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Your Ref: PRE2018/00030

Contact

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Centre:

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Please ask for:

Sarah Buxton

Date:

25 October 2018

Mr Pollard
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Please reply to:

London Borough of Sutton

24 Denmark Road
CARSHALTON
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*Strategic Director -
Environment & Leisure*

Mary Morrisey

Chief Executive

Niall Bolger

Dear Mr Pollard,

**Re: Town and Country Planning Act 1990 (As Amended)
79-85 Beddington Lane, Beddington, CR0 4TH**

I write further to your request for pre-application advice which was valid on the 28th March 2018 and the subsequent meeting on 9th April 2018 with Sarah Buxton, Richard Green and Fiona Lander.

This pre-application submission relates to 79-85 Beddington Lane, Beddington for a proposed waste management facility, primary functions to include refuse derived fuel preparation (RDF), recyclable, bulking and transfer and waste/ recyclables segregation.

PLANNING HISTORY

There have been a number of applications on the site, with the most recent being:

2009/60763/FUL 'Redevelopment of the site as an enclosed and fully landscaped waste management facility comprising main waste tipping and sorting building, recovered materials storage bays, detached offices/staff welfare building and adjoining highway improvements to Beddington Lane. Provision of 23 car parking spaces, 60 HGV spaces and 30 cycle spaces'. Granted 23.5.2011.

2010/63071/FUL 'Retrospective application for temporary permission for continued use of land and buildings and retention of associated operational development as waste transfer, processing and recycling facility' granted 1.8.2010 for a temporary period which expired on the 1 August 2014.

2012/65418/NMA 'Non material amendment to planning decision 2010/63071/FUL: - Addition of free standing temporary enclosure of RDF baler plant to protect against migration of fugitive waste emissions' granted 10.2.2012.

2012/66219/FUL 'Submission of required restoration works by 31 January 2013 in connection with approved temporary planning permission expiring on 1 August 2014 for continued use of land and buildings and retention of associated operational development as a waste transfer, processing and recycling facility (Variation of condition 3 of app. no. D2010/63071/FUL which required details of restoration works to be submitted within twelve months of 1 August 2011)' granted 18.10.2012.

2013/68435/NMA 'Non Material Amendment to approved planning application D2009/60763/FUL - Add new Planning condition listing all those drawings originally listed as 'Informative' item 2' granted 10.12.2013.

2014/69227/FUL 'Erection of an external air cooling condenser plant to serve proposed waste management facility on adjacent site approved under application reference number D2009/60763/FUL together with a green wall and extended roof at front'. Granted 22.9.2014.

2014/69228/FUL 'Provision of flue stack above roof line of main processing building variation of condition 29 of previously approved application reference number 09/60763/FUL (as amended by non-material amendment application reference 13/68435/NMA)'. Granted 25.9.2014.

SITE SPECIFIC DESIGNATIONS

The application site has been designated as being within an Archaeological Priority Area, Site of Importance for Nature Conservation (SINC 7), Existing Waste Site Safeguarded by 2011 London Plan, Air Quality Management Area, Strategic Industrial Location and Metropolitan Green Chain.

The site is adjacent to Industrial Areas with Sites Suitable for Waste Facilities, Metropolitan Open Land, Wandle Valley Regional Park and Site Allocation S100 – Beddington Lane Road Improvement Scheme.

The SINC designation is part of the larger Beddington Farmlands SINC 7 (M92), which is of Metropolitan Importance (Grade 1). SINC 7 is described as ‘a working landfill site, currently in the process of being restored. Active landfill is due to end in early 2018, with much of the site being restored for nature conservation and limited public access. The area of the SINC designation is larger than the landfill operation.

Habitats on site include lowland wet grassland for priority bird species, such as lapwing, snipe and yellow wagtail, whilst reedbed, acid grassland, lowland heath and woodland such as scrub will turn into the largest and most diverse area for wildlife in Sutton. Trails and hides will provide opportunities for the public to experience the scarce species on site.

The application site is one of the safeguarded sites listed in Schedule 1 of the South London Waste Plan. Under Policy WP3, safeguarded sites will be encouraged to maximise their potential for waste management.

