

# *Planning Statement with Retail Statement*

Client: Aldi Stores Limited

Property: Land South of Pool Road, Newtown



# Contents

---

|   |           |
|---|-----------|
| <b>1. Introduction</b>                                | <b>3</b>  |
| <b>2. Description of Site and Surrounding Area</b>    | <b>5</b>  |
| <b>3. The Proposed Development</b>                    | <b>8</b>  |
| <b>4. Pre-Application Advice</b>                      | <b>14</b> |
| <b>5. Planning Policy Context</b>                     | <b>15</b> |
| <b>6. Retail Planning Considerations</b>              | <b>20</b> |
| <b>7. Planning Considerations</b>                     | <b>33</b> |
| <b>8. Conclusions</b>                                 | <b>37</b> |
| <b>Appendix 1 – Retail Need and Impact Assessment</b> | <b>38</b> |
| <b>Appendix 2 – Study Area Plan</b>                   | <b>39</b> |
| <b>Appendix 3 - Sequential Site Details</b>           | <b>40</b> |

# 1. Introduction

---

## 1.1 Introduction

1.1.1 JLL has been instructed by Aldi Stores Limited to prepare this Planning and Retail Statement in support of a full planning application for the erection of a new foodstore and associated development on Land South of Pool Lane, Newtown (the 'site'). The proposed development is described on the application form as follows:

'Demolition of existing buidings and erection of a foodstore (Use Class A1), car park, access and landscaping at Land South of Pool Lane, Newtown.

1.1.2 The planning application is submitted with the intention that the land be developed for a Use Class A1 retail foodstore, which will be occupied by Aldi Stores Limited ('Aldi' hereafter). This report therefore includes background information on the retailer, to help understand the specific format and retail use proposed. This background on Aldi as a retailer is considered to be particularly relevant to assessing the proposal against relevant planning policy.

1.1.3 The planning application is accompanied by the following supporting documents:

- Planning Application Form and Certificates (prepared by JLL);
- Design and Access Statement (prepared by The Harris Partnership);
- Transport Assessment (Prepared by Cameron Rose Associates);
- Preliminary Ecology Assessment (Prepared by Cambrian Ecology Ltd)
- Phase I Desk Study Assessment Report (Prepared by Brownfield Solutions Ltd)
- Phase II Geo-Environmental Assessment Report (Prepared by Brownfield Solutions Ltd)
- Drainage Assessment (Prepared by SWF Consulting Ltd)
- Noise Assessment (Prepared by Spectrum Acoustic Consultants)
- Pre-Application Consultation Report (Prepared by BECG)
- Demolition and Construction Management Plan (Prepared by CTM Management Ltd)
- Light Spillage Plan
- Planning Drawings (prepared by The Harris Partnership):
  - 2879NESW-100 Location Plan
  - 2879NESW-101 Existing Site Plan
  - 2879NESW-102 Demolition Plan
  - 2879NESW-103D Proposed Site Plan
  - 2879NESW-104B Proposed GA Plan
  - 2879NESW-105B Proposed Elevations

- 2879NESW-106A Proposed Roof Plan
- 2879NESW-107A Proposed Roller Shutter
- 2879NESW-108B Boundary Treatment Plan
- 2879NESW-109A Proposed Sub Station

## 1.2 Structure

1.2.1 This Planning Statement identifies and addresses the issues relevant to the consideration of the application submission, as follows:

- Description of Site and Surrounding Area – describes the physical characteristics of the planning application site and its immediate surroundings.
- Planning History of the Site – sets out the planning history for the site
- Proposed Development – provides a description of the proposed development
- Pre-application Discussions – Describes the pre-application discussions with officers at Powys County Borough Council
- Relevant Planning Policy – describes the planning policies which are relevant to the proposed development.
- Retail Assessment – addresses need, the sequential test and impact assessment.
- Relevant Planning Considerations - provides an assessment of the planning application proposals against the relevant planning policies and material considerations.
- Conclusions - sets out the conclusions of this statement.

## 2. Description of Site and Surrounding Area

---

### 2.1 The Application Site

2.1.1 The planning application site extends to approximately 0.75ha (1.75 acres) and is located off Pool Road, approximately 900m east of Newtown Town Centre. The Site and surrounding context are illustrated on the 'Site Location Plan', which have been submitted to accompany the planning application.

### 2.2 Site Description

2.2.1 The application site is located within the administrative area of Powys County Council (Powys CC) and is situated north of Pool Road which extends west towards Newtown Town Centre.

2.2.2 The site currently comprises of two existing Ford car showrooms (referred to as 'Greenhous' and 'Transit Centre'), the forecourt and associated car parking. Quick Lane Type and Autocentre is located to the rear of the site. A low brick-built boundary wall runs along the northern and eastern boundary of the site. A palisade fence runs along the southern boundary of the site. Metal bollards form the majority of the western boundary.

2.2.3 The site has two existing access/egress points. The main access point is located along the northern boundary of the site and is directly off Pool Road. The second access point is located along the western boundary of the site, off Wern Ddu Lane.

2.2.4 The application site is located inside Newtown's settlement limit, but outside of the town centre and main retail area, as defined in the Development Plan.

### 2.3 The Surrounding Area

2.3.1 The land uses immediately surrounding the site comprise a mixture of large retail units, an industrial estate and recycling centre.

2.3.2 Pool Road bounds the site to the north, beyond which extend playing fields which are associated with Newtown Rugby Club and Newtown Cricket Club. The road running through Dyffryn Industrial Estate abuts the eastern boundary of the site, beyond this extends buildings associated with Dyffryn Industrial Estate. To the south of the site is the SP Manweb Plants and Potters recycling. Wern Ddu Lane abuts the western boundary of the site and beyond this is W M Morrisons Petrol filling station and Morrisons supermarket.

### 2.4 The Wider Area

2.4.1 The wider area of Newtown extends west of the site and incorporates the town centre, which extends along New Road and north along Shortbridge Street. The site is located approximately 1km east of the identified 'Town Centre Area'. There are residential pockets throughout Newtown, however, the most significant residential area is concentrated to the north of the River Severn which is accessed via the B4568 'Cambrian Way' bridge.

2.4.2 Within Newtown there are four existing supermarkets. These comprise of Morrisons (50m west of the site), Tesco (700m south west of the site), Iceland (2.2km west of the site) and Lidl (1.7km south west of the site).

2.4.3 The new 6.3km Newtown Bypass (A483), which runs to the south of Newtown, opened in February 2019. The bypass was introduced to ease significant congestion within the centre of Newtown. The bypass will draw away passing traffic, however, by locating adjacent to the Morrisons, the proposed Aldi store would promote more sustainable travel patterns and further encourage local trading patterns.

## 2.5 Access

2.5.1 The site is located off Pool Road, the main trunk road running through the east side of Newtown and into Newtown town centre. The newly constructed Newtown Bypass roundabout is located 1.2km west of the site.

2.5.2 Newtown is the largest town in the county of Powys and is well served by bus and train services. The closest bus stop to the site is located 430m south west of the site, along Pool Road. Services 71, T12 and X75 operate along this route offering regular services to Newtown Town Centre, Llangurig, Llanidloes, Machynlleth and Rhayader.

2.5.3 Newtown Railway Station is located 1.3km south west of the site and operates regular services to Shrewsbury, Aberystwyth and Birmingham New Street and Birmingham International along the Transport for Wales line.

## 2.6 Planning History

2.6.1 The original permission establishing the lawful use of the subject property and historic planning record are available on Powys Council’s online register

2.6.2 The available planning history which is considered most relevant to this Site is summarised in Table 1 below in chronological order. Powys Council do not appear to have a map search function for planning applications and therefore, while the below relevant applications have been identified, we are mindful that this list may not be exhaustive.

Table 1: Application Site Planning History

| Reference   | Proposal  | Decision and Date          |
|-------------|---|----------------------------|
| P/2015/0988 | Demolition of two dwellings and erection of commercial vehicle showroom, replacement valet bay facility and mess room and other associated works. | Approved 25 February 2016  |
| P/2016/0127 | Alterations to showroom to include the demolition of a section of the parts store.  | Approved 24 March 2016     |
| P/2016/0775 | Erection of advertisements x 8  | Approved 21 September 2016 |
| P/2016/0863 | Application for consent to display a variety of internally illuminated and non-illuminated signs (14 no.)   | Approved 9 November 2016   |

- 2.6.3 The site has been operating as a commercial unit since 2016. Previous to this, the eastern portion of the site was occupied by two residential dwellings (Erwfelen and Briars) and the Western portion of the site was occupied by a petrol filling station.
- 2.6.4 Within the 2016 Decision Notice for application reference: P/2015/0988 for the *'demolition of two dwellings and erection of commercial vehicle showroom, replacement valet bay facility and mess room and other associated works'* the use class of the commercial vehicle showroom is listed within the application form as 'other' we assume to be 'Sui Generis'.

## 3. The Proposed Development

---

### 3.1 Proposal

- 3.1.1 This Planning Statement is submitted to support a full planning application comprising the following:
- A food store (Use Class A1) (1,880sq. m Gross External Area; 1,804sq. m Gross Internal Area; 1,332 sq. m net sales area) to be operated by Aldi Stores UK Limited;
  - Associated car parking facilities comprising 104 dedicated spaces for the proposed foodstore. The car park will include six disabled, nine parent and child spaces, 5 staff parking spaces and 2 electric vehicle charging points. The car park will also comprise of 5 motorcycle spaces and 12 cycle spaces.
  - New Site Access and Egress– off Wern Ddu Lane, west of the site
  - New Egress only- off Dryffin Park Industrial Estate Park Road, east of the site
  - New Pedestrian Access – off Wern Ddu Lane, west of the site
  - New Servicing Access – off Dryffin Park Industrial Estate Park Road, east of the site
  - Servicing and Landscaping

### 3.2 Site Layout

- 3.2.1 The proposed site layout is informed by design parameters of the site, including the three abutting roads and the substation to the south of the site.
- 3.2.2 The proposed positioning of the foodstore allows for maximum visibility from Pool Lane.
- 3.2.3 The orientation of the foodstore allows the principal elevations to face the main vistas towards the site whilst pushing the service area away from the general public’s view and separate from the main car park. The proposed Aldi provides shop front glazing with an active façade treatment to the principal elevation. The store entrance is located along the western elevation, by way of an external lobby arrangement, and the shopfront glazing is located along the northern elevations taking advantage of the prominent view of the Aldi foodstore when travelling along Straight and giving customers direction in to the proposed store.
- 3.2.4 All new Aldi stores within Wales include bi-lingual signage inside the store (such as signage of produce and customer and staff facilities) and within the wider site (such as directional signage and store opening hours).

### 3.3 Store Design

- 3.3.1 The majority of properties in the surrounding area, which are predominantly brick built, or industrial units which feature metal style cladding as the primary material. Residential units utilise brick as the primary material. Therefore, a simple palette of materials and crisp contemporary style are proposed to complement the local area by way of introducing a modern addition to the local vernacular and immediate context.

3.3.2 The new Aldi store proposal utilises a combination of charcoal brickwork plinth, anthracite grey and metallic silver cladding, representing qualities of both the nearby retail properties and adjacent residential properties.

3.3.3 Additional details are set out within the Design and Access Statement prepared by the Harris Partnership, which accompanies the application submission.

### **3.4 Access**

3.4.1 Customers' access (and egress) to the development is proposed via a newly formed priority-controlled junction off Wern Ddu Lane.

3.4.2 A second egress point is provided on the eastern boundary off Dryffin Industrial Estate Park Road.

3.4.3 Service vehicles and staff parking access to the development is proposed via a newly formed priority-controlled junction along the eastern boundary of the site. The separate service area for delivery vehicles is provided to the east of the store, providing separation between customers and service vehicles and therefore reduces potential conflict.

3.4.4 Ample circulation areas for both customers within the car park and delivery vehicles in the service yard have been included to facilitate efficient and safe movement within the site.

### **3.5 Servicing and Deliveries**

3.5.1 As detailed above, delivery and service vehicles will access the separate store service area via the proposed access and egress point on the eastern boundary of the site.

3.5.2 Typically, Aldi stores receive 3-4 deliveries per day from its regional distribution centre (RDC). These can increase at peak seasonal periods. Deliveries would be carried out during:

- unrestricted hours, seven days per week.

3.5.3 Further deliveries include a fresh milk delivery each day; and a general waste collection once a week. All other waste is collected by Aldi's vehicles and returned as part of the normal delivery visits each day to reduce vehicle trips and utilise vehicles efficiently.

### **3.6 Car Park Layout**

3.6.1 The proposed Aldi foodstore will provide 104 car parking spaces. This includes: six disabled spaces; nine parent and child spaces; two EVCPs; Five Motorcycle spaces; and 5 staff parking spaces.

3.6.2 Cycle parking for up to 12 bicycles, in the form of 'Sheffield' type bicycle stands will be provided adjacent to the store entrance. It is expected that this will promote the use of cycling as a mode of transport by customers and employees of the site.

