

From: [REDACTED]
To: [Riverside Energy Park](#)
Cc: [REDACTED]
Subject: Riverside Energy Park Belvedere
Date: 03 October 2019 22:35:50
Attachments: [Westminster Waste appln.zip](#)

EN010093 - Riverside Energy Park Project. At Belvedere. Our Ref: **20022234**

Dear Sir,

I would like to highlight the Planning application before the London Borough of Bexley, which was mentioned by Tony Fairburn in his email to the Inspector today.

This is a plan to bring waste from London for recycling, close to the Cory site at Belvedere. This is south of the incinerator site, in the same council ward. All Recycling site traffic would have to join the A2016 main road, very near to the junction used by traffic from the Cory location in Norman Rd. This could be a total of 164 further lorries per day in the same small area.

I feel this should be taken into consideration when reading the proposed Cory CTMP and operational TMP submissions.

Yours faithfully,
Mrs M J White

Reference -

W0010/J00142/PS-V1 19 Westminster Waste Limited
December 2018 Page 18 Section 6

Extract - Traffic
(6.26)

Based on the proposed operation involving 40 HGVs, the following vehicle movements are anticipated:

Each Skip/Roll-on Roll off Vehicle makes 2 deliveries per day 80 Loads in 80 trips out.
Artic Loads to remove waste 2 loads per day 2 loads out 2 trips in

Total HGV movements per day 164
Total car movements per day 60.



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Client: **Westminster Waste Limited**

Project: Planning Application Boundary
 Former Conway Yard
 Mulberry Way
 Belvedere
 DA17 6AN

INTEGRATED SKILLS LIMITED

BELL HOUSE
 32 BELL STREET
 ROMSEY
 SO15 8GW

TEL: 02380 737 983
 EMAIL: ukinfo@integrated-skills.com
 (www.integrated-skills.com)

Date: **Nov 2018**

Scale: **1:1000@A3**

Dwg: **WWL-MW-APP-01**



For office use

Civic Offices, 2 Watling Street, Bexleyheath DA6 7AT

020 8303 7777 developmentcontrol@bexley.gov.uk www.bexley.gov.uk

Application for Planning Permission.
Town and Country Planning Act 1990

Publication of applications on planning authority websites.

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

1. Site Address

Number	
Suffix	
Property name	Office Building
Address line 1	Mulberry Way
Address line 2	
Address line 3	
Town/city	Belvedere
Postcode	DA17 6AN

Description of site location must be completed if postcode is not known:

Easting (x)	550473
Northing (y)	179878

Description

2. Applicant Details

Title	Mr
First name	
Surname	Moule
Company name	
Address line 1	Westminster Waste Limited
Address line 2	Maybank Wharf
Address line 3	
Town/city	Charlton
Country	

2. Applicant Details

Postcode	<input type="text" value="SE7 8NW"/>
Primary number	<input type="text"/>
Secondary number	<input type="text"/>
Fax number	<input type="text"/>
Email address	<input type="text"/>

Are you an agent acting on behalf of the applicant?

Yes No

3. Agent Details

Title	<input type="text"/>
First name	<input type="text" value="Alison"/>
Surname	<input type="text" value="Crooks"/>
Company name	<input type="text" value="Integrated Skills"/>
Address line 1	<input type="text" value="Integrated Skills Limited"/>
Address line 2	<input type="text" value="Bell House"/>
Address line 3	<input type="text" value="32 Bell Street"/>
Town/city	<input type="text" value="Romsey"/>
Country	<input type="text" value="United Kingdom"/>
Postcode	<input type="text" value="SO51 8GW"/>
Primary number	<input type="text" value="02380737983"/>
Secondary number	<input type="text"/>
Fax number	<input type="text"/>
Email	<input type="text" value="acrooks@integrated-skills.com"/>

4. Site Area

What is the measurement of the site area?
(numeric characters only).

Unit

5. Description of the Proposal

Please describe details of the proposed development or works including any change of use.

If you are applying for Technical Details Consent on a site that has been granted Permission In Principle, please include the relevant details in the description below.

Has the work or change of use already started?

Yes No

6. Existing Use

Please describe the current use of the site

The site is currently occupied by FM Conway, although the occupants are vacating the site. The site has been used as a highway service depot.

Is the site currently vacant? Yes No

Does the proposal involve any of the following? If Yes, you will need to submit an appropriate contamination assessment with your application.

Land which is known to be contaminated Yes No

Land where contamination is suspected for all or part of the site Yes No

A proposed use that would be particularly vulnerable to the presence of contamination Yes No

7. Materials

Does the proposed development require any materials to be used in the build? Yes No

Please provide a description of existing and proposed materials and finishes to be used in the build (including type, colour and name for each material):

Walls	
Description of existing materials and finishes (optional):	Steel Clad
Description of proposed materials and finishes:	Aluminium clad

Roof	
Description of existing materials and finishes (optional):	steel clad
Description of proposed materials and finishes:	PVC Polyester

Are you supplying additional information on submitted plans, drawings or a design and access statement? Yes No

If Yes, please state references for the plans, drawings and/or design and access statement

WWL/MW/LOC/01Location Plan
WWL/MW/APP/01Application Boundary
WWL/MW/LAY/01Existing Layout
WWL/MW/LAY/02Proposed Layout
WWL/MW/LAY/03Building A Layout
WWL/MW/LAY/04Building B Layout
WWL/MW/ELE/01Weighbridge and Transport Office
ST-18-PT-30559.idwElevation Building A
30559Elevation Building B
ST-16-30559Elevation Building C
Planning Statement
Flood Risk Assessment

8. Pedestrian and Vehicle Access, Roads and Rights of Way

Is a new or altered vehicular access proposed to or from the public highway? Yes No

Is a new or altered pedestrian access proposed to or from the public highway? Yes No

Are there any new public roads to be provided within the site? Yes No

Are there any new public rights of way to be provided within or adjacent to the site? Yes No

Do the proposals require any diversions/extinguishments and/or creation of rights of way? Yes No

9. Vehicle Parking

Is vehicle parking relevant to this proposal?

Yes No

10. Trees and Hedges

Are there trees or hedges on the proposed development site?

Yes No

And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character?

Yes No

If Yes to either or both of the above, you may need to provide a full tree survey, at the discretion of your local planning authority. If a tree survey is required, this and the accompanying plan should be submitted alongside your application. Your local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.

11. Assessment of Flood Risk

Is the site within an area at risk of flooding? (Refer to the Environment Agency's Flood Map showing flood zones 2 and 3 and consult Environment Agency standing advice and your local planning authority requirements for information as necessary.)

Yes No

If Yes, you will need to submit a Flood Risk Assessment to consider the risk to the proposed site.

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?

Yes No

Will the proposal increase the flood risk elsewhere?

Yes No

How will surface water be disposed of?

Sustainable drainage system

Existing water course

Soakaway

Main sewer

Pond/lake

12. Biodiversity and Geological Conservation

Is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, or on land adjacent to or near the application site?

To assist in answering this question correctly, please refer to the help text which provides guidance on determining if any important biodiversity or geological conservation features may be present or nearby; and whether they are likely to be affected by the proposals.

a) Protected and priority species:

- Yes, on the development site
 Yes, on land adjacent to or near the proposed development
 No

b) Designated sites, important habitats or other biodiversity features:

- Yes, on the development site
 Yes, on land adjacent to or near the proposed development
 No

c) Features of geological conservation importance:

- Yes, on the development site
 Yes, on land adjacent to or near the proposed development
 No

13. Foul Sewage

Please state how foul sewage is to be disposed of:

- Mains Sewer
- Septic Tank
- Package Treatment plant
- Cess Pit
- Other
- Unknown

Other

Are you proposing to connect to the existing drainage system? Yes No Unknown

14. Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste? Yes No

If Yes, please provide details:

The site will be used to separate and store waste for recycling.

Have arrangements been made for the separate storage and collection of recyclable waste? Yes No

If Yes, please provide details:

The company has outlets for all waste separated.

15. Trade Effluent

Does the proposal involve the need to dispose of trade effluents or trade waste? Yes No

16. Residential/Dwelling Units

Due to changes in the information requirements for this question that are not currently available on the system, if you need to supply details of Residential/Dwelling Units for your application please follow these steps:

1. Answer 'No' to the question below;
2. Download and complete this supplementary information template (PDF);
3. Upload it as a supporting document on this application, using the 'Supplementary information template' document type.

This will provide the local authority with the required information to validate and determine your application.

Does your proposal include the gain, loss or change of use of residential units? Yes No

17. All Types of Development: Non-Residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace? Yes No

If you have answered Yes to the question above please add details in the following table:

Use Class	Existing gross internal floorspace (square metres)	Gross internal floorspace to be lost by change of use or demolition (square metres)	Total gross new internal floorspace proposed (including changes of use) (square metres)	Net additional gross internal floorspace following development (square metres)
B2 - General industrial	4141	4141	5150	1009
B1 (a) - Office (other than A2)	427	0	60	60
Total	4568	4141	5210	1069

For hotels, residential institutions and hostels please additionally indicate the loss or gain of rooms:

18. Employment

Will the proposed development require the employment of any staff?

Yes No

Please complete the following information regarding employees:

Type	Full-time	Part-time	Equivalent number of full-time
Proposed employees	40		

19. Hours of Opening

Are Hours of Opening relevant to this proposal?

