

Council Depot Unit 1, Therapia Lane

Planning Statement

London Borough of Sutton

20 December 2023

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Appendix 1 Planning History

1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of The London Borough of Sutton (LBS) to accompany a full planning application for proposed alteration and refurbishment works to Council Depot Unit 1, Therapia Trading Estate, Therapia Lane, Beddington, Surrey CR0 3DH/CR0 4TN (the 'site').

1.2 The description of development is as follows:

“Re-cladding and refurbishment of existing warehouse including fenestration alterations, installation of PV panels, provision of new vehicular access from Coomber Way, resurfacing of hardstanding, provision of cycle parking, landscaping and erection of new boundary fencing.”

1.3 The purpose of this Planning Statement is to assess the proposed development against relevant policies in the Statutory Development Plan, having regard to other relevant material planning considerations. It draws upon other documents accompanying the application as outlined below.

Scope of the application

1.4 This Planning Statement should be read in conjunction with the following accompanying application forms, drawings and supporting documents:

- 1 Application Form and Ownership Certificate (PP-12586268);
- 2 Cover letter, prepared by Lichfields;
- 3 CIL Additional Information Form;
- 4 Site Location Plan, prepared by Bickerdike Allen Partners;
- 5 Existing and Proposed plans, elevations and sections, prepared by Bickerdike Allen Partners;
- 6 Design and Access Statement, prepared by Bickerdike Allen Partners;
- 7 Statement of Community Involvement, prepared by Lichfields;
- 8 Transport Statement, prepared by David Tucker Associates (DTA) Transport Planning Consultants;
- 9 Energy Strategy, prepared by Van Zyl & de Villers;
- 10 Fire Safety Strategy, prepared by Osborne Associates;
- 11 BREEAM Design Stage Review Tracker, prepared by Sustainable Construction Services;
- 12 Air Quality Assessment, prepared by Air Quality Consultants Ltd;
- 13 Noise Assessment, prepared by Bickerdike Allen Partners;
- 14 An Arboricultural Method Statement, prepared by Bernie Harverson Arboricultural Consultant;

- 15 A Tree Constraints Plan, prepared by Bernie Harverson Arboricultural Consultant;
- 16 A Tree Retentions and Removals Plan, prepared by Bernie Harverson Arboricultural Consultant;
- 17 An Arboricultural Photographic Evidence Sheet, prepared by Bernie Harverson Arboricultural Consultant;
- 18 Soft Landscaping Plan, prepared by Terrafirma;
- 19 External Lighting Strategy, prepared by Van Zyl & de Villers;
- 20 Construction Environmental Management Plan, prepared by Willmott Dixon; and
- 21 Sustainable Urban Drainage Strategy, prepared by Lyons O'Neill.

2.0 Site and surroundings

2.1 This section of the Statement provides a description of the site and its surroundings.

The site

2.2 The site is located between Therapia Lane and Coomber Way in the Therapia Trading Estate, Beddington Industrial Area, Sutton. It is approximately 2.5km west of Croydon town centre. The site is bounded to the north by Coomber Way; to the south by Therapia Lane; and by other industrial units and their associated hardstanding areas to the east and west.

2.3 The site has been used as a vehicle maintenance and operations depot since 2007 and comprises a single warehouse building, associated hardstanding areas and vehicle parking spaces. London Hire Community Services (LHCS) currently operates within the site, but its contract will be ending in 2024, when it will operate from another location. LHCS operates a range of minibuses and coaches that can be hired out with a driver across London and beyond.

2.4 The site is split into two parts; an area to the north extending to Coomber Way and an area to the southwest bounded by Therapia Lane (Figure 1). The north and southwest areas are linked by an access road that is a continuation of Greenland Way. This access road is used to access the neighbouring site.

Figure 1 – Site Location Plan (edged red)



Source: Bickerdike Allen Partners

- 2.5 The southwest area is occupied by a warehouse unit comprising a ground floor vehicle maintenance workshop and two floors of office accommodation. The warehouse is clad in profiled metal panels to the walls and roof and is currently unoccupied.
- 2.6 There is an area of hardstanding in front the warehouse which contains an existing vehicle wash down area and several temporary cabins. The hardstanding area is used for commercial vehicle parking for LHCS and has two vehicle entrances to the access road (from Greenland Way).
- 2.7 The northern part of the site is an area of hardstanding that is used for commercial vehicle parking (for LHCS), enclosed by metal fencing. There is an existing above-ground diesel fuel storage tank and refuelling area in the southeast corner of the north car park. There is no direct existing access to Coomber Way at the northern boundary of the site.
- 2.8 The site area is approximately 0.87ha.
- 2.9 The site has a Public Transport Accessibility Level (PTAL) rating of 2, which is an 'acceptable' level of accessibility to public transport.

Surrounding area

- 2.10 The wider urban context is characterised by primarily industrial/logistics use.
- 2.11 There is a small row of terraced houses within 100m to the south-west of the site along Therapia Lane. Another site comprising smaller warehouse units (occupied by Phoenix Scaffolding) separates the terraced houses from the site.
- 2.12 North of the site, beyond Coomber Way, is a Tramlink Depot, owned by TfL. Immediately east of the site are warehouses/depots operated by GAP Hire Solutions (plant/tool/welfare hire company) and Lia Asphalt (paving contractor). A warehouse of significant scale is located immediately west/north-west of the site, which comprises several occupants.
- 2.13 The site is approximately 70m east of a bus stop, serving the 455 and 463 buses. These routes link the site to Wallington Station, West Croydon Bus Station, South Croydon Station, Reedham Station, Coulsdon Town/South Stations and Mitcham Eastfield Station.
- 2.14 There are no listed buildings in the immediate vicinity of the site. The site is not located within, or close to, any conservation areas.

