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13 April 2026

To whom it may concern

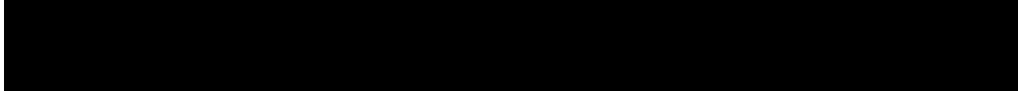
RE: Response to the invitation to comment on the proposed designation of Aldi and Lidl under the Controlled Land Order 2010

Section A: Introductory Remarks

1. This submission is made by Iceland Foods Limited (**Iceland**), and responds to the “Invitation to Comment” on the consultation published on 12 March 2026 by the Competition and Markets Authority (**CMA**) regarding the proposed designation of Aldi and Lidl under the Groceries Market Investigation (Controlled Land) Order 2010 (the **CLO**) (the **Consultation**). References in this submission to “question” refer to the CMA’s questions set out in paragraph 6 of the Consultation.
2. Iceland is British grocery retailer, operating around 950 stores across the UK, under its Iceland and Food Warehouse brands. It has c.2.3% share of the UK grocery market.¹ Iceland has an interest in this Consultation, and its effect on competition and consumers in the UK grocery market. It sets out its views on the Consultation, below.
3. Iceland considers that the CMA **ought to designate each of Aldi and Lidl** as Large Grocery Retailers² (**LGRs**) under the CLO, given that:

¹ Kantar data for the 12 weeks to 22 March 2026.

² Unless otherwise defined, capitalised terms bear the meaning ascribed to them in the CLO.

- a. At the time the CLO was drafted, it was clearly envisaged that Grocery Retailers other than the first and current LGRs might suitably warrant designation.³ Aldi and Lidl each **satisfy**, or on any lawful assessment are capable of satisfying, **the statutory criteria for designation set out in Article 3(4) of the CLO**. Designation of Aldi and Lidl is thus a predictable and proportionate outcome of a measured and proper application of the CLO. See also the response to Question 1, below.
- b. It is not rational nor proportionate to designate retailers with a smaller market presence than Aldi and Lidl, while declining to designate Aldi and Lidl themselves. Given their current respective market shares and competitive significance, **designation of Aldi and Lidl is justified, consistent with the principle of equal treatment and necessary to establish a level playing field for competition in the UK grocery market**. Without objective justification, differential treatment by the CMA of similar retailers would be arbitrary, and could distort rather than safeguard competition for groceries.
- c. 
Designation of Aldi and Lidl under the CLO does not create a significant regulatory burden for Aldi and Lidl; rather designation **is a reasonable and proportionate measure which simply prevents conduct that restricts the use of land for grocery retailing**, to help promote customer choice and strengthen local competition. See also the response to Question 2, below.
- d. **The CLO must be administered in a manner that ensures it remains responsive to and reflective of, current market realities**. It has been 16 years since the CLO was first enacted – a process which itself was subject to extensive review and public consultation. The changing dynamics in the grocery market have been well-documented since then in various CMA reports, studies and cases – including as regards the growth of Aldi and Lidl since 2010. A thorough reconsideration of designation is required to help ensure that the CLO evolves in line with changing market conditions, and does not become outdated, ineffective, and / or unsuitable to fulfil the very rationale for which it was introduced – which is to prohibit conduct that effectively limits consumer choice in local areas, and thus inhibits robust competition for groceries. This is particularly important considering the ongoing geopolitical conflict which has resulted in rising costs and prices: whilst macroeconomic conditions do not themselves determine designation, they reinforce the importance of the CMA exercising its functions in a manner that is timely, proportionate, and directed at maintaining effective competition for the benefit of consumers, especially the most vulnerable, who are particularly reliant on strong competition to help manage stretched household budgets (e.g. by trading down to less expensive retailers or switching to own brand variants). Customers can only change their shopping habits in this

³ See paragraph 7 of the Explanatory Note to the CLO, together with Article 3 of the CLO.

manner where there is in fact a choice of competing retailers across local communities.

