

Planning & Retail Statement

Proposed Lidl Foodstore at the former Severn
Bridge Social Club, Bulwark Road, Chepstow

Lidl Great Britain Ltd

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Prepared on Behalf of Tetra Tech Planning

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1.0 Introduction & Background

1.1 Background

1.1.1 Lidl is currently represented in Chepstow at its existing store at Bulwark Road. The existing Lidl store is a small, early generation format, operating a sales area of 858sqm net with 83 parking spaces. Owing to Lidl's well established and growing local customer base, Lidl has outgrown its existing premises which no longer meets modern shopper requirements; a larger store is necessary to safely cater to local customer demand. The constrained nature of the existing plot means an extension to the existing store is not feasible and the development of a new store in the immediate locality to serve the existing customer base is therefore being sought.

1.2 Introduction

1.2.1 This planning and retail statement has been prepared by Tetra Tech Planning on behalf of the applicant, Lidl Great Britain Ltd., in support of a full planning application to Monmouthshire County Council for the demolition of the former Severn Bridge Social Club and erection of a supermarket, car parking, landscaping and all associated works at the former Severn Bridge Social Club, Bulwark Road, Chepstow.

1.2.2 The proposed new store has a sales area of 1,284sqm (an increase of 426sqm net from the existing store) with 89 dedicated parking spaces.

1.3 Report Structure

1.3.1 This Statement considers the planning merits of the proposals in the context of relevant national and local planning policy and is structured as follows.

- Section 2: describes the site, the relevant planning history and the proposed development;
- Section 3: sets out the local and national planning policy context;
- Section 4: considers the application of the sequential approach to site selection;
- Section 5: assesses the retail impact of the proposed development;
- Section 6: considers non-retail material considerations; and
- Section 7: provides a summary of conclusions

1.3.2 It should be noted from the outset of this Statement, as paragraph 6.2 of Technical Advice Note (TAN) 4 makes explicitly clear, that "the requirement to consider need for a development is not relevant for retail proposals within a defined retail and commercial centre in a development plan."

1.3.3 Accordingly, given the application site lies within a defined commercial centre in the adopted Monmouthshire LDP (Bulwark Neighbourhood Centre) a retail need assessment is not required.

- 1.3.4 TAN 4 makes clear at paragraph 8.2 that retail applications of 2,500sqm or more gross floorspace that are proposed on the edge of or outside retail and commercial centres should be supported by a retail impact assessment.
- 1.3.5 It is also important to note from the outset the application site a) lies in a commercial centre, and b) the proposed foodstore measures 2,016sqm gross (1,284sqm net); this is substantially less than the TAN4 prescribed floorspace threshold where impact assessments are typically sought.
- 1.3.6 Notwithstanding this, in the interests of robustness this Statement provides a proportionate assessment of impact of the proposed development.

2.0 The Proposed Development

2.1 Site Description & Surroundings

- 2.1.1 The application site is located within Chepstow, at Bulwark Neighbourhood Centre, approximately 900 metres south of Chepstow town centre. Extending to approximately 0.58ha, the application site currently comprises the former social club building (including the club steward's flat), a small retail unit, car park and areas of soft landscaping. The main vehicular access is currently achieved from site's southern boundary, from the access road which serves the neighbouring industrial estate. A large car park adjoins the east of the former social club building, which wraps around the property from north to south. The existing small retail unit is served from Bulwark Road at the site's western boundary.
- 2.1.2 The former social club building was constructed in the 1960s and is primarily single storey in height with a double height space at the main hall. The property is unoccupied and has been vacant since the social club closed down in October 2019. A survey of the application site indicates that trespass, vandalism and theft have been considerable issues in recent times since the clubs closure, with all windows and door boarded up in order to prevent further damage. However, the club is in an extremely poor state of repair and considered to be unviable for retention of its former use.
- 2.1.3 In terms of surroundings, the site is located approximately 350 metres west of the banks of the river Wye. The surrounding locality can be characterised as an area of mixed uses, including residential properties to the north, industrial uses to the east and south and retail uses to the west.
- 2.1.4 The site is located within Flood Zone A and is considered to be at little or no risk of fluvial or coastal/tidal flooding (as indicated on NRW's Development Advice Map). The Cadw Designated Historic Assets map confirms there are no designated heritage assets, including listed buildings and scheduled ancient monuments within or in the immediate vicinity of the application site.
- 2.1.5 There are no public rights of way affecting the site.

2.2 Planning History

- 2.2.1 A search of the Monmouthshire County Council online planning register identifies the following historical planning applications at the subject site:

Application	Location	Proposal	Decision
DC/2006/01324	Former Social Club building	Extension to the club steward's flat at first floor level to provide an additional bedroom and increase living room area.	Approved January 2007
DC/2006/01325	Former Social Club building and wider site	Demolition of existing detached retail unit. Extension to existing social club to provide 1. Cafe for club members. 2. Retail Unit to be used as bookmakers	Approved March 2007

DC/2008/01184	Standalone retail unit	Change of use for dog grooming business.	Approved December 2008
DC/2016/01210	Social Club car park	Situation of static food/catering van.	Approved February 2017

2.3 The Proposed Development

- 2.3.1 It is proposed to demolish the existing former social club building and standalone retail unit and erect a Lidl foodstore, measuring 2,016sqm gross (1,284sqm net). The foodstore is proposed to be served by a 89no. space surface level car park, dedicated servicing area, landscaping and all associated works.
- 2.3.2 Access is proposed via the site's southern boundary, from the access road that serves the neighbouring industrial estate. The proposals show a moving of the existing access bellmouth a small distance closer to Bulwark Road. Pedestrian access and linkages to the store entrance are proposed from the site's southern border, via a zebra crossing. Perimeter landscaping is proposed to frame the proposed development within its wider setting.
- 2.3.3 The store will be built in accordance with Lidl's brand new specification providing a lighter, more spacious sales area, with full height glazing to the front elevation, and with no suspended ceiling. Proposed elevations have been considerably designed along the main aspects, providing activity and identity to the public frontages.
- 2.3.4 The proposed store has been positioned to the north east of the site. The eastern and southern areas of the site are to be customer parking with vehicle and pedestrian access. Goods deliveries will be made via the recessed loading bay which is situated adjacent to the warehouse space. The store's dedicated delivery facility will be accessed via an HGV grade vehicle ramp directly in front of the delivery pod door.
- 2.3.5 The proposed development is outlined in detail in the accompanying Design and Access Statement.

3.0 Planning Policy Context

3.1 Introduction

3.1.1 The statutory development plan is the Monmouthshire County Council Local Development Plan 2011-2021 which was adopted on 27th February 2014. in addition to the National Development Framework for Wales (Future Wales: The National Plan 2040). Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that planning applications and appeals be determined in accordance with the development plan “*unless material considerations indicate otherwise*”

3.1.2 Section 38(4) of the PCPA 2004 (as amended) states that:

“For the purposes of any area in Wales the development plan is: (a)the National Development Framework for Wales, (b) the strategic development plan for any strategic planning area that includes all or part of that area, and (c) the local development plan for that area”.

3.1.3 Accordingly, the policies of relevance contained within the National Development Framework and the adopted LDP are now discussed.

Future Wales: The National Plan 2040

3.1.4 Future Wales sets out a spatial strategy as a guiding framework for where large-scale change and nationally important development will be focused over the next 20 years. The policies of the Spatial Strategy which are relevant to the scheme are now discussed.

3.1.5 **Policy 1** – ‘Where Wales will grow’ indicates the Welsh Government supports sustainable growth in all parts of Wales. Chepstow is situated outside of the identified National and Regional Growth Areas and is considered a rural settlement in this context. As such, Policy 1 states “Development and growth in towns and villages in rural areas should be of appropriate scale and support local aspirations and need”. Additionally, the supporting text indicates in respect of communities in rural areas, “the aim is to secure sustainable economic and housing growth which is focused on retaining and attracting working age population and maintaining and improving access to services”.

