



Planning and Retail Statement

Bradley Road, Trowbridge

ALDI Stores Ltd

April 2026

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Report title: Planning and Retail Statement

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Date: April 2026

For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 Avison Young is instructed by ALDI Stores Ltd (ALDI) to prepare and submit a planning application for the extension of its store at Bradley Road in Trowbridge to provide an additional 277 sqm (gross) of floorspace. The proposals also include amendments to the car park which result in a reduction of parking spaces from 112 to 108.
- 1.2 The existing foodstore trades very well, but the customer shopping experience is compromised by its small size and lack of customer circulation space. In total, the proposals will result in an increase in floorspace as follows:

	GIA	Net Sales Area	Car Parking
Existing	1,396 sqm	936 sqm	112 spaces
Proposed	1,673 sqm	1,192 sqm	108 spaces
Difference	+277 sqm	+256 sqm	-4 spaces

Site and Surroundings

- 1.3 The application site extends to approximately 0.47 hectares. The site is located on the southern side of Trowbridge, approximately 1km to the southwest of the town centre. It is located on the western side of Bradley Road (the A363), opposite the junction of Bradley Road and Rutland Crescent.
- 1.4 The site is bound by housing in Yeoman Way and Arras Close to the north, by the A363 to the east, by the garden of 4 Bradley Road to the south, and by a footpath that connects Cavell Crescent and Yeoman Way to the west. The site is located in a mainly residential area, although there are other commercial uses along the A363.
- 1.5 The store is located in the southernmost part of the site with car parking with car parking in the central and northern parts of the site. The store is one of ALDI's earlier 'first generation' stores, although the northern elevation was extended in 2007 and now comprises of a triple pitched roof with a glass canopy that extends across about half of the length of the northern elevation, above the customer access points in the northeastern corner of the building. To the south of the site access and adjacent to the store's entrance point is a bank of large rocks set into block pavers.

Submission Documents

- 1.6 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 this Planning and Retail Statement assesses the development proposals against the relevant policies contained within the Development Plan as well as key national planning policies and all other relevant material considerations. The Statement also demonstrates the wider social, environmental and economic benefits of the scheme.
- 1.7 The application is accompanied by detailed Site Layout, Floorplans and Elevational drawings prepared by Kendall Kingscott, ALDI's architect. This Planning and Retail Statement should be read in conjunction with these drawings and the following documents which are submitted with the application:
- Arboricultural Impact Assessment (ref. BTC3505 Rev 2) prepared by Bowland Tree Consultancy
 - Design and Access Statement (ref. 250393-1500 Rev P01) prepared by Kendall Kingscott
 - Ecological Impact Assessment (ref. 18302-R0X-HW) prepared by Tyler Grange
 - Noise Impact Assessment (ref. 93618/NIA) prepared by Noise Solutions Limited

- Travel Plan (ref. TP1.0) prepared by Connect Consultants
- Transport Statement (ref. TS1.3) prepared by Connect Consultants

2. Planning History

2.1 Planning permission was granted for the construction of the existing store on 1 April 1997 under planning application reference W/97/00147/FUL. Various applications have been made since then under s.73 of the Town & Country Planning Act 1990 (as amended) to vary the original planning consent. We understand that the operative consent is decision notice reference 21/01955/VAR, which was approved on 25 June 2021.

2.2 We have summarised the planning history below.

Ref. No.	Description of Development	Status
W/97/01473/FUL	Erection of single storey food retail store and associated car parking	Approved 01/04/1997
W/97/00817/FUL	Amendment of condition 09 (W97/0147) to allow Saturday opening from 0830 to 1730	Approved 30/07/1997
W/06/02153/FUL	Extension to retail store, erection of glazed canopy and external alterations	Approved 04/12/2006
W/11/02860/S73	Variation of condition 5 of permission W/06/02153/FUL to facilitate deliveries between 07:00 to 19:00 Monday to Saturday and 10:00 to 16:00 on Sundays and Bank Holidays	Approved 01/02/2012
W/12/01397/S73	Amendment of condition 9 (W97/00147) to change opening hours to 0900 to 2100 Monday to Saturdays and 0830 to 1730 on Sundays and Bank Holidays	Approved 04/09/2012
21/01955/VAR	Variation of condition 2 of W/11/02860/S73 to allow extended delivery hours to between 06:00 – 22:00 Monday – Saturday and 08:00 – 17:00 on Sundays and Bank Holidays.	Approved 25/06/2021
PL/2022/07780	Variation of condition 1 (Delivery hours) of planning application 21/01955/VAR to permanently allow extended delivery hours to between 06:00 – 22:00 Monday – Saturday and 08:00 – 17:00 on Sundays and Bank Holidays.	Withdrawn 23/02/2023
PL/2023/04102	Variation of Condition 2 of W/11/02860/S73 to allow extended delivery hours for a temporary period of 1 year.	Withdrawn 14/08/2023

3. The Proposed Development

Overview of ALDI's Operational Model

- 3.1 ALDI operates as a 'deep-discount' or Limited Assortment Discount ("LAD") retailer. The term was defined by the Competition Commission in its Groceries Market Investigation Final Report in 2008 which said that LADs:

"carry a limited range of grocery products and base their retail offer on selling those products at very competitive prices. The three major LADs in the UK are ALDI, Lidl and Netto. Each ... carries in the region of 1,000 to 1,400 product lines in stores ranging from 500m² to 1,400m² (stores of a similar size operated by a large grocery retailer generally carry about 5,000 products). ALDI, in large part, carries only own label goods while both Lidl and Netto carry larger volumes of branded products."

