



Planning & Retail Statement **PAC DRAFT**



Client Name: Lidl Great Britain Ltd

Site Address: Land at Park House Court, Tenby

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SECTION 1

Introduction



1.0 Introduction

- 1.1.1 This Planning and Retail Statement (PRS) has been prepared by CarneySweeney (CS) on behalf of the applicant, Lidl Great Britain Ltd, in support of a full planning application for the erection of a Class A1 retail foodstore with surface level car parking, landscaping and all associated development at land at Park House Court, Narberth Road, Tenby.
- 1.1.2 This report focuses on the general planning and retail policy issues associated with the application proposals. It is intended to assist Pembrokeshire County Council in its determination of the application and has been prepared in accordance with the requirements set out in the Local Development Plan, Future Wales: The National Plan 2024 and Planning Policy Wales.
- 1.1.3 This report should be read in conjunction with all other elements of the application as listed on the application covering letter, the contents and findings of which are referred to where relevant and appropriate.
- 1.1.4 The remainder of this report is structured as follows:
- Section 2 provides a detailed description of the site and its surroundings; the application proposals and the applicant's business model;
 - Section 3 provides a summary of the overarching Planning Policy Context;
 - Section 4 sets out an assessment of existing retail provision;
 - Section 5 considers the need for the proposed development;
 - Section 6 considers the application of the sequential test;
 - Section 7 provides an assessment of retail impact;
 - Section 8 outlines the principal non-retail planning considerations; and
 - Section 9 presents a summary of the overall conclusions.



SECTION 2

The Proposed Development



2.0 The Proposed Development

2.1 The Application Site and surroundings

- 2.1.1 The application site ('the Site') is on land at Park House Court, Narberth Road, Tenby. The Site extends to approximately 0.82ha. It is located at the northeast of the Park House Court Nursing Home site and adjacent to the A478 Narberth Road, south of New Hedges. The Site is shown on Figure 1.0 below.

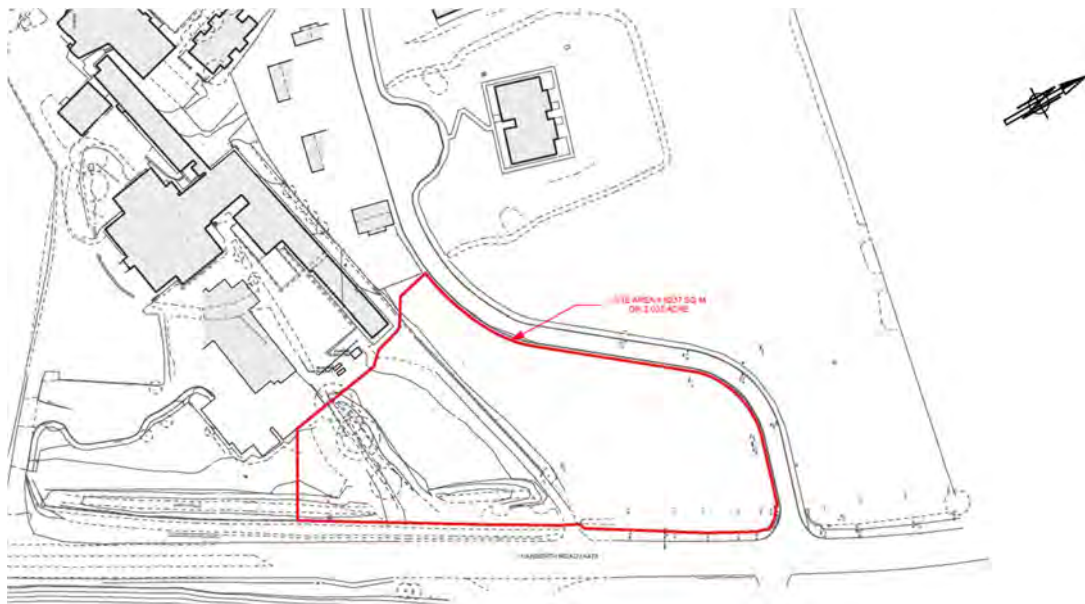


Figure 1.0: Extract of Site Location Plan (Site outlined in red)

- 2.1.2 The Site is currently unused amenity/ pastureland associated with the Nursing Home. The Site is bound on three sides by roads. To the east lies the A478, separated from the Site by a small embankment, ditch and a mix of vegetation, trees, hedges and post and rail fencing. To the north and west, the Site is open to Garden Meadows Park, which leads to a residential development to the west and a car park for the nearby church to the north. The boundary with the Nursing Home to the south is mainly open, with some lengths of fencing and trees/ vegetation. The wider surrounding context is open countryside.
- 2.1.3 The Site is currently accessed via an informal priority junction arrangement, directly along the A478. This access track bisects the Site.
- 2.1.4 The Site lies beyond the Tenby settlement boundary within open countryside, albeit on a developed site in proximity of the New Hedges settlement boundary (c.150m at its nearest point). The Site lies beyond 300m from the nearest centre (Tenby) and is therefore in an out of centre location in retail policy terms.
- 2.1.5 The Site lies within the Coal Mining Reporting Area and Surface Coal Resource as identified on the Coal Authority Interactive Map. The Site is however excluded from the Pembrokeshire County



Council (PCC) Coal Resource Area designation (Local Development Plan Policy GN.22). The Site lies within Flood Zone A (i.e. considered to be at little or no risk of fluvial or coastal/tidal flooding) within the Natural Resources Wales (NRW) Development Advice Map and does not lie within any Flood Risk Zone within NRW's Draft Flood Map for Planning.

- 2.1.6 The Site is not affected by any conservation areas or listed buildings. The nearest heritage assets are a series of Grade II Listed buildings associated with Knightson Farm, c.500m from the Site (Cadw refs: 6014, 17397 and 17398). The Site does not lie within a Special Area of Conservation (SAC) or Special Landscape Area (SLA), nor any other nature conservation, landscape or biodiversity designations. It is also not affected by any public rights of way (PRoW).
- 2.1.7 The Site slopes from south to north, with the high point situated on the top of a raised bank which follows Narberth Road.

2.2 Active Travel and Site Accessibility

- 2.2.1 The nearest bus stop is around 400m north of the Site (within the Institution of Highways and Transportation suggested walking distance), in New Hedges, which provides services to and from Tenby, Haverfordwest, Pendine, Narberth, Kilgetty and Saundersfoot. The nearest train station is Tenby, around 2km south of the Site.
- 2.2.2 In the vicinity of the site, footway (shared cycle/pedestrian use) is provided along the northern edge of Garden Meadows Park, which continues west into the Park Court residential development. This footway connects into an onward pedestrian footway along the western edge of the A478, which continues to the north for around 100m and for around 50m to the south of Garden Meadows Park. These connect to continuing footways on the eastern side of the A478 and provide routes to New Hedges and Tenby (the latter via Slippery Back on-road rural track route). Both New Hedges and northern elements of Tenby lie within the maximum walking distances to local facilities suggested by the Chartered Institute of Highways and Transportation.
- 2.2.3 The footways form part of the longer National Cycle Network Route 4 which continues north through New Hedges and Saundersfoot, and south through Tenby. The entirety of the Tenby and Saundersfoot areas are within the mean average length for cycling journeys (4km).

2.3 Surrounding Context

- 2.3.1 Tenby is a historic centre within the administrative boundary of Pembrokeshire Coast National Park Authority (PCNP). It is identified as a 'Town Centre' (Tier 1 Settlement) within the retail hierarchy in the PCNP adopted Local Development Plan 2 (PCNP LDP2) (Policy 56). The PCNP LDP2 describes Tenby as a Service and Tourism Centre (Policy 2). The town serves both the National Park and wider Pembrokeshire County.
- 2.3.2 Growth of the northern edge of Tenby, close to the Site, is expected over the next few years due to residential approvals within the area. This includes:



- Approval for 144 dwellings on land at Brynhir, Old Narbeth Road which was granted outline permission in 2020 (ref: NP/19/0361/OUT), with reserved matters approved in September 2024. Ref: NP/23/0458/RES. This development is accessed via Narberth Road, around 350m south of the Site.
- Approval for 14 dwellings on land west of Narberth Road, which was granted outline permission in April 2024. This development lies around 750m from the Site, south along Narbeth Road. Ref: NP/17/0722/OUT

2.3.3 To the north of the Site lies New Hedges which is identified as a 'Service Village' within the settlement hierarchy (Local Development Plan Policy SP 12). New Hedges is characterised by residential development, caravan holiday parks and some modest commercial development such as a restaurant, village hall and post office.

2.4 Planning History

2.4.1 A review of Pembrokeshire County Council's online records reveals previous applications associated with the adjacent Park House Court Nursing Home. This planning history is summarised in Table 2.1 below.

Table 2.1: Planning History

Reference	Description	Decision
05/0893/PA	25 bed building for nursing home accommodation and bed space for Tenby Cottage	Approved July 2006
10/0696/PA	Extension of existing Park House Court (Class C2) healthcare premises to provide 132 mixed tenure serviced care units	Approved November 2013
15/1224/PA	Variation of conditions 3 and 4 of planning permission ref. 10/0696/PA to allow additional time for submission of reserved matters and commencement of development	Approved May 2016
19/0178/PA	Variation of condition 3 of planning consent ref 15/1224/PA to allow an extension of time for the submission of Reserved Matters	Approved July 2019
20/0142/PA	Modification of conditions 2-4, 7-11, 13 and 15-17 of planning consent ref 19/0178/PA to allow phased submission of reserved matters and phased delivery (including extension of time for submission of reserved matters by two years)	Approved August 2020
22/0289/PA	Variation of conditions 3 and 4 of 20/0142/PA to allow for an extension of time for submission of reserved matters by two years	Approved May 2023



2.6 The Proposed Development

2.6.1 The proposed development seeks planning permission for the following:

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

2.6.2 The proposals are shown on the Proposed Setting Out Plan enclosed at **Appendix A** and comprise:

- The erection of a Class A1 food store of total floorspace of 1,969sqm (GIA) (c.1,347 sqm net sales);
- 102 car parking spaces including 9 parent and child, 6 accessible and 2 Electric Vehicle charging bays;
- Covered cycle spaces; and
- Associated drainage and landscaping.

Siting and Appearance

2.6.3 The applicant has considered a range of development design options to best respond to the constraints and opportunities of the site. Further details are set out in the accompanying Design and Access Statement.

Access and Parking

2.6.4 Vehicle access and egress will be taken from a new access off the existing Garden Meadows Park, off the A478. Pedestrian routes will be formed from both the A478 and Garden Meadows Park into the site.

2.6.5 The proposal provides 102 car park spaces, including 9 parent and child, 6 accessible and 2 electric vehicle spaces. The proposed accessible spaces and parent and child spaces will be located close to the entrance of the new store. Cycle parking will be provided close to the store entrance to provide convenience for customers travelling by bicycle.

Deliveries and Servicing

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

2.6.7 A swept path analysis has been undertaken to ensure that service vehicles can safely access the service facilities without conflict with cars parked at the store.



Boundary Treatment and Landscaping

- 2.6.8 Careful consideration has been given to the boundary treatment and landscaping taking account of the surroundings.
- 2.6.9 The proposals include a new landscaping scheme incorporating soft landscaping along the two roads surrounding the site. The landscaped boundaries will act as a visual barrier along the roads and present some screening opportunities, providing a visually appealing scheme for both residents and retail users.

2.7 Lidl Operating Model

- 2.7.1 Lidl is now exceptionally well established in the UK with the Company operating in excess of 950 stores from sites and premises both within and outside town centres. Its market share continues to increase substantially, and the Company is expanding its store network considerably. The UK operational model is based firmly on the success of Lidl's operations abroad with more than 10,800 stores trading across Europe.
- 2.7.2 Lidl was characterised by the Competition Commission in its Groceries Market Investigation Final Report in 2008 as a Limited Assortment Discounter (LAD). The Commission said that LADs: "carry a limited range of grocery products and base their retail offer on selling those products at very competitive prices. The three major LADs in the UK are Aldi, Lidl and Netto. Each ... carries in the region of 1,000 to 1,400 product lines in stores ranging from 500m² to 1,400m² (stores of a similar size operated by a large grocery retailer generally carry about 5,000 products). Aldi, in large part, carries only own label goods while both Lidl and Netto carry larger volumes of branded products".
- 2.7.3 Whilst this report is over ten years old, its description of the LAD business model remains sound, albeit Netto no longer trades in the UK; the size of Lidl and Aldi stores has increased to some extent; and the number of product lines sold has increased to circa 1,600 to 2,000. Nonetheless, the clear points of differentiation between the LAD operators, the main grocers (Tesco, Asda, Sainsbury's, Waitrose and Morrisons) and convenience stores remain clear and readily identifiable, with the LAD operators selling limited ranges of staple products and catering predominantly for main food shopping needs.
- 2.7.4 The Commission, Inspectors and Secretary of State have expressly recognised that LADs offer particular benefits of quality and value. Lidl sells a limited number of product lines, but all of its business practices are aimed at driving down costs so that it can provide exceptional value for money across the whole of its product range. Lidl typically sells around 3,000 product lines, whereas the main grocers (Tesco, Asda, Sainsbury's & Morrison's) will sell in excess of 35,000 products. The number of value lines that the main grocer's stock is limited, whilst the whole of the LAD business model is geared to providing exceptional value.



- 2.7.5 Consumers no longer assume that the quality of goods sold by LAD operators must be low to achieve cheap prices. Indeed, Lidl is able to offer very competitive prices whilst keeping the quality of its goods extremely high and achieves this through a combination of:
- tremendous buying power as a result of the scale of its operations across Europe;
 - a concentration on own brands (now about 80% of its product range) which avoids passing on the cost of brand name marketing to the consumer;
 - its decision to stock a much more limited product range than others, concentrating on goods that form a very high proportion of the weekly food shopping needs of most households;
 - operating systems that reduce operational costs; and
 - simple product display and stock handling procedures.
- 2.7.6 The ability to offer a consistent range of high-quality goods at competitive prices enables Lidl to distinguish itself from other operators that may be perceived as operating similar business models. The whole of the Lidl product range delivers value whereas the major grocers only stock own brand and 'value' lines amongst their branded and premium products.
- 2.7.7 Lidl does not stock convenience goods such as tobacco, or individual confectionary items and stocks limited pre-packed fish and meat and individual fruit and vegetable products. Lidl also does not provide services such as a post office, pharmacy, delicatessen, financial products or other in-house facilities. The result is that there is limited overlap with conventional supermarkets.
- 2.7.8 Lidl stores offer a limited range of non-food items which typically occupy about 20% of the sales area. These items tend to be one-off specials offered on the basis of 'when it's gone, it's gone', with the range changing on a weekly basis. There is no standard or constant comparison goods range offered in store and the special items are wide ranging including anything from sports equipment to electrical items.
- 2.7.9 On the issue of sustainability backing British suppliers continues to be at the forefront of Lidl's plans with total investment in British food and farming businesses to hit £17bn by 2025.
- 2.7.10 Since 2016, Lidl has reduced its food waste by almost half (43%). This means it is well on track to hit its 50% reduction target by 2030. Providing more meals to charities - including over 6 million in 2022 which surpasses the discounter's target - has helped reach this milestone. In 2022, Lidl also prevented nearly 9,000 tonnes of food waste through the sale of 1.7 million 'Too Good to Waste' boxes. Reducing other forms of waste has also been a key priority and 95% of Lidl's own-brand packaging is now recyclable, reusable, renewable or refillable.
- 2.7.11 Overall, Lidl has cut the amount of plastic packaging across its own-brand ranges by 29% since 2017 - with its sights set on achieving a 40% reduction by 2025. Through its partnership with Prevented Ocean Plastic, the discounter has also stopped the equivalent of 15 million plastic bottles from entering the ocean.



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

2.8 Pre-application Consultation and Engagement

- 2.8.1 The application submission follows discussions with Pembrokeshire County Council Officers, initiated in October 2024 whereby the draft proposals were submitted to the LPA for comment. A meeting was held with planning officers on 11 February 2025. The feedback from the LPA included the following points:
- The principal policy issues to be addressed in a subsequent planning application are whether the site represents a sustainable location, the likely visual and landscape effect of the development (including on Pembrokeshire Coast National Park), and the potential impact on existing centres / retail provision.
 - Evidence should be provided as to why it is essential that the proposal occupies the chosen site, that the location is necessary for the development and that the nature of the proposal is appropriate within a rural area.
 - Sufficient evidence should be provided to establish that the proposal would not undermine the retail hierarchy, to include a Retail Impact Assessment (addressing impact on nearby centres), sequential approach to site selection and evidence of need.



- Active travel should be prioritised and improvements to pedestrian routing to the site should be made. Technical requirements for junction design, transport assessment content and S278 works provided.
- A list of validation requirements, along with additional requested supporting information.

2.9 Public Exhibition Events

- 2.9.1 A wide-ranging community consultation has been undertaken, which consisted of a leaflet drop, with a feedback form and freepost envelope, being delivered to 8,605 local properties; an information website, with online feedback form; and a well-attended public exhibition, held locally on 4 December 2024 at De Valence Pavillion in Tenby. A follow-up community event was held on Thursday 19 December 2024 at New Hedges Village Hall, close to the site. This follow-up event was also well-attended and was publicised through an additional postcard issued to 2,060 properties.
- 2.9.2 Consultees were invited to complete a feedback form using a freepost envelope. Currently, 1,365 responses have been received to date with 89% of respondents expressing support for the proposals.
- 2.9.3 In respect of matters raised during community consultation there was overwhelming support expressed over the delivery of much needed local discount food store provision within the Tenby area. Those who commented positively saw the need for enhanced local foodstore provision and competition. A number expressed the benefits of significantly reduced travel time and costs. Concerns expressed included matters relating to highways safety, in particular vehicle speeds, and nearby residential amenity concerns.
- 2.9.4 Further details are set out in the Pre Application Consultation (PAC) Report accompanying the application.

2.10 Statutory Planning Application Consultation

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



SECTION 3

Planning Policy Context



3.0 Planning Policy Context

3.1 The Development Plan

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

3.1.2 The Development Plan for this site comprises:

- The Pembrokeshire Local Development Plan (adopted February 2013)
- Future Wales – The National Plan 2040 (published February 2021)

3.2 Future Wales: The National Plan (Feb 2021)

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

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

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

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

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

3.3 Pembrokeshire Local Development Plan (LDP)

3.3.1 The adopted Pembrokeshire County Council LDP (February 2013) forms part of the statutory development plan alongside Future Wales - The National Plan 2040.

3.3.2 The LDP Proposals Map shows that the application site is not allocated for a specific use within the LDP and therefore constitutes 'white land'. In retail policy terms, the application site is not

located within a designated retail centre and occupies an 'out-of-centre' location. An extract from the LDP Map is provided Figure 3.1.

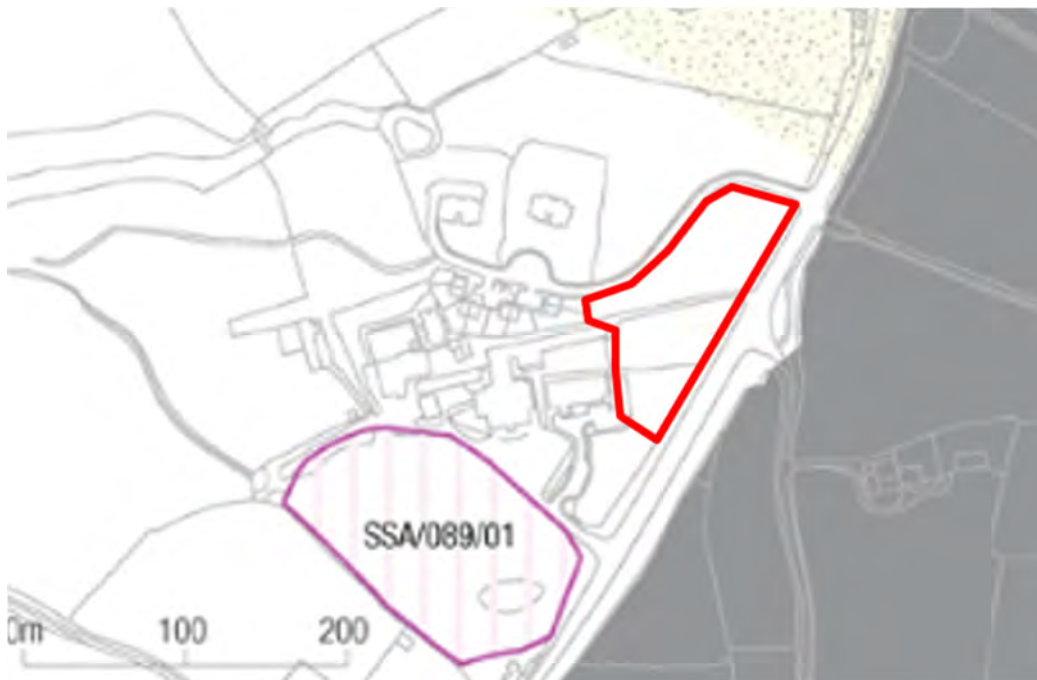


Figure 3.1: Extract of Pembrokeshire LDP Proposals Map (approximate Site boundary outlined in red)

3.3.3 The LDP policies of most relevance to the proposed development are discussed in turn below.

LDP Policy SP 1 Sustainable Development requires all development to “demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised”

LDP Policy SP 4 Promoting Retail Development states all new retail and leisure development should be consistent in scale and nature with the size and character of the Centre and its role in the retail hierarchy. It details the retail hierarchy, with Haverfordwest as the Sub-Regional Town Centre, followed by Town Centres (Pembroke Dock, Pembroke, Milford Haven, Fishguard and Narberth) and then Local Retail Centres (including Kilgetty).

