

Agnieszka Nowak-John
Principal Planner – Major Developments
Housing, Planning and Regeneration Services
London Borough of Bromley Council
Stockwell Close
Bromley
BR1 3UH

By email only: Agnieszka.Nowak@bromley.gov.uk

22 February 2022

Our Ref: 3574

Dear Agnieszka,

Planning Application 20/04838/FULL1 – Proposed Aldi Foodstore, Farnborough Way

Further to ongoing discussions, we write on behalf of my client, Aldi Stores Ltd. (Aldi), in respect of the above application. This letter provides a comprehensive update on the latest position and changes made to the scheme following the resolution to defer at the Bromley Development Control Committee on 1st December 2021.

As part of this, we also provide a response to any matters arising from the latest round of consultation, which expired on 9th February 2022.

Background & Latest Position

As Officers are aware, the application was heard at Committee on 1st December 2021, where following considerable debate, members resolved for determination to be deferred to enable *“further work to be carried out on the design, materials, bulk and landscaping of the proposal”*. To confirm, this was the only outstanding matter to be addressed following committee.

Following committee and in response to the specific reasons for deferral, significant changes have been made to the design of the store. Following discussions with officers, updated plans were submitted on 25th January 2022, alongside a comprehensive Design Document setting out rationale for changes made. This was subject to a 14-day consultation period, ending on 9th February 2022 and during which we note there has been further interest in the proposals and additional representations made.

Where appropriate, comments on specific statutory and third-party representations are provided in subsequent sections of this letter, however it is pertinent to first highlight the continued local support for the scheme. Since the amended drawings were submitted, a further 78 letters of public support have been received during the latest round of consultation; a significant number and clearly demonstrates there remains considerable public support for the scheme locally. Indeed, many responses specifically comment on the positive changes made by Aldi and welcome the steps taken to further amend the scheme. Whilst

Directors
Helen Cuthbert | Stuart Slatter | Claire Temple | Alastair Close
Dan Templeton
Associate Directors
Katie Turvey | Heather Vickers | Alan Williams | Sally Arnold

Consultant
Lorna Byrne
Associates
Rob Scadding | Penny Moss | Sam Deegan | Paul Galgey | Niall Hanrahan
Phil Marsden | Charlotte Perry | Charlotte Hunter | Grace Mollart

it is also noted that a further 36 objections have been received, on review, it is clear the majority of these are duplicates of previous objector comments, and do not raise anything materially new that hasn't already been addressed. Following the latest round of consultation, a total of 414 public responses have been received to the application; comprising 211 in support and 196 in objection. This is a significant number and is clearly indicative of the level of public interest in the scheme.

Design

As noted above, the application was deferred at committee in December 2021 to allow for changes to design. As a result, considerable changes have been made to the design of the building in direct response to comments made by members, which focused on suggestions to reduce the bulk of the building and change materials used to improve views of the store along Farnborough Way.

Full details of changes made are set out in the submitted Design Document, but in summary key changes include:

- The height of the front of the building has been reduced by 1.2m (a 16% reduction in height when compared to the previous scheme), therefore reducing the overall bulk of the building, resulting in a substantial change to the building's setting within the streetscene and views along Farnborough Way;
- As suggested by members, red brickwork has been introduced throughout to add more colour and soften the building, reducing the visual bulk and brightening the development;
- Further glazing has been incorporated into the shopfront to replace areas of render, reducing bulk of the building and opening up views into the store;
- The entrance pop-up feature has been reduced in depth and additional bands added along the northern elevation to add interest and help break up the façade, again reducing the bulk of the building in views along Farnborough Way;
- The landscape plan has been updated to include additional planting along Farnborough Way, in addition to upgraded specification of the proposed hedging to provide an 'instant hedge effect' instead of previous versions which would be achieved after 2-3 seasons growth.

As can be seen in the submitted Design Document and amended plans, the above represent further considerable changes made to the design of the scheme in direct response to comments made at Committee and associated reasons for deferral.

It is important to note that these latest amends have been made in addition to positive changes already made to the design of the scheme as part of earlier discussions with the local community and Officers; and combined it is clear that the scheme now presented differs substantially from that initially submitted in December 2020. This is a result of extensive and sustained direct engagement with the Council and residents in order to understand and address concerns. As noted above, this commitment has not gone unnoticed within public feedback, with several nearby residents specifically commenting on how the design of the scheme has been improved, welcoming positive changes made by Aldi. This should hold significant weight in consideration of the proposals.

