



Planning & Retail Statement



Client Name: Lidl Great Britain Ltd
Site Address: Land to the north of Brecon Ind. Est.,
South of A40/A470 Roundabout, Brecon
Date: October 2026



Document control

Document Version Control				
Revision No.	Project Stage (if applicable)	Prepared by	Approved by	Date Issued
1	PAC DRAFT	TF	RM	October 2026



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SECTION 1

Introduction



1.0 Introduction

1.1 Background

1.1.1 This Planning and Retail Statement (PRS) has been prepared by CarneySweeney (CS) on behalf of the applicant, Lidl Great Britain Ltd, in support of a full planning application for the erection of a retail foodstore with surface level car parking, landscaping all associated development at land at A470, Brecon.

1.1.2 The description of the proposed development is as follows:

“Erection of a Class A1 retail foodstore with surface level car parking, landscaping, and all associated drainage and engineering operations and service connections.”

1.1.3 The site lies within the Bannau Brycheiniog National Park Authority Area (BBNPA). This report focuses on the general planning and retail policy issues associated with the application proposals. It is intended to assist BBNPA in its determination of the application and has been prepared in accordance with the requirements set out in Future Wales: The National Plan 2040 and Planning Policy Wales and local National Park development plan policy.

1.1 Structure of the Report

1.1.1 The remainder of the report is structured as follows

- **Section 2: The Site and Context** - provides a detailed description of the site and the surroundings.
- **Section 3: The Proposed Development** - describes the application proposals including Lidl's Business Model.
- **Section 4: Planning Policy Context** - provides a summary of the relevant development plan policies.
- **Section 5: Assessment of Existing Retail Provision** - sets out an assessment of existing retail provision;
- **Section 6: Need for the Proposed Development** - considers the need for the proposed development;
- **Section 7: The Sequential Approach to Site Selection** - considers the application of the sequential test;
- **Section 8: Assessment of Impact** - provides an assessment of retail impact;
- **Section 9: Non-retail planning issues** - outlines non-retail planning considerations; and



- **Section 10: Conclusion** - presents our overall conclusions.



SECTION 2

The Site and Context



2.0 The Site and Context

2.1 The Application Site

- 2.1.1 The application site is a broadly triangular parcel of land measuring c.1ha located between the A470 and A40 just outside the Brecon settlement limit. The site is an undeveloped, greenfield plot of land sitting between the edge of Brecon to the north-east, Ffrwdgrech Industrial Estate to the south and Brecon Enterprise Park to the west. The site is currently served by an access/egress point off the A470. See Figure 1 below.
- 2.1.2 The site is situated approximately 1.2km from Brecon Town Centre's primary retail area and is an undeveloped, greenfield plot of land sitting between the edge of Brecon to the north-east, Ffrwdgrech Industrial Estate to the south and Brecon Enterprise Park to the west.



Figure 1 Location of the Site (outlined in red)

- 2.1.3 The site is undesignated. It is not located within a Special Landscape Area and is unaffected by any heritage designations. The nearest listed buildings are the row of houses along Ffrwdgrech Road, located approximately 300 metres to the east of the application site. There are no Air Quality Management Areas (AQMAs) within the authority area. There is one recorded Tree Preservation Order within the application site boundary.
- 2.1.4 The site is bounded by the Afon Tarell tributary to the south; the River Usk/Afon Wysg is both a statutory Site of Special Scientific Interest (SSSI) and a statutory Special Area of Conservation (SAC).
- 2.1.5 As shown on NRW's Flood Map for Planning the site lies mostly within Flood Zone 1 which is defined as having a low probability of flooding from rivers and the sea. A small watercourse runs along the



southern boundary of the site and this is bordered by areas of Flood Zone 3. There is an area of Flood Zone 2 and 3 of Surface Water and Small Watercourses in the eastern section of the site.

2.2 Planning history

2.2.1 A review of the Council's online planning history search facility shows little notable recorded planning history at the subject site:

- App ref: P16840 - Proposed Hotel and A3 Public House/Restaurant/Fast Food Outlets - Withdrawn 26th September 2000.

2.3 Pre-application Consultation

2.3.1 The application submission follows discussions with Bannau Brycheiniog National Park Authority Officers, initiated in April 2026 whereby the draft proposals were submitted to the NPA for comment.

2.3.2 A meeting was held with officers on 29 May 2026, and BBNPA's pre-application advice response was received 23 June 2026. A summary of the salient points raised is set out below:

- **Principle of development** - The Plan's retail strategy is set out in LDP Policy SP13 Retail Strategy. The proposal would represent a departure to the development plan and will be advertised as such. No Community Infrastructure Levy has been introduced in the National Park.
- **Major development** – The proposal will be considered as major development in the National Park. The policy 'tests' for considering major development proposals are set out in PPW and Policy SP2 of the LDP. Any planning application should assess the need 'tests' set out in local and national policy
- **Demonstrating need** – A proposed retail catchment is considered reasonable to establish whether there are sufficient levels of retail provision. The NPA welcome the proposed approach of commissioning a household survey of shopping patterns with a 2026 base-date.
 - **Quantitative need** - The NPA welcome a 'retail catchment' based on a 20-minute drive time and 2026 household survey of shopping patterns.
 - **Qualitative need** - The NPA requires qualitative needs assessments to deliver a balanced and impartial analysis, with any displacement effects or other negative consequences clearly identified and appropriately considered. The NPA does not consider the proposed site is currently highly accessible by walking, cycling or public transport. Major accessibility improvements, including off-site works, are needed to provide sustainable travel links from Brecon. The NPA are concerned as to how introducing retail at the site will maintain and enhance the vitality and viability of Brecon retail centre.



- **Sequential justification** – A number of suggested sites warrant investigation including Canal Road car park, and the former Brecon Boys Grammar School on Cradoc Road. Powys CC should be contacted to explore potential sequential alternatives.
- **Retail Impact Assessment** – The proposed ‘retail catchment’ includes two towns with retail centres identified in the LDP - Brecon and Talgarth. An impact assessment would be required as part of an application, primarily focussing on Brecon.
- **Design and placemaking** - The site is well screened by mature hedgerows, and the aim is to retain this screening of Ffrwydgrech Industrial Estate from the A470. The NPA welcome opportunities to explore the palette of materials used to finish the store given the site’s location.
- **Ecology, protected sites and trees** – An application should be accompanied by a foul/surface-water drainage details to enable HRA / River Usk SAC nutrient (phosphate) screening. An Appropriate Assessment may be required. An application should also be supported by a Green Infrastructure Statement, biodiversity enhancement scheme and a LEEMP with long-term management.
- **Transport** – Welsh Government Trunk Road Agency will be a consultee. Off-site provision for walking and cycling will need to be provided. Any proposal would need to balance highways requirement against the landscape impact on the hedgerows and the approach into Brecon.
- **Parking provision** – Electric vehicle parking provision should incorporate Future Wales’ requirement. The NPA considers the car park could include areas of interest, enable connectivity and assist with sustainable drainage and biodiversity.
- **Lighting** – Any external/ street/ entrance lighting should be appropriate design and sensitively located and should be shown on a Lighting Plan.
- **Archaeology** - An application should be supported by an archaeological assessment.

2.4 Statutory Planning Application Consultation

- 2.4.1 The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 (“the 2016 Order”) sets out the requirements to undertake preapplication consultation PAC) in respect of all planning applications for major development.
- 2.4.2 The submitted PAC Report details the pre-application consultation undertaken, including documenting responses to the consultation; and how feedback is addressed in the application proposals.



SECTION 3

The Proposed Development



3.0 The Proposed Development

3.1 The Application Proposals

3.1.1 The proposed development seeks to deliver a high-quality, modern foodstore that will enhance local retail provision and improve customer choice. The proposed store will be single-storey, with a gross internal area (GIA) of 2,185 sqm, and a net sales area of 1,530 sqm.

3.1.2 The scheme includes a 103-space customer car park, which will incorporate:

- 6 disabled parking bays;
- 9 parent and child spaces; and
- 2 electric vehicle (EV) charging bays.

Siting and Appearance

3.1.3 The proposed food store will be located in the eastern section of the site. The customer entrance will be located at the north-west corner of the building. 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.

Access

3.1.4 Vehicular access to the site will be provided via an enhanced vehicle access/egress point off the A470.

3.1.5 To maximise site permeability and encourage travel by non-car modes, pedestrian access points are proposed to the north of the site. This will provide convenient connections between existing active travel and public transport infrastructure and the store entrance via internal footways and crossing points.

Deliveries and Servicing

3.1.6 The service bay will be located at the southern edge of the site to facilitate efficient deliveries and minimise disruption to surrounding uses. 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.



3.3 Lidl's Operational Model

3.3.1 Lidl is now exceptionally well established in the UK with the Company operating in excess of 1,000 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.

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

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

3.3.3 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.

3.3.4 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.

3.3.5 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.

- 3.3.6 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.
- 3.3.7 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.
- 3.3.8 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.
- 3.3.9 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.
- 3.3.10 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.
- 3.3.11 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.
- 3.3.12 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.



- 3.3.13 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.
- 3.3.14 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.
- 3.3.15 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.
- 3.3.16 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.



SECTION 4

Planning Policy Context



4.0 Planning Policy Context

4.1 The Development Plan

- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.1.2 The Development Plan for this site comprises:
- Future Wales – The National Plan 2040 (published February 2021); and
 - Bannau Brycheiniog National Park Authority (BBNPA) Local Development Plan (adopted December 2013)

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

- 4.2.1 Future Wales is the Welsh Government's highest tier of development plan in Wales. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole. Under policy one of this document, 'where Wales will grow', the Welsh Government supports sustainable growth in all parts of Wales but highlights three National Growth Areas.
- 4.2.2 The Welsh Government (WG) has adopted a 'Town Centre First' approach and this is explored under Policy 6, where it is mentioned that significant new retail facilities must be located within town and city centres. Subsequently, developments of a 'significant' scale can broadly be defined as where the facility will serve a town, city or region-wide catchment. Planning authorities are encouraged to take a similar approach for smaller developments. A sequential approach must be used to inform the identification of the best location for these developments.
- 4.2.3 The supporting text of Policy 6 notes that *"This policy applies to developments of a significant scale, which can broadly be defined as where the facility will serve a town, city or region-wide catchment."*
- 4.2.4 Policy 9 'Resilient Ecological Networks and Green Infrastructure' notes the importance of enhancing ecosystems, biodiversity and green infrastructure when considering approaches to development proposals through nature-based methods.
- 4.2.5 Policy 12 'Regional Connectivity' refers to improving the connectivity in urban areas by integrating active and sustainable travel and public transport. Active travel is encouraged in all new developments in the form of walking and cycling to promote a reduction in the reliance of the private car.



4.4 Bannau Brycheiniog National Park Authority LDP (2007-2022)

- 4.4.1 The BBNPA LDP was adopted in December 2013 and covers the period up to 2022. It forms part of the statutory development plan alongside Future Wales: The National Plan 2040.
- 4.4.2 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 and lies beyond 300m of a designated retail centre in an 'out-of-centre' location. The policies of relevance to the proposed development are now discussed in further detail below.
- 4.4.3 **Policy SP1 (Appropriate Development in the National Park)** sets out the requirements for development to comply with the purposes and statutory duty of the National Park. This includes conserving and enhancing the natural beauty of the park and/or supporting the understanding and enjoyment of the special qualities of the National Park.
- 4.4.4 **Policy 1 (National Park Policy)** provides five set criteria for development within the National Park where they are relevant to the proposal:
- i. the scale, form, design, layout, density, intensity of use and use of materials will be appropriate to the surroundings and will maintain or enhance the quality and character of the Park's Natural Beauty, wildlife, cultural heritage and built environment;
 - ii. the proposed development is integrated into the landscape to the satisfaction of the NPA through planting and appropriate management of native species or through the construction of appropriate boundary features;
 - iii. the proposed development does not have an unacceptable impact on the economic, social, cultural and linguistic vitality and identity of any community, either in its own right or through cumulative impact.
 - iv. the proposed development promotes opportunities for the conservation and enhancement of bio/geodiversity through appropriate design and landscaping.
 - v. the proposed development is within 400m of an area of accessible natural greenspace.
- 4.4.5 **Policy SP2 (Major Development in the National Park – Strategic Policy)** says that major development should only be permitted in the National Park in exceptional circumstances where proven to be in the public interest. This will include an assessment of:
- a) the need for the development, including any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - b) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and



- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which these could be moderated.

4.4.6 **Policy SP3 (Environmental Protection)** - aims to ensure that all proposals for new development do not have an unacceptable impact on the environment. This is an overarching policy which links to other specific environmental protection policies detailed below.

4.4.7 Like the requirements of the associated policies, to satisfy the environmental protection strategic policy an assessment must demonstrate that there will be no unacceptable impact on, nor detract from, or prevent the enjoyment of the National Park.

4.4.8 **Policy 3 (Sites of European Importance)** - Proposals for development which may have significant effect on a European Site or potential European Site, when considered alone or in combination with other plans or projects, will not be permitted unless:

- i. the proposed development is directly connected with or necessary for the protection, enhancement and positive management of the site for conservation purposes;
- ii. the proposed development will not adversely affect the conservation objectives associated with the site or the integrity of the site;
- iii. where the site supports interests not identified as a priority habitat or species, there are imperative reasons of overriding public interest why the development should proceed;
- iv. where the site supports priority habitats and/or species, there are reasons of human health, public safety, beneficial consequences of primary importance to the environment or other grounds for overriding public interest that can satisfy the requirements as to why the development should proceed; and
- v. with respect to iii) & iv) above there is no alternative solution, and compensatory measure are secured to ensure that the overall coherence of the Natura 2000 network is protected.

4.4.9 **Policy 4 (Sites of National Importance)** - Proposals for development which may affect a National Nature Reserve or proposed or notified Site of Special Scientific Interest will only be permitted where:

- i. the proposal contributes to the protection, enhancement or positive management of the site; or
- ii. the developer proves to the satisfaction of the NPA that the proposal has no unacceptable impacts which would directly or indirectly damage the site, detrimentally affect its conservation interest or its value in terms of its designation; or
- iii. the need and reasons for the proposed development outweigh the value of the site itself; and there are no alternative means of meeting the need for the development.



- iv. Where appropriate the NPA will consider the use of Planning Conditions and/or Planning Obligations to provide appropriate mitigation and / or compensatory measures.

- 4.4.10 **Policy 5 (Sites of Importance for Nature Conversation)** explains that development affecting non-statutory wildlife, geological or geomorphological sites will only be permitted where the need for the development outweighs the site's conservation value, the proposal complies with relevant biodiversity policies (Policy 6/Policy 7), and appropriate mitigation or compensation is secured where necessary.
- 4.4.11 **Policy 6 (Biodiversity and Development)** sets out the tests for ensuring that there is no unacceptable loss or other impact of a habitat or landscape features. The National Park Authority (NPA) requires all proposals to be judged against these tests to provide biodiversity enhancement through the scheme in accordance with the direction of the Planning Obligation Strategy.
- 4.4.12 This policy requires proof to be provided that there will be no unacceptable loss or fragmentation of a habitat or feature and that habitats or features are identified for their future management. Fundamentally there should be a demonstration of biodiversity enhancement to also accord with PPW 12 (net benefit for biodiversity).
- 4.4.13 **Policy 7 (Protected and Important Wild Species)** sets out that development affecting land or buildings that support protected or important species will only be permitted where the need for the development outweighs the site's conservation value, legal requirements are met, and appropriate measures are secured to minimise impacts and conserve affected species and habitats.
- 4.4.14 **Policy 8 (Trees and Development)** relates to trees and aims to ensure all trees and their root systems are protected and that any removal must be replaced on site utilising native trees of local provenance.
- 4.4.15 Therefore, to accord with local and national policy tree removal should be limited as much as possible and where required be replaced at a ratio of 3:1.
- 4.4.16 **Policy 10 (Water Quality)** advises that development will only be permitted where it does not have an unacceptable adverse impact upon the water environment and would not pose an unacceptable risk to the quality and quantity of controlled waters.
- 4.4.17 **Policy 11 (Sustainable Use of Water)** ensures that all future development proposals consider the incorporation of the highest standards for water management.
- 4.4.18 **Policy 12 (Light Pollution)** requires a full lighting scheme to be submitted where lighting is required, which should demonstrate that there will be no significant adverse effect on the surrounding area.
- 4.4.19 **Policy 13 (Soil Quality)** requires proposals to demonstrate the sustainable use and management of soils in accordance with good practice. Development that would result in an unacceptable adverse impact on soil quality will not be permitted.



- 4.4.20 **Policy 14 (Air Quality)** permits development which does not have an unacceptable individual or cumulative impact on air quality, or where appropriate mitigation measures are provided to avoid adverse effects.
- 4.4.21 **Policy SP4 (Climate Change)** sets out the requirements which must be demonstrated to show how the proposal will address the effects of climate change.
- 4.4.22 The proposal must demonstrate how the development will be resilient and adaptable to the likely effects of climate change, limit and mitigate the causes of climate change and contribute to the aim of carbon neutrality.
- 4.4.23 **Policy 67 (Recycled, Secondary and Waste Materials)** explains that the use of recycled, secondary and waste materials will be supported where it does not harm the National Park's landscape, heritage, biodiversity, local amenity or water resources, and can be appropriately managed and restored where required.
- 4.4.24 **Policy SP10 (Sustainable Distribution of Development)** aims for development will be directed to sustainable locations close to services and facilities, supporting appropriately scaled growth that meets community needs while conserving the National Park's special qualities.
- 4.4.25 **Policy LDP ELP1 (Community Sustainability Edge of Settlement Exceptions)** lists development which is essential to community sustainability and/or have limited environmental impact will be enabled at edge of Settlement locations.
- 4.4.26 **Policy SP11 (Sustainable Design)** advises that all proposals for development are required to address the principles of sustainable design by meeting national and local requirements for sustainable design and demonstrate consideration of the application of renewable energy sources, where relevant.
- 4.4.27 **Policy SP12** states that development proposals which are aimed at improving the economic social well-being of the National Park's communities must accord be well-connected through sustainable forms of transport and comply with set conditions.
- 4.4.28 **Policy SP13 (Retail Strategy (and paragraph 7.7.3.1))** is the retail strategy which aims to protect the identified existing retail uses in the Retail Centres and maintain and enhance the diversity of uses in the Retail Centres.
- 4.4.29 To satisfy this policy the retail tests will need to be applied and shown to be favourable for the development. This is discussed in the planning considerations section below.
- 4.4.30 **Policy 52 (Welsh Language)** requires development in areas where the Welsh language is integral to community life will only be permitted where it does not adversely affect the community's social, linguistic or cultural character, and can be appropriately phased where necessary.



- 4.4.31 **Policy 53 (Planning Obligations)** sets out the Planning Obligations and Community Infrastructure Levy process. Planning Obligations apply to commercial developments of 500sqm or more. The proposal must be supported by a Planning Obligations Statement.
- 4.4.32 **Policy 58 (Sustainable Drainage Systems)** states that all proposals for new development will be required to consider the incorporation of appropriate Sustainable Drainage Systems.
- 4.4.33 **Policy SP17 (Sustainable Transport)** aims to ensure that opportunities are taken to reduce the need to travel by private car through a range of listed measures.
- 4.4.34 **Policy 59 (Impacts of Traffic)** states that development will only be permitted where appropriate access can be achieved.
- 4.4.35 **Policy SP18 (Sustainable Use of Land)** encourages all new development to make the best use of available land by using previously developed land within development boundaries in preference of Greenfield sites.
- 4.4.36 **Policy SP7 (Waste)** requires all new development to demonstrate that provision has been made for reducing the production of waste and that, the reuse and recycling of waste and safe waste disposal is facilitated.

4.5 Emerging BBNPA Local Development Plan 2025 – 2045

- 4.5.1 Bannau Brycheiniog NPA is in the early stages of preparing its Local Development Plan for the period 2025 to 2045. BBNPA consulted on its draft Delivery Agreement between 1st May to 26th June 2025. We understand the draft agreement remains in draft and is yet to be agreed with the Welsh Government.

4.6 Planning Policy Wales Edition 12 (February 2024)

- 4.6.1 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”.
- 4.6.2 Key sections relevant to the proposals include:
 - **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.

4.7 Supplementary Planning Guidance

4.7.1 The following supplementary planning guidance is of relevance:

- Biodiversity and Development (2016)
- Planning Obligation Strategy (2014) – aids implementation of Policy 53 of the BBNPA LDP.
- Landscape and Development (2014)
- Enabling Appropriate Development in the Countryside (amended in 2019)
- Obtrusive Light and Light Pollution (2015)
- Biodiversity in the Towns of the National Park (2016)
- Sustainable Development in the National Park (2015)



- 4.7.2 There is a Draft Brecon Town Plan SPG, but it is currently not adopted. The LDP Annual Monitoring Report 1st April 2024-31st March 2025 states that *“Consultation was undertaken on draft Town Centre Supplementary Planning Guidance, and a decision was taken not to introduce this”*.

4.8 Technical Advice Notes

- 4.8.1 The following technical advice notes are of relevance to this application:

- TAN 4 - Retail and Commercial Development (2016)
- TAN 5 - Nature Conservation and Planning (2009)
- TAN 12 – Design (2016)
- TAN 15 - Development, flooding and coastal erosion (2025)
- TAN 18 – Transport (2016)



SECTION 5

Assessment of existing retail provision



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 Brecon 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.
- 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 Primary Catchment Area 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 shown at **Appendix A**.

