



# Planning & Retail Statement

Land at Preston Street, Whitehaven

October 2023



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**Report title:** Planning & Retail Statement

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**Status:** FINAL

**For and on behalf of Avison Young (UK) Limited**



# 1. Introduction

- 1.1 This *Planning and Retail Statement* has been prepared by Avison Young on behalf of ALDI Stores Limited (hereafter referred to as 'ALDI'), to assist Cumberland Council (hereafter referred to as 'the Council') in its consideration of the accompanying detailed application for a new food store at Preston Street, Whitehaven.
- 1.1 Full planning permission is sought for "*Erection of discount food store (Use Class E) with associated access, parking, hard and soft landscaping and associated works*".
- 1.2 This Statement examines the application against Section 38(6) of the *Planning and Compulsory Purchase Act 2004*. It discusses how the development proposals conform to local and national planning policy requirements and how the development proposals accord with the Council's wider strategic regeneration aims for the City.
- 1.3 In accordance with Section 38(6) of the *Planning and Compulsory Purchase Act 2004*, this Planning and Retail Statement assesses the development proposal against relevant policies contained within the adopted Development Plan, key national planning policies and all other relevant material considerations. In addition, this Statement also seeks to demonstrate the wider social, environmental and economic benefits of the scheme.
- 1.2 This Statement should be read in conjunction with the following plans and reports submitted alongside this application:

## Supporting Reports

- Design and Access Statement (Projekt Architects)
- Statement of Community Involvement (Avison Young)
- Preliminary Ecological Appraisal & Biodiversity Net Gain Report (Total Ecology)
- Transport Assessment (Andrew Moseley Associates)
- Interim Travel Plan (Andrew Moseley Associates)
- Noise Impact Assessment (NJD Environmental)
- Air Quality Impact Assessment (NJD Environmental)
- Arboricultural Impact Assessment (All About Trees)
- Tree Protection Plan (All About Trees)
- Phase 1 Geo-Environmental Assessment (3E Consulting Engineers)
- Preliminary Risk Assessment and Ground Investigation Report (DTS Raeburn)
- Geo-environmental Appraisal & Coal Mining Risk Assessment (3E Consulting Engineers)
- Flood Risk Assessment and Drainage Strategy (Hydrock)

## Application Drawings

- 0470-PA-XX-00-DR-A-PM\_40\_50-21-0001-S4-P01 - Location Plan (Projekt Architects)
- 0470-PA-XX-00-DR-A-PM\_40-50-21-0002-S4-P01 - Proposed Site Plan (Projekt Architects)
- 0470-PA-XX-00-DR-A-PM\_40-50-21-0003-S4-P01 - Proposed Floor Plan (Projekt Architects)



- 0470-PA-XX-00-DR-A-PM\_40-50-21-0003-S4-P01 - Proposed Roof Plan (Projekt Architects)
- 0470-PA-XX-00-DR-A-PM\_40-50-21-0005-S4-P01 - Proposed Elevations (Projekt Architects)
- 0470-PA-XX-00-DR-A-PM\_40-50-21-0006-S4-P01 - Proposed Site Plan - Constraints (Projekt Architects)
- 0470-PA-XX-00-DR-A-PM\_40-50-21-0007-S4-P01 - Proposed Site Section (Projekt Architects)
- NSH 012 P101 – Proposed Landscaping Plan (Nicola Hills Studio)

1.4 This Statement is structured as follows;

- **Section 2** – Provides a description of the Site and its surroundings;
- **Section 3** – Sets out the details of the application proposals;
- **Section 4** – Offers an overview of ALDI and outlines some of the key benefits that the business hopes to bring to Hetton-le-Hole;
- **Section 5** – Contains an overview of relevant local and national planning policies;
- **Section 6** – Provides an Open Space Needs Assessment in accordance with Pre-Application Validation requirements;
- **Section 7** – Tests the application proposals against the sequential approach to site selection as defined under Paragraph 86 of the *National Planning Policy Framework* ('the NPPF');
- **Section 8** – Discusses the trading effects of the proposed development, acknowledging that a full retail impact assessment is not required for the scale and form of retail development proposed (based on the local and national town centre policy context);
- **Section 9** – Provides evidence of the proposal's compliance with relevant policies contained within the Local Plan and the NPPF (other than those relating to retail or 'town centre' development); and
- **Section 10** – Evaluates the development proposals against the policy balance set out within Paragraph 11 of the NPPF, providing overall conclusions.



## 2. Site Description

### The Application Site

- 2.1 The Application Site ('the Site') is located on the site of an existing car park and vacant land to the rear of a row of terraced houses to the east of Preston Street.
- 2.2 The Site is located to the south of Whitehaven town centre, is within walking distance of some residential areas of Whitehaven, as well as being located on a bus route. The site is well connected to the surrounding areas, sitting on the main thoroughfare of Preston Street.
- 2.3 The application site is elongated but irregular in shape and runs north-south. The boundaries vary; there are existing rubble stone walls to the area currently occupied by the car park, and some are to the rear of residential properties. The eastern and southern boundaries to the southern portion of the site sit within the disused land and have no current physical delineation.
- 2.4 To the north, beyond a footpath which bounds the site, are other retail units with associated parking, including an existing ALDI store; to the west, across Preston Street, is a large Asda store on an elevated site. There are residential properties directly bounding the western edge of the site in the southern portion. To the south are light industrial units and residential properties, and to the east is open undeveloped and disused land.
- 2.5 Access will be broadly in the same location as the existing car park access point on Preston Street, upgraded to suit the anticipated vehicular movements.



Figure 1: Site Location (Source: Google Maps)



## Site Description and Features

- 2.6 The Site is elongated but irregular in shape and runs north-south extending to circa 1ha. The boundaries vary; there are existing rubble stone walls to the area currently occupied by the car park, and some are to the rear of residential properties. The eastern and southern boundaries to the southern portion of the site sit within the disused land and have no current physical delineation.
- 2.7 The northern part of the Site operates as a car park which is ran by the Council. The southern part of the site is undeveloped and not actively managed; being covered with willow scrub grassland and broadleaved and other woodland.
- 2.8 The existing car park is directly accessible from Preston Street to the west, with an additional existing access to the southern portion of the Site via an offshoot from Bentinck Road to the south (Figure 2). Cycle Route 72 follows the boundary of the Site to its' north and eastern elevations.
- 2.9 Visibility of the Site is considered good given its' relationship fronting onto Preston Street to the west. Surrounding uses comprise of existing retail provision to the immediate north: a Home Bargains store and associated parking, with additional existing retail provision present to the west of the Site to the opposite elevation of Preston Street: an Asda store and associated parking. Residential uses are present to the south-western boundary of the Site, at Maple Grove.

## Site Surroundings

- 2.10 To the north, beyond a footpath which bounds the site, are other retail units with associated parking, including an existing ALDI store; to the west, across Preston Street, is a large Asda store on an elevated site. There are residential properties directly bounding the western edge of the site in the southern portion. To the south are light industrial units and residential properties, and to the east is open undeveloped land.
- 2.11 Further north is Whitehaven town centre, occupied by a range of comparison and convenience retailers, food and drink uses, public houses and leisure uses.

## Site Accessibility

- 2.12 The site is located on land to the east of Preston Street, Whitehaven, approximately 1.3km south of Whitehaven Rail Station. The site is bound to the north by Cycle Route 72, to the south / east by open green land and to the west by Preston Street.
- 2.13 Within the vicinity of the site, Preston Street runs in a north – south alignment between the New Town / Cycle Route 72 priority-controlled roundabout and the B5345 / Cockpit priority-controlled T-junction. The road continues north towards Whitehaven Marina as Swingpump Lane, and south towards St Bees as the B5345. It comprises a two-way single carriageway measuring approximately 6m in width, which is subject to a 30mph speed limit.
- 2.14 Lit footways are available on both sides of the carriageway whilst an uncontrolled pedestrian refuge island is provided some 15m south of the existing pedestrian / vehicular access to Preston Street Carpark, which facilitates safe and convenient pedestrian movements across the carriageway. Double yellow line waiting restrictions are in place along both sides of the carriageway. Dropped kerbs and tactile paving are provided over local minor junctions within the vicinity of the site, including at the access road to the existing ALDI / Iceland as well as ASDA which is located adjacent to the proposed site.



- 2.15 The A595 forms part of the Strategic Road Network (SRN) and is therefore managed by Highways England (HE). The A595 forms the main route through Whitehaven and links Whitehaven to Barrow-in-Furness to the south, Workington in the north and Cockermouth in the north east.
- 2.16 Whilst superseded by the NPPF, the transport policies in the former PPG13 set out specific guidance related to walking: "Walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2 kilometres" (Para 74).
- 2.17 Walking is recognised as the most important mode of travel at a local level in that it offers the greatest potential to replace short car trips, particularly those under two kilometres. As such, consideration has been given to the existing pedestrian facilities in the vicinity of the proposed relocation. The entirety of Whitehaven town centre can be accessed within 2km, as well as Corkickle and Harras Moor. The proposed site is situated within a large residential catchment area and therefore provides a feasible means for both employees and customers to travel on foot.
- 2.18 Footways are present along both sides of Preston Street within the vicinity of the site. The footway network continues into the centre of Whitehaven. Uncontrolled pedestrian crossings are located over local minor junctions in the form of dropped kerbs and tactile paving. A signalised pedestrian crossing comprising dropped kerbs and push button facilities is available at all arms of the Preston Street / Irish Street T-junction. This facilitates safe and convenient movements towards the proposed site from Whitehaven town centre. There are a number of Public Rights of Way (PROW) within the vicinity of the site which connect to the nearby residential estates.
- 2.19 Whilst superseded by the NPPF, the transport policies in the former PPG13 set out specific guidance related to cycling: "Cycling also has potential to substitute for short car trips, particularly those under 5 kilometres, and to form part of a longer journey by public transport" (Para 77).
- 2.20 Cycling has the potential to substitute for short car trips, particularly less than five kilometres. As such, those areas and facilities within a reasonable walking distance can also be considered to be within a reasonable cycling distance. The entirety of Whitehaven is situated within 5km.
- 2.21 The Whitehaven LCWIP Cycle Map shows the cycle infrastructure provision in the local area. In particular, Preston Street forms part of National Cycle Network (NCN) Route 72. It bounds the site to the north and the east forming an off-road signed cycle route between Preston Road and Coach Road. Further afield, the route can be used to access Egremont to the south and Workington to the north.
- 2.22 The closest bus stops are located on Preston Street, within 85-130m / 1-2 minutes walking distance southbound of the proposed site. Both bus stops (northbound and southbound) comprise of a flag, pole, hard copy timetable information and bus layby. The stops are accessible via the existing pedestrian infrastructure. Given that a number of high frequency, high quality bus services are located within convenient walking distance of the site, travel by bus is likely to be an attractive option for staff and customers travelling to / from the site.
- 2.23 The nearest rail station to the site is Corkickle Rail Station which is located approximately 700m east of the proposed site. It can be accessed in 8 minutes on foot or 2 minutes by bike via Cycle Route 72. Corkickle Rail Station provides frequent rail services to Barrow-in-Furness, Carlisle and Lancaster. Whitehaven can also be accessed from the station using northbound trains to Carlisle. Step-free access to the platform is provided. No bicycle storage is available.
- 2.24 The site is considered to be located in a sustainable location for access by non-car modes in line with local and national planning policy for town centres.



- 2.25 There is a large residential catchment within a short walk or cycle from the site, meaning future staff and customers have the opportunity to travel sustainably, and public transport is available for those members of staff travelling over longer distances.
- 2.26 In order to facilitate and support sustainable travel options, measures to reduce the impact of car travel and manage car use are presented in the accompanying Interim Travel Plan.

## Planning History

- 2.27 The Copeland Borough Council Planning Portal shows that the Site has been subject to the following applications of note in recent years:
- *4/21/2474/0F1 – Renewal of permission for 89 space temporary carpark for a period of four years – Applicant: Morbaine Limited – Approved 10 February 2022;*
    - The application included a Supporting Statement detailing that within the four years the car park has been operating, there have been no resulting road impacts or accidents. Overall, the Officer's Report concluded that traffic flows to and from the site would not have a material effect on the existing transport network;
    - Concerns were noted by the LLFA regarding hard surfaced disabled bays in the eastern part of the site collecting water and subsequently sometimes being inaccessible. It was agreed that a filter drain would be installed in this area of the site to mitigate this risk; and
    - It was concluded in the Officer's Report that the temporary nature of the permission would ensure it did not preclude the site's future development for employment purposes as part of the Councils growth agenda – indicating that the Council were keen to retain the site for employment use.
  - *4/19/2120/0F1 – Proposed Car Park – Approved 26 June 2019;*
  - *4/17/2248/0F1 – Temporary car park (4 years) for approximately 89 spaces – Approved 17 January 2018;*
  - *4/15/2268/0F1 – Erection of boundary fencing onsite to provide security from trespassing – Approved 17 August 2015;*
  - *4/14/2124/0F1 – Extra care and dementia facility comprising 56 apartments and 4 bungalows – Approved 21 May 2014;*
  - *4/06/2686/0 – Superstore with petrol filling station, parking, servicing and associated facilities – Withdrawn February 2008; and*
  - *4/04/2480/0 – Outline application for Class A1 foodstore, petrol filling station, car parking, servicing, and associated facilities – Approved 18 February 2008.*



### 3. The Proposed Development

- 3.1 This section provides an overview of the proposed development's business format, layout, design, access and servicing arrangements.
- 3.2 This Planning Application seeks 'full' planning permission for the erection of a Use Class E foodstore with new vehicular access and egress to Preston Street, new internal vehicular access roads, car parking, cycle parking, servicing area, and hard and soft landscaping.

#### Pre-Application Engagement

- 3.3 The redevelopment proposals have been the subject of pre-application discussions with Cumberland Council (formerly Copeland Borough Council) as the local planning authority. These discussions have informed the applicants' approach to the planning application, including the design of the scheme and the submission materials that have been prepared to accompany it.
- 3.4 Overall, the application proposals represent the output of a collaborative process undertaken in-line with best practice guidance through collaborative pre-application discussions undertaken across the past year. A suggested validation list of supporting evidence documents was provided by the Council, all of which are included with the application package.

#### Specifics of the Development Proposals

- 3.5 The precise nature of the development proposals is set out below. This planning application seeks 'detailed' planning permission for the following:
- Erection of a Use Class E foodstore with a Gross External Area (GEA) of 2,127 sqm, Gross Internal Area (GIA) of 1,916 sqm, and a net sales area of 1,356 sqm;
  - Provision of 100 car parking spaces including 5 accessible spaces and 9 parent and child spaces. 4 motorcycle bays are also provided;
  - Of the proposed 100 parking spaces, 4 will be equipped with Electric Vehicle Charging Points ('EVCP');
  - 8 short-stay bicycle parking spaces (5 Sheffield cycle hoops) for customers, and long stay bicycle parking spaces (located within the store's warehouse) for staff;
  - Soft and hard landscaping works, including new landscaping and extensive planting to improve the Site's aesthetic appearance;
  - Servicing provision (a dock-levelling system) at the southern elevation of the proposed foodstore; and
  - Provision of an internal vehicular route through the Site from the upgraded access point from Preston Street.

#### Relocation of Existing Aldi Store

- 3.6 The wider context to this application is that the proposals for this site comprise to the closure and relocation of an existing Aldi store circa 200m north along Preston Street. The current Aldi store has a dedicated customer base in Whitehaven, but the applicant recognises that its current store has an outdated layout and appearance, which affects the overall customer experience.



- 3.7 Aldi has explored a number of options to deliver an improved customer experience at the existing Preston Street store for many years. However, there are a number of constraints on the existing site limiting the opportunities to extend. The only viable route to offering an improved, larger Aldi food store in Whitehaven is by relocating to a new site nearby.
- 3.8 The application site has become available, which would allow Aldi to develop a larger store that can offer a superior Aldi shopping experience in Whitehaven, meeting the standards that the company's customers have come to expect nationally.
- 3.9 The development proposals will see the brownfield site at Preston Street developed into an attractive, modern food store, with convenient access options and high-quality landscaping.
- 3.10 Aldi has a strong record of ensuring any site they have vacated is re-occupied by other footfall generating uses, to ensure the vitality and viability of the area is preserved. It is expected that marketing of the unit would commence immediately after planning permission is granted for the new store.
- 3.11 Staff from the existing store would transfer over to the new store and further full-time equivalent jobs will be created, with additional employment opportunities via construction and the supply chain. The creation of new jobs and retention of existing jobs would support the local economy, keeping spend within Whitehaven - paying an industry-leading salary of £11.40 per hour for shop assistants.
- 3.12 In addition to employment opportunities, the proposals represent a £5 million investment in Whitehaven and will regenerate a long-term vacant brownfield site close to the town centre, helping to repair the urban fabric. Cumberland Council will receive approximately £100,000 per year in business rates.
- 3.13 Aldi is committed to working with local suppliers, both during construction and throughout the operation of the food store.

## Overview of ALDI Discount Foodstore Format & Business Model

- 3.14 The following section provides a brief overview of the scale and form of food retail development proposed. In terms of format, the ALDI foodstore will have a Gross Internal Area ('GIA') of 1,916 sqm and a net trading area of 1,315sqm. The trading floorspace within every ALDI store is consistent at around 1,200sqm to 1,400sqm. This is to enable the range of identical products sold within each ALDI store to be arranged and displayed on a consistent basis. The gross floor area of new ALDI stores (i.e. the trading floorspace plus back of house area) varies slightly within a range of approximately 1,700sqm to 2,000sqm. Again, the aim is to ensure that the stores are built to a consistent specification in order to facilitate efficient delivery and distribution of products to each ALDI store in the portfolio.
- 3.15 With regards the nature of the food retail development proposed, it is significant that ALDI operate as a 'deep-discount' retailer. This essentially means the number of core food product lines stocked within each ALDI store is identical and deliberately restricted to around 2,000 lines, accompanied by approximately 500 specials which change on a regular basis. This sits in stark contrast to the 20,000+ product lines available in a superstore operated by one of the UK's 'mainstream' convenience retailers and is the reason why all ALDI foodstores are of a uniform size and format.
- 3.16 The core retail offer within an ALDI store (approximately 80% of net sales area) seeks to replicate the most regularly purchased items within a family's weekly or 'bulk' food shopping trip. The vast majority of products stocked are ALDI branded and through economies-of-scale these goods can be sold at heavily discounted prices without impacting upon quality. Stock is generally presented on pallets or



shelves within display ready packing cases to aid efficiency and reduce unnecessary overheads. Savings which can then be passed directly on to the consumer.

- 3.17 ALDI's focus on key products which typically constitute 'bulk' food shopping trips meaning they do not sell certain 'ancillary' lines normally found in mainstream supermarkets, including tobacco. In addition, there is no staffed butchery, fishmonger, delicatessen or hot food-counter, and ALDI's foodstore format does not accommodate customer restaurants or in-store franchises such as a Post Office, dispensing pharmacy, dry-cleaning, opticians, betting or photo processing facilities. These factors are important when considering the trading effects of an ALDI foodstore; as in ALDI's case the potential for cross-over with independent high-street retailers is far less than when considered alongside 'mainstream' food retailers stocking a far wider spectrum of goods. The retail impact of the new store is examined in greater detail in the later sections of this Statement.
- 3.18 Notwithstanding the above, the ALDI foodstore, as with all modern supermarkets, will also stock a very limited range of non-food goods (approximately 20% of net sales area). The range of non-food goods in an ALDI store is purely ancillary to the food offer in floorspace terms, and it is also significant that the products stocked mirror seasonal demand such that there is a constant variety in terms of range and choice, with no particular type of comparison good predominating. In this fashion, the potential for an ALDI foodstore to compete with high-street retailers is extremely limited. This point is also considered in greater detail within the retail impact sections of this Statement.

## Use and Amount

- 3.19 The proposed development for the site at Preston Street consists of a single storey ALDI store blade-roof building with vehicular, pedestrian and cycle access, car parking and landscaping on the northern and western section of the site. The application is a full planning application.
- 3.20 The application site is currently a car park; the rest vacant/disused. It is partially historically developed land, and the proposed development would create active use and new jobs. The ALDI store would broaden the range of food retail facilities and improve choice for nearby residents.
- 3.21 The proposed opening hours of the store are 0800 to 2200 hours Monday to Saturday and for six consecutive hours between 1000 and 1800 on Sundays. A Noise Assessment will be undertaken which considers the existing noise environment and then assesses the noise environment with the foodstore, on the existing residents and adjacent neighbours. The assessment will seek to demonstrate that the trading hours are compatible with the adjacent land uses.
- 3.22 A Transport Assessment has been carried out to ensure vehicles accessing the site and manoeuvring within the site can be accommodated safely with no detrimental effects on the existing road network. The upgrading of the access from Preston Street will ensure safety for all users. The Transport Assessment demonstrates the proposed uses are acceptable.
- 3.23 The overall application site area is 1ha/2.49 acres. Being a neighbourhood shopping facility, the proposed foodstore is 2,127m<sup>2</sup> gross external area (1,916m<sup>2</sup> gross internal area) with a net sales area of 1,315m<sup>2</sup> sqm. The areas within the store not accessible to the public include the warehouse and staff and office facilities. A total of 100 dedicated ALDI car parking spaces are provided.
- 3.24 There are 4 other parking bays indicated on the plan proposed for use by ALDI staff (not included in the parking total).



## Access and Layout

- 3.25 The proposed site layout is informed by the site context and design principles, together with feedback received from the local planning authority through the pre-application enquiry process and comments received during the public consultation process. Full details of the public consultation are provided in the Statement of Community Involvement submitted with the planning application.
- 3.26 The proposed site layout has a main access from the west for all vehicles and pedestrians, with crossing points to allow safe access to the store, which sits to the south and west of the car park. The parking arrangement is simple and compact allowing space for soft landscaping to tie the site into its surroundings.
- 3.27 The building is set back from the main Preston Street frontage, and partially behind the residential terrace on the southwestern edge of the site, but still has good visibility from the main road across the parking area.
- 3.28 The service area is located to the southern side of the store with access for the goods vehicles through the car parking area and along a dedicated service road to the east of foodstore. Access to the service area has been designed to accommodate the turning manoeuvres of 16.5 metre articulated goods vehicles, these being the largest delivery vehicles which will serve the store. The vehicles will drive into the site in forward gear and reverse into the service ramp area and then exit the site in forward gear. The Transport Assessment gives full details of the servicing regime and demonstrates, using autotrack, that the manoeuvre can be undertaken safely.
- 3.29 The foodstore would be positioned in a broadly north-south orientation in the southern central portion of the site.
- 3.30 With the customer entrance and shop front to the north western corner of the building, the car parking area is to the north and west. For customers arriving by car, the store entrance is visible on entering the site, and the car park layout means it is easy to navigate towards it. The store entrance will be visible for pedestrians approaching from Preston Street in either direction.
- 3.31 A total of 100 car parking spaces are provided including 5 accessible bays, 9 parent & child bays and 4 active bays for electric vehicles. There are 4 bays provided for motorcycles within the main car park, and cycle stands for 8 bicycles to the northern elevation, in front of the glazed shopfront, where there will be natural surveillance.
- 3.32 ALDI's standard refrigeration plant is provided at ground level to the side of the store at the south west corner. The results of the Noise Assessment have resulted in some mitigation being required which is reflected in the acoustic fences shown on the site plan, so as ensure that the location of the service area and the refrigeration plant cause no adverse impact to residential amenity. An area has also been provided for external bin storage within the loading bay.
- 3.33 The overall site layout ensures the opportunities for crime and disorder are minimised with the site being open to achieve good natural surveillance. Low level shrubs ensure there are no hiding places within the site. The proposed site layout is shown on the following page.

## Scale and Appearance

- 3.34 The gross external floor area of the proposed ALDI store is 2,127m<sup>2</sup> which sits within a site of 10,080m<sup>2</sup>. The maximum height of the proposed store is to the front elevation being 6.25m to the blade roof. The height of the rear elevation is 5.0m from the ground.