Orpington Field Club & Bromley Biodiversity Partnership Sub-group

We note the representation made by the Orpington Field Club & Bromley Biodiversity Partnership Sub-group, dated 7th February 2022 in respect of the submitted landscape plan. This requests that the proposed species are reconsidered to remove Cherry Laurel (*Prunus Laurocerasus*) from the proposed formal hedge planting and ornamental hedge planting, due to Cherry Laurel being an invasive species. In direct response to comments, the proposed landscaping scheme has been further reviewed and the formal hedge planting amended to a native Hornbeam (*Carpinus Betulus*) and the ornamental hedge planting amended to a non-berrying alternative species (*Hebe* and *Dogwood* varieties). This amended landscape plan accompanies this letter and we ask that this supersedes previous versions (Drawing Ref: 2145-VL-L01 Rev H).

To confirm, other recommendations set out within the response are noted and we confirm our agreement to suggested measures i.e. sensitive lighting, inclusion of bat/bird boxes as necessary, as well as careful site clearance.

Retail Matters

The submission was accompanied by a robust sequential assessment and concluded that there are no other sites to accommodate a retail development of this nature. As set out in our letter dated 16th September 2021, the Planning Policy Team confirmed on 24th February 2021 that the sequential test had been adequately addressed. A copy of this response is provided at **Annex 1** for completeness.

Planning Potential responded to comments in an email note to Officers dated 5th March 2021 (**Annex 2**), providing further clarification to the queries raised, including in respect of the requirement to demonstrate flexibility. We have consistently advised officers that we were unaware of further sites to assess and in this letter again asked officers to advise if they were aware of any particular sites that had not been included. They were not. The position in regard to retail policy tests was therefore satisfied. The policy response suggests that if permission were to be granted that a condition should be attached limiting the floorspace to retail use. Aldi are willing to agree to this approach.

Within the original committee report, Officers commented on the location of the site, being within PTAL 1a/1b, suggesting it is unsustainable as it is not well connected to town centres and due to poor accessibility by transport modes other than the car. Officers state at Paragraph 6.1.6 of the December 2021 Committee Report, that the submitted sequential assessment did not consider other out of centre sites with higher PTAL levels that could accommodate the use.

We note the further representation received from MRPP on behalf of Tesco, dated 21st December 2021, which also comments on this point. Their objection suggests, as the sequential assessment did not extend to assess other out of centre sites that are better connected to existing town centres than the proposal site, that the application fails to satisfy the sequential test and should be refused for this reason. This follows an earlier representation from MRPP on behalf of Tesco, dated 8th June 2021, which also suggested failure of the sequential test.

We have already provided a comprehensive response to these initial comments in a rebuttal letter dated 20th July 2021, which set out in detail the approach to and justification for the sequential assessment submitted. This confirmed that the submitted test was both proportionate and appropriate to the proposal and complies with policy and guidance, as set out in NPPF and LB Bromley Local Plan Policy 91 (Proposals for Main Town Centre Uses). Indeed, we have not received anything from Officers subsequently which suggests otherwise. Notwithstanding and without prejudice to this position, we provide further commentary in response to Tesco's latest representation below for completeness

As set out within the original submission, Aldi has had a longstanding requirement for representation in the area, and to this end, has undertaken an exhaustive search of all potential sites over several years. This has also included extensive engagement with the Council during pre-application discussions, and indeed has also extended throughout the course of over a year when the application has been valid. This approach has been in direct accordance with Planning Practice Guidance which notes, *"where appropriate, the potential suitability of alternative sites will need to be discussed between the developer and local planning authority at the earliest opportunity"*. (NPPG Paragraph: 011 Reference ID: 2b-011-20190722). Within this it is also noted that while it is for the applicant to demonstrate compliance with the sequential test, where possible *"the local planning authority is expected to support the applicant in undertaking the sequential test, including sharing any relevant information"*. It is on this basis that we sought to agree the scope of the sequential test with Officers prior to submission.

The submitted sequential assessment focused on potential sites within and to the edge of Farnborough Village Parade and Locksbottom Local Centre, as these are the closest centres to the site. Sites within Orpington Town Centre were also assessed as requested by Officers as part of pre-application discussions. This was undertaken in full accordance with Policy 91 of the adopted Bromley Local Plan (2019) and Paragraph 87 of the NPPF and in line with the scope agreed as part of pre-application

discussions. This was confirmed by the Policy Team in their comments received on 24th February 2021 (**Annex 1**), which state, *“it appears that they have focused on areas that were discussed with officers at pre-application stage and have considered edge of centre sites as well as in-centre sites”*.

