



Planning, Retail & Economic Statement

Hostmoor Avenue, March

July 2021



London



Harrogate



Bristol

Contents

Executive Summary	2
1. Introduction	3
2. Background to the Proposals	4
3. The Proposed Development	10
4. Planning Policy Compliance	12
5. Economic Development Considerations	18
6. Retail Considerations	22
7. Summary & Conclusions	35

Appendices

1. Site Location Plan
2. Site Context Plan
3. Officer's Pre-Application Response – 29 April 2020
4. Background to Aldi Document
5. Planning Policy Review
6. Retail Impact Tables
7. March Town Centre Health Check

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Executive Summary

This statement has been prepared on behalf of Aldi Stores Ltd. (Aldi hereafter) in support of a planning application submitted to Fenland District Council for a million-pound investment through the construction of a new Aldi foodstore to serve March.

The proposals outlined will secure the comprehensive redevelopment of a prominent underutilised site, resulting in a high quality and sustainable development, entirely consistent with the retail and commercial character of the area to the north of the town – an area identified by the adopted Local Plan as a *'broad location for growth'* (Policy LP9).

The proposals have been widely publicised locally through the distribution of a leaflet to all residents in March in November 2020, which totalled 10,749 households. Discussions have also been held with various stakeholders to inform them of the proposals. The development has been widely welcomed, with an overwhelming 95% of respondents to our pre-application consultation expressing support for the proposed development.

The submission also follows productive pre-application discussions with Fenland District Council, and the application is accompanied by a full suite of supporting documents, which set out comprehensive justification for the proposals, demonstrating compliance with core planning policy principles, including delivering and securing sustainable economic growth. In summary, the development will result in several benefits including:

- Multi-million-pound investment in the area by a national retailer, improving local retail choice and competition in the north of March;
- Comprehensive redevelopment of a prominent brownfield site which currently detracts from the streetscene for employment generating purposes within an identified location for growth.
- A high-quality contemporary and sustainable development;
- Creation of up to 50 new local jobs.
- Comprehensive package of off-site highway works agreed with the County Highway Authority, principally in the form of a signal-controlled junction at Hostmoor Avenue / and the A141 Wisbech Road.

The application documents set out how the proposals accord with key policy objectives, including in respect of delivering sustainable economic development. The application represents a significant investment that will secure considerable benefits to positively impact the immediate and surrounding area. It is respectfully requested that permission is granted.

Aldi are fully committed to the proposals and subject to planning, anticipate the new store will open in 2022.

1. Introduction

- 1.1. This statement has been prepared by Planning Potential for submission to Fenland District Council on behalf of Aldi Stores Ltd. in support of a new discount foodstore at Units 1-3 Hostmoor Avenue, March.
- 1.2. The proposals provide represent a multi-million pound investment at an unprecedented time for the UK economy, and in particular the retail sector. The store will create enhanced food shopping choice and competition in the north of March, and the opportunity to regenerate an underutilised commercial site for a more efficient employment generating use.
- 1.3. The March Trading Estate, in which the site is located on the edge of, is identified within the adopted Local Plan as a *'broad location for growth'* and it is expected *'... development in this area will be predominantly or entirely related to business uses'* (Policy LP9).
- 1.4. There are no barriers to implementation, allowing the scheme to create up to 50 new local jobs and be delivered in 2022, subject to planning permission.
- 1.5. The description of development is as follows:

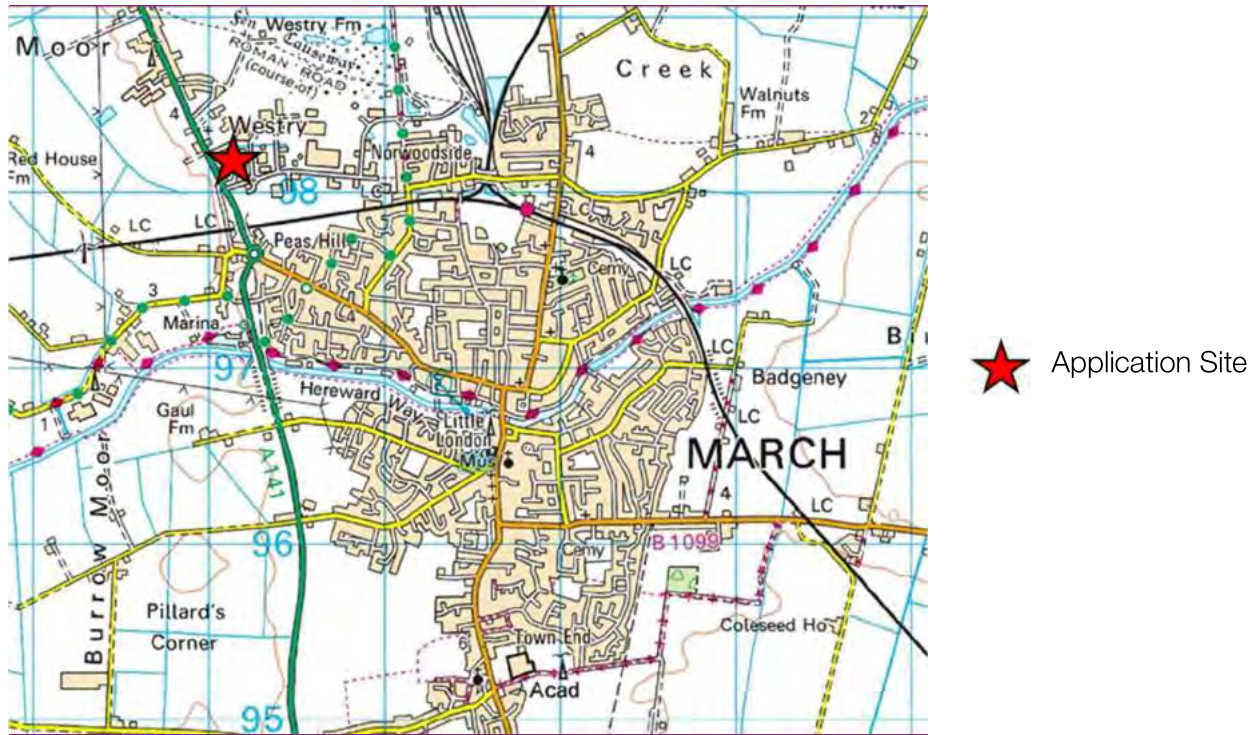
"Demolition of existing buildings on site. Redevelopment to provide a foodstore (Class Ea) and associated access, car parking, and landscaping works"
- 1.6. The proposed scheme involves demolition of the existing buildings on site and redevelopment to provide a retail foodstore, which would meet Aldi's particular retailer requirements. The proposals can be summarised as follows:
 - A standalone retail foodstore building offering 1,804 sqm of floorspace (GIA), with a net sales area of 1,315 sqm.
 - A store car park offering 106 spaces, to include 4 electric charging spaces, with 20 spaces enabled for future conversion.
 - A landscaping scheme to enhance the streetscene and introduce areas of soft landscaping at site boundaries.
 - New access off Hostmoor Avenue which will allow all movements through the junction, expect right-turn exiting from the application site.
 - A significant package of off-site highway works, with the principal feature being the proposed upgrading of the A141 / Hostmoor Avenue junction to a signal-controlled junction. The package of works has been agreed with the County Highway Authority prior to the submission of this application and we would expect these works to be the subject of a S.106 Agreement.
- 1.7. This application is submitted following pre-application discussions with officers at Fenland District Council and Cambridgeshire County Council (Highway Authority). An EIA Screening Opinion has also been issued in respect of the proposals, confirming the proposal does not constitute EIA development.
- 1.8. The application is accompanied by a comprehensive suite of documents. Subsequent sections within this Statement cover the following:
 - **Section 2** provides background to the application proposals, including a review of relevant planning history, details of pre-application discussions with officers, and a summary of Aldi's public consultation.
 - **Section 3** sets out the application proposals and provides details of Aldi's specific retail offer.
 - **Section 4** demonstrates the proposal's compliance with relevant planning policy.
 - **Section 5** considers employment land matters and provides justification for introduction of a retail use on the site.
 - **Section 6** considers the proposals in the context of the key sequential and retail impact tests.
 - To conclude, **Section 7** summarises the significant benefits of the proposals, in accordance with the wider planning objectives.

2. Background to the Proposals

Site Description

- 2.1. The application site, identified below and at **Appendix 1**, extends to approximately 0.86 hectares (2.1 acres) and is located in the north west of March's urban area, off Wisbech Road (A141) on the north side of Hostmoor Avenue.

Figure 2.1: Site Location Plan



Source: Promap (2020)

- 2.2. Specifically, the site is located at the roundabout junction of Hostmoor Avenue and Martin Avenue and currently comprises three warehouse style units and hardstanding.
- 2.3. The front portion of the site is currently occupied by Manor Packaging (formerly Brimur Packaging). This area of the site has been used as an unmanned warehouse since 2011, with the company having relocated its manufacturing operation to Whittlesey. This portion of the site therefore generates no employment.
- 2.4. The rear unit with access off Martin Avenue is used as a satellite depot for storing vehicles and materials by Stomport who provide support to utility services. Again, the warehouse is unmanned and generates no employment.
- 2.5. The three existing buildings are in Class B8 storage use and measure approximately 1,986 sqm GIA in total.
- 2.6. Both current occupiers of the site have already relocated much of their operation to other premises in the Cambridgeshire area. As the storage uses on site are unmanned, there will be no loss of jobs, with the current business activities to be retained in the area.

Figure 2.2 - Manor Packaging Area of Site



Source: Planning Potential Site Visit (2021)

Figure 2.3: Stormport Area of Site



Source: Planning Potential Site Visit (2021)

- 2.7. In respect of surrounding existing uses, as can be seen on the context plan below and at **Appendix 2**, the site is situated within predominately retail/commercial and industrial surroundings, being located within March Trading Park. Immediately to the west, the site is bounded by the recently developed Cobblestones public house and beyond this is a drive thru KFC takeaway which also fronts onto Wisbech Road.
- 2.8. Immediately to the north of the site is the Alpine Health Club facility and to the east, on the opposite side of Martin Avenue is a B&M home store and Timber and Builders Merchant. Opposite the site on the other side of Hostmoor Avenue is a large Tesco foodstore with petrol station and associated car parking. The area therefore already has an established retail presence through these uses.
- 2.9. Immediately adjacent to this there is a live application pending consideration for development of a McDonalds restaurant and drive thru. In addition, on the opposite side of Wisbech Road is a live application pending consideration for a revised retail park development. At this stage, it is therefore unclear if these schemes will come forward.
- 2.10. In terms of pedestrian access, the site is well connected to the existing network, with continuous footways on both sides of Hostmoor Avenue.
- 2.11. The nearest bus stop to the site is located in the forecourt of the Tesco store, a short walk (approximately 260m) from the application site. This bus stop serves the 33 route, providing northbound and southbound services between March and Peterborough every two hours on weekdays and Saturdays. A further bus stop is located on the A141 Wisbech Road approximately 400m walk away. This stop serves the 33 and 46 routes, with the 46 route providing weekday and Saturday services every 1.5 hours between Wisbech and Town End. Both of these routes travel through March town centre.
- 2.12. Finally, the site is not located within a Conservation Area (nor within setting of listed building), nor any other protected environmental area. Neither are there any Tree Preservation Orders (TPOs). The site is located within Flood Zone 1, which classifies the site as having a low probability of flooding.
- 2.13. A fuller description of the site and surrounding area is detailed in the accompanying Design and Access Statement (DAS).

Figure 2.4: Site Context Plan

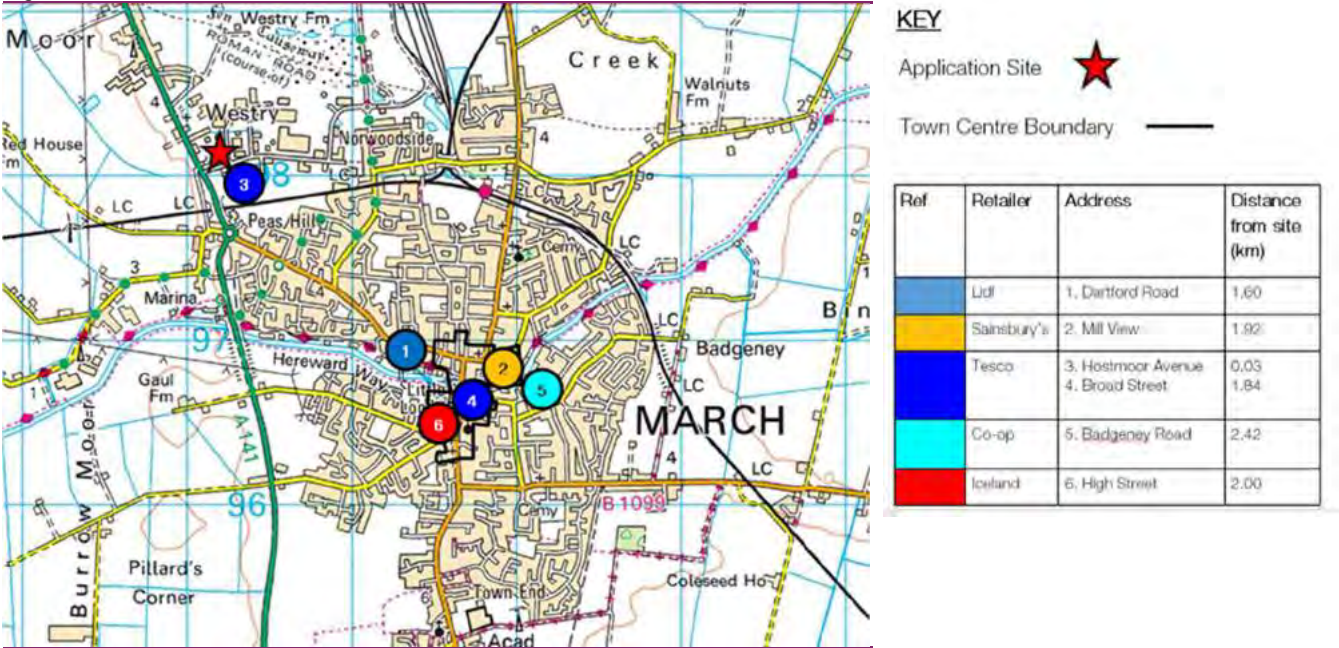


Source: Planning Potential Research (2020)

Existing Retail Provision

- 2.14. In order to understand the role and function of the proposals within the overall context of retail provision in March, it is useful to look at the location of existing foodstores, along with the location of the proposed Aldi at Hostmoor Avenue.
- 2.15. Figure 2.5 below identifies the existing on the ground distribution of foodstores within March. It can be seen from this retail provision plan that there is an obvious lack of retail choice to the north of the town, with the only main supermarket currently serving this area being the Tesco at Hostmoor Avenue.

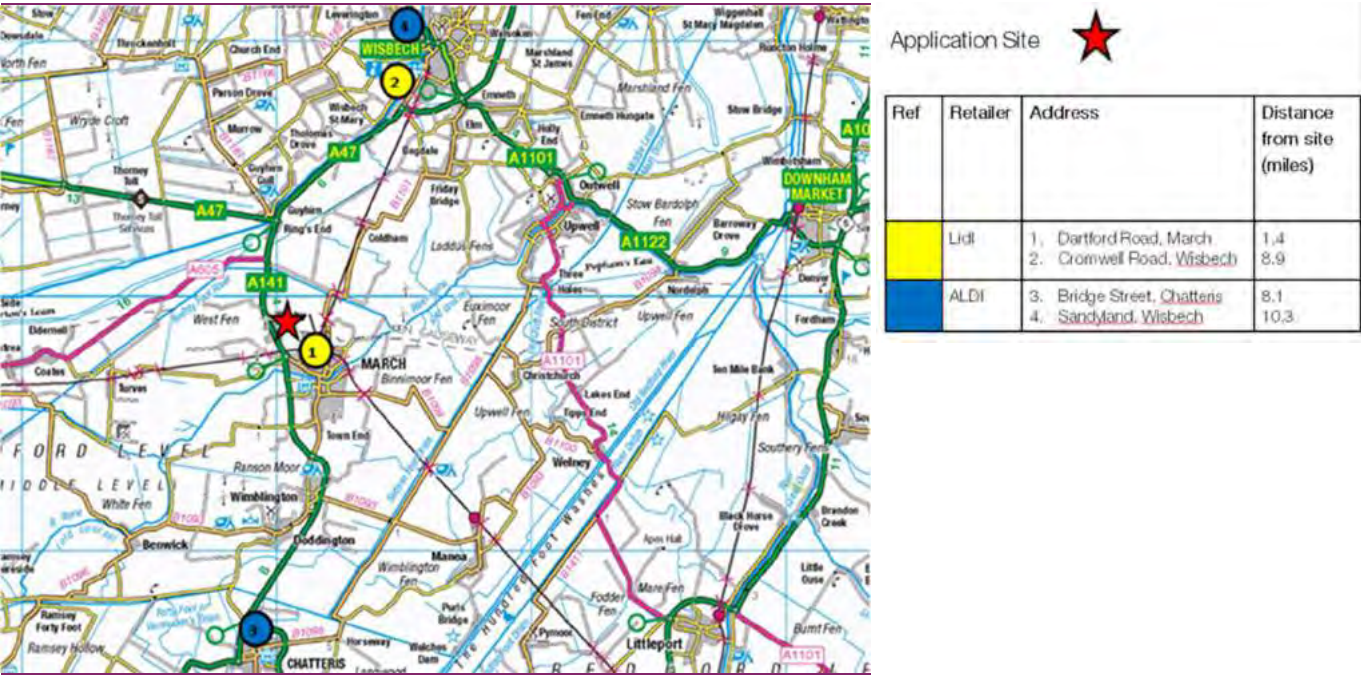
Figure 2.55: Retail Provision Plan



Source: Planning Potential Research

- 2.16. Of the 1,660 plus respondents to our pre-application consultation some 33% stated they currently shop at an Aldi store, with the store in Chatteris attracting the majority of these trips - an approximate 24km round-trip by car. Figure 4 below identifies existing discount food provision in the area surrounding March.
- 2.17. This leakage of expenditure out of the local catchment to Aldi stores is despite the existence of a Lidl store in March, demonstrating the strong Aldi brand and that residents are happy to travel significant distances to obtain food shopping choice. As such, there is clearly an opportunity to deliver further food shopping choice in the north of the town, and in turn help to encourage more sustainable patterns of development by reducing car miles.

