
- 3.2.12 With over 90% of Lidl's carbon emissions coming from its supply chain and use of its products, Lidl is also working closely with suppliers on carbon reduction projects. The discounter has partnered with The Rivers Trust and is funding three water catchment projects (increasing to nine by 2025) to mitigate risks in the supply chain.



- 3.2.13 Meanwhile, 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.
- 3.2.14 All of these measures support Lidl's sustainability goals and its commitment to helping customers in their day-to-day lives; that's why Lidl also led the way in pledging to halve the environmental impact of its customers' shopping baskets by 2030, through the WWF's Retailers' Commitment for Nature.
- 3.2.15 Principles of sustainability are engrained in Lidl's operation from the efficient construction and standardised fit-out elements enabling rapid store construction, to energy saving measures including energy efficient building materials, low energy consumption lighting, motion detectors and automatic 'power down' lighting, electricity and heating in the evenings.
- 3.2.16 Staffing levels have yet to be finalised, however based on existing Lidl's elsewhere the proposed store is likely to provide up to 40 FTE job opportunities. Lidl always seek to source labour locally and provide management opportunities for staff, the company's philosophy being to provide all their employees with opportunities for developing and progressing their careers with the company, with the longstanding corporate strategy being to promote from within the business.

### 3.3 Pre-application Consultation

- 3.3.1 The application submission follows discussions with Pembrokeshire County Council Officers, initiated in October 2023 whereby the draft proposals were submitted to the LPA for comment.
- 3.3.2 A formal pre-application consultation response was received from the LPA on 22<sup>nd</sup> November 2023 which provided advice which included the following points:
- The Environment (Wales) Act 2016 imposes a duty on the LPA to maintain and enhance biodiversity. Consideration should be given to the preparation of a Biodiversity Enhancement, Implementation & Management Strategy to accompany any application submission.
  - The site falls within the built-up fabric of Milford Haven, but outside of the Town Centre. A Retail Impact Assessment (RIA) needs to be submitted in support of the proposed development to robustly demonstrate that the proposed development, given its size and location, will not undermine the vitality and viability of Milford Haven's town centre.
  - The proposed layout will lead to servicing arrangements between the store and the rear gardens of the housing on Vaynor Road, there also appears to be a M&E plant compound situated in close proximity to this boundary. Further investigation is recommended in order to safeguard residential amenity.



- The proposed layout will also lead to the provision of car parking to the rear of the houses in Vaynor Road. Boundary treatment will need very careful consideration with a view to minimising potential adverse impacts from noise, light and general disturbance. Security will also be an important consideration as the boundaries of rear gardens will be 'exposed' to an area with public access.
- The Council's adopted SPG Parking Standards sets maximum parking standards for new provision. The proposal will provide car parking provision considerably in excess of the maximum suggested for a retail development of this scale in this location. A particularly robust justification will be required for the proposed level of provision. The draft layout does not appear to make any provision for 'drop off – pick up' arrangements or cycle parking, which should be accommodated. It is worth noting here that the proposal includes 10 Sheffield cycle stands allowing parking for up to 20 bicycles.



## 4.0 PLANNING POLICY CONTEXT

### 4.1 The Development Plan

- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.1.2 The development plan for this site is the Pembrokeshire Local Development Plan adopted 28<sup>th</sup> February 2013.

### 4.2 Pembrokeshire Local Development Plan

- 4.2.1 The Pembrokeshire LDP was adopted in February 2013 and covers the period to 2021. It forms part of the statutory development plan alongside Future Wales: The National Plan 2040.
- 4.2.2 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'. The policies of relevance to the proposed development are now discussed in further detail below.
- 4.2.3 **Policy SP 1 Sustainable Development** indicates that all development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised.
- 4.2.4 **Policy SP 4 Promoting Retail Development** identifies Milford Haven as a town centre within the retail hierarchy. All new retail and leisure development should be consistent in scale and nature with the size and character of the Centre and its role in the retail hierarchy. Proposals which undermine the retail hierarchy will not be permitted.
- 4.2.5 **Policy SP 12 The Settlement Hierarchy** identified Milford Haven as a Hub Town.
- 4.2.6 **Policy SP13 Settlement Boundaries** indicates settlement boundaries define the areas within which development opportunities may be appropriate. Within Hub Towns, boundaries define the physical, functional and visual extent of the settlement, ensuring that development takes place in sustainable locations.
- 4.2.7 **Policy SP14 Hub Towns** indicates development will encourage communities and complementary relationships between the Towns by promoting each of the following:



1. Development in locations which support and reinforce the roles of the towns within the Hubs;
2. High quality accommodation that supports diversity in the residential market;
3. Opportunities for new commercial, retail, tourism, leisure and community facilities;
4. Appropriate land uses which are well-related to a Settlement Boundary; and
5. Accessibility to services by a range of sustainable modes of transport.

4.2.8 **Policy GN.1 General Development Policy** provides a comprehensive criterion for new development and includes (inter alia) considerations such as:

1. The nature, location, siting and scale of proposals and their compatibility with the capacity and character of the area.
2. Impacts upon local amenity in terms of visual impact, loss of light, privacy etc.
3. The impact upon landscape character.
4. The impact upon the natural environment including protected habitats and species.
5. The accessibility of the proposed site location, the impact upon highway safety and the ability to incorporate sustainable transport and accessibility principles.
6. Provide appropriate services, access and car parking.
7. The impact on health and safety.

4.2.9 **Policy GN.2 Sustainable Design** provides a comprehensive design criteria and indicates development will be permitted where (inter alia): it is of a good design which pays regard to local distinctiveness; is appropriate to local character; is resource efficient and climate responsive; achieves flexible and adaptable design; creates an inclusive and accessible environment; provides good quality public realm and provides well designed outdoor space.

4.2.10 **Policy GN.3 Infrastructure and New Development** indicates Where development generates a directly related need for new or improved infrastructure, services or community facilities and this is not already programmed by a service or infrastructure company, then this must be funded by the development.

4.2.11 **Policy GN.14 Major Out-of-Town Centre Development** indicates proposals for major retail development outside of the defined Town Centre boundaries will only be permitted where:

1. The development would not undermine the retail hierarchy set out in the Strategic Policies; and
2. The development either by itself or in combination with other permitted or allocated retail development would not undermine the vitality and viability of any of the Town Centres or Local Retail Centres.

4.2.12 The supporting policy text indicates in Pembrokeshire, modest scale development can have a significant impact on the vitality and viability of existing centres. For this reason a retail impact assessment will generally be required for developments above 500 sqm net.



- 4.2.13 **Policy GN.37 Protection and Enhancement of Biodiversity** indicates all development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity.

### 4.3 Local Development Plan Review (LDP2)

- 4.3.1 Between January and March 2020 Pembrokeshire County Council ran a consultation on the Deposit Plan and were aiming to publish a report of consultations from comments received to its Deposit Plan consultation alongside a set of recommended Focussed Changes in March 2021.
- 4.3.2 However in January 2021 NRW published new guidance in respect of phosphates levels to water ecosystems. In addition to changes required as a consequence of the phosphates issue, the Authority also confirmed that they were likely to make a range of other changes to the Deposit Plan of 2020 in response to consultation feedback and as a result of updated evidence/changes to national policy and context, including those required as a consequence of Covid-19. Accordingly there has been a delay to the preparation of the replacement LDP2.
- 4.3.3 As set out in the Delivery Agreement (Further Revised Version 20 June 2023), consultation on a new deposit was earmarked to start in January 2024 with adoption anticipated for October 2025. At the time of writing this statement however the second deposit stage has yet to commence.

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

- 4.4.1 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 but highlights three National Growth Areas, one of which is ‘Cardiff, Newport and the Valleys’.
- 4.4.2 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.



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

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

4.5.2 Key sections relevant to the proposals include:

- **Previously Developed Land** - PPW 12 indicates that previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development (para 3.55) and one of the national sustainable placemaking outcomes involves prioritising the use of previously developed land and existing buildings.
- **Placemaking** - PPW sets out that, in order to maximise well-being and the creation of sustainable places, the concept of ‘placemaking’ should be at the heart of the planning system. Paragraph 2.8 advises that development proposals “must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act’s Sustainable Development Principle”. Paragraph 2.9 goes on to clarify that “The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making”.
- **Needs Test** – PPW 12 advises that when determining planning applications for retail uses, planning authorities should first consider whether there is a need for additional retail provision (para. 4.3.14). Paragraph 4.3.15 goes on to explain that need may be quantitative, to address a quantifiable unmet demand for the provision concerned, or qualitative. Precedence should be given to establishing quantitative need before qualitative need is considered for both convenience and comparison floorspace.
- **The Sequential Test** - PPW 12 indicates Welsh Government operates a ‘town centres first’ policy in relation to the location of new retail and commercial centre development. It highlights that “the sequential approach applies to retail and all other uses complementary to retail and commercial centres”. Paragraph 4.3.18 clarifies that by adopting a sequential approach first preference should be to locate new development within a retail and commercial centre defined in the development plan hierarchy of centres.





- **Retail Impact Assessment** - Paragraph 4.3.26 advises that all retail planning applications or retail site allocations of 2,500 sq. m or more gross floorspace that are proposed on the edge of, or outside, designated retail and commercial centres should, once a need has been established, be supported by a retail impact assessment.
- **New Out-of-Centre Developments** - Paragraph 4.3.20 states that “New out-of-centre retail developments or extensions to existing out-of-centre developments should not be of a scale, type or location likely to undermine the vibrancy, attractiveness and viability of those retail and commercial centres that would otherwise serve the community and should not be allowed if they would be likely to put development plan retail strategy at risk”.
- **Economy & Jobs** - Section 5 of PPW recognises the role that retailing plays in supporting the economy. Paragraph 5.4.1 states that “For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. Paragraph 5.4.2 goes on to confirm that “Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services”.
- **Healthy Lifestyles** – Promoting healthier places forms a key Well-Being Goal set out in PPW. Paragraph 3.22 states LPA’s “...should develop and maintain places that support healthy, active lifestyles”. Paragraph 3.20 highlights “Disadvantaged and deprived communities tend to be disproportionately affected by health problems”.
- **Accessibility** - PPW sets out that the planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which for example: “are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car” (Paragraph 4.1.10). Paragraph 4.1.32 continues to indicate that: “Planning authorities must ensure new housing, jobs, shopping, leisure and services are highly accessible by walking and cycling”.
- **Green infrastructure (GI)** - PPW explains that GI plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in. Paragraph 6.2.4 advises that the planning system must maximise its contribution to the protection and provision of green infrastructure assets and networks as part of meeting society’s wider social and economic objectives and the needs of local communities. PPW further advises that a green infrastructure statement should be submitted with all planning applications and that this will be proportionate to the scale and nature of the development proposed describing how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question.



