



Aldi Stirling – Proposed Store Extension

Aldi Store, 2B Springbank Road, Stirling, FK7 7WR

November 2023

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Report Title: Aldi Stirling Proposed Store Extension – Planning and Retail Statement

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For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 This Planning Statement has been prepared by Avison Young on behalf of Aldi Stores Ltd (“the applicant”). It is submitted in respect of a detailed planning application relating to the proposed delivery of an extension to an existing Class 1A retail foodstore in Stirling.
- 1.2 A full description of the proposed development is as follows:
- “Proposed erection of extension to existing Aldi store with car park alterations and other associated works.”*
- 1.3 Aldi are pleased to be able to submit this detailed planning application to seek approval for the layout and design of the proposed extension to rear of their existing store in Stirling. These proposals present a significant investment by Aldi and are a sign of their long-term commitment to the local area and further contributes to improving the quality and experience for shoppers in this part of Stirling.
- 1.4 This planning statement is supported by the following documents which are to be submitted as part of the planning application, comprising:
- Application form and ownership certificate, duly signed; and
 - Full suite of architectural plans including:
 - Site location plan.
 - Existing and proposed site plans.
 - Existing and proposed elevational plans.
 - Existing and proposed roof plans.
 - Existing and proposed floor plans.
- 1.5 This assessment includes background information on Aldi, to help understand the specific format of retail use proposed. This background on Aldi as a retailer is considered to be particularly relevant to assessing the proposals against relevant planning policy and in informing our assessment against retail policy matters.
- 1.6 The remainder of this statement has been set out within the following sections:
- **Section 2:** Aldi Stores Ltd
 - **Section 3:** Site Description and Surroundings
 - **Section 4:** The Proposed Development
 - **Section 5:** The Development Plan
 - **Section 6:** Planning Policy Assessment
 - **Section 7:** Retail Policy: Impact
 - **Section 8:** Retail Policy: Sequential assessment
 - **Section 9:** Town Centre Health Checks
 - **Section 10:** Conclusions

2. Aldi Stores Ltd

Who is Aldi?

- 2.1 Aldi is one of the world's leading grocery retailers. The company has built a network of stores in Europe, the USA and Australia. Aldi first entered the UK market in 1990 and has now expanded to 1,000 stores across England, Scotland and Wales. Within Scotland, there are now 104 trading stores.
- 2.2 Aldi stores offer the customer a carefully selected range of high quality, exclusive own label groceries at heavily discounted prices. These prices are guaranteed across the entire range of products. The aim is for goods to be sold with discounts of between 20–30% for a full shopping trolley.
- 2.3 Aldi regularly receives industry awards recognising the quality of its products and customer experience. Aldi was voted Retailer of the Year 2021, Favourite Wine Retailers and Favourite Premium Supermarket Range at the Good Housekeeping Food Awards 2021. For recognition of investment in people, Aldi was crowned Employer of the Year at The Grocer Gold Awards 2018. In 2021, Aldi won over 13 different awards over a variety of categories and most recently, in 2022, Aldi were crowned WHICH? Cheapest supermarket.

How Aldi is different

- 2.4 Aldi has a very different approach to food retailing than other food retailers based on simplicity and maximum efficiency at every stage of the business, from supplier to customer. This enables Aldi to sell high quality products, from a limited core range (compared to other supermarkets) of mainly exclusive own labels, at the lowest possible price consistently across the entire range. Aldi is a 'deep discount' retailer.
- 2.5 The main points of the trading philosophy include:
- Maximum operational efficiency and cost control;
 - Standard merchandising through the stores;
 - Bulk displays in original shipping cases;
 - Efficient operation from supplier to customer;
 - Unique delivery system;
 - Efficient checkout system;
 - Carefully selected and limited core range of 1,500 products;
 - Own label high quality products;
 - Formidable buying power;
 - High volume and turnover per product; and
 - Heavily discounted prices providing an average 20-30% saving across the entire range, compared with similar quality products.
- 2.6 The consequence of providing this value retailing concept and service, of high-quality food at heavily discounted prices, is that the design of the store and the sales area are uniform, in order to accommodate bulk food displays and provide the operational efficiency that a discount foodstore requires. These efficiencies are found across the entire operation from supplier to retail store and result in an enviable cost structure which allows Aldi to sell quality food at low prices and operate on much smaller margins than other foodstores.

- 2.7 As stated, Aldi stores offer a carefully selected and limited core range of good quality exclusive own labels at heavily discounted prices. Predominantly, the limited range of goods relates to a reduced range of variations on the same product line compared to most other supermarkets. These are the most popular items: the ones most used and needed in every household.
- 2.8 By limiting the core range, Aldi suppliers typically only need to produce one package size instead of multiple packages within the same category. With the higher volume of one item, Aldi achieve greater purchasing power. The limited core range further allows Aldi to apply its own label to most of its products (c.90%) which do not include costs that the national brands pass on through higher prices. This allows Aldi to gain a significant cost advantage over competitors without compromising quality.
- 2.9 The deliberate intention is to restrict the range of core goods to approximately 1,800 products in the interests of the consumer and operational efficiencies and pass these savings onto the customer. The restricted core range ensures a high volume and turnover of each individual item, resulting in a favourable cash flow with products effectively sold through the checkouts before they have been purchased centrally.
- 2.10 This is unlike the larger supermarkets which stock in the region of 20,000 - 40,000 product lines, and more modest sized operators, with floor areas of 1,000 - 1,500 sqm selling 2,500 - 4,000 products. Aldi do not sell cigarettes and tobacco products, stationery products and pharmaceutical products. The Aldi trading philosophy does not include a specialist butcher, fishmonger, in-store bakery, delicatessen or hot food counter which are commonplace in larger supermarkets. Aldi stores also do not accommodate in store cafes / restaurants or franchises such as photo processing, dry cleaning or opticians.
- 2.11 Whilst the core range of products is limited, Aldi offers a significant choice of locally sourced produce from Scotland. This is currently 30% of the overall product range in their Scottish stores. All of Aldi's fresh meat and produce is UK sourced. In Scotland, this includes 100% of pork, 96% of the total beef range and 100% Scottish lamb. Fresh fruit and vegetables are also sourced in the UK when in season and Aldi leads the way in supporting British farmers. In addition, Aldi works with a range of local businesses and suppliers in order to supply fresh bread, milk and other dairy products. All the milk and cream in their Scottish stores are sourced from Scottish dairy farmers.
- 2.12 Aldi's stores dedicate approximately 20% of their floorspace to comparison goods. These goods are sold as 'special purchases' on a 'when it's gone, it's gone' basis. This approach is highly seasonal and there is a continued variation in the type of goods that may be on offer. This is a key difference for Aldi when compared to larger supermarkets that typically have 30-40% of their floor area for comparison goods, the majority of which is occupied by permanent product ranges.
- 2.13 How Aldi differs is demonstrated clearly by the trading philosophy. Aldi complement, rather than compete with, existing local traders, independent retailers and other supermarkets, as well as service providers, as Aldi customers use other facilities to fulfil their grocery and local service needs. This generates a propensity for linked trips and associated spin-off trade which brings qualitative benefits.

Sustainable development

- 2.14 Aldi supports sustainable development and has a strong track record in delivering schemes which contribute to the needs of the local economy.
- 2.15 The following table sets out a summary of the sustainability features incorporated into each Aldi foodstore as standard:

Table 1: Aldi Store Sustainability Features (Source: Aldi and Project Team)

Main themes	Sub Theme	Proposed Measures to be Incorporated into the Development
Minimise Energy Use	Improving Building Envelope	Improve building fabric performance by using materials with low U values.
		Reduce Air Permeability for the development.
	Reducing Energy Demand	Use of LED technology for internal / external lighting. Reduce lighting levels outside trading hours and switch off all lights when store is unoccupied
		Detailed Specification of energy saving fitting for refrigeration system including sliding doors on freezers and doors on multideck chillers
Allocation of Renewable Energy	Re-use of waste heat from refrigeration system to heat the retail area.	
Sustainable Building Materials	Material Specification	Use of recycled and secondary aggregates where possible.
		Use of timber from sustainable sources, including the reuse of timber where possible, whilst procuring new timber from sustainable sources such as FSC and PEFC sources.
		Use of materials that where possible have a low embodied energy, including making firm commitments to procure materials from local sources where possible.
		Procuring materials will be done with consideration to manufacturers and suppliers with accredited EMS and ISO Standards.
Sustainable Transport and Accessibility		Cycle parking for the Site would be provided in accordance with LPA cycle parking standards.
Water Conservation and Management	Water Use within the Retail	A pulsed water meter would be proposed for the development to monitor water use.
		2/4 litres WCs in retail store.
	Minimising Flood Risk	Proposals would be put forward that would not add to the flood risk in the area. A number of SUDS and engineering solutions could be put forward for this purpose, subject to site specific conditions.
Waste Management	Construction Waste	Recycling would occur during the construction phase where waste would be segregated and split into recyclable components.
		General waste would be disposed of responsibly and sent to licensed waste handling facilities.
Reduction of detrimental Environmental Effects		Hydrocarbon traps will be placed around the perimeter of the car park area where necessary.
		The development does not include materials that are toxic to humans.
		Where necessary, land contamination would be remediated.

Main themes	Sub Theme	Proposed Measures to be Incorporated into the Development
		External lighting will be compliant to best practice guidelines from the Institute of Lighting.
Site Management	Commissioning and Handover	A building user guide and building education would be provided as part of the development's handover.

- 2.16 Perhaps the most significant sustainability feature which is provided as standard on all Aldi foodstores is their 'heat recovery system', which constitutes a 're-usable' energy source. In order to minimise energy demand in stores, Aldi seek to re-use and re-cycle any waste energy where possible. The greatest area to recover energy in the store is the 'waste heat' generated by the refrigeration system and this is recovered to heat the building.
- 2.17 Aldi use a system to recover waste heat from the food refrigerator circuits which would otherwise be discharged into the atmosphere. The heat from the refrigerator would previously have been rejected when the refrigerant hot gasses are cooled in the condensers by external air. Previously a gas heating system was used to make up any shortfall in heating demand.
- 2.18 With the input and detailed design of a 'refrigeration engineer' and a 'mechanical services engineer', the waste heat is harnessed via a CO2 refrigerant lead heat recovery system that rejects the waste heat into a low temperature hot water heating circuit which in turn provides heat to an underfloor heating array or a number of ceiling mounted convectors on the sales floor if the store is leasehold. The underfloor heating system provides heat to the store with a high percentage of radiant heat, minimising the negative affect that the sales floor chillers have on the store heating.

Catchment

- 2.19 As Aldi stores are of modest scale and fulfil a neighbourhood shopping role, it means more than one store can be accommodated in a Local Authority area or indeed, a town or city. Aldi's local presence can assist in clawing back expenditure being spent elsewhere by providing a food store where perhaps such a facility was not available. This is most important in locations where shops and services are limited and access to stores elsewhere is difficult. A new store helps to retain expenditure within a given catchment area, to the benefit of the community.

Store operation and design

- 2.20 The uniform internal layout of an Aldi store reflects the company philosophy of offering value for money through cost effective management and efficiency. The shop fittings are specifically designed and constructed to display the goods as received in their packing cases so there isn't a double handling of goods from packing cases to the shelves. It means new stock can be moved from the warehouse area to the shop floor quickly and in large quantities.
- 2.21 The operation of the store is designed to be efficient and practical for use by customers; ensuring the store offers inclusive accessibility to all. The efficient layout with typically only 4 or 5 aisles means customers can move through the store quickly. There is ease of access to goods with all shelving being within easy reach. As the range of goods is limited customers can find what they are looking for quickly. With goods being pre-packaged, such as fruit and vegetables, customer can identify goods quickly and shop efficiently. Importantly, there are long conveyors at the check-out that hold a customer's full shop to allow goods to be unloaded for scanning and payment quickly. Goods are re-

loaded back into the trolley at the check-out and packing is undertaken at the customer's leisure beyond the check-out area.

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

Accessibility

- 2.23 The local nature of many of Aldi's stores encourages high levels of pedestrian shoppers and users of public transport. At new stores, cycle stands are provided, close to the store entrance for natural surveillance and mostly under the store canopy, to encourage a more sustainable mode of transport.
- 2.24 Aldi requires new stores to have car parking adjacent to cater for customers who choose this mode of transport. Most car trips to new Aldi stores are not new to the network but rather transferred or linked trips.

Residential amenity

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

Job creation and training

- 2.26 New Aldi stores generally employ up to 35 staff. It is Aldi's preference to recruit staff locally. The company's remuneration and training policy reflects Aldi's firm belief that a well-trained and highly motivated workforce is essential to the success of the business. All hourly paid wages for store employees exceed the Government's National Living Wage and the Living Wage Foundation's recommended national rate. Aldi offers full training for all its positions and the schedule and facets of the training are tailored to the individual.
- 2.27 Aldi has two of the most successful apprentice schemes and graduate programmes in the UK. Apprentices are trained to work in all parts of the business including at store, distribution, logistics and management level, as well as progression through to the Store Management Team.
- 2.28 Aldi's on-going graduate scheme secures an annual intake for the Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK-wide programme.
- 2.29 The construction of a new store requires the services of local building trade contractors which provides employment opportunities during the build out period. Usually, a range of skills such as ground works, steel, brick and block work and shop fitting are sourced locally where possible, as well as cleaners and labourers.
- 2.30 Combined, the factors set out above are consistent across every store that Aldi operates. Collectively, they help to understand the Aldi 'business model' and how they are essential to the viability of the overall operation and the suitability of sites they acquire.

3. Site Description and Surroundings

- 3.1 The application site extends to approximately 0.97 hectares (2.39 acres). A site location plan is included at **Appendix 1** of this report, with an extract of this shown below.

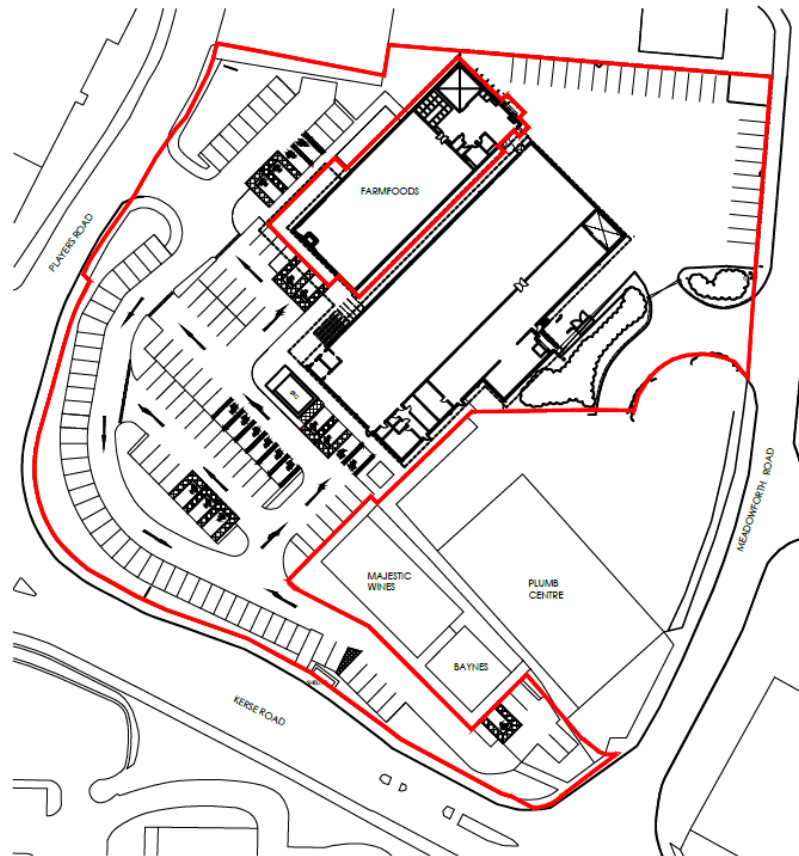


Figure 1: Extract from Location Plan

- 3.2 The Aldi store is located to the immediate east of Stirling City Centre. The Aldi site boundary lies adjacent to the City Centre boundary, with Players Road acting as the boundary to the City Centre. It is therefore considered that while the site lies outwith the City Centre boundary, it is as an edge of centre location in retail terms.
- 3.3 The surrounding area is predominantly commercial in nature, with a Lidl foodstore and B&M Home Store to the north-west and west respectively, while directly adjacent to Aldi store is a Farmfoods retail unit. To the immediate south, Majestic Wines, Baynes Bakery and Wolseley Plumb and Parts Centre are all present, forming a small retail park alongside the Aldi store. Further south/south-east there lie multiple car garages and showrooms, with a Stirling Council office also present. Springkerse Council Depot is to the south-east, with a Halfords garage and service centre to the east. To the north of the Aldi foodstore, there are three office blocks. A cluster of residential dwellings are also located to the north-east, the only residential properties in this area.
- 3.4 Looking further north-east, the Ministry of Defence occupy a large site for training and administration functions, while beyond this, lies the River Forth. There is a leisure park which includes a cinema, budget hotel and a number of restaurants, as well as the Barrack's Conference Centre further north-west.

- 3.5 According to the SEPA flood map, there is a *'medium to high likelihood'* of surface water flooding within the site car park and service yard.

Planning History

- 3.6 We have provided a summary of the planning history as available from the Stirling Council planning portal for the Springbank Road site in the table below.

Application:	Details:	Status:
04/00767/DET	Erection of four retail units, associated car parking and relocation of coal yard.	This application was granted subject to conditions in December 2004. The development was completed shortly thereafter.
13/00112/FUL	Erection of rear extension to 2B Springbank Road, relocation of service bay of 2A Springbank Road from south to east elevation and alterations to staff car park.	This application was granted subject to conditions in April 2013 and delivered shortly thereafter.