LDP Policy SP 10 Transport Infrastructure and Accessibility supports improvements to the existing transport infrastructure that will increase accessibility, particularly by sustainable means.

LDP Policy SP 12 The Settlement Hierarchy identifies New Hedges as a Service Village. Tenby is identified as a Tier 1 Service and Tourism Centre in the Pembrokeshire Coast National Park's Local Development Plan 2 (PCNP LDP2) (**Policy 2 Tenby Service and Tourism Centre**).

LDP Policy SP 15 Rural Settlements states that, within the Rural Settlements, development will encourage sustainable communities and a thriving local economy. The policy promotes, as relevant to the proposal, development of a scale and nature appropriate for the settlement,



opportunities for retail, appropriate land uses which is well-related to a Settlement Boundary and greater accessibility to existing and new services.

LDP Policy SP 16 The Countryside details that “The essential requirements of people who live and work in the countryside will be met whilst protecting the landscape and natural and built environment of Pembrokeshire and adjoining areas.”

LDP Policy GN.1 General Development Policy seeks to ensure, inter alia, the location, nature, and scale of development is compatible with its surroundings and appropriate service infrastructure, access and parking can be provided. Development should not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities.

LDP Policy GN.2 Sustainable Design seeks to ensure, inter alia, development is of a good design which pays due regard to local distinctiveness and contributes positively to the local context.

LDP Policy GN.3 Infrastructure and New Development requires developments to fund new or improved infrastructure, services or community facilities where the direct need for such is generated by the proposed development. It sets criteria to be met for contributions to be sought and lists the range of purposes for which they may be sought.

LDP Policy GN.4 Resource Efficiency and Renewable and Low-carbon Energy Proposals states that proposal should minimise resource demand, improve resource efficiency and seek power generated from renewable sources, where appropriate.

LDP Policy GN.14 Major Out-of-Town Centre Development states that major out of town centre development which will only be permitted where the development would not undermine the retail hierarchy; and would not undermine the vitality and viability of any designated Town Centres or Local Retail Centres. The supporting text confirms that major retail proposals are considered to be those with a net floorspace above 500sqm.

LDP Policy GN.30 Specialist and Supported Accommodation allocates land at Park Hedges for specialist residential allocation. The allocated land lies to the south of the existing Nursing Home.

LDP Policy GN.37 Protection and Enhancement of Biodiversity states all development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity.

3.4 Other Material Considerations

Pembrokeshire Local Development Plan Review 2017-2033 Deposit 2 Plan

- 3.4.1 The Council consulted on its Second Revised Deposit LDP ('Revised LDP') and associated documents between 21 October 2024 and 16 December 2024. Until the Revised LDP is adopted, application will be determined in accordance with the adopted LDP unless material considerations indicative otherwise. The emerging Revised LDP is a material consideration in decision making.
- 3.4.2 The Second Revised Deposit LDP allocates part of the Site ('Southwest of Park House, Tenby') for 'residential / nursing facility extension' under proposed Policy GN.23.



- 3.4.3 The emerging Revised LDP policies of relevance to the proposed development are outlined in turn below.
- 3.4.4 Draft Revised **LDP Policy SP 1** Creating Sustainable Places requires all development to “support the delivery of economic, social, environmental and cultural well-being and sustainable development.”
- 3.4.5 Draft Revised **LDP Policy SP 6** Settlement Hierarchy - A sustainable Settlement Strategy identifies New Hedges as a Service Village.
- 3.4.6 Draft Revised **LDP Policy SP 11** The Countryside details that proposals in the Countryside will be supported where it is an essential requirement for people who live and work there and where it respects its landscape setting and the natural and built environment.
- 3.4.7 Draft Revised **LDP Policy SP 16** Retail Hierarchy states all new retail and commercial development should be consistent in scale and nature with the size and character of the Centre and its role in the retail hierarchy. Narberth remains as a ‘town centre’ and Kilgetty as a ‘local retail centre’.
- 3.4.8 Draft Revised **LDP Policy GN 1** General Development Policy seeks to ensure, inter alia, the location, nature, and scale of development is compatible with its surroundings and appropriate service infrastructure, access and parking can be provided. Development should not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities.
- 3.4.9 Draft Revised **LDP Policy GN 2** Sustainable Design and Placemaking seeks to ensure, inter alia, development is of a good design which pays due regard to local distinctiveness and contributes positively to the local context.
- 3.4.10 Draft Revised **LDP Policy GN 3** Infrastructure and New Development requires developments to fund new or improved infrastructure, services or community facilities where the direct need for such is generated by the proposed development. It sets criteria to be met for contributions to be sought and lists the range of purposes for which they may be sought.
- 3.4.11 Draft Revised **LDP Policy GN 23** Specialist and Supported Accommodation allocates land east of Park House for residential / nursing facility extension. The allocated land lies within the Site. Further land is allocated in GN 23 to the south of Park House for an extra care facility for older persons.
- 3.4.12 Draft Revised **LDP Policy GN 32** Out-of-Centre Retail and Commercial Development states that out-of-town centre development which will only be permitted where no sequentially preferable sites are suitable and available; a quantitative or qualitative need has been demonstrated; and the impact of the proposal would not, either by itself or in combination with permitted or allocated retail developments, undermine the vitality or viability of retail centres.



- 3.4.13 Draft Revised **LDP Policy GN 44** Protection and Enhancement of Biodiversity states all development should demonstrate a positive approach to maintaining and enhancing biodiversity and should promote the resilience of ecosystems.

Pembrokeshire Coast National Park Local Development Plan 2

- 3.4.14 Whilst the Site does not lie within the National Park Authority administrative area, the proposed foodstore is situated in close proximity to the National Park Authority administrative boundary. Indeed, the development principally seeks to meet the retail development needs of Tenby as the principal centre in the local retail hierarchy. The Authority adopted its Local Development Plan 2 (PCNP LDP2) in September 2020.

- 3.4.15 **Policy 2 Tenby Service and Tourism Centre** (Tier 1) designates Tenby as a 'Service and Tourism Centre' and lists the land use priorities, which include delivery of affordable housing and employment, and protection of facilities and shopping centre.

- 3.4.16 The Authority has undertaken a review of the LDP 2 which recommends that a full review procedure is undertaken, and a replacement plan be prepared, to be known as LDP3. A delivery agreement is due to be prepared in summer 2025, with the LDP3 to be prepared over an approximate three-and-a-half-year period, with the LDP2 remaining the adopted development plan until replaced by an adopted LDP3.

Supplementary Planning Guidance (SPG)

- 3.4.17 The Pembrokeshire LDP and National Park LDP2 are supported by a range of Supplementary Planning Documents, the following of which are of relevance to the proposed development:

- Pembrokeshire Coast National Park Landscape Character SPG (September 2020)
- Pembrokeshire Biodiversity SPG (May 2021)
- Pembrokeshire Planning Obligations SPG (September 2016)
- Pembrokeshire Parking Standards SPG (June 2013)

South West Wales Regional Retail Study (SWWRRS 2017)

- 3.4.18 The SWWRRS was prepared to help inform both plan-making and decision-taking across the three authority areas of Ceredigion County Council, Pembrokeshire County Council, and Pembrokeshire National Park Authority and assist in the development of planning policy; particularly in relation to future retail provision.

- 3.4.19 In the SWWRRS Tenby is recognised as a major tourist centre (pg. 41). Its strengths are noted as its coastal setting and its attractive, historical environment. The SWWRRS finds Tenby is the largest centre in the National Park and provides important retail and service facilities for both the local population and visitors. The in-centre convenience offer is supplemented by a Sainsbury's store just outside the centre boundary and a Co-op convenience store at Heywood Lane. Units within the historic centre are generally well occupied and there is evidence of recent investment on the periphery of the centre including at White Lion Street where Poundland and Premier Inn



have recently opened, improving the representation of national multiples in the town and improving facilities for tourists. Vacancy rates have been falling over recent years and limited vacancies, the arrival of new retailers and on-going investment suggest the retail market is strong and the centre is healthy.

- 3.4.20 Saundersfoot is noted as a healthy, attractive centre that serves local and tourist needs. The centre remains primarily a tourist centre. The lack of demand for space from the national multiples is not surprising and it would be expected that independent retailers would continue to dominate the centre. (pg.41)
- 3.4.21 As a major tourist destination, the SWWRRS considers the available information to assist in estimating the convenience 'inflow' from tourists across Pembrokeshire County, the National Park and Ceredigion. The information finds shoppers are likely to use the main food stores in the area for their shopping. In short, the SWWRRS analysis of potential expenditure within the study area by those other than the resident population has shown that the most significant additional trade will come from staying visitors to the area. This is likely to benefit the town centres across the study area and adjustments to centre turnover are made accordingly. If it is assumed that visitors would shop in a similar way to residents, the information suggests an uplift of around 19% on resident spend for all existing foodstores in Pembrokeshire (and 16.2% for those in Ceredigion). The available spend figures in SWWRRS are therefore adjusted accordingly.
- 3.4.22 In respect of need, it finds out of the National Park's four main centres, a higher quantum of forecast need is identified for Tenby, particularly for comparison goods floorspace. While forecast need is influenced by visitor expenditure the centre is popular with catchment residents for convenience and comparison shopping.
- 3.4.23 The SWWRRS finds there is potential for market shares to increase as a result of new store openings, which could in the long-term increase forecast capacity and despite finding limited quantitative capacity notes: *"there may still be market demand for new foodstore opportunities for key centres, particularly from deep discounters (e.g. Aldi and Lidl) who are planning continued expansion of their store portfolios. There may also be demand for 'local' format foodstores (e.g. Sainsbury's Local, Tesco Express, etc.) within town centre locations."* (pg.10.13)

Planning Policy Wales Edition 12 (February 2024)

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

Placemaking - PPW sets out that, to maximise well-being and the creation of sustainable places, the concept of 'placemaking' should be at the heart of the planning system. Paragraph 2.8 advises that development proposals "must seek to promote sustainable development and support the



well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act's Sustainable Development Principle". Paragraph 2.9 goes on to clarify that "The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making".

Needs Test – PPW 12 advises that when determining planning applications for retail uses, planning authorities should first consider whether there is a need for additional retail provision (para. 4.3.14). Paragraph 4.3.15 goes on to explain that need may be quantitative, to address a quantifiable unmet demand for the provision concerned, or qualitative. Precedence should be given to establishing quantitative need before qualitative need is considered for both convenience and comparison floorspace.

The Sequential Test - PPW 12 indicates Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development. It highlights that "the sequential approach applies to retail and all other uses complementary to retail and commercial centres". Paragraph 4.3.18 clarifies that by adopting a sequential approach first preference should be to locate new development within a retail and commercial centre defined in the development plan hierarchy of centres.

Retail Impact Assessment - Paragraph 4.3.26 advises that all retail planning applications or retail site allocations of 2,500 sq. m or more gross floorspace that are proposed on the edge of, or outside, designated retail and commercial centres should, once a need has been established, **be supported by a retail impact assessment.**

New Out-of-Centre Developments - Paragraph 4.3.20 states that "New out-of-centre retail developments or extensions to existing out-of-centre developments should not be of a scale, type or location likely to undermine the vibrancy, attractiveness and viability of those retail and commercial centres that would otherwise serve the community and should not be allowed if they would be likely to put development plan retail strategy at risk".

Economy & Jobs - Section 5 of PPW recognises the role that retailing plays in supporting the economy. Paragraph 5.4.1 states that "For planning purposes the Welsh Government defines economic development as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes. Paragraph 5.4.2 goes on to confirm that "Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services".

Healthy Lifestyles – Promoting healthier places forms a key Well-Being Goal set out in PPW. Paragraph 3.22 states LPA's "...should develop and maintain places that support healthy, active



lifestyles". Paragraph 3.20 highlights "Disadvantaged and deprived communities tend to be disproportionately affected by health problems".

Accessibility - PPW sets out that the planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which for example: "are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car" (Paragraph 4.1.10). Paragraph 4.1.32 continues to indicate that: "Planning authorities must ensure new housing, jobs, shopping, leisure and services are highly accessible by walking and cycling".

Green Infrastructure (GI) - PPW explains that GI plays a fundamental role in shaping places and our sense of well-being, and is intrinsic to the quality of the spaces we live, work and play in. Paragraph 6.2.4 advises that the planning system must maximise its contribution to the protection and provision of green infrastructure assets and networks as part of meeting society's wider social and economic objectives and the needs of local communities. PPW further advises that a green infrastructure statement should be submitted with all planning applications and that this will be proportionate to the scale and nature of the development proposed describing how green infrastructure has been incorporated into the proposal. In the case of minor development this will be a short description and should not be an onerous requirement for applicants. The green infrastructure statement will be an effective way of demonstrating positive multi-functional outcomes which are appropriate to the site in question.

Technical Advice Notes

3.4.26 The following Technical Advice Notes are relevant to the proposals:

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



SECTION 4

Assessment of Existing Provision



4.0 Assessment of Existing Provision

4.1 Introduction

4.1.1 This section of the assessment presents an analysis of the vitality and viability of Tenby town centre which lies in close proximity to the application site. The following analysis draws upon established sources of retail data (such as Experian GOAD reports) and our own site visits/surveys (January 2024) and observations.

4.2 The Primary Catchment Area (PCA)

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

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

4.2.2 In formulating the PCA careful regard has been paid to the shopping patterns identified in the household survey which underpins this assessment. The PCA is considered to broadly comprise of Zone 6 (Tenby) of the South West Wales Regional Retail Study (SWWRRS).

4.2.3 Inevitably some trade is likely to be drawn from outside the PCA however this is only likely to form a very small proportion of the overall turnover of the development. The extent of the PCA is shown on the plan attached at **Appendix B**.

4.3 Tenby Town Centre

4.3.1 Tenby is a popular harbour town and tourist destination. The town occupies a coastal location, on a peninsula on the south Pembrokeshire coast. The Pembrokeshire Coast National Park Local Development Plan 2 (PCNP LDP2) identifies Tenby as an important “Service and Tourism Centre” (Policy 2) and a “Town Centre” within its designated retail hierarchy (Policy 56). It is a focus for growth.

4.3.2 The SWWRRS’s health check for Tenby concludes (Appendix 12):

“Tenby is the largest centre in the National Park and provides important retail and service facilities for both the local population and visitors. The in-centre convenience offer is supplemented by a Sainsbury’s store just outside the centre boundary and the recently opened out-of-centre Co-op convenience store at Heywood Lane. Units within the historic centre are generally well occupied and there is evidence of recent investment on the periphery of the centre including at White Lion



Street where Poundland and Premier Inn have recently opened, improving the representation of national multiples in the town and improving facilities for tourists. Vacancy rates have been falling over recent years and limited vacancies, the arrival of new retailers and on-going investment suggest the retail market is strong and the centre is healthy.”

Diversity of Uses

- 4.3.3 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 C** for reference. It should be noted that the GOAD survey area directly relates to the town centre area defined by the LDP (as commonly is the case). A breakdown of units is set out in Table 4.1 below:

Table 4.1 Centre Composition

Sector	Units September 2022		Units January 2024		UK Average 2024 %
	No.	%	No.	%	
Convenience	18	9.6%	12	6.6%	9.3%
Comparison	61	32.6%	59	32.4%	26.3%
Retail Services	11	5.9%	14	7.7%	16.0%
Leisure Services	73	39.0%	60	33.0%	25.8%
Financial & Business Services	12	6.4%	14	7.7%	8.3%
Vacant	12	6.4%	23	12.6%	14.1%
Total	187	100%	182	100%	100%

Source: September 2022 and January 2024 details derived from Site Visits. UK Average 2024 – Experian GOAD data.

- 4.3.4 The convenience sector numbers 12 units, representing 6.6% of the centre. This level of provision is below the national average of 9.3%. The comparison sector numbers 59 units, representing 32.4% of the centre. This level of provision is above the national average of 26.3%. The retail service sector numbers 14 units, representing 7.7% of the centre. This level of provision is below the national average of 16.0%. The leisure services sector numbers 60 units, representing 33% of the centre. This level of provision is above the national average of 25.8%. The financial and business services sector numbers 14 units, representing 7.7% of the centre. This level of provision is below the national average of 8.3%.
- 4.3.5 Between September 2022 and January 2024, the number of units used for retail purposes has decreased by 5 due to their conversion to dwelling and non-retail use.
- 4.3.6 Tenby town centre composition is dominated by comparison and leisure services, which is somewhat typical for tourist destinations. The centre is to some degree constrained by its tight knit, densely developed character focussed along a number of linear streets. This can limit Tenby’s appeal to national multiple retailers, who for commercial reasons often seek larger floorplate, modern premises.

**Retailer Representation**

- 4.3.7 The number of national multiple retailers within a town centre can provide a good indication of its relative strength. Tenby town centre benefits from a range of both local independents and national multiples. National multiple retailers within the centre include; Greggs, Tesco Express, Seasalt Cornwall and Peacocks. This offering of national multiple retailers is complemented by a strong representation of independent retailers including; Rembrandt Jewellers, Lollies, Underground and Joy's.

Vacancies

- 4.3.8 Vacant units account for 7.7% of Tenby town centre, equivalent to 23 units. The level of vacancies are well below (around half) the national average of 14.1%, with vacant units dispersed throughout the centre. The vacancy rate is not considered to represent cause for concern. On the contrary, such a low vacancy rate is encouraging.

Accessibility

- 4.3.9 The centre is highly accessible and served by sustainable modes of public transport, including two bus stops located within the town centre; at Upper Park Road and Lower Park Road which provide access to the 349 – Withybush, 351 – Pendine & 381 - Haverfordwest services. Tenby train station is located approximately 380 metres north west of the town centre and provides frequent services to regional and national destinations, including Haverfordwest, Carmarthen, Swansea, Cardiff and Newport.
- 4.3.10 The centre is also highly accessible via private car, with the A478 providing links north to Kilgetty and the A40. The centre is served by a high level of parking provision, including surface level car parks at South Beach and South Parade and also a multi-storey car park on Upper Park Road. In summary, the centre is regarded as easily accessible to shoppers using a variety of transport modes.

Pedestrian Flows

- 4.3.11 Pedestrian flows can provide a good indicator of the strength of a centre. At the time of CarneySweeney's survey (weekday mid-day) moderate levels of activity were observed within the core of the town centre and High Street. Similar levels of footfall were also observed at St Georges Street and Upper Frog Street.
- 4.3.12 Lower levels of footfall were observed at St Julians Street and Bridge Street, potentially due to their peripheral location or less active retail frontages.
- 4.3.13 Pedestrian accessibility on the traditional town centre areas of South Parade Street and High Street is good, with no major impediments.

Environmental Quality

- 4.3.14 Generally, shopfronts and building facades are well maintained throughout the centre. Areas of public space including those adjoining the High Street and seafront are well kept, clean and tidy.



The quality of the central retail area is generally good with evidence of recent investment in the street scene and public realm. The centre is perceived as a safe and pleasant shopping environment, adding to the vitality of public areas in the town centre.

Summary

- 4.3.15 Tenby town centre is considered to be buoyant and performing well, with a strong representation of national multiple retailers and a particularly strong offering of independent retailers. Vacancies are observed to be well below the national average and the centre benefits from a healthy mix of retail and service uses. The centre is accessible by a variety of transport modes, with good levels of car parking provision. The public realm throughout the town is of a good quality, kept clean and tidy and free from litter and graffiti, adding to the overall shopping experience. In summary, Tenby centre is considered to be a vital and vibrant centre with no obvious signs of any particular weakness or vulnerability.

4.4 Saundersfoot Centre

- 4.4.1 The PCNP LDP2 identifies Saundersfoot as a “District Centre” within its designated retail hierarchy (Policy 56). The retail centre is defined on the Proposals Map.

- 4.4.2 The SWWRRS’s health check for Saundersfoot concludes (Appendix 12):

“Saundersfoot is primarily a tourist centre but also serves its local market well in a high quality environment. Shops and parking have good accessibility and are located immediately adjacent to the key attractors, namely the beach and harbour. It is currently a healthy, attractive centre which has been strengthened by the opening of Tesco Express, which complements the existing Spar. Otherwise, national multiple representation is very low. Units are generally small but are suitable for the tourist orientated trade seen in the centre and vacancies are low. Recent and on-going investment in the centre suggests it is attractive to investors and improved provision for tourists will help maintain the popularity of the centre.”

Diversity of uses

- 4.4.3 CarneySweeney has investigated the composition of the town centre based on the extent of the centre outlined in the PCNP LDP2. A plan of Saundersfoot centre is shown at **Appendix C** for reference. A breakdown of units is set out in Table 4.2 below



Table 4.2: Centre Composition

Sector	Units 2016		Units May 2025		UK Average 2024 %
	No.	%	No.	%	
Convenience	9	13.6%	6	8.5%	9.3%
Comparison	28	42.4%	20	28.2%	26.3%
Retail Services	3	4.5%	11	15.5%	16.0%
Financial & Business Services	2	3.0%	0	0%	8.3%
Leisure Services	18	27.3%	30	42.3%	25.8%
Other	2	3.0%			
Vacant	4	6.1%	4	5.6%	14.1%
Total	66	100%	71	100%	100%

Source: 2016 data from SWWRRS. May 2025 details derived from site visit. UK Average 2024 – Experian GOAD data.

