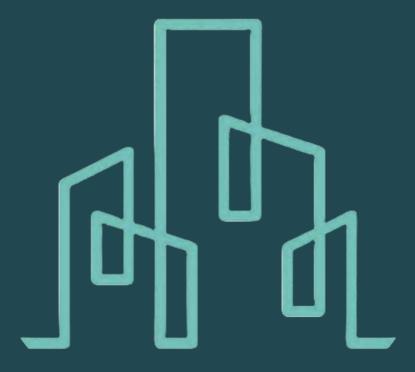
PLANNING AND REGENERATION

Planning and Retail Statement



Client Name: Lidl Great Britain Limited

Site Address: Land at Aberystwyth Road, Cardigan

Date: December 2025



Document control

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SECTION 1		
Introduction		



1.0 Introduction

1.1 Introduction

- 1.1.1 This Planning and Retail Statement is submitted on behalf of Lidl Great Britain Limited, in support of a full planning application for the demolition of the existing building and erection of a Class A1 limited assortment discount (LAD) foodstore, together with surface level car parking, landscaping, and associated development on land, currently occupied by B&M Stores, Aberystwyth Road, Cardigan.
- 1.1.2 The purpose of this report is to address the general planning and retail policy considerations relevant to the proposed development. It is intended to assist Ceredigion County Council in its assessment and determination of the application and has been prepared in accordance with the requirements set out in the Ceredigion Local Development Plan, Future Wales: The National Plan 2024 and Planning Policy Wales.
- 1.1.3 This document forms part of the overall planning submission and should be read in conjunction with the full suite of supporting documentation. A comprehensive list of drawings and technical assessments is provided in the covering letter accompanying the application.

1.2 Structure of the Report

1.2.1 This Statement is structured as follows:

- Section 2.0 Describes the location, context, and key components of the proposed Lidl foodstore development.
- Section 3.0 Sets out the relevant planning policy framework, including the Development
 Plan, Planning Policy Wales (Edition 12), and associated Technical Advice Notes (TANs).
- Section 4.0 Considers the proposals against retail policies, including evaluating the availability
 of sequentially preferable sites within nearby designated centres, in accordance with TAN
 4 and PPW12.
- Section 5.0 assesses the proposed development against the relevant planning policy framework, having regard to all material planning considerations.
- Section 6.0 provides a summary of the statement and draws conclusions on the acceptability of the proposed development.



SECTION 2

The Application Site and Proposals



2.0 Application Site and The Proposals

2.1 Applications Site

2.1.1 The site extends to approximately 0.6 hectares and is situated to the north-east of Cardigan, fronting Aberystwyth Road. It is currently occupied by a large retail unit trading as B&M Bargains (including a Garden Centre), with a dedicated surface-level car park. Access is taken directly from Aberystwyth Road. The site is bounded to the east by a Garden Centre, and to the north and east by residential properties. To the south, on the opposite side of Aberystwyth Road, is a Tesco store.

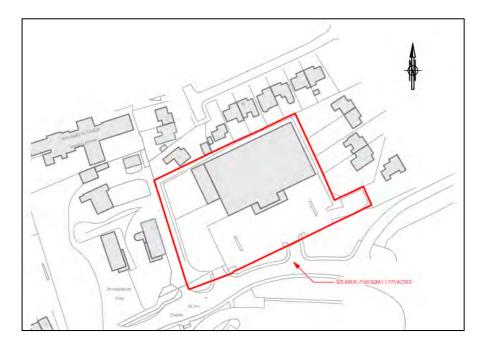


Figure 2.1 Extract of the Site Location Plan

2.1.2 The site is located around 900 metres from the designated Cardigan town centre, and is therefore considered 'out of centre' in retail planning terms. The site is not subject to any heritage designations (it lies outside the Cardigan Conservation Area) or Tree Preservation Orders. It is not affected by fluvial flooding (Flood Zone 1), although a small part of the site is affected by surface water flooding (Flood Zone 2). The site does not lie within an Air Quality Management Area (AQMA).

2.2 Active Travel and Site Accessibility

2.2.1 The site is highly accessible by all modes of transport. The entire town is within 1 mile, with key amenities such as schools, a pharmacy, a GP, and bus stops located within 0.1–1.0 miles. The area benefits from good pedestrian infrastructure, including safe crossings.



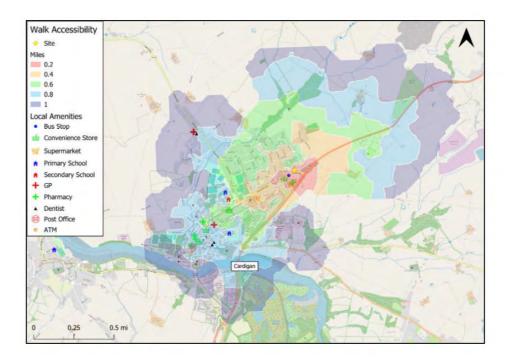


Figure 2.2 Extract from the Transport Assessment showing walking accessibility

2.2.2 Bus stops are located just 80 yards from the site, with frequent services (408, 430, 460, T5) covering a wide regional catchment.

2.3 Planning History and Fallback Position

- 2.3.1 The site's most relevant planning history is outlined below:
 - A050561 Demolition of existing buildings & erection of non-food retail (Class A1), bulky goods retail warehouse, outdoor garden centre & associated works, Approved November 2005.
 - A110470CL Use as any purpose within Class A1 of the Town and Country Planning (Use Classes)
 Order 1987, as amended, Approved September 2011.
- 2.3.2 The existing unit benefits from a lawful development certificate for open Class A1 (food and non-food) retail consent. The certificate is issued under s192 of the Act (and so relates to proposed use). The second schedule of the certificate confirms the GIA of the store to be 2,523sqm gross.
- 2.3.3 As confirmed above, the permitted use of the application site is for open Class A1 (food and non-food) uses, and it can therefore be occupied lawfully by a retail use in Class A1 without the requirement for any further planning permission. Below, we summarise why this provides a genuine fallback scenario where Lidl could trade from the existing building:
 - The existing building benefits from Class A1 Use.
 - The applicant, or any other retail occupier, could occupy the existing building and trade from it
 without the requirement for any planning approval.



- Only limited amendments would be required to the external elevations of the existing building. To assist the LPA, an alternative site plan has been included to demonstrate how the existing building could be adapted to suit their commercial requirements (provided at Appendix A). This is not the preferred form of development for the site, as Lidl seeks a bespoke store building which delivers wider planning benefits including improved energy efficiency and a reduced development mass. However, the alternative refurbishment approach does represent a genuine option for the applicant.
- Lidl has a proven track record of converting existing buildings to suit their trading needs, including successful trading stores at Lower Bristol Road, Bath, Chapel Street, Marlow, and Swindon Road, Cheltenham.
- 2.3.4 The above/enclosed demonstrates a genuine fallback position, which is a significant material planning consideration when considering this planning application.

2.4 The Proposed Development

2.4.1 The proposed development seeks planning permission for the following:

"Demolition of the existing Buildings and Erection of a Class A1 retail foodstore with surface level car parking, landscaping, and associated works".

- 2.4.2 The proposals are shown on the Proposed Site Layout Plan enclosed at **Appendix B** and comprise:
 - A store of 1,976 sqm (GIA), with 1,347 sqm net sales area;
 - 100 car parking spaces including 7 parent and child, 6 accessible parking bays and 2 Electric Vehicle charging bays;
 - Cycle and Motorcycle spaces will also be provided; and
 - Associated drainage and landscaping.

Site Design and Appearance

- 2.4.3 The applicant has considered a range of development options to best respond to the constraints and opportunities of the site. The store will be built in accordance with Lidl's latest specification, providing a contemporary and sustainable design.
- 2.4.4 The main façade of the store fronts onto Aberystwyth Road, creating an active and welcoming relationship between the street and the building. The proposed massing is positioned along the western edge of the site, with the car park located in front of the store. Accessible and parent-and-child spaces are placed closest to the entrance to ensure convenience and safety. Soft landscaping is incorporated around the site boundaries to reduce visual impact from the roadside and neighbouring properties, with detailed design to be developed in collaboration with a Landscape Architect.



- 2.4.5 The open-plan layout provides clear views across the car park, enhancing natural surveillance and promoting a sense of safety for both pedestrians and vehicles. The scale of the proposal meets current Lidl requirements while allowing flexibility for future changes in retail formats.
- 2.4.6 Internally, the sales area is designed to deliver a modern, attractive, and functional environment that creates a positive experience for customers and staff alike.
- 2.4.7 Modern proposed glazing is included on the main elevations to create an attractive view both into and out of the store, enhancing a modern retail experience. This will also maximise natural light within the sales area. A feature canopy along the glazed elevation will form the main visual focus when viewed from Aberystwyth Road.
- 2.4.8 The building is designed to be energy-efficient and meet Lidl's sustainability standards. Photovoltaic (PV) panels are included on the roof to provide zero-carbon energy. Two rapid electric vehicle charging points will be provided, each offering a charging capacity equivalent to approximately five to six standard fast chargers.

Access and Parking

- 2.4.9 The existing access will be reconfigured to serve the proposed Lidl store by widening the bellmouth to accommodate separate left- and right-turn exit lanes, together with a pedestrian crossing point across the bellmouth. The current arrangement provides good visibility, which will be maintained following these minor amendments.
- 2.4.10 The car park will provide 100 spaces, including 7 parent-and-child bays, 6 disabled bays, and 2 electric vehicle charging points. Disabled and parent-and-child spaces will be located close to the store entrance for convenience and safety. Cycle parking will be positioned near the entrance, with the building canopy offering shelter from the elements.

Deliveries and Servicing

- 2.4.11 Servicing will be via a dedicated loading bay on the northern elevation. 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.
- 2.4.12 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.

Lidl's Operational Model

2.4.13 Lidl is now well established in the UK with the Company operating 1,000 stores from sites and premises both within and outside town centres. Its market share continues to increase substantially, and the



Company is expanding its store network considerably. The UK operational model is based firmly on the success of Lidl's operations abroad with more than 10,800 stores trading across Europe.