Yes No

20. Industrial or Commercial Processes and Machinery

Please describe the activities and processes which would be carried out on the site and the end products including plant, ventilation or air conditioning. Please include the type of machinery which may be installed on site:

Bespoke waste processing equipment including trommel screen, conveyor belts and picking station.

Is the proposal for a waste management development?

Yes No

Please complete the following table

	The total capacity of the void in cubic metres, including engineering surcharge and making no allowance for cover or restoration material (or tonnes if solid waste or litres if liquid waste)	Maximum annual operational through put in tonnes (or litres if liquid waste)
Recycling facilities construction, demolition and excavation waste	1 Tonnes	150000 Tonnes

Please give maximum annual operational through-put of the following waste streams:

	Maximum annual operational through-put	
Construction, demolition and excavation	150000	Tonnes

If this is a landfill application you will need to provide further information before your application can be determined. Your waste planning authority should make it clear what information it requires on its website

21. Hazardous Substances

Does the proposal involve the use or storage of any hazardous substances?

Yes No

22. Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

Yes No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact? (Please select only one)

- The agent
- The applicant
- Other person

23. Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application?

Yes No

24. Authority Employee/Member

With respect to the Authority, is the applicant and/or agent one of the following:

- (a) a member of staff
- (b) an elected member
- (c) related to a member of staff
- (d) related to an elected member

It is an important principle of decision-making that the process is open and transparent.

Yes No

For the purposes of this question, "related to" means related, by birth or otherwise, closely enough that a fair-minded and informed observer, having considered the facts, would conclude that there was bias on the part of the decision-maker in the Local Planning Authority.

Do any of the above statements apply?

25. Ownership Certificates and Agricultural Land Declaration

CERTIFICATE OF OWNERSHIP - CERTIFICATE B - Town and Country Planning (Development Management Procedure) (England) Order 2015 Certificate under Article 14

I certify/The applicant certifies that I have/the applicant has given the requisite notice to everyone else (as listed below) who, on the day 21 days before the date of this application, was the owner* and/or agricultural tenant** of any part of the land or building to which this application relates.

* 'owner' is a person with a freehold interest or leasehold interest with at least 7 years left to run. ** 'agricultural tenant' has the meaning given in section 65(8) of the Town and Country Planning Act 1990

Owner/Agricultural Tenant

Name of Owner/Agricultural Tenant	H Company 5 Limited
Number	
Suffix	
House Name	
Address line 1	32 38 Scrutton Street
Address line 2	
Town/city	London
Postcode	EC2A 4RQ
Date notice served (DD/MM/YYYY)	23/01/2019

Person role

- The applicant
- The agent

Title

First name

Surname

Declaration date (DD/MM/YYYY)

Declaration made

26. Declaration

I/we hereby apply for planning permission/consent as described in this form and the accompanying plans/drawings and additional information. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.

Date (cannot be pre-application)

23/01/2019



Our ref:- 9150/JRS

Alison Crooks
Integrated Skills Ltd
Bell House
32 Bell Street
Romsey
Hampshire
SO51 8GW

18th January 2019

Dear Alison,

**Re:- Westminster Waste, Mulberry Way, Belvedere Industrial Estate, Bexley
Flood Risk Assessment**

CBL Consulting have been appointed to undertake a Flood Risk Assessment to support a planning application to relocate the Westminster Waste Facility to the former F Conway site accessed from Mulberry Way. This site currently has permissions in place for use classes B1 B2 & B8.

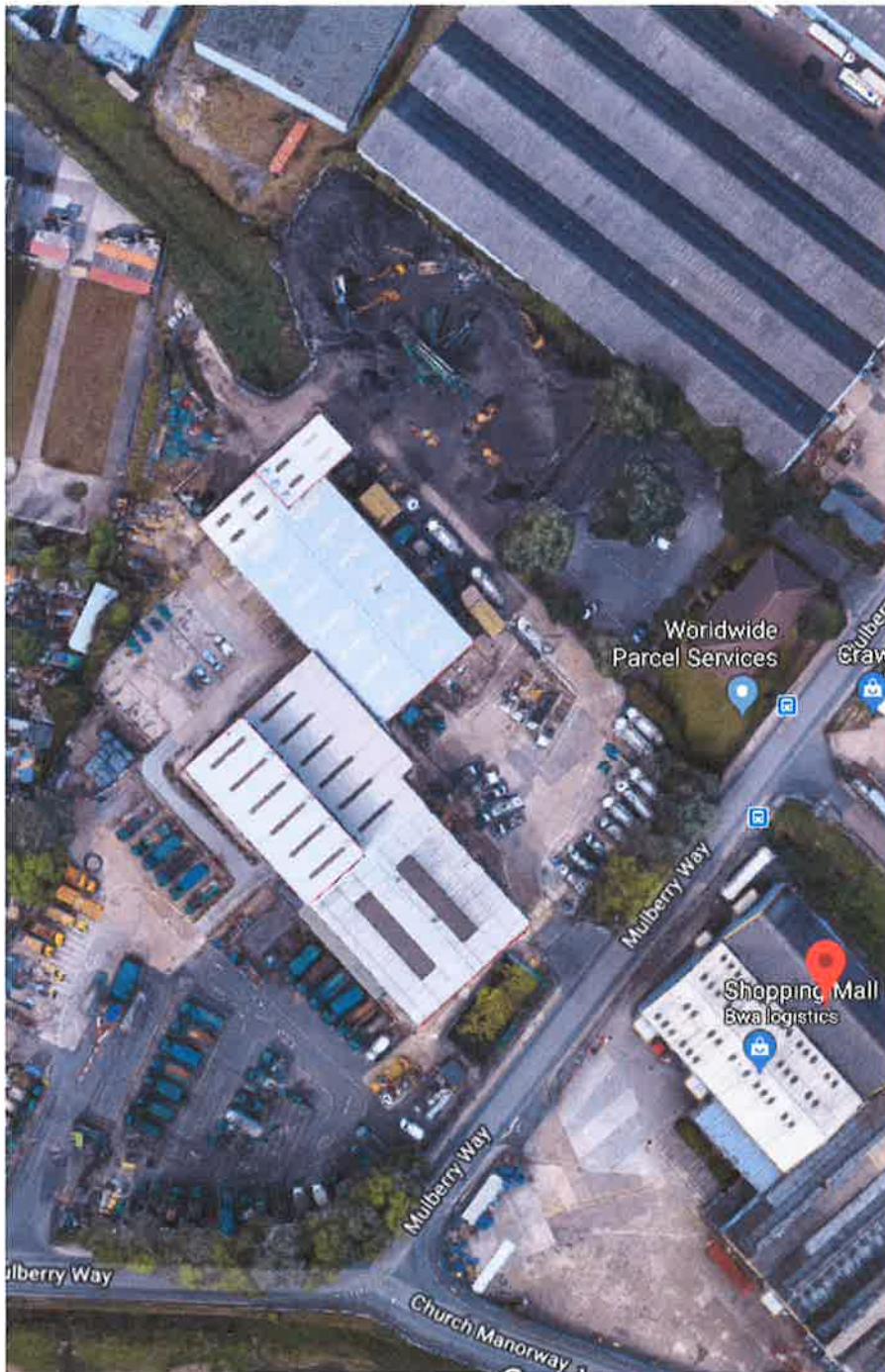
This Flood Risk Assessment has been prepared in accordance with the Environment Agency's Guidance Note 3, and in accordance with the National Planning Policy Framework which requires a flood risk to be undertaken to ensure flood risk to the proposed development is considered as well as the impact elsewhere, on both people and property.

It is a requirement within the FRA for developments to consider the potential risk of flooding over the expected lifetime of the development and any possible impacts on flood risk elsewhere, in terms of effects on run-off and flood flows. This should include the following considerations;

- The area liable to flooding.
- The current and future probability of flood occurrence.
- Extent and standard of flood defenses and their long-term effectiveness.
- Potential flood depths and rates of flow, including climate change and the nature and expected lifetime of the development.

Existing site details

The existing site occupies an area of approximately 22000 square metres which is primarily hard paved with a number of industrial buildings including a mezzanine and a two storey office block on the site.



It is proposed that the existing Westminster Waste buildings, currently located a Maybank Wharf, will be brought and installed on this site, to replace the existing buildings which will be demolished, with the exception of the current two storey office block which will remain.



Existing main access to the current site indicating existing industrial unit



Existing two storey office block which will remain on the site together with localised soft landscaping

The proposed development incorporates the installation of two new, temporary buildings as per the layout below, (which are currently sited at Maybank Wharf) as well as small modular buildings to form the weighbridge and office etc. Vehicle routing within the site is also to be re-arranged so as to ensure that HGVs are able more easily to access and egress without reversing.

As is noted in the planning statement, the overall number of HGV movements is likely to be substantially reduced from the current usage, and it is also noted that operations, rather being 24/7 will be confined to a more standard operational working day.

