

SUPPORTING PLANNING STATEMENT

Erection of a New Aldi Foodstore (Use Class A1); a Drive-Thru Unit (Use Class A3); Associated Car Parking Facilities Including an Electric Vehicle Charging Hub; Pedestrian Access Routes and Servicing; Landscaping; and Associated Site Works (including two electrical substations).

Plot 2A, The Airfields at South Camp, Welsh Road, Garden City, Deeside, CH5 2RD

On behalf of Aldi Stores Limited

May 2024

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Appendix 1 Schedule of Supporting Plans and Documents

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Report title: Supporting Planning Statement

Prepared by: JB / DB

Status: Rev 2

Date: 13 May 2024

For and on behalf of Avison Young (UK) Limited

1. Introduction

Site and Proposal

- 1.1 This Supporting Planning Statement (“SPS”) has been prepared by Avison Young (“AY”) on behalf of Aldi Stores Limited (“Aldi”) and submitted to Flintshire County Council (“FCC”) in support of a full planning application for the following development at Plot 2A, The Airfields at South Camp, Welsh Road, Garden City, Deeside, CH5 2RD (hereafter referred to as “the Site”):

“Full planning application for the erection of a new Aldi foodstore (Use Class A1); a drive-thru unit (Use Class A3); associated car parking facilities including an electric vehicle charging hub; pedestrian access routes and servicing; landscaping; and associated site works (including two electrical substations).”

Overview of Planning Case

- 1.2 The site extends to approximately 1.4 hectares and is situated in a prominent location on the B5441, Welsh Road. The site is located within an area earmarked by FCC in the adopted Local Development Plan for the provision of a new district centre to serve the growing ‘Garden City’ at The Airfields. The site comprises previously developed land and forms part of a much larger area that already benefits from outline planning permission (ref: 049320) for redevelopment to provide strategic employment and residential-led mixed-use development. This permission also explicitly includes provision of retail development as part of a new district centre.
- 1.3 Furthermore, reserved matters consent (ref: 064445) was granted on 18th October 2022 at the application site for the construction of a new district centre comprising 12 units for uses including food retail (Use Class A1) and food and drink (Use Class A3). The Officer’s Report for this reserved matters application found it necessary to condition the use of 11 of the 12 proposed units to *‘food and convenience’* uses only. This emphasises the importance that the Council places on the delivery of retail provision within the future centre that will serve the day-to-day food shopping needs of the area’s growing residential community. The permitted scheme has not proved deliverable and is no longer being progressed, but remains of relevance as a *‘fall-back’* position in planning terms given its extant nature.
- 1.4 A revised scheme comprising a discount foodstore (Aldi), drive-thru bakery (Greggs), and an electric vehicle charging hub is now proposed to reflect current market interest in the site and the changing economic context. The significant investment proposed by Aldi, Greggs and the EV charging operator will provide the opportunity to bring a long vacant site back into beneficial economic use, with the discount foodstore and drive-thru forming part of a new district centre which will help serve the day-to-day retail needs of The Airfields community. The proposed electric vehicle charging station will support the transition to electric vehicles and contribute to the UK government’s net-zero emissions target for 2050.
- 1.5 The proposed development will give rise to tangible economic benefits, including the creation of more than 50 full and part-time local jobs as well as various other indirect jobs in construction, supply chain, support, etc. Alongside these economic benefits, the scheme will enhance consumer choice and will provide further much-needed competition within the local food retail sector through the provision of a dedicated, proportionate foodstore for The Airfields community.
- 1.6 Finally, the scheme is eminently deliverable, with Aldi targeting construction of the scheme during early 2025 if planning permission is granted this year. Aldi and Greggs’ very presence is also anticipated to raise the profile of the site, investor confidence, and market interest in The Airfields’ remaining residential and employment development opportunities during a challenging economic period.

Purpose and Approach of Planning Statement

- 1.7 In accordance with the Welsh Town And Country Planning Act 1990 (as amended), this Planning Statement assesses the development proposals against relevant policies contained within the adopted Development Plan, key national planning policies, and all other relevant material considerations.
- 1.8 A comprehensive suite of documents and plans has been submitted in support of this application. A schedule setting out the suite of supporting documents and plans can be found at **Appendix I** of this Statement.
- 1.9 This Statement is structured as follows:
- **Section 2** provides a description of the application site and its surroundings;
 - **Section 3** sets out the details of the proposed development;
 - **Section 4** offers an overview of Aldi and outlines some of the key benefits that the business hopes to bring to Deeside;
 - **Section 5** contains an overview of local and national planning policy and guidance;
 - **Section 6** assesses the application proposals in the context of planning policy and guidance; and,
 - **Section 7** provides a summary and conclusions.

2. Application Site

- 2.1 This section of the SPS provides a detailed description of the site and surrounding area, its accessibility, environmental constraints and relevant planning history.

The Site

- 2.2 The application site area, as identified in the Location Plan at **Appendix II**, extends to approximately 3.49 acres / 1.41 hectares and is broadly rectangular in shape. The site, along with adjoining plots, have been the subject of site enabling works over the past few years comprising ground remediation and earthworks to create development platforms. Access roads and drainage infrastructure have already been delivered. The site is therefore entirely cleared of built form and vegetation and is currently awaiting development.
- 2.3 The proposed application site is located approximately 2.5km north of Queensferry district centre and will form part of a wider mixed-use development, "The Airfields", which first gained outline planning approval in 2013. The application site is referred to as Plot 2A in the Airfields Illustrative Masterplan, located on the eastern boundary of the 'Airfields and Northern Gateway development area'. The site fronts Welsh Road to the east and is located between the Airfields commercial spine road to the north and the recently constructed residential spine road to the south.
- 2.4 The land already benefits from permission for retail uses, and is allocated for a mix of commercial uses, including retail, in the recently adopted Flintshire Local Development Plan (Jan 2023). The closest existing foodstore of scale is the Asda superstore which anchors Queensferry district centre, some 2.7km south-west of the site.

Surrounding Area

- 2.5 The site's surrounding physical context is currently in a state of significant change, given that it forms part of a major development site which has been in the process of redeveloped for much of the past decade. Immediately north of the site is an unnamed commercial spine road and north of this is a 3ha development plot which benefits from outline permission for trade counter / industrial development. Meanwhile, north-west of the appraisal site is an Amazon distribution centre.
- 2.6 Bounding the appraisal site to the west (Plot 2B) is undeveloped land (circa 1.5ha) with outline permission for health, retail, creche and hotel uses. Meanwhile, further west and south-west of the of the site is recently constructed (and under construction) residential development.
- 2.7 To the south of the site is a residential spine road (unnamed) and beyond this a development plot (Plot 1) of some 2.5ha which has outline permission for a combination of retail, commercial, health, and leisure uses. However, the site's developer has discussed bringing forwards residential development on this land as an alternative, but there is currently no application forthcoming on this site and the latest position in relation to this possible use change is unknown.
- 2.8 To the east of the site is the A494, Welsh Road. Land further east comprises a small office / residential development and agricultural fields lie beyond.
- 2.9 Accordingly, it is clear that the site's surrounding context is largely commercial and residential in character, with undeveloped land taking the form of development platforms which are ready to accommodate either commercial, industrial, retail or residential uses (for which outline planning permission has already been granted).

Site Accessibility

- 2.10 The Airfields development benefits from excellent transport links for vehicles, pedestrians, and cyclists alike. The site is in close proximity to the A550 / A494 / A55 corridor, which creates a central spine through the area, allowing easy vehicular access to adjacent regions. The A494 (Welsh Road) provides a key arterial vehicular route between Ellesmere Port and Deeside, Wales.
- 2.11 The plot is located only 1.6 miles from Hawarden Bridge Train Station and is bordered by a National Cycling Route. The site is also highly accessible by bus, with various bus stops supporting the emerging Airfields and Northern Gateway development area.
- 2.12 Further details in connection with the application site's accessibility via various transport means can be found in the Transport Implementation Strategy prepared by Cameron Rose Associates.

Environmental Constraints

- 2.13 The site is not located in a Conservation Area and the closest identified listed building is circa 2km to the west ("John Summers listed buildings and grounds"). Heritage matters are therefore not of relevance to any future planning application on this plot.
- 2.14 Given that the site is cleared land, there are no TPO trees on or adjacent to the site. The site is located within an area of low risk for fluvial flooding and sea flooding. Flood risk will not therefore pose a direct constraint for future development; however, a detailed Flood Risk and Drainage Assessment has been prepared in support of the scheme by Hydrock and forms part of this planning application.

Planning History

- 2.15 A review of FCC's online planning register has been undertaken for the site. The most relevant applications are listed below.

Application Reference	Description	Decision
049320	Outline application for the redevelopment of a strategic brownfield site for an employment led mixed use development with new accesses and associated infrastructure including flood defences and landscaping.	Approved 07/01/2013
051282	Application for variation of condition 42 of planning permission (049320) to amend the timing for the submission of the land contamination information from 'Prior to the commencement of development' to 'Prior to the commencement of each phase being occupied'.	Approved 17/12/2013
054488	Reserved matters application for phase 1 of the highway works and associated infrastructure works following outline approval 049320 for a mixed-use development and associated infrastructure.	Approved 01/03/2016
057404	Application for approval of reserved matters following outline approval 049320 for phase one enabling works comprising an access road, surface water drainage,	Approved 18/02/2018

	landscaping and engineering works to create developments platforms.	
058990	Application for removal or variation of a condition following grant of planning permission (049320).	Approved 25/10/2018
058950	Application for approval of reserved matters phase 1 informal landscaping and POS following outline approval (049320).	Approved 13/03/2019
061125	Application for removal of conditions 26, 28, 30, 34 and 44 and variation of condition 13 following grant of planning permission (058990).	Approved 26/04/2021
064445	Application for approval of reserved matters following outline approval reference: 061125.	Approved 18/10/2022

- 2.16 The original outline planning permission (ref: 049320) was granted on 7th January 2013 for the redevelopment of a strategic brownfield site for an employment and residential-led mixed-use development with new accesses and associated infrastructure, including flood defences and landscaping. This permission included the provision of retail development as part of a new 'district centre' to serve the future residential community.
- 2.17 Following this outline planning permission there have been various Section 73 modifications to both remove and amend some of the original conditions. The first S73 (ref: 051282) was approved on 17th December 2013 to vary condition 42, a second S73 (ref: 058990) was approved on 25th October 2018 to remove conditions 7, 15, 16 and 17, and a third S73 (ref: 061125) was approved on 26th April 2021 to remove conditions 26, 28, 30, 34 and 44 and vary condition 13.
- 2.18 Various phases of the development have been subsequently implemented from the outline permission via successful reserved matters submissions. For example, both the commercial and residential spine roads have been built out, logistics buildings constructed, and residential dwellings also delivered over the past five years or so. The following reserved matters applications relevant to the application site have been submitted pursuant to the outline permission:
- Reserved matters (ref: 054488) approved on 1st March 2016 for commercial spine road Phase 1 highway works;
 - Reserved matters (ref: 057404) approved on 18th February 2018 for Phase 1 enabling works;
 - Reserved matters (ref: 058950) approved on 13th March 2019 for Phase 1 public open space.
- 2.19 Of greatest relevance is the reserved matters consent (ref: 064445) approved on 18th October 2022 for Plot 2A for the erection of a new district centre, proposing 12 units to provide retail, food and drink and health facilities. In terms of parking and highways, the reserved matters scheme provided 137 vehicle parking spaces, including 11 accessible spaces, 5 parent and child spaces and 8 electric vehicle charging spaces. The floor areas of the approved 12-unit scheme are as follows:
- Unit 1 (Food Store) 370sqm;
 - Units 2 to 8 (Retail or Food and Drink) 116sqm each;
 - Units 9 to 10 (Retail or Food and Drink) 185sqm each;

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- Unit 11 (Health) 372sqm; and,
 - Unit 12 (Drive-To Food and Drink) 158sqm.

