



Response to Consultation on the General Principles of the Planning (Wales) Bill

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1. Introduction

- 1.1.1. Aldi welcomes this opportunity to provide its perspective to the Environment and Sustainability Committee on the general principles of the Planning (Wales) Bill.
- 1.1.2. Aldi has followed the development of the Planning (Wales) Bill closely and considered all of the general principles outlined in the call for evidence; however, this response seeks to highlight the key areas that Aldi feels would be of most significance to its future plans in Wales, namely:
 - The benefits of streamlining the development management system and how this might be achieved
 - The benefits of front-loading the development management system

1.2. *Aldi in Wales*

- 1.2.1. Aldi has an ambitious growth programme and is currently undertaking rapid expansion across the United Kingdom.
- 1.2.2. As part of this growth programme, Aldi is committed to greater expansion in Wales with plans to develop 20 new stores across the country by 2017, with subsequent proposals for a minimum of a further five stores to be delivered per year thereafter. Furthermore, Aldi's future operations in Wales will, hopefully, be supported through a new Regional Distribution Centre, which has recently received a resolution to see planning permission granted from the City of Cardiff Council.
- 1.2.3. A new Aldi store not only represents a multi-million pound investment in an area, but also brings associated benefits such as new employment opportunities, improved customer choice and increased local competition. The nature of Aldi's business model and in-store offer means that, unlike larger retailers, Aldi does not provide a 'one-stop-shop'. A visit to an Aldi store often forms part of a larger weekly shop and residents are encouraged to continue using existing local or independent businesses, thereby helping to deliver wider economic benefits through increased footfall and associated linked trips.
- 1.2.4. The desire to consolidate existing investment and plan its future expansion in Wales has come at a time when the normal barriers and hurdles to overcome as part of the existing Welsh planning system are being reviewed and addressed through this new policy. The direction in which the new Bill seeks to take the Welsh planning system is generally supported and will be promoted by Aldi and its consultancy team through all its dealings with the current system and during the transitional period.



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1.3. *'Culture change' in Welsh Planning*

- 1.3.1. Aldi applauds the general principles of the Bill and its use as a vehicle to deliver culture change within the Welsh planning system. From a commercial point of view, the desire to break down barriers between the developer and the local community and planning authority, the streamlining and sharing of resources, and the promotion of a more effective development management system, are all factors that can only help Wales to prosper economically. The principles set out in the Bill, and the prospect of a more coherent, streamlined planning process certainly makes Wales a country to target from Aldi's perspective.
- 1.3.2. Aldi is excited to be at the forefront of embracing these principles, and is grateful to have an opportunity to comment on the proposed changes to the operations of the Welsh planning system through this call for evidence.

2. Response to the call for evidence

- 2.1.1. Aldi is aware that productive and efficient engagement with local planning authorities (LPAs) at the outset of the process can improve the pre-application procedure and facilitate dialogue with relevant statutory bodies, key stakeholders, elected members and the local community.
- 2.1.2. Delays with provision of service and responses from statutory consultees can all have a detrimental effect on the planning process, cause unnecessary confusion and lack of certainty for local communities, and ultimately cost developers money that could otherwise have been invested into the local area.
- 2.1.3. As a result, Aldi welcomes proposals for the streamlining of the development management procedure and the enhanced emphasis on the frontloading of the application process through pre-application consultation and dialogue between the applicant and the local planning authority.

2.2. Streamlining the development management system

- 2.2.1. Reforming the development management system to streamline procedures and ensure that applications are dealt with promptly is an important principle of the bill and one that is very much welcomed by Aldi.



