



Planning Committee B

**Report title: BURNT ASH WORKS, HOLME LACEY ROAD, LONDON,
SE12 0HR**

Date: 11 November 2021

Key decision: No.

Class: Part 1

Ward(s) affected: Lee Green

Contributors: Samuel James

Outline and recommendations

This report sets out the Officer's recommendation of approval for the above proposal. The report has been brought before Committee for a decision due to the submission of five objections from local residents.

Application details

Application reference number(s): DC/21/119025

Application Date: 21 October 2020

Applicant: Travis Perkins

Proposal: Demolition of Travis Perkins, Holme Lacey Road SE12 and former car showroom 2 Burnt Ash Hill SE12 and the construction of a building for use as a builders merchants (sui generis) with service yard, car parking, landscaping and associated works.

Background Papers:

- (1) Submission Drawings
- (2) Submission technical reports and documents
- (3) Internal consultee responses
- (4) Statutory consultee responses

Designation: PTAL 3

Screening: N/A

1 SITE AND CONTEXT

Site description and current use

- 1 The application site relates to a large, roughly L-shaped plot of land located on the western side of Burnt Ash Hill and on the northern side of Holme Lacey Road. The site is currently split into two separate planning units:
- 2 The Western part of the site is within the Manor Lane Local Employment Location (LEL), and is currently in use as a builder's merchant (Sui Generis) operated by Travis Perkins. A large warehouse building sits in the northern part of the site, and the southern part is used for access, parking and loading/unloading. Access to the site is from the south adjacent to No.2 Holme Lacey Road.
- 3 The Eastern part of the site is in use as a car showroom (Sui Generis), and currently comprises a part single, part two storey building, in addition to some smaller associated outbuildings and car parking. Access to the site is gained from Holme Lacey Road, and Burnt Ash Hill.

Character of area

- 4 The area immediately to the south of the application site is predominately residential in character, comprising a three storey block of flats and groups of two storey, terraced dwellinghouses. Immediately to the west of the site are terraced houses on Holme Lacey Road, as well as the industrial uses of the Manor Lane LEL to the north of these.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 5 On the opposite side of Burnt Ash Hill the buildings are three storeys and terraced in nature, with commercial/retail units on the ground floors and residential units above. To the north of the site there is a motorcycle shop. The railway line runs to the north of the site on a high embankment, with Lee Station located to the north-east.

Heritage/archaeology

- 6 The site is not located in a conservation area, nor is it directly adjoining one, however the Lee Manor Conservation Area is located close by, to the north of the railway line, and on the opposite side of Burnt Ash Hill.

Surrounding area

- 7 There is a local shopping parade on the opposite side of Burnt Ash Hill to the east of the site

Local environment

- 8 The adjacent railway embankment is a designated Green Corridor and Site of Importance for Nature Conservation.

Transport

- 9 The site has a PTAL rating of 3, based on a scale of 0-6b with 6b having the highest degree of accessibility to public transport.

- 10 Lee railway station is almost directly opposite the application site on Burnt Ash Hill.

2 RELEVANT PLANNING HISTORY

- 11 There is no relevant history

3 CURRENT PLANNING APPLICATION

3.1 THE PROPOSALS

- 12 Demolition of the existing builder's merchant on Holme Lacey Road, and car showroom buildings at 2 Burnt Ash Hill, and the construction of a new building for use as a builders merchants (sui generis) with service yard, car parking, landscaping and associated works.

- 13 The proposed builder's merchant would be retained and operated by the applicants, Travis Perkins.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

4 CONSULTATION

4.1 PRE-APPLICATION ENGAGEMENT

- 14 On Thursday 8th October 2020, leaflets were distributed by the applicant to local residents in the immediate local area of the Application Site. The area included Holme Lacey Road; Dallinger Road; and nearby residential and commercial premises on Burnt Ash Hill.
- 15 The leaflet provided initial information about the proposals and sought to address the key concerns that residents may have regarding the proposed development, primarily relating to noise, sustainability and hours of operation. The leaflet also included contact details of the Applicant should residents have further queries.
- 16 Two local residents contacted the Applicant, with questions relating to the specific uses proposed as part of the development; how site waste will be managed; when works are expected to begin on Site; and how the Healthy Neighbourhoods programme has been considered as part of the proposals.
- 17 The pre-application consultation is in line with the Lewisham SPD.

4.2 APPLICATION PUBLICITY

- 18 Site notices were displayed on 09 December 2020 and a press notice was published on 09 December 2020.
- 19 Letters were sent to residents and business in the surrounding area and the relevant ward Councillors on 03 December 2020.
- 20 6 responses received, comprising 4 objections from local residents, 0 support and 2 letters commenting on the proposal from local amenity groups.

4.2.1 Comments in objection

Comment	Para where addressed
Impact of large vehicles entering and exiting the site and safety concerns	108
Proposal will result in increased custom at an expanded site	47
Increased levels of traffic in local area	114
Noise impact concerns	146
HGV waiting / turning right onto residential streets surrounding site causes disturbance	132
Commercial premises of this scale inappropriate for residential area such as this.	150

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

Height of proposed building	76
The southern facade is positioned close to the boundary and the pedestrian footpath; it would be safer to be set further back from the pavement to improve visibility.	89

4.2.2 Local Amenity Group Comments

Comment	Para where addressed
<i>Lewisham Pedestrians:</i>	
Crossovers should reinforce pedestrian priority on footway	108
Changes to highway must take account of advice regarding 'shared space'.	132
<i>Lee Manor Society:</i>	
Site is adjacent to Lee Manor Conservation Area, though separated by the railway line and the parade of shops on Burnt Ash Hill	6
Building would have dominating presence	76
Needs to be sufficient, and well maintained landscaping	87
Safety of vehicle entrance on Burnt Ash Hill.	132

4.3 INTERNAL CONSULTATION

- 21 The following internal consultees were notified on 4 December 2021.
- 22 Highways: Requested further information. Once submitted no objections were raised subject to conditions and S278 works.
- 23 Urban Design: Commented on the proposed scheme, originally in objection but following receipt of further information the objection has been withdrawn.
- 24 SUDS officer: The suds officer raises no objections following receipt of further information, subject to a condition requiring compliance with the relevant targets.
- 25 Arboricultural officer: Raised several concerns relating to the proposed landscaping.
- 26 Ecology officer: requested further information that has been provided. No objections subject to conditions.
- 27 Environmental Health: Raised no objections, subject to compliance with several conditions.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

4.4 EXTERNAL CONSULTATION

28 The following External Consultees were notified on 4 December 2020:

29 Network Rail: Raised no objections, require applicant to ensure assets are protected.

30 TfL: Raised no objections.

31 Thames Water: Raised no objections, subject to several informative notes.

32 Met Police: Raised no objections, subject to a condition requiring the development to comply with SBD principles.

33 London Fire Brigade: raised no objection, however noted that an informative should states that LBF require access for fire appliances in accordance with Part B5 of Building Regulations Approved Document, and that adequate water for firefighting purposes would be provided.

5 POLICY CONTEXT

5.1 LEGISLATION

34 Planning applications are required to be determined in accordance with the statutory development plan unless material considerations indicate otherwise (S38(6) Planning and Compulsory Purchase Act 2004 and S70 Town & Country Planning Act 1990).

5.2 MATERIAL CONSIDERATIONS

35 A material consideration is anything that, if taken into account, creates the real possibility that a decision-maker would reach a different conclusion to that which they would reach if they did not take it into account.

36 Whether or not a consideration is a relevant material consideration is a question of law for the courts. Decision-makers are under a duty to have regard to all applicable policy as a material consideration.

37 The weight given to a relevant material consideration is a matter of planning judgement. Matters of planning judgement are within the exclusive province of the LPA. This report sets out the weight Officers have given relevant material considerations in making their recommendation to Members. Members, as the decision-makers, are free to use their planning judgement to attribute their own weight, subject to aforementioned directions and the test of reasonableness.

5.3 NATIONAL POLICY & GUIDANCE

- National Planning Policy Framework 2021 (NPPF)
- National Planning Policy Guidance 2014 onwards (NPPG)

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- National Design Guidance 2019 (NDG)

5.4 DEVELOPMENT PLAN

38 The Development Plan comprises:

- London Plan (March 2021) (LPP)
- Core Strategy (June 2011) (CSP)
- Development Management Local Plan (November 2014) (DMP)
- Site Allocations Local Plan (June 2013) (SALP)
- Lewisham Town Centre Local Plan (February 2014) (LTCP)

5.5 SUPPLEMENTARY PLANNING GUIDANCE

39 Lewisham SPG/SPD:

- Alterations and Extensions Supplementary Planning Document (April 2019)
- Planning Obligations Supplementary Planning Document (February 2015)
- Shopfront Design Guide Supplementary Planning Document (March 2006)

40 London Plan SPG/SPD:

- Planning for Equality and Diversity in London (October 2007)
- London's Foundations (2012)
- London View Management Framework (March 2012)
- All London Green Grid (March 2012)
- Character and Context (June 2014)
- The control of dust and emissions during construction and demolition (July 2014)
- Accessible London: Achieving an Inclusive Environment (October 2014)
- Energy Assessment Guidance (October 2018)

6 PLANNING CONSIDERATIONS

41 The main issues are:

- Principle of Development
- Employment
- Urban Design
- Impact on Adjoining Properties
- Transport
- Sustainable Development
- Natural Environment

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- Planning Obligations

6.1 PRINCIPLE OF DEVELOPMENT

General policy

42 The National Planning Policy Framework (NPPF) at paragraph 11, states that there is a presumption in favour of sustainable development and that proposals should be approved without delay so long as they accord with the development plan.

