



Prifysgol Cymru
Y Drindod Dewi Sant
University of Wales
Trinity Saint David

Planning & Retail Statement

Aldi Stores Limited & University of Wales
Pontfaen Road, Lampeter



London



Harrogate



Bristol

Contents

Crynodeb Gweithredol	2
Executive Summary	3
1. Introduction	4
2. Site Context	5
3. The Proposed Development	8
4. Planning Policy Context	16
5. The Sequential Approach	24
6. Retail Need and Impact Assessment	28
7. Other Material Considerations	39
8. Summary and Conclusions	47
Appendix 1	
Site Location Plan	
Appendix 2	
Proposed Site Plan	
Appendix 3	
Sequential Assessment	
Appendix 4	
Retail Impact Assessment Tables	

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Crynodeb Gweithredol

Paratowyd y Datganiad hwn ar ran Aldi Stores Limited ('Aldi') a Phrifysgol y Drindod Dewi Sant, i gefnogi cais cynllunio ar gyfer codi siop fwyd adwerthu Aldi Dosbarth A1, adnewyddu Gradd Gradd Pafiliwn chwaraeon rhestredig II, gosod tri pod arddangos pren, ac ardal natur a bioamrywiaeth gyda mynediad cysylltiedig, maes parcio a thirlunio ar Gaeau chwarae Trinity Saint David ar Ffordd Pontfaen yn Llanbedr. Mae'r cais hefyd yn cynnwys Caniatâd Adeilad Rhestredig sy'n gysylltiedig ag adnewyddu'r pafiliwn rhestredig.

Mae Aldi yn bwriadu adeiladu siop ar y safle hwn i wasanaethu poblogaeth Llanbedr a'r ardaloedd gwledig cyfagos. Ar hyn o bryd mae Llanbedr yn cael ei wasanaethu gan archfarchnad Sainsburys yn Market Place, a siop Bwyd y Co-op yn Lower Bridge Street, ond nid oes darpariaeth bwyd disgownt. Mae'r siop Aldi agosaf yn 38 cilomedr i'r de yng Nghaerfyrddin. Felly bydd y cynigion yn gwella'r ddarpariaeth siop fwyd ddisgownt yn yr ardal, ac yn cynorthwyo i gadw gwariant yn yr ardal a fydd yn helpu i leihau'r angen i deithio'n bell, ac felly'n cael buddion cynaliadwyedd.

Bydd yr Aldi arfaethedig yn arwain at fuddion economaidd sylweddol i'r ardal leol, gyda hyd at 40 o swyddi lleol newydd yn cael eu creu, yn ogystal â swyddi adeiladu tymor byr. O ystyried yr ansicrwydd economaidd presennol a'r potensial ar gyfer colli swyddi mawr mewn sawl sector yn dilyn pandemig Covid-19, mae'r buddsoddiad hwn mewn Lampeter o bwysigrwydd sylweddol.

Ddefnyddir y Pentref Bwyd arfaethedig i helpu i hyrwyddo cynnyrch lleol a chynhyrchwyr lleol, a'i ddefnyddio at ddibenion addysgol. Mae hyn yn rhan o fenter ehangach Canolfan Tir Glas.

Bydd adnewyddu'r pafiliwn yn sensitif ac yn ei alluogi i gael ei ddefnyddio eto gan dimau chwaraeon a grwpiau cymunedol. Bydd hyn yn ei dro yn hyrwyddo mwy o ddefnydd o'r cae chwaraeon sy'n weddill ar ochr orllewinol y safle.

Rhoddwyd ystyriaeth ofalus i ddyluniad y siop a chynllun y safle, a gafodd ei lywio gan arfarniad trylwyr o'r safle, ei gyd-destun, a'r holl gyfyngiadau presennol.

O ran yr elfen fanwerthu, cynhaliwyd asesiad dilyniannol, a dangoswyd nad oes unrhyw safleoedd amgen yng nghanol y dref, nac ar ymylon canolfannau sy'n addas ar gyfer y datblygiad a gynigir, ac ni ddylid ystyried yr un ohonynt yn ddilyniannol yn well na safle'r cais. Cynhaliwyd asesiad effaith manwerthu hefyd, sy'n dangos bod yr effeithiau sy'n gysylltiedig â'r cynnig yn y flwyddyn a ragwelir yn isel ac nad ydynt yn fygythiad i fywiogrwydd a hyfywedd y canolfannau presennol. Mae hefyd angen amlwg am siop fwyd yn y lleoliad hwn.

Ategir y cais hefyd gan gyfres o ddogfennau technegol eraill i asesu materion yn ymwneud â threftadaeth, llifogydd, draenio, cynaliadwyedd, tirlunio, ecoleg, coed a halogiad. Daw'r holl ddogfennau hyn i'r casgliad bod y cynnig datblygu buddiol hwn yn gyflawnadwy ac yn cydymffurfio â'r gofynion polisi perthnasol.

Ar sail ystyried y cynigion a nodir yn y Datganiad hwn (a dogfennau ategol eraill), rydym o'r farn bod y cynigion ymgeisio yn cydymffurfio â'r holl bolisiau lleol a chenedlaethol perthnasol, a dylid rhoi caniatâd cynllunio a chaniatâd adeilad rhestredig.

Executive Summary

This Statement has been prepared on behalf of Aldi Stores Limited ('Aldi') and University of Wales Trinity Saint David ('UWTSD') in support of a planning application for the erection of a Class A1 retail Aldi foodstore, the refurbishment of a Grade II listed sports pavilion, the installation of three pre-fabricated wooden exhibition pods, and a nature and biodiversity area with associated access, car parking and landscaping at Trinity Saint David's Playing Fields on Pontfaen Road in Lampeter. The application also includes Listed Building Consent involved with the refurbishment of the listed pavilion.

Aldi intends to construct a store at the site to serve the population of Lampeter and the surrounding rural areas. Lampeter is currently served by a Sainsburys supermarket at Market Place, and a Co-op Food store at Lower Bridge Street, but there is no discount food provision. The nearest Aldi store is a 38 km drive to the south in Carmarthen. The proposals will therefore enhance the discount foodstore provision in the area, and assist in retaining expenditure in the locality which will help reduce the need to travel, therefore having sustainability benefits.

The proposed Aldi will result in considerable economic benefits for the local area, with up to 40 new local jobs being created, in addition to short term construction jobs. Given the current economic uncertainty and potential for major job losses in many sectors following the Covid-19 pandemic, this investment in Lampeter is of significant importance.

The proposed Food Village will be used to help promote local produce and local producers, and used for educational purposes. This is part of the wider Canolfan Tir Glas initiative.

The sensitive refurbishment of the pavilion will enable it to be brought back into use by sport teams and community groups. This in turn will promote increased use of the remaining sports pitch on the western side of the site.

Careful consideration has been given to the design of the store and the site layout, which has been informed by a thorough appraisal of the site, its context, and all existing constraints.

In regard to the retail element, a sequential assessment has been undertaken, and it has been demonstrated that there are no alternative sites within the town centre, or in edge of centre locations that are suitable for the development proposed, and none should be considered sequentially preferable to the application site. A retail impact assessment has also been undertaken, which indicates that impacts associated with the proposal in the forecast year are low and represent no threat to the vitality and viability of the existing centres. There is also a clear need for a foodstore in this location.

The application is also supplemented by a suite of other technical documents to assess matters relating to heritage, flooding, drainage, sustainability, landscaping, ecology, trees, and contamination. All these documents conclude that this beneficial development proposal is deliverable and complies with the relevant policy requirements.

On the basis of the consideration of the proposals set out in this Statement (and other supporting documents), we consider that the application proposals comply with all relevant local and national policies, and planning permission and listed building consent should be granted.

1. Introduction

1.1. This Planning and Retail Statement is submitted by Planning Potential, on behalf of Aldi Stores Limited (Aldi) and University of Wales Trinity Saint David ('UWTSD'), in support of a full Planning and Listed Building Consent application for the erection of a Class A1 retail Aldi foodstore, the refurbishment of a Grade II listed sports pavilion, the installation of three pre-fabricated wooden exhibition pods, and a nature and biodiversity area with associated access, car parking and landscaping at Trinity Saint David's Playing Fields at Pontfaen Road in Lampeter.

1.2. The description of development is:

"The erection of a Class A1 retail Aldi foodstore, the refurbishment of a Grade II listed sports pavilion, the installation of three pre-fabricated wooden exhibition pods, and a nature and biodiversity area with associated access, car parking and landscaping."

1.3. This Statement addresses all of the relevant planning policy considerations associated with the proposed development, but should be read in conjunction with other documents and drawings submitted in support of this application.

Background

1.4. Aldi has been searching for a site in Lampeter to develop a store for several years. The area around Lampeter is not served by an Aldi store, with the closest being located a 38km drive to the south in Carmarthen.

1.5. Discussions commenced with the site owner, University of Wales, in 2020, to explore the potential for developing the site.

1.6. The application site is not currently used to its full potential as a sports facility, and so it is considered that the proposal would have wider benefits to the town and surrounding area, and not prejudice sports related activities.

1.7. Prior to submitting this application proposal, Aldi and the University have held discussions with Council Officers at meetings in October 2020, February 2021, and September 2021. A meeting with Cadw was also held in September 2021. These are referenced later in this statement.

1.8. A formal Pre-Application Consultation (PAC) is now taking place. The results of the consultation will be reported in the PAC Statement, which will accompany the full planning submission and be updated accordingly following the end of the PAC period. This document forms part of the statutory Pre-Application Consultation required for all 'major' schemes in Wales.

Report Structure

1.9. This assessment is set out as follows:

- Section 2 – Summarises the site context
- Section 3 – Details the development proposals;
- Section 4 – Sets out the planning policy context against which the proposal should be assessed, including Planning Policy Wales and the Local Development Plan;
- Section 5 – Undertakes a sequential assessment of potential alternative sites;
- Section 6 – Undertakes a retail need (quantitative and qualitative) and retail impact assessment;
- Section 7 – Assesses the other material considerations relevant for the application; and
- Section 8 – Presents our summary and conclusions.

2. Site Context

The Site

- 2.1. The application site is situated on the western side of Lampeter on Pontfaen Road, and is located approximately 270m to the west of the town centre boundary. The site is, therefore, considered edge-of-centre in retail policy terms. The site measures approximately 2.61 ha and is currently in community use as a sports facility. The area falls in the jurisdiction of the unitary authority of Ceredigion County Council.
- 2.2. The site is located west of the town centre, towards the periphery of Lampeter where the density of built environment becomes more sporadic. North of the site is predominately residential and includes a mixture of terraced and detached houses. To the south-east of the site sits Lampeter leisure centre and a school. The town's outskirts lie west of the site consisting of mainly agricultural fields and homes fronting the main road.
- 2.3. The site is bounded to the north by Pontfaen Road, to the south by fields and Lampeter Leisure Centre, to the west by a small watercourse and row of mature trees, and to the east by a residential care home and three tennis courts.
- 2.4. The application site currently comprises two grass rugby pitches and a Grade II listed pavilion in the southern part of the site. The sports playing fields have been used for rugby, cricket, football, hockey, and other sporting activities by Saints David's College, and now the University of Wales Trinity Saint David. The site has been used as a playing field for a long period of time, although in recent years has not been in active or regular use. There are faint markings which outline a cricket, rugby, and a football pitch.
- 2.5. The field is enclosed on the south and west with a row of mature trees. A number of mature trees also run along the internal front of the wall, species including horse chestnut and oaks. The boundaries are formed by hedgerows on the northern, eastern, and southern boundary. Scattered trees are also present. There are hedgerows and trees of local ecological importance with the grassland, buildings, and hardstanding of negligible ecological importance. A water course also flows alongside the row of trees at the west border and a stone wall runs across the northern boundary of the site.
- 2.6. The main access to the playing field is gained from an iron gated entrance at the far northeast end. This entrance is formed by a pair of iron gates and a pedestrian gate, which are both likely early to mid-20th Century in date.
- 2.7. The only structure on site is a Grade II listed pavilion located on the south side of the field. Built in 1909, the building is protected for its special architectural interest as a well preserved early 20th century sports pavilion, important for its unusual example of this type of building. A modern changing room building sits directly behind the listed structure, although is exempt from the listing.
- 2.8. There is currently no formal vehicular access into the site, although a set of wide gates are found at the north eastern corner of the site, which is also where pedestrians access the site. The site is owned and managed by University of Wales Trinity Saint David (UWTSD).

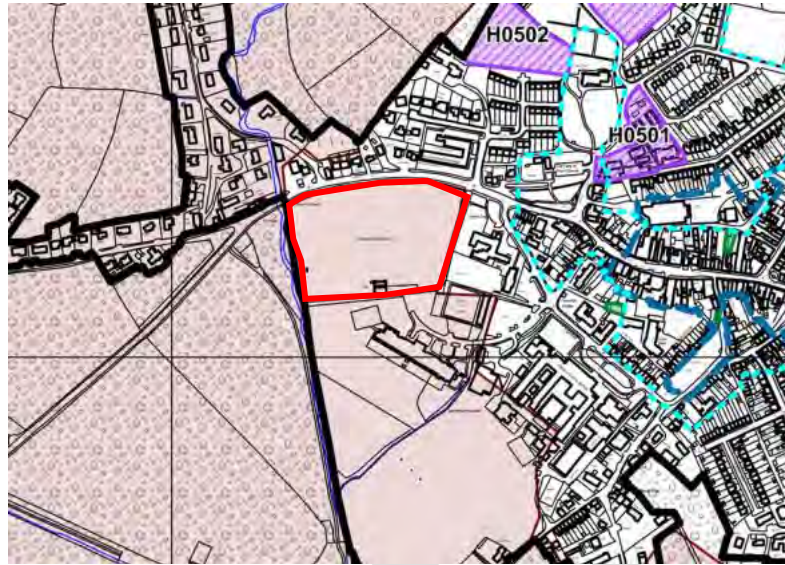


Source: Google Maps – Site outlined in red

Relevant Allocations and Designations

- 2.9. The application site is not allocated for a specific use within the adopted development plan, but it is located within the settlement boundary for Lampeter. The site is located approximately 270m walking distance to the town centre boundary, and is therefore classed as edge-of-centre for retail purposes.
- 2.10. The site is within a Special Landscape Area. Natural Resources Wales states that Special Landscape Areas are a non-statutory designation applied by the local planning authority to define areas of high landscape importance within their administrative boundary. Areas of high landscape importance may be designated for their intrinsic physical, environmental, visual, cultural, and historical value in the contemporary landscape.
- 2.11. There are Tree Preservation Orders on a number of the trees located on the boundaries of the site.
- 2.12. The site is not located within any Conservation Area. However, the western boundary of the Lampeter Conservation Area lies 70 meters to the east of the north-eastern corner of the playing field, beginning at the junction from Temple Terrace onto the Pontfaen Road. The proposed development site is not within any Registered Historic Landscape (RHL), the closest RHL (Dolaucothi HLW (D) 8) lying over 11km to the southeast.
- 2.13. There are also no Registered Parks & Gardens (RPG) within the proposed development area, the closest RPG (Derry Ormond PGW (Dy) 48(CER)) lying some 4km to the northeast.
- 2.14. There are no designated Scheduled Monuments within the proposed development area, the closest scheduled monument being Lampeter Castle Mound (CD110), a Norman motte, positioned within the grounds of the University of Wales Trinity Saint David (UWTSD), approximately 560m east of the proposed development site.
- 2.15. Other than the designated sports pavilion, there are no further listed buildings within the proposed development area (playing field). However, there are a further 27 listed buildings within a 1km radius from the site.
- 2.16. This number includes Saint David's University College (original building built in 1822) which is Grade II* Listed. All other listed buildings have a Grade II Listing and the majority of these, except for one site, are positioned within the Lampeter Conservation Area.
- 2.17. The site is not covered by or adjacent to any statutorily or non-statutorily designated sites, although a number of such sites are present within the potential Zone of Influence of the development. This includes the River Teifi Special Area of Conservation (SAC) which is connected to the site by a watercourse which is located adjacent to the western boundary of the site.
- 2.18. According to Natural Resources Wales's (NRW) online Flood Map for Planning (FMP), the site is located predominately within Flood Zone 1, defined as having less than 1 in 1000 (0.1%) chance of flooding in a given year, including climate change.
- 2.19. Parts of the site are located within Flood Zones 2 and 3, shown to be at relatively high risk of flood from rivers. The area shown to be at risk of flooding from rivers, the western part of the site, is to remain as a grassed sports pitch. However the proposed development areas of the Aldi store, car park and service yard as well as the Food Village are all located within Flood Zone 1.

Figure 1 – Inset Map:0501



Source: Ceredigion LDP (2013) – Site outlined in red

Relevant Planning History

- 2.20. The only planning history relevant to the application site available online is the erection of groundsmen stores which was approved in 1990.

Wider Area

- 2.21. Lampeter is a historic market and university town west of the Cambrian Mountains and within the Teifi Valley, Ceredigion, Wales. The townscape expresses Victorian and Gothic architecture with distinctive buildings of churches, chapels, and public buildings.
- 2.22. The site is located west the centre towards the periphery of Lampeter where the density of built environment becomes more sporadic. North of the site is predominately residential and includes a mixture of terraced and detached houses. To the south-east of the site sits Lampeter leisure centre and a school. The town's outskirts lies west of the site consisting of mainly agricultural fields and homes fronting the main road.

3. The Proposed Development

- 3.1. This Planning and Listed Building Consent application proposes the erection of a Class A1 retail Aldi foodstore, the refurbishment of a Grade II listed sports pavilion, the installation of three pre-fabricated wooden exhibition pods, and a nature and biodiversity area with associated access, car parking and landscaping at Trinity Saint David's playing Fields at Pontfaen Road in Lampeter. The formal description of development is:

"The erection of a Class A1 retail Aldi foodstore, the refurbishment of a Grade II listed sports pavilion, the installation of three pre-fabricated wooden exhibition pods, and a nature and biodiversity area with associated access, car parking and landscaping."

- 3.2. Each proposed element will be described in detail below.

The Aldi Foodstore

- 3.3. An Aldi foodstore (Class A1) is proposed in the eastern part of the application site. The store will measure circa 1,855 sq. m (GIA), and will have a net sales area of 1,315 sq. m. The remainder of the building comprises the 'back of house' warehousing area, staff welfare space and other ancillary space.
- 3.4. Careful consideration has been given to the design, scale, and massing of the proposal, which has been informed by the site's context. The operational requirements of the store were also an important factor informing the final design proposals. The layout of the proposed Aldi site is designed to produce an uncluttered and attractive environment for customers, which retains the existing open nature of the site and promotes safe vehicular and pedestrian movements.
- 3.5. The siting of the Aldi foodstore has been sensibly and sensitively considered to minimise the impact upon the listed pavilion. This is discussed later in this Statement, and within the Heritage Impact Assessment which supports the application.
- 3.6. The proposed building is a single storey contemporary unit with a flat roof and parapet. The store front that faces the site entrance is highlighted by a simple cantilevered canopy, and an external lobby that defines the main entrance and trolley bay area. A series of ribbon windows divided by stonework piers helps to break up the public facing elevation, and allows natural light into the shop floor.
- 3.7. The building sits on a 'smooth black' brickwork plinth and facades are finished with a mixture of white render, vertical timber cladding, and random coursed stonework. The timber and white render compliments the existing appearance of the pavilion, and the stonework appropriately reflects much of the architecture in Lampeter such as the churches and chapels.
- 3.8. The north elevation that faces Pontfaen Road has full height glazing. The glass panels are divided to create a simple yet attractive design and aims to enhance the building's interaction with the public realm. It also functions to provide high levels of daylight in the checkout area.
- 3.9. Finishes to the proposed Aldi foodstore will include the use of vertical timber cladding. This is highlighted on the front and side elevations by sections of natural stonework, responding to the local vernacular and echoing materials used on the Enterprise Centre opposite. White through-coloured render is also proposed to compliment the listed pavilion.
- 3.10. The glazing elements of the building are to be constructed in full height polyester powder coated aluminium curtain walling system, in RAL colour 7016, dark grey. The cantilevered canopy will be finished in polyester powder coated pressed aluminium to create a modern appearance. This will also be finished in RAL colour 7016 to tie in with the glazing and maintain a coordinated building aesthetic.
- 3.11. The site will be accessed from Pontfaen Road, with a combined access point for vehicles, cyclists, and pedestrians. An additional dedicated pedestrian access will be installed approximately 30m to the east of the vehicle access.
- 3.12. The Aldi portion of the proposal will include 118 parking spaces, which includes five disabled spaces, and seven parent and child spaces, and two 'Click and Collect' spaces.
- 3.13. The car park will include provision for 24 electric vehicle charging points (EVCPs). Initially, four 'live' charging points will be installed, with the remaining 20 spaces having 'passive' provision. Those spaces with passive provision will have the below ground infrastructure already installed so can be upgraded easily when demand requires it.
- 3.14. Four cycle hoops will be located outside the shopfront for secure bicycle parking for eight cycles.

- 3.15. All proposed external refrigeration equipment is to be located to the rear of the store to the south elevation within an appropriate plant enclosure. The loading bay will be on the south eastern side of the building to the rear of the store, and will contain the loading bay where delivery vehicles are unloaded. The entire service yard will be enclosed by an acoustic fence.
- 3.16. A feature stone wall is proposed to the north-east end of the welfare block facing Pontfaen Road, helping to connect the building within the context of Lampeter.
- 3.17. The design of the store and wider site is justified in detail within the Design and Access Statement, produced by Kendall Kingscott.
- 3.18. The following table summarises the features of the Aldi application proposal.

Table 1: Aldi Scheme Summary

	Aldi Proposal
Gross Internal Area (sq m)	1,855 (GIA)
Retail Sales Area (sq m)	1,315
Disabled Parking Spaces	5
Standard Parking Spaces	100
Parent & Child Parking Spaces	7
Click & Collect spaces	2
EVCP Spaces (Active)	4
EVCP Spaces (Passive)	20
Total Car Parking	118
Bicycle Stands	4 (8 spaces)

The Food Village

- 3.19. Event and exhibition pods are proposed in the form of three pre-fabricated wooden structures. This element will be known as a 'Food Village' and its purpose is to showcase local produce, and to assist with food-based research and associated academic activities. The pods will predominantly be used for education and exhibiting various programmes/activities, but they will occasionally be used for small scale retailing.
- 3.20. There will be three pods installed initially with space for additional pods in the future. Up to 25 parking spaces will be made available for the Food Village.
- 3.21. The pods will have an internal floorspace of circa 23 sq. m and will be single storey. The form of the prefabricated pods have taken inspiration from the protecting gables of the pavilion. The pods will also be finished in vertical timber cladding and sheltered with a standing seam roof, to create a clean and contemporary design aesthetic.
- 3.22. The simple and contemporary pods aim to provide attractive and functional spaces whilst not having a negative impact on the setting of the listed building. Due to the relatively open nature of the site, the use of curved or organic structures was avoided as it was considered this type of architecture is more suited to a wooded or enclosed location.
- 3.23. The pods are clad in timber and standing seam cladding, with door window frames finished with dark grey aluminium. Materials to compliment the foodstore and tie in with the recently completed Enterprise Centre opposite the site. At 3.5m high, they are an appropriate scale for the site and allow flexible space for various events and exhibitions. The pods will be supplied with electricity, water and will be IT enabled.
- 3.24. Further details can be found on Drawing Refs. 190866-1355-P2 and 190866-1356-P2.

Refurbishment of Pavilion

- 3.25. The existing listed sports pavilion will be extensively refurbished to create new changing facilities for sports uses, in addition to for community uses. The internal layout of the building will remain largely unchanged, except for the relocation of the WC and kitchen facilities which will be modernised along with the refurbishment of the internal fabric. The works planned to the pavilion include:
- External cleaning, painting and repairs where necessary
 - Reconfiguration of internal walls
 - Creation of new indoor community space/refreshments area
 - Block up an existing opening in the interior
 - Existing staircase replaced like for like in the lobby area
 - Existing door removed in the lobby area and the opening widened for disabled access.
 - Existing washroom walls and door to be removed within kitchen
 - Existing WC walls and door removed within kitchen area
 - New bar/kitchen units and work top
 - Installation of accessible toilet
- 3.26. In order to facilitate the changes to the pavilion, the existing opening will be blocked up, the existing staircase will be replaced like for like, and the existing door removed and opening widened for disabled access. Furthermore, the existing washroom walls and door will be removed, and existing WC walls and door will be removed. A new bar/kitchen units and work top are proposed.
- 3.27. 22 parking spaces are proposed to serve the pavilion. 12 are proposed on the existing area of hardstanding adjacent to the pavilion, with an additional ten proposed off the access leading to the pavilion, directly to the north east of the pavilion.