To this end, and following initial pre-application discussions, Officers provided a list of sites they wished us to include within any sequential assessment (**Annex 3**). It is noted within this that Officers were clear that *“outside of Orpington, there aren’t many decent sized units on the market”*. Further pre-application discussions took place in 2020 following changes to the design, and potential sites were again discussed. Other than sites already suggested as part of initial pre-application discussions, we were unable to identify any further sites. We wrote to Officers on this basis to ask if there were any additional locations that should be assessed (**Annex 4**). We were not made aware of any further sites, including potential sites with a higher PTAL rating – presumably as officers themselves were also not aware. No further sites were included within the sequential assessment, simply as there were none to assess.

We nonetheless enclose a plan at **Annex 5** which shows the wider area considered. From this it is clear that potential sites are limited. The area is largely residential in nature meaning large scale sites are few and far between. Where these do exist, they are currently occupied and therefore not available. The area also includes large areas of green space, the majority of which is designated open space or Green Belt, where development would not normally be considered appropriate, and in any event would likely be less accessible than the application site. **Annex 5** also includes an extract from the TFL PTAL map, showing wider ratings within the area. This also shows that the majority of this area is equal to or indeed worse than the application site. The areas of a high PTAL rating (i.e. the principal centres), were assessed.

Indeed, it is notable that over the course of the (almost) four years of discussions no additional sites (including any out of centre sites in a higher PTAL location than the proposed site) have been raised. Further, it is also noted that despite allegations that the sequential assessment has not been adequately addressed, no third parties have put forward any specific sites which they consider should be assessed in order to substantiate claims. Indeed, Aldi’s efforts to identify potential sites to help improve representation elsewhere in the Borough is evident from their recently opened store at Springvale Retail Park on Sevenoaks Way to the north of Orpington. Whilst we have been clear from the outset that this store serves a separate catchment area, the fact that the site was identified by Aldi and subsequently developed clearly demonstrates the extensive search for all opportunities in the area.

On this basis, it is quite clear that the approach to alternative sites complies with policy and guidance, as set out in NPPF and LB Bromley Local Plan Policy 91 (Proposals for Main Town Centre Uses).

Notwithstanding and without prejudice to the above, we also comment on MRPP’s claim that the proposed site on Farnborough Way is *“far from accessible”*. This point however does not consider the on the ground situation of residents living locally, and indeed the opposite view has been expressed by over 200 people, who have specifically commented on the accessibility of the site and their ability to walk to the store, noting that they do not currently have a convenience offer that they can access on foot. This includes the many elderly residents living in close proximity to the store who are unable to drive or those who do not have access to a car. The new store would allow these residents to shop closer to home, including on foot, or if by car, as a shorter journey; therefore reducing unsustainable travel patterns.

This is a significant benefit of the proposals locally.

Highways

As detailed in our letter dated 16th September, based on discussions to date neither London Borough of Bromley Highways nor Transport for London have raised objections to the proposals including in respect of trip generation, highway arrangements, site access or parking provision. Both Planning Potential and Connect Consultations have provided comprehensive responses to issues raised. These set out our clear position and this remains unchanged.

Farnborough Village Society

We note further representations made by the Farnborough Village Society, dated 8th February 2022. These have been reviewed by Aldi's highways consultants, and it is considered comments do not raise anything materially new that has not already been assessed as part of the application, in discussions with both Bromley Highways and TfL. Notwithstanding, further commentary is provided on main points raised below for completeness.

In respect of concerns about the capacity of the on-demand traffic light crossing close to the site, this has been considered by our highways consultants who have concluded that, when taking into account factors such as; the frequency with which the crossing would be used, the interruption caused to traffic, and the volume of traffic on Farnborough Way, use of the crossing following introduction of Aldi would not lead to traffic problems.

We also note concerns raised in relation to the potential for U-turns to take place on the A21 or at the Starts Hill Road junction. Transport for London have already advised that 'no U-turn signs' should be provided to prevent this manoeuvre which Aldi have agreed to fund. As a result, as we have already set out, some traffic will travel through Farnborough Village using the B2158, and it is not unreasonable for a modest volume of additional traffic to use this road given its classification. The effect of the Aldi development on this has been quantified in the submitted Transport Assessment and subsequent Technical Notes and has been found to be acceptable. This is confirmed at Section 6.4 of the December 2021 Committee Report.

