

Planning & Retail Statement

Former Halfway Garage, Blackpill, Swansea
Lidl Great Britain Ltd

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Prepared on Behalf of Tetra Tech Planning

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1. Introduction & Report Structure

1.1 Introduction

1.1.1 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 Swansea Council for the demolition of an adjacent residential dwelling and the erection of a supermarket, car parking, landscaping and all associated works at the former Halfway Garage, Blackpill, Swansea.

1.2 Report Structure

1.2.1 The report assesses the requirements of local and national retail planning policy relevant to this location 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 relating to retail need;
- Section 6: considers the application of the sequential approach and the search for a sequentially preferable site that has been undertaken;
- Section 7: addresses the retail impact of the proposed development; and
- Section 8: considers non-retail material considerations; and
- Section 9: provides conclusions

2. The Proposed Development

2.1 Site Description & Surroundings

- 2.1.1 The application site is located within the settlement of Blackpill, a suburban area of west Swansea, which sits beside Swansea Bay and is situated approximately 3.7km southwest of the city centre. The application site is a broadly square parcel of land which extends to approximately 0.4 Ha and occupies a prominent position, fronting Mumbles Road (A4067). The site currently comprises vacated, cleared land following the demolition of a Shell petrol filling station and associated buildings in 2017, which historically occupied the site. The site was remediated of its former use and now lies clear and unused. Vehicular access to the site is currently achieved via two points on the site's south eastern border, from Mumbles Road.
- 2.1.2 In respect of surroundings, Mumbles Road runs parallel to the sites south eastern border. A 'pitch & putt' golf course is found immediately beyond Mumbles Road to the east. Residential dwellings adjoin the site to the north east and west, whilst an area of greenspace adjoins the site to the north west. In terms of floodrisk the Development Advice Map indicates the site comprises areas of both Flood Zone A – Considered to be at little or no risk of fluvial or coastal/tidal flooding and Flood Zone C2 – Without significant flood defence infrastructure. In terms of heritage, the Cadw Designated Historic Assets map indicates there are no heritage assets, including listed buildings and scheduled ancient monuments within or in the immediate vicinity of the application site.

2.2 Planning History

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

Application Ref	Proposal	Decision
2017/0105/PND	Demolition and removal of all associated fuel infrastructure, including tanks and pipework (application for the Prior Notification of Proposed Demolition). Below Ground: Removal of all associated fuel infrastructure, including tanks and pipework.	Prior approval not required February 2017
2015/0712	Installation of replacement underground fuel tanks, fuel pipework, dispensers, above ground fills and vents and replacement petrol interceptor following removal of those existing, removal of carwash, additional parking spaces, new extension to single storey sales building and extended canopy link, external floodlighting and replacement external plant (condensers) and new bin store	Approved June 2015
2015/0300	Discharge of conditions 2 (construction pollution management plan), 3 (contamination) and 7 (surface water construction management plan) of planning permission 2014/0655 granted 27th June 2014	Approved April 2015
2014/0655	Variation of condition 6 of planning permission 2013/1406 dated 10th December 2013 to allow 3 months to submit reports	Approved June 2014
2014/0290	Discharge of conditions 3 and 4 of planning permission	Approved April

	2013/1406 granted 10th December, 2013 (details of lighting and statement for invasive plants)	2014
2013/1406	Installation of replacement underground fuel tanks, pipe-work, dispensers, above ground fills and vents and replacement petrol interceptors, additional parking spaces, new flood lighting and tanker stand	Approved December 2013
A00/1042	Provision of LPG vessel with 1.8m high compound fencing	Approved September 2000
99/0937	Single storey extension to sales building to house automatic teller machine	Approved October 1999

2.3 The Proposed Development

- 2.3.1 The proposed development comprises the erection of a foodstore extending to 2,194 sqm GEA, parking, access arrangements, soft landscaping and all associated works at the Former Halfway Garage, Mumbles Road, Swansea. It is proposed to develop a foodstore measuring c. 2,029 sqm GIA with a proposed net sales area of 1,102 sqm net. It is anticipated 80% of the net sales area will be laid out for food sales (c.881 sqm net), with the remainder for non-food sales (c.220 sqm net).
- 2.3.2 The proposed foodstore will be positioned to address Mumbles Road, with the store frontage set back from the road, in the western half of the site. The dedicated customer car park will immediately adjoin Mumbles Road with vehicular access from the site's south eastern boundary. The car park will provide 50 parking bays including: 37 standards spaces; 4 disabled spaces; 7 parent & child spaces; and 2 electric vehicle spaces. Soft landscaping will be utilised at the store's rear elevation and in areas adjoining the site's south eastern and southern boundary along Mumbles Road and Glyn Crescent.
- 2.3.3 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 38 (6) of the Planning and Compulsory Purchase Act 2004 states that: “If regard is to be had to the Development Plan for any purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the Plan unless material considerations indicate otherwise”.

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

3.1.3 “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”.

3.1.4 The development plan therefore comprises the Swansea Local Development Plan 2010 – 2025 (adopted on 28th February 2019), in addition to the National Development Framework for Wales (Future Wales: The National Plan 2040). Material considerations at a local level also include the relevant Supplementary Planning Guidance. Material considerations at a national level include Planning Policy Wales Edition 11 (February 2021) and the appropriate Technical Advice Notes (TANs). The policies of relevance to the proposed development at both a local and national level will now be discussed in detail below.

Swansea Local Development Plan 2010-2025

3.1.5 The Swansea Local Development Plan (LDP) 2010-2025 was adopted on 28th February 2019. The policies of relevance to the proposed development are now discussed in further detail below.

3.1.6 Policy PS 1: Sustainable Places indicates that in order to deliver sustainable places and strategically manage spatial growth, the delivery of new homes, jobs, infrastructure and community facilities must comply with the Plan’s sustainable settlement strategy which requires the following:

- i. Development to be directed to the most sustainable locations within settlement boundaries;
- ii. New homes and jobs to be delivered in a manner consistent with growth forecasts and the Plan’s sustainable House and Employment Strategies;
- iii. The safeguarding and protection of the character and openness of the Green Belt and Green Wedges; and
- iv. Inappropriate development in the countryside to be resisted.

- 3.1.7 Policy PS 2: Placemaking and Place Management states development should enhance the quality of places and spaces, and respond positively to aspects of local context and character that contribute towards a sense of place. Furthermore, the design, layout and orientation of proposed buildings, and the spaces between them, should provide for an attractive, legible, healthy, accessible and safe environment. Additionally, all proposals should ensure that no significant adverse impacts would be caused to people's amenity. Policy PS2 continues to highlight a number of advantageous design principles.
- 3.1.8 Policy PS 4: Sustainable Employment Strategy indicates opportunities for business growth and the potential for the creation of 13,600 additional jobs over the Plan period result in a requirement for 19 hectares of employment land. This will be provided for by means of a Sustainable Employment Strategy, based on the allocation of strategic sites, retaining active employment land that forms part of the land bank and rural employment sites.
- 3.1.9 Policy IO 1: Supporting Infrastructure and Planning Obligations indicates development must be supported by appropriate infrastructure, facilities and other requirements considered necessary as part of the proposal. Where necessary, planning obligations will be sought to ensure the effects of development are fully addressed to make the proposals acceptable.
- 3.1.10 Policy IO 2: Employment and Training Opportunities indicates developers are encouraged to work with the Council to maximise added benefits from the development in relation to the creation of training and job opportunities in line with the Council's Beyond Bricks and Mortar Policy.
- 3.1.11 Policy SI 8: Community Safety states development must be designed to promote safe and secure communities and minimise the opportunity for crime. This includes a number of design features, including: the use of natural surveillance, creating a sense of ownership by utilising clear boundaries, avoid the creation of gated communities and to provide well designed security features.
- 3.1.12 Policy RC 2: Retail and Leisure Development indicates retail and leisure proposals must in the first instance assess the suitability of sites and premises within the following Centres of the retail hierarchy, having regard to the nature, scale and location of the proposed development:
- 3.1.13 In accordance with National Planning Policy, where proposals demonstrate there are no suitable available sites or premises within the above Centres, then edge of centre sites can be considered in preference to out of centre locations. Appropriate assessments of need and retail impact must be submitted by the developer in support of proposals at edge of centre and out of centre sites. Where evidence clearly demonstrates that no sites within centres or at edge of centre locations can be made available for the proposed development, out of centre sites will be considered. In such circumstances, developers should consider available sites and premises within defined Retail Park boundaries, which are the preferred location for out of centre retail developments.
- i. Swansea Central Area Retail Centre

- ii. District Centres
- iii. Local Centres

3.1.14 Retail and leisure proposals will only be permitted at out of centre locations outside Retail Parks in exceptional circumstances, and where a specific need is identified, for:

- A. Small scale development intended only to serve an identified local need (in accordance with Policy RC 6 Local Centres);
- B. Development that is part of a planned new Centre or is a specific facility proposed to serve a substantial new residential neighbourhood within a Strategic Development Area (in accordance with Policy RC 8 Commercial Development Within Strategic Development Areas);
- C. Development that requires a particular type of unit, either with an extensive floor area and/or a bespoke designed premises, that is not normally available within Centres or Retail Parks, in order to accommodate the proposed range of goods to be sold.

3.1.15 Under Policy RC5 of the LDP District Centres are designated at Clydach, Gorseinon, Gowerton, Killay, Morriston, Mumbles, Pontarddulais, Sketty, Uplands. Under Policy RC6 Local centres are designated at, inter alia, Kittle (Pennard Road), Murton (Mansfield Road), Sketty (Sketty Park Drive), Tycoch (Tycoch Cross), West Cross (Alderwood Road), West Cross (West Cross Lane).

3.1.16 Policy ER1: Climate Change states to mitigate against the effects of climate change, adapt to its impacts and ensure resilience, development proposals should take into account (inter alia) reducing carbon emissions; protecting and increasing carbon sinks; adapting to the implications of climate change; promoting energy and resource efficiency and increasing the supply of renewable and low carbon energy; avoiding unnecessary flood risk; and maintaining ecological resilience.

3.1.17 Policy ER 8 Habitats and Species indicates development proposals that would have a significant adverse effect on the resilience of protected habitats and species will only be permitted where:

- I. The need for development outweighs the nature conservation importance of the site;
- II. The developer demonstrates that there is no satisfactory alternative location for the development which avoids nature conservation impacts; and
- III. Any unavoidable harm is minimised by effective mitigation to ensure that there is no reduction in the overall nature conservation value of the area. Where this is not feasible, compensation measures designed to conserve, enhance, manage and, where appropriate, restore natural habitats and species must be provided.

