LONDON BOROUGH OF NEWHAM

STRATEGIC DEVELOPMENT COMMITTEE

15th October 2019

<table>
<thead>
<tr>
<th>Application Number:</th>
<th>18/03543/FUL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Validation Date:</td>
<td>5th March 2019</td>
</tr>
<tr>
<td>Location:</td>
<td>Plaistow Wharf, North Woolwich Road, Silvertown, London, E16 2AB</td>
</tr>
<tr>
<td>Ward:</td>
<td>Royal Docks</td>
</tr>
<tr>
<td>Applicants:</td>
<td>Keltbray</td>
</tr>
<tr>
<td>Agent:</td>
<td>Matthews and Son</td>
</tr>
</tbody>
</table>

Purpose of Report / Proposal

The purpose of this report is to set out the Officer recommendations to Strategic Development Committee regarding an application for planning permission relating to the following proposal.

Redevelopment of the vacant wharf for use as a road-river hub for construction demolition and excavation waste storage and transfer, comprising the construction of stock bays, for storage of construction, demolition and excavation waste, incorporating a sustainable drainage system, widening of the wharf landing area, storage and fabrication for civil engineering projects and erection of weighbridge, office facilities and associated infrastructure.

Recommendations

The Strategic Development Committee is asked to resolve to:

1. agree the reasons for approval as set out in this report;

2. delegate authority to the Director of Planning and Development to further consider the consultation response from the Environment Agency on the technical details related to flood defences and use delegated powers to approve the application and where appropriate to add additional conditions;
3. refer this application to the Mayor of London (the GLA) as a Stage 2 referral; and;

4. delegate authority to the Director of Planning and Development to grant planning permission subject to the completion of a legal agreement under s106 of the Town and Country Planning Act 1990 (as amended) by (11th March 2020) based on the Heads of Terms identified at Appendix 2 of this report and the Conditions listed in Appendix 1 of this report and summarised below. If the legal agreement is not completed by such date then the Director of Planning and Development is delegated authority to refuse planning permission or extend this timeframe to grant approval.

**Conditions – Summary**

A summary of the proposed condition is set out below. Please refer to Appendix 1 for the proposed conditions in full.

**Conditions**

1. Time limit
2. Approved plans and documents

**Compliance Conditions**

3. Site Working Plan
4. Hours of operation
5. Noise
6. Wheel Wash Operation
7. Consolidated Surfacing

**S106 –Heads of Terms**

The Section 106 Legal Agreement Heads of Terms agreed between the Council and the Applicant are set out below:

1. Payment of the Council’s reasonable professional and legal costs;
2. Safeguarding of Footpath

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**NAME OF LEAD OFFICER:** Amanda Reid  
**POSITION:** Director of Planning and Development, Chief Planning Officer  

Originator of report: Mr Sean Scott  
Tel no: 020 3373 8375  
E-mail address: sean.scott@newham.gov.uk
Human Rights Act

The provisions of the Human Rights Act 1998 have been taken into account in the processing of the application and the preparation of this report.

Equalities

In determining this planning application the Council has regard to its equalities obligations including its obligations under section 149 of the Equality Act 2010.

For the purposes of this application there are no adverse equalities issues.

Local Government (Access to Information) Act 1985

Background papers used in preparing this report:

- Planning Application
- Statutory Register of Planning Decisions
- Correspondence with Adjoining Occupiers
- Correspondence with Statutory Bodies
- Correspondence with other Council Departments
- National Planning Policy Framework
- London Plan
- Local Plan
- Other relevant guidance
# PLANNING APPLICATION FACT SHEET

## The Site

<table>
<thead>
<tr>
<th>Address</th>
<th>Plaistow Wharf, North Woolwich Road, Silvertown, London, E16 2AB</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicant</td>
<td>Keltbray</td>
</tr>
<tr>
<td>Ward</td>
<td>Royal Docks</td>
</tr>
<tr>
<td>Local Plan allocation</td>
<td>N/A</td>
</tr>
<tr>
<td>Conservation Area</td>
<td>N/A</td>
</tr>
<tr>
<td>Listed Building</td>
<td>N/A</td>
</tr>
<tr>
<td>Setting of Listed Building</td>
<td>N/A</td>
</tr>
<tr>
<td>Building of Local Interest</td>
<td>N/A</td>
</tr>
<tr>
<td>Tree Preservation Order</td>
<td>N/A</td>
</tr>
<tr>
<td>Flood Risk Zone</td>
<td>3</td>
</tr>
</tbody>
</table>

### Other
- Strategic Site, Central Thameside West (site ref S07)
- Archaeological priority Area – Tier 3
- Adjoining a Site of Nature Conservation Interest (SINC)
- Safeguarded Wharf
- Water Quality Stress Zone (River Thames)
- Flood Zone 3
- Park Deficiency Area:
  - Pocket Parks
  - Local Parks
  - District Parks
  - Metropolitan Parks
- Access to Nature Deficiency
- London City Airport Noise Contours: 57 dB
- Controlled Parking Zones
- Flood Defence Safeguarding

## Non-residential Uses

<table>
<thead>
<tr>
<th>Existing Use(s)</th>
<th>Existing Use / Operator</th>
<th>Vacant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing Use Class sqm</td>
<td>Vacant</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Proposed Use(s)</th>
<th>Proposed Use / Operator</th>
<th>CDE waste storage and transfer site/Keltbray</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proposed Use Class</td>
<td>Sui Generis – 1.93 ha</td>
<td></td>
</tr>
</tbody>
</table>

### Employment
- Existing number of jobs: 0
- Proposed number of jobs: 15

## Transportation

<p>| Car Parking | No. Existing Car Parking spaces | 0 |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>No. Proposed Car Parking Spaces</strong></td>
<td></td>
<td>10</td>
</tr>
<tr>
<td><strong>Cycle Parking</strong></td>
<td><strong>No. Existing Cycle Parking spaces</strong></td>
<td>0</td>
</tr>
<tr>
<td></td>
<td><strong>No. Proposed Cycle Parking Spaces</strong></td>
<td>6</td>
</tr>
<tr>
<td><strong>Public Transport</strong></td>
<td><strong>PTAL Rating</strong></td>
<td>2 (Poor)</td>
</tr>
<tr>
<td></td>
<td><strong>Closest Rail Station / Distance (m)</strong></td>
<td>West Silvertown/ 265m</td>
</tr>
<tr>
<td></td>
<td><strong>Bus Routes</strong></td>
<td>474</td>
</tr>
<tr>
<td><strong>Parking Controls</strong></td>
<td><strong>Residents Parking Zone?</strong></td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td><strong>RPZ Hours</strong></td>
<td>Monday to Sunday 8am - 6.30pm</td>
</tr>
</tbody>
</table>

**Public Consultation**

| Number of properties consulted | 152 |
| Expiry of consultation period  | 10th April 2019 |
| Number of responses            | 2   |
| Number in support              | 0   |
| Number of objections           | 2   |
| Number of other representations (neither objecting or supporting) | 0   |
1.0 SITE & SURROUNDINGS

1.1 The site is located in the south of the Royal Docks and has a site area of 1.93 hectares (ha). There are two pre-fabricated cabins in the northern part of the site, otherwise the remainder of the site is vacant. The site is generally flat, stepping up towards the River Thames. The site is accessed from the north by North Woolwich Road and an access road shared with the neighbouring Brett Aggregates site.

1.2 The site is allocated by the Local Plan as a Strategic Site, Central Thameside West (site ref S07). The allocation specifies:

‘Employment and wharf development comprising the reactivated Peruvian Wharf and consolidation of other Thameside West Wharves on this and land to the east at Royal Primrose Wharf. Employment development will be consistent with the Strategic Industrial Location (SIL) designation, maximising opportunities for modern industrial uses and support the wharf use including providing access, together with improved access to adjoining SIL uses from North Woolwich Road, preferably in the form of a central spine road with connections east, west and to the wharves.’

1.3 The site forms part (roughly one half) of Peruvian Wharf, which is designated as a Safeguarded Wharf and Strategic Industrial Location (Thameside East (ref 45)). In addition the site is located within an Employment Hub (ref E02). The focus of the employment hub is stated within the Local Plan as:

‘B Class Uses (SIL), particularly high technology manufacturing, wharf related uses, cultural and creative, construction and green industries.’

1.4 Other designations include:

- Archaeological priority Area – Tier 3
- The development adjoins a Site of Nature Conservation Interest (SINC)
- Safeguarded Wharf
- Water Quality Stress Zone (River Thames)
- Flood Zone 3
- Park Deficiency Area:
  - Pocket Parks
  - Local Parks
  - District Parks
  - Metropolitan Parks
- Access to Nature Deficiency
- London City Airport Noise Contours: 57 dB
- Controlled Parking Zones
- Flood Defence Safeguarding

1.5 There are two sites to the north of the site that are still within the Peruvian Wharf area, one being a vacant plot of land, formally used for industrial
purposes and the other being the Tate and Lyle Golden Syrup Factory. To the south of the site is the River Thames which is approximately 400 metres in width at this point with views across to Greenwich. To the west is the Brett Aggregates aggregate processing site and to the east is the former John Knight animal by-products processing site.

1.6 Despite much of the surrounding land being vacant, the area is predominantly industrial in character. However, it is noted that there is emerging residential development in the area in particular along North Woolwich Road and at Royal Wharf and Deanston Wharf.

1.7 As set out in the Relevant History section of this report permission was granted in 2008 under planning ref. 07/01816/LTGDC for an aggregates processing facility operated by Brett Aggregates. To clarify the Brett Aggregates site comprises Peruvian Wharf in the west and Plaistow Wharf in the east. Brett has consolidated some of its operations into the Peruvian part of the site and will now no longer pursue the development of Plaistow Wharf for the storage of cementitious materials, the dry sand mortar and the bagging plants.
2.0 PROPOSAL

2.1 The proposal is to relocate existing CDE waste operations at Thames Wharf to Plaistow Wharf. Thames Wharf lies approximately 800 metres to the north-west of the application site. The reason for the relocation of this operation is due to the construction phases of the approved Silvertown Tunnel.

2.1 The proposal is for:

Redevelopment of the vacant wharf for use as a road-river hub for construction demolition and excavation waste storage and transfer, comprising the construction of stock bays, for storage of construction, demolition and excavation waste, incorporating a sustainable drainage system, widening of the wharf landing area, storage and fabrication for civil engineering projects and erection of weighbridge, office facilities and associated infrastructure.

2.2 The site will handle Construction, Demolition & Excavation (CDE) waste which will be imported by road. The CDE waste will be screened on arrival at the site and once certified the material will be stored on the site ready to be placed onto a barge and transferred to a site in Kent using the River Thames. The CDE waste will be transferred onto the barges using mobile plant with loading shovels and grabbers. Barges will collect this material 2-5 times a week. In instances where the CDE waste does not meet quality protocols on arrival at the site it would be refused and directed to Mohawk Wharf, some 600m to the east of the site.

2.3 The proposed redevelopment of Plaistow Wharf would comprise:

- construction of 8 [bays A-F, Quarantine bay, open storage] stock bays, for storage of CDE waste incorporating a sustainable drainage system;
- widening of the wharf landing/platform area;
- plant and equipment storage and fabrication for civil engineering projects;
- erection of weighbridge;
- office and welfare facilities;
- Associated infrastructure comprising a wheel washing area and a skip, Control of Substances Harmful to Health (COSHH), fuel area;
- Concrete hardstanding; and,
- Parking and bicycle parking
3.0 RELEVANT HISTORY

3.1 Planning Application History

3.2 A summary of the relevant planning application history is set out in the table below:

<table>
<thead>
<tr>
<th>Ref No.</th>
<th>Description</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>16/03183/FUL</td>
<td>Construction of a permanent access road connecting Peruvian Wharf with North Woolwich Road and associated operational development works.</td>
<td>Withdrawn on 26 February 2018</td>
</tr>
</tbody>
</table>
| 16/02947/FUL     | Comprehensive redevelopment of the site to provide a residential-led, mixed-use development of 3no. blocks ranging from 5 to 20 storeys in height, comprising:  
- 946 residential units (Use Class C3);  
- retail, financial and professional services, and food and drink uses (Use Class A1, A2 and A3) up to 527sqm (GIA) of flexible floorspace; and  
- commercial and community uses (Use Class B1, D1) up to 1,841sqm (GIA) of flexible floorspace.  

The proposals also include the installation of new, and modifications to existing roads, an energy centre, car and cycle parking facilities, landscaping and public realm works.  

A major application, accompanied by an Environmental Statement for the purposes of Environmental Impact Assessment. A Departure from the Development Plan. | Withdrawn on 26 February 2018    |
| 16/00286/NON MAT | Non material amendment to planning permission 14/00395/FUL dated 28 March 2014 - Minor alterations to the route of the proposed road.                                                                                                                                                                                                                   | Approved by the London Thames Gateway Development Corporation on 29 March 2016 |
| 07/01816/LTG DC  | Tranship and distribute aggregates using sea-going vessels, utilising rear of the wharf for aggregate storage, loading and onward distribution and for cementitious                                        | Approved by the London Thames Gateway                                      |
| Powders import, storage and export. Construction and operation of a ready-mixed concrete batching plant and a dry silo mortar plant using aggregates and cementitious powders landed and handled. The bagging of aggregates. | Development Corporation on 3 December 2008 |
4.0 CONSULTATION

4.1 Application Publicity

4.2 In total three site notices erected, two on North Woolwich Road and one on Knights Road on 19 March 2019, expiring on 9 April 2019.

4.3 A press Notice was advertised in the Newham Recorder on 20 March 2019, expiring on 10 April 2019.

4.4 The application was advertised as a major application.

4.5 A total of 152 consultation letters were sent to neighbouring properties regarding this application on 11 March 2019. The public consultation period expired on 1 April 2019.

4.6 Adjoining Properties

<table>
<thead>
<tr>
<th>Number of Letters Sent</th>
<th>152</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Responses Received</td>
<td>2</td>
</tr>
<tr>
<td>Number in Support</td>
<td>0</td>
</tr>
<tr>
<td>Number of Objections</td>
<td>2</td>
</tr>
<tr>
<td>Number of other Representations (neither objecting or supporting)</td>
<td>0</td>
</tr>
</tbody>
</table>

4.7 A total of 2 responses were received from adjoining occupiers, comprising 0 in support and 2 objecting to the application.

4.8 In summary the objections to the application relate to the following issues:

- Daylight/sunlight
- Heritage
- Loss of privacy
- Noise and disturbance
- Air quality/air pollution
- Outlook
- Parking
- Public safety
- Traffic and road safety
- The proposed use
- Visual amenity/design
- Economic impacts – negative impact on tourism
- Harmful impact on the open, rural and undeveloped character of West Silvertown.
A summary of the responses received along with the Officer comments are set out below.