A comparison of existing and proposed building areas is set out below;

Building Reference	Dimensions (sqm)	Height (m)
Unit 1	1,107	9m (apex)
Unit 2	732	16m (apex)
Unit 3	1,785	10m (apex)
Mezzanine	517	Not relevant
Office	427	2 Storey

Existing Building Areas – The Office (Highlighted) remain in place

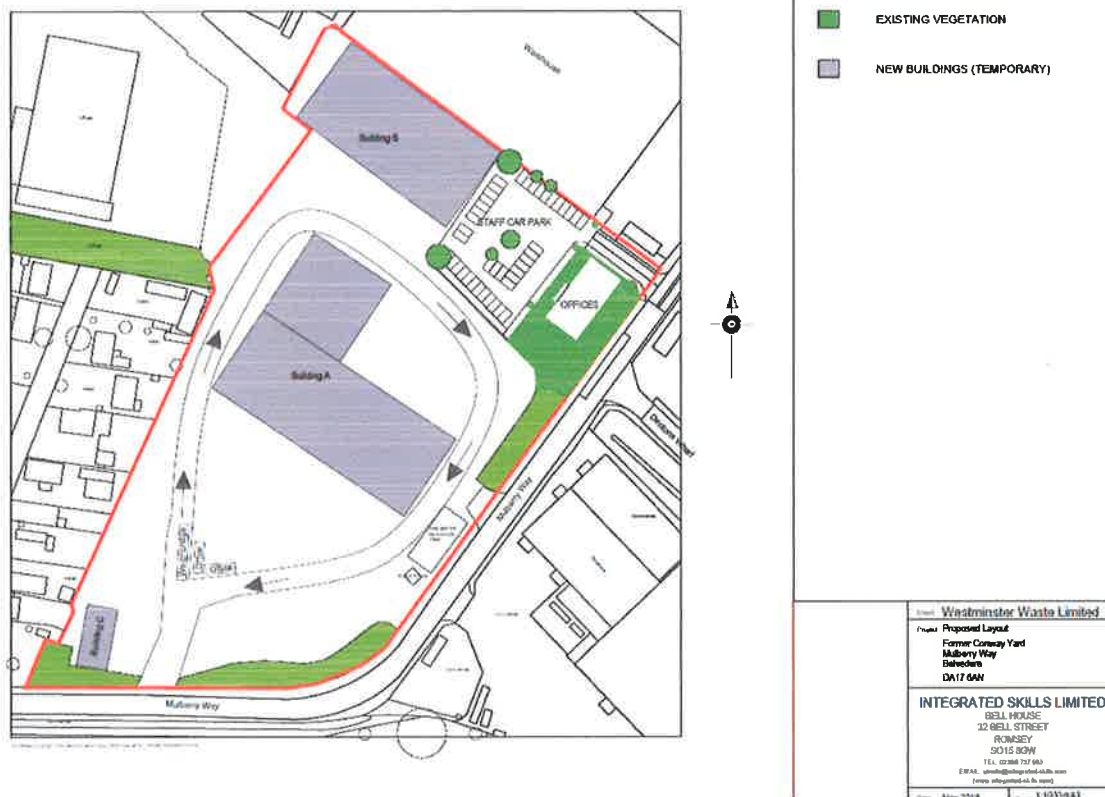
Building Reference	Dimensions (sqm)	Height (m)	Use
Building A	3,150	8m (eaves)	Receipt, storage and treatment of mixed C&D Waste
Building B	1,800	8m (eaves)	Receipt, storage and treatment of wood waste
Building C	200	5m (eaves)	Maintenance/workshop
Office	427	2 Storey	No change
Weighbridge Office (portacabin)	30	3	Office
Transport Office (portacabin)	30	3	Office

Proposed Building Areas – The two storey office remains in place

With regard to the building operations, the new constructions are temporary modular buildings without foundations and are fixed down to hardstandings.

On that basis it is not proposed to alter or remove the existing hardstanding at the southern end of the site.

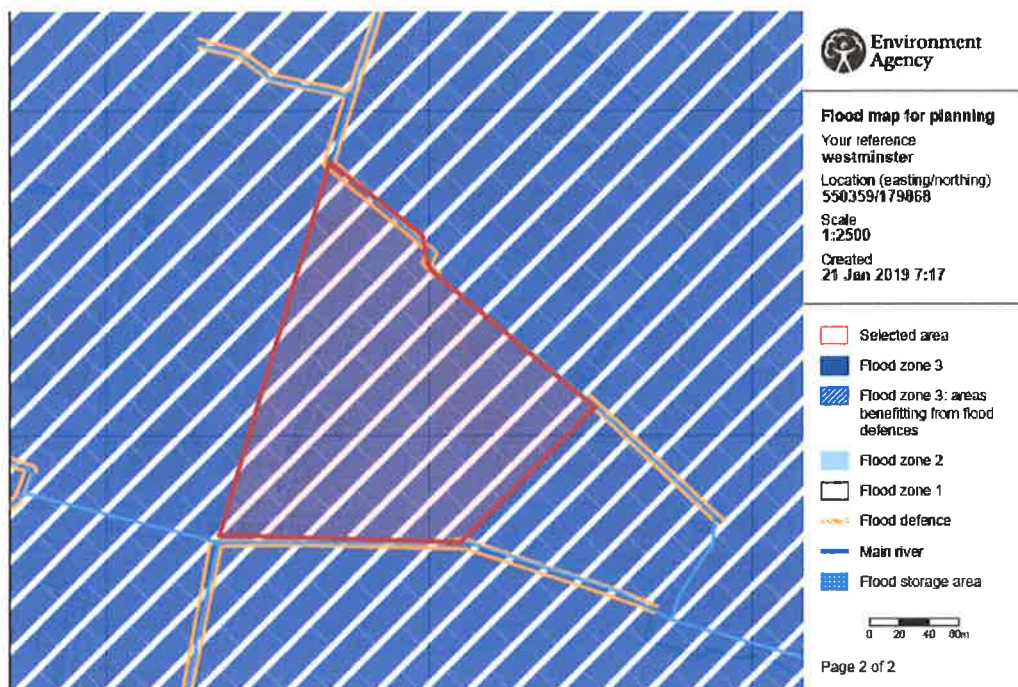
At the northern part of the site there is an area of land which it is proposed to cover and use as additional hardstanding so the net effect of the proposal is to increase the hardstanding area of the site.



Proposed site layout indicating circulation routes and building layouts

Planning Context

The site area forms part of the Belvedere Industrial area and it is located in a Strategic Industrial Area.



Extract from the Environment Agency Indicative Flood Mapping showing that the area lies within flood zone 3, but benefits from defences

The site lies downstream of the Thames barrier and is not therefore subject to quite the same prescriptive levels as upstream of the barrier where heights are required to be maintained at 5.28 metres

"Flood defences for the Thames Estuary have been built up over hundreds of years and have tended to respond to flood events by successively raising the height of flood defences walls and embankments. The current defences were constructed through the 1970s and 1980s in response to the tidal surge of 1953 and include the Thames Barrier. There are also many other flood gates and moveable structures that make up the defence system. This system of tidal flood defences was designed with knowledge of sea level rise and it made allowances for this. Therefore protection up to a 1 in 1000 (0.1%) event is estimated to be provided by the Thames Tidal Defences until 2030",

Extract from the London Region Flood Risk Appraisal 2014 review undertaken by the Greater London Authority

Under the National Planning Policy Framework it is a requirement to identify the flood zones and vulnerability classifications relevant to the proposed development based on current and future conditions.

The current flood zoning available from the Environment Agency is based on a consideration of areas assuming no defences and this indicates that the site itself lies within zone 3a.

There is a requirement to demonstrate that the site usage is appropriate to this category and also that Sequential and Exception tests have been passed as required.

With regard to the NPPF flood zones appropriate uses within flood zone 3a are less vulnerable and water compatible ones. Within the flood risk vulnerability classification waste treatment and minerals working and processing are treated as less vulnerable usages.

The proposal is for a change in use class and as a waste facility is classed as less vulnerable and is therefore an appropriate usage for zone 3a.

The current Bexley Plan indicates this as lying within a key industrial area

Drainage and water management issues

The existing site discharges via Thames Water foul and surface water sewers and consents are in place for these (see below).

Drainage

2.1 Does foul water from the property drain to a public sewer?

Records indicate that foul water from the property drains to a public sewer.

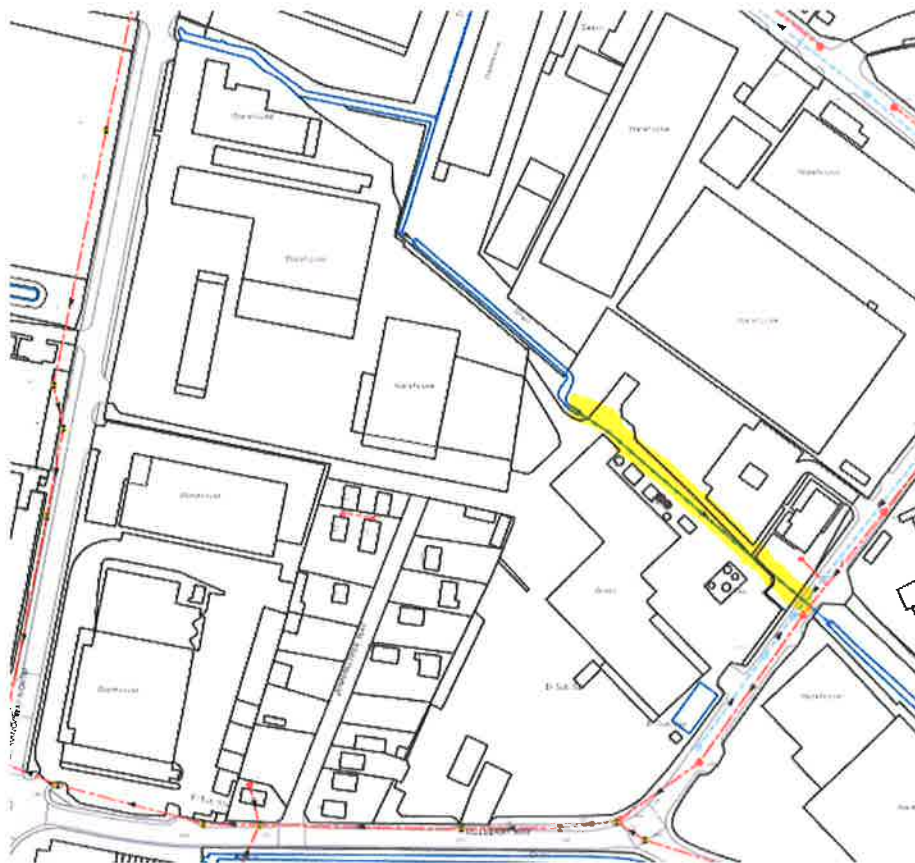
2.2 Does surface water from the property drain to a public sewer?

