Drivers Jonas Deloitte.

Herefordshire Council

Herefordshire Town Centres PPS4 Assessments

Paper 5. Town Centre Summaries and Planning Policy Review

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Contents

1 Introduction

Scope of Paper

1.1 In accordance with the Consultants' Brief dated June 2007, this is one of five Papers to form part of the evidence base supporting retail and town centre policies within the Herefordshire Local Development Framework (LDF). The majority of the technical work and surveys were undertaken in Autumn 2007. Any subsequent updates are referenced as such in the reports.

1.2 This Paper provides a summary of the performance of Hereford City Centre, principal market towns (Leominster, Ross-on-Wye, and Ledbury) and the smaller centres of Kington and Bromyard in Herefordshire.

1.3 In the second part of the Paper we comment on retail and town centre planning issues that are arise from the Study and that have implications for the emerging policies of the LDF DPDs.

2 Hereford City Centre

2.1 Hereford City Centre is a healthy and attractive centre which plays an important role in the retail hierarchy of the County and the Region. Overall, Hereford is a vital and viable city centre.

Role and Function

2.2 Hereford is the County town and dominant centre for shopping and a wide range of services for County residents.

2.3 Our assessment indicates that Hereford City attracts 75% of residents' comparison goods (non-food) spending from a Study Area, which broadly equates to the County. The principal competing centres for such clothing, footwear and fashion goods are the neighbouring County towns of Worcester and Gloucester.

2.4 Hereford also provides for the convenience goods (food) shopping needs of both City residents and residents of some of the surrounding rural areas. Residents from the south western part of the County in particular (where there is no nearby market town) use Hereford City for main food shopping trips. Our assessment indicates that Hereford City attracts 89% of residents' convenience goods spending from a catchment area based on the City and its environs and the rural areas to the west.

2.5 Hereford City is well served by the primary road network of the County as well as by public transport.

Retailing and Other Uses

2.6 Hereford is classified as a Regional Centre. The City Centre provides a wide range of comparison and convenience retailing with a good mix of national multiple retailers and independent stores. It also contains a large volume of services, including many banks, estate agents and financial services.

2.7 The primary retail area is centred on the mainly pedestrianised areas of High Town, High Street, Eign Gate and Commercial Street. There are a number of national multiple retailers located within these areas, including Marks & Spencer and W H Smiths. At the time of the original study, according to the Focus Town Centre Report (2007), Hereford City Centre included 65% of the top 20 retailers in their classification[1].

2.8 Independent retail also has created niche shopping streets offering a broader range of specialist items largely unavailable in the primary shopping area. Of particular note are the pedestrianised and historically important Church Street and Union Street.

1 *Ranked by ORC's forecast of average town centre sales for individual retailers within GB.*

2.9 Within the last two years however, Hereford has been affected by a number of high profile store closures. In addition to the nationwide loss of stores such as Zavvi and Priceless Shoes, the closure of Chadds Department Store emphasises both the financial challenges faced in the independent retail sector and potential floorspace constraints of historic buildings.

2.10 Consequently there has been a rise in the number of vacant units within the centre particularly along Commercial Street/Maylord Centre. Another area of particular concern is Bridge Street, which has shown a marked decline in occupation, with 12 vacant units as of the July 2010 survey. There remains however, 23 reported retailer requirements within Hereford as identified by Focus.

2.11 There is also a good spread of uses throughout the centre which contributes to a varied street scene and encourages footfall around the centre. Hereford hosts a wide range of non-retail facilities and activities including tourist attractions such as Hereford Cathedral, of importance to Hereford's role as a tourist destination.

Centre Environmental Quality

2.12 Much of Hereford's Central Shopping Area falls within a Conservation Area, which has helped maintain the centre as an attractive destination with a variety of architecturally interesting buildings. The centre benefits from extensive areas of pedestrianisation, especially in High Town where the open paved square accommodates seasonal outdoor cafes as well as being in use as an exhibition space.

