Planning Potential

Planning and Retail Statement

Fleet Street, Holbeach



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1. Introduction

1.1. This Planning and Retail Statement has been prepared by Planning Potential on behalf of Aldi Stores Ltd ('the applicant'). The application seeks full planning permission for the construction of an Aldi foodstore (Use Class E) together with car parking, landscaping, and associated works at Fleet Street, Holbeach.

1.2. The proposals represent a multi-million-pound investment at an unprecedented time for the UK economy, in particular for the retail sector. The application site is a significant regeneration opportunity of brownfield land in a highly accessible and sustainable location in Holbeach. The proposals will enhance the existing District Centre offer, comprehensively redeveloping a brownfield site for economic development and generate wider benefits for the town through the creation of added footfall and linked trips with the District Centre. The proposals will enhance convenience choice and competition in the marketplace, delivering significant quantitative and qualitative improvements and enable more sustainable shopping patterns.

1.3. The application site is a significant development opportunity, on a site that extends to approximately 0.86 hectares, located to the south of Fleet Street. Fleet Street dissects Holbeach, running west-east through the District Centre within the settlement boundaries of Holbeach, with residential properties around the periphery of the site.

1.4. Proposals for an Aldi foodstore at this location represents the re-use of a brownfield site in line with national policy (NPPF paragraph 117) and represents a viable and deliverable regeneration opportunity including significant landscape and streetscape improvements. The proposals can be summarised as follows:

- A standalone retail foodstore building offering 1,784 sqm of floorspace (GIA), with a net sales area of 1,315 sqm;
- A designated Aldi car park offering 110 spaces, which include 8 blue badge spaces, 6 parent/child spaces and 17 staff spaces; and
- 8 cycle spaces (4 Sheffield hoops) and 4 electric charging spaces with an additional 22 passive electric car charging bays.

1.5. This application is submitted following pre-application discussions with officers at South Holland District Council.

1.6. The application is accompanied by a comprehensive suite of documents with subsequent sections in this Statement covering the following:

- Section 2 provides background to the application site, including a review of relevant planning history.
- Section 3 summarises the relevant planning policy.
- Section 4 sets out the application proposals and provides details of Aldi's specific retail offer.
- Section 5 details pre-application discussions with officers and a summary of Aldi's public consultation.
- Section 6 demonstrates compliance with the sequential approach.
- Section 7 considers the potential benefits and impacts of the proposed retail development when set against the criteria in paragraph 90 of the NPPF.
- Section 8 demonstrates how the development accords with the latest national and local planning policy framework, as well as all other material considerations.
- Section 9 summarises the significant benefits of the proposals, in accordance with the wider planning objectives.

1.7. This statement provides the appropriate and necessary evidence to demonstrate the proposal accords with relevant development plan policies and the NPPF, asserting the benefits of developing in a sustainable and accessible location with a viable and deliverable opportunity.

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2. Application Site and Surrounding Area

2.1. The site lies to the east of Holbeach District Centre, to the south of Fleet Street (B1515) which forms the main arterial route into the town from the A17 to the north and east of Holbeach. Holbeach is 8 miles east of Spalding, the sub-regional centre for the area.

2.2. The site extends to approximately 0.86 hectares and occupies brownfield land within the settlement boundaries of Holbeach. The most recent use of the site was a Council Depot (Sui Generis) which was vacated by the Council some years ago when they moved their main operation to a neighbouring town. The site now appears to be used for storage. A Boxing Academy (Class E(d)) was also on site and closed over 5 years ago. As such, it is no longer fulfilling the role of a community facility for the town. Some of the existing trees on site are protected under a Tree Preservation Order and will be retained and enhanced through the proposed development.

2.3. The site is visible from the District Centre and sits circa 160 metres from Holbeach District Centre (Edge of Centre) with established footpaths and cycle lanes lining Fleet Street promoting links with the centre, with a mix of commercial and residential properties lining the route. It also has good access to public transport, with bus stops in situ.

2.4. Holbeach District Centre includes a mix of leisure, commercial and retail uses, with the streetscape is made up of a combination of red-brick and rendered buildings with no dominant architectural style.

Image 2.1 – Application Site



Source: Planning Potential Site Visit (September 2022)

Planning History

2.5. We have identified the site's planning history includes planning permission being granted for the part change of use of SHDC works depot (sui generis) to boxing academy (D2) in 2010 (LPA Ref. H09-0937-09). Prior to this, an outline application for residential development was withdrawn in 2008 for reasons not disclosed on public access (LPA Ref. H09-1613-07).

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3. Planning Policy

3.1. Having set out the context in which the proposals have come forward and the application site within it's wider setting, this section sets out the relevant policies against which the proposed development should be assessed. Planning law requires applications for planning permission to be determined in accordance with the development plan, unless material considerations indicate otherwise as per Section 38(6) of the Planning and Compulsory Purchase Act 2004.

3.2. The NPPF is clear at paragraph 38 that:

*"**Local planning authorities should approach decisions on proposed development in a positive and creative way** [*emphasis added]. *They should use the full range of planning tools available…and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible."*

3.3. The South East Lincolnshire Local Plan 2011-2036 (SELLP) was adopted by Boston Borough Council and South Holland District Council on the 8 March 2019. The relevant policies within the South East Lincolnshire Local Plan 2011-2036 are:

- Policy 1 'Spatial Strategy' – seeks to concentrate development in the Districts main towns. Within the settlement boundaries of main service centres (such as Holbeach) development will be permitted that supports their role as a service centre for the settlement itself and helps sustain existing facilities or helps the meet the service needs of other communities.
- Policy 2 'Development Management' – requires proposals to demonstrate sustainable development considerations have been met through a number of criteria.
- Policy 3 'Design of New Development' – requires development to create distinctive places through the use of high quality and inclusive design, demonstrating compliance with a number of considerations.
- Policy 4 'Approach to Flood Risk' – developments must satisfy the sequential test and be supported by a site-specific flood risk assessment covering risk from all sources of flooding including the impacts of climate change. It must be demonstrated that surface water from the development can be managed and will not increase the risk of flooding to third parties.
- Policy 6 'Developer Contributions' - Non-residential development of 1,000sqm gross floorspace or more will be expected to mitigate their impacts upon infrastructure, services and the environment to ensure that such developments are acceptable in planning terms. Contributions will be secured through section 106 (legal) agreements.
- Policy 24 'The Retail Hierarchy' - Retail uses should be located in accordance with the retail hierarchy, with development in Holbeach District Centre acceptable where there will be no significant impact upon the vitality and viability of the centre. Out of centre retail uses are to demonstrate compliance with the sequential test and provide a robust assessment of impact on nearby town centres if greater than 250sqm (net) or more outside District and Local Centres.
- Policy 28 'The Natural Environment' – Requires the protection, enhancement and management of natural assets, by ensuring all development proposals provide an overall net gain in biodiversity.
- Policy 29 'The Historic Environment' - Distinctive elements of the South East Lincolnshire historic environment will be conserved and, where appropriate, enhanced.
- Policy 30 'Pollution' – Supports development which do not result in unacceptable adverse impacts, taking account of mitigation measures.
- Policy 31 'Climate Change and Renewable and Low Carbon Energy' - All development proposals will be required to demonstrate that the consequences of current climate change has been addressed, minimised and mitigated.
- Policy 32 'Community, Health and Wellbeing' - Development shall contribute to the creation of socially-cohesive and inclusive communities; reducing health inequalities; and improving the community's health and well-being.
- Policy 33 'Delivering a More Sustainable Transport Network' – reinforces the national approach to promoting sustainable alternatives to the car through new development, making the best use of, and seek improvements to, existing transport infrastructure and services. Solutions that are based on better promotion and management of the existing network and the

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provision of sustainable forms of travel are supported. To achieve this, a Transport Assessment and associated Travel Plan will be submitted with proposals.

- Policy 36 'Vehicle and Cycle Parking' - All new development, should provide vehicle and cycle parking, in accordance with the minimum Parking Standards adopted by the Local Planning Authorities.

National Planning Policy Framework (NPPF) (July 2021)

3.4. The NPPF and sets out the Government's planning policies and how these are expected to be applied.

3.5. Section 2 outlines the need to relate prospective development to the concept of sustainable development, which can be defined as "meeting the needs of the present without compromising the ability of future generations to meet their own needs". Paragraph 8 establishes three dimensions to sustainable development: economic, social, and environmental.

3.6. Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development, including approving development proposals that accord with an up-to-date development plan without delay.

3.7. Paragraph 38 states that "local planning authorities should approach decisions on proposed development in a positive and creative way" and encourages working proactively with applicants to secure developments that will improve the economic, social, and environmental conditions of the area.

3.8. Paragraph 39 identifies early engagement as having the potential to improve the efficiency and effectiveness of the planning application, securing improved outcomes for the community with the preceding paragraphs up to and including paragraph 46 explaining the benefits and purpose of pre-application and early engagement forms.

3.9. Section 6 refers to how LPAs should seek to build themselves strong and competitive economies, with paragraph 81 emphasising how policy and decisions should facilitate businesses' ability to invest, expand and adapt.

3.10. Section 7 of the NPPF ensures the vitality of town centres. Paragraphs 87 and 88 require local planning authorities to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. Paragraph 88 acknowledges the need for accessibility in new development, and the need for flexibility in the format and scale of development. Paragraph 90 requires an impact assessment for proposals over 2,500 sqm. Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 90, it should be refused (paragraph 91).

3.11. High quality design in the built environment is clearly stated throughout the NPPF with paragraph 124 stating good design is a key aspect of sustainable development.

Planning Practice Guidance (PPG)

3.12. The PPG outlines guidance relating to the application of the sequential test highlighting the need for assessments to be proportionate and appropriate to the given proposal and reiterating the need to demonstrate flexibility in the format and scale of the proposed development.

3.13. The PPG also provides advice as to the application of the impact test confirming it should be undertaken in a proportionate and locally appropriate way tested over a period of up to 5 years from application submission. The PPG also provides details on the general approach/methodology for the application of the impact test.

3.14. As a guiding principle, impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. food retail). Retail uses tend to compete with their most comparable competitive facilities.

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4. Proposed Development

4.1. The planning application seeks full permission for the demolition of existing buildings and the construction of an Aldi foodstore (Use Class E) alongside car parking, landscaping, and associated works. The proposed site layout is attached at **appendix 1**.

4.2. The proposals have been developed through the pre-application process with South Holland District Council, a public consultation exercise with residents and local stakeholders and input from specialist independent consultants. Where possible and appropriate, plans have evolved considering comments received from stakeholders and members of the public following the public consultation exercise. This includes the addition of security bollards on the entrance of the site to prevent anti-social behaviour outside of operating hours and additional accessible parking bays.

