



ADM Erith: Thermal Oxidiser and Associated Infrastructure

Planning and Design Statement

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Planning and Design Statement



David Pollok
Partner

Environmental Resources Management Limited

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Acronyms and Abbreviations

Name	Description
ADM	Archer Daniels Midland Erith Limited
EA	Environment Agency
EP	Environmental Permit
ERM	Environmental Resources Management Ltd
FWMA	Flood and Water Management Act 2010
HGV	Heavy Goods Vehicle
LB	London Borough
LLFA	Lead Local Flood Authority
LNR	Local Nature Reserve
LPA	Local Planning Authority
NPPF	National Planning Policy Framework
SAC	Special Area of Conservation
SINC	Site of Interest for Nature Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Drainage Systems
TCPA	Town and Country Planning Act 1990
TO	Thermal Oxidiser
UDP	Unitary Development Plan

1. SUMMARY

Archer Daniels Midland Erith Limited (ADM) is seeking planning permission under the Town and Country Planning Act 1990 (TCPA) from the London Borough (LB) of Bexley to undertake external alterations to an existing building to allow for the installation of new plant (new thermal oxidiser, caustic scrubber, caustic tank and high sulphate buffer tank), the erection of a new stack and ducting connecting to the building and a new water buffer tank (the Proposed Development) at ADM's existing facility at Church Manorway, Erith, DA8 1DL.

The objective of the Proposed Development is to improve the abatement of emissions to air from ADM's Erith operations and to therefore improve air quality for the benefit of local health and the environment and for reduction of odour.

The purpose of this Planning and Design Statement (the Statement) is to clearly set out the case for the Proposed Development having regard to the provisions of local, regional and national policy and other material considerations.

The Statement concludes that the Proposed Development meets policy objectives and delivers sustainable development. The Proposed Development is considered to be appropriate to its location and meets the objectives established within the National Planning Policy Framework (NPPF), the London Plan and Local Development Plan policies and by its nature and scale is acceptable development in the context of the site and surrounding industrial area.

Furthermore, no significant negative impacts or effects are predicted on the surrounding area as a result of the Proposed Development in respect of:

- Air Quality;
- Ecology and Biodiversity;
- Landscape and Visual;
- Cultural Heritage;
- Traffic and Transport;
- Noise; and
- Flood Risk.

In summary, the Proposed Development:

- is deemed to be appropriate development in the context of its setting, scale and existing land uses;
- complies with national, regional and local planning policies; and
- will have no significant adverse environmental impacts and delivers sustainable development.

2. INTRODUCTION

This Statement has been prepared by Environmental Resources Management Ltd (ERM) on behalf of ADM. It accompanies an application under the Town and Country Planning Act 1990 to the LB Bexley to undertake external alterations to an existing building to allow for the installation of new plant (new thermal oxidiser, caustic scrubber, caustic tank and high sulphate buffer tank), the erection of a new stack and ducting connecting to the building and a new water buffer tank.

2.1 Background

ADM refines rapeseed oil from rapeseed and unrefined rapeseed oil and imports sunflower oil. The plant crushes rapeseed and refines the crude oil produced. During the rapeseed extraction process Hydrogen Sulphide (H₂S) gases are produced from the mineral oil system. These gases are treated before sending them to atmosphere via a thermal oxidizer (TO) where H₂S is transformed into sulphur dioxide (SO₂).

The need for a new thermal oxidiser (TO) and associated infrastructure has been agreed with the Environment Agency (EA) in order to reduce the emissions to atmosphere so that potential impacts to ambient air quality and potential odour nuisance are reduced to acceptable levels.

The Erith facility is operated under an existing Environmental Permit (EP). A variation to the EP will be required for the Proposed Development under the Environmental Permitting (England and Wales) Regulations 2016 prior to the operation of the Proposed Development. This has been prepared in parallel to the planning application and was submitted to the EA on 21 June 2021.

The EA is the relevant competent authority in respect of the EP variation.

In order to facilitate the Proposed Development an existing chimney stack will be demolished. An application for Prior approval for the demolition of the existing chimney (21/01253/PRIORD) was approved by LB Bexley on 14 May 2021.

2.2 Report Structure

The purpose of the Planning and Design Statement is to set out the policy case for the Proposed Development having regard to the provisions of local, regional and national policy and other material considerations. It is structured as follows:

- Section 3 describes the planning application site in terms of its physical context and planning history;
- Section 4 provides details of the Proposed Development;
- Section 5 provides details of the management of the construction process;
- Section 6 sets out the environmental site context and considerations;
- Section 7 sets out the planning policy context for the development; and assesses the Proposed Development against policy considerations; and
- Section 8 provides conclusions.

Appendix A contains the Planning and Design Statement Report.

The planning application is accompanied by the following planning drawings:

- Planning Drawing FP-21-ADM-001 - Site Location Plan;
- Planning Drawing FP-21-ADM-002 - Site Context Plan;
- Planning Drawing 29056-100-ADM – Existing Layout;
- Planning Drawing 29056-101-ADM – Existing Block Plan;

- Planning Drawing 29056-102-ADM – Existing North and East Elevations;
- Planning Drawing 29056-103-ADM – Existing South and West Elevations;
- Planning Drawing 29056-104-ADM – Existing Floor Plan;
- Planning Drawing 29056-105-ADM – Existing Roof Plan;
- Planning Drawing 29056-106-ADM – Intermediate South and West Elevations;
- Planning Drawing 29056-107-ADM – Intermediate North Elevation;
- Planning Drawing 29056-108-ADM – Intermediate East Elevation;
- Planning Drawing TZ2-GEN-LAY - Final Proposed Layout Plan;
- Planning Drawing 29056-109-ADM – Final Proposed South and West Elevations;
- Planning Drawing 29056-110-ADM – Final Proposed East Elevation;
- Planning Drawing 29056-111-ADM – Final Proposed North Elevation;
- Planning Drawing 29056-112-ADM – Final Proposed Floor Plan;
- Planning Drawing 29056-113-ADM – Final Proposed Roof Plan;
- Planning Drawing 29056-114-ADM-ERITH Existing Cross Sections;
- Planning Drawing 29056-115-ADM-ERITH Final Proposed Cross Sections;
- Planning Drawing 29056-700-ADM – Existing 3D Visualisation;
- Planning Drawing 29056-501-ADM - Photo Collage-West Elevation;
- Planning Drawing 29056-502-ADM - Photo Collage-East Elevation;
- Planning Drawing 29056-503-ADM - Photo Collage-North Elevation; and
- Planning Drawing FP-21-ADM-003 – Site Drainage Plan.