3.1.6 **Policy 6** - ‘Town Centres First’ indicates significant new commercial, retail, education, health, leisure and public service facilities must be located within towns and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region.

3.2 Monmouthshire Adopted Local Development Plan 2011-2021

3.2.1 The Proposals Map indicates the application site is subject to the following designations/allocations within the adopted LDP:

3.2.2 **Policy RET3** - ‘Neighbourhood Centres’ Indicates development proposals for retail development (use class A1) in designated neighbourhood centres will be permitted provided that the

development, either individual or cumulatively with other recent or proposed developments, does not undermine the vitality, attractiveness or viability of town or local centres.

- 3.2.3 **Policy S1** – ‘The Spatial Distribution of New Housing Provision’ indicates the main focus for new housing development is within or adjoining the Main Towns of: Abergavenny; Chepstow and Monmouth.
- 3.2.4 In addition to the policies outlined above, the application site is subject to the following relevant policies of the adopted LDP:
- 3.2.5 **Policy S6** - ‘Retail Hierarchy’ defines the hierarchy of retail centres in Monmouthshire and indicates all new or enhanced retail and commercial development will be focussed in the County’s main towns and local/neighbourhood centres, and should be consistent in scale and nature with the size and character of the centre and its role within the hierarchy. Proposals which would undermine the retail hierarchy will not be permitted. Policy S6 identifies Bulwark (Chepstow) as a neighbourhood centre.
- 3.2.6 **Policy RET4** - ‘New Retail Proposals’ seeks to focus future retail and commercial leisure/entertainment development in the county designated Central Shopping Area. This is considered essential in strengthening the centres’ role/ function in the retail hierarchy, reinforcing their attractiveness to local communities and visitors in maintaining and enhancing their vitality and viability. The policy also supports sustainability objectives by focusing such facilities on accessible locations and contributing to a reduction in travel demand.
- 3.2.7 **Policy S5**- ‘Community and Recreational Facilities’ Indicates development proposals that provide and/or enhance community and recreation facilities will be permitted within or adjoining town and village development boundaries subject to detailed planning considerations. Development proposals that result in the unjustified loss of community and recreational facilities will not be permitted.

- 3.2.8 **Policy CRF1** - 'Retention of Existing Community Facilities' States "The change of use or conversion to other uses neighbourhood or village shops, halls, public houses and other community facilities will only be permitted where:
- a) The local community would continue to be adequately served by facilities to which there is easy and convenient access by means other than the private car;
 - b) There is evidence that the facility is not, and could not reasonably be expected to become, financially viable or the facility, if non-operational has been vacant for a substantial period of time; and
 - c) Genuine attempts at marketing the facility, whether in use or vacant, have been unsuccessful
- 3.2.9 Except in circumstances where loss of the whole facility would be acceptable, the change of use of part of facility will not be permitted if it would prejudice the long-term retention of the remainder.
- 3.2.10 **Policy S7**- 'Infrastructure Provision' states that the infrastructure needed to service and deliver sustainable development must be in place or provided in phase with proposed development. Where existing infrastructure is inadequate to serve the development, new or improved infrastructure and facilities to remedy deficiencies must be provided. Where provision on-site is not appropriate, off-site provision, or a financial contribution towards it, will be sought.
- 3.2.11 Financial contributions will also be required towards the future management and maintenance of facilities provided, either in the form of initial support or in perpetuity.
- 3.2.12 Planning Obligations may be sought to secure improvements in infrastructure, facilities, services and related works, where they are necessary to make development acceptable. In identifying appropriate contributions due regard will be paid to the overall development viability, including the cost of measures that are necessary to physically deliver a development and ensure that it is acceptable in planning terms.
- 3.2.13 **Policy SD4** – 'Sustainable Drainage' indicates development proposals will be expected to incorporate water management measures, including SuDS to reduce surface water run-off and minimise its contribution to flood risk elsewhere.
- 3.2.14 **Policy NE1** – 'Nature Conservation and Development' indicates development proposals that would have a significant adverse effect on a locally designated site of biodiversity and / or geological importance, or a site that satisfies the relevant designation criteria, or on the continued viability or priority habitats and species will only be permitted where the need for the development

clearly outweighs the nature conservation or geological importance of the site; and it can be demonstrated the development cannot reasonably be located elsewhere.

- 3.2.15 Where development is permitted, it will be expected that any unavoidable harm is minimised by effective avoidance measures and mitigation. Where this is not feasible appropriate provision for compensatory habitats and features of equal or greater quality and quantity must be provided.
- 3.2.16 Where nature conservation interests are likely to be disturbed or harmed by development proposals, applications must be accompanied by an ecological survey and assessment of the likely impact of the proposal on the species /habitats, and, where necessary, shall make appropriate provision for their safeguarding. Additionally, the policy provides a criteria for nature conservation interests and new development.
- 3.2.17 **Policy EP1** – ‘Amenity and Environmental Protection’ indicates development should have regard to the privacy, amenity and health of occupiers of neighbouring properties. Development proposes that would cause or result in an unacceptable risk / harm to local amenity, health, the character / quality of the countryside or interests of nature conservation, landscape or built heritage importance due to the following will not be permitted, unless it can be demonstrated that measures can be taken to overcome any significant risk:
- Air pollution;
 - Light pollution;
 - Noise pollution;
 - Water pollution;
 - Contamination;
 - Land instability;
 - Or any identified risk to public health or safety.
- 3.2.18 **Policy MV1** – ‘Proposed Developments and Highway Considerations’ indicates all development that is likely to have a significant impact on trip generation and travel demand must be accompanied by a Transport Assessment. Development that is likely to create significant and unacceptable additional traffic growth in relation to the capacity of the existing road network and / or fails to provide a safe and easy access for road users will not be permitted, unless appropriate proposals for related improvements to the highway system or a contribution towards mitigating traffic management / reduction measures are made.
- 3.2.19 **Policy DES 1** – ‘General Design Considerations’ all development should be of a high quality sustainable design and respect the local character and distinctiveness of Monmouthshire’s built,

historic and natural environment. The policy provides a comprehensive design criteria for new development.

3.3 National Planning Policy

The Well-Being of Future Generations (Wales) Act 2015

3.3.1 The Well-Being of Future Generations (Wales) Act 2015 (which came into force on 1st April 2016) requires “public bodies to do things in pursuit of the economic, social, environmental and cultural well-being of Wales in a way that accords with the sustainable development principle”. The Act sets out seven ‘well-being’ goals as follows:

- A prosperous Wales: An innovative, productive and low carbon society which recognises the limits of the global environment and therefore uses resources efficiently and proportionately (including acting on climate change); and which develops a skilled and well-educated population in an economy which generates wealth and provides employment opportunities, allowing people to take advantage of the wealth generated through securing decent work.
- A resilient Wales: A nation which maintains and enhances a biodiverse natural environment with healthy functioning ecosystems that support social, economic and ecological resilience and the capacity to adapt to change (for example climate change).
- A healthier Wales: A society in which people’s physical and mental well-being is maximised and in which choices and behaviours that benefit future health are understood.
- A more equal wales: A society that enables people to fulfil their potential no matter what their background or circumstances (including their socio-economic background and circumstances).
- A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- A globally responsive wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

3.3.2 Within the Act, sustainable development is defined as follows: “the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals”.

3.3.3 The Act sets out that when making decisions, public bodies need to take into account the impact they could have on people living in Wales in the future and must apply the sustainable development principle in all decisions.

Planning Policy Wales (PPW) Edition 11 (February 2021)

3.3.4 The primary objective of PPW 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, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation.