POLICY BACKGROUND

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when determining a planning application, regard is to be had to the development plan, and the determination shall be made in accordance with the development plan, unless material considerations indicate otherwise. The development plan for the London Borough of Sutton comprises the following documents:

- London Plan 2016
- Draft London Plan 2017
- Sutton’s Local Plan 2018
- The South London Waste Plan 2012

Also a material consideration in determining planning applications are:

- National Planning Policy Framework (NPPF)
- National Planning Policy Guidance (NPPG)
- Adopted London Borough of Sutton Supplementary Planning Guidance Documents
- Human Rights Act 1998
- Equality Act 2010

London Plan 2016:

- 2.6 - Outer London: vision and strategy
- 2.7 - Outer London: economy
- 2.8 - Outer London: transport
- 2.17 Strategic Industrial Locations
- 2.18 - Green Infrastructure: The Network of Open and Green Spaces
- 4.1 - Developing London’s Economy
- 4.12 – Improving opportunities for all
- 5.1 - Climate change mitigation
- 5.2 - Minimising carbon dioxide emissions

- 5.3 - Sustainable design and construction
- 5.7 - Renewable energy
- 5.8 – Innovative energy technologies
- 5.9 - Overheating and Cooling
- 5.10 - Urban Greening
- 5.11 - Green roofs and development site environs
- 5.12 - Flood risk management
- 5.13 - Sustainable drainage
- 5.14 - Water quality and wastewater infrastructure
- 5.15 - Water use and supplies
- 5.16 - Waste net self-sufficient
- 5.17 - Waste capacity
- 5.18 - Construction, excavation and demolition waste
- 5.21 – Contaminated land
- 6.1 - Integrating Transport and Development – Strategic Approach
- 6.2 - Providing public transport capacity and safeguarding land for transport
- 6.3 - Assessing effects of development on transport capacity
- 6.4 - Enhancing London’s transport connectivity
- 6.5 -Funding Crossrail and other strategically important transport infrastructure.
- 6.7 - Better streets and surface transport
- 6.9 - Cycling
- 6.10 - Walking
- 6.11 - Smoothing traffic flow and tackling congestion
- 6.12 - Road network capacity
- 6.13 - Parking
- 7.1 - Lifetime neighbourhoods
- 7.2 - An inclusive environment
- 7.3 - Designing out crime
- 7.4 - Local character
- 7.5 - Public realm
- 7.6 - Architecture
- 7.7 - Location and design of tall and large buildings
- 7.8 - Heritage assets and Archaeology
- 7.14 - Improving Air Quality
- 7.15 - Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscape
- 7.17 - Metropolitan Open Land
- 7.19 - Biodiversity and access to nature
- 7.21 - Trees and woodlands
- 8.2 - Planning obligations
- 8.3 - Community infrastructure Levy

Available to view at <http://www.london.gov.uk/thelondonplan/thelondonplan.jsp>

Sutton Local Plan:

- Policy 1 Sustainable Growth
- Policy 5 Wandle Valley Renewal
- Policy 14 Industrial Land and Waste Management
- Policy 15 Industrial Use

- Policy 24 Green Belt and Metropolitan Open Land
- Policy 26 Biodiversity
- Policy 28 Character and Design
- Policy 29 Protecting Amenity
- Policy 31 Carbon and Energy
- Policy 32 Flood Risk and Sustainable Drainage
- Policy 33 Climate Change Adaption
- Policy 34 Environmental Protection
- Policy 35 Transport Proposals
- Policy 36 Transport Impact
- Policy 37 Parking
- Policy 38 Infrastructure Delivery
- Policy 40 Site Allocations – S100 Beddington Lane Road Improvement Scheme

Supplementary Planning Guidance/Documents:

- SPD1 - Designing Out Crime
- SPD14 - Creating Locally Distinctive Places
- SPD 5 – Planning Obligations
- SPD 13 – Transport Assessments and Travel Plans

Available to view at <http://www.sutton.gov.uk/index.aspx?articleid=660>

The South London Waste Plan:

The South West London Waste Plan (SWLP) was adopted in March 2012 and is a joint waste development plan document and forms part of the LDF for The London Borough of Sutton, The London Borough of Croydon, The London Borough of Merton and The Royal Borough of Kingston. It is used by the Local Planning Authorities for the determination of planning applications relating to waste facilities.