2.13 Hereford's historic buildings add to the environmental quality of the City Centre as a shopping destination. However, many historic buildings are unsuited to the footplate requirements of large retailers. This can, nevertheless, be overcome through the amalgamation of units or through the creation of basement space as occurred with the Marks & Spencer unit.

2.14 The areas on the fringe of the centre facing the ring road have the lowest environmental quality. The ring road acts as a barrier to movement with limited at-grade crossing points. Locations facing the ring road are also affected by the noise and disturbance generated by passing traffic.

Outside Centre

2.15 Hereford contains no District Centres, but does have many Neighbourhood Shopping Areas containing small food stores, as identified in the Herefordshire UDP.

2.16 Within Hereford there are a number of large retail parks, such as Hereford Retail Park which contains circa 5,290 sq m. (gross) of Class A1 retail. In addition there are a number of standalone units, with Tesco, ASDA and Sainsburys all operating significant food stores.

Issues and Opportunities

2.17 On street surveys, commissioned by Drivers Jonas Deloitte reveal that visitors to Hereford City Centre have predominantly positive comments regarding the City Centre. When questioned as to what they would like to see more of in the City Centre, 21.2% of respondents wanted to see more non-food shopping, whilst 15.5% wanted more leisure uses. Discussions with local agents have also revealed concerns over the lack of interest in office floorspace within Hereford.

2.18 A key redevelopment opportunity, identified in the Herefordshire UDP and currently being pursued by the Council, is regeneration of the area known as the Edgar Street Grid comprising 43 hectares of land north of the ring road.

2.19 Although significant elements of capacity is forecast to be absorbed by the major retail proposals at Edgar Street Grid, there is additional capacity for new comparison (non food) floorspace in Hereford City which should increase the attractiveness of the City Centre as a whole as a shopping destination. The proposed foodstore at ESG does however mean that there is no quanitative need for additional convenience floorspace in Hereford City up to 2026.

3 Ross-on-Wye

Role and Function

3.1 Ross-on-Wye is located approximately 15 miles south east of Hereford and has good accessibility being at the junction of the A40 and Junction 1 of the M50 which connects the town to the wider national motorway network. It is also close to popular visitor areas in the Wye Valley and Forest of Dean.

3.2 The primary strength of the town is as a centre for food shopping with some 69% of residents of its catchment area using the town's two main supermarkets for their main food shopping. The town centre does also attract visitor spending, particular in the summer months. However, it is not strong as a centre for comparison (non-food shopping), retaining only 19% of catchment area residents shopping trips for clothing, footwear and other fashion goods.

3.3 Visitor spending in Ross on Wye is important. On-street surveys in the town centre indicated that in November 2007, 19% of respondents were visitors from beyond the Study Area. This proportion will be higher in the summer months.

Retailing and Other Uses

3.4 Ross-on-Wye is historically an important town centre for the local community and the tourist economy. The town centre accommodates a range of retail facilities alongside a range of non-retail facilities and activities which reflect the importance of tourism to the centre. The level of convenience retail in Ross-on-Wye is bolstered by the presence of a large Morrisons store within a short distance of the defined town centre boundary, an extension for which is currently under construction.

3.5 Our appraisal of the centre highlighted higher than average levels of vacancies, with some vacant units in prominent locations. Site visits undertaken by Drivers Jonas Deloitte in June 2010 revealed 27 vacant units, of which 12 were located on Brookend Street towards the fringes of the retail area. The majority are small in size, suggesting their size gives them limited commercial appeal, especially to national multiple retailers. This is coupled with a proliferation of discount stores and charity shops which serve to weaken the appearance and retail offer of the centre. There has however, been a notable rise in coffee shops within the centre, which have a positive effect on activity levels and increase visitor dwell times.

3.6 There are several national multiple retailers located within Ross-on-Wye, including W H Smiths, Boots and Argos. However, a deficiency noted in Drivers Jonas Deloitte on street surveys is that 43.3% of respondents stated that the choice of non-food retail facilities is poor.