3.3.5 PPW sets out that, in order to maximise well-being and the creation of sustainable places, the concept of ‘placemaking’ should be at the heart of the planning system. It is stated at Paragraph 2.8 that development proposals “must seek to promote sustainable development and support the well-being of people and communities across Wales. This can be done through maximising their contribution to the achievement of the seven wellbeing goals and by using the five Ways of Working, as required by the Well-being of Future Generations Act. This will include seeking to maximise the social, economic, environmental and cultural benefits, while considering potential impacts when assessing proposals and policies in line with the Act’s Sustainable Development Principle”. Paragraph 2.9 goes on to clarify that “The most appropriate way to implement these requirements through the planning system is to adopt a placemaking approach to plan making, planning policy and decision making”.

3.3.6 PPW defines placemaking as follows: “Placemaking is a holistic approach to the planning and design of development and spaces, focused on positive outcomes. It draws upon an area’s potential to create high quality development and public spaces that promote people’s prosperity, health, happiness, and well-being in the widest sense”.

3.3.7 A set of ‘national sustainable placemaking outcomes’ are outlined within PPW, which it advises should be used to inform the assessment of development proposals. The national outcomes are defined as follows:

- **Creating and Sustaining Communities**
 - Enables the Welsh language to thrive
 - Appropriate development densities
 - Homes and jobs to meet society’s needs
 - A mix of uses
 - Offers cultural experiences
 - Community based facilities and services

- **Making Best Use of Resources**
 - Makes best use of natural resources
 - Prevent waste
 - Priorities the use of previously developed land and existing buildings
 - Unlocks potential and regenerates
 - High quality and built to last
- **Maximising Environmental Protection and Limiting Environmental Impact**
 - Resilient biodiversity and ecosystems
 - Distinctive and special landscapes
 - Integrated green infrastructure
 - Appropriate soundscapes
 - Reduces environmental risks
 - Manages water resources naturally
 - Clean air
 - Reduces overall pollution
 - Resilient to climate change
 - Distinctive and special historic environments
- **Growing Our Economy in a Sustainable Manner**
 - Fosters economic activity
 - Enables easy communication
 - Generates its own renewable energy
 - Vibrant and dynamic
 - Adaptive to change
 - Embraces smart and innovative technology
- **Facilitating Accessible and Healthy Environments**
 - Accessible and high quality green space
 - Accessible by means of active travel and public transport
 - Not car dependent
 - Minimises the need to travel
 - Provides equality of access

- Feels safe and inclusive
- Supports a diverse population
- Good connections
- Convenient access to goods and services
- Promotes physical and mental health and well-being

3.3.8 It is stated at Paragraph 2.15 that “The outcomes provide a framework which contains those factors which are considered to be the optimal outcome of development plans and individual developments”.

3.3.9 Paragraph 2.20 clarifies that “not every development or policy proposal will be able to demonstrate they can meet all of these outcomes, neither can it necessarily be proved at the application or policy stage that an attribute of a proposal will necessarily lead to a specific outcome. However, this does not mean that they should not be considered in the development management process to see if a proposal can be improved or enhanced to promote wider well-being. It is for developers and planning authorities to identify these opportunities and act upon them”.

Retail Policy

3.3.10 Section 4.3 of PPW relates to retail and commercial development. Paragraph 4.3.14 states that “when determining planning applications for retail uses, planning authorities should first consider whether there is a need for additional retail provision”. Need may be quantitative or qualitative.

3.3.11 Paragraph 4.3.18 sets out that the Welsh Government “operates a ‘town centres first’ policy in relation to the location of new retail and commercial centre development”, and in implementing this policy, “planning authorities should adopt a sequential approach when determining planning applications for retail and other complementary uses”.

3.3.12 In regards to the need to undertake a Retail Impact Assessment, it is confirmed at Paragraph 4.3.26 that “All retail planning applications or retail site allocations of 2,500 sq. metres 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”.

Economic Development Policy

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

3.3.14 In assessing the sustainable benefits of development paragraph 2.28 states local planning authorities should ensure that social, economic, environmental and cultural benefits are considered in the decision-making process. Economic considerations include::

- The numbers and types of jobs expected to be created or retained on the site;
- Whether and how far the development will help redress economic disadvantage or support regeneration priorities, for example by enhancing employment opportunities or upgrading the environment;
- A consideration of the contribution to wider spatial strategies, for example for the growth or regeneration of certain areas.

3.4 Other Material Considerations

Technical Advice Note 4: Retail and Commercial Development 2016

3.4.1 Paragraph 6.2 of TAN 4 makes it clear that the requirement to consider need for a development is not relevant for retail proposals within a defined retail and commercial centre in a development plan.

3.4.2 TAN 4 states at paragraph 8.2 that retail applications of 2,500sqm or more gross floorspace that are proposed on the edge of or outside retail and commercial centres should be supported by a retail impact assessment. Smaller retail planning applications or site allocations may also be assessed where local planning authorities believe it will have a significant impact on a retail and commercial centre. Requests for retail impact assessments by local planning authorities on smaller developments should be proportionate to potential impacts.

3.4.3 Paragraph 8.3 of TAN 4 explains that “In addition to the needs and sequential tests, planning applications for retail developments **on the edge of or outside a retail or commercial centre** that are not in accordance with the development plan should be assessed against a range of impact criteria...”, (Tt emphasis). Notwithstanding this, it is important to note the proposed development lies **in centre** in retail planning terms meaning the advice at paragraph 8.3 of TAN 4 is not strictly applicable. However, in the interests of robustness a proportionate impact assessment has been provided.

Technical Advice Note 18: Transport 2016

3.4.4 TAN18 is concerned with transport and the impact that development is likely to have upon transport situations and traffic. Section 3 of the TAN relates to the location of development and the impact of major travel-generating uses. Paragraph 3.7 sets out that where possible employment development should be located in central locations, close to public transport interchanges and accessible by cycling and on foot, in order to reduce the dependency on the private car.

3.4.5 Section 4 concerns car parking. Paragraph 4.6 states that “maximum car parking standards should be used at regional and local level as a form of demand management. Turning minimum

standards into maximum standards will not necessarily be appropriate. Therefore, evidence based on the likely effects of different parking levels for each land use should be considered, including consideration of the relative locations of land uses and their consequent accessibility. Required parking for those with disabilities should be fully specified in any adopted parking strategy in terms of space dimensions and proportions of the total number of spaces”.

- 3.4.6 Paragraph 4.13 states “Maximum parking standards should not be applied so rigidly that they become minimum standards. Maximum standards should allow developers the discretion to reduce parking levels.”

Technical Advice Note 23: Economic Development 2014

- 3.4.7 TAN 23 defines economic development broadly so that it can include any form of development that generates wealth, jobs and income. Paragraphs 1.2.1-2 state that the economic benefits of proposals and market needs should be fully considered when determining planning applications: “The economic benefits associated with development may be geographically spread out far beyond the area where the development is located.

- 3.4.8 As a consequence, it is essential that the planning system recognises, and gives due weight to, the economic benefits associated with new development....PPW advises that planning for economic land uses should aim to provide the land that the market requires, unless there are good reasons to the contrary. Where markets work well, this will help maximise economic efficiency and growth”.

- 3.4.9 Paragraph 1.2.5 states: “Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.”

Building Better Places – The Planning System Delivering Resilient and Brighter Futures. Placemaking and the Covid-19 recovery, (July 2020)

- 3.4.10 The Welsh Government has recently published its policy position on how the planning system can assist in the Covid-19 recovery period within the ‘Building Better Places’ document (July 2020). The Ministerial forward makes clear that “We need an environmental, social, cultural and economic recovery which is sustainable” and notes that Planning Policy Wales (PPW 10) “contains the principles and policies needed for us to recover from this situation in a positive manner” and that “This guide pinpoints the most relevant policy priorities and actions to aid in the recovery”.