- 2.4.14 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".
- 2.4.15 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 grown over time; 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 smaller 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.
- 2.4.16 The Commission, Inspectors and Secretary of State have consistently 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 up to 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.
- 2.4.17 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.
- 2.4.18 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. In the Grocer magazine's Gold Awards for 2025, Lidl were awarded Grocer of the Year.

- 2.4.19 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.
- 2.4.20 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.
- 2.4.21 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.
- 2.4.22 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.
- 2.4.23 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.
- 2.4.24 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.
- 2.4.25 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.
- 2.4.26 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.
- 2.4.27 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.

Employment

2.4.28 Staffing levels have yet to be finalised, however, based on existing Lidl's elsewhere, the proposed store is likely to provide up to 40 new jobs. 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.

2.5 Pre-application Consultation and Engagement

Pre-Application with the LPA

- 2.5.1 The application submission follows discussions with Ceredigion County Council Officers, initiated in September 2025 whereby the draft proposals were submitted to the LPA for comment. A meeting was held with planning officers on 6 November 2025, and written feedback was provided on 2 December 2025.
- 2.5.2 In summary, the LPA supports the principle of redeveloping the site for a new foodstore, given its location within Cardigan's settlement boundary and good active travel connections. However, the out-of-centre location and change in retail offer raise policy considerations. Any future application should demonstrate compliance with national and local policy by considering the development in the context of the need, sequential and impact tests. Notwithstanding this, officers acknowledge the fallback position and agree that it is a material consideration in the planning balance. The fallback position does not remove national guidance and LDP requirements but lies in the planning balance when determining the application.
- 2.5.3 Design should reflect local character, promote active frontage, and deliver high-quality landscaping in line with LDP policies. The LPA encourages sustainable design principles, bilingual signage, and measures to enhance biodiversity and ecological connectivity.
- 2.5.4 LPA advises that technical matters to address in any future planning application include:
 - Highways: Active travel priority, junction safety, swept path analysis, and provision for EV charging.
 - Amenity: Noise, lighting, and visual impact mitigation.
 - **Ecology**: Preliminary Ecological Appraisal, bat roost assessment, and nutrient impact considerations.
 - Drainage & Flood Risk: SuDS design and Flood Consequences Assessment.
 - Foul Sewer Capacity: Noting occupancy restrictions until WWTW improvements (expected by March 2027).
 - Land Contamination: Site investigation and remediation as necessary.



2.5.5 A full planning application will need to include detailed plans, Design and Access Statement, technical assessments, and supporting documents as outlined by the LPA.

Statutory Pre-Application Consultation

- 2.5.6 The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 ("the 2016 Order") sets out the statutory requirements to undertake pre-application consultation PAC) in respect of all planning applications for major development.
- 2.5.7 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.
- 2.5.8 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



3.0Planning Policy Context

3.1 Introduction

- 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 For the purposes of this site, the statutory development plan comprises:
 - Ceredigion Local Development Plan (LDP) (adopted April 2013)
 - Future Wales The National Plan 2040 (published February 2021)

3.2 Future Wales

- 3.2.1 Future Wales: The National Plan 2040 is the Welsh Government's highest tier of the development plan in Wales. Planning decisions at all levels must be made in accordance with the development plan as a whole.
- 3.2.2 Under Policy 1: Where Wales Will Grow, the Welsh Government supports sustainable growth across all parts of Wales. This is underpinned by a 'Town Centre First' approach, set out in Policy 6, which requires significant new retail and community facilities to be located within town and city centres. Developments of a 'significant' scale are broadly defined as those serving a town, city, or region-wide catchment. Planning authorities are encouraged to apply this approach to smaller-scale proposals, using a sequential test to identify the most appropriate location.
- 3.2.3 The supporting text to Policy 6 reinforces this by stating:

"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 Other relevant policies include:
- 3.2.5 Policy 2: Shaping Urban Growth and Regeneration Strategic Placemaking promotes the creation of sustainable places through the growth and regeneration of towns and cities. It encourages development that is well-integrated with green infrastructure, supports vibrant communities, and reflects placemaking principles. Planning authorities are expected to use Green Infrastructure Assessments to inform site selection and design, ensuring that development contributes positively to the character and functionality of urban areas.
- 3.2.6 **Policy 9: Resilient Ecological Networks and Green Infrastructure** which emphasises enhancing ecosystems, biodiversity, and green infrastructure through nature-based solutions.
- 3.2.7 **Policy 12: Regional Connectivity** which promotes improved connectivity in urban areas through active travel, sustainable transport, and public transport. Walking and cycling are encouraged in all new developments to reduce reliance on private vehicles.



3.3 Ceredigion Local Development Plan (LDP)

- 3.3.1 The Ceredigion Local Development Plan (LDP) was formally adopted in April 2013
- 3.3.2 **Policy S01: 'Sustainable Growth'** states that growth will be focused to deliver stronger, more sustainable communities and this will be achieved by providing opportunity for development.
- 3.3.3 **Policy S02: 'Development in Urban Service Centres (USCs)'** states USCs such as Cardigan provide sustainable locations where development will be permitted which contributes to their overall sub-regional role contributes to their regeneration strategies, where these exist; and is within the defined settlement boundary.
- 3.3.4 **Policy DM03: 'Sustainable Travel'** states that development should minimize the need to travel, provide opportunity for and promote sustainable modes of transport in Ceredigion. Parking provision for all modes of transport should be in accordance with Ceredigion SPG. A Transport Assessment should be provided at the thresholds set out in SPG.
- 3.3.5 **Policy DM04: 'Sustainable Travel Infrastructure'** states that the protection, enhancement, or complementary development of former or existing transport infrastructure with potential to provide for more sustainable travel will be a material consideration in all development.
- 3.3.6 **Policy DM05: 'Sustainable Development and Planning Gain'** states planning obligations securing financial or on site provision will, where appropriate, be sought as considered necessary.
- 3.3.7 **Policy DM06: 'High Quality Design and Placemaking'** states that development should have full regard and positively contribute to the context of its location and surroundings.
- 3.3.8 **Policy DM09: 'Design and Movement'** states that development should be designed to secure a welcoming environment which encourages appropriate through-movement.
- 3.3.9 **Policy DM10: 'Design and Landscaping'** states that all applications, other than for householder developments which will have an impact on the landscape should be supported by a landscaping scheme.
- 3.3.10 **Policy DM11: 'Designing for Climate Change'** states that the LDP will help ensure that development addresses the implications of climate change.
- 3.3.11 **Policy DM12: 'Utility Infrastructure'** states that development will be permitted provided that adequate infrastructure exists to facilitate the development.
- 3.3.12 **Policy DM13: 'Sustainable Drainage Systems'** states that development will be permitted provided that it is accompanied by a SUDS.
- 3.3.13 **Policy DM14: 'Nature Conservation and Ecological Connectivity'** states that development will be permitted where it protects and, where possible, enhances biodiversity, geodiversity, and ecological connectivity across Ceredigion.



- 3.3.14 **Policy DM15: 'Local Biodiversity Conservation'** states that development will be permitted where a stepwise approach is adopted to ensure there will be no significant negative effects to biodiversity and ecological connectivity both on-site and off-site.
- 3.3.15 **Policy DM17: 'General Landscape'** states that development will be permitted provided that it does not have a significant adverse effect on the qualities and special character of the visual, historic, geological, ecological, or cultural landscapes and seascapes of Ceredigion, the National Parks and surrounding area.
- 3.3.16 **Policy DM20: 'Protection of Trees, Hedgerows and Woodlands'** is a multi-criteria policy seeking to safeguard trees, hedgerows and woodlands.
- 3.3.17 Policy DM22: 'General Environmental Protection and Enhancement' states development will be permitted provided that it protects and enhances where possible air, soil and the water environment and safeguards water resources, it does not have a significant adverse effect on noise and light levels, a stepwise approach is adopted to ensure that it does not have a significant adverse effect on natural processes and ecosystem services, and, where possible, seeks to restore, achieve favourable condition of or enhance associated features.
- 3.3.18 **Policy LU18: 'Retail Proposals Countywide'** states that Change of use to retail, redevelopment or development of new retail or commercial land or buildings will be permitted provided that:
 - The scale is in line with that envisaged under Policies S02-S04; Consideration has been given to the likely impact of the development on existing retail provision within the Service Centre, or nearest Service Centre if the proposal is located in a Linked Settlement or other settlement. The conclusion, and the basis for this conclusion, should be presented as part of the planning application;
 - It would not cause a material oversupply of convenience, comparison or bulky goods in the relevant Service Centre or Linked Settlement. The conclusion, and the basis for this conclusion, should be presented as part of the planning application;
 - A3 uses would not cause unacceptable disturbance to the occupiers of nearby properties or adversely affect amenity; and
 - O Unless located within a town centre boundary, proposals for units of more than 800 sq. m gross or space are accompanied by a Retail Impact Assessment demonstrating how the policy requirements of National Guidance and the LDP have been met.
- 3.3.19 Policy LU19: 'Retail Proposals in Urban Service Centres' states that change of use to retail, redevelopment or development of new retail or commercial land or buildings in the uses will be permitted provided that it accords with the requirements set out in Policy LU18, it accords with Policy S01 if the proposal is in relation to an allocated site; and it does not have a significant negative individual or cumulative impact on the vitality and viability of the existing town centre.
- 3.3.20 **Policy LU32: 'Development and the Waste Hierarchy'** states that development proposals will be required to demonstrate how waste will be minimised and managed in accordance with the waste hierarchy.



3.4 Other Material Considerations

Planning Policy Wales Edition 12 (February 2024)

- 3.4.1 PPW 12 sets out the land use planning policies of the Welsh Government and is supported by a series of Technical Advice Notes (TANs). In accordance with the Well-Being of Future Generations (Wales) Act 2015, the primary objective of PPW, as set out at Paragraph 1.2, is "to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales".
- 3.4.2 Key sections relevant to the proposals include:
- 3.4.3 **Previously Developed Land** PPW 12 indicates that previously developed (also referred to as brownfield) land should, wherever possible, be used in preference to greenfield sites where it is suitable for development (para 3.55) and one of the national sustainable placemaking outcomes involves prioritising the use of previously developed land and existing buildings.
- 3.4.4 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 Wellbeing 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".
- 3.4.5 **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 or qualitative.
- 3.4.6 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.
- 3.4.7 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.