43 The London Plan (LP) sets out a sequential spatial approach to making the best use of land set out in LPP GG2 (Parts A to C) that should be followed.

Policy

44 Core Strategy Policies 3 and 5 outline that the Council will protect Local Employment Locations (LELs), and the scattering of employment locations throughout the borough outside of allocated or strategic sites.

45 DM 10 states the council will support uses within appropriate sui generis uses, within a Local Employment Location, subject to the use being appropriate in the location in relation to the surrounding built context, the intensity of the use and the new use meeting the aims in the Core Strategy Policy 3.

46 DM 11 states that the Council will seek to retain employment uses on sites and buildings in Town Centres, and Local Hubs where they are considered capable of continuing to contribute to and support clusters of business and retail uses, and where the use is compatible with the surrounding built context.

6.1.1 Principle of development conclusions

47 The applicant has stated that due to the age of the existing buildings on the Site, the constrained layout and increasing demand from the trade, the existing Travis Perkins branch cannot meet modern operational needs. In order to address this problem and so that the Lee branch can remain commercially viable, Travis Perkins (the applicant) acquired the adjoining car showroom site at 2 Burnt Ash Hill, in order that the existing branch be modernised and expanded across the two sites. It is stated in the submission that the intensity of usage of the site will not be expected to increase.

48 Both sites are proposed to be comprehensively re-developed to facilitate a new layout, introduce safer vehicle movements, construct a new, modern commercial unit that meet's current and future operational requirements and introduce noise mitigation measures along residential boundaries.

49 The existing builder's merchant is within the Manor Lane Local Employment Location, and the existing car showroom is an employment generating commercial use. Both are of Sui Generis use class.

50 There are no in-principle issues associated with the demolition of the existing buildings, nor with the construction of a new building and new site layout to be used as a builder's merchant (sui generis use class). The proposed builder's merchant use across the entire site is consistent with the aims of the above policies in protecting employment generating uses within and outside of LELs.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

51 Therefore the principle of development is supported, subject to the impact on the employment, the impact of the design of the building on the appearance of the surrounding area and neighbouring occupiers' amenity, as well as the impacts to the local transport network, and sustainability and environmental matters.

6.2 EMPLOYMENT

Policy

- 52 Para 81 of the NPPF states "Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development"
- 53 LPP E4 states a sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, making provision for a variety of operational requirements.
- 54 The retention, enhancement and provision of additional industrial capacity should be prioritised in locations that are accessible to the strategic road network and/or have potential for the transport of goods by rail, provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population, or support access to supply chains and local employment in industrial and related activities.
- 55 Core Strategy Policies 3 and 5 outline that the Council will protect Local Employment Locations (LELs), and the scattering of employment locations throughout the borough outside of allocated or strategic sites.
- 56 DM 11 states that the Council will seek to retain employment uses on sites and buildings in Town Centres, and Local Hubs where they are considered capable of continuing to contribute to and support clusters of business and retail uses, and where the use is compatible with the surrounding built context.

Discussion

- 57 The submitted planning statement states the new TP branch will retain the existing 12 Full Time Employees, and create additional jobs over the first 5 years of operation. The continued use of the western part of the site, which is within a designated LEL as a Travis Perkins Builders Merchant is therefore supported, as it would protect the LEL use of the site.
- 58 The car showroom, the eastern part of the site is currently vacant, but it is an employment generated use that is protected by Policy DM11. Officers have not been provided with previous employment numbers of the car showroom use when it was in operation, however it is considered the proposal will result in efficient use of the site which will see existing employment premises refurbished and brought back into beneficial economic use. Continued occupation of the Site by a larger and more modern TP branch will retain existing jobs and create additional jobs, whilst also supporting the local building supply chains, and continue to provide support for the local economy and industry in line with the above policies.
- 59 The proposed development will help to retain an existing local business to continue to operate from their existing site in a modern development to better suit their operational needs.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

6.2.1 Employment conclusion

60 The retention of the whole site as an employment location, facilitated through the construction of a new, fit for purpose building, and an amended site layout is a planning merit.

6.3 URBAN DESIGN

General Policy

61 The NPPF at para 126 states the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.

62 Policies D1 and D2 of the London Plan (2021), require development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings.

63 CSP 15 outlines how the Council will apply national and regional policy and guidance to ensure highest quality design and the protection or enhancement of the historic and natural environment, which is sustainable, accessible to all, optimises the potential of sites and is sensitive to the local context and responds to local character.

64 DMP 30 requires planning applications to demonstrate a site specific response which creates a positive relationship with the existing townscape whereby the height, scale and mass of the proposed development relates to the urban typology of the area.

6.3.1 Appearance and character

Policy

65 In terms of architectural style, the NPPF encourages development that is sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (para 130).

66 London Plan Policy D3 states that development should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness. Proposals should be high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well. Development should provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest

67 DM Policy 30 requires planning applications to demonstrate a site specific response which creates a positive relationship with the existing townscape whereby the height, scale and mass of the proposed development relates to the urban typology of the area.

Discussion

68 The proposed building would be located in a prominent location, at the junction of Burnt Ash Hill and Holme Lacey Road, and opposite the vehicular access to Lee Railway

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

station. The site is industrial and commercial in character, and the existing buildings reflect this and are not considered to contribute positively to the character of the area.

- 69 The proposed building is a single storey warehouse style building with a dual pitched roof and it is of a similar scale to the existing car showroom building on the site that is to be demolished.
- 70 The council's urban design officer initially raised concern regarding the impact of the building to the character of the surrounding area, and requested further information from the applicant, as well as suggesting several amendments.
- 71 The applicant responded by sending 3D visualisations of the proposal, as well as a statement which justified why the suggested amendments were not possible for practical and functional reasons, as well as highlighting several aspects of the design rationale for the proposed development.
- 72 The council's urban design officer reviewed the additional information that had been submitted, and has stated they consider the design to be acceptable, and accepted the applicant's justification of why the suggested amendments could not be made, for technical and functional reasons.
- 73 Officers therefore consider that the proposed building would be of an acceptably high quality, modern and functional commercial building, which would have an acceptable impact on the character of the area.
- 74 The proposed materials of brick, timber and cladding systems reflect that of a modern commercial building. Three large windows have been included along the Holme Lacey Road elevation to provide active views into the warehouse space, a large street level glazed entrance screen and doors into the trade counter area have also been included to provide a further active frontage. This elevation is also stepped along its entire length to provide an articulated façade with differing materials to create interest.
- 75 Planting zones would be included around its edges, which would be extended along the entire length of the building and continue to extend across the frontage of the open yard, several trees are proposed.
- 76 The proposed building is considered to have an acceptable appearance, and would not result in harm to the character of the surrounding area, in line with the above policies.

Layout

Policy

- 77 LPP D3 requires proposals to be street-based with clearly defined public and private environments, and to facilitate efficient servicing, as well as deliveries that minimise negative impacts on the environment, public realm and vulnerable road users. It also states they should provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.
- 78 LPP G5 Urban Greening states major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

79 DMP 25 requires the submission of a landscape scheme, including 5 years of management and maintenance of high quality hard and soft landscapes and trees.

Discussion

80 The existing site consists of 2 buildings in separate uses, the existing Travis Perkins to the west, and the former car showroom to the east. The remainder of the site comprises hard landscaping.

81 The proposed site has been designed to allow the site to function according to the requirements of the applicant. The submitted Design and Access Statement states the yard areas and parking have been carefully considered for ease of operations, safe use, and have been tried and tested on other Travis Perkins branches of this type and that the layout of the site has been designed to minimise any potential conflicts between vehicles and pedestrians. The layout also maximises the space available for external storage and for customer loading.

82 The proposed building would be located in the south-eastern corner of the site, so that it fronts Burnt Ash Hill and Holme Lacey Road. It would be set back from Burnt Ash Hill by approximately 3.5m, and back from Holme Lacey Road by approximately 1.5m.

83 Although the building would be closer to the Holme Lacey Road frontage than the existing which will give the building more prominence, the inclusion of windows and planting along this elevation, as well as the high quality materials, mean this would not result in a harmful impact.

84 The vehicular access would be from an existing access on Burnt Ash Hill, to the north of the building, and a one way system would be created through the site. The vehicular exit would be to Holme Lacey Road, from an existing access, to the west of the building. The loading bay would be located adjacent to the vehicular exit, in the location of the existing loading bay for Travis Perkins. The north-western portion of the site, in the location of the existing Travis Perkins building would be used as an external stock storage area with HGV access around.

85 The western part of the site is proposed as a stock storage area, with a mixture of stock stored on the ground, up to heights of 4m. Along the northern boundary, and towards the centre of the western 'leg' of the site racking for stock storage up to 5m would be installed. Officers are satisfied the proposed racking would have an acceptable appearance on the surrounding area, due to its siting relatively far back into the site and away from the street.

86 To ensure the storage of stock and racking within the site does not harm the visual amenities of the residential properties at 2-10 Holme Lacey Road, a condition restricting the height of stock storage adjoining these rear boundaries to no more than 3m is recommended. Details of boundary treatment are also recommended to be secured by condition.

87 Soft landscaping is proposed adjacent to the street facing elevations, including two trees to the Burnt Ash Hill frontage, and two along and planting areas within the recessed elements of the southern elevation. Considering the commercial nature of the site, and that there is no existing soft landscaping on the site, the proposed quantum of soft landscaping is considered to be acceptable, as it would be an improvement on the existing situation. The final scheme of soft landscaping including maintenance is recommended to be secured by condition.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 88 It is noted the council's arboricultural officer has raised several concerns, including the quantum of soft landscaping proposed. They have requested the urban greening score for the site. However, as an industrial site, there is no policy requirement for the site to achieve a certain urban greening score. It is also noted that the existing site is industrial in nature, and is covered fully by hard landscaping, so the proposed scheme of soft landscaping would be an overall improvement to the site. The final details of the soft landscaping scheme, including maintenance is recommended to be secured by condition.
- 89 On balance officers consider the layout of the site to be acceptable, in line with the development plan.