2.20 The reserved matters consent (ref: 064445, October 2022) for the district centre scheme has not proved deliverable and is no longer being progressed, but remains of relevance as a 'fall-back' position in planning terms given its extant nature. A revised scheme comprising a discount foodstore (Aldi), drive-thru bakery (Greggs), and an electric vehicle charging hub is now proposed to reflect current market interest in the site and the changing economic context.

3. The Proposed Development

3.1 This section provides an overview of the proposed development's business format, layout, design, access and servicing arrangements.

3.2 This planning application seeks 'full' permission for the following development:

"Erection of a new Aldi foodstore (Use Class A1); a drive-thru unit (Use Class A3); associated car parking facilities including an electric vehicle charging hub; pedestrian access routes and servicing; landscaping; and associated site works (including two electrical substations)".

3.3 The proposals are located at Plot 2A, The Airfields at South Camp, Welsh Road, Garden City, Deeside, CH5 2RD.

3.4 As detailed in Section 2, the site already benefits from an extant outline planning permission and reserved matters consent (October 2022) for a district centre comprising a combined 1,700 sq.m of food retail (Class A1) and food and drink (Class A3) uses. The extant scheme has not proved deliverable in the current economic climate, with no end users identified. Notwithstanding this, the extant permission remains of relevance as a 'fall-back' position in planning terms, given that it could still be constructed at some point in the future in the absence of alternative development proposals.

3.5 The proposed development represents a revised scheme comprising a more proportionate foodstore, a drive-thru bakery unit in place of a drive-to restaurant, and an EV charging hub. The current proposals provide a wholly deliverable scheme, with the foodstore and bakery uses expected to form a key part of the new district centre. The scheme is eminently deliverable, with Aldi targeting construction of the scheme during early 2025 if planning permission is granted this year.

Specifics of the Development Proposals

3.6 Planning permission is required for the following;

- A new discount foodstore (Use Class A1) to be occupied by Aldi – Gross Internal Area ('GIA') 1,915 sqm, of which 1,356 sqm will be used as a retail sales floor area.
- A new drive-thru bakery unit (Use Class A3) to be occupied by Greggs – 167.2 sqm GIA.
- Associated car parking facilities for the district centre development comprising of 176 car spaces and 4 motorcycle bays:
 - 133 car parking spaces will serve the Aldi foodstore unit (Use Class A1). This includes 8 disabled spaces, 6 parent and child spaces, and 4 electric vehicle charging spaces ('EVCS'). There will also be 14 cycle spaces and 4 motorcycle spaces.
 - 25 parking spaces will serve the Greggs drive-thru unit (Use Class A1), and this will include 2 disabled spaces. The unit will also be served by 8 cycle spaces and 2 motorcycle spaces.
 - An Electric Vehicle Charging hub is proposed comprising 18 EVCS which will offer rapid charging capabilities.
- Landscaping works around the perimeter of the site as set out in the Proposed Landscaping Plan including tree, shrub, ornamental shrub and hedge planting, areas of flowering meadow mix, and areas of ornamental bark mulch surface finish.

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- Public realm works across the site comprising pedestrian access routes including pedestrian crossings and walkways.
- 3.7 The internal layout of the proposed Aldi foodstore is set out on the Proposed GA Plan supplied by The Harris Partnership ('THP'). The internal footprint of the foodstore will consist of a sales area, plant room, warehouse, night chiller, freezer store, meeting room, staff room, entrance/exit lobby, manager's office and accessible WC.
- 3.8 Immediately adjacent to the external elevations of the Aldi foodstore will include a plant enclosure bordered by a palisade fence to the southern (rear) elevation, a loading bay bordered by a 4m high acoustic barrier to the western (side) elevation, and a trolley bay to the northern (front) elevation. Further details of these acoustic barriers are discussed in the policy compliance section of this report and the submitted Noise Impact Assessment prepared by Spectrum Acoustic Consultants.
- 3.9 The proposed Greggs drive-thru unit will incorporate a bin store to the western elevation and plant to the northern elevation. A further bin store is proposed to the northwest of the unit and external seating is proposed immediately adjacent to the west of the unit. 2no. grill waiting bays will be located to the south of the unit accessed of the drive-thru road.
- 3.10 Finally, it should be noted that two single-storey electrical sub-stations form part of the scheme and will be positioned close to the north-western corner of the site.

Overview of Aldi Discount Foodstore Format / Business Model

- 3.11 In terms of format, the proposed Aldi foodstore will have a GIA of 1,915 sqm and a net trading area of 1,356 sqm. The trading floorspace within every Aldi store is consistent at around 1,200 sqm to 1,400 sqm. This is to enable the range of identical products sold within each Aldi store to be arranged and displayed on a consistent basis. The gross floor area of new Aldi stores (i.e. the trading floorspace plus back of house area) varies slightly within a range of approximately 1,700sqm to 2,000sqm. Again, the aim is to ensure that the stores are built to a consistent specification in order to facilitate efficient delivery and distribution of products to each Aldi store in the portfolio.
- 3.12 With regards the nature of the food retail development proposed, it is significant that Aldi operate as a 'deep-discount' retailer. This essentially means that the number of core food product lines stocked within each Aldi store is identical and deliberately restricted to around 2,000. This is in stark contrast to the 20,000+ product lines that you would find in a superstore operated by one of the UK's 'mainstream' convenience retailers and is the reason why all Aldi foodstore's are of a uniform size and format.
- 3.13 The core retail offer within an Aldi store (approximately 80% of the net sales area) seeks to replicate the most regularly purchased items within a family's weekly or 'bulk' food shopping trip. The vast majority of products stocked are Aldi branded and through economies-of-scale these goods can be sold at heavily discounted prices without impacting upon quality. Stock is generally presented on pallets or shelves within display ready packing cases to aid efficiency and reduce unnecessary overheads. Savings which can then be passed directly on to the consumer.
- 3.14 Aldi's focus on the key products that typically make up 'bulk' food shopping trips means that they do not sell certain 'ancillary' lines that are normally found in mainstream supermarkets, including tobacco. In addition, there is no staffed butchery, fishmonger, delicatessen or hot food-counter, and Aldi's foodstore format does not accommodate customer restaurants or in-store franchises such as a Post Office, dispensing pharmacy, dry-cleaning, opticians, betting office or photo processing. These factors are important when considering the trading effects of an Aldi foodstore; as clearly in Aldi's case the potential for cross-over with the offer of independent high-street retailers is far less than it is for 'mainstream' food retailers that stock a far wider spectrum of goods.

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- 3.15 Notwithstanding the above, the Aldi foodstore, as with all modern supermarkets, will also stock a very limited range of non-food goods (approximately 20% of the net sales area). The range of non-food goods in an Aldi store is purely ancillary to the food offer in floorspace terms, and it is also significant that the products stocked mirror seasonal demand such that there is a constant variety in terms of range and choice, with no particular type of comparison goods predominating. In this fashion, the potential for an Aldi foodstore to compete with high-street retailers is extremely limited.

Layout

- 3.16 The proposed site layout is informed by the design parameters of the site, such as the existing site access from the unnamed commercial spine road, the positioning of underground services and direction of principal views into the site.
- 3.17 With the differing uses on the site, spatial legibility is important to facilitate easy customer navigation. The foodstore, drive-thru and EVCP hub occupy distinct areas of the site, all clearly visible from the site entrance. Each building has been positioned to provide active frontages from key vantage points.
- 3.18 The scheme has been designed to facilitate easy pedestrian movement. All accessible parking and P&C bays are positioned in close proximity to unit entrances and key pedestrian routes have been implemented from Welsh Road and across the site.
- 3.19 The internal layout and operation of an Aldi store is designed to be efficient and practical for use by customers; these matters are routinely reviewed and monitored, and adjustments made to the model as required. It is also designed to be accessible by all. Its design reflects the company philosophy of offering unrivalled value for money through cost effective management. There is no unnecessary expenditure on elaborate shop fittings, with the resultant savings being reflected in low prices. Merchandise is sensibly displayed in specially designed cases to eliminate stocking time and allow easy and efficient re-stocking. Aldi make enormous efficiency gains in this area and passes the savings directly to the customer.
- 3.20 The proposed Aldi foodstore will sit well within its context and the scale of the store is minimised through the 'blade roof' which gives the store a single-story appearance.
- 3.21 The scale of the proposed drive-thru has been driven by the objective to address local need and meet customer expectations. In design terms, the relationship of the site and the development within its setting is an important consideration. Taking this into account, the single storey proposals will provide a development of similar scale and massing, if not lower than the existing properties in the vicinity. It will also be very much comparable to the drive-to restaurant which was approved as part of the still extant reserved matters consent for a district centre on the application site.

Design

- 3.22 A Design and Access Statement (prepared by The Harris Partnership) has been submitted to accompany this application which sets out the materials specification for the foodstore and drive-thru units.
- 3.23 A simple palette of materials is proposed for the Aldi foodstore. With a crisp contemporary style, in order to complement the adjacent units in the Airfield Development.
- 3.24 The proposed Aldi store comprises of a combination of charcoal brickwork plinth, anthracite grey trapezoidal cladding and metallic silver trapezoidal cladding, which will complement the modern aesthetic in the Airfield Development. The use of glazing to the unit's southern elevation will offer views

into the sales area for passers-by along Welsh Road, adding interest to this elevation and creating an inviting, active frontage to the scheme at the focal point of the new district centre.

- 3.25 The principal facades (north and east elevations) utilise metallic silver trapezoidal cladding as the primary material broken up with anthracite grey features, including expansive glazing and a canopy that highlights the store entrance, and creates an active frontage to the unit.
- 3.26 A simple palette of materials is utilised again on the drive-thru unit, which features anthracite grey cladding, with blue accents, to reflect the occupier's brand identity.
- 3.27 Throughout both the external site and the internal store, dual signage signage will be utilised. This will include directional, store specific information such as opening times, and point of sale signage.
- 3.28 In summary, the proposed foodstore unit will be of a contemporary design with a strong horizontal emphasis and constructed using modern methods and materials. The building will be of steel framed construction and will incorporate, in addition to glazing, a high-quality cladding to provide a clean, modern finish. This materials palate is reflective of the architectural aesthetic of surrounding buildings already apparent in The Airfields development area. A comprehensive overview of the scheme's design rationale is set out in detail in the accompanying Design and Access Statement.