- 3.4.11 It is clear the document is a “guide” intended to sit alongside PPW 10 and therefore forms a material consideration in the determination of planning applications of somewhat less weight than PPW 10 itself. This is further underscored in the document’s introduction which confirms that “the Welsh Government’s policy direction towards better places and placemaking [largely contained in PPW 10] has not changed.”

3.4.12 The Building Better Places guide develops on the recent letter issued to the Chief Planning Officers from Julie James, Minister for Housing and Local Government (7th July 2020) which sets out the anticipated economic consequences of the Covid-19 pandemic, including the impacts on construction and the built environment. The document emphasises the need to encourage ‘place-making’, as advocated by PPW 10, at the heart of the recovery process.

Monmouthshire Retail Background Paper 2019

3.4.13 In accordance with the LDP, the Retail Background Paper sets out the retail hierarchy, which includes the Bulwark Neighbourhood Centre. The Retail Background Paper states “There are a number of Neighbourhood Centres within the County, which represent district-shopping locations separate from the town centre. Neighbourhood Centres vary in size and location and can comprise of a large centre such as Bulwark in Chepstow or form individual neighbourhood stores such as Wyesham in Monmouth, reflecting the retailing requirements of the local neighbourhood”.

3.4.14 The Retail Background Paper provides retail profiles for the main county towns and provides insight towards the key measures of vitality and viability in Monmouthshire including Chepstow, Abergavenny and Monmouth centres.

3.4.15 The Retail Background Paper indicates Bulwark Neighbourhood Centre is the largest of the County’s neighbourhood centres. It highlights the important role of Lidl noting “Both Lidl and the bank of shops to the east of the Bulwark Road have been redeveloped in recent years improving the overall environmental quality of the centre”.

3.4.16 The 2015 Household Survey data indicates the existing Lidl store in Bulwark has seen significant growth in its share of trade, mirroring a national trend witnessed in the growth of discounters. The existing Lidl store has a share of 33% of respondents who visited Chepstow for their main food shop.

3.4.17 In respect of future retail development, paragraph 6.12.1 states “...there are no proposed retail developments with either outline or full planning permission within the CSA (central shopping area) of Chepstow”.

3.5 Summary

3.5.1 To summarise, the adopted LDP proposals map indicates the application site is advantageously located within the Bulwark Neighbourhood Centre, under Policy RET3 which states retail proposals within neighbourhood centres will be permitted provided development does not undermine the vitality, attractiveness or viability of town or local centres. Furthermore, Policy S6 ‘Retail Hierarchy’ indicates all new or enhanced retail development will be focussed in the County’s main towns and neighbourhood centres, and should be consistent in scale and nature with the size and character of the centres and its role within the hierarchy. In respect of the loss of community facilities, Policy S5 indicates developments that result in the unjustified loss of community and recreational facilities will not be permitted. Additionally, Policy CRF1 states the changes of use or conversion of community facilities will only be permitted where, (inter alia) the

facility is not, and could not reasonably be expected to become financially viable or if non-operational, has been vacant for a substantial period of time.

- 3.5.2 Considering the national planning policy context, PPW11 indicates previously development land should be used in preference to greenfield sites. Within settlements such land should generally be considered suitable for development where its re-use will promote sustainability principles. Turning to retail considerations, in respect of the needs test, there is no requirement to demonstrate the need for development within defined retail and commercial centres. As highlighted above, PPW11 adopts a 'town centres first' policy concerning the location of new retail centre development. On this basis, a sequential test for site selection should be adopted by planning authorities when determining planning applications for retail development. The first preference of the sequential approach seeks to locate new retail development within a retail centre as defined in the local development plan hierarchy of centres. As such, these proposals conform to the 'town centres first' approach by locating development within a defined centre. Hence, a sequential site search is not a requirement of this Statement.
- 3.5.3 In respect of the need to undertake a Retail Impact Assessment, PPW11 indicates all proposals of 2,500 sqm and above that are situated on the edge or outside of designated centres should be supported by an assessment. Although the proposed development is below the threshold and is located within a designated centre a proportionate impact assessment has been undertaken in the interest of providing comprehensive and robust retail planning justification.

4.0 The Sequential Approach to Site Selection

4.1 Introduction

4.1.1 The requirements of the sequential approach to site selection are set out at paragraphs 4.3.18 to 4.3.24 of PPW. In summary, PPW advises “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.” (para 4.3.18)

4.1.2 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.

4.1.3 The existing Lidl store is located outside, but adjacent to Bulwark Neighbourhood Centre in an out of centre location in sequential terms.

4.2 Sequential status of the application site

4.2.1 The application site is previously developed land (PDL) located within the settlement boundary.

4.2.2 It forms part of the defined Bulwark Neighbourhood Centre as indicated by the adopted LDP Proposals Map (adopted February 2014).

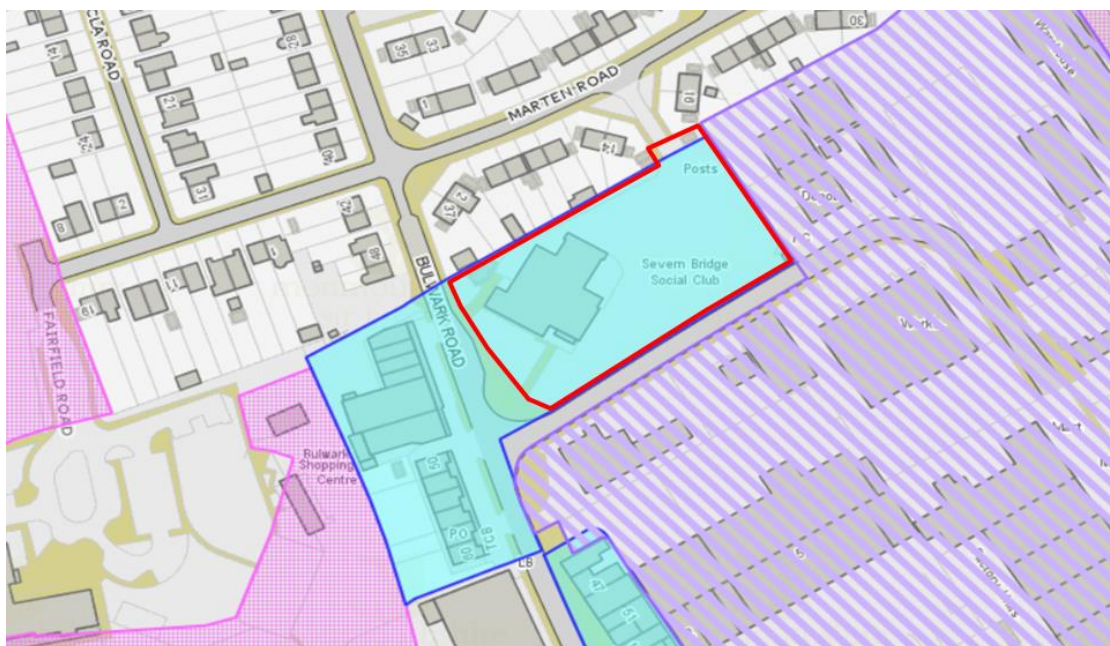


Figure 1.0: The application site (outlined red) lies within Bulwark Neighbourhood Centre - identified by the light blue shading on Proposals map extract above.

4.2.3 Notwithstanding the Neighbourhood Centre designation, the application site is not allocated for any specific land use i.e. it is ‘white land’.

4.2.4 The LDP sets out the retail hierarchy, with main retail centres (the closest being Chepstow) at the top, local centres at Magor, Raglan and Usk, followed by neighbourhood centres (of which

Bulwark Road is one). As such, as advocated by PPW, the application site lies with a commercial centre defined within the local development plan centre hierarchy.