<table>
<thead>
<tr>
<th>Address:</th>
<th>15 Badminton Mews, Silvertown, London E16 1TH</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>14th March 2019</td>
</tr>
<tr>
<td>Type:</td>
<td>Online comment</td>
</tr>
<tr>
<td>Stance:</td>
<td>Objection comments</td>
</tr>
</tbody>
</table>

**Details of representation:**
Objects to the application due to:
- daylight/sunlight
- heritage
- loss of privacy
- noise and disturbance
- outlook
- parking
- public safety
- traffic
- use
- visual amenity/design

“I write to object on the grounds that it would harm road safety, create noise, create air pollution, damage tourism and is not the most suitable location for the area it will serve.

The dust and the smell from Thames Wharf during warm weather is already unbearable at times, a move closer to residential property will only make this problem worse.

The waste transfer site already works late into the night on many occasions as well as weekends and the noise nuisance would become even more of a social nuisance.

The refuse vehicles would conflict with the large volume of other traffic along the road, in particular causing danger to pedestrian and cyclists as this is already a "hot-spot" for danger.

The area is attempting to redefine itself to tourists along the Victoria Dock area, and to new residents in all the new residential properties that are being built. The waste transfer site would go against all the new redevelopment and only serve to be a detriment to the area.”

**Officer comments on representation:**
Officers note that the application would be located in a Strategic Industrial Location and on a Safeguarded Wharf. As set out in Section 7, the principle of the proposed use is supported. It is not noted that tourism is a particular plan objective in this part of the Royal Docks.
Officers noted that the site vacant at the time of the officer site visit. Noise and disturbance is a key consideration it is considered at section 7 and will be controlled by way of planning Condition at Appendix 1.

Issues relating to parking congestion are noted and assessed in section 7 of this report.

| Address: | Flat 4, West Lodge, Britannia Gate Silvertown, London E16 1SA |
| Date received: | 15 March 2019 |
| Type: | Online comment |
| Stance: | Objection comments |

Details of representation:
Objects to the application due to:

- noise and disturbance
- public safety
- traffic

“We wish to make you aware of a number of strong objections that we have with regard to the proposed relocation of waste transfer use from Thames Wharf to Plaistow Wharf, application number reference above. As an immediate neighbour to the site of proposed development, we are of the view that the proposed development will have a serious impact on our standard of living. Our specific objections are as follows:

The site is located in a predominantly residential area where occupiers could reasonably expect a level of amenity concurrent with the property. The propose use of site introduces a diverse element that by reason of the use is likely to result in noise, disturbance (e.g. air pollutions) and nuisance to the detriment of neighbour's residential amenity.

This site proposal would lead to potential safety hazards; create conflicts between pedestrians, cyclists and vehicular movements thereby creating a safety hazard which discourage people to cycle and to live in this residential area. As a resident in Silvertown, we have the right to enjoy a quiet and safe residential environment.

The proposal represents an inappropriate form of development within West Silvertown and in the absence of any special circumstances would by its inappropriateness have a harmful impact on the open, rural and undeveloped character of West Silvertown. This area is attempting to redefine itself to tourist along the Victoria Dock area and to new residents in all the new residential properties that are being built. The waste transfer site goes against all the new developments and only serves to be a detriment to the area.
We would be grateful if the council would take our objections into consideration when deciding this application. We would welcome the opportunity to meet with a representative of the planning department to illustrate our objections at first hand.”

**Officer comments on representation:**

Officers note that the application would be located in a Strategic Industrial Location and on a Safeguarded Wharf. As set out in Section 7, the principle of the proposed uses are supported. It is not noted that tourism is a particular plan objective in this part of the Royal Docks.

It is assessed that the area is urban in character. The land itself is a brownfield site which has been used for various wharf/industrial purposes for over a century.

In summary noise and disturbance is addressed via condition which will restrict the operating hours and the type of operations so that residential amenity will be respected at weekends, early morning and at night. However, officers are also mindful that this is a wharf on the Tidal Thames and there are circumstances where the wharf may need to be used outside of these hours.

LBN Transport has assessed the impact on safety using the existing access. Contributions have been sought for improvements to pedestrian and cycle infrastructure. As a result of other schemes in the vicinity of the site a masterplanned approach will need to be undertaken if other scheme as approved. And the applicant acknowledges this in the accompanying Masterplanning Statement.

Section 7 of this report addresses these concerns.

<table>
<thead>
<tr>
<th>4.10 Statutory and Non Statutory Consultation</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.11 The following consultations have been undertaken:</td>
</tr>
<tr>
<td>LBN CIL (Community Infrastructure Levy)</td>
</tr>
<tr>
<td>LBN Environmental Health - Pollution General</td>
</tr>
<tr>
<td>LBN Highways Team</td>
</tr>
<tr>
<td>LBN Investment</td>
</tr>
<tr>
<td>LBN Landscape Architects</td>
</tr>
<tr>
<td>LBN Regeneration</td>
</tr>
<tr>
<td>LBN Transportation</td>
</tr>
<tr>
<td>LBN Urban Design &amp; Conservation</td>
</tr>
<tr>
<td>LBN Waste Management</td>
</tr>
<tr>
<td>Lead Local Flood Authority</td>
</tr>
<tr>
<td>Crossrail Ltd</td>
</tr>
<tr>
<td>Historic England - GLAAS</td>
</tr>
<tr>
<td>Environment Agency</td>
</tr>
<tr>
<td>Designing Out Crime Officer, Metropolitan Police Service</td>
</tr>
</tbody>
</table>

London Borough of Newham
4.12 External Consultation

4.13 A summary of the consultation responses received along with the Officer comments are set out in the Table below.

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>Crossrail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>12 March 2019</td>
</tr>
</tbody>
</table>

Summary of consultation response:
‘The implications of the Crossrail proposals for the application have been considered and I write to inform you that Crossrail Limited do not wish to make any comments on this application as submitted.’

Officer comments on consultation response:
Noted.

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>Natural England</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>21st March 2019</td>
</tr>
</tbody>
</table>

Summary of consultation response:
‘Natural England has no comments to make on this application.

Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species or you may wish to consult your own ecology services for advice.

The lack of comment from Natural England does not imply that there are no impacts on the natural environment, but only that the application is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.'
We recommend referring to our SSSI Impact Risk Zones (available on Magic and as a downloadable dataset) prior to consultation with Natural England. Further guidance on when to consult Natural England on planning and development proposals is available on gov.uk at https://www.gov.uk/guidance/local-planning-authorities-get-environmental-advice

**Officer comments on consultation response:**
Noted.

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>Historic England - GLAAS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>25 March 2019</td>
</tr>
</tbody>
</table>

**Summary of consultation response:**

NPPF section 16 and the London Plan (2011 Policy 7.8) make the conservation of archaeological interest a material planning consideration. NPPF paragraph 189 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

If you grant planning consent, paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

The planning application lies in an area of archaeological interest.

The site has been subject to an archaeological foreshore survey recently and fieldwork close by strongly suggests that deeply buried remains would not be harmed by the scope of works proposed. Post-mediaeval deposits connected with the pre-industrial use of the site have been encountered during archaeological monitoring at the Tarmac site next door and the proposed drainage works may reveal more. The site appears to have been in use during the eighteenth century, indicated by these results and a waterside gibbet shown on contemporary mapping.

I therefore recommend an archaeological watching brief on the drainage scheme, secure by condition.

I have looked at this proposal and at the Greater London Historic Environment Record. I advise that the development could cause harm to archaeological remains. However the significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition. I therefore recommend the following condition on any consent:

**Condition**

No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and
research objectives, and

A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative
The written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England’s Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 199.

The archaeological work should include:

Watching Brief
A watching brief involves the proactive engagement with the development groundworks to permit investigation and recording of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

You can find more information on archaeology and planning in Greater London on our website.

This response only relates to archaeology. You should also consult Historic England’s Development Management on statutory matters.

Officer comments on consultation response:
There is no significant excavation on site and therefore there is no requirement for WSI.

Consultee: Designing Out Crime Officer, Metropolitan Police Service
Date received: 25 March 2019
Summary of consultation response:
Thank you for allowing our office to comment on the above. Having reviewed the information available on the planning portal we were unable to find reference to site security and crime preventions measures within the DAS and require further information.

**Without further information on the proposed security and crime prevention measures for this site we are currently unable to support this application.**

Please see Appendix 2 for further explanation.

**Appendix 1: Local Policy**

**The National Planning Policy Framework (NPPF)**

**Section 8** - "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion".

**Section 12** - "Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience"

**Newham Local Plan 2018**

**Core Policy SP3 Quality Urban Design within Places**

2a - Any new development, town centers, public spaces, transport hubs and streets should incorporate the principles of and achieve Secured By Design (SBD) accreditation; and

b - Designs should be accompanied by sufficient technical and financial detail to demonstrate that a satisfactory design quality will be realised and sustained, including provision for continuity of the project architect to completion stage, and details of proposed public realm and open space management and maintenance.

**Section 17 of the Crime and Disorder Act 1988**

“It shall be the duty of each Authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all it reasonably can to prevent Crime and Disorder in its area”, as clarified by PINS953.

19.3 - Section 17 of the Crime and Disorder Act 1998 places a duty on local authorities to do all they can to reasonably prevent crime and disorder in their area. Reducing crime is therefore not solely the responsibility of the Police.

19.6 - The design and layout of the physical environment is key to creating safe environments and reducing crime and disorder. ‘Designing out crime’ and designing in community safety should be core principles in planning any new development, town Centre’s, public spaces, transport hubs and streets..
19.14 - The Council will ensure that community safety measures are implemented in the Borough by ensuring that planning applications for new developments demonstrate how a development will incorporate the principles and practices of ‘Secured by Design’ and ‘Designing out Crime’. Such measures could be highlighted through a supporting planning statement or design and access statement. These considerations will be particularly important in new schemes.

Informative:
We would advise all applicants to seek crime prevention advice prior to submitting a planning application. The services of MPS Designing Out Crime Officers (DOCO) are available free of charge and can be contacted via Docomailbox.NE@met.police.uk or during office hours via Telephone: 0208 217 3813.

Appendix 2: Site Specific Comments

The Design and Access Statement (DAS) should include how crime prevention measures have been incorporated. See Appendix 1.

Crime types that we have identified as being a risk within this site, which must be considered and mitigated against are:

1. Trespass
2. Criminal Damage
3. Theft
4. Burglary
5. Arson

The following is taken from the submitted DAS for this application:

2.6 - The Design and Access Statement (DAS) considers the design, access, landscape/biodiversity, heritage, lighting and community involvement issues. Noise, traffic, air quality and flood risk assessment are separately assessed in standalone documents and referred to in the Planning Statement.

We noted the following additional references within the documents:

Cycle storage:
We noted ‘A secure cycle parking area will be provided within this area’. However within the drawings submitted we could only find an area marked as ‘Open bike rack’. In our opinion an open bike rack is not adequate in offering a secure cycle parking solution. We would like to see further information on what measures are in place to reduce the risk of the theft of cycles with this area.

Office space:
We note the use of ‘Modular buildings’, however no reference is made to the proposed security measures within the offices or within the construction process, or reference to how secure access will be provided to prevent
Boundary, Fencing & Access control:
We found mention of previous a planning application in 2010 which lists reasons for acoustics within the boundary treatment. We could not find mention of a security assessment of the current/proposed site boundary treatment or how measures will be put in place to ensure the security of the site. We also were unable to find mention of how secure vehicle and pedestrian access will be controlled and managed.

2.4 - The north eastern boundary fence is formed of 3m high concrete panels and the south eastern boundary includes concrete panels which change to steel palisade fencing close to the river. Presently herras type fencing marks the boundary between the new aggregate handling wharf and the proposed development site on the north western boundary. Condition 9 of planning permission 07/01816 required details of the boundary fencing and its acoustic properties to be submitted prior to commencement. The details approved on 24th August 2010 were for a 2.4m high galvanised steel palisade fence constructed from vertical steel angled bars set at approx. 150mm centres. The details concluded that the noise assessment did not take account any screening effect of boundary fencing and had concluded that noise sensitive receivers would not be impacted and therefore fencing with acoustic properties was not appropriate.

If you wish to discuss this matter further or require any additional information please do not hesitate to make contact with either myself or the North East DOCO office.

Officer comments on consultation response:
See further consultee representation below

Consultee: Designing Out Crime Officer, Metropolitan Police Service
Date received: 08 April 2019

Summary of consultation response:
Thanks for sending over the addition information provided by the developer, regarding the proposed security of the site. Although the development site seems quite isolated at the moment, the future development within the neighbouring area will change this dynamic. We would like to ensure the site has an adequate physical security in place, as just relying on CCTV will not prevent it from being exploited by opportunist criminal activities, or slow down entry by criminals targeting the site.

The information within the document offers a generic insight to the general security intentions, however we are not satisfied the physical security of the boundary meets our normal minimum requirements of a secure boundary.

We would like to see further clarification/ and/or details on the following:

1. We are not sure if the site has 24/7 security staff or if it is proposing to
have 24/7 monitored CCTV off site. Having a dedicated 24/7 security
comes at a high cost and cannot be guaranteed to remain for the lifetime
of the development/site – It often withdrawn when site costs are
reviewed. Having a secure boundary is essential for providing
sustainable security measure.

2. We could not find details on the type, height or materials to be used for
the proposed vehicle & pedestrian gates (what security measure will be
incorporated within the design). It appears from the document the
vehicle gates will be open during operation hours - how will vehicles and
visitors be monitored or restricted when entering & leaving.

3. The boundary fencing is a mix of brick and palisade which will have
additional scaffolding dust sheets added – we have concerns that the
varied heights and mixed materials being used can created climbing
opportunities. Some styles of palisade fencing can be easily
manipulated to gain entry it is not clear if a risk assessment had been
done for the existing palisade. The area’s most at risk will be boundaries
with public access along roads/footpaths.

I am not sure if it is in your power to add a condition regarding the
developments security measures for, the boundary and site entrance, but
the following could be an option if you want to progress with approval and
leave the finer details to us to formulate with the developer then send to you
for approval/release the condition:

1. Details of the measures to be incorporated into the development
demonstrating how the local ‘Commercial - Secured by Design’ security
standards, have been included in the final build specifications, shall be
submitted to and approved in writing by the Local Planning Authority. Once
approved in writing by the Local Planning Authority in consultation with the
Metropolitan Police Designing Out Crime Office, the development shall be
carried out in accordance with the agreed details.

