

## REPORT SUMMARY

<b>REFERENCE NO - 22/03707/FULL</b>		
<b>APPLICATION PROPOSAL</b> Demolition of existing buildings and erection of two new buildings including five units for Class E(g)iii (light industrial) and B8 (storage and distribution) employment uses, with ancillary offices, associated car parking, service yards and landscaping.		
<b>ADDRESS</b> Spectrum House and Millennium House Chapman Way Royal Tunbridge Wells Kent TN2 3EF		
<b>RECOMMENDATION</b> To GRANT planning permission subject to conditions (please refer to section 11.0 of this report for full recommendation)		
<b>SUMMARY OF REASONS FOR RECOMMENDATION</b> <ul style="list-style-type: none"><li>• The proposal would result in the delivery of sustainable development and therefore, in accordance with Paragraph 11 of the NPPF, permission should be granted, subject to all other material considerations being satisfied;</li><li>• There would be significant economic benefits arising from the development, which is within the Limits to Built Development, an Economic Development Area and a Key Employment Area;</li><li>• The development would provide employment opportunities;</li><li>• The development would not have a detrimental impact upon the residential amenity of any neighbouring properties;</li><li>• The development would not have a detrimental impact upon highway safety;</li><li>• Adequate on-site parking would be provided to support the development;</li><li>• The proposal would not result in an unacceptable impact upon drainage and flood risk in the locality;</li><li>• The development would result in ecological net gain;</li><li>• The design of the scheme is considered acceptable;</li><li>• Other issues raised have been assessed and there are not any which would warrant refusal of the application or which cannot be satisfactorily controlled by condition.</li></ul>		
<b>INFORMATION ABOUT FINANCIAL BENEFITS OF PROPOSAL</b> <p>The following are considered to be material to the application:</p> <p><b>Contributions (to be secured through Section 106 legal agreement/unilateral undertaking): N/A</b></p> <p><b>Net increase in numbers of jobs: No details</b></p> <p><b>Estimated average annual workplace salary spend in Borough through net increase in numbers of jobs: No details</b></p> <p>The following are not considered to be material to the application:</p> <p><b>Estimated annual council tax benefit for Borough: N/A</b></p> <p><b>Estimated annual council tax benefit total: N/A</b></p> <p><b>Estimated annual business rates benefits for Borough: Increase from £530,000 to £580,000</b></p>		
<b>REASON FOR REFERRAL TO COMMITTEE</b> <p>The proposal comprises the creation of non-residential floor space by means of new buildings of more than 2000m<sup>2</sup> and is recommended for approval.</p>		
<b>WARD</b> Southborough &	<b>PARISH/TOWN COUNCIL</b>	<b>APPLICANT</b> Tavis House

High Brooms	Southborough Town Council	Properties <b>AGENT</b> Chris Malone
<b>DECISION DUE DATE</b> 06/04/23	<b>PUBLICITY EXPIRY DATE</b> 10/02/23	<b>OFFICER SITE VISIT DATE</b> Various
<b>RELEVANT PLANNING HISTORY (including appeals and relevant history on adjoining sites):</b> The High Brooms Industrial Estate has a long planning history dating from the late 1970s. The history relevant to the specific application site is listed below;		
13/00810/FUL (Spectrum House only)	Permission for continued use of external plant and equipment together with associated screening and condenser units (TW/09/01361, TW/07/03919, TW/04/01637 and TW/10/04073 refers) - Renewal of temporary permission for external plant and equipment	Granted 07/06/13
13/00447/FUL (Millennium House only)	Renewal - Erection of temporary modular building for use as offices - Variation of Condition 1 - Provision of details of Company Travel Plan within 3 months of the date of permission (TW/02/00930/FUL refers)	Granted 18/04/13
13/00804/FUL (whole site)	Switchroom building and associated works including relocation of fuel tanks, new switchboards and transformer enclosures	Granted 05/08/14
10/04073/FUL (Spectrum House only)	Permission for continued use of external plant and equipment together with associated screening and condenser units (TW/09/01361, TW/07/03919 & TW/04/01637 refer). Provision of a new generator, transformer, ringmain and auto changeover unit.	Granted 08/07/11
09/01361/FUL (Spectrum House only)	Permission for continued use of external plant and equipment together with associated screening and condenser units (TW/07/03919 & TW/04/01637 refers)	Granted 30/06/09
07/03919/FUL (Spectrum House only)	External plant and equipment	Granted 15/01/08
04/01637/FUL (whole site)	Retrospective - Temporary generators and fuel storage	Granted 30/09/04
03/00927/FUL (Spectrum House only)	Provision of an extension to house fixed fire extinguishing cylinders	Granted 07/07/03
02/00930/FUL (Millennium House only)	Renewal: erection of temporary modular building for use as offices	Granted 28/11/07
97/02046/FUL (Millennium House only)	Erection of temporary modular building for use as offices for a period of 5 years	Granted 26/05/00
99/01794/FUL (Spectrum House only)	Installation of windows to ground floor - to match existing	Granted 09/11/99
94/00231/FUL (Spectrum House only)	Retrospective - mounted roof condensers hidden by 1.5m louvre screen	Granted 09/05/94
90/01681/FUL (Spectrum House only)	Removal of condition - unrestricted B1 use for new extension (Condition 3 of TW/90/0994 refers)	Granted 10/01/91

