



Planning & Retail Statement

Land at East Road and Wyndham Place, Egremont

January 2024

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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 on land at East Road and Wyndham Place, Egremont.
- 1.2 Full planning permission is sought for "*Demolition of existing buildings and erection of a discount food store (Use Class E), alterations to vehicular and pedestrian access, provision of car and cycle parking, servicing area, hard and soft landscaping and associated works*".
- 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.
- 1.4 As the intention is that the Class E retail foodstore will be occupied by Aldi Stores Ltd. This assessment therefore includes background information on Aldi, to help understand the specific format of retail use proposed. This background on Aldi as a retailer is considered to be particularly relevant to assessing the proposals against relevant planning policy and in informing our assessment against such policy matters.
- 1.5 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)
- Transport Assessment (Andrew Moseley Associates)
- Travel Plan (Andrew Moseley Associates)
- Air Quality Assessment (NJD Environmental)
- Preliminary Ecological Appraisal & Preliminary Roost Assessment (Total Ecology)
- Biodiversity Metrics (Total Ecology)
- Arboricultural Impact Assessment (All About Trees)
- Arboricultural Method Statement (All About Trees)
- Phase 1 Geo-Environmental Assessment (3E Consulting Engineers)
- Ground Investigation Report (Hydrock)
- Flood Risk Assessment and Drainage Strategy (Hydrock)
- Noise Impact Assessment (Paul Horsley Acoustics)
- Demolition Method Statement (Projekt Construction)

Application Drawings

- 0541-PA-XX-00-DR-A-PM_40_50_21-0001 Rev P01 - Location Plan (Projekt Architects)
- 0541-PA-XX-00-DR-A-PM_40_50_21-0002 Rev P01 - Proposed Site Plan (Projekt Architects)
- 0541-PA-XX-00-DR-A-PM_40_50_21-0003 Rev P01 - Proposed Floor Plan (Projekt Architects)
- 0541-PA-XX-00-DR-A-PM_40_50_21-0004 Rev P01 - Proposed Roof Plan (Projekt Architects)
- 0541-PA-XX-00-DR-A-PM_40_50_21-0005 Rev P01 - Proposed Elevations (Projekt Architects)
- 0541-PA-XX-00-DR-A-PM_40_50_21-0006 Rev P01 - Site Sections (Projekt Architects)
- NSH 015 P101 – Landscape Plan (Nicola Hills Studio)

1.6 The Statement has been set out within the following sections:

- **Section 2: Site Description & Surroundings** – Provides a description of the Site and its surroundings;
- **Section 3: The Proposed Development** – Sets out the details of the application proposals;
- **Section 4: Aldi Stores Ltd** – Offers an overview of ALDI and outlines some of the key benefits that the business hopes to bring to Egremont;
- **Section 5: Planning Policy Context** – Comprises an overview of relevant local and national planning policies;
- **Section 6: The Sequential Test** – Tests the application proposals against the sequential approach to site selection as defined under Paragraph 91 of the *National Planning Policy Framework* ('the NPPF');
- **Section 7: Retail Impact Assessment** – Discusses the trading effects of the proposed development.
- **Section 8:** 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 9:** Evaluates the development proposals against the policy balance set out within Paragraph 11 of the NPPF, providing overall conclusions.

2. Site Description and Surroundings

The Application Site

- 2.1 The Application Site ('the Site') extends to approximately 0.65ha located on the site of the former East Road Garage site located on land at East Road and Wyndham Place, Egremont. A location plan is included at Appendix 1 of this report, and an aerial extract shown below.



Figure 1: Location (Source: Google Maps)

- 2.2 The Site was previously occupied as an 'Esso' petrol filling station; 'Rapid Fit' vehicle repair garage; and 'Ford' car dealership, with associated car parking and hardstanding areas until its closure around circa. 2020. The Site has remained vacant since that time and can be considered to be brownfield.
- 2.3 The Site is located within the settlement boundary of Egremont to the north-east of the designated town centre boundary, in an edge-of-centre location in retail policy terms. The A595 borders the Site to the west, with predominantly existing residential development to the north, east and south.
- 2.4 Established existing points of vehicular and pedestrian access which previously served the Site are provided at both East Road and Wyndham Place. A pedestrian subway crossing point also immediately abuts the western boundary of the Site, which passes under the A595 dual carriageway and links the Site to the Egremont Town Centre to the south at Main Street. National Cycle Route 72 also abuts the eastern boundary of the site, providing active sustainable transport linkages both locally and further afield.

Planning History

- 2.5 The Cumberland Council Planning Portal / My Neighbourhood GIS website shows limited planning history for the Site. Application details available relate to the use of the Site in the past as a petrol filling station and garage, including a small selection of advertisement applications. We provide a summary of the historical applications as follows:

Details	Description	Status
4/06/2019/0	Illuminated Wall Mounted and Free Standing Sign	Approved February 2006
4/05/2737/0	One Internally Illuminated Double Sided Free Standing Display Unit	Refused November 2005
4/95/0082/0	Improvements to PFS and Garage Inc. Partial Demolition	Approved April 1995
4/93/0093/0	Canopy Fascia Signs; Shop Fascia Sign and Free, Standing Sign	Approved August 1993
4/92/0892/0	Redevelopment of Existing Petrol Filling Station	Approved January 1993
4/92/0468/0	Improvements to Forecourt and Petrol Pumps, Retaining Wall and Resurface Parking Area.	Approved August 1992

- 2.6 As detailed in the table above, all applications are in excess of 15 years old and therefore have limited relevance to the consideration of the current development proposals. However, the limited planning history clearly demonstrates a longstanding established use of the Site as a petrol filling station, garage and associated car park.

3. The Proposed Development

3.1 The detailed description of development for the proposals which seek full planning permission is as follows:

'Demolition of existing buildings and erection of a discount food store (Use Class E), alterations to vehicular and pedestrian access, provision of car and cycle parking, servicing area, hard and soft landscaping and associated works on land at East Road and Wyndham Place, Egremont

3.2 For the purposes of this assessment, the development will comprise:

- Erection of a Use Class E foodstore with a Gross External Floor Area of 1,933sqm, Gross Internal Area (including loading bay & lobby) of 1,855sqm, and a net sales area of 1,408 sqm;
- Provision of 86 car parking spaces including 5 accessible spaces and 9 parent and child spaces;
- Of the proposed 86 parking spaces, 4 will be equipped with Electric Vehicle Charging Points;
- Cycle stands to accommodate 8 bicycles for customers, and long stay bicycle parking spaces (located within the store's warehouse) for staff;
- Servicing provision at the western elevation of the proposed foodstore;
- Provision of an internal vehicular route through the Site; upgraded priority-controlled T-junction from Wyndham Place and upgrades to the carriageway width of Wyndham Place; and formalisation and upgrades to the Wyndham Place / Wyndham Terrace junction and the Wyndham Place / East Road junction.
- Pedestrian access throughout the Site, including provision of additional point of access on the southwestern boundary adjacent to the existing subway;
- Soft and hard landscaping works, including new landscaping and planting to improve the Site's aesthetic appearance.

3.3 The proposed site layout is reproduced below:



Figure 2: Proposed Site Plan Extract

- 3.4 The configuration of the site has been carefully considered, with a variety of options assessed to arrive with the proposed layout. This process focused on the competing demands to ensure the local characteristics of the area were fully considered, and that a sensitively designed layout could be developed whilst meeting Aldi’s operational requirements.
- 3.5 The outcome of this process resulted in a form of development whereby the store has been positioned towards the south-eastern boundaries of the site. The proposed site arrangement ensures that there would be no adverse impact on adjacent residential properties and maximises the accessibility of the site, particularly in relation to the nearby Egremont town centre boundary.
- 3.6 The proposed layout allows for the main entrance to the store to be located at the northern elevation of the building, therefore being well-positioned to maximise engagement with East Road, Wyndham Place and the pedestrian subway providing direct onward linkages towards Egremont town centre. The layout also allows for the most appropriate options for pedestrian and cycle traffic visiting the store, as well as upgrading vehicular access to the site.

Design

- 3.7 Regarding the store itself, this comprises a single storey building with the northern facade comprising high levels of glazing, canopy, and the main entrance area to deliver an attractive facade and an inviting draw for customers. This has been deliberately positioned to maximise its active frontage visible to Wyndham Place and East Road, with linkages to active travel routes and the pedestrian subway and the boundary of Egremont town centre.
- 3.8 The high-quality elevations of the proposed Aldi are shown below:



Figure 3: Proposed Elevations Extract

- 3.9 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.
- 3.10 The delivery area to the store will be created through the installation of a service pod and docking area to the southern side of the store, which will be largely screened from view by a variety of existing and proposed hard and soft landscaping treatments. This approach avoids conflict with customers, as well as protecting the amenity of existing adjacent neighbouring properties.
- 3.11 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 windows to the western side of the elevations to allow light into the staff rooms. There are no other windows and therefore no opportunities for issues relating to overlooking or privacy.
- 3.12 We would refer the reader to the submitted Design & Access Statement and supporting package of drawings for further information in this regard.

Accessibility

- 3.13 Customer vehicular, pedestrian and cycling access is provided at the northern edge of the site via a proposed modified point of access from Wyndham Place. The proposals also include an upgraded priority-controlled T-junction from Wyndham Place and upgrades to the carriageway width of Wyndham Place along with the formalisation and upgrades to the Wyndham Place / Wyndham Terrace junction and the Wyndham Place / East Road junction.
- 3.14 The proposed development will be served by a dedicated servicing area located to the south-east of the store. Deliveries will achieve access via Wyndham Place and will 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.
- 3.15 In addition to the north-eastern access, the development also proposes a dedicated non-motorised user (NMU) footpath to the south-west of the application site adjacent to the pedestrian subway/underpass. The proposed NMU link will connect the application site to the existing footway provision on the A595 roundabout junction and provide a more direct and shorter walking route for both customers and staff when walking to / from Egremont town.
- 3.16 The final detailed design solution for the proposed NMU and interface with the pedestrian subway/underpass remain subject to agreement with National Highways at the point of submission of this application. Feedback received thus far has been positive and constructive. It is anticipated that through these continued communications with National Highways and Cumberland Council that the detailed design solution will be agreed between all parties during the consideration of the application.
- 3.17 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.

- 3.18 To support cyclists there are cycle stands for 8 bicycles to the west of the service access road, in front of the staff rooms, where there will be natural surveillance.
- 3.19 The proposals also include 86 parking spaces comprising 68 standard bays; 9 parent & child; 5 accessible bays; and, 4 Electric Vehicle (EV) spaces. The accessible spaces are located to the immediate north of the store and have been located here as they provide the easiest and safest access to the store without customers needing to cross the car park route.
- 3.20 The Site sits to the east of Egremont town centre and is within walking distance of most, if not all, residential areas of Egremont. It is within close proximity to local bus stops on Main Street via the existing pedestrian subway.
- 3.21 The Site is well connected to the surrounding areas, sitting adjacent to the Egremont Bypass (A595) and East Road which connect directly to the town centre and beyond. The Site is also directly adjacent to National Cycle Route 72 on Wyndham Place and is therefore well positioned to support active travel. The implementation of a Travel Plan for the store will further promote sustainable travel behaviour.
- 3.22 Overall, the site offers excellent levels of accessibility by a range of sustainable modes of transport, which will be attractive for shoppers to the new store. We would also refer the reader to the supporting Transport Assessment prepared by Andrew Mosely Associates for further information in this regard.

Landscaping

- 3.23 Significant levels of new hard and soft landscaping is proposed around the perimeter and internally within the site. This includes a variety of trees and shrubs and a variety of low-level planting, fencing and railings which will provide attractive and welcoming views of the store. The proposals are shown on the extract below from the landscaping plan:

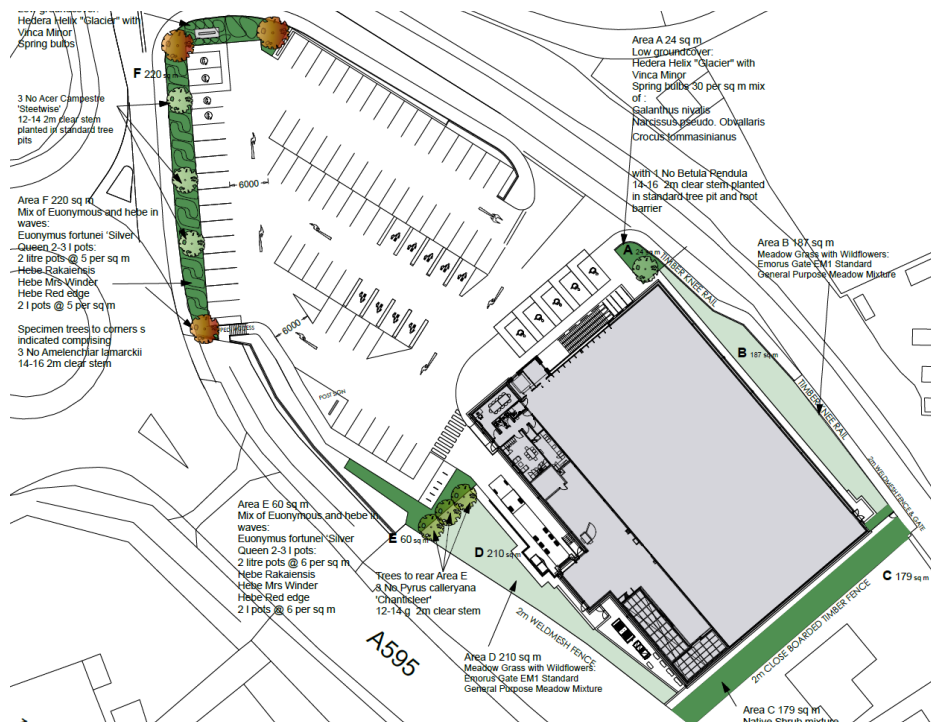


Figure 4: Extract from Proposed Landscaping Plan

- 3.24 We would also refer the reader to the supporting submitted Landscaping Plan and Design and Access Statement for further information in this regard.

Servicing / Noise

- 3.25 At the outset, it was identified that noise impact on existing residential properties required detailed consideration. As we have discussed above, the layout of the store has been considered extensively to ensure that the chosen layout is best suited to the site and existing residential properties near to the site. With this in mind, the location of the plant and servicing area has been located towards the western elevation of the store. Furthermore, the rear elevation of store comprises two escape doors which will be used to exit the store in emergencies only, therefore there will be no daily activity to the rear of the store.
- 3.26 To further mitigate against potential impacts on amenity, the proposals include the provision of appropriately designed close-boarded timber fence enclosing specific boundaries of the site, thereby providing additional screening to the proposed plant and service areas in relation to residential properties. This mitigation will be further enhanced and softened by the provision of a landscaping buffer around the boundaries of the site in key areas.
- 3.27 The Aldi delivery method is also important, where typically there are only one or two deliveries per day. A docking bay system is used at the store and is specifically designed with a rubber casing to minimise noise from the delivery process. All unloading of goods takes place within the warehouse. This helps to further reduce any impact on residential amenity. We would refer the reader to the accompanying Noise Impact Assessment prepared by Paul Horsley Acoustics Ltd. for further details regarding such matters.

Pre-Application Discussions

- 3.28 The redevelopment proposals have been the subject of both pre-application discussions with Cumberland Council (formerly Copeland Borough Council) as the local planning authority, and a public consultation process.
- 3.29 These discussions and feedback received as a result of the public consultation process 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. Full details of the public consultation are provided in the Statement of Community Involvement submitted with the planning application.
- 3.30 Overall, the application proposals represent the output of a collaborative process undertaken in-line with best practice guidance through collaborative pre-application discussions. A suggested validation list of supporting evidence documents was provided by the Council, all of which are included with the application package.

Cumberland Council

- 3.31 At an early stage of preparing the application, Aldi have engaged with Cumberland Council planning officers through a formal pre-application enquiry process. This process resulted in a pre-application meeting with officers in November 2023 and a formal response being issued in December 2023

whereby, the council offered support in respect of the principle of the proposed redevelopment of the site.

3.32 A number of comments were also made, which we summarise as follows:

- Consideration of siting, design and servicing to minimise adverse impact on neighbouring residential properties and the application should be supported by an appropriate Noise Impact Assessment.
- Further consideration of the position and materiality of the foodstore to be included within the Design & Access Statement and consideration of heritage matters to be included by way of a Heritage Statement.
- Consideration to ensure appropriate access and egress and appropriate levels of parking and cycle provision and application to be supported by an appropriate Transport Assessment.
- Consideration (via discussions with National Highways) of re-routing and creating step-free pedestrian access link to subway underpass.
- Proposals should consider Biodiversity Net Gain and should be supported by a Biodiversity Net Gain Assessment.

3.33 The above points are largely linked together through the need to provide a high-quality accessible development and ensure there is not an adverse impact on neighbouring residential properties or heritage assets. Pre-application feedback also required supporting information relating to the proposed means of access and quantum of proposed vehicular and cycle parking.

3.34 As discussed within the above section and the submitted Design and Access Statement, a number of site layouts were considered at an early stage of the design process. The chosen site layout positions the servicing to a discrete corner of the site at the west and introduces mitigation in this area to further mitigate potential for noise. No windows or regular activity is proposed at the southern elevation of the store adjacent to Rivendale to the south. Separation between the foodstore and Rivendale would be further enhanced by way of a hard and soft landscaping buffer.

3.35 Furthermore, the proposed layout is supported by the findings of the site-specific Noise Impact Assessment, which identifies that the mitigation proposed would allow the store to operate as proposed without any adverse impact on neighbours.

3.36 The proposals are accompanied by a detailed Transport Assessment and applicable drawings which considers in detail matters relating to quantum of parking, points of access and egress, and confirms that the proposed design solution for the site in this regard is wholly appropriate.

3.37 In response to the point relating to the proposed pedestrian access point linking the store to the pedestrian subway underpass - we can confirm that prior to submission of this application, Transport Consultants Andrew Mosely Associates have made direct contact with National Highways with the aim of seeking agreement on the preferred solution to improve pedestrian access to the adjacent subway underpass. Discussions remain ongoing at the point of submission of this application. It is anticipated that through these discussions and continued communications with Cumberland Council that an agreeable design solution will be agreed between all parties during the course of the detailed consideration of the current application.

- 3.38 Finally, in respect of the point raised relating to Biodiversity Net Gain we can confirm that appropriate consideration of such matters is included within the supporting reports prepared by Total Ecology.
- 3.39 In addition to the reports mentioned above, the application is also supported by the detailed list of validation requirements provided by the Council in their response dated 18 December 2023, namely: Design & Access Statement; Transport Assessment; Noise Impact Assessment; Heritage Statement; Ecology-related Surveys; Site Investigations; Retail Assessment; and Statement of Community Involvement, which address all other points raised as part of the pre-application process.

