

**Addendum Report****Planning Committee 4 September 2019****Item: 5****DM2018/01865 - 79-85 Beddington Lane, Beddington, CR0 4TH**

To report to committee that:

An email was received on the 23rd August 2019 from Councillor Green, questioning the timing of the application to Planning Committee, picking up on the points that the proposed Traffic Management Order for the weight restriction on Hilliers Lane / Beddington Lane junction with Croydon Road (A232) has not yet been enforced, the lack of speed enforcement cameras and potential road calming measures along the southern part of Beddington Lane and Hilliers Lane.

In terms of the timing of the application Officers have been working with the applicant to deal with technical issues in respect to the drainage of the site, which have only been resolved on the 1 August 2019. As such in accordance with national policy Officers have brought the application before Planning Committee with a resolution to grant planning permission to ensure what is considered to be an acceptable development is not unreasonably delayed. In terms of the Traffic Management Order, speed enforcement cameras and road calming measures these issues are still being considered by the Council's Highways department.

Further correspondence has been received from Croydon Council following the publishing of the report to Planning Committee. The letter and email received on the 2 September 2019 outlines concerns regarding the wording of condition 9 of the report. The modelling in respect to the traffic distribution allowed for HGVs to exit Beddington Land to the north on to the Croydon Road (A236) or Windmill Road (B272). As such they have requested the wording 'shall be along Coomber Way and Ampere Way' be removed. Croydon Council has also requested to be consulted in respect to the approval of the condition relating to service and delivery.

As such condition 9 of the draft decision notice shall be amended to read:

*9) Prior to the occupation of the development hereby approved, a full Delivery and Servicing Plan (DSP) shall be submitted to, and approved in writing by, the Local Planning Authority. The Delivery and Servicing Plan shall include details of the HGV haulage routing to and from the site and shall also include details of how future customers of the site shall be informed of this HGV haulage route. The approved details shall be implemented and permanently retained thereafter.*

*Reason: In the interest of road safety and to safeguard the amenity of nearby residential properties in accordance with Policy 29 of the Sutton Local Plan 2018.*

In response to the above the applicant has commented on the representation from Croydon and clarified some points in respect to the distribution of traffic which are summarised below.

These are that there is no reason to suspect that the modelling has underestimated the impact of the weight limit to Beddington Village, re-emphasising the removal of the objection from Transport for London (TfL).

That the weekend operation of the site would be minimal with a total number of expected trips to and from the site being approximately 47, of which 9 to 10 would be HGV trips to and from the site. Below is a table of the predicted trips based on the site being open between 06:00 - 13:00 hours)

Development Elements	MATERIAL INPUT						
	Proposed Tonnage	Percentage Mon-Fri	Tonnage on Weekends	Operating Days	Average Saturday Tonnage	Average Payloads	Daily Trips (One-Way)
Bailing	25,000	94.9%	1280	50	26	5.37	5
Mono / Sorting	45,000	100.0%	3	50	0	1.22	0
RDF Facility	240,000	94.9%	12276	50	246	10.29	24
Wood	40,000	93.3%	2687	50	54	5.35	10
<b>Total</b>	<b>350,000</b>		<b>16,246</b>		<b>325</b>		<b>39</b>

  

Development Elements	MATERIAL EXPORT						
	Proposed Tonnage	Percentage Mon-Fri	Tonnage on Weekends	Operating Days	Average Saturday Tonnage	Average Payloads	Daily Trips
Bailing	25,000	99.5%	117	50	2	23.90	0
Mono / Sorting	45,000	95.0%	2247	50	45	17.47	3
RDF Facility	240,000	98.2%	4423	50	88	23.67	4
Wood	40,000	96.3%	1480	50	30	21.31	1
<b>Total</b>	<b>350,000</b>		<b>8,266</b>		<b>165</b>		<b>8</b>

In terms of reassignment of the trips the modelling predicts that:

*HGV's currently accessing from Hilliers Lane from A232:*

- 50% of this existing HGV traffic would in future utilise A236 Croydon Road or B272 Windmill Road;
- 10 % would utilise A236 Croydon Road to link to the Lombard Roundabout;
- 40% would join the A23 corridor via either BEddington Farm Road or Ampere Way.