Records indicate that surface water from the property drains to a public sewer.

2.3 Is a surface water drainage charge payable?

Records indicate that a surface water charge is applicable at this property.

There is a culverted ditch/drain running through the site already and this can be seen on the Thames water asset search extract below.



Thames Water Site Layout indicating culverted surface water drain running below site

Foul Drainage

In terms of the foul drainage the proposed new buildings are required , as part of their operating licence to be provided with a sealed drainage system which is then disposed of to foul under licence. As the numbers of people using the site will potentially be reduced in comparison with the current scenario there will be a reduction in general foul water flows off site and these are not discussed further.

2.8	Is the building which is or forms part of the property, at risk of internal flooding due to overloaded public sewers?	Not At Risk
2.9	Please state the distance from the property to the nearest boundary of the nearest sewage treatment works.	2.352 Kilometres

Extract from commercial Thames Water search for this site, indicating that there is not a risk from sewer flooding for this site.

In terms of the surface water the current flows off site discharge into the Thames Water sewers off site. For the areas involved these flows are substantial, particularly considering that the critical 6 hour storm flow rainfall is approximately 63mm which based on the areas involved provides flows, at present, in the order of 12252 cubic metres off site from the hardstanding areas. This equates to approximately 567 litres per second for the critical 6 hour storm.

Reference has been made to greenfield flows off site and the hierarchy for managing surface water flows is set out below.

The London plan policy 5.13 is specifically in relation to sustainable drainage. This states that development should utilise SUDS unless there are practical reasons for not doing so.

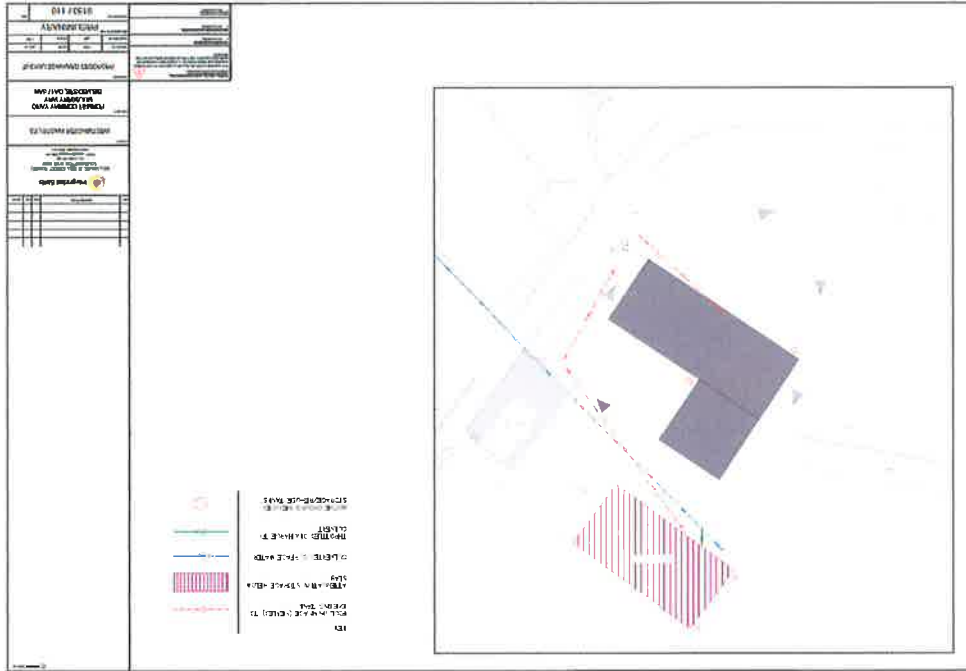
Greenfield run off rates should be aimed for and runoff should be managed as close as possible to its source

Bexley also requires the use of measures to sustainably manage surface water to achieve a reduction in run-off rates.

When reviewing the site itself there is a clear distinction of areas with the existing culverted surface water drain providing a cut off across the site in an southeast/northwest direction.

The proposed works for the site are to retain the existing hardstanding across the southern part of the site as existing and given the nature of the proposed usage the use of SUDS/source control from the existing hardstandings across this southern part of the site is unlikely to be achievable, although surface water will be intercepted prior

Culverted drain across site in relation to the proposed layout of the site



Surface water ditch immediately downstream of the site - Note how shallow this is relative to the surrounding levels.



to discharge. This will demonstrate a clear reduction in surface water to discharge to the sewer compared with the overall existing site.

Across the northern part of the site where hardstandings will be altered and extended to provide a footprint for the new building there is scope, albeit limited, to provide sustainable and gravity discharge.

For the whole site an assessment has been made of greenfield run-off rates based on approximately 2.1 hectares (allowing for the existing limited soft landscaping across the site near to the existing offices which will be retained.)

These rates are as set out below, based on the 2.1 hectare impermeable area assumed post development.

Greenfield runoff rates	Default	Edited
Qbar (l/s)	8.18	8.18
1 in 1 year (l/s)	6.95	6.95
1 in 30 years (l/s)	18.82	18.82
1 in 100 years (l/s)	26.1	26.1

To achieve these rates further assessment has shown that across the entire site the storage required for attenuation to greenfield rates would likely be as below.

Interception storage (m ³)	84	84
Attenuation storage (m ³)	1702	1702
Long term storage (m ³)	0	0
Treatment storage (m ³)	252	252
Total storage (excluding treatment) (m ³)	1786	1786

Following the required hierarchy using SUDS would be the preferred choice for the site. However the modular temporary building do not lend themselves to green roofs or walls and there are likely issues with excavating and discharging SUDS through an existing brownfield site, in particular with the relatively low lying nature of the site.

In an ideal world all infiltration systems maintain a clear buffer in excess of a metre above water table so as to ensure additional pathways for potential contamination are not included within the scheme.

The next option would be discharge through to a watercourse and as there is already a culverted system running across the site this is available and achievable and would assist in relieving pressure on the existing surface water sewers.

Proposed mitigation measures:

Dust suppression systems will be installed in both buildings and it is proposed to capture and store roof water for this purpose. The ground storage tanks will provide an immediate relief to the surface water system. These need not be substantial and will not form part of the overall discharge calculations.

Surface water from building B which is a new construction, built on a new hardstanding offers the best opportunity for management of clean surface water under gravity which is the most sustainable option. A crate or shallow precast pipe system, below the footprint of building B allows the option of up to approximately 700 cubic metres of storage and attenuation.

This is based on the usage of high load capacity crates of approximately 400mm depth, with 500mm cover over the top, which is a sensible minimum, even under a slab, whilst still allowing a discharge under gravity to the drainage running through the site. Based on the building area, and existing drainage levels to the car park, there is the potential to reduce and throttle outflows from the northern carpark, and building B to less than 2 litres per second per hectare which is in accordance with the NPPF and also less than the greenfield run-off rates from the site and this would appear to offer the best compromise whilst retaining the existing hardstanding areas across the southern part of the site.

Tidal Flood Risk

The major potential source of flooding occurs as a result of either overtopping or a breach in the existing defensive structure. The defences along the Thames are unusual in that there is a statutory requirement and riparian responsibility to maintain a specific height along the defence itself.

This defence level is due to be increased over the next few decades. It is not therefore considered that overtopping should pose any substantial risk to the site, certainly within the lifespan of the proposed works.

It should also be noted that the defences close to this site are designed and are relatively modern structures and the condition rating is considered good, so failure, even on a 20 metre wide section is considered highly unlikely.

As a result of the TE2100 project, defences will be improved around the area so maintenance, certainly for the anticipated lifetime of this facility is considered not to be a major issue particularly if, as a result of the TE2100 project, awareness and maintenance levels are improved above current good standards.

Mitigation

In terms of the mitigation measures which could be undertaken for this site there are a number of key areas which can be addressed.

Although the site is defended to a very good standard and is not considered to be at risk of flooding save for a potential breach failure close to the site a flood management plan for the site will be required.

Items to include within this are as follows:

- 1 – Signing up to the Environment Agency's free Flood Warnings Direct System via <https://fwd.environment-agency.gov.uk/app/olr/home>

This covers the area and aims to provide at least 2 hours warning before flood conditions exist. From this the most appropriate operational solution for users on the site can be selected. In the event of a catastrophic failure of the defences close to the site then there would likely be a serious issue with water ingress onto the site given the proximity of the defences. Where particularly high conditions are expected it may, in some circumstances, be more appropriate to temporarily close site operations down until the surge has passed, or phase operations accordingly to reduce the exposure of site staff to immediate danger.