- 3.4.8 **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".
- 3.4.9 **Economy & Jobs** Section 5 of PPW 12 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 longterm 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".
- 3.4.10 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".
- 3.4.11 Accessibility PPW 12 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".
- 3.4.12 **Green Infrastructure (GI)** PPW 12 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.

Supplementary Planning Guidance

- 3.4.13 Relevant guidance can be found in Supplementary Planning Guidance; of particular relevance is the following:
 - Ceredigion County Council Parking Standards: Identifies how the CSS Wales Wales Parking Standards 2008 will be applied across Ceredigion. This guidance supplements policy DM03 'Sustainable Travel' of the LDP.

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- Built Environment and Design SPG.
- Transport Assessment SPG.
- Community and the Welsh Language SPG.

3.5 Emerging LDP

- 3.5.1 Ceredigion County Council is currently preparing the Replacement Ceredigion Local Development Plan (LDP2). Once adopted, the LDP2 will supersede the currently adopted LDP1.
- 3.5.2 The most recent consultation on LDP2 was the Preferred Strategy, undertaken between June and September 2019. This document represents the first formal stage in preparing the new Local Development Plan.
- 3.5.3 The Preferred Strategy identifies Urban Service Centres as the County's principal shopping destinations and confirms that Cardigan is one of these centres, serving a wide area beyond the County boundary. It also states that large-scale retail development should be directed to these defined Urban Service Centres.
- 3.5.4 However, given the early stage of LDP2 preparation, only very limited weight can be afforded to this document in determining planning applications.



	СТ		

Evaluation of Compliance with Retail Policies



4.0 Evaluation of Compliance with Retail Policies

4.1 Introduction

4.1.1 The lawful fallback position provides a strong material consideration that supports the principle of retail use at this location. However, to satisfy local planning policy, a proportionate assessment of retail policy tests is provided below.

4.2 Retail Need and Impact Considerations

- 4.2.1 Policy 6 of Future Wales principally relates to significant new commercial, retail, education, health, leisure and public service facilities. FW states the policy relates to new developments and does not apply to extensions to existing facilities. The policy is silent on sites already benefitting from open retail planning permission.
- 4.2.2 Policy LU18 of the LDP states development should not cause a material oversupply of convenience, comparison or bulky goods in the Service Centre and that unless located within a town centre boundary, proposals for units of more than 800sqm gross floorspace should demonstrate how the policy requirements of National Guidance and the LDP have been met.
- 4.2.3 In addressing the relevant retail policy matters relating to need and impact it is important to recall that as outlined in Section 2.0 above, the existing unit benefits from a lawful development certificate (LDC) issued under s192 of the Act (and so relates to proposed use). The LDC confirms the GIA of the store to be 2,523sqm gross. The LDC allows for unit to be delivered for food or non-food retail or any combination of both.
- 4.2.4 Whether a factor is material in the determination of a planning application is a matter of judgment for the LPA, unless there is a legal obligation or the factor is obviously material. This principle is supported by case law¹.
- 4.2.5 The fact that the existing site benefits from open Class A1 planning permission as confirmed by way of a lawful development certificate is both obviously and highly material. It is obvious that the existing unit could be reoccupied by another retailer, be it a non-food or food operator.
- 4.2.6 The enclosed drawing ref: 2806 F1400 provided at **Appendix A** shows how the existing unit could be delivered for a Lidl development; this demonstrates that this 'fall-back position' is both realistic and may be implemented and is not merely theoretical. While the fallback option is realistic, it is not preferred, nor is it considered beneficial when assessed other material planning considerations.
- 4.2.7 Case law confirms that if the fall-back use would have similar or greater impacts than the proposed development, then it may justify granting permission. The decision-maker must consider the comparative impacts of the fall-back use versus the proposed development.

¹ Samuel Smith Old Brewery v North Yorkshire County Council [2020] UKSC 3 CARNEYSWEENEY.CO.UK



4.2.8 The existing unit can be re-occupied by any retailer without the need for planning permission, pursuant to the LDC. The below table provides an analysis of the benchmark trading position of the existing unit should the existing operator vacate and an alternative operator occupy and trade from the existing unit. This analysis also includes an assessment of the Lidl trading from the existing unit. It can be seen that in the below alternative trading scenarios the unit turnover is **higher** than the proposed new Lidl foodstore.

Table 1.0: Benchmark Turnover assessment, Existing Unit

	Gross Internal Area (sqm)	Total Net Sales (sqm)	Net sales area (sqm)	Trading density (£/sqm)	Turnover 2025 (£m)	Turnover 2031 (£m)
	[1]	[2]	[3]	[4]	[5]	[6]
Existing unit (trading as B&M Bargains)	2,523	2,018	2,018	4,037	8.1	9.5
Alternative operator (Next)	·	,	2,018	8,053	16.3	19.0
Alternative operator (Sports Direct)			2,018	6,726	13.6	15.8
Alternative operator (DFS Furniture)			2,018	5,451	11.0	12.8
Average Bulky (non-food)			2,018	4,533	9.1	10.7
Average Non-Bulky (non- food)			2,018	5,582	11.3	13.1
Average Food operator*	2,523	2,018				
convenience			1,615	11,987	19.4	19.4
comparison			404	7,334	3.0	3.5
Total						22.8
Existing Unit (Lidl) - Fallback position	2,523	1,387				
convenience			1,110	8,585	9.5	9.5
comparison			277	4,620	1.3	1.5
Total						11.0
Proposed New Lidl Foodstore	1,976	1,347				
convenience			1,078	8,585	9.3	9.3
comparison			269	4,620	1.2	1.5
Total						10.7
Difference to fallback						£-0.3m

Notes

^[1] Gross area of store as confirmed on LDC

^[2] assumed 80% of gross

^{[3] = [2]} or 80/20 split

^[4] s/d sourced from Mintel Rankings or GlobalData indexed to 2023 price base

^{[5] = [2]*[3]/1,000,000}

^[6] turnover rolled forward to 2030 based on assumed f/s efficiency increase (0% conv, 2.6% comp) (EXRPBN 22 Fig 4a (Mar 2025))



^{*}Avge s/d of Sainsburys, Morrisons, Asda & Coop

- 4.2.9 The alternative trading occupants and the Lidl fall-back scenario all involve trading from the existing 2,523 sqm gross unit, whereas the proposed Lidl store is just 1,976 sqm gross (1,347sqm net). It shows the other trading scenarios including Lidl trading from the existing unit (i.e. the fallback) would result in a higher turnover.
- 4.2.10 In practical terms, we consider there is no requirement to assess 'need' or capacity given the fallback position and the reduction in floorspace. Indeed, the application does not seek to justify any additional out-of-centre floorspace, the opposite is true; the proposed development will lead to a reduction in out-of-centre retail floorspace. In this sense the development will serve to *increase* floorspace capacity (at least theoretically), not reduce it. The fact that the fallback position is a genuine fallback, whether the existing unit is occupied by Lidl or another operator, and that the fallback position will deliver a higher turnover than the current proposals (in all of the above reoccupation scenarios), further supports the case that the proposed development is acceptable in the context of Policy LU18. This is highly material to the determination of the application. Notwithstanding Lidl could deliver and trade from a larger store from the existing unit, it is seeking to invest in Cardigan by way of delivering a smaller, purpose built, modern store which is more energy efficient with reduced massing, will better safeguard surrounding residential amenity and deliver a better customer experience. This also accords with the LDP's wider design policies and the Welsh Government's wider placemaking objectives.
- 4.2.11 As set out in Table 1.0 above the turnover difference between the existing unit (trading as B&M) and the proposed new foodstore is just £1.2m.
- 4.2.12 In respect of trading effects or 'impact' of the proposals, the below table provides an analysis of the current trading position at Cardigan's principal food retailers.

Table 1.1 Benchmark assessment - Existing Cardigan main foodstores 2026, 2031

	Gross Internal Area	Convenience Net Sales	Convenience Benchmark Sales Density	Benchmark Turnover	Survey Derived Turnover	Survey Derived Turnover	Over/under Trading +/- 2026
	(sqm)	(sqm)	(£/sqm)	(£m)	2026 (£m)	2031 (£m)	(£m)
	[1]	[2]	[3]	[4]	[5]	[6]	[7]
Tesco Superstore, Aberystwyth Road	3,063	1.960	16,226	31.8	33.3	33.7	1.5
Aldi, Aberystwyth	3,003	1,500	10,220	31.6	33.3	33.7	1.5
Road	1,230	787	11,748	9.2	32.6	33.0	23.4

Notes

- [1] IGD and application info
- [2] estimated 80% of sales area (sales 80% of gross, est.)
- [3] GlobalData Mar 2025 (at 2023 prices)
- [4] =[2]*[3]/1,000,000
- [5] [6] See Table 4 and 5 Appendix 5 SWWRRS index linked to 2023 price base
- [7] = [5] [4]



- 4.2.13 For main food retail Cardigan is predominantly served by the out of centre Tesco and Aldi stores, both on Aberystwyth Road. It can be seen from the above analysis that based on the findings of the South West Wales Regional Retail Study² (SWWRRS) both stores are 'overtrading'; that is, trading in excess of the benchmark turnover, at both 2026 and 2031 (the design year of the proposed LidI store). Indeed, we note the existing Aldi is trading significantly above its benchmark performance and is due to relocate to a larger store at Bath House Farm pursuant to its recent planning permission³. Any trading effect of the proposed new Lidl will be felt by these main foodstores both of which are: demonstrably trading strongly; not protected in policy terms; and well quipped to absorb the trading effect. The store will improve local choice and competition to the local food retail market.
- 4.2.14 It should also be noted that the change of operator at the application site from a variety retailer (B&M) to a food retailer reduces the potential 'trading overlap' with various non-food town centre-based operators.
- 4.2.15 Town centre trading impact associated with the proposal is anticipated to be less than that which could occur under the fallback position. We also consider the impact of the proposed store on the town centre would be positive when considered against the fall-back scenario (Lidl or any other retailer occupying the larger existing unit). Moreover, we consider overall the store will have a positive trading effect on the local retail environment by reducing out of centre floorspace, reducing variety non-food retail and improving local food retail choice and competition, to the benefit of local customers.
- 4.2.16 In light of the above considerations the proposed development is considered acceptable, indeed beneficial, in the context of Policy LU18.

