

Planning & Retail Statement

Milford Haven

Lidl Great Britain Ltd

DRAFT

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Prepared on Behalf of Tetra Tech Planning

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1. Introduction & Background

1.1 Background

1.1.1 Lidl is currently represented in Milford Haven at its existing store at Great North Road. The existing Lidl store is a small and of an early generation format. 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. On this basis it is proposed to demolish the existing foodstore and adjoining properties to the north, and develop a new Lidl foodstore on an expanded site at Great North Road, Milford Haven, which includes the existing Lidl site alongside the adjoining Enterprise car rental site and 3 no. residential properties at 61, 61A & 61B Great North Road.

1.2 Introduction

1.2.1 This Planning & Retail Statement has been prepared by Tetra Tech Planning on behalf of the applicants Lidl Great Britain Ltd and provides the planning and retail justification in support of a full planning application to be submitted to Pembrokeshire County Council for the demolition of the existing Lidl foodstore and the erection of a new Lidl foodstore, access, car parking, landscaping and all associated works at Lidl, Great North Road, Milford Haven. The re-build of the foodstore will provide an enhanced sales area of 1,399 sqm.

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 health of existing nearby designated centres;
- Section 5: considers matters concerning retail need;
- Section 6: considers the application of the sequential approach to site selection;
- Section 7: assesses the retail impact of the proposed development;
- Section 8: considers non-retail material considerations; and
- Section 9: provides a summary of conclusions

2. The Proposed Development

2.1 Site Description & Surroundings

2.1.1 The Application Site is located off Great North Road/A4076 in Milford Haven, Pembrokeshire, situated approximately 0.5 km north east of Milford Haven Town Centre. The application site extends to approximately 0.7 Ha and currently comprises the existing Lidl foodstore (including car parking area) and a series of adjoining properties to the north of the foodstore, which include an Enterprise Rental Car premises and 3 no. residential dwellings at 61, 61A & 61B Great North Road. The application site is accessed directly from Great North Road/A4076, which runs parallel to the site's eastern border.

2.1.2 In respect of surroundings, the application site is set in a primarily residential locality. Residential dwellings adjoin the site's borders on all aspects; at Vaynor Road (to the west & north), Great North Road (to the east) and Greville Road (to the south). A petrol filling station immediately adjoins the site to the south.

2.2 Planning History

2.2.1 A search of the Pembrokeshire County Council online planning register identified the following historical planning applications at the subject site:

Application Ref.	Proposal	Decision
Lidl Foodstore, Great North Road		
06/0808/PA	Proposed store extension and associated alterations.	Granted – 16 th Jan. 2007
07/0888/AD	Erection of a sign	Granted – 7 th Nov. 2007
08/0111/AD	Erection of a illuminated sign	Granted – 20 th Jun. 2008
11/1050/AD	Erection of 2 noo-illuminated hoarding signs	Granted – 21 st Mar. 2012
16/0512/AD	Replacement of existing flag pole with 7.5m high totem sign	Granted – 14 th Oct. 2016
61 Great North Road		
97/0938/PA	Change Of Use From Redundant Shop To Domestic Garage	Granted – 27 th Apr. 1998
03/0941/PA	Photographers studio (in retrospect)	Granted – 11 th Feb 2004
05/0835/PA	Garage adj. to, 61 - Change of use from garage to vehicle rental offices & forecourt	Granted – 25 th Nov. 2005
12/0176/PA	Conversion of redundant shop to dwelling	Granted – 19 th Jul. 2012

2.3 The Proposed Development

- 2.3.1 The proposed development comprises the demolition of the existing Lidl foodstore and adjoining properties to the north of the foodstore (Enterprise Rental Car and 61, 61A & 61B North Road) and the erection of a new Lidl foodstore, access, car parking, landscaping and all associated works. The proposed foodstore will be a single storey in height, having a Gross External Area of (GEA) of 2121 sqm. The foodstore will provide a net sales area of 1399 sqm, together with a warehouse area and ancillary/welfare areas.
- 2.3.2 A repositioned access will be created from Great North Road to serve the proposed foodstore. Pedestrian access and linkages to the store entrance are proposed from the site's eastern 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 development is outlined in detail in the accompanying Design and Access Statement.

3. Planning Policy Context

3.1 Local Level Policy

3.1.1 Section 70(2) of the Town and Country Planning Act stipulates in respect of the determination of planning applications:

“In dealing with such an application the authority shall have regard to the provisions of the development plan, so far as material to the application, and to other material considerations”.

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 statutory development plan for the purposes of this application is the National Development Framework for Wales (“Future Wales: The National Plan 2040”) and the Pembrokeshire Local Development Plan (adopted 2013) (“LDP”). Material considerations in this case include national policy in the form of Planning Policy Wales (PPW) Edition 11 (2021), the supporting Technical Advice Notes (TANs) and adopted Supplementary Planning Guidance (SPGs).

Future Wales: The National Plan 2040

3.1.4 Future Wales is the national development framework for Wales and sets the direction for development up to 2040. As the national development framework, Future Wales is the highest tier of development plan. It is a framework which will be built on by Strategic Development Plans at a regional level and Local Development Plans at local authority level. Planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole. Future Wales replaces the Wales Spatial Plan. The specific purpose of Future Wales is to ensure the planning system at all levels is consistent with, and supports the delivery of, Welsh Government strategic aims and policies.

3.1.5 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 proposals are now discussed.

3.1.6 Policy 1 – ‘Where Wales will grow’ indicates the Welsh Government supports sustainable growth in all parts of Wales. Milford Haven 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”.

3.1.7 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.

Pembrokeshire Local Development Plan

3.1.8 The adopted development plan is the Pembrokeshire County Council Local Development Plan (adopted February 2013). The LDP sets out the planning policies in the county borough over the plan period up to 2021. The LDP Proposals Map indicates the application site is not allocated for a specific use within the LDP and therefore constitutes 'white land'. In retail policy terms, the application site is not located within a designated retail centre and therefore occupies an 'out-of-centre' location. The policies of relevance to the proposed development are now discussed in further detail below.

3.1.9 Policy SP1 – 'Sustainable Development' indicates that all development proposals must demonstrate how positive economic, social and environmental impacts will be achieved and adverse impacts minimised.

3.1.10 Policy SP4 – 'Promoting Retail Development' identifies Milford Haven as a town centre within the retail hierarchy. All new retail and leisure development should be consistent in scale and nature with the size and character of the Centre and its role in the retail hierarchy. Proposals which undermine the retail hierarchy will not be permitted.

3.1.11 Policy SP12 – 'The Settlement Hierarchy' identified Milford Haven as a Hub Town.

3.1.12 Policy SP13 – 'Settlement Boundaries' indicates settlement boundaries define the areas within which development opportunities may be appropriate. Within Hub Towns, boundaries define the physical, functional and visual extent of the settlement, ensuring that development takes place in sustainable locations.

3.1.13 Policy SP14 – 'Hub Towns' indicates development will encourage communities and complementary relationships between the Towns by promoting each of the following:

1. Development in locations which support and reinforce the roles of the towns within the Hubs;
2. High quality accommodation that supports diversity in the residential market;
3. Opportunities for new commercial, retail, tourism, leisure and community facilities;
4. Appropriate land uses which are well-related to a Settlement Boundary; and
5. Accessibility to services by a range of sustainable modes of transport.

3.1.14 Policy GN.1 – 'General Development Policy' provides a comprehensive criterion for new development and includes (inter alia) considerations such as:

- The location, siting and scale of proposals and their compatibility with the character of the area;
- Impacts upon local amenity in terms of visual impact, loss of light, privacy etc;
- The impact upon landscape character;
- The impact upon the natural environment including protected habitats and species;
- The accessibility of the proposed site location, the impact upon highway safety and the ability to incorporate sustainable transport and accessibility principles
- The impact on health and safety;
- Provide appropriate services, access and car parking.

3.1.15 Policy GN.2 – ‘Sustainable Design’ provides a comprehensive design criteria and indicates development will be permitted where (inter alia): it is of a good design which pays regard to local distinctiveness; is appropriate to local character; is resource efficient and climate responsive; achieves flexible and adaptable design; creates an inclusive and accessible environment; provides good quality public realm and provides well designed outdoor space.

3.1.16 Policy GN.3 – ‘Infrastructure and New Development’ indicates Where development generates a directly related need for new or improved infrastructure, services or community facilities and this is not already programmed by a service or infrastructure company, then this must be funded by the development.

3.1.17 Policy GN.14 – ‘Major Out-of-Town Centre Development’ indicates proposals for major retail development outside of the defined Town Centre boundaries will only be permitted where:

1. The development would not undermine the retail hierarchy set out in the Strategic Policies; and
2. The development either by itself or in combination with other permitted or allocated retail development would not undermine the vitality and viability of any of the Town Centres or Local Retail Centres.

3.1.18 The supporting policy text indicates in Pembrokeshire, modest scale development can have a significant impact on the vitality and viability of existing centres. For this reason a retail impact assessment will generally be required for developments above 500 sqm net.

3.1.19 Policy GN.37 – ‘Protection and Enhancement of Biodiversity’ indicates all development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity.