5.3 Brecon Town Centre

- 5.3.1 Brecon is a market town with an estimated population of 8,242 (2021)¹. The BBNPA identifies Brecon as a “Primary Key Settlement” within the settlement hierarchy and a “Town Centre” within the retail hierarchy. It is the “primary retail centre” out of the four retail centres in the NPA. The designated centre is primarily made up of mix of commercial premises on Lion Street, High Street, St Mary Street, the Morrisons, Y Gaer Museum, Art Gallery & Library, and Watton Road.

Retailer Representation

- 5.3.2 The number of national multiple retailers within a town centre can provide a good indication of its relative strength. Brecon town centre benefits from a range of both local independents and national multiples. National multiple retailers within the centre include; Morrisons, Coffee #1, Costa, Williams Hill, Vision Express, Mountain Warehouse and Greggs.

¹ 2021 Census for MSOA Powys 017



- 5.3.3 This offering of national multiple retailers is complemented by a strong collection of independent retailers including; La Piazza Ristorante, Chang Thai & Pan Asian Cuisine, Brecon Books, Pointy Feet, Siop Myddfai, and Coffee Box.

Diversity Of Uses

- 5.3.4 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 NPA (as commonly is the case). A breakdown of units is set out in the table below.

Table 1.0 Brecon Centre Composition of Uses Summary

Sector	March 2025		March 2026		UK Average - Oct 2025
	No.	%	No.	%	%
Convenience	19	8.88	19	8.96	9.51
Comparison	59	27.57	53	25.00	25.76
Retail Services	33	15.42	33	15.57	15.97
Leisure Services	48	22.43	46	21.70	26.83
Financial & Business	24	11.21	25	11.79	7.75
Vacant	31	14.49	36	16.98	13.97
Total	214	100	212	100	100

Source: 2025 figures Experian GOAD, 2026 figures CS surveys. UK average Exp GOAD.

- 5.3.5 The convenience sector totals 19 in March 2026, representing c.9% of the centre composition, marginally lower than the UK average (9.5%). The comparison sector in March 2026 totals 53 units, which is broadly reflective of the national average.
- 5.3.6 Similarly, the retail service sector totalled 33 units in March 2025 and March 2026, in line with the UK average. The leisure services sector totalled 48 units in March 2025, and 46 units in March 2026, representing c.22.4% and c.21.7%, slightly below the UK average (26.8%).
- 5.3.7 The financial and business services sector totalled 24 units in March 2025 and 25 units in March 2026, above the UK average. The size of the centre has remained largely static since 2025.



Vacancies

- 5.4.1 In March 2025, there were 31 identified vacant units and in March 2026 this had increased to 36 units. The vacancy rate at 17.0% is slightly higher than the UK average of 14.0%.
- 5.4.2 Vacant units are generally dispersed throughout the centre, with no particular area or street considered to be disproportionately affected. It is noted however that there are no vacant units recorded within Bethel Square. The majority of vacant units are small, with a few larger vacant units located on the periphery. Most vacant units were in good condition, albeit there were a few derelict buildings on the periphery of the town centre.

Accessibility

- 5.4.3 Brecon is not served by a train station. However, the centre is served by bus stops along Bulwark, Free Street, and Brecon Interchange providing services to surrounding neighbourhoods and wider areas including Pendre, Merthyr Tydfil, and Newtown.
- 5.4.4 Most of the pavements throughout the centre are well maintained. Some of the footways in the retail centre are narrow in places.
- 5.4.5 There are no dedicated cycle lanes, making the town centre less accessible for cyclists.
- 5.4.6 The main town centre car park is The Watton Car Park. On-street car parking is also available in the town centre. There are various edge-of-centre car parks in Brecon which are in close proximity to the town centre. The Brecon Town Place Plan promotes the Canal Road car parks as the main long stay spaces for visitors.

Pedestrian Flows

- 5.4.7 Pedestrian flows can provide a good indicator of the strength of a centre. The observed pedestrian flow was moderate to low during the weekday, mid-morning site visit(s), and the busiest area of the centre was observed to be at High Street and Bulwark Road. Pedestrian flows are typically busier on the weekend. All areas of the town centre are considered to be easily accessible on foot.

Perception of safety

- 5.4.8 Navigating the town centre on foot feels safe, owing to moderate levels of activity and a well-maintained environment. Good street lighting was observed throughout the centre and there are good levels of natural surveillance from the various uses within the site, and passive surveillance from pedestrians.

Environmental Quality

- 5.4.9 Generally, shopfronts and building facades are well maintained throughout the centre. The quality of the central area of Brecon is generally good. Bunting and soft landscaping features including planters



are noticeable which helps to lift the environmental quality. Public street furniture is somewhat lacking in areas. No notable litter issues were observed. Footways, shopfront and buildings were overall generally well maintained.

5.5 Talgarth Retail Centre

- 5.5.1 Talgarth is a historic market town located approximately 9 miles north east of Brecon. It lies at the very edge of the primary catchment area. The Brecon Beacons National Park Local Development Plan (2013) identifies Talgarth as one of the “Key Settlements” within the settlement hierarchy and a “Retail Centre” within the retail hierarchy. Talgarth retail centre primarily runs along High Street and Hay Road. The centre has a strong presence of convenience and leisure services.

Retailer Representation

- 5.5.2 Talgarth retail centre is dominated by independent retailers, which is typical of a relatively small centre. There is only one national multiple retailer within the centre boundary, namely One Stop.
- 5.5.3 Independent retailers in the centre include Claire’s Wholefoods, Primrose Pharmacy, The Strand Bookshop and Café, Pobl Bakery, The Flower Bank Talgarth, and Parry’s Ice Cream.

Diversity Of Uses

- 5.5.4 CarneySweeney has carried out an assessment of the composition of the retail centre in September 2026 based on the extent of the centre outlined in the Brecon Beacons National Park Authority Local Development Plan (2013).
- 5.5.5 The composition of units within Talgarth is set out in the table below. The figure provides a comparative view of different services within the centre against the UK average.

Table 1.1 Talgarth Centre Composition of Uses Summary

Sector	September 2026		UK Average - Oct 2025
	No.	%	%
Convenience	5	23.81	9.51
Comparison	3	14.29	25.76
Retail Services	2	9.52	15.97
Leisure Services	7	33.33	26.83
Financial & Business	1	4.76	7.75
Vacant	3	14.29	13.97
Total	21	100	100

Source: 2026 figures CS survey. UK average Experian GOAD.



5.5.6 The centre totals 21 units and the highest represented category in the centre is leisure services (33.33%), which is slightly higher than the UK average (26.83%). The convenience sector also accounts for a relatively high proportion of units (23.81%), compared with the UK average of 9.51%.

5.5.7 Comparison, retail services, and financial and business service units are below the UK average. However, this is not uncommon given the relatively small size of the centre.

Vacancies

5.5.8 During the site visit, it has been identified that there are three vacant units, which equates to 14.29% against the national average of 13.97%. The vacant rate is only 0.32% higher than the national average and does not give to undue concern.

Accessibility

5.5.9 The retail centre is easily accessible by both public transport and private vehicles. The centre is well located and can be accessed from the A479 trunk road, which connects directly to the High Street.

5.5.10 Talgarth is not served by a train station. However, the retail centre is served by the Talgarth Post Office bus stop on Hay Road. In addition, the Talgarth NatWest bus stop is located approximately 15m outside the retail centre boundary on Bronllys Road, providing services to surrounding settlements and wider destinations, including Brecon, Hay-on-Wye and Abergavenny.

5.5.11 Most pavements within the retail centre are well maintained. However, some footways are narrow in places.

5.5.12 There are no dedicated cycle lanes and cycle stands identified during the site visit, making the retail centre less accessible for cycle users.

5.5.13 The main public car park serving the retail centre is Talgarth Car Park, which provides free parking approximately 200m from the retail centre boundary, equivalent to around a two-minute walk.

Pedestrian Flows

5.5.14 In respect of pedestrian activity levels, observations indicated that pedestrian flow was low during the weekday midday site visit. The busiest area of the centre was observed to be High Street, and Hay Road, where One Stop is located.

Perception of Safety

5.5.15 Throughout the site visit, Talgarth retail centre felt safe. In terms of lighting, the centre appears to be well furnished with street lighting to help provide a safe environment at night and there is passive surveillance from pedestrians.

Environmental Quality



- 5.5.16 The retail centre is generally tidy and well maintained. Public benches, picnic benches, and outdoor seating are located throughout the centre, creating a welcoming environment. Soft landscaping features are also present throughout the centre, enhancing the overall quality and amenity of the public realm. There are no significant issues relating to litter or graffiti. Overall, the environmental quality of the centre is considered to be good.

5.6 Summary

- 5.6.1 In summary, Brecon town centre appears to be in good health, is easily accessible via private transport and buses and is perceived to be a safe, well maintained shopping environment. The centre exhibits a strong mix of uses, with a strong retail offer. The centre vacancy rate is not at a level to give undue concern. Similarly, Talgarth centre also is assessed to be in good health. It is easily accessible, perceived to be a safe, and assessed as vital and viable in serving its local function.



SECTION 6

Retail Need



6.0 Retail Need

6.1 Introduction

- 6.1.1 This section of the report assesses the retail 'need' for the development, in accordance with guidance provided in PPW, TAN 4 and the adopted LDP.
- 6.1.2 The Welsh Government does not prescribe any particular methodology for undertaking need assessments, and it is up to each local planning authority to be satisfied with quantitative retail need evidence in policy making or the development management process. Local planning authorities and developers should therefore ensure assessments are prepared in a clear, logical and transparent way with the use of robust and realistic evidence. (para 6.3, TAN4).
- 6.1.3 There are two acknowledged indicators of need: quantitative need – a statistical/numerical based assessment of need for additional floorspace; and qualitative need – an assessment of other nonnumerical considerations. Qualitative considerations can include (but are not limited to) addressing issues associated with overtrading, improving accessibility, widening choice of facilities and the redistribution of trade. Weight given to qualitative need is dependent on local circumstances.
- 6.1.4 Whilst an element of precedence is apportioned to quantitative need in PPW, it states that qualitative need and other factors are material considerations when considering need, with the weight apportioned being a matter for the decision-maker in each individual case. It is within the gift of the decision maker to apportion weight to qualitative indicators of need and other material considerations.
- 6.1.5 PPW guidance states evidence should demonstrate whether retail provision is adequate or not, by assessing if there is further expenditure capacity in a catchment area (quantitative need) or if there is a lack of retail quality, range of goods or accessibility (qualitative need). (Paragraph 4.3.13).

6.2 Quantitative Capacity

- 6.2.1 The below table provides simple convenience benchmark capacity analysis within the PCA to understand local capacity or 'need' for additional convenience provision. The detailed tables are provided in **Appendix C** of this Statement. A summary is provided below.



Table 1.2: Capacity for additional convenience floorspace at 2026

	2026
[1] Available Convenience Expenditure in PCA	£61.7m
[2] Survey derived turnover of stores in PCA	£54.7m
[3] Turnover of Convenience Retail Commitments in PCA	0.0
[4] Total PCA turnover	£54.7m
[5] PCA convenience expenditure capacity	£7.0m

Notes:

[1] Taken from table 4a Appendix C

[2] Table 7 Appendix C

[3] no commitments

[4] table 9 Appendix C

[5] = [1]-[4]

6.2.2 The above table shows that of the available expenditure in the PCA (£61.7m), c. £54.7m is spent within the PCA, with around c. £7.0m of expenditure 'headroom' available to support additional local convenience provision. There is therefore quantitative capacity to support additional local convenience provision in the PCA.

6.2.3 The following table looks more closely at local provision and where available expenditure is currently being spent.

Table 1.3: Benchmark capacity assessment, main foodstores, Brecon 2026

	Convenience Net Sales Area (sqm)	Convenience Benchmark Sales Density (£/sqm)	Benchmark Turnover (£m)	Survey Derived Turnover inc. inflow	Over/under Trading +/- (£m)
	[1]	[2]	[3]	[4]	[5]
Co-op, Lion Street	850	11,226	9.5	5.9	-3.7
Morrisons, Free Street	1,802	10,555	19.0	27.4	8.3
Aldi, The Watton	1,246	11,425	14.2	20.1	5.9
Benchmark capacity					+£10.6m

Notes:

[1] IGD/app drawings

[2] GlobalData

[3] = [1]x[2]/1mil

[4] table 7 App C inc. inflow at 10%

[5] = [4]-[3]

6.2.4 The above tables shows an assessment of the trading position of existing main foodstores in Brecon. Brecon is currently principally served by three main foodstores for main food shopping, as shown above. When the trading position of these stores is assessed against the company benchmarks, it shows existing local provision is 'overtrading'; that is, trading well inc. excess of the overall company benchmark positions. This provides insight into the adequacy of local provision to serve local needs.



6.2.5 Coop is trading below its company benchmark. However, most notably, Morrisons and Aldi are 'overtrading' by c. £14.2m leading to an overall overtrade of existing provision of c.10.6m². The convenience turnover of the proposed store is c.£10.1m (Table 9, Appendix C). This demonstrates there is full local convenience expenditure benchmark capacity to support the proposed store. Indeed, Morrisons is overtrading by c. 43%; Aldi is overtrading by c. 42% against benchmark company performance. This is evidence of a deficit in existing provision. The provision of additional convenience provision will 'decongest' these stores and increase local choice and competition. PPW paragraph 4.3.16 makes clear the alleviation of over-trading is an important need consideration. Based on the above analysis, quantitative need for the additional convenience provision is demonstrated.

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. We consider PPW paragraph 4.3.16 below, which states:

"Qualitative assessment should cover both positive and negative aspects and may become an important consideration where it:

- supports the objectives and retail strategy of an adopted development plan or the policies in this guidance;

6.3.3 The Proposed Development supports the settlement hierarchy and retail hierarchy of the adopted development plan by seeking to focus growth to Brecon which is the principal retail settlement in the National Park Authority area and the PCA the development is intended to serve, at a sequentially preferable location (this is considered further in the following section).

- is highly accessible by walking, cycling or public transport;

6.3.4 This is considered in detail in the accompanying Transport Assessment.

6.3.5 The site is demonstrably accessible by non-car modes of transport with cycle parking provision proposed, physical Active Travel works proposed through highways improvements and the applicant agreeable to planning obligation towards Active Travel improvements to further enhance the accessibility of the site.

² 10% allowance for non-resident spend i.e. inflow



- contributes to a substantial reduction in car journeys;

6.3.6 This is considered in detail in the Transport Assessment and Travel Plan submitted with the application.

6.3.7 As outlined above, the quantitative need assessment shows around £7.0m of available expenditure is lost or 'leaked' to other destinations beyond the PCA. The overwhelming majority of food shoppers travel by car to carry out food shopping³; thus, leakage of expenditure causes eminently avoidable traffic. Many shoppers carry out main food shopping by way of a dedicated trip. The issues associated with a deficit of local choice is that overtrading (identified above) and 'leakage' of expenditure can continue unabated. By counteracting leakage (and overtrading) through improved local provision, a reduction in unnecessary car journey may be achieved and Brecon's self-containment can be increased, in accordance with wider PPW placemaking objectives.

- contributes to the co-location of facilities in existing retail and commercial centres;

6.3.8 This refers to the 'clustering' of different uses and services i.e. retail, commercial, leisure, health, education, public services, food and drink, etc. within easy, accessible distances of one another, focused on centres. The co-location of uses and accessibility to these uses by a range of transport options promotes sustainability in placemaking terms.

6.3.9 The proposed development is 'co-located' with other existing commercial uses surrounding, sited as it is between two industrial/commercial estates. Whilst these uses are not in a centre, the site is demonstrated to be at a sequentially preferable location (this considered further below). Active Travel works and planning obligations will promote and encourage linked trips with other commercial uses in centre on foot/bike or by improved public transport.

- significantly contributes to the vibrancy, attractiveness and viability of such a centre;

6.3.10 The effect on trading patterns on in centre foodstore operators is assessed at Section 8.0. However, the premise that out of centre stores has a wholly negative impact on town centre shopping is misplaced; the position is far more nuanced.

6.3.11 Brecon's convenience offer is already supplemented by an established out-of-centre discount foodstore (Aldi), and the health check at Section 5.0 demonstrates the centre remains vital and viable alongside it. The vitality of Brecon centre is driven principally by its comparison, service, leisure and visitor offer rather than by main food shopping: convenience units account for c.9% of the centre's composition, in line with the national average, and the in-centre Morrisons store is trading c.43% above its company benchmark. Lidl's deliberately limited assortment, and the absence of in-store services such as a pharmacy, post office or delicatessen (see Section 3.2), mean the proposed store

³ Question 05, NEMS household survey



does not replicate the breadth of goods and services available in the centre. Shoppers will therefore continue to rely on Brecon centre for top-up, specialist food and non-food shopping and services.

- 6.3.12 Retaining increased convenience expenditure locally should help to offset trade diversion from centre stores. With local choice improved more shoppers may be in Brecon, and the wider centre services should benefit through linked trips. Brecon is well served by a good mix of other retail/service uses. The purposefully limited assortment discount offer provided by the applicant (and absence of a fixed range of comparison goods) increases the propensity for shoppers to frequent Brecon centre for other food and non-food shopping and its retail/leisure services. We therefore anticipated the store having a 'symbiotic' relationship with the wider centre. This can be further encouraged by way of planning obligations to enhance the vibrancy and attractiveness of the centre through Planning Obligations toward e.g. public realm improvements and public art etc.

- assists in the alleviation of over-trading of, or traffic congestion surrounding, existing local comparable stores;

- 6.3.13 Sales density is a measure of retail productivity, expressed as turnover per square metre of sales floorspace (£/sqm). It tells you how much turnover a retailer generates from each square metre of their store.
- 6.3.14 As discussed and identified above, stores 'over-trading'; that is, trading in excess of company benchmark sales densities can indicate both: a) a congested store and/or b) a general deficit of local choice/provision.
- 6.3.15 Brecon's two principal foodstores are performing c.40% above the benchmark."⁴ We consider the third, Coop, is performing less well as it is being outcompeted in value terms (i.e. it is uncompetitive on price, despite it's favourable location). The assessment finds overall overtrading in the designated centre.
- 6.3.16 Qualitative problems associated with overtrading can include, but are not limited to, parking and wider highway safety issues, staff pressures i.e. being overstretched, poor customer experience/service including long queues at checkouts; stock availability issues – replenishment issues/ empty shelves, reduced product range and fresh produce running out early; and drops in operational standards, with a rise in health and safety risks (e.g. replenishment at peak periods and blocked aisles). Waste management and back of house management can also become more challenging etc.
- 6.3.17 All existing stores occupy very advantageous locations and are served by dedicated parking. The site visits during the healthcheck assessment of the existing centre, detailed in Section 4.0, highlighted existing stores are well maintained and overall appear to be trading strongly. Coop's food shopping is

⁴ Paragraph 5.25



supplemented by concessionary services – this drives visits to the store for reasons other than solely food shopping.

- 6.3.18 The Proposed Development will help alleviate local overtrading in accordance with PPW qualitative need considerations. The trading effects of the proposed store are considered in Section 8.0 below.

- addresses locally defined deficiencies in provision in terms of quality and quantity, including that which would serve new residential developments; and - alleviates a lack of convenience goods provision in a disadvantaged area.”

- 6.3.19 In terms of locally defined deficiencies, Table 1.3 shows the PCA’s two principal main-food stores trading c.42–43% above company benchmark, while c.£7.0m of convenience expenditure currently leaks from the PCA. Brecon is served by only one limited assortment discount operator, and the nearest Lidl store is over 20km away at Merthyr Tydfil. This represents a deficiency in both the quantity and the choice of main-food provision locally, which the proposal would directly address.

- 6.3.20 The Welsh Index of Multiple Deprivation (WIMD) 2019 ranks small areas in Wales (Lower Super Output Areas, or LSOAs). For Brecon, the WIMD shows while the town is generally affluent, it faces specific pockets of deprivation—particularly regarding rural access to services. Because it is situated in rural Powys, households face higher travel times for daily essentials like large food shops. Existing provision is inadequate and a further discount foodstore would improve access to affordable, good-quality food for price-conscious households across the PCA, consistent with PPW’s healthy lifestyles objectives (paragraphs 3.20–3.22).

- 6.3.21 With reference to TAN4 objectives the Proposed Development will counteract unsustainable shopping and in doing so address “social and environmental objectives”, “reduce car dependency” and address “locally defined deficiency”.

Increase in Local Employment

- 6.3.22 The proposed foodstore will generate up to 40 jobs with a combination of full and part time roles; the aim of which is for c.80% of which to be employed from the immediate surrounding area. The proposal therefore provides a strong economic benefit for the local economy and jobs market in Brecon, as well as surrounding areas.

- 6.3.23 In addition to 40 direct jobs, significantly more indirect jobs will be provided by the development. These could include construction jobs as the store is built; delivery driving jobs to serve the store once operational; and warehouse jobs at Lidl’s regional warehouse. Lidl currently pay a retail industry leading wage. This benefit is also particularly important in the local context, where relatively high local unemployment levels persist given the rural locale.