3.0 Planning history

- 3.1 A summary of the relevant planning history of the site and the surrounding sites is at Appendix 1 of this Statement.
- 3.2 The warehouse unit was originally developed as a MOT Testing Station under planning permission 93/38112/34R in 1994. The unit was refurbished approximately 15 years ago under planning permission D2006/56727 (approved in 2007) and has since been used as a vehicle maintenance and operations depot.
- 3.3 Since the 2007 permission was granted, no further applications are found on the Council's planning applications register, which aligns with the continued use of the warehouse and wider site by the applicant and LHCS since that period.

4.0 **Proposed development**

- 4.1 This section provides a summary of the proposed works. Full details are set out in the accompanying Design and Access Statement (DAS).
- 4.2 The proposals have been discussed with LBS's planning department via pre-application engagement. LBS also sought to engage with the public via hosting a consultation event prior to the submission. Details of the outcomes of this engagement are set out within the Statement of Community Involvement.
- 4.3 From April 2025, LBS's current waste and street cleansing service will need to relocate from another depot outside of Sutton to the proposal site. The existing warehouse was originally developed as an MOT testing station and the existing metal cladding is at the end of its functional life. The proposed works seek to modernise the warehouse building and provide additional improved access to the site, to allow the site to be used as a depot for LBS's fleet of waste collection and street cleansing vehicles. The works are proposed to the existing warehouse building and to external areas, as set out below.

Proposed works to the existing warehouse building

- 4.4 The existing superstructure of the warehouse building comprising the steel frame and ground floor slab will be retained. There will be two distinct building elements: a two-storey office space and a workshop. A new cladding system will be installed on the existing superstructure. The new metal cladding is proposed for the external walls and roof and will have a corrugated profile and vertical orientation to the external walls. The cladding colour will correspond with the surrounding industrial units.
- 4.5 The existing windows will be replaced with new aluminium framed windows and positioning adjusted to suit the internal layouts. In addition, a new roller shutter will be added adjacent to the existing roller shutter to improve access to the workshop. The existing canopy structure which extends out above the vehicle entrance roller shutters will be retained, and re-clad to match the new finish.
- 4.6 The proposal includes the installation of an area of photovoltaic (PV) panels on the southern end of the roof (subject to an assessment of the existing structure's capacity to support the weight of a PV array).
- 4.7 The proposed works will not result in any change to the existing footprint of the building (approx. 1,660sqm). The existing and proposed floorspaces of the warehouse are below:
- Total existing GIA: 2,075sqm
 - Total proposed GIA: 1,973sqm

Vehicle movements and parking

- 4.8 The proposal seeks to facilitate safe and efficient vehicle movements within the site for both the staff vehicles and operational waste service vehicles using the site. The addition of the new entry and exit points from Coomber Way mean a new one-way loop route can be formed through the northern section of the site. Only large waste collection vehicles will be

parked in the north car park. They will use the new access points and will not have to use the smaller existing Greenland Way route.

4.9 Smaller street cleansing vehicles will be parked in the south car park and will enter and exit the site via Greenland Way. The south car park will provide staff and visitor car parking along with designated spaces for the other vehicle types in the fleet as required by LBS.

4.10 Below summarises the proposed access/parking arrangements:

- 1 Pedestrian access: enhanced pedestrian access is provided as part of the proposal, with a new pedestrian gate on the western side of the site frontage onto Coomber Way. From this gate there will be a segregated footpath connection (2m in width) between Coomber Way and Therapia Lane.
- 2 Vehicular access: two new vehicular access points are proposed to be provided from Coomber Way to the north of the site, enabling a one-way movement of refuse collection vehicles, street cleansing vehicles and staff vehicles through the site.
- 3 Operational vehicle parking:
 - a 30 formal parking bays for the refuse collection (26 tonne) vehicles will be marked out on the hardstanding in the 'northern site'.
 - b Five Sweeper/Large Goods Vehicle bays (3.5×8m) to be provided on the forecourt (area adjacent to the warehouse within 'southern site').
 - c Four refuse collection vehicles bays (3.5m×11m) to be provided on the forecourt.
- 4 Staff parking:
 - a 15 car parking bays (2.4m×4.8m) including three accessible bays (3.6×6m) will be provided on the forecourt.
 - b Two holding areas will be created in the northeast and southwest corners of the hardstanding areas which are not required for refuse collection vehicles. These will be used by waste collection services staff, who would set down their personal vehicle before parking within the vacated bays allocated for refuse collection vehicles. It is envisaged that there will be demand for 32 staff vehicles to park within these bays.
- 5 Cycle access: cycling to the site will be encouraged via the provision of 20 cycle parking spaces.
- 6 11 Electric Vehicle charging points will be provided at the outset, in addition to six passive spaces (three for staff vehicles and three for management vans) which can be provided in the future.

4.11 A parking schedule for the proposal is below:

Vehicle type	Space dimensions	No EV charging	EV (active)	EV (passive)	No spaces
RCV	11m×3.5m	30			30
Staff/visitor	5m×2.5m		7	3	10
7.5T tipper	8m×3.5m		4		4
Graffiti van	8m×3.5m	1			1
12T sweeper	11m×3.5m	2			2
Hia-ab	11m×3.5m	2			2
Manager van	5m×2.5m	2		3	5
Total		37	11	6	54

Other proposed works to external areas

- 4.12 The vegetation covering the overgrown area between the south elevation of the warehouse building and the southern site boundary with Therapia Lane will be cleared. The hardstanding areas will be re-surfaced, and the existing boundary fence line will be reinstated and repaired where required.