3.2 National Level Policy

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

3.2.1 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 socioeconomic 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.

3.2.2 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”.

3.2.3 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)

3.2.4 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”.

- 3.2.5 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”.
- 3.2.6 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”.
- 3.2.7 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

3.2.8 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”.

3.2.9 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 wellbeing. It is for developers and planning authorities to identify these opportunities and act upon them”.

Retail Policy

3.2.10 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.

3.2.11 Paragraph 4.3.3 states the planning system must:

- promote viable urban and rural retail and commercial centres as the most sustainable locations to live, work, shop, socialise and conduct business;
- sustain and enhance retail and commercial centres’ vibrancy, viability and attractiveness; and
- improve access to, and within, retail and commercial centres by all modes of transport, prioritising walking, cycling and public transport.

3.2.12 Paragraph 4.3.10 states that Planning authorities should establish a hierarchy of retail and commercial centres in their development plan strategy, identifying boundaries on the proposals map.

3.2.13 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”.

Economic Development Policy

3.2.14 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”.

3.2.15 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.

3.3 Other Considerations

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

3.3.2 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”.

3.3.3 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”.

3.3.4 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 ‘placemaking’, as advocated by PPW 10, at the heart of the recovery process.

Supplementary Planning Guidance

3.3.5 Parking Standards Supplementary Planning Guidance (Adopted June 2013)

3.3.6 The SPG document builds on specific Development Plan policies, providing advice on Parking Standards for new development. The Parking Standards SPG indicates the application site is located within parking zone 1 – Towns. The SPG states supermarkets and superstores larger

than 2000m² in size have an operational requirement of 3 commercial vehicle spaces and a non-operational requirement of 1 space per 14m².

Technical Advice Notes (TANs)

3.3.7 Technical Advice Note 4: Retail and Commercial Development 2016

3.3.8 TAN 4 explains that retail developments comprising over 2,500sqm gross floor space should be supported by an impact assessment. 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, for example:

- Impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area.
- Impact of the proposal on centre vitality and viability, including local consumer choice and range and quality of the comparison and convenience retail offer.
- Consideration of the cumulative effects of the development proposal in relation to any outstanding planning permissions.
- The impact of the proposal on allocated sites outside centres being developed in accordance with the development plan.
- Impact of the proposal on in centre trade and turnover in the centre and other centres in the wider area, taking account of current and future consumer expenditure capacity in the catchment area.
- Assessment of the proportion of customers using the development traveling by different modes of transport.
- Impact on travel patterns over the catchment area.
- Any significant environmental impacts.

Technical Advice Note 18: Transport 2016

3.3.9 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.

3.3.10 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”.

- 3.3.11 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

- 3.3.12 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.
- 3.3.13 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”.
- 3.3.14 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.”

Pembrokeshire Retail Study

- 3.3.15 The retail study proposes a five tier hierarchy, in which Milford Haven is ‘Level Three’- alongside Fishguard and Narberth. Milford Haven is clearly a popular shopping destination for both local residents and tourists but the evidence suggests that the out-of-centre retail park and Marina development are the greatest draws.
- 3.3.16 For convenience goods there is no Pembrokeshire-wide forecast capacity to support new convenience floorspace as a result of committed convenience development; namely planned foodstores in Haverfordwest (Sainsbury’s), Pembroke Dock (Aldi) and Milford Haven (unconfirmed operator) and other planned floorspace.
- 3.3.17 In terms of accommodating growth in Milford Haven, the Retail Study states that no capacity is identified for new retail floorspace after taking account of the development at Milford Haven Marina. The centre is not considered to be a particularly strong retail centre, which is evident from the market share analysis with out of centre food stores serving Milford Haven are achieving a considerably higher market share than stores in the town centre. The town centre health check also confirms that Milford Haven Town Centre is struggling, particularly in terms of its retail function. Demand for new retail in Milford Haven is likely to be limited due to the proximity of Haverfordwest and its out of centre shopping offer, as well as out of centre shopping facilities in

Pembroke Dock. Investment in the centre is critical and while the Marina offers the potential to develop Milford Haven's tourism economy, potential opportunities to promote the town centre should be supported. This could involve diversifying the offer towards the leisure sector or seeking to develop a specialist, complementary retail offer, for example antique sales.

4. Assessment of Existing Retail Provision

4.1 Introduction

4.1.1 This section of the assessment presents an analysis of the vitality and viability of the surrounding centres which lie in close proximity to the application site. The following analysis draws upon established sources of retail data (such as Experian GOAD reports); the South West Wales Regional Retail Study (2017); the Retail and Commercial Background Paper (2019); Pembrokeshire Retail Survey Data (2020); and our own site visits/surveys (August 2021) and observations.

4.2 Milford Haven Town Centre

4.2.1 Milford Haven is a town in the county of Pembrokeshire, South West Wales; with an estimated population of 12,830. The town occupies a waterfront location, on the north side of the Milford Haven Waterway. The Pembrokeshire Local Development Plan (adopted 28th February 2013) identifies Milford Haven as a 'Hub Town' within the settlement hierarchy and a 'Town Centre' within the retail hierarchy. Milford Haven Town Centre comprises two distinct parts; the older area - which is concentrated along two parallel roads and follows a grid format that is set back from the waterfront, alongside a newer marina area - which sits below the older area and runs in a linear form, immediately adjoining the waterfront. The designated centre is primarily formed by Charles Street, Hamilton Terrace, Dartmouth Street, Priory Street and Nelson Quay.

4.3 Retailer Representation

4.3.1 The number of national multiples within a town centre can provide a good indication of its relative strength. Milford Haven town centre benefits from a range of both local independents and national multiples. National multiples with stores in the centre include; Coral, Betfred, Nationwide Building Society & Greggs.

4.3.2 This offering of national multiples is complemented by a strong collection of independent retailers including; Kirin Palace, Sandro's Barbers, Solo Laundry, The Window, The Lord Kitchener Public House, The White Butterfly Café, Essence of India, Trendz, New Garden, Mojoes Bar, Roxanne's Hairdressing, Woofers Pet Shop, Hamilton's Public House, Milford Chemist, Jeffrey's Jeweller, R.K. Lucas & Son, West Wales Properties & The Amber Café.

4.4 Diversity of Uses

4.4.1 Tetra Tech Planning has investigated the composition of the centre based on the extent of the town centre outlined by Experian Goad. A Goad plan (updated by Tetra Tech Planning in August 2021) is attached at **Appendix 1** for reference. It should be noted that the GOAD survey area directly relates to the town centre area defined by the LDP (as is commonly the case). A breakdown of units is set out in the table below:

Type of Unit	January 2021	UK Average
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	No. Units	% Total	June 2021 %
Convenience	7	5	9%
Comparison	26	21	27%
Retail Services	15	12	15%
Leisure Services	30	24	24%
Financial & Business Services	10	8	9%
Vacant	33	27	14%
Total	121	100	100%

Table 1: Diversity of Uses Source – Experian GOAD

- 4.4.2 The convenience sector numbers 7 units, representing 5% of the centre. This level of provision is below the national average of 9%.
- 4.4.3 The comparison sector accounts for 26 units. This level of provision accounts for 21% of the centre and operates 6% below the national average of 27%.
- 4.4.4 The retail service sector represents 12% of the centre, numbering 15 units in total. The sector operates at a level consistent with the national average of 15%.
- 4.4.5 The leisure services sector represents 24% of the centre, accounting for 30 units. This level of provision is consistent with the national average of 24%.
- 4.4.6 The financial and business services sector represents 8% of the centre, accounting for 10 units. This level of provision operates 1% below the national average of 9%.

4.5 Vacancies

- 4.5.1 Vacant units account for 27% of Milford Haven Town Centre, equivalent to 33 units. The level of vacancies operates at a level 13% above the national average of 14%, with vacant units generally well dispersed in the centre.

4.6 Accessibility

- 4.6.1 The centre is highly accessible and served by sustainable modes of public transport including numerous bus stops located within the town centre; including stops at Hamilton Terrace, Milford Town Hall and Market Square which provide access to the 302 - Withybush, 300 – Hubberston, 356 – Pembroke Dock & 315 - Haverfordwest services. Milford Haven train station is located approximately 250 metres north west of the town centre and provides frequent services to regional and national destinations, including Haverfordwest, Carmarthen, Swansea, Cardiff, Newport & Manchester.
- 4.6.2 The centre is also highly accessible via private car, with the A4076 providing links north to Haverfordwest and the A40. The centre is served by a high level of car parking provision, including surface level car parks at Dartmouth Street, Robert Street and Fluke Street, In summary, the centre is regarded as easily accessible to shoppers using a variety of transport modes.

4.7 Pedestrian Flows

- 4.7.1 Pedestrian flows can provide a good indicator of the strength of a centre. At the time of Tetra Tech Planning's survey (weekday mid-morning) high levels of activity were observed within the core of the town centre. High levels of footfall were observed at Charles Street and Hamilton Street.
- 4.7.2 Lower levels of pedestrian activity were observed at Fluke Street and Francis Street , potentially due to their peripheral location or less active retail frontages.
- 4.7.3 Pedestrian accessibility in the traditional town centre areas of Hamilton Terrace and Charles Street is good, with no major impediments. However, the older areas of the town centre are poorly linked to the newer Milford Marina development.