3. THE APPLICATION SITE

3.1 The Site

The Proposed Development is located within the existing ADM site in the Belvedere Industrial Area on Erith Riverside. The ADM site is situated on Church Manorway in Erith, DA8 1DL. The extent of ADM's existing site is shown on drawing FP-21-ADM-002 Site Context Plan, covering an area of 7.5ha. The majority of the site is covered with buildings and industrial infrastructure.

The planning application site (see drawing FP-21-ADM-001 Site Location Plan) covers an area of 0.12ha within the wider ADM site.

3.1.1 Current Site Use

ADM processes rapeseed to produce rapeseed oil and rape meal for feedstuffs with a throughput capacity of 1.4mt per annum. Sunflower oil is delivered and stored on site to be processed at a separate ADM facility.

3.2 Site Context

The site is located within the wider Belvedere Industrial Area which comprises a mix of warehousing, distribution and industrial buildings and plant. Immediately to the north of the site is a Tesco distribution centre. The River Thames forms the eastern site boundary. To the immediate south of the site are industrial businesses with residential development beyond. The nearest residential area is approximately 400m to the southwest of the site boundary beyond the A2016 and a main line railway (see drawing FP-21-ADM-002 - Site Context Plan).

3.3 Planning and Permitting History

There have been numerous applications for planning permission on the site as a whole since it has been owned and operated by ADM. None have any direct relevance to this planning application. There are no recent planning applications or permissions (in the last five years) within the site boundary except for the Prior Approval for the demolition of the existing chimney stack in May 2021 (21/01253/PRIORD).

ADM currently operates the Erith Oil Works under Environmental Permit reference QP3331PQ, issued on 21st December 2005. A variation to the EP has been prepared in parallel to the planning application and was submitted to the EA on 21 June 2021.

4. THE PROPOSED DEVELOPMENT

4.1 Outline of the Development

The Proposed Development consists of the external alterations to an existing building to allow for the installation of new plant (new thermal oxidiser, caustic scrubber, caustic tank and high sulphate buffer tank), the erection of a new stack and ducting connecting to the building and a new water buffer tank.

As part of the process, Sodium Hydroxide will be used to neutralise acid gases in the gas stream. A new 'day' tank, with a capacity of two tonnes, is being provided as part of the Proposed Development which will draw Sodium Hydroxide from the existing main storage tank on site, as required. There will be no material increase in the amount of Sodium Hydroxide stored or used on the ADM site.

Enabling works consist of the removal of a redundant concrete support structure and bund of a former sulphuric acid tank to enable the construction of the base for the new stack.

4.2 Character

4.2.1 Design

The driving factor for the design of the Proposed Development is to improve the efficiency and reliability of abatement of emissions to air from the ADM Erith operation so as to reduce the potential for effects on human health and the environment and to reduce odour. The need for this improvement has been agreed with the EA.

4.2.2 Layout

The Proposed Development is located entirely within the landholding of ADM as shown on drawing FP-21-ADM-001 - Site Location Plan.

The layout of the development has been determined by the need to meet operational, functional and health and safety requirements (drawing TZ2-GEN-LAY - Final Proposed Layout Plan), working within existing site constraints, and is concentrated in the northern part of the site.

The new TO, housed in the existing boiler building, is deliberately distanced from the existing extraction plant and grain silos which house a large quantity of flammable materials. This has influenced the location of the associated plant and infrastructure. The optimum location for the caustic scrubber is adjacent to the TO. The new stack is located close to the caustic scrubber immediately outside the boiler house. The new water buffer tank is too large to go into the boiler house, but is located in the immediate vicinity.

The layout is acceptable in both operational design and planning terms.

4.2.3 Scale

4.2.3.1 Boiler House

The alterations to the existing boiler house do not increase the overall scale of the existing building. The current roof line and height will be retained. A new fire escape from the ground floor, as shown on drawing 29056-112-ADM – Final Proposed Floor Plan, will be an open steel framed staircase of 2.00m by 1.25m with a hand rail and will have a negligible impact on the overall mass of the building.

The dimensions of the elements of the external alterations to the boiler house are found on planning drawings 29056-110-ADM – Final Proposed East Elevation, 29056-111-ADM – Final Proposed North Elevation and 29056-109-ADM – Final Proposed South and West Elevations.

4.2.3.2 Stack and Ducting

The top of the stack will be 47.9m. The stack itself will be 46.9m high above the finished floor level with a diameter of 1.3m. The new stack will be mounted on a concrete base of 2.2m by 2.2m and 0.3m high. The stack has access ladders and platforms on the western side. The platform is at a height of 13.3m above the finished floor level.

The new stack is connected to the boiler house by 17.1m of ducting. The ducting is 10.2 m above the finished floor level. Other piping and ducting works also connect the TO to the water buffer tank,

The ducting goes through the roof of the existing boiler house through the outlet left by the old ducting.

4.2.3.3 Water Buffer Tank

The water buffer tank will be 2.5m in diameter with a height of 8.8m above finished floor level, with the top of the tank at 9.8m high. The water buffer tank will be mounted on a concrete plinth of 3.0m by 3.0m and 0.2m high.

The physical scale of the Proposed Development in relation to the large existing buildings and plant on the site is minor. Most of the works are housed within an existing building and the top of the new stack at 47.9 m is considerably lower than the existing 63m chimney which is to be demolished under Prior Approval (21/01253/PRIORD).

The Proposed Development is deemed to be of an appropriate scale and acceptable in design and planning terms.

4.2.4 Appearance

The details of the appearance are shown on the following drawings:

- Planning Drawing 29056-109-ADM – Proposed South and West Elevations;
- Planning Drawing 29056-110-ADM – Proposed East Elevation; and
- Planning Drawing 29056-111-ADM – Proposed North Elevation.

Planning Drawings for an intermediate situation (whereby the existing chimney stack is still in place temporarily, prior to demolition, and the Proposed Development has been constructed) have been provided:

- Planning Drawing 29056-106-ADM – Intermediate South and West Elevations;
- Planning Drawing 29056-107-ADM – Intermediate North Elevation; and
- Planning Drawing 29056-108-ADM – Intermediate East Elevation.

Visualisations of the Proposed Development and the existing plant are shown on the following drawings:

- 29056-501-ADM-Photo Collage-West Elevation;
- 29056-502-ADM-Photo Collage-East Elevation; and
- 29056-503-ADM-Photo Collage-North Elevation.

