store would draw its trade, adding up to the store turnover of £10.45m (100%) at the foot of the columns. We acknowledge that the new Lidl store would draw some of its trade from residents living outside the catchment area. However, many of these non-catchment area residents will already be shopping in existing Ledbury foodstores, particularly Aldi. Their trade diversions are already accounted for in the table. For example, a resident of Newent (outside the catchment area) who currently shops at Aldi Leadon Way, but switches to the new Lidl store, is currently accounted for in the table as part of the substantial trade diversions from Aldi (£4.68m 44.8% of Lidl's trade). In terms of Rapleys' methodology, the 15% 'inflow' estimate can only represent the proportion of the Lidl store trade that is drawn from non-catchment area residents <u>who currently visit shops other than in Ledbury, Hereford City and Ross-on-Wye</u>. In the interests of clarity, we have labelled this 'Stores Elsewhere' in Table JW2.

73. The 'Stores Elsewhere' category would also include any <u>catchment area residents'</u> trade currently attracted to stores other than in Ledbury, Hereford City, and Ross-on-Wye that is attracted to the new Lidl store. This would for example include a Ledbury resident currently visiting the Lidl store in Malvern, but who switches to the new Lidl store in Ledbury.

74. The issue that is required to be addressed is whether Rapleys allowance of 15% for 'inflow' is reasonable (having identified above the trade flows this represents) The nearest centre, some 14 kms away is Great Malvern. It is a larger centre with a wider range of shops, including Waitrose, Sainsbury's Local, Tesco Express, and the Co-Op in the town centre. Malvern Retail Park, approximately 4 kms to the north-east of the town, contains a Morrisons store as well as a wide range of comparison stores, including M&S, Boots and Matalan. Some 3 kms to the north east of the town is a freestanding Lidl store. Because of the good range of shopping facilities in Great Malvern, including a Lidl Store, it seems unlikely that there would be significant number of Malvern residents who would be attracted to the new Lidl store in Ledbury.

75. There could be some additional trade attracted to Ledbury from residents within the Newent rural area to the south of Ledbury. Newent town (some 15 kms to the south of Ledbury) has a population of approximately 5,000. It has limited shopping facilities, but they do include Co-Op and Nisa foodstores. However, the much larger centre of Gloucester City lies approximately 15 kms to the south east of Newent (similar to the distance to Ledbury), and the majority of residents' trade outflow from the Newent area will therefore be to Gloucester. Despite this, we accept that some non-catchment residents from the Newent area may be currently visiting Ledbury and that the new Lidl store could increase the number of these visitors. However, because there is already an Aldi discount foodstore at Leadon Way, we do not believe that the amount of additional trade inflow from the Newent area would be large.

76. We do not have any survey data providing actual information on existing trade inflows to Ledbury from the Malvern or Newent areas. In the context of the Lidl application/appeal at Ross-on-Wye, we have seen information provided by Rapleys showing a small amount of leakage from residents of the NEMS Study Area as a whole (Herefordshire County) to Malvern and Newent shops. However, having considered the matter carefully, we have not found evidence to support Rapleys' estimate of trade diversions from stores elsewhere to the proposed Lidl store being as high as 15% of the store's turnover.

<u>*JWP Proposed Store Trade Diversion Estimates and Trade Impact*</u>

77. In table JW3 of Appendix 2 we have set out our estimates of the likely trade diversions that would arise from the proposed Lidl store based upon the Rapleys methodology. We have allowed for 10% of the Lidl store turnover to be drawn from 'Stores Elsewhere' (Rapleys 15%). We have retained the Rapleys' trade draw figures from Hereford City and Ross-on-Wye shops. We have reduced the proportion of the store's trade draw from Aldi Leadon Way to approximately 35% (Rapleys approximately 45%), and increased the proportion from Tesco Station Road to approximately 26% (Rapleys approximately 23%). We accept that the major trade diversions and impact will be from these two stores, because they have the most similar offer to the proposed Lidl store. However, in our opinion Rapleys estimates of the proportion of the Lidl store turnover draw from Aldi Leadon Way is unrealistically high.