Detailing and Materials

Policy

- 90 Policy D3 of the London Plan requires development proposals to be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.

Discussion

- 91 The building façades will have a low level Red stock clay brick plinth wall of varying heights from 450mm to 2475mm, above this will be Hollybush Green micro rib cladding panels laid horizontal up to 5475mm and above this to underside of eaves will be Merlin Grey half round cladding also laid horizontal. The full height timber clad feature panels will have tongue & groove Siberian Larch laid horizontal with brown stained finish. The low pitch roof will have Merlin Grey trapezoidal cladding panels with flush translucent GRP rooflights. The roof will be finished with matching ridge and verge flashings. The eaves will have Merlin Grey powder coated fascia with low rise sinuzoidal soffit lining. The rainwater pipes will be in black upvc.
- 92 Officers consider the proposed quality of detailing and materials to be high, and appropriate for a functional commercial building, in a prominent location such as this.

6.3.2 Urban design conclusion

- 93 The proposed building is of an appropriate scale, and the layout of the site has been designed for functionality and safety of the proposed use. Officers originally raised some concerns with regard to the design of the building, however following the receipt of further information, including 3D visuals, the buildings appearance is considered to be acceptable.
- 94 The elevational treatments are considered to be good quality, and the proposed soft landscaping adjacent to the public realm would soften the impacts. Overall the proposal would have an acceptable impact on the appearance of the surrounding area, in line with above mentioned policies.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

6.4 TRANSPORT IMPACT

General policy

- 95 NPPF Paragraph 110 states that planning decisions should ensure safe and suitable access to the site for all users, and that any significant impacts from the development on the transport network, or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 96 Para 111 of the NPPF states 'Development should only be prevented or refused on transport grounds if there would be an unacceptable impact on highway safety, or on the residual cumulative impacts on the road network would be severe'.
- 97 CSP 14 'Sustainable movement and transport' promotes more sustainable transport choices through walking, cycling and public transport. It adopts a restricted approach on parking to aid the promotion of sustainable transport and ensuring all new and existing developments of a certain size have travel plans.

6.4.1 Access

Policy

- 98 The NPPF requires safe and suitable access for all users. Paragraph 110 states that in assessing application for development it should be ensured that appropriate opportunities to promote suitable transport modes can – or have been taken up and that amongst other things safe and suitable access to the site can be achieved for all users. Paragraph 111 states development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

Discussion

- 99 The site is to be accessed by vehicles from Burnt Ash Hill from the existing vehicle access point, and a one way system within the site would be created, with the exit on Holme Lacey Road. The pedestrian access would be from Burnt Ash Hill.
- 100 The Council's highway officer has recommended that improvement works are required to the proposed vehicular access and exit points. These works should include the construction of bellmouth accesses with associated dropped kerbs, tactile paving and double yellow lines around the access points. These works are proposed to be secured through a S278 Agreement.
- 101 The proposed access point were subject to a visibility assessment to determine the suitability of the proposed access / egress system. Visibility splays of 2.4m x 43m are provided at the egress onto Holme Lacey Road, and 45m forward visibility at the access point on Burnt Ash Hill which is acceptable and complies with design standards.
- 102 However, it is noted that footway parking adjacent to the Holme Lacey Road exit could impact on intervisibility between exiting vehicles and road users on Holme Lacey Road. The highway officer has recommended waiting restrictions should be applied on Holme Lacey Road, where there is existing on-street parking close to the proposed site exit, to ensure parked vehicles would not impact on intervisibility. This would result in a loss of on-street parking. The applicant has submitted the results of a parking survey, which

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

demonstrate surrounding streets could absorb the impact of this loss of parking. This is recommended to be included in the S278 agreement.

- 103 Analysis of collision data adjacent to the site identified that nine collisions had occurred within the vicinity of the Holme Lacey Road / Burnt Ash Hill junction during the assessment period (since 2016), all of which were recorded as 'slight' in severity, and four of these involved a cyclist and a vehicle.
- 104 Swept path analysis has been submitted to demonstrate an articulated lorry, a 10m rigid truck, and a customer van can access and egress the site in forward gear. Section 4.14 of the Transport Statement confirms that *"HGV's are required to overrun the Holme Lacey Road centreline whilst egressing the site"*.
- 105 Whilst it is accepted that this is an existing arrangement, the proposal could result in an increase in the number of HGV vehicles undertaking this manoeuvre, which could increase the potential for conflict, particularly as Holme Lacey Road is a designated cycle route. Given the potential increase in the number of HGVs overrunning the Holme Lacey Road centreline whilst egressing the site, works are required to reduce vehicle speeds in this location. The highway officer has requested the following works be secured through a Section 278 Agreement:
- Improvement works are required to the Burnt Ash Hill / Holme Lacey road junction, including a raised table crossing, to slow speeds when vehicles are manoeuvring through the junction, and reduce conflict with cyclists. These works will also improve the pedestrian crossing facilities in this location.
 - Traffic calming measures are also required at the Holme Lacey road / Dallinger road junction to reduce vehicle speed in the vicinity of the vehicle exit point on Holme Lacey road.
 - Additional cycle route signing / marking should be provided on Holme Lacey road to reinforce the presence of cyclists in the vicinity of the application site.
 - An independent Road Safety Audit should be produced in association with the works.
- 106 The development would result in the expansion of the existing Travis Perkins use that currently occupies part of the site and this may result in an increase in the number of vehicle trips to the site. Furthermore, the consolidation of entrances onto Burnt Ash Hill would result in an increase in the number of HGV turning manoeuvres in the vicinity of the Holme Lacey Road / Burnt Ash Hill junction. Therefore the above recommended works are considered necessary to mitigate the impact of the proposal.
- 107 Furthermore, to ensure the one way system is adhered to, details of signing to direct traffic to the proposed site access point on Burnt Ash Hill, And a 'no entry' sign on the Holme Lacey Road exit are recommended to be secured by condition.
- 108 Subject to completion of the works recommended to be secured through a Section 278 Agreement above, the proposed access is considered acceptable, and would not have a harmful impact on highway safety. The S278 works will be secured through a Section 106 Agreement.

6.4.2 Local Transport Network

Policy

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

109 CSP 14 states the Council will work with Transport for London, Network Rail and other partners to ensure the delivery of necessary transport infrastructure, as well as working with adjoining boroughs to address the cumulative impact of development by enabling more effective management of traffic and improving the environment for all users, including pedestrians, cyclists and public transport users.

Discussion

110 Due to the nature of the use it is expected most customer trips would be made by private vehicles. Furthermore, the majority of deliveries made to, and from the site are using HGVs.

111 Using TRICS data, the applicant has calculated the number of vehicle trips that would be generated by the existing uses of the site, including the car showroom, and the forecast number of trips for the proposed development. The results indicated that the proposal could be expected to attract an additional four vehicle trips in the AM peak period, with a reduction of six vehicle trip in the PM peak. This is consistent with on-site observations at Travis Perkins branches across the country, in which the peak operating hour for the builders' merchants was generally found to be 08:00 – 09:00.

112 TfL have requested that that if permission is granted it is ensured that safe, efficient and convenient bus operations on Burnt Ash Hill including the bus stop opposite the site are maintained during the site clearance and construction works and subsequently when in operation as a builders merchants on the consolidated site. A construction management plan would be required as a condition of development, and TfL would be consulted on this document.

113 They have also requested that arrangements are put in place so as to minimise peak time vehicle movements as well as generally encouraging sustainable and active travel by staff and customers. A Travel Plan has been submitted, which sets out measures to encourage colleagues and customers to travel to the site by alternative means of transport to single occupancy vehicle trips. It will be a condition of development that the measures set out in the plan be followed once the site is operational.

114 Officers consider, subject to the recommended conditions, the proposal would have an acceptable impact on the local highway network.

6.4.3 Servicing and refuse

Policy

115 Policy T7 of the London Plan requires development plans and development proposals to facilitate sustainable freight movement by rail, waterways and road.

116 Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

Discussion

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 117 The site would be accessed by all vehicles, including delivery vehicles from Burnt Ash Hill, and there would be a one way system through the site, with the exit onto Holme Lacey Road. The loading bay would be located close to the vehicle exit point.
- 118 Details of the proposed Delivery and Servicing 'Management Plan' is included within Appendix G of the Transport Statement. It states the following traffic management procedures and controls will be in place to ensure segregation of people and vehicles and to minimise vehicles collision, property and product damage, and limit the number of HGVs waiting outside of the branch on the public highway;
- Lighting
 - Clearly marked pedestrian walkways
 - Defined traffic flow and routes throughout the site
 - Line marking and directional signage for vehicles
 - Signage to alert drivers of established speed limit & speed limit markings on the yard floor.
 - Speed humps used for traffic calming purposes
 - Signage to communicate site delivery rules
 - Designated parking spaces and pedestrian routes and crossing point.
 - Designated and controlled HGV bay and specific control for loading/unloading.
- 119 It also includes general principles for management of pedestrians and vehicles within the site, as well as supervision and monitoring.
- 120 The highway officer notes that these details aren't in accordance with TfL's Delivery and Servicing Plan Guidance. To ensure the management of deliveries on site in future acceptable, and in accordance with TfLs requirements, a delivery and servicing plan is recommended to be secured by condition. This will also include details of the waste management plan.