### **3.7 Landscaping and Boundary Treatment**

3.7.1 Proposed trees, native species and other landscaping are included to soften the appearance of the car park.

- 3.7.2 Materials have been carefully selected to highlight the routes through the car park, in particular, marked pedestrian crossing linking the store entrance. The scheme will have formal landscaping including a quality paved area beneath the entrance canopy which will further emphasise this area on arrival from the pedestrian crossing approaches to the store entrance. The formal entrance into the site is intended to have a scheme wide approach marking the arrival with clear directional signage for the key elements within the site.
- 3.7.3 Surrounding the northern boundary and the majority of the east and west boundary is a Timber Knee Rail. A 2.4m High Paladin Fence forms the majority of the southern boundary and screens the Aldi from the adjacent Recycling Centre. The dedicated servicing yard is screened from the customer parking area by a 2m High Close Boarded Timber Fence
- 3.7.4 The existing landscaping results in strong boundaries encompassing the site, this will be retained and made good where necessary. The submitted landscape drawing provides further details.

### **3.8 Sustainability**

- 3.8.1 Aldi is committed to achieving sustainable development across its estate. The business operates a detailed sustainability plan across all UK development and includes a range of measures including:
- Reducing energy usage;
  - Applying a heat recovery system within its stores which uses a refrigerant-to-air-heat-exchanger to heat the sales area of each store;
  - Using sustainable materials and construction methods; and
  - Reducing and managing waste.
- 3.8.2 The proposal will incorporate a heat recovery system to heat the proposed building. In order to minimise energy demand in stores, the appellant seeks to re-use and re-cycle any waste energy where possible. The greatest area to recover energy in the store is the 'Waste Heat' generated by the refrigeration system and this is recovered to heat the proposed building which would otherwise be discharged into the atmosphere. The waste heat is harnessed via a CO2 refrigerant lead heat recovery system that rejects the waste heat into a low temperature hot water heating circuit which in turn provides heat to an underfloor heating array. This system provides 100% (115,000 kWh per year) of the total building's heating demand. The heat recovery system has totally removed the need for an independent gas heating system. The underfloor heating system provides heat to the store with a high percentage of radiant heat, minimising the negative affect that the sales floor chillers have on the store heating.
- 3.8.3 Total energy consumption for a typical store is approximately 270,000 kWh per year. Heating provides approximately 40% of the proposed building's overall energy demand. The combination of reusable and renewable sources, circa 40% of energy, provide an excellent sustainable approach to the operation of the proposed building.

### **3.9 Design Out Crime**

3.9.1 The scheme has been designed with safety and crime prevention in mind. It adopts principles of secure by design wherever possible including:

- There are few areas where criminal activity could occur unobserved.
- Most of the car parking areas are overlooked from the frontage of the building and are readily visible from the surrounding roads, allowing a good level of natural surveillance.
- Cycle parking for customers will be close to the store entrance.
- New lighting columns will be positioned across the site which will have LED lights fitted to give a uniform luminance level to the car park and service area. Lights will be operated by a time clock and photocell override and protected with covers against vandalism.
- Bin stores will be fully enclosed in the bin cage to the service yard for the foodstore.
- Shopping trolleys are controlled on a coin operated system and will be secured at night to prevent theft and misuse.
- Planting and vegetation in vulnerable areas will be kept to a maximum height of 1m.

3.9.2 The Aldi building design also incorporates secure design features:

- Windows will have laminated double-glazed units.
- External security shutters over the entrance/exit doors out of hours.

3.9.3 Doors and windows are manufactured from steel with no visible ironmongery.

- An intruder alarm will be installed.
- The entrance to the store for customers is in an obvious position at the front, facing the car park.
- There are no recesses to the ground floor of the building exterior.
- There are no areas with access to the roof.

3.9.4 Further details are provided in the submitted Design and Access Statement.

### **3.10 Trading Hours**

3.10.1 Aldi's stores trade as follows:

- Monday to Saturdays 8am – 10 pm,
- Sundays 10 am – 6pm, (for a six-hour period)
- Bank Holidays 8am – 8pm (bank holidays are classed as normal trading days and are not restricted to Sunday hours).

### **3.11 Aldi Store Concept**

3.11.1 Aldi offers a modest sized supermarket range primarily selling its high quality, brand-matched products at heavily discounted prices. Awarded the 'Which? Best Supermarket' award for 2012, 2013 and 2015;

and ‘Best Supermarket’ for 2015 at the Retail Industry Awards. Most recently, Aldi has won the Grocer of the Year award at the Grocer Gold 2018 Awards. Aldi has become not only the leading discount operator, but an established presence in the UK market.

3.11.2 The majority of the products on offer are Aldi’s exclusive own brands supported by a small range of branded goods. This ensures highly competitive pricing for the customer. Each Aldi store carries the same range of up to 1,800 core lines, in stark contrast to a large Tesco or Asda store which will carry in excess of 50,000 at their larger stores. While Aldi’s business model is designed for efficiency in order to keep prices low, the quality of the own-brand products is exceptionally high and matched with the best brands. This is highlighted by the number of awards Aldi has received in recent years from established sources such as The Grocer, the Quality Food Awards, the Retail Industry Awards and the International Wine and Spirits Challenge.

3.11.3 Aldi does not provide a ‘one-stop-shop’ – with no facilities such as an in-store butchers, pharmacy, fishmonger or provision of tobacco products and stamps – and thus encourages linked trips with existing facilities. Rather than harm local trade, as the introduction of a large format supermarket operator may do, Aldi can promote the use of local businesses, keeping shoppers spend in the local area and promoting sustainable shopping patterns rather than travelling further afield. A representation of Aldi’s offer is set out below:

- Selection of fresh seasonal fruit and vegetable lines;
- Limited range of exclusively own label tinned, bottled and pre-packed groceries;
- Chilled and frozen products;
- “Specially Selected” range which offers premier quality, luxury foods hand-picked from around the world;
- Own label beers, wines and spirits;
- Pre-packed bread, morning goods and cakes;
- Everyday non-food household items e.g. toiletries and cleaning items;
- Special purchase products, twice weekly, non-food, limited availability, within the categories of textiles, leisure goods, electronics, DIY and home improvements.

### **3.12 Job Creation**

3.12.1 The development of an Aldi foodstore will typically create up to 40 jobs comprising full time and part time positions. A range of roles are required in Aldi’s stores including store managers, store assistants, caretakers and warehouse staff. Aldi provides a successful and highly regarded apprenticeship scheme and graduate scheme which provide extensive opportunities. As more stores open, Aldi is required to recruit and train additional area managers and distribution staff including delivery drivers and logistics staff. Thus, the benefits of a new store are significant to a local area and to the region.

3.12.2 Furthermore, Aldi pays above average wages at all levels within the retail sector and has introduced a new minimum rate for all UK staff which is higher than the national living wage. Aldi employees are the highest-paid compared with other national convenience retailers.

- 3.12.3 Additional employment opportunities will also be created for the local area through employment of local contractors and labour during the construction stage, plus further employment opportunities for ongoing maintenance of the site and landscaping.

## 4. Pre-Application Advice

---

- 4.1.1 A pre-application meeting was held on 6 August 2019 with Local Planning representatives to discuss the development, following which the council provided formal written pre-application advice on 13 August 2019.
- 4.1.2 The validation requirements for the full planning application were agreed as follows:
- Full Planning Application Forms;
  - Drawings
  - Design and Access Statement
  - Pre-application Consultation Report
  - Retail Assessment
  - Preliminary Ecology Survey
  - Traffic Assessment
  - Noise Assessment
  - Artificial Light Assessment (A Light Spillage Plan has been submitted)
  - Contaminated Land Risk Assessment (A Geo-Environmental Assessment has been submitted including a Phase 1 Assessment)
  - Waste Management Report (This is included in the Design and Access Statement; and Construction Management Plan)
  - Landscaping Plan and Boundary Treatment Plans
- 4.1.3 At the meeting the background and reasoning behind Aldi's decision to seek permission in Newtown was explained. Officers advised that they were comfortable with the principle of the development, subject to the key retail policy tests of Need, Sequential Test and Impact being addressed within the application submission.

## 5. Planning Policy Context

---

- 5.1.1 When determining any planning application, the relevant authorities (in this case Powys County Council) are under a statutory obligation as imposed by section 54A of the Town and Country Planning Act, repeated in Section 38(6) of the Planning and Compulsory Purchase Act 2004, to make their determination in accordance with the development plan, unless material considerations indicate otherwise.
- 5.1.2 In this instance the relevant development plan comprises the Powys Local Development Plan adopted April 2018. The Development Plan is supported by a range of Supplementary Planning Guidance adopted Wrexham County Borough Council. Planning Policy Wales (PPW) and the relevant Technical Advice Notes (TANs) are also a material consideration.

### 5.2 The Development Plan

#### *Powys Local Development Plan (2018)*

- 5.2.1 The Powys Local Development Plan consists of a Written Statement and the Proposals and Inset Maps and it sets out the Council's policies for the development and use of land in Powys. Together with national planning policy it will guide decisions on planning applications on all future development and land use planning within the Plan area during the Plan period.
- 5.2.2 The following policies are considered relevant to the application:

**Policy SP4** 'Retail Growth' sets out that to meet future retail needs over the Plan period, provision is made for up to 1,000m<sup>2</sup> of retail floorspace, of which 800m<sup>2</sup> would be convenience goods sales and 200m<sup>2</sup> would be comparison goods sales.

**Policy R1** 'New Retail Development' identifies Newtown as an Area Retail Centre. New retail developments should be of an appropriate scale and design to the settlement and in accordance with the settlement's role in the retail centre hierarchy. Proposals that would undermine the retail hierarchy will not be permitted.

**Policy DM1** 'Planning Obligations' sets out that planning obligations will be sought with applicants, where necessary.

**Policy DM4** 'Landscape' states that Development Proposals must not compromise the topography and patterns of features such as small hills and traditional field boundaries.

**Policy DM7** 'Dark Skies and External Lighting' states that development proposals involving external lighting will only be permitted when a lighting scheme has been provided that demonstrates that the lighting will not individually or cumulatively cause:

- Unacceptable levels of light pollution especially in the countryside.
- And unacceptable adverse effect on the visibility of the night sky.
- A nuisance or hazard to highway users including pedestrians, and local residents.

- An unacceptable disturbance to protected species. Policy DM13 – Design and Resources Development proposals must be able to demonstrate a good quality design and shall have regard to the qualities and amenity of the surrounding area, local infrastructure and resources.

**Policy T1** ‘Travel, Traffic and Transport Infrastructure’ sets out that transport infrastructure, traffic management improvements and development proposals should incorporate the following principal requirements:

1. Safe and efficient flow of traffic for all transport users, including more vulnerable users, and especially those making ‘Active Travel’ journeys by walking or cycling;
2. Manage any impacts to the network and the local environment to acceptable levels and mitigate any adverse impacts; and
3. Minimise demand for travel by private transport and encourage, promote and improve sustainable forms of travel including Active Travel opportunities in all areas.

**Policy T3** ‘Newtown By-pass’ sets out that the route of the Newtown by-pass is safeguarded and protected. The justification text confirms that the by-pass was needed to relieve congestion in the town and to improve the flow of traffic on the strategic routes through Mid Wales to the Midlands. Completion date is due in 2018.

### 5.3 National Planning Policy and Guidance

#### Planning Policy Wales (PPW) (Edition 10, December 2018)

- 5.3.1 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. It is supplemented by a series of Technical Advice Notes (TANs) Welsh Government Circulars, and policy clarification letters, which together with PPW provide the national policy framework for Wales.
- 5.3.2 The PPW sets out (paragraph 12) that the primary objective of planning is to contribute towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the wellbeing of Future Generations (Wales) Act 2015 and other key legislations.
- 5.3.3 Paragraph 1.11 highlights that the principles of sustainable development have been at the heart of planning policy since PPW was first published in 2002. However, the concept has been expanded under the Well-being Act and it requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural’.
- 5.3.4 Paragraph 1.14 states:

*‘In order to demonstrate that appropriate consideration has been given to the Well-being goals and sustainable development principle in the decision-making process, public bodies are required to have regard to the ‘five ways of working’ contained in the Well-being Act. These require consideration of: involvement; collaboration; integration; prevention; and long-term factors’.*

5.3.5 Paragraph 2.12 sets out the 5 key principles that should underpin the guiding vision for all development plans. The following principles support the culture change needed to embrace placemaking and ensure that planning facilitates the right development in the right place:

- Growing our economy in a sustainable manner
- Making best use of resources
- Facilitating accessible and healthy environments
- Creating & sustaining communities
- Maximising environmental protection and limiting environmental impact.

### **Retail**

5.3.6 National policies that will be considered are set out in Planning Policy Wales (PPW) (Edition 10, December 2018) along with the relevant Technical Advice Notes (TAN 4 'Retail and Commercial Development' November 2016).

5.3.7 For major new retail proposals, local planning authorities should consider not only the incremental effects of that proposal, but also the likely cumulative effects of recently completed development, together with outstanding planning permissions and development plan commitments, in the catchment areas of defined retail and commercial centres.

5.3.8 The PPW states that the three tests of retail need, sequentially preferable sites and retail impact may apply to new retail developments.