4. Ongoing monitoring and review of the CLO (including as regards the designation of entities under it) is necessary to ensure the proper, lawful and rational administration of the CLO by the CMA, in line with its statutory duties under the Enterprise Act. Considering also the CMA's commitment to the 4Ps (pace, proportionality, process and predictability), **it is important that the CMA deploys the powers at its disposal rationally and timeously to designate Aldi and Lidl as LGRs.**
5. Iceland addresses the questions in the Consultation in Section B below.

Section B: Our response to the invitation to comment

Question 1: Please provide any information which you think is relevant to our assessment of whether Aldi and Lidl should continue to be considered Limited Assortment Discounters or be designated as Large Grocery Retailers under the Order.

6. Under the CLO, a "Limited Assortment Discounter" (**LAD**) is defined as "*a Grocery Retailer which sells a significantly more limited range of Groceries than a Large Grocery Retailer at a low price*".
7. An LGR is defined as "*a person designated from time to time as a Large Grocery Retailer in accordance with Article 3*".
8. In Iceland's view, the question of designation as an LGR turns entirely on whether a potential designee satisfies the designation criteria in Article 3, and is designated as such by the CMA.
9. Our understanding is that the Article 3(4) criteria are intended to operate collectively as a "sufficiency benchmark" to gauge whether a Grocery Retailer possesses the requisite size, scale, and market significance to warrant designation under the CLO. In other words, does a potential designee exert a degree of competitive influence such that its conduct — including in particular its conduct relating to the acquisition, control and use of land — is capable of materially affecting competition in UK grocery market?
10. Iceland considers that Aldi and Lidl meet this "sufficiency benchmark" in that they each satisfy, or on any lawful assessment are capable of satisfying, all three of the designation criteria set out in Article 3(4) of the CLO.
11. Clearly, Aldi and Lidl were relatively recent entrants to the UK market at the time the CLO came into force. Since then, however, both the grocery landscape and customer purchasing behaviour has evolved materially. As described below, Aldi and Lidl now command a significant individual and combined share of the UK grocery market, and offer customers a considerably wider range of products from a much broader geographic footprint, than was the case in 2010. As described below, their competitive challenge

and influence have been firmly observed within the LGR market segment, and not within any other identified subgroup or distinct segment.

12. First, Aldi and Lidl each operate Larger Grocery Stores across substantial parts of the UK.⁴ Public sources indicate that each of Aldi and Lidl now operate more than 1000 stores (Aldi 1087 stores and Lidl 1015 stores, as at 26 March 2026⁵) with broad geographic coverage across the UK (see the maps below which confirm this). Each also has ambitious plans to continue to grow.⁶ This differs starkly from the position prior to the inception of the CLO, where the combined store number of Aldi, Lidl and Netto was deemed to be in the region of 1000 stores across the UK.⁷

Figure 1: Aldi’s store count across the UK⁸



⁴ Article 3(4)(a) of the CLO.

⁵ Sources: <https://www.aldi.co.uk/store-finder> and <https://www.scrapehero.com/location-reports/Lidl-UK/>

⁶ See for instance: <https://www.thegrocer.co.uk/news/lidl-to-open-50-stores-in-12-months-in-600m-investment/717469.article>

⁷ Groceries Market Investigation, 3.12.

⁸ Source: <https://www.aldi.co.uk/store-finder>. Although Aldi does not operate any stores in Northern Ireland, this ought not to have a material bearing on its satisfaction of this criterion – Iceland understands that Morrisons (which is already designated as an LGR), also has no presence in Northern Ireland.

