



Aldi Alloa – Proposed Store Extension

Aldi Store, Whins Road, Alloa, FK10 3SE

February 2024

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Appendix 1 – Location Plan

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Status: Final

Date: February 2024

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 proposals to bring forward a detailed planning application regarding the extension to an existing Class 1A retail foodstore in Alloa town centre. It is noted that this application follows planning permission 21/00200/FULL which was approved in August 2021. Further details of the planning history and requirement for a revised application are set out further in Section 3 of this statement.

1.2 A full description of the proposed development is as follows:

“Erection of extension to existing Class 1A retail store including alterations to car park, installation of proposed air source heat pumps, revised store plant layout and 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 front of their existing store in Alloa. These proposals represent 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 Clackmannanshire.

1.4 This planning statement will form part of the planning application, comprising:

- Phase 1 and Phase 2 Geo-Environmental Assessment, prepared by 3E; and
- Associated application drawings, prepared by Projekt Architects.

1.5 The remainder of this Statement has been set out within the following sections:

- Section 2: Aldi Stores Ltd
- Section 3: Site Description & Surroundings
- Section 4: The Proposals
- Section 5: The Development Plan and other Material Considerations
- Section 6: Planning Policy Assessment
- Section 7: 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 over 1,000 stores across England, Scotland and Wales. Within Scotland, there are now 105 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 awarded Which? Cheapest Supermarket (2022) in the last awards, and elsewhere voted Retailer of the Year 2023-24 at the Quality Food Awards, Favourite Wine Retailer and Favourite Premium Supermarket Range at the Good Housekeeping Food Awards 2023. Most recently, for recognition of investment in people, Aldi was crowned Employer of the Year at The Grocer Gold Awards 2023.

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;
 - 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. The following table sets out a summary of the sustainability features incorporated into each new Aldi foodstore as standard:

Table 1: Aldi Store Sustainability Features (Source: Aldi & 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.
		Four bays for electric vehicles will be served by two twin-headed Faster Charger units at all new stores. An additional 20% of bays will have underground ducting installed for future provision.
Water Conservation and Management	Water Use within the Retail Unit	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.

		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.

Heat Recovery System (re-usable energy)

- 2.15 Perhaps the most significant sustainability feature which is provided as standard on all new 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.
- 2.16 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.
- 2.17 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

- 2.18 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

- 2.19 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.
- 2.20 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.

- 2.21 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

- 2.22 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.
- 2.23 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

- 2.24 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

- 2.25 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.
- 2.26 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.
- 2.27 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.
- 2.28 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.
- 2.29 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 1.49 hectares. A site location plan is included at **Appendix 1** of this report, and an extract shown below.

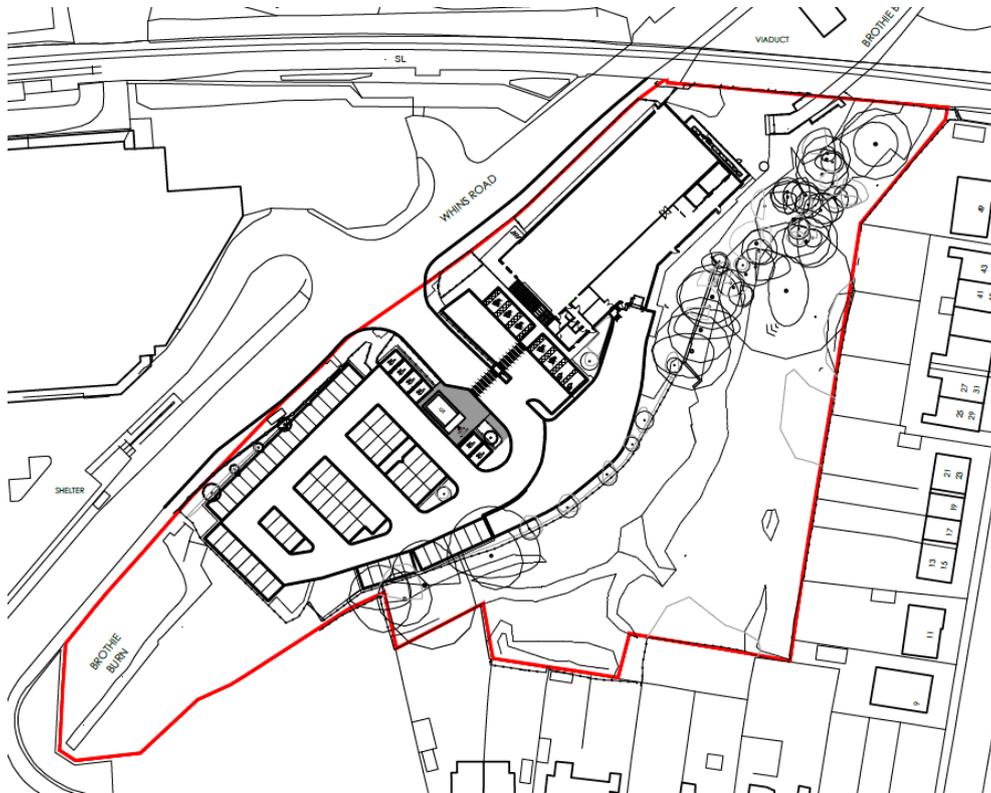


Figure 1: Extract from Site Location Plan

- 3.2 The site lies at the north-east of Alloa town centre within its designated boundary, and comprises the Aldi store, its car park and the existing servicing area. Vehicular and pedestrian access to the store is taken from Whins Road (A908) to the west of the site, served by a signalised junction. An ASDA supermarket is located beyond the A908 to the immediate west of the Aldi store. A railway line runs to the north of the store, along the site's northern boundary. To the south and east is a wooded area which provides separation from the residential properties located further east at Park Place.
- 3.3 In respect of the wider area, there is a mix of uses present, some of which have already been mentioned above. Beyond the ASDA supermarket in the west lies Alloa Railway Station which provides direct links with Glasgow. Further to the south, Forth Valley College Alloa Campus is situated, with additional residential properties to the north and east of the store.
- 3.4 According to the SEPA flood map, the site is located within an area of 'low likelihood' of river flooding from Brothie Burn which runs in a north/south direction under the site itself. Additionally, in areas of the site, there is a 'medium to high likelihood' of surface water flooding indicated.