4.3. The table below shows the proposed floorspace breakdown:

Table 4.1: Proposed Floorspace

Aldi Foodstore	***Area (sqm)***
Sales Area	1,315
Gross Internal Area	1,784
Gross External Area	1,882

Source: Drawing H20A13 – P003

Access and Parking

4.4. The application site is located in a highly sustainable and accessible location on the fringe of the District Centre. Existing pedestrian routes are to be retained and enhanced where necessary to encourage links with the centre and bus stops along Fleet Street. A combined customer and servicing vehicle access/ egress is shown on the Site Layout drawings to facilitate safe and secure access to the site and minimise conflict on the site. The detailed Transport Assessment reviews the site's accessibility, network capacity and the proposed access, demonstrating adequate visibility and turning arrangements for the development.

4.5. To promote the sustainability of the store a separate pedestrian access point is also included in the northern corner of the site to promote linkages to Fleet Street and the District Centre to the west, along a clear desire line from the store's entrance. The access and foothpaths will be paved with dropped kerbs designed to encourage foot borne trips, taking advantage of the site's connectivity with the surrounding existing residential uses.

4.6. Once on site, an easy to navigate site layout with clear pedestrian and vehicular routes are provided across the entire development.

4.7. To support the development, various sections of designated car parking for each use are proposed. A total of 110 Aldi car parking spaces will be provided for staff and customers. This will include 8 blue badge spaces, 6 parent & toddler spaces, 17 staff spaces and 4 EVCP points. A further 22 passive EVCP spaces will be provided. Following consultation 2 further accessible parking bays have been added to meet local demand.

Site Layout and Design

4.8. The layout of the development has been carefully considered due to its surroundings and the physical characteristics and constraints of the site and commercial requirements for visibility from the main road. This has also been informed by detailed pre-application discussions with Council Officers and stakeholders prior to submission and is fully detailed in the Design and Access Statement.

4.9. Glazing on the food stores prominent northern elevation and around the store's entrance on the eastern elevation creates an attractive frontage and provides active surveillance across the car park and onto the surrounding road network. The use of glazing in the stores prominent fascia's allows light and offers views into and out of the foodstore across the car park and provides an expansive customer entrance and till and packing area. The layout of the store also meets Aldi's operational requirements which are detailed in **Appendix 2** ensuring that this development is deliverable and viable.

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4.10. Details regarding the height, design, materials, and massing of the foodstore are contained within the supporting Design and Access Statement. The key points to note are that the scale and massing of the Aldi foodstore is not out-of-character with surrounding uses. The Aldi store blade roof design keeps the height of the store to its minimum to the west of the site carefully considering the residential properties along Rathkenny Close, with the highest points closest to the customer car park.

4.11. The palette of materials & colour used is appropriate and does not compete or conflict with surrounding vernacular, which is characterised by a range of materials. The design and layout of the proposed development complies with the requirements of the Disability Discrimination Act and ensures it is fully accessible for all.

Landscaping

4.12. The site layout retains the majority of the existing trees around the site, including the TPOs along the eastern boundary. Trees to be removed are due to their existing poor condition and the enable the site's access. The scheme introduces additional planting along the remaining boundaries and within the car park to add visual interest, soften the development and break up expanses of hard surfacing. Low-level planting, shrubs and trees are introduced towards the site's borders to help define the boundary between the store and neighbouring developments. Overall, the scheme will make a positive contribution to the overall street scene and improve the biodiversity value of the site post-development.

4.13. A Landscaping Plan produced by Middlemarch accompanies this planning application and provides further detail on the proposed landscaping which includes a mix of hard and soft boundary treatments to tie the scheme in with the wider area.

Amenity

4.14. The opening hours for the proposed foodstore are:

- 08.00 – 22.00 Monday to Saturday (including Public Holidays) and 10.00 -16.00 on Sundays.

4.15. These hours reflect those permitted at numerous other Aldi stores nationwide.

4.16. Bearing in mind the surrounding residential properties, with the proposed 2.4 metre acoustic timber fencing proposed, the accompanying Noise Impact Assessment supports deliveries between:

- 06.00 – 23.00 Monday to Saturday (including Public Holidays) and 08.00 – 18.00 on Sundays

4.17. Unlike other supermarket brands, Aldi stores do not have a conventional service yard. Instead, they use a leveller dock delivery process where vehicles reverse up to the loading bay with the HGV rear opening contained within a surrounding 'curtain'. Goods are then wheeled on pallets directly off the lorry into the warehouse area, eliminating much of the noise generation from the process. Other mitigation bespoke to Aldi's delivery procedure include no reversing bleepers outside of store opening hours and lorry engines/ refrigeration units turned off when on-site.

Anti- Social Behaviour

4.18. The development will follow the emphasis of natural surveillance with overlooked car parking from the foodstore and road due to the low-level planting and general openness of the site. The store has been positioned to the rear of the site with secure fencing around the rear to improve security and reduce hiding places. The cycle hoops are overlooked by people around the entrance to the ALDI store due to the strategic location adjacent the glazed areas and car parking. The footpaths will be well lit during the dark morning and evening hours offering further security

4.19. On the back of a positive public consultation, Aldi have taken note of comments received and incorporate telescopic bollards that will prevent any access to the site after closing hours. This will prevent anti-social behaviour on site and protect the amenity of the neighbouring properties.

Employment

4.20. The proposals will create a significant number of jobs at construction stage and 30-40 full and part time jobs at the Aldi for local people once operational. Aldi are dedicated to providing employment opportunities, training and support. These initiatives can be secured by condition or as part of a S106 agreement.

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5. Pre-Application Discussions and Key Planning Issues

5.1. Pre-application discussions have been held with South Holland District Council.

5.2. Further public consultation was conducted with local stakeholders and residents in September 2022 and remains ongoing. A website has been published, a newsletter mail out has been sent to residents and an in-person consultation event held on 28th September 2022. The full pre-application consultation exercise is detailed in the submitted Statement of Community Involvement.

5.3. These discussions and expert advice from Aldi's team of independent consultants on site specific considerations including highways, flooding & drainage, ecology and design have informed the proposals presented.

5.4. The key planning issues highlighted by the policy review and confirmed during the pre-application discussions are:

- Principle of the retail development, the sequential approach and impact on the vitality and viability of Holbeach District Centre
- Amenity
- Retention of the TPOs on site
- Highway safety and any improvements required
- Addition of telescopic bollards at the site entrance, to prevent out of hour access; and
- Additional accessible parking bays to meet demand.

5.5. The principle of retail development is addressed in the following two sections of this Statement. Section 8 summarises technical reports relating to design, amenity, transport and accessibility and other planning considerations.

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6. Sequential Approach

6.1. In line with the requirements of national and local policy, a sequential assessment is required to demonstrate that no other suitable, more centrally located sites are available for the proposed development. Guidance on preparing sequential assessments contained within the NPPG[1] has been followed as well as considerations from relevant case law and Secretary of State decisions. These provide further clarification and guidance on the application of the sequential test in respect of availability, suitability, flexibility, and the requirements to consider disaggregation of developments.

Relevant Decisions and Case Law

6.2. In respect of availability, NPPF paragraph 87 asks whether sequentially preferable sites are 'available' or 'expected to become available within a reasonable period'. However, the NPPF or PPG do not qualify what is meant by these terms but suggests *"when considering what a reasonable period is for this purpose, the scale and complexity of the proposed scheme and of potentially suitable town or edge of centre sites should be taken into account".*

6.3. Relevant decisions on the matter of suitability and flexibility confirm it is primarily a matter of planning judgement which should be considered in the context of the circumstances relating to the development site and the development proposals. Considering 'suitability' and 'flexibility', numerous decisions have made it clear the term 'suitable' relates to the development/application proposed and not another form or scale of development which could be amended to fit onto a town centre or sequentially preferable site. The Mansfield decision [2] also considered the requirement to demonstrate flexibility with paragraph 35 of the judgement confirming *'"suitable" and "available" generally mean "suitable" and "available" for the broad type of development which is proposed in the application by approximate size, type, and range of goods. This incorporates the requirement for flexibility in [24] NPPF, and excludes, generally, the identity and personal or corporate attitudes of an individual retailer.'*

6.4. It is clear that national planning policy does not require 'disaggregation' to be addressed. Splitting the application into different sites is not part of a developer's business model providing a degree of flexibility has been demonstrated.

Methodology

6.5. The following methodology has been followed for this sequential test:

- Define the catchment area (Primary Catchment Area reflects Zone 7 of the Council's Retail Study covering Holbeach).
- Define the operator's requirement recognising the importance of flexibility.
- Identify vacant units/sites within the town centre and those identified through pre-application discussions.
- Assess those identified based on their suitability, availability, and viability.

6.6. The requirements of the proposed development are for a total site of circa 0.86 hectares capable of delivering a foodstore of 1,784 sqm GIA (1,315sqm net sales area) with dedicated car parking of 110 spaces.

6.7. In line with the need for flexibility, this sequential test will assess sites of +/- 10% of the proposal's site area and floorspace which are located within, or on the edge (within 300m of primary shopping frontage) of Holbeach District Centre.

6.8. Planning Potential undertook a detailed site visit in September 2022 to explore potential sites within Holbeach and the immediate surrounding area comprising the catchment area.

Sequential Test

6.9. This section considers the proposed development against the requirements of the sequential test as set out at NPPF paragraphs 87-89 and Policy 24 'The Retail Hierarchy' of the South East Lincolnshire Local Plan (2019).

[1] Paragraph 011: Reference ID: 2b-011-20190722

[2] High Court decision involving Aldergate Properties Ltd v Mansfield District Council and Regal Sherwood Oaks Ltd in relation to the development of a foodstore in Mansfield [2016] EWHC 1670 (Admin)

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6.10. As part of pre-application discussions with South Holland District Council the scope of the proposed Retail and Sequential Assessment was discussed. This confirmed the Council agreed there are limited sites for development within Holbeach Town Centre, thus it is not considered there are any sequential sites to be investigated.

Vacant District Centre sites

6.11. For completeness as part of Planning Potential's site visit to Holbeach District Centre in September 2022, sites and properties within or on the edge of the Centre were reviewed. However, again no opportunity sites or properties were identified corroborating the conclusions of the pre-application discussions held in Summer 2022.

6.12. There are several distinct local factors that hinder the development of a comparable retail development 'in centre', including the compact nature of the centre resulting from the existing pattern of development, road and infrastructure networks, conservation area status and listed buildings and the tightly drawn defined limits to the centre boundaries.