Figure 2: Lidl's store count across the UK⁹



⁹Source: <https://mapstack.io/map/BksyB3/map-of-lidl-locations-uk>

13. While some of Aldi and Lidl's first generation and/or London-based high street stores may not have a Net Sales Area of 1000sqm, Aldi and Lidl's current published store requirements specify that they are each seeking new space with a footprint of at least 18-20k sqft (c.1,600 - 1858sqm).¹⁰ This is well in excess of the threshold for a Larger Grocery Store, and gives an indication of the type of store they each do and intend to operate going forward.
14. Second, *Aldi and Lidl each carry a full range of Groceries for sale at the retail level.*¹¹ At the time the CLO came into force, Aldi and Lidl each sold around 1000 products (**SKUs**) to customers.¹² Since then, both retailers have significantly increased their product range. Public sources indicate that each of Aldi and Lidl currently range around 4500 SKUs. More fundamentally, both Aldi and Lidl make available a full range of household essential items, being the staple grocery items that are purchased most commonly to meet the basic, everyday needs of average households across the UK. This would include items such as bread, milk, fruit, vegetables, meat, toiletries and cleaning products. In Iceland's view, a customer is most likely to consider switching all or part of their weekly shop between retailers that make available this core range of groceries. To help illustrate this, the figures below depict the degree of switching to Aldi (Figure 3) and to Lidl (Figure 4) from other retailers (both LGRs and others) over the last 12 months. Green indicates gains from, and red indicates losses to. On the basis of this data, Aldi has been winning customers from a range of retailers, most notably Asda, Morrisons and Co-op and has been losing customers to Lidl, Tesco, Sainsbury's, and to some extent, Iceland. Lidl has been winning customers from most retailers including Aldi, Asda, Tesco, Morrisons and to a lesser extent Co-op, Sainsbury's, Waitrose and Iceland. This degree of customer switching would not be so apparent if customers did not consider Aldi and Lidl to carry a full and functional range of Groceries that is substitutable with that offered by the LGRs.

¹⁰ See for instance <https://www.aldi.co.uk/corporate/property/required-towns> and <https://www.realestate-lidl.co.uk/new-store-site-requirements>

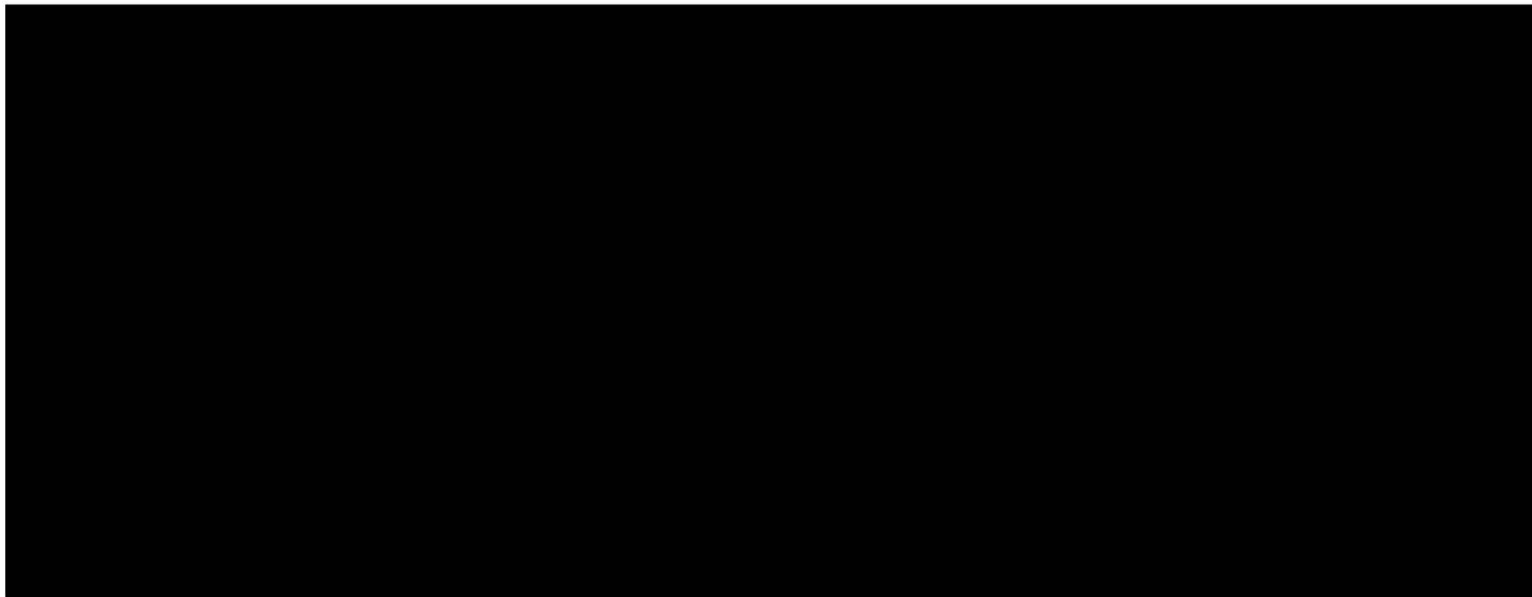
¹¹ Article 3(4)(b) of the CLO.

