

Committee	PLANNING COMMITTEE (C)	
Report Title	FORMER TELECOM DEPOT, 27 FORDMILL ROAD SE6 3JH	
Ward	Catford	
Contributors	Gemma Barnes	
Class	PART 1	Date: 20 <sup>th</sup> OCTOBER 2011

Reg. No. DC/11/77936 as revised

Application dated 20<sup>th</sup> July 2011 revised on 13<sup>th</sup> September 2011 and 26<sup>th</sup> September 2011

Applicant Mr P Patel PPML Consulting on behalf of Mr S Sheth, Empire Partners

Proposal Demolition of the warehouse unit at Former Telecom Depot, 27 Fordmill Road SE6 and its replacement with a new Use Class B8 warehouse unit of some 6715 sqm for storage and distribution of wholesale foods, together with car and cycle parking, landscaping and minor modifications to the two existing access points.

Applicant's Plan Nos. 110420-01, 11\_017\_D002\_A, 11\_017\_D003, 027/PL/100, 11008B-01, 02, 03, 04, 05, 06, 027/PL/001, 002, 003, 004, 005, 006, 200, 201, 202, 203, 250, 300, 301, 027/SK/001 and 002, 000/WD/001 REV. C, Air Quality Statement, Screening Opinion, Planning Statement, Planning Obligations Template, Flood Risk Assessment (as revised), Transport Statement, Energy Statement, Design & Access Statement, Contractors Proposal, Delivery and Servicing Plan, BREEAM 2008 Pre-Assessment, Archaeological Assessment and Ground Investigation Report

Background Papers

- (1) Case File - LE/720/H-K/TP
- (2) Adopted Unitary Development Plan (July 2004)
- (3) Local Development Framework Documents – specifically the Core Strategy (June 2011)
- (4) Employment Land Study (2008)
- (5) The London Plan (July 2011)

Designation Area of Archaeological Priority, PTAL 2/3, Flood Risk Zone 2/3, Local Open Space Deficiency, Strategic Industrial Location, Adjacent to Culverley Green Conservation Area

Screening Negative Screening Opinion issued on 8<sup>th</sup> August 2011.

## **1.0 Property/Site Description**

- 1.1 This application relates to a fairly large Industrial Site (1.41ha) located within the Bromley Road Strategic Industrial Location (SIL). The site is located on the southern side of Fordmill Road sandwiched between the railway line and Ravensbourne River. The site currently comprises a large warehouse which is situated centrally within the plot with hard standing for parking around the perimeter of the site and two small ancillary buildings along the western edge. The site has a double access from Fordmill Road. The northeast boundary of the site comprises dense planting, the other rear/side boundaries are secured by 1.8 – 2.0m palisade fencing and planting, the front boundary comprises railings and planting.
- 1.2 The site was formerly used by British Telecom as a service depot. Following cessation of the use by British Telecom small ad-hoc business have occupied parts of the site including a coach company, skip storage company, scaffolding company and MOT centre. The lawful use of the site falls within a Business Use class.
- 1.3 The sites lies in an area of mixed use and character. There are residential properties to the east (as well as commercial use at 25 Fordmill Road) and on the other side of the railway line. To the south of the site lies Barmeston Road and the former Police Depot. Further to the south/southeast lies the Ravensbourne Retail Park, Catford Bus Depot and Bellingham Trading Estate.
- 1.4 Topography of the site is sloping east to west. The railway line creates a high buffer to the site on the western side which means the site is barely visible from Tibbenham Place or Knapmill Road. The dense planting on the northeast boundary means the site is barely visible from 23/25 Fordmill Road. The site can be viewed from the rear windows and gardens of properties in Barmeston Road.
- 1.5 This site lies within the northern section of the Bromley Road SIL. The Employment Land Study (2008) describes the Bromley Road SIL as a large employment site of strategic importance partly because of its location but also because of its scale. The SIL has the potential to accommodate a large proportion of employment land. This SIL should rank high on any list of sites to benefit from protection as employment land in the Borough.

## **2.0 Planning History**

- 2.1 **1971:** The demolition of the existing buildings and the erection of a Telephone Service Centre including offices, workshops and stores, open storage van and car parking on the land at the rear of the former Golden Shred Works, Bromley Road fronting onto Fordmill Road. Granted.
- 2.2 The erection of a Telephone Maintenance and Service Centre on the land at the rear of the former Golden Shred Works, Bromley Road fronting onto Fordmill Road including a two storey administrative block linked to a single storey store and workshop, together with two open storage areas, car wash and petrol pump facilities and the provision of 169 parking spaces for various vehicles. Granted.
- 2.3 **1978:** The erection of a single storey Telephone Maintenance and Service Centre on land at the rear of the former Golden Shred Works, Bromley Road fronting onto

Fordmill Road, together with open storage areas, vehicle wash and petrol pump facilities and the provision of 165 parking spaces. Granted.

2.4 **DC/02/52952:** Certificate of Lawfulness in respect of the use of BT Engineering Offices & Workshops, 27 Fordmill Road SE6, as a motor transport workshop (Use Class B2). Granted.

2.5 **DC/04/57163:** The change of use of the existing factory and yard at 25 Fordmill Road SE6, for the parking and storage of funeral/wedding cars (Use Class B8), together with ancillary offices.

### **3.0 Current Planning Applications**

#### The Proposals

3.1 Permission is sought for demolition of the existing vacant B8 warehouse unit and erection of a new B8 warehouse unit (6715 sqm) for storage and distribution of wholesale foods. The cash and carry style operation will be used by members only who will use it to stock their own grocery and retail outlets and to provide catering supplies to restaurants, hotels etc... The proposed use is a wholesale warehouse not a general retail unit so will not be open to the general public. As such the proposal falls within a B8 Use Class. General retail (A1) is not permitted and would be restricted by condition.

3.2 The new building would occupy a large portion of the site being set in 6.8 – 8.6m from the western boundary, 5-25m from the north (front) boundary, 14m from the eastern boundary adjacent to 23/25 Fordmill Road, 8.0 - 22m from the eastern boundary adjacent to properties in Barmeston Road and 7-10m from the southeast boundary adjacent to the police station.

3.3 The building is of simple warehouse design constructed of red brickwork (2.2m high) and Cream colour Kingspan Composite Cladding. There are no windows proposed in the elevations. The roof material would be Grey colour Kingspan roofing panels with polycarbonate raised rooflights. The dimensions of the building would be 150m x 52m (at its largest points), the height of the pitched roof building would range 8-11m compared to the existing building which is 6-8m high.

3.4 The double height building would comprise ground floor accommodation only save for a small staff seating area on the first floor towards the southern end of the building. The large floor to ceiling height is required for storage of bulk materials on palettes. The building has been designed so that it steps in on the north and south sides, consequently the front (east) elevation is 86m wide compared to the rear (west) elevation which is 147m wide. A polycarbonate canopy would be erected along the eastern facade to provide covered access into the building. The canopy would project 8.0m from the face of the building and would be 5.9m high.

3.5 The building has been designed with the staggered end towards the rear of the site in response to the need to maintain an appropriate distance between the building and the River Ravensbourne which runs along the north and east boundaries. It is at this point the building would be closest to neighbouring residential dwellings. Those properties most likely to be affected by the proposal would be 54-58 Barmeston Road where a distance of 8-10m would be retained

between the building and the boundary. The Ravensbourne River then separates the application site from the adjacent residential curtilage.

- 3.6 An external staff seating area would be located towards the front of the site between the proposed building and the front boundary. This area would also accommodate a substation (if required). The seating area would comprise three picnic tables capable of accommodating 18 people at any one time. The area would be well screened from the road by virtue of the proposed landscaping scheme.
- 3.7 Delivery access would be located to the west of the building with delivery vehicle turning circle provided at the southern end of the site. A separate customer access and parking would be provided to the east of the building.
- 3.8 The east of the site would be hard landscaped to accommodate 68 car parking spaces. The perimeter of the site would be soft landscaped. It is proposed to provide two cycle stands capable of accommodating 32 cycle parking spaces.
- 3.9 Minor modifications to the two existing junctions are required to improve kerbing and sight-lines.

#### Supporting Documents

Design and Access Statement  
Planning Statement  
Preliminary Geo Environmental and Geotechnical Ground Investigation Report  
Revised Flood Risk Assessment  
Transport Statement  
Delivery and Servicing Plan  
Air Quality Statement  
Vascroft Contractors Proposal  
BREEAM Pre Assessment  
Energy Statement  
Archaeological Desk Based Assessment

#### **4.0 Consultation**

- 4.1 This section outlines the consultation carried out by Patel PPML Consulting prior to submission and the Council following the submission of the application and summarises the responses received. The Council's consultation exceeded the minimum statutory requirements and those required by the Council's adopted Statement of Community Involvement.
- 4.2 A Site notice was displayed on 10<sup>th</sup> August 2011. Letters were sent to 319 local residents on 4<sup>th</sup> August 2011 and relevant ward Councillors were notified of the application. The Environment Agency, English Heritage, Thames Water, Highways, Environmental Health and Environmental Sustainability were also consulted.
- 4.3 Given the low number of third party letters received in response to the Council's consultation a local meeting has not been held.

## Pre-Application Consultation

- 4.4 It is stated in the Design and Access Statement that prior to submission of this application the applicant undertook a consultation exercise. A pamphlet describing the development proposal was sent to local residents on 20<sup>th</sup> July 2011.
- 4.5 A copy of the pamphlet was submitted with the application.
- 4.6 The applicant received no responses as a result of the consultation exercise.