- 3.1.18 Policy ER 9 Ecological Networks and Features of Importance for Biodiversity indicates development proposals will be expected to maintain, protect and enhance ecological networks and features of importance for biodiversity. Particular importance will be given to maintaining and enhancing the connectivity of ecological networks which enable the dispersal and functioning of protected and priority species.
- 3.1.19 Development proposals that could result in an adverse effect on the connectivity of ecological networks and features of importance for biodiversity will only be permitted where:
- i. The need for the development outweighs the nature conservation value of the site;
 - ii. It can be demonstrated that there is no satisfactory alternative location for the development;
 - iii. A functional connected element of the natural resource is retained as part of the design of the development; and
 - iv. Compensatory provision will be made of comparable or greater ecological value to that lost as a result of the development.
- 3.1.20 Policy ER 11: Trees, Hedgerows and Development indicates development that would adversely affect trees, woodlands and hedgerows of public amenity or natural/cultural heritage value, or that provide important ecosystem services will not normally be permitted. The policy sets out a criterion for development that would normally not be permitted concerning ancient woodland, ancient woodland sites and ancient and veteran trees. Where necessary, planning applications for development proposals on sites containing or adjacent to trees will be required to provide a tree survey; arboricultural impact assessment; method statement and/or a tree protection plan. Where trees are to be replaced, a scheme for tree replacement must be agreed prior to the commencement of development, including details of planting and aftercare.
- 3.1.21 Policy T1: Transport Measures and Infrastructure indicates development must be supported by appropriate transport measure and infrastructure, and depending on the nature, scale and siting of the proposals, sets of a criterion for development. Development that would have an unacceptable impact on the safe and efficient operation of the transport network will not be permitted.
- 3.1.22 Policy T2: Active Travel indicates development must take opportunities to enhance walking and cycling access by incorporating within the site, and/or making financial contributions towards the delivery off-site of measures including;
- i. Permeable, legible, direct, convenient, attractive and safe walking and cycling routes that connect the proposed development to: surrounding settlements; public transport nodes; community facilities; commercial and employment areas; tourism facilities; and leisure opportunities;
 - ii. Improvements, connections, and/or extensions to: existing PROWs (particularly bridleways); the Wales Coastal Path; the Cycle Swansea Bay

routes; National Cycle Network Routes 4 and 43; Safe Routes to School; shared use paths; and routes forming part of the green infrastructure network;

- iii. The delivery of infrastructure designed in accordance with standards of good practice; and
- iv. Facilities that encourage the uptake of walking and cycling, including but not limited to: appropriate signage; secure and convenient cycle parking; and changing and shower Swansea Local Development Plan facilities.

3.1.23 Policy T5: Design Principles For Transport Measures and Infrastructure provides a comprehensive transport design criterion which indicates all proposals must ensure that the design of development, together with any supporting transport measures and infrastructure should (inter alia) maximise site accessibility via active travel and public transport; allow for safe and efficient movement; minimise vehicle speeds; provides suitable facilities and a safe environment for pedestrians and cyclists; and accords with standards of good practice.

3.1.24 Policy T6: Parking states proposals must be served by appropriate parking provision, in accordance with maximum parking standards, and consider the requirements for cycles, cars, motorcycles and service vehicles. Where sufficient parking cannot be provided on site, or is judged not to be appropriate, the developer will be required to provide a financial contribution towards alternative transport measures. Additionally, secure cycle parking facilities will be sought in all major development schemes.

3.1.25 Policy RP 1 Safeguarding Public Health and Natural Resources: indicates development will not be permitted that would result in significant risk to life; human health and well-being; property; controlled waters; or the natural and historic environment, particularly in respect of: air, noise & light pollution; flood risk; water resources; land contamination; land instability or subsidence; and sustainable waste management.

3.1.26 Policy RP 2 Noise Pollution: indicates where development could lead to exposure to a source of noise pollution it must be demonstrated that appropriate mitigation measures will be implemented, and incorporated into the design of development to minimise the effects on existing and future occupants. Noise sensitive developments will not be permitted unless effective and appropriate mitigation is carried out to prevent exposure to existing noise generating uses.

3.1.27 Policy RP 5 Avoidance of Flood Risk: indicates in order to avoid the risk of flooding, development will not be permitted:

- i. In areas at risk of fluvial, pluvial, coastal and reservoir flooding, unless it can be demonstrated that the development can be justified in-line with national guidance and is supported by a technical assessment that verifies that the new development is designed to alleviate the threat and consequences of flooding;

- ii. In areas at risk of flooding from local sources, unless the Council is satisfied with the proposed drainage strategy;
- iii. Where it would lead to an increase in the risk of flooding on the site or elsewhere from fluvial, pluvial, coastal or increased water run-off from the site;
- iv. Where it would have a detrimental effect on the integrity of existing fluvial, pluvial or coastal flood defences;
- v. Where it would impede access to existing and future tidal and fluvial defences for maintenance and emergency purposes; or
- vi. Where the proposal does not incorporate environmentally sympathetic flood risk mitigation measures, such as SuDS, unless it can be demonstrated that such measures are not feasible.

3.1.28 Policy RP 6 Land Contamination: indicates development proposals on land where there is a risk from actual or potential contamination or landfill gas will not be permitted unless it can be demonstrated that measures can be taken to satisfactorily overcome any significant risk to life, human health, property, controlled waters, or the natural and historic environment.

3.1.29 Policy RP 10 Sustainable Waste Management for New Development: indicates Development will be required to incorporate, as appropriate, adequate and effective provision for the storage, recycling and other sustainable management of waste, and allow for appropriate access arrangements for recycling and refuse collection vehicles and personnel.

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 socio-economic background and circumstances).
- A Wales of cohesive communities: Attractive, viable, safe and well-connected communities.
- A Wales of vibrant culture and thriving Welsh language: A society that promotes and protects culture, heritage and the Welsh language, and which encourages people to participate in the arts, and sports and recreation.
- A globally responsive Wales: A nation which, when doing anything to improve the economic, social, environmental and cultural well-being of Wales, takes account of whether doing such a thing may make a positive contribution to global well-being.

3.2.2 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.

Future Wales: The National Plan 2040 (February 2021)

3.2.4 Future Wales is the highest tier of development plan in Wales. It is focused on solutions to issues and challenges at a national scale. Its strategic nature means it does not allocate development to all parts of Wales, nor does it include policies on all land uses. Nevertheless, planning decisions at every level of the planning system in Wales must be taken in accordance with the development plan as a whole.

3.2.5 Under Policy 1 the Welsh Government supports sustainable growth in all parts of Wales. In three National Growth Areas there will be growth in employment and housing opportunities and investment in infrastructure. The National Growth Areas are: Cardiff, Newport and the Valleys; Swansea Bay and Llanelli; and Wrexham and Deeside.

3.2.6 The Welsh Government has adopted a ‘Town Centre First’ approach. Policy 6 of the NDF states significant new commercial, retail, education, health, leisure and public service facilities must be located within town and city centres. They should have good access by public transport to and from the whole town or city and, where appropriate, the wider region.

3.2.7 This policy applies to developments of a significant scale, which can broadly be defined as where the facility will serve a town, city or region-wide catchment. Planning authorities are encouraged to take a similar approach for smaller developments.

3.2.8 A sequential approach must be used to inform the identification of the best location for these developments and they should be identified in Strategic and Local Development Plans.

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

3.2.9 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”.

3.2.10 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”.

3.2.11 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”.

3.2.12 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

3.2.13 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”.

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

Retail Policy

3.2.15 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.

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

3.2.17 Paragraph 4.3.20 highlights that “Edge-of-centre or out-of-centre sites should be accessible by a choice of public and private modes of travel”.

3.2.18 It is also highlighted at Paragraph 4.3.20 that “New out-of-centre retail developments or extensions to existing out-of-centre developments should not be of a scale, type or location likely to undermine the vibrancy, attractiveness and viability of those retail and commercial centres that would otherwise serve the community, and should not be allowed if they would be likely to put development plan retail strategy at risk”.

3.2.19 In regards to the need to undertake a Retail Impact Assessment, it is confirmed at Paragraph 4.3.26 that “All retail planning applications or retail site allocations of 2,500 sq. metres or more gross floorspace that are proposed on the edge of or outside designated retail and commercial centres should, once a need has been established, be supported by a retail impact assessment”.

Economic Development Policy

3.2.20 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”.

3.2.21 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 Material Considerations

Technical Advice Note 4: Retail and Commercial Development 2016

3.3.1 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

- 3.3.2 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.
- 3.3.3 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”.
- 3.3.4 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

- 3.3.5 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.
- 3.3.6 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”.
- 3.3.7 Paragraph 1.2.5 states: “Local planning authorities should recognise market signals and have regard to the need to guide economic development to the most appropriate locations, rather than prevent or discourage such development.”

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

- 3.3.8 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”.
- 3.3.9 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.”
- 3.3.10 The Building Better Places guide develops on the recent letter issued to the Chief Planning Officers from Julie James, Minister for Housing and Local Government (7th July 2020) which sets out the anticipated economic consequences of the Covid-19 pandemic, including the impacts on construction and the built environment. The document emphasises the need to encourage ‘place-making’, as advocated by PPW 10, at the heart of the recovery process.

Swansea Retail & Leisure Study 2015

- 3.3.11 Undertaken by Bilfinger GVA, the Swansea Retail & Leisure Study 2015 assisted the Council in the production of the Swansea LDP. The study investigates the key issues relating to retail and leisure provision and town centre health within the Swansea area. A study of the retail health indicators of district centres found many of the centres have a much stronger focus on convenience goods shopping for both main and top-up food shopping, along with a strong service function. Local independent traders and convenience style retailers form an important part of the retail offer of district centres.
- 3.3.12 In terms of need the assessment concludes that there is not any quantitative need for additional convenience goods floorspace, which is primarily influenced by the scale of existing provision. The quality of provision for convenience goods floorspace is also good although the assessment identifies that substantial new areas of housing are likely to require accessible food shopping facilities.

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 Swansea Retail and Leisure Study 2015; and our own site visits/surveys (August 2021) and observations.

4.2 Mumbles District Centre

4.2.1 Mumbles is a settlement at the western edge of Swansea Bay on the southern coastline of Wales, situated approximately 6.3 km south west of Swansea City Centre. The Swansea Local Development Plan 2010-2025 (adopted 19th February 2019) identifies Mumbles as a district centre within the retail hierarchy. The centre extends along Newton Road and primarily along the western edge of Mumbles Road, however this extends to both sides of the road around the junction with Dunnes Lane and includes the Oyster Wharf development. The centre primarily comprises smaller, traditional high street units, with terraced properties lining much of Newton Road and Mumbles Road.