¹² Annex 3.1 of the final report in the Groceries Market Investigation 2008.

[REDACTED]

Figure 3: [REDACTED]

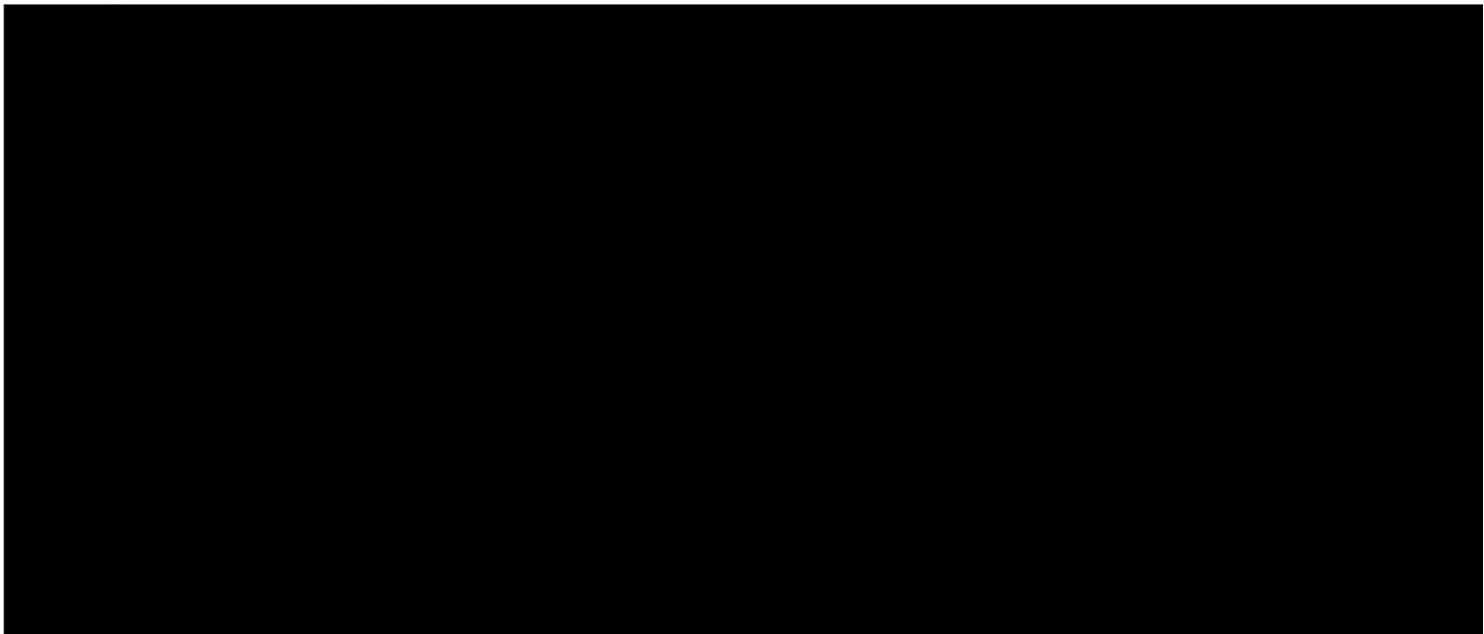
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[REDACTED]

Figure 4: [REDACTED]

14



13 [REDACTED]
14 [REDACTED]

15. It is also pertinent that each of Aldi and Lidl hold themselves out as “supermarkets”; advertise “groceries” prominently through their websites and in marketing materials, and directly compare their product offering and prices to that available for purchase from other LGRs, to compete with and induce customer switching from, the LGRs. It is untenable for Aldi and Lidl to suggest that they offer a sufficient range of groceries which would enable customers to complete a full shop at their stores; but an insufficient number or range of Groceries to warrant designation under the CLO. See for instance the marketing materials below focusing on a core range of groceries, where each of Aldi and Lidl compare their offering and prices to that available at other LGRs. See also the response to Question 1(a) and (b) below.





