

Filtered Data Export

Full name: Elliott Kelly

Organisation (where relevant): Avison Young

Other party name (if relevant): Aldi Stores Ltd

Proposal:

9. Supporting the Economy and Town Centres

1. To which part of the Supporting the Economy and Town Centres chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SE01

2. Do you consider that this part of the Supporting the Economy and Town Centres chapter is legally compliant?: Yes

2(a). If yes, and you wish to support the legal compliance of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.:

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2(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not legally compliant. Please be as precise as possible.:

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2(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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3. Do you consider that this part of the Supporting the Economy and Town Centres chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Supporting the Economy and Town Centres chapter, please use this box to set out your comments.:

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3(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter is not sound. Please be as precise as possible.:

The objective of Draft Policy SE01 is to support employment growth within the built-up area boundaries of the district's towns. The Policy states: "On existing employment and business parks, and on land allocated for employment uses, uses other than E(g), B2 and B8 (offices, research and development, industrial process and storage and distribution) will not be permitted unless they can be shown to be subordinate to, directly compatible with and complementary to the overall business use and will enhance job provision and the effective operation and business appeal of the park or site". We are concerned that the current phrasing of this policy would preclude other employment generating uses which could complement, enable and produce a higher quantum of jobs than offices, research and development, industrial process and storage and distribution uses. Paragraph 85 of the NPPF confirms how the operation of the planning system should view economic growth in both its plan-making and decision-taking limbs. In the application of both it says that "significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development." Aldi believes that to support economic growth and job creation, and to unlock additional investment in the UK, it is vital that the jobs and economic benefits arising from applications for major retail development are recognised in the application of the terms "employment" and "economic development". Job generation, quality and accessibility Aldi food stores deliver the following wide range of positive economic benefits to the local area including:

- Employment provision of up to 40 gross jobs
- Temporary employment provision during the construction process
- Based on Experian data, which sets out that the average GVA per Wholesale and Retail FTE is £37,200 , it is estimated that these roles will deliver just under £1.5m in GVA to the economy each year or around £23m over two decades when adjusted to current values These gross figures do not consider a number of economic factors which would further elevate the associated benefits such as:
 - Leakage: A measure of the extent to which employment will be taken up by people living outside the target areas (i.e. East Devon and the South West)
 - Displacement: A measure of the extent to which investment displaces existing employment (in East Devon and the South West) rather than creating new demand for labour.
 - Multiplier Effects: A measure of the extent to which investment will generate further employment linked to supply chain spending and wage spending of employees. Proposals for a foodstore are considered to deliver more significant better economic

benefits than, for example light industrial uses which are currently enabled under Policy SE01 as cited above, for the following reasons:

- Supermarkets support higher employment densities than light industrial uses as stated in the Government's Employment Density Guide.
- The Wholesale and Retail sectors in East Devon generates higher GVA per FTE than roles in the Manufacturing, Transport and Storage sectors. An Aldi food store will also provide 'good' and 'accessible' employment opportunities. This is important because additional jobs are not necessarily better for a local population if they are not well-paid and accessible. In relation to 'good' employment, all hourly paid wages for store employees exceed the Government's National Living Wage and the Living Wage Foundation's recommended national rate and remain the only major supermarket chain to pay workers during their breaks. In relation to 'accessible' employment, Aldi foodstores create the following benefits:
 - Around 80% of the roles generated will be 'shop floor' focused with low barriers to entry. These roles tend to be accessible to people in lower skilled occupations or those with lower-level qualifications.
 - Aldi recruitment is focused locally with job vacancies 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.
 - Aldi ensures employment mobility, with the two of the most successful apprentice schemes and graduate programmes in the UK. Apprentices are trained to work in all parts of the business including at store, distribution, logistics and management level, as well as progression through to the Store Management Team.
 - 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. These types of roles are important in the Exmouth and East Devon context. This is because over 15% of people in the district have no qualifications and a further 25% only have Level 1 or 2 qualifications which are equivalent to GCSEs or below. There are also challenges related to deprivation across Exmouth – primarily driven by Education, Skills and Training as well as Employment. Complementary and Enabling Uses As is the case with the Dinan Way, Exmouth site, new food stores can also help enable the delivery of more traditional employment uses. Most development sites require significant investment in roads, power, water, sewerage and other utilities in order to bring development forward – an Aldi foodstore is able to provide a serviced plot to help

facilitate future employment units on the adjacent plot. Where they are not directly enabling employment or other development, we would also note that retail food stores are inherently complementary uses, serving residents and works in a local area. Where residents/workers are not served by an accessible foodstore, they may be pushed to journeying by car to further destinations to meet their day-to-day requirements given which would in turn generate more vehicle trips during the day contributing to congestion, noise and air pollution. These 'mixed-use' environments also reflect an increasing focus on ensuring that business and industrial parks offer a greater range of amenities to cater to workers. Occupiers are looking for amenity-rich environments to attract and retain employees who now have higher demands from their workplaces. With the above in mind, we would recommend that Policy SE01 is redrafted to put less emphasis on the Use Class Order and more emphasis on the specific economic benefits associated with a particular application in order to realise the wider plan's goals of creating a diverse, inclusive and thriving economy, as well as the desire to boost economic growth which is at the heart of the planning system.

3(c). Please set out the modification(s) you consider necessary to make this part of the Supporting the Economy and Town Centres chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Supporting the Economy and Town Centres chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Suggest wording is amended to the below to avoid preclude other employment generating uses that may be equally if not more beneficial in economic terms to that area, as well as compatible with overall uses as set out above.

"On existing employment and business parks, and on land allocated for employment uses, development proposals will be expected to demonstrate that they are directly compatible with and complementary to the overall business use and will enhance job provision and the effective operation and business appeal of the park or site"

4. Do you consider that this part of the Supporting the Economy and Town Centres chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Supporting the Economy and Town Centres chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

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4(b). If no, please give details of why you consider this part of the Supporting the Economy and Town Centres chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

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