- 3.7 Application 04/00767/DET was granted subject to conditions in December 2004 for the *"Erection of four retail units, associated car parking and relocation of coal yard"*. This permission was implemented and forms the basis of the existing Aldi store and wider site today. There is no further information or documents available for this application on the planning portal.
- 3.8 In 2013, an application was submitted by Aldi to extend the existing store to the rear, creating an additional 169 sqm of sales floorspace. This application, 13/00112/FUL for the *"Erection of rear extension to 2B Springbank Road, relocation of service bay of 2A Springbank Road from south to east elevation and alterations to staff car park"* was approved in April 2013. The minor extension forms the Aldi store as it currently stands today.
- 3.9 In the last decade, since the 2013 extension permission, there have been a handful of minor applications at the Aldi foodstore. These include advertisement and signage applications, plant and futureproofing works to the service yard and the installation of a reverse vending machine as part of the deposit return scheme.

4. The Proposed Development

4.1 The proposals include a tow-storey extension of the existing Aldi foodstore to increase the sales floorspace of the store, provide improved back of house warehousing, create new staff amenity floorspace (first floor) and incorporate a new servicing entrance. The table below provides a comparison of the existing and proposed store sizes for clarity.

Table 2: Existing and Proposed Store Size and Car Parking

	Existing Store	Proposed Store	Difference
Gross External Floor Area (sqm)	1,527	1,807 (exc. first floor)	+280
Gross Internal Area (sqm)	1,470	1,871 (inc. first floor)	+401
Sales Floorspace (sqm)	998	1,365	+377
Car Parking Provision	154	144	-10

4.2 It is proposed that the small-scale extension would be formed on the south-east elevation to provide the new floorspace outlined above. This layout has been designed to maximise the available space around the unit, which is somewhat restrictive, to ensure the futureproofing of the current Aldi store. It is noted that the proposed extension will also include a small first floor which will house the staff amenity areas. The extension would take the same built form and external appearance as the existing store as per the below proposed site plan and elevational plan.

4.3 The proposed site layout and elevational plan is reproduced in the extract below:

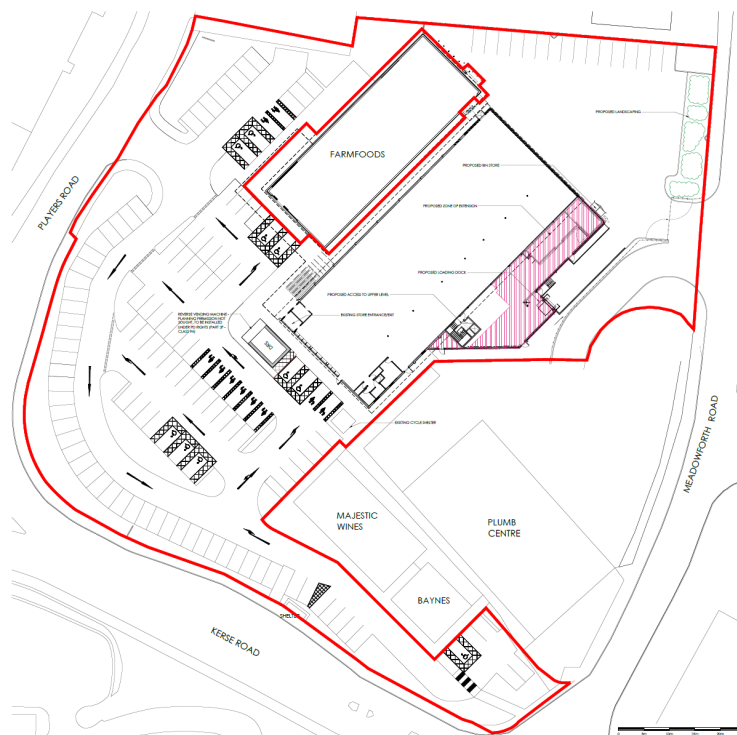


Figure 2: Extract from Proposed Site Plan



Figure 3: Extract of Proposed Building Elevations

- 4.4 As shown in the building elevations above, the proposals include external materials which have been chosen to ensure the design is in keeping with the existing Aldi store and respectful to the areas surrounding. The external elevations of the proposed extension will be comprised of low level black brick with Kingspan metallic silver and anthracite composite cladding above.

5. The Development Plan and Other Material Considerations

- 5.1 Section 37 of the Town and Country Planning (Scotland) Act 1997 (as amended) requires that planning applications be determined in accordance with the Development Plan unless other material considerations indicate otherwise. This section therefore considers the relevant policy context at national and local level, as well as other material considerations relevant in the determination of this application.
- 5.2 The Development Plan which is of relevance to this application is outlined below and appraised in the following section.
- 5.3 It is the position of the applicant that on a proper interpretation and application of the Development Plan, the proposed development is compliant and accordingly satisfies the requirements of Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended).

The Development Plan

- 5.4 The statutory Development Plan for the site comprises the National Planning Framework 4 ("NPF4") adopted in February 2023 and the Stirling Local Development Plan 1 ("LDP") adopted in October 2018. Stirling Council are currently in the very early stages of preparing their next Local Development Plan, which upon adoption, will replace the current Stirling Local Development Plan. At this time, limited progress has been made with the preparation of the replacement plan, and it is noted that the Council will not be in a position to produce their evidence report until the Spring of 2024. A revised LDP is not expected to be adopted until 2027. As such this information is for noting only.
- 5.5 Section 24(3) of the Town and Country Planning (Scotland) Act 1997 (as amended) states: *"In the event of any incompatibility between a provision of the National Planning Framework and a provision of a local development plan, whichever of them is the later in date is to prevail."* Following the adoption of NPF4 in February 2023, it is therefore clear that NPF4 takes precedence over the LDP.
- 5.6 Additionally, in February 2023, Stirling Council published an Interim Customer Guidance Note which set out the rationale the Council would use for the application of development plan policy in the assessment of planning applications in relation to any incompatibilities with the LDP and NPF4. This guidance highlighted a range of guiding principles which should inform the question of incompatibility, ultimately, with the Council considering the issue of incompatibility with due regard to the specific circumstances of a particular application.

National Planning Framework 4

- 5.7 The National Planning Framework 4 ("NPF4") came into force on 13th February 2023. It therefore forms part of the Development Plan which all planning applications should be assessed against.
- 5.8 Having reviewed NPF4, its role and purpose is set out at Annex A, which also provides detail of how it should be used. It states that ***"NPF4 should be read as a whole. It represents a package of planning policies to guide us to the place we want Scotland to be in 2045."*** (AY Emphasis).
- 5.9 Furthermore, at page 98 of Annex A3 it also states that ***"Planning is complex and requires careful balancing of issues. The policy intent is provided to aid plan makers and decision makers to understand the intent of each policy and to help deliver policy aspirations."*** (AY Emphasis).

“The policy sections are for use in the determination of planning applications. The policies should be read as a whole. Planning decisions must be made in accordance with the development plan, unless material considerations indicate otherwise. It is for the decision maker to determine what weight to attach to policies on a case by case basis. Where a policy states that development will be supported, it is in principle, and it is for the decision maker to take into account all other relevant policies.”

- 5.10 The document is split into two main parts. Part 1 deals with the spatial strategy for Scotland and focusses on addressing climate change, nature recovery, inclusive growth, the wellbeing economy, and child poverty. These aspirations are detailed across three main national planning policy areas, namely: Sustainable Places, Liveable Places and Productive Places.
- **Sustainable Places** focuses on the transition to net zero through the creation of nature-positive places that are designed to reduce emissions and adapt to the impacts of climate change whilst protecting the environment.
 - **Liveable Places** applies the principles of local living to development proposals meaning homes should be better served by local facilities and services. The concept of 20-minute neighbourhoods will help to support this, particularly in more urban areas.
 - **Productive Places** reaffirms the commitment to the Town Centre First Principle.
- 5.11 Part 2 then details the individual policies within Sustainable, Liveable and Productive Places, which have relevance to the planning application. Each policy includes a Policy Intent and a Policy Outcome alongside policy wording. All of these elements should be considered in the assessment of each policy.
- 5.12 Below, we have provided a copy of all policies within NPF4 that are relevant to these proposals.

Sustainable Places

- 5.12 Firstly, **Policy 1: Tackling the Climate and Nature Crisis** states:

*“**Policy Intent:** To encourage, promote and facilitate development that addresses the global climate and emergency nature crisis.*

***Policy Outcomes:** Zero carbon, nature positive places.*

***Policy:** When considering all development proposals, significant weight will be given to the global climate and nature crises.”*

- 5.13 Similarly, **Policy 2: Climate Mitigation and Adaption** notes:

*“**Policy Intent:** To encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change.*

***Policy Outcomes:** Emissions from development are minimised; and, Our places are more resilient to climate change impacts.*

***Policy:** Development proposals to retrofit measures to existing developments that reduce emissions or support adaptation to climate change will be supported.”*

- 5.13 Whilst the site isn't true brownfield land, it involves an increased efficiency in the use of land, therefore **Policy 9: Brownfield, Vacant and Derelict Land and Empty Buildings** is relevant stating:

“Policy Intent: To encourage, promote and facilitate the reuse of brownfield, vacant and derelict land and empty buildings, and to help reduce the need for greenfield development.

Policy Outcomes: Development is directed to the right locations, maximising the use of existing assets and minimising additional land take; The contribution of brownfield land to nature recovery is recognised and opportunities for use as productive greenspace are realised where appropriate; and Derelict buildings and spaces are regenerated to improve wellbeing and transform our places.

Policy:

- a) Development proposals that will result in the sustainable reuse of brownfield land including vacant and derelict land and buildings, whether permanent or temporary, will be supported. In determining whether the reuse is sustainable, the biodiversity value of brownfield land which has naturalised should be taken into account.
- b) Proposals on greenfield sites will not be supported unless the site has been allocated for development or the proposal is explicitly supported by policies in the LDP.
- c) Where land is known or suspected to be unstable or contaminated, development proposals will demonstrate that the land is, or can be made, safe and suitable for the proposed new use.
- d) Development proposals for the reuse of existing buildings will be supported, taking into account their suitability for conversion to other uses. Given the need to conserve embodied energy, demolition will be regarded as the least preferred option.”

5.14 Finally, **Policy 13: Sustainable Transport** is relevant to consider. This policy states:

“Policy Intent: To encourage, promote and facilitate developments that prioritise walking, wheeling, cycling and public transport for everyday travel and reduce the need to travel unsustainably.

Policy Outcomes:

- Investment in transport infrastructure supports connectivity and reflects place-based approaches and local living.
- More, better, safer and more inclusive active and sustainable travel opportunities.
- Developments are in locations which support sustainable travel.

Policy: (b) Development proposals will be supported where it can be demonstrated that the transport requirements generated have been considered in line with the sustainable travel and investment hierarchies and where appropriate they:

- i. Provide direct, easy, segregated and safe links to local facilities via walking, wheeling and cycling networks before occupation; and
- ii. Will be accessible by public transport, ideally supporting the use of existing services”

Liveable Places

5.15 NPF4 places importance on ensuring that development is well designed, with **Policy 14: Design, Quality and Place** providing further detail. It states:

“Policy Intent: To encourage, promote and facilitate well designed development that makes successful places by taking a design-led approach and applying the Place Principle.

Policy Outcomes: *Quality places, spaces and environments; and, Places that consistently deliver healthy, pleasant, distinctive, connected, sustainable and adaptable qualities.*

Policy:

- a) *Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale.*
- b) *Development proposals will be supported where they are consistent with the six qualities of successful places:*

Healthy: *Supporting the prioritisation of women's safety and improving physical and mental health.*

Pleasant: *Supporting attractive natural and built spaces.*

Connected: *Supporting well connected networks that make moving around easy and reduce car dependency*

Distinctive: *Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.*

Sustainable: *Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.*

Adaptable: *Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time. Further details on delivering the six qualities of successful places are set out in Annex D.*

- c) *Development proposals that are poorly designed, detrimental to the amenity of the surrounding area or inconsistent with the six qualities of successful places, will not be supported."*

5.16 The importance of 20-minute neighbourhoods is noted throughout NPF4 and is specifically dealt with by **Policy 15: Local Living and 20-minute Neighbourhoods**. Policy 15 notes:

"Policy Intent: *To encourage, promote and facilitate the application of the Place Principle and create connected and compact neighbourhoods where people can meet the majority of their daily needs within a reasonable distance of their home, preferably by walking, wheeling or cycling or using sustainable transport options.*

Policy Outcomes: *Places are planned to improve local living in a way that reflects local circumstances; A network of high-quality, accessible, mixed-use neighbourhoods which support health and wellbeing, reduce inequalities and are resilient to the effects of climate change; New and existing communities are planned together with homes and the key local infrastructure including schools, community centres, local shops, greenspaces, health and social care, digital and sustainable transport links.*

Policy:

- a) *Development proposals will contribute to local living including, where relevant, 20 minute neighbourhoods. To establish this, consideration will be given to existing settlement pattern, and the level and quality of interconnectivity of the proposed development with the surrounding area, including local access to:*
 - *sustainable modes of transport including local public transport and safe, high quality walking, wheeling and cycling networks;*
 - *employment;*
 - *shopping;*
 - *health and social care facilities;*
 - *childcare, schools and lifelong learning opportunities;*
 - *playgrounds and informal play opportunities, parks, green streets and spaces, community gardens, opportunities for food growth and allotments, sport and recreation facilities;*
 - *publicly accessible toilets; and*
 - *affordable and accessible housing options, ability to age in place and housing diversity."*

5.17 Policy 22 requires consideration and states:

“Policy 22: Flood risk and water management

Policy Intent: *To strengthen resilience to flood risk by promoting avoidance as a first principle and reducing the vulnerability of existing and future development to flooding.*

Policy Outcomes: *Places are resilient to current and future flood risk; Water resources are used efficiently and sustainably; and, Wider use of natural flood risk management benefits people and nature.*

Relevant Policy Extract:

- a) *Development proposals will:*
- i. *not increase the risk of surface water flooding to others, or itself be at risk.*
 - ii. *manage all rain and surface water through sustainable urban drainage systems (SUDS), which should form part of and integrate with proposed and existing bluegreen infrastructure. All proposals should presume no surface water connection to the combined sewer;*
 - iii. *seek to minimise the area of impermeable surface.*
- d) *Development proposals will be supported if they can be connected to the public water mains. If connection is not feasible, the applicant will need to demonstrate that water for drinking water purposes will be sourced from a sustainable water source that is resilient to periods of water scarcity.”*

Productive Places

5.18 Given the content of the proposals, retail policies are relevant, and these are dealt with by **Policy 27: City, Town, Local and Commercial Centres** and **Policy 28: Retail**.

5.19 Firstly, Policy 27 notes:

“Policy Intent: *To encourage, promote and facilitate development in our city and town centres, recognising they are a national asset. This will be achieved by applying the Town Centre First approach to help centres adapt positively to long-term economic, environmental and societal changes, and by encouraging town centre living.*

Policy Outcomes: *Centres are vibrant, healthy, creative, enterprising, accessible and resilient places for people to live, learn, work, enjoy and visit; and, Development is directed to the most sustainable locations that are accessible by a range of sustainable transport modes and provide communities with easy access to the goods, services and recreational opportunities they need.*

Policy:

- a) *Development proposals that enhance and improve the vitality and viability of city, town and local centres, including proposals that increase the mix of uses, will be supported.*
- b) *Development proposals will be consistent with the town centre first approach. Proposals for uses which will generate significant footfall, including commercial, leisure, offices, community, sport and cultural facilities, public buildings such as libraries, education and healthcare facilities, and public spaces:*
 - i. *will be supported in existing city, town and local centres, and*
 - ii. *will not be supported outwith those centres unless a town centre first assessment demonstrates that:*
 - *all centre and edge of centre options have been sequentially assessed and discounted as unsuitable or unavailable;*
 - *the scale of development cannot reasonably be altered or reduced in scale to allow it to be accommodated in a centre; and*

- *the impacts on existing centres have been thoroughly assessed and there will be no significant adverse effect on the vitality and viability of the centres.*

Town Centre First Assessment

For development proposals which are out of city/town centre and which will generate significant footfall a Town Centre First Assessment will be provided. Applicants should agree the data required with the planning authority before undertaking the assessment, and should present information on areas of dispute in a succinct and comparable form. The town centre first assessment should: –

- *identify the potential relationship of the proposed development with the network of centres identified in the LDP;*
- *demonstrate the potential economic impact of the development and any possible displacement effects, including the net impact on jobs; and*
- *consider supply chains and whether local suppliers and workers will be a viable option; and*
- *the environmental impact of transporting goods and of staff and visitors travelling to the location.*

The town centre first assessment should be applied flexibly and realistically for community, education, health and social care and sport and leisure facilities so that they are easily accessible to the communities they are intended to serve”

5.20 Secondly, Policy 28 states that:

“Policy Intent: *To encourage, promote and facilitate retail investment to the most sustainable locations that are most accessible by a range of sustainable transport modes.*

Policy Outcomes: Retail development and the location of shops support vibrant city, town and local centres; and, Communities can access the shops and goods they need by a range of sustainable transport modes including on foot, by bike, and by public transport, as part of local living.

Policy:

- a) *“Development proposals for retail (including expansions and changes of use) will be consistent with the town centre first principle. This means that new retail proposals:

 - i. *will be supported in existing city, town and local centres, and*
 - ii. *will be supported in edge-of-centre areas or in commercial centres if they are allocated as sites suitable for new retail development in the LDP.*
 - iii. *will not be supported in out of centre locations (other than those meeting policy 28(c) or 28(d)).**
- b) *Development proposals for retail that are consistent with the sequential approach (set out in a) and click-and-collect locker pick up points, will be supported where the proposed development:

 - i. *is of an appropriate scale for the location;*
 - ii. *will have an acceptable impact on the character and amenity of the area; and*
 - iii. *is located to best channel footfall and activity, to benefit the place as a whole.**
- c) *Proposals for new small scale neighbourhood retail development will be supported where the proposed development:

 - i. *contributes to local living, including where relevant 20 minute neighbourhoods and/or*
 - ii. *can be demonstrated to contribute to the health and wellbeing of the local community.”**

Stirling Local Development Plan (2018)

5.21 Stirling Local Development Plan (LDP) was adopted in October 2018 and sets out the objectives and policy framework for new development in the wider Stirling area.

