Crossness Sewage Treatment Works
in the London Borough of Bexley
planning application no.10/01464/FULM

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<th>Strategic planning application stage 1 referral (new powers)</th>
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<th>The proposal</th>
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<td>Enhancement of the sewage sludge digestion facility, through the installation of a thermal hydrolysis plant (THP), and associated access and site infrastructure.</td>
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<th>The applicant</th>
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<td>The applicant is Thames Water Utilities Ltd., and the architect is John Lyall Architects Ltd.</td>
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<th>Strategic issues</th>
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<td>The principle of enhancing sewerage infrastructure within an existing sewerage treatment works is supported, and the scheme is broadly acceptable in strategic planning terms. Notwithstanding this, further work and discussion is required in relation to air quality, noise, sustainable development and transport before the application is referred back to the Mayor.</td>
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<th>Recommendation</th>
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<td>That Bexley Council be advised that while the application is generally acceptable in strategic planning terms the application requires further work in order to comply with the London Plan for the reasons set out in paragraph 73 of this report, however, the possible remedies set out in paragraph 75 of this report could address these deficiencies.</td>
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Context

1. On 6 September 2010 the Mayor of London received documents from Bexley Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 15 October 2010 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor’s use in deciding what decision to make.

2. The application is referable under Category 1C(1.a) and 2B(1.b) of the Schedule to the Order 2008:
“Development which comprises or includes the erection of a building more than 25 metres high and is adjacent to the River Thames”

“Waste development to provide an installation with capacity for a throughput of more than 50,000 tonnes per annum of waste; produced outside the land in respect of which planning permission is sought”

3 Once Bexley Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 Crossness Sewage Treatment Works (STW) is located on the Bexley riverside, close to the eastern edge of Greater London. The site is situated on the River Thames defended floodplain which comprises a flat, low-lying landscape, characterised by industrialised forms and various open spaces.

6 The STW covers an area of approximately 78.6 ha with the application site involving an area of 4.8 ha within this wider site, see figure 1 below. The operational core of the STW is characterised by typical sewage treatment infrastructure with substantial areas of plant, machinery, tanks and buildings, including the distinctive sludge powered generator.

Figure 1, Crossness STW (application site boundary in red). Source: Thames Water

7 Along the northern boundary of the site is the Thames Riverside Path, which provides pedestrian and cycle access, and offers viewpoints over the river. Immediately to the east of the STW is the Crossness Nature Reserve, while to the south is the A2016 (Eastern Way), Crossness Southern Marshes and Veridion Business Park. To the west of the STW is an area of public open space and the Crossness conservation area which comprises a number of workshop buildings and engine houses representing the historic core of the Crossness STW along with the Grade I listed Beam Engine House. Beyond the conservation area is a public golf course which defines the eastern fringe of the Thamesmead North residential area.
The nearest railway station is Abbey Wood, located approximately two km away from the site. Four bus routes serve the area, although none of the respective bus stops are located within acceptable walking distance of the site. Given the significant lack of public transport facilities nearby, the public transport accessibility level (PTAL) cannot be calculated for this site, but could be considered to be nil, or extremely poorly accessible.

Details of the proposal

The proposed development would take place entirely within the operational boundary of the site. The proposals include the refurbishment of six existing primary digesters and the redevelopment of part of the site occupied by six uncovered redundant secondary digesters in the north of the STW, adjacent to the River Thames.

It is proposed that the new sludge treatment infrastructure will include the following:

- Two blending tanks
- Four strain presses and strain press gantry
- Thermal hydrolysis plant (THP)
- Two THP feed silos and motor control centre
- Heat exchangers and recirculation pumps
- Digesters switchboard kiosk and transformers
- Heating building, heating building transformers and flue stack of 45 m in height
- Three Combined heat and power plants (CHP) and three waste heat dump fans
- Two belt press feed tanks
- Sludge cake storage and dewatering building with stacks of 35 m in height
- Waste gas burner
- Odour control unit with stack of 35 m in height
- Siloxane filter
- Six biogas holders mounted on refurbished digesters
- Internal access road
- Above and below ground pipework

The “enhanced” element involves a thermal hydrolysis process (THP), by which the sludge is subjected to very high temperatures and pressure by the injection of pressurised steam, before being pumped into the digestion tanks to undergo anaerobic digestion. This improves the digestion process and reduces the production of residual sludge cake that needs to be transported and recycled to agricultural land. This THP process is now installed, or being installed, at some twenty sites throughout Europe, including eight in the UK.