4.3 **Sequential Assessment**

- 4.3.1 The general requirements of the sequential approach to site selection are set out at paragraphs 4.3.18 to 4.3.24 of PPW 12. In summary, the sequential approach requires that all potential suitable and available town centre options, and then edge-of-centre options, are thoroughly assessed before out-of-centre sites are considered for key town centre uses. The approach requires pragmatism and flexibility from local planning authorities, developers and retailers alike. The onus of proof that more central sites have been thoroughly assessed rests with the developer.
- 4.3.2 Key considerations in carrying out the sequential test on each potential site include:
 - The likelihood of the site becoming available within a reasonable period of time;
 - Suitability of the site for the proposed development; and
 - Viability for the proposed use.

² Updated as appropriate

³ Ref: A250058



4.3.3 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 judgments in regard to the application of the sequential test, particularly in regard to the need for disaggregation.

4.4 Application of the Sequential Approach

- 4.4.1 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. It is important that the sequential approach is applied in a policy and legally compliant manner. Several appeals and Court cases have helped shape the 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."
- 4.4.2 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 Dundee City Council⁴. 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).
- 4.4.3 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, 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);
- 4.4.4 Another English appeal decision is relevant that of a mixed-use scheme informally referred to as Rushden Lakes5, which was an appeal recovered and allowed by the Secretary of State. As well as declaring the Dundee judgment 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.
- 4.4.5 Similarly, neither PPW nor 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

⁴ Tesco Stores Limited v Dundee City Council (Tesco Stores Ltd v. Dundee City Council [2012] UKSC13

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



required of applicants. The Aldergate Properties v Mansfield DC High Court Judgment₆, 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.

- 4.4.6 Furthermore, the appellant's own commercial objectives are relevant to the question of suitability, even where these are site-specific (Telford Forge 7 Appeal, para 16).
- 4.4.7 In the Scotch Corner appeals 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.
- 4.4.8 Against this backdrop of case law and recovered appeal decisions, PPW was revised in November 2016 (in the form of Edition 9 at that time). Edition 8 had previously stated, at paragraph 10.3.5: "To maximise the opportunities for new development in centres, developers and retailers will need to be more flexible and innovative about the format, design and scale of proposed development and the amount of car parking, tailoring these to fit the local circumstances. Rather than propose developments with a mixture of large-scale retail and/or leisure uses and a large amount of car parking which can only be accommodated at single site out-of-centre or even out-of-town locations, developers are expected to demonstrate why they could not develop elements of the larger scheme on a site, or a number of sites, in more central locations with less car parking."
- 4.4.9 This wording, which required disaggregation of elements of the scheme onto multiple sites, was removed from PPW. Policy in Wales, therefore, does not require demonstration of a disaggregated approach (consistent with England and recent case law). It is clear, therefore, that disaggregation is not a policy requirement.
- 4.4.10 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).

4.5 Site Search Parameters

Flexibility

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

⁷ Telford Forge Retail Park (Appeal Ref. APP/C3240/A/12/2172756)

⁸ APP/V273/V/15/3132873 & APP/V2723/V/16/3143678 – Land at West of the A618 Barrack Bank, Scotch



- 4.5.2 The restriction that this places on the ability of Lidl to be 'flexible' in its format is relevant to the sequential approach. This has been accepted by the Secretary of State and Inspectors in appeal decisions relating to Lidl foodstores, and by very many LPAs in their consideration of Lidl's applications.
- 4.5.3 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.
- 4.5.4 Subsequent decisions have reinforced these principles, including, in November 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, Lidl's business model "is not able to function without surface-level car parking". Having regard to the requirement to demonstrate flexibility, and the evidence provided by Lidl, the Inspector concluded that the alternative store "would be unsuitable for use by Lidl as a LAD foodstore, particularly as there appears to me to be limited scope or space to make significant changes to the layout or size of the building".
- 4.5.5 For Lidl to operate its business model, the physical requirements, when applying flexibility to meet the needs of the proposed development, are considered to be:
 - a minimum site size of circa 0.6ha
 - a minimum floorspace of c.1,672 sqm on a single level. There is no prospect for disaggregation in this instance.
 - approximately 80 adjacent surface-level parking spaces.
 - 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 can offer adjacent surface-level car parking, so that customers can easily transfer food to their vehicles, and
 - Provision of a dedicated service area to the rear of the store, including the ability to accommodate
 HGVs (Heavy Goods Vehicles). All the above are key operational and locational requirements.

Definition of Availability

4.5.6 Any sequential site needs to be available or expected to be available within a reasonable period. If there is any uncertainty on a site coming forward for development, for example, there are practical/feasibility/viability issues to resolve or investment/occupier interest or funding is still to be



secured, then a site cannot reasonably be considered to be available. If a potential alternative site does not satisfy the availability test, it is not sequentially preferable.

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

4.6 Sequential Site Findings

- 4.6.1 The sequential search assesses potentially suitable and available sites within or on the edge of Cardigan Town.
- 4.6.2 The following sites have been identified as part of our sequential assessment:
 - Pwllhai Site;
 - Greenfield Square Car Park;
 - Quay Street Car Park;
 - Williams Terrace Car Park;
 - Vacant units within Cardigan town centre; and
 - ALDI Stores Site, Aberystwyth Road and New Mill Road



Pwllhai Site (LDP Allocation – M0201)

- 4.6.3 The Pwllhai site is allocated in the adopted LDP for mixed-use development, including employment, transport, and retail, and comprises approximately 0.75 hectares. Paragraph 12.16 of the LDP notes that the retail contribution from this site will be limited.
- 4.6.4 Despite being a long-standing allocation, the site has not come forward for development. A planning application was submitted by Eatonfield Holdings Limited in January 2005 (ref. A050010), but no decision was issued, and no appeal against non-determination was lodged. The site also falls within an area identified as being at high risk of flooding as set out in the NRW Flood Maps for Planning.
- 4.6.5 Overall, the Pwllhai site does not represent an available or suitable alternative for delivering a single large-format retail unit. This conclusion aligns with the position taken by Ceredigion County Council in determining a recent retail application in Cardigan in August 2025 (ref. A250058).

Greenfield Square Car Park

- 4.6.6 Greenfield Street Car Park is located in the eastern part of the defined town centre and currently operates as a well-used surface-level car park serving shoppers and visitors. It sits behind the primary shopping area, providing important parking capacity for the town centre.
- 4.6.7 The loss of this car parking without suitable replacement would have adverse implications for the wider vitality and viability of the town centre. Opportunities to provide replacement parking as part of any redevelopment are severely constrained by the site's limited size (less than 0.3 hectares). In fact, the site is too small to accommodate the proposed development, even with a flexible interpretation of requirements. The site also falls within an area identified as being at high risk of flooding. Furthermore, given its current use, the site's availability is uncertain, and there is no evidence that it has been marketed as available.
- 4.6.8 On this basis, the site can be discounted as neither suitable nor available for the proposed development.

Quay Street Car Park

- 4.6.9 Quay Street Car Park at the edge of the town centre, immediately north of the Afon Teifi. The site is currently used as a surface-level car park for visitors to the town centre. As with other town centre car parks (such as Greenfield Square), the loss of car parking without adequate replacement being provided will have adverse implications on the long-term vitality and viability of the town centre.
- 4.6.10 The existing car park extends to approximately 0.7 hectares and does not provide a uniform shape. It also falls within an area identified as being at high risk of flooding. We are not aware of the car park being marketed as available.
- 4.6.11 On this basis, the site can be discounted as neither suitable nor available for the proposed development.

Williams Terrace Car Park



- 4.6.12 This car park, located just beyond the eastern edge of the town centre boundary, extends to approximately0.45 hectares. It is well used by visitors to the town centre, including those accessing the adjacent CardiganSwimming Pool and Fitness Centre.
- 4.6.13 The loss of this car parking without adequate replacement would have negative consequences for the vitality and viability of the town centre. Due to its limited size, redevelopment for the proposed use would leave insufficient residual space to accommodate replacement parking alongside the new development. At approximately 0.45 hectares, the site is too small to accommodate the Lidl store even when applying flexibility. The site's availability is also uncertain given its current active use, and there is no evidence that it has been marketed for redevelopment.
- 4.6.14 In conclusion, this site cannot be considered available or suitable to accommodate the proposed development.

Vacant units within Cardigan town centre

- 4.6.15 The Experian Goad Plan dated December 2024 (provided at **Appendix C**) confirms that there are 25 vacant units within Cardigan Town Centre. However, none of these units are of a size capable of accommodating a Lidl store and can therefore be discounted from the assessment. Furthermore, the recently approved retail application (ref. A250058) for land at Bath Road undertook a comprehensive sequential site search in January 2025. This confirmed that there are no suitable sites within the town centre that could accommodate a Limited Assortment Discount foodstore. The LPA accepted this conclusion as part of the approval, as set out in the Officer's Report dated August 2025.
- 4.6.16 In conclusion, there are no vacant sites that can be considered available or suitable to accommodate the proposed development.

Aldi Stores Site, Aberystwyth Road and New Mill Road

- 4.6.17 The existing out-of-centre Aldi store on Aberystwyth Road remains occupied and trading, although it is understood Aldi intends to relocate to an edge-of-centre site on Bath House Road. The timescales for this relocation are currently unknown, and Aldi continues to operate from its existing premises; therefore, it can reasonably be assumed that the site is not available. Furthermore, Aldi retains a commercial interest in controlling the future use of the site, making disposal to a direct competitor highly unlikely. This position was confirmed in Aldi's Planning and Retail Statement for application ref. ref. A250058 and noted in the Officer's Report to Committee (page 103), where it was accepted "It can be reasonably assumed that Aldi will not dispose of their current premises to a market competitor and therefore, subject to consents, its current 1,230 sqm of retail floorspace may be lost and partially offset any short-term increase in overall floorspace within Cardigan."
- 4.6.18 In conclusion, this site cannot be considered available or suitable to accommodate the proposed development.