- 4.13 The soft landscaping scheme for the proposal incorporates native shrub planting and climbers along the western boundary of the ‘northern’ section of the site. Native shrub planting, native groundcover planting and climbers are also proposed in the southern section of the site, just south of the warehouse along Therapia Lane.

- 4.14 The existing above-ground diesel fuel storage tank and refuelling area in the southeast corner of the north car park will be relocated to enable an improved parking layout and to make space for electric vehicle charging points.

- 4.15 The site area of 0.87ha is below the 1ha threshold for a major development and confirmation was received from the Council on 28 July 2023 that this proposal will be classified as a minor development as set out in the Town and Country Planning Order 2010.

5.0 **Planning policy context**

5.1 This section identifies relevant planning policy and guidance at a national and local level. The proposed development is then assessed against the policies in Section 6.o.

The Statutory Development Plan

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004, indicates that determination of a planning application, like this one, must be made in accordance with the development plan unless material considerations indicate otherwise.

5.3 The Statutory Development Plan for the site comprises:

- The London Plan (LP) (2021); and
- Sutton Local Plan (2018).

Site designations and relevant planning policies

5.4 The site is subject to the following planning policy designations:

- Beddington Strategic Industrial Location (SIL)
- Archaeological Priority Area

5.5 Having regard to the Statutory Development Plan and the site designations identified above, the following planning policies are relevant to this application:

London Plan

- 1 Policy D1 London's form, character, and capacity for growth
- 2 Policy D3 Optimising site capacity through the design led approach
- 3 Policy D4 Delivering good design
- 4 Policy D12 Fire safety
- 5 Policy D14 Noise
- 6 Policy E4 Land for industry, logistics and services to support London's economic function
- 7 Policy E5 Strategic Industrial Locations (SIL)
- 8 Policy G5 Urban Greening
- 9 Policy SI 1 Improving air quality
- 10 Policy SI 2 Minimising greenhouse gas emissions
- 11 Policy SI 13 Sustainable drainage
- 12 Policy T5 Cycling
- 13 Policy T6 Car parking

Sutton Local Plan

- 1 Policy 14 Industrial Land and Waste Management

- 2 Policy 28 Character and Design
- 3 Policy 29 Protecting Amenity
- 4 Policy 31 Carbon and Energy
- 5 Policy 32 Flood Risk and Sustainable Drainage
- 6 Policy 34 Environmental Protection
- 7 Policy 36 Transport Impact
- 8 Policy 37 Parking

Other material considerations

- 5.6 Other material considerations include national and regional planning policy and guidance and other supplementary documents. Relevant material considerations are considered below.

National Planning Policy Framework (NPPF)

- 5.7 The NPPF (December, 2023) sets out national planning policy guidance and is a material planning consideration in planning decisions. The NPPF has a presumption in favour of sustainable development. Paragraph 11 clarifies that for decision-taking this means *“approving development proposals that accord with an up-to-date development plan without delay”*.

Supplementary planning documents and guidance

- 5.8 LBS’s Supplementary Planning Document (SPD) 14 is also of relevance to the proposal:
- Sutton’s Urban Design Guide – Creating Locally Distinctive Places

Emerging policy

- 5.9 LBS is in the process of reviewing its Local Plan. It will set out how Sutton will develop over the next 15-20 years. A Call for Sites consultation took place in November 2022. The first stage of consultation on the Issues and Options and Preferred Options document was anticipated in early 2023 but has been delayed. Given its early stage, the emerging Local Plan has no weight in decision-making.

Key planning considerations

- 5.10 From our analysis of the above policy context, we consider the following planning considerations represent the key policy matters against which the application should be determined:
- 1 Principle of development
 - 2 Design and public realm
 - 3 Transport, access and parking
 - 4 Energy and sustainability
 - 5 Noise

- 6 Air quality
- 7 Trees and landscaping
- 8 Flood risk/drainage
- 9 Fire safety

5.11 Our assessment of the planning application against these policy considerations is set out in the next section.

6.0 **Assessment**

6.1 This section assesses the proposed development against the key planning matters.

Principle of development

6.2 The NPPF requires the Council to promote an effective use of land, including previously-developed or 'brownfield' land (para. 89). The LP encourages intensification and optimising of land subject to justification within the local context. Policies E4 and E5 of the LP outlines that development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities. Policy 14 of LBS's Local Plan states that within SILs, the Council will grant planning permission for B2 (industrial and manufacturing) and B8 (storage and distribution) uses or similar uses. It also states that the Council will support proposals which intensify industrial floorspace in the Beddington Strategic Industrial Location either by the reconfiguration of sites or the amalgamation of sites.

6.3 The application site is located within the Beddington SIL and comprises a single warehouse unit and associated hard standing used for parking. The proposals seek to refurbish and enhance this existing unit to bring it up to modern standards. The Council's pre-application advice notes that the proposed development will not materially change the lawful use of the site. As such, the proposal is in accordance with the policies outlined above and is acceptable in principle.

Design and public realm

6.4 The NPPF states that planning authorities should always seek to secure high quality design to ensure that developments, among others, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping and are sympathetic to local character including the surrounding built environment (Section 12 – Achieving well-designed places).

6.5 Policies D1, D3 and D4 of The LP state that Local Authorities should seek to ensure that developments promote high quality design and enhance the public realm.