Planning History

- 3.5 Provided below is a brief summary of the relevant planning history for the existing Aldi store in Alloa, as available on the Clackmannanshire Council planning portal.
- 3.6 Outline planning application 05/00077/OUT was approved by Clackmannanshire Council on 27 October 2005 for: "Erection of Supermarket and Office Building". This planning permission was secured

- by Aldi Stores Ltd. This planning permission was never built out and as such, does not relate to the store today.
- 3.7 Following this, detailed planning application 06/00193/FULL was approved by Clackmannanshire Council on 26 October 2006 for: *“Erection of Supermarket Building with Associated Access Road, Car Park and Landscaping”*. This planning permission facilitated the development of the existing 1,373 sqm (GEFA) store and the development of the associated car park. This planning permission was delivered, with the store opening thereafter.
- 3.8 More recently, a number of minor applications have been submitted for the erection of signage and the installation of a reverse vending machine as part of the Deposit Return Scheme. Other than these minor changes, the store remains unchanged from the original permission and forms the store as currently trading.
- 3.9 In 2021, Aldi sought to extend their existing Alloa store under detailed planning application 21/00200/FULL for: *“Extension To Existing Supermarket, Including Entrance/ Exit Lobby and Loading Dock, Installation of Ventilation and Refrigeration Plant Within Enclosure To Rear, Alterations to Car Park and Access Road Including the Car Park Layout and Number of Spaces and 4 Electric Vehicle Charging Points, Relocation of Trolley and Cycle Parking Facilities and Installation Of Access Path and Bin Store To South of Extension”*. This was approved by Clackmannanshire Council on 19 October 2021 and related to a 456 sqm (GEFA) extension to the south-east elevation of the existing foodstore.
- 3.10 The above planning permission was never built out, and as such, the store remains unchanged from the original permission granted in October 2006. This is because the approved design of the extension as approved does not meet with the operational needs of Aldi. It would also result in the significant loss of habitat, biodiversity and visual amenity as a result of the loss of circa 28 no. trees. The delivery of this layout is also now prohibitively costly to deliver by Aldi.
- 3.11 As such, a revised planning application is required to ensure a more appropriate design can be delivered on the site, which will also provide a more appropriate customer offer. It should also be noted that the 2021 planning permission has been implemented, following agreement with Clackmannanshire Council. It is the intention that only this revised proposal will be delivered and therefore the 2021 permission will be superseded.

4. The Proposed Development

4.1 Aldi is continually reviewing its operation across its Scottish portfolio and has identified the need to extend the Alloa store. Aldi is already well established at Whins Road, Alloa and intends to make further investment at this location to improve retail offering, improve operational efficiency and futureproof its operation in this part of Clackmannanshire. The proposals for a modest extension to the existing store represent Aldi's continued commitment to investment in this area.

4.2 Aldi are proposing an extension to their current store to the front of the existing building line. The application comprises the following:

- An extension to the front and side of the store, providing an additional 408 sqm gross floorspace;
- An extension to the sales area of the store measuring 251 sqm net;
- A new customer entrance and exit lobby at the south west of the store;
- New shop front glazing facing south, towards the car park;
- Relocation of trolley park to the western elevation of the store, adjacent to Whins Road;
- Internal reconfiguration for back of house warehousing to be situated at the rear of the store, with improved store colleague facilities to be housed in the newly formed extension on the south-east elevation;
- Reconfiguration of car parking to relocate the accessible and parent & child spaces, resulting in a total increase of 3 no. parking spaces, and, retrofitting 4 no. parking spaces with electric vehicle charging points (EVCPs);
- Introduction of 6 no. air source heat pumps;
- Relocation of cycle parking provision to provide an addition 2 no. cycle spaces; and
- Upgrading of existing store plant with new, more sustainable equipment.

4.3 The following table provides a breakdown of the proposals in comparison to the existing store:

	Existing Store	Proposed Store	Difference
Gross External Floor Area (sqm)	1,373	1,781	+408
Sales Floorspace (sqm)	900	1,151	+251
Car Parking Provision	86	89	+3
Cycle Parking Provision	8	10	+2

4.4 The proposed site layout is reproduced in the extract below, with the proposed floor plan detailed below that:

- 4.5 The proposals include a range of 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 extension will be comprised of Wetherby WBS through-coloured render system incorporating WBS base coat UF and silicone K. This will match the existing elevations of the store. In addition, a new canopy will be installed and will be comprised of polyester powder coated aluminium in an Anthracite colour. Further details of the proposed materials are provided on the submitted elevational plans.
- 4.6 To provide context of the materials used and how these will complement the existing store, the proposed building elevations is reproduced in the extract below:

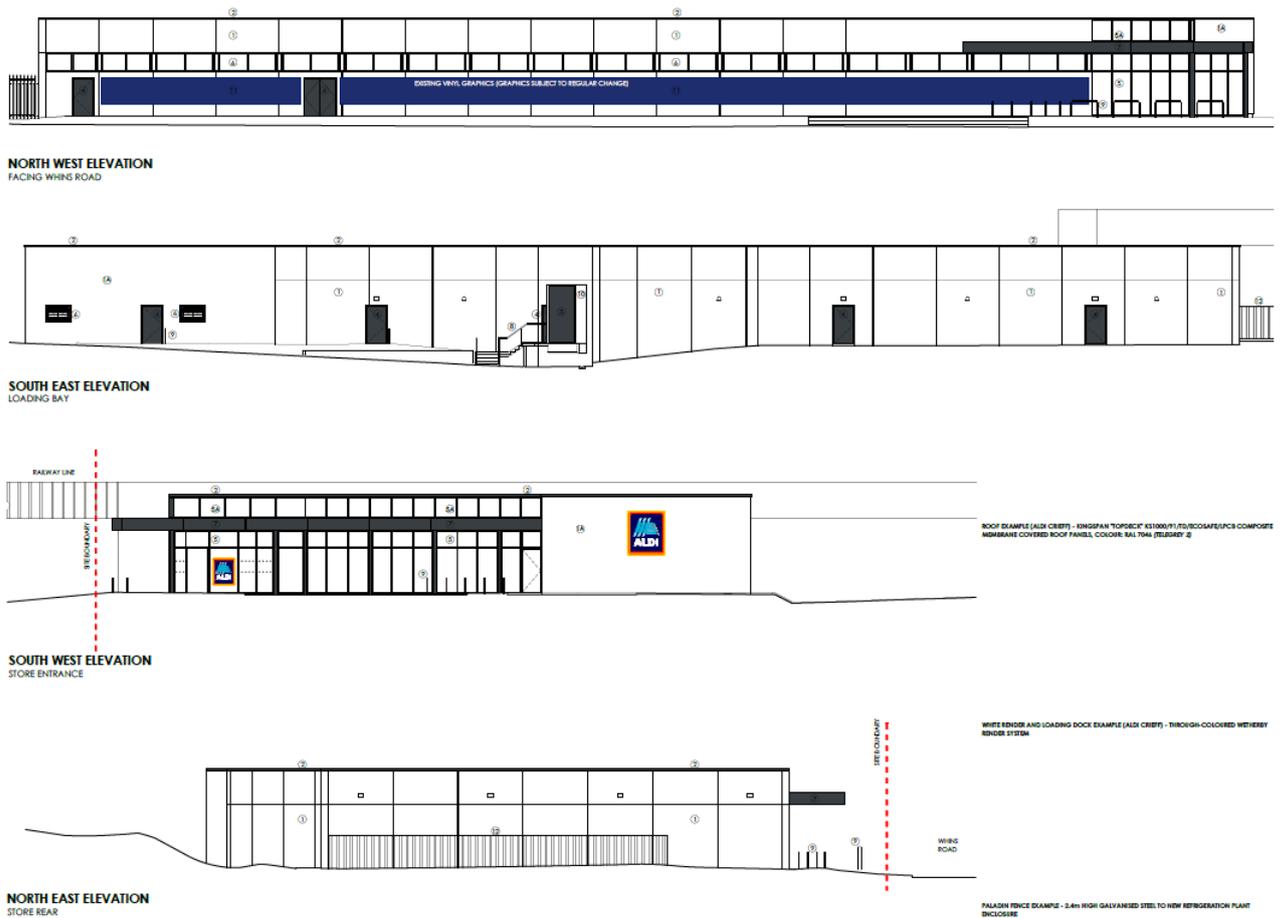


Figure 4: Extract from Proposed Building Elevations

5. The Development Plan and Other Material Considerations

- 5.1 The Town and Country Planning (Scotland) Act 1997 (as amended) requires that planning applications are 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 and material considerations which are of relevance to this application are 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.

The Development Plan

- 5.4 The statutory development plan for the site comprises the National Planning Framework 4 ("NPF4") and the Clackmannanshire Local Development Plan 2015 ("LDP").
- 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.

National Planning Framework 4

- 5.6 The NPF4 was formally adopted by the Scottish Government on 13 February 2023. It therefore forms part of the Development Plan for which all planning applications should be assessed against.
- 5.7 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).
- 5.8 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."

- 5.9 From NPF4, the following policies have been identified as relevant to these proposals.
- 5.10 **Policy 1: Sustainable Places** states:

"When considering all development proposals significant weight will be given to the global climate and nature crises to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change."

- 5.11 **Policy 2: Climate Mitigation and Adaption** seeks to encourage, promote and facilitate development that minimises emissions and adapts to the current and future impacts of climate change.
- 5.12 **Policy 9: Brownfield, Vacant and Derelict Land and Empty Buildings** notes that the reuse of brownfield, vacant and derelict land is encouraged. This policy goes on to state that:
- “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.*
- 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.”*
- 5.13 **Policy 11: Energy** provides support for development proposals for all forms of renewable, low-carbon and zero emission technologies, including small scale renewable energy generation technology, such as air source heat pumps.
- 5.14 **Policy 13: Sustainable Transport** makes reference to various factors which should be incorporated into new developments to encourage sustainable transport. These include, but are not limited to:
- *“Provide direct, easy, segregated and safe links to local facilities via walking, wheeling and cycling networks before occupation;*
 - *Will be accessible by public transport, ideally supporting the use of existing services;*
 - *Integrate transport modes; and*
 - *Provide low or zero-emission vehicle and cycle charging points in safe and convenient locations, in alignment with building standards.”*
- 5.15 **Policy 14: Design, Quality and Place** should also be considered as part of these proposals. This policy sets out a range of criteria for which development proposals will be supported where they are consistent with the six qualities of successful places. These qualities are:
- **“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.”
- 5.16 **Policy 22: Flood Risk and Water Management** must also be considered given the sites allocation within the SEPA flood map. Policy 22 notes:
- 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.*

b) *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."*

5.17 **Policy 27: City, Town, Local and Commercial Centres** is of relevance given the site of these proposals being situated within Alloa Town Centre. Policy 27 highlights:

"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.