- 4.4.4 The centre totals 71 units and the highest represented category is Leisure Services (42.3%), higher than the UK average of 25.8% and an increase on the percentage reported in 2016. This level of provision is not unusual for a seaside village and the change over time is representative of its evolving role within the tourism market. The centre has a mix of vibrant pubs and restaurants throughout. The comparison sector is also higher than the UK average and there is a range of different independent stores. Between 2016 and May 2025, the number of units used for retail purposes has increased by 5.

Vacancies

- 4.4.5 During the site visit in May 2025, there were four identified vacant units. The vacancy rate at 5.6% is well below the national average of 14.1%. This suggests a buoyant centre, but can also indicate a constrained centre, with little investment opportunity. A low vacancy rate tends to indicate a good demand for unit space. The centre displays no predominantly vacant areas which may otherwise give rise to concern.

Accessibility

- 4.4.6 The centre is accessible by both public and private transport. It is well located and can be accessed from B4316, leading to the A478. The centre is served by a high level of parking provision, including surface level car parks at Regency Hall, Sands (off Stammers Road) and Saundersfoot Beach (the latter being outside of, but adjacent to the town centre).
- 4.4.7 The main bus service is number 381 Haverfordwest - Tenby. The bus stop serving the route in the direction of Haverfordwest is located within the centre, with the stop for the opposite direction being within walking distance of the centre at St Bride's Hill. The nearest train station is Saundersfoot, approximately 2km away from the town centre. The train service runs between Pembroke Dock and Cardiff Central.



- 4.4.8 Most of the pavements throughout the centre are well maintained and have sufficient space for less abled users. There are no dedicated cycle lanes within the centre, however, National Cycle Network (NCN) route 4 passes north-south through the village and there were cycle stands identified during the site visit.

Pedestrian Flows

- 4.4.9 The busiest observed areas were at Stammer Road and the entrance to the beach on High Street. The centre was perceived to be busy with good levels of activity throughout the day.

Environmental Quality

- 4.4.10 The centre was found to be generally tidy and well maintained. Benches were present across the centre, creating a welcoming environment. Soft landscaping and planters were also present throughout lifting the overall quality and amenity of the public realm. There were no obvious areas prone to littering or graffiti. The streets and shop frontages were tidy and well maintained. The centre felt safe throughout the site visit, with public areas monitored by CCTV cameras. The centre has sufficient street lighting to help provide a safe environment at night. Overall, the centre's environmental quality is considered to be good.

Summary

- 4.4.11 Saundersfoot centre is considered to be buoyant and performing well. Vacancies are observed to be well below the national average and the centre benefits from a healthy mix of retail and service uses. The centre is accessible by public transport and with good levels of car parking provision. The public realm throughout the town is of a good quality, kept clean and tidy and free from litter and graffiti, adding to the overall experience. In summary, Saundersfoot centre is considered to be a vital and vibrant centre with no obvious signs of any particular weakness or vulnerability.

4.5 Narberth Town Centre

- 4.5.1 The Pembrokeshire Local Development Plan (adopted February 2013) identifies Narberth as a "Town Centre" within its designated retail hierarchy (LDP Policy SP 4 and draft revised LDP Policy SP 16). Proposals in Narberth, the smallest of the town centres are expected to reflect the niche retail nature of the existing town centre. The town centre is defined on the Pembrokeshire LDP Proposals Map.

- 4.5.2 The SWWRRS's health check for Narberth concludes (Appendix 12):

"Narberth is a healthy and attractive centre that has an established reputation for its retail and service offer. As a result it both meets the needs of its catchment population but also attracts visitors keen to see and experience its offer. It is healthy with low vacancies and a good range of shops and services that appeal to residents and visitors alike. Whilst the current permission for the Primary school site may not be implemented and there are no stated requirements from the national multiples, the lack of vacant space and popularity of the town suggest that there is likely to be demand for further retail provision in the town and the Primary school site remains a good development opportunity to increase the attractiveness of the centre."



Diversity of uses

- 4.5.3 CarneySweeney has investigated the composition of the town centre based on the extent of the centre outlined in the LDP. A plan of Narberth centre is shown at **Appendix C** for reference. A breakdown of units is set out in Table 4.3 below:

Table 4.3: Composition of Narberth centre

Sector	Units 2016		Units May 2025		UK Average 2024 %
	No.	%	No.	%	
Convenience	9	10.1%	10	10.6%	9.3%
Comparison	39	43.8%	38	40.4%	26.3%
Retail Services	6	6.7%	9	9.6%	16.0%
Financial & Business Services	13	14.6%	5	5.3%	8.3%
Leisure Services	20	22.5%	28	29.8%	25.8%
Other	0	0.0%			
Vacant	2	2.2%	4	4.7%	14.1%
Total	89	100%	94	100%	100%

Source: 2016 data from SWWRRS. May 2025 details derived from site visit. UK Average 2024 – Experian GOAD data.

- 4.5.4 The centre shows a healthy mix of restaurants, clothes stores and convenience stores. The centre totals 94 units and the highest represented category in the centre is Comparison (40.4%), which is higher than the UK average of 26.30%. Convenience and Leisure Services are also higher than the UK average. The centre has independent shops selling a whole range of items from clothes to antiques and has a strong presence of comparison sector.
- 4.5.5 Between 2016 and May 2025, the number of units used for financial and business services has more than halved.

Vacancies

- 4.5.6 During the site visit, there were four identified vacant units. The vacancy rate at 4.3% is considerably lower than the UK average of 14.1%, which indicates a centre with strong demand but may also indicate a constrained centre.

Accessibility

- 4.5.7 The centre is highly accessible and served by sustainable modes of public transport, including two bus stops located within the town centre; at Moorfield Road and Northfield Road, which provide access to the 322 – Haverford West – Carmarthen and 381 – Haverfordwest - Tenby services. Narberth train station is located approximately 1km east of the town centre and provides frequent services between Pembroke Dock and Cardiff Central.



- 4.5.8 Most of the pavements throughout the centre are well maintained and have sufficient space for less abled users. There are no dedicated cycle lanes which makes the town centre less accessible for cycle users, however cycle stands are present on Water Street by Narberth Town Hall.

Pedestrian Flows

- 4.5.9 The busiest observed areas for pedestrian activity were along the High Street, specifically by the Spar. Market Street (south of the centre) was observed to have a low footfall level, likely due to the low number of retail units in the locality.
- 4.5.10 Nevertheless, the town centre demonstrated good levels of activity, and the centre was perceived to be busy with good levels of activity throughout the day.

Environmental Quality

- 4.5.11 The centre is generally tidy and well maintained. Benches and planting were present throughout, which creates a welcoming environment and lifts the overall quality and amenity of the public realm. There were no major litter or graffiti issues observed in the town centre. For the duration of the site visit, the centre felt safe. Some retail units have CCTV cameras. The town centre appeared to be well furnished with street lighting to help provide a safe environment at night. Overall, the centre's environmental quality is high.

Summary

- 4.5.12 Narberth centre is considered to be buoyant and performing well. Vacancies are observed to be well below the national average and the centre benefits from a healthy mix of retail and service uses. The centre is accessible by public transport and with good levels of car parking provision. The public realm throughout the town is of a good quality, kept clean and tidy and free from litter and graffiti, adding to the overall experience. In summary, Narberth centre is considered to be a vital and vibrant centre with no obvious signs of any particular weakness or vulnerability.

4.6 Kilgetty

- 4.6.1 The LDP identifies Kilgetty as a 'Local Retail Centre' within its designated retail hierarchy (LDP Policy SP 4). On the associated Proposals Map, Kilgetty has no defined centre. Proposals within Local Retail Centres should maintain service provision and continue to provide facilities for the surrounding rural areas.

Diversity of Uses

- 4.6.2 CarneySweeney has investigated the composition of Kilgetty based on the extent outlined in the plan provided at **Appendix C**. The composition of units within the considered area is set out in Table 4.4 below.



Table 4.4: Composition of Kilgetty centre

Sector	Units May 2025		UK Average 2024 %
	No.	%	
Convenience	2	10.5%	9.3%
Comparison	3	15.8%	26.3%
Retail Services	5	26.3%	16.0%
Financial & Business Services	1	5.3%	8.3%
Leisure Services	8	42.1%	25.8%
Other			
Vacant	0	0	14.1%
Total	19	100%	100%

Source: May 2025 details derived from site visit. UK Average 2024 – Experian GOAD data.

- 4.6.3 Kilgetty centre shows a healthy mix of restaurants and salons. In convenience retailing terms, the centre is anchored by a Co-op food store. The centre totals 19 units and the highest represented category in the centre is leisure services (42.11%), which is much higher than the UK average of 25.79%. Convenience and Retail Services are also higher than the UK average.

Vacancies

- 4.6.4 During the site visit, there were no identified vacant units, indicative of a healthy centre that viably servicing its distinctly local top up function.

Accessibility

- 4.6.5 Access to Kilgetty is commensurate with its size and population. Kilgetty train station is located within the centre of the settlement, with direct services to Saundersfoot, Tenby and Narbeth. There are bus stops on both Carmarthen road and Ryelands Lane, which provide services to and from Tenby, Haverfordwest, Pendine, Narberth and Saundersfoot (351 and 381 services).
- 4.6.6 Kilgetty is also highly accessible via private car, with the A477 and A478 providing links north/south and east/west. There is limited off-street car parking in front of units along Carmarthen Road, with a large surface level car park at Coop.
- 4.6.7 Most of the pavements throughout the centre are well maintained. Some of the pavements in the retail centre were narrow making accessibility for less abled users difficult in places. There are no dedicated cycle lanes and cycle stands identified during the site visit and this makes the town centre less accessible for cycle users, but likely commensurate with its primarily locally servicing function.



Pedestrian Flows

- 4.6.8 In respect of pedestrian activity levels, the busiest observed area is at the Co-op store. The eastern end of the centre was observed to have a low footfall level, likely due to the takeaway units located in the vicinity being closed during the afternoon site visit hours.
- 4.6.9 Notwithstanding this, the town centre demonstrated good levels of activity, and the centre was perceived to have good levels of activity throughout the day.

Environmental Quality

- 4.6.10 The centre was generally tidy and well maintained. A bench was present outside the Co-op store and there was outdoor seating at the White Horse public house, which created a welcoming environment. There was no major litter or graffiti issues observed. Throughout the site visit, the centre felt safe. Public areas were monitored by CCTV cameras and the centre appeared to be well furnished with street lighting to help provide a safe environment at night. Overall, the centre's environmental quality is considered to be good.

Summary

- 4.6.11 Kilgetty centre is considered to be performing its locally focused function well, with no observed vacancies and a healthy mix of uses represented. The centre is accessible by public transport and with good levels of car parking provision. The public realm throughout the town is of a good quality, kept clean and tidy and free from litter and graffiti, adding to the overall experience. In summary, Kilgetty centre is considered to be a vital and vibrant locally serving centre with no obvious signs of any particular weakness or vulnerability.

4.7 New Hedges

- 4.7.1 The LDP identifies New Hedges as a 'Service Village' within its designated settlement hierarchy (Policy SP12). It is not identified within the designated retail hierarchy. On the associated Proposals Map, New Hedges has no defined centre.

Diversity of Uses

- 4.7.2 CarneySweeney has investigated the composition of New Hedges based on a review of the extent outlined on the plan provided at **Appendix C**. The composition of units within the considered area is set out in Table 4.5 below.



Table 4.5: Composition of New Hedges centre

Sector	Units May 2025		UK Average 2024 %
	No.	%	
Convenience	1	14.3%	9.3%
Comparison	0	0%	26.3%
Retail Services	1	14.3%	16.0%
Financial & Business Services	1	14.3%	8.3%
Leisure Services	3	42.9%	25.8%
Other			
Vacant	1	14.3%	14.1%
Total	7	100%	100%

Source: May 2025 details derived from site visit. UK Average 2024 – Experian GOAD data.

- 4.7.3 New Hedges is mainly served by Morrisons Daily. The village totals 7 units and the highest represented category in the centre is leisure services (42.9%), which is much higher than the UK average of 25.8%. Convenience and Financial & Businesses are also higher than the UK average.

Vacancies

- 4.7.4 During the site visit, there was one identified vacant unit. The vacancy rate at 14.3% is in line with the UK average of 14.1%.

Accessibility

- 4.7.5 Access to New Hedges is commensurate with its size and population. The nearest train station is Tenby, around 2km south. There are bus stops along the B4316 running through the settlement, which provide services to and from Tenby, Haverfordwest, Pendine, Narberth, Kilgetty and Saundersfoot (351 and 381 services).
- 4.7.6 New Hedges is also highly accessible via private car, with the A478 providing links north to Kilgetty and south towards Tenby. Services are served by commensurate levels of parking provision, including surface level car parks at Morrisons Daily, the Village Hall and Hunter's Moon Public House. In summary, New Hedges is regarded as easily accessible to shoppers using a variety of transport modes.
- 4.7.7 There were no pavements between the Morrisons Daily and to the retail units along the B4316 which doesn't accommodate and make it accessible for pedestrians visiting the village. There are no dedicated cycle lanes and cycle stands identified during the site visit and this makes the town centre less accessible for cycle users.



Pedestrian Flows

- 4.7.8 In respect of pedestrian activity levels, the busiest observed areas are at the Morrisons Daily shop. Due to the type of services provided at the north of Morrisons Daily (vehicle garage and printing service), it was expected to have a low footfall level.

Environmental Quality

- 4.7.9 The village was generally tidy and well maintained. Benches were present, which created a welcoming environment. There were no major litter or graffiti issues observed. The village felt safe during the site visit, with retail units monitored by CCTV cameras. The village appeared to be well furnished with street lighting to help provide a safe environment at night.

Summary

- 4.7.10 New Hedges is considered to be performing its locally focused function well, albeit accessibility for pedestrians and cyclists could be improved. The public realm is of a good quality, kept clean and tidy and free from litter and graffiti, adding to the overall experience.



SECTION 5

The Need for the Proposed Development



5.0 The Need for the Proposed Development

5.1 Introduction

- 5.1.1 This section of the report assesses the retail 'need' for the development, in accordance with guidance provided in PPW, TAN 4 and the adopted LDP.
- 5.1.2 The Welsh Government does not prescribe any particular methodology for undertaking need assessments, and it is up to each local planning authority to be satisfied with quantitative retail need evidence in policy making or the development management process. Local planning authorities and developers should therefore ensure assessments are prepared in a clear, logical and transparent way with the use of robust and realistic evidence. (Para 6.3, TAN4).
- 5.1.3 There are two acknowledged indicators of need: quantitative need – a statistical/numerical based assessment of need for additional floorspace; and qualitative need – an assessment of other non-numerical considerations. Qualitative considerations can include (but are not limited to) addressing issues associated with overtrading, improving accessibility, widening choice of facilities and the redistribution of trade. Weight given to qualitative need is dependent on local circumstances.
- 5.1.4 Whilst an element of precedence is apportioned to quantitative need in PPW, it states that qualitative need and other factors are material considerations when considering need, with the weight apportioned being a matter for the decision-maker in each individual case. It is within the gift of the decision maker to apportion weight to qualitative indicators of need and other material considerations.
- 5.1.5 As outlined at Section 3.0 above, the SWWRRS finds that in respect of need, a higher quantum of forecast need is identified for Tenby, particularly for comparison goods floorspace. While forecast need is influenced by visitor expenditure the centre is popular with catchment residents for convenience and comparison shopping.
- 5.1.6 The SWWRRS finds there is potential for market shares to increase as a result of new store openings, which could in the long-term increase forecast capacity and despite finding limited quantitative capacity notes: *"there may still be market demand for new foodstore opportunities for key centres, particularly from deep discounters (e.g. Aldi and Lidl) who are planning continued expansion of their store portfolios. There may also be demand for 'local' format foodstores (e.g. Sainsbury's Local, Tesco Express, etc.) within town centre locations."* (pg.10.13)

5.2 Quantitative Capacity

- 5.2.1 Table 1.4 below provides simple convenience expenditure capacity analysis within the PCA at 2030 i.e., the design year of the proposed store. The data outlined is provided in detail in **Appendix D** of this Statement.



Table 5.1: Quantitative Capacity Analysis PCA, 2030

	2025	2030
[1] Available Convenience Expenditure in PCA (£m)	40.3	39.6
[2] Turnover of existing stores in PCA (£m)	20.1	20.1
[3] Convenience turnover of proposed development (£m)	0.0	8.2
[4] Turnover of Convenience Retail Commitments in PCA (£m)	0.0	0.0
[5] Total PCA turnover (£m)	20.3	28.2
[6a] PCA convenience expenditure capacity (£m)	20.4	11.3
[6b] Retained market share of PCA expenditure (%)	49.9	71.4

Notes: Table 10 Appendix D

- 5.2.2 The above analysis (drawn from **Appendix D** of this Statement) shows there is ample unmet expenditure in the PCA to sustain additional convenience retail floorspace in 2030 (the design year of the store). The table above shows currently (2025) only £20.3m [2] of an available £40.7m [1] is being spent in PCA based stores.
- 5.2.3 The analysis clearly shows Tenby has a strikingly low market share of PCA based expenditure (49.9%), which will worsen over time as the local population grows. The current paucity of convenience goods facilities in Tenby means the majority of local (PCA) expenditure is spent or “leaked” to competing centres/stores further afield; this is a shopping pattern highlighted in the household shopping survey which underpins the impact assessment (considered in further detail in the following sections of the Statement) as well as outlined in local feedback provided during the pre-application consultation process (considered further below).
- 5.2.4 Whilst some modest proportion of ‘leakage’ can generally to be expected to higher order centres for non-food i.e., comparison retailing (as people seek greater choice and ‘comparison’), food shopping is typically carried out on a “convenience” basis where proximity is a key determinant. The significant proportion of leakage for food shopping identified in Tenby is wholly unsustainable. Table 5.1 above shows that the delivery of the proposed store in 2030 should serve to help to increase local market share in the PCA to a more healthy, sustainable 71%.
- 5.2.5 Quantitative need for additional foodstore provision in the PCA is established.

5.3 Qualitative Considerations

- 5.3.1 Qualitative need is also an important consideration. It reflects the increasing recognition of the wider economic, social and environmental considerations in determining planning applications for retail proposals. It is of particular relevance in securing accessible, efficient, competitive and innovative retail provision which, in turn will allow increased investment and stimulate job creation.
- 5.3.2 Qualitative need considerations can include (but are not limited to) addressing issues associated with existing store operational inefficiencies/ deficiencies, improving accessibility and counteracting unsustainable shopping patterns.



5.3.3 When considering ‘need’ it is crucial to note in this instance that the proposal is for a materially different retail store to that currently available in Tenby. Tenby is not currently served by a Limited Assortment Discounter (LAD) such as Lidl. The fact that Lidl is taking the multi-million-pound commercial investment decision to locate to Tenby is a very strong indication itself of

- a) the strength of the existing customer base;
- b) the importance of the store in meeting local needs; and
- c) the pressing need for improved local facilities.

Meeting local consumer need, locally

5.3.4 The household survey which underpins this assessment (considered further in section 7.0 of this Statement below) identifies the top three reasons for PCA based residents’ choice of foodstore as:

1. low prices/value for money;
2. close to home (i.e., “convenient”); and
3. the range of food goods available.

5.3.5 The household survey underpinning this assessment also highlights Lidl’s existing store at Pembroke Dock (and indeed, other stores at Pembroke Dock) is drawing significant levels of trade from Tenby (Zone 6) based residents (considered further in Section 7.0 below). This demonstrates the existing latent demand for a local discount retail format from Tenby shoppers and the prevailing unsustainable nature of shopping in Tenby currently (which is being carried out beyond Tenby).

5.3.6 The PAC report submitted with the application details the local feedback provided from the public consultation of the proposals. This makes clear the overwhelming majority of support for the proposals and the key reasons for this support; principal among them is the pressing need for a discount (main food) supermarket. Local feedback makes clear that a strong value proposition is required to serve the local area which will help people with the cost-of-living.

5.3.7 The rationale for the proposed store is clear; improved facilities are required to ably meet local need and counteract the existing unsustainable shopping patterns i.e., the significant outflow or ‘leakage’ of expenditure to surrounding settlements. The most popular destination for Tenby (Zone 6) based residents is Pembroke Dock which is manifestly better served than Tenby. Simply put, obtaining planning consent will allow Lidl to suitably serve local needs, locally. The store will help relieve pressures on existing provision which, in comparative terms, is expensive. Residents will also benefit from significant savings in fuel; a round trip to Pembroke Dock from Tenby is approximately 71km and takes 45 minutes by car. By improving local choice, Tenby will be better equipped to meet local needs and, in turn, counteract any propensity for shoppers to shop further afield; local highways will benefit from the shortened journey times – this is considered further in



the Anticipated Mileage Change Technical Note and Transport Assessment carried out by Corun which also accompany the application.

- 5.3.8 It is important to note the smaller format Limited Assortment Discounters (LAD) such as Lidl operate from far smaller stores than is typical of the large format 'big four' operators. The store is modestly scaled by supermarket standards yet well equipped to meet main-food shopping needs. It is the latest generation of Lidl store, providing ancillary staff/welfare facilities, and customer toilets etc. The store layout is sufficiently spacious and well equipped to cater for its shoppers and will prove to be a popular, convenient local main-food shopping destination for local residents.