Landscaping

- 3.29 In relation to landscaping, proposed native species trees and other landscaping will be added to the site to enhance the existing landscape and provide low maintenance to the area. The hard and soft landscaping within the development boundary will be enhanced by pedestrian routes and native planting, providing interest to the site.
- 3.30 In terms of boundary treatments for the Aldi foodstore, a palisade fence surrounding the plant enclosure is proposed to the southern (rear) elevation of the store. In addition, a 4m high acoustic barrier fence is proposed to the western (side) elevation adjacent to the west of the loading bay, and a 2.4m high close boarded timber fence is proposed along the western site boundary.
- 3.31 Full details of the scheme's approach to landscaping is provided in the Design and Access Statement prepared by The Harris Partnership. This is also detailed on the Proposed Landscaping Plan and Boundary Treatments Plan.

Access and Parking

- 3.32 The existing access point into the site is via the existing junction from the unnamed commercial spine road connecting the Airfields development to the B5411 (Welsh Road), constructed as part of the enabling works to the site. The site benefits from easy access to the local highways network.
- 3.33 22 electric vehicle charging spaces have been provided site-wide, with 4 bays adjacent to the Aldi foodstore and 18 rapid chargers as part of a dedicated electric vehicle charging hub.
- 3.34 The site is well connected via public transport links with Hawarden Bridge Train Station located only 1.6 miles away and the 'Deva Business Park' bus stop is located directly adjacent to the site on Welsh Road. The bus stop is on routes 5, 811 and D1, providing easy access to Holywell, Broughton, Mold and Ellesmere Port.
- 3.35 Facilitating easy pedestrian access has been a key consideration in the design. Two new footpaths from Welsh Road have been provided and pedestrian access across the site prioritised.

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- 3.36 The scheme has been designed so that accessible parking bays and parent and child spaces are located in close proximity to unit entrances. All pedestrian crossing locations will have dropped kerbs and will incorporate tactile paving to aid visually impaired visitors.
- 3.37 All the buildings will be designed to be fully DDA compliant in respect to internal facilities including entrance lobby areas, WCs and door widths etc. The development will also comply with the Equality Act 2010 which brings together and replaces existing equality legislation including the Disability Discrimination Act 1995 ('DDA').
- 3.38 Further details in connection with the application site's parking provision and accessibility via various transport means can be found in the Transport Implementation Strategy prepared by Cameron Rose Associates.

Hours of Operation

- 3.39 Aldi's foodstores are open seven days per week (including the majority of Bank Holidays) but the company does not promote 24-hour trading, as is the case with many of the UK's other 'mainstream' food retailers. Accordingly, Aldi could accept a planning condition setting out minimum opening hours of:
- 08:00 hours to 23:00 hours – Mondays to Saturdays; and,
 - 09:00 hours to 18:00 hours – Sundays
- (Note – Sunday trading laws mean that the Aldi store can only open for up to six hours on a Sunday. This will typically be 10:00 hours to 16:00 hours.)

Servicing

- 3.40 Servicing access will be taken from the spine road immediately north of the site utilising the same vehicular access point as provided for customer traffic. The servicing area will be located adjacent to the Aldi store's western elevation, ensuring that HGV movements within the site are minimised and that servicing does not detract from the principal frontage to Welsh Road. This will incorporate a delivery ramp, sheltered canopy, and dock leveller system which means products can be unloaded without any external activity, such as forklift trucks, scissor lifts or cages. Servicing is therefore a much swifter and quieter process than it is for larger mainstream foodstores with a traditional 'service yard' arrangement.
- 3.41 In terms of the servicing procedure itself, in the case of Heavy Goods Vehicle ('HGV') deliveries, this would typically take 30 - 60 minutes and is a straightforward exercise given that Aldi's stock is delivered on pallets which are simply rolled into the warehouse, utilising the automated dock levelling system. Furthermore, as part of Aldi's delivery process the responsibility for the unloading of a servicing vehicle rests with its driver. As such, there is no potential for delay in the process as it is not necessary to wait for store staff to deal with the vehicle on its arrival (as is the case with many other mainstream convenience retailers). Goods deliveries will be received to the 'back of house' area which will be accommodated in the south and eastern parts of the Aldi foodstore.
- 3.42 It is anticipated that the Aldi foodstore will receive an average of four HGV deliveries per day. Three articulated HGV deliveries per day come from the Regional Distribution Centre (RDC) and there is one delivery per day of milk by a local supplier, usually using a medium sized goods vehicle. Daily deliveries of milk, bread and morning fresh produce are received prior to, or as early as possible after, the store opening in the morning, and are delivered by one Aldi HGV and one milk delivery vehicle.

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- 3.43 All Aldi delivery vehicles are equipped with Reversing Cameras and Audible Warning Systems enabling the driver and customers to be aware of the reversing vehicle. Where required, a trained 'Pedestrian Marshal' is utilised by the store to guide pedestrians in a safe manner whilst a service vehicle is manoeuvring. HGV access to the service area has been designed to accommodate the required turning manoeuvres of the largest servicing vehicle in Aldi's fleet (a 16.5m articulated goods vehicle) and a 'swept path analysis' is presented as part of the Proposed Site Layout Plan showing this entering and leaving the site safely and in forward gear.
- 3.44 Deliveries will be required on every day that the foodstore is open for trade to ensure the availability of fresh produce, including Sundays and Bank Holidays¹. Accordingly, the applicants are seeking to negotiate through an appropriately worded planning condition minimum servicing hours at the discount foodstore of:
- 06:00 hours to 23:00 hours – Mondays to Saturdays; and,
 - 08:00 hours to 18:00 hours – Sundays.
- 3.45 The accompanying Noise Impact Assessment prepared by Noise Solutions Limited justifies the servicing hours proposed across the development.

Summary

- 3.46 In summary, the proposed development for a new 1,915 sqm GIA Aldi foodstore (Use Class A1), and a new 167 sqm GIA Greggs drive-thru unit (Use Class A3), with associated car parking will promote a contemporary design that will sit comfortably within its context and add value to the local area. Full details regarding the design of the Aldi foodstore and Greggs drive-thru unit (and the proposed materials palette) are contained in the plans and elevations submitted with this application as detailed in the accompanying Design and Access Statement, which should be referred to for further design related information.
- 3.47 As explained as part of the above commentary, the site already benefits from an extant outline planning permission and reserved matters consent (October 2022) for a district centre comprising a combined 1,700 sq.m of food retail (Class A1) and food and drink (Class A3) uses. The extant scheme has not proved deliverable in the current economic climate, with no end users identified, but remains of relevance as a 'fall-back' position in planning terms, given that it could still be constructed at some point in the future in the absence of alternative development proposals.
- 3.48 The proposed development represents a revised scheme comprising a more proportionate foodstore, a drive-thru bakery unit in place of a drive-to restaurant, and an EV charging hub. The current proposals provide a wholly deliverable scheme, with the foodstore and bakery uses expected to form a key part of the new district centre for The Airfields. The scheme is eminently deliverable, with Aldi targeting construction of the scheme during early 2025 if planning permission is granted this year.

¹ It should be noted that the majority of Bank Holidays are treated as a typical trading day by Aldi and as such standard Monday to Saturday opening and servicing hours are observed. However, all Aldi stores are closed on Easter Sunday, Christmas Day, Boxing Day and New Year's Day.

4. Overview of Aldi

- 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 1,000 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. This is evidenced by the below chart published by independent consumers' association 'Which?' in March 2020. The chart compares the average cost of a trolley of 108 groceries and household essentials (i.e. a bulk food shopping trip) and shows, for example, that an equivalent shop at a mainstream foodstore such as Tesco, Morrisons or Sainsbury is at least 27% more expensive.



Figure 1: Chart Comparing Average Cost 108 Groceries and Household Essentials (Source: 'Which?' March 2020)

- 4.3 Aldi regularly receives industry awards recognising the quality of its products and customer experience. Aldi was voted the nation's Favourite Supermarket and Favourite Wine Retailer at the 2019 Good Housekeeping Food Awards; named Best Value Supermarket at the Moneywise Home Finances Awards 2019; and Best Grocer at the Retail Week Awards 2019. For recognition of investment in people, Aldi was crowned Employer of the Year at The Grocer Gold Awards 2017, whilst they were named Grocer of the Year at The Grocer Gold Awards 2018.

How Aldi is Different

- 4.4 Aldi has a very different approach to food retailing than other food retailers based on simplicity and maximum efficiency at every stage of the business, from supplier to customer. This enables Aldi to sell high quality products, from a limited core range (compared to other supermarkets) of mainly exclusive own labels, at the lowest possible price consistently across the entire range. Aldi is a 'deep discount' retailer.
- 4.5 The key aspects of the trading philosophy include:
- Maximum operational efficiency and cost control;

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- 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 the sales area are uniform, in order to accommodate bulk food displays and provide the operational efficiency that a discount foodstore requires. These efficiencies are found across the entire operation from supplier to retail store and result in an enviable cost structure which allows Aldi to sell quality food at low prices and operate on much smaller margins than other foodstores.
- 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 (c.90%) which do not include costs that the national brands pass on through higher prices. This allows Aldi to gain a significant cost advantage over competitors without compromising quality.
- 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 the larger supermarkets which stock in the region of 20,000 - 40,000 product lines, and more modest sized operators, with floor areas of 1,000 - 1,500sqm selling 2,500 - 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.

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- 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 the trading philosophy. Aldi complement, rather than compete with, existing local traders, independent retailers and other supermarkets, as well as service providers, as Aldi customers use other facilities to fulfil their grocery and local service needs. This generates a propensity for linked trips and associated spin-off trade which brings qualitative benefits.

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 foodstore's 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 foodstore's 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. The external design has evolved over time and now the design for each store is consistent across Aldi's portfolio, promoting modern, smart buildings 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. Currently Aldi stores operate 0800 to 2200 / 2300 Monday to Saturday and for six hours between 1000 to 1800 on Sundays, to comply with Sunday Trading Laws. As Aldi stores are located in 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 between 40 - 50 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 foodstore's 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 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.
- 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 that are 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.
		Detailed Specification of energy saving fitting for refrigeration system.
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.
		One twin-headed Faster Charger for Electric Vehicles will be provided at all new stores with two dedicated parking bays. Ducting to a further four bays for potential future use.
Water Conservation	Water Use within the Retail	A pulsed water meter would be proposed for the development to monitor water use.
		2/4 litres WC's in retail store.

and Management	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.
		All insulation materials and refrigerants have an ODP value of 0 and a GWP of 5 or less.
		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.