Other Elements

- 3.28. A nature and biodiversity area is proposed as a sustainable way to deal with surface water drainage on site.
- 3.29. Soft landscaping within the site is designed to create an attractive and appropriate setting for the Aldi store, providing year-round interest and colour, and introduce a strong soft landscape framework with planting throughout the site including trees, selected to maximise biodiversity and aesthetic value.
- 3.30. 26 new trees are proposed. The selection of native species and trees of upright form will minimise future requirements for pruning. The planting size, pattern and spacing of new trees will give a stronger visual effect and will result in well-formed specimens within the urban context, without detriment to pedestrian and vehicle safety.
- 3.31. A native hedge is proposed to the eastern boundary which will provide some softening to the built environment and habitat for wildlife. The species selection for the native hedgerow will include *Acer Campestre*, *Crataegus monogyna*, *Corylus avellana* and *Ilex aquifolium*.
- 3.32. A grass meadow mixture (Emorsgate EP1) is proposed for its ecological value in the rain garden areas and grass areas to the rear of the store.
- 3.33. The ground around the proposed planting will be bark mulched to conserve moisture and reduce weed growth. Soil additives are to be incorporated into the topsoil to all newly planting areas to provide a suitable growing medium. Proposed trees with root balls are to be planted with double stakes and ties to provide anchorage.
- 3.34. SuDS features will also be incorporated into the site to assist with site drainage and are referred to within the Flood Consequences Assessment and Drainage Strategy documents, submitted with this application. Surface water drainage for the proposed Aldi site will be developed and approved under application separate to the planning process.

- 3.35. A new site entrance on the northern boundary will provide vehicular access to all uses on the site. A small number of trees and section of the existing stone wall will be removed to create this access and open up views into the site. A central access will provide routes to the different parking areas.
- 3.36. Regarding access to the site, the existing access (iron gates) to the playing field will be retained but converted to a shared pedestrian footpath and cycle way (no vehicular access), and a new shared access point to serve the foodstore, the multi-purpose pavilion and sports pitch, recreation space and Food Village, will need to be inserted through the northern boundary wall. A further new pedestrian access will also be made in south-east corner of the playing field linking to the Lampeter Leisure Centre and Bowls Club (no vehicular access).
- 3.37. The position of the site entrance enables clear visibility to the Aldi store entrance as well as the pavilion, food village and sports pitch. Pedestrian crossings also provide safe routes in and around the site. Proposed SUDS features are integrated with the parking layout for sustainable site drainage and to also create an attractive soft landscape to break up the area of hard surface.
- 3.38. The existing entrance in the north-east corner will be maintained for pedestrian and cycle access only. Access to the rear of the Aldi store will be closed to the public.
- 3.39. It is proposed that the development will include additional improvements to transport infrastructure. The following items are identified:
 - A new controlled pedestrian crossing on Pontfaen Road to improve foot access to the development.
 - The proposed layout of the site would improve footpath connections, including to the existing access in the south-east corner of the site to the leisure centre. This would provide a contiguous link to existing footways and further improve the public realm in the town for trips on foot.

Aldi Stores Limited

Who is Aldi?

- 3.40. Aldi is Britain's fifth largest supermarket with over 900 stores and around 38,000 employees.
- 3.41. Aldi is attracting hundreds of thousands of new customers every year with its range of exclusive brands, passing low operating costs on to customers in the form of low prices.
- 3.42. The supermarket believes in making every day amazing and that is why every single day Aldi delivers on the best possible value for millions of families throughout the UK and Ireland across everything from award-winning fresh produce to world class gin.
- 3.43. Aldi won't be beaten on price; consistently racks up award after award for quality; treats its suppliers with fairness and respect and recognises the responsibility of supporting valued institutions such as Team GB to demonstrate the importance of health and wellness.
- 3.44. Aldi makes the everyday amazing. But amazing does not happen overnight so that's why Aldi is making changes to be better every single day, to be Fairer, Greener and Healthier for customers, society, and the environment.
- 3.45. The company's current achievements and initiatives include:
 - Aldi has recently been named as the UK's best supermarket by consumer champion, Which? based on a survey of more than 3,000 shoppers across the UK. Aldi was the only supermarket to score five stars for value.
 - Research released by Which? in May showed that Aldi was the cheapest supermarket for a basket of 20 essential items throughout April. Sainsbury's was 14% more expensive than the same shop at Aldi and the same shop was also 15% more expensive at Tesco. The same shop at the Big Four was 13% more expensive.
 - According to The Grocer magazine, Aldi is the UK's lowest priced supermarket. A basket of 33 everyday items at the Big 4 supermarkets is on average 21% more expensive than at Aldi (22/05/21).
 - Aldi has a ten-year partnership with Teenage Cancer Trust – Aldi recently achieved its fundraising milestone of £6m ahead of its five-year target, which will go towards helping the trust to reach out to every young person with cancer in the UK. Aldi has also now committed to extending the TCT partnership for a further five years with a commitment to donate an additional £5m over this period.

- Aldi's rates of pay are significantly higher than the Government's National Living Wage and also above the Living Wage Foundation's recommended national rates. Store Assistants receive a minimum hourly rate of £9.55 nationally and £11.07 in London.
- Aldi is the official supermarket partner of Team GB and ensures every member of the team has access to fresh healthy Aldi food via monthly shopping vouchers, and that 1.8 million 5-14-year-olds will learn about the benefits of cooking fresh, healthy food via its Get Set to Eat Fresh education initiative. Aldi has been a partner since 2015 and has extended its commitment to 2025, including the 2022 Winter Olympic games in Beijing and 2024 Summer Olympic games in Paris.
- Aldi has recently announced plans to increase the amount of food and drink it buys from British suppliers over the next five years by £3.5bn a year as it continues its rapid expansion across the UK.
- Aldi has pledged to donate 10 million meals to families in need in 2021, to help combat hunger's devastating effects, making it their mission to fight against child food poverty as no child should ever go hungry.
- Aldi was ranked the best-performing supermarket for compliance with the Groceries Supply Code of Practice for seven consecutive years, underlining its commitment to maintaining fair, predictable, and sustainable prices within its supply chain.

3.46. Full details of Aldi's awards and achievements are detailed at www.aldi.co.uk/awards.

How Aldi is Different?

3.47. Aldi has a very different approach to food retailing than other food retailers based on simplicity and maximum efficiency at every stage of the business, from supplier to customer. This enables Aldi to sell high quality products, from a limited core range (compared to other supermarkets) of mainly exclusive own labels, at the lowest possible price consistently across the entire range. Aldi is a 'deep discount' retailer.

3.48. The main points of the trading philosophy include:

- Maximum operational efficiency and cost control;
- Standard merchandising through the stores;
- Bulk displays in original shipping cases;
- Efficient operation from supplier to customer;
- Unique delivery system;
- Efficient checkout system;
- Carefully selected and limited core range of 1,500 products;
- Own label high quality products;
- Formidable buying power;
- High volume and turnover per product;
- Heavily discounted prices providing an average 20-30% saving across the entire range, compared with similar quality products.

3.49. The consequence of providing this value retailing concept and service, of high-quality food at heavily discounted prices, is that the design of the store and the sales area are uniform, in order to accommodate bulk food displays and provide the operational efficiency that a discount foodstore requires. These efficiencies are found across the entire operation from supplier to retail store and result in an enviable cost structure which allows Aldi to sell quality food at low prices and operate on much smaller margins than other foodstores.

3.50. As stated, Aldi stores offer a carefully selected and limited core range of good quality exclusive own labels at heavily discounted prices. Predominantly, the limited range of goods relates to a reduced range of variations on the same product line compared to most other supermarkets. These are the most popular items: the ones most used and needed in every household.

- 3.51. By limiting the core range, Aldi suppliers typically only need to produce one package size instead of multiple packages within the same category. With the higher volume of one item, Aldi achieve greater purchasing power. The limited core range further allows Aldi to apply its own label to most of its products (c.90%) which do not include costs that the national brands pass on through higher prices. This allows Aldi to gain a significant cost advantage over competitors without compromising quality.
- 3.52. The deliberate intention is to restrict the range of core goods to approximately 1,500 products in the interests of the consumer and operational efficiencies and pass these savings onto the customer. The restricted core range ensures a high volume and turnover of each individual item, resulting in a favourable cash flow with products effectively sold through the checkouts before they have been purchased centrally.
- 3.53. This is unlike the larger supermarkets which stock in the region of 20,000 - 40,000 product lines, and more modest sized operators, with floor areas of 1,000 – 1,500 sq. m selling 2,500 – 4,000 products. Aldi do not sell cigarettes and tobacco products, stationary products, and pharmaceutical products. The Aldi trading philosophy does not include a specialist butcher, fishmonger, in-store bakery, delicatessen, or hot food counter, which are commonplace in larger supermarkets. Aldi stores also do not accommodate in store cafes / restaurants or franchises such as photo processing, dry cleaning, or opticians.
- 3.54. Whilst the core range of products is limited, Aldi offers a significant choice of locally sourced produce. Where possible Aldi's fresh meat and produce is UK sourced. Fresh fruit and vegetables are also sourced in the UK when in season and Aldi leads the way in supporting British farmers. In addition, Aldi works with a range of local businesses and suppliers, in order to supply fresh bread, milk and other dairy products.
- 3.55. Aldi's stores dedicate approximately 20% of their floorspace to comparison goods. These goods are sold as 'special purchases' on a 'when it's gone, it's gone' basis. This approach is highly seasonal and there is a continued variation in the type of goods that may be on offer. This is a key difference for Aldi when compared to larger supermarkets that typically have 30-40% of their floor area for comparison goods, the majority of which is occupied by permanent product ranges.
- 3.56. How Aldi differs is demonstrated clearly by the trading philosophy. Aldi complement, rather than compete with, existing local traders, independent retailers, and other supermarkets, as well as service providers, as Aldi customers use other facilities to fulfil their grocery and local service needs. This generates a propensity for linked trips and associated spin-off trade which brings qualitative benefits.

Sustainable Development

- 3.57. Aldi supports sustainable development and has a strong track record in delivering schemes which contribute to the needs of the local economy.
- 3.58. The wider Aldi business has a series of sustainability measures and initiatives to ensure its carbon footprint is as low as possible. Some of these measures include:
- Aldi has been carbon neutral since 2019
 - Aldi purchases 100% renewable electricity
 - By 2025, Aldi is aiming to have halved its plastic footprint
 - 92% of packaging is currently recyclable. This will be 100% by 2022.
 - Aldi is aiming to halve food waste by 2030, and currently works with Neighbourly to donate surplus fruit, vegetables and other produce to local community groups.

Catchment

- 3.59. As Aldi stores are of modest scale and fulfil a neighbourhood shopping role, it means more than one store can be accommodated in a Local Authority area. The catchment for a new store is localised and often shoppers to a new Aldi store are existing Aldi customers who have been travelling to their nearest store, but with a new store opening close by, this can reduce the need to travel.
- 3.60. Aldi's local presence can assist in clawing back expenditure being spent elsewhere by providing a food store where perhaps such a facility was not available. This is most important in locations where shops and services are limited and access to stores elsewhere is difficult. A new store helps to retain expenditure within a given catchment area, to the benefit of the community.

Store Operation and Design

- 3.61. The uniform internal layout of an Aldi store reflects the company philosophy of offering value for money through cost effective management and efficiency. The shop fittings are specifically designed and constructed to display the goods as received in their packing cases so there isn't a double handling of goods from packing cases to the shelves. It means new stock can be moved from the warehouse area to the shop floor quickly and in large quantities.
- 3.62. The operation of the store is designed to be efficient and practical for use by customers; ensuring the store offers inclusive accessibility to all. The efficient layout with typically only 4 or 5 aisles means customers can move through the store quickly. There is ease of access to goods with all shelving being within easy reach. As the range of goods is limited customers can find what they are looking for quickly. With goods being pre-packaged, such as fruit and vegetables, customer can identify goods quickly and shop efficiently. Importantly, there are long conveyors at the check-out that hold a customer's full shop to allow goods to be unloaded for scanning and payment quickly. Goods are re-loaded back into the trolley at the check-out and packing is undertaken at the customer's leisure beyond the check-out area.
- 3.63. Aldi recognises that design is a key consideration in the determination of applications for its stores. The external design has evolved over time and now the design for each store is consistent across Aldi's portfolio, promoting modern, smart buildings with clean lines and glazed frontages which meet customer expectations.

Accessibility

- 3.64. The local nature of many of Aldi's stores encourages high levels of pedestrian shoppers and users of public transport. At new stores, cycle stands are provided, close to the store entrance for natural surveillance and mostly under the store canopy, to encourage cycling as a mode of transport.
- 3.65. Aldi requires new stores to have car parking adjacent to cater for customers who choose this mode of transport. Most car trips to new Aldi stores are not new to the network but rather transferred or linked trips. Full details are provided in the Transport Assessment.

Residential Amenity

- 3.66. The opening hours of Aldi stores are more limited than some other larger supermarkets which operate 24-hour. Currently Aldi stores operate 08:00 to 22:00 Monday to Saturday and for six hours between 10:00 to 18:00 on Sundays, to comply with Sunday Trading Laws.
- 3.67. As Aldi stores are located in residential areas, Aldi is committed to being a responsible neighbour and seeks to ensure the amenity of residents is maintained.

Job Creation and Training

- 3.68. New Aldi stores generally employ between 30 - 50 staff. It is Aldi's preference to recruit staff locally. The company's remuneration and training policy reflects Aldi's firm belief that a well-trained and highly motivated workforce is essential to the success of the business.
- 3.69. All hourly paid wages for store employees exceed the Government's National Living Wage and the Living Wage Foundation's recommended national rate. Aldi offers full training for all its positions and the schedule and facets of the training are tailored to the individual.
- 3.70. Aldi has two of the most successful apprentice schemes and graduate programmes in the UK. Apprentices are trained to work in all parts of the business including at store, distribution, logistics and management level, as well as progression through to the Store Management Team.
- 3.71. Aldi's on-going graduate scheme secures an annual intake for the Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK-wide programme.
- 3.72. The construction of a new store requires the services of local building trade contractors which provides employment opportunities during the build out period. Usually, a range of skills such as ground works, steel, brick and block work and shop fitting are sourced locally, as well as cleaners and labourers.

Canolfan Tir Glas

- 3.73. The University recognises the importance of engaging itself with the local community and, with that in mind, the intention is to locate the proposed Centre in three specific places in the town. The Centre's headquarters will be established on the University campus, while it will also have a prominent presence in the town centre in the form of an innovative training centre with a food village to celebrate and showcase local produce at the application site (i.e. the Food Village). These will all be interconnected providing a unique opportunity for the town and the University to work together strategically for the benefit and prosperity of the local economy for years to come.
- 3.74. Having participated in a number of public events in recent years to consider the future direction of Lampeter, the University is convinced that it has a real opportunity – in partnership with others – to develop an entity that focuses on the relationship between itself and the surrounding natural and rich environment.
- 3.75. With that in mind, the University intends to establish Canolfan Tir Glas on its campus in Lampeter during 2021.
- 3.76. This centre – which will promote the local food industry, local sustainability, resilience, and enterprise within a rural context – will focus on strengthening the economic infrastructure of Lampeter and its hinterland, providing the town and area with a clear focus in terms of identity and brand.
- 3.77. A core part of the scheme is to work closely with Aldi to develop the concept of a Food Village on part of the application site. As a net carbon zero company, and with a clear ambition to cut single use plastic and source as much produce locally within Wales, Aldi's business practices align with the principles underpinning the University's aims for Canolfan Tir Glas.
- 3.78. With the sale of the land to Aldi, the University would also be in a position to invest significantly in a new food and hospitality training centre in the centre of Lampeter and a rural enterprise centre on its campus. The scheme is underpinned by economic regeneration, with the aim of creating new jobs, attracting many more visitors to the town, and increasing the number of further and higher education students studying in Lampeter.
- 3.79. The University sees the establishment of Canolfan Tir Glas as a significant development and a clear indication of its long-term commitment to the Lampeter Campus.
- 3.80. Indeed, it can envisage this development leading in time to the establishment of the campus as a leading centre for sustainable education within the United Kingdom. That would be a fitting and appropriate way of celebrating the University's bicentenary in 2022.
- 3.81. Event and exhibition pods linked with the food and nutrition industry are proposed to showcase Welsh produce to coincide with associated academic activities. Titled 'Lampeter Food Village', the site aims to support the branding and identity of Lampeter as a market town with a particular focus on food and its various products.

4. Planning Policy Context

- 4.1. The following section provides a summary of the relevant national and local planning policy relevant to the proposed development of an Aldi foodstore at the application site.

Relevant National Policy

Future Wales: The National Plan 2040

- 4.2. The Future Wales: The National Plan 2040 is a national development framework, setting the direction for development in Wales to 2040. It is a development plan with a strategy for addressing key national priorities through the planning system, including sustaining, and developing a vibrant economy, achieving decarbonisation and climate-resilience, developing strong ecosystems, and improving the health and well-being of Wales' communities.

Well-being of Future Generations (Wales) Act 2015

- 4.3. The Well-being of Future Generations (Wales) Act 2015 ('the Act') gives a legally-binding common purpose – the seven well-being goals – for national government, local government, local health boards and other specified public bodies. It details the ways in which these bodies must work, and work together, to improve the well-being of Wales. It is through the Act that Wales will make its contribution to the achievement of the 17 United Nations Sustainable Development Goals

Planning Policy Wales, Edition 11 (2021)

- 4.4. Planning Policy Wales (PPW), Edition 11, was published in February 2021 and sets out the land use planning policies of the Welsh Government. The PPW translates the Government's commitment to sustainable development into the planning system so that it can play an appropriate role in moving toward sustainability. The PPW is supplemented by a series of Technical Advice Notes (TANs) which will be discussed in more detail below.

Retail Tests

- 4.5. National policy applying to proposals involving retail development is set out at Chapter 4.3 (Retail and Commercial Development) of the PPW. Paragraph 4.3.3 states that the Welsh Government's objectives for retail and commercial centres are to:
- Promote viable urban and rural retail and commercial centres as the most sustainable locations to live, work, shop, socialise and conduct business;
 - Sustain and enhance retail and commercial centres' vibrancy, viability, and attractiveness; and
 - Improve access to, and within, retail and commercial centres by all modes of transport, especially walking, cycling and public transport.
- 4.6. Paragraph 4.3.14 states that in deciding whether to identify sites for comparison, convenience or other forms of retail uses in development plans or when determining planning applications for such uses, planning authorities should first consider whether there is a need for additional retail provision. However, there is no requirement to demonstrate the need for developments within defined retail and commercial centre boundaries or sites allocated in a development plan for specific retail uses.
- 4.7. Paragraph 4.3.18 states that the Welsh Government operates a 'town centres first' policy in relation to the location of new retail and commercial centre development. The same paragraph states that 'in implementing this policy, planning authorities should adopt a sequential approach to the selection of new sites in their development plan and when determining planning applications for retail and other complementary uses'. By adopting a sequential approach, first preference should be to locate new development within a retail and commercial centre defined in the development plan hierarchy of centres.
- 4.8. Paragraph 4.3.26 states 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.

Good Design Making Better Places

- 4.9. PPW 11 states that good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and

between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surrounding area.

- 4.10. Paragraph 3.4 states that design is an inclusive process, which can raise public aspirations, reinforce civic pride and create a sense of place and help shape its future.

Access and Inclusivity

- 4.11. Paragraph 3.5 states that good design is inclusive design. Development proposals should place people at the heart of the design process, and acknowledge diversity and difference.
- 4.12. Paragraph 3.6 states that development proposals must address the issues of inclusivity and accessibility for all. Design measures and features should enable easy access to services by walking, cycling and public transport.

Environmental Sustainability

- 4.13. Paragraph 3.7 states that good design promotes environmental sustainability and contributes to the achievement of the well-being goals.
- 4.14. Paragraph 3.8 states that good design can help to ensure high environmental quality.

Character

- 4.15. Paragraph 3.9 the layout, form, scale and visual appearance of a proposed development and its relationship to its surroundings are important planning considerations.
- 4.16. Paragraph 3.10 In areas recognised for their particular landscape, townscape, cultural or historic character and value it can be appropriate to seek to promote or reinforce local distinctiveness.

Community Safety

- 4.17. Paragraph 3.11 Local authorities are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions.

Movement

- 4.18. Paragraph 3.12 states that good design is about avoiding the creation of car-based developments. It contributes to minimising the need to travel and reliance on the car, whilst maximising opportunities for people to make sustainable and healthy travel choices for their daily journeys.
- 4.19. Paragraph 3.13 states that existing infrastructure must be utilised and maximised, wherever possible.

Design and Access Statements

- 4.20. Paragraph 3.17 states that a Design and Access Statement communicates what development is proposed, demonstrates the design process that has been undertaken and explains how the objectives of good design and placemaking have been considered from the outset of the development process. In preparing design and access statements, applicants should take an integrated and inclusive approach to sustainable design, proportionate to the scale and type of development proposal.
- 4.21. Paragraph 4.1.17 states that Design and Access Statements should show how the design of the scheme has responded to the sustainable transport hierarchy.
- 4.22. Paragraph 4.1.24 states that Design and Access Statements should demonstrate how the design of new or enhanced streets has responded to urban design principles, including the guidance in Manual for Streets and the Active Travel Design Guidance.
- 4.23. Paragraph 4.1.49 states that Design and Access Statements should demonstrate how the design and layout of the development will reduce the level and speed of traffic to appropriate levels, and responds to the guidance in Manual for Streets and the Active Travel Design Guidance.

Public Transport

- 4.24. Paragraph 4.1.35 states that the availability of public transport is an important part of ensuring a place is sustainable. It enables people to undertake medium and long journeys without being dependent on having access to a car.

Accessibility

- 4.25. Paragraph 3.45 states that Spatial strategies should support the objectives of minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport.
- 4.26. Paragraph 3.48 states that sites which are unlikely to be well served by walking, cycling and public transport should not be allocated for development.

Economic Development/Regeneration

- 4.27. 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. The planning system should ensure that the growth of output and employment in Wales as a whole is not constrained by a shortage of land for economic uses.
- 4.28. Paragraph 5.4.2 states 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.
- 4.29. Paragraph 5.4.2 also states that the Welsh Government seeks to maximise opportunities to strengthen the foundational economy, particularly the food, retail, tourism, and care sectors which play such a prominent role throughout Wales; the planning system should be supportive of this aim.
- 4.30. Paragraph 5.9.25 states that the social, environmental, and economic (including job creation) benefits associated with any development should be fully factored in, and given weight in the decision making process.

Welsh Language and Placemaking

- 4.31. Paragraph 5.4.1 states that the Welsh language is part of the social and cultural fabric and its future well-being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its , use and the Thriving Welsh Language well-being goal.

Community Facilities

- 4.32. Paragraph 3.25 states that community facilities perform various functions which cover a broad range of activities and services that can be delivered by the public, private and third sectors. Community facilities contribute to a sense of place which is important to the health, well-being and amenity of local communities and their existence is often a key element in creating viable and sustainable places. They can include schools, cultural facilities, health services, libraries, allotments, and places of worship.

Recreational Spaces

- 4.33. Paragraph 4.5.1 states Recreational spaces are vital for our health, well-being, amenity and can contribute to an area's green infrastructure. They provide a place for play, sport, healthy physical activity and a place to relax often in the presence of nature, and they contribute to our quality of life. Networks of high quality, accessible green spaces and recreation spaces will also promote nature conservation, biodiversity and provide enjoyable opportunities for residents and visitors to participate in a wide range of physical activities. These activities are important for the well-being of children and adults and for the social, environmental, cultural and economic life of Wales.

The Historic Environment

- 4.34. Paragraph 6.1.5 states that the planning system must take into account the Welsh Government's objectives to protect, conserve, promote and enhance the historic environment as a resource for the general well-being of present and future generations. The historic environment is a finite, non-renewable and shared resource, and a vital and integral part of the historical and cultural identity of Wales.