6.4.4 Transport modes

Walking and cycling and public transport

Policy

- 121 Paragraph 112 of the NPPF states that development should give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring area. Development should create places that are safe, secure and attractive, minimising the scope for conflicts between pedestrians, cyclists and vehicles.

Discussion

- 122 A total of ten cycle parking spaces (5 Sheffield type stands) are proposed for the development. Full details of the proposed cycle parking are recommended to be secured by condition and will need to be in accordance with London Cycle Design Standards.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 123 To ensure the footway is safe and suitable following construction works, the footway will need to be reinstated in places, and improved in others. These works will be secured through the recommended Section 278 Agreement.
- 124 There is a train station and bus stops close to the site, which can facilitate trips by public transport to the site.
- 125 A Travel Plan has been submitted, and the provisions are recommended to be secured by condition to ensure staff are encourage to travel to the site sustainably.

Private cars (include disabled and electric charging points)

Policy

- 126 Policy T6 of the London Plan states Car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. The maximum car parking standards set out in Policy T6 .5 Non-residential parking should be applied to development proposals.
- 127 Where car parking is provided in new developments, provision should be made for infrastructure for electric or other Ultra-Low Emission vehicles.
- 128 A Parking Design and Management Plan should be submitted alongside all applications which include car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design.

Discussion

- 129 The existing Travis Perkins site currently accommodates eight car parking spaces, including one disabled bay. The proposed development will provide a total of 15 parking spaces, including one disabled bay. The provision of additional parking at the development is to accommodate existing demand. The existing quantum of parking spaces does not provide sufficient space for existing uses. Travis Perkins have assessed the daily requirement observed and determined that 15 car parking spaces are suitable for efficient site operation.
- 130 The highway officer has confirmed that the increase in operational parking is acceptable, but the following details are required:
- Details of the Parking management strategy within the site. These details are required to ensure informal loading or parking within the proposed access / egress route doesn't result in vehicles queuing back onto Burnt Ash Hill which would impact on traffic flow. This will be secured by condition.
 - Details of rapid electric vehicle charging points in the proposed loading and operational parking areas within the site, are also to be secured by condition.
 - A staff Travel Plan is also to be secured by condition, it should include measures to encourage staff to travel to the site by sustainable modes, including provision of showering and changing facilities.
- 131 The details noted above will be secured by conditions, set out at the bottom of this report.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

6.4.5 Transport impact conclusion

- 132 Improvement works and traffic calming measures, as well as signage and road markings are required on the surrounding highway, given the potential increase in HGV movements, and these are recommended to be secured through a S278 agreement.
- 133 Further details are also recommended to be secured by condition with regard to delivery and servicing and parking management and cycle parking, as well as a staff Travel Plan.
- 134 Subject to a S278 agreement and satisfactory details being submitted in respect of these matters, the impact to the local highway network is considered to be acceptable, and in line with the Development Plan as a whole.

6.5 LIVING CONDITIONS OF NEIGHBOURS

General Policy

- 135 The NPPF at para 130 sets an expectation that new development will be designed to create places that amongst other things have a 'high standard' of amenity for existing and future users.
- 136 Paragraph 185 of the NPPF states that planning decisions should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life

6.5.1 Enclosure and Outlook, Daylight and Sunlight

Policy

- 137 Overbearing impact arising from the scale and position of blocks is subject to local context. Outlook is quoted as a distance between habitable rooms and boundaries.

Discussion

- 138 The scale and siting of the proposed building away from adjoining properties means there would be no impact on neighbouring amenity with regards to enclosure, outlook, daylight or sunlight. The closest residential property to the proposed building is on the opposite side of Holme Lacey Road, 17m away. The outlook from these would not be significantly harmed as a result of the proposal, nor would it cause a harmful increase in enclosure. These windows are north facing, and the proposed building would be to the north, so there would not be a harmful impact on daylight and sunlight.
- 139 A condition restricting the height of stock storage adjacent to residential boundaries to a maximum height of 4m is recommended to ensure this does not have a harmful impact on neighbouring visual amenity.

6.5.2 Privacy

Policy

- 140 Privacy standards are distances between directly facing existing and new habitable windows and from shared boundaries where overlooking of amenity space might arise.

Discussion

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 141 4 upper floor windows are proposed on the west side of the building at mezzanine floor level, a minimum distance of 33m to the nearest residential garden. At this distance the proposal would not result in a harmful loss of privacy to neighbours.
- 142 Due to the location of proposed ground floor windows in relation to the closest residential properties, at least 17m across Holme Lacey Road there would not be a loss of privacy to neighbours.

6.5.3 Noise and disturbance

Policy

- 143 The National Planning Policy Guidance for Noise (July 2019) advises on how planning can manage potential noise impacts in new development. It states that local planning authorities' plan-making and decision taking should take account of the acoustic environment and in doing so consider whether or not:
- a significant adverse effect is occurring or likely to occur;
 - an adverse effect is occurring or likely to occur; and
 - a good standard of amenity can be achieved.
- 144 The NPPG establishes a noise exposure hierarchy with three levels:
- No observed effect level: this is the level of noise exposure below which no effect at all on health or quality of life can be detected.
 - Lowest observed adverse effect level (LOAEL): this is the level of noise exposure above which adverse effects on health and quality of life can be detected.
 - Significant observed adverse effect level (SOAEL): This is the level of noise exposure above which significant adverse effects on health and quality of life occur.
- 145 The guidance does not provide values for the LOAEL or SOAEL. The Explanatory Note to the Noise Policy Statement for England (NPSE) states that "it is not possible to have a single objective noise-based measure that defines SOAEL that is applicable to all sources of noise in all situations. Consequently, the SOAEL is likely to be different for different noise sources, for different receptors and at different times."

Discussion

- 146 A noise impact assessment has been submitted and this concludes that noise intrusion assessments of external noise levels from goods deliveries, LGV loading activities, BSP, car parking and forklift movements, have shown that noise levels from the proposed extension are predicted to be below the LOAEL criteria at all sensitive receptor locations on the basis of worst-case assumptions.
- 147 Accordingly, the proposed operations are not expected to have a significant 'adverse impact' on health or quality of life at nearby dwellings and satisfies the relevant policy considerations set out in the Development Plan.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

148 Furthermore, the proposed use of the site is commensurate with the existing use, both being a Sui Generis builders' merchant. Officers therefore do not expect the proposed use would have a significant impact on the amenity of neighbours with regards to noise and disturbance.

149 Notwithstanding, the proposal includes the addition of acoustic fencing between the site, and the neighbouring gardens of properties which front Holme Lacey Road, which is not currently present. Subject to details, this would reduce the noise impact of the proposed development.

6.5.4 Impact on neighbours conclusion

150 Officers have assessed the impact on neighbouring amenity against the relevant policies, and consider these to be acceptable, and in line with the Development Plan.

6.6 SUSTAINABLE DEVELOPMENT

General Policy

151 NPPF Paragraph 152 sets an expectation that planning will support transition to a low carbon future. This is reflected in relevant policies of the London Plan and the Local Plan.

6.6.1 Energy and carbon emissions reduction

Policy

152 CSP8 seeks to minimise the carbon dioxide (CO₂) emissions of all new development and encourages sustainable design and construction to meet the highest feasible environmental standards.

153 DMP22 require all developments to maximise the incorporation of design measures to maximise energy efficiency, manage heat gain and deliver cooling using the published hierarchy.

154 LPPSI 2 requires new development to be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

1) be lean: use less energy and manage demand during operation

2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly

3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site

4) be seen: monitor, verify and report on energy performance.

Discussion

155 A sustainability and energy report has been submitted in support of the proposal. It sets out measures to reduce emissions, in line with Part L Building Regulations targets.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

Through the use of its passive design, heat pumps and PV (Solar) Panels a 42% improvement over the minimum requirements is proposed to be achieved.

Be Lean

- 156 Passive measures include air tight insulation of the proposed building, a daylighting strategy and ventilation strategy.

Be Clean

- 157 A low carbon air source heat pump, and electric heating to be used in heated areas. Main warehouse areas would not be heated.

Be Green

- 158 PV panels are proposed to be mounted to the roof of the building. 30m² of a 130W/m² rated panel is required. This generates 3.9kW of electricity at its peak which is under the base electrical demand for the building.

Carbon Offset

- 159 The proposed energy usage and emissions reductions set out in the energy statement are considered to be acceptable and the measures to achieve this, set out in the energy strategy are recommended to be secured by condition.
- 160 A carbon offset contribution of £23,400 would be payable. £104 x 30 years = £1,800 Per Tonne. The proposal would expect to generate 13 tonnes of CO₂ per year. 1800 x 13 = £23,400.

6.6.2 Flood Risk

Policy

- 161 LPP SI 12 requires development proposals to ensure that flood risk is minimised and mitigated.
- 162 The proposal has been submitted with a Flood Risk Assessment and Drainage Strategy, prepared by Fairhust.

Discussion

River flood risk

- 163 The site is located in Flood Risk Zone 1, and is therefore at low risk of flooding.

Surface water flooding

- 164 The risk of surface water flooding is noted in the submission as very low to medium. Surface water run-off from the site is proposed to be attenuated on site and discharged at 2.5l/s to mitigate against surface water flooding.

