

19<sup>th</sup> August 2022

Dear Kim and Anne

### **Proposals for an Aldi, West Norwood**

Aldi would like to thank you for attending our public exhibitions and for providing comments to our proposals in your letter of 6<sup>th</sup> August 2022. In response to your letter, we have reviewed the joint comments received and for ease of reference have subdivided the topics as follows:

#### **Viability**

We recognise that the site's current Development Plan allocation and preference for 'KIBA' uses is a key issue. In this respect, we acknowledge that retail use is not the policy preference. Our decision to proceed with our application has not been taken lightly and we would not be pursuing the proposals if we did not believe there is a genuine and robust case to present, including on viability grounds.

We have appointed leading experts in this field, SQW Land & Property, to undertake an appraisal to consider the viability of delivering the most basic (i.e., most cost-efficient) level of KIBA compliant use on the site. It should be noted that the scheme we appraised was one that Lambeth Council indicated would potentially have 'in principle support'.

Our appraisal has been prepared in accordance with best practice planning guidance and concludes that there is a "*...strong viability argument that light industrial development is barely viable in and of itself and certainly would struggle to overcome the existing use value of the site*". This will form part of the planning application and will be subject of independent review and scrutiny. We will be happy to share this as appropriate with the NAG and Norwood Forum also.

Nevertheless, notwithstanding and without prejudice to this position, we are also seeking to offer a level of compromise in this respect through the mixed-use development being proposed, which will secure provision of compliant floorspace.

#### **Business workspace**

We are committed to providing an element of KIBA space within the site at the first floor but want to be sure that the potential use is not so restrictive that it is unattractive for potential tenants. The KIBA advice is quite broad as to what would be acceptable under the designation of KIBA and so at this early stage we wanted to present the space and ask for local stakeholders to suggest potential uses. Otherwise, we would be keen to provide a space which would be of interest to light industrial businesses, such as light manufacture (for example silversmithing, woodcraft, or printmaking etc). Of most importance to all parties is that a deliverable development is secured to finally bring the site back into beneficial use.

Given the adjacent established and locally listed residential buildings, as well as being respectful to surrounding residential uses, we are reluctant to add additional massing. We feel that the proposals allow sufficient space for small light industrial use whilst also allowing for the building appearance to be manipulated to articulate the proposed facades and provide a complementary aesthetic alongside the locally listed residential properties.

As noted, we have endeavoured to provide an element of 'compliant' space, which we believe is a mutually beneficial part of the development. To be clear; Aldi are committed to delivering this floorspace and will volunteer not to open the store until this has been provided. This means that all parties have full comfort that the site will deliver local employment floorspace and will finally contribute to the local economy after lying vacant for many years.

We are also intending to apply for this on as flexible a basis as possible to ensure that it is fully accessible to local businesses. We will commit to working with third parties, including Lambeth Council and relevant local employment stakeholders, to promote and manage this space.

### **Traffic Management**

We have undertaken a speed survey on Knights Hill which recorded speeds over a one-week period. The speed data has been used to inform the design of the site access junction. The design will be subject to an independent road safety audit, and future iterations of the design will take account of matters (if any) which may be raised by the safety audit. The width of the access has been designed to minimise the pedestrian crossing width and it is proposed to include paving which emphasises the priority for pedestrians. If the site is developed for a KIBA use the most likely access position is also on Knights Hill.

The radii of the access are suitably designed to facilitate access by a vehicle larger than a car but the access itself is 7m wide at the narrowest part, less than would be expected for a fully light industrial use at 7.3m to 8.5m wide minimum. The detail of the access design is for a raised brick pedestrian platform to give priority to pedestrians which is a detail proven to work in similar situations elsewhere.

Historically the access for the former school on the site was off Knights Hill in approximately the same location as we are proposing and there was no vehicular access from Chapel Road. Also given the levels on site, the restricted width of Chapel Road and the current residential parking, it is felt that Knights Hill is the only option for vehicular access to the site for any proposed development. This will be tested, and a report of the assessment provided as part of the application.

### **Car Parking**

The Aldi store is very much aimed at local people, some of whom will need to drive to the store to transport their shopping home. The parking provision needs to be carefully balanced to ensure that the maximum number of local people can benefit from having a closer and more convenient store, but without encouraging car use. The proposed parking considers both parking standards and operational needs and will include suitable allocations for disabled, parent with child, and EV charging. We are not aware of any intention to provide a CPZ, and the aim is for Aldi's parking to be self-contained.

Following the Public Consultation, we are looking at increasing the EV charge spaces and providing a number of passive charge spaces for future implementation. Any highways works will need to be implemented under the strict dictation of the Highways Authority and it is not within our remit to suggest that a CPZ on Chapel Road be implemented as part of our application.

### **Cycle parking**

The proposals will provide a suitable quantity of cycle parking which is located to facilitate easy access by cycle. Following the Public Consultation, we are looking into increasing the cycle parking provision on site and splitting it to allow cyclists arriving from different points to have access. We are also providing an element of adaptable cycle parking.