4.2.4.1 Boiler House

The existing boiler house is a steel framed building with a pitched roof, both the building and roof are constructed of steel panels. The external alterations to the boiler house comprise:

- a new fire escape on the west elevation – comprising a steel framed staircase with a handrail;

- new fire door on the west elevation – a 30 minute (FD30) fire rated door, typically of a grey metal construction;
- alterations to existing sliding door on the west elevation – no material change in appearance;
- flue of grey metal construction through existing outlet on the roof;
- three new ventilation louvres and glazed windows – with the louvres and window frames (grey aluminium) in the style and material to match the existing louvres; and
- a plate mounted fan on the north elevation.

In addition, a new internal partition wall and access door will be constructed. The new plant located within the existing boiler house are shown on drawing 29056-112-ADM – Final Proposed Floor Plan.

The whole of the boiler house roof will be removed to allow for the installation of the thermal oxidiser, caustic scrubber, caustic tank and high sulphate buffer tank within the building. Once the new plant is installed, the existing roof will be placed back onto the building and the new ducting connected through the outlet left by the previous ducting which will be removed (see drawing 29056-113-ADM – Proposed Roof Plan).

4.2.4.2 Stack and Ducting

The details of the appearance of the stack and ducting are provided on the elevation drawings. The stack, access ladder and platform, and ducting will be made of grey stainless steel. The stack will be RAL7035 grey.

4.2.4.3 Water Buffer Tank

The details of the appearance of the water buffer tank are provided on the elevation drawings. The buffer tank will be constructed of a black pigmented high density polyethylene.

It is considered that the materials and appearance of the Proposed Development are appropriate within the wider industrial context.

4.2.5 Landscaping

No additional landscaping or biodiversity features are proposed as part of the development. Following the enabling and construction works, the land will be made good to existing ground levels and reinstated to its original condition, ie. hard landscaping of either concrete or tarmac.

4.2.6 Lighting

Suitable indoor illumination will be provided throughout the Proposed Development to facilitate normal operation and maintenance activities as well as for safety. No additional external lighting is proposed as part of the Proposed Development and any external illumination will be provided by existing lighting on site. No lighting will be required during the construction phase. Stand-by emergency lighting will be provided where necessary.

4.3 Access

The construction and operational traffic will access/egress the site via the existing access from Church Manorway to/from the trunk road network. The Proposed Development will be accessed from the existing internal road network within the ADM site. There will be no public access to the site and access will be strictly controlled in accordance with existing protocols.

4.4 Movement

During construction, movement within the site will be controlled as necessary. ADM has considerable experience of managing movement within the site as it has regular maintenance scheduled that requires access to be restricted to certain parts of the site at certain times.

Once operational, movement within the site will not be affected by the Proposed Development.

4.5 Community Safety

Community safety will be ensured by the location of the Proposed Development, which is wholly within the ADM landholding. In addition, temporary fencing will be constructed around the construction works within the site to prevent public access. The existing permanent fencing will not be affected. Other appropriate safety measures will be implemented if necessary.

Neither the construction works nor the operational plant will be accessible to visitors without prior approval and each visitor must undergo a mandatory induction and be provided with appropriate Personal Protective Equipment (PPE) before they are allowed on site.

4.6 Response to Planning Policy

An assessment of the extent to which the Proposed Development complies with relevant national and local planning policy is set out in Section 7 of this Statement and it is considered that the design of the Proposed Development is appropriate to its function and setting and it complies with policy.

5. CONSTRUCTION MANAGEMENT PLAN

5.1 Proposed Programme

Enabling works, which do not constitute development and do not require planning permission, will commence in June 2021.

All other construction works, contained within the planning application will commence on receipt of planning permission. Construction works are programmed to be completed in December 2021.

5.2 Working Hours

Normal construction working hours will be 07:00 to 19:00 Monday to Friday. Occasionally works may be required on Saturdays between 08:00 to 13:00.

During a planned site operation shutdown in October 2021, the working hours will increase to 07:00 to 19:00 Monday to Sunday.

5.3 Fencing/Hoarding of Construction Activities

Temporary Heras fencing will be used to cordon off the construction areas from the operational areas on site, throughout the duration of the construction works. For the minor pipe works, the construction area will be cordoned off with temporary hazard tape and barriers.

5.4 Site Access

The construction traffic will access/egress the site via the existing access from Church Manorway to the trunk road network.

5.5 Vehicular Movements and Deliveries

It is anticipated that construction traffic will average around two to three HGV movements per week. The HGVs and contractor traffic will access/egress the site via the existing access from Church Manorway to the trunk road network. ADM will seek to manage deliveries so as to minimise HGV movements during rush hour.

It is noted that the normal Erith site operations involves circa 300 HGV movements per day so that the additional effect of construction traffic will be insignificant.

5.6 Loading and Unloading of Plant and Materials

Loading and unloading hours will take place between 07:00 and 17:00 Monday to Friday.

5.7 Contractor Parking

Contractor parking will be provided within the existing dedicated ADM parking area to the west of Church Manorway. No additional parking spaces will be provided.

5.8 Plant/Equipment

The following construction plant and equipment is expected to be required:

- Crane(s) will be required to install the equipment in the building and for high level pipe installation;
- Piling rig for stack foundation installation;
- Tele-handler to move pallets with equipment and other materials;
- Excavator for stack foundation works;
- Forklifts; and
- Cherry picker and mobile elevating work platform.

5.9 Site Offices and Welfare Facilities

Three temporary welfare facilities will be provided, in the form of 20 foot cabins, located on undeveloped land to the east of the existing silos on the eastern part of the site. Temporary shower and toilet facilities, a 24 foot cabin, will be located adjacent to the gate house.

A temporary site office, a single 20 foot cabin, will be located on part of the existing staff car park within the ADM site. A temporary workshop will be located to the east of substation 3 on the east of the ADM site.

The temporary office and welfare facilities will be on site for the whole period of the construction work, expected to be completed by December 2021.

5.10 Storage of Plant and Materials

Three storage areas will be located on existing undeveloped areas on the eastern part of the ADM site.

All materials will be covered by appropriate sheeting and securely fastened and regular checks will be made for spillages on site and on the adjoining road network. The Principal Contractor will have responsibility for monitoring the condition of the storage facilities.