## 5.0 ASSESSMENT OF EXISTING RETAIL PROVISION

### 5.1 Introduction

5.1.1 This section of the assessment presents an analysis of the vitality and viability of Milford Haven town centre principally by assessing it against the measures of town centre vitality and viability identified in Technical Advice Note 4: Retailing and Commercial development. The town centre boundary is around 500m (walking distance) from the application site.

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

### 5.2 The Primary Catchment Area (PCA)

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

- the nature of the settlement involved (PCAs for market towns in predominantly rural areas would generally be wider than those within or in close proximity to 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.

5.2.2 In formulating the PCA careful regard has been paid to the shopping patterns identified in the household survey which underpins the assessment. The PCA is considered to broadly comprise Zone 4 (Milford Haven) of the South-West Wales Regional Retail Study (SWWRRS).

5.2.3 Inevitably some trade is likely to be drawn from outside the PCA however this is only likely to form a very small proportion of the overall turnover of the development. The extent of the PCA is shown on the plan attached at Appendix A. Accordingly the focus of the assessment of existing provision has been on Milford Haven centre.

### 5.3 Milford Haven Town Centre

5.3.1 Milford Haven is a town in the county of Pembrokeshire, South-West Wales; with an estimated population of 14,454 (2021)<sup>1</sup>. The town occupies a waterfront location, on the north side of the Milford Haven Waterway.

<sup>1</sup> [2021 Census for Milford Haven Parish](#)



5.3.2 The Pembrokeshire LDP identifies Milford Haven as a “Hub Town” within the settlement hierarchy and a “Town Centre” within the retail hierarchy. Milford Haven Town Centre comprises two distinct parts; the older area – which is concentrated along two parallel roads (Robert Street and Charles Street) and follows a grid format that is set back from linear form, immediately adjoining the waterfront. The designated centre is primarily formed by Charles Street, Robert Street, Hamilton Terrace, Dartmouth Street, and Priory Street.

## 5.4 Retailer Representation

5.4.1 The number of national multiple retailers within a town centre can provide a good indication of its relative strength. Milford Haven town centre benefits from a range of both local independents and national multiples. National multiple retailers within the centre include; Coral, Betfred, Nationwide Building Society and Greggs.

5.4.2 This offering of national multiple retailers is complemented by a strong collection of independent retailers including; Pheonix yarns, Cwtch Candles & Co, Fresh & Fruity Greengrocers, Milford Chemist and Pembrokeshire Primrose Café.

## 5.5 Diversity Of Uses

5.5.1 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 is attached at **Appendix B** for reference. It should be noted that the GOAD survey area directly relates to the town centre area defined by the LDP (as commonly is the case). A breakdown of units is set out in the table below.

Table 5.1: Diversity of Uses

Sector	GOAD Survey February 2023		CS Survey January 2024		UK Average 2024
	No. of Units	%	No. of Units	%	
Convenience	6	5.0%	6	5.3%	9.3%
Comparison	28	23.1%	24	21.1%	26.5%
Retail Services	15	12.4%	12	10.5%	15.8%
Leisure Services	26	21.5%	25	21.9%	25.7%
Financial & Business Services	9	7.4%	8	7.0%	8.4%
Vacant	37	30.6%	39	34.2%	14.0%
<b>Total</b>	<b>121</b>	<b>100%</b>	<b>114</b>	<b>100%</b>	<b>100%</b>

## 5.6 Vacancies

5.6.1 The centre vacancy rate is above the national average, with vacant units generally dispersed throughout the centre.



## 5.7 Accessibility

- 5.7.1 The centre is highly accessible and served by sustainable modes of public transport, including numerous bus stops located within the town centre; stops at Hamilton Terrace, Milford Town Hall and Market Square which provide access to the 302 – Hubberston, 300 – Herbrandston, 356 – Pembroke Dock & 315 - Haverford West services. Milford Haven train station is located approximately 250 metres northwest of the town centre and provides frequent services to regional and national destinations, including Haverfordwest, Carmarthen, Swansea, Cardiff, Newport and Manchester.
- 5.7.2 The centre is also highly accessible via private car, with the A4076 providing links north to Haverfordwest and the A40. The centre is served by a high level of parking provision, including surface level car parks at Dartmouth Street, Robert Street and Fluke Street. In summary, the centre is regarded as easily accessible to shoppers using a variety of transport modes.

## 5.8 Pedestrian Flows

- 5.8.1 Pedestrian flows can provide a good indicator of the strength of a centre. At the time of CarneySweeney’s survey (weekday mid-day) moderate levels of activity were observed within the core of the town centre and Milford Haven Health Centre. Lower levels of footfall were observed at Charles Street and Nelson Quay. Lower levels of footfall were also observed at Fluke Street and Francis Street, potentially due to their peripheral location or less active retail frontages. Pedestrian accessibility on the traditional town centre areas of Hamilton terrace and Charles Street is good, with no major impediments. However, the older areas of the town centre are poorly linked to the newer Milford Marina development.

## 5.9 Environmental Quality

- 5.9.1 Generally, shopfronts and building facades are well maintained throughout the centre. Areas of public space including those adjoining Charles Street & Hamilton Terrace are well kept, clean and tidy. The quality of the central retail area is generally good with evidence of recent investment in the street scene and public realm. The centre is perceived as a safe and pleasant shopping environment, adding to the vitality of public areas in the town centre.

## 5.10 Summary

- 5.10.1 Although vacancies are observed to be above national averages, Milford Haven benefits from a good mix of retail and service uses. The centre is accessible by a variety of transport modes, with good levels of car parking provision. The public realm throughout the town is of a good quality, kept clean and tidy and free from litter and graffiti, adding to the overall shopping experience.



## 6.0 NEED FOR THE PROPOSED DEVELOPMENT

### 6.1 Introduction

- 6.1.1 This section of the report assesses the retail ‘need’ for the development, in accordance with guidance provided in PPW, TAN 4 and the adopted LDP.
- 6.1.2 It should be noted from the outset of this section that the proposed development constitutes the redevelopment of existing Lidl store, albeit a larger premises; one that is better equipped to meet local retail customers’ needs. As such the existing store is already playing an important role in helping to meet existing local retail need; this need will continue to be met by the proposed new store. The demonstration of need for the extant floorspace is therefore not considered necessary. Instead, this chapter focuses on the proposed uplift or ‘new’ floorspace being delivered at the new foodstore i.e. circa 413.5 sqm net.
- 6.1.3 The Welsh Government does not prescribe any particular methodology for undertaking need assessments, and it is up to each local planning authority to be satisfied with quantitative retail need evidence in policy making or the development management process. Local planning authorities and developers should therefore ensure assessments are prepared in a clear, logical and transparent way with the use of robust and realistic evidence. (para 6.3, TAN4).
- 6.1.4 There are two acknowledged indicators of need: quantitative need – a statistical/numerical based assessment of need for additional floorspace; and qualitative need – an assessment of other nonnumerical considerations. Qualitative considerations can include (but are not limited to) addressing issues associated with overtrading, improving accessibility, widening choice of facilities and the redistribution of trade. Weight given to qualitative need is dependent on local circumstances.
- 6.1.5 Whilst an element of precedence is apportioned to quantitative need in PPW, it states that qualitative need and other factors are material considerations when considering need, with the weight apportioned being a matter for the decision-maker in each individual case. It is within the gift of the decision maker to apportion weight to qualitative indicators of need and other material considerations.

### 6.2 Quantitative Capacity

- 6.2.1 Table 6.1 overleaf (also provided at **Appendix C**) sets out a simple convenience expenditure capacity analysis within the PCA at 2029 i.e. the design year of the proposed redeveloped store.



**Table 6.1: Capacity for Additional Convenience Floorspace to 2029, Milford Haven (Zone 4)**

	2024	2029
[1] Available Convenience Expenditure in PCA (Zone 4 Milford Haven) (£m)	45.6	45.4
[2] PCA derived turnover of existing stores in PCA (Zone 4) (£m)	28.7	28.7
[3] Turnover of proposed development (£m)		4.3
[4] PCA derived Turnover of Convenience Retail Commitments in PCA (£m)	0	0
[5] Total PCA turnover (£m)	28.7	33.0
[6a] PCA convenience expenditure capacity (£m)	16.9	12.4
[6b] Retained market share of PCA spend (%)	62.9	72.6

**Notes**

taken from Table 10 Appendix C

6.2.3 It can be seen from the above table existing stores are assessed to draw turnover of c.£29m compared to an available expenditure of c.£45m. This indicates a proportion of available expenditure in the PCA will continue to ‘outflow’; that is, be spent beyond the PCA i.e. in an unsustainable manner. It indicates there is ‘capacity’ for additional floorspace in the PCA to meet this available expenditure and crucially increase Milford Haven’s self-containment. Therefore, it is entirely sensible that a modest quantum of additional floorspace is provided at an already well established, but better equipped store, such as that proposed, to meet this identified need. The table shows through the additional provision of floorspace within the PCA the local market share of expenditure will be increased to a more sustainable level.

## 6.3 Qualitative Considerations

6.3.1 Qualitative need is also an important consideration. It reflects the increasing recognition of the wider economic, social and environmental considerations in determining planning applications for retail proposals. It is of particular relevance in securing accessible, efficient, competitive and innovative retail provision which, in turn will allow increased investment and stimulate job creation.

6.3.2 Qualitative need considerations can include (but are not limited to) addressing issues associated with existing store operational inefficiencies/ deficiencies, improving accessibility and counteracting unsustainable shopping patterns.