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2.3. Improvements to planning committees, delegation and the role of members

- 2.3.1. In Aldi's view, improvement to the current planning committee system and the role of members is central in achieving an effective decision making process. Aldi fully endorses community participation in the planning process and sees a democratically elected planning committee as a cornerstone of the planning system in Wales and the United Kingdom as a whole. However, an inconsistent decision making process, where there are vast differences in the size of planning committees, the level of resources, and the training available to planning committee members can all contribute to uncertainty and create an unnecessary delay that can sometimes affect how decisions are taken.
- 2.3.2. Aldi also wish to highlight the importance of seeing a consistent stance adopted among LPAs on direct applicant engagement with elected members. If beneficial working relationships are to be established, there should be a positive responsibility on each and every LPA to educate and, through this, encourage members to embrace opportunities to hold dialogue with applicants throughout the planning process.
- 2.3.3. Engagement with the local communities at the very outset of a planning application is central to Aldi's approach to its regional operations. Consistent dialogue with elected members throughout the pre-application and development process is beneficial to Aldi, as a developer, and the local authority and local community too. Increased understanding of planning procedures and wider planning issues would also provide more effective dialogue between local community representatives and the developer.
- 2.3.4. The move towards smaller, well trained committees with the necessary skills, knowledge and continuity of membership to make well informed decisions in a timely manner is of paramount importance to Aldi and its regional aspirations in Wales.
- 2.3.5. Aldi fully supports the proposed option of allowing Welsh Ministers to prescribe the size and the make-up of planning committees and strongly urges the adoption of this quorum for decision making in Wales.

2.4. Annual performance reports

- 2.4.1. The introduction of a common performance framework that sets out what a good local planning service should deliver and the requirement for each LPA to produce an annual report on service delivery will, in Aldi's view, be a fundamental driving force towards raising standards and assisting in the setting up of local processes and procedures that allow for efficient delivery of planning services. What must be made certain, however, is that these requirements do not allow a reduction in quality of service in order to meet the demands of the sheer quantity of applications to be processed.
- 2.4.2. Aldi would regard the incentivisation of LPA's with positive rewards for good service as a useful tool to help ensure standards are maintained. Any punitive measures taken for poorly performing LPA's should be constructive and not further hamper their ability to provide their planning services.



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2.4.3. Aldi would be keen to see the Welsh Government pledge to provide support for LPA's in this respect.

2.5. Requirement for Statutory Consultees to provide timely responses

2.5.1. Providing an efficient service with the necessary level of certainty and pragmatism at the pre-application stage is, at its heart, a question of time and resource management on behalf of the LPAs. Unfortunately, in this respect, LPA's are only as strong as their weakest – or slowest – link, and issues such as slow responses from statutory consultees can fundamentally affect the level of service that LPAs can provide to developers.

2.5.2. Aldi therefore welcomes the provision of a duty placed upon statutory consultees to provide substantive responses to consultation requests within a set time period, and for this to be recorded formally using performance reports. Furthermore, Aldi would recommend that in instances where statutory consultees do not respond, there should be a presumption of support.

2.6. Option for developers to submit 'major' applications directly to Ministers in poorly performing LPA's

2.6.1. Aldi supports the preferred option as set out in the Bill for allowing Welsh Ministers to designate poorly performing local authorities and to have applications submitted directly to Ministers for determination. This would help to streamline the planning system and allow Ministers to step in to areas where they feel that poorly performing authorities are undermining the potential to deliver growth and wider economic benefits.

2.7. Frontloading the development management process

2.7.1. In the same sense that streamlining the development management process aligns with Aldi's own aims of working with LPAs and elected members to bring about the most efficient and beneficial planning system in Wales, so too does the new proposed statutory requirements for frontloading the development management process.

2.7.2. Aldi has been a keen proponent of doing the 'leg work' up front and always aims to engage with local communities to ensure that current and future potential operations are working optimally for the local area. This requires early, open and honest engagement with local communities and elected members prior to the submission of a planning application and throughout its development.