5.11 Road Cleanliness

The construction vehicles will be operating on made hardstanding areas at all times and as such dedicated wheel washing facilities are not considered necessary. All vehicles leaving the site will be checked that they are clean before leaving the site. In addition there will be regular monitoring of adjoining highway/footpaths in terms of cleanliness.

5.12 Dust and Control Measures

The following dust and control measure will be put into place:

- the use of fine sprays during the loading or unloading of materials, any cutting and drilling plant, unpaved areas, sand and aggregate stockpiles;
- the burning of waste or unwanted materials on site to be strictly forbidden;
- the covering of all skips; and
- the correct use of all plant and machinery and regular maintenance of their exhaust systems, which are to be positioned as far away from adjoining buildings as possible.

5.13 Site Waste Management

The following site waste management measures will be put in place during construction:

- where practical, salvage and re-use waste resulting from site clearance and demolition will be salvaged (such as crushed concrete or soil reused for landscaping);
- where reuse is not practical or possible, the contractor will endeavour to recycle and provide segregated waste and recycling skips;
- hazardous materials are to be sealed, stored and disposed of in appropriate and safe manner in order to avoid contact with ground- or wastewater;
- the burning of waste will not be allowed on site; and
- the management and disposal of any remaining landfill waste will be handled in accordance with all relevant statutory requirements, including the Environmental Protection Act 1990 and the Environmental Permitting Regulations 2007.

5.14 Noise and Vibration

In order to minimise construction noise and vibration best practical means will be used at all times to minimise the noise and vibration impact of the works in line with BS5228:2009. Machinery and vehicles will be fitted with effective silencers wherever available, and kept in good working order.

5.15 Conclusion

The construction management measures are intended to ensure that there are no significant impacts on nearby receptors during construction.

6. ENVIRONMENTAL SITE CONTEXT AND CONSIDERATIONS

The Proposed Development is located entirely within the existing ADM site within a wider industrial area. There are no designated sites covering built or natural protected assets within the planning application site.

6.1 Air Quality

An Planning and Design Statement Report which forms Appendix A to the Statement.

The site currently uses a TO to abate the waste gases from the mineral oil extraction system. The new TO oxidiser and integrated wet caustic scrubber will result in a change in emissions and emission patterns (associated with the new stack, lower exit temperatures and different flow rates). The results of the air quality impact assessment show that process contributions are not predicted to be significant and are not predicted to exceed air quality standards for the protection of human health. The assessment predicts considerable improvement over current emissions and shows the likely beneficial effect for human health and for potential odour nuisance of the new abatement system, which is the design objective of the Proposed Development.

The new TO will improve both safety and reliability of the abatement technology and reduce the risk of exceptional events whereby the abatement technology is bypassed due to process failures. The overall risk of odour nuisance of such events at residential receptors is predicted to be within applicable standards and low due to the distance and location of those receptors and the expected low frequency and duration of such bypass events.

Therefore, it is considered that there are no reasons for refusal on air quality grounds.

6.2 Ecology and Biodiversity

An assessment of potential impacts of air emissions on sites designated for their national and local ecological importance has been undertaken and is reported in Appendix A. It considered seven Sites of Special Scientific Interest (SSSIs) designated for biological interest within 10km of the site and three Local Nature Reserve (LNRs), one Ancient Woodland and 12 Site of Interest for Nature Conservation (SINCs) within 2km of the site. No European designated sites (i.e. Special Area of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites) were identified within 10km of the site.

The assessment of the potential effects of air emissions on ecological sites designated for their national and local importance for nature conservation has shown that the emissions associated with the Proposed Development situation are not predicted to result in likely significant effects on any of the identified national or locally designated sites.

Therefore, it is considered that there are no reasons for refusal on ecology and biodiversity grounds.

6.3 Landscape and Visual

The application site is entirely within the existing ADM industrial complex which forms part of the wider Belvedere Industrial Area. The local landscape is dominated by the surrounding large industrial area comprising a mix of warehousing, distribution and industrial buildings and plant.

The Proposed Development is of a smaller scale than the existing plant, with the removal of the existing chimney stack, and represents a minor change to character of the immediate ADM site and a negligible change to the wider industrial area. There are no adjacent residential receptors and due to the landform, screening from other industrial developments and distance there will be no impact on residential amenity. The Proposed Development will not result in any visual harm to the landscape character nor to visual amenity in the surrounding area (refer to Planning Drawings: 29056-501-ADM-Photo Collage-West Elevation, 29056-502-ADM-Photo Collage-East Elevation and 29056-503-ADM-Photo Collage-North Elevation).

Therefore, it is considered that there are no reasons for refusal on landscape and visual grounds.

6.4 Cultural Heritage

There are no statutory heritage assets directly or indirectly affected by the Proposed Development. There are two locally listed buildings with the ADM site but outside of the planning application boundary (grain silos and administrative buildings) and a locally listed war memorial to the north of the ADM site. There are no direct or indirect impacts on the locally listed buildings. The character and scale of the Proposed Development within an industrial landscape will not impact on the setting on the locally listed buildings.

Therefore, it is considered that there are no reasons for refusal on cultural heritage grounds.

6.5 Traffic and Transport

The traffic travelling to and from ADM site will be via the existing access from Church Manorway to the trunk road network.

Approximately two to three HGV movements per week, using 30 tonnes roll on/roll-off lorries, will be required to transport construction materials on to the site. This compares to circa 300 HGV movements at the site daily in the course of normal operations. The proposed construction works are therefore expected to result in an insignificant, and temporary, increase in traffic over ADM's normal operations over the construction period.

The Proposed Development will not generate any additional staff or HGV traffic once it is operational. No new car parking or road access is proposed as part of the Proposed Development. Employees and contractors will continue to park in the designated parking areas, and access within the site will continue to be restricted as per existing operations. The Proposed Development replaces existing operations with the same function and will not generate additional transport movements once it is operational and there will be no adverse impact on the local transportation network and related accessibility once operational.

Therefore, it is considered that there are no reasons for refusal on highways and transport grounds.

6.6 Noise

The local noise environment is dominated by industrial activities within the Belvedere Industrial Area. It is already industrial in character. There are no residential receptors close to the site. The closest residential receptors are around 400m from the ADM site boundary and 500m from the planning application boundary, dominated by background railway and road noise from the A2016. Noise impacts from the Proposed Development are expected to be considerably below guideline levels and not discernible within the context of the existing background noise. Therefore it is considered that the operational noise impacts of the Proposed Development are not significant.