- 3.35 Within the immediate vicinity of the site, there is a mix of architectural styles and building materials. The residential properties close by are two storeys, terraced, tiled pitched roofed properties of rendered/roughcast, with some painted a variety of colours.
- 3.36 The surrounding retail/commercial units are a mix of brick, metal cladding and concrete tiled/flat roofs.
- 3.37 In terms of scale, the proposed single storey, blade roof foodstore, reflects the scale of the buildings surrounding the site. It is also set down within the site at a lower level to the existing buildings due to the complicated nature of the site topography.
- 3.38 The overall design of the store is a modern, contemporary style with a simple palette of materials combining silver and grey cladding, aluminium windows, steel doors and glazing. There is a canopy wrapping above the shop front which runs along the west elevation to maximise natural light in the store. The west and north elevations show the configuration of the loading bay that allows HGVs to dock at floor level with the building.
- 3.39 There will be no daily activity to the rear of the store. There are two escape doors which will be used to exit the store in emergencies only. There are two high level windows to the western side of the elevations to allow light into the staff rooms. There are no other windows and therefore no overlooking issues.

## Proposed Access and Servicing Arrangements

- 3.40 Customer vehicular, walking and cycling access is provided at the north west extent of the site via a proposed new simple priority-controlled T-junction with Preston Street.
- 3.41 For pedestrian access, dropped kerb and tactile paving facilities will be provided to facilitate pedestrians crossing the site access, tying into existing provision along Preston Street. The pedestrian footway bounding both access radii will not be continued into the site, ensuring no conflicting pedestrian movements with vehicles accessing / egressing the car parking area.
- 3.42 Visibility splays from the site access are in accordance with the Manual for Streets (MfS) standards for a 30mph speed limit at 2.4m x 43m.
- 3.43 The proposed development would be served by a dedicated servicing area located to the south east of the store. Deliveries will be required to manoeuvre through the car park; however, these will be infrequent (up to 4 per day) and can be managed to avoid peak shopping times as is the case with the majority of ALDI's. White lining will be provided to safely demarcate access to the delivery area.
- 3.44 The delivery area has been assessed to ensure suitability of servicing and accommodation of a UK maximum standard (16.5m) articulated HGV. The accompanying Transport Statement shows the swept path of an articulated vehicle accessing and egressing the service area for the proposed ALDI development. The drawing demonstrates that the vehicle can satisfactorily access and egress the site in forward gear. Deliveries would continue to be managed to ensure minimal conflicts with other site users.

## Hours of Operation

- 3.45 ALDI's foodstores are open seven days per week (including most Bank Holidays), however the company does not promote 24-hour trading as is the case with many of the UK's other 'mainstream'



food retailers. Accordingly, ALDI would accept a planning condition setting out minimum opening hours of:

- 08:00 hours to 23:00 hours – Mondays to Saturdays; and
- 09:00 hours to 18:00 hours – Sundays.

*(Note – Sunday trading laws mean that the ALDI store can only open for up to six hours on a Sunday.*

*This will typically be between 10:00 hours to 16:00 hours)*

## Summary

- 3.46 In summary, the proposed foodstore will represent a high-quality development promoting a contemporary design using an appropriate materials palette which also respects the Site's context, to the benefit of the local and wider environment.
- 3.47 Full details regarding the design of the foodstore building and proposed materials are contained in the plans and elevations submitted with this application, as detailed in the accompanying Design and Access Statement, which should be referred to for further design related information.



## 4. ALDI Stores Limited

### About the Occupier

- 4.1 ALDI Stores Limited are the joint applicant and occupier for this scheme, comprising 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 960 stores across England, Scotland and Wales.
- 4.2 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.
- 4.3 ALDI regularly receives industry awards recognising the quality of its products and customer experience. ALDI was named Cheapest Supermarket of the Year at the Which? Awards 2022; voted the nation's Favourite Supermarket and Favourite Wine Retailer at the 2019 Good Housekeeping Food Awards; and Best Grocer at the *Retail Week Awards* 2019.
- 4.4 For recognition of investment in people, ALDI was crowned Employer of the Year at *The Grocer Gold Awards* in 2022 and 2017, whilst they were named Grocer of the Year at *The Grocer Gold Awards* 2018.

### How ALDI is Different

- 4.5 ALDI has a 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.
- 4.6 The key aspects of their 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 2,000 products;
  - Own label high quality products;
  - Formidable buying power;
  - High volume and turnover per product; and
  - Heavily discounted prices providing an average 20-30% saving across the entire range, compared with similar quality products.
- 4.7 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 sales area are uniform 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.

- 4.8 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.
- 4.9 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 (circa 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.
- 4.10 The deliberate intention is to restrict the range of core goods to approximately 2,000 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.
- 4.11 This is unlike larger supermarkets which stock in the region of 20,000 to 40,000 product lines, and more modest sized operators, with floor areas of 1,000 to 1,500sqm selling between 2,500 and 4,000 products. ALDI do not sell cigarettes and tobacco products and their trading philosophy does not include a staffed butchery, fishmonger, 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 a Post Office, dispensing pharmacy, dry-cleaning, opticians, betting office, travel agent, mobile phone shop or photo processing.
- 4.12 Whilst the core range of products is limited, ALDI offers a significant choice of locally sourced produce. Where possible ALDI's fresh meat and produce is UK sourced. 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.
- 4.13 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.
- 4.14 How ALDI differs is demonstrated clearly by their 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

- 4.15 ALDI supports sustainable development and has a strong track record in delivering schemes which contribute to the needs of the local economy.



## Catchment

- 4.16 As ALDI stores are of modest scale and fulfil a local shopping role, it means more than one store can be accommodated in a Local Authority area. In high population density areas such as towns and cities several ALDI foodstores can be sustained, reflective of the fact that each is modest in size. They work together as a network to serve the community, as opposed to mainstream foodstores whereby a single 'superstore' serves a much wider geographic area. The catchment for a new ALDI foodstore is therefore typically local in nature and often a proportion of the shoppers attracted are existing ALDI customers who have been travelling to their nearest store (possibly several miles away), but with a new store opening close by, this can reduce their need to travel.
- 4.17 ALDI's local presence can assist in clawing back expenditure being spent elsewhere by providing a foodstore 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

- 4.18 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.
- 4.19 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.
- 4.20 ALDI recognises that design is a key consideration in the determination of applications for its stores. External store design has evolved over time with the design for each store is consistent across ALDI's portfolio, promoting a modern smart building with clean lines and glazed frontages which meet customer expectations.

## Accessibility

- 4.21 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.
- 4.22 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. A full explanation of this principle is set out in the accompanying Transport Assessment.

## Residential Amenity

- 4.23 The opening hours of ALDI stores are more limited than some other larger supermarkets which operate 24-hour. Currently ALDI stores operate 0800 to 2200 Monday to Saturday and for six hours



between 1000 to 1800 on Sundays, to comply with Sunday Trading Laws. As ALDI stores are located in or in close proximity to existing residential areas, ALDI is committed to being a responsible neighbour and seeks to ensure the amenity of residents is maintained.

## Job Creation and Training

- 4.24 New ALDI stores generally employ over 40 staff. 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.
- 4.25 ALDI ensure that its foodstores have a positive impact on the local communities that they are located within as recruitment is focused locally. Job vacancies are advertised in nearby stores and in the local press alongside ALDI's website. This approach usually results in the majority of staff being recruited from the local area. In addition, it is not unusual for the retailer to work with the local Job Centre Plus when recruiting for a new foodstore so that residents of the local area are specifically targeted.
- 4.26 It should be noted that part-time staff are placed on a 15-, 20- or 25-hour contracts at above industry average pay. As such, many part-time positions at ALDI would actually be viewed as full-time positions in other industries, including the retail sector.
- 4.27 ALDI has two of the most successful apprenticeship schemes and graduate programmes in the UK – as demonstrated by the awards referenced earlier within this Section. 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.
- 4.28 ALDI's on-going graduate scheme secures an annual intake for the Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK-wide programme.
- 4.29 The construction of a new store requires the services of local building trade contractors which provides employment opportunities during the build out period. Usually, a range of skills such as ground works, steel, brick and block work and shop fitting are sourced locally, as well as cleaners and labourers.
- 4.30 Finally, during the construction of the foodstore, by working with their chosen contractor ALDI are often able to identify individuals that are seeking work placements and may be able to accommodate these during the project. ALDI typically identify candidates that will benefit the most from the opportunity, particularly those that are currently undertaking some form of construction related education and training, and those that are looking to re-enter the industry after a period of absence. ALDI works with its appointed supply chain to support work placements.

## ALDI Foodstore Sustainability Features

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



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	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.



Main themes	Sub Theme	Proposed Measures to be Incorporated into the Development
<b>Site Management</b>	Commissioning and Handover	A building user guide and building education would be provided as part of the development's handover.

*Table 4.1 ALDI Store Sustainability Features (Source: ALDI & Project Team)*

## Heat Recovery System (Re-Usable Energy)

- 4.32 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.
- 4.33 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.
- 4.34 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.



## 5. Planning Policy Context

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that decisions should be made in accordance with the development plan unless material considerations indicate otherwise. The Development Plan for the purpose of this planning application comprises the Copeland Local Plan 2013-28 Core Strategy and Development Management Policies (adopted 2015) ('the Core Strategy') and remaining policies 'saved' from the preceding Copeland Local Plan 2001-2016 (adopted 2006) ('the 2006 Plan').
- 5.2 Copeland Borough Council are in the process of producing a new Local Plan which once adopted will replace the Core Strategy and saved policies. The emerging plan was submitted to the Secretary of State for Examination mid-2022 and hearings sessions held Q1 2023. In accordance with the requirements of NPPF Paragraph 48, given the advanced stage of its preparation, the draft policies of the emerging Copeland Local Plan 2021-2038 can be attributed significant weight in the determination of planning applications.
- 5.3 Whitehaven Town Centre and Harbourside SPD (2012) is a supplementary planning document ('SPD') of relevance to this application (adopted 2012).
- 5.4 Alongside the Local Plan and Council SPDs, there are other local and national planning policy documents that represent **material considerations** in the determination of this planning application, and these are also summarised (where relevant) in this section of our Planning Statement. These policy documents include:
- **National Planning Policy Framework (July 2021)** - The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. The policies contained within the NPPF are important material considerations which should be taken into account when dealing with individual planning applications; and

### The Development Plan

#### Copeland Local Plan 2013-28 Core Strategy and Development Management Policies (adopted 2015)

- 5.5 An extract of the Policies Map showing the Site and its surroundings and relevant designations within the Plan is provided at Figure 5.1. The Site itself is delineated as an Employment Opportunity Site under Saved Policy EMP3. The Site is part of the wider designation of WEOS5 'Land at Ginns' which is not formally allocated but is identified as a site for potential future development to contribute to regeneration strategies in the Borough. Detailed implications and locational issues associated with these sites will be the subject of future planning policy documents as soon as practicably possible.
- 5.6 As noted above, all saved policies will be superseded and replaced upon adoption of the emerging *Copeland Local Plan 2021-2038*.



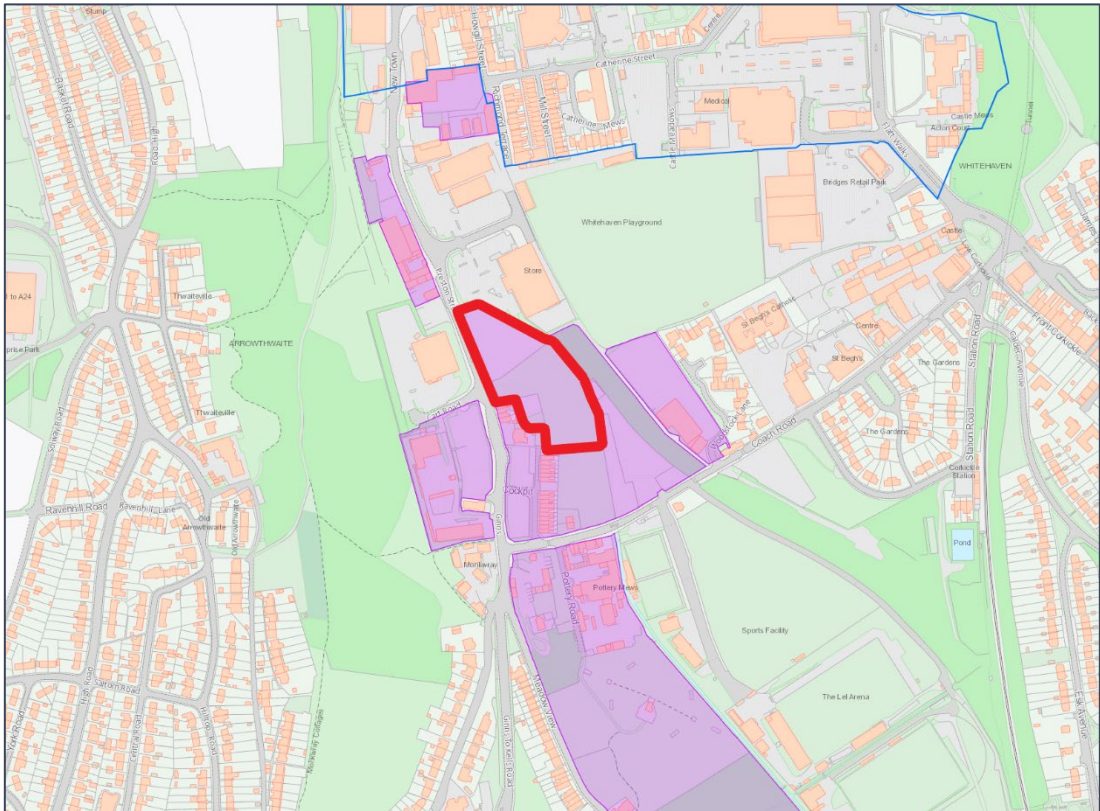


Figure 2: Copeland Local Plan 2013-28 Policies Map (Source: Cumberland Council)

5.7 *Policy ST1: Strategic Development Principles* sets out the fundamental principles that will guide development management in the Borough. Principles include (inter alia):

- focus development on sites at least risk from flooding,
- reuse existing buildings and previously developed land wherever possible,
- support the reclamation and redevelopment or restoration of the Borough's vacant or derelict sites, whilst taking account of landscape, biodiversity and historic environment objectives,
- prioritise development in the main towns where there is previously developed land and infrastructure capacity.
- accommodate traffic and access arrangements in ways that make it safe and convenient for pedestrians and cyclists to move around; and
- ensure new development addresses land contamination with appropriate remediation measures.

5.8 *Policy ST2: Spatial Development Strategy* seeks to direct development to the most sustainable locations – the main settlements. Employment development should respect this hierarchy. The Policy Identifies Whitehaven as the Principal Town in the Plan area.

5.9 *Policy ST3: Strategic Development Priorities* identifies several priority locations for development in pursuit of economic regeneration and growth to fulfil strategic objectives for Copeland and West Cumbria, including regeneration sites in south and town centre renewal sites.

5.10 *Policy ER7: Principal Town Centre, Key Service Centres, Local Centres and Other Service Areas: Roles and Functions* addresses the retail hierarchy and the appropriate type and scale of retail development required for each centre so as not to adversely impact on the vitality or viability of other nearby



centres. Reference is made to the need to reinforce the role of Whitehaven as the Principal Town through the promotion of a flexible, mixed-use approach, and supporting Whitehaven's role as a tourist and visitor destination.

- 5.11 *Policy ER8: Whitehaven Town Centre* expands on the aims for Whitehaven, including enhancing the retail function; diversifying the retail 'offer'; improving the tourism 'offer' and enhancing key gateway sites. Policy ER8 also identifies the proposed extension to the Town Centre boundary to incorporate Bridge Retail Park south of Morrisons.
- 5.12 *Policy ENV1: Flood Risk and Risk Management* seeks to ensure that development in the Borough is not prejudiced by flood risk through:
- A. Permitting new build development only on sites located outside areas at risk of flooding, with the exception of some key sites in Whitehaven;
  - B. Ensuring that developments on important regeneration sites in Whitehaven Town Centre and Harbourside and Pow Beck Valley are designed to address the existing levels of flood risk without increasing flood risk elsewhere;
  - C. Ensuring that new development does not contribute to increased surface water run-off through measures such as Sustainable Drainage Systems, where these are practical. Where they are not this should be achieved by improvements to drainage capacity;
  - D. Supporting measures to address the constraints of existing drainage infrastructure capacity and avoiding development in areas where the existing drainage infrastructure is inadequate;
  - E. Support for new flood defence measures to protect against both tidal and fluvial flooding in the Borough, including appropriate land management as part of a catchment wide approach;
- 5.13 Individual development proposals will be assessed with regard to Development and Flood Risk under Policy DM24
- 5.14 *Policy ENV3: Biodiversity and Geodiversity* supports the implementation of the UK and Cumbria Biodiversity Action Plan within the plan area by seeking to:
- A. Improve the condition of internationally, nationally and locally designated sites;
  - B. Ensure that development incorporates measures to protect and enhance any biodiversity interest;
  - C. Enhance, extend and restore priority habitats and look for opportunities to create new habitat;
  - D. Protect and strengthen populations of priority or other protected species;
  - E. Boost the biodiversity value of existing wildlife corridors and create new corridors, and stepping stones that connect them, to develop a functional Ecological Network;
  - F. Restrict access and usage where appropriate and necessary in order to conserve an area's biodiversity value;
- 5.15 Policy DM25 supports this policy, setting out the detailed approach towards managing development proposals that are likely to have an effect on nature conservation sites, habitats and protected species.
- 5.16 The following 'saved' policies of the Copeland Local Plan 2001-2016 have been identified as relevant:
- 5.17 *Policy EMP3: Employment Opportunity Sites* identifies areas of land at Whitehaven, Cleator Moor and Egremont as Employment Opportunity Sites. These areas are being investigated as to their future development potential and contribution they can make to the regeneration strategies in the Borough. Detailed implications and locational issues associated with these sites will be the subject of future planning policy documents as soon as practicably possible.



- 5.18 *Policy DM10: Achieving Quality of Place* sets out the Council's expectation for a high standard of design and the fostering of 'quality places', through a number of measures, including responding positively to the character of a site and wider setting; incorporating existing features of interest including landscape, topography, local vernacular styles and building materials; and creating and maintaining reasonable standards of general amenity.
- 5.19 *Policy DM11: Sustainable Development Standards* sets out the Council's ambition that development proposals reach high standards of sustainability, through requirements such as: high energy efficiency standards in relation to the Code for Sustainable Homes and BREEAM; buildings to maximise solar gain; construction materials to be sourced, where possible, from local and sustainable sources of production; and surface water is managed appropriately and inclusion of SuDS where possible.
- 5.20 *Policy DM22: Accessible Developments* requires development proposals to be accessible to all users prioritising pedestrian and cycle needs, encouraging public transport and manages traffic access and speeds without resorting to engineering measures and incorporates appropriate parking standards.
- 5.21 *Policy DM24: Development Proposals and Flood Risk* requires a Flood Risk Assessment (FRA) to be submitted as part of the planning application where a proposed development is likely to be at risk from flooding or increases risk of flooding elsewhere.
- 5.22 *Policy DM26: Landscaping* sets out that all development proposals will be assessed in terms of their potential impact on the landscape.
- 5.23 *Policy DM28: Protection of Trees* requires an arboricultural assessment as to whether any trees are worthy of retention and protection and stipulates that any trees removed are replaced at a minimum ratio of 2:1.

### Emerging Copeland Local Plan 2021-2038

- 5.24 Copeland Borough Council are in the process of producing a new Local Plan which once adopted will replace the Core Strategy and saved policies.
- 5.25 The emerging plan was submitted to the Secretary of State for Examination mid-2022 and hearings sessions held Q1 2023. In accordance with the requirements of NPPF Paragraph 48, given the advanced stage of its preparation, the draft policies of the emerging Copeland Local Plan 2021-2038 can be attributed significant weight in the determination of planning applications.
- 5.26 The following key Publication Draft policies have been highlighted as being of relevance to the proposals.
- 5.27 *Strategic Policy DS3PU: Settlement Hierarchy* sets out the settlement hierarchy. Development must be proportionate in terms of nature and scale to the role and function of the settlement, unless it has been identified within the Plan to meet the strategic growth needs of the borough. Whitehaven is listed as the Principal Town, defined as the largest settlement in terms of population by a considerable margin with the broadest range of day-to-day services including the West Cumberland Hospital, a number of secondary schools and an extensive choice of convenience and comparison goods stores and employment opportunities. Well connected to neighbouring boroughs by public transport. The town will continue to be the primary focus for new development in the borough (town centre, retail, employment and housing), with large scale housing extensions, windfalls and infill development.



- 5.28 *Policy DS6PU: Design and Development Standards* sets out the Council's expectation for new development to meet high-quality standards of design, including measures such as: creation and enhancement of locally distinctive places sympathetic to surrounding context; use good quality building materials that reflects local character and vernacular, sourced locally where possible; support good health and well-being by incorporating high quality, inclusive and useful open spaces and providing high levels of residential amenity; create layouts that encourage walking and cycling; provision of safe and accessible pedestrian routes; create opportunities that encourage social interaction; be of flexible and adaptable design; maximise solar gain; and address land contamination and land stability.
- 5.29 *Policy DS7PU: Hard and Soft Landscaping* sets out the requirement for appropriate high-quality landscaping scheme with proposals for development, including a management plan, details of the position, species and number of new trees and any hard landscaping proposed including materials, levels etc.
- 5.30 *Policy DS9PU: Sustainable Drainage* seeks that new development incorporates sustainable drainage systems where appropriate.
- 5.31 *Strategic Policy N3PU: Biodiversity Net Gain* sets out the Council's requirement for all development to provide a minimum of 10% biodiversity net gain over and above existing site levels.
- 5.32 *Policy DS5PU 'Planning Obligations'* notes the Council will secure infrastructure enhancements through planning obligations where reasonable, necessary and directly related to the development including:
- Transport and Highways improvements (including public transport, sustainable transport solutions, footpaths and cycleways);
  - Car parking and Cycle parking/storage;
  - Electric vehicle charging points;
  - Travel Plans;
  - Drainage infrastructure, flood risk mitigation and surface water management;
  - Digital connectivity;
  - Low carbon energy and renewable energy infrastructure;
  - Affordable housing;
  - Education and health facilities;
  - Community facilities including social care and sports facilities;
  - Green infrastructure including public open space, play areas, and allotments;
  - Environmental improvements such as landscaping, tree planting, public art, biodiversity net gain, measures to conserve and enhance heritage assets; and
  - Compensatory habitat.
- 5.33 *Strategic Policy DS8PU: Reducing Flood Risk* seeks to ensure that development in the borough is not prejudiced by flood risk through:
- a) Directing development to allocated sites outside areas of flood risk where possible;
  - b) Only permitting windfall development in areas of flood risk where applicants have carried out the flood risk sequential and exception tests to the satisfaction of the Council and appropriate mitigation is provided;



- c) Ensuring that developments on Opportunity Sites within Whitehaven are designed to address the existing levels of flood risk without increasing flood risk elsewhere;
- d) Supporting measures to address the constraints of existing drainage infrastructure capacity;
- e) Avoiding development in areas where the existing drainage infrastructure is inadequate; unless appropriate mitigation is provided;
- f) Supporting new flood defence measures to protect against both tidal and fluvial flooding in the borough, including appropriate land management as part of a catchment wide approach;
- g) Ensuring that any development that incorporates flood mitigation strategies does not have adverse effects on water quality;
- h) Requiring the provision of sustainable drainage systems where appropriate; and
- i) Working with partners to manage the risks associated with coastal erosion and flooding and ensure that all new development is located outside areas identified as being at risk either now or in future revisions of the Shoreline Management Plan.

5.34 *Policy DS11PU: Protecting Air Quality* states development proposals will only be granted planning permission where they will not give rise to unacceptable levels of air pollution. The Council will continue to monitor air quality in the borough and will introduce Air Quality Management Areas as necessary. Applications for new or extended farming developments must include details of measures to reduce ammonia emissions where appropriate.

