CARNEYSWEENEY

PLANNING AND REGENERATION

Planning & Retail Statement
PAC DRAFT

Client Name: Lidl Great Britain Ltd

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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 London Road, Pembroke Dock.

1.1.2 At Pembroke Dock, Lidl is currently represented by its out of centre store at Pier Road. The existing store is one of Lidl's first-generation stores, and the site and store are small and constrained. Owing to Lidl's growing popularity (and now well-established market share of the local grocery retail market) the existing store fails to deliver Lidl's modern day operational requirements, for customers and staff, both in terms of floorspace, internal operations and car parking provision. This planning application seek permission for a new store off London Road to enhance Lidl's presence within Pembroke Dock.

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

1.1.4 This report is not a standalone document and 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.

1.1.5 The remainder of this report is structured as follows:

- Section 2 provides a detailed description of the site and the surroundings;
- Section 3 provides a summary of the relevant development plan policies;
- 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 key planning considerations; and
- Section 9 presents the overall conclusions.

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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') lies on London Road, Pembroke Dock. The application site extends to approximately 1.1ha. It is located at the southern side of London Road (A477), currently accessed off Issac Way, as shown on Figure 1.0 below. The Site lies approximately 1.2km west of Pembroke Dock centre and is an out of centre location in retail policy terms.

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

2.1.2 Land to the east and south of the application site forms part of the wider site ownership (shown in blue in Figure 1.0 above). The proposed development has been designed to ensure that access to the wider site is achievable for future development. The proposed access road includes a spur that can be extended to the east and sufficient room has been allowed for access to be extended to the southern parcel of land.

2.1.3 Pembroke Dock is identified as a 'Hub Town – Haven Hub' (Tier 1 Settlement) within the settlement hierarchy in the Pembrokeshire County Council adopted Local Development Plan (LDP) Policy SP 12. It is identified as a 'Town Centre' in the retail hierarchy (LDP Policy SP 4). The Site lies within the Pembroke Dock Settlement Boundary.

2.1.4 The Site is previously developed land and currently comprises scrub land and hardstanding. The Site is bound to the north by London Road, and to the east further scrub land and hardstanding leading to Issac Way, with the Pembroke Dock Ambulance Station and an employment unit beyond. To the south, beyond further scrub land and hardstanding lies the railway. To the west lies an existing industrial unit housing various uses including Cleddau

Carpets and Cheeky Chimps Children's Play Centre. The existing vehicular access to these units is within the Site.

2.1.5 The Site is open to the surrounding scrub land and hardstanding and is separated from London Road by a vegetated embankment (with the Site sitting higher than the road). The western boundary is fenced. The wider setting is predominantly industrial in nature, with industrial and employment parks surrounding. A cemetery lies to the northwest.

2.1.6 The Site lies outside of the Coal Mining Reporting Area and Surface Coal Resource as identified on the Mining Remediation Authority Interactive Map. 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.

2.1.7 The Site is not affected by any conservation areas or listed buildings, according to Pembrokeshire County Council (PCC) and Cadw mapping facilities. We understand the nearest heritage assets are the Grade II Listed Bangeston Hall, c.800m from the Site (Cadw ref: 6309) and a group of Listed Building within Pembroke Dock Town Centre (around 1.2km from the Site). The Site is not affected by any Public Rights of Way.

2.1.8 The Milford Haven Waterway Site of Special Scientific Interest (SSSI) and Pembrokeshire Marine / Sir Benfro Forol Special Area of Conservation (SAC) lies to the north of the Site on the opposite side of the A477 London Road, within 100m of the Site.

2.1.9 The Site is predominantly flat, sitting atop the embankment which rises from London Road on the northern edge of the Site.

2.2 Active Travel and Site Accessibility

2.2.1 The nearest bus stop is adjacent to the Site on the A477 London Road, which provide services between Monkton and Milford Haven, via Pembroke Dock. The nearest train station is Pembroke Dock, around 1km west of the Site. The A477 London Road benefits from a shared cycle/footway on its entire length from the Site to the Town Centre.

2.3 Planning History

2.3.1 The Pembrokeshire County Council's online planning history reveals previous applications associated with use as a cold store and motorcycle shop. The most recent approval was for the demolition of the former chill store, showroom/workshop and a new pitched roof over an existing store/substation (to allow use by bats) (application ref: 12/0430/PA). The permission was implemented, and the Site has remained cleared and vacant since. We understand there has been no active, beneficial use of the Site for over 20 years.

2.4 The Proposed Development

2.4.1 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".

2.4.2 The proposals are shown on the Proposed Setting Out Plan (Drawing no. P403E) enclosed at Appendix A and comprise:

- The erection of a Class A1 food store of total floorspace of 1,969 sqm (GIA) (c.1,347 sqm net sales);
- 127 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

2.4.3 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

2.4.4 Vehicle access and egress will be taken from the existing access to the industrial estate to the west off London Road (A477). A dedicated pedestrian route will be formed further east, directly from the existing shared footway/cycleway on the A477.

2.4.5 The proposal provides 127 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

2.4.6 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.

2.4.7 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

2.4.8 Careful consideration has been given to the boundary treatment and landscaping taking account of the surroundings. Open boundaries are maintained where possible, with fencing used to secure the Site where required.

2.4.9 The proposals include a new landscaping scheme incorporating soft landscaping and habitat/biodiversity enhancements.

2.5 Lidl Operating Model

2.5.1 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.

2.5.2 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".*

2.5.3 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.

2.5.4 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.

2.5.5 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.

2.5.6 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.

2.5.7 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.

2.5.8 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.

2.5.9 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.

2.5.10 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.

2.5.11 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.

2.5.12 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.

2.5.13 Meanwhile, as of February 2023 45% of Lidl's British fruit and veg suppliers were LEAF Marque certified - a gold standard in sustainable farming - meaning they have robust water and nature conservation plans in place. This figure is due to reach 100% in 2024.

2.5.14 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.

2.5.15 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.

2.5.16 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.

2.6 Pre-application Consultation and Engagement

2.6.1 The application submission follows discussions with Pembrokeshire County Council Officers, initiated in March 2025 whereby the draft proposals were submitted to the LPA for comment. A meeting was held with planning officers on 24 April 2025. The feedback from the LPA included the following points:

- The principal policy issues to be addressed in any subsequent planning application are whether the site represents a sustainable location to accommodate the proposed development, the potential impact of the proposed development on existing centres/ retail provision, and the detailed characteristics and disposition of development that might take place on the wider site.

- Evidence should be provided to demonstrate that the proposal will not prejudice a satisfactory comprehensive development of the wider site.

- 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 including Tenby, Saundersfoot, Pembroke, Pembroke Dock and Narberth and impact on retail provision in Kilgetty and New Hedges), sequential approach to site selection and evidence of need.

- Any subsequent planning application should demonstrate how the proposed scheme will deliver sustainable transport links with the town centre and promote active travel.

- A list of validation requirements, along with additional requested supporting information.

2.7 Statutory Planning Application Consultation

2.7.1 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.

2.7.2 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.

2.7.3 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.

3.4 Pembrokeshire Local Development Plan (LDP)

3.4.1 The Pembrokeshire County Council adopted their LDP in February 2013. It forms part of the statutory development plan alongside Future Wales - The National Plan 2040.

3.4.2 The LDP Proposals Map (see extract at Figure 1.1 below) shows that the application site falls within allocation EMP/096/00005 (Policy GN.40 new waste management facilities). It has been confirmed through pre-application discussions that this identified need has now been met through development of PCC's 'Eco Park' facility on land at Amoco Road, Milford Haven (applications 21/1102/PA and 21/1104/PA) and consequently little weight should be given to Policy GN.40 in the consideration of any proposal for this site.

3.4.3 In retail policy terms, the application site, whilst located within the defined Settlement Boundary, is not located within a designated retail centre and therefore occupies an 'out-of-centre' location.

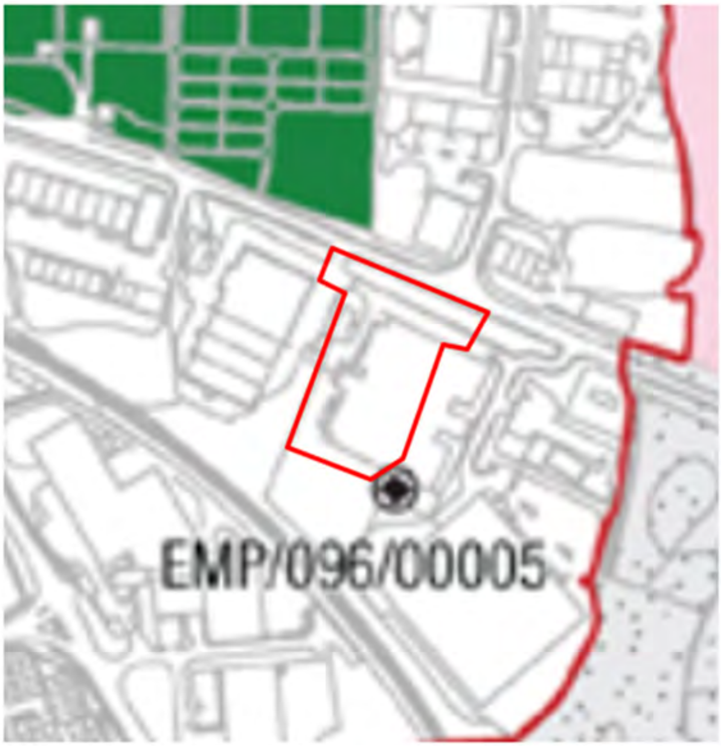

Figure 1.1: Extract of Pembrokeshire LDP Proposals Map (approximate Site boundary outlined in red)

3.4.4 The LDP policies of relevance to the proposed development are discussed in turn below:

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

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 (including Pembroke Dock) and then Local Retail Centres.

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

Policy SP 12 The Settlement Hierarchy identifies Pembroke Dock as a 'Hub Town – Haven Hub'

Policy SP 14 Hub Towns states that within Hub Towns (including Pembroke Dock), development will sustainable communities and relationships between the towns. Development in locations which support and reinforce the roles of the towns, and opportunities for new retail facilities, are promoted. Development should include appropriate land uses which are well-related to the Settlement Boundary and be accessible to services by means of a range of sustainable modes of transport.

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.

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.

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.

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.

Policy GN.13 Retail Allocations allocates sites for retail development. The Site is not allocated.

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.

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

Policy GN.40 New Waste Management Facilities allocates sites for the provision of new waste management facilities. The sites listed offer, in accordance with the Regional Waste Plan, a choice of potential locations and sites for new in-building and open-air waste handling and treatment facilities. The sites are identified to direct development interest to potentially appropriate sites to (in combination with existing facilities) meet identified waste management needs over the Plan period (up to 2021). Site Ref: EMP/096/00005 'Kingswood, Pembroke Dock' is shown on the LDP Proposals Map to be within the Site. As discussed above, pre-application discussions have confirmed that GN 40 should be given little weight due to the need identified in the policy having been met elsewhere. No further consideration of Policy GN.40 is to be given within this Statement.

3.5 Other Material Considerations

Pembrokeshire Local Development Plan Review 2017-2033 Deposit 2 Plan

3.5.1 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, the existing LDP will remain in place for all planning decisions, in line with advice issued by the Welsh Government. Notwithstanding this, the emerging Revised LDP is a material consideration in decision making.

3.5.2 Within the Second Revised Deposit LDP, the Site is included within a draft Safeguarded Strategic Employment allocation S/EMP/096/00005 for Use Classes B1, B2 and B8 under proposed Policy SP15.

3.5.3 The emerging Revised LDP policies of relevance to the proposed development are discussed in turn below:

- 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."
- Draft Revised LDP Policy SP 6 Settlement Hierarchy - A sustainable Settlement Strategy identifies Pembroke Dock as an 'Urban Settlement – Regional Growth Area' (Tier 1 Settlement).
- 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. Pembroke Dock is identified as a 'Town Centre'.
- 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.

- 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.
- 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.
- 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.
- 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.

