

Planning Department
South Holland District Council
Priory Road,
Spalding,
Lincolnshire,
PE11 2XE

19 August 2016

Our Ref: 3144

Dear Sir/ Madam,

ALDI STORES LIMITED: FULL APPLICATION FOR THE DEMOLITION OF THREE RETAIL UNITS AND CONSTRUCTION OF EXTENSION TO EXISTING ALDI STORE, ALONGSIDE AN UPLIFT IN CAR PARKING AND STORE IMPROVEMENTS AT ST THOMAS ROAD, SPALDING, PE11 2XY

On behalf of our client Aldi Stores Limited, please find enclosed a full planning application for the above development at St Thomas Road, Spalding.

The application has been submitted via Planning Portal, under reference PP-05286539. The application fee of £1,540.00 has been paid via cheque, with the following information submitted electronically:

- Application Forms and Certificates;
- Covering Letter prepared by Planning Potential;
- Site Location Plan - C15A85-P001;
- Existing Site Plan – Drawing Ref: C15A85-P002;
- Proposed Site Plan – Drawing Ref: C15A85-P003A;
- Existing Floor Plan – Drawing Ref: C15A85-P004;
- Proposed Floor Plan – Drawing Ref: C15A85-P005;
- Existing Elevations – Drawing Ref: C15A85-P006;
- Proposed Elevations – Drawing Ref: C15A85-P007;
- Existing Roof Plan – Drawing Ref: C15A85-P008;
- Proposed Roof Plan – Drawing Ref: C15A85-P009;
- Bin Cage – Drawing Ref: AD5906;
- Heavy Duty Trolley Bay Shelter Photograph;
- Flood Risk Assessment prepared by Ambiantal;

Directors
Helen Cuthbert | Stuart Slatter | Claire Temple
Associate Directors
Alastair Close | Katie Turvey

Consultants
Caroline Dawson | Dan Templeton
Associates
Rob Scadding | Heather Vickers | Alan Williams | David Williams

- Design and Access Statement prepared by STOAS Architects;
- Transport Statement prepared by Exigo Project Solutions.

Justification Statement

The Aldi store at St Thomas Road opened over twenty years ago, and acts as a popular main food shopping facility for the residents of Spalding.

The retailer has become a household name, with a number of shoppers who originally did a main food shop at the Big 4, altering their shopping patterns to undertake a main food shop at Aldi. An increase in popularity over recent years, has resulted in the retailer making a number of changes to their business model, in order to meet consumer demand. This includes the modernisation of their existing estate, in respect of built footprint, car parking and reconfiguration of internal store layout for example. Improvements have been considered essential to ensure Aldi stores can operate efficiently.

Planning Proposal

This existing Aldi foodstore at Spalding has a GEA of 1,136sqm and net floorspace of 760sqm. The store is in need of modernisation, with Aldi looking at a number of store improvements to meet customer demand; outlined below.

Firstly, it is important to note that to accommodate the proposed development, three retail units to the west of the store are to be demolished. The buildings are not located within a conservation area, and are not nationally listed.

Proposed Improvements

- An increase in floorspace in line with table 1 below:

	<u>GEA</u>	<u>GIA</u>	<u>Net</u>
Existing Aldi Store	1204sqm	1136sqm	760sqm
Existing Retail Units	238sqm	212sqm	191sqm*
Proposed Aldi Store	1472sqm	1406sqm	1022sqm
Total	+30sqm	+58sqm	+71sqm

*Based on 90% GIA to Net Ratio

- Uplift in car parking numbers by 10 spaces, alongside the reconfiguration of the car parking layout.
- New public realm area at the entrance to the site from Winsover Road, which leads into the district centre.
- Design improvements, including a new glass canopy at the entrance of the store, alongside a new ribbon window and glazed lobby (external); external trolley shelter; external brick panels to be rendered on the southern and western elevation; relocation of cycle hoops; new retaining wall; bin store area to the southern elevation; new fire escape door within the welfare area of the store; and new windows to allow natural light to enter into the welfare area.

In respect of design, the development proposal has been informed by the layout of the exiting Aldi store, whilst taking into consideration the retailer's operational needs, in particular servicing arrangements. Consequently, the proposed extension is located on the western elevation of the building. The existing servicing arrangement will not be affected.

In respect of scale (height), the proposed extension will be in line with the approved Aldi foodstore, with the existing eave and ridge levels unaffected. Thus the overall height of the building will remain the same.

In respect of materials and overall design, the extension will retain the aesthetic value of the Aldi store, but also seeks a number of design improvements, outlined above, to ensure the store remains attractive to customers. Design changes are outlined on Drawing Number C15A85-P007 'Proposed Elevations' and C15A85-P009 'Proposed Roof Plan'.