Centre Environmental Quality

3.7 There are clear strengths within the centre. Ross on Wye town centre is generally of a high environmental quality and is a Conservation Area. The centre has a number of historic buildings and relatively limited number of buildings of poor architectural quality. Although the historic environment does create a largely attractive environment, if compared with some of the other historic market towns in Herefordshire such as Ledbury the general appearance of some parts of the town centre and buildings is tired and unkempt.

Outside Centre

3.8 The most significant shopping facilities outside the town centre are at Over Ross Park on the A40, where there are two large retail units occupied by Ross Labels and Focus Do It All. Ross Labels is a large department store offering a wide range of products, particularly clothing, in a factory outlet type format. The store incorporates a café and toilet facilities and appears to function as a tourist facility, in addition to providing a facility for the local community.

Issues and Opportunities

3.9 There is a danger of parts of the shopping centre deteriorating and threatening the standing of Ross-on-Wye in the local retail hierarchy and as a tourist centre.

3.10 There is a potential development site off Kyrle Street/Brookend Street. This site provides a good location for further retail development to enhance the vitality and viability of the northern part of the town centre. We understand that the Council has resolved to grant permission for an ALDI food store on the site.

3.11 There is limited expenditure capacity for new convenience (food) goods floorspace in the town. This will be absorbed in the early years of the plan-period by implementation of the ALDI food store.

3.12 Ross on Wye currently retains some 45% of residents' total comparison (non-food) goods expenditure from its catchment area. There is theoretical expenditure capacity to support more comparison goods floorspace in the town. However, achievement of new development will be dependent on retailer demand and the confidence of the market in the town as a retail destination for comparison goods shopping. The potential of the town as a destination for visitors is important and recent street improvements and the emergence of a 'café culture' in the shopping areas will serve to increase the attractiveness of the town to visitors.

4 Ledbury

Role and Function

4.1 Ledbury is located in the far east of the catchment area, circa 14 miles east of Hereford, and only 8 miles from Great Malvern to the north east outside the Study Area. The town benefits from being on Hereford – Worcester rail line with direct services to London and Birmingham.

4.2 The primary strength of the town is as a location for food shopping with circa 80% of residents of its catchment area using the town for main food shopping trips. Conversely the town attracts only a small proportion of catchment area residents shopping trips for clothing, footwear and other fashion goods – some 9.5%.

4.3 The role and character of Ledbury is illustrated by the relatively high proportion of residents' spending on personal and luxury goods recorded by the interview surveys – 42% compared with 22% attracted to Hereford.

Retailing and Other Uses

4.4 The retail area of the town centre is largely centred along The Homend/High Street with secondary provision located on intersecting streets.

4.5 Comparison and service uses dominate the overall mix of uses within Ledbury Town Centre. The town has a below average level of vacancy, with ten units in the centre vacant, of which two were under refurbishment. According to the Focus database, as of July 2010, there were six reported requirements for Ledbury.

4.6 Whilst the lack of national multiple retailers cause Ledbury to perform poorly in comparison rankings such as Venuescore, this deficiency should not be regarded only as a disadvantage. Much of Ledbury's character comes from its thriving independent retail provision; its attractiveness for residents' spending on personal and luxury goods has been noted above.

Centre Environmental Quality

4.7 The town centre falls within a Conservation Area and consequently contains high numbers of historic buildings incorporating many different historic periods. There are few signs of anti-social behaviour such as graffiti and vandalism

4.8 The historic layout of the town, whilst enhancing the environmental quality of the town centre, also places constraints on the centre. The Conservation Area status makes development opportunities for stores which meet modern requirements hard to find. Whilst this could have implications for the ongoing vitality and viability of the centre, the historic environment also creates the character of Ledbury, which is appealing for residents and visitors.

Outside Centre

4.9 There are three large freestanding units outside Ledbury Town Centre – a Tesco store 2,137 sq m (gross) close to the town centre, Homebase and Countrywide Farmers Country Store. The Tesco predominantly retails convenience goods and contains a café. It does not contain ranges of clothing or household and bulky goods.

Issues and Opportunities

4.10 In-centre interview surveys have highlighted a desire for more comparison shopping and concerns about the provision and quality of car parking.