- 3.2 Whilst dated in its references to typical floorspace and product lines, which have both increased, the characterisation of ALDI in the Commission's report remains wholly applicable in 2026, because it describes an operational model that remains fundamentally unchanged. Whilst ALDI's preferred trading format has evolved to a limited extent in relation to the product lines that are carried, and preferred floorspace requirements, those evolutions are neither material to the description given by the Competition Commission, nor do they reduce the differentiation between LADs and other food and convenience operators.
- 3.3 As per the characterisation of LADs in the Competition Commission's report, the trading floorspace within every ALDI store is consistent, and is currently at around 1,200 sqm to 1,400 sqm. This is to enable the range of identical products sold within each ALDI store to be arranged and displayed on a consistent basis in each store. Moreover, the gross floor area of new ALDI stores (i.e. the net sales area plus the 'back-of-house' area) varies only slightly from store to store, within a range of approximately 1,700 sqm to 2,000 sqm. The aim, again, is to ensure that all stores are built and operated to a consistent specification to facilitate efficient delivery and distribution of products to each store in the portfolio.
- 3.4 This essentially means that the number of core food product lines stocked within each ALDI store is identical and deliberately restricted to around 1,800 to 2,000. Whilst this has increased from the 1,000 to 1,400 referred to by the Commission, it remains in contrast to the 20,000 to 30,000 product lines typically sold in a superstore operated by one of the UK's 'mainstream' convenience retailers (Tesco, Sainsbury's, Asda, and Morrisons) so that the clear differentiation between LADs and those operators remains. This explains why all ALDI foodstores are of a uniform size, format and layout, which supports standardised product display, servicing and stock handling procedures, all of which serve to drive down operational costs.
- 3.5 The core retail offer within an ALDI store (which accounts for approximately 80% of the net sales area) replicates the most regularly purchased items within a family's weekly or 'main' food shopping trip. The vast majority of products stocked (circa 90%) are ALDI branded, compared with the 10-15% that may be stocked by the mainstream grocers. This avoids passing on the cost of brand name marketing to the consumer.
- 3.6 Moreover, because ALDI is concentrating on a limited number of product lines, which it stocks consistently throughout its portfolio of circa 990 stores, it is able to benefit from economies-of-scale so that its goods can be bought and sold at heavily discounted prices, without impacting upon quality.
- 3.7 ALDI's focus on the key products that typically make up a 'main' food shopping trip means that they do not sell certain ancillary lines normally found in mainstream supermarkets. In addition, there is no staffed butchery, fishmonger, bakery, 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, betting shop,

opticians, or photo processing. These factors are important when considering the trading effects of an ALDI foodstore because 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 much wider range of goods.

- 3.8 Notwithstanding the above, an ALDI foodstore, as with all modern supermarkets, will also stock a limited range of non-food goods. The range of non-food goods in an ALDI store is ancillary to the food offer in floorspace terms at approximately 20% of the net sales area. It is also significant that the products stocked mirror seasonal demand such that there is a constant variation in terms of range and choice, with no particular type of comparison goods predominating. For this reason the potential for an ALDI foodstore to compete with high-street retailers is extremely limited.

The Proposed Development

- 3.9 The proposed development seeks to align the Trowbridge foodstore more closely with ALDI's preferred operational model described above. Once extended, the store would have a gross internal area of 1,735 sqm, which is at the lower end of, but within, the range noted at paragraph 3.3 above. The net sales area will increase from 936 sqm to 1,192 sqm which is just about consistent with the lower end of the range set out in paragraph 3.3 above. The number of car parking spaces will reduce from 112 to 108 (which remains compliant with local maximum standards) and remains in accordance with ALDI's operational preference.
- 3.10 The following table sets out the difference between the existing and proposed gross floorspace, net sales area and car parking, when comparing ALDI's proposals with its existing store. It demonstrates that the proposal will meet the standard operational requirements of ALDI, whereas the existing store falls substantially short of those.

	GIA	Net Sales Area	Car Parking
Existing	1,396 sqm	936 sqm	112 spaces
Proposed	1,673 sqm	1,192 sqm	108 spaces
Difference	+277 sqm	+256 sqm	-4 spaces

- 3.11 The Proposed Site Layout Plan shows the extension to the northern elevation of the store and the re-organisation of the car park to accommodate the extension, HGV turning requirements, and adjustments to the number of EV Charging Spaces. Otherwise, the general layout and arrangement of the site and the foodstore remains unchanged.