6.4 Summary

- 6.4.1 Quantitative and qualitative need for the proposed development has been demonstrated. Improved retail provision will help improve settlement self-containment, local choice and competition and counteract local overtrading in accordance with PPW's sustainable development principles and placemaking objectives.
- 6.4.2 Accordingly, in respect of PPW guidance, need for the proposed development has been demonstrated.



SECTION 7

The Sequential Approach



7.0 The Sequential Approach

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 PPW 12. In summary, the sequential approach requires that all potential suitable and available town centre options, and then edge of centre options, are thoroughly assessed before out-of-centre sites are considered for key town centre uses. The approach requires pragmatism and flexibility from local planning authorities, developers and retailers alike. The onus of proof that more central sites have been thoroughly assessed rests with the developer.
- 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.
- 7.1.4 The sequential assessment follows pre-application consultation with BBNPA in respect of potential sequential sites requiring investigation, and pre-application enquiries with Powys County Council to identify sequential sites.

7.2 Status of the Application Site

- 7.2.1 The site lies 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 Lakes⁵, 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 appeal⁶ the SoS endorsed the Inspector’s conclusion that the NPPF does not require disaggregation. This sets a baseline position where the SoS has decided disaggregation does not apply.

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

⁵ APP/G2815/V/12/2190175 - LXB RP (Rushden) Limited v East Northamptonshire Council, June 2014

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



amount of car parking, tailoring these to fit the local circumstances. Rather than propose developments with a mixture of large-scale retail and/or leisure uses and a large amount of car parking which can only be accommodated at single site out-of-centre or even out-of-town locations, developers are expected to demonstrate why they could not develop elements of the larger scheme on a site, or a number of sites, in more central locations with less car parking.”

- 7.3.9 This wording, which required disaggregation of elements of the scheme onto multiple sites was removed from PPW. Policy in Wales, therefore, does not require demonstration of a disaggregated approach (consistent with England and recent case law). It is clear, therefore, that disaggregation is not a policy requirement. In any event, given that the underlying premise of this application is to provide a weekly main-food-shop foodstore 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 minimum site size of circa 0.5ha;
- A minimum net floorspace of c.1,500sqm on a single level. There is no prospect for disaggregation in this instance;
- A site that is able to offer approximately 100 adjacent surface level parking spaces, so that customers can easily transfer goods to their vehicles. To have otherwise would severely impact the appeal and viability of the store;
- A site that can allow for the safe manoeuvring of customer vehicles and delivery vehicles on site;
- A prominent site with the ability to attract passing trade;
- A site that is easily accessible by a choice of means of transport; and
- Provision of a dedicated service area to the rear of the store, including the ability to accommodate HGVs (Heavy Goods Vehicles).

- 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 Bannau Brycheiniog National Park LDP proposals map shows the Retail Centre of Brecon.

7.5 Definition of Availability

- 7.5.1 Any sequential site needs to be available or expected to be available within a reasonable period.
- 7.5.2 If there is any uncertainty on a site coming forward for development, for example, there are practical/feasibility/viability issues to resolve or investment/occupier interest or funding is still to be secured, then a site cannot reasonably be considered to be available. If a potential alternative site does not satisfy the availability test it is not sequentially preferable.
- 7.5.3 Subject to securing permission and discharge of planning conditions the proposed development could be implemented immediately. Accordingly, for a potential alternative site being considered available in the context of the subject proposals it must be available in a timeframe that could allow a scheme to be implemented immediately. In this instance, anything beyond 3 months is not considered to be a “reasonable period”.

7.6 Sequential Site Search

- 7.6.1 The assessment is based on research undertaken by CarneySweeney, including pre-application consultation with both BBNPA and Powys County Council to highlight potential sites to investigate, and site visits to Brecon centre and its immediate surrounds. This process has included:
- an analysis of adopted development plan policy documents; and
 - a review of potential town centre and edge-of-centre sites/units.
- 7.6.2 The sequential assessment focusses on the following:
- Brecon Town Centre and Edge of Centre Sites
 - The allocated employment and mixed-use sites.

7.7 Assessment of Alternative Sites

- 7.7.1 The BBNPA Local Development Plan includes four mixed use allocations:
- Proposed extension to T9 (allocated for housing) (0.5ha) and new primary school (0.56ha), Talgarth
 - UDP allocation B17 Opposite High School, North of Hospital (site allocated for housing (4.55ha) and employment (0.5ha));
 - Former Army Camp, Cwrt-y-Gollen (site allocated for housing (3.7ha), employment (1.4ha), remainder to comprise of community facilities and open space provision); and



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- Former Mid Wales Hospital (allocated for housing, employment and community use).



Proposed extension to T9, Talgarth

- 7.7.2 This irregular shaped site is located within the settlement of Talgarth and is approximately 15.4km away from Brecon Centre. The site is allocated for a proposed extension to a housing site (0.5ha of housing) and for a new primary school (1.56ha). The school allocation has been built out (Ysgol y Mynydd Du). The housing allocation was granted permission in July 2018, subject to the Section 106 Agreement. The site lies in Talgarth and is not considered sequentially preferable to the application site to serve Brecon. Accordingly, it has been discounted.

UDP allocation B17 Opposite High School, North of Hospital

- 7.7.3 This irregular shaped site lies within Brecon and is c.375m away from the town centre. The site is allocated for 4.55ha of housing and 0.5ha of employment. We understand this allocation is currently being delivered in accordance with its planning permission. Accordingly, the site has been discounted.

Former Mid Wales Hospital

- 7.7.4 This allocation lies to the south-east of Talgarth, approximately 15.6km from Brecon Centre. It is not considered to be sequentially preferable to the application site.
- 7.7.5 An outline application was for the redevelopment of Cwrt Y Gollen Training Centre was approved in 2017. A section 73 application was to extend the period of time for the commencement of development and for submission of reserved matters was approved in March 2025. The allocation is understood to be unavailable and being delivered in accordance with its planning permission. The site is considered unsuitable and unavailable and has been discounted.

Brecon Enterprise Park (Warren Road)

- 7.7.6 This site measures c.0.8ha. We understand allocation DBR BR E1 has been delivered for a new Powys County Council employment building. The site lies further away from the town centre than the proposed application site and is not considered sequentially preferable. The site is unsuitable and unavailable and has been discounted.



Brecon Town Centre Vacant Units

Table 1.4: Vacant Sequentially Assessed Sites, Brecon

Address	Previous Use (If known)	Size (sq.m)	Commentary
8, 98, 104 The Struet	Shop	<150sqm	The vacant units are all too small to accommodate a Lidl food store even when allowing for flexibility. The units are unsuitable and discounted.
Chapel Street LD3 7PE	Unknown	c.137	
4, 5 Castle Street	Commercial	<35sqm	
High Street	Restaurant	c.71	
5, 18, 22, 28, 38 High Street	Commercial	<500sqm	
Bell Lane LD3 9EE	Unknown	c.94	
Bell Lane LD3 9EE	Takeaway	c.24	
Ship Street LD3 9AE	Unknown	c.633	
13-15 Lion Street LD3 7HY	Shop	c.65	
Lion Street LD3 7HY	Office	c.76	
Lion Street LD3 7HY	Cafe	c.65	
4A, 11 Lion Yard	Commercial	<70sqm	
Lion Yard LD3 7BA	Beauty studio	c.79	
1, 6A, 9, 12A Bulwark LD3 7LB	Art gallery	<200sqm	
Free Street LD3 7BL	Unknown	c.34	
30 Free Street LD3 7BL	Office	c.33	
The Watton LD3 7EG	Pub	c.141	
43, 5A, 3 Rich Way	Unknown	<70sqm	
11 Glamorgan Street LD3 7DW	Unknown	c.133	
Glamorgan Street LD3 7DW	Unknown	c.52	
3 Wheat Street LD3 7DG	Dentist	c.32	
15 Ship Street LD3 9AD	Shop	c.73	
Market Street LD3 9AH	Unknown	c.65	
21 Ship Street LD3 9AD	Shop	c.67	

- 7.7.7 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 Brecon Town 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.
- 7.7.8 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.



Additional sites considered

Unit B, Ffrwdgrech Industrial Estate

- 7.7.9 Unit B, Ffrwdgrech Industrial Estate is currently for sale. It comprises a detached, industrial building of masonry construction with a yard and parking. The site area is approximately 0.5ha. The site lies further away from the town centre than the proposed site and is not considered sequentially preferable. The site's location within the industrial estate lacks the commercial prominence required and is not suitable. Therefore, this site has been discounted.

Former Rodell Chimneys Ltd, Engineering Workshop, Ffrwdgrech Industrial Estate

- 7.7.10 The site measures 0.29ha and is occupied by a vacant industrial unit comprising a detached, workshop building of steel frame, with an open yard to the front and side. The existing property measures c.906sqm GIA. The site is too small to accommodate the proposed development, allowing for flexibility. The site is further away from the town centre and lacks the commercial prominence required. It is therefore not considered suitable and has been discounted.

7.8 Conclusion

- 7.8.1 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.
- 7.8.2 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.



SECTION 8

Assessment of Impact



8.0 Assessment of Impact

8.1 Introduction

- 8.1.1 This section of the report considers the potential trading effects of the proposals in respect of the anticipated diversion of retail trade to the proposed foodstore, with particular regard to Brecon 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. At 2,185 sqm gross the store is under the threshold whereby impact assessments are typically sought. Notwithstanding this, following pre-application discussions with the LPA and in the interests of robustness, this section provides a proportionate impact assessment. In accordance with PPW and Policy SP2 a Retail Impact Assessment has been undertaken.
- 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 shown at Appendix A; this is the area in which the proposed development will draw the majority of its trade. Impact is assessed up to five years from the time of the application being made (base year). The design year of 2031 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 2024 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 There are 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 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 £10.4m in 2031. It is assessed that a modest 10% of the proposed development's turnover would be drawn from non-resident spend i.e. inflow which, given the level of visitor spend in Brecon as a very popular tourist destination 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 2031.
- 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 expenditure is expected to remain broadly constant to 2031 and comparison expenditure is expected to grow (c.11%).
- 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.

Trading Assessment

- 8.6.8 This section of the statement considers the potential impact that the proposal may have on the pattern of retail expenditure in the surrounding area.
- 8.6.9 Set out at Table 14 of Appendix C is an assessment of how the development will affect the projected retail turnovers of facilities within the surrounding area.



- 8.6.10 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 (2026 (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 2031 (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 2031; and
 - The percentage change in retail turnover in each store/centre between 2026 to 2031.
- 8.6.11 The analysis is based on an assessment of existing stores/centre turnovers derived from the newly commissioned household survey underpinning the assessment.
- 8.6.12 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 14 considers the overall impact on Brecon centre having regard to non-food comparison turnover.
- 8.6.13 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 and store market penetration (as outlined in Table 7 and Table 13).
- 8.6.14 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.
- 8.6.15 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

8.6.16 Two measures of retail impact are set out in Appendix C:

- The change in turnover of centres in the period 2026-2031 following the development of the proposal; and
- The impact of the proposal on the calculated 2031 turnover of centres/stores.

8.6.17 The key changes following the development of the proposal between 2026-31 is that there will be a diversion of trade and consequential decreases in turnover achieved at surrounding stores within the period to 2031. However, Table 14 highlights that the catchment area is predominantly served for main food shopping by large foodstores which, broadly speaking, are trading strongly, as outlined in Section 6.0 above. The main offer in Brecon is provided by Morrisons (in-centre) and Aldi (out of centre) – these stores are ‘overtrading’ by a combined c.£14m. The proposed development will draw the majority of trade from these stores (c.70%). Notwithstanding this, the assessment finds they will continue to trade strongly.

8.6.18 Table 14 at Appendix C demonstrates the effects of the proposed foodstore is anticipated to be predominantly felt by these large and/or comparably scaled foodstores, which are well equipped to absorb the trading effects.

8.6.19 It should also be recalled that PCA population and comparison expenditure will grow in the period to 2031 which will help offset or mitigate the impact arising from trade diversion to the proposed foodstore over the same period.

8.6.20 Having regard to the role, function, and vitality and viability of the existing centre, the assessed levels of impact is not considered to be significantly adverse. In respect of impact on out of centre facilities (e.g. Aldi at Rich Way), as outlined, these derive no protection from the planning system and need not be considered in further detail. Irrespective, as demonstrated their trading position is such that they are well equipped to absorb the assessed trade diversion.

8.6.21 Indeed, given the trading overlap it is assessed that the proposed Lidl store will compete most directly with the existing Aldi foodstore at The Watton, Rich Way. It is well known Lidl and Aldi are direct competitors; they employ a very similar trading format, stock a very similar range of items and serve a very similar customer base. Put simply, shoppers most attracted to Aldi’s offer are, invariably, similarly attracted to Lidl’s offer, given this similarity. As outlined above, Aldi is overtrading by over 40%; the delivery of a second discount foodstore in Brecon will decongest the existing Aldi store. The Aldi store is out of centre and not protected in retail policy terms, but nevertheless trading as strongly as it is, is clearly well positioned to absorb this trading effect. Morrisons, Free Street, is a large, prime-located, popular store with a competing discount range as part of its wider offer and accordingly, the proposed store is also anticipated to compete with this store. The store is also overtrading by over 40% and is equally well placed to absorb the assessed trading effect.



8.6.22 The proposed store is anticipated to have a far more modest effect on the Co-op store at Lion Street. It is important to note the following:

- Brecon is already served by an Aldi discount foodstore – this store is very popular (it is significantly overtrading);
- The Coop, Lion Street store does not offer discount retail. A basket shop price comparison analysis carried out by CS shows the Coop store to be c. 50%⁷ more expensive than Lidl across a broad range of typical food items.

The Coop is not disadvantaged by location, the opposite is true, and it is served by its own car park. Despite its favourable location the Coop store is seemingly less popular than Aldi and Morrisons; it serves a differently motivated, less cost-conscious profile of local shopper. Simply put, and noting the clear disparity in local pricing currently, if Coop's shoppers were motivated by more competitively priced food retail they would already be shopping in Aldi (or Morrisons). With Coop's existing customer base not currently choosing limited assortment discount (LAD) food retail, they are equally not likely to divert to a Lidl store, given the LAD price and range is not a key determinant for their current choice of operator.

8.6.23 It is clear with Aldi in Brecon (and trading 40% above benchmark level) the effects of the introduction of the discount format to the local retail shopping environment has already been 'felt'. As such trading effects associated with the Coop and town centre are assessed to be far more modest. The less popular Coop store will continue to trade below benchmark level, primarily owing to its current price uncompetitiveness. It is not the role of the planning system to protect individual, uncompetitive retailers; rather, ensure no undue impact on the centre overall. Improved local choice and competition is to the direct benefit of local consumers and advocated in policy terms.

8.6.24 Lidl's continued focus is on 'discount' which appeals to price conscious shoppers. Lidl is competitive on pricing across all its range; the basket shop comparison analysis demonstrates this. Lidl's recent success in published surveys, for example, in food and wine, does not mean it has changed its seeks to change its customer base; there remains a keen focus on its limited range and highly competitive pricing.

8.6.25 The prevailing Secretary of State authority guides that it is crucially important the effect on the vitality and viability of the town centre as a whole needs to be assessed, **not on specific retailers or sub-sectors**. In the Secretary of State decision at Tollgate West⁸ in Essex the Inspector stated, at paragraph 12.4.5 of the report: "The assessment must be made against the town centre as a whole"; moreover,

⁷ Prices accurate at September 2026

⁸ APP/A1530/W/16/3147039



regard must be paid to “local circumstances” in considering what constitutes ‘significant adverse impact’.

- 8.6.26 The foregoing analysis documented in detail in Section 5.0 above, demonstrates the overall health of the centre is strong; indeed, it is not reliant on a single Coop foodstore. In reaching this view, we have given consideration to:
- The high number of commercial units at the centre, many of which are independents;
 - The vacancy rate which does not cause undue concern (it is not entrenched);
 - Non-food retail uses at the centre have a strong appeal and support substantial levels of footfall;
 - The very strong tourist offer and Brecon’s uniqueness as a visitor destination;
 - The high visibility and renown of the centre;
 - The popular, strongly trading Morrisons store; and
 - The Coop foodstore does not ‘anchor’ the centre.
- 8.6.27 There is no evidence, that Brecon centre is vulnerable, fragile or failing. Our assessment finds the centre to be vital and viable.
- 8.6.28 Brecon centre is dominated by comparison and service operators the majority of which are independents. Whilst an important component, the centre is not unduly reliant food operators. The town centre is more than its constituent parts. The town centre health check finds food retailing only comprises around 9% of the centre composition – in line with the national average. The centre provides an attractive retail destination with a high standard of environmental quality and benefits from a diverse range of retail operators.
- 8.6.29 The identified overall quantitative impact of c.-7% outlined at Table 14 in Appendix C cannot reasonably be considered to be “significantly adverse”.
- 8.6.30 The evidence suggests any loss of linked trips to the centre must be weighed against the potential for increase retention in expenditure through improved local choice and competition. Residents and visitors alike will still need to visit the town centre to meet their wider commercial needs. We do not anticipate that there will be any significantly adverse reduction in the vitality of the centre arising from the loss of linked trips related to the proposal.
- 8.6.31 The development constitutes crucial local investment at what is concluded to be a sequentially preferable site. In respect of local investment, Lidl was the first retailer to work with Pembrokeshire Creamery and sell milk that has been both produced and bottled in Wales and it became the first supermarket to achieve the prestigious Cynrig Cymraeg certification to protect and promote the Welsh Language, with bilingual signage and announcements across all stores in Wales. Lidl was also



the first UK supermarket to provide a Living Wage in 2015 and now offers some of the highest entry wages in the sector.

- 8.6.32 As outlined at Appendix D, in 2024, as part of its expansion in the UK, Lidl invested £474m in developing new stores and distribution centres, creating new jobs, supporting local suppliers and boosting local economies. Also in 2024, Lidl GB invested £5.8bn in British food and farmed products, with around two-thirds of products sourced directly from GB-based suppliers. Over the next five years, Lidl has committed to investing a further £30bn in British food and farming. Lidl has signed the NFU Fruit and Veg Pledge and the Back British Farming charter. All of Lidl's British fresh meat, dairy and fruit and veg is Red Tractor Assured.
- 8.6.33 It has been demonstrated the town centre is vital and viable and while convenience shopping provision is important for shoppers, it has been demonstrated existing provision is resilient and the wider centre is sufficiently diverse and healthy to withstand the level of trading diversion assessed. The proposal will materially improve local convenience shopping provision at a sequentially preferable site. There is no evidence the development will impact investment, on the contrary, the development is local investment.
- 8.6.34 When assessing impact regard must always be paid to local circumstances meaning comparisons with other centres are made with caution. Notwithstanding this, we reiterate relevant appeal decisions where Inspectors, in allowing appeals, have concluded that notably higher assessed levels of impact are not considered significantly adverse:
- In the called in Scotch Corner decision for a designer outlet centre (PINS ref: APP/V2723/V15/3132873 and APP/V2723/V16/3143678) the Inspector noted vacancy rates in Darlington Town Centre had increased from 12.6% in 2013 to 14.0% in 2016 whilst over the same period the national vacancy rate had fallen by 0.3% and the proportion of vacant floorspace in 2016 in the town centre was 11.2%, some 2% above the national average (para 11.26 of the Report to the SoS). In the same paragraph, the Inspector noted that "considerable care has to be exercised when interpreting figures such as the level of vacant units. It is acknowledged that vacant units will be found in even the strongest town centres as it is expected that there is some churn in the market, with units changing representation and that vacancies can occur because some units are no longer suited to modern retail requirements." The Inspector determined that even assuming a conservative estimate of impact (i.e. the highest impact/worst case, which was 6.9% - para 5.62 of the Report to the SoS) the impact on the centre was considered not likely to be significantly adverse.
 - In the Gillingham decision for a new Aldi foodstore (PINS ref: APP/N1215/W/18/3195092), the assessed impact figures are summarised at para 37 – the Council estimated impact of 11.3% on the town centre, with 12.9% convenience impact. The Inspector concluded that even assuming



the higher Council impact figures the evidence did not demonstrate that the impact on the convenience offer in the town centre would be significant (para 38).

- In the appeal decision relating to a mixed-use development including a supermarket in Shipston-on-Stour (PINS ref. APP/J3720/A/13/2194850), the Inspector found evidence that some independents in the Shipston Town Centre were underperforming and some evidence of churn in units. The estimated impact on the vitality and viability of the town centre as a whole ranged from 40% (the appellant's estimate) to 52% (a Rule 6's estimate) (para 31). The Inspector acknowledged this was a substantial impact, but the consequences of this were not such as should cause the appeal to be dismissed. Overall, the Inspector concluded proposal would not harm the vitality and viability of Shipston town centre (para 42).
- In the Long Eaton appeal decision for a Lidl foodstore and a DIY retail unit (PINS ref: APP/N1025/W/20/3251415) the appellant presented evidence showing the proposed foodstore would have a solus convenience goods impact of some 9.5% and an overall trade diversion of some 2.1% on Long Eaton Town Centre – summarised at para 13. Notwithstanding clear disagreement between the appellant and local planning authority on fragility of the town centre the Inspector concluded the proposal would not materially affect the vitality and viability of the town centre (para 25).

