Customer Ref:	01734	**Response Ref:**	ANON-KU2U-GPUB-N	**Supporting Info**	Yes
Name	Steven Robb			**Email**	steven.robb@avisonyoung.com
Response Type	Agent / Consultant				
On behalf of:	Aldi Stores Ltd.				

Choice **1 A**

We want to connect our places, parks and green spaces together as part of a city-wide, regional, and national green network. We want new development to connect to, and deliver this network. Do you agree with this? - Select support / don't support

Short Response Not Answered

Explanation Not Answered

Choice **1 B**

We want to change our policy to require all development (including change of use) to include green and blue infrastructure. Do you agree with this? - Support / Object

Short Response Not Answered

Explanation Not Answered

Customer Ref:	01734	**Response Ref:**	ANON-KU2U-GPUB-N	**Supporting Info**	Yes
Name	Steven Robb			**Email**	steven.robb@avisonyoung.com
Response Type	Agent / Consultant				
On behalf of:	Aldi Stores Ltd.				

Choice **1 C**

We want to identify areas that can be used for future water management to enable adaptation to climate change. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **1 D**

We want to clearly set out under what circumstances the development of poor quality or underused open space will be considered acceptable. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **1 E**

We want to introduce a new ‘extra-large green space standard’ which recognises that as we grow communities will need access to green spaces more than 5 hectares. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Customer Ref:	01734	Response Ref:	ANON-KU2U-GPUB-N	Supporting Info	Yes
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Response Type	Agent / Consultant				
On behalf of:	Aldi Stores Ltd.				

Choice **1 F**

We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **1 F**

We want to identify specific sites for new allotments and food growing, both as part of new development sites and within open space in the urban area. Do you agree with this? - Upload (max size 3mb)

Short Response No

Explanation

Choice **1 G**

We want to identify space for additional cemetery provision, including the potential for green and woodland burials. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Customer Ref:	01734	Response Ref:	ANON-KU2U-GPUB-N	Supporting Info	Yes
Name	Steven Robb			Email	steven.robb@avisonyoung.com
Response Type	Agent / Consultant				
On behalf of:	Aldi Stores Ltd.				

Choice **1 H**

We want to revise our existing policies and green space designations to ensure that new green spaces have long term maintenance and management arrangements in place. Do you agree with this? - Yes/No

Short Response Not Answered

Explanation Not Answered

Choice **2 A**

We want all development (including change of use), through design and access statements, to demonstrate how their design will incorporate measures to tackle and adapt to climate change, their future adaptability and measures to address accessibility for people with varying needs, age and mobility issues as a key part of their layouts. - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **2 B**

We want to revise our policies on density to ensure that we make best use of the limited space in our city and that sites are not under-developed. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Customer Ref:	01734	**Response Ref:**	ANON-KU2U-GPUB-N	**Supporting Info**	Yes
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Response Type	Agent / Consultant				
On behalf of:	Aldi Stores Ltd.				

Choice **2 C**

We want to revise our design and layout policies to achieve ensure their layouts deliver active travel and connectivity links. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **2 D**

We want all development, including student housing, to deliver quality open space and public realm, useable for a range of activities, including drying space, without losing densities. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **3 A**

We want all buildings and conversions to meet the zero carbon / platinum standards as set out in the current Scottish Building Regulations. Instead we could require new development to meet the bronze, silver or gold standard. Which standard should new development in Edinburgh meet? - Which standard?

Short Response Not Answered

Explanation Not Answered

Customer Ref:	01734	Response Ref:	ANON-KU2U-GPUB-N	Supporting Info	Yes
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Response Type	Agent / Consultant				
On behalf of:	Aldi Stores Ltd.				

Choice **4 A**

We want to work with local communities to prepare Place Briefs for areas and sites within City Plan 2030 highlighting the key elements of design, layout, and transport, education and healthcare infrastructure development should deliver. Do you agree with this? - Yes / No

Short Response	Not Answered
Explanation	Not Answered

Choice **4 B**

We want to support Local Place Plans being prepared by our communities. City Plan 2030 will set out how Local Place Plans can help us achieve great places and support community ambitions. - How should the Council work with local communities to prepare Local Place Plans?

Short Response	Not Answered
Explanation	Not Answered

Choice **5 A**

We want City Plan 2030 to direct development to where there is existing infrastructure capacity, including education, healthcare and sustainable transport, or where potential new infrastructure will be accommodated and deliverable within the plan period. Do you agree with this? - Yes / No

Short Response	Not Answered
Explanation	Not Answered

Customer Ref:	01734	Response Ref:	ANON-KU2U-GPUB-N	Supporting Info	Yes
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On behalf of:	Aldi Stores Ltd.				

Choice 5 B

We want City Plan 2030 to set out where new community facilities are needed, and that these must be well connected to active travel routes and in locations with high accessibility to good sustainable public transport services. Do you agree with this? - Yes / NO

Short Response: Not Answered

Explanation: Not Answered

Choice 5 C

We want to reflect the desire to co-locate our community services close to the communities they serve, supporting a high walk-in population and reducing the need to travel. Do you agree with this? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

Choice 5 D1

We want to set out in the plan where development will be expected to contribute toward new or expanded community infrastructure. Do you agree with this? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

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On behalf of:	Aldi Stores Ltd.				

Choice 5 D2

We want to use cumulative contribution zones to determine infrastructure actions, costs and delivery mechanisms. Do you agree with this? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

Choice 5 E

We want to stop using supplementary guidance and set out guidance for developer contributions within the plan, Action Programme and in non-statutory guidance. Do you agree with this? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

Choice 6 A

We want to create a new policy that assesses development against its ability to meet our targets for public transport usage and walking and cycling. These targets will vary according to the current or planned public transport services and high-quality active travel routes. Do you agree with this? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

Customer Ref:	01734	Response Ref:	ANON-KU2U-GPUB-N
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Name	Steven Robb	Email	steven.robb@avisonyoung.com
Response Type	Agent / Consultant		
On behalf of:	Aldi Stores Ltd.		

Choice **6 B**

We want to use Place Briefs to set the targets for trips by walking, cycling and public transport based on current and planned transit interventions. This will determine appropriate parking levels to support high use of public transport. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **7 A**

We want to determine parking levels in development based on targets for trips by walking, cycling and public transport. These targets could be set by area, development type, or both and will be supported by other measures to control on-street parking. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **7 B**

We want to protect against the development of additional car parking in the city centre to support the delivery of the Council's city centre transformation programme. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Customer Ref:	01734	**Response Ref:**	ANON-KU2U-GPUB-N	**Supporting Info**	Yes
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Response Type	Agent / Consultant				
On behalf of:	Aldi Stores Ltd.				

Choice **7 C**

We want to update our parking policies to control demand and to support parking for bikes, those with disabilities and electric vehicles via charging infrastructure. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **7 D**

We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan. Do you agree with this? - We want to support the city's park and ride infrastructure by safeguarding sites for new park and ride and extensions, including any other sites that are identified in the City Mobility Plan or its action plan.

Short Response Not Answered

Explanation Not Answered

Choice **8 A**

We want to update our policy on the Cycle and Footpath Network to provide criteria for identifying new routes. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Customer Ref: 01734 Response Ref: ANON-KU2U-GPUB-N Supporting Info Yes
Name Steven Robb Email steven.robb@avisonyoung.com
Response Type Agent / Consultant
On behalf of: Aldi Stores Ltd.