5.4 Summary

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



SECTION 6

The Sequential Approach to site selection



6.0 The Sequential Approach to site selection

6.1 Introduction

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

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

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

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

6.2 Status of the Application Site

6.2.1 The Site is situated circa 1.6km from the Tenby Town Centre boundary and is therefore an out of centre location in retail policy terms. It is not designated for any specific use (i.e. it is 'white land').

6.3 Application of the Sequential Approach

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

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

- When looking at the suitability of potential sequential sites, flexibility should be demonstrated on issues such as format and scale. The definition of suitability is pertinent to the consideration of flexibility of format and scale. The definition was clarified in February 2012 by the Supreme Court in *Tesco Stores v Dundee City Council*¹. Since this time the Judgment has been recognised and applied by the High Court, Secretary of State and Inspectors in England and Wales. The Dundee Judgment identifies that provided the applicant has demonstrated

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



flexibility with regard to format and scale, the question is “*whether an alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit an alternative site.*” (Dundee, paragraph 29).

- For a sequentially preferable site to be suitable, it must be “suitable for the development proposed by the applicant.” The “whole exercise is directed to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for it which is for something less than that sought by the developer.” (Dundee², paras 24 and 38);
- “to refuse an out-of-centre planning consent on the ground that an admittedly smaller site is available within the town centre may be to take an entirely inappropriate business decision on behalf of the developer.” (Dundee, para 28). Accordingly, the application of the sequential test is “for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so.” (Dundee, para 38);
- Another English appeal decision is relevant - that of a mixed-use scheme informally referred to as Rushden Lakes³, 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.
- 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.
- The Aldergate Properties v Mansfield DC High Court Judgment⁴ found that in applying the sequential test the identity of an applicant is not “generally” relevant but that “there are instances where identity may matter”. In this regard it is reasonable to take the position that the ‘broad type of development’ may comprise a LAD operator, rather than any foodstore or convenience store so that it is reasonable to apply the sequential test on the basis that there is only limited scope for LAD retailers to be flexible in format.
- Furthermore, the appellant’s own commercial objectives are relevant to the question of suitability, even where these are site specific (Telford Forge⁵ appeal, para 16).
- 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.

² Ibid

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

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

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

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



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

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

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

6.4 Site Search Parameters

Flexibility

- 6.4.1 Delivering the LAD operational model has consequences for the design and layout of the stores. A critical component of the operational model is the size and configuration of the store which supports efficient stock handling procedures and an ability to stock standard product lines in sufficient depth to minimise servicing costs.
- 6.4.2 The restriction that this places on the ability of Lidl to be ‘flexible’ in its format is relevant to the sequential approach. This has been accepted by the Secretary of State and Inspectors in appeal decisions relating to Lidl foodstores, and by very many LPAs in their consideration of Lidl’s applications.
- 6.4.3 In relation to a proposal in the London Borough of Merton in 2006 the Inspector concluded (and the Secretary of State agreed) that there ‘are inherent characteristics of the Lidl business model that limit the scope for flexibility’. Those characteristics were cited as:
- a store of a size that may accommodate all functions that form the business model;
 - the need for a high proportion of sales space relative to storage space; and
 - a need to enable efficient movement of palletted goods.
- 6.4.4 Subsequent decisions have reinforced these principles including, in Nov 2013 in relation to an appeal in Huntingdon, England. The Inspector noted that “the proposed foodstore and associated



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

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

- a minimum site size of circa 0.5ha;
- a minimum net floorspace of c.1,200sqm on a single level. There is no prospect for disaggregation in this instance;
- approximately 100 adjacent surface level parking spaces. A site that is able to offer adjacent surface level car parking, so that customers can easily transfer goods to their vehicles, as they can from the existing store. To have otherwise would severely impact the appeal and viability of the store;
- A site that can allow for the safe manoeuvring of customer vehicles and delivery vehicles on site;
- A prominent site with the ability to attract passing trade;
- A site that is 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).

6.4.6 All of the above are key operational and locational requirements.

Definition of Availability

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

6.4.8 If there is any uncertainty on a site coming forward for development, for example, there are practical/feasibility/viability issues to resolve or investment/occupier interest or funding is still to be secured, then a site cannot reasonably be considered to be available.

6.4.9 As confirmed at the Court of Appeal⁷ in May 2025 potential sequentially preferable retail sites that are committed to other operators are not "available" for the purposes of the sequential test. The Courts confirm "available" is an ordinary word and planning guidance does not use it in a technical

⁷ R (Tesco Stores Limited) v Stockport MBC and Lidl Great Britain Limited [2025] EWCA Civ 610



way. If a potential alternative site does not satisfy the availability test it is not sequentially preferable.

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

6.5 Sequential Site Search

- 6.5.1 The 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. In addition, the approach is in accordance with the feedback detailed within paragraph 6.13 of the pre-application written response (reference: PR/0257/24).
- 6.5.2 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. 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.
- 6.5.3 In accordance with the feedback received within the pre-application written response (Reference: PR/0257/24), the retail centres which have been reviewed include; Tenby, Saundersfoot, Pembroke Dock, Pembroke, Narberth, Kilgetty and New Hedges.

6.6 Tenby (Town Centre)

- 6.6.1 Tenby is defined as a Town Centre by Policy 56 of the Pembrokeshire Coast National Park Local Development Plan 2 (PCNP LDP2). A review of the LDP proposals map has revealed there are no retail allocations within or in close proximity to the defined town centre. As such, the sequential site search has focused upon the results of a centre survey undertaken by CarneySweeney, coupled with a comprehensive review of all commercial agents marketing premises which are available within, or on the edge of, the town centre. A list of vacant units is set out in Table 6.1 below.

Table 6.1: Vacant Sequentially Assessed Sites, Tenby Town Centre

Address	Size (sqm)	Description
18 High Street, Tenby, SA70 7HD	213 sqm	Vacant- Retail Unit
10 St Georges Street, SA70 7JB	99 sqm	Vacant - Retail Unit
1, South Parade, Tenby	110 sqm	Vacant - Commercial
Former Royal Mail Sorting Office, 1 Warren Street, SA70 7JP	1,255 sqm	Vacant - Commercial
Warren Street, Tenby	145 sqm	Vacant- Commercial



- 6.6.2 The vacant units listed above are all significantly too small to accommodate the proposed development, allowing for flexibility. Moreover, the units are located along traditional high street frontages within the town centre and do not benefit from dedicated or adjacent customer parking facilities, nor dedicated space for HGV servicing and access. On this basis, the vacant units identified above are considered to be unsuitable and are therefore discounted.

North Beach Car Park

- 6.6.3 This site has been the subject of sequential investigations since 2023. The site lies within Tenby centre and is currently in use as a Council car park. We understand the site is in Council ownership and public parking is required to be maintained on the site to serve centre visitors including tourists. The site is affected by a public right of way. A site redevelopment comprising a foodstore with undercroft parking alongside a new multi-storey car park (to maintain a public parking facility) has been investigated.
- 6.6.4 Several iterative schemes have been assessed to try and achieve a suitable scheme however this has proved unsuccessful. A commercially suitable format store does not allow for sufficient parking capacity for either Lidl or the Council, and a 'metropolitan' format store cannot accommodate the public right of way, or parking requirements for either party, with there being a substantial decrease in the public parking arrangement. The assessment process has found a site redevelopment, even allowing for flexibility, to be unsuitable and unviable for Lidl to deliver a suitable store format, whilst maintaining a public right of way, and delivering sufficient chargeable car parking for the Council's benefit. Accordingly, the site has been discounted.

Former Pentlepoir school site

- 6.6.5 This site lies around 7km from Tenby (i.e. the centre of the intended catchment) and has been the subject of pre-application discussion and sequential investigation. It lies out of centre and its distance from Tenby centre and absence of active travel connections (with less potential for active travel enhancements) renders it less suitable to serve the primary intended catchment. Accordingly, the site is not considered to be sequentially preferably located and has been discounted.

Land at Trefloyne Lane

- 6.6.6 This site has been subject to pre-application investigations. It lies c.1m from Tenby centre. The site is designated Green Wedge by virtue of policy GN.36. The Tenby/Penally green wedge specifically seeks to protect open land around a town and to prevent the coalescence of settlements. Within these areas there is a general presumption against inappropriate development. The site lies within flood zone C2 in an area without significant flood defence infrastructure. The site is bisected by a public right of way (PRoW) and lies adjacent to Little Hoyle and Hoyle's Mouth Caves and Woodlands SSSI. Owing to the site's planning and environmental constraints the site is not considered to be a sequentially preferable alternative and has been discounted.

6.7 Saundersfoot (Local Centre)

- 6.7.1 Saundersfoot is defined as a District Centre by Policy 56 of the PCNP LDP2 (2020). It should be noted from the outset that the primary intended catchment of the proposed development is Tenby. Accordingly, Saundersfoot local centre is not considered to be sequentially preferable in serving Tenby based residents, given the distance from Tenby town centre, which is the highest order centre in the proposed development's catchment area.
- 6.7.2 A review of the LDP Proposals map shows that there are no retail or commercial allocations within Saundersfoot or within proximity. Notwithstanding the above, we have undertaken a detailed review of the commercial premises which are actively being marketed as available within Saundersfoot; those which are shown to be vacant are listed in Table 6.2 below.

Table 6.2: Vacant Sequentially Assessed Site, Saundersfoot Local Centre

Address	Size (sqm)	Description
Pharmacy Court, The Strand, Saundersfoot	231 sqm	Unit 1 Retail Shop = 127 sqm Unit 2 Retail Shop = 57 sqm Unit 3 Retail Shop = 47 sqm
Brewery Terrace, Saundersfoot, SA69	200 sqm	Vacant, Restaurant
Unit 16, Saundersfoot Harbour, SA69 9HE	165 sqm	Vacant, Retail unit
Saundersfoot Gift & Grocery Emporium, High Street	90 sqm	Vacant, Retail Unit

- 6.7.3 The search results show that there are a limited number of available units, either for sale or to rent, within Saundersfoot. The vacant premises which are identified in the table above are physically too small to meet the floorspace requirements of the proposed new Lidl foodstore and are therefore discounted from the sequential site search.
- 6.7.4 The search was extended to review sites located within 300m of the defined local centre boundary. There are no vacant sites which could accommodate the proposed development allowing for flexibility.

6.8 Pembroke (Town Centre)

- 6.8.1 Pembroke is identified as a Town Centre within the retail hierarchy (Pembrokeshire LDP Policy 4). A review of the adopted proposals map shows that there are no retail allocations within or in close proximity to Pembroke Town Centre. Briefly, it is important to note Pembroke centre lies **outside** the primary catchment area of the proposed development and is considered inherently unsuitable in sequential terms to serve Tenby based residents.
- 6.8.2 Notwithstanding this, CarneySweeney has undertaken a detailed review of all commercial agents marketing premises which are shown to be available, for rent or for sale, within or on the edge of Pembroke. There is one commercial unit within Pembroke that is actively being marketed as available: 17 Main Street, The Crown Inn. However, the size measures c. 220sqm gross and is far too small to accommodate a new foodstore of the type and size proposed.

6.9 Pembroke Dock (Town Centre)

- 6.9.1 Pembroke Dock is categorised as a Town Centre within the adopted retail hierarchy for Pembrokeshire. Lidl is **already represented** in Pembroke Dock with its store at Pier Road. The centre is therefore considered inherently unsuitable for the proposed development. Notwithstanding this, a comprehensive review of sites which are currently being marketed as available to rent and for sale within Pembroke Dock are listed in Table 6.3 below.

Table 6.3: Vacant Sequentially Assessed Sites, Pembroke Dock Town Centre

Address	Size (sqm)	Description
30 & 32 Diamond Street	130 sqm	Vacant, Retail Unit
54a Bush Street	59 sqm	Vacant, Retail/Office
Pembroke Street, Pembroke Dock	62.3 sqm	Vacant, Commercial
Queen Street, Pembroke Dock	64 sqm	Vacant, Retail/Office
Catalina House, Pembroke Dock	760 sqm	Vacant, Office Units
The Dockyard, Pembroke Dock	52 sqm	Vacant, Commercial
Llanion Park,	885 sqm	Vacant, Office
Pier House, Pier Road, Pembroke Dock	23 sqm	Vacant, Commercial
Inspectorate Building, Richmond Road, Llanion Park	233 sqm	Office/B1 and A2 Uses

- 6.9.2 The above listed vacant units listed are far too small to accommodate the proposed development.
- 6.9.3 A review of the adopted proposals map shows that there is a retail allocation within Pembroke Dock known as 'St Govan's Centre' (Site Reference: RT/096/01). Policy GN.13 (Retail Allocations) of the local plan notes that the allocation is for a mix of comparison and convenience units, on a site area of 0.23 ha. The site allocation is located within the defined Town Centre boundary of Pembroke Dock.
- 6.9.4 As outlined above Pembroke Dock centre lies outside the primary catchment area of the proposed development. Moreover, Lidl is already represented in Pembroke Dock with its store at Pier Road; a second store in Pembroke Dock is not required, nor would it adequately serve Tenby based residents. Indeed, it would merely compound the existing outflow of trade. Accordingly, Pembroke Dock has been discounted from the sequential search.

6.10 Narberth (Town Centre)

- 6.10.1 Narberth is defined as a Town Centre within the Pembrokeshire Local Plan Retail Hierarchy. Local Plan Policy GN.13 (Retail Allocations) allocates 'The Old Primary School Site' (Reference: RT/088/01) for a mix of comparison and convenience units on a site area measuring 0.41 hectares. A review of the Council's online planning register confirms that planning permission was granted in January 2015 for the *"demolition of former school buildings and construction of a convenience foodstore and non-food retail units, bakery and cafe, residential apartments, with*



associated car parking and delivery area, plus re-alignment of existing accesses, car parking and public space” (Reference: 14/0724/PA). The original planning permission was not implemented and in December 2020, planning permission was granted at the site for the “*conversion and redevelopment for retail (Class A1 & A3 uses) residential (8 houses and 3 apartments) and a library*” (Reference: 20/0369/PA). The 2020 planning permission (20/0369/A) allowed for flexible A3 use or mix of A1 and A3 use in the Old School Building (Retail Unit 02) and an A1 use in Retail Unit 01. The quantum of retail (Use Class A1) floorspace permitted is insufficient to accommodate the proposed development comprising c. 2,200 sqm.

- 6.10.2 More recently, an application for a minor material amendment was approved in January 2023 which revised the approved plans and approved uses (Reference: 22/0623/PA). In determining the application, we note Officer’s Report states:

“...The application site forms part of a site that is allocated for retail development (for a mix of convenience and comparison goods) in the Local Development Plan (LDP) by reason of policy GN.13 (Retail Allocations). The amount of guaranteed class A1 retail floor-space in this current application would amount to approximately 36sqm (approximately 10% of the total gross area of the approved units).

The application site was vacant for a number of years with development failing to be delivered. Development viability has clearly been an issue, evidenced by the original planning permission not being implemented. Recent changes to economic conditions has impacted further on the viability of a policy GN.13 compliant development...”

- 6.10.3 The planning history associated with the site allocation confirms the site is not viable for its allocation and is being brought forward in a different manner. The site has been discounted from the sequential site.
- 6.10.4 Table 6.4 below lists two commercial units that are currently being marketed as available to rent or to purchase within Narberth Town Centre. Both of the units are too small to accommodate the proposed Lidl foodstore and have therefore been discounted from the sequential site search.

Table 6.4: Vacant Sequentially Assessed Site, Narberth Town Centre

Address	Size (sqm)	Description
4 High Street, Narberth, SA67 7AR	55 sqm	Vacant, Retail
17 High Street, Narberth, SA67 7AR	24 sqm	Retail

- 6.10.5 There are no sites located within 300m of Narberth Town Centre which are available and of a sufficient size to meet the proposed site floorspace requirements.
- 6.10.6 It must also be considered that Narberth lies far outside the primary catchment area the proposed development is intended to serve. It is not considered to be sequentially preferable in serving



Tenby based residents. Indeed, it would merely compound the existing outflow of trade. Accordingly, Narberth has been discounted from the sequential search.

6.11 Kilgetty (Local Retail Centre)

- 6.11.1 Kilgetty is defined as a Local Retail Centre within the Pembrokeshire Retail Hierarchy, however the extent of the centre is undefined. Policy GN.13 (Retail Allocations) allocates the site known as 'Kingsmoor Foodstore Allocation' (Reference: RT/050/01) for convenience retail/foodstore on a site area measuring 2.86ha. Outline Planning Permission was originally granted at the site in 2009 with reserved matters approval granted in 2012. The site is accommodated by Coop and is trading for food retail. It is unavailable for the proposed development and has been discounted.
- 6.11.2 A comprehensive review of sites which are currently being marketed as available to rent and for sale within Kilgetty has identified that there are no available or suitable sites located within the defined centre boundary or within the edge of centre.

6.12 New Hedges (Service Village)

- 6.12.1 New Hedges is characterised as a 'Service Village' within the adopted Local Plan Policy SP 12. A review of the LDP Proposals map shows that there are no retail or commercial allocations within or in close proximity to New Hedges. We have undertaken a detailed review of commercial premises which are currently being marketed as available which has shown that there are no suitable or vacant sites within or on the edge of the defined boundary of New Hedges.

Land west of Twy Cross roundabout, New Hedges

- 6.12.2 This site has been the subject of a pre-application discussions. The site lies physically separate from the settlement of New Hedges and is in agricultural use. It is understood to be predicatively categorised as Grade 3a/b agricultural land. Agricultural land of grades 1, 2 and 3a is the best and most versatile and should only be developed if there is an overriding need for the development and either previously developed land or land in lower agricultural grades is unavailable. Owing to the site's planning and environmental constraints and distance from Tenby centre, with more limited potential for active travel enhancements, the site is not considered to be a sequentially preferable alternative and has been discounted.

6.13 Penally (Service Village)

Fmr Penally Training Camp

- 6.13.1 Penally is defined as a 'Service Village' within the adopted settlement hierarchy. The former Penally Training Camp site is understood to be surplus to Ministry of Defence (MOD) and is marketed for sale.
- 6.13.2 The planning history of the site is limited and predominately relates to applications for prior approval seeking the demolition of the existing military buildings on the site between 2013-2014. The planning history shows that the Council did not approve the demolition of the existing buildings on the site which, from google earth (2025) appear to remain on site.



- 6.13.3 A news article dated 14th January 2025, in the Western Telegraph states that “the early stages of plans for a housing scheme have been submitted to the national park”. We have reviewed Pembrokeshire County Council's and the National Park's online planning register, and we have not found evidence of residential proposals on the Penally Training Camp.
- 6.13.4 The site is not subject to any designations or policy constraints in accordance with the Council's adopted and emerging policy map. The site was not put forward as a ‘candidate site’ as part of the Council's call for sites exercise in respect of the emerging local plan.
- 6.13.5 We have undertaken a search of commercial agencies and websites to establish whether the Former Penally Training Camp is currently being marketed as available, however, we have found no evidence to suggest that this is the case. However, if the site were available, it would be unsuitable for a new Lidl Foodstore. The area of the entire site is circa 55, 436 sqm (5.5 ha) which is significantly too large for a retail foodstore and is therefore discounted from the sequential site search.
- 6.13.6 We note that Avison Young are marketing the neighbouring site ‘Penally Riffle Range & Adjacent Land’ to purchase freehold, as a single lot only. The site is a total of 62.12 ha (621, 200 sqm) which is significantly too large and an overall inappropriate site for a Lidl Foodstore.

6.14 Conclusion

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



SECTION 7

Assessment of Impact



7.0 Assessment of Impact

7.1 Introduction

- 7.1.1 This section of the report considers the trading effects of the proposed development, with particular regard to nearby centres.
- 7.1.2 PPW paragraph 4.3.26 advises that for development of 2,500sqm gross or more an impact assessment should accompany planning applications for main town centre uses that are not in a centre. Pembrokeshire's Local Development Plan seeks provision of a retail impact assessment for all major proposals (net floorspace of 500sqm or more), in accordance with Policy GN.14. At c.1,960sqm gross the store is **under the PPW 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. A trade diversion assessment has been carried out based on the latest population, expenditure, benchmark sales density and turnover information to help understand existing shopping patterns and market share. The assessment is underpinned by a commissioned household survey, carried out independently by NEMS market research.

7.2 Methodology and evidence base

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

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

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

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

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

Step 3 - Assess turnover and trade draw.

- 7.2.4 The use of available household telephone survey information to identify existing shopping patterns and catchment area derived turnover levels of existing facilities is a widely adopted and industry accepted approach to understanding the turnover of existing facilities. In addition, the use of published evidence of sales densities derived from company accounts also provides an industry accepted approach upon which to gauge the turnover of a proposed development.



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

Step 4 - Assess impact on existing centres.

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

Step 5 – Consider consequences of impact.

- 7.2.8 Any conclusions should be proportionate. It is important that the impacts are considered on the vitality and viability of the whole of a centre, not simply on individual facilities which may be similar to the proposed development.
- 7.2.9 The assessment utilises population projections obtained from Experian and expenditure per capita estimates and growth rates obtained from Experian, accounting for special forms of trading (SFT) i.e., non-stores sales such as internet shopping. The assessment utilises a 2022 price base throughout.
- 7.2.10 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 seek to go to the store that is nearest to their place of residence which can provide for their particular shopping needs; and
 - stores tend to compete on a 'like with like' basis, such that main foodstore proposals which have dedicated surface level car parking and provide a similar range of in-store customer facilities, would tend to compete directly for trade.