6.3.3 When considering ‘need’ it is crucial to note in this instance that the proposal does not propose an entirely new operator but seeks to deliver an improved local store for an existing operator in Milford Haven; one which is long-standing and already well-established within the locality. The existing store has been trading for many years; it is popular and heavily relied upon by the local community. The fact that Lidl is taking the significant commercial investment decision to



purchase the adjacent site in order to deliver an improved premises and wider site is, itself, 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 enhanced premises.

## Meeting Local Consumer Need

- 6.3.4 Lidl's existing Milford Haven store is one of Lidl's "first generation" stores. The operational and customer requirements were very different then than they are today. Lidl (and the store's) growing popularity since first opening means the store as currently sized and arranged is no longer fit for purpose; it is no longer able to accommodate Lidl's operational format which has evolved over the years as the company's popularity has grown.
- 6.3.5 The store's age/format is leading to store operational issues e.g. limited space for display of product range. The rationale for the proposed store is clear; an improved store is required to ably meet local need. Obtaining planning consent will ensure that Lidl continues to be able to suitably serve local needs from what is a well-established existing retail destination. The enhanced store will help improve store operations. Overall, an improved customer experience will be achieved.
- 6.3.6 It is important to note the smaller format Limited Assortment Discounters (LAD) such as Lidl operate from far smaller stores than is typical of the large format 'big four' operators. It is now widely accepted that smaller format LADs have become increasingly popular in the last decade. Whilst the adequacy of existing provision is often assessed by local authorities in quantitative capacity terms, the effect of the increasing popularity of existing LADs and the qualitative issues that arise are typically overlooked. In scenarios such as this, where customer demand means the smaller, "first generation" Lidl stores are no longer capable of meeting local need, Lidl typically seeks to deliver enhanced stores, ideally at the existing site as currently proposed. This will ensure a high level of customer experience can be maintained at Great North Road, Milford Haven.
- 6.3.7 At 1,330sqm net in total the proposed store remains modestly scaled by supermarket standards. Notwithstanding this, it comprises the latest generation of Lidl store, providing ancillary staff/welfare facilities, bakery area, manager's office and customer toilets etc. Its delivery will be of direct benefit to both staff and customers alike. The store and site layout are more spacious than the existing store to be replaced and is better equipped to cater for its shoppers.
- 6.3.8 Chapter 10 of PPW advises that wherever possible retail provision should be located in proximity to other commercial businesses, facilities for leisure, community facilities and employment. Whilst out of centre, this location is well-established and popular as a retail destination. This 'symbiosis' may not be able to be replicated elsewhere if permission was withheld. The proposals seek to make the most efficient use of a longstanding existing retail destination. Delivery of an improved store could serve as a catalyst for further local development and will likely boost investor confidence.



## Counteract Unsustainable Shopping Patterns

- 6.3.9 As outlined above the proposed store seeks to ensure local shopping requirements continue to be adequately met at Great North Road, Milford Haven. In doing so, shoppers will be disinclined from generating unsustainable travel patterns by shopping further afield.
- 6.3.10 A proportion of 'leakage' is generally to be expected to higher order centres in the region; however, by enhancing existing provision in the PCA, Milford Haven, will be better equipped to cater for local needs locally and, in turn, counteract any propensity for shoppers to shop further afield – this is considered in more detail in Chapter 8.0. In this manner the proposal will help to address unnecessary car journeys. It is thus logical and eminently sensible in planning terms to enhance the Milford Haven retail environment at established operators/locations. The application site is an established retail site and is accessible by walking, cycling and public transport. Accordingly, it is considered an appropriate location for additional retail investment, subject to satisfying the sequential and impact tests.

## 6.4 Summary

- 6.4.1 Quantitative and qualitative need for the proposed development has been demonstrated. The application site is an established retail site proposed to be enhanced to better cater for its well-established customer base and meet the identified need for improved local facilities. It has been demonstrated improved retail provision will counteract an outflow of expenditure and help ensure retail need is met locally. Accordingly, in respect of PPW guidance, need for the proposed development is considered to have been demonstrated.





## 7.0 THE SEQUENTIAL APPROACH TO SITE SELECTION

### 7.1 Introduction

7.1.1 The general requirements of the sequential approach to site selection are set out at paragraphs 4.3.18 to 4.3.24 of PPW12. In summary, the sequential approach requires that all potential suitable and available town centre options, and then edge of centre options, are thoroughly assessed before out-of-centre sites are considered for key town centre uses. The approach requires pragmatism and flexibility from local planning authorities, developers and retailers alike. The onus of proof that more central sites have been thoroughly assessed rests with the developer.

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

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

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

### 7.2 Status of the Application Site

7.2.1 The application site falls within the defined settlement boundary for Milford Haven. It is not designated for any specific use (i.e. it is “white land”). It is located in an out-of-centre location in retail policy terms.

### 7.3 Application of the Sequential Approach

7.3.1 From the outset it is important to consider the application of the sequential approach. In doing so, we have had regard to the Supreme Court decision in *Tesco Stores Ltd v. Dundee City Council* [2012] UKSC13, which forms a material consideration in the application of the sequential approach. The case considers the meaning of ‘suitable’ whereby the judgement held that ‘suitable’ relates directly to the development proposed by the applicant, subject to a reasonable level of flexibility and realism being shown by the developers. LPAs should not require development to be altered or reduced so that it can be made to fit an alternative site, as to do so may be to make an inappropriate business decision on behalf of the developer.

7.3.2 The Dundee judgment is important in that it considers the focus of the local planning guidance relevant to that proposed development. It notes the focus “...is upon the availability of sites which might accommodate the proposed development and the requirements of the developer, rather than upon addressing an identified deficiency in shopping provision” (paragraph 27).



- 7.3.3 The Dundee judgement explains further: “... it would be an over-simplification to say that the characteristics of the proposed development, such as its scale, are necessarily definitive for the purposes of the sequential test. That statement has to be qualified to the extent that the applicant is expected to have prepared his proposals in accordance with the recommended approach: he is, for example, expected to have had regard to the circumstances of the particular town centre, to have given consideration to the scope for accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing. Provided the applicant has done so, however, the question remains, as Lord Glennie observed in *Lidl UK GmbH v Scottish Ministers* [2006] CSOH 165, para 14, whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site.”
- 7.3.4 In view of the above, any site being considered must therefore be suitable for the proposed development, albeit ensuring that flexibility is demonstrated (for example, number of parking spaces and servicing space, configuration of floorspace etc).
- 7.3.5 Another English appeal decision is relevant - that of a mixed-use scheme informally referred to as Rushden Lakes<sup>2</sup>, 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.
- 7.3.6 Similarly, neither PPW or TAN 4 asks whether such sites are likely to become available during the remainder of the plan period or over a period of years and no indication is given of the degree of flexibility required of applicants.
- 7.3.7 In the Scotch Corner appeal<sup>3</sup> the SoS endorsed the Inspector’s conclusion that the NPPF does not require disaggregation. This sets a baseline position where the SoS has decided disaggregation does not apply.
- 7.3.8 Against this backdrop of case law and recovered appeal decisions, PPW was revised in November 2016 (in the form of Edition 9 at that time). Edition 8 had previously stated, at paragraph 10.3.5:

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

<sup>2</sup> APP/G2815/V/12/2190175 - LXB RP (Rushden) Limited v East Northamptonshire Council, June 2014

<sup>3</sup> APP/V273/V/15/3132873 & APP/V2723/V/16/3143678 – Land at West of the A618 Barrack Bank, Scotch Corner, Dec 2016



7.3.9 This wording, which required disaggregation of elements of the scheme onto multiple sites was removed from PPW. Policy in Wales, therefore, does not require demonstration of a disaggregated approach (consistent with England and recent case law). It is clear, therefore, that **disaggregation is not a policy requirement**. In any event, given that the underlying premise of this application is to provide a larger, existing store to improve its operation and customer experience, breaking the proposal up into smaller elements would clearly fail to meet fundamental requirements of the development.

## 7.4 Sequential Site Search

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

- A site that can accommodate a store in excess of c.2,200 sqm gross to allow for provision of enhanced customer choice based on a full product range offer. The need to redevelop a larger store will address the deficiencies of the existing store, so it stands to reason that a smaller store would not address the need. **There is no prospect for disaggregation in this instance;**
- A site that can allow for the safe manoeuvring of customer vehicles and delivery vehicles;
- A prominent site with the ability to attract passing trade. This must be at least as prominent as the existing store or else there is no rationale for the relocation;
- A site that is easily accessible by a choice of means of transport;
- A site that is able to offer adjacent surface level car parking, so that customers can easily transfer goods to their vehicles, as they can from the existing store. To have otherwise would severely impact the appeal and viability of the store; and
- Provision of a dedicated service area to the rear of the store, including the ability to accommodate HGV's.

7.4.2 The approach that has been adopted in this sequential site analysis includes two elements; to firstly examine whether any sites or units are allocated in the adopted LDP, and secondly to undertake a detailed review of relevant nearby defined retail centres. A review of the Pembrokeshire LDP proposals map has revealed there are no retail allocations within or in close proximity to the defined Milford Haven Centre. As such, the sequential site search has focussed upon the results of a centre survey undertaken by CarneySweeney. A list of vacant units is outlined in the table overleaf.



Table 7.1: Vacant Sequentially Assessed Sites, Milford Haven

Unit nos.	Location	Description
15, 16, 18, 25-27 (The Gallery), 34, 37, 38, 41/41a, 45, 53, 59, 61, 63, 67, 70-78, 80, 88, 89b, 93, 100	Charles Street	Vacant units
behind 89, 92-94, 96, 136, 140	Robert Street	Vacant units
4	Mansfield Street	Vacant unit
10, 12, 13, 16, 20, 21, 25, 26a, 30	Hamilton Terrace	Vacant unit
5	Priory Street	Vacant unit

Notes: CS site survey Jan 2024

7.4.4 Whilst a number of the vacant units outlined above were observed to be available during the centre survey, the sequential site search of vacant units within Milford Haven Centre highlights the constrained, disparate and relatively small size of units within the centre. All the vacant units listed above are physically too small to accommodate the required floorspace of the proposed development which aims to provide an enlarged retail foodstore. On this basis, the vacant units identified above are considered unsuitable and have been discounted.