Choice **8 B**

As part of the City Centre Transformation and other Council and partner projects to improve strategic walking and cycling links around the city, we want to add the following routes (along with our existing safeguards) to our network as active travel proposals to ensure that they are delivered. Do you agree with this? - Yes / No

Short Response: Not Answered

Explanation:

Choice **8 C**

We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

Choice **8 C**

We want City Plan 2030 to safeguard and add any other strategic active travel links within any of the proposed options for allocated sites. We also want the City Plan 2030 to include any new strategic active travel links which may be identified in the forthcoming City Plan 2030 Transport Appraisal, the City Mobility Plan, or which are identified through this consultation. Do you agree with this? - Upload new cycle routes

Short Response: No

Explanation:

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Response Type	Agent / Consultant				
On behalf of:	Aldi Stores Ltd.				

Choice **9 A**

We want to consult on designating Edinburgh, or parts of Edinburgh, as a 'Short Term Let Control Area' where planning permission will always be required for the change of use of whole properties for short-term lets. Do you agree with this approach? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **9 B**

We want to create a new policy on the loss of homes to alternative uses. This new policy will be used when planning permission is required for a change of use of residential flats and houses to short-stay commercial visitor accommodation or other uses. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **10 A**

We want to revise our policy on purpose-built student housing. We want to ensure that student housing is delivered at the right scale and in the right locations, helps create sustainable communities and looks after student's wellbeing. Do you agree with this? - Yes / No

Short Response Not Answered

Explanation Not Answered

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Response Type	Agent / Consultant		
On behalf of:	Aldi Stores Ltd.		

Choice **10 B**

We want to create a new policy framework which sets out a requirement for housing on all sites over a certain size coming forward for development. Do you agree with this? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

Choice **10 C**

We want to create a new policy promoting the better use of stand-alone out of centre retail units and commercial centres, where their redevelopment for mixed use including housing would be supported. Do you agree with this? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

Choice **11 A**

We want to amend our policy to increase the provision of affordable housing requirement from 25% to 35%. Do you agree with this approach? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

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On behalf of:	Aldi Stores Ltd.				

Choice **11 B**

We want City Plan 2030 to require a mix of housing types and tenures – we want the plan to be prescriptive on the required mix, including the percentage requirement for family housing and support for the Private Rented Sector. Do you agree with this? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

Choice **12 A**

Which option do you support? - Option 1/2/3

Short Response: Not Answered

Explanation: Not Answered

Choice **12 B1**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - Calderwood

Short Response: Not Answered

Explanation:

Customer Ref: 01734 Response Ref: ANON-KU2U-GPUB-N Supporting Info Yes

Name Steven Robb Email steven.robb@avisonyoung.com

Response Type Agent / Consultant

On behalf of: Aldi Stores Ltd.

Choice **12 B2**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - Kirkliston

Short Response Not Answered

Explanation

Choice **12 B3**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - West Edinburgh

Short Response Not Answered

Explanation

Choice **12 B4**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - East of Riccarton

Short Response Not Answered

Explanation

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Response Type	Agent / Consultant				
On behalf of:	Aldi Stores Ltd.				

Choice **12 B5**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Support - South East Edinburgh

Short Response: Not Answered

Explanation

Choice **12 B6**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - Calderwood

Short Response: Not Answered

Explanation

Choice **12 B7**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - Kirkliston

Short Response: Not Answered

Explanation

Customer Ref:	01734	Response Ref:	ANON-KU2U-GPUB-N
Supporting Info	Yes		
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Choice **12 B8**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - West Edinburgh

Short Response: Not Answered

Explanation

Choice **12 B9**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - East of Riccarton

Short Response: Not Answered

Explanation

Choice **12 B10**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Support Greenfield - Object - South East Edinburgh

Short Response: Not Answered

Explanation

Customer Ref:	01734	Response Ref:	ANON-KU2U-GPUB-N	Supporting Info	Yes
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Response Type	Agent / Consultant				
On behalf of:	Aldi Stores Ltd.				

Choice **12 BX**

Do you support or object to any of the proposed greenfield areas? (Please tick all that apply) - Explain why

Short Response: Not Answered

Explanation: Not Answered

Choice **12 C**

Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload

Short Response: No

Explanation:

Choice **12 C**

Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload

Short Response: No

Explanation:

Customer Ref:	01734	**Response Ref:**	ANON-KU2U-GPUB-N
Supporting Info	Yes		
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On behalf of:	Aldi Stores Ltd.		

Choice **12 C**

Do you have a greenfield site you wish us to consider in the proposed Plan? - Greenfield file upload

Short Response No

Explanation

Choice **12 D**

Do you have a brownfield site you wish us to consider in the proposed Plan? - Brownfield sites upload

Short Response No

Explanation

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Response Type	Agent / Consultant				
On behalf of:	Aldi Stores Ltd.				

Choice **13 A**

We want to create a new policy that provides support for social enterprises, start-ups, culture and tourism, innovation and learning, and the low carbon sector, where there is a contribution to good growth for Edinburgh. Do you agree with this? - Yes / No

Short Response Yes

Explanation Choice 13 relates to the economic future of the city with reference to the City Council's Economic Strategy and ambitions to address issues associated with poverty and providing good and fair employment for citizens. In respect to these ambitions, Aldi fully supports these intentions and believes that they already make a significant contribution in this regard. Not only does the business provide direct employment, they also support jobs within the supply chain, with a number of Scottish sourced products coming from the Edinburgh and the Lothian's region. In addition, their low prices, which have helped suppress the cost of shopping across the UK supermarket sector, also benefit residents by providing access to healthy and affordable fruit and vegetables, which then improves the health and well-being of citizens. Please refer to earlier sections of this report where these benefits are all outlined. Moreover, as a successful business wishing to expand further across the capital these benefits would be extended further and to more communities within the city.Given the importance of retailing to the city economy, it is surprising that Choice 13 makes no reference to this in terms of the growth plans for the city. Retailing is a critical component of the economy, with research for the Scottish Government in 2011 (Assessing the Contribution of Retailing in Scotland (March 2011)) concluded that the sector provided 5% of Scotland's GVA, 10% of its turnover and 10% of its employment. These figures are likely to be similar for Edinburgh.

In light of this, we respectfully suggest that the importance of retailing to the city economy and its potential future contribution to realising the objectives set out within 'Choices' be fully recognised.

Choice **14 A**

We want City Plan 2030 to support the best use of existing public transport infrastructure in West Edinburgh and accommodate the development of a mix of uses to support inclusive, sustainable growth. We will do this through 'an area of search' which allows a wide consideration of future uses within West Edinburgh without being tied to individual sites. Do you support this approach? - Yes / No

Short Response Not Answered

Explanation Not Answered

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Response Type	Agent / Consultant		
On behalf of:	Aldi Stores Ltd.		

Choice **14 B**

We want to remove the safeguard in the existing plan for the Royal Highland Showground site to the south of the A8 at Norton Park and allocate the site for other uses. Do you agree with this approach? - Yes / No

Short Response	Not Answered
Explanation	Not Answered

Choice **14 C**

We want City Plan 2030 to allocate the Airport's contingency runway, the "crosswinds runway" for the development of alternative uses next to the Edinburgh Gateway interchange. Do you agree with this approach? - Yes / No

Short Response	Not Answered
Explanation	Not Answered

Customer Ref: 01734 Response Ref: ANON-KU2U-GPUB-N Supporting Info Yes

Name Steven Robb Email steven.robb@avisonyoung.com

Response Type Agent / Consultant

On behalf of: Aldi Stores Ltd.

