
SUPPORTING PLANNING STATEMENT

REFURBISHMENT, EXTENSION AND EXTERNAL ALTERATIONS TO EXISTING NON-FOOD RETAIL UNIT TO ENABLE IT TO TRADE AS PART FOODSTORE AND PART NON-FOOD RETAIL UNIT, ALONGSIDE MODIFICATIONS TO EXISTING EXTERNAL GARDEN CENTRE, CAR PARKING LAYOUT, LANDSCAPING, AND OTHER ASSOCIATED SITE WORKS

**HOMEBASE, STURLAS WAY, WALTHAM CROSS,
EN8 7BF**

March 2021

Contents

1.	Introduction	1
2.	Site Description	3
3.	Proposed Development.....	7
4.	Aldi Stores Ltd	16
5.	Planning Policy Context	23
6.	Planning Policy Appraisal.....	36
7.	Conclusion and Planning Balance	47

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For and on behalf of GVA Grimley Limited t/a Avison Young

1. Introduction

- 1.1 This Supporting Planning Statement has been prepared and submitted by Avison Young ('AY') on behalf of Aldi Stores Limited ('Aldi'). It forms part of a suite of documents in support of an application which seeks 'full' planning permission for the refurbishment, extension and external alterations to an existing 'Use Class E' non-food retail unit currently occupied by Homebase, to enable it to trade as part foodstore (Aldi) and part non-food retail unit (Homebase). Alongside works to the building itself, the scheme involves modifications to an existing external 'garden centre' (outdoor sales area), the current car parking layout, and other associated site works. The proposals are located at the existing Homebase unit on Sturlas Way, Waltham Cross, EN8 7BF (hereafter referred to as 'the application site').
- 1.2 The objective of the development proposals is to modify, refurbish and extend the existing non-food retail unit on Sturlas Way in order to enable joint occupation by both Aldi and Homebase. This will enable Aldi to make a positive investment within Waltham Cross town centre – a centre in which they have been seeking representation for many years – whilst retaining the home improvement retail offer of Homebase and the existing benefits this brings to the area. The reduced size of Homebase's unit will be more commensurate with their future business requirements and will safeguard the viability of their operation, with the retailer having been through a process of 'right-sizing' its portfolio over the past two years.
- 1.3 Given its town centre location, the site is both sustainably and accessibly located to the surrounding residential areas that it will serve. The introduction of Aldi at the northern end of the high street will provide an important 'in-centre' convenience retail anchor for Waltham Cross town centre, which will help drive footfall and spin-off trade for existing local businesses, thereby enhancing the centre's overall 'vitality and viability' during what remains a challenging period for the retail sector.
- 1.4 The Aldi store will also create 40-50 quality full and part-time local jobs; delivering further indirect jobs through services supporting the new facility, and also providing a range of temporary construction jobs. This is in addition to the retention of existing local jobs at the Homebase store, which will otherwise likely be lost in time if the retailer is unable to sustainably downsize their current operation.
- 1.5 Alongside these retail choice, spin-off trade and job creation benefits, the scheme will offer the opportunity to notably improve the visual appearance of the site. This will be through the remodelling of the building itself, which will see extensive new glazing introduced to its northern elevation. The scheme will also be carefully landscaped and in particular the proposals introduce new native shrub planting to the site's Sturlas Way boundary and a new pocket of landscaping at the site's north-western corner.
- 1.6 Discussions between the applicant and planning officers at Borough of Broxbourne Council ('Broxbourne') regarding works to the Homebase unit have taken place in advance of the planning application's submission via a pre-application meeting (March 2020). The proposals were received favourably at this meeting and the comments provided verbally have informed the submitted plans and supporting information.
- 1.7 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, 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. In addition, the report also seeks to demonstrate the wider social, environmental and economic benefits of the scheme.

1.8 The application is accompanied by detailed layout, floorplans and elevational drawings prepared by The Harris Partnership. This Planning Statement should be read in conjunction with the following documents submitted with the application:

- Design and Access Statement prepared by The Harris Partnership;
- Landscaping Scheme prepared by Vector Landscape Designs;
- Transport Assessment (and Travel Plan) prepared by Connect Consultants;
- Land Contamination, Phase 1 Environmental Site Assessment prepared by Webb Yates;
- Flood Risk and Drainage Assessment prepared by Webb Yates;
- Drainage Assessment Layout Plan (Ref. B1299-S-101.P1) prepared by Webb Yates;
- Ecological Appraisal prepared by Tyler Grange;
- Arboricultural Impact Assessment prepared by Tyler Grange; and a,
- Noise Impact Assessment prepared by Noise Solutions Limited.

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 application proposals;
- **Section 4** – Offers an overview of Aldi and outlines some of the key benefits that the business hopes to bring to Waltham Cross;
- **Section 5** – Contains an overview of relevant local and national planning policies;
- **Section 6** – Provides evidence of the proposal's compliance with relevant planning policies contained within the Development Plan and national planning policy; and,
- **Section 7** – Evaluates the development proposals against the policy balance set out under Paragraph 11 of the National Planning Policy Framework and provides our overall conclusions.

2. Site Description

2.1 This section describes the site's location, its surroundings and the specific characteristics of the site itself.

Site Location

2.2 The application site extends to approximately 1.2ha and comprises an established retail premises, currently occupied by Homebase on Sturlas Way, with associated car parking and temporary hand car wash. The site is located within the administrative boundary of 'Borough of Broxbourne Council' and is within the ward of Waltham Cross.

2.3 The site lies in the heart of Waltham Cross. It is within the northern boundary of the defined 'town centre' (as identified on the policies map which supports the Borough of Broxbourne Local Plan, June 2020) and must therefore be classified as an 'in-centre' location in town centre policy terms. The site is in close proximity to a wide range of existing retail, leisure and commercial uses – reflecting its town centre location.

Site Description and Features

2.4 The application site is broadly rectangular in shape and extends to approximately 1.23ha in size. Vehicular access / egress is currently taken from the south-eastern boundary of the site from a junction with Sturlas Way. Sturlas Way links directly to the A121 (Winston Churchill Way / Monarchs Way) immediately north of the site and also to Park Lane to the south of the site, which provides a direct vehicular and pedestrian linkage to the other shops and services of Waltham Cross town centre.

2.5 The site as existing contains a square shaped, large-format non-food retail unit which is occupied by Homebase – a national-multiple home improvement retailer. This building occupies a central position within the site and backs onto the southern boundary, facing east. Car parking wraps around the building to the north and east (providing some 192 spaces in total), whilst to the west is an enclosed, part covered / part open-air 'garden centre' – for plants and outdoor goods sales. Also on the western boundary (south-western corner of the site) is the retail unit's servicing area, which is accessed via a servicing road immediately south of the building and adjacent to the southern boundary.

2.6 The building itself, which is two storeys in height, extends to 3,435 sq. m Gross Internal Area ('GIA') at ground floor level, with a mezzanine floor of 884 sq. m (i.e. 4,319 sq. m total). It is understood that the net sales area of the building is 2,565 sq. m at ground floor level and 739 sq. m at mezzanine level (i.e. 3,304 sq. m total). The unit's associated, open, outdoor garden centre sales area extends to approximately 1,398 sq. m. Finally, retail unit currently has a projecting single-storey lobby on its eastern elevation which extends to 73 sq. m GIA.

2.7 The building is of steel frame construction with a mixture of external finishes, including brick and high level profiled cladding. On the eastern and northern elevation of the building, the high level cladding is cloaked with a net banner. As a retail unit the building looks relatively dated by modern standards and is in need of investment. The northern elevation in particular appears relatively blank, despite its prominence from the A121 to the north-east of the site.

- 2.8 In relation to boundary treatments and landscaping, the site benefits from a landscaping strip along its eastern boundary with Sturlas Way. This includes a number of small trees and one larger one at the north-eastern corner of the site. The Arboricultural Impact Assessment ('AIA') submitted as part of this application states that this north-eastern tree (Tree T1) merits removal in view of the fact that it is leaning noticeably and is unsafe. The tree's root system has also damaged the pedestrian highway to the north-east of the site and has cracked a boundary wall. The other key landscape feature of the existing scheme is a line of well-established coniferous trees along the site's southern boundary. This screens the rear of the building and its servicing yard from the residential properties to the south.
- 2.9 In summary, the application site is rectangular in shape, extends to approximately 1.23ha, is flat and level, and contains a large-format non-food retail unit occupied by Homebase. It is evident that the building's refurbishment and extension to introduce a second retailer (Aldi) has the potential to bring about economic, environmental and visual improvements by enhancing what is currently a tired structure, that is in need of investment. The works proposed will improve the visual appearance of this prominent site on one of Waltham Cross' key vehicular routes, to the overall benefit of the surrounding area.

Site Surroundings

- 2.10 In terms of the site's surroundings, to the north is the A121 dual-carriageway (Winston Churchill Way), beyond which is a public house (The Vine) and an established residential area. To the west of the site is another densely populated residential area comprising terraced and semi-detached two-storey dwellings, this includes Leven Drive and Leven Close.
- 2.11 To the east and south of the site, on the opposite side of Sturlas Way, is the wider town centre of Waltham Cross. Immediately east is a three-storey apartment block with office uses at ground floor level. South of this use (south-east of the site) is a Wickes home improvement store and its associated car parking. Further south again (less than 100m from the site) commences Waltham Cross' high-street, a pedestrianised street which extends some 500m south and is flanked on both sides by retail, leisure and service uses.
- 2.12 The town centre contains over 150 unit shops and some 39,000 sq. m of floorspace (source: Experian GOAD, November 2020). This includes a number of prominent national multiple retailers including Argos, Boots, W H Smith, New Look, Superdrug and Vodafone. Many of these retailers are housed within the centre's covered shopping mall – The Pavilions Centre. The town centre also benefits from two existing foodstores in the form of Lidl at the very southern end of the centre and a Sainsbury's supermarket contained within the Pavilions Centre. Waltham Cross appears to be a popular and well used town centre, with Experian GOAD data from November 2020 finding that has a vacancy rate of just 7.6% compared to a national average of 13.4%.
- 2.13 In summary, the site and its surroundings can be characterised as being either residential or retail in terms of form and function. The site forms part of Waltham Cross town centre and its wider retail and leisure offer is directly accessible from the planning application site to the south. The retail unit's surroundings represent an important context when considering this site's overall character and setting, and the visual effects of any changes in the future.

Site Accessibility

- 2.14 Direct vehicular access to the application site will be provided by Sturlas Way on the eastern boundary, with this road linking to the A212 immediately north of the site. The A212 (Winston Churchill Way) is an arterial vehicular route into Waltham Cross from the east / west and a road which ultimately connects the settlement to the M25 to the south. Overall, the site clearly has a prominent location in relation to the local road network from which it is readily accessible.
- 2.15 The site is accessible to pedestrians, cyclists and users of public transport by existing infrastructure. The nearest bus stops are 120m to the north of the site on High Street and provide services to Hertford and Cheshunt in the north, Waltham Abbey in the East, Waltham Cross further south and Potters Bar to the east. The site is located 350m (a few minutes' walk) south of Theobalds Grove Train Station, which provides a direct regular service to Cheshunt and central London. It is also 700m north-west of Waltham Cross train station, which provides a direct regular service to central London, Hertford, Bishops Stortford and Stratford.
- 2.16 The application site is accessible to pedestrians by existing footpaths and the wider town centre (which is largely pedestrianised) is located immediately south-east of the site. In light of the local pedestrian facilities present, the site is evidently well connected to the local pedestrian network with opportunities for customers to make trips by foot. There are also opportunities for future staff members to walk to work.
- 2.17 It should be noted that the application site is also accessible by bicycle. Given that the roads local to the site are urban in character, cycling provides the opportunity to access the future Aldi foodstore by a sustainable mode of transport. Cycle parking for both staff and customers will be provided in accordance with the prevailing guidance and will be included within the development, as highlighted in the supporting Transport Assessment prepared by Connect Consultants.
- 2.18 In summary, the application site is highly accessible by private car and other motorised vehicles (such as heavy goods vehicles). This is to be expected given that the primary function of the proposed foodstore is to cater for 'bulk' food shopping needs. This typically involves customers leaving the foodstore with several heavy bags full of goods and, as such, ready access to a private vehicle is often required. Notwithstanding this, it has also been demonstrated that the land is readily accessible by public transport, bicycle and on foot from the surrounding area. This will cater, amongst other things, for those undertaking smaller top-up shopping trips and also for many of the foodstore's locally based staff. Given its town centre location and evidently accessible nature, the application site represents a suitable and sustainable redevelopment opportunity for the scale and form of foodstore development proposed, in accordance with planning policy.