4.8 Environmental Quality

- 4.8.1 Generally, shopfronts and building facades are well maintained throughout the centre. Areas of public space including those adjoining Charles Street & Hamilton Terrace are well kept, clean and tidy. The quality of the central retail area is generally good with evidence of recent investment in the street scene and public realm. The centre is perceived as a safe and pleasant shopping environment, adding to the vitality of public areas in the town centre.

4.9 Summary

- 4.9.1 Milford Haven town centre is considered to be buoyant and performing to an adequate level, with a representation of national multiples and a comprehensive offering of independent retailers. Although vacancies are observed to be above national averages, the centre benefits from a healthy mix of retail and services uses. The centre is accessible by a variety of transport modes, with good levels of car parking provision. The public realm throughout the town is of a good quality, kept clean and tidy and free from litter and graffiti, adding to the overall shopping experience. In summary, it is a vital and vibrant centre with no obvious signs of any particular weakness or vulnerability.

5. Need for the Proposed Development

5.1 Introduction

- 5.1.1 This section of the report assesses the retail 'need' for the development, in accordance with guidance provided in PPW, TAN 4 and the adopted LDP. It should be noted from the outset of this section that the proposed development constitutes the redevelopment of existing Lidl store, albeit a larger premises; one that is better equipped to meet local retail customers' needs. As such the existing store is already playing an important role in helping to meet existing local retail need; this need will continue to be met by the proposed new store. The demonstration of need for the extant floorspace is therefore not considered necessary. Instead, this chapter focuses on the proposed uplift or 'new' floorspace being delivered at the new foodstore i.e. c.483sqm net.
- 5.1.2 The Welsh Government does not prescribe any particular methodology for undertaking need assessments and it is up to each local planning authority to be satisfied with quantitative retail need evidence in policy making or the development management process. Local planning authorities and developers should therefore ensure assessments are prepared in a clear, logical and transparent way with the use of robust and realistic evidence. (para 6.3, TAN4).
- 5.1.3 There are two acknowledged indicators of need: quantitative need – a statistical/numerical based assessment of need for additional floorspace; and qualitative need – an assessment of other non-numerical considerations. Qualitative considerations can include (but are not limited to) addressing issues associated with overtrading, improving accessibility, widening choice of facilities and the redistribution of trade. Weight given to qualitative need is dependent on local circumstances.
- 5.1.4 Whilst an element of precedence is apportioned to quantitative need in PPW, it states that qualitative need and other factors are material considerations when considering need, with the weight apportioned being a matter for the decision-maker in each individual case. It is within the gift of the decision maker to apportion weight to qualitative indicators of need and other material considerations.

5.2 Quantitative capacity

- 5.2.1 Based on the findings of the Council's retail evidence provided by the South West Wales Regional Retail Study 2017, the below table provides simple convenience expenditure capacity analysis within the PCA at 2026 i.e. the design year of the proposed store.

Table 2: Capacity for additional convenience floorspace to 2026, Milford Haven (Zone 4)

	2021	2026
[1] Available Convenience Expenditure in PCA (Zone 4 Milford Haven) (£m)	39.2	38.9
[2] PCA derived turnover of existing stores in PCA (Zone 4) (£m)	21.0	20.9
[3] PCA derived turnover of proposed development (£m)		4.3
[4] PCA derived Turnover of Convenience Retail Commitments in PCA (£m)		12.0
[5] Total PCA turnover (£m)	21.0	37.1
[6a] PCA convenience expenditure capacity (£m)	18.2	1.8

Notes

[1] taken from table 2 & 4 of Appendix 5 of SWW Regional RS 2017

[2] derived from table 2 & 4 Appendix 5 of SWW Regional RS 2017. Total Milford Haven derived turnover

[3] taken from table 6 at Appendix 2

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

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

5.2.2 In short, the above table, also provided at Appendix 2, outlines a comparative assessment of the available convenience expenditure in the Primary Catchment Area (i.e. Zone 4 (Milford Haven) of the SWW Regional Retail Study 2017) against the PCA (Zone 4) derived turnovers of existing stores, to help identify whether there is ‘capacity’ within Zone 4 to accommodate the proposed additional floorspace at the proposed store in 2026.

5.2.3 It can be seen from the above table, the SWW Regional Retail Study finds existing stores are anticipated to draw turnover of c.£20.9m from PCA based residents, compared to an available expenditure of c.£38.9m. This indicates a proportion of available expenditure in the PCA will continue to ‘outflow’; that is, be spent beyond the PCA i.e. in an unsustainable manner. It indicates there is ‘capacity’ for additional floorspace in the PCA to meet this available expenditure and crucially increase Milford Haven’s self-containment. It is entirely sensible therefore that a modest quantum of additional floorspace is provided at an already well established, but better equipped store, such as that proposed, to meet this identified need. The table shows through the additional provision of floorspace within the PCA the local market share of expenditure will be increased to a more sustainable level.

5.3 Qualitative Considerations

5.3.1 Qualitative need is also an important consideration. It reflects the increasing recognition of the wider economic, social and environmental considerations in determining planning applications for

retail proposals. It is of particular relevance in securing accessible, efficient, competitive and innovative retail provision which, in turn will allow increased investment and stimulate job creation.

- 5.3.2 Qualitative need considerations can include (but are not limited to) addressing issues associated with existing store operational inefficiencies/ deficiencies, improving accessibility and counteracting unsustainable shopping patterns.
- 5.3.3 When considering 'need' it is crucial to note in this instance that the proposal does not propose an entirely new operator, but seeks to deliver an improved local store for an existing operator in Milford Haven; one which is long-standing and already well-established within the locality. The existing store has been trading for many years; it is popular and heavily relied upon by the local community. The fact that Lidl is taking the significant commercial investment decision to purchase the adjacent site in order to deliver an improved premises and wider site is, itself, a very strong indication itself of a) the strength of the existing customer base; b) the importance of the store in meeting local needs; and c) the pressing need for enhanced premises.

Meeting local consumer need

- 5.3.4 Lidl's existing Milford Haven store is one of Lidl's "first generation" stores. The operational and customer requirements were very different then than they are today. Lidl (and the store's) growing popularity since first opening means the store as currently sized and arranged is no longer fit for purpose; it is no longer able to accommodate Lidl's operational format which has evolved over the years as the company's popularity has grown.
- 5.3.5 Lidl's growing popularity means the existing store is no longer capable of meeting local consumer demand. The level of customers shopping at the store is leading to store operational issues e.g. store replenishment and car parking demand. The rationale for the proposed store is clear; an improved store is required to ably meet local need. Obtaining planning consent will ensure that Lidl continues to be able to suitably serve local needs from what is a well-established existing retail destination. The enhanced store will help relieve pressures and improve store operations. Overall, an improved customer experience will be achieved.
- 5.3.6 It is important to note the smaller format Limited Assortment Discounters (LAD) such as Lidl operate from far smaller stores than is typical of the large format 'big four' operators. It is now widely accepted that smaller format LADs have become increasingly popular in the last decade. This popularity and the smaller scaled store portfolio can lead to operational and logistical challenges in seeking to adequately service each store's established (and growing) customer base. Whilst the adequacy of existing provision is often assessed by local authorities in quantitative capacity terms, the effect of the increasing popularity of existing LADs and the qualitative issues that arise are typically overlooked. In scenarios such as this, where customer demand means the smaller, "first generation" Lidl stores are no longer capable of meeting local need, Lidl typically seeks to deliver enhanced stores, ideally at the existing site as currently proposed. This is to alleviate operational pressures and 'decongest' existing stores. This will

ensure a high level of customer experience can be maintained at Great North Road, Milford Haven.

- 5.3.7 At 1,882sqm net in total the proposed store remains modestly scaled by supermarket standards. Notwithstanding this, it comprises the latest generation of Lidl store, providing ancillary staff/welfare facilities, bakery area, manager's office and customer toilets etc. Its delivery will be of direct benefit to both staff and customers alike. The store and site layout is more spacious than the existing store to be replaced and is better equipped to cater for its shoppers.
- 5.3.8 Chapter 10 of PPW advises that wherever possible retail provision should be located in proximity to other commercial businesses, facilities for leisure, community facilities and employment. Whilst out of centre, this location is well-established and popular as a retail destination. This 'symbiosis' may not be able to be replicated elsewhere if permission was withheld. The proposals seek to make the most efficient use of a longstanding existing retail destination. Delivery of an improved store should serve as a catalyst for further local development and will likely boost investor confidence.