5.22 As shown on the proposals map extract below from the LDP, the Aldi site boundary neighbours the Stirling City Centre boundary, while the store itself sits approximately 45 metres further east. While

there is no definition in the Scottish Planning System for 'edge of centre', sites which lie within 300 metres of an existing centre boundary are typically considered to fall within the edge of centre catchment.

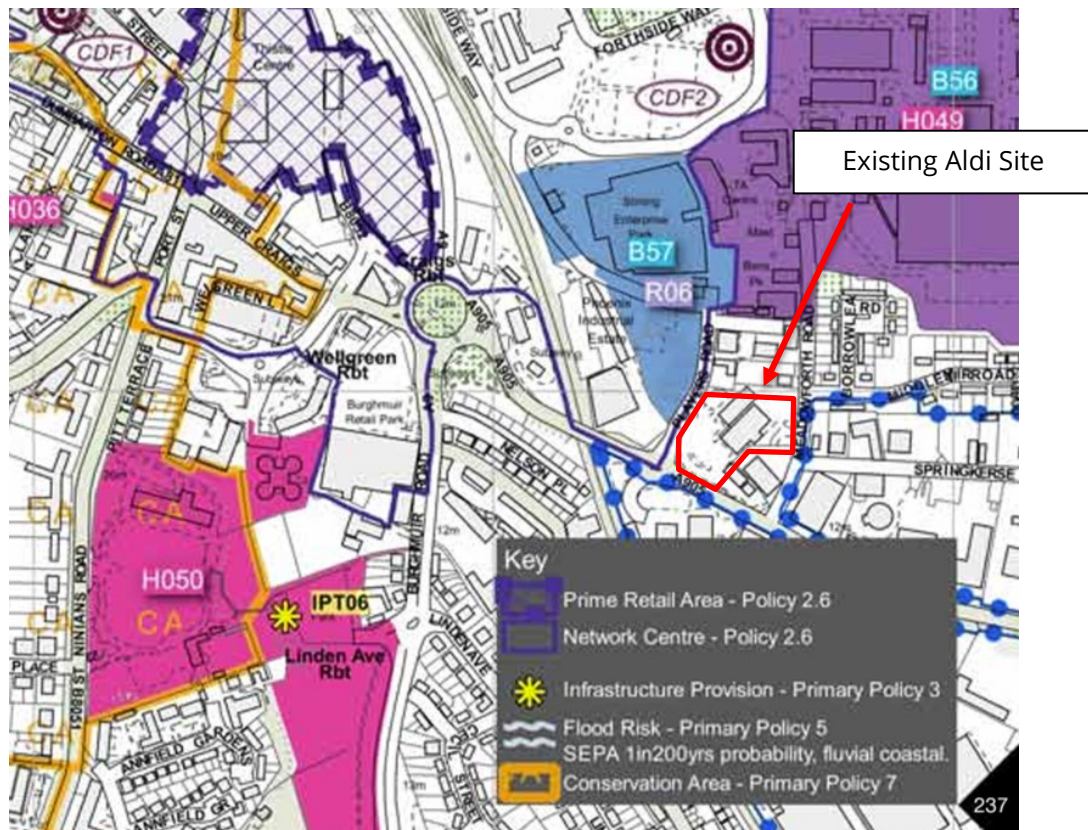


Figure 3: Extract from the Stirling City Centre Proposals Map from the Stirling Local Development Plan (2018)

- 5.21 Given this position, general policies within the LDP apply to development proposals on the site. Key policies which are relevant to these proposals are considered further below.
- 5.22 The LDP sets out a vision for the local authority area for the next 20 years. It states that: *"The Plan provides a positive approach to appropriate development and supports sustainable economic growth and sustainable development, while recognising the importance of 'placemaking' and safeguarding the area's important environmental and historic assets."*
- 5.23 The LDP builds on this vision to set out a spatial strategy, associated overarching policy and sustainable development criteria, before providing a range of policies which all development will be considered against.
- 5.23 We have provided a summary of a range of policies below from the LDP which are of most relevance to the Springbank Road site and these proposals. For ease, we have grouped these policies into the following sub categories:
- Overarching Policy;
 - Retail Policies;
 - Design Policies;
 - Transport Policies;

- Flooding and Drainage Policies; and
- Other Relevant Policies.

Overarching Policy

5.24 The overarching policy is split into 4 key parts being:

- “Placemaking & implementing the Spatial Strategy:*** *The quality and amenity of the places around us must be conserved and enhanced. Their influence on our ability to reduce health and social inequalities and promote wellbeing must be improved.*
- Climate change adaptation and mitigation:*** *The resilience of people and places in the face of climate change must improve, with new development discouraged in places where climate-related hazards are present or predicted, such as flood plains. New development must be more efficient in its use of resources and enable reductions in traffic generation.*
- Conservation of historic and natural heritage:*** *Much of the local economy, and the quality of life and the health of residents is underpinned by the wealth of heritage features in the area and the quality of surrounding landscapes.*
- Managing and utilising local resources:*** *The local economy is also dependent to a significant degree on natural resources and the ways in which local communities interact with these to support employability and health.”*

5.25 The LDP is then set out with this structure. Each aim comprises several ‘**Primary Policies**’, with each primary policy then containing a number of more specific policies.

5.26 It is important to note that **Part D** of the LDPs overarching policies does not contain any policies which relate to these proposals.

5.27 Regarding the overarching policy itself, it states:

“This Plan supports good quality development, in the right place, that meets the community’s needs (social, economic and environmental), in order to contribute positively to the creation of vibrant, mixed and healthy communities. All developments, land use changes and other proposals, plus related frameworks, masterplans, planning briefs, strategies, etc, will require to demonstrate the following:

- Compatibility with the Spatial Strategy and conformity with the relevant Sustainable Development Criteria.*
- A design-led approach, including high standards of design, reinforcement of a sense of place, integration with neighbouring areas and the wider community.*
- Appropriate measures for mitigation of and adaptation to climate change which seek to ensure an area’s full potential for electricity and heat from renewable sources is achieved.*
- Appropriate measures for the safeguarding, conservation and enhancement of the historic and natural environment.*
- Safeguarding and appropriate management and utilisation of natural resources.*
- Adherence to the principles of the National Planning Framework proposal for a Central Scotland Green Network, with relevant contributions to local and national Green Network and Green Infrastructure objectives.*

In addition, there will be a presumption in favour of development that contributes to sustainable development, defined as development which meets the following Sustainable Development Criteria.”

5.28 A number of criteria are then provided in terms of sustainable development:

- 1) *“Improve the overall quality of the built environment.*

- 2) *Contribute to reduction in greenhouse gas emissions, in line with or better than national targets, and encourage energy and heat efficiency, and the use of low and zero carbon power generation.*
- 3) *Reduce the need to travel and reliance on the private car by encouraging active travel and other more sustainable travel and transport opportunities.*
- 4) *Support Zero Waste objectives, and minimise the life-cycle resource requirements.*
- 5) *Avoid areas at risk of flooding and erosion.*
- 6) *Protect and enhance the historic and cultural environments, and the natural environment (including biodiversity and landscape), and responsible access to such environments.*
- 7) *Minimise adverse impacts on water, air and soil quality.*
- 8) *Support healthy and safer lifestyles, by improving access to amenities, promoting access to open space and other recreation opportunities and by addressing environmental problems.*
- 9) *Involve re-use and/or regeneration of previously used land and property, including derelict and contaminated land, and the re-cycling of construction materials.*
- 10) *Make efficient use of existing and new infrastructure.*
- 11) *Create net economic benefit for the area."*

The relevant policies from each section are highlighted under each overarching theme below. (A) [Placemaking and implementing the spatial strategy](#)

- 5.29 The relevant policies of this section of the LDP are **Primary Policy 1: Placemaking**, alongside **Policy 1.1: Site Planning**. **Primary Policy 2: Supporting the Vision and Spatial Strategy** is also relevant, alongside **Policy 2.6: Supporting Town Centres** and **Policy 2.7: Retail and Footfall Generating Uses**. Finally, **Policy 3.1: Addressing the Travel Demands of New Development** and **Policy 3.2: Site Drainage**.

(B) [Climate change adaptation and mitigation](#)

- 5.30 **Primary Policy 4: Greenhouse Gas Reduction** alongside **Policy 4.1: Low and Zero Carbon Buildings** are both relevant. **Primary Policy 5: Flood Risk Management** is applicable given the SEPA flood allocation noted in Section 2 of this report.

(C) [Conservation of historic and natural heritage](#)

- 5.31 Although the site is not located in an area of special landscape, **Primary Policy 9: Managing Landscape Change** is relevant particularly in matters of **Policy 9.3: Landscaping and Planting in Association with Development**.

Retail Policies

- 5.32 Retail matters are dealt with by **Policy 2.6: Supporting Town Centres** and **Policy 2.7: Retail and Footfall Generating Uses**. Taking each in turn below:
- 5.33 Policy 2.6 states that: *"Town centres, including the City Centre and local centres, will be the preferred locations for uses which generate significant footfall, including retail. Proposals for all new retail and commercial leisure development within the identified Network of Centres will be assessed against Policy 2.7 Retail and Footfall Generating Uses."* As noted, the site is on the cusp of the town centre boundary, as such, while the policy deals with strictly town centre development, it is still important to consider given the proximity to the Aldi store.
- 5.34 Policy 2.7 makes cognisance of the retail hierarchy for new development of this type. The policy notes that: *"All other retail or commercial leisure development or other town centre use, as defined in the LDP glossary, which would generate significant footfall must provide evidence that the sequential approach to site selection has been used in the following order of preference:*

- *City Centre, Town Centre or Local Centre*
- *Edge of Centre locations*
- *Commercial Centres*
- *Out of centre locations that are, or can be made, easily accessible by a choice of transport modes"*

5.35 The policy goes on to note that "*full justification as to why more sequentially preferable sites have been assessed and discounted as unsuitable or unavailable will be required*". The policy then sets out a range of criteria which must be satisfied in certain instances, including out of centre retail developments:

"On sites out with Network Centres that are not allocated for the proposed use or are inconsistent with the site allocation and its Key Site Requirements:

- *Demonstrate that there will be no unacceptable individual or cumulative impact on the vitality and viability of any Centre within the Network. A Retail Impact Analysis (RIA) must accompany retail proposals for more than 2,500sq.m. gross floorspace. For smaller developments, the requirement for an RIA will be at the Council's discretion.*
- *Demonstrate that the development will help to meet proven qualitative and quantitative deficiencies in existing provision.*
- *Demonstrate that the development will be of a scale, character, and design, commensurate both with the size of the catchment to be served, and if applicable, with the Centre(s) closest to where it is located."*

Design Policies

5.36 A number of design policies should be considered as part of any future planning application. **Policy 1: Placemaking** highlights that proposals should be designed and sited in relation to the character and amenity of the place where they are located. Further to this, **Policy 1.1: Site Planning** notes that: "*All new development, including alterations and extensions to existing buildings, are required to contribute, in a positive manner, to quality of the surrounding built and natural environment*", setting out a range of design criteria which should be adhered to as part of the proposals.

5.37 **Policy 9: Managing Landscape Change** also sets out a range of similar principles for proposals, noting that development should take account of the existing area with regards to development type and scale. This policy states:

"All development proposals should comply with the following:

- ii. *Outwith designated landscape areas (including areas of wild land) demonstrate that the capacity of the local landscape to accommodate new development of the type and scale envisaged has been taken into account.*
- iii. *Avoid adverse cumulative effects on landscape character and visual amenity."*

5.24 Finally, **Policy 9.3: Landscaping and Planting in Association with Development** is relevant to consider. This policy highlights that all new development should incorporate new landscape and planting works appropriate to the local context and to the scale and nature of the development.

Transport Policies

5.38 As a result of the reduction in car parking provision as part of this proposal, it is necessary to consider the LDP policies which relate to transport. **Policy 3.1: Addressing the Travel Demands of New**

Development covers this and notes that: *“In order to create accessible developments in sustainable locations, new development should be located where safely and conveniently accessible by walking, cycling and public transport as well as by motor vehicles. Wherever possible, new development should connect to existing, or provide new links to, sustainable transport options.”*

- 5.39 The policy goes on to highlight that: *“Development should aim to reduce its travel demands, and to ensure that residual demands are met in a manner which ensures a safe and realistic choice of access by walking, cycling, public transport and motor vehicles.”* This policy also outlines that electric vehicle charging points (EVCP) should be considered as part of any new development, something this proposal includes.

Flooding and Drainage Policies

- 5.40 The LDP includes a number of policies relating to flooding and drainage, with those being **Policy 3.2: Site Drainage** and **Policy 5: Flood Risk Management**. Taking each in turn below.

- 5.41 Policy 3.2 sets out the expectations for new development in regard to drainage. As this is an extension to an existing store, there are already appropriate foul and surface water drainage provisions in place.

- 5.42 Policy 5 is more relevant to these proposals given the SEPA flood map demonstrating that a portion of the site has a *‘medium to high likelihood’* of surface water flooding. The policy states that:

“Development proposals on areas shown to be at risk of flooding on the SEPA Flood Maps, or adjacent to a small watercourse (which has not been assessed on the SEPA Flood Maps i.e., with a catchment area less than 3km²), or in an area known to be at risk of flooding from any source:

- i. Shall be informed by a Flood Risk Assessment (FRA) assessing the risk from all sources of flooding. The FRA shall be carried out in compliance with SEPA’s Technical Flood Risk Guidance for Stakeholders.*
- ii. Will be assessed against advice and the Risk Framework in SPP relating to Flooding and Drainage.*
- iii. Shall not result in a use that is more vulnerable to flooding or has a larger footprint than any previous development on the site. Reference should be made to SEPA’s Land Use Vulnerability Guidance.*
- iv. Shall not increase the risk of flooding elsewhere.”*

Other Relevant Policies

- 5.43 **Policy 2: Supporting the Vision and Spatial Strategy** is a key policy within the LDP. This policy states that:

“Housing, employment and retail development proposals which are consistent with the Plan’s Vision and Spatial Strategy, will be directed to sites identified for those particular purposes in Appendix A and in the Settlement Statements. Outwith allocated sites, the Core Area will be the preferred location for new build development on sites located close to, and easily accessible by, major public transport routes.”

- 5.44 Finally, climate and Sustainability matters are covered by **Primary Policy 4: Greenhouse Gas Reduction** alongside **Policy 4.1: Low and Zero Carbon Buildings**, however, given these proposals relate to the extension of an existing building, Policy 4.1 can be discounted. Taking cognisance of Policy 4, a range of criteria are set out which include:

“In order to contribute to the aims of greenhouse gas reduction, all new development should:

- a) *Be in sustainable locations (with reference to the proposed main use or mix of uses, and existing or proposed infrastructure capacity).*
- b) *Optimise accessibility to active travel opportunities and public transport. In particular planning permission should not be granted for significant travel-generating uses at locations which would increase reliance on the car.*
- c) *Employ sustainable construction materials and methods, and provide energy and heat efficient accommodation with design and layout of buildings optimising passive environmental gains (solar, shelter, water use, etc.)”*

6. Planning Policy Assessment

6.1 This section appraises the application proposals against the relevant development plan and other material considerations established in the previous section.

6.2 It is noted that the key considerations in the determination of the proposals are as follows:

- The principle of retail;
- The proposals design;
- Transport matters;
- Sustainability considerations;
- Flooding and drainage matters; and
- Other relevant considerations.

The Principle of Retail

6.3 As already identified, the site is located out with the City Centre boundary of Stirling, however, does lie only approximately 45 metres to the east of the City Centre boundary. This means that the site is the second most favourable location in terms of the retail hierarchy noted from Policy 2.7 of the LDP and Policy 28 of NPF4, given it is considered to be located at an edge of centre location.

6.4 NPF4 Policy 27 notes that development proposals will be supported in existing city, town and local centres and that development proposals will not be supported outwith those centres unless a town centre first assessment demonstrates that *all centre and edge of centre* options have been sequentially assessed. This establishes that edge of centre locations are considered preferable in terms of Policy 27.

6.5 NPF4 places a preference on retail developments being located within an allocated centre, unless it meets the criteria as set out at part b)ii of Policy 27. This identifies that out of centre retail proposal will only be acceptable where a town centre first assessment has been completed, which addresses three criteria. In response to these three criteria:

- a) A sequential assessment of all in-centre opportunities has been undertaken and discounted as unsuitable or unavailable. This has been undertaken as set out at Section 8 and **Appendix 4**. This concludes there are no sequentially preferable sites within the catchment. We also consider below that the application proposals would support local living and 20-minute neighbourhoods, which is another significant theme set out within NPF4.
- b) The scale of development cannot reasonably be altered or reduced in scale to allow it to be accommodated in a centre. This is primarily owing to the lack of any such opportunities within those centres assessed, and also considering that the proposals relate to an extension to an existing store, which is significantly more sustainable than delivery of a new store elsewhere. It is noted that sustainability is another significant theme running throughout NPF4.
- c) The impacts on all existing centres within the proposed catchment of the store have been thoroughly assessed and there will be no significant adverse effect on the vitality and viability of the centres. This is undertaken in Section 7 of this statement, and **Appendix 2**, which

demonstrates that any impacts would be minimal on any identified centres within the proposed store catchment.