Groundwater flooding

- 165 The submission notes that the risk of flooding from groundwater is possible when groundwater levels are high.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

6.6.3 Sustainable Urban Drainage

Policy

- 166 LPP SI 13 requires the mitigation of flooding, or in the case of managed flooding, the stability of buildings, the protection of essential utilities and the quick recovery from flooding. The LP expects development to contribute to safety, security and resilience to emergency, including flooding.
- 167 CSP 10 requires developments to result in a positive reduction in flooding to the Borough.
- 168 Further guidance is given in the London Plan's Sustainable Design and Construction Supplementary Planning Guidance.
- 169 Policy G4 requires SUDS unless there are practical reasons for not doing so. In addition, development should aim to achieve greenfield run-off rates and ensure surface water is managed in accordance with the policy's drainage hierarchy. The supporting text to the policy recognises the contribution 'green' roofs can make to SUDS. The hierarchy within the policy establishes that development proposals should include 'green' roofs and that Boroughs may wish to develop their own green roof policies. To this end, CSP 7 specifies a preference for Living Roofs (which includes bio-diverse roofs) which in effect, comprise deeper substrates and a more diverse range of planting than plug-planted sedum roofs, providing greater opportunity for bio-diversity.
- 170 Further guidance is given in the London Plan's Sustainable Design and Construction Supplementary Planning Guidance and the Non-Statutory Technical Standards for Sustainable Drainage Systems.

Discussion

- 171 The submission includes a drainage Strategy using piped networks and various attenuation tanks to convey, attenuate and treat flows prior to discharge into the surface water sewer. The Drainage Strategy follows the SuDS principles to provide amenity, quality and water treatment within the design.
- 172 In response to comments received from the Council's flood risk manager, further information was submitted. The flood risk manager has reviewed the revised documents, and has confirmed that the revised SUDS strategy is acceptable, subject to compliance with the drainage plan. This is recommended to be secured as a condition of development.

6.6.4 Sustainable Infrastructure conclusion

- 173 Subject to compliance with the recommended conditions, the proposed measures to reduce carbon, and mitigate against flooding are considered to be acceptable, in line with the Development Plan.

6.7 NATURAL ENVIRONMENT

General Policy

- 174 Contributing to conserving and enhancing the natural environment and reducing pollution is a core principle for planning.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 175 The NPPF and NPPG promote the conservation and enhancement of the natural environment (chapter 15) and set out several principles to support those objectives.
- 176 The NPPF at para 185 states decisions should ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the sensitivity of the site or wider area to impacts that could arise from the development.
- 177 LPP G1 sets out the Mayor of London's vision for Green Infrastructure as a multifunctional network that brings a wide range of benefits including among other things biodiversity, adapting to climate change, water management and individual and community health and well-being.

6.7.1 Ecology and biodiversity

Policy

- 178 Section 40 of the Natural Environment and Rural Communities Act 2006 places a duty on all public authorities in England and Wales to have regard to the purpose of conserving biodiversity.
- 179 The NPPF at para 174 states decisions should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. At para 180, it sets out principles which LPAs should apply when determining applications in respect of biodiversity.
- 180 LPP G5 seeks wherever possible to ensure that development makes a positive contribution to the protection, enhancement, creation and management of biodiversity.

Discussion

- 181 There are no statutory designations of nature conservation value within or immediately adjacent to the site. The closest such site is Burnt Ash Pond LNR and SBI2 which is located approximately 1km to the southeast. Oxleas Woodland SSSI, LNR and SMI is also located approximately 3.6km to the northeast of the site. Due to the distance, the proposal would not impact on these designated sites.
- 182 The application site was subject to an extended Phase 1 habitat survey in August 2020. A desk-based study was also undertaken, and the results submitted in an Ecological Assessment document.
- 183 No evidence of roosting bats has been found on the site, nor of any other protected species, however the adjacent boundary vegetation to the north offers opportunities for bat foraging and commuting. The Council's Ecology officer requested further details on the lighting strategy, to ensure this would not result in harm to bats foraging on the adjacent site. The lighting strategy that has been submitted in response is considered to be acceptable, and this will be secured by condition.
- 184 The Ecological report concludes, that subject to recommended mitigation and enhancement measures, the proposal would accord with planning policy.
- 185 The council's ecology officer has confirmed they have no objections to the proposal, and the impact to ecology would be acceptable, subject to the following conditions:

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- Prior to demolition a qualified ecologist to survey the buildings for roosting bats, nesting birds and similarly, before vegetation clearance in bird nesting season
- Bird/bat boxes are installed as per EclA recommendations (7.15, 7.19)
- Native, wildlife friendly planting as per EclA recommendations (7.15, 7.19)
- Standard engineering practice in respect of pollution control and dust should be implemented during the construction phase to avoid potential adverse effects upon Hither Green Station SBI2. With these safeguards in place it is considered unlikely that the redevelopment proposals will have any significant adverse effect upon the designation

6.7.2 Green spaces and trees

Policy

- 186 S.197 of the Town and Country Planning Act gives LPAs specific duties in respect of trees.
- 187 LPP G7 protects trees of value and replacements. New development should include additional trees wherever appropriate, particularly large-canopied species.
- 188 Paragraph 174 of the NPPF (2021) requires that decisions should contribute to and enhance the natural and local environment. DM Policy 25 seeks to ensure that applicants consider landscaping and trees as an integral part of the application and development process.

Discussion

- 189 Of the 16 individual trees and 2 groups identified in the submitted arboriculture report, 1 tree requires removal to facilitate the works. The arboricultural report also makes recommendations to safeguard the remaining trees surrounding the application site which are to be retained and protected from any damage due to demolition and construction work including construction of new surfacing, and root protection details.
- 190 Two new trees are proposed adjacent to the Burnt Ash Hill frontage, and four adjacent to Holme Lacey Road.
- 191 The council's arboricultural officer does not dispute the findings of the arboricultural report, nor raise objections to the proposed loss of a tree. However they have raised concern that there is insufficient landscaping proposed around the building. It is noted that landscaping is proposed to the southern and eastern boundaries of the proposed building, which is a clear improvement on the existing situation. Details of landscaping are recommended to be secured by condition.
- 192 The council's ecology officer recommended a green roof, however, the applicant confirmed this would not be structurally viable on the proposed building.
- 193 The site is in existing industrial use, and consists of majority hardstanding the proposed scheme of landscaping would be an improvement upon this. The final scheme of soft landscaping and planting, including a scheme of maintenance are recommended to be

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

secured by condition. On balance therefore, officers consider the impact to green spaces and trees to be acceptable.

- 194 A condition requiring the offsite trees to be protected during works as recommended by the arboricultural report, and to not be removed without the consent of the council is recommended to ensure this.

6.7.3 Ground pollution

Policy

- 195 DMLP 28 aims to ensure that any land known or suspected of being contaminated or where a sensitive use is proposed, is dealt with before the development commences.

Discussion

- 196 The application has been submitted with a ground investigations report, and remediation strategy prepared by Soiltechnics. This sets out a number of verification requirements, that are recommended to be submitted in a verification report. The verification report will need to include the following details:

- Waste transfer notes confirming the removal of underground tanks and any grossly contaminated soils.
- Photographs confirming the removal of the tanks and any contaminated soils.
- Statement from competent person confirming that all grossly impacted soils from around the tanks removed.
- Statement from contractor confirming that no grossly contaminated water was observed OR details of contaminated water removed from site, including waste transfer notes.
- Confirmation of the specification of vapour membrane installed and certificate of installation.
- Statement from contractor confirming that no unexpected contamination was encountered OR details of unexpected contamination and additional remedial measures.

- 197 The Council's Environmental Health team have been consulted. They stated that generally the findings of the reports are acceptable, however several limitations have been identified: The main workshop area, the location of the two electric stations to the north and south (with possible PCBs), the soils underneath the tank accessories and underneath the existing buildings were not investigated. The exact locations of the tanks below ground level should be investigated should be provided. The following also need to be provided: a Petroleum search and provision of fate of the underground tanks and Health and safety risk assessment, Detailed UXO Risk Assessment Report, An asbestos survey.

- 198 Environmental health have recommended a condition requiring the details of a further investigations report and remediation strategy to be submitted and approved in writing by the LPA prior to commencement of works. A condition requiring submission and approval of these documents is therefore recommended.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

6.7.4 Air pollution

Policy

- 199 The NPPF at para 174 states decisions should among other things prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution. Development should, wherever possible, help to improve local environmental conditions such as air quality.
- 200 CS Policies 7 and 9 and DM Policy 23 provide the local plan policy basis for assessing development proposals.
- 201 The site is located in the London Borough of Lewisham (LBL) Air Quality Management Area (AQMA) which consists of four large AQMAs and a series of ribbon roads, declared in July 2011. The site is currently occupied by commercial. The proposals is for the demolition of the existing buildings and construction of new builders merchant.
- 202 An Air Quality Assessment (AQA) has been submitted in support of the application. The AQA included an assessment of potential air quality impacts arising from the construction and operation of the proposed development.

Discussion

- 203 The council's environmental protection manager has been consulted on the submitted AQA, and made the following comments: *The findings of the modelling using ADMS (Atmospheric Dispersion Modelling System) are generally considered to be acceptable. However, air quality neutral assessment has not been considered or discussed in the assessment and the reason for exclusion not provided.*
- 204 *Consideration should also be given to the potential cumulative impacts on air quality which may arise during the construction or operational phases as a result of emissions arising from other developments (if any) within a 100m radius of the development. Only zero-emission developments are unlikely to have any impact on local or global air quality and therefore mitigation should always be a consideration for all developments. All standard mitigation measures should be approved by the local authority.*
- 205 *A Dust Management plan is also required for the development. All the measures recommended for medium risk sites contained in Appendix 7 of the Mayors SPG should be incorporated into an updated plan. The plan should pay particular attention to measures to prevent deposition of mud on the highway; dust mitigation and suppression measures to control the spread of dust from demolition, disposal and construction, and measures to minimise the impact of construction activities.*
- 206 They have recommended an updated air quality assessment, and air quality neutral assessment, and a dust management plan be secured by condition. Subject to these, the proposed impacts are considered to be acceptable.