Heat Recovery System (Re-Usable Energy)

- 4.31 Perhaps the most significant sustainability feature which is provided as standard on all new Aldi foodstore's 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. This system provides 100% of the total building heating demand. The heat recovery system has totally removed the need for an independent gas heating system. 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.
- 4.34 To demonstrate the effectiveness of this system, Aldi have used a typical model in Leicester which, being in the Midlands, represents the average for the whole of the UK. The typical energy demand for an Aldi Development in the Midlands is 271,624 kwh per year. The total energy demand for heating to an Aldi Store is 115,416 kwh. The refrigeration installation would generate 150,000 kwh which is more than sufficient to heat all the store.

4.35 With all the energy demand required to heat the building, being recovered from re-usable energy, 115,416 kwh of the total energy demand for the building of 271,624 kwh is generated from re-usable energy. This represents over 40% of the energy demand for the development being created by re-usable energy. Whilst it is acknowledged that this system is not technically a form of 'renewable energy', it results in the foodstore being exceptionally efficient in terms of the off-site energy requirements. This is a more environmentally friendly approach than an otherwise inefficient building that benefits from a limited on-site renewable energy source.

5. Planning Policy Context

- 5.1 This section of the Statement sets out the key planning policies at the national and local level which are relevant to the determination of the planning application. The application proposals are evaluated in the context of the relevant policies identified in the later sections of the SPS.
- 5.2 Welsh planning legislation states that decisions should be made in accordance with the Development Plan, unless material considerations indicate otherwise.
- 5.3 The statutory Development Plan against which this application should be determined comprises:
- Flintshire Local Development Plan 2015 – 2030 ('FLDP'), adopted 24th January 2023
 - Future Wales: The National Plan 2040 ('NP'), adopted 24th February 2021
- 5.4 Alongside the Local Plan (the Development Plan), there are other local and national 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:
- SPGN No 3. Landscaping
 - SPGN No 11. Parking Standards
 - TAN4: Retail and Commercial Development
 - TAN12: Design

Development Plan

Flintshire Local Development Plan (2023)

- 5.5 **Policy STR1: Strategic Growth** – This policy states that in order to meet Flintshire's economic ambition between 2015 and 2030, the Plan will make provision for:
- 8,000 – 10,000 new jobs;
 - 124.97 hectares of employment land;
 - 7,870 new homes to meet a housing requirement of 6,950, of which 2,265 will be affordable.
- 5.6 The focus of this development will be at sustainable employment locations and in accordance with the sustainable settlement hierarchy and spatial distribution strategy.
- 5.7 **Policy STR2: The Location of Development** – This policy outlines that new development will be directed to the following locations:
- Allocated Sites;
 - Principal Employment Areas as detailed in policy PE2;
 - Sustainable settlements based on the first three tiers of the settlement hierarchy.

5.8 **Policy STR3A: Strategic Site: Northern Gateway Mixed-Use Development Site: Employment, Housing, Commercial, Community facilities** – This policy states that the majority of new development in Flintshire during the Plan period will be provided by a combination of commitments and new sites located in accordance with the sustainable settlement hierarchy. The planning application site is allocated as forming part of a key strategic site that will make an important contribution to the overall provision for growth in Flintshire over the Plan period. The Northern Gateway Mixed-Use Development Site (or “The Airfields”) will provide:

- i. 1,325 new homes, including affordable
- ii. 72.4 hectares of B2/B8 employment land
- iii. Commercial development hub adjacent to A550
- iv. District Centre(s) to serve local convenience needs
- v. Strengthened and raised River Dee flood defences
- vi. Provision of internal road infrastructure
- vii. Provision of land and a contribution to extending Sealand CP School
- viii. Sustainable drainage/flood management solution
- ix. Provision of green infrastructure network
- x. Sensitive re-use of John Summers Listed buildings and grounds

5.9 **Policy STR4 – Principles of Sustainable Development, Design and Placemaking** – this policy states that to promote and create new sustainable places, all development will be designed to a high standard in line with the sustainable placemaking design principles and should achieve local distinctiveness, be inclusive and accessible, and mitigate and adapt to climate change. To achieve this, all development should:

- i. Be designed to be adaptable, safe and accessible, to respond to climate change, and for housing, adapt to changing needs over time;
- ii. Respond to local context and character, respect and enhance the natural, built and historic environment, and be appropriate in scale, density, mix, and layout;
- iii. Be accessible and connected, allowing ease of movement;
- iv. Make the best use of land, materials and resources;
- v. Contribute to the well-being of communities, including safeguarding amenity, the public realm, provision of open space and recreation, landscaping and parking provision in residential contexts;
- vi. Incorporate new, and connect to existing green infrastructure, promoting biodiversity;
- vii. Incorporate where possible on-site energy efficiency and renewable energy generation;
- viii. Ensure there is capacity and availability of infrastructure to serve new development;
- ix. Manage water and waste sustainably;

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- x. Ensure that it supports and sustains the long term wellbeing of the Welsh language.

5.10 **Policy STR5: Transport and Accessibility** – this policy outlines that sustainable economic growth and development can only be delivered by the maintenance and enhancement of an integrated, accessible, usable, safe and reliable transport network. The development of Flintshire’s transport infrastructure therefore underpins the Council’s economic ambition and in turn, informs the provision of a sustainable pattern of development. Where appropriate, new development and associated transport infrastructure should therefore:

- i. Facilitate accessibility to employment, homes, services, and facilities by locating development in places with access to integrated transport infrastructure, thereby reducing the need to travel;
- ii. Promote the implementation of an integrated transport solution in Flintshire, involving road, rail, bus, park and ride / share and active travel improvements;
- iii. Promote road and rail improvements to support Flintshire’s sub-regional role as a strategic gateway and hub;
- iv. Ensure that the local highway network either has, or can be upgraded, to provide capacity to accommodate sustainable levels of development;
- v. Facilitate improvements to the quality, attractiveness and availability of public transport options;
- vi. Provide walking and cycling routes, linking in with active travel networks and green infrastructure networks;
- vii. Adopt a sustainable approach to the design, function and layout of new development, including providing appropriate levels of parking;
- viii. Support the movement of freight by rail or water.

5.11 **Policy STR6: Services, Facilities and Infrastructure** – This policy states that an essential element in planning for sustainable places is to ensure that the physical and social infrastructure exists, or can be provided, to ensure that when and where development occurs, it can be sustainably accommodated within communities. Delivered through a combination of recognised infrastructure providers, public organisations, and private investment, new development will contribute to the provision of a range of key infrastructure, where necessary to mitigate the impacts of new development, comprising:

- i. Affordable housing;
- ii. Green infrastructure including open space and play space;
- iii. Education and health facilities;
- iv. Highways, walking and cycling and public transport improvements and electric vehicle charging points;
- v. Ecological mitigation;
- vi. Water management (supply, drainage, treatment);
- vii. Electricity and gas;

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- viii. Telecommunications and Broadband;
 - ix. Community and town centre facilities;
 - x. Public realm and public art.

5.12 **Policy STR7: Economic Development, Enterprise and Employment** – This policy sets out that in order to sustain Flintshire’s role as a sub-regional economic hub, the Plan will support this by:

- i. Facilitating the delivery of jobs from key strategic sites at Northern Gateway, Deeside, and Warren Hall, Broughton;
- ii. Providing a range of general employment sites to enable a range of businesses to start-up, invest, innovate, expand and grow, benefitting from Flintshire’s strategic location and positive quality of life;
- iii. Emphasising Deeside and its area of influence as the economic focus for Flintshire’s long term economic ambition;
- iv. Providing the opportunity to realise the creation of 8-10,000 jobs in key sectors, over the plan period;
- v. Supporting the role of Flintshire’s main towns as Main Service Centres, providing a range of employment, retail, leisure development, and services and facilities that are accessible to the wider communities they serve;
- vi. Supporting development related to the provision of higher/further education facilities which offer vocational skills training and direct links to key employers;
- vii. In rural areas, recognise the continued contribution agriculture makes to the rural economy, whilst also supporting wider rural enterprise, tourism and diversification;
- viii. Supporting the widespread provision of high speed broadband infrastructure across Flintshire, as well as consistent telecommunications connectivity.

5.13 **Policy STR8: Employment Land Provision** – This policy states that a strategic and local supply of employment land is identified to satisfy the County’s employment needs. Economic development will be guided to the most appropriate locations by providing a range and choice of sites in terms of location, quality, type and size which will comprise:

- i. Land currently committed for employment uses;
- ii. Undeveloped land and existing premises within Principal Employment Areas;
- iii. Employment land allocations including two key strategic sites of sub-regional significance referred to in Policies STR3, and STR7;
- iv. The safeguarding of existing employment sites and premises, where they play an important role in meeting future economic needs;
- v. Land and sites outside settlement boundaries, allocated sites, and Principal Employment Areas which can deliver sustainable employment development through the re-use of suitable buildings and land.

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- 5.14 **Policy STR9: Retail Centres and Development** – This policy states that retail developments will be guided by the County Retail Hierarchy. This approach will seek to maintain and enhance the vibrancy, viability and attractiveness of Flintshire’s town, district, and local centres, supporting the delivery of appropriate comparison and convenience retail, office, leisure, entertainment and cultural facilities. Retail centres will be the preferred location for new retail, leisure, office, social and other town centre uses. Major development will need to comply with the ‘town centres first’ principles within PPW in terms of the Needs Test, Sequential Test and Retail Impact Assessment. Given the changing role of town centres, both Town Centre and Primary Shopping Areas are defined in recognition of the need for a degree of flexibility in maintaining occupancy and footfall, and to enable a tailored approach to be taken for each centre having regard to health checks, masterplans and action plans.
- 5.15 **Policy STR14: Climate Change and Environmental Protection** – This policy sets out that the Council will seek to mitigate the effects of climate change and ensure appropriate environmental protection in the County through:
- i. Ensuring new development is sustainably located and designed so as to reduce the need for travel by private car;
 - ii. Encouraging the use and development of appropriate or suitable brownfield land;
 - iii. Adopting a sustainable approach to water resource management including supply, surface water run-off and waste water treatment;
 - iv. Directing development away from flood risk areas, assessing the implications of development in areas at risk of flooding and ensuring that new development does not increase the risk of flooding elsewhere;
 - v. Encouraging energy efficient development, environmentally acceptable renewable and zero / low carbon energy generation and combined heat and power and communal / district heating networks;
 - vi. Ensuring that new development has regard to the protection of the environment in terms of air, noise and light pollution, unstable and contaminated land and former landfill sites;
 - vii. Designing development to be adaptable and resilient to future effects of climate change.
- 5.16 **Policy PC1: The Relationship of Development to Settlement Boundaries** – This policy sets out that new development will be permitted within settlement boundaries as defined on the Proposals Maps, on allocations and within Principal Employment Areas subject to complying within other Plan policies.
- 5.17 **Policy PC2: General Requirements for Development** – This policy sets that all development should:
- a. harmonise with or enhance the character, local distinctiveness and appearance of the site, existing building(s) and surrounding landscape/ townscape;
 - b. not have a significant adverse impact on the safety and living conditions of nearby residents, other users of nearby land/property, or the community in general, through increased activity, disturbance, noise, dust, vibration, hazard, or the adverse effects of pollution;
 - c. take account of personal and community safety and security in its design and layout;
 - d. maximise sustainable travel choice by having safe and convenient access by foot, cycle, public transport and vehicles;

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- e. not have an unacceptable effect on the highway network or highway safety as a result of problems arising from traffic generation, inadequate and poorly located parking spaces, servicing and manoeuvring;
 - f. not result in or be susceptible to problems related to foul and surface water drainage, land stability, contamination, flooding, or pollution of light, air and water, either on or off site.