Trees and Biodiversity

As detailed in our letter dated 16th September 2021, the submitted Ecology Assessment was updated in response to comments received. No outstanding matters remain, and proposals are considered acceptable in respect of trees and biodiversity. This is confirmed at Section 6.6 of the December 2021 Committee Report.

Noise

As detailed in our letter dated 16th September 2021, the submitted Noise Impact Assessment was updated in response to EHO comments and servicing hours amended. To confirm, the EHO have subsequently confirmed that matters previously raised have been adequately addressed and there are no noise related objections to the proposal subject to conditions should permission be granted. This is confirmed at Section 6.5 of the December 2021 Committee Report.

Drainage

As detailed in our letter dated 16th September 2021, the submitted Drainage Strategy & Flood Risk Statement was updated in response to LLFA comments. To confirm, both the Council's Drainage Team and Thames Water have reviewed submitted information and subsequently confirmed no objection subject to conditions should permission be granted. This is confirmed at Section 6.8 of the December 2021 Committee Report.

Energy & Sustainability

As detailed in our letter dated 16th September 2021, the Renewable and Low Carbon Energy Statement was updated in response to comments received. To confirm, this has been reviewed no objections raised. This is confirmed at Section 6.9 of the December 2021 Committee Report.

Lighting

As detailed in our letter dated 16th September 2021, an email dated 10/08/21 confirmed that the submitted lighting assessment was satisfactory. This is confirmed at Section 6.5 of the December 2021 Committee Report.

Air Quality

As detailed in our letter dated 16th September 2021, an email dated 30/07/21 confirmed no objection on air quality grounds subject to conditions should permission be granted. This is confirmed at Section 6.5 of the December 2021 Committee Report.

Conclusion

I trust the above and enclosed is clear and further consolidates the significant changes made to the design of the scheme in response to the reasons for deferral, as well as provides sufficient clarification on outstanding matters to enable the application to progress towards committee in due course. However, please do not hesitate to contact Alastair or myself directly should you have any questions or wish to discuss further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K Clarke', written over a circular stamp or mark.

Katia Clarke

Planner

Planning Potential

London

Enc.

Annex 1

Exempt Policy Comments

Application No: 20/04838/FULL1

Proposal: Demolition of existing buildings on site. Redevelopment to provide a foodstore (Class E) and associated access, car parking, and landscaping works.

Site Address: Frankie & Benny's Farnborough Way, BR6 7DH

Case Officer: Agnieszka Nowak-John

The comments below outline the Planning Policy Team assessment of the proposal, setting out the consistency of the proposal against relevant individual planning policies. These comments do not provide an opinion on the overall planning balance and whether the proposal is acceptable. This will be subject to a separate determination, factoring in other relevant information including comments from other consultees.

Publication London Plan (December 2020)

An updated 'Intend to Publish' version of draft London Plan – entitled Publication London Plan December 2020 - was published on 21 December 2020. This version of the draft plan includes changes made by the Mayor in response to several Directed Changes made by the Secretary of State in March and December 2020. The relevant documents are available on the Mayor's website: <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/publication-london-plan>

The Publication London Plan (December 2020) is a material consideration in the determination of this planning application. **Paragraph 48** of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to: (1) the stage of preparation of the emerging plan; (2) the extent to which there are unresolved objections to relevant policies in the emerging plan; and (3) the degree of consistency of relevant policies to the policies in the Framework.

The Publication London Plan is awaiting formal publication. In a letter dated 29 January 2021, the Secretary of State has confirmed that the plan can be published.

The London Assembly considered the Publication London Plan at a plenary meeting on 6 February 2020 and did not exercise their power to veto the plan.

Considering this information against paragraph 48 of the NPPF, the Publication London Plan (December 2020) is considered to have very significant weight, in effect full weight. Taking this into account, the Publication London Plan policies should be used to determine this planning application, alongside policies in the adopted Local Plan. Policies in the current adopted London Plan (2016) are not considered relevant for this determination. Where there is conflict between the policies in the Publication London Plan and the policies in the adopted Development Plan, the Publication London Plan should generally be given primacy.

Upon adoption of the new London Plan, it will become the most up-to-date Development Plan Document for the London Borough of Bromley, and therefore, in accordance with section 38(5) of the Planning and Compulsory Purchase Act 2004, *“if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.”*

Application Site and Relevant Planning History

The application site is approximately 0.34ha (as stated by the applicant in the Planning Statement). With a PTAL of 1a/1b, it is located off Farnborough Way (A21) and lies South West of Orpington Town Centre. There is an existing Frankie and Benny’s currently situated on site. The restaurant use itself is a historic A3 use that pre-dates the current town centres policies set out in the NPPF.