The following policies below set out the SLWP are deemed to be of importance with the proposed application:

- Policy WP2 – Strategic Approach to other Forms of Waste
- Policy WP3 – Existing Waste Sites
- Policy WP7 – Protecting and Enhancing Amenity
- Policy WP9 – Planning Obligations

Policy WP3 highlights that national and regional policy recognises local authorities have a responsibility to safeguard current existing waste sites and to maximise their potential, particularly when inside a Strategic Industrial Location.

Policy WP7 underlines that developments for waste facilities will be required to demonstrate that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people and the environment.

PLANNING ISSUES

Principle of Development:

The National Planning Policy Framework (NPPF) requires the Council to make the most efficient use of land by maximising the re-use of previously developed land and the conversion of existing buildings.

The London Plan Policies 2.17 (Strategic Industrial Locations) and 4.4 (Managing Industrial Land and Premises) requires boroughs to identify and protect Strategic Industrial Locations and develop local policies and criteria to manage locally significant and other smaller industrial sites outside such locations.

Policy 14 'Industrial Land and Waste Management' and Policy 15 'Industrial Use' of the Sutton Local Plan seek to support proposals which intensify industrial floorspace in the Beddington Strategic Industrial Areas.

The proposed erection of a waste management facility, which would comprise refuse derived fuel preparation, recyclable and bulking transfer, waste and recyclables segregation, is in line with the 2011 planning permission of the development of enclosed waste management facility and Policy WP3 of the Waste Plan.

The boroughs of the South London Waste Plan pool their waste capacity in order to meet the target of sufficient waste capacity to meet the arisings occurring in the four boroughs. The Council considers that this proposal would assist in meeting this target as it involves a higher throughput than the operation currently achieves at Benedict's Wharf, Mitcham. However, the council is concerned that it may not be able to count all or some of the throughput of the proposal to its targets if the refuse derived fuel is used at the Energy Recovery Facility in Beddington as this would constitute 'double counting'. From a purely waste capacity target viewpoint, it would be preferable if the refuse derived fuel was sent to another facility outside of the South London Waste Plan area.

As such, it is considered that the proposal is acceptable in principle, subject to all other material considerations discussed below. It is understood at present you are not proposing a material recycling facility, however, this is being included in the overall design in order to future proof the development.

Design Quality and Impact on Streetscene:

The National Planning Policy Framework (NPPF) states at paragraph 64 that "Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions." Policy 28 of the Sutton Local Plan and SPD14 'Urban Design' requires development to respect or reinforce the character and identity of the area and avoid developments which do not integrate well into the surroundings.

No elevations were submitted with the application and as such I am unable to provide detailed comments in respect of the proposal. The comments given in this letter are on the drawings submitted as part of the pre application. As the Council does not have copies of the drawings seen in the meeting, these have yet to be submitted as part of the pre application inquiry and no comments are made on these drawings at this time.

Whilst the application site is within an industrial setting, policy 28 of the Sutton Local Plan states that new development should complement or improve the character of

the area through the use of high quality architectural design and layouts, ensuring integration with the surrounding buildings, together with the use of high quality materials. Further to this point, it states that the successful integration of new development is a fundamental planning consideration. New development does not have to replicate the form and design styles of the surrounding properties to achieve successful integration, and innovative design solutions of high quality should be encouraged.

As the site application is within a highly visible location, a high quality proposal will be expected. The proposal should be developed to make a positive contribution to the surrounding area and its setting. The proposal should also incorporate a landscape strategy appropriate to its location, given that the site is within a SINC, Metropolitan Green Chain and being adjacent to Metropolitan Open Land and Wandle Valley Regional Park. The site has public frontages to the east, south and will have a western frontage with the development and opening of the farmlands/ park.

No details were provided of the proposed design of the waste management facility, storage bays, external plant and infrastructure, or the office building as part of the formal pre-application submission. The officers noted that as part of the submitted pre-application a maximum building height of circa 15 metre was stated, however during the meeting a 17 metre height was given. A comparison with the permitted scheme illustrates the reference made to being below the 18.5 metre maximum height of the permitted scheme refers to the height of the roof lights, the maximum height of the permitted roof is shown as 16.333 metre. Furthermore, the approved scheme was for a sinuous roof form rising from 5.599 metres on its western edge. The approved building was also set back from the western boundary with a bund and significant area of planting to be provided to mitigate the impact and soften the boundary with the Metropolitan Open Land and views from the Regional Park.