It is intended by the applicant that standard mitigation and management measures for controlling construction noise will be implemented on site. The application of such measures as those listed below will result in no significant adverse noise impacts during construction:

- Best Practicable Means, as defined in the Control of Pollution Act 1974, will be applied to reduce emissions of noise and vibration throughout the construction period;
- no significant noise generating activities will be carried out at night, i.e. between the hours of 23:00 to 07:00 Monday to Sunday;
- each item of powered machinery used on site will be properly maintained and serviced to prevent unnecessary noise emissions. Routine checks will be undertaken to identify equipment that is emitting unacceptably high noise levels, or particularly tonal characteristics, and which, through appropriate repair or general servicing, could have their noise levels reduced;

- all plant and equipment shall be properly maintained, provided with effective silencers and operated in a manner to avoid causing any excessive noise or exhaust emissions. Where plant has been designed to operate with engine covers to reduce noise, these shall be used and remain closed at all times whilst the plant is in operation; and
- notwithstanding the above, any item of machinery found to be emitting excessive noise levels due to a faulty silencer, broken or ill-fitting engine covers or other reasons, shall immediately be taken out of service and be adequately serviced, repaired or replaced prior to being returned to use on the site.

The low level of construction traffic movements associated with the Proposed Development would result in temporary and negligible noise impacts.

Therefore, it is considered that there are no reasons for refusal on noise grounds.

6.7 Flood Risk

The wider ADM Erith site is located on the south bank of the River Thames, within Environment Agency Flood Zones 2 and 3, and in an area benefiting from flood defences. As the planning application site itself is located within Flood Zone 3, it is necessary for a flood risk assessment to be undertaken for the Proposed Development. The location of the site within the EA flood zones is shown on Figure 1.

6.7.1 Planning and Guidance

This high level assessment is in line with the NPPF which aims to ensure that flood risk is taken into account at all stages in the planning process and is appropriately addressed.

The NPPF states that 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk; but where development is necessary, making it safe without increasing flood risk elsewhere' (paragraph 155). This element of the NPPF is implemented with the Sequential Test, which is designed to steer development, particularly water non-compatible development, away from areas at risk of flooding, and encourage such development to be located in areas with a lower probability of flooding. In situations where it is not possible to move development into lower probability flood risk areas, the exception test can be applied if appropriate.

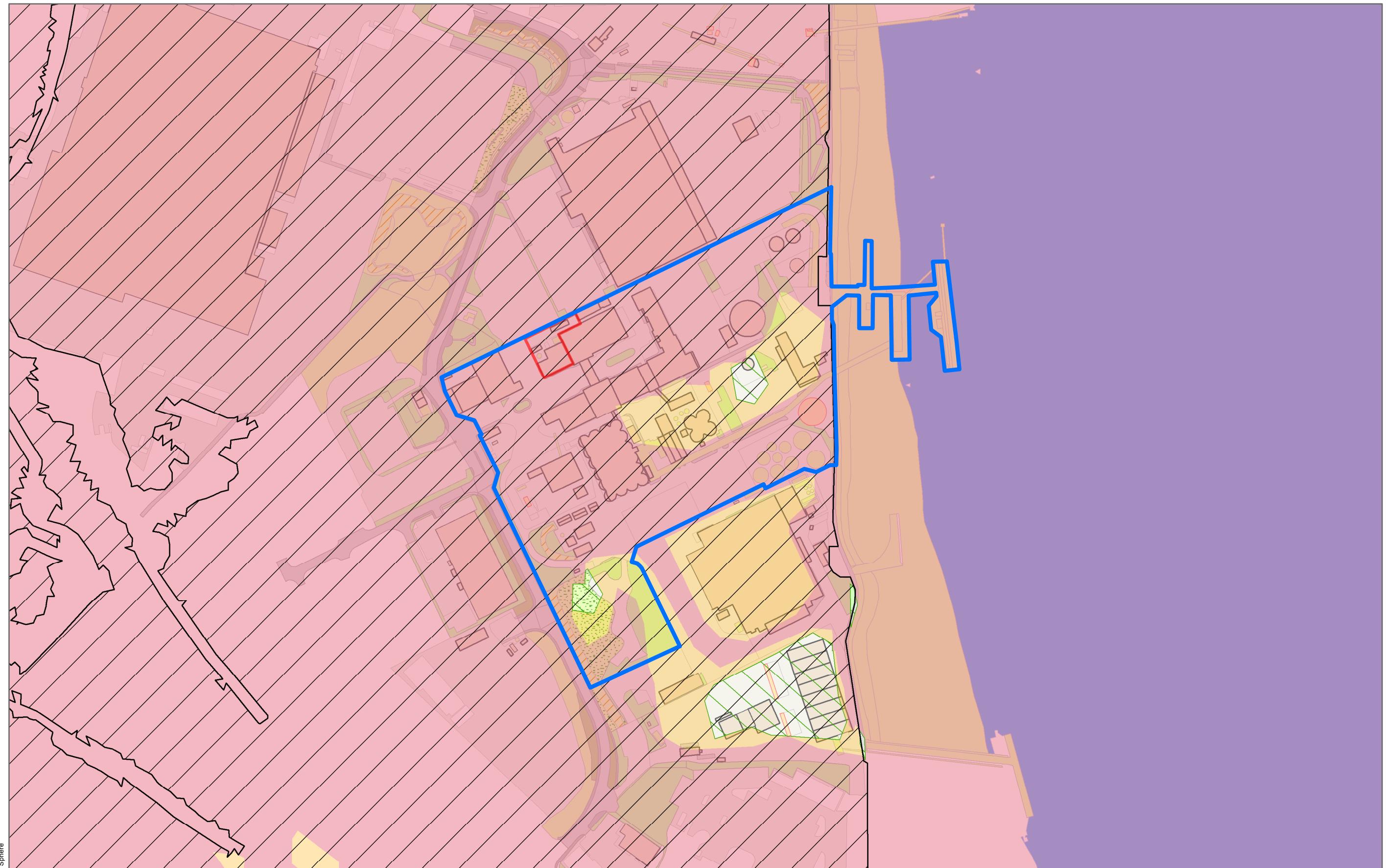
As detailed in the NPPF in paragraph 160, the exception test will be passed when:

- it is demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, informed by a Strategic Flood Risk Assessment (SFRA) where one has been prepared; and
- a site-specific FRA must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

As the site is located at an existing facility that is already in operation within the flood zone, it is not possible or practical to apply the sequential test by seeking alternatives. As such, this assessment seeks to demonstrate that the exception test is met.