## Written Responses received from Local Residents and Organisations

- 4.7 At the time of writing, 6 letters of objection had been received from occupiers of 13, 18 (x2 letters), 21 Fordmill Road, 64 Barmeston Road, 137 Brookdale Road and 6 Vernham Road. The following objections were raised:-
- Fordmill Road has become a 'rat run' with vehicles breaking the speed limit;
  - There is a blind bend 50m from the junction with Canadian Avenue which causes major problems for any large vehicles as pavement parking exists on both sides of the road;
  - This is a bus route where TfL only allow smaller, narrower buses than normal to pass through, even two narrow buses cannot pass each other;
  - There is a blind bend in the road looking from the railway bridge;
  - At busy times an articulated lorry caught in Fordmill Road will cause major problems as buses are not allowed to reverse with passengers on and if there is traffic behind a lorry it will have to try to negotiate the situation;
  - The operating times are 7 days per week so fresh produce will need to be available 7 days per week;
  - Fresh produce will need to be delivered before the store opens (ie: before 08:00) so it is unlikely that stated delivery times will be adhered to;
  - There will be an increase in traffic to the site which means an increase in danger to children and elderly pedestrians;
  - The loading and unloading of pallets will be noisy;
  - There is no necessity for a cash and carry in this residential area as there is already a cash and carry less than 1 mile from the site in Brownhill Road;
  - The trip analysis has been carried out for a cash and carry of 3000 sqm so the results should be doubled at least;
  - A larger store will stock a wider range of goods thus attracting more customers than a store of 3000 sqm;
  - Articulated 17.5 tonne lorries are not allowed in Canadian Avenue. There is a height restriction to 16.5 tonnes. If this restriction were removed other articulated vehicles would use this route;
  - Reference to ease of access to the site by train and bus is disingenuous as most people will arrive by car;
  - The existing car parking spaces onsite are not in use, there is no large volume of vehicles using the site as there would be if the proposal was given the go ahead;
  - The daylight/sunlight assessment show the impact of the existing building, this should show the impact of the proposed building;

- The traffic survey was undertaken on the day before the school summer holidays started. This one day survey is not enough to determine traffic impact;
- The proposed entry and exit require in-bound delivery vehicles to be driving north along the A205 South Circular to turn right into Canadian Avenue. A vehicle travelling south down the A205 or in either direction along the A21 would have to perform a large detour increasing carbon footprint and giving rise for potential in illegal manoeuvres by time-pressed delivery drivers;
- It is naive to assume that vehicles using this site will be low-emission vehicles;
- The proposed building is too big for the site;
- There are other Brownfield sites along Bromley Road which could accommodate this development;
- This site could be put to better community use;
- There will be a lot of noise and dust during construction;
- What assurances are that that operational jobs will be sourced from the local market;
- The stated job creation is 'merely positive' not 'very positive';
- What provisions are in place to ameliorate the impact of demolition and construction of the proposed development on local residents?
- Are there restrictions in place to limit the delivery of plant and machinery to office hours or similar on Monday to Friday only?
- Are there restrictions in place to limit works to reasonable (office hours or similar) hours Monday – Friday?
- Are there limitations and levels set for the amount of noise/dust created during construction?
- What impact will this have on existing on-street parking provision outside and adjacent to the site?
- What impact will site traffic have on overall traffic levels from Canadian Avenue into Fordmill Road and from Brookhowse Road into Fordmill Road?
- Note from plans at appendix A that final development will require the restriction of existing on-street parking across the length of the site in Fordmill Road. Parking in this area is currently in heavy use during Monday – Friday and the impact that loss of space here will have on residents either side of the site, towards Canadian Avenue to the North and further down Fordmill Road beyond the rail bridge to the South could be great. We currently do not have designated parking zones for residents in any part of Fordmill Road.
- Further below in the Service & Delivery Plan – the frequency of heavy goods (16.5 ton articulated lorry delivery) is identified as averaging one per day during Monday – Friday. This is in addition to other delivery traffic of lower designation.
- What assurance is there that articulated Lorries of 16.5 tonnes in weight will be restricted to one delivery per day on week days? What measures are in place to restrict this type of vehicle to this frequency?
- Is there sufficient and adequate turning space at the junction of Canadian Avenue and Fordmill Road to accommodate this size of vehicle?
- What impact will this weight of traffic have on the canal bridge and road leading up to the site entrance in Fordmill Road?

- What assurances and restrictions are in place to direct articulated vehicles via the suggested routes up Canadian Avenue and Bromley Road instead of via Brookhowse and Fordmill Road?
- Bearing in mind the information about the anticipated frequency of articulated (16.5 tonnes) delivery vehicles, in addition it is stated that 12-17 deliveries per day are anticipated between Mondays – Fridays. These are expected to range in size from 7.5 – 17.5 tonnes in weight and measure up to 36 metres in length. This equates to an additional 60-85 heavy goods vehicles using the roads between Monday and Friday. This also equates to a rate of one delivery every 45 minutes to an hour throughout the day. We believe this is an excessive amount of additional heavy goods traffic which will have a negative impact on the infrastructure and environment and on local residents.
- What assurances are there that heavy goods vehicles will be restricted to Monday – Friday use?
- What restrictions are in place to ensure that levels of delivery by heavy goods vehicles will not also occur outside these times and beyond these levels?
- The route Canadian Avenue through to Fordmill Road towards Brookhowse Road is a recommended route for cyclists, and in addition a 20 mile per hour speed restriction has been in place in order to calm traffic in the area. I do not believe it is therefore suitable as a route for heavy goods. I note from recent traffic surveys done in Bellingham that the number of injuries specifically to cyclists has increased since 2003, and the addition of heavy goods traffic along this route cannot be beneficial in reducing accident rates amongst this road user group;
- Noted that the surveys undertaken to ascertain existing traffic density on the routes to and from the site were conducted on one single day, at times identified by the surveyors as peak traffic times. (07:00 – 09:00 and 16:00 – 19:00 on a single Thursday).
- Bearing in mind that site opening hours are planned to be 08:00 – 20:00 Monday – Friday and until 16:00 on Saturdays and 15:00 on Sunday – we do not consider these surveys to have adequately assessed current traffic volumes and density, nor the impact that anticipated traffic volumes will have on the surrounding area and residents.
- We know that more longitudinal traffic census's have recently been undertaken both in Fordmill Road j/o Knapmill Road and in Canadian Avenue en route to Fordmill Road, and would expect that more accurate data could be derived from these or other sources held by the Local Authority.
- It is also noted from the planning application that the anticipated peak time for customers to visit the site is between the hours of 11:00 – 12:00, so we would challenge the validity of merely selecting early morning “rush hour” and evening “rush hour” times to undertake the survey.
- Even if the figures taken from the planning application were valid, this would equate to an average of an additional 109 arrivals and departures per hour at peak times. (11:00 – 12:00). The impact of this on local residents in terms of increased noise and pollution would therefore be considerable, particularly at the weekends.
- The streets on the Bellingham estate which form the suggested route for customer traffic to the proposed Cash and Carry are narrow, and the impact of increased customer traffic (likely to include light vans as well as

cars) will therefore be more considerable. As stated previously, a range of traffic calming measures, including speed patches and 20 miles per hour speed restrictions are currently in place along this route in recognition of the need to address accident and safety issues. Increased traffic along this route would therefore be counter-productive.

- 4.8 Additional representations will be reported verbally. All representations received are available to view in full upon request.

#### Written Responses received from Statutory Agencies

##### Environment Agency

- 4.9 We have reviewed the revised Flood Risk Assessment (FRA) prepared by AAH Planning, referenced ENV/0705/11FRA, dated June 2011. It doesn't meet the normal standard we expect in terms of the drainage strategy, however, we believe that a workable solution is achievable and we are therefore requesting a specific planning condition for the detailed design of the surface water drainage.

The revised FRA states that the landscaping areas where open sustainable drainage features were proposed is not in fact within the site / ownership extent.

The revised FRA includes calculations for surface water flow balancing. These calculations assume that the increased rainfall intensity due to climate change are applied to the existing situation as well as the proposed development. However, we expect the climate change factor to only be applied to the proposed scheme because almost all the projected climate change is in the future. The method of calculation for sizing the storm water tank therefore underestimates the volume required to some extent.

In the FRA paragraph 6.16, it sets out that the allowable discharge rates will be in line with the Institute of Hydrology Report 124 greenfield run-off rates. These rates and the storage volumes are tabulated for the site in paragraph 6.17. However, each of the "Masterdrain" calculations in the Appendixes are based on a single discharge rate rather than a variable allowable discharge rate. Again the effect is to underestimate the storage volume required.

The FRA lacks a plan showing where the surface water storage is to be located and where the surface water will be discharged, which is a normal requirement. We believe that a workable solution is achievable and in this instance are therefore requesting a specific planning condition for the detailed design of the surface water drainage.

**Groundwater protection and contaminated land:** The Preliminary Geo-Environmental and Geotechnical Ground Investigation Report (Jomas Ltd, August 2011) has been carried out in line with relevant guidance. The recommendations for further investigations at the site to determine any required appropriate remediation works should be carried out and relevant proposals agreed with the LPA before any site clean-up works are commenced.

The relevant planning condition should not be discharged until such time as all relevant works are complete and a closure report submitted and approved by the LPA. Any construction on site should not commence until this approval has been



granted.

The proposal is acceptable subject to the recommended conditions.

#### English Heritage

4.10 Thank you for the e-consultation in respect of the above planning application. It is noted that an archaeological desk-based assessment report prepared by Mr Meager of CgMS Consulting Ltd and dated August 2011 has been submitted as part of the application. Having considered the submitted report I am happy to recommend its approval.