The Council queries the requirement for the large areas of external hard surfacing; including the 25 metre manoeuvring apron; and consequent siting of the proposed main building nearer the Metropolitan Open Land and Regional Park. The permitted scheme allowed for significant planting to the west of the site to mitigate the impact of the industrial development on the Metropolitan Open Land and Park. The need for the number of openings shown on the proposed site layout is questioned and officers have requested details showing how the layout of the building will function. The recent permission on the Energy Recovery Facility to the north of the site includes a requirement that the doors on the tipping hall shall be closed immediately after the arrival or departure of a delivery vehicle and it is expected a similar requirement would be imposed on the proposed development.

No details were provided of the bale storage, quarantine bay, wood bulking area, refuelling area, gatehouses and service bay on the submitted drawings. During the meeting you advised the quarantine and wood bulking bay would be 11.5 metres in height. These buildings, the sprinkler tanks and the pump house would be particularly visible from the highway and you will need to demonstrate how they meet the objectives of the environmental improvement of the Industrial Area and Beddington Lane. On the information given it is not considered this can be achieved solely through the design of the building(s) and you will need to relocate these further back from the highway. Officers note the approved scheme included a substantial area of soft landscaping along the boundary of the site with Beddington Lane which cannot be accommodated on the proposed site layout.

All material storage areas must be enclosed in order to comply with the requirements of the waste plan. This will include the proposed bale storage area. Given the visibility of the southern area of the site from the wider area you will need to ensure the design of the bale storage area positively contributes to the environmental enhancement of the area.

A high voltage power line goes over the site. Whilst the National Grid will be consulted on the proposed planning application you are encouraged to incorporate their requirements at an early stage of the design process. A Rising Main passes underneath the site. Again whilst the water authority will be consulted on the proposed planning application you are encouraged to incorporate their requirements at an early stage of the design process.

Parking and Highways:

Policy 36 of the Sutton Local Plan states that developments will be assessed for their impact on the highway and public transport network as well as the local environment and should be located so as to minimise any adverse impact on the highway network and maximise the use of sustainable mode of transport. Policy 28 of the Sutton Local Plan (j) states that developments should not be dominated by car and cycle parking.

It was noted in the meeting that discussion and amended plans had been supplied to the Councils Highways Department which had not been shared with the Planning Department.

The comments below have been provided by the Councils Highways Department:

Footway across site entrance:

The Highways Department have advised that the proposed new footway, should span the entire front of the application site, to connect with the footway at the southern end of the Mile Road headway at its junction with Beddington Lane.

There is a bus stop outside of the site and the Councils will require assurances that this will still be able to service bus patrons visiting the application site.

Right hand turn lane:

It is understood the designers have suggested they would move the car park entrance south, which would reduce the amount of vehicular storage. The Council will require detailed plans to demonstrate that there would not be an adverse impact on the highway and any provision for queueing vehicles would be adequate enough so as not to cause any blocking of the main Beddington Lane.

Given the scale of the proposal the Council would require a full Transport Assessment, to include the generation, distribution and a Haul Route. We request that HGV's access and leave the site from the north - a right-in, left-out arrangement at the Mile Road access. Details of number of vehicles manoeuvring by day and at peak periods, as well as size of vehicles will be required.

Highway Widening:

It is understood plans have been submitted to highways showing highways widening. Furthermore, there has been separate correspondence with highways after the pre application meeting regarding land ownership and development of this part of the proposal.

Car Park:

The plans do not seem to accommodate a turning head for vehicles who are unable to park and therefore have to turn around and leave. This could end up in vehicles trying to exit the car park by reversing onto Beddington Lane. At present the proposed car parking layout will need to be re-designed so that no cars are forced to reverse onto Beddington Lane.

In addition, you will be required to submit a work-place travel plan, demonstrating how any parking proposals are justified. Provision would be made by way of a S106 agreement for continuous monitoring of the Travel Plan.

Mile Road:

You are advised to consider future use of Mile Road by third parties in the design of the proposed development.

