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| Committee Date | 13.06.2024 | |
| Address | London Borough Of Bromley Waldo Road Bromley BR1 2QX | |
| Application Number | 24/00182/FULL1 | Officer - Susanna Stevenson |
| Ward | Bromley Common And Holwood | |
| Proposal | Erection of a fire suppression tank and pump house along with associated drainage works, replacement/repair of slab, push walls, weighbridge and other works associated with improvement of existing waste transfer station including fencing. | |
| Applicant | Agent | |
| c/o Agent | Tarun Cheema | |
| Civic Centre Stockwell Close Bromley BR1 3UH | 104C St. John Street London EC1M 4EH United Kingdom | |
| Reason for referral to committee | Council land - outside delegated powers | Councillor call in |

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| RECOMMENDATION | PERMISSION BE GRANTED |
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| <p>KEY DESIGNATIONS</p> <p>Area of Deficiency in Access to Nature Article 4 Direction Biggin Hill Safeguarding Area Flood Zone 2 Flood Zone 3 Gas Holder Stations Historic Flooding Historic Landfill Sites London City Airport Safeguarding</p> |
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Ravensbourne Variations
 Renewal Area
 River Centre Line
 Smoke Control SCA 13
 Smoke Control SCA 12

Land use Details

| | Use Class or Use description | Floor space (GIA SQM) |
|----------|--|-----------------------|
| Existing | Council waste/recycling centre and depot | N/A |
| Proposed | Council waste/recycling centre and depot | N/A |

Representation summary

The application was advertised by way of a site notice.

 Letters were sent to neighbouring residents/properties on 12th February 2024.

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|---------------------------|---|
| Total number of responses | 0 |
| Number in support | 0 |
| Number of objections | 0 |

1. SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The proposal would provide site enhancements to improve the efficiency and fire safety of the site
- While the development would be close to an existing river, no objections are raised by the Environment Agency
- The works to the site would be of a design and appearance consistent with the function and character of the site – the proposal would not have a detrimental impact on visual amenity
- There are no technical objections with regards to drainage and highways matters
- The proposal would not result in an intensification of, or change to, the use of the site and would not give rise to greater impact on residential amenity
- There are no objections to the proposal from an Environmental Health perspective

2. LOCATION

2.1 The application site comprises a waste/recycling site operated by the London Borough of Bromley. It lies to the south of Network Rail railway land, to the west of The Avenue, to the north of allotment land (Urban Open Space) fronting Baths Road and to the east of residential streets (Carlyle Avenue and Walwyn Avenue). The site lies within Flood Zones 2 and 3 and a culverted main river crosses the site.

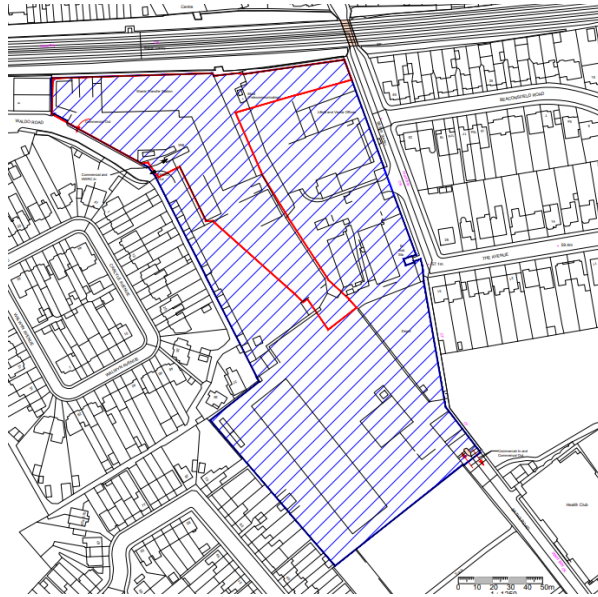


Figure 1 – site location plan

2.2 The red line application site is accessed from Baths Road (to the south – no public access) and from Waldo Road (to the north west – includes public access to the recycling centre). The area shaded blue comprises the wider central depot site, which is owned/operated by the London Borough of Bromley.