4. The Development Plan

4.1 Section 38 of the Planning and Compulsory Purchase Act 2004 establishes that planning applications must be determined in accordance with the provisions of the Development Plan, unless material considerations indicate otherwise. Accordingly, in this Section we identify those policies which we believe are relevant to the determination of the planning application within the Development Plan which for Wiltshire comprises:

- The Wiltshire Core Strategy (adopted January 2015)
- The Wiltshire Housing Site Allocations Plan (adopted February 2020)
- The West Wiltshire District Plan Saved Policies

Wiltshire Core Strategy

4.2 The Core Strategy was adopted on 20 January 2015 and sets out the strategic vision for delivering sustainable growth over the period up to 2026. The Core Strategy is accompanied by a Policies Map. The **Policies Map** shows that the site is located within the Settlement Boundary for Trowbridge and is otherwise not subject to any specific allocations or designations. The Policies Map: **Inset Map 9 Trowbridge** defines the 'Commercial Area Boundary' and the 'Primary Retail Frontage' in the town centre, as well as areas of 'Local Shopping in Towns and Villages'. The site is not located within either of these designations and as such is 'out-of-centre' in retail policy terms but is, of course, an existing and established facility which has been trading for the past circa 28 years.

Spatial Strategy

4.3 Policy **CP1** sets out the Settlement Strategy for Wiltshire and identifies those settlements where sustainable development will take place. The hierarchy identifies Chippenham, Trowbridge, and Salisbury as the "Principal Settlements" within Wiltshire. It says that Principal Settlements are strategically important centres and the primary focus for development, providing significant levels of jobs and homes, supporting community facilities and meeting their economic potential in the most sustainable way.

4.4 Policy **CP2** sets out that within the defined limits of development at the Principle Settlements, there is a presumption in favour of sustainable development.

4.5 Policies **CP28**, **CP29** and **CP30** set out the Central Areas of Opportunity, define the Trowbridge Community Area and the spatial strategy for this area, and the Trowbridge low carbon and renewable energy network. In general terms, the policies give effect to the Settlement Strategy set out in Policy CP1, but add housing and employment land allocations at West Ashton Road and Ashton Park SUE.

Retail Policies

4.6 Policy **CP38** relates to retail and leisure. It says that all proposals for retail or leisure uses on sites not within a town centre and which are in excess of 200 sqm (gross) floorspace must be supported by an impact assessment which meets the requirement of national guidance and established best practice and demonstrates that the proposal will not harm the vitality or viability of any nearby centres.

Other Policies of Relevance

4.7 Policy **CP50** relates to biodiversity and geodiversity. It says that development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. It also outlines that all development should seek to enhance biodiversity across the site.

- 4.8 Policy **CP57** requires a high standard of design in all new development which amongst other things enhances local distinctiveness, retains and enhances existing important landscape and natural features, responds positively to existing townscape and landscape, is sympathetic to and conserves historic buildings and historic landscapes, maximises opportunities for sustainable construction techniques, has regard to the compatibility of adjoining buildings and uses and incorporates high standards of building materials, finishes and landscaping.
- 4.9 All such proposals must also comply with the sequential approach, as set out in national guidance, to ensure that development is on the most central site available.
- 4.10 Policy **CP60** requires new development to be sustainably located, whilst Policy **CP61** requires development to consider the needs of all transport users and demonstrate the proposal is capable of being served by safe access to the highway network.
- 4.11 Policy **CP67** relates to flood risk and requires all new development to include measures to reduce the rate of rainwater run-off and improve rainwater infiltration to soil and ground.

Wiltshire Housing Site Allocations

- 4.12 The Wiltshire Housing Site Allocations Plan was adopted in February 2020 with the purpose of revising settlement boundaries to support the allocation of new sites for housing to help the Council in demonstrating a five year housing land supply. As the Plan relates solely to the allocation of new sites for housing, none of which include the site subject of this application, the policies contained within this Plan are of no relevance to ALDI's proposals and therefore, we do not refer to this document again.

West Wiltshire District Plan (Saved Policies)

- 4.13 On 26 September 2007, the Secretary of State issued a direction setting out the policies within the West Wiltshire District Plan 1st Alteration that can be 'saved' beyond 26 September 2007. Policy **SP3** (Out of Centre Shopping) says that new and extensions to existing edge of centre and out of centre shopping developments, including superstores, supermarkets and retail warehouses, will only be permitted if all of the following criteria are met:
- a) There is a need for the development [albeit we note at this point that the demonstration of retail 'need' has not been a requirement of national planning policy relating to new retail development and town centres since the publication of PPS4 in 2009, and so this part of Policy SP3, which predates the NPPF is out-of-date];
 - b) There are no suitable and viable sites available within firstly, the defined Primary Retail Frontages and secondly, (for out of centre proposals) in edge of centre locations;
 - c) The development does not, either by itself or together with other retail developments, harm the vitality or viability of nearby centres;
 - d) The development is of acceptable scale, materials and design and does not harm the local environment or residential amenity;
 - e) The development is sited to reduce the number and length of car journeys and is accessible by a choice of means of transport, including by foot, bicycle and public transport;
 - f) The traffic generated by the proposal can be accommodated safely on the local highway network and sufficient car parking and servicing is provided.

5. Other Material Considerations

National Planning Policy Framework (December 2024)

- 5.1 The overall emphasis of the NPPF is to reiterate the Government's key objectives of facilitating economic growth and securing sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development. Town centre policies are dealt with at Section 7 of the NPPF under the title "*ensuring the vitality of town centres*". The sequential and impact tests are well known and are not repeated here.
- 5.2 Chapter 6 is focused on Building a Strong, Competitive Economy. It says that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Paragraph 85 says that "*significant*" weight should be placed on the need to support economic growth and productivity, taking into account both local and business needs and wider opportunities for development.