Figure 2.6: Discounter Provision Plan



Source: Planning Potential Research

Relevant Planning History

The Site

- 2.18. The site has been subject to several applications relating to its historic employment/industrial use. The following applications are of relevance:
- 2.19. The baseline planning permission for the site was granted in February 1989 (ref: F/1697/88/F). Specifically, permission was granted for
- ‘Erection of 8 industrial warehouse units for B1, B2 and B8 uses.’*
- 2.20. Whilst in Class B8 storage use, the site therefore has historic permission for Class B1 use which now falls within the new Class E use which also now covers the proposed retail use.
- 2.21. Following this, there were a number of applications proposing minor external alterations. Further, in September 2016, permission (ref: F/YR16/0525/F) was granted for:
- ‘Erection of a building and refurbishment of 1no building for B8 with trade/counter use and refurbishment of 1no building for use as builders’ merchants and erection of a 2.4-metre-high fencing involving the demolition of 1no building; closure of existing vehicular access off Hostmoor Avenue and the upgrading of existing vehicular access from Martin Avenue with associated car parking, and secure storage area’.*
- 2.22. It does not appear that this consent has been implemented, with the permission expiring in September 2019.

Nearby Sites

- 2.23. In terms of the immediate surroundings, there are several applications that are of relevance to the proposals. Firstly, to the north west of the site, north of the existing KFC, an application (ref: F/YR17/0251/F) was granted in May 2017 for:

"Erection of a single-storey building for use as 2 x A3 units and 1 x B2 unit including the erection of a 2.1m high acoustic fence"

- 2.24. It does not appear that this consent has been implemented, with the permission expiring in March 2020.

- 2.25. In addition, on the opposite side of Wisbech Road, there is a live application (ref: F/YR18/0566/F) for a retail scheme, comprising:

"Erection of 13 x retail units (Class A1), 1 x drive-thru restaurant/coffee shop (Class A3/A5), 2 x units with A3/A5 use and associated parking and street furniture, and the erection of a pumping station, electricity substations, formation of a customer and delivery access, a new roundabout on A141, 3 x balancing ponds, involving the demolition of existing dwelling (St Mary's View)"

- 2.26. This application is currently pending consideration. It follows a previous implemented application (ref: F/YR15/0640/F) for a smaller retail park development on the same site, approved in August 2016 for:

"Hybrid application: Full planning permission for the erection of five retail units (Class A1), 2 x drive-thru restaurants/coffee shops (Class A3/A5), associated parking, access, street furniture, balancing pond, pumping station, electricity sub-station and associated works and Outline planning permission for a further 3 x retail units (Class A1) with siting and access to be determined and all other matters reserved"

- 2.27. Lastly, on the opposite side of Hostmoor Avenue at the junction with Wisbech Road, there is a live application (ref: F/YR19/1093/F) on behalf of McDonalds for:

"Erection of a 2-storey drive-thru restaurant/takeaway (Class A3/A5) with external seating area, climbing frame and associated car park, electric vehicle charging points and the formation of a new access (off Hostmoor Avenue) involving part infilling of balancing pond"

Pre-application Discussions

- 2.28. Prior to this application being submitted, a formal pre-application meeting took place with Officers in March 2020. A copy of the pre-application written response is provided at **Appendix 3**.

- 2.29. In summary, Officers were supportive of redevelopment of the site to provide an Aldi foodstore, noting the established retail / commercial surroundings and recognising the benefits of redevelopment of the site to provide an active use as well as the creation of new local jobs and further retail choice and competition for March.

- 2.30. In summary, Officers confirmed that the main issues to address were:

- Justification for loss of traditional employment floorspace;
- Approach to retail including sequential and retail impact assessment;
- Highways and accessibility.

- 2.31. These points, amongst other considerations raised at pre-application stage are addressed within this statement and comprehensive suite of documents submitted in support of the proposals.

Community Engagement and Stakeholder Consultation

- 2.32. NPPF guidance is clear that *"applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot"* (para 132).

- 2.33. Prior to submitting the application, the project team have undertaken extensive consultation and engagement, which has included:

- Engagement with key stakeholders, including locally elected representatives of the March Society. This provided local community representatives with an opportunity to view the proposals and provide Aldi with feedback.
- Distribution of a six-page community leaflet to 10,749 households, outlining the proposals and providing members of the public the chance to provide feedback via the hardcopy feedback form provided or online.

- A consultation website was set up to share the proposals and allow the community to provide feedback online.
 - Ongoing liaison with residents and key stakeholders.
- 2.34. At the time of writing, over 1,660 people have taken the time to respond and provide feedback on the proposals. This has been very encouraging with an overwhelming 95% of respondents confirming their support for the scheme when asked if they would like to see the development come forward. The majority of responses welcomed the proposed development, focusing on the introduction of further food shopping choice to March.
- 2.35. The main matter of concern raised by respondents related to highway access into the site off Hostmoor Avenue and potential impact of the store on existing high traffic flows at the junction with the A141. These concerns have been directly addressed within this application following detailed pre-application discussions with the County Highway Authority.
- 2.36. Further details on the scheme's community engagement and stakeholder consultation can be found in the accompanying Statement of Community Involvement.
- 2.37. The project team are committed to keeping people informed of the proposals, and to this end, the consultation will remain open throughout the course of the application and will endeavour to provide updates to both the Council and local residents throughout the process.

3. The Proposed Development

- 3.1. Aldi have a longstanding requirement to introduce a store to March and have been looking for an appropriate location to meet their needs for many years. The application represents the only available and suitable opportunity for Aldi to provide choice and competition locally as well as reducing the distance to travel for anyone who is currently travelling to Aldi to undertake a discount food shop.
- 3.2. The application site extends to 0.86 ha and the proposed development comprises:
- “Demolition of existing buildings on site. Redevelopment to provide a foodstore (Class Ea) and associated access, car parking, and landscaping works”*
- 3.3. The proposed development comprises of the following:
- Demolition of existing buildings on site and regeneration to provide a modern and highly sustainable foodstore development.
 - A standalone retail foodstore building offering 1,804 sqm of floorspace (GIA), with a net sales area of 1,315 sqm and a dedicated service area. The building will measure 1,881 sqm GEA.
 - A store car park offering 106 spaces, 6 of which will be for disabled users, and 10 reserved for parent and child parking. This will include 4 electric charging spaces, with 20 spaces enabled for future conversion. 8 cycles spaces for customers are proposed.
 - A landscaping scheme to enhance the streetscene and introduce areas of soft landscaping at site boundaries.
 - New access off Hostmoor Avenue which will allow all movements through the junction, except right-turn exiting from the application site. The proposed access arrangements have been agreed with the County Highway Authority prior to the submission of this application.
 - A significant package of off-site highway works is also proposed, with the principal feature being the proposed upgrading of the A141 / Hostmoor Avenue junction to a signal-controlled junction. The package of works has also been agreed with the County Highway Authority prior to the submission of this application and it is proposed that these works are the subject of a S.106 Agreement,
- 3.4. More detailed descriptions of the application proposals and the proposed highway works can be found within the accompanying Design & Access Statement and Transport Assessment.

Aldi Stores Ltd – Clarification of Aldi’s Offer

- 3.5. The proposals comprise a discount foodstore to be operated by Aldi Stores Ltd. As the named operator, it is useful to clarify Aldi’s business operations, as this sets out full context and justification for their interest in March. A detailed commentary is enclosed at **Appendix 4**; however a summary is provided below.
- 3.6. Aldi’s philosophy is simple - providing high quality products at discounted prices, within a pleasant shopping environment. Aldi does not simply sell goods at the lowest possible prices, but rather retails the highest quality goods at the lowest possible prices. Discounted prices are achieved through bulk buying and economies of scale, specialisation in the number of lines offered, and maximising efficiency within their operations. Prices are not lower because the quality of products is less, with Aldi regularly receiving widespread industry and consumer recognition of the quality of the brand.
- 3.7. This is an important distinction with Aldi and crucial to understanding how stores operate. In practice this means that, unlike larger supermarket formats, customers also have to visit other shops and services to complete their shopping trip. Further, stores have only a limited amount of non-food floorspace (up to 30% of net sales area), which mostly contains weekly specials. This is a further difference to larger supermarkets, which can have between 35%-50% non-food floorspace.
- 3.8. Crucial to this is a tried and tested store format, which the company has developed to enable goods to be handled, displayed and sold efficiently, thus enabling stores to effectively compete and provide the award-winning offer. Store layouts are eminently practical and reflect the Company philosophy of offering unrivalled value for money through cost effective management.
- 3.9. The model as presented above is accepted in the industry as being different to larger ‘superstore’ formats and retailers such as Aldi are recognised as Limited Assortment Discounters (LADs). As such, Aldi offer the same range of goods in all their stores across the UK, regardless of location. This business model and Aldi’s core operational and business requirements are a key consideration as

part of the sequential approach to site selection, as set out at Para. 88 of the NPPF. The material relevance of this to the context of this application is explained further in Section 6.

4. Planning Policy Compliance

4.1. Having set out the context in which the proposals have come forward, and the context of the site within the 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.

4.2. 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.”

4.3. The NPPF is clear at paragraph 11 that developments should be assessed against the policies in the Framework taken as a whole. This has recently been confirmed in *Asda Stores Ltd, R (on the application of) v Leeds City Council and Anon* (20 December 2019) where Justice Leiven DBE found that:

“The NPPF has to be read as a whole, and in a way that makes sense of the document as a whole. In para 11 – 14 of the NPPF the Secretary of State has used the specific term “presumption” in relation to sustainable development, and has set out a structure by which that presumption is to be applied, and in particular circumstances outweighed. This includes footnote 6 which explains how the presumption works in particular types of case (not including those that fall within para 90). As all those engaged in planning law now know, para 11 – 14 creates a “tilted balance” which gives effect to the presumption, Hopkins Homes [2017] UKSC 37.” (Paragraph 43)

“By contrast in NPPF90 the word “presumption” is not used, nor is there any suggestion of a tilted balance; or any attempt to tell decision maker that they should put more weight on one factor rather than another. It is not entirely clear whether the Secretary of State could lawfully mandate a decision maker to accord a particular factor particular weight, given the words of s.38(6) and the judgement of Lord Hoffman in Tesco Stores, that weight is always a matter for the decision maker. However, this breadth of that issues is not before me in this case. What is clear is that the Secretary of State has not tried to do so in NPPF90. It is again notable that there are paragraphs of the NPPF where the Secretary of State does say, as a matter of policy, that particular weight should be given to particular matters, e.g. para 80 where significant weight is to be accorded to economic growth.” (Paragraph 44)

4.4. This interpretation has been endorsed by the Court of Appeal in the Judgement issued on 20 January 2021.

4.5. The Development Plan against which the application proposals should be assessed comprises:

- Fenland Local Plan (Adopted May 2014)
- March Neighbourhood Plan 2015-2030 (2017)

4.6. The following comprise material considerations in assessing this development:

- National Planning Policy Framework - 2021 (NPPF) and the accompanying National Planning Policy Guidance (NPPG);

4.7. A full list of key relevant policies, together with commentary as to how these objectives are met by the proposals, is included at **Appendix 5**.

Site Allocation & Principle of Development

4.8. The site falls within an area to the north west of March identified by Policy LP9 as a ‘*broad location for growth*’ and ‘... it is expected that development in this area will be predominately or entirely related to **business uses**’ (our emphasis).

4.9. As set out in the officer’s pre-application response at **Appendix 3**, ‘*having regard to the context of the area which has considerably evolved over the past 6 years... the introduction of a further retail unit would not be out of character with this area*’. Officers also highlighted that the proposed use would be expected to generate more employment than the existing uses on site. In conclusion officers stated, ‘... *having regard to this particular site and its location I am comfortable that the principle of development can be supported*’.

- 4.10. Full details on employment considerations and how the proposals meet various policy objectives is provided at Section 5 of this Statement. However, before providing commentary on the specific allocation and policy wording, it is necessary to also consider the wider merits of the application proposals.
- 4.11. As can be seen from the Site Context Plan enclosed at **Appendix 2**, the site is located in a primarily commercial location within March Trading Estate, and is bound by retail / commercial uses on all sides. On this basis, it is clear that the on-the-ground situation surrounding the site has moved on since the area was first allocated for employment and business uses. As such, the introduction of a retail use for the site is now more appropriate and is in-keeping with uses in the immediate surroundings. This demonstrates the contribution that such facilities make to the employment function of the March Trading Estate.
- 4.12. Having regard to this and taking more of a holistic view, the introduction of a further quantum of alternative floorspace in this location is entirely appropriate. The proposals will not prejudice the future provision of employment floorspace across the remaining employment area, recognising the need to adapt and respond to changes in the locality to enable greater benefits for the surrounding community in the absence of alternatives in this instance.
- 4.13. This is consistent with the principles set out in the NPPF, where it is identified that *“planning policies and decisions need to reflect changes in the demand for land”* (Paragraph 120). Indeed, Paragraph 80 of the NPPF recognises the importance of creating conditions where businesses can invest, expand and adapt, which includes the need to be *“flexible enough to accommodate needs not anticipated in the plan...to enable a rapid response to changes in economic circumstances”* (Para.81d). Paragraph 85 goes on to reinforce the importance of enhancing existing markets to ensure they remain attractive, and where appropriate, re-introduce or create new ones.
- 4.14. The proposals are consistent with these principles, in that they represent a multi-million-pound inward investment by a national retailer to the town of March. The proposed facility would deliver additional food shopping choice and competition for March, to support both existing residents and the future residential growth that is planned for the area. In addition, the proposals will secure up to 50 new local jobs, therefore responding to the Council’s aspiration for the area, to bring forward employment generating uses.

Securing Sustainable Development

- 4.15. The NPPF requires that the planning system should *“...contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs”* (Paragraph 7).
- 4.16. In respect of plan making, it is clear that Local Planning Authorities should *“promote a sustainable pattern of development that seeks to meet the development need of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.”* (Paragraph 11a).
- 4.17. In respect of decision making, guidance is clear that proposals in accordance with development plans (and having regard to the relevant weight to be attached) should be approved and in other circumstances that development should be refused where *“any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework [NPPF] taken as a whole”* (paragraph 11b.ii).
- 4.18. The presumption in favour of sustainable development is clear that in some instances it is appropriate for local planning authorities to *“take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed”* (Paragraph 12).
- 4.19. This requires decision makers to assess proposals in a holistic way in order to establish whether the wider benefits of proposals outweigh the merits of upholding policy aspirations. At the centre of this is the presumption in favour of sustainable development, which can be broken down into social, economic and environmental sustainability. These are identified as *the “three overarching objectives which are independent and need to be pursued in mutually supportive ways”* (paragraph 8).
- 4.20. This is emphasised within Local Plan Policy LP1 (Presumption in Favour of Sustainable Development), which sets out that a primary consideration in assessing planning applications will be the development’s sustainability with the overall aim of improving the economic, social and environmental conditions of the area. Specifically, this policy states the Council will:

“Work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible and to secure development that improves the economic, social and environmental conditions in Fenland”.

- 4.21. The following commentary sets out how the proposals contribute to these key strands of sustainability, considering both national and local policy objectives.

Social Sustainability

- 4.22. To reiterate, the proposals will provide a new retail offer for March, providing increased retail choice for residents through the provision of a local discount offer, reducing the need to travel for anyone who is currently traveling to an Aldi to undertake a discount foodstore shop.
- 4.23. The proposals will secure provision of a modern foodstore, providing an accessible and comfortable customer shopping experience, as well as up to 50 new jobs for local people.
- 4.24. Further, the proposals will regenerate a prominent redundant site, significantly improving the immediate streetscene and surrounding area.

Economic Sustainability

- 4.25. The proposals represent a multi-million-pound investment by a national retailer to March.
- 4.26. The proposals will introduce additional food shopping choice and competition in the area, as well as securing at least 50 new local jobs, and a number of jobs indirectly both during the construction and operation phases. The proposals will create a significant number of employment opportunities in a location that is accessible to March and surrounding settlements and will in turn encourage members of staff to make sustainable travel choices.
- 4.27. The scheme will clearly have a positive contribution towards economic development and is therefore fundamentally supported within the overall aims of delivering sustainable development as advocated by the NPPF.
- 4.28. As set out in Section 6 of this Statement, there are no sites allocated for the type of development proposed within the Local Plan and there are no sequentially preferable sites that are suitable and available for the proposed development. Paragraph 82d of the NPPF requires *“planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable rapid response to changes in economic circumstances”*. In the absence of any suitable sites, the application site represents the most appropriate location for the proposed development.
- 4.29. The proposals will clearly have a positive contribution towards economic development and are therefore broadly supported within the overall aims of delivering sustainable development as set out within the NPPF and the provisions of Local Plan Policy LP1. This holds significant weight in any consideration of the proposals.

Environmental Sustainability

- 4.30. The site comprises brownfield land, where the principle of development is accepted in policy terms as well as with the principles of sustainable development, including making best use of previously developed land.
- 4.31. The proposals will significantly regenerate and enhance a redundant site in a prominent location within a commercial area, providing physical and environmental regeneration.
- 4.32. The proposals will also introduce landscaping along the site boundaries. This will provide both visual and environmental benefits and is considered a significant improvement to the current appearance of the site and its contribution to the surrounding area and streetscene.
- 4.33. Further, the proposals represent an opportunity to bring forward a highly sustainable development compared to the existing buildings on site, meeting relevant green and sustainability initiatives including reducing CO2 emissions and use of renewable energy. This is considered a significant net gain compared to the existing use of the site.