Public Pre-Application Consultation

- 3.40 Aldi have undertaken a public consultation process in advance of the submission of this planning submission. The full details of the consultation are included within the Statement of Community Involvement which accompanies this application submission. However, in summary, this has comprised the following actions: consultation involving the local community and key stakeholders at various meetings, a virtual exhibition, a consultation website, neighbour engagement through in-person door knocking, and reply cards. The discussions and the feedback received during this process have helped to shape the application proposals.
- 3.41 Following this consultation process, feedback was received from over 500 parties, with over 96% of respondents expressing support for the proposals.
- 3.42 Four key themes of concern were identified from the data received. These key themes of concern related to access and traffic; the amount of parking provision being insufficient; impact on local stores; and residential amenity. The application and supporting documents demonstrate that the applicant has taken each of these issues into consideration while formulating the final proposed scheme and these issues have been addressed insofar as possible. In this regard we would also refer the reader to the accompanying Statement of Community Involvement for additional information.
- 3.43 We consider that the extensive consultation activity included within the Statement of Community Involvement represents a worthwhile and best-practice approach to community engagement. The consultation process has been highly positive in the progression of the application; and that the comments received have proved beneficial in the final design of the proposals.

4. ALDI Stores Limited

About the Occupier

- 4.1 Aldi is one of the world's leading grocery retailers. The company has built a network of stores in Europe, the USA and Australia. Aldi first entered the UK market in 1990 and has now expanded to over 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 Grocer of the Year at the Retail Week Awards 2023. Aldi were also named Multiple Retailer of the Year 2023 at the Drinks Business Awards. For recognition of investment in people, Aldi has been awarded Employer of the Year at The Grocer Gold Awards on several occasions, most recently in 2023.

How ALDI is Different

- 4.4 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.
- 4.5 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.
- 4.6 The consequence of providing this value retailing concept and service, of high-quality food at heavily discounted prices, is that the design of the store and 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.

- 4.7 As stated, ALDI stores offer a carefully selected and limited core range of good quality exclusive own labels at heavily discounted prices. Predominantly, the limited range of goods relates to a reduced range of variations on the same product line compared to most other supermarkets. These are the most popular items: the ones most used and needed in every household.
- 4.8 By limiting the core range, ALDI suppliers typically only need to produce one package size instead of multiple packages within the same category. With the higher volume of one item, ALDI achieve greater purchasing power. The limited core range further allows ALDI to apply its own label to most of its products (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.
- 4.9 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.
- 4.10 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.
- 4.11 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.
- 4.12 ALDI's stores dedicate approximately 20% of their floorspace to comparison goods. These goods are sold as 'special purchases' on a 'when it's gone, it's gone' basis. This approach is highly seasonal and there is a continued variation in the type of goods that may be on offer. This is a key difference for ALDI when compared to larger supermarkets that typically have 30-40% of their floor area for comparison goods, the majority of which is occupied by permanent product ranges.
- 4.13 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

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

Catchment

- 4.15 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.
- 4.16 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

- 4.17 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.
- 4.18 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.
- 4.19 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

- 4.20 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.
- 4.21 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

- 4.22 The opening hours of ALDI stores are more limited than some other larger supermarkets which operate 24-hour. Typically, ALDI stores operate 0800 to 2200 Monday to Saturday and for six hours between 1000 to 1600 on Sundays, to comply with Sunday Trading Laws. As ALDI stores are often 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

- 4.23 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.
- 4.24 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.
- 4.25 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.
- 4.26 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.
- 4.27 ALDI's on-going graduate scheme secures an annual intake for the Area Management Programme. Trainee Area Managers spend a year shadowing an Area Manager before they take on three to four stores of their own to manage. The training covers the entire spectrum of running a retail operation and is a UK-wide programme.
- 4.28 The construction of a new store requires the services of local building trade contractors which provides employment opportunities during the build out period. Usually, a range of skills such as

ground works, steel, brick and block work and shop fitting are sourced locally, as well as cleaners and labourers.

4.29 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

4.30 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.

Main themes	Sub Theme	Proposed Measures to be Incorporated into the Development
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.
Site Management	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)

- 4.31 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.
- 4.32 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.
- 4.33 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.
- 5.2 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').
- 5.3 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.
- 5.4 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 (December 2023)** - 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.

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

Site Specific Policies

- 5.5 Although located wholly within the settlement boundary of Egremont, the Site is not allocated for any specific land use in the adopted Local Plan and can therefore be considered 'white land'. In the absence of any allocation or designation, white land should be determined in accordance with the existing and surrounding land uses and policies of the adopted development plan.
- 5.6 The surrounding land uses are a mixture of residential, with commercial uses across the A595 within Egremont Town Centre. Given the most recent commercial use of the site, surrounding land uses and proximity to the town centre, we consider, subject to compliance with other relevant planning policies, that the proposed use is one which would be expected in such a location and can therefore be supported in principle.
- 5.7 An extract of the Policies Map showing the Site and its surroundings and relevant designations within the Plan is provided in the extract below.

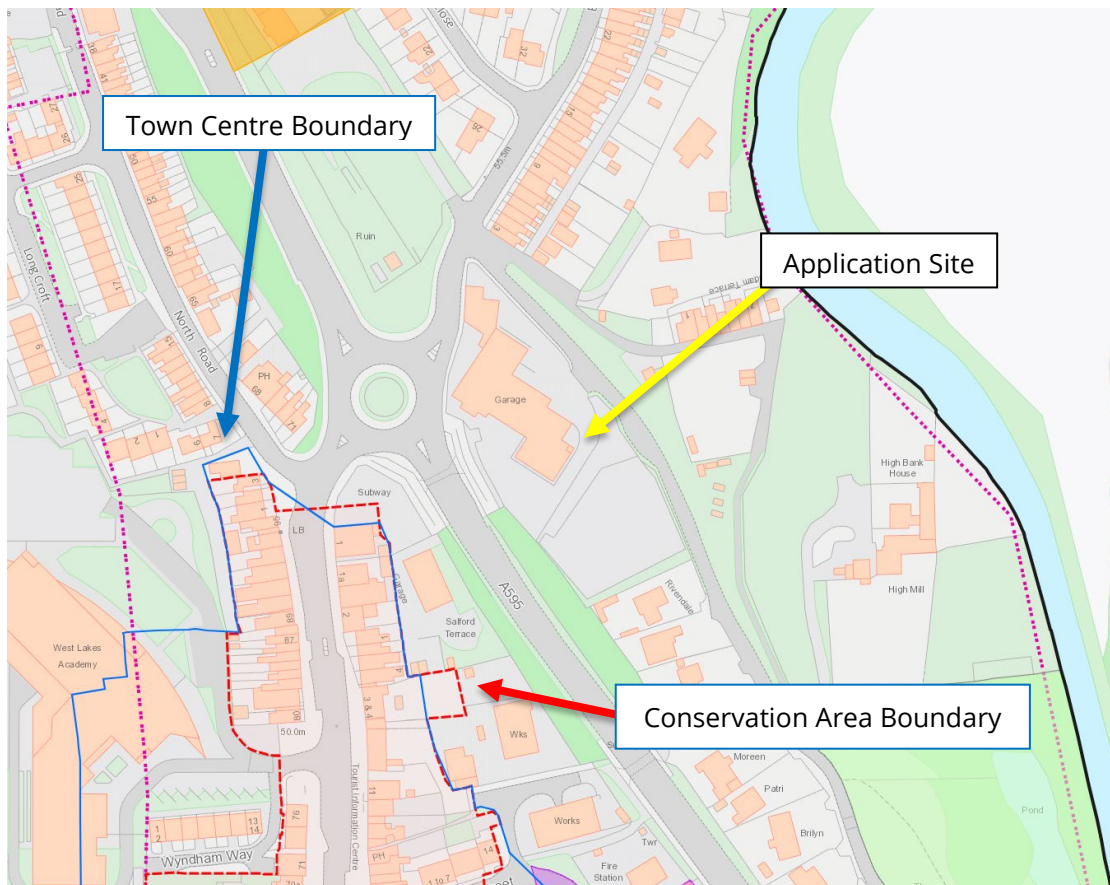


Figure 5: Copeland Local Plan 2013-28 Policies Map (Source: Cumberland Council)

Other Local Plan Policies

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

- Support development that provides or contributes to the Borough's social and community infrastructure enabling everyone to have good access to jobs, shops, services and recreational and sports facilities.
- Encourage development that minimises carbon emissions, maximises energy efficiency and helps us to adapt to the effects of climate change.
- Focus development on sites at least risk from flooding.
- Reuse existing buildings and previously developed land wherever possible.
- Prioritise development in the main towns where there is previously developed land and infrastructure capacity.
- Protect and enhance areas, sites, species and features of biodiversity value, landscapes and the undeveloped coast.
- Protect and enhance the Borough's cultural and historic features and their settings.
- 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.
- Apply rigorous design standards that retain and enhance locally distinctive places, improve build quality and achieve efficient use of land.
- Ensure development provides or safeguards good levels of residential amenity and security.

- Accommodate traffic and access arrangements in ways that make it safe and convenient for pedestrians and cyclists to move around.
 - Ensure new development addresses land contamination with appropriate remediation measures.
- 5.9 **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 Egremont as a Key Service Centre in the Plan which identifies its role as providing for a 'range of comparison and convenience shopping' and supports development reflecting the respective scale and functions.
- 5.10 **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 town centre renewal in Egremont.
- 5.11 **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 protect and where possible enhance the services and facilities provided in the Key Service Centres, which includes Egremont. The supporting text of this policy also references the sequential approach.
- 5.12 **Policy ER9: The Key Service Centres, Local Centres and other smaller centres** sets out that Retail and service development which promotes the vitality and viability of Key Service Centres (i.e. Egremont) and is consistent with the spatial development strategy as defined in Policy ST2 and Figure 3.2, will be supported.
- 5.13 **Policy T1: Improving Accessibility and Transport** sets out (in part) that the Council will support transport improvements that maximise accessibility for all modes of transport but particularly by foot, cycle and public transport and that priority will be given to improving the accessibility of the Borough's key development and regeneration sites, town and village centres, service, employment and transport hubs, and rural areas.
- 5.14 **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;

- 5.15 Individual development proposals will be assessed with regard to Development and Flood Risk under Policy DM24
- 5.16 **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;
- 5.17 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.
- 5.18 **Policy ENV4: Heritage Assets** sets out that the council's policy is to maximise the value of the Borough's heritage assets by protecting listed buildings, conservation areas and other townscape and rural features considered to be of historic, archaeological or cultural value. Policy DM27 supports this policy, setting out the Council's approach to development which affects built heritage and archaeology.
- 5.19 **Policy ENV5: Protecting and Enhancing the Borough's Landscapes** sets out (in part) that the Borough's landscapes will be protected and enhanced by A Protecting all landscapes from inappropriate change by ensuring that development does not threaten or detract from the distinctive characteristics of that particular area.
- 5.20 **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.
- 5.21 **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.
- 5.22 **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.

- 5.23 **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.
- 5.24 **Policy DM25: Protecting Nature Conservation Sites, Habitats and Species** seeks to protect the biodiversity value of land and buildings and protected species.
- 5.25 **Policy DM26: Landscaping** sets out that all development proposals will be assessed in terms of their potential impact on the landscape.
- 5.26 **Policy DM27: Built Heritage and Archaeology** sets out that development proposals which protect, conserve and where possible enhance the historic, cultural and architectural character of the Borough's historic sites and their settings will be supported.
- 5.27 **Policy DM28: Protection of Trees** requires an arboricultural assessment as to whether any trees are worthy of retention and protection.

Emerging Copeland Local Plan 2021-2038 (January 2022)

- 5.28 Copeland Borough Council are in the process of producing a new Local Plan which once adopted will replace the Core Strategy and saved policies.
- 5.29 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.

Site Specific Policies

- 5.30 The site identified within the Emerging Copeland Local Plan (2021-2038) as **Opportunity Site OEG03 'East Road Garage'**. It is described as a 0.62ha site and preferred uses are for "commercial and employment uses, but residential may also appropriate".
- 5.31 **Strategic Policy E6PU: Opportunity Sites** subsequently sets out Council support for the development and/or redevelopment of Opportunity Sites as the focus to help regenerate these towns, which includes Egremont.

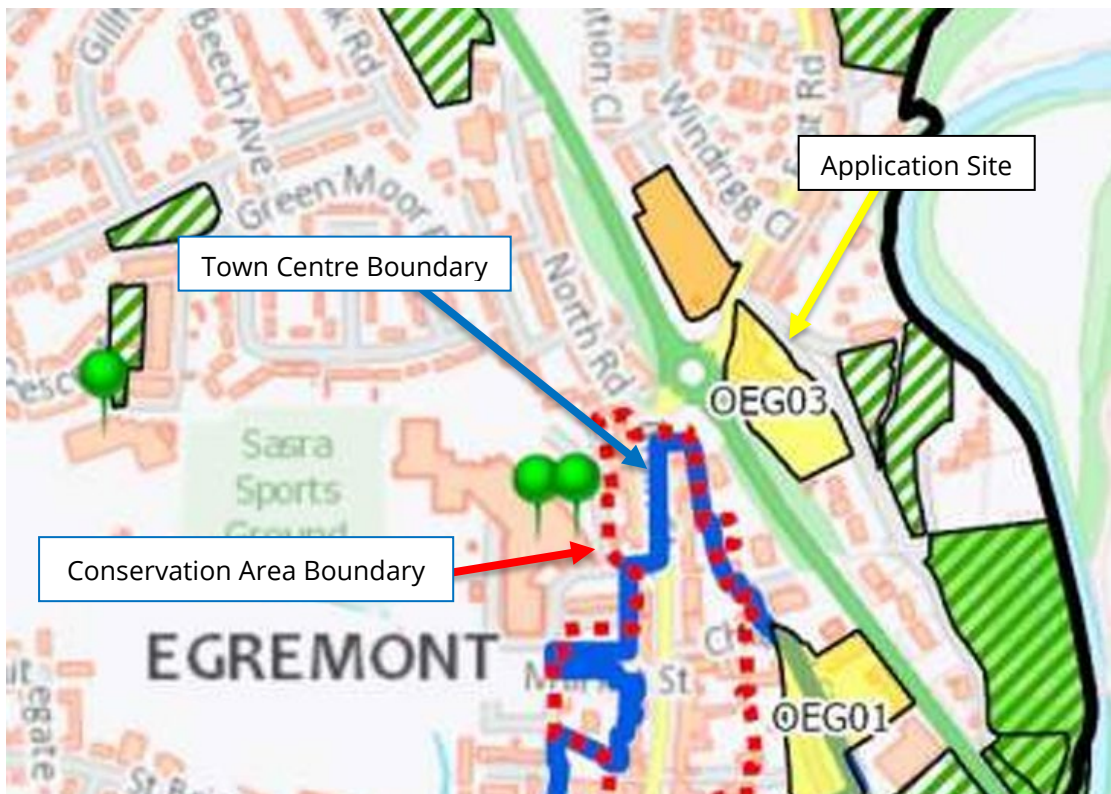


Figure 6: Emerging Local Plan Policies Map Extract with Key (Source: Cumberland Council)

Other Local Plan Policies & Supplementary Guidance

- 5.32 **Strategic Policy DS1PU: Presumption in favour of Sustainable Development** sets out that the Council will take a positive approach to sustainable development by approving applications without delay where they accord with the Development Plan (and where relevant, any neighbourhood plan), unless material considerations indicate otherwise.
- 5.33 **Strategic Policy DS2PU: Reducing the impacts of development on Climate Change** sets out that the Council will support development proposals that make a positive contribution towards achieving the Cumbria wide goal of net zero carbon by 2037 where they accord with the Development Plan. It encourages measures such as design to improve energy efficiency and infrastructure to support active and low carbon travel options.
- 5.34 **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. Egremont is listed as one of three Key Service Centres, defined as providing a wide range of services, including convenience and comparison stores, and acting as service hubs for nearby villages. It also sets out that the focus will be (in part) for town centre developments.... and windfall and infill development.
- 5.35 **Strategic Policy DS4PU: Settlement Boundaries** sets out that development within the settlement boundaries will be supported in principle where it accords with the Development Plan unless material considerations indicate otherwise.

- 5.36 **Strategic 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.
- 5.37 **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.
- 5.38 **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.
- 5.39 **Strategic Policy DS8PU: Reducing Flood Risk** and **DS9PU: Sustainable Drainage** seek to ensure that development in the borough is not prejudiced by flood risk by in part directing development to allocated sites outside areas of flood risk where possible and ensuring that new development incorporates sustainable drainage systems where appropriate.
- 5.40 **Policy DS10PU: Soils, Contamination and Land Stability** requires relevant applications to be accompanied by appropriate information to determine whether mitigation and/or remediation or further investigation is required within the relevant categories.
- 5.41 **Policy DS11PU: Protecting Air Quality** sets out that development proposals will only be granted planning permission where they will not give rise to unacceptable levels of air pollution.

5.42 **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.

5.43 **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. Egremont is identified as a Key Service Centre.

5.44 **Strategic Policy R4PU: The Key Service Centres** sets out that development that supports the roles of the Key Service Centres (which includes Egremont), strengthens and diversifies their offer and improves vitality and viability will be encouraged, particularly where it:

- a) Is located within the Town Centre boundaries of the Key Service Centres (Appendix B);
- b) Builds upon and addresses the strengths, opportunities and challenges associated with each town, as set out in Table 11;
- c) Provides convenience and comparison shopping, or range of other services, including leisure provision to serve the settlement and surrounding communities;
- d) Encourages evening and night-time uses that contribute to the vibrancy, inclusiveness and economic vitality of the centres;
- e) Diversifies the range of residential accommodation in the key service centres, including the re-use of vacant floors over shops;
- f) Strengthens and diversifies the towns offer;
- g) Provides improvements to public realm and signage;
- h) Provides enhanced connectivity and town centre coherence, including providing active travel links to public transport hubs;

- i) Provides or enhances car parking provision where appropriate;
- j) Promotes the reuse of Brownfield Land;
- k) Results in the repair and renovation of derelict and historic buildings, particularly where they form part of a gateway into the town centre;
- l) Protects and enhance the special character and appearance of Conservation Areas within town centres designated for their special architectural or historic interest.

5.45 **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.

5.46 **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 300sqm (gross) within 800m of the respective Key Service Centre town centre boundary.

5.47 **Strategic Policy N1PU: Conserving and Enhancing Biodiversity and Geodiversity** outlines the Council's commitment to conserving the borough's biodiversity and geodiversity including protected species and habitats and sets out a mitigation hierarchy. Planning permission will be refused for any development if significant harm cannot be avoided, mitigated or compensated for.

5.48 **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.

5.49 **Policy N13PU: Woodlands, Trees and Hedgerows** sets out that existing trees and hedgerows which contribute positively to the visual amenity and environmental value of their location will be protected. Developers are encouraged to incorporate tree planting and hedgerows into new developments where possible and appropriate.

5.50 **Strategic Policy BE1PU: Heritage Assets** and **Policy BE2PU: Designated Heritage Assets** sets out (in part) that development should preserve or enhance designated heritage assets and their setting. Proposals that preserve or enhance the character or appearance of a Conservation Area, especially those elements which have been identified in a Conservation Area Appraisal as making a positive contribution to its significance will be supported.