Planning History

- 2.19 A desktop planning history search of the application site has been undertaken which revealed the following relevant planning permissions associated with the site:
- Planning permission reference: 07/14/0265/AC sought permission for the re-branding of the store with internally illuminated fascia signs, non-illuminated pole signs, totem sign and window vinyl signs. Planning permission was granted in May 2014.

- Planning permission reference: 07/09/0669/F sought permission for the continued use of land within the site as a car wash without compliance with Condition 1 of planning permission 7/1017/07/F/WX dated 28.12.07. Planning permission was granted in November 2009.
- Planning permission reference: 7/1017/07/F/WX sought planning permission for a hand car wash and valeting services in the car park of the site, which was approved in December 2007.
- Planning permission reference: 7/0757/05/F/WX applied to vary Condition 18 of planning permission (ref. 7/0383-84) to allow the sale of all non-food items (A1). Planning permission was granted in December 2005.
- Planning permission reference: 7/0717/02/F/WX sought planning permission for a rear conservatory and replacement side canopy. Planning permission was granted in September 2002.
- Planning permission reference: 7/411/2001 sought planning permission for a side extension to the garden centre with additional doors. Planning permission was granted in September 2001.
- Planning permission reference: 7/148/1995 sought planning permission for the demolition of the garden centre wall and construction of new wall and resurfacing of car park. Planning permission was granted in April 1995.
- Planning permission reference: 7/383-84 sought planning permission for the erection of a single storey retail store with open air garden centre and ancillary car parking. Planning permission was granted in May 1984. This is the original planning permission at the site and Condition 18 states

2.20 Based on the above planning history search, it can be concluded that planning permission was granted for the site's existing non-food retail unit on 22nd May 1984, under planning permission reference 7/383-84. This permission was subject to 23 planning conditions and of particular relevance to the current scheme proposals for the refurbishment and extension of the building is Condition 18. This stated that the premises:

- *"Shall be used for the storage, wholesale and retail of articles for home decoration, maintenance and improvement, garden goods and equipment, self-assembly furniture and for no other purpose including any other purpose in Class I of the schedule to the Town & Country Planning (Use Classes) Order 1972."*

2.21 Planning permission reference 7/383-84 was also subject to a Section 52 Agreement (Ref. SA049) dated 31st January 1984 which was made between the Council of the Borough of Broxbourne (1) and Investors in Industry Developments Limited (formerly I.C.F.C. Developments Limited) (2). This legal agreement prevented the Estate being used for *"the purposes of a retail or wholesale food shop or store"*.

2.22 It is however noted that on 28th October 2005 planning permission was granted for the variation of Condition 18 of original permission reference 7/0383-84. This allowed for the sale of all non-food items from the premises, rather than these being limited solely to home improvement products. The current position in relation to trading restrictions at the unit is therefore that it is permitted to stock any non-food goods but is not permitted to stock food goods. This is enforced by both a planning condition and a Section 52 legal agreement, which remains in place on the estate.

3. Proposed Development

- 3.1 This section provides an overview of the proposed development's business format, layout, design, access and servicing arrangements.
- 3.2 The planning application seeks 'full' permission for the refurbishment, extension and external alterations to an existing 'Use Class E' non-food retail unit currently occupied by Homebase, to enable it to trade as part foodstore (Aldi) and part non-food retail unit (Homebase). Alongside works to the building itself, the scheme involves modifications to an existing external 'garden centre' (outdoor sales area), the current car parking layout, and other associated site works. The proposals are located at the existing Homebase unit on Sturlas Way, Waltham Cross, EN8 7BF.

Pre-Application Engagement

- 3.3 Discussions between the applicant and planning officers at Borough of Broxbourne regarding works to the Homebase unit have taken place in advance of the planning application's submission via a pre-application meeting (March 2020). The proposals were received favourably at this meeting and the comments provided verbally have informed the submitted plans and supporting information. It can therefore be seen that through pre-application discussions with the Council, the application proposals represent the output of a collaborative process undertaken in-line with best practice guidance.

Specifics of the Development Proposals

- 3.4 The precise nature of the development proposals is set out below and are presented on supporting Proposed Layout Plan (Ref. 2924-COR-111A). The planning application seeks 'detailed' planning permission for the following:
- Demolition of the existing projecting customer entrance lobby on the eastern side of the building (73 sq. m of floorspace), alongside demolition of part of the enclosed 'garden centre' which currently projects north from the building;
 - External alterations to the elevations of the existing non-food retail unit (including the creation of two shop fronts on the northern elevation) in order to form two adjoining retail units¹;
 - The use of part of the existing floorspace (eastern half of the building) as a foodstore to be occupied by Aldi stores Ltd. This unit will have a total Gross Internal Area ('GIA') of 1,756 sq. m, of which 1,262 sq. m will be used as its net sales area. The 'back of house' area will occupy the remaining 494 sq. m of the building;
 - Aldi's introduction will involve the construction of a new loading dock extension (a dock-levelling system) to the building's eastern elevation, extending to 90 sq. m (this will form part of the back-of-house area);

¹ Note: There are no existing planning restrictions on the internal sub-division of this non-food retail unit.

- The use of part of the remaining floorspace (western half of the building) as a non-food retail unit to be occupied by Homebase. This unit will have a total Gross Internal Area ('GIA') of 2,371 sq. m, of which 1,735 sq. m will be at ground floor level and the remaining 636 sq. m will be at mezzanine level. This non-food unit's net sales area will total 1,514 sq. m (over both the ground and mezzanine floors);
- The Homebase unit will continue to be served by an enclosed open-air 'garden centre' (outdoor sales area). However, this will be reduced in size compared to the garden centre currently present on site;
- Provision of 157 shared car parking spaces between the two units, including 8 accessible spaces, 8 parent and child spaces, and 4 click and collect spaces;
- Provision of 5 motorcycle parking spaces;
- Of the 157 proposed parking spaces, 4 will also be equipped with Electric Vehicle Charging Points ('EVCP') and below ground infrastructure will be put in place to add up to a further 16 EVCPs in the future;
- 18 short-stay bicycle parking spaces (9 Sheffield cycle hoops) for customers, and long-stay bicycle parking spaces (located within the store's warehouse) for staff; and,
- Soft and hard landscaping works across the site, including new landscaping to improve the aesthetic appearance of the site along its eastern and western boundaries in particular. In accordance with advice contained within the Arboricultural Impact Assessment ('AIA'), it is proposed that the existing tree at the north-eastern corner of the site (Tree T1) is removed on safety grounds and compensated for elsewhere in the site.

3.5 The below section describes in detail the various components of the development proposals.

Overview of Aldi Discount Foodstore Format / Business Model

- 3.6 In terms of format, the proposed Aldi foodstore will have a Gross Internal Area ('GIA') of 1,756sq.m and a net trading area of 1,262sq.m. The trading floorspace within every Aldi store is consistent at around 1,200sqm to 1,400sqm. This is to enable the range of identical products sold within each Aldi store to be arranged and displayed on a consistent basis. The gross floor area of new Aldi stores (i.e. the trading floorspace plus back of house area) varies slightly within a range of approximately 1,700sqm to 2,000sqm. Again, the aim is to ensure that the stores are built to a consistent specification in order to facilitate efficient delivery and distribution of products to each Aldi store in the portfolio.
- 3.7 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.
- 3.8 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.

- 3.9 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.
- 3.10 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.

Homebase

- 3.11 The current Homebase unit extends to 4,319 sq. m (GIA) across its ground and mezzanine floors, it is understood to have a net sales area of 3,304 sq. m. The proposed Homebase unit will have a total GIA of 2,371 sq. m, and a net sales area of 1,514 sq. m (across ground and mezzanine levels). Accordingly, there will be a reduction in the Homebase unit's net sales area of over 50% as part of the proposed scheme.
- 3.12 The reduction in the unit's size will allow Homebase to utilise their floorspace more efficiently, better addressing the changing retail needs of customers within the Waltham Cross area. Notwithstanding this, the store will still continue to sell a similar range of home improvement focussed products, including paint and decorating equipment, kitchens and bathrooms, garden and outdoor products, lighting and electrical, furniture and home storage, and other products associated with the DIY retail market.

Layout

- 3.13 In terms of layout, as the submitted Proposed Site Plan (Ref. 2924-COR-111A) illustrates, the site's existing building remains in its current, centralised location albeit the customer entrances will be relocated from the eastern elevation to the northern elevation. The Aldi foodstore will be accommodated within the eastern half of the existing building and Homebase will occupy the western half (both orientated north).
- 3.14 The arrangement of internal vehicular routes and customer car parking will remain comparable to the existing position, this involves vehicular access remaining at the south-eastern corner of the site and car parking occupying the northern and eastern parts of the site. The reduction in the site's car parking capacity from the current position can be attributed to the fact that the bank adjacent to the building's eastern elevation will be lost to the Aldi store's new servicing dock. This represents the main change in car parking layout.

- 3.15 The accessible parking spaces (8) as well as the parent and child spaces (8) will be located immediately north of the new customer entrances on the northern elevation of the proposed retail units. The location of these specialist spaces will offer straightforward access to the foodstore / Homebase entrance as well as Sturlas Way.
- 3.16 The Proposed Layout Plan shows that there will be a dedicated pedestrian footway from the store entrances east across the car park to Sturlas Way, via new connections onto the pedestrian highway. Sturlas Way provides a direct pedestrian link into the wider town centre to the south. Establishing this 'desire line' from the entrance of the foodstore and Homebase towards the town centre just a short distance south will maximise the potential for linked shopping trips to take place.
- 3.17 The Aldi store's servicing area will be positioned at the foodstore building's south-eastern corner (south-eastern corner of the site), ensuring that it does not detract from any key views into the site from Winston Churchill Way (A121) . The position selected also provides a good separation distance (circa 180m) from the elevations of the closest residential property to the south on Ruthven Road. The foodstore's plant compound will also be positioned at the south-eastern corner of the site, on top of the servicing dock, the rationale again being to maximise the distance between this necessary supporting machinery and the closest sensitivity receptors.
- 3.18 The Homebase unit's servicing arrangements will remain as existing. The servicing yard will continue to be positioned on the site's western boundary (south-western corner of the site). It will be accessed via a servicing road immediately south of the building and adjacent to the southern boundary.
- 3.19 The re-orientation of the foodstore and Homebase units within the existing building such that they sit north to south (as opposed to east to west) is favoured by the retailers and from a wider layout perspective as it enables the respective customer entrances to provide a strong presence and frontage to Winston Churchill Way. This is particularly important given the site's gateway location into the town centre from the north. Finally, the orientation ensures that the scheme's servicing area is largely screened from view at the back of the site, as opposed to being visible to passers-by.
- 3.20 In summary, the proposed layout clearly offers the greatest potential for integration with the wider retail uses of Waltham Cross town centre, given that straightforward pedestrian access to Sturlas Way will be achieved and a clear desire line will be established from the foodstore's entrance south towards the wider town centre's offer (via new access points onto the pedestrian highway on the eastern boundary). A key objective of 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 into Waltham Cross town centre from the north via the A121. Re-orientating the customer entrances to the northern elevation of the existing unit offers the potential to provide both a presence to Winston Churchill Way and will also give passers-by a view that will take in the unit's active frontages and boundary landscaping – highlighting pedestrian movement and providing visual interest. This is considered to be a vast improvement on the current site layout.

Design

- 3.21 In terms of their design, the proposed external alterations to the existing building (to create two separate units), promotes a clean, contemporary approach. In particular, the design changes will involve utilising extensive

glazing on the unit's northern elevation. Here, the building will benefit from two feature projecting glazed customer entrance façades.