- 2 – In the event of an Emergency or Breach then a contingency flood plan should be implemented in accordance with EA Guidance Note 3. Dependent upon potential breach locations, it may be that several hours are available for the safe egress of people off site in the event of a breach, dependent upon its location and the reality of the operations on the site is that the larger vehicles working on the site are more robust and able to be able to assist with moving users of the site to safety than either walking or using personal vehicles. Consideration could be given as to how best to use these to ensure that office staff are afforded safer egress in the event of an emergency. However, within the embayment the retention of the two storey office block is important because the most appropriate management system for many of the sites in the employment area is to ensure that personnel have access to a safe and defensible refuge on site.

Summary and Recommendations

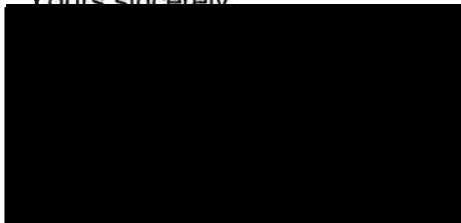
In summary the proposal involves the erection of two large prefabricated buildings to complement an existing operation behind well defended areas of the Thames, as well as operations which drain into a sealed tank system.

Although the site area is classed as flood zone 3 it is currently defended to a high standard with ongoing projects to further raise and maintain the existing defences proposed. Flooding is likely to be primarily as result of a breach scenario, and the depth of flood water in these scenarios, is likely to prove a potential danger for all.

Safe localised and defensible refuge is considered appropriate and the existing masonry construction two storey office appears to provide this going forward as part of an overall flood management plan for the site'

On that basis we consider that the proposed use of the site as a less vulnerable usage is wholly appropriate given the long term objectives to upgrade the area. Construction of the modular buildings on the site will also provide a commercially viable opportunity to enhance the site's existing surface water run-off characteristics by attenuating peak rainfall flows and provides the opportunity for some water re-use in accordance with general long-term surface water management aims, subject to a robust flood management plan for the site being agreed with the local emergency planning authorities.

Yours sincerely



J.R. [Redacted] MEng CEng MIStructE MICE
On behalf of CBL Consulting



Planning Statement

Former Conway Site, Mulberry Way, Belvedere, DA17 6AN

Prepared by



Integrated Skills

For

Westminster Waste Limited


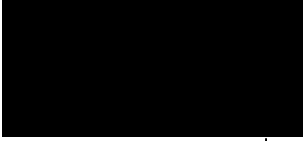
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WWL/MW/APP/01	Application Boundary
WWL/MW/LAY/01	Existing Layout
WWL/MW/LAY/02	Proposed Layout
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WWL/MW/LAY/04	Building B Layout
WWL/MW/ELE/01	Weighbridge and Transport Office
ST-18-PT-30559.idw	Elevation Building A
30559	Elevation Building B
ST-16-30559	Elevation Building C



1. INTRODUCTION

- 1.1 This document provides the planning statement to support a planning application submitted on behalf of Westminster Waste Limited (WWL), to change of use of the former Conway site to waste processing and recycling.
- 1.2 The application site is situated within Belvedere Industrial Estate, which is a designated Employment Area and is a Strategic Industrial Location.
- 1.3 The proposed development will involve the change of use to waste storage and recycling facility. The development will involve demolishing the existing buildings, the provision of new buildings and associated infrastructure including weighbridges and portacabin offices, plus boundary improvement.
- 1.4 The operation will be undertaken in accordance with the Environmental Permitting Regulations, as regulated by the Environment Agency to ensure that operations are undertaken in such a way that there are no significant risks of pollution of the environment, harm to human health or detriment to amenity.

The Applicant

- 1.5 The applicant is an established business, that was registered in 2010. The applicant provides waste management services to the construction industry, business and residents in London. They currently operate from Maybank Wharf in Charlton, but have been given notice to vacate the site due to redevelopment.
- 1.6 WWL operated from both Verney Road (London Borough of Southwark) and Ilderton Wharf (London Borough of Lewisham) prior to Maybank Wharf. Both of these sites are in areas that are being redeveloped. Verney Road remains operational but on a small scale. WWL were given notice at Ilderton Wharf, as this site was also being redeveloped.
- 1.7 Whilst WWL has always been aware that Maybank Wharf will be redeveloped, this phase of the development has been advanced at a faster rate than initially advised.
- 1.8 The site at Maybank Wharf already had planning permission for waste recycling. Planning permission was granted for two additional buildings to support the use. These two buildings are temporary in nature. They will be dismantled and re-assembled at Mulberry Way. It is proposed to also transfer all processing equipment to the new site.

Design and Access Statement

- 1.9 As the application is for a change of use, a Design and Access Statement is not required.



2. THE SITE

Location

- 2.1 The application area is centred on NGR TQ50397984, off Mulberry Way, as shown on Drawing No. WWL/MW/LOC/01. The application area is shown on Drawing No. WWL/MW/APP/01. The site is located within a Strategic Industrial Location.

Access / Exit

- 2.2 The access to the application site will be achieved using the southern entrance on to Mulberry Way. This joins Crabtree Manorway North, which in turn joins the A2016.

Description

- 2.3 The application site is approximately 2.2ha. The site includes approximately 4,141sqm of existing warehouse floorspace (including 517sqm of mezzanine floor). The existing warehouse buildings provide a mix of layouts. Various extensions in the past have created an assortment of dimensions and building heights. The maximum height is approximately 16m. The position of the main buildings is shown on Drawing No WWL-MW-LAY-01. The following dimensions are relevant:

Building Reference	Dimensions (sqm)	Height (m)
Unit 1	1,107	9m (apex)
Unit 2	732	16m (apex)
Unit 3	1,785	10m (apex)
Mezzanine	517	Not relevant
Office	427	2 Storey

- 2.4 There is approximately 8,000sqm of concrete yard, and 4,000sqm of hardstanding.
- 2.5 The site operated on a 24/7 hours 365 days/year basis. It has an O Licence for 155 HGVs.

Planning History

- 2.6 The site was previously occupied by FM Conway as their highway service depot. It has planning permission for uses within Class B1, B2 and B8. Previous to this, it was occupied by Henkel. The council has granted planning permission for the buildings and also for the retention of portacabins.



Proposed Use

- 2.7 It is proposed to change the use to allow waste processing and recycling. The development will involve demolishing the existing warehouse units and providing new buildings that will meet the requirements of the business. This is described in more detail in Chapter 4.

Surrounding Land Use

- 2.8 The application site lies within the Belvedere Industrial Location. The site is surrounded by other industrial buildings and uses. There are residential properties along the western boundary, which are accessed from Jennings Way.

End of Use

- 2.9 Should the waste use cease, the site will be returned to allow B1, B2 and B8 Uses to continue in line with the previous use.



3. ENVIRONMENTAL SETTING

Geology

- 3.1 The underlying bedrock geology is the Lambeth Group which comprises of sand, silt and clay. The superficial deposits comprise of Alluvium, which are fluvial in origin.

Hydrogeology

- 3.2 With reference to the Environment Agency website, the underlying bedrock geology is designated as a secondary A aquifer. The superficial geology is Secondary (Undifferentiated). There are no Groundwater Source Protection Zones within the vicinity of the site.

Hydrology

- 3.3 The nearest surface water body to the site is the River Thames, which lies approximately 370m east of the site. With reference to the Environment Agency's website, the site lies within an area with a low probability of flooding as it is within an area which benefits from flood defences.

Ecology

- 3.4 With reference to the MAGIC database, there are no ecological designations within the 1.2km of the site. The search included Special Areas of Conservation, Special Protection Areas, Sites of Special Scientific Interest and Ramsar sites.
- 3.5 Crossness Local Nature Reserve is 1km west of the site.

Cultural Heritage

- 3.6 There are no Scheduled Monuments within 1.5km of the site.

Green Belt

- 3.7 The site is not located within the Green Belt.

Public Rights-of-way

- 3.8 There are no Public Rights-of-way within the vicinity of the site.



4. PROPOSED DEVELOPMENT

- 4.1 The development will allow the applicant to relocate their existing business and provide business continuity. The applicant currently operates from Maybank Wharf in the Royal Borough of Greenwich. The facility receives waste collected by their construction and demolition (C&D) waste collection business. There are three buildings at Maybank Wharf. One building is used to receive the mixed C&D waste. The waste is sorted to separate a number of materials for recycling. A second building is used to treat waste wood. The third building is used as a workshop for maintaining its fleet of vehicles. The second and third buildings are temporary in nature and will be dismantled and re-assembled at the new site. A new building, again temporary in nature, will be provided as the main waste reception and processing building.
- 4.2 The positions of the new buildings are shown on Drawing No. WWL-MW-LAY-02. The following dimensions are relevant:

Building Reference	Dimensions (sqm)	Height (m)	Use
Building A	3,150	8m (eaves)	Receipt, storage and treatment of mixed C&D Waste
Building B	1,800	8m (eaves)	Receipt, storage and treatment of wood waste
Building C	200	5m (eaves)	Maintenance/workshop
Office	427	2 Storey	No change
Weighbridge Office (portacabin)	30	3	Office
Transport Office (portacabin)	30	3	Office

- 4.3 There will be no change to the office or staff car park. There are currently 43 car parking spaces.
- 4.4 There will be a weighbridge, weighbridge office and transport office near to the site entrance. The offices will be standard portacabin type structures, see Drawing No. WWL-MW-ELE-01.
- 4.5 WWL invested significantly in processing equipment and all the equipment will be transferred to the new development.
- 4.6 The Recycling Facility will accept and process waste that arises from the applicant's waste collection service and will generally include mixed construction and demolition wastes. Waste will be delivered and unloaded within the relevant reception area of Building A. There will be two reception areas, one for the heavy waste (mixed soils and hardcore) and one for light waste (mixed C&D waste including, plastic, wood, metal, cardboard). Waste within either bay will first be sorted by hand or mechanically to remove large items such as metal, plastic, concrete and wood.