4.11 Further, on balance it does not appear likely that this development scheme would affect archaeology. Any requirement for pre- or post-determination archaeological assessment/ evaluation of the above site can therefore be waived.

#### Thames Water

4.12 No objection subject to recommended conditions and informative.

#### Highways

4.13 Unobjectionable in Principle subject to:-

- Submission of a Construction Vehicle & Logistics Management Plan for approval by the Council prior to the commencement of works on site which should specify how the impacts of construction activities and associated traffic will be managed and mitigated;
- Preparation, adoption and maintenance of a workplace travel plan to minimise car use by employees.
- Lodging a commuted sum (£3,500.00) with the Council to pay for amendments to waiting restrictions in Fordmill Road and Canadian Avenue. This sum may be required to facilitate large vehicle accessibility to the site. If within 3 years following occupation of the new building the amendments are not required the commuted sum may be returned to the applicant.

4.14 Narrative:-

- **The Transport Statement** submitted in support of this application has been prepared in accordance with accepted practice and uses nationally accepted traffic data sets such as TRAVL and TRICS in order to predict traffic generation. It also uses industry standard computer generated vehicle tracking in order to assess manoeuvring capacity and capability at local road junctions and at the site access.
- **Traffic Impact.** The Transport Statement compares peak hour traffic generated by the proposed use of the site with the possible generation from the established use and demonstrates that the increase is modest. Significantly though, previous occupiers of the site generated relatively low levels of traffic during the remainder of the day whereas the proposed user is predicted to generate consistent flows of traffic during those periods outside of the traffic peak hours. However background traffic flows during the remainder of the day are low and the traffic

generated by the application site will have minimal impact on nearby road junctions.

- **Large vehicle access and egress.** Access to the site for the largest delivery vehicles is physically restricted in the immediate vicinity either by width restrictions, traffic calming or tight turning radii so that the only practical route to the site for the largest vehicles is from the A205 West via the Northern section of Canadian Avenue. Egress is easier because large vehicles are able to use the Southern section of Canadian Avenue in order to gain access to the A21 North or South and A205 Eastbound. The London Wide Area Lorry Ban also prohibits vehicles over 16.5 tons from using all roads in Lewisham other than the A205, unless they are granted permits so to do. Such permits will specify the routes that can be exceptionally used and can therefore be formulated to prevent such vehicles accessing or leaving the site through the residential areas immediately to the South of the site.
- **Car Parking.** The amount of car parking provided does not accord with the Council's standards for B8 warehouse use. However given the "Cash and Carry" nature of the proposal, the level of car parking demand is likely to approach low level retail levels. Therefore it is considered that the car parking provision is appropriate and will avoid overspill onto local streets.

#### Environmental Health

- 4.16 **Pollution Control:** No objection subject to recommended conditions regarding hours of operation and noise control. The submitted document 'Contractors Proposal' is acceptable. Therefore there is no need to attach standards condition N10.
- 4.17 **Land Contamination:** The standard condition should be attached requiring further investigations and remediation if necessary.
- 4.19 **Air Quality:** The Air Quality Statement confirms that the reduction in car parking spaces will not result in an overspill into the local area. I am satisfied with the content. The standard condition should be attached regarding control of dust. *NB: Control of dust has been addressed in the submitted 'Contractors Proposal'.*

#### Environmental Sustainability

- 4.20 This seems like an acceptable proposal. The development is compliant with BREEAM and CO2 reduction standards. The only comment is that, given their proximity to Catford Town Centre developments such as this should give more thought to the potential for decentralised energy. The area is identified as one which has the potential for a wider network, eg through the redevelopment of the shopping centre, corporate complex etc. In this instance it's fine because CHP wouldn't be appropriate but for other developments it may well be, in which case we would want to protect the potential for a future connection to a wider network.

#### Landscape/Tree Officer

- 4.21 The amended landscaping details are acceptable.

## Ecologist

- 4.22 Approximately 15 birds boxes could be accommodated on this site. This should be a mix of House Sparrow terraces 28mm x 32mm, entrance hole boxes and open fronted bird boxes. I would also recommend that 5 bat boxes or bricks should be provided, sited towards a tree line or linear feature.

## **5.0 Policy Context**

### Introduction

- 5.1 In considering and determining applications for planning permission the local planning authority must "have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations" (Section 70 (2) of the Town and Country Planning Act 1990). Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes it clear that the determination of planning applications must be made in accordance with the development plan unless material considerations indicate otherwise. This approach is reflected in PPS 1, where, at paragraph 8 (and again at paragraphs 28 and 31), it is confirmed that, where the development plan contains relevant policies, applications for planning permission should be determined in line with the plan, unless material considerations indicate otherwise. The development plan for Lewisham comprises the Core Strategy Development Plan Document (DPD) (adopted in June 2011), those saved policies in the adopted Lewisham UDP (July 2004) that have not been replaced by the Core Strategy and policies in the London Plan (July 2011).

### Planning Policy Statements (PPS) and Planning Policy Guidance (PPG)

- 5.2 A commercial development on a site such as this has a wide-ranging policy context covering many national policy statements. Those of particular significance are:

Planning Policy Statement 1: Delivering Sustainable Development (2005)  
Planning Policy Statement: Planning and Climate Change - Supplement to Planning Policy Statement 1 (2007)  
Planning Policy Statement 4: Planning for Sustainable Economic Growth (2009)  
Planning Policy Statement 5: Planning for the Historic Environment (2010)  
Planning Policy Statement 9: Biodiversity and Geological Conservation (2005)  
Planning Policy Guidance 13: Transport (2011)  
Planning Policy Statement 22: Renewable Energy (2004)  
Planning Policy Statement 23: Planning and Pollution Control (2004)  
Planning Policy Guidance 24: Planning and Noise (1994)  
Planning Policy Statement 25: Development and Flood Risk (2010)

### Ministerial Statement: Planning for Growth (23 March 2011)

- 5.3 The statement sets out that the planning system has a key role to play in rebuilding Britain's economy by ensuring that the sustainable development needed to support economic growth is able to proceed as easily as possible. The Government's expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy.

## Other National Guidance

5.4 The other relevant national guidance is:

By Design: Urban Design in the Planning System - Towards Better Practice (CABE/DETR 2000)

Planning and Access for Disabled People: A Good Practice Guide (ODPM, March 2003)

Safer Places: The Planning System and Crime Prevention (ODPM, April 2004)

## London Plan (July 2011)

5.5 The London Plan policies relevant to this application are:

Policy 1.1 Delivering the strategic vision and objectives for London

Policy 2.1 London in its global, European and United Kingdom context

Policy 2.2 London and the wider metropolitan area

Policy 2.5 Sub-regions

Policy 2.6 Outer London: vision and strategy

Policy 2.7 Outer London: Economy

Policy 2.8 Outer London: transport

Policy 2.13 Opportunity Areas and Intensification Areas

Policy 2.14 Areas for regeneration

Policy 2.15 Town Centres

Policy 2.17 Strategic industrial locations

Policy 4.1 Developing London's economy

Policy 4.4 Managing industrial land and premises

Policy 4.12 Improving opportunities for all

Policy 5.1 Climate change mitigation

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.5 Decentralised energy networks

Policy 5.6 Decentralised energy in development proposals

Policy 5.7 Renewable energy

Policy 5.9 Overheating and cooling

Policy 5.10 Urban greening

Policy 5.11 Green roofs and development site environs

Policy 5.12 Flood risk management

Policy 5.13 Sustainable drainage

Policy 5.14 Water quality and waste water Infrastructure

Policy 5.15 Water use and supplies

Policy 5.16 Waste self-sufficiency

Policy 5.21 Contaminated land

Policy 6.1 Strategic approach

Policy 6.2 Providing public transport capacity and safeguarding land for transport

Policy 6.3 Assessing effects of development on transport capacity

Policy 6.9 Cycling

Policy 6.10 Walking

Policy 6.13 Parking

Policy 6.14 Freight

Policy 7.1 Building London's neighbourhoods and communities

Policy 7.2 An inclusive environment

Policy 7.3 Designing out crime

Policy 7.4 Local character  
Policy 7.5 Public realm  
Policy 7.6 Architecture  
Policy 7.8 Heritage assets and archaeology  
Policy 7.14 Improving air quality  
Policy 7.15 Reducing noise and enhancing soundscapes  
Policy 7.19 Biodiversity and access to nature  
Policy 7.21 Trees and woodlands  
Policy 7.24 Blue Ribbon Network  
Policy 7.28 Restoration of the Blue Ribbon Network  
Policy 7.29 The River Thames  
Policy 7.30 London's canals and other rivers and waterspaces  
Policy 8.1 Implementation  
Policy 8.2 Planning obligations  
Policy 8.3 Community infrastructure levy  
Policy 8.4 Monitoring and review

#### London Plan Supplementary Planning Guidance (SPG)

5.6 The London Plan SPG's relevant to this application are:

Accessible London: Achieving an Inclusive Environment (2004)  
Industrial Capacity (2008)  
Sustainable Design and Construction (2006)

#### London Plan Best Practice Guidance

5.7 The London Plan Best Practice Guidance's relevant to this application are:

Development Plan Policies for Biodiversity (2005)  
Control of dust and emissions from construction and demolition (2006)

#### Core Strategy

5.8 The Core Strategy was adopted by the Council at its meeting on 29 June 2011. The Core Strategy, together with the London Plan and the saved policies of the Unitary Development Plan, is the borough's statutory development plan. The following lists the relevant strategic objectives, spatial policies and cross cutting policies from the Lewisham Core Strategy as they relate to this application:

Spatial Policy 1 Lewisham spatial strategy  
Spatial Policy 5 Areas of stability and managed change  
Core Strategy Policy 3 Strategic industrial locations and local employment locations  
Core Strategy Policy 7 Climate change and adapting to the effects  
Core Strategy Policy 8 Sustainable design and construction and energy efficiency  
Core Strategy Policy 9 Improving local air quality  
Core Strategy Policy 10 Managing and reducing the risk of flooding  
Core Strategy Policy 11 River and waterways network  
Core Strategy Policy 14 Sustainable movement and transport  
Core Strategy Policy 15 High quality design for Lewisham

Core Strategy Policy 16 Conservation areas, heritage assets and the historic environment

Core Strategy Policy 21 Planning obligations

Unitary Development Plan (2004)

5.9 The saved policies of the UDP relevant to this application are:

URB 1 Development Sites and Key Development Sites

URB 3 Urban Design

URB 12 Landscape and Development

URB 13 Trees

ENV.PRO 9 Potentially Polluting Uses

ENV.PRO 10 Contaminated Land

ENV.PRO 11 Noise Generating Development

ENV PRO 17 Management of the Water Supply

HSG 4 Residential Amenity

TRN 28 Motorcycle Parking

Planning Obligations Supplementary Planning Document (January 2011)

5.10 This document sets out guidance and standards relating to the provision of affordable housing within the Borough and provides detailed guidance on the likely type and quantum of financial obligations necessary to mitigate the impacts of different types of development.

**6.0 Planning Considerations**

6.1 The main issues to be considered in respect of this application are:

- a) Principle of Development/Land Use
- b) Design
- c) Highways and Traffic Issues
- e) Noise
- g) Impact on Adjoining Properties
- h) Sustainability and Energy
- i) Ecology and Landscaping
- j) Land Contamination
- k) Flood Risk
- l) Archaeology
- m) Planning Obligations

Principle of Development

6.2 This site is an allocated SIL in the Local Development Framework. Core Strategy Policy 3 seeks to retain such locations for uses within the B Use Class (B1c, B8 and where appropriate B2). This application proposes redevelopment as a B8 warehouse in accordance with the policy designation. The proposal would generate 50-60 jobs (35 full time equivalent) when the business is open and operational. Redevelopment of this site for industrial purposes is supported in principle in accordance with CS Policy 3 and Policy 2.17 Strategic industrial locations.

- 6.3 The proposed cash and carry warehouse is for wholesale only (B8 Use Class) and as such the proposal would not affect the vitality or viability of Catford Centre. If in the future the applicant wished to extend the use to general retail, open to non members this would require a change of use in planning terms to A1. Such an application would need to be considered against relevant national and development plan retail policies. However, in this instance there is no requirement to address retail policies given the designated B8 Use Class. The type of sales will be restricted to wholesale only by way of a planning condition.

### Design

- 6.4 National and local planning policies place considerable emphasis on the importance of achieving high quality design that complements existing development, established townscape and character. LPA's should seek to secure high quality design for all new development but when forming a judgement on design LPA's must consider the extent of development proposed and context, and should not be unduly onerous particularly when dealing with development in an industrial context.
- 6.5 The proposed building will occupy the majority of the site save for the necessary parking, access and vehicle turning areas and an allocated staff seating area. Although of large footprint the proposed building can be adequately accommodated on the site whilst still allowing for the necessary vehicle access arrangements and a pedestrian footpath around the perimeter of the building. It is not unusual for industrial sites to be occupied in this way in order to maximise space and efficiency.
- 6.6 The proposed building is of typical design for its industrial purpose. The design is simple and functional. The height is appropriate given the use of the building and the materials palette is acceptable. The materials will be controlled by condition.
- 6.7 A detailed landscaping proposal has been submitted which will significantly enhance the appearance of the site. Landscaping is discussed in detail in paragraphs 6.32 to 6.38 below.
- 6.8 The building will be visible in the street scene of Fordmill Road and will clearly stand out when read against the backdrop of residential dwellings to the east and west. However, this is to be expected of an industrial building. The site is a designated industrial site and therefore the design approach is acceptable.

### Highways and Traffic Issues

#### *a) Access and Traffic Generation*

- 6.9 The only access into the site is via Fordmill Road. At its northern end Fordmill Road has a junction with Canadian Avenue which offers a link between the A205 and the A21. At its southern end Fordmill Road provides access to a number of routes serving the Bellingham Estate which provide further links to the A21 and A2210 Southend Lane.
- 6.10 The site has a PTAL Rating of 3. There are a number of bus stops within walking distance to the north and south of the site. Catford Bridge and Catford railway stations are within 1km walking distance. The site also lies within a TfL recommended cycle route which provides a direct link for cyclists parallel to the

A212 Catford Hill and A21 Bromley Road offering access to two key highway links; the A2218 Southend Lane and A205 Catford Road. Consequently whilst the PTAL rating is not particularly high there are a number of sustainable transport options available for future employees.

- 6.11 Given the nature of the proposed commercial use customers will arrive by car and van to enable bulk quantities of goods to be purchased. However, it is important for sustainable transport modes to be maximised for staff. In this respect it is appropriate to attach a condition requiring the applicant to prepare a Green Travel Plan which will be subject to review and approval by the Council.
- 6.12 There are two existing access points which will be retained and enhanced to provide a dedicated two way access/egress point for customers and a separate two way access/egress point for delivery vehicles. The Council's Highways Manager has raised no objection to the access improvement works.
- 6.13 This application was accompanied by a Transport Assessment which included a traffic survey undertaken between the hours of 7:30 - 9:30 and 16:00 – 19:00 at the junctions of Fordmill Road/Canadian Avenue and Randlesdown Road/Brookehouse Road. The traffic data shows that the morning peak hour occurred between 08:00 – 09:00 hours and the evening peak between 17:00 – 18:00 hours. The Fordmill Road/Canadian Avenue survey provides a very close approximation of the vehicles flow on the section of Fordmill Road as it passes the site.
- 6.14 There is an existing coach company operating from the site as well as other small businesses. The Transport Assessment submitted seeks to demonstrate the effect of the development using the TRICS database. There are no trip attraction figures for coach companies within TRICS therefore the applicant has used a B8 distribution centre similar in size to the existing unit as a basis for their calculations.
- 6.15 Four similar B8 sites were observed with similar gross floor area to the existing building on this site. the figures were then multiplied to take account of the increase in footprint for the proposed building. In respect of vehicular trip attraction, it is expected that the development will attract approximately 57 two-way car trips in the morning peak hour (which equates to an additional 6 movements in comparison to the potential use of the existing building) and 56 two-way trips in the evening peak hour (a reduction of 4 movements in comparison to the potential use of the existing building). The assessment concludes that the effect of the development during peak hours is therefore considered to be negligible.
- 6.16 The Council's Highway Manager is satisfied with the method used for assessing potential trip generation. It is noted that the Transport Statement compares peak hour traffic generated by the proposed use of the site with the possible generation from the established use and demonstrates that the increase is modest. Significantly though, previous occupiers of the site generated relatively low levels of traffic during the remainder of the day whereas the proposed user is predicted to generate consistent flows of traffic during those periods outside of the traffic peak hours. However background traffic flows during the remainder of the day are low and the traffic generated by the application site will have minimal impact on nearby road junctions.



6.17 Third party concerns have been raised in respect of traffic generation, the suitability of the site to accommodate deliveries by large vehicles and the impact of the development on traffic congestion. The concerns have been duly considered . However, the Councils Highways Manager has confirmed that the proposal is acceptable from a traffic and highway perspective.

*b) Servicing*

6.18 This application was accompanied by a Delivery and Servicing Plan which states that the two existing access points onto Fordmill Road will be widened to provide safe access into the site. All delivery and service vehicles will be able to enter the site for the purpose of parking and/or unloading. As such there is no requirement for vehicles to load/unload on the public highway. Furthermore there is sufficient spaces within the internal access road and yard for delivery vehicles to wait should more than one goods vehicle be on site at once. The layout of the service yard has been designed to accommodate 16.5m long articulated vehicles although such vehicles are not anticipated to visit the site frequently.

6.19 The applicant has stated that there would be an average of 12-17 deliveries per day. The earliest delivery commencing at 8:00 and latest delivery at 18:00 Monday to Friday. The average duration of a delivery is 30-45 minutes depending on the size of the stock. Deliveries will be scheduled with suppliers to either an AM or PM slot to manage distribution and to prevent multiple vehicles being on site any one time. Delivery vehicles will vary in size with a mixture of 12m, 17.5 tonne and 7.5 tonne rigid vehicles being used to supply stock. In addition articulated vehicles and light panel vans will be used on occasions.

6.20 Given the residential nature of Fordmill Road the applicant proposes that all large vehicles will be directed to and from the site via Canadian Avenue. Directions will be provided to suppliers at the time of order. For articulated vehicles the approach route will be via a right turn at the A205 Catford Road/Canadian Avenue junction and vehicles will be encouraged to follow the exit route via Canadian Avenue/A21 Bromley Road.

6.21 The Council's Highway Manager has confirmed that the Delivery and Servicing Plan is acceptable. A Construction and Logistics Management Plan will be secured by condition.

*c) Cycle Parking*

6.22 London Plan Policy 6.9 (and table 6.3) sets out minimum standards for cycle parking provision. For a development of this nature and scale a minimum of 14 spaces should be provided. It is proposed to provide 32 cycle parking spaces within the site. This is acceptable provision which will be secured by a condition to ensure the facilities are secure and covered. It is noted that the application drawings identify 16 spaces that will not be covered. However, the applicant has confirmed (by email) that all spaces will be covered as per the requirements of the condition.