The Flood and Water Management Act 2010 (FWMA) introduced new responsibilities for designated Risk Management Authorities with regards to flood risk and sustainable drainage. The most notable features of the FWMA with regards to the Proposed Development are discussed below.

Under the FWMA, the unitary authority or county council for an area, in this case the LB of Bexley, is designated the Lead Local Flood Authority (LLFA), with responsibility for managing flood risk from surface water, ground water and ordinary watercourses within their area.



PROJECTION: WGS 1984 Web Mercator Auxiliary Sphere

 ADM Land Ownership Boundary

 Flood Zone 3

 Application Boundary

 Areas Benefiting from Flood Defences

 Flood Zone 1

 Flood Zone 2

0 50 100 150 200 250
Meters



Figure 1
Flood Zones
ADM Erith

SCALE: See Scale Bar

VERSION: A01

SIZE: A3

DRAWN: JS

PROJECT: 0584457

CHECKED: AG

DATE: 30/06/2021

APPROVED: AG



Schedule 3 of the FWMA introduced new National Standards for Sustainable Drainage Systems (SUDS) with which proposed drainage systems should comply. As the Proposed Development will not result in any change to the surface water drainage system, or drainage regime of the site, the implementation of the FWMA does not apply.

Finally, under the terms of the Water Resources Act 1991, the EA's prior written consent is required for any proposed works or structures in, under, over or within 9 metres of the top of the bank of a main river or within 9 metres of the landward toe of a flood defence. This is to ensure that any works do not increase flood risk, damage flood defences, or harm the environment, fisheries, or wildlife (Water Resources Act 1991).

In the case of the Proposed Development, works will not be undertaken within 9m from the toe of the current flood defences, and as such, no consent under the Water Resources Act to cover flood risk activities is believed to be required.

6.7.2 Site Description and Proposed Development

The site is characterised by 100% impermeable hard standing area, comprising concrete, tarmac and building roofs. The site is largely occupied by industrial buildings and parking areas.

The site itself is essentially flat, with topography generally falling to the East in the direction of the River Thames. The immediate surroundings include further industrial buildings within the wider Belvedere Industrial Estate, which is also predominantly characterised by impermeable surfaces.

In terms of the Proposed Development, only elements external to the existing building could have an effect on flood risk. The new stack replaces an existing chimney stack which is to be demolished under Prior Approval (21/01253/PRIORD). Table 1 sets out the status of these elements, and the size and locations of these elements.

Table 1: Size and Location of Elements of Proposed Development

Element	Size (m)	Location
Thermal oxidiser,	N/A	Inside existing boiler hall
Caustic scrubber	N/A	Inside existing boiler hall
Caustic tank	N/A	Inside existing boiler hall
Water buffer tank	2.5 (diameter)	Outside boiler hall
High sulphate buffer tank	N/A	Inside existing boiler hall
New stack	1.3 (stack diameter)	Outside boiler hall
Existing Chimney Stack to be demolished	- 4.4 ¹ (diameter)	Outside boiler hall
Ducting	N/A	Outside boiler hall across to the new stack and water buffer tank

6.7.3 Flood Risk Assessment

Of the seven individual elements, which make up the Proposed Development, only the new stack and water tank are located outside of existing buildings and could potentially affect surface water runoff or displacement of floodwater. All other elements of the Proposed Development will be located inside existing buildings, and are thus not expected to result in any change to the existing baseline.

¹ Size is represented as a minus value as this element will be demolished to facilitate the Proposed Development

6.7.4 Fluvial/Tidal Flooding from the River Thames

As the site is located in an area currently benefiting from flood defences, the primary risk from the Proposed Development would be in the event of overtopping of the defences. In this case, the construction of any new infrastructure within the flooded area would potentially displace this floodwater to other areas, increasing the residual risk of flooding to areas outside the ADM site.

The new stack will have a diameter of 1.3m but will be on a 25m² plinth. The water buffer tank will have a diameter of 2.5m on a 9.6m² plinth. Table 2 demonstrates how the additional area within the floodplain occupied by these two new external elements of plant will be more than offset by the demolition and removal of the existing chimney stack, which has a diameter of 4.4m.

Table 2: Element of Proposed Development Footprint within Flood Zone 3

	<u>Length, m</u>	<u>width, m</u>	<u>Heights, m</u>	<u>Volume, m³²</u>
Old chemical bund (to be removed)	4.82	3	1	-14.46
New plinth for chimney	2.2	2.2	0.3	1.45
New chimney		1.3	0.7	0.93
Old chimney (to be removed)		4.4	1	-15.21
Water tank plinth	3	3	0.175	1.58
Water tank		2.5	0.825	4.05
Fire escape steps	2.015	1.25	0.44	1.11
Total Volume difference				-20.55

The Proposed Development will reduce the level of floodplain occupation within the site and will make additional space for water, reducing the impact of such flooding in the event of an overtopping event. More generally, in the context of what is a large and built-up site, the Proposed Development will make a very limited difference to the overall volume of the site occupied by buildings and other structures.

6.7.4.1 Surface Water/Pluvial Flooding

The site is currently entirely covered with impermeable hardstanding, and the construction of new elements and demolition of the existing chimney stack will not change that. As such, there will be no change in the baseline infiltration capacity of the site. Furthermore, the new stack and water buffer tank have been located away from likely surface water flow paths, so the potential to divert surface water is considered low.

6.7.5 Conclusions

This assessment demonstrates how the Proposed Development passes the exception test, by reducing the level of floodplain occupation within the flood zone, effectively reducing the potential for flood water displacement, whilst leaving other baseline flood parameters unchanged.

² Volumes are based on a water depth of 1m.

7. PLANNING POLICY COMPLIANCE

7.1 Introduction

The planning policy framework for this application is set through guidance provided at the national, regional and local level. The policy framework relevant to the planning application is the:

- National Planning Policy Framework (2019), which sets out Central Government's planning policies for England and how these are to be applied;
- The London Plan (2021), which sets out the framework for the development of London and is part of the statutory development plan for London and informs decisions on planning applications across the city.;
- Bexley Core Strategy (adopted 2012), which sets out a spatial planning framework for the Borough with a focus on promoting the principles of sustainable development; and
- Bexley Unitary Development Plan (UDP) (saved policies 2012).