Image 6.1 – Vacant Units in Holbeach Town Centre



Source: Planning Potential Site Visit (September 2022)

6.13. As a result, no alternative sites capable of accommodating a comparable development have been identified and it is therefore concluded that there are no sequentially preferable sites available within the catchment area.

Conclusion

6.14. Following a review of locations within, or closer to the Holbeach District Centre within the defined catchment area. no suitable, available, or viable locations have been identified. As such, it is considered that there are no sequentially preferable sites to accommodate the proposed food store. Therefore, satisfying the sequential test set out at NPPF para 87 and Local Plan Policy 24.

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7. Retail Considerations

7.1. Within this section we consider the potential benefits and impacts of the proposed retail development when set against the criteria in paragraph 90 of the NPPF. The NPPF is clear in stating that planning decisions need to take local circumstances into account, so that local authorities respond to the opportunities for achieving sustainable development.

7.2. It states that when assessing impact, only when it is demonstrated that any adverse impacts 'significantly and demonstrably' outweigh the benefits (positive impacts), should development be refused (paragraph 90). The planning system is actively encouraged to assume a 'presumption in favour of sustainable development', rather than being an 'impediment to sustainable growth'.

7.3. The proposal falls below the 2,500sqm gross floorspace threshold for requiring an impact assessment as set out in national policy, however adopted Policy 24 'The Retail Hierarchy' requires out of centre retail developments over 250 sqm net to provide an impact assessment.

Addressing a Local Need

7.4. Aldi has a longstanding and publicised requirement for a store in Holbeach. To date, 325 consultation responses have been received to our pre-application consultation prior to submission with 97.2% (316) of people supporting the proposals. This level of support demonstrates a clear need for increased choice and competition in food shopping within Holbeach. These results can be seen in the Statement of Community Involvement prepared by BECG.

Aldi Stores Ltd. – A different Retail Offer

7.5. Prior to setting out the main retail points, it is necessary and important to reiterate the key characteristics of the proposals, as this in turn dictates how the relevant retail impact considerations are applied. Full details in respect of Aldi's business operation are also provided at **Appendix 2**.

7.6. Aldi's philosophy is simple, providing high quality products at discounted prices within a pleasant shopping environment. Discounted prices are achieved through bulk buying and economies of scale, specialising in the lines (range of goods) offered and maximising efficiency in operations.

7.7. Unlike larger supermarkets, Aldi is not a 'one stop shop', meaning customers who wish to, for example, buy branded products or specialist meat products, have to visit other shops and services to complete their shopping trip.

7.8. In this way, Aldi complements rather than competes with existing local traders. As well as having a limited number of product lines, Aldi do not have in-store kiosks (e.g. cigarettes) or specialist concessions, such as in-store butcher, fishmonger or pharmacy and therefore, unlike other supermarkets locally, do not act as a 'one-stop-shop'.

7.9. Comparison goods primarily comprise weekly specials and range considerably. Often these are seasonal, including skiwear, garden furniture, electrical, Christmas, plants etc. A further characteristic of such goods is they are sold on a limited number of items per store i.e. there is no overspill and they are sold on a 'when they're gone, they're gone' basis. This means that, notwithstanding the limited comparison sales area, Aldi does not trade as a specialist comparison destination, thus further offsetting potential impacts in this respect.

7.10. Therefore, from time to time, Aldi customers will also shop elsewhere. Consequently, the introduction of an Aldi within a local market catchment means customers will be shopping at a store in addition to, rather than instead of, other shops. The result and reality is that Aldi complements a catchment, particularly in respect of local shops and services.

7.11. Crucial to this is a tried and tested business model and indeed this is recognised by retail industry classifications, which identifies Aldi as a Limited Assortment Discounter (LAD), or 'Deep Discounter'.

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Assessment of Retail Impact

7.12. We note the currently published South-East Lincolnshire Town Centre and Retail Capacity Study (December 2013) prepared by Applied Planning on behalf of the Council is the current evidence base on the Council's website. However, a new Town Centre and Retail Capacity Study (April 2020) prepared by Reeves Retail Planning Consultancy and Williams Gallagher has been commissioned by the Council to inform future local planning decisions and shared with Planning Potential at the pre-application stage. This has informed this Retail Assessment.

Study and Catchment Area

7.13. The catchment of a new Aldi store in Holbeach has been defined by assessing the shopping patterns across the area and local geography. The store's catchment would primarily comprise Holbeach to offer choice and competition locally and reduce shopping journey lengths. As such we suggest the catchment of the proposed store will include Zone 7 (Holbeach) as defined in the Council's Retail Study, **Appendix 3**.

Health of Holbeach District Centre

7.14. Prior to assessing the retail impact of the proposed development, it is necessary to understand the performance of Holbeach District Centre, the principal centre within the identified Primary Catchment Area. Accordingly, **Appendix 4** provides a detailed Health Check of the centre which is informed on the forthcoming Southeast Lincolnshire Town Centre and Retail Capacity Study (April 2020) prepared by Reeves Retail Planning Consultancy and Williams Gallagher and Planning Potential's own visit to the town in September 2022.

7.15. As part of a detailed visit in September 2022, Planning Potential undertook a health check of Holbeach Town Centre to assess the current vitality and viability and identify any impact the proposals may have on the established centre.

7.16. The Survey conducted in September 2022 identified 10 vacant units (9.62%). This is below the national average of 13.83%, illustrating the national trend for increasing vacancies as a consequence of changing consumer behaviour. In Holbeach, the level of vacancies within the centre appears to have decreased since pre-pandemic levels with 10 vacant ground floor units identified in 2019 the Council's Retail and Town Centre.

7.17. The centre benefits from predominantly local and individual businesses, with some national operators integrated throughout the town centre. For instance, Boots, Nationwide, Tesco and Co-op are all situated within the town centre. There is a broad mix of hair and beauty, take-aways, gambling premises and other main town centre uses.

7.18. At the time of survey (Wednesday late-morning/early afternoon) the town centre was reasonably busy in the heart of the town centre and in and around Boston Road South, with pedestrian footfall focused along the High Street and Tesco. High Street encompasses the vast majority of the Primary Shopping Area/Primary Shopping Frontage. The heart of the Town Centre is designed for both pedestrians and car users. The high street has several traffic calming measures (crossing points) enabling those travelling on foot to direct themselves around the centre safely. There with no obvious signs of anti-social behaviour culminating in a safe feeling in the heart of Holbeach Town Centre.

Existing Convenience Shopping Patterns and Turnovers

7.19. The full retail impact assessment is included at **Appendix 5** of this Statement and is aligned with the new Town Centre and Retail Capacity Study (April 2020). As such the Primary Catchment Area will have total convenience expenditure of £19.98 million at 2030.

7.20. We note significant housing growth is planned around Holbeach over the Local Plan period. As such, this will generate additional convenience expenditure in the catchment area benefiting the Centre and retailers. Estimates based on the planned housing numbers in the Local Plan suggest there could be an additional £11.77million in expenditure by 2030 (**Appendix 5**, Table 4). Given the turnover of the Aldi will be circa £12.13 million, this mitigates much of the impacts that will occur.

7.21. The main convenience offer in Holbeach consists of the 'in centre' Tesco and Co-op. Other provision in the centre is limited to several independent retail services and comparison stores such as Card & More, Cross Bros Ltd and Chosen. The only other national retailer is 'Boots'. Other than this, there is a clear lack in choice and competition for residents of Holbeach. Out of Centre provision is also limited, with a public consultation event highlighting shopping trends leading to Spalding and Boston, should a food shop be required.

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7.22. The new Town Centre and Retail Capacity Study (April 2020), confirms the dominance of the Tesco Superstore at Boston Road in Holbeach District Centre which attracts 50.8% of convenience expenditure within the PCA of the proposed development. The next most popular destination is Sainsburys, Holland Market, Spalding (Town Centre) attracting 10.9%.

7.23. Leakage from the town is circa 45%, with destinations relatively dispersed, however existing discounter retailers in Spalding and Boston already attracting a 10.8% market share of convenience expenditure in the Zone. This is despite a round trip of approximately 45 minutes for Spalding and an hour for Boston.

Base and Design years

7.24. The base year for the assessment is 2022 (year of planning submission in October 2022) and the design year will be 2030 (5 years from the planned opening of the store in 2025). This is for consistency with the Council's retail study which has assumed impact years of 2020, 2025 and 2030.

Turnover of Proposed Development

7.25. The turnover of the proposed development is calculated from the net retail floorspace of the food store, and an average estimated sales density, adopted from Mintel Retail Rankings and converted to reflect actual Aldi floorspace figures. Based on a proposed net sales areas of 1,315 sqm the proposed Aldi will generate a convenience turnover at 2030 of circa £12.13 million (in 2018 prices). Full details are included at Table 5 of the Retail Assessment which outlines the proposed estimated turnover of the proposed Aldi store at 2022 and 2030.

Trade Diversion (impacts)

7.26. Now the turnover of the development is apportioned to stores/ centres using a trade draw methodology, based on an understanding of location/ proximity and the extent to which the proposal will compete with existing facilities. As a guiding principal impact is assessed on a like-for-like basis in respect of a particular sector (e.g. food retail) competing with their most comparable competitive facilities. Table 6 of the Retail Impact Assessment is attached at **Appendix** 5 and details the anticipated trade diversions and resulting impacts from the proposed development.

7.27. In addition to the redistribution of trade amongst the existing Aldi estate, and in the context of realistic trade diversion patterns, the proposed Aldi store will also compete on a 'like for like' basis with existing retailers in the catchment and beyond. Aside from Aldi's own estate, we consider that the proposed development will divert trade from identified stores included in Table 6.

7.28. For stores within the Catchment area, the additional expenditure generated from committed and planned housing developments in the area can be factored in and further reduces the perceived impacts following the development of the proposed foodstore as such (**Appendix 5**, Table 7).

- Tesco Superstore, Boston Road, Holbeach- 14.4%
- Co-op, Fleet Street, Holbeach- 7.4%
- Holbeach Town Centre (other stores)- 7.6%

7.29. The proposed foodstore will also generate some passer-by trade given the sites prominent location on a main arterial route in and out of the town and good linkages with the District Centre.

7.30. The anticipated diversions from stores outside of the catchment area not only facilitates the clawback of expenditure currently leaking outside the catchment, it reduces unsustainable shopping patterns and also alleviates undesirable impacts associated with over-trading at these stores.

Impact on Town Centres

7.31. When examining impact, the NPPF seeks to ensure the vitality and viability of town centres. An application should only be refused on impact grounds where there would be significant impact on the centre.