Counteract unsustainable shopping patterns

- 5.3.9 As outlined above the proposed store seeks to ensure local shopping requirements continue to be adequately met at Great North Road, Milford Haven. In doing so, shoppers will be disinclined from generating unsustainable travel patterns by shopping further afield.
- 5.3.10 A proportion of 'leakage' is generally to be expected to higher order centres in the region; however, by enhancing existing provision in the PCA, Milford Haven, will be better equipped to cater for local needs locally and, in turn, counteract any propensity for shoppers to shop further afield. In this manner the proposal will help to address unnecessary car journeys. It is thus logical and eminently sensible in planning terms to enhance the Milford Haven retail environment at established operators/locations. The application site is an established retail site and is accessible by walking, cycling and public transport. Accordingly, it is considered an appropriate location for additional retail investment, subject to satisfying the sequential and impact tests.

5.4 Summary

- 5.4.1 Quantitative and qualitative need for the proposed development has been demonstrated. The application site is an established retail site proposed to be enhanced to better cater for its well established customer base and meet the identified need for improved local facilities. It has been demonstrated improved retail provision will counteract an outflow of expenditure and help ensure retail need is met locally.
- 5.4.2 Accordingly, in respect of PPW guidance, need for the proposed development is considered to have been demonstrated.

6. The Sequential Approach to Site Selection

6.1 Introduction

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

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

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

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

6.2 Status of the application site

6.2.1 The application site falls within the defined settlement boundary for Pembrokeshire. It is not designated for any specific use (i.e. it is "white land"). It is located in an out-of-centre location in retail policy terms.

6.3 Application of the Sequential Approach

6.3.1 From the outset it is important to consider the application of the sequential approach. In doing so, Tetra Tech Planning has had regard to the Supreme Court decision in *Tesco Stores Ltd v. Dundee City Council* [2012] UKSC13, which forms a material consideration in the application of the sequential approach. The case considers the meaning of 'suitable' whereby the judgement held that 'suitable' relates directly to the development proposed by the applicant, subject to a reasonable level of flexibility and realism being shown by the developers. LPAs should not require development to be altered or reduced so that it can be made to fit an alternative site, as to do so may be to make an inappropriate business decision on behalf of the developer.

6.3.2 The Dundee judgment is important in that it considers the focus of the local planning guidance relevant to that proposed development. It notes the focus "...is upon the availability of sites which

might accommodate the proposed development and the requirements of the developer, rather than upon addressing an identified deficiency in shopping provision” (paragraph 27).

- 6.3.3 The Dundee judgement explains further: “... it would be an over-simplification to say that the characteristics of the proposed development, such as its scale, are necessarily definitive for the purposes of the sequential test. That statement has to be qualified to the extent that the applicant is expected to have prepared his proposals in accordance with the recommended approach: he is, for example, expected to have had regard to the circumstances of the particular town centre, to have given consideration to the scope for accommodating the development in a different form, and to have thoroughly assessed sequentially preferable locations on that footing. Provided the applicant has done so, however, the question remains, as Lord Glennie observed in *Lidl UK GmbH v Scottish Ministers* [2006] CSOH 165, para 14, whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site.
- 6.3.4 In view of the above, any site being considered must therefore be suitable for the proposed development, albeit ensuring that flexibility is demonstrated (for example, number of parking spaces and servicing space, configuration of floorspace etc).
- 6.3.5 Another English appeal decision is relevant - that of a mixed-use scheme informally referred to as *Rushden Lakes*¹, which was an appeal recovered and allowed by the Secretary of State. As well as declaring the Dundee judgement of “seminal importance” (paragraph 8.44) it also noted that English policy and guidance called for flexibility to be demonstrated and for ‘available’ sites to be considered but provides no guidance on the degree of flexibility of the timescale within which a site may become available.
- 6.3.6 Similarly, neither PPW or TAN 4 asks whether such sites are likely to become available during the remainder of the plan period or over a period of years and no indication is given of the degree of flexibility required of applicants.
- 6.3.7 In the *Scotch Corner* appeal² 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.
- 6.3.8 Against this backdrop of case law and recovered appeal decisions, PPW was revised in November 2016 (in the form of Edition 9 at that time). Edition 8 had previously stated, at paragraph 10.3.5:
- 6.3.9 “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

¹ APP/G2815/V/12/2190175 - LXB RP (*Rushden*) Limited v East Northamptonshire Council, June 2014

² APP/V273/V/15/3132873 & APP/V2723/V/16/3143678 – Land at West of the A618 Barrack Bank, *Scotch Corner*, Dec 2016

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.” (Tt emphasis)

6.3.10 This wording, which required disaggregation of elements of the scheme onto multiple sites was removed from PPW. Policy in Wales, therefore, does not require demonstration of a disaggregated approach (consistent with England and recent case law). It is clear, therefore that disaggregation is not a policy requirement. In any event, given that the underlying premise of this application is to provide a larger, existing store to improve its operation and customer experience, breaking the proposal up into smaller elements would clearly fail to meet fundamental requirements of the development.

6.4 Sequential Site Search

6.4.1 The approach adopted in this sequential site assessment is consistent with the recommendations and guidance set out in PPW and TAN 4 with regard to the sequential approach to site selection.

6.4.2 Tetra Tech Planning has therefore conducted a sequential site search of in order to ascertain whether there are any suitable, available and viable sites which could accommodate the proposed development. Bearing in mind the need for flexibility, the physical requirement to meet the needs of the proposed development have been taken to be:

- A site that can accommodate a store in excess of c.2,100 sqm gross to allow for provision of enhanced customer choice based on a full product range offer. The need to redevelop a larger store will address the deficiencies of the existing store, so it stands to reason that a smaller store would not address the need. There is no prospect for disaggregation in this instance;
- 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.

6.4.3 The approach that has been adopted in this sequential site analysis includes two elements; to firstly examine whether any sites or units are allocated in the adopted LDP, and secondly to undertake a detailed review of relevant nearby defined retail centres. A review of the

Pembrokeshire LDP proposals map has revealed there are no retail allocations within or in close proximity to the defined Milford Haven Centre. As such, the sequential site search has focussed upon the results of a centre survey undertaken by Tetra Tech Planning. A list of vacant units is outlined in the below table.

Table 3: Vacant Sequentially Assessed Sites, Milford Haven

Unit Location	Description
15 Charles Street	Vacant retail unit
16a Charles Street	Vacant retail unit
34 Charles Street	Vacant other building
38 Charles Street	Vacant retail unit
41a Charles Street	Vacant retail unit
44 Charles Street	Vacant retail unit
45 Charles Street	Vacant bank
63a Charles Street	Vacant retail unit
71 Charles Street	Vacant retail unit
81 Charles Street	Vacant restaurant
82-84 Charles Street	Vacant retail unit
86 Charles Street	Vacant retail unit
87 Charles Street	Vacant retail unit
89b Charles Street	Vacant retail unit
Unit at Robert Street	Vacant site
Unit at Robert Street	Vacant site
43 Mansfield Street	Vacant leisure unit
10 Hamilton Terrace	Vacant restaurant
12 Hamilton Terrace	Vacant bank
13 Hamilton Terrace	Vacant retail unit
16 Hamilton Terrace	Vacant bank
25 Hamilton Terrace	Vacant retail unit

26 Hamilton Terrace	Vacant restaurant
26a Hamilton Terrace	Vacant retail unit
30 Hamilton Terrace	Vacant retail unit
5 Priory Street	Vacant restaurant

6.4.4 Whilst a number of the vacant units outlined above were observed to be available during the centre survey, the sequential site search of vacant units within Milford Haven Centre highlights the constrained, relatively small size of units within the centre. All of the vacant units listed above are physically too small to accommodate the required floorspace of the proposed development which aims to provide an enlarged retail foodstore. On this basis, the vacant units identified above are considered unsuitable. Furthermore, the identified units are primarily located on the traditional high street frontage within the Centre. As such, they do not benefit from directly adjacent, dedicated customer parking facilities, nor dedicated servicing facilities for HGV access. On this basis the vacant units are considered commercially unviable. In summary, the units identified as part of the sequential search are deemed both unsuitable and unviable. The units are therefore discounted from the sequential site search.

6.5 Conclusion

6.5.1 Whilst both national and local planning policy require that a sequential test be applied, this must be done in a way which is compliant with recent judicial authority and policy. It is clear that the suitability of a site depends upon it being suitable to accommodate the development proposed by the applicant. The aforementioned decisions and policy context clarify that applicants do not need to disaggregate their proposals and that while flexibility must be applied, it is not for LPAs to require applicants to radically alter their proposals. Decisions on the sequential test must be applied in a 'real-world' context.

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

7. Assessment of Impact

7.1 Introduction

- 7.1.1 This section of the report considers the potential trading impact of the proposals in respect of the anticipated diversion of retail trade to the proposed (enlarged) foodstore, with particular regard to Milford Haven centre.
- 7.1.2 PPW paragraph 4.3.26 advises that for development of 2,500sqm gross or more an impact assessment should accompany planning applications for main town centre uses that are not in a centre. It is important to note from the outset of this chapter that the proposed development for the most part effectively constitutes the re-provision of existing floorspace, albeit incorporating additional floorspace as part of delivering an enhanced store experience. In this respect the majority of the floorspace proposed is not “new” floorspace. Accordingly, this chapter focuses on the additional floorspace uplift proposed i.e. 483sqm net. The proposed additional floorspace is well below the PPW/TAN4 floorspace threshold whereby impact assessments are typically sought. Notwithstanding this, in the interests of robustness, this section provides a proportionate assessment of impact for the proposed floorspace uplift. A trade diversion assessment has been carried out; based on the Council’s own retail evidence base provided in the South West Wales Regional Retail Study (SWWRRS (2017)).