From our experience of Aldi car parks, for the majority of the day the utilisation by vehicles is generally light and navigation by pedestrians and cycles would be appropriate. However, if this is an issue then a further pedestrian access point and cycle hub is provided along Chapel Road.

### **Access**

Pedestrians and cyclists are encouraged to enter the site via Chapel Road. We have created a hub area alongside the lobby where levels align with the site providing trolleys and secure covered cycle bays in close proximity to the entrance.

### **Loss of Amenity – noise**

The proposed format for deliveries to the store is the same used at almost all Aldi stores: the delivery truck phones ahead, and an employee goes out to direct manoeuvres. Reversing beepers are turned off when required and once the vehicle is in position against the building, it is surrounded by a dampening shroud. Refrigeration units are turned off, to prevent noise from travelling. Deliveries are via a ramp and dock leveller, so goods prepacked on pallets come directly out of the vehicle into the store via a pallet truck (no rattling cages) and then either into the store or into the lift and up to the first-floor warehouse. Timing of the deliveries will be dependent on the Local Authority but, will not be 24hr and unlike most large stores we expect only two 13.2m long delivery

vehicles a day. We do not normally secure our car parks at night unless there is an issue with unauthorised access.

### **Loss of Amenity – visual**

The site is a transition between commercial and residential. Our development, including its uses and architecture, reflects this. The design ethos of the building is to be in keeping with the KIBA light industrial designation of the land but will use materials, such as white render and brickwork, which sit well in a domestic context. The design aesthetic is for modern crisp clean lines and broken massing.

### **Impact on existing local businesses**

Overall, the proposals will have a positive impact to the local area. In respect of Aldi, it is important to understand the nature of the offer and if anyone is not familiar with our stores, we would urge them to visit. Aldi primarily serve a bulk shopping offer, where people do their 'weekly shop'. In many ways the store offer is fairly 'basic' as the majority of products are own branded and there are no in-house concessions, such as butcher, deli, kiosk, pharmacy, café etc. The result is that Aldi is not a one-stop-shop as customers also need to visit other shops and services to fulfil their shopping needs. The result is a complementary offer and not competing on a like for like basis, especially with smaller independent shops and services.

Further, the store will also provide an amenity in this respect. There is no comparable like for like store in West Norwood and it will be something different in this respect, being accessible to both local residents and staff at other businesses.

The additional KIBA floorspace will be a further benefit to local provision in the area and through the joint promotion of this will be a significant net gain to the local stock of space.

Finally, the regeneration of the site and significant visual enhancement that will be delivered through the landmark building will greatly enhance the profile of the site and surrounding area and could well act as a catalyst for other investment in existing buildings.

### **Natural Environment:**

The mature trees on site have been assessed and most have been identified as self-seeded trees which as such do not necessarily have the best situation to allow them to grow to their full potential in a healthy way. There are four trees under a TPO on site and two of these are very unhealthy, damaged and should be removed to not cause any danger. For a viable scheme, the whole of the site needs to be incorporated and where possible we are proposing well-spaced semi-mature native trees to ensure that the trees can grow to their full potential in a healthy environment. Levels within the site are varied. As part of the application, we have decided to provide further mitigating measures to the loss of green space by working with the council to provide planting on an alternative site.

The store is proposed to have a brown roof and PV panels. The site will be assessed for its suitability for a SUDS scheme and an appropriate site-specific drainage scheme will be produced.

### **Local impact**

Aldi prefers to employ local people in their stores as they like their staff to have an understanding of the area in which they work. They also generally go to local suppliers for items such as milk etc. During construction, works tend to be tendered to local companies.

### **Neighbouring Yellow Box site**

This site is allocated for KIBA industrial use, not as an open space facility or orchard. It is not economically viable and would be legally complicated to locate the sub-station on another site. As previously stated, the intention is to plant semi-mature trees on site with enough room for them to grow in a healthy manner.

### **Packaged goods**

Plastic packaging plays an important role in protecting products from damage, making sure that they can be transported easily, and helps reduce waste by preserving food for longer. However, we are aware of the negative impact that plastic has on the environment and know this is an issue that matters to our customers, which is why Aldi has committed to reduce, reuse, and recycle 100% of our packaging, have 150% reduction in plastic by

2025, reduce packaging by 150% by 2025, by the same year increase by 150% recycled plastic content and increase loose refillable and reuse sales year on year.

As proud members of the UK Plastics Pact, our Buying and Plastic & Packaging teams have been working together to review our entire product range and have taken positive steps to reduce the amount of plastic and packaging we use.

For example, all of Aldi's back-of-store plastic waste is recycled and turned into our bags for life. The bags are made from 100% recycled plastic and can be reused, then recycled again.

I hope this response is helpful. Please don't hesitate to get in touch if you have any questions or comments.

Best wishes,

The Aldi West Norwood Project Team