6.7.5 Natural Environment conclusion

- 207 Subject to the recommended conditions, officers consider the impacts to the natural environment to be acceptable, in line with the Development Plan.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

6.8 PUBLIC HEALTH, WELL-BEING AND SAFETY

General Policy

- 208 The NPPF and NPPG promote healthy communities. Decisions should take into account and support the health and well-being of all sections of the community. The NPPG recognises the built and natural environments are major determinants of health and wellbeing. Further links to planning and health are found throughout the whole of the NPPF. Key areas include the core planning principles (para 15) and the policies on transport (chapter 9), high quality homes (chapter 5), good design (chapter 12), climate change (chapter 14) and the natural environment (chapter 15).
- 209 The NPPG sets out a range of issues that could in respect of health and healthcare infrastructure, include how development proposals can support strong, vibrant and healthy communities. Development, where appropriate, should encourage active healthy lifestyles that are made easy through the pattern of development, good urban design, good access to local services and facilities; green open space and safe places for active play and food growing, and is accessible by walking and cycling and public transport. The creation of healthy living environments for people of all ages can support social interaction.
- 210 Para 127 Good design create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Discussion

- 211 The Metropolitan Police have been consulted on the proposal, and have stated the site layout appears well thought out, with good sight lines, the use of security fencing is welcomed, and will have a security guard when the premises are closed. However, they have stated that there is no mention of the security rating of proposed fencing and doors, and therefore request a condition requiring further information regarding Secured by Design features to be submitted to the Council.

6.8.1 Public Health, well-being and safety conclusion

- 212 Subject to the submission of details relating to secured by design measures, the proposed development would be acceptable with regards to public health and safety.

7 LOCAL FINANCE CONSIDERATIONS

- 213 Under Section 70(2) of the Town and Country Planning Act 1990 (as amended), a local finance consideration means:
- a grant or other financial assistance that has been, or will or could be, provided to a relevant authority by a Minister of the Crown; or
 - sums that a relevant authority has received, or will or could receive, in payment of Community Infrastructure Levy (CIL).

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 214 The weight to be attached to a local finance consideration remains a matter for the decision maker.
- 215 The CIL is therefore a material consideration. As the floorspace of the proposed building is less than the combined floorspace of the existing buildings, 0 CIL would be payable.
- 216 0 Lewisham CIL and 0 MCIL is estimated to be payable on this application, subject to any valid applications for relief or exemption, and the applicant has completed the relevant form. This would be confirmed at a later date in a Liability Notice.

8 EQUALITIES CONSIDERATIONS

- 217 The Equality Act 2010 (the Act) introduced a new public sector equality duty (the equality duty or the duty). It covers the following nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 218 In summary, the Council must, in the exercise of its function, have due regard to the need to:
- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - advance equality of opportunity between people who share a protected characteristic and those who do not;
 - foster good relations between people who share a protected characteristic and persons who do not share it.
- 219 The duty continues to be a “have regard duty”, and the weight to be attached to it is a matter for the decision maker, bearing in mind the issues of relevance and proportionality. It is not an absolute requirement to eliminate unlawful discrimination, advance equality of opportunity or foster good relations.
- 220 The Equality and Human Rights Commission has recently issued Technical Guidance on the Public Sector Equality Duty and statutory guidance entitled “Equality Act 2010 Services, Public Functions & Associations Statutory Code of Practice”. The Council must have regard to the statutory code in so far as it relates to the duty and attention is drawn to Chapter 11 which deals particularly with the equality duty. The Technical Guidance also covers what public authorities should do to meet the duty. This includes steps that are legally required, as well as recommended actions. The guidance does not have statutory force but nonetheless regard should be had to it, as failure to do so without compelling reason would be of evidential value. The statutory code and the technical guidance can be found at: <https://www.equalityhumanrights.com/en/publication-download/technical-guidance-public-sector-equality-duty-england>
- 221 The Equality and Human Rights Commission (EHRC) has previously issued five guides for public authorities in England giving advice on the equality duty:
- The essential guide to the public sector equality duty
 - Meeting the equality duty in policy and decision-making
 - Engagement and the equality duty
 - Equality objectives and the equality duty

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- Equality information and the equality duty

222 The essential guide provides an overview of the equality duty requirements including the general equality duty, the specific duties and who they apply to. It covers what public authorities should do to meet the duty including steps that are legally required, as well as recommended actions. The other four documents provide more detailed guidance on key areas and advice on good practice. Further information and resources are available at: <https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty-guidance>

223 The planning issues set out above do not include any factors that relate specifically to any of the equalities categories set out in the Act, and therefore it has been concluded that there is no impact on equality.

9 HUMAN RIGHTS IMPLICATIONS

224 In determining this application the Council is required to have regard to the provisions of the Human Rights Act 1998. Section 6 of the Human Rights Act 1998 prohibits authorities (including the Council as local planning authority) from acting in a way which is incompatible with the European Convention on Human Rights. "Convention" here means the European Convention on Human Rights, certain parts of which were incorporated into English law under the Human Rights Act 1998. Various Convention rights are likely to be relevant including

- Article 8: Respect for your private and family life, home and correspondence
- Protocol 1, Article 1: Right to peaceful enjoyment of your property

225 This report has outlined the consultation that has been undertaken on the planning application and the opportunities for people to make representations to the Council as Local Planning Authority.

226 Members need to satisfy themselves that the potential adverse amenity impacts are acceptable and that any potential interference with the above Convention Rights will be legitimate and justified. Both public and private interests are to be taken into account in the exercise of the Local Planning Authority's powers and duties. Any interference with a Convention right must be necessary and proportionate. Members must therefore, carefully consider the balance to be struck between individual rights and the wider public interest.

227 This application has the legitimate aim of providing a new building with employment uses. The rights potentially engaged by this application, including Article 8 and Protocol 1 are not considered to be unlawfully interfered with by this proposal.

10 LEGAL AGREEMENT

228 The National Planning Policy Framework (NPPF) states that in dealing with planning applications, local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It further states that where obligations are being sought or revised, local planning authorities should take account of

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. The NPPF also sets out that planning obligations should only be secured when they meet the following three tests:

- (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

229 Paragraph 122 of the Community Infrastructure Levy Regulations (April 2010) puts the above three tests on a statutory basis, making it illegal to secure a planning obligation unless it meets the three tests.

230 A Section 106 Agreement is considered necessary to make the development acceptable. The following Heads of terms are deemed necessary:

231 **Carbon Offset Payment**

232 **Section 278 Agreement for Highways improvement works:**

- Construction of bellmouth accesses with associated dropped kerbs, tactile paving and double yellow lines around the access points.
- Improvement works to the Burnt Ash Hill / Holme Lacey road junction, including a raised table crossing, to slow speeds when vehicles are manoeuvring through the junction, and reduce conflict with cyclists.
- Traffic calming measures are also required at the Holme Lacey road / Dallinger road junction to reduce vehicle speed in the vicinity of the vehicle exit point on Holme Lacey road.
- Additional cycle route signing and/or road markings to be provided on Holme Lacey road to reinforce the presence of cyclists in the vicinity of the application site.
- An independent Road Safety Audit to be produced in association with the works.

233 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).

11 CONCLUSION

234 This application has been considered in the light of policies set out in the development plan and other material considerations.

235 There are no in-principle concerns against demolition of existing buildings, and no land use issues associated with the proposed builder's merchant use across the site. The retention of the whole site as an employment location, facilitated through the construction of a new, fit for purpose building, and an amended site layout is significant planning merit.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- 236 The proposed new building would have an acceptable design, and would not harm the character of the surrounding area, nor the amenity of neighbours.
- 237 The impact to the local highway network would be acceptable, subject to conditions, as would the impact to the natural environment.
- 238 The proposal is considered to represent a sustainable form of development, and officers therefore recommend approval, subject to a section 106 agreement, and the conditions outlined below.

12 RECOMMENDATION

- 239 That the Committee resolve to **GRANT** planning permission subject to a S106 Legal Agreement and to the following conditions and informatives:

12.1 CONDITIONS

- 1 The development to which this permission relates must be begun not later than the expiration of three years beginning with the date on which the permission is granted.

Reason: As required by Section 91 of the Town and Country Planning Act 1990.

- 2 The development shall be carried out strictly in accordance with the application plans, drawings and documents hereby approved and as detailed below:

External Storage Plan 2.3; Proposed-Yard-Racking 2.3; Stock Sections and Elevations Received 21 October 2021;

2001-PL-G Received 8 October 2021;

Transport Technical Note (Coswold Transport Planning, August 2021); Response to Design Comments (Quod, July 2020); 3D Rendering images of proposal Received 18 August 2021;

Flood Risk Assessment/Drainage Strategy Rev.3 (Fairhurst, 27 July 2021); 137763-C-0501 Rev.P3 Received 27 July 2021;

1001-PL-B; 1002-PL-A; 1003-PL-A; 1004-PL-A; 1005-PL-A; 2002-PL-C; 3001-PL-B; 3501-PL-C; 4001-PL-C; 4002-PL-C; 5001-PL_A; 22157-DWG-EX-00001 Rev.00; Ecological Assessment (Ecology Solutions, October 2020); Sustainability and Energy Report (The Engineering Workshop LLP, 17th September 2020); Ground Investigation Report (Soiltechnics, October 2020); Remediation Strategy Report (Soiltechnics, October 2020); Air Quality Assessment (WYG, October 2020); Noise Assessment (WYG, October 2020); BREEAM Scoring Schedule (Synergy, 25 October 2020); Transport Statement (Coswold Transport Planning, September 2020); Tree Survey Report (Encon, 23 September 2020); BREEAM and Light Pollution Compliance Summary (Whitecroft, 21 September 2020); Planning Statement (Quod, October 2020)

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

Reason: To ensure that the development is carried out in accordance with the approved documents, plans and drawings submitted with the application and is acceptable to the local planning authority.

