Response ID ANON-B3JU-DSTM-C

Submitted to **Local Development Plan Main Issues Report 2019 Consultation**
Submitted on **2019-05-13 12:58:56**

About You

What is your name?

Name:
Oliver Munden

What is your organisation?

Organisation:
Avison Young

On behalf of:
Aldi Stores Ltd

How can we contact you?

Email:
[redacted]

Telephone:
[redacted]

Address:
[redacted]

1 Introduction

Section 1 provides a context for the Main Issues Report Do you have any comments in relation to this section?

Do you have any comments in relation to this section?:

3 Aberdeen City Centre and the Network of Centres

Question 5 City Centre Boundary

Do you agree the Local Development Plan should modify its City Centre boundary to match the City Centre boundary shown in the City Centre Masterplan?:

Question 6 City Centre Masterplan Intervention Areas

Do you agree that the City Centre Masterplan intervention areas should be identified as opportunity sites within the Local Development Plan?:

Question 7 City Centre Retail Core

Should the retail core be reduced to focus on a more compact area of Union Street and the existing shopping centres?:

Question 8 Union Street Frontages

Should the Union Street Frontages percentages be reviewed? Do the current target percentages ensure there is a balance between a strong retail focus and allowing for other uses? What other uses should we allow on the retail core area of Union Street:

Question 9 Out of Town Retailing

Should we direct high footfall uses to existing centres including the City Centre? Should we consider new out of town retail parks? What would the impact of these be on Union Street and the City Centre, and Aberdeen's network of centres?:
We act on behalf of Aldi Stores Ltd and welcome this opportunity to make representations to the emerging Aberdeen City Local Development Plan: Main Issues Report.

Background

Aldi Stores Ltd currently operates over 80 stores across Scotland including two within the Aberdeen city area; the first at Beach Boulevard Retail Park and the second at Cornhill. Aldi are therefore under-represented within the city and are keen to expand their presence, both in number and geographical spread, in future years to make their high quality and award winning products and prices available to a greater share of Aberdeen's local communities.

Economic pressures on households and incomes has driven competition within the food retail sector, with many consumers seeking better for value for money, as well as greater choice. This has resulted in consumers spreading their expenditure across a number of retailers, as well as replacing the traditional weekly shop with a number of shopping trips during the week. This has created favourable conditions for operators like Aldi to expand their offering in Scotland, and Aberdeen is no exception.

As such, this representation is made on the basis that across Aberdeen city, we hope that the emerging LDP creates the necessary and positive planning policy framework to encourage the growth of retailers like Aldi to help meet these changing convenience retailing demands. This will also enable the considerable benefits attr buted to a typical Aldi development to come forward and which would typically include:

• Improving consumer choice, bringing qualitative benefits and responding to growing demand for operators, like Aldi, that can offer greater value for money;
• Creating up to 30 new jobs per store and helping support employment growth elsewhere through Aldi's commitment to the Scottish food and beverage industry, all of which are well above the national living wage.
• Additional jobs created during construction, often up to 45 employing those from within the local area as well as job creation for suppliers and within the Aldi distr bution chain.
• Helping promote more sustainable shopping habits, by typically being located within easy walking distance of housing areas
• Helping improve social mobility by improving access to goods that support healthy living.
• Enhancing links with local suppliers and therefore supporting the local economy;
• Supporting over 80 Scottish suppliers, including all mi k and eggs which are 100% Scottish;
• Over 400 Scottish products available in stores
• Boasting a product range which is at least 25% Scottish.

Aberdeen City and Aberdeenshire Retail Study 2013
Whilst it is recognised that the Main Issues Report discusses various retail considerations including the town centre first and sequential approach advocated by Scottish Planning Policy, it is disappointing to note that no reference is made to the Aberdeen City and Aberdeenshire Retail Study 2013.

Although the report is a number of years old, consideration of it is particularly important within the next LDP in that it outlines significant demands for both convenience and comparison new retail floorspace across the city region in the future, which it is considered Aldi could assist to positively address.

Notable commentary within the report includes the statements at page 88 of the report, where the specific differences offered by Aldi as a 'Limited Assortment Discounter' are recognised specifically in respect to their 'local scale' and the role they can provide in complementing existing independent shop provision in protected centres. The limited offer and lower turnover results in a reduced scale of impacts, with diversions focused principally on the larger scale 'big 4' supermarket operators, which can be beneficial in terms of increasing competition and reducing grocery prices for consumers.