5.51 **Strategic Policy CO4PU: Sustainable Travel** 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.
- 5.52 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).
- 5.53 **Policy CO5PU: Transport Hierarchy** sets out that, new developments should promote the following hierarchy of users (highest priority first): a) Pedestrians b) Cyclists c) Public and community transport users d) Vehicles that facilitate car sharing e) All other vehicles. Developments should be designed to maximise the use of transport modes towards the top of the hierarchy whilst always ensuring appropriate access for emergency vehicles. The needs of disabled people ought to be considered at all stages of the transport hierarchy, with appropriate provisions made to improve accessibility.
- 5.54 **Policy CO7PU: Parking Standards and Electric Vehicle Charging Infrastructure** requires proposals for new development 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.
- 5.55 It also sets out that non-residential development should integrate new Electric Vehicle Charging Infrastructure in the form of at least one charging point 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.

National Planning Policy Framework (December 2023)

- 5.56 On 19 December 2023 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 replaces the previous editions.
- 5.57 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.
- 5.58 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

5.59 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 (in part):

“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 this Framework taken as a whole”.*

5.60 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

5.61 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 91 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.”

5.62 ‘Main town centre uses’ are defined within Annex 2 of the NPPF as: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

5.63 Importantly, Paragraph 92 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.

- 5.64 Paragraph 94 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).
- 5.65 Finally, Paragraph 95 of the NPPF states that where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 94, 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

- 5.66 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.
- 5.67 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.
- 5.68 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, then, if no town centre locations are available, to edge of centre locations, and, if neither town centre locations nor edge of centre locations are available, to out of centre locations (with preference for accessible sites which are well connected to the town centre).
- 5.69 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.
- 5.70 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.

- 5.71 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.
- 5.72 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.
- 5.73 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.
- 5.74 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.
- 5.75 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

- 5.76 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 91 of the NPPF (2023) 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 the Key Service Centre of Egremont, located immediately to the southwest of the application site. As the application site is well connected to, and within 300m of this centre, it can be classified as 'edge of centre'. It is therefore necessary to assess any opportunities within the centre of Egremont itself. Whilst not strictly necessary, opportunities within the Key Service Centre of Cleator Moor (being within the Primary Catchment Area) have also been assessed. This is explained further below.

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 Egremont town centre.

Scale and Form of Development

- 6.4 In this instance, the scale and form of retail development is a discount foodstore of 1,855 sq. m GIA (1,408 sq. m net sales) alongside requisite customer car parking (86 spaces), vehicular access roads, servicing area, and associated hard and soft landscaping. This is located on a site of 0.65 hectare (1.6 acres).
- 6.5 The proposals are of a scale and form of retail development identified by ALDI as being required to appropriately serve Egremont and its surrounding communities. Accordingly, it is necessary to define an area of search for sequentially preferable sites based on the specific trading characteristics of a retail development of this size.

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 5-7 minute drivetime from the proposed store in Egremont – which is the customer base that Aldi is intending to serve by virtue of this new store. In this case, an adjusted 7-minute drivetime is appropriate to cover other nearby communities and the rural context. It is also informed by the primary catchment area defined by Aldi for their proposed replacement store at Whitehaven (application reference 4/23/2314/0F1).

Overall, 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 adjusted 7-minute drivetime 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, an adjusted 7-minute off-peak drivetime from the planning application site includes the Key Service Centres of Egremont and Cleator Moor.
- 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 these centres.

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 the defined Egremont and Cleator Moor centres. 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 Aldi require a minimum site area of circa 0.8 hectares (2 acres) and 105+ dedicated parking spaces, and the majority of new sites taken forward will exceed this to ensure that all required development parameters can be appropriately met. In this case, the application site extends to 0.65 hectares (1.6 acres) meaning certain compromises have been necessary compared with minimum new store requirements. This includes car parking where 86 dedicated spaces are proposed.
- 6.13 Notwithstanding the minimum site area requirements, for the purposes of the sequential assessment, the applicant has therefore tested a considerably reduced site area based on that proposed, being **0.65 hectares (1.6 acres)**. Thus, the applicant is clearly demonstrating sufficient 'flexibility' in approach, in-line with Paragraph 88 of the NPPF.

Sequential Site Assessment

- 6.14 Having established the appropriate catchment area, the centres 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**.
- 6.15 The sequential assessment at **Appendix 6** has demonstrated that there are no sequentially preferable development sites within the centres of Egremont and Cleator Moor 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.
- 6.16 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 91 of the NPPF.

7. The Retail Impact Assessment

- 7.1 Paragraph 94 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 (as applicable to the scale and nature of the scheme).
- 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 95 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 assessed against the policies in this Framework taken 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 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 94 of the NPPF requires the preparation of an 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 5-7 minute drivetime from the proposed store in Egremont – which is the customer base that Aldi is intending to serve by virtue of this new store. In this case, an adjusted 7-minute drivetime is appropriate to cover other nearby communities and the rural context. It also informed by the primary catchment area defined by Aldi for their proposed replacement store at Whitehaven (application reference 4/23/2314/0F1). Overall, 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 the adjusted 7-minute off-peak drivetime isochrone from the site as explained above. For context, it also shows the primary catchment in relation to the relevant zones from the 2020 study, being primarily 7 (Egremont) and 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. It has also been informed by Aldi's replacement store proposals in Whitehaven. The area assessed is therefore 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 1,408 sqm. Of this sales area the vast majority will be given over to the sale of convenience goods (80% / 1,126 sqm), with the remainder used for the sale of a purely ancillary range of non-food (comparison) goods (20% / 282 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 1,126 sqm and grown to 2024, the base year, providing a maximum convenience goods turnover of £12.63m. This is anticipated to increase by a small degree by the test year of 2027

(£12.67m) (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 282 sqm and grown to the base year, to provide a maximum comparison goods turnover of £2.16m in 2024 (increasing to £2.29m in 2027).
- 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 2027.

Population (Table 2a)

- 7.18 The base population at 2024 within the study area (being that used for the 2020 study) has been sourced directly from up-to-date Experian Location Analyst data (January 2024 Report). The baseline population has then been projected forward to the test year of 2027 in line with Experian's growth forecasts (utilising the January 2024 data report).
- 7.19 On this basis, the defined study area is identified to contain a resident population of approximately 164,166 people in 2024, which is set to decrease to 163,574 people by the test year of 2027.

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 (January 2024 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 £409.82m convenience goods expenditure within the study area at our test year in 2027.

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 2024 and 2027 (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 which exercise some form of influence over shopping patterns within the catchment area (being those primarily in Whitehaven) continue to trade at levels well in excess of their respective benchmark turnovers. This includes the existing ALDI store in Whitehaven.
- 7.26 Food shopping provision within zone 7 (Egremont) is very limited. Of the provision in Egremont itself, tables 4a and 4b shows that it caters predominantly for top-up food shopping needs. This contrasts with provision within Whitehaven, where the vast majority of main food shopping trips by residents in zone 7 (including Egremont) is undertaken.
- 7.27 These observations carry through into table 5 which shows convenience expenditure flows across zones 6 and 7, and where the following points are worth noting:
- Egremont is the only Key Service Centre within zone 7, therefore the following food shopping trends and habits will most closely relate to this settlement.
 - Retention of convenience expenditure in zone 7 is low (29% / £12.8m).
 - In contrast, there is significant leakage of convenience expenditure from zone 7 (71% / £31m) to other zones. Most of this leakage is to zone 6 (Whitehaven) (89% / £27.7m), where it is mostly spent on main food shopping trips (90% / £25m).
 - Top-up food shopping accounts for most of the convenience expenditure retained within zone 7 (75% / £9.7m), whilst main food shopping only accounts for a limited amount (25% / £3.1m). This is partly a reflection of the lack of choice within Egremont as evidenced above.
 - These trends do not support sustainable shopping habits, with most residents having to leave zone 7 (Egremont) to meet their food shopping needs.
 - They also highlight that Egremont is not fulfilling its role as a Key Service Centre, where the adopted local plan states that the 'type and scale of development' for 'retail and services' within the overall settlement hierarchy (Figure 3.2, page 23) is for a 'range of comparison and convenience shopping' and where the 'emphasis will be on retention of existing provision'. This is evidently at risk reflecting on the above observations, whereas the proposed edge of centre Aldi store can help retention by facilitating linked trips with the existing provision.
 - The above points are further reinforced by the emerging replacement local plan, where the role and function of Key Service Centres within the Hierarchy of Town Centres (page 108 of the 2021 Publication Draft) is for 'convenience and comparison shopping, and a range of other services to serve the settlement and surrounding communities'. In the case of convenience goods shopping, the needs of Egremont and surrounding communities is not being met, meaning its intended role and function is not being fulfilled. This can be remedied, to some extent, by these proposals.

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

- 7.28 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).

- 7.29 As the application proposals are centred around a 'main' food shopping destination (a discount foodstore), it stands to reason that the scheme will divert the vast majority of its trade from equivalent 'main' food shopping destinations (i.e. medium / large mainstream foodstores and discount foodstores). This assumption is entirely consistent with the approach advocated within the Planning Practice Guidance, which confirms that a guiding principle when assessing retail impact is that '*like affects like*' (see PPG Para Ref. 2b-015-20190722).
- 7.30 Given this advice, our approach has been to have greatest regard to the existing 'main' food shopping patterns in the catchment area when allocating the trade diversion of the scheme. We do not propose to provide an exhaustive list of all monetary diversions within this supporting statement as they are clearly outlined in Table 8 of **Appendix 8**. However, we do provide a commentary on the stores / centres from which the majority of the scheme's trade will be diverted below.
- 7.31 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 7 of the study area. 10% is assumed to be drawn from beyond this area (zone 6). This reflects Aldi's proposals to serve residents in zones 6 (Whitehaven) and 7 (Egremont) with a store in each respective settlement.
- 7.32 The detailed trade allocations (Table 7) of our RIA shows that 64.5% / £8.2m would be drawn from the Aldi store in Whitehaven, given its current draw from zone 7 and being the closest discount retailer currently serving residents in Egremont. It is notable that this store is significantly overtrading at present by approximately £17.61m compared with company benchmark and further reinforces the point made above regarding Aldi's proposals for a store in both Whitehaven and Egremont. This overtrading was also evidenced in the 2021 Retail Study.
- 7.33 In addition, 15% / £1.9m and 10.5% / £1.3m is anticipated to be diverted from the Morrisons and Tesco stores respectively in Whitehaven, given their existing draw for main food shopping from zone 7. Both stores are also overtrading and significantly so in the case of Morrisons. This is also evidenced in the 2021 Retail Study.
- 7.34 Other minor diversions are expected to fall on the Coop in Cleator Moor (5.5% / £0.7m) and Egremont (4.5% / £0.57m).
- 7.35 Related convenience goods trading impacts are shown in Table 8. Morrisons is the only foodstore situated in Whitehaven town centre from which any diversions are expected, resulting in a very modest impact on that centre of 4.5%. Even after the diversions, the Morrisons store would continue to trade significantly above benchmark levels.
- 7.36 Any trading impacts on Egremont centre will also be very modest at 6%. Moreover, by retaining more expenditure in the local area, and through the application site's edge of centre location, the proposals are likely to positively benefit all retailers in the centre through increased linked trip generation. Overall, it is considered that the impact will be positive in that the proposals will help Egremont diversify its offer and become a more sustainable centre which attracts a higher number of visits from residents.
- 7.37 In summary, it is expected that trade diversions would result in convenience impacts of 4.5% on Whitehaven Town Centre and 6% on the Key Service Centre of Egremont. Clearly, at these levels, the

proposals would have no significant adverse impact on either centre. This is even more clear when the reality is that these centres also boast comparison retailing offers, meaning any trade diversions would be even further reduced. Given the small scale of floorspace dedicated within the proposals to non-food items, a full analysis of that element of the proposals was not deemed to be proportionate or necessary.

- 7.38 Drawing the above points together in relation to the proposed development's convenience expenditure trade allocation / diversion, Tables 7 and 8 of **Appendix 8** shows that the majority of the scheme's turnover will be diverted from the largest, closest and most popular 'main' food shopping destinations. Logically, this includes a disproportionate effect on the Aldi in Whitehaven, which is significantly overtrading and which the catchment population are already known to use as evidenced by the 2021 Retail Study findings. This is entirely consistent with the PPG's guiding principle that '*like affects like*' when assessing retail impact, as well as Aldi's proposals to serve Whitehaven and Egremont with their own respective stores.

Convenience Expenditure Recovery Projection (Table 9)

- 7.39 Table 9 (**Appendix 8**) shows the significant leakage of convenience expenditure from zone 7 (Egremont). As evidenced above and in the 2021 Retail Study, most of this leakage relates to 'main food' shopping trips being undertaken in zone 6 (Whitehaven).
- 7.40 With a new Aldi store trading in Egremont, expenditure retention will naturally improve from 29% to 54%, with a reduction in leakage from 71% to 46%.
- 7.41 An increase in expenditure retention logically means that more sustainable food shopping trips will take place, whilst the application site's edge of centre location will likely benefit other shops and services in Egremont through increased linked trip generation. This can have a positive impact on centre vitality and viability.
- 7.42 In combination, this will help Egremont fulfil its expected role and function (in the hierarchy of centres) as a more self-sufficient Key Service Centre that provides a wide range of services including convenience shopping.

Vitality and Viability of Egremont and Cleator Moor Key Service Centres

- 7.43 Whilst the preceding section has confirmed that no significant adverse retail impacts would arise in relation to designated centres (being Egremont and Cleator Moor Key Service Centres); 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.
- 7.44 Accordingly, **Appendix 7** of this Statement presents a detailed health check assessment of these centres considering the recognised indicators of vitality and viability.
- 7.45 In summary, there are certain functions of these centres that are performing well, and others (like many such centres) that are performing more modestly. In the case of Egremont, the proposed Aldi store will have a positive impact on vitality and viability through the application site's edge of centre location and resulting increased linked trip generation.

Impact on Existing, Committed or Planned Investment in Centres

- 7.46 To accord with both national planning policy set out within the NPPF and the local policy within the adopted and emerging Plans, this section will consider any impacts on existing, committed or planned investment in centres.
- 7.47 Based on a review of the development plan and emerging documents, as well as the conclusions above in relation to retail impact, there will be no adverse impacts arising on any investment plans identified for either centre. This was also not raised by Copeland Council officers during the pre-application stages. Indeed, in the case of Egremont, any impacts will be positive for the reasons highlighted above.

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.
- 8.3 Egremont is one of three Key Service Centres that are only second to Whitehaven 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.
- 8.4 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.
- 8.5 The site identified within the emerging plan as *Opportunity Site OEG03 'East Road Garage'*. It is described as a 0.62ha site and preferred uses are for "*commercial and employment uses, but residential may also appropriate*". Subject to compliance with other relevant policies within the Local Plan, given the most recent use of the site, surrounding land uses, being an edge-of-centre site, we consider that the emerging site allocation affords considerable support in relation to the principle of a foodstore development in this location.
- 8.6 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 Egremont centre and has not identified any available sites which meets the requirements. The next sequentially preferable type of site for convenience retail would be an edge-of-centre site. The application site is edge-of-centre. Therefore, the application site should be considered the most appropriate available site for a new foodstore.
- 8.7 The proposed development would result in the redevelopment of a longstanding vacant brownfield 'opportunity site'; complies with the sequential approach (as per national, adopted and emerging local plan policy); and demonstrates that the proposed development will diversify the retail offer of Egremont and would not have a significant adverse impact on either, the vitality or viability of Egremont Town Centre (as per emerging policy R8PU). The proposed development should therefore be considered acceptable in principle.

Transportation and Access

- 8.8 Transport and accessibility issues are covered in detail within the supporting *Transport Assessment* and *Interim Travel Plan* prepared by Andrew Moseley Associates (AMA).

- 8.9 The Transport Assessment demonstrates that the development proposals will be accessible by a range of travel modes (including, foot, cycle, bus and private vehicle) from the surrounding residential areas of Egremont as well as Egremont town centre. Furthermore, a range of key facilities and services can be accessed from the site, supporting future employees and linked trips for customers.
- 8.10 As set out earlier in this statement, the development also proposes a dedicated non-motorised user (NMU) footpath to the south-west of the application site adjacent to the pedestrian subway/underpass. The proposed NMU link will connect the application site to the existing footway provision on the A595 roundabout junction and provide a more direct and shorter walking route for both customers and staff when walking to / from Egremont town.
- 8.11 The final detailed design solution for the proposed NMU and interface with the pedestrian subway/underpass remain subject to agreement with National Highways at the point of submission of this application. However, feedback received thus far has been positive and constructive. It is anticipated that through these continued communications with National Highways and Cumberland Council that the detailed design solution will be agreed between all parties during the consideration of the application.
- 8.12 The development proposals have been designed to accommodate traffic and access arrangement in ways which make it safe and convenient for pedestrians and cyclists to move around and complies with appropriate standards relating to servicing and vehicular access.
- 8.13 The proposed upgrade works to the priority-controlled T-junction from Wyndham Place and upgrades to the carriageway width of Wyndham Place along with the formalisation and upgrades to the Wyndham Place / Wyndham Terrace junction and the Wyndham Place / East Road junction are considered appropriate to accommodate the development. The proposed upgrades and site layout allow for customer traffic, and an articulated vehicle can satisfactorily access and egress the site in forward gear. Deliveries would continue to be managed to avoid conflict with other site users.
- 8.14 Whilst the amount of proposed parking on the site is below that set out within the Cumberland Council adopted parking standards "*Cumbria County Council, Development Design Guide, Appendix 1-Parking*", the supporting Transport Assessment demonstrates that the level of proposed parking included within the development would be wholly sufficient to meet the operational requirements of Aldi whilst also allowing for spare capacity to accommodate busier periods.
- 8.15 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. It is anticipated that this, in combination with the edge-of-centre location of the site; cycle parking; and, the proposed NMU will further ensure that parking demand will be met by way of the proposed layout.
- 8.16 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.
- 8.17 In summary, it has been demonstrated that the proposed development will accord with Policy T1, DM22 and Emerging Policies CO4PU, CO7PU, 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

- 8.18 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.
- 8.19 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.
- 8.20 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.
- 8.21 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*.
- 8.22 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. The building, flat-roofed in nature, will benefit from a feature glazed entrance facade facing north 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 elevation adds transparency and lightness to the facade.
- 8.23 The extensive use of glazing on the foodstore's most prominent elevation will offer views into the sales area for passers-by along Wyndham Place and East Road, 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.