Choice **15 A**

We want to continue to use the national ‘town centre first’ approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities. Do you agree with this? - Yes / No

Short Response Yes

Explanation These representations to “Choices for City Plan 2030” are prepared by Avison Young on behalf of Aldi Stores Ltd. As a successful retailer expanding across Scotland, Aldi continue to have ambitions to bring their award-winning retail offer to more communities across Edinburgh. These representations are prepared with those ambitions in mind to ensure that the planning policy framework in the city affords the potential for this scale of investment and job creation to be realised.Aldi supports these aims and is proud of its own efforts in line with the town centre first principle. These include looking firstly at opportunities within existing centres, when seeking to develop a new foodstore. Following consideration of these options, edge of centre sites and then commercial centres are considered in accordance with the sequential test.Over the past decade this has included developing stores within Local Centres such as Oxgangs and Chesser Avenue, running a store in Gorgie Town Centre, opening a store within Cameron Toll Shopping Centre, which is a Commercial Centre, and also developing a store in an ‘edge of centre’ site adjacent to Portobello Town Centre. Aldi recognises the value of opening stores in these locations to boost the vitality and viability of protected centres. Despite this, given the make-up and composition of some centres across the city this is not always feasible hence the development of ‘edge of centre’ locations. We note in the two examples provided above namely Oxgangs and Chesser, these were ‘edge of centre’ but following opening the boundaries of each Local Centre was expanded to incorporate the stores within them recognising their contribution to these areas which they help anchor. PLEASE REFER TO THE FULL SUBMITTED REPORT

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On behalf of:	Aldi Stores Ltd.				

Choice **15 B**

New shopping and leisure development will only be allowed within our town and local centres (including any new local centres) justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance. Do you agree? - Yes / No

Short Response No

Explanation

Ambition B relates to the development of new retail floorspace within the city and makes a number of points about how proposals will be assessed. These will be considered in turn.Firstly, we note the comment that again encourages development in accordance with the town centre first principle, which we have confirmed above our client fully supports. We note though that this states that proposals will only be permitted where it is justified by the Commercial Needs Study. Aldi finds this an unusual approach, given that if a proposal is located within or ‘edge of centre’, of a town or local centre, then SPP fully supports such development as it is of benefit to the health and vitality of these locations. This is equally true for ‘edge of centre’ locations which are given special status due to their ability to generate linked trips and reduce less sustainable shopping patterns to out of centre locations. We note for example that the Commercial Needs Study makes no provision for the development of any ‘edge of centre’ locations. It is difficult to understand how the public interest is best served by not permitting development on sites that would offer benefit to policy protected locations. Our client therefore strongly disagrees with the intentions behind Part B of Choice 15.In addition to this, it is quite relevant to consider the Commercial Needs Study further since the ‘Choices’ document notes that its findings will be increasingly important for decision making in the future. Commercial Needs Study (April 2019)We are aware that the Commercial Needs Study was commissioned to help plan for future shopping needs across Edinburgh for the period of the next Local Development Plan. The study is helpful in assessing future requirements in terms of both convenience and comparison floorspace that need planned for at a macro level, particularly given the extent of population growth anticipated within the city. This is where retail capacity studies are of most use.In terms of convenience retailing, one of the key findings of the document we note is that the city is considered to be “well-endowed with supermarkets and discount foodstores. The forecasts indicate no spare convenience expenditure capacity up to 2028, under both the low and high scenarios.” This means that the emerging LDP does not, except for within large areas of residential expansion, need new allocations made for supermarket floorspace. It does not however mean that there should be a policy to ban the development of additional retail floorspace, where this can be justified (typically through a retail impact assessment). We consider that this is best considered during the determination of planning applications and not set out explicitly within the development plan. The position set out within ‘Choices’ has no support within SPP.On this point, the author of the Retail Study supports this view at paragraph 7.4 when he discusses ‘Acceptable levels of retail impact.’ The report acknowledges that “Across Edinburgh as a whole, the scope for further new convenience floorspace will mostly be in the form of trade diversion from existing stores, and in opportunities to improve the quality, range and choice of convenience shopping.” This acknowledges that qualitative improvements can still be required in certain pockets across the city, given that qualitative deficiency is afforded the same level of weight within Scottish Planning Policy as quantitative matters (i.e. in respect of there being “no capacity”). It also acknowledges that there can be situations were acceptable levels of trade diversion can occur without undermining the vitality and viability of centres and that these can then be acceptable in policy terms. As set out in Section 3 of this Statement, competition is not a planning matter and it should not be for the planning system to protect existing out of centre

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retailers from this. This only limits choice for the consumer and protects existing retail outlets from competition. This cannot be in the public interest and protects incumbents only.The report concludes that section by stating that "This situation still presents opportunities to improve the quality, range and choice of existing convenience stores generally." We do not consider that this position has been accurately reflected within 'Choices' and requires reconsideration. The Deficiency TestWhilst it is acknowledged that the deficiency test currently forms part of Scottish Planning Policy, it is interesting to note why the 'need test', the English equivalent, was removed from that planning system and has not been brought back. As a general point some of the reasoning behind this is set out below, as it helps to explain why the position taken within 'Choices' is incorrect and anti-competitive.The first mention of removing the 'need test' in England was within the Barker review in 2006 which had been commissioned by the UK Government to review the operation of the planning system. (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228605/0118404857.pdf). In this regard, the Barker review commented that "This is particularly important as the current system of needs tests in town centre first policy also can have perverse effects: it protects incumbents and gives preference to operators that have lower sales densities. These incumbents may be operating in out-of-town shopping centres, leading to the effect that if need is demonstrated and there is no impact on the town centre, an existing out-of-town shopping centre could expand while there is no application for a sequentially preferable site in the town centre. Furthermore, incumbents may find it easier to expand incrementally while prospective local entrants fail at any one time to demonstrate sufficient need for a one-off increase of space. The needs test should therefore be removed." (AY emphasis)Barker's research identified that "It is not the role of local planning authorities to turn down development where they consider there to be a lack of market demand or need for the proposal. Investors who are risking their capital and whose business it is to assess likely customer demand are better placed than local authorities to determine the nature and scale of demand."Furthermore, Barker concluded that the impact test and sequential test were sufficient in themselves to protect centres, in line with Government ambitions. She stated that "The sequential and impact tests have roles to play here and should be maintained. But while there is a role for local authorities in assessing the likely future requirements (market demand) for more floorspace when preparing their development plans, it is not appropriate to turn down applications on the basis of there being no need. This is simply likely to result in more limited choice and higher prices of goods in stores – it restricts the expansion of stores beyond the town centre that could enter the market without harming the town centre itself." (AY emphasis)It is indeed unusual that the planning system only applies this 'need/deficiency' requirement to applications for new retail floorspace and no other land uses. For example, if another land use is considered such as office development or student housing, occupiers could both sell insurance/rent student accommodation and compete with one another freely. This in effect leads to better prices for consumers. The planning system doesn't control the expansion of these offices/student accommodation as the UK and Scotland is a free market economy. Similarly, if two retailers want to open up and compete, as long as there is no significant adverse impact on a town centre, they should be permitted to do so. It is difficult to identify how the public interest is served by preventing this and why exclusively for retail land use only. Beyond the Barker review, Clifford Guy commented in 2007 on the issues surrounding the test in the journal article Is 'Demonstration of Need' Necessary in Retail Planning Policy?, Regional Studies, 41:1, 131-137, DOI: 10.1080/00343400600990467. Guy concludes that "It can be argued that the quantitative need criterion here acts to restrict competition between retailers, thus violating one of the main objectives of retail planning policy". Moreover, Guy agrees that "The conclusion can be drawn therefore that policies relating to 'need' assessment could be simplified in future government guidelines on retail planning. Quantitative need appears to be in most circumstances a redundant criterion. While demonstration of spare capacity and/or outshopping may be a useful tactic to support a retail proposal, it seems unnecessary for the applicant to have to demonstrate quantitative need as a fundamental part of his/her case. Focusing simply on impact is consistent with long-established practice."These comments were in line with the Competition Commission's analysis of the UK supermarket sector in 2009 when commenting on the benefits of a competitive supermarket sector. (Link:

Customer Ref:	01734	**Response Ref:**	ANON-KU2U-GPUB-N	**Supporting Info**	Yes
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On behalf of:	Aldi Stores Ltd.				