Supplementary Planning Guidance (SPG)

3.5.4 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 Biodiversity SPG (May 2021)
- Pembrokeshire Planning Obligations SPG (September 2016)
- Pembrokeshire Parking Standards SPG (June 2013)

South West Wales Regional Retail Study (SWWRRS 2017)

3.5.5 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.

3.5.6 In the SWWRRS Pembroke Dock is recognised as a key service, employment and retail centre (page 39). The Asda food store was noted as a major draw and key anchor for the town centre, with St Govan's Shopping Centre being an important link between Asda and the traditional retail centre. This was found to offer an interesting range of shops and mix of units. Issues relating to the visual quality of the entrance to the town centre from the Asda direction were identified and low footfall was found to be insufficient to maintain retail businesses within the centre. It found that the number of vacancies was likely to exceed any locally generated demand. There was potential to improve the local food and drink offer as this sector was found to be underrepresented.

3.5.7 Pembroke is noted as an important tourist destination, offering an attractive and high-quality town centre with a significant retail and service offer. The town was found to be generally healthy, having a complementary role to Pembroke Dock, which was reflected in the retail and service offer. Ensuring the centre achieves its role as a local centre as well as one meeting tourist needs was identified as a key challenge (page 39).

3.5.8 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.

3.5.9 In respect of need, the report finds (in paragraphs 12.10 – 12.13) that whilst Pembroke Dock and Pembroke are in proximity, they serve different functions in their retail offer and customer base. This is reflected in the capacity assessment which identifies the balance of forecast retail floorspace towards Pembroke Dock. No capacity is identified in either centre for additional convenience floorspace. Pembroke Dock was found to be the dominant centre in terms of attracting retail expenditure. Out of centre foodstores serving Pembroke Dock were found to account for 15.8% of convenience expenditure, supported by the Tesco and Aldi stores.

3.5.10 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."* (paragraph 10.13).

Planning Policy Wales Edition 12 (February 2024)

3.5.11 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".

3.5.12 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

3.5.13 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 or 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 Pembroke Dock town centre. The following analysis draws upon established sources of retail data (such as Experian GOAD reports) and our own site visits/surveys (May 2025) 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 5 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 Pembroke Dock Town Centre

4.3.1 Pembroke Dock lies on the banks of the River Cleddau. The town is 3 miles northwest of Pembroke and is immediately at the junction of the A477. Within the Pembrokeshire Local Development Plan (LDP), Pembroke Dock is considered as a 'Hub Town – Haven Hub' (LDP Policy SP 12), with Pembroke Dock identified (in the supporting text for LDP Policy SP 14) as a key service, employment and retail centre. Pembroke Dock is identified as a 'Urban Settlement – Regional Growth Area' (i.e. remains a Tier 1 Settlement) in the draft revised LDP (Policy SP 6).

4.3.2 Pembroke Dock Town Centre mainly runs along Dimond Street and Queen Street. The centre has a strong presence of comparison and retail services.

Diversity of Uses

4.3.3 CarneySweeney has carried out an assessment of the composition of the retail centre in May 2025 based on the extent of the centre outlined in the LDP. A plan of Pembroke Dock Town Centre is shown at Appendix C for reference.

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

Table 4.1: Centre Composition – Pembroke Dock

Sector	Units 2016		Units May 2025		UK Average 2025
	No.	%	No.	%	%
Convenience	7	6.0%	7	6.9%	9.3%
Comparison	34	29.3%	23	22.6%	26.1%
Retail Services	17	14.7%	24	23.5%	15.8%
Financial & Business Services	20	17.2%	12	11.8%	7.9%
Leisure Services	28	24.1%	11	10.8%	26.5%
Other	2	1.7%	0	0%	0%
Vacant	8	6.9%	25	24.5%	14.1%
Total	116	100%	102	100%	100%

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

4.3.5 The centre totals 102 units and the highest represented category in the centre is the vacancy units (24.5%), which is higher than the UK average of 14.1%. Retail Services and Financial & Business Services are also higher than the UK average. The Asda foodstore to the north drives Town Centre visits and linked trips.

Vacancies

4.3.6 During the site visit, there were 25 identified vacant units. It was evident that some of these units were subject to some refurbishment investment or reoccupation. The majority of the vacant units are located along Queen Street and Dimond Street; they are typically small traditional terraced units.

Accessibility

4.3.7 The retail centre is easily accessible by both public and private transport. The centre is well located and can be accessed from A477.

4.3.8 The centre is served by bus stops that are located on Pembroke Dock Police Station and Pembroke Dock Station which is just outside the Town Centre boundary. These bus stops provide services to surrounding areas including Angle, Tenby & Haverfordwest. There is Pembroke Dock train station just outside of the Town Centre boundary. The train service stops towards Cardiff Central.

4.3.9 Most of the pavements throughout the centre are well maintained and the pavements also have sufficient space for less abled users. 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

4.3.10 In respect of pedestrian activity levels, the busiest observed area is at Dimond Street, specifically by Morrisons Daily, Boots & Greggs. Due to the limited retail offers on Meyrick Street, it was observed to have a low footfall level.

4.3.11 Overall, there was a low footfall level throughout the Town Centre, this is due to the low levels of convenience provision, resulting in less frequent visits within the Town Centre.

Environmental Quality

4.3.12 The retail centre is generally tidy and well maintained. A bench is located to the west of St Govan's Shopping Centre, which creates a welcoming environment. There are no major litter or graffiti issues observed in the retail centre. Overall, the centre's environmental quality is considered to be good.

Summary

4.3.13 Pembroke Dock Town Centre is easily accessible and perceived to be safe and has well maintained shopping environments. The centre benefits from a good mix of commercial uses largely reflective of the UK average. However, the Town Centre has a high vacancy rate. Despite this, Asda provides an anchor and drives visits and other indicators including its accessibility, environmental quality and strong service and comparison mix means the centre is overall considered to be vital and viable in servicing its function.

4.4 Pembroke Town Centre

4.4.1 Pembroke is a town located close to the estuary of the River Cleddau. The town is characterized by its medieval layout, with a main street leading from the Pembroke castle and remnants of town walls. Pembroke is to the southeast of Pembroke Dock and the town centre mainly runs along Main Street (A4139). The centre has a strong presence of retail and financial and business services.

4.4.2 The SWWRRS's health check for Pembroke finds (Appendix 12):

> *"Pembroke is a healthy and historic centre that has an established reputation for its retail and service offer. The centre is currently healthy and its complementary role to Pembroke*

Dock is reflected in the mix. The financial services sector is strong but the importance of the centre for the local population is reduced by the low levels of convenience provision resulting in less frequent visits and a relatively constrained catchment. The through traffic supports the centre in terms of generating awareness and passing trade but has a detrimental effect on the environmental quality. The western end of the centre near the castle appears to be trading well but the more recent developments off the main road appear to be less successful. Ensuring the centre achieves its role as a local centre as well as one serving the tourist sector is therefore the key challenge going forward."

Diversity of Uses

4.4.3 CarneySweeney has carried out an assessment of the composition of the retail centre in July 2025 based on the extent of the centre outlined in Pembrokeshire County Council's Local Development Plan (2013). A plan of Pembroke Centre is shown at Appendix C for reference.

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

Table 4.2: Centre Composition – Pembroke

Sector	Units 2016		Units September 2024		Units July 2025		UK Average 2025
	No.	%	No	%	No.	%	%
Convenience	7	6.0%	7	6.2%	4	3.6%	9.3%
Comparison	34	29.3%	23	20.4%	23	20.5%	26.1%
Retail Services	17	14.7%	18	15.9%	18	16.1%	15.8%
Financial & Business Service	20	17.2%	12	10.6%	11	9.8%	7.9%
Leisure Services	28	24.1%	24	21.2%	27	24.1%	26.5%
Other	2	1.7%	0	0%	0	0%	0%
Vacant	8	6.9%	29	25.7%	29	25.9%	14.1%
Total	116	100%	113	100%	112	100%	100%

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

4.4.5 The centre totals 112 units and the highest represented category in the centre is the vacancy units (25.9%), which is higher than the UK average of 14.1%. Financial & Business Services and retail services are also higher than the UK average.

Vacancies

4.4.6 During the site visit, there were 29 identified vacant units. It was evident that there are some of these units were subject of investment or reoccupation.

Accessibility

4.4.7 The town centre is easily accessible by both public and private transport. The centre is well located and can be accessed from A4139.

4.4.8 Pembroke is served by bus stops that are located on the Main Street within the town centre boundary. These bus stops provide services to surrounding areas including Angle, Tenby, Haverfordwest, and Pembroke Dock. Pembroke train station lies outside of the Town Centre boundary. The train services stops towards Cardiff Central and Pembroke Dock.

4.4.9 Most of the pavements throughout the centre are well maintained. Some of the pavements in the retail centre were narrow. Although, some parts of the pavements also have sufficient space for less abled users. 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

4.4.10 In respect of pedestrian activity levels, the busiest observed area is by the Pembroke Castle Shop and within Willings Passage on Main Street. Due to the limited retail offers on Northgate Street, it was observed to have a low footfall level.

4.4.11 Overall, there was a moderate footfall level throughout the Town Centre, this is due to the low levels of convenience provision, resulting in less frequent visits within the Town Centre.

Environmental Quality

4.4.12 The retail centre is generally tidy and well maintained. There are benches and planting located throughout the town centre, which creates a welcoming environment. There are no major litter or graffiti issues observed in the retail centre. Overall, the centre's environmental quality is considered to be good.

Summary

4.4.13 Pembroke has a high vacancy rate and there is a potential to improve the town centre. Pembroke town centre is easily accessible and is perceived to be safe. The town centre has a well-maintained shopping environment. Although there is a high vacancy rate, the town centre is still considered to be vital and viable in servicing the centre function.

4.5 Tenby Town Centre

4.5.1 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.

4.5.2 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

4.5.3 CarneySweeney has investigated the composition of the town centre based on the extent of the centre outlined in the Experian GOAD plan. 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 copy of which is attached at Appendix C. A breakdown of units is set out in Table 4.1 below:

Table 4.1: Centre Composition - Tenby

Sector	Units September 2022		Units January 2024		UK Average 2025 %
	No.	%	No.	%	
Convenience	18	9.6%	12	6.6%	9.3%
Comparison	61	32.6%	59	32.4%	26.1%
Retail Services	11	5.9%	14	7.7%	15.8%
Leisure Services	73	39.0%	60	33.0%	26.5%
Financial & Business Services	12	6.4%	14	7.7%	7.9%
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 2025 – Experian GOAD data.

4.5.4 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 26.1%. The retail service sector numbers 14 units, representing 7.7% of the centre. This level of provision is below the national average of 15.8%. The leisure services sector numbers 60 units, representing 33% of the centre. This level of provision is above the national average of 26.5%. The financial and business services sector numbers 14 units, representing 7.7% of the centre. This level of provision is slightly below the national average of 7.9%.

4.5.5 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.

4.5.6 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

4.5.7 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

4.5.8 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

4.5.9 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.

4.5.10 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

4.5.11 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.

4.5.12 Lower levels of footfall were observed at St Julians Street and Bridge Street, potentially due to their peripheral location or less active retail frontages.

4.5.13 Pedestrian accessibility on the traditional town centre areas of South Parade Street and High Street is good, with no major impediments.

Environmental Quality

4.5.14 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

4.5.15 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.

4.6 Saundersfoot Centre

4.6.1 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.

4.6.2 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

4.6.3 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 - Saundersfoot

Sector	Units 2016		Units May 2025		UK Average 2025 %
	No.	%	No.	%	
Convenience	9	13.6%	6	8.5%	9.3%
Comparison	28	42.4%	20	28.2%	26.1%
Retail Services	3	4.5%	11	15.5%	15.8%
Financial & Business Services	2	3.0%	0	0%	7.9%
Leisure Services	18	27.3%	30	42.3%	26.5%
Other	2	3.0%	0	0%	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 2025 – Experian GOAD data.