6.6 Policy 28 of the Sutton Local Plan and SPD14 'Urban Design Guide' requires development to respect or reinforce the character and identity of the area and avoid developments which do not integrate well into the surroundings. The Urban Design Guide also considers that good urban design should create attractive well-functioning spaces within the site.

6.7 The application site and surrounding area is predominantly industrial in nature, with the Beddington Industrial Estate to the south, east and west of the site. The proposal would see the refurbishment of a building with no architectural merit that no longer meets modern standards and requirements. The accompanying DAS outlines the proposed materiality and design of the proposals and demonstrates how these have been selected to respond to the context. This will result in an improvement in the appearance and performance of the building, in line with current design and safety standards.

6.8 Given the above reasons, it is considered that the design of the proposal would be acceptable and would be in keeping with other developments within the Beddington Lane

SIL. The proposal would therefore accord with Policy 28 of the Sutton Local Plan, the Council's Urban Design Guide and the relevant design policies of the London Plan.

Transport, access and parking

- 6.9 The NPPF seeks to encourage sustainable forms of travel within schemes and neighbouring areas and be designed to enable charging of electric vehicles (para. 112). Chapter 10 'Transport' of the LP provides policy on a range of transport matters, encouraging the increased use of sustainable transport modes to reduce reliance on cars (Policies T5 and T6). Policy 36 of LBS's Local Plan states that the Council will assess all new development applications for their impact on the existing and proposed transport infrastructure and services, and the local environment. Local Plan Policy 37 requires a proportion of all parking spaces to be provided for charging of electric vehicles.
- 6.10 A Transport Statement has been prepared by DTA which accompanies the application. This concludes that the potential transport implications of the proposal are limited, given that the proposed use of the site does not comprise a material change of use, or material change in vehicle movements (by both the staff vehicles and operational waste service vehicles). It also outlines that the new vehicular access to/from Coomber Way will result in significant reduction in site traffic using Greenland Way and Therapia Lane.
- 6.11 The Transport Statement notes that the development will provide more efficient access and internal layout arrangement, better suited to the future needs of LBS's Waste Collection Services and Street Cleansing Services. The proposed new accesses on Coomber Way (of c. 6m width each) will allow efficient one-way circulation of vehicles within the site. An existing refuelling point at the southeastern corner of the site will be re-provided in a central location close to the southern boundary of the site. This is a more optimum location as it will allow refuse collection vehicles to refuel either side of the tank.
- 6.12 On the hardstanding, 30 formal parking bays for the refuse collection vehicles will be marked out. These bays are capable of being reconfigured for electric refuse collection vehicles in the future without requiring fundamental change to the accesses, therefore contributing to the passive charging provision.
- 6.13 The layout of the site and additional proposed access points will enable a much more efficient movement of vehicles around the site. The new parking arrangements will result in fewer staff vehicles parking in nearby roads and the provision of electric vehicle charging points for existing and future electric vehicles. Sustainable forms of transport for staff will be encouraged via the enhanced pedestrian access and cycle parking provision on site. The proposal is therefore in accordance with the above-mentioned transport/highways policies.

Energy and sustainability

- 6.14 LBS Local Plan Policy 31 and LP Policy SI2 sets out requirements for energy reduction for major developments and residential developments (achievement of at least 35% reduction in regulated CO₂ emissions on site, compared to Part L of the 2013 Building Regulations). Both the Local Plan and LP seek to minimise CO₂ emissions on site and outline that developers should prioritise energy efficient measures from the earliest stages of the project planning and design, in line with the Mayor's energy hierarchy (Be Lean: use less energy; Be Clean: efficient energy demand; and Be Green: use renewable energy).

- 6.15 An Energy Strategy has been prepared by Van Zyl & de Villiers Ltd to accompany the planning application. A BREEAM Design Stage Review Tracker has also been prepared by Sustainable Construction Services. The proposal aims to achieve a Very Good rating BREEAM Assessment.
- 6.16 The Energy Strategy confirms that the energy hierarchy has been followed by:
- Be Lean: A fabric first approach where the design considers the building form and fabric to provide a highly efficient envelope and drive down the energy demand for heating. The building services plant and equipment has been specified to be as efficient as practical to drive down energy consumption. These measures alone show an improvement to of 22% when compared with the Notional Building.
 - Be Clean: There are no heat networks in the immediate vicinity and contact has been made with the nearest network operator to establish the possibility of extending the network. Provision has been made for a future heat network connection.
 - Be Green: low carbon and renewable technologies have been appraised in terms of technical, physical and financial feasibility for use on the project. Air source heat pumps and roof mounted photovoltaic panels are considered to be the most favourable for the development. These measures will provide a reduction of an additional 33% in CO₂ emissions.
- 6.17 The Energy Strategy concludes that the overall predicted reduction in CO₂ emissions from the Baseline for the proposed development is 55%. This equates to an annual saving of approximately 5.2 tonnes of CO₂.
- 6.18 Accordingly, the proposal is in accordance with LBS Local Plan Policy 31 and LP Policy SI2 and will in fact achieve a reduction in CO₂ emissions beyond the policy requirement for major developments.

Noise

- 6.19 London Plan Policy D14 requires development proposals to manage noise by avoiding significant adverse noise impacts on health and quality of life, mitigating and minimising the existing and potential adverse impacts of noise.
- 6.20 Policy 29 of the Sutton Local Plan states that the Council will not grant planning permission for any development that adversely affects the amenities of future occupiers or those currently occupying adjoining or nearby properties, regarding considerations of overlooking, outlook, light, noise and vibration, traffic movement amongst other things.
- 6.21 The nature of the application proposal will not give rise to impacts associated with overlooking, outlook or light. A Noise Impact Assessment has been submitted as part of this application to assess the potential impact of the proposal on nearby noise sensitive receptors. The Assessment concludes that the noise from the units demonstrates a low potential for impact on the neighbours from both an operational traffic flows perspective and in relation to the mechanical plant (including the air conditioning condensers, air handling unit (AHU) ducts and an external condenser for the server room). The assessment has been carried out with a 'no screening effect' and with plant operating at 24 hours to test the worst-case scenario. Accordingly, the proposal will comply with LP Policy D14 and Sutton Policy 28.