Highways and Accessibility

- 4.34. In compliance with Part C of Local Plan Policy LP15, full clarification on highways and accessibility considerations is provided in the accompanying Transport Assessment prepared by Connect Consultants; however, a summary is provided below for completeness.
- The site is accessible by a choice of travel modes and will reduce reliance on the private car consistent with national and local planning policy.
 - The proposed development is well conceived in terms of its access arrangements, composition and layout.

- It has been demonstrated that the service arrangements will be able to accommodate delivery traffic.
- The traffic assessment provided is based on realistic traffic scenarios, including the 'worst-case' traffic levels associated with the committed Westry Retail Park development and the proposed McDonald's. The analysis demonstrates that the proposed development net traffic effect will be minor to moderate at the study junctions.
- Capacity assessments of the proposed site access junction, Tesco Access Roundabout and Peas Hill Roundabout show that the proposed development traffic can be accommodated by the junctions.
- Following pre-application discussions with CCC regarding the operation of the existing A141 / Hostmoor Avenue Junction, an interim signalisation scheme is proposed to be implemented between the construction of the Aldi or McDonald's and the delivery of the roundabout as part of the Westry Retail Park development, depending on delivery timescales.

Parking Provision

- 4.35. The store would be supported by 106 customer car parking spaces. The council's adopted maximum parking standards are set out at Policy LP15 and Appendix A of the Local Plan and allow 2 spaces for each shop unit, with an additional space for every 20 sqm floorspace for retail units up to 1,999 sqm gross floorspace. This permits a maximum of 94 spaces for a retail development of the scale proposed.
- 4.36. The proposed development includes a provision of 106 parking spaces, which is broadly according to the standards. The additional car park spaces will aid in accommodating any unexpected and seasonal spikes in parking demand.
- 4.37. In respect of cycle parking, Policy LP15 states that provision should be appropriate to the development. The proposed development includes a provision of four cycle stands capable of securing up to eight cycles, which, based on the scale of the development and its location within the local cycle network, is considered to be appropriate by the applicant.

High Quality Design

- 4.38. The NPPF attaches great importance to the design of the built environment (paragraph 126). Good design is a key aspect of sustainable development and should contribute positively to making places better for people. Local Policy LP16 also sets out guidance in respect of design, including requirements for appropriate building layout and scale, respect for local character and surroundings, effective use of land, consideration of amenity and appropriate landscaping and drainage.
- 4.39. Full clarification on the specific design rationale is provided in the accompanying Design and Access Statement, however a summary is provided below. The site is currently underutilised with part of site being vacant, and therefore the proposals will result in considerable uplift and enhancement for both the site and surrounding streetscene.
- 4.40. The application site is not within a conservation area and its location within a predominately industrial and commercial area presents the opportunity to put forward a contemporary development. The development is of an appropriate scale and is sited in such a way to respect the surrounding environment and visual appearance of the area. The design team have carefully considered the proposals and the design is felt to respond and enhance the surrounding area to create high quality development.
- 4.41. In addition, Aldi wishes to ensure that store design and layout is optimal, so that local residents benefit from a state-of-the-art store that will meet the demands likely to be placed on it over the long-term. With this in mind, the proposals have ensured a suitable layout, which includes a dedicated access, Aldi's standard store envelope, alongside an acceptable car parking and servicing solution.
- 4.42. The design of the building itself is simple yet contemporary in style, reflecting the commercial style of existing buildings in the vicinity, with significant glazing on front and side elevations with cladding in other areas to create visual interest.
- 4.43. The proposed design is entirely in accordance with Local Plan Policy LP16(d), which requires new development to *"make a positive contribution to the local distinctiveness and character of the area, enhance its local setting, respond to and improves the character of the local built environment ... and not adversely impact, either in design or scale terms, on the street scene, settlement pattern or the landscape character of the surrounding area"*.
- 4.44. The proposed design also supports the principles set out in Policy DM3 of the Delivering and Protecting High Quality Environments in Fenland SPD (2014).
- 4.45. Further details of the specific design of the proposed foodstore is provided in the accompanying Design and Access Statement.

Landscaping

- 4.46. Full clarification on landscaping is provided in the accompanying Design and Access Statement and Landscaping Plan, however, in summary, the site will benefit from a comprehensive hard and soft landscaping scheme. The primary focus will be along the boundaries of the site, which will considerably improve the site and wider streetscene.
- 4.47. The proposed landscape scheme is consistent with the objective set by adopted local Policy LP16 which seeks delivery of high-quality environments, including provision of well-designed hard and soft landscaping environments.

Sustainability and Energy Efficiency

- 4.48. Full clarification on sustainability considerations is provided in the accompanying Design & Access Statement, however a summary is provided below for completeness. This has been a key aspect of the proposals and the store is designed to maximise potential sustainability features. The scheme is therefore entirely consistent with Policy LP14 which encourages new developments to incorporate measures to help combat the longer-term impacts of climate change.
- 4.49. The Aldi store operation is highly sustainable through the high level of efficiencies achieved through its operations. Stores generate very little waste – delivery vehicles leaving the store will often take away waste generated (i.e. saving the need for a second trip specifically to collect waste), where this will be taken away to be recycled or (in the case of food) made into fertilizer or animal feed. Aldi will typically also try to double up on deliveries, whereby one vehicle will visit more than one store, thereby also reducing road miles.
- 4.50. Of course, performance extends to beyond the construction phase and ensuring efficient and effective operations are also part of Aldi's wider sustainability philosophy. Aldi's sustainability initiatives include the following:
- Aldi has been certified to ISO 50001 since 2015, demonstrating that energy is managed effectively across all stores, offices and RDCs in line with international best practice;
 - Aldi recertified to the Carbon Trust Standard in May 2018, with a market leading score of 92% for carbon management practices;
 - By purchasing 100% renewable electricity, Aldi generates zero carbon emissions from this energy consumption across all stores.
 - Installation of CO2 refrigeration in all new stores, which is significantly less damaging to the environment than the previously used hydrofluorocarbon (HFC) refrigerant gases;
 - Installation of energy efficient LED lighting in all new stores, which uses significantly less electricity than standard lighting;
 - Heating within the building is supplied by Air Source Heat Pumps supplemented by heat recovered from the refrigeration process. There are no combustion systems in the development.
 - Areas within the welfare area are further supplemented with energy efficient electric panel heaters connected to the BMS for energy monitoring and time control.
 - Aldi recycle 100% of all plastic and cardboard waste generated in store.

Amenity Considerations

- 4.51. Given the site's industrial and commercial surroundings and distance from the nearest residential properties, there will be no material loss of amenity for neighbouring uses as a result of the development.
- 4.52. This is supported by an Environmental Noise report prepared by Sharps Redmore, which is informed by comprehensive surveys to consider the potential impact on existing noise sensitive properties. This concludes that the site can be developed as proposed without resulting in the kind of significant impact or disturbance to local residents that the National Planning Policy Framework seeks to avoid. The proposal is therefore in accord with Local Plan Policy LP16(l), ensuring development *"does not adversely impact on the amenity of neighbouring users such as noise"*.
- 4.53. In this context, the report does not consider it necessary to place restrictions on opening or delivery hours. The site layout allows the servicing area to be located away from any residential properties, which will reduce the potential for any noise disturbance. In addition, unlike other supermarkets, there will be no external transfer or lifting of delivery pallets as all goods are directly offloaded from the delivery vehicle into the store internally using a docking system. Goods are then wheeled in cages directly off the lorry into the warehouse, without the use of a tailgate or any lifting equipment.

- 4.54. Further, given the arrangement at Aldi, where lorries share the car park with customers, it is a more satisfactory arrangement where delivery vehicles can visit the store outside of normal trading hours to avoid conflict with customers.
- 4.55. Aldi have experienced well-documented growth in recent years, with more people visiting stores and consequently increasing pressure to ensure that shelves are fully stocked when a store opens. This is especially crucial in respect of fresh produce, as if a full range of goods is not provided, this greatly affects customers' perception of the store. Therefore, it is neither commercially practicable, nor desirable, that shelves are being stocked when customers enter the store. Many of Aldi's goods are transferred on pallets, which block aisles and restrict customer flows. This is particularly unhelpful for wheelchair users, the mobility impaired and customers with buggies and young children. Such factors are a consideration of all retailers but are particularly relevant to Aldi, given the limited retail sales area compared to larger supermarket formats.
- 4.56. Efficient and flexible delivery hours are therefore an essential and legitimate component of Aldi's commercial operation. The NPPF is clear that planning should, where possible, support business needs, including *"significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs..."* (para 81). Ensuring efficiency is essential in respect of convenience retail, which relies on an extremely complex daily logistics chain to service stores and provide the retail offer customers expect.

Ecological Considerations

- 4.57. A Phase 1 Ecological Survey was undertaken by Ecology Solutions in June 2020 and has been submitted in support of this application. This comprised habitat surveys in order to ascertain the general ecological value of the site and to identify any habitats and associated species present.
- 4.58. The report concludes that the majority of the habitats present on site are of limited value and no evidence of protected species was identified. Subject to recommendations to retain and enhance landscape planting, the report confirms that no further ecological input is required.
- 4.59. As such, there are no overriding reasons to suggest that this site could not proceed for the development proposed on ecological grounds.

Health Impacts

- 4.60. As required by Policy LP2 of the Local Plan, this application is accompanied by a Health Impact Assessment (HIA), which is commensurate with the scale and form of development proposed. The HIA demonstrates that the proposed development will result in only minor health impacts, and overall will lead to enhanced access to high quality and affordable food for the residents of March.
- 4.61. The HIA has been undertaken in accordance with relevant national guidance and demonstrates compliance with Policy LP2.

Air Quality

- 4.62. As required by Fenland's Validation Guidance, this application is accompanied by an Air Quality Assessment. This concludes that the application site is not within a designated Air Quality Management Area and the estimated background concentrations at the site are considered to be within relevant air quality standards. Further, the impact from traffic generated by the proposed development is not considered to be significant and a quantitative air quality assessment is not required.
- 4.63. The assessment concludes that the proposed development is unlikely to be adversely affected by or have a significant impact on local air quality. The proposal is considered to be in accordance with Policy LP6 of the Local Plan and paragraph 105 of the NPPF.

Flooding and Drainage

- 4.64. The application site falls within Flood Zone 1, which therefore classifies the site as having a low probability of flooding and therefore, a Flood Risk Assessment is not required. This was confirmed by officers at the pre-application stage.
- 4.65. A Drainage Strategy has been prepared by Stirling Maynard in support of the application, detailing the proposals' approach to surface water drainage. This sets out the proposed Sustainable Urban Drainage System in the form of a filter drain, swale, permeable paving and an attenuation tank. The proposals would ensure compliance with Part B of Local Plan Policy LP14.

5. Economic Development Considerations

- 5.1. This section considers the proposed development in light of the jobs that will be created both during construction and operational stages, the economic benefits that the scheme will deliver, the appropriateness of the use in this location and the recognition of the commercial nature of retail development in the recent changes to the Use Classes Order. The proposed development will deliver significant economic growth and productivity and therefore in accordance with paragraph 81 of the NPPF this should be afforded significant weight.
- 5.2. Paragraph 81 of the NPPF is clear that:
- “Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. **Significant weight should be placed on the need to support economic growth and productivity** [emphasis added], taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”*
- 5.3. This was written before the recent coronavirus pandemic, which has further highlighted the valuable contribution that the retail sector makes both in terms of providing employment opportunities and also ensuring that communities have easy access to healthy and affordable food. With the increasing move towards a more sustainable future providing crucial facilities such as food shopping in accessible locations is increasingly important.

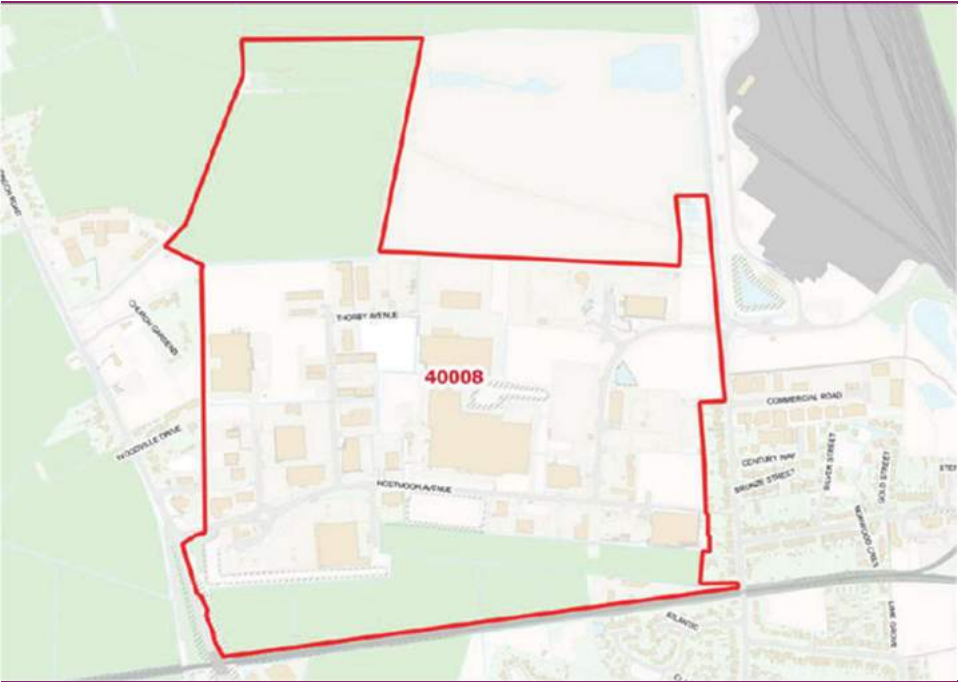
Site Allocation

- 5.4. The site falls within the south west corner of the allocated March Trading Estate, which is identified by Policy LP9 as a ‘broad location for growth’ and ‘... it is expected that development in this area will be predominately or entirely related to **business uses**’ (our emphasis).
- 5.5. As set out in the officer’s pre-application response at **Appendix 3**, ‘having regard to the context of the area which has considerably evolved over the past 6 years... the introduction of a further retail unit would not be out of character with this area’. Officers also highlighted that the proposed use would be expected to generate more employment than the existing uses on site. In conclusion officers stated, ‘... having regard to this particular site and its location I am comfortable that the principle of development can be supported’.
- 5.6. The proposed retail use would clearly constitute a ‘business use’ as envisaged by Policy LP9, and such a use would be acceptable in principle in an area characterised by retail and leisure uses – with reference to the context plan provided at **Appendix 2**.
- 5.7. As an historic employment site within the defined March Trading Estate the site is also covered by Policy LP6 which seeks that; ‘Opportunities for jobs growth will be maximised’. Whilst this policy seeks to retain sites in employment areas for traditional B Class uses, this policy is now outdated given the on the ground situation and following the recent changes to the Use Class Order and introduction of a new Class E which includes both retail and B1 uses.
- 5.8. Policy LP6 is perhaps more relevant in protecting the core area of the trading estate for traditional ‘employment uses’. However, it is in no way reflective of the on-the-ground situation in March, with the site now being surrounded by retail and leisure uses, which already make up a significant part of the employment contribution of the Trading Estate. Further, these uses are also clustered and are also in the vicinity of the proposed Westry Retail Park scheme to the west of the Hostmoor Avenue/A141 junction. Many of these uses have been approved since the adoption of Policy LP9, with retail and leisure uses clearly being types of ‘business uses’ envisaged in this growth area.
- 5.9. The proposed retail use would therefore be entirely in keeping with the prevailing retail character of the immediate area of the site, complementing these facilities and uses.

Loss of B Class Floorspace

- 5.10. Notwithstanding the proposed retail use is entirely reflective in what is now an established retail location, the proposals will result in the loss of a small quantum of B class employment land covered by Policy LP6. However, the commentary below demonstrates that this will be negligible with significant employment land remaining at the March Trading Estate to meet future demand.
- 5.11. The evidence base for the emerging Local Plan, specifically the Strategic Housing & Economic Land Availability Assessment Report (Stage 1) March CP Site Report (February 2020), identifies that the March Trading Estate (broad location for growth) comprises 78.41 ha of land. This area includes existing retail and leisure uses in the vicinity of the application site and is shown at Figure 5.1 below.

Figure 5.1: Extent of March Trading Estate



Source: Fenland District Council Strategic Housing & Economic Land Availability Assessment Report (Stage 1) March CP Site Report (2020)

5.12. In considering this, whilst the proposals will result in the change of use of a small quantum of allocated B1/B8 employment land to allow the introduction of retail, the table comparison below demonstrates this will be negligible, representing just 1.1% of the total land area recognised by the Council as March Trading Estate.

Table 5.1: Breakdown of proposals within March Trading Estate Area

Application Site Area (ha)	March Trading Estate Area (ha)*	% of Area
0.86 ha	78.41 ha	1.1%

Source: Planning Potential Research

*Strategic Housing & Economic Land Availability Assessment Report (Stage 1) March CP Site Report (2020)

5.13. Notwithstanding, it is noted that some land within this total area already comprises non-B class uses, i.e. the Tesco and other commercial uses surrounding the site and so the calculation has been adjusted to take into account land already comprising alternative uses that contribute to the character of this particular site. Based on the red line area shown below, approximately 66 hectares of land across March Trading Estate is either currently in B class employment use or vacant.

Figure 5.2: Approx. Extent of March Trading Estate



Source: Google Maps (2020)

5.14. Even adopting this more stringent approach to remove the land already taken up by alternative uses, the table below demonstrates that Aldi would still comprise only 1.3% of existing and available employment land across March Trading Estate.

Table 5.2: Breakdown of proposals within March Trading Estate Area

Application Site Area (ha)	Approx. March Trading Estate Area (ha)*	% of Area
0.86 ha	66 ha	1.3%

Source: Planning Potential Research

*Figure excludes land area in alternative uses such as retail / commercial.

5.15. It is clear from this exercise that regardless of how these figures are derived, the percentage of retail development remains negligible when looking at the quantum of B class employment uses across the area as a whole.

Economic Development Considerations

5.16. It is well-documented that the retail sector is under immense pressure at the current time and has suffered numerous high-profile casualties in recent years. Indeed, the period of retrenchment is unprecedented, making it all the more crucial to support successful and expanding retailers.