Planning Policy Wales: Technical Advice Notes (TANs)

Technical Advice Note (TAN) 4: Retail and Commercial Development (2016)

- 4.35. TAN 4 (2016) specifically relates to retail and commercial development.
- 4.36. Objective 1 of TAN 4 reflects the 'town centre first' approach of the PPW and states that viable urban and rural retail and commercial centres need to be promoted as the most sustainable locations to live, work, shop, socialise and conduct business.
- 4.37. Part 6 sets out the test of retail need. The retail needs tests are of a quantitative and qualitative nature, and are required to be undertaken for any application in an edge-of-centre or out-of-centre location which is not in accordance with an adopted development plan. It also notes that this is the starting point for planning new retail development in both development plans and development management.
- 4.38. Paragraph 6.3 clarifies that there is no particular methodology prescribed by the Welsh Government, instead developers and LPAs are encouraged to prepare assessments in a clear logical and transparent way, with robust and realistic evidence.
- 4.39. Paragraph 6.5 confirms that quantitative retail need should be established, before other, qualitative aspects of need are considered. Paragraph 6.6 states that the latter is harder to justify and will be subject to close scrutiny. It notes that the overall aim of assessing qualitative need is to achieve an appropriate distribution and range of sites for stores to meet the need of all communities, particularly where provision is inadequate.
- 4.40. Part 7 identifies the sequential test approach which requires that only when retail and commercial centres and edge of centre locations have been considered and found to be unsuitable can out-of-centre options within, and then outside, a settlement area be considered.
- 4.41. Paragraph 7.4 provides guidance on the application of the test, noting that edge-of-centre proposals should not normally be located more than 200 to 300 metres from the edge of the centre.
- 4.42. The same paragraph also states that the size of the retail and commercial centre, local topography, and presence of physical barriers to access may influence any assessment. For example, it may limit the area that can be considered edge-of-centre for a smaller or more constrained centre.
- 4.43. Finally, paragraph 7.5 states that 'developers and retailers should be flexible and innovative about the format, design and scale of proposed development and the amount of car parking needed, tailoring these to fit local circumstances.'
- 4.44. Paragraph 8.2 outlines the requirements for retail impact assessments. Retail applications of 2,500 sq. metres or more gross floorspace that are proposed on the edge of, or outside retail and commercial centres should be supported by a retail impact assessment provided by the developer. It notes that smaller retail planning applications or site allocations may also be assessed where local planning authorities believe it will have a significant impact on a retail and commercial centre.

Technical Advice Note (TAN) 10: Tree Preservation Orders

- 4.45. TAN 10 sets out guidance for local planning authorities on tree preservation when granting planning permission.

Technical Advice Note (TAN) 15: Development, Flooding and Coastal Erosion

- 4.46. This new guidance on planning for flooding and coastal erosion from 1 December 2021. This TAN provides technical guidance which supplements the policies set out in PPW in relation to flooding and coastal erosion. It provides a framework within which the flood risks arising from rivers, the sea and surface water, and the risk of coastal erosion can be assessed. It also provides advice on the consequences of the risks and adapting to and living with flood risk.

Technical Advice Note (TAN) 16: Sport, Recreation, and Open Space

- 4.47. This TAN provides technical guidance to supplement policy set out in PPW. It advises on the role of the planning system in making provision for sport and recreational facilities and informal open spaces, as well as protecting existing facilities and open spaces in urban and rural areas in Wales.

Technical Advice Note (TAN) 18: Transport (2007)

- 4.48. TAN18 (Transport) states that Planning applications for development schemes for food retail over 1,000 sq. m. (GFA) will need to be supported by a Transport Assessment (TA). The TA will provide the basis for assessing all the potential travel impacts of developments including their effect on the highway network and the likely modal split of the trips that would be generated. This assessment will help

establish the gaps in existing transport provision and the measures necessary to make a development accessible by sustainable modes.

Technical Advice Note (TAN) 20: Planning and the Welsh Language (2017)

- 4.49. The purpose of this TAN is to provide guidance on how the Welsh language may be given appropriate consideration in the planning system and on compliance with the requirements of planning and other relevant legislation.

Technical Advice Note (TAN) 24: The Historic Environment (2017)

- 4.50. This guideline establishes the principles and framework within which archaeological matters are a material consideration within the planning process. It identifies how sites are preserved and recorded, and the role of local authorities and the Welsh Office working through Cadw. Technical Advice Note 24 replaces Welsh Officer Circulars 60/96 and 61/96. The purpose of this TAN is to provide guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning and Listed Building (LBC) applications.
- 4.51. Technical Advice Note 24 emphasizes that listed buildings are nationally important assets which represent a unique source of information about the past and make a valuable contribution to the quality and character of Welsh landscapes and townscapes. Buildings are listed when they are considered to be of special architectural or historic interest.

The Active Travel (Wales) Act (2013)

- 4.52. The Active Travel (Wales) Act 2013 provides the primary legal foundation on which active travel in Wales will be supported. It is supplemented by subordinate legislation, which includes the Direction on the designated localities to which certain provisions in the Act apply and Directions to Local Authorities specifying or modifying how and when certain duties have to be met. We will seek to learn from the first iteration of the process of producing both sets of maps by local authorities. We will keep the list of designated localities under review and where necessary make amendments. We will also revise the Delivery Guidance accompanying the Act, where required.

Ancient Monuments and Archaeological Areas Act 1979

- 4.53. Under the Ancient Monuments and Archaeological Areas Act 1979 (1979 Act), the Welsh Assembly Government and Cadw are required to compile and maintain a Schedule of monuments considered to be of national importance. The statutory consent of Cadw is required before any works are carried out which would have the effect of demolishing, destroying, damaging, removing, repairing, altering, adding to, flooding or covering up a Scheduled Monument (SM). In addition, impacts of development works upon the setting of an SM form an important consideration in the granting or refusal of planning consent to conduct development works

Planning (Listed Building and Conservation Areas) Act 1990

- 4.54. Under the Welsh Office Circular 61/96, 'Planning and the Historic Environment: Historic Buildings and Conservation Areas' and the 'Planning (Listed Buildings and Conservation Areas) Act 1990 and the Historic Buildings and ancient Monuments Act of 1953 (Ref.1), listed buildings are categorised as Grades I and II in decreasing order of special architectural and historic importance. These buildings are of acknowledged importance to the nation's built heritage. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning decision makers to have special regard to the desirability of preserving listed buildings, their settings or any features of special historical interest.

Relevant Local Policies

Ceredigion Local Development Plan 2007-2022 (LDP) - Volume 1 Strategy and Policies (2013)

- 4.55. On the 25th April 2013 the Council resolved to formally adopt the 'Ceredigion Local Development Plan' (LDP). This means that the LDP is now operational and supersedes previous development plans approved or adopted by Ceredigion County Council or its predecessor authorities.
- 4.56. Policy S01: Sustainable Growth states that growth will be focused to deliver stronger, more sustainable communities and this will be achieved by providing opportunity for development.
- 4.57. Policy S02: Development in Urban Service Centres (USCs) states that Urban Service Centres provide sustainable locations where development will be permitted which in relation to Lampeter will contribute to the maintenance of its national significance and its role as a strategic centre for Mid Wales and supports current objectives and action plans relating to its Strategic Regeneration Status.

- 4.58. Policy DM03: Sustainable Travel states that development should minimize the need to travel, provide opportunity for and promote sustainable modes of transport in Ceredigion. Parking provision for all modes of transport should be in accordance with Ceredigion SPG. A Transport Assessment should be provided at the thresholds set out in SPG. Where the TA reveals the need for a Transport Implementation Strategy this will need to be secured through a planning obligation.
- 4.59. Policy DM04: Sustainable Travel Infrastructure states that the protection, enhancement, or complementary development of former or existing transport infrastructure with potential to provide for more sustainable travel will be a material consideration in all development.
- 4.60. Policy DM05: Sustainable Development and Planning Gain states that to ensure that development is sustainable, planning obligations securing financial or on site provision will, where appropriate, be sought to Sustainable Travel infrastructure, Sustainable Drainage Systems maintenance, community, educational, health, recreation and open space facilities, protection, enhancement and management of environment interests, Energy, and other facilities and services considered necessary.
- 4.61. Policy DM06: High Quality Design and Placemaking states that development should have full regard, and positively contribute to the context of its location and surroundings. Development should reflect a clear understanding of design principles, the local physical, social, economic, and environmental context.
- 4.62. Policy DM08: Bilingual Signs and Place Names states that permission for signs will be granted providing they do not have an unacceptable impact on, and where possible positively enhance, the visual and linguistic character of the area.
- 4.63. Policy DM09: Design and Movement states that development should be designed to secure a welcoming environment which encourages appropriate through movement.
- 4.64. Policy DM10: Design and Landscaping states that all applications, other than for householder developments which will have an impact on the landscape should be supported by a landscaping scheme.
- 4.65. Policy DM11: Designing for Climate Change states that the LDP will help ensure that development addresses the implications of climate change.
- 4.66. Policy DM12: Utility Infrastructure states that development will be permitted provided that adequate infrastructure exists to facilitate the development and there are no capacity issues and where infrastructure facilities, capacity levels are inadequate and therefore new infrastructure/upgrades/works are required, services are routed underground as far as possible, and the provision constitutes an orderly and coordinated approach to the effective provision of services.
- 4.67. Policy DM13: Sustainable Drainage Systems states that in addition to requirements set out by national guidance, development will be permitted provided that non-residential development of 500m² or more is accompanied by a SUDS that is capable of being adopted by the SUDS Approving Body and a management scheme is submitted detailing the maintenance of the SUDS scheme. If SUDS cannot be implemented a full written justification should be submitted explaining why this is the case.
- 4.68. Policy DM14: Nature Conservation and Ecological Connectivity states that development will be permitted where it protects and, where possible, enhances biodiversity, geodiversity, and ecological connectivity across Ceredigion.
- 4.69. Policy DM15: Local Biodiversity Conservation states that development will be permitted where a step-wise approach is adopted to ensure there will be no significant negative effects to biodiversity and ecological connectivity both on-site and off-site, where appropriate species, habitats and wildlife corridor/stepping stone enhancements have been incorporated into the development through good landscape and building design, or where applicable will be carried out, and where necessary, management plans are produced and agreed with the LPA and developments phased to take into account mitigation and compensation measures.
- 4.70. Policy DM17: General Landscape states that development will be permitted provided that it does not have a significant adverse effect on the qualities and special character of the visual, historic, geological, ecological, or cultural landscapes and seascapes of Ceredigion, the National Parks and surrounding area.
- 4.71. Policy DM18: Policy Special Landscape Areas (SLAs) states that proposals for development within Special Landscape Areas (SLAs) will be assessed in relation to scale and nature of development and their ability to be accommodated without significant damage to, and where possible the enhancement of, the valued visual, historic, geological, ecological, and cultural characteristics of the SLA.
- 4.72. Policy DM19: Historic and Cultural Landscape states that development affecting landscapes or buildings which are of historical or cultural importance and make an important contribution to the character and interest of the local area, will be permitted where the

distinctive appearance, architectural integrity or their settings will not be significantly adversely affected. Where possible development should enhance these qualities and special character.

- 4.73. Policy DM20: Protection of Trees, Hedgerows and Woodlands states that development will be permitted providing:
- it would not remove, damage, or destroy trees, hedgerows or woodlands of visual, ecological, historic, cultural or amenity value unless the need of the proposed development outweighs these values;
 - it is able to mitigate or if necessary, compensate for any negative impacts of the loss or damage;
 - it would achieve appropriate biodiversity gain; and
 - compensation and enhancement measures are mainly native species of local provenance and are not non-native invasive species.
- 4.74. Policy DM22: General Environmental Protection and Enhancement states that in order to help achieve environmental protection and enhancement, proposed development will be permitted provided that it protects and enhances where possible air, soil and the water environment and safeguards water resources, it does not have a significant adverse effect on noise and light levels, a step-wise approach is adopted to ensure that it does not have a significant adverse effect on natural processes and ecosystem services, and, where possible, seeks to restore, achieve favourable condition of or enhance associated features.
- 4.75. Policy LU18: Retail Proposals Countywide states that Change of use to retail, redevelopment or development of new retail or commercial land or buildings will be permitted provided that:
- The scale is in line with that envisaged under Policies S02- S04;
 - Consideration has been given to the likely impact of the development on existing retail provision within the Service Centre, or nearest Service Centre if the proposal is located in a Linked Settlement or other settlement. The conclusion, and the basis for this conclusion, should be presented as part of the planning application;
 - It would not cause a material oversupply of convenience, comparison or bulky goods in the relevant Service Centre or Linked Settlement. The conclusion, and the basis for this conclusion, should be presented as part of the planning application;
 - A3 uses would not cause unacceptable disturbance to the occupiers of nearby properties or adversely affect amenity; and
 - Unless located within a town centre boundary, proposals for units of more than 800m² gross floorspace are accompanied by a Retail Impact Assessment demonstrating how the policy requirements of National Guidance and the LDP have been met.
- 4.76. Policy LU19: Retail Proposals in Urban Service Centres states that change of use to retail, redevelopment or development of new retail or commercial land or buildings in the USCs will be permitted provided that it accords with the requirements set out in Policy LU18, it accords with Policy S01 if the proposal is in relation to an allocated site; and it does not have a significant negative individual or cumulative impact on the vitality and viability of the existing town centre.
- 4.77. Policy LU22: Community Provision sets out how the LDP will help sustain and enhance community provision. This includes supporting the development of new sustainable community provision, and resisting the loss or change of use of an existing.
- 4.78. community provision unless
- 4.79. Policy LU32: Development and the Waste Hierarchy states that development proposals will be required to demonstrate how waste will be minimised and managed in accordance with the waste hierarchy.

Ceredigion Local Development Plan 2007-2022 (LDP) - Volume 2A Settlement Group Statements.

- 4.80. LDP Ceredigion Local Development Plan 2007-2022 Volume 2A Settlement Group Statements sets out the individual Settlement Group Statements and the Proposals Map. The site is not allocated within this document.

Supplementary Planning Guidance

- Ceredigion County Council Parking Standards: identifies how the CSS Wales – Wales Parking Standards 2008 will be applied across Ceredigion. This guidance supplements policy DM03 ‘Sustainable Travel’ of the LDP.
- Built Environment and Design SPG.

- Transport Assessment SPG.
- Community and the Welsh Language SPG.
- Special Landscape Areas SPG.
- Open Space SPG.

DRAFT

5. The Sequential Approach

- 5.1. Paragraph 4.3.18 of PPW 11, Section 7 of TAN 4 (Retail and Commercial Centres) and the Ceredigion LDP state that LPAs should require applications for main town centres uses to be located in town centres. If town centre locations are not available, edge of centre locations are the next preferable, followed by out of centre locations.
- 5.2. Part 7 of TAN 4 (2016) identifies the sequential test approach which requires that only when retail and commercial centres and edge of centre locations have been considered and found to be unsuitable can out-of-centre options within, and then outside, a settlement area be considered.
- 5.3. Paragraph 7.4 of TAN 4 (2016) provides guidance on the application of the test, noting that edge-of-centre proposals should not normally be located more than 200 to 300 metres from the edge of the centre.
- 5.4. The same paragraph also states that the size of the retail and commercial centre, local topography, and presence of physical barriers to access may influence any assessment. For example, it may limit the area that can be considered edge-of-centre for a smaller or more constrained centre.
- 5.5. As the application site is located 270m from the edge of the Lampeter town centre boundary, it is considered 'edge of centre'. Therefore, a sequential assessment of sites within relevant town centres needs to be undertaken.
- 5.6. Local Planning Authorities should ensure that potential sequentially preferable sites are assessed for their availability and suitability, and that all in-centre options have been assessed before less central sites are considered. When considering edge-of-of-centre and out-of-centre sites, preference should be given to accessible sites that are well connected to the town centre. In addition, applicants and Local Authorities are expected to have shown flexibility on issues such as scale and format.
- 5.7. It is acknowledged that the development proposal includes 'main town centre uses', and the site does not lie within an existing designated retail centre. The site is, therefore, considered out-of-centre in planning policy terms, and should be subject to the sequential 'test'.
- 5.8. A sequential assessment has, therefore, been undertaken for the commercial element of these development proposals, which specifically consists of the proposed discount foodstore (Use Class A1) to be occupied by Aldi Stores Limited. For completeness, we have also assessed the proposed Food Village element.
- 5.9. This assessment is based on information regarding the potential availability and suitability of alternative sites. The assessment has been informed by SW Wales Regional Retail Study - Final Report (published in April 2017), and the Current Ceredigion Local Development Plan (LDP1) - 2007 - 2022 (Adopted in 2013) which forms the most up to date policy and retail evidence base for the Council.
- 5.10. The assessment has also been informed by the Lampeter Town Centre GOAD Map and report data from Experian, and the consideration of other recent and relevant application proposals.
- 5.11. A site visit was undertaken by Planning Potential in October 2021 to inspect and assess possible alternative sites within Lampeter town centre, as well as the surrounding area, and to assist in determining whether any other alternative sites should be analysed.
- 5.12. The sites that we have considered worthy of further analysis are all within either town centre, edge-of-centre or out-of-centre locations, and are set out in **Appendix 3**.

Parameters

- 5.13. The PPW confirms that, in reviewing alternative sites, regard should be given to suitability and availability of those sites. These can be defined as follows:
 - Availability – whether sites are available now or are likely to become available for development within a reasonable period of time (determined on the merits of a particular case).
 - Suitability – a site or building's attributes and whether these are sufficient to meet the development requirements of a particular proposal.

- Viability – whether there is a reasonable prospect that development will occur on the site at a particular point in time. Again, the importance of demonstrating the viability of alternatives depends in part on the need that is to be addressed.
- 5.14. Section 3 above outlines the key characteristics of Aldi, including the specific matters relating to the design and layout of an Aldi store. This is an important consideration when analysing the potential sequential sites.
- 5.15. Whilst ‘viability’ is not expressly referenced by PPW or TAN 4 in relation to planning applications, it is our view that viability remains relevant to the consideration of whether sites are ‘suitable’ (for completeness we have therefore included viability within our consideration of sequentially preferable sites).
- 5.16. The above parameters provide a robust and policy-compliant basis for assessment.
- 5.17. In considering the sites, we have had regard to case law that has influenced the interpretation of the NPPF (and PPG). This case law has included the principles established by the Supreme Court in their judgment regarding a challenge by Tesco Stores Limited in Dundee, which was further clarified by the Secretary of State decision at Rushden Lakes.
- 5.18. In the Dundee Supreme Court decision, it is confirmed that when applying ‘flexibility’ to the consideration of alternative sites:
- “it is the proposal for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre”* (Paragraph 37).
- 5.19. And that when applying the sequential test, it should be directed:
- “to what the developer is proposing, not some other proposal which the planning authority might seek to substitute for it which is something less than that sought by the developer”* (Paragraph 38).
- 5.20. The decision confirms that application proposals are generated by “a developer’s assessment of the market and that the criteria of flexibility and realism are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest in doing so.” Applicants should, however, demonstrate flexibility in terms of the scale of development and the amount of car parking required.
- 5.21. The judgment also noted the in-built tension in the test between the suitability of sites and the need for flexibility and concluded:
- “It follows from the foregoing that it would be an oversimplification to say that the characteristics of the development, such as scale, are necessarily definitive for the purposes of the sequential test”*.
- 5.22. More recent guidance has been provided about the application of the sequential test through the Lionbrook case ([2014] EWHC 646 (Admin)) and a High Court judgment relating to an out of centre food retail proposal in Mansfield (Aldergate Properties Limited and Mansfield District Council and Regal Sherwood Oaks Limited; CO/6256/2015; 8 July 2016). This judgment builds on a Secretary of State decision relating to a mixed-use retail proposal in Exeter (Land North of Honiton Road and West of Fitzroy Road; APP/Y1110/W/15/3005333) dated 30 June 2016.
- 5.23. These decisions re-emphasise the ‘town centres first’ principle. They provide further clarity with regard to the assessment of potential sequentially preferable sites in terms of their ‘suitability’, ‘availability’, and the need for the applicant to demonstrate flexibility. In particular, the Mansfield decision confirms that when reviewing potential alternative sites:
- The terms ‘suitable’ and ‘available’ mean suitable and available for the “*broad type of development which is proposed in the application by approximate size, type and range of goods.*” (Paragraph 35).
 - This is to include the requirement for flexibility and “*excludes, generally, the identity and personal or corporate attitudes of an individual retailer*” (Paragraph 35).
 - In terms of a site’s ‘availability’, this relates to a site’s availability for the type of retail use for which permission is sought and not to its availability to a particular retailer (Paragraph 42).
- 5.24. The Mansfield decision therefore confirms that the sites covered by the sequential test search should not vary from applicant to applicant depending on the identity or specific retail model proposed. It is clear, for example, that the requirements of an individual operator, their commercial attitudes, site preferences and competitive preferences should not dictate those sites that are ‘suitable’ or ‘available’ (Paragraph 38).

- 5.25. In the Exeter case, the Inspector concluded (and the Secretary of State agreed) that 'availability' did not require a site to be on the open market to any developer (IR 11.39) and that the requirement to develop other parts of the site did not mean the area identified for retail was not 'available' (IR 11.40).
- 5.26. Since then, there have been several other appeal decisions, which consider flexibility and disaggregation (i.e. whether the whole of the development must be accommodated on one site). These include Honiton Road, Exeter, (APP/Y11110/W/15/300533), which indicated that there could be significant scope to flexibility in terms of the development design and content.
- 5.27. At the Tollgate Village Inquiry (APP/A1530/W/16/314703 Aug 2017) the Inspector concluded that disaggregation was not ruled out by the wording of the NPPF and could, depending on the circumstances of the case, be relevant. The reference to a site being of sufficient size to accommodate "the relevant parts of the development" in the decision (APP/P0119/V/17/3170627 Decision Letter Paragraph 20) on the extension to the Mall at Cribbs Causeway also indicates disaggregation, although it is not clear in that decision what the relevant parts were.
- 5.28. Also of relevance is the case at Leamington Shopping Park, Tachbrook Park Drive, Warwick (Appeal Ref: APP/T3725/W/18/3204311). The inspector stated that the appeal did have certain characteristics, which could lead them to question whether it is appropriate to consider the option of disaggregation in this case. The inspector continued that there is no requirement in current Government policy or guidance for disaggregation to be considered. Equally, however, there is no specific prohibition of disaggregation in either the Framework or the Planning Practice Guidance (PPG).
- 5.29. In summary, alternative sites have to be suitable for the type of development proposed, but this is subject to a requirement for flexibility from the developer. The extent of flexibility is not a matter of interpretation for the courts, but is a planning judgement which rests, in the first instance, with Local Planning Authority.
- 5.30. Furthermore, the requirements of individual operators are not generally relevant to the implementation of the test and sites should be assessed for their suitability for the broad type of development proposed. The period in which sites should be available is also a matter of planning judgement, which will vary from case to case, and should be considered in relation to specific sites.
- 5.31. The sequential assessment set out below has been undertaken in the context set by both relevant planning policy and the clarification provided through these decisions.

The Development Proposed and Flexibility

- 5.32. Paragraph 7.5 of TAN4 states that 'developers and retailers should be flexible and innovative about the format, design and scale of proposed development and the amount of car parking needed, tailoring these to fit local circumstances.'
- 5.33. A sequential assessment has been undertaken for the commercial element of this development proposal. In undertaking our sequential assessment, we have considered the potential for alternative sites in the built-up area of Lampeter, particularly the Lampeter town centre and surrounding area, to accommodate the broad type of development proposed.
- 5.34. The application proposal comprises two commercial elements. The main element is for a food retail store with a gross area of 1,855 sq. m, and a net sales area of 1,351 sq. m. This sales area would display largely prepacked convenience goods alongside a small range of comparison goods under time-limited special offers. No ancillary services or concessions are to be provided (e.g. café, tobacconist, dry cleaning, pharmacy), nor would any specialist food counter (e.g. butcher, fishmonger, deli) be provided.
- 5.35. A food store of this scale and type would typically require a minimum of 100 parking spaces. Provision below this level would lead to the car park reaching its capacity on a regular basis, which could lead customers to shop elsewhere, or encourage parking on local streets. It would also compromise the safety of pedestrians within the car park.
- 5.36. A site would also need to allow a HGV to make deliveries in a safe and efficient manner. This requires the necessary space for manoeuvring and a dedicated loading dock so goods can be moved on and off a vehicle straight into the store.
- 5.37. The size of a site that could accommodate such a store varies with context, but it is considered that sites extending to approximately 0.7 hectares would best allow the reasonable requirements of a food retail store of this nature to be accommodated (access, parking, servicing, and landscaping).

- 5.38. In considering potential alternative sites, however, we have also applied what we consider to be a reasonable level of flexibility with regard to the broad type of development proposed by reference to its approximate site, type, and range of goods, which are key credentials of a discount foodstore.
- 5.39. In practical terms, such a store is at the lowest end of what would be reasonably considered a modern supermarket or main-food shopping destination. A store of this size would enable a retailer to provide and display a streamlined range of convenience goods, while also taking into account the space requirements for lobbies, walkways checkouts, back of house storage space, staff and customer facilities.
- 5.40. Notwithstanding this, while undertaking the sequential assessment, consideration was given to whether a store could reasonably be accommodated on a smaller site, where appropriate.
- 5.41. The second, and smaller, element of the proposal is the 'Food Village' hub, which comprises three pod units of 23 sq. m each.
- 5.42. The pod units will be used by local food producers to showcase and celebrate their products. The primary use of the pods will be for promotion and educational purposes, but there may be some ancillary retail, namely sales of local products.
- 5.43. The Food Village will also provide an opportunity to provide space for organisations linked to food and nutrition research, such as those linked to Food Centre Wales, Horeb and UWTSO.
- 5.44. The Food Village will have a small parking area of up to 25 spaces.