Pre-application discussions were initially held with the Council in 2018 (PREAPP/18/00201) for redevelopment of the site for an ALDI foodstore. A second pre-application was submitted in September 2020 (PREAPP/20/00167) which raised some issues about the approach to retail and sequential test.

The proposed scheme would require demolition of existing buildings and redevelopment of the site to provide a retail foodstore (1,843sqm), with a net retail sales area of 1,093sqm and a level car park with 49 spaces.

Retail and Sequential Test

The applicant proposes a retail use in an out of centre location which would compete for customers that otherwise would have visited nearby centres such as Orpington Town Centre or Locksbottom Local Centre.

Local Plan **Policy 91 Proposals for Main Town Centre Uses** requires proposals for main town centre uses to be located within designated centres or, if no in-centre sites are available, sites on edge of centres. Only if suitable sites are not available in Town Centres or in edge of centre locations should out of centre sites be considered.

Proposals for new main town centre uses outside of existing centres will be required to meet the sequential test as set out in the NPPF.

NPPF **paragraph 86** states 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. Paragraph 87 states that where considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale, so that opportunities to utilise suitable town centre or edge of centre sites are fully explored.

The applicants outlined their sequential approach in their planning statement. It appears that they have focused on areas that were discussed with officers at pre-application stage and have considered edge of centre sites as well as in-centre sites. The sites that they have identified would suggest that there is no flexibility to alter the proposal, although there is a lack of explanation as to why that

flexibility would not be possible. Nonetheless, it is my view that they have adequately carried out the sequential assessment.

If this application is approved, it is essential that there is a condition to limit the use to retail foodstore within class E. Other uses may have different impacts and may be able to be accommodated within sequentially preferable locations, therefore a condition would require them to apply to alter/remove and we can then require further sequential test.

The subject site has a PTAL level of 1a/1b and would be difficult to describe as accessible and well connected to town centres (by sustainable transport options); therefore it is not a site that would be afforded preference in accordance with NPPF paragraph 87. Should the Council be satisfied that no in-centre sites, or edge-of-centre sites within 300m of a primary shopping area, are available (or expected to become available within a reasonable period), further consideration should be given to the availability of other out of centre sites with higher PTAL levels that could accommodate the use.

Retail Car Parking

The Publication London Plan (2nd March 2021) **Table 10.5 of Policy T6.3 Retail Parking** outlines the maximum parking standards that should be applied to new retail development. Outer London has an agreed standard of up to 1 space per 50sqm (GIA). The applicant proposes that the ALDI food store will have a GIA of approximately 1843sqm. On this basis, a total of 36 parking spaces would be appropriate and the proposal of 49 parking spaces would not be acceptable.

Annex 2

Katia Clarke

From: Katia Clarke
Sent: 05 March 2021 15:44
To: Nowak, Agnieszka
Cc: Alastair Close
Subject: RE: Aldi Farnborough Way
Attachments: 2004838FULL1 Frankie Bennys.docx

Good afternoon Agnieszka,

I hope you are well. Thank you for sending across the attached policy comments, to which we respond below.

Publication London Plan (December 2020)

Comments here are noted and it is accepted, given the London Plan 2021 has now been adopted, that policies within this document now have full weight and should be used to determine this planning application, alongside those in the adopted Local Plan. However, overall, the new LP does not raise considerations that have not already been addressed through the comprehensive suite of supporting documents.

Retail and Sequential Test

Overall, it is encouraging that Officers are satisfied that the sequential test prepared in support of the application is passed. However, it is noted that some queries have been raised, and so we respond to these for robustness, avoidance of doubt and completeness.

Comments suggest we have perhaps not been flexible enough in our sequential approach. The sequential assessment is set out at section 4 of the Planning and Retail Statement (PRS). This has been undertaken in accordance with NPPF, NPPG and relevant appeal precedents and Case Law. Indeed, we note and welcome that the policy comments do not dispute the relevant appeal decisions and Case Law to which we have referred.

Paragraph 4.27 clearly identifies the designated centres within proposed store's catchment area to be Farnborough Village Parade and Locksbottom Local Centre. The assessment considered any suitable and available sites within these centres. However, in addition and for completeness, the sequential assessment also considered potential sites within and to the edge of Orpington Town Centre. This was undertaken in full accordance with Paragraph 86 of the NPPF and associated guidance (NPPG Paragraph: 009 Reference ID: 2b-009-20190722).