- 3.22 The extensive use of glazing on the foodstore's most prominent northern elevation will offer views into the sales areas for passers-by along Winston Churchill Way and Sturlas Way, adding interest to this elevation and creating an inviting, active frontage to the scheme. The use of glazing will also provide an expansive customer entrance and allow natural light to permeate throughout the foodstore, thus reducing lighting requirements and creating a more pleasurable shopping experience.
- 3.23 Alongside the extensive new glazing to the northern elevation, the application seeks to modernise and refresh the primary public facing elevations of the building in other ways. For example, the existing brick panels between the brick piers on the east and north facing elevations will be covered with new white render finish (brick piers will be cleaned). This will give the building a more contemporary feel.
- 3.24 In addition, the existing high level parapet cladding will be re-decorated in a single colour (anthracite) and a new solid canopy (anthracite) will be provided over new customer trolley areas. Meanwhile, a new paladin fence (anthracite) will be provided separating the reduced outdoor 'garden centre' from the car park. The proposed loading pod extension will be clad using flat composite cladding panels finished in metallic silver.
- 3.25 With regards scale and massing, the proposed retail units would remain of the same height as the existing Homebase store. This building height is already accepted and integrated into the area. Further, the units will remain lower in height than many surrounding commercial and residential buildings – such as the four storey residential apartment block on the opposite side of Sturlas Way. Accordingly, it is clear that the scale and massing of the proposed retail units will be appropriate for their context.
- 3.26 Whilst it is evident that considerable articulation is proposed on the northern elevation, the nature of the retail units and their operation in terms of use means that the rear elevation (south) is relatively blank in appearance. However, the building has been carefully positioned such that the rear elevation is not in public view.
- 3.27 In summary, the proposed refurbishment, extension and external alterations to the existing non-food retail unit (to create two retail units), will be of a contemporary design with a strong horizontal emphasis and will be constructed using modern methods and materials. The works will modernise and refresh the primary public facing elevations of the units in particular, giving the building a far more contemporary feel than at present.
- 3.28 The design philosophy adopted, drawing upon a simple palate of quality materials, will ensure that the proposed development does not appear out of place in the context of surrounding land uses – in particular the other retail uses of the town centre. A comprehensive overview of the foodstore's design rationale is set out in detail in the accompanying Design and Access Statement.

Landscaping

- 3.29 In relation to boundary treatments and landscaping, the site currently benefits from an existing landscape strip along its eastern boundary with Sturlas Way. This includes a number of small trees and one larger one at the north-eastern corner of the site. The Arboricultural Impact Assessment ('AIA') submitted as part of this application states that this north-eastern tree (Tree T1) merits removal in view of the fact that it is leaning

noticeably and is unsafe. The tree's route system has also damaged the pedestrian highway to the north-east of the site and has cracked a boundary wall. The other key landscape feature of the existing scheme is a line of well-established coniferous trees along the site's southern boundary. This screens the rear of the building and its servicing yard from the residential properties to the south.

3.30 In terms of the landscaping works proposed, as the submitted Proposed Landscaping Plan shows, low-level screen planting is proposed to be replaced / enhanced along the eastern boundary. This will seek to soften the edge of the site from Sturlas Way by providing a mixed species native hedge. In addition, a new specimen tree (a Silver Birch) and shrub planting is proposed at the north-western corner of the site, in order to help frame views into the site from both Sturlas Way and Winston Churchill Way. This new tree will be provided in compensation for the loss of tree T1 at the north-eastern corner of the site, which will be removed owing to its currently unsafe nature (subject to agreement with the local highways authority). Finally, it is proposed that the well-established coniferous trees along the site's southern boundary will be retained, in order to screen views into the site from the south.

3.31 A plan illustrating the proposed landscaping scheme in greater detail is provided as part of the application submission (Ref. 2924-VL-L0) and the key design principles that the landscaping scheme will adhere to are detailed within the accompanying Design and Access Statement. As part of the design solution, particular emphasis has been given to the site's eastern boundary, to ensure that new / replacement vegetation is introduced in order to filter views of the site from both Sturlas Way and Winston Churchill Way. The provision of new planting on the western boundary of the site (including a new tree) will also ensure that it benefits from an attractive, green backdrop.

Vehicular Access Arrangements

3.32 As the Proposed Site Layout Plan shows, the proposed food and non-food retail units will be accessed via the same, existing vehicular junction with Sturlas Way. The site's vehicular access arrangements are presented in detail in the supporting Transport Assessment prepared by Connect Consultants. See specifically Drawing Ref. 19094 – 010 Proposed Highways Works, which is provided at Appendix 3 of their report. The report includes a 'tracking' drawing, which demonstrates that heavy goods vehicles servicing the new Aldi foodstore can enter and leave the site safely in forward gear.

Car & Cycle Parking

3.33 The proposed car park will provide a total of 157 shared car parking spaces which will be dedicated to those wishing to use the Aldi and Homebase stores, although there will also be scope for usage by those wishing to use surrounding facilities in Waltham Cross town centre as part of a linked shopping trip. Aldi and Homebase can confirm that the level of car parking proposed is entirely adequate for their commercial operation / requirements, based upon their wider store portfolios. This matter is examined in greater detail in the accompanying Transport Assessment prepared by Connect transport consultants.

3.34 It is envisaged that a 90-minute time limit will be placed upon the car park's usage, to enable linked trips to take place whilst preventing long-term abuse. This matter will be subject to further discussions with the Local Planning Authority following the application's submission should this be necessary.

- 3.35 As part of the total number of car parking spaces proposed, 8 accessible spaces for disabled customers and 8 spaces for parents with children will be provided. Importantly, the car park will also include 4 spaces that are equipped with Electric Vehicle Charging Points ('EVCP'), an important sustainability feature of the scheme. Furthermore, below ground infrastructure will be put in place to add up to a further 16 EVCPs in the future, future proofing the Aldi and Homebase stores in terms of this emerging mode of private travel.
- 3.36 The site will include 18 short-stay cycle spaces (9 Sheffield cycle hoops) located in front of the northern elevation of the foodstore (and shared also with Homebase). These spaces will have good visibility from both inside the foodstore and from those passing along Sturlas Way. Long-stay cycle spaces will be provided in both the Aldi and Homebase warehouses for staff, whilst showers, lockers and changing facilities will also be incorporated into the units.

Servicing

- 3.37 Servicing access will be taken from Sturlas Way, utilising the same vehicular access junction as provided for customer traffic. The Homebase unit's servicing arrangements will remain as existing. The servicing yard will continue to be positioned on the site's western boundary (south-western corner of the site). It will be accessed via a servicing road immediately south of the building and adjacent to the southern boundary. It is also understood that Homebase's servicing frequency and duration will remain as it currently does and therefore requires no further justification as part of this Planning Statement.
- 3.38 The Aldi store's servicing area (or 'dock') will be positioned at the foodstore building's south-eastern corner (south-eastern corner of the site), ensuring that it does not detract from any key views into the site from Winston Churchill Way (A121). The position selected also provides a good separation distance (circa 180m) from the elevations of the closest residential property to the south on Ruthven Road.
- 3.39 Aldi's servicing dock 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 foodstore's with a traditional 'service yard' arrangement.
- 3.40 In terms of the servicing procedure itself at the planned Aldi store, 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 southern part of the Aldi foodstore.
- 3.41 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.

- 3.42 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 accompanying Transport Assessment (prepared by Connect Consultants) showing this entering and leaving the site safely and in forward gear.
- 3.43 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 Holidays². Accordingly, the applicant is seeking to negotiate through an appropriately worded planning condition minimum servicing hours at the discount foodstore of:
- 06:30 hours to 23:00 hours – Mondays to Saturdays
 - 08:00 hours to 17:00 hours – Sundays
- 3.44 These hours of servicing have been justified as appropriate in noise impact terms as part of the accompanying Noise Impact Assessment, prepared by Noise Solutions Ltd.

Hours of Operation

- 3.45 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 22:00 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.)
- 3.46 Homebase does not envisage any changes to their current hours of operation. Furthermore, it is noted that there are no restrictions currently in place on operational hours based on the building's original planning permission (application reference. 7/383-84, as amended by variation of condition application reference 7/0383-84). Accordingly, it would be considered appropriate to limit Homebase's future hours of operation such that these are reflective of those proposed by Aldi.

² 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.

Summary

- 3.47 In summary, the proposed refurbishment, extension and external alterations to the existing non-food retail unit (to create two retail units), will promote a contemporary design with a strong horizontal emphasis and will be constructed using modern methods and materials. The works will modernise and refresh the primary public facing elevations in particular, giving the building a far more contemporary feel than at present, and will also be to the benefit of the local and wider environment. Full details regarding the design of the Aldi and Homebase units (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.

4. Aldi Stores Ltd

About 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 875 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 4.1 - 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;
- 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.

- 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 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 and Management	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.
	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.
Site Management		External lighting will be compliant to best practice guidelines from the Institute of Lighting.
		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 provides a review of relevant planning policy and guidance at the national and local level in so far as it is material in assessing the merits of the site for the proposed development.

Introduction

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that decisions should be made in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the purposes of this planning application comprise;

- Broxbourne Local Plan 2018 – 2033, adopted 23rd June 2020

5.3 Accordingly, the '*starting point*' in the determination of planning applications within the Broxbourne area is the Local Plan. The site is located within Waltham Cross' Town Centre boundary and the site is also allocated as a mixed-use site allocation. The relevant policies are summarised in this section of the report.

5.4 Alongside the Local Plan (the development plan), there are other local and national planning policy documents that represent material considerations in the determination of this planning application and these are also summarised (where relevant) in this section of our Planning Statement. These policy documents include:

- **National Planning Policy Framework** (February 2019) – The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. The policies contained within the NPPF are important material considerations which should be taken into account when dealing with individual planning applications.
- **Broxbourne Retail & Leisure Study (July 2015) and accompanying Addendum (June 2016)** – WYG prepared the Broxbourne Retail & Leisure Study ('BRLS') in July 2015 and a subsequent addendum in 2016. The purpose of the Study is to provide an assessment of retail and leisure needs and capacity in the period to 2030, and to review the current performance of Waltham Cross and Hoddesdon Town Centres, Cheshunt District Centre, and various neighbourhood centres and local centres within the borough. The Study acted as the evidence base to inform the Broxbourne Local Plan (2018 to 2033), as well as providing baseline information to assist in the determination of planning applications for retail and leisure development. The Study is considered to remain up-to-date, particularly in the case of the Waltham Cross area, with no major retail development taking place in or around the settlement following its publication.

Development Plan

Local Plan 2018-2033

5.5 The relevant policies of the Broxbourne Local Plan (2018 – 2033) are summarised in the following section:

Strategic Policies

- 5.6 **Policy DS1 (The Development Strategy)** explains that provision will be made for between 5,000 and 6,000 net additional jobs focusing on Brookfield, Park Plaza, Cheshunt Lakeside and the town centres (such as Waltham Cross) as well as provision being made for approximately 24,000 square metres of new retail development. Policy DS1 states that strategic development sites will include "Waltham Cross High Street North".

Place Making

- 5.7 **Policy PM1 (Sustainable Place Making)** states that new developments proposed within the Borough are required to complement existing town and villages and the countryside around them. Major developments must also establish their own identities through the implementation of sustainable place making principles.

Brookfield Riverside

- 5.8 The Council plans to develop the Brookfield area as a comprehensively planned garden suburb that will encompass a retail, civic, business and leisure centre, and Brookfield Garden Village. Brookfield will be home to about 5,000 people. Brookfield is currently the home of the Brookfield Centre (Tesco and M&S) and the Brookfield Retail Park. These will be incorporated into an expanded shopping, civic and leisure centre that will include shops, leisure space, civic facilities, apartments, amongst other uses.
- 5.9 **Policy BR1 (Brookfield Riverside)** explains that Brookfield Riverside (new town centre) will provide up to 19,000 sq. m net comparison retail floorspace; approximately 3,500 sq. m convenience floorspace; up to 10,000 sq. m of leisure floorspace; approximately 12,500 sq. m local office floorspace; approximately 250 new homes (40% of which should be affordable); elderly persons' accommodation; and a civic centre.