- 4.7 The light waste will be loaded into the process equipment which includes a trommel screen to remove the fine particles, followed by a picking station from which the following items will be removed:
- Film plastic
 - Cardboard
 - Rigid Plastic
 - Grade C wood
 - Grade B Wood
 - Plasterboard
 - Residual (other wastes not including inert, metal or below 100mm in size)
- 4.8 These wastes will be deposited into separate storage bays.
- 4.9 Additional storage capacity will be provided by specific containers for plasterboard, inert and residual waste.
- 4.10 The hardcore will continue along the conveyor belt and be deposited within its own dedicated bay.
- 4.11 The heavy line will be passed through a trommel screen to separate the soil from the hardcore.
- 4.12 The site will manage up to 150,000 tonnes of waste per annum.
- 4.13 Figure 1 shows the existing picking station at Maybank Wharf.

Figure 1 – Existing Picking Station at Maybank Wharf



- 4.14 The indicative process layout is shown on Drawing No WWL-MR-LAY-03.
- 4.15 The site achieves 100% diversion from landfill disposal.



- 4.16 Approximately 60% of the wood to be processed on the site will be segregated from operations within Building A. The remaining 40% will be direct delivered source segregated wood.
- 4.17 With Building A, the wood will be sorted into grades B or C. The separated wood will be transferred to the wood processing area in Building B using a loading shovel. The wood processing building will have two separate bays for Grade B and C wood.
- 4.18 The Grade B wood will be transferred to the high speed shredder and then fed through a mobile screener. This will produce 0-80mm wood chip for panel board manufacturing. The oversize (>80mm) will be fed through the shredder again.
- 4.19 The Grade C wood will be transferred to the high speed shredder which will produce 0-100mm chip which will be transferred off site as a biomass fuel.
- 4.20 The existing wood processing facility at Maybank Wharf is shown on Figure 2.

Figure 2 – Inside Existing Wood Processing Building at Maybank Wharf (the building and plant will be relocated)





Access

- 4.21 The third building, labelled C on the plan, will be used for maintenance /workshop. The building will be dismantled from Maybank Wharf and re-assembled at Mulberry Way. Figure 3 shows the existing building at Maybank Wharf.

Figure 3 – Existing Maintenance/Workshop to be relocated from Maybank Wharf



Access

- 4.22 The existing site has two accesses on to Mulberry Way. It is proposed to only use one access. This will be from the southern boundary and will ensure that all vehicles delivering waste will use the weighbridge and report to the site office. The second gate on the eastern boundary will be kept locked at all times.



Site Offices

- 4.23 The existing site office and staff facilities will be utilised for the administration and accounts staff. A weighbridge office and transport office will be provided near the site entrance.

Drainage

- 4.24 The existing drainage comprises of surface water runoff to sewer via an interceptor. It is proposed to convert the existing open water tank to a sealed tank. This will store water from the waste buildings and is compliant with Environment Agency regulation. The remaining water will continue to discharge via the interceptor.
- 4.25 The entire site is already concreted, except for a small area in the northern part. This will be concreted for the benefit of provided Building B. Any rain water that used to infiltrate the ground in this location, will be captured by the building and used for dust suppression.
- 4.26 Water storage tanks will be provided for each building to capture roof water.

Parking

- 4.27 The existing staff car park as 43 spaces. No changes are proposed, other than to provide electric car charging points.
- 4.28 FM Conway has an Operating Licence for 155 HGVs at this site. WWL has an Operating Licence for 40 HGVs at Maybank Wharf. There is a significant reduction in the number of HGVs and there will be sufficient space to park all vehicle within the operational yard at the end of each working day.

Staffing and Employment

- 4.29 Since February 2011 the company has grown, employing 34 people in 2016, and now employs 40 staff. Staff include manual labourers, administration, accounts, plant operatives and mechanics. The Site Management are required to maintain their Certificate of Technical Competence. The applicant will support this continued training. It is envisaged that the number of staff could increase as the business continues to develop.

Hours of Operation

- 4.30 FM Conway operated 24/7 hours, 365 days a year from the site. The site is located within a Strategic Industrial Location and any other occupant could continue with a similar business without any restrictions.
- 4.31 The nature of the proposed operation will broadly work within the following hours, although access may be required outside of these hours.

Monday to Friday	06.00 – 18.00
Saturday	06.00 – 16.00
Sunday/Public Holiday	No Operations

Site Security

- 4.32 The entire site benefits from steel palisade fencing.
- 4.33 All gates, other than the main entrance, will be kept locked at all times. The front gate will be locked when the site is not manned.
- 4.34 The site will be secured with CCTV.



4.35 All buildings have roller shutter doors, which will be locked when the site is not operational.

Construction

4.36 The construction works will take place during the same operational hours. A Site Construction Plan will be provided prior to demolishing works commencing.

4.37 A new fence will be installed along the northern boundary with properties on Jenningsree Way before works commence.

4.38 The new buildings can be installed over a short period. No foundations or piling works are required for the new buildings. The only site preparation works will be the requirement to concrete the land in the northern part of the site and install the sealed drainage works required by the Environmental Permit.



5. POLICY

National Planning Policy

- 5.1 National Planning Policy is provided in the National Planning Policy Framework¹ (NPPF). Although this does not have specific waste policies, it is a material planning consideration. Sustainable Development is at the heart of the NPPF and there is a presumption in favour of sustainable development.
- 5.2 In delivering sustainable development there are three overarching objectives to consider; economic, social and environmental. All three contribute to the provision of sustainable development.
- 5.3 The NPPF states that the economic role contributes “*to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*”.
- 5.4 It is considered that the former Conway site is the right type, at the right location and will meet the applicant’s current business needs and so is at the right time. It is very difficult to find a site which can accommodate all of the business needs. WWL originally started operations from Verney Road. The site at Ilderton Wharf supported this but focussed on waste wood and plasterboard. However, this required HGVs to move material from one site to the other on the road network.
- 5.5 The site at Maybank Wharf suited all the business needs. There is sufficient space to operate the two main process lines. One building is used for mixed C&D waste and the second building processes waste wood. There is also space for storing empty containers and a maintenance/workshop. Overall, this arrangement minimises HGV movements. A vehicle that delivers waste to the site, can collect new or exchange containers for their next job.
- 5.6 The site at Mulberry Way will allow the applicant to relocate the entire business, rather than spread the various uses over different sites. This is considered to be economically viable as it confines the office costs to one site. It also reduces HGV movements which is meets both the economic and environmental objectives.
- 5.7 The economic gains from this proposal can be summarised as:
- Long term job security for current staff.
 - Beneficial use of the premises which is currently vacant.
 - Continued business service in recovering 100% of the waste and diverting waste from landfill disposal.
 - Maximise the revenue from selling materials for recycling.
 - Business continuity (WWL is established and requires a new location)
- 5.8 Paragraph 80 requires planning policies and decisions to “*help create the conditions in which businesses can invest, expand and adapt. 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.*”

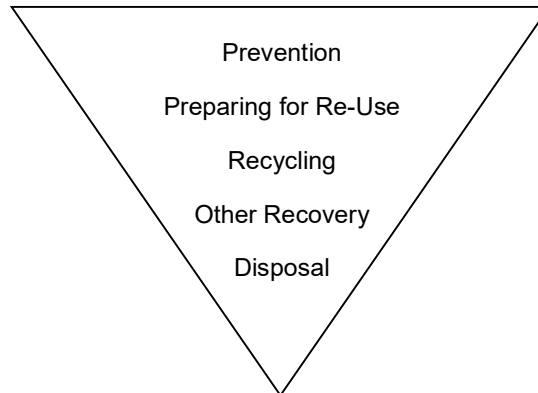
¹ National Planning Policy Framework, Ministry of Housing, Communities and Local Government, July 2018



- 5.9 WWL is an existing business that needs to find alternative premises to continue their operation. There is a significant programme of redevelopment in all London Boroughs, which is reducing the amount of industrial land available to businesses. By securing this site, will ensure that the business can continue to offer a service to its existing customers and it will continue to manage waste generated within London in London.
- 5.10 The NPPF states that the social role is to support strong, vibrant and healthy communities by creating a high quality built environment with accessible local services, that reflect the community's needs and support its health, social and cultural well being.
- 5.11 It has been established that the application site meets all the locational criteria and is considered to be the right location for the development. This will provide up to 10 new jobs, including supervisor roles, as well as secure the existing jobs. The application site is currently vacant. WWL operate to high standards ensuring all staff receive training and are equipped to carry out their roles.
- 5.12 WWL also support a number of community projects including:
- WWL provided 17 skips to support a DIY SOS project
 - WWL sponsor Bromley Football Club
 - WWL support Make A Wish Foundation
- 5.13 The NPPF states that the environmental role will contribute to *“protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.”*
- 5.14 There are no environmental constraints associated with the application site and the proposed operation can be undertaken without causing environmental harm or impact local amenity, as set out in Chapter 6.
- 5.15 A significant environmental gain however can be achieved by continuing with the business aim of recovering 100% of the waste collected and therefore achieving zero waste to landfill.
- 5.16 The existing buildings on site evolved to suit the business of FM Conway. The internal layout and arrangement makes it difficult to be used without significant reconfiguration. WWL did consider the possibility of using these buildings. Waste facilities require a large, clear span internal space in which to accommodate the processing equipment. This could not be achieved with the current configuration.
- 5.17 The existing buildings will be demolished and the materials will be recycled. The provision of the temporary styled buildings allows the operator to maintain flexibility. As in this case, the applicant is able to dismantle and re-locate the existing temporary buildings at Maybank Wharf. This is considered to be sustainable as it minimises the use of natural resources in providing new buildings.
- 5.18 National planning policy on waste management is provided in the National Planning Policy for Waste (NPPW). This sets out the role of positive planning to deliver sustainable waste management and recognises the need for significant investment in waste management facilities to move the management of waste up the waste hierarchy while giving an increased emphasis to waste as a resource.
- 5.19 The waste hierarchy remains a pivotal mechanism in determining the type of facilities required to manage waste in a sustainable manner, maximising the recovery of waste and reducing its disposal. The UK has a legal duty under the EU Waste Framework Directive, as enshrined in law through the Waste (England and Wales) Regulations 2011, to implement the waste hierarchy. The waste hierarchy is provided in Figure 4.