Assessment of Sites

- 5.45. As set out previously, the assessment of units and sites is provided at **Appendix 3**.

Sequential Assessment Conclusions

- 5.46. Our research has identified sites that are worthy of further consideration. Planning Potential has undertaken an extensive review of these sites. The analysis sets out why they do not represent suitable, available, or viable sequential alternatives to accommodate the proposed development.
- 5.47. For the avoidance of doubt, it is considered unnecessary to analyse any further sites within Lampeter or other centres, as any such sites are no more sequentially preferable than the application site.
- 5.48. On the basis of the above consideration of alternative sites, we consider that there are no alternative sites located in or on the edge of defined retail centres that should be considered sequentially preferable to the application site. The proposed development site is, therefore, considered to represent the only site suitable, viable and available for the type of development proposed.
- 5.49. On this basis we conclude that the site should be considered to comply with the sequential approach to site selection and in particular Paragraph 4.3.18 of PPW 11, Section 7 of TAN 4 (Retail and Commercial Centres), and the Ceredigion LDP.

6. Retail Need and Impact Assessment

- 6.1. This section of the report sets out our assessment of the economic implications of the proposed Aldi development. The retail need and impact analysis is presented as a series of tables, which are included in **Appendix 4**.
- 6.2. The application site is in an edge-of-centre location in retail policy terms, situated some 270 metres to the west of Lampeter town centre. It is therefore subject to the retail need, impact and sequential site assessment tests set by PPW, TAN4 and policies LU18 and LU19 of the Ceredigion Local Development Plan 2007-2022 (adopted in 2013).
- 6.3. Edge-of-centre stores have the potential to generate pedestrian linked trips with nearby town centres and to enhance their trading performance. Where new stores are developed adjacent to town centres in predominantly rural areas, these benefits tend to be magnified through expenditure 'clawback' (the retention of retail spending currently attracted to distant locations, such as Aberystwyth).
- 6.4. Although trade diversion has been calculated in our analysis, as required by policy, there is potential for impact to be mitigated due the close proximity of the new Aldi store to the town centre; the associated pedestrian linkage; and its ability to increase expenditure retained in Lampeter (with associated sustainability benefits). We consider this matter in further detail below.
- 6.5. The proposed floorspace (a total of 1,855 sq. m GIA) is below the relevant threshold for the retail impact test set by national policy (2,500 sq. m. gross), although higher than the 800 sq. m. threshold set out in LDP Policy LU18. The assessment below responds to this policy requirement.

Health Check of Lampeter Town Centre

- 6.6. Before assessing the potential impacts of a proposed retail development, it is important to establish the current condition of relevant retail centres. This is done by undertaking a town centre health check.
- 6.7. TAN 4 provides advice on indicators that should be taken into consideration, and these form the basis of our assessment.
- 6.8. Given the location and nature of the proposed development, the assessment focusses on Lampeter.
- 6.9. To carry out the health check of Lampeter town centre, a visit was made to the centre on 06 October 2021. Existing available evidence has also been considered, including the South West Wales Regional Retail Study 2017, and a Goad Centre Report for Lampeter.
- 6.10. A GOAD Plan for Lampeter has also been obtained, and was updated following the October 2021 site visit.
- 6.11. It should be noted that our site visit in October 2021 was undertaken when Covid-19 restrictions on movements had been fully removed.
- 6.12. It should, however, be acknowledged and accepted that not all indicators listed in TAN 4 are relevant in this case (due to the small size of Lampeter) and it is not possible to obtain information for some of the indicators given its limited scale.

Diversity of Uses

- 6.13. The town centre is principally formed by the retail frontages along High Street, Bridge Street and College Street, with Harford Square at the centre. A summary of the uses located within Lampeter is set out below. This is based on the information from a Lampeter GOAD Town Report based on data from December 2020. Following our site visit this information seems an accurate representation.

Category	Lampeter (%)	UK Average (%)
Comparison	31.78%	27.09%
Convenience	7.75%	9.17%
Retail Service	16.28%	15.64%
Other Retail	0%	0.07%
Leisure Services	22.48%	24.58%
Financial & Business Services	10.85%	9.14%
Vacant	10.85%	14.18%

- 6.14. It is clear that comparison goods retailing forms the large proportion of the units within the town centre, consisting of 32% of the total number units. This is a higher proportion than the UK average. The comparison units are spread across a range of retail sub-sectors such as furniture, electricals, clothing, and gifts. There are few national multiples in the town centre, with the vast majority being higher quality independent retailers.
- 6.15. The convenience goods offer in Lampeter consists of two main stores: Sainsbury's on Market Street, and Co-op on Lower Bridge Street (although this is outside of the defined town centre boundary). There are a number of small outlets such as Premier and smaller independents such as Jones Brothers Butchers. In total, the convenience goods offer is 7.75% of the total units within the town centre. This is slightly below the national average of 9.17%, showing the centre isn't heavily reliant on this sub-sector.
- 6.16. The centre also comprises a good number of retail services, leisure uses, and financial & business services, all of which account for a good proportion of the town centre, similar to the UK national average.
- 6.17. In respect of the vacancy rate, the Goad Report states this is 10.85% which is somewhat lower than the national average of 14.18%. This is considered further below.
- 6.18. In conclusion, we consider that Lampeter town centre consists of a good mix of uses, which are diverse in nature, reflective of a town centre serving the local population and the strong tourism industry in the area.

Balance between Independent and National Multiple stores

- 6.19. As outlined above, the comparison and convenience goods sectors within Lampeter are formed by both national multiple and independent retailers. This is also the case for the service sector.
- 6.20. The national multiple retailers within the centre include Sainsbury's, Co-op, Premier and Boots. National banks include Principality, Lloyds and Halifax. The total 'multiple' outlets within Lampeter comprise just 12% of the total units.
- 6.21. It is therefore clear that independent retailers and service operators comprise the largest proportion of the units within the town centre. These independent outlets are spread across the centre and include the Welsh Quilt Centre, Artisans Café, Granny's Kitchen, Gwilym Price Furniture, Y Becws Bakery, and Jones Brothers Butchers. There are also a number of independent public houses, hotels, and regional professional services units (such as John Francis Estate Agents).
- 6.22. Given the dual role of Lampeter as a town centre for the local population and a tourist destination, it is considered that the town centre strikes a good balance between multiple and independent stores and other uses. The national multiple outlets generally provide larger format convenience stores, while local independent uses provide locally sourced and artisanal products which adds distinctiveness to the town.

Vacancies

- 6.23. It can be seen from the table above that the vacancy rate in the town centre is below the national average. During Planning Potential's visit in October 2021 there were only 14 vacant units in the town centre. This is exactly the same number stated in the December 2020 Goad Report which shows the vacancy rate has remained stable over the past 12 months.
- 6.24. Furthermore, the vacant units are generally spread throughout the centre, with only one small grouping of vacant units at 17, 18 and 19 Harford Square. Additionally, several of the vacancies are on the extreme periphery of the centre, including a vacancy on Station Terrace, 85 Bridge Street, and 13 Drovers Road.
- 6.25. Although vacancies can appear in even the most healthy of centres, it is therefore clear that Lampeter is performing well and an attractive place to operate given the limited number of vacant units, and the fact the vacancy rate has remained stable, especially given the effects of the Covid-19 pandemic.

Commercial yields and rents on non-domestic property

- 6.26. As stated within the SWW Retail Study, there is very limited data relating to commercial yields and rents in Lampeter. However, it is understood that the primary locations of the town are likely to be currently achieving yields of between 10% and 12%, and Zone A rents of between £160/sq. m. and £200/sq. m.

Pedestrian Flows

- 6.27. When Planning Potential undertook a site visit to Lampeter in October 2021, there seemed to be a good level of footfall throughout the town centre. There were, however, locations of higher pedestrian flows, most notably around Market Street near Sainsbury's, and Harford Square in the centre of the town.
- 6.28. Bridge Street was also relatively popular with pedestrians due to its mix of retail, service and café uses.
- 6.29. The further from Harford Square the lower the footfall tends to be, in particular the upper part of College Street, western end of High Street, and the southern end of Bridge Street (with the exception of around the Co-op store).
- 6.30. It is considered that there are good pedestrian flows throughout the town centre, which is indicative that the centre as a whole is vibrant and performing well.

Accessibility

- 6.31. The town centre is accessible by various means of transport including walking, cycling, bus, and car.
- 6.32. The pedestrian flows across the town centre have been discussed, but it was apparent from our site visits that people do walk to the centre from the surrounding residential areas given the small scale of Lampeter.
- 6.33. Due to the size of the town, cycling is also possible, with cycle parking provided at various points across the town.
- 6.34. Car parking is provided throughout the town centre. This includes the Sainsbury's car park in the centre of the town (which provides circa 69 spaces), the Rookery car park on Peterwell Terrace (which is pay and display and provides circa 100 spaces), and the Cwmins car park (which is pay and display and provides 87 spaces). These car parks are spread around the town centre, providing convenient car parking for visitors.
- 6.35. There are a number of bus stops located in various positions on the main routes through the town centre including High Street, College Street and Bridge Street.
- 6.36. The no. 585 bus service provides a link to Aberystwyth via Tregaron. This runs six services per day, Monday to Saturday. The 588 also provides a similar service.
- 6.37. The no. 689 bus service provides a link between Lampeter and Crug-y-Bar, along the A482, on Mondays and Thursdays only.
- 6.38. There are also other more local services, which provide less frequent services, including the no. 618 to Talsarn via Llangeitho, and the no. 687 to Rhydcymerau.
- 6.39. Lampeter does not benefit from a train station.
- 6.40. In conclusion, it is clear that Lampeter town centre is accessible by various means of transport, which ensures it is attractive to a wide range of the local population and tourist industry, and contributes to the centre's vitality and viability.

Town Centre Environmental Quality

- 6.41. The town centre's environmental quality overall is of a high standard, with some historic buildings and attractive architecture, together with more modern retail premises. There are little or no signs of vandalism or graffiti on buildings, and there is very little litter in the town centre.
- 6.42. The town centre does not benefit from any pedestrianised areas.
- 6.43. There are several listed buildings in the town centre including The Black Lion Hotel, the former Town Hall building, The Royal Oak, Harford Fountain, Lloyd's Bank, and St David's University Lodge.
- 6.44. In the centre of the primary shopping area is Harford Square, which contains public seating and a small fountain.
- 6.45. Within the town centre are several green spaces, including at the junction of Temple Terrace and Church Street, the grounds of St Peter's Church, and the university campus to the north-east. These add to the town centre's aesthetic appeal and provide areas for people to sit in an attractive environment.
- 6.46. It is considered that the town centre environmental quality is of a high standard.

Perception of Safety and Occurrence of Crime

- 6.47. We consider that there was a good perception of safety when Planning Potential undertook a visit in October 2021.
- 6.48. Crime levels are low in Lampeter due to the small scale of town and the rural nature of its surroundings.
- 6.49. We therefore do not consider there to be a high perception of crime or risk to visitors safety.

*Other Factors**Barriers to New Businesses Opening and Existing Businesses Expanding*

- 6.50. There do not appear to be any significant or obvious barriers to new businesses opening or existing businesses expanding. The level of vacant units in the town centre is approximately 10% which enables a natural turnover of occupiers to occur, and new operators to commence trading.

Evening and Night Time Economy

- 6.51. Although our October 2021 site visit did not take place in the evening/night time hours, it was clear from the visit that relative to the scale of the town, there is good representation from independent pubs and restaurants.
- 6.52. Such establishments, including The Ivy Bush Inn, Gwesty'r Castell Hotel, Black Lion, The Royal Oak, as well as several restaurants, all provide destinations for visitors and residents late into the evening which adds to the centre's vibrancy.
- 6.53. Furthermore, as outlined above, the leisure services account for 22.5% of the total number of units within the town centre, which is broadly in line with the UK average. While it is acknowledged that not all of the service operators will open late into the evening, it is understood that several do, which demonstrates the strength of the leisure sector, and the availability and offer within the evening economy.
- 6.54. It is considered that the opening hours, availability, and extent to which there is an evening and night time economy offer provides a positive impact on the overall vitality and viability of Lampeter town centre.

Conclusion on Health of Lampeter Town Centre

- 6.55. We consider that Lampeter town centre is performing well and fulfils its role as a town centre and tourist destination. Indicators confirm that the centre is viable and resistant to change through a diverse mix of uses (including high quality independent businesses), it is not reliant on one particular sub-sector, there is a low level of vacant units, and due to the compact nature of the centre it is highly accessible.
- 6.56. The town centre is attractive, with high quality architecture visible, it is safe, with low risk and perception of crime, and the centre provides an offer through the daytime and evening. These attributes demonstrate that the centre is a vital and vibrant location that is not vulnerable to retail impact.

Data Sources and New Household Survey

- 6.57. The retail evidence base for the emerging Ceredigion Local Development Plan ('LDP2') is the South West Wales Regional Retail Study ('SWWRRS'). This has been prepared by Carter Jonas ('CJ') for Ceredigion and Pembrokeshire Councils (as a joint instruction) and was published in February 2017.
- 6.58. The retail analysis contained in the SWWRRS is underpinned by a household survey undertaken by NEMS Market Research. The was completed in August 2016 and involved 1,607 telephone interviews of resident households conducted across 16 zones in Ceredigion, Pembrokeshire, and neighbouring areas. The zones were defined to explore shopping patterns at a local level. The retail capacity analysis prepared by CJ and published in the SWWRRS is based substantially on survey outputs together with a range of other data sources. These have been drawn upon to estimate other inputs to the analysis, including, for example, tourism expenditure inflow.
- 6.59. To ensure that this Retail Assessment is based on up-to-date information relating to local shopping patterns, this supporting material has been updated. Planning Potential has therefore commissioned a new, bespoke household telephone survey in support of the impact analysis. This has also been undertaken by NEMS and was completed in March 2021.

- 6.60. The new NEMS survey is based in broad terms on a sub-set of the zones defined for the purposes of the SWWRRS (CJ zones 10, 11, 12, 13 and 14). The new zones (numbered 1 to 5) are, in aggregate, assumed to form Lampeter's catchment area for convenience and comparison shopping. In total, 500 interviews have been conducted by NEMS (approximately 100 per zone). NEMS has confirmed that survey outputs are statistically significant.
- 6.61. In combination with data relating to local expenditure by zone (obtained from 'Precisely'), the household survey has been used to quantify base and design year turnovers, and retail impacts (both solus and cumulative). The methodology used to assess impact and need is described below.
- 6.62. Our analysis focuses on the convenience goods impact of the proposed Aldi store. Aldi stores are a primarily convenience goods shopping destination with only a small element of floorspace given over to comparison goods (typically 20%). Additionally, the comparison goods on sale in an Aldi store are predominantly temporary in nature. The products are typically time-limited 'special buys'; once the goods are sold, they are not restocked. As a result, the non-food comparison goods are ancillary to the primary purpose of the proposed store and are considered de minimis.
- 6.63. Drawing on our analysis of convenience goods impacts, and comparison goods turnover estimates taken from the SWWRRS, we have estimated the overall impact of the proposal on the total turnover of Lampeter town centre (convenience and comparison goods combined) in the design year. This includes comparison goods sales generated by the new Aldi store. The basis of this additional analysis is described below and included in Appendix 4 (Table 14).

Assessment

- 6.64. The proposed development is a discount foodstore with a gross internal floorspace of 1,855 sq. m, and a net sales area of 1,315 sq. m, and a convenience goods sales area of circa 1,052 sq. m (80%). The application is submitted on the basis that Aldi will be the end-user, and this is reflected in our assumptions below.
- 6.65. The assessment directly addresses the policy context as set out in Section 4 above, including the retail need and impact 'tests' identified in both PPW and TAN4.

Methodology

- 6.66. Drawing on the 2021 NEMS household survey and elements of the SWWRRS, we have adopted a conventional step-by-step, trade draw methodology to assess retail impact. This is based on an estimate of store turnover (and supporting catchment area expenditure) in the 'design' year, and a series of judgements relating to the proportion of turnover estimated to be diverted from existing centres and stores.
- 6.67. To ensure that a suitably fine-grained analysis of retail impact is presented, we have adopted a 'trade draw' approach to modelling the effects of the proposed development. In so doing, we have utilised the 2021 household survey data to model existing trade draw patterns across the catchment area, together with other data sources (principally the SWWRRS) to estimate trade inflow.
- 6.68. We have used the existing data to inform judgements about those survey zones from which the application proposal is likely to draw its trade. Our assessment identifies existing stores and shopping destinations within those zones, trade draws and impacts. These judgements reflect factors such as scale, nature of retail offer, location/distance, and extent of 'trading overlap' (or competition), underpinned by the principle of 'like competing with like'. Proximate facilities with a similar catchment, and trading in the same market sector, will experience the greatest impacts applying these assumptions. Conversely, distant facilities of a differing scale and nature (such as local facilities and convenience stores catering for day-to-day needs) will be far less likely to experience diversion of trade.
- 6.69. This methodology is widely applied in retail assessment work and reflects that advocated in relevant national policy (e.g., TAN4 paragraph 6.3). This approach is logical, robust, transparent, and proportionate.
- 6.70. There are seven main steps underlying this approach:
- Step 1: define a catchment area and quantify population and spending
 - Step 2: identify base and design years for the assessment
 - Step 3: estimate the turnover of existing centres and retail destinations

- Step 4: identify market shares and inflow (drawing, wherever possible, on statistically significant and up-to-date survey data), to assess retail capacity in the design year, including consideration of the potential to increase the proportion of retained expenditure
- Step 5: estimate the turnover of the application proposal and retail 'commitments' (other proposals in the catchment area with planning permission)
- Step 6: apportion the turnover of the subject proposal to stores/centres using a trade draw methodology, based on an understanding of location/proximity and the extent to which the proposal will compete with existing facilities (centres and schemes in the same market sector having the greatest propensity to divert trade from comparable facilities).
- Step 7: quantify trade diversion (impact), including cumulative impacts, and assess the significance of the predicted impacts for established centres.

- 6.71. Impact within the assessment is expressed as a percentage of existing centre/retail destination turnover diverted to the proposal in the design year.
- 6.72. Retail capacity identified through Step 4 of the process, combined with consideration of qualitative factors (existing provision, shopping patterns/outflow, presence/absence of key fascias etc.) forms the basis for an assessment of retail need.

Assumptions and Assessment Parameters

- 6.73. The principal supporting assumptions and assessment parameters adopted within our analysis are as follows:
- Base and design years: base year of 2021 (the current year) and design year of 2026.
 - Price Base: constant 2019 prices.
 - Catchment Area: defined as the new NEMS household survey zone area, comprising a core/home zone (Zone 1) and four external zones (Zones 2-5).
 - Population and Expenditure: this data is sourced directly from Precisely and relates to each of the five household survey zones (as defined in the NEMS 2021 survey).
 - Turnover of existing convenience stores: derived directly from the results of the 2021 survey and generated expenditure in each survey zone.
 - Retail Capacity: based on existing market shares, inflow and assumptions relating to increased trade retention.
 - Turnover of proposal and commitment: calculated from net floorspace and the sales density of Aldi derived from Mintel Retail Rankings. The resulting 2021 sales densities are £12,126/sq. m. for convenience goods and £10,538/sq. m. for comparison goods. Identical sales densities have been used to estimate the turnover of the Aldi commitment in Aberystwyth.

Retail Assessment – Impact and Need

- 6.74. The analysis is set out in a series of tables in **Appendix 4**. The assessment tables are described below:

Population and Expenditure (Tables 1 to 3, Appendix 4)

- 6.75. Tables 1 and 2 show populations by zone between 2019 and 2026, and per capita convenience expenditure (also by zone and year). This data has been obtained from Precisely (formerly Pitney Bowes), a reliable source of retail economic data.
- 6.76. Table 3 shows available convenience goods expenditure generated by the resident population within each zone in base (2021) and design years (2026). This is derived from the population and expenditure data within Tables 1 and 2. Total available convenience goods expenditure is projected to increase by +£9.72 million over the 5-year assessment period, equivalent to approximately three-quarters of the convenience goods turnover of the Aldi store in 2026.

Shopping Patterns (Table 4, Appendix 4)

- 6.77. Table 4 shows the existing distribution of convenience goods shopping trips as derived from the 2021 household survey. This data is based on respondents' stated shopping preferences, with two main and two top-up destinations identified in order of preference, disaggregated by zone.
- 6.78. The data shows the significant outflow of main food household shopping trips to locations outside of the Lampeter 'home zone' (Zone 1), indicative of the potential of a new foodstore in Lampeter to improve trade retention and reduce the need to travel to large stores further afield.

Survey Derived Turnover of Stores in 2021 and 2026 (Tables 5a-6, Appendix 4)

- 6.79. Table 5a applies the shopping patterns from Table 4 to the total expenditure at 2021 (as set out in Table 3). This generates the total convenience goods turnover of each identified destination (sub-divided into main and top-up expenditure) from residents within Zones 1 to 5.
- 6.80. Table 5b provides a composite of all convenience shopping expenditure from each zone (main and top-up combined), and the overall market share of each destination by zone (turnover expressed as a percentage of expenditure). Table 5c replicates Table 5a but applies shopping pattern data to 2026 spending by zone to generate design year turnovers (turnover derived from the catchment area only).
- 6.81. Table 6 summarises the data from Tables 5a-5c but includes tourism inflow to quantify total convenience goods turnovers by destination. The inflow percentages are taken from Table 7 (Appendix 5) of the SWWRRS. These have been estimated by CJ and are considered appropriate for the purposes of our analysis.
- 6.82. For those centres most relevant to the assessment (such as Lampeter), Table 6 shows total estimated convenience goods turnovers. These turnovers are considered robust for the purposes of quantifying impact. The turnover of locations beyond and on the periphery of the survey area are partial only, as they exclude sources of potentially available spending.

Estimated Turnover of the Proposal and Trade Draw (Tables 7a-7b, Appendix 4)

- 6.83. Table 7a sets out the estimated convenience and comparison goods turnovers of Aldi proposal in both the base (2021) and design year (2026). These are based on sales density data published by Mintel Retail Rankings (and verified by Aldi).
- 6.84. The net convenience sales area of the proposed store is 1,052 sq. m. Applying a turnover ratio of £12,126/sq. m. to net convenience floorspace generates a convenience turnover of £12.76 million in 2021, increasing to £13.01 million per annum in 2026 (with allowance for floorspace efficiency increases).
- 6.85. Table 7b shows the estimated percentage draw of the Aldi store turnover from each household survey zone in the design year, after allowance for 'tourism inflow' (assumed to comprise 16.2% of turnover based on CJ estimates). Based on the draw of existing facilities in Lampeter from the survey area, most of the expenditure is assumed to originate from the 'home zone' (zone 1) (75%), with the remaining 25% drawn from other zones. This pattern of assumed trade draw by zone informs the assessment of impact in subsequent tables.

Solus Convenience Goods Impacts (Tables 8 and 9, Appendix 4)

- 6.86. Table 8 sets out in full the outputs of our trade draw impact model drawing on household survey findings, notably the market share analysis derived from the survey as shown in Table 5b. Table 8 shows both the direct outputs of the model, and adjustments to trade draws made by PP to account for qualitative factors (those factors outlined in paragraph 6.68 above). The impact analysis based on these judgements is summarised in Table 9.
- 6.87. Drawing on this analysis and the earlier tables, we estimate a solus convenience goods impact of -10.8% on Lampeter town centre in the design year (2026) (Table 9). Lower impacts are predicted on other defined centres.
- 6.88. This percentage diversion assumes trade withdrawal without countervailing, beneficial impacts on Lampeter town centre. As highlighted above, these are likely to occur due to relative proximity and pedestrian linkage (the application site being located within a short walking distance of the town centre), and trade clawback (the increased retention of spending, particularly main food expenditure, facilitated by the development of a new Aldi store).

6.89. Post-development there would be an increased propensity for resident households to undertake main food shopping in Lampeter, rather than travel to alternative locations (such as Cardigan, Aberystwyth and Carmarthen). The current unsustainable pattern of expenditure outflow is evident in survey findings. For these reasons, the forecast impact on Lampeter town centre is considered to represent a worst-case scenario.