- 6.6 As the site is located in an edge of centre location, and only relates to a minor retail extension of an existing store, we consider that Policy 27 supports these proposals.
- 6.7 Turning to Policy 28, the application proposals support the policy intent by promoting retail investment at a sustainable location that would remain accessible by a range of sustainable transport modes, as identified in the transport section below. The location is also considered sustainable given there is an existing retail store present in this location and an extension to this would be more sustainable than delivering a new retail store elsewhere. It is also noted that the site lies in a retail-dominant mixed-use area.
- 6.8 Of the policy itself, part a) iii. states that retail proposals will not be supported in out of centre locations, other than those meeting Policy 28(c) or 28(d). We turn to this below; however, it is first worth considering part b) of the policy where it states that retail proposals that are consistent with the sequential approach (set out in part a) will be supported where certain tests are met. As set out in Section 8 and **Appendix 4** of this report, we believe that the proposals can be consistent with the sequential approach set out in part a) as it relates to out of centre locations. This also addresses the sequential requirements as set out by Policy 2.7 of the LDP. As such, we believe that part b) to Policy 28 can be applied to this proposal and addressed as follows:
- i. It is of a scale considered appropriate to serve localised needs.
 - ii. The proposals will have an acceptable impact on the character and amenity of the area, given they relate to an extension to an existing and active retail operation. The proposed layout and operation of the foodstore has been conceived to avoid any unacceptable impacts on the character or amenity of the area.
 - iii. It is a footfall generating use, located adjacent to a town centre where footfall and activity should be located.
- 6.9 Returning to part a) iii. retail proposals can be supported in out of centre locations where they meet parts c) or d). In this case, we believe that the proposals are of a scale that is consistent with that described in part c). Whatever the definition of a retail proposal, we believe that it is its contribution to parts c) i. and ii. which carries the greatest weight in considering whether such a proposal can be supported. This approach is reinforced by referring back to the policy intent and outcomes. As such, we believe that the proposals can be supported for the following reasons:
- They would contribute to local living, including 20-minute neighbourhoods (as required by Policy 15 of NPF4).
 - They would continue to provide local access to food shopping facilities.
 - They would provide continued local access to employment opportunities through the proposed extension and increased employment required, as well as during the construction period and through supporting Aldi's supply chain.
 - They would continue to encourage and promote the application of the Place Principle by helping to maintain and improve connected and compact neighbourhoods where local people can meet the majority of their daily needs within a reasonable distance of their home and by using sustainable forms of transport.

- They would contribute to the health and wellbeing of the local community by improving sustainable access to affordable and healthy eating, thereby helping tackle related inequalities and the cost-of-living crisis for local residents.

6.10 We are aware that there are a number of retail allocations within Stirling City Centre. Whilst this may be the case, relocating an existing Aldi store to accommodate an extended footprint is not a sustainable method of development. As such, we do not consider that these allocated sites are suitable for the proposed development. In addition, the proposed development will not impact on the viability of these sites as the floorspace extension is generally designed to provide an improved range and choice to existing shoppers, rather than attract significant numbers of new shoppers. This matter is explored further in the following section of this report.

6.11 In summary, the terms of Policy 28, where relevant, can therefore be addressed. For the reasons described above and elsewhere within this statement, it follows that the same can be said in respect of the policy principles, notably in relation to supporting local living and 20-minute neighbourhoods.

6.12 In this respect, Policy 15 deals with local living and 20-minute neighbourhoods. It is considered that the proposals will contribute to local living, including 20-minute neighbourhood principles as outlined above. As a result of this assessment, it is clear that the proposals are supported by Policies 15, 27 and 28 of NPF4.

6.13 It is also important to note, as mentioned, that the proposed minor extension is viewed as a sustainable option to increasing sales floorspace, without the need for a new store. This accords with the overarching themes of NPF4 including climate change mitigation and sustainability, as well as the reuse of existing buildings advocated by Policy 9 of NPF4. The proposals are further supported by Policy 1 and Policy 2 of NPF4 and Policy 4 of the LDP, with a focus on the climate and sustainability credentials of new development. These policies all seek to reduce and minimise emissions from developments wherever possible and encourage sustainable development in every instance.

The Proposals Design

6.14 Generally, the design of the extension has been devised to match the existing style of the store and is therefore considered to be appropriate. NPF4 Policy 14 requires all proposals to address the six qualities of a successful place. These are each considered further in the table below:

Table 3: Six Qualities of Successful Place (Policy 14, NPF4)

Six Qualities of Successful Place	Assessment
Healthy: Supporting the prioritisation of women's safety and improving physical and mental health.	These proposals seek to improve the discount food offering within Stirling by increasing sales floorspace, in turn, allowing more residents access to affordable healthy foods which can contribute to a range of factors such as physical and mental health. Passive surveillance offered by the store will ensure that safety of customers can be maintained during operational hours.
Pleasant: Supporting attractive natural and built places.	These proposals incorporate the existing Aldi store design features such as materials to ensure the proposed extension remains complementary to the surrounding area.

<p>Connected: Supporting well connected networks that make moving around easy and reduce car dependency.</p>	<p>Through these proposals, customer car parking levels will not change, with the site location continuing to connect into the wider public transport network in Stirling via Springbank Road.</p>
<p>Distinctive: Supporting attention to detail of local architectural styles and natural landscapes to be interpreted, literally or creatively, into designs to reinforce identity.</p>	<p>The design of the extension is very similar to the existing design of the building and is therefore in keeping with the existing architectural style of the area. This also ties in with the requirements of LDP Policies 1 and 1.1.</p>
<p>Sustainable: Supporting the efficient use of resources that will allow people to live, play, work and stay in their area, ensuring climate resilience, and integrating nature positive, biodiversity solutions.</p>	<p>As discussed in Section 2, Aldi incorporate a range of features into their store development to improve sustainability and operational efficiency. These are outlined further in the sustainability sub-heading of this section and in Section 2 of this statement.</p>
<p>Adaptable: Supporting commitment to investing in the long-term value of buildings, streets and spaces by allowing for flexibility so that they can be changed quickly to accommodate different uses as well as maintained over time.</p>	<p>These proposals seek to future-proof the Aldi offering in Stirling at the current Springbank Road location. Extending the existing store demonstrates the adaptability of the current location and Aldi's wider commitment to the community in this area who rely upon this store.</p>

- 6.15 LDP Policy 1 sets out a range of criteria relevant to the design of proposal. This notes that development should be designed and sited in relation to the character and amenity of the place where they are located. This has been demonstrated by the range of materials identified in Section 4 of this statement.
- 6.16 Additionally, LDP Policy 1.1 notes that new development should contribute, in a positive manner, to the quality of the surrounding built and natural environment. Policy 9 from the LDP goes on to highlight that new development should take account of the existing area with regards to development type and scale, something that has been carefully considered as part of these proposals. Given the scale and massing proposed for this extension is consistent with the existing building, we consider this policy requirement has been met.
- 6.17 LDP Policy 9.3 states that all new development should incorporate new landscape and planting works appropriate to the local context and to the scale and nature of the development. Additionally landscaping works are proposed as part of this extension, as highlighted within the submitted supporting application plans.
- 6.18 It has therefore been demonstrated that the proposals fully comply with NPF4 Policy 14 and LDP Policies 1, 1.1, 9 and 9.3.

Transport Matters

- 6.19 Policy 13 from the NPF4 and LDP Policy 3.1 set out the requirements for new development proposals which should be incorporated to encourage sustainable transport. Many of these features are already incorporated into the existing development with few changes proposed as part of this development.

- 6.20 This include the retention of existing safe links to local facilities via walking, wheeling and cycling. Connections via public transport (buses) are already provided on Sprinbank Road/Kerse Road adjacent to the existing Aldi store.
- 6.21 . Combining the proposed features outlined above, as well as the existing services provided for sustainable transport, it can be concluded that the proposals comply with Policy 13 of NPF4 and Policy 3.1 of the LDP.

Sustainability Considerations

- 6.22 Turning to sustainability, Policies 1 and 2 of NPF4 centre around the climate and nature crises. These policies state that development proposals should adapt to current and future risks of climate change and should minimise lifestyle greenhouse gas emissions as far as possible. Similarly, Policy 4 from the LDP sets out a range of design standards to ensure that all new development is of a high quality and respects the environment. This policy notes that appropriate measures should be taken to maximise the efficient use of energy and resources and the incorporation of sustainable construction techniques and materials. It also notes that development should be in sustainable locations and should retain access to the public transport network. Transport matters have already been discussed in the preceding heading of this section, where we have demonstrated compliance with the relevant transport policies.
- 6.23 As outlined in Section 2 of this statement, Aldi are continually looking to improve their sustainability credentials and store operation. As part of any new development proposal by Aldi, key areas of improvement are always highlighted to pinpoint improved sustainability measures which can be implemented.
- 6.24 Key themes highlighted by Aldi include minimising energy use, incorporating sustainable construction techniques and utilising sustainable building materials. As part of this development, LED lighting is proposed to be used as the primary lighting source internally and externally. Aldi seek to reduce lighting levels outside of trading hours and power-off internal store lights when the store is unoccupied – thus helping to reduce energy demand and improving the stores sustainability. Furthermore, making use of recycled and secondary aggregates wherever possible is a strong priority for Aldi during the construction process.
- 6.25 Given the above, it has been demonstrated that while the proposals only seek a modest extension to the existing Aldi store, sustainability is at the forefront of the Aldi development model. This supports both NPF4 Policies 1 and 2 and LDP Policy 4.

Flooding and Drainage Matters

- 6.26 Site drainage is covered by LDP Policy 3.2. This policy makes note of the various requirements for new development in regard to sustainable drainage. The policy states that where new development will impact on existing drainage arrangements, measure for the upgrading of said arrangements may be imposed via planning condition. As the Aldi proposals relate to a modest extension to the existing retail store, and the store would be serviced by existing drainage provisions across the application site, it is not considered that there would be any detrimental impact on the current drainage arrangements at the Springbank Road site.
- 6.27 One of the key considerations for this site is the flood risk potential. Both Policy 22 from the NPF4 and Policy 5 from the LDP note that new development will generally not be supported in a flood risk area with a *'medium to high likelihood'*. Both policies set out a range of criteria which should be adhered to, with Policy 5 noting that comprehensive flood risk supporting documentation should be submitted alongside any application in certain cases. As discussed in Section 3 of this statement, areas of the

wider site, including a portions of the car park and servicing yard, have a medium to high likelihood of surface water flooding, however we do not consider that the proposed development represents any increase in risk to the development or other nearby properties.

Other Relevant Considerations

- 6.28 LDP Policy 2 should also be considered in relation to the overarching vision and spatial strategy as set out in the LDP. This policy highlights that retail development proposals will be directed to sites identified for those particular purposes, and outwith allocated sites, the Core Area will be the preferred location for new build development on sites located to, and easily accessible by, major public transport routes. As these proposals relate to a minor extension, in a location which is retail focussed, it is considered that the overarching vision and spatial strategy of the LDP is complied with. Furthermore, as already mentioned in Section 3 of this statement, the site benefits from good public transport connections via Springbank Road/Kerse Road, as well as being within walking distance from the City Centre itself.
- 6.29 Given the policy assessment above in relation to the vision and spatial strategy, it is therefore considered that LDP Policy 2 has been complied with and can be fully satisfied.
- 6.30 Finally, NPF4 Policy 9 is relevant to this site. This policy states that development should encourage, promote and facilitate the reuse of brownfield, vacant and derelict land. While the site itself is not true brownfield land, these proposals involve an increase in efficiency in the use of land. These proposals also align with the overall aim of sustainability which runs throughout NPF4, being an extension to an existing retail store, opposed to the erection of an entirely new building to provide a minimal amount of new floorspace.
- 6.31 As a result of the policy assessment provided in relation to NPF4 Policy 9, it is considered that this policy has been satisfied in relation to these proposals.

7. Retail Policy: Impact

- 7.1 In order to consider matters of retail impact, it is firstly necessary to consider the turnover of the development proposals. This is summarised below, with further detail provided at **Appendix 2**. Furthermore, **Appendix 3** provides a retail plan, including the proposed store catchment, allocated centres and other retailers present.

Table 1: Turnover of the proposals

- 7.2 Table 1 introduces the proposed development and calculates the foodstore turnover in accordance with Aldi's national average levels. It confirms the proposed extension to sales floorspace of the supermarket as 377sqm. The floorspace split between convenience and comparison goods equates to 80/20, resulting in 302 sqm in respect of the former and 75 sqm for the latter.
- 7.3 The sales density used within the analysis is sourced from Global Data and are based on 2021 trading figures, but grown to 2023 prices, which is the price year used for the assessment. This provides a sales density figure for the proposals, once grown to the test year, of £12,235 per sqm for convenience goods, whilst the figure for comparison items is £8,570 per sqm.
- 7.4 The proposed floorspace would therefore generate a turnover of **£3.69m** for convenience sales and **£0.65m** for comparison sales per annum. It is expected that 90% of this turnover will be as a result of expenditure generated by the catchment area, the remainder coming from outside the catchment. As such, convenience turnover generated from the catchment area is estimated as **£3.32m**, with a comparison turnover from the catchment of **£0.58m** per annum.

Table 2: Trade Diversions

- 7.5 The anticipated trade diversions for the Aldi store are assessed within Table 2 of the retail assessment.
- 7.6 The percentage diversion that is envisaged from a specific location is detailed in column 2 as a proportion of the proposed store's turnover from the catchment. Column 3 then displays this percentage as a monetary value. The impact of the trade diversion on the various locations can therefore be calculated as a percentage of each location's total existing turnover, shown in column 4.
- 7.7 In order to determine where trade is anticipated to be derived from, it is firstly important to appreciate the nature of the food shopping retail market and also the type of retailers Aldi competes most actively with. It is therefore relevant to recognise the well-established characteristics of convenience shopping, whereby 'like competes with like' and accordingly, that the proposed store will compete directly with other major grocery store operators. This is consistent with the gains in market share that Aldi is achieving, as widely reported throughout national press coverage in recent years.
- 7.8 The principal convenience trade diversions are therefore summarised in the table below:

Table 2: Aldi Trade Diversions

Retail Unit	Diversion (%)	Diversion (£m)	Impact (%)
Stirling City Centre			
Convenience (Inc M+S)	2	0.07	0.9
Waitrose	2	0.07	0.2
Iceland	5	0.17	4.8
Lidl	20	0.66	5.6
Others	0	0.00	0.0
Total		0.96	1.5
Out of Centre Shops			
Sainsburys	10	0.33	0.6
Tesco	15	0.50	1.5
Morrisons	20	0.66	1.5
Aldi	0	0.00	0.0
Farmfoods	6	0.20	6.7
Lidl, Weaver Row	10	0.33	3.8
Local Shops	0	0.00	0.0
B+M	0	0.00	0.0
Other (locations outwith catchment area)			
	10	0.33	

NB numbers may not add due to rounding

- 7.10 The assumptions within Table 2 are based on the well-established retailing principle that *'like competes with like'*. This means that when shoppers are considering which retail unit they are going to visit, they will typically choose between retail offers that are similar in terms of scale and type. For example, a consumer that typically carries out the majority of their food shopping at local shops would be less likely to swap that for a visit to the new store. Alternatively, a shopper that mainly uses one of the traditional 'Big 4' supermarket brands would be more likely to switch loyalty given the comparability of the offers. This is also backed up by the recent changes in market performance for the 'Big 4', where Aldi is currently benefiting from a change in consumer shopping patterns, including an increasing switch to discounters, and expanding significantly across the UK as a result of this.
- 7.11 It is also considered that the proposed extension is unlikely to have any significant impact on shopping patterns as it is designed to improve the range and choice for existing shoppers rather than provide a new retail proposal not currently available. It is therefore unlikely to increase the number of shoppers from the local area but increase their existing spend in the store.
- 7.12 Given the existing limited provision within the catchment, we have identified that there will be very minimal impact on any centre within the catchment; the largest being a 1.5% diversion within Stirling City Centre.
- 7.13 Furthermore, the very limited trade diversions would be on larger scale national operators and would in no way be considered a significant adverse impact.

- 7.14 At these impact levels identified, the performance of the national stores would not be significantly affected, as it is important to note that they do not need to perform at national average UK levels to remain viable. This has been confirmed in a number of local authority retail studies in recent years.
- 7.15 Clearly, at the levels set out within the tables, the trade diversions would result in only minor levels of impact and as a result, it is not anticipated that there will be any overall detrimental impact to the vitality and viability of these areas. This is supported by the healthchecks outlined in Section 9 of this report which demonstrates the existing centres in the catchment are performing well.
- 7.16 It should also be noted that during site visits and health checks undertaken as part of these proposals, there was evidence of overtrading at most large retailers within the town. This indicates that stores are likely to be performing at higher than national average levels, further reading any potential impact which these proposals may have.

Summary

- 7.17 The above has demonstrated that the impact of the proposed development on existing centres afforded policy protection would not be significantly adverse.
- 7.18 As such, the proposed development would not negatively impact on the vitality or viability of the protected centres within the catchment and therefore complies with the criteria set out in Policy 27 of NPF4 and Policy 2.7 of the LDP. Furthermore, this proposal cannot be located within or adjacent to any existing centres given that the sequential assessment (set out within Section 8 and **Appendix 4**) demonstrates that there were no available, suitable, and viable site opportunities within the catchment area.

8. Retail Policy: Sequential Considerations

- 8.1 This section considers the sequential test as required by criteria b)ii of **Policy 27: City, Town, Local and Commercial Centres** of NPF4 and Policy 2.7 of the LDP, given that the development is located out with an allocated centre.
- 8.2 At the outset, we consider it important to reiterate that these proposals relate to a very modest extension to an existing retail store, which is designed to improve the shopping experience for customers. Therefore, whilst it occupies an edge of centre location and is therefore required to satisfy the sequential test under NPF4 and LDP policy, the delivery of an extension to an existing store is considered significantly more sustainable than delivery of a new store elsewhere. Given the requirements of NPF4 to consider the development plan as a whole, matters of sustainability should be given due weight in the determination of this application. Nevertheless, we consider sequential matters below.

Scale and Form of Development, Catchment Area and Centres Assessed

- 8.3 Whilst both NPF4 and the LDP are silent on the appropriate area of search for sequentially superior sites, a conventional approach is to consider the extent of the catchment area likely to be served by the proposal and then to identify alternative sites, located in sequentially preferable locations which serve an **equivalent catchment**, and which could accommodate the scale and form of development proposed. (**AY Emphasis**). In the context of these proposals being edge of centre, only in-centre opportunities require to be considered.