Figure 4 - Waste Hierarchy



- 5.20 The use of the application site will provide a facility to enable the operator to continue with its existing business which seeks to separate materials for recycling and ensure this waste is diverted from landfill disposal. The proposed operation therefore meets the objectives of the NPPW in moving waste management up the hierarchy. This is fully consistent with the UK's legal requirements to manage waste sustainably.
- 5.21 The NPPW states that in searching for sites and areas suitable for new or enhanced waste management facilities, waste planning authorities should consider *"give priority to the re-use of previously developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages"*. The NPPW also supports the use of industrial sites. The application site is within a Strategic industrial Location, which is a Primary Employment Area and is considered to be suitable.

The London Plan

- 5.22 The Spatial Development Strategy for Greater London is provided in the London Plan².
- 5.23 Policy 5.16 promotes self-sufficiency by:
- Managing as much of London's waste within London.
 - Creating positive environmental and economic impacts from waste processing.
 - Working towards zero biodegradable or recyclable waste to landfill by 2026.
- 5.24 This will be achieved by:
- Minimising waste.
 - Encouraging the reuse and reduction of materials.
 - Exceeding recycling/composting levels in MSW and C&I wastes.
 - Exceeding recycling and reuse levels in construction and demolition waste of 95% by 2020.
 - Improving London's net self-sufficiency.

² The London Plan, Spatial Development Strategy for London Consolidated with Alterations Since 2011, March 2016



- Coordinate strategic waste management across the South East of England.
- 5.25 The proposed development is fully consistent with this policy as it will manage waste generated within London in London; it will create economic opportunities as discussed previously; it will divert waste from landfill and contribute to exceeding recycling and reuse levels of construction and demolition waste. This is for an existing waste management company seeking to relocate their business.
- 5.26 The London Borough of Bexley is part of the South Eastern London Joint Waste Planning Group. This also includes the London Boroughs of Bromley, Lewisham, Greenwich and Southwark. WWL has operated from sites within Greenwich, Lewisham and Southwark, thus confirming the established nature of their business being with this part of London.
- 5.27 Policy 5.17 relates to waste capacity, planning decisions and apportionment requirements for the Local Development Framework. However, the apportionment requirements relate only to MSW and C&I wastes and are therefore not applicable to this application.
- 5.28 Policy 5.17 sets out that proposals for waste management should be evaluated against the following criteria. This was also identified in the pre-application advice (policy 5.17 B a-k):
- Locational suitability
 - Proximity to source of waste
 - The nature and scale of the activity
 - Minimising waste and achieving high reuse and recycling performance
 - A positive carbon outcome of waste treatment methods (including transportation)
 - The environmental impact (noise, odour, visual impact and impact on water resources)
 - The transport and environmental impact of all collection, transfer and disposal movements
- 5.29 The site is located within an existing industrial estate which is also a Primary Employment Area. The applicant has an established customer base and the site is close to the source of the waste. The applicant has previously worked from premises within Greenwich, Lewisham and Southwark, thus confirming the established nature of their business being with this part of London. It will provide a local contribution to waste management, serving the local business need which will not have any impact in terms of noise or odour. There will be no visual impact or any impact on water resources.
- 5.30 The company operate a fleet of vehicles that are compatible with the London emission zones. The proposed development will include the provision of electric car charging spaces, with space for future growth.
- 5.31 There will be little impact on the local highway network. The company is already operating in London with an established fleet of HGVs and customers.
- 5.32 The proposed development is therefore consistent with policy 5.17 of the London Plan.
- 5.33 Policy 5.18 relates to construction, excavation and demolition wastes. It states new construction, excavation and demolition (CE&D) waste management facilities should be encouraged at existing waste sites, including safeguarded wharves and supported by:
- a) Using mineral extraction sites for CE&D recycling.
 - b) Ensuring that major development sites are required to recycle CE&D waste on site, wherever practicable, supported through planning conditions.



- 5.34 The applicant's existing customers include building contractors and construction firms. The waste collected is predominantly from refurbishment and redevelopment projects for housing and commercial premises. Many development sites in London do not have the land available for segregating waste on site. WWL will collect the waste and sort it at the new site. In addition, WWL offer a Wait and Load Service. This is aimed at development sites which are in busy locations or with restricted access locations where containers cannot be left.
- 5.35 The London Plan has set a target of recycling 95% of CE&D waste by 2020. The company is already providing a contribution towards this target. By relocating to the application site, will enable the continued drive towards zero waste to landfill and recovering 100% of the waste collected.

Local Planning Policy

- 5.36 The Core Strategy³ is the main document and was adopted in February 2012.
- 5.37 Policy CS20 sets out the sustainable waste management criteria:

In support of the objectives of sustainable waste management and its contribution to sustainable communities, the Council will ensure that land resources are available to implement European and government policy and directives on waste by:

- a. meeting its waste apportionments and other requirements, such as the Mayor's recycling or composting targets, including collaboration with the other London boroughs as appropriate;*
- b. supporting regionally significant waste management infrastructure, including the Crossness Sewage Treatment Works;*
- c. identifying and safeguarding future sites suitable for waste management uses; and*
- d. setting out criteria for development of new waste management facilities.*

In new development, the Council will ensure that waste is managed in ways that protect human health and the environment and will follow the principles of the waste hierarchy as set out in the Waste Management Strategy for Bexley. Where opportunities arise, this principle will also be applied to existing development. Targets have been set, in line with national and regional guidance, and local circumstances, and these will be reviewed as appropriate.

- 5.38 The first part is not relevant to this application in that it relates to apportioned waste. Part b is also not relevant as it relates to supporting regionally significant waste management infrastructure. This proposal is for a local facility to meet a local business need.
- 5.39 Part c safeguards sites that are used to manage Municipal Solid Waste (MSW) and Commercial/Industrial (C&I) waste generated within the Borough as well as apportioned MSW and C&I waste from other Boroughs.
- 5.40 Part d relates to the council's commitment to manage waste in ways that protect human health and the environment. These have been addressed in Chapter 6.

³ Local Development Framework, Bexley Core Strategy, Adopted 22 February 2012



6. ENVIRONMENTAL IMPACTS AND CONTROLS

6.1 This section deals with locational criteria set out in the NPPW. It also addresses Part d of CS20 of the Core Strategy, as well as other specific Core Strategy policies.

Protection of Water Quality and Resources and Flood Risk Management

- 6.2 Policy CS08 of the Core Strategy deals with climate change and flood risk management.
- 6.3 The site is located within an area that benefits from flood defences. The defences protect the area against a river flood with a 1% chance of happening each year, or a flood from the sea with a 0.5% chance of happening each year.
- 6.4 A Flood Risk Assessment has been prepared.

Land Instability

6.5 This is considered to be irrelevant.

Landscape and Visual Impacts

6.6 The site is not located in a sensitive landscape setting. The existing development includes a mixture of buildings with varying heights, as indicated on Figure 5.

Figure 5 – Existing Buildings





- 6.7 The maximum height is 16m. The proposed development will demolish the existing buildings (Units 1 – 3) and provide three new buildings as follows:

Building Reference	Dimensions (sqm)	Height (m)	Use
Building A	3,150	8m (eaves) 13m to the ridge.	Receipt, storage and treatment of mixed C&D Waste
Building B	1,800	8m (eaves) 12m to the ridge	Receipt, storage and treatment of wood waste
Building C	200	5m (eaves) 7m to the ridge	Maintenance/workshop
Office	427	2 Storey	No change
Weighbridge Office (portacabin)	30	3	Office
Transport Office (portacabin)	30	3	Office

- 6.8 The buildings, whilst they can be installed over a short period, they are durable and allow the user to maintain flexibility. Each building will appear as a standard industrial unit. All buildings will be lower than the existing highest building.

- 6.9 Figure 6 shows the proposed image of Building A.

Figure 6 – Schematic of Building A



Nature Conservation

- 6.10 Core Strategy policy CS18 relates to biodiversity and geology.
- 6.11 With reference to the MAGIC database, there are no ecological designations within the 1km of the site. The search included Special Areas of Conservation, Sites of Special Scientific



Interest, Special Protection Areas and Ramsar sites. There are no nearby Local Nature Reserves or Sites of Borough or Local Importance for Nature Conservation.