Informative:
The applicant must seek the advice of the Metropolitan Police Service
Designing Out Crime Officers (DOCOs) and notify this office of any changes
to the planning application or approved scheme relevant to security or
design layout. The services of MPS DOCOs are available free of charge and
can be contacted via Docomailbox.NE@met.police.uk or during office hours
via Telephone: 0208 217 3813

Officer comments on consultation response:
Second Representation. See further consultee representation below

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<tr>
<th>Consultee:</th>
<th>Designing Out Crime Officer, Metropolitan Police Service</th>
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<tr>
<td>Date received:</td>
<td>9 May 2019</td>
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<tr>
<td>Summary of consultation response:</td>
<td>‘Sorry for the delay in our response - I have received an update from the</td>
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</table>
Marine Police Unit, MO7. They have no additional comments to this proposal and the impact it may have on the area/waterway.

In response to the Agents comments:

Normally we would look to find a security needs assessment for commercial developments, which identifies any areas of risk to the site and details the appropriate mitigation measures to reduce the likelihood of the site becoming a target for criminals. The assessment usually cover any areas that we would automatically identify as vulnerable and shows precise details how the risk will be reduced. Once confident appropriate measures have been considered we normally have no additional comments to make.

Our intention is not to add a condition if you do not feel it necessary, however if required we are happy to assist you when doubt over appropriate measure are unclear. If you believe the agent has now covered enough security detail to satisfy the highlighted concerns we have, in order to protect the site and its functions, then we leave the decision with you, to grant the relevant permissions.

If you feel it appropriate please could pass the following general police advice onto the Agent, in response to their additional comments. It may encourage them to review and enhance the security measures proposed, which in our opinion would be proportionate to the crime risk. I have also attached a few Home office document that they may find helpful if reviewing or installing security measures onto the site, as it is not clear what level of security experience or knowledge the Agent has.

1. Appropriate entry signage promoting the CCTV coverage can reduce the risk of trespass, this should be enhanced with lighting and a monitored security alarms on buildings/storage huts containing items of value.

2. We do not recommend that a site solely rely on exiting neighbouring choices of boundary treatments, as this does not always offer adequate protection. As previously stated areas most at risk are boundaries with public access along roads and footpaths, so the risk to this site is less than its neighbours who’s site bound the public domain. As previously stated some older types of Palisade style fencing is easily manipulated. We find that criminals involved in residential and commercial burglaries are not put off going through a neighbouring property to reach their desired target. Where boundary treatments do not offer adequate protection additional secure measures should be incorporated.

3. If the proposal is to add a palisade type vehicle gate, this must be enhanced a with a mesh backing to avoid foot holds for climbing and easy manipulation of the gates construction, especially around the locking /sliding bolts which are usually used to keep double leaf gate together and fixed in place when close. The hinges should be fitted with anti-tamper fixings and be anti-lift to avoid the gates being taken off/ lifted to gain entry.
4. Using a padlock and chain to secure your gates is probably the most common way to lock an outdoor gate however it’s also one of the least secure. Padlocks can easily be cut or pried off, as can the chain or hasp that is holding them, therefore we would advise using locking products that are security tested to a minimum of a ‘Sold secure – Gold standard’.

**Officer comments on consultation response:**
Third representation – Officers have not recommended a condition in this instance due to its non-street facing location this is not considered to be reasonable.

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<tr>
<th>Consultee:</th>
<th>Canal &amp; River Trust</th>
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<td><strong>Date received:</strong></td>
<td>27 March 2019</td>
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**Summary of consultation response:**
The following response was received.

“Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is that the Trust has no comment to make on the proposal”.

**Officer comments on consultation response:**
Representation noted.

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>Highways England</th>
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<tr>
<td><strong>Date received:</strong></td>
<td>29 March 2019</td>
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**Summary of consultation response:**
The following responses were received:

**Email response:**

“Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN). In the case of this proposed development, Highways England is interested in the potential impact that the development might have on the A13 in particular.

After looking through the documents provided, it is evident that this development will not result in any increase in vehicular movements. Therefore, Highways England have no objection to this application as it will not have a material impact on the SRN.”

**Letter:**

“Highways England Ref: #84145
Referring to the notification of a planning application dated 12 March 2019 referenced above, in the vicinity of the A13 that forms part of the Strategic Road Network, notice is hereby given that Highways England’s formal recommendation is that we:

a) offer no objection*;
*This is on the basis that the proposals will generate minimal additional traffic on the SRN in Peak Hours. We therefore consider that the development will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT C2/13 para 10 and DCLG NPPF para 109), in this location.

b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);

Highways England Planning Response (HEPR 03-19) March 2019

c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);

d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).

Highways Act Section 175B is not relevant to this application.1

HIGHWAYS ENGLAND (“we”) have been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This represents Highways England’s formal recommendation and is copied to the Department for Transport as per the terms of our Licence. Should the Local Planning Authority disagree with this recommendation they must consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2015, via transportplanning@dtf.gsi.gov.uk

Officer comments on consultation response:
Representation noted.

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<th>Consultee:</th>
<th>Environment Agency</th>
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<td>Date received:</td>
<td>2 April 2019</td>
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<tr>
<td>Summary of consultation response:</td>
<td>Thank you for consulting us on the above application. In the absence of an</td>
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acceptable Flood Risk Assessment (FRA) we object to this application and recommend that planning permission is refused for the following reasons:

**Reasons**
The FRA as submitted does not adequately assess the flood risks posed by the development with regards to flood defences, and does not, therefore, comply with the requirements National Planning Policy Framework (NPPF) paragraph 163, or Policy S3 Flood Risk, or your local plan. In particular, the FRA fails to:

- Provide drawings of the proposed wharf structure, or any details on the current structure and condition of the river wall (flood defence).
- Demonstrate that the proposed design provides sufficient horizontal and vertical access to carryout inspections and maintenance work, or any essential future raising of the flood defences in line with the TE2100 plan. This is in with Policy 9.12.3 of the London Plan.

**Overcoming our objection**
To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above. If this cannot be achieved, we are likely to maintain our objection.

**Advice to Local Planning Authority**
If you are minded to approve the application contrary to our objection, I would be grateful if you could re-notify the Environment Agency to explain why, as we will need to make further important representations with regards to waste and contaminated land.

Once again, thank you for contacting us. Our comments are based on our available records and the information as submitted to us. Please provide us with a copy of the decision notice for our records.

**Officer comments on consultation response:**
Officers note there is no objection in principle. The recommendation to the Committee seeks delegated approval to further consider the representation from the EA.

### Consultee: Port of London Authority
### Date received: 3 April 2019

**Summary of consultation response:**
Thank you for your letter dated 11 March 2019 concerning the above planning application.

As you will be aware, the PLA is the owner of the safeguarded Peruvian Wharf which encompasses the application site. Application 18/03543/FUL by Keltbray Ltd proposes to maximise the use of the downstream part of Peruvian Wharf (known as Plaistow Wharf) for waterborne cargo handling through the relocation of its existing operations at Thames Wharf 800m south to Plaistow Wharf. This is necessitated by the Silvertown Tunnel.
The PLA is fully supportive of Keltbray’s application which would reactivate
the downstream part of the safeguarded wharf for the purpose for which it is
safeguarded and result in waterborne cargo handling taking place on this
part of the wharf for the first time in over twenty years.

Brett Aggregates Limited occupy the upstream part of the wharf and will
commence waterborne cargo handling operations later this year.

Policy Background

The extant and draft London Plan both seek to increase the use of the Blue
Ribbon Network to transport freight. Safeguarded wharves are protected for
waterborne cargo handling uses only. Keltbray’s proposal fully accords with
London Plan safeguarded wharves policy with between 150,000tpa to
200,000tpa of waste being proposed to be exported by river. Material would
be transported in barges with a capacity of either 1,000t or 2,000t, resulting
in barge movements from the wharf between two and five times per week.

The proposed development fully accords with the Safeguarded Wharves
Review (2018) which identifies that Keltbray’s current operations will need to
relocate as a result of the Silvertown Tunnel Scheme and identifies the
potential for wharf consolidation to occur within Newham.

The proposed development also fully accords with the adopted Newham
Local Plan (2018) which, as part of the Royal Docks Spatial Strategy, Policy
INF1, Policy J2 and Site Allocations S07 and S08 designates the land as
Strategic Industrial Land and seeks the reactivation, relocation and / or
consolidation of Thames, Peruvian, Manhattan, and Sunshine Wharves on
Peruvian and Royal Primrose Wharves with no net loss of functionality or
wharf capacity.

The relocation of Keltbray’s operations from Thames Wharf to Plaistow Wharf
would, in conjunction with the safeguarding and reactivation of Royal
Primrose Wharf, result in the long standing strategic policy objective which is
now adopted within Local Policy of wharf consolidation to be fully realised.

Environment

The application states that the development will have SUDS and the
drainage plan indicates a sealed sump and interceptor. A River Works
Licence will be required for any works over Mean High Water.

It is noted that lighting will be directed downward and this is welcome as
inappropriately angled lighting and light spill can affect flying mammals and
river ecology. It is recommended that a condition on any grant of planning
permission requires full details of all external lighting to be submitted and
approved.

If any wastes are likely to generate litter there should be measures in place
to prevent any litter entering the river. It is recommended that a condition on
any grant of planning permission requires the submission and approval of a litter management plan.

Planning Conditions

It is imperative that any planning consent reflects the site’s strategic allocation and policy support as a Wharf and does not seek to unnecessarily constrain the wharf, either in terms of hours of operation or duration of consent. In particular hours of operation for the wharf need to be 24 hours a day, 7 days a week due to the tidal nature of the River Thames and a full planning consent is required to reflect the strategic nature of this site and its site allocations.

Finally it is recommended that a condition on any grant of planning permission requires the submission and approval of riparian life saving equipment.

Officer comments on consultation response:

Officers recognises the requirement for 24 hour access to the wharf. Officers requested a Site Working Plan which addresses the concerns over waste and light spillage. This is subject to a condition at Appendix 1.

Consultee: Greater London Authority Stage 1 Response
Date received: 1 July 2019

Summary of consultation response:

Strategic issues summary
Principle of development: The introduction of waste processing uses would sustainably intensify this unused SIL site in an Opportunity Area and positively contribute to construction, demolition and excavation waste processing capacity, which is strongly supported. The intensification of waterborne freight handling use on this safeguarded wharf is also strongly supported (paragraphs 16-21).

Urban design: The proposal is appropriately designed for the context of surrounding industrial uses and the Council should confirm if the noise impacts are acceptable (paragraphs 22-24).

Environment: The energy proposals should be reviewed and further information on the level of carbon savings is required. The Flood Risk Assessment should be revised to provide for future defence maintenance and raising in line with the Thames Estuary 2100 plan and the proposal does not meet non-residential water consumption targets (paragraphs 25-28).

Transport: A Road Safety Assessment is required. The application should contribute towards works and/or funding to mitigate the impact of its transport movements on the local highway network. An explanation for the level of car parking must be provided or the applicant should reduce the number of spaces. Electric vehicle charging points and information on the number of cycle parking spaces must be provided. A Travel Plan should be secured, monitored, reviewed, and enforced through the S106 agreement. A
Delivery and Servicing Management Plan and a Construction Management Plan should be secured by condition (paragraphs 29-33).

**Recommendation**
That Newham Council be advised that while the application is generally acceptable in strategic planning terms the application does not comply with the London Plan and the draft London Plan, for the reasons set out in paragraph 37 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

**Officer comments on consultation response:**
The applicant has been working with LBN and the GLA to address these concerns – any concerns not satisfactory can be addressed at Stage 2 of the GLA’s Review or via a condition.
- Energy matters will be addressed at Stage 2.
- A Road Safety Assessment has been submitted.

### 4.14 Internal Consultation

### 4.15 A summary of the consultation responses received along with the Officer comments are set out in the Table below.

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>LBN Urban Design &amp; Conservation</th>
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<tr>
<td>Date received:</td>
<td>16 May 2019</td>
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<tr>
<td><strong>Summary of consultation response:</strong></td>
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| "As discussed, there is very little in the way of detail in the application. Presumably they are going to need to put in fences road surfaces and other hard standing area. We should also seek elements of planting to soften the appearance of the site and for biodiversity etc. I think we need a landscaping plan which should reference the GLA Royal Docks materials palette (attached) in terms of surfaces, fencing, lighting etc. The detail could be conditioned but there needs to be a site-wide strategy included in the application.

The modular office building is functional in appearance but due to its location this doesn’t necessarily present a significant issue. Its appearance could be improved and related back to other industrial buildings in the vicinity by incorporating profiled metal cladding.” |

| **Officer comments on consultation response:** |                                                            |
| Due to the location and the site having no street facing frontage officers consider that no further conditions or details are required. However, officers note that for any further works such as fencing which do not fall within the scope of this application a separate planning application may be required. |

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<tr>
<th>Consultee:</th>
<th>LBN Environmental Health</th>
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<tr>
<td>Date received:</td>
<td>7 May 2019</td>
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<td><strong>Officer comments on consultation response:</strong></td>
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Suggested conditions to be imposed if approved:

1. **Enclosure of on-site activates (subject to approval with no time limited consent)**

Prior to commencement of the development hereby permitted, a full site enclosure plan shall be submitted to and approved by the Local Planning Authority. The plan shall include a building that encloses all onsite activities with a minimum specification of a roof and 4 sides with the smallest practicable entry/egress points. Each entry/egress must maintain a fast acting door or fixed water suppression with the function of preventing elevated dust from escaping the site boundary.

2. **Airborne asbestos fibre reassurance sampling (subject to time limited approval without enclosure of onsite activists)**

Prior to commencement of the development hereby permitted, an airborne asbestos fibre site monitoring strategy for the operational phase of the development shall be submitted to and approved by the Local Planning Authority. The strategy shall include a proposed sampling location, sampling frequency, sampling rate, minimum sample volume, graticule areas to be examined versus the limit of quantification.

For the duration of the permitted development the operator shall maintain records of all agreed monitoring including records of the taking and analysis of samples, airborne concentration results, calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data. On the request of the local planning authority, this information shall be made available within a reasonable time.

The air quality sampling laboratory shall be accredited for asbestos sampling by a UKAS or equivalent accreditation body.

3. **Wheel washing facilities**

Prior to commencement of the development hereby permitted, details of a drive through wheel washing facility shall be submitted to and approved by the Local Planning Authority. The approved scheme shall precede a hard-standing connection to the public highway and is to be maintained for the duration of the activity for all vehicle exits from the site. Private motor cars shall be excluded from this provision.

4. **Consolidated Surfacing**
All areas designed to accommodate vehicle movement shall have a consolidated surface capable of being cleaned, and these surfaces shall be kept clean and in good repair.