5.18 **Policy PC3: Design** – This policy sets out that all new development should:

- a. be of a high quality, distinctive and inclusive design which respects and enhances the site and its surroundings in terms of its siting, layout, scale, height, design, density, use of materials and landscaping, and creates a sense of place;
- b. retain existing landscape and nature conservation features and incorporate opportunities to enhance biodiversity and ecological connectivity;
- c. ensure that new materials are appropriate, durable and sympathetic to the character and context of the site;
- d. protect and enhance the townscape, architectural, historic and cultural built environment;
- e. incorporate suitable provision of space about dwellings, amenity space, landscaping and planting;
- f. create attractive, accessible and safe and healthy places with natural surveillance, visibility and sensitive lighting;
- g. incorporate Sustainable Urban Drainage Schemes to bring about multiple benefits as an integral part of the development;
- h. protect the living conditions of nearby occupiers from any harmful effects of new development including overlooking, harm to outlook, increased activity/disturbance/noise.

5.19 **Policy PC4: Sustainability and Resilience of New Development** – This policy states that development should:

- a. be sustainably located and accessible to non – private car means of travel, so as to reduce carbon emissions;
- b. be designed so as to be resilient and adaptable to the effects of climate change;
- c. incorporate planting, landscaping and design features within a Sustainable Management of Natural Resources (SMNR) approach which mitigate the effects of climate change such as increased rainfall events and high temperatures;
- d. make efficient use of resources through sustainable construction techniques and materials, including layout, siting and orientation to maximise solar gain, water conservation and waste reduction; and e. incorporate renewable energy technologies and carbon sinks where appropriate.

5.20 **Policy PC5: Transport and Accessibility** – This policy states that new development proposals must be supported by appropriate transport infrastructure, and depending on the nature, scale, location and siting of the proposal, will be required to:

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- a. Incorporate good access to the more sustainable modes of travel, firstly by walking and cycling, secondly by public transport, then by low emission private vehicle and finally by private motor vehicle;
 - b. not compromise the safe, effective and efficient use of the highway network and not have an adverse impact on highway safety or create unacceptable levels of traffic generation;
 - c. where significant adverse effects upon the transport network arising from the proposed development are unavoidable, they must be mitigated by, for example, improvements to transport infrastructure and traffic management;
 - d. provide appropriate levels of parking, servicing and manoeuvring space and in non-residential development, a minimum of 10% of parking spaces to have electric vehicle charging points;
 - e. create well designed people orientated streets and make provision for people with restricted mobility including those with characteristics as defined by the Equality Act 2010;
 - f. safeguard, enhance and expand the active travel network, particularly by means of improving connectivity to and from the proposed development.

5.21 **Policy PC6: Active Travel** – This policy outlines that new development should ensure that people have access to employment, education, healthcare and other essential services and facilities. Proposals should wherever possible:

- a. provide appropriate walking and cycling routes being an integral part of the scheme and connecting the development with key destinations;
- b. provide infrastructure and facilities that promote walking and cycling such as signing, lighting, secure and convenient cycle storage and parking and where appropriate, shower and changing facilities;
- c. provide appropriate travel choice information relating to cycling and walking for all or part of journeys as part of Travel Plans;
- d. incorporate measures to reduce the dominance and speed of vehicles affording increased priority to pedestrians and cyclists;
- e. develop and enhance the Active Travel routes identified on the Integrated Network Map connecting communities to essential services including public transport, employment and education opportunities;
- f. incorporate existing public rights of way as an integral part of the design and layout of the development.

5.22 **Policy PE1: General Employment Land Allocations** – This policy states that sites including STR3A Northern Gateway Mixed Use Development Site lies within Deeside Enterprise Zone and is allocated for B1, B2 and B8 uses.

5.23 **Policy PE7: Retail Hierarchy** – This policy sets out that retail, leisure and commercial development will be directed towards the following hierarchy as identified on the proposals map.

- Town Centres, District Centres, Local Centres (including Garden City Welsh Road).

5.24 Proposals will be supported where they are appropriate in scale and type for a particular centre.

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- 5.25 **Policy EN14: Flood Risk** – This policy sets out that in order to avoid the risk of flooding, development will not be permitted:
- a. in areas at risk of fluvial, pluvial, coastal and reservoir flooding, unless it can be demonstrated that the development can be justified in line with national guidance and is supported by a technical assessment that verifies that the new development is designed to alleviate the threat and consequences of flooding;
 - b. where it would lead to an increase in the risk of flooding on the site or elsewhere from fluvial, pluvial, coastal or increased surface water run-off from the site;
 - c. where it would have a detrimental effect on the integrity of existing flood risk management assets;
or
 - d. where it would impede access to existing and proposed flood risk management assets for maintenance and emergency purposes.

Future Wales: The National Plan 2040 (2021)

- 5.26 **Policy 20: National Growth Area – Wrexham and Deeside** – this policy sets out that Wrexham and Deeside will be the main focus for growth and investment in the North region. Strategic and Local Development Plans across the region must recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing and transport infrastructure. The Welsh Government will work with regional bodies and local authorities in the region and in neighbouring regions of England to promote and enhance Wrexham and Deeside's strategic role and ensure key investment decisions support places in the National Growth Area and the wider region.

Other Material Considerations

- 5.27 At a national level, technical advice notes (TANs) provide detailed planning advice. Local planning authorities take them into account when they are preparing development plans.
- 5.28 FCC has existing adopted Supplementary Planning Guidance Notes (SPGN) which currently hold considerable weight and are material considerations in the determination of planning applications.

SPGN No.3 Landscaping (2017)

- 5.29 FCC adopted the SPGN No.3 Landscaping on the 17th January 2017. This guidance note clarifies the Council's landscape expectations when assessing development proposals in order to help applicants to have a better understanding of landscape issues when formulating a planning application.
- 5.30 For commercial and industrial sites, the landscape design issues affecting these types of development are distinct from those of residential developments and will require different design solutions to integrate the development with its surroundings. Buildings on these developments tend to be large with associated extensive areas of car parking. The external layout together with boundary treatment plays a significant part in the successful design of these sites.
- 5.31 Trees retained or strategically planted in car parks and in open areas on the perimeter of industrial areas help break up the outline of large buildings viewed from outside the site. A typical approach is to screen the development from view but this is often impractical since certain commercial sites will want maximum exposure to attract passing trade. There is therefore potential conflict with landscape design solutions and under these circumstances high quality building can make a positive contribution in the

absence of boundary landscaping. In such instances, landscape design should enhance the setting of the built form rather than screening the development from view.

SPGN No.11 Parking Standards (2017)

5.32 FCC adopted the SPGN No.11 Parking Standards on the 17th January 2017. This guidance note explains the approach the Council will take when dealing with proposals which involve the need for new or additional parking provision.

5.33 The maximum motor vehicle parking standards for new development are as follows:

- For A1 shops, food retail less than 2,500sqm GFA, 1 car space per 14sqm GFA is required.
- For A3 food and drink, fast food drive through, 1 car space per 7.5sqm net GFA is required.

5.34 The minimum cycle parking standards for new developments are as follows:

- For food supermarkets, 1 space per 150sqm GFA (or part thereof) is required.

5.35 Motorcycle parking standards are in addition to those for pedal cycles and should be provided at sites requiring a maximum parking provision of 25 or more car parking spaces, at the rate of 1 space per 25 car parking spaces.

TAN4: Retail and Commercial Development (2016)

5.36 The development plan should include a clear strategy for retail and commercial centres which sets out how the Local Planning Authority wishes to see those areas develop over the plan period.

5.37 The Welsh Government's objectives for retail and commercial centres are to:

- Promote viable urban and rural retail and commercial centres, as the most sustainable locations to live, work, shop, socialise and conduct business.
- Sustain and enhance retail and commercial centres vibrancy, viability and attractiveness.
- Improving access to, and within, retail and commercial centres by all modes of transport, especially walking, cycling and public transport.

TAN12: Design (2016)

5.38 Good design principles are set out in this document for the built and natural environment.

5.39 For employment and commercial areas, the design of employment areas is important, as high quality of design can add value to commercial property, support the image of modern businesses and encourage further investment. Early consideration of the need to embrace high environmental standards, low carbon aspirations and minimise the need for artificially cooled buildings, provide opportunities to develop shared low carbon and renewable energy options.

5.40 Large new employment buildings can often make a bold statement of their purpose. Recognising the functionality of business premises is important to ensure they contribute to the economic success of the occupier. However, robust design, high quality materials, flexibility of exterior and interior layout and appropriate landscape treatment such as earth form or planting, can help to integrate new business premises into their surroundings, minimise the need to artificially cool buildings and allow for easier conversion by successive occupiers. Service and utility features, exposed and imaginatively

detailed, may in many cases provide elements of interest in otherwise plain facades. The need to consider the building and landscape maintenance processes once the development is completed is also essential to ensure that the development remains integrated.

6. Planning Appraisal

6.1 This section of the SPS assesses the proposals against the relevant policies of the adopted Development Plan and is supported by the technical reports accompanying the application. Welsh planning legislation requires all applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

Principle of Development

6.2 The site already benefits from outline and reserved matters permission for a district centre. The original outline permission (ref: 049320) was granted on 7th January 2013 for the redevelopment of a strategic brownfield site for an employment and residential-led mixed-use development with new accesses and associated infrastructure, including flood defences and landscaping. This permission included the provision of retail development as part of a new district centre.

6.3 Following this, reserved matters consent (ref: 064445) was granted on 18th October 2022 at the application site for the construction of a new district centre comprising 12 units (a combined 1,700 sq.m) for uses including food retail (Use Class A1) and food and drink (Use Class A3). The Officer's Report for this reserved matters application found it necessary to condition the use of 11 of the 12 proposed units to 'food and convenience' uses only. This emphasises the importance that the Council places on the delivery of retail provision within the future centre that will serve the day-to-day food shopping needs of the area's growing residential community.

6.4 The extant scheme has not proved deliverable in the current economic climate, with no end users identified. Notwithstanding this, the extant permission remains of relevance as a 'fall-back' position in planning terms, given that it could still theoretically be constructed at some point in the future in the absence of alternative development proposals and involves a comparable overall quantum of A1/A3 floorspace.

6.5 Accordingly, the fallback position should be afforded considerable weight as a material consideration when determining this planning application, and in particular when interpreting local policy tests associated with the principle of development. This is because even if conflict was identified with these policies (or with the Development Plan as a whole) and the current application was refused, a broadly equivalent quantum of retail and food and drink floorspace could still be delivered via the implementation of the extant reserved matters consent (ref: 064445).