Scale and Form of Development

- 8.4 The operation of a LAD discounter (such as Aldi) requires a standard store format with the layout allowing the optimal interaction between the warehouse, sales floor, servicing and access arrangements. Such a layout is very similar across their entire store portfolio. This layout cannot be achieved within an existing enclosed shopping centre where the form of retail units are already defined, requiring a LAD discounter to move away from their standardised concept store model and using floorspace which is not designed with 'deep discount' in mind. This means that the efficiencies and cost savings that come with a standardised store model cannot be accommodated, and therefore stores must achieve significantly increased turnover to account for increased operating costs.
- 8.5 This position invariable means that locating within an enclosed shopping centre is unviable for any LAD business and these sites can be discounted on this basis of viability and therefore suitability.
- 8.6 In order to demonstrate this further, within Scotland Aldi operate over 100 stores, with only one present in a large shopping mall at Cameron Toll, Edinburgh.
- 8.7 In the context of these proposals which relate to an extension to an existing store, we have considered any site which could potentially accommodate a new, relocated store rather than simply the extension floorspace. This is because delivery of only the extension floorspace away from the existing store would not be a viable option for any retailer to undertake.
- 8.8 In this instance, the scale and form of retail development is a discount foodstore of 1,871 sqm GIA (1,365 sqm net sales) alongside requisite customer car parking (144 customer spaces within the retail park), vehicular access roads, servicing area, and associated hard and soft landscaping. This is located on a site of 0.97 hectares (2.39 acres). It is noted that this site is not a common layout for an Aldi operation given that the wider retail park includes a number of other retailers and its associated car parking. Typically, a site of at least 2.0 acres with space for at least 120 cars would be required for the

delivery of a new Aldi store and it is on this basis that the sequential assessment has been undertaken given the requirement that if Aldi were to relocate, any site would need to accommodate a full new foodstore. Accordingly, it is necessary to define an area of search for sequentially preferable sites based purely on the specific trading characteristics of a retail development of this size.

8.9 Whilst this is the case for these proposals, there is a minimum store size and associated development which these proposals require, and it is these characteristics have been used as the basis for this sequential assessment. This comprises:

- A Gross External area of 2,137sq.m, allowing for a net sales area of 1,356 sq.m, of which 1,085 sq.m comprises convenience sales.
- Customer Parking of at least 105 spaces.
- A minimum site area of 2.0 acres (0.8ha).
- Prominent location that can be served by an HGV.
- Delivery of a store across a single floorplate with sales area, warehousing and delivery access being linked together.
- Level customer access to the store.

Primary Catchment Area

8.10 A discount foodstores limited size and offer provides a strong indication that its catchment area will not be particularly extensive and is generally unlikely to extend significantly beyond a 5-minute drivetime from the proposed store, particularly in populous areas. This can vary depending on the physical location of the store and can in some cases extend to 15 minutes. Smaller catchments are typical where the Aldi foodstore is located within urban areas, such as this case. We therefore consider that a 5 minute drive-time catchment area is appropriate.

Centres Assessed

8.11 Within the 5-minute drive of the planning application site there is only Stirling City Centre. This site is highlighted on the plans provided at **Appendix 4** of this statement.

8.12 We note that both local and national planning policy state it is appropriate to assess whether there are any sequentially preferable alternative sites within any of the centres identified above as part of the sequential test's application. Case law also identifies that any sequential assessment should consider sites which would serve a similar catchment to that of the proposed site. In this case, we consider that locating a store in any of these local centres would not be appropriate on that basis that the local centres are all located to the edge of the catchment, and any store in these locations would serve a significantly different catchment to that anticipated by these proposals. They would therefore not serve an equivalent catchment as the application site

Summary (Scale and Form of Development, Catchment Area and Centres Assessed)

8.13 Drawing the above together, in this case a logical area of search for sequentially preferable sites should encompass 'in-centre' opportunities within Glenrothes town centre. Within the defined area of search, candidate sites must be able to accommodate (as a minimum) an Aldi discount foodstore and

its associated car parking, access arrangements and hard and soft landscaping – as this is the scale and form of development that is proposed. A site will be considered sequentially preferable where it is 'suitable' and 'available' which necessarily includes consideration of deliverability/viability.

- 8.14 Whilst in this case the total site area required is 2.0 acres it is necessary for applicants and Local Planning Authorities to demonstrate 'flexibility' in their approach, in-line both NPF4 and the LDP. This can involve reducing the site area for testing purposes to one which is commensurate purely with the scale and form of the 'main town centre' use floorspace proposed and its essential supporting infrastructure. This policy requirement and relevant legal / appeal precedents are examined in detail under the following headings.

The Requirement to Demonstrate Flexibility

- 8.15 Policy 27 of NPF4 requires applicants to demonstrate 'flexibility' on issues such as format and scale when considering sites in, or on the edge, of existing centres as part of applying the sequential test. Whilst no indication as to what degree of flexibility is required is contained within NPF4, we consider that there are a number of court bases which provide guidance.
- 8.16 The 'Rushden Lakes' Secretary of State ('SoS') Call-in decision¹ provides a suggestion of how flexibility could be dealt with. The Inspector (Paragraph 8.49) highlights that 'flexibility' matters including *"flexibility in a business model, use of multi-level stores, flexible car parking requirements or arrangements, innovative servicing solutions and a willingness to depart from standard formats"*. In Paragraph 15 of the decision letter, the SoS agrees with the Inspector that these are issues of principal relevance in demonstrating flexibility.
- 8.17 This important Call-in decision has also provided clarity on whether there remains a requirement to consider 'disaggregation'² when demonstrating flexibility as part of the sequential test. The Inspector is quite clear at Paragraph 8.47 of his report that *"there is no longer any such requirement stated in the NPPF"* and that *"had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF"*. In Paragraph 16 of the decision letter, the SoS agrees with the Inspector that there is no requirement to consider disaggregation when applying the sequential test. This approach has been followed in subsequent cases (see below).
- 8.18 A final matter of seminal importance when considering 'flexibility' and indeed interpreting the sequential test more widely is the Tesco Stores Ltd v Dundee City Council ('Dundee') Supreme Court Decision (2012). In summary, this establishes that:
- "if a site is not suitable for the commercial requirements of the developer in question then it is not a 'suitable' site for the purposes of the sequential approach; and,*
- that in terms of the size of the alternative site, provided that the applicant has demonstrated 'flexibility' with regards to format and scale (explained in the paragraph above), the question is then whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to physically fit the alternative site."*
- 8.19 The implications of the Dundee decision were also considered by the SoS as part of the 'Rushden Lakes' Call-in decision. In Paragraph 15 of the decision letter, the SoS agrees with the Inspector that the sequential test relates entirely to the application proposal and whether it can be accommodated on an actual alternative site.

¹ Land Adjacent Skew Bridge Ski Slope, Northampton Road, Rushden; Inspectorate Ref. APP/G2815/V/12/2190175; 11 June 2014.

² Consideration being given to the separation of a retail scheme across a number of sequentially superior sites.

- 8.20 Two further relatively recent High Court decisions³ have also considered (inter alia) the sequential test and confirmed the importance of demonstrating flexibility on issues such as format and scale. A developer's own intentions may be considered and have a bearing – for instance when considering what demand a proposal is intended to meet. However, the sequential approach should be 'operator blind' and not become a self-fulfilling activity and divorced from the public interest.
- 8.21 Specifically, in *Aldergate Properties Limited v Mansfield District Council* [2016] EWHC 1670 [Admin] the judgement emphasised that in considering how to apply 'suitability' and 'availability' the general meaning would be that a site should be "...*'suitable' and 'available' for the broad type of development which is proposed in the application by approximate size, type and range of goods. This incorporates the requirement for flexibility in [24] NPPF, and excludes, generally, the identify and personal or corporate attitudes of an individual retailer....*" (Paragraph 35 of Judgement).
- 8.22 Some have suggested that the effect of the [Mansfield] judgment has been to always render the identity of an applicant irrelevant in the application of the sequential test, and that sites should be considered for their suitability and availability for the "broad type of development" proposed (with "broad type of development" meaning any retailer that sells primarily food and convenience goods).
- 8.23 This approach could mean that the sequential test must always fail in any situation where any more centrally located sites (irrespective of size) were available to accommodate any form of convenience retailing. That would represent a misapplication of policy and misinterpretation of the judgement.
- 8.24 Instead, the judgment states that the identity of an applicant is not "generally" relevant but acknowledges also that "there are instances where identity may matter". Those "instances" are not exhaustively defined. Moreover, it is reasonable to take the position that "broad type of retailer" may comprise a LAD operator rather than any foodstore or convenience store, this is particularly in the context of the *Tesco Stores Limited v Dundee City Council* [2012] UKSC 13 Supreme Court Judgment, which is clear that "*the issue of suitability is directed to the developer's proposals, not some alternative scheme*". We conclude that it remains robust to apply the sequential test on the basis that there is only limited scope for LAD retailers to be flexible in the configuration of their floorspace.
- 8.25 In summary, whilst it is necessary for applicants to demonstrate 'flexibility' on issues such as format and scale when applying the sequential test, it is clear that there is no requirement to consider 'disaggregation' nor to explore changes that would materially alter the application proposal such that it no longer met commercial requirements (i.e. a material reduction in size). These matters have been considered as part of numerous 'call-in' and appeal decisions⁴ and in which the SoS / Planning Inspectorate clearly draw heavily on the key caselaw referenced in this section when interpreting the sequential test (and specifically the requirement for disaggregation).
- 8.26 Whilst these cases relate to English planning legislation, we consider they help provide further guidance on the approach that should be taken regarding sequential assessments and the flexibility which should be applied.

Flexibility in the Context of the Application Proposals

- 8.27 Aldi recognises the need for 'flexibility' in promoting sites for development and the retailer pursues non-standard stores where this will assist in meeting planning policy requirements. When considering the scope for flexibility, however, the inherent nature of Aldi's operation as a 'deep discount' food

³ *Warners Retail (Moreton) Ltd v Cotswold District Council (2016)* and *Aldergate Properties Ltd v Mansfield District Council (2016)*.

⁴ See for example: APP/P0119/V/17/3170627 - The Mall, Cribbs Causeway, Patchway, South Gloucestershire BS34 5DG (October 2018); APP/T3725/W/18/3204311 - Leamington Shopping Park, Tachbrook Park Drive, Warwick, CV34 6HR (March 2019); and, APP/R0660/V/17/3179610, APP/R0660/V/17/3179605 and APP/R0660/V/17/3179609 - Land at Earl Road, Handforth Dean, Cheshire, SK9 3RW (June 2019).

retailer must be borne in mind, alongside that this is an extension to an existing facility. Accordingly, there are a number of key areas where it is not possible to alter the core design of the store; as to do so would undermine the operational efficiency of the business model and hence its viability.

8.28 The fundamental requirements of a modern Aldi foodstores design and layout are therefore as follows:

- **Retail Sales Area:** This is the most important aspect of store building design. A circa 1,105 sq. m sales area is required, and the dimensions of the retail area are determined by the need to ensure adequate product display space is provided. The rectangular shape of the retail sales area is also specifically designed to enable efficient transfer of products. In view of its critical importance to the trading and operational success of Aldi's business, and that of any other LAD retailer, the size and proportions (shape) of net retail floorspace is one area where it is not possible for Aldi to depart from their core design, as to do so would undermine trading viability. Such a configuration is coincidentally an optimum solution to enable shoppers to shop and cannot reasonably be reduced.
- **Storage and Ancillary Non-Retail Floorspace:** Where the size and shape of a particular site requires reconfiguration, Aldi can exhibit flexibility, such as compromising service and storage facilities. However, the foodstore must be capable of being serviced by a HGV delivery vehicle and the site layout must enable the delivery vehicle to enter and leave in forward gear, and for the vehicle to be able to dock correctly and safely in the purpose-built delivery area of the store (a dock-leveller).
- **Customer Car Parking:** Aldi foodstores are required to have immediately adjacent surface level car parking facilities. This is because an Aldi foodstores primary function is to cater for 'bulk' food shopping needs and therefore very many customers will be visiting to undertake a 'weekly' shopping trip, involving several heavy shopping bags. Customers may also be visiting to purchase a product from Aldi's non-food 'special buy' range which could be large / heavy and therefore unmanageable on foot. Accordingly, it is a pre-requisite that most customers have the opportunity to take their goods home via private car, irrespective of the accessibility of the store location via sustainable modes of transport, for those undertaking smaller basket shopping.

8.29 In light of the above, with regards the application of 'flexibility' to the planning application scheme when applying the sequential test, the following is proposed:

- The net sales area and gross external floor area of the store should be similar to that as proposed by this application, being a minimum of 1,315 sq.m and 1,883 sq.m respectively.
- The 120 customer car parking spaces could be reduced to around 105 spaces – which is Aldi's minimum requirement for their current foodstore format.

8.30 Based on the above identified areas where 'flexibility' can be demonstrated in relation to this specific scheme, it is considered that a site area requirement could be reduced to **0.7ha** (reduction of 45%), which is regarded as the minimum realistically necessary to accommodate a discount foodstore of 1,883 sq. m GEA and its supporting site infrastructure (i.e. customer car parking, vehicular access/egress, servicing area, pedestrian circulation space and basic landscaping).

8.31 In summary, measures have evidently been taken in the design of the scheme to maximise 'flexibility' in terms of the scale and form of foodstore development proposed. Thus, the applicants are clearly demonstrating 'flexibility'.

The Sequential Assessment

- 8.32 In assessing sequential sites, we have taken cognisance of three key considerations which are advocated by NPF4 as being relevant, namely:
- **Availability** – whether the site is available in a reasonable period of time, taking into account the realities of property development and delivery.
 - **Suitability** – whether a site/property is suitable in view of its location, configuration, profile, size, accessibility, servicing and other physical/amenity considerations.
 - **Viability** – the extent to which a site /property offers a genuine and viable opportunity for Aldi. Viability can be considered in view of matters associated with financial considerations associated with development of a site, or conversion of an existing unit, or its ability to offer a genuine and viable trading opportunity for Aldi.
- 8.33 As the site occupies an “edge of centre” location, sequentially preferable sites, within town, district and commercial centres in the catchment area require to be assessed.
- 8.34 This sequential analysis has been completed following a visit on foot of each area to look for opportunities. Where necessary, it has also been informed by informal discussion with the agents and relevant searches of available opportunities on property search engines, such as Estates Gazette and The Scottish Property Network. We have also reviewed available properties as listed on Costar, which does not identify any properties in a sequentially preferable location as at the time of writing.
- 8.35 Our assessment of these sites is set out at **Appendix 4**. Please refer here for fuller detail.
- 8.36 In conclusion, our assessment has not identified any sequentially preferable opportunities, in accordance with the sequential approach set out in the Development Plan and NPF4 and by considering location where flexibility would be required. This is mostly due to a lack of sites of an available size suitable for an Aldi store. As such, the planning application satisfies the requirements of planning policy.

9. Retail Policy: Town Centre Health Checks

- 9.1 In order to ensure that the development proposals will not undermine the vitality and viability of protected retail centres within the catchment, town centre health checks were completed to review the network of centres.
- 9.2 The centres where health checks were undertaken were selected based on the Stirling Local Development Plan (2018) and subsequent Settlement Profiles.
- 9.3 The centres that fall within the proposed store catchment which are considered to be of most relevance to these proposals comprise Stirling City Centre.
- 9.4 It is typically accepted that there are key indicators that are to be used when determining the vitality and viability of a centre. This includes:
- Pedestrian flow;
 - Space in use for different town centre functions and how it has changed;
 - Retailer representation and intentions (national multiples and independents);
 - Vacancy rates; and
 - Physical structure of the centre including opportunities and constraints, and its accessibility.
- 9.5 This exercise has been completed in accordance with this guidance. The purpose of this was to provide a qualitative assessment of the strengths and weaknesses of the area's various centres from which their vitality and viability could be determined.
- 9.6 These health checks were completed on foot in September 2023 on a weekday mid-morning.

Stirling City Centre

- 9.7 Stirling City Centre is a large centre located to the north-west and west of the Aldi site at Springbank Road. The centre runs in a general north-west/south-east direction and north/south direction. The centre comprises two main aspects, the historic old town and the more modern City Centre. Beginning at Stirling Castle, bounded by The Back Walk and Ballengeich Pass around Castlehill to the north-west, the centre then runs to the south-east terminating at Burghmuir Retail Park, before heading further east to encompass Phoenix Industrial Estate. From here, the centre boundary runs north along the River Forth. To the north, the centre is bounded by the crossroads between Viewfield Place and Goosecroft Road, before running south to Baker Street in the old town.
- 9.8 The modern City Centre itself generally comprises the Thistles Shopping Centre, with retail parades along Murray Place, Port Street and King Street. A small retail parade is also located to the east of Dumbarton Road which includes a number of retail units. Within the old town, the main shopping thoroughfares Baker Street and Spittal Street. To the south east, Burghmuir Retail Park is located, with a small retail and leisure offering also provided along Forthside Way in the north-east.
- 9.9 The Thistles Shopping Centre comprises a good range of national retailers, with a Sainsbury's Local, M&S, Costa Coffee, Greggs, Subway, Next, Poundland and JD Sports amongst others. Elsewhere, Burghmuir Retail Park also benefits from a Waitrose and TK Maxx, with Iceland located to the east of Port Street.
- 9.10 The centre is surrounded by a mix of uses, including retail, residential, industrial and business uses. To the south and south-west are large residential developments, with commercial and industrial uses

located to the north and north-east of the centre. This includes the Aldi foodstore. To the west of the centre, open farmland is located.

