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PLANNING STATEMENT

**INFINITY HOUSE, ANDERSON WAY,
BELVEDERE, LONDON DA17 6BG**

Date: May 2021

Ref: 15128a

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Revision	Description	Originated	Checked	Reviewed	Authorised	Date
1	Draft	SS	HS	HS	SP	26.01.2021
2	Draft	SS	HS	HS	SP	01.02.2021
3	Final	SS	HS	HS	SP	02.03.2021
DWD Job Number: 15128a						

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared on behalf of the applicant, in support of an application for full planning permission for a proposed development at Infinity House, Anderson Way, Belvedere, London, DA17 6BG (the 'Site').

1.2 The application relates to the erection of a van storage facility covering the ground and two decks above to serve an existing facility on Crabtree Manorway North, Belvedere. The full description of development is:

“Demolition of existing buildings and redevelopment of the site to provide a deck for the storage of operational vehicles, associated parking, guard hut, welfare block, landscaping, and associated infrastructure.”

1.3 This Planning Statement describes the proposed development and assesses the development against the Development Plan. This statement will also outline the material benefits of the proposal.

1.4 This application is supported by the following technical reports that should be read in conjunction with this Planning Statement:

- Design and Access Statement, prepared by S+SA Architects;
- Transport Statement, prepared by Vectos;
- Noise Impact Assessment, prepared by Delta Simons;
- Air Quality Assessment, prepared by Delta Simons;
- External Lighting Layoutt, prepared by KTA;
- Flood Risk Assessment, prepared by Eireng;
- Drainage Scheme, prepared by Eireng;
- Preliminary Geo-Environmental Risk Assessment (Land Contamination), prepared by Delta Simons;
- Sustainability and Energy Statement, prepared by Envision;
- Arboricultural Survey, prepared by Delta Simons;
- Preliminary Ecological Assessment, prepared by Delta Simons;
- Landscaping Scheme, prepared by Urban Wilderness; and

- Archaeological Desk Based Assessment, prepared by RPS.

1.5 In addition, the following drawings have been submitted with the application to illustrate the proposed scheme.

Table 1.1 – Application Drawings

DRAWING NUMBER	DRAWING TITLE
P01 Rev A	Site Location Plan
P02 Rev B	Existing Site Plan
P03	Topographical Survey
P04 Rev A	Existing Site Sections
P05 Rev D	Proposed Site Plan
P06 Rev C	Proposed Ground Floor Plan
P07 Rev B	Proposed First Floor Plan
P08 Rev A	Proposed Second Floor Plan
P09	Proposed Elevations
P10 Rev B	Proposed Sections
P11 Rev B	External Furniture
P12 Rev A	Gate House Plans and Elevations
P13 Rev C	External Works
P14 Rev B	Transformer Details
P15 Rev B	Substation Details
P16	Welfare Block

1.6 The remainder of this Statement is set out as follows:

- Section 2 describes the site and the surrounding area;
- Section 3 sets out the proposals for the site that are the subject of this planning application;
- Section 4 sets out the relevant national and local planning policies and other material considerations;
- Section 5 assesses the proposed development against the relevant national and local planning policies and other material considerations;
- Section 6 sets out the planning merits of the proposals; and
- Section 7 sets out our overall conclusions.

2.0 SITE LOCATION, DESCRIPTION AND PLANNING HISTORY

Site Location and Description

- 2.1 The Site, which is located in Belvedere, London, comprises of a rectangular shaped plot of land providing existing industrial buildings, an office building an external yard used for storing materials and Heavy Goods Vehicles (HGVs), and a car parking area. At the rear of the Site there are also cyclones, storage silos and tanks associated with the operations at the Site.
- 2.2 There is mature tree planting around the perimeter of the Site, which is especially present along the eastern, western and southern boundary, with a larger wooded area in the south western corner just outside of the site boundary fronting onto Anderson Way. Access to the Site is from Anderson Way via an access point for vehicles and pedestrians controlled with a vehicle gate and separate pedestrian gate.
- 2.3 The Site is bounded to the north by an area of industrial and commercial buildings, including the existing warehouse on Crabtree Manorway North. Directly to the south of the Site is the Horse Roundabout and beyond are industrial and commercial properties in the Belvedere Industrial Area. Belvedere station is located 650 metres to the south. To the south west of the Site there is existing development comprised predominately of residential properties, a Travel Lodge, restaurant and gym.
- 2.4 The Site is not within a Conservation Area and there are no heritage assets on or in close proximity to the Site. The Site is located in Flood Zone 3 (high probability of flooding) with flood defences.

Planning History

- 2.5 A review of the planning history indicates that the current permitted use is General Industrial (Use Class B2) and the Site comprises workshops, production area, warehouses and offices permitted in 1987 under planning permission 87/01481/FUL.
- 2.6 Table 2.1 below sets out the planning history relevant to the Site available on the LPA's website. The permitting history of the Site is all historic (pre-1999) and industrial in nature.