4.6.4 The centre totals 71 units and the highest represented category is Leisure Services (42.3%), higher than the UK average of 26.5% 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

4.6.5 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

4.6.6 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).

4.6.7 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.

4.6.8 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

4.6.9 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

4.6.10 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

4.6.11 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.

4.8 Narberth Town Centre

4.8.1 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.

4.8.2 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

4.8.3 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: Centre Composition - Narbeth

Sector	Units 2016		Units May 2025		UK Average 2025 %
	No.	%	No.	%	
Convenience	9	10.1%	10	10.6%	9.3%
Comparison	39	43.8%	38	40.4%	26.1%
Retail Services	6	6.7%	9	9.6%	15.8%
Financial & Business Services	13	14.6%	5	5.3%	7.9%
Leisure Services	20	22.5%	28	28.9%	26.5%
Other	0	0.0%	0	0%	0%
Vacant	2	2.2%	4	4.3%	14.1%
Total	89	100%	94	100%	100%

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

4.8.4 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 26.1%. 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.

4.8.5 Between 2016 and May 2025, the number of units used for financial and business services has more than halved.

Vacancies

4.8.6 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

4.8.7 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.

4.8.8 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

4.8.9 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.

4.8.10 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

4.8.11 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

4.8.12 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.

4.9 Kilgetty

4.9.1 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

4.9.2 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: Centre Composition - Kilgetty

Sector	Units May 2025		UK Average 2025 %
	No.	%	
Convenience	2	10.5%	9.3%
Comparison	3	15.8%	26.1%
Retail Services	5	26.3%	15.8%
Financial & Business Services	1	5.3%	7.9%
Leisure Services	8	42.1%	26.5%
Other	0	0%	0%
Vacant	0	0	14.1%
Total	19	100%	100%

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

4.9.3 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 (42.1%), which is much higher than the UK average of 26.5%. Convenience and Retail Services are also higher than the UK average.

Vacancies

4.9.4 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

4.9.5 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).

4.9.6 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.

4.9.7 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

4.9.8 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.

4.9.9 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

4.9.10 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

4.9.11 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.

4.10 New Hedges

4.10.1 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

4.10.2 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: Centre Composition – New Hedges

Sector	Units May 2025		UK Average 2025 %
	No.	%	
Convenience	1	14.3%	9.3%
Comparison	0	0%	26.1%
Retail Services	1	14.3%	15.8%
Financial & Business Services	1	14.3%	7.9%
Leisure Services	3	42.9%	26.5%
Other	0	0%	0%
Vacant	1	14.3%	14.1%
Total	7	100%	100%

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

4.10.3 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 26.5%. Convenience and Financial & Businesses are also higher than the UK average.

Vacancies

4.10.4 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

4.10.5 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).

4.10.6 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.

4.10.7 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

4.10.8 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

4.10.9 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

4.10.10 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.

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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.

5.2 Quantitative Considerations

Table 5.0: Retail Turnover Uplift of Proposed Development, 2030

	Gross Internal Area (sqm)	Total Net Sales (sqm)	Trading density (£/sqm)	Turnover 2025 (£m)	Turnover 2030 (£m)	Turnover 2030 inc. Inflow (£m)
	[1]	[2]	[3]	[4]	[5]	[6]
Existing Lidl foodstore, Pier Rd		*968*				
convenience floorspace		*774*	*7,576*	*5.9*	*5.9*	*6.5*
comparison floorspace		*194*	*4,318*	*0.8*	*0.9*	*1.0*
Total					*6.8*	*7.5*
Proposed Lidl Foodstore, London Rd	1,949	1,347				
convenience floorspace		1,078	7,576	8.2	8.2	9.0
comparison floorspace		269	4,318	1.2	1.3	1.4
Total					9.5	10.4
Turnover Uplift						
convenience					2.3	**2.5**
comparison					0.4	**0.4**
Total					2.7	**2.9**

Source: Appendix D

5.2.1 The above table provides a comparison of the turnover of the proposed new store at London Road, with the existing store (to be replaced) at Pier Road. In summary, it can be seen that the new, larger store is anticipated to turnover and additional c.£2.9m than the existing store. The vast majority of the additional turnover (c.86%) is anticipated to be generated by the additional convenience floorspace (c.£2.5m).

Table 5.1: Existing Discount store convenience turnover, 2025

	Net Floorspace sqm	Sales Density £/sqm	Benchmark Turnover £m	Survey Turnover £m	Overtrading +/_ £m
	[1]	[2]	[3]	[4]	[5]
Aldi, Eastern Avenue, Pembroke Dock	1,003	10,675	10.7	16.2	5.4
Lidl Pier Road, Pembroke Dock	774	7,576	5.9	10.0	4.1

Source: Appendix D

5.2.2 The above table provides a comparison of the trading performance of the existing discount stores in Pembroke Dock, Aldi at Eastern Avenue, and Lidl at Pier Road. Column 3 'Benchmark Turnover' provides the 'expected' turnover for stores of the size, based on company averages. Column 4 provides the 'Survey Derived' turnover based on the local household survey of shopping patterns in Pembroke Dock specifically. A comparison shows (Column 5) both stores are trading significantly in excess of their expected performance i.e. 'overtrading'. The Aldi, Eastern Avenue store is overtrading c.£5.4m (c.50%), Lidl at Pier Rd is overtrading by c.£4.1m (c.69%); a combined overtrade at both stores of c. £9.5m.

5.2.3 It should be noted the turnover of the Lidl Pier Rd store is c.£10.0m (see Table 5.1 above, column 4). The expected (benchmark) turnover of the proposed new store at London Rd is c.£10m (see column 6, Table 5.0 above). Thus, it can be seen the proposed larger store at London Road is scaled so as to address the level of overtrade experienced at the Pier Road store; the new larger store will 'decongest' and enhance the local customer experience.

5.2.4 The above analysis demonstrates the latent quantitative need for the proposed additional floorspace.

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 overtrading, operational inefficiencies/ deficiencies, and improving accessibility.

5.3.3 When considering 'need' it is crucial to note in this instance that the proposal does not propose an entirely new operator and store but seeks to deliver an improved local store for an existing operator in Pembroke Dock; one which is long-standing and already well-established within the locality. The existing store has been trading for many years; it is a small, first-generation store, but popular and heavily relied upon by the local community. The fact that Lidl is taking the significant commercial investment decision to deliver an improved premises and wider site is, itself, a very strong indication itself of a) the strength of the existing customer base; b) the importance of the store in meeting local needs; and c) the pressing need for enhanced premises.

Meeting Local Consumer Need

5.3.4 As outlined above, Lidl's existing store at Pier Rd is one of Lidl's "first generation" stores. The operational and customer requirements were very different then than they are today. Lidl (and the store's) growing popularity since first opening means the store as currently sized and arranged is no longer fit for purpose; it is no longer able to accommodate Lidl's operational format which has evolved over the years as the company's popularity has grown.

5.3.5 The store's age/format is leading to store operational issues e.g. limited space for display of product range. The rationale for the proposed store is clear; an improved store is required to ably meet local need. Obtaining planning consent will ensure that Lidl continues to be able to suitably serve local needs from what is a well-established existing retail destination. The enhanced store will help improve store operations. Overall, an improved customer experience will be achieved.

5.3.6 It is important to note the smaller format Limited Assortment Discounters (LAD) such as Lidl operate from far smaller stores than is typical of the large format 'big four' operators. It is now widely accepted that smaller format LADs have become increasingly popular in the last decade. Whilst the adequacy of existing provision is often assessed by local authorities in quantitative capacity terms, the effect of the increasing popularity of existing LADs and the qualitative issues that arise are typically overlooked. In scenarios such as this, where customer demand means the smaller, "first generation" Lidl stores are no longer capable of meeting local need, Lidl typically seeks to deliver enhanced stores. This will ensure a high level of customer experience can be maintained at London Road, Pembroke Dock.

5.3.7 At 1,349sqm net in total the proposed store remains modestly scaled by supermarket standards. Notwithstanding this, it comprises the latest generation of Lidl store, providing ancillary staff/welfare facilities, manager's office and customer toilets etc. Its delivery will be of direct benefit to both staff and customers alike. The store and site layout are more spacious than the existing store to be replaced and is better equipped to cater for its shoppers.

5.3.8 Chapter 10 of PPW advises that wherever possible retail provision should be located in proximity to other commercial businesses, facilities for leisure, community facilities and employment. Whilst out of centre, this location is an accessible location. We expect delivery of an improved store to serve as a catalyst for future development at the wider site and will likely boost investor confidence. The development has been designed to ensure it does not prejudice delivery of the adjoining land; on the contrary, Lidl's investment is anticipated to attract other investment for other employment generating uses at the wider site.

5.4 Summary

5.4.1 Quantitative and qualitative need for the proposed development has been demonstrated. Improved retail provision will help will decongest existing provision and 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.

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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 1.2km from the Pembroke Dock Town Centre boundary and is therefore an out of centre location in retail policy terms. Site Ref: EMP/096/00005 'Kingswood, Pembroke Dock' is shown on the Pembrokeshire Local Development Plan Proposals Map to be within the Site. As discussed above, pre-application discussions have confirmed that GN.40 should be given little weight due to the need identified in the policy having been met elsewhere.

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 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." (Dundee[2], 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 Lakes[3] , which was an appeal recovered and allowed by the Secretary of State. As well as declaring the Dundee judgement of "seminal importance" (paragraph 8.44) it also noted that English policy and guidance called for flexibility to be demonstrated and for 'available' sites to be considered but provides no guidance on the degree of flexibility of the timescale within which a site may become available.
- 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 Judgment[4] found that in applying the sequential test the identity of an applicant is not "generally" relevant but that "there are instances where identity may matter". In this regard it is reasonable to take the position that the 'broad type of development' may comprise a LAD operator, rather than any foodstore or convenience store so that it is reasonable to apply the sequential test on the basis that there is only limited scope for LAD retailers to be flexible in format.

1 Tesco Stores Limited v Dundee City Council (Tesco Stores Ltd v. Dundee City Council [2012] UKSC13)
2 Ibid
3 APP/G2815/V/12/2190175 - LXB RP (Rushden) Limited v East Northamptonshire Council, June 2014
4 Aldergate Properties v Mansfield DC High Court Judgment [2016] EWHC 1670

- Furthermore, the appellant's own commercial objectives are relevant to the question of suitability, even where these are site specific (Telford Forge[5] appeal, para 16).
- In the Scotch Corner appeal[6] 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.
- 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

[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

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 palleted goods.

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

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 would be little commercial motivation for delivering a replacement store any smaller. 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 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 It is important to recall the proposed development is for a replacement local foodstore. In respect to surrounding centres including Tenby, Saundersfoot, Narberth, Kilgetty, Penally and

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

New Hedges these centres lie **beyond the primary catchment area** of the proposed store (in Zone 6 of the SWRRS Study Area). Indeed, Lidl is currently pursuing separate proposals for a foodstore to serve this materially different catchment. Accordingly, these centres have been discounted from the sequential assessment as inherently **unsuitable** for what is proposed replacement development. Accordingly, the focus of the search is on Pembroke Dock and Pembroke centres.

6.6 Pembroke Dock (Town Centre)

6.6.1 Pembroke Dock is categorised as a Town Centre within the adopted retail hierarchy for Pembrokeshire. A comprehensive review of sites has been undertaken to identify suitable and available in-centre and edge-of-centre sites. The plans at Appendix C detail the extent of the search area for this. The locations where we have identified sites to possibly accommodate the proposed development are listed below.

- Pembrokeshire Retail Park
- St Govan's Shopping Centre
- Pembroke Dock Harlequins Rugby Football Club
- Pembroke Borough A.F.C Football Ground
- Vacant Land on King Williams St
- Pembroke Dock Town Centre Vacant Units

Pembrokeshire Retail Park (Edge of Centre)

6.6.2 Pembrokeshire Retail Park (Figure 1.3) is a well-established development situated on London Road with major retailers including Tesco, Argos, Sue Ryder, Peacocks, Farmfood, B&M and McDonalds. During the site visit in May 2025, there were no vacant units identified at the retail park. However, there is a vacant parcel of land adjacent to Peacocks (Figure 1.4) with a site area of 580.6sqm. At 580.6sqm, the site is too small for the proposed development, even allowing for flexibility. Accordingly, the site has been discounted.