*HGV's currently exiting Hilliers Lane to A232:*

- 55% of this existing HGV traffic, would in future travel, via Ampere Way to connect to A23 Purley Way, with 30% link to the A23 to the south and 25% via Croydon Road;
- 5% would utilise Ampere Way to link to the A23 towards Lombard Roundabout;
- 40% would access via the northern approach corridors of A236 Croydon Road or B272 Windmill Road.

As has been mentioned earlier the draft Service and Deliver Plan which identifies the proposed routing of the HGV traffic allows for traffic to enter and exit Beddington from the north vian the Croydon Road (A236) or Windmill Road (B272) or along the Coomber Way/Ampere Way corridor to the A23 Purley Way.

The following amendments are made to the committee report. Changes are highlighted in **bold**.

Amend paragraph 2.10 to read:

North of the administrative building, the application proposes in total 50 car parking spaces for staff and visitors, comprising of 3 accessible car parking spaces and **11** electric car charging point spaces. This car park would be accessed from Beddington Lane and there would be no vehicular access to the wider site from the car park.

Amend paragraph 2.11 to read:

Soft landscaping is proposed to the west, south and east boundaries of the site, with the mature trees to the northwest corner shown to be retained. This would also include a green roof and wall to the shelter for the RCV fleet located on the **western** boundary of the site.

Amend the following entries to the table in paragraph 3.10:

<b>Secure by Design Officer</b>	No objection subject to a scheme to provide CCTV to prevent unauthorised access to Mile Road and fly tipping. (see condition <b>36</b> of the attached draft decision notice.)
<b>London Fire Brigade</b>	No objection subject to the provision of an additional fire hydrant. (see condition <b>26</b> of the attached draft decision notice)

Amend paragraph 3.13 to read:

The objections received from Councillor Matthey are outlined in the table below with the officers response to each of the comments raised:

Objection Received	Officer Comments
<b>Land Use</b>	
The application has not assessed the carbon outcome from the development.	The main purpose of the end to end Carbon Outcome assessment is to ensure energy from waste facilities demonstrate they are extracting as much energy as possible from waste. In terms of the proposed development it is only necessary to demonstrate that the proposal is implementing the waste hierarchy, with only material which cannot be recycled used to make RDF. This has been assessed by the GLA who have raised no objection to the proposal on this matter.
The proposal would result in development on MOL.	The portion of the site designated as MOL is Mile Road and is considered to be previously developed land and so is an exception in terms of inappropriate development. Furthermore, there is

	<p>also an extant permission on the site which could be implemented resulting in the use of Mile Road and it is considered that the redevelopment of the site in this instance would be acceptable.</p>
<p>Lack of evidence for the locational suitability of the proposal.</p>	<p>The London Plan, The South London Waste Plan and The Local Plan expect waste management sites to be located within Strategic Industrial Locations such as Beddington Lane and safeguarded waste sites such as the application site should be brought forward. The applicant expects that the waste which will be processed would come from the South London Waste Partnership areas and the wider south-east region. Furthermore, it should be noted that the development has an extant permission which established that a waste management use is acceptable in principle in land use terms at this site.</p>
<p>The proposal would adversely impact on the openness of Beddington Farmlands.</p>	<p>The proposal would be viewed in the context of Beddington Lane SIL and the main operations building would be set in from the western boundary of the site. The provision of green walls and roofs to the RCV enclosure would mitigate the impact of the development on Beddington Farmlands.</p>
<p>The proposal would reduce the attractiveness of the local area to business due to increased traffic congestion, pollution and risk of odour.</p>	<p>The proposal has been assessed by both TfL, and the Senior Highways Engineer, who have raised no objection to the trip generation impact on the public highway. The odour control methods have been assessed by Environmental Health who have raised no objection and as such the proposal is considered not to prejudice the Beddington Lane Strategic Industrial Location. (See condition 33 of the draft decision notice)</p>
<p>The applicant should demonstrate the quantitative or market need for the proposed waste facilities.</p>	<p>The Local Planning Authority's Development Plan is up to date and the proposal is consistent with the Local Plan and South London Waste Plan</p>