Retailer Representation

4.2.2 Mumbles district centre benefits from a comprehensive range of local independent retailers. The independent operators in the centre include; Home From Home Travel Agent, Roman's Bar, Ninety Three Pizza, Chai Deli, Roco Hair, Oyster Gallery, Closeout Surf Co., Pebble, No. 64 Salon, Cover to Cover Bookshop, Dewkes of Mumbles, Jones Bar & Kitchen, Mumbles Flooring, Café Valance, Pippins Tea & Coffee Merchant, Castleton Walk Market, Tuckers Butcher, Judith Roberts Optician, The Choice is Yours Grocers, The White Rose Public House, Elizabeth Antiques, Dark Horse Bar, Davies of Mumbles, Mumbles Fine Wine, Coakley's Fishmongers and Gower Gallery.

4.2.3 This comprehensive offering of independent operators is complemented by a collection of national multiples including; Prezzo, Co-op Food, Croeso Lounge, Bistrot Pierre, Peacocks, Boots, Joules, Seasalt, Greggs, Fat Face, White Stuff, Tesco Express, Marks & Spencer Food, Principality Building Society and Saltrock.

Diversity of Uses

4.2.4 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	August 2021		UK Average %
	No. Units	% Total	
Convenience	17	16	9%
Comparison	41	39	27%
Retail Services	14	14	15%
Leisure Services	17	16	24%
Financial & Business Services	8	7	9%
Vacant	6	5	14%
Total	103	100	100%

4.2.5 The convenience sector numbers 17 units, representing 16% of the centre. This level of provision is above the national average of 9%. Key operators within the convenience sector include Co-op Food, Tesco Express and Marks and Spencer Food.

4.2.6 The comparison sector accounts for 41 units. This level of provision accounts for 39% of the centre and operates 12% below the national average of 27%.

4.2.7 The retail service sector represents 14% of the centre, numbering 14 units in total. The sector operates 1% below the national average of 15%.

4.2.8 The leisure services sector represents 16% of the centre, accounting for 17 units. This level of provision is below the national average of 24%.

4.2.9 The financial and business services sector represents 7% of the centre, accounting for 8 units. This level of provision operates 2% below the national average of 9%.

Vacancies

4.2.10 Vacant units account for 5% of Mumbles district centre, equivalent to 6 units. The level of vacancies operates at a level 9% below the national average of 14%, with vacant units generally well dispersed in the centre. The low level of vacancies observed during the survey demonstrates the strength and vitality of the district centre.

Accessibility

4.2.11 The centre is highly accessible and served by sustainable modes of public transport with a number of bus stops situated in and around the centre, providing services to nearby settlements and Swansea city centre. Bus stops are located on Newton Road, Oystermouth Primary School (Newtown Road) and Oystermouth Square. The centre is also highly accessible via private car, with the A4067 linking to the nearby settlements in west Swansea including Sketty, Uplands and the city centre. The centre is served by a high level of car parking provision, including surface level car parks at the quarry and adjacent to the seafront off Mumbles Road. A number of on-street parking bays are situated on Newton Road and Mumbles Road. In summary, the centre is regarded as easily accessible to shoppers using a variety of transport modes.

Pedestrian Flows

4.2.12 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 in the district centre. High levels of footfall were observed at the eastern areas of Newton Road and Mumbles Road. Lower levels of pedestrian activity were observed at the western end of Newton Road, potentially due to the peripheral location at the edge of the district centre.

Environmental Quality

4.2.13 Generally, shopfronts and building facades are well maintained throughout the centre. Areas of public space including those adjoining Oyster Wharf and the promenade are well kept, clean and tidy. The centre is perceived as a safe and pleasant shopping environment, adding to the vitality of public areas in the town centre.

Summary

4.2.14 Mumbles district centre is considered to be buoyant and performing strongly, with a good representation of national multiples and a comprehensive offering of independent retailers. The centre benefits from a healthy mix of retail and services uses. The centre benefits from a low level of vacant units when considered against the national average. The centre is accessible by a variety of transport modes, with extensive 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.

4.3 Killay District Centre

4.3.1 Killay is a settlement in southwestern Swansea, situated between the settlements of Dunvant and Sketty, approximately 4.7 km west of Swansea City Centre. The Swansea Local Development Plan 2010-2025 (adopted 19th February 2019) identifies Killay as a district centre within the retail hierarchy. The centre extends along the northern extent of Gower Road and includes Goetre Fawr Road to the west. The centre is primarily focussed around Swan Court, a 1960's precinct set around an area of public space. The remainder of the centre is set in a linear form and addresses Gower Road.

Diversity of Uses

4.3.2 Tetra Tech Planning has investigated the composition of the centre based on the extent of the district centre outlined by the LDP Proposals Map. A breakdown of units is set out in the table below:

Type of Unit	August 2021		UK Average %
	No. Units	% Total	
Convenience	7	20.5	9%

Comparison	7	20.5	27%
Retail Services	9	26.4	15%
Leisure Services	7	20.5	24%
Financial & Business Services	4	11.7	9%
Vacant	0	0	14%
Total	34	100	100%

4.3.3 The convenience sector numbers 7 units, representing 20.5% of the centre. This level of provision is above the national average of 9%. Key operators within the convenience sector include Co-op Food, who operate from two locations within the centre.

4.3.4 The comparison sector accounts for 7 units. This level of provision accounts for 20.5% of the centre and operates 6.5% below the national average of 27%.

4.3.5 The retail service sector represents 26.4% of the centre, numbering 9 units in total. The sector operates 11.4% above the national average of 15%.

4.3.6 The leisure services sector represents 20.5% of the centre, accounting for 7 units. This level of provision is below the national average of 24%.

4.3.7 The financial and business services sector represents 11.7% of the centre, accounting for 4 units. This level of provision operates 2.7% above the national average of 9%.

Vacancies

4.3.8 No vacant units were identified during the centre survey. The low level of vacancies observed during the survey demonstrates the strength and vitality of the district centre.

Accessibility

4.3.9 The centre is highly accessible and served by sustainable modes of public transport with a number of bus stops situated in and around the centre, providing services to nearby settlements and Swansea city centre. Bus stops are located on Gower Road opposite the Black Boy public house and outside The Commercial public house. The centre is also highly accessible via private car, with the A4118 linking to the nearby settlements in west Swansea including Sketty, Uplands and the city centre. The centre is served by a high level of car parking provision, including surface level car parks at the rear of the shopping precinct. Additionally, a number of on-street parking bays are found on Gower Road. In summary, the centre is regarded as easily accessible to shoppers using a variety of transport modes.

Pedestrian Flows

4.3.10 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 in the district centre. High levels of footfall were observed within the shopping precinct and along

Gower Road near Co-op Food. Lower levels of pedestrian activity were observed at the western end of Gower Road, potentially due to the peripheral location at the edge of the district centre.

Environmental Quality

4.3.11 Generally, shopfronts and building facades are well maintained throughout the centre. Areas of public space within the shopping precinct are well kept, clean and tidy. The centre is perceived as a safe and pleasant shopping environment, adding to the vitality of public areas in the town centre.

Summary

4.3.12 Killay district centre is considered to be buoyant and performing strongly. The centre benefits from a healthy mix of retail and services uses, with strength seen in the convenience and retail service sectors – highlighting the role of the centre serving the local community. The lack of vacancies observed during the centre survey emphasises the strength and popularity of Killay district centre. The centre is accessible by a variety of transport modes, with good levels of car parking provision. The public realm throughout Killay 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.

4.4 Sketty District Centre

4.4.1 Sketty is a suburban settlement, situated between the neighbouring areas of Uplands to the east and Killay to the west, approximately 2.5km west of Swansea city centre. The Swansea Local Development Plan 2010-2025 (adopted 19th February 2019) identifies Sketty as a district centre within the retail hierarchy. The centre is primarily focussed around Sketty Cross, the junction of Gower Road and Vivian Road. The centre extends along three main streets, Gower Road and Vivian Road, alongside Eversley Road which lies east of Sketty Cross.

Diversity of Uses

4.4.2 Tetra Tech Planning has investigated the composition of the centre based on the extent of the district centre outlined by the LDP Proposals Map. A breakdown of units is set out in the table below:

Type of Unit	August 2021		UK Average %
	No. Units	% Total	
Convenience	5	8.1	9%
Comparison	10	16.3	27%
Retail Services	22	36	15%
Leisure Services	14	22.9	24%
Financial & Business Services	6	9.8	9%
Vacant	4	6.5	14%
Total	61	100	100%

- 4.4.3 The convenience sector numbers 5 units, representing 8.1% of the centre. This level of provision is marginally below the national average of 9%. Key operators within the convenience sector include Co-op Food and Tesco Express.
- 4.4.4 The comparison sector accounts for 10 units. This level of provision accounts for 16.3% of the centre and operates 10.7% below the national average of 27%.
- 4.4.5 The retail service sector represents 36% of the centre, numbering 22 units in total. The sector operates 21% above the national average of 15%.
- 4.4.6 The leisure services sector represents 22.9% of the centre, accounting for 14 units. This level of provision is below the national average of 24%.
- 4.4.7 The financial and business services sector represents 9.8% of the centre, accounting for 6 units. This level of provision operates at a comparable level to the national average.

Vacancies

- 4.4.8 Vacant units account for 6.5% of Sketty district centre, equivalent to 4 units. The level of vacancies operates at a level 7.5% below the national average of 14%, with vacant units generally well dispersed in the centre. The low level of vacancies observed during the survey demonstrates the strength and vitality of the district centre.

Accessibility

- 4.4.9 The centre is highly accessible and served by sustainable modes of public transport with a number of bus stops situated in and around the centre, providing services to nearby settlements and Swansea city centre. Bus stops are located on Gower Road outside Tesco Express and Dillwyn Road. The centre is also highly accessible via private car, with the A4118 linking to the nearby settlements in west Swansea including Killay, Uplands and the city centre. The centre is served by an adequate level of car parking provision, including a surface level car park off Eversley Road. Additionally, a number of on-street parking bays are found on Gower Road. In summary, the centre is regarded as easily accessible to shoppers using a variety of transport modes.

Pedestrian Flows

- 4.4.10 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 in the district centre. High levels of footfall were observed on Gower Road. Lower levels of pedestrian activity were observed at Eversley Road.

Environmental Quality

- 4.4.11 Generally, shopfronts and building facades are well maintained throughout the centre. Areas of public space within the shopping precinct are well kept, clean and tidy. The centre is perceived

as a safe and pleasant shopping environment, adding to the vitality of public areas in the town centre.

Summary

4.4.12 Sketty district centre is considered to be buoyant and performing strongly. The centre benefits from a healthy mix of retail and services uses, with strength seen in the retail service sector – highlighting the role of the centre serving the local community. The low level of vacancies observed during the centre survey emphasises the strength and popularity of Sketty district centre. The centre is accessible by a variety of transport modes, with good levels of car parking provision. The public realm throughout Sketty 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.