7.32. As demonstrated above, Holbeach is a healthy centre and provides a variety of uses for residents and visitors. It is an attractive centre, with the High Street being the main focal point of the town centre, creating an attractive and well orientated centre, despite not reflecting the UK average composition of units as discussed in **Appendix 4**. However, it should be noted that there is a clear lack in convenience offer in the District Centre, leaving local residents with very little choice and no healthy competition.

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7.33. Attached at **Appendix 5** is an impact assessment carried out in accordance with the Practice Guidance. The assessment is carried in line with the South East Lincolnshire Town Centre and Retail Capacity Study (April 2020) which establishes where people in the area currently undertake their main food and top-up shopping.

7.34. The largest trade draws based on a combination of 'like for like' and proximity principles is the in-centre Tesco and, Sainsburys, Holland Market, Spalding and other stores outside the PCA.

We have compared the survey turnover of the Tesco with it's benchmark. This is using the convenience sales area figure and the Mintel Retail Rankings benchmark turnovers. This suggests the benchmark turnover for a Tesco of circa 1,242 sqm net (food sales) (taken from planning permission H09-0641-11) would be **£12.24 million** (in 2030). As such the Council's Retail Study's turnover figure of **£27.63 million** confirms the store is trading significantly above benchmark and will continue to do so even considering trade draw to the proposed Aldi store. This is before factoring in local housing growth, shown below which mitigates the impacts of the Aldi development.

- Tesco Survey Turnover at 2030 (pre-housing uplift) – £27.63 million
- Tesco Survey Turnover at 2030 (post-housing uplift) – £33.60 million
- Tesco Benchmark Turnover at 2030- £12.24 million
- Tesco Turnover Post-Aldi at 2030 (pre-housing uplift)- £22.78 million
- Tesco Turnover Post-Aldi at 2030 (post-housing uplift)- £28.75 million

7.35. As such we would not consider the impacts to be significant nor to impact the town centre which is the key policy test. Other district centre locations primarily serve a 'top-up' shopping role, as illustrated by the Council's Retail Study and as such impacts will be far less.

7.36. Linked trips are a consideration when assessing impact, however, given that the store would prevent food shopping trips from leaving Holbeach, shoppers would be encouraged to stay in Holbeach for other shops and services.

7.37. When introducing a new store to a town, people do not tend to change their shopping pattens so those preferring to use the local butchers for example alongside a main food shop will continue to do so, impacts tend to be on larger similar stores. For example, someone that currently uses the town centre butcher is already presented with the choice to use a supermarket but chooses to use the local butcher. This is unlikely to change with the introduction of an Aldi store.

7.38. The offer of comparison goods changes on a weekly basis and is a smaller floor area (20%). On this basis, impact has not been assessed.

7.39. Overall in terms of the NPPF we do not consider that these proposals will impact the vitality and viability of any centre within the catchment area.

Impact on the existing Tesco

7.40. Given Tesco's dominance in the catchment area it is likely that they will would wish to maintain this position and object to this planning application as they have many other discounter applications in recent months. However, this would neither benefit the community who are keen to see this application come forward or assist sustainable shopping pattens.

Positive Retail Impacts

7.41. The Council's own retail surveys suggest the existing food shopping facilities within the catchment are well used, however it is limited given the dominance of Tesco in the town. The remaining expenditure is leaving the identified catchment area.

7.42. The additional convenience floorspace brought about through the introduction of an Aldi at this location will address the lack of choice and competition within the catchment and redistribute trade amongst the stores where the majority of the trade diversions are envisaged: the existing Aldi stores and other 'Big 4' retailers which fulfil a similar 'weekly shopping' role. The store will also claw back trade lost to neighbouring zones/ authority areas reducing journey distances. Given Aldi's location on a key route in and out of the town centre the claw backed trade has the propensity to increase footfall and linked trips to the benefit of the existing local traders.

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7.43. This is further supported by the health and characteristics of the centres as outlined at paragraphs above, alongside characteristics of the Aldi business model which highlight how an Aldi store tends to complement rather than compete with existing stores and centres, which is a good foundation of linked trips. Case Study evidence on this can be provided on request.

7.44. Finally, we note that linked trips can also be undertaken through public transport, car, or taxi. This fact is supported by an appeal for a new foodstore at Newport (Appeal Reference: APP/C3240/A/11/216/7505); dated August 2012. This is of particular importance, as those who may not be able to undertake a linked trip through walking can still undertake a linked trip through other means.

7.45. In addition to the retail benefits, there are other economic benefits including job creation, investment and the regeneration of a longstanding, vacant brownfield site discussed in the next chapter.

Effect on existing, committed, and planned investment

7.46. Planning Potential are not aware of any existing, committed, or planned investment within the catchment area which would be significantly adversely impacted by the proposals. The Council confirmed there were no committed food retail development during pre-application discussions.

Impact of Covid -19

7.47. The pandemic has impacted the high street over the past 24 months with shops forced to temporarily close and the increase of internet shopping. Experian have explored this issue in the most recent issue of their Retail Planning Brief (19). Non- food products were hit harder in terms of online shopping, whilst on-line food shopping did increase, as well as click and collect, this is expected to return to normal levels. For many food retailers, online and click and collect does not impact the 'bricks and mortar' business as these services are undertaken from the store itself.

7.48. The pandemic highlighted the essential service that supermarkets bring to the local community and the need to reduce the need to travel. This proposal brings a deliverable investment opportunity at a time of economic uncertainty.

Conclusion

7.49. The Retail Impact Assessment conducted illustrates that no significant adverse impacts are anticipated on existing, committed and planned public and private investment in centres within the catchment area of the proposal and therefore no harm on the vitality and viability of Holbeach District Centre is anticipated. Therefore, the development is entirely acceptable when tested against local and national policy.

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8. Planning Assessment

Principle of Development

8.1. The application site is in a highly accessible and sustainable location on an arterial route into Holbeach District Centre. It is surrounded by a mixture of uses including residential immediately bordering the site and retail and commercial uses in the wider area.

8.2. The site is without notation as identified in the adopted policies map therefore development of the site for retail uses does not represent a departure from the Development Plan. We have demonstrated in Sections 6 and 7, that there are no genuinely available sequential sites to accommodate the proposals nor will the development result in a significant adverse impact on the nearby centres.

8.3. The proposals comply with Local Plan policy 1 'Spatial Strategy' as development within the settlement boundaries of Main Service Cetnres such as Holbeach will be permitted where it supports their role as a service centre for the settlement itself, helps sustain existing facilities or helps meet the service needs of other local communities. The re-use of previously developed land is supported in the NPPF and under policy S2.

8.4. Holbeach Town Centre/ Primary Shopping Area lies to the west of the site, therefore the site occupies an edge of centre location in retail planning policy terms.

Highways and Accessibility

8.5. A Transport Assessment (TA) and Interim Travel Plan (ITP) has been submitted in respect of this application by Andrew Moseley Associates.

8.6. The application site will be accessed by all modes of transport, including deliveries, via a new priority controlled T-junction with B1515 Fleet Street. The access will be located slightly east of the existing access location and would see the provision of a formalised site access junction, providing a betterment over the existing site access arrangement. A detailed site layout plan is attached at **Appendix 1**. It is considered that the sustainable transport links are of good quality. The site is therefore considered to be in a sustainable location for access by non-car modes and in line with local and national planning policy.

8.7. The TA concludes that, the site can be appropriately accessed, there are no significant highway impacts and that the site is located in a sustainable location, with access to a variety of key facilities and services via sustainable modes of transport such as walking, cycling and public transport.

8.8. The ITP summarises the accessibility of the site and outlines a range of Travel Plan measures which will be promoted to employees to encourage sustainable travel patterns. Measures within the Travel Plan will focus primarily on staff travel because, as there is a good potential for a high level of staff trips to the store to be made using sustainable modes.

8.9. Therefore the development complies with policies 33 and 36 of the South East Lincolnshire Local Plan and the NPPF.

Amenity – Lighting

8.10. Paragraph 180(c) of the NPPF requires consideration of light pollution from developments, specifically that they are designed to limit light pollution from artificial light on local amenity, intrinsically dark landscapes, and nature conservation. Lighting on the site will be carefully controlled to ensure no light spillage to neighbouring properties. Lights in the car park will be turned off at night, with low level lighting remaining in the stores for security purposes. As such the development complies with policies 2, 3 and 30 of the Local Plan.

8.11. An External Lighting Plan and Report is submitted as part of the application for approval.

Amenity - Noise

8.12. Paragraph 180(a) of the NPPF seeks to ensure that developments does not conflict with or have any adverse impact upon neighbouring noise sensitive land uses.

8.13. Acoustic Design Technology Limited have undertaken an environmental noise survey to determine the currently prevailing noise levels in the vicinity of the surrounding noise sensitive areas. It includes an assessment of the fixed plant installations and noise from the servicing operations carried out to the latest British Standards. The layout of the building on site has aimed to minimise impacts on surrounding properties with acoustic fencing proposed around the servicing and plant areas. The residual impact after taking

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consideration of the site's context equates to 'no observed adverse effect' using the Planning Practice Guidance. As such the development complies with policies 2, 3 and 30 of the Local Plan.

Flooding & Drainage

8.14. A Flood Risk Assessment and Drainage Strategy have been prepared by Craddys to inform this planning application.

8.15. As the site is designated as being in Flood Zone 3, but not located in an area at risk of surface water, the site is considered to be located with Flood Zone 3a. As such, a Flood Risk Assessment is required.

8.16. The surface water drainage strategy for the site was developed in accordance with the hierarchy for surface water disposal and the South Holland District Council SUDS Guide and conclude surface water will be discharged via a public combined sewer running along Fleet Street to the north of the site. Foul water will be discharged via an existing foul sewer passing through the middle of the site.

8.17. The sequential flood risk test aims to steer development to sites with low flood risk. As the proposed site is classified as flood zone 3, the sequential test will need to be passed for development to be deemed appropriate.

8.18. Table 2: Flood Risk Vulnerability and Flood Zone "Compatibility" of the Planning Practice Guidance ('PPG') compares the vulnerability of the proposed land use of the development with the flood zone in which it will be located. The proposed land use of this development is classified by the PPG as "Less vulnerable". A "Less vulnerable" land use is considered "compatible" and "appropriate" in flood zone 3a, therefore the exception test is not required.