16. Third, Aldi and Lidl have an integrated wholesaling function that purchases directly from grocery suppliers¹⁵, and their designation since 2019 as a Designated Retailer under the Groceries (Supply Chain Practices) Market Investigation Code of Practice (**GSCOP**)¹⁶ strongly supports that conclusion. If Aldi and Lidl were not purchasing directly from grocery suppliers, or comprised small purchasers only, there would be no legal basis or need for the Groceries Code Adjudicator to regulate their treatment of grocery suppliers under the provisions of GSCOP. In any event, given that both GSCOP and the CLO originate from the same 2008 Groceries Market Investigation (the **Investigation**), it is already materially anomalous that Aldi and Lidl are designated under one of the remedies found to be required at the conclusion of that Investigation to promote and safeguard competition in the UK groceries market, but not the other.

17. In addition, historically, a delineation was established between “LADs” and the “traditional four” retailers on many grounds, including larger SKU counts, and the existence of instore fish, meat and delicatessen counters, bakeries and pharmacies. However, this distinction has become less clear cut over time. Many of the existing LGRs have recently taken steps to reduce SKU counts and eliminate instore counters and pharmacies as a response to rising cost pressures.¹⁷ Accordingly, many of the features once indicative of a “full stop shop” or “LGR” are arguably no longer appropriate or reflective of market realities.

¹⁵ Article 3(4)(c) of the CLO.

¹⁶ See here: <https://www.gov.uk/government/publications/groceries-supply-chain-practices-market-investigation-order>

¹⁷ See for instance: <https://www.thesun.co.uk/money/34672114/supermarket-closes-butcher-fish-counters-major-change/>; [https://meatmanagement.com/news/morrisons-plans-to-close-35-meat-counters-as-365-roles-at-risk/84613.article#:~:text=Topics%20*%20Morrisons.%20*%20Retailing.%20*%20Supermarkets](https://meatmanagement.com/news/morrisons-plans-to-close-35-meat-counters-as-365-roles-at-risk/84613.article#:~:text=Topics%20*%20Morrisons.%20*%20Retailing.%20*%20Supermarkets;); <https://www.theguardian.com/business/2020/feb/25/tesco-jobs-at-risk-bakeries>; <https://cpe.org.uk/our-news/morrisons-in-store-pharmacy-sales-are-yet-another-loud-warning-signal-for-government-and-the-nhs/>.

18. In today's trading environment, it is the market share of each of Aldi and Lidl that is particularly indicative of the importance of their designation under the CLO for reasons for fairness, equality of treatment and to create a level playing field. Both retailers have substantially increased their national market shares since the analysis conducted in the Investigation, and from which the CLO originated. At that time, Aldi was reported to hold a national share of 1.4% and Lidl held only 1.3%¹⁸, collectively accounting for less than 3% of the total UK groceries market. Now, Aldi's share is 10.6% and Lidl's is 8.3%, making them the fourth and sixth largest grocery retailers in the UK respectively, with a combined share close to 20%.¹⁹ Aldi and Lidl are each already larger than three of the seven LGRs currently designated under the CLO, namely Waitrose, Co-op and M&S, and Aldi is also larger than Morrisons. Their market position is compelling evidence that customers regard Aldi and Lidl as close substitutes or alternatives for grocers already designated under the CLO, in terms of price, range and location.²⁰ Aldi and Lidl each exert a significant competitive constraint on LGRs and other retailers, and accordingly their behaviour has the potential to materially impact competition in the UK grocery market. In such circumstances, it is not rational, reasonable, consistent or proportionate for the CMA to maintain a designation regime that applies to retailers with a smaller market presence or competitive significance than Aldi and Lidl, whilst excluding Aldi and Lidl themselves. Their continued non-designation gives rise to an unjustified – and at worst, arbitrary – inconsistency in regulatory treatment. Designation of Aldi and Lidl is therefore necessary to ensure fairness, equality of treatment and a level playing field to facilitate robust competition across the UK grocery market.