Table 2.1 – Planning History

APPLICATION REFERENCE	DESCRIPTION	DECISION	DECISION DATE
99/02429/FUL	Installation of 3 x 9.5 metre high silos and associated cyclone equipment	Granted with conditions	19/11/1999
98/00906/FUL	New office building and extension to existing warehouse.	Granted with conditions	20/08//1998

92/00351/FUL	Installation of 2 X 100 cubic metre storage silos for expanded polystyrene granules.	Granted with conditions	15/05/1992
88/01220/FUL01	Details: Landscaping proposal	Granted with conditions	16/12/1988
88/01220/FUL	Erection of 33.5m chimney.	Granted with conditions	01/09/1988
88/02266/ADV	3 flag(s) on flagpole(s)	Granted with conditions	18/01/1988
87/01481/FUL	Proposed development comprising Workshops, production area, warehouse and offices.	Granted with conditions	22/10/1987
84/01044/OUT	Outline application for development of land for industrial, warehousing, transport and distribution purposes with vehicular access.	Granted with conditions	27/09/1984

3.0 PROPOSED DEVELOPMENT

- 3.1 The proposed development includes the demolition of the existing warehouse and the erection of a decked van storage facility which would provide dedicated storage facilities for the vans required to operate the existing distribution warehouse at on Crabtree Manorway North. The vans are only used to facilitate the operations at the distribution warehouse through the collection and delivery of packages and/or goods originating from or returning to that distribution warehouse. Without the vans to affect these movements of packages and/or goods, the distribution warehouse cannot operate effectively. Equally, the van storage use on this Site would only take place because the vehicles are required for the distribution warehouse operations. Therefore, the storage of the vans at this Site is a functionally linked necessity for the effective operation of the distribution warehouse.
- 3.2 On new build-to-suit sites, the need for vehicle storage is often built into proposals. On sites such as these, where existing units are operating with limited to no opportunities to adapt the site to meet this operational business requirement, the storage of the vans necessarily has to take place elsewhere. This is the case for the distribution warehouse, and the reason why there is a need to provide a van storage facility a short distance from the distribution warehouse at this Site.
- 3.3 Accordingly, this Site and the distribution warehouse form one single planning unit with the primary distribution warehouse use falling into use class B8 and the proposed van storage use constituting an ancillary use to that primary distribution warehouse B8 use. This means the proposed development will also operate pursuant to Use Class B8 (storage use) as an ancillary use to the primary distribution warehouse use within the overall single planning unit.
- 3.4 The desire for the operator to rely on their own fleet of vans stored at this proposed development site stems from a number of business objectives, which are considered to be material benefits in planning terms.
- 3.5 Firstly, the proposals include 20 percentage EV provision. The operator is aiming to make its operations more sustainable and to this end it is seeking to maximise the number of electric vehicles serving the distribution warehouse. For each electric van used instead of a diesel van, a conservative estimate is that the life-cycle carbon emissions of operating that van have been reduced by 60%+ from 11,533kg CO₂e annually to 3,933 kg CO₂e annually. This includes the emissions from manufacturing the vehicle, the fuel production, the tailpipe and the power plants that make the electricity in the UK. The aim of the operators is to try to power 100% of its operations with renewable energy by 2030. It is conservative to estimate that the life-cycle carbon emission of

operating that van have been reduced by 90% from 11,533 kg CO₂e annually to 422kg CO₂e annually. In this scenario the only emissions associated with operating the electric vehicle come from the manufacturing of the vehicle. It would of course be impractical and unrealistic to require delivery drivers to charge electric vans at home, demonstrating the necessity for a dedicated storage location for the vans to provide the required supporting charging facilities.

- 3.6 Furthermore, the storage facility allows the operator to control the standard of delivery vans that serve the site during the transition to a 100% EV fleet by working towards all vans being Euro 6 compliant vans prior to achieving the 100% EV fleet.
- 3.7 Another benefit of the proposed development is modal shift. At present all of the drivers have to drive to the site in their own vans, with no ability to travel by sustainable modes or trip share. The van storage facility will change this, which is both sustainable and also widens access to the job opportunities for people that would like jobs as drivers but may not be able to access a suitable van.
- 3.8 Another planning benefit from the dedicated van storage site is that this substantially reduces the requirement for drivers to store vans overnight local to where they live. A high proportion of the drivers are unlikely to be able to store the vans on drive-ways, therefore the vans are stored on public roads near to the homes of the drivers.
- 3.9 Finally, the dedicated van storage site can serve to reduce the number and duration of trips. The business can enhance the route that the drivers take from this single starting point, allowing more parcels to be delivered per launch of the vehicle. As is clear from the Transport Statement, the proposed development does not materially impact the throughput of the distribution warehouse therefore there is no increase in vehicles on the local road network. On the contrary, the proposals represent a betterment in terms of trips.
- 3.10 Local drivers would arrive at the Site by various means of transport, collect a van and leave the Site to make their deliveries. Once all deliveries have been made, drivers would return the vans to the Site, collect their own vehicles (if they have driven to the Site), or travel home by other means of transport. Full details of the proposed operation of the van storage facility are contained within the supporting Transport Statement prepared by Vectos.
- 3.11 The proposed development includes the provision of associated parking, access alterations, guard hut, welfare block, cycle shelter, smoking shelter, landscaping, and associated development and infrastructure.