Environmental Protection:

Policy 34 of the Sutton Local Plan seeks to achieve the highest design and environmental standards possible and to future proof buildings in terms of changing climate and to cut pollution and address the causes and impacts of climate change by promoting low carbon and environmentally sustainable developments.

The Councils Environmental Health Officer has advised that in respect of the submitted application, the Council would require further information to be submitted in order for Environmental Health to make an assessment of the impacts of the proposed development on surrounding occupiers and the environment.

The information that would need to be submitted to accompany the planning application is as follows:

- Air Quality Assessment
- Construction Management Plan
- Noise and Vibration Assessment
- Contaminated Land Assessment / Phase I Desktop Study
- Odour Assessment and Odour Management Plan

Air Quality Assessment:

The Councils Environmental Health Officer has advised that an air quality assessment will be required with any future planning application. Should the assessment deem the development to be viable subject to mitigation measures, then we will ensure that these are undertaken via conditions.

Information that should be included in AQ Assessments:

- Relevant Policy (National and Local)
- Assessment methodology
 - Baseline conditions

- Modelling tool
 - Input data (e.g. sources :traffic/ point source, background and Met. data)
 - Other major committed developments within the vicinity
 - Relevant receptors
 - Assumptions (e.g. street canyon)
- Assessment of impacts – ‘Do nothing’ vs. ‘Development Scenario’
 - Determination/ description of the perceived ‘magnitude of impact’
 - Determination of ‘Significance’
 - Use recognised, validated dispersion models such as Aermoc or ADMS to assess impacts. Screening tools such as DMRB and the DEFRA Industrial Nomograms should only be used where impacts are demonstrably trivial and in no cases for assessing the impact of major developments.
 - Wherever possible models should be verified against existing data sets (LB Sutton will make all of its Air Quality data available to developers free of charge), where this isn’t possible data may need to be gathered by the applicant.
 - Air Quality Impact Assessments with very high verification factors (above 2) will be rejected.
 - All impacts of a given development should be considered together; separate modelling of traffic and heating impacts is not acceptable.
 - The cumulative impacts from the development and other major committed developments within the vicinity need to be considered and detailed.
 - Both long and short term Air Quality impacts and standards must be considered.
 - As well as the effect on local Air Quality, the impact of ambient air quality on the users of the development must be considered. Where appropriate mitigation measures should be proposed.
 - Industry best practice and the minimum standards for ‘Detailed Assessments’ laid out in DEFRA’s Technical Guidance should be adhered to.
 - Where specific details are not available at the application stage, for example if the final technology decisions for a CHP unit have not been made, indicative values may be used. These values may subsequently be required, by condition, as minimum standards to be met by the development.

Useful Guidance Document – Air Quality Planning Guidance:

http://www.iaqm.co.uk/text/guidance/epuk/eq_guidance.pdf

The Construction Management Plan shall identify the potential for impacts from dust and emissions during the demolition and/or construction phase upon local air quality and surrounding residents. The CMP must contain details of the measures that will be implemented to control dust, noise and other environmental impacts of the development and to which there must be adherence during the relevant phase.

This includes meeting the requirements of the Low Emission Zone for Non-Road Mobile Machinery where relevant plant or vehicles are being used.

The Contaminated Land Assessment (Phase I Desktop Study) shall be an assessment of the risks posed by any contamination, carried out in accordance with British Standard BS10175: Investigation of Potentially Contaminated Sites - Code of Practice and the Environment Agency’s Model Procedures for the Management of Land Contamination (CLR 11) (or equivalent British Standard and Model Procedures if replaced), and submitted to and approved in writing by the Local Planning Authority.

Should remediation be required, no development shall commence until a report specifying the measures to be taken, including the timescale, to remediate the site to render it suitable for use shall be submitted to and approved in writing by the Local Planning Authority.

Regarding the proximity of receptors, the closest residential properties are those which have been identified on Beddington Lane and Therapia Lane (Portland Cottages). Whilst the Councils Environmental Health Department do not consider the business use to be sensitive receptors, the local authority will still have a duty to investigate any complaints about nuisance made by occupiers of the surrounding premises.