8.6.35 In the context of PPW the assessment has considered both positive and negative trading effects. It finds negative effects will not be significantly adverse these should be outweighed by the associated planning benefits of improved local provision.

8.6.36 Lastly, it is important to recall the Zurich High Court case which confirms that the any perceived failure of the retail impact tests, is just one consideration which the National Park Authority should balance against other considerations, to see whether or not it is outweighed by other such considerations. The retail impact test here is just one consideration.

8.7 Summary

8.7.1 Based on the foregoing additional analysis it has been demonstrated the proposed development will not result in unacceptable effects on Brecon centre. Trading effects must be weighed against the positive benefits of the development. In respect to policy SP13 of the LDP there is no evidence to indicate the proposal would either individually or cumulatively with other recent or proposed consented developments have an unacceptable adverse impact on Brecon centre.

8.7.2 Overall, given the proposal's modest scale, the centre's health, the wider commercial provision within the town centre, the trading strength and resilience of existing operators, the evidence suggests the retail impact of the proposal is acceptable. The effects of the proposals must be weighed against the associated planning benefits of improved local provision and local investment and job creation.



CARNEYSWEENEY



SECTION 9

Other Principal Planning Considerations



9.0 Other Principal Planning Considerations

9.1 Introduction

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

- Principle of Development
- Sustainability
- Transport
- Design & Landscaping
- Flood Risk & Drainage
- Ecology and Green Infrastructure
- Noise
- Air Quality
- Trees
- Archaeology
- Economic Benefits

9.2 Principle of Development

9.2.1 The BBNPA local plan makes clear Brecon is defined as a Key Settlement, strategically placed to serve its surrounding communities. It is seen as a spatial hub to support opportunities for new employment and housing. Development should contribute to maintaining and enhancing a strong and vibrant Market Town. However, it is relatively poorly served in food retail terms; existing local food stores serving Brecon and its rural surrounds primarily include:

- Co-op, Lion Street (1.4km) – In centre
- Morrisons, Free Street (1.5km) – In Centre
- Aldi, The Watton (1.5km) – Out of Centre

9.2.2 Owing to its well-established and growing customer base, Lidl has identified a requirement for a new store in Brecon to meet growing local demand. Currently the only Limited Assortment Discount (LAD) store in Brecon is an Aldi store on Rich Way on the southern edge of the town. The closest Lidl is Merthyr Tydfil over 20km away. The introduction of Lidl to Brecon will materially improve local choice and competition; it will also deliver up to 40 local jobs paying industry leading salaries.



- 9.2.3 PPW states that: *“Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity.”*
- 9.2.4 The site is located outside of the current settlement boundary in an out of centre location but is somewhat anomalous in that it sits directly between two large industrial estates and is surrounded by built-up development on all sides. In the context of **Policies 1, SP1 and SP2** of the BBNPA local plan the site can feasibly be delivered for the proposed development without wider unacceptable impact on the wider countryside setting, and the special qualities of the National Park can be maintained.
- 9.2.5 **Policy SP2** says that major development should only be permitted in the National Park in exceptional circumstances where proven to be in the public interest; this will include an assessment of, inter alia, need. In accordance with PPW and Policy SP2 the application has been supported by a Retail Impact Assessment to assess the salient national policy tests relating to need, the sequential approach and impact.
- 9.2.6 Policy SP2 (b) requires the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need in some other way to be considered. In short, Brecon lies wholly within the National Park, so there is not practical prospect of meeting the need outside the National Park. Based on our investigations, no suitable, available and viable sequentially preferable sites have been identified.
- 9.2.7 In respect of SP2 c) environmental and landscape effects are considered further at Sections 9.5–9.11 below.

9.3 Sustainability

- 9.3.1 Policy SP11 (Sustainable Design) seeks to ensure that all development addresses the principles of sustainable design by demonstrating that they meet national (and when required local) requirements for sustainable design or higher and can demonstrate consideration of renewable energy sources when appropriate.
- 9.3.2 Lidl stores are designed to be as environmentally sound as possible. For example, the store will be heated and cooled by air-conditioning systems controlled through a Building Management System (BMS), with the small amount of hot water required provided by electric water heating to reduce storage losses. The canopy of the store is also designed to minimise thermal gain within the building.
- 9.3.3 The Design and Access Statement confirms that a roof-mounted photovoltaic array of 384 panels, capable of generating up to 180kW at peak, will provide on-site renewable energy for use in the store. The building will exceed the minimum Building Regulations standards for thermal performance, with



double-glazed windows targeting an area-weighted average U-value of no more than 1.1 W/m²K. All internal and external lighting is controlled through the BMS using timers, motion and light sensors, with sales-floor lighting reduced to c.30% one hour after closing.

- 9.3.4 Materials rated A or A+ in the BRE Green Guide will be used where possible, sourced from suppliers with accredited Environmental Management Systems. Water use will be minimised through metering and monthly monitoring, low-water-use fittings and dual-flush WCs. Refrigerated cabinets use doors and night blinds to reduce cooling demand. Together these measures address the requirements of LDP Policies SP4 (Climate Change) and SP11 (Sustainable Design).
- 9.3.5 Sustainable techniques are used during the construction and operation of the development wherever practicable, in accordance with Policy SP11 of the adopted LDP.

9.4 Transport

- 9.4.1 LDP Policy SP17 (Transport) encourages sustainable travel choices to minimise reliance on private vehicles and for new development to be well designed and provide appropriate access for pedestrians and cyclists.
- 9.4.2 The application is supported by a Transport Assessment prepared by SCP.
- 9.4.3 A new vehicle entrance to the site is proposed off the A470 which will be designed in accordance with DMRB CD123 for a ghost-island right turn solution onto a 40mph road.
- 9.4.4 A total of 103 car parking spaces is proposed at the new Lidl foodstore unit. These are 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. A total of 15 enhanced parking bays (Six disabled and nine parent and child) is proposed, representing 14.6% of the total provision. 2no. spaces are proposed as EV charging bays with the infrastructure provided for future transition of general spaces to EV charging spaces in future years in line with the anticipated growth in EV ownership/demand. The level of car parking has been found to be sufficient to meet the operational needs of Lidl customers and is in line with current car parking standards.
- 9.4.5 Servicing for the new food store will conform to the typical Lidl model. Store deliveries will be made by 16.5m articulated lorry via the main vehicular access off the A470 and servicing for the Lidl store will be carried out via an enclosed loading bay to the south of the store. The store will be serviced up to two times a day on average by a maximum legal articulated HGV. Swept path analysis drawings provided within the TA demonstrate that a 16.5m articulated HGV can safely enter and exit the car park in forward gear, such that the store can be serviced while fully operational.



- 9.4.6 The highways capacity assessments within the Transport Assessment demonstrate that there will be substantial spare capacity both at the site access and at the A40/A470 roundabout with Lidl generating vehicular traffic at typical levels even five years beyond anticipated store opening.
- 9.4.7 A Travel Plan is also provided with this application, setting out the proposed measures to encourage active travel to and from the site, and reduce reliance on the private car, and generally promote healthy lifestyles and sustainable communities. These involve:
- A new footway along the eastern side of the A470 adjacent to the proposed store as far as the roundabout junction to the north with the A40 and B4601,
 - New uncontrolled pedestrian crossing facilities of the entry from and exit to the A40 east of the roundabout junction with the A470 to provide a safe connection to the B4601 Newgate Street.
 - A new footway on the southern side of the B4601 roundabout approach, extending around the bend to proposed new eastbound and westbound bus stops,
 - An uncontrolled pedestrian crossing on the B4601 between the two new bus stops.
- 9.4.8 It is concluded that the proposed development meets local and national transport policy objectives in terms of accessibility, sustainability and highway safety. There is no evidence of any severe impact to the interests of the free flow of traffic or of any unacceptable impact to highway safety resulting from the proposals. The proposal is in accordance with the transport related policies set out within the BBNPA LDP, particularly policies SE4, SE8 and SP17.

9.5 Design & Landscaping

- 9.5.1 A detailed consideration of the design aspects of the development is provided in the accompanying Design and Access Statement. An explanation is provided on how the Lidl operational model drives a particular approach to the size, configuration and internal layout of its stores.
- 9.5.2 The DAS, prepared by HTC Architects, explains that alternative layouts were tested before the application scheme was settled. Option 1 placed the store parallel to the A470, presenting its rear elevation to the main highway and requiring high retaining walls along the northern boundary. Option 2 orientated the store to face south-west, but resulted in a segmented car park, an additional vehicular access and greater disruption to existing trees. The application scheme positions the store in the north-east corner of the site, with its glazed elevation facing the A470 roundabout and the car park to the south-west. This improves site circulation and operational efficiency, retains green space along the Afon Tarell and minimises encroachment into the ancient woodland within the southern part of the site.



- 9.5.3 The store is single storey with a modern mono-pitched roof, which reduces the building's presence and creates a clearly identifiable customer entrance. The materials palette comprises a grey metal composite roof, with external walls finished in natural stone and warm grey cladding panels; natural stone is used on the elevations facing the car park to complement the materiality of the surrounding area. This tonality is intended to respect and respond to the natural beauty of the National Park and responds to the NPA's pre-application request to explore a palette of materials. A glazed shopfront on the north elevation brings natural light into the sales area and provides natural surveillance of the car park and pedestrian approach.
- 9.5.4 Perimeter trees and vegetation are retained where possible, and a comprehensive landscaping scheme includes new tree planting to screen the development from its neighbours, together with a rain garden and permeable parking bays that form part of the sustainable drainage strategy (Section 9.7). Six Sheffield stands (12 cycle spaces) are proposed close to the pedestrian entrance on the northern boundary. Advertisement signage shown on the drawings is illustrative only and will be the subject of a separate application for advertisement consent.
- 9.5.5 Corscadden Associates has prepared a Green Infrastructure Statement and a Landscape Visual Appraisal to accompany the application. An extensive Landscape Strategy has been prepared, covering ecology, trees, planting, the building and layout. To mitigate the tree and hedgerow loss necessary to facilitate the development, the following new planting is proposed:
- 36 No trees mainly native;
 - Native hedges 215 linear metres;
 - Native blocks 1125 square metres;
 - Planting beds 139 square metres;
 - Rain Garden 25 square metres and wildflower grass areas 1125 square metres; and
 - Off-Site tree planting.
- 9.5.6 The existing riverbank low land deciduous woodland remains unchanged. The proposed development will enhance existing ecological connectivity through reinforcement planting along site boundaries, strengthening links with off-site vegetation.
- 9.5.7 In addition, a dedicated nature conservation area will be established in the southern part of the Site, along the riverbank and behind the store. Access will be restricted to management and maintenance purposes, with no public access permitted. This will isolate the store and carpark area from new planting and existing vegetation on southeast and northeast boundaries. A section of hedgerow on the A470 highway verge is to be removed for site access, and remedial work will be undertaken in the verge to reduce the impact of the access point and to provide new footpath access.



9.5.8 The Step-wise approach has been followed, whereby avoidance and mitigation have been incorporated into the development. Where unable to avoid or mitigate, compensation has been made on and off site. Most compensation is made on Site and except for trees where compensation is made on Site and off-Site for a value calculated by CAVAT.

9.5.9 Overall, the scale, form, layout and materials of the proposal are appropriate to the site's context, and the development will be integrated into the landscape through retained and new planting, in accordance with LDP Policies SP1 and 1.

9.6 Ecology and Green Infrastructure

9.6.1 The application is supported by a Preliminary Ecological Appraisal (PEA) prepared by Biodiverse Consulting. The PEA presents the key ecological constraints and opportunities in relation to the development. The PEA is informed by a desk-based study and a field-based survey, during which habitats were assessed in line with the UK Habitat Classification (UKHab) methods.

9.6.2 Within 2km of the site, there are seven statutory and three non-statutory designated sites. The River Usk Special Area of Conservation (SAC) located adjacent to site to the south. There is Priority Habitat in Restored Ancient Woodland within the Site, but there are no Priority Habitats bordering the site.

9.6.3 Priority Habitats within 2 km of the Site include:

- Traditional Orchard
- Woodpasture and Parkland
- Purple Moor Grass and Rush Pastures
- Ancient Woodland

9.6.4 Assessment for the following protected species was undertaken:

- **Badger** - Mammal tracks observed during the field survey. Woodland provides some suitability for sett creation, limited by its size and proximity to the steep bank. Grassland and scrub provide suitable foraging and commuting habitat.
- **Bats** – None were observed during the field survey.
- **Birds** – Please refer to the PEA for the birds recorded during the survey. Woodland and scrub provide suitable nesting habitat. Tree line suitability is limited by busy roads. Grassland offers limited nesting habitat due to its small size. Tree lines, woodland and grassland provide some foraging and commuting habitat. The site is low value for breeding and non-breeding birds.
- **Great crested newts** – There are no suitable aquatic habitat onsite. Grassland, woodland and scrub provide suitable terrestrial habitat, and connectivity is limited by fast flowing river and busy roads.



- **Otter** - No aquatic habitat onsite but there is a significant, suitable watercourse adjacent to the site. The onsite woodland provides suitable terrestrial habitat, but its suitability is limited by the noise from the adjacent roads. The site is well connected to surrounding high-suitability watercourses via the offsite watercourse. Further assessments are required. A riparian mammal survey of the Afon Tarell on 7 September 2026 recorded widespread otter activity (15 spraints at 12 locations) and two pairs of burrows on the opposite bank, treated on a precautionary basis as holts. No otter resting places were found within the site. A second survey visit will be completed by September 2027 and before any works begin.
 - **Water vole** - There is no aquatic habitat onsite and the suitability of adjacent watercourse limited by fast flow and rocky banks. Connectivity is limited due to fast flowing river and few suitable watercourses. Further assessments are required.
 - **Reptiles** - Grassland, woodland and scrub provide suitable onsite habitat due to their structural diversity and limited disturbance. Hardstanding, deadwood, wood chippings and stone piles provide suitable basking and sheltering habitat. Further assessments are recommended.
 - **Migratory Fish, Whiteclawed Crayfish** – None were observed during the field survey. There is no suitable aquatic habitat onsite but there is a suitable watercourse adjacent to the site. Strong connectivity to suitable watercourses in the wider surroundings. The site is of low value for migratory fish.
 - **Brown Hare** - Grassland, woodland and scrub provide suitable foraging and commuting habitat. Tree lines and woodland provide moderate habitat connectivity, limited by the river and roads.
 - **Common Toad** - The walkover survey found no species of note. There are no waterbodies onsite.
 - **Hedgehog** - Grassland, woodland and scrub provide suitable foraging and commuting habitat. Tree lines and woodland provide moderate habitat connectivity, limited by the river and roads.
 - **Invertebrates** – The walkover survey found no species of note. Grassland, woodland, scrub and tree lines provide suitable habitat. Suitable food plants for larvae and adults such as ragwort *Jacobaea vulgaris* for cinnabar, annual meadow grass *Poa annua* for small heath and vetches *Vicia* sp. for long-horned bee. The site is of low value for invertebrates.
- 9.6.5 The PEA has set out a range of avoidance and mitigation measures to reduce impacts on animals and habitats. Further survey work is ongoing.
- 9.6.6 As requested at pre-application stage, the application is also supported by a shadow Habitats Regulations Assessment (sHRA) to inform the NPA's assessment as competent authority. The sHRA considers nine European sites. Likely significant effects on all sites other than the River Usk / Afon Wysg SAC are screened out, alone and in combination, as no pathway exists.



9.6.7 The Appropriate Assessment identifies mitigation for six pathways, with safeguarding to be secured by planning conditions and SuDS Approving Body (SAB) approval. Key measures are:

- **Foul water** – confirmation from DCWW, before determination, that the development can connect to the public sewer and that Brecon WwTW can treat the additional flows within its revised permit.
- **Surface water** – treatment of service yard and loading bay runoff before infiltration and an Operational Environmental Management and Maintenance Plan.
- **Construction** – a CEMP with an Ecological Clerk of Works, a construction exclusion zone on the wooded bank, silt and runoff controls, and safe handling of fuels, concrete and contaminated soil.
- **Otter and fish** – a pre-commencement otter survey, no night-time working, safeguards against trapping, a sensitive external lighting strategy (see Lighting section below), and a solid screen along the southern side of the service yard.
- **Riparian habitat and invasive species** – compliance with the Arboricultural Method Statement and Tree Protection Plan, a permanent conservation fence to the wooded bank, a Landscape and Ecological Management Plan (submitted), a growing-season invasive non-native species survey and biosecurity measures.

9.6.8 The sHRA concludes that, provided DCWW gives the drainage confirmation required and this mitigation is secured, the development would not adversely affect the integrity of the River Usk/Afon Wysg SAC, alone or in combination with other plans or projects. The proposal therefore accords with LDP Policies 3, 4 and 10.

9.7 Flood Risk & Drainage

9.7.1 This application is supported by a Flood Consequences Assessment & Drainage Strategy prepared by Waterco.

9.7.2 In short, the risk of fluvial flooding is considered to be very low, and the risk of flooding from all other sources is also considered to be very low. All built development, including the access, lies within Flood Zone 1. The store's finished floor level is set at 141.3m AOD, and all development is over 4.5m above the modelled 0.1% AEP flood level of the Afon Tarell. The small area of surface water Flood Zones 2 and 3 within the site is associated with ponding in an isolated low point, which will be removed through ground reprofiling. No site-specific flood mitigation measures are therefore required.

9.7.3 LDP Policy 56 permits development where adequate water and mains sewerage infrastructure is in place, or can be provided, without detriment to water quality, biodiversity, or residential amenity. Additionally, LDP Policy 58 requires all proposals for new development to incorporate Sustainable



Drainage Systems. The proposed development involves introducing new areas of hardstanding on the site, i.e. the new foodstore, car park and access. The remaining site area will be permeable soft landscaped areas.

- 9.7.4 It is proposed that the surface water from the car park and Lidl store roof will be discharged to soakaways located beneath the car park. The soakaways will be sized to accommodate the 1 in 100 year plus 40% climate change event.
- 9.7.5 All runoff from the car park will be directed through permeable-surfaced parking bays, providing both amenity and water quality benefits. The permeable parking bays will be connected to the soakaways via piped links. A rain garden will be incorporated within the landscaped areas surrounding the car park to provide amenity, biodiversity, and water quality benefits.
- 9.7.6 With regard to foul drainage, a pre-development enquiry was submitted to Dŵr Cymru Welsh Water (DCWW) in July 2026. DCWW has confirmed that foul flows from the development can be accommodated within the public sewerage system. It has advised that flows should connect to the public foul sewer. A pumped connection would be required.
- 9.7.7 Waterco is also exploring an alternative connection to the privately owned sewer upstream of the DCWW foul pumping station c.30m west of the site, which serves Brecon Enterprise Park. This would also likely to need a pumped solution. Discussions with DCWW are ongoing, and the final point of connection can be secured by planning condition. In either case, all foul flows will be conveyed to the public sewerage network for treatment, and there will be no discharge of foul water to ground or to the Afon Tarell.
- 9.7.8 Surface water from the roof and car park will be managed on site via infiltration (Priority Level 2 of the Statutory SuDS Standards), with treatment provided by the permeable paving in line with CIRIA C753. The drainage system will remain in private ownership and will be maintained by Lidl Great Britain Ltd in accordance with the maintenance schedules in the FCA. The system will be subject to separate approval by the SuDS Approving Body (SAB).
- 9.7.9 The proposal accords with the aims of the LDP regarding water and sewage supply for new development; in particular LDP Policies 10 (Water Quality) and 11 (Sustainable Use of Water); and LDP Policy 58 requiring new development to consider sustainable drainage systems.

9.8 Trees

- 9.8.1 Policy 8 relates to trees and aims to ensure all trees and their root systems are protected and that any removal must be replaced on site utilising native trees of local provenance. To accord with local and national policy tree removal should be limited as much as possible and where required be replaced at a ratio of 3:1.



- 9.8.2 This application is supported by an Arboricultural Report, including a Tree Survey, Tree Constraints Plan, Arboricultural Impact Assessment, Tree Protection Plan and Arboricultural Method Statement prepared by ArbTS.
- 9.8.3 The tree survey identifies a total of two individual trees, four tree groups and one hedgerow on site. Of these, 1no. individual tree and 1no. tree group are Category A (High- Most Desirable); 1 no individual tree and 2no tree groups are Category B (Moderate Quality); 1no. tree group and the 1no. hedgerow are Category C (Low quality). There is one Tree Preservation Order (TPO) trees on the site.
- 9.8.4 The removal of four trees is identified for removal to facilitate the construction of the proposed development design which are all either high or moderate quality (A/B Category). However, the report concludes that the removal of these four trees will only cause a moderate adverse impact on the area's tree amenity since they are mainly screened by the boundary hedgerow and set back off the main road.
- 9.8.5 To ensure that suitable compensatory tree planting is delivered both on and off-site, a Capital Asset Value for Amenity Trees assessment has been conducted.
- 9.8.6 The report includes an Arboricultural Method Statement (AMS), setting out the measures recommended for the construction phase. Subject to compliance with the AMS, the proposed development can be constructed while ensuring no significant long-term adverse impact on the retained trees.