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2.8. Statutory pre-application consultation requirement

- 2.8.1. Aldi therefore welcomes the proposed requirement for statutory pre-application consultation throughout Wales for 'major projects'. Although this new requirement will not change how Aldi prepares its planning applications, as this approach is already the company's adopted standard, it hopes that this new policy will encourage freer dialogue, especially with elected members within the its current or prospective operating areas.
- 2.8.2. It is Aldi's view that effective pre-application consultation and engagement with key community representatives is fundamental to a successful planning application. A local Aldi store can only achieve local support, patronage, and ongoing co-operation through an open and honest engagement and consultation programme right from the outset.
- 2.8.3. In fact, Aldi has taken its approach to local authority engagement one step further in an effort to aid understanding and to develop positive working relationships. In two particular LPAs where Aldi is seeking to develop new stores, early approaches have been made to senior representatives, both officers and members, seeking initial dialogue long before any potential applications are moved forward. This activity is based on a wish to understand LPA planning aspirations, potential target areas for future development and to ensure that there is clear understanding about Aldi as a business.
- 2.8.4. Aldi is hopeful that such an approach will help to foster positive working relationships and better understanding, which should ultimately deliver benefit when individual schemes enter the formal planning process.
- 2.8.5. It is in this area of pre application engagement in particular that Aldi hopes to see the required 'culture change' being taken fully to heart and the company will support, encourage and promote this aspect of the Bill in all its undertakings.

2.9. Pre-application advice from LPAs

- 2.9.1. Alongside the aspirations stated above, Aldi would also welcome the standardisation and review of the pre-application advice service from LPAs. The consolidation of a pre-application service in all LPAs will enable a coherent approach to planning right from the outset, with clear, defined rules and requirements for developers. The knowledge that consistent, informed dialogue would be achieved at this stage would be beneficial to Aldi when preparing its planning applications.
- 2.9.2. Aldi would hope that the fees to be charged for this service would be demonstrably re-invested within the planning departments that would be handling the applications. The capacity of and support for some LPAs at present is insufficient to allow them to provide the level of service required. Additional funding from this would help to address this lack of resources. In Aldi's view, this is a fundamental issue that needs to be addressed if the stated 'culture change' is to be achieved.



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3. The future – Potential barriers to the implementation of these provisions

3.1.1. Though Aldi is fundamentally supportive of the new direction for Welsh planning as outlined in the Planning Bill, the company would like to raise the point that the principles outlined are worthy but will not be deliverable unless they are fully supported by the Welsh Government and all component LPAs throughout Wales.

3.2. *Necessary funding and support for LPAs that often have to work to tight deadlines with reduced capacity*

3.2.1. In Aldi's experience, the key problem that arises when seeking to submit a planning application in Wales is that the LPAs have a real lack of resources. A dearth of experienced planners due to funding cuts and under capacity planning departments has been the root cause of the delays experienced by Aldi in Wales to date. The outsourcing of particular elements of work by LPAs to external consultants in order to help plug internal resource gaps can lead to delays.

3.2.2. Without the necessary financial support, LPAs will not be able to implement or achieve the majority of the principles outlined in the Bill as there simply will not be the manpower available to handle the number of applications in the manner now proposed. This problem is likely to worsen as Wales emerges from the recession and the economy and development continues to pick up pace.

3.2.3. Aldi's concern is that 'culture change' is very hard to promote when LPAs do not have the capacity or resources to respond to the amount of work it currently has, let alone manage change. Changing processes, systems, procedures and in some cases merging services will all cause an increase in workload in the short term.

3.2.4. Aldi therefore hopes that full recognition will be given by the Welsh Government to the imperative to see sufficient funding made available to support the delivery of the changes proposed. Coupled with funding is the need to ensure that attention is placed on ensuring that each and every LPA has the appropriate resources with the right skills base.

3.2.5. It is hoped that this new approach will make the future delivery of services more efficient and consistent but it is imperative that the transition phase is handled carefully, with full attention given to the needs of each LPA and the required support put in place to enable this culture change to happen.

4. Conclusion

4.1. Aldi's aspirations in line with the proposed changes

4.1.1. Aldi would like to conclude by highlighting that its regional and national aspirations are already in line with what the Bill aims to achieve. Aldi will support and promote the proposed policy through the continued application of its existing corporate policies and approach to expanding into Wales.