- 9.11 As with most City Centres, Stirling comprises a vast mix of multinational and independent retailers, including the retailers already mentioned above. In addition, Boots the Chemist, McDonalds, Caffè Nero, JD Wetherspoons, Nando's, Premier Inn, Travelodge, Sports Direct, New Look, Pizza Express, Superdrug, Lidl and B&M Home Store with garden centre and an array of other large chains. Additionally, the centre has many smaller stores and independent businesses throughout. Based on the surrounding area and other provision in close proximity, we believe the centre provides the primary draw for residents in the Aldi catchment, given its size and mix of uses present.
- 9.12 Due to the presence of large multinational stores close within the, as well as the Lidl foodstore aforementioned, it is likely that the centre also draws trade from those who reside beyond Aldi's catchment completing linked trips. This will likely include those travelling from Bridge of Allan and Bannockburn, particularly given the limited choice of foodstores in these locations.
- 9.13 Stirling City Centre also benefits from a public library, a bus interchange, railway station, a Costa Coffee drive thru, a number of gift shops, public houses, doctors and dental surgery's, car garages and tourist attractions. In addition, Stirling Arcade features a number of independent shops, boutiques, cafés and a restaurant and bar.
- 9.14 The boundary of the centre is identified by the dark blue/purple line on the extract below from Stirling Local Development Plan 2018. Below this, a number of photos from the centre are included.

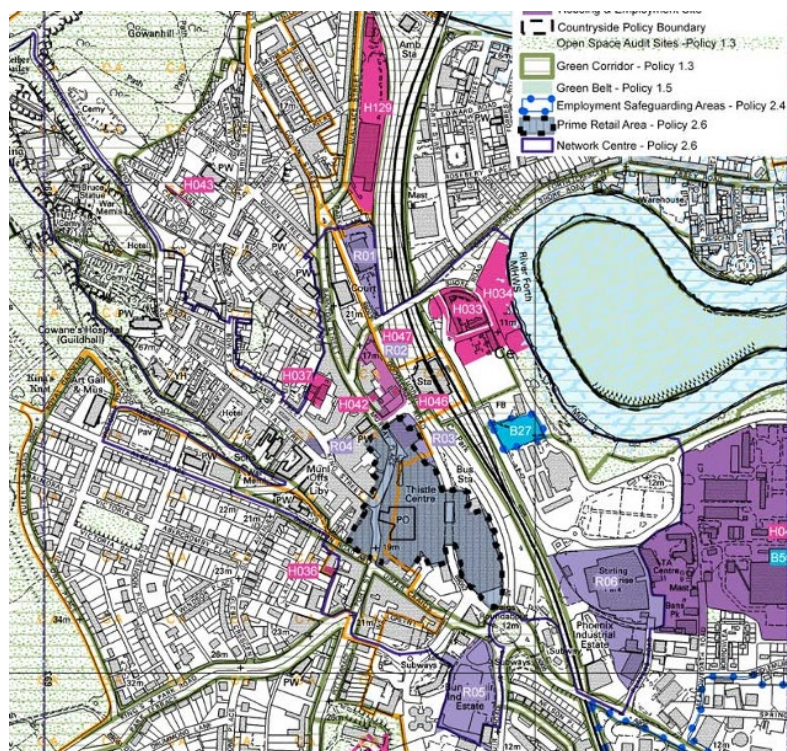
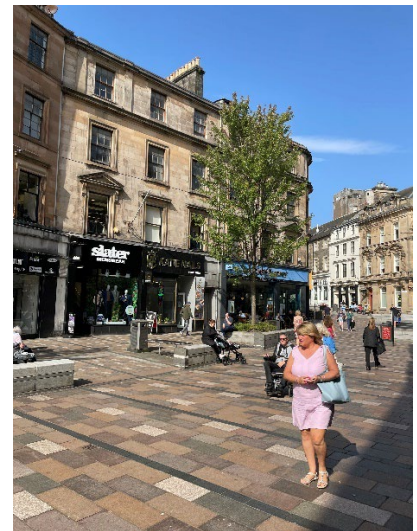
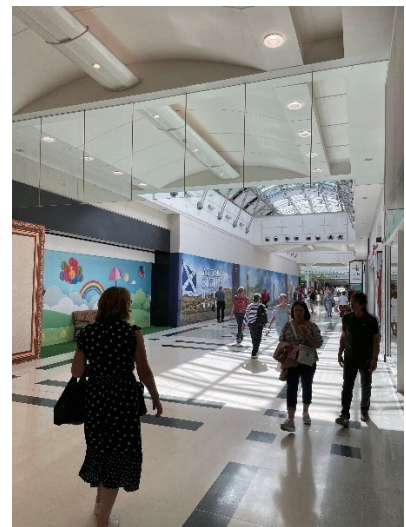


Figure 4: Extract from Stirling LDP (2018) Settlement Profile showing City Centre boundary of Stirling

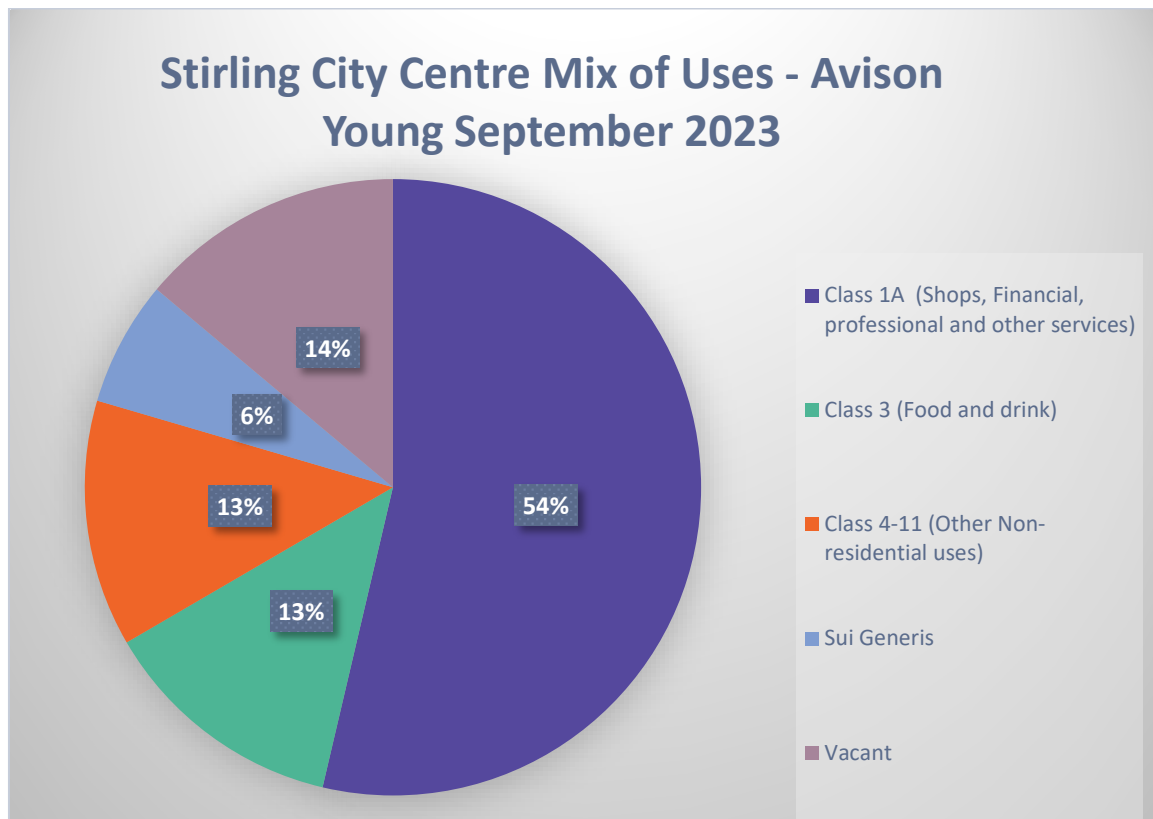


Photos of Stirling City Centre – September 2023

Mix of Uses

9.15 The Avison Young survey was undertaken in September 2023 on foot to review the existing mix of uses present. This exercise found that there are currently 518 no. units within the centre as defined by the LDP boundary. This excludes residential uses for clarity.

9.16 The findings of the survey are presented in the pie chart below:



9.17 The health check identified that Class 1A (shops, financial, professional and other services) is the dominant use class, with 53.7% of units involved in this form of activity. The survey found there are 278 no. units of this type in the City Centre.

9.18 The pie chart identifies that Class 3 (food and drink) uses occupy 67 no. units within the centre (12.9%), which included a good mix of multinational chains as well as independent restaurants and cafés. Class 4-11 (other non-residential uses) forms the same percentage (12.9%) of the activity in the City Centre, comprising 67 no. units of the City Centre total. This included a number of hotels and guest houses, offices, leisure outlets and industrial uses. Other uses noted from the survey included 34 no. Sui Generis units, comprising 6.6% of the total, of which public houses, hot food takeaways and betting offices were the majority occupier of this type of unit.

Vacancy Rates

9.19 Based on the survey in September 2023, there were 72 no. vacant units (13.9%) which is somewhat lower than the current Scottish national average of 15.9% (Scottish Retail Consortium and Local Data Company, 2023). Prominent vacancies in the City Centre included the former British Home Stores building within the Thistles Shopping Centre/Murray Place which has three retail floors, 3 no. units within the shopping centre side by side and a number of vacancies within the Stirling Arcade which appeared to be greatly underused. Additionally, a cluster of vacant units were noted on Barton Street, although it should be noted that a number of these were under construction for new openings. Many vacant units within the centre are currently being marketed including, 1 no. vacant restaurant at the retail and leisure complex at Forthside Way, a large Place of Worship at Albert Street/Dumbarton Road and the New Look unit on Port Street which is currently still occupied.

9.20 It should be noted that other vacant units are dotted around the City Centre and not isolated to one location. Furthermore, these vacancies tend to comprise small singular retail units. A number of

previously vacant units (as identified on earlier surveys) have since become occupied in the centre, while others are under construction for new store openings. This demonstrates a relatively good resistance in the City Centre and demonstrates that there is a strong draw to Stirling City Centre.

- 9.21 It is also considered that while there are a number of vacant units within the Thistles Shopping Centre, it can be concluded that the centre is still performing well, with a number of the vacancies resulting as a loss of national chains falling into administration, thus, not solely isolated to Stirling.

Accessibility

- 9.22 Stirling City Centre benefits from very good public transport links, including national bus links via the bus interchange to Aberdeen, Dundee, Perth, Glasgow and Edinburgh regularly each day. Additionally, a range of local services are provided to Alloa, Callandar, Auchterarder, Throsk, Cowie, Forthside, Falkirk, Raploch, Grahamston, Westquarter, Causewayhead, Clackmannan, University of Stirling, St Ninians and Bannockburn. Services to these locations run frequently each day. Bus stops are located throughout the City Centre, with the bus interchange acting as an anchor at Goosefort Road. This provides good accessibility to the range of services for those using public transport.
- 9.23 Stirling City Centre also benefits from a large railway station, with services operated by Scotrail, LNER and the Caledonian Sleeper to a number of locations. These include, Alloa, Dunblane, Glasgow, Edinburgh, Inverness and London. It is noted that these services will not regularly be used by those travelling to Stirling to complete shopping trips.
- 9.24 For visitors arriving by car, there is a large car park adjacent to the retail and leisure complex to the east of the Barrack's Conference Centre to the east, a smaller car park adjacent to the railway station and a large carpark within the Thistles Shopping Centre. In addition, a modest car park is provided for customers of Lidl to the south-east and for the Burghmuir Retail Park to the south.
- 9.25 Pedestrian movement throughout the centre was noted to be good with pavements along both sides of Murray Place, King Street, Baker Street, Spittal Street, Forthside Way, Players Road and Dunbarton Road. A pedestrian subway is provided for safe crossing at the Wellgreen Road roundabout to the north of Burghmuir Retail Park. Additionally, it is noted that a large portion of Port Street is completely pedestrianised allowing access to the Thistles Shopping Centre. There are plenty of opportunities for safe crossing throughout the City Centre, with pedestrian crossings being provided along each of the roads identified above.

Other Vitality Indicators

- 9.26 On the day of the survey, it was noted that Murray Place, Port Street and King Street were the busiest areas of the City Centre, with a variety of demographics using the services on offer within the centre. It was also noted that the old town, particularly Baker Street, Spittal Street and Castlehill were very busy with tourists.
- 9.27 It was noted on the day of the survey that both the M&S and Waitrose supermarkets were busy and appeared to be performing well, suggesting an element of overtrading may be taking place. Additionally, Lidl and Iceland were also very busy. Whilst not located within the City Centre boundaries there was also evidence of overtrading within the other retailers present within the city (Tesco).
- 9.28 Forthside Way was relatively quiet on the day of the survey; however, given its location at the periphery of the City Centre boundary, it is unlikely to be as busy as the centre itself. Additionally, this area is anchored by a large budget hotel and cinema, and as such, it is considered that this area will

draw better trade in the evening and weekends, rather than a weekday morning when the survey was undertaken.

- 9.29 The centre itself comprises a broad range of properties with a mix of ages and uses, with the modern aspects of the City Centre buildings encompassing a range of ages and styles, while the Thistles Shopping Centre dates to the late 1970s. Additionally, the Stirling Arcade was first opened in the 19th Century. Stirling's old town area, buildings date back as far as the 14th Century in some parts, with the majority of buildings in this area dating back to the 17th and 18th Centuries.
- 9.30 It was noted that there was a good variety of multinational and independent retailers, alongside other relevant services for a settlement of this scale providing a good choice for visitors and local alike. Stirling City Centre is serviced by multiple supermarkets, pharmacies and independent retailers. In terms of the national multiple retailers which are present, these include a Dominos, Mountain Warehouse, Boots the Chemist, Beefeater Restaurant, Papa Johns, Vue Cinema, Pure Gym, alongside the Sainsbury's Local, TK Maxx, Lidl and B&M Home Store with garden centre already mentioned. Additionally, there are a number of professional services which serve the City Centre, comprising lawyers, accountants, estate agents, opticians and undertakers.
- 9.31 In light of the nature of the offer present within Stirling and its performance, it is clear that the centre would not be significantly impacted by the development proposals at Springbank Road, as examined within Section 7 of this report.

Summary of Stirling City Centre

- 9.32 Stirling City Centre provides a wide range of larger and local shops and services for the resident community as well as those living outwith in the surrounding towns and areas. It includes a vast set of occupiers including national retailers and independents alike.
- 9.33 Based on the nature of retail offer available and the type proposed by Aldi at Springbank Road, it is clear that the proposed minor extension to the Class 1A foodstore would have very limited impact on its vitality and viability of Stirling City Centre.

10. Conclusions

- 10.1 Avison Young have prepared this planning statement in support of the proposed minor extension to the existing Aldi Class 1A foodstore at Springbank Road, Stirling. This statement has reviewed the site context, the proposals, the development plan and material considerations.
- 10.2 In summary, the following can be concluded:
- The development proposals represent a significant further investment in Stirling by Aldi, which will bring a much-improved offer for local residents, ensuring sustainable shopping provisions for residents within the Stirling area and further afield.
 - The nature and minor scale of new retail offer proposed is intended to serve will not lead to any significant adverse impact on the vitality and viability of any protected centres within the catchment.
 - The principle of retail development is supported by the development plan as the site lies within an allocated local centre, where retail is supported by NPF4. In this situation, there is no requirement to undertake a sequential assessment or provide a town centre first assessment.
 - Furthermore, the development complies with other relevant policies within the development plan relating to sustainability and accessibility.
- 10.3 As a result of these findings, we believe that the proposals accord with the development plan, including NPF4, which indicates that the planning application should be supported in due course.

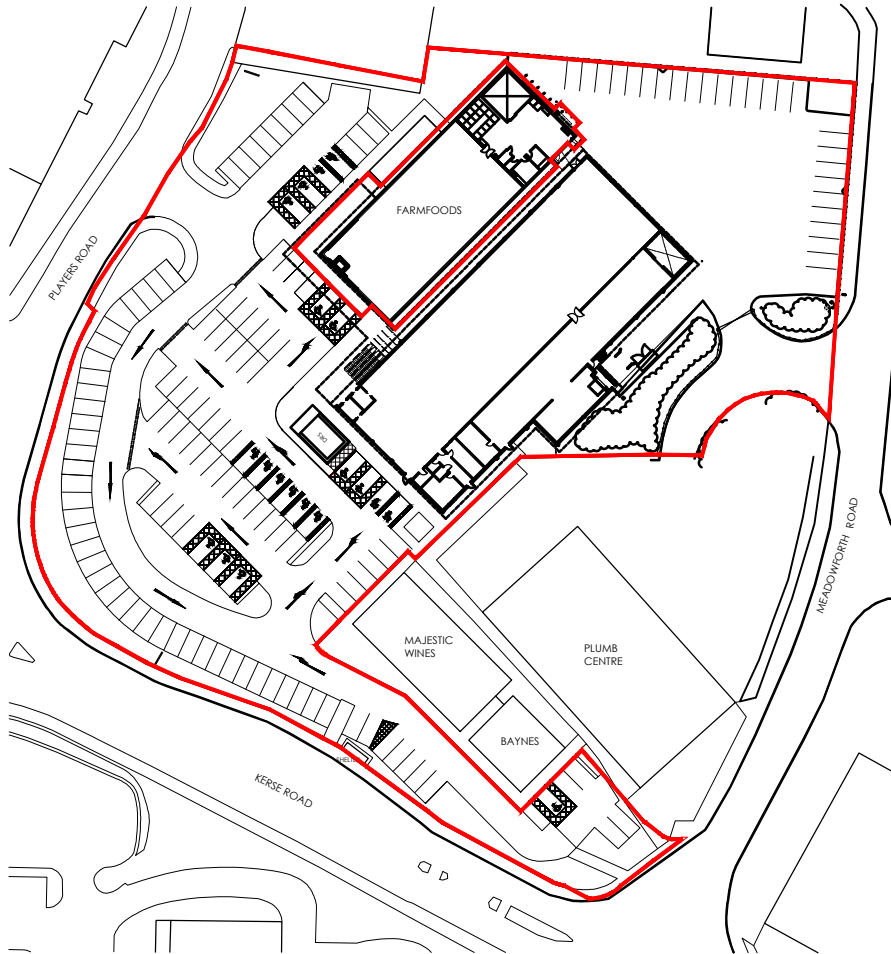
Appendix 1

Location Plan



REV	DATE	DESCRIPTION	DRW	CHK
P01	2023-08-04	FIRST ISSUE.	LAV	NM

TOTAL SITE AREA = 9,655m² / 2.39 Acres



Client
Aldi Stores Ltd.