4.5 Uplands District Centre

4.5.1 Uplands is a suburban settlement, situated a short distance from central Swansea to the east and Sketty to the west. The district centre is located approximately 1.3km west of Swansea city centre. The Swansea Local Development Plan 2010-2025 (adopted 19th February 2019) identifies Uplands as a district centre within the retail hierarchy. The centre is primarily focussed along the route of Uplands Crescent and extends to Gwydyr Square in the south and The Grove to the north.

Diversity of Uses

4.5.2 Tetra Tech Planning has investigated the composition of the centre based on the extent of the district centre outlined by the LDP Proposals Map. A breakdown of units is set out in the table below:

Type of Unit	August 2021		UK Average %
	No. Units	% Total	
Convenience	6	11	9%
Comparison	9	16	27%
Retail Services	8	14	15%
Leisure Services	25	46	24%
Financial & Business Services	2	3	9%
Vacant	4	7	14%
Total	54	100	100%

- 4.5.3 The convenience sector numbers 6 units, representing 11% of the centre. This level of provision is marginally above the national average of 9%. Key operators within the convenience sector include Sainsbury's Local and Tesco Express.
- 4.5.4 The comparison sector accounts for 9 units. This level of provision accounts for 16% of the centre and operates 11% below the national average of 27%.
- 4.5.5 The retail service sector represents 14% of the centre, numbering 8 units in total. The sector operates 1% below the national average of 15%.
- 4.5.6 The leisure services sector represents 46% of the centre, accounting for 25 units. This level of provision is significantly above the national average of 24%.
- 4.5.7 The financial and business services sector represents 3% of the centre, accounting for 2 units. This level of provision operates 6% below the national average of 9%.

Vacancies

- 4.5.8 Vacant units account for 7% of Uplands district centre, equivalent to 4 units. The level of vacancies operates at a level 7% below the national average of 14%, with vacant units generally well dispersed in the centre. The low level of vacancies observed during the survey demonstrates the strength and vitality of the district centre.

Accessibility

- 4.5.9 The centre is highly accessible and well served by sustainable modes of public transport with a number of bus stops situated in and around the centre, providing services to nearby settlements of Sketty and Swansea city centre. Bus stops are located on Uplands Crescent opposite Tesco Express and outside of Brewstone. The centre is also highly accessible via private car, with Uplands Crescent linking to the nearby settlements in west Swansea including Sketty, Killay and the city centre. Off street parking in the locality is limited, with on-street parking bays found at the The Grove and Uplands Crescent. In summary, the centre is regarded as easily accessible to shoppers using a variety of transport modes.

Pedestrian Flows

- 4.5.10 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 in the district centre. High levels of footfall were observed on Uplands Crescent, with lower levels of pedestrian activity were observed at Gwydr Square.

Environmental Quality

- 4.5.11 Generally, shopfronts and building facades are well maintained throughout the centre. Areas of public space within the shopping precinct are well kept, clean and tidy. The centre is perceived as a safe and pleasant shopping environment, adding to the vitality of public areas in the town centre.

Summary

4.5.12 Uplands district centre is considered to be buoyant and performing strongly. The centre benefits from a healthy mix of retail and services uses, with strength seen in the leisure service sector – highlighting the role of the centre serving the local community. The low level of vacancies observed during the centre survey emphasises the strength and popularity of Uplands district centre. The centre is accessible by a variety of transport modes, with good levels of on-street car parking provision. The public realm throughout Uplands 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.

4.6 Sketty Park Local Centre

4.6.1 Sketty Park Local Centre is situated in the settlement of Sketty, a suburban area of west Swansea situated approximately 3.6 km west of Swansea city centre. The LDP identifies Sketty Park as a local centre within the retail hierarchy. The centre itself is modest in size and comprises only 11 units; including a small supermarket, public house, pharmacy, bakery, barbers shop, florist and fast food takeaway. Given the size of the centre the diversity of uses has not be compared with the national averages as per the preceding district centres. The centre comprises a mixture of convenience, comparison, retail and leisure services and demonstrates a retail offer that is consistent with the local centre's role serving the immediate community in Sketty Park.

4.7 Tycoch Local Centre

4.7.1 Tycoch Local Centre is situated in the settlement of Sketty, a suburban area of west Swansea situated approximately 3 km west of Swansea city centre. The LDP identifies Tyoch as a local centre within the retail hierarchy. The centre itself is modest in size and comprises only 12 units; including a convenience store, café, fast food takeaway, restaurant, post office, pharmacy, hairdressers and barber shop. Given the size of the centre the diversity of uses has not be compared with the national averages as per the preceding district centres. The centre comprises a mixture of convenience, comparison, retail and leisure services and demonstrates a retail offer that is consistent with the local centre's role serving the immediate community in Tycoch.

4.8 Bryn Y Mor Local Centre

4.8.1 Bryn Y Mor Local Centre is situated in central Swansea approximately 650 m west of Swansea city centre. The LDP identifies Bryn Y Mor as a local centre within the retail hierarchy. The centre itself is modest in size and comprises approximately 36 units; primarily comprising food and drink units within the leisure services sector. The centre also includes two convenience stores, a pharmacy and a small number of comparison units. Given the size of the centre the diversity of uses has not be compared with the national averages as per the preceding district centres. The centre comprises a mixture of convenience, comparison, retail and leisure

services, demonstrating a retail offer that is consistent with the local centre's role serving the immediate community within inner city Swansea.

4.9 West Cross Lane Local Centre

4.9.1 West Cross Lane Local Centre is situated in West Cross, a suburban settlement in west Swansea, situated approximately 6 km south-west of Swansea city centre. The LDP identifies West Cross Lane as a local centre within the retail hierarchy. The centre itself is small in size and comprises 6 units; including two convenience stores and takeaway restaurant. Given the size of the centre the diversity of uses has not be compared with the national averages as per the preceding district centres. The centre comprises a mixture of convenience, retail and leisure services, demonstrating a retail offer that is consistent with the local centre's role serving the immediate community in Westcross.

4.10 West Cross Alderwood Local Centre

4.10.1 West Cross Alderwood Local Centre is situated in West Cross, a suburban settlement in west Swansea, situated approximately 5.5 km south-west of Swansea city centre. The LDP identifies West Cross Alderwood as a local centre within the retail hierarchy. The centre itself is small in size and comprises 7 units; including a small supermarket/convenience store, hairdresser, café, pharmacy and takeaway restaurants. Given the size of the centre the diversity of uses has not be compared with the national averages as per the preceding district centres. The centre comprises a mixture of convenience, retail and leisure services, demonstrating a retail offer that is consistent with the local centre's role serving the immediate community in Westcross.

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.
- 5.1.2 Paragraph 2.8.9 of the LDP states that for proposals outside centres, the policy emphasises that as a starting point, the developer must demonstrate by means of suitable evidence whether there is a need for the proposed scheme.
- 5.1.3 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).
- 5.1.4 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.
- 5.1.5 Paragraph 2.8.10 of the LDP highlights the Swansea Retail and Leisure Study (R&LS 2015) which concludes that “...*there is not any quantitative need for additional convenience goods floorspace during the plan period, **which is a conclusion based on the overall scale of existing provision across the County.** It is crucial to note however the study recognises that this represents a **global capacity figure**, and it is feasible that, during the course of the Plan period a developer may be able to demonstrate a degree of quantitative need for new convenience provision having regard to changing circumstances such as commitments for housing growth **within a given catchment.** Developers will need to use appropriate methodologies and up to date evidence and survey data in order to identify any such need.*” (Tt emphasis)
- 5.1.6 Whilst an element of precedence is apportioned to quantitative need in PPW, it states that qualitative need and other factors are material considerations when considering need, with the weight apportioned being a matter for the decision-maker in each individual case. It is within the gift of the decision maker to apportion weight to qualitative indicators of need and other material considerations.
- 5.1.7 In assessing need Swansea Council's Retail & Leisure Study 2015 (R&LS 2015) is utilised as a source of information e.g. from household survey information underpinning the R&LS 2015 however the quantitative analysis of existing stores/centre turnovers, where appropriate, has

been update utilising the latest benchmark sales density and price base information, as appropriate.

5.2 Quantitative capacity

5.2.1 The below quantitative capacity analysis is not a global capacity analysis; instead, it appropriately focusses on the proposed development's primary catchment, given this is the catchment from which the proposed foodstore is likely to predominantly draw its trade; this effectively constitutes Zone 4 of the R&LS 2015 Study Area i.e. West Swansea/ Gower.

5.2.2 The tables below provide a summary of the existing market share/ shopping patterns associated with Zone 4 and the neighbouring Zone 1, drawn from Table 4 of the Council's R&LS 2015.

Table 1: Convenience Goods market share – Zone 1 & 4 - Swansea R&L Study 2015

	First choice main food %		Second choice main food %		Top up food %	
	Zone 1	Zone 4	Zone 1	Zone 4	Zone 1	Zone 4
Swansea City Centre (Zone 1)	37.2%	44.10%	28.8%	38.60%	19.70%	7.80%
Mumbles (Zone 4)	0.0%	4.30%	0.0%	4.30%	1.60%	31.30%
Killay (Zone 4)	1.1%	2.20%	3.0%	8.60%	4.90%	23.40%
Sketty (Zone 1)	0.0%	0.00%	10.6%	0.00%	27.90%	0.00%
Gorseinon (Zone 3)	3.2%	8.60%	1.5%	11.40%	1.60%	3.10%
Uplands (Zone 1)	2.1%	0.00%	0.0%	0.00%	4.90%	0.00%
Gowerton (Zone 4)	0.0%	0.00%	0.0%	0.00%	0.00%	6.30%
Local Centres (within Swansea)	4.3%	0.00%	1.5%	0.00%	4.90%	4.70%
Out of Centre (and retail parks) within Swansea	50.0%	34.40%	48.5%	34.30%	32.80%	18.80%
Other (outside Swansea)	2.1%	6.50%	4.5%	2.90%	1.60%	4.70%

Source: Derived from Table 4 Swansea R&L Study 2015

Table 2: Convenience shopping patterns Zone 1 & 4 (R&L Study 2015)

	First choice main food	Second choice main food	Top-up food
Zone 1 residents to Zone 1 based centres (<i>highlighted green Table 1</i>)	39.3%	39.4%	52.50%
Zone 1 residents to Zone 4 based	1.1%	3.0%	6.50%

centres (<i>highlighted yellow Table 1</i>)			
Zone 4 residents to Zone 4 based centres (<i>highlighted Orange Table 1</i>)	6.50%	12.90%	61.00%
Zone 4 residents to Zone 1 based centres (<i>highlighted Blue Table 1</i>)	44.10%	38.60%	7.80%