8.19. There are no sites identified within Holbeach District Centre that are considered available and/or suitable for the proposed development despite the Centre lying in flood zone 1 and 2. These site constraints cannot be overcome, therefore the development cannot be located at a lesser flood risk. Furthermore, the Flood Risk Assessment submitted in support of the application concludes that the proposal will not result in the increased risk of flooding elsewhere nor will it result in unacceptable levels of run-off.

8.20. In accordance with paragraphs 158 of the NPPF and Local Plan Policy 4, it is demonstrated that there are no reasonably available sites that are appropriate for the proposed development in areas with a lower probability of flooding and therefore the sequential test is satisfied.

Site Investigations

8.21. A Geo-Environmental Appraisal has been carried out by Groundtech Consulting, dated May 2022. Geo-environmental testing indicates no constraints to the proposed development on site informed by previous ground investigation repots conducted. Further investigation will be required in the footprint of the existing buildings on site to fully characterise the ground conditions and achieve appropriate site coverage.

Trees and Landscaping

8.22. An Arboricultural Assessment has been prepared by Middlemarch. This includes an Arboricultural Survey and Impact Assessment.

8.23. Trees on site are typically of low quality and were primarily situated adjacent around the boundaries of the site. However, there is a Tree Preservation Order on the group of trees along the north-eastern boundary which includes a English oak (T10- category B). There is one category A tree onsite, a mature English oak (T11) situated adjacent to the eastern site boundary, to the south of the TPO. In addition, a field maple (T14- category B) is located on the eastern boundary. The majority of trees on site were classed as category C or U.

8.24. Category A and B trees across the site have been retained with development located outside of the RPA or canopy spread where possible. Where development is proposed within the RPA or canopy spread, it is only car parking and can be constructed in such a way that damage of the tree root system or crown can be avoided. An Arboricultural Method Statement can be conditioned to set out what steps are to be taken to protect the trees during the course of development.

8.25. New planting will consist of a mix of ornamental, native and wildlife attracting species detailed on the attached Landscape Plan prepared by Middlemarch. A robust management plan can be conditioned and offer mitigation for any tree loss.

8.26. As such the development complies with Policy 3 and 28 of the Local Plan.

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Ecology and Biodiversity

8.27. An Ecological desk study and a walkover survey have been undertaken by Middlemarch Environmental Ltd which identified the features of ecological importance on site and provides a preliminary assessment of the potential impacts the proposed development could have on these features. In addition, Middlemarch have undertaken a Preliminary Bat Roost Assessment and Bat Activity Surveys at this site, the findings of which are submitted.

8.28. The Preliminary Roost Assessment identified one Building (B3) with high bat roost potential. To determine the bat species and roost status of Building B3 and presence/absence of roosting bats within Buildings B1 & B2, dusk emergence and dawn re-entry bat surveys have been undertaken on 12th and 28th September 2022 along with the proposed bat mitigation.

8.29. Bat Mitigation Guidelines recommend that for buildings with high bat roost potential, three surveys be undertaken including two within the peak season for bats. Therefore, the submitted report is an interim report based on surveys undertaken so far, and further survey work will be undertaken in Summer 2023 to confirm the September findings.

8.30. During pre-application discussions, SHDC confirmed the mitigation strategy could be subject to a pre-commencement condition to allow determination within the PPA time frame.

8.31. Therefore, the development complies with Policy 28 'The Natural Environment' of the Local Plan.

Sustainability

8.32. Another key objective of the NPPF is to support the transition to a low carbon future and all stakeholders are committed to achieving a truly sustainable development as part of their operations. An assessment of the sustainability of the site is included within the Design and Access Statement prepared by STOAS Architects and included within the application pack. This details the objectives for achieving sustainable development as part of their operations range between the day-to-day running of their retail stores, to designing sustainability initiatives within their new buildings.

8.33. As a business, Aldi operates an Environmental Management Policy, which has been endorsed by senior management. Aldi adopt the following sustainability measures to reduce energy consumption and increase the overall sustainability and efficiency of the store which have been developed in accordance with the sustainability themes detailed within the accompanying Design & Access Statement:

8.34. Lighting within the retail areas - The use of large windows to the front of the retail unit is a common design feature of Aldi stores. The inclusion of these windows helps to provide natural light to the sales floor. The use of natural light also reduces the energy demand required for lighting. Lighting in the supermarket consists of recessed and suspended LED light fittings incorporating the use of driver chips that are 100% efficient. Outside trading hours, lighting levels are maintained at one-third of the usual levels when stocking shelves. When the store is completely unoccupied, all lights (external and internal) would be switched off. In the event that lights are not turned off, a backup power saving system ensures that all lighting, including car-parking lighting is turned off 30 minutes after the store is locked.

8.35. Refrigeration Systems – The rolling out of modern CO2 pack and gas coolers in place of numerous HFC and condenser units means Aldi's chiller units and cold rooms run on a refrigerant gas with considerably lower environmental impact. The use of CO2 as a refrigerant has a greater benefit to the climate, with a GWP of 1 – traditional refrigerant has a GWP of 1,875. GWP, or 'Global Warming Potential' is a relative measure of how much heat a greenhouse gas traps in the atmosphere.

8.36. Heat Reclamation System - Since 2009, Aldi has installed a heat reclamation system which has proved to reduce the overall store energy usage by 23.6% and provide a reduction of the equivalent CO2 footprint of 10.28%. The concept is to use the heat removed from the refrigerated display cabinets combined with heat generated through the compression cycle and return this to the store via a refrigerant-to-air heat-exchanger located in the return air ducting, normally positioned in the warehouse. This, in standard form, provides up to 41kw of heat at normal operating conditions to pre-heat the return air prior to entering the air handler.

8.37. Aldi endeavour to operate in a sustainable manner as a commitment to being a 'greener' company. Examples include locally sourced goods; strict controls over packaging; external doors not left open/ efficient building techniques and; modern fleet of HGV's with improved aerodynamics, fuel-efficient tyres and tracking software to create the most efficient route plans. Stringent management regimes of the external areas ensure that litter is kept to a minimum, whilst coin operated trolleys minimise the potential for these to be taken off site and discarded.

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8.38. **Appendix 6** of this Statement details Aldi's UK latest sustainability initiatives for 2022.

Summary

8.39. The application site comprises a prominent development site, ready for development in a sustainable and accessible location won the fringe of Holbeach District Centre. Alongside the strong retail justification for the proposals, there are many additional benefits of the proposed retail development. An Aldi foodstore with all associated works will bring about increase choice competition in the market place, claw back trade and support wider investment in the town.

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9. Conclusion

9.1. This statement has been prepared on behalf of Aldi Stores Ltd. in support of a planning application for a modern Aldi foodstore development at Fleet Street, Holbeach.

9.2. The proposals represent a multi-million-pound investment at an unprecedented time for the UK economy, in particular for the retail sector. The application site is a significant regeneration opportunity of brownfield land in a highly accessible and sustainable location in Holbeach. The proposals will enhance the existing district centre offer, comprehensively redeveloping a brownfield site for economic development and generate wider benefits for the town through the creation of added footfall and linked trips with the District Centre. The proposals will enhance convenience choice and competition in the marketplace, delivering significant quantitative and qualitative improvements, enabling more sustainable shopping patterns. As such, it is considered that the proposal is in accordance with the provision of National Planning Policy Framework and relevant established Development Plan policies.

9.3. Benefits include:

- The proposed development represents a multi-million pound investment creating jobs during both the construction and operation stages, resulting in many associated economic benefits for the local area.
- The proposal will result in the redevelopment of a prominent development site for a sustainable and efficient use, leading to greater employment density.
- The proposed store will deliver choice and competition in local food shopping at an accessible location, leading to more sustainable shopping trips.
- There are no available or suitable sequentially preferable sites that could accommodate the proposed development and the store will not result in any significant adverse impact on town centre vitality or viability.
- The proposal will deliver a modern and highly sustainable food shopping facility, with new soft landscaping and tree planting which will positively impact the streetscene.

9.4. The benefits of the scheme are highlighted by the overwhelming support that the proposal have received as a result of the pre-application consultation undertaken on behalf of the applicant.

9.5. In this context, the NPPF advises that, only where proposals result in significant adverse impacts should planning permission be refused. In fact, this application represents a significant investment to secure considerable benefits to positively impact the town of Holbeach, and it is respectfully requested that planning permission is granted.

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Appendix 1: Site Layout Plan

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ALDI STORE
BLADE ROOF SLB
Retail 1315m²
(23.9 x 55m)
GIA 1784m²
FFL: 3.700

WAREHOUSE

HGV Turning Area and
17 No. Staff Parking

Future
Recycling
Unit

110No. Approx. Customer Car Parking Spaces
(Plus 17no. Staff Parking)

ALDI SITE
Approx. Area
8619 m²

FLEET STREET

DELIVERIES ONLY

Scale 1:200

LEGEND

- DENOTES OWNERSHIP BOUNDARY
- EXISTING TREE TO BE RETAINED
- PROPOSED TREE (SEE DRAWING MEL-535-001 FOR INFORMATION RELATING TO SIZE AND SPECIES OF TREE)
- ROOT PROTECTION ZONE
- CELLULAR CONFINEMENT SYSTEM
- 2.600 PROPOSED LEVELS
- 123 EXISTING LEVELS
- NEW LOW LEVEL LANDSCAPING - INDICATIVE ONLY
- FENCE - SEE DRAWING J21A89-STO_ZZ_XX_DR_A_0006_A2_P01 FOR FENCE TYPES
- T TARMAC
- B STAINLESS STEEL BOLLARD
- HDB HIGH DENSITY BOLLARD
- TB TELESCOPIC BOLLARD
- RK RAISED KERB
- FK FLUSH KERB
- TK TRANSITION KERB
- TRK TRIEF KERB
- TTK TRIEF TRANSITION KERB
- DELIVERY VEHICLE ROUTE IN
- DELIVERY VEHICLE ROUTE OUT
- PARKING BAYS ALLOCATED FOR FUTURE PROVISION OF EV CHARGING POINTS

STOAS Architects Ltd
PLANNING

Client: ALDI STORES LIMITED

Project Title: FLEET STREET, HOLBEACH

Project Address: FLEET STREET, HOLBEACH

Drawing Title: PROPOSED SITE PLAN

Job No.	Originator	Zone	Level	Type
J21A89	STO	ZZ	XX	DR

Role	Drawing No.	Suitability	Revision	North
A	0003	A2	P01	

Drawn	Checked	Date	Scale	Size
LJK	DCM	17.05.2022	1:200	A1

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Appendix 2: Aldi Business Model

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Aldi Stores Ltd – Business Model & Operator Regime

Who is Aldi?