Planning Practice Guidance

- 5.3 The Planning Practice Guidance is an online resource that provides additional information and guidance in respect of how the NPPF and planning policies should be applied. In respect of the application of the sequential test, the 'Town centres and retail' guidance at paragraph 012 reads:

"Use of the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations. Robust justification will need to be provided where this is the case, and land ownership does not provide such a justification."

- 5.4 In this instance, we have noted that the proposals are an extension to an existing foodstore so that the proposals cannot be delivered elsewhere.

National Planning Policy Framework (2025 Draft Consultation Version)

- 5.5 On 16 December 2025 the Government published a revised NPPF and other proposed changes to the planning system for consultation until 10 March 2026. The revised NPPF proposes a fundamental rewrite of national planning policy. Whilst it is unknown when any new NPPF may come into effect, it is understood that the Government is keen to bring forward the revised NPPF quickly. Depending on timescales, it is therefore possible that Aldi's proposals could be determined in the context of the emerging NPPF.
- 5.6 The presumption in favour of sustainable development is currently a single presumption which refers to both the plan-making and decision-making functions of the planning system. The draft NPPF proposes to separate these out. In relation to the decision-making element the draft NPPF proposes three strands to the presumption which apply (a) where development is proposed inside a settlement where Policy S4 of the NPPF will apply; or (b) where development is proposed outside a settlement where Policy S5 of the NPPF will apply; and (c) in all locations, proposals that accord with an up-to-date development plan are expected to be approved without delay.
- 5.7 For proposals inside settlements, as per the site at Bradley Road, draft Policy S4 says that:
1. *Development proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects, when assessed against the national decision-making policies in this Framework."*

5.8 Draft Policy S4 sets a very positive framework for the consideration of applications inside settlements and contemplates refusal only where the benefits of granting permission are “*substantially*” outweighed by any adverse effects. It explains what that may mean and says that:

2. *In applying policy S4 the circumstances in which the benefits of approving development are likely to be substantially outweighed by adverse effects include (but are not restricted to) situations where the development proposal would:*

a. *Have an **unacceptable** [our emphasis] impact in relation to:*

i. *the allocation or safeguarding of land for particular uses in the development plan, unless there is no reasonable prospect of an application coming forward for the allocated use, or there is evidence that the safeguarding is no longer appropriate; or*

ii. *the application of the policies in this Framework for safeguarding existing open space, sport and recreation facilities (HC7), Local Green Space (HC8), designated wildlife habitats (N6) and for managing development within residential curtilages (L2); or*

b. *Involve the whole or partial loss of undeveloped land which is used for a cemetery or burial ground; or for water storage and/or flood risk management (unless suitable 23 compensatory provision is made which does not increase the risk of flooding either on or off-site); or*

c. *Fail to comply with one of the national decision-making policies which state that development proposals should be refused in specific circumstances.*

5.9 None of the circumstances in parts a (i), a (ii), b, or c are engaged in this instance, considering the site is already developed for a foodstore and the proposals under this application are for a modest extension to it. On this basis the scheme is one to which the proposed ‘permanent presumption’ would apply once the NPPF is published.

5.10 An important change relates to the weight to be attached to ‘Economic Benefits’. Paragraph 85 is proposed to be amended so that “*substantial*” (rather than “*significant*”) weight is to be attached in decision-making to the economic impacts of new “*commercial*” development. This upgrades the weight to be attached to economic benefits, and is much clearer in relating those economic impacts to any commercial use, which includes major retail use.

Emerging Local Plan

5.11 On 27 February 2026, the Inspectors appointed to examine the Wiltshire Local Plan 2020 – 2038 wrote to the Council, concluding that fundamental changes and new evidence is required to overcome concerns regarding the soundness of the Plan, and therefore recommended that the Council withdraws the Local Plan from the examination and addresses the Inspectors’ concerns through the preparation of a new Local Plan under the new Plan-making system. The decision whether to withdraw the Local Plan or seek an Inspector’s report will be made by elected Members at Cabinet and Council meetings in May 2026.

6. Retail Policy Considerations

Retail Impact

- 6.1 Paragraph 94 of the National Planning Policy Framework ('NPPF') requires that an impact assessment is submitted in support of planning applications for main town centre uses on sites outside town centres and not in accordance with an up-to-date Development Plan where the proposed floorspace is in excess of 2,500 sqm (gross) or any lower, locally set threshold. The impact assessment should include consideration of:
- a) 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,
 - b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment.
- 6.2 Policy CP 38 (Retail and Leisure) of the Wiltshire Core Strategy (2015) sets a lower local impact testing threshold of 200 sqm (gross) for retail developments in 'edge' or 'out-of-centre' locations. However, the policy also clarifies that the impact assessment required in support of a scheme should be proportionate to the scale of development. In this case, the scheme proposes only marginally more than the 200 sqm (gross) threshold in Policy CP38. The table below sets out the changes that will take place in relation to existing and proposed floorspace following the planned extension:

Table 1: Table Showing difference between Existing and Extended Aldi Foodstore

	GEA	GIA	Net Sales Area	Overall Shop Floor (including space behind tills for packing and customer toilets)
Existing	1,455 sqm	1,396 sqm	936 sqm	1,008 sqm
Proposed	1,735 sqm	1,673 sqm	1,192 sqm	1,285 sqm
Difference	+280 sqm	+277 sqm	+256 sqm	+277 sqm