Cumulative Convenience Goods Impacts (Tables 10-12, Appendix 4)

6.90. We have considered cumulative impacts as part of our assessment as required by policy. Tables 10 and 11 show the forecast turnover of the committed Aldi store in Aberystwyth, and its estimated draw by zone (informed by household survey findings).

6.91. As in the case with the application proposal, we have allowed for tourism inflow. This is also based on estimates taken from the SWWRRS (16.2% in the case of Aberystwyth, Table 7, Appendix 5). Identical sales densities have been applied to derive store turnover in the design year based on published data (Mintel) resulting in a convenience goods turnover of £11.21million in 2026.

6.92. Cumulative impacts with the application proposal are set out in Table 12. These are based on an identical methodology to that described above, with adjustments made to reflect qualitative factors. The analysis assumes a development sequence commencing with the Aldi in Aberystwyth, with the Lampeter store impacting on this store in addition to other destinations in the design year. The resulting forecast cumulative impact on Lampeter town centre is -12.1% in 2026.

6.93. The matters set out at paragraph 6.88 above are equally applicable to the cumulative analysis. Countervailing benefits will mitigate and offset negative impacts and this forecast diversion should be considered 'worst case' for this reason.

Retail Capacity and Need (Table 13, Appendix 4)

6.94. Retail capacity analysis relating to the survey area is set out in Table 13. Table 13 shows the relationship between turnover and expenditure, the resulting market share (in the survey area as a whole), expenditure inflow, and potential retail capacity assuming a modest increase in retained spending.

6.95. The assessment assumes 'equilibrium trading' in the base year (2021) (a balance between turnover and expenditure resulting in a zero requirement for additional floorspace). Capacity in the design year is then projected from this baseline position. This approach is commonly applied in retail assessment work; indeed, a similar methodology has been adopted by CJ in the SWWRRS with a 'zero requirement' (equilibrium trading) assumed in 2016 (see, for example, SWWRRS, Appendix 8A, Table 1).

6.96. Table 13 shows convenience goods expenditure capacity of £5.79 million in 2026 assuming constant market shares. This is insufficient to support the turnover of the proposed store. However, there is potential within the survey area to increase the proportion of retained convenience expenditure, and this is shown as an alternative projection in Table 13. This is a highly probable outcome if both the application proposal and commitment are developed within the assessment period.

6.97. Based on a modest, +5% increase in market share, and an associated increase in inflow, capacity rises to +£18.63 million. This is greater than the forecast turnover of the application proposal, but insufficient to support the convenience goods turnovers of both Aldi stores (Lampeter and the committed store in Aberystwyth), with a shortfall of -£5.60 million in 2026. In highlighting this issue, however, it is important to recognise that the Aberystwyth store benefits from an extant planning permission; the need for this store has already been demonstrated and accepted.

6.98. We conclude that a partial quantitative need has been demonstrated for the application proposal based on an equilibrium capacity model underpinned by an up-to-date household survey.

6.99. Paragraphs 4.3.13 to 4.3.17 of PPW provide guidance with reference to the application of the 'need' test. Paragraph 4.3.15 advises that precedence should be given to quantitative need, but when qualitative need is considered, the advice confirms that consideration should be given to both positive and negative aspects.

6.100. In this case, there are clear qualitative deficiencies currently in convenience shopping provision in Lampeter. A positive outcome can be anticipated if the Aldi store is developed. The following factors are material to an assessment of qualitative need in this case:

6.101. Choice in foodstore provision in Lampeter is currently limited to an out-of-centre Co-op and a small, in-centre Sainsbury's store, together with top-up and independent provision. Lampeter lacks a modern, high quality foodstore of the type commonly found in towns of similar size and neither of the larger stores offer the scale and quality of provision that shoppers now expect. Choice in main food shopping is therefore extremely limited and there is no discounter provision in Lampeter whatsoever.

- 6.102. PPW (4.3.16) indicates that qualitative need may be an important issue for a development where it addresses the following:
- Supports the objectives and retail strategy of an adopted development plan or the policies in this guidance;
 - Is highly accessible by walking, cycling or public transport;
 - Contributes to a substantial reduction in car journeys;
 - Contributes to the co-location of facilities in existing retail and commercial centres;
 - Significantly contributes to the vibrancy, attractiveness, and viability of such a centre
 - Assists in the alleviation of over-trading of, or traffic congestion surrounding, existing local comparable stores;
 - Addresses locally defined deficiencies in provision in terms of quality and quantity, including that which serve new residential developments;
 - Alleviates a lack of convenience goods provision in a disadvantaged area.
- 6.103. The proposal meets several of the above criteria as set out below.
- 6.104. The application proposal will improve competition and choice, particularly in main food shopping and discount provision, and remedy current qualitative deficiencies.
- 6.105. Lack of choice is reflected in current patterns of shopping. There is an outflow of convenience goods shopping trips to peripheral locations evidenced by the results of the household survey. The distances travelled are significant in some cases and the resulting shopping patterns unsustainable. For example, 15% of households in zone 1 (the Lampeter 'home zone') undertake their first-choice, main food shopping at the Aldi and Tesco stores in Carmarthen, a return journey of approximately 48 miles via the shortest route, or two hours (return) by bus. This compares with 6.4% of households in zone 1 using the Co-op store in Lampeter for first choice, main food shopping. Through these patterns of shopping households are expressing a clear preference for alternative provision in surrounding areas.
- 6.106. The application proposal will increase expenditure retention in Lampeter and reduce unnecessary journeys, particularly those made by car, leading to a substantial reduction in journey length. This will reduce the length of journeys made, especially by car, which has significant sustainability benefits.
- 6.107. Enhanced competition and choice are likely to bring wider benefits to the retail economy of Lampeter town centre. The application site is highly accessible to a variety of modes of transport, including those choosing to shop on-foot. The site's proximity to the Lampeter town centre is likely to result in pedestrian linked trips, generating positive spin-off for town centre businesses. This benefit will be further enhanced by the reduction in outflow and an increase in retained spending.
- 6.108. Wider economic benefits are likely to materialise if an Aldi store is developed on the application site.

Conclusions on Retail Need

- 6.109. The majority of the combined convenience goods turnovers of the application proposal and the committed Aldi store in Aberystwyth is supported by surplus expenditure capacity in 2026. There is therefore a demonstrable, though partial quantitative need for both stores within the catchment area.
- 6.110. Within Lampeter and the immediate 'home zone' (zone 1), there is clear and unequivocal evidence of qualitative need applying PPW guidance, as highlighted above.
- 6.111. We conclude that the needs test is met in this case, and that the proposal complies with this component of retail policy.

Waterstone Estates Limited – Court of Appeal Judgment (July 2018)

- 6.112. The Waterstone Estates judgment is often referenced in connection with the retail 'needs' test. The judgment confirms that whilst the establishment of retail 'need' is a discrete requirement of planning applications (for retail development outside town centres), that is not the end of the matter. The judgment states (paragraph 70):

6.113. "It is not true to say that if an application for planning permission for new retail development cannot establish need, then that is fatal to the application. National planning policy is of course a material consideration; but a policy is only a policy. If a particular policy requirement is not met, it must be open to the decision maker to grant planning permission if other material considerations outweigh identified planning harm including harm that results from a failure to comply with that requirement. Even proposed development that is contrary to the local development plan, which has the entrenched importance given to it by Section 38(6), may be granted planning permission if other material considerations outweigh that inconsistency." (Our emphasis).

6.114. We consider that a retail need does exist for the application proposal and that the relevant test is passed, but in any event, there are weighty material considerations that justify the grant of planning permission in this case.

Conclusions on Retail Impact

6.115. The analysis set out in Tables 1-12 (Appendix 4) and described above, and the outputs of our town centre 'health check', confirm that solus and cumulative convenience goods impacts associated with the Aldi proposal are within acceptable parameters. The assessment demonstrates that the impact test set by policy is passed in this case. Further detailed analysis in support of this conclusion (referencing relevant TAN4 criteria) is presented below.

6.116. To explore this issue in further detail and to allow for comparison goods trading, we have assessed in broad terms the overall impact of the proposal on the total turnover of Lampeter town centre. This analysis is set out in Table 14.

6.117. Table 14 shows the total turnover of Lampeter town centre drawing on our convenience goods estimates (Table 6), combined with comparison goods turnovers derived from the SWWRRS (Appendix 6, Table 7), converted to 2019 prices.

6.118. Solus and cumulative convenience goods impacts are taken from Tables 9 and 12. Comparison impacts have been quantified in broad terms assuming that 25% of the Aldi store's (comparison goods) turnover is diverted from Lampeter town centre in 2026 (with 10% of the commitment's turnover – Aldi, Aberystwyth - included in the cumulative scenario). Comparison impacts, whilst quantified in broad terms only, are considered robust and 'worst-case'.

6.119. Table 14 shows a solus impact of -4.9% on total town centre turnover in 2026, increasing to -5.9% in the cumulative scenario. Importantly, even factoring in cumulative diversions, Table 14 demonstrates that the turnover of the town centre is projected to increase by +£2.66 million (+6.8%) between 2021 and 2026. This confirms that cumulative impacts are most unlikely to be harmful.

Assessing the Significance of Impact for Existing Centres

6.120. TAN4 (paragraph 8.3) identifies the impact considerations against which planning applications for retail uses (in edge or out-of-centre locations) should be assessed.

6.121. TAN4 advises that such assessments should be considered against a range of criteria:

- The impact on existing, committed and planned public and private investment in centres.
- The impact on centre vitality and viability.
- The consideration of cumulative effects.
- The impact of the proposal on allocated sites outside centres being developed in accordance with the development plan.
- The impact on in-centre trade and turnover, taking account of current and future expenditure capacity.
- An assessment of the proportion of customers travelling by different modes of transport.
- The impact on travel patterns.
- Any significant environmental impacts.

6.122. We consider these matters below.

Investment Impacts

6.123. We are not aware of any planned investment in Lampeter or other centres that might be affected by the proposed development. In any event, the levels of impact identified in our quantitative assessment are low in absolute terms. The levels of diversion identified would not in our view deter future investment in the existing centres or undermine investor confidence in the deliverability of future investments.

6.124. Moreover, the proposal could actually be a catalyst for new development within Lampeter, as it is a sign of confidence in the town.

6.125. We therefore conclude that there are no alternative investments that would be prejudiced by the application proposal.

Vitality and Viability and In-Centre Trade/Turnover

6.126. Having regard to the conclusions of the retail impact assessment as set out above, and the nature, function, and health of the town centres' retail offer, we do not consider that the Aldi proposal would undermine the vitality or viability of Lampeter or other existing centres. Identified impacts are well within acceptable parameters and could not be considered 'significantly adverse'. Indeed, the total turnover of the town centre is projected to increase (by +6.8%) by 2026 following cumulative diversions; and the overall, forecast cumulative impact (convenience and comparison combined) is 5.9%.

6.127. The significance of impact, rather than evidence that some trade will be diverted from existing centres, is the primary consideration. In this case, our analysis indicates that the Aldi store will divert some expenditure from existing centres, but not to the extent that such impacts could be considered significantly adverse or give rise to policy conflict.

6.128. We therefore conclude that retail impact on vitality and viability is acceptable in planning policy terms, and that in-centre trade and turnover will not be materially affected by the application proposals. Impacts are also likely to be mitigated due to the locational characteristics of the development for the reasons indicated above.

Cumulative Effects

6.129. As set out above, our assessment has considered combined impacts with recent commitments for convenience goods facilities. The impact figures calculated in Tables 12 and 14 of Appendix 4 and referred to above are robust and include commitments.

6.130. We are not aware of any other material developments or unimplemented planning permissions that should be included in the cumulative assessment. We therefore conclude that the proposals do not give rise to materially significant cumulative effects.

Impact on In-Centre Trade/Expenditure Capacity

6.131. Our impact analysis confirms that impact on in-centre trade and turnover will be within commonly acceptable limits. There is partial expenditure capacity in 2026 and clear evidence of qualitative need.

Impact on Travel Patterns/Transport Modes

6.132. This is considered in more detail in the accompanying Transport Assessment. Based on survey findings (which demonstrate current, unsustainable patterns of shopping associated with zone 1) and the potential of the application proposal to retain trips and spending in Lampeter, we consider that the proposals will assist in minimising unnecessary journeys and reducing trip lengths.

Environmental Impacts

6.133. Given the nature of the application site and the information submitted in accordance with the application proposals, we do not consider that there are any significant environmental impacts associated with the proposed development.

6.134. Furthermore, as set out above, the reduction in trip lengths and reducing the need to travel will have a beneficial environmental impact due to the reduction in emissions.

Overall Conclusions of Retail Assessment

6.135. Based on the analysis in this chapter and supporting tables in Appendix 4, we conclude that the application proposal complies with the tests of 'need' and 'impact', including cumulative effects.

7. Other Material Considerations

Principle of Development

- 7.1. Paragraph 1.18 of the PPW (2021) states that legislation secures a presumption in favour of sustainable development in accordance with the development plan unless material considerations indicate otherwise to ensure that social, economic, cultural, and environmental issues are balanced and integrated.
- 7.2. The application site is located within the defined settlement limits of Lampeter as defined within the adopted LD. Policy S02 of the LDP refers to the settlement framework and states that provision for growth and development will be at sustainable locations in accordance with the LDP's settlement framework. In this respect, Lampeter is identified as an Urban Service Centres where development will be permitted.

Loss of Playing Pitch

- 7.3. Paragraph 4.5.4 of the PPW (2021) states that all playing fields whether owned by public, private or voluntary organisations, should be protected from development except where facilities can best be retained and enhanced through the redevelopment of a small part of the site.
- 7.4. Paragraph 3.5 of TAN 16 (Sport, Recreation and Open Space) and Policy LU22 (Community Provision) of the Ceredigion Local Development Plan state that the LDP will help sustain and enhance community provision by resisting the loss or change of use of an existing community provision unless the current use has ceased to be viable, and no other community use can be viably established, or it can be demonstrated that existing level of community provision is inappropriate or surplus to the community needs of that settlement or settlement group.
- 7.5. The proposal will lead to the loss of one of the two pitches at the application site.
- 7.6. Currently the two pitches are not formally used by any clubs, nor have they been for several years. Use by the local community for sports activities is very infrequent, and the two pitches have not been in use simultaneously for many years. The only current use of the site is for informal activities such as dog walking. It is therefore clear that the site is not used to its full potential and there is no demand for the current two sports pitches.
- 7.7. In relation to the wider provision in the area, higher quality rugby and football pitches are provided on North Road in Lampeter, just a ten minute walk from the application site. The facilities at North Road are well used by local clubs (including Lampeter Town RFC) and have good facilities such as on-site parking, floodlights, a modern clubhouse with changing facilities and bar, and a good below ground drainage system.
- 7.8. Additionally, Lampeter Leisure Centre, located immediately to the south-east of the application site, provides high quality sports facilities for public use which include tennis courts, an all-weather multi use playing pitch, bowling club, indoor sports hall, gym, and swimming pool. There are also three grass pitches which are regularly used for rugby and football.
- 7.9. The above two sites are used frequently by clubs, university teams, and the public due to their good quality facilities such as parking, floodlighting, or changing facilities.
- 7.10. In light of the above it is clear that there is a very good provision of sports pitches and other leisure facilities within the immediate surrounding area and serving Lampeter.
- 7.11. Finally, the proposal will actually help to encourage use of the playing pitch that will remain at the site by improving the facilities. Firstly, the access into the site will be significantly upgraded, and 22 car parking spaces will be provided in total. Secondly, the listed pavilion will undergo an internal and external refurbishment to enable it to be used by sports clubs and the local community. The pavilion will be used by clubs for changing and showering before and after matches, in addition to toilets and providing refreshments from the small kitchen. The space will also be available for use by the community when required. Finally, the proposal includes improved pedestrian access into the site from the north, as well as a new pedestrian link to the existing leisure site to the south-east. This will encourage more informal use of the remaining pitch due to improved pedestrian access, especially for walkers, runners, and dog walkers.

Economic Development

- 7.12. The proposals will be in line with PPW 11 which states that a more equal Wales can be achieved through promoting sufficient employment and enterprise opportunities for people to realise their potential and by recognising and building on the existing economic strengths of places to assist in delivering prosperity for all.
- 7.13. The site represents an excellent opportunity to deliver a multi-million-pound investment and provide beneficial economic development through the development of an Aldi discount foodstore, the refurbishment of a Grade II listed sports pavilion, the installation of three pre-fabricated wooden exhibition pods, and the associated works. a nature and biodiversity area with associated access, car parking and landscaping. This site has the potential to come forward as a discount foodstore in the short to medium term, with the benefits for the local area being realised as early as 2023 or 2024.
- 7.14. The Food Village pods will help to maintain existing jobs at local food producers and potentially create new jobs. This will be through promoting the local food industry, local sustainability, and rural enterprise. The creation of a Food Village could also attract new visitors to Lampeter which will have positive knock-on benefits for existing retailers and services in the town centre, having positive impacts on town centre vitality and viability.
- 7.15. With the sale of the land to Aldi, the University would also be in a position to invest significantly in a new food and hospitality training centre in the centre of Lampeter and a rural enterprise centre on its campus. The scheme is underpinned by economic regeneration, with the aim of creating new jobs, attracting many more visitors to the town, and increasing the number of further and higher education students studying in Lampeter.
- 7.16. The proposed Aldi food store will provide approximately 40 full and part time jobs (a full-time equivalent of 27) at a range of levels of seniority. The exhibition pods will also provide several new jobs.
- 7.17. Rates of pay at Aldi are the highest in the grocery sector. Starting hourly rates for shop floor staff are £9.55/hour which increases to £10.57 after three years' service. These rates of pay are well above the National Living Wage, and store managers can earn up to £60,000/annum.
- 7.18. These jobs will increase spending power for employees, and their wages/salary could be spent in local businesses in and around Lampeter, therefore having further economic benefits on those businesses.
- 7.19. It is Aldi's preference to recruit staff locally. The company's remuneration and training policy reflects Aldi's firm belief that a well-trained and highly motivated workforce is essential to the success of the business. All hourly paid wages for store employees exceed the Government's National Living Wage and the Living Wage Foundation's recommended national rate. Aldi offers full training for all its positions and the schedule and facets of the training are tailored to the individual.
- 7.20. Aldi has two of the most successful apprentice schemes and graduate programmes in the UK. Apprentices are trained to work in all parts of the business including at store, distribution, logistics and management level, as well as progression through to the Store Management Team.
- 7.21. Aldi's on-going graduate scheme secures an annual intake for the Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK-wide programme.
- 7.22. The construction of a new store requires the services of local building trade contractors which provides employment opportunities during the build out period. Typically a range of skills such as ground works, steel, brick and block work and shop fitting are sourced locally, as well as cleaners and labourers.
- 7.23. The proposal also accords with Paragraph. 5.4.13 of PPW as it will:
- Reduce the need to travel and reduce dependency on the car;
 - Deliver physical regeneration and employment opportunities;
 - Ensure that residents of existing and new communities have access to jobs.

- 7.24. On this basis, it is considered that the development of the site for retail uses would have significant positive economic impacts and would therefore support the broader economic and regeneration objectives of the Local Development Plan and PPW.

Design and Layout

- 7.25. Paragraph 3.3 of PPW states that *“Good design is fundamental to creating sustainable places where people want to live, work and socialise. Design is not just about the architecture of a building but the relationship between all elements of the natural and built environment and between people and places. To achieve sustainable development, design must go beyond aesthetics and include the social, economic, environmental, cultural aspects of the development, including how space is used, how buildings and the public realm support this use, as well as its construction, operation, management, and its relationship with the surroundings area.”*
- 7.26. The development boasts high-quality design and creates a strong sense of place through drawing on the local context and being complementary to its surroundings, which is the criteria set out in the Local Plan.
- 7.27. Careful consideration has been given to the scale and massing of the proposal, which has been informed by the existing site’s layout, the site’s context, and existing features. The operational and servicing requirements of the store were also an important factor informing the final design proposals.
- 7.28. The proposal has been sited and designed so it complements its surroundings and doesn’t create any significant adverse impacts on sensitive features. In this case, the listed pavilion and the boundary wall and gates are the main consideration. The siting of the proposed Aldi store on the eastern boundary of the site has been designed to retain lines of the site of the pavilion from Pontfaen Road. The Aldi store is also of a single storey, low profile design, so visual impact is kept to a minimum as it is not ‘overbearing’ on the setting of the listed building. This is assessed in more detail within the ‘Heritage and Archaeology’ sub-section below.
- 7.29. The design of the Aldi building uses local and natural materials to create a building that complements its surroundings. For example, the timber and white render compliments the existing appearance of the pavilion, and the stonework appropriately reflects much of the architecture in Lampeter such as the churches and chapels.
- 7.30. The materials selected for the ‘Food Village’ compliment the foodstore and tie in with the recently completed Enterprise Centre opposite the site. The form of the prefabricated pods have taken inspiration from the protecting gables of the pavilion. The pods aim to provide attractive and functional spaces whilst not having a negative impact on the setting of the listed building. Due to the relatively open nature of the site, the use of curved or organic structures was avoided as it was considered this type of architecture is more suited to a wooded or enclosed location.
- 7.31. On this basis, it is considered that the design of the development proposals are considered acceptable and sustainable. We therefore consider that the proposal is in compliance with the key national and local planning policy set out in PPW and the Local Development Plan.

Heritage and Archaeology

- 7.32. A Heritage Impact Assessment (‘HIA’), produced by Heritage Recording Services Wales (‘HRS’), forms part of this planning application. The HIA assesses the direct impacts of the works to the pavilion, in addition to the indirect impacts on the setting of the pavilion. It also refers to potential for archaeologically important artefacts at the site.
- 7.33. The HIA first establishes that within the application site, there are several potentially sensitive elements. The Grade II listed pavilion is identified as such, together with other elements within the site’s curtilage such as the stone wall and iron railings and gate along the northern boundary. Additionally, the actual sport pitches could have some historical important given the game of rugby was first played in Lampeter, although not on this site.
- 7.34. The HIA then assesses the impact that the proposed development has on the site. It states any impacts should be minimised where possible through site design. Any impacts will need to be mitigated against unless there are other clear benefits of the proposal that outweigh the harm.
- 7.35. In respect of the sports pavilion, the assessment concludes that the direct physical effect of the proposed development on its exterior will be beneficial given that the building is in a poor state of repair. Regarding the interior of the building, the assessment has predicted that the proposed alterations and refurbishments will have a ‘minor’ magnitude of effect and a ‘moderate/minor’ significance of effect. However, given the present condition of the pavilion, the proposals are not considered to be contentious, and any repairs or changes

will have significant positive benefits. However, it is important that these internal changes will need to be sympathetic and in character with the architecture of the building.

- 7.36. In order to mitigate against any predicted direct effects on the building, it is advised that an archaeological building investigation and recording (ABIR) program is undertaken to at least Level 2 in order to make a lasting record of the interior and exterior of the building prior to any alterations and repairs. This can be secured by a planning condition on a decision notice in the event planning permission and listed building consent are granted.
- 7.37. In relation to the indirect impacts on the pavilion (i.e. its setting), the assessment has predicted that the proposed development will cause some adverse impacts, which are classed as of a 'major' magnitude and of 'major' significance. In terms of mitigation to reduce these predicted effects, the proposed development proposes to restore and improve the sports pavilion which will have significant positive effects on the building, and will also help to bring the remaining pitch back into regular use. The proposals will undoubtedly offer significant positive benefits to the pavilion and its setting and will enhance and benefit the site as a whole and add to an appreciation of the building and its setting. As such the magnitude of effect and significance of effect will be reduced. These positive impacts are sufficient to outweigh any negative impacts.
- 7.38. The assessment also considered impacts upon the playing field and the wall and gates along the northern boundary. The HIA concludes given the above considerations and proposals, it is predicted that the proposed direct impact on the northern boundary of the playing field would be of minor magnitude and therefore of only moderate/minor significance.
- 7.39. Other designated sites potentially affected by the proposal include a number of other Grade II Listed buildings positioned east of the playing field and within the Lampeter Conservation Area. However, the assessment has concluded that none of these listed buildings, including the Lampeter Conservation Area, will be affected to any significant degree and any potential effect will be reduced over time with intervening vegetation.
- 7.40. In respect of archaeological matters, the HIA also concluded that there are a number of potentially buried archaeological sites and features relevant to the history of the playing field and possibly earlier when it was a field alone, that could be disturbed by any groundwork as part of the proposed development. As such it is advised that any penetrative groundwork is undertaken under archaeological supervision in the form of a watching brief.
- 7.41. In light of the above, although the proposal will cause some adverse impacts upon the listed building and its setting, it is considered that the design of the development proposals should be considered acceptable, due to the wider benefits and careful design of the proposal.
- 7.42. We therefore consider that the proposal is in compliance with the key national and local planning policies set out in PPW and the Local Development Plan.