7.2 Methodology and evidence base

- 7.2.1 The approach adopted in this impact assessment reflects national guidance and follows a widely adopted methodological approach to quantitative assessment in terms of assessing future capacity for retail development and quantifying impact. In practise the approach comprises five elements, as summarised below:

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

- 7.2.2 The catchment area is Zone 4 Milford Haven of the SWWRRS; this is the area in which the proposed development will draw the majority of its trade. Impact is assessed up to five years from the time of the application being made (base year). The design year of 2026 has been adopted for testing impact.

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

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

Step 3 - Assess turnover and trade draw.

- 7.2.4 The use of available household telephone survey information to identify existing shopping patterns and catchment area derived turnover levels of existing facilities is a widely adopted and

industry accepted approach to understanding the turnover of existing facilities. In addition, the use of published evidence of sales densities derived from company accounts also provides an industry accepted approach upon which to gauge the turnover of a proposed development.

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

Step 4 - Assess impact on existing centres.

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

Step 5 – Consider consequences of impact.

- 7.2.8 Any conclusions should be proportionate. It is important that the impacts are considered on the vitality and viability of the whole of a centre, not simply on individual facilities which may be similar to the proposed development.
- 7.2.9 The assessment utilises population and expenditure projections derived from the Council's SWWRRS 2017 which utilises a 2014 price base throughout.
- 7.2.10 The level of trade diversion is based on the generally acknowledged principles that:
- the trading effect on existing floorspace would generally be proportionate to their distance from the proposed new store. Numerous surveys of shopping patterns throughout the UK suggests that customers generally go to the store that is nearest to their place of residence which can provide for their particular shopping needs; and
 - stores tend to compete on a 'like with like' basis, such that foodstore proposals which have dedicated surface level car parking and provide a similar range of in-store customer facilities, would tend to compete directly for trade.
- 7.2.11 Accordingly, this assessment is fully in accordance with prevailing recommendations and guidance in quantifying retail impact, and comprises an orthodox and industry accepted approach to assessing impact. The statistical tables referred to in this section are provided at Appendix 2.

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

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

are established).

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

7.3.2 We are not aware of any known notable existing, committed or planned in-centre retail investment proposals in the catchment area upon which the proposed development may give rise to unacceptable impact.

7.4 Impact on allocated sites outside centres

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

7.5 Cumulative effects of the development

7.5.1 A mixed-use development including a foodstore at Milford Haven Marina was granted permission under application 14/0158/PA in November 2019. The development proposed 3,530 sqm gross with 2,741 sqm net sales area. This includes 2,471 sqm gross (1,730 sqm net sales) of convenience floor space and 1,059 sqm gross (741 sqm net sales) of comparison floorspace. Our assessment takes account of known commitments in the PCA and is considered in the capacity for additional convenience floorspace to 2026.

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

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

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

7.6.3 The following paragraphs assess the potential impact of the proposal on in-centre turnover, before conclusions are drawn on the impact on in-centre turnover and trade.

7.6.4 In considering impact on in-centre trade this section draws on the assessed retail turnover of the proposal and also considers the growth in population and available expenditure within the

catchment area. A detailed trading assessment of the potential impact that the proposal is likely to have on the patterns of retail expenditure in the surrounding area is then provided.

Turnover

7.6.5 Turnover is set out in detail in at Appendix 2. The annual turnover of the proposed additional floorspace is assessed to be £4.8m in 2026. It is assessed that 90% of the proposed development's turnover would be drawn from the catchment which, given the nature of the foodstore, is considered to be robust. The catchment turnover of the proposed development in 2026 is therefore assessed to be £4.3m.

Expenditure Growth

7.6.6 As outlined in the Council's evidence base provided in the SWWRRS 2017 the tables provided apply the estimates of expenditure per person to the resident population within the catchment area in order to outline the available retail expenditure generated over the period to 2026.

Table 4 Expenditure growth within PCA, 2021-26

Year	Population	Total Convenience Expenditure	Total Comparison Expenditure
2021	20,668	£38.8m	£49.4m
2026	20,707	£38.9m	£57.2m
Expenditure	£m	£0.1m	£7.8m
Growth 2021-2026	%	0.26	15.79

7.6.7 Analysis of expenditure growth can help provide an indication of the potential impact of a proposal. The above table demonstrates the underlying position within the PCA is one in which available convenience and comparison expenditure is expected to grow to 2026.

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

upon any specific retailer/ centre as there is no consistency in the range of comparison retail goods that Lidl sells.

7.6.9 The forecast Lidl store turnover uplift (c.£4.8m) is anticipated to be derived from additional convenience sales. As such, the remainder of this section focuses on the quantitative effect of the proposed additional convenience floorspace.

Trading Assessment

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

7.6.11 Set out at Table 9a of Appendix 2 is an assessment of how the introduction of the proposal will affect the projected retail turnovers of facilities within the surrounding area.

7.6.12 As noted earlier in this section the methodological approach employed is widely adopted and accords with guidance set out in TAN4. It involves the following steps:

- i. Establishing the existing (2021 (the base year)) expenditure pattern within the catchment/survey area, based on an identification of turnover levels of existing stores or centre derives from monies spent by households in the catchment/survey area.
- ii. Projecting the pattern of expenditure forward to 2026 (the design year) for testing impact assuming that each location maintains its current market share of expenditure.
- iii. Taking into account any changes in shopping patterns resulting from relevant retail commitments if applicable.
- iv. Assessing the pattern of trade draw to the proposal on the basis that foodstores will compete predominantly like for like with other foodstores.
- v. Calculating the quantitative impact of the proposal, in terms of:
 - The percentage reduction in trade at each store/centre at 2026; and
 - The percentage change in retail turnover in each store/centre between 2021 to 2026.

7.6.13 The analysis is based on an assessment of existing stores/centre turnovers derived from the Council's evidence base provided in the SWWRRS 2017.

7.6.14 The trading assessment provided predominantly considers the convenience turnover of the stores/centre. However, it is important to recall that the total retail turnover of a centre/destination consists of a combination of both convenience (food) and comparison (non-food) turnover. Impact must be weighed in the context of the whole of the centre. Accordingly, Table 9b considers the overall impact of selected Pembrokeshire-based stores having regard to available comparison

turnover information. Thus, the impact levels shown are typically considered to be a 'worse-case scenario' and in this case are considered highly robust.

- 7.6.15 Assessed levels of trade diversion to the new development is based on careful scrutiny of: the function and retail offer of various stores; the relative accessibility of the various facilities by car and public transport; and the known characteristics of existing stores elsewhere.
- 7.6.16 Existing trading patterns need to be taken into account, but as outlined a guiding principle impact is assessed on a 'like for like' basis in respect of the convenience sector. It is widely accepted that retail uses tend to compete with their most comparable competitive facilities. For example, in an area already served by modern convenience stores, the effects of new bespoke stores are likely to fall disproportionately on the existing competing modern stores. Their proportionate impact on smaller and local independent retailers, for example, may be less. Likewise, a proposal for a 'main food shop' supermarket is also less likely to compete with smaller 'top-up' convenience stores and corner shops.
- 7.6.17 These accepted patterns suggest that the proposed development will compete predominantly on a 'like for like basis' with large/medium sized foodstores; by their nature these are more commonly accommodated in out of centre locations.

Trading Effects

- 7.6.18 Two measures of retail impact are set out in Appendix 2:
- The change in turnover of centres in the period 2021-2026 following the development of the proposal; and
 - The impact of the proposal on the calculated 2026 turnover of centres/stores.
- 7.6.19 The key changes following the development of the proposal between 2020-26 is that there will be a diversion of trade and consequential decreases in turnover achieved at surrounding, competing centres/stores within the period to 2026. However, Table 9a/b highlights that the surrounding area is predominantly served by large out of centre foodstores which, broadly speaking, are trading strongly. The main offer in Milford Haven is at Tesco, Havens Head Park. In Pembroke Dock it is the Tesco at London Road, and at Haverfordwest Aldi at Salutation Square. The SWWRRS 2017 highlights, notwithstanding Lidl's existing store at Great North Road, these are the most popular destinations for PCA based residents. The proposed development will draw the majority of trade from these stores. Notwithstanding this, they will continue to trade strongly.
- 7.6.20 Table 9a at Appendix 2 demonstrate the effects of the proposed foodstore is anticipated to be predominantly felt by these large and/or comparably scaled foodstores, many of which typically lie out of centre and are a) not protected in retail terms and b) well equipped to absorb the trading effect.

7.6.21 It should also be recalled that PCA population and comparison expenditure will grow in the period 2021 to 2026 which, combined, will help offset or mitigate the impact arising from trade diversion to the proposed foodstore over the same period.

7.6.22 Having regard to the role, function, and vitality and viability of existing centres, the assessed levels of impact are not considered to be significantly adverse. In respect of impact on out of centre facilities, as outlined, these derive no protection from the planning system and need not be considered in further detail. Irrespective, they are well equipped to absorb the assessed trade diversion.