- 6.3 As Table 1 shows the proposed increase in floorspace is modest. It will involve an additional 277 sqm (GIA) but only 256 sqm in relation to the increase in net sales area (which is of greatest relevance to the consideration of the potential for retail impact). Nonetheless because floorspace associated with a 'main town centre' use of more than 200 sqm (gross) is being proposed in an 'out-of-centre' location Policy CP 38 of the Wiltshire Core Strategy is engaged and requires that a retail impact justification is provided in support of the scheme.
- 6.4 It is also important to acknowledge also that Policy CP 38 states that the impact assessment should be 'proportionate' to the scale of development involved. Only a modest extension is planned to an existing and well established discount foodstore of only 77 sqm above the impact testing threshold (expressed in gross terms) in CP 38. It follows that the impact justification in this case need not draw upon a full and exhaustive quantitative retail impact assessment. Instead, a qualitative analysis focussing on the proposed extension's likely trading effects on the ALDI foodstore itself, on any nearby competitors, and on Trowbridge town centre is clearly a proportionate and robust response to Policy CP 38. This is set out in the following sections.
- 6.5 When interpreting national town centre policy concerning retail impact, it should be noted also that paragraph 95 of the NPPF states that where an application is likely to give rise to a "significant adverse impact" it should be refused. It is clear from this that any impact which is merely 'adverse' is not a direct reason for refusal and is capable of being weighed against positive social, economic, and environmental impacts in the overall planning balance.

Existing Trading Performance of Aldi Foodstore and Implications for Retail Impact

- 6.6 Wiltshire's latest Retail and Town Centres Study (Nov 2020) includes at Volume 2, Appendix II, a Quantitative Assessment which establishes amongst other matters the trading performance of Trowbridge's existing foodstores, including ALDI at Bradley Road. This is calculated by comparing the 'survey derived' convenience turnover of the foodstore with the 'benchmark' (or company average) convenience goods turnover in an equivalent test year. The findings, which are derived directly from the Council's Retail Study, are presented in Table 2 below:

Table 2: Table Showing Difference Between Aldi, Bradley Road, Trowbridge Survey Derived Convenience Good Turnover and Benchmark Convenience Goods Turnover (2020) (£m)

	Convenience Goods Survey Derived Turnover (2020) (£m)	Convenience Goods Benchmark Turnover (2020) (£m)	Difference (£m)
Aldi, Bradley Road, Trowbridge	£19.7m	£7.6m	+£12.1m

- 6.7 Table 2 shows that the existing ALDI foodstore achieves a survey derived convenience goods turnover of some £19.7m compared to an estimated 'benchmark' turnover of just £7.6m, based on Wiltshire's latest Retail Study. In other words, the foodstore is 'overtrading' to a considerable degree and achieves a turnover which is over £12m (or +160%) above that which would typically be expected for an Aldi foodstore of this size.
- 6.8 ALDI can endorse the findings of the Retail Study which reinforces the rationale behind the proposed floorspace extension. It will allow a greater depth (or higher volume) of the same product lines to be stocked in order to meet existing customer demand. On this basis the outcome of the extension will not necessarily be to increase the store's attraction or turnover but, instead, will enable it to better meet the needs and demands being placed upon it by the existing customer base. As such the effect of the extension will be to reduce 'overtrading' conditions in-store, and as a consequence a logical conclusion is that other shops and services in Trowbridge are very unlikely to be impacted upon in a material sense.
- 6.9 In summary, the latest Council Retail Study confirms that the ALDI's Trowbridge foodstore trades well above benchmark levels. ALDI can confirm that to be the case which is the primary reason for the extension that is proposed. The effect of providing additional sales space to stock a greater depth/amount of the same products would not be to materially increase the store's turnover, but instead will enable it to better meet the needs of, and cope with the demands being placed upon it by, the existing customer base. Accordingly, there are unlikely to be any material trading effects beyond the foodstore itself, and no prospect of any 'significant adverse' retail impacts.

Consideration of Wider Trading Effects

- 6.10 As explained in the above, the small extension proposed to the Aldi foodstore is not designed to increase the number of customers, but rather to provide an improved customer experience and increase the volume of existing products in order to meet consumer demand. Therefore, we do not believe that in reality there will be any wider trading effects associated with the scheme. Notwithstanding this, in the interests of robustness and transparency, the following section examines in a proportionate fashion the impact of the extension if it is hypothetically assumed that it will divert its trade from the wider Trowbridge area, rather than addressing overtrading in the existing foodstore.