Paragraphs 2.50 and 4.34 of the PRS clearly set out the flexibility already demonstrated by Aldi to bring forward a store on the application site in order to meet significant need for discount retail in the area. Specifically, Table 1 provides detail of how this flexibility has been achieved through a reduced sales area, warehousing on lower ground floor rather than at grade, and a reduction in the standard number of parking spaces. It is this scheme that potential sequential sites have been assessed, and even with these deviations from Aldi's core requirements, no sites were identified to be available or suitable. This clearly demonstrates the level of flexibility already shown by the applicant as required by Paragraph 87 of the NPPF. As such, the sequential assessment provided was undertaken in accordance with best planning practice.

Notwithstanding the above, as also set out in the Planning and Retail Statement and as Officers will be aware, we have been involved in discussions with the Council in respect of potential sites for almost 3 years, having initiated pre-application discussions in relation to the application site back in 2018. The scope of the sequential assessment and list of potential sites was agreed at this stage, and Officers have not since been able to provide any additional sites which should be considered. As such, our sequential assessment provided is extremely robust. This assessment has been found to have been passed by policy officers and we welcome this position.

Retail Car Parking

We note that the comments suggest there should be 36 spaces in line with the Publication London Plan. However, we can advise that Aldi's highway consultants have since met with representatives from TfL and London Borough of Bromley Highways, who have both confirmed that they are comfortable with the level of parking proposed. Specifically, LBB Highways said they are happy to exceed the London Plan standard as they have concerns over there being too few spaces. They have noted that the proposed provision is an acceptable and appropriate balance.

I trust the above makes sense and provides necessary clarification on points raised by your policy colleagues, but I would be grateful if you could confirm.

Separately, it has been some time since we met, and so would it be helpful to have another meeting? I am conscious that we have not yet discussed design in much depth so may be useful to run through on another call.

Many thanks
Katia

From: Katia Clarke
Sent: 25 February 2021 16:04
To: Nowak, Agnieszka <Agnieszka.Nowak@bromley.gov.uk>
Cc: Alastair Close <alastair.close@planningpotential.co.uk>
Subject: RE: Aldi Farnborough Way

Agnieszka,

Thank you for sending this across – we will review and come back with response / any questions.

Many thanks
Katia

From: Nowak, Agnieszka <Agnieszka.Nowak@bromley.gov.uk>
Sent: 24 February 2021 11:48
To: Katia Clarke <Katia.Clarke@planningpotential.co.uk>
Cc: Alastair Close <alastair.close@planningpotential.co.uk>
Subject: RE: Aldi Farnborough Way

Hi Katia,

Policy comments attached. Still chasing the remaining responses.

Agnieszka

From: Katia Clarke <Katia.Clarke@planningpotential.co.uk>
Sent: 23 February 2021 15:31
To: Nowak, Agnieszka <Agnieszka.Nowak@bromley.gov.uk>
Cc: Alastair Close <alastair.close@planningpotential.co.uk>
Subject: RE: Aldi Farnborough Way

Good afternoon Agnieszka,

I hope you are well. Further to the below, is there any update on timescales for getting a response from outstanding consultees?

Many thanks

Annex 3

Katia Clarke

From: Owens, Hannah <Hannah.Owens@bromley.gov.uk>
Sent: 15 August 2018 09:39
To: Katia Clarke
Subject: Pre-Application Response - Frankie and Benny's
Attachments: Frankie and Benny's Pre-application Response.pdf

Dear Katia,

Please find attached the formal pre-application response with regard to the Frankie and Benny's site on Farnborough Way.

Further to our discussions at the meeting, we have also identified the below sites that fall within Orpington Town Centre that appear to fit the requirements for ALDI and fall within the "available within a reasonable period" category. Please note that these are put forward on a 'without prejudice' basis and will be subject to future planning applications:

- The Thornburrows shop at 257-259 High St (1,301 sqm) closed earlier this year but has not been marketed.
- 208-212 High St (2,211 sqm) is currently occupied by Poundworld, who are reportedly shutting all stores this month.
- 214 High St (2,412 sqm) is the Orpington post office, which has closed its retail function. The sorting office is still operational; depending on future plans, there may be potential for a new retail occupant at the frontage.
- The ground floor at Templegate House, 115-123 High St (516 sqm) has been available since 2015. Similarly, 158-160 High St (554 sqm) across the road is also available but may be too small in its current format.

Outside of Orpington, there aren't many decent sized units on the market at the moment. The Warren Evans shop is the largest available A1 unit in BTC (718 sqm).