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

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

- 7.3.1 Key considerations when considering existing, committed or planned in centre investment are identified as including:
- The policy status of the investment (i.e., whether it is outlined in the Development Plan).
 - The progress made towards securing the investment (for example if contracts are established).



7.3.2 The extent to which an application is likely to undermine planned development or investments based on the effect on current/forecast turnovers, operator demand and investor confidence.

7.3.3 Retail allocations in the catchment area have been considered in detail as part of the sequential investigations undertaken as outlined in Section 6 above. We are not aware of any known notable existing, committed or planned in-centre retail investment proposals in the catchment area upon which the proposed development may give rise to unacceptable impact.

7.4 Impact on allocated sites outside centres

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

7.5 Cumulative effects of the development

7.5.1 There are no known, notable outstanding retail planning permissions within the primary catchment area for inclusion as part of this assessment.

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

7.6.1 The following paragraphs assess the potential impact of the proposal on town centre vitality and viability with a focus on choice and in-centre trade. In particular the current health of Tenby centre is considered before conclusions are drawn on whether there is any evidence the proposal would likely give rise to a significant adverse impact on in-centre vitality and viability.

7.6.2 In considering impact on in-centre trade this section draws on the assessed turnover of the proposal, existing centre turnover and also considers growth in available expenditure. 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 provided.

7.6.3 It should also be noted at this juncture that the LAD format is a materially different format to that of the mainstream operators including e.g. Tesco, Sainsbury's, Asda and Morrisons, as outlined in the preceding sections. In this respect the proposed development will **introduce** LAD provision in Tenby and thus materially improve local consumer choice in the catchment area.

7.6.4 It is widely accepted that retail uses tend to compete with their most comparable competitive facilities. For example, in an area already served by modern LAD operators, effects of new large stores are likely to fall disproportionately on the existing competing LAD stores. Their proportionate impact on local independent retailers, for example, may be less. These accepted patterns suggest that the proposed development will compete most intensely on a 'like for like' basis with existing LAD operators (with broadly comparable retail offers), most notably those nearest to the proposed development.



Turnover

- 7.6.5 Turnover is set out in detail in at **Appendix D**. The annual total turnover (convenience and comparison) of the proposed development is assessed to be c.11.1m. The convenience turnover of the proposed development is assessed to be c.9.6m allowing for inflow (including non-resident spend).

Expenditure Growth

- 7.6.6 The tables provided in **Appendix D** apply local estimates of expenditure per person to the resident population within the PCA to forecast the available retail expenditure generated over the period to 2030.

Table 7.1: Expenditure growth within PCA, 2025-30

Year	Population	Total Convenience Expenditure	Total Comparison Expenditure
2025	17,329	40.3m	50.3
2030	17,434	39.6m	55.1
Expenditure	£m	-0.8m	4.8m
Growth 2025-30	%	-1.9%	9.6%

Notes: Derived from tables at Appendix D

- 7.6.7 Analysis of expenditure growth can help provide an indication of the potential impact of a proposal. The above table demonstrates the underlying position within the PCA is one in which available comparison expenditure is expected to grow to 2030.
- 7.6.8 The above analysis alone demonstrates there is sufficient expenditure growth to support any additional comparison turnover. However, it is important to note Lidl's non-food offer is very modest, sold on a WIGIG basis (When It's Gone Its Gone) and typically purchased on an impulse basis. The choice of goods is constantly changing within the store and no type of comparison goods predominates at any given time. Crucially, Lidl is not, in itself, a comparison goods destination and thus the proposed store's capacity to affect local comparison shopping patterns is minimal. There is very limited potential for Lidl's comparison goods range to impact upon any specific retailer/ centre as there is no consistency in the range of comparison retail goods that Lidl sells. As such, the remainder of this section focuses on the quantitative effect of the proposed convenience floorspace.

Trading Assessment

- 7.6.9 This section of the statement considers the potential impact that the proposal may have on the pattern of retail expenditure in the surrounding area. Set out at Table 12 of **Appendix D** is an assessment of how the introduction of the proposal will affect the projected retail turnovers of facilities within the surrounding area.



7.6.10 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 (2025 (the base year)) expenditure pattern within the catchment/survey area, based on an identification of turnover levels of existing stores or centre derives from monies spent by households in the catchment/survey area.
- ii. Projecting the pattern of expenditure forward to 2030 (the design year) for testing impact assuming that each location maintains its current market share of expenditure.
- iii. Taking into account any changes in shopping patterns resulting from relevant retail commitments if applicable.
- iv. Assessing the pattern of trade draw to the proposal on the basis that foodstores will compete predominantly like for like with other foodstores.
- v. Calculating the quantitative impact of the proposal, in terms of:
 - The percentage reduction in trade at each store/centre at 20230 and
 - The percentage change in retail turnover in each store/centre between 2025 to 2030.

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

7.6.12 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 11 considers the overall impact of PCA based stores/centres.

7.6.13 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 stores elsewhere.

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



for a 'main food shop' supermarket is also less likely to compete with smaller 'top-up' convenience stores and corner shops.

- 7.6.15 These accepted patterns suggest that the proposed development will compete predominantly on a 'like for like basis' with large/medium sized foodstores further afield in competing centres, which are drawing significant levels of trade from Tenby based residents (given the absence of local discount choice and competition). By their nature these are more commonly accommodated in out of centre locations.

Trading Effects

- 7.6.16 Two measures of retail impact are set out in **Appendix D**:

- The change in turnover of centres in the period 2025-30 following the development of the proposal; and
- The impact of the proposal on the calculated 2030 turnover of centres.

- 7.6.17 The key changes following the development of the proposal between 2025-30 is that there will be a diversion of trade and consequential decreases in turnover achieved at centres within the catchment within the period to 2030. However, Table 12 highlights that the proposed development is anticipated to predominantly "clawback" PCA based trade currently lost to the nearest discount traders at nearby centres, namely Pembroke Dock, which, broadly speaking, are trading strongly. Indeed, Table 7 highlights Lidl's existing store at Pembroke Dock is drawing significant levels of trade from Zone 6 Tenby-based residents; this shows the existing latent demand from Tenby shoppers for the LAD retail format and the current unsustainable shopping pattern(s).

- 7.6.18 Lidl's continued focus is on 'limited assortment 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 limited assortment discount format and/or seeks to change its customer base; there remains a keen focus on its limited range and highly competitive pricing. It should be recalled, as set out at Section 2.0 above, this materially different format is recognised in Secretary of State decisions, finding "*The Lidl offer is materially different to that provided by the mainstream food retailers*"⁸.

- 7.6.19 Table 11 at **Appendix D** demonstrate the effects of the proposed foodstore is anticipated to be predominantly felt by large and/or comparably scaled foodstores, many of which typically lie out of centre and are a) not protected in retail terms and b) well equipped to absorb the trading effect.

- 7.6.20 Having regard to the role, function, and vitality and viability of existing centres, the assessed levels of impact are not considered to be significantly adverse. In respect of impact on out of centre

⁸ APP/T5720/V0/04/1171394
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facilities, as outlined, these derive no protection from the planning system and need not be considered in further detail.

7.7 Summary

- 7.7.1 The proposed development will not result in a significant adverse impact on existing, committed or planned in-centre investment.
- 7.7.2 The proposed development will introduce local 'LAD' provision to Tenby, to the benefit of local consumers. In respect to LDP policy there is no evidence to indicate the proposal would either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of town, district, local or neighbourhood centres.



SECTION 8

Other Principal Considerations



8.0 Other Principal Considerations

8.1 Introduction

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

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

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

8.2 Principle of Development

8.2.1 PPW 12 recognises that retail and commercial centres are the focal point for shopping, leisure and tourism, local services and business/employment opportunities. This 'town centres first' approach ensures, through policy and decision making, that retail and commercial centres should be the first-choice location in assessing the most appropriate places for a wide variety of developments. Policy GN.14 of the Pembrokeshire County Council Local Development Plan (February 2013) (LDP) (and draft revised LDP Policy GN 32) confirms that major out-of-centre retail proposals will only be permitted where the development would not undermine the retail hierarchy nor the vitality and viability of designated Town and Local Retail Centres.

8.2.2 The Site lies outside the settlement boundary in open countryside, in an out-of-centre location in retail terms, albeit in proximity to the New Hedges village settlement boundary. Within the adopted LDP, New Hedges is considered a service village (LDP Policy SP 12), which should offer a good provision of services and facilities to meet the day-to-day needs of their population but



play a more limited role for the wider population. New Hedges remains a service village within the draft revised LDP (Policy SP 6).

- 8.2.3 In terms of retail development, Policy SP 4 of the LDP sets out the settlement hierarchy for the County. Whilst New Hedges is not identified within the retail hierarchy, it is identified a Service Village in the settlement hierarchy, which is identified for limited growth. New Hedges is identified as a Rural Centre within Policy 6 of the Pembrokeshire Coast National Park Local Development Plan 2 (PCNP LDP2). The Site is also in proximity to Tenby, which is identified as a Town Centre within the PCNP LDP2 (Policy 56), in an area which is to see additional residential growth in the coming years, bringing the Site closer to the built-up area of Tenby and its existing and new residents. The proposed Lidl is intended to serve the New Hedges and Tenby catchment area within which it is situated. The proposals do not seek to detract from the existing retail provision within the area but, rather, complement it by providing much needed local access to the LAD retail format at a time of an acknowledged cost of living crisis. This would reduce the need to travel further afield to Pembroke Dock for the nearest LAD retailer and thereby reduce vehicle emissions at a time when Pembrokeshire has declared a climate emergency in May 2019.
- 8.2.4 The application is supported by a need, sequential impact and impact (including health check) assessment provided in Sections 5, 6, 7, and 8 of this report. As set out in the preceding sections a quantitative and qualitative need for the development is demonstrated. Tenby is a physically constrained settlement; the sequential assessment demonstrates the site is the most sequentially preferable to accommodate the development. Impacts can be both positive and negative. Here, the proposed development will introduce a materially different 'LAD' retail format locally, to the direct benefit of local shoppers. This is a manifestly positive impact. In respect of adverse trading effects, the impact assessment finds that the effects of the proposed foodstore is anticipated to be predominantly felt by large and/or comparably scaled foodstores, many of which typically lie out of centre and are a) not protected in retail terms and b) well equipped to absorb the trading effect. There is no evidence to indicate the proposal would give rise to a significantly adverse impact on the trade, turnover, vitality and viability of centres.

8.3 Design, Appearance and Soft Landscaping

- 8.3.1 The application is supported by a Design & Access Statement (HTC Architects) and Landscape Scheme (Corcadden Associates).
- 8.3.2 Lidl acknowledges the importance placed on good design in planning policy at all levels, with this in mind the proposed store has been designed to respond appropriately to the size of the site and its surrounding context.
- 8.3.3 The single storey, development sits low on the site and in the wider landscape. It incorporates high quality design, materials and a landscaping scheme that has been demonstrated to work effectively throughout the country, whilst incorporating aspects of this specific site to ensure the development is sensitive to its surroundings including the use of local and natural materials where possible. For example, the use of locally sourced stone walling.



- 8.3.4 The proposal requires the removal of the existing trees and tree groups on site. All the trees are of low or poor quality. Additional planting, along the perimeter of the site is proposed to compensate for the loss of these trees and to deliver biodiversity enhancement. Details are set out in the submitted Arboricultural Report.
- 8.3.5 Details of the proposed landscaping are outlined on the Landscape Scheme and Green Infrastructure Statement accompanying the application. A summary is set out in the Biodiversity and Green Infrastructure section below.
- 8.3.6 In light of the careful and considered design and construction proposed at the site it is considered that the proposal accords with Policies GN.1 and GN.2 of the LDP (and draft revised LDP Policies GN 1 and GN 2).

8.4 Flood Risk and Drainage

- 8.4.1 Any planning decision at the Site must be based on a detailed understanding of flood risk and drainage requirements. The flood risks and consequences of development must be fully understood and capable of being acceptably managed over the lifetime of the development.
- 8.4.2 The applicant has commissioned a technical report by Lucion to assess the flood risk at the Site and to devise a suitable drainage strategy. The Site was found not to be at an elevated risk of flood from any source. With regards to drainage, the proposed development will introduce impermeable hardstanding area in the form of buildings and access resulting in an increase in surface water runoff, if unmitigated. To ensure the increase in surface water runoff will not increase flood risk elsewhere, flow control will be used and attenuation provided on Site to accommodate storm events up to and including the 1 in 100 year plus 40% climate change event.
- 8.4.3 All methods of surface water discharge have been assessed. Draining the Site via infiltration has been found to not be possible due to the poor results of infiltration testing. Storage structures within the surface water drainage network will be lined with permeable membranes to allow some water to infiltrate and achieve interception of the first 5 mm of rainfall events. It will not be possible to discharge directly to a watercourse due to intervening third party land.
- 8.4.4 Discharge of surface water to the nearby highway drainage system at a rate of 5.27 l/s (Qbar) has been identified as the most practical option. To achieve this, attenuation storage will be provided in the form of a cellular storage tank beneath the hardstanding area and within the sub-base of permeable paved parking areas.
- 8.4.5 It is proposed to discharge foul drainage into the public sewer, subject to confirmation from Welsh Water.
- 8.4.6 The proposed development is considered to accord with LDP Policy GN.2 (and draft revised LDP Policy GN 2) in respect of flood risk and ensuring it adequately addresses sustainable water management.



8.5 Ground Conditions

- 8.5.1 The application is supported by a Phase 1 Site Investigation and Preliminary Risk Assessment and Phase 2 Ground Investigation report prepared by Remada Geo Consultants.
- 8.5.2 The objective of the Phase 1 assessment was to present a preliminary conceptual model to identify plausible pollutant linkages as a preliminary risk assessment and to provide recommendations for subsequent investigation work. The report finds that the earliest historical mapping of 1889 indicates the site to be unoccupied grassland with two footpaths leading to Park House present on site. By 1967 the footpaths were no longer recorded with a minor road leading to Park House from the A478. Published geological maps record that the site is underlain by Bishopton Mudstone Formation, designated as a Secondary (A) Aquifer. The Coal Authority Consultants Mining Reports states that probable unrecorded shallow mining as 'none', with an unnamed coal seam outcrop recorded at the surface.
- 8.5.3 The Phase 1 report makes the following recommendations:
- Investigation of the lateral and vertical extent of made ground/fill beneath the proposed store footprint;
 - Collection of soil and groundwater samples from the areas identified above for contaminants of concern;
 - Ground gas monitoring; and
 - Ground investigation to enable preliminary foundation design.
- 8.5.4 The Phase 2 report provides details of the outcomes of detailed site investigations and makes recommendations for foundation design. It confirms that there is minimal infiltration at the site. Ground gas protection measures are found to be unnecessary, but full radon protection measures are required.
- 8.5.5 The proposed development is considered to accord with LDP Policy GN.1 (and draft revised LDP Policy GN 1) in respect of harm to health resulting from contamination.

8.6 Landscape and Visual Impact

- 8.6.1 It is acknowledged that the site is located adjacent to the Pembrokeshire Coast National Park area. Corscadden Associates has prepared a Landscape and Visual Impact Assessment (LVIA) of the proposed development which accompanies the application. It provides an assessment of the effects of the proposed development, on the landscape of the site and its context.
- 8.6.2 The LVIA finds that, whilst there would inevitably be some adverse landscape and visual effects at the outset, the effects of the proposed development and the consequential effects would be localised and, when compared with the existing Site landscape quality, limited in extent. In addition, both landscape and visual matter effects arising during the construction phase would not lead to any permanent harm as the construction phase is transitory in nature and over a short period.



- 8.6.3 Viewpoints, as agreed with the PCC and PCNP during pre-application discussions, have been assessed. Planting proposals have been designed to mitigate the key viewpoints and to provide a planting type which will suit the rural location. Further, the building has been located below existing ground level, with retaining walls used on the east and parts of the south and west sides of the Site. The building is smaller than the standard size and muted coloured cladding materials are to be used to reduce the visual impact of the building. The massed buildings of the adjacent residential home, private hospital and the housing development, which are all white or pastel coloured render with dark slate roofs, contrasts with proposed muted colours of the proposed store.
- 8.6.4 The Site has existing positive green infrastructure elements with only a diseased Ash and minimal management as negative factors and the proposals endeavour to provide positive green infrastructure elements. These include improved access for pedestrians, new native hedgerows, native blocks and trees, with a wide diversity of species including pollinators and berrying species, wildflower grass areas and provision of bat and bird boxes. The landscape will establish under management and mature.
- 8.6.5 It is considered that the proposed development would not adversely affect landscape character, quality or diversity, including the special qualities of the Pembrokeshire Coast National Park, the setting of Centres and GW38, in accordance with LDP Policy GN.1 (and draft revised LDP Policy GN1) and PCNP Policies 6 and 16. Further details can be found in the accompanying LVIA.

8.7 Biodiversity and Green Infrastructure

- 8.7.1 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 site was subjected to PEA walkover survey during which habitats were assessed in line with the UK Habitat Classification (UKHab) methods.
- 8.7.2 The report identifies that there are no designated sites within the Site but there are seven within 2km. The Site comprises Modified Grassland, Mixed Scrub, Bramble Scrub and groups of individual trees, all considered to be of low value, and which provide suitable nesting, foraging habitat and refugia for a range of species. However, the appraisal found no evidence of presence or activity of any of the relevant species within the Site, including Priority Species.
- 8.7.3 The report recommends:
- Further surveys, comprising seasonal (Spring to Autumn) nighttime bat walkover surveys and remote monitoring, an eDNA surveys of 3 ponds within 250m of the Site and an update to the botanical survey in the period between May – September.
 - Construction Ecological Management Plan (CEcMP) to be produced to avoid harm to ecological features during site clearance and construction.



- Avoid site clearance works during the nesting bird season (March to August inclusive) unless the Site is checked by a Suitably Qualified Ecologist (SQE) and active nests are confirmed to be absent no later than 48 hours before works commence.
- All construction activities will be programmed to daytime hours to reduce disturbance to sensitive nocturnal species, such as bats and roosting bird species.
- External lighting will be designed in line with BCT guidance to reduce impacts bats and a range of other wildlife associated with retained and off-site habitats.
- Excavations should be securely covered or fenced overnight, or otherwise provide a means of escape for animals that may become trapped in the form of a ramp at least 300mm wide and angled no greater than 45°. Excavations should be inspected for the presence of animals before work recommences and, in the event of trapped animals being trapped, an ecologist contacted for advice.
- Gaps of at least 13cm x 13cm will be created within boundaries to facilitate movement of hedgehogs and other small animals through the Site.
- Landscape planting to compensate for any tree/shrub loss shall include species native to the local area as well as berry and fruit-bearing species alongside pollinator species, to provide increased foraging opportunities in the local area.
- The incorporation of opportunities for roosting bats and nesting birds within the development.
- Hedgerow creation along boundaries to increase connectivity in the local area, particularly west to east connectivity.

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

8.7.5 The submitted Green Infrastructure Statement, prepared by Corscadden Associates, details how the Step Wise Approach has been implemented through the development. In summary, the proposals will:

- Increase connectivity within the Site area around the boundaries of the Site;
- Compensate for tree losses through increased tree planting of mainly native species. The increased number of trees will form a larger tree group on the open frontage section of the A478 which will enhance movement of birds and bats in the area in addition to providing potential for bird nesting and bat roosting. In time this will replace the bird and bat boxes installed early in the development implementation.
- Introduce hedgerows to all boundaries except the west boundary where a native block completes the boundary connection;
- Provide tenous vegetation link through centre of the Site to the native hedgerow and tree



lines in Park Court House estate;

- Provide grass verges and a wildflower grass area;
- Include pollinator plants and berry plants are in all the planting type, tree, hedgerows, native blocks and planting beds;
- The diversity of native and ornamental plant material will give some element of resilience for climate change;
- Provide a 5 Year maintenance/defects replacement and management plan to ensure establishment and for monitoring for progress of landscape and ecology and adjusting the plan as necessary;

8.7.6 Overall, the development can bring positive biodiversity elements to the Site area. The step system has been undertaken with the disciplines of landscape, arboriculture, building, drainage, ecology and site setting. Avoidance and mitigation are undertaken and compensation is provided on-site. Long term management is to be undertaken for successful landscape establishment and to meet biodiversity objectives.

8.7.7 The submitted Ecological Management Plan prepared by Biodiverse Consulting builds on the Green Infrastructure Statement and details biodiversity avoidance, mitigation, enhancement and compensation measures to ensure a net benefit for biodiversity and ecosystem resilience for the development. It also sets out the methodology for habitat creation, management and monitoring.

8.7.8 In accordance with LDP Policies GN.1 and GN.37 (and draft revised LDP Policies GN 1 and GN 44) the proposed development respects the protects the natural environment and adopts a positive approach to the maintenance and enhancement of biodiversity.

8.8 Transport

8.8.1 The application is supported by a Transport Assessment prepared by Corun. The assessment details the merits of the proposals in transport terms and examines the highway and transportation issues associated with accommodating the proposed development.

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

8.8.3 Following the review of the accessibility options by different modes of transport, the TA concludes that the site offers viable opportunities for travel by sustainable modes and is also well connected to the adjacent highway network allowing it to maximise the custom it attracts from existing pass-by traffic.

8.8.4 The proposed parking provision on site is in line with the PCC maximum parking requirements.

8.8.5 The proposed means of access into the application site has been tested using Junctions 9 and the results have confirmed (as identified in the TA) that it provides more than adequate levels of



service for the forecast turning movements in and out of Lidl at peak times for both the store and the local highway network.