Air quality

- 6.22 London Plan Policy SI1 states that development proposals should not lead to further deterioration of existing poor air quality, create new areas that exceed air quality limits, not create unacceptable risk of high levels of exposure to poor air quality. Local Plan Policy 34 requires development to be at least ‘air quality neutral’ and to seek to contribute towards the achievement of national air quality objectives as far as possible.
- 6.23 The application is accompanied by an Air Quality Assessment to assess the proposals and demonstrate compliance with this policy. The proposed development will utilise an all-electric energy strategy via renewable technologies (which may include air source heat pumps (ASHPs) and will include solar PV panels); as such, there will be no point sources of emissions within the proposed development. The proposal will not result in a significant effect upon local air quality arising from changes to traffic flows. The proposed development has also been shown to meet the London Plan and Local Plan requirement that new developments are at least ‘air quality neutral’. The proposal is therefore policy compliant from an air quality perspective.

Trees and landscaping

- 6.24 The London Plan states that development proposals must provide spaces and buildings that maximise opportunities for urban greening (Policies D3 and G5). LBS’s Local Plan Policy 28 states that new development, where appropriate, should make provision for suitable new planting, trees and boundary treatments. Policy 28 also requires a landscaping scheme to be submitted alongside a planning application whereby existing trees are present on site, or where existing trees are proposed to be felled.
- 6.25 The Arboricultural Constraints Assessment and Tree Constraints Plan shows that there are eight trees within the site or at the site’s boundary (behind the warehouse). Six of these are U-value trees and two are C-value (Sycamore and Buddleia). Three U-value trees are proposed to be removed as part of the proposal due to the poor quality of the trees.
- 6.26 A total of 123 shrubs and 65 climbers are proposed to be planted in the scheme overall, comprising enhanced greening of the site compared to the existing situation. The proposal therefore aligns with the abovementioned London Plan and Local Plan policies.

Flood risk/drainage

- 6.27 The London Plan seeks to ensure that flood risk is minimised and mitigated, and that residual risk is addressed for new development proposals (Policy SI12). LP Policy SI13 and Local Plan Policy 32 also seek to ensure that surface water run-off is managed as close to its source as possible, with a preference for green over grey features.
- 6.28 A Sustainable Drainage Strategy is being developed by Lyons O’Neill as part of the detailed design process. A Sustainable Urban Drainage Strategy has been submitted as part of the planning application to summarise this. The application site is within Flood Zone 1 (at low risk of flooding), and the proposal is ‘minor’ and does not propose new subterranean levels. Therefore, a Flood Risk Assessment is not required for the application.
- 6.29 As part of the detailed design stage, surface water flood risk will be assessed by developing a hydraulic model that simulates storm events with a 1 in 100-year return period include a

+40% climate change allowance. Regarding the drainage hierarchy set out in the London Plan, options for Sustainable Drainage System (SuDS) measures will be considered as part of the detailed design stage.

- 6.30 Hydraulic calculations will be undertaken to demonstrate peak run-off rates for the 1 in 100 return period +40%CC. However, it is not feasible for this scheme to achieve greenfield run-off rates for the site. Based on a site area of c. 8.7ha the greenfield runoff rate would be ~4.5l/s for the 1 in 100-year return period. To restrict the sitewide runoff rate to 4.5l/s, a Quick Storage Estimate undertaken in MicroDrainage suggests between 660m³ and 860m³ of attenuation would be required. Due to the site's nature, there is limited scope for attenuation features other than below ground storage tanks, and there is also a large diameter (1950mm) Thames Water sewer running diagonally across the northern car park, which restricts where below ground storage features can be constructed. Therefore, it is recommended by Lyons O'Neill that surface water is allowed to discharge off-site unrestricted, but existing surface water connections to the private foul network are made redundant and all surface water is connected to the private surface water network.
- 6.31 Once the levels strategy has been worked up for the site (at detailed design stage), calculations will be undertaken to assess the 1 in 30-year rainfall event (plus 40% for climate change) and the 1 in 100-year event.
- 6.32 Accordingly, the proposed drainage strategy for the site is being prepared in accordance with the aims of LP Policy SI13 and Local Plan Policy 32.

Fire safety

- 6.33 London Plan Policy D12 requires all development proposals to achieve the highest standards of fire safety and ensure that they identify suitably positioned unobstructed outdoor space for fire appliances/evacuation space, are designed to incorporate appropriate safety features, provide suitable means of escape, and have a robust strategy for evacuation.
- 6.34 As the proposal is for minor development and comprises the refurbishment of the existing warehouse, a full Fire Statement is not required for the planning application. A Fire Safety Strategy has been prepared by the project's Fire Engineer (Osborn Associates), as requested at pre-application stage, and is appended to the DAS. It confirms that the proposed alterations to the warehouse will achieve compliance with the required standards. The evacuation strategy employed in the building will be simultaneous evacuation, where the entire building is evacuated immediately upon receiving an evacuation signal or instruction. The building perimeter is surrounded by a footpath which affords access from any final exit to the hardstanding outside the front of the building. Further design recommendations in the Fire Strategy will be incorporated into the next design stage. Accordingly, the proposal aligns with LP Policy D12.