5.35 *Strategic Policy E6PU: Opportunity Sites* sets out Council support for the development and/or redevelopment of Opportunity Sites in and on the edge of the towns of Whitehaven, Cleator Moor, Egremont and Millom as the focus to help regenerate these towns. Site WEOS5 'Land at Ginns' identified in Saved Policy EMP3 is carried forward and given reference OWH05 'Land at Ginns'. This is recognised as a 2.98ha site, suitable for 'all town centre uses; also suitable for employment uses B, C, E, F and Sui Generis (town centre appropriate) uses'.

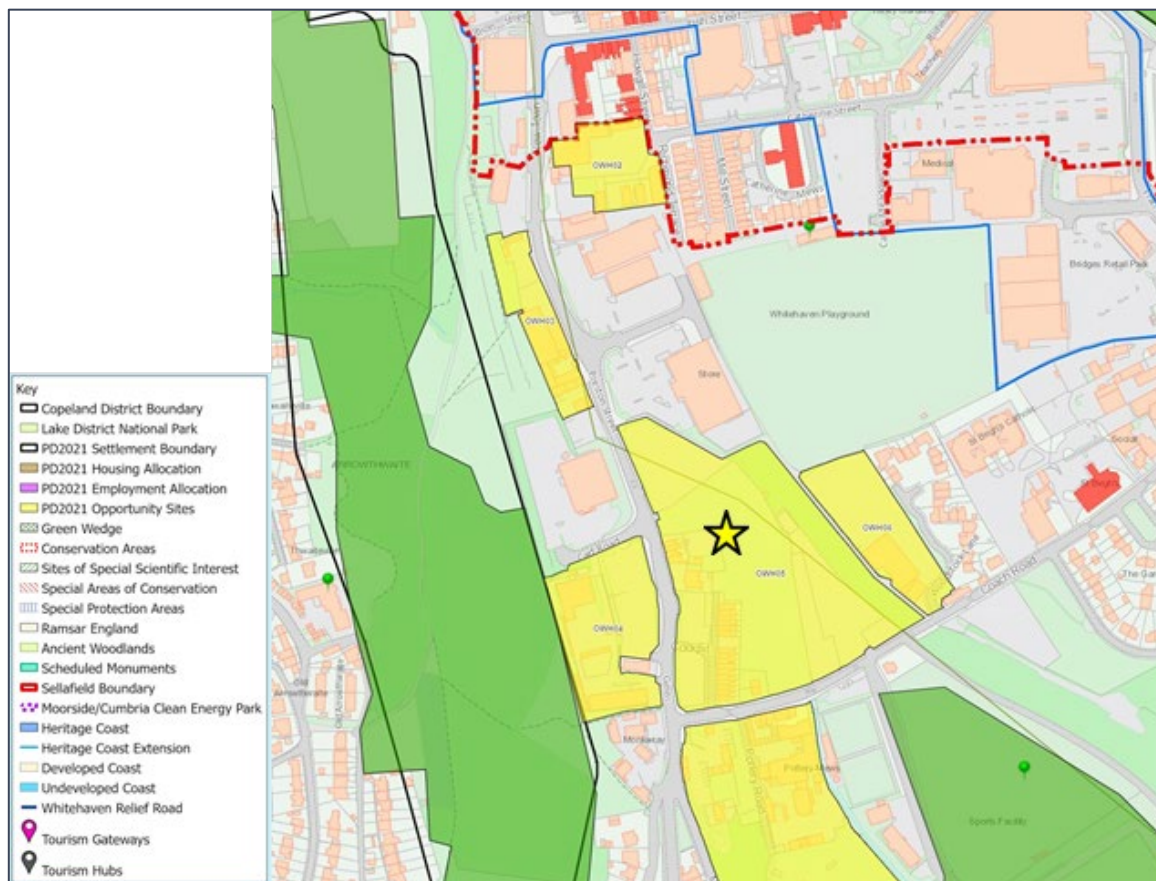


Figure 3: Emerging Local Plan Policies Map Extract with Key (Source: Cumberland Council)



- 5.36 *Strategic Policy R1PU: Vitality and Viability of Town Centres and villages within the Hierarchy* seeks to enhance the vitality and viability of town centres and villages identified in the settlement hierarchy by working with partners and applicants to:
- Support a network of healthy, vibrant and resilient town centres, comprised of a diverse range of retail, residential, leisure and other main town centre uses, that can effectively respond to change;
  - Support regeneration projects, refurbishment of buildings and public realm improvements within the retail hierarchy;
  - Ensure the needs for retail and other main town centre uses are met in full. Ensuring that, taking account of commitments as of 1st April 2021, sufficient provision has been made to meet the forecast convenience retail capacity within the borough up to 2038;
  - Ensure that proposals for new development are consistent in terms of scale and function with the size and role of the centre;
  - Support the development of stores for the sale of comparison goods and town centre leisure development within identified opportunity sites where the impact threshold and sequential test is met;
  - Encourage new national retailers to relocate to Copeland's towns, and support and enhance the independent offer;
  - Broaden the offer of Copeland's town centres to increase footfall, and encourage extended lengths of stay, for both the daytime and evening economy;
  - Support proposals for improved digital connectivity and transport improvements in and around the town centre boundaries;
  - Support proposals for new and improved public realm, including public open space, landscaping and other outdoor community areas. The extents of Town centre boundaries are defined at Appendix B.
- 5.37 *Strategic Policy R2PU: Hierarchy of Town Centres* identifies the hierarchy of centres within the Plan area, to support retail, residential, leisure and other main town centre development where it is appropriate to its role, function and position of the settlement. Whitehaven is identified as the Principal Centre.
- 5.38 *Strategic Policy R3PU: Whitehaven Town Centre* supports the role of Whitehaven Town Centre as the Principal Town and development will be encouraged and supported where it:
- Appropriately reflects the Whitehaven Town Centre boundary and Primary Shopping Area in line with the approach set out in Policy R6PU;
  - Accords with the Whitehaven Town Centre and Harbourside Supplementary Planning Document;
  - Encourages evening and night time uses that contribute to the vibrancy, inclusiveness and economic vitality of the centre;
  - Provides Commercial office space in Whitehaven;
  - Builds upon the leisure offer to maximise the location of Whitehaven as a destination within the Lake District Coastal Area;
  - Provides improvements to public realm, shop front aesthetics, linkages and signage;
  - Improves the aesthetics of shop frontages and/or historic attributes;
  - Improves pedestrian movement, connectivity and safety throughout the town centre and in particularly from King Street to the harbour areas;
  - Provides retail, leisure and main town centre frontage along the harbour;
  - Provides improved and new public green space and landscaping;
  - Enhances the gateway sites and approaches into the town centre;
  - Diversifies the range of residential accommodation in the town centre, including the re-use of vacant floors over shops;



- Maintains high standards of design that conserves and enhances elements contributing to the significance of Whitehaven Town Centre and High Street Conservation Area, including principles set out within the Conservation Area Appraisal and Conservation Area Management Plan;
  - Strengthens the historic attributes of the town centre;
  - Incorporates the strategic redevelopment schemes set out in the Whitehaven Masterplan
- 5.39 Development on Opportunity and regeneration sites will be encouraged where proposals meet the requirements of the sequential test and impact threshold.
- 5.40 *Policy R7PU: Sequential Test* states that where an application is for a main town centre use which is neither in a town centre nor in accordance with the Development Plan, applicants must submit details to demonstrate that they have carried out a sequential test to the satisfaction of the Council in accordance with national policy. Locations within a town centre must be considered first, followed by edge of centre sites and only if no suitable sites are available will an out-of-town location be supported.
- 5.41 In the exceptional cases where new retail development will be supported in out-of-town locations, where the sequential test has been satisfied, the development must:
- Avoid or mitigate against harm to the natural environment, including biodiversity assets;
  - Consider and respect the existing landscape and built environment;
  - Ensure that the highway network is capable of supporting additional traffic linked to the use;
- 5.42 This policy does not apply to small scale rural development such as offices although it can be applied to proposals to create new unrestricted retail floorspace through conversion or the removal of restrictive goods conditions.
- 5.43 *Policy R8PU: Retail and Leisure Impact Assessments* requires an Impact Assessment to be submitted where retail or leisure development is proposed outside of a defined centre and the proposed floorspace is equal to or above the following levels. This applies to new retail and leisure developments, those creating retail or leisure mezzanine floorspace and proposals that seek to vary of restrictive conditions.
- **Whitehaven Town Centre and borough wide (excluding the below) – 500sqm (gross)**
  - Within 800m of the respective Key Service Centre town centre boundary – 300sqm (gross)
- 5.44 The Assessment must be proportionate and appropriate to the scale and type of retail or leisure floorspace proposed. The assessment should accord with national planning policy and the scope should be agreed between the applicant and Council prior to submission where possible.
- 5.45 *Strategic Policy N1PU: Conserving and Enhancing Biodiversity and Geodiversity* outlined the Council's commitment to conserving the borough's biodiversity and geodiversity including protected species and habitats.
- 5.46 Potential harmful impacts of any development upon biodiversity and geodiversity must be identified and considered at the earliest stage.
- 5.47 Proposals must demonstrate, to the satisfaction of the Council, that the following mitigation hierarchy must have been undertaken:
- 5.48 **Avoidance** – Biodiversity and geodiversity must be considered when drafting up proposals and any potential harmful effects on biodiversity and geodiversity must be identified along with appropriate measures that will be taken to avoid these effects.



- 5.49 **Mitigation** – Where harmful effects cannot be avoided, they must be appropriately mitigated in order to overcome or reduce negative impacts.
- 5.50 **Compensation** – Where mitigation is not possible or viable or in cases where residual harm would remain following mitigation, harmful effects should be compensated for. Where this is in the form of compensatory habitat of an area of equivalent or greater biodiversity value should be provided. Compensation is a last resort and will only be accepted in exceptional circumstances.
- 5.51 Where harm remains to a National Site Network or Ramsar site, or functionally linked land, development will only be approved where it can be demonstrated that there are imperative reasons of overriding public interest. In such cases, compensatory measures must ensure the overall coherence of the network of European sites as a whole is protected.
- 5.52 Planning permission will be refused for any development if significant harm cannot be avoided, mitigated or compensated for.
- 5.53 *Strategic Policy CO4PU: Sustainable Travel Proposals* states developments must include safe and direct connections to routes that promote active travel, such as cycling and walking routes where appropriate. The Council will also support, in principle, developments which encourages the use of sustainable modes of transport, in particular:
- a) Proposals that have safe and direct connections to routes that promote active travel, such as walking and cycling, and those that provide access to regular public transport services;
  - b) Proposals that enable the sustainable movement of freight;
  - c) Proposals that make provision for electric vehicles;
  - d) Proposals for the integration of electric vehicle charging infrastructure into new developments. This will have different requirements dependent on the scale of development;
  - e) Proposals that take opportunities available to use disused rail track beds to widen sustainable transport choices, encourage active travel within the borough and provide spaces for biodiversity.
- 5.54 New development that would prejudice the future use of disused railway lines that are well connected either to settlements, other sustainable travel routes or key tourist facilities within the open countryside for this purpose will only be considered in exceptional circumstances.
- 5.55 Developments that are likely to generate a large amount of movement will be required to secure an appropriate Travel Plan and be supported by a Transport Assessment in line with the Cumbria Design Guide (or any document that replaces it).
- 5.56 *Policy CO7PU: Parking Standards and Electric Vehicle Charging Infrastructure* requires proposals for new development will be required to provide adequate parking provision in accordance with the Cumbria Development Design Guide (or any document that replaces it) where appropriate. There will also be a requirement for the provision of secure cycle parking in all new car parks as well as accessible parking bays and associated development.
- 5.57 Development will be supported where it accords with the Whitehaven Parking Strategy. Proposals that provide new or improved Park and Ride Facilities for local employment and development sites will be supported where they will provide demonstrable benefits and will be situated in appropriate locations.
- 5.58 All new development should integrate new Electric Vehicle Charging Infrastructure as follows:



- For new residential development, one charging point must be provided per dwelling with off street parking. Where off street parking is not provided, a commuted sum will be required to provide charging facilities in the immediate locality.
- For non-residential development, at least one charging point must be provided per 10 spaces and the infrastructure to enable future installation of charging points in every parking bay. Consideration should be given to grouping parking bays to optimise provision of charging infrastructure.

## **Whitehaven Town Centre and Harbourside SPD (2012)**

- 5.59 The Whitehaven Town Centre and Harbourside SPD provides design guidance for future development in Whitehaven Town Centre and the adjacent harbourside area, particularly those Regeneration Priority Sites identified within the adopted Local Plan. Given this SPD is also referenced in the emerging Local Plan, it is presumed it will continue forward across the emerging plan period despite its' historic nature – being adopted in 2012.
- 5.60 The Site lies within the SPD boundary area with the reference 'Former Council Depot and adjoining land at Ginns' – WEOS5. The following notable guidelines are provided in relation to the Site:
- Interest in this former workshop site in the past has come from a major retailer for supermarket use – in a prominent position on the corner of two important approaches to the Town Centre;
  - Major development opportunity on a key gateway route into the Town Centre;
  - Could accommodate a significant high-density, mixed-use development – ideally innovative to support the proposed Sports Village (across the road at Pow Beck);
  - Opportunity to provide a high-quality environment for the cycle path running through the site should be exploited, design should maximise connectivity between Pow Beck and Town Centre; and
  - New development should extend to the back of the footpath to restore the building line on Preston Street, Ginns and Coach Road and provide a strong building edge around the Coach Road/Ginns Corner.

## **National Planning Policy Framework (July 2021)**

- 5.61 On 20 July 2021 the Government published a revised version of the NPPF. The most recent NPPF is a material consideration in the determination of all planning applications and fully replaces the previous editions.
- 5.62 The NPPF does not change the statutory status of the Development Plan as the starting point for decision making. It advises that proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.
- 5.63 The overall emphasis of the NPPF is to reiterate the Government's key objectives of facilitating economic growth and securing sustainable development. These overarching policies seek to deliver development in the most appropriate locations, thereby protecting and enhancing the environment.

## **Presumption in Favour of Sustainable Development**

- 5.64 Central to the NPPF is a presumption in favour of sustainable development and the need for the planning system to support economic growth in line with the Planning for Growth Ministerial Statement. Paragraph 11 sets out the presumption in favour of sustainable development and the application of the policy for decision making. It states:



*“Plans and decisions should apply a presumption in favour of sustainable development. For **decision-taking** this means:*

*Approving development proposals that accord with an up-to-date Development Plan without delay;  
or*

*Where there are no relevant Development Plan policies, or policies which are most important for determining the application are out-of-date, granting permission unless:*

- i. the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole”.*

5.65 Paragraph 12 sets out that the presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. Finally, Paragraph 12 is clear that Local Planning Authorities can take decisions that depart from an up-to-date development plan, but only if material considerations in a particular case indicate that the plan should not be followed.

## Ensuring the vitality of town centres

5.66 Town centre policies are dealt with at Section 7 of the NPPF ‘Ensuring the vitality of town centres’. With regards the sequential test in particular, Paragraph 87 of the national policy document explains that:

*“Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered”.*

5.67 ‘Main town centre’ uses are defined within Annex 2 of the NPPF as: retail development, leisure, entertainment facilities, more intensive sport and recreation uses (including restaurants), offices, arts, culture and tourism development (including hotels).

5.68 Importantly, Paragraph 88 of the NPPF explains that when considering edge-of-centre and out-of-centre proposals in the context of the sequential approach, preference should be given to accessible sites which are well connected to the town centre. It also states that applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre sites are fully explored.

5.69 Paragraph 90 states that when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, LPAs should require an impact assessment if the development is over a proportionate, locally set threshold (or otherwise over 2,500 sq. m). This should include an assessment of:

- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and,



- the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

5.70 Finally, Paragraph 91 of the NPPF states that where an application fails to satisfy the sequential test it should be refused. The implication being that were such a policy conflict is not identified planning permission should be granted.

## Other Guidance

### National Planning Practice Guidance

- 5.71 On 6th March 2014 the *Department for Communities and Local Government* ('DCLG') launched the *Planning Practice Guidance* ('Practice Guidance') web-based resource. The Practice Guidance does not constitute a statement of Government policy; however, as a guide to interpreting how policy should be applied, it may be material to individual planning decisions.
- 5.72 Of particular relevance to applications for retail development is the chapter titled 'Town Centres and Retail'. This provides guidance on the interpretation of the sequential and impact tests, amongst other matters. A summary of the key sections within this chapter are set out below.
- 5.73 The section, '*What is the sequential test?*' explains that the purpose of the sequential test is to guide 'main town centre uses' towards town centre locations first, and then, if no town centre locations are available, to out-of-centre locations, with a preference for accessible sites which are well connected to the town centre.
- 5.74 When applying the sequential test as part of the decision-making process, the Practice Guidance explains that it is for applicants to demonstrate compliance and that failure to undertake the exercise could in itself constitute a reason for refusing planning permission.
- 5.75 There are a number of considerations that should be taken into account in determining whether a proposal complies with the sequential test. Of particular significance is the requirement to examine whether there is scope for 'flexibility' in the format and/or scale of the proposal. In the case of retail and leisure development, this typically involves considering whether there is any 'flexibility' in a specific business model. For example, are multi-level formats possible? Whether flexible car parking arrangements can be pursued? Innovative servicing solutions introduced? Or a willingness to depart from standard formats explored. It is significant that 'disaggregation' (breaking a scheme up across several sites) is not identified as a matter necessary for consideration in demonstrating 'flexibility' in the context of the sequential test.
- 5.76 The section, '*How should locational requirements be considered in the sequential test?*' highlights that the use of the sequential test should recognise that some 'main town centre uses' have particular market and locational requirements. This means that certain uses may only be accommodated in specific locations and Local Planning Authorities should be acceptant of this where a robust justification is provided. See Paragraph: 012 / Reference ID: 2b-012-20190722.
- 5.77 The section, '*How should viability be promoted?*' emphasises that whilst the sequential test seeks to deliver the Government's 'town centre first' policy, promoting new development on town centre locations can be more expensive and complicated than building elsewhere and Local Planning Authorities therefore need to be realistic and flexible in terms of their expectations.
- 5.78 In terms of the retail impact test, of greatest relevance to any quantitative analysis is considered to be paragraph 15 (Reference ID: 2b-015-20190722) of the guidance, which explains that as a guiding



principal impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). It continues that retail uses tend to compete with their most comparable, competitive facilities and that conditions may be attached to appropriately control the impact of a particular use.

- 5.79 With regards impact on investment, paragraph 15 (Reference ID: 2b-015-20190722) explains that where wider town centre developments or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment and that key considerations will include:
- the policy status of the investment (i.e. whether it is outlined in the Development Plan);
  - the progress made towards securing the investment (for example if contracts are established); and,
  - the extent to which an application is likely to undermine planned developments or investments based on the effects on current/forecast turnovers, operator demand and investor confidence.
- 5.80 Paragraph 17 (Reference ID: 2b-017-20190722) explains that the retail impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Meanwhile, paragraph 18 (Reference ID: 2b-018-20190722) states that the judgement as to whether the likely adverse impacts are 'significant' can only be reached in light of local circumstances. For example, in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.

## Summary

- 5.81 This section has detailed the relevant policies of the adopted and emerging Development Plan; as well as policies at a national level and other material considerations which have been considered as part of the preparation of this application. These matters will be weighed in the planning balance Section of this Statement.



## 6. The Sequential Test

- 6.1 Paragraph 87 of the NPPF (2021) requires that the sequential approach to site selection is applied to all proposals for 'main town centre uses' on sites that are not 'in' an existing centre nor in accordance with an up-to-date development plan.
- 6.2 In this instance, the nearest defined centre is Whitehaven Town Centre, located to the north of the planning application site. As the application site is well connected to, and within 300m of the town centre, it can be classified as 'edge of centre'. It is therefore necessary to assess any opportunities within Whitehaven town centre. Furthermore, the emerging local plan (at policy R7PU) notes that Opportunity Sites (which includes the application site, 'OWH05') should be given precedence in finding new development sites as part of the sequential test. Whilst not strictly necessary, we have also considered certain other allocated 'edge of centre' sites from the adopted and emerging local plan to present a sufficiently robust assessment.

### Scale and Form of Development, Catchment Area and Centres Assessed

- 6.3 Whilst both the NPPF and Planning Practice Guidance ('PPG') are silent on the appropriate area of search for sequentially superior sites, a conventional approach is to consider the extent of the catchment area likely to be served by the proposal and then to identify alternative sites, located within or on the edge of existing centres which serve an equivalent catchment, and which could accommodate the scale and form of development proposed. In this case, the scope of the assessment therefore comprises Whitehaven town centre.

### Scale and Form of Development

- 6.4 In this instance, the scale and form of retail development is a discount foodstore of 1,916 sq. m GIA (1,356 sq. m net sales) alongside requisite customer car parking (100 spaces), vehicular access roads, servicing area, and associated hard and soft landscaping. This is located on a site of 1 hectare (2.49 acres). Accordingly, it is necessary to define an area of search for sequentially preferable sites based purely on the specific trading characteristics of a retail development of this size.
- 6.5 The proposals are a relocation to provide a scale and form of retail development identified by ALDI as being required to appropriately serve Whitehaven. As this is the store size and associated development required for this particular town, it is these characteristics that have been used as the basis for this sequential assessment. To summarise, these comprise:
- A Gross Internal Area of 1,916sqm, allowing for a net sales area of 1,356 sqm, of which 1,085 sqm comprises convenience sales.
  - Customer Parking of at least 100 spaces.
  - A minimum site area of 2.49 acres (1 hectare)

### Primary Catchment Area

- 6.6 The 'Town Centres and Retail' section of the Planning Practice Guidance explains that the "application of the [sequential] test will need to be proportionate and appropriate for the given proposal" (Reference ID: 2b-011-20190722). To our mind this statement is of particular significance to the delineation of a primary catchment area for the purposes of the sequential test's application. It reflects the conventional and long-standing approach of defining a catchment for the retail use in question based upon: the area from which the majority of its trade will be drawn (i.e. its sphere of influence based on



size, offer, etc.); and, existing surrounding competition which might equally influence future patterns of trade.

- 6.7 A discount foodstore's limited size and offer provides a strong indication that its catchment area will not be particularly extensive and is unlikely to extend significantly beyond a 5-minute drivetime from the proposed store. In this case, a 7-minute drivetime is appropriate to cover all of Whitehaven, which is the customer base that ALDI is intending to serve by virtue of this new store. This represents their 'Primary Catchment Area' and the area from which the vast majority of their trade will be drawn.
- 6.8 It should be made clear that this seven-minute drive-time catchment area is not just some arbitrary distance based on ALDI's commercial preferences, instead it is a reasonable and realistic geographic area from which a foodstore of this size will draw the vast majority of its trade.

### **Centres Assessed**

- 6.9 For the purposes of undertaken this sequential assessment, a seven-minute off-peak drive-time from the planning application site includes Whitehaven Town Centre.
- 6.10 In line with both local and national planning policy it is therefore appropriate to assess whether there are any sequentially preferable alternative sites within Whitehaven Town Centre.

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

- 6.11 Drawing the above together, in this case a logical area of search for sequentially preferable sites should encompass 'in-centre' opportunities within Whitehaven town centre. Within the defined area of search, candidate sites must be able to accommodate (as a minimum) an ALDI discount foodstore and its associated car parking, access arrangements and hard and soft landscaping – as this is the scale and form of development that is proposed. A site will be considered sequentially preferable where it is 'suitable' and 'available' which necessarily includes consideration of deliverability / viability.
- 6.12 Whilst in this case the total site area is 1 hectare, it is necessary for applicants and Local Planning Authorities to demonstrate 'flexibility' in their approach, in-line with Paragraph 88 of the NPPF. This can involve reducing down the site area for testing purposes to one which is commensurate purely with the scale and form of the 'main town centre' use floorspace proposed and its essential supporting infrastructure. This policy requirement and relevant legal / appeal precedents are examined in detail under the following headings.