Aldi is one of the world's leading grocery retailers. The company has built a network of stores in Europe, the USA and Australia. Aldi first entered the UK market in 1990 and has now expanded to over 800 stores across England, Scotland and Wales.

Aldi stores offer the customer a carefully selected range of high quality, exclusive own label groceries at heavily discounted prices. These prices are guaranteed across the entire range of products. The aim is for goods to be sold with discounts of between 20–30% for a full shopping trolley.

Aldi regularly receives industry awards recognising the quality of its products and customer experience. Aldi has recently been named as the UK's best supermarket by consumer champion, Which?, based on a survey of more than 3,000 shoppers across the UK. Aldi was the only supermarket to score five stars for value. Aldi was voted Supermarket of the Year at the 2016 Retail Industry Awards; the nation's Favourite Supermarket and Favourite Wine Retailer at the 2017 Good Housekeeping Food Awards; named Fresh Produce Supermarket of the Year at the FPC Fresh Awards 2017; and Britain's Favourite Supermarket in the Which 2018 Customer Satisfaction Survey. For recognition of investment in people, Aldi was crowned Employer of the Year at The Grocer Gold Awards 2017.

How Aldi is different

Aldi has a very different approach to food retailing than other food retailers based on simplicity and maximum efficiency at every stage of the business, from supplier to customer. This enables Aldi to sell high quality products, from a limited core range (compared to other supermarkets) of mainly exclusive own labels, at the lowest possible price consistently across the entire range. Aldi is a 'deep discount' retailer.

The main points of the trading philosophy include:

- Maximum operational efficiency and cost control;
- Standard merchandising through the stores;
- Bulk displays in original shipping cases;
- Efficient operation from supplier to customer;
- Unique delivery system;
- Efficient checkout system;
- Carefully selected and limited core range of 2,000 products;

- Own label high quality products;
- Formidable buying power;
- High volume and turnover per product;
- Heavily discounted prices providing an average 20-30% saving across the entire range, compared with similar quality products.

The consequence of providing this value retailing concept and service, of high quality food at heavily discounted prices, is that the design of the store and the sales area are uniform, in order to accommodate bulk food displays and provide the operational efficiency that a discount foodstore requires. These efficiencies are found across the entire operation from supplier to retail store and result in an enviable cost structure which allows Aldi to sell quality food at low prices, and operate on much smaller margins than other foodstores.

As stated, Aldi stores offer a carefully selected and limited core range of good quality exclusive own labels at heavily discounted prices. Predominantly, the limited range of goods relates to a reduced range of variations on the same product line compared to most other supermarkets. These are the most popular items: the ones most used and needed in every household.

By limiting the core range, Aldi suppliers typically only need to produce one package size instead of multiple packages within the same category. With the higher volume of one item, Aldi achieve greater purchasing power. The limited core range further allows Aldi to apply its own label to most of its products (c.90%) which do not include costs that the national brands pass on through higher prices. This allows Aldi to gain a significant cost advantage over competitors without compromising quality.

The deliberate intention is to restrict the range of core goods to approximately 2,000 products in the interests of the consumer and operational efficiencies and pass these savings onto the customer. The restricted core range ensures a high volume and turnover of each individual item, resulting in a favourable cash flow with products effectively sold through the checkouts before they have been purchased centrally.

This is unlike the larger supermarkets which stock in the region of 20,000 - 40,000 product lines, and more modest sized operators, with floor areas of 1,000 – 1,500sqm selling 2,500 – 4,000 products. Aldi do not sell cigarettes and tobacco products, stationary products and pharmaceutical products. The Aldi trading philosophy does not include a specialist butcher, fishmonger, in-store bakery, delicatessen or hot food counter which are commonplace in larger supermarkets. Aldi stores also do not accommodate in store cafes / restaurants or franchises such as photo processing, dry cleaning or opticians.

Whilst the core range of products is limited, Aldi offers a significant choice of locally sourced produce. Where possible Aldi's fresh meat and produce is UK sourced. Fresh fruit and vegetables are also sourced in the UK when in season and Aldi leads the way in supporting British farmers. In addition, Aldi works with a range of local businesses and suppliers in order to supply fresh bread, milk and other dairy products.

Aldi's stores dedicate approximately 20% of their floorspace to comparison goods. These goods are sold as 'special purchases' on a 'when it's gone, it's gone' basis. This approach is highly seasonal and there is a continued variation in the

type of goods that may be on offer. This is a key difference for Aldi when compared to larger supermarkets that typically have 30-40% of their floor area for comparison goods, the majority of which is occupied by permanent product ranges.

How Aldi differs is demonstrated clearly by the trading philosophy. Aldi complement, rather than compete with, existing local traders, independent retailers and other supermarkets, as well as service providers, as Aldi customers use other facilities to fulfil their grocery and local service needs. This generates a propensity for linked trips and associated spin-off trade which brings qualitative benefits.

Sustainable Development

Aldi supports sustainable development and has a strong track record in delivering schemes which contribute to the needs of the local economy.

Catchment

As Aldi stores are of modest scale and fulfil a neighbourhood shopping role, it means more than one store can be accommodated in a Local Authority area. The catchment for a new store is localised and often shoppers to a new Aldi store are existing Aldi customers who have been travelling to their nearest store, but with a new store opening close by, this can reduce the need to travel.

Aldi's local presence can assist in clawing back expenditure being spent elsewhere by providing a food store where perhaps such a facility was not available. This is most important in locations where shops and services are limited and access to stores elsewhere is difficult. A new store helps to retain expenditure within a given catchment area, to the benefit of the community.

Store operation and design

The uniform internal layout of an Aldi store reflects the company philosophy of offering value for money through cost effective management and efficiency. The shop fittings are specifically designed and constructed to display the goods as received in their packing cases so there isn't a double handling of goods from packing cases to the shelves. It means new stock can be moved from the warehouse area to the shop floor quickly and in large quantities.

The operation of the store is designed to be efficient and practical for use by customers; ensuring the store offers inclusive accessibility to all. The efficient layout with typically only 4 or 5 aisles means customers can move through the store quickly. There is ease of access to goods with all shelving being within easy reach. As the range of goods is limited customers can find what they are looking for quickly. With goods being pre-packaged, such as fruit and vegetables, customer can identify goods quickly and shop efficiently. Importantly, there are long conveyors at the check-out that hold a customer's full shop to allow goods to be unloaded for scanning and payment quickly. Goods are re-loaded back into the trolley at the check-out and packing is undertaken at the customer's leisure beyond the check-out area.

Aldi recognises that design is a key consideration in the determination of applications for its stores. The external design has evolved over time and now the design for each store is consistent across Aldi's portfolio, promoting modern, smart buildings with clean lines and glazed frontages which meet customer expectations.

Accessibility

The local nature of many of Aldi's stores encourages high levels of pedestrian shoppers and users of public transport. At new stores, cycle stands are provided, close to the store entrance for natural surveillance and mostly under the store canopy, to encourage cycling as a mode of transport.

Aldi requires new stores to have car parking adjacent to cater for customers who choose this mode of transport. Most car trips to new Aldi stores are not new to the network but rather transferred or linked trips.

Residential amenity

The opening hours of Aldi stores are more limited than some other larger supermarkets which operate 24-hour. Currently Aldi stores operate 0800 to 2200 Monday to Saturday and for six hours between 1000 to 1800 on Sundays, to comply with Sunday Trading Laws.

As Aldi stores are located in residential areas, Aldi is committed to being a responsible neighbour and seeks to ensure the amenity of residents is maintained.

Job creation and training

New Aldi stores generally employ up ~40 full and part time staff. It is Aldi's preference to recruit staff locally. The company's remuneration and training policy reflects Aldi's firm belief that a well-trained and highly motivated workforce is essential to the success of the business. All hourly paid wages for store employees exceed the Government's National Living Wage and the Living Wage Foundation's recommended national rate. Aldi offers full training for all its positions and the schedule and facets of the training are tailored to the individual.

Aldi has two of the most successful apprentice schemes and graduate programmes in the UK. Apprentices are trained to work in all parts of the business including at store, distribution, logistics and management level, as well as progression through to the Store Management Team.

Aldi's on-going graduate scheme secures an annual intake for the Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK-wide programme.

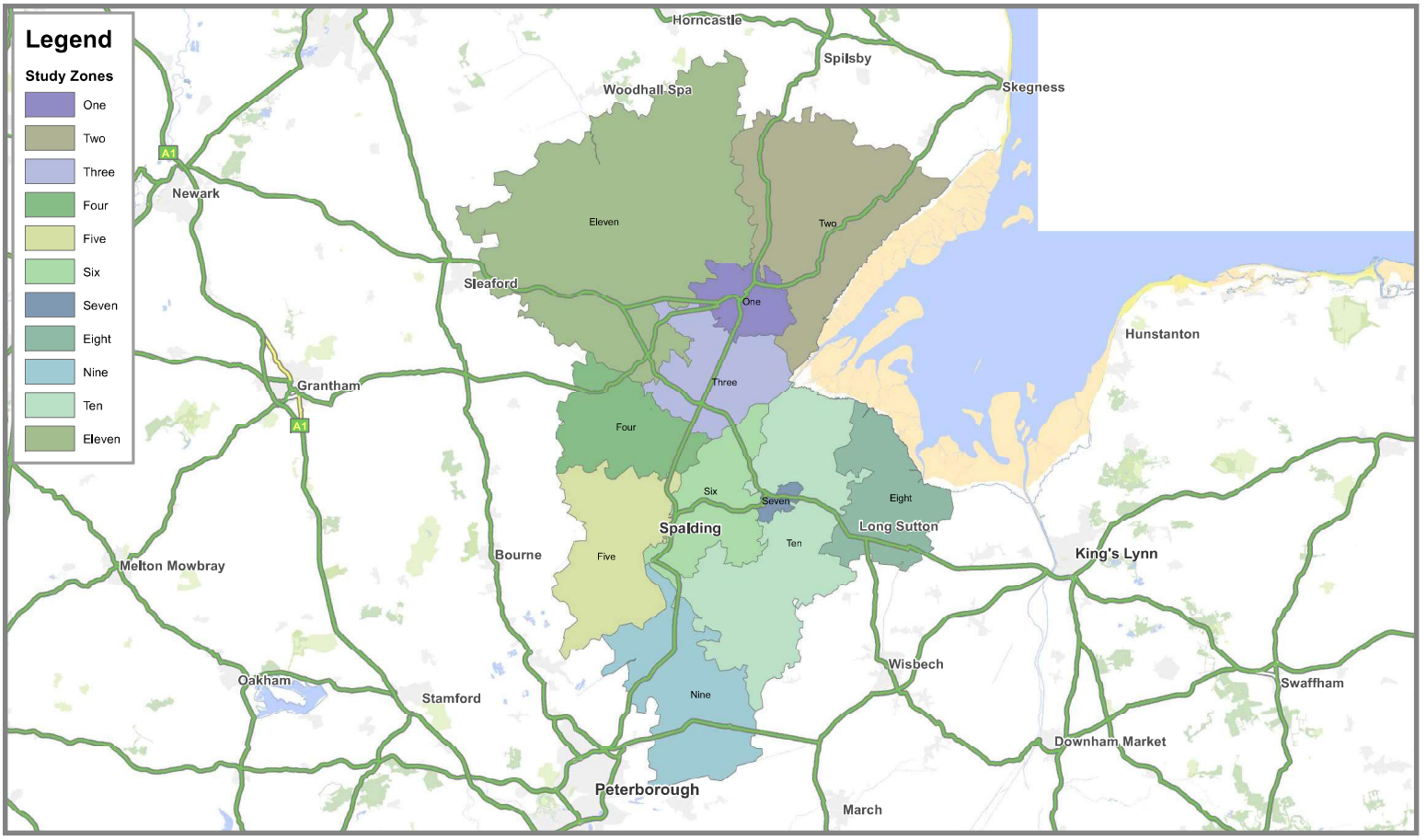
The construction of a new store requires the services of local building trade contractors which provides employment opportunities during the build out period. Usually a range of skills such as ground works, steel, brick and block work and shop fitting are sourced locally, as well as cleaners and labourers.