7.0 Conclusion

7.1 The proposal within this planning application has been subject to pre-application discussions. The proposal will allow the site to be used as depot for LBS's fleet of waste collection and street cleansing vehicles.

7.2 The proposal:



- 1 Does not propose a material change of use and therefore is acceptable in principle;
- 2 Would be acceptable from a design perspective and would be in keeping with other developments within the Beddington Lane SIL;
- 3 Would be acceptable from a transport/highways perspective. The layout of the site and additional proposed access points will enable more efficient movement of vehicles around the site. New parking arrangements will result in fewer staff vehicles parking in nearby roads and EV charging points will be provided. Enhanced pedestrian access and cycle parking will be provided as part of the scheme;
- 4 Will achieve a reduction in CO₂ emissions beyond the policy requirement for major developments;
- 5 Would have a low potential for noise impact on the neighbours;
- 6 Will not result in a significant effect upon local air quality arising from changes to traffic flows and will be air quality neutral;
- 7 Will result in urban greening via a soft landscaping scheme;
- 8 Will have an appropriate drainage strategy; and
- 9 Will incorporate fire safety precautions.

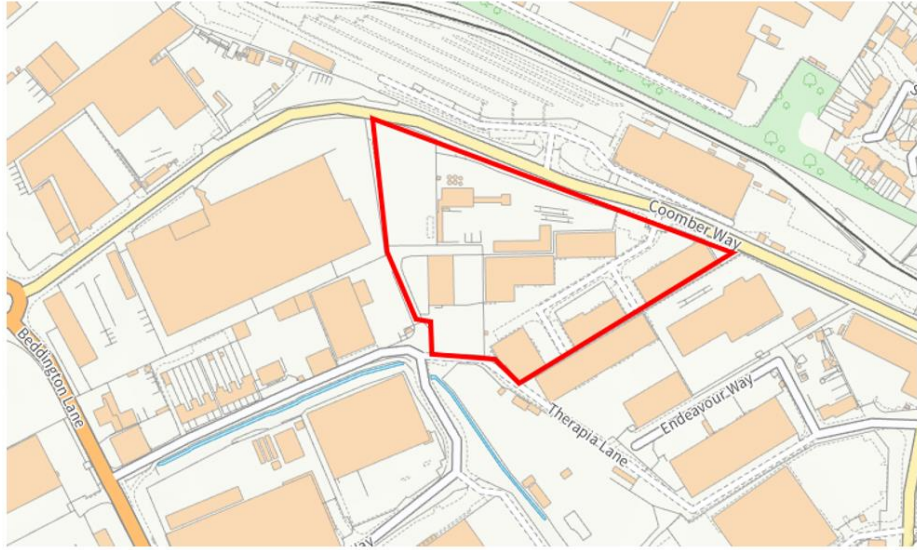
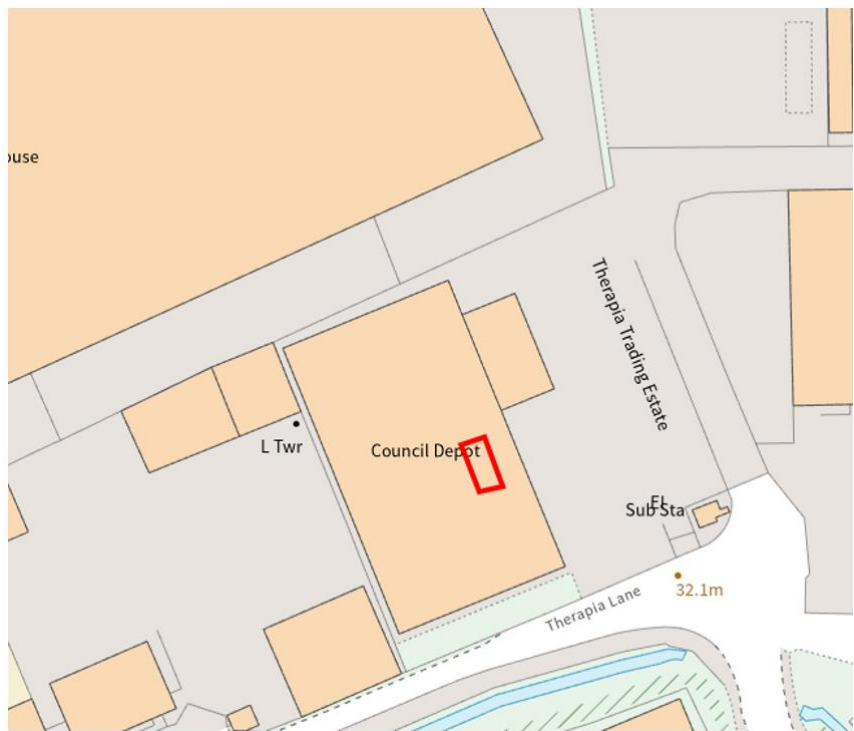
7.3 As we have demonstrated in this Planning Statement, the application proposal accords with the Statutory Development Plan and should therefore be granted planning permission without delay. There are no other material considerations which indicate otherwise.