## **The Requirement to Demonstrate Flexibility / Legal and Appeal Precedents**

- 6.13 Paragraph 88 of the NPPF requires applicants and Local Planning Authorities to demonstrate 'flexibility' on issues such as format and scale when considering sites in, or on the edge, of existing centres as part of applying the sequential test. Whilst no indication as to what degree of flexibility is required is contained within the NPPF or indeed the Practice Guidance (other than 'format and scale') the 'Rushden Lakes' Secretary of State ('SoS') Call-in decision<sup>1</sup> (which post-dates their original publication) has clarified the position, with the Inspector (Paragraph 8.49) highlighting that 'flexibility' concerns matters including *"flexibility in a business model, use of multi-level stores, flexible car parking requirements or arrangements, innovative servicing solutions and a willingness to depart from standard formats"*. In Paragraph 15 of the decision letter, the SoS agrees with the Inspector that these are issues of principal relevance in demonstrating flexibility.

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



- 6.14 This important Call-in decision has also provided clarity on whether there remains a requirement to consider 'disaggregation'<sup>2</sup> when demonstrating flexibility as part of the sequential test. The Inspector is quite clear at Paragraph 8.47 of his report that *"there is no longer any such requirement stated in the NPPF"* and that *"had the Government intended to retain disaggregation as a requirement it would and should have explicitly stated this in the NPPF"*. In Paragraph 16 of the decision letter, the SoS agrees with the Inspector that there is no requirement to consider disaggregation when applying the sequential test. This approach has been followed in subsequent cases (see below).
- 6.15 A final matter of seminal importance when considering 'flexibility' and indeed interpreting the sequential test more widely is the *Tesco Stores Ltd v Dundee City Council* ('Dundee') Supreme Court Decision (2012). In summary, this establishes that:
- if a site is not suitable for the commercial requirements of the developer in question, then it is not a 'suitable' site for the purposes of the sequential approach; and,
  - that in terms of the size of the alternative site, provided that the applicant has demonstrated 'flexibility' with regards to format and scale (explained in the paragraph above), the question is then whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to physically fit the alternative site.
- 6.16 The implications of the Dundee decision were also considered by the SoS as part of the 'Rushden Lakes' Call-in decision. In Paragraph 15 of the decision letter, the SoS agrees with the Inspector that the sequential test relates entirely to the application proposal and whether it can be accommodated on an actual alternative site. In other words, the Dundee decision clearly applies to the NPPF.
- 6.17 Two further relatively recent High Court decisions<sup>3</sup> have also considered (inter alia) the sequential test and confirmed the importance of demonstrating flexibility on issues such as format and scale. A developer's own intentions may be taken into account and have a bearing – for instance when considering what demand a proposal is intended to meet. However, the sequential approach should be 'operator blind' and not become a self-fulfilling activity and divorced from the public interest.
- 6.18 Specifically, in *Aldergate Properties Limited v Mansfield District Council* [2016] EWHC 1670 [Admin] the judgement emphasised that in considering how to apply 'suitability' and 'availability' the general meaning would be that a site should be *"... 'suitable' and 'available' for the broad type of development which is proposed in the application by approximate size, type and range of goods. This incorporates the requirement for flexibility in [24] NPPF, and excludes, generally, the identify and personal or corporate attitudes of an individual retailer...."* (Paragraph 35 of Judgement).
- 6.19 In summary, whilst it is necessary for applicants to demonstrate 'flexibility' on issues such as format and scale when applying the sequential test, it is clear that under the NPPF there is no requirement to consider 'disaggregation' nor to explore changes that would materially alter the application proposal such that it no longer met commercial requirements (i.e. a material reduction in size). These matters have been considered as part of numerous 'call-in' and appeal decisions<sup>4</sup> which post-date the publication of the NPPF and in which the SoS / Planning Inspectorate clearly draw heavily on the key caselaw referenced in this section when interpreting the sequential test (and specifically the requirement for disaggregation).

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

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

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



## Flexibility in the Context of the Application Proposals

- 6.20 ALDI recognises the need for 'flexibility' in promoting sites for development and the retailer pursues non-standard stores where this will assist in meeting planning policy requirements. When considering the scope for flexibility, however, the inherent nature of ALDI's operation as a 'deep discount' food retailer must be borne in mind. Accordingly, there are a number of key areas where it is not possible to alter the core design of the store; as to do so would undermine the operational efficiency of the business model and hence its viability.
- 6.21 The fundamental requirements of a modern ALDI foodstore's design and layout are therefore as follows:
- **Retail Sales Area:** This is the most important aspect of store building design. A circa 1,300 sq. m sales floor area is required to provide approximately 2,000 core product lines, and the dimensions of the retail area are determined by the need to ensure adequate product display space is provided. The rectangular shape of the retail sales area is also specifically designed to enable efficient transfer of products. In view of its critical importance to the trading and operational success of ALDI's business, the size and proportions (shape) of net retail floorspace is one area where it is not possible for ALDI to depart from their core design, as to do so would undermine trading viability. Such a configuration is coincidentally an optimum solution to enable shoppers to shop whilst respecting social distancing and cannot reasonably be reduced.
  - **Storage and Ancillary Non-Retail Floorspace:** Where the size and shape of a particular site requires reconfiguration, ALDI can exhibit flexibility, such as compromising service and storage facilities. However, the foodstore must be capable of being serviced by a HGV delivery vehicle and the Site layout must enable the delivery vehicle to enter and leave in forward gear, and for the vehicle to be able to dock correctly and safely in the purpose-built delivery area of the store (a dock-leveller).
  - **Customer Car Parking:** ALDI foodstores are required to have immediately adjacent surface-level car parking facilities. This is because an ALDI foodstore's primary function is to cater for 'bulk' food shopping needs and therefore very many customers will be visiting to undertake a 'weekly' shopping trip, involving several heavy shopping bags. Customers may also be visiting to purchase a product from ALDI's non-food 'special buy' range which could be large / heavy and therefore unmanageable on foot. Accordingly, it is a pre-requisite that most customers have the opportunity to take their goods home via private car, irrespective of the accessibility of the store location via sustainable modes of transport, for those undertaking smaller basket shopping.
- 6.22 Based on the above identified areas where 'flexibility' can be demonstrated in relation to this specific scheme, it is considered that a site area requirement could be reduced to **0.8ha** (reduction of 20%), which is regarded as the minimum realistically necessary to accommodate a discount foodstore and its supporting site infrastructure (i.e. customer car parking, vehicular access/egress, servicing area, pedestrian circulation space and basic landscaping).
- 6.23 In summary, measures have evidently been taken in the design of the scheme to maximise 'flexibility' in terms of the scale and form of foodstore development proposed. Notwithstanding this, for the purposes of the sequential assessment, the applicants have tested a considerably smaller site area than is actually proposed as part of this planning application (reduction by some 20% from 1 hectare to 0.8ha). Thus, the applicants are clearly demonstrating 'flexibility' in line with the NPPF's requirements.



## Sequential Site Assessment

- 6.24 Having established the appropriate catchment area, the centre to be assessed within it, and the scale and form of retail development to be tested (having regard to flexibility); this analysis now turns to consider any candidate sites which are potentially 'suitable' and 'available'. A completed set of Sequential Assessment Site Proformas is therefore set out at **Appendix 6**, with each of these sites identified on the Sequential Assessment Site Plan at **Appendix 5**.
- 6.25 The sequential assessment at **Appendix 6** has demonstrated that there are no sequentially preferable development sites within Whitehaven town centre which could realistically accommodate the scale and form of retail development for which planning permission is sought – even when demonstrating significant flexibility in terms of developable area. The same applies in respect of certain other edge of centre sites that were assessed even though this is not strictly necessary in this case given that the application site occupies an edge of centre location also. Finally, it is worth reiterating how the emerging local plan (at policy R7PU) notes that Opportunity Sites (including the application site, 'OWH05') should be given precedence in finding new development sites as part of the sequential test.
- 6.26 Overall, for the reasons outlined in this section, it is considered that there are no more 'suitable' and 'available' sites for the scale and form of development proposed and compliance can therefore be demonstrated with the sequential approach to site selection as set out in Paragraph 87 of the NPPF.



## 7. The Retail Impact Assessment

- 7.1 Paragraph 88 of the NPPF identifies that local planning authorities should require an impact assessment to be submitted in support of planning applications for 'main town centre uses' over 2,500sq.m (unless a local planning policy sets a lower threshold), on sites outside town centres, and that are not in accordance with an up-to-date Development Plan. The impact assessment should include a consideration of:
- The impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and,
  - The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment.
- 7.2 With regards local planning policy concerning the vitality and viability of defined centres, reference is made to the NPPF and the requirement for impacts assessments on developments outside centres and over the default threshold of 2,500m2. As the application proposals fall below the NPPF threshold, there is no obvious requirement to undertake an impact assessment. However, in the interests of presenting a robust assessment of all policy matters, this has therefore been produced to support consideration of the planning application.
- 7.3 In interpreting national town centre policy concerning retail impact, it is noteworthy that Paragraph 90 of the NPPF states that where an application is likely to give rise to a 'significant adverse impact' it should be refused. The implication being that an impact which is merely 'adverse' is not a direct reason for refusal and is capable of being weighed against positive social, economic, and environmental impacts in the overall planning balance. Indeed, Paragraph 11 of the NPPF confirms a presumption in favour of sustainable development and is clear that planning permission for development should be granted unless: *"any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when considered against the policies in this document as a whole"*.
- 7.4 Through the impact assessment required by national policies, it is necessary to demonstrate that there would be no 'significant adverse' impact in two main regards. The first is on existing, committed and planned public and private investment in a centre, whilst the second is on town centre vitality and viability including local consumer choice and trade in the town centre and wider area.
- 7.5 Each of these tests are considered in turn within this section of our report. This Statement will focus firstly upon impact on trade / vitality and viability and secondly on impact on investment, principally because a number of the conclusions in relation to 'impact on investment' are informed by the retail impact assessment, discussed as part of the impact on trade section.

### Impact on Town Centre Vitality and Viability

- 7.6 Applicants are required to assess the impact of out-of-centre retail proposals on town centre vitality and viability, having regard to both local consumer choice and trade in the centre and wider catchment area.
- 7.7 Paragraph 89 of the NPPF requires the preparation of a RIA in order to examine impacts upon trade and this can be found at **Appendix 8** of this Statement. In the interests of clarity, this Statement assesses retail impact by following a standard and recognised step-by-step methodology (as set out within the Planning Practice Guidance). This Statement summarises the approach and findings of this assessment through the headings set out below.



## Catchment Area

- 7.8 A discount foodstore's limited size and offer provides a strong indication that its catchment area will not be particularly extensive and is unlikely to extend significantly beyond a 5-minute drivetime from the proposed store. In this case, a 7-minute drivetime is appropriate to cover all of Whitehaven, which is the customer base that ALDI is intending to serve by virtue of this new store. This represents their 'Primary Catchment Area' and the area from which the vast majority of their trade will be drawn.
- 7.9 It should be made clear that this seven-minute drive-time catchment area is not just some arbitrary distance based on ALDI's commercial preferences, instead it is a reasonable and realistic geographic area from which a foodstore of this size will draw the vast majority of its trade.
- 7.10 In seeking to find shopping pattern data which is broadly reflective of this anticipated seven-minute drive-time catchment area, Avison Young have had regard to the advice contained within the Planning Practice Guidance which states that: *"the impact test will need to be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible"* (Town Centres and Retail, Paragraph: 017, Reference ID: 2b-017-20190722).
- 7.11 As such, appropriate consideration has been given to the West Cumbria Retail, Town Centres and Leisure Study of August 2020 ('the 2020 study') and its subsequent 2021 Update ('the 2021 study update'), both undertaken by Nexus Planning.
- 7.12 Household survey results that were undertaken to inform the 2020 study have been used to understand wider shopping patterns. **Appendix 2** of this Statement reproduces the Study Area Plan from the 2020 study. **Appendix 3** shows the primary catchment for the proposal (blue polygon) based on a 7-minute off peak drive-time isochrone from the site as explained above. For context, it also shows the primary catchment in relation to the relevant zone from the 2020 study, being Zone 6 - Whitehaven.
- 7.13 In summary, the defined primary catchment area is proportionate to the trading influence of the proposed retail development, on the basis of its geographical location and surrounding competition. The area assessed is considered to be a representative catchment area for the scale and form of retail development proposed, in-line with the advice provided in the Practice Guidance.

## Convenience Goods Impact

### Table 1 – Turnover of Proposed Development

- 7.14 Table 1 of **Appendix 8** (RIA) estimates the convenience and comparison goods turnover of the proposal. The ALDI store will have a total net sales area of 1,356 sqm. Of this sales area the vast majority will be given over to the sale of convenience goods (80% / 1,085 sqm), with the remainder used for the sale of a purely ancillary range of non-food (comparison) goods (20% / 271 sqm). The foodstore's convenience / comparison goods floorspace split has been provided by ALDI and the retailer would be willing to accept a planning condition limiting trading floorspace to the percentages tested.
- 7.15 A sales density of £11,427 per square metre (2021 Prices) has been applied to the convenience goods floorspace of 1,085 sqm and grown to 2023, the base year, providing a maximum convenience goods turnover of £11.83m. This is anticipated to increase by a small degree by the test year of 2026 (£12.19m) (Source: Experian Retail Planner Briefing Note 20 (February 2023)). This sales density is drawn directly from Global Data 2022.



- 7.16 In terms of comparison goods foodstore, a sales density of £7,448 per square metre has been applied to the proposed ALDI floorspace of 271sqm and grown to the base year, to provide a maximum comparison goods turnover of £2.09m in 2023 (increasing to £2.16m in 2026).
- 7.17 Finally, it should be noted that for both the convenience and comparison goods elements of the proposals, sales densities have been projected forwards using Experian's latest floorspace efficiency growth assumptions from Figures 4a and 4b (Page 16) of the Experian Retail Planner Briefing Note 20 (February 2023). This briefing note has been prepared following the height of the Covid-19 pandemic and therefore takes into account the latest economic implications for sales densities over the period to our test year of 2026.

### Population (Table 2a)

- 7.18 The base population at 2023 within the study area (being that used for the 2020 study) has been sourced directly from up-to-date Experian Location Analyst data (March 2023 Report). The baseline population has then been projected forward to the test year of 2026 in line with Experian's growth forecasts (utilising the March 2023 data report).
- 7.19 On this basis, the defined study area is identified to contain a resident population of approximately 164,312 people in 2023, which is set to decrease to 163,783 people by the test year of 2026.

### Per Capita Expenditure Assumptions (Tables 2b & c)

- 7.20 Per capita convenience base expenditure data for our catchment area has been sourced from up-to-date catchment specific Experian Location Analyst data (October 2023 Report). Our analysis of convenience goods (Table 2b) expenditure capacity then draws upon 'forecast' growth rates as set out under Figure 6, Appendix 3, of the Experian Retail Planner Briefing Note 20 (February 2023).
- 7.21 In terms of an allowance for Non-Store Retail Trade (NSRT) / Special Forms of Trading (SFT) – such as online shopping, etc. – our assessment is based on the allowance identified at Figure 5, Appendix 3, Page 20, of Experian's Retail Planner Briefing Note 20, February 2023 (the latest available). This is based upon assumptions by Experian in regard to the sourcing of on-line food purchases (i.e. the proportion which is actually supplied from the shelves of stores vs. deliveries from non-retail distribution centres to private residences).

### Total Convenience Goods Expenditure (Table 2d)

- 7.22 Table 2d of **Appendix 8** combines population and per capita expenditure estimates to establish total available convenience expenditure respectively within the study area. Table 2d shows that there will be approximately £411.18m convenience goods expenditure within the study area at our test year in 2026.

### Convenience Goods Shopping Patterns (Table 3)

- 7.23 Table 3 of **Appendix 8** utilises the household survey data undertaken by NEMS for the 2020 study and which is shown at Table 3 (Convenience goods shopping patterns) of both the 2020 study and 2021 study update.

### Convenience Goods Shopping Patterns (£m) in 2023 and 2026 (Tables 4 and 5)

- 7.24 Tables 4 and 5 undertake the conventional process of applying the total convenience goods expenditure for each zone to the 'main food' and 'top-up' convenience goods shopping patterns as established by the household telephone shopper survey referred to above.



- 7.25 As evidenced within the 2020 study and 2021 update, a number of main foodstore operators in Whitehaven continue to trade at levels well in excess of their respective benchmark turnovers. This includes the existing ALDI store.
- 7.26 As has already been explained, the primary catchment area is wholly situated within zone 6 (Whitehaven) of the study area and it is from this zone that the vast majority of the development's trade will be drawn. Notably, **94%** (£84.9m in 2026) of the convenience goods expenditure generated by zone 6 is retained within this area.

### **Anticipated Convenience Trade Draw to Development and Retail Impact (Tables 6, 7, and 8)**

- 7.27 The proposal's convenience goods trade allocation / diversion is set out at Tables 6 and 7 of **Appendix 8** and has been informed by the Planning Practice Guidance; which states that a common starting point for the exercise is to consider the catchment's existing shopping patterns (in this case provided by the NEMS household survey) and to then apportion the trade to be diverted based upon the character of development ('like affecting like'), popularity (based upon existing shopping patterns / Avison Young observations), geographic location (proximity) and brand loyalty factors (i.e. are catchment residents already using ALDI).
- 7.28 As a starting point, it should be noted that Tables 6 and 7 of our RIA (**Appendix 8**) confirm that the vast majority (90%) of the proposed scheme's turnover will be derived from the primary catchment area, being within zone 6 of the study area. Only 10% is assumed to be drawn from beyond this area (zone 7).
- 7.29 As set out in earlier sections, the existing ALDI store is now the smallest one in Cumbria and no longer meets the modern standards required by ALDI or its dedicated customer base. ALDI has explored a number of options to deliver an improved customer experience at the existing store and extended it in 2007. However, there are a number of constraints on the existing site, meaning the only viable option to safeguard ALDI's future in the area is to relocate to the proposed new site nearby. As the proposed new store has been conceived as a replacement for the existing store, it is entirely appropriate to assume that trade will therefore be drawn accordingly, and this is reflected in Table 7.
- 7.30 As set out elsewhere in Table 7, the anticipated trade draw allocations to the proposed new ALDI would not therefore result in any impacts on designated centres.
- 7.31 Table 8 contemplates any impacts arising from the reoccupation of their existing store by a new retailer.
- 7.32 Table 8a shows the survey based convenience goods turnover of the existing ALDI store, being £26.06m. When this is compared with the company average convenience goods turnover of £8.45m, it is clear that the existing ALDI store is significantly overtrading. This reinforces ALDI's decision to relocate to a new larger store.
- 7.33 Table 8b takes the survey based convenience goods turnover of the existing ALDI store and introduces the convenience goods turnover of the proposed new ALDI store as shown at Table 1, being £26.06m and £12.19m respectively. Following relocation to the new store, this would therefore result in a residual turnover of £13.88m.
- 7.34 As set out in earlier sections of this statement, ALDI's intentions for their existing store (should planning permission be forthcoming for a new store) would be to ensure that the vitality and viability of the area is maintained by seeking its re-occupation for other footfall generating uses. Insofar as it relates to assessing impact matters, a worst-case scenario would therefore involve a foodstore



operator taking occupation on the basis that convenience expenditure generates the highest sales densities and turnover.

- 7.35 Table 8c considers the turnover of a new foodstore operator occupying the existing ALDI store. This is based on a combination of the scale of retail unit in question and retailers who do not already retain a presence within Whitehaven. This suggests that the existing store could be reoccupied by the likes of LIDL, Farmfoods or M&S Simply Food. On this basis, an average net convenience sales floorspace, sales density and associated turnover has been derived as shown at Table 8c, with the latter being £7.47m at 2026.
- 7.36 Taking the residual turnover of £13.88m referred to above (following ALDI's relocation to their new store), Table 8b further demonstrates how this would be more than sufficient to absorb a turnover of £7.47m in the scenario that a new foodstore operator takes occupation of the vacated store. It therefore follows that no retail impacts would arise.
- 7.37 Drawing the above points together, it is clear that the trading effects of the retail proposals, together with reoccupation of the existing ALDI store by a new foodstore operator, will not give rise to any retail impacts on designated centres within the primary catchment area, namely Whitehaven Town Centre.

## Vitality and Viability of Whitehaven Town Centre

- 7.38 Whilst the preceding section has confirmed that no retail impacts would arise in relation to designated centres (being Whitehaven Town Centre); in considering what this will actually mean for their vitality and viability, it is important to provide a proportionate commentary on their current health, role and function.
- 7.39 Accordingly, **Appendix 7** of this Statement presents a detailed health check assessment of Whitehaven Town Centre considering the recognised indicators of vitality and viability.
- 7.40 It is evident that Whitehaven performs an important role in catering for the retail and service needs of what was the Copeland Borough and to some extent the wider surrounding area, albeit on a relatively localised basis given the proximity of Workington, and further afield, Carlisle. In particular, the convenience offer (including edge of centre locations) is strong and clearly makes a significant contribution to sustaining the centre overall.
- 7.41 The centre has a strong cultural and tourist offer due to the prosperous history of the town and the harbour area which provides a pleasant visual quality and public realm. There are numerous historic and Listed Buildings throughout the centre which contribute to its vitality and attractiveness also.
- 7.42 In summary, there are certain functions of the town centre that are performing well, and others (like many such centres) that are performing more modestly. Overall, the centre appeared to attract good levels of footfall and demonstrates some good signs of vitality and viability.

## Impact on Existing, Committed or Planned Investment in Centres

- 7.43 Given the conclusions reached in relation to retail impact matters above, there are no implications arising from these proposals in relation to impacts on existing, committed or planned investment in Whitehaven Town Centre.



## 8. Other Planning Policy Matters

- 8.1 The purpose of this Section is to assess the application proposals in the context of all remaining relevant planning policy and guidance at the national and local level.

### Principle Of Development

- 8.2 The starting point for assessing the acceptability of the principle of the proposed development in this location is the policies of the adopted development plan. Policy ST1 sets out the strategic development principles for the plan area, which, amongst other aims, includes focussing development in the main towns where there is previously developed land, and vacant or derelict sites can be restored. As the Principal Town, Whitehaven is the highest order centre in the Retail Hierarchy as defined by Policy ER7 and Emerging Strategic Policy DS3PU. Policy ST2 directs development to the most sustainable locations, which is defined as the main settlements.
- 8.3 However, the site is located outside of the designated town centre boundary for Whitehaven. Retail development should be directed to identified town centre locations.
- 8.4 Saved Policy EMP3 identifies the application site as part of Employment Opportunity Site WE0S5 'Land at Ginns' as a site for potential future development to contribute to regeneration strategies in the Borough.
- 8.5 Emerging Strategic Policy E6PU: Opportunity Sites sets out Council support for the development and/or redevelopment of Opportunity Sites in and on the edge of the towns of Whitehaven, Cleator Moor, Egremont and Millom as the focus to help regenerate these towns. Site WE0S5 'Land at Ginns' identified in Saved Policy EMP3 is carried forward and given reference OWH05 'Land at Ginns'. This is recognised as a 2.98ha site, suitable for 'all town centre uses; also suitable for employment uses B, C, E, F and Sui Generis (town centre appropriate) uses'.
- 8.6 The proposed use would therefore comply with the uses listed in planning policy, although the site should be considered edge-of-centre. Emerging Policy R7PU 'Sequential Test' sets out the Council's approach to sequential assessment, which broadly aligns with National Policy. However, the supporting text for this policy importantly highlights that the range of Opportunity Sites within and on the edge of Whitehaven in need of regeneration, as identified at Policy E6PU, should be given consideration when carrying out the sequential test.
- 8.7 It is therefore considered that the proposed development is appropriate for the site in land use terms and compliant with the planning policy framework. The applicant has complied with the requirements to attempt to locate the proposed development on suitable, available and viable sites within Whitehaven centre and has not identified any available sites which meets the requirements. The next sequentially preferable type of site for convenience retail would be opportunity sites and/or edge-of-centre sites, of which the application site is both. Therefore, the application site should be considered the most appropriate available site for a new food store.
- 8.8 It has been demonstrated that the proposed development will not have a significant adverse impact on either, the vitality or viability of Whitehaven Town Centre, or existing, committed or planned public and private investment in Whitehaven Town Centre. The proposed development should therefore be considered acceptable in principle.