- 8.8.6 Highways improvement works are proposed in the form of a new 3m wide shared use footway / cycleway will be developed along the southern edge of the widened Garden Meadows Park carriageway. This new route will continue east from the proposed new site access junction, up to the junction with the A478, where it will connect into, and provide an extension of the existing footway / cycleway along the western edge of the A478 carriageway.
- 8.8.7 In terms of impact off-site, the TA has concluded that the development is not anticipated to cause any significant capacity impact on the surrounding highway network. All the junctions that have been subject to capacity assessment have been found to operate well within capacity in the future scenarios that include Lidl development traffic within close proximity to the site that may be exacerbated by the proposed development.
- 8.8.8 A Travel Plan is submitted in support of the application, and this will ensure the proposed development provides opportunities for sustainable modes of transport.
- 8.8.9 Accordingly, the submitted TA demonstrates that the proposed development is fully accords with LDP Policy GN.1 (and draft revised LDP Policy GN1), PCNP LDP2 Policy 59 and the Parking Standards SPD, providing a development that is safe and effective, sustainable with access to public transport and cycle parking, and with an appropriate level of parking. Further, infrastructure works to further improve sustainable access to the proposed development are to be provided in accordance with LDP Policies SP 10, GN.1 and GN.3 (and draft revised LDP Policies GN 1 and GN 3).

8.9 Residential Amenity

- 8.9.1 Whilst the proposals are located near to residential properties (Springfield Villas to the west and the residential elements of the Nursing Home to the south/southwest), the built form is set back from these boundaries, with only secondary access doors on the southwestern elements of the building. There is no risk of overlooking.
- 8.9.2 With regard to noise, Inacoustic were commissioned to assess the impact of potential noise arising from a proposed development to understand potential noise effects and how these may be mitigated. Noise measurements have been undertaken at the site and a subsequent 3-dimensional noise modelling exercise carried out.
- 8.9.3 Noise measurements were undertaken at locations representative of the closest noise-sensitive receptors in the vicinity of the site, for both daytime and night-time periods.
- 8.9.4 The Noise Assessment concludes that identifies that noise from vehicle deliveries is unlikely to significantly increase noise levels at the closest sensitive dwellings and as such, will result in n imperceptible, negligible impact. The assessment also identifies that noise from cumulative daytime activity, including customer vehicles in the car park, is unlikely to significantly increase



noise levels at the closest sensitive dwellings and as such, will also result in an imperceptible change and negligible impact.

- 8.9.5 The report identifies that the presence of a deliveries to the store during the night-time is likely to be unacceptable. Deliveries will be limited to the daytime period only (07.00 – 23.00).
- 8.9.6 The noise assessment concludes that the potential noise impacts associated with the proposed development can be adequately controlled by appropriate engineering, design and planning controls, and that noise should therefore not be considered a material constraint to the approval of planning permission for the development as described in this report.
- 8.9.7 The proposed external lighting layout for the scheme is considered appropriate and will be positioned to avoid any significant light spill onto neighbouring properties.
- 8.9.8 As such it is considered that the proposed development would not adversely affect neighbouring amenity in accordance with LDP Policy GN.1 (and draft revised LDP Policy GN1) and PCNP LDP2 Policy 56.

8.10 Economic Benefit

- 8.10.1 In line with LDP Policies SP 15 and SP 16 (and draft revised LDP Policy SP 11) and PCNP LDP2 Policy 1, the proposed development will contribute to the local rural economy and help to meet the essential requirements of people living and working in the countryside. The construction phase will bring employment opportunities to the surrounding towns and rural settlements. Workers employed in construction and related fields spend their earnings locally, benefiting local businesses and encouraging economic circulation. At the operational phase the proposed foodstore element will provide c. 40 direct, full time equivalent (FTE) jobs from e.g. store assistants and cleaners to managers etc. These job opportunities will be accessible on foot or bicycle to the surrounding resident population. Lidl currently pay a retail industry leading wage of £12.40/hour, increasing to £13.35 hour for long service.
- 8.10.2 Local shoppers are currently at an economic disadvantage insofar as they do not have easy access to the 'limited assortment discount' retail format and offer provided by Lidl. The development will assist with increasing the local availability of affordable food which is an important consideration in the context of the cost-of-living challenges faced by local consumers in the short and medium term.

8.11 Sustainability

- 8.11.1 Lidl stores are designed to be as environmentally sound as possible. For example, store heating systems are highly efficient condensing boilers which recover waste heat from the combustion process. All heating is regulated by sensors. The canopy of the store is also designed to minimise thermal gain within the building.
- 8.11.2 A system of 180.12 kWp Photo Voltaic panels consisting of 468 PV modules are proposed on the roof of the store to generate on site renewable energy for use in the store.



- 8.11.3 The lighting in the storage and warehouse areas is controlled by movement sensors so that lights only turn on when the space is in use. The sales area uses full lighting during trading hours but cuts back to one third lighting before and after trading hours to allow for re-stocking of the store. A Building Management System and LUX sensors control the lighting. This means that lights are only on when necessary, during dark periods and ensures that lights do not remain on later than 2 hours after the store closes.
- 8.11.4 Sustainable techniques are used during the construction and operation of the development wherever practicable, in accordance with LDP Policies SP 1, GN.2 and GN.4 (and draft revised LDP Policies SP 1, GN2 and GN4).

8.12 Summary

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



SECTION 9

Summary & Conclusions



9.0 Summary & Conclusions

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

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

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

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

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



- The provision of a new limited assortment discount foodstore, providing the local community with access to affordable, healthy and fresh produce;
- Reducing vehicle shopping distances, thereby reducing vehicle emissions;
- The provision of major employment and economic benefits including construction and retail jobs;
- Increased retention of expenditure within the areas;
- Provision of a high-quality design and development that sits comfortably within the surrounding context;
- Provision of active travel measures; and
- Implementation of the Step Wise Approach to meet biodiversity objectives.



Appendices



Appendix A – Proposed Layout Plan



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LIDL BASED ON LATEST SPEC - BBS 2025 LD(13)-PL-06

Updated in line with latest Carney Sweeney
A: 13/06/2025 comments. KA
Rev: Date Description Drawn

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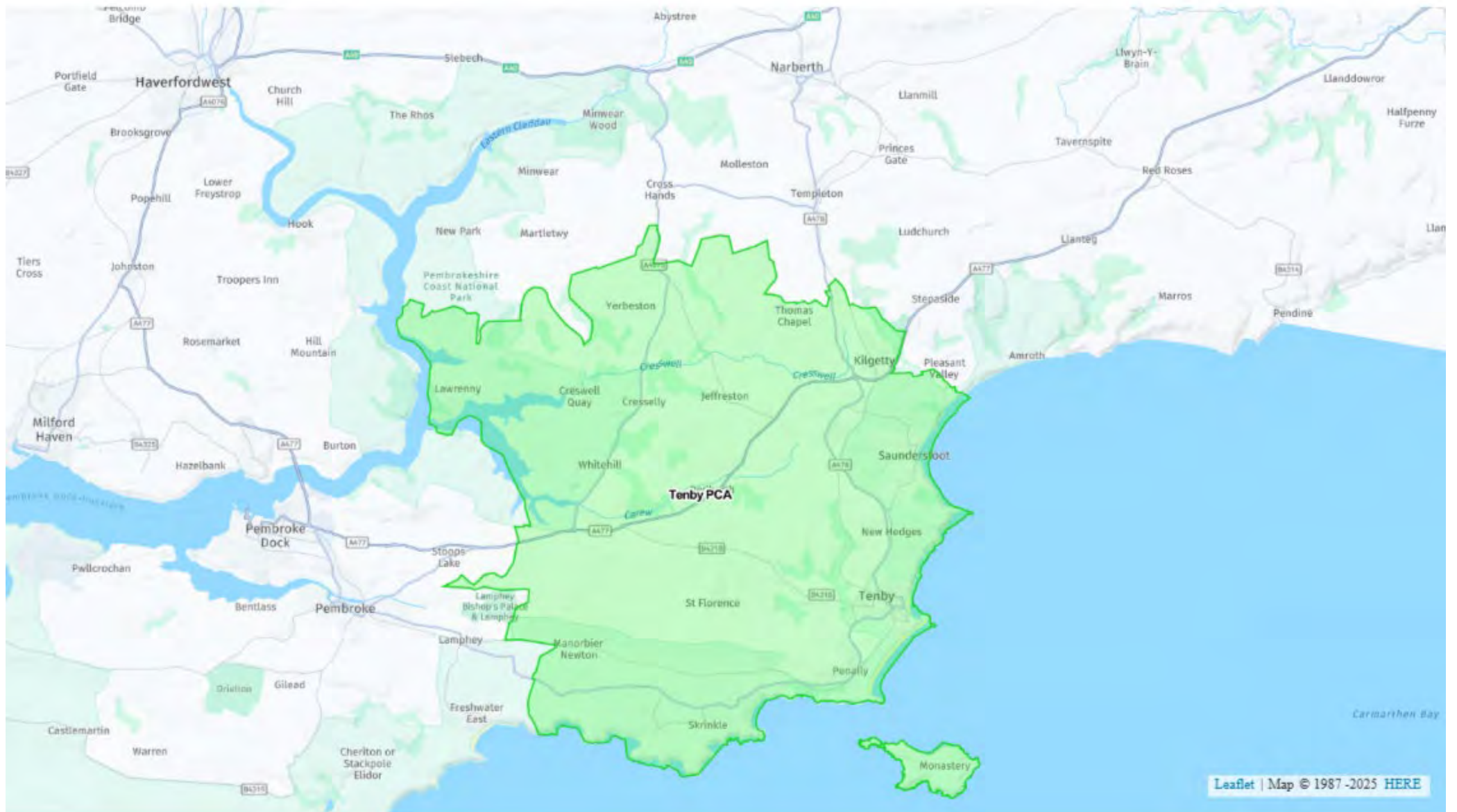
project
**Park House Court
Tenby**

drawing title
GA Proposed Site Plan

date **June 2025**
status **Planning**
scale **1:500 @ A3**
drawn **KA checked BM**
job no. **3124** dwg no. **P412** rev. **A**



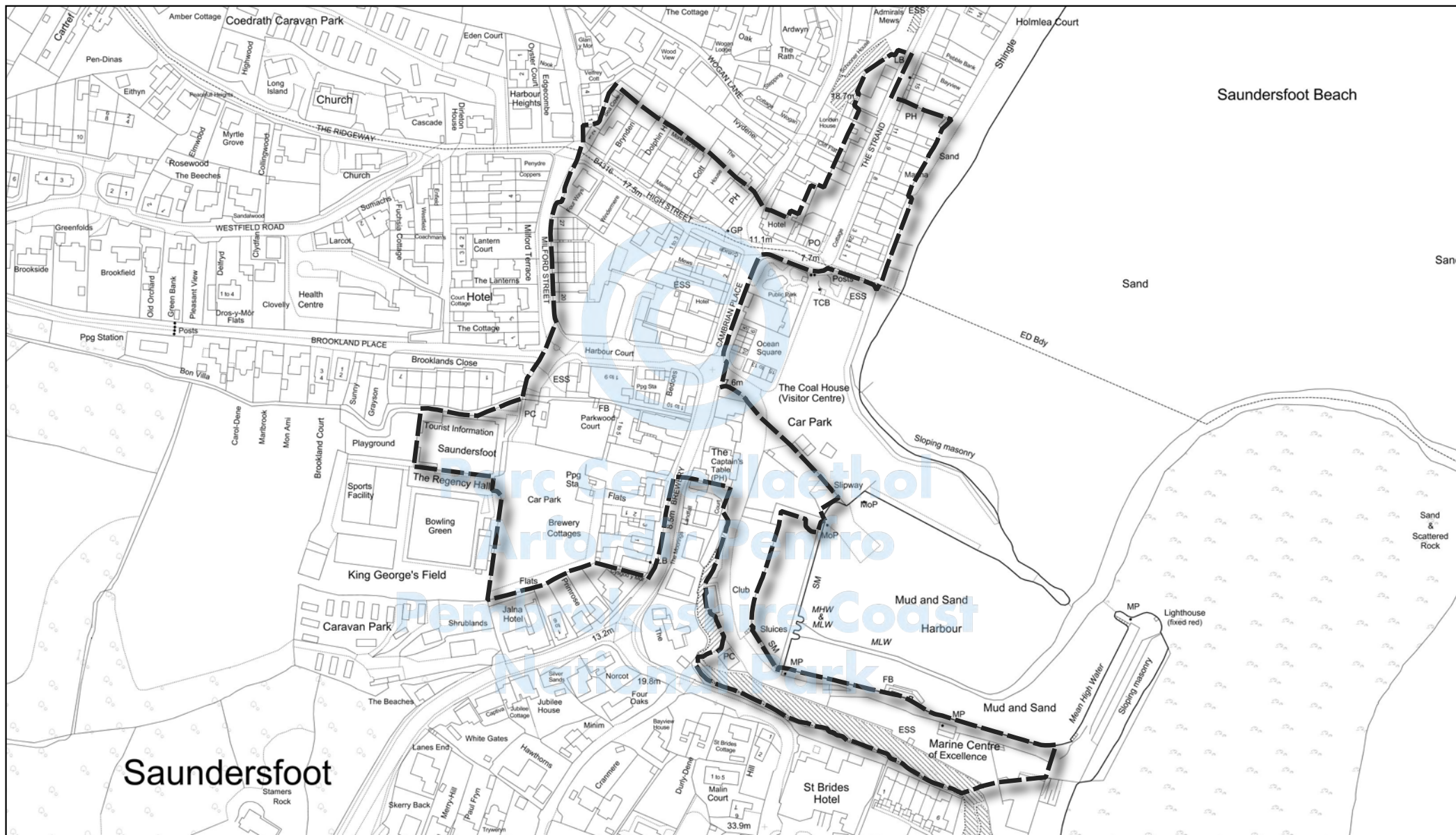
Appendix B – Primary Catchment Area Plan (PCA)





Appendix C – Centre Plans





Pembrokeshire Coast National Park Authority - Local Development Plan 2

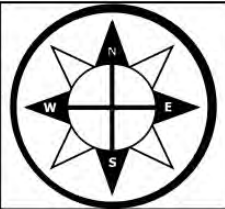
Saundersfoot Retail Centre

Graddfa / Scale: 1:3,000






Adopted LDP (28th February 2013)
Narberth Town Centre Boundary

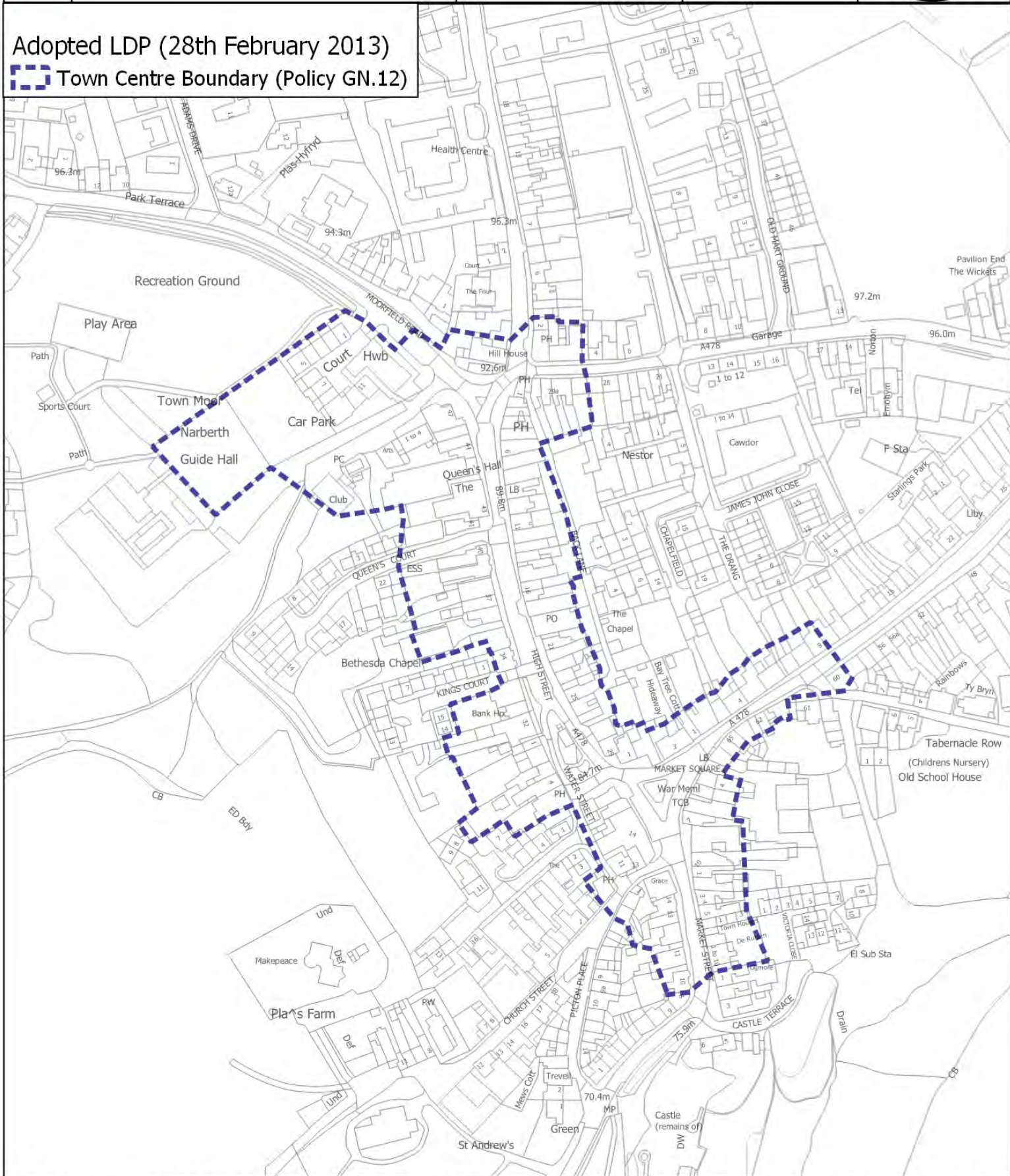


Map produced on: 12 May 2025

Scale (A4 Print)
1:2,500

Adopted LDP (28th February 2013)

 Town Centre Boundary (Policy GN.12)



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Appendix D – Statistical Tables

Lidl Great Britain Ltd
Land at Narberth Road, Tenby

Table 1: Population

Zone	2025	2026	2027	2028	2029	2030	Change 2025-2030	
							No.	%
				[2]			[3]	[4]
Zone 4 Milford Haven	20,820	20,866	20,897	20,929	20,965	21,002	182	0.9
Zone 5 Pembroke Dock	21,053	21,082	21,109	21,144	21,167	21,210	157	0.7
Zone 6 Tenby - PCA	17,329	17,336	17,364	17,377	17,408	17,434	105	0.6
Total	59,202					59,646	444	0.7

Notes:

Population projections obtained from Experian Location Analyst Report

[3] = [2] - [1]

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

Lidl Great Britain Ltd
Land at Narberth Road, Tenby

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

Zone	2025	2026	2027	2028	2029	2030
Zone 4 Milford Haven	2,161	2,146	2,133	2,125	2,116	2,108
Zone 5 Pembroke Dock	2,220	2,204	2,191	2,182	2,174	2,165
Zone 6 Tenby - PCA	2,328	2,312	2,298	2,289	2,280	2,271

Notes:

per capita figures sourced from Experian Location Analyst report data

Excludes SFT in line with Fig 5 of EXRPBN 22 (Mar 2025)

subsequent years projected forward in accordance with growth rates set out in App 3 of EXRPBN 22 (adj. for SFT (sale

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

Zone	2025	2026	2027	2028	2029	2030
Zone 4 Milford Haven	2,643	2,666	2,701	2,755	2,816	2,878
Zone 5 Pembroke Dock	2,723	2,748	2,783	2,839	2,902	2,965
Zone 6 Tenby - PCA	2,900	2,926	2,964	3,024	3,090	3,158

Notes:

per capita figures sourced from Experian Location Analyst data

Excludes SFT in line with Fig 5 of EXRPBN 22 (Mar 2025)

subsequent years projected forward in accordance with growth rates set out in App 3 of EXRPBN 22 (adj. for SFT (sale

2022 prices

Lidl Great Britain Ltd
Land at Narberth Road, Tenby

Table 4a: Total Convenience Goods Expenditure, 2025-2030 (£m)

Zone	2025	2026	2027	2028	2029	2030	Change 2025-2030	
							£m	%
					[2]		[3]	[4]
Zone 4 Milford Haven	45.0	44.8	44.6	44.5	44.4	44.3	-0.7	-1.6
Zone 5 Pembroke Dock	46.7	46.5	46.3	46.1	46.0	45.9	-0.8	-1.7
Zone 6 Tenby - PCA	40.3	40.1	39.9	39.8	39.7	39.6	-0.8	-1.9
Total	132.1	131.3	130.7	130.4	130.1	129.8	-2.3	-1.7

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	2025	2026	2027	2028	2029	2030
Zone 4 Milford Haven	37.2	37.0	36.8	36.8	36.7	36.6
Zone 5 Pembroke Dock	37.9	37.7	37.5	37.4	37.3	37.2
Zone 6 Tenby - PCA	33.7	33.4	33.3	33.2	33.1	33.0
Total	108.7	108.1	107.6	107.3	107.1	106.8