Figure 2 – Aerial view

3. PROPOSAL

3.1 The proposal relates to the following development:

- Erection of fire suppression tank and pump house
- Drainage works
- Repair and replacement to slab and push walls
- Weighbridge works
- Fencing

3.2 Erection of fire suppression tank and pump house

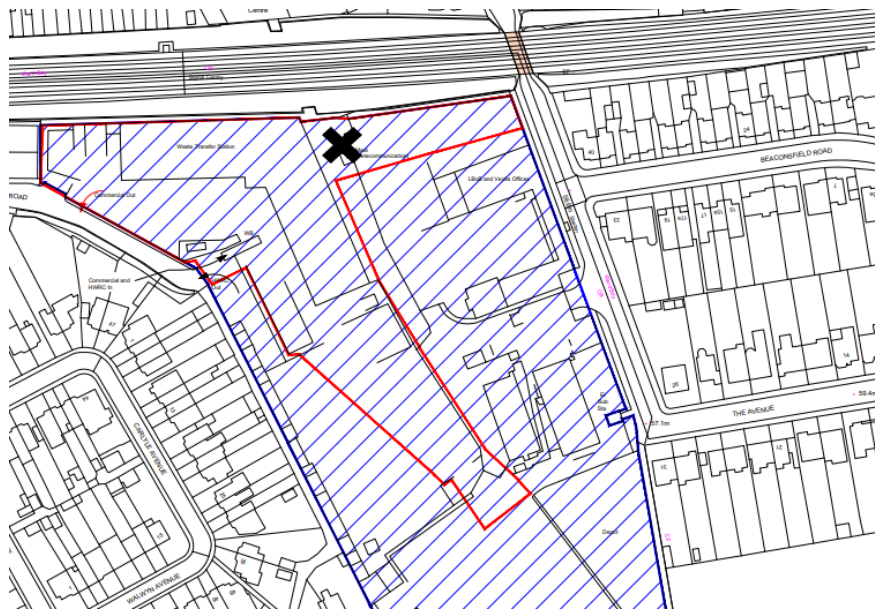


Figure 3 – Site plan with location of tank/pumphouse “X”