90/00994/FUL (Spectrum House only)	Extension to provide additional computer accommodation	Granted	23/08/90
87/01271/REM (Spectrum House only)	Reserved Matters - Computer centre	Granted	02/12/87
87/00666/OUT (Spectrum House only)	Outline (means of access not reserved) - Computer centre printing and warehouse buildings	Granted	04/08/87

## MAIN REPORT

### 1.0 DESCRIPTION OF SITE

- 1.01 This site occupies 1.57ha in the centre of the High Brooms Industrial Estate. The site is currently occupied by two single storey buildings;
- Spectrum House, which is a data storage centre that was granted planning permission in 1987 and constructed shortly thereafter (which becomes vacant in spring 2023); and
  - Millennium House (which is a vacant office) was constructed pursuant to a temporary planning permission in 2000, and then granted two permanent planning permissions in 2002 and 2013.
- 1.02 The site itself is relatively level with some low embankments to the north west of the site, where the internal level is some 1m below street level.
- 1.03 The buildings are surrounded by tall palisade fencing and there is a single access point to the site, leading to a parking area. There is limited soft landscaping with grassed banks and a few shrubs and trees, generally to the immediate perimeter of the site.
- 1.04 The site falls within an existing employment area and is surrounded on all sides by industrial businesses. It is accessed via Chapman Way, a private road that encircles the site and leads to North Farm Road.

### 2.0 PROPOSAL

- 2.01 The proposed development is for the erection of two buildings including five units totalling 8,390.98m<sup>2</sup> GEA for flexible light industrial and storage and distribution uses, with ancillary offices, associated car parking, cycle storage, fencing and landscape planting and earthworks.
- 2.02 There would be a terrace of three units sited along the northern part of the plot and a second block of two along the southern boundary. This creates an inward-looking courtyard, with all car parking and servicing kept to the centre of the site.
- 2.03 The units to the north of the site would have an eaves height of 11m with a ridge of 12.5m. The units to the south will have an eaves height of 9m and a ridge of 10.5m. External materials would be grey cladding with red-painted eaves and doorways.
- 2.04 The proposal consists of a car parking area for each unit. There would be 99 car parking spaces in total, included within the total is 11 disabled space and 5 powered two wheeler parking spaces.

UNIT	GEA Total (m2)	CAR PARKING SPACES	POWERED TWO-WHEELER SPACES	ELECTIC VEHICLES SPACES	HGV LOADING BAYS	Disabled Parking Spaces
1A	1978.51	20	1	2	2	2
1B	1782.01	16	0	2	1	2
1C	2683.11	26	2	3	1	3
2A	973.67	18	1	2	2	2
2B	973.67	19	1	2	2	2
<b>Total</b>	<b>8390.98</b>	<b>99</b>	<b>5</b>	<b>11</b>	<b>8</b>	<b>11</b>

- 2.05 There would be a total of 8 HGV bays across the site with HGV yards for lorries to manoeuvre.
- 2.06 11 active electric vehicle (EV) bays will provided across the site. Cycle parking provision will be provided for each unit. There will be one access point to the site from Chapman Way, on the southern boundary of the site. Entrance to the site will be controlled by a swing gate.
- 2.07 The perimeter of the site will include a soft landscape buffer and the existing tree to the north west of the site will be retained. A fence will enclose the site round the perimeter.