78. A characteristic of Ledbury is that the principal large foodstores are in edge-of-centre and out-of-centre locations. Foodstore representation in the town centre is smaller convenience foodstores and

specialist traders. We accept that, because of the limited scale of foodstore representation in the town centre and the specialist nature of some shops, the proportion of Lidl's trade drawn from the town centre will be limited. Rapleys has allowed for only 2.3% of the Lidl's turnover to be from town centre convenience shops. We think this is unrealistically low and have allowed for just under 8%.

79. Estimates of the proportion of the Lidl store drawn from existing stores, translate directly into trade impact on those stores. The Rapleys and JWP trade impact estimates are set out in the final columns of Tables JW2 and JW3. We have also summarised the respective findings in Table A below. The most significant difference between us is a significantly higher impact on 'town centre shops' approximately 14% (Rapleys approximately 4%) and 'town centre / edge-of-centre combined' approximately 20% (Rapleys approximately 13%).

Table A Trade Diversions and Trade Impact 2025

	Trade Diversions £m		Trade Diversions %		Trade Impact %	
	Rapleys	JWP	Rapleys	JWP	Rapleys	JWP
Town Centre Shops	**£0.24m**	**£0.8m**	**2.3%**	**7.7%**	**4.3%**	**14.3%**
Co-Op, New Street	£0.52m	£1.0m	5.0%	9.6%	7.8%	15.0%
Tesco, Station Road	£2.35m	£2.76m	22.5%	26.4%	22.1%	25.9%
Town Centre / Edge-of-Centre	**£3.16m**	**£4.66m**	**30.2%**	**44.6%**	**13.4%**	**19.8%**
Out-of-Centre (Aldi)	£4.68m	£3.7m	44.8%	35.4%	39.7%	31.4%
Stores Elsewhere inc. Hereford City & Ross	£2.61m	£2.09m	25%	20%		
Total	£10.45m	£10.45m	100%	100%		

Vitality and Viability of Ledbury Town Centre

80. The health and vulnerability of an affected centre is an important consideration when assessing trade impacts upon the centre. Because of COVID 19, Rapleys has not been able to inspect the town centre and has provided a desktop assessment of the vitality and viability of Ledbury, which is set out in paragraphs 6.10-6.19 of the RA.

81. The assessment, based on Experian Goad (March 2017) and Co Star Information, focuses on representation by retail and service uses, and vacancies in town the centre. Information on existing uses is set out in Table 6.1 of the RA. Over half of units in the town centre are shown as comparison retail and over one quarter as service uses. Convenience retail represents only 12% of total units. Vacant units represent 6.7% of total units (which is noted as being below the national average for centres).

82. Rapleys conclude (RA 6.18):
"Ledbury Town Centre performs well with regard to indicators of vitality and viability, with a good mix of uses, good accessibility by all means of transportation, a high quality environment and a low perception of crime. Overall, the centre appears to be functioning well as a Town Centre as it serves residents adequately."

83. We visited the town centre on Monday 24th August. As we expected, the effects of the COVID 19 restrictions were evident with limitations on access to shops and food and drink establishments. There appeared to be additional vacancies, mostly in Bye Street and New Street, but it was not always easy to judge which were temporary only with the intention of reopening when restrictions

are further eased. We noted that the principal convenience traders previously observed in the town centre continue to be present, including One Stop, Spar, Greggs, and independent butchers, bakers, fruit and vegetable, and wine stores. Outside the town centre Aldi was being well used, as was Tesco in Station Road. However, the Co-op in New Street was relatively quiet, as were the One Stop and Spar stores in the town centre.

84. We believe our comments made at the time of our previous visits to the town centre in 2016 in connection with advice to the Council remain relevant:

"The Town Centre is relatively well provided for with small convenience shops, a number of which are independents with a distinctive offer. Examples of the latter include organic produce and butchers' shops offering products not found in supermarkets. One of the distinctive features of Ledbury is the vitality and attractiveness of the Town Centre with retailing, including convenience shops, making a strong contribution.

The largest units are the two grocery stores, Spar in High Street and One Stop in Homend each of which has a sales floorspace of approximately 200 sq.m. Other convenience shops include butchers, bakers (including Greggs), fresh fruit and vegetables, organic produce, delicatessen, etc."