5.3.9 TAN 4 'Retail and Commercial Development (November 2016) should be read in conjunction with PPW. Paragraph 6 notes that the test of retail need is the starting point for planning for new retail development and requires any application relating to an out-of-centre location which is not in accordance with an adopted development plan, to consider need.

5.3.10 Within TAN 4 'Retail and Commercial Development' the sequential location of development plan allocations or planning application should be considered in the following order:

- Firstly, within retail and commercial centres.
- If no suitable sites are available in retail and commercial centres then edge-of centre locations should be considered, with preference given to brownfield sites that are well connected to the existing centre and accessible by a variety of means of transport.
- 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 outside, a settlement are to be considered. Preference to brownfield out-of-centre sites should be given, which are or will be served by a choice of means of transport and are close to established retail and commercial centre.

5.3.11 With regard to suitability, where a developer favours a development on the edge or outside a retail centre, evidence will need to be provided to explain why potential sites or building within the centre are unable to accommodate the format, scale and design of a proposed development. Retailers should be flexible and innovative about the format, design and scale of the proposed development and the amount of car parking needed.

- 5.3.12 The TAN guidance for retail development requires retail development over 2,500 sqm gross floorspace to be supported by an impact assessment. However smaller retail planning applications may also be assessed where local planning authorities believe it will have a significant impact on a retail and commercial centre.
- 5.3.13 TAN 4 advises that in addition to the need and sequential tests, planning applications for retail development outside a retail centre that are not in accordance within the development plan should be assessed against a range of impact criteria, including:
- Impact of the proposal on existing, committed and planned public and private investment in a centre or centre in the catchment area.
  - Impact of the proposal on centre vitality and viability, including local consumer choice and range and quality of the comparison and convenience retail offer.
  - Consideration of the cumulative effects of the development proposal in relation to any outstanding planning permissions.
  - The impact of the proposal on allocated sites outside centres being developed in accordance with the development plan.
  - Impact of the proposal on in centre trade and turnover in the centre and other centres in the wider area, taking account of current and future consumer expenditure capacity in the catchment area.
  - Assessment of the proportion of customers using the development travelling by different modes of transport.
  - Impact on travel patterns over the catchment area.
  - Any significant environmental impacts.

### **Employment**

- 5.3.14 Planning Policy Wales, paragraph 5.4.4 notes that local planning authorities should encourage and support developments which generate economic property and regeneration. Technical Advice Note 23 'Economic Development' notes that local planning authorities should apply judgement depending on the nature of the economic use and its applicability to a particular location. They should give first preference to sites within the boundaries of settlements (including planned new settlements and urban extensions). As a second preference, they should consider edge-of-settlement sites. As a third preference, they should consider identifying land in the open countryside.

## **5.4 Other Material Considerations**

### Powys LDP – Planning Obligations Supplementary Planning Guidance (2018)

- 5.4.1 This guidance supplements the policy relating to planning obligations contained in the Powys Local Development Plan (LDP) (2011-2026), which was adopted by Powys County Council on the 17th of April 2018. It has been prepared to assist decision-making on planning applications within the Powys LDP area.

5.4.2 The Development Thresholds for Planning Obligations are set out in the below table and do not comprise of Obligations relating to retail development.

Table 2: Development Thresholds for Planning Obligations

| Type of Contribution | Applies to (types of development)  | Threshold                                     |
|----------------------|--|---|
| Affordable housing   | Residential  | The threshold is set at 5 dwellings or 0.25ha |
| Public Open Space    | Residential  | The threshold is set at 10 dwellings          |
| Welsh Language       | Residential development in the Community Council Areas identified as Welsh Speaking Strongholds (where more than 25% of the population speak Welsh). | The threshold is set at 10 dwellings          |

5.4.3 Based on the above table, we can conclude that Planning Obligations will not be sought for retail development.

## 6. Retail Planning Considerations

---

### 6.1 Retail Proposal

- 6.1.1 As part of the pre-application discussions with Powys CC, an assessment of impact was requested in addition to the assessment of need and the sequential test.
- 6.1.2 However, there is no specific policy within the Powys Local Development Plan which sets a floorspace threshold for the impact test. Therefore, the 2,500 sq.m. threshold set out at paragraph 8.2 of TAN 4 applies. As the proposed development is significantly below the threshold, JLL consider's it appropriate to assess impact on a high-level, broad-brush basis which is proportionate to the development proposed.
- 6.1.3 Furthermore, given the small scale and ancillary nature of the comparison sales within the proposed development, along with the development falling well below the impact threshold, JLL consider it appropriate to consider only the convenience retail sales within the need and impact tests.
- 6.1.4 The application site extends 0.75 ha and the proposed store size is detailed below:
- GEA: 1,880 sq.m.
  - GIA: 1,804 sq.m.
  - Net Sales Area: 1,332 sq.m.
- 6.1.5 The proposed Aldi foodstore will provide a local supermarket selling predominantly convenience foods at 80% of the sales area (1,052 sq.m.) and limited comparison goods such as seasonal and promotional goods, occupying 20% of the sales floorspace (266 sq.m.). The store will be served by 104 car parking spaces.
- 6.1.6 The site is located approximately 1km from Newtown's retail core and is therefore classed as out of centre for the purposes of planning policy.

#### Need

##### Scope of the Assessment

- 6.1.7 As set out above, given the small scale, seasonal and ancillary nature of the comparison sales within the proposed development, JLL considers it appropriate to consider only the convenience retail sales within the need test.
- 6.1.8 On the basis that the application will be determined within the statutory timeframe, it is expected that the development will be constructed and open in 2021. The first full year of trading would therefore be 2021. It is therefore proposed to assess the need for the development in 2021 along with a further test year of 2023, which would represent more mature trading patterns.
- 6.1.9 The quantitative assessment of need is set out in the tables attached at Appendix 1.

##### Study Area

- 6.1.10 JLL proposes to use Zone 2 of the Powys Retail Study Update 2015 as the study area for the assessment of need and impact. A plan showing the study area is attached at Appendix 2. The study area comprises the following postcode sectors:

SY9 5

SY15 6

SY16 1

SY16 2

SY16 3

SY16 4

SY17 5

SY18 6

### Population and Spending

- 6.1.11 JLL use estimates of local population and personal spending provided by CACI. CACI spending data is presented in 2018 prices.
- 6.1.12 Estimates of growth in personal spending are calculated using growth rates provided by CACI. To estimate growth in local population over the study period, local data from Powys Local Housing Market Assessment 2014 which was used to establish housing need and identify housing targets in the Powys Local Development Plan 2011-26 has been utilised.
- 6.1.13 A deduction for special forms of trading (SFT) is made in-line with the results of the household survey in the base year. The growth of SFTs in the test years is estimated in-line with national estimates set out in Experian Retail Planner Briefing Note 16.
- 6.1.14 On this basis, Table 1 shows that the population of the Study Area is currently 32,310, which is expected to grow to 32,491 by 2023. Over the same period, local spending on convenience goods is anticipated to grow from £71.1 m to £76.7 m overall.

### Household Shopping Patterns and Turnover of Existing Retail Floorspace

- 6.1.15 JLL has commissioned a new telephone survey of convenience goods household shopping patterns in 2019 to form the basis for the assessment of need and impact. The survey has been commissioned from NEMS and has a sample size of 500 interviews. The sample size of 500 is based on advice of from NEMS as a professional survey company which considers this an appropriate size.
- 6.1.16 The shopping patterns for the Study Area are separated into the main, weekly food shopping patterns and top-up shopping patterns. These patterns are set out in Table 2 and show that the majority of residents within the Study Area carry out their convenience goods shopping at stores and centres within the Study Area. This trend is most pronounced for top-up shopping, where around 93% of people shop locally. This is to be expected given nature of such shopping trips.
- 6.1.17 80.5% of shoppers carry out their main food shopping within the Study Area. Of the 19.5% of shoppers who travel outside the Study Area for their main food shopping trip, Table 2 shows that the most popular destinations outside the Study Area are:
- Tesco in Welshpool (3.69% market share);
  - Aldi in Welshpool (3.68% market share);

- Morrisons in Welshpool (2.11% market share); and
- Aldi in Llandrindod Wells (1.70% market share).

6.1.18 When asked why shoppers chose where to carry out their main food shop, the top responses were:

Table 3: Shoppers reason for choosing destination

| Reason for Choice                      | Proportion of Responses |
|--|-------------------------|
| Lower prices                           | 16.60%                  |
| Near to home                           | 15.40%                  |
| Choice of food goods available         | 14.80%                  |
| Quality of food goods available        | 8.00%                   |
| (Don't know / no reason in particular) | 5.60%                   |
| Habit / always use it / familiarity    | 5.20%                   |
| Preference for the retailer            | 5.20%                   |
| Value for money                        | 5.00%                   |

6.1.19 Given that almost one third of all main food leakage is directed to the Aldi stores in Welshpool and Llandrindod Wells and that a new Aldi store in Newtown would meet the requirements of many of the top reasons for choosing a destination indicate that the proposed development would be well placed to recover lost trade and increase local market share.

6.1.20 Table 3 uses the market shares set out in Table 2 to calculate the turnover of retail destinations in the Study Area. The calculation assumes that around two thirds of spending is directed to main food shopping trips and the remaining one third to top-up destinations.

6.1.21 In addition to local spending, Table 3 makes an allowance for the inflow of spending from beyond the Study Area. The allowance is made in-line with the results of the Powys Retail Study Update 2015 (Table 7b of Appendix 3). The table also calculates the turnover in each of the test years, assuming static market shares.

#### Turnover of the Proposed Development

6.1.22 Aldi’s average sales density for convenience goods is £11,322 per sq.m. The sales density is based on annual sales (presented in Mintel UK Retail Rankings, and which is also available from Aldi published accounts) and sales floorspace (provided by Aldi as the sales area identified by Mintel has been underestimated).

6.1.23 However, Aldi has found that new stores opened in north Wales typically trade around 10-15% below national average levels. It is thought that this reflects the typically lower expenditure densities and smaller catchments in this part of Wales, which reflects the smaller and more separate population centres.

6.1.24 Accordingly, Table 4 calculates the turnover of Aldi in the base year using a sales density of £10,190 per sq.m.: a 10% reduction on the national average figure. Growth in sales density over the study period will be estimated using growth rates set out in Experian Retail Planner Briefing Note 16.

6.1.25 On that basis, the convenience goods turnover of the development would be expected to be £10.8 m in 2021 (the first full year of trading) which would rise marginally to £10.9 m by 2023.

### Trading Performance of Existing Stores

6.1.26 Table 5 assesses the performance of local shops, as identified through the results of the household survey against benchmarked average sales densities to provide an indication of whether existing levels of provision are sufficient to meet the demand of the local population.

6.1.27 A degree of caution should always be used when using benchmarking. Benchmark turnovers are simply the mean average turnover of a retailer's stores nationwide. It follows that half of that retailer's stores trade at below this level, most of which will do so profitably. Furthermore, consideration must be given to local circumstances which could affect the expected turnover and potential effects on profitability. For example, stores within catchments that have lower than average expenditure levels or population densities would not be expected to trade at above average levels. Additionally, stores within areas with lower than average land values or rental levels can sustain lower turnover levels. All of these factors should be considered when assessing benchmark turnover levels.

6.1.28 In Powys, population density and personal expenditure levels are below the national average. Furthermore, land and rental values are also below the UK average. Taking these factors together, it would be likely to expect that retailers trade generally below national average levels and that they can do so profitably, given lower than average rental levels.

6.1.29 However, Table 5 shows that generally, shops and supermarkets within the Study Area trade at above average levels. Given the expectation that retailers would trade below this level, this would indicate that retailers are generally trading at a very healthy level. It could also indicate that the current level of provision is below expected levels and that latent capacity for retail floorspace exists.

### Calculating Quantitative Need

6.1.30 Table 6 calculates the expenditure capacity (quantitative need) for new convenience goods retail floorspace based upon the results of the tables discussed above. The assessment calculates the capacity for additional floorspace in the test years at the current market share by subtracting the benchmark performance from the available expenditure at market share. This calculation makes an allowance for the growth in spending power of the local population and for the expected growth in sales densities over the same period.

6.1.31 Additionally, the assessment identifies that around 15% of local spending leaks from the study area to stores and centres outside the area. If leakage continues at the same rate, this leakage will equate to over £9.07m in 2021 which would be expected to grow to £9.45m by 2023.

6.1.32 At this stage, an assessment would normally consider the likely effect of any committed developments. However, JLL is not aware of any relevant developments within the Study Area that would materially affect shopping patterns.

6.1.33 On this basis, Table 6 calculates the capacity for additional convenience goods floorspace at £16.6 m in 2021 that would rise to over £19.9m by 2023. This level of capacity is more than sufficient to support the turnover of the proposed development (£10.9m) as demonstrated in Table 4 below:

Table 4: Convenience Goods Expenditure Capacity

|  | 2021         | 2022         |
|--|--------------|--------------|
| <b>Available Expenditure</b>                   | £16.6m       | £19.9m       |
| <b>Estimated Aldi Turnover</b>                 | £10.8m       | £10.9m       |
| <b>Surplus Expenditure after Aldi Proposal</b> | <b>£5.8m</b> | <b>£9.0m</b> |

6.1.34 Some £9.0m of expenditure will remain available in 2023 leaving further capacity for additional convenience floorspace after the proposed Aldi store has come forward. Accordingly, it is concluded that a quantitative need for the proposed development has been demonstrated.

