



ALDI STORES LIMITED

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Euan Donald
Clerk to the Local Government, Housing and Planning Committee
The Scottish Parliament
Edinburgh
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By email: Euan.Donald@parliament.scot

15 December 2022

Dear Mr Donald,

Revised Draft National Planning Framework 4

I write in respect of the revised draft National Planning Framework 4 (NPF4) which was laid in the Scottish Parliament on 8 November. This follows our previous engagement with the consultation process given our role as a major investor and employer in communities across Scotland. We have ambitions to expand our presence, helping to increase competition, lower prices for shoppers and in providing a more localised offer, improve the sustainability of shopping patterns. NPF4 will therefore have a significant bearing on our ability to deliver upon this.

As a responsible business, we recognise the contribution that is required from all to embed sustainability and have been highly proactive in this respect. Please refer to our previous submission for further details. We also recognise the need to help communities shop more locally and believe we can play a key role in meeting the overall aspirations of the NPF4 to establish 20-minute neighbourhoods. As operators of modestly scaled discount food-stores, designed to serve catchment populations of approximately 15,000 people, we are well-placed to support these ambitions.

Considering the above, we have taken a keen interest in the relevant retail policies contained within NPF4 and submitted a representation to the consultation process setting out our support for these policy aspirations, whilst seeking minor amendments to ensure that they appropriately reflect the varying needs of communities across Scotland.

We were pleased to note the amendments made, in particular the exceptions allowed under Policy 28-part c) that will permit, in the right circumstances, retail development beyond towns and city centres, where this "(i) contributes to local living, including where relevant 20-minute neighbourhoods and/ or (ii) can be demonstrated to contribute to the health and wellbeing of the local community." As set out in our original response to the consultation, these exceptions are important, particularly where such proposals can directly respond to localised needs and therefore, meet the overall aims of NPF4.

Notwithstanding this, we believe that part of Policy 28 remains unnecessarily prescriptive in its current form, in that the exceptions only allow for "*small scale neighbourhood*" retail development regardless of the scale of a community's needs.

In our submission, and to help deliver NPF4's ambitions, we suggest a minor amendment to Policy 28 part c) to replace "*small scale neighbourhood retail development*", with "***appropriately scaled retail development***". This would ensure that the policy could respond to the needs of each individual community across Scotland, whilst continuing to achieve the overall objectives of NPF4. It would also permit local authorities to evaluate the needs of their own communities, beyond the inflexible 10-year horizon for the preparation of Local Development Plans.



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To ensure local authorities are fully informed to make these decisions on an appropriate scale for development, the criterion already set out under Policy 27 at section b) ii) would logically be applied. These tests are routinely applied already by Councils across Scotland, under the current Scottish Planning Policy, and would ensure only those developments that are sustainably located, would be permitted.

Without these amendments, there is a substantial risk that we will not be able to continue our planned investment within Scotland. This would limit our ability to deliver new stores, preventing the creation of further well-paid jobs, stemming the growth of our investment in the Scottish supply chain and inhibiting our ability to offer sustainable shopping at affordable prices to a larger percentage of the population. For obvious reasons, we believe this would undermine many of the core objectives of NPF4 and must be addressed.

I hope the above is considered helpful to the Committee and afforded utmost importance. I would be happy to expand upon any of these points in more detail if that would be helpful.

Yours sincerely

Richard Holloway
Managing Director
Aldi Bathgate