- 6.11 Based on the proposed increase in net sales floorspace of 256 sqm, our calculations are that if the floorspace were to be used for the sale of convenience goods, it would achieve a turnover of just £2.8m¹. To put this figure into context, with the 2020 Retail Study finding that the existing Aldi foodstore has a convenience goods turnover of £19.7m, the turnover of the extension is equivalent to just 14% of the foodstore's current turnover. Accordingly, the impact potential of the extension is evidently low and our analysis reflects this accordingly.
- 6.12 In forecasting the trading effects that may arise as a consequence of the introduction of a modest extension to the store, it is important to have regard to the approach advocated within the Planning Practice Guidance. This confirms that a guiding principle is that 'like affects like' when it comes to the trading effects of a scheme (NPPG, Reference ID: 2b-015-20190722). Accordingly it stands to reason that new discount foodstore floorspace will divert most of its trade from equivalent surrounding mainstream and discount foodstores (to the extent that it is not simply addressing overtrading). This approach is entirely consistent with advice contained in the Practice Guidance.
- 6.13 In terms of the comparable mainstream facilities which are most likely to be affected in this particular case, it is significant that the site occupies a relatively central location in Trowbridge where there are a number of competing foodstores within a relatively short journey distance. For example, the out-of-centre Tesco Extra is the closest foodstore to the site at some 1km to the north-east. The in-centre Asda in Trowbridge town centre is 1.1km to the north, whilst the edge-of-centre Sainsbury's is 1.3km to the north-east. Finally, the out-of-centre Lidl foodstore is 2km north-east on the northern side of Trowbridge town centre.
- 6.14 In following the Practice Guidance 'like-affects-like' principle it stands to reason that the majority of the turnover of additional convenience goods floorspace on the application site (to the extent that is not simply addressing overtrading) will be diverted from these immediately surrounding, competing, mainstream facilities. This is in view of the fact that these operators are nearby and will appeal to a comparable catchment and customer base.
- 6.15 The table below presents a high-level trade diversion analysis, which shows in broad terms the quantitative impact of the extension floorspace on surrounding competing foodstores. As a proportionate approach has been adopted, we have drawn directly from the Wiltshire Retail Study for the purposes of this analysis.

Foodstore	Convenience Goods Survey Derived Turnover (2020) (£m)	Diversion to Aldi Foodstore (% / £m)		Trading Impact (%)
Tesco Extra, County Way, Trowbridge (out-of-centre)	£53.7	50%	£1.40m	-2.6%
Asda, The Shires Centre, Trowbridge (in-centre)	£21.8	15%	£0.42m	-1.9%
Sainsbury's Superstore, British Row, Trowbridge (edge of centre)	£32.2	15%	£0.42m	-1.3%
Lidl, Canal Road, Trowbridge (out of centre)	£11.4	20%	£0.56m	-4.9%
Total	-	100%	£2.80m	-

¹ For consistency with the wider analysis, we have calculated the extension's convenience goods turnover by utilising the Aldi sales density contained within the Wiltshire Retail Study 2020. If the latest Aldi sales density is utilised from GlobalData 2025 Edition and re-based to 2018 prices, then the sales density is lower than the figure contained within the Retail Study. Accordingly, using the Retail Study sales density evidently represents a 'worst case' scenario and is therefore robust.

- 6.16 The above table logically assumes that the greatest trade diversion will be from Tesco, given that this is both the closest competing foodstore and the most popular foodstore in the Trowbridge area according to the 2020 Wiltshire Retail Study. However, even if up to 50% of the extension floorspace turnover was diverted from Tesco this would result in an impact of just -2.6%. This would evidently have little bearing on its overall performance.
- 6.17 The next greatest diversion (20% of extension turnover) has been assumed from Lidl, given that this is the closest competing discount foodstore. Whilst this diversion would result in an impact of -4.9%, the Lidl foodstore was found by the 2020 Retail Study to be performing above benchmark levels (or 'overtrading') by some +£2m. There would therefore be no consequence for its future viability.
- 6.18 Finally, it has been assumed that 15% (£0.42m) of the extension's turnover will be diverted from Trowbridge's Asda and Sainsbury's superstores respectively. Whilst it is acknowledged that Asda is an 'in-centre' foodstore and Sainsbury's is 'edge-of-centre', the above tables show that in both cases the forecast trading impact would be less than -2%. An impact of this magnitude would have no material bearing on the long-term viability of either of these much larger foodstores.
- 6.19 With the exception of Asda Trowbridge, none of the other foodstores identified are 'in-centre' in town centre policy terms and therefore do not benefit from town centre policy 'protection' as articulated in Section 7 of the NPPF (December 2024). Any trading impact upon them as a consequence of the modest floorspace extension proposed is not therefore of consequence from a decision-making perspective. Notwithstanding this, the above table has demonstrated that anticipated impacts will be very low level given the modest amount of floorspace proposed.
- 6.20 In summary, given the existence of immediately surrounding mainstream out-of-centre competition from which the vast majority of the extension's trade will inevitably be diverted, it stands to reason that residual trade diversions from defined centres such as Trowbridge will be extremely limited in this case. Notwithstanding this, we have undertaken a proportionate analysis of the anticipated trading effects of the proposals on Trowbridge town centre in the section below. In undertaking this exercise, the implications of any minor residual impacts associated with the extension floorspace on town centre 'vitality and viability' can be fully understood.