### Qualitative Need

6.1.35 The assessment of quantitative need outlined above demonstrates a clear deficiency in the provision of convenience goods retail in the Study Area. The assessment clearly demonstrates that there are insufficient destinations within the area that allow local residents to carry out their main food shopping trip close to home.

6.1.36 Accordingly, the proposed development will address a clear local deficiency in convenience goods shopping provision. The proposed development will serve the residents of the Study Area, providing a valuable and convenient main food shopping destination.

6.1.37 Furthermore, the lack of sufficient shopping facilities is perpetuating unsustainable shopping patterns where local people are being forced to travel longer distances to carry out an important shopping trip. The survey shows that for main food shopping trips, people travel to the larger supermarkets in Llandrindod Wells and Welshpool, notably the Aldi stores in these towns. In this regard, it should be noted that on average, 76% of shoppers travel by car as the driver to carry out their main food shopping trip. When including those who travel as the passenger in the car, the total rises to 84%. Accordingly, by locating a new main food shopping destination within walking distance of residential areas, the proposed development offers a real opportunity to reduce the reliance on the private car.

6.1.38 In so doing, the development will help promote more sustainable shopping patterns. Journey lengths will generally be reduced and for residents of Newtown, the store will be within walking distance.

6.1.39 Discount supermarkets increasingly compete with the ‘Big 4’ operators and offer a broad but not complete range of convenience items at a dramatically reduced cost. This national trend is borne out by the evidence of the household survey which shows that 37.4% of expenditure leaking out of the Catchment Area is spent in the discount supermarkets (i.e. the Aldi stores in Llandrindod Wells, Welshpool and Ludlow).

- 6.1.40 This clearly demonstrates that there is customer demand resulting in a qualitative requirement by residents of the catchment area to shop at a discount supermarket particularly as they are currently willing to travel significant distances to shop at such a store.
- 6.1.41 Not only would a modern discount food store provide high quality produce at heavily discounted prices, but it would also reduce travel costs for those shoppers currently travelling out of the catchment area. Therefore, local residents will both save money by shopping in the proposed discount store and by reducing travel costs. The qualitative need for the proposal is therefore highly important to support the local and hinterland communities of Newtown, Bishop's Castle, Llanidloes and Caersws.
- 6.1.42 Having regard to the above, it is considered that there is a clear and compelling qualitative need for the proposed development in Newtown which will deliver sustainable development.

### Conclusions on Need

- 6.1.43 The assessment of need set out above demonstrates that there is a clear and compelling need for new main-food convenience retail floorspace in the Study Area. The need is both quantitative (the need to reduce the high leakage of spending) and qualitative (to address a local deficiency in provision and to encourage more sustainable travel patterns).
- 6.1.44 Accordingly, the proposed development accords with PPW, TAN4 and Policy R1 of the Development Plan.

### Sequential Test

#### Scope of the Assessment

- 6.1.45 Newtown is defined as an Area Retail Centre in Policy R1 of the adopted Powys Local Development Plan, the top tier of the retail hierarchy in Powys. Based on the position of Newtown in the centre hierarchy and the lack of other Area Retail Centres in the local area, the assessment of sites limits the search for sequentially preferable sites to Newtown, as this is the most appropriate centre for development of this type and scale in the local area.
- 6.1.46 As the site is situated in an out of centre location, the sequential test will consider sites located in the following locations in Newtown:
- Town centre;
  - Edge-of-centre; and
  - Out-of-centre which are well connected to the centre.
- 6.1.47 For the purposes of the Test, the town centre is taken to be the retail core, comprising the primary and secondary shopping frontages defined in the Powys Local Development Plan 2011-26.
- 6.1.48 Discount foodstores of the size proposed typically require a site area of 0.75 ha (1.85 acres) to accommodate a single store development. This allows for accommodation of the food store, servicing and 120 car parking spaces. To deliver these elements on a site of 0.75 ha, the site must be regular in shape to provide the most efficient use of land. Irregular shape sites are likely to be less efficient, requiring more land to accommodate the proposal. Sites must be located on a main frontage, in a

prominent location and clearly visible to customers to ensure the store is recognised and draw on passing trade.

6.1.49 While there is limited scope for flexibility in layout and scale in relation to discount supermarket developments without affecting the core business model, there is some flexibility within site requirements which can be accommodated. The overall site requirement can be reduced eg by reducing the number of parking spaces. However, overall, the model of a discount foodstore seeks to deliver an efficient site that minimises land take and do away with extravagant details to deliver a low cost operation.

**Assessment of Alternative Sites**

6.1.50 The following sites have been identified for assessment as part of the sequential test.

**Town Centre**

- Ladywell Shopping Centre PLEASE ADD ROAD NAME

**Edge of Centre**

- Back Lane Car Park off Wesley St
- Phoenix Furniture PLEASE ADD ROAD NAME

**Out of Centre**

- Application Site: Greenhouse Ford Site, Pool Road.

6.1.51 Each of the potential sites are addressed below with detailed site information set out in Appendix 3.

**Town Centre**

**Ladywell Shopping Centre**

6.1.52 Ladywell Shopping Centre is located east of New Church Street and is within the Town Centre.



Available

- 6.1.53 The Shopping Centre is currently undergoing major refurbishment to become the new headquarters of Quartix, a vehicle tracking supplier. Quartix has signed a lease with property owner EvaBuild Developments with the aim of bringing together under one roof more than 120 employees based in Newtown to allow for further growth.
- 6.1.54 Ladywell Shopping Centre can therefore be considered unavailable for the purposes of this test.

Suitable

- 6.1.55 As set out above, discount foodstores of the size proposed require a site area of 0.75 ha (1.85 acres) on a regular site to accommodate the type of development proposed. The Ladywell Shopping Centre measures 0.3ha and is therefore much too small to accommodate the type of development proposed, even allowing for a reasonable degree of flexibility.
- 6.1.56 The site at Ladywell Shopping Centre is therefore not considered to be suitable for the type of development proposed.

Conclusion

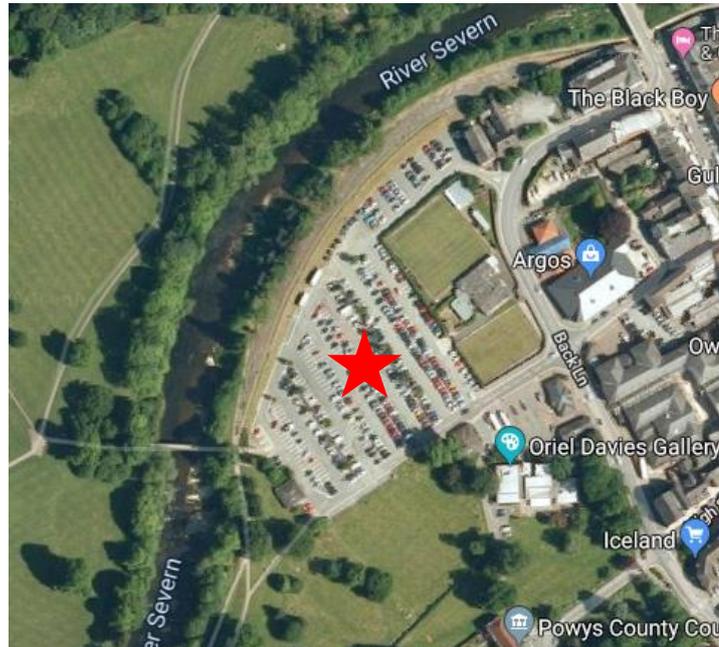
- 6.1.57 The site measures 0.3ha which is less than half the size of site required to accommodate development of the type proposed by this application. It is therefore considered that the site is not be suitable for the type of development proposed by this application, even allowing for a reasonable degree of flexibility.
- 6.1.58 The site is currently being redeveloped and will be occupied by Quartix. The site is therefore not available.
- 6.1.59 Having regard to the above, it is considered that the Ladywell Shopping Centre site is neither available nor suitable for the type of development proposed and can therefore be dismissed as part of the sequential test.

**Edge of Centre**

*Back Lane Car Park*

- 6.1.60 The site comprises the Back Lane car park, a 0.98 ha. Council owned and operated pay and display car park to the north west of Newtown Town Centre. The site is Newtown town centre's primary customer car park, it is well used and located adjacent to the bus station.
- 6.1.61 The car park is hard-surfaced and level and is accessed via Back Lane.

6.1.62 The River Severn abuts the site to the north and west and currently development is underway to the east with hoarding present around the site adjacent to the east.



Available

6.1.63 The site is currently occupied by Back Lane car park, which is owned and operated by Powys County Council.

6.1.64 The site is in active use and is not being marketed. The site can therefore be considered unavailable for the purposes of this test.

Suitable

6.1.65 The site is located edge of centre and is therefore located within a highly accessible location. The site also measures 0.98ha and is therefore large enough to accommodate the type of development proposed. However, redevelopment of this site would deprive the town centre of its main car parking facility, which would undoubtedly have a significant impact upon the centre.

6.1.66 Furthermore, the site sits to the rear of the town centre. It is not on a main road and sits behind the operational bowling green, existing buildings and a walled perimeter at Back Lane. As a major convenience retailer, it requires a prominent, visible location with significant passing trade. However, passing traffic is limited to those accessing Wesley Street to the west, users of the local park and bus station. As a back of centre location, reflective of the name Back Lane, this is not achievable and would not meet business requirements of a discount foodstore operator.

6.1.67 As such, the site is not considered suitable for the purposes of this test and the consequential impact of redevelopment upon Newtown town centre must be borne in mind too.

Conclusion

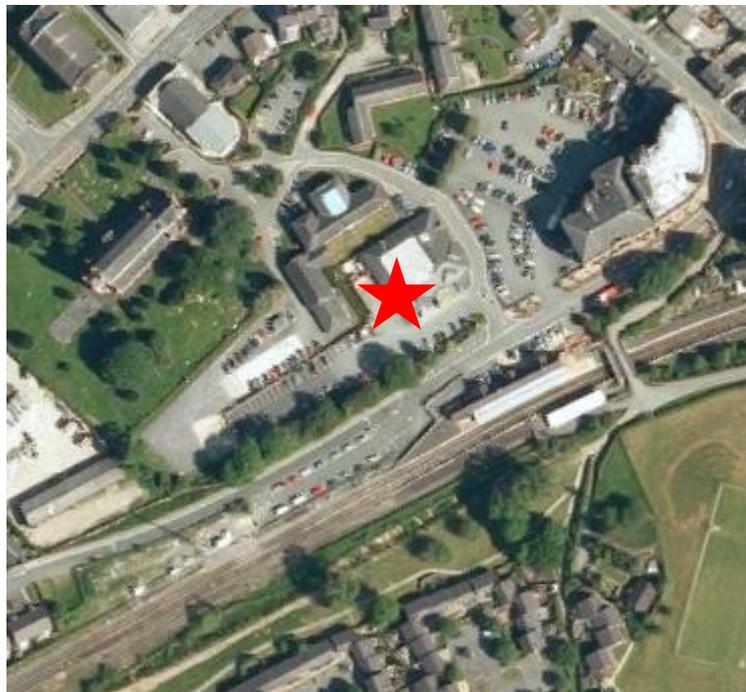
6.1.68 While the site is of an appropriate size to accommodate the type of development proposed by this application, the site is not being marketed and is therefore considered to be not available. Furthermore, the site is located in a back of centre location, with no main road frontage, poor visibility and

prominence for customers and would result in the loss of the the principal town centre car park for Newtown town centre..

- 6.1.69 Having regard to the above, it is considered that the Back Lane car park site is not available or suitable for the purposes of the test and can be dismissed as part of the sequential test.

Phoenix Furniture

- 6.1.70 The 0.34 ha. site comprises of a former retail unit (currently occupied by Pheonix Furniture (517sq.m. Sales Area), and a 62 space car park.
- 6.1.71 The former store is located within the wider Town Centre, but for the purpose of a Retail Sequential Test, the site is considered to be Edge of Centre as it falls outside the primary and secondary shopping frontages.



Available

- 6.1.72 The site is currently occupied by Phoenix Furniture which is utilising the former Somerfield's building. As set out within the proforma in Appendix 3 the building was subject to a Change of Use from A1 (retail) to B8 (Storage and Distribution) which was approved in 2015.
- 6.1.73 The site building is not currently being marketed and therefore the site can therefore be considered unavailable for the purposes of this test.

Suitable

- 6.1.74 The site is approximately 0.34ha (including the associated car park), which is less than half the size of site required to accommodate development of the type proposed by this application. It is therefore considered that the site is not be suitable for the type of development proposed by this application, even allowing for a reasonable degree of flexibility.

### Conclusion

- 6.1.75 The site is not being marketed and is therefore not available. Furthermore, the site is too small to accommodate the type of development proposed, even allowing for a reasonable degree of flexibility.
- 6.1.76 Having regard to the above, it is concluded that the Phoenix Furniture site is neither available or suitable and can therefore be dismissed as part of the sequential test.