Figure 1.3: Pembrokeshire Retail Park

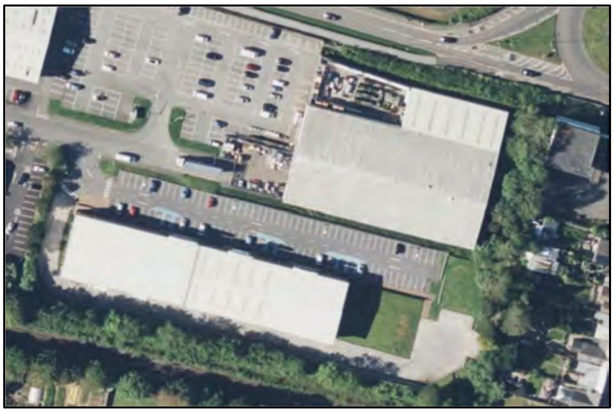

Figure 1.4: Vacant Land at Pembrokeshire Retail Park

St Govan's Shopping Centre – Retail Allocation (In Centre)

6.6.3 St Govan's Shopping Centre is allocated for retail development within the Pembrokeshire County Council's Local Development Plan (2013). The site is referenced as RT/096/01 under Policy GN.13 (LDP) and its' allocated use is for a mix of comparison and convenience units and has an area of 0.23ha. Although the shopping centre is allocated for retail use, there were no vacant units identified that are big enough to accommodate the proposed Lidl store. Accordingly, the site is deemed unsuitable and unviable and has therefore been discounted in the sequential search.

Figure 1.5: St Govan's Shopping Centre

Pembroke Dock Harlequins Rugby Football Club (Out of Centre)

6.6.4 Pembroke Dock Harlequins Rugby Football Club is located to the north of London Road and lies opposite Pembrokeshire Retail Parl. We understand the rugby club is in use and occupied. The site is also safeguarded for the Protection and Creation of Outdoor Recreation Areas (Policy GN. 34) within the LDP. This site is unavailable and has been discounted from the sequential search.

Figure 1.6: Pembroke Dock Harlequins Rugby Football Club

Pembroke Borough A.F.C Football Ground (Edge of Centre)

6.6.5 The football ground on land adjacent to Charles Thomas Avenue (Figure 1.7) is used for Pembroke Borough A.F.C. The site is understood to be in use, well maintained and not marketed for sale. Moreover, it is safeguarded for Protection and Creation of Outdoor Recreation Areas (Policy GN. 34) within the LDP. This is considered unavailable and unsuitable and has been discounted.

Figure 1.7: Pembroke Borough A.F.C Football Ground

Vacant Land on King Williams St (Edge of Centre)

6.6.6 The vacant land lies on King Williams St (Figure 1.8), outside of the Town Centre boundary and measures approximately 0.74 ha. The site is not being actively marketed. Notwithstanding this, the site does not have a commercial prominence to sustain a main foodstore to attract passing trade and access is inadequate, lying off a primary road. The site is considered unsuitable and has therefore been discounted.

Figure 1.8: Vacant Land on King Williams St

Vacant Units

6.6.7 Table 6.3 below shows those units which are being marketed as available to rent and for sale within Pembroke Dock.

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

Address	Description	Size (sqm)
Units 18, 20, 24, 31, 33 and 35 St Govan's Shopping Centre	Retail units	Each unit less than 100
2, 4, 24, 37, 39 and 46 Dimond Street	Retail units	Each unit less than 100
13-15 Dimond Street	Shop (ex-Woolworths)	782 across two floors (419 ground floor & 363 first floor)
17 Dimond Street	Jewellery Store	170
30-32 Dimond Street	Unknown	260
22, 34, 44, 46 and 48 Queen Street	Retail units	Less than 100
95 Queen Street	Restaurant	110
2A Meyrick Street	Career Guidance Service	170
Studio 4, 4 Meyrick Street and	Nail Salon	Less than 100
13 Meyrick Street	Telecommunications contractor	100
17 Gordon Street	Card store	215

Notes: CarneySweeney site visit July 2025

6.6.8 The above listed vacant units listed are far too small to accommodate the proposed development.

6.6.9 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.

6.6.10 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. The site is too small to accommodate the proposed development.

6.7 Pembroke (Town Centre)

6.7.1 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.

6.7.2 A comprehensive review of sites has been undertaken to identify suitable and available in-centre and edge-of-centre sites. The Former East Gate School Site falls within the defined Pembroke Town Centre boundary and has been identified as a site that could possibly accommodate the proposed development.

Former East Gate School, East End Square (In Centre)

6.7.3 The former East Gate school is located at the end of the Main Street, near the Royal Oak pub. The site (Figure 1.9) is vacant and has an area of approximately 2,200sqm. The East Gate School is owned by Pembrokeshire County Council was last occupied in 2016 but because of the deterioration of the inside of the buildings it was closed down and has remained empty.

Figure 1.9: Former East Gate School, East End Square

6.7.4 It was evident during the site visit that the site is not marketed for sale. Moreover, as part of the 'Westgate to Eastgate' levelling up award for Pembroke, Pembrokeshire County Council is reviewing and assessing to determine its potential for redevelopment for alternative usage for the former East Gate school. Therefore, this indicates that the site is unavailable.

6.7.5 CarneySweeney have 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 Town Centre. The table below shows that there are a limited number of premises within Pembroke that are actively being marketed as available. However, the size of the units are far too small and do not meet the floorspace requirements of Lidl to accommodate a new retail foodstore. There are no sites located within 300m of Pembroke Town Centre which are available and of a sufficient size to meet the proposed site floorspace requirements.

Table 6.4: Vacant Sequentially Assessed Sites, Pembroke Town Centre

Address	Description	Size (sqm)
9 Main Street	Retail/Residential	587
17 Main Street, The Castle Inn	Commercial	220
27 Main Street (Former Bank)	Retail	480
35 Main Street (Former Bank)	Retail	204
42 Main Street	Retail	42
60 Main Street, Shaftesbury House	Commercial	263
61 Main Street	Retail	272
Building Plot, The Commons	Plot of Land	600

6.9 Conclusion

6.9.1 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.

6.9.2 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 potential trading impact of the proposals in respect of the anticipated diversion of retail trade to the proposed (enlarged) foodstore, with particular regard to Pembroke Dock centre.

7.1.2 PPW paragraph 4.3.26 advises that for development of 2,500sqm gross or more an impact assessment should accompany planning applications for main town centre uses that are not in a centre. It is important to note from the outset of this chapter that the proposed development, for the most part, effectively constitutes the re-provision of existing floorspace, albeit incorporating additional floorspace as part of delivering an enhanced store. In this respect the majority of the floorspace proposed is not "new" floorspace. Accordingly, this chapter focuses on the additional sales floorspace 'uplift' proposed i.e. **379sqm net**. The proposed additional floorspace is well below the PPW/TAN4 floorspace threshold whereby impact assessments are typically sought. Notwithstanding this, in the interests of robustness, this section provides a proportionate assessment of impact for the proposed floorspace uplift.

7.1.3 The assessment is underpinned by a newly commissioned household survey, carried out independently by NEMS market research in 2024, to help understand existing shopping patterns.

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

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

7.6.3 The following paragraphs assess the potential impact of the proposal on in-centre turnover, before conclusions are drawn on the impact on in-centre turnover and trade. In considering impact on in-centre trade this section draws on the assessed retail turnover of the proposal and also considers the growth in population and available expenditure within the catchment area. A detailed trading assessment of the potential impact that the proposal is likely to have on the patterns of retail expenditure in the surrounding area is then provided.

Turnover

7.6.4 Turnover is set out in detail in at **Appendix D**. The annual turnover of the proposed additional floorspace (i.e. turnover Uplift) is assessed to be c.£2.9m in 2030 (allowing for inflow). It is assessed that 90% of the proposed development's turnover would be drawn from the catchment which, given the nature of the foodstore, is considered to be robust.

Expenditure Growth

7.6.5 The tables at Appendix D apply the estimates of expenditure per person to the resident population within the Study Area in order to outline the available retail expenditure generated over the period to 2030.

7.6.6 The expenditure analysis demonstrates there is sufficient expenditure growth to support any additional comparison turnover. Moreover, it is important to note Lidl's non-food offer is very modest, sold on a WIGIG basis (When It's Gone It's Gone) and typically purchased on an impulse basis. The choice of goods is constantly changing within the store and no type of comparison goods predominates at any given time. Crucially, Lidl is not, in itself, a comparison goods destination and thus the proposed store's capacity to affect local comparison shopping patterns is minimal. There is, therefore, very limited potential for Lidl's comparison goods range to impact upon any specific retailer/ centre as there is no consistency in the range of comparison retail goods that Lidl sells.

7.6.7 As such, the remainder of this analysis focuses on the quantitative effect of proposed additional convenience floorspace.

Trading Assessment

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

7.6.9 Set out at Table 11 of Appendix D is an assessment of how the development 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. Assessing the pattern of trade draw to the proposal on the basis that the redeveloped foodstore will compete predominantly like for like with other foodstores.

iv. Calculating the quantitative impact of the proposal, in terms of:

- The percentage reduction in trade at each store/centre at 2030; and
- The percentage change in retail turnover in each store/centre between 2025 to 2030.

7.6.11 The analysis is based on an assessment of existing stores/centre turnovers derived from the recently commissioned household survey underpinning the assessment.

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.

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 trading patterns. It is important existing trading patterns are taken into account, especially given the proposed development is for a redeveloped store (the existing store already forms part of the local retail environment).

7.6.14 Impact is assessed on a ‘like for like’ basis in respect of the convenience sector. It is widely accepted that retail uses tend compete with their most comparable competitive facilities. For example, in an area already served by modern convenience stores, the effects of new bespoke stores are likely to fall disproportionately on the existing competing modern stores. Their proportionate impact on smaller and local independent retailers, for example, may be less. Likewise, a proposal for a ’main food shop’ supermarket is also less likely to compete with smaller ‘top-up’ convenience stores and corner shops.

7.6.15 These accepted patterns suggest that the proposed development will continue to compete predominantly on a ‘like for like’ basis with discount competitors and large/medium sized foodstores; 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/stores.

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 surrounding, competing centres/stores within the period to 2030. However, Table 11 highlights that the surrounding area is predominantly served for main food shopping by large out of centre foodstores, notably Aldi at Eastern Avenue (which is overtrading by c.50%) and Tesco at London Road. The proposed development is anticipated to compete with these stores, in much the same manner as the existing store at Pier Road. The new store will draw the majority of its additional trade from these stores. Both stores lie out of centre and are not protected from commercial competition. Nevertheless, they are both well equipped to absorb the trading effect.

7.7 Summary

7.7.1 In summary, the proposed development constitutes the redevelopment and relocation of an existing, long standing and well-established local retail store, to deliver an enhanced facility for local shoppers.

7.7.2 The enhanced store proposes just an additional c.379sqm net floorspace, well below the PPW floorspace threshold, but which provides the focus of a proportionate impact assessment.

7.7.3 The assessed impact of the proposed development is within acceptable levels, the vast majority of which falls on out of centre, unprotected destinations/facilities. These stores are equipped to absorb the relatively modest anticipated trading impact.

7.7.4 It has been demonstrated the proposed development does not result in any significant adverse impact on in-centre turnover and trade; in particular there is no evidence to suggest it will unacceptably affect the vitality and viability at Pembroke Dock centre.

CARNEYSWEENEY

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
- Landscape and Visual Impact
- Ground Conditions
- Flood Risk and Drainage
- Biodiversity and Green Infrastructure
- Transport
- 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 As outlined in Section 3.0 above, the LDP Proposals Map shows that the application site falls within allocation EMP/096/00005 (Policy GN.40 new waste management facilities). It has been confirmed through pre-application discussions that this identified need has now been met through development of PCC's 'Eco Park' facility on land at Amoco Road, Milford Haven (applications 21/1102/PA and 21/1104/PA) and consequently Policy GN.40 does not present a policy conflict to the proposed development of the site.