*d) Car Parking*

6.23 It is proposed to provide 68 car parking spaces equivalent to a ratio of 1 space per 99 sqm. Given that the primary function of the proposed building is to allow small business owners to buy stock and supplies there is an operational need for the

proposed level of parking in order to support this distribution function. The peak period for parking at the cash and carry unit has been identified , as 11:00 – 12:00. The assessment shows that there will be 53 arrivals and 56 departures during this time with the average time of a customer trip being approximately 45-60 minutes. The proposed 68 car parking spaces is therefore capable of accommodating the peak demand. The Council's Highway Manager has confirmed that the level of parking is acceptable.

*f) Refuse*

- 6.24 Refuse and recycling storage will take place internally and collections will be managed by a licensed refuse company. A condition will be attached requiring further details of this arrangement.

Impact on Adjoining Properties

- 6.25 Given the dense screening of the site created by the railway embankment to the west it is not considered that the proposed building would have any affect upon properties to the west by way of overshadowing, overbearing impact, loss of light or loss of privacy.
- 6.26 The properties most likely to be affected by the proposal would be 23 Fordmill Road and those properties backing onto the site in Barmeston Road (Nos. 42-58). However, for the reasons demonstrated in this report it is not considered that the proposed development would give rise to unacceptable harm to neighbouring amenity.
- 6.27 It is recognised that the proposed building would be constructed closer to the north-eastern boundary than the existing building thus creating a new relationship to the residential dwellings to the west of the site but this relationship would not be detrimental.
- 6.28 Given the orientation of the proposed building in relation to 23 Fordmill Road, the fact that there is only one window in the flank elevation of the dwelling and taking account of the proposed dense landscaped buffer it is not considered that the occupier of No.23 would experience any significant loss of amenity.
- 6.29 Given the height of the proposed building and the fact that a minimum distance of 20m would be retained between the proposed building and nearest residential façade in Barmeston Road it is not considered that that unacceptable harm would occur. Sufficient distance would be retained to prevent a sense of enclosure or overbearing impact for those properties in Barmeston Road particularly given that the Ravensbourne culvert separates the two sites and a dense landscape buffer is proposed which will help to screen the building. Furthermore it is considered that the proposal would not result in unacceptable overshadowing or loss of light.
- 6.30 Occupiers of properties in Barmeston Road would be able to view the site from their gardens and upper floor windows. However, this would not adversely affect the enjoyment of their property and would be no worse than the excising situation whereby occupiers overlook the ad-hoc businesses operating from the site.
- 6.31 Third party concerns have been raised with regard to noise from the site once operational particularly as the redevelopment of the site is likely to generate more activity than the current businesses that are operating. This site is a long

established and designated industrial site and therefore some level of noise and activity it is to expected and tolerated. However, it is necessary for the LPA to ensure that unacceptable noise and disturbance does not arise.

- 6.32 The applicant has stated proposed opening hours for the business. It is not proposed to open before 08:00 on any day or after 20:00 on weekdays and 16:00 at weekends. Deliveries would also be restricted to within the opening hours. The stated opening hours and delivery times will be controlled by condition. Whilst it is recognised that there will be a lot of activity within the site associated with the comings and goings of customers, unloading deliveries and general operation of the business it is not considered that this would generate an excessive level of noise or disturbance. The stated openings are reasonable and the level of activity would not exceed that of any industrial business operating from this designated site.
- 6.33 The Council's Environmental Health Team has recommend a condition in respect of noise mitigation for plant and equipment.
- 6.34 Third party concerns have been raised in respect of deliveries. It has been suggested that deliveries will need to occur before 08:00 to ensure that there is fresh produce available for when the store opens to customers. This suggestion is unfounded as the applicant has clearly stated their requirements in terms of deliveries. This will be controlled by condition and therefore any breach of that condition would be subject to enforcement action. If in the future deliveries were required before 08:00 a planning application would need to be submitted to vary the condition.
- 6.35 Third party concerns have been raised in respect of noise and disturbance during construction. In this respect, this application was accompanied by a document titled 'Contractors Proposal'. This document identifies the contractors responsible for construction of the proposed building. It is stated that construction hours would be 08:00 – 18:00 Monday to Friday and 08:00 – 13:00 Saturday. No construction will take place on Sundays or Public Holidays. In addition a 30 minute start up period will be permitted 07:30 – 08:00 to allow contractors staff to arrive at the site and prepare for construction works. The stated hours of construction are reasonable and can be controlled by condition.
- 6.36 A certain level of noise and disturbance is to be anticipated during any period of construction. However, such disturbance is for a limited period only and should therefore be tolerated. Subject to the control of hours of construction as set out above it is not considered that redevelopment of the site would cause unacceptable noise or disturbance to neighbouring properties in the long term.
- 6.37 The document also identified general housekeeping rules for construction covering issues such as storage arrangements for materials, refuse storage arrangements, fencing and hoarding, lighting, access and loading, site security, clearance of site on completion, emergency contacts and procedures, health and safety, measures to prevent traffic congestion, measures to control dust and mud, site access and vehicle movements, disposal of waste and contaminated material, measures to control air pollution and protection of drainage. This document has been reviewed by the Environmental Health Team and is deemed to be acceptable with no further information required in this respect by way of conditions.

- 6.38 Overall it is not considered that the proposal would cause significant harm to neighbouring amenity. The proposal therefore complies with Policy HSG4 of the UDP.

#### Sustainability and Energy

- 6.39 In accordance with London Plan Policy 5.2 this application was accompanied by an Energy Statement. The energy strategy for the site has been developed in accordance with the Mayors Energy Strategy/Hierarchy in order to meet where possible; and exceed policy requirements for mitigating the impacts of climate change.
- 6.40 The statement identifies service requirements for heating, hot water and lighting. Consideration was given to the feasibility of a CHP based heating system but this was not considered appropriate as there is not enough constant annual heating demand to match the electricity demand for economical and carbon efficient use of the system. Furthermore, at this time there are no available district heating systems that can serve the development for heating. Consequently a gas water heating system has been selected. An energy efficient extract only ventilation system is proposed for the office area, the remainder of the building will be naturally ventilated. Low energy light fittings will be installed, the lighting will be controlled using presence-detecting controls, with daylight cut-off controls where appropriate. It is intended to use the natural daylight through skylights and use light sensors to activate and deactivate artificial lighting. The building will be highly insulated and low u-value fenestration will be installed.
- 6.41 The Energy Statement shows that energy efficiency measures will provide a 38% reduction in CO<sup>2</sup> emissions over the baseline figure (Part L of 2010 Building Regulations). Further reduction of CO<sup>2</sup> emissions up to 52% is obtained via addition of renewable energy measures, namely photovoltaic's which will be positioned on the roof of the proposed building (proposed area of 642 sqm).
- 6.42 This application was accompanied by a BREEAM Pre Assessment document which demonstrates that the building would be capable of meeting an 'Excellent' BREEAM Rating.
- 6.43 The Council's Sustainability Officer has confirmed that the proposal is acceptable as it meets London Plan and Core Strategy Policy objectives.

#### *b) Living Roofs*

- 6.44 The proposed building will not incorporate a living roof as a large area of the roof will be utilised for skylights as the principal form of natural light and ventilation into the building. For a building of this purpose it is not practical to have large areas of fenestration in the elevations and therefore it is a necessity for a large area of the roof to incorporate skylights. Clearly this would conflict with the provision of a living roof system. Given the nature of the proposed use and the fact that the development would meet an 'Excellent' BREEAM rating and reduce carbon emissions by 52% over Building Regulations (with the use of renewable energy) the lack of living roof provision is considered to be acceptable in this instance.

### *c) Sustainable Urban Drainage Systems*

- 6.45 This application was accompanied by a revised Flood Risk Assessment setting out measures to deal with surface water drainage. The stated measures were not considered to be fully acceptable by the Environment Agency. However, it is felt that this matter could be satisfactorily resolved by way of the conditions recommend by the Environment Agency.
- 6.46 Overall the proposal satisfactorily addresses London Plan and Core Strategy Policies which seek to mitigate the impacts of climate change.

### Ecology and Landscaping

- 6.47 The existing site comprises large areas of hard standing, soft landscaping is scarce and restricted to the perimeters of the site. The northeast boundary of the site comprises an existing mature, landscape buffer. This buffer is overgrown and poorly maintained. There is evidence of Japanese Knotweed and other perennial weeds. Planting on other boundaries of the site are also poorly maintained.
- 6.48 The railway embankment to the west of the site is completely awash with Japanese Knotweed. This embankment creates a physical and visual buffer to the site which prevents the site being visible from Tibbenham Place.
- 6.49 As part of the development proposal it is intended to remove the Japanese Knotweed, create a new landscaped front boundary and enhance the existing landscape buffer along the northeast boundary of the site. Additional tree planting will be introduced internally within the site with the aim of bisecting the car park and adding a further buffer between the proposed building and residential development to the east.
- 6.50 A detailed landscape proposal has been submitted. The following landscaping is proposed:-
- Retain the existing Willow trees along the eastern boundary.
  - Plant additional Pine trees and Evergreen shrubs within the eastern landscape buffer. This will ensure year round colour and interest and will help to screen the new building when viewed from properties in Barmeston and Fordmill Road.
  - Low level ornamental shrubs will be planted around the car parking bays.
  - New London Plane trees will be planted internally within the car park.
  - Beech and Birch trees will be planted along the northern boundary together with ornamental shrub planting which will provide an attractive entrance into the site and a landscape buffer between the road and the staff seating area.
  - Species and numbers of plants and bulbs have been identified.
  - Hard landscaping materials have been identified.
- 6.51 The landscape proposal has been subject to discussion with the Council's Landscape Officer. The original proposal was amended to incorporate more tree planting, a greater variety of plants and bulbs and to ensure an appropriate management plan for the eradication of Japanese Knotweed. The Council's Landscape Officer has confirmed that the proposals are acceptable for this site.