### Overall Conclusion on the Sequential Test

- 6.1.77 Having regard to the above, it is concluded that none of the sites assessed are both available and suitable for the type of development proposed by this application, even allowing for a reasonable degree of flexibility. All sites are discounted from the sequential test, as such, it is concluded that the proposed the Greenhous Ford site, Pool Road, passes the sequential test.

### Calculating Impact

- 6.1.78 The assessment of retail impact is based upon the assessment of quantitative need attached at Appendix 1. The assessment of trade diversion and impact in 2021 and 2023 on existing stores is set out in Tables 7 and 8.
- 6.1.79 Typically, Aldi stores divert trade from like for like stores which are existing Aldi stores and Lidl stores within and outside of the defined catchment area. However, Aldi is increasingly competing directly with the big four supermarket operators. Given the limited range of main-food convenience shopping destinations in the surrounding area, it is a reasonable assumption that trade will be diverted from existing supermarkets in the wider area and beyond the Study Area and to a lesser extent, the smaller convenience stores in Newtown and the wider Study Area.
- 6.1.80 Furthermore, shoppers are changing their convenience shopping patterns. They are increasingly visiting Aldi as part of a shared trip. Given the range of products on offer at an Aldi store, shoppers buy quality products at low prices that are available at the store and continue their shopping at a larger format store for other products including branded products (or vice versa). Given the limited range of products in an Aldi store (they sell circa 1,800 lines compared with over 20,000 – 40,000 lines in the larger format stores) shoppers are encouraged to continue to use local, independent and specialist retailers therefore linked trips are common to and from Aldi stores.
- 6.1.81 In addition, Aldi's range of branded goods is limited to 5% of all goods. Therefore, shoppers still visit competing stores to buy branded products which Aldi do not sell. Indeed, an Aldi store is not a one stop shop, rather it provides a complementary shopping offer with local independent and specialist retailers; and with the larger format stores. Of particular note, Aldi does not provide a bakery, fresh meat, deli or fish counters. Nor does it provide tobacco or pharmacy counters. There are no concessions or cafes within an Aldi store. All these offers are absent and reduce the dwell time within an Aldi store, which encourages customers to use their Local and District centre stores to provide such goods and services.

- 6.1.82 On this basis, the assessment of trade diversion set out in Table 7 is based upon the existing shopping patterns identified by the household survey, weighted heavily in favour of the main food patterns and the larger supermarkets, with which Aldi will primarily compete. The assessment assumes that the proposed store, like other stores in Newtown will attract a degree of trade from beyond the study area. This is assumed to be in-line with current levels of inflow at 16% as reflected in the Council's county wide retail study.
- 6.1.83 The assessment shows that the most trade will be diverted from other supermarkets, namely:
- Lidl, Newtown (£1.71m)
  - Morrisons, Newtown (£2.8m)
  - Tesco, Newtown (£1.8m)
- 6.1.84 All of these stores are located in edge or out of centre locations. As such, they do not benefit from direct town centre policy protection. The assessment also estimates that around £0.4m will be diverted from Newtown Town Centre. This is unsurprising given that Table 3 shows the centre derives the bulk of its turnover from top-up shopping trips (£3.6m compared to £1.8m from main food shopping).
- 6.1.85 The assessment shows in Table 8 that the impact of the proposed development on local shops in Newtown would be around 6%. The degree of impact upon the out of centre supermarkets would be noticeably higher (between 11% and 13%), which is to be expected given the direct competition between such stores. However, it should be noted that of these stores, both Lidl and Morrisons trade significantly above average levels and would continue to do so following the proposed development.

#### Interpreting Impact

- 6.1.86 As set out above, while the numeric impact on the existing supermarkets in Newtown may appear high at first glance, the stores trade well with both Lidl and Morrisons trading significantly above average levels and would continue to do so following the proposed development. As such, it is considered that the proposed development will not have a significantly adverse impact on any of these supermarkets.
- 6.1.87 Importantly, whilst the Lidl store is the closest supermarket to the town centre, it is considered out of centre, located some 260m away from the Park St town centre boundary at its nearest point and severed from the centre by Llanidloes Road, thus any impact on the store is unlikely to have any material impact on the health of a town centre. Moreover, most customers, travel by car to the Lidl store as with most supermarkets, then customers return to their cars and travel to their next shopping destination.
- 6.1.88 As set out above, an Aldi store is not a one stop shop, rather, it provides a complementary shopping offer with local independent and specialist retailers; and with the larger format stores. Of particular note, Aldi does not provide fresh meat, deli or fish counters. Nor does it provide tobacco or pharmacy counters. There are no concessions or cafes within an Aldi store. All these offers are absent and reduce the dwell time within an Aldi store, which encourages customers to use their town centre stores to provide such goods and services. As such, a trip to an Aldi store is likely to be accompanied by an onward, linked trip to other shops and services.
- 6.1.89 This benefit was accepted recently by an Inspector when considering a similar out-of-centre Aldi store in Whitchurch, Shropshire. At paragraph 11 of the decision letter, the Inspector concluded:

*“In terms of linked trips, in my view, those choosing to shop at the proposed ALDI store would still be likely to make onward trips into the town centre to purchase other types of goods to those offered by ALDI. They would also use the various other facilities such as banks, public houses and cafés. Indeed, there are many town centre businesses that have completely different offers to a store such as ALDI and I see no reason why it would divert shoppers away from using those other businesses.”*

- 6.1.90 Indeed, this facilitation of linked trips is a noticeable benefit when compared to larger supermarkets which often aim to provide a one-stop-shop approach which minimises the need for any further linked trip.
- 6.1.91 Turning to the impact upon Newtown town centre, the identified level of impact is low and given that the centre is generally trading well, at above expected levels it is not anticipated that the impact of the proposed store will have a significantly adverse effect. Furthermore, the health check of Newtown notes that the centre is healthy, well used and vital. The centre also benefits from tourists who visit for a range of different activities and use a wider range of services including banks, cafes and restaurants. Moreover, the bulk of supermarket retailers are located in out of centre locations, and as demonstrated within JLL’s trade diversion assessment, the majority of impact will be on those similar retailers which are not present in the town centre. Taking these factors into account, alongside the quantitative assessment, it is concluded that the proposed development will not have a significantly adverse impact on the vitality and viability of Newtown town centre.
- 6.1.92 With regard to impact on investment, JLL is not aware of any existing, committed or planned investment in Newtown town centre or any other centre within the Study Area that could potentially be affected by the proposed development.

#### Conclusions on Impact

- 6.1.93 Having regard to all of the above, it is concluded that the retail impact assessment shows that the proposed development would not have a ‘detrimental consequence’ on designated centres, which in the case of this assessment is Newtown. Therefore, the proposal accords with PPW, TAN 4, Policy R1 of the Development Plan.

## 7. Planning Considerations

---

### 7.1 Introduction

7.1.1 This section assesses the proposed development against the requirements of national planning policy set out in PPW 10 and accompanying Technical Advice Notes, the current Development Plan and the emerging Local Plan Development Plan 2, as set out in Section 5. This section draws upon the conclusions of the suite of technical assessments submitted in support of the planning application.

### 7.2 Sustainable Development

- 7.2.1 The PPW sets out that developments should seek to maximise energy efficiency and the efficient use of other resources, highlighting that good design promotes environmental sustainability. Moreover, adopted LDP Objective 2 sets out how Powys County council aim to support sustainable development, access to services and the integration of land uses, by directing housing, employment and services development in accordance with a sustainable settlement hierarchy
- 7.2.2 It is considered that the criteria within the PPW and local policy provide a reasonable framework for considering what constitutes sustainable development and therefore has significant weight in the decision-making process.
- 7.2.3 The proposed food store scheme compliments and integrates with surrounding land uses, which is a mix of retail and commercial area. As such, the development will not negatively impact on the surrounding setting and will reinforce the local economy.
- 7.2.4 The site is brownfield and promotes efficient use of land.
- 7.2.5 With regards to public transport, the closest bus stop to the site is located 430m south west of the site, along Pool Road. Services 71, T12 and X75 operate along this route offering regular services to Newtown Town Centre, Llangurig, Llanidloes, Machynlleth and Rhayader. As identified within the Transport Assessment produced by Cameron Rose Associates, the proposed development promotes accessibility by all modes of travel, in particular public transport, cycling and walking by virtue of its sustainable location and the physical infrastructure that would be put in place.

### 7.3 Principle of Retail Use

- 7.3.1 As the proposed development is for a town centre use in an out of centre location, a Sequential Assessment is required to give the Council comfort that the proposal is the most sequentially preferable site. The Sequential Assessment identified no sites within the defined study area that are both available and suitable for development of a similar nature to the proposed store and allowing flexibility.
- 7.3.2 Furthermore, a quantitative assessment of need and impact have been carried out in respect of the proposed development. The assessment is based on up-to-date evidence of local shopping patterns and spending. The assessment demonstrates that there is a quantitative and qualitative need for the proposed development and that the proposed store would not have a detrimental consequence upon Newtown town centre.

7.3.3 The proposal passes the need test, sequential test and impact tests and thus complies with national retail policy and Policy R1 in Powys County Council's Local Development Plan.

#### **7.4 Design**

7.4.1 The proposal has been designed in such a way to ensure sufficient car parking provision and servicing access as well as visibility of the store from the surrounding road network. This is a fundamental requirement for any retailer. The layout ensures a prominent and active frontage onto the customer car park and the surrounding road network, which complements the existing neighbouring uses.

7.4.2 The layout also ensures it integrates well with the neighbouring uses.

7.4.3 In terms of design and materials, the proposed store uses a simple palette of materials, drawing on locally used materials to complement the local area by way of introducing a modern addition to the local vernacular and immediate context.

7.4.4 Having regard to the above, it is considered that the development complies with Policy DM13 of Powys County Council's Local Development Plan.

#### **7.5 Drainage**

7.5.1 A Drainage Strategy Statement has been prepared by SWF to support the planning application. The Statement explains that the existing site is within Flood Zone A and therefore has little to no risk of fluvial or tidal/coastal flooding.

7.5.2 The proposed Drainage Scheme comprises the car park area which is expected to be drained via a porous macadam over 4-20mm stone which will act as a storage medium for the attenuation volumes. Given the need to prevent the infiltration of water to the ground, due to potential contamination, a series of perforated pipes will convey the flows to the outfall position.

7.5.3 The service yard area will need to be hard landscaped and, as such, will contain a conventional piped drainage system. A proprietary oil separator with high level alarm will be provided with silt traps being provided upstream to limit the risk of sedimentation of the system.

7.5.4 Given the need to limit discharge from the site it is expected that some geo-cellular storage will be provided under the service yard with the use of a vortex flow control limiting the discharge.

7.5.5 The roof will also require use of a pipe drainage system which is likely to be connected to the service yard drainage. The pollution hazard level of the type of roof proposed is very low with suspended solids giving the greatest risk. Silt trap manholes will be provided to this drainage system to slow the flow of water through the piped system to allow the solids to settle rather than enter the offsite drainage network.

7.5.6 Under Welsh Government requirements, the development will be subject to a separate SAB application to Powys Council to agree the proposed drainage scheme.

7.5.7 Based on the above, it is considered that the proposed development is in accordance with SAB standards and in line with Policy DM6 of Powys County Council's Local Development Plan.

## 7.6 Highways

- 7.6.1 The application submission is supported by a Transport Assessment carried out by Cameron Rose Associates which examines the highway and transportation issues associated with the proposed development.
- 7.6.2 The site is within a sustainable location as it is located in close proximity to the bus stops which provide services that are ideally places to cater for the need of the proposed foodstore and is accessible by other sustainable modes of transport, including walking and cycling.
- 7.6.3 Customer access to the development site is proposed via a newly formed priority controlled junction off Wern Ddu Lane, approximately 30 metres south of the A483(T) Pool Road. The new bell mouth will be constructed with six metre radii and tactile paving. A separate service vehicle access will be provided from the access road on the north eastern boundary of the site.
- 7.6.4 This report has demonstrated how the proposed development promotes accessibility by all modes of travel. Furthermore, it has also been demonstrated how the development would reduce the need to travel, especially by car with regard to the element of pass-by, diverted and transferred trips. Within the Report the impacts of residual trips from the proposed development have been assessed and it is evident that these would not have a material impact on the operational performance and safety of the local highway network.
- 7.6.5 Based on the findings of the Transport Assessment, it is concluded that there are no overriding reasons preventing the Local Planning Authority from recognising that the proposal is acceptable with regard to the local highway network. Based on the above, it is considered that the proposed development is in accordance with Policy T1 of Powys County Council's Local Development Plan.

## 7.7 Noise

- 7.7.1 A Noise Assessment has been undertaken by Spectrum Acoustic Consultants to assess the potential impact of noise produced by mechanical services plant and deliveries associated with the proposed Aldi food store at land off Pool Road in Newtown, Powys.
- 7.7.2 In relation to deliveries, the assessment concluded that that noise levels from unrestricted deliveries at the proposed Aldi store would comfortably meet noise limit objectives and consequently have a very low impact.
- 7.7.3 In relation to mechanical services plant, the assessment concluded that the overall noise levels from these services would comfortably meet noise limit objectives and consequently have a very low impact.
- 7.7.4 The Noise Assessment has therefore concluded that the development would have a very low impact, in line with Policy DM13 of Powys County Council's Local Development Plan.