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https://webarchive.nationalarchives.gov.uk/20140402235650/http://www.competition-commission.org.uk/assets/competitioncommission/docs/pdf/inquiry/ref2009/groceries_remittal/pdf/final_decision.pdf). The Competition Commission observed at paragraph 4.4 of their report that “the greater the degree of local competition faced by a store, the lower will be that store’s variable profit margin, since it will be incentivized to provide a better offer to consumers to avoid consumers switching. When local competition is greater, grocery retailers will also have an incentive to improve those aspects of their retail offers that are set nationally including, in particular, their grocery prices.”(AY emphsasis)It also observed that the planning system can act as a barrier to this, as it is easier for an incumbent to extend their store and prevent new entrants into markets, thereby limiting competition. See paragraphs 4.5-4.7 of their findings for more detail.Example Case StudyAs a final example as to why reliance on the deficiency test alone is not successful, is a scenario where an operator wished to develop a store in an ‘edge of centre’ location, they will be required to still address this test. By locating a store in this area, there will be benefits in terms of generating linked trips with a defined centre, thereby supporting its vitality and viability. These benefits have been recognised in the Scottish Government’s report Town Centres and Retailing Methodologies from 2007.

However, due to the presence of a number of ‘out of centre’ competitors in this scenario and based on the Commercial Needs Study there could be deemed to be no capacity/deficiency to accommodate an additional store. The planning application could therefore be refused on that basis even if there was to be no impact on the policy protected centre. This is clearly not a good outcome and not helpful for delivering many of the other ambitions set out within Scottish Planning Policy or the objectives behind ‘Choices’, concerning town centres or delivering sustainable economic growth. This is just one example as to why the current focus is not appropriate and indeed, harmful to city residents.ConclusionsIn short, we strongly believe that the focus set out in ‘Choices’ on capacity is incorrect and damaging for consumers given that there can be many circumstances where a new proposal would be acceptable in local areas. These considerations are best served through retail impact assessments submitted with planning applications, as recognised by the Commercial Needs Study at paragraph 7.4. Our evidence of high levels of public support frequently provided at consultation events at the prospect of additional retail choice opening in local areas also strongly supports this view. Assessments of retail capacity within development planning is a helpful tool as it allows for proactive planning to meet future needs as a result of residential expansion, however, as policy tool in development management it is considered unnecessary and prevents innovation and fair competition.As a result, we consider that policies in respect to new retail development should conform with SPP and continue in accordance with the adopted LDP. It is not appropriate to be overly prescriptive and base this only the findings of a city-wide retail capacity model.PLEASE REFER TO THE FULL SUBMITTED REPORT

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On behalf of:	Aldi Stores Ltd.				

Choice **15 C**

We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan. Do you agree? - Yes / No

Short Response Yes

Explanation Aldi welcome this intention and believe just as in past reviews of development plans, there are opportunities to recognise the benefits of ‘edge of centre’ stores, given their contribution to the vitality and viability of areas. In this regard, our client suggests that the town centre boundary for Portobello be extended to incorporate the Aldi store. Not only does this foodstore represent the main convenience offer, it is also within a short walking distance and the car park affords opportunities for linked trips to the Town Centre, for those visiting by car.

Choice **15 D**

We want to continue to prepare and update supplementary guidance for our town centres to adapt to changing retail patterns and trends, and ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking. Instead we could stop using supplementary guidance for town centres and set out guidance within the plan. Which approach do you support? - Yes / No

Short Response The use of Supple

Explanation Finally, Aldi also welcome the use of supplementary guidance to help support the vitality and viability of town centres. As important contributors to services for local people, our client suggests that these be extended to local centres across the city too.

Customer Ref: 01734 Response Ref: ANON-KU2U-GPUB-N Supporting Info Yes
Name Steven Robb Email steven.robb@avisonyoung.com
Response Type Agent / Consultant
On behalf of: Aldi Stores Ltd.

Choice **15 E**

We want to support new hotel provision in local, town, commercial centres and other locations with good public transport access throughout Edinburgh. Do you agree with this approach? - Yes / No

Short Response: Not Answered

Explanation: No comment.

Choice **15 G**

We could also seek to reduce the quantity of retail floorspace within centres in favour of alternative uses such as increased leisure provision and permit commercial centres to accommodate any growing demand. Do you agree with this approach? - Yes / No

Short Response: Not Answered

Explanation: No comment.

Choice **16 A1**

We want to continue to support office use at strategic office locations at Edinburgh Park/South Gyle, the International Business Gateway, Leith, the city centre, and in town and local centres. Do you agree? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

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Choice **16 A2**

We want to support office development at commercial centres as these also provide accessible locations. - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **16 A3**

We want to strengthen the requirement within the city centre to provide significant office floorspace within major mixed-use developments. Do you agree? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **16 A4**

We want to amend the boundary of the Leith strategic office location to remove areas with residential development consent. Do you agree? - Yes / No

Short Response Not Answered

Explanation Not Answered

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On behalf of:	Aldi Stores Ltd.		

Choice **16 A5**

We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **16 A5**

We want to continue to support office development in other accessible locations elsewhere in the urban area. Do you agree? - Do you have an office site you wish us to consider in the proposed Plan?

Short Response

Explanation

Choice **16 B**

We want to identify sites and locations within Edinburgh with potential for office development. Do you agree with this? - Yes/No

Short Response Not Answered

Explanation Not Answered

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On behalf of:	Aldi Stores Ltd.				

Choice **16 C**

We want to introduce a loss of office policy to retain accessible office accommodation. This would not permit the redevelopment of office buildings other than for office use, unless existing office space is provided as part of denser development. This would apply across the city to recognise that office locations outwith the city centre and strategic office locations are important in meeting the needs of the mid-market. Or we could Introduce a 'loss of office' policy only in the city centre. - Yes / No

Short Response Not Answered

Explanation Not Answered

Choice **16 E1**

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Leith Strategic Business Centre

Short Response Not Answered

Explanation

Choice **16 E2**

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Newbridge

Short Response Not Answered

Explanation

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Choice **16 E3**

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - Newcraighall Industrial Estate.

Short Response Not Answered

Explanation

Choice **16 E4**

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Support - The Crosswinds Runway

Short Response Not Answered

Explanation

Choice **16 E5**

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Leith Strategic Business Centre

Short Response Not Answered

Explanation

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On behalf of: Aldi Stores Ltd.

Choice **16 E6**

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Newbridge

Short Response: Not Answered

Explanation

Choice **16 E7**

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - Newcraighall Industrial Estate.

Short Response: Not Answered

Explanation

Choice **16 E8**

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Yes / No - Do not support - The Crosswinds Runway

Short Response: Not Answered

Explanation

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Response Type: Agent / Consultant
On behalf of: Aldi Stores Ltd.