8.2.3 The Site lies outside in an out-of-centre location in retail terms, albeit within the Pembroke Dock settlement boundary. Within the adopted LDP, Pembroke Dock is considered as a 'Hub

Town – Haven Hub' (LDP Policy SP 12), with Pembroke Dock identified (in the supporting text for LDP Policy SP 14) as a key service, employment and retail centre. Pembroke Dock is identified as a 'Urban Settlement – Regional Growth Area' (i.e. remains a Tier 1 Settlement) in the draft revised LDP (Policy SP 6).

8.2.4 In terms of retail development, Policy SP 4 of the LDP sets out the settlement hierarchy for the County. Pembroke Dock is identified as a Town Centre. The proposed Lidl intends to serve the Pembroke Dock catchment area within which it is situated, as a replacement to the existing store in the town centre which is no longer fit for purpose. The proposals do not seek to detract from the existing retail provision within the area but, rather, complement it by continuing to provide much needed local access to the popular and much needed LAD retail format.

8.2.5 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. The site is considered to pass the sequential test. Moreover, there is no evidence to indicate the proposal would give rise to a significantly adverse impact on the trade, turnover, vitality and viability of town centres.

8.3 Design, Appearance and Landscaping

8.3.1 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. A Visual Assessment was requested for this during pre-application discussions and has informed the proposals. The application is supported by the Visual Assessment (Corscadden Associates), along with a Landscaping Scheme (Corscadden Associates) and Design & Access Statement (HTC Architects).

8.3.2 The Visual Assessment confirms that there are limited long distance views of the Site due to topography and vegetations, with the proposed scheme to be seen in the context of the existing surrounding buildings. Users on London Road heading in both directions will have only limited views into the Site and of the store building. The proposed building will be clearly seen from Issac Way by users accessing the PowerSite unit and ambulance station, and by users on London Road and those accessing Kingswood Industrial Estate at the Site entrance.

8.3.3 The landscaping scheme addresses the visual impact. The Issac Way view is mitigated by car park boundary planning and increase scrub planting/growth. The vehicular and pedestrian entrances both utilise landscape mitigation to provide a setting for the development. The store building will be screened to an extent by bank planting and trees.

8.3.4 The proposal requires the removal of two existing trees and works to the tree group on the Site frontage. All the trees on the Site are of low or poor quality. Details are set out in the submitted

Arboricultural Report. Replacement tree planting is proposed to compensate for the loss of these trees and to deliver biodiversity enhancement.

8.3.5 The single storey development 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.

8.3.6 Details of the proposed landscaping are outlined on the Landscape Scheme accompanying the application. In summary:

- The large native blocks away from public access at the rear of the store, and behind the hedgerow and turning head, will be used for nature conservation with all native planting of trees, shrubs and perennials and for log piles and a hibernacula.
- The landscaping in the carpark will compensate for tree and shrubs and will include species native to the local area alongside pollinator species to increase foraging opportunities.
- The south and east boundaries form linear links of hedgerows and native blocks also reinforced by native tree and shrub planting forming ecological corridors.
- The west boundary proposed native blocks and trees are to reinforce the boundary losses.
- The north boundary is retained in part and losses compensated by tree and planting beds.

8.3.7 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 Polices GN 1 and GN 2).

8.4 Ground Conditions

8.4.1 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.

8.4.2 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.

8.4.3 The Phase 1 assessment reports that the earliest available mapping of 1866 shows the Site to be occupied by two fields and devoid of structures, with the Site appearing to have been developed between 1909 and 1953. 1968 mapping shows the majority of the Site occupied by the footprint of a Woollen Factory, with associated tank and chimney in the western area. An Electricity Sub Station is first labelled adjacent to the western boundary in 1992. Between the mapping of 2006 and 2024, there appears to have been a clearance of all previous structures on-site.

8.4.4 Published geological maps record that the Site is directly underlain by Pembroke Limestone Group bedrock, designated as a Principal Aquifer. The site is located in a Higher Probability Radon Area as 10% to 30% of properties are estimated to be at or above the Action Level. The Site was found to be located within an area of High hazard from Unexploded Ordnance (UXO) due to WWII bombardment. However, Zetica's Pre-Preliminary Desk Study Assessment for the Site has not identified any evidence that the site was bombed during either the First or Second World Wars, and concluded that a detailed desk study is not required.

8.4.5 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 for contaminants of concern;
- Ground gas monitoring; and
- Ground investigation to enable preliminary foundation design.

8.4.6 The Phase 2 report provides details of the outcomes of detailed site investigations and makes recommendations for foundation design. It confirms the infiltration rates at the Site. Ground gas protection measures are found to be unnecessary.

8.4.7 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.

8.5 Flood Risk and Drainage

8.5.1 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.

8.5.2 The applicant has commissioned a technical report by Waterco 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.

8.5.3 With regards to drainage, the proposed development will introduce hardstanding in the form of buildings, car park and access road. To comply with statutory standards for sustainable drainage systems, surface water runoff will be managed through the use of sustainable drainage systems to accommodate storm events up to and including the 1 in 100 year plus 40% climate change event.

8.5.4 Infiltration tests carried out by Remada Geo Consultants in June 2025 (as discussed above) show that infiltration techniques are suitable at this site and an infiltration-based drainage system is proposed, comprising permeable surfacing in the car parking (excluding HGV route) and soakaways. Rain gardens and a bioretention channel are also proposed, providing additional amenity and biodiversity benefits.

8.5.5 It is proposed to discharge foul drainage into the public sewer.

8.5.6 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.

8.6 Biodiversity and Green Infrastructure

8.6.1 The application is supported by a Preliminary Ecological Appraisal (PEA) prepared by Biodiverse Consulting. The PEA presents the key ecological constraints and opportunities in relation to the development. The site was subjected to PEA walkover survey during which habitats were assessed in line with the UK Habitat Classification (UKHab) methods.

8.6.2 The report identifies that there are no designated sites within the Site but there is one national designated site within 2km and five internally designated sites within 10km of the Site. The Site comprises primarily sparsely vegetated urban land with areas of sealed surfaces (both of low ecological value), along with mixed scrub of local ecological importance. The habitats were found to afford a range of potential habitats for bats, birds, Great Crested Newts, reptiles, hedgehog and common toad. One invasive species (contoneaster sp) was found on the Site.

8.6.3 The report recommends:

- Four monthly non-breeding bird surveys from November – February, with at least one nocturnal visit.
- Seven reptile surveys between March and October.
- Habitat Suitability Indec (HIS) assessment of offsite ponds, followed by an eDNA survey of suitable ponds to determine presence/absence of Great Crested Newts.
- A Preliminary Roost Assessment of the structure on Site if the structure is to be impacted during construction. This is not required as the structure is not to be affected.
- 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.

8.6.4 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. Reptile and non-breeding bird surveys are scheduled for completion in the relevant seasons and an Ecological Impact Assessment will be prepared on completion. An Ecological Management Plan is also to be prepared.

8.6.5 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.

8.7 Transport

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

8.7.2 Following the review of the accessibility options by different modes of transport, the TA concludes that the site has good levels of accessibility. Access to the site on foot and by cycle is of a good standard, there are bus stops and railway station nearby providing access to a range of local destinations. Moreover, the site is also well connected to the adjacent highway network allowing it to maximise the custom it attracts from existing pass-by traffic.

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

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

8.7.5 In terms of impact off-site, the TA has concluded that there is no evidence of any severe impact to the interests of the free flow of traffic or of any unacceptable impact to highway safety resulting from the proposals.

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

8.7.7 Accordingly, the submitted TA demonstrates that the proposed development is fully accords with LDP Policy GN.1 (and draft revised LDP Policy GN1), PCNPA 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.

8.8 Economic Benefit

8.8.1 The construction phase will bring employment opportunities to the local population. 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 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.

8.8.2 Local shoppers are currently at an economic disadvantage insofar as they do not have easy access to. The development will assist enable the continued provision of the 'limited assortment discount' retail format and offer provided by Lidl, which is an important consideration in the context of the cost-of-living challenges faced by local consumers in the short and medium term.

8.9 Sustainability

8.9.1 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.

8.9.2 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.

8.9.3 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.

8.9.4 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).

8.10 Summary

8.10.1 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 of the proposals.

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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 and all associated development at land at London Road, Pembroke Dock.

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:

- Quantitative and qualitative need for the proposed development has been demonstrated.
- 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;
- The site is accessible by a choice of means of transport. The development will have no unacceptable impact on the local highway network. The development will reduce car journeys and increase settlement self-containment in accordance with LDP policy;
- Health checks of nearby centres within and beyond the primary catchment area demonstrate that Pembroke Town 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 enable continued 'LAD' provision to Pembroke Dock, to the benefit of local consumers.
- The proposals are considered acceptable in all other technical aspects including design, flood risk and drainage, and ecology considerations.

9.1.4 It has been demonstrated that the Lidl proposal will deliver a number of major benefits to the areas of Pembroke Dock including:

- Enhanced provision of a limited assortment discount foodstore, providing the local community with access to affordable, healthy and fresh produce;
- The provision of major employment and economic benefits including construction and retail jobs;
- Bringing a long vacant, unused site back into beneficial economic use;
- Provision of a high-quality design and development that sits comfortably within the surrounding context;

- Provision of active travel measures; and
- A net benefit in biodiversity through proposed landscaping scheme.

9.1.5 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.