5. Site specific reverse alarms

All vehicles used on or otherwise serving the site where the use of a reverse alarm is required must be fitted with a white noise reverse alarm or an equivalent system.

6. Road sweeping

For the duration of the development hereby permitted, a water-assisted dust sweeper must be deployed on the access road during each day of onsite activates. Additional road sweeping must be provided where material is visibly tracked out of the site or spillages occur on adjoining roads.

7. Hours of operation

There shall be no works carried out on the site except between the hours of 0800 and 1800 on Mondays to Fridays and between 0800 and 1800 on Saturdays without the prior written approval of the Local Planning Authority. Dock load out and loading at high tide and associated enclosed storage of materials shall be excluded from this provision.

8. H08A Air Quality Condition (Subject to approval with no time limited consent. AQ report to scope in cumulative impact of Plaistow Wharf, Peruvian Wharf and service road on masterplan area).

Before commencement of the development, an air quality report shall be submitted to and agreed by the Local Planning Authority. The report shall detail:

- the area within the boundary of the site, which may exceed relevant national air quality objectives.
- specify how the detailed application will address any potential to cause relevant exposure to air pollution levels exceeding the national air quality objectives.
- identify areas of potential exposure.
- detail how the development will reduce its impact on local air pollution.
Regard shall be had to the guidance from the London Councils "Air quality assessment for planning applications – Technical Guidance Note” in the compilation of the report available at [www.londoncouncils.gov.uk/node/25533](http://www.londoncouncils.gov.uk/node/25533)

Reasons: To protect the amenity of future occupants and/or neighbours and in the interest of the declared Air Quality Management Area and in accordance with London Borough of Newham Local Plan Core Strategy Policy SP2 and Detailed Sites and Policies DPD SP8 and SP9

9. **H11 Acoustic report** (Subject to approval with no time limited consent. Noise report to scope in cumulative impact of Plaistow Wharf, Peruvian Wharf and service road on masterplan area).

Prior to the commencement of works on the development hereby permitted, an acoustic report shall be submitted to and approved by the Local Planning Authority. Plant operation and activity on site shall not give rise to a BS4142 rating level greater than the background level at the nearest or worst affected property. Where it is considered impractical to meet this noise standard the report should detail mitigation measures taken to reduce noise to a minimum.

The approved scheme shall be implemented prior to occupation of the development and shall be permanently maintained thereafter. The developer shall certify to the local planning authority that the noise mitigation measures agreed have been installed.

Reasons: To protect the amenity of future occupants and/or neighbours and in accordance with London Borough of Newham Local Plan Core Strategy Policy SP2 and Detailed Sites and Policies DPD SP8

10. **Air Quality, Site specific non-road mobile vehicles (NRMM)**

During onsite construction works, all non-road transportable industrial equipment or vehicles which are fitted with an internal diesel powered compression ignition engine between 37 and 560KW and not intended for transporting goods or passengers on roads are required to meet Stage IIIA of EU Directive 97/68/E and be NRMM registered. Such vehicles must be run on ultra low sulphur diesel (also known as ULSD 'cleaner diesel' or 'green diesel'). "Ultra low sulphur diesel" means fuel meeting the specification within BS EN 590. Where these standards are succeeded, they should be applied no later than 1 year after succession.

Exemptions to these standards may be granted for specialist equipment or
for equipment with alternative emission reduction equipment or run on alternative fuels. Such exemptions shall be applied for in writing to the LPA in advance of the use of such vehicles, detailing the reasons for the exemption being sought and clearly identifying the subject vehicles. Exemptions that are granted will be in writing and such vehicles must not be used until written exemption has been received by the applicant.

No vehicles or plant to which the above emission standards apply shall be on site, at any time, whether in use or not, unless it complies with the above standards, without the prior written consent of the local planning authority.

Reasons: To protect the amenity of future occupants and/or neighbours in accordance with policy 5.2-5.7 of the London Plan 2016 and EQ45 of the London Borough of Newham Unitary Development Plan (adopted June 2001).

Recommended informative(s) to pass on to the applicant:

1. Environmental Permitting (England and Wales) Regulations 2016 (As Amended)

The proposed activities associated with the application will be subject to the requirements of the Environmental Permitting Regulations. The Regulations require the operator (i.e. the person/company who wishes to carry out the prescribed activity) to apply to the relevant regulating authority for an operating permit.

For the purpose of the regulations, the Environment Agency regulates air emissions from waste operations that are not controlled by emission limits. Carrying out a prescribed activity without an operating permit is an offence under the above regulations. The applicant is advised to contact the Pollution Control Unit on 020 8430 2000 for information and advice. See also www.defra.gov.uk and www.environment-agency.gov.uk.

Other comments to Planning Officer:

1. Permitted wastes under Environmental Permit

The applicant has applied to the Environment Agency for an inert/non-hazardous and hazardous waste installation permit.

The hazardous wastes are classified as metal waste contaminated with hazardous substances, soil (including excavated soil from contaminated sites) stones and dredging spoil, soil and stones containing hazardous...
substances, other construction and demolition waste (including mixed wastes) containing hazardous substances.

Wastes containing asbestos are not permitted. Loads are rejected if asbestos at a visible size to the human eye. There is no in-situ asbestos fibre sampling.

2. Site Enclosure and asbestos sampling

The London Borough of Newham is currently engaged in a process of declaring the whole borough (including the application site) as an Air Quality Management Area (AQMA). This declaration would likely occur before completion of the proposal. This will require additional air quality controls on the development.

The site is located adjacent to a masterplan neighbourhood which would increase the risk of exposure to elevated dust from the development.

The operator has applied for an environmental permit that permits the acceptance of hazardous wastes including contaminated soils. Open air dust management techniques can not eliminate the risk of dust exposure on neighbouring sites.

Wastes containing asbestos are not permitted on site and periodic off site soil sampling for asbestos fibres are undertaken. Asbestos loads are only rejected in-situ if at a visible size and no asbestos fibre sampling is undertaken once in-situ. Considering the nature of the operation and the handling of contaminated demolition soils, there may be undetected asbestos fibres within loads that are unintentionally accepted.

If a time limited consent is granted without an enclosure, airborne asbestos fibre sampling on the site boundary is recommended to assess the risk of any long-term exposure on the masterplan area.

3. Cumulative Impact on masterplan area

The application does not address the cumulative environmental impact of the combined wharfs on the masterplan area to the east of the site. If the application is granted without a time limited consent, I recommend a further noise; air quality and transport assessment is submitted to determine any adverse effects on the masterplan area.

4. Air Quality
I recommend Section 6 of the Air Quality report (operational dust mitigation measures) is revised to specify detailed dust management techniques to be maintained at the operational phase of the proposed development.

There are certain operational activities that are typically not covered by an environmental permit condition i.e. a requirement to cover of all operational vehicles entering and leaving site to prevent escape of materials during transport. It is recommended further dust controls are agreed in more detail within the application.

Officer comments on consultation response:
See representation and officer comments below.

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>LBN Environmental Health</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>29 May 2019</td>
</tr>
</tbody>
</table>

Summary of consultation response:

1) I agree with the proposed asbestos monitoring plan. If the application is granted I recommend a condition is included to ensure the plan is implemented for the duration of the activity, as specified in our previous comments.

2) Re enclosure; I draw your attention to the [London Environment Strategy](#) (adopted May 2018). Proposal 4.2.3.e (Page 96) specifies;

   “Some waste and industrial activities have the potential to cause local dust and particulate pollution by the nature of the work that they undertake. The potential for these sites to cause pollution can be greatly reduced by moving dusty activities indoors. Working indoors can also have other benefits, such as reducing the amount of water used for dust suppression.”

I also draw your attention to [policy SI8 para. ‘D’ of The Draft London Plan](#) that specifies;

“Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria:… where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed”.

The SLR Air Quality assessment (422.08488.00001) specifies that “The effects of the proposed development on air quality are ‘not significant’. However, the report does not scope in the environmental impact of the proposal on the neighbouring masterplan neighbourhood to the east.
I recommend either:
   A) A full enclosure plan is submitted
   B) The developer submit a further air quality assessment that
demonstrates the air quality impact of the development on the
masterplan area will not be significant.

If you need any further assistance let me know.

Officer comments on consultation response:
The applicant has submitted a further air quality assessment. See next set
Environmental Health Representation below.

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>LBN Environmental Health</th>
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</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>14 June 2019</td>
</tr>
</tbody>
</table>

Summary of consultation response:
The AQA has scoped in the masterplan area and states that the effects of
the proposed development on air quality are ‘not significant’.

The London Plan and Environment strategy only specify covering for
significant air quality impacts and so enclosure is not justified in this case.

The EA has granted the applicant an environmental permit and this would
require the operator to work with the EA to maintain a dust management
plan as part of their environmental management system.

There are areas of dust control that may not be enforced under the permit
however. This includes stockpile heights, hardstanding surfaces for all
areas of vehicle movement, a wheel wash and road sweeping on the
access road. It is recommended appropriate planning controls are in place
where not covered in the permit.

Officer comments on consultation response:
See next representation and officer response.

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>LBN Environmental Health</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>27 September 2019</td>
</tr>
</tbody>
</table>

Summary of consultation response:
“I agree with the proposed conditions and the site working plan which covers
my previous comments.”

Officer comments on consultation response:
The above comments were made following the submission of a Site Working
Plan with captures a number of key matters raised by Environmental Health.
The Site working Plan is subject to a condition set out at Appendix 1.
Otherwise any pertinent matters not covered by the Site Working Plan are
subject to separate conditions at set out at Appendix 1.
Consultee: Lead Local Flood Authority (LLFA)
Date received: 27 March 2019

Summary of consultation response:

'LLFA’s response: objection: reviewed submitted and related documents the LLFA is not clear on the following:

- What aspect of the site is being developed: the FRA and appendices provide maps of potential drainage schemes for both Plaistow Wharf and adjacent Peruvian Wharf with provision of geo-cellular attenuation or similar.
- The FRA dismisses the requirement of SUDS whilst the application forms states that SUDS are to be implemented.
- A proposed drainage layout map was submitted relevant to the Plaistow wharf red line only is however inconsistent with what found in the FRA appendices.( different outfall, no SUDS only interceptors)

LLFA notes that the geotechnical investigation identifies ruderal drainage on site mostly in disrepair plus a number of concrete foundations that could constitute obstacles for what at this stage is a speculative proposal.

At full application a clear drainage scheme proposal is required, this should explicitly address requirements which, because the nature of proposed site operations, must include water quality of the discharge to the river, besides on site flood risk in form of an acceptable degree of attenuation. What submitted at this stage is unsatisfactory and does not allow LLFA’s determination.

Below is suggested condition - as back up - pending a clear proposal allowing an assessment:

H21 Surface Water Drainage Detail

a) No development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority.

b) Detail of the proposed drainage scheme should include:

(i) Provision of water quality measures in regard to surface water river discharge.

c) Detail of ownership, management and maintenance arrangements shall be submitted to Planning Authority for approval before site occupation.

d) The Drainage Scheme shall subsequently be implemented in
accordance with the approved details before the development is completed.

e) A verification report stating what works were undertaken and completed in accordance with the approved Drainage Scheme shall be submitted and approved by the Local Planning Authority in writing before occupation of the development.

Reason: To safeguard the public from surface water flood risk, protect the environment and respond to climate change. With regard to policy SC3 of Newham Local Plan 2018; Policy 5.3, 5.12, 5.13, 5.14 of the London Plan (July 2011) and Supplementary Planning Guidance (SPG) on Sustainable Design and Construction; Policy 103 and 109 of NPPF; London Borough of Newham Surface Water Management Plan (SWMP) and Local Flood Risk Management Strategy (LFRMS)."

<table>
<thead>
<tr>
<th>Officer comments on consultation response:</th>
</tr>
</thead>
<tbody>
<tr>
<td>See next representation and officer response.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>Lead Local Flood Authority (LLFA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>23 April 2019</td>
</tr>
</tbody>
</table>

**Summary of consultation response:**

"Noted response by applicant, I accept that ‘an assessment of the hydrological and hydro geological context of the development’ as part of suggested condition would not be necessary – that is part of a general standard condition applied to scheme that are not sufficiently defined. However proposal needs to be clear and interposed comments responding to LLFA comments – where applicable - need to be put together in a proper statement to make the proposal intelligible – it is not in the submitted documents therefore conditioned on the basis of an approved scheme.

the LLFA is responsible for flood risk and sustainable drainage regardless of the EA’s permit – the requirement is for a SUDS scheme and this need to be approved by the LLFA – not by the EA. So applicant will need to indulge LLFA’s requirement and provide a clear SUDS scheme, which entails attenuation and water quality requirement as discharging to the river. It seems that reply entails that proposal has no obligation to attenuated post development discharge since this is to river, this is incorrect. Whilst the LLFA would not insist on strict requirements of minimum requirements (3 greenfield) as per Local Plan; attenuation is required.

Approval of ownership, management and maintenance is totally relevant and material planning consideration - in fact approval of all SUDS scheme requires those provisions, therefore existence of standard planning conditions which applies to all major development proposals.

This is under concerns of the LLFA’s role as statutory consultee according to FWMA 2010, London Plan, Local Plan and Newham Local Flood Risk management Strategy."
Therefore my objection still applies until concerns adequately addressed.”

**Officer comments on consultation response:**

Officers note the above comments – further information was sought from the applicant to address these concerns and they are assessed further by the LLFA below.

**Consultee:** Lead Local Flood Authority (LLFA)

**Date received:** 1 July 2019

**Summary of consultation response:**

“LLFA Response;

Viewed additional evidences – yet to be uploaded on Public Access under above planning reference, my response is that the report as referenced in the suggested planning condition below, would sufficiently address LLFA’s concerns and warrant progressing application to AOD applying the same condition.

H21c) Surface Water Drainage Detail

a) No part of the development hereby permitted shall be commenced until a fully detailed surface water management scheme for the development, consistent with Drainage Strategy & SUDS Report (Ref. KEL Project: Plaistow Wharf SUDS - 14/05/2019), has been submitted to and approved in writing by the Local Planning Authority.

b) Detail of the proposed drainage scheme should include:

(i) Provision of water quality measures in regard to surface water river discharge.

c) Detail of ownership, management and maintenance arrangements shall be submitted to Planning Authority for approval before site occupation.

d) The Drainage Scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

e) A verification report stating what works were undertaken and completed in accordance with the approved Drainage Scheme shall be submitted and approved by the Local Planning Authority in writing before occupation of the development.