9.9 Noise

- 9.9.1 A Noise Assessment, prepared by inacoustic, has been prepared to accompany this application to understand potential noise effects and how these may be mitigated. The installation of specified plant for the store will comprise low impacts during both daytime and nighttime. The assessment identifies that noise from vehicle deliveries during the day, or night is unlikely to increase noise levels at the closest sensitive dwellings and as such, will result in no greater than a negligible effect. Noise from customer vehicles in the car park is unlikely to significantly increase noise levels at the closest sensitive dwellings and will result in no change and no effect.
- 9.9.2 Accordingly, noise is not considered to be a material constraint to the application.

9.10 Lighting

- 9.10.1 LDP Policy 12 (Light Pollution) requires a full lighting scheme to be submitted where lighting is proposed, demonstrating no significant adverse effect on the surrounding area. This is supported by the NPA's Obtrusive Light and Light Pollution SPG (2015).
- 9.10.2 The site lies within the Bannau Brycheiniog International Dark Sky Reserve and adjoins the Afon Tarell, part of the River Usk / Afon Wysg SAC.



- 9.10.3 The application is supported by a Lighting Impact Assessment (LIA) and external lighting design prepared by Services Design Solution (SDS). The scheme follows ILP Guidance Note 01/26 for the Avoidance of Obtrusive Light, ILP Guidance Note 08/23 on Bats and Artificial Lighting at Night, and the Welsh Government's Good Practice Guidance on Planning for the Conservation and Enhancement of Dark Skies in Wales. Light spill has been modelled.
- 9.10.4 The baseline survey found the site to be intrinsically dark, with no existing light sources.
- 9.10.5 The scheme uses the minimum lighting needed for safe operation:
- 5 lux for the car park and pedestrian routes;
 - 30 lux at the canopied store entrance;
 - 50 lux in the service yard, where HGVs turn and unload.
- 9.10.6 The car park and access are proposed to be lit by column-mounted lights no more than 5m high, below the existing 8m road lighting. The service yard is lit by wall-mounted lights. All lights are proposed as Dark Sky Approved LED fittings and use warm white with negligible UV to reduce effects on bats and other wildlife.
- 9.10.7 External lighting will operate only between 07:00 and 23:00. It will be switched automatically by timers and photocells, and presence detectors will dim luminaires during quieter periods. Illuminated signage will not be lit more than one hour before opening and will be switched off within one hour of closing.
- 9.10.8 The modelling is worst case: all luminaires are on at full output, with no allowance for the screening effect of louvres, shields or vegetation. It shows horizontal light spill below 0.5 lux at the site boundaries.
- 9.10.9 During construction, lighting will be controlled through the CEMP:
- working hours will be agreed;
 - lighting will be switched off when not needed;
 - luminaires will be angled away from boundary vegetation and below 70° from horizontal;
 - compounds will be kept away from retained trees, hedgerows and dark corridors.
- 9.10.10 In line with the sHRA, there will be no night-time working near the bank. A solid screen along the southern side of the service yard will contain light and noise from deliveries. Delivery vehicles will use broadband reversing alarms and switch off engines while unloading.
- 9.10.11 The LIA shows lighting has been kept to the minimum needed for safety, with no upward light and spill held below 0.5 lux at the sensitive southern boundary. Implementation in accordance with the LIA and the approved lighting drawings can be secured by planning condition. On that basis, the proposal



accords with LDP Policy 12 and the NPA's Obtrusive Light SPG and respects the Dark Sky Reserve designation.

9.11 Air quality

- 9.11.1 An Air Quality Assessment, prepared by SLR, has been submitted with the application. The assessment has considered both the construction and operational phases of the development.
- 9.11.2 During the construction phase, potential dust impacts are assessed. The AQA sets out mitigation measures at Appendix B of the AQA which will ensure residual effects from dust emissions during the construction phase are not significant.
- 9.11.3 During the operational phase, impacts arising from road traffic emissions associated with the proposed development are assessed, utilising traffic data provided with the Transport Assessment. The assessment has reviewed the impacts on human and ecological receptors.
- 9.11.4 Regarding human receptors, the effects associated with air quality are not considered to be significant.
- 9.11.5 In terms of ecological receptors, only impacts on the River Usk / Afon Wysg SAC (ER1) require further assessment. The maximum annual mean NO_x concentration was concluded to have no Likely Significant Effects. The maximum annual ammonia level was modelled to exceed the critical levels so further assessment has been undertaken.
- 9.11.6 The further assessment found that background ammonia concentrations at the River Usk / Afon Wysg SAC already approach or exceed the 1µg/m³ critical level. The development's maximum contribution is 0.4µg/m³ (c.35.5% of the critical level alone, or c.35.9% in combination), giving a maximum predicted environmental concentration of 2.0µg/m³. However, the area where the development's contribution exceeds 1% of the critical level is approximately 10,261m², equivalent to around 0.10% of the SAC's total designated area.
- 9.11.7 Nutrient nitrogen and acid deposition were assessed on the same conservative basis, using the most sensitive habitat features listed for the SAC on APIS and the lowest critical loads.
- 9.11.8 The modelling reports the maximum predicted impacts and is therefore conservative. In accordance with NRW and IAQM guidance, where a conclusion of no likely significant effect could not be reached on the air quality modelling alone, the results have been referred to the project ecologist (Biodiverse), and their significance is determined in the shadow Habitats Regulations Assessment (sHRA) submitted with the application.
- 9.11.9 Regarding mitigation, the AQA sets out mitigation measures relating to the generation of dust. For the operational phase, no mitigation is needed for the human receptors. Notwithstanding this, the development will include EV charging infrastructure. The results for the AQA have been passed onto



the project ecologists for consideration in the sHRA. Potential effects and any necessary mitigation relating to the ecological receptors will be identified within the sHRA.

9.12 Archaeology

- 9.12.1 Following pre-application advice from BBNPA, Cotswold Archaeology (CA) was commissioned to undertake a Historic Environment Desk-Based Assessment to support the application.
- 9.12.2 The HEDBA identified a low potential for later prehistoric to Roman buried archaeological remains to be present in the Site, reflecting the limited archaeological record in the study area. Roman remains may have potential to inform the understanding of the development of Roman transportation and military occupation in the area, and if found, would be of archaeological interest.
- 9.12.3 The Site has potential to contain medieval to modern agricultural, industrial and transport-related remains. These may include a former post-medieval leat, possible associated industrial features, the route of the former A470/turnpike road, and a small former agricultural structure. Any such remains are expected to be of low archaeological significance and are unlikely to constitute non-designated heritage assets, with the possible agricultural structure considered to have negligible archaeological value. CA believe the heritage impacts of their truncation and/or removal could be addressed through an appropriate condition.
- 9.12.4 The setting of historic assets was assessed in the HEDBA, assessing several designated assets within the 3km settings study area, including Newton House and associated buildings, assets in west Llanfaes, Ffrwdgrech Park and associated assets, Pen-y-Crug hillfort, and Penoyre Park and associated assets. No assets were identified as having a non-physical impact from the proposed development. Accordingly, the proposals would not lead to harm to the significance of any potentially sensitive historic assets as a result of the potential change within their settings

9.13 Economic Benefits

- 9.13.1 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).
- 9.13.2 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).
- 9.13.3 Regarding economic benefits, the proposals will create in the region of up to 40 jobs from store assistants and cleaners to managers. The proposals therefore represent a significant increase in



employment opportunities to the surrounding residential area, accessible on foot / cycle. Inward investment into a Lidl store will likewise benefit existing surrounding businesses. The proposals will create indirect job opportunities associated with the supply chain serving the store, such as delivery drivers etc.



SECTION 10

Conclusions



10.0 Conclusions

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 Bannau Brycheiniog National Park Authority for the construction of a new Lidl foodstore, access, car parking, landscaping and all associated works at land at A470, Brecon.

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

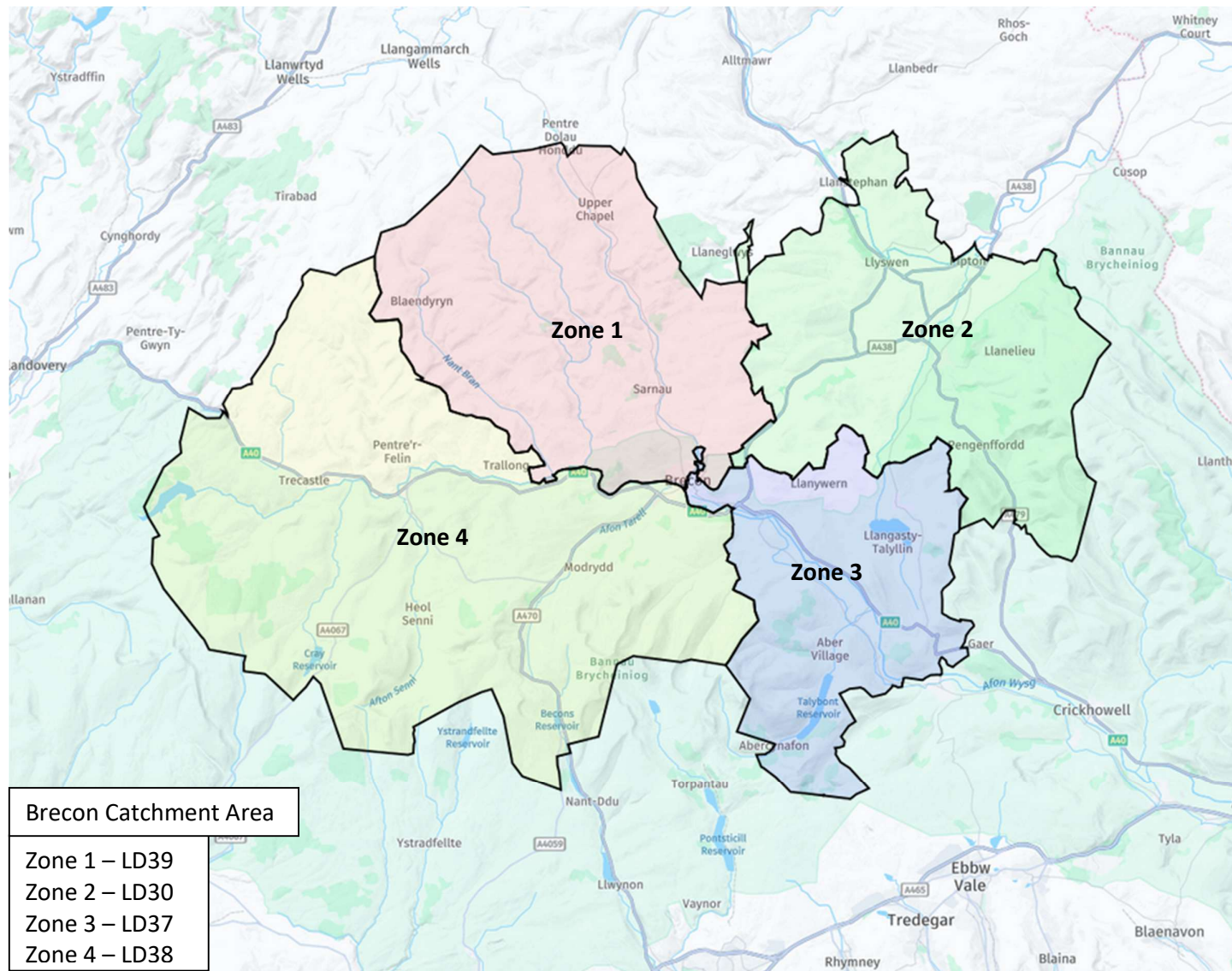
- Need – there is convenience expenditure capacity within the PCA, and Brecon’s two principal foodstores (Morrisons and Aldi) are overtrading. Both quantitative and qualitative need for additional convenience provision is demonstrated, in accordance with PPW paragraphs 4.3.14–4.3.16 and TAN 4.
- Sequential approach – the site is out of centre. A sequential search of Brecon town centre, edge-of-centre opportunities, LDP allocations and other available premises has identified no suitable, available and viable sequentially preferable sites capable of accommodating the proposal, having regard to the flexibility required by PPW and the prevailing judgments.
- Retail impact – although the store falls below the 2,500 sqm threshold in PPW, a proportionate impact assessment has been undertaken. Around 70% of the store’s trade is expected to be drawn from the overtrading Morrisons and Aldi stores, which are well placed to absorb the trading effects. The overall impact on Brecon centre (c.-7%) is not significantly adverse, the centre is vital and viable, and no existing, committed or planned in-centre investment would be undermined. The proposal therefore accords with LDP Policy SP13 and PPW.
- Major development – the proposal meets an identified local need, delivers up to 40 jobs and significant local investment, and its environmental effects can be moderated through design, landscaping and conditions, satisfying the tests of LDP Policy SP2 and PPW. Brecon lies entirely within the National Park. There is no practical prospect of delivery of the development to serve local needs sustainably outside of the National Park.
- Technical matters – the supporting assessments demonstrate that the site can be safely accessed, with new footways, crossings and bus stops improving active travel and public transport links; that the development lies in Flood Zone 1 at very low risk of flooding, with surface water managed by SuDS infiltration and foul flows accommodated in the public sewer; that air quality effects on human receptors are not significant, with effects on the River Usk SAC addressed in the sHRA; and that noise, trees, archaeology and design are acceptable or can be addressed by condition.



- 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 Bannau Brycheiniog National Park Authority granting planning permission for the proposed development, subject to appropriate conditions and planning obligations.

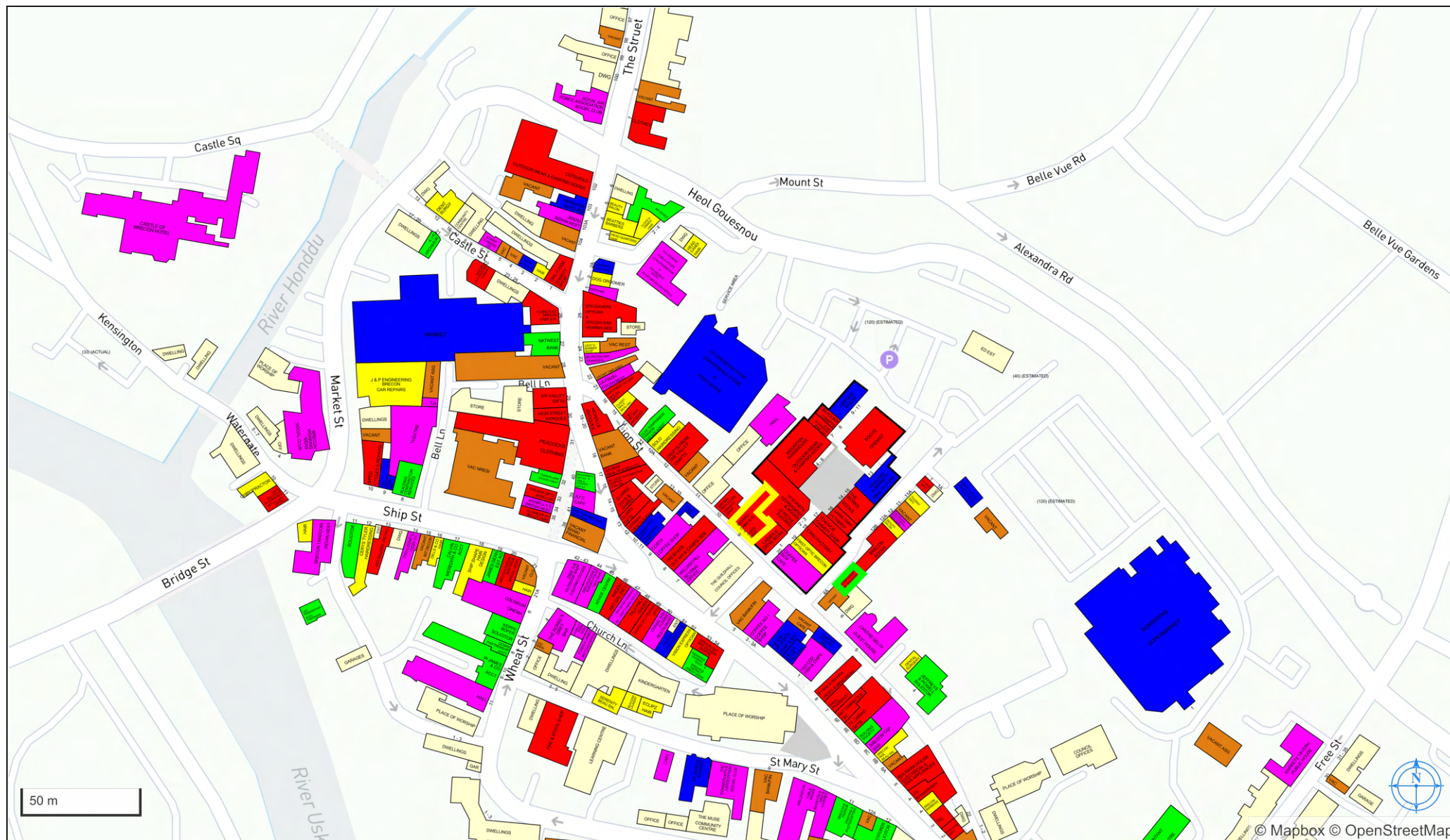


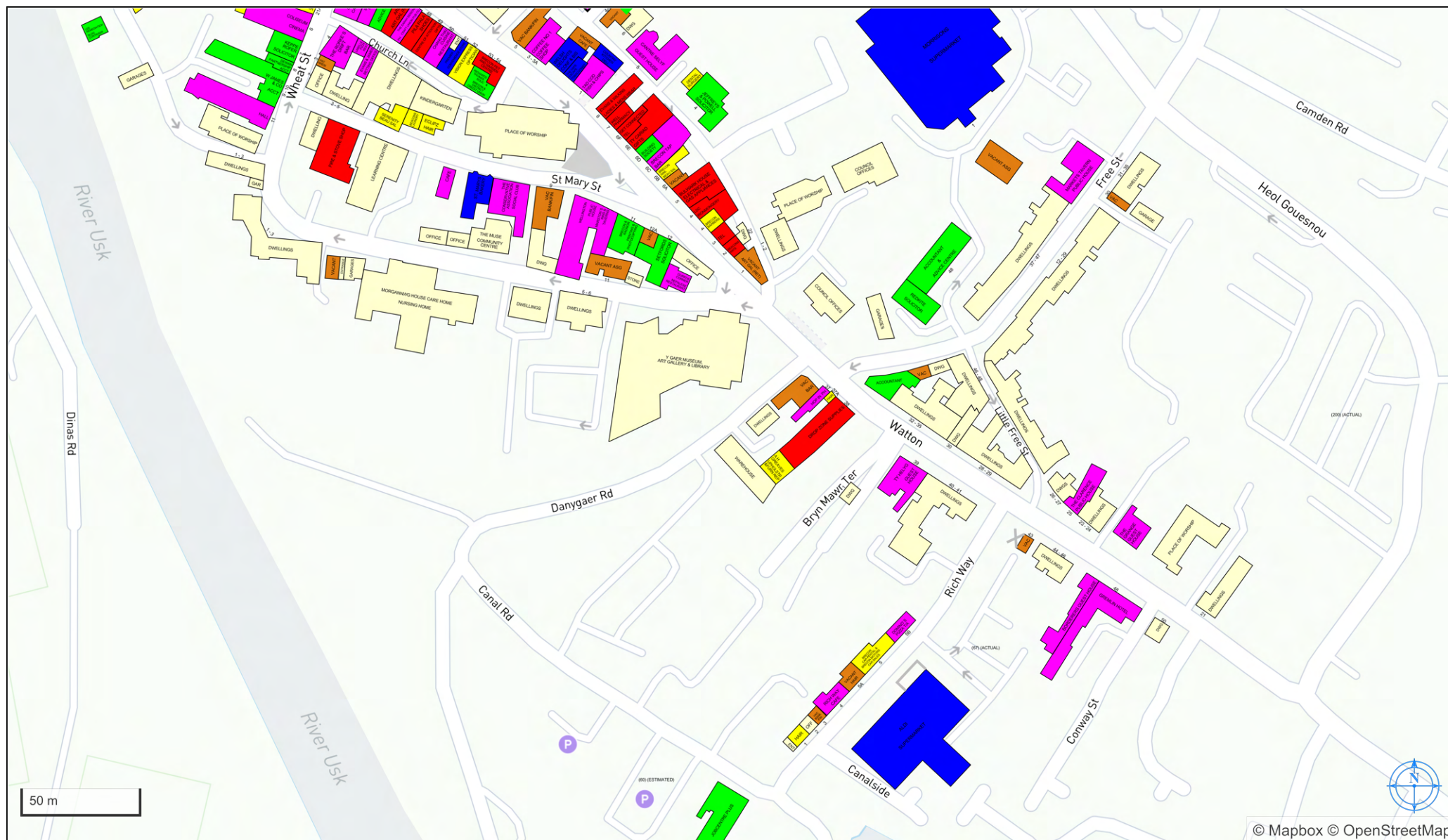
Appendix A – Primary Catchment Area (PCA)





Appendix B – Brecon GOAD Plan







Appendix C – Statistical Tables

Lidl Great Britain Ltd
Land at A470, Brecon

Table 1: Population

Zone	2026	2027	2028	2029	2030	2031	Change 2026-2031	
							No.	%
	[1]					[2]	[3]	[4]
Zone 1	5,335	5,360	5,378	5,394	5,409	5,429	94	1.8
Zone 2	4,507	4,535	4,552	4,573	4,595	4,607	100	2.2
Zone 3	5,375	5,388	5,396	5,425	5,452	5,474	99	1.8
Zone 4	4,613	4,626	4,642	4,660	4,684	4,703	90	2.0
Total	19,830	19,909	19,968	20,052	20,140	8,999	-10,831	-54.6