Sequential Assessment Summary



- 4.6.19 The sequential assessment confirms that no sites exist which are available, suitable, and viable as sequentially preferable alternatives for the proposed development within the town centre or edge-of-centre, even when allowing for flexibility in format and scale.
- 4.6.20 Furthermore, the application site is currently in retail use. Identifying an alternative out-of-centre site would result in the creation of two retail units outside the town centre, the existing unit and the proposed alternative. For this reason, any other out-of-centre sites should be discounted.
- 4.6.21 Accordingly, the proposal is considered to fully comply with local and national planning policy and guidance, as well as established judicial and appeal decisions relating to the sequential approach.



ECTION 5			

Other Planning Considerations



5.0 Other Planning Considerations

5.1 Introduction

- 5.1.1 The above section of this report addresses matters related to retail policy, concluding that the revised scheme complies with national and local policy in this regard. This section addresses other non-retail principal planning policy matters relating to the proposed development, namely:
 - Principle of Development;
 - Socio-Economic Benefits:
 - Design, Appearance and Landscaping;
 - Highways and Parking;
 - Noise Impact;
 - Flood Risk and Drainage;
 - Ecology and Biodiversity;
 - Ground Conditions and;
 - Sustainability.

5.2 Principle of Development

- 5.2.1 The site comprises brownfield land within the defined settlement boundary of Cardigan and occupies a highly accessible location. It is currently occupied by B&M Bargains, operating as a variety retail unit (including some food sales) with a substantial outdoor garden centre. The site benefits from a Lawful Development Certificate (LDC) confirming that unrestricted Class A1 retail use (including food) for the existing 2,523 sqm (gross) unit is lawful.
- 5.2.2 This provides a valid fallback position, which is a material consideration in determining any planning application for a new store. Furthermore, the proposed development represents a reduction of approximately 21% in retail floorspace compared to the existing lawful position (excluding the garden centre trading area). As such, the proposal would result in a significant decrease in retail floorspace at the site. Subject to satisfying the retail tests relating to the sequential approach, impact, and need addressed in preceding sections, the proposed use raises no wider land use policy concerns.

5.3 Socio-Economic Benefits

5.3.1 The proposed Lidl store will deliver substantial economic and social value to Wales, in line with Lidl's proven impact across the region and nationally. In 2024, Lidl contributed £808.2 million in Gross Value Added (GVA) to the Welsh economy. The business supports 14,928 jobs in Wales, comprising 1,350 direct roles and 13,578 indirect positions, and generated £57.5 million in tax revenues for public services in 2024.



Lidl also invests in local communities, donating £160,485 to Welsh causes, providing over one million meals to tackle food insecurity, and delivering healthy eating education to 11,995 children through its Lidl Foodies programme. Environmental benefits include avoiding over 1,600 tonnes of CO2 emissions through food redistribution and efficiency measures.



Figure 5.1 Extract from Lidl Effect Regional Report (Appendix D)

5.3.2 At a national level, in 2024, Lidl generated £14.5 billion in GVA across the UK (0.56% of UK GVA), supported 281,813 jobs, paid over £1 billion in taxes, and invested £474 million in new stores and distribution centres. Around two-thirds of Lidl's products are sourced from British suppliers and invested £5.8 billion in British food and farming, reinforcing domestic agriculture and manufacturing. In addition, Lidl supported 281,813 jobs and paid £392 million in wages above the Living Wage benchmark, demonstrating its commitment to fair employment. Lidl also donated 18.5 million meals, alleviating an estimated £79.5 million in NHS costs linked to malnutrition and obesity, and raised £10 million for the NSPCC, funding Childline counselling and safeguarding services.





Figure 5.2 Extract from Lidl Effect Report (Appendix D)

- 5.3.3 These figures demonstrate that the proposed store will not only create local employment and strengthen supply chains but also contribute meaningfully to public revenues, community wellbeing, and sustainable development.
- 5.3.4 A full copy the 'Lidl Effect' Socio-Economic Impact Report is provided in Appendix D.
- 5.3.5 In summary, the proposed Limited Assortment Discount (LAD) store will deliver a range of benefits as an employment-generating use. During the construction phase, the scheme will create jobs and support local economic activity, as workers spend earnings within the community. At the operational stage, the foodstore will provide approximately 40 full-time equivalent (FTE) roles, ranging from store assistants and cleaners to managerial positions. These jobs will be accessible by foot or bicycle for the surrounding population. Lidl currently offers a retail industry-leading wage of £12.40 per hour, rising to £13.35 per hour for long service.

5.4 Design, Appearance and Landscaping

- 5.4.1 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.
- 5.4.2 The proposed development will be built in accordance with Lidl's contemporary specification, creating a bright, spacious sales area.
- 5.4.3 The proposed elevations have been designed to provide activity and identity to the public frontages that respond to the geometry and site topography, whilst maintaining adequate clearances and separation and remain in keeping with the surrounding built environment. The elevations maintain the Lidl corporate image and palette of materials.



- 5.4.4 The landscape strategy for the site retains existing trees and vegetation along the site boundaries, where possible. Areas of existing shrub planting, which partially contains some invasive small-leaved cotoneaster, will be removed. Areas of existing amenity grassland would also be overseeded to create species-rich grassland areas for biodiversity enhancement.
- 5.4.5 There is an opportunity to plant a tree and a native hedgerow in the southeast of the site. Native infill planting is also proposed along the site boundaries, where there are gaps in existing vegetation to enhance wildlife corridors and connectivity.
- 5.4.6 In summary, the proposed development will provide a contemporary shopping environment that complements and enhances the site's immediate surroundings. It is considered that the proposed development fully complies with local plan policies, including Policies DM06, DM09 and DM10.

5.5 Highways and Parking

- 5.5.1 The application is supported by a Transport Assessment and Travel Plan prepared by SCP. The Transport Assessment concludes:
 - It is considered 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 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 customers it attracts from existing pass-by traffic.
 - In terms of delivery, swept path analysis drawings provided demonstrate that a 16.5m articulated HGV can safely enter and exit the car park in forward gear and prove that the store can be serviced while fully operational;
 - The level of car parking is sufficient to meet the operational needs of Lidl throughout the year and is in line with current car parking standards; and
 - The proposed means of access into the application site has been tested using Junctions 11 and
 the results have confirmed 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.
- 5.5.2 The assessment demonstrates that the development complies with local, regional, and national transport policy objectives for accessibility, sustainability, and highway safety, including Policies DM03 and DM04 of the LDP. Accordingly, there are no highway-related reasons to preclude the granting of planning permission.

5.6 Noise Impact

5.6.1 The application is supported by a Noise Assessment prepared by Inacoustic. The Noise Assessment evaluates potential noise impacts from the proposed redevelopment of the Lidl store, including demolition, construction, and operational phases.



- 5.6.2 Baseline measurements were undertaken at representative locations near the site to establish existing ambient noise conditions.
- 5.6.3 The report concludes that during the construction phase, predicted noise levels during demolition and building works are within acceptable limits when standard best practice measures are applied. For the operational phase, the assessment modelled noise from plant and equipment (e.g., refrigeration units, HVAC) and delivery activities. The report concludes that the predicted levels at the nearest sensitive receptors comply with BS4142:2014+A1:2019 guidance and local authority criteria.
- 5.6.4 The report further advises that additional vehicle movements associated with the store are not expected to cause a significant increase in road traffic noise.
- 5.6.5 The Noise Assessment recommends the following:
 - Implementation of a Construction Environmental Management Plan (CEMP) with noise control measures (e.g., restricted working hours, use of quieter plant, acoustic screening where necessary).
 - Ensure plant and equipment meet specified sound power limits and are maintained in good condition.
 - Delivery times to be managed to avoid early morning or late-night disturbance.
 - Consider acoustic fencing or barriers if required during construction.
- 5.6.6 With recommended mitigation secured by condition, the development is considered acceptable in terms of noise and amenity and compliant with national and local plan policy and specifically LDP Policy DM06 (Design and Amenity).

5.7 Flood Risk and Drainage

- 5.7.1 The site lies within Flood Zone 1 (NRW Flood Map for Planning), with a very low risk of flooding from all sources, including fluvial, tidal, surface water, sewer, groundwater, and artificial sources. The application is supported by the FCA and Drainage Strategy prepared by Waterco.
- 5.7.2 The FCA and Drainage Strategy concludes that the proposed Lidl development will increase impermeable area; therefore, flow control and attenuation will be implemented to comply with Welsh Government Statutory Standards for SuDS. Surface water will discharge to the watercourse 25m east of the site at a restricted greenfield runoff rate of 3.3 l/s, via a pumped system.
- 5.7.3 Foul water will connect to the public combined sewer in Aberystwyth Road via gravity, as agreed with DCWW. No increase in foul flows compared to the existing B&M store.
- 5.7.4 The FCA and Drainage Strategy concludes that the proposed development accords with PPW12, TAN15, and Ceredigion LDP Policies DM11 (Designing for Climate Change) and DM13 (Sustainable Drainage Systems). The design also maximises amenity and biodiversity benefits and includes a maintenance regime to ensure long-term functionality.



5.8 Ecology and Biodiversity

5.8.1 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.

Designated Sites

5.8.2 Five statutory sites (including Afon Teifi SAC/SSSI) and one non-statutory site (Teifi Marshes Wildlife Trust Reserve) lie within 2km. No direct impacts are anticipated due to the urban nature of the site and proposed mitigation.

Habitats

5.8.3 The site is dominated by sealed surfaces and buildings (No Value). Modified grassland, scrub, and hedgerows are of Low Value, with a line of trees of Local Value.

Protected Species:

- 5.8.4 Great Crested Newt: No suitable breeding habitat; site assessed as **No Value**.
- 5.8.5 Reptiles, Bats, Birds, Badger, Hedgehog: Limited habitat; site assessed as Low Value.

Invasive Species

5.8.6 Small-leaved cotoneaster (Cotoneaster microphyllus) is present and must be removed.

Priority Habitats:

5.8.7 None onsite; site lies within a B-Line corridor for pollinators.

Recommendations

CARNEYSWEENEY.CO.UK

- 5.8.8 The PEA sets out a number of recommendations as follows:
 - Prepare and implement a Construction Ecological Management Plan (CEcMP).
 - Remove invasive cotoneaster via licensed contractor.
 - Avoid clearance during bird nesting season (March–August) unless checked by a Suitably Qualified Ecologist.
 - Wildlife-sensitive lighting and daytime-only construction to reduce disturbance to bats and birds.
 - Incorporate bat and bird boxes and hedgehog access gaps (13cm x 13cm) in boundary treatments.
 - Landscape planting to use native and pollinator-friendly species, including blackthorn for brown hairstreak butterfly.