Choice **16 EX**

We want to identify proposals for new modern business and industrial sites to provide necessary floorspace at the following locations. Do you agree? - Explain why

Short Response: Not Answered

Explanation: Not Answered

Choice **16 F**

We want to ensure new business space is provided as part of the redevelopment of urban sites and considered in Place Briefs for greenfield sites. We want to set out the amount expected to be re-provided, clearer criteria on what constitutes flexible business space, and how to deliver it, including the location on-site, and considering adjacent uses, servicing and visibility. Do you agree? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

Choice **16 G**

We want to continue to protect industrial estates that are designated under our current policy on Employment Sites and Premises (Emp 8). Do you agree? - Yes / No

Short Response: Not Answered

Explanation: Not Answered

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Choice **16 H**

We want to introduce a policy that provides criteria for locations that we would support city-wide and neighbourhood goods distribution hubs. Do you agree? - Yes / No

Short Response	Not Answered
Explanation	Not Answered

AVISON YOUNG

ALDI

Representations to 'Choices for City Plan 2030'

On behalf of Aldi Stores Ltd

March 2020

Contents

Prepared By: Steve Robb
Status: FINAL
Draft Date: March 2020

1. Introduction

1.1 These representations to "Choices for City Plan 2030" are prepared by Avison Young on behalf of Aldi Stores Ltd.

1.2 As a successful retailer expanding across Scotland, Aldi continue to have ambitions to bring their award-winning retail offer to more communities across Edinburgh. These representations are prepared with those ambitions in mind to ensure that the planning policy framework in the city affords the potential for this scale of investment and job creation to be realised.

Structure and scope of representations

1.3 Our representations relate primarily to Choice 15 in respect of Protecting Our City Centre, Town Centres and Local Centres. Other comments are also made in respect of Choice 13 in relation to supporting economic growth. In doing so, this report comprises the following sections:

- Section 2: Background to Aldi Stores Ltd
- Section 3: Aldi in the UK and Edinburgh
- Section 4: Representations to Choice 15 – Protecting Our City Centre, Town Centres and Local Centres
- Section 5: Representations to Choice 13 – Supporting Inclusive Growth
- Section 6: Summary and Conclusions.

1.4 A summary of our representation is provided below insofar as these relate to each choice.

Choice 15 – Protecting Our City Centre, Town Centres and Local Centres

- Aldi Stores Ltd supports the intention to adhere to, in line with SPP, the town centre first principle to protect Edinburgh's network of centres. The business already has a number of stores within or on the edge of these areas, each supporting their local area's vitality and viability.
- As with recent decisions made as part of the last LDP to bring their stores into the boundaries of centres, like in Oxgangs and Chesser, Aldi request that the Portobello Town Centre be extend to incorporate their store given the contribution they make to the vitality and viability of the centre.
- Aldi do not agree that decision making on new retail development proposals should be based on a city-wide capacity model. Instead they consider that this is better left for individual retail impact assessments submitted in support of planning applications, as these will more specifically look at the retail context within local areas. This is in fact what the Commercial Needs Study also advises, when it refers to 'Acceptable levels of retail impact'.
- Moreover, Aldi does not agree with the above approach, given that it limits competition and consumer choice which are both within the public interest. There are significant pieces of research in support of this view.

- Aldi wish to expand their presence across the city in future years, to bring their award-winning and highly popular offer to more communities in Edinburgh. Ensuring the right planning policy framework is in place, in accordance with SPP, is important to help deliver this.

Choice 12 – Supporting Inclusive Growth

- Retailing forms a significant part of the city economy, in supporting jobs and investment whilst also providing the population with access to high quality products at low prices. This is especially important given the overall aims to reduce inequality across the city. The importance of the retail sector to the city economy is not given any recognition within Choice 12, or indeed Choice 15, and Aldi request that this be incorporated within the LDP.

2. Background to 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 750 stores across England, Scotland and Wales. Within Scotland, there are now 91 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 won the award for Best Grocer 2019 and Best Own Brand Range/Product 2019 at the Retail Week Awards. Good Housekeeping readers also named Aldi their Favourite Supermarket 2019 and Moneywise voted us Best Value for Money Supermarket 2019.

2.4 For recognition of investment in people, Aldi is 3rd in the Times Top 100 List of Graduate Employers for 2019/2020, placing the business 1st amongst retailers. They are also the Times Top Graduate Employer of Choice for Retailing.

How Aldi is different

2.5 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.

2.6 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.

2.7 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.

2.8 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.

2.9 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.

2.10 The deliberate intention is to restrict the range of core goods to approximately 1,500 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.

2.11 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 – 1,500sq.m 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.

2.12 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 of the milk and cream in their Scottish stores are sourced from Scottish dairy farmers.

2.13 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.

2.14 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.

Catchment

2.15 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. The catchment for a new store is localised and often shoppers to a new Aldi store are existing Aldi customers who have been travelling to their nearest store, but with a new store opening close by, this can reduce the need to travel.

2.16 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.

Accessibility

2.17 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 cycling as a mode of transport.

2.18 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.

Job creation and training

2.19 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.

2.20 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.

2.21 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.

2.22 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, as well as cleaners and labourers.

3. Aldi in the UK, Scotland and Edinburgh

Aldi in the UK

3.1 Aldi's success in recent years has helped to re-shape the grocery market across the UK. For many years the sector was heavily dominated by 4 major retailers (ASDA, Morrisons, Sainsbury's and Tesco), however over the last decade expanding competition from others, including Aldi, has radically altered the food shopping landscape. This change was a result of a range of factors.

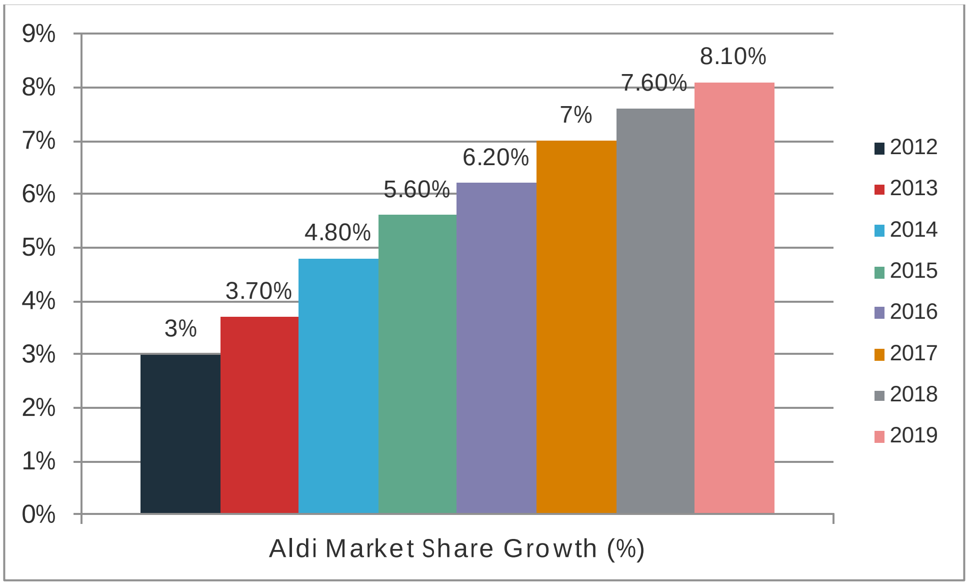
3.2 Firstly, there has been a trend over the past decade that has witnessed food shopping occur more regularly moving from one large shop a week, to regular visits across a range of conveniently located food shops within local vicinities. The retail landscape also witnessed shoppers becoming even more discerning about securing value from their food shop, with some of this brought about by the 2008 economic turbulence.