Sustainability:

The Councils Sustainability Officer has provided the following information in respect of the details submitted:

BREEAM - Policy 31

The main building (6,500 m²) as a major non-residential development would need to demonstrate an 'Excellent' rating under the appropriate BREEAM New Construction 2018 scheme. This would require submission of:

- a BREEAM pre-assessment estimator or a BREEAM Interim (Design Stage) Certificate with any planning application;
- a BREEAM Interim (Design Stage) Certificate prior to commencement;
- a BREEAM Final (Post-Construction) Certificate prior to the start of operations on site (or within 3 months).

Energy/ CO₂ - Policy 31

An Energy Statement will be required with the submission of any future planning application and will need to show how the proposed development will:

- minimise regulated CO₂ emissions through application of the Mayor's energy hierarchy: (1) Be lean (2) Be clean; and (3) Be green;
- achieve a minimum 35% on-site reduction in regulated CO₂ emissions below the target emission rate (TER) based on Part L2A of the 2013 Building Regulations; and
- achieve at least a 20% reduction in total CO₂ emissions (regulated and unregulated) through on-site renewable energy generation.

The Energy Statement should include calculations of the energy demand (kWhrs per annum) and associated CO₂ emissions covered by Part L2A of the Building Regulations at each stage of the Mayor's energy hierarchy. These calculations should establish the TER and the Building Emissions Rate (DER) based on 'as designed' BRUKL outputs and, separately, emissions associated with non-building regulations elements. Details of all proposed energy efficiency measures and renewable technologies should be provided, with consideration given to each renewable technology which is potentially technically feasible. In preparing the Energy Statement, the applicant should have regard to the Mayor's 'Guidance on preparing energy assessments' (March 2016) as amended.

Flood Risk:

Site Specific FRA:

In line with Local Plan Policy 32 , London Plan Policy 5.13 and the Mayor's Sustainable Design and Construction SPG, a site specific Flood Risk Assessment (FRA) incorporating a scheme for the management of surface water run-off should be provided in support of any planning application which:

- identifies appropriate site drainage and flood risk management measures, including SuDS, in order to manage surface water run-off as close to its source as possible in accordance with the Mayor's drainage hierarchy in London Plan Policy 5.13.
- provides details of the design storm period and intensity, proposed SuDS measures to delay and control the rate of surface water discharged from the site and proposed measures to prevent pollution of the receiving groundwater and/or surface water;
- includes calculations carried out by an appropriately qualified professional to show that the peak run-off rate for the 1 in 100 year 6-hour rainfall event (plus 30% for climate change) will be as close as reasonably practicable to the greenfield run-off rate for the same event;
- where greenfield run-off rates cannot be achieved, and methods of drainage include those lower down the Mayor's drainage hierarchy, evidence should be provided to justify the proposed measures and to demonstrate that the peak run-off rate for the 1 in 100 year 6-hour rainfall event (plus 30% for climate change) will be no more than 3 times the calculated greenfield run-off rate for the same event;
- demonstrates that the 1 in 30 year rainfall event (plus 30% for climate change) can be contained without flooding; any flooding occurring between the 1 in 30 and 1 in 100 year event (plus 30% for climate change) will be safely contained on site; and that rainfall in excess of the 1 in 100 year event is managed to minimise risks
- gives consideration to green roofs, walls or site planting measures where feasible .

All major planning applications should be supported by a completed Drainage Assessment Form (DAF) in order to demonstrate that the Council's minimum performance standards for SUDS have been met. The DAF provides a template for the run-off calculations and further details that are required alongside site drawings and other relevant drainage information. Please note that although the DAF requests information on other sources of flood risk (such as fluvial, groundwater and sewer flooding), it does not in itself constitute a site specific Flood Risk Assessment (FRA) which should be prepared for all developments located within Flood Zones 2 and 3, major developments exceeding 1 hectare in Flood Zone 1 and all developments within a critical drainage area (CDA). Both documents should be submitted with any future application.

Policy 32 of the Sutton Local Plan aims to ensure the risk of flooding is not increased by new development and seeks to avoid, manage and reduce all sources of potential flood risk to and from new development and adapt to the future impacts of climate change.

All major planning applications should be supported by a completed Drainage Assessment Form (DAF) in order to demonstrate that the Council's minimum performance standards for SUDS have been met. The DAF provides a template for the run-off calculations and further details that are required alongside site drawings and other relevant drainage information.