- 8.24 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. Accordingly, the scale and massing of the proposed foodstore will be appropriate for its context.
- 8.25 The nearest residential property to the application site – Rivendale, Wyndham Place – sits adjacent the south-eastern boundary of the site. The rear elevation of the foodstore and the side elevation of Rivendale would be separated by 8.5m which is proposed to include provision of a 2m high close-boarded fence and landscaping. There are no windows proposed on the southern elevation of the foodstore and 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. Furthermore, the foodstore being located to the north of Rivendale would ensure that the development would in no way result in overshadowing of said dwelling.
- 8.26 In addition, the application is also accompanied by an Acoustic Report which considered potential noise impact. It concludes that the noise from the operational development is not likely to have a detrimental effect on the existing amenity of the closest residents for daytime or nighttime operations. The proposals are not therefore considered to be detrimental to the amenity of this or any other residential properties within proximity of the development.
- 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 palate 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 as a gateway to Egremont.
- 8.29 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.

Heritage Statement

- 8.30 As well as the adopted and emerging Local Plans, the Conservation Area Design Guide SPD (December 2017) defines the boundaries of the Conservation Area and the location of listed buildings (extract below at figure 7).

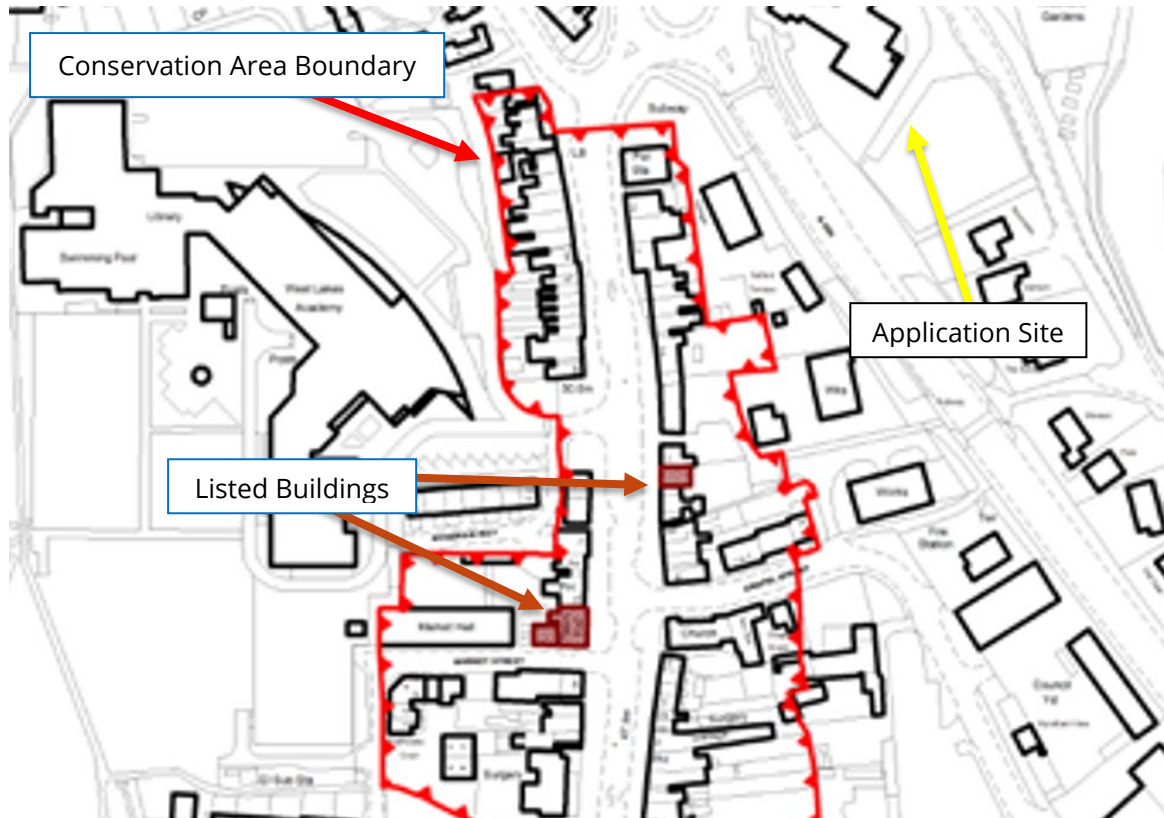


Figure 7: Extract from Conservation Area Design Guide SPD, December 2017 (Source: Cumberland Council)

- 8.31 The SPD also includes a 'Conservation Area Description' of Egremont within the supporting text and highlights that the main features of the Egremont conservation area are on the Main Street, which runs on a north / south axis leading to the Market Place close to Egremont Castle, which is adjacent to the southern boundary of the town centre.
- 8.32 The application site is located outside of the boundaries of the Egremont Conservation Area by circa. 50 metres and is further visibly separated by intervening land uses and development - most significantly the A595 Egremont Bypass and associated roundabout and subway crossing. The application site is also separated by a surface level car park located on the corner of Main Street and the A595; existing commercial development at Salford Terrace; and, a mature landscaping strip located on either side of the A595.
- 8.33 As demonstrated within figure 7 above, there are no listed buildings located within the northern section of the conservation area boundary. Neither are there any listed buildings immediately adjacent the application site or on intervening land located between the application site and the Egremont conservation area boundary itself. The proposals would therefore at no time be viewed within the direct context of any listed buildings, or indeed the conservation area itself.

- 8.34 The proposed foodstore (which is single storey) would be located towards the south-eastern section of the application site, and would be largely screened from view from the west due to the existing mature landscape strips either side of the A595, as well as variations in ground levels between the application site and the A595 itself.
- 8.35 The northern elevation of the foodstore - which would potentially be the only part of the development visible from the edges of the conservation area boundary – includes significant levels of glazing and the main entrance to the foodstore. This would create a high quality visually attractive modern form of development that complements the surrounding buildings and reflects their scale and massing, and more broadly the gateway to Egremont town centre itself.
- 8.36 Indeed, the proposed demolition of the existing vacant buildings - which are located on the more visible northern section of the site – and replacement with attractive hard and soft landscaping and boundary treatment within the context of a modern foodstore development would represent a significant improvement in the overall appearance of the site.
- 8.37 The development proposals are not therefore anticipated to have a detrimental impact upon the conservation area or any identified heritage assets.
- 8.38 We therefore maintain that the development proposals are in accordance with the policy intent and outcomes set out within relevant conservation area and heritage related policies and would be wholly in accordance with the aims and objectives of the SPD; adopted and emerging development plan policies Policy ENV4: Heritage Assets; Strategic Policy BE1PU: Heritage Assets; Policy BE2PU: Designated Heritage Assets; and NPPF.
- 8.39 We would refer the reader to the accompanying Design & Access Statement for additional consideration of design related matters.

Residential Amenity, Noise and Air Quality

- 8.40 The NPPF states *“Planning policies and decisions should also 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.”*
- 8.41 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.
- 8.42 The application is accompanied by an Acoustic Report which considered potential noise impact. 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. It concludes that the noise from the operational development is not likely to have a detrimental effect on the existing amenity of the closest residents for daytime or nighttime operations.
- 8.43 The Air Quality Assessment which accompanies the application provides a qualitative assessment of the potential impacts on local air quality from construction phase activities. It concludes that

appropriate mitigations implemented as part of a conditioned Construction Management Plan would ensure that any impacts on air quality would not be significant.

- 8.44 An assessment was also undertaken to determine the impact from the development in relation to generated traffic on the local road network. The assessment concludes that the Proposed development is expected to result in negligible impacts on NO₂, PM₁₀ and PM_{2.5} concentrations and that the residual effects are predicted to be not significant in accordance with IAQM guidance. As such, the assessment does not recommend any additional mitigation measures during the operational phase of the development.
- 8.45 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

- 8.46 Adopted Local Plan policies ST1 and ENV3 and emerging Local Plan Strategic Policy N1PU relate to Biodiversity and Geodiversity outlined the Council's commitment to conserving the borough's biodiversity and geodiversity including protected species and habitats.
- 8.47 A *Preliminary Ecological Appraisal & Preliminary Roost Assessment Report* (January 2024) has been prepared by Total Ecology in support of the planning application. The findings of the report confirm that the site has limited ecological value and no evidence of protected species were identified on any part of the site.
- 8.48 The application proposals are also accompanied and informed by detailed landscaping plans, which as well as creating an attractive setting for the development will positively contribute enhancing biodiversity and the ecological value of the site.
- 8.49 In addition, the supporting *Biodiversity Metrics* report (January 2024) prepared by Total Ecology confirms that the resulting in a biodiversity net gain of 690.56%, which would be wholly in accordance with policy N3PU of the emerging Local Plan relating to biodiversity net gain.
- 8.50 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

- 8.51 Policy DM28: Protection of Trees and emerging Policy N13PU: Woodlands, Trees and Hedgerows requires an arboricultural assessment as to whether any trees are worthy of retention and protection.
- 8.52 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.

- 8.53 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.
- 8.54 A site visit was undertaken in November 2023 and all trees on and directly adjacent to the Site were surveyed and categorised. 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.
- 8.55 The reports highlight that only one small shrub group (Group 3) would be removed as a result of the development proposals and that they are of low quality. All other trees of significance are to be retained and protected throughout the construction period.
- 8.56 As set out earlier, the proposals also include provision of a detailed landscaping scheme which includes a selection of soft landscaping to be provided throughout the site. Given the low quality and limited quantity of the lost shrubs in a single small area of the site, it is considered that the proposed replacement with landscaping in areas of the site will be of a higher quality and would be managed throughout the lifetime of the development.
- 8.57 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. It is therefore concluded that the proposals align with the aims of Policy DM28 and N13PU.

Flood Risk and Drainage

- 8.58 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.
- 8.59 Policy DS9PU: Sustainable Drainage seeks that new development incorporates sustainable drainage systems where appropriate.
- 8.60 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.
- 8.61 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.
- 8.62 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 the development in line with the requisite standards. In terms of the Site's surface water drainage, the proposals incorporate SuDs and are not anticipated to exacerbate flooding elsewhere. As the proposed development will 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.
- 8.63 We would refer the reader to the Flood Risk and Surface Water Drainage Assessment and supporting package of drawings for further information in this regard.

Ground Conditions

- 8.64 The application is accompanied by a Phase 1 Geo-Environmental Assessment (September 2021) prepared by 3E Consulting Engineers and a Ground Investigation Report prepared by Hydrock (December 2023). The reports were prepared to provide an initial assessment of potential geotechnical and environmental conditions and constraints at the site to assist with providing an assessment of potential abnormalities associated with the site and to aid with the design of the development.
- 8.65 Although recommending further investigative and likely remediation works to be undertaken at the appropriate time, the findings of the reports support the application proposals and do not identify any significant constraints to redevelopment of the site.
- 8.66 The proposals should therefore be considered in compliance with the relevant criteria outlined within the adopted and emerging Local Plan with regards to land contamination and stability.

Security and Designing-out-Crime

- 8.67 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.
- 8.68 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

- 8.69 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, heritage, transportation, flood risk, ecology, air quality, security and sustainability; as well as the relevant, corresponding policies contained within the NPPF.
- 8.70 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 *"Demolition of existing buildings and erection of a discount food store (Use Class E), alterations to vehicular and pedestrian access, provision of car and cycle parking, servicing area, hard and soft landscaping and associated works"*.
- 9.2 The development proposals will see a significant vacant brownfield site developed into an attractive, modern food store with convenient access options and high-quality landscaping.
- 9.3 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. Added to this, it is important to acknowledge that the foodstore will contribute a range of good quality, flexible retail positions which are within an edge-of-centre location and within walking distance from the surrounding residential area. A discount foodstore of the scale proposed would typically employ around 40 members of staff.
- 9.4 Finally, the scheme is eminently deliverable, with ALDI targeting construction within 18-months of obtaining planning permission.

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 Egremont, 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 5+6** of this report) has demonstrated there are no sequentially preferable development sites within or on the edge of Egremont Town Centre.

Retail Impact

- 9.9 Section 7 of this report has demonstrated that the trading effects of the retail proposals will not give rise to any adverse retail impacts on designated centres within the primary catchment area, namely Egremont Town Centre.

Other Planning Policy Matters

- 9.10 Section 8 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, heritage, 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 proposed ALDI discount foodstore will play an important role in enhancing consumer choice and competition within Egremont.
 - 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;
 - 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;
 - The proposed development will make use of a previously developed brownfield site, which is wholly supported in both national and local planning policies.

- 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 around £6m into the local economy;
- The proposed development is not speculative. It will be developed and operated by ALDI, as part of their investment plans to deliver a new store to Egremont, thereby further improving convenience retailing choice and competition within the area. As such, they carry their own economic credentials, in the form of making a substantial capital investment into Egremont, providing new jobs (and indirectly supporting jobs elsewhere through their network of suppliers), Gross Value Added (GVA) to the local economy during the operational phase, supporting construction related jobs and making efficient use of vacant brownfield site.
- 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').

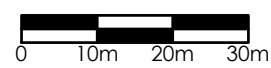
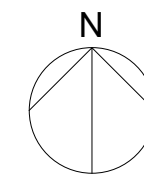
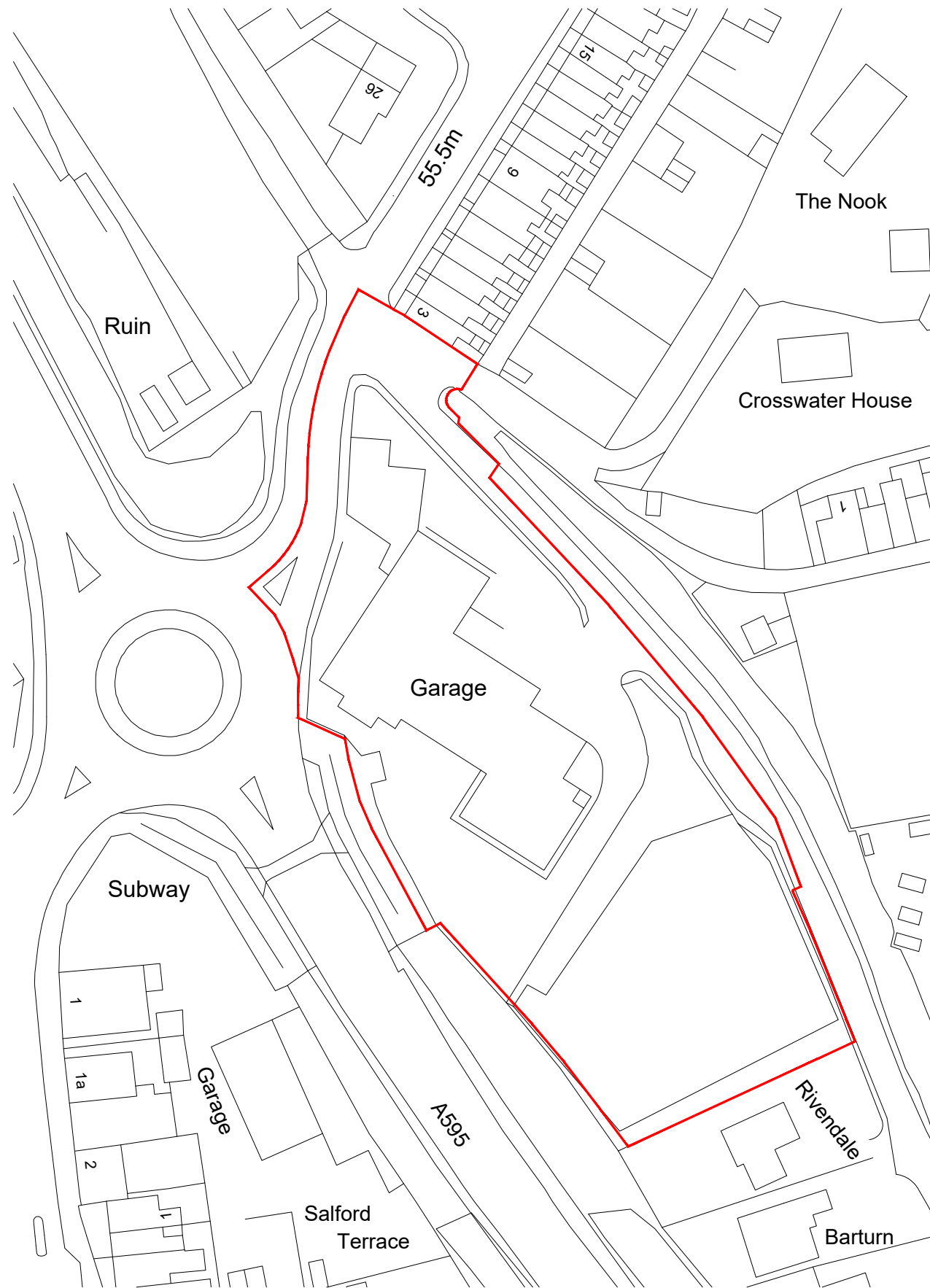
9.14 Overall, it has been demonstrated that the proposed foodstore development accords with the key policies of the Development Plan, as well as the relevant policy tests contained within the NPPF. The Applicants' position is therefore that planning permission should be granted on this basis.

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. There are material considerations of significant weight for the decision making that indicate that the planning application should be supported. We therefore respectfully request that Cumberland Council approve the proposed development.

Appendix I

Location Plan

REV	DATE	DESCRIPTION	DRW	CHK
P01	2024-01-23	First Issue	AdeL	MJ



Client
Aldi Stores Ltd.