5.17. In this instance, the proposals will secure up to 50 new local jobs, including both full and part time opportunities, as well as additional opportunities during the build phases. It is important to recognise that the uses on site at present currently generate no employment. Both businesses who currently occupy the site do so unmanned, simply using the existing buildings for storage. The application proposals therefore offer the opportunity to generate a sizeable net gain in jobs for the local area, significantly increasing the employment density on the site.

5.18. This employment generation is entirely in accordance with wider objectives of the Local Plan which sets a vision for increasing employment opportunities and directing this employment growth to the District's market towns, of which March is one (Policy LP3).

5.19. The retail sector as a key form of employment is widely acknowledged, with paragraph 3.5.1 of the Local Plan stating that it is an aspiration of the council; *'... to broaden the economy so as to offer a wider choice of employment opportunities and achieve a more*

balanced economy'. This approach is entirely consistent with the wider aspirations of the NPPF, which strongly supports sustainable economic growth and job creation, and this should be given significant weight when assessing the proposals.

- 5.20. Further, as the site is underutilised it currently offers little benefit or function for the surrounding community. Regeneration and redevelopment for an Aldi foodstore would provide the local community with additional and affordable food shopping choice where a specific need has been identified, reducing the need to travel to Wisbech or Chatteris to visit Aldi.
- 5.21. In this regard, it is especially relevant to note that the Aldi stores in both Wisbech and Chatteris are located in broadly similar locations, next to traditional employment uses, and have therefore been recognised as 'business uses' and important employment generating uses by the council.
- 5.22. In conclusion, even though the proposals will result in the change of use of a small quantum of traditional employment uses, it is widely established and accepted that retail still provides a form of valuable employment and the importance of these jobs should clearly not be overlooked.

6. Retail Considerations

6.1. This section provides further context in respect of the retail background to the proposals.

Addressing a Local Deficiency

- 6.2. Aldi has a longstanding requirement for a store in March. Through our consultation prior to the submission of this application it has been identified that many of March's residents are currently leaving the town to shop at an Aldi store. Of the 1,660 plus respondents to our pre-application consultation some 33% stated they currently shop at an Aldi store, with the store in Chatteris attracting the majority of these trips - an unsustainable approximate 24km round-trip by car.
- 6.3. This leakage of expenditure out of the local catchment to Aldi stores is despite the existence of a Lidl store in March, demonstrating the strong Aldi brand and that residents are happy to travel significant distances to obtain food shopping choice. As such, there is clearly an opportunity to deliver further food shopping choice to serve the town and to provide competition to Tesco in the north of the town.

Aldi Stores Ltd. – A different Retail Offer

- 6.4. 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 is also provided at **Appendix 4**.
- 6.5. 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.
- 6.6. 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.
- 6.7. 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'.
- 6.8. 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.
- 6.9. Therefore, to complete their shop, 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.
- 6.10. 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'.

Retail Policy Tests

- 6.11. The principal policies for assessing town centre and retail uses are set out in paragraphs 87-91 of the NPPF, which sets out that retail centres remain the preferred location for new development.
- 6.12. Both the NPPF and adopted local policy LP6 are clear that where proposals do not relate to existing centres and are not in accordance with an up-to-date development plan, they are required to demonstrate compliance with the sequential test.
- 6.13. In addition, Paragraph 90 of the NPPF requires proposals for retail development outside of town centres and not in accordance with an up-to-date development plan to be supported by a retail impact assessment if the development is over a proportionate, locally set floorspace threshold. In this case, Policy LP6 of the Fenland Adopted Local Plan sets a threshold of 500 sqm and, as such, the application is supported by a proportionate and appropriate retail impact assessment.

Sequential Site Assessment

6.14. Given the site's 'out of centre' location, in accordance with Policy LP6 of the Local Plan and paragraph 87 of the NPPF it is necessary to undertake a sequential site assessment to determine whether there are any sequentially preferable sites that are suitable and available to accommodate the proposed development.

6.15. Paragraph 2b-011-20190722 of the National Planning Policy Guidance (NPPG) states that:

"Wherever possible, the local planning authority is expected to support the applicant in undertaking the sequential test, including sharing any relevant information. The application of the test will need to be proportionate and appropriate for the given proposal. Where appropriate, the potential suitability of alternative sites will need to be discussed between the developer and local planning authority at the earliest opportunity."

6.16. As set out in Section 2, pre-application discussions took place with the council in advance of this submission and it was confirmed officers were unaware of any sequential sites, other than those which have been considered and discounted by the sequential assessment submitted in respect of the Westry Retail Park proposals (F/YR18/0566/F).

Assessing Alternative Sites: Suitability & Availability

6.17. Guidance is clear that when carrying out a sequential assessment, it is important to consider whether a site is suitable and available for the development being proposed. Full background to the development proposed and Aldi's retail offer are provided at Section 3 and **Appendix 4** of this Statement. The NPPF is clear at paragraph 88 that *"applicants and local planning authorities should demonstrate flexibility on issues such as format and scale"*.

6.18. In considering sites, we have had regard to case law that has influenced the interpretation of the NPPF (and NPPG). This case law has included the principles established by the Supreme Court in their judgement with regard to a challenge by Tesco Stores Limited in Dundee (Ref: [2012] UKSC 13), which was further clarified by the Secretary of State decision at Rushden Lakes (Ref: APP/G2815/V/12/2190175; 11 June 2014).

6.19. The Dundee Judgement concludes that, when assessing a potential sequential site, this should be based on *"...whether an alternative site is suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site"* [our emphasis].

6.20. The Dundee case confirms the importance of reflecting commercial reality within the sequential test, commenting that, *"...criteria are designed for use in the real world in which developers wish to operate, not some artificial world in which they have no interest doing so"*. In this regard, it is further evident that development proposals and requirements are a clear material consideration, as if this cannot be achieved, it is simply unreasonable to expect them to trade from an inferior site or location.

6.21. More recent guidance has been provided with regard to the application of the sequential test through a High Court judgment relating to an out of centre food retail proposal in Mansfield (Aldergate Properties Limited and Mansfield District Council and Regal Sherwood Oaks Limited; CO/6256/2015; 8 July 2016). This judgment builds on a Secretary of State decision relating to a mixed-use retail proposal in Exeter (Land North of Honiton Road and West of Fitzroy Road; APP/Y1110/W/15/3005333) dated 30 June 2016.

6.22. Both decisions re-emphasise the 'town centres first' principle. They provide further clarity with regard to the assessment of potential sequentially preferable sites in terms of their 'suitability', 'availability', and the need for the applicant to demonstrate flexibility. In particular, the Mansfield decision confirms that when reviewing potential alternative sites:

- The terms 'suitable' and 'available' mean suitable and available for the *"broad type of development which is proposed in the application by approximate size, type and range of goods."* (Paragraph 35).
- This is to include the requirement for flexibility and *"excludes, generally, the identity and personal or corporate attitudes of an individual retailer"* (Paragraph 35).
- In terms of a site's 'availability', this relates to a site's availability for the type of retail use for which permission is sought and not to its availability to a particular retailer (Paragraph 42).

6.23. The Mansfield decision therefore confirms that the sites covered by the sequential test search should not vary from applicant to applicant depending on the identity or specific retail model proposed. It is clear, for example, that the requirements of an individual retailer, their commercial attitudes, site preferences and competitive preferences should not dictate those sites that are 'suitable' or

‘available’ (Paragraph 38). In other words, sequential sites in town centres cannot be dismissed simply because an operator does not wish to compete with its own existing or committed stores located in or close to that centre.

- 6.24. It is clearly acknowledged through the Courts and Appeal decisions (as set out above) that the purpose of flexibility is not to require the application to be transformed into something significantly different. Singularly the most important factor in retail considerations is the nature and scale of the retail proposed and, accordingly, its intended role and function.
- 6.25. The sequential assessment set out below has been undertaken in the context set by both relevant policy and the clarification provided through this case law and decisions.

Catchment Area

- 6.26. In line with best practice, including the distribution of local retail uses and local geography; the search focused on centres within the primary catchment area the store will serve.
- 6.27. As is detailed below in the impact assessment, the primary catchment area for the proposed development is the urban area of March and its surrounds. This is consistent with Zone 2 as defined in the Fenland District Retail Study Update (2009)
- 6.28. To this end, the sequential assessment has considered whether any site exists within Zone 2 which could accommodate the proposed development, and which would be in a more accessible and sequentially appropriate location.

Flexibility

- 6.29. As already set out above, Aldi are recognised as a Limited Assortment Discounter whose business model is distinguishable from other forms of convenience retailing.
- 6.30. In accordance with paragraph 88 of the NPPF it is necessary to demonstrate flexibility in undertaking the sequential site assessment. Operational requirements are very valid requirements when undertaking a sequential site assessment. This was accepted by Inspectors at Gillingham (APP/N215/W/18/3195092) and Southport (APP/M4320/V/15/3002637) when considered the alternative sites against the *“broad type of development proposed”*. Whilst demonstrating flexibility there are legitimate constraints to the extent to which a flexible approach can be adopted without prejudicing the operating model. Therefore it is reasonable to proceed with the sequential site search on the basis of a LAD operator rather than a ‘typical’ foodstore. This includes:
- A site that can facilitate a store of unrestricted retail floorspace on a single storey, in order to enable efficient and safe circulation around the store and allow for the full product offer;
 - A site that can accommodate surface level car parking to allow for safe and convenient customer access to the store;
 - A site that allows sufficient space for the safe manoeuvring of customer and delivery vehicles;
 - A site in a visible location to attract trade and that is accessible by means other than a car i.e. pedestrians, cyclists and a choice of public transport;
 - A site that provides a dedicated service area to allow access from the road network through the carpark by HGVs.
- 6.31. This sets out a number criteria that Aldi considers when pursuing a site and while a degree of flexibility is often necessary, sites that do not meet the above requirements will simply not be pursued. However, to factor in flexibility, the assessment allows for a 10% reduction in site area / store size.

Site Assessment

- 6.32. Our assessment has followed a plan-led review of sites suggested in various policy and evidence base documents, as well as previous applications and a review of availability on the market.
- 6.33. Fenland’s adopted Local Plan (2014) does not identify any retail sites within March. However; the March Neighbourhood Plan (2017) identifies three key development sites in the Town Centre:
- Site 1 – Land to the west of the High Street
 - Site 2 – Land to the south of Station Road
 - Site 3 – Land to the north of Centenary Church

- 6.34. The Council's Retail Study (2009) also identifies Site 1 (Land to the west of the High Street) as a potential site for redevelopment. However, the retail study suggests that redevelopment could cover a larger area, and that the potential development site comprises the area to the south and west of Acre Road. These sites are assessed in respect of their suitability and availability below.
- 6.35. In addition, it is understood that the Council are promoting sites for new local centres within areas of strategic housing expansion. Of those identified at Policies LP7 and LP9, the proposed development at West March (strategic allocation) is proposing a new local centre. While no formal planning application has been submitted to date, it is noted that a Scoping Opinion application (ref: F/YR20/0807/SCOP) was submitted in August 2020 for a residential development of c.1,200 homes, 2 primary schools, new local centre, open space, allotments and associated infrastructure.
- 6.36. It is material to note that although likely to come forward, this local centre does not yet have consent or indeed exist and the NPPF makes clear that it only requires sequential assessment of sites *'expected to become available within a reasonable period'*. In any case, even if development of this centre was further advanced or indeed, was 'shovel ready', it is clear from the Scoping Opinion application that, with an area proposed of c.0.5 ha, any retail element will fulfil a localised function in supporting the growing population created by surrounding residential expansion, by providing residents with an accessible top-up retail offer.
- 6.37. Indeed, the Environmental Statement Scoping Report submitted in support of the scoping opinion application clearly states that the proposed local centre *"will include units suitable of accommodating a range of uses compatible with its role in meeting the local needs of March West with an overall gross floorspace of less than 500 sqm"*. (page 10). Based on this, the proposed local centre is not designed to accommodate the type of foodstore offering proposed, and in any event, will not be large enough to do so, and so can be discounted from the sequential assessment on this basis.
- 6.38. We have also considered the extant Westry Retail Park scheme to the west of the application site within the context of the sequential test. As detailed in Section 2, consent was granted in 2016 for a retail park including a convenience foodstore comprising 1,719 sqm GIA and 1,203 sqm net. The site is also subject of a revised application seeking to amend the scheme and reduce the foodstore to just 697 sqm net. Whilst technically implemented, this scheme has not come forward and there are clearly doubts over delivery of a scheme which is based on providing a significant level of comparison floorspace at the current time. There is no certainty that this scheme will come forward in a reasonable period of time, as set by paragraph 87 of the NPPF, and is therefore unavailable for the proposed development. Notwithstanding, if this scheme was to come forward and become available, it represents an out of centre location and is not sequentially superior to the application site.
- 6.39. Further, a desk top review of any further sites was undertaken of any additional sites to include in this sequential assessment. Visits to March were also undertaken in February 2021 to identify any sites which may have become vacant as the result of the current market conditions and impact of coronavirus. The March Town Centre Health Check provided at **Appendix 7** identifies vacancies within March town centre, however the largest represents only circa 280 sqm of floorspace. No additional sites have been identified for further consideration within this sequential assessment.
- 6.40. A review of sites which have been assessed is provided below:

Site 1 – Land to the west of the High Street site and Acre Road / City Road Site.



- 6.41. Policy TC2 of the March Neighbourhood Plan allocates 1.5 ha of land (Site 1 - redline above) for a retail-led mixed-use development. The Fenland District Retail Study Update (2009) also recognises this area for potential redevelopment, along with additional land to the west to create a larger total area of 2.6 ha (Acre Road / City Road Site – blue).
- 6.42. It is clear from the allocation policy that the entire site is allocated for comprehensive redevelopment. Although it includes an element which would potentially be suitable for some retail development, the aspiration is for this to come forward as part of a wider mixed-use development to secure regeneration of this part of the town centre.
- 6.43. In considering the suitability of this site, it is first important to note that the aspiration for development of this site has been in existence for at least 10 years being recognised as a potential opportunity in the Council's Retail Study in 2009. In that context, the fact that the market has not responded is telling.
- 6.44. Indeed, the Council's Study notes, *'In location terms, a retail development at the site could therefore function as a town centre scheme. Nevertheless, tying the site into the main High Street shopping frontage might be challenging. Punching through the High Street frontage would not be straightforward because of the presence of historic properties. Furthermore, some site assembly would be required, various existing businesses would have to be relocated and as noted above, existing car parking at the site would also have to be replaced either in situ or elsewhere in the town centre area'*.
- 6.45. The site clearly has significant constraints including vehicular and servicing access arrangements, existing residential uses and location partly within March Conservation Area and the historic character of existing buildings. Further, the Neighbourhood Plan also refers to the land ownership, identifying that the site is currently in multiple ownerships. This highlights the site's complexity and provides a possible explanation why the site has not come forward for development to date.
- 6.46. Even if the site was a) available, b) all ownerships were aligned and c) there was a comprehensive strategy, it is necessary to look in more detail at the uses envisaged and the breakdown of these. It is noted there is specific preference for any development to include retention of the existing leisure centre and library, replacement town centre car parking, shopping frontage along the high street as well as improved pedestrian linkages through the area. ALDI clearly does not fit within this criterion and would be unable to deliver a comprehensive multi-level mixed-use scheme to facilitate major regeneration of the town centre as aspired by the site allocation.
- 6.47. Notwithstanding and without prejudice to this clear position, Aldi has looked at potential sites within this allocation area for completeness, and at the current time, we are not aware of any available units. On the basis that the allocation seeks comprehensive mixed-use redevelopment and the units within this area are not currently available, the site is not considered a suitable or available sequential opportunity and can be dismissed on this basis.

Site 2 – Land to the south of Station Road



- 6.48. This site extends to just 715 sqm (0.07ha) and is therefore too small to accommodate the proposed development.
- 6.49. In any event, in November 2019, outline permission (ref: F/YR18/1108/FDL) was granted for redevelopment of the site to provide a part 2-storey, part 3-storey and part 4-storey building comprising a retail unit at ground floor and up to 26 x flats above.
- 6.50. The site is therefore not suitable or available for the proposed development.

Site 3 - Land to the north of Centenary Church (73-85 High Street)



- 6.51. This site extends to just 1,204 sqm (0.12ha) and is therefore far too small to accommodate the proposed development. The site is also in multiple ownerships and is constrained in terms of its shape and surrounding road network / uses.
- 6.52. In addition, in June 2020, permission (ref: F/YR20/0204/F) was granted on part of the site to the rear for demolition of existing commercial buildings and erection of a dwelling. This further reduces the available land for redevelopment.
- 6.53. Further, most of the commercial units along the High Street frontage are currently occupied and therefore not available, i.e. no. 85 High Street is currently operating as a long-established Florist and no. 73, a hairdresser. Nos. 81-83 High Street have permission (F/YR16/0109/F) for change of use from an electrical shop to a café. There are also residential flats at first and second floors which are currently occupied.
- 6.54. On this basis, the site is not suitable or available for the proposed development.

Summary of Sequential Assessment

- 6.55. With reference to paragraph 88 of the NPPF, when considering out of centre sites, preference should be given to accessible sites which are well connected to a town centre. The application site represents an accessible out of centre location, well related to existing retail and leisure uses in proximity to a direct bus link to the town centre.
- 6.56. In the absence of any other available or suitable site within the catchment area, the application site represents the most sequentially appropriate, and only location to introduce further choice and competition into the local catchment.
- 6.57. The sequential test is therefore passed as set by Policy LP6 of the Local Plan and paragraphs 87 and 88 of the NPPF.

Assessment of Retail Impact

- 6.58. In accordance with paragraph 90 of the NPPF and Policy LP6 of the Local Plan it is necessary to undertake an impact assessment to assess whether the proposed development will have a significant adverse impact on existing, committed or planned public investment in a centre, and the impact on town centre vitality and viability. The national Planning Practice Guidance (NPPG) sets out that:

“As a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). Retail uses tend to compete with their most comparable competitive facilities.” (Paragraph 2b-015-20190722).