4.11 From our appraisal of the centre, the key area with development potential lies along Bye Street. Indeed a recent retail development has come forward and the former car park on Bye Street/Market Street has been redeveloped. We understand that further car parking is available off Bye Street and that there may therefore be development potential (although limited) in this area of the town centre.

4.12 Ledbury retains a high proportion of residents' available convenience goods (food) expenditure, but has limited potential for new convenience goods floorspace until 2016, some 650 sq m (gross), which will increase up to 1,581 sq m (gross) over the forecast period. There is limited theoretical capacity for new comparison goods floorspace, but the town's popularity and attractiveness as a 'niche' centre (particularly for visitors) could draw new retailers into the town.

5 Leominster

Role and Function

5.1 Leominster is located in the north of the catchment area 14 miles north of Hereford, and roughly equidistant from Bromyard and Kington. The town plays an important role within its catchment area for both convenience and comparison goods shopping trips.

5.2 Although the town draws a high proportion of convenience goods (food) spending from its catchment area - some 86% - the major part of this is to the out-of-centre Morrisons store - 60%. The majority of catchment area residents' spending on clothing, footwear and other fashion goods is attracted to Hereford, with only some 17.4% using Leominster. However, Leominster does attract much higher proportions of spending on other forms of comparison goods, for example DIY / decorating supplies 66%, and personal and luxury goods 43%.

Retailing and Other Uses

5.3 Leominster contains a good variety of retail provision within the town centre. Unlike some of the other regional centres within Herefordshire, there is a good mix of national multiple retailers including Boots, WH Smiths (which has replaced Woolworths) and Lloyds Pharmacy, alongside specialist independent stores selling a range of goods including discount goods, antiques, gifts and independent delicatessens and butchers. This leads to a vibrant town centre offer.

5.4 In terms of national convenience retailers, a Somerfield store is located within the town centre off Dishley Street. In addition, there is an Aldi store located adjacent to the defined town centre boundary.

5.5 Based on information obtained from the Focus database in July 2010, there were six reported retail requirements for Leominster. These requirements include major national operators such as The Works and Edinburgh Woollen Mill. A Drivers Jonas Deloitte site visit in June 2010 revealed that there has recently been a reduction in vacancies from 18 in 2007 to only 12 units currently vacant.

Centre Environmental Quality

5.6 As with the other market towns in Herefordshire, Leominster Town Centre is designated as a Conservation Area. Much of the town centre is of good environmental quality and contains a range of historic buildings and a relatively limited number of buildings of poor architectural quality. The layout of the streets reflects the town's historic character, and as a result some streets such as High Street are narrow and appear enclosed. There are several traffic free areas in Leominster.

5.7 In general, away from the town centre fringes, the core shopping area has a pleasant streetscape creating an attractive retail environment.

Outside Centre

5.8 The major out-of-centre shopping facility is a Morrisons food store 3,340 sq m. (gross) located approximately one mile to the west of the town centre. A circa 365 sq.m. extension of the store is currently under construction. In addition to the on-site petrol station, the store offers a range of services including a dry cleaners, café and photo processing laboratory.

Issues and Opportunities

5.9 On-street interview surveys identified concerns over cleanliness and upkeep of the centre and also a desire for more comparison shopping and leisure facilities.

5.10 We note that Leominster has some scope for further development. Land on the south western fringes of the town centre on either side of Westbury Street could offer long term potential. Also the Burgess Street car park in the centre of the town, surrounded by other retail units, could provide some redevelopment potential, if the car parking were re-provided elsewhere on the edge of the town centre.

5.11 Leominster exerts a draw within its catchment area for convenience (food) shopping, and our assessment indicates expenditure potential for new convenience goods floorspace within the town, which will increase over time. Some of this will be taken up by the consented extension of Morrison's (not included within our quantitative assessment). Similarly there is expenditure potential for new comparison goods floorspace, but achievement of new development will be dependent on retailer demand and the confidence of the market in the town as a retail destination for comparison goods shopping.