Waltham Cross Policies

- 5.10 **Policy WC1 (Waltham Cross Town Centre)** states that the Council will support proposals which accord with the following town centre priorities:
- *A vibrant town centre throughout the daytime and the evening;*
 - *Redevelopment of the northern High Street (see below);*
 - *Public realm improvements throughout the High Street and beyond;*
 - *Additional homes in and around the town centre; and*
 - *Conserving and where possible enhancing the historic environment.*
- 5.11 The introductory text to **Policy WC2 (Waltham Cross Northern High Street)** explains that the northern end of the High Street presently sees relatively low levels of footfall and has a level of vacancy higher than the southern end. It adds that 'big box' retailers Wickes (east of Sturlas Way) and Homebase (west of Sturlas Way) play a recognised role in the broad retail offer of the town but turn their back on this end of the street and create closure to the pedestrianised core, limiting footfall and the viability of the retail units. The text adds that previous endeavours to redevelop the northern end of the High Street for a retail led development have not attracted investors.

5.12 Accordingly, Policy WC2 proposes a mixed use solution comprising the following uses on the Homebase site:

- *On the land west of Sturlas Way, the potential for significant housing development, possibly as part of a mixed-use development incorporating the existing store;*
- *40% affordable housing (where residential development is proposed); and,*
- *Shops / commercial / community ground floor uses.*

5.13 The policy seeks the future development of the two sites as part of a comprehensive masterplan for a mixed-use quarter. It adds that this masterplan will need to consider reasonable options for the relocation of the Wickes and Homebase stores.

Retail

5.14 **Policy RTC1 (Retail Hierarchy)** is clear that the Local Planning Authority will permit town centre use development (such as food retail) within the defined centres identified on the proposals map, providing that this is compatible with their function and position within the retail hierarchy. Waltham Cross is classed as being a 'town centre' and heads the local retail hierarchy alongside Hoddesdon Town Centre.

5.15 The policy continues that 'main town centre' use development will not be permitted elsewhere in the Borough unless it satisfies national policy requirements relating to a sequential approach and impact assessment. The implication is therefore that retail development within the defined town centres does not need to demonstrate compliance with the retail impact or sequential tests – as equally articulated by national planning policy.

5.16 **Policy RTC2** concerns "**Development within Town, District and Local Centres, Neighbourhood Centres and Shopping Parades**". It states that the following criteria will be used to consider the acceptability of new development proposals, including extensions, alterations and changes of use within the Borough's town, district, and local centres:

(a) whether the development enhances the historic character of the centre (where relevant) and the public realm;

(b) the role of the centre and services it provides;

(c) the vitality and viability of the centre;

(d) the provision of safe access, full and complete servicing arrangements, and parking;

(e) any adverse impacts upon the centre or residents in terms of noise, fumes, smells, litter and general disturbance.

II. Planning applications for new development, including changes of use, within the above centres should have regard to the relevant Council strategy, including the town centre strategies for Hoddesdon or Waltham Cross, or the district centre strategy for Cheshunt Old Pond.

III. Street cafés and external seating, will be permitted provided that there is:

(a) no harm to the free flow of pedestrian and vehicular users of the highway,

(b) no adverse impact to neighbouring residents by reason of noise. The Council may impose shorter hours of operation than the parent premises to which the café relates.

Design

5.17 **Policy DSC1 (General Design Principles)** states that the Council expects a high standard of design for all development and wherever possible, development proposals must:

- (a) enhance local character and distinctiveness, taking into account: existing patterns of development; significant views; urban form; building typology and details; height; roof form; fenestration detail; materials; building lines and other setbacks; trees; landscaping; and features of local and historic significance;*
- (b) significant natural features on site such as trees, waterbodies, habitats, etc. should be dealt with sensitively and retained where-ever possible;*
- (c) increase permeability of the area by providing easy to navigate and safe physical connections with surrounding spaces, streets, paths and neighbouring development;*
- (d) consider surface drainage requirements from the outset and work with the local topography to create low maintenance SuDS;*
- (e) reinforce existing pedestrian connections and create new ones with a clear hierarchy of paths and streets that promote pedestrian friendly environments and active lifestyles;*
- (f) provide coherent and logical layouts with active frontages and good natural surveillance;*
- (g) create local landmarks and marker features for a well-defined townscape;*
- (h) increase accessibility to open spaces, sports and play facilities where-ever possible;*
- (i) avoid the creation of blank walls on public fronted elevations;*
- (j) mitigate against flooding and climate change through incorporation of features such as trees and planting, water bodies, retention/filter beds, permeable paving, green energy features and the retention/selection of appropriate materials.*

5.18 **Policy DSC2 (Extensions and Alterations to Existing Development)** relates to proposals of this nature and states that extensions and alterations to existing buildings will be required to respect the character and design of the original building.

5.19 **Policy DSC5 (Sustainable Construction)** requires that:

- I. All development must maximise the use of sustainable construction methods and materials. Proposals which can demonstrate the adaptability of the scheme and individual buildings to the challenges of climate change will be welcomed;*
- II. All development should incorporate homes, buildings and neighbourhoods that are flexible to future adaptation, including the changing needs of occupants and users;*
- III. Design and materials should ensure long term resilience and minimise ongoing maintenance; and,*

IV. *Re-use and recycling of building materials such as bricks should be carried out, and such materials re-used on site wherever possible, and (subject to site specific environmental and design considerations) in preference to natural aggregates or previously unused materials.*

5.20 **Policy DSC6 (Designing Out Crime)** states that applicants must demonstrate that they have considered all the following elements of any proposal:

- *That they have maximised opportunities for natural or passive surveillance and public facing frontages through the arrangement of buildings;*
- *Ensuring access routes are direct, signposted, safe and convenient;*
- *Avoiding the creation of blind corridors and narrow alleyways;*
- *Well planned street furniture, boundary treatments, planting and lighting;*
- *Ensuring that paths used for walking and cycling, areas used for cycle and car parking, and recreation and play areas are easily accessible, secure and widely visible.*

5.21 In addition, it states that security features should be designed in a sensitive manner which respects the overall character of the area and that on shop fronts and commercial premises, the use of architectural solutions combined with the use of open grill security shutters is strongly preferred.

5.22 **Policy DSC7 (Comprehensive Urban Regeneration)** states that the Council will pursue the comprehensive development of the strategic development allocations within the Plan and will resist piecemeal development of those areas that do not accord with agreed masterplan. In addition, the policy states that the Council will promote comprehensive regeneration elsewhere where it is appropriate to do so and will oppose developments that would compromise such regeneration or the implementation of the wider development of an area.

5.23 **Policy DSC8 (Shopfronts and Fascias)** states that new and altered shopfronts must respect the scale, proportion, character and materials of the building and adjoining buildings in the street scene. Shop fronts should also sit within the framework of the existing building structure and façade style. The policy states that new fascias will be determined by the following criteria:

- *the scale, proportion, character and materials of the fascia must respect the parent building, and the scale and depth of surrounding fascias/signs;*
- *fascias should not link two buildings which have distinctively separate design qualities;*
- *the size, scale and levels of illumination of fascias, must not have an adverse impact upon the amenity of people living nearby, nor contribute disproportionately to light pollution; and,*
- *the advertisement must not have an impact upon the safety of highway users. See also policies on Designing Out Crime and Advertisements and Signage.*

Transport and Access

5.24 **Policy TM1 (Sustainable Transport)** states that the Council will expect all major development proposals to show how ways to reduce car use and promote alternative ways to travel have been considered and incorporated

into the development. Detailed evidence of this process must be included in the Transport Assessment and supporting Travel Plan accompanying a planning application. With regards to pedestrian movement, the policy states:

- II. Development must not detrimentally impact upon existing footpaths and public rights of way and proposals should, wherever possible, extend, enhance or provide for new pathways, rights of ways and equestrian routes.*
- III. Development proposals must clearly demonstrate how pedestrian movement and connections have been prioritised and provided for.*
- IV. All new paths should be safe, direct, appropriately lit and signed. They should be suitably constructed for all users, and provide direct and easy access to services and facilities.*
- V. The Council will support proposals that protect and enhance the New River towpath, pedestrian routes to, and within, the Lee Valley Regional Park and connections by foot to other open spaces.*

- 5.25 The policy also requires development proposals to provide for cycle facilities through the use of accessible and safe routes to and around the site, as well as the provision of cycle storage and cycle parking areas. Finally, policy TM1 states that all major developments should contribute to improved public transport, including infrastructure and revenue contributions for enhanced services, and should ensure that internal layouts do not impede the passage of buses.
- 5.26 **Policy TM2 (Transport and New Developments)** states that development will not be permitted where there would be a severe impact on the transport network. Development proposals must ensure that the safety of all movement corridor users is not compromised. A Transport Assessment or Statement is required to be submitted with a planning application and Travel Plans must be submitted where the development involves major residential development, employment and other commercial development, and non-residential institutions such as schools and colleges. Finally, the policy states that the Council will encourage the use of appropriate design and traffic calming measures to meet the needs of various movement corridors users.
- 5.27 **Policy TM3 (Access and Servicing)** states that new development proposals must provide for adequate, safe and convenient servicing arrangements, access points and drop off areas. In addition, it states that adequate provision must be made for the movement and turning of emergency vehicles and refuse vehicles in all developments.
- 5.28 **Policy TM4 (Electric Vehicle Charging Points)** states that at least 20% of all new parking spaces for new retail and commercial development must be fitted with active EV charging points, with passive provision for all remaining spaces. Furthermore, all cabling and charging points for commercial parking spaces must be capable of supplying a rapid charging service.
- 5.29 **Policy TM5 (Parking Guidelines)** refers to Car Parking Guidelines in Appendix B. It continues that the Council will seek a sensible balance of car and cycle parking spaces based on the nature of the proposal, site context and wider surrounding area, and accessibility of shops, services and sustainable transport infrastructure, with the overall aim of reducing private car use.

Water

- 5.30 **Policy W2 (Water Quality)** requires a drainage strategy or plan to be submitted with all applications showing how (a) rain water runoff will be managed on site both during and following heavy rainfall; and (b) how foul and surface water will be managed and disposed of.

Biodiversity and Landscaping

- 5.31 **Policy NEB1 (General Strategy for Biodiversity Development)** explains that proposals will be expected to apply the mitigation hierarchy of avoidance, mitigation and compensation and that they should result in net gains to biodiversity wherever possible.
- 5.32 **Policy NEB4 (Landscaping and Biodiversity in New Developments)** States that proposals for new development must submit details on how existing landscaping will be protected, enhanced and integrated into the development.

Residential Amenity

- 5.33 **Policy EQ1 (Residential and Environmental Quality)** states that all proposals for development within the urban area must avoid detrimental impacts on the amenities enjoyed by the occupiers of neighbouring properties in terms of daylight, sunlight, outlook and overlooking. It also states that proposals which generate dust, noise and odour must not result in a material harm to the amenity levels currently enjoyed in an area. Finally, it states that all development proposals must include provision for the storage of refuse and recycling facilities.
- 5.34 **Policy EQ4 (Noise)** states that new development, and extensions or alteration to existing developments, emitting noise levels noticeably above background levels on a consistent or consistently periodic basis, should be sited away from noise sensitive land uses including residential accommodation, schools and health facilities. If this is unavoidable, the Council will consider a range of factors, including the acceptability of measures incorporated into development proposals to mitigate the impact of noise on noise sensitive land uses.

Other Policies

- 5.35 **Policy INF1 (Infrastructure)** states that the Council will implement its Infrastructure Delivery Plan, updated on an annual basis, to assist in securing the appropriate provision, financing and phasing of development and infrastructure.
- 5.36 **Policy PO1 (Planning Obligations)** states that planning obligations will be sought by the Council to deliver sustainable development and may include (but is not limited to) measures to mitigate the impacts of development and to meet the costs of associated infrastructure.
- 5.37 **Policy IMP1 (Delivery of Development)** states how the Council will as a last resort consider the use of compulsory purchase or other appropriate powers to deliver the policies of this Local Plan.

Material Considerations (National)

National Planning Policy Framework (February 2019)

- 5.38 On 19th February 2019 the Government published a revised version of the NPPF. The most recent NPPF is a material consideration in the determination of all planning applications and fully replaces the March 2012 and July 2018 editions.
- 5.39 The NPPF does not change the statutory status of the Development Plan as the starting point for decision making. It advises that proposed development that accords with an up-to-date Local Plan should be approved, and proposed development that conflicts should be refused unless other material considerations indicate otherwise.
- 5.40 The overall emphasis of the NPPF is to reiterate the Government's key objectives of facilitating economic growth and securing sustainable development. These overarching policies seek to deliver development in the most appropriate locations, thereby protecting and enhancing the environment.