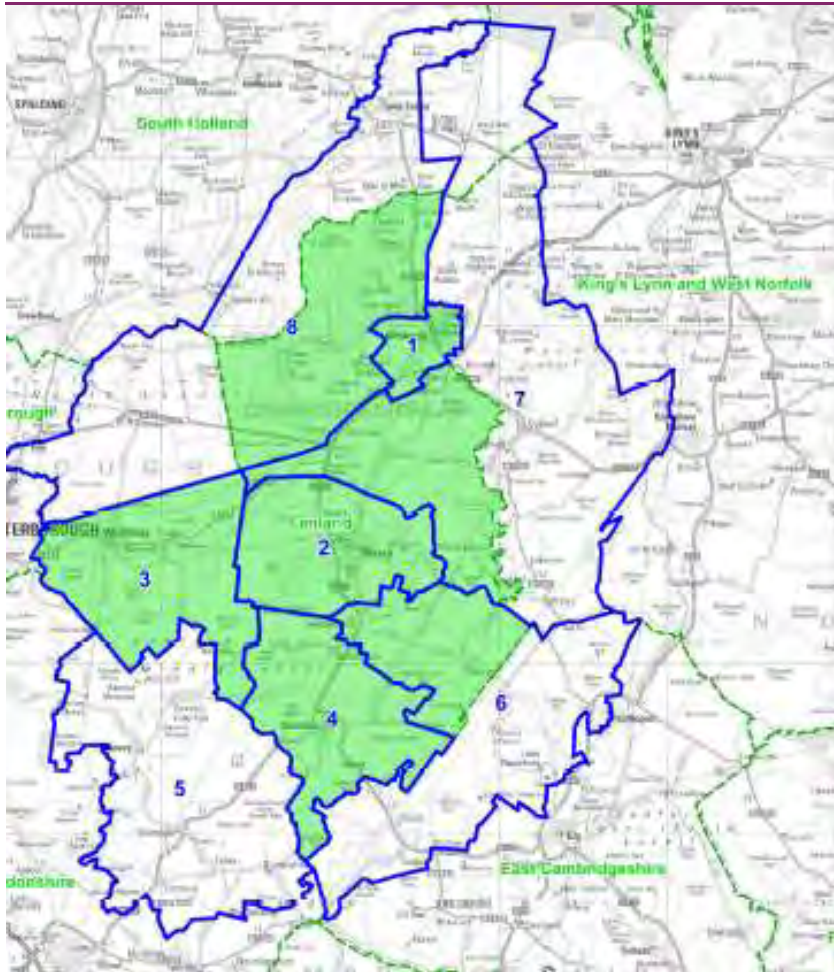
- 6.59. The NPPG goes on to state that: *“the impact test will need to be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible”.* (Paragraph 2b-017-20190722). The NPPG then goes on to set out a checklist to follow in applying the impact test.
- 6.60. A full set of impact tables is attached to this statement at **Appendix 6** demonstrating the step-by-step approach that has been followed as set by the NPPG, and provides an appropriate assessment undertaken in a proportionate and locally appropriate way.

- 6.61. In accordance with policy requirements this assessment specifically considers the impact of the proposed development on the overall vitality and viability of March town centre. Whilst the impact on individual retailers may be more than others, this alone is not a reason to refuse an application.

Evidence Base:

- 6.62. As advocated by the NPPG as referenced above, the impact assessment presented below has been undertaken in a proportionate and locally appropriate way, drawing on existing information where possible.
- 6.63. The principal evidence base is an April 2015 NEMS household survey commissioned to support the first application (Ref: F/YR15/0640/F) submitted by Brossman Mills Ltd in respect of the Westry Retail Park scheme, and which is also the basis for the same applicant's impact assessment for their revised application (Ref: F/YR18/0566/F) which is still pending a decision. This survey represents the most up to date analysis of shopping patterns for March, and itself was based on a 2006 survey commissioned by the council, as reported in the Fenland District Retail Study Update (2009). The 2009 Study established eight survey zones covering the Fenland district, with Zone 2 representing March's main catchment area. Figure 6.1 below identifies Zone 2.
- 6.64. Reference has also been made to the retail impact analysis submitted in respect of the revised retail park scheme (Ref: F/YR18/0566/F) and as set out in Contour Planning's Retail Statement, December 2017 (CPRS). This impact assessment was independently assessed by the council's retail consultant Peter Brett Associates who confirmed in July 2019 that the revised retail park scheme would not have a significant adverse impact on March town centre and the impact test as set by paragraph 89 (now para 90) of the NPPF was passed.
- 6.65. Given the Westry Park permission remains extant and in order to allow for consistency in assessing this application within the same parameters, our assessment draws on the publicly available data and as reviewed by the council's independent retail consultant. As explained below, adjustments are made to this in respect of;
- Projecting population forward to 2024 in line with the 0.8% annual growth rates assumed in the 2017 CPRS. It is noted that this is potentially an underestimate given the 3,100 new homes for March covered by Strategic Allocations which are still to come forward.
 - Projecting available convenience expenditure to 2024 using an annual growth rate of 0.5% assumed in the 2017 CPRS.
 - Using the latest company sales density figures from Mintel UK Retail Rankings with conversion to a 2015 price base to be consistent with the 2017 CPRS.
 - Making allowances for floorspace efficiency growth for all stores and the Westry Retail Park development (should it progress), as per Experian Retail Planner Briefing Note 18 (October 2020).
 - Inclusion of turnover and trade draw estimates to account for the introduction of an Aldi store to serve March.
 - Providing combined impact estimates assuming that both Aldi and a foodstore at Westry Park come forward.
- 6.66. The general approach of utilising existing available evidence and taking account of the levels of impact identified in respect of the Westry Retail Park development was agreed during pre-application discussions. This is considered to represent an appropriate and consistent means of assessing and comparing potential impacts of both the Aldi and any development at Westry Park. Notwithstanding and without prejudice, we respectfully reserve the right to undertake separate analysis should this aspect become disputed.

Figure 6.1 – Survey Zones



Source: Fenland District Retail Study Update (July 2009)

Establish the state of existing centres and the nature of current shopping patterns (base year):

- 6.67. Prior to assessing the retail impact of the proposed development it is necessary to understand the performance of March town centre, the only town centre within Zone 2. Accordingly, **Appendix 7** contains a Health Check of the town centre which is based on the most recent Experian Goad data available (October 2020) and Planning Potential's own visit to the town, as recently as February 2021.
- 6.68. Despite the Covid pandemic and lockdowns, which has limited the ability of many businesses in March town centre to trade, our Health Check indicates that March is a relatively healthy and viable centre. We reserve the right to update our health check analysis once lockdown measures are further relaxed to assess the latest position.
- 6.69. The town centre is more a service and leisure destination with limited national comparison retailers, with a strong variety of independent businesses. The town centre has a relatively varied convenience retail offer, anchored by the Sainsbury's supermarket, with Lidl also represented at an edge of centre location.
- 6.70. The centre caters well for the day-to-day food shopping needs of residents but does not fulfil all needs with the out of centre Tesco being the dominant destination within the March urban area, and high levels of comparison shopping trips being leaked to higher order centres with a greater offer.
- 6.71. In respect of existing convenience shopping patterns, the 2015 NEMS survey provides an indication of where residents are currently fulfilling their needs. The top convenience shopping destinations for residents of March (Zone 2) are set out in the table below:

Table 6.1: Main Food Shopping Destinations

Store	NPPF Location	Market Share
Tesco, Hostmoor Avenue	Out of Centre	43.9%
Sainsbury's, Mill Hill	In Centre	21.8%
Lidl, Dartford	Edge of Centre	14.7%
Iceland, High Street	In Centre	3.0%
Other March		6.6%
Outside of Zone 2		9.8%

Source: Table 2, Appendix 6

Determine the appropriate timeframe for assessing impact, focusing on impact in the first five years, as this is when most impact will occur:

6.72. A base year of 2021 has been used to inform this assessment and a design year of 2024, representing the year when the store would be expected to achieve a mature trading pattern should it begin trading in 2022. This is in line with the PPG which states (para. 2b-018-20190722) the most appropriate design year as *'conventionally taken as the second full calendar year of trading after the opening of each phase'*.

Examine the 'No Development' Scenario:

6.73. Table 1 of **Appendix 6** sets out the population and expenditure per head figures for Zone 2 and identifies total available convenience expenditure in 2021 and 2024, respectively.

6.74. As outlined, for consistency population figures for Zone 2 have been obtained from Table 1, Appendix 2 of Contour Planning's Retail Statement - December 2017 (CPRS), submitted and corroborated in respect of application F/YR18/0566/F. A per annum population growth figure of 0.8% has been added for consistency.

6.75. Convenience expenditure per head figures for Zone 2 have also been obtained from CPRS, Table 2b Appendix 2, with an annual growth rate of 0.5% added for consistency.

6.76. Convenience expenditure growth of £1.99m has been identified for the 2021 to 2024 period.

6.77. However, as noted, this growth in expenditure is based on population estimates which exclude 3,100 new homes allocated as part of Strategic Allocations for March, as set out in Policy LP9 of the adopted Fenland Local Plan (2014). Whilst these homes have yet to be delivered, March is expected to experience significant housing growth in future years which in turn would result in a significant increase in available convenience goods expenditure within Zone 2.

6.78. Based on the expenditure per head figures identified and an average household size of 2.27 people, it is estimated that 3,100 new homes would generate £14.99m of new convenience expenditure in 2024. This future expenditure has not been included in our impact assessment as the new homes are still to secure permission, however it is relevant in demonstrating future housing growth in March will need to be supported by an appropriate retail offer. As set out below, this level of expenditure growth itself would comfortably absorb Aldi's estimated convenience turnover (£12.75m in 2024 – see Table 3 at **Appendix 6**).

6.79. Table 2 of **Appendix 6** presents the 2015 survey derived turnover for each of the stores, with market share figures for Zone 2 derived from Table 8, Appendix 2 of the CPRS. Inflow from other survey Zones into Zone 2 has also been accounted for. Total store turnover has been set against company average benchmark levels.

6.80. Table 2 highlights that March's three main foodstore destinations are currently overtrading by a combined total of £19.2m. In addition, Planning Potential visited all stores in February 2021 to ascertain the range of products sold in each relative to those proposed by Aldi. Observations were also made in regard to store performance. A summary of these observations and the trading position of each store is set out in the table below:

Table 6.2 – Assessment of Main Foodstore Performance in 2021

Store	Level of Over / Under Trading	Store Observations
Tesco, Hostmoor Avenue	+£13.1m	The store has a wide comparison offer (approx. 25-30% of sales area) as is typical in Tesco stores of this size, with the remainder offering a wide range of convenience goods. The store and car park were particularly busy at the time of our visit, reflective of the strong trading position this store has in March and the wider area.
Sainsbury's, Mill Hill	+£3.3m	The store has a range of comparison goods (approx. 25-30% of sales area) as is typical of Sainsbury's stores of this size, with the remainder offering a wider range of convenience goods. The store and car park were reasonably busy, however many free spaces were observed in the store car park suggesting less linked trips taking place with town centre during lockdown.
Lidl, Dartford Road	+£2.8m	The store has a rotating provision of comparison goods in the middle aisle in addition to a wider provision of convenience goods. At the time of survey the store and car park were busy and had the appearance of a well trading store.
Total	+£19.2m	

Source: Table 2, Appendix 6 and Planning Potential Research.

6.81. The no development scenario has also been assessed at 2024, as set out in Table 4 of **Appendix 6**. This is based on the current market shares for stores which attract expenditure from Zone 2 and estimated benchmark store turnovers. This highlights that the three main foodstores in March set out above would be overtrading by a combined £17.9m in 2024 if no new foodstores entered the local market.

6.82. It is observed that the levels of overtrading currently experienced by these three main foodstores would comfortably absorb Aldi's expected convenience turnover in 2021 and at 2024.

Assess the Proposal's Turnover and Trade Draw:

6.83. The turnover of the proposed Aldi store has been calculated with reference to up to date Mintel figures adjusted to 2015 prices to be consistent with the figures used within the CPRS.

6.84. Table 3 at **Appendix 6** sets out the expected turnover of the proposed Aldi store in 2021, with sales density growth based on Experian Retail Planning Briefing Note 18 (October 2020) to estimate store turnover at 2024. The proposed store would be expected to have a convenience turnover of £12.75m by 2024.

6.85. Table 6 at **Appendix 6** estimates the pattern of trade draw that would be expected for the proposed Aldi store. This has been derived from our analysis of existing trading patterns within Zone 2 which includes a high proportion of inflow into Zone 2 from adjacent zones. The trade draw figures are also reflective of the 'like-affects-like' concept set out within the NPPG (Paragraph 2b-015-20190722).

6.86. Through our consultation prior to the submission of this application of the 1,660 plus respondents some 33% stated they currently shop at an Aldi store, with the store in Chatteris attracting the majority of these trips. This leakage of expenditure out of Zone 2 to existing Aldi stores is despite the existence of a Lidl store in March, demonstrating the strong Aldi brand and that residents are willing to travel significant distances to visit a store.

6.87. Table 6 estimates that the majority of Aldi's turnover would be expected to be drawn from stores in March: Tesco (45%), Lidl (20%), Sainsbury's (10%), respectively. Aldi will draw the highest proportion from Tesco due to the proximity of the store to the application site and due to the strong trading position of this store in the local catchment.

6.88. Some 7.5% of Aldi's trade would be in the form of clawback of current lost expenditure from Zone 2 to competing stores outside of Zone 2, i.e. existing Aldi stores. 15% of inflow from outside of Zone 2 is also anticipated, which is reflective of the existing pattern of stores in March drawing expenditure from adjacent zones and the rural hinterland around March.

Consider a range of plausible scenarios in assessing the impact of the proposal on existing centres and facilities:

- 6.89. Having established the level of trade draw from existing stores to the proposed Aldi, it is appropriate to consider various scenarios in assessing impact, including taking account of known commitments which will influence shopping patterns if developments are built-out.
- 6.90. The following scenarios have been considered in this case:

Scenario 1 – No development.

- 6.91. The no development scenario in 2024 is set out in Table 4 at **Appendix 6**. This is based on constant market share and the high combined overtrading figures for the existing three main foodstores in March as set out above.

Scenario 2 – Westry Retail Park Solus Impact.

- 6.92. This is based on the scenario that the retail park development comes forward on its own, without the proposed Aldi development. This is set out in Table 5 of **Appendix 6**.
- 6.93. The estimated turnover and diversion figures are derived from Table 11, Appendix 2 of the CPRS and is based on the revised retail park scheme with reduced convenience floorspace, and which is still pending determination (F/YR18/0566/F). Whilst an initial retail scheme has been implemented and is technically a commitment (F/YR15/0640/F) this included provision of an Aldi foodstore as part of the development.
- 6.94. As Aldi have no intention of occupying the retail park and the developer has themselves submitted for a revised scheme which is presumably their preferred development scenario, it is appropriate, in the context of this application, to consider impact on the basis of delivery of the pending application. Table 5 sets out the solus impact of the retail park scheme at 2024.
- 6.95. This scenario identifies 7.4% of overall convenience impact on March town centre. The greatest levels of potential impact will be to the out of centre Tesco and edge of centre Lidl stores. Even then, such impacts remain within acceptable levels and it is noted that these levels of trade draw and impact have been considered acceptable by the council's independent retail consultant when responding to planning application F/YR18/0566/F.

Scenario 3 – Proposed Aldi Solus Impact

- 6.96. Table 6 at **Appendix 6** sets out the solus impact of the introduction of an Aldi at 2024, should the Westry Retail Park scheme not come forward. We would reiterate that the proposed development represents Aldi's preferred location for delivering a store in March, and can provide short term investment, job creation and food shopping choice.
- 6.97. This scenario identifies 12.4% of overall convenience impact on March town centre. However, it should be noted that for the purposes of this assessment the edge of centre Lidl store has been identified as being within the town centre to ensure consistency with the assessment previously carried out in support of the Westry Retail Park scheme. Technically the Lidl store is in an edge of centre retail location, being outside of the defined town centre boundary identified on the council's proposal map.
- 6.98. Again, the greatest potential impacts under this scenario would be the out of centre Tesco given the absence of competition to the north of the town, and Lidl store. Notwithstanding, despite the introduction of Aldi, the three main foodstores in March (Sainsbury's, Tesco and Lidl) would continue to overtrade by a combined £6.7m demonstrating that the trading position of none of these stores would be significantly threatened.

Scenario 4 – Combined Impact of Retail Park and Aldi

- 6.99. Table 7 at **Appendix 6** considers the combined impacts of Scenarios 2 (Westry Retail Park Solus Impact) and 3 (Aldi Solus Impact).
- 6.100. This scenario identifies 19.8% of overall convenience impact on March town centre, the vast majority of which would be as the result of trade diversion from the current strong performing Sainsbury's and Lidl stores. Whilst this is considered to be an unlikely scenario due to the uncertainty over delivery of the retail park scheme, it is significant that both stores would remain trading around company benchmark levels. The potential impacts are not at levels that would cause either store to close.

Set out the likely impact of the proposal clearly, along with any associated assumptions or reasoning, including in respect of quantitative and qualitative issues.

6.101. However, it is not the purpose of the impact assessment to protect the position of an individual operator and instead is to consider potential impacts on a centre as a whole. As set out below, once the wider trading position of March town centre is assessed, potential impacts are only further reduced.