Question 1(a): Do Aldi and Lidl offer a range of groceries that is significantly more limited than that offered by the Large Grocery Retailers?

19. For the reasons described below, Iceland does not consider that the range offered by Aldi and Lidl is “*significantly more limited*” than that offered by other LGRs.
20. Clearly, and as described above, Aldi and Lidl have more than quadrupled the quantitative number of items in their respective product ranges over the last decade. Each now offers customers a range of more than 4500 products, clearly covering “...*food (other than that sold for consumption in the store), pet food, drinks (other than those sold for consumption in the store), cleaning products, toiletries and household goods.*”²¹

¹⁸ See: Appendix 3.1 of the Investigation Report, available here:

https://webarchive.nationalarchives.gov.uk/ukgwa/20140402235445mp/http://www.competition-commission.org.uk/assets/competitioncommission/docs/pdf/non-inquiry/rep_pub/reports/2008/fulltext/538_3_1.pdf

¹⁹ Kantar data for the 12 weeks to 22 March 2026.

²⁰ It is also pertinent that in recent analyses of the grocery market, the CMA itself has sought information from a wider range of retailers than the LGRs, (e.g. in the 2023 Grocery Profitability Assessment entitled “*Competition, choice and rising prices in groceries*” (the **Profitability Assessment**) the CMA sought information from 11 retailers, including Aldi and Lidl to assess the effectiveness of competition in the UK grocery market). See:

https://assets.publishing.service.gov.uk/media/64b80adaef5371000d7aeefb/Competition_choice_and_rising_prices_in_groceries.pdf See also para 14, as well as Figure 3 and 4 above.

²¹ The definition of “Groceries” in the CLO.

21. Whilst this growth in range volume is important, it is our view that the *number* of grocery products offered by a retailer is not necessarily determinative of competitive influence; and thus is not a reliable proxy to determine – in and of itself – the question of designation under the CLO. A retailer does not become competitively significant simply because it increases the number of products in its range. In our view, the more pertinent question to assess competitive significance in the context of potential designation under Article 3(4)(b) of the CLO, is whether a retailer offers a *full and functional set of the most commonly purchased household grocery essentials*, that would enable a customer to complete a weekly shop to satisfy basic, everyday needs?²² Indeed, it is also not relevant to compare the *number* of items in Aldi and Lidl’s product range vs that offered by the LGRs, to gauge designation: the test for designation is whether a potential designee offers a “*full range of Groceries*”, and not whether it offers the same or a similar number of products as that offered by others. Effective competition requires the existence of multiple retailers that each offer customers meaningful and compelling choice in relation to a core range of essential household groceries – it is in these circumstances that a customer can and may switch part or all of their weekly shop between competing retailers. It is this threat of actual or potential switching between retailers which generates and influences effective competition in the UK market. This appears to align, for instance, with the CMA’s analysis in the 2023 Grocery Profitability assessment which stated²³:

“Retailers closely monitor competitors’ prices, and aim to stay competitive with rivals, particularly for the most commonly purchased items, with a view to sustaining and increasing sales volumes. Given the number of retailers and items in question, this overall approach manifests itself in a range of different pricing strategies.

“Consumers are increasingly prepared to shop around to find the best prices, and lower-priced retailers have been successful in winning market share.” (emphasis added)

22. Iceland contends that Aldi and Lidl do make available a core range of essential groceries to their customers – even according to their own public statements. In particular:

- a. Lidl’s website states²⁴:
 - i. *“Discover our range of award-winning food, including everything from seasonal fruit & veg, to our responsibly sourced meat and seafood. We also offer a wide range of frozen foods, food cupboard essentials and fresh bakery items”.*
 - ii. *“We offer a range of household essentials, from household cleaning products and beauty products to pet food and baby care products.”*

²² We consider this to be consistent with the definition of “Groceries” in the CLO which contemplates, food, pet food, drinks, cleaning products, toiletries and household goods to comprise “Groceries”.

²³ See paragraph 3.40 of the Profitability Assessment.