7.4.5 Furthermore, the identified units are primarily located on the traditional high street frontage within the Centre. As such, they do not benefit from directly adjacent, dedicated customer parking facilities, nor dedicated servicing facilities for HGV access. On this basis the vacant units are considered commercially unviable. In summary, the units identified as part of the sequential search are deemed both **unsuitable** and **unviable**. The units are therefore discounted from the sequential site search.

## 7.5 Conclusion

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

7.5.2 Nonetheless, the sequential test has identified that no sites can be considered available, suitable and viable sequentially preferable alternatives in respect of the proposals. The proposed development is considered, therefore, to fully accord with local and national policy and guidance as well judicial and appeal authority with respect to the sequential approach.



## 8.0 ASSESSMENT OF IMPACT

### 8.1 Introduction

- 8.1.1 This section of the report considers the potential trading impact of the proposals in respect of the anticipated diversion of retail trade to the proposed (enlarged) foodstore, with particular regard to Milford Haven centre.
- 8.1.2 PPW paragraph 4.3.26 advises that for development of 2,500sqm gross or more an impact assessment should accompany planning applications for main town centre uses that are not in a centre. It is important to note from the outset of this chapter that the proposed development for the most part effectively constitutes the re-provision of existing floorspace, albeit incorporating additional floorspace as part of delivering an enhanced store experience. In this respect the majority of the floorspace proposed is not “new” floorspace. Accordingly, this chapter focuses on the additional floorspace ‘uplift’ proposed i.e. 413.5sqm net. The proposed additional floorspace is well below the PPW/TAN4 floorspace threshold whereby impact assessments are typically sought. Notwithstanding this, in the interests of robustness, this section provides a proportionate assessment of impact for the proposed floorspace uplift.
- 8.1.3 The assessment is underpinned by a newly commissioned household survey, carried out independently by NEMS market research, to help understand existing shopping patterns.

### 8.2 Methodology and Evidence Base

- 8.2.1 The approach adopted in this impact assessment reflects national guidance and follows a widely adopted methodological approach to quantitative assessment in terms of assessing future capacity for retail development and quantifying impact. In practise the approach comprises five elements, as summarised below:

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

- 8.2.2 The primary catchment area is Zone 4 of the SWWRRS; this is the area in which the proposed development will draw the majority of its trade. Impact is assessed up to five years from the time of the application being made (base year). The design year of 2029 has been adopted for testing impact.

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

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



## Step 3 - Assess turnover and trade draw

- 8.2.4 The use of a newly commissioned local household telephone survey to identify existing shopping patterns and catchment area derived turnover levels of existing facilities is a widely adopted and industry accepted approach to understanding the turnover of existing facilities. In addition, the use of published evidence of sales densities derived from company accounts also provides an industry accepted approach upon which to gauge the turnover of a proposed development.
- 8.2.5 The characteristics of the development may give the best indication of where the new development is likely to draw its trade from. Trade is more likely to be drawn from similar competing facilities.

## Step 4 - Assess impact on existing centres.

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

## Step 5 – Consider consequences of impact.

- 8.2.8 Any conclusions should be proportionate. It is important that the impacts are considered on the vitality and viability of the whole of a centre, not simply on individual facilities which may be similar to the proposed development.
- 8.2.9 The assessment utilises the latest available population and expenditure projections derived from Experian and utilises a 2022 price base throughout.
- 8.2.10 The level of trade diversion is based on the generally acknowledged principles that:
- The trading effect on existing floorspace would generally be proportionate to their distance from the proposed new store. Numerous surveys of shopping patterns throughout the UK suggests that customers generally go to the store that is nearest to their place of residence which can provide for their particular shopping needs; and
  - Stores tend to compete on a 'like with like' basis, such that foodstore proposals which have dedicated surface level car parking and provide a similar range of in-store customer facilities, would tend to compete directly for trade.
- 8.2.11 Accordingly, this assessment is fully in accordance with prevailing recommendations and guidance in quantifying retail impact and comprises an orthodox and industry accepted approach to assessing impact. The statistical tables referred to in this section are provided at **Appendix C**.



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

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

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

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

## 8.4 Impact on Allocated Sites Outside Centres

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

## 8.5 Cumulative Effects of the Development

8.5.1 We note a large mixed-use development at Milford Haven Marina was granted permission under application 14/0158/PA in November 2019. This development includes no convenience floorspace.

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

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

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

8.6.2 It is widely accepted that retail uses tend to compete with their most comparable competitive facilities. For example, in an area already served by large modern convenience or comparison stores, the effects of new or improved stores are likely to fall disproportionately on the existing competing stores. Their proportionate impact on local independent retailers, for example, may be less. These accepted patterns suggest that the proposed redeveloped store will compete predominantly on a like for like basis with other foodstores, most notably those with broadly comparable retail offers offering the greatest competition currently.



- 8.6.3 The following paragraphs assess the potential impact of the proposal on in-centre turnover, before conclusions are drawn on the impact on in-centre turnover and trade. In considering impact on in-centre trade this section draws on the assessed retail turnover of the proposal and also considers the growth in population and 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**

- 8.6.4 Turnover is set out in detail in at Appendix C. The annual turnover of the proposed additional floorspace is assessed to be £4.5m in 2029 (allowing for inflow). It is assessed that 90% of the proposed development's turnover would be drawn from the catchment which, given the nature of the foodstore, is considered to be robust.

## **Expenditure Growth**

- 8.6.5 The tables at Appendix C apply the estimates of expenditure per person to the resident population within the Study Area in order to outline the available retail expenditure generated over the period to 2029.
- 8.6.6 Analysis of expenditure growth can help provide an indication of the potential impact of a proposal. The tables (4a-5a Appendix C) demonstrate the underlying position is one in which available convenience and comparison expenditure is expected to grow to 2029.
- 8.6.7 The expenditure analysis demonstrates there is sufficient expenditure growth to support any additional comparison turnover. Moreover, it is important to note Lidl's non-food offer is very modest, sold on a WIGIG basis (When It's Gone It's Gone) and typically purchased on an impulse basis. The choice of goods is constantly changing within the store and no type of comparison goods predominates at any given time. Crucially, Lidl is not, in itself, a comparison goods destination and thus the proposed store's capacity to affect local comparison shopping patterns is minimal. There is, therefore, very limited potential for Lidl's comparison goods range to impact upon any specific retailer/ centre as there is no consistency in the range of comparison retail goods that Lidl sells.
- 8.6.8 As such, the remainder of this analysis focuses on the quantitative effect of proposed additional convenience floorspace.

## **Trading Assessment**

- 8.6.9 This section of the statement considers the potential impact that the proposal may have on the pattern of retail expenditure in the surrounding area.
- 8.6.10 Set out at Table 11 of Appendix C is an assessment of how the development will affect the projected retail turnovers of facilities within the surrounding area.





- 8.6.11 As noted earlier in this section the methodological approach employed is widely adopted and accords with guidance set out in TAN4. It involves the following steps:
- i. Establishing the existing (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. Assessing the pattern of trade draw to the proposal on the basis that the redeveloped foodstore will compete predominantly like for like with other foodstores.
  - iv. Calculating the quantitative impact of the proposal, in terms of:
    - The percentage reduction in trade at each store/centre at 2029; and
    - The percentage change in retail turnover in each store/centre between 2024 to 2029.
- 8.6.12 The analysis is based on an assessment of existing stores/centre turnovers derived from the newly commissioned household survey underpinning the assessment.
- 8.6.13 The trading assessment provided predominantly considers the convenience turnover of the stores/centre. However, it is important to recall that the total retail turnover of a centre/destination consists of a combination of both convenience (food) and comparison (non-food) turnover. Impact must be weighed in the context of the whole of the centre. Accordingly, Table 11 considers the overall impact of selected Pembrokeshire-based stores having regard to available comparison turnover information.
- 8.6.14 Assessed levels of trade diversion to the new development is based on careful scrutiny of the function and retail offer of various stores; the relative accessibility of the various facilities by car and public transport; and the known characteristics of existing trading patterns (including the existing Lidl store at Great North Road) and store market penetration (as outlined in Table 7). It is important existing trading patterns are taken into account, especially given the proposed development is for a redeveloped store (the existing store already forms part of the local retail environment).
- 8.6.15 Impact is assessed on a 'like for like' basis in respect of the convenience sector. It is widely accepted that retail uses tend compete with their most comparable competitive facilities. For example, in an area already served by modern convenience stores, the effects of new bespoke stores are likely to fall disproportionately on the existing competing modern stores. Their proportionate impact on smaller and local independent retailers, for example, may be less. Likewise, a proposal for a 'main food shop' supermarket is also less likely to compete with smaller 'top-up' convenience stores and corner shops.
- 8.6.16 These accepted patterns suggest that the proposed development will continue to compete predominantly on a 'like for like' basis with large/medium sized foodstores; by their nature these are more commonly accommodated in out of centre locations.



## Trading Effects

- 8.6.17 Two measures of retail impact are set out in Appendix C:
- 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/stores.
- 8.6.18 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 surrounding, competing centres/stores within the period to 2029. However, Table 11 highlights that the surrounding area is predominantly served for main food shopping by large out of centre foodstores which, broadly speaking, are trading strongly. The main offer in Milford Haven is at the out of centre Tesco at Havens Head Park. A significant proportion of trade is also anticipated to be diverted from the Tesco Extra at Fenton Trading Estate, Haverfordwest, which is a popular destination for Milford Haven based shoppers. Similarly, trade will be drawn from Tesco at London Road, Pembroke Dock and Aldi at Eastern Avenue, Pembroke Dock. The proposed development will draw the majority of trade from these stores. Notwithstanding this, the assessment finds they will continue to trade strongly.
- 8.6.19 Table 11 at Appendix C demonstrate the effects of the proposed foodstore is anticipated to be predominantly felt by these 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.
- 8.6.20 It should also be recalled that PCA population and comparison expenditure will grow in the period to 2029 which will help offset or mitigate the impact arising from trade diversion to the proposed foodstore over the same period.
- 8.6.21 Having regard to the role, function, and vitality and viability of existing centres, the assessed levels of impact are not considered to be significantly adverse. In respect of impact on out of centre facilities, as outlined, these derive no protection from the planning system and need not be considered in further detail. Irrespective, they are well equipped to absorb the assessed trade diversion.