6.102. The ‘overall impact’ of the proposed Aldi store on March town centre is set out in Table 8 at **Appendix 6** and reproduced below for ease of reference:

Table 6.3 – Overall March Town Centre Impact

Location	2024 Turnover (£m)	Westry RP Diversion (£m)	Westry RP Impact (%)	Aldi Diversion (£m)	Aldi Impact (%)	Combined Diversion (£m)	Combined Impact (%)
<u>March Town Centre</u>							
Convenience	33.5	2.5	7.4	4.1	12.4	6.6	19.8
Comparison	46.9	3.6	7.7	0.9	1.9	4.5	9.6
Total	80.4	6.1	7.6	5.0	6.3	11.1	13.8

Source: Table 8 in Appendix 6

6.103. It has been assumed that approximately a third (32.5%) of Aldi’s estimated comparison floorspace would be diverted from March town centre which is consistent with the convenience diversion figure at Table 6, **Appendix 6**. Given the nature of Aldi’s comparison offer (see **Appendix 4**) and focus on weekly specials, the reality is that Aldi’s comparison expenditure will be drawn from other large format foodstores and the store will not compete on a ‘like for like’ basis with independent town centre businesses. Therefore, in reality, the £0.9m of town centre comparison diversion to Aldi is likely to be an overestimation.

6.104. Table 7.4 above identifies that the overall solus impact of the proposed Aldi development on March town centre would be 6.3%. This is significantly below the 9.2% figure the council’s independent retail consultant considered as acceptable when advising in respect of the revised retail park application (F/YR18/0566/F – Peter Brett Associates letter dated 24 July 2019).

6.105. The combined impact figure of 13.8% is above the identified level of impact established by the retail park application, however as identified at our Table 6, the majority of Aldi’s impact on the town centre will be in the form of trade diversion from Sainsbury’s and Lidl, two well performing stores whose overall trading position will not be threatened by Aldi’s introduction.

6.106. We highlight again that our town centre impact analysis includes the edge of centre Lidl store which is not protected by retail policy, and if excluded from the analysis above would have the effect of significantly reducing overall town centre impact.

6.107. Turning to quantitative and qualitative considerations, we reiterate points already covered in this section to further demonstrate the positive impact the introduction of an Aldi into March would have on local shopping patterns, including consumer choice.

6.108. Firstly, our impact analysis has excluded the significant population increase expected in March as the result of the Strategic Allocation for 3,100 new homes in the town. Whilst these homes are still to secure planning permission, it is understood they are in the pipeline and are expected to come forward. As identified, this would generate a significant quantitative need for future convenience floorspace to serve the town’s increased population and, in itself, would generate sufficient new convenience expenditure within Zone 2 to support not only the proposed Aldi, but further floorspace, whilst further cushioning potential impacts, which are not at levels of concern.

6.109. Secondly, as identified by Aldi’s pre-application consultation, 33% of March’s population are currently travelling out of Zone 2 to shop at an Aldi store, with a high proportion travelling to the Chatteris store – an approximate 24km round-trip by car. This indicates a clear qualitative deficiency in March’s offer which could be directly addressed through the introduction of the proposed store. Addressing this qualitative deficiency would also have the associated benefits of encouraging more sustainable shopping trips and reducing car miles and carbon emissions.

6.110. Having set out our detailed impact analysis it is appropriate to consider the proposals against the two key impact tests at paragraph 90 of the NPPF:

The Impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposals.

6.111. It should be recognised that the proposed development would deliver several positive benefits / impacts which are not quantifiable within an impact assessment, but which should be balanced against any perceived adverse impacts.

6.112. The proposed development will make a considerable physical and financial contribution towards the local economy, leading to more sustainable shopping patterns and convenience spend within March, resulting in linked trips and spin-off trade for the town centre. This is a significant boost from an economic development and retailing perspective and goes some way to offsetting the impacts of trade diversion from Aldi's main competitors and a town centre.

6.113. In addition, the proposal will create around 50 new local jobs in store, in addition to jobs associated with the construction phase. Combined, these are strong positive economic impacts that should be considered during the assessment of this development, and represent a form of private investment which will have a positive impact on the town of March as a whole, including the town centre.

6.114. The proposed development would also complement wider initiatives for March town centre, which has received the recent boost in the form of the award of £6.4m from the Government's Future High Street Fund. We understand this investment will help deliver plans to revitalise the Broad Street, Market Place and Acre Road areas, whilst enhancing the riverside area and reducing town centre traffic.

6.115. There is no evidence to suggest that the proposed development would adversely impact on these important plans for the town centre, nor on any further existing, committed or planned public and private investment in March town centre.

The impact of the proposal on town centre vitality and viability, including local consumer choice

6.116. The impact analysis set out above and in **Appendix 6** clearly demonstrates that significant levels of convenience expenditure generated within the local catchment are being drawn to out of centre retail destinations, i.e. Tesco in the north of the town, whilst many residents are travelling out of the town altogether to access an Aldi store.

6.117. As has been demonstrated, the proposed store would compete on a like-for-like basis with existing high performing stores in the town, providing greater choice in food shopping and leading to a greater retention of expenditure within the local catchment.

6.118. If the Aldi store were to come forward on its own it has been shown that town centre impact would be well within previously established levels and would not result in a significant adverse impact on overall town centre vitality and viability.

6.119. Should the Westry Retail Park scheme also come forward, whilst combined impact levels would increase, this would be focused on established large format supermarkets whose overall trading position would not be threatened. The levels of impact identified would again not result in a significant adverse impact on overall town centre vitality and viability.

6.120. To the contrary, the evidence is that an Aldi would positively widen local choice in food shopping, meeting a current qualitative need within March, and help to address future quantitative need envisaged by the Local Plan.

Summary of Sequential and Impact Matters

6.121. The above and attached justification has set out a comprehensive analysis of retail policy considerations; namely assessment of the sequential and impact tests.

6.122. In respect of sequential, our assessment has demonstrated that there are no suitable and available alternative sites within March within a more sequentially appropriate location than the application site. As such it is concluded that the proposed site is the most appropriate location within March to introduce an Aldi store to the town and deliver the associated benefits.

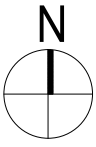
6.123. The impact assessment has demonstrated that the proposed development will not have a significant adverse impact on March town centre, and indeed will result in positive benefits in respect of consumer choice for existing and future residents.

6.124. Accordingly, this application is in accordance with the key paragraphs 87-91 of the NPPF, and Policy LP6 of the adopted Local Plan.

7. Summary & Conclusions

- 7.1. This statement has been prepared on behalf of Aldi Stores Ltd. in support of a planning application proposing regeneration of land at Hostmoor Avenue, March, to allow redevelopment and delivery of a modern Aldi foodstore development.
- 7.2. The proposals provide the opportunity for Aldi to meet a long-standing requirement for a store to serve the March catchment area to meet customer demand and introduce retail choice and competition in the town.
- 7.3. This Statement and the supporting documents (as set out in the covering letter) have demonstrated the considerable benefits of the proposed development including compliance with the principle aims and objectives of the National Planning Policy Framework and Development Plan policy including securing sustainable economic growth.
- 7.4. These 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 regeneration of under-utilised brownfield land, making more efficient use of the site and 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.
 - The proposal also includes a significant package of off-site highway works, with the principal feature being the proposed upgrading of the A141 / Hostmoor Avenue junction to a signal-controlled junction.
- 7.5. 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 March, and it is respectfully requested that planning permission is granted.

Appendix 1 – Site Location Plan



SUBJECT TO SITE SURVEY, CONFIRMATION OF LEGAL BOUNDARIES, SITE CONSTRAINTS & HIGHWAYS

THE HARRIS GROUP LTD DOES NOT ACCEPT LIABILITY FOR ANY DEVIATION FROM OUR DRAWINGS OR SPECIFICATION

APPLICATION SITE AREA (RED LINE) 8,662 SQM; 2.14 ACRES; 0.86 HECTARES

-	dd-mm-yy	-----		---	---
Rev	Date	Description		Rev By	Chk'd By
Project Title	PROPOSED ALDI FOODSTORE HOSTMOOR AVENUE MARCH TRADING PARK MARCH PE15 0AX				
Client	ALDI STORES LIMITED - CHELMSFORD				
Status	PLANNING				
Scale	1:1250	Drawing Size	A3		
Date	01.05.20	Drawn By	JPG	Checked	---
Drawing Title	LOCATION PLAN				
Job-Dwg No	2909-CHE-100			Rev	-

- ☐ 2 St. Johns North, Wakefield, WF1 3QA t. 01924 291800
- ☐ Carvens Warehouse, 77 Dale Street, Manchester, M1 2HG t. 0161 2388555
- ☒ The Old Rectory, 79 High Street, Newport Pagnell, MK16 8AB t. 01908 211577
- ☐ 101 London Road, Reading, RG1 5BY t. 0118 9507700
- ☐ 10 Gees Court, St Christophers Place, London, W1U 1JJ t. 0207 4091215



Appendix 2 – Site Context Plan



KEY

- Application Site
- Commercial / Retail Development
- Proposed Commercial / Retail Development
- Employment Use

Non-Employment Commercial Development

Development	Area (ha)
Tesco Superstore	2.7
B&M Bargains	0.6
Marston's / KFC	0.7
Alpine Health Club	0.25
Pilgrims Ford	0.5
Meadowlands Retail Park	1.1

Committed Commercial Development

Proposed Retail Park	6.5
Proposed McDonald's Restaurant	0.45
Proposed A3 Units	0.2

Title: Site Context Plan

Source: Google Maps (2019)

Author: DH / Job Number: 4842N



Appendix 3 – Officer’s Pre-Application Response – 29 April 2020

Katia Clarke
Planning Potential Ltd
Magdalen House
148 Tooley Street
London
SE1 2TU

Contact: Gavin Taylor
Development Services
Direct Dial Tel: 01354 622329
E-mail: gtaylor@fenland.gov.uk

Our ref: 20/0005/PREAPP
Your ref:

29 April 2020

Dear Katia

Erection of retail building at 1-3 Hostmoor and 1 Martin Avenue, March, Cambridgeshire

Thank you for your enquiry received 10 January 2020 in reference to the above. This advice follows our initial meeting at the Council's offices on 6th March with your client and officers from Cambridgeshire County Council's Transport team also in attendance.

The enquiry relates to development of c.0.85Ha of 'B' use class land to a retail unit with 1,315 sqm of net sales area (1,804 sqm gross floorspace). The site is currently occupied by an industrial building (former packaging operation) and to the north – open storage land and warehouse for a civil engineering company. The site lies in Flood Zone 1 (low risk). The main site is currently accessed directly via Hostmoor Avenue but with a separate access serving the storage land via Martin Avenue.

The site previously benefitted from planning permission in 2016 for a primary B8 use but with trade counter for a Builders Merchants ref; F/YR16/0525/F. It is understood that this was not implemented and this permission has now lapsed.

Policy Consideration

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires a planning application to be determined in accordance with the Development Plan unless material planning considerations indicate otherwise. For the purposes of this application the development plan comprises the adopted Fenland Local Plan (2014) with the following relevant policies;

Fenland Local Plan (2014)

Fenland Local Plan, 2014 (FLP) – relevant policies

LP3 – Spatial Strategy, the Settlement Hierarchy and the Countryside

LP6 - Employment

LP9 - March (urban extensions)

LP14 – Flood Risk & Climate Change

LP15 – Highways & transport

LP16 – Delivering and Protecting High Quality Environments across the District

LP18 – Historic Environment

LP19 – Natural Environment

Supplementary Planning Documents/ Guidance:

- Delivering & Protecting High Quality Environments in Fenland SPD (2014)
- Cambridgeshire Flood & water SPD (2016)
- The Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) which includes the RECAP CCC Waste Management Design Guide SPD (2012)

March Neighbourhood Plan (adopted 2017)

TC1 - Primary Shopping Frontages (and out of town centre retail)

Full policy details are available using the following link:

<http://www.fenland.gov.uk/article/3334/Fenlands-Current-Development-Plan>

Assessment*Principle of development*

The site lies within developed footprint of March. Local Plan policy LP3 identifies March as a focus for growth. Policy LP9 sets out that the March trading Estate in which the site lies is identified for significant employment growth under the current Local Plan.

Policy LP6 sets out the strategic employment growth for the district and sets out that the Council will seek to retain for continued use high quality land and premises currently or last in use for B1/B2/B8 employment purposes, unless it can be demonstrated through a marketing exercise that there is no reasonable prospect for the site being used for these purposes.

The proposal would lead to the loss of a 'B' class use which in strict terms runs counter to policy LP6. However, having regard to the context of the area which has considerably evolved over the past 6 years with the introduction of a public house adjacent and fast food restaurants north, the B&M store and the extant permission for a retail park on the opposite side of the A141, the introduction of a further retail unit would not be out of character with the area. Notwithstanding this, the development would result in an employment site – most likely employing more staff than, say a B8 warehouse use would. I am also mindful that the site has been actively marketed for some time – further details of this would be useful to accompany any future planning application.

Therefore, having regard to this particular site and its location I am comfortable that the principle of development can be supported. This is however subject to demonstration through a retail impact assessment (RIA) that the development would not undermine the viability and vitality of March town centre as per LP6 and TC1 of the Local Plan and March neighbourhood plan respectively.

In this regard, we would expect the applicant to stand the cost of any assessment of an RIA which the LPA would commission. The preference would be to undertake this work at pre-application stage, to avoid any delays in the full application process and I would be happy to arrange this as part of this pre-application submission if preferred.

We have previously used PBA to undertake such work and subject to there being no conflict of interest, we would expect to use them for this development. Please advise if you any concerns over this approach.

Access & Highways

I note you have already commenced discussion with the County LHA and this appears to be progressing positively, subject to further evidence gathering and reporting on the potential impacts of the scheme on this highway network. The access I understand is currently a concern for the LHA and discussions in this regard are ongoing with them. We are wholly reliant on feedback from the LHA in respect of the suitability of the development. Our in-house transport team mainly focus on the strategic transport network and have not raised any significant concerns in this regard, reverting to the County LHA for more localised matters. The County LHA will also have regard to the recent March Area transport Study work that has been undertaken and how this feeds into this scheme.

Flood Risk & Drainage

The site lies in flood zone 1. As such, I have no concerns to raise in this regard subject to a satisfactory flood risk assessment and drainage strategy accompanying any application. Whilst you have engaged with the County Council you may wish also to liaise with their Lead Local Flood Authority to understand their requirements and opportunities for surface water disposal prior to the submission of an application. It would also be useful for you to review the [Cambridgeshire Flood and Water SPD](#) which sets out the Council's expectations on flood risk and surface water management and which has been produced in conjunction with neighbouring authorities including the County Council. You may also wish to engage early in the process with the [Middle Level Commissioners](#) as the local internal drainage board in respect of disposal options.

Environmental Health

The Environmental Health has advised that they are unlikely to have any objections to the proposal in the event that a formal application is submitted.

Design

I have no concerns or recommendations on the design and layout of the store as proposed. The outcome of discussions with the LHA may necessitate an amended layout and I'd be happy to review and provide further comments on this if required. My only comments at this time would be in respect of any potential signage, particularly illuminated signage and the impacts this may have on local biodiversity (see below).

Archaeology

Having regard to our site constraints review, it suggests that Bronze Age implements have been previously discovered in the vicinity. Whilst I appreciate that the site is mostly hard-landscaped and the likelihood of any heritage assets still existing within the site being slim, you may wish to liaise with the County Council's Archaeology team to discuss their likely requirements for this development as it is possible that the County Council's Archaeological team may wish to secure a programme of investigation (undertaken by the applicant) should a planning application be advanced.

Ecology & Biodiversity

The site itself appears relatively sterile and hard landscaped. I am mindful of the prolonged vacancy of some of the buildings however which may have presented opportunities for nesting birds which are protected. I also note the presence of trees along the perimeter of the site. Furthermore, you may wish to review the findings of a recent ecological survey undertaken at the proposed 'McDonald's' site opposite – application ref: F/YR19/1093/F and the comments received from our Wildlife Officer in respect of potential

for foraging Bats, Amphibians, Badgers and Water Voles. This may inform your approach to biodiversity and ecology for this scheme including identifying opportunities to achieve biodiversity net gain through the development as per paragraph 170 of the NPPF.

Validation requirements

You have provided a list of documents and plans you intend to submit with a future application and I have reviewed these alongside national and local validation requirements. These are as follows;

- *Full drawing pack – site location plan, site plan, existing & proposed floor / roof plans, elevations, sections and CGI*
- *Design and Access Statement*
- *Planning, Economic and Retail Statement (incl. sequential and RIA)*
- *Employment Marketing Evidence and Analysis*
- *Drainage Strategy*
- *Tree Survey and Arboricultural Implications Report*
- *Phase 1 Site Investigation*
- *Sustainability Statement*
- *Ecology Assessment & Biodiversity Checklist*
- *Noise Assessment*
- *Landscape Scheme*
- *Lighting Assessment*
- *Statement of Community Involvement*
- *Transport Assessment & Travel Plan*

I can confirm that the above would be acceptable but we would also require a flood risk assessment given that the scheme proposes development with a floor area exceeding 1000m² (major development) in order to validate an application.

Conclusions

I consider that, subject to adequate demonstration through an appropriate RIA that the scheme would not compromise the vitality and viability of the town centre and a satisfactory resolution to highways and transport impacts the proposed scheme is likely to receive a favourable recommendation from officers providing consideration is given to the other points raised. I would be happy to continue engaging with you on this scheme as it progresses.

This pre-application advice is valid for 1 year. Advice is provided in good faith and whilst all reasonable care has been taken, should you submit an application there may be occasions where new information comes to light (particularly from external consultees) which means we are unable to maintain the advice provided.

My comments are an expression of opinion only and are made without prejudice to the determination of any subsequent application that may be made. Should you wish to submit an application, please see enclosed the list of national and local validation requirements. I trust this advice is of assistance.

5
6 April 2020
Aldi Stores K. Clarke
Our ref: 20/0005/PREAPP

Yours sincerely

G.T

Gavin Taylor
Senior Development Management Officer

General Data Protection regulations 2018

To provide you with our services we need to record personal information, such as your name and address.
This information will be kept securely and only accessed by approved staff.

Fenland District Council • Fenland Hall • County Road • March • Cambridgeshire • PE15 8NQ
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Appendix 4 – Background to Aldi



Background to ALDI



Contents

1. Background – ALDI Stores Limited	2
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No part of this report should be copied or reproduced without the prior written consent of author.