Reason: To safeguard the public from surface water flood risk, protect the environment and respond to climate change”

**Officer comments on consultation response:**

As officers are satisfied with the submitted details it is not considered that the suggested condition will be reasonable or necessary.
<table>
<thead>
<tr>
<th>Consultee:</th>
<th>LBN Waste management</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>14 April 2019</td>
</tr>
<tr>
<td>Summary of consultation response:</td>
<td>‘I have gone through all the relevant document and proposal for waste storage, collection and transport at this site and they are satisfactory. However the applicant should be required to have a clean-up contingency plan in place should the need for road transportation of the waste arise. It is common to have debris or detritus on the public highway especially around the entrance and exit of the site(s) when such works are going on.’</td>
</tr>
</tbody>
</table>

| Officer comments on consultation response: | A Site Working Plan has been submitted with the application which addresses the query regarding litter/waste spills. |

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>Transportation Team</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>8 April 2019</td>
</tr>
<tr>
<td>Summary of consultation response:</td>
<td>“Relocation of waste transfer use from Thames Wharf to Plaistow Wharf and redevelopment pf vacant wharf, comprising the construction of stock bays for storage construction, demolition of excavation waste, incorporating a sustainable drainage system, widening of the wharf landing area, storage and fabrication for civil engineering projects and erection of weighbridge, office facilities and associated infrastructure. Further to our meeting this morning the proposed development in principal of its use is acceptable along with the general principles of attached Transport Statement prepared Cannon Consulting Engineers (CCE) on behalf of Keltbray Ltd. However, I feel the submitted application in this case is premature as there is no account of Masterplanning of surrounding sites which need to be taken into account, especially in line with LBN Local Plan. Once this information is submitted Transportation and Highways will be able to make more comprehensive comments on then submitted application.”</td>
</tr>
</tbody>
</table>

| Officer comments on consultation response: | Officers requested that Transport is assessed in more detail within the Masterplanning Statement – An Addendum has been provided and further LBN Transport comments have been made below. |

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>LBN Transport</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>12 August 2019</td>
</tr>
<tr>
<td>Summary of consultation response:</td>
<td>“The proposal is for the relocation of waste transfer use from Thames Wharf to Plaistow Wharf and redevelopment of the vacant wharf, comprising the construction of stock bays, for storage of construction, demolition and excavation waste, incorporating a sustainable drainage system, widening of</td>
</tr>
</tbody>
</table>

London Borough of Newham
the wharf landing area, storage and fabrication for civil engineering projects and erection of weighbridge, office facilities and associated infrastructure.

Applicant has submitted a Transport Statement (TS) prepared by Cannon Consulting Engineers (CCE) appointed by Keltbray Ltd in respect of a planning application for the proposed relocation of their existing operations as a Wharf for storage and shipping of waste streams from construction excavation and demolition waste, and storage of other construction materials at Thames Wharf, Dock Road, Silvertown, London E16 1AF to Plaistow Wharf, North Woolwich Road, E16 2AB.

Development Site and Accessibility
Plaistow Wharf is located adjacent to the River Thames, is accessed from Dock Road, and connects to the wider Highway Network either at the Lower Lee Crossing Roundabout or to the south via Dock Road and North Woolwich Road. West Silvertown DLR station is the closest station, approximately 600m walk from the site entrance.

Previous consented arrangements
In 2017 Keltbray Ltd, obtained time limited consent, which expires on 31st July 2019 for the continued use of land and wharf as road-river hub for aggregate, construction, demolition and excavation waste storage and civil engineering applications (Planning Application 17/01822/FUL). This application was supported by a TS prepared by CCE dated April 2017, which discussed the operational requirements, associated trip generations and local highway impacts.

It should also be noted that Many planning approvals in the Royal Docks area are time limited to this date, due to the safeguarding of the Silvertown Tunnel Scheme which in May 2018 the Secretary of State approved the Development Consent Order (DCO). As such Keltbray Ltd are looking to transfer their operations to Plaistow Wharf in response.

In 2008, Brett Aggregates Limited (BAL) secured planning permission (Planning Application 07/01816/FUL) for the redevelopment of Peruvian and Plaistow Wharf combined, for a cementitious storage facility, bagging plant and dry mortar plans on Plaistow Wharf, and aggregate handling activities and a concrete batching plant on Peruvian Wharf.

The site handles materials brought to the site by road and then transfers them to river/water transport. Some of the materials passing through Thames Wharf have been treated/sorted at Mohawk Wharf, located approximately 1 km to the south.

It is understood that all infrastructure requirements for the site operation are in place and that conditions attached to the 2010 consent with respect to highway access and impact mitigation arrangements were fulfilled, so there are no new infrastructure requirements for the Wharf site.

A separate planning application (14/00395/FUL) for a new access road...
linking Peruvian Wharf to North Woolwich Road, as detailed on Waterman Drawing No.0011 Rev A01 and Drawing No.0012 Rev A01 was consented in March 2014. The access road is now constructed.

Current Application
Vehicle movements associated with deliveries at Thames Wharf operate between 07:00-19:00 Monday to Friday and 07:00-13:00 Saturday, submitted application proposes to maintain these operating times when operations transfer to Plaistow Wharf.

The proposed transfer of existing operations from Thames to Plaistow Wharf, will not result in a change in vehicle movements on the wider highway network (A1020) compared with the extant permission of Thames Wharf, but rather it is likely to result in minor changes in vehicle distributions between the A1020 North Woolwich Road, and the immediate highway network of Dock Road and North Woolwich Road. Specifically, due to the fact that Plaistow Wharf, is located strategically closer to Mohawk Wharf, and with circa 80,000 tonnes per annum (tpa) of waste material being imported from Mohawk Wharf to Plaistow Wharf this will reduce vehicle movements in the proximity of Dock Road (previously associated with the vehicle movements from Mohawk Wharf to Thames Wharf).

Keltbray Ltd obtained consent (Planning Application 17/01822/FUL) to continue operations for the importation of between 150,000 to 200,000tpa of waste per annum by road for export by boat, with the material shipped for final end of waste use destinations or for further sorting, recycling and recovery, up to 31st July 2019.

Presently the operations at Thames Wharf are subject to conditions and permits set by the Environment Agency (EA). The EA permit needed for the transfer of waste at Thames Wharf, caps the annual tonnage at 150,000tpa. Keltbray Ltd propose to transfer this current level of output (150,000tpa) to Plaistow Wharf and as with their extant permission at Thames Wharf, Keltbray Ltd would like the flexibility for growth in this volume to 200,000tpa.

Trip Generation
Relating the above figures in terms of vehicle movements noting that BAL, will now operate entirely from Peruvian Wharf, allowing Keltbray to utilise Plaistow Wharf for their operations, alongside Tate and Lyle who will use a proportion of the site for storage. The transfer of waste importation operations from Thames Wharf to Plaistow Wharf are existing / consented, they are also separate to the 300 daily HGV movement cap attributed to BAL within Planning Condition 36 (Planning Application 07/01816). The cap was set to safeguard traffic conditions in the local area and to minimise the environmental impact of traffic generated by the BAL development operations. Keltbray Ltd operations are existing and the transfer to Plaistow Relocation of Thames Wharf will not result in a material change in environmental or local traffic conditions and are wholly separate to BAL operations and Planning Condition 36.
Master Planning
Transportation earlier this year questioned the wider planning consideration especially from the point of view of road hierarchy and road networks providing accessibility to Plaistow wharf including development of adjoining sites S07 and S08.

Keltbray submitted MasterPlanning Statement – Addendum in respect of this concern and acknowledged that The proposed development at Plaistow Wharf will accommodate the transfer of an existing operation within the borough to the site identified in the Local Plan for its managed SIL release and in particular; in the event that the access road alignment is altered, as a consequence of development proposals for S07, Keltbray will cooperate with the parties in using the realigned access road.

Conclusion
Transportation are satisfied that transferring operations to Plaistow Wharf will not result in a material impact on the wider network, may potentially result in some highway benefits on Dock Road, due to Plaistow Wharf being located closer to Mohawk Wharf, where waste material is cleaned, prior to being exported.

Furthermore, A review of the existing traffic generation transferring from Thames Wharf demonstrates that Keltbray Ltd operations account for a very small proportion of the total traffic generation on the A1020 Silvertown Way.

The Masterplanning Statement – Addendum assures that the re-alignment of road work to accommodate desired proposals for Strategic Site S07 will be welcomed.

Subject to the above Transportation do not object to submitted proposals."

Officer comments on consultation response:
The letter of support is noted – see below for additional comments following discussions with LBN Transport and the case officer.

<table>
<thead>
<tr>
<th>Consultee:</th>
<th>LBN Transport – Representation 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date received:</td>
<td>16 August 2019</td>
</tr>
</tbody>
</table>

Summary of consultation response:

Transport responded with recommended conditions as follows:

“Conditions:

Car Parking Layout - Condition: No development shall take place until details of the layout and number of car parking spaces have been submitted to and approved in writing by the Local Planning Authority. The development shall not be occupied until <number> car parking spaces have been installed in accordance with the approved details. Such spaces shall be
<table>
<thead>
<tr>
<th>Condition</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blue Badge - Condition</td>
<td>The car parking accommodation of the approved development shall include XXX suitable for use by a person with disabilities (in accordance with the specifications within BS8300: Design of buildings and their approaches to meet the needs of disabled people: Code of Practice)</td>
</tr>
<tr>
<td>Reason</td>
<td>To ensure adequate access for all users of the building, in particular Blue Badge holders.</td>
</tr>
<tr>
<td>CLP - Construction Management Plan</td>
<td>No works shall commence unless and until a Demolition and Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. The Demolition and Construction Management Plan shall include:</td>
</tr>
<tr>
<td>-</td>
<td>a survey of the existing conditions of adjacent public highways;</td>
</tr>
<tr>
<td>-</td>
<td>an assessment of the cumulative impacts of demolition and construction traffic;</td>
</tr>
<tr>
<td>-</td>
<td>details of the likely volume of demolition and construction trips and any mitigation measures;</td>
</tr>
<tr>
<td>-</td>
<td>site access and exit arrangements including wheel washing facilities and swept paths where required;</td>
</tr>
<tr>
<td>-</td>
<td>vehicular routes, booking systems and an assessment for the scope of consolidating loads to reduce generated road trips;</td>
</tr>
<tr>
<td>-</td>
<td>proposed temporary access and parking suspensions and any temporary access and parking solutions required;</td>
</tr>
<tr>
<td>-</td>
<td>Site compound arrangements including arrival of vehicles, parking, loading, storage and waste arrangements;</td>
</tr>
<tr>
<td>-</td>
<td>methods for of protection of adjacent highway infrastructure; and,</td>
</tr>
<tr>
<td>-</td>
<td>an assessment of all matters as are likely to cause nuisance to adjoining occupiers (including but not limited to; noise, dust, smoke, road cleaning, odour control) accompanied by mitigation measures</td>
</tr>
</tbody>
</table>

Reason: To promote sustainable modes of transport.
addressing all matters relevant to this particular site. Works shall be carried out in accordance with the approved Demolition and Construction Management Plan. Reason: To ensure that works do not prejudice the ability of neighbouring occupier’s reasonable enjoyment of their properties and to ensure that works shall not represent any unacceptable level of vehicle movements such that the safety of pedestrians or other road users shall be unduly prejudiced. The imposition of this prior to commencement planning condition is considered necessary to prevent commencement of works until the requirements have been met because the timing of compliance is fundamental to decision to grant planning permission.

Travel Plan - Condition: Prior to the use hereby approved, a Travel Plan shall be submitted to, and be approved in writing by, the Local Planning Authority. The travel plan shall include the appointment of a Travel Plan coordinator with responsibility for implementing the Travel Plan, shall set targets on the use of sustainable travel and reducing the reliance on private cars, provide appropriate management Strategy and measures to support these targets, and shall include monitoring and review arrangements. The approved Travel Plan shall then be adhered to at all times to the satisfaction of the LPA, and results of monitoring and review reported to the LPA in accordance with the agreed travel plan. The approved Travel Plan shall then be adhered to at all times to the satisfaction of the Local Planning Authority.

Reason: To promote sustainable modes of transport.

Section 106 Hots
- Travel Plan Monitoring and support - £10K;
- Contribution towards improvements to Pedestrian and cycle environment including new connections - £15K;"

Officer comments on consultation response:
Officers do not consider that the recommended conditions would be reasonable in this instance due to the type of use proposed in particular, the construction stage is likely to be short and no more of an impact than the operation. Furthermore the parking layout is provided within the application. The S106 head of terms are not considered to be reasonable as the site does not directly impact the public highway, it will use a private access road.
5.0  PLANNING POLICIES AND GUIDANCE

5.1 The Local Development Plan comprises:

- the London Plan (the spatial development strategy for London consolidated with alterations since 2011 and published March 2016) referred to hereafter as the London Plan;

- The Draft London Plan: The Spatial Development Strategy for Greater London (Consolidated changes version July 2019 incorporating Minor Suggested Changes – published in August 2018 and inclusive of Further Suggested Changes and Post Session Changes) is under Examination – referred to hereafter as the Draft London Plan;

- the London Borough of Newham Local Plan (2018) – referred to hereafter as the LP;

- the London Borough of Newham Local Plan: Policies Map 2018; and

- the Joint Waste Development Plan for the East London Waste Authority Boroughs (adopted 27th February 2012)

5.2 Material weight has been given to the National Planning Policy Framework (MHCLG, February 2019).

5.3 The following policies are relevant to the assessment of this application:


1.1 Delivering the strategic vision and objectives for London

2.17 Strategic industrial locations

3.1 Ensuring equal life chances for all
3.2 Improving health and addressing health inequalities
4.1 Developing London’s economy
4.4 Managing industrial land and premises
4.12 Improving opportunities for all

5.1 Climate change mitigation
5.2 Minimising carbon dioxide emissions
5.3 Sustainable design and construction
5.4A Electricity and gas supply
5.5 Decentralised energy networks
5.6 Decentralised energy in development proposals
5.7 Renewable energy
5.10 Urban greening
5.11 Green roofs and development site environs
5.12 Flood risk management
5.13 Sustainable drainage
5.14 Water quality and wastewater infrastructure
5.15 Water use and supplies
5.16 Waste net self-sufficiency
5.17 Waste capacity
5.19 Hazardous waste
5.20 Aggregates
5.21 Contaminated land

6.1 Strategic approach
6.2 Providing public transport capacity and safeguarding land for transport
6.3 Assessing effects of development on transport capacity
6.5 Funding Crossrail and other strategically important transport infrastructure
6.9 Cycling
6.10 Walking
6.12 Road network capacity
6.13 Parking
6.14 Freight

7.1 Lifetime neighbourhoods
7.2 An inclusive environment
7.3 Designing out crime
7.4 Local character
7.5 Public realm
7.6 Architecture
7.13 Safety, security and resilience to emergency
7.14 Improving air quality
7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes
7.19 Biodiversity and access to nature
7.20 Geological conservation
7.24 Blue ribbon network
7.26 Increasing the use of the blue ribbon network for freight transport
7.28 Restoration of the blue ribbon network
7.29 The river Thames
7.30 London’s canals and other rivers and waterspaces