## 8.7 Summary

- 8.7.1 In summary, the proposed development constitutes the redevelopment of an existing, long standing and well-established local retail store, to deliver an enhanced facility for local shoppers.
- 8.7.2 The enhanced store proposes an additional c.413.5sqm net floorspace, well below the PPW floorspace threshold, but which provides the focus of a proportionate impact assessment.



- 8.7.3 The assessed impact of the proposed development is within acceptable levels, the vast majority of which falls on out of centre, unprotected destinations/facilities. These stores are equipped to absorb the relatively modest anticipated trading impact, which will be offset by a growth in population and retail expenditure in 2029. It has been demonstrated the proposed development does not result in any significant adverse impact on in-centre turnover and trade; in particular there is no evidence to suggest it will unacceptably affect the vitality and viability at Milford Haven town centre.



## 9.0 NON-RETAIL PLANNING ISSUES

### 9.1 Introduction

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

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

### 9.2 Principle of Development

9.2.1 The adopted Pembrokeshire LDP indicates that the application site occupies a position inside the defined settlement boundary. The application site is not allocated for a specific use within the LDP and constitutes 'white land' as per the Proposals Map. As such, Policy SP13 confirms areas within the settlement boundary may be appropriate for development opportunities. As highlighted above, the application site is situated in Milford Haven, which the LDP defines as a 'Hub Town'. Policy SP13 indicates within Hub Towns, the settlement boundary defines the physical extent of the settlement, ensuring that development takes place in sustainable location. On this basis, the application site occupies a sustainable position within the settlement boundary, adhering to Policy SP13; establishing a basic principle of development.

9.2.2 Furthermore, Policy SP14 indicates development should seek to support and reinforce the role of Hub Towns, provide opportunities for new retail proposals and be accessible via a range of sustainable modes of transport. The proposed retail use within the settlement boundary of a Hub Town therefore adheres to Policy SP14, solidifying the role of Milford Haven. Additionally, the site's location within an established settlement pattern allows for high levels of accessibility via active travel and sustainable public transport. In summary, a robust principle of development has been established at the application site.

### 9.3 Sustainability

9.3.1 It is considered the application site occupies an inherently sustainable location, with excellent links to surrounding settlements, established services and facilities and sustainable transport routes. As highlighted in the preceding sections, the site is located approximately 0.5 km northeast of Milford Haven town centre which offers a wide range of services and facilities.



Therefore, the development occupies a wholly sustainable location and complies with the principles of sustainable settlement patterns.

- 9.3.2 In terms of access to sustainable forms of public transport, the nearest bus stop adjoins the site to east on Great North Road, providing frequent access to the 300, 302, 315 & 356 bus service. In terms of active travel, the site benefits from good pedestrian linkages, with pedestrian footpaths lining Great North Road. This enables comfortable and safe pedestrian access to the surrounding area. Although the surrounding footpaths do not include dedicated cycle routes, Great North Road is entirely capable of safely accommodating cyclists.
- 9.3.3 In summary, the proposed development site occupies a highly sustainable location, in close proximity to nearby services and facilities. Furthermore, the site is advantageously located to take advantage of sustainable transport links, including public transport routes and active travel opportunities.

## 9.4 Highways & Access

- 9.4.1 A Transport Assessment has been prepared by Corun Associates in support of the application and examines the highway and transportation issues associated with the proposed development.
- 9.4.2 Vehicular access to the existing store site is currently provided via a simple priority T-junction with the A4076 Great North Road. The existing store access will be stopped up and a new access constructed approximately mid-way along the site frontage. The other access points on Great North Road that serve the car rental unit and residential properties will also be stopped up, with a new footway formed. The new access will be a simple priority T-junction with dedicated left and right turn lanes on exit from the site, and an overall width of 10.5m. Swept path analysis for a max legal 16.5m articulated vehicle accessing the proposed site shows that there is sufficient room for a vehicle of this size to manoeuvre within the site, and safely enter and exit this junction in a forward gear.
- 9.4.3 Pedestrian access into the site will also be provided at the new site access junction. From the access junction, a pedestrian route with marked crossing points will continue towards the proposed store entrance. The existing pedestrian access via the alleyway off Greville Road will be blocked up.
- 9.4.4 In addition, a new bus stop, including kerbs, shelter and seating will also be provided, within the newly constructed footway section to the north of the new access. These improvements will help to further promote bus travel to and from the site.
- 9.4.5 A robust highway impact assessment has been undertaken identifying that over the 12-hour weekday period between 07:00 to 19:00, the proposed re-development would lead to an increase in traffic of just 6.6%, an increase of 112 two-way movements in the vicinity of the site. This equates to approximately just +9 two-way movements per hour. During the weekday peak hour store period (11:00 to 12:00), this increase in traffic is predicted to amount to just



+12 two-way movements. These values represent a very 'worst case' scenario, and do not include any reductions expected as a result of linked or pass-by trip considerations. Nor has any allowance been made for the loss of traffic associated with the two residential properties or the existing car rental business. It is therefore concluded that the redevelopment of the site will have a minor impact on traffic flows on the local highway network and raises no major congestion concerns.

- 9.4.6 A review of the accident data identifies no significant clusters across the local highway network and does not therefore appear to identify any significant highway safety issue within the immediate area of the development site. The increase in traffic generated by the proposed development is unlikely to exacerbate the existing safety record to a significant enough level to warrant concern. The recent speed limit reduction to 20mph, as of September 2023, should also reduce the number of accidents and severity over time. The removal of the existing vehicular access points for the Enterprise car rental site and the existing dwellings on the site will also bring with it potential highway safety improvements along this section of the road.
- 9.4.7 In summary, the Transport Statement demonstrates that the development should be considered acceptable in terms of highways and transportation and there are no reasons why the proposed development should not be granted consent. We concur with this view and consider the application to be compliant with Policy GN.1 (criterion 5) of the LDP.

## 9.5 Parking Provision

- 9.5.1 A total of 94 car parking spaces are proposed at the new Lidl foodstore unit. These are within the maximum guidelines identified by local guidelines set out by Pembrokeshire County Council and based on the operator's extensive experience of demand at stores throughout the UK, is considered to be appropriate for the intended food store use.
- 9.5.2 A total of 15 enhanced parking bays (6 disabled and 9 parent and child) are proposed. This represents 15% of the total provision.
- 9.5.3 A total of 10 Sheffield cycle stands (allowing parking for up to 20 bicycles), and 2 electric vehicle charging spaces are also included within the proposals. These will help encourage these more sustainable modes of travel to the site.

## 9.6 Design & Landscaping

- 9.6.1 The application is accompanied by a Design and Access Statement (DAS) which explains the site, its surroundings, the design constraints and design rationale for the proposed development.
- 9.6.2 The proposed development will be built in accordance with Lidl's contemporary specification, creating a bright, spacious sales area with full height glazing to the front elevation facing onto Great North Road adding natural light to the shopping environment and modernizing the visual appearance.



- 9.6.3 The proposed elevations have been designed to provide activity and identity to the public frontages that respond to the geometry and site topography, whilst maintaining adequate clearances and separation and remain in keeping with the surrounding built environment. The elevations comprise white and grey clad panels. A limited but coherent palette of materials is proposed to create visual consistency. Each elevation treatment responds to its specific context by utilising carefully selected robust and high-quality components. For reference, a full palette of materials is set out in the accompanying Design and Access Statement.
- 9.6.4 Perimeter landscaping and proposed new landscaped areas will frame the proposed foodstore, adding visual interest and softening the schemes appearance. For detailed landscaping proposals please refer to the Landscape Proposals Drawing Ref: CA-2024-LIDL-MH -03. The site will have a Five-Year Landscape Management Plan which will include annual inspections and reports to assess the establishment of the landscape and undertake defects replacements in this period and copied to the ecologist. The ecologist will undertake monitoring inspections in years 2 and 4 and additional visits if annual reports raise issues. Revisions to the management plan will be made as necessary to assist successful establishment.
- 9.6.5 In summary, the proposed development will provide a contemporary shopping environment that compliments and enhances the site's immediate surroundings. It is considered the proposed development fully complies with Policy GN.2 Sustainable Design of the LDP.

## 9.7 Ecology and Green Infrastructure

- 9.7.1 A Preliminary Ecological Appraisal (PEA) has been prepared by Biodiverse Consulting in support of the application which presents the findings of an ecological appraisal of the site and key ecological constraints and opportunities in relation to the proposed development.
- 9.7.2 In terms of designated sites, the PEA confirms that the site is located within the Natural Resources Wales Priority Area – Coastal Saltmarsh non- statutory designated site, however no habitat of this type is present within the Site. Two statutory designated sites were identified within 2km; the Milford Haven Site of Special Scientific Interest (SSSI) and Pembrokeshire Marine Special Area of Conservation (SAC). There are no records of Priority Habitats within or bordering the site.
- 9.7.3 The site was subjected to a walkover survey during which habitats were assessed in line with the UK Habitat Classification (UKHab) methods. As part of the survey, the site was also checked for evidence of protected and priority species, and habitats were assessed for their potential to support them. The findings of the desk study and survey are as follows:
- **Great Crested Newt** - No records of GCN were returned and no ponds were identified within 500m of the site. One pond is located within the vegetated Garden on site however this is considered to have 'poor' suitability. The unmown lawn and scrub within the vegetated gardens provide suitable foraging and commuting habitat for GCN during the



terrestrial phase, however due to the lack of suitable breeding ponds on site and within 500m, it is unlikely that an important assemblage of GCN is present. GCN are therefore scoped out of further assessment.