Flooding and Drainage

- 7.43. Submitted as part of this application is a Flood Consequences Statement and Drainage Strategy undertaken by Craddys, which should be read in conjunction with this Statement. The objective of this report is to develop and assess drainage solutions and flood risk for the proposed development, such that these meet the requirements of the TAN 15 and PPW.
- 7.44. According to Natural Resources Wales's (NRW) online Flood Map for Planning (FMP), the site is located predominately within Flood Zone 1, defined as having less than 1 in 1000 (0.1%) chance of flooding in a given year, including climate change. Parts of the site are located within Flood Zones 2 and 3, shown to be at relatively high risk of flood from rivers.
- 7.45. The area shown to be at risk of flooding from rivers, the western part of the site, is to remain as a grassed sports pitch. However the proposed development areas of the Aldi store, car park and service yard as well as the Food Village are all located within Flood Zone 1.
- 7.46. TAN 15 Figure 1 gives the flood risk requirements for proposed developments in Zone 1, whereby the justification test is not applicable and there is no need to consider flood risk further, beyond a requirement to not worsen flood risk elsewhere.
- 7.47. This development is deemed appropriate in this location, is at minimal risk of flooding and its undertaking will not increase the risk of flooding to the neighbouring area.

- 7.48. The disposal of surface water generated by the development is proposed to be via infiltration into the ground. BRE 365 soil percolation testing has been undertaken with the site investigation, this found drainage conditions to be good with underlying silty, gravely sand and sandy clay. The groundwater was found to be at sufficient depth beneath the site to allow for a combination of near surface (e.g., permeable paving) and below ground (e.g., soakaways) infiltration features. It is currently anticipated that all surface water generated by the proposed development will be disposed of to ground. The surface water drainage design for the Aldi site is to be agreed under the SAB approval process.
- 7.49. It is proposed to discharge the foul water from the proposed Aldi store development to the existing DCWW foul sewerage network.
- 7.50. We therefore consider that the proposal is in compliance with the key national and local planning policy set out in PPW, TAN 15, and the Local Development Plan.

Landscaping and Trees

- 7.51. A Soft Landscaping Proposals Plan, Landscape Management Plan (LMP) and Arboricultural Assessment have been prepared by Tyler Grange, and have been submitted with this application.
- 7.52. The purpose of the Landscape Management Plan is to provide details of measures to ensure the successful establishment and ongoing maintenance of the soft landscape elements of the development proposals. The Landscape Management Plan should be read in conjunction with the Soft Landscaping Proposals ref. 13550_P13 and 13550_P14.
- 7.53. Soft landscaping within the site is designed to create an attractive and appropriate setting for the Aldi store, providing year-round interest and colour, and introduce a strong soft landscape framework with planting throughout the site including trees, selected to maximise biodiversity and aesthetic value.
- 7.54. Within the development, 26 new trees are proposed. The selection of native species and trees of upright form will minimise future requirements for pruning. The planting size, pattern and spacing of new trees will give a stronger visual effect and will result in well-formed specimens within the urban context, without detriment to pedestrian and vehicle safety.
- 7.55. A native hedge is proposed to the eastern boundary which will provide some softening to the built environment and habitat for wildlife. The species selection for the native hedgerow will include *Acer Campestre*, *Crataegus monogyna*, *Corylus avellana* and *Ilex aquifolium*.
- 7.56. A grass meadow mixture (Emorsgate EP1) is proposed for its ecological value in the rain garden areas and grass areas to the rear of the store.
- 7.57. The ground around the proposed planting will be bark mulched to conserve moisture and reduce weed growth. Soil additives are to be incorporated into the topsoil to all newly planting areas to provide a suitable growing medium. Proposed trees with root balls are to be planted with double stakes and ties to provide anchorage.
- 7.58. The Arboricultural Impact Assessment assesses the quality of the trees at the application site and advises on methods to protect trees to be retained. It concludes that the two trees being lost (T4 and T5) in addition to the loss of 35m of hedgerow can be compensated by the extensive planting scheme proposed within the application, which includes 26 extra heavy standard trees and 529 native hedgerow specimens.
- 7.59. We therefore consider that the proposal is in compliance with the key national and local planning policy set out in the PPW and the Local Plan.

Landscape and Visual Appraisal

- 7.60. Submitted as part of this application is a Landscape and Visual Appraisal (LVA) prepared by Tyler Grange, which should be read in conjunction with this Statement.
- 7.61. When considering the landscape and visual implications of development, it is important to recognise that any change to a greenfield site will ultimately result in landscape and visual effects. However, the extent of the effects should be considered within the local context and their proposals degree of conformance with their surroundings, as well as the social, economic, and environmental balance.

- 7.62. The landscape assessment shows how the scheme has taken a holistic route to development, with the inclusion of swales, wildflower meadows, wildlife ponds, recreation provision, tree management, new planting, and hedgerow enhancements which all collectively add to the diversity and enrichment over the existing baseline situation.
- 7.63. In general, the proposed development benefits from good visual containment. This is then heightened when married with the new landscape proposals and subsequent management that benefits both the visual environment and the landscape character. The LVA demonstrates that visual effects will be localised and limited to those views close to the site. The proposals provide a good contextual fit with the character of the area and provide a net gain in tree canopy cover.
- 7.64. In terms of local planning policy, policies DM17, DM18 and DM19 alongside the Special Landscape Area SPD, all recognise the character and cultural value of the area. The LVA also recognises this importance and acknowledges the constraints. Through an appropriate design response that limits the effects of built development and provides enhancements to the existing land use and features of importance, this LVA concludes that the proposals are in accordance with planning policy.
- 7.65. The improvement and enhancement of green infrastructure over and above the existing baseline demonstrates the delivery of a multifunctional green infrastructure strategy, with the enhancement measures as set out in the Landscape Strategy. This provides accessibility, legibility and other social and economic benefits that would improve the health and well-being of the local community.
- 7.66. Finally, the LVA has shown that the issues in relation to landscape and visual matters have been mitigated against using the siting of the built form and the inclusion of the proposed soft landscaping. This report concludes that there are no issues arising with regard to landscape and visual matters which would undermine the feasibility of the scheme.
- 7.67. We therefore consider that the proposal is in compliance with the key national and local planning policy set out in PPW and the Local Development Plan.

Ecology

- 7.68. Submitted as part of this application is an Ecological Assessment undertaken by Tyler Grange, which should be read in conjunction with this Statement.
- 7.69. The site is not covered by or adjacent to any statutorily or non-statutorily designated sites, although a number of such sites are present within the potential Zone of Influence of the development. This includes the River Teifi Special Area of Conservation (SAC) which is connected to the site by a watercourse which is located adjacent to the western boundary of the site. The proposals will include measures to ensure no contaminated run-off can enter the watercourse both through the construction and operational phase of the development. This would be through the adoption and implementation of a Construction Ecological Management Plan (CEMP) and through the design of the SuDS.
- 7.70. The site currently has limited potential to support protected and notable species specifically roosting/foraging bats and nesting/foraging birds. A bat emergence survey would be completed on the pavilion to ensure no roosts would be impacted by the restoration works to this structure. This would be completed in the 2022 survey season with the results submitted as an Addendum prior to determination of this application. Should a roost be present then, depending on the potential for effects, works would be either covered by a NRW Bat Mitigation Licence or a Precautionary Working Method Statement to ensure that no breach in legislation occurs.
- 7.71. The proposals seek to retain and protect the hedgerows and trees which are the habitats of highest ecological importance. New native hedgerow and tree planting will be provided along with ornamental shrub which will ensure the scheme provides new habitats of value for bats, birds and invertebrates. In addition, the provision of bat and bird boxes would provide ecological enhancements at the site, leading to biodiversity gains and improved opportunities for UK and local Priority Species.
- 7.72. A Landscape and Ecological Management Plan (LEMP) would ensure retained and created habitats are managed favourably to maximise their benefit to wildlife and to provide continued opportunities for the species which could utilise the site.
- 7.73. With the implementation of the recommended mitigation and enhancement strategy described, the proposed development would be in conformity with relevant planning policy and legislation. The strategy could be controlled by appropriately worded planning conditions.
- 7.74. We therefore consider that the proposal is in compliance with the relevant national and local planning policies set out in PPW and the Local Development Plan.

Shadow Habitats Regulations Assessment

- 7.75. A Shadow Habitats Regulations Assessment has also been undertaken by Tyler Grange. The primary purpose of this is to assess whether the proposed development will lead to an increase in phosphate levels which could adversely affect the River Teifi SAC.
- 7.76. NRW has recently published evidence outlining the increased phosphate levels for several river SACs across Wales, including the River Teifi SAC. It concluded that all proposed developments must be assessed for the potential to cause a likely significant effect ('LSE') as a result of increased phosphate discharge into the Teifi catchment.
- 7.77. The document concludes that there will be no net increase in foul water as the population within the catchment is not increasing, It is therefore considered the proposal will not result in increased phosphates in the River Teifi SAC, and that it will not result in a LSE in the SAC.
- 7.78. We therefore consider that the proposal is in compliance with the key national and local planning policy set out in PPW and the Local Development Plan.

Highways and Access

- 7.79. A Transport Assessment (TA) has been produced by Entran Limited, which accompanies this application.
- 7.80. The information in the TA has been presented to help the local authority review the likely effects of the development on the surrounding transportation network.
- 7.81. An operational assessment has been undertaken of the proposed site access at expected peak times and this has shown that there should not lead be any issues expected and the development would not lead to significant nor severe effects on the local highway network.
- 7.82. Personal injury accident data has been examined on the local highways and there has been no accidents recorded in the vicinity of the site access. The addition of the modest amount of development traffic is considered unlikely to introduce or lead to any new material road safety issues.
- 7.83. Additionally, offsite highway infrastructure as part of the build process would be included to enhance non-motorised user access to the site and connectivity to the town centre and surrounding area, to support Active Travel Wales objectives.
- 7.84. Based on these findings, the development proposals are not expected to lead to any material highways issues on the local transportation network. The provision of the proposed development offers a good opportunity to enhance the local area and should be supported by the local highway authority.
- 7.85. The submitted TA therefore demonstrates that the proposals are consistent with local policy and the site access has been designed to provide safe and efficient access, for all modes of transport.
- 7.86. A Staff Travel Plan and a Transport Implementation Strategy have also been submitted with this application, which provides the opportunity to reduce dependence on travel by private car and seeks to influence travel to and from the site rather than merely assessing its impact.
- 7.87. It is therefore concluded that the impact has been fairly and reasonably addressed and there should be no reason for highways related objection to the proposed development.
- 7.88. We therefore consider that the proposal is in compliance with the key national and local planning policy set out in PPW and the Local Development Plan.

Contamination

- 7.89. A Geo-Environmental Appraisal of the application site has been prepared by Groundtech Consulting. This reviews previous uses of the site and advises on the likelihood of contamination.
- 7.90. The site has generally remained undeveloped and has more recently been used as a sports field. A small building was present in the north west corner of the site.
- 7.91. The site is not affected by a legacy of coal mining.

7.92. The following further work is considered necessary to progress the site to construction phase:

- Completion of gas monitoring programme and issue gas assessment.
- Site-specific radon search to determine the level of radon measures to be included within the proposed development.
- Detailed foundation design.
- Confirmation of the recommendations made within this report with the Local Authority

7.93. We therefore consider that the proposal is in compliance with the key national and local planning policy set out in PPW and the Local Development Plan.

Lighting

7.94. External lighting has been designed to reduce any detrimental effects of light pollution, and a lighting plan (prepared by BMT) has been submitted with the application.

7.95. On this basis, it is considered that the impact of the development proposals on the amenity of the surrounding area will be acceptable and should be considered acceptable. We therefore consider that the proposal is in compliance with the key national and local planning policy set out in the NPPF and the Local Plan.

Construction and Environmental Management Plan (CEMP)

7.96. Submitted as part of this application is a Construction and Environmental Management Plan (CEMP), which should be read in conjunction with this Statement. The report considers and provides methods to ensure the disruption to adjacent site occupiers and road users are minimised.

7.97. The document sets out the programme of works, construction traffic management plan materials and resource use, the proposed construction methodology, and environmental impacts. The document also sets out public relations information and tree protection.

7.98. We therefore consider that the proposal is in compliance with the key national and local planning policy set out in PPW and the Local Plan.

8. Summary and Conclusions

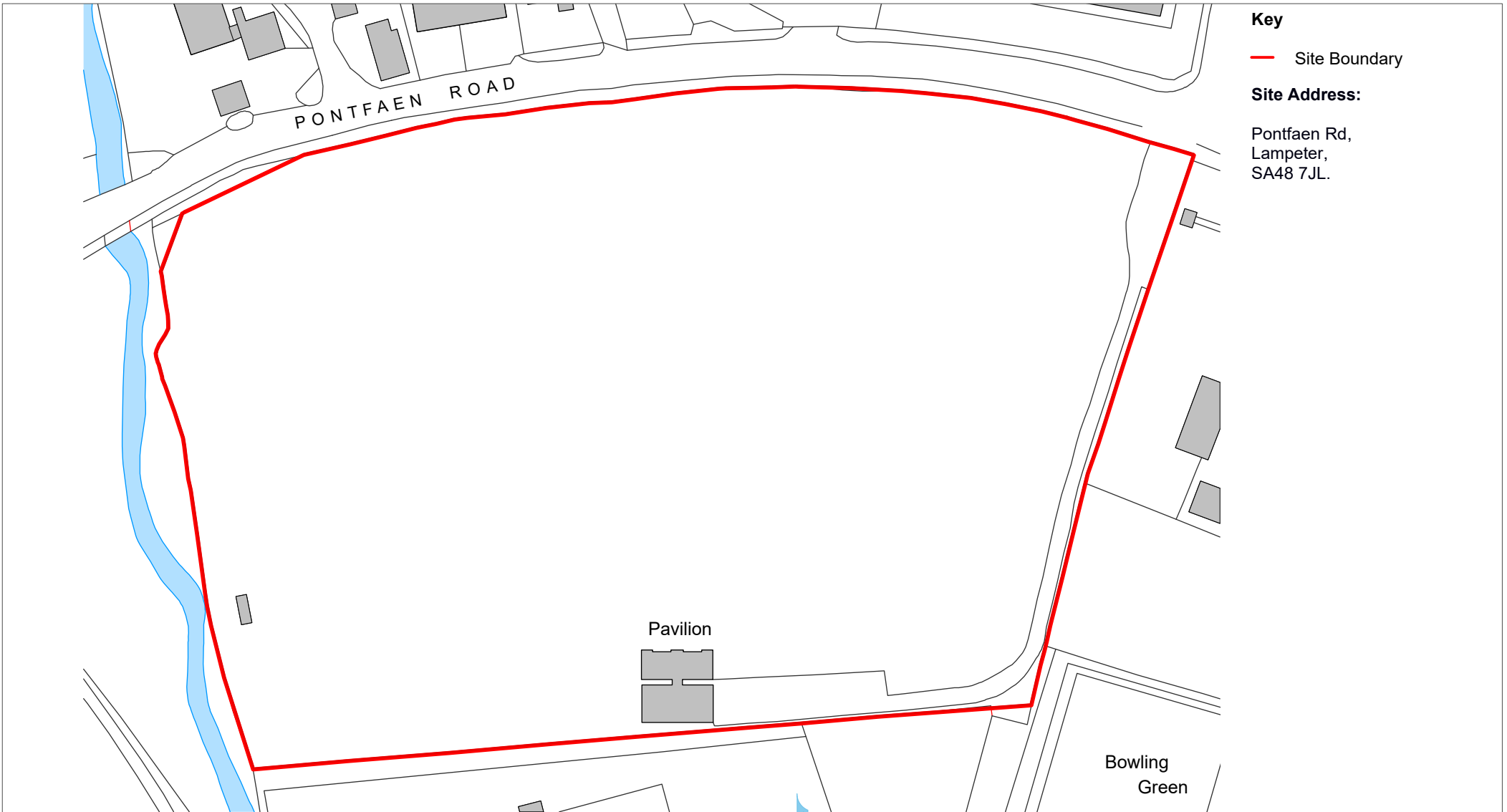
- 8.1. This Planning and Retail Statement is submitted by Planning Potential, on behalf of Aldi Stores Limited (Aldi) and University of Wales Trinity Saint David ('UWTSD'), in support of a full Planning and Listed Building Consent application for the erection of a Class A1 retail Aldi foodstore, the refurbishment of a Grade II listed sports pavilion, the installation of three pre-fabricated wooden exhibition pods, and a nature and biodiversity area with associated access, car parking and landscaping at Trinity Saint David's playing Fields at Pontfaen Road in Lampeter.
- 8.2. This Statement addresses all of the relevant planning policy considerations associated with the proposed development but should be read in conjunction with other documents and drawings submitted in support of this application.
- 8.3. The proposed store will measure 1,855 sq. m (GIA), and have a net sales area of 1,315 sq. m. The car park will have 118 spaces, including five disabled spaces, seven parent and child spaces, and 24 spaces for electric vehicles (four live, and a further 20 with passive provision).
- 8.4. The proposed store will create up to 40 part time and full time new job positions (a full time equivalent of 27). These jobs will be at a range of levels of seniority, and will be at sector leading pay rates. Short term jobs will also be created through the construction process.
- 8.5. In summary, the benefits of the proposal are:
- The RIA confirms that there is a clear quantitative need for a new foodstore in Lampeter.
 - There are clear qualitative benefits of a new store in this location, including:
 - Addressing a clear deficiency in convenience floorspace in Lampeter;
 - Providing healthy competition for existing local convenience retailers;
 - Helping to 'clawback' convenience expenditure which is being lost to locations such as Carmarthen and Cardigan. Retaining expenditure locally will have clear benefits for existing retailers and other businesses in Lampeter; and
 - Helping to reduce the need to travel which has sustainability benefits.
 - Our impact assessment demonstrates that there will not be any significant adverse impacts upon any defined centres. Conversely, the proposal could actually help to improve the level of footfall and therefore trade in Lampeter town centre, which would help its overall level of vitality and viability.
 - There are no sequentially preferable sites on which the proposed development could be accommodated.
 - The proposal will refurbish a Grade II listed pavilion which is currently in a poor state of repair. Its refurbishment will help to promote use of the sports pitch which will remain at the site.
 - The design of the site has been carefully considered to ensure any impacts upon the setting of the listed pavilion or its curtilage is minimised. The benefits of the proposal are considered to outweigh any adverse impacts.
 - The Food Village element will help to promote local and artisanal food producers
 - The overall development will create short term and long term jobs at a time when the effects of Covid-19 are still being felt.
 - There are no other technical considerations which would prevent the granting of planning permission.
- 8.6. On the basis of the consideration of the proposals set out in this Statement (and other supporting documents), we consider that the application proposals represent appropriate development and comply with relevant planning policy at all levels.
- 8.7. We therefore consider that when assessed against relevant planning policy, the 'presumption in favour of sustainable development' applies and the planning application should be granted permission.

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Appendix 1

Site Location Plan

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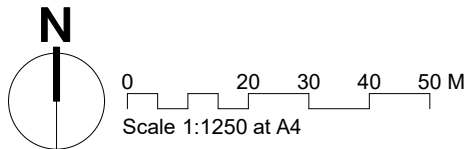
Key

— Site Boundary

Site Address:

Pontfaen Rd,
Lampeter,
SA48 7JL.

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Project
Aldi Lampeter, Pontfaen Road

Client
Aldi Stores Ltd

Scale Paper Size Filename
1:1250 ISO A4 190866 SITE MASTER.vwx
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P1	28/09/21	JKCJS	Drawing Issue
Rev	Date	By	Ap Note

Drawing Title
Site Location Plan

Project Number	Drawing Number	Revision
190866-1000		P1

Date	Drawn	Checked	Purpose/Status
28/09/2021	JKC	JS	PLANNING

Check all dimensions and levels on site

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Appendix 2

Proposed Site Plan

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DRAWING LEGEND

- Application Boundary
- TM Denotes tarmac finish
- BP Denotes block paving
- CC Denotes concrete surface finish
- CS Denotes concrete paving slab finish
- SL Denotes landscaped area with misc planting within application area
- GT Denotes ACO GroundGuard ground reinforcement grid tiles filled with gravel
- RH Denotes rolled hoggin self-binding gravel
- TKR — Timber knee rail
- TPR — Timber post and rail fence (1.2m high)
- CBF — Close boarded fence (1.8m high)
- PF — Paladin fence (2.4m high)
- HOB ● Heavy duty bollards
- New stainless steel anti ram bollards
- LC Lighting Column
- CC Denotes Click & Collect spaces
- EV Electric vehicle charging point
- EV Provision for future electric vehicle charging point

PROPOSED ALDI PARKING: 118 no.

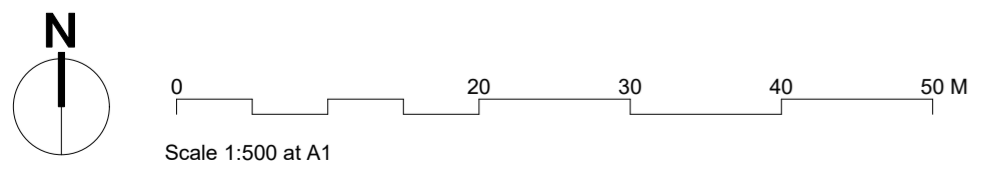
- 100no. Standard spaces
- 7no. P&C spaces
- 5no. Disabled spaces
- 4no. EVCP spaces (1x20 future spaces)
- 2no. Click & Collect spaces

FOOD VILLAGE PARKING: 25 no.

PAVILION PARKING: 22no.

- 12no. Existing spaces
- 10no. Overflow

DRAWING BASED ON TOPOGRAPHICAL SURVEY UNDERTAKEN BY BERRY GEOMATIC SURVEYS, DRAWING NUMBER 46/20, DATED 01/07/20.



Kendall Kingscott

Project: Aldi Lampeter, Pontfaen Road
 Client: Aldi Stores Ltd

Scale: 1:500
 Paper Size: ISO A1
 Filename: 190866 SITE MASTER.vwx

Rev	Date	By	Ap	Note
P1	28/09/21	JKCJS		Updated junction plan. Notes added. Pedestrian access routes updated.
P2	03/11/2021	DM JS		Updated junction plan. Notes added. Pedestrian access routes updated.

Drawing Title: **Proposed Site Plan**

Project Number	Drawing Number	Revision
190866-1300	P2	

Date: 28/09/2021
 Drawn: JK
 Checked: JS
 Purpose/Status: **PLANNING**

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Appendix 3

Sequential Assessment

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Sequential Assessment



- 1.1. The Primary Catchment Area (PCA) adopted for our sequential site exercise is focused on Lampeter and its surrounding rural area.
- 1.2. This has been the focus of Aldi's site search. However, in line with the town centre first approach advocated by TAN4, regard has been given to the retail hierarchy outlined in the LDP and in national guidance and summarised in Section 3.
- 1.3. We have focussed the sequential assessment on the following areas:
 - Lampeter town centre;
 - Tregaron town centre;
 - Aberaeron town centre;
 - Llandysul town centre;
- 1.4. The following section considers these centres and their surrounds in the context of the sequential approach.
- 1.5. Centres further away, such as Newcastle Emlyn, Cardigan, Carmarthen or Aberystwyth, are not considered suitable locations due to the different geographic catchment a store in those centres would serve. These centres would not achieve the objectives that opening a store in Lampeter would realise.

Assessment of Alternative Sites

Lampeter Town Centre

Sites and Units within Town Centre Boundary

- 1.6. The town centre boundary of Lampeter is quite a small area and comprises the area centred around Harford Square and includes College Street (up to the junction with Bryn Road/Station Terrace), High Street (from roughly numbers 33 and 17 to the west), and Bridge Street (down to number 25 to the south). It also includes the Sainsbury's on Market Street, and the Cwmmins car park on Peterwell Terrace.
- 1.7. Following a full review of the centre in October 2021, due to the constrained and developed nature of the town centre, there are no allocated development sites, or other sites which could be redeveloped to accommodate the proposal.
- 1.8. The only site possibly large enough to accommodate the proposed Aldi store would be the Cwmmins car park site on Peterwell Terrace. However, this site is still very small, measuring 0.32 ha, and is of a long and narrow configuration. It would therefore not be suitable to develop a supermarket on this site. Furthermore, the site is a well-used car park and therefore an important facility for the town centre. Its redevelopment is therefore highly unlikely and is not currently considered available. We conclude that the site would not be a suitable alternative to the application site.
- 1.9. It would not be viable to construct the Food Village on an alternative site as a separate, standalone element. The investment in the site by Aldi is enabling the Food Village concept to be developed and so they are required to be on the same site. Furthermore, the Food Village will link in with Aldi where possible, as Aldi has established a Welsh Buying Department.
- 1.10. Additionally, accommodating the Food Village pods within town centre units would not allow for flexible leases. Any occupiers of the pod units would need to sign up to long leases in a traditional town centre unit which is not feasible or viable to meet the purpose of this proposal. Finally, if the occupiers were accommodated in several separate units across the town centre, there would be no 'Food Village' element. Creating a Food Village as proposed would allow the site to be marketed as such and it creates a focal point whereby local produce can be promoted. This objective would not be achieved dispersed across multiple sites in the town centre.
- 1.11. For completeness, I have reviewed vacant units within Lampeter town centre. As confirmed in the October 2021 site visit, there are 14 vacant units within Lampeter. For clarity, this number relates to the vacant units on the Goad plan, which does include a wider

area than the defined town centre boundary. The number of vacant units within the defined town centre boundary is 11. These 11 units are listed below in Table 5.1 and commentary is provided.