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	2025	2026	2027	2028	2029	2030
Zone 4 Milford Haven	7.8	7.8	7.7	7.7	7.7	7.7
Zone 5 Pembroke Dock	8.9	8.8	8.8	8.7	8.7	8.7
Zone 6 Tenby - PCA	6.7	6.6	6.6	6.6	6.6	6.6
Total	23.4	23.2	23.1	23.1	23.0	22.9

Notes:

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

2022 prices

Table 5a: Total Comparison Goods Expenditure, 2025-2030 (£m)

Zone	2025	2026	2027	2028	2029	2030	Change 2025-2030	
							£m	%
					[2]		[3]	[4]
Zone 4 Milford Haven	55.0	55.6	56.4	57.7	59.0	60.4	5.4	9.8
Zone 5 Pembroke Dock	57.3	57.9	58.8	60.0	61.4	62.9	5.6	9.7
Zone 6 Tenby - PCA	50.3	50.7	51.5	52.5	53.8	55.1	4.8	9.6
Total	162.6	164.3	166.7	170.2	174.2	178.4	15.8	9.7

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 2025 (£m) (Ex SFT)

	Zone 4	Zone 5	Zone 6
Clothing & Footwear	11.5	12.0	10.3
Furniture & Floor Coverings	4.6	4.9	4.5
DIY, Decorating & Gardening	4.3	4.6	4.2
Electrical	6.3	6.5	5.5
Small Household	6.9	7.3	6.6
Recording Media & Books	3.4	3.5	2.9
Chemist	5.2	5.4	4.9
Recreation	11.0	11.4	9.7
Total Comparison	53.2	55.5	48.6

2022 prices

Lidl Great Britain Ltd
Land at Harberth Road, Tenby

Table 6: Convenience shopping patterns, %

Destination	Zone 4		Zone 5		Zone 6	
	Main	TU	Main	TU	Main	TU
Zone 4						
Co-Op Food, High Street, Neyland, Milford Haven, SA73 1TF	0.60%	14.96%				
Home Bargains, Haven's Head Business Park, St Peter's Road, Milford Haven, SA73 2BP	0.30%	2.10%				
Island, Haven's Head Business Park, Milford Haven, SA73 3AU	3.55%	4.28%	0.83%			
Lidl, Great North Road, Milford Haven, SA73 2NA	8.75%	6.29%				
Local shops, Haven's Head Business Park, St Peter's Road, Milford Haven	0.15%					
Local shops, Marble Hall Road, Milford Haven		3.56%				
Local shops, Milford Haven Town Centre		1.13%				
Local shops, Neyland Town Centre		0.32%				
Morrisons Daily, High Street, Neyland, SA73 1TF		2.03%				
Nisa Local, (CK Supermarket), Charles Street, Milford Haven, SA73 2AA		7.61%				
Nisa Local, Marble Hall Road, Milford Haven, SA73 2PW		1.13%				
Nisa Local, Wellington Road, Hakin, Milford Haven, SA73 3BP		2.02%				
One Stop, Charles Street, Milford Haven, SA73 2HA	0.15%	2.34%				
Premier Stores, Hawthorn Path, Milford Haven, SA73 1BW						
Premier Stores, Marble Hall Road, Milford Haven, SA73 2PD		3.71%				
Spar, Great North Road, Milford Haven, SA73 2NA						
STAR, Honeyborough Business Park, Neyland, Milford Haven, SA73 1SE		3.08%				
Steynton Farm Shop, Thornton Road, Milford Haven, SA73 1AW						
Tesco Superstore, Haven's Head Business Park, Milford Haven, SA73 3AU	43.50%	36.54%	0.24%		1.52%	
Zone 5						
Aldi, Eastern Avenue, Pembroke Dock, SA72 4AA	6.85%	0.32%	14.24%	6.06%	22.73%	
Ascona Green Garage Service Station, The Green, Bush Hill, Pembroke, SA71 4QT				1.57%		
Asda, Gordon Street, Pembroke Dock, SA72 6DA	2.66%		23.60%	10.89%	1.60%	1.76%
B&M, London Road, Pembroke Dock, SA72 6TX						
Co-Op Food, Gosol's Lane, Pembroke, SA71 4DT			0.47%	14.79%	1.45%	0.33%
Farmfoods, Pembrokeshire Retail Park, London Road, Pembroke Dock, SA72 6DT	0.45%	0.32%	0.24%	0.52%	0.86%	
Justin's Joint, Queen Street, Pembroke Dock, SA72 6JF				0.52%		
Lidl, Pier Road, Pembroke Dock, SA72 6TR	0.75%		17.92%	12.03%	5.47%	0.33%
Local shops, Lamphay Village Centre						
Local shops, Llanreath Local Centre, Pembroke Dock						
Local shops, Pembroke Dock Town Centre	0.15%					
Local shops, Pembroke Town Centre					0.33%	
Local shops, Upper Lamphay Road, Pembroke				0.52%		
Londis, Main Street, Pembroke, SA71 4NP						
Morrisons Daily, Dimond Street, Pembroke Dock, SA72 6JA				0.52%	3.66%	
Morrisons Daily, Upper Lamphay Road, Pembroke, SA71 5Jl				4.33%	0.33%	
One Stop, Albion Square, Pembroke Dock, SA72 6DE				2.35%		
One Stop, East End Square, Pembroke, SA71 4DG				2.25%		
Premier Stores, High Street, Pennar, Pembroke Dock, SA72 6PA				3.13%		
Spar, Lamphay Service Station, A4139, Lamphay, SA71 5NW						
Spar, Long Mains, Monkton, SA71 4BA			0.47%	10.46%		
Tesco Superstore, London Road, Pembroke Dock, SA72 6DS	11.14%	0.32%	39.07%	13.65%	25.91%	0.99%
The Long Meadow Bakery, Main Street, Pembroke, SA71 4DA				2.25%		
Whistlerys, Main Street, Pembroke, SA71 4JS				0.52%	1.43%	
Zone 6						
Co-Op Food, Carmarthen Road, Kilgetty, SA68 0YA				2.21%	12.14%	
Co-Op Food, The Green, Haywood Lane, Tenby, SA70 8EU				2.75%	3.58%	
Four Seasons Farm Shop, Bethesda Cross, A478, Saundersfoot, SA69 9DS				0.52%		
Kilgetty Post Office, Carmarthen Road, Kilgetty, SA68 0UF					0.33%	
Loafley Bakery & Deli Co, Upper Frog Street, Tenby, SA70 7ID					0.33%	
Local shops, Begelly Village Centre			5.76%			
Local shops, Kilgetty Village Centre					0.33%	
Local shops, Saundersfoot Village Centre					0.33%	
Local shops, St Florence Village Centre					0.33%	
Local shops, Tenby Town Centre					0.66%	
Londis, Gable Cottage, B45E5, Manorbier, Tenby, SA70 7TJ					4.51%	
Londis, Trafalgar Road, Tenby, SA70 7DN					1.49%	
Morrisons Daily, St. Anne's Drive, New Hedges, SA70 8TN					6.41%	
Poundland, White Lion Street, Tenby, SA70 7AZ					1.43%	
Premier Stores, High Street, St Florence, SA70 8LN					7.99%	
Premier Stores, South Parade, Tenby, SA70 7DL					0.33%	
Priory Farm Shop, Knightston Lane, Tenby, SA70 8TN					0.33%	
Sainsbury's Superstore, Upper Park Road, Tenby, SA70 7LT	0.78%		0.24%	4.08%	32.41%	18.06%
Shell, A478, Cross Roads, Kilgetty, SA68 0YH						
Spar, The Strand, Saundersfoot, SA69 9ES					1.33%	
Tesco Express, Brewery Terrace, Saundersfoot, SA69 9HG				0.55%	9.16%	
Tesco Express, High Street, Tenby, SA70 7AB					20.44%	
The Cosper Hoq, Milford Street, Saundersfoot, SA69 9EP				0.14%		
The Little Pantry, High Street, Tenby, SA70 7EU				0.27%	0.33%	
Watkins Bakery, A478, Kilgetty, SA68 0YH					0.33%	
Outside Survey Area						
Aldi, Aberystwyth Road, New Town, Cardigan, SA43 1NA	2.31%	0.32%			0.27%	
Aldi, Salutation Square, Haverfordwest, SA61 2LG						
Aldi, Stephens Way, Carmarthen, SA31 2BG						
Asda Express, Heol Y Mynydd, Penrhyn, Llanelli, SA15 5TR						
Asda, Heol Y Mynydd, Gorsennon, Swansea, SA4 4BZ						
Asda, Murray Street, Llanelli, SA15 1BX						
B&M, Bridge Meadow Retail Park, Haverfordwest, SA61 2EX						
B&M, Crosshands Business Park, Cross Hands Road, Cross Hands, SA14 6SY						
B&M, Hall Street, Carmarthen, SA31 1PH						
B&M, North Park Estate, Aberystwyth Road, Ceredigion, SA43 1NA						
B&M, Trostre Retail Park, Llanelli, SA14 9UJ						
Co-Op Food, North Road, Whitland, SA34 0AE						
Costcutter, High Street, Narberth, SA67 7AR						
Costcutter, St David's Village, SA62 6NN						
Costcutter, Withybush General Hospital, Haverfordwest, SA61 2PZ						
Farmfoods, Stephens Way, Penrnam, Carmarthen, SA31 2HG						
Farmfoods, Swansea Road, Llanelli, SA15 3EQ						
Farmhouse Bakery, Station Road, Johnston, SA62 3PL		0.32%				
Home Bargains, Stephens Way, Carmarthen, SA31 2BG						
Home Bargains, Withybush Retail Estate, Fishguard Road, Haverfordwest, SA61 2PV			0.24%			
Island, Cross Hands Retail Park, Llandello Road, Cross Hands, Llanelli, SA14 6NB						
Island, Pemberton Park, Llanelli, SA14 9UJ						
Island, Pector Place, Haverfordwest, SA61 2LX		0.32%				
Island, Stephens Way, Carmarthen, SA31 2BG						
Lidl, Friars Park, Carmarthen, SA31 3FF					0.14%	
Lidl, Perrot's Road, Haverfordwest, SA61 2HD						
Local shops, Johnston Village Centre		0.32%				
Local shops, Narberth Town Centre						
Londis, A40, Llanddewi Velfrey, Narberth, SA67 7PD						
Londis, Enfield Road, Broad Haven, Haverfordwest, SA62 3JW						
Londis, Jesse Road, Narberth, SA67 7GJ						
Londis, St Thomas Green, Haverfordwest, SA61 1QX						
Marks and Spencer (M&S), Kingsland High Street, Carmarthen, SA31 1RS						
Marks and Spencer (M&S), Parc Trostre Retail Park, Trostre Road, Llanelli, SA14 9UJ						
Marks and Spencer (M&S), West Swansea Retail Park, Portardulais Road, Cadre, Forest-fa						
Marks and Spencer (M&S), Withybush Retail Park, Fishguard Road, King William Street, Haw	0.15%	2.68%	1.50%	0.52%	1.86%	
Morrisons Daily, Heol Morlais, Trimsaran, Kidwelly, SA17 4DG						
Morrisons Superstore, Bridge Meadow Lane, Haverfordwest, SA61 2EX	3.18%	1.45%	0.95%		1.01%	
Morrisons Superstore, Parc Penrnam, Carmarthen, SA31 2NF						
Morrisons Superstore, Pemberton Retail Park, Trostre Roundabout, Llanelli, SA14 9OR						
Nisa Local, (CK Supermarket), Black Lion, St Clears, SA33 4AA						
Nisa Local, (CK Supermarket), St Peters Road, Johnston, SA62 3PR						
Nisa Local, Ivy Service Station, St Clears, SA33 4JH						
Nisa Local, Spring Gardens, Narberth, SA67 7BW						
Nisa Local, Tenby Road Service Station, Llysennen Road, Carmarthen, SA33 5DT						
Premier Stores, A478, Maelfa, SA66 7NJ						
Premier Stores, Mandalen Street, Haverfordwest, SA61 1J						
Premier Stores, Market Street, Haverfordwest, SA61 1NF						
Premier Stores, Newtown Road, Hook, Haverfordwest, SA62 4NB						
Premier Stores, St John Street, Whitland, SA34 0AN						
Spar, A487, Haverfordwest, SA62 5J						
Spar, Bear Square, St Clears, SA33 4AG						
Spar, East Gate, Llanboidy, Whitland, SA34 0EJ						
Spar, Glandy Cross, Efailwen, Clynderwen, SA66 7PB						
Spar, High Street, Narberth, SA67 7AS					0.33%	
Tesco Express, The Parrog, Goodwick, SA64 0DE						
Tesco Extra, Fenton Trading Estate, Portfield, Haverfordwest, SA61 1BU	14.61%	2.52%			0.27%	0.33%
Tesco Extra, Morfa Lane, Carmarthen, SA31 3AX					1.32%	
	100%	100%	100%	100%	100%	100%

Notes

taken from NEMS household survey
Exc Nulis, SFT

Lidl Great Britain Ltd
Land at Narberth Road, Tenby

Table 7: Convenience Turnover of Existing facilities, 2025 (£m) (exc. Inflow)

Destination	Zone 4			Zone 5			Zone 6			Total £m
	Main	TU	Sub Total	Main	TU	Sub Total	Main	TU	Sub Total	
Zone 4										
Co-Op Food, High Street, Neyland, Milford Haven, SA73 1TF	0.2	1.2	1.4							1.4
Home Bargains, Haven's Head Business Park, St Peter's Road, Milford Haven, SA73 2BP	0.1	0.2	0.3							0.3
Island, Haven's Head Business Park, Milford Haven, SA73 3AU	1.3	0.3	1.7	0.3		0.3				2.0
Lidl, Great North Road, Milford Haven, SA73 2NA	3.3	0.5	3.7							3.7
Local shops, Haven's Head Business Park, St Peter's Road, Milford Haven	0.1		0.1							0.1
Local shops, Marble Hall Road, Milford Haven		0.3	0.3							0.3
Local shops, Milford Haven Town Centre		0.1	0.1							0.1
Local shops, Neyland Town Centre		0.03	0.03							0.03
Morrisons Daily, High Street, Neyland, SA73 1TF		0.2	0.2							0.2
Nisa Local, (CK Supermarket), Charles Street, Milford Haven, SA73 2AA		0.6	0.6							0.6
Nisa Local, Marble Hall Road, Milford Haven, SA73 2PW		0.1	0.1							0.1
Nisa Local, Wellington Road, Hakin, Milford Haven, SA73 3BP		0.2	0.2							0.2
One Stop, Charles Street, Milford Haven, SA73 2HA	0.1	0.2	0.2							0.2
Premier Stores, Hawthorn Path, Milford Haven, SA73 1BW										
Premier Stores, Marble Hall Road, Milford Haven, SA73 2PD		0.3	0.3							0.3
Spar, Great North Road, Milford Haven, SA73 2NA										
STAR, Honeyborough Business Park, Neyland, Milford Haven, SA73 1SE										
Steynton Farm Shop, Thornton Road, Milford Haven, SA73 1AW		0.2	0.2							0.2
Tesco Superstore, Haven's Head Business Park, Milford Haven, SA73 3AU	16.2	2.9	19.0	0.1		0.1	0.5		0.5	19.6
Zone 5										
Aldi, Eastern Avenue, Pembroke Dock, SA72 4AA	2.5	0.0	2.6	5.4	0.5	5.9	7.7		7.7	16.1
Ascona Green Garage Service Station, The Green, Bush Hill, Pembroke, SA71 4QT				0.1	0.1					0.1
Asda, Gordon Street, Pembroke Dock, SA72 6DA	1.0		1.0	8.9	1.0	9.9	0.5	0.1	0.7	11.5
B&M, London Road, Pembroke Dock, SA72 6TX				0.2	1.3	1.5	0.5	0.0	0.5	2.0
Co-Op Food, Gosse's Lane, Pembroke, SA71 4DT				0.2	0.1	0.3	1.5	0.0	0.5	2.1
Farmfoods, Pembrokeshire Retail Park, London Road, Pembroke Dock, SA72 6DT	0.2	0.03	0.2	0.1	0.05	0.1	0.3	0.3	0.3	0.6
Justin's Joint, Queen Street, Pembroke Dock, SA72 6JF					0.05	0.05				0.05
Lidl, Pier Road, Pembroke Dock, SA72 6TR	0.3		0.3	6.8	1.1	7.9	1.8	0.02	1.9	10.0
Local shops, Lamphrey Village Centre										
Local shops, Llanrhaeth Local Centre, Pembroke Dock										
Local shops, Pembroke Dock Town Centre	0.1		0.1							0.1
Local shops, Pembroke Town Centre							0.02	0.02	0.02	0.02
Local shops, Upper Lamphrey Road, Pembroke				0.05	0.05					0.05
Londis, Main Street, Pembroke, SA71 4NP										
Morrisons Daily, Dimond Street, Pembroke Dock, SA72 6JA				0.0	0.0		0.2	0.2	0.3	0.3
Morrisons Daily, Upper Lamphrey Road, Pembroke, SA71 5J				0.4	0.4		0.0	0.0		0.4
One Stop, Albion Square, Pembroke Dock, SA72 6JE				0.2	0.2					0.2
One Stop, East End Square, Pembroke, SA71 4DG				0.2	0.2					0.2
Premier Stores, High Street, Penpar, Pembroke Dock, SA72 6PA				0.3	0.3					0.3
Spar, Lamphrey Service Station, A4129, Lamphrey, SA71 5NW				0.2	0.9	1.1				1.1
Spar, Long Mains, Monkton, SA71 4NA				0.2	0.9	1.1				1.1
Tesco Superstore, London Road, Pembroke Dock, SA72 6DS	4.1	0.03	4.2	14.8	1.2	16.0	8.7	0.1	8.8	29.0
The Long Meadow Bakery, Main Street, Pembroke, SA71 4DA				0.2	0.2					0.2
Watkins Bakery, A478, Kilgetty, SA68 0YH				0.05	0.05			0.1	0.1	0.1
Zone 6										
Co-Op Food, Carmarthen Road, Kilgetty, SA68 0YA							0.7	0.8	1.6	1.6
Co-Op Food, The Green, Heywood Lane, Tenby, SA70 8EU					0.2	0.2		0.2	0.2	0.5
Four Seasons Farm Shop, Bethesda Cross, A478, Saundersfoot, SA69 9DS					0.05	0.05				0.05
Kilgetty Post Office, Carmarthen Road, Kilgetty, SA68 0UF								0.02	0.02	0.02
Loffley Bakery & Deli Co, Upper Froq Street, Tenby, SA70 7ID								0.02	0.02	0.02
Local shops, Beechly Village Centre				0.5	0.5					0.5
Local shops, Kilgetty Village Centre								0.02	0.02	0.02
Local shops, Saundersfoot Village Centre								0.02	0.02	0.02
Local shops, St Florence Village Centre								0.02	0.02	0.02
Local shops, Tenby Town Centre								0.04	0.04	0.04
Londis, Gable Cottage, B4585, Manorbier, Tenby, SA70 7TJ								0.3	0.3	0.3
Londis, Trafalgar Road, Tenby, SA70 7DN								0.1	0.1	0.1
Morrisons Daily, St Anne's Drive, New Hedges, SA70 8TN								0.4	0.4	0.4
Poundland, White Lion Street, Tenby, SA70 7AZ								0.1	0.1	0.1
Premier Stores, High Street, St Florence, SA70 8LN								0.5	0.5	0.5
Premier Stores, South Parade, Tenby, SA70 7DL								0.02	0.02	0.02
Privy Farm Shop, Knarbston Lane, Tenby, SA70 8TN								0.02	0.02	0.02
Sainsbury's Superstore, Upper Park Road, Tenby, SA70 7LT	0.3		0.3	0.1	0.4	0.5	10.9	1.2	12.1	12.9
Shell, A478, Cross Roads, Kilgetty, SA68 0YH										
Spar, The Strand, Saundersfoot, SA69 9ES								0.1	0.1	0.1
Tesco Express, Brewery Terrace, Saundersfoot, SA69 9HG							0.2	0.6	0.8	0.8
Tesco Express, High Street, Tenby, SA70 7AB							1.4	1.4	1.4	1.4
The Copper Hoq, Milford Street, Saundersfoot, SA69 9EP							0.05	0.05	0.05	0.05
The Little Pantry, High Street, Tenby, SA70 7EU							0.09	0.02	0.11	0.11
Watkins Bakery, A478, Kilgetty, SA68 0YH								0.02	0.02	0.02
Outside Survey Area										
Aldi, Aberystwyth Road, New Town, Cardigan, SA43 1NA										
Aldi, Salvation Square, Haverfordwest, SA61 2LG	0.9	0.03	0.9				0.1		0.1	1.0
Aldi, Stephens Way, Carmarthen, SA31 2BG										
Asda Express, Heol Y Meinciau, Pontyates, Llanelli, SA15 5TR										
Asda, Heol Y Mynydd, Gorsnonon, Swansea, SA4 4BZ										
Asda, Murray Street, Llanelli, SA15 1BX										
B&M, Bridge Meadow Retail Park, Haverfordwest, SA61 2EX										
B&M, Crosshands Business Park, Cross Hands Road, Cross Hands, SA14 6SY										
B&M, Hall Street, Carmarthen, SA31 1PH										
B&M, North Park Estate, Aberystwyth Road, Ceredigion, SA43 1NA										
B&M, Trostre Retail Park, Llanelli, SA14 9UY										
Co-Op Food, North Road, Whitland, SA34 0AE										
Costcutter, High Street, Narberth, SA67 7AR										
Costcutter, St Davids Village, SA62 6NN										
Costcutter, Withybush General Hospital, Haverfordwest, SA61 2PZ										
Farmfoods, Stephens Way, Penpar, Carmarthen, SA31 2NG										
Farmfoods, Swansea Road, Llanelli, SA15 3ED										
Farmhouse Bakery, Station Road, Johnston, SA62 3PL	0.03		0.03							0.03
Home Bargains, Stephens Way, Carmarthen, SA31 2BG				0.1		0.1				0.1
Home Bargains, Withybush Retail Estate, Fishguard Road, Haverfordwest, SA61 2PY										
Island, Cross Hands Retail Park, Llandeilo Road, Cross Hands, Llanelli, SA14 6NB										
Island, Pemberton Park, Llanelli, SA14 9UZ										
Island, Picton Place, Haverfordwest, SA61 2LX	0.03		0.03							0.03
Island, Stephens Way, Carmarthen, SA31 2BG										
Lidl, Friars Park, Carmarthen, SA31 3FF							0.05		0.05	0.05
Lidl, Perrot's Road, Haverfordwest, SA61 2HD										
Local shops, Johnston Village Centre	0.03		0.03							0.03
Local shops, Narberth Town Centre										
Londis, A40, Llandeilo Velfrey, Narberth, SA67 7PD										
Londis, Enfield Road, Broad Haven, Haverfordwest, SA62 3JW										
Londis, Jesse Road, Narberth, SA67 7DJ										
Londis, St Thomas Green, Haverfordwest, SA61 1QX										
Marks and Spencer (M&S), Kingsland High Street, Carmarthen, SA31 1RS										
Marks and Spencer (M&S), Parc Trostre Retail Park, Trostre Road, Llanelli, SA14 9UY										
Marks and Spencer (M&S), West Swansea Retail Park, Portardulais Road, Cadle, Forest-fach, Swansea, SA5 4BA	0.1	0.2	0.3	0.6	0.05	0.6	0.6		0.6	1.5
Marks and Spencer (M&S), Withybush Retail Park, Fishguard Road, King William Street, Haverfordwest, SA61 2PY										
Morrisons Daily, Heol Morlas, Trimsaran, Kidwelly, SA17 4DG	1.2	0.1	1.3	0.4		0.4	0.3		0.3	2.0
Morrisons Superstore, Bridge Meadow Lane, Haverfordwest, SA61 2EX										
Morrisons Superstore, Parc Penpar, Carmarthen, SA31 2NF										
Morrisons Superstore, Pemberton Retail Park, Trostre Roundabout, Llanelli, SA14 9DR										
Nisa Local, (CK Supermarket), Black Lion, St Clears, SA33 4AA										
Nisa Local, (CK Supermarket), St Peters Road, Johnston, SA62 3PR										
Nisa Local, Ivy Service Station, St Clears, SA33 4JP										
Nisa Local, Spring Gardens, Narberth, SA67 7BW										
Nisa Local, Tenby Road Service Station, Llysennen Road, Carmarthen, SA33 5DT										
Premier Stores, A478, Maelfa, SA66 7NQ										
Premier Stores, Maedalen Street, Haverfordwest, SA61 1J										
Premier Stores, Market Street, Haverfordwest, SA61 1NF										
Premier Stores, Newtown Road, Hook, Haverfordwest, SA62 4NB										
Premier Stores, St John Street, Whitland, SA34 0AN										
Spar, A487, Haverfordwest, SA62 5J										
Spar, Bear Square, St Clears, SA33 4AG										
Spar, East Gate, Llanboidy, Whitland, SA34 0EJ										
Spar, Glandy Cross, Efailwen, Clynderwen, SA66 7WB								0.02	0.02	0.02
Spar, High Street, Narberth, SA67 7AS										
Tesco Express, The Parrog, Goodwick, SA64 0DE										
Tesco Extra, Fenton Trading Estate, Portfield, Haverfordwest, SA61 1BU	5.4	0.2	5.6				0.1	0.02	0.1	5.7
Tesco Extra, Morfa Lane, Carmarthen, SA31 3AX							0.4		0.4	0.4
	37.2	7.8	45.0	37.9	8.9	46.7	33.7	6.7	40.3	132.1