Presumption in Favour of Sustainable Development

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

"Plans and decisions should apply a presumption in favour of sustainable development.

*For **decision-taking** this means:*

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

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

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

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

Ensuring the vitality of town centres

- 5.43 Town centre policies are dealt with at Section 7 of the NPPF, under the title '*ensuring the vitality of town centres*'.
- 5.44 Paragraph 85 states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.
- 5.45 With regards the sequential test, Paragraph 86 of the national policy document explains that:
- "Local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered"*.
- 5.46 'Main town centre' uses are defined within Annex 2 of the NPPF as: retail development, leisure, entertainment facilities, more intensive sport and recreation uses (including restaurants), offices, arts, culture and tourism development (including hotels).
- 5.47 For the purposes of the application of the sequential test, Annex 2 of the NPPF explains that an 'edge-of-centre' retail development site is defined as a location that is '*well connected and up to 300m from the primary shopping area*' (NPPF, Annex 2, Page 66). By implication, an 'in-centre' site is one which falls within the primary shopping area, whilst an out-of-centre site is one which is beyond 300m from the primary shopping area and is not 'well connected' to it. The NPPF is clear that in determining whether a site falls within the definition of 'edge-of-centre', account should be taken of local circumstances.
- 5.48 Importantly, Paragraph 87 of the NPPF explains that when considering edge-of-centre and out-of-centre proposals in the context of the sequential approach, preference should be given to accessible sites which are well connected to the town centre. It also states that applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre sites are fully explored.
- 5.49 Paragraph 89 states that when assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, LPAs should require an impact assessment if the development is over a proportionate, locally set threshold (or otherwise over 2,500 sq.m). This should include an assessment of:
- the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and,
 - the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

5.50 Finally, Paragraph 90 of the NPPF states that where an application fails to satisfy the sequential test it should be refused. The implication being that were such a policy conflict is not identified planning permission should be granted.

National Planning Practice Guidance (March 2014)

5.51 On 6th March 2014 the Department for Communities and Local Government ('DCLG') launched the Planning Practice Guidance ('Practice Guidance') web-based resource, which as of 18th September 2020, has been updated to reflect changes to legislation. The Practice Guidance does not constitute a statement of Government policy; however, as a guide to interpreting how policy should be applied, it may be material to individual planning decisions.

5.52 Of particular relevance to applications for retail development is the chapter titled 'Town Centres and Retail'. This provides guidance on the interpretation of the sequential and impact tests, amongst other matters. A summary of the key sections within this chapter are set out below.

5.53 The section, '*What is the sequential test?*' explains that the purpose of the sequential test is to guide 'main town centre uses' towards town centre locations first, and then, if no town centre locations are available, to out-of-centre locations, with a preference for accessible sites which are well connected to the town centre.

5.54 When applying the sequential test as part of the decision-making process, the Practice Guidance explains that it is for applicants to demonstrate compliance and that failure to undertake the exercise could in itself constitute a reason for refusing planning permission.

5.55 There are a number of considerations that should be taken into account in determining whether a proposal complies with the sequential test. Of particular significance is the requirement to examine whether there is scope for 'flexibility' in the format and/or scale of the proposal? In the case of retail and leisure development, this typically involves considering whether there is any 'flexibility' in a specific business model. For example, are multi-level formats possible? Whether flexible car parking arrangements can be pursued? Innovative servicing solutions introduced? Or a willingness to depart from standard formats explored. It is significant that 'disaggregation' (breaking a scheme up across several sites) is not identified as a matter necessary for consideration in demonstrating 'flexibility' in the context of the sequential test.

5.56 The section, '*How should locational requirements be considered in the sequential test?*' highlights that the use of the sequential test should recognise that some 'main town centre uses' have particular market and locational requirements. This means that certain uses may only be accommodated in specific locations and Local Planning Authorities should be acceptant of this where a robust justification is provided. See Paragraph: 012 / Reference ID: 2b-012-20190722.

5.57 The section, '*How should viability be promoted?*' emphasises that whilst the sequential test seeks to deliver the Government's 'town centre first' policy, promoting new development on town centre locations can be more expensive and complicated than building elsewhere and Local Planning Authorities therefore need to be realistic and flexible in terms of their expectations.

- 5.58 In terms of the retail impact test, of greatest relevance to any quantitative analysis is considered to be paragraph 15 (Reference ID: 2b-015-20190722) of the guidance, which explains that as a guiding principle impact should be assessed on a like-for-like basis in respect of that particular sector (e.g. it may not be appropriate to compare the impact of an out of centre DIY store with small scale town-centre stores as they would normally not compete directly). It continues that retail uses tend to compete with their most comparable, competitive facilities and that conditions may be attached to appropriately control the impact of a particular use.
- 5.59 With regards impact on investment, paragraph 15 (Reference ID: 2b-015-20190722) explains that where wider town centre developments or investments are in progress, it will also be appropriate to assess the impact of relevant applications on that investment and that key considerations will include:
- the policy status of the investment (i.e. whether it is outlined in the Development Plan);
 - the progress made towards securing the investment (for example if contracts are established); and,
 - the extent to which an application is likely to undermine planned developments or investments based on the effects on current/forecast turnovers, operator demand and investor confidence.
- 5.60 Paragraph 17 (Reference ID: 2b-017-20190722) explains that the retail impact test should be undertaken in a proportionate and locally appropriate way, drawing on existing information where possible. Meanwhile, paragraph 18 (Reference ID: 2b-018-20190722) states that the judgement as to whether the likely adverse impacts are 'significant' can only be reached in light of local circumstances. For example, in areas where there are high levels of vacancy and limited retailer demand, even very modest trade diversion from a new development may lead to a significant adverse impact.

Material Considerations (Local)

Waltham Cross Town Centre Strategy (March 2015)

- 5.61 A Town Centre Strategy was prepared for Waltham Cross in 2015 to guide the development and regeneration of the town centre over the medium to long term. The strategy does not form part of the development plan but represents a material consideration in the determination of planning applications.
- 5.62 Some of the key objectives outlined for Waltham Cross on Page 12 of the document include it:
- Hosting a wide range of shops, supermarkets, entertainment, services, and places to eat and drink, supported by a lively street market and diverse community events;
 - Be the first choice for residents of Waltham Cross and southern Cheshunt;
 - Be a well regarded retail and leisure destination for residents of south Hertfordshire; and,
 - Remain active and busy throughout the evening as well as the daytime.
- 5.63 Of particular relevance to the planning application site is the Waltham Cross '*Northern High Street Opportunity Zone*' – which is outlined on Page 24 of the report. This comprises the town centre's Homebase and Wickes

stores and their associated car parks, as well as adjacent small-scale retail units - all of which are located at the northern end of the defined centre.

5.64 The strategy (Page 24) states that the 'exposure of this area could be improved' by revising existing highway access arrangements to improve the public realm. The Council further considers that doing this could unlock the opportunity for a mixed-use redevelopment of the area north of Park Lane to provide a mix of uses that 'complement and connect more strongly with the town centre'. It continues that the Council will seek to work with landowners and tenants of the Wickes site, as well as the adjacent Homebase site to its west, to investigate their potential for redevelopment. Finally, the document adds that the Council would not rule out the use of Compulsory Purchase powers to enable this element of the town centre strategy to proceed.

5.65 Of note is the fact that the diagram of the 'Opportunity Zone Northern High Street' shown on Page 24 of the Strategy highlights the Homebase store to be a 'potential inclusion' rather than the 'main opportunity site' of the Northern High Street area - which is the Wickes retail unit and the terraced shop units to its south.

5.66 Furthermore, Page 30 of the Strategy states that:

"the Council will engage with Wickes to investigate the potential for a reformatting or redevelopment of the site within this broad opportunity zone and for the creation of new retail frontage to deliver continuity to the town centre. In addition to this site, the Homebase site to the north-west of the core town centre may offer further potential for a broader range of town centre uses through a mixed-use development and stronger linkages to the town centre core" (our emphasis).

5.67 Our observation on the above quote is that, again, the Homebase site is regarded as a secondary opportunity, with the Wickes site the first priority for redevelopment in order to deliver the 'Northern High Street Opportunity Zone'.

Broxbourne Retail & Leisure Study (July 2015) and accompanying Addendum (June 2016)

5.68 WYG prepared the Broxbourne Retail & Leisure Study ('BRLS') in July 2015 and a subsequent addendum in 2016. The purpose of the Study is to provide an assessment of retail and leisure needs and capacity in the period to 2030, and to review the current performance of Waltham Cross and Hoddesdon Town Centres, Cheshunt District Centre, and various neighbourhood centres and local centres within the borough. The Study acted as the evidence base to inform the Broxbourne Local Plan (2018 to 2033), as well as providing baseline information to assist in the determination of planning applications for retail and leisure development. The Study is considered to remain up-to-date, particularly in the case of the Waltham Cross area, with no major retail development taking place in or around the settlement following its publication.

5.69 The Retail Study Addendum of June 2016 provides the latest convenience goods expenditure capacity projects for the authority area, and also identifies the trading performance of all key foodstores. In particular the 2016 addendum finds that:

- The addendum forecasts that by 2025, even allowing for committed development, there is surplus convenience goods expenditure capacity of £70.3m, which is sufficient to accommodate 5,700 sq. m to 7,200 sq. m (net sales) of new convenience goods floorspace.

- We are aware of the Council's retail plans for Brookfield. However, the Council authored Brookfield Retail & Leisure Impact Study (February 2017) only identifies that broadly half (or 3,000 sq. m) of the borough's convenience goods retail floorspace requirement will be met through this scheme – leaving a residual requirement of at least 2,700 sq. m net over the plan period.
- Finally, Table 5 of Appendix I (Statistical Tables) of the Retail Study Addendum presents the *“survey-derived performance of stores compared to expected benchmark performance”* it shows that:
 - Lidl, High Street, Waltham Cross is overtrading by +£8.6m; and,
 - Sainsbury's, The Pavilion High Street, Waltham Cross is overtrading by £4.5m.

5.70 Whilst the Iceland store in Waltham Cross town centre is found to be trading slightly below benchmark levels, the 2016 Retail Study addendum suggests that the centre's food retail offer as a whole is performing at +£10.6m above benchmark levels. This expenditure surplus is sufficient to accommodate the turnover of a new discount foodstore and indicates that there is a requirement for increased choice and competition in the food retail offer provided in Waltham Cross town centre.

6. Planning Policy Appraisal

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

Principle of Development

Town Centre First Approach

- 6.2 The existing Homebase unit and its associated car park lies wholly within Waltham Cross town centre, as defined on the policies map which accompanies the recently adopted Local Plan (June 2020). Accordingly, the site is classified as being 'in-centre' in the context of both local and national town centre policy guidance. 'In-centre' sites are regarded as the most 'sequentially preferable' and appropriate locations in which to accommodate new retail floorspace, with such development entirely consistent with the Government's longstanding 'town centre first' approach.
- 6.3 Given its town centre location, the application site is also both sustainably and accessibly located to the surrounding residential catchment that it will serve. The introduction of Aldi in a 'gateway location' at the northern end of the high street will provide a further, important 'in-centre' foodstore anchor for Waltham Cross town centre, complementing the existing Lidl foodstore at the southern end, and the centrally located Sainsbury's store.
- 6.4 The Aldi store will drive footfall, promote linked shopping trips, and stimulate spin-off trade for existing local businesses, particularly those at the northern end of the high-street, thereby enhancing the centre's overall 'vitality and viability' during what remains a challenging period for the retail sector. The introduction of Aldi will also enhance consumer choice in Waltham Cross' convenience retail sector, with the Council's Retail Study Addendum (June 2016) finding that both Lidl, High Street and Sainsbury's, The Pavilion Centre are 'overtrading' by a combined £13m (see Table 5, Appendix I, Retail Addendum). It is therefore quite clear that the town centre is in need of additional, appropriately sized foodstore competition and the application site is the only opportunity to provide this.
- 6.5 The Aldi store will also bring new, accessibly located jobs to the town centre, creating 40-50 quality full and part-time positions for local people, whilst delivering further indirect jobs through services supporting the new facility. This is in addition to the retention of existing local jobs at the Homebase store, which will otherwise likely be lost in time if the retailer is unable to sustainably downsize their current operation. Aldi's investment will enable Homebase to viably 'right-size' their unit, making it more commensurate with their future business requirements, and allowing them to continue to serve Waltham Cross residents' home improvement needs.
- 6.6 Based on this justification, it is quite clear that the principle of providing a proportionately scaled discount foodstore on this 'in-centre' site is entirely consistent with the overarching objective of national planning policy, to promote the vitality and viability of our town centres. Ordinarily, little more would need to be said regarding the acceptability of the principle of the proposed land use. However, in this case Policy WC2 of the Local Plan is of relevance, which promotes the application site for future redevelopment as part of a new mixed-use quarter to be known as "Waltham Cross Northern High Street".