Table 5.1

Address	Size (sq. m)	Comments
34-35 High Street	410	Too small for an Aldi store, with insufficient servicing access.
10 College Street	90	Too small for an Aldi store, with insufficient servicing access.
Vacant unit on Market Street (adjacent to dental surgery)	60	Too small for an Aldi store, with insufficient servicing access.
10 Harford Square (adjacent to Boots Pharmacy)	170	Too small for an Aldi store, with insufficient servicing access.
17 Harford Square	30	Too small for an Aldi store, with insufficient servicing access.
18 Harford Square	90	Too small for an Aldi store, with insufficient servicing access.
19 Harford Square	40	Too small for an Aldi store, with insufficient servicing access.
13 Drovers Road	30	Too small for an Aldi store, with insufficient servicing access.
16 Bridge Street	40	Too small for an Aldi store, with insufficient servicing access.
17 Bridge Street	140	Too small for an Aldi store, with insufficient servicing access.
19 Bridge Street	150	Too small for an Aldi store, with insufficient servicing access. The building would require significant external changes to become suitable for a retail use.

- 1.12. It is clear from the above tables that none of the vacant units could accommodate an Aldi store due to their small size. They also have insufficient servicing access to enable Aldi to deliver goods, and several are located in very low footfall locations.
- 1.13. It would not be viable to construct the Food Village on an alternative site as a separate, standalone element. The investment in the site by Aldi is enabling the Food Village concept to be developed and so they are required to be on the same site. Furthermore, the Food Village will link in with Aldi where possible, as Aldi has established a Welsh Buying Department.
- 1.14. Additionally, if the occupiers were accommodated in several separate units across the town centre, there would be no 'Food Village' element. Creating a Food Village as proposed would allow the site to be marketed as such and it creates a focal point whereby local produce can be promoted. This objective would not be achieved dispersed across multiple sites in the town centre
- 1.15. As stated previously, there would also be issues of funding: the creation of the concept is reliant on the capital investment in the application site by Aldi.

- 1.16. Additionally, the major advantage of the Food Village is that short term and flexible leases would be granted to local producers. This would not be possible if a producer was to occupy an existing town centre unit, as they would be tied into a long lease which would not be viable.
- 1.17. In conclusion, there are no sites or vacant units within the town centre which could accommodate either the Aldi or Food Village elements of the proposal.

Sites on the Edge of Lampeter Town Centre

- 1.18. In terms of edge of centre sites, there are three vacant units, which are listed on the Goad plan, but are outside of the defined town centre. This are listed in Table 5.2 below.

Table 5.2

Address	Size (sq. m)	Comments
Vacant unit to the east of Mount Walk	260	Too small to accommodate an Aldi foodstore, with poor servicing access. Extremely low footfall.
85 Bridge Street	70	Too small to accommodate an Aldi foodstore, with poor servicing access.
Vacant unit, Station Terrace	130	Too small to accommodate an Aldi foodstore, with poor servicing access. Extremely low footfall.

- 1.19. For the same reasons as stated for the units within the town centre, these units are also not suitable for either Aldi or Food Village elements of the proposal.
- 1.20. In light of the above, there are no available sites or units in edge of centre locations which are preferable over the application site for the proposed development.

Sites Outside of Lampeter Town Centre

- 1.21. We are not aware of any out of centre locations around Lampeter which would be suitable and available to accommodate the proposed development.
- 1.22. Furthermore, as the application site is located in an edge of centre location, it is not strictly necessary to analyse such locations.
- 1.23. In conclusion, there are no available or suitable out of centre sites around Lampeter which could accommodate the proposed development.

Tregaron Town Centre

- 1.24. Tregaron town centre, as defined by the LDP Proposals Map is very small, and focussed around St Caron's Church. It also includes parts of Station Road, Dewi Road, Chapel Street, as well as the Town Car Park.
- 1.25. There are no allocated sites or obvious development sites within or on the edge of the town centre.
- 1.26. In respect of vacant units, similarly, there are no obvious vacancies within or on the edge of the town centre boundary. Due to the nature of the nature, any vacant units will be of a very small size, and so not suitable to accommodate a proposed Aldi store.
- 1.27. Furthermore, Tregaron is a much smaller town than Lampeter and caters predominantly for a much more local catchment, and so would not have the same level of draw as the application site.

1.28. In respect of the proposed Food Village pod units, these could not be accommodated here. Firstly, there are no obvious available vacant units in which they could be accommodated. Secondly, the units need to be situated in Lampeter close to the UWTSO campus so the occupiers can benefit from academic research associated with the food industry, such as Food Centre Wales and Horeb.

1.29. In light of the above, there are no sequentially preferable sites within or on the edge of Tregaron town centre.

Aberaeron Town Centre

1.30. Aberaeron Town Centre is centred around Sgwar Alban and includes parts of Bridge Street, Castle Lane, Cadwgan Place, and Market Street.

1.31. There are no allocated sites or obvious development sites within or on the edge of the town centre.

1.32. In respect of vacant units, similarly, there are no obvious vacancies within or on the edge of the town centre boundary. Due to the nature of the nature, any vacant units will be of a very small size, and so not suitable to accommodate a proposed Aldi store.

1.33. Furthermore, Aberaeron is a much smaller town than Lampeter and caters predominantly for a much more local catchment, and so would not have the same level of draw as the application site.

1.34. In respect of the proposed Food Village pod units, these could not be accommodated here. Firstly, there are no obvious available vacant units in which they could be accommodated. Secondly, the units need to be situated in Lampeter close to the UWTSO campus so the occupiers can benefit from academic research associated with the food industry, such as Food Centre Wales and Horeb.

1.35. In light of the above, there are no sequentially preferable sites within or on the edge of Aberaeron town centre.

Llandysul Town Centre

1.36. Llandysul town centre is a small centre and the boundary comprises the northern-most part of Lincoln Street, the southern end of King Street, Lon Wesley, some of Charles Street, and the car park on Church Street.

1.37. There are no allocated sites or obvious development sites within or on the edge of the town centre.

1.38. In respect of vacant units, there are no obvious vacancies within or on the edge of the town centre boundary. Due to the nature of the nature, any vacant units will be of a very small size, and so not suitable to accommodate a proposed Aldi store.

1.39. Furthermore, Llandysul is a much smaller town than Lampeter and caters predominantly for a much more local catchment, and so would not have the same level of draw as the application site.

1.40. In respect of the proposed Food Village pod units, these could not be accommodated here. Firstly, there are no obvious available vacant units in which they could be accommodated. Secondly, the units need to be situated in Lampeter close to the UWTSO campus so the occupiers can benefit from academic research associated with the food industry, such as Food Centre Wales and Horeb.

1.41. In light of the above, there are no sequentially preferable sites within or on the edge of Llandysul town centre.

Smaller Rural Service Centres

1.42. There are a number of very small local centres ('rural service centres') located in the rural areas surrounding Lampeter, including Llanybydder and Felinfach. These are very small centres, comprising of typically approximately ten or fewer units, with minimal parking available, which perform a highly localised, 'top-up' retail function.

1.43. Given their very small size, there are no sites within these centres which could accommodate a store the size of the proposed development.

1.44. Additionally, for the reasons given above, they would also not be suitable to accommodate the proposed Food Village.

Sequential Assessment Conclusions

1.45. On the basis of the above information, we conclude that there are no alternative sequentially preferable sites within the town centre or in edge-of-centre locations elsewhere within the primary catchment area.

- 1.46. The proposed development site is considered to represent the only site that is suitable, viable and available for the type of development proposed. We therefore conclude that the site complies with the sequential approach to site selection and in particular paragraphs 4.3.18 to 4.3.24 of PPW.

DRAFT

Appendix 4

Retail Impact Assessment Tables

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Aldi, Pontfaen Road, Lampeter

Table 1. Population

Year	Zones					Total
	1	2	3	4	5	
2019	31,327	32,936	25,316	19,068	4,640	113,287
2020	31,181	32,594	25,324	18,999	4,651	112,749
2021	31,044	32,387	25,390	18,952	4,664	112,437
2022	30,869	32,077	25,392	18,865	4,670	111,873
2023	30,712	31,856	25,378	18,751	4,667	111,364
2024	30,536	31,657	25,370	18,695	4,663	110,921
2025	30,404	31,471	25,342	18,643	4,663	110,523
2026	30,289	31,275	25,326	18,594	4,663	110,147
Change 2021-2026 (No.)	-755	-1,112	-64	-358	-1	-2,290
Change 2021-2026 (%)	-2.4%	-3.4%	-0.3%	-1.9%	0.0%	-2.0%

Notes

1. Population data by Zone obtained from 'Precisely' Population and Expenditure Report commissioned by Planning Potential (PP) (May 2021).
2. Populations correspond with Zones defined for the purposes of the NEMS Household Survey (March 2021).
3. Population projections by Zone provided by 'Precisely'.

Aldi, Pontfaen Road, Lampeter

Table 2. Convenience Goods Expenditure (Per capita) by Zone

Year	Zones				
	1	2	3	4	5
2019 (£)	£2,024	£1,702	£1,945	£2,152	£1,976
2021 (£)	£1,971	£1,670	£1,872	£2,090	£1,897
2026 (£)	£2,113	£1,810	£1,962	£2,228	£1,985
Change 2021-2026 (£)	£142	£139	£91	£138	£88

Notes

1. Per capita convenience goods expenditure per Zone (2019, 2021 and 2026) has been provided by Precisely (Population and Expenditure Report, May 2021).
2. 2019 Prices.

Aldi, Pontfaen Road, Lampeter

Table 3. Total Convenience Goods Expenditure

Year	Zones					Total
	1	2	3	4	5	
2021 (£m)	£61.19	£54.10	£47.52	£39.60	£8.85	211.26
2026 (£m)	£64.00	£56.60	£49.70	£41.42	£9.26	220.98

Notes

1. Total expenditure derived from Tables 1 and 2.

2. 2019 Prices.

Aldi, Pontfaen Road, Lampeter

Table Sb. Convenience Goods Turnover and Market Share by Zone - Summary 2021

	£m						Total	%					
	1	2	3	4	5	1			2	3	4	5	
ZONE 1													
Lampeter Town Centre													
Sainsbury's, Market Place	9.44	0.00	0.00	0.00	0.52	9.96	15.4%	0.0%	0.0%	0.0%	5.8%		
Other town centre	0.84	0.00	0.00	0.00	0.05	0.88	1.4%	0.0%	0.0%	0.0%	0.5%		
Lampeter Out-of-Centre													
Co-op, Lower Bridge Street	4.68	0.11	0.00	0.00	0.46	5.24	7.6%	0.2%	0.0%	0.0%	5.2%		
Other out-of-centre	0.14	0.00	0.00	0.00	0.06	0.20	0.2%	0.0%	0.0%	0.0%	0.7%		
Aberaeron Town Centre													
Costcutter, Market Street, Aberaeron	3.74	0.00	0.00	0.00	0.00	3.74	6.1%	0.0%	0.0%	0.0%	0.0%		
Other town centre	0.31	0.17	0.00	0.00	0.00	0.48	0.5%	0.3%	0.0%	0.0%	0.0%		
New Quay Town Centre													
Costcutter, Uplands Square, New Quay	0.96	0.00	0.00	0.00	0.00	0.96	1.6%	0.0%	0.0%	0.0%	0.0%		
Llandysul Town Centre													
Llandysul OOC	2.40	0.00	0.00	0.17	0.00	2.57	3.9%	0.0%	0.0%	0.4%	0.0%		
Llanybydder Town Centre	0.10	0.00	0.00	0.00	0.12	0.22	0.2%	0.0%	0.0%	0.0%	1.4%		
Out of Centre Floorspace													
Llandysul OOC	1.15	0.51	0.00	0.00	0.00	1.67	1.9%	0.9%	0.0%	0.0%	0.0%		
Aberaeron OOC	0.32	0.00	0.00	0.00	0.00	0.32	0.5%	0.0%	0.0%	0.0%	0.0%		
Other Zone 1 Floorspace	2.12	0.00	0.10	0.00	0.15	2.37	3.5%	0.0%	0.2%	0.0%	1.6%		
Zone 1 Sub-Total	26.20	0.79	0.10	0.17	1.35	28.61	42.8%	1.5%	0.2%	0.4%	15.2%		
ZONE 2													
Aberystwyth Town Centre													
Lidl, Alexandra Road, Rheidol Retail Park, Aberystwyth	2.46	7.62	0.00	0.00	0.00	10.09	4.0%	14.1%	0.0%	0.0%	0.0%		
Tesco Express, North Parade, Aberystwyth	0.00	1.82	0.46	0.00	0.00	2.28	0.0%	3.4%	1.0%	0.0%	0.0%		
Tesco Superstore, Park Avenue, Aberystwyth	2.06	9.59	0.00	0.00	0.00	11.65	3.4%	17.7%	0.0%	0.0%	0.0%		
Other town centre	0.74	4.61	0.00	0.00	0.00	5.35	1.2%	8.5%	0.0%	0.0%	0.0%		
Aberystwyth Out-of-Centre													
Morrisons, Parc y Llyn, Aberystwyth	4.30	17.35	0.69	0.00	0.05	22.39	7.0%	32.1%	1.4%	0.0%	0.6%		
Other out-of-centre	0.00	2.59	0.00	0.00	0.00	2.59	0.0%	4.8%	0.0%	0.0%	0.0%		
Other Zone 2 Floorspace	0.00	4.29	0.00	0.00	0.00	4.29	0.0%	7.9%	0.0%	0.0%	0.0%		
Zone 2 Sub-Total	9.56	47.88	1.15	0.00	0.05	58.64	15.6%	88.5%	2.4%	0.0%	0.6%		
ZONE 3													
Carmarthen Town Centre													
Carmarthen Out-of-Centre	0.52	0.00	7.15	0.23	0.17	8.07	0.9%	0.0%	15.0%	0.6%	1.9%		
Aldi, Stephens Way, Carmarthen	3.35	0.00	5.40	0.00	0.55	9.30	5.5%	0.0%	11.4%	0.0%	6.2%		
Farmfoods, Stephens Way, Pensarn, Carmarthen	0.58	0.00	0.17	0.49	0.03	1.27	0.9%	0.0%	0.4%	1.2%	0.4%		
Morrisons, Parc Pensarn, Carmarthen	0.50	0.00	6.07	0.47	0.45	7.49	0.8%	0.0%	12.8%	1.2%	5.1%		
Tesco Extra, Morfa Laen, Carmarthen	3.46	0.00	14.35	0.33	1.08	19.22	5.7%	0.0%	30.2%	0.8%	12.2%		
Lidl, Friars Park, Carmarthen	1.21	0.00	5.24	0.24	0.48	7.17	2.0%	0.0%	11.0%	0.6%	5.4%		
Other out-of-centre	0.44	0.00	2.58	0.00	0.00	3.02	0.7%	0.0%	5.4%	0.0%	0.0%		
Other Zone 3 Floorspace	0.41	0.00	1.57	0.00	0.02	2.00	0.7%	0.0%	3.3%	0.0%	0.3%		
Zone 3 Sub-Total	10.47	0.00	42.52	1.77	2.78	57.54	17.1%	0.0%	89.5%	4.5%	31.4%		
ZONE 4													
Cardigan Town Centre													
Cardigan Out-of-Centre	0.00	0.00	0.00	2.19	0.00	2.19	0.0%	0.0%	0.0%	5.5%	0.0%		
Aldi, Aberystwyth Road, Cardigan	4.43	0.61	0.00	8.76	0.00	13.81	7.2%	1.1%	0.0%	22.1%	0.0%		
Tesco Superstore, Aberystwyth Road, New Town, Cardigan	4.00	2.47	0.46	16.01	0.04	22.98	6.5%	4.6%	1.0%	40.4%	0.4%		
Other out-of-centre	0.44	0.00	0.24	1.81	0.03	2.51	0.7%	0.0%	0.5%	4.6%	0.3%		
Newcastle Emllyn Town Centre													
Co-op, Sycamore Street, Newcastle Emllyn	0.00	0.00	0.00	0.00	0.00	0.00	0.0%	0.0%	0.0%	0.0%	0.0%		
Other town centre	0.10	0.00	0.17	1.03	0.00	1.30	0.2%	0.0%	0.4%	2.6%	0.0%		
Other out-of-centre	0.23	0.00	0.00	0.61	0.00	0.84	0.4%	0.0%	0.0%	1.5%	0.0%		
Other Zone 4 Floorspace	0.00	0.00	0.00	2.07	0.00	2.07	0.0%	0.0%	0.0%	5.2%	0.0%		
Zone 4 Sub-Total	9.69	3.09	1.03	34.14	0.07	48.01	15.8%	5.7%	2.2%	86.2%	0.8%		
ZONE 5													
Zone 5 Floorspace	0.00	0.00	0.00	0.00	0.12	0.12	0.0%	0.0%	0.0%	0.0%	1.3%		
Zone 5 Sub-Total	0.00	0.00	0.00	0.00	0.12	0.12	0.0%	0.0%	0.0%	0.0%	1.3%		
OUTSIDE OF STUDY AREA													
Llandeilo Town Centre													
Llandeilo Town Centre	0.00	0.00	0.00	0.00	0.41	0.41	0.0%	0.0%	0.0%	0.0%	4.6%		
Out of Centre Floorspace													
Aldi, Llandeilo Road, Cross Hands, Llanelli	0.00	0.00	0.00	0.00	0.43	0.43	0.0%	0.0%	0.0%	0.0%	4.8%		
Aldi, Station Crescent, Llandrindod Wells	0.00	0.00	0.46	0.00	0.00	0.46	0.0%	0.0%	1.0%	0.0%	0.0%		
Tesco Superstore, Park Street, Ammanford	0.00	0.00	0.00	0.00	0.56	0.56	0.0%	0.0%	0.0%	0.0%	6.3%		
Lidl, Cross Hands, Llanelli	0.00	0.00	0.00	0.00	0.27	0.27	0.0%	0.0%	0.0%	0.0%	3.0%		
Co-op, Rhosmaen Street, Llandeilo	0.00	0.00	0.00	0.00	1.41	1.41	0.0%	0.0%	0.0%	0.0%	16.0%		
Other out-of-centre	0.18	0.00	0.34	0.44	1.03	1.99	0.3%	0.0%	0.7%	1.1%	11.7%		
Other Floorspace/Local Stores	0.00	0.00	0.00	0.85	0.02	0.87	0.0%	0.0%	0.0%	2.2%	0.2%		
Outside Survey Area Sub-Total	0.18	0.00	0.80	1.29	4.12	6.39	0.3%	0.0%	1.7%	3.3%	46.5%		
Internet / delivery	5.10	2.34	1.91	2.23	0.37	11.95	8.3%	4.3%	4.0%	5.6%	4.2%		
TOTAL:	61.19	54.10	47.52	39.60	8.85	211.26	100.0%	100.0%	100.0%	100.0%	100.0%		

Notes

1. Turnovers by zone are derived from Table 5a. Turnovers are PARTIAL ONLY (see footnote 3., Table 5a).
2. Market shares = turnover by destination by zone divided by convenience goods spending by zone.
3. 2019 Prices.

Aldi, Pontfaen Road, Lampeter

Table 6. Convenience Goods Turnover by Destination including Tourism Expenditure Inflow

£m	Total T-O from Study Area:		Tourism Inflow:		Total T-O:		T-O Growth:
	2021 (£m)	2026 (£m)	2021 (£m)	2026 (£m)	2021 (£m)	2026 (£m)	2021-26 (£m)
ZONE 1							
Lampeter Town Centre							
Sainsbury's, Market Place	9.96	10.42	1.61	1.69	11.57	12.10	0.53
Other town centre	0.88	0.92	0.14	0.15	1.03	1.07	0.05
Lampeter Out-of-Centre							
Co-op, Lower Bridge Street	5.24	5.48	0.85	0.89	6.09	6.37	0.28
Other out-of-centre	0.20	0.21	0.03	0.03	0.23	0.25	0.01
Aberaeron Town Centre							
Costcutter, Market Street, Aberaeron	3.74	3.91	0.61	0.63	4.34	4.54	0.20
Other town centre	0.48	0.50	0.08	0.08	0.56	0.58	0.03
New Quay Town Centre							
Costcutter, Uplands Square, New Quay	0.96	1.00	0.16	0.16	1.12	1.17	0.05
Llandysul Town Centre							
Llandysul Town Centre	2.57	2.69	0.42	0.44	2.99	3.13	0.14
Llanbydder Town Centre	0.22	0.23	0.04	0.04	0.26	0.27	0.01
Out of Centre Floorspace							
Llandysul OOC	1.67	1.74	0.27	0.28	1.94	2.02	0.09
Aberaeron OOC	0.32	0.33	0.05	0.05	0.37	0.38	0.02
Other Zone 1 Floorspace	2.37	2.48	0.38	0.40	2.75	2.88	0.13
Zone 1 Sub-Total	28.61	29.93	4.64	4.85	33.25	34.77	1.53
ZONE 2							
Aberystwyth Town Centre							
Lidl, Alexandra Road, Rheidol Retail Park, Aberystwyth	10.09	10.55	1.63	1.71	11.72	12.26	0.54
Tesco Express, North Parade, Aberystwyth	2.28	2.39	0.37	0.39	2.65	2.77	0.12
Tesco Superstore, Park Avenue, Aberystwyth	11.65	12.19	1.89	1.98	13.54	14.17	0.63
Other town centre	5.35	5.59	0.87	0.91	6.21	6.50	0.29
Aberystwyth Out-of-Centre							
Morrisons, Parc y Llyn, Aberystwyth	22.39	23.42	3.63	3.79	26.01	27.22	1.20
Other out-of-centre	2.59	2.71	0.42	0.44	3.01	3.15	0.14
Other Zone 2 Floorspace	4.29	4.49	0.70	0.73	4.99	5.22	0.23
Zone 2 Sub-Total	58.64	61.35	9.50	9.94	68.14	71.29	3.15
ZONE 3							
Carmarthen Town Centre							
Carmarthen Town Centre	8.07	8.44	1.31	1.37	9.37	9.80	0.43
Carmarthen Out-of-Centre							
Aldi, Stephens Way, Carmarthen	9.30	9.73	1.51	1.58	10.81	11.30	0.50
Farmfoods, Stephens Way, Pensarn, Carmarthen	1.27	1.33	0.21	0.22	1.48	1.55	0.07
Morrisons, Parc Pensarn, Carmarthen	7.49	7.84	1.21	1.27	8.71	9.11	0.40
Tesco Extra, Morfa Laen, Carmarthen	19.22	20.10	3.11	3.26	22.33	23.36	1.03
Lidl, Friars Park, Carmarthen	7.17	7.50	1.16	1.21	8.33	8.71	0.38
Other out-of-centre	3.02	3.15	0.49	0.51	3.50	3.67	0.16
Other Zone 3 Floorspace	2.00	2.09	0.32	0.34	2.32	2.43	0.11
Zone 3 Sub-Total	57.54	60.18	9.32	9.75	66.86	69.93	3.07
ZONE 4							
Cardigan Town Centre							
Cardigan Town Centre	2.19	2.29	0.36	0.37	2.55	2.66	0.12
Cardigan Out-of-Centre							
Aldi, Aberystwyth Road, Cardigan	13.81	14.44	2.24	2.34	16.04	16.78	0.74
Tesco Superstore, Aberystwyth Road, New Town, Cardigan	22.98	24.03	3.72	3.89	26.70	27.92	1.23
Other out-of-centre	2.51	2.63	0.41	0.43	2.92	3.05	0.13
Newcastle Emlyn Town Centre							
Co-op, Sycamore Street, Newcastle Emlyn	1.30	1.36	0.21	0.22	1.51	1.58	0.07
Other town centre	0.84	0.88	0.14	0.14	0.98	1.03	0.04
Out of Centre Floorspace	2.31	2.42	0.37	0.39	2.68	2.81	0.12
Other Zone 4 Floorspace	2.07	2.16	0.34	0.35	2.40	2.51	0.11
Zone 4 Sub-Total	48.01	50.22	7.78	8.13	55.79	58.35	2.56
ZONE 5							
Zone 5 Floorspace	0.12	0.12	0.02	0.02	0.14	0.14	0.01
Zone 5 Sub-Total	0.12	0.12	0.02	0.02	0.14	0.14	0.01
OUTSIDE OF STUDY AREA							
Llandello Town Centre							
Llandello Town Centre	0.41	0.43	-	-	0.41	0.43	0.02
Out of Centre Floorspace							
Aldi, Llandello Road, Cross Hands, Llanelli	0.43	0.45	-	-	0.43	0.45	0.02
Aldi, Station Crescent, Llandrindod Wells	0.46	0.48	-	-	0.46	0.48	0.02
Tesco Superstore, Park Street, Ammanford	0.56	0.58	-	-	0.56	0.58	0.03
Lidl, Cross Hands, Llanelli	0.27	0.28	-	-	0.27	0.28	0.01
Co-op, Rhosmaen Street, Llandello	1.41	1.48	-	-	1.41	1.48	0.06
Other out-of-centre	1.99	2.09	-	-	1.99	2.09	0.09
Other Floorspace/Local Stores	0.87	0.91	-	-	0.87	0.91	0.04
Outside Survey Area Sub-Total	6.39	6.69	-	-	6.39	6.69	0.29
Internet / delivery	11.95	12.50	-	-	-	12.50	-
TOTAL:	211.26	220.98	31.25	32.69	230.57	253.67	10.60

Notes

1. Turnovers from Study Area taken from Tables Sa - Sc.
2. Uplift in turnover from tourism (16.2% uplift on residents' spending) is based on Carter Jonas ('CJ') South West Wales Regional Retail Study, February 2017, Table 7, Appendix 5, and Main SWWRBS report, para 9.67.
3. 16.2% uplift has been applied to destinations in zones 1-5 (the rate applied by CJ to centres in Ceredigion). No additional inflow from beyond the Study Area is assumed to ensure a robust assessment.
4. The turnover of locations beyond and on the periphery of the Study Area will be PARTIAL ONLY due to the Study Area excluding sources of spending potentially available to these destinations.
5. 2019 Prices.