- 6.52 Opportunities for biodiversity on the site will be enhanced by virtue of the proposed landscaping particularly as it is proposed to provide 15 bird boxes and 5 bat boxes within trees along the north-eastern boundary.
- 6.53 The proposed landscaping will significantly enhance the appearance of the site whilst helping to further screen the proposed building from adjacent residential dwellings. The new trees will make a valuable contribution to amenity as well as providing opportunities for biodiversity adjacent to the River Ravensbourne. Overall the landscaping proposals are deemed to be acceptable. Conditions will be attached to control implementation and maintenance of the landscaping and ecology features.

#### Land Contamination

- 6.54 This Application was accompanied by a Preliminary Ground Investigation Report prepared by a suitably qualified consultant. The assessment outlines the investigative work undertaken so far and makes various recommendations for future investigation and if necessary remediation of the site. The Council's Land Contamination Officer has confirmed that that report submitted at this stage is acceptable to enable approval of the scheme but further contamination investigation/remediation is required. This can be controlled by way of the recommended condition.
- 6.56 The Environment Agency has also requested further ground investigation work by way of a recommended condition.

#### Flood Risk

- 6.57 This site lies within a Flood Zone 2 and is bounded by the River Ravensbourne on its north and eastern boundaries. This application was accompanied by a Flood Risk Assessment. The initial assessment sets out historical flooding incidents, predicted flood modelling for the site, proposed drainage techniques and mitigation measures. The Environment Agency reviewed the assessment and advised that it was not fit for purpose. The assessment failed to fully demonstrate the aim to utilise sustainable urban drainage systems (SUDS) and manage surface water run-off as close to its source as possible. It failed to fully demonstrate the aim to achieve Greenfield run-off rates and fully demonstrate no increase in run off volumes resulting from the development.
- 6.58 In response to the comments raised by the Environment Agency the applicant submitted a further Flood Risk Assessment. The revised FRA was still found to be insufficient to fully address surface water drainage. However, the Environment Agency has recommended an appropriate pre commencement condition to address issues associated with flood risk.

#### Archaeology

- 6.59 This site is located within an Area of Archaeological Priority. This application was accompanied by a Desk Based Assessment which concludes that the site has a moderate potential for Mesolithic, Neolithic, Bronze and Iron Age periods of human activity. However, past post-depositional impacts have been severe with several phases of construction occurring at the site during the twentieth century. With this in mind the assessment confirms that no further archaeological mitigation measures are recommended.

- 6.60 English Heritage has reviewed the assessment and agree that no further archaeological work is required.

#### Planning Obligations

- 6.61 Circular 05/05 states that in dealing with planning applications, local planning authorities consider each on its merits and reach a decision based on whether the application accords with the relevant development plan, unless material considerations indicate otherwise. Where applications do not meet these requirements, they may be refused. However, in some instances, it may be possible to make acceptable development proposals which might otherwise be unacceptable, through the use of planning conditions or, where this is not possible, through planning obligations.
- 6.62 Paragraph 122 of the Community Infrastructure Levy Regulations (April 2010), sets out that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is –
- (a) Necessary to make the development acceptable
  - (b) Directly related to the development; and
  - (c) Fairly and reasonably related in scale and kind to the development
- 6.63 London Plan policy 8.2 (Planning Obligations) and Core Strategy Policy CS21 (Planning Obligations) together with the Council's Adopted Planning Obligations SPD set out the policy context for considering planning obligations. Whether a development makes appropriate provision for, or contribution towards, requirements that are made necessary by, and are related to, the proposed development will be a material consideration relevant to the planning application being considered. Negotiations should seek a contribution towards the full cost of all such provision that is fairly and reasonably related in scale and in kind to the proposed development and its impact on the wider area. Planning obligations should reflect strategic and local needs.
- 6.64 In accordance with the statutory and policy context, S106 matters were negotiated with the applicant as part of the pre application discussions. The applicant has provided a planning obligations statement with this application outlining the obligations that they consider are necessary to mitigate the impacts of the development taking account of the pre application advice given by Officer's.
- 6.65 For this particular development the following obligations are considered necessary to mitigate the impact of the development:-

**Transport, Environmental Protection and Public Realm** - As part of the development proposal the applicant is intending to undertake physical improvements to the existing access points from Fordmill Road. Having considered the submitted Transport Assessment the Highways Manager considers the only additional measure required to mitigate the impact of the development in highway terms would be a commuted sum of £3,500.00 to be lodged with the Council to pay for amendments to waiting restrictions in Fordmill Road and Canadian Avenue. This sum may be required to facilitate large vehicle accessibility to the site. If within 3 years following the occupation of the new

building the amendments are not required the commuted sum may be returned to the applicant.

A commuted sum of £3,500.00 will be secured by way of a S106 legal agreement. The sum should be paid on commencement of development.

**Employment Training** – When calculating an appropriate contribution towards employment training, the starting point for the LPA is to calculate the overall increase in floor space being created by the development (3692 sqm). The LPA use an employment ratio from the English Partnerships Employment Density Calculation to calculate the number of employees that would usually operate within the specified floor area. This document identifies employment density for wholesale retail distribution, at a ratio of 90 sqm per job. Consequently the increased floor area of 3692sqm would amount to 41 jobs which would generate an employment contribution of £20,500. This is a starting figure for negotiation with the applicant.

In this instance the applicant has advised that the equivalent of 35 full time jobs would be created at Catford. Consequently basing the employment training calculation on actual jobs to be created locally this would amount to £17,500. This is considered to be an appropriate contribution to mitigate the impact of the proposed development.

A employment and training contribution of £17,500.00 will be secured by way of a S106 agreement. The sum will be paid on commencement of development.

**Local Labour** – In accordance with the Council's adopted SPD the applicant has agreed to utilise a minimum of 50% local labour during construction. This will be secured through a S106 legal agreement.

**Open Space/Leisure** – this site lies in an area of open space deficiency. In response to this, the application proposes provision of onsite facilities for staff to use during break times. An external seating area is proposed which will allow seating for 18 people at any one time. The seating area will be well landscaped and will provide a much needed staff facility negating the need for staff to be able to access offsite external amenity facilities during break times. With this in mind Officers do not consider it necessary for a contribution to be secured for improvements to open space or local leisure facilities. The onsite facility will be secured by condition.

**Biodiversity** – This application proposes to provide 15 bird boxes and 5 bat boxes as part of the detailed landscaping of the site. No further measures are required to mitigate the impact of the development in this respect.

**Costs** - Meeting the Council's legal, professional and monitoring costs associated with the drafting, finalising and monitoring of the Agreement. This will be secured through the S106 agreement.

- 6.66 Officers consider that the obligations outlined above are appropriate and necessary in order to mitigate the impacts of the development and make the development acceptable in planning terms. Officers are satisfied the proposed obligations meet the three legal tests as set out in the Community Infrastructure Levy Regulations (April 2010).



## **7.0 Conclusion**

- 7.1 The proposal represents an efficient and effective use of this Brownfield site, resulting in the retention of an important employment site and making a valuable contribution to employment within the Borough, in accordance with London Plan Policies 2.17 Strategic industrial locations, 4.1 Developing London's economy, 4.4 Managing industrial land and premises and CS Policy 3 Strategic industrial locations and local employment locations.
- 7.2 The site is suitable for the type and amount of development proposed. The proposed building is fit for purpose and acceptable in design terms. The visual amenity of the site and character of the area will be enhanced as a result of the proposed landscaping scheme. Subject to conditions to control the development in detail, the proposal would not adversely affect the character or amenity of the area and would not harm neighbouring amenity. Consequently the proposal complies with London Plan Policies 7.1 Building London's neighbourhoods and communities, 7.2 An inclusive environment, 7.3 Designing out crime, 7.4 Local character, 7.5 Public realm, 7.6 Architecture, Core Strategy Spatial Policy 1 Lewisham spatial strategy, Spatial Policy 5 Areas of stability and managed change, Core Strategy Policy 15 High quality design for Lewisham, UDP Policies URB 3 Urban Design, URB 12 Landscape and Development , URB 13 Trees and HSG 4 Residential Amenity
- 7.3 The traffic impacts of the development have been satisfactorily addressed in the application, relevant recommended conditions and S106 Provision. Consequently the proposal complies with London Plan Policies 6.2 Providing public transport capacity and safeguarding land for transport, 6.3 Assessing effects of development on transport capacity, 6.9 Cycling, 6.10 Walking, 6.13 Parking, 6.14 Freight and Core Strategy Policy 14 Sustainable movement and transport.
- 7.4 Issues of sustainability, drainage and land contamination have been satisfactorily addressed within the application, relevant recommended conditions and S106 provision. Consequently the proposal complies with London Plan Policies 5.1 Climate change mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction, 5.5 Decentralised energy networks, 5.6 Decentralised energy in development proposals, 5.7 Renewable energy, 5.9 Overheating and cooling , 5.10 Urban greening, 5.12 Flood risk management, 5.13 Sustainable drainage, 5.14 Water quality and wastewater Infrastructure, 5.15 Water use and supplies, Waste self-sufficiency, 5.21 Contaminated land, Core Strategy Policy 7 Climate change and adapting to the effects, Core Strategy Policy 8 Sustainable design and construction and energy efficiency and Core Strategy Policy 10 Managing and reducing the risk of flooding, Core Strategy Policy 11 River and waterways network, UDP Policies ENV.PRO 10 Contaminated Land, ENV PRO 17 Management of the Water Supply and HSG 4 Residential Amenity