Digested sludge is said to be preferred by farmers to undigested limed sludge, because it is easier to recycle than limed sludge; its neutral pH allows spreading across a wider variety of soil types and it produces an output with less volume and odour. The enhanced digestion process also generates more green energy (biogas) than conventional digestion.

The application also includes a small area of land that forms the eastern boundary of the Crossness conservation area and is also designated as Metropolitan Open Land (MOL). The land is included for landscaping improvements and no structures or plant are proposed within this area.

Case history

On 11 April 2008 the Mayor was consulted on an extension to the existing sewage treatment works to include additional buildings, plant and tanks, and the installation of a 2.5
megawatt wind turbine. The Deputy Mayor made representations on 11 June 2008 in respect to various strategic issues including Metropolitan Open Land, Energy and Transport. These were subsequently addressed and permission was granted on 5 November 2008 after the Mayor had indicated he was content to allow the Council to determine the application itself.

**Strategic planning issues and relevant policies and guidance**

15 The relevant issues and corresponding policies are as follows:

- **MOL**
  - London Plan; PPG2
- **Open land**
  - London Plan; PPG17; draft PPS Planning for a Natural and Healthy Environment; East London Green Grid network SPG
- **River Thames**
  - London Plan; Mayor’s draft Water Strategy; PPS25, RPG3B
- **Sewerage infrastructure**
  - London Plan
- **Urban design**
  - London Plan; PPS1
- **Access**
  - London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)
- **Air quality**
  - London Plan; the Mayor’s Air Quality Strategy; draft replacement air quality strategy; PPS23
- **Ambient noise**
  - London Plan; the Mayor’s Ambient Noise Strategy; PPG24
- **Sustainable development**
  - London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor’s Energy Strategy; Mayor’s draft Climate Change Mitigation and Adaptation Strategies; Mayor’s draft Water Strategy; Sustainable Design and Construction SPG
- **Transport**
  - London Plan; the Mayor’s Transport Strategy

16 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2004 Bexley Unitary Development Plan (Saved Policies) and the London Plan (Consolidated with Alterations since 2004).

17 The following are also relevant material considerations:

- The Bexley Core Strategy (Preferred Approach Paper for consultation February 2010).

**Principle of development**

18 The proposed development will take place entirely within the operational boundary of the site, predominantly on land designated locally as a ‘special industrial zone’. However, a portion of the red line boundary along the western edge of the site overlaps the edge of the Crossness conservation area and land designated as MOL.

19 Policies 3D.9 and 3D.10 of the London Plan align presumption against inappropriate development on MOL, which is given the same level of protection as Green Belt (set out in national guidance PPG2).

20 No built development is proposed on the MOL, rather the land is intended to be landscaped in order to visually enhance the MOL and the setting of the conservation area. This approach does not, therefore, constitute inappropriate development, and is supported in line with
London Plan policies 3D.9 and 3D.10 which seek to improve the environmental and landscape quality of such land, while meeting its statutory purposes.

Policy 4A.18 of the London Plan promotes partnership working with relevant stakeholders to ensure that London’s drainage and sewerage infrastructure is sustainable and meets the requirements placed upon it by population growth and climate change. The policy also identifies the need to provide additional capacity for the management of sewage sludge and states that the Mayor will work in partnership with the boroughs to ensure timely provision of appropriate facilities at sewage treatments works in London.

The proposed development supports a series of works aimed at improving the water quality of the Thames Tideway as a response to the requirements of the Urban Waste Water Treatment Directive. The enhanced digestion facility would provide a more sustainable approach to day-to-day sludge treatment at the site, while providing the capacity to meet the projected increase in demand from population growth, and the planned overhaul of the sludge powered generator (required within the next decade).