## Transportation and Access

- 8.9 Transport and accessibility issues are covered in detail within the supporting *Transport Assessment* and *Interim Travel Plan* prepared by Andrew Moseley Associates (AMA). Some of the key conclusions which are relevant to the objectives of Policy T1 and Emerging Policies CO4PU and DM22.
- 8.10 Customer vehicular, walking and cycling access is provided at the north west extent of the site via a proposed new simple priority-controlled T-junction with Preston Street.
- 8.11 The development proposals will be accessible by a range of travel modes and have been developed in accordance with current national and local transport policies, including those set out within the NPPF and the Copeland Local Plan.
- 8.12 The site is accessible on foot and by cycle from the surrounding residential area. Furthermore, a range of key facilities and services can be accessed from the site, supporting future employees and linked trips for customers.
- 8.13 The development proposals are forecast to generate the following additional vehicular trips during the highway network peak hours:
- Friday AM Peak – +3 Arrivals and +3 Departures – +6 Two-Way Trips
  - Friday PM Peak – +4 Arrivals and +4 Departures – +8 Two-Way Trips
  - Saturday Peak – +7 Arrivals and +8 Departures – +15 Two-Way Trips
- 8.14 An articulated vehicle can satisfactorily access and egress the site in forward gear. Deliveries would continue to be managed to ensure minimal conflicts with other site users.
- 8.15 The minimal uplift in trips associated with the relocation proposals will not have a material impact at the Cycle Route 72 / Preston Street junction.
- 8.16 The proposed site access would operate with significant spare capacity in the 2028 With Development scenario, showing it is fit for purpose.
- 8.17 An *Interim Travel Plan* has also been prepared which sets out measures to encourage sustainable travel patterns and reduce the reliance on private car use.
- 8.18 The Transport Assessment demonstrates that the traffic associated with the development proposals can be accommodated on surrounding highway network without having a severe impact in accordance with the NPPF.
- 8.19 In summary, it has been demonstrated that the proposed development will accord with Policy T1 and Emerging Policies CO4PU and DM22 and, more generally, the transportation and access policies of the NPPF. There are no overriding traffic and transportation reasons preventing the local highway authority from recognising that the proposals are acceptable nor why planning permission could not be granted.

## Design and Built Environment

- 8.20 Policy DM10: Achieving Quality of Place sets out the Council's expectation for a high standard of design and the fostering of 'quality places', through a number of measures, including responding positively to the character of a site and wider setting; incorporating existing features of interest including landscape, topography, local vernacular styles and building materials; and creating and maintaining reasonable standards of general amenity.



- 8.21 Policy DM11: Sustainable Development Standards sets out the Council's ambition that development proposals reach high standards of sustainability, through requirements such as: high energy efficiency standards in relation to the Code for Sustainable Homes and BREEAM; buildings to maximise solar gain; construction materials to be sourced, where possible, from local and sustainable sources of production; and surface water is managed appropriately and inclusion of SuDS where possible.
- 8.22 Policy DS6PU: Design and Development Standards sets out the Council's expectation for new development to meet high-quality standards of design, including measures such as: creation and enhancement of locally distinctive places sympathetic to surrounding context; use good quality building materials that reflects local character and vernacular, sourced locally where possible; support good health and well-being by incorporating high quality, inclusive and useful open spaces and providing high levels of residential amenity; create layouts that encourage walking and cycling; provision of safe and accessible pedestrian routes; create opportunities that encourage social interaction; be of flexible and adaptable design; maximise solar gain; and address land contamination and land stability.
- 8.23 In response to these requirements, a detailed assessment of the design characteristics and benefits of the scheme is provided in the accompanying *Design and Access Statement*.
- 8.24 In terms of its design, the proposed foodstore is broadly rectangular in shape and promotes a clean, contemporary approach utilising extensive glazing on its northern elevation and parts of the western elevation. The building, flat-roofed in nature, will benefit from a feature glazed entrance façade facing west and will also incorporate a striking anthracite grey fascia canopy providing shelter for customers. The building's vertical cladding provides a contemporary aesthetic which combines well with the modern form, with glazing to the store's northern and western elevations adds transparency and lightness to the facades.
- 8.25 The extensive use of glazing on the foodstore's most prominent elevation will offer views into the sales area for passers-by along Preston Street, adding interest and creating an inviting active frontage to the scheme. Glazing will also provide an expansive customer entrance and allow natural light to permeate throughout the store, thus reducing lighting requirements and creating a more pleasurable shopping experience.
- 8.26 With regards to scale and massing, the proposed foodstore would be broadly one-storey in height. This means that the building will be of a similar height to existing surrounding buildings. Due to the change in levels between the site and surrounding development, the proposed building will be a much lower height than the residential properties to the south west of the site. Accordingly, the scale and massing of the proposed foodstore will be appropriate for its context.
- 8.27 The proposed scheme also takes into account the needs of crime and safety. For example, the customer entrance has a high degree of glazing which will offer unobstructed views into and out of the building and provide good natural surveillance. Customer cycle stands are located in front of the northern elevation where good natural surveillance is available from both the building and car park. Finally, the surface car park and external public spaces are generally open and provide good uninterrupted sight lines with clearly defined through routes and circulation. Overall, design measures have been incorporated into the scheme to limit the opportunities for crime, and to reduce the risk of crime, disorder and disturbance occurring.
- 8.28 Overall, it has been demonstrated that the design of the proposed foodstore will be of a high-quality modern standard and sympathetic to the scale, form and character of existing surrounding structures. The design philosophy adopted, drawing upon a simple palette of contemporary materials, will ensure that the proposed development does not appear out of place in the context of surrounding land uses. Further, it has been shown that the development will improve the character of



the Site and bring new life along this stretch of Preston Street. Finally, design measures have been incorporated into the scheme to limit opportunities for crime. Compliance can therefore be demonstrated with Policies DM10 and DM11 of the Local Plan and emerging Policy DS6PU of the emerging Local Plan and design policies of relevance contained in the NPPF.

## Residential Amenity, Noise and Air Quality

- 8.29 The NPPF states “planning policies and decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.”
- 8.30 Policy DS11PU: Protecting Air Quality states development proposals will only be granted planning permission where they will not give rise to unacceptable levels of air pollution.
- 8.31 A baseline noise survey was undertaken in August 2023. The survey, and subsequent assessment work, have been undertaken in accordance with current standards and guidance. The Noise Assessment considers noise from the proposed plant, car park and deliveries; with calculations performed using noise modelling software, and the results interpreted in accordance with relevant standards. Assessments have found that, with the provision of acoustic fencing around the plant area to the south east of the store and between the car park and the residential development to south west of the site, as is proposed, noise impact is expected to reside at or below the LOAEL in accordance with the relevant guidance.
- 8.32 The *Air Quality Assessment*, undertaken in accordance with IAQM Guidance for the construction phase of the proposed development, concludes there is potential for dust soiling effects associated with fugitive emissions from the Site. Assuming good practice control measures are implemented, the residual effect associated with dust soiling during the Construction Phase is deemed to be not significant. It is concluded that relevant mitigations implemented as part of a conditioned Construction Management Plan would be sufficient in mitigating any perceived impact.
- 8.33 An assessment was also undertaken in accordance with IAQM Guidance to determine the impact from development generated traffic on the local road network. Impacts on NO<sub>2</sub> and PM<sub>10</sub> concentrations at the worst case existing sensitive receptors, closest in proximity to roads affected by the highest development flows, were predicted to be not significant in accordance with IAQM guidance.
- 8.34 It is therefore considered unlikely that noise nor air quality be a determining factor in the granting of planning approval for the proposed development, subject to submission of an acceptable Construction Management Plan to the Council following the grant of planning permission and prior to commencement of works on-site. Compliance can consequently be demonstrated with Policy DS11PU and relevant parts of the NPPF.

## Biodiversity and Ecology

- 8.35 Emerging Strategic Policy N1PU: Conserving and Enhancing Biodiversity and Geodiversity outlined the Council's commitment to conserving the borough's biodiversity and geodiversity including protected species and habitats.
- 8.36 A *Preliminary Ecological Appraisal* has been prepared in support of the planning application by Total Ecology, accompanied by a *Biodiversity Net Gain Assessment*. The *Ecological Appraisal* identifies three main habitat land categories on site, roughly split into an artificially unsealed car park to the north and willow scrub to the south. A small area of woodland is present to the east.



- 8.37 The site has potential to support roosting, foraging, and nesting birds, including amber and red-listed species. Bats may likely commute through site, although no roosting opportunities are available. Small mammals including hedgehogs may utilise the site for cover and foraging and it is possible that common invertebrates will make use of clearings and vegetation within the willow scrub. It is considered that this could be replaced elsewhere locally if breeding bird surveys reveal this is the case.
- 8.38 The Appraisal recommends works take place outside of the main nesting bird season (March – August inclusive). Should it be necessary for works to be carried out during this period, then a site visit by an appropriately qualified ecologist will be necessary to ensure no nesting birds will be impacted by works.
- 8.39 Other mitigation is proposed including methods for the protection of hedgehogs during maintenance and safe storage of harmful materials.
- 8.40 The proposed created grassland on site should include species such as fine grasses including fescues, bents, and meadow-grasses, bird's-foot trefoil, and kidney vetch which are food plants for invertebrates recorded within the local area.
- 8.41 In conclusion, based on the supporting *Ecological Appraisal*, it is clear that the Site is of generally low ecological significance. Notwithstanding this, a range of mitigation measures have been proposed by the submission which will actively seek to protect those animals that currently use the Site. Accordingly, there is no potential for conflict with nature conservation policies within the Local Plan or those policies of relevance contained within the NPPF.

## Arboriculture and Trees

- 8.42 Policy DM28: Protection of Trees requires an arboricultural assessment as to whether any trees are worthy of retention and protection and stipulates that any trees removed are replaced, where possible, at a minimum ratio of 2:1.
- 8.43 The accompanying *Arboricultural Impact Assessment* and *Arboricultural Method Statement* prepared by AllAboutTrees provides an overview of ALDI's approach to existing trees within and adjacent to the Application Site boundary.
- 8.44 These reports confirm that the Site is not within a Conservation Area and there are no Tree Protection Orders imposed on any trees within the Site. A site visit was undertaken on 1 September 2023 and all trees onsite surveyed and categorised. 9no. individual trees were identified and 6no. groups. 5no. trees were classed as moderate (b) quality and 4no. classed as low (c) quality. All groups were considered low (c) quality. Wherever possible, trees will be retained. However, where trees conflict with the siting of the store or car park and supporting infrastructure for the store's operation, trees will have to be removed.
- 8.45 During construction, retained trees will benefit from protective barriers with signs erected to their perimeter highlighting these as protective zones not to be entered in preserving their current condition. The details of relevant protection works are outlined within the accompanying Method Statement and plans.
- 8.46 In total, more than 10 new trees will be introduced to the Site as part of the application proposals to replace those lost due to the construction of the new store. The constraints of the site and requirements to accommodate the proposed development dictate that the number of replacement trees may not achieve the desired 2:1 ratio. However, trees of significance are to be retained and protected throughout the construction period and replacement trees will be of a higher quality than



those lost, which are almost exclusively considered low quality. It is therefore concluded that the proposals align with the aims of Policy DM28.

## Flood Risk and Drainage

- 8.47 Policy DM24: Development Proposals and Flood Risk requires a Flood Risk Assessment (FRA) to be submitted as part of the planning application where a proposed development is likely to be at risk from flooding or increases risk of flooding elsewhere.
- 8.48 Policy DS9PU: Sustainable Drainage seeks that new development incorporates sustainable drainage systems where appropriate.
- 8.49 Strategic Policy DS8PU: Reducing Flood Risk seeks to ensure that development in the borough is not prejudiced by flood risk through a range of measures.
- 8.50 This application is supported by a *Flood Risk and Surface Water Drainage Assessment*, prepared by Hydrock. The assessment has been undertaken in accordance with national and local guidance and consultation has taken place with the Environment Agency and LLFA.
- 8.51 The report explains that the Site falls wholly within Flood Zone 1 (lowest risk of flooding). The proposed drainage system has been designed to accommodate a 1 in 100 year +45% climate change storm event. Attenuation will be provided within the site in the form of underground cellular storage tank.
- 8.52 In terms of the Site's surface water drainage, the proposals will not exacerbate flooding elsewhere. The proposed surface water drainage system will be restricted to a maximum discharge of 6.1 l/s into the culvert watercourse (Pow Beck), to the eastern boundary of the site.
- 8.53 SuDs options have been considered for the site will be in the form of Filter Drains and an underground proprietary SPEL ESR unit will be utilised in the drainage system to provide treatment of surface water flows prior to discharge to the Pow Beck.
- 8.54 Foul water flows will discharge into the existing combined 800x600 brick egg sewer, located to the east of the proposed building.
- 8.55 The *Flood Risk Assessment* concludes that, with careful design of the drainage elements as described above, there will be no residual flood related risks remaining after the development has been completed. As the proposed development will reduce flow rates and not lead to any adverse impacts, it is considered compliant with the NPPF and relevant flood risk policies of the Local Plan as described above.

## Ground Conditions

- 8.56 The accompanying *Phase II Geo-Environmental Appraisal and Coal Mining Risk Assessment* provides an overview of the current ground condition of the Site. Following a *Phase I Desktop Study*, supplementary ground investigation works were undertaken to further assess potential geotechnical constraints identified during the initial phase of works and to aid in future foundation design. Supplementary investigation works were undertaken in January 2023 comprising of 3no. mini-percussive boreholes. 6no. rotary open-hole boreholes and contamination related testing.
- 8.57 No concentrations of potential site-contaminants were identified as exceeding current assessment criteria, based upon a commercial end-use. Materials present at the Site are considered suitable for continued use within a commercial setting without representing a potential risk to human health. In addition, when considering very-low levels of potential contaminants recorded beneath the Site, no



significant risk was considered to controlled waters (i.e. underlying aquifers and surface water features).

- 8.58 From the findings of the rotary investigation works an intact and banded coal seam has been identified below the site from depths of between 18.50m and 25.90m (4.00m to 14.8m below rock-head level), ranging in thickness between 2.00m to 3.20m, which is considered to be attributable to the Bannock Band coal seam.
- 8.59 Therefore, as a precautionary measure it is recommended that an allowance be included for localised probing and grouting (if required) across to building footprint on a typical minimum 6m centre grid to more accurately assess the level of risk in this regard. Should workings be encountered an allowance should then be included for remedial works in the form of grouting to mitigate the risk to the development.
- 8.60 The report identifies some mitigation and considerations, that if complied with, should provide no risk in terms of ground conditions, contaminated land and historic coal mining. The proposals should therefore be considered to be in compliance with the relevant criteria outlined within in the Local Plan with regards to land contamination and instability.

## **Sustainability, Environmental Standards & Renewable Energy**

- 8.61 The accompanying *Sustainability Statement* prepared by Projekt Architects, KLR, CAD21, Wave and 3E provides an overview of ALDI's approach to sustainability. The Statement sets out that the development will seek to minimise energy use, minimise waste and use sustainable building materials.
- 8.62 This Statement assesses the proposed development against relevant climate change and sustainability policies and targets, as outlined within Policy BH2 of the *Sunderland City Council Core Strategy* (2020), through the following of the energy hierarchy, and addressing all aspects of a sustainable development – including transport, maximising energy efficiencies and limiting carbon emissions throughout the lifetime of the new ALDI store.
- 8.63 As part of this process, the development is to be designed with a fabric first approach. High efficiency air source heat pumps are proposed to meet the heating and cooling demands of the development, alongside LED lighting with absence/presence control to minimise the electrical energy demand of the development. Photovoltaic panelling is also provided to the roof of the store to assist in meeting future energy demands. This approach demonstrates a holistic low energy design concept, resulting in low carbon emissions and demand throughout the lifetime of the development.
- 8.64 In addition to the following of the energy hierarchy through the efficient design and renewable technology measures mentioned and meeting all relevant Sunderland City Council carbon targets, the proposal will include many sustainability measures throughout construction and once completed, which will contribute significantly to the development's sustainability performance and accord with the requirements of the NPPF. The key measures to be included are outlined in the accompanying *Sustainability Statement*.
- 8.65 Based on the various sustainability measures proposed as part of the ALDI foodstore, the sustainable design and energy strategy demonstrates that the development will comply with local planning policy requirements concerning environmental standards and is also in-line with relevant national guidance. Accordingly, no conflict is anticipated with the relevant parts of local and national planning policy concerning sustainable design and development.



## Security and Designing-out-Crime

- 8.66 The proposed discount foodstore has been designed with safety and crime prevention in mind. A number of physical security measures are proposed to reduce the opportunity for and perception of crime. This includes:
- Good natural surveillance across the car park;
  - Cycle parking located in a location with good visibility;
  - Well-maintained planting and vegetation; and,
  - CCTV and alarm systems.
- 8.67 As the development will comply with the requirements of Cumbria Police in terms of safety and security, it is considered to accord fully with the relevant Local Plan policies concerning safety and security.

## Summary

- 8.68 This section has clearly demonstrated that the proposals meet the requirements of the policies contained within the adopted and emerging planning framework relating to economic growth, noise, layout and design, transportation, flood risk, ecology, air quality, security, renewable energy and sustainability; as well as the relevant, corresponding policies contained within the NPPF.
- 8.69 The above analysis, when considered alongside separate qualitative justifications for the sequential test and retail impact test, demonstrate the development is acceptable in planning policy terms.



## 9. Summary and Conclusions

### Overview

- 9.1 This *Planning and Retail Statement* has been prepared on behalf of ALDI Stores Limited, in support of a 'full' planning application which seeks permission for the erection of a 'Use Class E' discount foodstore with new vehicular access and egress to Preston Street, new internal vehicular access roads, car parking, cycle parking, servicing area, and associated hard and soft landscaping, with associated works.
- 9.2 The scheme will enhance consumer choice and by meeting day-to-day food retail needs on a localised basis will give rise to considerable benefits in terms of promoting social inclusion and facilitating sustainable travel patterns. It will also provide a local, affordable discount foodstore, in an area that suffers from varying levels of deprivation.
- 9.3 Added to this, it is important to acknowledge that the foodstore will contribute a range of good quality, flexible retail positions which are within walking distance from the surrounding residential area. A discount foodstore of the scale proposed would typically employ 40 to 50 members of staff.
- 9.4 Finally, the scheme is eminently deliverable, with ALDI targeting construction within 18-months of obtaining planning permission. The overall investment value of the development will be approx. £5 million with wider benefits to the local community.

### Policy Compliance

- 9.5 This *Planning and Retail Statement* has considered the application proposals against the relevant policies contained within Copeland's (Cumberland's) adopted and emerging Development Plan, as well as other material considerations including national planning policy guidance. Specific consideration has been given to the sequential and retail impact tests of the development plan, which are considered to be the '*main planning issues*' in this case.
- 9.6 It has been demonstrated that the Council believe the Site suitable for the proposed use. Although, as a retail use, the sequentially preferred location for such a development would be within the designated town centre boundary for Whitehaven, the applicant has demonstrated that no such site is available, suitable or viable. As the application site is both an edge-of-centre site and is identified as an 'opportunity site', the site would represent the next sequentially suitable site for retail development and should therefore be considered acceptable in principle.
- 9.7 The Applicants' conclusions are summarised in relation to each of these key matters below:

### Sequential Test

- 9.8 The Sequential Assessment set out in Section 6 (and in greater detail at **Appendix 6** of this report) has demonstrated there are no sequentially preferable development sites within or on the edge of Whitehaven Town Centre.

### Retail Impact

- 9.9 Section 7 of this report has demonstrated that the trading effects of the retail proposals, together with reoccupation of the existing ALDI store by a new foodstore operator (should this transpire at any future point), will not give rise to any adverse retail impacts on designated centres within the primary catchment area, namely Whitehaven Town Centre.



## Other Planning Policy Matters

- 9.10 Section 9 of this Statement has clearly demonstrated that the proposals meet the requirements of the policies contained within the adopted and emerging Local Plan and its' supporting documentation; relating to economic growth, noise, layout and design, transportation, flood risk, ecology, air quality, renewable energy and sustainability - as well as relevant, corresponding policies contained within the NPPF. This analysis, when considered alongside separate qualitative justifications for the sequential test and retail impact test, demonstrate the development is acceptable in planning policy terms.

## Overview, Benefits and Planning Balance

- 9.11 The NPPF is clear that development proposals which accord with an up-to-date development plan should be approved 'without delay'. This *Planning and Retail Statement* has demonstrated that the application proposals are **compliant with the adopted Copeland Local Plan and permission should therefore be granted.**
- 9.12 Notwithstanding this robust conclusion, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that planning applications are determined in accordance with the development plan **unless material considerations indicate otherwise.** Accordingly, even if the Local Planning Authority considers that the scheme would technically fail to comply with any specific development plan policy, consideration must also be given to other material planning considerations and whether these outweigh the local policy conflict identified.
- 9.13 This Statement has identified several **very positive impacts that will result from the proposed development, should permission be granted.** It is appropriate to weigh these material considerations in the planning balance as part of the determination of this application. The positive impacts can be summarised as follows:
- The relocation of the existing ALDI discount foodstore will play an important role in further enhancing consumer choice and competition within Whitehaven's food retailing sector by expanding the footprint of the ALDI store and providing an opportunity for another food retailer to operate in the area;
  - Meeting day-to-day food retail needs on a more localised basis will give rise to considerable benefits in terms of promoting social inclusion and facilitating sustainable travel patterns;
  - As the proposals are located within an area that suffers from high levels of deprivation, which are between the 10- 40% of the most deprived neighbourhoods in England, the proposals can offer high quality and affordable goods where they can greatly benefit the local community;
  - There is strong support within the local community for a local ALDI foodstore, as evidenced by the findings in the accompanying Statement of Community Involvement;
  - ALDI will create additional full and part-time jobs - delivering further indirect jobs through services supporting the new foodstore, and also providing a range of temporary construction jobs. The vast majority of positions will be made available to local people via targeted work with organisations such as Job Centre Plus;
  - The proposal offers the guarantee of deliverable economic development by a national retailer which will help boost the local economy and will assist in attracting further investment. Indeed, the overall economic value of ALDI's investment alone is anticipated to be £5m;
  - Finally, ALDI's introduction will offer sustainability benefits, including the provision of four car parking spaces that are equipped with Electric Vehicle Charging Points ('EVCP').



- 9.14 Overall, it has been demonstrated that the proposed foodstore development accords with the key policies of the Development Plan, as well as the relevant policy tests contained within the NPPF. The Applicants' position is therefore that planning permission should be granted on this basis.
- 9.15 Notwithstanding this, it has been highlighted above that the application proposals will deliver some very significant positive benefits which weigh heavily in favour of the scheme. It is considered that these benefits demonstrably outweigh any minor perceived negative impacts or policy conflicts that the Local Planning Authority may consider arise as a consequence of the foodstore development.
- 9.16 The application proposals are therefore acceptable in planning terms, and it is respectfully requested that planning permission be granted.



