

28 March 2025

Planning Policy Team  
East Devon District Council  
Blackdown House  
Border Road  
Honiton  
EX14 1EJ

Dear Sir / Madam

### **Representation to the East Devon District Council - Regulation 19 Local Plan Consultation**

We act on behalf of our client, Aldi Stores Ltd ('Aldi') and write with regards to the above consultation process. This written representation is submitted alongside responses via the online consultation portal for completeness.

Aldi currently operate a number of stores within the region and the business has ambitious plans to further grow their presence in the area in the near future, in order to meet the growing demands from local customers for their products. Aldi therefore welcome the opportunity to engage with and respond to the East Devon District Council Local Development Plan (LDP) process to ensure that an appropriate policy framework is in place to support their plans for investment.

In support of these ambitions, our client is preparing to submit a planning application for the development of a new store and the delivery of employment units at Dinan Way and hold aims to expand even further across the administrative area in the future.

This representation will therefore firstly focus on the Aldi business itself, followed by their comments on the key Issues of relevance, identified within the Reg19 iteration of the emerging East Devon Local Development Plan.

#### **About Aldi**

Aldi currently operates over 1,000 stores across the UK, with plans to open even more in the future as part of their long-term expansion target. This growth is fuelled by changing customer shopping habits and a growing appetite amongst UK shoppers for Aldi's high-quality products and offers.

Aldi adopts a different approach to food retailing than other convenience store operators. Their philosophy is based on simplicity and maximum efficiency at every stage of the business, from supplier to customer, enabling Aldi to sell high quality products from a range of exclusive own brand labels at competitive prices. This philosophy is critical to the business and dictates the store layout, the servicing and indeed the types of sites that can accommodate this model.

It is also worth noting that Aldi does not offer any internal specialist concessions or deli counters, this means that they focus solely on the grocery market and compete most actively with other food operators like the 'big 4' and not small independent shops. This can be seen from their recent growth in market share that has been at the expense of these major operators. This means that

the introduction of an Aldi store in an area often complements small local businesses, given that the foodstore does not compete for this style of service. Aldi are often complementary to the existing pattern of trade, with Aldi customers using these other facilities to supplement their Aldi food shop.

This business model requires certain characteristics for store locations in order for them to be viable. In the first instance, Aldi will always seek to locate within or adjacent to a designated centre, however, where these opportunities are unavailable, they will select highly accessible locations to meet local demand. A key aspect of their stores is that they generally require a smaller catchment population than large superstores, which is due to their smaller store format with a net sales area of around 1,300 sq.m dependant on the location of each site. They continue to serve localised areas and meet the needs of these smaller more sustainable communities.

Our development projects have substantial planning merits which include the following;

- the operational model serves 'neighbourhood' catchments, enhancing consumer choice at the local level and reducing the need to travel
- building design and operation is energy efficient and sustainable and represents "good design"
- Aldi is rolling out EVCP spaces and PV arrays across its UK store portfolio
- Aldi's new stores deliver significant investment into local communities as well as providing good quality, well paid jobs with prospects

## **The Vision**

It is noted that the Vision for the proposed Local Development Plan aims to make the future of East Devon more sustainable, diverse, inclusive and prosperous. Our client supports these ambitions within the Local Development Plan and believes that they have an important role to play, as a successful economic driver, in contributing to this vision

The comments in this representation principally focus on those falling under Objective 10 and 11 "*Supporting jobs and the economy*" and "*promoting vibrant town centres*" respectfully. Aldi fully support the priorities within this objective such as, "*Playing a role in helping to maintain sustainable communities*" and consider that they are already contributing to this through their current store estate and future expansion plans for the area, where they can offer local communities affordable and high-quality products.

Our client supports the 'town centre first principle' which forms the basis of the objectives above and will strive to find locations within these areas to accommodate their business format and typical site requirements. Aldi welcomes the decision to support the development of businesses within the district and Aldi looks forward to working with the Council in order to bring more of its stores to the region which will lead to the creation of jobs in the area.

Aldi also support the ambitions to promote using resources sustainably within policies such as CC01 – CC06. This is welcomed and Aldi look forward to engaging further with the Council about their growth plans, strong record on sustainability and their economic credentials. Aldi take pride in operating energy efficient properties and meeting their recycling obligations through their preparations for the Deposit Return Scheme.

**Policy SE01: Employment development within settlement boundaries**

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.

#### **Policy SE06: Town Centre Hierarchy**

We support the sentiment of Policy SE06 with respect to reinforcing the town centre hierarchy, however, we would seek the following paragraph to be re-drafted to cross refer to Policy SE07 to avoid precluding speculative retail or other commercial uses from coming forward:

*"Outside of town centre areas development proposals for retail uses, or other leisure, commercial or communal uses, that attract substantial visitor or user numbers will not be permitted unless they are on land specifically allocated for that use in this plan or are explicitly provided for under other plan policy."*

We would suggest that the Policy wording is made more permissive and cross-refers to sufficient sequential testing and a retail impact assessment. While this is clear when taken together with Policy SE07, when read in isolation it may result in misinterpretations by the decision-maker.

#### **Summary**

Aldi welcomes the opportunity to comment on the emerging East Devon District Council Local Plan and we trust this representation will be considered during the next stages of the plan preparation.

As a successful business, with intentions to expand its operations in the region further, Aldi is pleased

to be involved in the Local Development Plan process and to share their plans with the Council to deliver new jobs, inward investment and expanded access to healthy and cheaper food items, all in accordance with local planning policy.

We would welcome the opportunity to discuss the above matters further if this would be of any assistance and we reserve the opportunity to comment on later stages of the Plan, as appropriate. In the meantime, we look forward to receiving formal acknowledgement of the receipt of this representation in due course.

**AVISON  
YOUNG**

Yours sincerely



**Elliott Kelly (MRTPI)  
Associate Director**



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