The principle of the development is therefore supported in line with Policy 4A.18.

**Urban design**

Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within Chapter 4B, which address both general design principles and specific design issues. London Plan Policy 4B.1 sets out a series of overarching design principles for development in London. Other design polices in this chapter and elsewhere in the London Plan include design requirements relating to specific issues.

The draft replacement London Plan reinforces these principles, with new development required to have regard to its context, and reinforce or enhance the character, legibility and permeability of the neighbourhood (Policy 7.1).

**Siting, massing and layout**

The design and siting of the proposals at the Crossness STW has been driven primarily by the space available within the operational core of the site, the function of the proposed buildings, and the processes which they are intended to contain. The applicant has, however, also given careful consideration to the adjacent conservation area, along with the listed Victorian structures within it, and the site’s prominent location fronting onto the River Thames.

The proposed approach of refurbishing existing infrastructure and redeveloping an area of disused structures within the operational core avoids encroachment into the surrounding MOL and conservation areas, and is supported in line with Policy 4B.1. It is also noted that the compact nature of the proposals, and their proximity to other existing site facilities, minimises pumping distances and enhances the overall sustainability of the design.

The most prominent feature of the development is the sludge cake storage building and its associated ventilation stack, which effectively fronts directly onto the river. The applicant has acknowledged that the development represents an opportunity, and obligation, to create a landmark building on the waterfront between the modern sludge powered generator and Grade I listed Victorian Pumping Station. The approach adopted by the architect has been to align the building so that the long elevation runs parallel to the river, and the shorter elevation is adjacent to the Crossness conservation area. The net effect results in a linear expression of the building mass from river views, mirroring that of the neighbouring Victorian structures, while providing a slightly
narrower silhouette in views from the conservation area which helps to reduce the visual impact on the historic Victorian complex.

Visual impact

29 The applicant has carried out an impact assessment on local views and the adjacent Crossness conservation area. The assessment finds that the setting of the conservation area and Victorian Pumping Station would experience an impact as a result of the proposed development within views to the east. However, the modern sewage works represents an accepted setting to the western boundary of conservation area, and the proposals do not in themselves affect the relationship between the historic and modern, functioning, parts of the Crossness STW site. In addition, the retention and enhancement of the green space between the historic structures and proposed building will maintain the important spatial distinction between the two.

30 The proposed development will also include two stacks, necessary to meet the Council’s long-term air quality objectives, which will be visible when viewing the historic buildings and wider site from the west. However, these would be seen in the context of the predominantly industrial character of this riverside area, and the 86 metre wind turbine (consented in 2008 as part of the STW extension application). On this basis, and in view of the infrastructural benefits derived from the development, the impact on the setting of the conservation area and listed structures is acceptable in strategic planning terms.

Design character

31 While the building is essentially utilitarian in character, the architect has given careful consideration to the treatment of the facade in view of its context and river front location. Following ongoing discussions with the Council and English Heritage, the applicant is proposing the use of textures and etchings on external concrete panels, as well as areas of coloured aluminium cladding and cast glass channel glazing. This breaks up the perceived mass of the building and creates interest at both the near, and medium to long distance views. The appearance of the sludge cake storage building’s ventilation stack has also been carefully considered, and is to be encased in coloured cladding, with a glazed upper section. This forms a slender central ‘tower’ element, adding character and articulation to the building from river views. The design would also provide an illumination effect on the structure at night through transmission of the building’s own internal utility lighting through the glazed sections.

32 The architect and applicant have responded well to the constraints and obligations of this prominent yet sensitive riverfront location, and, on balance, the intended design accords with London Plan policy 4B.1. The Council should work to secure the proposed aesthetic elements of the scheme through planning condition to ensure the proposed character of the building is realised as envisaged.

Air quality

33 Owing to the size and nature of the proposed CHP facility it will be regulated by the Environmental Permitting Regulations 2010, which will include the setting of emissions limits for atmospheric emissions from the stack. However, whilst it is acknowledged that a full impact assessment will have to be submitted with a future Environmental Permit application, it is considered that an appropriate level of assessment is required at the planning stage in order to inform the decision making process.