Project Title
Aldi - Egremont

Project Address
**Wyndham Terrace
Egremont**



Drawing Title
Location Plan

Job No.	Originator	Zone	Level	Type	Role
0541	PA	XX	00	DR	A
System Classification		Drawing No.	Suitability	Revision	
PM_40_50-21-0001		S4	P01		
Drawn	Checked	Date	Scale	Size	
AdeL	MJ	2024-01-08	1:1000	A3	

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Appendix II

Retail Study Area Plan











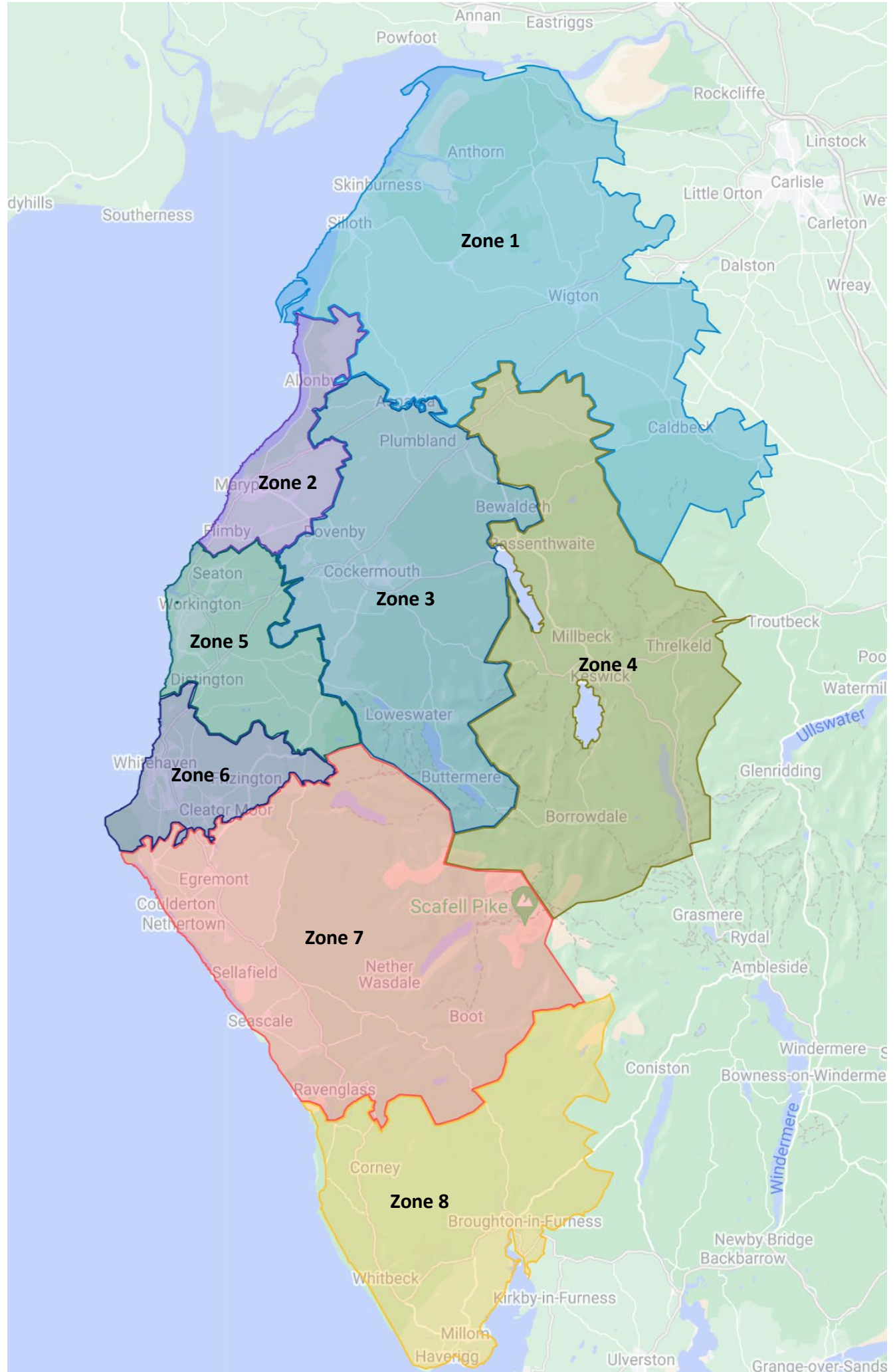
Proposed Aldi Foodstore – Land at East Road & Wyndham Place, Egremont

**AVISON
YOUNG**

Appendix 2 – Study Area Plan by zone

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 East Road & Wyndham Place, Egremont

Appendix 3 – Zones 6 & 7 from Retail Study Area Plan with Primary Catchment Area for proposed ALDI

Key



Proposed Aldi Foodstore

Land at East Road & Wyndham Place, Egremont



Zone 6

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



Zone 7

(Postcodes of CA19 1, CA20 1, CA21 2, CA22 2, CA23 3, CA27 0)



Primary Catchment –

Adjusted 7 Minute Drivetime



Appendix IV

Egremont Town Centre and existing foodstores



Proposed Aldi Foodstore – Land at East Road & Wyndham Place, Egremont

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

Key



Proposed Aldi Foodstore

Land at East Road & Wyndham Place, Egremont



Primary Catchment - 7 Minute drivetime



Egremont Town Centre Boundary

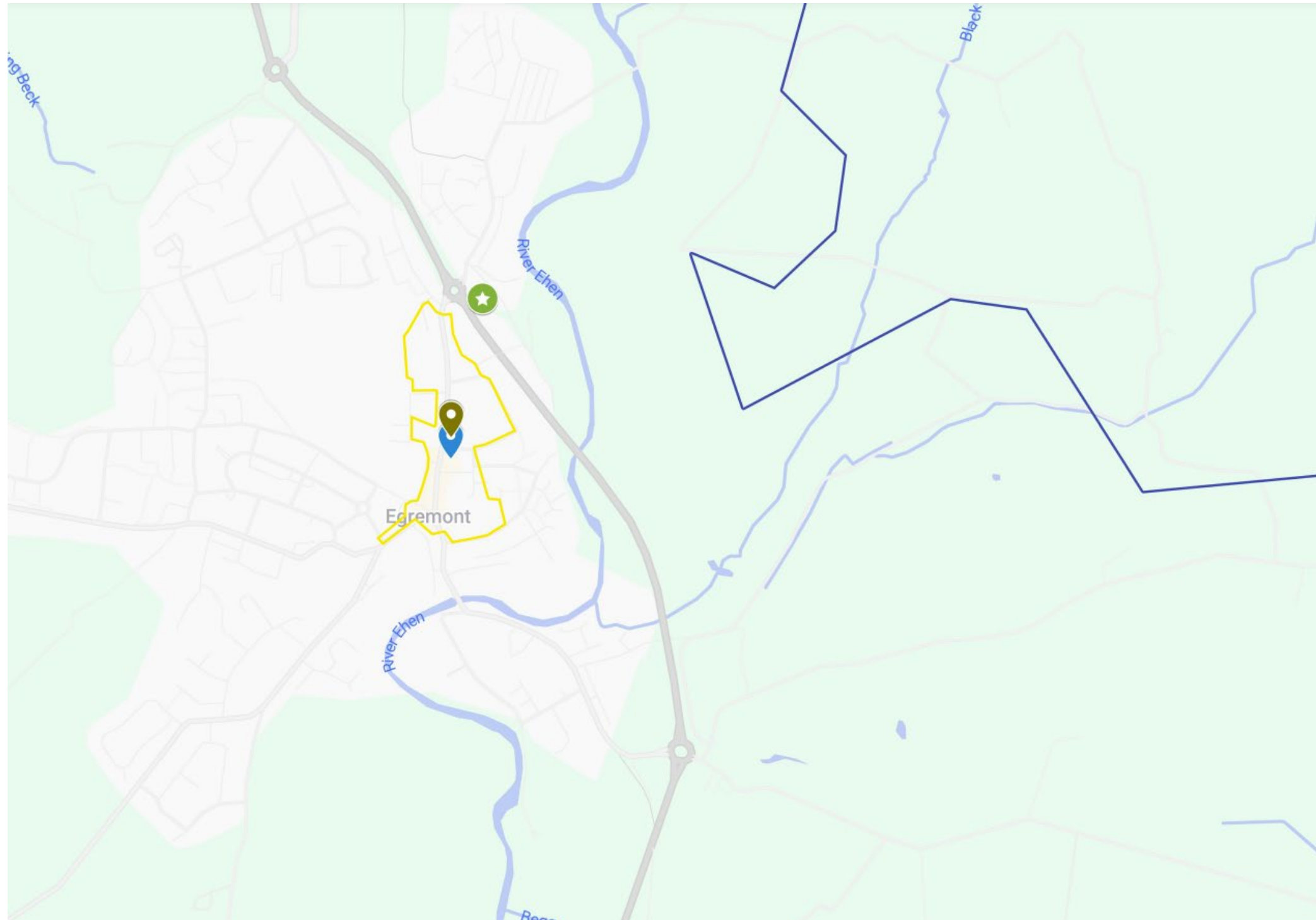
Retailers



Co-op



Heron Foods



Appendix V

Sequential Assessment Site Plan



Proposed Aldi Foodstore - Land at East Road & Wyndham Place, Egremont

Appendix 5 - Sequential Assessment Site Plan

**AVISON
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Key



Proposed Aldi Foodstore

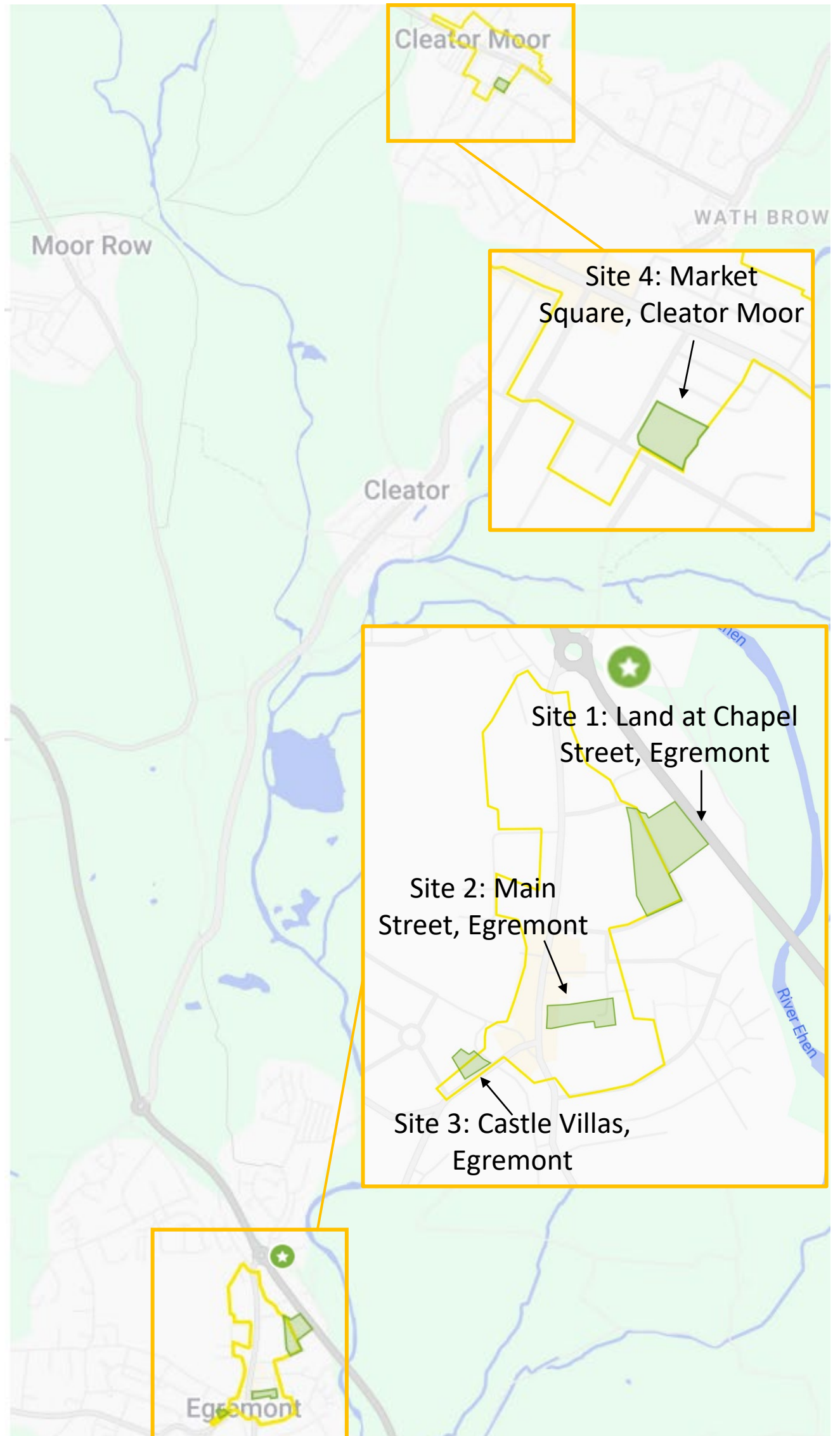
Land at East Road & Wyndham Place, Egremont



Egremont Town Centre Boundary



Cleator Moor Town Centre Boundary



Appendix VI

Sequential Assessment Site Proformas

Appendix 6 - Sequential Assessment – Detailed Proformas

Site 1 – Land at Chapel Street, Egremont


Satellite Image

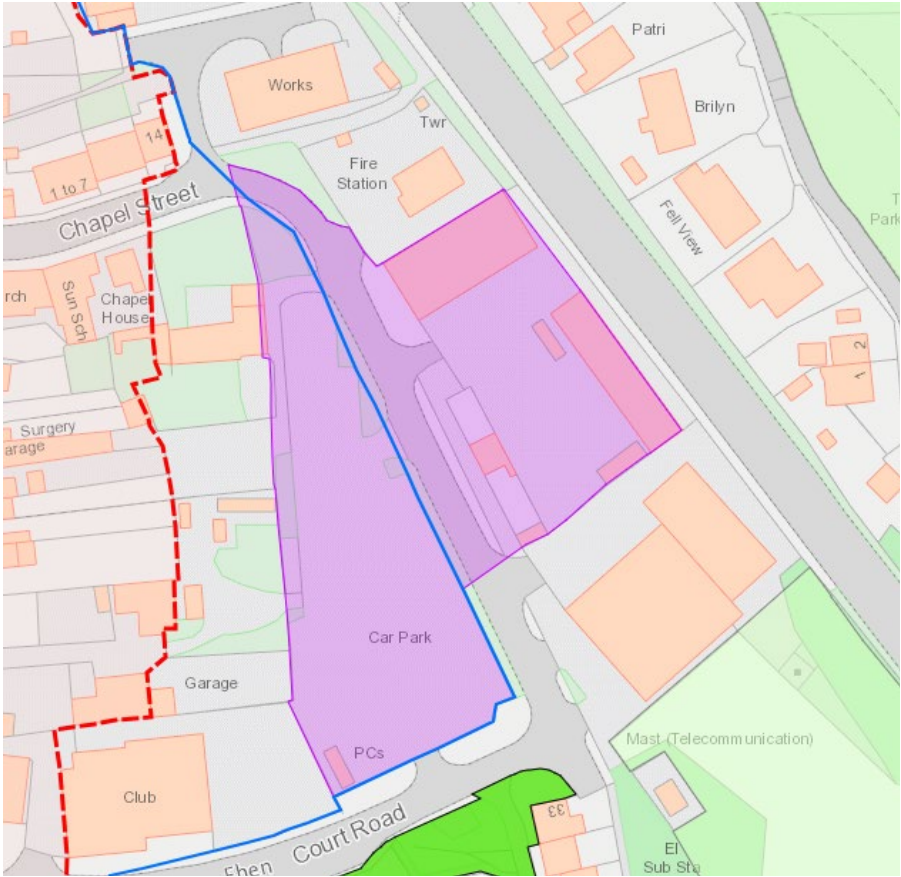


Site Photos

Existing site – looking
east from Chapel
Street



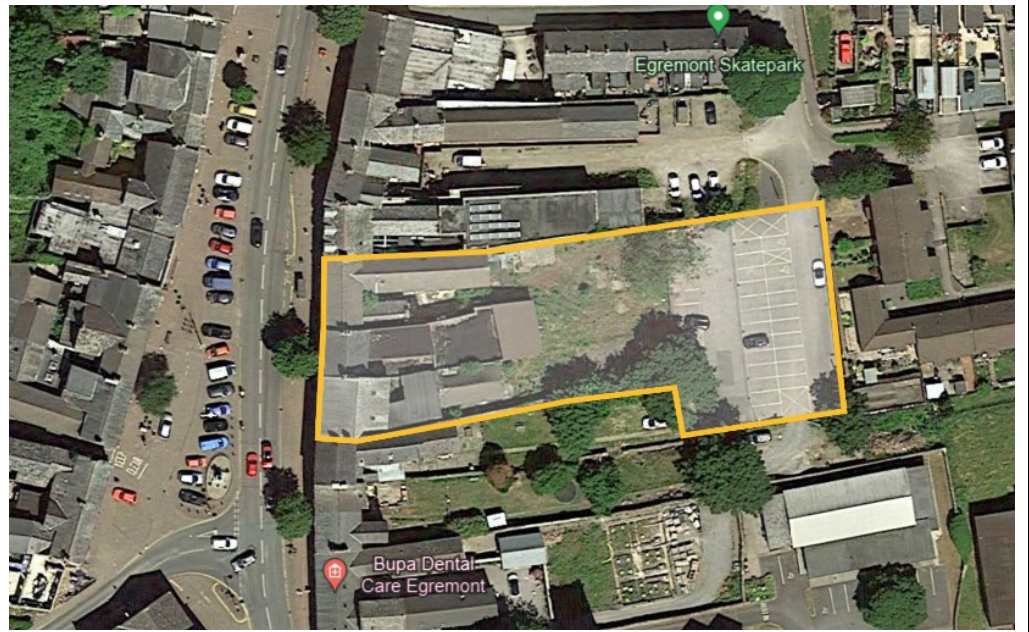
<p>Site Photos</p> <p>Existing site – looking south east from Chapel Street</p>	
<p>Site Size</p>	<p>The site extends to 0.83 hectares.</p>
<p>Existing Uses</p>	<p>The site is currently occupied by a mix of existing business uses, a private dwelling and a surface level car park. At the time of inspection, the car park was occupied by a fair.</p>
<p>Neighbouring Uses</p>	<p>The site is predominantly surrounded by commercial uses including further business uses to the south and north (as well as a fire station), and those within Egremont town centre to the west. A private dwelling is located within the centre of the site. The A595 Egremont by-pass marks the eastern boundary of the site.</p>
<p>Relationship with Nearest Centre</p>	<p>The site straddles the defined boundary of Egremont town centre which runs north-south along Chapel Street. In the adopted local plan, it is allocated as part of 'Sites Close to Town Centres' where such sites are described as having been "<i>identified close to the town centre boundaries of Whitehaven and Egremont</i>". This would suggest that the site occupies an 'edge of centre' location with reference to the sequential test, however for the purposes of this assessment it has been treated as a town centre site.</p>
<p>Development Plan Allocation</p>	<p>The adopted local plan allocates the site as an 'Employment Opportunity Site' under policy EMP 3 and with reference 'EEO1 Land at Chapel Street'. See proposals map extract below.</p> <p>Allocation of the site for development has been carried forward into the emerging local plan as 'Opportunity Site' OEG01 and where all town centre uses are 'suitable/preferred'.</p>

	
<p>Planning Permissions / Current Development Proposals</p>	<p>Various applications have been granted associated with the commercial land uses present on site.</p>
<p>Suitability</p>	<p>At 0.88 hectares, the site is of a sufficient size to accommodate the scale and form of the development proposed.</p> <p>The site straddles the town centre boundary. It is allocated as part of ‘Sites Close to Town Centres’ where such sites are described as having been “<i>identified close to the town centre boundaries of Whitehaven and Egremont</i>”. This suggests that the site occupies an ‘edge of centre’ which is no more suitable, in sequential terms, than the application site. However, as part of the site is located within the town centre (compared with the application site, which is not), and in the interests of presenting a robust assessment, it is considered suitable with reference to its location.</p> <p>The site is bisected by Chapel Street, being a publicly adopted road. This essentially creates two sites, being the car park on the west of Chapel Street and existing business uses and a private dwelling on the east. The overall site configuration is such that the ALDI store could only be accommodated on the eastern part of the site, with parking logically to the west as currently laid out. However, without the closure of this section of Chapel Street, and bringing it into ALDI’s control, the site would be inappropriate from an operational and customer safety perspective. The presence of a fire station immediately to the north also suggests that any changes to Chapel Street would not be acceptable. Indeed, all of Chapel Street and Ehen Court Road (which it joins), has double-yellow lines. In this regard, the site is not suitable.</p>