3.3 This change in shopping patterns is evident when market shares for the major supermarket retailers are considered as shown below.

UK Grocery Market Shares 2012-19								
	12 weeks to 19 August 2012	12 weeks to 17 August 2013	12 weeks to 18 August 2014	12 weeks to 16 August 2015	12 weeks to 14 August 2016	12 weeks to 13 August 2017	12 weeks to 12 August 2018	12 weeks to 11 August 2019
Tesco	30.9%	30.2%	28.8%	28.3%	28.1%	27.8%	27.4%	27%
Sainsbury's	16.4%	16.5%	16.4%	16.3%	16.1%	15.8%	15.5%	15.4%
Asda	17.5%	17.1%	17.2%	16.6%	15.7%	15.3%	15.2%	14.9%
Morrisons	11.5%	11.3%	11%	10.8%	10.6%	10.4%	10.4%	10.1%
Aldi	3%	3.7%	4.8%	5.6%	6.2%	7%	7.6%	8.1%
The Cooperative	6.8%	6.6%	6.4%	6.4%	6.6%	6.3%	6.6%	6.6
Lidl	2.8%	3.1%	3.6%	4.1%	4.5%	5.2%	5.5%	5.9%
Waitrose	4.6%	4.8%	4.9%	5.1%	5.1%	5.1%	5%	4.9%
Iceland	2%	2%	2%	2%	2.1%	2.1%	2.1%	2.1%
Other	1.9%	1.9%	2.1%	2.8%	3.1%	1.4%	1.8%	1.9%

Source:https://www.statista.com/statistics/300656/grocery-market-share-in-great-britain-year-on-year-comparison/

3.4 Focusing more specifically on Aldi, the bar chart below demonstrates the business' exponential growth over this period, indicating their increasing popularity with shoppers.



3.5 It is therefore evident that over time consumer shopping patterns do evolve and with that it stands to reason that the planning system should be sufficiently flexible to accommodate this and allow these trends to occur, given that competition is not a matter for consideration when exercising planning judgement in determining planning applications. Instead the key determining factor should be protecting city, town and local centres in accordance with the town centre first principle established by SPP. It is the case that too often the focus is misplaced when assessments are given of the 'need' for a new supermarket within an area, rather than the benefits that can be realised, particularly where impact levels on protected centres are acceptable.

3.6 In light of the above evidence on the natural change that occurs in retailing trends, we do not consider the comments under Choice 15 truly respect this reality and indeed, believe the document seeks to use the planning system to exert undue influence over the market and in effect, protects existing retailers from competition. This can lead to uncompetitive pricing and limits choice for the consumer.

3.7 It is clear that if misdirected this aim would stray beyond the intended role of the planning system, which has recently been re-established by the Planning (Scotland) Act 2019. This states that "*The purpose of planning is to manage the development and use of land in the long term public interest*". With this in mind, it is difficult to understand why limiting choice and competition is necessary for supermarket retailing, when not applied to any other sectors of land use. These themes will be revisited in latter sections of this representation.

Aldi in Scotland

3.8 Aldi have invested significantly across Scotland in the last 12 years, yielding significant benefits in terms of delivering investment, regeneration and sustainable economic growth to communities over the country. A number of these benefits will be described below.

3.9 Since opening its first store in Scotland in 1994, the grocer has expanded to 91 stores across the country, with plans to continue this growth in future years to reach new communities. As it continues to expand, Aldi attracts millions of new customers and redefines attitudes to food shopping by offering the lowest prices without compromising on quality.

3.10 Aldi commissioned the Centre for Economic and Business Research (Cebr) in 2016 to quantify their contribution to the Scottish economy. At that point the research confirmed that in 2016 the retailer contributed £380 million to the Scottish economy. This included £169m from merchandise supply chain (exports), £127m for retail operations, £75m for the merchandise supply chain (domestic) and £9m from taxes on products.

3.11 Aldi contributed £27.4m in tax that year and supported overall 7,800 jobs in the Scottish economy, generating £214m in wages. Therefore for every £100 of GVA generated by Aldi they created an additional £375 of GVA for the Scottish economy.

3.12 In terms of employment, from 2005 to 2016, Aldi grew from 216 employees to 2,100 jobs in 2016 in Scotland. For every one job at Aldi, 3.75 jobs were supported in the Scottish economy. Furthermore, in terms of remuneration, Aldi pays staff above the living wage, with award-winning training and career opportunities available.

3.13 Beyond direct employment, Aldi also works closely with a number of food and drink producers across Scotland. Close-working and long-term partnerships with Scottish businesses are fundamental to Aldi's success. It enables Aldi and its suppliers to achieve fair and consistent prices, which translates into everyday value for consumers.

3.14 Transparent treatment of suppliers applies to both merchandise (what Aldi sells in its stores) and non-merchandise (what Aldi needs to run the retail operation itself) supply chains. In June 2017 Aldi topped The Groceries Code Adjudicator (GCA) supplier survey for the fourth consecutive year.

3.15 £244m in GVA to GDP was contributed to the Scottish economy by working with Scottish suppliers. £73m in GVA contribution to GDP was also generated through Scottish-sourced products in Scottish stores. £169m in GVA contribution to GDP was generated by selling Scottish-sourced products in Aldi's UK and Ireland stores. Indeed, in 2016, 22% of store sales in Scotland were generated from selling Scottish-sourced products. It is therefore clear that the business makes a significant contribution to the Scottish economy and these benefits have been realised as a result of their store expansion, that is so popular with shoppers, across the country.

Aldi in Edinburgh

3.16 Over the last ten years Aldi have also expanded their presence in Edinburgh. Their current stores include (and shown on map below):

- Gorgie
- Chesser Avenue
- Cameron Toll
- Gilmerton Road
- Oxgangs
- Portobello

- Dock Street, Leith (under construction)

3.17 By providing up to 35 jobs per store, Aldi's presence in Edinburgh directly supports approx. 200 jobs with this due to increase with the opening of the Dock Street store later this year. In addition to this, the business also supports Scottish suppliers in the Edinburgh and Lothian's regions covering product ranges like soups, alcoholic beverages, biscuits and porridge. There are therefore significant employment benefits for the city from the presence of these stores.

3.18 The popularity of the stores with the public in Edinburgh is evident when considering the Commercial Needs Study (April 2019). It is also clear from the original public consultation exercises undertaken with local communities prior to submitting planning applications. This information was gathered from public events that were undertaken prior to the submission of planning applications for new stores at Oxgangs, Portobello, Gilmerton Road and Dock Street from 2012 to 2015. The outcomes are set out in the table below:

ALDI FEEDBACK FROM PUBLIC CONSULTATION EVENTS

Store	Year	Number of Attendees at Exhibition	% of Support	% of Neutral	% of Not Supporting
Gilmerton Road	2012	250	62%	22%	16%
Portobello	2014	350	71%	18%	11%
Oxgangs	2014	400	75%	8%	17%
Dock Street, Leith	2015	200	91%	9%	0%

3.19 As can be seen from the table above, not only do Aldi's efforts to engage with the public about a new store development yield significant attendees at their exhibitions but these findings also reveal the substantial body of support they receive from communities. Indeed, despite there having been a suggestion as far back as 2011 that there are enough supermarkets across the city, as identified by the 'Access to Supermarkets and Food Shopping' report by the City Council, these findings provide a different perspective.