BIRMINGHAM I CARDIFF I EXETER I LONDON

5.8.9 A Green Infrastructure Statement has been prepared by Tir Collective. The proposed green infrastructure strategy has considered the existing green infrastructure features within and beyond the site boundary and retained those of value, as recommended by the Stepwise approach. Proposed green infrastructure features would increase the biodiversity, species diversity, and habitat structure on the site whilst



contributing to the multi-functionality of the green infrastructure elements. The assessment concludes that although the development primarily serves a commercial function with limited scope for amenity provision, the proposals would deliver a modest net ecological enhancement through targeted planting and habitat features. Overall, the scheme will not result in significant adverse ecological effects and will provide a visually improved, biodiverse, and environmentally responsible redevelopment of a previously developed site.

5.8.10 The PEA and Green Infrastructure Statement demonstrate that the proposals are compliant with national and local biodiversity policy and legislation, including PPW 12 Chapter 6 and Ceredigion LDP Policy DM14, DM15, DM17, DM20 and DM22.

5.9 Ground Conditions

- 5.9.1 A Phase 2 Ground Investigation was undertaken by Remada Ltd in December 2025 This followed the preparation of the Phase 1 ground investigation in 2022.
- 5.9.2 Overall, the investigation concludes that the site is suitable for the proposed development subject to ground improvement, radon protection, and appropriate waste management during construction.

5.10 Sustainability

- 5.10.1 Lidl stores are designed to be as environmentally sound as possible. For example, store heating systems are highly efficient condensing boilers which recover waste heat from the combustion process. All heating is regulated by sensors. The canopy of the store is also designed to minimise thermal gain within the building.
- 5.10.2 A system of 180 12 kWp Photovoltaic panels consisting of 384 PV modules are proposed on the roof of the store to generate on-site renewable energy for use in the store.
- 5.10.3 The lighting in the storage and warehouse areas is controlled by movement sensors so that lights only turn on when the space is in use. The sales area uses full lighting during trading hours, but cuts back to one-third lighting before and after trading hours to allow for restocking 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 ensure that lights do not remain on later than 2 hours after the store closes.
- 5.10.4 Sustainable techniques are used during the construction and operation of the development wherever practicable.



SECTION 6			

Summary and Conclusion



6.0 Summary and Conclusions

6.1 Summary

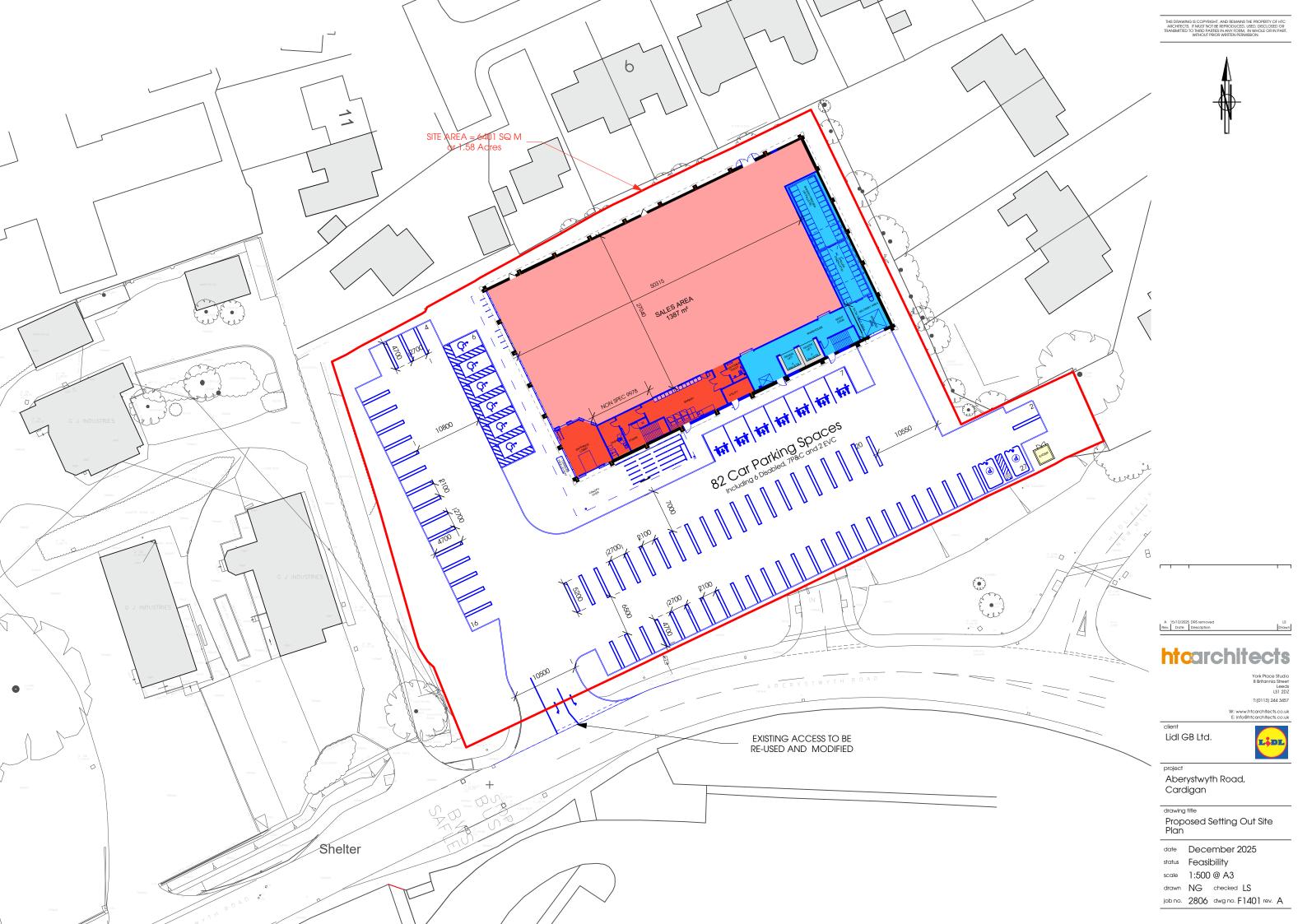
- 6.1.1 This Planning and Retail Statement has been prepared by CarneySweeney on behalf of Lidl Great Britain Limited to accompany a planning application for a new Lidl foodstore on land at Aberystwyth Road, Cardigan.
- 6.1.2 The statement assesses the proposals against the relevant national and local planning policy framework and material considerations. The key findings are:
 - The site comprises previously developed land within the defined settlement boundary of Cardigan
 in line with LDP Policy S02 and is highly accessible by sustainable modes of transport in line with
 Policies DM03 and DM04.
 - The proposal seeks to redevelop an existing retail site, reducing overall retail floorspace compared to the lawful fallback position, which is an obvious material consideration.
 - The development will deliver a modern, energy-efficient foodstore, incorporating sustainability
 measures such as photovoltaic panels, permeable paving, and biodiversity enhancements in
 accridance with LDP Policy DM13.
 - The scheme will provide significant economic benefits, including approximately 40 full-time equivalent jobs and investment in local infrastructure.
 - The impact of the proposed store on the town centre would be positive when considered against the fall-back scenario (Lidl or any other retailer occupying the larger existing unit). Moreover, it is considered that the overall the store will have a positive trading effect on the local retail environment by reducing out-of-centre variety non-food retail and improving local food retail choice and competition, to the benefit of local customers.
 - Technical assessments confirm the proposal is acceptable in terms of design, highways, noise, flood risk, drainage, ecology, and ground conditions, subject to standard mitigation measures.

6.2 Conclusions

6.2.1 The proposed development represents a sustainable, policy-compliant scheme that will regenerate a brownfield site, improve the retail offer in Cardigan, and deliver economic and environmental benefits without causing harm to town centre vitality or other material considerations. In light of the above, the relevant planning considerations weigh firmly in favour of planning permission being granted.