Impact on Trowbridge Town Centre

- 6.21 The 2020 Retail Study finds that Trowbridge town centre is one of the most popular retail destinations in Wiltshire. According to the latest Experian GOAD data (June 2025) the centre contains some 320 units which provide in the order of 70,000 sqm of floorspace. The town centre is anchored by both the Shires Shopping Centre (containing 50 units) and the more modern 'The Gateway' retail development which provides 6 large-format retail units. National multiple retailers within the town centre include Boots, Clarks, O2, Superdrug, Waterstones, Next, Sports Direct, WH Smiths and JD, amongst others. The centre also benefits from a large anchor foodstore in the form of a centrally located Asda superstore.
- 6.22 Parts of the town centre benefit from being pedestrianised and it also contains a variety of non-retail uses which attract visitors, including a cinema, bars and restaurants at the St Stephen's Place development. The centre also contains Wiltshire Council's offices, which brings both visitors and employees to the town centre on a daily basis. Accessibility is strong via all modes, as would be expected for a centre of this scale, with both a train station and regular bus services. There are also a vast number of public car parking spaces serving the town centre.
- 6.23 Turning to the scheme's potential trading effects on Trowbridge, the total floorspace proposed as part of the planning application (some 277sqm) would equate to less than one percent of the total floorspace contained within the town centre (according to Experian GOAD data). Furthermore, it is clear that Trowbridge has a wide-ranging offer which is focussed more on comparison goods retailing, leisure and service uses than it is on convenience goods floorspace. The reality is therefore that any trading impact of the scheme on Trowbridge town centre as a

whole will be imperceptible given the very considerable difference in size. In addition, we have highlighted that the vast majority of the scheme's trade will be diverted from surrounding out-of-centre facilities, rather than the town centre.

- 6.24 Accordingly, it is clear that the introduction of a modest extension to the existing ALDI foodstore on the application site will not have any bearing on the 'vitality and viability' already enjoyed by Trowbridge town centre. The centre is much larger than the proposal and is evidently successfully performing its strategic role within the local retail hierarchy, as evidenced by the conclusions of the health check contained within the 2020 Wiltshire Retail Study. For the reasons given, this role will not change following a small extension to Trowbridge's Aldi foodstore.

Overall Conclusion – Retail Impact Matters

- 6.25 Given ALDI's increased popularity over the past decade or so, their model has changed and additional space is now required to accommodate their full range of products at an increased volume – as expected by their customer base. The principle of retail development is already long-established on the application site, and the proposed extension represents an incremental improvement which is required only to modernise the foodstore and address issues associated with 'overtrading', such as store congestion and insufficient product space.
- 6.26 It has been explained that the floorspace extension would be just 77sqm above the Council's defined retail impact testing threshold and, in line with local planning policy, the impact justification only needs to be proportionate to this minor exceedance of the threshold.
- 6.27 We have highlighted that the latest Council Retail Study finds that the Aldi's Trowbridge foodstore trades well above benchmark levels and Aldi can also confirm that the foodstore is 'overtrading'. The effect of providing additional sales space to stock a greater amount of the same products would not be to increase the store's turnover, but instead to enable it to better cope with the demands being placed upon it by the existing customer base. Accordingly, there are unlikely to be any material trading effects beyond the foodstore itself.
- 6.28 Notwithstanding this, we have carried out a high-level trade diversion analysis, which shows in broad terms the quantitative impact of the extension floorspace on surrounding competing foodstores, if it is hypothetically assumed that the new space will divert its trade from the wider Trowbridge area, rather than addressing overtrading in the existing foodstore (which is the likely outcome).
- 6.29 Finally, we have also undertaken a proportionate assessment of the scheme's impact on Trowbridge town centre itself. This has demonstrated that a modest extension to the ALDI foodstore will not have any bearing on the 'vitality and viability' already enjoyed by the centre. Trowbridge town centre is much larger than the proposal and is evidently successfully performing its strategic role within the local retail hierarchy, as evidenced by the conclusions of the health check contained within the 2020 Wiltshire Retail Study.
- 6.30 Drawing all of the impact analysis set out within this section of the report together, it is clear that there will be no conflict with Paragraph 94 of the NPPF, and the scheme is also considered to accord fully with the local retail impact test set out in Policy CP 38 ('Retail and Leisure') of the Wiltshire Core Strategy (January 2015). Retail impact should not therefore be a reason to withhold planning permission for this scheme.

The Sequential Test

- 6.31 The sequential test is engaged but must be applied on the basis that the proposed extension would not be provided elsewhere and that the PPG acknowledges the principle that some proposals are genuinely 'location specific' such that they cannot be located within a centre and with the sequential test to be applied on that basis.

That is the case here and so we conclude logically that the sequential test is to be applied according to the references in the PPG, and that the test is met.

7. Design, Technical and Environmental Considerations

Economy

- 7.1 ALDI stores generally employ between 40 and 50 staff. Whilst this is not a new store, ALDI's store extensions will typically support up to 10 new jobs in addition to existing staffing levels. 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.
- 7.2 ALDI ensures that its foodstores 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.
- 7.3 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. The proposals will also include some temporary jobs during the construction phase. On this basis the proposals will deliver some additional employment benefits attracting positive weight

Design

- 7.4 The design of the extension in terms of its height and scale is consistent with the existing foodstore. Similar materials are proposed, localised views into and across the site will remain largely unchanged, and there will be no overbearing visual or other impact caused to neighbouring properties

Transport Matters

- 7.5 A Transport Statement has been prepared by Connect Consultants. It has been conservatively assumed that the extension to the store will generate a 10% increase in vehicular trips to the store. The resultant uplift in two-way trips has been calculated to be 8 in the morning peak, 23 in the afternoon peak, and 20 at midday on Saturday. This uplift is considered to be negligible and in any event not material to the safe and efficient operation of the existing access (which is unchanged) or the wider highway network.
- 7.6 The proposed development results in the loss of 4 car parking spaces. Connect has provided data from ALDI's automatic number plate recognition system and extrapolated this to calculate the utilisation of the car park throughout the day. The data shows that the car park is never more than 49% full so that the limited reduction in the number of spaces will not lead to any risk of off-site parking.
- 7.7 The Council's adopted car parking standards require a maximum of 1 space per 15.4 sqm of retail floorspace. Based on the total floorspace of the store increasing under this application, this equates to a maximum of 109 spaces so that the provision of 108 spaces is compliant with the Standards.
- 7.8 The development is therefore expected to have a 'de-minimis' impact on traffic and therefore compliant with Policies CP60 and CP61 of the Core Strategy.