6 Bromyard

Role and Function

6.1 Bromyard is located in the north east of the catchment, circa 15 miles from Hereford. Although the town is a similar distance from Worcester to the east, the presence of the A44 which runs through Bromyard provides goods links with Worcester.

6.2 The primary strength of the town is as a centre for food shopping with some 44% of residents of its catchment area using the Co-Operative store on the edge of the town centre. Hereford and Leominster are the most popular alternative locations for main food shopping.

6.3 The most popular locations for residents' shopping trips for clothing, footwear and other fashion goods are Hereford followed by Worcester. Similarly, Hereford (followed by Worcester) is the most popular location for other forms of comparison goods spending, including DIY / decorating supplies and personal and luxury goods.

Retailing and Other Uses

6.4 Bromyard Town Centre performs an important function for its catchment. It has a diverse range of town centre uses in an attractive environment. There is a good level of convenience retailing in the town centre, reflecting the town centre's role for residents' day-to-day shopping.

6.5 The town centre is dominated by a mixture of small independent shops, service outlets and non-retail uses with very few national retailers present. The range of goods in the centre is somewhat limited, and many facilities are dispersed within the secondary shopping frontages. There are also several other town centre uses such as the Time Machine Museum aimed at attracting visitors.

6.6 A site visit in July 2010 indicated a reduction in the number of vacant units in the town (from 10 units in 2007 to seven units). Some of these units were being used as part of a heritage trail through the town, in an attempt to 'soften' the visual impact of vacancies in prime positions.

Centre Environmental Quality

6.7 The town centre is encompassed by a designated Conservation Area. The town centre has an attractive built form that has retained its historic character. As the shopping area follows the main road, there is inevitable impact from traffic volume, although on the whole there is a pleasing environmental quality which complements Bromyard's retail character.

Issues and Opportunities

6.8 On-street interview surveys identified concerns over the level of provision of comparison and convenience shopping, places to eat and drink, and leisure facilities. Quality of car parking was also a concern.

6.9 Land to the south of the town centre boundary and to the north of the A44 may have long term development potential. Part of this is currently occupied by a garage. New development in this location could assist the vitality and viability of the Broad Street area of the town centre.

6.10 Our assessment indicates that Bromyard has no expenditure capacity for additional convenience (food) floorspace until 2026. Also the town retains a low market share of comparison (non-food) spending, with a high proportion of residents visiting other centres for their comparison goods purchases, particularly Hereford City. As with the other market towns, achievement of any new retail development will be dependent on retailer demand and the confidence of the market in the town as a retail destination for comparison goods shopping.

7 Kington

Role and Function

7.1 Kington is the most geographically isolated of the market towns, located in the north west of the catchment area close to the Welsh border. The town is located circa 20 miles from Hereford and 13 miles west of Leominster.

7.2 The primary strength of Kington is as a centre for food shopping with some 60% of residents of its catchment area using the food stores in the town, of which the Co-Operative store on the edge of the town centre is the most popular facility. Morrisons on the western side of Leominster is the most popular alternative location attracting 24% of main food shopping trips.

7.3 For comparison goods shopping Hereford was the most popular destination location with clothing, footwear and fashion goods attracting 62% of trips compared with 22% attracted to Kington. Similarly Hereford is the most popular destination for foe other forms of comparison goods shopping.

Retailing and Other Uses

7.4 Despite relative geographical isolation constraints, the town does provide a good range of shops and services, especially in its selection of independent and national convenience retailers.

7.5 The convenience units are generally small units which predominantly cater for the day-to-day convenience needs of the local population. Representation by comparison retailers, as is to be expected for lower order centres, is well below the national average.

7.6 Because of the large number of independent retailers, irregular opening hours of some stores is noticeable.

7.7 A site visit in July 2010 noted there are currently seven vacant units in Kington. Discussions with local agents indicate that although Kington receives a lot of interest from potential occupiers, securing an occupier seems to be more difficult and takes longer than in other centres. Demand for units is (and is likely to remain), from independent companies and start-up businesses rather than from national retailers.