3.20 It is also the case that if a business decides to invest significantly to develop a store and enter into a local market, then they must believe that there is scope for them to be present and it should not be for the planning system to decide if that's correct or not, except where there is a significant adverse impact on protected centres. These findings therefore run contrary to the general idea that the city has no more space for additional foodstore choice and that it is not in the public's interest to see these delivered.

3.21 Aldi wish to continue to reach further communities across the city and aim to develop a further 6 stores in future. These cover locations such as South Queensferry, Currie/Balerno, Morningside, Meadowbank, the city centre, Corstorphine and Craigleith where the business knows there are demands for access to their offer. Local residents are frequently in touch with Aldi to request they build a store within their area, running contrary to the main thrust of comment within the Edinburgh 'Choices' document. Our specific comments on this are provided in the next section.

4. Choice 15 – Protecting our City Centre, Town Centres and Local Centres

4.1 Choices for City Plan 2030 at Choice 15 sets out an ambition for the next Local Development Plan that aligns with national policy set out within SPP in support of the town centre first principle, alongside other objectives listed A to E. These will be considered in turn.

A - We want to continue to use the national 'town centre first' approach. City Plan 2030 will protect and enhance the city centre as the regional core of south east Scotland providing shopping, commercial leisure, and entertainment and tourism activities.

4.2 Aldi supports these aims and is proud of its own efforts in line with the town centre first principle. These include looking firstly at opportunities within existing centres, when seeking to develop a new foodstore. Following consideration of these options, edge of centre sites and then commercial centres are considered in accordance with the sequential test.

4.3 Over the past decade this has included developing stores within Local Centres such as Oxgangs and Chesser Avenue, running a store in Gorgie Town Centre, opening a store within Cameron Toll Shopping Centre, which is a Commercial Centre, and also developing a store in an 'edge of centre' site adjacent to Portobello Town Centre.

4.4 Aldi recognises the value of opening stores in these locations to boost the vitality and viability of protected centres. Despite this, given the make-up and composition of some centres across the city this is not always feasible hence the development of 'edge of centre' locations. We note in the two examples provided above namely Oxgangs and Chesser, these were 'edge of centre' but following opening the boundaries of each Local Centre was expanded to incorporate the stores within them recognising their contribution to these areas which they help anchor.

B - We will also support and strengthen our other town and local centres (including any new local centres) by ensuring that new shopping and leisure development is directed to them and only permitted where justified by the Commercial Needs study. Outwith local centres, small scale proposals will be permitted only in areas where there is evidence of a lack of food shopping within walking distance.

4.5 Ambition B relates to the development of new retail floorspace within the city and makes a number of points about how proposals will be assessed. These will be considered in turn.

4.6 Firstly, we note the comment that again encourages development in accordance with the town centre first principle, which we have confirmed above our client fully supports. We note though that this states that proposals will only be permitted where it is justified by the Commercial Needs Study. Aldi finds this an unusual approach, given that if a proposal is located within or 'edge of centre', of a town or local centre, then SPP fully supports such development as it is of benefit to the health and vitality of these locations. This is equally true for 'edge of centre' locations which are given special status due to their ability to generate linked trips and reduce less sustainable shopping patterns to out of centre locations. We note for example that the Commercial Needs Study makes no provision for the development of any 'edge of centre' locations. It is difficult to understand how the public interest is best served by not permitting development on sites that would offer benefit to policy protected locations. Our client therefore strongly disagrees with the intentions behind Part B of Choice 15.

4.7 In addition to this, it is quite relevant to consider the Commercial Needs Study further since the 'Choices' document notes that its findings will be increasingly important for decision making in the future.

Commercial Needs Study (April 2019)

4.8 We are aware that the Commercial Needs Study was commissioned to help plan for future shopping needs across Edinburgh for the period of the next Local Development Plan. The study is helpful in assessing future requirements in terms of both convenience and comparison floorspace that need planned for at a macro level, particularly given the extent of population growth anticipated within the city. This is where retail capacity studies are of most use.

4.9 In terms of convenience retailing, one of the key findings of the document we note is that the city is considered to be *"well-endowed with supermarkets and discount foodstores. The forecasts indicate no spare convenience expenditure capacity up to 2028, under both the low and high scenarios."* This means that the emerging LDP does not, except for within large areas of residential expansion, need new allocations made for supermarket floorspace. It does not however mean that there should be a policy to ban the development of additional retail floorspace, where this can be justified (typically through a retail impact assessment). We consider that this is best considered during the determination of planning applications and not set out explicitly within the development plan. The position set out within 'Choices' has no support within SPP.

4.10 On this point, the author of the Retail Study supports this view at paragraph 7.4 when he discusses 'Acceptable levels of retail impact.' The report acknowledges that *"Across Edinburgh as a whole, the scope for further new convenience floorspace will mostly be in the form of trade diversion from existing stores, and in opportunities to improve the quality, range and choice of convenience shopping."*

4.11 This acknowledges that qualitative improvements can still be required in certain pockets across the city, given that qualitative deficiency is afforded the same level of weight within Scottish Planning Policy as quantitative matters (i.e. in respect of there being "no capacity").

4.12 It also acknowledges that there can be situations were acceptable levels of trade diversion can occur without undermining the vitality and viability of centres and that these can then be acceptable in policy terms. As set out in Section 3 of this Statement, competition is not a planning matter and it should not be for the planning system to protect existing out of centre retailers from this. This only limits choice for the consumer and protects existing retail outlets from competition. This cannot be in the public interest and protects incumbents only.

4.13 The report concludes that section by stating that *"This situation still presents opportunities to improve the quality, range and choice of existing convenience stores generally."* We do not consider that this position has been accurately reflected within 'Choices' and requires reconsideration.

The Deficiency Test

4.14 Whilst it is acknowledged that the deficiency test currently forms part of Scottish Planning Policy, it is interesting to note why the 'need test', the English equivalent, was removed from that planning system and has not been brought back. As a general point some of the reasoning behind this is set out below, as it helps to explain why the position taken within 'Choices' is incorrect and anti-competitive.

4.15 The first mention of removing the 'need test' in England was within the Barker review in 2006 which had been commissioned by the UK Government to review the operation of the planning system. (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/228605/0118404857.pdf). In this regard, the Barker review commented that *"This is particularly important as the current system of needs tests in town centre first policy also can have perverse effects: it protects incumbents and gives preference to operators that have lower sales densities. These incumbents may be operating in out-of-town shopping centres, leading to the effect that if need is demonstrated and there is no impact on the town centre, an existing out-of-town shopping centre could expand while there is no application for a sequentially preferable site in the town centre. Furthermore, incumbents may find it easier to expand incrementally while prospective local entrants fail at any one time to demonstrate sufficient need for a one-off increase of space. The needs test should therefore be removed." (AY emphasis)*

4.16 Barker's research identified that *"It is not the role of local planning authorities to turn down development where they consider there to be a lack of market demand or need for the proposal. Investors who are risking their capital and whose business it is to assess likely customer demand are better placed than local authorities to determine the nature and scale of demand."*

4.17 Furthermore, Barker concluded that the impact test and sequential test were sufficient in themselves to protect centres, in line with Government ambitions. She stated that *"The sequential and impact tests have roles to play here and should be maintained. But while there is a role for local authorities in assessing the likely future requirements (market demand) for more floorspace when preparing their development plans, it is not appropriate to turn down applications on the basis of there being no need. This is simply likely to result in more limited choice and higher prices of goods in stores – it restricts the expansion of stores beyond the town centre that could enter the market without harming the town centre itself." (AY emphasis)*

4.18 It is indeed unusual that the planning system only applies this 'need/deficiency' requirement to applications for new retail floorspace and no other land uses. For example, if another land use is considered such as office development or student housing, occupiers could both sell insurance/rent student accommodation and compete with one another freely. This in effect leads to better prices for consumers. The planning system doesn't control the expansion of these offices/student accommodation as the UK and Scotland is a free market economy. Similarly, if two retailers want to open up and compete, as long as there is no significant adverse impact on a town centre, they should be permitted to do so. It is difficult to identify how the public interest is served by preventing this and why exclusively for retail land use only.