4.2.5 LDP Policy S6 (Retail Hierarchy) states that all new or enhanced retail and commercial developments will be focused on the County's main towns – Abergavenny, Caldicot, Chepstow and Monmouth – and in local/neighbourhood centres (such as Bulwark Road Neighbourhood Centre).

4.3 Application of the Sequential Approach

4.3.1 The application site's sequentially preferable status means a sequential site search is not required; the application site lies within a defined commercial centre and is inherently sequentially preferable.

4.3.2 The application site meets the physical requirement of the proposed development; that is:

- A site that can accommodate a store in excess of 2,100sqm gross to allow for provision of enhanced customer choice based on a full product range offer. The need to relocate to a larger store will address the deficiencies of the existing store.
- A site within the immediate vicinity of the existing store to ensure that existing customers can continued to be served.
- 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. This must be at least as prominent as the existing store or else there is no rationale for the relocation;
- A site that is easily accessible by a choice of means of transport;
- A site that is able to offer adjacent surface level car parking, so that customers can easily transfer goods to their vehicles, as they can from the existing store. To have otherwise would severely impact the appeal and viability of the store; and
- Provision of a dedicated service area to the rear of the store, including the ability to accommodate HGV's.

4.3.3 The proposed development will mean the delivery of a foodstore at an in-centre location. The proposed development is considered to fully satisfy the sequential approach to site selection.

4.4 Conclusion

4.4.1 The proposed development seeks to deliver a retail development within a defined commercial centre (as defined in the adopted LDP). The application site is sequentially preferable.

The proposed development is considered, therefore, to fully accord with local and national policy and guidance outlined in PPW, TAN 4 and the LDP with respect to the sequential approach.

5.0 Assessment of Impact

5.1 Introduction

- 5.1.1 TAN 4 makes clear at paragraph 8.2 that retail applications of 2,500sqm or more gross floorspace that are proposed on the edge of or outside retail and commercial centres should be supported by a retail impact assessment.
- 5.1.2 Smaller retail planning applications or site allocations may also be assessed where local planning authorities believe it will have a significant impact on a retail and commercial centre. Requests for retail impact assessments by local planning authorities on smaller developments should be proportionate to potential impacts.
- 5.1.3 It is important to recall at the outset of this chapter, as outlined in the preceding sections, that there is no policy requirement to demonstrate need for the proposed development. Moreover, the proposed development seeks to deliver a retail foodstore on previously developed “white” land at a sequentially preferable location i.e. within a defined commercial centre in the local retail hierarchy.
- 5.1.4 It is also important to note the proposed foodstore measures 2,016sqm gross (1,284sqm net) which is substantially less than the TAN4 prescribed floorspace threshold where impact assessments are typically sought.
- 5.1.5 Notwithstanding the above, in the interests of robustness this chapter consider the anticipated impact of the proposed development in a proportionate way.
- 5.1.6 It considers the potential trading impact of the proposals in respect of the anticipated diversion of retail trade to the proposed foodstore, with particular regard to Bulwark Neighbourhood Centre (within which the application site sits).

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

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

5.2.2 Retail allocations in the surrounding area have been investigated. We are not aware of any known notable existing, committed or planned in-centre retail investment proposals in the surrounding area upon which the proposed development may give rise to unacceptable impact.

5.2.3 On the contrary, the proposed development, itself, constitutes a comprehensive commercial centre investment proposal. The proposed development will deliver significant in centre investment; in this respect its impact is considered to be entirely policy compliant and positive.

5.3 Impact on allocated sites outside centres

5.3.1 Any potential impact on allocated sites outside centres must be weighed against the manifestly positive in centre impact of the development proposal itself (which is considered further below).

5.3.2 Retail allocations outside centres have been considered as part of the application of the sequential test. There are no allocated sites outside the commercial centre in the surrounding area upon which the proposed development may unacceptably impact.

5.4 Cumulative effects of the development

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

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

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

Table 1.0 Proposed development turnover 2021-2026

	Gross internal area (sqm)	Total Net Sales (sqm)	Net sales area (sqm)	Trading density (£/sqm)	Turnover 2021 (£m)	Turnover 2026 (£m)
	[1]	[2]	[3]	[4]	[5]	[6]
Lidl Foodstore	2,016	1,284				
<i>Convenience f/s</i>			1,027	10,346	10.6	10.6
<i>Comparison f/s</i>			257	6,642	1.7	2.0
Total					12.3	12.6

Notes

[1] & [2] Net sales area taken from application drawings

[3] assumed 80% net conv sales & 20% comp sales

[4] s/d taken from Global Data (2018 price base)

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

[6] turnover rolled forward to 2026 based on assumed f/s efficiency increase (0.0% conv and 3.0% comp p/a) (EXRPBN 18 Figs 4a&b (Oct 2020))

5.5.2 The turnover of the proposed development is set out in the above table. The anticipated benchmark turnover of the proposed additional floorspace is assessed to be £12.6m in 2026.

Table 2.0 Existing & Proposed store - Turnover comparison 2021

Units	Floorspace		Sales density	Turnover
	gross sqm	net sqm	£/sqm	£m
	[1]	[2]	[3]	[4]
Existing Lidl foodstore		858		
Convenience floorspace		729	10,346	7.5
Comparison floorspace		129	6,642	0.9
Total turnover				8.4
Proposed Lidl foodstore	2,016	1,284		
Convenience floorspace		1,027	10,346	10.6
Comparison floorspace		257	6,642	1.7
Total turnover				12.3
Difference +/-				3.9

Notes:

[1] & [2] approved/ proposed drawings

[3] Lidl s/d Globaldata (2018 price base)

[4] [2]x[3]/1,000,000

5.5.3 The table above provides a comparison of the benchmark turnover of the proposed store (in centre) and the existing Lidl store (out of centre). The anticipated benchmark turnover of the proposed store is anticipated to be c.3.9m more than the existing store.

5.5.4 The existing Bulwark store is one of Lidl's small, early generation stores. The operational and customer requirements were very different to the requirements of today. Lidl (and the store's) growing popularity since first opening means this store is no longer fit for purpose; it is no longer able to accommodate Lidl's operational format which has evolved over the years as the company's popularity has grown. The rationale for the proposed relocation to the nearby centre is clear; additional internal space is required to meet Lidl's present-day operational requirement. Obtaining a planning consent will ensure that Lidl continues to be able to suitably serve local needs from this well-established store, albeit from a location which is sequentially preferable and benefits the centre in terms of turnover and trade.

5.5.5 The development is primarily intended to enhance Lidl's trading presence by delivering a larger sales area but also a commensurately scaled non-trading 'back of house' warehouse and ancillary staff area. This will help improve store operations, which in turn will deliver an improved customer