	<p>Furthermore, the site occupies a 'backland' location, without any frontage or profile to Main Street in the town centre. Whilst it has frontage to the A595 Egremont bypass, this is screened and set down in terms of levels. Vehicular access into the site is also restricted at this location.</p> <p>Reflecting on the above, this site can therefore be dismissed as <i>'unsuitable'</i>.</p>
Availability	<p>Most of the site is in active use, comprising existing businesses (including B&K Mayson Contracting Services Ltd), a private dwelling and an operational car park. No parts of the site were being marketed at the time of inspection and beyond this, its availability is unknown.</p> <p>We understand that the Council control the car park. Allocation of the site for development in the local plan may therefore suggest that this part of the site could be made available. However, the eastern part of the site is occupied by an operational business and a private dwelling, with the latter located in the centre of the site. Overall, this suggests that the site is not available.</p>
Conclusions	<p>In conclusion, the site is not <i>'suitable'</i>, and it may also not be <i>'available'</i>.</p>

Site 2 – Main Street, Egremont


Satellite Image

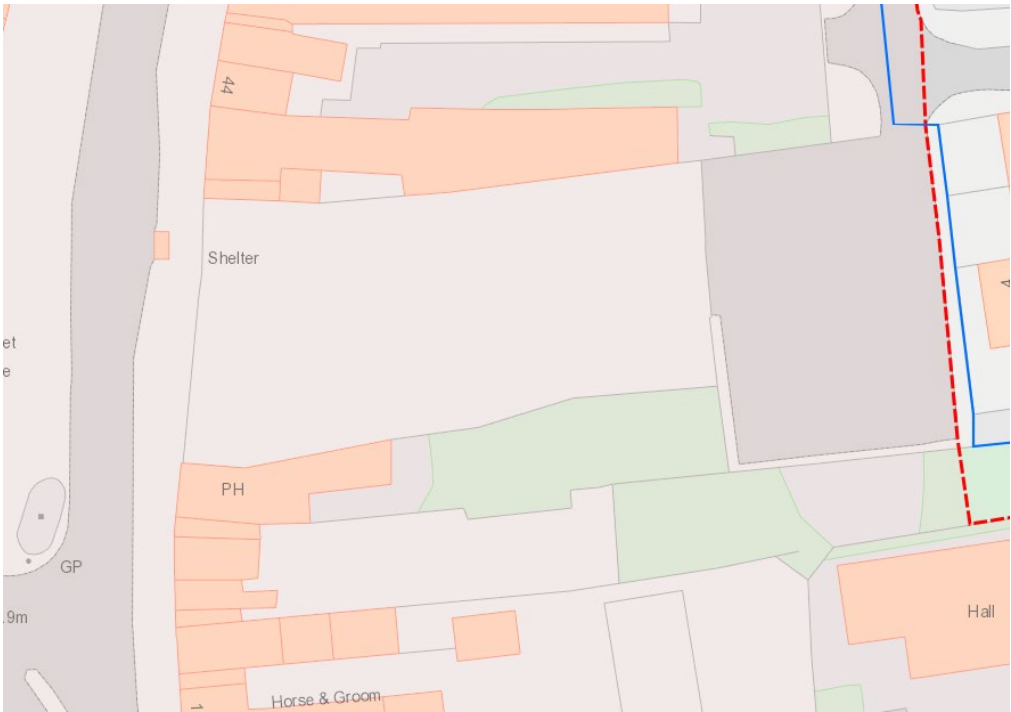


Site Photo

Existing site – looking east from Main Street




<p>Site Photo</p> <p>Existing site – looking west from car park</p>	
<p>Site Size</p>	<p>The site extends to 0.27 hectares.</p>
<p>Existing Uses</p>	<p>The central and western part of the site is currently vacant land. Satellite images show that it was previously occupied by properties fronting Main Street and which have since been demolished. The eastern part of the site is a surface level car park</p>
<p>Neighbouring Uses</p>	<p>The site is located within Egremont town centre. Surrounding uses are a mix of commercial and residential.</p>
<p>Relationship with Nearest Centre</p>	<p>The site is located within Egremont town centre.</p>
<p>Development Plan Allocation</p>	<p>Part of the site is allocated in the emerging local plan as ‘Opportunity Site’ OEG02 Former Red Lion PH (0.04 hectares), where all town centre uses are ‘suitable/preferred’. The entire site is located within Egremont town centre.</p>


	
<p>Planning Permissions / Current Development Proposals</p>	<p>We are unable to establish planning history for this site.</p>
<p>Suitability</p>	<p>At 0.27 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 can therefore be dismissed as <i>'unsuitable'</i> on this basis.</p>
<p>Availability</p>	<p>The site was not being marketed at the time of inspection. Press reports from 2021 state that the part of the site occupied by the former Red Lion PH had been acquired for redevelopment. Beyond this, its availability is unknown.</p>
<p>Conclusions</p>	<p>In conclusion, the site is not <i>'suitable'</i> and it may also not be <i>'available'</i>.</p>

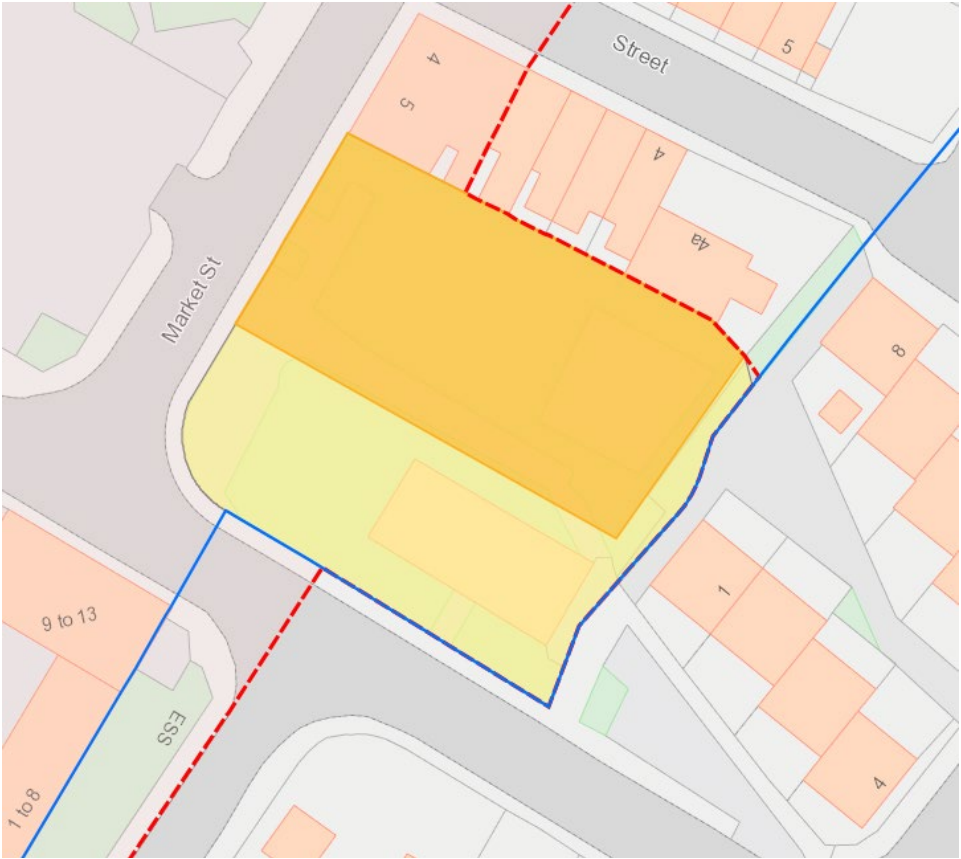
Site 3 – Castle Villas, Egremont



<p>Site Size</p>	<p>The site extends to 0.11 hectares.</p>
<p>Existing Uses</p>	<p>The site is currently vacant land. It was previously occupied by a cinema.</p>
<p>Neighbouring Uses</p>	<p>Surrounding uses are mostly residential.</p>

Relationship with Nearest Centre	The site straddles the adopted local plan Egremont town centre boundary. More than half of the site is located within the boundary and it has therefore been assessed as a town centre site.
Development Plan Allocation	<p>The adopted local plan allocates the site for housing under H17 Old Castle Cinema.</p> 
Planning Permissions / Current Development Proposals	Planning permission has been granted for residential development at the site.
Suitability	<p>At 0.11 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 can therefore be dismissed as '<i>unsuitable</i>' on this basis.</p>
Availability	The site was not being marketed at the time of inspection. Beyond this, its availability is unknown.
Conclusions	In conclusion, the site is not ' <i>suitable</i> ' and it may also not be ' <i>available</i> '.

Site 4 – Market Square, Cleator Moor	
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 currently part vacant and part occupied by a single storey building in commercial use.
Neighbouring Uses	Surrounding uses are a mix of commercial and residential.

Relationship with Nearest Centre	The site is located within Cleator Moor town centre.
Development Plan Allocation	<p>The adopted local plan allocates the site as a 'Town Centre Development Opportunity Site' CTC1 Market Square. Part of the site</p> 
Planning Permissions / Current Development Proposals	The adopted local plan identifies the northern part of the site as benefiting from planning permission for housing (site H55).
Suitability	<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 can therefore be dismissed as '<i>unsuitable</i>' on this basis.</p>
Availability	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.
Conclusions	In conclusion, the site is not ' <i>suitable</i> ' and it may also not be ' <i>available</i> '.

Appendix VII

Egremont Town Centre Health Check Assessment

Egremont Key Service Centre

Health Check Assessment (September 2023)

Centre Overview

Egremont is a market town in Cumbria within the newly formed Cumberland Council administrative area. It is situated just outside the Lake District National Park, eight kilometres south of Whitehaven and on the River Ehen. The town has a long industrial heritage including dyeing, weaving and iron ore mining. It had a population of 7,444 in 2001, increasing to 8,194 at the 2011 Census. The remains of the Norman castle, built in the 12th century, are situated at the southern end of Main Street near Market Place.

Egremont Key Service Centre boundary broadly runs north-south along Main Street stretching from the junction at the roundabout access to the A595 in the north and to Market Place in the south, as which point Main Street forks into Castle Villas and South Street. The boundary includes some land and buildings behind Main Street to the east, including a church and several car parks; in addition to several vacant buildings heading south west on Castle Villas.

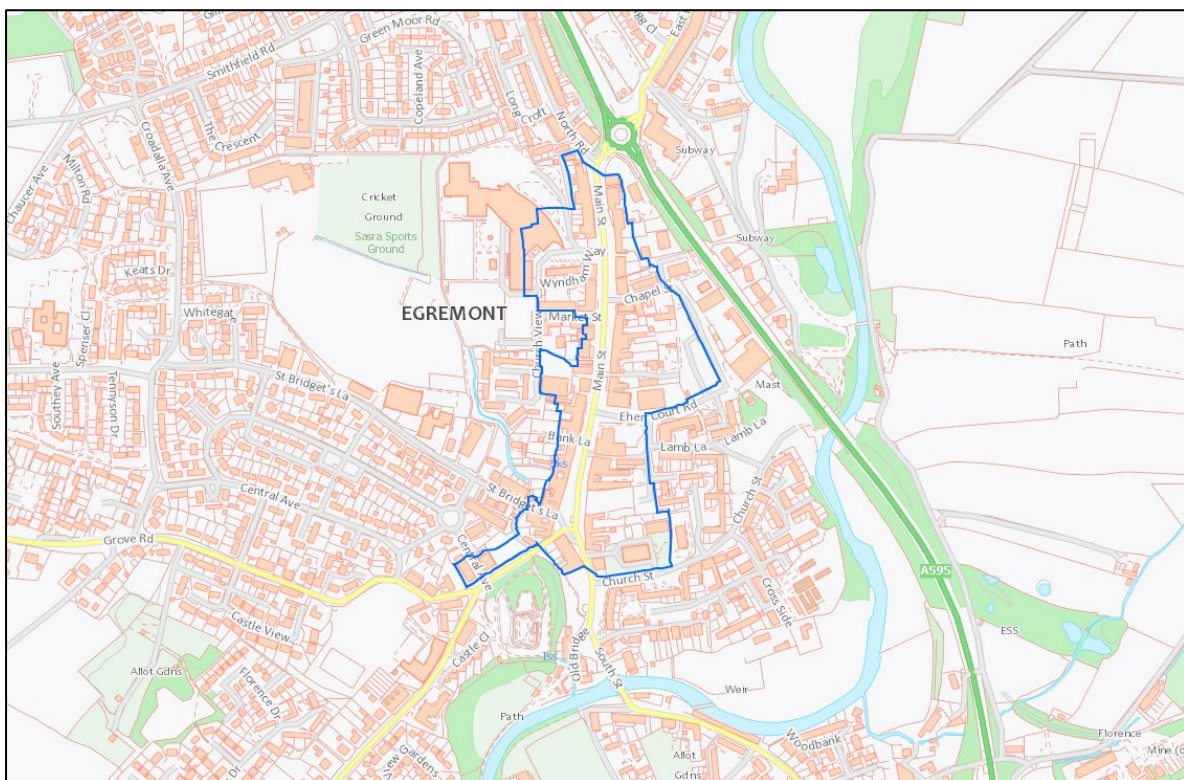


Figure 1: Egremont Key Service Centre Boundary (Copeland Local Plan 2013-2028 Core Strategy Policies Map)

The shops and services located in Egremont are defined as a 'Key Service Centre' through Policy ER7 'Principal Town Centre, Key Service Centres, Local Centres and other service areas: Roles and Functions' of the adopted Local Plan. How 'Key Service Centres' should be managed is described in more detail in Policy ER9 'The Key Service Centres, Local Centres and other smaller centres'. These policies are set out in the *Copeland Local Plan 2013-2028 Core Strategy and Development Management Policies*, which was adopted in 2006. The Council is in the process of preparing a new Local Plan which is at an advanced stage, however for the purposes of this report,

the adopted planning framework will be used.

Diversity of Uses

Convenience Goods

As Table I on the following page shows, Egremont's convenience retailing sector accounts for just 6.58% of all retail units located in the Key Service Centre, which is lower than the national average of 9.3%. The Key Service Centre contains two relatively small supermarkets, in the form of the Co-Operative Food Store and Heron Frozen Food. The Co-Operative offers a limited product range given its limited scale and caters primarily for top-up shopping. Heron Frozen Foods focusses primarily on frozen goods and carries a smaller range of dried and household goods and very limited fresh produce. In addition to these food stores, Egremont also offers a McColl's convenience store including Post Office services, R. Wilson Butchers and The Original Factory Shop, which carries dried and cupboard food products and household goods.

In terms of further observations on the Centre's convenience retail offer, the 'Co-Op' appeared to be relatively popular and well-used by the local community. The Co-Op benefits from a car park offering circa 40 car parking spaces to the rear of the store. Beyond this, the convenience offer within the centre is limited and overall caters only for top-up shopping with limited access to fresh produce.



Figure 2: Co-op Food Store in Egremont Centre, September 2023

Comparison Goods

Our visit to Egremont Key Service Centre recorded 15 commercial units selling comparison goods, equating to 19.74% of all shop units within the Centre. This fell short of the national average position of 27.1% but is entirely

normal for a centre of this scale, which is evidently focussed on serving the day-to-day 'top-up' food shopping and service needs of the surrounding residential community. Comparison goods units present within the centre included charity shops, homeware shops, a florist and a health and beauty retailer (Boots).

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

Use Type	Number of Units (September 2023)	
	No.	Egremont Key Service Centre %
Convenience	5	6.58%
Comparison	15	19.74%
Service	35	46.05%
Miscellaneous	8	10.53%
Vacant	13	17.11%
Total	76	100.00%

Leisure, Retail and Business Service Uses

35 Service Units were recorded during our site visit in September 2023. This equated to 46.05% of all shop units within the Centre, just below the national average position of 49.6%. The proportion of service units is not unsurprising, given the role and function of Egremont as a Key Service centre which caters for the 'day-to-day' needs of the local residential catchment area. Services uses (leisure, retail and business) therefore evidently play a very important role in the overall health of Egremont Key Service Centre as the dominant use type. The centre offers a wide range of leisure, retail and business services that serve the surrounding population. This includes several barbers and salons, beauticians, hot food take-aways, and betting offices, among other uses.

Vacant Units

A vacancy rate of 17.11% was identified which is marginally higher than the current national average position of 14.1% and represents 13 vacant units within the centre. The vacant units comprise former public houses, a restaurant, banks, offices and shop units. These units are located throughout the centre but concentrated more heavily towards the very south of Main Street where footfall is more limited.

In summary, Egremont has a vacancy rate broadly in line with the national average. These vacancies do have a perceptible minor detrimental impact on the overall health or aesthetic of Egremont, although there are proposals to redevelop an unsightly gap site on Main Street (see Figure 3 below) to provide new housing and commercial units.

Other Miscellaneous Uses

Alongside these categorised units, we also recorded eight additional miscellaneous units serving Egremont Key Service Centre, which equates to 10.53% of all units within the centre. Significant unit categorised as miscellaneous within the Centre include a veterinary surgery, dental surgery and two places of worship, which offer invaluable facilities for people within the surrounding residential areas. Given the proximity of these facilities to other shops and services within Egremont, it can be expected that users of these facilities would frequently use other services within the Local Centre.

Balance Between Independent and Multiple Stores

Egremont comprises a total of 76 units, of which seven are occupied by national multiple retailers (Boots, Coral, Betfred, McColl's, Co-Op, Greggs, Age UK, Cohens). Discounting vacant units, of which there are thirteen, multiple

stores comprise 12.7% of the centre's retail offering – which is considered to represent a healthy proportion for a centre of this scale, role and function.

Accessibility

The Local Centre is primarily located along Main Street which connects at the northern end to the A595 which is the main arterial road connecting West Cumbria from north to south and provides access to a number of other market towns and villages in the region. As a result, the centre is highly accessible by car. Main Street was particularly congested at the time of our visit as it was mid-afternoon and the end of the school day.

Free parking facilities are offered to the rear of the Co-Op and there were various opportunities for on-street parking and various Council-run car parks which are chargeable.

The surrounding area is predominantly residential in nature. Therefore, the centre has an extensive walk-in catchment. The centre is also pedestrian-friendly, with wide pavements and a dedicated pedestrian crossings present.

Egremont is accessible by bus, and benefits from three bus stops – Police Station, West Lakes Academy and Red Lion Hotel. Police Station and Red Lion Hotel are southbound and West Lakes Academy is northbound. All bus stops are served by only one bus, the no. 30 service, operated by Stagecoach, which runs every 30 minutes to Whitehaven and Maryport to the north.



Figure 3: Bus Stop and Vacant Site to the southern end of Main Street, September 2023

Pedestrian Activity

Pedestrian activity was perceived to be relatively high within the Centre. The centre is in a predominately

residential area, enabling many local residents to walk to the centre, as opposed to using other means of transport.