## 7.8 Ecology

- 7.8.1 A Preliminary Ecology Assessment (PEA) has been undertaken by Cambrian Ecology Ltd. The purpose of the assessment was to gain baseline ecological information of the site in order to assess its current

status, to identify any ecological constraints to development that may currently be associated with the development areas and/or the surrounding land, and to recommend further surveys if necessary.

- 7.8.2 The Assessment concluded that there was no sign of bats or bat occupation recorded during the survey and all buildings were concluded to have either no or very low potential to support roosting bats at any time of year. There are few external crevices and no interior roof voids. The site itself is located within a well-illuminated, urban area with additional security lighting.
- 7.8.3 There are no natural or semi-natural habitats on the site.
- 7.8.4 A biological records search was carried out to assess any potential impact on protected species outside the proposed development boundary and establish the 'zone of influence' of the development. The search revealed no records for the site itself and no relevant records within the search area.
- 7.8.5 It was concluded that there is negligible potential within any of the buildings on the site for roosting bats at any time of the year and overall, there will be no negative impact on any protected species or habitats due to the proposed development.
- 7.8.6 Based on the above, it is considered that the proposed development will be in accordance with section 3 within National Planning Wales and with Policy DM2 of Powys County Council's Local Development Plan.

## **7.9 Conclusion**

- 7.9.1 Having regard to the above assessment of the relevant planning policies, it is concluded that the proposed Aldi store will deliver sustainable development and thus benefits from the in-principle support within the Development Plan and national policy. Furthermore, the application proposal is considered to be in accordance with the relevant policies of the Development Plan taking on board all technical assessments provided. On that basis, taking account of the material considerations and evidence provided in support of the planning application, it is concluded that the proposal complies with objectives of the Development Plan.

## 8. Conclusions

---

- 8.1.1 The Planning Statement with Retail Assessment is submitted in support of an application for the ‘Demolition of existing buildings and erection of a foodstore (Use Class A1), car park, access and landscaping at Land South of Pool Road, Newtown’.
- 8.1.2 The application site is out of centre and as such Planning Policy Wales requires that all retail proposals should provide an assessment need and sequentially preferable sites and that a proposal should only be supported if need is identified and no sequentially preferable sites are identified.
- 8.1.3 The assessment of retail need demonstrates that there is a quantitative and qualitative need for the proposed development.
- 8.1.4 An assessment of sequentially preferable sites has been undertaken. Of the sites assessed, none were found to be available and suitable for the proposal and were discounted from the test. Therefore, the application sites passes the sequential test.
- 8.1.5 Additionally, a proportionate impact assessment was undertaken and demonstrates that the development will not undermine the vitality and viability of Newtown Town Centre. Accordingly, the development accords with Policy R1 of the Local Development Plan and PPW.
- 8.1.6 The three retail tests are passed.
- 8.1.7 The proposal will provide a sensitively designed development which is compatible and complementary to the surrounding uses. A significant number of jobs will be introduced as a result of the proposal, in the region of 40 jobs comprising full time and part time positions, with most being taken up by local people.
- 8.1.8 The site will be redeveloped on a brownfield site delivering an efficient use of land.
- 8.1.9 Overall, it is concluded that the proposed development comprises sustainable development which meets all relevant policy tests set out in the Development Plan, PPW and its accompanying Technical Advice Notes. Accordingly, it is concluded that the proposed development is in accordance with the Local Development Plan and should be granted consent.

## Appendix 1 – Retail Need and Impact Assessment

---

Retail Need and Impact Assessment  
Proposed New Aldi Store at Newtown

Table 1: Population and Convenience Goods Spending in the Study Area

| Year | Population | Personal Spending | Total Spending | Total Spending (exc SFT) |
|------|------------|-------------------|----------------|--------------------------|
| 2019 | 32,310     | £2,304            | £73.74         | £71.12                   |
| 2020 | 32,372     | £2,337            | £74.95         | £72.09                   |
| 2021 | 32,435     | £2,384            | £76.60         | £73.60                   |
| 2022 | 32,463     | £2,436            | £78.34         | £75.14                   |
| 2023 | 32,491     | £2,488            | £80.07         | £76.65                   |

Population estimates taken from CACI data

Growth in population estimated using data from Powys Local Housing Market Assessment 2014

Estimates of personal spending provided by CACI

Estimates of growth of personal spending calculated using CACI growth rates

Deduction for SFT made inline with Household Survey

Growth of SFT estimated in line with national growth rates set out in Experian Retail Planner Briefing Note 16

Retail Need and Impact Assessment  
Proposed New Aldi Store at Newtown

Table 2: Market Shares in 2019

| Destination   | Market Share   |                |                |
|---|----------------|----------------|----------------|
|   | Main           | Top-up         | Total          |
| <b>Inside Study Area</b>                                    |                |                |                |
| Lidl, Llanidloes Road, Newtown                              | 18.36%         | 8.32%          | 14.95%         |
| Morrisons, Pool Road, Newtown                               | 30.34%         | 9.55%          | 23.27%         |
| Tesco, Pool Road, Newtown                                   | 19.24%         | 16.11%         | 18.18%         |
| Newtown Town Centre   | 3.72%          | 14.56%         | 7.40%          |
| Other Stores Newtown  | 0.04%          | 5.22%          | 1.80%          |
| Local Shops, Bishops Castle                                 | 3.14%          | 9.71%          | 5.38%          |
| Local Shops, Caersws  | 0.22%          | 7.67%          | 2.75%          |
| Local Shops, Llanidloes                                     | 4.57%          | 14.64%         | 7.99%          |
| Local Shops, Montgomery                                     | 0.03%          | 4.09%          | 1.41%          |
| Local Shops Churchstoke                                     | 0.80%          | 2.87%          | 1.51%          |
| <b>Total Study Area</b>                                     | <b>80.46%</b>  | <b>92.73%</b>  | <b>84.64%</b>  |
| <b>Outside Study Area</b>                                   |                |                |                |
| Aldi, Station Crescent, Llandrindod Wells                   | 1.70%          | 0.00%          | 1.12%          |
| Tesco, Waterloo Road, Llandrindod Wells                     | 0.33%          | 0.04%          | 0.23%          |
| Aldi, Mill Lane, Welshpool                                  | 3.68%          | 2.21%          | 3.18%          |
| Morrisons, Berriew Street, Welshpool                        | 2.11%          | 0.00%          | 1.39%          |
| Sainsbury's, Brook Street, Welshpool                        | 0.24%          | 0.40%          | 0.29%          |
| Tesco, Smithfield Road, Welshpool                           | 3.69%          | 1.68%          | 3.01%          |
| Aldi, Station Drive, Ludlow                                 | 0.09%          | 0.00%          | 0.06%          |
| Asda, Malinsgate, Telford                                   | 0.04%          | 0.00%          | 0.03%          |
| Asda, Old Potts Way, Shrewsbury                             | 0.65%          | 0.00%          | 0.43%          |
| Sainsbury's Superstore, Meole Brace Retail Park, Shrewsbury | 0.64%          | 0.00%          | 0.42%          |
| Tesco Extra, Cattle Market, Battlefield Road, Shrewsbury    | 0.57%          | 0.00%          | 0.38%          |
| Tesco Superstore, Station Drive, Ludlow                     | 0.04%          | 0.00%          | 0.03%          |
| Other Outside Study Area                                    | 0.84%          | 2.01%          | 1.24%          |
| <b>Total Outside Study Area</b>                             | <b>14.62%</b>  | <b>6.34%</b>   | <b>11.81%</b>  |
| Internet / Delivery   | 4.91%          | 0.92%          | 3.56%          |
| <b>Total</b>  | <b>100.00%</b> | <b>100.00%</b> | <b>100.00%</b> |

Market Shares derived from household shopping survey

Table 3: Turnover of Stores in the Study Area

| Destination   | 2019         |              |              |              | 2021         |              |              |              | 2023         |              |              |              |
|---|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
|   | Main         | Top-Up       | Inflow       | Total        | Main         | Top-Up       | Inflow       | Total        | Main         | Top-Up       | Inflow       | Total        |
| <b>Inside Study Area</b>                                    |              |              |              |              |              |              |              |              |              |              |              |              |
| Lidl, Llanidloes Road, Newtown                              | £8.9         | £2.1         | £2.1         | <b>£13.1</b> | £9.4         | £2.1         | £2.2         | <b>£13.7</b> | £9.8         | £2.2         | £2.3         | <b>£14.3</b> |
| Morrisons, Pool Road, Newtown                               | £14.8        | £2.4         | £3.3         | <b>£20.5</b> | £15.5        | £2.4         | £3.4         | <b>£21.4</b> | £16.1        | £2.5         | £3.6         | <b>£22.2</b> |
| Tesco, Pool Road, Newtown                                   | £9.4         | £4.0         | £2.6         | <b>£16.0</b> | £9.8         | £4.1         | £2.7         | <b>£16.6</b> | £10.2        | £4.2         | £2.8         | <b>£17.3</b> |
| Newtown Town Centre   | £1.8         | £3.6         | £1.1         | <b>£6.5</b>  | £1.9         | £3.7         | £1.1         | <b>£6.6</b>  | £2.0         | £3.8         | £1.1         | <b>£6.9</b>  |
| Other Stores Newtown  | £0.0         | £1.3         | £0.3         | <b>£1.6</b>  | £0.0         | £1.3         | £0.3         | <b>£1.6</b>  | £0.0         | £1.4         | £0.3         | <b>£1.7</b>  |
| Local Shops, Bishops Castle                                 | £1.5         | £2.4         | £1.0         | <b>£4.9</b>  | £1.6         | £2.5         | £1.0         | <b>£5.1</b>  | £1.7         | £2.6         | £1.0         | <b>£5.3</b>  |
| Local Shops, Caersws  | £0.1         | £1.9         | £0.5         | <b>£2.5</b>  | £0.1         | £1.9         | £0.5         | <b>£2.6</b>  | £0.1         | £2.0         | £0.5         | <b>£2.7</b>  |
| Local Shops, Llanidloes                                     | £2.2         | £3.7         | £1.6         | <b>£7.5</b>  | £2.3         | £3.7         | £1.6         | <b>£7.7</b>  | £2.4         | £3.9         | £1.7         | <b>£8.0</b>  |
| Local Shops, Montgomery                                     | £0.0         | £1.0         | £0.3         | <b>£1.3</b>  | £0.0         | £1.0         | £0.3         | <b>£1.3</b>  | £0.0         | £1.1         | £0.3         | <b>£1.4</b>  |
| Local Shops Churchstoke                                     | £0.4         | £0.7         | £0.3         | <b>£1.4</b>  | £0.4         | £0.7         | £0.3         | <b>£1.4</b>  | £0.4         | £0.8         | £0.3         | <b>£1.5</b>  |
| <b>Total Study Area</b>                                     | <b>£39.2</b> | <b>£23.3</b> | <b>£12.9</b> | <b>£75.3</b> | <b>£41.1</b> | <b>£23.4</b> | <b>£13.3</b> | <b>£77.8</b> | <b>£42.8</b> | <b>£24.4</b> | <b>£13.9</b> | <b>£81.1</b> |
| <b>Outside Study Area</b>                                   |              |              |              |              |              |              |              |              |              |              |              |              |
| Aldi, Station Crescent, Llandrindod Wells                   | £0.8         | £0.0         | -            | <b>£0.8</b>  | £0.9         | £0.0         | -            | <b>£0.9</b>  | £0.9         | £0.0         | -            | <b>£0.9</b>  |
| Tesco, Waterloo Road, Llandrindod Wells                     | £0.2         | £0.0         | -            | <b>£0.2</b>  | £0.2         | £0.0         | -            | <b>£0.2</b>  | £0.2         | £0.0         | -            | <b>£0.2</b>  |
| Aldi, Mill Lane, Welshpool                                  | £1.8         | £0.6         | -            | <b>£2.3</b>  | £1.9         | £0.6         | -            | <b>£2.4</b>  | £2.0         | £0.6         | -            | <b>£2.5</b>  |
| Morrisons, Berriew Street, Welshpool                        | £1.0         | £0.0         | -            | <b>£1.0</b>  | £1.1         | £0.0         | -            | <b>£1.1</b>  | £1.1         | £0.0         | -            | <b>£1.1</b>  |
| Sainsbury's, Brook Street, Welshpool                        | £0.1         | £0.1         | -            | <b>£0.2</b>  | £0.1         | £0.1         | -            | <b>£0.2</b>  | £0.1         | £0.1         | -            | <b>£0.2</b>  |
| Tesco, Smithfield Road, Welshpool                           | £1.8         | £0.4         | -            | <b>£2.2</b>  | £1.9         | £0.4         | -            | <b>£2.3</b>  | £2.0         | £0.4         | -            | <b>£2.4</b>  |
| Aldi, Station Drive, Ludlow                                 | £0.0         | £0.0         | -            | <b>£0.0</b>  | £0.0         | £0.0         | -            | <b>£0.0</b>  | £0.0         | £0.0         | -            | <b>£0.0</b>  |
| Asda, Malinsgate, Telford                                   | £0.0         | £0.0         | -            | <b>£0.0</b>  | £0.0         | £0.0         | -            | <b>£0.0</b>  | £0.0         | £0.0         | -            | <b>£0.0</b>  |
| Asda, Old Potts Way, Shrewsbury                             | £0.3         | £0.0         | -            | <b>£0.3</b>  | £0.3         | £0.0         | -            | <b>£0.3</b>  | £0.3         | £0.0         | -            | <b>£0.3</b>  |
| Sainsbury's Superstore, Meole Brace Retail Park, Shrewsbury | £0.3         | £0.0         | -            | <b>£0.3</b>  | £0.3         | £0.0         | -            | <b>£0.3</b>  | £0.3         | £0.0         | -            | <b>£0.3</b>  |
| Tesco Extra, Cattle Market, Battlefield Road, Shrewsbury    | £0.3         | £0.0         | -            | <b>£0.3</b>  | £0.3         | £0.0         | -            | <b>£0.3</b>  | £0.3         | £0.0         | -            | <b>£0.3</b>  |
| Tesco Superstore, Station Drive, Ludlow                     | £0.0         | £0.0         | -            | <b>£0.0</b>  | £0.0         | £0.0         | -            | <b>£0.0</b>  | £0.0         | £0.0         | -            | <b>£0.0</b>  |
| Other Outside Study Area                                    | £0.4         | £0.5         | -            | <b>£0.9</b>  | £0.4         | £0.5         | -            | <b>£0.9</b>  | £0.4         | £0.5         | -            | <b>£1.0</b>  |
| <b>Total Outside Study Area</b>                             | <b>£7.1</b>  | <b>£1.6</b>  | -            | <b>£8.7</b>  | <b>£7.5</b>  | <b>£1.6</b>  | -            | <b>£9.1</b>  | <b>£7.8</b>  | <b>£1.7</b>  | -            | <b>£9.4</b>  |
| Internet / Delivery   | £2.4         | £0.2         | -            | <b>£2.6</b>  |              |              | -            |              |              |              | -            |              |
| <b>Total</b>  | <b>£48.7</b> | <b>£25.1</b> | <b>£12.9</b> | <b>£86.6</b> | <b>£48.6</b> | <b>£25.0</b> |              | <b>£86.9</b> | <b>£50.6</b> | <b>£26.1</b> |              | <b>£90.5</b> |