Implications of Policy WC2 and its Aspirations for Mixed-use Development

- 6.7 In relation to the planning application site (land west of Sturlas Way) Policy WC2 states that “there is potential for significant housing development, possibly as part of a mixed-use development incorporating the existing store”. It adds that the site is to be developed in accordance with a comprehensive masterplan, alongside the Wickes unit to the east of the application site and terrace unit shops to the south (which are together earmarked for 150 dwellings in the plan). The policy also explains that such a masterplan will need to consider reasonable options for the future relocation of both of the existing large format units on the site (i.e. Homebase and Wickes).
- 6.8 In terms of the implications of this adopted, site specific policy for the current application proposals; whilst the applicant acknowledges that the scheme before the Council does not seek to deliver residential-led mixed-use development on the site at the current time, nor does it preclude this from taking place over the plan period to 2033.
- 6.9 The current application is simple in nature, involving the re-use of an existing retail unit to form a foodstore and non-food retail unit. The scheme can be delivered quickly, and will bring with it a wide range of social and economic benefits over the short-term (as expressed in the above paragraphs). In contrast, it is clear that the Council’s aspirations for the comprehensive mixed-use redevelopment of the northern end of Waltham Cross town centre is a project that will be a considerable number of years in the making.
- 6.10 This is emphasised by the Council’s own Strategic Housing Land Availability Assessment (‘SHLAA’) which was published in June 2017, and forms part of the evidence base for the recently adopted Local Plan. The planning application site forms part of SLAA site reference number WX-U-13 and whilst it is identified as an ‘achievable’ location for future residential development, this is over a period of 11-15 years. Furthermore, the site pro-forma references the fact that this is likely to be a development opportunity that will come forward at the end of the Plan period – which runs to 2033 (13 years from the present).
- 6.11 Accordingly, it is quite clear that the scheme before the Council could be realised and operational for the best part of a decade before the site was even in a position to be redeveloped for the alternative uses identified under Policy WC2 (based on SHLAA timescales). To refuse the application on the basis of a long-term planning strategy could therefore risk the site lying vacant and contributing nothing to the local economy for a considerable number of years.
- 6.12 Aligned to the above concern, a further important factor to consider is – when will there be the necessary market demand for high-rise residential development in Waltham Cross town centre to make the concept of the residential-led ‘Northern High Street’ mixed-use scheme a viable proposition for a developer? There can be no debate that the realisation of the scheme is largely contingent on the delivery of Transport for London’s (‘TfL’) Crossrail 2 rail capacity upgrade project and the effect this would have on land values and housing demand. This demand is clearly not currently existing, owing to the slow and infrequent rail service provided from Waltham Cross to London. This is reflected in the relatively few high rise residential buildings present in and around the town centre.
- 6.13 The supporting text for Policy WC4 of the Local Plan (‘Crossrail 2 and the Renaissance of Waltham Cross’) heavily implies that the realisation of future high-density, residential-led development in and around Waltham

Cross town centre would be dependent upon the delivery of Crossrail 2's proposed upgrade of Waltham Cross station and increased train frequencies. This is seemingly why only the 'Northern High Street' site has been allocated for residential-led redevelopment in the Local Plan, and this is identified as an opportunity which will be realised at the end of the Plan period (i.e. early 2030's) – with the Crossrail 2 investment originally forecast for the end of the current decade.

- 6.14 Given the intrinsic link between Crossrail 2, land values, and residential demand in Waltham Cross town centre, it is highly significant that in early 2021 TfL officially confirmed that the rail upgrade project had been put on hold indefinitely. This is owing to the significant cost of the project and the implications of the COVID-19 pandemic, which has dramatically reduced public transport usage. The fact that Crossrail 2 is presently mothballed, with no revised timetable published, casts significant doubt over whether Waltham Cross station and rail line will be upgraded over a timeframe commensurate with the Plan period. This in turn reinforces the evidence that the 'Northern High Street' scheme is unlikely to be a viable development proposition over the coming decade, and its delivery at the end of the plan period (i.e. early 2030s) currently appears a 'best case' scenario without the regenerative effects of Crossrail.

Conclusions – Principle of Development and Policy WC2

- 6.15 Drawing the above analysis together, it has been highlighted that the principle of retail development on the application site is wholly in accordance with the thrust of national planning policy for town centres, as set out in Section 7 of the NPPF. The modifications proposed to the building, which would result in a new Aldi foodstore and retained Homebase store, would deliver in a multitude of significant benefits for Waltham Cross town centre that would be realised over the short-term. This includes improving a 'gateway' town centre site, driving new footfall through the centre, promoting linked shopping trips, stimulating spin-off trade for other businesses, increasing consumer choice and competition, and creating both new and retained retail jobs.
- 6.16 It is acknowledged that the unit's refurbishment proposals do not seek to deliver residential-led, mixed-use development on the site, as sought by Policy WC2, however nor do they preclude this from taking place at some point in the future when this is viable. Indeed, in our view all evidence suggests that the realisation of a comprehensive, residential-led, mixed-use scheme on the site is something that will only be achieved over the long-term and is unlikely to benefit from the necessary market demand / values over the course of the following decade. This is owing to the fact that the town centre's residential-led re-development is intrinsically linked to Crossrail 2, and all signs point to this not now being realised over the plan period - as a consequence of the coronavirus pandemic and the project being indefinitely put on hold by TfL.
- 6.17 In summary, we do not consider the application proposals to directly conflict with Policy WC2 of the Local Plan, in that modifying and re-using the site's existing retail unit does not preclude its long-term redevelopment for the uses suggested in the Plan. The application proposals will offer a welcome boost to the '*vitality and viability*' of Waltham Cross town centre over the short to medium-term, ensuring that the site does not fall vacant, and delivering a host of other benefits which have been outlined in this section. Should market demand for high-rise residential development increase as a consequence of Crossrail 2 being introduced in the future, then the option of the site's mixed-use redevelopment can still then be fully explored at that point, in-line with the Local Plan policy for the site.

Town Centre Policy

6.18 The preceding sub-section has explained that the principle of retail development on the application site (an in-centre location) is wholly in accordance with the thrust of national planning policy for town centres, as set out in Section 7 of the NPPF. This given that the modifications proposed to the building, which would result in a new Aldi foodstore and retained Homebase store, will offer a welcome boost to the 'vitality and viability' of Waltham Cross town centre and would deliver in a multitude of other significant economic and social benefits for the centre.

6.19 Notwithstanding this, Local Plan **Policy RTC2** ('Development within Town, District and Local Centres, Neighbourhood Centres and Shopping Parades') outlines criteria which are used to consider the acceptability of new retail development proposals (including extensions and alterations) within the Borough's town centres. Accordingly, we briefly summarise the scheme's compliance with these requirements (where applicable) below:

(a) whether the development enhances the historic character of the centre (where relevant) and the public realm;

6.20 This criterion is not considered to be of direct relevance to the proposal to modify, refurbish and extend the existing Homebase unit on Sturlas Way. The retail unit already exists, and the external works proposed will modernise and refresh the primary public facing elevations of the building, giving it a far more contemporary feel than at present. This will be to the benefit of the surrounding local environment, including the setting of any heritage assets. Notwithstanding this, we are aware that the closest heritage assets are three Grade II listed shop units on High Street (no 207, 226 & 228). Given that these units are each 100m from the application site, the relatively minor external works proposed will have no material impact on their respective settings.

(b) the role of the centre and services it provides;

6.21 In respect of this criterion, the main consideration must be whether the introduction of a discount foodstore is appropriate within a centre of this order in local retail hierarchy. In this regard, Local Plan Policy RTC1 ('Retail Hierarchy') identifies Waltham Cross at the very top of the local retail hierarchy, as one of Broxbourne's town centres. Accordingly, it can be robustly concluded that the introduction of a 1,315 sq. m (net sales) discount foodstore is commensurate with the centre's 'role and function' as an important local service centre.

(c) the vitality and viability of the centre;

6.22 Based on an up-to-date Experian GOAD town centre report (dated November 2020), Waltham Cross is found to contain over 150 shop units and some 39,000 sq. m of floorspace. This includes a number of prominent national multiple retailers including Argos, Boots, W H Smith, New Look, Superdrug and Vodafone. Many of these retailers are housed within the centre's covered shopping mall – The Pavilions Centre. The town centre also benefits from two existing foodstores in the form of Lidl at the very southern end of the centre and a Sainsbury's supermarket contained within the Pavilions Centre.

6.23 From our impressions, Waltham Cross appears to be a popular and well used town centre, and Experian GOAD data from November 2020 finds it to have a vacancy rate of just 7.6% - compared to a national average of

13.4%. This is no doubt helped by the fact that much of the town centre is pedestrianised, making it a pleasant environment for visitors to move around. Accordingly, it can be concluded based on up-to-date diversity of use evidence and its other qualities that Waltham Cross is a 'vital and viable' town centre.

6.24 Notwithstanding this, it is considered that the provision of a new 'anchor' discount foodstore in a gateway location at the top of the high street has the potential to further enhance the town centre's current health. This is given that it will drive further footfall through the centre, promote linked shopping trips, stimulate spin-off trade for other businesses, and increase consumer choice and competition. Finally, it will create both new and retained retail jobs.

(d) the provision of safe access, full and complete servicing arrangements, and parking;

6.25 Given that the retail unit already exists, is operational, and benefits from a dedicated vehicular access, car parking provision and servicing areas, it is considered that this criterion is already robustly met.

(e) any adverse impacts upon the centre or residents in terms of noise, fumes, smells, litter and general disturbance.

6.26 Given that the retail unit already exists and is operational, it is not considered that the refurbishment works proposed would lead to any unacceptable impacts on the amenities of neighbouring residential occupiers. Notwithstanding this, the planning application is supported by a Noise Impact Assessment prepared by Noise Solutions Limited. This robustly concludes that there is no potential for the operational or serving hours proposed at the new discount foodstore to result in any significant adverse impacts upon the amenities of surrounding residential occupiers.

II. Planning applications for new development, including changes of use, within the above centres should have regard to the relevant Council strategy, including the town centre strategy for Waltham Cross

6.27 Our justification in relation to this criterion is reflective of the sub-section above concerning the 'principle of development' and specifically compliance with Local Plan Policy WC2. In summary, we do not consider the application proposals directly conflict with Waltham Cross Town Centre Strategy, in that modifying and re-using the site's existing retail unit does not preclude its long-term redevelopment for the mix of uses envisaged by the Strategy.

6.28 The application proposals will offer a welcome boost to the 'vitality and viability' of Waltham Cross town centre over the short to medium-term, ensuring that the site does not fall vacant, and delivering a host of other social and economic benefits. Should market demand for high-rise residential development increase as a consequence of Crossrail 2 being introduced in the future, then the option of the site's mixed-use redevelopment can still then be fully explored at that time, in-line with the Local Plan site specific policy for the site.

Town Centre Policy - Conclusions

6.29 This sub-section has demonstrated that the application proposals meet the requirements of local town centre Policy RTC2, as an acceptable retail use within one of the Borough's defined centres. This is as well as

according with the relevant, corresponding town policies contained within the NPPF and meeting the wider national policy objective of delivering sustainable economic growth.