Notes:

Population projections obtained from Experian Location Analyst Report

[3] = [2] - [1]

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

Lidl Great Britain Ltd
Land at A470, Brecon

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

Zone	2026	2027	2028	2029	2030	2031
Zone 1	2,968	2,947	2,936	2,924	2,909	2,901
Zone 2	3,219	3,197	3,184	3,171	3,156	3,146
Zone 3	3,180	3,157	3,145	3,132	3,116	3,107
Zone 4	3,096	3,074	3,062	3,050	3,035	3,026

Notes:

per capita figures sourced from Experian Location Analyst report data

Excludes SFT in line with Fig 5 of EXRPBN 23 (Mar 2026)

subsequent years projected forward in accordance with growth rates set out in App 3 of EXRPBN 23 (adj. for SFT (sales via st

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

Zone	2026	2027	2028	2029	2030	2031
Zone 1	2,992	3,028	3,079	3,141	3,204	3,274
Zone 2	3,167	3,205	3,259	3,324	3,391	3,465
Zone 3	3,315	3,354	3,411	3,480	3,549	3,627
Zone 4	2,990	3,026	3,078	3,139	3,202	3,273

Notes:

per capita figures sourced from Experian Location Analyst data

Excludes SFT in line with Fig 5 of EXRPBN 23 (Mar 2026)

subsequent years projected forward in accordance with growth rates set out in App 3 of EXRPBN 23 (adj. for SFT (sales via st

Table 4a: Total Convenience Goods Expenditure, 2026-2031 (£m)

Zone	2026	2027	2028	2029	2030	2031	Change 2026-2031	
							£m	%
	[1]					[2]	[3]	[4]
Zone 1	15.8	15.8	15.8	15.8	15.7	15.7	-0.1	-0.6
Zone 2	14.5	14.5	14.5	14.5	14.5	14.5	0.0	-0.1
Zone 3	17.1	17.0	17.0	17.0	17.0	17.0	-0.1	-0.5
Zone 4	14.3	14.2	14.2	14.2	14.2	14.2	-0.1	-0.4
Total	61.7	61.5	61.5	61.5	61.4	61.5	-0.2	-0.4

Notes:

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

[3] = [2] - [1]

[4] = [3]%

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

Zone	2026	2027	2028	2029	2030	2031
Zone 1	11.1	11.1	11.1	11.0	11.0	11.0
Zone 2	10.2	10.1	10.1	10.2	10.1	10.1
Zone 3	12.0	11.9	11.9	11.9	11.9	11.9
Zone 4	10.0	10.0	10.0	9.9	10.0	10.0
Total	43.2	43.1	43.0	43.0	43.0	43.0

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	2026	2027	2028	2029	2030	2031
Zone 1	4.8	4.7	4.7	4.7	4.7	4.7
Zone 2	4.4	4.3	4.3	4.4	4.3	4.3
Zone 3	5.1	5.1	5.1	5.1	5.1	5.1
Zone 4	4.3	4.3	4.3	4.3	4.3	4.3
Total	18.5	18.5	18.4	18.4	18.4	18.4

Notes:

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

2024 prices

Table 5a: Total Comparison Goods Expenditure, 2026-2031 (£m)

Zone	2026	2027	2028	2029	2030	2031	Change 2026-2031	
							£m	%
	[1]					[2]	[3]	[4]
Zone 1	16.0	16.2	16.6	16.9	17.3	17.8	1.8	11.4
Zone 2	14.3	14.5	14.8	15.2	15.6	16.0	1.7	11.9
Zone 3	17.8	18.1	18.4	18.9	19.4	19.9	2.0	11.4
Zone 4	13.8	14.0	14.3	14.6	15.0	15.4	1.6	11.6
Total	61.8	62.8	64.1	65.7	67.3	69.0	7.1	11.5

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 2026 (£m) (Ex SFT)

	Zone 1	Zone 2	Zone 3	Zone 4
Clothing & Footwear	4.1	3.4	4.3	3.4
Furniture & Floor Coverings	0.9	0.7	1.0	0.7
DIY, Decorating & Gardening	1.3	1.4	1.5	1.2
Electrical	1.7	1.5	1.9	1.5
Small Household	2.4	2.3	2.9	2.2
Recording Media & Books	1.5	1.4	1.6	1.2
Chemist	1.8	1.4	1.8	1.5
Recreation	2.3	2.3	2.7	2.2
Total Comparison	16.0	14.3	17.8	13.8

2024 prices

Lidl Great Britain Ltd
Land at A470, Brecon

Table 6: Convenience shopping patterns, %

Destination	Zone 1		Zone 2		Zone 3		Zone 4	
	Main	TU	Main	TU	Main	TU	Main	TU
Zone 1								
Spar, Bryn De Winton, Brecon, LD3 9HN	0.00%	4.17%	0.00%	0.00%	0.00%	1.25%	0.00%	0.00%
Zone 2								
Asda Express (Wye Garage), Llyswen, Brecon, LD3 0UR	1.33%	0.76%	0.00%	0.00%	0.00%	0.00%	0.00%	0.83%
Boughrood Stores, Main Road, B4350, Boughrood, LD3 0YD	0.00%	0.00%	0.00%	1.04%	0.00%	0.00%	0.00%	0.00%
Bronllys Garage & Supermarket (Morrisons Daily), Hay Road, Bronllys, LD3 0LG	0.00%	0.00%	2.16%	5.04%	0.00%	0.00%	0.00%	0.00%
Claire's Wholefoods, High Street, Talgarth, LD3 0PF	0.00%	0.00%	0.00%	2.19%	0.00%	0.00%	0.00%	0.00%
Co-op, Hay Road, Talgarth, LD3 0AW	0.00%	0.00%	1.93%	66.66%	0.67%	3.79%	0.00%	0.83%
Old Railway Line Garden Centre & Farm Shop, Three Cocks, Brecon, LD3 0SG	0.00%	0.00%	0.00%	0.52%	0.00%	0.00%	0.00%	0.00%
One Stop, Liverpool House, The Square, Talgarth, LD3 0BW	0.00%	0.00%	0.00%	3.23%	0.00%	0.63%	0.00%	0.00%
WJ George Butchers & Deli Pot, High Street, Talgarth, LD3 0PD	0.00%	0.00%	0.00%	2.71%	0.00%	0.00%	0.00%	0.00%
Zone 3								
Aldi, The Watton, Rich Way, Brecon, LD3 7ED	38.91%	23.78%	27.70%	7.04%	35.49%	20.21%	32.92%	21.10%
Bargain Booze Select Convenience, High Street, Brecon, LD3 7AL	0.00%	0.00%	0.00%	0.00%	0.00%	0.96%	0.00%	0.00%
Co-op, Lion Street, Brecon, LD3 7HY	5.22%	16.33%	6.42%	2.44%	5.95%	18.93%	5.96%	20.57%
Morrisons Supermarket, Free Street, Brecon, LD3 7SE	43.18%	45.47%	36.11%	8.09%	46.36%	39.93%	47.76%	27.64%
Premier, High Street, Brecon, LD3 7AP	0.00%	2.15%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Siop Llangors Shop, Main Road, Llangorse, LD3 7UA	0.00%	0.00%	0.00%	0.00%	0.00%	2.51%	0.00%	0.00%
St Mary's Bakery, St Mary Street, Brecon, LD3 7BH	0.00%	0.00%	0.00%	0.00%	0.00%	2.63%	0.00%	0.00%
Talybont Stores & Post Office, Main Road, B4558, Talybont-on-Usk, LD3 7YJ	0.00%	0.00%	0.00%	0.00%	0.00%	5.27%	0.00%	0.00%
Zone 4								
B&M Home Store & Garden Centre, Brecon Enterprise Park, Brecon, LD3 8BT	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.59%	0.00%
Londis (Petrol Station), A40, Sennybridge, LD3 8PS	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	9.43%
Sennybridge Post Office, High Street, Sennybridge, LD3 8PG	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.98%
Spar (Petrol Station), Castle Road, Sennybridge, LD3 8PS	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6.25%
Spar (Petrol Station), Church Street, Brecon, LD3 8BY	0.00%	2.48%	0.00%	0.00%	0.00%	0.00%	0.00%	7.67%
Outside Survey Area								
Asda Supercentre, Belmont Road, Hereford, HR2 7JE	0.00%	0.00%	0.00%	0.00%	1.03%	0.00%	0.00%	0.00%
Asda Supermarket, Glanyrafon, Godrergraig, Ystalyfera, SA9 2DE	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.32%	0.00%
Asda Superstore, Dowlais Top Retail Park, Merthyr Tydfil, CF48 2YF	0.66%	0.00%	8.38%	0.00%	3.30%	0.00%	1.95%	0.00%
Co-op, High Street, Llandoverly, SA20 0RA	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.07%	0.00%
Co-op, Newport Street, Hay-on-Wye, HR3 5BZ	0.00%	0.00%	1.29%	0.00%	0.00%	0.00%	0.00%	0.00%
Grenfells & Sons Grocers, High Street, Crickhowell, NP8 1BD	0.00%	0.00%	0.00%	0.00%	0.00%	1.25%	0.00%	0.00%
Lidl, Bulwark Road, Bulwark, Chepstow, NP16 5JW	0.00%	0.00%	0.00%	0.00%	0.00%	2.01%	0.00%	0.00%
Lidl, Ffordd Parc Ynysderw, Pontardawe, SA8 4AG	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.32%	0.00%
Local shops, Merthyr Tydfil Town Centre	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.94%	0.00%
M&S Store, Cyfarthfa Retail Park, Merthyr Tydfil, CF48 1HY	1.90%	2.19%	4.38%	1.04%	4.43%	0.00%	3.05%	0.69%
Morrisons Supermarket, Grange Road, Cwmbran, NP44 1QP	0.00%	0.00%	0.00%	0.00%	0.67%	0.00%	0.00%	0.00%
Morrisons Supermarket, Park Road, Abergavenny, NP7 5TP	0.00%	1.09%	0.00%	0.00%	0.67%	0.63%	0.98%	0.00%
Morrisons Supermarket, Station Approach, Hereford, HR1 1DN	0.00%	0.00%	0.32%	0.00%	0.00%	0.00%	0.00%	0.00%
Oakchurch Farm Garden Centre & Farm Shop, Brecon Road, Staunton on Wye, LD3 0AG	0.95%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Sainsbury's Superstore, Barton Yard, Hereford, HR4 0AG	0.00%	0.00%	0.65%	0.00%	0.00%	0.00%	0.00%	0.00%
Sainsbury's Superstore, Brown Lennox Retail Park, off A470, Pontypridd, CF37 4LL	0.00%	0.38%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Spar, Castle Street, Hay-on-Wye, HR3 5DF	0.00%	1.21%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Tesco Extra, Beacons Place, Merthyr Tydfil, CF47 0AL	4.01%	0.00%	3.12%	0.00%	0.00%	0.00%	0.65%	0.00%
Tesco Superstore, Waterloo Road, Llandrindod Wells, LD1 6BH	0.00%	0.00%	0.65%	0.00%	0.00%	0.00%	0.00%	0.00%
Tesco Superstore, Wind Road, Ystradgynlais, SA9 1AD	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.32%	0.00%
Waitrose, Llanfoist, Abergavenny, NP7 9LL	3.84%	0.00%	6.89%	0.00%	1.42%	0.00%	2.16%	0.00%

Notes

taken from NEMS household survey - Main (Q1&Q11) Top Up (Q14&Q22)
Exc Nulls, SFT

Lidl Great Britain Ltd
Land at A470, Brecon

Table 7: Convenience Turnover of Existing facilities, 2026 (£m)

Destination	Zone 1			Zone 2			Zone 3			Zone 4			Total (£m)
	Main	TU	Sub Total	Main	TU	Sub Total	Main	TU	Sub Total	Main	TU	Sub Total	
Zone 1													
Spar, Bryn De Winton, Brecon, LD3 9HN	0.0	0.2	0.2	0.0	0.0	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.26
Zone 2													
Asda Express (Wye Garage), Llyswen, Brecon, LD3 0UR	0.1	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.22
Boughrood Stores, Main Road, B4350, Boughrood, LD3 0YD	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.05
Bronllys Garage & Supermarket (Morrisons Daily), Hay Road, Bronllys, LD3 0LG	0.0	0.0	0.0	0.2	0.2	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.44
Claire's Wholefoods, High Street, Talgarth, LD3 0PF	0.0	0.0	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.10
Co-op, Hay Road, Talgarth, LD3 0AW	0.0	0.0	0.0	0.2	2.9	3.1	0.1	0.2	0.3	0.0	0.0	0.0	3.41
Old Railway Line Garden Centre & Farm Shop, Three Cocks, Brecon, LD3 0SG	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.02
One Stop, Liverpool House, The Square, Talgarth, LD3 0BW	0.0	0.0	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.17
WJ George Butchers & Deli Pot, High Street, Talgarth, LD3 0PD	0.0	0.0	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.12
Zone 3													
Aldi, The Watton, Rich Way, Brecon, LD3 7ED	4.3	1.1	5.4	2.8	0.3	3.1	4.2	1.0	5.3	3.3	0.9	4.2	18.04
Bargain Booze Select Convenience, High Street, Brecon, LD3 7AL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.05
Co-op, Lion Street, Brecon, LD3 7HY	0.6	0.8	1.4	0.7	0.1	0.8	0.7	1.0	1.7	0.6	0.9	1.5	5.3
Morrisons Supermarket, Free Street, Brecon, LD3 7SE	4.8	2.2	6.9	3.7	0.4	4.0	5.5	2.0	7.6	4.8	1.2	6.0	24.52
Premier, High Street, Brecon, LD3 7AP	0.0	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.10
Siop Llangors Shop, Main Road, Llangorse, LD3 7UA	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.13
St Mary's Bakery, St Mary Street, Brecon, LD3 7BH	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.14
Talybont Stores & Post Office, Main Road, B4558, Talybont-on-Usk, LD3 7YJ	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.3	0.0	0.0	0.0	0.27
Zone 4													
B&M Home Store & Garden Centre, Brecon Enterprise Park, Brecon, LD3 8BT	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.06
Londis (Petrol Station), A40, Sennybridge, LD3 8PS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	0.4	0.40
Sennybridge Post Office, High Street, Sennybridge, LD3 8PG	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.2	0.21
Spar (Petrol Station), Castle Road, Sennybridge, LD3 8PS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.3	0.27
Spar (Petrol Station), Church Street, Brecon, LD3 8BY	0.0	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.3	0.45
Outside Survey Area													
Asda Supercentre, Belmont Road, Hereford, HR2 7JE	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.0	0.0	0.12
Asda Supermarket, Glanyrafon, Godrergraig, Ystalyfera, SA9 2DE	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.03
Asda Superstore, Dowlais Top Retail Park, Merthyr Tydfil, CF48 2YF	0.1	0.0	0.1	0.9	0.0	0.9	0.4	0.0	0.4	0.2	0.0	0.2	1.51
Co-op, High Street, Llandoverly, SA20 0RA	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.2	0.21
Co-op, Newport Street, Hay-on-Wye, HR3 5BZ	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.13
Grenfells & Sons Grocers, High Street, Crickhowell, NP8 1BD	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.06
Lidl, Bulwark Road, Bulwark, Chepstow, NP16 5JW	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.10
Lidl, Ffordd Parc Ynysderw, Pontardawe, SA8 4AG	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.03
Local shops, Merthyr Tydfil Town Centre	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.09
M&S Store, Cyfarthfa Retail Park, Merthyr Tydfil, CF48 1HY	0.2	0.1	0.3	0.4	0.0	0.5	0.5	0.0	0.5	0.3	0.0	0.3	1.67
Morrisons Supermarket, Grange Road, Cwmbran, NP44 1QP	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.0	0.0	0.08
Morrisons Supermarket, Park Road, Abergavenny, NP7 5TP	0.0	0.1	0.1	0.0	0.0	0.0	0.1	0.0	0.1	0.1	0.0	0.1	0.26
Morrisons Supermarket, Station Approach, Hereford, HR1 1DN	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.03
Oakchurch Farm Garden Centre & Farm Shop, Brecon Road, Staunton on Wye, HR4 7NH	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.11
Sainsbury's Superstore, Barton Yard, Hereford, HR4 0AG	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.07
Sainsbury's Superstore, Brown Lennox Retail Park, off A470, Pontypridd, CF37 4DA	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.02
Spar, Castle Street, Hay-on-Wye, HR3 5DF	0.0	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.06
Tesco Extra, Beacons Place, Merthyr Tydfil, CF47 0AL	0.4	0.0	0.4	0.3	0.0	0.3	0.0	0.0	0.0	0.1	0.0	0.1	0.83
Tesco Superstore, Waterloo Road, Llandrindod Wells, LD1 6BH	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.07
Tesco Superstore, Wind Road, Ystradgynlais, SA9 1AD	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.03
Waitrose, Llanfoist, Abergavenny, NP7 9LL	0.4	0.0	0.4	0.7	0.0	0.7	0.2	0.0	0.2	0.2	0.0	0.2	1.51
	11.1	4.8	15.8	10.2	4.4	14.5	12.0	5.1	17.1	10.0	4.3	14.3	61.7

Table 8: Comparison Turnover of Existing facilities, 2026 (£m)

Destination	Zone 1								Zone 2								Zone 3								Zone 4												
	C&F	F&FC	DIY	Elec	Sm H/H	Books	Chem	Recre	Sub Total	C&F	F&FC	DIY	Elec	Sm H/H	Books	Chem	Recre	Sub Total	C&F	F&FC	DIY	Elec	Sm H/H	Books	Chem	Recre	Sub Total	C&F	F&FC	DIY	Elec	Sm H/H	Books	Chem	Recre	Sub Total	Total £m
Zone 1																																					
Brecon Leisure Centre, Penlan, Brecon, LD3 9SR	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.00
Zone 2																																					
Bronllys Garage & Supermarket (Morrisons Daily), Hay Road, Bronllys, LD3 0LG	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.05	
Co-op, Hay Road, Talgarth, LD3 0AW	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.08	
Gwernyfed Walled Garden, Three Cocks, Brecon, LD3 0SG	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.02	
Old Railway Line Garden Centre & Farm Shop, Three Cocks, Brecon	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.1	0.4	0.0	0.0	0.5	0.0	0.0	0.0	0.0	0.1	0.6	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.1	1.21
Talgarth Building Supplies, Hay Road, Talgarth, LD3 0AL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.02
Talgarth Town Centre	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.3	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.81	
Zone 3																																					
Aldi, The Watton, Rich Way, Brecon	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.2	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.1	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.58
Brecon Barracks, Watton, Brecon, LD3 7EN	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.00	
Brecon Town Centre	1.5	0.3	0.4	0.9	0.7	1.0	1.4	1.5	7.7	0.2	0.0	0.1	0.3	0.1	0.2	0.2	1.0	2.1	1.0	0.1	0.2	1.0	0.4	0.8	1.1	1.2	5.7	1.2	0.1	0.4	0.9	0.6	0.7	1.1	1.2	6.2	21.72
Morrisons Supermarket, Free Street, Brecon	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.3	0.0	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.57
Zone 4																																					
B&M Home Store & Garden Centre, Brecon Enterprise Park, Brecon	0.1	0.0	0.2	0.1	0.2	0.0	0.0	0.1	0.7	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.2	0.0	0.0	0.2	0.1	0.2	0.0	0.0	0.0	0.0	0.5	0.0	0.0	0.4	0.1	0.3	0.0	0.2	1.0	2.35
Brecon Enterprise Park, Warren Road, Brecon	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.1	0.1	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.38	
Hay & Brecon Farmers Brecon, Ffrwdgrech Road, Brecon	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1	0.23	
Llanfaes Village Centre	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.00	
Screwfix, Brecon Enterprise Park, Brecon	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.08	
Sennybridge Village Centre	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.1	0.11	
Outside Survey Area																																					
Abergavenny Garden Centre, Evesham Gardens, Church Lane, Llanfoist, Abergavenny, NP7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.06	
Abergavenny Town Centre	0.2	0.0	0.0	0.0	0.4	0.2	0.0	0.1	0.9	0.5	0.1	0.2	0.0	0.6	0.5	0.1	0.1	2.1	0.2	0.1	0.0	0.0	0.2	0.2	0.1	0.2	0.9	0.3	0.1	0.1	0.1	0.2	0.0	0.0	0.1	0.9	4.87
Asda Supercentre, Belmont Road, Hereford	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.1	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.16
Asda Superstore, Dowlais Top Retail Park, Merthyr Tydfil	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.1	0.2	0.0	0.0	0.0	0.0	0.0	0.1	0.1	0.0	0.2	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.53	
B&Q, Cyfarthfa Shopping Park, Merthyr Tydfil	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.1	0.26
B&Q, Holmer Road, Hereford, HR4 9SH	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.04
Bath City Centre	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.											