6.6 Against this context, the proposed development merely represents a revised retail scheme comprising a more proportionate foodstore, a drive-thru bakery unit in place of a drive-to restaurant, and an EV charging hub. The current proposals are a wholly deliverable development opportunity, with the foodstore and bakery uses having named end users and expected to form a key part of the new district centre. The scheme is eminently deliverable, with Aldi targeting construction of the scheme during early 2025 if planning permission is granted this year.

6.7 Notwithstanding the fallback position, which has established the principle of retail development, the Development Plan also strongly supports the principle of development for a new foodstore (Use Class A1), a drive-thru unit (Use Class A3), associated car parking facilities including an electric vehicle charging hub, pedestrian access routes and servicing, landscaping, and associated site works.

6.8 Policy STR2 and PC1 of the LDP directs new development to locations including allocated sites. Policy STR3A of the LDP allocates the application site as part of a key strategic site, named the Northern Gateway Mixed Use Development Site for employment, housing, commercial and community facilities. The site will make an important contribution to the overall provision for growth in Flintshire over the

Plan period, including a commercial development hub adjacent to the A550 and a District Centre(s) to serve local convenience needs.

- 6.9 The Northern Gateway site will bring forward 1,325 new homes, which has the potential to bring an additional 3,000 to 4,000 new residents to the area. The strategic site is moving forward, with both employment and residential phases being built out and occupied. The delivery of local convenience facilities is therefore crucial in this location, particularly as the provision of a district centre in this location has already been approved to serve the needs of the Northern Gateway site and given its close proximity to the needs of the existing community of Garden City. Indeed, the Conclusion (Section 7) of the Officer Report associated with reserved matters consent Ref. 064445 states exactly this, highlighting that retail development is “welcomed by the LPA” in this particular location in order to serve the food retail needs of a growing residential community and expanding workforce at The Airfields’ employment development plots.
- 6.10 Drawing the above together, the site already benefits from outline and reserved matters approval for a comparably sized district centre and is allocated for a mix of commercial uses, including retail. The proposed uses are at an appropriate scale and nature for this location (given the very significant new residential population proposed) and the proposal therefore complies with Policies STR8, STR9 and PE7 of the LDP.
- 6.11 In addition, the proposal will provide a number of economic benefits including providing a number of jobs via the units, emphasising Deeside and its area of influence as the economic focus for Flintshire’s long term economic ambition in line with Policy STR7 of the LDP. Policy STR8 and PE1 of the LDP further supports employment development at this site allocation.
- 6.12 In summary, the principle of development at this site has been recently established by the consented outline and reserved matters applications for comparable retail development. A fallback position exists given the extant consent and should be afforded considerable weight as a material consideration when determining this planning application. Furthermore, the proposals are wholly consistent with the Development Plan policies and the proposal is evidently of an appropriate scale and nature to provide convenience uses to serve both existing and forthcoming residents (which could amount to 4,000 people), as well as the needs of those employed at The Airfields’ sizable commercial enterprises. The principle of development is therefore considered to be wholly acceptable in line with Policies STR2, STR3A, STR7, STR8, STR9, PC1, PE1 and PE7 of the LDP.

Design, Layout and Landscaping

- 6.13 The built environment and design policies of Flintshire’s LDP (particularly Policies STR4, PC2 and PC3) require that the layout, design, external appearance and operation of proposed developments are of a high quality and establish a number of general principles of good design that new development within the authority area should include. Schemes are also required to take account of the character and appearance of the surrounding area, as well as the use of materials and landscaping, and whether the scheme creates a ‘sense of place’.
- 6.14 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 prepared by THP. In summary, a key objective for the development from the applicant’s perspective (both commercially and in layout terms) is to provide a scheme which responds appropriately to what is a prominent site for those travelling along Welsh Road and to ensue integration and pedestrian connectivity with the existing commercial, residential, and other uses within the surrounding area.

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- 6.15 The proposed site layout is informed by the design parameters of the site, such as the existing site access from the unnamed commercial spine road, the positioning of underground services and direction of principal views into the site. The chosen layout clearly offers the greatest potential for integration across the site and with the surrounding area. The proposed foodstore will be positioned at the southern end of the site. This arrangement enables the foodstore to face east towards Welsh Road, providing both a presence to Penistone Road North and also giving passers-by a view that will take in the unit's active frontages and boundary landscaping – highlighting pedestrian movement and providing visual interest.
- 6.16 With the differing uses on the site, spatial legibility is important to facilitate easy customer navigation. The foodstore, drive-thru and EV hub occupy distinct areas of the site, all clearly visible from the site entrance. Each building has been positioned to provide active frontages from key vantage points.
- 6.17 The scheme has also been designed to facilitate easy pedestrian movement. All accessible parking and P&C bays are positioned in close proximity to unit entrances and key pedestrian routes have been implemented from Welsh Road and across the site.
- 6.18 The proposed Aldi foodstore has been designed to sit well within its context and the scale of the store is minimised through the 'blade roof' which gives the store a single-story appearance. The proposed drive-thru unit has been designed to also be single-storey, providing a development of a similar scale and massing, if not lower, than the existing properties in the vicinity.
- 6.19 The SPGN No.3 sets out landscaping guidelines in relation to commercial and industrial sites. It states that buildings on these developments tend to be large with associated extensive areas of car parking. The external layout together with boundary treatment plays a significant part in the successful design of these sites. This has been considered in this application through the external layout of the scheme.
- 6.20 Although there are limitations on what can be planted along the Welsh Road frontage, due to below ground services, the proposal has aimed to screen the development along the residential spine road. Proposed native species trees and other landscaping is proposed to enhance the existing landscape and provide low maintenance to the area. The hard and soft landscaping within the development boundary will be enhanced by pedestrian routes and native planting, providing interest to the site. With regards to boundary treatments, a 2.4m high close boarded timber fence is proposed along the site's western perimeter, separating the site from the adjacent development plot, this is discussed further in the section below.
- 6.21 Good design principles are set out in TAN12. Appropriate landscaping and boundary treatments have been provided as well as high quality materials on the exterior elevations of the proposed units to help integrate the new business premises into their surroundings. The proposal also provides sustainability measures which are set out in more detail in the Design and Access Statement.
- 6.22 Overall, it has been demonstrated that the proposed site layout offers the greatest potential for place-making and integration of the proposed uses across the site and with the surrounding area. The design of the proposed foodstore will be of a high-quality modern standard and sympathetic to the scale, form and character of existing surrounding structures. The design philosophy adopted, drawing upon a simple palette of contemporary materials, will ensure that the proposed foodstore and drive-through unit do not appear out of place in the context of surrounding land uses. Compliance can therefore be demonstrated with Policies STR4, PC2 and PC3 of the LDP, SPGN No.3 and the design policies of relevance contained in TAN12.

Residential Amenity and Noise

- 6.23 Policy PC2 of the LDP concerns, amongst other things, the impact of development proposals on surrounding residential and local amenity. The proposed development site is located relatively near to residential properties and, immediately west of the site, a new care home (Use Class C2) has been granted permission on 13th March 2024 (ref: FUL/001017/23). Consequently, a Noise Impact Assessment is required to cover the operation of the proposed development and has been prepared by Spectrum Acoustic Consultants.
- 6.24 A background noise measurement survey has been conducted at locations representative of the most sensitive residential positions to the development site and predictions of noise from the cumulative mechanical plant equipment has been completed, utilising a proprietary software package. An assessment of the potential noise impact produced by deliveries to the Aldi store has also been completed.
- 6.25 The NIA recommends boundary specific noise mitigation measures along the site's western boundary in the form of a 2.4m high close boarded timber fence. It also proposes a 4m high close boarded timber barrier to the western side of the foodstore's loading bay. With these measures in place, the conclusions of the NIA can be summarised as follows:
- Noise limits for mechanical plant at the proposed Aldi store have been established, based on measured background noise levels. Predictions have indicated that with the proposed mitigation measures in place, the overall noise levels from these services would comfortably meet noise limit objectives and consequently have a low adverse impact.
 - The precise details of the proposed mechanical services plant at the drive-thru bakery unit has yet to be confirmed. Therefore, noise limits in the form of Rating Levels at the nearest residential properties for the mechanical plant have been established for the sensitive trading and night-time periods, based on measured background noise levels. Providing the overall noise contribution from all of the proposed mechanical plant operating simultaneously does not exceed the specified limits, noise levels from these services would have a low adverse impact.
 - Noise limits for deliveries at the proposed Aldi store between 06:00 and 23:00 have been established, based on measured background noise levels. Predictions have indicated that noise levels from deliveries at the proposed Aldi store would meet noise limit objectives and consequently have a low adverse impact.
 - The precise delivery mechanisms at the drive-thru bakery unit has yet to be determined, though it is expected they would be infrequent, as the unit is small and would not require large vehicles to service it. Background noise levels at the nearby residential properties are relatively high due to the proximity of A494 Welsh Road and other local roads. Therefore, the impact of noise associated with deliveries to the drive-thru bakery unit is expected to be very low.
- 6.26 Overall, with mitigation measures in place, noise associated with the proposed development, from plant, deliveries, and the use of the car park is predicted to have no worse than a 'low impact' at the nearest residential properties and proposed residential care home at all times. The servicing and operational hours sought by the prospective end users are therefore considered to be acceptable in planning terms.
- 6.27 Additionally, in examining noise and amenity impacts, it is also important to recognise the planning history of the site. The principle of retail development at this site has been recently established by the consented outline and reserved matters applications for comparable retail development. A fallback

position exists given the extant consent and should be afforded considerable weight as a material consideration when determining this planning application. We note that the reserved matters application recently consented did not include any additional conditions which attempted to control noise across the district centre from commercial operations.

- 6.28 In summary, evidence suggests that there is no potential for the proposed discount foodstore, drive through unit and EV charging hub to result in any 'significant adverse' impacts upon the amenities of surrounding residential occupiers. This is evidenced from a technical perspective as part of the supporting Noise Impact Assessment prepared by Spectrum. Compliance can therefore be demonstrated with Policy PC2 of the LDP and the relevant requirements of national planning policy.