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 will be supported in existing city, town and local centres."

5.18 Finally, **Policy 28: Retail** notes:

"Development proposals for retail (including expansions and changes of use) will be consistent with the town centre first principle. This means that new retail proposal will be supported in existing city, town and local centres."

Clackmannanshire Local Development Plan 2015 ("LDP")

5.19 The Clackmannanshire Local Development Plan was adopted in August 2015 and sets out the objectives and policy framework for new development over the lifetime of the plan. The LDP has a number of 'strategic objectives' alongside specific policies. Below, the relevant strategic objectives and policies are detailed.

5.20 Taking each in turn, we have set out below the various strategic objectives which are relevant to these proposals, followed by the relevant policies:

5.21 **Strategic Objective 1** states as follows:

"To meet the future needs of Clackmannanshire's communities by providing a focussed framework for change and growth through:

- *Focussing new development in areas where it can fully support our economic, environmental and social objectives;*
- *Continuing the planned regeneration of our town centres and existing neighbourhoods, where opportunity arises."*

5.22 **Strategic Objective 2** states as follows:

"To continue the economic regeneration of Clackmannanshire and increase its economic potential for the benefit of its residents, by supporting business growth and improved employment opportunities through:

- *providing a range of appropriate, well designed places, which can attract business investment, employment and employees to locate in Clackmannanshire, retain existing business support new enterprise locally, and support economic diversification;*

- *through the promotion of a growth strategy, increase the demand for services in the area and generate employment opportunities."*

5.23 For clarity, policies which are considered relevant to these proposals have been grouped by topic subheading below.

Retail Policies

5.24 Within the LDP, the site is designated within the Alloa Town Centre. This is shown by the below extract from the LDP proposals map, with the town centre boundary denoted by the purple line.

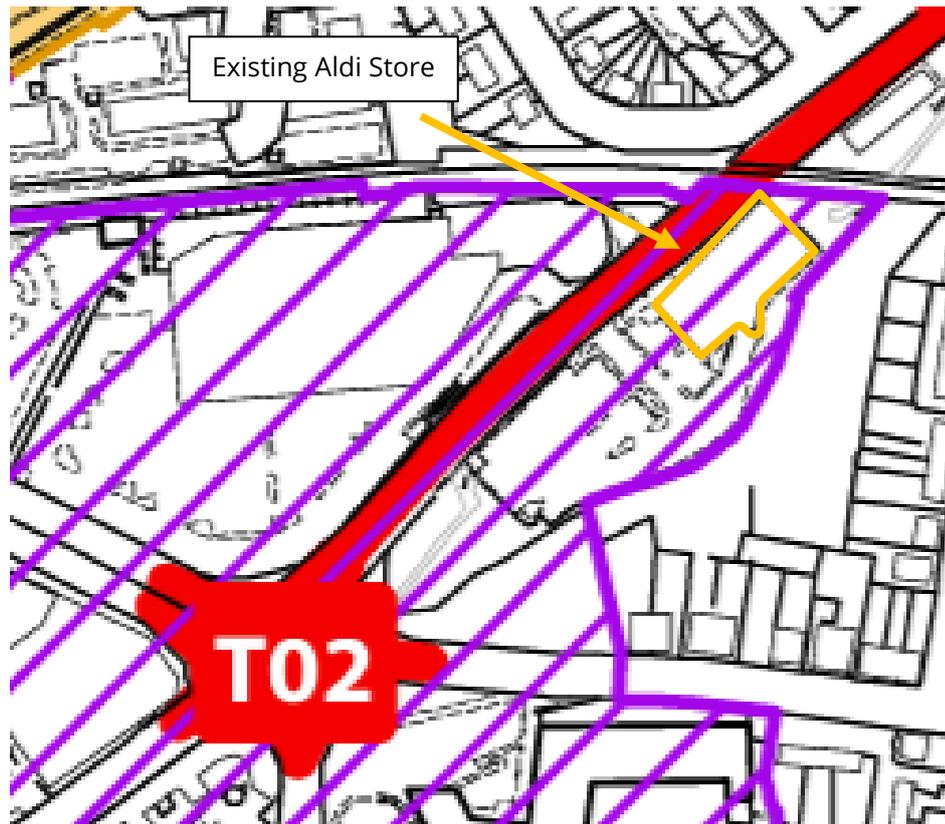


Figure 5: Extract from Clackmannanshire Local Development Plan (2015)

5.25 Following on from this, **Policy EP14: Retail Network Centre and Hierarchy** is relevant to consider. This policy states:

"The purpose of this policy is to protect and enhance the role and function of the network and hierarchy of retail centres in Clackmannanshire. The Council will protect and enhance the role and function of the network and hierarchy of centres as set out in Table 5 Hierarchy of Retail Centres. Proposals for retail or commercial leisure (including the expansion or change of use of existing developments of a scale sufficient to change their role or function) or major community uses that would not support the role and function of the hierarchy of centres and/or are not of a scale or character commensurate with maintaining the hierarchy of the centres will not normally be acceptable."

5.26 The policy wording, as shown above, identifies that town centre sites are the most preferable location in terms of retail hierarchy.