Lidl Great Britain Ltd
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Table 9: Retail Turnover of Proposed Development

	Net sales area (sqm)	Trading density (£/sqm)	Turnover 2026 (£m)	Turnover 2031 (£m)
	[1]	[2]	[3]	[4]
Proposed Lidl Foodstore	1,364			
<i>convenience</i>	1,091	8,260	9.0	9.0
<i>comparison</i>	273	4,434	1.2	1.4
Total				10.4

Notes

- [1] Net sales area taken from application drawings, exc. checkout & tills
- [2] s/d taken from Global Data (2025) indexed to 2024 price base
- [3] = [1]*[2]/1,000,000
- [4] turnover rolled forward to 2031 based on assumed f/s efficiency increase (0% conv, 2.6% comp) (EXRPBN 23 Fig 4a (M

2024 prices

Table 10 Capacity for additional convenience floorspace at 2026

	2026
[1] Available Convenience Expenditure in PCA (£m)	61.7
[2] Survey derived turnover of stores in PCA (£m)	54.7
[3] Turnover of Convenience Retail Commitments in PCA (£m)	0.0
[4] Total PCA turnover (£m)	54.7
[5] PCA convenience expenditure capacity (£m)	7.0

Notes

[1] taken from table 4

[2] derived from table 7. Projected forward to 2025/30 on basis that facilities gain from a pro-rata growth in expenditure as set out at Table 4a.

[3] no commitments

[4] = [2]+[3]

[5] = [1]-[4]

Table 11: Benchmark capacity assessment, main foodstores, Brecon 2026

	Gross Internal Area (sqm)	Convenience Net Sales (sqm)	Convenience Benchmark Sales Density (£/sqm)	Benchmark Turnover (£m)	Survey Derived Turnover inc. inflow 2031	Over/under Trading +/- (£m)
	[1]	[2]	[3]	[4]	[5]	[6]
Co-op, Lion Street, Brecon (GOAD sqm)	1,158	850	11,226	9.5	5.9	-3.7
Morrisons Supermarket, Free Street	2,723	1,802	10,555	19.0	27.4	8.3
Aldi, The Watton, Rich Way,	1,384	1,246	11,425	14.2	20.1	5.9
Benchmark capacity of main-shop foodstores						10.6

Notes:

[1][2] app drawings

[3] GlobalData (2025) indexed linked to 2024 price base

[4]=[2]*[3]/1,000,000

[5] table plus 12% allowance for non-resident spend (inflow)

[6] =[5]-[4]

Lidl Great Britain Ltd
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Table 12: Zonal Trade Draw Assessment

	Zone					Total
		1	2	3	4	
Convenience Goods Turnover of Proposal						
Total convenience trade draw from each zone (exc.inflow)	£m	2.4	1.4	2.4	1.9	8.1
	%	30.0	17.0	30.0	23.0	100

Notes

Pattern of trade draw to proposed store based on existing shopping patterns and scale of development floorspace.
exc inflow at 10%

2024 prices

Lidl Great Britain Ltd
Land at A470, Brecon

Table 13: PCA Zonal Trade Diversion Assessment

Destination	Zone 1			Zone 2			Zone 3			Zone 4			Total (£m)	Total Diversion	
	Sub Total	%	£m	Sub Total	%	£m	Sub Total	%	£m	Sub Total	%	£m		%	£m
Zone 1															
Spar, Bryn De Winton, Brecon, LD3 9HN	0.2	1.3	0.03	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.26	0.4	0.03
Zone 2															
Asda Express (Wye Garage), Llyswen, Brecon, LD3 0UR	0.2	1.2	0.03	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.22	0.3	0.03
Boughrood Stores, Main Road, B4350, Boughrood, LD3 0YD	0.0	0.00	0.00	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.05	0.0	0.0
Bronllys Garage & Supermarket (Morrisons Daily), Hay Road, Bronllys, LD3 0LG	0.0	0.00	0.00	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.44	0.0	0.0
Clair's Wholefoods, High Street, Talgarth, LD3 0PF	0.0	0.00	0.00	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.10	0.0	0.0
Co-op, Hay Road, Talgarth, LD3 0AW	0.0	0.00	0.00	3.1	23.2	0.3	0.3	1.6	0.0	0.0	0.0	0.0	3.41	4.4	0.4
Old Railway Line Garden Centre & Farm Shop, Three Cocks, Brecon, LD3 0SG	0.0	0.00	0.00	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.02	0.0	0.0
One Stop, Liverpool House, The Square, Talgarth, LD3 0BW	0.0	0.00	0.00	0.1	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.17	0.2	0.0
WJ George Butchers & Deli Pot, High Street, Talgarth, LD3 0PD	0.0	0.00	0.00	0.1	0.8	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.12	0.1	0.0
Zone 3															
Aldi, The Watton, Rich Way, Brecon, LD3 7ED	5.4	42.0	1.0	3.1	28.4	0.4	5.3	35.0	0.9	4.2	32.0	0.6	18.04	35.3	2.9
Bargain Booze Select Convenience, High Street, Brecon, LD3 7AL	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.05	0.0	0.0
Co-op, Lion Street, Brecon, LD3 7HY	1.4	5.6	0.1	0.8	3.2	0.0	1.7	9.8	0.2	1.5	10.3	0.2	5.27	7.6	0.6
Morrisons Supermarket, Free Street, Brecon, LD3 7SE	6.9	39.5	1.0	4.0	25.0	0.3	7.6	43.5	1.1	6.0	39.6	0.7	24.5	38.2	3.1
Premier, High Street, Brecon, LD3 7AP	0.1	0.3	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.10	0.1	0.01
Shop Llangors Shop, Main Road, Llangorse, LD3 7UA	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.13	0.0	0.0
St Mary's Bakery, St Mary Street, Brecon, LD3 7BH	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.14	0.0	0.0
Tallybont Stores & Post Office, Main Road, B4558, Tallybont-on-Usk, LD3 7YJ	0.0	0.0	0.0	0.0	0.0	0.0	0.3	1.0	0.0	0.0	0.0	0.0	0.27	0.3	0.02
Zone 4															
B&M Home Store & Garden Centre, Brecon Enterprise Park, Brecon, LD3 8BT	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.4	0.0	0.06	0.1	0.01
Londis (Petrol Station), A40, Sennybridge, LD3 8PS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.4	2.8	0.1	0.40	0.7	0.1
Sennybridge Post Office, High Street, Sennybridge, LD3 8PG	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	1.5	0.0	0.21	0.3	0.03
Spar (Petrol Station), Castle Road, Sennybridge, LD3 8PS	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	1.9	0.0	0.27	0.4	0.0
Spar (Petrol Station), Church Street, Brecon, LD3 8BY	0.1	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.3	2.3	0.0	0.45	0.8	0.1
Outside Survey Area															
Asda Supercentre, Belmont Road, Hereford, HR2 7JE	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.7	0.0	0.0	0.0	0.0	0.12	0.2	0.0
Asda Supermarket, Glanvraon, Godregraig, Ystalyfera, SA9 2DE	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.03	0.1	0.0
Asda Superstore, Dowlais Top Retail Park, Merthyr Tydfil, CF48 2YF	0.1	0.5	0.0	0.9	5.9	0.1	0.4	2.3	0.1	0.2	1.4	0.0	1.51	2.1	0.2
Co-op, High Street, Llandovery, SA20 0RA	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	1.4	0.0	0.21	0.3	0.0
Co-op, Newport Street, Hay-on-Wye, HR3 5BZ	0.0	0.0	0.0	0.1	0.9	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.13	0.2	0.0
Grenfells & Sons Grocers, High Street, Crickhowell, NP8 1BD	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.4	0.0	0.0	0.0	0.0	0.06	0.1	0.0
Lidl, Bulwark Road, Bulwark, Chepstow, NP16 5JW	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.6	0.0	0.0	0.0	0.0	0.10	0.2	0.0
Lidl, Ffordd Parc Ynydderw, Pontardawe, SA8 4AG	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.03	0.1	0.0
Local shops, Merthyr Tydfil Town Centre	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.7	0.0	0.09	0.2	0.0
M&S Store, Cylarthfa Retail Park, Merthyr Tydfil, CF48 1HY	0.3	2.0	0.0	0.5	3.4	0.0	0.5	3.1	0.1	0.3	2.3	0.0	1.67	2.6	0.2
Morrisons Supermarket, Grange Road, Cwmbran, NP44 1QP	0.0	0.0	0.0	0.0	0.0	0.0	0.1	0.5	0.0	0.0	0.0	0.0	0.08	0.1	0.0
Morrisons Supermarket, Park Road, Abergavenny, NP7 5TP	0.1	0.3	0.0	0.0	0.0	0.0	0.1	0.7	0.0	0.1	0.7	0.0	0.26	0.5	0.0
Morrisons Supermarket, Station Approach, Hereford, HR1 1DN	0.0	0.0	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.03	0.0	0.0
Oakchurch Farm Garden Centre & Farm Shop, Brecon Road, Staunton on Wye, HR4 7NH	0.1	0.7	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.11	0.2	0.0
Sainsbury's Superstore, Barton Yard, Hereford, HR4 0AG	0.0	0.0	0.0	0.1	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.07	0.1	0.0
Sainsbury's Superstore, Brown Lennox Retail Park, off A470, Pontypridd, CF37 4DA	0.0	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.02	0.0	0.0
Spar, Castle Street, Hay-on-Wye, HR3 5DF	0.1	0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.06	0.1	0.0
Tesco Extra, Beacons Place, Merthyr Tydfil, CF47 0AL	0.4	2.8	0.1	0.3	2.2	0.0	0.0	0.0	0.0	0.1	0.5	0.0	0.83	1.3	0.1
Tesco Superstore, Waterloo Road, Llandrindod Wells, LD1 6BH	0.0	0.0	0.0	0.1	0.5	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.07	0.1	0.0
Tesco Superstore, Wind Road, Ystradgynlais, SA9 1AD	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.2	0.0	0.03	0.1	0.0
Waitrose, Llanfoist, Abergavenny, NP7 9LL	0.4	2.7	0.1	0.7	4.8	0.1	0.2	1.0	0.0	0.2	1.5	0.0	1.51	2.3	0.2
	15.8	100	2.4	14.5	100	1.4	17.1	100	2.4	14.3	100	1.9	61.7	100	8.1

Table 14: Trading effects of the proposed development, 2031

	Turnover 2026		Inflow	Total Turnover 2026	Turnover 2031		Inflow	Total Turnover 2031	Trade Diversion				Resultant Turnover 2031	Impact			
	Convenience	Comparison			Convenience	Comparison			Convenience		Comparison			Change 2026-31		2031 Impact	
	£m	£m		%	£m	£m		£m	%	£m	%	£m	%	£m	%	£m	%
	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]				[10]	[11]	[12]	[13]	[14]
Brecon Centre																	
Co-op, Lion Street, Brecon, LD3 7HY	5.27		10	5.8	5.25	0.00	10	5.78	7	0.6			5.16	-0.63	-10.95	-0.61	-10.60
Morrisons Supermarket, Free Street, Brecon, LD3 7SE	24.52	0.57	10	27.60	24.42	0.63	10	27.56	34	3.1	12	0.17	24.30	-3.30	-11.96	-3.27	-11.85
Premier, High Street, Brecon, LD3 7AP	0.10		10	0.11	0.10		10	0.11	0.1	0.01		0.00	0.10	-0.01	-6.90	-0.01	-6.54
Brecon Town Centre		21.72	10	23.89	0.00	24.23	10	26.65			38	0.52	26.13	2.24	9.36	-0.52	-1.96
Town centre total	29.94	22.29	10	57.45	29.83	24.86	10	60.15	41	3.72	50	0.69	55.74	-1.71	-2.97	-4.41	-7.33
Brecon out of centre																	
Aldi, The Watton, Rich Way, Brecon, LD3 7ED	18.04	0.58	10	20.48	17.97	0.64	10	20.48	32	2.9	13	0.18	17.44	-3.04	-14.86	-3.04	-14.85
Talybont Stores & Post Office, Main Road, B4558, Talybont-on-Usk, LD3 7YJ	0.27			0.27	0.27	0.00		0.27	0.3	0.02		0.00	0.24	-0.03	-9.38	-0.02	-9.02
Asda Express (Wye Garage), Llyswen, Brecon, LD3 0UR	0.22		50	0.33	0.22	0.00	50	0.33	0.3	0.03		0.00	0.30	-0.03	-8.96	-0.03	-8.61
Co-op, Hay Road, Talgarth, LD3 0AW	3.41	0.08	50	5.24	3.40	0.09	50	5.23	4.0	0.4		0.00	4.87	-0.36	-6.96	-0.36	-6.86
B&M Home Store & Garden Centre, Brecon Enterprise Park, Brecon, LD3 8BT	0.06	2.35		2.41	0.06	2.63		2.69	0.1	0.01	25	0.34	2.33	-0.08	-3.31	-0.35	-13.09
Londis (Petrol Station), A40, Sennybridge, LD3 8PS	0.40			0.40	0.40	0.00		0.40	0.6	0.1		0.00	0.35	-0.05	-13.45	-0.05	-13.11
Sennybridge Post Office, High Street, Sennybridge, LD3 8PG	0.21			0.21	0.21	0.00		0.21	0.3	0.03		0.00	0.18	-0.03	-13.45	-0.03	-13.11
Spar (Petrol Station), Castle Road, Sennybridge, LD3 8PS	0.27			0.27	0.27	0.00		0.27	0.4	0.03		0.00	0.23	-0.04	-13.45	-0.03	-13.11
Spar (Petrol Station), Church Street, Brecon, LD3 8BY	0.45			0.45	0.44	0.00		0.44	0.7	0.1		0.00	0.38	-0.06	-14.06	-0.06	-13.73
Other outside PCA									10	0.9							
Inflow									10	0.9	12	0.17					
									100	9.0	100	1.4					

Notes
[1] [2] taken from table 7/8
[3] Allowance for inflow (Non PCA spend)
[4] = [1]+[2] inc. [3]
[5]&[6] Allowance made for turnover of existing facilities to gain from pro-rata growth in expenditure to 2030 in line with Table 4a/5a.
[8]=[5]+[6] inc. [7]
[9] CS estimate reflective of existing stores trading position
[10] =[8]-[9]
[11]=[10]-[4]
[12]=[10]-[4]/[4]*100
[13]=[10]-[8]
[14]=[10]-[8]/[8]*100



Appendix D – The Lidl Effect

The Lidl Effect

FY24

**Lidl GB's
socioeconomic impact**



A proud and major contributor to Britain

Ever since our first store opened in Great Britain in 1994, Lidl has stood for high-quality products at affordable prices – and much more besides.

We are proud to be a major British investor, creating high-quality jobs, offering support for British farmers and suppliers, contributing to local national tax revenues and meaningfully supporting the communities we serve. This is the **Lidl effect** – creating value beyond the price tag.

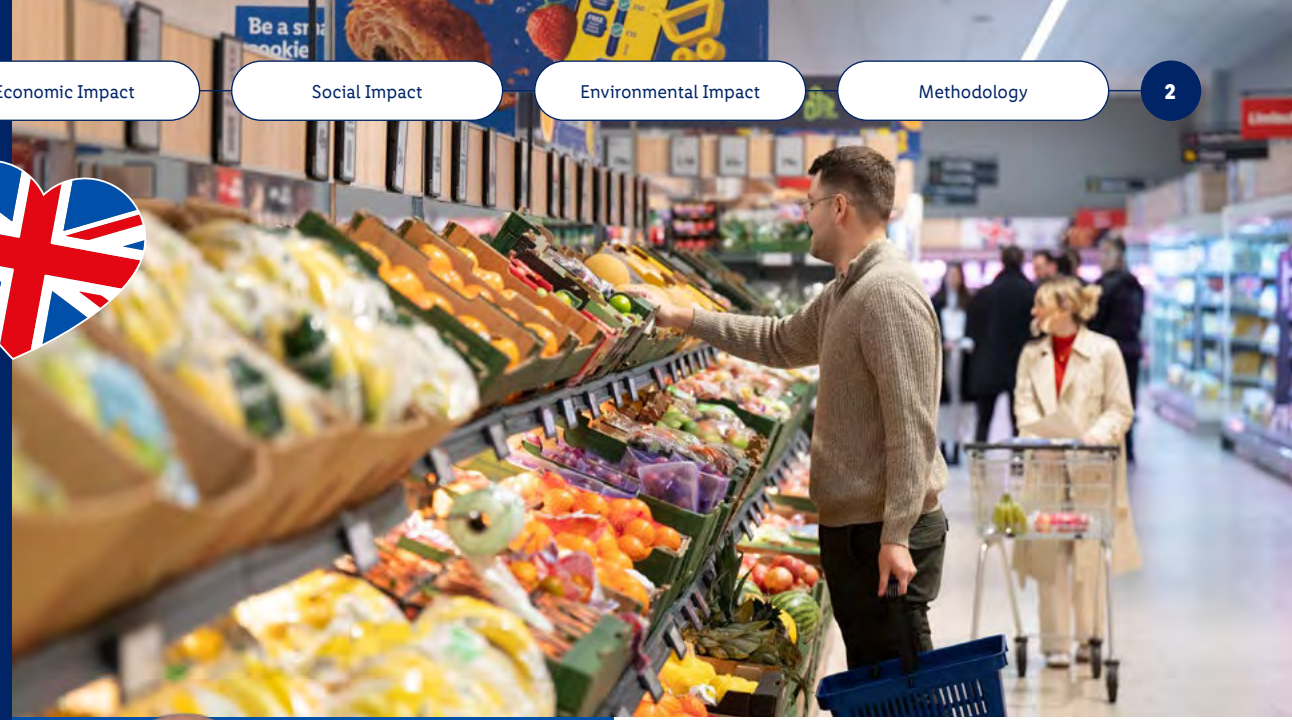
So as we open our 1000th GB store in 2025, we're not only celebrating another new Lidl, but the socioeconomic impact it will make.

Our new colleagues are joining a workforce of over 35,000 people of all ages, backgrounds, ethnicities and skills. The store's contribution will further add to the £14.5 billion in Gross Value Added (GVA) Lidl generated for the GB economy in 2024. The products it stocks will be more good news for British suppliers, who already supply around two-thirds of the products we sell.

It will also help to fund the vital work of the NSPCC and Childline, and work with organisations tackling food insecurity through Neighbourly and His Church. In 2024 alone, we donated 18.5 million meals through a combination of food surplus and customer donations, while continuing to invest in educational programmes and food redistribution initiatives nationally.

Fuelled by the passion of our colleagues and the trust of our customers, this report shows that the **Lidl effect** is not only significant – it's growing. And with each passing year, we're aiming higher, to help shape a brighter future for all our stakeholders.

Ryan McDonnell
CEO of Lidl GB



See our **Beyond the basket** report for more insights.

Lidl GB Sustainability Report
FY23/24

**Beyond
the basket**

FY23
and
FY24



The Lidl effect in numbers



Adding value to the GB economy?

That's more to value

Our contribution included a **£474m[†]** investment in new stores and distribution centres.

£14.5bn

generated in Gross Value Added (GVA)

by Lidl and our supply chain, in 2024 alone.



A major job generator

From the stores we operate to the supply chain that supports us, Lidl's GB presence has generated **281,813 jobs.**



Backing Britain's producers

Around 2/3[†]

of all products sold are sourced directly from British suppliers.*

* Based on FY24 purchase value from British-based suppliers; includes own brand and branded core and promotional lines.
† This symbol denotes where a KPI has undergone limited assurance. The full assurance statement is available here: <https://corporate.lidl.co.uk/sustainability/sustainability-reports>



Giving back



Since 2017, we've raised **£10m** through our NSPCC partnership.

We also donate surplus food from our stores to help make good healthy food accessible to families who need support.

In 2024, we donated more than **18.5m meals[†]** through a combination of surplus food and customer donations, via Neighbourly and His Church. These meals supported a wide range of local causes including charities, food banks, community cafés and soup kitchens. Since 2020, we've increased our local distributions four fold.

Our £14.5bn economic impact

From Dingwall in the highlands of Scotland to Penzance in Cornwall, Lidl's GB-wide network of stores generates a considerable economic impact.

By championing British suppliers, creating high-quality job opportunities, and investing in retail operations and infrastructure across Great Britain, we make both a direct and indirect impact on the British economy.

Which break down like this:

£1.4bn[†]

in **direct** Gross Value Added (GVA) was generated by Lidl GB in 2024

£9.6bn

was created through our domestic suppliers

£3.5bn

was generated through international suppliers



Result: A total economic contribution of **£14.5bn**

How £1 becomes £10: the multiplier effect

For every £1 of direct value created by Lidl GB – through our own operations, investments and employment – the benefits ripple out and grow. Our British suppliers generate an additional £7, with a further £2 added across the wider value chain.

These figures reflect our broad impact and the role we play in supporting long-term economic development across Great Britain.



Investment = commitment

We're investing at the heart of British communities to create economic impact and strengthen its ripple effect in the process.

In 2024, as part of our expansion in Great Britain, Lidl invested

£474m

in developing new stores and distribution centres, creating new jobs, supporting local suppliers and boosting local economies.

And in November 2025, we proudly opened our

1,000th

store, a landmark and symbol of our growth and commitment.

[†] This symbol denotes where a KPI has undergone limited assurance. The full assurance statement is available here: <https://corporate.lidl.co.uk/sustainability/sustainability-reports>

More than a retailer: a significant taxpayer

Lidl International and Lidl GB firmly believe that every responsible business must pay its fair share of tax, to fund vital public services such as the NHS, education, transport and state pensions.