Notes: Excludes local centres, out of centre and other destinations

- 5.2.3 The above analysis of shopping patterns identified in the R&LS 2015 highlights that while the majority of PCA (Zone 4) based residents carry out top up food shopping locally in Zone 4, a very low proportion carry out main food shopping locally (as first or second choice destinations). Instead, it highlights a significant proportion of Zone 4 based residents carry out main food shopping beyond Zone 4 in Zone 1 (highlighted blue above). These patterns strongly indicate:
- 5.2.4 PCA (Zone 4) based centres do not draw notable levels of trade from Zone 1 based residents, who, given the relative wealth of choice of competition, typically shop locally in Zone 1 for main food and top up food needs. Zone 1 residents are better catered for in respect of locally based main food shopping facilities.
- 5.2.5 The above analysis strongly demonstrates in quantitative terms the PCA (Zone 4) is not currently well catered for in respect of meeting main food shopping needs locally and indeed there is a local need for improved convenience provision to counteract the unsustainable shopping patterns associated with the leakage of trade.
- 5.2.6 It is important to note there are currently **no limited assortment discounters (LADs)** such as Lidl (and Aldi) in the PCA (Zone 4). Zone 1 (and Zone 3) are already catered for by LADs. The above analysis suggests, as is currently the case with existing stores, the proposed store is not likely to draw notable levels of trade from beyond its PCA.
- 5.2.7 The proposed store is scaled to meet main food shopping needs locally. Given its nature, size, location, and the location of competing facilities, the proposed foodstore is expected to cater predominantly to PCA/Zone 4 based residents in order to address the identified deficiency.

Expenditure Capacity analysis

- 5.2.8 The below table provides simple convenience expenditure capacity analysis within the PCA at 2026 i.e. the design year of the proposed store.

Table Expenditure Capacity

	2021	2026
[1] Available Convenience Expenditure in PCA (£m) (Zone 4)	118.7	119.4
[2] Total Conv Benchmark turnover of existing stores in PCA (£m)	53.7	54.1
[3] PCA derived Conv turnover of proposed development (£m)	8.2	8.2

[4] Turnover of Convenience Retail Commitments in PCA (£m)	0.0	0.0
[5] Total PCA derived turnover (£m)	61.9	62.3
[6a] PCA convenience surplus expenditure capacity (£m)	56.7	57.1

Source: Table 8 Appendix 2

- 5.2.9 The above table provides an assessment of the available convenience expenditure in the PCA and turnovers of existing stores to help identify whether there is 'capacity' for the proposed foodstore. It can be seen from the above table, accounting for existing store and the proposed store there is clear quantitative capacity in the PCA to support the proposed additional store in 2026 (i.e. design year).
- 5.2.10 In respect to comparison retail capacity Table 5 of Appendix 2 demonstrates comparison expenditure in the catchment area is projected to increase from 2021 to 2026 by c.13% (£26.54m). Lidl is not a comparison goods-led facility/destination. Non-food goods are sold based on an ever-changing product range on an ad hoc basis and typically form impulse purchases associated with a food shop. Notwithstanding this, it is clear additional local floorspace provision will be needed to help meet future needs in 2026, given the identified growth in comparison expenditure. It is entirely sensible therefore that to help meet this capacity a modest quantum of additional comparison floorspace is provided as ancillary provision at the proposed foodstore in 2026.

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 the fact that Lidl is taking the significant commercial investment decision to develop a new store on Mumbles Road, despite being represented elsewhere in Swansea (with its existing stores serving materially different catchments). This, itself, is a very strong indication itself of a) the degree of local need in the existing customer base in the PCA; and b) the importance of increased representation in Swansea to meeting local need.

Limited Assortment Discounters (LADs) - meeting local consumer need

5.3.4 At 1,414sqm net in total the proposed store is modestly scaled by supermarket standards. Notwithstanding this, it is the latest generation 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 layout is well equipped to cater for its shoppers; those that favour the LAD format.

Counteract unsustainable shopping patterns

5.3.5 As outlined above the proposed store seeks to ensure local shopping requirements continue to be adequately met at Mumbles. In doing so, shoppers will be disinclined from generating unsustainable travel patterns by shopping further afield.

5.3.6 A proportion of 'leakage' is generally to be expected to higher order centres in the region; however, by enhancing existing provision in the PCA, Mumbles 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 Mumbles retail environment with improved local representation. The store will introduce a materially different retail offer to Mumbles. The site is commercially prominent and highly 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 store will introduce a materially different retail offer to Mumbles and counteract unsustainable high levels of leakage to competing stores further afield. Improved retail provision will help local needs being 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 lies at 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 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.” (WYG 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

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

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 the identified district and local centres 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 requirements to meet the needs of the proposed development have been taken to be:

- A site that can accommodate a store in excess of 2,100 sqm gross to allow for provision of enhanced customer choice based on a full product range offer. The need to relocate to a larger store will address the deficiencies of the existing store, 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 Swansea LDP proposals map has revealed there are no dedicated retail allocations within or in close proximity to the studied retail centres. As such, the sequential site search has focussed upon the results of the town centre health check survey undertaken by Tetra Tech Planning, which informed the GOAD plan data utilised in this report. A list of vacant units is provided below:

Unit Location	Size (sqm)	Description
14 Newton Road, Mumbles	60	Vacant retail unit
10 Newton Road, Mumbles	70	Vacant bank
60 Newton Road, Mumbles	80	Vacant leisure unit
69 Newton Road, Mumbles	80	Vacant retail unit
97 Newton Road	80	Vacant retail unit
47 Gower Road, Sketty	75	Vacant retail unit
29 Gower Road, Sketty	80	Vacant bank
23 Gower Road, Sketty	50	Vacant retail unit
23 Uplands Crescent, Uplands	50	Vacant bank
43 Uplands Crescent, Uplands	50	Vacant retail unit
54 Uplands Crescent, Uplands	60	Vacant retail unit
56 Uplands Crescent, Uplands	60	Vacant retail unit

6.4.4 Whilst a number of the vacant units outlined above were observed to be available during the centre health check survey, the sequential site search of vacant units within studied retail centres highlights the constrained, relatively small size of units within the district and local centres. All of the vacant units listed above are physically too small to accommodate the required floorspace of the proposed development. 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 centres. 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 foodstore, with particular regard to Mumbles and other PCA based centres.

7.1.2 PPW paragraph 4.3.26 advises that for development of 2,500sqm gross or more an impact assessment should accompany planning applications for main town centre uses that are not in a centre. It is important to note from the outset of this chapter that, at 2,194qm gross (1,102sqm net) the proposed development 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 latest population, expenditure, benchmark sales density and turnover information.

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:

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

7.2.3 The catchment area is outlined at Appendix XX. 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

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

7.2.5 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.

7.2.6 **Step 3 - Assess turnover and trade draw.**

7.2.7 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.

7.2.8 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.

7.2.9 Set out the likely impact of the proposal clearly, along with associated assumptions and reasoning, in respect of quantitative and qualitative issues.

7.2.10 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.

7.2.11 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.

7.2.12 The assessment utilises population projections obtained from Experian and expenditure per capita estimates obtained from Experian. The assessment utilises a 2018 price base throughout.

7.2.13 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.

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

7.4 Impact on allocated sites outside centres

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

Cumulative effects of the development

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

7.4.3 We note since the publishing of the Swansea R&LS 2015 there has been the grant of planning consent for other notable convenience retail stores which include:

- M&S Food at Norton Road, Mumbles District Centre;
- Coop, Mumbles Road, Mumbles District Centre;
- Coop, Linden Avenue, West Cross (COU of former Linden Tree Pub) (out of centre);
and
- Coop, Brynmill Terrace, Brynmill (out of centre).

7.4.4 The above stores have been developed and are trading. Given the stores now form part of the local retail environment the quantitative impact assessment duly takes account of the above stores in its analysis.

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

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

7.5.2 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.

7.5.3 The following paragraphs assess the potential impact of the proposal on in-centre turnover. The current health of centres is considered (see chapter 4, above), before conclusions are drawn on the impact on in-centre turnover and trade

7.5.4 In considering impact on in-centre trade this section draws on the assessed retail turnover of the proposal and also considers growth in 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

7.5.5 Turnover

7.5.6 Turnover is set out in detail in at Appendix 2. The annual turnover of the proposed additional floorspace is assessed to be c.£10.8m 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 2025 is therefore assessed to be £9.7m.

7.5.7 Expenditure Growth

7.5.8 The tables provided in Appendix 2 apply local estimates of expenditure per person to the resident population within the study area in order to forecast the available retail expenditure generated over the period to 2026.

Table Expenditure growth within PCA, 2021-26

Year	Population	Total Convenience Expenditure	Total Comparison Expenditure
2021	50,936	£118.66m	£197.54m
2026	51,572	£119.42m	£224.08m
Expenditure	£m	£0.76m	£26.54m
Growth 2021-2026	%	0.64	13.44

7.5.9 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.

7.5.10 As outlined in the preceding Need section, the above analysis alone demonstrates there is sufficient expenditure growth to support any additional comparison turnover associated with the store. 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. Given Lidl is not, in

itself, a comparison goods destination 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. Notwithstanding this, further to the Council's pre-application request the impact assessment includes comparison goods trade diversion analysis.

Trading Assessment

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

7.5.12 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.

7.5.13 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.

7.5.14 The analysis is based on an assessment of existing stores/centre turnovers derived from the latest benchmark sales density information and, where available, from household survey information underpinning the Swansea Retail Study Update 2015 updated as appropriate.

7.5.15 The trading assessment provided considers the convenience and comparison turnovers of the stores/centre. 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 9c considers the overall impact of PCA based centres.

- 7.5.16 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.
- 7.5.17 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.
- 7.5.18 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

- 7.5.19 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.
- 7.5.20 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 centres/stores within the catchment within the period to 2026. However, Table 9a/b highlights that the catchment is predominantly served by large out of centre foodstores which, broadly speaking, are trading strongly. These stores are anticipated to continue to trade strongly following the proposed foodstore.
- 7.5.21 Table 9a-c at Appendix 2 demonstrate the effects of the proposed foodstore is anticipated to be predominantly felt by large and/or comparably scaled foodstore, 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.
- 7.5.22 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.
- 7.5.23 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.

7.6 Summary

- 7.6.1 In summary, the proposed development constitutes the proposed development of a LAD store which is intended to materially improve the choice of local shoppers in Mumbles and the surrounding catchment. The store measures 2,194sqm gross which is comfortably below the PPW floorspace threshold, nonetheless however a proportionate impact assessment has been provided.
- 7.6.2 The assessed impacts of the proposed development are within acceptable levels, many of which fall on similarly scaled out of centre, unprotected destinations/facilities. The analysis demonstrates existing centres are well equipped to absorb the relatively modest anticipated trading impacts, 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 and nor does it unacceptably affect vitality and viability at PCA based centres.