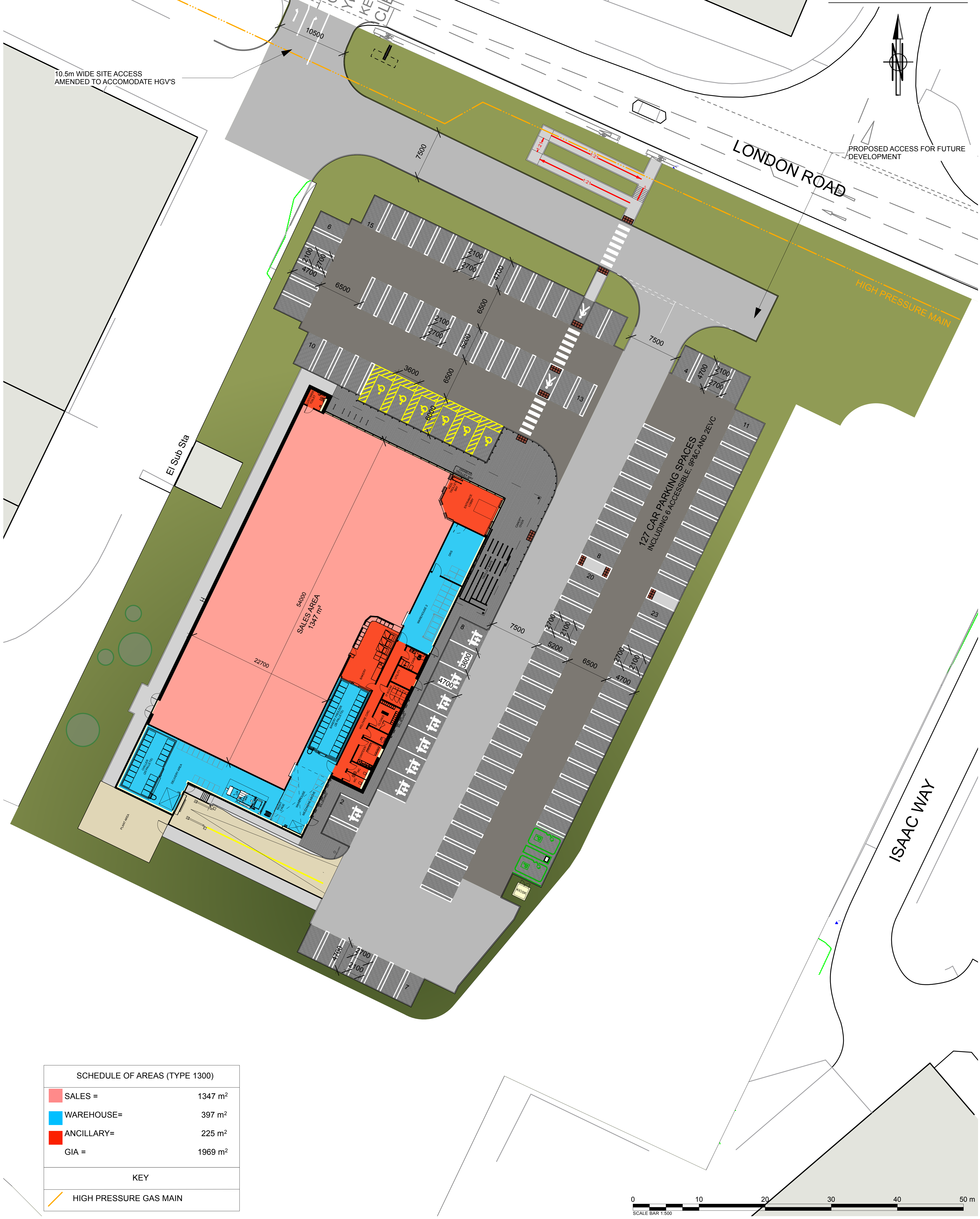
Appendices

CARNEYSWEENEY

Appendix A – Proposed Layout Plan

ALL DIMENSIONS SHOULD BE CHECKED ON SITE BEFORE WORK COMMENCES

DESIGN SUBJECT TO FURTHER SURVEYS AND CONSULTANT INFORMATION



SCHEDULE OF AREAS (TYPE 1300)	
SALES =	1347 m²
WAREHOUSE=	397 m²
ANCILLARY=	225 m²
GIA =	1969 m²

KEY
HIGH PRESSURE GAS MAIN

Rev.	Date	Description	Drawn
E	09/07/2025	UPDATED SURFACE TREATMENT FOLLOWING DRAINAGE CONSULTANTS REPORT	BMS
D	02/07/2025	Updated site plan following discussion with Highways and client	BMS
C	24/06/2025	removed boundaries,updated schedules, 'Schedule of Areas' colouring shown	DK
B	16/06/2025	Updated to Latest Lidl Specification BBS 2025 T13	BMS

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client: Lidl GB Ltd.

project: Pembroke Dock

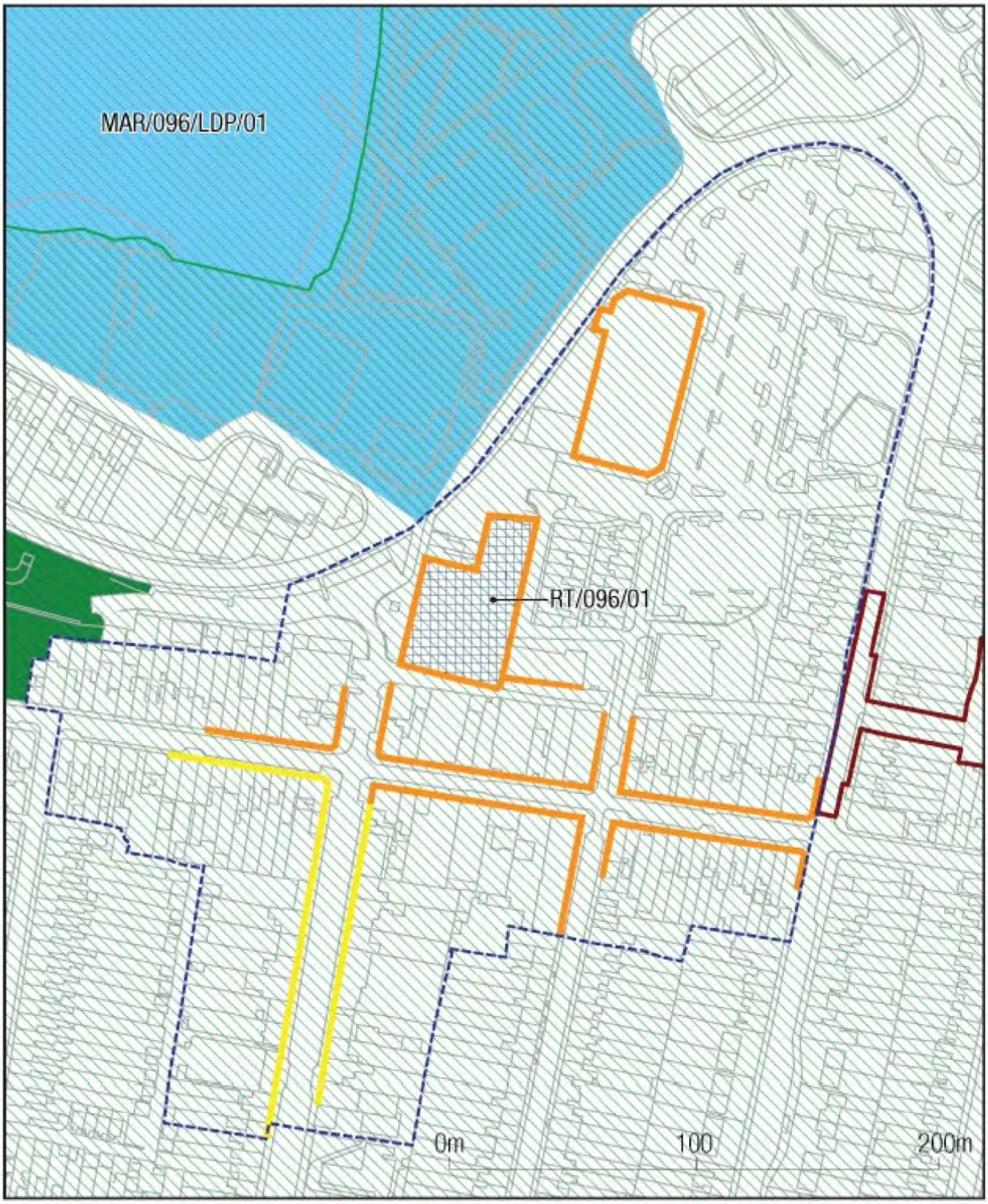
drawing title: Proposed Setting Out Plan

date: April 2025
status: Planning
scale: 1:500 @ ISO A3
drawn: KA checked: BM
job no. 3305 dwg no. P403 rev. E

Appendix B – Primary Catchment Area Plan (PCA)


Pembroke Dock PCA
Talbenny
St Brides
Hasguard
Marloes
St Ishmaels
Sandy Haven
Dale
Tiers Cross
Johnston
Robeston Cross
Troopers Inn
Rosemarket
Hill Mountain
Milford Haven
Hazelbank
Burton
Hook
New Park
Martletwy
Pembrokeshire Coast National Park
Yerbeston
Thomas Chapel
Ludchurch
Stepaside
Kilgetty
Pleasant Valley
Lawrenny
Creswell Quay
Cresselly
Jeffreston
Cresswell
Whitehill
Saundersfoot
Redberth
Carew
New Hedges
Tenby
St Florence
Manorbier Newton
Penally
Skrinkle
Monastery
Pembroke Dock
Pembroke
Stoops Lake
Lamphey Bishop's Palace & Lamphey
Lamphey
Angle
Pwllcrochan
Bentlass
Gilead
Orielton
Castlemartin
Warren
Freshwater East
Cheriton or Stackpole Elidor
Buckspool
Pembroke Dock-Rosslare
Leaflet | Map © 1987 -2025 HERE

Appendix C – Pembroke Dock Centre Plan



Pembroke Dock Centre / Canol Doc Penfro

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Appendix D – Statistical Tables

Lidl Great Britain Ltd
London Road, Pembroke Dock

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 - PCA	21,053	21,082	21,109	21,144	21,167	21,210	157	0.7
Zone 6 Tenby	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
London Road, Pembroke Dock

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 - PCA	2,220	2,204	2,191	2,182	2,174	2,165
Zone 6 Tenby	2,328	2,312	2,298	2,289	2,280	2,271

Notes:
per capita figures sourced from 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 (sales via stores))

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 - PCA	2,723	2,748	2,783	2,839	2,902	2,965
Zone 6 Tenby	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 (sales via stores))

2022 prices

Lidl Great Britain Ltd
London Road, Pembroke Dock

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

Zone	2025	2026	2027	2028	2029	2030	Change 2025-2030 £m	Change 2025-2030 %
					[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 - PCA	46.7	46.5	46.3	46.1	46.0	45.9	-0.8	-1.7
Zone 6 Tenby	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 - PCA	37.9	37.7	37.5	37.4	37.3	37.2
Zone 6 Tenby	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 - PCA	8.9	8.8	8.8	8.7	8.7	8.7
Zone 6 Tenby	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	Change 2025-2030 %
					[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 - PCA	57.3	57.9	58.8	60.0	61.4	62.9	5.6	9.7
Zone 6 Tenby	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
London Road, Pembroke Dock

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%				
Iceland, 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						
Steynton Farm Shop, Thornton Road, Milford Haven, SA73 1AW		3.08%				
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, Goose'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, Lamphey 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 Lamphey 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 Lamphey Road, Pembroke, SA71 5JJ				4.33%		0.33%
One Stop, Albion Square, Pembroke Dock, SA72 6XE				2.35%		
One Stop, East End Square, Pembroke, SA71 4DG				2.25%		
Premier Stores, High Street, Pennar, Pembroke Dock, SA72 6PA						
Spar, Lamphey Service Station, A4139, Lamphey, SA71 5NW				3.13%		
Spar, Long Mains, Monkton, SA71 4NA			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%		
Wisebuys, 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, Heywood 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 7JD						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, B4585, Manorbier, Tenby, SA70 7TJ						4.51%
Londis, Trafalgar Road, Tenby, SA70 7DN						1.49%
Morrisons Daily, St. Annes'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 Copper Hog, 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						
Aldi, Salutation Square, Haverfordwest, SA61 2LG	2.31%	0.32%			0.27%	
Aldi, Stephens Way, Carmarthen, SA31 2BG						
Asda Express, Heol Y Meinciau, Pontyates, Llanelli, SA15 5TR						
Asda, Heol Y Mynydd, Gorseinon, 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, Pensarn, Carmarthen, SA31 2NG						
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 2PY			0.24%			
Iceland, Cross Hands Retail Park, Llandeilo Road, Cross Hands, Llanelli, SA14 6NB						
Iceland, Pemberton Park, Llanelli, SA14 9UZ						
Iceland, Picton Place, Haverfordwest, SA61 2LX		0.32%				
Iceland, 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 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, Pontardulais Road, Cadle, Fforest-fac						
Marks and Spencer (M&S), Withybush Retail Park, Fishguard Road, King William Street, Hav	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 Pensarn, 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, Llysonnen Road, Carmarthen, SA33 5DT						
Premier Stores, A478, Maelfa, SA66 7NQ						
Premier Stores, Magdalen Street, Haverfordwest, SA61 1JJ						
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 5JJ						
Spar, Bear Square, St Clears, SA33 4AG						
Spar, East Gate, Llanboidy, Whitland, SA34 0EJ						
Spar, Glandy Cross, Efailwen, Clynderwen, SA66 7XB						
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 Nulls, SFT