²⁴ See: <https://www.lidl.co.uk/c/our-products/s10023093>

- b. Aldi's website states:
 - i. "Stock up on your daily essentials with our extensive range of fresh goods".²⁵
 - ii. "Feast your eyes on our huge range of tasty groceries packed full of freshness from Britain's Cheapest Supermarket".²⁶

23. There has been a significant convergence between the key features / offerings of Aldi and Lidl vs "legacy grocers" over time, and the significant growth in their market share since 2010 is indicative of the fact that both Aldi and Lidl continue to attract and retain customers. Indeed, Aldi and Lidl would not have been able to achieve such growth unless their product range was in fact viewed by customers to comprise a suitable alternative for that made available by the LGRs. On this basis, Iceland does not consider the range offered by Aldi and Lidl to be "significantly more limited" than that offered by LGRs.

Question 1(b): Do Aldi or Lidl offer their products at a lower price than Large Grocery Retailers?

24. Price is not referenced in the designation criteria set out in Article 3(4) of the CLO, and thus ought to have no bearing on the question of designation as an LGR under Article 3.

25. In fact, the LGRs already designated adopt a wide and varying range of business models and pricing strategies. There has been no suggestion to date that pricing strategy or price position is determinative of competitive significance for the purposes of CLO designation. It would be arbitrary to suggest that that ought to be the case now.

26. Whilst the definition of "LAD" means a "Grocery Retailer which sells a significantly more limited range of Groceries than a Large Grocery Retailer at a low price", it is noteworthy that:

- a. First, the legacy factors which previously distinguished "traditional grocers" from "discounters" (e.g. instore pharmacies, bakeries, fish, meat and delicatessen counters) are less clear cut now than was the case when the CLO was first enacted.
- b. Second, for the reasons above, the product ranges offered by Aldi and Lidl are comparable to those offered by LGRs in relation to a core range of essential groceries, that are most relevant to customers and would best enable customer switching between competitors.²⁷
- c. Third, many of the LGRs operate price match schemes whereby they ensure the prices of their household essentials do not exceed the price of the equivalent

²⁵ See: <https://www.aldi.co.uk/products/fresh-food/k/1588161416978050>

²⁶ See: <https://www.aldi.co.uk/groceries>

²⁷ Indeed, there have been several attempts to mimic core product ranges in packaging and presentation to induce customer switching, which have become the subject of well-documented trademark claims, which need not be listed here.

product available at Aldi and/or Lidl.²⁸ This suggests that (i) Aldi and Lidl compete closely with other retailers, particularly in relation to price of the most commonly purchased essentials; and (ii) household essentials are the most pertinent category of grocery products that drives switching. These price match schemes have the effect that the price of essential items is often the same or similar at Aldi and Lidl vs other LGRs.

27. Importantly, the fact that different retailers offer differentiated shopping experiences to their respective customers should not be a factor that materially impacts the question of designation under the CLO. It is widely recognised that competition in the grocery market is impacted by many factors, including price, location, service, convenience, quality and range. For instance, in paragraph 3.8 of the Profitability Assessment the CMA recognises that (emphasis added):

- a. *“Tesco, Sainsbury’s, Asda and Morrisons are the major supermarkets and pitch themselves as offering something to all demographics. They aim to stay competitive with the discounters on a number of key lines and offer – to slightly varying degrees – a wide range of products, with tens of thousands of individual stock-keeping units.”*
- b. Waitrose and M&S *“...are positioned at the higher end of the market, aiming to charge a price premium based on quality...”*
- c. Aldi and Lidl *“..offer much smaller ranges than the major supermarkets and compete on a low price offering with few frills and few well known brands, though they aim to match or exceed the quality of the major supermarkets on their own-label products”*
- d. *“Co-op is more convenience-focused with, in general, smaller shops serving a local area”.*
- e. *“Iceland is positioned at the lower cost end of the market, specialising in frozen foods and promotions on major brands”.*
- f. *“Ocado is an online-only retailer and positioned towards the higher end of the market....Ocado aims to offer a very large range of products.... and to compete on quality factors such as availability of delivery slots and few substitutions”.*

28. From the above, it is clear that different retailers flex their focus in a way that they consider will best attract and retain customers. But they are all – despite these nuances – functionally part of the same market. Collectively, these different experiences ensure that customers can choose how and where they want to shop. Any barrier (not least where a store can locate) that limits this choice can have the effect of diluting competition on a range of metrics in the UK grocery market.