- 6.12 The site is located within an established industrial estate. The site has little ecological value, with little opportunity to promote ecological enhancement.

Conserving the Historic Environment

- 6.13 Policy CS19 relates to Heritage and Archaeology. The site is located within an established industrial estate. There are no Scheduled Monuments within 1km of the site. There is a Listed Building approximately 480m north west of the site.
- 6.14 The proposed development will have no impact on the local heritage.

Traffic and Access

- 6.15 Policy CS15 relates to integrated and sustainable transport. Policy CS16 relates to the need to reduce travel and the impact of travel.
- 6.16 Of relevance is the need to encourage sustainable modes of transport. The existing car park has space for 43 cars. An allowance for electric cars will be made with this application.
- 6.17 The site has a Public Transport Access Level score of 1b but is close to cells with a score of 2 or 3.
- 6.18 There are a number of bus routes in the locality. The nearest being route 180 which stops on Mulberry Way. This is the service between Molesworth Street and Crabtree Manorway North. It passes through Woolwich and Greenwich.
- 6.19 Route 401 stops on Anderson Way, which is approximately 3 minute walk to the site. This route connects Bexley Heath with Thamesmead.
- 6.20 Belvedere Train Station is 1 mile from the site, which is within cycling and walking distance from the site.
- 6.21 For all modes of public transport the site is served with footways, which makes the site useable to these options.
- 6.22 The current parking provides 43 spaces. This is considered to be sufficient for the proposed use. However, the applicant will set aside provision for two electric spaces, with the ability to provide more if required.
- 6.23 Secure bicycle storage will be provided in the site offices, together with lockers.
- 6.24 The applicant has an Operating Licence at Maybank Wharf for 40HGVs. The majority of which are skip vehicles and rollonoffs. It is proposed to operate a one-way system through the site. Vehicle tracking has been carried to demonstrate that all vehicles can enter and manoeuvre within the site and leave in forward gear.
- 6.25 FM Conway had an Operating Licence for 155 HGVs from this site. Assuming each vehicle left the site at the start of each day, and returned at the end, that would have generated 310 HGV movements. The car park has spaces for 43 cars, which could have generated at least 86 movements.
- 6.26 Based on the proposed operation involving 40 HGVs, the following vehicle movements are anticipated:

Each Skip/Rollonoff Vehicle makes 2 deliveries per day 80 Loads in 80 trips out



Artic Loads to remove waste	2 loads per day	2 loads out	2 trips in
Total HGV movements per day		164	
Total car movements per day		60	

- 6.27 The proposed level of use is significantly less than the previous occupant. In addition, that occupant had 24/7 hours, 365 days/year access. The proposed use will be restricted to operational hours.
- 6.28 In terms of alternative forms of transport, the nature of the waste being collected means that transport by rail or water is difficult. Construction sites are located all over London without ease of access to these other transport modes. The collection of waste in the vehicles currently used is considered to be the most efficient for this type of waste.
- 6.29 WWL has achieved FORS⁴ Gold and CLOCS⁵ Champions accreditations.

Air Emissions, including dust

- 6.30 Air quality can be affected by visible dust particles and smaller dust particles that may be respirable (PM10). Bioaerosols are smaller particles and are generally associated with green waste/food waste composting operations and are therefore not relevant to this application.
- 6.31 All waste operations will be carried out within a building which will help to control dust emissions.
- 6.32 In terms of location, the site is considered to be suitable for the proposed use and there will be no significant air quality impact. However, the following dust mitigation and management measures will be implemented to ensure the site is operated in accordance with the Environmental Permit: -
- Install dust suppression points within the buildings.
 - Dust suppression to be fitted on access points to buildings.
 - Maintenance of plant and equipment.
 - All vehicles to be sheeted until ready to discharge load into the building.
 - All vehicles removing material from the site are to be sheeted before entering the Public Highway.
 - Cleaning vehicle wheels to preventing tracking.
 - Speed restrictions in yard area.
 - Use of a banksman to prevent vehicles tracking out debris.
 - Effective preventative and on-going maintenance of all plant and dust suppression system.
 - Daily inspections by site manager.
 - Maintaining the Site Diary with accurate records of any changes in the operations that may give rise to short term dust emissions.
 - Daily recording of weather conditions.

⁴ Fleet Operator Recognition Schemes

⁵ Construction Logistics and Community Safety



- 6.33 It is considered that the implementation of these measures will minimise the potential for off-site emissions. In the event that there is a complaint relating to dust emissions, the applicant will undertake an investigation and implement corrective action as necessary.

Mud on the Road

- 6.34 Mud is generally tracked on to main roads on vehicle wheels. For this proposal, vehicles will have the wheels checked before exiting and will be cleaned using a hose and brush as necessary. The Site Manager will undertake regular inspections of the highway for signs of mud and debris. In the event that mud is found on the highway that has originated from this site, arrangements will be made to clean the highway. If necessary, a road sweeper will be used. All staff will be trained to be vigilant and report any incidences of mud and debris. The site will be regularly cleaned following daily inspections.
- 6.35 The entire site is concrete which allows easier maintenance and reduces incidents of dust generation.
- 6.36 Vehicles will be directed by a banksman which will reduce incidents of tracking mud/debris from the reception area.

Odours

- 6.37 The nature of the waste to be accepted at the site is unlikely to generate odour. The waste will predominantly contain mixed waste such as wood, cardboard, plastic and metal.
- 6.38 In terms of location, the site is considered to be suitable for the proposed use and there will be no significant odour impact. All waste will be received and treated in a building. The following odour management measures will be implemented to ensure the site is operated to a high standard and in accordance with the Environmental Permit: -
- Regular cleaning of the waste reception area.
 - Any odorous materials will be transferred directly into the residual waste container and covered with non-odorous waste.
 - All vehicles removing material from the site are to be sheeted before entering the Public Highway.
 - Daily inspections by site manager.
 - Maintaining the Site Diary with accurate records of any changes in the operations that may give rise to short term odour emissions.
 - Daily recording of weather conditions.
- 6.39 With these measures in place, it is considered that odour will not cause an impact in the locality. If complaints are received relating to odour, the applicant will investigate the source and respond accordingly.

Vermin and Birds

- 6.40 The site will not accept waste that typically attract pests, for example food waste. Any wastes that are considered likely to attract pests will be deposited within the residual waste storage container for onward transfer to a disposal site. The will be cleared of such waste within 48 hours. All waste will be received and treated within a building.
- 6.41 The daily site inspection will include visual monitoring for evidence of pests. If necessary, the operator will commission a pest control specialist to visit the site and inspect for signs of pest infestations. Appropriate control will be implemented and observations recorded in the site diary.



Noise, Light and Vibration

- 6.42 The proposed operation will involve the installation of process equipment to sort the waste. Building A will be used to treat the mixed waste. Building B will be used to treat waste wood.
- 6.43 The nearest residential receptors are located on Jenningtree Way. It is proposed to install a 2.4m high fence along this boundary. The current fence is steel palisade which does not offer any noise protection. It is proposed to provide fence constructed from railway sleepers.
- 6.44 The operation of this machinery is fully consistent with the industrial location.
- 6.45 To ensure noise is kept to a minimum and as part of good management practices, the following noise mitigation measures will be implemented on the site:
- Speed limits will be imposed for all vehicles using the site;
 - All waste will be received, stored and treated inside a building;
 - Operating plant in a noise sensitive manner (avoiding unnecessary throttling back and acceleration);
 - Operations of plant and machinery only during the permitted operational hours;
 - All plant and machinery will be maintained in accordance with the manufacture's recommendations;
 - Plant and machinery will be switched off when not in use; and
 - Maintain a site diary with accurate records of any changes in the operations.
- 6.46 The lighting requirements will be the same as the previous use of the site. It is only proposed to use external lighting during the operational hours in darkness.
- 6.47 The proposed development will not use plant that could lead to vibration.

Litter

- 6.48 There is a potential risk associated with litter. Lightweight wastes may be delivered to the site mixed with the general wastes. All vehicles delivering and removing waste will be sheeted. All waste will be received, stored and treated within a building.
- 6.49 The Site Manager will make daily inspections to ensure the cleanliness of the site is maintained to prevent waste escaping beyond the site boundary and to implement manual litter collecting duties as necessary.

Potential Land Use Conflict

- 6.50 There are no known potential land use conflicts.



7. CONCLUSION

- 7.1 This Planning Statement has been prepared to support an application to change the use of the land at the Former Conway site at Mulberry Way.
- 7.2
- 7.3 The application has demonstrated the need for the facility and confirmed that operations can be undertaken without impacting neighbouring property.
- 7.4 The application site is located within a Strategic Industrial Location and Employment Area. It is entirely in accordance with relevant planning policies.
- 7.5 The use meets national targets for diverting waste from landfill, increasing the amount of waste recovered for re-use and recycling and meeting the wider objectives of sustainable waste management by managing waste within the Borough, close to the source of the arisings.
- 7.6 The development supports an existing business that is operating in the south eastern part of the London. It will ensure the security of the existing 34 staff, as well as support the growth of the company.
- 7.7 The proposal is compliant with national and local planning policy.



DRAWINGS

WWL/VER/LOC/01	Location Plan
WWL/VER /APP/01	Application Plan
WWL/VER /LAY/01	Site Layout Plan