Appendix 1 Planning History

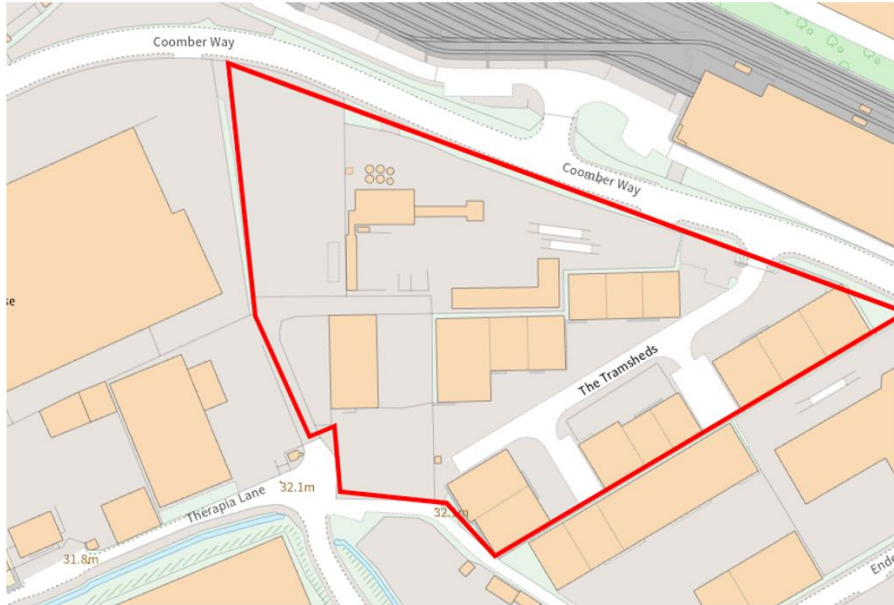
Application site

1.1 See red-line boundary plans added to each application for ease of reference (as some of the applications span over neighbouring sites):

Application Reference	Description	Status
79/19802	<p>Sandlex Works, Therapia Lane</p> <p>Erection of a building for warehouse purposes.</p> 	Granted 05.12.1979.
N1990/35119	<p>Therapia Trading Estate</p> <p>Erection of a building for industrial/warehouse purposes with ancillary office facilities falling within Classes B2 and B8 of the Town and Country Planning (Use Classes) Order 1987 with car parking facilities.</p> 	Withdrawn 02.01.1992.

<p>N1992/36776</p>	<p>Therapia Trading Estate</p> <p>Erection of a building for industrial purposes with ancillary storage and office accommodation over together with car parking facilities.</p> 	<p>Granted 02.06.1993.</p>
<p>N1993/38112</p>	<p>Unit 1, Therapia Trading Estate</p> <p>Provision of an M.O.T testing station.</p> 	<p>Granted 28.01.1994.</p>
<p>N1995/39371</p>	<p>Therapia Trading Estate</p>	<p>Granted 18.05.1995.</p>

Re-cladding of existing building, use of adjoining open area as a yard and provision of car parking facilities.



D1999/45013

Digginwell, Therapia Trading Estate

Use of land as an urban roadstone coating centre comprising factory building, aggregate storage bays, control room weighbridge with ancillary office, plant and associated facilities together with car parking and new access.

Granted
05.05.2000.



D2000/46031

Digginwell, Therapia Trading Estate.

Use of land as an urban roadstone coating centre comprising aggregate storage bays, control room weighbridge with ancillary offices, plant and associated facilities, together

Granted
12.06.2000.

with car parking facilities and new access (amendment to previously approved App. No. 99/45013/FUL).

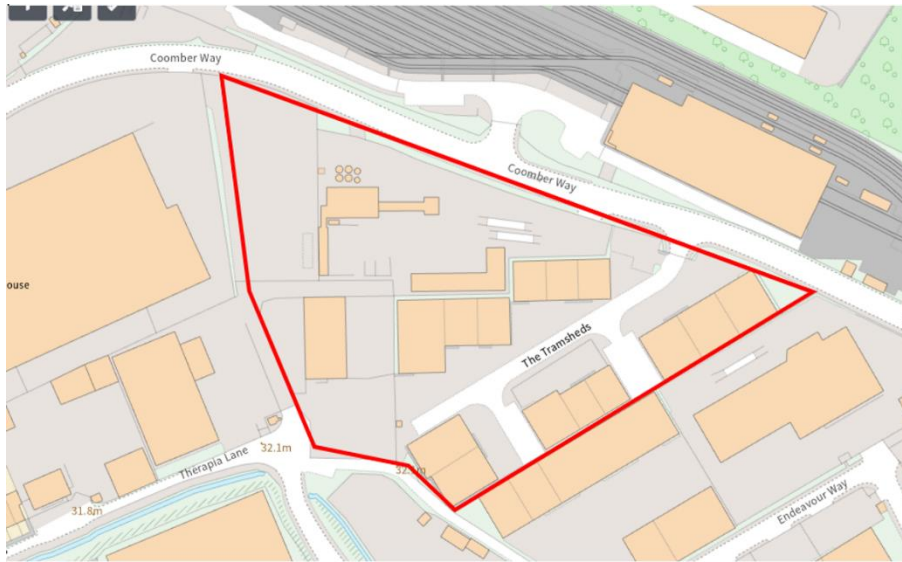


D1998/43972

Therapia Trading Estate

Formation of new access.

Withdrawn
28.07.2000.