29. In addition, and for completeness only, Iceland does not consider there to be any tenable argument or suggestion that Aldi and Lidl have been able to establish their price position

²⁸ See for instance: <https://www.sainsburys.co.uk/gol-ui/events/aldi-price-match>; [https://www.tesco.com/groceries/en-GB/zone/aldi-price-match?srsId=AfmBOopw8vUpq5ootL3ieRGRqhX_uSPymfYyrJWONmKglFE8Tt9LYa](https://www.tesco.com/groceries/en-GB/zone/aldi-price-match?srsId=AfmBOopw8vUpq5ootL3ieRGRqhX_uSPymfYyrJWONmKglFE8Tt9LYa;); <https://www.coop.co.uk/products/aldi-price-match> and <https://my.morrisons.com/price-match/>.

through their non-designated CLO status. As above, many LGRs can and do compete closely with Aldi and Lidl on price. In addition, non-designation of Aldi and Lidl enables each of them to act in a way that forecloses *all* other grocery retailers – both LGRs and others, such as Iceland, irrespective of their pricing strategy or position – from accessing local sites suitable for grocery retailing. Such foreclosure could have a direct negative impact on local communities, in particular:

- a. It may have the effect that customers are inhibited from exercising “local” freedom of choice in relation to grocers. Co-location of multiple grocers in the same retail park or town centre, for instance, enables customers to split their shop between retailers, without incurring additional travel costs. Any action which prevents the co- or close location of competing retailers is likely to be felt particularly acutely by price-sensitive and/or vulnerable customers who are less able to travel due to factors such as cost or disability.
- b. It creates the conditions in which Aldi and Lidl could potentially implement differential pricing strategies to raise local prices to supra-competitive levels, given the absence of local competitive constraint; and
- c. It may have a detrimental impact on the development of the high street and retail parks by limiting the pool of potential tenants, with a knock-on adverse impact on both landlords and local employment.

30. Foreclosure of this nature could adversely impact consumers – particularly the most vulnerable consumers – effective competition and fair dealing businesses across the UK grocery market.

Question 1(c): What do you consider to constitute a full range of Groceries?

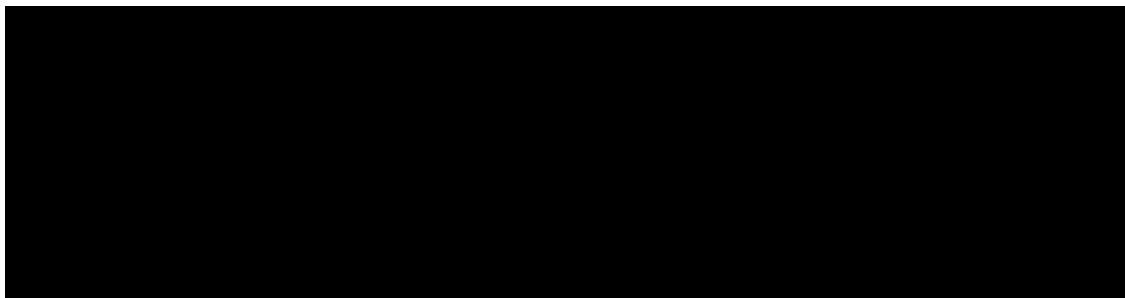
31. See our response to Question 1(a) above.

Question 1(d): Do you consider that Aldi or Lidl stock a full range of Groceries?

32. Yes. See our response to Question 1(a) above.

Question 2: Has there been, or could there be, any impact on competition or to consumers from Aldi and Lidl remaining outside the scope of the Order? We are particularly interested to hear of any examples where retailers have been unable to open a grocery store because Aldi or Lidl are not designated under the Order.

33.



34. Clearly, Iceland’s inability to access a site or retail development could have a direct and profound negative impact on the local community, and some of these adverse outcomes

are described in the response to Question 1 above. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Section C: Concluding Remarks

36. Iceland trusts this is helpful to the ongoing Consultation, and looks forward to the outcome.

37. Please note that information highlighted in yellow in this response is confidential to Iceland.

Yours sincerely,

Iceland Foods Limited