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Bristol

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Bristol BS1 5EH
T: 0117 905 5346

Report Author: Charlotte Boyes

Ref: ASL Background 2017

1. Background – ALDI Stores Limited

1.1. This Statement has been prepared by Planning Potential to provide a general background to ALDI Stores Ltd.

Who is ALDI?

- 1.2. ALDI – an abbreviation of Albrecht Discount – is one of the world's leading grocery retailers and are represented in Europe, the USA and Australia. ALDI first entered the UK market in 1990 and currently have over 700 trading stores nationwide. ALDI are also represented in the Republic of Ireland.
- 1.3. The Company's philosophy is simple - providing high quality products at discounted prices and within a pleasant shopping environment. ALDI does not necessarily sell goods at the lowest possible prices, but rather retail the highest quality goods at the lowest possible prices. Discounted prices are achieved through bulk buying and economies of scale, specialisation in the number of lines offered and, moreover, maximising efficiency within the operation of the stores. Prices are not lower because the quality of products is less.
- 1.4. Indeed, ALDI regularly receive widespread recognition of the quality of the brand. ALDI were recently awarded the prestigious Which? Best Supermarket award in 2012, 2013 and 2015, with many own brand products regularly winning blind taste tests. ALDI have also only recently just won The Grocer of the Year 2016 in the Grocer Gold Awards, which is the 4th time this award has been won since 2009.
- 1.5. ALDI have a 5-year partnership with The Teenage Cancer Trust which will aim to raise an amazing £5 million to support the Trust's ambitious goal of making sure no young person should face cancer alone.

ALDI Trading Policy

- 1.6. ALDI's function is as a supermarket, primarily acting as a 'weekly' food shop destination, albeit also providing a degree of top-up / one of purchases, such as weekly 'specials'. The business model is recognised by the Competition Commission as a 'limited assortment discounter' (LAD), or 'deep discounter'. The introduction of an ALDI store also helps contribute to the overall range of convenience facilities within their anticipated catchments by providing a discount food store as a further element of choice. Similar retailers within the sector include Lidl.
- 1.7. ALDI Stores are modest scale supermarkets, providing a limited product range, which is considerably limited in comparison to larger format supermarkets, which can be anything up to 3 times larger and carry up to 30 times the range of goods typically found in a neighbourhood ALDI store. ALDI do not stock numerous types of one product (e.g. pet food, bread ranges etc.), but rather one line of a given product range.
- 1.8. This limited selection of core goods includes:
- pre-packed seasonal fruit and vegetable lines;
 - general tinned, bottled and pre-packed groceries;
 - frozen and chilled goods;
 - beers, wines and spirits;
 - pre-packed bread, morning goods and cakes;
 - A limited everyday range of non-food household items.
- 1.9. ALDI sell only a limited range of branded goods, which are only sold when, in ALDI's opinion, the branded product offer cannot be 'bettered'. Local and regional sourcing of products, particularly for fresh produce and

bakery goods, is an important element within the range. ALDI stores do not contain specialist concession counters, such as butcher, pharmacy, post office, delicatessen, fishmonger, photo processing etc.

- 1.10. This is an important distinction with ALDI and crucial to understanding how stores operate. Unlike the larger formats, the reality is ALDI is not a 'one-stop-shop', meaning customers also visit other shops and services to complete their shopping trip, for example when purchasing a branded product or should they wish to visit a specialist service, such as a butcher.
- 1.11. Further, stores have only a limited amount of non-food floor space, which is mainly used for changing weekly specials. This is also an important trading characteristic, as this floor space will not always be used for retailing one particular product throughout the year, but rather one-off special offers that vary from week to week and season to season and again this restricts potential direct competition with specialist local retailers. This also compares to larger supermarkets that can have anything between 30%-50% non-food floor space, which is often occupied by permanent product range. ALDI stores do not include petrol filling stations.
- 1.12. In real terms, this means that ALDI complements, rather than competes, with existing local traders and generates considerable propensity for linked trips and associated spin-off trade. Store opening hours are also more limited than traditional convenience shops/newsagents, which further limits direct competition with such outlets.
- 1.13. In this way, the introduction of an ALDI offers considerable benefits to the area a new store will serve increasing spin-off trade, as well as considerable physical and economic regeneration. Stores will also not only increase main food shopping choice in a locality but, by providing a facility which is highly accessible to the surrounding community, help address key objectives of minimising social exclusion.

Merchandising Layout and Store Equipment

- 1.14. Crucial to this is a tried and tested store format, which the company has developed to enable goods to be handled, displayed and sold efficiently, thus enabling stores to effectively compete and provide the award-winning offer. Store layouts are eminently practical and reflect the Company philosophy of offering unrivalled value for money through cost effective management. There is no unnecessary expenditure on elaborate shop fittings with resultant savings being reflected in low prices.
- 1.15. Merchandise is sensibly displayed in specially designed cases to eliminate stocking time and allow practical and efficient re-stocking. ALDI make enormous efficiency gains in this area that are in turn passed directly to the customer. Goods themselves are unloaded directly into the store via a dock leveller and can be transferred direct to the shop floor to go on display
- 1.16. The internal store layout and operation has been designed to be efficient and practical for use by customers; these matters are routinely reviewed and monitored and adjustments made to the model as required.
- 1.17. Features included to facilitate this are:
 - Long till conveyors that hold a customer's full shop to allow goods to be unloaded, scanned and then packed quickly by customers;
 - Level store access, automatic entrance doors, and wide aisles and checkouts for easy access by all;
 - Gondolas and shelving that allow goods to be easily reached; and
- 1.18. The design and layout of new ALDI stores also complies with the requirements of the Disability Discrimination Act and ensure they are accessible to all.
- 1.19. Retail is, of course, a constantly evolving and dynamic sector and ALDI are committed to improving operations and shopping experience to meet the demands and expectations of customers.

Customer Experience

- 1.20. Store managers and assistants are carefully trained to give fast and courteous service at the checkouts and are multi-tasked to carry out stock replenishment and other duties.
- 1.21. A range of trolley sizes and types are provided offering customers a choice of trolley according to their likely size of shop. Trolleys are available on a £1 deposit arrangement, which ensures they are returned to the store rather than being abandoned and forming a nuisance. This also reduces the amount of lost/stolen trolleys. This is a further cost saving passed on to the customer to help further achieve discounted prices.
- 1.22. Carrier bags are available for customers to buy at a small price. The payment regime seeks to minimise the wasted use of carrier bags.

Jobs

- 1.23. Stores typical employ 40-50 staff, which ALDI actively seek to recruit from the local area. ALDI are industry leaders in terms of pay and offer exceptional training opportunities.
- 1.24. In summary, an ALDI store creates a highly beneficial and popular facility, a sentiment reflected in numerous examples throughout the UK and affirmed in both consumer groups' recognition of the brand and its increasing popularity with shoppers everywhere.

Appendix 5 – Planning Policy Review

Appendix 5 - Planning Policy Review



1. Planning Policy Context

1.1. The planning policy framework against which the application proposals should be assessed includes:

- Fenland Local Plan (2014)
- March Neighbourhood Plan (2017)

1.2. The following comprise material considerations in assessing this development:

- National Planning Policy Framework (NPPF) (2019)
- Delivery & Protecting High Quality Environments in Fenland SPD (2014)

2. Fenland Local Plan (2014)

2.1. The Fenland Local Plan (2014) was adopted in May 2014.

Sustainable Development

- 2.2. **Policy LP1 'A Presumption in Favour of Sustainable Development'** - states Fenland's desire to deliver sustainable growth, and when considering development proposals, they will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. They will always work proactively with applicants to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in Fenland.
- 2.3. **Policy LP9 'March'** - emphasises March as a focus for housing, employment and retail growth. The policy details broad locations for growth and strategic allocations within the town, including the 'West March Strategic Allocation', expecting the area to be predominantly residential (around 2,000 new dwellings) with potentially some business provision gaining access from the A141. The broad concept plan for the area should show how development will relate acceptably to the strategic and local highway network, including the town centre, as well as indicating direct sustainable transport links to the north of the town and the town centre.
- 2.4. **Policy LP9** specifically covers 'March Trading Estate' as a broad location for growth. Subject to flood risk, highway and amenity issues, and other relevant policies in the plan being satisfactorily addresses, it is expected that development in this area will be predominately or entirely related to business uses.

Retail Considerations

- 2.5. **Policy LP6 'Employment, Tourism, Community Facilities and Retail'** - states that the Council will embrace a strong 'town centre first' message when considering the most appropriate locations for retail and leisure development, and aims to support, and regenerate where necessary, existing Town, District and Local Centres to ensure they continue to cater for the retail needs of communities that they serve.
- 2.6. Future retail development in Fenland will be directed to the Primary Shopping Frontages (PSF) and the Primary Shopping Area (PSA) and then Town/District centre locations. Thereafter proposals will need to follow the sequential approach set out in NPPF
- 2.7. Policy LP6 'Employment, Tourism, Community Facilities and Retail' requires retail development located outside of the town centres, and of 500sq m gross floorspace or more, to undertake an impact assessment (as defined in the NPPF) to ensure the vitality and viability of defined centres are protected and/or enhanced.

Employment Allocation

- 2.8. **Policy LP6 'Employment, Tourism, Community Facilities and Retail'** - states that the Council will seek to retain for continued use high quality land and premises currently or last in use for B1/B2/B8 employment purposes.

Highways and Accessibility

- 2.9. **Policy LP15 'Facilitating the Creation of a More Sustainable Transport Network in Fenland'** - requires development to be located and designed so that it can maximise accessibility and help to increase the use of non-car modes.
- 2.10. **Policy LP15 'Facilitating the Creation of a More Sustainable Transport Network in Fenland'** - requires development which is likely to result in significant transport implications to be accompanied by a Transport Assessment and Travel Plan. The coverage and detail of this should reflect the scale of development and the extent of the transport implications

Parking

- 2.11. **Policy LP15 'Facilitating the Creation of a More Sustainable Transport Network in Fenland'** - requires development schemes to provide well designed car and cycle parking appropriate to the amount of development proposed, ensuring that all new development meets the Council's defined parking standards.

Design

- 2.12. **Policy LP16 'Delivering and Protecting High Quality Environments across the District'** - states that proposals for all new development will only be permitted where it meets the following relevant criteria:
- Makes a positive contribution to the local distinctiveness and character of the area, enhances its local setting, responds to and improves the character of the local built environment, provides resilience to climate change, reinforces local identity and does not adversely impact, either in design or scale terms, on the street scene, settlement pattern or the landscape character of the surrounding area
 - Does not result in any unreasonable constraint(s) or threaten the operation and viability of existing nearby or adjoining businesses or employment sites by introducing "sensitive" developments.

Sustainability and Energy Efficiency

- 2.13. **Policy LP14 'Responding to Climate Change and Managing the Risk of Flooding in Fenland'** - states that the Council will expect all development of over 100sq m non residential to explicitly demonstrate what reasonable contribution the development will make towards minimising resource consumption. All developments are encouraged to incorporate on site renewable and/or decentralised renewable or low carbon energy sources, water saving measures and measures to help the development withstand the longer-term impacts of climate change.
- 2.14. **Policy LP14** supports renewable energy proposals in the context of sustainable development and climate change.

Amenity Considerations

- 2.15. **Policy LP16 'Delivering and Protecting High Quality Environments across the District'** - states that proposals for new development will only be permitted where it does not adversely impact on the amenity of neighbouring users such as noise, light pollution, loss of privacy and loss of light.

Flooding and Drainage

- 2.16. **Policy LP16 'Delivering and Protecting High Quality Environments across the District'** - requires relevant developments to include a drainage strategy to demonstrate that suitable consideration has been given to surface water drainage and appropriate arrangements for attenuating surface water run-off can be accommodated within the site. The most appropriate SuDS techniques should be used depending on the particular circumstances of the site and area. Consideration should be given to the facility to be used, what is trying to be achieved, and the nature of water level management in the area.
- 2.17. **Policy LP16** states that proposals for new development will only be permitted where it provides well designed hard and soft landscaping incorporating sustainable drainage systems as appropriate. Development will also only be permitted where the site is suitable for its proposed use with layout and drainage taking account of ground conditions, and have with no significant impacts on future users, groundwater or surface waters.

3. March Neighbourhood Plan (2017)

- 3.1. The March Neighbourhood Plan 2015-2030 was adopted in November 2017.

Retail Considerations

- 3.2. **Policy TC1 'Primary Shopping Frontages'** - requires new retail development located outside of the Town Centre boundary, in excess of 500sq m gross floorspace, to demonstrate by way of an impact assessment that it will not harm the vitality and viability of the Town Centre.
- 3.3. **Policy TC2 'Regeneration Sites'**- identifies three sites where it is felt that there is an opportunity to improve the physical appearance of the town centre and enhance the quality of the environment:
- Site 1 - Land to the west of the High Street
 - Site 2 - Land to the south of Station Road
 - Site 3 - Land to the north of Centenary Church

4. National Planning Policy Framework (2019)

- 4.1. The National Planning Policy Framework (NPPF) rationalises all government planning policy guidance into a single document.

Sustainable Development

- 4.2. Para. 7 of the NPPF clearly sets out the key purpose that underpins the planning system; sustainable development. In this respect, the objective of sustainable development is defined as, "... *meeting the needs of the present without compromising the ability of future generations to meet their own needs*".
- 4.3. Para. 80 of the NPPF supports economic growth, whereby "*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*".

Town Centre and Retail Uses

- 4.4. Town Centre and Retail Uses are considered at paras. 85-90, which identify existing retail centres as the primary focus for new retail uses.
- 4.5. Where proposals do not fall within a centre, applicants are required to demonstrate compliance with the sequential approach having regard to the considerations of availability and suitability. Applicants are no longer required to demonstrate a 'need' for development, although in instances may be required to consider potential impacts of development.
- 4.6. The NPPG confirms that, where an assessment of impact is required, this should be, "... *undertaken in a proportionate and locally appropriate way*", as well as following the 'guiding principle' of a 'like-for-like' basis. Only when a proposal would result in "significant adverse impacts" should planning permission be refused.

Transport

- 4.7. Para. 102-111 consider transportation and accessibility and reinforce the objectives of local policy to reduce the need to travel and promote sustainable patterns of development. A pragmatic approach is advocated including that different policies and measures be required in different communities.
- 4.8. All developments that will generate significant amounts of movement should be accompanied by a Transport Assessment and Travel Plan so that likely impacts of the proposal can be assessed, and measures to improve accessibility and safety can be identified (para. 111).
- 4.9. Development should only be refused where the, "*residual cumulative impacts on the road network would be severe*" (para. 109).

Design

- 4.10. Para. 124-132 consider the importance of achieving well-designed places and reinforce the objectives of local policy to require development to makes a positive contribution to the local distinctiveness and character of the area.
- 4.11. Para. 127 requires planning decisions to ensure that development, "*will function well and add to the overall quality of the area ... are visually attractive as a result of good architecture, layout and appropriate and effective landscaping ... and are sympathetic to local character and history, including the surrounding built environment and landscape setting*".

Sustainability and Energy

4.12. Para. 151 requires Local Planning Authorities to expect new development to:

- comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable
- take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption

Flood Risk

4.13. Para. 149 states that “Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk...” and further continues that “new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change”. (para. 149).

5. Delivery & Protecting High Quality Environments in Fenland SPD (2014)

5.1. Policy DM3 ‘Making a Positive Contribution to Local Distinctiveness and Character of the Area’ requires all new development to achieve high design quality and as a minimum ensure that:

- the development provides high quality and attractive public spaces
- the character of the landscape, local built environment and settlement pattern inform the layout, density, proportions, scale, orientation, materials and features (including boundary treatment) of the proposed development, which should aim to improve and reinforce positive features of local identity
- proposals are robust to withstand and adapt to the predicted impacts of climate change including measures to manage the risk of flooding and subsidence.

Appendix 6 – Retail Impact Tables

Table 1: Population & Convenience Goods Expenditure

	March Catchment Zone 2
2021	
Population	23,990
Expenditure per Head (£)	£2,095
Available Expenditure (£m)	£50.27
2024	
Population	24,571
Expenditure per Head (£)	£2,127
Available Expenditure (£m)	£52.26
Expenditure Growth (£m) 2021-2024	£1.99
March Allocated Housing Growth 2024 - 3,100 new homes (£m)	£14.99

Notes.

2015 Prices

- (1) Population derived from Table 1, Appendix 2, Contour Planning Retail Statement (December 2017) submitted in support of application 18/0566/F.
- (2) 0.8% per annum population increase estimate derived from Table 1, Appendix 2, Contour Planning Retail Statement (December 2017) submitted in support of application 18/0566/F.
- (3) Expenditure per head derived from Table 2b, Appendix 2, Contour Planning Retail Statement (December 2017) submitted in support of application 18/0566/F.
- (4) Annual 0.5% annual growth rate added as derived from Table 2b, Appendix 2, Contour Planning Retail Statement (December 2017) submitted in support of application 18/0566/F.
- (5) 3,100 new homes allocated as Strategic Allocations for March, Policy LP9 of adopted Fenland Local Plan (2014).
- (6) Average household of 2.27 obtained from Cambridgeshire CC's population Estimates, Mid-2011 to Mid-2018. 3,100 new homes x 2.27 average household = 7,047 of new residents.
- (7) Expenditure associated with planned 3,100 new homes shown to illustrate further growth, but not used with impact assessments carried out by Contour Planning or PP.