### 3.0 SUMMARY INFORMATION

	Existing	Proposed	Change (+/-)
Site Area	1.57ha	1.57ha	No change
Land use(s) including floor area(s)	Class E office and data processing/storage	Flexible use of Class B8 (storage and distribution), and Class E office/light industrial	
Car parking spaces (inc. disabled)	112	99	-13
Floorspace (GIA)	4078.3 sqm	7947.6 sqm	+3869.3 sqm
Max height	Spectrum House: 6.5m Millennium House: 5.1m	Northern building: 12.5 Southern building: 10.5	Northern building: +6.0m Southern building: +5.4m
Max eaves height	Spectrum House: 5.8m Millennium House: 4.0m	Northern building: 11 Southern building: 9	Northern building: +5.2m Southern building: +5m

#### **4.0 PLANNING CONSTRAINTS**

- TWBC Quarry/Landfill Site - KCC Landfill Atlas - Sept 1990 (Chapman's Quarry)
- Limits to built development - inside
- Potentially Contaminated Land
- Site of Special Scientific Interest to the perimeter of High Brooms Industrial Park

#### **5.0 POLICY AND OTHER CONSIDERATIONS**

The National Planning Policy Framework (NPPF) 2021  
National Planning Practice Guidance (NPPG)

##### **Site Allocations DPD (July 2016)**

Policy AL/STR 1: Limits to Built Development

##### **Tunbridge Wells Borough Core Strategy 2010**

Core Policy 1: Delivery of Development

Core Policy 4: Environment

Core Policy 5: Sustainable Design and Construction

Core Policy 7: Employment Provision

Core Policy 9: Tunbridge Wells

##### **Tunbridge Wells Borough Local Plan 2006**

Policy EN1: Development Control Criteria

Policy EN8: Lighting

Policy TP4: Access to the Road Network

Policy TP5: Parking Provision with New Development

Policy TP9: Cycle Parking

Policy ED1: Location of large-scale (500 sq metres or greater gross floorspace) or greater proposals for B1 light industrial development within Economic Development Areas

Policy ED3: Location of B2 and B8 Uses within Economic Development Areas

Policy TP1: Major development requiring Transport Assessments and a Travel Plan

Policy TP2: Multi-modal access for smaller-scale non-residential development

##### **Supplementary Planning Documents:**

Renewable Energy SPD (2007 and update January 2014) and 2019 Energy Policy Position Statement

Noise and Vibration SPD

Contaminated Land SPD

##### **Other documents:**

KCC Supplementary Planning Guidance SPG 4 - Kent Vehicle Parking Standards July 2006

##### **Tunbridge Wells Borough Submission Local Plan 2020-2038**

Policy STR1: The Development Strategy

Policy STR2: Place Shaping and Design

Policy STR3: Brownfield Land

Policy STR4: Ensuring Comprehensive Development

Policy STR5: Infrastructure and Connectivity

Policy STR6: Transport and Parking

Policy STR7: Climate Change

Policy STR8: Conserving and Enhancing the Natural, Built, and Historic Environment

Policy STR/RTW1: The Strategy for Royal Tunbridge Wells

Policy EN1: Sustainable Design

Policy EN2: Sustainable Design Standards  
Policy EN3: Climate Change Mitigation and Adaptation  
Policy EN8: Outdoor Lighting and Dark Skies  
Policy EN9: Biodiversity Net Gain  
Policy EN12: Trees, Woodland, Hedges, and Development  
Policy EN14: Green, Grey, and Blue Infrastructure  
Policy EN16: Landscape within the Built Environment  
Policy EN21: Air Quality  
Policy EN24: Water Supply, Quality, and Conservation  
Policy EN26: Sustainable Drainage  
Policy EN27: Noise  
Policy EN28: Land Contamination  
Policy ED1: Key Employment Areas  
Policy ED2: Retention of Existing Employment Sites and Buildings  
Policy ED3: Digital Communications and Fibre to the Premise  
Policy TP1: Transport Assessments, Travel Plans, and Mitigation  
Policy TP3: Parking Standards

## **6.0 LOCAL REPRESENTATIONS**

6.01 The application was publicised by way of site notice in January 2023. It was also advertised in a local newspaper.

6.02 No comments have been received in response.

## **7.0 CONSULTATIONS**

### **Southborough Town Council**

7.01 **(07/02/23)** - noted

### **Environment Agency**

7.02 **(30/01/23)** - The proposed development overlies Historic Landfill 2200/7448 Chapmans Quarry. Consider that planning permission could be granted to the proposed development as submitted as long as the following planning conditions are included as set out below. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would object to the application. (*Officer Note: Recommended conditions are included*)

7.03 **(19/01/23)** object to the planning application, as submitted, because the risks to groundwater from the development are unacceptable. The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed. We recommend that planning permission should be refused on this basis in line with paragraph 174 of the National Planning Policy Framework.