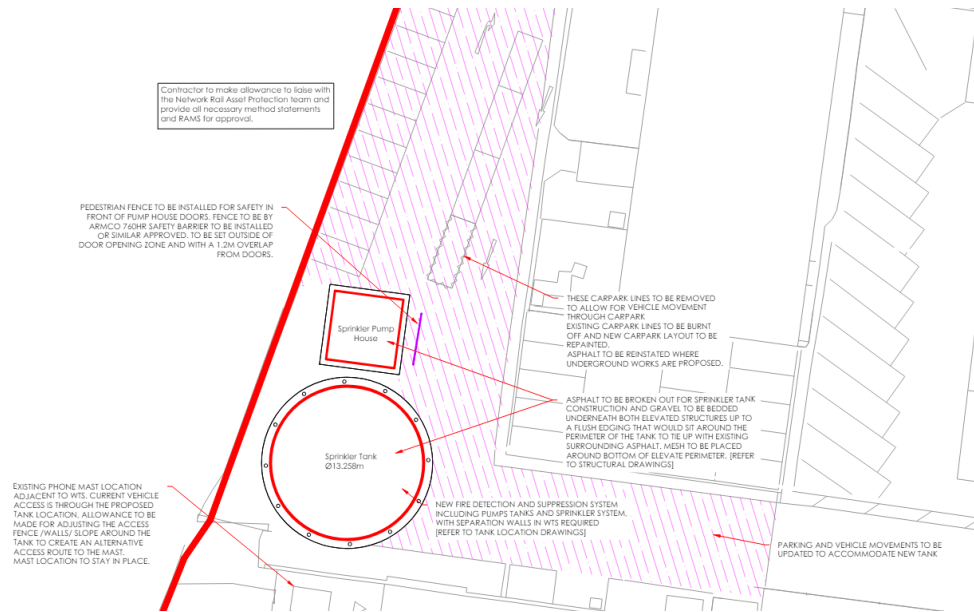


Figure 4 – Detailed plan of location of fire suppression tank/pump house

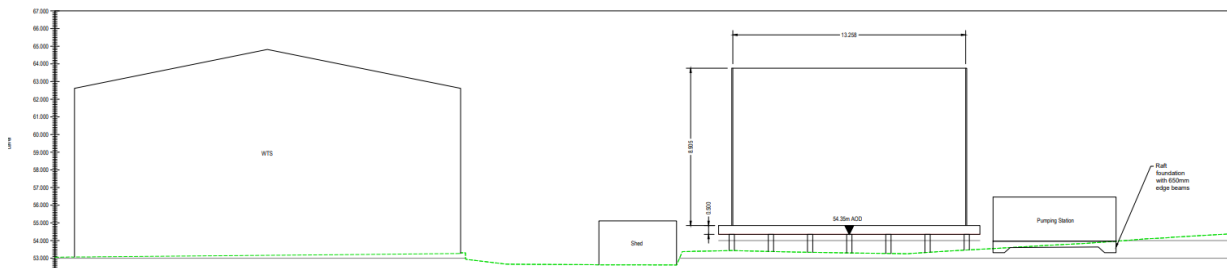


Figure 5 – Elevation of fire suppression tank/pump house



Figure 6- view to northern boundary and location of proposed tank/pump house

3.2.1 The fire sprinkler tank comprises a cylindrical structure which would hold water for the purpose of addressing fire events at the depot. The tank would be mounted on a raft foundation with a gantry frame positioned on pad foundations to support the pipe leading from the pump house to the sprinkler valve room.

3.2.2 The fire suppression tank and pump house would be located in the northern part of the site, adjacent to the northern boundary of the site with the railway land and to the west of the main waste sorting hangar. The painted car parking bays associated with the Council Depot offices, accessed from The Avenue, would be amended to include the removal of one painted bay (to enable continued vehicular circulation through the private part of the site – no public access).

3.3 Drainage and below surface works

3.3.1 Sitewide drainage works are proposed in association with the hangar and waste sorting area to the north west side of the site. These will be underground and include works to the foul water drainage system and the formation of ACO channels. Future electric vehicle charging ducts will be laid.

3.4 Repair and replacement to slab, pavements and push walls

3.4.1 The existing concrete waste storage bays are separated by “push walls” which are used to assist in the moving and sorting of waste. These are proposed to be repaired where suitable, and replaced where necessary, with similar structures formed of pre-cast concrete “lego” blocks. The existing external yard slab will be removed and replaced on a like-for-like basis, with kerbs and “island” amended to improve the flow of vehicles through the waste site and to allow for the re-siting of the existing sentry box relative to the repositioned weighbridge. The existing pedestrian access will be lengthened through the removal of an existing brick wall to the north of the public in/out access to the recycling centre.