## **8.0 Summary of Reasons for Grant of Planning Permission**

- 8.1 The decision to recommend the grant of planning permission has been taken, having regard to the policies and proposals set out in the London Plan (July 2011), saved policies in the Council's adopted Unitary Development Plan (2004) and the adopted Local Development Framework (Core Strategy 2011). The Local Planning Authority has further had regard to the Local Planning Authority's

Adopted Planning Obligations Supplementary Planning Document (January 2011), Government Planning Policy Guidance and Statements, and all other material considerations, the obligations that are to be entered into in the planning agreement in connection with the development and the conditions to be imposed on the permission. The Local Planning Authority considers that:

- (1) The proposal represents an efficient and effective use of this Brownfield site, resulting in the retention of an important employment site and making a valuable contribution to employment within the Borough, in accordance with London Plan Policies 2.17 Strategic industrial locations, 4.1 Developing London's economy, 4.4 Managing industrial land and premises and CS Policy 3 Strategic industrial locations and local employment locations.
- (2) The site is suitable for the type and amount of development proposed. The proposed building is fit for purpose and acceptable in design terms. The visual amenity of the site and character of the area will be enhanced as a result of the proposed landscaping scheme. Subject to conditions to control the development in detail, the proposal would not adversely affect the character or amenity of the area and would not harm neighbouring amenity. Consequently the proposal complies with London Plan Policies 7.1 Building London's neighbourhoods and communities, 7.2 An inclusive environment, 7.3 Designing out crime, 7.4 Local character, 7.5 Public realm, 7.6 Architecture, Core Strategy Spatial Policy 1 Lewisham spatial strategy, Spatial Policy 5 Areas of stability and managed change, Core Strategy Policy 15 High quality design for Lewisham, UDP Policies URB 3 Urban Design, URB 12 Landscape and Development , URB 13 Trees and HSG 4 Residential Amenity
- (3) The traffic impacts of the development have been satisfactorily addressed in the application, relevant recommended conditions and S106 Provision. Consequently the proposal complies with London Plan Policies 6.2 Providing public transport capacity and safeguarding land for transport, 6.3 Assessing effects of development on transport capacity, 6.9 Cycling, 6.10 Walking, 6.13 Parking, 6.14 Freight and Core Strategy Policy 14 Sustainable movement and transport.
- (4) Issues of sustainability, drainage and land contamination have been satisfactorily addressed within the application, relevant recommended conditions and S106 provision. Consequently the proposal complies with London Plan Policies 5.1 Climate change mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction, 5.5 Decentralised energy networks, 5.6 Decentralised energy in development proposals, 5.7 Renewable energy, 5.9 Overheating and cooling , 5.10 Urban greening, 5.12 Flood risk management, 5.13 Sustainable drainage, 5.14 Water quality and wastewater Infrastructure, 5.15 Water use and supplies, Waste self-sufficiency, 5.21 Contaminated land, Core Strategy Policy 7 Climate change and adapting to the effects, Core Strategy Policy 8 Sustainable design and construction and energy efficiency and Core Strategy Policy 10 Managing and reducing the risk of flooding, Core Strategy Policy 11 River and waterways network, UDP Policies ENV.PRO 10 Contaminated Land and ENV PRO 17 Management of the Water Supply.

## 9.0 RECOMMENDATIONS

### 9.1 RECOMMENDATION (A)

To agree the proposals and authorise the Head of Law to complete a legal agreement under Section 106 of the 1990 Act (and other appropriate powers) to cover the following principal matters:-

**Transport, Environmental Protection and Public Realm** - As part of the development proposal the applicant is intending to undertake physical improvements to the existing access points from Fordmill Road. Having considered the submitted Transport Assessment the Highways Manager considers the only additional measure required to mitigate the impact of the development in highway terms would be a commuted sum of £3,500.00 to be lodged with the Council to pay for amendments to waiting restrictions in Fordmill Road and Canadian Avenue. This sum may be required to facilitate large vehicle accessibility to the site. If within 3 years following the occupation of the new building the amendments are not required the commuted sum may be returned to the applicant.

A commuted sum of £3,500.00 will be secured by way of a S106 legal agreement. The sum should be paid on commencement of development.

**Employment Training** – When calculating an appropriate contribution towards employment training, the starting point for the LPA is to calculate the overall increase in floor space being created by the development (3692 sqm). The LPA use an employment ratio from the English Partnerships Employment Density Calculation to calculate the number of employees that would usually operate within the specified floor area. This document identifies employment density for wholesale retail distribution, at a ratio of 90 sqm per job. Consequently the increased floor area of 3692sqm would amount to 41 jobs which would generate an employment contribution of £20,500. This is a starting figure for negotiation with the applicant.

In this instance the applicant has advised that the equivalent of 35 full time jobs would be created at Catford. Consequently basing the employment training calculation on actual jobs to be created locally this would amount to £17,500. This is considered to be an appropriate contribution to mitigate the impact of the proposed development.

A employment and training contribution of £17,500.00 will be secured by way of a S106 agreement. The sum will be paid on commencement of development.

**Local Labour** – In accordance with the Council's adopted SPD the applicant has agreed to utilise a minimum of 50% local labour during construction. This will be secured through a S106 legal agreement.

**Open Space/Leisure** – this site lies in an area of open space deficiency. In response to this, the application proposes provision of onsite facilities for staff to use during break times. An external seating area is proposed which will allow seating for 18 people at any one time. The seating area will be well landscaped and will provide a much needed staff facility negating the need for staff to be able to access offsite external amenity facilities during break times. With this in mind Officers do not consider it necessary for a contribution to be secured for

improvements to open space or local leisure facilities. The onsite facility will be secured by condition.

**Biodiversity** – This application proposes to provide 15 bird boxes and 5 bat boxes as part of the detailed landscaping of the site. No further measures are required to mitigate the impact of the development in this respect.

**Costs** - Meeting the Council's legal, professional and monitoring costs associated with the drafting, finalising and monitoring of the Agreement. This will be secured through the S106 agreement.

## 9.2 **RECOMMENDATION (B)**

Upon the completion of a satisfactory Section 106 Agreement, **by the 20<sup>th</sup> October 2011** in relation to the matters set out above, authorise the Head of Planning to Grant Permission subject to the following conditions:-

Standard Conditions 1 and 2

### **Additional Conditions**

1. The premises hereby approved shall be used as a wholesale cash and carry warehouse only (Use Class B8) and not for any other purpose including cash and carry sales to the general public.

#### **Reason**

In order to ensure that the site remains in genuine industrial use and to protect the vitality and viability of designated shopping centres in the Borough in accordance with Core Strategy Policy 3: Strategic industrial locations and local employment locations and Core Strategy Policy 6: Retail hierarchy and location of retail development.

2. No goods, merchandise, material or thing of any description shall be stacked or stored on any part of the site not occupied by buildings.

#### **Reason**

In the interests of visual and residential amenity in accordance with Core Strategy Policy 15: High quality design in Lewisham and Policies URB3: Urban Design and HSG4: Residential Amenity in the adopted Unitary Development Plan (July 2004).

3. (i) Unless minor variations are otherwise approved in writing by the local planning authority, the development shall be carried out in strict accordance with the BREEAM Preliminary Assessment and the Energy Statement submitted and approved as part of this application. The building shall achieve carbon emissions reduction of 52% over Part L of the Building Regulations, which shall include the provision of photovoltaic panels to achieve 21% of onsite renewable energy. All of the sustainability measures as detailed the BREEAM Preliminary Assessment and Energy Statements shall be provided in full.

(ii) All measures agreed under part (i) shall be provided in full prior to occupation of the development hereby approved and shall be retained in perpetuity.

(iii) Within three months of the buildings being brought into use, evidence shall be submitted to demonstrate full compliance with the requirements of parts (i) and (ii), which shall include evidence of the carbon emission savings and renewable energy targets and photographic evidence of all sustainability features in situ.

#### Reason

To ensure the development achieves the maximum possible in respect of energy and carbon emissions and to comply with Policies 5.1 Climate change mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction, 5.7 Renewable energy, 5.15 Water use and supplies, Waste self-sufficiency of the London Plan (July 2011) and Core Strategy Policy 7 Climate change and adapting to the effects, Core Strategy and Policy 8 Sustainable design and construction and energy efficiency (LDF 2011).

4. (i) The building hereby approved shall achieve a BREEAM rating of minimum 'Excellent'.

(ii) Prior to commencement of development a Design Stage certificate (prepared by a qualified assessor) shall be submitted to demonstrate compliance with (i)

(iii) Within three months of the building being brought into use, evidence shall be submitted to demonstrate full compliance with the requirements of this condition, which shall include a Post Construction BREEAM Certificate (prepared by a qualified assessor).

#### Reason

To ensure the development achieves the maximum possible in respect of energy and carbon emissions and to comply with Policies 5.1 Climate change mitigation, 5.2 Minimising carbon dioxide emissions, 5.3 Sustainable design and construction, 5.7 Renewable energy, 5.15 Water use and supplies, Waste self-sufficiency of the London Plan (July 2011) and Core Strategy Policy 7 Climate change and adapting to the effects, Core Strategy and Policy 8 Sustainable design and construction and energy efficiency (LDF 2011).