	policies in respect to waste management facilities.
<b>Design and Layout</b>	
Lack of fully enclosed site operations.	The <b>main</b> operations of the site will be undertaken within the main building with wood and recyclable waste which have been baled stored under a canopy, which is not completely enclosed to allow for vehicle manoeuvring to collect the bales. The Environment Agency and GLA have considered this design to be acceptable.
Lack of wheel washing facilities.	A condition requiring the submission of a construction method statement includes details to be submitted in respect to dust control measures and wheel washing during construction and is recommended. In addition a condition is recommended to secure details to prevent fugitive litters from the site. (See condition <b>37</b> of the attached draft decision notice.)
<b>Landscaping and Biodiversity</b>	
The proposal lacks information on protected species.	The Biodiversity Officer has assessed the ecology appraisal submitted with the application and the further information submitted in respect to birds and is satisfied that the proposal would not result in harm to protected species.
The proposal would result in the loss of SINC.	Whilst the proposal would result in the loss of land designated as SINC this land has already been previously developed and its value in terms of biodiversity is limited. The proposal would provide a net gain in biodiversity.
<b>Neighbour Amenity</b>	
The proposed inspections for pests and vermin are not sufficient to prevent an increase in vermin.	The applicant proposes that the facility would operate under the Integrated Management Systems (IMS). The IMS combines quality, environment and health and safety operations into a single consolidated system. The IMS

	<p>is accreditation system of the International Organisation of Standardisation. Daily site inspections form part of the accreditation and litter that would attract vermin would be collected and disposed of. However a condition requiring the further submission of details relating to pest control and vermin is recommended. (See condition <b>34</b> of the attached draft decision notice.)</p>
<p>The proposal would adversely impact on residential amenity.</p>	<p>The submitted ES has demonstrated in terms of noise and air quality that the proposal would not adversely impact on the neighbouring residential occupiers. This has been assessed by Environmental Health who have raised no objection to the proposal. In terms of outlook, loss of sunlight/daylight, privacy and light spill, given the distance of separation to the nearest residential occupiers there would be no adverse impacts.</p>
<p><b>Highways and Car Parking</b></p>	
<p>Lack of Public Transport Improvements</p>	<p>It is not considered that the development would result in significant traffic or trips to and from the site to warrant seeking public transport improvements along Beddington Lane. It should be noted that this has been supported by the Council's Highways and Transport team and TfL.</p>
<p>The proposal does not ensure that traffic will avoid sensitive receptors.</p>	<p>The proposed routing of the HGV traffic will <b>avoid Beddington Village</b>. This routing will be secured by condition within the service and delivery plan. The enforcement of any traffic orders would be by the Local Highway Authority. (See condition 9 of the attached draft decision notice.)</p>
<p>Lack of provision of disabled car parking spaces.</p>	<p>Transport for London and the Council's Principal Highways Engineer have assessed the proposed car parking provision and consider it to be acceptable and compliant with London Plan and Local Plan policies.</p>

Lack of Electrical Vehicle Charging Point Provision.	Transport for London and the Council's Principal Highways Engineer have assessed the proposed electric vehicle parking provision and consider it to be acceptable and compliant with the London Plan and Local Plan policies. A condition for the location of the electric vehicle parking is recommended. (See condition 10 of the attached decision notice.)
<b>Flood Risk and Drainage</b>	
The proposal poses risks to groundwater and watercourses.	The Environment Agency and Environmental Health have assessed the Geoenvironmental information that has been submitted and has raised no objection to the proposal in terms of risk to groundwater or watercourses. A condition preventing the infiltration unless agreed by the LPA is recommended. (See condition 24 of the attached decision notice.)
<b>Climate Change Mitigation, Sustainability and Environmental Protection</b>	
The proposal does not include adequate remediation for contaminated land.	The geoenvironmental information has been assessed by both the Environment Agency and the Council's Environmental Health team who have raised no objection to the submitted information or the proposed remediation strategy.
The proposed materials would contribute to carbon dioxide emissions and climate change.	The proposal would result in a saving of regulated carbon dioxide emissions over Part L of the UK building regulations of 135%, of which 120% is through on renewable site energy generation through solar photovoltaic panels. In addition the BREEAM accreditation which is secured by condition takes into account the materials used in construction when the final assessment is made. (See condition 29 and 30 of the draft decision notice.)
<b>Archaeology</b>	