# Appendix I

## Location Plan





REV	DATE	DESCRIPTION	DRW	CHK
P01	2023-10-18	First issue	Adel	MJ

Client  
**Aldi Stores Ltd.**



Project Title  
**Aldi - Whitehaven**

Project Address  
**Preston Street  
Whitehaven**

Drawing Title  
**Location Plan**

Job No.	Originator	Zone	Level	Type	Role
<b>0470</b>	<b>PA</b>	<b>XX</b>	<b>00</b>	<b>DR</b>	<b>A</b>

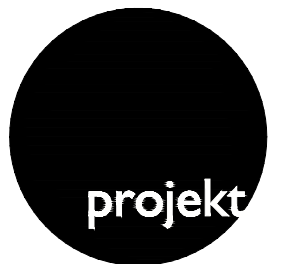
System Classification	Drawing No.	Suitability	Revision
<b>PM_40_50-21-0001</b>		<b>S4</b>	<b>P01</b>

Drawn	Checked	Date	Scale	Size
<b>Adel</b>	<b>MJ</b>	<b>2023-10-12</b>	<b>1:1000</b>	<b>A3</b>

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# Appendix II

## Retail Study Area Plan





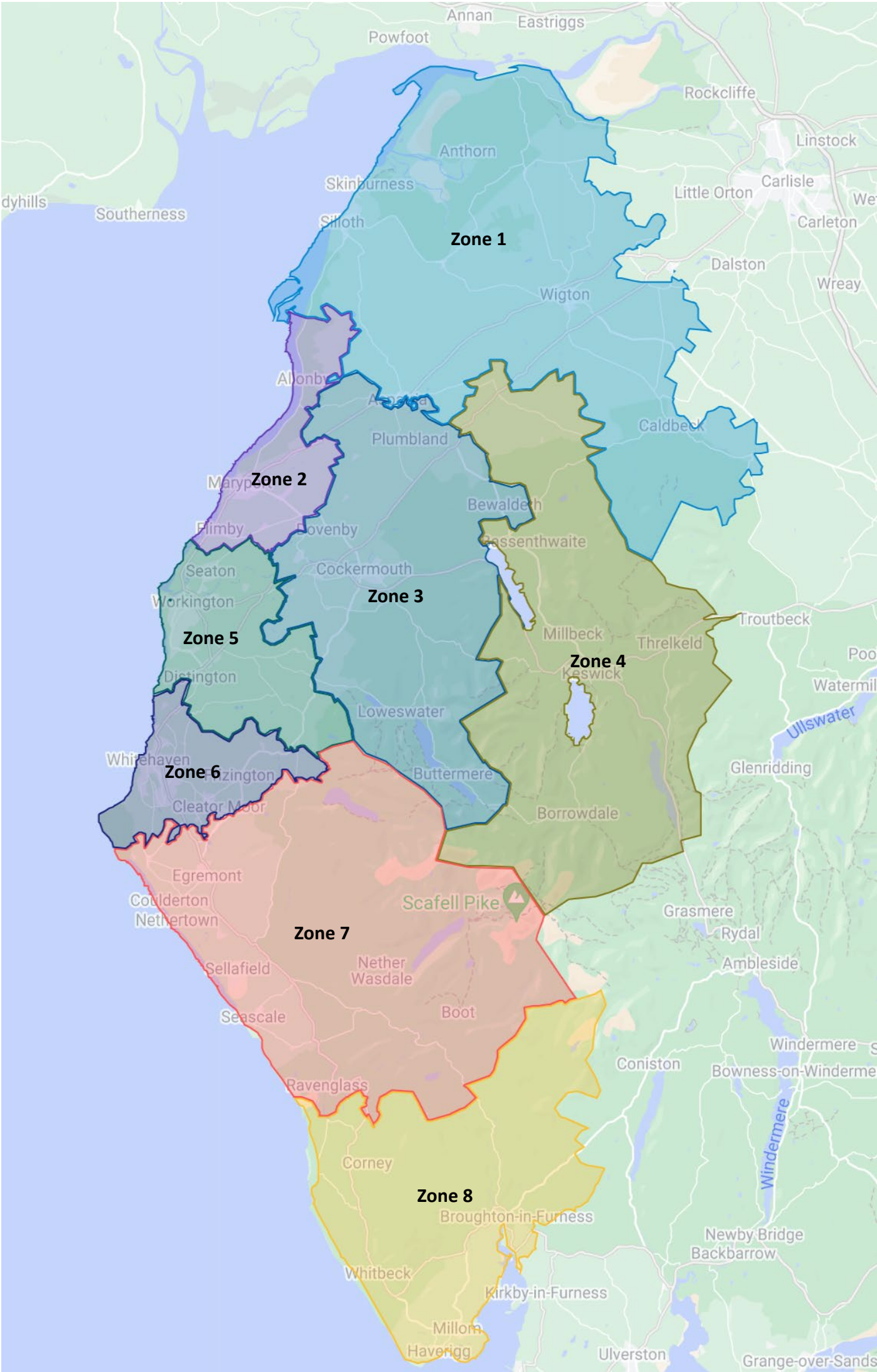
# Proposed Aldi Foodstore – Land at Preston Street, Whitehaven

## Appendix 2 – Study Area Plan by zone

AVISON  
YOUNG

**Postcode Sectors**

- Zone 1** - CA7 0, 3, 4, 5, 8, 9
- Zone 2** - CA15 6, 7, 8
- Zone 3** - CA13 0, 9 and CA7 2
- Zone 4** - CA12 4, 5 and CA7 1
- Zone 5** - CA14 1, 2, 3, 4, 5
- Zone 6** - CA24 3, CA25 5, CA26 3, CA28 6, 7, 8, 9
- Zone 7** - CA19 1, CA20 1, CA21 2, CA22 2, CA23 3 and CA27 0
- Zone 8** - LA18 4, LA18 5, LA19 5 and LA20 6





## Appendix III

Zone 6 from Retail Study Area Plan with Primary Catchment Area for proposed ALDI





# Proposed Aldi Foodstore – Land at Preston Street, Whitehaven

Appendix 3 – Zone 6 from Retail Study Area Plan with Primary Catchment Area for proposed ALDI

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## Key



### Proposed Aldi Foodstore

Land at Preston Street, Whitehaven



### Zone 6

(Postcodes of CA24 3, CA25 5, CA26 3, CA28 6, 7, 8, 9)



Primary catchment - 7 Minute drivetime





## Appendix IV

### Whitehaven Town Centre and existing foodstores





# Proposed Aldi Foodstore – Land at Preston Street, Whitehaven

Appendix 4 – Whitehaven Town Centre and Existing Foodstores within Primary Catchment

AVISON  
YOUNG

## Key



**Proposed Aldi Foodstore**

Land at Preston Street, Whitehaven



**Primary Catchment - 7 Minute drivetime**



**Whitehaven Town Centre Boundary**

## Retailers



Asda



Aldi



Heron Foods



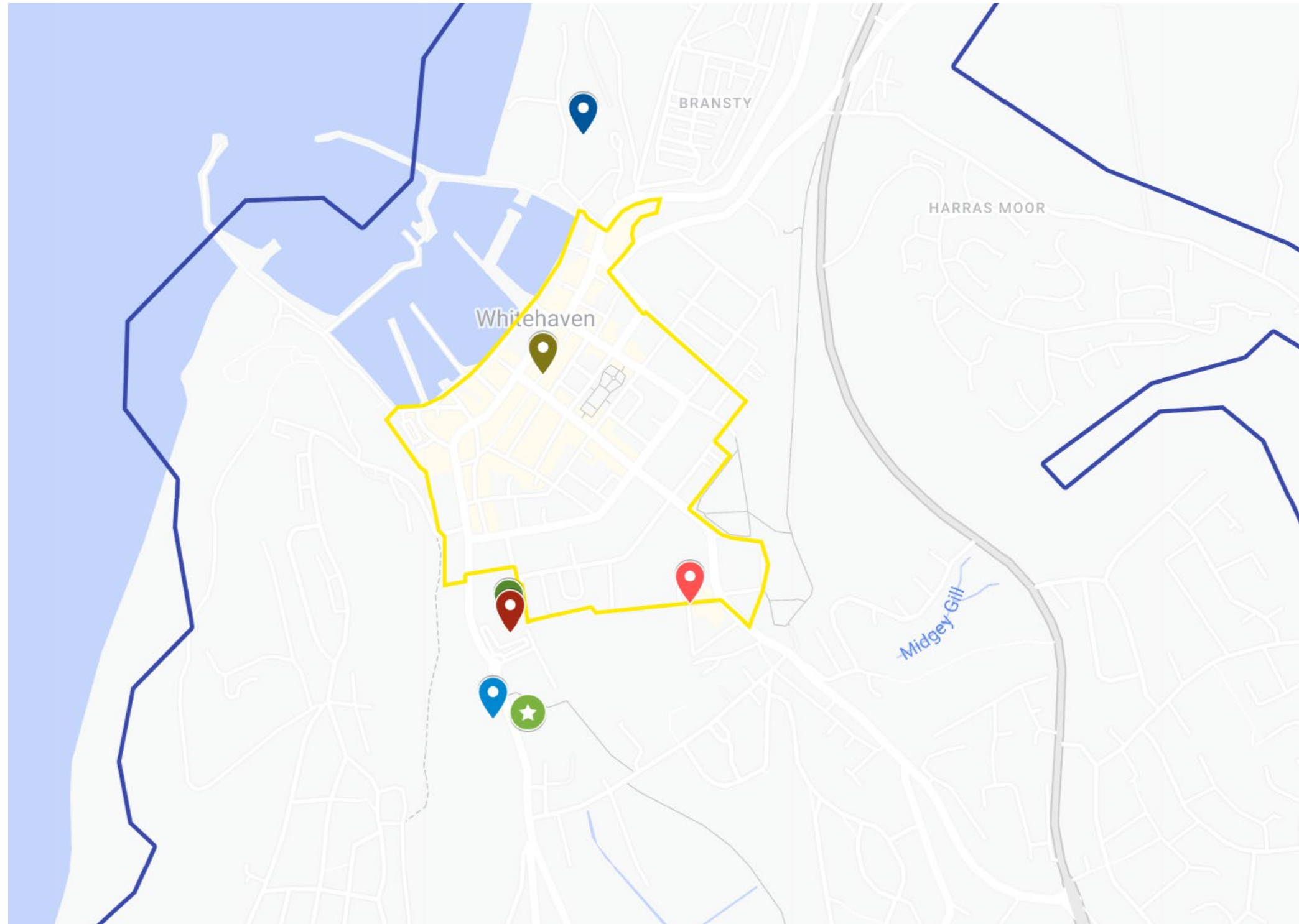
Iceland



Morrisons



Tesco





# Appendix V

## Sequential Assessment Site Plan





# Proposed Aldi Foodstore - Land at Preston Street, Whitehaven

## Appendix 5 - Sequential Assessment Site Plan

AVISON  
YOUNG

### Key



#### Proposed Aldi Foodstore

Land at Preston Street, Whitehaven



#### Whitehaven Town Centre boundary





# Appendix VI

## Sequential Assessment Site Proformas



## Appendix 6 - Sequential Assessment – Detailed Proformas

### Site 1 – Preston Street garage, Whitehaven

#### Satellite Image

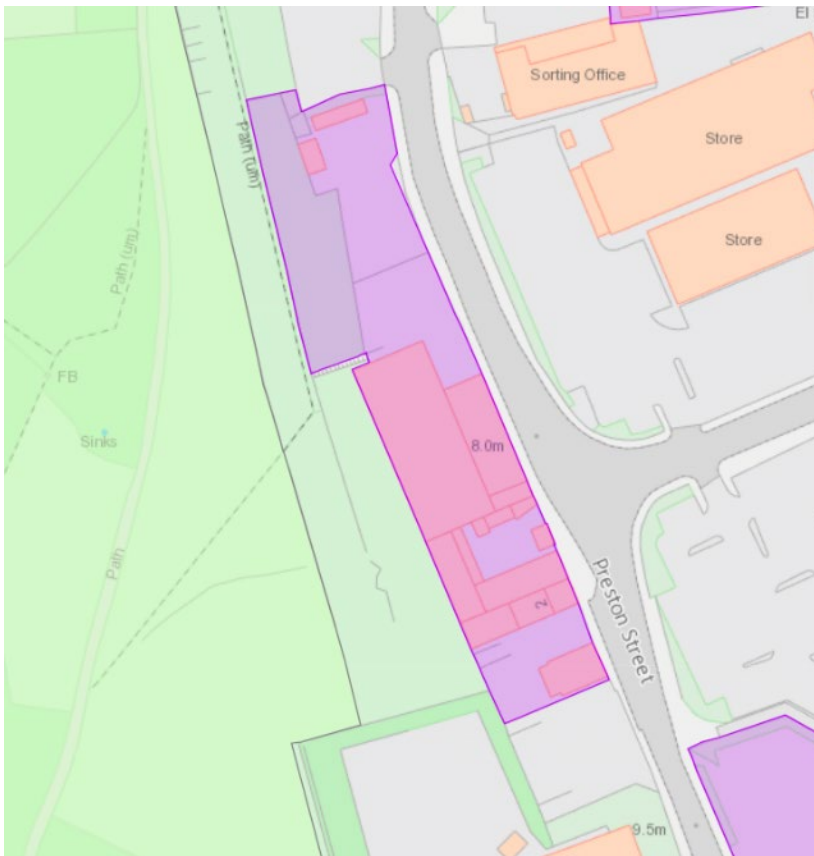


#### Site Photo

Existing site – looking  
west from Preston  
Street





<b>Site Size</b>	The site extends to 0.45 hectares.
<b>Existing Uses</b>	The site is currently occupied by a mix of commercial uses. It also includes vacant property.
<b>Neighbouring Uses</b>	The site lies just beyond the southern edge of Whitehaven town centre. Surrounding uses are predominantly commercial in nature, including a mix of retail, motor sales and business uses.
<b>Relationship with Nearest Centre</b>	The nearest part of the site is 70 metres from Whitehaven town centre. As such, the site represents an ' <i>edge of centre</i> ' opportunity in sequential policy terms.
<b>Development Plan Allocation</b>	<p>The adopted local plan allocates the site as an 'Employment Opportunity Site' under policy EMP 3 and with reference 'WEOS3'.</p> <p>Allocation of the site for development has been carried forward into the emerging local plan.</p> 
<b>Planning Permissions / Current Development Proposals</b>	Various applications have been granted associated with the commercial land uses present on site.
<b>Suitability</b>	<p>At 0.45 hectares, the site is not of a sufficient size to accommodate the scale and form of the development proposed, even if an appropriate level of flexibility was applied.</p> <p>The site occupies an edge of centre location, similar to that proposed by ALDI. It is therefore no more suitable, in sequential terms, than the application site.</p>

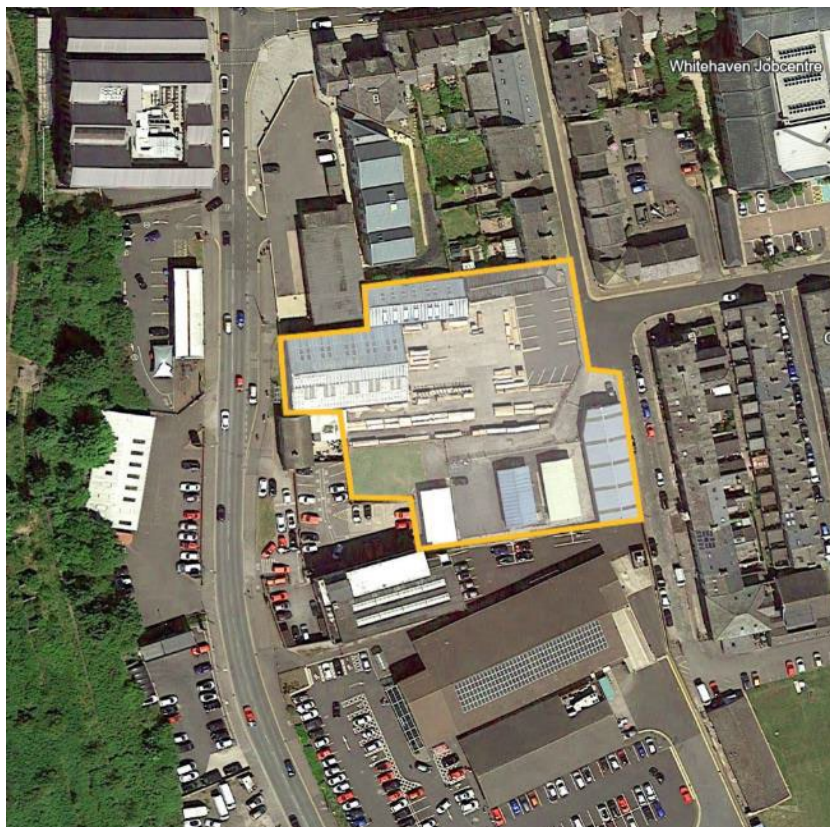


	This site must therefore be dismissed as ' <i>unsuitable</i> ' on this basis.
<b>Availability</b>	Most of the site is in active use. The site was not being marketed at the time of inspection. Beyond this, its availability is unknown.
<b>Conclusions</b>	In conclusion, the site is not ' <i>suitable</i> ' and it may also not be ' <i>available</i> '.



## Site 2 – Jacksons Timber Yard, Whitehaven

### Satellite Image



### Site Photo

Existing site – looking west from Howgill Street



### Site Size

The site extends to 0.47 hectares.

### Existing Uses

The site is currently occupied by commercial uses and the Whitehaven Air Cadets.

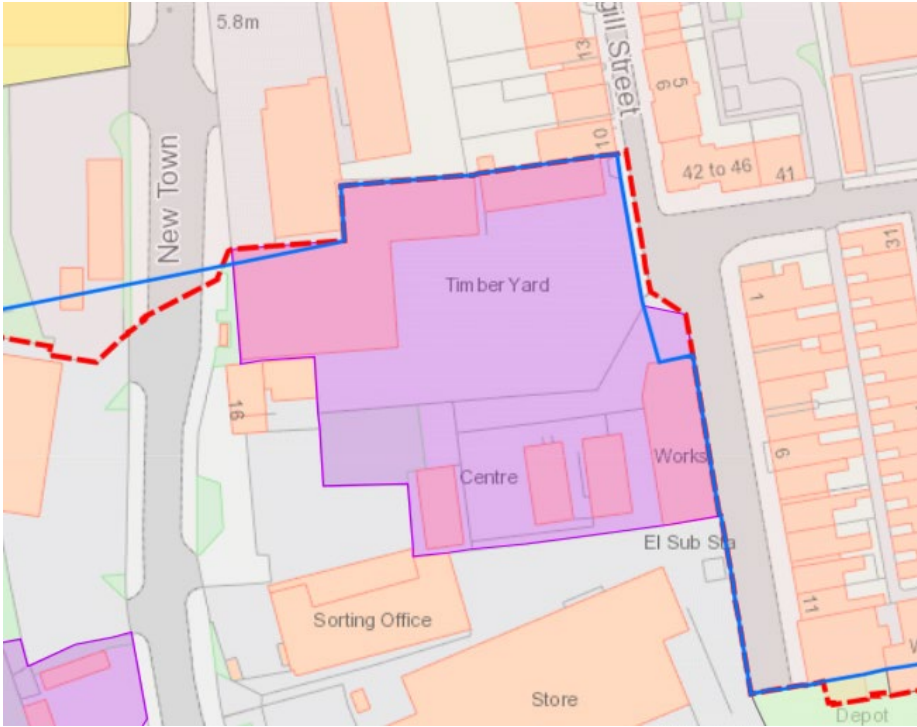
### Neighbouring Uses

The site lies just beyond the southern edge of Whitehaven town centre. Surrounding uses are a mix of commercial and residential.

### Relationship with Nearest Centre

The northern and eastern part of the site shares a boundary with Whitehaven town centre. As such, the site represents an '*edge of centre*' opportunity in sequential policy terms.



<b>Development Plan Allocation</b>	<p>The adopted local plan allocates the site as an 'Employment Opportunity Site' under policy EMP 3 and with reference 'WEOS2'.</p> <p>Allocation of the site for development has been carried forward into the emerging local plan.</p> 
<b>Planning Permissions / Current Development Proposals</b>	<p>Various applications have been granted associated with the commercial land uses present on site.</p>
<b>Suitability</b>	<p>At 0.47 hectares, the site is not of a sufficient size to accommodate the scale and form of the development proposed, even if an appropriate level of flexibility was applied.</p> <p>The site occupies an edge of centre location, similar to that proposed by ALDI. It is therefore no more suitable, in sequential terms, than the application site.</p> <p>This site must therefore be dismissed as '<i>unsuitable</i>' on this basis.</p>
<b>Availability</b>	<p>The site is in active use. The site was not being marketed at the time of inspection. Beyond this, its availability is unknown.</p>
<b>Conclusions</b>	<p>In conclusion, the site is not '<i>suitable</i>' and it may also not be '<i>available</i>'.</p>



**Site 3 – Quay Street car park west, Whitehaven****Satellite Image****Site Photo**

Existing site – looking north west from Quay Street

**Site Size**

The site extends to 0.3 hectares.

**Existing Uses**

The site is currently in use as a car park.

**Neighbouring Uses**

The site lies within Whitehaven town centre.  
Surrounding uses are a mix of commercial and residential.

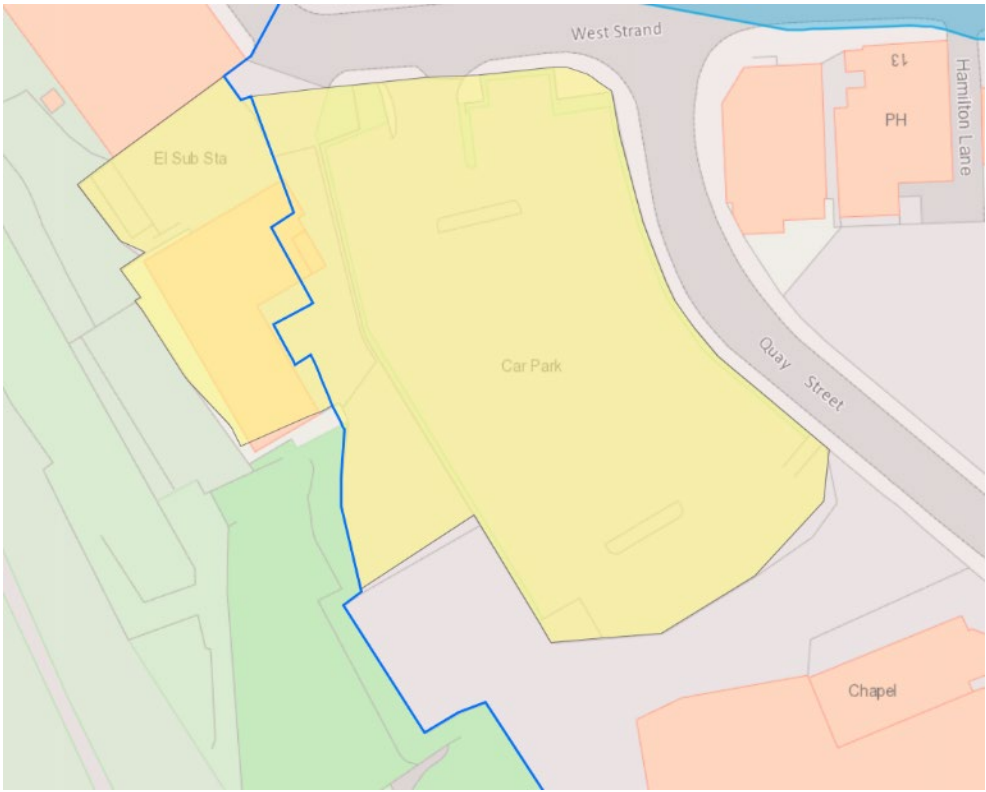
**Relationship with Nearest Centre**

The site is located within Whitehaven town centre.

**Development Plan Allocation**

The adopted local plan allocates the site as a 'Town Centre Development Opportunity Site' under policy TCN 12 and with reference 'WTC1'.  
Allocation of the site for development has been carried forward into the emerging local plan.



	
<b>Planning Permissions / Current Development Proposals</b>	<p>Outline planning consent was granted in 1998 for residential development on the car park part of the site, however this does not appear to have been implemented. Planning permission was granted for apartments on the north western part of the site and this has been implemented.</p>
<b>Suitability</b>	<p>At 0.3 hectares, the site is not of a sufficient size to accommodate the scale and form of the development proposed, even if an appropriate level of flexibility was applied. Furthermore, part of the site has already been developed for housing.</p> <p>This site must therefore be dismissed as '<i>unsuitable</i>' on this basis.</p>
<b>Availability</b>	<p>The site is in active use as a car park. The site was not being marketed at the time of inspection. Beyond this, its availability is unknown.</p>
<b>Conclusions</b>	<p>In conclusion, the site is not '<i>suitable</i>' and it may also not be '<i>available</i>'.</p>



### Site 4 – Quay Street car park east, Whitehaven

#### Satellite Image



#### Site Photo

Existing site – looking east from Quay Street



#### Site Size

The site extends to 0.15 hectares.

#### Existing Uses

The site is currently in use as a car park.

#### Neighbouring Uses

The site lies within Whitehaven town centre.  
Surrounding uses are a mix of commercial and residential.