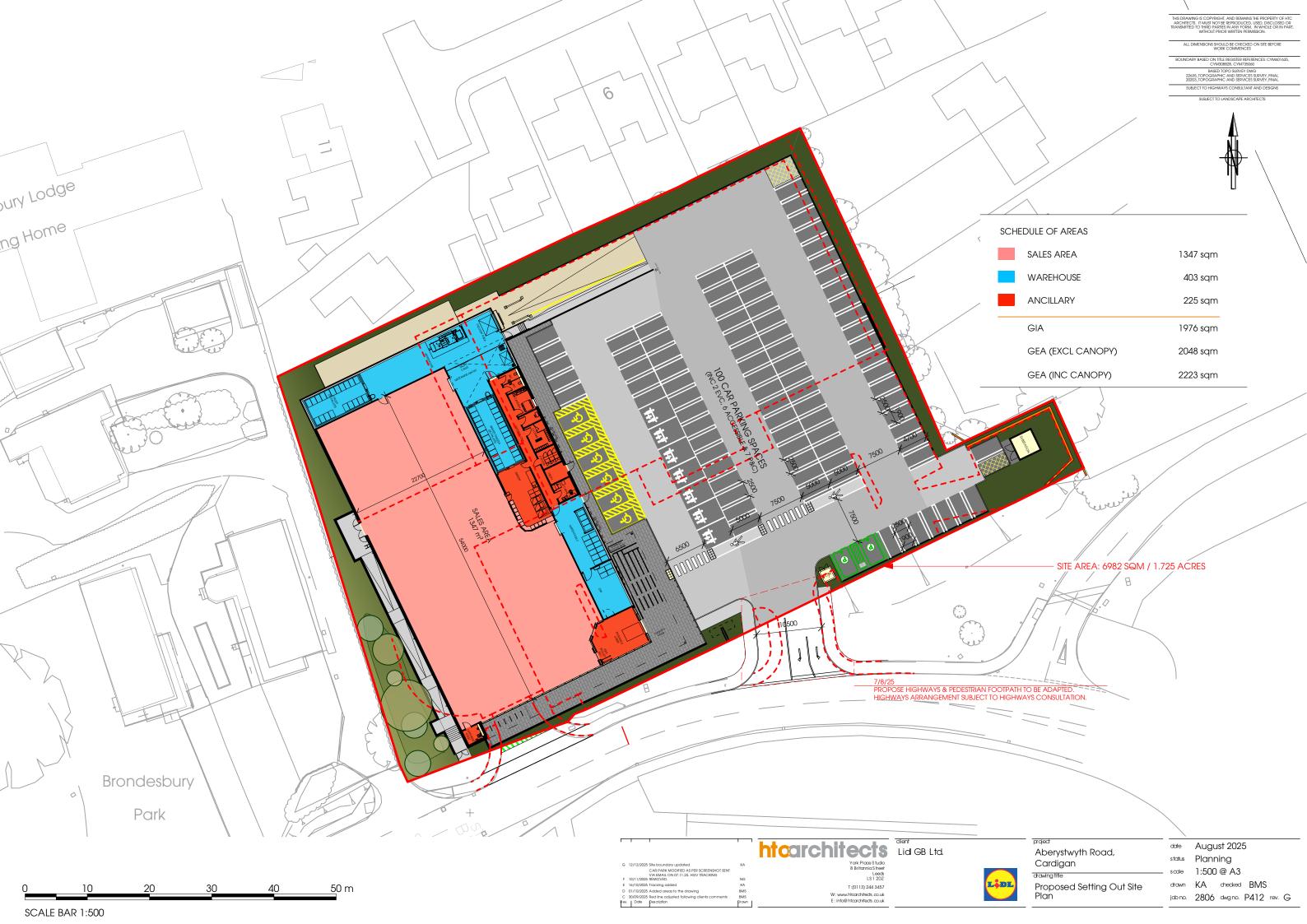






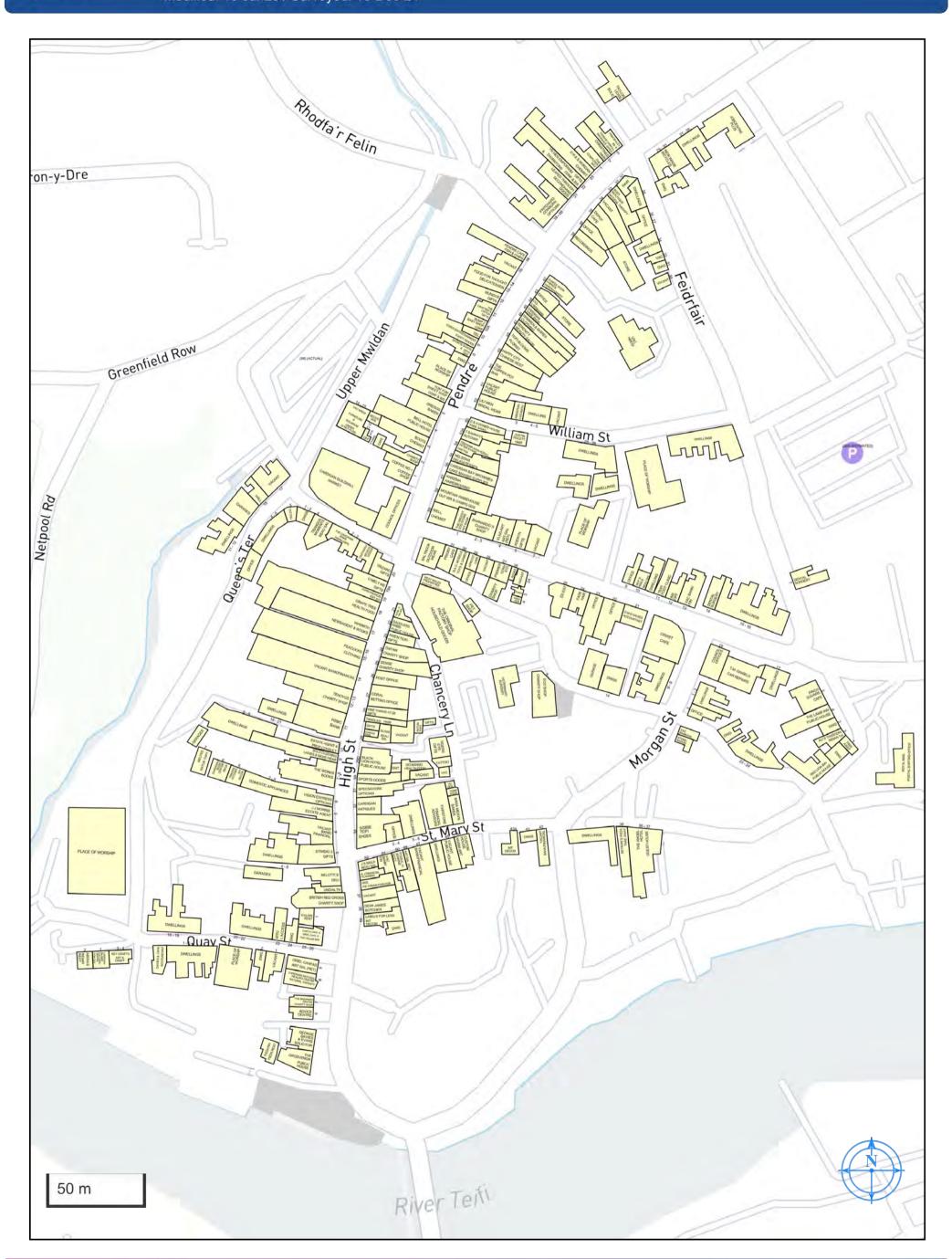


Appendix B – Experian GOAD Plan Cardigan Town Centre December 2024





Appendix C – Experian GOAD Plan Cardigan Town Centre (December 2024)







Appendix D – The 'Lidl Effect' Socio-Economic Impact Report (2024)



Lidl GB's Regional Infographics

Contents

National Region

Kantar Regions

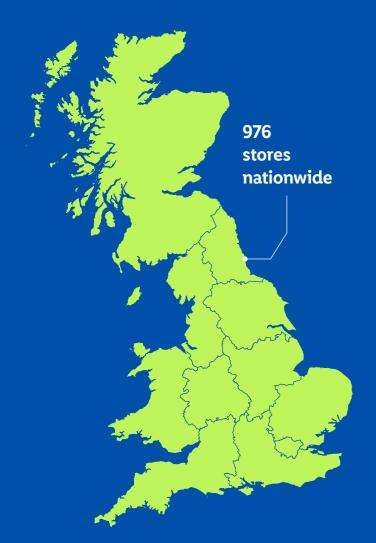
- Wales
- Scotland
- North England
- South England
- East England
- Midlands
- London

RDC Regions

- Avonmouth
- Belvedere
- Bridgend
- Doncaster
- Enfield
- Exeter
- Luton

- Motherwell
- Newton Aycliffe
- Northfleet
- Peterborough
- Runcorn
- South Hampton
- Wednesbury
- Central Functions

Our national contributions





281,813 jobs supported total

Direct 24,500 Indirect 257,313



£14.5bn GDP contribution total

Direct £1.4bn Indirect £13.1bn



Over £1bn tax contribution total



£2.6m funds donated total



18.5m meals donated total*

Avoided over 28,000 tCO,e



150,775 children educated via Foodies

^{* (}Neighbourly + His Church)

Kantar Regions

- Wales
- Scotland
- North England
- South England
- East England
- Midlands
- London

In Wales





14,928 jobs supported total

Direct 1,350 Indirect 13,578



£808.2m GDP contribution total

Direct £79.7m Indirect £728.5m



£57.5m tax contribution total



£160,485 funds donated total



Over 1m meals donated total*

Avoided over 1,600 tCO₂e



11,995 children educated via Foodies

^{* (}Neighbourly + His Church)

In Scotland





26,077 jobs supported total

Direct 2,290 Indirect 23,787



£1.4bn GDP contribution total

Direct £135.4m Indirect £1.2bn



£97.6m tax contribution total



£292,029 funds donated total



1.7m meals donated total*

Avoided over 2,500 tCO₂e



7,271 children educated via Foodies

^{* (}Neighbourly + His Church)

In North England





59,624 jobs supported total

Direct 4,997 Indirect 54,627



£3bn GDP contribution total

Direct £291.6m Indirect £2.7bn



£210.2m tax contribution total



£576,166 funds donated total



Over 4m meals donated total*

Avoided over 6,000 tCO₂e



21,754 children educated via Foodies

^{* (}Neighbourly + His Church)

In South England





72,115 jobs supported total

Direct 5,941 Indirect 66,174



£3.9bn GDP contribution total

Direct £382.3m Indirect £3.5bn



£275.6m tax contribution total



£628,784 funds donated total



4.6m meals donated total*

Avoided over 6,900 tCO₂e



30,950 children educated via Foodies

^{* (}Neighbourly + His Church)

In East England





23,281 jobs supported total

Direct 1,987 Indirect 21,294



£1.4bn GDP contribution total

Direct £135.1m Indirect £1.2bn



£97.4m tax contribution total



£218,364 funds donated total



1.9m meals donated total*

Avoided over 2,800 tCO₂e



13,555 children educated via Foodies

^{* (}Neighbourly + His Church)

In Midlands





42,793 jobs supported total

Direct 3,532 Indirect 39,261



£2.2bn GDP contribution total

Direct £213.7m Indirect £2.0bn



£154m tax contribution total



£384,111m funds donated total



2.8m meals donated total*

Avoided over 4,000 tCO₂e



44,290 children educated via Foodies

^{* (}Neighbourly + His Church)

In London





42,995 jobs supported total

Direct 4,403 Indirect 38,592



£2bn GDP contribution total

Direct £194.2m Indirect £1.8bn



£140m tax contribution total



£307,815 funds donated total



2.8m meals donated total*

Avoided over 4,000 tCO₂e



20,960 children educated via Foodies

^{* (}Neighbourly + His Church)

RDC Regions

- Avonmouth
- Belvedere
- Bridgend
- Doncaster
- Enfield
- Exeter
- Luton

- Motherwell
- Newton Aycliffe
- Northfleet
- Peterborough
- Runcorn
- South Hampton
- Wednesbury
- Central Functions