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
- Flood Risk
- Drainage
- Ecology
- Air Quality
- Noise
- Economic Benefits

8.2 Principle of Development

8.2.1 The Swansea LDP 2010 – 2025 Proposals Map indicates the site occupies a position inside the settlement boundary. The application site is not allocated for a specific use within the LDP and appears as 'white land' as per the Proposals Map. Policy PS1: Sustainable Places proposes 'development to be directed to the most sustainable locations within the defined settlement boundaries of the urban area'. Furthermore, the supporting policy text confirms Swansea's urban area as the primary focus for growth and the most sustainable location for major development. On this basis, the proposals are considered to comply with Policy PS1: Sustainable Places given its location inside the settlement boundary, establishing a basic principle of development at the application site.

8.3 Sustainability

8.3.1 In addition to the site's compliance with Policy PS1: Sustainable Places outlined above, 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. In respect of surroundings, the application site is situated in close proximity to the populous areas of Sketty, to the north and Mayals / West Cross to the south. The subject site is therefore situated within an established settlement pattern. In addition to the site's sustainable spatial setting, the site is also very well connected to sustainable public transport links. The nearest bus

stop is situated approximately 200m north west of the site on Mumbles Road, a frequently served public transport corridor which provides access to the 1, 2, 2A, 2B, 2C, 3A, 14 and 37 bus services. Additionally, the subject site is well suited to take advantage of active travel opportunities, with a good standard of pavements and pedestrian footpaths in the immediate locality, alongside the off road Swansea Bay Bike Path found approximately 130m south east of the site.

8.3.2 Therefore, the development occupies a wholly sustainable location and complies with the principles of sustainable settlement development. In summary, the proposed development is considered highly sustainable and in accordance with Policy PS1: Sustainable Places.

8.4 Highways and Access

8.4.1 A Transport Assessment has been prepared by Corun Associates in support of the application. Vehicular access to the site is proposed to be upgraded to a new T-junction arrangement along the A4067 Mumbles Road, with a DMRB compliant extended right turn lane (providing stacking distance for at least 6 vehicles). The existing traffic island along the site frontage on the A4067 Mumbles Road is to be removed as part of this new access arrangement, with carriageway widening into the adopted highway / verge proposed to facilitate this extension.

8.4.2 The new access will be designed to allow sufficient space for a max legal 16.5m articulated vehicle to safely manoeuvre in and out of the site. Visibility splays well in excess of 200m would also be achievable in both directions.

8.4.3 Pedestrian access to the proposed development will also be provided at this existing access point. 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 A4067 Mumbles Road.

8.4.4 The proposed development (and change of use from petrol filling station to Lidl store) is predicted to generate an additional +172 and +1,056 two-way vehicular trips to the site over the 12-hour period (0700 to 1900) on a weekday and Saturday respectively. The greatest increase in trips on a weekday is seen between 1400 to 1500 (+63 trips), and between 1200 to 1300 on a Saturday (+147 trips).

8.4.5 A robust highway impact assessment has been undertaken identifying that over the 12-hour weekday period between 0700 to 1900, the proposed development would lead to an increase in traffic of just +0.7% along the A4067 Mumbles Road (in the vicinity of the site), with a -2.2% decrease in trips generated during the AM highway peak hour (0800 to 0900), and a just a +1.4% increase in trips during the PM highway peak hour (1500 to 1600).

8.4.6 Over the 12-hour Saturday period, the proposed development would lead to an increase in traffic of +4.5% along the A4067 Mumbles Road, with a +6.1% increase in trips during the Saturday highway peak hour (1200 to 1300). These values represent a 'worst case' scenario, and do not include any reductions expected as a result of 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.

- 8.4.7 A review of the accident record along the A4067 Mumbles Road in the vicinity of the site does not identify any significant highway safety issue within the immediate area of the development site, and the minor increase in traffic generated by the proposed development is highly unlikely to exacerbate the existing safety record to a significant enough level to warrant concern.
- 8.4.8 The junction capacity assessments have identified that both the proposed site access junction, and the neighbouring A4067 / Derwen Fawr Road junction to the site would both be expected to operate well within theoretical capacity with the proposed development in place. The assessment at the A4067 / Derwen Fawr Road junction assessment has also identified that the change in use on the site will have a minimal effect on the operation of this junction.
- 8.4.9 A Travel Plan will also be developed as part of the proposals, which aims to maximise active modes of travel and public transport use associated with the site. In summary, the Transport Assessment demonstrates that the development should be considered both acceptable and policy compliant in terms of highways and transportation.

8.5 Vehicle Parking

- 8.5.1 The development proposal includes 50 parking spaces on the site, made up of 37 (74%) standard parking spaces, 4 (8%) for disabled customers, 7 (14%) parent and child spaces, and 2 (4%) electric vehicle charging spaces. This level of provision is within the Swansea Council maximum parking requirement for a development of this type, and conforms with national policy aims to target a reduction in car occupancy levels at new developments. A minimum of 4 Sheffield cycle stands will be provided at the development, which will allow parking for a minimum of 8 bicycles. This provision will help encourage this mode of travel.

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. 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 main elevations façade treatment will consist of a mixture of materials. The external walls to be white render (RAL 9010), grey plinth (RAL 7038) below. Natural stone and timber cladding bays along North, South and West elevations break the elevation into individual elements.
- 8.6.2 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.

- 8.6.3 The ecological and environmental side has been considered also as part of the proposal. The store will have a 3 degrees mono pitched roof. The use of a sedum blanket will be adopted and layed above a 50mm sedum substrate to create a green roof. The sedum roof will provide an attractive, bio-diverse and sustainable roof finish visible to the customers visiting the store.
- 8.6.4 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 Landscape Strategy drawing.
- 8.6.5 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 PS2: Placemaking and Place Management of the LDP.

8.7 Flood Risk

- 8.7.1 A Flood Consequences Assessment has been prepared by WSP in support of the application. The FCA indicates the site contains a significant portion of DAM Zone C2, where Less Vulnerable Developments such as retail may be permissible, subject to the acceptability of consequences, the Justification Test and surface water drainage requirements. Although the site is considered to be at a low risk of flooding from most sources, a risk of fluvial flooding has been identified. The current ground levels on the site, being lower than the design flood level, require raising in order to comply with TAN15 requirements. Raising the Finished Floor Levels (FFL) and including additional mitigative measures as set out in the recommendations of the FCA would improve compliance with TAN15; however, some aspects such as access/egress may not fully comply with guidance under all conditions. It should be noted that the acceptability of the access/egress arrangement is a matter for the Local Authority and can be managed through an Emergency Flood Plan.

8.8 Drainage

- 8.8.1 A Drainage Strategy Report has been prepared by WSP in support of the application. Surface water flows from the site are to be restricted to a maximum allowable rate of 5.1 litres per second, which reflects greenfield conditions and when compared with the historical brownfield runoff provides a 78% betterment against the 1 in 2yr return period event. The surface water connection and discharge rate are to be agreed upon with the LLFA and DCWW. Surface water flows are proposed to discharge to the public surface water 300mm vitrified clay surface water sewer located within site.
- 8.8.2 As the proposed development is restricted in terms of size, it is not possible to include multiple green surface SuDS assets such as swales, ponds, or detention basins. Multiple benefits can still however be recognised through the proposed bioretention features and green roof shown within the strategy.
- 8.8.3 Flows from the green roof are to drain into the permeable paving and voided subbase lined with an impermeable membrane. A flow control device is to be fitted to outlet of the voided subbase,

restricting flows to the maximum allowable discharge rate of 5.1 litres per second. Pollution index ratings for commercial roofing using suitable materials is classed as very low and source control treatment is provided by the green roof system through filtration at source.

- 8.8.4 Amenity is provided through the raingardens that define clear boundaries throughout the development, contributing to a safer and calmer environment for pedestrians in/around trafficked areas. Introducing raingardens/bioretenion into the development, accounting for up to 275m² (6.7% of the total area), will only improve on the existing scenario.
- 8.8.5 The green roof is to occupy 96% of the total roof area of the Lidl store. Whilst access to the roof is restricted, amenity benefits cannot be fully recognised, however, there may be an opportunity here to alter the planting specification in collaboration with the County Ecologist to provide enhanced biodiversity. This would provide a more biodiverse situation to that of the historical site that was mostly hard paved. The proposed development is to be maintained by a facilities management company employed by the developer. Funding for the maintenance of the building and external areas will be made by commercial occupants, as standard practice for this type of development. The proposed SuDS assets will require regular inspection and maintenance as part of the maintenance schedule for the development.
- 8.8.6 In summary, the scheme addresses the requirements of the Statutory Standards and is considered policy compliant.

8.9 Ecology

- 8.9.1 An Ecological Appraisal has been undertaken by Tetra Tech in support of the application and includes a desk-based study and an extended Phase 1 Habitat Survey of the site. The Appraisal finds on site habitats are dominated by hard standing, two buildings, amenity grassland and a defunct hedgerow. There is a tree line along the southwestern and north-western boundary of the site however these are outside the redline boundary. The buildings have up to moderate suitability for roosting bats and the defunct hedgerow offers some opportunities for common garden birds, reptiles, and hedgehog. The remaining habitats have limited ecological value. In respect of recommendations, the Appraisal indicates an emergence/re-entry bat of two buildings situated on-site should be undertaken to inform the planning application. The Appraisal recommends the following measures to reduce potential impacts:

- Precautionary avoidance measures for reptiles, breeding birds and hedgehog;
- Sensitive lighting adopted on site, to minimise impacts upon foraging/ commuting bats and other wildlife;
- Hoarding to be erected around the construction as precautionary approach for qualifying birds associated with Blackpill Swansea SSSI;
- Removal and treatment of Himalayan Balsam to be completed prior to the commencement of works;

- A CEMP should be produced prior to construction commencing;
- Incorporate locally sourced, nursery grown, native stock, to provide a variety of valuable habitats for wildlife. Structurally diverse vegetation and inclusion of evening-blooming plants will attract insects which in turn will help to enhance the site for wildlife;
- Maintain and enhance the wildlife corridor along the north-western boundary of the site; and
- Given the limited space to enhance the green infrastructure on site, considerations should be given to a green roof or green walls and rain gardens.

8.10 Air Quality

8.10.1 An Air Quality Assessment has been prepared by Tetra Tech in support of the application. The primary source of the air quality associated with the proposed scheme is from vehicle movements, arriving and departing the proposed development. During the construction phase the potential effects during the demolition and construction phases include fugitive dust emissions from site activities, such as earthworks, construction and trackout. During the construction phase, site specific mitigation measures set out within the assessment will be implemented. With these mitigation measures in place, the effects from the construction phase are not predicted to be significant.