- 3
1. Prior to the commencement of development, a Dust Management Plan (DMP), based on an AQDRA (Air Quality and Dust Risk Assessment), shall be submitted to and approved, in writing, by the local planning authority. The DMP shall be in accordance with The Control of Dust and Emissions during Construction and Demolition SPG 2014. The DMP will need to detail the measures to reduce the impacts during the construction phase.

 2. The development shall be undertaken in accordance with the approved plan.

Reason: In order that the local planning authority may be satisfied that the demolition and construction process is carried out in a manner which will minimise possible noise, disturbance and pollution to neighbouring properties and to comply with Policy T7 Deliveries, servicing and construction of the London Plan (March 2021).

4 No development shall commence on site until such time as a Construction Management Plan has been submitted to and approved in writing by the local planning authority. The plan shall cover:-

- (a) Dust mitigation measures.
- (b) The location and operation of plant and wheel washing facilities
- (c) Details of best practical measures to be employed to mitigate noise and vibration arising out of the construction process
- (d) Details of construction traffic movements including cumulative impacts which shall demonstrate the following:-
 - (i) Rationalise travel and traffic routes to and from the site.
 - (ii) Provide full details of the number and time of construction vehicle trips to the site with the intention and aim of reducing the impact of construction related activity.
 - (iii) Measures to deal with safe pedestrian movement.
- (e) Security Management (to minimise risks to unauthorised personnel).
- (f) Details of the training of site operatives to follow the Construction Management Plan requirements and any Environmental Management Plan requirements (delete reference to Environmental Management Plan requirements if not relevant).

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

Reason: In order that the local planning authority may be satisfied that the demolition and construction process is carried out in a manner which will minimise possible noise, disturbance and pollution to neighbouring properties and to comply with Policy SI1 Improving air quality and Policy T7 Deliveries, servicing and construction of the London Plan (March 2021).

5 The development hereby permitted shall not begin until a scheme to deal with contamination of land/ground gas/controlled waters in areas not investigated has been submitted to and approved in writing by the local planning authority. The scheme shall include all of the following measures, unless the local planning authority dispenses with any such requirement specifically in writing:

1. No development or phase of development (including demolition of existing buildings and structures, except where prior agreement with the Council for site investigation enabling works has been received) shall commence until-

A further investigation report (Based on the Ground Investigation Report by Soiltechnics) to characterise and risk assess the site in areas not investigated which shall include the gas, hydrological and contamination status, specifying rationale; and recommendations for treatment for contamination encountered (whether by remedial works or not) has been submitted, (including subsequent correspondences as being necessary or desirable for the remediation of the site) to and approved in writing by the Council.

- (b) If during any works on the site, contamination is encountered which has not previously been identified ("the new contamination") the Council shall be notified immediately and the terms of paragraph (a), shall apply to the new contamination. No further works shall take place on that part of the site or adjacent areas affected, until the requirements of paragraph (a) have been complied with in relation to the new contamination.

- (c) The development or phase of development shall not be occupied until a closure report for the development or phase has been submitted to and approved in writing by the Council.

This shall include verification of all measures, or treatments as required in (Section (a) and relevant correspondence (including other regulating authorities and stakeholders involved with the remediation works) to verify compliance requirements, necessary for the remediation of the site have been implemented in full.

The closure report shall include verification details of both the remediation and post-remediation sampling/works, carried out (including waste materials removed from the site); and before placement of any soil/materials is undertaken on site, all imported or reused soil material must conform to current soil quality requirements as agreed by the authority. Inherent to the above, is the provision of any required documentation, certification and monitoring, to facilitate condition requirements.

Reason: To ensure that the local planning authority may be satisfied that potential site contamination is identified and remedied in view of the historical use(s) of the site, which may have included industrial processes and to comply with Saved Policy ENV.PRO 10 Contaminated Land in the Unitary Development Plan

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

(July 2004) and the sections 183- 188 of the 2021 National Planning Policy Framework.

- 6 (a) The rating level of the noise emitted from fixed plant on the site shall be 5dB below the existing background level at any time. The noise levels shall be determined at the façade of any noise sensitive property. The measurements and assessments shall be made according to BS4142:2014.
- (b) No development above ground level shall commence until details of a scheme complying with paragraph (a) of this condition have been submitted to and approved in writing by the local planning authority.
- (c) The development shall not be occupied until the scheme approved pursuant to paragraph (b) of this condition has been implemented in its entirety. Thereafter the scheme shall be maintained in perpetuity.

Reason: To safeguard the amenities of the adjoining premises and the area generally and to comply with DM Policy 26 Noise and vibration of the Development Management Local Plan (November 2014).

- 7 (a) The buildings hereby approved shall achieve a minimum BREEAM Rating of 'Excellent'.
- (b) Prior to completion of the superstructure a Design Stage Certificate for each building (prepared by a Building Research Establishment qualified Assessor) shall be submitted to and approved in writing by the local planning authority to demonstrate compliance with part (a).
- (c) Within 3 months of occupation of any of the buildings, evidence shall be submitted in the form of a Post Construction Certificate (prepared by a Building Research Establishment qualified Assessor) to demonstrate full compliance with part (a) for that specific building.

Reason: To comply with Policy SI 2 Minimising greenhouse gas emissions of the London Plan (March 2021) and Core Strategy Policy 7 Climate change and adapting to the effects, Core Strategy Policy 8 Sustainable design and construction and energy efficiency (2011).

- 8 The development shall be carried out in accordance with the submitted scheme for surface water management documents: Flood Risk Assessment / Drainage Strategy Revision 3 (Fairhurst, 27 July 2021); Plan No. 137763-C-0501 Rev.P3 Received 27 July 2021, and thereafter the approved scheme is to be retained in accordance with the details therein.

Reason: To prevent the increased risk of flooding and to improve water quality in accordance with Policy SI 12 Flood risk management in the London Plan (March 2021)

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

and Objective 6: Flood risk reduction and water management and Core Strategy Policy 10: Managing and reducing the risk of flooding (2011).

- 9 (a) No piling or any other foundation designs using penetrative methods shall take place, other than with the prior written approval of the local planning authority
- (b) Details of any such operations must be submitted to and approved in writing by the local planning authority prior to commencement of development on site and shall be accompanied by details of the relevant penetrative methods.
- (c) Any such work shall be carried out only in accordance with the details approved under part (b).

Reason: To prevent pollution of controlled waters and to comply with Core Strategy (2011) Policy 11 River and waterways network and Development Management Local Plan (November 2014) DM Policy 28 Contaminated land.

10. No development above ground shall commence on site until a detailed schedule and specification of all external materials and finishes, windows and external doors and roof coverings to be used on the building have been submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the local planning authority may be satisfied as to the external appearance of the building(s) and to comply with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and Development Management Local Plan (November 2014) DM Policy 30 Urban design and local character.

- 11 (a) No development shall commence until an updated Air Quality Assessment and an Air Quality Neutral Assessment have been submitted to and approved in writing by the local planning authority.

(b) The Air Quality Assessments will need to be prepared in accordance with best practice guidance, utilise an appropriate air quality model and/or emissions assessment tool to predict air quality concentrations at agreed receptor locations.

Reason: To manage and prevent further deterioration of existing low quality air across London, and in order that the local planning authority may be satisfied that the development is not going to result in significant health impacts to existing and future residents from a deterioration in local air quality and to comply with Development Management Local Plan (November 2014) Policy 23 Air quality.

12. (a) Prior to first occupation, full details of the cycle parking facilities shall be submitted to and approved in writing by the local planning authority.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

(b) No development shall commence on site until the full details of the cycle parking facilities have been submitted to and approved in writing by the local planning authority.

(c) All cycle parking spaces shall be provided and made available for use prior to occupation of the development and maintained thereafter.

Reason: In order to ensure adequate provision for cycle parking and to comply with Policy T5 cycling and Table 10.2 of the London Plan (March 2021) and Policy 14: Sustainable movement and transport of the Core Strategy (2011).

13 (a) Prior to above ground works drawings showing hard landscaping of any part of the site not occupied by buildings (including details of the permeability of hard surfaces) shall be submitted and approved in writing by the local planning authority.

(b) All hard landscaping works which form part of the approved scheme under part (a) shall be completed prior to occupation of the development.

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Policies SI 12 Flood risk management in the London Plan (March 2021), Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and Development Management Local Plan (November 2014) Policy 25 Landscaping and trees, and DM Policy 30 Urban design and local character.

14 Prior to commencement of above ground-works, details of the acoustic fencing to be installed between the site and adjoining residential properties shall be submitted to and approved in writing by the local planning authority.

Reason: To ensure the acoustic fencing is sufficient to mitigate against the impacts of noise arising from the use of the site, in accordance with Paragraph 185 of the National Planning Policy Framework (2021), and Policy 26 Noise and vibration of the Development Management Local Plan (November 2014).

15. (a) A scheme of soft landscaping (including details of any trees or hedges to be retained and proposed plant numbers, species, location and size of trees and tree pits) and details of the management and maintenance of the landscaping for a period of five years shall be submitted to and approved in writing by the local planning authority prior to construction of the above ground works.

(b) All planting, seeding or turfing shall be carried out in the first planting and seeding seasons following the completion of the development, in accordance with the approved scheme under part (a). Any trees or plants which within a period of five years from the completion of the development die, are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species.