Transportation, Access and Parking

- 6.29 A Transport and Implementation Strategy ('TIS') has been prepared as part of this planning application. Some of the key conclusions which are relevant to the transportation objectives of Local Development Plan Policies STR5 ('Transport and Accessibility'), PC2 ('General Requirements for Development'), PC5 ('Transport and Accessibility') and PC6 ('Active Travel') of the LDP are set out below.
- 6.30 In terms of the accessibility of the site via various transport means, the TIS explains that it is evident that the development site is accessible to pedestrians, cyclists and users of public transport. It adds that the site is within walking distance of existing public transport connections and is well served by high-standard local walking / cycling connections. It is considered that these features would provide opportunities to encourage staff and visitors to the site to consider alternative sustainable transport modes to the private car.
- 6.31 With regards the effects of the proposed district centre on the wider highway network, the TIS explains that the planning application site is located within the allocated "RAF Sealand South Camp" site and has previously been subject to an approved Reserved Matters Application Ref: 064445 (approved in October 2022). It goes on to highlight that as part of the reserved matters application the highway works conditioned have already been agreed and delivered. There should therefore be no further requirement for off-site highway works in association with a broadly comparable scale of retail development on the site.
- 6.32 The TIS states that whilst the scale of the retail development has marginally increased from the consented use (an increase of 247 sq.m GEA), it is considered that the majority of these trips will be generated by the wider mixed-use scheme during the peak period (i.e. internal site trips between the residential or employment uses and the food store). Likewise, the number of vehicle trips that may access the site to use the EV Charging Hub are not considered to be additional vehicle trips on the local highway network. As with other refuelling stations located on the wider highway network, this site is anticipated to be used by current road users passing the facility as part of a 'linked trip'.
- 6.33 On this basis, the TIS finds that the conclusions reached in Reserved Matters Application Ref. 064445 regarding highways impact remain valid and the development proposals are not anticipated to result in material increases in traffic on the wider highway network. It is concluded that there are no overriding reasons preventing the Local Planning Authority from recognising that the proposal is acceptable with regard to the local highway network. The proposal is therefore in accordance with Policies STR5, PC2, PC5 and PC6 of the LDP.

Flood Risk and Drainage

- 6.34 TAN15 advises that new developments should be directed away from areas at high risk of flooding and towards suitable land in areas of low, or otherwise medium risk. The site is considered to lie within a

“low risk” area, however mitigating measures should be employed to reduce the residual risks from all sources and to ensure that any existing overland flood flow routes are maintained around the proposed building footprint. Mitigation measures include finished floor levels set a minimum of 300mm above existing ground levels to address any residual risk of surface water flooding. Furthermore, external ground levels should also be set to ensure any surface water of overland flooding falls away from the building footprint and towards positive on-site drainage systems.

- 6.35 Regarding drainage, both units have been positioned to avoid the existing drainage infrastructure and their respective easements, with the proposed foodstore building located at the southern end of the site and the proposed drive-thru unit positioned in the north-eastern corner of the site. The proposed drainage scheme will feature permeable parking bays of either concrete block pavements or permeable macadam construction. All other areas are considered to not be suitable for permeable surfaces and so will be traditional macadam or concrete finish. These areas will be drained via trapped gullies and/or linear drainage channels which will convey flows to the proposed pipe network. Flows from the site are proposed to discharge into the adjacent surface water drain at an unrestricted rate.
- 6.36 Foul water flows will discharge into the existing foul water drain located on the sites western and southern boundary. 2no new connections are proposed onto the existing foul water stubs provided on the site boundary. The nature of the effluent will be domestic content with the Foodstore and the drive through having approximately 5no WC's and associated wash hand basins with limited discharge from any kitchen areas. It is anticipated that an un-restricted gravity connection will be possible.
- 6.37 All drainage design and detail will be subject to a SuDS Approval Body (SAB) Application to Flintshire County Council under Welsh Government requirements. The application form for full application approval of SuDS on new developments in accordance with The Sustainable Drainage (Approval and Adoption Procedure) (Wales) Regulations 2018 has been completed and accompanies this application.
- 6.38 Further details of the scheme's acceptability in flood risk and drainage terms is provided in the '*Flood Risk Assessment & Drainage Statement*', prepared by Hydrock. The proposal is considered to comply with the requirements of TAN15 and Policies STR6, PC2 and EN14 of the LDP.

Ecology and Biodiversity

- 6.39 An Ecological Impact Assessment has been prepared by Tyler Grange for the site, who have been involved in the scheme for many years. Previous ecological assessments made by Tyler Grange for enabling works and as part of the Environmental Impact Assessment for the outline application concluded that any effects to statutory and non-statutory designations could be controlled through the adoption of pollution control and bio-security measures, which can be secured through appropriately worded planning conditions pursuant to this current application.
- 6.40 Habitats affected by the development are evaluated as being of negligible importance, the loss of which will require no specific mitigation. Landscape proposals will mitigate any losses through the creation of habitats which strengthen the existing green infrastructure, which has already been constructed around Plot 2A as part of enabling works. Habitats adjacent to the site are to be protected through the adoption of protection measures for tree and water courses to be set out in a Construction Environmental Management Plan.
- 6.41 The scheme is found to have no implications for protected or priority species, albeit mitigation for bird habitat loss can be secured through the adoption of landscape design principles secured through suitably worded planning condition. The report advises that any site clearance during the bird breeding season should be preceded by a check for active nests by a suitably qualified ecologist. It also

recommends an updated badger survey prior to the commencement of development. Both of these further pre-development surveys can be dealt with via planning condition.

- 6.42 Overall, it is concluded in the Ecological Report that provided mitigation measures that are to be detailed in a Construction Environmental Management Plan are implemented in full, together with the implementation of a landscape strategy, there can be confidence that development proposals would be compliant with relevant legislation and local / national planning policy relating to nature conservation.

Land Contamination

- 6.43 A Geo-environmental Ground Investigation report has been conducted by JPG and the findings set out in this submitted report. It is recommended that further ground investigation works are carried out to delineate potential contamination and monitor groundwater levels. This should include trial pitting, window sampling boreholes and chemical analysis of soil and water samples.

Energy and Sustainability

- 6.44 The sustainability performance of the proposed Aldi foodstore and drive-thru bakery unit is considered in detail in the supporting Renewable and Low Carbon Energy Statement prepared by Sol Environment Limited.
- 6.45 The Renewable and Low Carbon Energy Statement demonstrates that the Aldi foodstore will achieve a significant CO₂ emissions reduction when compared with a 2022 Welsh Building Regulations compliant development. The CO₂ emissions reductions are accounted for by the specification of well-insulated and airtight building fabric, high efficiency M&E systems, an Air Source Heat Pump supplemented by a 'Freeheat' Refrigeration Heat Recovery System in the Foodstore, and a roof-mounted 80kWp Solar PV array on the Foodstore. The energy savings accounted for by the renewable technology (PV array & 'Freeheat' system in the Foodstore) are equivalent to 45.4% of the development's energy demand, which meets the 10% minimum reduction outlined in Tan 22.
- 6.46 All space heating requirements will be provided by the ASHP systems, with the Foodstore's system further supplemented by waste heat recovered from the 'Freeheat' refrigeration heat recovery system. The feasibility of using decentralised heat or energy networks has therefore been discounted.
- 6.47 The Renewable and Low Carbon Energy Statement thereby demonstrates that the proposed development will deliver a high-quality energy efficient and sustainable scheme that accords with the national and local planning policies and guidance relating to energy and sustainability matters, most notably Policy STR4 (*Principles of Sustainable Development, Design and Placemaking*), Policy STR14 (*Climate Change and Environmental Protection*), and Policy EN12 (*New Development and Renewable and Low Carbon Energy*) of the LDP. In addition to the Local Plan, Tan 22: Planning for Sustainable Buildings states that at least 10% of the energy supply of the non-residential development shall be secured from decentralised, renewable or low carbon energy sources. The scheme evidently more than achieves this policy objective.

Summary

- 6.48 This section has clearly demonstrated that the application proposals meet the requirements of the relevant policies contained within the adopted Flintshire Local Development Plan relating to: the principle of retail development, transportation and access, design and layout, landscaping, ecology, flood risk and drainage, contamination and pollution, noise impact, and renewable energy, amongst

others. This is as well as according with the relevant, corresponding policies contained within Wales' national planning policy documents and meeting the wider national planning policy objective of delivering sustainable economic growth.

- 6.49 Moreover, it is evident that the principle of the site's re-development for retail-led mixed-use development has previously been established through the granting of outline and reserved matters permissions for comparable 'district centre' development on the site as recently as 2022, which included a comparable quantity of floorspace for main town centre uses. This represents an important material consideration in the application of local planning policy and the determination of the planning application.

7. Summary and Conclusions

Overview

- 7.1 This Supporting Planning Statement has been prepared by Avison Young on behalf of Aldi Stores Limited and submitted to Flintshire County Council (“FCC”) in support of a full planning application for the following development at Plot 2A, The Airfields at South Camp, Welsh Road, Garden City, Deeside, CH5 2RD:

“Full planning application for the erection of a new Aldi foodstore (Use Class A1); a drive-thru unit (Use Class A3); associated car parking facilities including an electric vehicle charging hub; pedestrian access routes and servicing; landscaping; and associated site works (including two electrical substations).”

- 7.1 The site extends to approximately 1.4 hectares and is situated in a prominent location on the B5441, Welsh Road. It is located within an area earmarked by FCC in the adopted Local Development Plan for the provision of a new district centre to serve the growing ‘Garden City’ at The Airfields. The site comprises previously developed land and forms part of a much larger area that already benefits from outline planning permission (ref: 049320) for redevelopment to provide strategic employment and residential-led mixed-use development. This permission also explicitly includes provision of retail development as part of a new district centre.
- 7.2 Furthermore, reserved matters consent (ref: 064445) was granted on 18th October 2022 at the application site for the construction of a new district centre comprising 12 units for uses including food retail (Use Class A1) and food and drink (Use Class A3). The Officer’s Report for this reserved matters application found it necessary to condition the use of 11 of the 12 proposed units to ‘*food and convenience*’ uses only. This emphasises the importance that the Council places on the delivery of retail provision within the future centre that will serve the day-to-day food shopping needs of the area’s growing residential community. The permitted scheme has not proved deliverable and is no longer being progressed, but remains of relevance as a ‘*fall-back*’ position in planning terms given its extant nature.
- 7.3 A revised scheme comprising a discount foodstore (Aldi), drive-thru bakery (Greggs), and an electric vehicle charging hub is now proposed to reflect current market interest in the site and the changing economic context. The significant investment proposed by Aldi, Greggs and the EV charging operator will provide the opportunity to bring a long vacant site back into beneficial economic use, with the discount foodstore and drive-thru forming part of a new district centre which will help serve the day-to-day retail needs of The Airfields community. The proposed electric vehicle charging station will support the transition to electric vehicles and contribute to the UK government’s net-zero emissions target for 2050.
- 7.4 The proposed development will give rise to tangible economic benefits, including the creation of more than 50 full and part-time local jobs as well as various other indirect jobs in construction, supply chain, support, etc. Alongside these economic benefits, the scheme will enhance consumer choice and will provide further much-needed competition within the local food retail sector through the provision of a dedicated, proportionate foodstore for The Airfields community.
- 7.5 Finally, the scheme is eminently deliverable, with Aldi targeting construction of the scheme during early 2025 if planning permission is granted this year. Aldi and Greggs’ very presence is also anticipated to raise the profile of the site, investor confidence, and market interest in The Airfields’ remaining residential and employment development opportunities during a challenging economic period.