I hope this helps,

Kind Regards

Hannah

Hannah Owens
MPlan(Hons) MRTPI
Principal Planner
Development Control (Major Development)
Planning Department

London Borough of Bromley, Civic Centre, Stockwell Close, Bromley, BR1 3UH
Tel: 0208 4617421

----- London Borough of Bromley E-Mail Disclaimer -----

Annex 4

Katia Clarke

From: Katia Clarke
Sent: 13 October 2020 17:34
To: Parker, Hannah; Bradshaw, Karen
Cc: Alastair Close
Subject: RE: Pre-application - ALDI stores, Frankie and Benny's, Farnborough Way, Orpington

Good afternoon Hannah,

Many thanks for the below, that's helpful.

Also noted in terms of the delay, but are you able to update at all on when we can expect the written response? In addition, I would be grateful if you could confirm if you intend to come back on sequential, or whether like us, the Council are not aware of any suitable and available alternative sites.

I look forward to hearing from you.

Many thanks
Katia

From: Parker, Hannah <Hannah.Parker@bromley.gov.uk>
Sent: 02 October 2020 09:50
To: Katia Clarke <Katia.Clarke@planningpotential.co.uk>; Bradshaw, Karen <Karen.Bradshaw@bromley.gov.uk>
Cc: Alastair Close <alastair.close@planningpotential.co.uk>
Subject: RE: Pre-application - ALDI stores, Frankie and Benny's, Farnborough Way, Orpington

Dear Katia,

Thank you for your email. Unfortunately Karen is off sick at the moment so there will be a delay in getting the comments to you.

You don't require any BREEAM standard in planning policy terms so we would not expect you to present anything specific.

You need to look at the current and draft New London Plan policies and make sure that any submission demonstrates accordance with those – BREEAM is not a substitution for an energy statement and carbon reduction strategy in accordance with the GLA guidance.

Kind Regards

Hannah

Hannah Parker
Development Management Team Leader – Major Developments
Housing, Planning and Regeneration Services
Bromley Council, Stockwell Close, Bromley BR1 3UH
020 83134691
Hannah.Parker@bromley.gov.uk
www.bromley.gov.uk/planning

From: Katia Clarke <Katia.Clarke@planningpotential.co.uk>
Sent: 01 October 2020 12:50
To: Parker, Hannah <Hannah.Parker@bromley.gov.uk>; Bradshaw, Karen <Karen.Bradshaw@bromley.gov.uk>
Cc: Alastair Close <alastair.close@planningpotential.co.uk>
Subject: RE: Pre-application - ALDI stores, Frankie and Benny's, Farnborough Way, Orpington

Afternoon Karen / Hannah,

I tried to call just now but wasn't able to get through.

We are keen to progress with application preparation and therefore further to the below, I would be grateful if you could please send across any sequential sites that the Council are aware of that you would expect to see within our sequential assessment. This was discussed at the meeting and it was agreed that you would get back to us with sites before issue of your written response. If we have not heard back on this, we will assume that the Council, like us, are not aware of any suitable and available alternatives.

Separately, I would be grateful if you could come back on the BREEAM point below.

If you could also please update on progress with your written pre-app response it would be appreciated.

I look forward to hearing from you.

Many thanks
Katia

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From: Katia Clarke
Sent: 22 September 2020 16:54
To: Parker, Hannah <Hannah.Parker@bromley.gov.uk>; Bradshaw, Karen <Karen.Bradshaw@bromley.gov.uk>
Cc: Alastair Close <alastair.close@planningpotential.co.uk>
Subject: RE: Pre-application - ALDI stores, Frankie and Benny's, Farnborough Way, Orpington

Afternoon both,

Apologies, I just have a further query in addition to the below. It is noted that Bromley do not currently have a BREEAM requirement. As we set out in the letter, we are happy to provide a BREEAM pre-assessment

detailing what the building can achieve, but wanted to check that from a policy perspective, the Council are not expecting a specific rating?

Happy to discuss on the phone if easier.

Many thanks,
Katia

From: Katia Clarke
Sent: 22 September 2020 12:56
To: Parker, Hannah <Hannah.Parker@bromley.gov.uk>; Bradshaw, Karen <Karen.Bradshaw@bromley.gov.uk>
Cc: Alastair Close <alastair.close@planningpotential.co.uk>
Subject: Pre-application - ALDI stores, Frankie and Benny's, Farnborough Way, Orpington

Good afternoon Karen / Hannah,

Many thanks again for your time last week to discuss the proposals – this was much appreciated and a very helpful meeting.