8.10.2 In respect of the operation phase, detailed dispersion modelling of traffic pollutants has been undertaken for the proposed development. An operational year assessment for 2023 traffic emissions has been undertaken to assess the effects of the Proposed Development. The impacts during the operational phase take into account exhaust emissions from additional road traffic generated due to the proposed development. The long-term (annual) assessment of the effects associated with the proposed development with respect to Nitrogen Dioxide (NO₂) is determined to be 'negligible'. With respect to PM₁₀ and PM_{2.5} exposure, the effect is determined to be 'negligible' at all identified existing sensitive receptor locations.

8.10.3 Given the quantitative nature of the assessment and the verification of the air quality dispersion model, the level of accuracy of the assessment results is considered to be 'high'. The Assessment concludes the development is not considered to be contrary to any of the national and local planning policies regarding air quality.

8.11 Noise

8.11.1 A Noise Impact Assessment has been prepared by Tetra Tech in support of the application. The report considers the potential noise impact of noise sources including: building services plant, HGV movements, HGV unloading/loading, customer car parking and customer noise. Baseline noise monitoring has been undertaken and the results of the baseline survey along with CadnaA noise propagation modelling have subsequently been used to establish maximum noise levels for proposed plant to meet the requirements of BS 4142.

- 8.11.2 Mitigation has been proposed in the form of a 2.0m noise barrier to the north-east of the site, and a hybrid 4.0m/2.5m noise barrier to the south of the site; the results of the assessment demonstrate that, inclusive of this mitigation, operational noise from the site is predicted to be below relevant WHO/BS:8233 noise intrusion criteria.
- 8.11.3 Therefore, the proposed development is not expected to have an adverse impact on health or quality of life and the requirements of Planning Policy Wales to incorporate measures to reduce noise levels are considered to be met.

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).

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 Swansea Council for the demolition of an adjacent residential dwelling and the erection of a supermarket, car parking, landscaping and all associated works at the former Halfway Garage, Blackpill, Swansea.

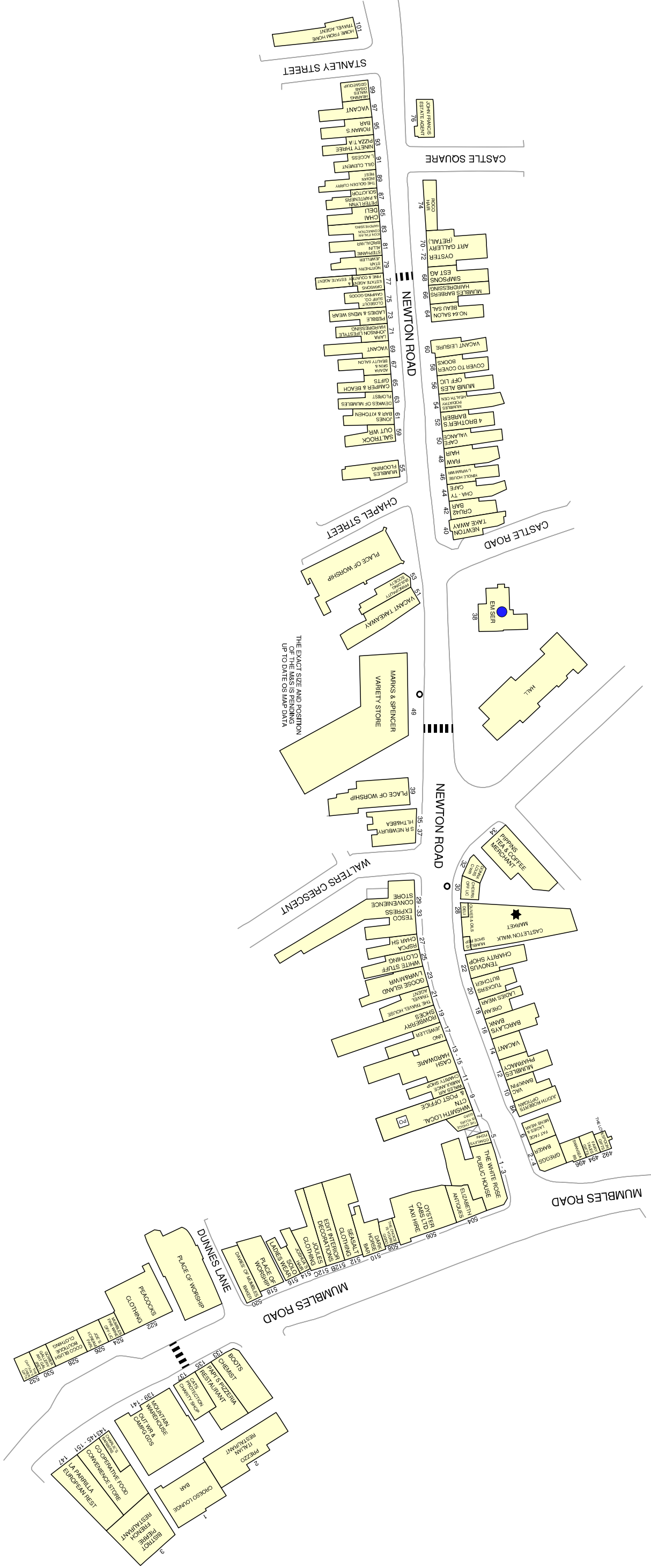
9.1.2 In light of the above findings we make the following conclusions:

- Quantitative and qualitative need for the proposed development has been demonstrated. The store will introduce a materially different retail offer to Mumbles and counteract unsustainable high levels of leakage to competing stores further afield. Improved retail provision will help local needs being met locally.
- The proposed development constitutes the proposed development of a LAD store which is intended to materially improve the choice of local shoppers in Mumbles and the surrounding catchment. The store measures 2,194sqm gross which is comfortably below the PPW floorspace threshold, nonetheless however a proportionate impact assessment has been provided.
- The assessed impacts of the proposed development are within acceptable levels, many of which fall on similarly scaled out of centre, unprotected destinations/facilities. The analysis demonstrates existing centres are well equipped to absorb the relatively modest anticipated trading impacts, 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 and nor does it unacceptably affect vitality and viability at PCA based centres.
- 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.

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, noise & air quality.

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 – Mumbles GOAD Plan



THE EXACT SIZE AND POSITION OF THE MASS IS PENDING UP TO DATE OS MAP DATA

MUMBLERS ROAD

CASTLE SQUARE

NEWTON ROAD

CHapel STREET

STANLEY STREET

WALTERS CRESCENT

DUNNES LANE

NEWTON ROAD

CASTLE ROAD

CASTLETON WALK MARKET

MARKS & SPENCER VARIETY STORE

BARCLAYS BANK

TESCO EXPRESS

WALMART

MUMBLETS BAR & RESTAURANT

LA PARRILLA

PREZZO

CHOCOLATE LOUNGE

BAR

RESTAURANT

PIZZERIA

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Appendix 2 – Retail Assessment Tables

Lidl Great Britain Ltd
Mumbles Road, Swansea
Statistical tables

Table 1: Population

Zone	2021	2022	2023	2024	2025	2026	2021-2026	
							No.	%
	[1]					[2]	[3]	[4]
Catchment Zone 4	50,936	51,061	51,227	51,373	51,459	51,572	636	1.3
Total	50,936					51,572	636	1.2

Notes:

Population projections obtained from Experian Micromarketer MMG3 Profile Report

[3] = [2] - [1]

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

Lidl Great Britain Ltd
Mumbles Road, Swansea

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

Zone	2021	2022	2023	2024	2025	2026
Zone 4	£2,330	£2,334	£2,327	£2,323	£2,320	£2,316

Notes:

per capita figures taken from Experian MMG 3 report
subsequent years projected forward in accordance with growth rates set out in
App 3 of EXRPBN 18 Oct 2020 - growth in sales volumes (exc adj. sales via stores)

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

Zone	2021	2022	2023	2024	2025	2026
Zone 4	3,878	3,991	4,098	4,180	4,260	4,345
Total						

Notes:

per capita figures taken from Experian MMG 3 report
subsequent years projected forward in accordance with growth rates set out in
App 3 of EXRPBN 18 Oct 2020 - growth in sales volumes (exc adj. sales via stores)

2018 prices

Lidl Great Britain Ltd
Mumbles Road, Swansea

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	118.66	119.19	119.21	119.31	119.39	119.42	0.76	0.64

Notes:

[1] & [2] Derived by multiplying the population (Table 1) with expenditure per capita per zone (Table 2).

[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	197.54	203.76	209.95	214.76	219.20	224.08	26.54	13.44

Notes:

[1] & [2] Derived by multiplying the population (Table 1) with expenditure per capita per zone (Table 2).

[3] = [2] - [1]

[4] = [3]%

2018 prices

Lidl Great Britain Ltd
Mumbles Road, Swansea

Table 6: 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	2,194	1,102					
<i>convenience</i>			882	10,346	9.1	9.1	8.2
<i>comparison</i>			220	6,642	1.5	1.7	1.5
Total					10.6	10.8	9.7

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 2018 price base)