Lack of information on the potential for archaeological remains.	Historic England's Greater London Archaeological Advisory Service have been consulted and wrote "having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest. Previous archaeological fieldwork and assessments for the site have shown the archaeological potential to be very limited, therefore no further archaeological work is required."
<b>Employment and Skills</b>	
Lack of Training Opportunities	The applicant has agreed to an Employment and Skills clause to be secured within a S106 agreement which will provide work experience opportunities to local people during the operational phase of the development.
<b>Other Issue</b>	
The RDF will comprise materials which should be recycled.	The National Planning Policy for Waste 2014 is clear that Local Planning Authorities should concern themselves with implementing the planning strategy in the Development Plan but are not responsible for the control of processes which are a matter for the pollution control authorities. The Environment Agency is responsible for the licensing and permitting of waste management facilities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.
The proposal does not include the destination of the RDF fuel.	The planning statement confirms that the RDF would be used in Energy Recovery Facilities across the UK and Europe. This means that the RDF would fall within "other recovery" in the waste hierarchy.

Insert paragraph 3.14 to read:

**The objections received from Councillor Pelling are outlined in the table below with the officers response to each of the comments raised:**

Objection Received	Officer Comments
<b>Land Use</b>	
The application has not assessed the carbon outcome from the development.	The main purpose of the end to end Carbon Outcome assessment is to ensure energy from waste facilities demonstrate they are extracting as much energy as possible from waste. In terms of the proposed development it is only necessary to demonstrate that the proposal is implementing the waste hierarchy, with only material which cannot be recycled used to make RDF. This has been assessed by the GLA who have raised no objection to the proposal on this matter.
<b>Highways and Car Parking</b>	
The proposal would result in additional traffic and congestion within Croydon.	The application has been assessed by both the Senior Highways Officer and Transport for London who have raised no objection to the proposal in terms of significantly adverse impact on the public highway. Croydon Council has raised concerns of the routing of the HGV traffic along Coomber Way and Ampere Way, however the site benefits from an extant permission which could generate more trips to and from this site, and the Transport Assessment submitted with the application took into account committed and proposed developments such as Pro-Logis, the ERF and 118 Beddington Lane. Therefore the cumulative impact on the development has been considered in the Transport Assessment.
The proposal would result in wear and tear to tramlines.	Transport for London have removed their concern in respect to the proposal impact on the operation of the tram service and any wear and tear to the tramlines.

<b>Climate Change Mitigation, Sustainability and Environmental Protection</b>	
The proposal should comply with the London Borough of Croydon’s Air Quality guidance and policies.	The proposal is within the administrative boundary of the London Borough of Sutton and as such the only policies which are material in the determination of this planning application are those of the London Borough of Sutton.
The proposal requires further information on noise and vibration.	The proposal has been assessed by the Council’s Environmental Health Officer who raised no objection to the proposal on noise grounds. In addition a condition controlling the hours of construction is recommended.

Amend paragraph 5.5 to read:

The South London Waste Plan was adopted by the Council on 5 March 2012, and is a development plan document which comprises the development plan for Sutton along with the Sutton Local Plan 2018 and the London Plan 2016. All of the development plan documents are up to date with the South London Waste Plan (SLWP) running until 2021 and commencement of work **has begun** to produce a successor of that plan with the four partner Boroughs: Sutton, Merton, Croydon and Kingston.

Amend paragraph 5.29 to read:

**The western part of the site and Mile Road are designated as SINC.**

Amend paragraph 5.68 to read:

It is noted that Croydon Council has raised concerns to the proposal with respect to the routing of the HGV traffic and potential for congestion along Coomber Way, **Ampere Way** and the A23 but also the veracity of the modelling of the traffic assignment. The modelling has been assessed by both TfL and the Council’s Highways Department who both support the proposal and raise no objection to the routing of the HGV traffic along Coomber Way and Ampere Way to the A23. It should also be noted that the A23 forms part of TfL’s road network with TfL acting as the Highway Authority. Considering that TfL have no objection to the routing of the traffic onto the A23, this should be given the requisite weight when considering the highways impact of the proposal. Furthermore the Transport Assessment submitted has included modelling for committed and proposed developments including the ERF, the Prologis Site and 118 Beddington Lane.