Main food and top-up spending calculated using market shares set out in Table 2

Inflow derived from Table 7b of appendices to Powys Retail Study Update 2015

Retail Need and Impact Assessment  
Proposed New Aldi Store at Newtown

Table 4: Turnover of the Proposed Development

| Sales Floorspace (sq m) |            |             | Sales Density (£/sq.m) | Turnover (£ m) |       |       |       |       |
|-------------------------|------------|-------------|------------------------|----------------|-------|-------|-------|-------|
| Total                   | Comparison | Convenience |                        | 2019           | 2020  | 2021  | 2022  | 2023  |
| 1,315                   | 263        | 1,052       | £10,190                | £10.7          | £10.8 | £10.8 | £10.9 | £10.9 |

Assumes convenience goods sold from 80% of sales floorspace

Sales Density Derived from Mintel Retail Rankings

Retail Need and Impact Assessment  
Proposed New Aldi Store at Newtown

Table 5: Trading Performance of Existing Stores

| Destination                    | Survey Derived Turnover (£ m) |               |               | Convenience Sales Area (sq.m) | Sales Density (£ / sq. m) | Benchmark Turnover (£ m) |               |               | Overtrading (£ m) |              |               |
|--------------------------------|-------------------------------|---------------|---------------|-------------------------------|---------------------------|--------------------------|---------------|---------------|-------------------|--------------|---------------|
|                                | 2019                          | 2021          | 2023          |                               |                           | 2019                     | 2021          | 2023          | 2019              | 2021         | 2023          |
| Lidl, Llanidloes Road, Newtown | £13.14                        | £13.69        | £14.26        | 1,096                         | £9,652                    | £10.58                   | £10.70        | £10.74        | £2.57             | £3.00        | £3.52         |
| Morrisons, Pool Road, Newtown  | £20.46                        | £21.36        | £22.24        | 1,520                         | £13,178                   | £20.03                   | £20.25        | £20.33        | £0.43             | £1.11        | £1.91         |
| Tesco, Pool Road, Newtown      | £15.98                        | £16.57        | £17.26        | 1,927                         | £11,698                   | £22.54                   | £22.79        | £22.88        | £-6.56            | £-6.22       | £-5.62        |
| Newtown Town Centre            | £6.51                         | £6.65         | £6.92         | 1,168                         | £3,575                    | £4.18                    | £4.22         | £4.24         | £2.33             | £2.43        | £2.69         |
| Other Stores Newtown           | £1.58                         | £1.60         | £1.66         | 830                           | £3,575                    | £2.97                    | £3.00         | £3.01         | £-1.39            | £-1.41       | £-1.35        |
| Local Shops, Bishops Castle    | £4.94                         | £5.05         | £5.26         | 631                           | £3,575                    | £2.26                    | £2.28         | £2.29         | £2.68             | £2.77        | £2.97         |
| Local Shops, Caersws           | £2.53                         | £2.55         | £2.66         | 281                           | £3,575                    | £1.00                    | £1.02         | £1.02         | £1.52             | £1.54        | £1.64         |
| Local Shops, Llanidloes        | £7.48                         | £7.65         | £7.97         | 908                           | £3,575                    | £3.25                    | £3.28         | £3.30         | £4.23             | £4.37        | £4.67         |
| Local Shops, Montgomery        | £1.30                         | £1.31         | £1.36         | 458                           | £3,575                    | £1.64                    | £1.65         | £1.66         | £-0.34            | £-0.35       | £-0.30        |
| Local Shops Churchstoke        | £1.38                         | £1.41         | £1.47         | 307                           | £3,575                    | £1.10                    | £1.11         | £1.12         | £0.28             | £0.30        | £0.36         |
| <b>Total</b>                   | <b>£75.30</b>                 | <b>£77.84</b> | <b>£81.07</b> | <b>9,126</b>                  | <b>-</b>                  | <b>£69.54</b>            | <b>£70.30</b> | <b>£70.59</b> | <b>£5.76</b>      | <b>£7.54</b> | <b>£10.48</b> |

Sales area taken from Powys Retail Study Update 2015 and VOA data

Sales density taken from Mintel Retail Rankings 2018 and Powys Retail Study Update 2015

Growth in sales density calculated using growth rates set out in figure 4a of Experian Retail Planner Briefing Note 16

Retail Need and Impact Assessment  
Proposed New Aldi Store at Newtown

Table 6: Capacity

|                                       | 2021   | 2023   |
|---------------------------------------|--------|--------|
| Available Expenditure at Market Share | £77.84 | £81.07 |
| Benchmark Performance                 | £70.30 | £70.59 |
| Capacity at Current Market Share      | £7.54  | £10.48 |
| Leakage                               | £9.07  | £9.45  |
| Total Capacity                        | £16.61 | £19.93 |

Retail Need and Impact Assessment  
Proposed New Aldi Store at Newtown

Table 7: Trade Diversion

| Destination  | Trade Diversion |               |               |
|--|-----------------|---------------|---------------|
|  | %               | 2021          | 2023          |
| <b>Inside Study Area</b>   |                 |               |               |
| Lidl, Llanidloes Road, Newtown   | 15.74%          | £1.71         | £1.71         |
| Morrisons, Pool Road, Newtown  | 25.83%          | £2.80         | £2.81         |
| Tesco, Pool Road, Newtown  | 16.80%          | £1.82         | £1.83         |
| Newtown Town Centre  | 3.73%           | £0.40         | £0.41         |
| Other Stores Newtown   | 0.25%           | £0.03         | £0.03         |
| Local Shops, Bishops Castle  | 3.04%           | £0.33         | £0.33         |
| Local Shops, Caersws   | 0.51%           | £0.06         | £0.06         |
| Local Shops, Llanidloes  | 4.45%           | £0.48         | £0.48         |
| Local Shops, Montgomery  | 0.20%           | £0.02         | £0.02         |
| Local Shops Churchstoke  | 0.79%           | £0.09         | £0.09         |
| <b>Total Study Area</b>  | <b>71.35%</b>   | <b>£7.73</b>  | <b>£7.76</b>  |
| <b>Outside Study Area</b>  |                 |               |               |
| Aldi, Station Crescent, Llandrindod Wells                                  | 1.42%           | £0.15         | £0.15         |
| Tesco, Waterloo Road, Llandrindod Wells                                    | 0.28%           | £0.03         | £0.03         |
| Aldi, Mill Lane, Welshpool   | 3.18%           | £0.34         | £0.35         |
| Morrisons, Berriew Street, Welshpool                                       | 1.77%           | £0.19         | £0.19         |
| Sainsbury's, Brook Street, Welshpool                                       | 0.22%           | £0.02         | £0.02         |
| Tesco, Smithfield Road, Welshpool  | 3.16%           | £0.34         | £0.34         |
| Aldi, Station Drive, Ludlow  | 0.08%           | £0.01         | £0.01         |
| Asda, Malinsgate, Telford  | 0.03%           | £0.00         | £0.00         |
| Asda, Old Potts Way, Shrewsbury  | 0.54%           | £0.06         | £0.06         |
| Sainsbury's Superstore, Meole Brace Retail Park, Hereford Road, Shrewsbury | 0.54%           | £0.06         | £0.06         |
| Tesco Extra, Cattle Market, Battlefield Road, Shrewsbury                   | 0.48%           | £0.05         | £0.05         |
| Tesco Superstore, Station Drive, Ludlow                                    | 0.03%           | £0.00         | £0.00         |
| Other Outside Study Area   | 0.79%           | £0.09         | £0.09         |
| <b>Total Outside Study Area</b>  | <b>12.52%</b>   | <b>£1.36</b>  | <b>£1.36</b>  |
| Inflow   | 16.13%          | £1.75         | £1.76         |
| <b>Total</b>   | <b>100.00%</b>  | <b>£10.84</b> | <b>£10.88</b> |

Diversion based upon current market share, weighted to favour main food shopping destinations

Retail Need and Impact Assessment  
Proposed New Aldi Store at Newtown

Table 8: Impact

| Destination                    | Survey Turnover (£ m) |               |               | Trade Diversion |               | Residual Turnover |               | Impact  |         |
|--------------------------------|-----------------------|---------------|---------------|-----------------|---------------|-------------------|---------------|---------|---------|
|                                | 2019                  | 2021          | 2023          | 2021            | 2023          | 2021              | 2023          | 2021    | 2023    |
| <b>Inside Study Area</b>       |                       |               |               |                 |               |                   |               |         |         |
| Lidl, Llanidloes Road, Newtown | £13.14                | £13.69        | £14.26        | £1.71           | £1.71         | £11.99            | £12.55        | -12.46% | -12.01% |
| Morrisons, Pool Road, Newtown  | £20.46                | £21.36        | £22.24        | £2.80           | £2.81         | £18.56            | £19.43        | -13.11% | -12.63% |
| Tesco, Pool Road, Newtown      | £15.98                | £16.57        | £17.26        | £1.82           | £1.83         | £14.75            | £15.43        | -10.99% | -10.59% |
| Newtown Town Centre            | £6.51                 | £6.65         | £6.92         | £0.40           | £0.41         | £6.24             | £6.52         | -6.08%  | -5.86%  |
| Other Stores Newtown           | £1.58                 | £1.60         | £1.66         | £0.03           | £0.03         | £1.57             | £1.63         | -1.72%  | -1.66%  |
| Local Shops, Bishops Castle    | £4.94                 | £5.05         | £5.26         | £0.33           | £0.33         | £4.72             | £4.93         | -6.53%  | -6.30%  |
| Local Shops, Caersws           | £2.53                 | £2.55         | £2.66         | £0.06           | £0.06         | £2.50             | £2.60         | -2.16%  | -2.08%  |
| Local Shops, Llanidloes        | £7.48                 | £7.65         | £7.97         | £0.48           | £0.48         | £7.17             | £7.48         | -6.30%  | -6.07%  |
| Local Shops, Montgomery        | £1.30                 | £1.31         | £1.36         | £0.02           | £0.02         | £1.29             | £1.34         | -1.68%  | -1.62%  |
| Local Shops Churchstoke        | £1.38                 | £1.41         | £1.47         | £0.09           | £0.09         | £1.33             | £1.39         | -6.09%  | -5.87%  |
| Claw-Back                      | -                     | -             | -             | £1.36           | £1.36         | -                 | -             | -       | -       |
| Inflow                         | -                     | -             | -             | £1.75           | £1.76         | -                 | -             | -       | -       |
| <b>Total Study Area</b>        | <b>£75.30</b>         | <b>£77.84</b> | <b>£81.07</b> | <b>£10.84</b>   | <b>£10.88</b> | <b>£70.11</b>     | <b>£73.31</b> | -       | -       |