5.27 **Policy EP15: Promoting Town Centre Regeneration** should also be considered as part of these proposals. Policy EP15 notes that developments which contribute to town centre regeneration, in accordance with the LDP Strategy will be support. The policy also states:

“The Council will support proposals which would contribute to the regeneration of town centres within Clackmannanshire by:

- *supporting a variety of commercial, community, leisure, cultural and business uses within town centres to help maximise and diversify the range of uses, where this will enhance the vitality or viability of the town centre; and*
- *ensuring that, by virtue of appropriate design and layout, all new developments contribute to the creation of active and attractive pedestrian frontages; achieve high standards of design and finish; provide safe and convenient access for pedestrians and cyclists; and, where appropriate, safeguard and enhance the historic built environment.”*

5.28 **Policy EP16: New Retail and Commercial Leisure Development** is also relevant. This states:

“The Council will support proposals for retail and commercial leisure developments within a network centre subject to the following criteria:

- *The proposal is of a scale and character which supports the role and function of that centre as defined in the network of centres and hierarchy; and*
- *Proposals for retail development in excess of 250 sqm GFA and below 1,000 sqm GFA will normally be directed to Alloa Town Centre or one of the Other Town Centres.*

The design and layout would:

- a) enhance the character and appearance of the area;*
- b) create an attractive pedestrian frontage;*
- c) integrate visually and functionally with the existing centre;*
- d) not result in a significant adverse impact on residential amenity or neighbouring uses;*
- e) provide adequate servicing and waste management measures and;*
- f) accord with the Council's parking requirements; and*
- g) in the case of town centre development, accord with the requirements of Policy EP15.”*

5.29 Similarly, **Policy EP17: Supermarket and Superstore Development** must also be considered. This policy sets out criteria for supermarket and superstore proposals in accordance with the LDP Strategy. It states:

“The Council will normally only support supermarket and superstore developments where these are restricted to extensions to existing stores which do not exceed 10% of the original gross floor area. The Council will encourage new food retail floorspace in Other Town Centres where this is commensurate with the size of the local community. Proposals will have to satisfy the requirements in Policy EP16.”

5.30 Finally, **Policy EP22: Shop Front Design, Advertising and External Security Measures** should be considered. This policy notes:

“Shop Front Design: Proposed new and altered shopfronts will only be supported where they respect the character and appearance of the building and surrounding area, in terms of design, proportions, materials and external finishes.”

Environmental and Flooding Policies

5.31 **Policy EP6: Green Business** should be considered as part of these proposals. The aim of this policy is to provide support and encouragement to 'green business' by encouraging the advancement of low-carbon, resource efficient practices which have a positive environmental outcome. The policy goes on to note that high standards of sustainability will be a material consideration when determining business and industrial proposals.

5.32 Secondly, **Policy EA11: Environmental Quality** is relevant to consider. This policy states:

"Developments that have the potential to negatively impact the quality of the environment, either individually or in combination with other developments, such as through air, water, soil, noise or light pollution, will only be acceptable where the developer has demonstrated, to the satisfaction of the Council, that all reasonable measures to minimise such impacts have been taken, and any unavoidable impacts will be appropriately mitigated."

5.33 **Policy EA9: Managing Flood Risk** is relevant given the SEPA flood map allocation of the site. This policy highlights that there will be a general presumption against proposals for built development or land raising on a functional flood plain and in areas where there is a significant flooding probability from any source. The policy also notes that development will not be supported where the proposal would increase the probability of flooding elsewhere.

5.34 Lastly, **Policy SC14: Renewable Energy** should be considered in relation to the proposed air source heat pumps. This policy notes that development proposals for all renewable or low carbon energy generation will generally be supported so long as they meet the range of criteria outlined within this policy.

Transport Policies

5.35 It is relevant to consider **Policy SC11: Transport Networks** in relation to these proposals. This policy aims to ensure that the impacts of development on the wider transport network are considered, and that opportunities to enhance the network are identified at an early stage.

5.36 Following this, **Policy SC12: Development Proposals – Access and Transport Requirements** should also be considered. The policy notes:

"Proposals for development will only be supported where they are:

- *Capable of being safely and conveniently accessed by a choice of travel modes including walking, cycling and public transport as well as by motor vehicles;*
- *Located and designed to reduce travel demands; and*
- *Layout patterns will be expected to favour and encourage walking and cycling, and minimise conflict between pedestrians, cyclists and motor vehicles."*

General Development Policies

5.37 **Policy EA2: Habitat Networks and Biodiversity** is relevant to consider. This policy sets out a range of criteria for which development proposals are expected to adhere to. These criterion are:

- *"maximise the potential of their development to contribute positively to biodiversity conservation and enhancement (and seek mitigation for any adverse impacts of development);*
- *protect and enhance existing habitat networks in or adjacent to the development site;*
- *mitigate any negative impacts on habitats, species or network connectivity either resulting from the development or as a result of the cumulative effects of developments locally; and*

- *identify opportunities to strengthen the existing habitat network by creating new habitat links.”*

5.38 Finally, it is considered that **Policy EA7: Hedgerows, Trees and Tree Preservation Orders** is relevant to these proposals. This policy aims to retain trees, woodland and hedgerows that make a positive contribution to local amenity and states:

“Where necessary, the Council will protect endangered trees and woodlands through the designation of Tree Preservation Orders (TPOs). Development will not be supported within TPO areas unless the applicant demonstrates to the satisfaction of the Council that proposals will not adversely affect the longevity, stability or appearance of the trees.

Where development is permitted which will involve the loss of existing woodland, trees or hedgerows the Council will require the development proposals to include appropriate replacement planting in terms of number, size and species.”

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;
- Environment and sustainability;
- Flooding matters; and
- Other relevant policies.

The Principle of Retail

6.3 As identified within the adopted LDP, the site is located within the boundary of the Alloa Town Centre. This demonstrates that the development would be consistent with its status as the principal shopping centre as defined within the hierarchy of retail centres, as supported by Policy EP14 of the LDP, but also Policies 27 and 28 of NPF4. Furthermore, the development seeks to maintain the positive frontage to Whins Road and continues to accommodate pedestrian and cycle trips, thus having a positive impact on the vitality and viability of the town centre as required by Policy EP15.