Table 2: 2021 Convenience Market Shares & Store Turnovers

Location	March Catchment (Zone 2) Market Share		Inflow		Total Store Turnover 2021 (£m)	2026 Total Store Turnover (£m)	Convenience Sales Area (sqm)	Company Average Sales Density 2021 (£/sqm)	Benchmark Turnover 2021 (£m)	Levels of Over / Under Trading 2021 (£m)
	Market Share (%)	2021 Total (£m)	Inflow to Zone 2 (%)	2021 (£m)						
March Town Centre										
Sainsbury's, Mill View	21.8%	10.97	36.6%	6.33	17.30	17.98	1,301	10,762	14.00	3.30
Lidl, Dartford Road	14.7%	7.40	32.4%	3.55	10.96	11.39	855	9,503	8.13	2.83
Tesco Express, Broad Street	0.7%	0.37	59.3%	0.55	0.92	0.96	150	11,290	1.69	-0.77
Iceland, High Street	3.0%	1.51	13.9%	0.24	1.75	1.82	525	6,994	3.67	-1.92
Other	2.6%	1.32	0.0%	0.00	1.32	1.37	-	-	-	-
Sub-Total	42.9%	21.57	-	10.67	32.24	33.52	-	-	-	-
Other March										
Tesco, Hostmoor Avenue	43.9%	22.07	47.1%	19.63	41.69	43.34	2,535	11,290	28.62	13.07
One-Stop, Maple Grove	0.7%	0.37	0.0%	0.00	0.37	0.39	-	-	-	-
Coop, Badgeney Road	2.6%	1.32	22.2%	0.37	1.69	1.76	175	8,824	1.54	0.15
Sub-Total	47.3%	23.76	-	20.00	43.76	45.49	-	-	-	-
Zone 2 TOTAL	90.2%	45.33		30.67	76.00	79.01	-	-	-	-
Others (Outside of Zone 2)										
Aldi, Wisbech	2.0%	1.01								
Morrisons, Wisbech	1.9%	0.94								
Aldi, Chatteris	0.6%	0.30								
Jacks, Chatteris	0.4%	0.21								
Other	4.9%	2.47								
Other Sub-Total	9.8%	4.94								
TOTAL	100%	50.27	-	30.67	76.00	79.01				

Notes.

2015 Prices

(1) Convenience Market share figures derived from 2015 NEMs Household Survey and Appendix 2, Table 8 of Contour Planning Retail Statement (December 2017) submitted in support of application 18/0566/F.

(2) Zone 2 available convenience expenditure derived from PP Table 1.

(3) Inflow figures into Zone 2 derived from Appendix 2, Table 8 of Contour Planning Retail Statement (December 2017) submitted in support of application 18/0566/F.

(4) Store convenience floorspaces obtained from planning history search and confirmed on site visit.

(5) Company average sales densities obtained from Mintel UK Retail Rankings - April 2020. Converted back to 2015 price base with store store efficiency rates added as per Figure 4a, Experian Retail Planner Briefing Note 18 (October 2020).

Table 3: Turnover of Proposed Development

Proposed Development	Floorspace (sqm)	Sales Area (sqm)		Sales Density 2021 (£/sqm)		Benchmark Turnover 2021 (£m)		Benchmark Turnover 2024 (£m)	
	net	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison	Convenience	Comparison
ALDI, Hostmoor Avenue, March	1,315	1,052	263	£11,226	£8,775	£11.81	£2.31	£12.75	£2.73

Notes.

2015 Prices

(1) Aldi Sales Density based on Mintel Retail Ranking 2020 and converted to reflect actual Aldi floorspace figures, then converted back to 2015 price base with store store efficiency rates added as per Figure 4a, Experian Retail Planner Briefing Note 18 (October 2020).

(2) Aldi Sales Area Ratio based on 80% convenience / 20% comparison.

Table 4: 2024 Convenience Market Shares & Store Turnovers (Scenario 1 - No Development)

Location	2024 Total Turnover Zone 2 (£m)	Total Store Turnover 2024 (£m)	Convenience Sales Area (sqm)	Company Average Sales Density 2024 (£/sqm)	Benchmark Turnover 2024 (£m)	Levels of Over / Under Trading 2024 (£m)
<u>March Town Centre</u>						
Sainsbury's, Mill View	11.40	17.98	1,301	11,623	15.12	2.87
Lidl, Dartford Road	7.70	11.39	855	10,264	8.78	2.61
Tesco Express, Broad Street	0.39	0.96	150	12,194	1.83	-0.87
Iceland, High Street	1.57	1.82	525	7,553	3.97	-2.14
Other	1.37	1.37	-	-	-	-
Sub-Total	22.43	33.52	-	-	-	-
<u>Other March</u>						
Tesco, Hostmoor Avenue	22.94	43.34	2,535	12,194	30.91	12.43
One-Stop, Maple Grove	0.39	0.39	-	-	-	-
Coop, Badgeney Road	1.37	1.76	175	9,530	1.67	0.09
Sub-Total	24.70	45.49	-	-	-	-
Zone 2 TOTAL	47.12	79.01	-	-	-	-
Others (Outside of Zone 2)						
Aldi, Wisbech	1.05					
Morrisons, Wisbech	0.98					
Aldi, Chatteris	0.32					
Jacks, Chatteris	0.22					
Other	2.57					
Other Sub-Total	5.14					
TOTAL	52.26	79.01				

Notes.

2015 Prices

(1) Zone 2 market shares derived from Table 2. Total Zone 2 convenience expenditure for 2024 derived from Table 1.

(2) Store convenience sales areas derived from Table 2.

(3) Company average sales densities obtained from Mintel UK Retail Rankings - April 2020. Converted back to 2015 price base with store store efficiency rates added as per Figure 4a, Experian Retail Planner Breifing Note 18 (October 2020).

Table 5: Westry Retail Park Solus Convenience Impact (Scenario 2)

Location	2024 Total Turnover Zone 2 (£m)	Total Store Turnover 2024 (£m)	Solus Impact of Westry RP			
			Proportion of Westry RP Turnover (%)	Diversion to Westry RP (£m)	Post-Impact Turnover (£m)	Impact of Westry RP (%)
<u>March Town Centre</u>						
Sainsbury's, Mill View	11.40	17.98	15.18%	1.57	16.41	8.7
Lidl, Dartford Road	7.70	11.39	8.27%	0.86	10.53	7.5
Tesco Express, Broad Street	0.39	0.96	0.21%	0.02	0.00	2.3
Iceland, High Street	1.57	1.82	0.21%	0.02	1.80	1.2
Other	1.37	1.37	0.21%	0.02	1.35	1.6
Sub-Total	22.43	33.52	24.08%	2.50	30.09	7.4
<u>Other March</u>						
Tesco, Hostmoor Avenue	22.94	43.34	31.62%	3.28	40.07	7.6
One-Stop, Maple Grove	0.39	0.39	0.21%	0.02	0.00	5.6
Coop, Badgeney Road	1.37	1.76	0.21%	0.02	1.74	1.2
Sub-Total	24.70	45.49	32.04%	3.32	41.81	
Zone 2 TOTAL	47.12	79.01	56.12%	5.81		
<u>Others (Outside of Zone 2)</u>						
Aldi, Wisbech	1.05		0.94%	0.10		
Morrisons, Wisbech	0.98		1.26%	0.13		
Aldi, Chatteris	0.32		9.53%	0.99		
Jacks, Chatteris	0.22		9.53%	0.99		
Other	2.57		22.62%	2.34		
Other Total	5.14		43.88%	4.55		
TOTAL	52.26	79.01	100.00%	10.36		

Notes.

(1) 2024 Turnover figures derived from PP Table 3

(2) Westry Retail Park estimated diversion levels derived from Appendix 2, Table 11 of Contour Planning Retail Statement (December 2017) submitted in support of application 18/0566/F as agreed by Fenland's independent consultant July 2019.

(3) Westry Retail Park estimated convenience turnover at 2020 derived from Appendix 2, Table 11 of Contour Planning Retail Statement (December 2017) with store store efficiency rates added as per Figure 4a, Experian Retail Planner Breifing Note 18 (October 2020).

Table 6: Aldi Solus Impact (Scenario 3)

Location	2024 Total Turnover Zone 2 (£m)	Total Store Turnover 2024 (£m)	Solus Impact of Aldi			
			Proportion of Aldi Turnover (%)	Diversion to Aldi (£m)	Post-Impact Turnover (£m)	Impact of Aldi (%)
<u>March Town Centre</u>						
Sainsbury's, Mill View	11.40	17.98	10.0%	1.28	16.71	7.1
Lidl, Dartford Road	7.70	11.39	20.0%	2.55	8.84	22.4
Tesco Express, Broad Street	0.39	0.96	0.0%	0.00	0.00	0.0
Iceland, High Street	1.57	1.82	1.5%	0.19	1.63	10.5
Other	1.37	1.37	1.0%	0.13	1.24	9.3
Sub-Total	22.43	33.52	32.5%	4.15	28.42	12.4
<u>Other March</u>						
Tesco, Hostmoor Avenue	22.94	43.34	45.0%	5.74	37.61	13.2
One-Stop, Maple Grove	0.39	0.39	0.0%	0.00	0.00	0.0
Coop, Badgeney Road	1.37	1.76	0.0%	0.00	1.76	0.0
Sub-Total	24.70	45.49	45.0%	5.74	39.36	
Zone 2 TOTAL	47.12	79.01	77.5%	9.88	67.78	
<u>Others (Outside of Zone 2)</u>						
Aldi, Wisbech	1.05					
Morrisons, Wisbech	0.98					
Aldi, Chatteris	0.32					
Jacks, Chatteris	0.22					
Other	2.57					
Other Total	5.14		7.5%	0.96		
Inflow			15.0%	1.91		
TOTAL	52.26	79.01	100.0%	12.75		

Notes.

(1) 2024 Turnover figures derived from Table 4

(2) Trade diversion to proposed Aldi based on Planning Potential Judgement

(3) Aldi turnover derived from Table 3

Table 7: Combined Convenience Impact (Scenario 4)

Location	2024 Total Turnover Zone 2 (£m)	Total Store Turnover 2024 (£m)	Combined Impact				
			Diversion to Westry RP (£m)	Diversion to Aldi (£m)	Combined Diversion (£m)	Post-Impact Turnover (£m)	Combined Impact (%)
<u>March Town Centre</u>							
Sainsbury's, Mill View	11.40	17.98	1.57	1.28	2.85	15.13	15.8
Lidl, Dartford Road	7.70	11.39	0.86	2.55	3.41	7.98	29.9
Tesco Express, Broad Street	0.39	0.96	0.02	0.00	0.02	0.94	2.3
Iceland, High Street	1.57	1.82	0.02	0.19	0.21	1.61	11.7
Other	1.37	1.37	0.02	0.13	0.15	1.22	10.9
<i>Sub-Total</i>	22.43	33.52	2.50	4.15	6.64	26.88	19.8
<u>Other March</u>							
Tesco, Hostmoor Avenue	22.94	43.34	3.28	5.74	9.02	34.33	20.8
One-Stop, Maple Grove	0.39	0.39	0.02	0.00	0.02	0.37	5.6
Coop, Badgeney Road	1.37	1.76	0.02	0.00	0.02	1.74	1.2
<i>Sub-Total</i>	24.70	45.49	3.32	5.74	9.06	36.43	-
<u>Zone 2 TOTAL</u>	47.12	79.01	5.81	9.88	15.70	-	-
<u>Others (Outside of Zone 2)</u>	5.14	-	4.55	0.96	5.50	-	-
<u>Inflow</u>	-	-	-	1.91	-	-	-
TOTAL	52.26	79.01	10.36	12.75	23.11		

Notes.

(1) Figures derived from tables 4, 5 and 6.

Table 8: Overall March Town Centre Impact

Location	2024 Turnover (£m)	Westry RP Diversion (£m)	Westry Park Impact (%)	Aldi Diversion (£m)	Aldi Impact (%)	Combined Diversion (£m)	Combined Impact (%)
<u>March Town Centre</u>							
Convenience	33.5	2.5	7.4	4.1	12.4	6.6	19.8
Comparison	46.9	3.6	7.7	0.9	1.9	4.5	9.6
Total	80.4	6.1	7.6	5.0	6.3	11.1	13.8

Notes.

(1) Convenience figures derived from Table 7.

(2) Town centre and Westry RP comparison goods turnovers for 2020 derived from Appendix 2, Table 17 of Contour Planning Retail Statement (December 2017) submitted in support of application 18/0566/F.

(3) Comparison floorspace efficiency rates added as per Figure 4a, Experian Retail Planner Briefing Note 18 (October 2020) to achieve 2024 figures.

(4) Aldi comparison diversion figure derived from store comparison turnover figure in 2024 at Table 3 (£4.1m) and Aldi town centre diversion figure at Table 6 (32.5%)

Appendix 7 – March Town Centre Health Check

March Town Centre Health Check



- 1.1. This town centre health check is based on information that is available within the public domain in terms of background information and studies and have been supplemented by a site visits undertaken by Planning Potential in February 2021. It is recognised that at this time the true picture of the vitality and viability of the centre may not have been observed as lockdown restrictions have been in place. We reserve the right to update this health check should lockdown restriction ease allowing further assesement.
- 1.2. A list of criteria to be used to assess the health of a centre is not provided in the National Planning Policy Framework (NPPF), however indicators for such an assessment can be found in the Government's Planning Practice Guidance (PPG). Further, the PPG advises that to accurately judge the health of a centre in the context of its performance over time these indicators should be regularly monitored.
- 1.3. A number of sources has been drawn upon when preparing this assessment, including the latest Experian Goad Ltd data for March town centre collated in October 2020.

Introduction

- 1.4. The town of March is an historic market town relatively well connected by road and benefits from a railway station with direct links to Cambridge and East Anglia, Peterborough and the Midlands. The 2014 Local Plan described March '*as a relatively healthy town centre which has an historic urban form and attractive riverside setting*'. The town is centrally located in the Fenland district and is the second largest town after Wisbech.
- 1.5. The town centre for the purpose of this Health Check is that defined by Experian Goad Ltd. Whilst the Goad plan for the town is largely reflective of area defined by the town centre boundary in the adopted Local Plan, it is noted that the Lidl store and its surrounds are identified as being outside of the town centre in terms of policy.
- 1.6. March town centre contains very little representation from national multiple retailers, but has a strong service offer and a wide range of independent businesses.

Diversity of Uses

- 1.7. The National Planning Practice Guidance (NPPG) recognises that diversity of uses within a centre makes an important contribution to overall vitality and viability, ensuring that town centres are attractive destinations throughout the day and evening.
- 1.8. Figure 1 below utilises the latest Experian Goad Ltd data provides a breakdown of the diversity of uses in March town centre at October 2020, set against the national average.

Figure 1 March Town Centre Diversity of Uses

	No. of Units Oct 2020	% of Units Oct 2020	UK Average % Units
Convenience	14	7.9	9.1
Comparison	35	19.8	27.6
Retail Services	38	21.5	16.6
Professional Services	17	9.6	9.3
Leisure Services	41	23.2	24.5
Vacant	32	18.1	13.7

TOTAL	177	-	-
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Source: Experian Goad Ltd

Convenience Retail

- 1.9. The current number of convenience units (14 no.) is lower than the UK national average, but the town centre is relatively well represented with a range of different convenience retailers.
- 1.10. The town centre is anchored by a Sainsbury's supermarket, with Lidl representing an edge of centre location outside of the defined town centre boundary and primary shopping area. The centre is also served by several smaller stores in the form of Tesco Express, Iceland and a Heron Food. The town has also retained a local butchers, bakers and newsagent as well as several smaller convenience offerings, including a health food shop.
- 1.11. The Sainsbury's is the largest single retail unit in the town centre and provides the main retail anchor. The store has a net area of 1,858 sqm and sells a wider of convenience and comparison goods. When visited in February 2021 the store was trading well despite existing competition from the edge of centre Lidl and out of centre Tesco store.

Comparison Retail

- 1.12. March town centre has a relatively small comparison retail offer and these are mainly independent businesses, with only a limited range of national multiple retailers. The largest sector representation of multiple retailers are charity shops. Clarks, M&Co, WH Smith, Boots, Superdrug and Specsavers are also represented.

Vacancies

- 1.13. Vacancy rates provide a useful indicator of the relative health of a town centre and should be taken into account when assessing vitality and viability of a town centre. It should be noted that a small level of vacant units is considered appropriate as it allows for natural change in retailers and availability of floorspace for new entries.
- 1.14. The latest Experian Goad data shows there were 32 vacant units in October 2020 which is above the current national average. However when vacant floorspace is considered March is more consistent with the national average. Approximately 3,700 sqm of floorspace was identified as being vacant, which constitutes around 12% of town centre floorspace. This is a strong indicator of the relative good health of March town centre during the current time.
- 1.15. The largest vacant units observed in October 2020 were:
- 6 Dartford Road (circa 255 sqm)
 - City Road – former leisure use (circa 280 sqm)

Pedestrian Flows

- 1.16. During Planning Potential's site visit to March in February 2021, the footfall and pedestrian activity across the town centre was observed. Despite lockdown restrictions, pedestrian flows were relatively busy, being the greatest at the High Street and Market Place and along Broad Street.
- 1.17. The town centre suffers from traffic congestion, particularly at the north of the High Street and along Broad Street, with most issues occurring at the traffic light junction at the north of the High Street. The on-street car parking at Market Street creates additional traffic congestion, impacting on safe and convenient pedestrian access around this part of the centre, one of March's prime retail areas.
- 1.18. Further, pathways are relatively narrow along the High Street which has high traffic flows. Also, pedestrian access to both the town centre's main car parks to the High Street are not well defined and of limited environmental quality.

Accessibility

- 1.19. March town centre is accessible by a range of means of transport, including public transport, private car and also by pedestrians. Whilst not within the town centre, the train station is within walking distance and has regular services to a number of towns within the region.

- 1.20. The bus links from the town centre are good with regular buses providing access from the town centre to the wider urban area and surrounding towns, including Chatteris and Wisbech.
- 1.21. There is an on-road cycle route that runs through the town centre which provides a link to the surrounding residential areas.
- 1.22. Further details of the accessibility of the town are provided within the accompanying Transport Assessment.

Environmental Quality

- 1.23. Most of the defined town centre is designated as a Conservation Area reflecting the market town history. The centre is overall a pleasant environment and has the benefit of the river setting which flows through the town centre.
- 1.24. The adopted Local Plan does not identify any development sites in the town centre, but there has been relatively recent development and investment in the form of the library scheme to the west of High Street and the West End DIY/garden centre at the southern end of the High Street.
- 1.25. However, the March Neighbourhood Plan recognises that a large part of the town centre has derelict and underutilised backland that could be regenerated to the wider benefit of the town centre. There is therefore potential within the town centre to improve its overall offer and appearance in the future.