Figure 7 – Facing north west



Figure 8 – Facing north east



Figure 9 – Facing south east

3.5 Weighbridge works

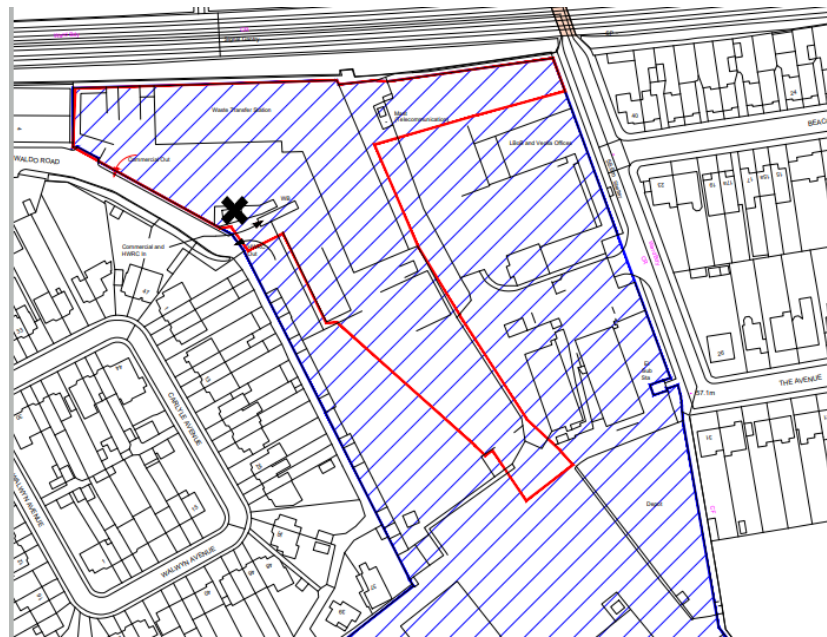


Figure 10 – Location of replacement weighbridge, removed wall and pavement works

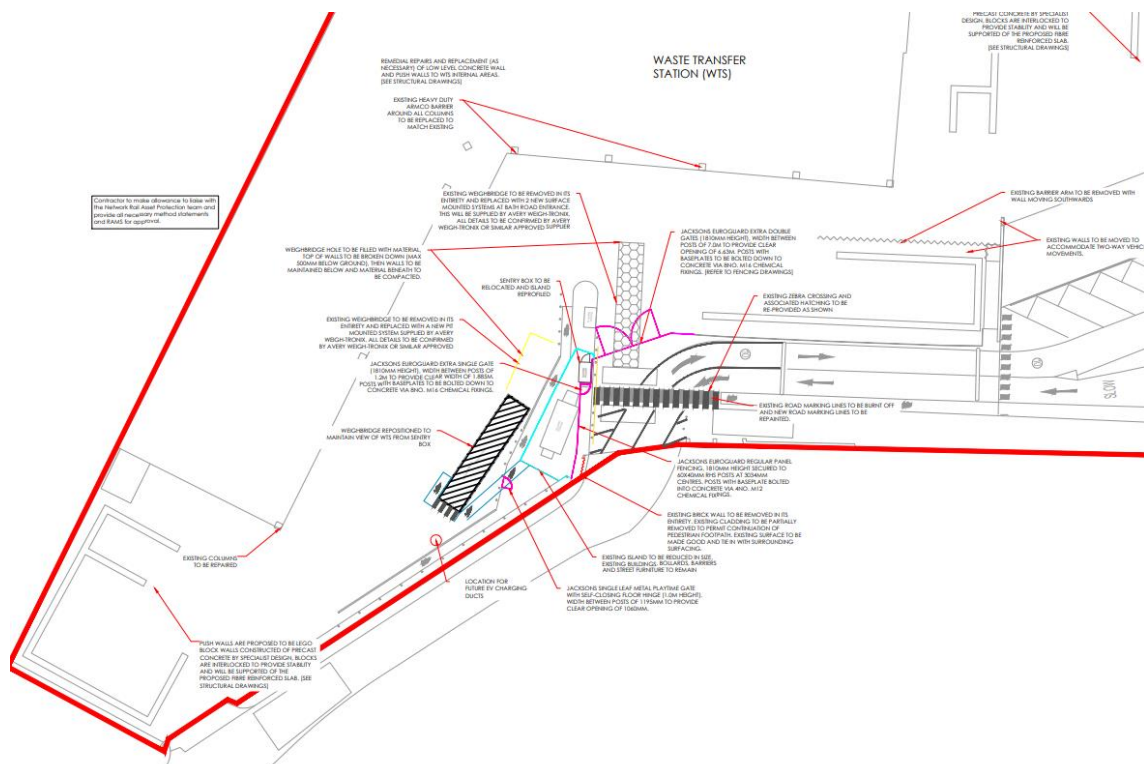


Figure 11 – Proposed replacement weighbridge (hatched in black) positioned to south west of existing location (yellow line)



Figure 12 – existing weighbridge

3.5.1 This application includes reference to the provision of 2 no. new weighbridges as well as the replacement and repositioning of the existing weighbridge on the southern side of the site. Members are advised that separate to this application, an application was submitted by Veolia (rather than LBB) under reference 24/00343/FULL1 for the provision of 2 no. weighbridges to the southern side of the site, and this was granted planning permission by members of the Plans Sub-Committee meeting held on 18th April 2024.

3.6 Fencing and gate

3.6.1 Within the site (i.e. not at the site boundaries) fencing/gates are proposed to be installed between the public access and waste sorting/storage hangar and associated weighbridge/manoeuvring area.

3.7 The application has been submitted with the following supporting documents:

- Covering letter
- Design and Access Statement
- Fire pump details
- Pre-application drainage report
- Phase 2 Geo-Environmental Report parts 1, 2 and 3
- Planning Statement
- Ecology letter
- Flood Risk Assessment

4. RELEVANT PLANNING HISTORY

88/04397/LBB - Alteration to layout of solid waste transfer station including additional floodlighting the replacement of an existing office with a portakabin the installation of rail – Permitted

90/02780/LBB - Enclosure of refuse transfer operation and environmental improvements – Permitted

01/00544/DEEM3 - Vertical composting unit on concrete bund (CIVIC AMENITY SITE) – Permitted

19/00437/FULL1 - Demolition of existing single storey outbuildings and strengthening works to existing retaining wall including partial replacement and repairs – Permitted

24/00343/FULL1 - Installation of 2 no. below ground weighbridges and associated kiosk - Permitted

5. CONSULTATION SUMMARY

A) Statutory

Network Rail - No objection

Informatives recommended should permission be granted, with regards to works near the railway asset.

Environment Agency - No objection

Subject to conditions, including with regards to piling, foul and surface water drainage connections, and contamination risk.