6.4 It should also be noted that as a result of the sites location within the defined Alloa Town Centre, there is no requirement for a sequential assessment to be undertaken to satisfy Policy 28 from NPF4. This is because NPF4 advocates a town centre first approach. It is clear that the proposals fully comply with planning policy on retail matters and are supported by the town centre approach outlined in these various policies.

6.5 Policy EP16 is supportive of proposals for retail and commercial leisure developments within a network centre subject to certain criteria being met. The proposed development is of a scale and character which supports the role and function of Alloa District Centre and has a proposed floorspace of under 1,000 sqm GFA. Policy EP16 also notes that retail development proposals under this threshold will be directed to Alloa Town Centre. These proposals therefore fully comply with this policy given its size (408 sqm GEFA) and its location. Furthermore, we note that the size of the proposed extension is well below the threshold of 2,500 sqm set out in Policy EP16 where a retail impact assessment may be required.

6.6 Lastly, it is considered that Policy EP17 has been satisfied. While the proposed extension of 408 sqm GEFA represents an increase of 23% of the existing gross floor area, such an extension on the site has already been considered acceptable. This is demonstrated within the Report of Handling for the previous permission (ref. 21/00200/FULL). In that case, the council were supportive of a 33% increase in floorspace with regards Policy EP17. The policy wording states that "*normally*" only proposals up to 10% would be supported, however we consider a flexible approach allowing a departure from this limit would be reasonable in this location given the precedence NPF4 now takes over the LDP, and that NPF4 identifies that town centres are the preferred location for retail development.

6.7 Having provided an assessment of the above policies, it has therefore been established that the proposals fully comply with **NPF4 Policies 27 and 28** and **LDP Policies EP14, EP15, EP16 and EP17**.

The Proposals Design

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

Six Qualities of Successful Place	Assessment
<p>Healthy: Supporting the prioritisation of women's safety and improving physical and mental health.</p>	<p>These proposals seek to improve the discount food offering within Alloa by increasing sales floorspace, in turn, providing existing shoppers access to a better choice of affordable healthy foods which can positively contribute to a range of factors such as physical and mental health. The extension may also encourage additional local residents from using this store, rather than travelling further afield to access a larger Aldi or discount retailer.</p> <p>Passive surveillance offered by the store will ensure that safety of customers can be maintained during operational hours. This is provided by the windows which face the car park from the store itself and the car park lighting provided during the store's operational hours during any hours of darkness.</p>
<p>Pleasant: Supporting attractive natural and built places.</p>	<p>These proposals incorporate the existing Aldi store design features, such as materials, to ensure the proposed extension remains complementary to the surrounding area.</p>
<p>Connected: Supporting well connected networks that make moving around easy and reduce car dependency.</p>	<p>Through these proposals, Aldi are encouraging sustainable transport by including 2 no. additional cycle parking spaces, retrofitting 4 no. car parking spaces with electric vehicle charging points and continuing to connect into the wider public transport network in Alloa.</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 will not significantly alter the existing shop front façade, and, is therefore in keeping with the existing architectural style of the area. This also ties in with the requirements of LDP Policy EP22 which require proposals to match the existing shopfronts.</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 mentioned previously in Section 2, Aldi incorporate a range of features into their store development to improve sustainability and operation. These are outlined further in the 'environmental, sustainability and flooding matters' sub-heading of this section.</p>

Six Qualities of Successful Place

Assessment

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.

These proposals seek to future-proof the Aldi offering in Alloa at the current Whins 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. It is believed that these proposals provide a betterment compared to the permission already granted by way of a range of improvements. These include the addition of new store plant and air source heat pumps, the increase in cycle parking, and not least, the retention of all but one tree, compared to the previous permission which approved the loss of circa 28 no. trees.

- 6.9 LDP Policy EP22 sets out a number of different standards for shop fronts which are relevant to the design of these proposals. This policy notes that proposed new and altered shopfronts should respect the character and appearance of the building and surrounding area, in terms of design, proportions, materials and external finishes.
- 6.10 This has been demonstrated by the range of materials identified in Section 4 of this report and the retention of the positive frontage to Whins Road. It has therefore been established that the proposals fully comply with **NPF4 Policy 14** and **LDP Policy EP22**.

Transport Matters

- 6.11 Policy 13 from the NPF4 sets out a clear set of criteria which should be incorporated into new development to encourage sustainable transport. Many of these features have been incorporated into the proposed development including: the installation of additional cycle parking facilities, the retrofitting of 4 no. car parking spaces with electric vehicle charging points and continuing to connect into the wider public transport network in Alloa.
- 6.12 The requirements of LDP Policy SC11 and Policy SC12 set out various transportation matters which applicants are required to consider in the preparation of their applications. Policy SC11 centres around transport impacts on the wider network. Given this is an existing store, with minimal changes to parking provision proposed, it is not considered that any detrimental impact on the wider transport network would be created by the development.
- 6.13 Policy SC12 states that proposals will not be supported if the site is not accessible by a choice of travel modes, including walking, cycling and public transport as well as motor vehicles. The policy also notes that proposals should be designed in a way to reduce travel demands, while favouring and encouraging more sustainable modes of transport such as walking and cycling.
- 6.14 For the site, there are approximately 6 no. bus services serving Whins Road every hour, with direct connections to Stirling, Dollar, Alloa and Larbert accessed from the bus stops on Whins Road, directly adjacent to the Aldi site. This clearly demonstrates that the proposals comply with the policy.
- 6.15 Finally, it is noted that the Roads and Transportation consultee response for the previous permission (ref. 21/00200/FULL) raised no objections to the proposed development. While this proposal varies

slightly in terms of transport matters, it is considered that there would not be any impact on road safety or the measures to promote active travel.