Lidl Great Britain Ltd
London Road, Pembroke Dock

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
Iceland, 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	16.2
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										
Co-Op Food, Goose's Lane, Pembroke, SA71 4DT				0.2	1.3	1.5	0.5	0.0	0.5	2.0
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	0.6
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, Lamphey Village Centre										
Local shops, Llanreath 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
Local shops, Upper Lamphey 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
Morrisons Daily, Upper Lamphey Road, Pembroke, SA71 5JJ					0.4	0.4		0.0	0.0	0.4
One Stop, Albion Square, Pembroke Dock, SA72 6XE					0.2	0.2				0.2
One Stop, East End Square, Pembroke, SA71 4DG					0.2	0.2				0.2
Premier Stores, High Street, Pennar, Pembroke Dock, SA72 6PA										
Spar, Lamphey Service Station, A4139, Lamphey, SA71 5NW					0.3	0.3				0.3
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
Wisebuys, Main Street, Pembroke, SA71 4JS					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
Loafley Bakery & Deli Co, Upper Frog Street, Tenby, SA70 7JD								0.02	0.02	0.02
Local shops, Begelly 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. Annes'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
Priory Farm Shop, Knightston 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
The Copper Hog, Milford Street, Saundersfoot, SA69 9EP							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, Salutation 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, Gorseinon, 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, Pensarn, Carmarthen, SA31 2NG										
Farmfoods, Swansea Road, Llanelli, SA15 3EQ										
Farmhouse Bakery, Station Road, Johnston, SA62 3PL		0.03	0.03							0.03
Home Bargains, Stephens Way, Carmarthen, SA31 2BG										
Home Bargains, Withybush Retail Estate, Fishguard Road, Haverfordwest, SA61 2PY				0.1		0.1				0.1
Iceland, Cross Hands Retail Park, Llandeilo Road, Cross Hands, Llanelli, SA14 6NB										
Iceland, Pemberton Park, Llanelli, SA14 9UZ										
Iceland, Picton Place, Haverfordwest, SA61 2LX		0.03	0.03							0.03
Iceland, 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, Llanddewi 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, Pontardulais Road, Cadle, Fforest-fach, Swansea, SA5 4BA										
Marks and Spencer (M&S), Withybush Retail Park, Fishguard Road, King William Street, Haverfordwest, SA61 2PY	0.1	0.2	0.3	0.6	0.05	0.6	0.6		0.6	1.5
Morrisons Daily, Heol Morlais, Trimsaran, Kidwelly, SA17 4DG										
Morrisons Superstore, Bridge Meadow Lane, Haverfordwest, SA61 2EX	1.2	0.1	1.3	0.4		0.4	0.3		0.3	2.0
Morrisons Superstore, Parc Pensarn, 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, Llysonnen Road, Carmarthen, SA33 5DT										
Premier Stores, A478, Maelfa, SA66 7NQ										
Premier Stores, Magdalen Street, Haverfordwest, SA61 1JJ										
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 5JJ										
Spar, Bear Square, St Clears, SA33 4AG										
Spar, East Gate, Llanboidy, Whitland, SA34 0EJ										
Spar, Glandy Cross, Efailwen, Clynderwen, SA66 7XB										
Spar, High Street, Narberth, SA67 7AS								0.02	0.02	0.02
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

Notes

Turnover derived from h/h survey and total available main and top up expenditure

2022 prices

Lidl Great Britain Ltd
London Road, Pembroke Dock

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

Destination	Zone 4								Zone 4	Zone 5								Zone 5	Zone 6								Zone 6	Total £m
	C&F	F&FC	DIY	Elec	Sm H/H	Books	Chem	Recre	Sub Total	C&F	F&FC	DIY	Elec	Sm H/H	Books	Chem	Recre	Sub Total	C&F	F&FC	DIY	Elec	Sm H/H	Books	Chem	Recre	Sub Total	
Zone 4																												
Cohens Chemist, Manchester Square, Fulke Street, Milford Haven, SA73 2JW							0.0		0.0																			0.0
Crazy But True, Great North Road, Milford Haven, SA73 2NA		0.1							0.1																			0.1
Elder Meadows Nursery, Hubberston Court, Hubberston, Milford Haven, SA73 3PU			0.0						0.0																			0.0
Enterprise Cycles, Honeyborough Business Park, Neyland, SA73 1SE								0.4	0.4								1.0	1.0										1.4
Hakin Local Centre, Milford Haven							0.1		0.1																			0.1
Havens Head Shopping Centre, off Victoria Road, Milford Haven, SA73 3AU	2.0	0.2	0.0	0.1	0.4	0.3	0.9	1.6	5.5					0.1				0.1						0.1			0.1	5.7
Home Bargains, Haven's Head Business Park, St Peter's Road, Milford Haven, SA73 2BP			0.4	0.1	0.7	0.2	0.4	0.3	2.1							0.3		0.3							0.1		0.1	2.4
Honeyborough Garden Centre, A447, Honeyborough, SA73 1SE			0.1						0.1			0.3						0.3										0.5
Honeyborough Village Centre			0.0						0.0																			0.0
Iceland, Haven's Head Business Park, Milford Haven, SA73 3AU																												
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	0.8	0.1	1.9	0.2								0.2	0.3	0.0				0.1	0.1		0.5	2.6
Neyland Town Centre	0.1	0.1				0.0	0.5	0.4	1.2													0.0					0.0	1.2
Tesco Superstore, Haven's Head Business Park, Milford Haven, SA73 3AU	0.4			0.2	0.9	0.6	0.6	0.8	3.5							0.3		0.3										3.8
Thornton Industrial Estate, Thornton Road, Milford Haven, SA73 2RX		0.1	0.0						0.1																			0.1
Zone 5																												
Aldi, Eastern Avenue, Pembroke Dock, SA72 4AA							0.1	0.1	0.1						0.0	0.1	0.2	0.3							0.2		0.2	0.7
Asda, Gordon Street, Pembroke Dock, SA72 6DA	0.2			0.0	0.0		0.0	0.1	0.4						0.3	0.1		0.3	0.3								0.3	1.0
B&M, London Road, Pembroke Dock, SA72 6TX		0.2	0.4	0.0	0.3		0.1	0.4	1.5			0.7	0.1	1.5		0.0	1.0	3.4			0.8	0.3	0.2		0.1	1.3	2.6	7.5
Bierpool Cycles, London Road, Pembroke Dock, SA72 6DT																	0.2	0.2										0.2
Cosheston Garden Centre, A477, Cosheston, SA72 4SX												0.3						0.3			0.0						0.0	0.4
Jewson, Station Road, Pembroke, SA71 4AH												0.0						0.0			0.3						0.3	0.3
Kingswood Trading Estate, London Road, Pembroke Dock, SA72 4RS											0.0		0.2					0.2		0.0	0.1	0.1					0.3	0.5
Lidl, Pier Road, Pembroke Dock, SA72 6TR																0.4		0.4							0.0		0.0	0.5
Pembroke Dock Town Centre		0.2	0.2	0.0	0.1	0.1		0.1	0.7	0.3	1.6	0.5		0.6	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	11.7
Pembroke Town Centre			0.0	0.0	0.4			0.1	0.5	0.9	0.2	0.1		0.4	0.1	1.1		2.8		0.1			0.0		0.0		0.2	3.5
Pembrokeshire Retail Park, London Road, Pembroke Dock, SA72 6DT	0.3	0.0	0.1	0.1	0.3		0.0	1.5	2.4		0.3	0.5	1.8	1.7	0.0		2.4	6.7			0.1	1.1	0.4	0.0		1.5	3.1	12.3
Screwfix, Kingswood Trading Estate, Pembroke Dock, SA72 4RS			0.2						0.2			0.4						0.4			0.4						0.4	1.0
Tesco Superstore, London Road, Pembroke Dock, SA72 6DS	0.3			0.3	0.0	0.2	0.3		1.2	0.1				0.9	0.7	1.0	0.2	3.0				0.0		0.5	0.2		0.7	4.8
Wilko, Pier Road Llanion, Pembroke Dock, SA72 6TR												0.1	0.0					0.2										0.2
Zone 6																												
Carew Village Centre																				0.3							0.3	0.3
Evans Pharmacy, Gas Lane, Tenby, SA70 8AG																									0.2		0.2	0.2
Jewson, The Green, Tenby, SA70 8ET																					0.1						0.1	0.1
Kilgetty Village Centre																				1.0					0.4		1.4	1.4
Lydstep Nurseries, The Green, Manorbier, SA70 7SJ												0.3						0.3			0.1						0.1	0.4
Lydstep Village Centre																					0.1						0.1	0.1
Manorbier Garden Centre, Station Road, Manorbier, SA70 7SN																					0.1						0.1	0.1
New Hedges Village Centre																					0.1						0.1	0.1
Sainsbury's Superstore, Upper Park Road, Tenby, SA70 7LT																0.1		0.1					0.2	0.5	1.2		1.9	2.0
Sandyhill Nurseries, Sandy Hill Road, Saundersfoot, SA69 9DR																					0.0						0.0	0.0
Saundersfoot Village Centre																			0.1		0.2	0.0	0.0	0.0	0.3		0.7	0.7
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	0.5	6.4	7.5
Tesco Express, High Street, Tenby, SA70 7AB																									0.1		0.1	0.1
Outside Survey Area																												
Aldi, Aberystwyth Road, New Town, Cardigan, SA43 1NA																												
Aldi, Salutation Square, Haverfordwest, SA61 2LG																												
Aldi, Stephens Way, Carmarthen, SA31 2BG																												
Asda, Heol Y Mynydd, Gorseinon, Swansea, SA4 4BZ																												
Asda, Murray Street, Llanelli, SA15 1BX																												
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 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																												
B&Q, Morfa Retail and Leisure Park, Bon-y-maen, Swansea, SA1 7DF																												
B&Q, Old Towy Sawmills, Glanyrafon Road, Carmarthen, SA31 3AS			0.1						0.1												0.2						0.2	0.2
B&Q, Trostre Retail Park, Parc, Trostre Road, Llanelli, SA14 9US																												
Barry Town Centre																												
Bridgend Retail Park, Cowbridge Road, Bridgend, CF31 3XX		0.0							0.0																			0.0
Bridgend Town Centre																												
Bristol Airport, Bristol, BS48 3DY																								0.0			0.0	0.0
Bristol City Centre										0.3								0.3										0.3
Caephilly Town Centre																												
Cardiff City Centre	0.4					0.1	0.1		0.6	0.9								0.9	1.2	0.1			0.0			0.6	1.9	3.3
Carmarthen Town Centre	0.5	0.0			0.0	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	3.7
Clarks Village Shoppign Centre, Farm Road, Street, BA16 0BB																			0.1								0.1	0.1
Costco, Capital Retail Park, Leckwith Road, Cardiff, CF11 8EG																0.1		0.1										0.1
Cotswold Outdoor, Spine Road East, Cirencester, GL7 5TL										0.4								0.4										0.4
Cowbridge Town Centre																												
Cribbs Causeway Retail Park, Patchway, Bristol, BS34 5TX				0.1					0.1																			0.1
Cross Hands Village Centre																				0.1							0.1	0.1
Decathlon, Culverhouse Cross, Cardiff, CF5 6XQ								0.4	0.4																			0.4
Designer Outlet, Derwen, Bridgend, CF32 9SU	0.1								0.1										0.3				0.1				0.4	0.5
Dunelm, off A484, Myrtle Hill, Carmarthen, SA31 2NG					0.5				0.5					0.1				0.1					0.8				0.8	1.4
Dunelm, Waterton Road, Bridgend, CF31 3XX					0.0				0.0																			0.0
Fforestfach Retail Park, Pontardulais Road, Cadle, Fforest-fach, Swansea, SA5 4BA										0.9								0.9		0.1							0.1	1.0
Fishguard Town Centre																												
Ford Retail Park, A484, Towy, Carmarthen, SA31 2BN		0.0							0.0											0.1		0.4					0.5	0.6
Freystrop Cross Village Centre		0.0							0.0																			0.0
Frome Town Centre						0.0			0.0																			0.0
Grimsby Town Centre																					0.1						0.1	0.1
Halfords, Bridge Meadow Lane, Haverfordwest, SA61 2EX																										0.5	0.5	0.5
Handforth Dean Retail Park, Coppice Way, Handforth, Wilmslow, SK9 3PA	0.3								0.3																			0.3
Hatfield Town Centre															0.2			0.2										0.2
Haverfordwest Town Centre	1.3	0.2	0.1	1.5	0.7	0.9	0.2	1.3	6.3	2.6	0.2	0.0	2.2	0.5	0.5	0.1	2.4	8.5	1.3	0.1	0.0	0.9	0.2	0.2	0.0	0.1	2.9	17.7
Heathrow Airport, Hounslow, TW6 1QG						0.1			0.1																			0.1
Hereford City Centre	0.3								0.3																			0.3
Home Bargains, Stephens Way, Carmarthen, SA31 2BG																												
Home Bargains, Withybush Retail Estate, Fishguard Road, Haverfordwest, SA61 2PY			0.2		0.1			0.4	0.7																0.0		0.0	0.7
Iceland, Cross Hands Retail Park, Llandeilo Road, Cross Hands, Llanelli, SA14 6NB																												
Iceland, Pemberton Park, Llanelli, SA14 9UZ																												
Iceland, Picton Place, Haverfordwest, SA61 2LX																												
Iceland, Stephens Way, Carmarthen, SA31 2BG																												
IKEA, Ferry Road, Cardiff, CF11 0XR		0.4	0.1		0.5				1.0					0.2				0.2		0.1			0.4				0.5	1.7
Jewsons, Merlins Bridge Trading Estate, Old Hakin Road, Haverfordwest, SA61 1XE			0.1						0.1																			0.1
Johnston Village Centre		0.7							0.7		0.0							0.0										0.7
Leekes, Cowbridge Road, Talbot Green, CF72 8XU																				0.1							0.1	0.1
Leekes, Cross Hands Business Park, Heol Stanllyd, Cross Hands, SA14 6RB		0.0							0.0											0.3	0.2		0.2				0.7	0.7
Lidl, Friars Park, Carmarthen, SA31 3FF																												
Lidl, Perrot's Road, Haverfordwest, SA61 2HD																												
Liverpool City Centre																										0.1	0.1	0.1
Llanelli Town Centre	0.1								0.1																			0.1
Llantrisant Town Centre																												
Llantwit Major Town Centre																												
Maes yr Eithin Retail Park, Llandeilo Road, Cross Hands, Llanelli, SA14 6RH																												
Marks and Spencer (M&S), Clarks Village Shopping Centre, Farm Road, Street, BA16 0BB	0.1								0.1																			0.1
Marks and Spencer (M&S), Kingsland High Street, Carmarthen, SA31 1RS																			0.1								0.1	0.1
Marks and Spencer (M&S), Parc Trostre Retail Park, Trostre Road, Llanelli, SA14 9UY																												
Marks and Spencer (M&S), West Swansea Retail Park, Pontardulais Road, Cadle, Fforest-fach, Swa																							0.0				0.0	0.0
Marks and Spencer (M&S), Withybush Retail Park, Fishguard Road, King William Street, Haverford	1.5								1.5	1.0				0.1				1.1	1.1				0.3		0.1		1.5	4.1
Merlin's Bridge Village Centre																								0.3			0.3	0.3
Merthyr Tydfil Town Centre						0.1			0.1																			0.1
Mike's Bikes, Prendergast, Haverfordwest, SA61 2PE																	0.2	0.2										0.2
Monmouth Town Centre															0.0			0.0										0.0
Morrisons Superstore, Bridge Meadow Lane, Haverfordwest, SA61 2EX																0.0		0.0				0.0					0.0	0.1
Morrisons Superstore, Parc Pensarn, Carmarthen, SA31 2NF																												
Morrisons Superstore, Pemberton Retail Park, Trostre Roundabout, Llanelli, SA14 9DR																												
Narberth Town Centre	0.3								0.3										0.7			0.0	0.0	0.0			0.7	1.0
Neath Town Centre																												
Newbridge Nursery & Plant Centre, Chapel Road, Crundale, SA62 4EJ												0.0						0.0										0.0
Nottage Town Centre																												
Parc Pemberton Retail Park, A484, Llanelli, SA14 9UZ																							0.4				0.4	0.4
Parc Tawe Retail Park, A4067, Quay Parade, Swansea, SA1 2AL								0.3	0.3																			0.3
Parc Trostre Retail Park, Trostre Road, Llanelli, SA14 9UY	0.3								0.3	0.1								0.1										0.4
Parc y Llyn Retail Park, Llanbadarn Fawr, Aberystwyth, SY23 3TL				0.1					0.1																			0.1
Pembrokeshire Frame, Old Hakin Road, Haverfordwest, SA61 1XF		0.1							0.1																			0.1
Penarth Town Centre																												
Pencoed Town Centre																												
Pendine Village Centre																												
Pensarn Retail Park, Stephens Way, Carmarthen, SA31 2BG		0.0			0.0				0.1	0.2				0.1				0.2	0.4	0.0	0.2		0.2				0.7	1.0
Phoenix Retail Park, Llansamlet, Swansea SA7 9EH																												
Pontyclun Town Centre																												
Pontypridd Town Centre																												
Port Talbot Town Centre																												
Porthcawl Town Centre																												
Reading Town Centre																						0.0					0.0	0.0
Redditch Town Centre					0.0				0.0																			0.0
Screwfix, Alltycnap Road, Carmarthen, SA31 3RB																												
Screwfix, Cross Hands Industrial Estate, Heol Stanllyd, Cross Hands, Llanelli, SA14 6RB																												
Screwfix, Old Hakin Road, Haverfordwest, SA61 1XE	0.2		0.1	0.0					0.4																			0.4
Screwfix, Parc Teifi Business Park, Cardigan, SA43 1EW																												
Screwfix, Pemberton Park, Llanelli, SA14 9BD																												
Springfield Retail Park, Fishguard Road, Haverfordwest, SA61 2AT	0.1	0.8	2.1	3.1	0.1	0.0	0.0	0.1	6.3	0.7	0.6	0.9	2.0	0.1			1.3	5.7	0.1	0.2	0.4	1.9	0.0				2.6	14.7
St Clears Town Centre																												
St Davids Retail Park, St David's Road, Swansea, SA6 8QL								1.0	1.0																			1.0
St Ishmaels Nurseries, off Trewarren Road, St Ishmaels, SA62 3SX			0.0						0.0																			0.0
Swansea City Centre	0.2							0.8	1.0		0.0						0.8	0.9	0.1	0.1			0.2				0.4	2.3
Talbot Green Town Centre																												
Tavernspite Garden Centre, B434, Tavernspite, Whitland, SA34 0NL												0.0						0.0										0.0
Tesco Extra, Fenton Trading Estate, Portfield, Haverfordwest, SA61 1BU	0.3	0.1		0.1	0.7	0.2	0.5	0.5	2.5													0.0				0.1	0.2	2.6
Tesco Extra, Morfa Lane, Carmarthen, SA31 3AX																							0.0				0.0	0.0
Tetbury Town Centre															0.2			0.2										0.2
The Original Factory Shop, Snowdrop Lane, Haverfordwest, SA61 1ET	0.1								0.1																			0.1
Trowbridge Town Centre	0.1				0.0		0.0		0.1																			0.1
Vincent Davies, Fishguard Road, Haverfordwest, SA62 4BT		0.3		0.0	0.4	0.1			0.8	0.1	0.9			0.3				1.3		0.3			0.4				0.8	2.9
West Swansea Retail Park, Pontardulais Road, Cadle, Fforest-fach, Swansea, SA5 4BA																												
Withybush Industrial Estate, Withybush Road, Haverfordwest, SA62 4BW		0.2							0.2											0.1							0.1	0.3
Withybush Retail Park, Fishguard Road, Haverfordwest, SA61 2PY	1.6	0.5	0.0	0.1	0.2	0.0	0.8	0.3	3.6	3.0	0.9	0.1	0.1	0.4	0.1	0.3		4.9	1.9	0.2	0.3	0.1	0.4		0.1	1.6	4.7	13.1
	11.5	4.6	4.3	6.3	6.9	3.4	5.2	11.0	53.2	12.0	4.9	4.6	6.5	7.3	3.5	5.4	11.4	55.5	10.3	4.5	4.2	5.5	6.6	2.9	4.9	9.7	48.6	157.3