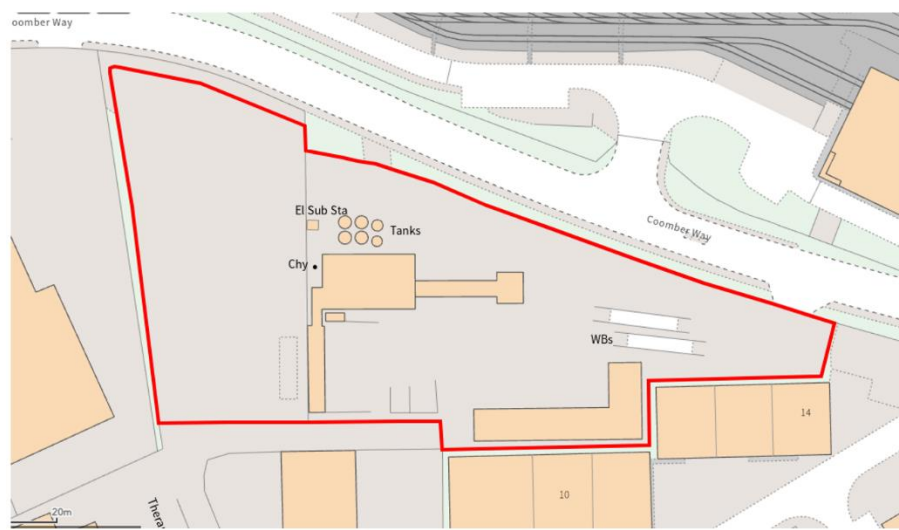


D2002/48838

Aggregate Industries Ltd, Coomber Way

Use of premises for the utilisation and dispatch of asphalt at any time during the day or night for up to 40 occasions per annum over a 12 month period (variation of Condition 16 of previously approved App. No. Doo/46031/FUL).

Granted
04.11.2003.

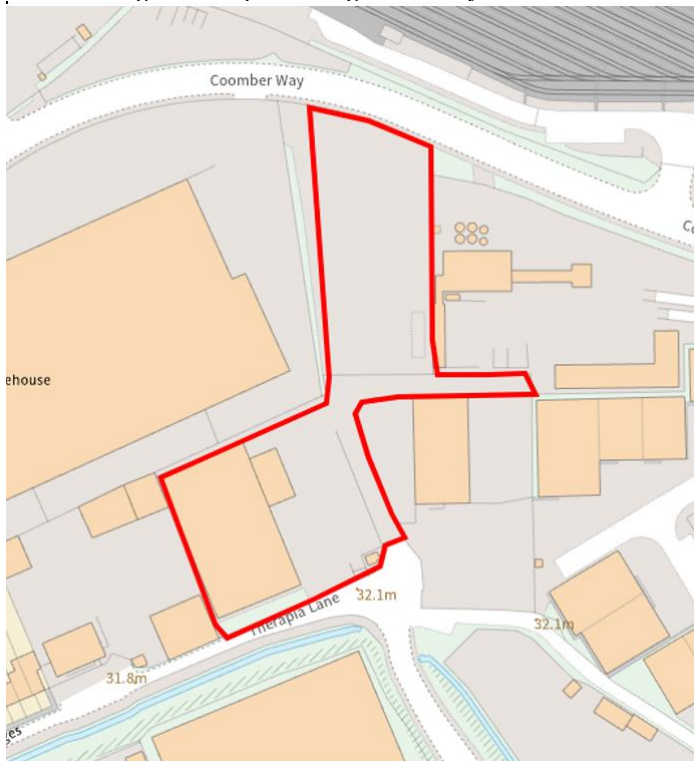


D2006/56727


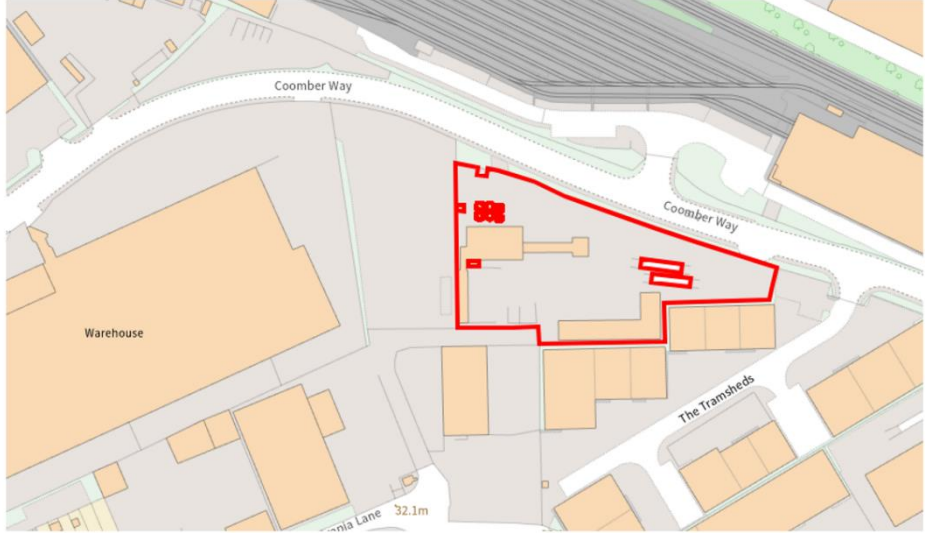
Council Depot Unit 1 Therapia Lane

Refurbishment to depot incorporating new window at ground floor, relocation of fuel storage tank, provision of new bund wall for existing and proposed fuel tank, new hardstanding and a 2.4 metre high boundary fence.

Granted
26.11.2007.



Neighbouring sites

Application Reference	Description	Status
79/18925	<p>Beddington Works, Therapia Lane</p> <p>Erection of garage and store building.</p> 	Granted 19.04.1979.
87/30758	<p>Snowcem PMC Ltd, Therapia Lane</p> <p>Erection of a single-storey extension powder plant to provide additional workshop toilet and mess room facilities.</p> 	Granted 27.01.1988.
84/26648	<p>Blue Circle Industries, Therapia Lane</p>	Granted 16.07.1984.

Extension to existing paint spray building to house equipment for use in connection with paint product and manufacture.



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