5.5 The London Plan: The Spatial Development Strategy for Greater London
(Draft for Consultation December 2017 with minor suggested changes July 2018)

GG1 Building strong and inclusive communities
GG2 Making the best use of land
GG3 Creating a healthy city
GG5 Growing a good economy
GG6 Increasing efficiency and resilience

SD1 Opportunity Areas
SD10 Strategic and local regeneration

D1 London’s form and characteristics
D2 Delivering good design
D3 Inclusive design
D7 Public realm
D10 Safety, security and resilience to emergency
D11 Fire safety
D12 Agent of change
D13 Noise

E4 Land for industry, logistics and services to support London’s economic function
E5 Strategic Industrial Locations (SIL)
E11 Skills and opportunities for all

G5 Urban greening
G6 Biodiversity and access to nature
G9 Geodiversity

SI1 Improving air quality
SI2 Minimising greenhouse gas emissions
SI3 Energy infrastructure
SI5 Water infrastructure
SI7 Reducing waste and supporting the circular economy
SI8 Waste capacity and net waste self-sufficiency
SI10 Aggregates
SI12 Flood risk management
SI13 Sustainable drainage
SI14 Waterways – strategic role
SI15 Water transport
SI17 Protecting London’s waterways

T1 Strategic approach to transport
T2 Healthy streets
T3 Transport capacity, connectivity and safeguarding
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T6.5 Non-residential disabled persons parking
T7 Freight and servicing
T9 Funding transport infrastructure through planning

5.6 Newham Local Plan (2018)

S1 Spatial Strategy and Strategic Framework
S3 Royal Docks

SP1 Borough-wide Place-making
SP2 Healthy Neighbourhoods
SP3  Quality Urban Design within Places
SP5  Heritage and other Successful Place-making Assets
SP7  Quality Movement Corridors and Linear Gateways
SP8  Ensuring Neighbourly Development
J1   Business and Jobs Growth
J3   Skills and Access to Employment
SC1  Environmental Resilience
SC2  Energy & Zero Carbon
SC3  Flood Risk & Drainage
SC4  Biodiversity
SC5  Air Quality
INF1 Strategic Transport
INF2 Sustainable Transport
INF3 Waste and Recycling
INF4 Utilities Infrastructure
INF6 Green Infrastructure & the Blue Ribbon Network
INF7 Open Space and Outdoor Recreation
INF9 Infrastructure Delivery

5.7 London Plan and Local Plan Review

5.7.1 The Mayor of London’s Draft London Plan: The Spatial Development Strategy for Greater London (Consolidated changes version July 2019 incorporating Minor Suggested Changes – published in August 2018 and inclusive of Further Suggested Changes and Post Session Changes) is under Examination. Having regard to NPPF paragraph 48 the emerging document is a material consideration and appropriate weight will be given to its policies and suggested changes in decision-making, unless other material considerations indicate that it would not be reasonable to do so.
6.0 THE COMMUNITY INFRASTRUCTURE LEVY (CIL) REGULATIONS 2010 (AS AMENDED)

6.1 From 1st of April 2019 Mayoral CIL2 (Permissions granted on or after 1 April 2019).

6.2 The Mayor has adopted a new Charging Schedule MCIL2, which came into effect 1st of April 2019. Like MCIL1, MCIL2 will be charged on all development except for education and health.

6.3 The Mayoral rate for Newham has increased within Band 3 to £25 per sqm from £20 per sqm.

6.4 The Mayoral CIL Charging Schedule (MCIL1) (adopted 2012) and the Section 106 Crossrail Funding from Planning Obligations Supplementary Planning Guidance (adopted 2016) is superseded by the revised MCIL Charging Schedule.

6.5 The Newham Community Infrastructure Levy is chargeable in line with the Newham CIL Charging Schedule, which came into effect on 1st January 2014.

6.6 The Newham Community Infrastructure Levy was adopted by full Council on 30th September 2013, which came into effect on 1st January 2014. The Newham CIL Charging Schedule per gross internal sq. m is as follows:

<table>
<thead>
<tr>
<th>Use Class</th>
<th>Charging Zone1 – Post codes E15 (exclusive of the LLDC area), E16 and E3 (part)</th>
<th>Charging Zone 2 – Post codes E6, E7, E12, E13 and IG11 (part)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential</td>
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<td>£40</td>
</tr>
<tr>
<td>Retail</td>
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<td>£30</td>
</tr>
<tr>
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</tr>
<tr>
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<td>£120</td>
<td>£120</td>
</tr>
<tr>
<td>Industrial</td>
<td>£0</td>
<td>£0</td>
</tr>
<tr>
<td>Student Accommodation</td>
<td>£130</td>
<td>£130</td>
</tr>
</tbody>
</table>

6.7 Under Regulation 123 of the Community Infrastructure Levy Regulations 2010 (as amended), the London Borough of Newham has published a list of infrastructure projects or types of infrastructure that it intends to be funded in whole or in part by the Newham CIL. This allows the continued use of planning obligations (S.106 agreements) for other projects or types of infrastructure. Individual developments will not be charged for the same items through S106 and CIL. The Newham Regulation 123 list can be viewed on the Council’s website.
7.0 ASSESSMENT

7.1 The key issues relevant to this application are:

- Principle of Development (7.2);
- Impact upon amenity (7.3);
- Design (7.4);
- Transport and Travel (7.5);
- Access (7.6);
- Energy / Sustainability (7.7);
- Flood Risk Management (7.8);
- Reasons for Approval (7.9)

7.2 Principle of Development

7.2.1 Paragraph 82 of the NPPF indicates that planning policies and decisions should ‘recognise and address the specific locational requirements of different sectors’.

7.2.2 In relation to the principle of development London Plan (March 2016) Policy 2.17 (Strategic Industrial Locations) is relevant as it seeks to protect Strategic Industrial Locations (SIL), it describes them ‘as London’s main reservoirs of industrial and related capacity’. Specifically the site is a Preferred Industrial Location (PIL), such sites are regarded as the most suitable for ‘general industrial, light industrial, storage and distribution, waste management, recycling, some transport related functions, utilities, wholesale markets and other industrial related activities’. Furthermore, Policy 7.26 (Increasing the use of the Blue Ribbon Network for Freight Transport) seeks to ‘protect existing facilities for waterborne freight traffic, in particular safeguarded wharves should only be used for waterborne freight handling use’ and this is especially the case on wharves that are not currently handling freight by water.

7.2.3 For the avoidance of doubt, the London Plan refers to the London Freight Plan (2007), prepared by Transport for London which gives a definition of freight as ‘the physical carriage of goods by any mode. This includes the provision of services and utilities and the movement of waste’.

7.2.4 The Draft London Plan Policy E5 (Strategic Industrial Locations) supports the proactive management of SIL’s.

7.2.5 The site is located in the south of Strategic Site S07 – Central Thameside West as allocated by Policy S3 (Royal Docks) of the LP and detailed within Appendix 1 of the LP - Strategic Site Allocations and also the London Borough of Newham Local Plan: Policies Map 2018. The aspirations of the strategic site allocation are as follows:

7.2.6 ‘Employment and wharf development comprising the reactivated Peruvian Wharf and consolidation of other Thameside West Wharves on this and land to the east at Royal Primrose Wharf. Employment development will be
consistent with the Strategic Industrial Location (SIL) designation, maximising opportunities for modern industrial uses and support the wharf use including providing access, together with improved access to adjoining SIL uses from North Woolwich Road, preferably in the form of a central spine road with connections east, west and to the wharves.’

7.2.7 The site is located in Plaistow Wharf, which is part of a larger Safeguarded Wharf referred to as Peruvian Wharf. As per the London Plan Glossary definition Safeguarded Wharves are sites that have been safeguarded for cargo handling uses such as intraport or transhipment movements and freight-related purposes. Furthermore the site is classified as a Strategic Industrial Location (SIL) as per the London Borough of Newham Local Plan (2008) (LP) and the London Borough of Newham Local Plan: Policies Map 2018.

7.2.8 LP Policy S3 2(e) identifies Peruvian Wharf as one of four safeguarded wharves in the Royal Docks to be consolidated. Policy S3 2(e) states:

‘Consolidation of four safeguarded wharves in the Royal Docks (Thames, Peruvian Manhattan, and Sunshine) at Central Thameside West on Peruvian and Royal Primrose Wharves will achieve no net loss of functionality or wharf capacity with additional development conforming with the associated SIL designation and complementing the wharves, including through maintaining access to them.’

7.2.9 The proposal would be classed as a Sui Generis use. However, this is regarded to be complementary with SIL aspirations which support waste management industries, surrounding industrial uses, and the extant planning permission (ref. 07/01816/LTGDC) for an aggregates facility under Use Class B2 (General Industry) (see below for full description).

7.2.10 In principle the proposed use in this location is considered to be compatible with aspirations for SIL and Safeguarded Wharves. The existing CDE waste operations are located approximately 800 metres to the north-west at Thames Wharf and are due to relocate to Peruvian Wharf, consolidating the use while also ensuring no loss of functionality.

7.2.11 Planning permission (ref. 07/01816/LTGDC) was granted in 2008 by the London Thames Gateway Development Corporation for and for an aggregate facility. The planning permission is for:

‘Tranship and distribute aggregates using sea-going vessels, utilising rear of the wharf for aggregate storage, loading and onward distribution and for cementitious powders import, storage and export. Construction and operation of a ready-mixed concrete batching plant and a dry silo mortar plant using aggregates and cementitious powders landed and handled. The bagging of aggregates.’

7.2.12 The above permission covered the application site and an adjoining site to the west, now known as the Brett Aggregates site. It is noted that the application site is the result of the site for the 07/01816/LTGDC permission being split in
two, one eastern portion being the application site which relates to this application and the western portion being the Brett Aggregates site. Brett Aggregates have implemented their permission on one half of the site as set out above and it is in the final stages of completion. The application site has remained vacant, hence the reason for this application.

7.2.13 In summary there is a historic acceptance of industrial uses in this location, supported by planning permission 07/01816/LTGDC which relates to this site.

7.2.14 It is also acknowledged that this facility is being re-located from another nearby location in the Royal Docks Area.

7.2.15 Overall in principle of the development is considered to be acceptable due to the compatibility of the uses with the Strategic Site Allocation, its designation as SIL and its designation as a Safeguarded Wharf. The proposed CDE waste storage and transfer facility is compatible with the relevant allocations, designations and Policy aspirations.

7.3 Employment

7.3.1 LP Policy S1 gives support to the carefully Managed Release of employment land in combination with co-location, intensification and sensitive infill. In addition LP Policy J2 indicates that Thames Wharf will be released from its SIL designation, subject to managed release criteria. Part of this criteria is to ensure that a relocation strategy is in place for existing businesses.

7.3.2 LP Policy J3 requires all major development to help ensure that Newham residents have access to work and share in the increasing wealth associated with the expanding local and London-wide economy. To this end, the proposal is expected to demonstrate a commitment to improvements to education, skills and training provision and removal of barriers to work for Newham residents. It is also expected that local labour is promoted, both through the construction and operational phase of the development.

7.3.3 The requirements of Policy J3 are that all major developments should help to ensure that more Newham residents access work through seeking to secure that they occupy 35% of all construction phase jobs and 50% of all post construction (end user) phase jobs. All major developments must also demonstrate an understanding of and commitment to the desirability of supplying the construction and operational needs from within Newham.

7.3.4 Keltbray will effectively transfer its business operations from Thames Wharf to Plaistow Wharf. In addition the proposal would generate a small uplift in the number of operational phase jobs from 11 employees at Thames Wharf to 15 employees at Plaistow Wharf, as proposed.

7.3.5 LP Policy J3 requires that local labour is promoted through the construction phase of the development. However, in this particular case the level of construction work and the number of construction jobs that would be created
is minimal and it is not considered to be reasonable to apply such an obligation.

7.3.6 Overall officers are satisfied that the transfer of the business operation to its proposed location at Plaistow Wharf would protect existing employment.

7.4 Impact upon amenity

7.4.1 The core principles within the NPPF seek that new development contribute to conserving and enhancing the natural environment and reducing pollution. It is noted that planning plays a key role in seeking the reduction in greenhouse gasses and encourages development in locations which has reduced carbon emissions. Paragraph 170 reinforces the need for new and existing development to, wherever possible, help improve local environment conditions like such as air and water quality.

7.4.2 Policy 7.6 of the London Plan outlines that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. London Plan Policy 7.14 (Improving Air Quality) states that development proposals should be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)). London Plan Policy 7.15 (‘Reducing and Managing Noise’…) requires new development to manage noise by avoiding significant adverse noise impacts on the health and quality of life as a result of new development.

7.4.3 The Draft London Plan broadly reflects the extant London Plan policies within policies SI1 (Improving Air Quality) and SI2 (Minimising greenhouse gas emissions). In regards to air quality Policy SI1 states that development proposals should not lead to further deterioration, exceed limits, reverse the benefits of improvement activities or create unacceptably high levels of exposure to poor air quality. In addition Draft London Plan Policy D12 (Agent of Change) strengthens the approach to the ‘agent of change’ principal and seeks to ‘take account of existing noise and other nuisance including dust, odour, light and vibrations’ generating uses in a sensitive manner when new development is proposed nearby’. In regards to noise Policy D13 (Noise) supports Policy D12 and requires that new development avoids ‘significant adverse noise impacts on health and quality of life’ and requires the mitigation and minimisation of existing and potential adverse impacts.

7.4.4 Local Plan policies SP1 (Borough-wide Place-making), SP2 (Healthy Neighbourhoods), SP3 (Quality Urban Design within Places) and SP8 (Ensuring Neighbourly Development) seek to deliver high quality development which respects, takes advantage of and enhances the positive elements and distinctive features of the borough whilst delivering development which creates healthier neighbourhoods and minimises the potential for ‘bad neighbour’ uses. Policy SP2 specifically supports the need to improve Newham’s air quality, reduce exposure to airborne pollutants and seeks to ensure new developments deliver sustainable development. Policy SP8 reinforces the
need to achieve good neighbourliness and considers factors such as environmental impacts and residential amenity. In particular it seeks to avoid unacceptable exposure to light, odour, dust, noise, disturbance, vibration, radiation and other amenity or health impacting pollutants.

7.4.5 LP Policy INF3 states that all waste facilities should be fully enclosed or provide an equivalent level of environmental protection with respect to [air] emissions. In addition the supporting statement to INF3 seeks to minimise or mitigate the impacts of waste management, processing and transport on the environment and the borough’s residents and give preference to proposals that promote an efficient use of space, enable and make provision for access by river and rail freight, and avoid harmful impacts on amenity and air quality.