- 6.16 As demonstrated above, it can be concluded that these proposals fully comply with **NPF4 Policy 13** and **LDP Policies SC11** and **SC12**.

Environment and Sustainability

- 6.17 Policy 1 and Policy 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 EP6 from the LDP supports 'green business' by encouraging the advancement of low-carbon, resource efficient practices which have a positive environmental outcome. Policy EA11 from the LDP notes that appropriate mitigation should be provided to ensure that no development has the potential to negatively impact the quality of the environment.
- 6.18 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. This is set out within Section 2 of this report.
- 6.19 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.
- 6.20 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 an increase of new floorspace by just 23%.
- 6.21 Both Policy 11 of NPF4 and Policy SC14 of the LDP focus on renewable energy processes. Both policies have a general presumption that development proposals which contribute to the reduction in carbon emissions and propose renewable energy sources will be supported. As part of these proposals 6 no. air source heat pumps are set to be installed to replace the existing gas fuelled heating system for the store. This is alongside new store plant to cool chiller cabinets, which are more energy efficient than the current plant. Both of these aspects will reduce the overall carbon footprint of the store operation significantly.
- 6.22 It is also important to note, , that the proposed minor extension is viewed as a more sustainable option to increasing sales floorspace, rather than delivering further retail floorspace. 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
- 6.23 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. The proposed minor extension is viewed as a more sustainable option to increasing sales floorspace, without the

need for a new store. This, coupled with the inclusion of new store plant and air source heat pumps supports **NPF4 Policies 1, 2 and 11** and **LDP Policies EP6, EA11 and SC14**.

Flooding Matters

- 6.24 Turning to flooding, both Policy 22 from NPF4 and Policy EA9 from the LDP note that new development will generally not be supported in a flood risk area. Both policies set out a range of criteria which should be adhered to for development proposals in areas at risk of flooding. As mentioned previously, the site sits in an area of medium to high likelihood of surface water flooding.
- 6.25 Given these proposals relate to a reduction in the overall increase compared to the previous permission granted in 2021, it is not considered necessary to submit a Flood Risk Assessment at this stage. It is noted that the Report of Handling for permission 21/00200/FULL concluded that while the site was in an area identified as being medium to high risk of fluvial flooding, there would not be grounds to withhold permission nor attach conditions relating to flood management infrastructure within the site as a result of the following factors:
- The works comprise an extension to an existing commercial building and would not physically affect the existing watercourses or flood infrastructure.
 - The applicant is aware of the flood risk at the site.
 - Given the design of the extension and site layout, the development is not expected to result in any significant increase in the probability of flooding elsewhere.
- 6.26 As such, it has been demonstrated that both **NPF4 Policy 22** and **LDP Policy EA9** are complied with as part of these proposals and that consideration of the Report of Handling for permission 21/00200/FULL agrees with this position.

Other Relevant Policies

- 6.27 LDP Policy EA2 centres around habitat and biodiversity, while LDP Policy EA7 is concerned with trees and woodland. As mentioned previously in this report, it is considered that the proposed development provides a significant betterment to the previous permission – particularly with regards habitat, biodiversity and trees. It is noted that as part of permission 21/00200/FULL, it was concluded that the development with the loss of circa 28 no. trees, was not considered to be contrary to either of Policies EA2 or EA7.
- 6.28 It is however noted that within the Report of Handling, it was stated that the above conclusion was regrettable, although *“in the absence of any practicable alternative options to extend the building avoiding the trees”*. As such, we believe the proposed development has significantly improved the outlook for the overall site with regards habitats and woodlands through the alternative design which better suits Aldi, Clackmannanshire Council and the residents of Park Place who benefit from screening as a result of these trees. Therefore, it is considered that both **LDP Policies EA2** and **EA7** are fully complied with.

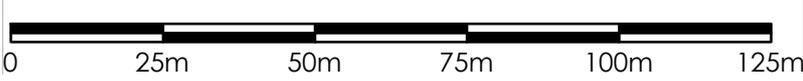
7. Conclusions

- 7.1 Aldi is already well established at Whins Road, Alloa and intends to make further investment at this location to improve retail offering, improve operational efficiency and futureproof its operation in this part of Clackmannanshire. The proposals for a modest extension to the existing store represents Aldi's continued commitment to investment in this area.
- 7.2 It is reiterated that these proposals broadly align with planning permission 21/00200/FULL, granted in October 2021 for a similar extension. Aldi wish to note that they do not intend to build out the 2021 permission, and instead, are bringing forward these proposals which are considered to represent a more appropriate development. As noted in Section 3 of this report, the approved design does not meet with the operational needs of Aldi. It would also result in the significant loss of habitat, biodiversity and visual amenity as a result of the loss of circa 28 no. trees. The delivery of this layout is also now prohibitively costly to deliver by Aldi. As such, a revised planning application is required to ensure a more appropriate design can be delivered on the site, which will also provide a more appropriate customer offer.
- 7.3 Furthermore, it is considered that these proposals provide a betterment compared to those as previously approved in October 2021. In summary, these improvements include:
- Additional cycle parking provision;
 - Provision of new store plant which will be significantly quieter and more efficient;
 - Installation of 6 no. air source heat pumps which will significantly improve the stores sustainability credentials and carbon footprint; and
 - The almost entire omission of the loss of circa 28 no. trees, as approved, to just the loss of one tree, as proposed.
- 7.4 Given the information provided within this planning statement, the following conclusions can be drawn in support of this application:
- The proposal complies with the relevant planning policies within the NPF4 and the statutory development plan which covers the site.
 - The development will improve the design quality and appearance of the existing Aldi store, whilst retaining the positive frontage to Whins Road.
 - The proposals will increase the car parking provision in order to meet higher shopper demand, while encouraging sustainable transport modes through the inclusion of 4 no. EVCPs and 2 no. further cycle parking spaces.
 - The proposed development represents a significant investment by Aldi into the Alloa area and underlines Aldi's commitment to this part of Clackmannanshire.
 - The proposals will bring a number of economic benefits to the local area, including providing both direct and indirect new employment and supporting local trades during the construction period.
 - The development will improve the vitality and viability of the commercial centre with the potential to create new linked trips, without causing any significant adverse impact on the vitality or viability of existing retailers within the adjacent town centre.