Highways - No objection

While a parking bay within the Council office part of the site would be removed to allow for manoeuvring of vehicles adjacent to the fire suppression tank, there is sufficient remaining car parking capacity.

Environmental Health (Pollution) - No objection

Subject to condition relating to the submission of information on noise associated with the fire suppression system.

Drainage - No objection

B) Local Groups

No comments received.

C) Adjoining Occupiers

No comments received.

6. POLICIES AND GUIDANCE

National Planning Policy Framework 2023

NPPG

The London Plan

D3 Optimising site potential through the design-led approach

D11 Safety, security and resilience to emergency

D14 Noise

G1 Green infrastructure

G5 Urban greening

G6 Biodiversity and access to nature

SI 1 Improving air quality

SI 5 Water infrastructure

SI 9 Safeguarded waste sites

SI 12 Flood risk management

SI 13 Sustainable drainage

SI 17 Protecting and enhancing London's waterways

T1 Strategic approach to transport

T2 Healthy Streets

T4 Assessing and mitigating transport impacts

T5 Cycling

T6 Car parking

T7 Deliveries, servicing and construction

Bromley Local Plan 2019

32 Road Safety

37 General Design of Development

79 Biodiversity and Access to Nature

114 New Waste Management Facilities and Extensions and Alterations to Existing Sites

115 Reducing Flood Risk

116 Sustainable Urban Drainage Systems (SUDS)

117 Water and Wastewater Infrastructure

- 118 Contaminated Land
- 119 Noise Pollution
- 120 Air Quality
- 122 Light Pollution
- 123 Sustainable Design and Construction
- 124 Carbon Reduction, Decentralised Energy Networks and Renewable Energy
- 125 Delivery and Implementation of the Local Plan

Supplementary Planning Guidance

Urban Design Guide (Bromley, 2023)

7. ASSESSMENT

7.1 Land use - ACCEPTABLE

- 7.1.1 The proposal would make varied alterations to the site, all entirely associated with the established use of the site as a waste/recycling facility.
- 7.1.2 Policy 114 of the Bromley Local Plan relates to extensions and alterations to existing waste management facilities. It states that new or extended/altered facilities must demonstrate that they will not undermine the local waste planning strategy and will help the Borough move up the waste hierarchy.
- 7.1.3 London Plan Policy SI 8 (Waste capacity and net waste self-sufficiency) relates principally, in terms of the assessment of planning applications, to proposals for new waste sites and/or increased capacity of existing waste sites. Policy SI 9 relates to safeguarded waste sites and states that existing waste sites should be safeguarded and retained in waste management use. The intention of the application proposals is to improve the existing operation of the site, including enhanced drainage, replacement slab and fire suppression systems, as well as other measures associated with increasing the effectiveness of the use of the site.
- 7.1.4 The submission confirms that the proposals would not increase capacity at the site or expand it, such that would potentially attract additional visits or vehicle movements.

7.2 Design, Scale and Layout - ACCEPTABLE

- 7.2.1 Paragraph 126 of the NPPF (2021) states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 7.2.2 London Plan and Bromley Local Plan policies further reinforce the principles of the NPPF setting out a clear rationale for high quality design. Policy D3 of the London Plan states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. Form and layout should

enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape. The quality and character shall respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character. locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character.

- 7.2.3 Much of the work proposed at the site relates to alterations at or below ground level to provide drainage and services improvements, or to the repair and/or replacement of existing structures/buildings to lengthen their lifetime and structural integrity. Exceptions to this comprise the new raised fire suppression tank and pump house. These would be inherently utilitarian and functional in their appearance, which is considered appropriate in the context of the site's character and longstanding use. While the proposed fire suppression tank would be approx. 8.9m high, it would be sited sensitively in context with the raised adjacent railway line and approx. 66m distant from the boundary of the site with The Avenue. It would be viewed from the public realm of the neighbouring street against the backdrop of the large waste hanger. The water tank would be visible from the railway line to the north of the site, but its appearance and scale would be entirely in context/characteristic of the general appearance and function of the host waste site.