- experience from an in-centre location, with associated linked trips benefits for neighbouring in centre operators.
- 5.5.6 It is now widely accepted that smaller format Limited Assortment Discounters (LAD) have become increasingly popular in the last decade. This popularity has led to operational and logistical inefficiencies and subsequent challenges in servicing the store's established customer base. The effect of the increasing popularity of existing LADs is difficult to quantify, although as outlined above the Monmouthshire Retail Background Paper notes that the existing "Lidl store in Bulwark has seen significant growth in its share of trade, mirroring a national trend witnessed in the growth of discounters." The qualitative issues that have arisen since Lidl's early stores opened, and their subsequent growth in market share, are apparent in store. The existing store is inadequate leading to operational difficulties and a detrimental customer experience.
- 5.5.7 The existing store suffers from an acute shortage of ancillary, warehouse and staff welfare space. In short, the offer has outgrown the existing store. The existing store is also incapable of offering a bakery as is now the norm for Lidl stores. The new store will improve on storage, thus reducing lorry movements, as well as improving staff welfare facilities and customer experience by enabling a full range of goods to be sold in the store.
- 5.5.8 Chapter 11 of PPW advises that wherever possible retail provision should be located in proximity to other commercial businesses, facilities for leisure, community facilities and employment. Obtaining consent to develop an improved store in Bulwark centre allows a well-established, popular retail store to be redelivered in an improved manner, whilst minimising any potential wider effects on existing shopping patterns.
- 5.5.9 In respect of trading effects, the most obvious change following the development of the proposal between 2021-26 is that there is anticipated to be a substantial uplift in centre turnover at Bulwark Neighbourhood Centre. This is as a result of the opening of the new Lidl store.
- 5.5.10 The proposed additional sales floorspace is suitably modest and will allow for a more spacious shopping layout and address e.g. cramped aisles and congested till areas. A store better equipped to cater for its shoppers will ensure local shopping requirements continue to be locally and at a sequentially preferable, in centre location.
- 5.5.11 The Council's Retail Background Paper notes Bulwark Neighbourhood Centre is the largest of the County's neighbourhood centres. Delivery of an improved store should serve as a catalyst for further local development/employment opportunities and will likely boost investor confidence at the centre.
- 5.5.12 In practical terms, given Lidl currently operates a well-established and popular store a Bulwark Road significant change on wider shopping patterns are not anticipated.
- 5.5.13 By enhancing existing provision in the manner proposed, the centre will be better equipped to cater for local needs and, in turn, this may help counteract the propensity for shoppers to seek better facilities beyond the wider Chepstow area. It is thus logical and eminently sensible in

planning terms to seize the opportunity to enhance the Chepstow retail environment at an in-centre location. The application site is well established and is accessible by walking, cycling and public transport and accordingly considered an entirely appropriate location for additional retail investment.

- 5.5.14 Enhancing existing centres is important in bolstering the Chepstow role and function and increasing investor confidence. The delivery of an improved store, at a sequentially preferable location will increase the town's ability to meet consumer expectations and needs.
- 5.5.15 Lastly, it must also be noted that the population and local retail expenditure will grow in the period 2026 (and beyond), which will a) increase the need for improved local retail facilities to meet growing local needs and b) offset or mitigate the effects of new facilities on existing facilities over the same period.
- 5.5.16 Having regard to the role, function, and vitality and viability of existing centres, the impact of the proposed development on the vitality and viability and levels of turnover and trade are considered to be overwhelmingly positive.

5.6 Summary

- 5.6.1 In summary, the proposed development constitutes the delivery of an improved local foodstore within an existing centre. The enhanced store proposes an additional c.426sqm net floorspace and is well below the PPW floorspace threshold where typically an impact assessment is required.
- 5.6.2 A proportionate assessment has nevertheless been carried out which finds the improved store will generate an additional c.£12.6m of in-centre turnover in 2026. This should increase centre footfall, investor confidence and lead to subsequent knock on benefits for in centre turnover/trade.
- 5.6.3 Given Lidl's well-established existing trading position in Chepstow notable wider trading effects are not anticipated. The new store will be better equipped to meet existing local needs at what is an eminently sequentially preferable location.
- 5.6.4 Local population and retail expenditure will grow in the period 2026 (and beyond), which will a) increase the need for improved local retail facilities to meet growing local needs and b) offset or mitigate the effects of new facilities on existing facilities over the same period.

6.0 Non-retail Material Considerations

6.1 Introduction

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

- Principle of Development
- Sustainability
- Highways & Access
- Car Parking Provision
- Design & Landscaping
- Drainage
- Ecology
- Noise
- Geo-Environmental
- Trees
- Economic Benefits
- The Welsh Language

6.2 Principle of Development

6.2.1 The Monmouthshire LDP 2011 – 2021 Proposals Map indicates the site occupies a position inside the development boundary and therefore represents a highly sustainable location for development, within an established settlement pattern. Although the relevant LDP Policy S1 ‘The Spatial Distribution of New Housing Provision’ primarily relates to the siting of housing, the policy indicates the main focus for new development is within or adjoining the main towns of Abergavenny, Chepstow and Monmouth. Therefore, the siting of retail proposals within areas appropriate for, and in close proximity to future housing development is both logical and suitable. As highlighted above, the application site is situated within the Bulwark Neighbourhood Centre, as allocated under Policy RET3, which states “*development proposals for retail development (use class A1) in designated neighbourhood centres will be permitted provided that the development, either individually or cumulatively with other recent or proposed developments, does not undermine the vitality, attractiveness or viability of town or local centres*”. On this basis, the application site represents an entirely appropriate and suitable location for retail provision, as dictated by Policy RET3. To summarise, the application site is situated at highly sustainable

location within the Development Boundary and within a Neighbourhood Centre – establishing a robust principle of development for a retail uses at the application site.

6.3 Loss of Community Facility

6.3.1 As highlighted in the preceding policy context section, Policy S5 indicates development proposals that result in the unjustified loss of community and recreational facilities will not be permitted. Additionally, Policy CRF1 states *“The change of use or conversion to other uses neighbourhood or village shops, halls, public houses and other community facilities will only be permitted where:*

- a. The local community would continue to be adequately served by facilities to which there is easy and convenient access by means other than the private car;*
- b. There is evidence that the facility is not, and could not reasonably be expected to become, financially viable or the facility, if non-operational has been vacant for a substantial period of time; and*
- c. Genuine attempts at marketing the facility, whether in use or vacant, have been unsuccessful”*

6.3.2 A Building Survey Report has been prepared by Avison Young (April 2021) in support of the application. The Report indicates the application site has been unoccupied since its closure in October 2019. Since that time, the building has suffered from a lack of maintenance, vandalism and theft, leaving the property in a very poor condition. At the present, the application site remains vacant. The Dilapidated condition, fire safety breaches and disturbed asbestos to significant areas of the building make the building a significant H&S risk to occupants and access should be prohibited.

6.3.3 The Report considers the external fabric of the building is in a fair condition however roof repairs, cladding replacement and structural repairs are required in the short term. The internal fabric of the building is dilapidated, and all elements and finishes require removal and replacement. The Report finds the property to not be in a suitable condition or standard. In its current condition the majority of works noted within the report would be deemed as high risk as without undertaking these works the building cannot be occupied. To secure a re-let, significant refurbishment works would need to be undertaken at considerable expense. On this basis it is considered the property could not reasonably be expected to become financially viable in the immediate future, given the substantial repair and renovation costs evidenced in the Building Survey Report. Therefore, the proposals do not represent an unjustified loss of community facility and comply with the requisite policies CRF1 and S5.

6.4 Sustainability

6.4.1 It is considered the application site occupies an inherently sustainable location, with excellent links to surrounding settlements, established services and facilities and sustainable transport routes. As highlighted in the preceding sections, the site is located approximately 900 metres south of Chepstow town centre which offers a wide range of services and facilities. Additionally,

the site is located within the Bulwark Neighbourhood Centre which itself offers a range of services and facilities. Therefore, the development occupies a wholly sustainable location and complies with the principles of sustainable settlement patterns.

- 6.4.2 In terms of access to sustainable forms of public transport, the nearest bus stop adjoins the site's western boundary and provides access to the T7 and C1 routes which provide frequent services to Chepstow, Magor, Kingsdown and Thornwell. In terms of active travel, the site benefits from good pedestrian linkages, with pedestrian footpaths lining Bulwark Road. This enables comfortable and safe pedestrian access to the surrounding employment uses in the Bulwark Industrial Estate, nearby residential areas to the north and south and Pembroke Primary School to the east. In respect of cycling, the National Cycle Network Route 42 Chepstow – Glasbury is situated approximately 225 metres north of the site at Mathern Road. Additionally, Bulwark Road is identified as a Primary Future Cycling Route, with the nearest Primary Existing Cycling Route at Strongbow Road approximately 120 metres north of the site. The application site therefore benefits from excellent linkages to nearby active travel routes.
- 6.4.3 In summary, the proposed development site occupies a highly sustainable location, in close proximity to nearby services and facilities. Furthermore, the site is advantageously located to take advantage of excellent sustainable transport links, including public transport routes and active travel opportunities.