- The proposals will improve the overall sustainability credentials of the site and reduce the carbon footprint of the existing store as a direct result of the new store plant and air source heat pumps proposed.

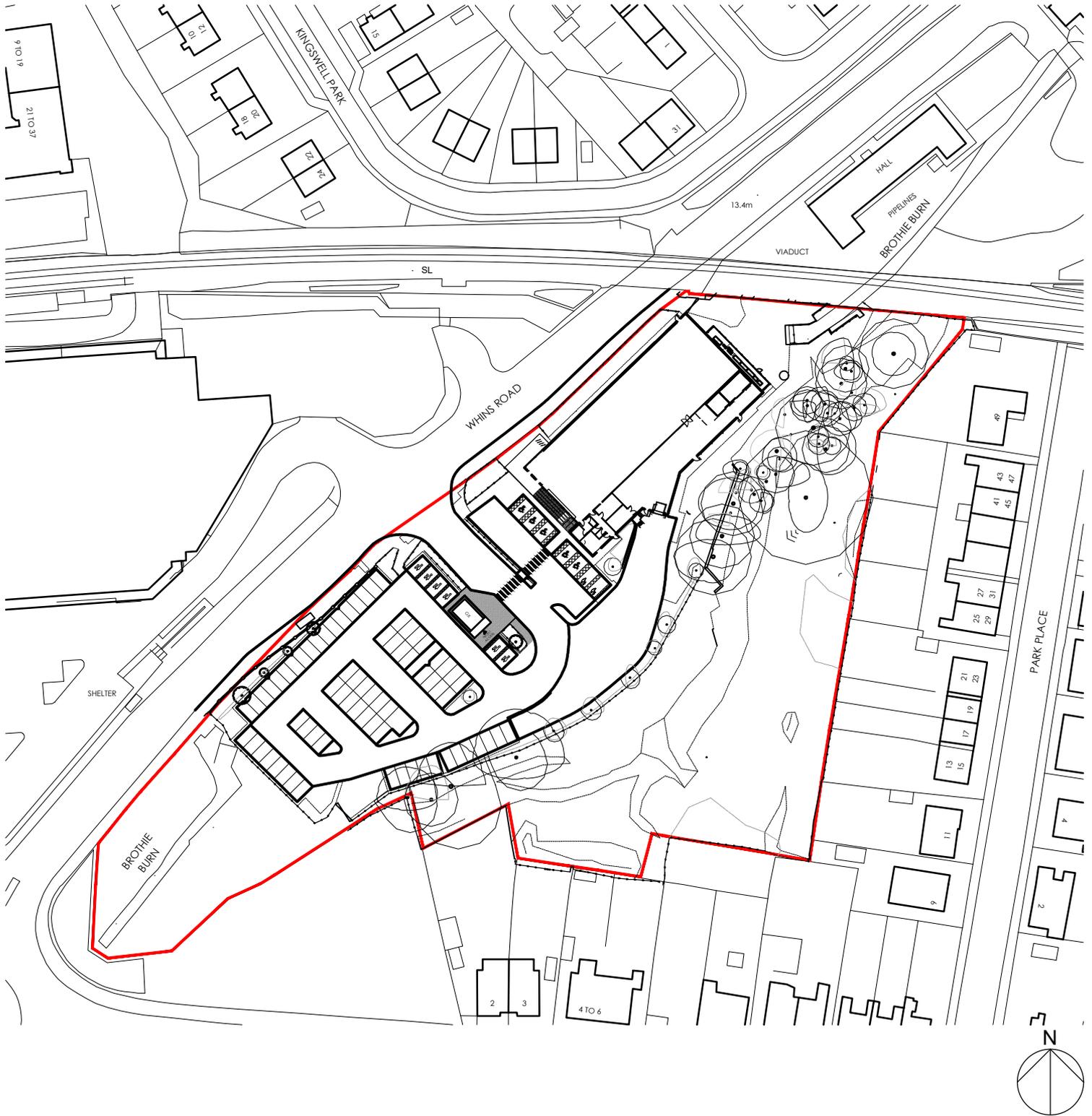
7.5 The proposals have been assessed against the relevant planning policy and have been found to comply with the Development Plan. In view of these conclusions, it is respectfully requested that Clackmannanshire Council approve the application proposals at their earliest convenience.

Appendix 1 – Location Plan



REV	DATE	DESCRIPTION	DRW	CHK
P01	2023-07-28	FIRST ISSUE.	NM	LAV

TOTAL SITE AREA = 14,992m² / 3.70 ACRES



Client
Aldi Stores Ltd.



Drawing Title
SITE LOCATION PLAN

Project Title
Aldi - ALLOA

Project Address
**WHINS ROAD,
ALLOA, FK10 3SE**

Job No.	Originator	Zone	Level	Type	Role
79-E0528 PA		XX	00	DR	A
Classification	Drawing No.	Suitability	Revision		
PM_40_50_21-0001		S4	P01		

Drawn	Checked	Date	Scale	Size
NM	LAV	2023-07-21	1:1250	A4

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