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Appendix 3: Catchment Plan

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South East Lincolnshire study area



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Appendix 4: Health Check

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Health Check- Town Centre

Introduction

Holbeach District Centre performs an important function by providing access to a wide range of retail and related services to serve the needs of the town and the immediate hinterland. Within the retail hierarchy set out in Policy 24 of the Southeast Lincolnshire Local Plan 2011-2036 (SELLP), Holbeach District Centre is the nearest centre to the proposed development site and primary destination within the Primary Catchment Area of the proposed development. Policy 26 promotes the improvement and expansion of Holbeach District Centre, as it is designated as being a Main Service Centre.

Planning Potential undertook a survey of Holbeach Town Centre on 28th September 2022. For the purposes of this assessment, the boundaries of Holbeach District Centre are based on The Southeast Lincolnshire Local Plan 2011-2036 (SELLP). These results have been compared to the health check findings outlined in the draft Southeast Lincolnshire Town Centre and Retail Capacity Study (April 2020).

One of the key objectives of performing health checks is to consider a centre's performance over time. This will have a bearing when considering the likely impact of new developments. Paragraph 006 (Reference ID: 2b-006-20190722) of the Town Centres PPG categorises a series of key indicators to be used when assessing the health of a centre over time. It is these indicators that we have based our health checks of the vitality and viability of centres on:

- Diversity of uses
- Proportion of vacant street level property
- Commercial yields on non-domestic property
- Customers' experience and behaviour
- Retailer representation and intentions to change representation
- Commercial rents
- Pedestrian flows
- Accessibility – this includes transport accessibility and accessibility for people with different impairments or health conditions, as well as older people with mobility requirements.
- Perception of safety and occurrence of crime
- State of town centre environmental quality
- Balance between independent and multiple stores
- Extent to which there is evidence of barriers to new businesses opening and existing businesses expanding
- Opening hours/availability/extent to which there is an evening and night-time economy offer

The Health Check outlined below ensures that the information presented on the vitality and viability of Holbeach Town Centre provides a full and robust assessment, in order to inform the assessment of retail impact and assist the Council in their decision making.

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Health Check Assessment

Centre	Holbeach District Centre
Images of the Centre	 
Diversity of Uses	A summary of the uses located within Holbeach Town Centre are set out below. Provision of these sectors within the Centre has been compared with the UK Average provided by Experian.
Retailer Representation and Intentions to Change Representation	The District Centre of Holbeach is principally focused around the pedestrianised areas of High Street, Boston Road South and Park Road. A summary of the uses located within Holbeach District Centre are set out within the diversity uses table above. The main sectors found in the centre are Retail Services (26%) Comparison (25%) and Leisure Services (24%). Leisure Services have increased since the 2019 retail study survey and the provision is now well above the UK. Similarly, this trend can also be seen with Retail services, whereby these uses are significantly above the UK average by almost 11%, with the health and beauty services particularly prevalent. It should be noted that the level of Convenience units within the centre has decreased, resulting in the number of uses to fall below the national average. Therefore, it is clear that Holbeach needs strengthening its convenience offer. The anchor

Sector	Planning Potential Health Check Assessment (22/09/2022)		*UK Average (2020)*
	No. of Units	*%*	%
Convenience (A1)	8	7.7	9.29
Comparison (A1)	26	25	26.95
Retail Service (A1)	27	26	15.74
Financial & Business Service (A2)	13	10.7	8.84
Leisure Services (A3/A4/A5/Sui Generis)	25	24	20.61
Miscellaneous/ Other	1	1	4.52
Vacant	10	9.6	13.83

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	national Convenience retailers include 'Tesco' and 'Co-op'. The centre is dominated by single fronted units and vacant units present are not big enough for a new supermarket such as Aldi. Overall, the centre has a diverse offer reflecting its overall size and status as a higher order centre, with a good presence of leisure services. However, there is a weak convenience offer, with national retailers' presence being few and far between. This is a result of the centre comprising predominantly of single fronted units.
Balance Between Independent and Multiple Stores	During the site visit it was noted that Holbeach District Centre was predominantly characterised by small independent operators, including local comparison and food & drink operators such as florists, card shops and cafes. National multiple store retailers include 'Tesco', and 'Co-Op', which anchor the town centre in terms of convenience offer. Other multiples include Boots and Nationwide.
Proportion of Vacant Street Level Property	The level of vacancies within the centre (9.6%) have decreased since the Covid-19 pandemic and are currently below the UK national average of 13.83%, with 10 units recorded in the Health Check assessment undertaken in September 2022.
Extent to which there is Evidence of Barriers to New Businesses Opening and Existing Businesses Expanding	As noted within the above sections, there are several vacant units, which were noted as being advertised as either to let or for sale throughout the centre. From this assessment there does not appear to be any evidence of significant barriers to new business opening and existing business expanding, particularly due to the observed variety of vacant units available. Policy 25 promotes opportunities to support and extend the offer of town centres as destinations through supporting redevelopment opportunities, public realm enhancements and town centre events to encourage further investment and attract further footfall.
Opening Hours / Availability / Extent to Which There is an Evening and Night-time Economy Offer	As recorded in Planning Potential's update, the District Centre contains a significant number of retail services and leisure services. Although Planning Potential's survey was conducted in the daytime (11:00-15:00), there appeared to be evidence of an evening economy offering in the centre, including a selection of public houses; restaurants and Leisure Services located in the Primary Shopping Area. Despite this, the number of units is limited, and the proportion of leisure services is higher than the national average.
Pedestrian Flows	A formal pedestrian flow count was not undertaken by Planning Potential, however the perception of pedestrian flow within the Centre was moderate. This may be due to the time of day (circa 1.00pm). Car parking is available both on-street along the High Street and Church Street and in the two public car parks provided at Boston Road and Fishpond Lane. There is also car parking provided at the Tesco and the Coop stores. The volume of traffic passing through the centre was considered moderate at the time of survey, but it did not appear to have an impact on the environmental quality of the centre, given the provision of pelican and zebra crossings. Any slow-moving or stationary traffic observed was due to these designated crossings being used by the pedestrians to move around the centre.
Accessibility	The District Centre is easily accessed from the surrounding area, served by the A17, close to its junction with the A151 whereby through traffic is limited. Holbeach District Centre is also the focus of the bus routes across the wider area. There are several bus services that run through the heart of the centre via High Street and Fleet Street. These bus routes to /from Holbeach operate on a number of routes including to King's Lynn and Spalding, with other routes provided on school days only. Additionally, there is a cycle lane present along fleet street that leads into the Town Centre. Road movements are restricted by the number of crossing points. The historic fabric of the town also places restrictions at a number of points. The centre also benefits from short stay car parking associated with Co-Op and Tesco, however, there are also a small amount of on-street parking available along the High Street. The pedestrian infrastructure aids free movement of those on feet, and there was no feeling of the centre being dominated by traffic. Pavements have been widened in places and are generally good along the High Street.

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	They are also wide and pleasant around the church but there are some 'pinch points' on Church Street and Boston Road where the pavements narrow. The street surfacing, street lighting and number of crossings all contribute to the high-quality and accessible appearance of the centre, particularly High Street, making it a desirable place for visitors.
Perception of Safety and Occurrence of Crime	The centre appeared to give an overall sense of safety. Throughout the centre there was consistent pedestrian footfall, supported by several units in the centre having active frontages. All this contributed to positive surveillance giving an impression of safety. Certain areas were, however, noted to have in-active frontages where natural surveillance was poor, which was due to vacant units or dead frontages. There was no indication of anti-social behaviour in the centre such as graffiti or littering further supporting that the centre gave an overall impression of safety.
State of Town Centre Environmental Quality	Street furniture and landscaping is well maintained. Shopfronts are largely also well-kept and add to the overall appeal of the centre. Most of the town centre has a consistent townscape character, due to forming part of a Conservation Area. The operating units are of a similar scale and pattern. The buildings are generally considered to be in a good state of repair.
Summary	Overall, the health check undertaken by Planning Potential demonstrates that the Holbeach District Centre performs relatively well, benefiting from independent retailers predominantly, with some national retailers also contributing. The existing convenience uses present is below the national average. The lack of national retailers present in the town centre is obvious, and leaves locals with very little choice. Positively, the District Centre is a highly accessible centre that benefiting from good transport links and several car parks. Additionally, pedestrian crossing facilities and wide walkways allow for easy pedestrian movement within the centre, helping to provide a safe environment for linked trips around Holbeach District Centre. The well-maintained centre also benefits from having a consistent townscape, with street furniture in place at different locations within the centre. These features add to the physical character of the area and contribute to a pleasant and functional environment for shoppers and are reflective of the Conservation Area.