## Appendix 2 – Study Area Plan

---

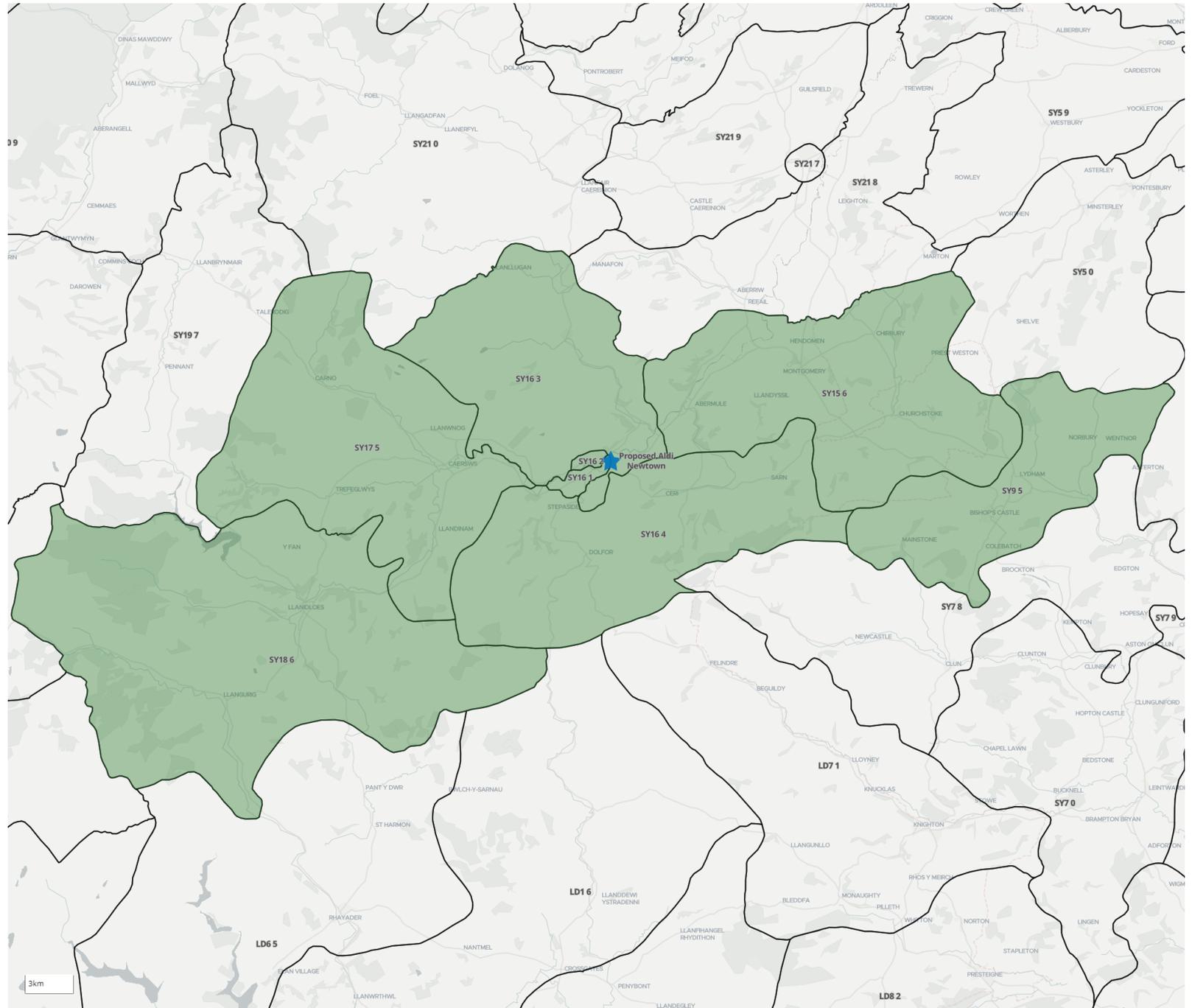


### Travel Times:

- 0 to 5 minutes
- 5 to 10 minutes
- 10 to 15 minutes

### Unit Sizes:

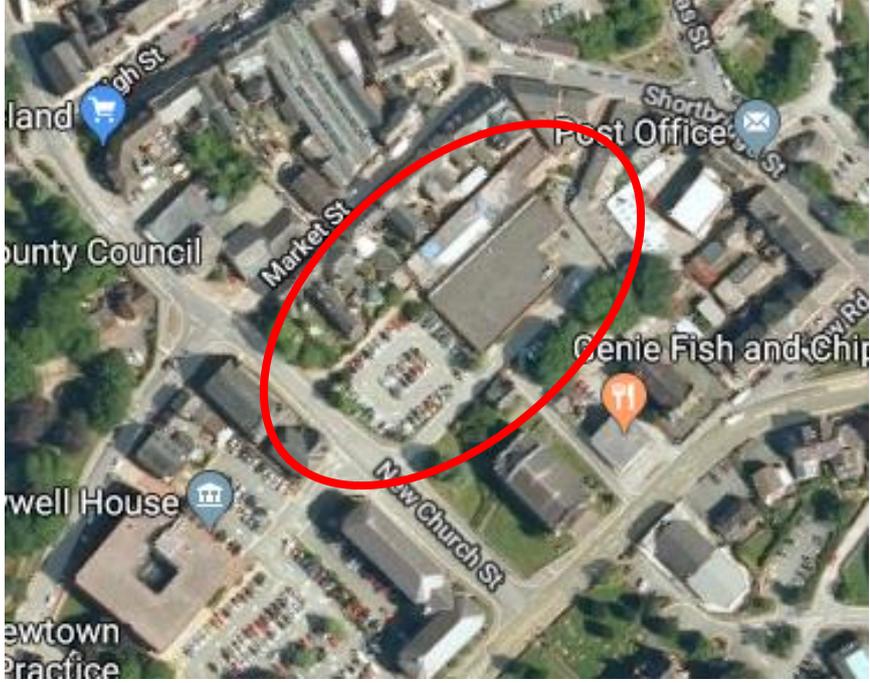
- Net Sales Area < 20,000 sq ft
- Net Sales Area 20,000 to 30,000 sq ft
- Net Sales Area > 30,000 sq ft
- PROPOSED ALDI NEWTOWN



## Appendix 3 - Sequential Site Details

---

## Sequential Test Site – Ladywell Shopping Centre

| 1: Site Name & Address   |   |
|--------------------------|---|
| Location Plan            |    |
| Site Area                | The site measures 0.3 hectares (including the associated car park)  |
| Site Description         | <p>The site comprises the Ladywell shopping centre and Ladywell car park.</p> <p>The site is located within Newtown Town Centre and comprises areas of Primary Shopping Frontage.</p> <p>The site is level and is accessed via New Church Street.</p> |
| Sequential Test Location | The site is located within the Town Centre as identified on Powys County Council’s Policy Map. For the purposes of a Retail Sequential Assessment, the site is considered to be in centre.  |

|                                     |  |
|-------------------------------------|--|
| <p>Policy Issues</p>                |  <p>The above extract is taken from the Powys Local Development Plan (2011 – 2026). The policies of relevance include:</p> <ul style="list-style-type: none"> <li>- Town Centre Area (Policy R1 and R3) which is identified by the pink and white hatched area.</li> <li>- Secondary Shopping Frontage (Policy R3) which is identified on the map as the light blue lines.</li> </ul>  |
| <p>Planning History</p>             | <p>A review of Powys County Council’s online planning application search has been undertaken and the following planning applications are considered to be of relevance:</p> <p>18/0571/FUL   Change of use of supermarket from A1 to B1 and refurbishment works (internal alterations and external changes to fenestrations and re-modelling the external works and carpark).<br/>Approved 24 December 2018</p> <p>19/1738/FUL   Proposed car park to include new access and all associated works. Pending Consideration</p> |
| <p>Ownership &amp; Availability</p> | <p>The Shopping Centre is currently undergoing major refurbishment to become the new headquarters of Quartix, a vehicle tracking supplier.</p> <p>Quartix has signed a lease with property owner EvaBuild Developments with the aim of bringing together under one roof more than 120 employees based in Newtown to allow for further growth.</p>  |

|                         |   |
|-------------------------|---|
| <b>Site Constraints</b> | A review of Natural Resources Wales long term flood risk map shows that the site falls within Flood Zone 2 and is therefore at a medium risk from flooding. |
|-------------------------|---|

## Sequential Test Site – Back Lane Car Park

| 1: Site Name & Address   |  |
|--------------------------|--|
| Location Plan            |   |
| Site Area                | The site measures 0.98 hectares  |
| Site Description         | <p>The site comprises of the Back Lane car park, a public pay and display car park to the north west of Newtown Town Centre. The car park is well used and located adjacent to the bus station.</p> <p>The car park is hard-surfaced and level and is accessed via Back Lane.</p> <p>The River Severn abuts the site to the north and west and currently development is underway to the east with hoarding present around the site adjacent to the east.</p> |
| Sequential Test Location | Back Lane Car Park is located adjacent to the Town Centre as identified on Powys County Council’s Policy Map. However, for the purposes of a Retail Sequential Test, the site is considered to be Edge of Centre.  |

|                                     |  |
|-------------------------------------|--|
| <p>Policy Issues</p>                |  <p>The above extract is taken from the Powys Local Development Plan (2011 – 2026). The site is wholly white land and has no specific allocation. Abutting the site to the east, the pink and white hatched area marks the extent of the Town Centre Area, whereby Policies R1 (New Retail Development) and R3 (Development within Town Centre Areas) are of relevance.</p> |
| <p>Planning History</p>             | <p>None available.</p>   |
| <p>Ownership &amp; Availability</p> | <p>The site is currently in active use as a car park and is owned and operated by Powys County Council.</p>  |
| <p>Site Constraints</p>             | <p>A review of Natural Resources Wales long term flood risk map shows that the site falls within Flood Zone 2 and is therefore at a medium risk from flooding.</p>   |

## Sequential Test Site – Phoenix Furniture

| 1: Site Name & Address   |  |
|--------------------------|--|
| Location Plan            |   |
| Site Area                | 0.34ha (including car park to the west)  |
| Site Description         | The site comprises of a former retail unit (currently occupied by Phoenix Furniture (517sq.m. Sales Area), and a 62 space car park. Newtown train station is approximately a 5 minute walks with mainline service on the Cambrian line from Shewsbury to Aberystwyth and Machylleth to Pwllheli. |
| Sequential Test Location | The former store is located within the Town Centre, but for the purposes of a Retail Sequential Test, the site is considered to be Edge of Centre.   |

|  |  |
|--|--|
| <p><b>Policy Issues</b></p>                |  <p>The above extract is taken from the Powys Local Development Plan (2011 – 2026). The policies of relevance include:</p> <ul style="list-style-type: none"> <li>- Town Centre Area (Policy R1 and R3) which is identified by the pink and white hatched area.</li> </ul> |
| <p><b>Planning History</b></p>             | <p>The most relevant planning application on the site is for the following application:</p> <p>P/2014/1251   Change of use of building from A1 (retail) to B8 (storage and distribution). Approved 23 April 2015</p>   |
| <p><b>Ownership &amp; Availability</b></p> | <p>The site is currently occupied by Phoenix Furniture and is therefore not considered to be available.</p>  |
| <p><b>Site Constraints</b></p>             | <p>A review of Natural Resources Wales long term flood risk map shows that the site falls within Flood Zone 1 and is therefore at a low risk from flooding.</p> <p>The site is small and there does not appear to be scope to expand to accommodate the type of development proposed by this application.</p>  |



#### JLL

1 Piccadilly Gardens  
Manchester M1 1RG  
+44 (0)161 828 6440  
+44 (0)161 828 6490

**Joanna Gabrilatsou**  
Regional Director

**0161**  
[joanna.gabrilatsou@eu.jll.com](mailto:joanna.gabrilatsou@eu.jll.com)

#### JLL

1 Piccadilly Gardens  
Manchester M1 1RG  
+44 (0)161 828 6440  
+44 (0)161 828 6490

**Yvette Black**  
Graduate Planner

**0161 828 6420**  
[yvette.black@eu.jll.com](mailto:yvette.black@eu.jll.com)

#### About JLL

JLL (NYSE: JLL) is a leading professional services firm that specializes in real estate and investment management. A Fortune 500 company, JLL helps real estate owners, occupiers and investors achieve their business ambitions. In 2016, JLL had revenue of \$6.8 billion and fee revenue of \$5.8 billion and, on behalf of clients, managed 4.4 billion square feet, or 409 million square meters, and completed sales acquisitions and finance transactions of approximately \$136 billion. At year-end 2016, JLL had nearly 300 corporate offices, operations in over 80 countries and a global workforce of more than 77,000. As of December 31, 2016, LaSalle Investment Management has \$60.1 billion of real estate under asset management. JLL is the brand name, and a registered trademark, of Jones Lang LaSalle Incorporated.

<https://internetadmin.jll.com/united-kingdom/en-gb>

**Jones Lang LaSalle**

©2018 Jones Lang LaSalle IP, Inc. All rights reserved. All information contained herein is from sources deemed reliable; however, no representation or warranty is made to the accuracy thereof.