Policy Compliance

- 7.6 This Planning and Retail Statement has considered the application proposals against the relevant policies contained within Flintshire's Local Development Plan, as well as other material considerations including national planning policy guidance. Section 6 of this report has demonstrated that the application proposals meet the requirements of the relevant policies contained within the adopted Flintshire Local Development Plan relating to: transportation and access, design and layout, landscaping, ecology, flood risk and drainage, contamination and pollution, noise impact, and renewable energy, amongst others. This is as well as according with the relevant, corresponding policies contained within Wales' national planning policy documents and meeting the wider national planning policy objective of delivering sustainable economic growth.
- 7.7 With regards the principle of retail development on the application site, Section 6 of our report demonstrates that this has recently been established by the consented outline and reserved matters applications for comparable retail development. A fallback position exists given the extant consent and should be afforded considerable weight as a material consideration when determining this planning application. Furthermore, the proposals are wholly consistent with the Development Plan policies and the proposal is evidently of an appropriate scale and nature to provide convenience uses to serve both existing and forthcoming residents (which could amount to 4,000 people), as well as the needs of those employed at The Airfields' sizable commercial enterprises. The principle of retail development is therefore considered to be wholly acceptable.

Scheme Benefits and Planning Balance

- 7.8 National planning policy is clear that development proposals which accord with an up-to-date development plan should be approved 'without delay'. This Planning Statement has demonstrated that the application proposals are compliant with all up-to-date policies contained with the adopted Local Development Plan, and permission should therefore be granted.
- 7.9 Notwithstanding this robust conclusion, the Town And Country Planning Act 1990 (as amended), 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.
- 7.10 Along with the material considerations already identified in this section, our report has identified a number of very positive impacts that the proposed development will give rise to. It is appropriate to weigh these material considerations into the planning balance as part of the determination of the application. The positive impacts can be summarised as follows:
- The proposal offers the guarantee of deliverable economic development within Flintshire by multi-national supermarket brand Aldi, 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 exceed £5m.
 - The scheme will create over 50 quality full and part-time jobs; delivering further indirect jobs through services supporting the new foodstore and drive-thru, and also providing a range of temporary construction jobs. The vast majority of positions will be made available to local people. The creation of substantial new jobs at a range of levels targeted at local people is expected to contribute to an increase in local employment rates.

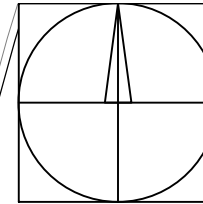
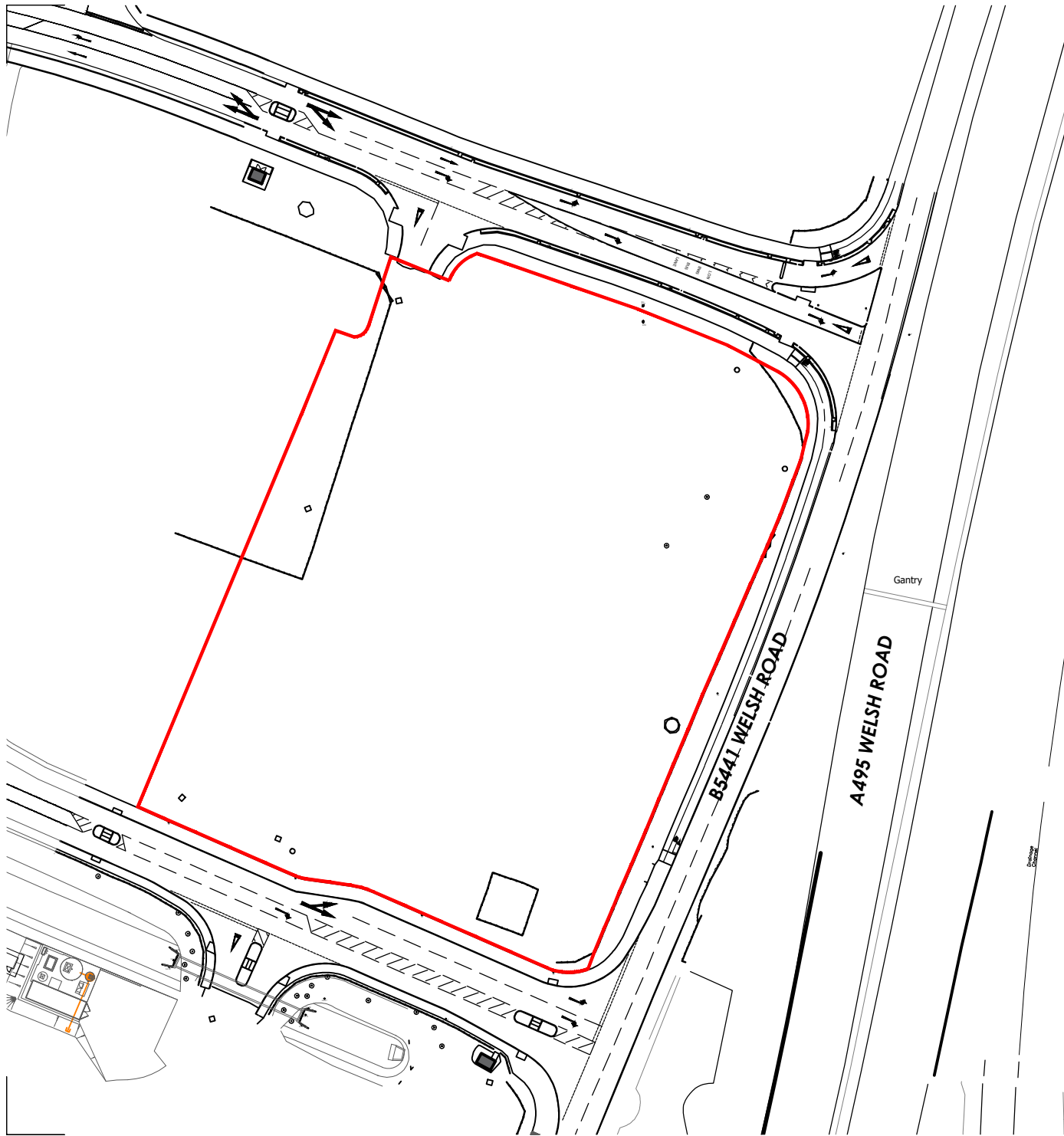
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- This planning application provides the opportunity to secure the comprehensive redevelopment of a development site which has remained largely vacant for many years during what remains a challenging economic period.
 - The proposed mixed-use development will deliver new retail uses in a prominent and accessible 'district centre' location that will reduce the need for current and future Airfields residents to travel to such provision. In this fashion the scheme will reduce car use and result in more sustainable travel patterns.
 - The introduction of an Aldi foodstore will play an important role in further enhancing consumer choice and competition within the local food retailing sector by providing a new discount foodstore in this area of Deeside. The Aldi offer is of particular benefit in this regard, given the 'cost of living crisis' that the UK is presently facing and the fact that Aldi is currently the UK's lowest-priced supermarket.
 - The discount foodstore will take on an important ancillary role serving the surrounding commercial and industrial uses within The Airfields employment allocation, by providing complimentary convenience retail, and food and drink facilities to employees and visitors to the neighbouring industrial uses, helping to create an environment where people want to work.
 - The proposed scheme will offer important sustainability benefits, with the provision of an electric vehicle charging hub supporting the shift to electric vehicles and helping to future proof Flintshire in terms of this emerging mode of private travel. The proposed Aldi store will further include four car parking spaces equipped with Electric Vehicle Charging Points (EVCP). Furthermore, below ground infrastructure will be put in place to add up to a further 20 EVCPs within the Aldi car park in the future.
 - Finally, the proposal will bring about significant environmental and visual improvements to this prominent site on Welsh Road. It will replace what is currently cleared and vacant land with a high-quality, modern, mixed-use development with attractive landscaping to the benefit of the emerging Airfields strategic development site.

7.11 By way of overall conclusion, it is considered that the planning balance in this case is clear-cut. The proposed development accords with the policies of the Development Plan. There would be many substantial benefits to allowing this significant investment, and there are no reasonable grounds for refusing it based on available evidence. The presumption in favour of sustainable development also applies. Accordingly, planning permission should be granted.

Appendix I: Schedule of Supporting Plans and Documents

Plan / Document Title	Reference (Where Applicable)	Author
Site Location Plan	19526-THP-XX-XX-DR-A-0099	The Harris Partnership
Existing Site Plan	19526-THP-XX-XX-DR-A-0100	The Harris Partnership
Proposed Site Plan	19526-THP-XX-XX-DR-A-0101G	The Harris Partnership
Foodstore Proposed GA Plan	19526-THP-XX-XX-DR-A-0103B	The Harris Partnership
Foodstore Proposed Roof Plan	19526-THP-XX-XX-DR-A-0104B	The Harris Partnership
Foodstore Proposed Elevations	19526-THP-XX-XX-DR-A-0105C	The Harris Partnership
Drive-Thru Proposed GA Plan	19526-THP-XX-XX-DR-A-0106	The Harris Partnership
Drive-Thru Proposed Roof Plan	19526-THP-XX-XX-DR-A-0107	The Harris Partnership
Drive-Thru Proposed Elevations	19526-THP-XX-XX-DR-A-0108B	The Harris Partnership
Proposed Boundary Treatments	19526-THP-XX-XX-DR-A-0109D	The Harris Partnership
Proposed Landscape Plan	19526-VEC-XX-XX-DR-L-1001-S2-P04	Vector Landscape Design
Computer Generated Image (Illustrative)	19526 Deeside M_07 CGI_01	Vector Landscape Design
Design and Access Statement	-	The Harris Partnership
Proposed Site Drainage Plan	19526-THP-XX-XX-DR-A-0101A	The Harris Partnership
Indicative Drainage Layout	32405-HYD-XX-XX-SK-C-1000 (P02)	Hydrock
Flood Risk and Drainage Assessment	-	Hydrock
SuDS Application Form	-	Hydrock (on behalf of Aldi Stores Ltd)
Ecological Impact Assessment	-	Tyler Grange
Geo-Environmental Ground Investigation Report	-	JPG
Energy Statement	-	Sol Environmental
Transport Statement and Travel Plan	-	Cameron Rose Associates
Noise Impact Assessment	-	Spectrum Acoustic Consultants
Supporting Planning Statement	-	Avison Young

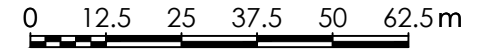
Appendix II: Site Location Plan



NORTH

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Rev	Date	Description	Drawn	Chk'd



SCALE 1:1250

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Architecture
Masterplanning
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Client

ALDI STORES LTD.



Project Title

PROPOSED DEVELOPMENT
THE AIRFIELDS

WELSH ROAD
DEESIDE

Drawing Title

LOCATION PLAN

Drawn	Checked	Scale @A4	BIM Status	Date
MS	MS	1:1250	NA	01/24

Drawing Status	Rev.	THP Project No
PLANNING	-	19526

Project No.	Originator	Volume	Level	Type	Role	Number
19526	THP	XX	XX	DR	A	0099

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