34 Therefore, information is sought from the applicant on the combined air quality effects of the CHP engine and boiler emissions with those from the sludge energy from waste plant operating
on the Crossness STW site. Whilst it could be argued that the baseline monitoring has 'captured' the effect of the energy from waste plant emissions upon local air quality, this would only relate to the annual average NO2 concentrations and not the short term ground level concentrations. This should be conducted at the planning stage. In addition, it would be normal and appropriate in this case to make an assessment of the magnitude and significance of the air quality effects at these locations using, for example the Environmental Protection UK (EPUK) Guidance.

**Odour**

35 The applicant’s assessment has demonstrated that although there is a 2% increase in overall odour emissions from the sources on site, this is unlikely to change off-site odour concentrations. However, if the nature of the odour off-site changes, it may be the case that odour perception and annoyance experienced by the local population could also change.

36 Crossness STW has, in the past, been the subject of concern to local residents as a result of previous excessive release of odours during sewage and sludge treatment and there is currently an Odour Management Plan agreed by Thames Water Utilities Ltd. (TWU) and the Council, by means of which odour emissions are controlled. Taking this into account, the GLA wishes to encourage TWU to seek further gains from the enhanced sludge digestion facility scheme in terms of reductions in odour emissions and exposure, rather than simply ensuring no further increase in odour emissions.

37 On this basis, confirmation is sought from the applicant to demonstrate that TWU has investigated all viable schemes to seek further reductions in odour emissions.

**Noise**

**Baseline data**

38 It is noted that the baseline data is fairly old, (relating to June 2006). It would be prudent to determine whether any significant new noise sources have been introduced to the area or indeed removed from the area since that time.

**Construction noise**

39 The assessment indicates that construction could last up to 3 years, during which time the developer and the Council have agreed that construction noise is not to be audible at nearest receptors outside the stated working hours. However, no prediction has been made of construction noise. It would, therefore, be possible for there to be a significant noise impact from the works during these hours.

40 On this basis, it is proposed that noise level predictions are undertaken during the detailed design stage and that such predictions are included as a planning condition.

**Operational noise**

41 Section 10.1.1 of the noise environmental report ‘Consultation’ states that, “operational noise... should not give rise to a BS 4142 rating level 5 dB greater than the lowest measured background level”. Paragraph 10.5.1 states, however, that “the predicted rating noise level... should not exceed 5 dB below the lowest existing measured daytime or night time background noise levels at the closest receptor locations”. These statements are contradictory and clarification should be given that the latter case applies.
Sustainable development

42 The applicant has broadly followed the energy hierarchy as set out in London Plan policy 4A.1. Sufficient information has been provided to understand the proposals as a whole, and comments on specific elements of the proposal are set out below.

Be lean – using less energy

43 The energy use and carbon dioxide emissions of the development are dominated by process loads i.e. energy use not regulated by Building Regulations. Given the energy intensity and, hence, cost of operating the processes on the site, it is in the applicant’s clear financial interest to maximise energy efficiency. As such the applicant is adopting a number of measures to minimise energy use on site including: reducing the distance sludge has to be pumped around the site and adopting gravity feed systems.

44 After energy efficiency measures, the enhanced sludge digestion facility is estimated to emit an additional 6,786 tonnes of carbon dioxide per annum.

Be clean and green – supplying energy efficiently and using renewable energy

45 The applicant should clarify whether there will be any surplus heat available from the processes on site, e.g. low temperature hot water from the CHP (combined heat and power plant). If there is, the applicant should consider whether there is any possibility to export surplus heat to buildings in the area through a district heating network.

46 Onsite anaerobic digestion will produce significant quantities of biogas. This will be used to feed three 1.4M We CHP engines (4.2M We total capacity). Power from the engines will be used within the Crossness STW. Heat from the CHP will be used in the processes. The high grade heat will be used to raise steam for the thermal hydrolysis plant (THP). The residual heat from the THP process then maintains the digestion tanks at the optimum temperature. The electricity generated by the CHP plant will avoid the emission of 16,340 tonnes of carbon dioxide per annum due to the displacement of imported grid electricity. This is welcomed, however, the applicant should provide further information on how the low temperature hot water from the CHP engines will be used.