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Appendix 5: Retail Impact Assessment

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Table 1: Population

	Projected Population		
	2020	2025	2030
Primary Catchment Area	8,623	8,807	8,972

Source:

1) Table A11.1 of the South East Lincolnshrie Town Centre and Retail Capacity Study (April 2020)

Table 2: Total Expenditure Per Head

	2020	2025	2030
Total Convenience per Person exc. SFT in PCA (£)	2,247	2,234	2,227

Source:

1) Table A11.2 of the South East Lincolnshrie Town Centre and Retail Capacity Study (April 2020)

2) 2018 prices

Table 3: Total Convenience Goods Expenditure (£m)

	2020	2025	2030
Primary Catchment Area (£m)	£19.38	£19.67	£19.98

Source:

1) Table A11.3 of the South East Lincolnshrie Town Centre and Retail Capacity Study (April 2020)

Table 4: Committed and Planned Housing Growth

Committed and Planned new housing (1)	2,202
Estimated Population Growth	5,285
Total additional convenince expenditure (£m) (2)	£11.77

Source:

1) Policy 11: Distributiuon of New Housing, South East Lincolnshire Local Plan

2) Based on the estimated population growth multiplied by 2030 expenditrure per head shown in Table 3.

Table 5: Estimated Turnover of Proposed Development

		Floorspace (sqm)	2020 Sales Density (£ per sqm)	2020 Turnover (£m)	2020 Turnover (£m) (in 2018 prices)	2022 Turnover (£m)	2025 Turnover (£m)	2030 Turnover (£m)
Aldi, Fleet Street, Holbeach	Convenience	1,052	£11,734	12.34	11.97	11.56	12.08	12.13
	Comparsion	263	£10,157	2.67	2.66	2.46	2.76	3.09
	Total	1,315						

(1) Convenience to comparison spilt is 80/20

(2) Aldi turnover figure taken from Mintel Retail Ranking 2020 and converted to reflect actual Aldi floorspace figures

(3) Growth figure applied from Experian Retail Planner Briefing Note 19 Figure 4a and 4b

(4) 2018 Price Base

Table 6: Impact Assessment Convenience Goods (2030) without Housing Growth

Destination	Combined Turnover (£m) (1)	Diversion to Aldi, Holbeach (%) (2)	Diversion to Aldi, Holbeach (£m)	Post Impact Turnover in 2030 (£m)	Percentage Impact in 2030 (%)
Primary Area Catchment: Holbeach District Centre					
Tesco Superstore, Boston Road, Holbeach	27.63	40.0%	£4.85	£22.78	17.6%
Co-op, Fleet Street, Holbeach	1.30	1.0%	£0.12	£1.18	9.3%
Holbeach Town Centre (other stores)	0.63	0.5%	£0.06	£0.57	9.6%
Out of Catchment Area					
Aldi, Queen Street, Boston (Edge of Centre)	31.20	1.0%	£0.12	£31.08	0.4%
Sainsburys Superstore, Holland Market, Spalding (Town Centre)	41.71	10.0%	£1.21	£40.50	2.9%
Aldi, St Thomas's Road, Spalding (Town Centre)	26.70	5.0%	£0.61	£26.09	2.3%
Lidl, Winsover Road, Spalding (Town Centre)	9.29	2.5%	£0.30	£8.99	3.3%
Other Stores outside the PCA		40.0%	£4.85		
Source:		100.0%	12.13		

1) Tables A11.8 and 9D of the South East Lincolnshrie Town Centre and Retail Capacity Study (April 2020)
2) Aldi trade diversion figures based on Planning Potentials professional judgement

Table 7: Impact Assessment Convenience Goods (2030) with Housing Growth

Destination	Combined Turnover with Housing Growth (£m)	Diversion to Aldi, Holbeach (%)	Diversion to Aldi, Holbeach (£m)	Post Impact Turnover in 2030 (£m)	Percentage Impact in 2030 (%)
Primary Area Catchment: Holbeach District Centre					
Tesco Superstore, Boston Road, Holbeach	£33.60	40.0%	£4.85	£28.75	14.4%
Co-op, Fleet Street, Holbeach	£1.64	1.0%	£0.12	£1.52	7.4%
Holbeach Town Centre (other stores)	£0.79	0.5%	£0.06	£0.73	7.6%
Out of Catchment Area					
Aldi, Queen Street, Boston (Edge of Centre)	£31.29	1.0%	£0.12	£31.17	0.4%
Sainsburys Superstore, Holland Market, Spalding (Town Centre)	£42.99	10.0%	£1.21	£41.78	2.8%
Aldi, St Thomas's Road, Spalding (Town Centre)	£27.09	5.0%	£0.61	£26.48	2.2%
Lidl, Winsover Road, Spalding (Town Centre)	£12.46	2.5%	£0.30	£12.16	2.4%
Other Stores outside the PCA		40.0%	£4.85		
Source:		100.0%	12.13		

1) Tables A11.8 and 9D of the South East Lincolnshrie Town Centre and Retail Capacity Study (April 2020)
2) Housing Growth uplift based on Policy 11: Distributiuon of New Housing, South East Lincolnshire Local Plan
3) Aldi trade diversion figures based on Planning Potentials professional judgement

Appendix 6: Aldi Sustainability Statement

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2022 ALDI UK SUSTAINABILITY SUMMARY

SUSTAINABILITY AT ALDI

Aldi UK is committed to reducing our environmental impact, in line with our international CR strategy of *'Making sustainability affordable to our customers'.*

We believe that collaboration is key to achieving sustainable development, and the greatest change can only happen by working with all relevant parties. We engage with our stakeholders to achieve common goals and seek to build greater awareness of current and future challenges within our supply chains and throughout our company.

For more information on our Roadmap to Vision 2030, please click here.

Aldi UK are committed to achieving the international vision and are collaborating across departments to ensure an aligned and effective strategy through our national approach to be '*Better Everyday through Greener, Healthier and Fairer*'.

Examples of our *Better Everyday* initiatives are below:

Sustainability

- We aim to achieve net zero carbon emissions by 2030 for Scope 2 and 2035 for Scope 1 emissions.
- While we strive towards these targets, we have been investing in carbon offsetting for our direct operational emissions, making Aldi UK & Ireland a carbon neutral business since January 2019.
- Since 2015, we have been certified to ISO 50001, an internationally-recognised best practice standard for energy management to help us continually improve our energy efficiency.
- 100% of the electricity used to power our operations has come from green, renewable sources since 2015.
- There are over 400 stores in the UK with solar panels, as well as all 11 Regional Distribution Centres (RDCs), providing on-site renewable energy.
- Aldi UK is continually investigating further opportunities for energy and water savings using intelligent data monitoring and targeting.
- External energy and carbon performance reporting is conducted annually via SECR and Company Carbon Footprint reports.

Waste & Communities

- In 2021, Aldi raised £1,070,315 for Teenage Cancer Trust, bringing the total raised to £7 million since the start of the partnership in 2017.
- We donated 10 million meals in 2021 to those in need in our local communities through our partnership with Neighbourly.
- Through this partnership, we helped to support over 2,420 individual charities and good causes over 2021, diverting over 4,000 tonnes of food from being wasted in stores.
- We've also introduced new policies to reduce the price of products which are close to their use by or best before date, or have damaged packaging, to further reduce food waste in our own operations.

Corporate Responsibility

- Our goal is to achieve net zero carbon emissions by 2040 for Scope 3, covering all related supply chain and customer emissions.
- Alongside this, we are working to develop and deliver a Sustainable Food Plan.
- All of our fresh, primary range of meat, eggs and milk are 100% British and guarantee minimum standards of animal welfare and environmental impact through Red Tractor or QMS certification.
- 100% of our Specially Selected fresh salmon is RSPCA Assured.
- We implement animal welfare and environmental initiatives in our dairy supply chain through our Dairy Farm Partnership with our largest dairy supplier, Arla.

- All of our timber and paper products are sustainably sourced (FSC, PEFC or recycled), as well as all the palm oil in our products, which is RSPO certified. By 2025, all of the soy fed to animals in our supply chain, as well as in our products, will also be sustainably sourced and deforestation-free.
- All of our household cleaners, cosmetics and toiletries are Leaping Bunny certified, meaning they are cruelty-free and have not been tested on animals.
- We have a target to ensure 70% of our food and drink sales will come from healthier items by 2025, and we use our sponsorship of Team GB and Paralympics GB to promote healthy eating among our customers and through our 'Get Set to Eat Fresh' campaign.
- We are working with our suppliers to increase the number of certified sustainable products we sell.

Plastics and Packaging

- We have set ambitious plastics and packaging pledges:
    - 100% of own-label packaging to be reusable, recyclable or compostable by 2022 (2025 for branded products).
    - Reduce plastic packaging by 50% by 2025.
    - Reduce all packaging by 50% by 2025.
    - Plastic packaging to contain 50% recycled content by 2025.
    - Increase the volume of loose, refillable or reusable transactions year on year.

Property

- Aldi UK is investing in making our new and refurbished stores greener and more energy efficient by upgrading to CO2 refrigerants, LED lighting and installing chiller doors. The chillers doors are helping reduce our energy use by up to 20%, as well as helping to keep our products cool and our stores warm.
- Our National Property team are working to improve maintenance procedures to prolong asset life and increase remote monitoring of store Building Management System (BMS) data.

Logistics

- We have invested in improving the efficiency of our logistics operations by using fuel-efficient tyres, improved aerodynamics and double-deck trailers where possible.
- In 2021, we began transitioning our company car fleet to electric vehicles.
- We have also committed to moving our delivery vehicles from diesel to low carbon fuels such as CNG and HVO to support our journey to net zero.
- It is also our ambition to replace diesel-powered refrigeration units with electric power sources (i.e. electric trailer/solar).

People

- Aldi has implemented a number of flexible working practices and policies, including a remote working policy to improve work/life balance for colleagues who are able to work from home.
- All employees received a pay rise in February 2022, with Covid-19 bonuses being paid during 2020. The new rates exceed the Living Wage Foundation's recommended real living wage rates, and Aldi remains the only supermarket to offer paid breaks - which for the average store colleague is worth £750 annually.
- Aldi has launched a Diversity and Inclusion Strategy. This includes the following elements:
    - We are a signatory of the Business in the Community Race at Work Charter and are taking proactive steps towards each of its five commitments to improve diversity at all levels.
    - In 2021, we began a series of colleague listening groups, alongside our annual engagement survey, to provide a platform for people to share their different experiences and to promote better awareness of our approach to diversity and inclusion.
    - We are working with specialist agencies to increase applications from under-represented groups.
    - All colleagues at Executive Manager level and above will take part in training that promotes a better understanding of diversity and inclusion throughout 2022, to equip them with the tools and language to have positive conversations about inclusion.
    - Our internal communications channels and e-learning platform are being used to promote diversity, awareness and understanding.
- Aldi is also supporting colleague mental wellness through investing in developing resources, maximising strategic partnerships with wellbeing experts and delivering ongoing training.