Drawing Title
SITE LOCATION PLAN

Project Title
Aldi - STIRLING

Project Address
**2B SPRINGBANK ROAD
STIRLING, FK7 7WR**

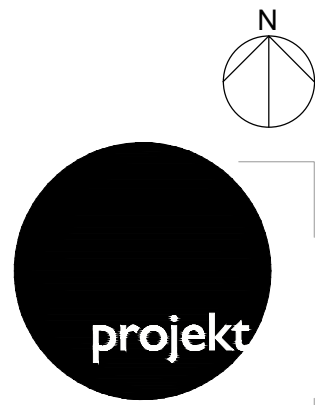
Job No.	Originator	Zone	Level	Type	Role
79-E0514 PA		XX	00	DR	A
Classification	Drawing No.	Suitability	Revision		
PM_40_50_21-0001		S4	P01		

Drawn	Checked	Date	Scale	Size
LAV	NM	2023-07-31	1:1250	A4

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Appendix 2

Retail Impact Assessment Tables

TABLE 1 - TURNOVER OF ALDI EXTENSION PROPOSALS 2026

Scale of Proposals:	(sq m)
Net Sales Area	377
Convenience Goods Sales Area (sq m)	302
Comparison Goods Sales Area (sq m)	75
Turnover*:	
Convenience Sales Density (£ per sqm)	12,235
Comparison Sales Density (£ per sqm)	8,570
Convenience Turnover (£m)	3.69
Comparison Turnover (£m)	0.65
Convenience Turnover from Catchment (£m)**	3.32
Comparison Turnover from Catchment (£m)**	0.58
Notes:	
*Sales Convenience / Comparison split based on 80% / 20% national average	
**Turnover based on 90% from Catchment	

ALDI Stores Ltd.
 Stirling
 October 2023

TABLE 2 - TRADE DIVERSIONS - ALDI PROPOSALS

	Diversion (%)	Diversion (£m)	Impact (%)
Catchment Area			
<i>Stirling City Centre</i>			
Convenience (Inc M+S)	2	0.07	0.9
Waitrose	2	0.07	0.2
Iceland	5	0.17	4.8
Lidl	20	0.66	5.6
Others	0	0.00	0.0
Total		0.96	1.5
Out of Centre Shops			
Sainsburys	10	0.33	0.6
Tesco	15	0.50	1.5
Morrisons	20	0.66	1.5
Aldi	0	0.00	0.0
Farmfoods	6	0.20	6.7
Lidl, Weaver Row	10	0.33	3.8
Local Shops	0	0.00	0.0
B+M	0	0.00	0.0
Other (locations outwith catchment area)	10	0.33	
Diversion (%)	100	3.32	
Total Turnover (£m)		3.32	

Appendix 3


Retail Assessment Plan




Proposed Aldi Extension – Springbank Road, Stirling

Appendix 3 - Retail Assessment Plan









Key

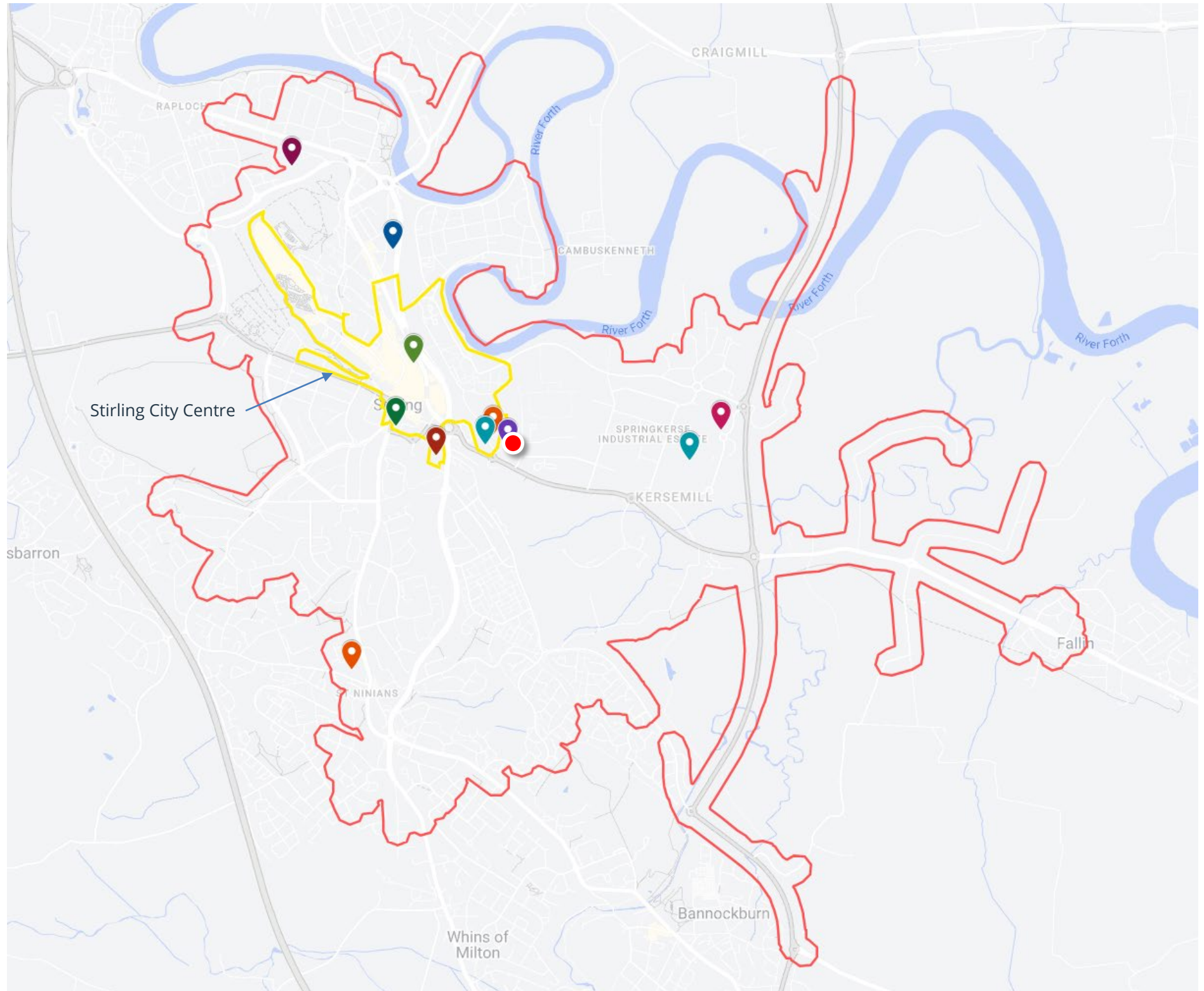
 **Aldi Foodstore – Springbank Road, Stirling**

 **Primary Catchment Area - (5 minute off-peak drivetime)**

 **Allocated Centre Boundary**

Convenience Retailers

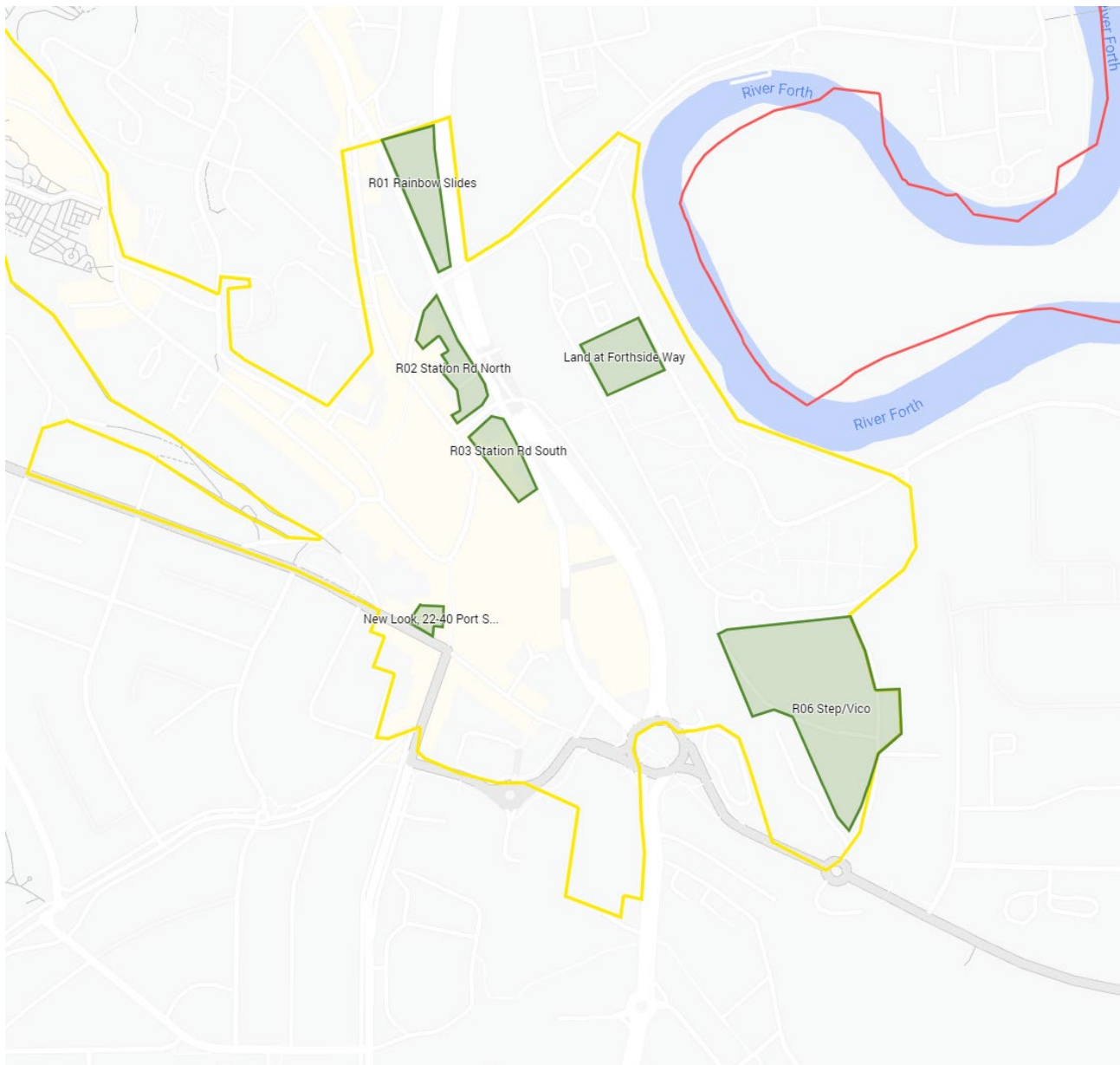
-  B&M
-  Lidl
-  Farmfoods
-  Iceland
-  Morrisons
-  Sainsburys
-  Sainsbury's Local
-  Tesco
-  Waitrose