In addition to the above, the proposal also seeks permission for the reconfiguration of the car park to enable an uplift of ten spaces. It is important to note that the amount of car parking on site will remain in line with South Holland Council's car parking standards and seeks to improvement the operation of the site which is a benefit. Further details are outlined in the accompanying Transport Statement.

The proposal therefore complies with the NPPF and Policy SG20 of the adopted Local Plan (2006).

The Retail Planning Case

The Aldi store technically occupies an edge-of-centre retail position, located approximately 205m from the primary shopping frontage of Spalding District Centre, but adjoining its town centre boundary. Given the sites existing use, the principle of development is considered acceptable.

Planning Potential notes that the store functions as part of Spalding district centre, with the emerging local plan including the store within its town centre boundary. On this point, the Council's most recent retail study dated 2013¹ recognises the role of Aldi in supporting the vitality and viability of Spalding.

Despite the above, an assessment against key NPPF, and local planning policy tests has been provided below, given the sites 'edge-of-centre' location.

Sequential Approach

With regards to the sequential approach, Policy EC15 of PPS4 required a more rigorous sequential test than that contained in the NPPF. For example, it is not part of the Framework's sequential test for applicants to demonstrate that a proposal has scope for disaggregation.

In light of the above, a sequential assessment is not required, given the modest uplift in floorspace which seeks to improve the efficiency of the Aldi store only. This position is supported by a recent SoS decision at Rushden Lakes (APP/G2815/V/12/2190175; **Appendix 1**), which makes plain that disaggregation can no longer be considered as part of the Sequential Test; and that Local Planning Authorities must consider the scheme as proposed.

The proposal therefore passes Paragraph 22 of the NPPF and adopted policy EC7 of the 2006 Local Plan.

Retail Impact

¹ South East Lincolnshire Town Centre and Retail Capacity Study, December 2013

Policy EC7 of the adopted 2006 Local Plan, sets a local threshold of 200sqm for a retail impact assessment for proposals outside a defined retail centre. Despite the store occupying an edge-of-centre location, it is evident that the store functions as part of the district centre, and supports its vitality and viability. In addition to this, the proposal represents a modest uplift in retail floorspace, which falls below the 200sqm threshold. It is our view that a RIA is therefore not required. However, to assist in the determination of this application, Planning Potential note that the existing Aldi store is over-trading² and this proposal will alleviate this over-trading. As such the proposal will not draw trade from any other retailer, but draw trade from existing customers who visit the store.

In support of the above, the extension will improve the internal layout of the store, and enable a larger range of existing goods to be available to customers. The proposal will not increase the range of lines within the store. Consequently, the proposal will not impact on the vitality and viability on Spalding district centre.

Other Considerations

Flood Risk

Planning Potential note that the site is located within Flood Zone 3. A Flood Risk Assessment therefore accompanies this application. However, a sequential flood risk assessment has not been provided, as the floorspace as noted above cannot be disaggregated from the main Aldi store. This position has been supported by case law.

The Flood Risk Assessment states that the proposed development can be classified as a minor development in flood risk terms. The Sequential Test: Flood Risk Vulnerability and Flood Zone 'Compatibility' Table as specified by the NPPF demonstrates that the development is appropriate and should be permitted. Analysis within the Flood Risk Assessment shows that flood waters up to the 1:1000 year with 20% climate change allowance would likely remain in channel in this area.

It is recommended that the site owner signs up to the EA Flood Warning Service to provide a betterment to the site.

The proposed development is considered to be acceptable in flood risk terms.

Transport Statement

The accompanying Transport Statement prepared by Exigo Project Solutions concludes that:

- The existing Aldi store car park is currently oversubscribed and congested at peak times during the day.
- The existing traffic surveys have demonstrated that the car park was observed to be at practical capacity for 2 hours on a Friday and 1 hour on a Saturday. Although this is considered as material, the increase in parking would be beneficial for the existing operation of the Aldi Store.
- The proposed increase in the size of the car park will significantly reduce congestion in the car park, with the maximum capacity likely to be approximately 83%. This would result in less congestion issues within the car park, improved site safety, and potentially less wasted trips to the store.
- An increase in sales floor area totalling 262 m² would not increase trip generation at the existing Aldi Store. The increase in store size would serve to improve the Aldi experience for existing customers, allowing the store to stock more products on shelves.

² Turnover of £10.9m in year 2013, as identified in 2013 Retail Study. This figure is above benchmark for a store of this size.

- Overall the proposals are considered to represent an improvement, and it is considered that there are no highways or transportation reasons why this development should not be improved.

Summary

I trust the above and attached are clear in setting out justification for the proposal, and look forward to receiving confirmation of validation in due course. In the meantime, please do not hesitate to contact me or my colleague Rachel Ford directly should you have any questions in respect of this matter.

Yours sincerely,

A handwritten signature in purple ink, appearing to read 'DZ', followed by a horizontal line and a small dot.

Dan Elvin MRTPI

Senior Planner

Harrogate

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