Aldi, Pontfaen Road, Lampeter

Table 7a: Proposed Aldi Store - Turnover Estimate

New Destination	Net Floor Areas (sq. m)			Sales Density 2021 (£)		Benchmark Turnover 2021 (£m)		Benchmark Turnover 2026 (£m)	
	Total Net	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison
Proposed Aldi, Lampeter	1,315	1,052	263	12,126	10,538	12.76	2.77	13.01	3.03

Notes

1. Aldi Sales Density Figures taken from Mintel 2020 (2019 data) and grown by 0.4%pa (compound) to give a 2021 estimate.
2. Proposal convenience/comparison sales area based on an 80%/20% split.
3. Floorspace efficiency at +0.4% per annum for convenience goods and +1.8% per annum for comparison goods applied between 2021 and 2026.
4. 2019 Prices.

Aldi, Pontfaen Road, Lampeter

Table 7b: Proposal Trade Draw Pattern

New Destination	Zone:					Total
	1	2	3	4	5	
Proposed Aldi, Lampeter						
<i>2026 Convenience Goods Turnover (£m)</i>						13.01
<i>Draw from Study Area (%)</i>						83.80%
<i>2026 Convenience Goods Turnover from Study Area (£m)</i>						10.91
Trade Draw						
%	75.0%	5.0%	5.0%	7.5%	7.5%	100.0%
£m	8.18	0.55	0.55	0.82	0.82	10.91

Notes

1. Trade draw based on existing Lampeter convenience goods shopping patterns by zone and estimated draw of store by Zone.
2. Aldi store is assumed to derive 16.2% of its convenience goods turnover from beyond the Study Area (principally through 'tourism inflow') (SWWRRS, Appendix 5, Table 7).
(see Table 6, footnotes 2 & 3).
3. 2019 Prices.

Aldi, Pontfaen Road, Lampeter

Table 9. Solus Convenience Goods Impacts (2026)

	Turnover 2026 (£m)	Trade Draw (%)	Trade Draw (£m)	Resultant Turnover (£m)	Impact (%)
ZONE 1					
Lampeter Town Centre					
Sainsbury's, Market Place	£12.10	12.0%	£1.31	£10.80	-10.8%
Other town centre	£1.07	1.0%	£0.11	£0.97	-10.1%
Total Lampeter Town Centre	£13.18	13.0%	£1.42	£11.76	-10.8%
Lampeter Out-of-Centre					
Co-op, Lower Bridge Street	£6.37	6.0%	£0.65	£5.72	-10.3%
Other out-of-centre	£0.25	0.0%	£0.00	£0.25	0.0%
Aberaeron Town Centre					
Costcutter, Market Street, Aberaeron	£4.54	4.0%	£0.44	£4.11	-9.6%
Other town centre	£0.58	0.5%	£0.05	£0.53	-9.4%
New Quay Town Centre					
Costcutter, Uplands Square, New Quay	£1.17	1.0%	£0.11	£1.06	-9.3%
Llandysul Town Centre					
Llandysul Town Centre	£3.13	3.0%	£0.33	£2.80	-10.5%
Llanybydder Town Centre	£0.27	0.0%	£0.00	£0.27	0.0%
Out of Centre Floorspace					
Llandysul OOC	£2.02	2.0%	£0.22	£1.81	-10.8%
Aberaeron OOC	£0.38	0.0%	£0.00	£0.38	0.0%
Other Zone 1 Floorspace					
	£2.88	3.0%	£0.33	£2.55	-11.4%
Zone 1 Sub-Total	£34.77	32.5%	£3.54	£31.23	-10.2%
ZONE 2					
Aberystwyth Town Centre					
Lidl, Alexandra Road, Rheidol Retail Park, Aberystwyth	£12.26	6.0%	£0.65	£11.61	-5.3%
Tesco Express, North Parade, Aberystwyth	£2.77	0.0%	£0.00	£2.77	0.0%
Tesco Superstore, Park Avenue, Aberystwyth	£14.17	5.0%	£0.55	£13.62	-3.8%
Other town centre	£6.50	1.0%	£0.11	£6.39	-1.7%
Total Aberystwyth Town Centre	£35.70	12.0%	£1.31	£34.40	-3.7%
Aberystwyth Out-of-Centre					
Morrisons, Parc y Llyn, Aberystwyth	£27.22	7.0%	£0.76	£26.45	-2.8%
Other out-of-centre	£3.15	0.0%	£0.00	£3.15	0.0%
Other Zone 2 Floorspace					
	£5.22	0.5%	£0.05	£5.16	-1.0%
Zone 2 Sub-Total	£71.29	19.5%	£2.13	£69.16	-3.0%
ZONE 3					
Carmarthen Town Centre					
	£9.80	1.0%	£0.11	£9.70	-1.1%
Carmarthen Out-of-Centre					
Aldi, Stephens Way, Carmarthen	£11.30	6.0%	£0.65	£10.65	-5.8%
Farmfoods, Stephens Way, Pensarn, Carmarthen	£1.55	1.0%	£0.11	£1.44	-7.0%
Morrisons, Parc Pensarn, Carmarthen	£9.11	1.0%	£0.11	£9.00	-1.2%
Tesco Extra, Morfa Laen, Carmarthen	£23.36	6.0%	£0.65	£22.70	-2.8%
Lidl, Friars Park, Carmarthen	£8.71	3.0%	£0.33	£8.39	-3.8%
Other out-of-centre	£3.67	0.5%	£0.05	£3.61	-1.5%
Other Zone 3 Floorspace					
	£2.43	1.0%	£0.11	£2.32	-4.5%
Zone 3 Sub-Total	£69.93	19.5%	£2.13	£67.80	-3.0%
ZONE 4					
Cardigan Town Centre					
	£2.66	0.5%	£0.05	£2.61	-2.0%
Cardigan Out-of-Centre					
Aldi, Aberystwyth Road, Cardigan	£16.78	10.0%	£1.09	£15.69	-6.5%
Tesco Superstore, Aberystwyth Road, New Town, Cardigan	£27.92	10.0%	£1.09	£26.83	-3.9%
Other out-of-centre	£3.05	1.0%	£0.11	£2.94	-3.6%
Newcastle Emlyn Town Centre					
Co-op, Sycamore Street, Newcastle Emlyn	£1.58	0.5%	£0.05	£1.53	-3.4%
Other town centre	£1.03	0.5%	£0.05	£0.97	-5.3%
Out of Centre Floorspace					
Newcastle Emlyn OOC	£2.81	1.0%	£0.11	£2.70	-3.9%
Other Zone 4 Floorspace					
	£2.51	0.5%	£0.05	£2.46	-2.2%
Zone 4 Sub-Total	£58.35	24.0%	£2.62	£55.73	-4.5%
ZONE 5					
Zone 5 Floorspace					
	£0.14	0.0%	£0.00	£0.14	0.0%
Zone 5 Sub-Total	£0.14	0.0%	£0.00	£0.14	0.0%
OUTSIDE OF STUDY AREA					
Llandello Town Centre					
	£0.43	0.0%	£0.00	£0.43	-
Out of Centre Floorspace					
Aldi, Llandello Road, Cross Hands, Llanelli	£0.45	0.5%	£0.05	£0.39	-
Aldi, Station Crescent, Llandrindod Wells	£0.48	0.0%	£0.00	£0.48	-
Tesco Superstore, Park Street, Ammanford	£0.58	0.0%	£0.00	£0.58	-
Lidl, Cross Hands, Llanelli	£0.28	0.0%	£0.00	£0.28	-
Co-op, Rhosmaen Street, Llandello	£1.48	1.0%	£0.11	£1.37	-
Other out-of-centre	£2.09	1.0%	£0.11	£1.98	-
Other Floorspace/Local Stores					
	£0.91	0.0%	£0.00	£0.91	-
Outside Survey Area Sub-Total	£6.69	2.5%	£0.27	£6.42	-
Internet / delivery	£12.50	2.0%	£0.22	£12.28	-1.7%
TOTAL:	£253.67	100.0%	£10.91	-	-

Notes

1. Trade draw rates derived from Table 8 ('Adjusted Trade Draws').
2. 2019 Prices.

Aldi, Pontfaen Road, Lampeter

Table 10: Commitment: Aldi, Park Avenue, Aberystwyth - Turnover Estimate

New Destination	Net Floor Areas (sq. m)			Sales Density 2021 (£)		Benchmark Turnover 2021 (£m)		Benchmark Turnover 2026 (£m)	
	Total Net	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison
Aldi, Park Avenue, Aberystwyth	1,133	906	227	12,126	10,538	10.99	2.39	11.21	2.61

Notes

1. The commitment is Planning Permission No. A151045.
2. Aldi Sales Density Figures taken from Mintel 2020 (2019 data) and grown by 0.4%pa (compound) to give a 2021 estimate.
3. Proposal convenience/comparison sales area based on an 80%/20% split.
4. Floorspace efficiency at +0.4% per annum for convenience goods and +1.8% per annum for comparison goods applied between 2021 and 2026
5. 2019 Prices.

Aldi, Pontfaen Road, Lampeter

Table 11: Commitment: Aldi, Park Avenue, Aberystwyth - Trade Draw

New Destination	Zone:					Total
	1	2	3	4	5	
Proposed Aldi, Aberystwyth						
<i>2026 Convenience Goods Turnover (£m)</i>						11.21
<i>Draw from Study Area (%)</i>						83.80%
<i>2026 Convenience Goods Turnover from Study Area (£m)</i>						9.40
Trade Draw						
%	20.0%	70.0%	4.0%	4.0%	2.0%	100.0%
£m	1.88	6.58	0.38	0.38	0.19	9.40

Notes

1. Trade draw based on existing convenience goods shopping patterns by zone and estimated draw of store by Zone.
2. Aldi store is assumed to derive 16.2% of its convenience goods turnover from beyond the Study Area (principally through 'tourism inflow') (SWWRRS, Appendix 5, Table 7).
(see Table 6, footnotes 2 & 3).
3. 2019 Prices.

Aldi, Pontfaen Road, Lampeter

Table 12. Cumulative Convenience Goods Impacts (2026)

	Turnover 2026	TD: Aldi, Aberystwyth	Post-Impact TO	TD: Aldi, Lampeter	Resultant Turnover	Cumulative Impact		
	(£m)	(%)	(£m)	(%)	(£m)	%		
ZONE 1								
Lampeter Town Centre								
Sainsbury's, Market Place	£12.10	3.0%	£0.28	£11.82	11.0%	£1.20	£10.62	-12.2%
Other town centre	£1.07	0.0%	£0.00	£1.07	1.0%	£0.11	£0.97	-10.1%
Total Lampeter Town Centre	£13.18	3.0%	£0.28	£12.90	12.0%	£1.31	£11.59	-12.1%
Lampeter Out-of-Centre								
Co-op, Lower Bridge Street	£6.37	2.0%	£0.19	£6.19	5.0%	£0.55	£5.64	-11.5%
Other out-of-centre	£0.25	0.0%	£0.00	£0.25	0.0%	£0.00	£0.25	0.0%
Aldi, Pontfaen Road, Lampeter	-	-	-	-	-	£10.91	-	-
Aberaeron Town Centre								
Costcutter, Market Street, Aberaeron	£4.54	1.0%	£0.09	£4.45	3.5%	£0.38	£4.07	-10.5%
Other town centre	£0.58	0.0%	£0.00	£0.58	0.5%	£0.05	£0.53	-9.4%
New Quay Town Centre								
Costcutter, Uplands Square, New Quay	£1.17	0.0%	£0.00	£1.17	1.0%	£0.11	£1.06	-9.3%
Llandysul Town Centre								
Llandysul Town Centre	£3.13	0.5%	£0.05	£3.08	2.5%	£0.27	£2.81	-10.2%
Llanybydder Town Centre	£0.27	0.0%	£0.00	£0.27	0.0%	£0.00	£0.27	0.0%
Out of Centre Floorspace								
Llandysul OOC	£2.02	1.0%	£0.09	£1.93	2.0%	£0.22	£1.71	-15.4%
Aberaeron OOC	£0.38	0.0%	£0.00	£0.38	0.0%	£0.00	£0.38	0.0%
Other Zone 1 Floorspace	£2.88	0.5%	£0.05	£2.83	2.5%	£0.27	£2.56	-11.1%
Zone 1 Sub-Total	£34.77	8.0%	£0.75	£34.02	29.0%	£3.16	£41.77	20.1%
ZONE 2								
Aberystwyth Town Centre								
Lidl, Alexandra Road, Rheidol Retail Park, Aberystwyth	£12.26	11.0%	£1.03	£11.23	5.5%	£0.60	£10.63	-13.3%
Tesco Express, North Parade, Aberystwyth	£2.77	2.0%	£0.19	£2.59	0.0%	£0.00	£2.59	-6.8%
Tesco Superstore, Park Avenue, Aberystwyth	£14.17	13.0%	£1.22	£12.95	4.5%	£0.49	£12.46	-12.1%
Other town centre	£6.50	5.0%	£0.47	£6.03	1.0%	£0.11	£5.92	-8.9%
Total Aberystwyth Town Centre	£35.70	31.0%	£2.91	£32.79	11.0%	£1.20	£31.59	-11.5%
Aberystwyth Out-of-Centre								
Morrisons, Parc y Llyn, Aberystwyth	£27.22	28.0%	£2.63	£24.58	6.0%	£0.65	£23.93	-12.1%
Other out-of-centre	£3.15	5.0%	£0.47	£2.68	0.0%	£0.00	£2.68	-14.9%
Aldi, Park Avenue, Aberystwyth	-	-	-	£9.40	8.0%	£0.87	£8.52	-9.3%
Other Zone 2 Floorspace	£5.22	6.0%	£0.56	£4.65	0.5%	£0.05	£4.60	-11.9%
Zone 2 Sub-Total	£71.29	70.0%	£6.58	£74.11	25.5%	£2.78	£71.33	0.1%
ZONE 3								
Carmarthen Town Centre								
Carmarthen Town Centre	£9.80	1.0%	£0.09	£9.71	1.0%	£0.11	£9.60	-2.1%
Carmarthen Out-of-Centre								
Aldi, Stephens Way, Carmarthen	£11.30	2.0%	£0.19	£11.11	6.0%	£0.65	£10.46	-7.5%
Farmfoods, Stephens Way, Pensarn, Carmarthen	£1.55	0.0%	£0.00	£1.55	1.0%	£0.11	£1.44	-7.0%
Morrisons, Parc Pensarn, Carmarthen	£9.11	1.0%	£0.09	£9.01	1.0%	£0.11	£8.90	-2.2%
Tesco Extra, Morfa Laen, Carmarthen	£23.36	3.0%	£0.28	£23.08	6.0%	£0.65	£22.42	-4.0%
Lidl, Friars Park, Carmarthen	£8.71	2.0%	£0.19	£8.53	3.0%	£0.33	£8.20	-5.9%
Other out-of-centre	£3.67	0.0%	£0.00	£3.67	0.5%	£0.05	£3.61	-1.5%
Other Zone 3 Floorspace	£2.43	0.0%	£0.00	£2.43	1.0%	£0.11	£2.32	-4.5%
Zone 3 Sub-Total	£69.93	9.0%	£0.85	£69.08	19.5%	£2.13	£66.95	-4.3%
ZONE 4								
Cardigan Town Centre								
Cardigan Town Centre	£2.66	0.0%	£0.00	£2.66	0.5%	£0.05	£2.61	-2.0%
Cardigan Out-of-Centre								
Aldi, Aberystwyth Road, Cardigan	£16.78	4.0%	£0.38	£16.40	9.0%	£0.98	£15.42	-8.1%
Tesco Superstore, Aberystwyth Road, New Town, Cardigan	£27.92	6.0%	£0.56	£27.36	9.0%	£0.98	£26.38	-5.5%
Other out-of-centre	£3.05	1.0%	£0.09	£2.96	1.0%	£0.11	£2.85	-6.7%
Newcastle Emlyn Town Centre								
Co-op, Sycamore Street, Newcastle Emlyn	£1.58	0.0%	£0.00	£1.58	0.5%	£0.05	£1.53	-3.4%
Other town centre	£1.03	0.0%	£0.00	£1.03	0.5%	£0.05	£0.97	-5.3%
Out of Centre Floorspace	£2.81	0.0%	£0.00	£2.81	1.0%	£0.11	£2.70	-3.9%
Other Zone 4 Floorspace	£2.51	0.0%	£0.00	£2.51	0.5%	£0.05	£2.46	-2.2%
Zone 4 Sub-Total	£58.35	11.0%	£1.03	£57.32	22.0%	£2.40	£54.92	-5.9%
ZONE 5								
Zone 5 Floorspace	£0.14	0.0%	£0.00	£0.14	0.0%	£0.00	£0.14	0.0%
Zone 5 Sub-Total	£0.14	0.0%	£0.00	£0.14	0.0%	£0.00	£0.14	0.0%
OUTSIDE OF STUDY AREA								
Llandello Town Centre								
Llandello Town Centre	£0.43	0.0%	£0.00	£0.43	0.0%	£0.00	£0.43	-
Out of Centre Floorspace								
Aldi, Llandello Road, Cross Hands, Llanelli	£0.45	0.0%	£0.00	£0.45	0.5%	£0.05	£0.39	-
Aldi, Station Crescent, Llandrindod Wells	£0.48	0.0%	£0.00	£0.48	0.0%	£0.00	£0.48	-
Tesco Superstore, Park Street, Ammanford	£0.58	0.0%	£0.00	£0.58	0.0%	£0.00	£0.58	-
Lidl, Cross Hands, Llanelli	£0.28	0.0%	£0.00	£0.28	0.0%	£0.00	£0.28	-
Co-op, Rhosmaen Street, Llandello	£1.48	0.0%	£0.00	£1.48	1.0%	£0.11	£1.37	-
Other out-of-centre	£2.09	0.0%	£0.00	£2.09	1.0%	£0.11	£1.98	-
Other Floorspace/Local Stores	£0.91	0.0%	£0.00	£0.91	0.0%	£0.00	£0.91	-
Outside Survey Area Sub-Total	£6.69	0.0%	£0.00	£6.69	2.5%	£0.27	£6.42	-
Internet / delivery	£12.50	2.0%	£0.19	£12.31	1.5%	£0.16	£12.15	-2.8%
TOTAL:	£253.67	100.0%	£9.40	£253.67	100.0%	£10.91	£253.67	-

Notes

- Trade diversion rates derived from Tables 8-11. Trade draws adjusted (from Table 9) to allow for impacts of Aldi Lampeter proposal on committed Aldi store at Park Ave., Aberystwyth.
- 2019 Prices.

Aldi, Pontfaen Road, Lampeter

Table 13. Convenience Goods Expenditure Capacity

	2021	2026 (1)	2026 (2)
Available Expenditure in Study Area (£m)	211.26	220.98	220.98
Turnover/potential turnover from stores in the Catchment (£m)	192.92	201.79	212.84
Market Share - Zones 1-5 (%)	91.3%	91.3%	96.3%
Tourism Inflow (16.2%) (£m)	31.25	32.69	34.48
Total Turnover Potential of Convenience Goods Facilities (£m)	224.17	234.48	247.32
Benchmark Turnover of Convenience Goods Facilities (£m)	224.17	228.69	228.69
Residual Expenditure (Capacity) (£m)	0.00	5.79	18.63
Turnover of Commitment (£m)	-	11.21	11.21
Turnover of Application Proposal (£m)	-	13.01	13.01
Residual Expenditure Post-Commitment & Proposal (£m)	-	-18.44	-5.60

Notes

1. Available Expenditure is taken from Table 3.
2. Turnover from Study Area is taken from Tables 5a-6.
3. Market Share is Turnover from Study Area divided by Available Expenditure (in Zones 1-5).
4. Expenditure Inflow refers to tourism expenditure drawn from outside of the Study Area (see Table 6, footnotes 2 & 3).
5. Turnover Potential is market share multiplied by expenditure, plus inflow.
6. Benchmark Turnover of Convenience Goods Facilities is actual turnover in 2021 taken from Table 5a.
Floorspace efficiency (+0.4% pa) has been applied to generate a total benchmark turnover in 2026.
7. Residual Expenditure (Capacity) is Total Turnover Potential of Convenience Goods Facilities minus Benchmark Turnover.
8. Due to the potential of both Aldi proposals to retain additional spending, market shares have been increased by 5% in the alternative scenario (2026(2)).
Inflow in this scenario has been increased in line with increased expenditure, but maintained at 16.2%
9. 2019 prices.

Aldi, Pontfaen Road, Lampeter

Table 14. Total Impacts on Lampeter Town Centre

	Turnover 2021:			Turnover 2026:			Solus Diversion 2026:			Solus Impact	Cumulative Diversion 2026:			Cumulative Impact	Post-Impact Total Turnover 2026	Change in Turnover 2021-26:	
	Conv (£m)	Comp (£m)	Total (£m)	Conv (£m)	Comp (£m)	Total (£m)	Conv (£m)	Comp (£m)	Total (£m)	(%age)	Conv (£m)	Comp (£m)	Total (£m)	(%age)	(£m)	(£m)	(%age)
Lampeter Town Centre	12.60	26.18	38.78	13.18	30.87	44.05	1.42	0.76	2.18	-4.9%	1.59	1.02	2.61	-5.9%	41.44	2.66	6.8%

Notes

1. Convenience goods turnovers for Lampeter town centre in 2021 and 2026 are taken from Table 6.
2. Comparison goods turnovers for Lampeter town centre in 2021 and 2026 are derived from the SWWRRS, Appendix 6, Table 7 (£25.7 million - 2021; £30.30 million - 2026; both at 2014 prices - see SWWRRS, para 9.4, bullet point 2).
3. Comparison goods turnovers have been converted from 2014 to 2019 prices using 'Precisely' price indices (Retail Expenditure Product Guide Version: 2020-21, Table 3.1).
4. Solus and cumulative convenience goods diversions for Lampeter town centre are taken from Tables 9 and 12.
5. Comparison diversions assume that 25% of Aldi store comparison goods turnover is diverted from Lampeter town centre in 2026; and 10% of the comparison store turnover of the committed Aldi at Aberyswyth. These are robust, 'worst-case' assumptions.
6. The change in turnover 2021-26 is the difference between base and design year total turnovers, minus cumulative diversions. The figures shown in the table relate to cumulative impacts only.
7. 2019 prices.