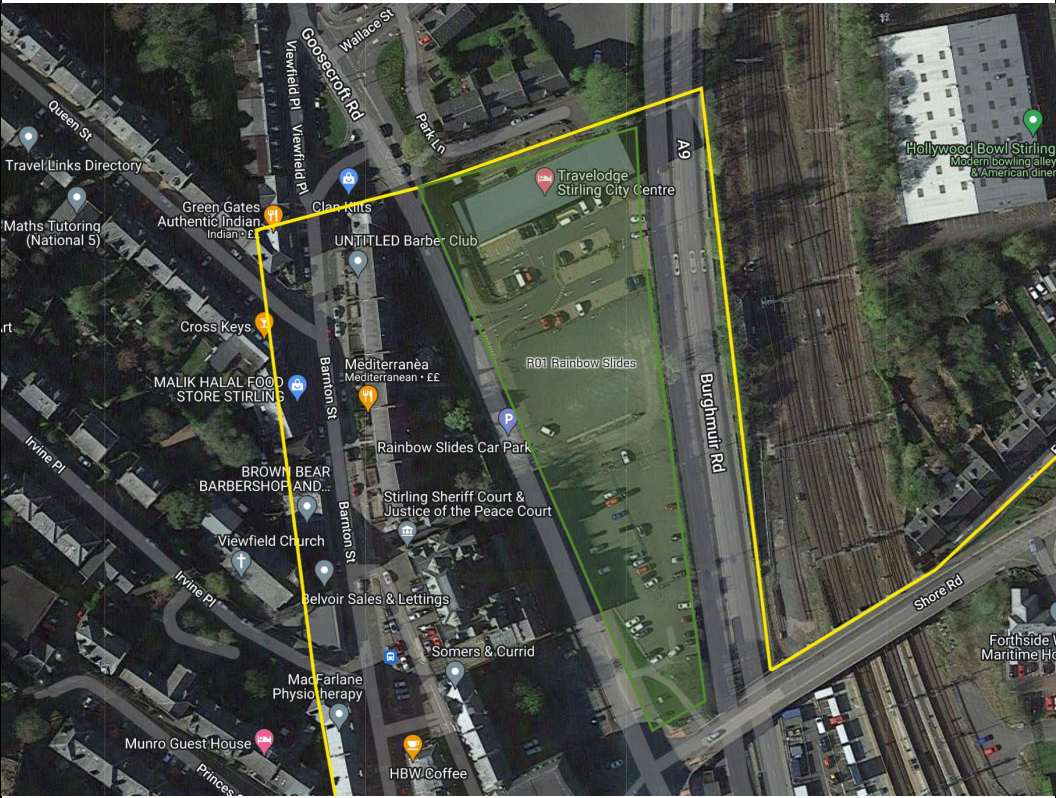


Appendix 4

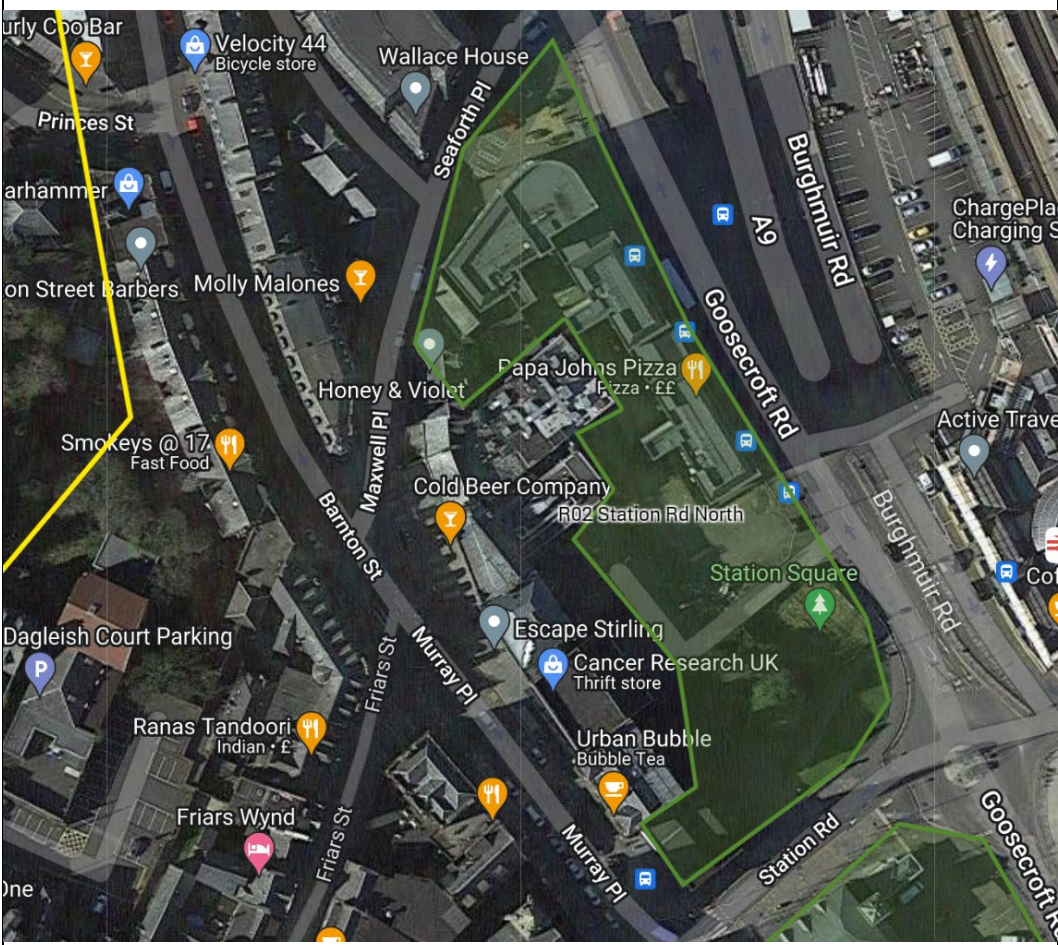
Sequential Assessment

Aldi Stirling Sequential Sites Assessment



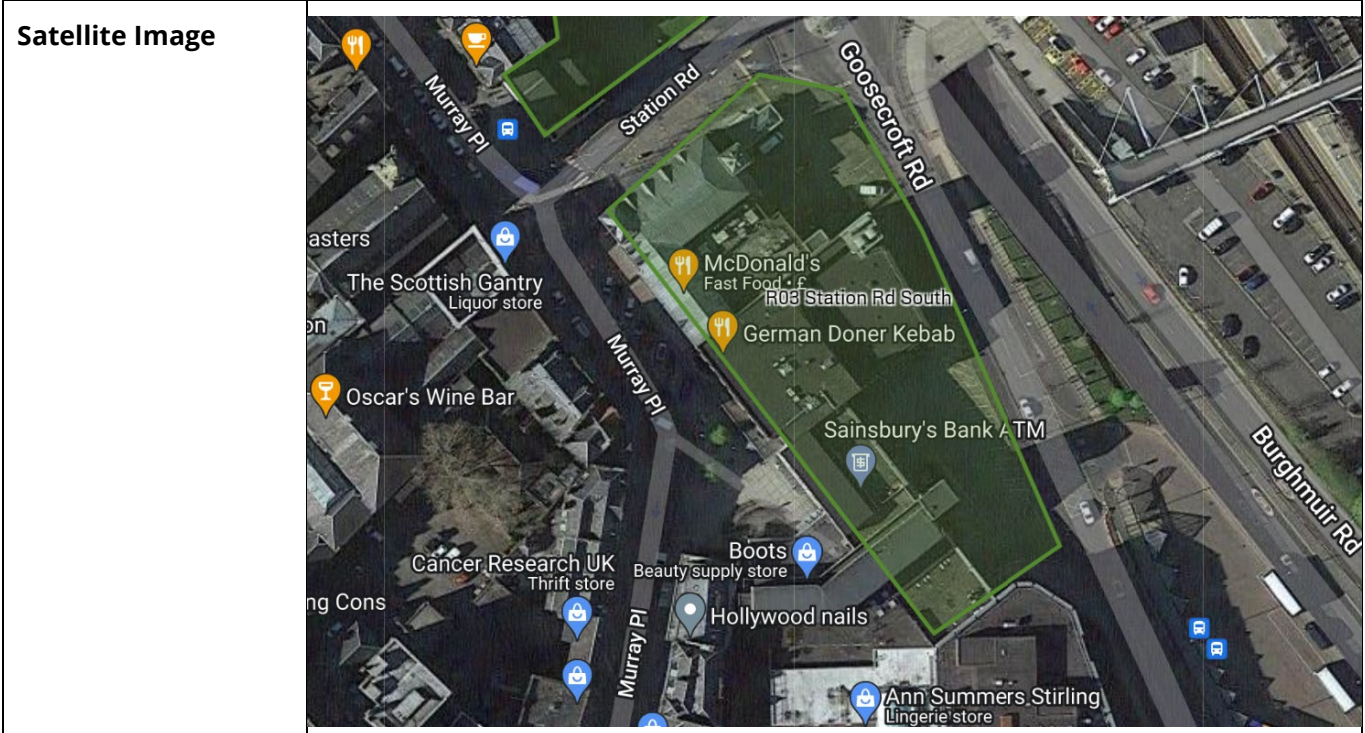
Site 1 – R01 Rainbow Slides	
Satellite Image	
Site Size	The full site extends to 0.88 ha, however only 0.52 ha is undeveloped, comprising a car park.
Existing Uses	The northern part of the site is occupied by a Travelodge and its associated car park, with a separate car park located to the south.
Planning Permissions / Current Development Proposals	<p>Planning permission has previously been granted under reference 12/00712/FUL for full site redevelopment including a hotel retail and student housing. The proposals include retail units to the north of 439 sq.m (location of now constructed hotel) with a hotel and student housing located in a north/south orientation facing onto Goosecroft Road to the west. Further retail units are located below, with units of 559 sq.m and 479 sq.m.</p> <p>The northern part of the site has more recently received planning permission for a hotel under reference 156/00542/FUL. Development of this has been completed and supersedes a large proportion of the plans approved under 12/00712/FUL.</p> <p>On this basis, we consider that 12/00712/FUL cannot be delivered on the site in its current form.</p>
Local Development Plan Position	Allocated in the LDP as a Core Area: Urban Consolidation site with ref R01 Rainbow Slides within Stirling City Centre. The LDP indicates the site is allocated for retail use as 'personal goods' however no floorspace is identified.

<p>Suitability</p>	<p>The remaining undeveloped site comprises a total area of 0.52 hectares which is insufficient to accommodate the proposals even if a significant degree of flexibility was applied.</p> <p>In addition, the site's shape does not allow for an appropriate site arrangement to be achieved as required for these proposals.</p> <p>This site is therefore '<i>unsuitable</i>'.</p>
<p>Availability</p>	<p>The undeveloped site is not being marketed for sale and is currently used as an active car parking facility; therefore, it is considered unlikely to be '<i>available</i>'.</p>
<p>Conclusions</p>	<p>It is unclear if the site is available, given its current use as an active car park. The development of a new retail store in this location would be unsuitable due to an insufficient size and irregular form.</p> <p>In conclusion, the site is not '<i>suitable</i>' and may not be '<i>available</i>'.</p>

Site 2 – R02 Station Road North	
Satellite Image	
Site Size	The site extends to 0.623 ha.
Existing Uses	The site is currently in use by a variety of commercial operators for a variety of uses at ground floor level, with residential properties above.
Planning Permissions / Current Development Proposals	Planning permission in principle and an AMSC application are approved on the site with references 09/00525/PPP and 13/00788/MSC for a mixed use development with ground floor commercial uses and residential properties above. This development is now largely complete and occupies the majority of the site.
Local Development Plan Position	Allocated in the LDP as a Core Area: Urban Consolidation site with ref R02 Station Road North within Stirling City Centre. The LDP indicates the site is allocated for retail use as 'personal goods' however no floorspace is identified.
Suitability	<p>At a full site area of 0.6 hectares the site is insufficient to accommodate the proposals even if a significant degree of flexibility was applied.</p> <p>In addition, the site's shape does not allow for an appropriate site arrangement to be achieved as required for these proposals.</p> <p>This site is therefore '<i>unsuitable</i>'.</p>
Availability	The majority of the site has been fully redeveloped with a multitude of operators

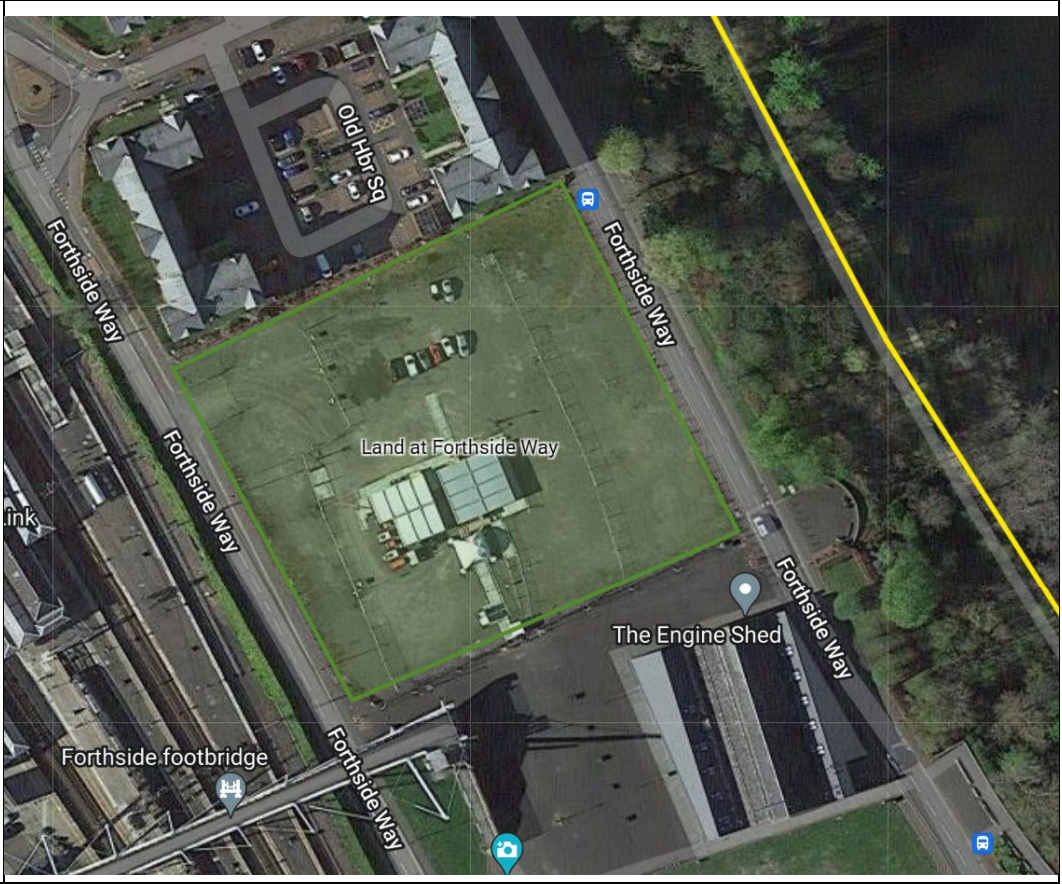
	and residential properties. Only a small area of the site remains undeveloped. For these reasons we do consider that the site is ' <i>unavailable</i> '.
Conclusions	<p>The sites size and form is not suitable for the proposed development and it is now fully occupied by a variety of uses making the site unavailable.</p> <p>For these reasons the site can be discounted as a sequential opportunity as '<i>unsuitable</i>' and '<i>unavailable</i>'.</p>

Site 3 – R03 Station Road South

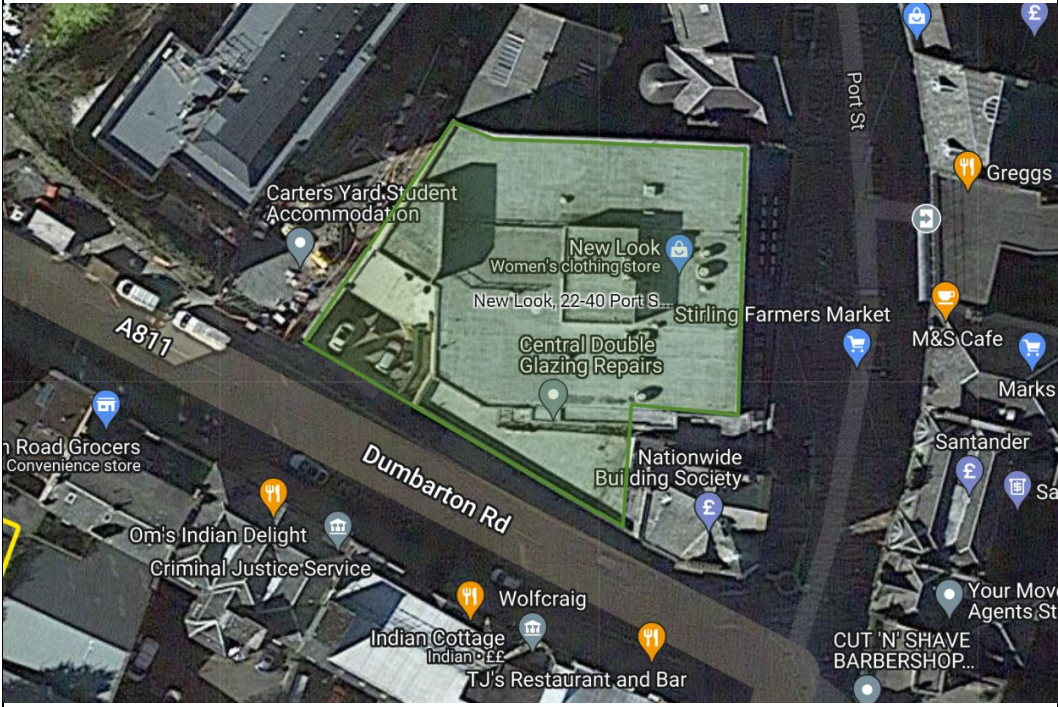


Satellite Image	
Site Size	The site extends to 0.52 ha.
Existing Uses	The site is currently in use as by a variety of commercial operators
Planning Permissions / Current Development Proposals	No relevant planning history of development proposals identified on the planning portal.
Local Development Plan Position	Allocated in the LDP as a Core Area: Urban Consolidation site with ref R03 Station Road South within Stirling City Centre. The LDP indicates the site is allocated for retail use as 'personal goods' however no floorspace is identified.
Suitability	At a full site area of 0.5 hectares the site is insufficient to accommodate the proposals even if a significant degree of flexibility was applied. In addition, the site's shape does not allow for an appropriate site arrangement to be achieved as required for these proposals. This site is therefore <i>'unsuitable'</i> .
Availability	The majority of the site is occupied by a variety of owners and therefore raises questions around availability.
Conclusions	It is noted that the development proposals would have to reduce in size significantly to be accommodated on this site, and as such, this would defeat the purpose of these proposals and the site is therefore unsuitable. It is also unclear if the site is available, given its current uses. In conclusion, the site is not <i>'suitable'</i> and is unlikely to be <i>'available'</i> .

Site 4 – Land at Forthside Way

<p>Satellite Image</p>	
<p>Site Size</p>	<p>The unit extends to 0.697 hectares</p>
<p>Existing Uses</p>	<p>The site is currently vacant, although has most recently been used as a temporary site compound for the adjacent residential properties to the north.</p>
<p>Planning Permissions / Current Development Proposals</p>	<p>No relevant planning history of development proposals identified on the planning portal.</p>
<p>Local Development Plan Position</p>	<p>Allocated in the city centre of Stirling, however site is not allocated for any particular use and is therefore subject to general policies of the development plan.</p>
<p>Suitability</p>	<p>At a full site area of 0.6 hectares the site is insufficient to accommodate the proposals even if a significant degree of flexibility was applied.</p> <p>In addition, limited street prominence and accessibility is afforded to this site, which could impact on the viability of a unit being located here. In addition, relating a full retail store to this location would not be sustainable, conflicting with NPF4. While within the town centre, it is not as well connected to that of the application site.</p> <p>This site is therefore <i>'unsuitable'</i>.</p>
<p>Availability</p>	<p>The site is not being marketed, however might be available.</p>

Conclusions	<p>The site may be available, however its size would be too small for the proposed development. The site also offers limited accessibility and prominence required for the proposed development.</p> <p>In conclusion, the site is not <i>'suitable'</i>.</p>
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Site 5 – 22-40 Port Street (New Look)	
Satellite Image	
Site Size	The existing building extends to 5,657 sq.m spread across 6 floors. The ground floor comprises an area of 1,478 sq.m with other floors varying between 105 sq.m (fifth floor) and 1,495 sq.m (second floor)
Existing Uses	The building is currently occupied by New Look.
Planning Permissions / Current Development Proposals	As identified on CoStar, the site has been marketed for 44 months. New Look currently operates from the unit, and it is unclear as to the terms of their occupation.
Local Development Plan Position	Allocated in the city centre of Stirling, however the site is not allocated for any particular use and is therefore subject to general policies of the development plan.
Suitability	<p>The building provides floorspace well in excess of that required by the proposals, however this is arranged over more than 1 floor. No single floor within the building would provide sufficient space for the required development. As discussed within the main body of the report, LAD discounters require a standard model and floorspace to deliver an appropriate store. Locating within buildings such as this, or within a shopping centre, significantly impacts the viability of the store.</p> <p>In addition to this, there is no availability of customer car parking on the site.</p> <p>For these reasons, the site can be discounted as <i>'unsuitable'</i>.</p>
Availability	The site is actively marketed to let and therefore appears to be available.
Conclusions	<p>The form of the building is not suitable for the development proposed as it would not allow the standard footprint or parking required by these proposals.</p> <p>In conclusion, the site is not <i>'suitable'</i> and can be discounted on this basis.</p>

Site 6 – Former Dunnes Store, Kingdom Shopping Centre

<p>Satellite Image</p>	
<p>Site Size</p>	<p>The overall site extends to c. 3.56 ha. The available area of land comprising the industrial units within the northern parcel of the site extends to an area of c2.1 hectares.</p>
<p>Existing Uses</p>	<p>The site is currently split into two main parcels. To the north lies a large industrial warehouse, which appears to have been split into smaller units. It is occupied by a variety of occupiers and includes a car park to the north of the site. To the south, lies a Lidl store and its associated car park.</p>
<p>Planning Permissions / Current Development Proposals</p>	<p>Planning permission in principle was originally granted in 2007 (ref 07/00824/OUT) and extended in 2012 (12/00010/PPP) for a large format convenience store in the northern portion of the site. This was for a convenience retail unit of no more than 3,105 sq.m of which at least 75% was required to sell “essential goods” including convenience goods, cleaning supplies, books and newspapers etc. These elements were controlled by condition.</p> <p>No further application bringing forward the detail of the development was brought forward, and it is considered that the planning permission expired in 2015.</p> <p>To the southern part of the site, planning permission in principle and an AMSC has been approved for a Lidl supermarket, which now occupies the site.</p>

<p>Local Development Plan Position</p>	<p>Allocated in the LDP as a Core Area: Urban Consolidation site with ref R06 STEP/Vico within Stirling City Centre. The LDP indicates the site is allocated for a convenience superstore of up to 1,424 sq.m net. We believe this correspondence with the now developed Lidl Store forming the southern part of the site.</p>
<p>Suitability</p>	<p>The remaining part of the site (c. 2.1 hectares) is far too large for the proposed development to occupy on its own and would therefore be an inefficient use of the site. It would also require significant demolition of large proportions of the existing building which would impact the viability of the proposals when compared to extending the current store subject of this application. These matters would impact the viability of such a scheme.</p> <p>Despite being within the allocated city centre of Stirling, the site is less accessible than that subject of these proposals. This is because this site is separated from the majority of the retail within the town centre by the railway line, which runs to the west of the site and would therefore not provide significant opportunities for linked trips. It is also less well connected than the site subject of this application given its location.</p> <p>Finally, the location does not offer sufficient prominence that the proposals require. This site is therefore <i>'unsuitable'</i>.</p>
<p>Availability</p>	<p>It is unclear as to whether the site is available, however it is considered likely that agreement from a large number of existing occupiers would be required before any development could take place. Whilst this does not mean the site is unavailable, a complex exercise would be required to secure a parcel of land of sufficient scale.</p>
<p>Conclusions</p>	<p>It has been demonstrated that this site can be discounted on suitability grounds. It has been noted that the site size is far larger than required size and does not feature the required prominence required by the proposals.</p> <p>Furthermore, the location the proposals does not provide any betterment on connectivity to the wider town centre than the application site.</p> <p>In regards availability, it is likely that a significant exercise would need to be undertaken to establish this matter which is likely to impact the viability of the proposed development.</p> <p>In conclusion, the site is not <i>'suitable'</i>.</p>

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