6.5 Highways and Access

- 6.5.1 A Transport Assessment has been prepared by Corrun Associates (June 2021) in support of the application and examines the highway and transportation issues associated with the proposed development.
- 6.5.2 Vehicular access is proposed via new formal priority junction location on the Bulwark Industrial Estate access road. The junction will be located approximately 50 metres east of the junction with Bulwark Road and will be designed to comply with local and national design guidance. Pedestrian access will also be provided at the new access junction with internal footways connecting directly into existing footpaths at the northern edge of the Bulwark Industrial Estate access road.
- 6.5.3 In respect of trip generation, the proposed development is predicted to generate an extra 51 two-way vehicular trips from the site during the weekday AM peak, and 44 two-way vehicular trips from the site during the weekday PM peak period. During a Saturday period the proposed development of the site is predicted to generate a maximum 210 increase in trips between 1100 and 1200. These values represent a 'worst case' scenario, and do not include any reductions expected as a result of secondary trip reductions which might be reasonably be expected to

account for at least 50% of all trips generated by the site. It is therefore concluded that the retail development will have a minor impact on weekday traffic flows on the local highway network.

- 6.5.4 Junction capacity assessments have identified that the proposed development would lead to very little impact across the surrounding highway network during the critical weekday AM and PM highway peak hours.
- 6.5.5 Although it has been identified that assessment junction J3 (Bulwark Road / A48 priority junction) would be expected to be operating over theoretical capacity in the weekday PM peak hour period within both the 2022 and 2027 forecast scenarios, this would be the case even in the 'Base' scenario with no development traffic. The addition of traffic from the proposed Lidl store at these junctions would lead to a minor decrease in junction performance, but this extra traffic is not the reason that the junction would be operating over capacity. Background traffic growth (Tempo), which may not occur in reality, is the main reason why the junction exceeds capacity. The actual number of primary trips generated by the proposed Lidl store will be negligible and therefore the impact on the highway network will be minimal.
- 6.5.6 In respect of highway safety, a review of the accident record has identified that on the wider highway network there are no apparent existing highway safety concerns. However, there are two localised pedestrian related accidents at the existing adjacent Zebra crossing, which require further investigation by the Local Highway Authority. The proposed development will generate minimal numbers of additional vehicular movements and will not have an adverse impact on the existing highway safety record.
- 6.5.7 To summarise, the Transport Assessment demonstrates that the development should be considered acceptable in respect of highways and transportation considerations. There are no identified highways and transportation matters that should preclude the granting of consent for the proposed scheme. The proposed development therefore adheres to Policy MV1 – 'Proposed Developments and Highway Considerations' of the adopted LDP.

6.6 Vehicle Parking

- 6.6.1 The proposed development will provide a dedicated customer car park and servicing area to facilitate the delivery of goods to the store. The proposed customer car park includes provision for 89 car parking spaces including 73 standard bays, 6 disabled bays, 9 parent and child bays and two electric vehicle charging bays. As highlighted above, the adopted Monmouthshire County Council Parking Standards SPG sets out the car parking requirements and indicates shops and small supermarkets between over 2,000 sqm require 3 commercial vehicle spaces and 1 space per 14 sqm.
- 6.6.2 The car parking provision provided is within the maximum guidelines identified by the adopted parking standards. The operator's extensive experience of demand at stores throughout the UK confirms that the proposed parking level is appropriate for the intended food store use. The

parking accumulation study, based on TRICS, also confirms that the proposed parking provision is suitable for the intended use, and will accommodate unusual peaks in demand.

6.6.3 This level of parking provision corresponds and complies with the requirements of Monmouthshire County Council Parking Standards SPG.

6.6.4 A total of 6 Sheffield cycle stands are included within the site proposals, which will allow parking for up to 12 bicycles. The proposed cycle parking is located in a prominent and convenient location to promote natural surveillance and are covered. This generous provision will help encourage this mode of travel, especially amongst staff.

6.7 Design & Landscaping

6.7.1 The application is accompanied by a Design and Access Statement (DAS) which explains the site, its surroundings, the design constraints and design rationale for the proposed development. The proposed development will be built in accordance with Lidl's contemporary specification, creating a bright, spacious sales area with full height glazing to the front elevation. The proposed elevations have been designed to provide activity and identity to the public frontages that respond to the geometry and site topography, whilst maintaining adequate clearances and separation and remain in keeping with the surrounding built environment. The elevations comprise white clad panels with grey rendered plinth beneath. A limited but coherent palette of materials is proposed to create visual consistency. Silver eaves guttering and rainwater pipers are utilised to complement the restrained palette. The west elevation facing Bulwark Road implements 4m glazing, adding natural light to the shopping environment and modernizing the visual appearance. Each elevation treatment responds to its specific context by utilising carefully selected robust and high-quality components. For reference, a full palette of materials is set out in the accompanying Design and Access Statement.

6.7.2 The perimeter landscaping and landscaped area frame the proposed foodstore, adding visual interest and softening the schemes appearance. For detailed landscaping proposals please refer to drawing no. 173 CA 2021 CPW-03 – Landscape Proposals.

6.7.3 In summary, the proposed development will provide a contemporary shopping environment that compliments and enhances the site's immediate surroundings. It is considered the proposed development fully complies with Policy DES 1 – General Design Considerations of the LDP.

6.8 Drainage

6.8.1 A Drainage Strategy has been prepared by Smart Associates in support of the planning application, in accordance with statutory standards for SuDS. Infiltration testing has been undertaken in accordance with BRE 365 and has been proven infiltration is viable. Surface water will be attenuated on site using infiltrating systems to 1 in 100 year plus 30% rainfall event.

6.8.2 The proposed development will benefit from an infiltrating permeable car parking area, alongside two rain gardens in the north west corner of the site. The catchment of the car park will be collected and treated using an infiltrating permeable paving/tarmac system. Flows will be treated

by means of the joints/voids and stone subgrade system. During rainfall events the system will fill and utilise the sub base storage whilst being infiltrated to the ground. Catchment of the rain garden will be treated by enhanced soils, membranes and stone surround.

- 6.8.3 The surface water features utilised as part of the scheme are linked in order to maximise storage and have been designed to attenuate for all 1 in 30 and 1 in 100 year rain fall events plus 30% climate change allowance. A 10% creep allowance has also been applied. Foul flows will be disposed of by means of the existing foul connection to the Dwr Cymru system. A Marshalls Grass Guard infiltration trench system is utilised in the north of the site, adjoining the proposed store's northern elevation. Additionally, a free draining decorative stone finish is employed beyond the servicing access ramp.
- 6.8.4 Further details of the Drainage Strategy can be viewed on drawing 7844 304 Rev A – Proposed Drainage Layout. In summary, the proposed development has incorporated SuDS features in accordance with LDP Policy SD4 – 'Sustainable Drainage'.

6.9 Ecology

- 6.9.1 A Preliminary Ecological Appraisal and Roost Assessment Report (April 2021) has been prepared by Wildwood Ecology in support of the application. The report indicates the existing building contains a number of potential roost features and is classified as having moderate suitability to support roosting bats. In the absence of mitigation, demolition of the building may have a negative impact on roosting bats and birds. Additionally, the use of unmitigated new lighting may adversely impact local bat populations if they use the site habitats.
- 6.9.2 The report provides recommendations to undertake further bat surveys to determine the presence or absence of roosting bats, which is currently being undertaken. In respect of nesting birds, all vegetation clearance and demolition works should be undertaken outside of nesting birds season. Alternatively, a nesting bird check is required to identify the presence or absence of nesting birds. Considering other forms of fauna, excavations should be covered overnight to ensure mammals do not enter or get trapped. The excavations should be provided with a means of escape for wildlife, whilst chemicals, fuel or materials should be safely stored away from animal access.
- 6.9.3 Providing the recommendations of the report are successfully implemented, it should be possible for the development to proceed and for there to be no long-term impacts upon the key protected species present at the site.