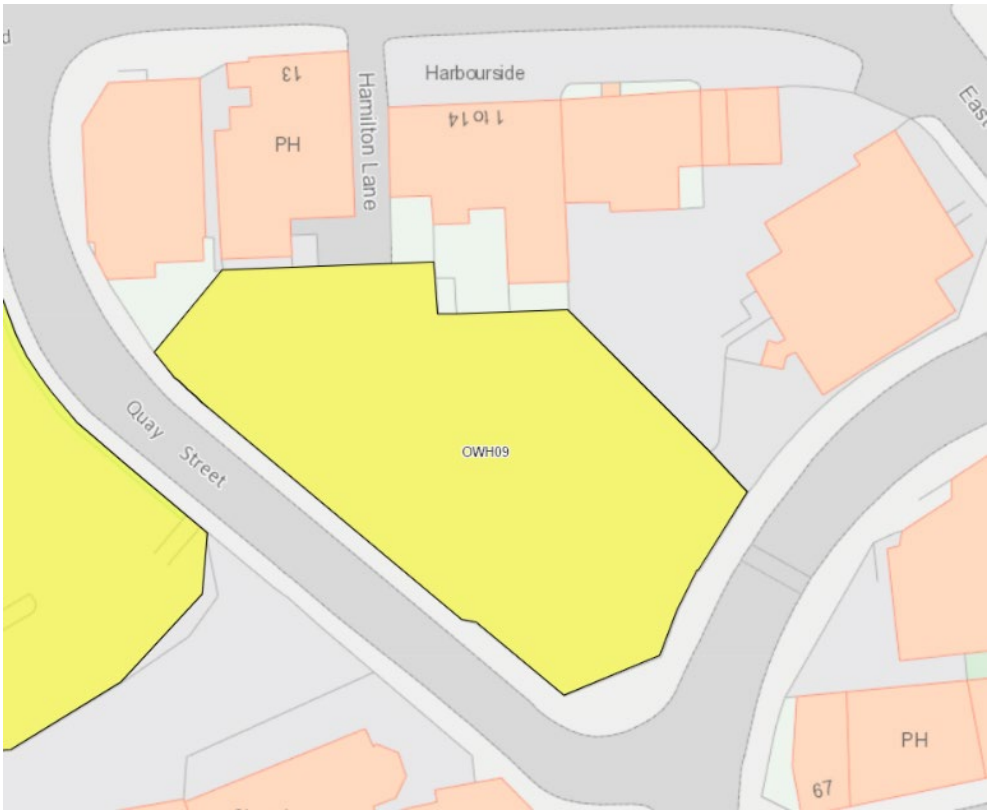
#### Relationship with Nearest Centre

The site is located within Whitehaven town centre.

#### Development Plan Allocation

The emerging local plan allocates the site as an 'Opportunity Site' 'OWH09', suitable for all town centre uses.



	
<b>Planning Permissions / Current Development Proposals</b>	There is no planning history recorded against the site on the Council's portal.
<b>Suitability</b>	<p>At 0.15 hectares, the site is not of a sufficient size to accommodate the scale and form of the development proposed, even if an appropriate level of flexibility was applied.</p> <p>This site must therefore be dismissed as '<i>unsuitable</i>' on this basis.</p>
<b>Availability</b>	The site is in active use as a car park. The site was not being marketed at the time of inspection. Beyond this, its availability is unknown.
<b>Conclusions</b>	In conclusion, the site is not ' <i>suitable</i> ' and it may also not be ' <i>available</i> '.



**Site 5 – Marlborough Street, Whitehaven****Satellite Image****Site Photo**

Existing site – looking east from Quay Street

**Site Size**

The site extends to 0.08 hectares.

**Existing Uses**

The site includes a vacant building that appears to have been used for commercial purposes, together with surface level car parking which is currently being used.

**Neighbouring Uses**

The site lies within Whitehaven town centre.  
Surrounding uses are a mix of commercial and residential.


**Relationship with Nearest Centre**

The site is located within Whitehaven town centre.

**Development Plan Allocation**

The emerging local plan allocates the site as an 'Opportunity Site' 'OWH07', suitable for all town centre uses.



	
<b>Planning Permissions / Current Development Proposals</b>	Outline planning consent was approved in 1998 for a mixed commercial and residential development. This does not appear to have been implemented.
<b>Suitability</b>	<p>At 0.08 hectares, the site is not of a sufficient size to accommodate the scale and form of the development proposed, even if an appropriate level of flexibility was applied.</p> <p>This site must therefore be dismissed as '<i>unsuitable</i>' on this basis.</p>
<b>Availability</b>	The site is partly in active use as a car park. The site was not being marketed at the time of inspection. Beyond this, its availability is unknown.
<b>Conclusions</b>	In conclusion, the site is not ' <i>suitable</i> ' and it may also not be ' <i>available</i> '.



**Site 6 – Mark House & Park Nightclub, Whitehaven****Satellite Image****Site Photo**

Existing site – looking east from Quay Street

**Site Size**

The site extends to 0.25 hectares.

**Existing Uses**

The site is mostly cleared of any buildings, except for a retained building at its northern end and which is vacant. The site is currently being used for car parking.


**Neighbouring Uses**

The site lies within Whitehaven town centre.  
Surrounding uses are a mix of commercial and residential.

**Relationship with Nearest Centre**

The site is located within Whitehaven town centre.



<b>Development Plan Allocation</b>	<p>The adopted local plan allocates the site as a 'Town Centre Development Opportunity Site' under policy 'TCN 12', reference 'WTC2'. Allocation of the site for development has been carried forward into the emerging local plan.</p> 
<b>Planning Permissions / Current Development Proposals</b>	<p>Planning consent was granted in 2011 for a mixed residential and commercial development. Permission has since been granted for the temporary use of the site as a car park.</p>
<b>Suitability</b>	<p>At 0.25 hectares, the site is not of a sufficient size to accommodate the scale and form of the development proposed, even if an appropriate level of flexibility was applied.</p> <p>This site must therefore be dismissed as '<i>unsuitable</i>' on this basis.</p>
<b>Availability</b>	<p>The site is partly in active use as a car park. The site was not being marketed at the time of inspection. Beyond this, its availability is unknown.</p>
<b>Conclusions</b>	<p>In conclusion, the site is not '<i>suitable</i>' and it may also not be '<i>available</i>'.</p>



**Site 7 – Former bus garage, Bransty Row, Whitehaven****Satellite Image****Site Photo**

Existing site – looking east from Quay Street

**Site Size**

The site extends to 0.18 hectares.

**Existing Uses**

The site is vacant.


**Neighbouring Uses**

The site lies within Whitehaven town centre.  
Surrounding uses are a mix of commercial and residential.

**Relationship with Nearest Centre**

The site is located within Whitehaven town centre.



<b>Development Plan Allocation</b>	<p>The adopted local plan allocates the site as a 'Town Centre Development Opportunity Site' under policy 'TCN12', reference 'WTC4'. Allocation of the site for development has been carried forward into the emerging local plan.</p> 
<b>Planning Permissions / Current Development Proposals</b>	<p>Most recently, outline planning consent was granted in 2009 for residential development.</p>
<b>Suitability</b>	<p>At 0.18 hectares, the site is not of a sufficient size to accommodate the scale and form of the development proposed, even if an appropriate level of flexibility was applied.</p> <p>This site must therefore be dismissed as '<i>unsuitable</i>' on this basis.</p>
<b>Availability</b>	<p>The site was not being marketed at the time of inspection. Beyond this, its availability is unknown.</p>
<b>Conclusions</b>	<p>In conclusion, the site is not '<i>suitable</i>' and it may also not be '<i>available</i>'.</p>



## Site 8 – Old Dawnfresh Factory, Whitehaven

### Satellite Image



### Site Photo

Existing site – looking east from Quay Street



### Site Size

The site extends to 0.64 hectares.

### Existing Uses

The site is vacant.

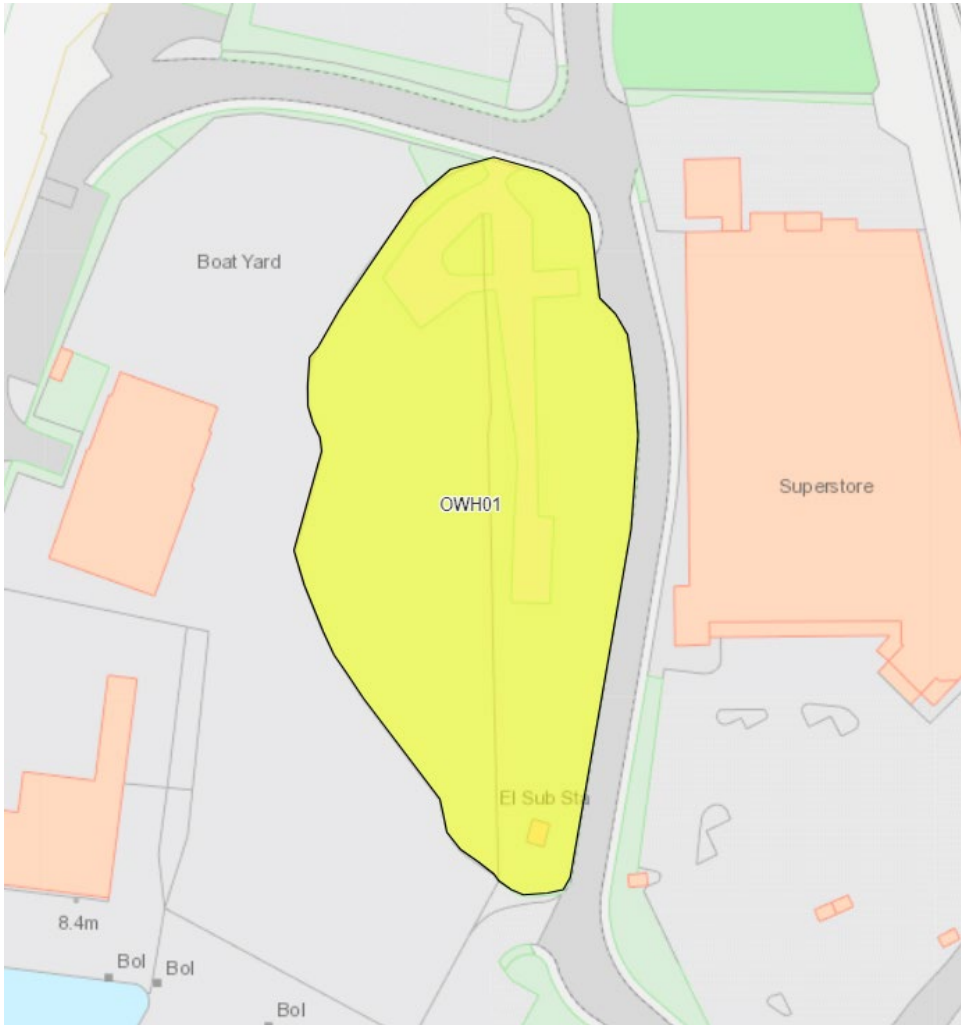
### Neighbouring Uses

Surrounding uses are of a commercial nature.

### Relationship with Nearest Centre

The nearest part of the site is 100 metres from the Whitehaven town centre boundary.

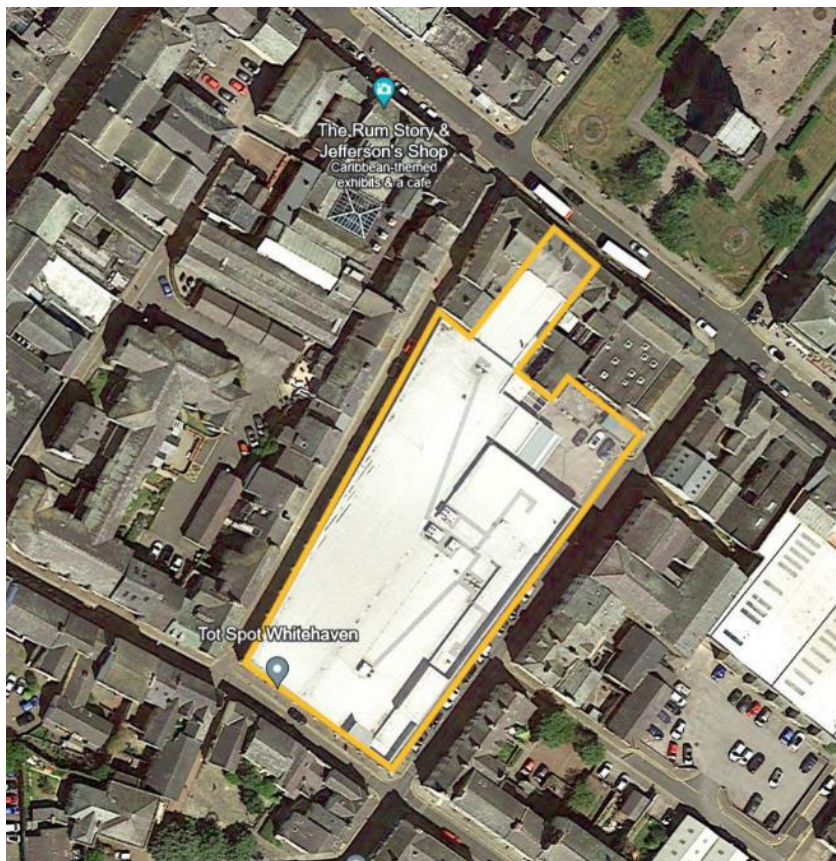


<b>Development Plan Allocation</b>	<p>The emerging local plan allocates the site as an 'Opportunity Site' 'OWH01'. Employment uses are preferred but it is also noted as suitable for all town centre uses.</p> 
<b>Planning Permissions / Current Development Proposals</b>	<p>Most recently, planning consent has been granted for temporary use as a car park.</p>
<b>Suitability</b>	<p>At 0.64 hectares, the site is not of a sufficient size to accommodate the scale and form of the development proposed, even if an appropriate level of flexibility was applied. Furthermore, the configuration of the site does not lend itself to development that would meet ALDI's requirements.</p> <p>The site occupies an edge of centre location, similar to that proposed by ALDI. It is therefore no more suitable, in sequential terms, than the application site.</p> <p>This site must therefore be dismissed as '<i>unsuitable</i>' on this basis.</p>
<b>Availability</b>	<p>A board on site states that the site acquisition has been funded by English Partnerships. Beyond this, its availability is unknown.</p>
<b>Conclusions</b>	<p>In conclusion, the site is not '<i>suitable</i>' and it may also not be '<i>available</i>'.</p>



## Site 9 – Former Wilkinson unit 23-24 Lowther Street, Whitehaven

### Satellite Image



### Site Photo


Existing site – looking south west along Queen Street



### Site Size

The site extends to 0.44 hectares.



<b>Existing Uses</b>	The site is vacant.
<b>Neighbouring Uses</b>	Surrounding uses are of a commercial nature, mostly retail.
<b>Relationship with Nearest Centre</b>	The site is within Whitehaven town centre.
<b>Development Plan Allocation</b>	<p>The site is located within Whitehaven town centre.</p> 
<b>Planning Permissions / Current Development Proposals</b>	Planning history is associated with the former Wilkinson unit, as well as office units at the upper floor levels.
<b>Suitability</b>	<p>At 0.44 hectares, the site is not of a sufficient size to accommodate the scale and form of the development proposed, even if an appropriate level of flexibility was applied.</p> <p>This site must therefore be dismissed as '<i>unsuitable</i>' on this basis.</p>
<b>Availability</b>	The site was not being marketed at the time of inspection. Beyond this, its current availability is unknown.



<b>Conclusions</b>	In conclusion, the site is not ' <i>suitable</i> ' and it may also not be ' <i>available</i> '.
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## Appendix VII

### Whitehaven Town Centre Health Check Assessment



# Whitehaven Town Centre

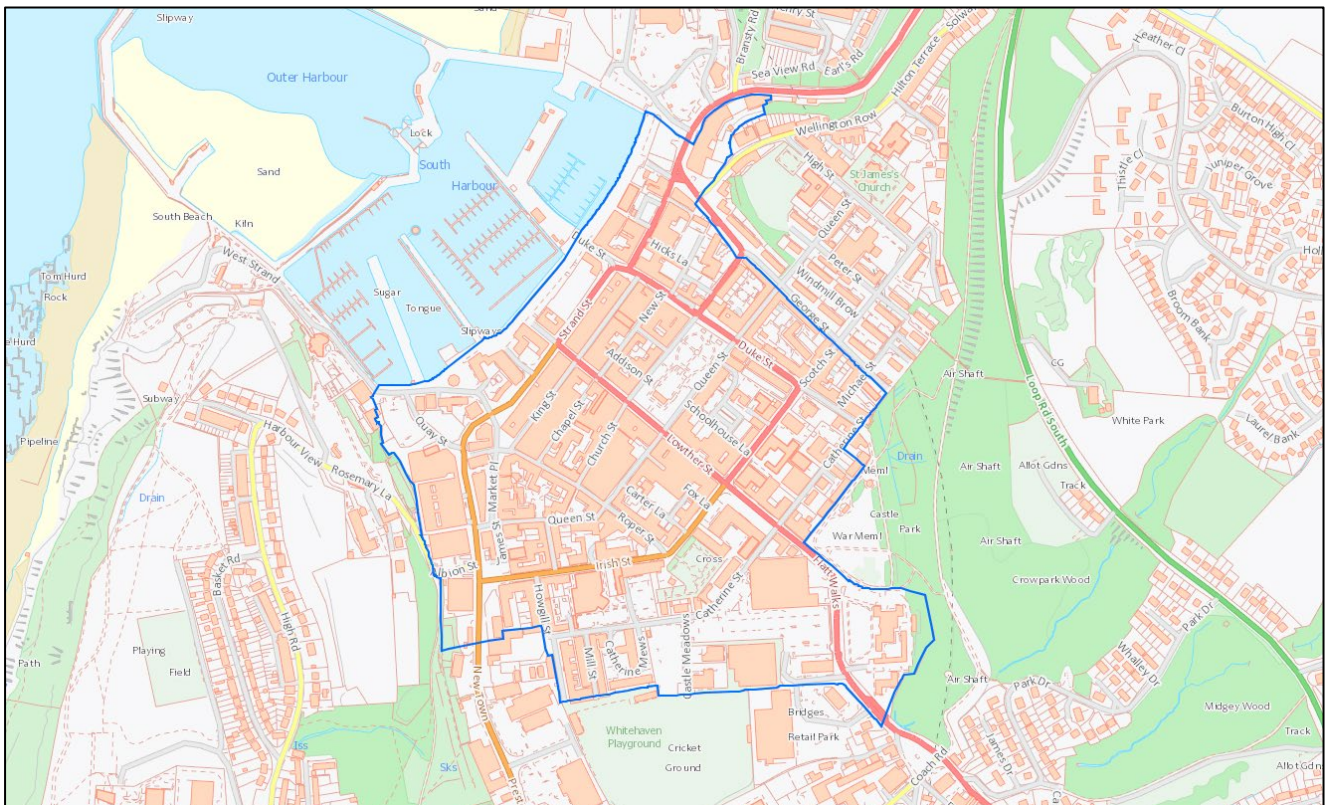
## Health Check Assessment (September 2023)

### Centre Overview

Whitehaven is a harbour town on the west Cumbria coast. It is the first post-medieval new planned town in England and the most complete example of planned Georgian architecture in Europe. Whitehaven is located 11km south of Workington via the A595, which also connects the town to Carlisle. It is easily accessible from the A595 and Whitehaven Train Station. The harbour at Whitehaven is the start of the 'C2C' (Sea to Sea) cycle routes, a popular cycling challenge. The population of the town was 24,942 at the 2021 census.

The town's growth was largely due to the historic exploitation of the extensive coal measures, driving a growing export of coal through the harbour from the 17th century onwards. It was also a major port for trading with the American colonies, and was, after London, the second busiest port of England by tonnage from 1750 to 1772. This prosperity led to the creation of a Georgian planned town in the 18th century which has left an architectural legacy of over 170 listed buildings.

The Copeland Local Plan identifies Whitehaven as the principal town within the authority area. Whitehaven town centre is the principal centre in Copeland Borough and provides the main hub of retail and service uses within the Borough, benefiting from two train stations. Notwithstanding Whitehaven's important role in serving Copeland's needs, the town centre also provides an offer which complements that of nearby Workington.



**Figure 1: Whitehaven Principal Town Centre Boundary (Copeland Local Plan 2013-2028 Core Strategy Policies Map)**

The main focus of retailing in Whitehaven town centre is concentrated on King Street which is located in the western part of the town centre, close to the Marina. King Street, which comprises a northern and southern



stretch separated by Lowther Street, provides a traditional pedestrianised town centre shopping street. King Street is supported by the surrounding shopping streets of Lowther Street, Market Place, Duke Street and Tangier Street which are considered to form the main 'retail core' of the centre. Morrisons supermarket is located in the south-eastern part of the town centre at Flatt Walks and is adjoined immediately to the south by the Bridges Retail Park, which comprises retail warehousing units (occupiers include B&M Home stores, Greggs, Shoe Zone and Carpetright) and lies just outside of the adopted town centre boundary – although this is proposed to be extended in emerging planning policy to include the retail park.



**Figure 2: Morrisons Store in Whitehaven Principal Centre (September 2023)**

Additional traditional town centre retail units are located in more peripheral parts of the town centre, such as along Swingpump Lane, Bransty Row and Roper Street. There is a Tesco superstore located to the north of the town centre off Bransty Row, whilst Preston Street Retail Park is located immediately to the south-west. The Preston Street Retail Park comprises Aldi and Iceland supermarkets, as well as a Home Bargains store. There is also an Asda supermarket adjacent to the retail park.

## **Diversity of Uses**

### *Convenience Goods*

As Table I on the following page shows, Whitehaven's convenience retailing sector accounts for just 2.69% of all retail units located in the Principal Centre, which is much lower than the national average of 9.3%, albeit this does include a full offer Morrisons foodstore. The convenience provision within Whitehaven comprises of two



butchers' shops, several newsagents and off-licenses, a Herons Frozen Food store, and a Morrisons Store. The Morrisons store offers a full range of supermarket produce and includes pharmacy, café and 2 hours free parking for customers. The store appears to be in good health – the car park and store were busy at the time of our visit which was weekday mid-morning.

The Morrisons store acts as an anchor store for the centre, with a sports centre, health and medical centre, and various other community facilities and shops within walking distance. Residents can utilise the free parking and link trips between the store and surrounding facilities. The remaining convenience provision within the centre boundary does not offer parking and will likely fulfill only top-up or small shopping trips.

Whitehaven benefits from several edge-of-centre convenience stores, including ALDI, Iceland, Asda and Tesco. As edge-of-centre sites, these stores can also contribute to the health of the centre with increasing footfall through linked shopping trips and this was evident at the time of completing this health check. All of these stores offer parking and provide a good range of fresh, frozen and store cupboard produce (Iceland and Heron offering primarily frozen goods). Taking the edge-of-centre stores into consideration, the convenience offer appears to play a key role in sustaining the town centre overall.



**Figure 3: Units within Bridge Retail Park (edge-of-centre south of Morrisons) September 2023**

### *Comparison Goods*

Our visit to Whitehaven Principal Centre recorded 71 commercial units selling comparison goods, equating to 21.19% of all shop units within the Centre, compared with the national average position of 27.1%. Whitehaven caters for a vast range of comparison goods including electrical goods, household items and clothes.



The main focus of comparison retailing in Whitehaven town centre is concentrated on King Street which is located in the western part of the town centre, close to the Marina. King Street, which comprises a northern and southern stretch separated by Lowther Street, provides a traditional pedestrianised town centre shopping street. The comparison retail offer is supported by the surrounding shopping streets of King Street, Lowther Street, Market Place, Duke Street and Tangier Street which are considered to form the main ‘retail core’ of the centre.