85. The Neighbourhood Plan makes the following comments in respect of the town centre:

"Ledbury has a thriving centre made up predominantly of independent shops, food outlets, services and pubs. A residents' survey undertaken for the Town Plan showed that over 70% do their main food shopping in Ledbury; and a visitor survey showed that over 90% value the variety of shops. The retail area is focused along the Homend and High Street with secondary provision on intersecting streets. Local butchers and greengrocers, supplemented by twice weekly markets, provide fierce competition to the three supermarkets which will add to the competition in that sector.

There are a number of specialist shops in and near Ledbury that attract visitors from farther afield and which have also created thriving online business.

Thus, Ledbury has a sound base upon which to expand its retail business, both as a by-product of its tourism and by enhancing its reputation as a centre for specialist shopping. There is a need to retain a balance of type of outlet and to continue to provide support to independent enterprises.

The shopping areas have evolved over time, as some shops have closed down. Meanwhile, excellent new ventures have opened in the centrally located mews areas. This requires a repositioning of the retail boundaries of the town to reflect current use and to avoid sprawl. It will be important to contain the small-scale retail interest within a reasonable distance of the three main town car parks, so that easy access for shoppers and visitors is maintained."

86. The special character and attractiveness of Ledbury town centre is evident from the above findings. However, the COVID 19 pandemic is having a major impact on retailing and town centres nationally, and the possible implications for Ledbury need to be considered. In addition to the immediate effects of the lock-down, there may be some retailers and food/drink businesses that are permanently lost from the 'High Street'. Also, it remains to be seen how far shoppers, who have experienced enforced use of direct delivery services, will revert back to 'High Street' visits in person.

87. It is possible that post-COVID 19 Ledbury might benefit from some residents shopping locally, rather than travelling to centres elsewhere. However, this has to be set against greater use of the internet generally for shopping and, at least in the short term, a reduction in visitors.

88. In summary, although the special character of Ledbury is a strength, the town centre will not be immune from the pressures facing the 'High Street' generally, and it is therefore likely to be more vulnerable to adverse effects from trade diversions than would have been the case pre-COVID 19.

Interpretation of Impact

89. In terms of national (NPPF) and local (Herefordshire Core Strategy) planning policy requirements, trade impact on the 'town centre' is of most direct relevance. In Ledbury two of the principal foodstores, Tesco Station Road and the Co-Op New Street, are on the edge of the town centre, but in our view these stores play an important role in supporting the vitality and viability of the town

centre. In our view, it is therefore relevant to have regard to the effect of the proposed Lidl on these 'edge-of-centre' stores, in addition to the direct impact on the town centre.

90. Estimates of trade diversions and trade impact are based on informed judgements on the scale and nature of the proposed new facility, existing shopping patterns, and the role, function and vulnerability of affected centres. Being dependent on a range of inputs, the impact estimates can only be broad-brush. In this case, there are particular difficulties brought about by COVID 19 and the uncertainties as to how this has, and will continue, to impact upon the town centre.

91. The quantitative trade diversion and impact figures that we have provided above are our best estimates, based on the information that we currently have. A balanced judgement has to be made as to from which existing facilities the proposed Lidl store would draw its trade. The total store trade has to be accounted for, i.e. if it is considered that diversions from some stores are unreasonably high and should be lower, then an equivalent (higher) amount of turnover must be diverted from other stores. In this case we believe that Rapleys estimates of trade diversions from shops outside the County 'Stores Elsewhere' (15% of Lidl turnover) and Aldi Leadon Way (45% of Lidl turnover) are unreasonably high, and that as a result trade diversions from town centre and edge of-centre stores have been underestimated.

92. We have estimated a trade impact on town centre stores of approximately 14% and on town centre / edge-of centre stores combined of approximately 20%. We believe that this scale of trade diversions on town centre and edge of centre convenience shops is potentially damaging for the future viability of the town centre, particularly in the current uncertain circumstances caused by COVID 19.

93. Although comparison shops and services play the dominant role in supporting the vitality and viability of the town centre, a feature of Ledbury is the presence of independent specialist shops selling both convenience and comparison goods. Convenience goods shops play an important role in providing a balanced offer in the town centre both for residents and visitors. This balanced offer is an intrinsic part of the character and attractiveness of Ledbury town centre (in contrast with some historic town centres, where visitor-oriented gift / antique shops etc, dominate the centre).