7.4.6 Furthermore, LP Policy SC5 of the Local Plan states that all development should be at least air quality neutral as a minimum, supporting a net decrease in specified pollutants and making design, access, energy, and management decisions that minimise air pollution generation and exposure at demolition, construction, and operation stage.

Air Quality and Dust Amelioration:

7.4.7 The proposal is accompanied by a Air Quality Assessment (AQA) together with addendums, prepared by SLR. In summary the AQA assesses:

- impacts associated with the construction phase in relation dust and particulates graded as PM$_{10}$;
- potential impacts from vehicle emissions;
- potential impacts associated with dust emissions possible during the handling and storage of inert wastes;
- mitigation measures.

7.4.8 The findings of the AQA indicate that in the absence of mitigation the dust impacts during the construction phase are assessed as being low risk.

7.4.9 The AQA has been reviewed by LBN Environmental Health (EH). There was initial concern about the impact of dust on future occupiers of nearby sites (including strategic sites) that might come forward for residential development in the future. As a result of EH’s concerns the applicant has scoped in the potential for residential within the vicinity of the site. EH considers that the proposal is acceptable, in particular it is noted the following application documents will respond to the following matters:

- Asbestos: provision of an Asbestos Monitoring Plan
- Mitigation to reduce the impacts of dust have been set out within the accompanying Site Working Plan:
  - Wheel washing facilities;
  - Consolidated surfacing where vehicle movements will occur;
  - Road sweeping; and,
Non Road Mobile Machinery to adhere to EU Air Quality requirements as per Stage IIIA of EU Directive 97/68/E and be NRMM registered.

7.4.10 Officers are conscious that aside from planning control and environmental health control the AQA states that:

‘The operation requires an Environmental Permit under the Environmental Permitting (England and Wales Regulations 2016 (as amended) and as such is regulated by the Environment Agency. The Permit and associated documentation stipulate operational measures and controls to ensure that fugitive dust emissions are minimised. Keltbray are in the process of applying for the Environmental Permit for the Plaistow Wharf site’.

7.4.11 The EA is responsible for granting the applicant an environmental permit. This would require the operator to work with the EA to maintain a dust management plan as part of their environmental management system.

7.4.12 Officers are in a position to support the application in regards to the Site Working Plan, AQA and Asbestos Monitoring Plan. It is therefore considered that the proposal would not have an undue harmful impact in terms of its impact on air quality and dust.

Noise:

7.4.13 As identified earlier in this report the proposal site is located in a SIL and it carries a Safeguarded Wharf designation. It is noted that the adjacent the nearest neighbouring uses are industrial in nature and where vacant the majority of uses appear to be allocated for industrial/commercial uses. The nearest residential premises have been identified approximately 300 metres to the north-east and approximately 450 m to the south-west, within the London Borough of Greenwich.

7.4.14 The proposal is accompanied by a Noise Impact Assessment, prepared by W. A. Hines & Partners. In summary the findings of the report indicate that the proposed operations would not influence the prevailing environments at the nearest properties and it is expected that the operations would be within acceptable noise limits.

7.4.15 The Noise Assessment has been reviewed by EH and it is noted that masterplanning should cover a broader scope, in particular future residential development in the Strategic Site and adjoining strategic sites. EH therefore require a further noise assessment to be undertaken to be secured by condition, if the application is approved.

7.4.16 Furthermore, as per the consultation response from EH, the following mitigation to reduce the impacts of dust and noise would be secured by condition if the application is approved:

- Hours of Operation to be restricted
7.4.17 Restrictions to the hours of operation have been carefully considered in light of the existing site designations and the nearest existing and future residential uses and it is proposed to restrict works to 0700 and 1800 on Mondays to Fridays and between 0800 and 1800 on Saturdays, with no works on Sundays. While EH recommended a start time of 08:00 officers were of the view that in this location a start time of 0700 Monday to Friday would be reasonable. Officers are also mindful that the operation of the wharf is restricted by the tidal Thames and high site changes throughout the year. It is therefore the case that the proposed use would need to have the ability to dock, load out and load at high tide. This is reflected in the recommended conditions at Appendix 1. If the proposal is minded for approval the appropriate condition has been recommended at Appendix 1.

7.4.18 The application would be located at least 300 metres from future residential develop to the north of the site, in addition the application sits behind other 24 hour industrial uses. In terms of noise pollution, it is considered the proposal would be an appropriately located industrial use in terms of its compatibility with adjoining uses and its location of the River Thames. The findings of the submitted Noise Assessment indicate that there would not be an undue harmful impact upon the amenity of adjoining residents. Therefore, the proposal would be acceptable in terms of its impact on noise.

7.4.19 Overall the impact of the development on air quality and noise and disturbance is not considered to have an undue harmful impact. Officers have assessed that the application is unlikely to harm residential amenity in terms of daylight/sunlight, privacy and outlook due to the proximity of the site to the nearest residential premises.

7.5 Design

7.5.1 The NPPF at paragraph 127 seeks to ensure developments will function well and add to the overall quality of the area, and are visually attractive as a result of, amongst other considerations, effective landscaping.

7.5.2 Policy 7.2 of the London Plan requires all new development to achieve the highest standards of accessible and inclusive design and will support the principles of inclusive design which seek to ensure that developments can be used by all, regardless of disability, age, gender, ethnicity or economic circumstances. Policy 7.6 seeks to ensure that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context. It also advises that buildings and structures should be of the highest architectural quality and comprise details and materials that complement, not necessarily replicate, the local architectural character.

7.5.3 The broad objectives of the London Plan’s design polices are reflected in policies D1, D2 and D3 of the Draft London Plan.
7.5.4 Through Local Plan Policy SP1 it is expected that developments high quality development, which respects, takes advantage of, and enhances the positive elements and distinctive features of the Borough, contributing to a well-connected and integrated series of successful and distinctive places, that together help to transform the borough and its attractiveness as somewhere to live, work and stay. Policy SP3 emphasises the need for development to ensure high quality urban design in new buildings and spaces, contributing to safe, sociable and inclusive mixed and balanced communities. Through Policy SP7 North Woolwich Road is allocated as a key movement corridor and linear gateway, and it seeks strategically to ensure development reinforces their role through improvements via quality urban development and architectural design and public realm interventions. Proposals will be supported that introduce active frontages to their edges, adhere to the general principles of good urban design as noted within the above polices, SP1, SP3 and SP5, enclose the street and reduce noise and air pollution without creating a tunnel effect, significantly raise and easily maintain the quality of the public realm and facilitate the smooth and efficient but safe movement of traffic in the context of an overall shift to sustainable transport in line with INF2.

7.5.5 The application site is located to the south of Tate and Lyle’s Golden Syrup factory and the proposed Gazely Development site (currently under consideration by the LPA) to the north. The site is therefore setback at least 200 metres from North Woolwich Road. The South of the site is bound by the River Thames and it is noted that the wharf edge is approximately 3.5 metres higher than the remainder of the site. It is therefore considered that the site is generally obscured when viewed from public areas outside of the site.

7.5.6 LBN Urban Design & Conservation has reviewed the submitted details and consider that there is a general absence of detail for fences, road surfaces and other hard standing areas. It is also suggested that a site-wide landscaping plan should be provided. Furthermore, the modular office building is regarded as being functional in appearance and due to its context this is not considered present a significant issue. It is suggested that the appearance of the building could be improved to relate to other buildings in the vicinity of the site.

7.5.7 In considering this scheme officers are cognisant that the site does not have any clear street frontages. Due to the type of heavy industry proposed it is not considered that members of the public would be compelled to enter the site access road. However, as set out in the Transport section of this report consideration has been given to public realm.

7.5.8 The proposed office accommodation would be housed within a two storey Portakabin measuring 12.3m (width), 20m length, 6.5m (height). Another welfare facility for staff will be located on the site and will measure 3.4m (width) by 9.6m (length) and 2.6m (height). A wheel washing facility, weighbridge and storage bay enclosures will also be located on site.

7.5.9 Due to its location the site is considered to be generally obscured by surrounding sites and developments. Overall, it is not considered that the
proposal would have an undue harmful impact on the character of appearance of the area.

7.6 Transport and Travel

7.6.1 The NPPF recognises that sustainable transport has an important role to play in facilitating sustainable development but also contributing to wider health objectives. In particular it offers encouragement to developments which support reductions in greenhouse gas emissions and those which reduce congestion. The NPPF also outlines that developments which generate significant vehicle movements should be located where the need to travel will be minimised and the use of sustainable transport options can be maximised. It is also expected that new development will not give rise to the creation conflicts between vehicular traffic and pedestrians.

7.6.2 Policy 6.1 of the London Plan seeks to promote sustainable modes of transport and accessibility, and reduce the need to travel by car. Policy 6.3 states that development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.

7.6.3 Draft London Plan Policy SI16 part (h) requires that development proposals should improve and expand the Thames Path and the towpaths and provide better linkages to the transport network. Collaboration is therefore required with a range of relevant partners including local authorities, landowners, the EA, PLA and Natural England. This Policy is explicitly states that these paths will be public and not private spaces. Policy T3 gives further support to safeguarding the Walk London Network, protecting access to and improving the Thames Path and, where relevant, improving its alignment with the Thames.

7.6.4 Policy INF2 of the Newham Local Plan aims to secure a more sustainable pattern of movement in Newham, maximising the efficiency and accessibility of the Borough’s transport network on foot, cycle and public transport in order to reduce congestion, enable development, improve the health, fitness and well-being of residents and make necessary car journeys easier. INF2 also seeks to enable development through riverside pathways. Furthermore, the accompanying text to Policy S3 acknowledges that in the Royal Docks at a local level, finer grain connections for walking and cycling are still poor for local residents both within the Docks and from the surrounding area, and need to be improved, addressing key dock and rail corridor barriers, as well as the quality and comfort of the pedestrian and cycling experience, riverside and dockside access.

7.6.5 In terms of the levels of parking the application includes the following provision:

- A total of 6 cycle spaces are proposed. This is based on the London plan minimum requirement for B1 offices taking into account the office and
welfare facility floor area of 450m². The London Plan policy requirement (Table 6.3) is for 1 space per 90 m² for inner and central London. Therefore a minimum of 5 spaces would be required. In this case the Applicant has provided 6 spaces.

- A total of 10 parking would be provided on site, of this 3 spaces would be for blue badge parking and 2 spaces would be for electric vehicle charging points which equates to 20% provision. Passive provision is not discussed within the submission, however, this can be secured by way of condition as set out at Appendix 1. It is noted that based on the entire site area that up to 19 car parking spaces could be provided in line with the London Plan requirements.

7.6.6 The application seeks to increase the level of CDE waste it handles from 150,000 tonnes (at its Thames Wharf facility) to 200,000 tonnes (at Plaistow Wharf) per annum. However, it is noted that the increase in capacity is subject to obtaining a permit from the Environment Agency.

7.6.7 In assessing this application Officers acknowledge that the existing Keltbray operations will be re-locating from its nearby Thames Wharf site. LBN Transport has advised that the re-location to Plaistow Wharf will not result in a change in vehicle movements on the wider highway network, in particular the A1020. In fact it is assessed that the site will be closer to Mohawk Wharf which sends 80,000 tonnes of waste per annum to the existing site. Therefore it is assessed that the Plaistow Wharf site will reduce vehicle movements in the vicinity of Dock Road.

7.6.8 At present the barges that serve the Thames Wharf site can be loaded with 1,000 tonnes of material per movement. The Plaistow Wharf site can accommodate larger barges with a capacity for 2,000 tonnes of material per movement.

7.6.9 In relation to vehicular movements officer’s note the following details in relation to Keltbray’s Thames Wharf Permission, its proposed Plaistow Wharf operations and the existing Brett Aggregates permission:

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<thead>
<tr>
<th>Scheme</th>
<th>Currently permitted</th>
<th>Proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brett Aggregates Permission</td>
<td>300 per day (150 in 150 out).</td>
<td>300 per day (150 in 150 out).</td>
</tr>
<tr>
<td>Thames Wharf Vehicular Movements</td>
<td>182 (two way daily HGV movements) / Approx 50,000 (two way HGV movements per annum)</td>
<td>N/A</td>
</tr>
<tr>
<td>Keltbray’s Proposal for Plaistow Wharf</td>
<td>N/A</td>
<td>81 (two way daily HGV movements) /11,111 (two way HGV movements per annum)</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td>482 two way movements per day</td>
<td>381 two way movements per day</td>
</tr>
</tbody>
</table>

7.6.10 The accompanying Planning Statement and Transport Statement indicate that the proposal would result in 11,111 two way HGV movements per annum. As the aggregates component of the Keltbray’s operations at Thames Wharf is
not proposed at Plaistow Wharf there would be a reduction of HGV movements from 182 to 81 per day. Therefore as a result of this permission there would be fewer vehicular movements in the locality.

7.6.11 A planning application is currently under consideration (ref.19/01776/FUL) on land to the north of Plaistow Wharf for a storage and distribution warehouse known as G-Park. This application proposes changes to the current access road to Plaistow Wharf with a new road to the west. The accompanying Masterplanning Statement acknowledges the G-Park proposal and indicates a willingness to cooperate.

7.6.12 LBN Transport conclude that the proposal would not negatively impact the wider road network. In addition the positive messages in the Masterplanning Statement to work with G-Park in regards to re-aligning the access road are noted. Therefore, LBN Transport have no objections to the proposal.

7.6.13 LBN Transport has recommended conditions as set out in Appendix 1 to be applied if the application is minded for approval. These conditions relate to car parking layout, blue badge parking, cycle parking, construction management plan (CMP) and a travel plan. Officer’s note that the parking layout has been provided together with blue badge parking and cycle parking. Furthermore a Travel Plan has been included with the application. Construction of the development is not considered to take place over a long period of time and considering the resulting proposed use it is not considered reasonable to enforce a CLP in this instance.

7.6.14 Furthermore, the GLA has provided a consultation response in regards to transport as part of its Stage 1 Review.

7.6.15 In summary the following key points were raised by the GLA:

- Support for the use of the River Thames for the bulk transportation of waste;
- A Road Safety Assessment has been recommended;
- Travel Plan to be provide secured, monitored, reviewed, and enforced;
- The draft London Plan has aspirations for car free development, other than blue badge parking. An explanation of the car parking levels is required.