Summary

7.6.23 In summary, the proposed development constitutes the redevelopment of an existing, long standing and well-established local retail store, to deliver an enhanced facility for local shoppers. The enhanced store proposes an additional c.480sqm net floorspace, well below the PPW floorspace threshold, but which provides the focus of a proportionate impact assessment.

7.6.24 The assessed impacts of the proposed development are within acceptable levels, many of which fall on out of centre, unprotected destinations/facilities. These stores are equipped to absorb the relatively modest anticipated trading impact, which will be offset by a growth in population and retail expenditure in 2026. It has been demonstrated the proposed development does not result in any significant adverse impact on in-centre turnover and trade; in particular there is no evidence to suggest it will unacceptably affect the vitality and viability at Milford Haven centre.

8. Non-retail Material Considerations

8.1 Introduction

8.1.1 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

8.2 Principle of Development

8.2.1 The adopted Pembrokeshire LDP indicates the application site occupies a position inside the defined settlement boundary. The application site is not allocated for a specific use within the LDP and constitutes 'white land' as per the Proposals Map. As such, Policy SP13 confirms areas within the settlement boundary may be appropriate for development opportunities. As highlighted above, the application site is situated in Milford Haven, which the LDP defines as a 'Hub Town'. Policy SP13 indicates within Hub Towns, the settlement boundary defines the physical extent of the settlement, ensuring that development takes place in sustainable location. On this basis, the application site occupies a sustainable position within the settlement boundary, adhering to Policy SP13; establishing a basic principle of development.

8.2.2 Furthermore, Policy SP14 indicates development should seek to support and reinforce the role of Hub Towns, provide opportunities for new retail proposals and be accessible via a range of sustainable modes of transport. The proposed retail use within the settlement boundary of a Hub Town therefore adheres to Policy SP14, solidifying the role of Milford Haven. Additionally, the site's location within an established settlement pattern allows for high levels of accessibility via active travel and sustainable public transport. In summary, a robust principle of development has been established at the application site.

8.3 Sustainability

- 8.3.1 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 0.5 km north-east of Milford Haven town centre which offers a wide range of services and facilities. Therefore, the development occupies a wholly sustainable location and complies with the principles of sustainable settlement patterns. In terms of access to sustainable forms of public transport, the nearest bus stop adjoins the site to east on Great North Road, providing frequent access to the 300, 302, 315 & 356 bus service. In terms of active travel, the site benefits from good pedestrian linkages, with pedestrian footpaths lining Great North Road. This enables comfortable and safe pedestrian access to the surrounding area. Although the surrounding footpaths do not include dedicated cycle routes, Great North Road is entirely capable of safely accommodating cyclists.
- 8.3.2 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 sustainable transport links, including public transport routes and active travel opportunities.

8.4 Highways & Access

- 8.4.1 A Transport Assessment has been prepared by Corun Associates in support of the application and examines the highway and transportation issues associated with the proposed development.
- 8.4.2 Vehicular access will be provided via a new access point along the A4076 Great North Road. This access point will be designed to conform to DMRB design standards. Swept path analysis for a max legal 16.5m articulated vehicle accessing the proposed site shows that there is sufficient room for a vehicle of this size to manoeuvre within the site, and safely enter and exit this junction in a forward gear.
- 8.4.3 Pedestrian access to the proposed development will also be provided at the new access. The proposals include improvements to the existing layout, with inclusion of tactile paving and a dropped kerb crossing, and provision of direct access into the existing footway network along the A4076 Great North Road.
- 8.4.4 It has also been agreed that the applicant will undertake improvements to existing the Great North Road bus stop located directly outside the existing Enterprise car rental development. These improvements will be designed and agreed with Welsh Government and Pembrokeshire Highway Authority as part of the S278 Agreement, and will help to further promote bus travel to and from the site.
- 8.4.5 A robust highway impact assessment has been undertaken identifying that over the 12-hour weekday period between 07:00 to 19:00, the proposed re-development would lead to an increase in traffic of just 5.4% along the A4076 (in the vicinity of the site). During the weekday AM and PM highway peak hours, this increase in traffic is predicted to be just 4.7% and 5.4% respectively. These values represent a very 'worst case' scenario, and do not include any reductions expected

as a result of linked or pass-by trip considerations. It is therefore concluded that the re-development of the site will have a minor impact on weekday traffic flows on the local highway network and raises no major congestion concerns.

- 8.4.6 A review of the accident record along the A4076 Great Road in the vicinity of the site does not appear to identify an accident rate greater than what would be expected for a major road carrying this volume of traffic. With the minor impact on traffic levels predicted from the proposed development, and it is not expected to have an adverse impact on this existing highway safety record. The removal of the three existing vehicular access points for the Enterprise car rental site and the existing dwellings on the site will in turn bring with it potential highway safety improvements along this section of the road.
- 8.4.7 In summary, the Transport Statement demonstrates that the development should be considered acceptable in terms of highways and transportation. There are no reasons in highway and transportation terms why the proposed development should not be granted consent.

8.5 Parking Provision

- 8.5.1 A total of 102 car parking spaces are proposed at the new Lidl foodstore unit. These are within the maximum guidelines identified by local guidelines set out by Pembrokeshire County Council and based on the operator's extensive experience of demand at stores throughout the UK, is considered to be appropriate for the intended food store use.
- 8.5.2 A total of 15 enhanced parking bays (6 disabled and 9 parent and child) are proposed out of the 102 bays. This represents 15% of the total provision.
- 8.5.3 A total of 6 Sheffield cycle stands (allowing parking for up to 12 bicycles), and 2 electric vehicle charging spaces are also included within the proposals. These will help encourage these more sustainable modes of travel to the site.

8.6 Design & Landscaping

- 8.6.1 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 north elevation facing Great North 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.

- 8.6.2 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 the Landscape Strategy drawing.
- 8.6.3 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 GN.2 Sustainable Design of the LDP.

8.7 Drainage

- 8.7.1 A Drainage Strategy has been prepared by Hydrock in support of the planning application, in accordance with statutory standards for SuDS. The proposed development will utilise rain gardens to be linked to permeable paving sub-base with dropped kerbs or open jointed kerbs to be used to allow runoff from adjacent circulation areas to discharge directly into rain gardens.
- 8.7.2 Existing foul flows in the south of the site are to be diverted around rear of the proposed foodstore, with all works to divert the sewer subject to a Section 185 agreement with Dwr Cymru Welsh Water. A large rain garden is utilised in the south east of the site with 600mm depression to provide storage, connection to storage tank below via clean stone trench. The outfall from the permeable paving system sub-base will discharge above ground into the large rain garden. The existing pipework from the site to the public sewer is to be maintained with existing manhole to be rebuilt and replaced with flow control chamber. The preliminary design for the northern catchment area is based on a contributing area of 2759 sqm and a proposed paving area of 1128 sqm. Based on these areas the indicative depth of sub-base require for storage is 470mm, providing a minimum of 89cu of storage. The car parking circulation areas are designed to drain into adjacent parking areas.
- 8.7.3 Permeable paving is utilised in the car parking area, with bays to be connected via pipework. The northern area build up is based on 80mm blocks, 50mm bedding and 470mm sub-base. Proposed flows from the site are to be limited to 6.6 l/s for all storm events up to and including a 1 in 100 YRP event with 40% allowance for climate change. The northern catchment runoff betterment, post development is calculated at 1 YRP – 2.8 l/s (30%), 30 YRP – 16.5 l/s (71%) & 100 YRP + 30% climate change – 23.4 l/s (78%). The southern catchment runoff betterment, post development is calculated at 1 YRP – 5.4 l/s (30%), 30 YRP – 31.2 l/s (71%) & 100 YRP + 30% climate change – 43.2 l/s (78%). A total of 110cu storage for the southern catchment is to be provided in the form of permeable paving, cellular storage tanks and rain garden.
- 8.7.4 Further details of the Drainage Strategy can be viewed on drawing 7844 304 Rev A – Proposed Drainage Layout.

8.8 Ecology

- 8.8.1 A Preliminary Ecological Appraisal was prepared by Wildwood Ecology in support of the application, comprising a desk study and field survey. The appraisal indicates the development may result in impacts on wildlife and habitats affecting bats, nesting birds and hedgehogs. As a precaution, mitigation will also be required for common amphibians and reptiles. The appraisal recommends precautionary working measures should be deployed, with works supervised by a suitably qualified ecologist as appropriate. Preventative measures should be in place during construction phases including the placement of escape ramps in trenches to prevent entrapment of hedgehogs and herpetofauna (or amphibians/reptiles) if present. Chemicals/fuel should be stored in places where they cannot be accessed by wildlife.
- 8.8.2 Two bat boxes and five bird boxes are to be installed on new buildings/trees. Additionally, the scheme will incorporate a sensitive lighting scheme to ensure nocturnal wildlife is not impacted by an increase in anticritical light. Precautionary working measures will be used during vegetation clearance and construction phases to prevent the killing/injury to wildlife. One habitat pile should be created at the site as an enhancement for a number of species using wood/brush from vegetation clearance of buildings B & C. Specialist eradication measures are required for onsite Japanese knotweed. In respect of bats, a single bat activity survey is required on buildings A,B & D. Two bat activity surveys are required on building C.
- 8.8.3 To conclude, the full ecological impacts of the proposed development cannot be fully assessed following the PEA/PRA survey along and further survey work is required.