94. We accept the benefits for Ledbury residents of attracting new retail investment into the town. However, in our opinion, for a town of its size Ledbury has a reasonable range of foodstores, and the recent introduction of Aldi has already widened the range to include a 'discount offer. The proposed Lidl would be in a prominent location, but not well linked to the town centre and so would not encourage spin-off trade for town centre shops and services.

95. The conservation status of the town centre is also a consideration to which some weight should be attached. The economic viability of many historic buildings in the town centre is dependent upon the retail and service uses. The impact figures that we have identified indicate some erosion of footfall in the town centre. We have referred above to the importance of convenience shops in providing a balanced retail offer in the town centre. A weakening of the town centre convenience retail offer would threaten continuation of this balanced retail offer, which in our view contributes strongly to the character of the conservation area.

JWPlanning
28 August 2020

Appendix 1

Extract from Planning Committee Report 14 September 2016

Proposed Extension to Existing Factory and Aldi Foodstore at Leadon way, Ledbury

Application P/160606/F

Sequential Testing

6.6 It is not considered that there are any suitable sites within the Town Centre.

6.7 In terms of edge-of-centre sites, when dealing with the aforementioned historic application (N113052/F) the Local Planning Authority considered that the sequential testing was not robust. Certainly, at that time, it was considered that the Lawnside site off Bye Street had not been appropriately considered. That was not to state that it was a suitable and available site. At that time it was considered that a supermarket operator may consider the possibility of a land assembly (if the various parts of the site were available) and redevelopment. However, integral to such a scheme would have been the relocation and/redevelopment of the existing leisure centre (i.e. swimming pool and gym facility operated by Halo). This is because of the relatively central location of the existing leisure centre within the wider Lawnside site. At that time there was a degree of uncertainty surrounding that facility due to its physical condition and lack of space. There was concern over the stability/condition of the roof structure; the age and condition of the changing facilities and the lack of space was restricting the ability of the management to generate income to continue the sustainability of the facility. However, circumstances have changed in that the decision has been made to retain, refurbish and extend the existing leisure centre. This scheme was detailed in planning permission 133503. The works on that project costing some £2.621m (including some £500,000 external funding from Sport England) commenced in June 2016. The works are scheduled to be completed in May 2017. The refurbished facility will need to remain in its current use for some 21 years.

6.8 In addition, during the aforementioned works to the Leisure Centre the former 'Youth Centre' located at the south-western corner of the Lawnside site is to be used by Halo as a temporary facility.

6.9 It is considered that the retention of the public parking that not only assists in serving the Town Centre but also the aforementioned leisure facility is of importance.

6.10 The Local Planning Authority is highly unlikely to support the loss of the listed building within the Lawnside site which is currently in use as a public house.

6.11 As a consequence of the above, it is considered that the amount of and size/shape of site that could potentially be assembled (if there were other willing landowners) would not be suitable for a supermarket of the nature proposed (even with flexibility in format). Indeed, there is no reason to believe that any part of the site, other than the former Ambulance Station may be available.

6.12 It is not considered that there are any other edge-of-centre sites that require investigation.

Appendix 2

Mixed-uses including Proposed Lidl Foodstore at Leadon Way, Ledbury Planning Application 190114

Tables accompanying JWP Report 28 August 2020

Table JW1

Ledbury Convenience Stores' Trade Draws

Main Food Shopping

	Study Area		Zone 5 Ledbury		Zone 1A Herefd City		Zone 1B Heref'd Rural		Zone 2 Kington		Zone 3 Leominster		Zone 4 Bromyard		Zone 6 Ross-on-Wye	
	Respondents	%	Respondents	%	Respondents	%	Respondents	%	Respondents	%	Respondents	%	Respondents	%	Respondents	%
Aldi Leadon Way	42	100	35	**83.3**	1	2.4	4	9.5	0	0.0	0	0.0	1	2.4	1	2.4
Tesco Orchard lane	45	100	40	**88.9**	1	2.2	3	6.7	0	0.0	1	2.2	0	0.0	0	0.0
Co-Op New Street	6	100	6	**100.0**	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0

Notes

Source NEMS Herefordshire Household Survey 2018

The findings are derived from the answers to Question 1 only 'At which one store do you do most of your main food shopping?'