It was discussed during the meeting that we would like to agree a list of sequential sites so we can ensure our sequential analysis covers the sites you expect to see. In this regard, as set out on the call, we are not aware of any sites within Locksbottom Local Centre or Orpington Town Centre that are both suitable and available to accommodate the proposed development. However as agreed, we would be grateful if you could please let us know if there are any sites that you are aware of that you would expect to see within our sequential assessment.

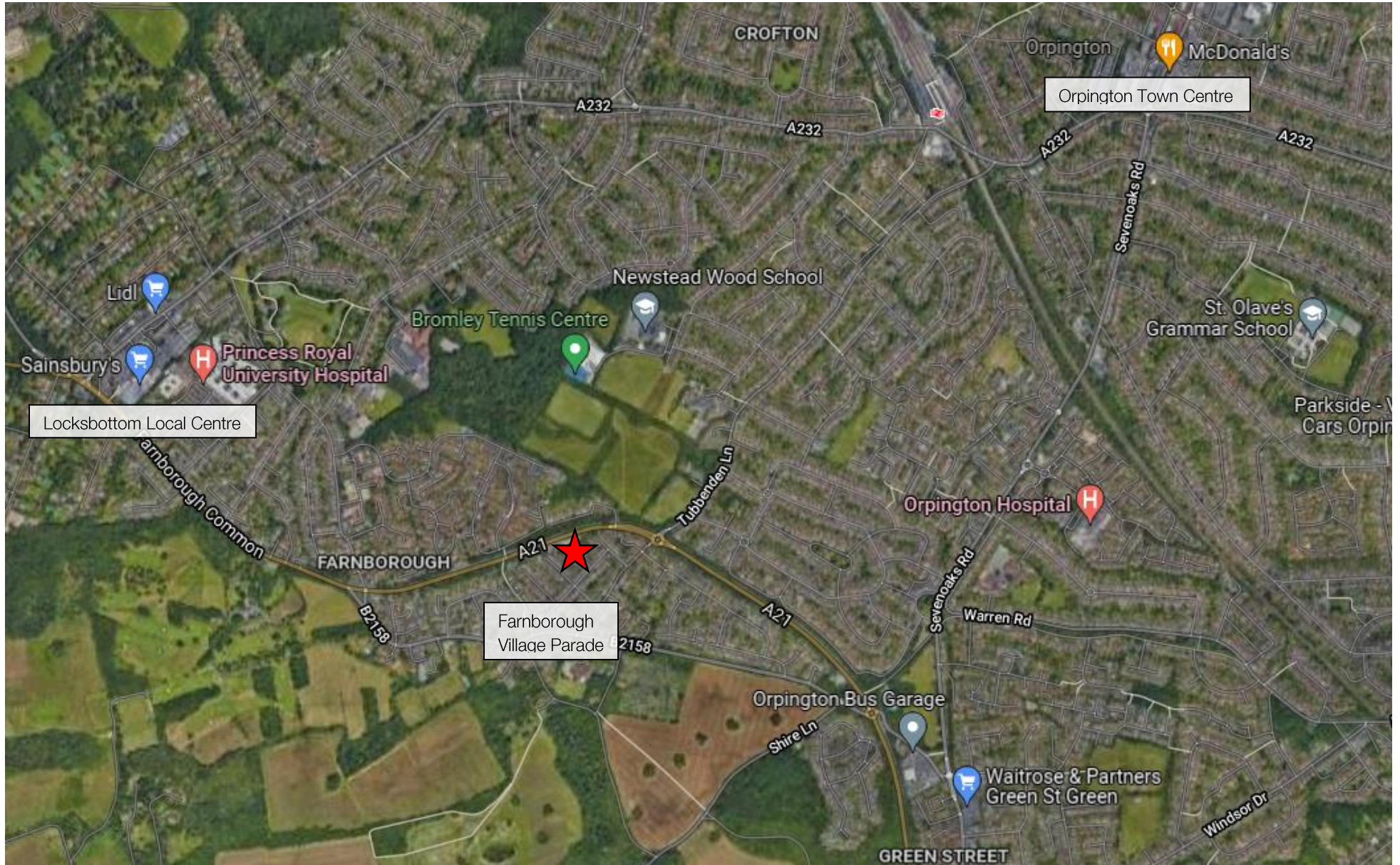
As mentioned, we are keen to get on with things and submit an application in due course and so I would also be grateful if you could advise when we might expect your written response?

I look forward to hearing from you.
Many thanks
Katia

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Annex 5



Source: Google Maps (2022)