8.9 Noise

- 8.9.1 A Noise Impact Assessment was prepared by Hydrock in support of the application. The Assessment finds Operational noise from the delivery bay is predicted to exceed existing background noise levels and BS8233:2014 internal noise criteria at the closest existing dwellings.
- 8.9.2 It is therefore recommended that mitigation is incorporated to reduce noise from the delivery bay to a low impact in accordance with BS4142:2014. There will be a small increase on traffic flows on local roads and in the car park as a result of the development. However, the noise impact of this is expected to be negligible or minor. Limits have been proposed for the control of noise from fixed plant and services associated with the development. Installers will be contractually obliged to achieve these limits.

8.10 Geo-Environmental

- 8.10.1 A Phase 2 Site Investigation report has been prepared by Remada in support of the application. The ground conditions encountered within Remada's investigation supported those encountered during the previous investigation on-site. A thin veneer of made ground (<1m thick) was encountered underlain by firm, variably sandy and gravelly clay, generally becoming stiffer and more gravelly with depth. Localised bands of clayey gravelly sand and clayey gravels were encountered in addition to borderline cohesive and granular soils. The natural deposits on-site

are considered representative of weathered Milford Haven Group bedrock, classified as a Secondary (A) Aquifer.

- 8.10.2 In respect of human health risk, the results of soil chemical analysis were compared to Human Health Generic Assessment Criteria for commercial land use. None of the analytes tested were detected at concentrations that exceeded the human health GAC protective of on-site workers.
- 8.10.3 In respect of water resource risk, the site is directly underlain by cohesive and granular deposits associated with weathered Milford Haven Group bedrock, a Secondary A Aquifer. At the existing store and residential areas The results of the soil chemical analysis undertaken has identified that concentrations of metals and inorganic contaminants are within the range of typical made ground. Detectable concentrations of TPH and PAHs were encountered in some samples. However, the contaminants identified are of low solubility and mobility and as such are unlikely to present a risk to groundwater beneath the site. In addition, it should be noted that the site will be predominantly covered with the building and areas of hardstanding. Therefore, the risk of leaching of contaminants as a result of infiltration of groundwater is likely to be limited.
- 8.10.4 At the Enterprise Rental Car site, there are six (6 No) decommissioned USTs within the former petrol filling station zone of the site. As the proposed use of this zone of the overall site is for continued car parking no further action is considered necessary, however redevelopment of the site does provide an opportunity to remove the USTs and ensure that neither the surrounding or underlying soils have been impacted with hydrocarbons. Detectable concentrations of hydrocarbons were noted in the sub-base material (total TPH in the sample from WS10 at 0.15 – 0.4m bgl being 4100mg/kg). This exploratory hole was located adjacent to the former fuel dispensing island on the garage site, so is likely to represent low-level prolonged spillages during dispensing.
- 8.10.5 In respect of waste classification, in general the results of the chemical analysis indicate that the material would be classified as non-hazardous waste. While Waste Acceptance Criteria (WAC) analysis has not been undertaken, the assessment has included determination of the fraction of organic carbon (foc) which can be converted to TOC by multiplying the result by 100. A TOC limit of 3% is placed on waste destined for disposal in an inert landfill. Six of the eight soil samples selected for analysis were below this limit and would be considered potentially suitable for disposal in an inert landfill. The two soil samples that were in exceedance (from WS7 and WS8) were of topsoil from the garden areas, which would need to be stripped and stockpiled separately during the proposed redevelopment of the site.
- 8.10.6 One sample of bituminous surfacing was analysed for concentrations of PAH compounds. The results indicated that the concentrations of PAHs were generally low (total PAH-17 concentration of 2.8mg/kg) and that the concentration of benzo(a)pyrene of <0.1 mg/kg was below the 50mg/kg limit defined in WM3. Therefore, the bituminous surfacing represented by this sample would be classified as non-hazardous waste and assigned the List of Wastes code 17 03 02 for bituminous mixtures other than those mentioned in 17 03 01.

- 8.10.7 In terms of recommendations, preliminary calculations indicate that for a traditional pad foundation (1.5m wide) at a minimum of 1.5m depth, bearing within the firm cohesive materials (with a minimum undrained shear strength of 60kN/m²) or medium dense granular materials, a design bearing resistance of 130kN/m² will be appropriate in order to satisfy the ultimate and serviceable limit states in accordance with Eurocode 7 - Geotechnical Design. This is only applicable for foundations with loads that are applied vertically and centrally. To satisfy the serviceable limit state settlement has been limited to 25mm. applied vertically and centrally. To satisfy the serviceable limit state settlement has been limited to 25mm. Foundations will need to fully penetrate any made ground including fill material used to raise site levels and extend a minimum of 150mm into the bearing stratum.
- 8.10.8 A Design Sulphate Class DS-1 is considered appropriate for buried concrete and an ACEC Class of AC-1 is considered appropriate for the location. It is recommended that further intrusive investigation is undertaken within the footprint of the former garage area, in order to ascertain the composition and depth of potential made ground within this area.
- 8.10.9 In respect of ground gas, 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. However, the site is located within a Higher Probability Radon Area as between 10% and 30% of properties are indicated to be at or above the Action Level. Therefore, full radon protection measures are considered necessary in the proposed development.

8.11 Trees

- 8.11.1 A Pre-development Tree Survey & Assessment was prepared by TDA in support of the application. The survey identified 13 no. individual trees at the application site. Of the individual trees, 2 no. were assessed as Category B (moderate quality and value) and 11 were assessed as Category C (low quality and value). The survey concludes there are no trees of particular note on site.
- 8.11.2 A Tree Constraints Plan was prepared by TDA in support of the application. In order to identify the above and below ground constraints presented by existing retained trees at the Milford Haven site, the locations, numbers and assessed category of these trees, together with their crown spread, root protection areas (RPA) and shadow patterns, have been summarised and plotted on to the Tree Constraints Plan, drawing no: TDA.2590.02 at a scale of 1:200 @ A1. This drawing is included in Appendix 2 of the TCP. Where possible, development proposals for the site will need to accommodate both the above and below ground constraints illustrated by the Tree Constraints Plan to successfully retain existing trees.
- 8.11.3 Furthermore, development proposals should seek to include adequate space between existing trees and new structures to avoid any future management conflicts/issues. Where removal of

existing trees is unavoidable; their loss should be compensated by the planting of new native trees in-keeping with the arboricultural character of the area.

8.12 Economic Benefits

- 8.12.1 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).
- 8.12.2 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).
- 8.12.3 Existing jobs from the adjacent Lidl store will be transferred with the prospect of further job opportunities in the new larger store.

9. Conclusion

9.1.1 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 Pembrokeshire County Council for the demolition the existing Lidl foodstore and adjoining buildings, and the erection of a new Lidl foodstore, access, car parking, landscaping and all associated works at Lidl, Great North Road, Milford Haven.

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

- Quantitative and qualitative need for the proposed development has been demonstrated. The application site is an established retail site proposed to be enhanced to better cater for its well established customer base and meet the identified need for improved local facilities. It has been demonstrated improved retail provision will counteract an outflow of expenditure and help ensure retail need is met locally.
- The sequential test has identified that no sites can be considered available, suitable and viable sequentially preferable alternatives in respect of the proposals. The proposed development is considered, therefore, to fully accord with local and national policy and guidance as well judicial and appeal authority with respect to the sequential approach.
- The proposed development constitutes the redevelopment of an existing, long standing and well-established local retail store, to deliver an enhanced facility for local shoppers. The enhanced store proposes an additional c.480sqm net floorspace, well below the PPW floorspace threshold, but which provides the focus of a proportionate impact assessment.
- The assessed impacts of the proposed development are within acceptable levels, many of which fall on out of centre, unprotected destinations/facilities. These stores are equipped to absorb the relatively modest anticipated trading impact, which will be offset by a growth in population and retail expenditure in 2026. It has been demonstrated the proposed development does not result in any significant adverse impact on in-centre turnover and trade; in particular there is no evidence to suggest it will unacceptably affect the vitality and viability at Milford Haven centre

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

9.1.4 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.