Transportation and Highways

- 6.30 Transport and accessibility issues are covered in detail in the supporting Transport Assessment prepared by Connect Transport Consultants. Some of the key conclusions which are relevant to the objectives of Local Plan transportation Policies TM1 (Sustainable Transport), TM2 (Transport and New Developments), TM3 (Access and Servicing) and TM4 (Electric Vehicle Charging Points) are set out below.
- 6.31 In terms of accessibility, the application site is appropriately served by public transport, with the nearest bus stops 120m to the north of the site on High Street. They provide services to Hertford and Cheshunt in the north, Waltham Abbey in the East, Waltham Cross further south and Potters Bar to the east. The publication 'Planning for Public Transport in Developments' produced by the Institution of Highways and Transportation ('IHT') specifies that new developments should be located within 400m of the nearest bus stop. This is evidently the case in this instance.
- 6.32 The site is also located 350m (a few minutes' walk) south of Theobalds Grove Train Station, which provides a direct regular service to Cheshunt and central London. It is also 700m north-west of Waltham Cross train station, which provides a direct regular service to central London, Hertford, Bishops Stortford and Stratford.
- 6.33 With regards pedestrian access, the site benefits from a sizable walk-in catchment given its town centre location. The IHT guidance document titled 'Providing for Journeys on Foot' identifies a maximum walk distance of 2.0km for commuter, school and sightseeing walk trips, 800m for town centre walk trips, and 1.2km for trips elsewhere. Based on the walk catchment distances identified by the IHT, there are a considerable number of residences within the 800m 'customer' walk catchment area including the densely populated residential areas to the north and south. Furthermore, much of Waltham Cross falls within a 2km 'commuter' walk catchment, meaning that many staff employed from the surrounding area could reasonably walk to work.
- 6.34 In terms of pedestrian highway infrastructure, all immediately surrounding roads are flanked by footways and are appropriately lit, including Sturlas Way. In light of the local pedestrian facilities present, the site is evidently well connected to the local pedestrian network with opportunities for customers to make trips by foot.
- 6.35 Finally, it should be noted that the application site is also accessible by bicycle, with good quality cycle infrastructure provided within the immediate vicinity. Given that the roads local to the site are urban in character, cycling provides the opportunity to access the future foodstore by a sustainable mode of transport. Provision for safe and convenient walking and cycling provision is to be made within the site itself, with level pedestrian routes and cycle parking provided for both foodstore customers and staff. These measures will encourage customers and employees to travel by cycle.
- 6.36 The Transport Assessment confirms that HGV access to the site / 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 showing this entering and leaving the site safely and in forward gear. Furthermore, personal injury accident data presented as part of the Transport

Assessment suggests that there is no particular trend or pattern of road accidents in the vicinity of the site resulting from any deficiencies in the local road network, or the operation of the site.

- 6.37 Significantly, the traffic impact section of the accompanying Transport Assessment concludes that the proposal will not have an adverse impact upon the safe and efficient operation of the existing local highway network both now and in the future. This is based on operational capacity assessments of surrounding junctions.
- 6.38 Finally, a car parking capacity assessment undertaken as part of the Transport Assessment demonstrates that the proposed car park will operate within capacity. The maximum weekday occupation has been calculated to be 71 vehicles, which equates to 44% occupancy. The maximum Saturday demand has been calculated to be 102 vehicles, which equates to 63% occupancy. The results of the accumulation assessment show that the proposed parking provision is entirely suitable for the uses proposed. Furthermore, as part of the revised parking layout, the scheme will provide 4 new Electric Vehicle Charging Points ('EVCP') and below ground infrastructure will be put in place to add up to a further 16 EVCPs in the future.
- 6.39 In summary, it has been demonstrated that the proposed development will accord with Local Plan Transportation Policies TM1, TM2, TM3 and TM4; and, more generally, the transportation and access policies of the NPPF.

Residential Amenity and Noise

- 6.40 Policy EQ1 (Residential and Environmental Quality) of the Local Plan states that all proposals for development within the urban area must avoid detrimental impacts on the amenities enjoyed by the occupiers of neighbouring properties. Meanwhile, Policy EQ4 deals with matters of noise impact. The closest residential properties to the application site are to the south and west of the site, with their rear elevations at least 35m from the back of the existing retail unit. Impact upon these dwellings will be the main consideration when assessing the acceptability, albeit it is important to emphasise that Homebase already service the unit daily for the existing service yard without complaint.
- 6.41 Following the introduction of Aldi, servicing access will continue to be taken from Sturlas Way utilising the same vehicular access junction as provided for customer traffic. The Homebase unit's servicing arrangements will remain as existing. The servicing yard will continue to be positioned on the site's western boundary (south-western corner of the site). It will be accessed via a servicing road immediately south of the building and adjacent to the southern boundary. It is also understood that Homebase's servicing frequency and duration will remain as it currently does and therefore requires no further justification as part of this Planning Statement.
- 6.42 The Aldi store's new servicing dock will be positioned at the foodstore building's south-eastern corner (south-eastern corner of the site). The position selected provides a good separation distance (circa 45m) from the elevations of the closest residential property to the south on Ruthven Road.
- 6.43 A Noise Impact Assessment has been prepared in support of the planning application by Noise Solutions Limited. The focus of this report is the external plant and deliveries at the proposed Aldi unit, with the Homebase retail operation (including servicing and mechanical plant) already lawfully permitted and in existence.

- 6.44 This assessment concludes that servicing procedures undertaken at the Aldi foodstore between 06.30 and 23.00 Monday to Saturday and between 08.00 and 17.00 on Sunday would have at worst a negligible noise impact, assessed using the method in BS 4142:2014. It also highlights that noise from the proposed external plant will comply with the Local Authority's Local Plan requirements. It should be noted that these findings were based on there being no acoustic mitigation provided as part of the planning application. On this basis, the Noise Impact Assessment concludes that noise from external plant and delivery activities should not be a reason for refusal of planning permission.
- 6.45 In considering noise impacts, it is also important to recognise the site's long-established non-food retail use and current daily servicing arrangements. The site's town centre location in particular means that, whatever its future use, it will most likely involve day-to-day retail, commercial or leisure activity and noise associated with the comings and goings of customers and deliveries. This is important in the context of the current planning application, particularly given the carefully regulated opening and servicing hours proposed by Aldi.
- 6.46 In summary, evidence suggests that there is no potential for the operational or serving hours proposed at the refurbished retail unit 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 Noise Solutions Limited. Compliance can therefore be demonstrated with Policies EQ1 and EQ4 of the Local Plan and the NPPF.

Design and Built Environment

- 6.47 The Built Environment and Design policies (particularly policies DSC1, DSC5, DSC6 and DSC7) of the Broxbourne Local Plan establish a number of urban design principles that new development within the borough should reflect, and also seeks to ensure that all development is: attractive, sensitive, distinctive, connected, environmentally sustainable, easy to use, safe, and respects the character of the surrounding area.
- 6.48 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. However, in summary, the proposed layout clearly offers the greatest potential for integration with the wider retail uses of Waltham Cross town centre, given that straightforward pedestrian access to Sturlas Way will be achieved and a clear desire line will be established from the foodstore's entrance south towards the wider town centre's offer (via new access points onto the pedestrian highway on the eastern boundary).
- 6.49 A key objective of 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 into Waltham Cross town centre from the north via the A121. Re-orientating the customer entrances to the northern elevation of the existing unit offers the potential to provide both a presence to Winston Churchill Way and will also give passers-by a view that will take in the unit's active frontages and boundary landscaping – highlighting pedestrian movement and providing visual interest.
- 6.50 In terms of design, the proposed external alterations to the existing building (to create two separate units), promotes a clean, contemporary approach. In particular, the design changes will involve utilising extensive

glazing on the unit's northern elevation. Here, the building will benefit from two feature projecting glazed customer entrance façades.

- 6.51 The extensive use of glazing on the foodstore's most prominent northern elevation will offer views into the sales areas for passers-by along Winston Churchill Way and Sturlas Way, adding interest to this elevation and creating an inviting, active frontage to the scheme. The use of glazing will also provide an expansive customer entrance and allow natural light to permeate throughout the foodstore, thus reducing lighting requirements and creating a more pleasurable shopping experience.
- 6.52 Alongside the extensive new glazing to the northern elevation, the application seeks to modernise and refresh the primary public facing elevations of the building in other ways. For example, the existing brick panels between the brick piers on the east and north facing elevations will be covered with new white render finish (brick piers will be cleaned). This will give the building a more contemporary feel.
- 6.53 With regards scale and massing, the proposed retail units would remain of the same height as the existing Homebase store. This building height is already accepted and integrated into the area. Further, the units will remain lower in height than many surrounding commercial and residential buildings – such as the four storey residential apartment block on the opposite side of Sturlas Way. Accordingly, it is clear that the scale and massing of the proposed retail units will be appropriate for their context.
- 6.54 The proposed scheme also takes into account the needs of crime and safety. For example, the customer entrance has a high degree of glazing which will offer unobstructed views into and out of the buildings and provide good natural surveillance. Customer cycle stands are located in front of the northern elevation where good natural surveillance is available from within the building, car park and Sturlas Way. Finally, the surface car park and external public spaces are generally open and provide good uninterrupted sight lines with clearly defined through routes and circulation. Overall, design measures have been incorporated into the scheme to limit the opportunities for crime, and to reduce the risk of crime, disorder and disturbance occurring.
- 6.55 Overall, it has been demonstrated that the design of the proposed refurbishment, extension and external alterations to the existing non-food retail unit (to create two retail units), will be of a contemporary design with a strong horizontal emphasis and will be constructed using modern methods and materials. The works will modernise and refresh the primary public facing elevations of the units in particular, giving the building a far more contemporary feel than at present. The design philosophy adopted, drawing upon a simple palate of quality materials, will ensure that the proposed development does not appear out of place in the context of surrounding land uses – in particular the other retail uses of the town centre. Furthermore, design measures have been incorporated into the scheme to limit the opportunities for crime. Compliance can therefore be demonstrated with policies DSC1, DSC5, DSC6 and DSC7 of the Local Plan and the design policies of relevance contained in the NPPF.

Ecology

- 6.56 Tyler Grange Ltd prepared an Ecological Assessment in support of the scheme and their report forms part of this planning application submission. The report establishes that the site is brownfield in nature and is located within an urban environment, fragmented from any areas of green space by roads and other infrastructure.

- 6.57 As part of the report, it is found that the site is not adjacent to or directly covering any designated sites and is considered to be sufficiently evaluated within the Local Plan HRA (2018) and Local Plan HRA Addendum on Proposed Main Modifications (2019), within which any likely significant effects on the three nearby European designated sites are scoped out.
- 6.58 The Ecological Assessment finds that the site itself contains no potential protected species habitat. The existing retail unit had negligible suitability for roosting bats and, as such, no further works are required in relation to roosting bats with respect to the renovation of the building.
- 6.59 Trees on the site were found to have a low suitability for bats. Notwithstanding this, only one is identified for removal as part of the scheme in any case (at the north-eastern corner of the site). The Ecology report recommends that should trees need to be removed as part of the proposals, then these should be soft-felled under the supervision of a suitably qualified Ecological Clerk of Works ('ECoW'). Soft-felling must occur only outside of the core bat hibernation season (November-March, inclusive) and will satisfy Policy NEB1 of the Local Plan.
- 6.60 With regards other wildlife anticipated to be present on the application site, the Ecological Appraisal finds that the land does have some limited potential to support breeding birds. Accordingly, the appraisal recommends that a bird nest check and reasonable avoidance measures should be employed if construction work is undertaken within the bird-breeding season (April -August).
- 6.61 The Ecological Assessment recommends that the site is enhanced for nesting birds and bats through providing bird and bat boxes within the scheme design and through installing such boxes on retained trees, thereby satisfying Policy NEB4 of the Local Plan. A native planting mix provided as part of a new landscaping scheme will offer a good supply of fruiting and nectar forage that will provide foraging opportunities for birds and bats both directly and through increasing the amount of insect forage available on-site.
- 6.62 The ecology report notes that baseline lighting levels on the site are already relatively high owing to its longstanding retail use. Therefore, no tangible impacts are predicted as a consequence of the scheme in terms of lighting. However, the report recommends that should any new lighting be provided then this should be sensitively designed, satisfying policy EQ3 of the Local Plan. In particular, any new lighting proposed along the southern boundary should be directed away from the tree line and should also avoid illuminating any newly installed bat boxes, if integrated into the scheme design.
- 6.63 The conclusion of the Ecological Assessment is that, subject to the implementation of the mitigation regarding breeding birds and bats described within the document, the proposed development would be in conformity with Policies NEB1 and NEB4 of the Local Plan and the relevant parts of the NPPF.