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

2022 prices

Lidl Great Britain Ltd
London Road, Pembroke Dock

Table 9: Existing store convenience turnover, 2025

	Net Floorspace sqm	Sales Density £/sqm	Benchmark Turnover £m	Survey Turnover £m	Overtrading +/_ £m
	[1]	[2]	[3]	[4]	[5]
Aldi, Eastern Avenue, Pembroke Dock	1,003	10,675	10.7	16.2	5.4
Lidl Pier Road, Pembroke Dock	774	7,576	5.9	10.0	4.1

Notes

[1] estimated 80% of net sales

[2] s/d taken from GlobalData March 2025 indexed linked to 2022 price base

[3] = [1]x[2]/1,000,000

[4] table 7 (exc. inflow)

[5] = [4]-[3]

2022 prices

Lidl Great Britain Ltd
London Road, Pembroke Dock

Table 10: Retail Turnover Uplift of Proposed Development , 2030

	Gross Internal Area (sqm)	Total Net Sales (sqm)	Trading density (£/sqm)	Turnover 2025 (£m)	Turnover 2030 (£m)	Turnover 2030 inc. Inflow(£m)
	[1]	[2]	[3]	[4]	[5]	[6]
Existing Lidl foodstore, Pier Rd		*968*				
convenience floorspace		*774*	*7,576*	*5.9*	*5.9*	*6.5*
comparison floorspace		*194*	*4,318*	*0.8*	*0.9*	*1.0*
Total					*6.8*	*7.5*
Proposed Lidl Foodstore, London Rd	1,949	1,347				
convenience floorspace		1,078	7,576	8.2	8.2	9.0
comparison floorspace		269	4,318	1.2	1.3	1.4
Total					9.5	10.4
Turnover Uplift						
convenience					2.3	2.5
comparison					0.4	0.4
Total					2.7	2.9

Notes

[2] Proposed store net sales area taken from application drawings 80%/20% conv/comp split

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

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

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

[6] allowance for non resident spend (inflow)

2022 prices

Lidl Great Britain Ltd
London Road, Pembroke Dock

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

	Turnover 2025			Total Turnover 2025	Turnover 2030			Total Turnover 2030	Trade Draw to Proposal				Resultant Turnover 2030	Impact			
	Convenience	Comparison	inflow		Convenience	Comparison	inflow		Convenience		Comparison			Change 2025-30		2030 Impact	
	£m	£m	%	£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																	
Pembroke Dock Centre																	
Local shops, Pembroke Dock Town Centre	0.1	11.7	19	13.9	0.1	12.8	19	15.3			34	0.14	15.14	1.2	8.7	-0.14	-0.9
Asda, Gordon Street, Pembroke Dock, SA72 6DA	11.5	1.0	19	14.9	11.3	1.1	19	14.8	10	0.25			14.54	-0.4	-2.5	-0.25	-1.7
Pembroke Dock Town Centre	11.6	12.6	19	28.8	11.4	13.9	19	30.1	10	0.25	34	0.14	29.67	0.8	2.9	-0.39	-1.3
Pembroke Dock Out of Centre																	
Tesco Superstore, London Road, Pembroke Dock, SA72 6DS	29.0	4.8	19	40.2	28.5	5.3	19	40.2	35	0.88	21	0.08	39.19	-1.0	-2.5	-0.97	-2.4
Aldi, Eastern Avenue, Pembroke Dock, SA72 4AA	16.2	0.7	19	20.0	15.9	0.7	19	19.7	45	1.14	25	0.10	18.50	-1.5	-7.5	-1.24	-6.3
Farmfoods, Pembrokeshire Retail Park, London Road, Pembroke Dock, SA72 6DT	0.6		19	0.7	0.6	0.0	19	0.7									
B&M, London Road, Pembroke Dock, SA72 6TX	0.0	7.5	19	8.9	0.0	8.2	19	9.7									
Morrisons Daily, Dimond Street, Pembroke Dock, SA72 6JA	0.3		19	0.3	0.3	0.0	19	0.3									
One Stop, Albion Square, Pembroke Dock, SA72 6XE	0.2		19	0.2	0.2	0.0	19	0.2									
Pembrokeshire Retail Park, London Road, Pembroke Dock, SA72 6DT		12.3	19	14.6	0.0	13.4	19	16.0			10	0.04	15.96	1.37	9.4	-0.04	-0.3
Inflow									10	0.25	10	0.04					
									100	2.5	100	0.4					

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