In Avonmouth





18,333 jobs supported total

Direct 1,456 Indirect 16,877



£947m GDP contribution total

Direct £93.4m Indirect £853.5m



£67.3m tax contribution total



£160,485 funds donated total



1.2m meals donated total*

Avoided 1,817 tCO₂e

In Belvedere





23,499 jobs supported total

Direct 1,883 Indirect 21,616



£1.2bn GDP contribution total

Direct £121.3m Indirect £1.1bn



£87.4m tax contribution total



£176,270 funds donated total



1.9m meals donated total*

Avoided 2,858 tCO₂e

In Bridgend





14,527 jobs supported total

Direct 1,345 Indirect 13,182



£799.8m GDP contribution total

Direct £78.9m Indirect £720.9m



£56.9m tax contribution total



£157,854 funds donated total



971,382 meals donated total*

Avoided 1,473 tCO₂e

^{* (}Neighbourly + His Church)

In Doncaster





25,758 jobs supported total

Direct 2,213 Indirect 23,544



£1.2bn GDP contribution total

Direct £122.1m Indirect £1.1bn



£88m tax contribution total



£231,519 funds donated total



1.6m meals donated total*

Avoided 2,463 tCO₂e

^{* (}Neighbourly + His Church)

In Enfield





14,367 jobs supported total

Direct 1,325 Indirect 13,042



£506.8m GDP contribution total

Direct £49.9m Indirect £456.8m



£36m tax contribution total



£97,343 funds donated total



711,151 meals donated total*

Avoided 1,079 tCO₂e

^{* (}Neighbourly + His Church)

In Exeter





20,701 jobs supported total

Direct 1,707 Indirect 18,994



£971.3m GDP contribution total

Direct £95.8m Indirect £875.5m



£69.1m tax contribution total



£160,485 funds donated total



1.3m meals donated total*

Avoided 1,985 tCO₂e

^{* (}Neighbourly + His Church)

In Luton





21,067 jobs supported total

Direct 2,221 Indirect 18,846



£1.6bn GDP contribution total

Direct £154.9m Indirect £1.4bn



£111.6m tax contribution total



£231,519 funds donated total



1.9m meals donated total*

Avoided 2,923 tCO₂e

In Motherwell





26,077 jobs supported total

Direct 2,290 Indirect 23,787



£1.4bn GDP contribution total

Direct £135.4m Indirect £1.2bn



£97.6m tax contribution total



£292,029 funds donated total



1.7m meals donated total*

Avoided 2,566 tCO₂e

In Newton Aycliffe





19,299 jobs supported total

Direct 1,595 Indirect 17,704



£997m GDP contribution total

Direct £98.3m Indirect £898.7m



£70.9m tax contribution total



£197,317 funds donated total



1.1m meals donated total*

Avoided 1,695 tCO₂e

In Northfleet





17,653 jobs supported total

Direct 1,357 Indirect 16,297



£930.6m GDP contribution total

Direct £91.8m Indirect £838.9m



£66.2m tax contribution total



£142,068 funds donated total



1.1m meals donated total*

Avoided 1,694 tCO₂e

* (Neighbourly + His Church)

In Peterborough





21,910 jobs supported total

Direct 1,591 Indirect 20,319



£1.1bn GDP contribution total

Direct £113m Indirect £1bn



£81.5m tax contribution total



£199,948 funds donated total



1.8m meals donated total*

Avoided 2,756 tCO₂e

^{* (}Neighbourly + His Church)

In Runcorn





16,855 jobs supported total

Direct 1,383 Indirect 15,471



£853m GDP contribution total

Direct £84.1m Indirect £768.9m



£60.6m tax contribution total



£173,639 funds donated total



1.5m meals donated total*

Avoided 2,339 tCO₂e

^{* (}Neighbourly + His Church)

In Southampton





17,932 jobs supported total

Direct 1,429 Indirect 16,504



£1bn GDP contribution total

Direct £102.5m Indirect £936.5m



£73.9m tax contribution total



£168,377 funds donated total



904,578 meals donated total*

Avoided 1,372 tCO₂e

^{* (}Neighbourly + His Church)

In Wednesbury





21,770 jobs supported total

Direct 1,779 Indirect 19,991



£916.7m GDP contribution total

Direct £90.4m Indirect £826.3m



£65.2m tax contribution total



£178,901 funds donated total



952,276 meals donated total*

Avoided 1,444 tCO₂e

* (Neighbourly + His Church)

In Central Functions





2,065 jobs supported total

Direct 926 Indirect 1,139



£2.3m GDP contribution total

Direct £227,737 Indirect £2.1m



£164,157 tax contribution total





Lidl GB's socioeconomic impact

A proud and major contributor to Britain

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

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

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

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

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

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

Ju. 90

Ryan McDonnell CEO of Lidl GB



Economic Impact

Social Impact

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

Methodology

Lidl GB Sustainability Repo

Beyond the basket

Environmental Impact





Certain metrics within this report have been independently assured by Forvis Mazars. More details available within our Methodology section on page 11.

The Lidl effect in numbers



Adding value to the **GB** economy?

That's more to value

Our contribution included a £474m⁺

investment in new stores and distribution centres.

£14.5bn

generated in Gross Value Added (GVA)

by Lidl and our supply chain, in 2024 alone.



A major job generator

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







Backing Britain's producers

Around 2/3^t

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

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



Giving back



Since 2017, we've raised £10m

through our NSPCC partnership.

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

In 2024, we donated more than

18.5m meals[†]

through a combination of surplus food and customer donations, via Neighbourly and His Church. These meals supported a wide range of local causes including charities, food banks, community cafés and soup kitchens. Since 2020, we've increased our local distributions four fold.

Our £14.5bn economic impact

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

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

Result: A total economic contribution of £14.5bn

Which break down like this:

£1.4bn[†]

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

£9.6bn

was created through our domestic suppliers

£3.5bn

was generated through international suppliers



How £1 becomes £10: the multiplier effect

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

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





Investment = commitment

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

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

£474m

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

And in November 2025, we proudly opened our

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

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

More than a retailer: a significant taxpayer

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

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

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



Lidl GB's tax contribution

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

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



Billions in backing for British farming

In 2024, Lidl GB invested:

£5.8bn

in British food and farmed products, with...

around 2/3

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

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

£30bn

in British food and farming!

Read more on Backing British Farming commitments here.

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

£5.8bn
in British food
and farmed
products

An employer of choice

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

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

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

> We employ over colleagues

We are guided by our values







Economic Impact

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

Every role creates more

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

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

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

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

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



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

Competitive pay

GB retail

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



Lidl GB

Mean gender pay gap: reduced

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

* Source: ONS



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

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

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

Mean gender pay gap reduced to 8.0%

> Median gender pay gap for 4 years running

Fair wages: the foundation of our supply chains' success

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

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

See our Beyond the basket report for the full story.

Community food insecurity: we're on it

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

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

The Neighbourly donations:

Represent food worth around

£31.9m

Saved almost

28,465 tCO₂e

emissions related to food waste

Helped to reduce incremental costs to the NHS by an estimated

£79.5m**

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



Discovering healthy – early

Lidl has invested £500,000 over two years in Lidl Foodies, a nationwide schools programme designed to spark a lifelong love of healthy eating. Delivered by teachers through fun, hands-on workshops, the initiative brings fruit and vegetables to life for primary school children across the UK. The programme is completely free for schools and aims to reach 250,000 pupils. By the end of FY24, over 150,000 children from 1,000 schools

had already taken part – with more than half coming from Schools in Need. We're here to 'Vegucate' the nation and make healthy food exciting, accessible and enjoyable for every child.



healthy meal

donations

Partnering for impact

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







18.5m meals donated



£2.08m generated through fundraising



£599,429 in grants for 688 causes supported



85,000 toys donated

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

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

In 2024 alone...

£2m[†]

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

To date...

£10m

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

lidl.co.uk/sustainability/sustainability-reports

Our donations funded...



13

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



38,302

counselling sessions with young people, delivered by Childline



initial assessments for young people who needed additional support

Childline counselling: there when it's needed

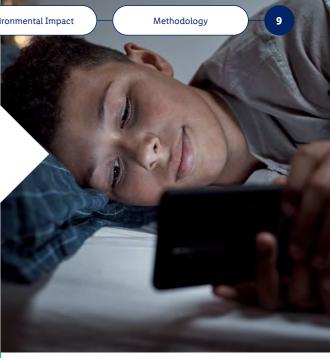
Lidl's support enables tens of thousands of Childline's counselling sessions for children and young people.

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



Unbox Your Brain campaign

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



More impact, through less impact

Our bold environmental reduction goals

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

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

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

CO, is just the start

National Insights

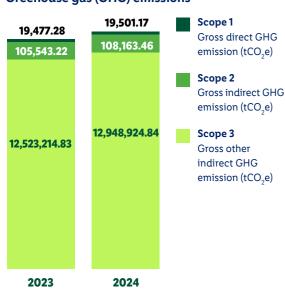


£1.75m biodiversity net gain payments



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

Greehouse gas (GHG) emissions



The mission to cut emissions

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



£11.8m

towards improving recycling infrastructure through Packaging Recovery Notes (PRNs)



94.6% of our own-label and

branded product packaging that is recyclable, reusable, refillable or renewable*



541,312 MWh energy saved through efficiency measures



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

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

Methodology

Sources of information

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

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

Scope of data reporting

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

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

Gross Value Added (GVA)

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

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

Employment

The employment impact assessment considers both direct and indirect effects.

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

Living wages & gender pay gap

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

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

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

Methodology continued

Environmental data

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

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

Benchmarking

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

Neighbourly

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

TCO $_2$ e per meal calculation: Each of the food catalogue items has its average tray weight and average CO $_2$ per tray. For food catalogue items in general 1kg item weight ~ 3.611kg CO $_2$ (which is based on the average saving of 3,611kg CO $_2$ e per tonne from diverting food surplus away from anaerobic digestion), e.g. Fruit & Veg weight is 5kg per tray, CO $_2$ is 18.055kg per tray. Our estimated tray size: 58cm(l), 40cm(w), 15cm(h).

NSPCC

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

WRAP

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

Limitations

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

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

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

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

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

Assurance

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

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