5. (i) No occupation/use of the development hereby approved shall take place until such time as a workplace Travel Plan, in accordance with Transport for London's relevant Best Practice Guide for Travel Plans has been submitted to and approved in writing by the local planning authority. The development shall operate in full accordance with all measures identified within the Travel Plan from first occupation.

(ii) The Travel Plan shall specify initiatives to be adopted by the new development to encourage access to the site by a variety of non-car means, shall set targets and shall specify a monitoring and review mechanism to ensure compliance with the Travel Plan objectives.

(iii) Within the timeframe specified by (i) and (ii), evidence shall be submitted to demonstrate compliance with the monitoring and review mechanisms agreed under parts (i) and (ii).

#### Reason

In order that both the local planning authority and highway authority may be satisfied as to the practicality, viability and sustainability of the Travel Plan for the

site and to comply with Core Strategy Policy 14 Sustainable movement and transport (LDF 2011).

6. The building hereby approved shall be finished in those materials identified on Drawing No. 027/PL/250 unless otherwise agreed in writing by the local planning authority.

Reason

To ensure that the development is of a satisfactorily high design standard to ensure that it makes a positive contribution to the appearance of the locality and to comply with Policy URB 3 Urban Design in the adopted Unitary Development Plan (July 2004) and Core Strategy Policy 15 High quality design for Lewisham (LDF 2011).

7. All soft landscaping, hard surfacing, treatment of Japanese Knotweed and installation of 15 Bird boxes and 5 Bat boxes shall be carried out in accordance with the details identified on drawing no. 11\_017\_D002\_A hereby approved, unless otherwise agreed in writing by the local planning authority. All soft landscaping, hard surfacing, bird and bat boxes shall be provided prior to the buildings being brought into use. Any trees or plants which within a period of 5 years from the completion of the whole development die, are removed, are displaced or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species, unless the local planning authority has given written consent to any minor variation.

Reason

To ensure that the details of these arrangements are satisfactory and to comply with Policy URB 12 Landscape and Development in the adopted Unitary Development Plan (July 2004) and Policy 7.19 Biodiversity and access to nature of the London Plan (July 2011).

8. No development shall commence on site until adequate steps have been taken in accordance with Section 8 of BS 5837 Trees to safeguard all trees to be retained on site against damage prior to or during building works, including the erection of fencing. These fences shall be erected to the extent of the crown spread of the trees, or where circumstances prevent this, to a minimum radius of 2 metres from the trunk of the tree and such protection shall be retained until the development has been completed. No excavations, site works, trenches or channels shall be cut, or pipes or services laid in such a way as to cause damage to the root structure of the trees.

Reason

To safeguard the health and safety of trees during building operations and the visual amenities of the area generally and to comply with Policies URB 3 Urban Design, URB 12 Landscape and Development and URB 13 Trees in the adopted Unitary Development Plan (July 2004).

9. (i) Details of all proposed boundary treatments, means of enclosure and gates shall be submitted to and approved in writing by the local planning authority prior to commencement of development. This shall include detailed drawings at a scale of 1:5 or 1:10.

(ii) The approved boundary treatments, means of enclosure and gates shall be implemented before use of any part of the buildings is commenced.

Reason

To ensure that the development is of a satisfactorily high design standard to ensure that it makes a positive contribution to the appearance of the locality and to comply with Policy URB 3 Urban Design in the adopted Unitary Development Plan (July 2004).

10. A minimum of 32 secure and dry cycle parking spaces shall be provided within the development as indicated on the plans hereby approved. The full details shall be submitted to and approved in writing by the local planning authority prior to commencement of development. No part of the building shall be used until the cycle parking spaces have been provided and made available for use. Thereafter such spaces shall be retained and used only as cycle parking.

Reason

In order to ensure adequate provision for cycle parking and to comply with Policy 6.9 Cycling of the London Plan (July 2011) and Core Strategy Policy 14 Sustainable movement and transport (LDF 2011).

11. Details of refuse and recycling storage and collection shall be submitted to and approved in writing by the local planning authority and made available before any part of the building is occupied or brought into use.

Reason

In order that the local planning authority may be satisfied with the provisions for refuse collection in the scheme and to comply with Core Strategy Policy 14 Sustainable movement and transport (LDF 2011).

12. No development shall commence until a Construction Logistics Management Plan has been submitted to and approved in writing by the local planning authority. The plan shall demonstrate the following:-

- (i) Rationalise routes to and from the site.
- (ii) Provide full details of the number and time of construction vehicle trips to the site, with the aim of reducing the impact of construction vehicle activity.

The measures specified in the approved details shall be implemented prior to commencement of development and shall be adhered to during the period of construction.

Reason

In order to ensure satisfactory vehicle management and to comply with Core Strategy Policy 14 Sustainable movement and transport (LDF 2011).

13. No deliveries in connection with construction works shall be taken at or despatched from the site and no work shall take place on the site other than between the hours of 08:00 and 18:00 on Mondays to Fridays and 08:00 and 13:00 on Saturdays and not at all on Sundays or Public Holidays.

### Reason

In order to safeguard the amenities of adjoining occupants at unsociable periods and to comply with Policies ENV.PRO 9 Potentially Polluting Uses, ENV.PRO 11 Noise Generating Development and HSG 4 Residential Amenity in the adopted Unitary Development Plan (July 2004).

14. The premises shall not be open for customer business and no deliveries shall be taken at or despatched from the site outside the hours of 08:00 and 20:00 on Mondays to Fridays, 09:00 and 16:00 on Saturdays or 09:00 and 15:00 on Sundays and Public Holidays.

### Reason

In order to safeguard the amenities of adjoining occupants at unsociable periods and to comply with Policies ENV.PRO 9 Potentially Polluting Uses, ENV.PRO 11 Noise Generating Development and HSG 4 Residential Amenity in the adopted Unitary Development Plan (July 2004).

15. The staff seating area identified on drawing no. 11\_017\_D002\_A including the provision of seating for 18 persons shall be made available prior to the building hereby approved being brought into use and shall be retained in perpetuity.

### Reason

To ensure that adequate amenity provision is made for staff in this area of open space deficiency in accordance with the Lewisham Council's SPD: Planning Obligations, Policy 8.2 Planning obligations of the London Plan (July 2011) and Core Strategy Policy 21: Planning Obligations (LDF June 2011).

16. (i) The rating level of the noise emitted from fixed plant and machinery on the site shall be 5dB below the existing background level at any time, as measured at the façade of any noise sensitive property. The measurements and assessments shall be made according to BS4142:1997.

(ii) Development shall not commence until details of the scheme complying with paragraph (i) of this condition have been submitted to and approved in writing by the local planning authority within three months of commencement of development.

(iii) The development shall be occupied until the scheme approved pursuant to paragraph (ii) of this condition has been implemented in its entirety. Thereafter the scheme shall be maintained in perpetuity.

### Reason

To ensure a satisfactory environment for the occupiers of the development and so as to comply with Policy ENV.PRO11 (Noise Generating Development) in the adopted Unitary Development Plan (July 2004).

17. C10 and C10 R

18. H02 and H02 R

19. H08 and H08R

20. H10 and H10R



## 21. N12 and N12R

22. No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with the relevant water or sewerage undertaker. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

### Reason

The proposed works will be in close proximity to underground water and sewerage utility infrastructure. Piling has the potential to impact on local underground water and sewerage utility infrastructure. Approval is required in accordance with Core Strategy Policy 10 Managing and reducing the risk of flooding (LDF June 2011).

23. (i) Development shall not begin until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

(ii) The scheme shall also include:

- Details of how the scheme shall be maintained and managed after completion;
- Calculations to demonstrate that the peak off-site discharge rate shall be limited during the critical duration storm events to 5 litres per second during the mean annual flood, 12 litres per second during the 1 in 30-year event, and 17 litres per second during the 1 in 100-year event factored to take account of a 20% increase in rainfall intensity due to climate change;
- Calculations to demonstrate that the surface water control works will prevent off-site overland flow or flooding affecting buildings during events up to the critical duration 1 in 100-year event factored to take account of climate change.

### Reason

To prevent the increased risk of flooding, to improve and protect water quality, and ensure future maintenance of the surface water drainage system, as the Flood Risk Assessment submitted has not provided a fully acceptable drainage strategy in accordance with Core Strategy Policy 10 Managing and reducing the risk of flooding (LDF June 2011).

24. Prior to the commencement of the development approved by this planning permission, the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority in conjunction with the Environment Agency:

1. A preliminary risk assessment which has identified all previous uses; potential contaminants associated with those uses; a conceptual model of the site

indicating sources, pathways and receptors; potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

### Reason

To ensure development is consistent with PPS 23: Planning and Pollution Control. The site is located in a highly sensitive area with regard to controlled waters, in that it is located within Source Protection Zone 1 for a public water supply.

### Informatives

1. Construction

2. Assessment of the scheme for Condition 16 shall be undertaken by a suitably qualified acoustic consultant.

3. The applicant is advised that in respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

4. In respect of Condition 22 the applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.

5. The applicant is advised that where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Groundwater permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 8507 4890 or by emailing [wwqriskmanagement@thameswater.co.uk](mailto:wwqriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality). Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

6. The applicant is advised that Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

7. Under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws 1981, the prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8 metres of the brink of the River Ravensbourne main river. Contact Ian Blackburn on 0207 091 4013 for further details.