3.12 Vehicular access will be provided via the existing access point located off Anderson Way, with some minor modifications required to the existing access junction. Safe and legible pedestrian links are proposed from Anderson Way into the Site, and between the van storage bays and onsite ancillary features. Secure, covered cycle parking is proposed, along with motorcycle parking bays. Further details are provided in the accompanying Design and Access Statement and Transport Statement, and shown on the Plans prepared by SMR.

4.0 PLANNING POLICY CONSIDERATIONS

- 4.1 This section sets out the national and local planning policies relevant to the proposals that seek to achieve sustainable development, build a strong, competitive economy, achieve good design, conserve and enhance the natural environment, promote safe and sustainable transport, and meet the challenge of climate change and flooding.
- 4.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, if regard is to be had to the development plan for the purpose of determining planning applications, then determination must be made in accordance with the development plan, unless material considerations indicate otherwise.
- 4.3 The statutory development plan for the area for the purpose of this application comprises the London Plan (2021), Bexley Core Strategy (2012), and the Bexley Unitary Development Plan ‘Saved’ Policies (2007).
- 4.4 Paragraph 48 of the NPPF advises that local planning authorities may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to relevant policies, and the degree of consistency of the emerging policies with the NPPF. In this instance, the proposed development has been assessed against relevant policies the Bexley Emerging Local Plan which is currently at the Preferred Approach Regulation 18 consultation stage. Adoption is scheduled for late 2021.

National Planning Policy Framework

Achieving Sustainable Development

- 4.5 The NPPF sets out the Government’s planning policies for England and how they should be applied. It specifies that the purpose of the planning system is to contribute to the achievement of sustainable development through 3 overarching objectives, which should be delivered through the preparation and implementation of plans and the application of the NPPF policies:
- An economic role – to ensure a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places to support growth, innovation and improved productivity;
 - A social role – to support strong, vibrant and healthy communities by fostering a well-designed and safe built environment; and,
 - An environmental role – making effective use of land and contributing to protecting and enhancing the natural, built and historic environment (paragraph 8).

- At the heart of the NPPF is a presumption in favour of sustainable development, which should be applied by approving development proposals that accord with an up-to-date development plan without delay (paragraph 11c).
- Where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, permission should be granted unless there is a clear reason for refusing the proposal (based on NPPF policies that protect areas of assets of particular importance), or any adverse impacts of doing so would significantly or demonstrably outweigh the benefits, when assessed against the NPPF taken as a whole (paragraph 11d).

Building a Strong and Competitive Economy

- 4.6 The NPPF sets out the Government's commitment to creating 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 local business needs (paragraph 80).
- 4.7 Local planning authorities are required to make provision for storage and distribution operators at variety of scales and in suitably accessible locations (paragraph 82).

Promoting Sustainable Transport

- 4.8 Paragraph 102 requires the environmental impacts of traffic and transport infrastructure to be identified, assessed and taken into account. Significant development should be focused on locations which are, or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (paragraph 103).
- 4.9 In addition, it should be ensured that safe and suitable access can be achieved for all users (paragraph 108). Developments should create places that are safe, secure and attractive, and respond to local character and design standards (paragraph 110).
- 4.10 With regard to distribution centres, the NPPF specifically requires that proposals should make provision for sufficient parking to cater for their anticipated use (paragraph 107). Although reference in this paragraph is made to lorry parking, it is considered to be applicable to all operational parking requirements for distribution centres.

Making Effective Use of Land

- 4.11 Local planning authorities are required to promote an effective use of land in meeting the need for various uses, while safeguarding and improving the environment (paragraph 117). Substantial

weight is to be given to the value of using suitable brownfield land within settlements, and the development of under-utilised land should be promoted and supported (paragraph 118).

Achieving Well-Designed Places

4.12 Developments are required to be sympathetic to local character, including the surrounding built environment, while not preventing or discouraging appropriate innovation or change, and should optimise the potential of the site to accommodate and sustain an appropriate amount of development, and support local transport networks (paragraph 127).