Environmental Quality

From Avison Young's on-site observations, Egremont has a generally good environmental quality. The centre is clean and tidy, some street planting and seating areas are present – particularly around Market Place to the south. The centre also benefits from a number of mature trees both on and adjacent to its pavements. Pavements are noticeably wide in the centre and several traffic lights along Main Street offer safe and straightforward controlled pedestrian crossing points. Both of these factors aid the environmental feel and user experience of the centre. Overall, the environmental quality of the centre is not considered to have impacted negatively on its overall vitality or viability and indeed is generally positive.

Summary / Conclusions

Aside from some largely derelict, vacant spaces toward the south of the high street, Egremont is described as offering a diverse mix of uses and a good level of independent traders/retailers, along with a national multiple anchor store, in the 'West Cumbria Retail, Town Centres and Leisure Study' prepared by Nexus Planning (2020) to inform Copeland's emerging Local Plan. Based on our visit, the centre can be considered to still offer a decent mix of uses as well as offering a wide range of independent retailers and national multiples.

Notwithstanding this, the convenience retail offer is limited in the centre. The Co-Op appears relatively well used by the local community, and Heron Frozen Foods to a lesser extent, albeit these only cater for top-up food shopping and offer limited access to fresh produce. Other miscellaneous uses present in the centre such as the doctors, dentist and veterinary surgery provide important facilities for the local community which will result in linked trips to local shops.

Parking is ample within the centre, although bus services appear to be limited. Regular pedestrian movement along Main Street was noted, indicating that Egremont benefits from a sizable walk-in catchment area. It is clear that many visitors use this mode of transport when visiting the centre, presumably to meet smaller-scale day-to-day food and service needs.

In conclusion, based on a site visit to Egremont in September 2023, our view is that this centre is a moderately performing centre albeit with some obvious deficiencies as noted above.

Cleator Moor Key Service Centre

Health Check Assessment (September 2023)

Centre Overview

Cleator Moor is a town and civil parish in Cumbria, within the administrative area of Cumberland Council, formerly Copeland. It had a population of 6,936 at the 2011 census. It was populated by Irish immigrants in the latter half of the nineteenth century, leading to the colloquial title of Little Ireland. It is situated just outside the Lake District National Park, roughly 5 kilometres south east of Whitehaven.

The shops and services located in Cleator Moor are defined as a 'Key Service Centre' through Policy ER7 'Principal Town Centre, Key Service Centres, Local Centres and other service areas: Roles and Functions' of the adopted Local Plan. How 'Key Service Centres' should be managed is described in more detail in Policy ER9 'The Key Service Centres, Local Centres and other smaller centres'. These policies are set out in the Copeland Local Plan 2013-2028 Core Strategy and Development Management Policies, which was adopted in 2006. The Council is in the process of preparing a new Local Plan which is at an advanced stage, however for the purposes of this report, the adopted planning framework will be used.

Cleator Moor Key Service Centre boundary is primarily focussed along B5295 Leconfield Street and around the Civic Hall and Market Square to the south. Market Square provides an attractive and central location for community events. Leconfield Street offers little in the way of planting, street furniture and general place making. Within Market Square area, there are efforts made with regard to planting and seating. The centre stretches roughly 500m from east to west along Leconfield Street.

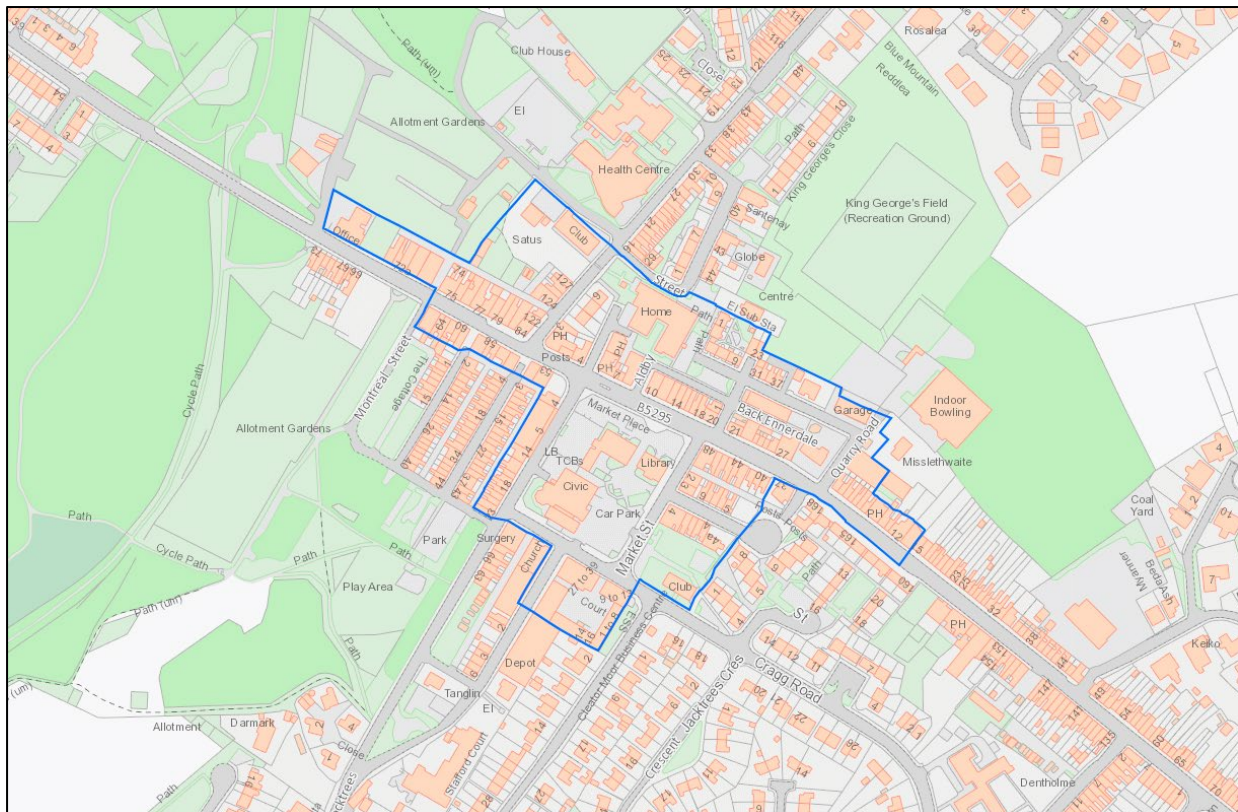


Figure 1: Cleator Moor Key Service Centre Boundary (Copeland Local Plan 2013-2028 Core Strategy Policies Map)

Diversity of Uses

Convenience Goods

As Table I on the following page shows, Cleator Moor's convenience retailing sector accounts for just 3.92% of all retail units located in the Key Service Centre, which is much lower than the national average of 9.3%. The convenience provision within Cleator Moor comprises the 'Four Seasons Express' convenience store and Wilsons butchers. Neither of these stores offers the full range of products generally found in a supermarket, and therefore are unlikely to cater to residents' weekly shopping need.

Further west along Leconfield Street B5295, outside of the centre boundary, there is a Co-Operative food store and a Nisa Local convenience store. As Cleator Moor Key Service Centre does not accommodate any main food shopping provision, residents must look towards Whitehaven to meet such needs if they do not utilise the Co-Op store.



Figure 2: Co-op Food Store out of Cleator Moor Centre, September 2023

Comparison Goods

Our visit to Cleator Moor Key Service Centre recorded 7 commercial units selling comparison goods, equating to 13.73% of all shop units within the Centre. This fell short of the national average position of 27.1% but is entirely normal for a centre of this scale, which is evidently focussed on serving the day-to-day 'top-up' food shopping and service needs of the surrounding residential community. Comparison goods units present within the centre included a charity shop, a florist, pet shop and gift shop.

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

Use Type	Number of Units (September 2023)	
	No.	Cleator Moor Key Service Centre %
Convenience	2	3.92%
Comparison	7	13.73%
Service	26	50.98%
Miscellaneous	6	11.76%
Vacant	10	19.61%
Total	51	100.00%

Leisure, Retail and Business Service Uses

26 Service Units were recorded during our site visit in September 2023. This equated to 50.98% of all shop units within the Centre, just above the national average position of 49.6%. The proportion of service units is not unsurprising, given the role and function of Cleator Moor as a Key Service centre which caters for the 'day-to-day' needs of the local residential catchment area. Services uses (leisure, retail and business) therefore evidently play a very important role in the overall health of Cleator Moor Key Service Centre as the dominant use type. The centre offers a range of leisure, retail and business services that serve the surrounding population. This includes barbers and salons, beauticians, hot food take-aways, and betting offices, among other uses.



Figure 3: Occupiers at the Phoenix Enterprise Centre, south of Market Place, September 2023

Vacant Units

A vacancy rate of 19.61% was identified on our visit to Cleator Moor, which is higher than the current national average position of 14.1% and represents 13 vacant units within the centre. The vacant units comprise former banks, shop units and the former Masonic Hall. These units are located throughout the centre, with the former Masonic Hall being the biggest and most prominent.

These vacancies do have a perceptible minor detrimental impact on the overall health or aesthetic of Cleator Moor.

Other Miscellaneous Uses

Alongside these categorised units, we also recorded six additional miscellaneous units serving Cleator Moor Key Service Centre, which equates to 11.76% of all units within the centre. Significant unit categorised as miscellaneous within the Centre include the Community Centre, Council Offices, Library, Cleator Moor Youth Social Club and Peak Health & Performance Health Club. The Council buildings occupying Market Square obviously offer invaluable facilities for people within the surrounding residential areas. Given the proximity of these facilities to other shops and services within Cleator Moor, it can be expected that users of these facilities would frequently use other services within the Centre.

Balance Between Independent and Multiple Stores

Cleator Moor comprises a total of 51 units, of which three are occupied by national multiple retailers (Age UK, Betfred and Greggs). Discounting vacant units, of which there are ten, multiple stores comprise 7.31% of the centre's retail offering – which is considered to represent a healthy proportion for a centre of this scale, role and function.

Accessibility

The Centre is primarily located along Leconfield Street B5295 which connects the A5086 in the southeast to Whitehaven to the northwest, and includes Market Square which is accessed off Leconfield Street to the south. On-street parking is permitted in the west of the centre on Leconfield Street and on the streets around Market Square. Restrictions are present within the eastern part of Leconfield Street, which is double-yellow lined. There are two public car parks located in the Market Square which do not appear to have restrictions or charges in place.

There are two bus stops within the centre, stopping on Leconfield Street outside of the civic buildings at Market Square. The 'Square High Street' stop is located on the northern side of Leconfield Street heading east and 'Square' is located on the south side of Leconfield Street heading west. Services 30 and S34 serve these stops.

The surrounding area is predominantly residential in nature. Therefore, the centre has an extensive walk-in catchment. The centre is also pedestrian-friendly, with wide pavements and a dedicated pedestrian crossings present.

Pedestrian Activity

Pedestrian activity was noticeably low within the Centre – however, the time of our visit was a weekday afternoon.

Environmental Quality

From Avison Young's on-site observations, Cleator Moor has a relatively poor environmental quality. The centre has two distinct areas which differ in character and environmental quality. Leconfield Street has no street planting or seating areas, and the pavements provide limited width. The buildings along Leconfield Street are generally poorly maintained and there is a high vacancy rate, which contributes to the poor environmental quality.

The Market Square area provides a better-quality public realm, with several areas of planting, mature trees, street furniture and well-maintained fencing and street lighting. The appearance of the civic buildings in this location also improves the general quality and character of this area.

Notwithstanding this, the Market Square provides a fraction of the overall centre. The environmental quality of the centre as a whole must be considered of limited environmental quality.

Summary / Conclusions

The centre lacks a level of retail and other service provision sufficient to draw footfall and encourage users to spend time in the centre rather than passing through and shopping at the out-of-centre Co-Op / Nisa or further afield at Whitehaven. This appears to be the case from the number of vacancies and levels of footfall we observed on our visit.

The environmental quality of the centre is poor due to the number of vacancies, poorly maintained buildings and shop fronts and lack of trees and planting and street furniture in the public realm.

Notwithstanding this, Cleator Moor does provide a key service for local residents, particularly less-mobile residents who do not have access to a private vehicle. The Council's Retail, Town Centres and Leisure Study (2020) states that the town holds a market on Fridays and the local medical centre which acts as a community hub.

Appendix VIII

Convenience Goods Retail Impact Assessment tables

EGREMONT
RETAIL IMPACT ASSESSMENT - JANUARY 2024

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	2027
Aldi Foodstore	Convenience	1855*	1,126	£11,427	£12.87	£11.88	£12.28	£12.63	£12.64	£12.65	£12.67
	Comparison		282	£7,448	£2.10	£2.17	£2.17	£2.16	£2.20	£2.25	£2.29
	Total		1,408	-	£14.97	£14.05	£14.45	£14.79	£14.84	£14.90	£14.96

* Gross internal area

<p>Notes:</p> <p>a. Gross floorspace of proposed Aldi foodstore sourced from architectural drawings</p> <p>b. Net sales area and convenience goods / comparison goods floorspace split of Aldi provided by operator</p> <p>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)</p> <p>2021 Prices</p>

EGREMONT
RETAIL IMPACT ASSESSMENT - JANUARY 2024

TABLE 2a. POPULATION WITHIN EACH ZONE

ZONE	POPULATION						
	2021	2022	2023	2024	2025	2026	2027
Zone 1	19081	19250	19286	19314	19348	19374	19378
Zone 2	15980	16125	16160	16198	16229	16280	16311
Zone 3	17,730	17,888	17,902	17,900	17,907	17897	17901
Zone 4	9825	9911	9907	9901	9907	9903	9906
Zone 5	35116	35417	35480	35542	35562	35567	35580
Zone 6	37869	38020	37883	37729	37590	37427	37283
Zone 7	16858	16912	16822	16758	16668	16592	16523
Zone 8	10,870	10,922	10,872	10,824	10,773	10743	10692
TOTAL	163,329	164,445	164,312	164,166	163,984	163,783	163,574
Notes:							
a. Base population derived from Experian Location Analyst data (January 2024 Report)							
b. Base year taken as 2024 and test/design year as 2027							

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	2027
Zone 1	£3,033	£2,830	£2,762	£2,751	£2,751	£2,754	£2,756
Zone 2	£2,734	£2,551	£2,490	£2,480	£2,480	£2,482	£2,482
Zone 3	£3,149	£2,938	£2,868	£2,856	£2,856	£2,859	£2,859
Zone 4	£3,250	£3,032	£2,959	£2,948	£2,948	£2,951	£2,951
Zone 5	£2,853	£2,662	£2,598	£2,588	£2,588	£2,590	£2,590
Zone 6	£2,832	£2,642	£2,579	£2,569	£2,569	£2,571	£2,571
Zone 7	£3,132	£2,922	£2,852	£2,841	£2,841	£2,843	£2,843
Zone 8	£3,037	£2,834	£2,766	£2,754	£2,754	£2,757	£2,757
ANNUAL GROWTH	-	-6.7%	-2.4%	-0.4%	0.0%	0.1%	0.1%
Notes:							
a. Per capita expenditure derived from Experian Location Analyst data (January 2024 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)							
2021 Prices							

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	2027
Zone 1	£2,857	£2,666	£2,607	£2,589	£2,580	£2,577	£2,574
Zone 2	£2,575	£2,403	£2,350	£2,333	£2,326	£2,323	£2,318
Zone 3	£2,966	£2,768	£2,707	£2,688	£2,679	£2,676	£2,670
Zone 4	£3,062	£2,856	£2,794	£2,774	£2,765	£2,762	£2,756
Zone 5	£2,688	£2,507	£2,452	£2,435	£2,427	£2,424	£2,419
Zone 6	£2,668	£2,489	£2,434	£2,417	£2,409	£2,407	£2,401
Zone 7	£2,950	£2,753	£2,692	£2,673	£2,664	£2,661	£2,656
Zone 8	£2,861	£2,669	£2,611	£2,592	£2,584	£2,581	£2,575
ANNUAL DEDUCTION	5.8%	5.8%	5.6%	5.9%	6.2%	6.4%	6.6%
Notes:							
a. Per capita expenditure derived from Experian Location Analyst data (January 2024 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)							
2021 Prices							

TABLE 2d. TOTAL CONVENIENCE GOODS EXPENDITURE WITHIN STUDY AREA

ZONE	TOTAL CONVENIENCE GOODS EXPENDITURE (£m)						
	2021	2022	2023	2024	2025	2026	2027
Zone 1	£54.52	£51.31	£50.28	£49.99	£49.92	£49.93	£49.89
Zone 2	£41.16	£38.75	£37.98	£37.80	£37.75	£37.82	£37.81
Zone 3	£52.59	£49.51	£48.46	£48.11	£47.97	£47.89	£47.80
Zone 4	£30.08	£28.31	£27.68	£27.46	£27.39	£27.35	£27.30
Zone 5	£94.38	£88.81	£87.01	£86.54	£86.31	£86.23	£86.08
Zone 6	£101.02	£94.63	£92.22	£91.19	£90.56	£90.07	£89.53
Zone 7	£49.74	£46.55	£45.29	£44.79	£44.41	£44.16	£43.88
Zone 8	£31.10	£29.15	£28.38	£28.06	£27.83	£27.72	£27.53
TOTAL	£454.58	£427.02	£417.31	£413.94	£412.16	£411.18	£409.82
Notes:							
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)							
2021 Prices							