7.6.16 In response to the GLA’s comments the Applicant submitted a Road Safety Assessment (RSA). LBN Transport reviewed the (RSA) and it is included within the approved documents. A Travel Plan has been provided with the application, due to the low employment yield on the site it is not considered reasonable to monitor, review and enforce the travel plan. Officers consider the proposed levels of parking to be acceptable and they are considered to accord with the adopted London Plan policy requirements. Due to the low PTAL ratings and the requirement for 24 hour wharf access officers are not concern by this relatively low level of parking. The necessary blue badge parking spaces are identified within the planning application documents and
drawings. Electric vehicle charging points have not been secured by condition due to the low levels of parking proposed.

Riverside walkway

7.6.17 Officers are aware that the Brett planning permission (ref. 07/01816/LTGDC, dated 3 December 2008) approved by the London Thames Gateway Development Corporation (LTGDC) is accompanied by a Section 106 Agreement.

7.6.18 The Silvertown area has seen a number of large scale residential-led developments come forward in the past decade and it is envisaged that in the future it may be necessary to link the site to a riverside walk in the interest of public health and sustainable transport connectivity. Therefore, officers take the view that it is necessary to safeguard the riverside walk. As shown on the accompanying Proposed Site Layout Plan Keltbray commit to including the existing legal obligation for a riverside walk as per the aforementioned Brett Planning Permission. This will be secured as a Head of Term within a s106 legal agreement.

7.6.19 With respect to transport and travel it is not considered that the proposal would have an adverse negative impact on the highway network or highway safety and it is considered to promote more sustainable transport options. Support for this application is on the provision that the recommended transport conditions at Appendix 1 are applied if the application is minded for approval.

7.7 Flood Risk & Sustainable drainage;

7.7.1 The NPPF states that inappropriate development in areas of flooding should be avoided by directing development away from areas at highest risk of flooding, but where development is necessary, making it safe without increasing flood risk elsewhere. Objective 103 continues by stating that when determining planning applications, local planning authorities should only consider development appropriate in areas at risk of flooding where, informed by a site-specific flood risk assessment following the Sequential Test, and if required the Exception Test, it can be demonstrated that within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location; and development is appropriately flood resilient and resistant, including safe access and escape routes where required, and that any residual risk can be safely managed, including by emergency planning; and it gives priority to the use of sustainable drainage systems.

7.7.2 Policy 5.12 of the London Plan states that development proposals must comply with flood risk assessment and management requirements set out in national policy. The development must also have regard to measures proposed in Thames Estuary 2100 and Catchment Flood Management Plans. Developments which are required to pass exception testing will need to address flood resilient design and emergency planning. Policy 5.13 seeks that
development utilise Sustainable Urban Drainage. The above polices are reinforced in the Draft London Plan at Chapter 9.

7.7.3 Policy SC3 of the Local Plan states the Strategic Flood Risk Assessment will inform spatial planning and development management decisions and flood risk will be reduced by a number of measures (listed within the policy document). The objective being that development must be shown to be flood resistant and regeneration should improve the resilience of those parts of the borough at risk of flooding. It additionally states that developments should aim to reduce surface run-off to greenfield rates through the maximisation of the use of SuDS (Sustainable urban Drainage Systems), to provide sustainable design for new major developments and those within a Critical Drainage Area (CDA).

7.7.4 Officers note that the proposal is located within Flood Zone 3 (Defended by flood defences).

7.7.5 The Lead Local Flood Authority was consulted in regards to the proposal and following extensive negotiation with the applicant has removed its initial objection. However, this is subject to attaching a condition to any permission requiring the detail of a surface water drainage strategy to be approved. Officers are of the view that the applicant has taken the appropriate steps to ensure that a SUD’s scheme will be in place within the development. In this regard it is considered that the proposed scheme will be acceptable in regards to SUD’s.

7.7.6 The GLA’s initial consultation response highlighted that the proposal does not provide for future defence maintenance and raising in line with the TE2100 plan over the lifetime of the development. As such it is not considered to comply with the requirements of London Plan Policy 5.12 or Draft London Plan Policy SI.12. Since then the applicant and the GLA have been in discussions and a ‘FRA Surface Water Addendum’ has been provided. The GLA provided the following response:

- “Flood risk – the PLA as landowner has confirmed that the development is water compatible and they will provide for future defence raising through the development’s lifetime.
- Sustainable drainage – the proposed treatment of water for silt and oil removal prior to direct discharge to the river is considered appropriate given the proposed use of the site.
- Water efficiency – the Applicant has confirmed that there will be no wash down facilities on site and that the only water use will be in the office building, which will be provided with low flow fittings.”

7.7.7 The Environment Agency (EA) has responded to the consultation. While there is no objection in principle the EA does require further information.

7.7.8 In its consultation response the EA has confirmed that:
“before planning permission is granted, to determine if the flood defence in its current condition will be able to withstand both the proposed activities of an active wharf, and future raisings in line with Thames Estuary 2100”.

7.7.9 The applicant has provided further information to the EA and is working positively to address this issue.

7.7.10 As such officers request that expect this matter can be resolved through delegated powers.

7.8 Energy & sustainability

7.8.1 The NPPF strongly emphasises a presumption in favour of sustainable development, stating that there are three dimensions to sustainable development: economic, social and environmental.

7.8.2 Policy 5.2 of the London Plan (Minimising carbon dioxide emissions) states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:

   (ii) Be lean: use less energy
   (iii) Be clean: supply energy efficiently
   (iv) Be green: use renewable energy

7.8.3 Policy 5.2 states that the Mayor will work with boroughs and developers to ensure that major developments meet targets for carbon dioxide emissions reduction in buildings. These targets are expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations 2010 leading to zero carbon non-domestic buildings from 2019.

7.8.4 London Plan Policy 5.3 (Sustainable Design and Construction) requires development proposals to demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process. Major development proposals should meet the minimum standards outlined in the Mayor’s supplementary planning guidance and this should be clearly demonstrated within a design and access statement.

7.8.5 Policy 5.7 of the London Plan (Renewable energy) seeks an increase in the proportion of energy generated from renewable sources, and states that major development proposals should provide a reduction in expected carbon dioxide emission through the use of on-site renewable energy generation, where feasible.

7.8.6 Policy 5.9 of the London Plan (Overheating and cooling) requires major development proposals to reduce potential overheating and reliance of air conditioning systems and demonstrate this in accordance with the following cooling hierarchy: 1) minimise internal heat generation through energy efficient design; 2) reduce the amount of heat entering a building in summer through
orientation, shading, albedo, fenestration, insulation and green roofs and walls; 3) manage the heat within the building through exposed internal thermal mass and high ceilings; 4) passive ventilation; 5) mechanical ventilation; and 6) active cooling systems (ensuring they are the lowest carbon options. The policy also requires major development proposals to demonstrate how the design, materials, construction and operation of the development would minimise overheating and also meet its cooling needs.

7.8.7 Consideration is also given to Policy S12 (Minimising Greenhouse Gas Emissions) and Policy S13 (Energy Infrastructure) within the Draft London Plan (December 2017). These policies support that major developments should be net zero-carbon and encourage early engagement with energy companies to establish future energy requirements. Policies SC2 of the Newham Local Plan (Environmental Resilience) sets out mitigation and adaptation measures that development should employ to respond to changing climate. Meanwhile Policy SC2 (Energy and Zero Carbon) echoes the London Plan requiring all development to minimise and reduce carbon emissions by following the lean, clean and green energy hierarchy with all major development to meet the zero carbon target.

7.8.8 The applicant has sought to address the GLA comments at Stage 1 as summarised below:

- An Energy Statement has been prepared for the office building.

7.8.9 The GLA has re-reviewed information on water efficiency and energy. It is of the view that these details are still not satisfactory. In ensuring that the application can meet the necessary policy requirements the application will be referred back to GLA under their Stage 2 assessment. In the event that the details remain to be unsatisfactory conditions could be applied to address these matters post application under an approval of details application.

7.8.10 Officers are of the view that the energy requirements of the portacabin accommodation will be minimal and it is not considered to be reasonable to apply onerous requirements on the developer in this instance.

7.9 Reasons for Approval

7.9.1 The application site is located within a Safeguarded Wharf and within Central Thameside West (Strategic Site S07). The site is also designated as SIL and regarded as a preferred industrial location and therefore the proposed CDE storage and transfer waste operation is considered to be compatible with these allocations and designations. Therefore, the proposal accords with the development plan aspirations for the re-activation of the wharf.

7.9.2 Due to its location the proposal is considered to have an acceptable impact upon the character and appearance of the area.

7.9.3 The impacts on the amenities of residents have been considered. In particular the impact of the development on air quality and noise have been of

London Borough of Newham
paramount concern. It is considered that the applicant has demonstrated that the effects on residents will not be unduly harmful. Further conditions have been recommended where more information or further mitigation is required.

7.9.4 Transport impacts have been assessed and it is considered that the scheme embraces sustainable transport and that it would have an acceptable impact in terms of the impact on the highway network and to ensure highway safety.
8.0 APPENDIX 1: CONDITIONS AND INFORMATIVES

Conditions

1. **Time limit**

   The development to which this permission relates must be commenced not later than the expiration of THREE YEARS from the date of this permission.

   *Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990.*

2. **Approved plans and documents**

   The development hereby approved shall be carried out in accordance with the following approved plans and documents:

   **Plans**
   - *Existing Site Plan - February 2019 - 12025-EX.SITE PLAN-001*
   - *Location Plan Application Area - February 2019 - 12025-LOC.PLAN-001*
   - *Operations and SIL Designation Plan - November 2018 - 12420/01*
   - *Proposed Drainage Layout Plan - February 2019 - 12025-PRDRL-A_B_C-003*
   - *Section Lines Plan superimposed on Survey - January 2018*
   - *Site Cross Section Elevations - May 2019 - 12420/02*
   - *Site Cross Section Elevations - May 2019 - 12420/03*
   - *Site Plan Aerial View Existing - 12420/01 A*

   **Documents**
   - *Air Quality Assessment - SLR - October 2018*
   - *Air Quality Assessment Addendum Technical Note - SLR - June 2019*
   - *Boundary Asbestos Monitoring Plan - Keltbray - May 2019*
   - *Cumulative Impact Assessment - Matthews & Son - February 2019*
   - *Design & Access Statement - Matthews & Son - February 2019*
   - DAS Appendices:
     - Photographs 1 – 6 – Plaistow Wharf Internal Site Views
     - Photograph 7 – Thames Wharf waste stockpile
     - Photograph 8 – Loaded barge navigating Thames
     - Weighbridge specification
     - Wheel wash specification
     - Office accommodation example floor plan
     - Office accommodation example elevation
     - SPEL Stormceptor Interceptor specification
     - Travel Plan – Cannon Consulting Engineers - February 2019
   - *District Heating Network Assessment – Matthews & Son – July 2019*
   - *Drainage Strategy and SuDS Report - Keltbray - May 2019*
Energy Statement for the Office Building – Keltbray Environmental
Flood Risk Assessment - Ambiental - October 2018
Flood Risk Assessment Appendices
   - Appendix 1.0 – Site Plans
   - Appendix 11.0 – EA Data
   - Appendix 111.0 Supplemental Information
FRA Surface Water Addendum – Matthews & Son – July 2019
Masterplanning Statement - Matthews & Son - April 2019
Masterplanning Statement Addendum – Matthews & Son – June 2019
Noise Impact Assessment - W. A. Hines & Partners - July 2018
Parking and Service Details Including Waste Management Strategy - Matthews & Son - February 2019
Planning Statement - Matthews & Son - March 2019
River Wall Survey Report - Becket Rankin - July 2017
River Wall Survey Plan - Becket Rankin - March 2019
Road Safety Assessment – Cannon Consulting Engineers – July 2019
Security and Crime Prevention Measures – Matthews & Son - March 2019
Site Investigation Report and Environmental and Geotechnical Assessment - Waterman Environmental – Report EN1575 - undated
Site Working Plan Plaistow Wharf, Keltbray, May 2019
Strategic Sites Local Plan Excerpt
Sustainability Statement including Energy Assessment - Matthews & Son - February 2019
Transport Statement - Cannon Consulting Engineers - September 2018
Validation Sampling Protocol - Waterman Environmental - undated

No other drawings or documents apply.

Reason: To ensure that the development is undertaken in accordance with the approved drawings and documents to ensure that the finished appearance of the development will enhance the character and visual amenities of the area and to satisfactorily protect the residential amenities of nearby occupiers.

Compliance Conditions

3. Site Working Plan

The operations associated with the use of land and wharf for the sorting, separating, recycling and transfer of construction, demolition and excavation waste hereby permitted, shall be undertaken at all times in accordance with the 'Site Working Plan' - Prepared by Keltbray Environmental – Dated May 2019.

In addition to the above, a copy of the 'Site Working Plan' - Prepared by Keltbray Environmental - Dated May 2019 shall be displayed within the main office and training shall be provided to all on-site staff.
Reason: To safeguard the amenity of neighbouring premises through the delivery of best practice infrastructure to prevent unneighbourly effects upon nearby residential occupiers and the wider environment.

4. Hours of operation

There shall be no works carried out on the site except between the hours of 0700 and 1800 on Mondays to Fridays and between 0800 and 1800 on Saturdays without the prior written approval of the Local Planning Authority. Dock load out and loading at high tide and associated enclosed storage of materials shall be excluded from this provision.

Reason: To protect the amenity of future occupants and/or neighbours.

5. Noise

Plant operation and activity on site shall not give rise to a BS4142 rating level greater than the background level at the nearest or worst affected residential property.

Reason: To protect the amenity of future occupants and/or neighbours.

6. Wheel Wash Operation

No vehicles shall leave the site if the wheel wash is non-operational.

Reason: To protect the amenity of future occupants and/or neighbours and in the interest of the declared Air Quality Management Area.

7. Consolidated Surfacing

All consolidated surface areas designed to accommodate vehicle movement as shown on drawing Proposed Site Layout Plan - February 2019 - 12025-PRSL-002 – Rev A shall be installed prior to the operation of the development and retained thereafter.

Reason: To protect the amenity of future occupants and/or neighbours and in the interest of the declared Air Quality Management Area.
9.0 APPENDIX 2: HEADS OF TERMS

S106 – Heads of Terms

The recommended Section 106 Legal Agreement Heads of Terms between the Council and the Applicant are set out below:

1. Payment of the Council’s reasonable professional and legal costs, whether or not the agreement completes;

2. Safeguarding of riverside walk as shown at Appendix 3;

10.0 APPENDIX 3: PROPOSED PLANS AND IMAGES

Location Plan

Layout: Orange line shows the Riverside Walk. Greyed area shows the location of concrete hardstanding.

Site

London Borough of Newham
Plaistow Wharf, Silvertown

First Floor

Second Floor

Office Layout

London Borough of Newham
Office Accommodation

Proposed and Existing Site Sections

London Borough of Newham