Please note that although the DAF requests information on other sources of flood risk (such as fluvial, groundwater and sewer flooding), it does not in itself constitute a site specific Flood Risk Assessment (FRA) which should be prepared for all developments located within Flood Zones 2 and 3, major developments exceeding 1 hectare in Flood Zone 1 and all developments within a critical drainage area (CDA). Both documents should be submitted with any future planning application.

Proposed developments should also incorporate effective sustainable drainage (SUDs) measures as part of the design and layout of the development in order to manage surface water run-off as close to its source as possible and achieve the following minimum SUDs performance standards through application of the Mayors drainage hierarchy:

You are advised to contact the Environment Agency as they have their own process for giving pre application advice. They can be contacted directly at kslplanning@environment-agency.gov.uk.

Climate Change Adaption:

As a major development of a previously developed site you will be required to comply with Policy 33 of the Local Plan including the incorporation of green walls and roofs where feasible and achieve improved Green Space Factor (GSF) score of at least +0.2 compared to baseline GSF score for the site prior to redevelopment.

The emphasis is on net gain and you will be required to detail how you came to the baseline justification with the application. Further advice can be provided as part of the extended pre application.

Biodiversity:

London Plan Policy 5.11 on 'Green roofs and development site environs' states that "*Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible...*". This requirement is also set out in Local Plan Policy 33 on 'Climate Change Adaptation'.

Policy 5 'Wandle Valley Renewal' of the Sutton Local Plan seeks to enhance the quality of the River Wandle, increase its benefits for people and wildlife and to protect and enhance the borough's biodiversity.

In addition, Policy 26 'Biodiversity' states that the council will protect and enhance Sites of Importance for Nature Conservation, Green Corridors and biodiversity. Major new development should result in no net loss in biodiversity value, as assessed against the DEFRA biodiversity offsetting metric, the Environment Bank Biodiversity Impact Calculator or any metric which the council subsequently adopts formally. New development should incorporate opportunities to enhance biodiversity, wherever possible.

The policy continues to states that the council will not grant planning permission within or adjacent to a SINC where there would be a damaging impact on the nature conservation value or integrity of the site, unless: (i) the need for and the benefits of the development clearly outweigh the harm. (ii) where there are no reasonable alternative sites that would result in less harm. (iii) where development can demonstrate no net loss for biodiversity and, where possible, net gains for biodiversity by providing mitigation and/or compensation

measures.

The SINC designation is part of the larger designation of the Beddington Farmlands as a Site of Metropolitan Importance for Nature Conservation. Approximately 37% (0.91ha) of the site falls within the SINC designation, of which 0.22ha had planning permission to be hard surfaced (the former Mitcham Belle site). This leaves a balance of 0.69ha (6900m²). In the context of the unauthorised development of the SINC and the Mitcham Belle planning permission it was considered unreasonable to refuse planning application reference D2009/60763/FUL on SINC grounds alone, because of the inclusion of the land within a Strategic Industrial Area and the inclusion of the creation, management and enhancement of wildlife habitat and natural landscape as part of the application. These comprised:

Green Roofs	0.33 ha
Plant containment	0.03ha
Wire/ plant cover	0.19ha
Green wall	0.02ha
Native tree and shrub planting	0.33ha
Total	0.9ha

In addition to these measures the applicant made a financial contribution under a section 106 agreement for two projects in Beddington Park, to contribute to the wider biodiversity value of the adjoining SINC. An additional green wall was approved under planning application D2014/69227 and a number of bird and bat boxes would have been provided on site.

As part of this pre application submission no detailed plans have been provided to indicate the level, species and quantum of biodiversity and soft landscaping features. Any proposed development on this site will be expected to include significant areas of wildlife habitat to mitigate for the impact on the SINC.

In addition, due to the condition of the existing buildings on site, there is the potential for bats to be present. As such, it is recommended that a bat survey is undertaken before any work is on these buildings and should form part of any future planning application. Details of all external lighting must be assessed for their impact on the wildlife/ biodiversity.

Trees and Landscaping:

Policy 28 of the Sutton Local Plan states that the Council will grant planning permission for developments which make a positive contribution to the street frontage, streetscene and or public realm, such as using railings and low walls where appropriate and responds to natural features and retains trees, hedges and other landscape features and spaces of amenity value, where possible.