Section 70(2) of the Town and Country Planning Act 1990 provides that the local planning authority (LPA) '*shall have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations*'. In addition s38(6) Planning and Compulsory Purchase Act 2004 ("PCPA 2004"), formerly s54A, provides: '*If regard is to be had to the development plan for the purposes of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations dictate otherwise*'.

The National Planning Policy Framework (NPPF) reiterates, in paragraph 2, that applications for planning permission must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

The key material considerations for the Proposed Development are:

- The Principle of Development (Location and Design);
- Air Quality;
- Ecology and Biodiversity;
- Landscape and Visual;
- Cultural Heritage;
- Traffic and Transport;
- Noise; and
- Flood Risk.

These issues are considered in this section, which draws on the conclusions of the consideration of potential environmental concerns.

7.2 Principle of Development (Location and Design)

The Proposed Development meets the general parameters relating to design, scale and sustainable development set out within NPPF and complies with national policy.

Detailed assessment of the Proposed Development against the relevant policies at both a national and local level is undertaken in the following sections.

7.2.1 Industrial Development

The Proposed Development is located within a Strategic Industrial Area under Policy E5 of the London Plan which states that they '*should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy*'.

The Proposed Development is located within the Belvedere Industrial Area as defined in the Bexley UDP and is within a Primary Employment Area. Saved UDP policy E3 states that land and buildings in the Primary Employment Areas will be safeguarded for industrial and commercial uses as appropriate to each area and saved UDP policy G14 states that the Council will support proposals for industry and commerce which assist the development of the local economy provided they are appropriate in scale and type of development for their location.

Saved UDP policy TS6 identifies general industry as one of the land uses, which together with associated buildings and infrastructure are permitted in the Belvedere Industrial Area. Policy G24 promotes the borough as a centre of industrial and business growth by encouraging the provision of modern accommodation and the renewal of older business estates to create a better working environment. Core Strategy Policy CS04, the vision for the Erith geographic region, supports improved environmental quality of industrial estates.

For the reasons set out above, the Proposed Development is compliant with policies which seek to protect and enhance industrial growth in the Borough, is located within an area safeguarded for industrial and commercial uses and will lead to improved environment quality of an existing industrial area.

7.2.2 Sustainable Development

Planning policies at national, regional and local level are consistent in their aim to achieve sustainable development that does not cause any significant adverse environmental impacts and supports economic sustainable development objectives.

The NPPF sets out the economic, environmental and social planning policies for England. Central to these main themes is a presumption in favour of sustainable development, and that development should be planned positively (paragraph 10).

The concept of Good Growth underpins the whole of the London Plan, and is defined as growth that is socially and economically inclusive and environmentally sustainable, informed by six objectives. Of relevance to the Proposed Development are objectives:

- GG1 in respect of ensuring changes to the physical environment achieve an overall positive contribution to London and seeking to ensure that London continues to generate a wide range of economic and other opportunities;
- GG2 in respect of making the best use of land and support efficient maintenance; and
- GG3 in respect of seeking to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution.

Core Strategy policy CS01 states that the Council will seek to achieve sustainable development, to create a strong, sustainable and cohesive community, in order to provide people equal access to a better quality of life, protect the environment, promote the local economy and encourage an active and healthy lifestyle. It states that sustainable development will be achieved by applying a number of principles including addressing pollution issues, such as noise and air quality, to contribute to the health and well-being of the community and the environment and helping the borough to continue to play a key role in contributing to London's economic growth and prosperity.

The Proposed Development will not lead to any change of use and will help retain economic activity within the Belvedere Industrial Area. Part of the sustainable development vision for the Erith

geographic region under Core Strategy policy CS04 is to consolidate employment areas, whilst retaining and creating new local jobs and improving the environmental quality of industrial estates.

As set out in Section 5 of this Statement, potential adverse environmental impacts have been considered and where necessary mitigated and minimised. No operational adverse impacts are predicted on the environment and the design purpose of the Proposed Development is an improvement in air quality which is predicted to be significant by comparison with current operations. The Proposed Development will consolidate employment and help to retain jobs in the area.

Overall, the Proposed Development meets the sustainable development objectives identified in national, regional and local policy.

7.2.3 *Design and Development Impacts*

Good design is a key aspect of sustainable development (NPPF, paragraph 124). The design of the Proposed Development will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development (NPPF paragraph 127 (a)) and is sympathetic to local character and history, including the surrounding built environment and landscape setting.

Policy D3 of the London Plan sets a number of design principles relevant to the Proposed Development. Policy D3 requires that the form and location of the development should seek to enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions and respond to the existing character of a place. The Proposed Development is appropriate to its function and setting, as described in Section 4 of this Statement and makes efficient use of land.

Policy D4 of the London Plan requires that design and access statements submitted with development proposals demonstrate that the proposal meets the design requirements of the London Plan. Section 4 of the Statement meets the design and access statement requirement and clearly demonstrates an appropriate design solution.

There are no specific policies guiding the design of industrial development within the Core Strategy, however, policies CS03 and CS04 highlight the importance of design solutions to ensure sustainable and resilient developments.

Saved UDP policy ENV39 seeks to protect and enhance the quality of the built environment and ensure that all new developments, are satisfactorily located and are of a high standard of design and layout. The Proposed Development is compatible with the character of the surrounding area, would not prejudice the amenity of the occupiers of adjacent property, or adversely affect the surrounding area by reason of its scale, massing, height, layout, elevational treatment, materials and the intensity of development.

Overall, the location, scale and character of the Proposed Development is considered to be acceptable in the existing industrial area of Belvedere and therefore complies with relevant policies. The Proposed Development in the context of the dominant industrial landscape is acceptable in design terms and complies with the policy requirements. Overall, development is supported that is appropriate to its context in terms of design, character, appearance and scale and meets the design objectives identified in national, regional and local policy.

7.3 *Development Management Policies*

7.3.1 *Air Quality*

Paragraph 181 of the NPPF states that planning policy decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants and that opportunities to improve air quality or mitigate impacts should be identified. Paragraph 170 states

that development should, wherever possible, help to improve local environmental conditions such as air quality.

The NPPF reiterates in paragraph 183 that the focus of planning decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.

Policy SI 1 of the London Plan states that 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.

Policy CS01 of the Core Strategy states that development proposals should address pollution issues such as air quality, to contribute to the health and well-being of the community and the environment. Core Strategy policy CS09 seeks to maximise the opportunities to improve health of the environment (e.g. air quality) and reducing pollution and conflicts between adjoining land uses, which is fundamental to providing a good quality of life. Core Strategy Policy CS04, relating to the Erith geographic region, states that the Council will take opportunities for improving the quality of the natural environment through improvements to air quality.