6.10 Noise

- 6.10.1 A Noise Impact Assessment was prepared by Hydrock in May 2021. The report provides an assessment of noise that may arise from the delivery bay, car park and any fixed plant and services associated with the operation of the proposed foodstore. The report finds that operational noise from the delivery bay is predicted to exceed existing background sound levels and BS8233:2014 internal noise criteria at the closest existing dwellings. It is recommended that mitigation is incorporated via a Quiet Delivery System to reduce noise from the delivery bay to be

considered a low impact, in accordance with BS4142:2014 and BS8233:2014. Noise from the car park of traffic on the local network is not expected to cause any adverse impact. Limits have been proposed for the control of noise from fixed plant and services associated with the proposed development.

6.11 Geo-Environmental

- 6.11.1 A Phase 1 Preliminary Risk Assessment was undertaken by Remada (December 2020) in support of the application. The assessment sought to present a preliminary conceptual site model to identify plausible pollutant linkages as a preliminary risk assessment and to provide recommendations for subsequent investigations. In respect of geology / hydrology, published geological maps record that the site is directly underlain by the Mercia Mudstone Group, designated as a Principal Aquifer. The site is not located within an area which may be affected by coal mining activity. The desk study identifies a number of on-site and off-site potential sources of contamination that require further investigation. It is therefore recommended that a ground investigation is undertaken to enable preliminary foundation design.
- 6.11.2 A Phase 2 Ground Investigation was undertaken by Remada (February 2021) in support of the application. The Investigation recommends either pad foundation or stiffened raft down stands bearing directly on the limestone encountered at circa one metre depth is considered a suitable foundation solution. Removal and recompaction of the existing shallow made ground as observed outside the existing footprint may provide a suitable formation for a ground bearing floor slab if correctly engineered. In the event that deeper made ground is encountered following demolition of the existing building, proposed foundations should be deepened as necessary to bear on the underlying bedrock.
- 6.11.3 In respect of floor levels, the report indicates It is important that any voids resulting from the removal of existing foundations are compacted to an appropriate engineering standard prior to the construction of the raft foundation or ground bearing floor slab.
- 6.11.4 Due to the identification of chrysotile asbestos cement at a concentration of 0.059% in made ground at WS8 it is recommended that an asbestos risk assessment is undertaken prior to the commencement of redevelopment works.
- 6.11.5 In respect of ground gas, the report indicates the results of four rounds of gas monitoring visits placed the site into Characteristic Situation 1 and therefore ground gas protection measures will not be required within the proposed buildings. The site is located within an Intermediate Probability Radon Area and as such, basic radon protection measures are required. A radon / ground gas membrane will need to be installed.

6.12 Trees

- 6.12.1 A Pre-Development Tree Survey & Assessment was prepared by Tirlun Design Associates (April 2021) in support of the application. The report presents the position, dimensions, condition and future life expectancy of existing trees on site alongside recommendations of arboricultural works

which should be undertaken. The survey observed a total of 5 no. individual trees and 1 no. tree group at the application site. Of the individual trees 2 no. were assessed as Category B (moderate quality and value) and 3 no. were assessed as Category U (unsuitable for retention). Of the tree groups, G1 was assessed as Category U (unsuitable for retention). The site does not contain any trees of particular note.

- 6.12.2 A Tree Constraints Plan has also been prepared by Tirlun Design Associates (April 2021) in support of the application. The purpose of the Tree Constraints Plan is to provide a record of the above and below ground constraints presented by the existing retained trees. These constraints are illustrated by drawing no. TDA.2613.02 which shows the locations and assessed category of retained trees together with their crown spread, root protection areas (RPA) and shadow patterns.
- 6.12.3 The development proposals will seek to include adequate space between existing trees and new structures to avoid any future management conflicts/issues.

6.13 Economic Benefits

- 6.13.1 TAN 23 defines economic development broadly so that it includes any form of development that generates wealth, jobs and income. TAN 23 states the economic benefits of proposals and market needs should be fully considered when determining planning applications (paragraphs 1.2.1-2).
- 6.13.2 PPW recognises the role that retailing plays in supporting the economy. In PPW economic development is defined as the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes (paragraph 5.4.1). Economic land uses include the traditional employment land uses (offices, research and development, industry and warehousing), as well as uses such as retail, tourism, and public services (paragraph 5.4.2).
- 6.13.3 Existing jobs from the established Lidl store will be transferred with the prospect of further job opportunities in the new larger store, with up to 40 overall jobs being made available.

6.14 The Welsh Language

- 6.14.1 The store will seek to make provision for Lidl Welsh language features such as store signage to be provided as with the existing store.

7.0 Conclusion

7.1.1 This planning and retail statement has been prepared by Tetra Tech Planning on behalf of the applicant, Lidl Great Britain Ltd., in support of a full planning application to be submitted to Monmouthshire County Council for the for the demolition of the former Severn Bridge Social Club and erection of a supermarket, car parking, landscaping and all associated works at the former Severn Bridge Social Club, Bulwark Road, Chepstow.

7.1.2 In light of the above findings we make the following conclusions:

- Lidl's existing store (situated a short distance to the south of the application site) is too small to meet the demands of customers. There is no potential on the site to expand, and the application site provides an opportunity to secure this.
- The application site is situated within the Development Boundary and within a Neighbourhood Centre – establishing a robust principle of development for retail uses at the application site. On this basis, the application site represents an entirely appropriate and suitable location for retail provision, as dictated by Policy RET3.
- The application site has been unoccupied since its closure in October 2019. Since that time, the building has suffered from a lack of maintenance, vandalism and theft, leaving the property in a very poor condition. It is considered the property could not reasonably be expected to become financially viable in the immediate future, given the substantial repair and renovation costs evidenced in the Building Survey Report. Therefore, the proposals do not represent an unjustified loss of community facility and comply with the requisite policies CRF1 and S5.
- In respect of sustainability, the proposed development site occupies a highly sustainable location, in close proximity to nearby services and facilities. Furthermore, the site is advantageously located to take advantage of excellent sustainable transport links, including public transport routes and active travel opportunities
- The proposed development seeks to deliver a retail development within a defined commercial centre (as defined in the adopted LDP). Hence, the application site is sequentially preferable. The proposed development is considered, therefore, to fully accord with local and national policy and guidance outlined in PPW, TAN 4 and the LDP with respect to the sequential approach.
- The proposed development constitutes the delivery of an improved local foodstore within an existing centre. The enhanced store proposes an additional c.426sqm net floorspace and is well below the PPW floorspace threshold where typically an impact assessment is required. A proportionate assessment has nevertheless been carried out which finds the improved store will generate an additional c.£12.6m of in-centre turnover in 2026. This should increase centre

footfall, investor confidence and lead to subsequent knock on benefits for in centre turnover/trade.

- Given Lidl's well-established existing trading position in Chepstow notable wider trading effects are not anticipated. The new store will be better equipped to meet existing local needs at what is an eminently sequentially preferable location. Local population and retail expenditure will grow in the period 2026 (and beyond), which will a) increase the need for improved local retail facilities to meet growing local needs and b) offset or mitigate the effects of new facilities on existing facilities over the same period.

7.1.3 The proposal is considered acceptable in all other technical aspects including accessibility/car parking; flood risk and drainage; ecological impact; design and landscaping.

7.1.4 The proposed development's accordance with planning policy at all levels provides an overall balance of consideration which weighs firmly in favour of permitting the current proposals without delay.