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

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

[7] = assumes 90% 2021 PCA Turnover

[8] = assumes 90% 2026 PCA Turnover

2018 prices

Table 7: Existing Store/Centre Turnovers, 2021

	Gross floorspace	Net Floorspace		Sales Density		Turnover 2021 (£m)		Total (£m)
	(sqm)	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison	
	[1]	[2]		[3]		[4]	[5]	[6]
Primary Catchment Area								
Mumbles								
Mumbles DC							3.73	3.73
Tesco Express	350	315		12,990		4.09		4.09
Coop		220		10,963		2.41		2.41
M&S		820		10,121		8.30		8.30
Killay								
Killay DC							0.53	0.53
Coop Gower Rd	407	366		10,963		4.01		4.01
Coop The Precinct	257	231		10,963		2.53		2.53
Sketty								
Sketty DC							0.53	0.53
Sainsburys local, Gower Rd	186	177		11,312		2.00		2.00
Tesco Express, Gower Road	224	202		12,990		2.62		2.62
Local shops						2.22		2.22
Uplands								
Uplands DC							2.88	2.88
Local shops						0.40		0.40
Sainsbury's Local, Uplands Crescent	186	167		11,312		1.89		1.89
Tesco Express, Uplands Crescent	186	167		12,990		2.17		2.17
Gowerton								
Gowerton DC							0.32	0.32
Coop, Sterry Road		354		10,963		3.88		3.88
CK Supermarket, Sterry Road		220		3,500		0.77		0.77
Local Centres								
West Cross (Alderwood Road)		175		3,500		0.61		0.61
West Cross (West Cross Lane)		70		3,500		0.25		0.25
Brynmor Road		120		3,500		0.42		0.42
Sketty Park (CKs)		550		3,500		1.93		1.93
Tycoch (Tycoch Cross) (Coop)		210		3,500		0.74		0.74
Penclawdd (CKs)		950		3,500		3.33		3.33
Out of centre								
Coop Brynmill		120		10,963		1.32		1.32
Coop West Cross (old linden tree pub)		400		10,963		4.39		4.39
Coop Bishopston		130		10,963		1.43		1.43
Tesco Express, Bryn Y Mor Road, Gowerton	175	157		12,990		2.04		2.04
Beyond PCA								
Swansea City Centre								
Swansea city centre							384.47	384.47
Coop Plymouth St, Swansea	260	247		10,963		2.71		2.71
Iceland, St Davids Square	510	459		6,521		2.99		2.99
M&S, Oxford St	1,370	1,301		10,121		13.17		13.17
Tesco, Albert Row, Oystermouth Rd	3,238	2,105		12,990		27.34		27.34
Out of centre								
Coop, Meridian Quay, Trawler Rd	186	177		10,963		1.94		1.94
Sainsbury's, Quay Parade	4,670	3,035		11,312		34.33		34.33
Tesco Express, De La Beche St	195	186		12,990		2.42		2.42
Parc Tawe							17.30	17.30
Lidl, Parc Tawe North	929	743		10,346		7.69		7.69
Florestfach area (Pontarddulais RP)							8.73	8.73
Morfa Shopping Park							89.99	89.99
Other retail warehouses							86.05	86.05

Notes

[1] [2] Centres taken from Swansea RLS 2015 table 8 or T1 estimate where unspecified

[3] sales densities taken from Mintel RR18 at 2018 price base or T1 estimate where unspecified

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

[5] taken from Swansea RLS 2015 Table 7b grown forward to 2021 based on growth rate outlined in Table 5, at 2018 price base

[6] = [4]+[5]

Table 8: Capacity for additional convenience floorspace to 2026

	2021	2026
[1] Available Convenience Expenditure in PCA (£m) (Zone 4)	118.7	119.4
[2] Total Conv Benchmark turnover of existing stores in PCA (£m)	53.7	54.1
[3] PCA derived Conv turnover of proposed development (£m)	8.2	8.2
[4] Turnover of Convenience Retail Commitments in PCA (£m)	0.0	0.0
[5] Total PCA derived turnover (£m)	61.9	62.3
[6a] PCA convenience surplus expenditure capacity (£m)	56.7	57.1
[6b] Estimated (retained) market share of PCA expenditure (%)	52.2	52.2

Notes

[1] Taken from Table 4

[2] Derived from Table 7. Projected forward to 2026 on basis that facilities gain from a pro-rata growth in expenditure (0.64%), as set out at Table 4.

[3] Taken from table 6 a

[4] no known convenience commitments

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

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

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

2018 Prices

Lidl Great Britain Ltd
Mumbles Road, Swansea

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

	Turnover		Trade Draw to Proposed Development		Residual	Impact			
	2021	2026	%	£m	£m	£m	%	£m	%
	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]
Primary Catchment Area									
Mumbles									
Tesco Express	4.09	4.12	2	0.18	3.94	-0.16	-3.82	-0.18	-4.43
Coop	2.41	2.43	2	0.18	2.24	-0.17	-6.32	-0.18	-7.52
M&S	8.30	8.35	2	0.18	8.17	-0.13	-1.56	-0.18	-2.18
Centre total	14.80	14.90	6	0.55	14.35	-0.45	-3.06	-0.55	-3.67
Killey									
Coop Gower Rd	4.01	4.04	2	0.18	3.86	-0.16	-3.90	-0.18	-4.52
Coop The Precinct	2.53	2.55	2	0.18	2.37	-0.17	-6.56	-0.18	-7.16
Centre total	6.55	6.59	4	0.36	6.22	-0.32	-4.93	-0.36	-5.54
Sketty									
Sainsburys local, Gower Rd	2.00	2.01	2	0.18	1.83	-0.17	-8.47	-0.18	-9.05
Tesco Express, Gower Road	2.62	2.64	2	0.18	2.46	-0.17	-6.31	-0.18	-6.91
Local shops	2.22	2.24							
Centre total	6.85	6.89	4	0.36	6.53	-0.32	-4.69	-0.36	-5.29
Uplands									
Local shops	0.40	0.40	1	0.09	0.31	-0.09	-22.16	-0.09	-22.66
Sainsbury's Local, Uplands Crescent	1.89	1.90	1	0.09	1.81	-0.08	-4.19	-0.09	-4.80
Tesco Express, Uplands Crescent	2.17	2.18	1	0.09	2.09	-0.08	-3.56	-0.09	-4.18
Centre total	4.46	4.49	3	0.27	4.21	-0.25	-5.50	-0.27	-6.10
Gowerton									
Coop, Sterry Road	3.88	3.91	1	0.09	3.81	-0.07	-1.71	-0.09	-2.34
CK Supermarket, Sterry Road	0.77	0.77							
Centre total	4.65	4.68	1	0.09	4.59	-0.06	-1.32	-0.09	-1.95
Local Centres									
West Cross (Alderwood Road)	0.61	0.62		0.00	0.62	0.00	0.64	0.00	0.00
West Cross (West Cross Lane)	0.25	0.25		0.00	0.25	0.00	0.64	0.00	0.00
Brynmor Road	0.42	0.42		0.00	0.42	0.00	0.64	0.00	0.00
Sketty Park (CKs)	1.93	1.94		0.00	1.94	0.01	0.64	0.00	0.00
Tycoch (Tycoch Cross) (Coop)	0.74	0.74		0.00	0.74	0.00	0.64	0.00	0.00
Penclawd (CK Supermarket)	3.33	3.35		0.00	3.35	0.02	0.64	0.00	0.00
Out of centre									
Coop Brynmill	1.32	1.32		0.00	1.32	0.01	0.64	0.00	0.00
Coop West Cross	4.39	4.41	4	0.36	4.05	-0.34	-7.89	-0.36	-8.27
Coop Bishopston	1.43	1.43		0.00	1.43	0.01	0.64	0.00	0.00
Tesco Express, Bryn Y Mor Road, Gowerton	2.04	2.05		0.00	2.05	0.01	0.64	0.00	0.00
Beyond PCA									
Swansea City Centre									
Coop Plymouth St, Swansea	2.71	2.73	1	0.09	2.63	-0.07	-2.73	-0.09	-3.35
Island, St Davids Square	2.99	3.01	2	0.18	2.83	-0.16	-5.45	-0.18	-6.06
M&S, Oxford St	13.17	13.25	4	0.36	12.89	-0.28	-2.13	-0.36	-2.75
Tesco, Albert Row, Oystermouth Rd	27.34	27.52	33	3.01	24.51	-2.83	-10.37	-3.01	-10.94
Out of centre									
Coop, Meridian Quay, Trawler Rd	1.94	1.95		0.00	1.95	0.01	0.64	0.00	0.00
Sainsbury's, Quay Parade	34.33	34.55	22	2.01	32.54	-1.79	-5.20	-2.01	-5.81
Tesco Express, De La Beche St	2.42	2.43	0.5	0.05	2.39	-0.03	-1.25	-0.05	-1.88
Lidl, Parc Tawe North	7.69	7.74	5	0.46	7.28	-0.41	-5.29	-0.46	-5.89
Inflow			10	0.91					
			100	9.1					

Notes

- [1] taken from table 7
- [2] Allowance made for turnover of existing facilities to gain from pro-rata growth in expenditure to 2026 in line with Table 4.
- [3] & [4] Th estimate - allowing for floorspace efficiency growth to 2026 (table 6)
- [5] = [2] - [4]
- [6] = [5] - [1]
- [7] = [5]/[1]*100
- [8] = [5] - [2]
- [9] = [5]/[2]*100

2018 prices

Table 9b: Comparison trading effects of the proposed development, 2026

	Turnover		Trade Draw to Proposed Development		Residual Turnover 2026	Impact			
	2021	2026	%	£m		Change 2021-26		2026 Impact	
	[1]	[2]	[3]	[4]	£m	[6]	[7]	£m	[9]
Mumbles	3.73	4.23	4	0.1	4.16	0.43	11.61	-0.07	-1.61
Killay	0.53	0.60	2	0.0	0.57	0.04	7.06	-0.03	-5.62
Sketty	0.53	0.60	2	0.0	0.57	0.04	7.06	-0.03	-5.62
Uplands	2.88	3.26	1	0.0	3.24	0.37	12.85	-0.02	-0.52
Gowerton	0.32	0.36	1	0.0	0.35	0.03	8.12	-0.02	-4.68
Swansea City Centre	384.47	436.13	61	1.0	435.09	50.62	13.17	-1.04	-0.24
Florestfach (Pontarddulais FP)	8.73	9.91	5	0.1	9.82	1.09	12.46	-0.08	-0.86
Morfa SP	89.99	102.09		0.0	102.09	12.09	13.44	0.00	0.00
Other retail warehouses	86.05	97.62	14	0.2	97.38	11.32	13.16	-0.24	-0.24
Inflow			10	0.2					
			100	1.7					

Notes

- [1] taken from table 7
- [2] Allowance made for turnover of existing facilities to gain from pro-rata growth in expenditure to 2026 in line with Table 4.
- [3] & [4] WYG estimate - allowing for floorspace efficiency growth to 2026 (table 6)
- [5] = [2] - [4]
- [6] = [5] - [1]
- [7] = [5]/100
- [8] = [5]/2
- [9] = [5]/2*100

Table 9c: Overall Impact, 2026

	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]
Mumbles	14.80	3.73	18.53	14.90	4.23	19.13	14.35	4.16	18.51	-0.02	-3.22
Killay	6.55	0.53	7.08	6.59	0.60	7.19	6.22	0.57	6.79	-0.29	-5.55
Sketty	6.85	0.53	7.38	6.89	0.60	7.50	6.53	0.57	7.10	-0.28	-5.32
Uplands	4.46	2.88	7.33	4.49	3.26	7.75	4.21	3.24	7.46	0.12	-3.75
Gowerton	4.65	0.32	4.97	4.68	0.36	5.04	4.59	0.35	4.94	-0.04	-2.15

Notes

- [1] [2] [3] taken from table 9a/b
- [3] = [1] + [2]
- [4] [5] taken from table 9a/b
- [6] = [4] - [5]
- [7] [8] taken from table 9a/b
- [9] = [7] - [8]
- [10] = [9]/3
- [11] = [9]/3*100

2016 prices

Appendix 3 – Catchment Area Plan