4.13 In determining applications, the NPPF advises that great weight should be given to innovative designs that promote high levels of sustainability, so long as they fit in with the overall form and layout of their surroundings (paragraph 131).

Meeting the Challenge of Climate Change and Flooding

4.14 The planning system is required to support the transition to a low carbon future, taking full account of flood risk, by helping to shape places in ways that contribute to reducing greenhouse gas emissions, encourage the reuse of existing resources, including the conversion of existing buildings and support renewable and low carbon energy and associated infrastructure (paragraph 148). New development should be planned for in ways that can help reduce greenhouse gas emissions through location, orientation and design (paragraph 150). The NPPF also requires development to be directed away from areas at highest existing or future risk of flooding (paragraph 155). Where appropriate, planning applications should be supported by a site-specific flood-risk assessment (paragraph 163). Footnote 50 specifies that such an assessment is required for all development in Flood Zones 2 and 3.

Conserving and Enhancing the Natural Environment

4.15 The NPPF states that the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity, and preventing new development from contributing to unacceptable levels of pollution (paragraph 170).

4.16 Paragraph 178 requires planning decisions to ensure that sites are suitable for the proposed use, taking account of ground conditions and any risks arising from land instability and contamination.

Adopted Development Plan Policies

The London Plan (2021)

4.17 Policy D14 (Noise) – In order to reduce, manage and mitigate noise to improve health and quality of life, non-aviation development proposals should manage noise by (amongst other measures) avoiding significant adverse noise impacts on health and quality of life, where it is not possible to

achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles, and promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

- 4.18 Policy E4 (Land for industry, logistics and services to support London’s economic function) – A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained. The retention, enhancement and provision of additional industrial capacity should be planned, monitored and managed. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution. The retention, enhancement and provision of additional industrial capacity should be prioritised in locations that (amongst others) are accessible to the strategic road network, provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London’s economy and population, and are suitable for ‘last mile’ distribution services to support largescale residential or mixed-use developments subject to existing provision.
- 4.19 Policy E5 (Strategic Industrial Location (SIL) – The Site is located within a SIL in the London Plan (2021) where in accordance with this policy development proposals for (among other uses) light and general industrial (B1c and B2) and storage and distribution (B8) should be supported.
- 4.20 Policy E7 (Industrial Intensification, co-location and substitution) – This policy provides support for the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land.
- 4.21 Policy SI1 (Improving air quality) – Development proposals should not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits, create unacceptable risk of high levels of exposure to poor air quality.
- 4.22 Policy SI13 (Sustainable Drainage) – Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features in accordance with the specified drainage hierarchy. Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and

driveways. Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

4.23 Policy T4 (Assessing and mitigating transport impacts) – Development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network are fully assessed. Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified. Development proposals should not increase road danger.

[Bexley Unitary Development Plan 'Saved' Policies \(2007\)](#)

4.24 **Policy E1** – Proposals for industrial uses will be resisted unless the following conditions are met: no material adverse effects on the health; safety or amenities of residential areas or neighbouring properties; satisfactory design layout and scale; adequate vehicle parking provisions and manoeuvring space; provision of appropriate landscaping; and, the need for safeguards against discharges from the development that could lead to the build-up of high levels of pollution.

4.25 **Policy E3** – The Council will encourage industrial and commercial uses to locate in the Primary Employment Areas shown on the Proposals Map in accordance with the area policies set out in this chapter and Chapter 12 (Thames-side). Land and buildings in the Primary Employment Areas will be safeguarded for industrial and commercial uses as appropriate to each area.

4.26 **Policy TS1** states that subject to Policies E1 and E13, the Council will encourage development for business, general industry and storage and distribution purposes (as defined by paragraph 7.5) in the following locations (Sites A on the Proposals Map):

- Eastern Industrial Estate, Thamesmead
- Norman Road/Picardy Manorway, Belvedere
- Land east of Picardy Manorway, Belvedere
- Land west of Crabtree Manorway North, Belvedere

4.27 **Policy ENV35** – The Council will seek the protection and long term retention of trees of amenity, nature or landscape conservation value on development sites or elsewhere where they might be at

risk and, in appropriate cases, will require new tree and hedge planting as part of a landscaping scheme for development proposals.