4.19 Beyond the Barker review, Clifford Guy commented in 2007 on the issues surrounding the test in the journal article Is 'Demonstration of Need' Necessary in Retail Planning Policy?, Regional Studies, 41:1, 131-137, DOI: 10.1080/00343400600990467. Guy concludes that *"It can be argued that the quantitative need criterion here* *acts to restrict competition between retailers, thus violating one of the main objectives of retail planning policy".*

4.20 Moreover, Guy agrees that *"The conclusion can be drawn therefore that policies relating to 'need' assessment could be simplified in future government guidelines on retail planning. Quantitative need appears to be in most circumstances a redundant criterion. While demonstration of spare capacity and/or outshopping may be a useful tactic to support a retail proposal, it seems unnecessary for the applicant to have to demonstrate quantitative need as a fundamental part of his/her case. Focusing simply on impact is consistent with long-established practice."*

4.21 These comments were in line with the Competition Commission's analysis of the UK supermarket sector in 2009 when commenting on the benefits of a competitive supermarket sector.

(Link: https://webarchive.nationalarchives.gov.uk/20140402235650/http://www.competition-commission.org.uk/assets/competitioncommission/docs/pdf/inquiry/ref2009/groceries_remittal/pdf/final_decision.pdf).

4.22 The Competition Commission observed at paragraph 4.4 of their report that *"the greater the degree of local competition faced by a store, the lower will be that store's variable profit margin, since it will be incentivized to provide a better offer to consumers to avoid consumers switching. <u>When local competition is greater, grocery retailers will also have an incentive to improve those aspects of their retail offers that are set nationally including, in particular, their grocery prices</u>."(AY emphsasis)*

4.23 It also observed that the planning system can act as a barrier to this, as it is easier for an incumbent to extend their store and prevent new entrants into markets, thereby limiting competition. See paragraphs 4.5-4.7 of their findings for more detail.

Example Case Study

4.1 As a final example as to why reliance on the deficiency test alone is not successful, is a scenario where an operator wished to develop a store in an 'edge of centre' location, they will be required to still address this test. By locating a store in this area, there will be benefits in terms of generating linked trips with a defined centre, thereby supporting its vitality and viability. These benefits have been recognised in the Scottish Government's report Town Centres and Retailing Methodologies from 2007.

4.2 However, due to the presence of a number of 'out of centre' competitors in this scenario and based on the Commercial Needs Study there could be deemed to be no capacity/deficiency to accommodate an additional store. The planning application could therefore be refused on that basis even if there was to be no impact on the policy protected centre. This is clearly not a good outcome and not helpful for delivering many of the other ambitions set out within Scottish Planning Policy or the objectives behind 'Choices', concerning town centres or delivering sustainable economic growth. This is just one example as to why the current focus is not appropriate and indeed, harmful to city residents.

Conclusions

4.3 In short, we strongly believe that the focus set out in 'Choices' on capacity is incorrect and damaging for consumers given that there can be many circumstances where a new proposal would be acceptable in local areas. These considerations are best served through retail impact assessments submitted with planning applications, as recognised by the Commercial Needs Study at paragraph 7.4. Our evidence of high levels of public support frequently provided at consultation events at the prospect of additional retail choice opening in local areas also strongly supports this view.

4.4 Assessments of retail capacity within development planning is a helpful tool as it allows for proactive planning to meet future needs as a result of residential expansion, however, as policy tool in development management it is considered unnecessary and prevents innovation and fair competition.

4.5 As a result, we consider that policies in respect to new retail development should conform with SPP and continue in accordance with the adopted LDP. It is not appropriate to be overly prescriptive and base this only the findings of a city-wide retail capacity model.

C - We want to review our existing town and local centres including the potential for new identified centres and boundary changes where they support walking and cycling access to local services in outer areas, consistent with the outcomes of the City Mobility Plan.

4.6 Aldi welcome this intention and believe just as in past reviews of development plans, there are opportunities to recognise the benefits of 'edge of centre' stores, given their contribution to the vitality and viability of areas. In this regard, our client suggests that the town centre boundary for Portobello be extended to incorporate the Aldi store. Not only does this foodstore represent the main convenience offer, it is also within a short walking distance and the car park affords opportunities for linked trips to the Town Centre, for those visiting by car.

D - We also want to continue to prepare and update supplementary guidance tailored to the city centre and individual town centres. The use of supplementary guidance allows us to adapt to changing retail patterns and trends over the period of the plan. It also helps us ensure an appropriate balance of uses within our centres to maintain their vitality, viability and deliver good placemaking.

4.7 Finally, Aldi also welcome the use of supplementary guidance to help support the vitality and viability of town centres. As important contributors to services for local people, our client suggests that these be extended to local centres across the city too.

5. Choice 13 - Supporting inclusive growth, innovation, universities, & culture

5.1 Choice 13 relates to the economic future of the city with reference to the City Council's Economic Strategy and ambitions to address issues associated with poverty and providing good and fair employment for citizens.

5.2 In respect to these ambitions, Aldi fully supports these intentions and believes that they already make a significant contribution in this regard. Not only does the business provide direct employment, they also support jobs within the supply chain, with a number of Scottish sourced products coming from the Edinburgh and the Lothian's region. In addition, their low prices, which have helped suppress the cost of shopping across the UK supermarket sector, also benefit residents by providing access to healthy and affordable fruit and vegetables, which then improves the health and well-being of citizens. Please refer to earlier sections of this report where these benefits are all outlined.

5.3 Moreover, as a successful business wishing to expand further across the capital these benefits would be extended further and to more communities within the city.

5.4 Given the importance of retailing to the city economy, it is surprising that Choice 13 makes no reference to this in terms of the growth plans for the city. Retailing is a critical component of the economy, with research for the Scottish Government in 2011 (Assessing the Contribution of Retailing in Scotland (March 2011)) concluded that the sector provided 5% of Scotland's GVA, 10% of its turnover and 10% of its employment. These figures are likely to be similar for Edinburgh.

5.5 In light of this, we respectfully suggest that the importance of retailing to the city economy and its potential future contribution to realising the objectives set out within 'Choices' be fully recognised.

6. Summary and Conclusions

6.1 On behalf of Aldi Stores Ltd, we welcome this opportunity to submit representations to Choices for City Plan 2030.

6.2 These representations support the main ambitions set out within 'Choices', in respect to supporting economic growth and the town centre first principle. Aldi have ambitious plans to expand further in the city in future years, bringing their award-winning and highly popular offer to more of the cities communities. As a result it is important that the right policy framework is in place to help deliver this level of investment and creation of new employment.

6.3 The comments and evidence submitted within this representation demonstrate that a number of changes are required to the document, in order to ensure it complies with SPP and support future innovation and change within the city's retail sector and we trust these will be taken on board. We would be happy to meet with City Council officers to fully discuss these points if considered helpful.

Contact Details

Enquiries

Steve Robb
01314696014
steven.robb@avisonyoung.com

Visit us online

avisonyoung.co.uk