Centre Environmental Quality

7.8 Kington's compact and linear town centre is of good environmental quality. However, restrictions on street parking suggest that traffic flow is prioritised above the shopping environment along High Street. This is further emphasised by the absence of dedicated crossings. Similarly the narrow pavements could negatively impact on pedestrian movement during peak times. Outside of the shopping areas there is a noticeable decline in the environmental quality with many buildings looking in need of refurbishment.

Issues and Opportunities

7.9 On-street interview surveys highlighted concerns about the quality of comparison retailing, and places to eat/drink. They also identified a desire for more leisure facilities and comparison retailing.

7.10 The majority of retail provision in Kington town centre is located on the main High Street and along Bridge Street. To the south of High Street is an existing car park accommodating circa 80 spaces. This lies adjacent to the Co-op store and provides a potential area for further development, within the town centre boundary. Additionally, full planning permission was granted on appeal in 2003 for retail development on a site at 20 Bridge Street, but the site was not developed and the consent has now expired.

7.11 Convenience food stores in Kington are trading well and there appears to be theoretical expenditure capacity for some new convenience floorspace. However, the lapsed consent at Bridge Street suggests limited market interest in the town.

7.12 Kington retains a very low market share of comparison (non-food) goods expenditure, some 9% only and experiences heavy expenditure outflows to Hereford City. Similar to Bromyard, achievement of any new retail development will be dependent on retailer demand and the confidence of the market in the town as a retail destination for comparison goods shopping.

8 Policy Review

8.1 Much of this Study has focussed on issues relating to the six towns individually. In this Paper we comment on certain retail planning policy issues that are of relevance to the County as a whole.

8.2 It has not been part of our remit to recommend town centre and retail policies for the emerging Core Strategy, Hereford Area Plan or Market Towns and Rural Areas Plan. However, our Study has enabled us to draw some conclusions on policy issues that are of relevance to the LDF. Our comments are made with reference to some of the policies in the existing UDP, to which we refer below.

8.3 We have referred in Paper 1 to the guidance in PPS4 Planning for Sustainable Economic Growth, Policy E3 of PPS4 identifies matters that should be addressed by regional planning bodies and local planning authorities as part of their plan-making role when planning for centres. The subsequent abolition of regional planning bodies places a greater onus on the local planning authorities to address the strategic issues. Relevant matters (identified in Paper 1) include:

- § defining a network and hierarchy of centres;
- § making choices about which centres will accommodate any identified need;
- § considering appropriate actions for centres in decline, including the scope for consolidating and strengthening these centres; or reclassifying centres at a lower level and allowing retail units to change to other uses;
- § defining the extent of centres, primary shopping areas, and distinguishing between primary and secondary frontages making clear which uses will be permitted in such locations;
- § setting floorspace thresholds for the scale of edge-of-centre and out-of-centre development that should be subject to an impact assessment under (EC16.1) and the geographic areas within which these thresholds will apply;
- § encouraging residential or office development above ground floor retail, leisure or other facilities within centres; and
- § identifying sites or buildings within existing centres suitable for development.

8.4 The above are all matters which should be addressed in the LDF, and for which policies should be brought forward as appropriate. Our comments below relate to the considerations applying in Herefordshire in respect of these policy matters.

County Retail Hierarchy

8.5 This is set out in the UDP, with Hereford being defined as ‘Sub Regional Shopping Centre’, and Bromyard; Ledbury; Leominster; Kington; Ross-on-Wye being defined as ‘Market Towns’. There are also categories for ‘Local Shopping Centres’, ‘Neighbourhood Centres’ (within the urban area of Hereford) and ‘Village Shops’.

8.6 We support in principle the identification of a retail hierarchy and have no immediate comments on the hierarchy set out in the UDP. We would be happy to consider any specific issues in respect of the hierarchy if these arise.

Identifying Need

8.7 We have identified shopping and other needs for each centre in quantitative and qualitative terms. Quantitative estimates of shopping need are provided in Paper 4. Key inputs to the quantitative shopping need forecasts are population growth within Hereford City and the market towns, and national retail expenditure trends. The former will be directly linked to the population and housing growth strategy of the LDF. The latter is a function of the performance of the national economy and should be monitored over the life of the Plans, see Section 9 below.