As referred to above no detailed plans have been submitted as part of the application submission. The proposal indicated five proposed trees to the front of the site (adjacent to the pump house and a number of car parking spaces). The position of these trees in such close proximity to the pump house and parking bays are considered to be ill-conceived and would inevitably lead to a conflict of uses and pressure to remove the trees at a later date.

Archaeology:

The site lies within the southern boundary of a designated Archaeological Priority Area (APA) where policy 30 of the Sutton Local Plan is applicable.

The application site falls within an Archaeological Priority Area and should an application be submitted then Historic England as a statutory consultee will be consulted.

You would be expected to submit an archaeological evaluation, which assesses the archaeological implications of the development and should propose effective mitigation measures to safeguard the area from adverse development.

Community Infrastructure Levy (CIL) and Planning Obligations:

The Community Infrastructure Levy (CIL) which came into force on 01 April 2012 which changes the way planning authorities seek financial contributions. The Mayor of London has chosen to implement CIL in all London Boroughs to assist in financing Crossrail. From 1st April 2012 the Mayor requires all developments (education and health purposes exempted) to pay £20 per sq metres of floor space, including index linking. CIL is a non-negotiable sum.

It is expected further planning obligations would also be required in line with the adopted policies and supplementary planning guidance. Advice on this can be given once more details of the proposal is known. Heads of Terms are expected to be similar to the permitted scheme.

Public Consultation:

The owners/ occupiers of the adjoining properties will be consulted on any planning application submitted. However, you may find it beneficial to discuss the proposed development with your neighbours prior to submitting any application, addressing any concerns before submission to the Local Planning Authority. You may also find it of benefit to contact the ward members before submitting an application.

We will advise you of the ward members after the election on the 3rd May 2018.

Conclusion:

In summary, it is considered that the proposed application is considered acceptable in principle, however, further details are required in respect of the issues raised above, specifically in respect to biodiversity measures, design, layout and transport impacts.

SUBMITTING A PLANNING APPLICATION:

You can submit a planning application either online via the Planning Portal at www.planningportal.gov.uk or in paper form. The following is required:

- Application form – form no. 1 at <http://www.sutton.gov.uk/index.aspx?articleid=1270> (original and three copies of completed form, signed and dated, for paper submission). Please ensure the

relevant ownership certificate (A, B, C or D of section 11) and the agricultural land declaration (section 12) are signed.

- Site location plan at a scale of 1:1250 and a north arrow with the application site outlined in red (original and three copies for paper submission).
- Existing and proposed site plans (four copies for paper submission).
- Existing elevations (four copies for paper submission).
- Proposed elevations (four copies for paper submission).
- Existing floor plans (four copies for paper submission).
- Proposed floor plans (four copies for paper submission).
- Proposed street scene elevation.
- Design and Access Statement.
- Planning Support Statement (not essential but recommended).
- Archaeological Assessment
- Hard and soft landscaping plans
- Bat survey
- Flood Risk Assessment and site drainage details.
- Energy Statement
- BREEAM pre assessment/ BREEAM interim certificate
- Contaminated land assessment (phase 1 desktop study)
- Transport Assessment and Work Place Travel Plan
- Construction Management Plan
- Contaminated Land
- Air Quality Assessment
- Construction Management Plan
- Noise and Vibration Assessment
- Contaminated Land Assessment / Phase I Desktop Study
- Odour Assessment and Odour Management Plan
- The correct fee. Payment is taken in cash or by credit or debit card at the reception desk of the planning offices (Denmark Road, Carshalton), by credit or debit card over the telephone by logging a call with the contact centre on 020 8770 5070. The Planning Portal also has an online option for paying with credit or debit card.
- CIL Assessment Form (Determining whether a development may be CIL liable form)

Please ensure you state the pre-application reference number at section 6 of the application form.

I hope this information is useful. Please note that any opinions expressed are informal, offered in the spirit of helpfulness without prejudice to any subsequent decision that the Local Planning Authority may make. A planning application will be subject to the Council's standard publication procedure, which includes notifying neighbouring properties. The information contained within this letter is correct in terms of the status of planning policy and of the site and the immediate locality at time of writing.

If you have any queries in relation to this letter, please do not hesitate to contact Sarah Buxton on the above number.

Yours sincerely



Fiona Lander
Principal Enforcement Officer

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