- **Bats** - Records were found for several bat species within 2km and the vegetated gardens on site and beyond the site's boundary afford opportunities for foraging bats. Foraging and commuting opportunities in the wider area are considered good, with a range of woodland, hedgerows, and watercourses present, however, connectivity to these areas is restricted due to main roads and disturbance from street lighting and residential properties. Roosting opportunities on site are afforded by the residential buildings.
- **Birds** - A number of bird records were returned, including Schedule 1 and Red-Listed species as well as records for local priority species. Opportunities for foraging and nesting are provided within the vegetated gardens for a range of locally common species. Disturbance in the form of noise and light pollution from the adjacent residential properties, existing food store, and main road limit the suitability for breeding birds. Overall, the site is considered to be of low value for birds.
- **Badgers** - There is one record of badger 1.8km from the site in 2018. The vegetated gardens offer suitability for foraging, however, access to this habitat is restricted by walls and fencing. No badger activity or signs of badger, such as setts, snuffle holes, latrines or hair were recorded during the walkover survey. It is unlikely that badger is present on site, and they are therefore scoped out of further assessment.
- **Reptiles** - Records for several reptile species were found within 2km of the site. Limited suitable habitat is afforded by the vegetated gardens due to the presence of open lawns, dense scrub, and concrete paving slabs, providing opportunities for basking, shelter, and foraging for a range of reptile species. However, the two gardens on site and gardens adjacent to the site are separated by fences and walls, restricting movement to/from the site. Connectivity to the wider landscape is restricted by the presence of roads. It is unlikely that an important assemblage of reptiles is present on site, and they are therefore scoped out of further assessment.
- **Priority Species** - The site has the potential to support priority species including hedgehog and common toad, however, no evidence of priority species was found at the time of survey.

9.7.4 Further surveys in respect of an updated botanical survey and a bat activity survey will be undertaken within the optimal period.

9.7.5 The appraisal indicates that the development has the potential to adversely impact ecological features however many of these can be adequately addressed through a range of good practice avoidance, mitigation and compensation measures as set out in the PEA report.





- 9.7.6 Based on the ecological survey work undertaken to date there is nothing to suggest that the proposed development will lead to a significant impact on any known protected species or ecological features. It is considered that with careful design considerations and appropriate mitigation measures the development proposals will be in accordance with LDP Policy GN.37 Protection and Enhancement of Biodiversity.
- 9.7.7 A Green Infrastructure (GI) Statement has also been prepared which explains that the site itself has limited ecological value and is fragmented into separate areas. The proposed site will provide an improvement in connectivity internally by planting on all boundaries with the inclusion of trees and native shrubs and hedges together with other berrying and seeding plants and pollinators.
- 9.7.8 The GI further explains how soft landscape area at the rear of the store will be a nature conservation area with only native trees and shrubs, log piles and a hibernaculum and other features and the street trees proposed for the site frontage will be a positive element in the Great North Road both visually, for biodiversity and uplift the feeling of the area. The native trees on the western boundary will reinforce the existing trees in rear gardens and will form a type of ecological corridor with potential links externally as the site itself is poorly connected to any external green network.
- 9.7.9 The GI statement concludes that taking into account the site's setting within a dense urban location, overall it is considered the proposal will provide a biodiversity net gain.

## 9.8 Noise

- 9.8.1 A noise assessment has been prepared by Inacoustic in support of the application. The noise assessment considers noise associated with mechanical services and plant equipment, delivery vehicles and customer vehicles in the car park.
- 9.8.2 The noise assessment sets out a number of mitigation measures that are proposed which include the provision of a 2.4 metre high solid barrier along the northern side of the loading bay ramp as well as a 4 metre high acoustic barrier around the plant compound.
- 9.8.3 The noise assessment confirms that the installation of specified plant for the store will comprise a "low impact" in the context of the guidance set out in BS4142:2014+A1:2019, during both the daytime and night-time period, when taking into account the noise mitigation measures proposed.
- 9.8.4 In terms of noise from vehicle deliveries during the day, the Noise Assessment predicts this noise source is unlikely to significantly increase noise levels at the closest sensitive dwellings and as such, will result in no worse than a negligible impact.



- 9.8.5 The noise assessment 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 no worse than a minor impact.
- 9.8.6 The noise assessment concludes that the potential noise impacts associated with the proposed development can be adequately controlled by appropriate design and mitigation and therefore noise should not be considered a constraint to the granting of planning permission for the proposals. We concur with this view and consider the proposed development incorporates suitable design mitigation to ensure it fully complies with Policy GN.1 General Development Policy (criterion 2) of the LDP.

## 9.9 Drainage

- 9.9.1 A Flood consequences Assessment (FCA) and Drainage Strategy has been prepared by Waterco in support of the planning application. The purpose of the report is to outline the potential flood risk to the site, the impact of the proposed development on flood risk elsewhere, and measures which could be incorporated to mitigate the identified flood risk (if any). The aim of the Drainage Strategy is to identify water management measures, including Sustainable Drainage Systems (SuDS), to provide surface water runoff reduction and treatment in accordance with the Welsh Government’s statutory standards for SuDS.
- 9.9.2 The FCA advises that the site is located within Flood Zone A on the Welsh Government Development Advice Map – an area considered to be at little or no risk of fluvial or tidal flooding, with a less than 0.1% (1 in 1000) annual probability of flooding. The NRW ‘Flood Map for Planning’ shows that the site is located within an area outside of the extreme flood extent (Flood Zone 1), meaning it has a less than 0.1% annual probability of flooding.
- 9.9.3 The report explains that the risk of flooding from all sources has been considered and it can be concluded that the risk of flooding is very low and as such, no flood risk mitigation measures are deemed necessary.
- 9.9.4 In terms of drainage the report advises that the proposed development will include impermeable drainage area in the form of the new Lidl Store, car park and site access. A new sustainable drainage system is proposed in order to comply with the Statutory Standards for SuDS and create betterment over the existing situation.
- 9.9.5 All methods of surface water discharge have been assessed. Infiltration techniques are not considered feasible due to the presence of clay. There are no nearby watercourses or public surface water sewers. As such, discharge of surface water to the public combined sewer in Great North Road to the east of the site is proposed. The site currently discharges surface water to the public combined sewer at an unrestricted rate.
- 9.9.6 It is proposed to limit the discharge to a rate of 3.5 l/s (1 in 1 year greenfield rate). This will provide significant betterment over the existing brownfield runoff rate of 38.5 l/s.



- 9.9.7 Attenuation storage will be required on site in order to restrict surface water discharge to 3.5 l/s. Attenuation can be provided within the lined sub-grade of the permeable surfaced car parking spaces. Permeable surfacing will provide treatment to runoff. Rain gardens will also be used to maximise the amenity and biodiversity value of the drainage system.
- 9.9.8 Foul flows will be discharged to the public combined sewer in Great North Road, as agreed with DCWW.
- 9.9.9 On the basis of the FCA and Drainage Strategy report prepared by Waterco we consider that the proposal complies with criterion 3 of LDP Policy GN.2 Sustainable Design.

## 9.10 Trees

- 9.10.1 A Tree Survey & Assessment has been prepared by ArbsTS in support of the application. The survey identified 7 no. individual trees at the application site. Of the individual trees, 1 no. was assessed as Category B (moderate quality and value) and 6 were assessed as Category C (low quality and value).
- 9.10.2 A Tree Constraints Plan has been prepared by ArbsTS in support of the application. In order to identify the above and below ground constraints presented by existing retained trees at the Milford Haven site, the locations, numbers and assessed category of these trees, together with their crown spread, root protection areas (RPA) and shadow patterns, have been summarised and plotted on to the Tree Constraints Plan. This drawing is included in Appendix 2 of the Tree Report.
- 9.10.3 The Tree report explains that a small number of trees will need to be removed to facilitate the construction of the new store. However all but one of these trees are low-quality trees (C Category) and do not therefore present a constraint on developing the site. The removal of the one moderate-quality tree (B Category = T2) can be mitigated for by suitable compensatory tree planting.
- 9.10.4 The Tree Report advises that providing construction is undertaken in compliance with the tree protection scheme as set out in the report, there will be no significant long-term adverse Arboricultural impact on the health of any retained trees on or adjacent to this site or the long-term amenity of the area.

## 9.11 Economic Benefits

- 9.11.1 TAN 23 defines economic development broadly so that it includes any form of development that generates wealth, jobs and income. TAN 23 states the economic benefits of proposals and market needs should be fully considered when determining planning applications (paragraphs 1.2.1-2).



- 9.11.2 PPW recognises the role that retailing plays in supporting the economy. In PPW economic development is defined as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes (paragraph 5.4.1). Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services (paragraph 5.4.2).
- 9.11.3 Jobs from the existing Lidl store will be transferred with the prospect of further job opportunities in the new larger store.