Hereford City

8.8 It is important to note in respect of Hereford City that the quantitative shopping need forecasts relate to the City as a whole. This is because, in our opinion, it is for planning policy to determine appropriate locations for new shopping facilities.

8.9 In respect of comparison goods, the priority location for new development should be the City Centre. However, it may be that some exceptions are justifiable, either through specific development plan policies or through the exercise of development control.

8.10 Significant scope for new comparison goods floorspace has been identified within the City. There are also proposals afoot for major new shopping development within the Edgar Street area at the Livestock market. It should be noted the quantitative comparison goods forecasts for Hereford City (Paper 4) are based on the City maintaining a constant market share of available expenditure from its catchment area. Any major new shopping proposals that materially enhance the attractiveness of the City as a shopping destination as compared with its competitors may warrant this assumption to be reconsidered (the market share of available expenditure attracted to the City could rise).

8.11 Hereford City has strong convenience shopping facilities within and on the edge of the City Centre. The convenience shopping function of the City Centre is important as part of its overall shopping offer, but some new convenience shopping facilities will also need be provided within any new major residential expansion areas.

Market Towns

8.12 We believe that the market towns are too small to justify the inclusion of shopping floorspace requirements as a matter of policy. Such estimates are broad-brush and in our opinion can only be meaningful and a useful policy tool in the larger centres. The UDP currently provides quantified shopping floorspace requirements for Hereford City Centre only and not the market towns, which we believe to be the appropriate approach.

Actions for Centres in Decline

8.13 There is evidence in some centres of a lack of demand for town centre uses, in frontages that previously contained such uses. Any town centre frontage policies should recognise this issue and where appropriate facilitate a change of use to more appropriate uses.

Town Centre Boundaries, Areas and Frontages

8.14 The UDP defines town centre boundaries and Central Shopping and Commercial Areas (CSCAs) for Hereford and the market towns. We support the identification of such boundaries as they are of particular importance in applying the requirements of the sequential approach.

8.15 Policies TCR3 – TCR7 of the UDP identify and / or apply policy requirements to shopping frontages within the CSCAs. We support the identification and definition of shopping frontages within centres as is appropriate to their size and function. We note for example that in Bromyard no primary frontage is provided for because of its small size, form and function.

8.16 We have commented in Paper 2 on the performance of primary and secondary frontages within Hereford City Centre and the market towns. It will be appropriate for the Area Plans to reappraise the geographic extent of the defined frontages having regard to their performance in retail terms and other policies of the DPDs.

8.17 Careful consideration should also be given to the policy requirements that are applied within the defined frontages. Furthermore, it may be appropriate to vary such requirements between centres according to prevailing circumstances and local needs. For example, some types of non A1 facility e.g. coffee bars and cafés, can create additional footfall and add to the attractiveness and vitality of a shopping street. This may be the case in particular in small towns such as in Herefordshire with a visitor clientele.

Floorspace Thresholds for Impact Assessments

8.18 One of the major changes within PPS4 is removal of the previous PPS6 obligation requiring applicants for retail developments in 'edge-of-centre' and 'out-of-centre' locations to demonstrate 'need'; and replacement of this obligation by a more wide-ranging 'impact' test. Impact considerations have therefore become of greater importance in determining the acceptability or otherwise of retail development proposals (as well as proposals for other town centre uses) in non-central locations. In this context it is important, at the plan-making stage, to have regard to PPS4 guidance on 'impact'.

8.19 The principal guidance specifying the tests required of applications for planning permission for town centre uses not in a centre is set out in Policy EC16. However, it is necessary also to have regard to Policy EC14, which says:

"EC14.4 An assessment addressing the impacts in policy EC16.1 is required for planning applications for retail and leisure developments over 2,500 square metres gross floorspace or any local floorspace threshold set under policy EC3.1.d not in an existing centre and not in accordance with an up to date development plan.