Flood Risk and Drainage Assessment

- 6.64 A Flood Risk Assessment ('FRA') compliant with the requirements set out in the NPPF has been prepared in support of the application. This confirms that the site itself lies wholly in Flood Zone 1 – lowest risk of flooding. Food retail development is classified as a 'Less Vulnerable' use within national flood risk vulnerability classification guidance.

- 6.65 The rereport concludes that the site is not in a flood plain and there are therefore no flood storage requirements. Also, as the proposed development does not increase the impermeable footprint of the site, there is no potential to increase in the existing flood risk beyond the site over and above the existing condition.
- 6.66 Accordingly, it can be robustly concluded that the development will not result in any undue risk of flooding and accords with Policy DSC1 (General Design), W4 (SuDS) and W5 (Flood Risk) of the Local Plan and the relevant requirements of the NPPF.

Overview

- 6.67 This section has clearly demonstrated that the application proposals meet the requirements of the relevant policies contained within the adopted Broxbourne Local Plan relating to: Waltham Cross town centre and its future retail uses, transport, noise, residential amenity, design and layout, ecology, flood risk and drainage, amongst others. This is as well as according with the relevant, corresponding policies contained within the NPPF and meeting the wider national policy objective of delivering sustainable economic growth.

7. Conclusion and Planning Balance

Overview of Proposals and Rationale

- 7.1 This Planning Statement has been prepared on behalf of Aldi Stores Ltd in support of a detailed application which seeks 'full' planning permission for the refurbishment, extension and external alterations to an existing 'Use Class E' non-food retail unit currently occupied by Homebase, to enable it to trade as part foodstore (Aldi) and part non-food retail unit (Homebase). Alongside works to the building itself, the scheme involves modifications to an existing external 'garden centre' (outdoor sales area), the current car parking layout, and other associated site works. The proposals are located at the existing Homebase unit on Sturlas Way, Waltham Cross.
- 7.2 The objective of the development proposals is to modify, refurbish and extend the existing non-food retail unit on Sturlas Way in order to enable joint occupation by both Aldi and Homebase. This will enable Aldi to make a positive investment within Waltham Cross town centre – a centre in which they have been seeking representation for many years – whilst retaining the home improvement retail offer of Homebase and the existing benefits this brings to the area. The reduced size of Homebase's unit will be more commensurate with their future business requirements and will safeguard the viability of their operation, with the retailer having been through a process of 'right-sizing' its portfolio over the past two years.
- 7.3 Given its town centre location, the site is both sustainably and accessibly located to the surrounding residential areas that it will serve. The introduction of Aldi in a 'gateway location' at the northern end of the high street will provide an important 'in-centre' convenience retail anchor for Waltham Cross town centre, which will help drive footfall and spin-off trade for existing local businesses, thereby enhancing the centre's overall 'vitality and viability' during what remains a challenging period for the retail sector.
- 7.4 The Aldi store will also create 40-50 quality full and part-time local jobs; delivering further indirect jobs through services supporting the new facility, and also providing a range of temporary construction jobs. This is in addition to the retention of existing local jobs at the Homebase store, which will otherwise likely be lost in time if the retailer is unable to sustainably downsize their current operation.
- 7.5 Alongside these retail choice, spin-off trade and job creation benefits, the scheme will offer the opportunity to notably improve the visual appearance of the site. This will be through the remodelling of the building itself, which will see extensive new glazing introduced to its northern elevation. The works will modernise and refresh the primary public facing elevations of the units in particular, giving the building a far more contemporary feel than at present. The scheme will also be carefully landscaped and in particular the proposals introduce new native shrub planting to the site's Sturlas Way boundary.

Policy Compliance

- 7.6 This Planning Statement has considered the application proposals against the relevant policies contained within Broxbourne's Local Plan, as well as other material considerations including national planning policy guidance. Specific consideration has been given to the site's allocation for mixed-use development under

Local Plan Policy WC2 and the other 'town centre use' policies contained within both local and national planning policy. These policies are considered to be the 'main planning issues' in this case. We summarise the applicant's conclusions in relation to each of these key matters below.

Principle of Retail Development

- 7.7 The existing Homebase unit and its associated car park lies wholly within Waltham Cross town centre, as defined on the policies map which accompanies the recently adopted Local Plan (June 2020). Accordingly, the site is classified as being 'in-centre' in the context of both local and national town centre policy guidance.
- 7.8 Section 6 of this Planning Statement therefore explains that the principle of providing a proportionately scaled discount foodstore on this 'in-centre' site is entirely consistent with the overarching objective of national planning policy, to promote the vitality and viability of our town centres.
- 7.9 The introduction of Aldi in a 'gateway location' at the northern end of the high street will provide a further, important 'in-centre' foodstore anchor for Waltham Cross town centre, complementing the existing Lidl foodstore at the southern end, and the centrally located Sainsbury's store. The store will drive footfall, promote linked shopping trips, and stimulate spin-off trade for existing local businesses, particularly those at the northern end of the high-street, thereby enhancing the centre's overall 'vitality and viability'.

Implications of Policy WC2 and its Long Term Aspirations for Mixed-use Development

- 7.10 Ordinarily, little more would need to be said regarding the acceptability of the principle of the proposed land use – given that a town centre location is evidently the most appropriate location for a foodstore and non-food unit in policy terms. However, in this case, Policy WC2 of the Local Plan is of relevance, which promotes the application site for future redevelopment as part of a new mixed-use quarter to be known as "*Waltham Cross Northern High Street*".
- 7.11 In terms of the implications of this site specific policy for the application proposals, it is acknowledged that the unit's refurbishment proposals do not seek to deliver residential-led, mixed-use development on the site, as sought by Policy WC2. However, nor do they preclude this from taking place at some point in the future when this is viable. Indeed, in our view (and as Section 6 of this report explains) all evidence suggests that the realisation of a comprehensive, residential-led, mixed-use scheme on the site is something that will only be achieved over the long-term and is unlikely to benefit from the necessary market demand / values over the course of the following decade.
- 7.12 This is owing to the fact that the town centre's residential-led re-development is intrinsically linked to Crossrail 2, and all signs point to this not now being realised over the plan period (to 2033) - as a consequence of the coronavirus pandemic and the project being put on hold indefinitely by TfL in late 2020. Notwithstanding this, even the Council's own Strategic Housing Land Availability Assessment (which dates back to June 2017) identified the site as only being an 'achievable' location for future residential development over a 11-15 year period.
- 7.13 In summary, we do not consider the application proposals to directly conflict with Policy WC2 of the Local Plan, in that modifying and re-using the site's existing retail unit does not preclude its long-term redevelopment

for the uses suggested in the Plan. It has clearly been demonstrated that the application proposals will offer a welcome boost to the 'vitality and viability' of Waltham Cross town centre over the short to medium-term, ensuring that the site does not fall vacant, and delivering a host of other benefits which have been outlined in Section 6. Should market demand for high-rise residential development increase as a consequence of Crossrail 2 being introduced in the future, then the option of the site's mixed-use redevelopment can still then be fully explored at that point, in-line with the Local Plan policy for the site.

Other Planning Policy Matters

- 7.14 Section 6 of this report has also clearly demonstrated that the application proposals meet the requirements of the other relevant policies contained within the adopted Broxbourne Local Plan relating to: transport, noise, residential amenity, design and layout, ecology, flood risk and drainage, amongst others. This is as well as according with the relevant, corresponding policies contained within the NPPF and meeting the wider national policy objective of delivering sustainable economic growth.

Overview, Benefits and Planning Balance

- 7.15 The NPPF 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 the adopted Broxbourne Local Plan and permission should therefore be granted. We do not consider the application proposals to directly conflict with Policy WC2 of the Local Plan, in that modifying and re-using the site's existing retail unit does not preclude its long-term redevelopment for the uses suggested in the Plan. That is the applicant's position.
- 7.16 Notwithstanding this robust conclusion, Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. Accordingly, even if the Local Planning Authority considers that the scheme would technically fail to fully 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.
- 7.17 Our report has identified a considerable number of very positive impacts that the proposed development will give rise to (reflective of NPPF, Paragraph 8). It is appropriate to weigh these material considerations in the planning balance as part of the determination of the application. This is particularly given that there is no 'policy harm' resulting in the site not being brought forward for mixed-use residential development at this point in time, with there being no evidence of the market demand or values necessary to viably realise this.
- 7.18 The key positive impacts can be summarised as follows:
- Given its town centre location, the application site is also both sustainably and accessibly located to the surrounding residential catchment that it will serve. The introduction of Aldi in a 'gateway location' at the northern end of the high street will provide a further, important 'in-centre' foodstore anchor for Waltham Cross town centre, complementing the existing Lidl foodstore at the southern end, and the centrally located Sainsbury's store.

- The introduction of an 'in-centre' Aldi foodstore will drive footfall, promote linked shopping trips, and stimulate spin-off trade for existing local businesses, particularly those at the northern end of the high-street, thereby enhancing the centre's overall 'vitality and viability' during what remains a challenging period for the retail sector.
- The introduction of Aldi will also enhance consumer choice in Waltham Cross' convenience retail sector, with the Council's Retail Study Addendum (June 2016) finding that both Lidl, High Street and Sainsbury's, The Pavilion Centre are 'overtrading' by a combined £13m (see Table 5, Appendix I, Retail Addendum). It is therefore quite clear that the town centre is in need of additional, appropriately sized foodstore competition and the application site is the only realistic opportunity to provide this.
- Aldi's investment will enable Homebase to viably 'right-size' their unit, making it more commensurate with their future business requirements, and allowing them to continue to serve Waltham Cross residents' home improvement needs. The reduced size of Homebase's unit will be more commensurate with their future business requirements and will safeguard the viability of their operation and local jobs.
- Aldi will create an additional 40-50 quality full and part-time jobs; delivering further indirect jobs through services supporting the new facility, and also providing a range of temporary construction jobs. The vast majority of positions will be made available to local people via targeted work with organisations such as Job Centre Plus. This is in addition to the retention of existing local jobs at the Homebase store, which will otherwise likely be lost in time if the retailer is unable to sustainably downsize their current operation.
- The proposal offers the guarantee of deliverable economic development within Waltham Cross by a national 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 in Bacup is anticipated to exceed several million pounds.
- The significant investment proposed by Aldi will provide the opportunity to improve the visual appearance and profile of a prominent 'gateway' site which currently suffers from a poor-quality environment and a lack of investment. The works will modernise and refresh the primary public facing elevations of the units in particular, giving the building a far more contemporary feel than at present – to the benefit of the wider town centre.
- Aldi's introduction will offer sustainability benefits, including the provision of two car parking spaces that are equipped with Electric Vehicle Charging Points ('EVCP'). Furthermore, below ground infrastructure will be put in place to add up to a further 20 EVCPs in the future – future proofing the Aldi foodstore in terms of this emerging mode of private travel. Aldi will provide electricity free of charge to customers whilst retaining the option to charge customers in the future.
- Finally, the introduction of Aldi will reduce health inequality in Waltham Cross, by providing straightforward access to a wide range of fresh produce and healthy food at heavily discounted prices. This is particularly relevant given that the alternative main food shopping destination is a considerably more expensive Sainsbury's foodstore.

7.19 Overall, it has been demonstrated that the proposed modification, refurbishment and extension of the existing non-food retail unit on Sturlas Way in order to enable joint occupation by both Aldi and Homebase accords with the key policies of the Broxbourne Local Plan, as well as the relevant policy tests contained within the NPPF. The applicant's position is therefore that planning permission should be granted on this basis.

7.20 Notwithstanding this, we have highlighted above that the application proposals will deliver some very significant positive benefits which weigh heavily in favour of the scheme. We consider that these benefits demonstrably outweigh any minor perceived negative impacts or policy conflicts that the Local Planning Authority may consider arise as a consequence of the foodstore development, particularly those associated with Policy WC2. The application proposals are therefore acceptable in planning terms and it is respectfully requested that planning permission is granted.

Contact Details

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