- 4.28 **Policy ENV39** – In order to protect and enhance the quality of the built environment, the Council will seek to ensure that all new developments, including alterations and extensions, changes of use and other operations, including highway improvements, are satisfactorily located and are of a high standard of design and layout.
- 4.29 **Policy ENV40** – In accordance with policies G34 and ENV39, the Council will require applicants to survey sites that are known or suspected to be contaminated to determine the source of any pollutants and any remedial measures necessary to prevent these causing hazards either during construction or through subsequent use of the site.
- 4.30 **Policy ENV41** – The Council will have regard to national and local Air Quality Strategies in seeking to ensure that proposals for development do not compromise air quality objectives. The Council will require an applicant to prepare an Air Quality Assessment where proposals are located in (or are likely to effect) an Air Quality Management Area, which would significantly change the pattern of traffic flows or could lead to emissions of one or more of the pollutants specified in the national Air Quality Strategy.
- 4.31 **Design and Development Control Guideline 8 (Industrial and Commercial Development)** – This sets out that vehicle parking to meet current standards should be provided; turning and manoeuvring space should be provided sufficient to manoeuvre a 15 m articulated lorry within the curtilage; storage of alcohol, oil, pollutants and soon should be banded to control spills and that Controls will be imposed requiring planting and landscaping to soften the visual impact of the development.
- [Bexley Core Strategy \(2012\)](#)
- 4.32 **Policy CS01 (Achieving Sustainable Development)** – Developers will be required to (among other criteria) maximise the effective and efficient use of natural and physical resources including land, water and energy, whilst addressing pollution issues, such as noise and air quality to contribute to the health and wellbeing of the community and the environment.
- 4.33 **Policy CS08 (Adapting to and mitigating the effects of climate change, including flood risk management)** – All development should contribute to the delivery of sustainable development by planning for, adapting to, and mitigating the impacts of climate change, by reducing the carbon emissions related to the construction and operation of all development. The Council will achieve this by applying the requirements and targets outlined in national and regional planning policy and

guidance to new development, including (amongst others) sustainable transport (in particular public transport, cycling and walking); green infrastructure; flood risk management; and sustainable urban drainage systems (SUDS).

- 4.34 **Policy CS09 (Using Bexley's Resources Sustainably)** – Development that seeks to maximise the effective and efficient use of natural and physical resources, while contributing to the health and wellbeing of the community and the environment, will be encouraged. The Council will do this by applying the requirements outlined in national and regional planning policy and guidance to new development, in particular the requirements of the Mayor's London Plan with regard to (among other criteria) air and water quality.
- 4.35 **Policy CS12 (Bexley's future economic contribution)** states that Bexley will safeguard existing employment land and identify in future policy documents, such as a development plan document that deals with detailed sites and policies, the 43 to 50 hectares of employment land that the Council will consider for a sensitively managed transfer to other sustainable uses. Bexley will also promote Belvedere Employment Area and Bexleyheath town centre as the borough's principal locations for employment.
- 4.36 **Policy CS15 (Achieving and integrated and sustainable transport system)** – The Council will work to achieve a comprehensive, high quality, safe, integrated and sustainable transport system which makes the most of existing and proposed transport infrastructure within the borough and seeks to ensure a much improved and expanded role for public transport.
- 4.37 **Policy CS16 (Reducing the need to travel and the impact of travel)** – The Council will seek to minimise the need for and distances people travel, thereby reducing the time, cost and environmental effects of transportation and improving accessibility and quality of life for Bexley residents, through measures including ensuring developments are equipped to benefit from new technology, and promoting travel awareness campaigns, workplace travel plans, area based travel plans and car clubs.
- 4.38 **Policy CS18 (Biodiversity and geology)** – The Council will protect and enhance its biodiversity and geological assets, whilst complying with national and regional policy and guidance, through measures including (amongst others) protecting and enhancing the natural habitat as far as practicable, seeking biodiversity enhancements and improved access to nature, particularly in areas of deficiency.

Draft Development Plan Policies

Bexley Emerging Local Plan – Regulation 18 Consultation (February 2019)

- 4.39 The Bexley Emerging Local Plan is currently at the Preferred Approach Regulation 18 consultation stage and as such there are no draft policies established yet. However, the preferred strategic policy approach relating to employment uses and delivering sustainable communities are set out below.
- 4.40 **Policy SP1 (Placemaking)** – Sustainable development is synonymous with good growth, ensuring places work economically, socially, and environmentally in the long. These principles are basic concepts of land use planning and will be secured through the creation of (amongst others) high quality, sustainable employment areas in accessible locations offering a range of high quality jobs; and, high quality environments with safe and pleasant open spaces, well designed buildings and an outstanding cultural and heritage offer.
- 4.41 **Policy SP2 (Sustainable growth)** – All new proposals for development must conform with the following principles of securing sustainable growth in Bexley, where appropriate: Strengthen and diversify the local economy; Protect and enhance the natural and built environment; and, Create high quality, safe and well-connected healthy lifetime communities.
- 4.42 **Policy SP4 (Employment growth, innovation and enterprise)** – The Council will promote sustained economic development and employment growth by protecting designated strategic industrial locations (SIL), as defined in the policies map, for industrial type activities set out in policy DP6, protecting designated locally significant industrial sites (LSIS), as defined in the policies map, for industrial and related functions set out in policy DP6, and seeking to secure development proposals that enhance and better integrate transport accessibility between Bexley’s housing and employment locations. The Council will also aim to ensure that residents of all abilities are provided with opportunities to access training and a variety of local jobs and enable local businesses to draw upon a wide range of skilled workers and employment premises

Summary

- 4.1 The key planning policy issues relating to this site are considered to be:
- The principle of development;
 - The impacts on the local transport network and promoting sustainable travel;
 - The design and layout of the proposed development; and
 - The impact of the development on the amenity of the local area.