Particulars	2023		2022		2021		2020		2019		2018		2017		2016		2015		2014		2013		2012		2011		2010		2009		2008		2007		2006		2005		2004		2003		2002		2001		2000		1999		1998		1997		1996		1995		1994		1993		1992		1991		1990		1989		1988		1987		1986		1985		1984		1983		1982		1981		1980		1979		1978		1977		1976		1975		1974		1973		1972		1971		1970		1969		1968		1967		1966		1965		1964		1963		1962		1961		1960		1959		1958		1957		1956		1955		1954		1953		1952		1951		1950		1949		1948		1947		1946		1945		1944		1943		1942		1941		1940		1939		1938		1937		1936		1935		1934		1933		1932		1931		1930		1929		1928		1927		1926		1925		1924		1923		1922		1921		1920		1919		1918		1917		1916		1915		1914		1913		1912		1911		1910		1909		1908		1907		1906		1905		1904		1903		1902		1901		1900		1899		1898		1897		1896		1895		1894		1893		1892		1891		1890		1889		1888		1887		1886		1885		1884		1883		1882		1881		1880		1879		1878		1877		1876		1875		1874		1873		1872		1871		1870		1869		1868		1867		1866		1865		1864		1863		1862		1861		1860		1859		1858		1857		1856		1855		1854		1853		1852		1851		1850		1849		1848		1847		1846		1845		1844		1843		1842		1841		1840		1839		1838		1837		1836		1835		1834		1833		1832		1831		1830		1829		1828		1827		1826		1825		1824		1823		1822		1821		1820		1819		1818		1817		1816		1815		1814		1813		1812		1811		1810		1809		1808		1807		1806		1805		1804		1803		1802		1801		1800		1799		1798		1797		1796		1795		1794		1793		1792		1791		1790		1789		1788		1787		1786		1785		1784		1783		1782		1781		1780		1779		1778		1777		1776		1775		1774		1773		1772		1771		1770		1769		1768		1767		1766		1765		1764		1763		1762		1761		1760		1759		1758		1757		1756		1755		1754		1753		1752		1751		1750		1749		1748		1747		1746		1745		1744		1743		1742		1741		1740		1739		1738		1737		1736		1735		1734		1733		1732		1731		1730		1729		1728		1727		1726		1725		1724		1723		1722		1721		1720		1719		1718		1717		1716		1715		1714		1713		1712		1711		1710		1709		1708		1707		1706		1705		1704		1703		1702		1701		1700		1699		1698		1697		1696		1695		1694		1693		1692		1691		1690		1689		1688		1687		1686		1685		1684		1683		1682		1681		1680		1679		1678		1677		1676		1675		1674		1673		1672		1671		1670		1669		1668		1667		1666		1665		1664		1663		1662		1661		1660		1659		1658		1657		1656		1655		1654		1653		1652		1651		1650		1649		1648		1647		1646		1645		1644		1643		1642		1641		1640		1639		1638		1637		1636		1635		1634		1633		1632		1631		1630		1629		1628		1627		1626		1625		1624		1623		1622		1621		1620		1619		1618		1617		1616		1615		1614		1613		1612		1611		1610		1609		1608		1607		1606		1605		1604		1603		1602		1601		1600		1599		1598		1597		1596		1595		1594		1593		1592		1591		1590		1589		1588		1587		1586		1585		1584		1583		1582		1581		1580		1579		1578		1577		1576		1575		1574		1573		1572		1571		1570		1569		1568		1567		1566		1565		1564		1563		1562		1561		1560		1559		1558		1557		1556		1555		1554		1553		1552		1551		1550		1549		1548		1547		1546		1545		1544		1543		1542		1541		1540		1539		1538		1537		1536		1535		1534		1533		1532		1531		1530		1529		1528		1527		1526		1525		1524		1523		1522		1521		1520		1519		1518		1517		1516		1515		1514		1513		1512		1511		1510		1509		1508		1507		1506		1505		1504		1503		1502		1501		1500		1499		1498		1497		1496		1495		1494		1493		1492		1491		1490		1489		1488		1487		1486		1485		1484		1483		1482		1481		1480		1479		1478		1477		1476		1475		1474		1473		1472		1471		1470		1469		1468		1467		1466		1465		1464		1463		1462		1461		1460		1459		1458		1457		1456		1455		1454		1453		1452		1451		1450		1449		1448		1447		1446		1445		1444		1443		1442		1441		1440		1439		1438		1437		1436		1435		1434		1433		1432		1431		1430		1429		1428		1427		1426		1425		1424		1423		1422		1421		1420		1419		1418		1417		1416		1415		1414		1413		1412		1411		1410		1409		1408		1407		1406		1405		1404		1403		1402		1401		1400		1399		1398		1397		1396		1395		1394		1393		1392		1391		1390		1389		1388		1387		1386		1385		1384		1383		1382		1381		1380		1379		1378		1377		1376		1375		1374		1373		1372		1371		1370		1369		1368		1367		1366		1365		1364		1363		1362		1361		1360		1359		1358		1357		1356		1355		1354		1353		1352		1351		1350		1349		1348		1347		1346		1345		1344		1343		1342		1341		1340		1339		1338		1337		1336		1335		1334		1333		1332		1331		1330		1329		1328		1327		1326		1325		1324		1323		1322		1321		1320		1319		1318		1317		1316		1315		1314		1313		1312		1311		1310		1309		1308		1307		1306		1305		1304		1303		1302		1301		1300		1299		1298		1297		1296		1295		1294		1293		1292		1291		1290		1289		1288		1287		1286		1285		1284		1283		1282		1281		1280		1279		1278		1277		1276		1275		1274		1273		1272		1271		1270		1269		1268		1267		1266		1265		1264		1263		1262		1261		1260		1259		1258		1257		1256		1255		1254		1253		1252		1251		1250		1249		1248		1247		1246		1245		1244		1243		1242		1241		1240		1239		1238		1237		1236		1235		1234		1233		1232		1231		1230		1229		1228		1227		1226		1225		1224		1223		1222		1221		1220		1219		1218		1217		1216		1215		1214		1213		1212		1211		1210		1209		1208		1207		1206		1205		1204		1203		1202		1201		1200		1199		1198		1197		1196		1195		1194		1193		11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TABLE 5. EXISTING CONVENIENCE GOODS SHOPPING PATTERNS FOR ZONES 6 AND 7 (£m) IN 2027

ZONE 6

POSTCODE SECTOR	EXPENDITURE FLOW (%)	2027 (£M)		TOTAL 2027 (£M)
		MAIN FOOD	TOP UP	
Zone 1	0.2%	0.0	0.2	0.2
Zone 2	0.1%	0.0	0.1	0.1
Zone 3	0.3%	0.3	0.0	0.3
Zone 4	0%	0.0	0.0	0.0
Zone 5	4%	2.8	0.9	3.7
Zone 6	94%	59.2	25.1	84.4
Zone 7	1%	0.0	0.5	0.5
Zone 8	0%	0.0	0.0	0.0
Beyond Study Area	0.3%	0.3	0.0	0.3
TOTAL	100%	62.67	26.89	£89.56

Note: Shopping patterns taken from Tables 3 and 4

ZONE 7

POSTCODE SECTOR	EXPENDITURE FLOW (%)	2027 (£M)		TOTAL 2027 (£M)
		MAIN FOOD	TOP UP	
Zone 1	0.0%	0.0	0.0	0.0
Zone 2	0.0%	0.0	0.0	0.0
Zone 3	3.2%	1.3	0.1	1.4
Zone 4	0.4%	0.2	0.0	0.2
Zone 5	2.5%	0.6	0.5	1.1
Zone 6	63%	25.0	2.7	27.7
Zone 7	29%	3.1	9.7	12.8
Zone 8	0.6%	0.2	0.0	0.2
Beyond Study Area	0.8%	0.2	0.1	0.4
TOTAL	100%	30.7	13.1	£43.80

Note: Shopping patterns taken from Tables 3 and 4

EGREMONT
RETAIL IMPACT ASSESSMENT - JANUARY 2024

TABLE 6. ANTICIPATED CONVENIENCE TRADE DRAW TO ALDI DEVELOPMENT

ZONE	TRADE DRAW (%)	2027 (£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	10%	1.27
Zone 7	90%	11.40
Zone 8	0%	0.0
Beyond Study Area	0%	0.0
TOTAL	100.00%	£12.67

Note: Trade draw informed by shopping patterns for primary catchment.

EGREMONT
RETAIL IMPACT ASSESSMENT - JANUARY 2024
TABLE 7. CONVENIENCE GOODS TRADE DRAW ALLOCATION OF ALDI PROPOSALS 2027 (£m)

Destination	Convenience turnover from Zone 7	Convenience turnover from wider study area 2027	Total Convenience turnover (from HH survey) 2027	Zone 6		Zone 7	
	Total (£m)	Total (£m)	Total (£m)	(£m)	(%)	(£m)	(%)
Zone 6							
WHITEHAVEN TOWN CENTRE	10.3	32.2	42.5	0.2	15%	1.7	15%
Local shops, Whitehaven Town Centre	0.0	0.4	0.4	0.0	0%	0.0	0%
B&M, The Bridges Retail Park, Whitehaven, CA28 7RQ	0.0	0.8	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	0.0	0.8	0.8	0.0	0%	0.0	0%
Morrisons, Flatt Walks, Whitehaven	10.3	30.2	40.5	0.2	15%	1.7	15%
Tesco Superstore, Bransty Row, North Shore, Whitehaven	5.8	22.7	28.5	0.2	15%	1.1	10%
Iceland, Preston Street, Whitehaven	0.0	1.7	1.74	0.0	0%	0.0	0%
Home Bargains, Preston Street, Whitehaven, CA28 9DL	0.0	0.5	0.5	0.0	0%	0.0	0%
Asda, Preston Street, Whitehaven	0.4	4.0	4.33	0.0	0%	0.0	0%
Aldi, Preston Street, Whitehaven	8.1	17.8	25.9	0.8	60%	7.4	65%
Nisa Local, Four Seasons, Whinlatter Road, Whitehaven, CA28 8DJ	0.0	0.4	0.4	0.0	0%	0.0	0%
Nisa Local, Woodhouse Road, Whitehaven, CA28 9QD	0.0	0.5	0.5	0.0	0%	0.0	0%
Spar (Service Station), Loop Road North, Whitehaven	0.0	0.4	0.4	0.0	0%	0.0	0%
Spar, Richmond Hill Road, Hensingham, Whitehaven	0.0	0.9	0.9	0.0	0%	0.0	0%
Woodhouse Convenience Store, Woodhouse Road, Whitehaven CA28 9LL	0.0	0.1	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%
McCull's, Lakeland Avenue, Seacliffe, Whitehaven, CA28 9PY	0.0	0.8	0.8	0.0	0%	0.0	0%
CLEATOR MOOR KEY SERVICE CENTRE	0.0	0.0	0.0	0.0	0%	0.0	0%
Local shops, Cleator Moor Centre	0.0	0.0	0.0	0.0	0%	0.0	0%
Nisa, Leaconfield Street, Cleator Moor, CA25 5QG	0.3	0.0	0.3	0.0	0%	0.0	0%
Co-op, Leaconfield Street, Cleator Moor	2.9	4.4	7.3	0.1	10%	0.6	5%
FRIZINGTON LOCAL CENTRE	0.0	0.3	0.3	0.0	0%	0.0	0%
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	0.0	0.3	0.3	0.0	0%	0.0	0%
Local shops, Hensingham	0.0	0.1	0.1	0.0	0%	0.0	0%
Local shops, Mirehouse	0.0	0.0	0.0	0.0	0%	0.0	0%
ZONE 6 SUB-TOTAL	27.71	86.73	114.44	1.27	100%	10.83	95%
Zone 7							
EGREMONT KEY SERVICE CENTRE	8.88	0.54	9.41	0.0	0%	0.6	5%
Co-op, Main Street, Egremont	6.0	0.3	6.3	0.0	0%	0.6	5%
Heron, Main Street, Egremont, CA22 2DR	2.5	0.0	2.5	0.0	0%	0.0	0%
Local shops, Egremont Centre	0.36	0.19	0.54	0.0	0%	0.0	0%
Spar (Service Station), Bridge End Garage, Egremont	0.1	0.0	0.1	0.0	0%	0.0	0%
Nisa Local, Jubilee Garage, North Road, Egremont, CA22 2PR	0.0	0.0	0.0	0.0	0%	0.0	0%
ST BEES LOCAL CENTRE	0.24	0.0	0.2	0.0	0%	0.0	0%
St. Bees Post Office, Main Street, St. Bees, CA27 0AA	0.1	0.0	0.1	0.0	0%	0.0	0%
St. Bees Village Centre	0.1	0.0	0.1	0.0	0%	0.0	0%
SEASCALE LOCAL CENTRE	3.02	0.0	3.0	0.0	0%	0.0	0%
Co-op, Gosforth Road, Seascale	2.1	0.0	2.1	0.0	0%	0.0	0%
McCull's, South Parade, Seascale, CA20 1PZ	0.9	0.0	0.9	0.0	0%	0.0	0%
Local shops, Seascale Local Centre	0.0	0.0	0.0	0.0	0%	0.0	0%
BIGRIGG LOCAL CENTRE	0.2	0.0	0.2	0.0	0%	0.0	0%
Spar (Service Station), Parkhouse, Bigrigg, Egremont	0.2	0.0	0.2	0.0	0%	0.0	0%
Local shops, Gosforth Village Centre	0.0	0.0	0.0	0.0	0%	0.0	0%
Local shops, Thornhill Village Centre	0.1	0.0	0.1	0.0	0%	0.0	0%
Spar (Service Station), A595 Holmrook, Holmrook	0.3	0.0	0.3	0.0	0%	0.0	0%
ZONE 7 SUB-TOTAL	12.82	0.5	13.4	0.0	0%	0.6	5%
TOTAL	40.5	87.3	127.8	1.27	100%	11.40	100%

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.

EGREMONT
RETAIL IMPACT ASSESSMENT - JANUARY 2024
TABLE 8. CONVENIENCE GOODS TRADING IMPACTS 2027 (£m)

Destination	Convenience turnover from Zone 7	Convenience turnover from wider study area 2027	Total Convenience turnover (from HH survey) 2027	PROPOSED ALDI, EGREMONT			Post-Impact Total Turnover (from Study Area) 2027 (£m)
	Total (£m)	Total (£m)	Total (£m)	(% Diversion)	(£m Diversion)	(% Trading Impact)	
Zone 6							
WHITEHAVEN TOWN CENTRE	10.3	32.2	42.5	15%	1.9	4.5%	40.6
Local shops, Whitehaven Town Centre	0.0	0.4	0.4	0%	0.0	0%	0.4
B&M, The Bridges Retail Park, Whitehaven, CA28 7RQ	0.0	0.8	0.8	0%	0.0	0%	0.8
Haighs, King Street, Whitehaven, CA28 7JH	0.0	0.0	0.0	0%	0.0	0%	0.0
Heron, King Street, Whitehaven, CA28 7LA	0.0	0.8	0.8	0%	0.0	0%	0.8
Morrisons, Flatt Walks, Whitehaven	10.3	30.2	40.5	15%	1.9	4.7%	38.6
Tesco Superstore, Bransty Row, North Shore, Whitehaven	5.8	22.7	28.5	10.5%	1.3	5%	27.2
Iceland, Preston Street, Whitehaven	0.0	1.7	1.74	0%	0.0	0%	1.7
Home Bargains, Preston Street, Whitehaven, CA28 9DL	0.0	0.5	0.5	0%	0.0	0%	0.5
Asda, Preston Street, Whitehaven	0.4	4.0	4.33	0%	0.0	0%	4.3
Aldi, Preston Street, Whitehaven	8.1	17.8	25.9	64.5%	8.2	32%	17.7
Nisa Local, Four Seasons, Whinlatter Road, Whitehaven, CA28 8DJ	0.0	0.4	0.4	0%	0.0	0%	0.4
Nisa Local, Woodhouse Road, Whitehaven, CA28 9QD	0.0	0.5	0.5	0%	0.0	0%	0.5
Spar (Service Station), Loop Road North, Whitehaven	0.0	0.4	0.4	0%	0.0	0%	0.4
Spar, Richmond Hill Road, Hensingham, Whitehaven	0.0	0.9	0.9	0%	0.0	0%	0.9
Woodhouse Convenience Store, Woodhouse Road, Whitehaven CA28 9LL	0.0	0.1	0.1	0%	0.0	0%	0.1
Premier Stores, Meadow Road, Whitehaven, CA28 8ER	0.0	0.0	0.0	0%	0.0	0%	0.0
McCull's, Lakeland Avenue, Seaccliffe, Whitehaven, CA28 9PY	0.0	0.8	0.8	0%	0.0	0%	0.8
CLEATOR MOOR KEY SERVICE CENTRE	0.0	0.0	0.0	0%	0.0	0%	0.0
Local shops, Cleator Moor Centre	0.0	0.0	0.0	0%	0.0	0%	0.0
Nisa, Leaconfield Street, Cleator Moor, CA25 5QG	0.3	0.0	0.3	0%	0.0	0%	0.3
Co-op, Leaconfield Street, Cleator Moor	2.9	4.4	7.3	5.5%	0.7	10%	6.6
FRIZINGTON LOCAL CENTRE	0.0	0.3	0.3	0%	0.0	0%	0.3
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	0.0	0.3	0.3	0%	0.0	0%	0.3
Local shops, Hensingham	0.0	0.1	0.1	0%	0.0	0%	0.1
Local shops, Mirehouse	0.0	0.0	0.0	0%	0.0	0%	0.0
ZONE 6 SUB-TOTAL	27.71	86.73	114.44	95.5%	12.10	-	102.3
Zone 7							
EGREMONT KEY SERVICE CENTRE	8.88	0.54	9.41	4.5%	0.57	6%	8.84
Co-op, Main Street, Egremont	6.0	0.3	6.3	5%	0.57	9%	5.8
Heron, Main Street, Egremont, CA22 2DR	2.5	0.0	2.5	0%	0.0	0%	2.5
Local shops, Egremont Centre	0.36	0.19	0.54	0%	0.0	0%	0.5
Spar (Service Station), Bridge End Garage, Egremont	0.1	0.0	0.1	0%	0.0	0%	0.1
Nisa Local, Jubilee Garage, North Road, Egremont, CA22 2PR	0.0	0.0	0.0	0%	0.0	0%	0.0
ST BEES LOCAL CENTRE	0.24	0.0	0.2	0%	0.0	0%	0.2
St. Bees Post Office, Main Street, St. Bees, CA27 0AA	0.1	0.0	0.1	0%	0.0	0%	0.1
St. Bees Village Centre	0.1	0.0	0.1	0%	0.0	0%	0.1
SEASCALE LOCAL CENTRE	3.02	0.0	3.0	0%	0.0	0%	3.0
Co-op, Gosforth Road, Seascale	2.1	0.0	2.1	0%	0.0	0%	2.1
McCull's, South Parade, Seascale, CA20 1PZ	0.9	0.0	0.9	0%	0.0	0%	0.9
Local shops, Seascale Local Centre	0.0	0.0	0.0	0%	0.0	0%	0.0
BIGRIGG LOCAL CENTRE	0.2	0.0	0.2	0%	0.0	0%	0.2
Spar (Service Station), Parkhouse, Bigrigg, Egremont	0.2	0.0	0.2	0%	0.0	0%	0.2
Local shops, Gosforth Village Centre	0.0	0.0	0.0	0%	0.0	0%	0.0
Local shops, Thornhill Village Centre	0.1	0.0	0.1	0%	0.0	0%	0.1
Spar (Service Station), A595 Holmrook, Holmrook	0.3	0.0	0.3	0%	0.0	0%	0.3
ZONE 7 SUB-TOTAL	12.82	0.5	13.4	4.5%	0.57	-	12.8
TOTAL	40.5	87.3	127.8	100%	12.67	-	115.13

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.

ALDI, EGREMONT
 RETAIL IMPACT ASSESSMENT - JANUARY 2024

TABLE 9: CONVENIENCE EXPENDITURE RECOVERY PROJECTION 2027 (£m)

Zone 7	Pre- Development		Post Aldi, Egremont	
	Expenditure Retention (£m)	(%) of Total	Expenditure Retention (£m)	(%) of Total
Convenience Expenditure Retention (£m)	£12.82	29%	£23.65	54%
Convenience Expenditure Leakage (£m)	£30.98	71%	£20.15	46%
a. Figures taken from Table 5 Convenience Goods Expenditure Flow and Table 7 Convenience Goods Trade Draw Allocations				

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