

# **JWPlanning**

## **Planning Consultancy Services**

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13 June 2016

Mr Roland Close  
Principal Planning Officer  
Herefordshire Council  
PO Box 230  
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HR1 2ZB

Dear Roland

### **Proposed ALDI Foodstore, New Mills Industrial Estate, Ledbury Planning Application P/160606/F**

This letter is in response to your e-mail of 10 June requesting our comments on material received from MRPP dated 10 June on behalf of Tesco. MRPP identifies three matters of concern – town centre impact; application of the sequential test; and loss of employment land. We respond on the first two issues below. As you are aware the third is outside our terms of reference.

#### **Town Centre Impact**

1. MRPP first comments on the turnover estimate used for the proposed ALDI store, which is based upon Turley's sales density estimate of £9,808 per sq.m. We have commented on this issue in our letter to you of 6 June and have little further to add. ALDI sales densities have risen significantly over recent years from around £5,000 per sq.m in 2010. The Turley estimate of £9,800 per sq.m recognises this growth. Published information on Company sales density is prone to change from year to year. Furthermore for individual operators there is known to be a wide variation of performance around the company average between stores.
2. It remains our view that even if the sales density estimate used for an ALDI store in Ledbury is slightly below the company average, this does not appear to us to be unreasonable, because the store is likely to be less busy than stores in more densely populated areas where many ALDI stores are located.
3. MRPP maintains that the proportion of the store turnover drawn from shops outside Zone 5 (Ledbury) estimated by Turley is too high. Turley's estimate of the amount of the proposed store turnover drawn from non-Ledbury shops is a matter on which we raised similar concerns in our letter to you of 13 April. Table JW3 in our earlier letter shows a Turley figure of 45% of the store turnover drawn from non-Ledbury shops. Our assessment (also shown in Table JW3) reduces this to 37%.

MRPP maintains that no more than 10% of the ALDI turnover would be drawn from non-Ledbury shops.

4. We explain the reasoning behind our revised estimate of the draw of the proposed from Ledbury and non-Ledbury shops in paragraphs 65-74 of our letter of 13 April. We do not reiterate this here. Although we agree with MRPP that Turley's estimate of the proportion of the proposed store turnover drawn from non-Ledbury shops is too low, we question whether it could be as low as 10%, proposed by MRPP. The introduction of an ALDI store would diversify the type of convenience facility on offer in Ledbury. There are existing ALDI stores in Hereford City (the City is a widely used destination for Ledbury residents) and Ross on Wye (which is relatively close-by). We believe therefore that the level of clawback would be greater than assumed by MRPP.
5. We accept MRPP's views on the significance of Tesco and the Co-Op edge-of-centre stores for Ledbury Town Centre.
6. Based on a higher ALDI store turnover and a much lower proportion of the store turnover drawn from Ledbury shops than estimated by Turley, MRPP estimates a trade impact on Ledbury Town centre convenience shops of -10.8%. This compares with figures that you have seen of -6% (Turley) and -8.8% (JWP). We have stated that we believe MRPP's trade draw assumptions in respect of non-Ledbury shops are unrealistically low. However, you may feel that in terms of quantitative trade impact you have before you a range of possible figures, which require to be considered as part of a wider judgement on the acceptability or otherwise of the application proposal.

## Sequential Approach

7. MRPP has drawn attention to information on the ALDI website which in respect of store site requirements states:

*"We prefer to:*

*Purchase freehold, town centre or edge of centre sites suitable for development (min. 0.8 acres)."*

8. There are of course a variety of situations that can arise in looking at potential sites in different locations, particularly in densely developed 'central' areas and where sites are not level. In particular we do not know what assumptions may have to be made in respect of car parking with a site area of 0.32 hectares only. It may be appropriate for you to raise this point direct with Turley, indicating that you need additional information to why they consider the minimum stated ALDI site area requirement of 0.32 hectares would not be acceptable in Ledbury.

Please contact me if you have any queries arising from any matters raised in this letter.

Yours sincerely

**James Williams**  
**JWPlanning**