EC14.5 An assessment addressing the impacts in policy EC16.1 is required for planning applications for retail and leisure developments over 2,500 square metres gross floorspace or any local floorspace threshold set under policy EC3.1.d not in an existing centre and not in accordance with an up to date development plan."

8.20 It is evident from the above that in the absence of any requirements to the contrary identified in the development plan, an applicant for planning permission for retail development (or other town centre uses) outside a centre would not be required to satisfy the impact tests set out in PPS4 Policy EC16. We believe it is important that the relevant DPDs specify the floorspace thresholds to which the PPS4 impact requirements should apply. In the smaller Herefordshire centres in particular we believe that this should be less than 2,500 sq m gross. It may also be that DPDs will identify additional impact test requirements relating to the specific circumstances of centres.

Upper Floor Uses

8.21 Hereford City and the market towns are historic centres, overwhelmingly made up of historic buildings in which upper floor use can make an important contribution to the appearance, functioning and vitality of the centre.

8.22 Polices should therefore maximise the opportunity for use of upper floors for appropriate uses, in particular residential, office, and leisure uses.

Retail Proposals on Unallocated Sites

8.23 Policy EC5 of PPS4 indicates the matters that should be addressed at the plan-making stage in identifying sites to accommodate the need for town centre use that has been identified. Our study of the Herefordshire centres accords with this guidance, and comments on potential development sites.

8.24 Plainly proposals will come forward during the plan-period for town centre uses outside centres that are not allocated for development in the development plan. It will be important therefore for relevant DPDs to contain policies that indicate the criteria against which such proposals are to be judged. Policy TCR9 is the relevant policy in the current UDP.

8.25 In respect of TCR9 as currently worded, we make the following comments. First, the policy currently applies to ‘large scale’ developments only. In our opinion it would be desirable to specify a floorspace threshold to which the new DPD policies apply, which we presume would be the same as for ‘impact’, on which we have commented above. In respect of extensions, PPS4 Policy EC14.3A applying to ‘sequential approach’, requirements defines a gross floorspace threshold of 200 square metres. This definition could be adopted or varied for the purpose of an updated Policy TCR9.

8.26 Criterion 1 of Policy TCR9 requires ‘need’ to be demonstrated, which we presume will be removed so as to accord with PPS4 guidance.

8.27 We have no additional comments to make at his stage on the other criteria specified in Policy TCR9. However, as noted above, impact is now a key determinant of the acceptability or otherwise of applications for town centre uses outside centres, and it will therefore be desirable to consider the various forms of impact that could arise in the different Herefordshire centres and the extent to which these should be included within development plan policy. The criteria set out in Policies EC10.2 and EC16 of PPS4 cover a wide range of impact considerations, including for example employment, regeneration, and social inclusion.

9 Study Monitoring and Review

9.1 With a report of this nature there are a wide range of inputs, many of which will be subject of variation over time. We have endeavoured to make our analysis as transparent as possible, so that the inputs are readily identifiable and capable of revision in the future should this be appropriate. Inputs that may change and that can be monitored and reviewed include the following.

9.2 The population forecasts are derived from the anticipated level of housing development across the County. The current strategy (agreed under the development of the Regional Spatial Strategy 2006-26) is for 18,000 new dwellings (net) to be built across Herefordshire between 2006 and 2026. We are aware that this could change as the Core Strategy goes through its various statutory stages.

9.3 Retail expenditure growth rates are notoriously difficult to predict. This has been illustrated in the last 18 months when the forecasts from Experian have varied widely, as they have sought to understand and make judgements on the implications of the economic recession. In section 12 we have explained the justification for the forecast rates that we have used. We have also stated that the period post 2016 is subject of the greatest uncertainty. It will be desirable to monitor changing expenditure growth rates at appropriate future intervals.

9.4 It will also be possible and appropriate to input future commitments that emerge over time.

9.5 Finally it needs to be borne in mind that quantitative forecasts can only be broad-brush and should be interpreted as such. A more precise measurement of capacity and impact can only be made in the context of specific proposal, where more reliable estimates can be made of the particular trading characteristics and an assessment of the impacts of the proposal can be made.