Servicing/Delivery and Plant

- 7.9 There are changes proposed to the servicing arrangements for HGV as a consequence of the extension, although there is no change to the principle of HGV servicing being via a loading bay and ramp, ensuring that all servicing is undertaken within the store so as to limit noise impacts on amenity.
- 7.10 The changes to servicing do mean that there is a need to remove four trees and a small area of landscape planting (circa 23 sqm) so as to accommodate the tracking of HGVs back onto the loading bay. ALDI has sought to avoid any tree removals but that has not been possible. The implications of this from an arboricultural and ecological perspective are considered below based on work undertaken by Tyler Grange.
- 7.11 There are also some changes proposed to the type and location of building plant which are shown on the submitted drawings and are considered in the Noise Assessment (prepared by NSL) submitted with this application. The Noise Assessment recommends that a 2.3m high acoustic fence is erected to the southwestern elevation of the plant area to the rear of the store and absorptive acoustic wall lining installed to the building's southern elevation to mitigate the new air source heat pumps being installed. With this mitigation, NSL has advised that the proposed development will not give rise to any adverse impacts to residential amenity.

Ecology

- 7.12 Tyler Grange has prepared an Ecological Impact Assessment, which concludes that the development proposals will primarily affect habitats of negligible ecological importance. Whilst four trees are being removed as part of the proposals, these trees have been assessed to be of low quality with limited ecological importance. The assessment therefore has not identified any protected or notable species on site, or any features which could provide suitable habitat to protected species.

Arboriculture

- 7.13 Bowland Tree Consultancy has prepared an Arboricultural Impact Assessment. Whilst the proposals have sought to retain as many trees as possible, the car park has been re-orientated to facilitate the extension, and as a result, four trees necessarily have to be removed to enable service and delivery vehicles to safely manoeuvre within the site. Bowland has surveyed the trees and considers all trees across the site, including those proposed for removal, to be of low quality.

Flood Risk and Drainage

- 7.14 The Environment Agency's Flood Map for Planning shows the site as being within flood zone 1 and therefore at low risk of fluvial flooding. When applying the 1 in 100 year annual likelihood of flooding, there is some risk of surface water flooding to the rear of the store along the site's southern boundary and to the delivery bay on the store's western side.
- 7.15 As the proposed extension to the store will be built on part of the site that is hardstanding, is not located in the parts of the site at risk of flooding from surface water sources, and will utilise the existing drainage measures, we consider that the proposed development will not give rise to any increased risk of flooding at the site or elsewhere. We consider the proposals accord with Policy CP67 of the Core Strategy.

Community Infrastructure Levy

- 7.16 Wiltshire is an authority that charges Community Infrastructure Levy ("CIL"). Its Charging Schedule came into effect in May 2015, which sets out the types of development within the County. The Charging Schedule sets out that the generation of any supermarket floorspace will be charged at £175 per square metre.

8. Summary and Conclusions

- 8.1 This Planning and Retail Statement has been prepared in support of an application for full planning permission for the extension and alterations to the car park at ALDI's Class E foodstore at Bradley Road, Trowbridge.
- 8.2 The site currently comprises the operational foodstore. ALDI's proposals seek to extend the foodstore by 277 sqm (GIA), with an increase in the net sales area of 256 sqm. The extension is modern, with clean lines and materials, and of a scale and appearance that is in keeping with the design of the existing building. To facilitate the extension, the car park has been re-orientated to allow service vehicles to manoeuvre within the site. This will result in a loss of four parking spaces.
- 8.3 In respect of retail policy and the sequential test, we have concluded that the proposals are for an extension to an existing foodstore and that the sequential test is appropriately applied on the basis that the proposals are location-specific (i.e. they can only be delivered in this location because they are an extension) . This is in accordance with the approach set out in the PPG.
- 8.4 In respect of retail impact, the extension is just 77 sqm above the Council's defined retail impact testing threshold. The proportionate analysis into trade diversion shows that the modest level of new floorspace proposed, the trade diversion from defined centres will be extremely limited, and will have no bearing on the vitality and viability of Trowbridge town centre.
- 8.5 Finally, the broader submissions confirm that the proposal is for a well-designed extension to an existing store and that there are no technical or environmental constraints that would restrict or prohibit development on the application site.
- 8.6 Having regard to the lack of conflict with the relevant policies of the development plan, and the compliance of the proposals with relevant policy in the NPPF, together with the lack of technical, environmental or amenity based reasons why the development may not proceed, the proposals are for sustainable development to which the presumption in the NPPF apply.

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