Appendix 1 – Milford Haven GOAD Plan



50 metres

Experian Goad Plan Created: 05/08/2021
Created By: Experian Goad Sales

Appendix 2 – Retail Assessment Tables

Lidl Great Britain Ltd
Great North Road, Milford Haven
Statistical tables

Table 1: Population

Zone	2021	2022	2023	2024	2025	2026	2021-2026	
							No.	%
	[1]					[2]	[3]	[4]
Catchment Zone 4	20,668	20,676	20,684	20,691	20,699	20,707	39	0.2
Total	20,668					20,707	39	0.2

Notes:

[1] [2] 2021 to 2026 extrapolated from SWW Wales Regional RS 2017

[3] = [2] - [1]

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

Lidl Great Britain Ltd
Great North Road, Milford Haven

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

Zone	2021	2022	2023	2024	2025	2026
Zone 4 Milford Haven	£1,879	£1,879	£1,879	£1,880	£1,880	£1,880

Notes:

2021-2026 per capita figures extrapolated from Table 2 of SWW Regional RS 2017

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

Zone	2021	2022	2023	2024	2025	2026
Zone 4 Milford Haven	2,389	2,464	2,539	2,614	2,689	2,764
Total						

Notes:

2021-2026 per capita figures extrapolated from Table 2 of SWW Regional RS 2017

2014 prices

Lidl Great Britain Ltd
Great North Road, Milford Haven

Table 4: Total Convenience Goods Expenditure, PCA 2021-2026 (£m)

Zone	2021	2022	2023	2024	2025	2026	Change 2021-2026	
	£m						£m	%
	[1]					[2]	[3]	[4]
PCA Zone 4	38.80	38.82	38.84	38.86	38.88	38.90	0.10	0.26

Notes:

[1] & [2] Derived from Table 3 SWW Regional RS 2017

[3] = [2] - [1]

[4] = [3]%

Table 5: Total Comparison Goods Expenditure, PCA 2021-2026 (£m)

Zone	2021	2022	2023	2024	2025	2026	Change 2021-2026	
	£m					£m	£m	%
	[1]					[2]	[3]	[4]
PCA Zone 4	49.40	50.96	52.52	54.08	55.64	57.20	7.80	15.79

Notes:

[1] & [2] Derived from Table 3 SWW Regional RS 2017

[3] = [2] - [1]

[4] = [3]%

2014 prices

Lidl Great Britain Ltd
Great North Road, Milford Haven

Table 6a: Retail Turnover of Proposed Development

	Gross internal area (sqm)	Total Net Sales (sqm)	Net sales area (sqm)	Trading density (£/sqm)	Turnover 2021 (£m)	Turnover 2026 (£m)	PCA Turnover 2026 (£m)
	[1]	[2]	[3]	[4]	[5]	[6]	[8]
Lidl Foodstore convenience comparison	2,121	1,399	1,119	9,875	11.1	11.1	9.9
Floorspace Uplift (convenience)		483	280	6,487	1.8	2.1	1.9
			483	9,875	4.8	4.8	4.3
Total					12.9	13.2	11.8

Notes

[2] Net sales area taken from application drawings

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

[4] s/d taken from Global Data (index linked to 2014 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))

[7] = assumes 90% 2021 PCA Turnover

[8] = assumes 90% 2026 PCA Turnover

2014 prices

Lidl Great Britain Ltd
Great North Road, Milford Haven

Table 7: Existing Store Convenience Turnovers 2021, 2026

	Turnover 2021 Convenience (£m)	Turnover 2026 Convenience (£m)
	[1]	[2]
Milford Haven Town Centre		
Spar, Charles Street	0.30	0.30
All Stores	2.10	2.10
<i>Out of centre</i>		
Tesco, Havens Head Park	11.40	11.40
Pembroke Dock Town Centre		
Asda, Gordon Street	14.10	14.20
Other Stores	0.60	0.60
<i>Out of centre</i>		
Lidl Pier Road	15.80	15.80
Tesco, London Road	24.80	24.80
Haverfordwest Town Centre		
Iceland, Picton Place	3.00	3.00
Other Stores	3.30	3.30
<i>Out of centre</i>		
Aldi, Salutation Square	28.30	28.40
Lidl, Perrots Rd	9.80	9.90
Marks & Spencer, Withybush RP	1.90	1.90
Morrisons, Meadow View	28.90	29.00
Tesco Extra, Fenton Trading Estate	29.50	29.60

Notes

[1] taken from Appendix 5 Table 3 of the SWW Wales Regional RS 2017

[1] taken from Appendix 5 Table 4 of the SWW Wales Regional RS 2017

[4] [5] sales densities taken from Mintel RR18 at 2018 price base

[6] [2]x[4]/1,000,000

[7] [3]x[5]/1,000,000

[8] [6]+[7]

2016/3169/S73 | Variation of condition 1 of planning permission 2/2/79/0826/02 granted 11th March 1980 to broaden the range of goods to be sold

Table 8 Capacity for additional convenience floorspace to 2026

	2021	2026
[1] Available Convenience Expenditure in PCA (Zone 4 Milford Haven) (£m)	39.2	38.9
[2] PCA derived turnover of existing stores in PCA (Zone 4)(£m)	21.0	20.9
[3] PCA derived turnover of proposed development (£m)		4.3
[4] PCA derived turnover of Convenience Retail Commitments in PCA (£m)		12.0
[5] Total PCA turnover (£m)	21.0	37.1
[6a] PCA convenience expenditure capacity (£m)	18.2	1.8

Notes

[1] taken from table 2 & 4 of Appendix 5 of SWW Regional RS 2017

[2] derived from table 2 & 4 Appendix 5 of SWW Regional RS 2017. Total Milford Haven derived turnover

[3] taken from table 6 a

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

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

2014 prices

Table 9a: Convenience trading effects of the proposed development 2026

	Turnover		Trade Draw to Proposed Development		Residual Turnover 2026	Impact			
	2021	2026	%	£m	£m	Change 2021-26		2026 Impact	
	[1]	[2]	[3]	[4]	[5]	£m	%	£m	%
Milford Haven Town Centre									
Spar, Charles Street	0.30	0.30	0.5	0.02	0.28	-0.02	-7.95	-0.02	-7.95
All Stores	2.10	2.10	1	0.05	2.05	-0.05	-2.27	-0.05	-2.27
	2.40	2.40	1.5	0.07	2.33	-0.07	-2.98	-0.07	-2.98
<i>Out of centre</i>									
Tesco, Havens Head Park	11.40	11.40	26	1.24	10.16	-1.24	-10.88	-1.24	-10.88
Pembroke Dock Town Centre									
Asda, Gordon Street	14.10	14.20	3	0.14	14.06	-0.04	-0.31	-0.14	-1.01
Other Stores	0.60	0.60		0.00	0.60	0.00	0.00	0.00	0.00
	14.70	14.80	3	0.14	14.66	-0.04	-0.29	-0.14	-0.97
<i>Out of centre</i>									
Lidl Pier Road	15.80	15.80	5	0.24	15.56	-0.24	-1.51	-0.24	-1.51
Tesco, London Road	24.80	24.80	15	0.72	24.08	-0.72	-2.88	-0.72	-2.88
Haverfordwest Town Centre									
Iceland, Picton Place	3.00	3.00	1	0.05	2.95	-0.05	-1.59	-0.05	-1.59
Other Stores	3.30	3.30	1	0.05	3.25	-0.05	-1.45	-0.05	-1.45
	6.30	6.30	2	0.10	6.20	-0.10	-1.51	-0.10	-1.51
<i>Out of centre</i>									
Adi, Salutation Square	28.30	28.40	14	0.67	27.73	-0.57	-2.01	-0.67	-2.35
Lidl, Perrots Rd	9.80	9.90	5	0.24	9.66	-0.14	-1.41	-0.24	-2.41
Marks & Spencer, Withybush RP	1.90	1.90		0.00	1.90	0.00	0.00	0.00	0.00
Morrisons, Meadow View	28.90	29.00	9	0.43	28.57	-0.33	-1.14	-0.43	-1.48
Tesco Extra, Fenton Trading Estate	29.50	29.60	9	0.43	29.17	-0.33	-1.12	-0.43	-1.45
Inflow			10	0.48					
			100	4.8					

Notes

- [1] & [2] taken from table 7
- [3] & [4] T1 estimate - allowing for floorspace efficiency growth to 2026 (table 6a)
- [5] = [2] - [4]
- [6] = [5] - [1]
- [7] = [5]/[1]*100
- [8] = [5]/[2]
- [9] = [5]/[2]*100

Table 9b: Overall Impact

	Turnover 2021 (£m)			Turnover 2026 (£m)			Residual Turnover 2026 (£m)			Overall Impact	
	convenience	comparison	Total	convenience	comparison	Total	convenience	comparison	Total	(£m)	(%)
	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]
Milford Haven Town Centre	2.40	8.4	10.80	2.40	9.7	12.10	2.33	9.7	12.03	1.23	-0.59
Pembroke Dock Town Centre	14.70	24.3	39.00	14.80	28.1	42.90	14.66	28.1	42.76	3.76	-0.33
Haverfordwest Town Centre	6.30	110.5	116.80	6.30	128.1	134.40	6.20	128.1	134.30	17.50	-0.07

Notes

- [1] taken from table 9a
- [2] taken from Table 2 of Appendix 6 of SWW Regional RS 2017
- [3]=[1]+[2]
- [4] taken from table 9a
- [5] taken from Table 4 of Appendix 6 of SWW Regional RS 2017
- [6]=[4]+[5]
- [7] taken from table 9a
- [8] = [5]
- [9] = [7]+[8]
- [10] = [9]-[3]
- [11] = [9]/[6]*100