In 2024, Lidl GB paid over £1 billion in taxes.[†] That's the equivalent of almost half of England's annual agricultural subsidies (£2.56 billion in 2024).

[†] This symbol denotes where a KPI has undergone limited assurance. The full assurance statement is available here: <https://corporate.lidl.co.uk/sustainability/sustainability-reports>

We paid
over
£1bn
in taxes
(FY24)



Lidl GB's tax contribution

2024: Lidl collected £335 million in taxes on behalf of the Government and paid £697 million in taxes.

As we grew our business in 2024, our contribution to National Insurance rose to £77.1 million (FY23: £63.4 million), giving further support to key public services.



Tax borne
£697m

Tax
collected
£335m

Billions in backing for British farming

In 2024, Lidl GB invested:

£5.8bn
in British food and farmed products, with...

around 2/3
of products sourced directly from GB-based suppliers – significantly strengthening our British supplier network.*

And this is just the start. Over the next five years, Lidl has committed to investing a further

£30bn
in British food and farming!

Read more on Backing British Farming commitments [here](#).

* Based on FY24 purchase value from British-based suppliers; includes own brand and branded core and promotional lines.

We invested
£5.8bn
in British food
and farmed
products

An employer of choice

Lidl strengthens the communities we serve, not only through our products and services, but as a large-scale, high-quality employer. Across Great Britain, we directly employ around 35,000 colleagues.[†]

Our colleagues are the backbone of our business, and their success is our success. Guided by our core values, we foster a culture rooted in fairness, respect and collaboration – and driven by open communication and mutual support.

Since becoming the first UK supermarket to provide a Living Wage in 2015,¹ we are committed to upholding our values. We now offer some of the highest entry wages in the sector, stable contracts and clear development pathways for everyone who chooses to join us.

We employ over
35,000
colleagues

We are guided by our values



6.84%
year-on-year
increase in our GB
workforce[†]

Every role creates more

Lidl GB ranks in the top five Lidl countries by headcount, representing around 12% of the Company's global workforce.

We also benefit from the strength, expertise and network of the Schwarz Group. One of the world's largest retailers, they are also Europe's No. 1 in food retail.

In turn, our size means that positive socioeconomic impacts are amplified along the supply chain. For example, for every role at Lidl GB, five additional jobs are supported by our British-based direct suppliers. And when the broader value chain is factored in, this impact grows to as many as four additional roles sustained for each Lidl GB position.

In all, our GB business sustains around 281,813 jobs across our direct operations and the wider supply network.

[†] This symbol denotes where a KPI has undergone limited assurance. The full assurance statement is available here: <https://corporate.lidl.co.uk/sustainability/sustainability-reports>

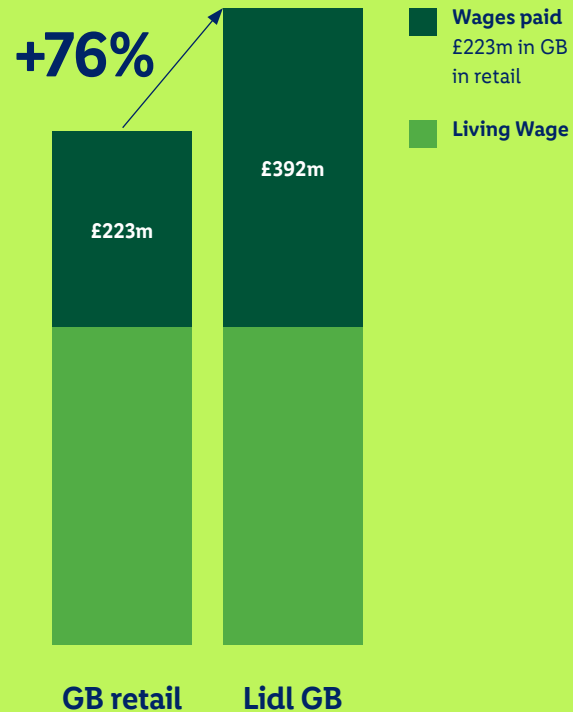


281,813
jobs supported
from farm to
factory

¹ Source: <https://www.livingwage.org.uk/news/lidl-become-first-supermarket-pay-living-wage>

Competitive pay

We take our responsibility to colleagues seriously, and competitive pay is central to this commitment. For example, during FY24, this resulted in pay awards totalling £392 million above the UK Living Wage benchmark.



Mean gender pay gap: reduced

In 2024, we cut our mean pay gap to 8.0% – well below the UK average of 13.1%* – showing real progress towards fairer pay and equal opportunity.

* Source: ONS



Mean
gender pay gap
reduced to
8.0%

Median gender pay gap: (there isn't one)

Lidl GB's median gender pay gap remained at 0% for the fourth year in a row, highlighting our leadership in pay equity and commitment to fairness and equality.

For further information, see our Gender Pay Gap Report 24/25.

Median
gender pay gap
0.0%
for 4 years
running

Fair wages: the foundation of our supply chains' success

Lidl GB believes fairness is fundamental to good business, and one example is the pioneering tool we are rolling out across our banana supply chain, to help close living wage gaps on plantations.

Developed with the Sustainable Trade Initiative (IDH), it identifies the gap to local living wages, calculates Lidl's share of extra payments due, and empowers suppliers to pass this on through wages, bonuses or vouchers.

See our [Beyond the basket report](#) for the full story.



Community food insecurity: we're on it

For many, affording good, healthy food is a constant challenge – and Lidl GB is committed to being part of the solution.

In 2024, we donated 18.5 million meals for 6.8 million people via Neighbourly and His Church. This is broken down as 16.6 million meals from our food surplus and 1.96 million meals from our customers 'Good To Give' food donations.

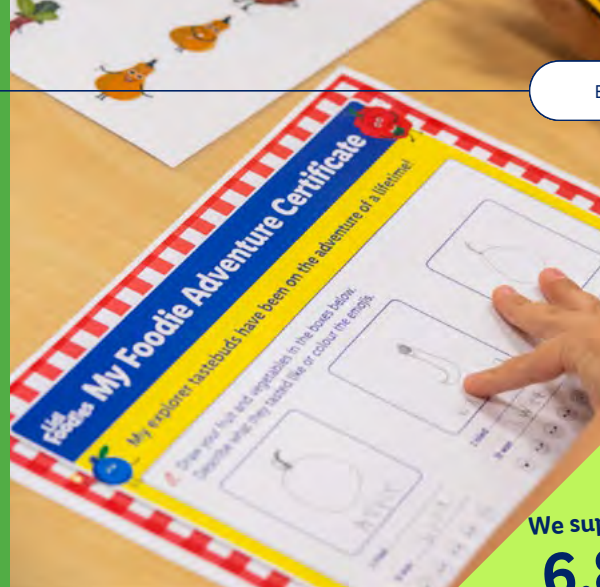
The Neighbourly donations:

Represent food worth around
£31.9m

Saved almost
28,465 tCO₂e
emissions related to food waste

Helped to reduce incremental costs to the NHS by an estimated
£79.5m^{*†}

^{*} £79.5 million is the estimated FY24 social value figure for Lidl GB's edible product redistribution programme, calculated by Neighbourly based on data, evidence and financial proxies assured by CHY Consultancy. Based in part on a report by BAPEN, the figure reflects the estimated prevention of additional costs to the NHS for subjects with malnutrition and obesity as a result of the meals donated.



We supported
6.8m
people through
healthy meal
donations

Discovering healthy – early

Lidl has invested £500,000 over two years in Lidl Foodies, a nationwide schools programme designed to spark a lifelong love of healthy eating. Delivered by teachers through fun, hands-on workshops, the initiative brings fruit and vegetables to life for primary school children across the UK. The programme is completely free for schools and aims to reach 250,000 pupils. By the end of FY24, over 150,000 children from 1,000 schools had already taken part – with more than half coming from Schools in Need. We're here to 'Vegucate' the nation and make healthy food exciting, accessible and enjoyable for every child.



Partnering for impact

Through Neighbourly – a platform connecting our stores to over 2,800 good causes nationally – His Church, and initiatives such as the Lidl Community Fund, toy giveaways and our Lidl Foodies education programme, we reduce waste and help families towards healthier futures.



18.5m
meals donated



£2.08m
generated through
fundraising



£599,429
in grants for 688
causes supported



85,000
toys donated

[†] This symbol denotes where a KPI has undergone limited assurance. The full assurance statement is available here: <https://corporate.lidl.co.uk/sustainability/sustainability-reports>

Charity partnering

The vital priorities of the safety, mental health and wellbeing of Britain's children, and the success to date of our work with the NSPCC, led us to an important decision in 2025: we decided to extend our partnership with Britain's leading youth charity for another five years.

In 2024 alone...

£2m[†]

was raised by our colleagues and customers to give a vital boost to the NSPCC's funding and ability to protect vulnerable children, right across the country.

To date...

£10m

has been invested to support thousands of children. And our renewed commitment will ensure this vital work continues well into the future.

[†] This symbol denotes where a KPI has undergone limited assurance. The full assurance statement is available here: <https://corporate.lidl.co.uk/sustainability/sustainability-reports>

Our donations funded...



13

Childline bases around the UK, supported through Lidl, and the entirety of Childline's night time service



38,302

counselling sessions with young people, delivered by Childline



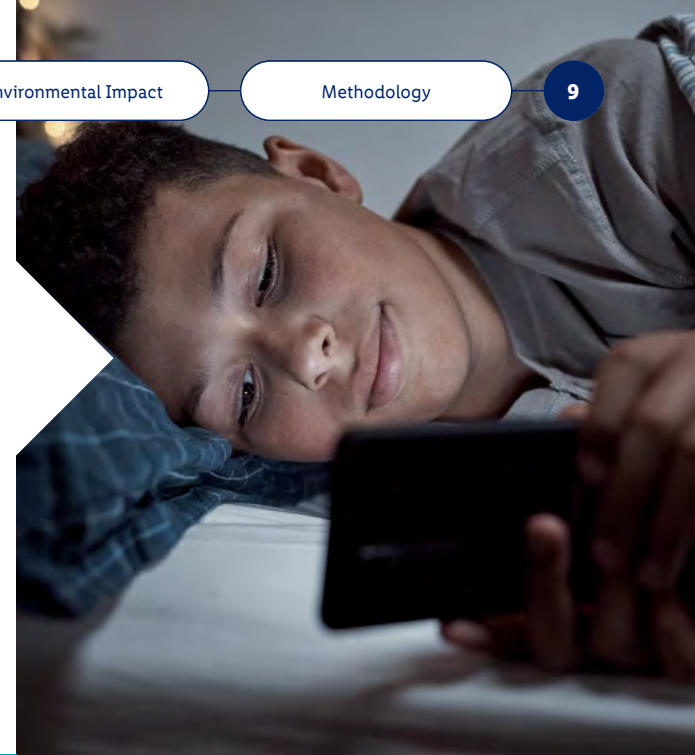
1,452

initial assessments for young people who needed additional support

Childline counselling: there when it's needed

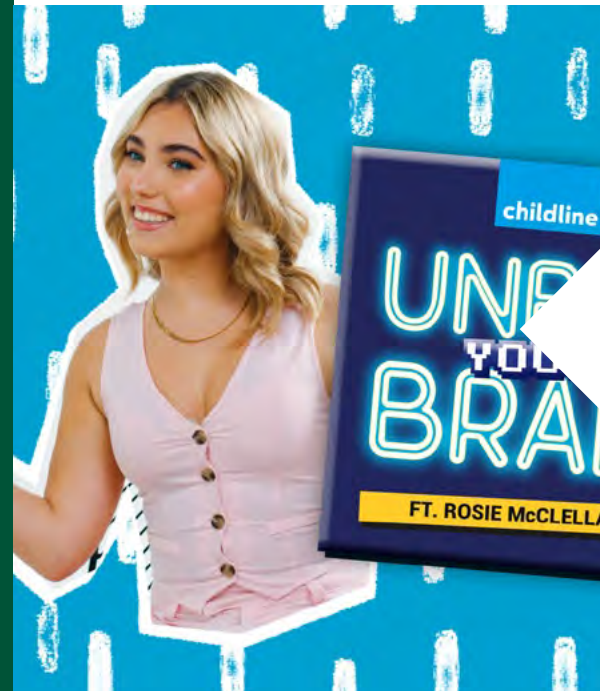
Lidl's support enables tens of thousands of Childline's counselling sessions for children and young people.

Childline is in constant demand: on average, it receives a call every 45 seconds, usually from children who need help with their mental health and emotional wellbeing. Our partnership helps to make sure they have someone to turn to – whatever difficulty they're facing, 24/7.



Unbox Your Brain campaign

Social media is a wonderful thing – until it isn't. There is a lot of misleading, and potentially harmful, mental health content on social media platforms like TikTok. Lidl therefore funded a nationwide campaign, aimed at reaching young people with sound and reliable advice. By engaging influencers and using creative formats, we directly address one of the biggest risks to young people's mental health: exposure to harmful digital content.



More impact, through less impact

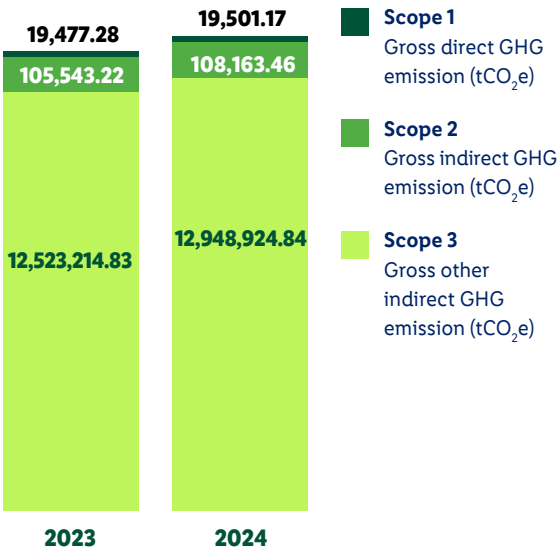
Our bold environmental reduction goals

In line with our parent Schwarz Group’s official net zero commitment to the Science Based Targets initiative (SBTi), Lidl has defined a clear long-term climate strategy. By 2030, we aim to cut our operational emissions (Scope 1 and 2) by 70% against a 2019 baseline – a decisive move towards meaningful environmental impact and corporate responsibility.

Find out more on our website and in our latest Sustainability Report.

With 13.1 million tCO₂e greenhouse gases emitted in 2024, our increased carbon footprint reflects the scale and growth of our operations – and the responsibility that comes with it. We took targeted steps in 2024 to strengthen our climate strategy, reducing future emissions and increasing our positive societal impact over time. That’s why we’re driving change across all three scopes – from our own operations, to the energy we source, to the suppliers we work with.

Greenhouse gas (GHG) emissions



The mission to cut emissions

- ◆ Our largest warehouse, opened in Luton in 2023, is powered by biogas and solar PVs, covering electricity needs seasonally.
- ◆ We eased freezer temperatures from -24°C to -22°C (Oct 2024 – March 2025), cutting warehouse freezer power use by ~9% a year.
- ◆ Lidl GB significantly expanded its Battery Electric Vehicle (BEV) fleet by 16% between FY23 and FY24 by making more BEV options available to colleagues.

CO₂ is just the start

National Insights



£1.75m
biodiversity net gain payments



7,883t
food waste avoided through surplus redistribution and operational efficiency measures



£11.8m
towards improving recycling infrastructure through Packaging Recovery Notes (PRNs)



94.6%
of our own-label and branded product packaging that is recyclable, reusable, refillable or renewable*



541,312 MWh
energy saved through efficiency measures



See our **Beyond the basket** report for more insights

* Based on % tonnage of packaging that is eligible to carry on pack recycling label 'recyclable' or 'recycle at collection point' logo

Methodology

Sources of information

This report's analysis draws primarily on Lidl's internal datasets, including store-level sales, payroll for stores, offices and distribution centres, procurement from domestic and international suppliers, and operational indicators such as greenhouse gas emissions, food waste and energy consumption. Tax contribution figures were taken from Lidl's most recent Annual Report and Financial Statements 2024.

Internal data was validated and supplemented with publicly available macroeconomic data sources. Supplier records were mapped to economic sectors, and macroeconomic datasets (including multi-regional input/output tables, the Business Register and Employment Survey, and labour market statistics) were integrated into the analysis.

Scope of data reporting

The data in this report differs from the data in Lidl GB's Financial Statement and Sustainability Report as the Socioeconomic Report encompasses the following two legal entities:

- Lidl GB (LGB) – retailing grocery products in Great Britain
- Lidl UK Trading (LUKT) – facilitating the purchase of goods from overseas and the subsequent sale to Lidl GB.

Gross Value Added (GVA)

The economic impact assessment is based on two components: direct and indirect Gross Value Added (GVA):

- Direct impact reflects the GVA created through Lidl's own activities, including demand for goods and services sold in stores and online, measured through the income approach – aggregating compensation of employees, gross operating surplus (profits plus capital consumption via depreciation and amortisation), and taxes on production. Direct GVA is calculated nationally from Lidl's Annual Report and locally from store sales.
- Indirect impact captures the global effects generated through Lidl's procurement from GB and international suppliers and their supply chains. This covers purchases for resale as well as goods and services acquired to support operations. Supplier data is mapped to sector and location, and multi-regional multipliers are applied to estimate additional GVA across the global economy. The report excludes induced GVA and employment effects, and includes only procurement-based indirect impacts, ensuring verifiable data that safeguards credibility, transparency and compliance.

Employment

The employment impact assessment considers both direct and indirect effects.

Direct employment represents the jobs provided by Lidl itself across stores, offices and distribution centres. Indirect employment reflects additional jobs supported in Lidl's GB and international supply chains through the Company's procurement of goods and services. To quantify these impacts, employment multi-regional impact multipliers were applied to estimate the additional jobs created across the global economy.

Living wages & gender pay gap

The methodology compares actual wages with locally defined living wages and measures the gender pay gap as the average earnings difference between men and women, following national law.

The mean gender pay gap is measured by taking the difference between average hourly earnings (excluding overtime) of men and women, as a proportion of men's average hourly earnings. The median gap is calculated by taking the midpoint of the highest and lowest hourly pay in the organisation, and comparing the respective midpoints paid to men and women.

Direct effects are based on internal data, while indirect effects are estimated through sector- and country-level wage allocations, using multi-regional impact multipliers. All employees are adjusted to full-time equivalents.

Methodology continued

Environmental data

Environmental indicators are measured using Lidl's internal reporting systems, which track (food) waste, energy use, water consumption and greenhouse gas emissions across operations. Data is collected through monitoring and supplier reporting, and then aggregated and validated against national standards.

Indirect (upstream) impacts are estimated through carbon accounting methods according to the GHG Protocol or by applying multi-regional impact multipliers.

Benchmarking

Benchmarks are established in several ways. In most cases, when referencing a typical competitor or statistical baseline, this involves constructing a hypothetical company of comparable size (measured by production value, GVA or full-time-employees) operating in the same market and year, with results calculated using respective multi-regional impact multipliers.

Neighbourly

Through our partnership with Neighbourly, we capture and report on a range of induced social impacts, including meals redistributed, funds raised, toys donated and community grants delivered. In addition, financial impacts such as estimated NHS savings are calculated using recognised sources and programmes, including the Waste and Resources Action Programme (WRAP) and the British Association for Parenteral and Enteral Nutrition (BAPEN).

TCO₂e per meal calculation: Each of the food catalogue items has its average tray weight and average CO₂ per tray. For food catalogue items in general 1kg item weight ~ 3.611kg CO₂ (which is based on the average saving of 3,611kg CO₂ e per tonne from diverting food surplus away from anaerobic digestion), e.g. Fruit & Veg weight is 5kg per tray, CO₂ is 18.055kg per tray. Our estimated tray size: 58cm(l), 40cm(w), 15cm(h).

NSPCC

Through our partnership with the NSPCC, impacts are measured in terms of access to child protection services, counselling, and safeguarding support delivered via programmes such as Childline. Data provided by the NSPCC is used to capture outcomes such as improved mental health support and community resilience, while in-kind donations and colleague fundraising are included to reflect the wider social value of the collaboration.

WRAP

The estimated money saving from food donations is based on WRAP analysis of the DEFRA Family Food Survey, using the total per-person expenditure and weight of food purchased to derive the price-per unit. The scope used is the total household food purchases, excluding takeaway food. This excludes drinks and milk. For estimating the price-per unit in 2022, the most recent available Family Food estimates were adjusted using Consumer Price Index food figures. The weight of a meal is assumed to be 420g. The figure is rounded.

Limitations

Input/output modelling is the standard method for estimating the wider economic and employment effects of company activities, but it carries certain limitations.

The input/output tables provide only a static view of the economy for a given year; in this analysis, 2023 tables were used and adjusted for inflation to present values.

The approach measures the gross value added and employment supported by Lidl's operations but does not include a counterfactual scenario of how spending might be redistributed in the absence of Lidl.

Supplier classification may also create uncertainty, as sector codes do not always capture the full scope of a supplier's activities.

As with any large-scale modelling exercise, results are subject to data quality constraints and should be interpreted as indicative estimates rather than exact figures.

Assurance

Certain metrics within this Report have been independently assured by Forvis Mazars.

+ This symbol denotes where a KPI has undergone limited assurance. The full assurance statement is available here: <https://corporate.lidl.co.uk/sustainability/sustainability-reports>