Reason: In order that the local planning authority may be satisfied as to the details of the proposal and to comply with Core Strategy Policy 12 Open space and

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

environmental assets, Policy 15 High quality design for Lewisham of the Core Strategy (June 2011), and DM Policy 25 Landscaping and trees and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

16. (a) Details of the proposed boundary treatments including any gates, walls or fences shall be submitted to and approved in writing by the local planning authority prior to construction of the above ground works.

(b) The approved boundary treatments shall be implemented prior to occupation of the buildings and retained in perpetuity.

Reason: To ensure that the boundary treatment is of adequate design in the interests of visual and residential amenity and to comply with Policy 15 High quality design for Lewisham of the Core Strategy (June 2011) and DM Policy 30 Urban design and local character of the Development Management Local Plan (November 2014).

17. Details of the number and location of the bat boxes to be provided as part of the development hereby approved shall be submitted to and approved in writing by the local planning authority prior to commencement of above ground works and shall be installed before occupation of the building and maintained in perpetuity.

Reason: To comply with Policy 12 Open space and environmental assets of the Core Strategy (June 2011), and DM Policy 24 Biodiversity, living roofs and artificial playing pitches and local character of the Development Management Local Plan (November 2014).

- 18 (a) Prior to occupation of the development a scheme for any external lighting that is to be installed at the site, including measures to prevent light spillage shall be submitted to and approved in writing by the local planning authority.

(b) Any such external lighting as approved under part (a) shall be installed in accordance with the approved drawings and such directional hoods shall be retained permanently.

(c) The applicant should demonstrate that the proposed lighting is the minimum needed for security and working purposes and that the proposals minimise pollution from glare and spillage.

Reason: In order that the local planning authority may be satisfied that the lighting is installed and maintained in a manner which will minimise possible impacts to biodiversity, including bats, minimise light pollution to the night sky and neighbouring properties and to comply with DM Policy 24 Biodiversity, living roofs and artificial playing pitches DM Policy 27 Lighting of the Development Management Local Plan (November 2014).

19. (a) The development shall not be occupied until a Delivery and Servicing Plan has been submitted to and approved in writing by the local planning authority.

(b) The plan shall demonstrate the expected number and time of delivery and servicing trips to the site, with the aim of reducing the impact of servicing activity. It should

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

be in accordance with in Transport for London's Delivery and Servicing Plan Guidance.

- (c) The approved Delivery and Servicing Plan shall be implemented in full accordance with the approved details from the first occupation of the development and shall be adhered to in perpetuity.

Reason: In order to ensure satisfactory vehicle management and to comply with Policy T7 Deliveries, servicing and construction of the London Plan (March 2021) and Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

20. (a) No part of the development hereby approved shall be occupied until such time as a staff and user's Travel Plan, in accordance with Transport for London's document 'Travel Planning for New Development in London' 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.
- (b) The Travel Plan shall specify initiatives to be implemented by the development to encourage access to and from 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.
- (c) Within the timeframe specified by (a) and (b), evidence shall be submitted to demonstrate compliance with the monitoring and review mechanisms agreed under parts (a) and (b).

Reason: In order that both the local planning authority may be satisfied as to the practicality, viability and sustainability of the Travel Plan for the site and to comply with Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

21. Loading and unloading of goods including fuel, shall only be carried out within the site and any servicing area shown upon drawing no. 2001-PL-G hereby approved, shall be retained permanently and left unobstructed at all times.

Reason: To avoid obstruction of neighbouring streets and to safeguard the amenities of adjacent premises in the interests of public safety and to comply with the Policy 14 Sustainable movement and transport of the Core Strategy (June 2011).

- 22 No deliveries in connection with construction works shall be taken at or despatched from the site other than between the hours of 8 am and 6 pm on Mondays to Fridays and 8 am and 1 pm on Saturdays and not at all on Sundays or Public Holidays.

No work shall take place on the site other than between the hours of 8 am and 6 pm on Mondays to Fridays and 8 am and 1 pm 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 Paragraph 170 of the National Planning Policy Framework and DM Policy 26 Noise and Vibration, and DM Policy 32 Housing design, layout and space standards of the Development Management Local Plan (November 2014).

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

23. No deliveries shall be taken at or despatched from the site other than between the hours of 7 am and 8 pm on Mondays to Fridays, 8 am and 1 pm on Saturdays, or at any time on Sundays or Public Holidays.

Reason: In order to safeguard the amenities of adjoining residents and to comply with Paragraph 170 of the National Planning Policy Framework, and DM Policy 26 Noise and Vibration, and DM Policy 32 Housing design, layout and space standards of the Development Management Local Plan (November 2014).

24. None of the trees shown as being retained on the permitted plans shall be lopped or felled without the prior written consent of the local planning authority

Reason: To comply with Policy 12 Open space and environmental assets of the Core Strategy (June 2011) and policies DM 25 Landscaping and trees and 30 Urban design and local character of the Development Management Local Plan (November 2014).

25. Stock stored adjacent to the shared boundaries with residential properties, shall not exceed the height of 3m.

Reason: To ensure stock storage does not result in harmful impacts to neighbouring residential amenity, in line with Policy 15 High quality design for Lewisham of the Core Strategy (2011).

26. a. Prior to commencement of above ground work, details of security measures in line with the standards set out by 'Secured by Design' shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Metropolitan Police.
- b. The measures must be implemented prior to occupation of the building in accordance with the details approved under part (a).
- c. Prior to commencement of the use, confirmation that the standards recommended by Secure by Design for that building has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To minimise security risks to the proposed development, in compliance with Policy D11 Safety, security and resilience to emergency of the London Plan (March 2021).

12.2 INFORMATIVES

- A. **Positive and Proactive Statement:** The Council engages with all applicants in a positive and proactive way through specific pre-application enquiries and the detailed advice available on the Council's website. On this particular application, positive and proactive discussions took place with the applicant prior to the application being submitted through a pre-application discussions and positive discussions took place during the course of assessment.

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

- B. You are advised that all construction work should be undertaken in accordance with the "London Borough of Lewisham Code of Practice for Control of Pollution and Noise from Demolition and Construction Sites" available on the Lewisham web page.
- C. You are advised to contact the Council's Drainage Design team on 020 8314 2036 prior to the commencement of work.
- D. In preparing the scheme of dust minimisation, reference shall be made to the London Councils Best Practice Guide: The Control of Dust and Emissions from Construction and Demolition. All mitigation measures listed in the Guide appropriate to the size, scale and nature of the development will need to be included in the dust minimisation scheme.
- E. Assessment of the sound insulation scheme should be carried out by a suitably qualified acoustic consultant.
- F. The applicant be advised that the details to be submitted pursuant to this permission should have regard to the principles of energy and natural resource efficiency through their design, orientation, density and location, in compliance with Policy 8 Sustainable design and construction and energy efficiency of the adopted Core Strategy (June 2011).
- G. Thames Water advise the following:

Waste Comments

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. [https://urldefense.com/v3/ https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services_!!CVb4j_0G!DbllkgtA1lioX9YUa6XNnsi7mrSoZHMZOqCrHabqn3OcAwRMgKB1046qj4xW23e5WqKEvQ\\$](https://urldefense.com/v3/https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services_!!CVb4j_0G!DbllkgtA1lioX9YUa6XNnsi7mrSoZHMZOqCrHabqn3OcAwRMgKB1046qj4xW23e5WqKEvQ$)

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via [https://urldefense.com/v3/ http://www.thameswater.co.uk ;!!CVb4j_0G!DbllkgtA1lioX9YUa6XNnsi7mrSoZHMZOqCrHabqn3OcAwRMgKB1046qj4xW23fTTfEgcA\\$](https://urldefense.com/v3/http://www.thameswater.co.uk/!CVb4j_0G!DbllkgtA1lioX9YUa6XNnsi7mrSoZHMZOqCrHabqn3OcAwRMgKB1046qj4xW23fTTfEgcA$) . Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. [https://urldefense.com/v3/ https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes ;!!CVb4j_0G!DbllkgtA1lioX9YUa6XNnsi7mrSoZHMZOqCrHabqn3OcAwRMgKB1046qj4xW23fccwZApq\\$](https://urldefense.com/v3/https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes;!!CVb4j_0G!DbllkgtA1lioX9YUa6XNnsi7mrSoZHMZOqCrHabqn3OcAwRMgKB1046qj4xW23fccwZApq$) .

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. [https://urldefense.com/v3/ https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes ;!!CVb4j_0G!DbllkgtA1lioX9YUa6XNnsi7mrSoZHMZOqCrHabqn3OcAwRMgKB1046qj4xW23fccwZApq\\$](https://urldefense.com/v3/https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes;!!CVb4j_0G!DbllkgtA1lioX9YUa6XNnsi7mrSoZHMZOqCrHabqn3OcAwRMgKB1046qj4xW23fccwZApq$)

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>

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.

- H. Access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for firefighting purposes must be provided.
- I. As well as contacting Network Rail's ASPRO Team, the applicant / developer must also follow the Network Rail Asset Protection informatives (compliance with the informatives does not remove the need to contact ASPRO). The developer must ensure that their proposal, both during construction and after completion does not:
1. encroach onto Network Rail land
 2. affect the safety, operation or integrity of the company's railway and its infrastructure
 3. undermine its support zone
 4. damage the company's infrastructure
 5. place additional load on cuttings
 6. adversely affect any railway land or structure
 7. over-sail or encroach upon the air-space of any Network Rail land
 8. cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

Is this report easy to understand?

Please give us feedback so we can improve.

Go to <https://lewisham.gov.uk/contact-us/send-us-feedback-on-our-reports>