## 10.0 CONCLUSION

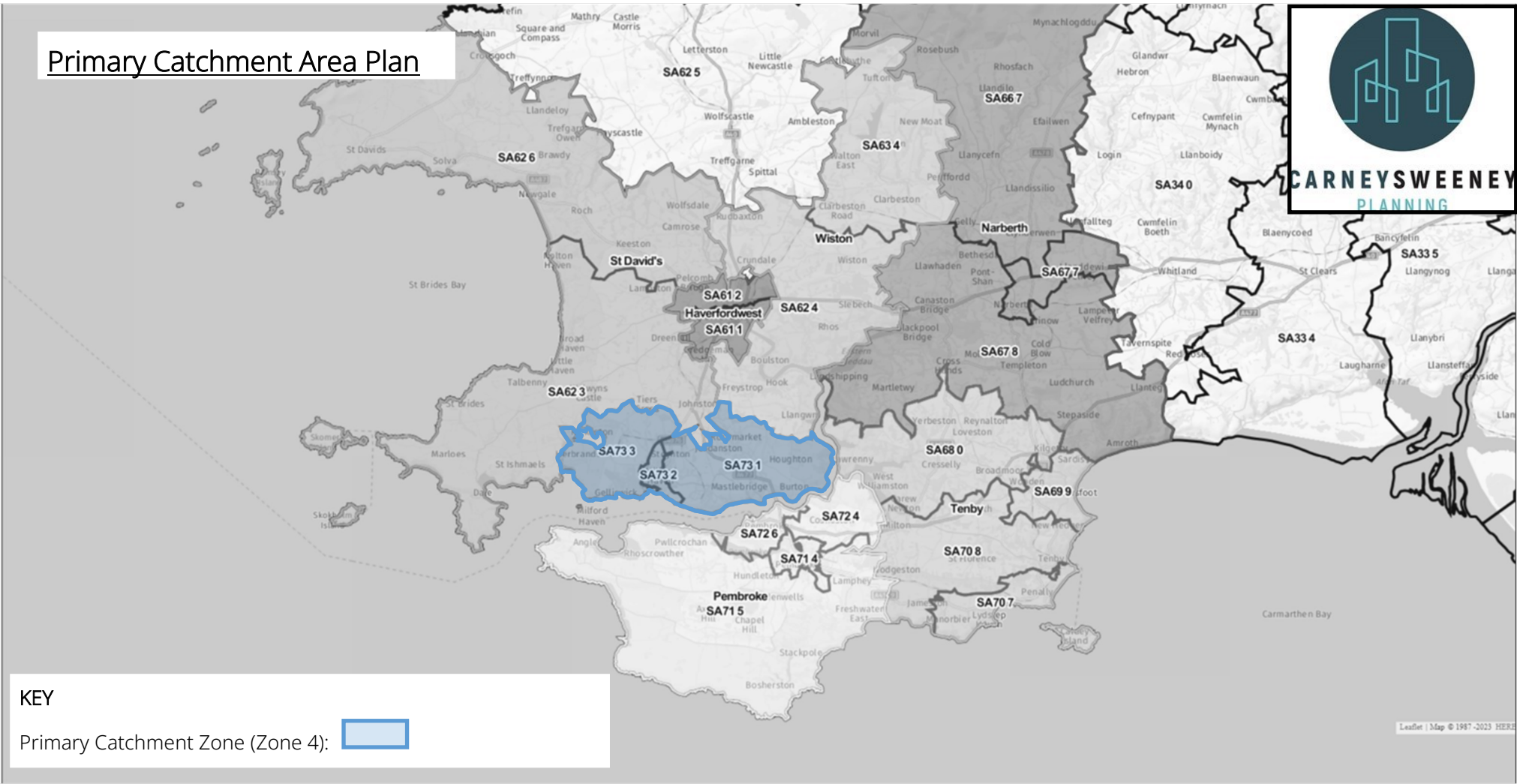
- 10.1.1 This planning and retail statement has been prepared by Carney Sweeney on behalf of the applicant, Lidl Great Britain Ltd., in support of a full planning application to be submitted to Pembrokeshire County Council for the demolition the existing Lidl foodstore and adjoining buildings, and the erection of a new Lidl foodstore, access, car parking, landscaping and all associated works at Lidl, Great North Road, Milford Haven.
- 10.1.2 In light of the above findings we make the following conclusions:
- Quantitative and qualitative need for the proposed development has been demonstrated. The application site is an established retail site proposed to be enhanced to better cater for its well-established customer base and meet the identified need for improved local facilities. It has been demonstrated improved retail provision will help counteract an outflow of expenditure and help ensure retail need is met locally.
  - The sequential test has identified that no sites can be considered available, suitable and viable sequentially preferable alternatives in respect of the proposals. The proposed development is considered, therefore, to fully accord with local and national policy and guidance as well judicial and appeal authority with respect to the sequential approach.
  - The proposed development constitutes the redevelopment of an existing, long standing and well-established local retail store, to deliver an enhanced facility for local shoppers. The enhanced store proposes an additional c.413.5 sqm net floorspace, well below the PPW floorspace threshold, but which provides the focus of a proportionate impact assessment.
  - The assessed impacts of the proposed development are within acceptable levels, most of which fall on out of centre, unprotected destinations/facilities. These stores are equipped to absorb the relatively modest anticipated trading impact, which will be offset by a growth in population and retail expenditure in 2029. It has been demonstrated the proposed development does not result in any significant adverse impact on in-centre turnover and trade; in particular there is no evidence to suggest it will unacceptably affect the vitality and viability at Milford Haven centre
- 10.1.3 The proposal is considered acceptable in all other technical aspects including accessibility/car parking; flood risk and drainage; ecological impact; design and landscaping.
- 10.1.4 The proposed development's accordance with planning policy at all levels provides an overall balance of consideration which weighs firmly in favour of permitting the current proposals.



## Appendix A – Primary Catchment Area (PCA)



# Primary Catchment Area Plan



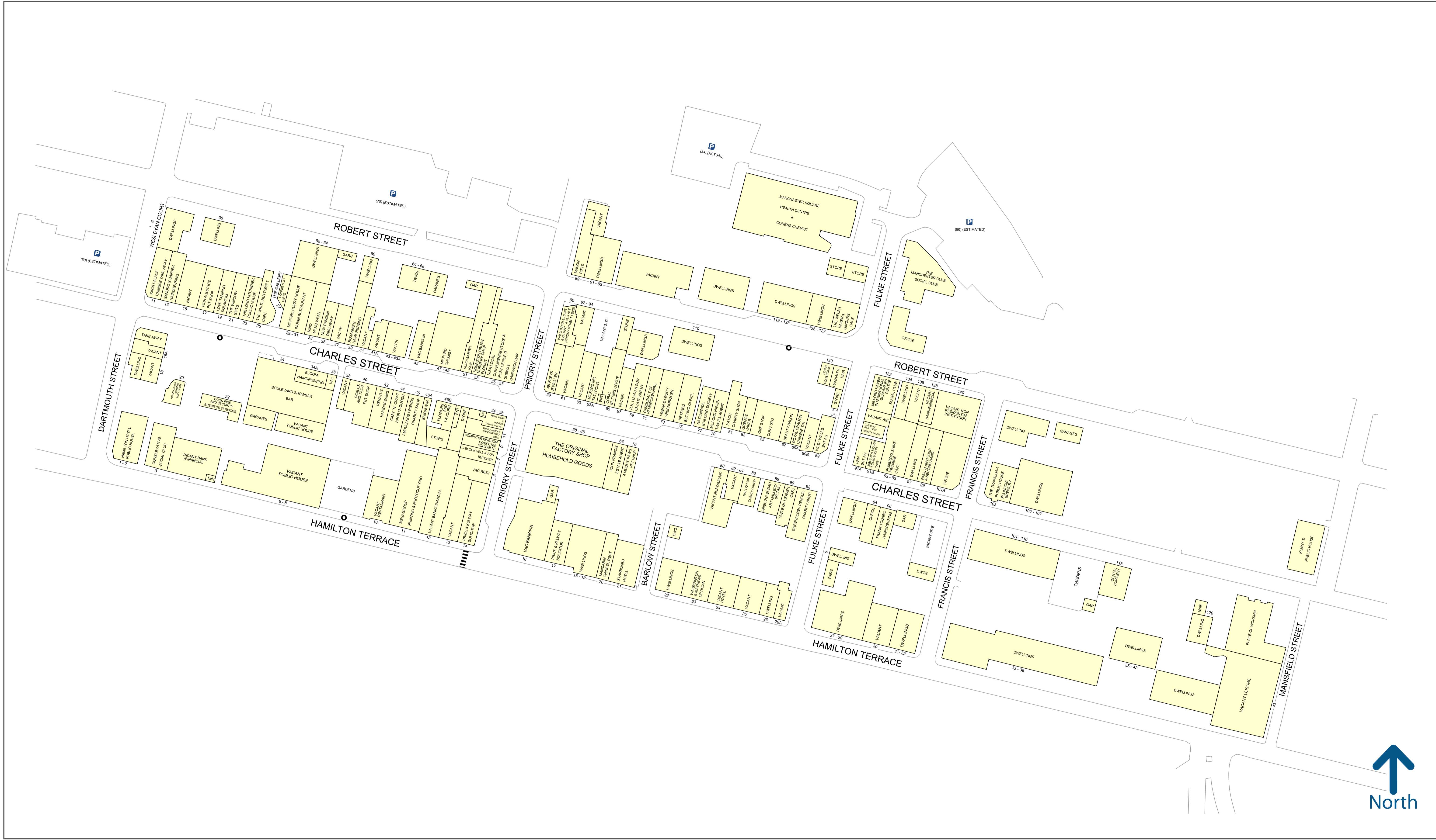
## KEY

Primary Catchment Zone (Zone 4): 

## Appendix B – Milford Haven Town Centre GOAD Plan







Experian Goad Plan Created: 16/01/2024  
 Created By: Carney Sweeney Ltd



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## Appendix C – Statistical Tables



Table 1: Population

Zone	2024	2025	2026	2027	2028	2029	Change 2024-2029	
							No.	%
					[2]		[3]	[4]
Zone 4 Milford Haven	20,764	20,820	20,866	20,897	20,929	20,965	201	1.0
Zone 5 Pembroke Dock	20,995	21,053	21,082	21,109	21,144	21,167	172	0.8
Zone 6 Tenby	17,293	17,329	17,336	17,364	17,377	17,408	115	0.7
<b>Total</b>	59,052					59,540	488	0.8

Notes:

Population projections obtained from Experian Location Analyst Report

[3] = [2] - [1]

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

Lidl Great Britain Ltd  
 Land at Great North Rd, Milford Haven

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

Zone	2024	2025	2026	2027	2028	2029
Zone 4 Milford Haven	2,196	2,183	2,174	2,170	2,168	2,166
Zone 5 Pembroke Dock	2,256	2,242	2,233	2,229	2,226	2,224
Zone 6 Tenby	2,366	2,352	2,342	2,337	2,335	2,333

Notes:

per capita figures sourced from Experian Location Analyst report data  
 Excludes SFT in line with Fig 5 of EXRPBN 21 (Feb 2024)  
 subsequent years projected forward in accordance with growth rates set out in App 3 of EXRPBN 21 (adj. for SFT (sales via stores))

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

Zone	2024	2025	2026	2027	2028	2029
Zone 4 Milford Haven	2,454	2,484	2,556	2,620	2,677	2,739
Zone 5 Pembroke Dock	2,529	2,559	2,634	2,700	2,759	2,822
Zone 6 Tenby	2,693	2,726	2,805	2,875	2,938	3,006