5.0 POLICY COMPLIANCE

Achieving Sustainable Development

- 5.1 The proposed scheme represents sustainable economic development on the basis that it would allow the occupier to operate an efficient last mile delivery station serving the local area from a site which is allocated for employment uses in the adopted Development Plan. The proposal makes effective use of previously developed land.
- 5.2 The land take associated with storing the fleet of delivery vans has been minimised through the design of the decked storage area, which enables the occupier to operate within the confines of this brownfield site without impacting on the natural or built environment in the vicinity.
- 5.3 Sustainable development is achieved through the collaboration of a number of key requirements. As such, compliance with the above overarching policies requiring sustainable development is set out below.

Building a Strong and Competitive Economy

- 5.4 The proposed development is required to enable the proposed last mile distribution centre to operate efficiently and successfully from the site, which should be afforded significant weight in accordance with national planning policy.
- 5.5 The proposed development includes the demolition of the exiting warehouse which was previously occupied by Jablite for a period of 5 years until August 2020. Jablite is a leading UK manufacturer and supplier of expanded polystyrene products for insulation and manufacture insulation products for roofs, walls and floors. The existing unit has been specially adapted overtime and is now a bespoke Site only fit for the operations of the last known user. The Site cannot therefore be easily adapted or altered to suit a different end user and as such a full redevelopment of the Site for industrial purposes is required. As a result, the applicant is proposing to redevelop this brownfield Site for a B8 Use (storage and distribution) which is essential in order to support the existing distribution warehouse on Crabtree Manor Way and will ensure the Site remains in occupation for a suitable industrial use after being inactive and vacant for a period of time.
- 5.6 As discussed above, the principle of the redevelopment of this brownfield site is considered acceptable. The Site forms part of the Belvedere Industrial Estate which is an identified Primary Employment Area where industrial and commercial uses are encouraged, including Class B8, within the Saved Unitary Development Plan. This is further supported by London Plan Policy E5 which supports industrial type activities in SILs, with the Site forming part of the Belvedere Industrial Area

SIL. In SILs development proposals for (amongst other uses) light and general industrial (B1c and B2) and storage and distribution (B8) should be supported in accordance with Policy E4 Part A.

- 5.7 The ancillary vehicle storage area is required to support the local distribution centre on Crabtree Manor Way. Without the vehicle storage facility the occupier of the centre would no longer be able to operate out of this facility due to the need to meet long term sustainability aspirations around its fleet of vehicles. As such, this development should be viewed as one which ensures the retention of current jobs which would be consistent with the employment needs in Core Strategy Policy CS12.
- 5.8 Furthermore, the Site is also surrounded by existing industrial uses within Belvedere Industrial Estate and in terms of paragraph 82 of the NPPF, is in a suitably accessible location for the proposed development which will support an existing storage and distribution operation.
- 5.9 In light of the above, the proposed development is compliant with national, regional and local planning policy seeking to secure sustainable economic growth and productivity.

Promoting Sustainable Transport

- 5.10 The proposed van storage area forms part of the servicing infrastructure and operational requirements for the last mile delivery centre off Crabtree Manorway North, and is therefore supported by local, regional and national planning policy.
- 5.11 The van storage area has been designed to complement the industrial nature of the site and its surrounding area, and reflects the prevailing scale of built development in the area. The use of a decked storage area is considered to be a more attractive solution, compared to an at-grade, off-site facility that would require a greater footprint to accommodate the required number of vehicles.
- 5.12 Vectos have been appointed to produce a Transport Statement to consider the impacts of the proposals on the local highway network, which has been submitted in support of the current application. The Transport Statement states that the proposed development will result in the redistribution of existing traffic associated with the adjacent distribution centre. In this regard, it will not have any adverse effects upon the operation of the local highway network. On the contrary, it is expected that the scheme will result in less vehicle activity given workers will be able to travel by a choice of modes moving forward as oppose to having to travel by car/van at present. In conclusion, the proposed development would not give rise to any severe transport impacts.
- 5.13 The application site is accessible by a various means of transport. As well as being accessible by car from Anderson Way (providing access to the A2016), the site is accessible by bus with bus stops located less than 100m from the access point to the Site, and Belvedere train station located

approximately 650m from the Site. Cycle parking is proposed as part of the development allowing employees to cycle work and store their bicycles safely.