Figure 4: Pedestrianised King Street in ‘Retail Core’ of Centre, September 2023

Table I: Diversity of Uses in Whitehaven Key Service Centre (surveyed in September 2023)

Use Type	Number of Units (September 2023)	
	No.	Whitehaven Key Service Centre %
Convenience	9	2.69%
Comparison	71	21.19%
Service	153	45.67%
Miscellaneous	35	10.45%
Vacant	67	20.00%
Total	335	100.00%



### *Leisure, Retail and Business Service Uses*

153 Service Units were recorded during our site visit in September 2023. This equated to 45.67% of all shop units within the Centre, just below the national average position of 49.6%. This is not unexpected. A principal centre, or town/city centre would tend to provide a higher comparison use type share and lower service use type share, which would be more prevalent in lower order centres. However, Whitehaven – although the principal centre in Copeland – is not a big centre in relative terms. Workington and Carlisle centres are much larger with purpose-built comparison shopping areas (including retail parks) that will cater more for residents' comparison shopping needs.

A range of service units were recorded during the site visit, including leisure services such as hairdressers, barbers and beauty salons, and business services such as accountants and solicitors. It is therefore clear that many people living within surrounding residential areas are regularly travelling to Whitehaven to access its leisure, retail, and business services.

### *Vacant Units*

A vacancy rate of 20.00% was identified on our visit to Whitehaven, which is higher than the current national average position of 14.1% and represents 67 vacant units within the entire town centre (i.e. beyond the Goad centre boundary and include fringe parts of the town centre). The vacant units comprise former banks, shop units, public houses and restaurants. Vacant units are located throughout the centre and will now include the former Wilkos unit on Lowther Street that was in the process of closing down at the time of inspection.

### *Other Miscellaneous Uses*

Alongside these categorised units, we also recorded 35 additional miscellaneous units serving Whitehaven, which equates to 10.45% of all units within the centre. Significant units categorised as miscellaneous within the Centre include places of worship, health centres, religious centres, nurseries, opticians, pharmacies, hotels and guest houses. Primarily, these units are located to the east of the centre boundary, away from the main 'retail core'. Notwithstanding this, it can be expected that users of these facilities would frequently use other services within the Centre.

## **Balance Between Independent and Multiple Stores**

Whitehaven comprises a total of 335 units, of which 33 are occupied by national multiple retailers. Discounting vacant units, of which there are 67, multiple stores comprise 12.31% of the centre's retail offering – which is lower than would be expected for a centre of this scale, role and function. This is balanced out, to some extent, by the range of independent shops.

The centre's lack in offer of national multiples is likely due to the approximate strong commercial destinations of Workington and Carlisle, limits regarding the sizes and types of available units in the centre to meet modern needs, and the out of centre retail parks, particularly within what was Allerdale's authority area.

Notwithstanding this, Dixon's is an independent department store on Lowther Street which occupies a large frontage with the retail floorspace extending over 3 floors. That Whitehaven centre is able to sustain this department store is a good indicator of health.

## **Accessibility**

Whitehaven Town Centre can be considered accessible, with a range of transport services close to and within the centre itself. Whitehaven is located 11km south of Workington via the A595, which also connects the town to Carlisle. The A595 continues south past Whitehaven and provides the main arterial road to the rest of West



Cumbria and smaller service centres within the Copeland plan area. Whitehaven Harbour and Marina is located just south of the train station. The harbour at Whitehaven is the start of the 'C2C' (Sea to Sea) cycle routes, a popular cycling challenge.

The former bus station has been redeveloped to provide flexible office space, however a number of bus stops are located along the B5345 at Tangier Street, Strand Street and Albion Place, and other stop are located throughout the town centre at Duke Street and Lowther Street.

Various Council car parks are which are chargeable and the food stores provide free parking for customers subject to time limitations.

### **Pedestrian Activity**

Pedestrian activity was moderate to low within the Centre – however, the time of our visit was a weekday morning and not peak time. The visit lasted roughly 2 hours as the entire centre was surveyed for this health check. Noticeably busier areas included the Morrisons store, King Street and the Harbour area. Quieter areas included the more residential streets without many shops or services, and the west of the centre around Swingpump Lane and Irish Street.

### **Environmental Quality**

Whitehaven town centre benefits from the defining characteristics of a harbour town, along with a market offering a range of goods from outdoor stalls held twice weekly.

Notwithstanding the vacancy rate in some parts of the town centre, the environmental quality of Whitehaven centre should be considered a good standard. The historic architecture and layout of the centre, owing to the town's prosperous history, provides a pleasant appearance generally and the public realm provides a number of trees, planters and seating for residents and visitors.





Figure 5: Historic Interest of the Centre, September 2023

## Summary / Conclusions

It is evident that Whitehaven performs an important role in catering for the retail and service needs of what was the Copeland Borough and to some extent the wider surrounding area, albeit on a relatively localised basis given the proximity of Workington, and further afield, Carlisle. In particular, the convenience offer (including edge of centre locations) is strong and clearly makes a significant contribution to sustaining the centre overall.

The centre has a strong cultural and tourist offer due to the prosperous history of the town and the harbour area which provides a pleasant visual quality and public realm. There are numerous historic and Listed Buildings throughout the centre which also add its overall attractiveness and vitality.



# Appendix VIII

## Convenience Goods Retail Impact Assessment tables



TABLE 1 TURNOVER OF PROPOSED ALDI DEVELOPMENT

Proposed new Aldi foodstore, Preston Street		Gross Floorspace (sq. m)	Net Floorspace (sq. m)	Turnover per sq. m in 2021 (£m)	Period to Test Year					
					2021	2022	2023	2024	2025	2026
Aldi Foodstore	Convenience	1916*	1,085	£11,427	£12.40	£11.44	£11.83	£12.16	£12.17	£12.19
	Comparison		271	£7,448	£2.02	£2.09	£2.09	£2.08	£2.12	£2.16
	Total		1,356	-	£14.42	£13.53	£13.92	£14.24	£14.29	£14.35

\* Gross internal area

Notes:

- a. Gross floorspace of proposed Aldi foodstore sourced from architectural drawings
- b. Net sales area and convenience goods / comparison goods floorspace split of Aldi provided by operator
- c. Turnover projected forwards using Experian forecast sales densities from Figures 4a and 4b (Page 16) of Experian Retail Planner Briefing Note 20 (February 2023)

2021 Prices



PRESTON STREET, WHITEHAVEN  
RETAIL IMPACT ASSESSMENT - OCTOBER 2023

TABLE 2a. POPULATION WITHIN EACH ZONE

ZONE	POPULATION					
	2021	2022	2023	2024	2025	2026
Zone 1	19081	19250	19286	19314	19348	19374
Zone 2	15980	16125	16160	16198	16229	16280
Zone 3	17,730	17,888	17,902	17,900	17,907	17897
Zone 4	9825	9911	9907	9901	9907	9903
Zone 5	35116	35417	35480	35542	35562	35567
Zone 6	37869	38020	37883	37729	37590	37427
Zone 7	16858	16912	16822	16758	16668	16592
Zone 8	10,870	10,922	10,872	10,824	10,773	10743
<b>TOTAL</b>	<b>163,329</b>	<b>164,445</b>	<b>164,312</b>	<b>164,166</b>	<b>163,984</b>	<b>163,783</b>
<b>Notes:</b>						
a. Base population derived from Experian Location Analyst data (October 2023 Report)						
b. Base year taken as 2023 and test/design year as 2026						

TABLE 2b. PER CAPITA CONVENIENCE EXPENDITURE WITHIN STUDY AREA (EXCLUDING NON STORE RETAIL TRADE DEDUCTION)

ZONE	CONVENIENCE GOODS EXPENDITURE PER HEAD (EXCLUDING NSRT DEDUCTION)					
	2021	2022	2023	2024	2025	2026
Zone 1	£3,033	£2,830	£2,762	£2,751	£2,751	£2,754
Zone 2	£2,734	£2,551	£2,490	£2,480	£2,480	£2,482
Zone 3	£3,149	£2,938	£2,868	£2,856	£2,856	£2,859
Zone 4	£3,250	£3,032	£2,959	£2,948	£2,948	£2,951
Zone 5	£2,853	£2,662	£2,598	£2,588	£2,588	£2,590
Zone 6	£2,832	£2,642	£2,579	£2,569	£2,569	£2,571
Zone 7	£3,132	£2,922	£2,852	£2,841	£2,841	£2,843
Zone 8	£3,037	£2,834	£2,766	£2,754	£2,754	£2,757
<b>ANNUAL GROWTH</b>	-	<b>-6.7%</b>	<b>-2.4%</b>	<b>-0.4%</b>	<b>0.0%</b>	<b>0.1%</b>
<b>Notes:</b>						
a. Per capita expenditure derived from Experian Location Analyst data (October 2023 Report)						
b. Expenditure excludes Non Store Retail Trade in line with 'adjusted' allowance derived from Figure 5, Appendix 3 of Experian Retail Planner Briefing Note 20 (Feb 2023)						
<b>2021 Prices</b>						

TABLE 2c. PER CAPITA CONVENIENCE EXPENDITURE WITHIN STUDY AREA (INCLUDING NON STORE RETAIL TRADE DEDUCTION)

ZONE	CONVENIENCE GOODS EXPENDITURE PER HEAD (INCLUDING NSRT DEDUCTION)					
	2021	2022	2023	2024	2025	2026
Zone 1	£2,857	£2,666	£2,607	£2,589	£2,580	£2,577
Zone 2	£2,575	£2,403	£2,350	£2,333	£2,326	£2,323
Zone 3	£2,966	£2,768	£2,707	£2,688	£2,679	£2,676
Zone 4	£3,062	£2,856	£2,794	£2,774	£2,765	£2,762
Zone 5	£2,688	£2,507	£2,452	£2,435	£2,427	£2,424
Zone 6	£2,668	£2,489	£2,434	£2,417	£2,409	£2,407
Zone 7	£2,950	£2,753	£2,692	£2,673	£2,664	£2,661
Zone 8	£2,861	£2,669	£2,611	£2,592	£2,584	£2,581
<b>ANNUAL DEDUCTION</b>	<b>5.8%</b>	<b>5.8%</b>	<b>5.6%</b>	<b>5.9%</b>	<b>6.2%</b>	<b>6.4%</b>
<b>Notes:</b>						
a. Per capita expenditure derived from Experian Location Analyst data (October 2023 Report)						
b. Expenditure excludes Non Store Retail Trade in line with 'adjusted' allowance derived from Figure 5, Appendix 3 of Experian Retail Planner Briefing Note 20 (Feb 2023)						
<b>2021 Prices</b>						

TABLE 2d. TOTAL CONVENIENCE GOODS EXPENDITURE WITHIN STUDY AREA

ZONE	TOTAL CONVENIENCE GOODS EXPENDITURE (£m)					
	2021	2022	2023	2024	2025	2026
Zone 1	£54.52	£51.31	£50.28	£49.99	£49.92	£49.93
Zone 2	£41.16	£38.75	£37.98	£37.80	£37.75	£37.82
Zone 3	£52.59	£49.51	£48.46	£48.11	£47.97	£47.89
Zone 4	£30.08	£28.31	£27.68	£27.46	£27.39	£27.35
Zone 5	£94.38	£88.81	£87.01	£86.54	£86.31	£86.23
Zone 6	£101.02	£94.63	£92.22	£91.19	£90.56	£90.07
Zone 7	£49.74	£46.55	£45.29	£44.79	£44.41	£44.16
Zone 8	£31.10	£29.15	£28.38	£28.06	£27.83	£27.72
<b>TOTAL</b>	<b>£454.58</b>	<b>£427.02</b>	<b>£417.31</b>	<b>£413.94</b>	<b>£412.16</b>	<b>£411.18</b>
<b>Notes:</b>						
a. Total available expenditure (2(d)) calculated by multiplying population from Table 2(a) by expenditure per head (minus NSRT deduction) from Table 2(c)						
<b>2021 Prices</b>						



[illegible]



Comprehensive Project Performance Dashboard - Q3 2024																					
Project Overview		Phase 1				Phase 2				Phase 3				Phase 4				Phase 5			
		Sub-Task	Target	Actual	Variance	Sub-Task	Target	Actual	Variance	Sub-Task	Target	Actual	Variance	Sub-Task	Target	Actual	Variance	Sub-Task	Target	Actual	
Project Name: Strategic Initiative Alpha		2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15		
Overall Status: On Track		95%	98%	3%	92%	90%	2%	88%	2%	85%	3%	82%	3%	80%	2%	78%	2%	75%	3%	72%	
Key Metrics: Progress & Budget		2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15	2024-09-01	2024-09-15		
Phase 1																					
Task 1.1: Initial Planning		100%	100%	0%	100%	100%	100%	0%	100%	100%	100%	0%	100%	100%	100%	0%	100%	100%	100%	0%	
Task 1.2: Resource Allocation		90%	92%	2%	88%	90%	90%	0%	85%	90%	90%	0%	80%	90%	90%	0%	75%	90%	90%	0%	
Task 1.3: Stakeholder Engagement		80%	85%	5%	75%	80%	5%	70%	5%	65%	70%	5%	60%	65%	5%	55%	60%	5%	50%	5%	
Task 1.4: Risk Assessment		70%	72%	2%	68%	70%	2%	65%	2%	60%	65%	5%	55%	60%	5%	50%	55%	5%	45%	5%	
Task 1.5: Communication Plan		60%	62%	2%	58%	60%	2%	55%	2%	50%	55%	5%	45%	50%	5%	40%	45%	5%	35%	5%	
Task 1.6: Project Charter		50%	52%	2%	48%	50%	2%	45%	2%	40%	45%	5%	35%	40%	5%	30%	35%	5%	25%	5%	
Task 1.7: Scope Definition		40%	42%	2%	38%	40%	2%	35%	2%	30%	35%	5%	25%	30%	5%	20%	25%	5%	15%	5%	
Task 1.8: Budget Approval		30%	32%	2%	28%	30%	2%	25%	2%	20%	25%	5%	15%	20%	5%	10%	15%	5%	5%	5%	
Task 1.9: Team Formation		20%	22%	2%	18%	20%	2%	15%	2%	10%	15%	5%	5%	10%	5%	0%	5%	5%	0%	5%	
Task 1.10: Kick-off Meeting		10%	12%	2%	8%	10%	2%	5%	2%	0%	5%	5%	0%	0%	5%	0%	0%	0%	0%	5%	
Task 1.11: Initial Report		5%	6%	1%	4%	5%	1%	3%	1%	0%	3%	3%	0%	0%	3%	0%	0%	0%	0%	3%	
Task 1.12: Review Meeting		2%	3%	1%	1%	2%	1%	0%	1%	0%	1%	1%	0%	0%	1%	0%	0%	0%	0%	1%	
Task 1.13: Final Review		1%	1%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.14: Project Closure		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.15: Post-mortem		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.16: Lessons Learned		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.17: Archiving		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.18: Final Report		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.19: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.20: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.21: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.22: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.23: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.24: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.25: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.26: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.27: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.28: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.29: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.30: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.31: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.32: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.33: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.34: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.35: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.36: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.37: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.38: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.39: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.40: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.41: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.42: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.43: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.44: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.45: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.46: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.47: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.48: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.49: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.50: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.51: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.52: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.53: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.54: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.55: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.56: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.57: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.58: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.59: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.60: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.61: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.62: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.63: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.64: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.65: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.66: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.67: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.68: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.69: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.70: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.71: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.72: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.73: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.74: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.75: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.76: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.77: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.78: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.79: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.80: Project Review		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.81: Project Evaluation		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.82: Project Feedback		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.83: Project Improvement		0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	
Task 1.84: Project Handover		0%	0%	0%	0%	0%	0%	0%	0%	0%											



1. The following information is required for the purpose of the audit:
   
2. The following information is required for the purpose of the audit:

Description	2015		2016		2017		2018		2019		2020		2021		2022		2023		2024		2025		2026		2027		2028		2029		2030																
	2015	2016	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030													
	2015	2016	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030													
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
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2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
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2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2015	2016	2017	2018	2019	2020	2021	2022	2																							



TABLE 5. EXISTING CONVENIENCE GOODS SHOPPING PATTERNS FOR ZONE 6 (£m) IN 2026

**ZONE 6**

POSTCODE SECTOR	EXPENDITURE FLOW (%)	2026 (£M)
Zone 1	0.2%	0.2
Zone 2	0.1%	0.1
Zone 3	0.3%	0.3
Zone 4	0%	0.0
Zone 5	4%	3.7
Zone 6	94%	84.9
Zone 7	1%	0.5
Zone 8	0%	0.0
Beyond Study Area	0.3%	0.3
TOTAL	100%	£90.10
Note: Shopping patterns taken from Tables 3 and 4		



TABLE 6. ANTICIPATED CONVENIENCE TRADE DRAW TO ALDI DEVELOPMENT

ZONE	TRADE DRAW (%)	2026 (£M)
Zone 1	0%	0.0
Zone 2	0%	0.0
Zone 3	0%	0.0
Zone 4	0%	0.0
Zone 5	0%	0.0
Zone 6	90%	11.0
Zone 7	10%	1.2
Zone 8	0%	0.0
Beyond Study Area	0%	0.0
TOTAL	100.00%	£12.19
Note: Trade draw informed by shopping patterns for primary catchment.		



**PRESTON STREET, WHITEHAVEN**  
**RETAIL IMPACT ASSESSMENT - OCTOBER 2023**  
**TABLE 7. CONVENIENCE GOODS TRADE DRAW ALLOCATION OF ALDI PROPOSALS (£m)**

Destination	Convenience turnover from Zone 6	Convenience turnover from wider study area 2026	Total Convenience turnover (from HH survey) 2026	Zone 6		Zone 7	
	Total (£m)	Total (£m)	Total (£m)	(£m)	(%)	(£m)	(%)
<b>Zone 6</b>							
<b>WHITEHAVEN TOWN CENTRE</b>	<b>31.7</b>	<b>11.0</b>	<b>42.7</b>	<b>0.0</b>	<b>0%</b>	<b>0.0</b>	<b>0%</b>
Local shops, Whitehaven Town Centre	0.4	0.0	0.4	0.0	0%	0.0	0%
B&M, The Bridges Retail Park, Whitehaven, CA28 7RQ	0.8	0.0	0.8	0.0	0%	0.0	0%
Haighs, King Street, Whitehaven, CA28 7JH	0.0	0.0	0.0	0.0	0%	0.0	0%
Heron, King Street, Whitehaven, CA28 7LA	0.8	0.0	0.8	0.0	0%	0.0	0%
Morrisons, Flatt Walks, Whitehaven	29.7	11.0	40.7	0.0	0%	0.0	0%
Tesco Superstore, Bransty Row, North Shore, Whitehaven	21.8	6.9	28.7	0.0	0%	0.0	0%
Iceland, Preston Street, Whitehaven	1.5	0.2	1.75	0.0	0%	0.0	0%
Home Bargains, Preston Street, Whitehaven, CA28 9DL	0.5	0.0	0.5	0.0	0%	0.0	0%
Asda, Preston Street, Whitehaven	3.8	0.5	4.36	0.0	0%	0.0	0%
Aldi, Preston Street, Whitehaven	17.9	8.2	26.1	11.0	100%	1.2	100%
Nisa Local, Four Seasons, Whinlatter Road, Whitehaven, CA28 8DJ	0.4	0.0	0.4	0.0	0%	0.0	0%
Nisa Local, Woodhouse Road, Whitehaven, CA28 9QD	0.5	0.0	0.5	0.0	0%	0.0	0%
Spar (Service Station), Loop Road North, Whitehaven	0.4	0.0	0.4	0.0	0%	0.0	0%
Spar, Richmond Hill Road, Hensingham, Whitehaven	0.9	0.0	0.9	0.0	0%	0.0	0%
Woodhouse Convenience Store, Woodhouse Road, Whitehaven CA28 9LL	0.1	0.0	0.1	0.0	0%	0.0	0%
Premier Stores, Meadow Road, Whitehaven, CA28 8ER	0.0	0.0	0.0	0.0	0%	0.0	0%
McColl's, Lakeland Avenue, Seacliffe, Whitehaven, CA28 9PY	0.8	0.0	0.8	0.0	0%	0.0	0%
<b>CLEATOR MOOR KEY SERVICE CENTRE</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0%</b>	<b>0.0</b>	<b>0%</b>
Local shops, Cleator Moor Centre	0.0	0.0	0.0	0.0	0%	0.0	0%
Nisa, Leconfield Street, Cleator Moor, CA25 5QG	0.0	0.3	0.3	0.0	0%	0.0	0%
Co-op, Leaconfield Street, Cleator Moor	4.2	3.1	7.3	0.0	0%	0.0	0%
<b>FRIZINGTON LOCAL CENTRE</b>	<b>0.3</b>	<b>0.0</b>	<b>0.3</b>	<b>0.0</b>	<b>0%</b>	<b>0.0</b>	<b>0%</b>
Local shops, Frizington Centre	0.0	0.0	0.0	0.0	0%	0.0	0%
Frizington Post Office & General Store, Main Street, Frizington, CA26 3SA	0.3	0.0	0.3	0.0	0%	0.0	0%
Local shops, Hensingham	0.1	0.0	0.1	0.0	0%	0.0	0%
Local shops, Mirehouse	0.0	0.0	0.0	0.0	0%	0.0	0%
<b>ZONE 6 SUB-TOTAL</b>	<b>84.87</b>	<b>30.26</b>	<b>115.13</b>	<b>10.97</b>	<b>100%</b>	<b>1.22</b>	<b>100%</b>
<b>TOTAL</b>	<b>84.9</b>	<b>30.3</b>	<b>115.1</b>	<b>10.97</b>	<b>100%</b>	<b>1.22</b>	<b>100%</b>

**Notes:**

- a. Trade allocation of the proposal based on the primary catchment area, existing shopping patterns as informed by Tables 3 and 4, and geographic location of retail provision.  
b. Turnover of ALDI store from Table 1 ALDI turnover.



PRESTON STREET, WHITEHAVEN

RETAIL IMPACT ASSESSMENT - OCTOBER 2023

TABLE 8. CONVENIENCE TURNOVER ANALYSIS FOR PROPOSED ALDI STORE AND NEW FOODSTORE OPERATOR INTO EXISTING ALDI STORE 2026

TABLE 8a. TURNOVER OF EXISTING ALDI STORE - SURVEY BASED AND BENCHMARK TURNOVERS

	Survey turnover (£m)	Benchmark turnover (£m)	Overtrading (£m)
Turnover of existing ALDI store	26.06	8.45	17.61

TABLE 8b. TURNOVER OF EXISTING ALDI STORE, NEW FOODSTORE OPERATOR INTO EXISTING ALDI STORE AND RESIDUAL TURNOVERS

	Turnover (£m)
Turnover of existing ALDI store	26.06
Turnover of proposed ALDI store	12.19
<b>Residual turnover</b>	<b>13.88</b>
Turnover of new foodstore operator into existing ALDI store	7.47
<b>Residual turnover</b>	<b>6.41</b>

TABLE 8c. BENCHMARK TURNOVER OF EXISTING ALDI STORE AND NEW FOODSTORE OPERATOR INTO EXISTING ALDI STORE

		Gross Floorspace (sq. m)	Net Floorspace (sq. m)	Turnover per sq. m in 2021 (£m)	Test Year	
					2021	2026
Existing ALDI foodstore	Convenience sales	-	752	£11,427	£8.59	£8.45
New foodstore operator into existing ALDI store	Convenience sales	-	827	£9,181	£7.59	£7.47

**Notes:**

- a. Analysis of new foodstore operator into existing ALDI store based on combination of Farmfoods, LIDL and M&S Simply Food.
- b. Convenience net sales area of new foodstore operator into existing ALDI store based on average across Farmfoods, LIDL and M&S Simply Food.
- c. Convenience sales density of new foodstore operator into existing ALDI store based on average across Farmfoods, LIDL and M&S Simply Food.
- d. Net convenience sales areas and sales densities derived from GlobalData 'Convenience and Comparison Goods Sales Densities of Major Grocers' (2022 Edition). Note, GlobalData does not include Farmfoods, therefore Iceland has been used as the most comparable operator.
- e. Turnovers projected forwards using Experian forecast sales densities from Figures 4a and 4b (Page 16) of Experian Retail Planner Briefing Note 20 (February 2023)
- f. Turnover of proposed ALDI store taken from table 1.
- g. Survey based turnover of existing ALDI store taken from table 4.

**2021 Prices**



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