47 The building will be naturally ventilated. However, fans are used to cool the temperature of the product emerging from the THP process. The applicant should clarify whether there is scope to adopt a less energy intensive form of cooling in this respect.

48 Overall, a net reduction in carbon dioxide emissions of 9,554 tonnes per annum will be achieved through the enhanced scheme. This benefit will primarily be realised through a reduction in emissions of the overall Crossness STW. While the proposals are acceptable in principle, further information is required before the proposals can be accepted and carbon dioxide savings verified.

Climate change adaptation

49 Developments are required to be adaptable to the climate they will face over their lifetime and to address the five principles set out in policy 4A.9 of the London Plan. These are: to minimise overheating and contribution to heat island effects; minimise solar gain in summer; contribute to flood risk reductions, including the application of sustainable drainage principles; minimise water use; and protect and enhance green infrastructure. Specific policies cover overheating, living roofs and walls, and water conservation. Chapter 5 of the draft replacement London Plan also considers climate change adaptation, specifically in policies 5.9 to 5.15.
Flood risk reduction

The applicant has submitted a flood risk assessment which draws from outputs of the previous assessment produced for the wider Crossness STW site as part of the 2008 application to extend the sewage works. This approach has been agreed in principle by the Environment Agency.

The site is located in flood zone 3 of the Thames Tideway on the Environment Agency flood map. It is classified as having greater than a 1% (1 in 100 year) annual probability of river flooding, or as having greater than a 0.5% (1 in 200 year) annual probability of tidal flooding in any year. The proposed works are, however, classified as ‘less vulnerable development’, and in their proposed location are likely to fulfil the sequential test described in PPS25, given their special need for proximity to the existing sewage treatment plant and its associated facilities.

The flood risk assessment finds that the site is at low risk of flooding from fluvial, groundwater and overland flow sources and at moderate risk of flooding from surcharged sewers.

While the site lies within the indicative tidal flood plain the Thames Tidal Defences provide protection against flooding from the 0.1% annual probability flood event, inclusive of climate change. The site is therefore only deemed to be at residual risk from tidal flooding in the event of a breach scenario.

A breach of the Thames Tidal Defences (a worst case 0.1% annual probability event inclusive of climate change), would result in approximately two metres of flood water on the proposed site.

Given the low frequency of breaches occurring but potentially high flood depths, mitigation against this risk would primarily focus on staff evacuation. This would be integrated as part of the overall Crossness STW evacuation plan proposed by the 2008 flood risk assessment.

In order to mitigate against sewer flow flooding, it is proposed that floor or entrance levels of more vulnerable buildings or equipment (e.g. pumps or electrical sub stations) are raised above the surrounding ground level.

Surface water flooding / sustainable drainage techniques

The London Plan (policy 4A.14) requires the use of sustainable drainage systems in new developments.

The proposed development will lead to a slight overall increase in the amount of impermeable land at the site. However, the submitted flood risk assessment indicates that the site’s surface water system would be sufficient to convey flows generated during the 3.3% annual probability event. Surface water generated during the 1% annual probability event, inclusive of climate change, would be attenuated via on-site surface storage on roads and parking areas.

Given the site’s operation as a sludge treatment facility, the principal concern with regard to surface water flooding relates to contaminants being contained within site generated runoff.

The water resources element of the applicant’s environmental report notes that the potential for pathways for the release of contaminants into surface water features are limited due to the presence of raised flood defence walls and given the distance (approximately 300m) from the Great Breach Dyke.

The presence of clays and silts in the made ground and alluvium beneath the site could also reduce the risk of contaminants entering the underlying aquifers beneath the site. However, the
land quality report indicates that some historical contamination of the shallow secondary aquifer has occurred at the STW site, thus there is the potential for a pathway to exist. The low permeability of the Lambeth group seam would prevent migration of contaminants between the aquifers. However, construction methods include piling or excavation activities could result in the release of contaminants into the groundwater resources. The applicant is therefore advised to follow the best practice construction methods in the Environment Agency’s pollution prevention guidelines (PPG) to minimise the effects of construction on the surrounding water resources.