Top-up Shopping

	Study Area		Zone 5 Ledbury		Zone 1A Heref'd City		Zone 1B Heref'd Rural		Zone 2 Kington		Zone 3 Leominster		Zone 4 Bromyard		Zone 6 Ross-on-Wye	
	Respondents	%	Respondents	%	Respondents	%	Respondents	%	Respondents	%	Respondents	%	Respondents	%	Respondents	%
Aldi Leadon Way	19	100	19	**100.0**	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Tesco Orchard Lane	10	100	10	**100.0**	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Co-Op New Street	12	100	12	**100.0**	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Local shops/Jenkins/One Stop/Spar	5	100	5	**100.0**	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0

Notes

Source NEMS Herefordshire Household Survey 2018

The findings are derived from the answers to Question 6 only 'At which one store do you do most of your top-up food shopping?'

Table JW2

Rapleys Estimates of Lidl, Leadon Way, Trade Diversions and Impact at 2025

	Store Turnovers	Diversion to Lidl		Residual Store Turnovers	Trade Impact
	£m	£m	%	£m	%
Ledbury					
One Stop	£1.49	£0.08	0.8%	£1.41	5.4%
Spar	£1.29	£0.08	0.8%	£1.21	6.2%
Other Stores	£2.81	£0.08	0.8%	£2.73	2.8%
Town Centre	**£5.59**	**£0.24**	**2.3%**	**£5.35**	**4.3%**
Co-Op	£6.66	£0.52	5.0%	£6.14	7.8%
Tesco	£10.65	£2.35	22.5%	£8.30	22.1%
Other Stores	£0.62	£0.05	0.5%	£0.57	8.1%
Edge-of-Centre	**£17.93**	**£2.92**	**27.9%**	**£15.01**	**16.3%**
Town Centre / Edge of Centre	**£23.52**	**£3.16**	**30.2%**	**£20.36**	**13.4%**
Aldi Leadon Way	£11.79	£4.68	44.8%	£7.11	39.7%
Out-of-Centre	**£11.79**	**£4.68**	**44.8%**	**£7.11**	**39.7%**
Total Ledbury	**£35.31**	**£7.84**	**75.0%**	**£27.47**	**22.2%**
Zone 1A Hereford Stores	£1.74	0.86	8.2%	£0.88	
Zone 6 Ross-on-Wye Stores	£0.58	0.18	1.7%	£0.40	
Stores Elsewhere (Inflow)		1.57	15.0%		
Total Outside Catchment		**2.61**	**25.0%**		
Total		**£10.45**	**100.0%**		

Source - Rapleys Retail Assessment, May 2020, Appendix 5 Table 6

Table JW3

JWP Estimates of Lidl, Leadon Way, Trade Diversions and Impact at 2025

	Store Turnover	Diversion to Lidl		Residual Store Turnovers	Trade Impact
	£m	£m	%	£m	%
Ledbury					
One Stop	£1.49	£0.20	1.9%	£1.29	13.4%
Spar	£1.29	£0.20	1.9%	£1.09	15.5%
Other Stores	£2.81	£0.40	3.8%	£2.41	14.2%
Town Centre	£5.59	**£0.80**	**7.7%**	**£4.79**	**14.3%**
Co-Op	£6.66	£1.00	9.6%	£5.66	15.0%
Tesco	£10.65	£2.76	26.4%	£7.89	25.9%
Other Stores	£0.62	£0.10	1.0%	£0.52	16.1%
Edge-of-Centre	£17.93	**£3.86**	**36.9%**	**£14.07**	**21.5%**
Town Centre / Edge of Centre	£23.52	**£4.66**	**44.6%**	**£18.86**	**19.8%**
Aldi Leadon Way	£11.79	£3.70	35.4%	£8.09	31.4%
Out-of-Centre	£11.79	**£3.70**	**35.4%**	**£8.09**	**31.4%**
Total	£35.31	**£8.36**	**80.0%**	**£26.95**	**23.7%**
Zone 1A Hereford Stores	£1.74	0.86	8.2%	£0.88	
Zone 6 Ross-on-Wye Stores	£0.58	0.18	1.7%	£0.40	
Stores Elsewhere (Inflow)		1.05	10.0%		
Total Outside Catchment		**2.09**	**20.0%**		
Total		**£10.45**	**100.0%**		