- 5.14 In light of the above, the site is demonstrated to be accessible and the proposals would allow for sustainable transport movements both by staff and delivery drivers. The proposals include 20% active provision for EV charging and the remaining 80% passive provision with the infrastructure in place on Site but not yet active. The proposed decked van storage area, which forms part of the servicing infrastructure for the local distribution centre, would result in a reduced vehicle trip rate, as required by planning policy. The proposal is, therefore, considered to comply with national, regional and local planning policy seeking to promote sustainable transport.

Making Effective Use of Land

- 5.15 As discussed above, the proposals make the most efficient use of the existing brownfield site to a use which is appropriate to its industrial/logistics setting.
- 5.16 The van storage area has been designed to complement the industrial nature of the site and its surrounding area, and reflects the prevailing scale of built development in the area. The use of a decked storage area is considered to be a more attractive solution, compared to an at-grade, off-site facility that would require a greater footprint to accommodate the required number of vehicles, and would not represent an efficient use of land in the borough.
- 5.17 In light of the above matters, the proposals are considered to comply with national, regional and local planning policies concerning the effective use of land.

Achieving Well-Designed Places

- 5.18 As set out above, the van storage area has been designed to complement the industrial nature of the Site and its surrounding area, and makes use of materials and finishes that match the surrounding area. The layout of the proposal has been efficiently designed to ensure that a sufficient number of storage bays are provided to support the distribution centre, whilst providing safe access for vehicles and pedestrians.
- 5.19 The extensive existing vegetation that surrounds much of the Site will ensure the proposed development is mostly screened from viewpoints along Anderson Way and the wider surrounding environment. A detailed Landscaping Plan prepared by Urban Wilderness has been submitted with this planning application that shows enhanced landscaping at the Site including hedgerow planting, wildflower planting and maintenance of existing woodland, which will further enhance the

appearance of the Site in its context on wider Belvedere Industrial Estate and makes a contribution towards the Local Plan objectives of providing green infrastructure.

- 5.20 The Site forms part of an established industrial area with few sensitive receptors in the vicinity. The Noise Impact Assessment submitted with the application demonstrates that the operational noise levels at the Site will meet the typical background sound levels and the level of noise generated by the Site at the closest residential dwelling to the south west will result in a negligible noise impact
- 5.21 With regards to the external lighting proposed, a drawing of the proposed lighting scheme, showing the details of the proposed lighting infrastructure and the associated lux levels, has been submitted with the application which demonstrates there will be no adverse impact on these properties or local amenity in terms of lighting.
- 5.22 In light of the above matters, the proposal is considered to comply with national, regional and local planning policies seeking to achieve well-designed places.

Meeting the Challenge of Climate Change and Flooding

- 5.23 The Site is located within Flood Zone 3 (high probability of flooding) with flood defences. Consequently, in support of this application a Flood Risk Assessment and Drainage Strategy has been prepared by Eireng.
- 5.24 The Flood Risk Assessment demonstrates that the flood risk at the Site can be mitigated to a negligible or low and acceptable level through mitigation measures. The proposed use is classified as less vulnerable and these uses are considered acceptable in terms of flood risk in Flood Zone 3a where the Site is located. Subject to the implementation of the mitigation measures set out in the assessment, the Sequential Test would be passed, and the Exceptions Test would not be required.
- 5.25 This Flood Risk Assessment demonstrates that the proposed development would be operated with minimal risk from flooding, would not increase flood risk elsewhere and is compliant with the requirements of national and local policy and guidance. The development should therefore not be precluded on the grounds of flood risk or surface water and foul drainage.
- 5.26 Accordingly, the proposed development would be operated with minimal risk from flooding and would not increase flood risk elsewhere.
- 5.27 On this basis, it has been demonstrated that the proposal would not lead to harm to the quality of groundwater from surface or foul water, and would not cause or aggravate flooding in accordance with national and local planning policies and guidance.

5.28 A Sustainability and Energy Statement has been prepared by Envision to support this planning application. The Statement demonstrates how the development seeks to mitigate carbon emissions, which is facilitated by the proposals to consolidate and electrify fleet operations from the existing operations at Crabtree Manorway North, alongside wider proposals for energy and resource efficiency.

Conserving and Enhancing the Natural Environment

5.29 The Site and entire borough are designated as an Air Quality Assessment Area. UDP Saved Policy ENV41 requires applicants to prepare and Air Quality Assessment where proposals are located in (or likely to effect) and Air Quality Management Area. Thereby, an Air Quality Assessment (AQA) has been prepared by Delta Simons in support of this application. The assessment concludes that the effects of the development on air quality are not significant and it is considered that the Proposed Development complies with national and local policy for air quality, and air quality issues are not considered a constraint to planning consent.