62 Given the limited pathways into the various water features described above, there do not appear to be any potentially significant sources of pollution from the site during operation. In addition, surface water landing on hardstanding areas, including roads, will be positively drained, with potential runoff from ‘contaminated’ sources (e.g. runoff from the pump slabs and thermal exchange press etc.) being routed via the STW for treatment. The positive drainage methods are welcomed and should be secured by the Council through planning condition to ensure that any potential contaminants or pollutants resulting from accidental spillages in these runoff areas do not leach into the surrounding site and environment.

**Minimising water use**

63 It is not apparent whether the applicant is proposing measures to reduce water use as part of the development. The applicant should investigate the potential for storage of grey water for use as part of on site treatment processes and/or other site amenities such as WC’s to enhance the sustainability of the development in line with London Plan policy 4A.14.

**Transport**

64 TfL is satisfied that the development is unlikely to have a significant impact on either the strategic highway network (SRN) or the public transport network.

65 It is recommended that a travel plan covering the operational phase of the development is secured for the site by condition. This should have regard to any travel planning measures that are in place as part of the main Crossness STW site.

66 While the proposed level of car parking on site (10 spaces) is acceptable, cycle parking provision is, however, considered as insufficient. For 20,000 sq.m. of development, the London Plan requires the provision of 40 cycle spaces. While it is accepted that this might be slightly excessive given the nature of the development, the current proposal for three spaces should nevertheless be increased.

67 Despite the proximity of the site to the river, TfL has previously agreed with the applicant that it would be unfeasible to use existing wharf facilities to directly service this site. However, the applicant is still expected to maximise the use of river borne transport through the supply chain. Local facilities should be used where possible to reduce road miles and the consequential impact on local roads, including on the sections of Transport for London road network (TLRN) and SRN in and around Woolwich, Greenwich and further south and east.

68 In accordance with London Plan policy 3C.25 and draft replacement London Plan, TfL recommends that a construction logistics plan (CLP) be secured for the site by condition, in order to reduce the impact of the development on the highway network during the construction phase. TfL would also request that construction traffic be co-ordinated to avoid accessing the site during peak traffic periods.

69 In summary, TfL is satisfied that this development is unlikely to have a negative impact on the strategic highway or public transport network, and subject to the above matters being
adequately addressed, is satisfied that it could accord with the transport policies of the London Plan.

**Local planning authority’s position**

70 The view of the local planning authority is not known at the time of writing of this report.

**Legal considerations**

71 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor’s statement and comments.

**Financial considerations**

72 There are no financial considerations at this stage.

**Conclusion**

73 London Plan policies on are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Metropolitan Open Land**: No built development is proposed on MOL and the proposal does not constitute inappropriate development.

- **Sewerage infrastructure**: The proposed development supports the principles of Policy 4A.18.

- **Urban design**: On balance, the intended design accords with London Plan policy 4B.1.

- **Air quality**: The applicant should address the comments in the air quality and odour sections of this report to ensure the application complies with London Plan air quality policies.

- **Noise**: The applicant should address the comments in the noise section of this report to ensure the application complies with London Plan policies on noise.

- **Sustainable development**: Further information is required before the proposals can be accepted and carbon dioxide savings verified. The applicant should also investigate the potential for storage of grey water for use as part of on site treatment processes and/or other site amenities.

- **Transport**: The principles of the development broadly accord with the transport policies of London Plan, the applicant should, however, address the points raised in the transport section of this report.
Whilst the application is broadly acceptable in strategic planning terms, on balance, further work is required to ensure the application complies with the London Plan.

The following changes might, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Air quality**: The applicant should address the comments in the air quality and odour sections of this report.

- **Noise**: The applicant should address the comments in the noise section of this report.

- **Sustainable development**: The applicant should address the points raised in the sustainable development and climate change mitigation sections of this report.

- **Transport**: The applicant should address the points raised in the transport section of this report.

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