



EM/KG/NE2953

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Carlisle City Council
Investment and Policy
Civic Centre
Carlisle
Cumbria
CA3 8QG

Dear Sir/Madam

**PROPOSED SUBMISSION DRAFT CONSULTATION
CARLISLE DISTRICT LOCAL PLAN 2015-2030**

We object to proposed policy EC6 – retail and Main Town Centre Uses Outside Defined Centres

This representation is made on behalf of Aldi Stores Limited. Aldi Currently have two stores in the Carlisle District, London Road and Kingstown Road. In addition to these stores Aldi has started work on a new store at Dalston Road and is reviewing options to upgrade its existing stores.

Background to Aldi Stores Limited

Aldi entered the UK food retail market in 1990 and over the past 23 years has opened more than 480 ‘discount food stores’ which serve communities throughout Great Britain. Aldi currently employs more than 12,000 people across its food stores, distribution centres and administrative support facilities of the Company, and provide indirect employment opportunities to several thousand others as part of the wider supply chain.

Aldi is committed to continuing strong investment in the UK economy and is currently undertaking a nationwide floorspace expansion programme which aims to deliver a further 500 new discount food stores over the next 10 – 15 years and will recruit an additional 3,000 staff. Up to 30 members of staff are employed in each new store, with store extensions also increasing employment, and Aldi’s preference is to recruit locally. One of the areas that Aldi is currently looking to invest in is Carlisle.

Aldi Stores differ from the larger format food stores in a number of respects. Aldi Stores stock a carefully selected range of approximately 1,500 product lines, compared to a typical supermarket such as Morrisons or Asda which stock in excess of 22,000 lines. Aldi focus on quality rather than quantity. Within that range, there are further limitations, owing to the overall concept and format of the company. Aldi primarily sell own label grocery products, although occasionally there may be a small percentage (up to 10%) of branded products. Aldi do not sell pharmaceutical products and only have a limited range of confectionary. Only a small range of own branded wines and spirits are sold as well as a limited range of milk and bread lines. The stores only sell a limited range of fruit and vegetables, and meat products are pre-packed. The stores do not include specialist meat, fish, delicatessen, chemist or bakery counters, which are generally provided within larger supermarkets. Furthermore, Aldi do not operate cafes and restaurants in store.



The resulting arrangement is such that an Aldi food store does not offer a 'one stop shop' as, for example when undertaking a major food shop, customers are limited on the range of goods available, are not able to buy lottery tickets, tobacco products, etc. and will still have to shop elsewhere to purchase those products. Similarly, if a customer has a desire for a particular branded or niche product that is not available at an Aldi food store, then they will also have to visit a local shop where that particular product is available.

An Aldi food store typically has an 80/20 split of food to non-food goods which is limited in comparison with larger main food stores which have circa 35% - 40% (Sainsbury's and Asda respectively). It is important to note the significant component of the comparison goods offer provided by Aldi is made up of special items such as household durables. These items are sold on a strictly limited 'when it's gone it's gone' arrangement. The products are constantly changed from week to week, depending on what Aldi is able to identify and source. As a result, customers are more likely to be able to purchase these goods whilst in the store for the purpose of food shopping, rather than specifically visiting the store looking to purchase non-food goods.

Proposed Submission Draft Consultation – Carlisle District Local Plan

Proposed policy EC6 (Retail and Main Town Centre Uses Outside Defined Centres) states in paragraph 2;

“proposals outside of the defined centres which exceed 200sqm will be required to undertake a sequential and impact test in accordance with national policy proportionate to the scale and nature of the proposal.”

This is informed by the Carlisle Retail Study (2012) which suggests a threshold of 200sqm (gross) with regard to sequential and impact tests in the context of comparison and convenience retailing.

It is acknowledged that an importance should be placed on defined centres, committed developments and the vitality and viability of town centres when assessing proposals for retail outside defined centres. However, it is considered that the proposed threshold of 200sqm is too low. The majority of retailers, even small scale convenience shops, would exceed this threshold. In fact, the most efficient convenience units have a split of 70/30 of gross/net floor space. This means, using the 70/30 split, that any proposals out of defined centres over 140sqm floor space (net), would require impact and sequential tests. Many are less efficient and will have a lower net floorspace. This would result in almost all retail proposals (out of centre) requiring sequential and impact testing for convenience and comparison retailing.

Whilst it is recognised that a threshold is required in order to protect the vitality and viability of town centres it is considered that a threshold this low (200sqm) will prevent economic development and investment coming forwards in Carlisle. This is not consistent with paragraph 23 of the NPPF as it restricts economic growth. The NPPF highlights as a core principle that planning should proactively drive in order to achieve sustainable economic growth. It is therefore considered that the plan is unsound as it is not in line with the NPPF in this regard.

The NPPF and NPPG set a national threshold of 2,500sqm unless a locally set threshold has been adopted (over 12 times larger than the floorspace proposed in the emerging plan). It is accepted that there may be a need for a lower threshold but it is not considered the Council has considered the proposed threshold against the NPPG tests, and the proposed figure will result in an unreasonable burden on developers for almost all retail development. In this respect it will stymie sustainable economic growth.



For clarity, the NPPG tests state it will be important to consider the following in defining a lower threshold (ID: 26-016-20140306):

- Scale of proposals relative to town centres;
- The existing viability and vitality of town centres;
- Cumulative effects of recent developments;
- Whether local centres are vulnerable;
- Likely effects of development on any town centre strategy;
- Impact on any other planned investment.

It is clear from the evidence available that these tests have not been considered in setting the proposed 200sqm threshold and that this figure will actually prevent investment in the City, risking economic growth over the plan period. The retail study which is used on the basis for the policy was prepared prior to publication of the NPPG and does not consider the likely negative consequences of such a low threshold.

In addition, as previously stated, Aldi operate predominantly on brownfield sites. Restrictive policies such as proposed policy EC6 may prevent the future redevelopment of a sustainable, previously developed site along with the significant economic investment that Aldi would bring to the City.

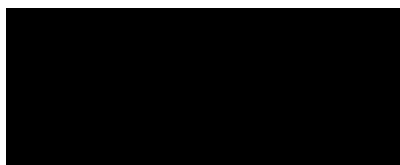
Aldi is an important employer at a national level and a significant investor in the UK economy with ambitions to invest specifically in Carlisle District. However, if the threshold in respect of sequential and impact thresholds for out of centre sites does not increase, it may prevent future investment from Aldi and others into Carlisle.

In conclusion, in respect of the proposed Local Plan, in relation to policy EC6 we consider the plan to be unsound as it is not consistent with national policy, as detailed above, and not positively prepared in respect of this policy.

We trust these representations will be taken into account in the Council's further consideration of Policy EC6 within the Local Plan.

Yours sincerely

for Signet Planning



EMMA MOON

Planner