5.30 An Arboricultural Impact Assessment/Arboricultural Method Statement has been submitted in support of this application (prepared by Delta Simons) and sets out that there are groups of Category B and C trees across the Site which are all proposed for retention. The trees will be adequately protected during any approved development works

5.31 The Site itself is surrounded by deciduous woodland and broadleaved woodland around the perimeter of the Site. The Site is also in close proximity to a Network Enhancement Zone, located to the west, and Open Mosaic Habitat to the north. Policy CS18 highlights that the Council will seek to protect and enhance the natural habitat as far as practicable, seeking biodiversity enhancements and improved access to nature. An Ecology Survey has therefore been provided by Delta Simons in support of this application and recommends the following measures to ensure any identified habitats or species are adequately protected:

- Any Site clearance / demolition works of potential bird nesting habitat should be performed either before early March or after late August in order to avoid the main bird nesting season;
- The detailed lighting design on Site should be functional and directional and in line with current guidance;
- It is recommended that no excavations or trenches are left uncovered overnight during the development works in order to prevent any mammals from becoming trapped. Alternatively, ramps can be provided to enable them to climb out of trenches or excavations;

- All works on Site should follow an appropriate working methodology to avoid inadvertent damage to any habitats and associated fauna retained on, or surrounding, the Site; and
- Additional planting has been proposed within the Landscaping Scheme prepared by Urban Wilderness.

5.32 A Preliminary Geo-Environmental Risk Assessment in relation to land contamination has also been submitted in support of this application (prepared by Delta Simons). The desk based assessment concludes that further site investigations are recommended to assess the risks posed by ground gas and to the deeper groundwater. This work is ongoing and the applicant is aiming to submit the details of these investigations as soon as possible.

5.33 In light of the above, it is considered that the proposed development complies with national and local policies seeking to conserve and enhance the natural environment.

Conserving and Enhancing the Historic Environment

5.34 There are no heritage assets on the Site or in the immediate surrounding area. The nearest heritage asset is circa 1,500m to the south-east comprising Parish Church of St John the Baptist (Grade II).

5.35 In light of the above, the proposed development would not result in any impact on non-designated or designated heritage assets and is considered to comply with national and local planning policies concerned with conserving and enhancing the historic environment.

6.0 PLANNING BENEFITS

- 6.1 The proposed installation of a van storage facility on Anderson Way would result in a number of planning benefits, as well as being an optimal solution to meet the business needs of the identified occupier.
- 6.2 As discussed above, and within the accompanying Transport Statement, the proposed development would improve operational efficiencies and will assist the prospective occupier to achieve its objectives relating to reducing emissions.
- 6.3 The proposals involve the use of a fleet of delivery vans to be managed by the operator, which would comprise more modern, efficient, well-maintained vehicles. This would result in environmental benefits particularly to air quality.
- 6.4 In terms of landscaping, a scheme has been prepared by Urban Wilderness that shows enhanced landscaping at the Site including hedgerow planting, wildflower planting and maintenance of existing woodland, which will further enhance the appearance of the Site in its context on wider Belvedere Industrial Estate and makes a contribution towards the Local Plan objectives of providing green infrastructure.
- 6.5 In terms of biodiversity, the ecology survey produced by Delta Simons demonstrates that the proposed development will not result in any adverse impacts on the ecological network at the Site and surrounding area and the landscaping proposed will seek to enhance the biodiversity in and around the Site.
- 6.6 In terms of economic benefits, the proposals would provide employment opportunities for those wishing to take up delivery driver jobs, but who are unable to afford to purchase or hire their own vehicle. It would also ensure the retention of jobs within Bexley associated with the ancillary local distribution centre.
- 6.7 Overall, the proposed development represents an opportunity to make efficient use of this existing employment in such a way that provides a variety of economic, social and environmental benefits.

7.0 CONCLUSION

- 7.1 The Site at Anderson Way, Belvedere, comprises of a rectangular shaped plot of land providing existing industrial buildings, an office building an external yard used for storing materials and Heavy Goods Vehicles (HGVs), and a car parking area.
- 7.2 The proposals, the subject of this planning application, are required to provide a secure van storage facility close to the existing distribution facility.
- 7.3 All key planning considerations have been taken into account in the preparation of the development proposals, which comply with national, regional and local Development Plan policies.
- 7.4 In summary, these proposals represent sustainable development, securing an employment generating economic use of a currently vacant site. It would result in improvements to economic productivity without negatively impacting on highway capacity, highway safety, biodiversity, arboricultural, noise levels, flood risk, air quality, heritage or amenity interests.
- 7.5 The development has been demonstrated to be compliant with the Development Plan and, therefore, warrants support from the Local Planning Authority.