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 (adj. for SFT (sales via stores))

2022 prices

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

Zone	2024	2025	2026	2027	2028	2029	Change 2024-2029	
	[1]					[2]	£m	%
Zone 4 Milford Haven	45.6	45.5	45.4	45.3	45.4	45.4	-0.2	-0.4
Zone 5 Pembroke Dock	47.4	47.2	47.1	47.0	47.1	47.1	-0.3	-0.6
Zone 6 Tenby	40.9	40.7	40.6	40.6	40.6	40.6	-0.3	-0.7
<b>Total</b>	<b>133.9</b>	<b>133.4</b>	<b>133.1</b>	<b>133.0</b>	<b>133.0</b>	<b>133.1</b>	<b>-0.8</b>	<b>-0.6</b>

Notes:

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

[3] = [2] - [1]

[4] = [3]%

Table 4b Total main food shopping expenditure (£m)

Zone	2024	2025	2026	2027	2028	2029
Zone 4 Milford Haven	37.7	37.6	37.5	37.5	37.5	37.5
Zone 5 Pembroke Dock	38.4	38.3	38.2	38.1	38.2	38.2
Zone 6 Tenby	34.1	34.0	33.9	33.9	33.9	33.9
<b>Total</b>	<b>110.2</b>	<b>109.8</b>	<b>109.5</b>	<b>109.5</b>	<b>109.5</b>	<b>109.6</b>

Notes:

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

Table 4c Total top up food shopping expenditure (£m)

Zone	2024	2025	2026	2027	2028	2029
Zone 4 Milford Haven	7.9	7.9	7.9	7.9	7.9	7.9
Zone 5 Pembroke Dock	9.0	8.9	8.9	8.9	8.9	8.9
Zone 6 Tenby	6.8	6.8	6.7	6.7	6.7	6.7
<b>Total</b>	<b>23.7</b>	<b>23.6</b>	<b>23.5</b>	<b>23.5</b>	<b>23.5</b>	<b>23.5</b>

Notes:

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

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

Zone	2024	2025	2026	2027	2028	2029	Change 2024-2029	
	[1]					[2]	£m	%
							[3]	[4]
Zone 4 Milford Haven	51.0	51.7	53.3	54.7	56.0	57.4	6.5	12.7
Zone 5 Pembroke Dock	53.1	53.9	55.5	57.0	58.3	59.7	6.6	12.5
Zone 6 Tenby	46.6	47.2	48.6	49.9	51.1	52.3	5.7	12.3
<b>Total</b>	<b>150.6</b>	<b>152.8</b>	<b>157.5</b>	<b>161.6</b>	<b>165.4</b>	<b>169.5</b>	<b>18.8</b>	<b>12.5</b>

Notes:

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

[3] = [2] - [1]

[4] = [3]%

Table 5b: Total Comparison Expenditure 2024 (£m) (Ex SFT)

	Zone 4	Zone 5	Zone 6
Clothing & Footwear	11.0	11.5	9.9
Furniture & Floor Coverings	4.4	4.7	4.3
DIY, Decorating & Gardening	4.1	4.4	4.1
Electrical	6.0	6.2	5.2
Small Household	6.6	7.0	6.3
Recording Media & Books	3.3	3.3	2.8
Chemist	4.9	5.1	4.7
Recreation	10.5	10.9	9.3
<b>Total Comparison</b>	<b>51.0</b>	<b>53.1</b>	<b>46.6</b>

2022 prices









Lidl Great Britain Ltd  
 Land at Great North Rd, Milford Haven

Table 9: Retail Turnover of Proposed Development

	Gross Internal Area (sqm)	Total Net Sales (sqm)	Convenience sales area (sqm)	Trading density (£/sqm)	Turnover 2024 (£m)	Turnover 2029 (£m)	Turnover 2029 inc. Inflow (£m)
	[1]	[2]	[3]	[4]	[5]	[6]	[6]
Existing Lidl Foodstore	2,000	917					
Proposed Lidl Foodstore	1,949	1,330					
convenience floorspace uplift		414	414	10,201	4.2	4.3	4.5
<b>Total</b>							

Notes

[2] Net sales area taken from application drawings

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

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

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

[6] turnover rolled forward to 2029 based on assumed f/s efficiency increase (0.2% conv) (EXRPBN 21 Fig 4a (Feb 2024))

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Table 10 Capacity for additional convenience floorspace to 2029

	2024	2029
[1] Available Convenience Expenditure in PCA (Zone 4) (£m)	45.6	45.4
[2] Turnover of existing stores in PCA (Zone 4) (£m)	28.7	28.7
[3] Turnover of proposed development (£m)	0.0	4.3
[4] Turnover of Convenience Retail Commitments in PCA (£m)	0.0	0.0
[5] Total PCA turnover (£m)	28.7	33.0
[6a] PCA convenience expenditure capacity (£m)	16.9	12.4
[6b] Retained market share of PCA expenditure (%)	62.9	72.6

**Notes**

[1] taken from table 4

[2] derived from table 8. Projected forward to 2024/9 on basis that facilities gain from a pro-rata growth in expenditure a:

[3] taken from table 9

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

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

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

2022 prices

Table 11: Convenience trading effects of the proposed development, 2029

	Turnover 2024		Total Turnover 2024	Turnover 2029		Total Turnover 2029	Convenience Trade Draw to Proposed Development		Residual Turnover 2029	Impact			
	Convenience	Comparison		Convenience	Comparison		%	£m		Change 2024-29		2029 Impact	
	£m	£m	£m	£m	£m	£m	%	£m	£m	%	£m	%	
	[1]	[2]	[3]	[4]	[5]	[6]	[7]		[8]	[9]	[10]	[11]	[12]
<b>Primary Catchment Area (PCA)</b>													
<b>Milford Haven Centre</b>													
One Stop, Charles Street, Milford Haven, SA73 2HA	0.2		0.24	0.2	0.0	0.24	0.5	0.02	0.22	-0.03	-10.4	-0.02	-9.8
Local shops, Milford Haven Town Centre	0.1		0.1	0.1	0.0	0.1	0.2	0.01	0.1	0.0	-10.4	-0.01	-9.8
Milford Haven TC		2.5	2.5	0.0	2.8	2.8			2.8	0.3	12.5	0.00	0.0
<b>Centre Total</b>	0.3	2.5	2.8	0.3	2.8	3.2	0.7	0.03	3.1	0.3	9.8	-0.03	-1.0
<b>Milford Haven Out of Centre</b>													
Tesco Superstore, Haven's Head Business Park, Milford Haven, SA73 3AU	19.9	3.6	23.5	19.8	4.0	23.8	42	1.89	21.9	-1.6	-6.6	-1.89	-7.9
Iceland Food Warehouse, Haven's Head Business Park, Milford Haven, SA73 3AU	2.0		2.0	2.0	0.0	2.0	4	0.16	1.8	-0.2	-8.8	-0.16	-8.3
Co-Op Food, High Street, Neyland, Milford Haven, SA73 1TF	1.4		1.4	1.4		1.4	3	0.14	1.3	-0.1	-10.4	-0.14	-9.8
Other							6						
<b>Beyond PCA</b>													
<b>Pembroke Dock Centre</b>													
Asda, Gordon Street, Pembroke Dock, SA72 6DA	11.7	0.9	12.6	11.6	1.1	12.7	2	0.10	12.6	0.0	-0.4	-0.10	-0.8
Local shops, Pembroke Dock Town Centre	0.1	11.2	11.2	0.1	12.6	12.6	0.1	0.01	12.6	1.4	12.4	-0.01	0.0
<b>Pembroke Dock Out of Centre</b>													
Lidl, Pier Road, Pembroke Dock, SA72 6TR	10.1		10.1	10.1	0.0	10.1	1	0.03	10.0	-0.1	-0.9	-0.03	-0.3
Tesco Superstore, London Road, Pembroke Dock, SA72 6DS	29.4	4.6	34.0	29.2	5.2	34.4	9	0.41	34.0	0.0	0.0	-0.41	-1.2
Aldi, Eastern Avenue, Pembroke Dock, SA72 4AA	16.4	0.6	17.0	16.3	0.7	17.0	6	0.26	16.7	-0.3	-1.6	-0.26	-1.5
Farmfoods, Pembroke Dock Retail Park, London Road, Pembroke Dock, SA72 6DT	0.6		0.6	0.6	0.0	0.6	0.4	0.02	0.6	0.0	-3.6	-0.02	-3.1
<b>Tenby Centre</b>													
Sainsbury's Superstore, Upper Park Road, Tenby, SA70 7LT	13.0	1.9	15.0	13.0	2.2	15.2	1	0.03	15.1	0.1	0.9	-0.03	-0.2
<b>Haverfordwest</b>													
Aldi, Salutation Square, Haverfordwest, SA61 2LG	1.0		1.0	1.0	0.0	1.0	2	0.09	0.9	-0.1	-9.4	-0.09	-8.9
Tesco Extra, Fenton Trading Estate, Portfield, Haverfordwest, SA61 1BU	5.8	2.5	8.3	5.8	2.8	8.6	15	0.67	7.9	-0.4	-4.7	-0.67	-7.8
Marks and Spencer (M&S), Withybush Retail Park, Haverfordwest, SA61 2PY	1.5	3.9	5.5	1.5	4.4	6.0	1	0.03	5.9	0.5	8.4	-0.03	-0.4
Morrisons Superstore, Bridge Meadow Lane, Haverfordwest, SA61 2EX	2.0	0.1	2.1	2.0	0.1	2.1	3	0.13	1.9	-0.1	-6.4	-0.13	-6.2
<b>Inflow</b>							5	0.22					
							100	4.5					

Notes

[1][2] taken from table 7/8

[3]=[1]-[2]

[4]&[5] Allowance made for turnover of existing facilities to gain from pro-rata growth in expenditure to 2027 in line with Table 4a/5a.

[6]=[4]-[5]

[7] CS estimate reflective of existing stores trading position

[8]=[6]-[7]

[9]=[8]-[3]

[10]=[8]-[3]/[3]\*100

[11]=[8]-[6]

[12]=[8]-[6]/[6]\*100

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