Given the scale of the city's population and existing provision, it is noteworthy that the report focuses principally on global assessments of deficiencies comparing expenditure potential with existing turnover within large zonal areas. For the purposes of assessing city-wide needs this is useful, however, it is important to recognise that more localised deficiencies, both quantitative and qualitative, can still be present, particularly where shoppers in certain areas of the city have to travel far distances to have good access to a mix of convenience provision. This can lead to unsustainable shopping patterns contrary to environmental policy objectives of the Main Issues Report and require to be borne in mind for decision making on future planning applications to deliver new floorspace, which specifically seeks to redress such deficiencies. This is particularly relevant for an Aldi store, where a typical catchment is between 5 and 7 minutes from the store depending on location. Typically, the larger the population within an area, the smaller the catchment tends to be.

Aldi Stores Ltd's representation to the Main Issues Report is therefore prepared within this background context and focuses upon the principal related question, no.9, in respect to future retail provision across the city. These representations should also be read to consider the whole matter of retailing rather than responding to individual questions.

Response to MIR Q9: Out of Town Retailing
Aldi supports the use of the sequential test to ensure that new retail development is located in the most appropriate and suitable location in accordance with the network of centres. It is agreed that Aberdeen City centre, as the principal strategic shopping destination within the region, should be afforded priority for the location of major new retail development, with the rest of the network offering more localised services and shops to cater for the needs of nearby communities.

Where possible and where the requirements of their successful business model can be met, Aldi often locate within such areas, as can be seen by their presence at both Westhill and the development of a new store within Ellon town centre, to the north of Aberdeen. A pragmatic approach to addressing these matters, in accordance with SPP, which affords recognition to the specifics of business models and minimum retailer requirements in terms of adequate profile, and operational needs, is essential to ensure that this does not prejudice investment into local areas.

The pro-active approach to allocating future floorspace needs by the City Council is welcomed by Aldi, and it is noted this is linked to those areas of major population growth in the future. Nevertheless, it is considered essential that the policies that emerge in respect of new convenience provision within the LDP still allow for additional opportunities to come forward in the shorter term, in areas where either a quantitative or qualitative can be demonstrated, and where other policy demands in terms of improving access bility, minimising impact and adherence to the sequential test can still be achieved.

As noted earlier, Aldi consider that there are a number of pockets within the city, where range and choice is more limited and could be improved through qualitative enhancements to provision. Aldi will be seeking to meet these needs in future years and have had recent dialogue with senior officers at Aberdeen City Council in this regard.

We welcome this opportunity to submit these representations to the Aberdeen City LDP MIR and look forward to meeting officers to discuss site potential in the near future.

Question 10 Commercial Leisure Uses

Should we continue to direct commercial leisure uses towards existing centres and the beach and leisure area?:

Question 11 City Centre Living

How can we encourage more people to live in the City Centre? Would a document outlining the principles which need to be applied in converting a building into residential use be helpful?:

MAIN ISSUE 1 Living in the City Centre

Should we include a policy in the Local Development Plan supporting residential development in the City Centre, including the conversion of upper and basement floors of premises to provide residential accommodation?:

Not Answered

Question 12 Residential Development in the City Centre

Are there any other locations within the City Centre where residential accommodation could be provided?:

MAIN ISSUE 2 A 24-Hour City

Should 24-hour activities in Aberdeen be supported and encouraged to grow, especially in the City Centre? Could this be achieved through policy?:

Not Answered

Question 13 Encouraging the Creative Arts

What can we do to support and encourage the creative sector to ensure a range of distinctive experiences so that Aberdeen City Centre is like no other place?:

Question 14 Proposals for Creative Arts

Are there other buildings or areas within Aberdeen that could accommodate the existing, and support an emerging creative sector for desk-based and studio-based artists?:

Question 15 Percent for Art

To ensure Aberdeen City Centre retains its distinctiveness, should developments with construction costs of £1 million or over be required to allocate at least 1% of construction costs for the inclusion of art projects in a publicly accessible/ visible place or places within the development?:

MAIN ISSUE 3 Support for Visitor Attractions

To support our existing visitor attractions should Aberdeen have a policy about protecting and growing visitor attractions?:

Not Answered