Lidl Great Britain Ltd
Land at Narberth Road, Tenby

Table 8: Comparison Turnover of Existing facilities, 2025 (€m)

	C&P	P&MC	DIT	Elec	Zone 4 3m MH	Boots	Chem	Recrs	Zone 4 Sub Total	C&P	P&MC	DIT	Elec	Zone 5 3m MH	Boots	Chem	Recrs	Zone 5 Sub Total	C&P	P&MC	DIT	Elec	Zone 6 3m MH	Boots	Chem	Recrs	Zone 6 Sub Total	Total Est
Zone 4																												
Colsons Chemist, Manchester Square, Fuller Street, Milford Haven, SA73 2W								0.0	0.0																		0.0	
Crazy But True, Great North Road, Milford Haven, SA73 2NA		0.1							0.1																		0.1	
Elber Meadows Nursery, Hubberton Court, Hubberton, Milford Haven, SA73 3PU			0.0						0.0																		0.0	
Enterprise Cycles, Honeyborough Business Park, Neyland, SA73 1SE								0.4	0.4																		0.4	
Hahn Local Centre, Milford Haven								0.1	0.1								1.0										0.1	
Havens Head Shopping Centre, off Victoria Road, Milford Haven, SA73 3AU								0.8	0.8					0.1									0.1				0.9	
Home Bargains, Havens Head Business Park, St Peter's Road, Milford Haven, SA73 2BP	2.0	0.2	0.0	0.1	0.4	0.3			2.7																		3.4	
Honeyborough Garden Centre, AA47, Honeyborough, SA73 1SE			0.4	0.1	0.7	0.2	0.4	0.3	2.1														0.1				2.4	
Honeyborough Village Centre									0.0				0.3														0.3	
Isoland, Havens Head Business Park, Milford Haven, SA73 3AU								0.0	0.0																		0.0	
Lidl, Great North Road, Milford Haven, SA73 2NA								0.0	0.0																		0.0	
Milford Haven Town Centre	0.4	0.2	0.0	0.1	0.2	0.1	0.0	0.1	1.0	0.2									0.2	0.3	0.0		0.1	0.1			0.5	
Neyland Town Centre	0.1	0.1					0.0	0.5	0.4																		0.0	
Tesco Superstore, Havens Head Business Park, Milford Haven, SA73 3AU						0.9	0.6	0.6	0.8								0.3					0.0					3.8	
Thornton Industrial Estate, Thornton Road, Milford Haven, SA73 2RQ	0.4	0.1	0.0	0.2	0.9	0.6	0.6	0.8	0.1																		0.1	
Zone 5																												
A&M, Eastern Avenue, Pembroke Dock, SA72 4AA								0.1	0.1							0.0	0.1	0.2							0.2		0.2	
A&A, Gordon Street, Pembroke Dock, SA72 4DA		0.2			0.0	0.0		0.0	0.1										0.3	0.3							0.6	
B&M, London Road, Pembroke Dock, SA72 6TW		0.2	0.2	0.4	0.0	0.3		0.1	0.4					0.1	1.5			0.0	0.0			0.8	0.3	0.2	0.1	1.3	0.9	
Blarwood Cycles, London Road, Pembroke Dock, SA72 6DT									1.5			0.7	0.1	1.5				0.0	0.2								2.8	
Colection Garden Centre, A477, Collection, SA72 4SW									0.3										0.2								0.3	
Jewson, Station Road, Pembroke, SA71 4AH									0.0										0.0			0.0					0.0	
Kingswood Trading Estate, London Road, Pembroke Dock, SA72 4RS									0.2					0.2			0.4		0.2			0.0	0.1	0.1			0.3	
Lidl, Pier Road, Pembroke Dock, SA72 6TH									0.4					0.6	1.0	0.4			0.2								0.5	
Pembroke Dock Town Centre		0.2	0.2	0.0	0.1	0.1	0.1	0.1	0.7	0.3	1.6	0.5	0.8	1.0	1.3	1.3		6.7	0.1	0.2	0.2	0.1	0.1	0.2	0.2	3.1	4.3	
Peterchurch Retail Park, Pembroke Dock, SA72 6DT		0.3	0.0	0.1	0.1	0.3		0.0	0.1		0.9	0.2	0.1	0.4	0.1	1.1	2.4	2.8	0.1	0.1	1.1	0.4	0.0	0.0	1.5	3.1	12.7	
Snowells, Kingswood Trading Estate, Pembroke Dock, SA72 4RS			0.3	0.2	0.3	0.0	0.2	0.3	1.5		0.3	0.5	0.4	1.7	0.0			0.2				0.4					0.4	
Tesco Superstore, London Road, Pembroke Dock, SA72 4RS									1.2									3.0				0.4	0.0	0.5	0.2		4.8	
Wilks, Pier Road, Pembroke Dock, SA72 6TH									0.1		0.1	0.0						0.2									0.2	
Zone 6																												
Carew Village Centre																						0.3					0.3	
Evans Pharmacy, Sea Lane, Tenby, SA70 8AG																							0.2				0.2	
Jewson, The Green, Tenby, SA70 8ET																					1.0	0.1					0.1	
Kilgilly Village Centre																			0.3					0.4			0.4	
Llysteg Nurseries, The Green, Manorbier, SA70 7TQ												0.3															0.1	
Llysteg Village Centre																						0.1					0.1	
Manorbier Garden Centre, Station Road, Manorbier, SA70 7SN																						0.1					0.1	
New Hedges Village Centre																							0.5	1.2			1.9	
Sainsbury Superstore, Upper Park Road, Tenby, SA70 7LT																	0.1		0.1								2.0	
Sandhill Nurseries, Sandy Hill Road, Saundersfoot, SA69 8QR																			0.1		0.0		0.2	0.0	0.0		0.0	
Saundersfoot Village Centre																			0.1		0.2	0.0	0.0	0.0	0.3		0.7	
Tenby Town Centre																					0.7	0.7	0.2	0.3	1.4	0.9	6.4	
Tenby Town Centre	0.1		0.0		0.1				0.2	0.2	0.0					0.3	0.1	0.2	0.8	0.7	0.7	0.2	0.3	1.4	0.9	1.6	7.5	
Tesco Express, High Street, Tenby, SA70 7AB																							0.1		0.5	0.1	0.1	
Outside Survey Area																												
A&D, Aberystwyth Road, New Town, Cardigan, SA43 1NA																												
A&D, Salutation Square, Haverfordwest, SA61 2LG																												
A&D, Stephens Way, Carmarthen, SA31 2SS																												
Aldi, Heol Y Mynydd, Gorseon, Swansea, SA4 4BE																												
Aldi, Murray Street, Llanelli, SA15 1BB																												
B&M, Bridge Meadow Retail Park, Haverfordwest, SA61 2EX		0.1			0.2				0.2						0.1				0.1								0.3	
B&M, Crosshands Business Park, Cross Hands Road, Cross Hands, SA14 6DY																												
B&M, Hall Street, Carmarthen, SA31 1PW																												
B&M, North Park Estate, Aberystwyth Road, Ceredigion, SA43 1NA																												
B&M, Trozine Retail Park, Llanelli, SA14 9UY																												
B&Q, Morfa Retail and Leisure Park, Bon-y-math, Swansea, SA1 7DF																												
B&Q, Old Towy Swamies, Glangruffydd Road, Carmarthen, SA31 3AS					0.1				0.1														0.2				0.2	
B&Q, Trozine Retail Park, Parc Trozine Road, Llanelli, SA14 9US																												
Bury Town Centre																												
Bridgend Retail Park, Cowbridge Road, Bridgend, CF31 3XX		0.0							0.0																		0.0	
Bridgend Town Centre																												
British Airport, Bristol, BS48 3DY																												
Bristol City Centre																												
Bristol City Centre																												
Caerphilly Town Centre																												
Cardiff City Centre		0.4					0.1	0.1	0.6										0.9	1.2	0.1	0.1	0.0	0.0	0.0	0.6	1.9	
Carmarthen Town Centre	0.5	0.0			0.0	0.1	0.1		0.7	0.1	0.0				0.3				0.4	1.8	0.0	0.1	0.0	0.4	0.0	0.1	2.5	
Clarks Village Shopping Centre, Farm Road, Street, BA16 0BB																					0.1						0.1	
Costco, Capital Retail Park, Leckwith Road, Cardiff, CF11 8EG																												
Coxwell Outdoor, Spine Road East, Coxwold, YO7 5TS																												
Cowbridge Town Centre																												
Cribbs Causeway Retail Park, Pitchway, Bristol, BS34 5TX					0.1				0.1														0.1				0.1	
Cross Hands Village Centre																												
Deverthorpe, Cuckoo House Cross, Cardiff, CF5 6ND								0.4	0.4																		0.4	
Designer Outlet, Deverthorpe, Bridgend, CF32 9SD		0.1					0.5	0.5	0.5										0.3	0.3		0.1				0.5		
Elm, off A484, Myrtle Hill, Carmarthen, SA31 2AG						0.0			0.0													0.8					0.8	
Durham, Waterson Road, Bridgend, CF31 3XX																												
Ffynnon Retail Park, Pontardulais Road, Cardiff, Fforestfach, Swansea, SA5 4BA											0.9								0.9			0.1					1.0	
Ffiggydd Town Centre																												
Fford Retail Park, A&A, Tenby, Carmarthen, SA31 2BN		0.0							0.0														0.1		0.4		0.5	
Ffryston Cross Village Centre		0.0							0.0																			

Notes
Turnover derived from h/h survey and total available comparison expenditure
Exc Nulls, SFT

Lidl Great Britain Ltd
Land at Narberth Road, Tenby

Table 9: Retail Turnover of Proposed Development

	Gross Internal Area (sqm)	Total Net Sales (sqm)	Trading density (£/sqm)	Turnover 2025 (£m)	Turnover 2030 (£m)	Turnover 2030 inc. Inflow(£m)
	[1]	[2]	[4]	[5]	[6]	[7]
Proposed Lidl Foodstore	1,949	1,347				
convenience floorspace		1,078	7,576	8.2	8.2	9.7
comparison floorspace		269	4,318	1.2	1.3	1.6
Total					9.5	11.3

Notes

[2] Net sales area taken from application drawings

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

[4] s/d taken from GlobalData (March 2025) indexed to 2022 price base

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

[6] turnover projected to 2030 based on assumed f/s efficiency increase (0.0% conv, 2.3% comp) (EXRPBN 22 Fig 4a (Mar 2025))

[7] allowance for non resident spend (inflow)

2022 prices

Table 10 Capacity for additional convenience floorspace to 2030

	2025	2030
[1] Available Convenience Expenditure in PCA (Zone 6) (£m)	40.3	39.6
[2] Turnover of existing stores in PCA (Zone 6) (£m)	20.1	20.1
[3] Convenience turnover of proposed development (£m)	0.0	8.2
[4] Turnover of Convenience Retail Commitments in PCA (£m)	0.0	0.0
[5] Total PCA turnover (£m)	20.1	28.2
[6a] PCA convenience expenditure capacity (£m)	20.2	11.3
[6b] Retained market share of PCA expenditure (%)	49.9	71.4

Notes

[1] taken from table 4

[2] derived from table 8. Projected forward to 2030 on basis that facilities gain from a pro-rata growth in expenditure as set

[3] taken from table 9

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

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

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

2022 prices

Table 11: Convenience trading effects of the proposed development, 2030

	Turnover 2025		inflow	Total Turnover 2025	Turnover 2030		inflow	Total Turnover 2030	Trade Draw to Proposal				Residual Turnover 2030	Impact			
	Convenience	Comparison			Convenience	Comparison			Convenience		Comparison			Change 2025-30		2030 Impact	
	£m	£m			£m	£m			%	£m	%	£m		£m	£m	%	£m
	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]		[10]		[11]	[12]	[13]	[14]	[15]
Primary Catchment Area																	
Tenby Town Centre																	
Loafley Bakery & Deli Co, Upper Frog Street, Tenby, SA70 7JD	0.02		19	0.03	0.02		19	0.03					0.03				
Local shops, Tenby Town Centre	0.04		19	0.05	0.04		19	0.05					0.05				
Londis, Trafalgar Road, Tenby, SA70 7DN	0.1		19	0.1	0.1		19	0.1					0.1				
Poundland, White Lion Street, Tenby, SA70 7AZ	0.1		19	0.1	0.1		19	0.1					0.1				
Premier Stores, South Parade, Tenby, SA70 7DL	0.02		19	0.03	0.02		19	0.03					0.03				
The Little Pantry, High Street, Tenby, SA70 7EU	0.1		19	0.1	0.1		19	0.1					0.13				
Sainsbury's Superstore, Upper Park Road, Tenby, SA70 7LT	12.9	2.0	19	17.7	12.6	2.2	19	17.7	19	1.9			15.81	-1.92	-10.8	-1.88	-10.6
Tesco Express, High Street, Tenby, SA70 7AB	1.4	0.1	19	1.7	1.3	0.1	19	1.7	2	0.15			1.55	-0.17	-10.1	-0.15	-9.0
Tenby Town Centre		7.5	19	8.9	0.0	8.2	19	9.7			29	0.45	9.29	0.41	4.6	-0.45	-4.6
Centre Total	14.6	9.6		28.8	14.4	10.5		29.6	21	2.0	29	0.45	27.10	-1.69	-5.9	-2.49	-8.4
Kilgetty																	
Co-Op Food, Carmarthen Road, Kilgetty, SA68 0YA	1.6		19	1.9	1.5		19	1.8	2	0.15			1.66	-0.19	-10.0	-0.15	-8.4
New Hedges																	
Morrisons Daily, St. Annes's Drive, New Hedges, SA70 8TN	0.4		19	0.5	0.4		19	0.5	0.4	0.04			0.46	-0.05	-9.3	-0.04	-7.7
Saundersfoot																	
Tesco Express, Brewery Terrace, Saundersfoot, SA69 9HG	0.8		19	0.9	0.8		19	0.9	1.0	0.1			0.83	-0.12	-12.3	-0.10	-10.7
Beyond PCA																	
Milford Haven Out of Centre																	
Tesco Superstore, Haven's Head Business Park, Milford Haven, SA73 3AU	19.6	3.8	19	27.8	19.3	4.1	19	27.9	1	0.1	2	0.03	27.69	-0.1	-0.5	-0.17	-0.6
Pembroke Dock Centre																	
Asda, Gordon Street, Pembroke Dock, SA72 6DA	11.5	1.0	19	14.9	11.3	1.1	19	14.8	10	1.0	2	0.03	13.77	-1.1	-7.7	-1.02	-6.9
Pembroke Dock Town Centre		11.7	19	13.9		12.8	19	15.2			13	0.20	15.01	1.1	8.2	-0.20	-1.3
Pembroke Dock Out of Centre																	
Lidl, Pier Road, Pembroke Dock, SA72 6TR	10.0	0.5	19	12.4	9.8	0.5	19	12.3	12	1.2	10	0.16	10.92	-1.5	-12.2	-1.36	-11.1
Tesco Superstore, London Road, Pembroke Dock, SA72 6DS	29.0	4.8	19	40.2	28.5	5.3	19	40.2	16	1.6	14	0.22	38.35	-1.9	-4.6	-1.81	-4.5
Aldi, Eastern Avenue, Pembroke Dock, SA72 4AA	16.2	0.7	19	20.0	15.9	0.7	19	19.7	16	1.5	4	0.06	18.16	-1.8	-9.2	-1.58	-8.0
Pembrokeshire Retail Park, London Road, Pembroke Dock, SA72 6DT		12.3	19	14.6	0.0	13.4	19	16.0			8	0.12	15.88	1.29	8.8	-0.12	-0.8
Haverfordwest																	
Aldi, Salutation Square, Haverfordwest, SA61 2LG	1.0		19	1.2	1.0	0.0	19	1.1	0.3	0.03			1.11	-0.1	-4.5	-0.03	-2.8
Tesco Extra, Fenton Trading Estate, Portfield, Haverfordwest, SA61 1BU	5.7	2.6	19	10.0	5.6	2.9	19	10.1	0.7	0.07			10.08	0.1	1.2	-0.07	-0.7
Marks and Spencer (M&S), Withybush Retail Park, Haverfordwest, SA61 2PY	1.5	4.1	19	6.7	1.5	4.5	19	7.1	1.3	0.1			7.02	0.3	4.8	-0.12	-1.7
Morrisons Superstore, Bridge Meadow Lane, Haverfordwest, SA61 2EX	2.0	0.1	19	2.4	2.0	0.1	19	2.4	0.8	0.08			2.33	-0.1	-4.6	-0.08	-3.3
Other																	
Tesco Extra Carmarthen									0.9	0.08							
Spar Narberth									0.04	0.004							
Lidl Carmarthen									0.1	0.01							
Inflow									16	1.54	18	0.2					
									100	9.7	100	1.6					

Notes

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

[3] allowance for non-resident spend e.g. visitors, inflow as per SWWRRS

[4] = [1]+[2]+[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.

[7]=[3] inflow as per SWWRRS

[8]=[5]+[6]+[7]

[9] drawn from table 11b

[10] CS estimate reflective of existing stores trading position

[11]=[8]-[9]-[10]

[12]=[11]-[4]

[13]=[11]-[4]/[4]*100

[14]=[11]-[8]

[15]=[11]-[8]/[8]*100

2022 prices