7.3 Neighbouring amenity - ACCEPTABLE

- 7.3.1 Policy 37 of the Bromley Local Plan seeks to protect existing residential occupiers from inappropriate development. Issues to consider are the impact of a development proposal upon neighbouring properties by way of overshadowing, loss of light, overbearing impact, overlooking, loss of privacy and general noise and disturbance.
- 7.3.2 No objections are raised by the Environmental Health Officer with regards to the pump house/fire suppression system works, on the basis that the pump will only operate infrequently. The pump will need to be periodically tested and a condition has been recommended should planning permission be granted which requires the submission of an acoustic assessment, and defines maximum noise levels that would be acceptable.
- 7.3.3 No representations have been received in relation to the proposals, which other than the installation of the fire suppression system would be largely confined to the area of the site at the head of the vehicular access from Waldo Road, and which generally comprise low level or below ground works associated with the continued (not intensified) use of the site.

7.4 Transport and highways - ACCEPTABLE

- 7.4.1 The proposal would not increase the intensity of the use of the site or the number of trips to and from it. The proposal relates to the maintenance and enhancement of the existing site infrastructure, including drainage, underground services and structures, as well as the provision of necessary fire suppression systems to assist in addressing fire risk. As such, it is not considered that there are any significant transport and

highways implications associated with the proposals. No technical highways objections have been raised in respect of the proposal. Although it is noted that the proposal would involve the removal of 1 no. car parking bay located close to the proposed sprinkler tank, it is noted that there is adequate car parking provision within the wider site generally to serve the needs of the Council and Veolia offices located at the site.

7.5 Flooding and drainage - ACCEPTABLE

- 7.5.1 The National Planning Policy Framework states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, and where development is necessary, by making it safe without increasing flood risk elsewhere. The Technical Guidance published alongside the Framework details that for these purposes, areas at risk of flooding constitute land within Flood Zones 2 and 3.
- 7.5.2 The application has been submitted with a Flood Risk Assessment which includes reference to the Sequential Test, noting that the proposal is for minor changes to an existing site, where there are not considered to be any reasonably available alternative sites within Flood Zones 1 and 2. This rationale is accepted, in view of the integral relationship between the development proposed (the weighbridges and kiosk) and the wider, longstanding and established use of the site as a Council depot, waste transfer and household re-use and recycling centre. It is stated that it is more practical and sustainable from a wider planning perspective to keep the site in its current location, and enhance those existing facilities, rather than to move the facilities elsewhere, noting that the site would not be useful for redevelopment due to the flood risk of the site.
- 7.5.3 With regards to the vulnerability of this specific development to flooding, the use of the site would be considered “less vulnerable.”
- 7.5.4 Comments were sought from the Environment Agency and from Thames Water.
- 7.5.5 With regards to the impact of the proposal on the culverted river, flood risk and the ground water protection zone, the Environment Agency has raised no objections to the proposals subject to conditions relating to groundwater and land contamination (remediation strategy and verification), piling, connection to foul and surface water sewers systems, and informatives relating to pollution prevention and removal/disposal of soil.
- 7.5.6 The Council’s Drainage Officer has confirmed that they have no objection to the proposals.

8. CONCLUSION

- 8.1 The proposal would have no significant impact on neighbouring residential amenity, nor on the visual amenities or character of the site and surroundings.

- 8.2 Subject to conditions, there are no objections to the proposals from the perspective of the Environment Agency. It is not considered that the proposal would give rise to increased risk of flooding or damage to the culverted watercourse.
- 8.3 The proposal would not result in an intensification of the activities on the site, and there are no objections from a technical highways or environmental health perspective.
- 8.4 The proposed development would provide enhanced fire suppression capability and would repair/maintain/improve the existing pedestrian access to the access-controlled waste sorting and loading areas. The drainage infrastructure would be improved and the proposal includes basic repair and replacement of existing structures so as to enhance and lengthen the operational efficiency of the application site, which is a designated waste transfer site.
- 8.5 It is recommended that planning permission be granted.

RECOMMENDATION: Application Permitted

Subject to the following conditions:

1. **Time limit for commencement**
2. **Accordance with approved plans**
3. **Construction management plan pre-commencement**
4. **Contamination risk strategy pre-commencement**
5. **Remediation verification report pre-occupation**
6. **Process should new contamination be discovered**
7. **No piling without express consent**
8. **Foul/surface water connection details pre-commencement**
9. **No drainage systems for infiltration other than with consent**
10. **Materials to match existing**

Informatives:

1. **Flood Risk Activity Permit required**
2. **Disposal of soil – subject to waste management legislation**
3. **Network Rail asset protection informative(s)**

And delegated authority be given to the Assistant Director: Planning & Building Control to make variations to the conditions and to add any other planning condition(s) as considered necessary.