Saved UDP policy ENV39, in order to protect and enhance the quality of the built environment, seeks to ensure that all new development has no unreasonable effect on the surrounding area by reason of any emissions to air.

Saved UDP policy ENV41 seeks to ensure that development does not compromise air quality objectives and requires an Air Quality Assessment where proposals include industrial activities with potentially significant airborne emissions and have the potential to increase the personal exposure of individuals at non-occupational locations to levels of air pollution which are likely to exceed objectives set in either national or local Air Quality Strategies. An Air Quality assessment has been undertaken and provided in Appendix A to this Statement.

It concludes that process contributions are not predicted to be significant and are not predicted to exceed air quality standards for the protection of human health in the future situation during normal operations. This indicates a considerable improvement over the current situation and shows the likely beneficial effect (both for human health impacts as for potential odour nuisance) of the Proposed Development.

The Proposed Development will result in an improvement in air quality, which is its design purpose, and as such complies with policies at the national, regional and local level.

7.3.2 Ecology and Biodiversity

NPPF, in paragraph 170, states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity (in a manner commensurate with their statutory status or identified quality in the development plan) and should minimise the impacts on and provide net gains for biodiversity. This objective is supported in Policy G6 of the London Plan which requires that '*Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.*'

London Plan Policy G6 provides specific protection for SINCs. This is reinforced by Core Strategy policy CS18 which seeks to protect, conserve and enhancing Bexley's SSSIs and SINCs and to protect and enhance the natural habitat as far as practicable. Saved UDP policy ENV28 affords protection to local nature reserves resisting development that would endanger the preservation of those special characteristics that lead to designation.

The Proposed Development will result in no direct or indirect adverse impacts or effects upon the ecology or biodiversity of the area and is compliant with relevant national, regional and local policy.

7.3.3 Landscape and Visual

The Proposed Development demonstrates a clear understanding of, and relationship with, the distinctive features of its surrounding including buildings, structures and surrounding landscape, in accordance with the good design principles set out in the London Plan (paragraph 3.3.7). Core Strategy Policy CS13 seeks to ensure that new development improves the quality of industrial estates, including its visual impact.

The design of the Proposed Development is appropriate to its function and setting and does not result in any landscape and visual impacts and as such complies with policy.

7.3.4 Cultural Heritage

NPPF paragraph 184 recognises heritage assets as an irreplaceable resource that should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

London Plan policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Policy D3 states that development should enhance and utilise the heritage assets and architectural features that contribute towards local character.

Core Strategy policy CS19 seeks to conserve and enhance the significance of heritage assets, their setting, and the wider historic environment, including locally listed buildings, protecting heritage assets from development that is likely to adversely impact on the significance, integrity, character or appearance of an asset or its setting.

The built form of the Proposed Development works with the local heritage assets and there is no impact on or harm to the integrity of the locally listed buildings or their setting. The Proposed Development complies with national, regional and local policy.

7.3.5 Traffic and Transport

NPPF paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. London Plan policy T4 states that development proposals should not increase road danger.

In accordance with NPPF paragraph 110 and London Plan policy T7, the Proposed Development allows for the efficient delivery of goods, and access by service and emergency vehicles and adequate space has been provided for adequate space for servicing, storage and deliveries to be made off-street.

Saved UDP policy T6 states that developments will normally be refused where it would either cause local traffic flows to rise above the design flow for a road or would generate additional traffic on a road on which flows are already considered to exceed design flow.

The proposed development will not have any significant impact on traffic volumes or road safety and will not generate new transport movements once it is operational and as such complies with national, regional and local policy.

7.3.6 Noise

NPPF in paragraph 170 states that planning decision should prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of noise. Policy D14 of the London Plan states that development proposals should avoid significant adverse noise impacts on health and quality of life. Similarly Policy CS01 of the Core strategy DPD states that development proposals should address pollution issues such as noise, to contribute to the health and wellbeing of the community and the environment.

Saved UDP policy ENV39, in order to protect and enhance the quality of the built environment, seeks to ensure that all new development has no unreasonable effect on the surrounding area by reason of noise.

The Proposed Development during both construction and operation will not result in a significant adverse noise effect on nearby residential properties or amenity users. As such it complies with the relevant national, regional and local policy requirements.

7.3.7 Flood Risk

NPPF paragraph 155 states that where development is necessary in areas at risk of flooding, the development should be made safe for its lifetime without increasing flood risk elsewhere. Paragraph 163 states that when determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere and where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where the development is appropriately flood resistant and resilient.

London Plan policy SI 12 requires that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Core Strategy policy CS01 states that development should not increase the risks of flooding, subject to further detailed area/site analysis and meeting various criteria.

Core Strategy policy CS08 states that development proposals should follow the sequential approach to flood risk management advocated in national planning policy and its associated practice guidance and adopt flood risk management and sustainable drainage systems.

A quantified flood risk assessment has been undertaken and reported in Section 6.7.

No adverse effects in respect of flooding are expected as a result of the Proposed Development and it thereby complies with national, regional and local policy.

8. CONCLUSIONS

This Statement provides an assessment of the Proposed Development in relation to national, regional and local policy and other material considerations. The Proposed Development meets the following policy tests:

- the Proposed Development is suitably located and meets the requirements of the development plan policies;
- the Proposed Development is not expected to have significant adverse impacts in terms of air quality, ecology and biodiversity, landscape and visual, cultural heritage, traffic and transport, noise and flood risk and no sensitive receptors are expected to be subject to adverse effects or impacts;
- the site is not subject to any specific national or local policy designations or allocations which makes the development inappropriate in planning terms; and
- no planning obligations are necessary in order to make the Proposed Development acceptable in planning terms.

The Proposed Development is fully in accordance with policy at national, regional and local level and there are no other material considerations that should prevent the grant of planning permission.

9. REFERENCES

- London Borough of Bexley (2012) Bexley Core Strategy
- London Borough of Bexley (2012 as amended) Bexley Unitary Development Plan (saved policies)
- Mayor of London (2021) The London Plan The Spatial Development Strategy for Greater London
- Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework

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ERM's Bristol Office

One Castlepark
Tower Hill, Bristol
BS2 0JA

T: 0117 910 6700
F: 0117 910 6701

www.erm.com