### **National Highways**

7.04 **(26/01/23)** – no objection

### **Southern Gas Networks**

7.05 **(12/01/23)** – standard advice regarding potential for gas pipes beneath the application site

### **UK Power Networks**

7.06 **(07/02/23)** - The proposed development is in close proximity to a UKPN substation and have the following observations to make:

- 7.07 If the proposed works are located within 6m of the substation, then they are notifiable under the Party Wall etc. Act 1996. The Applicant should provide details of the proposed works and liaise with the Company to ensure that appropriate protective measures and mitigation solutions are agreed in accordance with the Act. The Applicant would need to be responsible for any costs associated with any appropriate measures required.
- 7.08 UKPN engineering guidelines state that the distance between a dwelling of two or more stories with living or bedroom windows overlooking a distribution substation should be a minimum of ten metres if the transformer is outdoor, seven metres if the transformer has a GRP surround or one metre if the transformer is enclosed in a brick building. It is a recognised fact that transformers emit a low level hum which can cause annoyance to nearby properties. This noise is mainly airborne in origin and is more noticeable during the summer months when people tend to spend more time in their gardens and sleep with open windows.
- 7.09 A problem can also occur when footings of buildings are too close to substation structures. Vibration from the transformer can be transmitted through the ground and into the walls of adjacent buildings. This, you can imagine, is very annoying.
- 7.10 In practice there is little that can be done to alleviate these problems after the event. We therefore offer advice as follows:
1. The distance between buildings and substations should be greater than seven metres or as far as is practically possible.
  2. Care should be taken to ensure that footings of new buildings are kept separated from substation structures.
  3. Buildings should be designed so that rooms of high occupancy, i.e. bedrooms and living rooms, do not overlook or have windows opening out over the substation.
  4. If noise attenuation methods are found to be necessary we would expect to recover our costs from the developer.
- 7.11 Other points to note:
5. UK Power Networks require 24 hour vehicular access to their substations. Consideration for this should be taken during the design stage of the development.
  6. The development may have a detrimental impact on our rights of access to and from the substation. If in doubt please seek advice from our Operational Property and Consents team at Barton Road, Bury St Edmunds, Suffolk, IP32 7BG.
  7. No building materials should be left in a position where they might compromise the security of the substation or could be used as climbing aids to get over the substation surround.
  8. There are underground cables on the site associated with the substation and these run in close proximity to the proposed development.
  9. All works should be undertaken with due regard to Health & Safety Guidance notes HS(G)47 Avoiding Danger from Underground services. This document is available from local HSE offices.

### **Southern Water**

- 7.12 **(31/01/23)** - investigations indicate that Southern Water can facilitate foul sewerage run off disposal to service the proposed development. Southern Water requires a formal application for a connection to the public sewer to be made by the applicant or developer.
- 7.13 Southern Water has undertaken a desktop study of the impact of the proposed development on the existing public surface water network. The results of this assessment indicate that with a connection at the “practical point of connection”, as defined in the New Connections Services implemented from 1st April 2018, there is an increased risk of flooding if the proposed surface water run off rates are to be discharged at proposed connection points.
- 7.14 Alternatively, if this is a brownfield site redevelopment, the developer can discharge surface water flow no greater than existing levels if proven to already be connected and it is ensured that there is no overall increase in flows into the surface water system. The developer will be required to provide a topographical site survey and/or a CCTV survey with the connection application showing the existing connection points, pipe sizes, gradients and calculations confirming the proposed surface water flow will be no greater than the existing contributing flows.
- 7.15 Further advice regarding SUDS provided.

### **KCC Flood and Water Management**

- 7.16 **(24/01/23)** - Kent County Council as Lead Local Flood Authority have reviewed the Flood Risk Assessment and Drainage Strategy prepared by Pinnacle Consulting Engineers Ltd (05/12/2022) and understand that surface water will be conveyed via a piped network discharging from the site at 8.66 l/s for all events up to and including the 100 (+CC) storm events. 1,150 m<sup>3</sup> of attenuation will be provided via a cellular storage system and petrol interceptors will also provide pollution mitigation for runoff from parking areas.
- 7.17 While no hydraulic modelling or calculations have been provided HR Wallingford Surface Water Storage Volume Estimation Tool recommends a total of 1117 m<sup>3</sup> of attenuation will be required, suggesting the 1,150 m<sup>3</sup> proposed is appropriate. However, at detailed design stage KCC would expect for the drainage network to be fully modelled.
- 7.18 Two conditions recommended. (*Officer Note: Recommended conditions are included*)

### **KCC Highways**

- 7.19 **(26/01/23)** – No objection, subject to the following conditions being added;
- Construction Management Plan.
  - Provision and permanent retention of the vehicle parking spaces shown on the submitted plans.
  - Minimum of 10% require EV charging facilities and the remaining spaces require passive provision for EV charging.
  - Provision and permanent retention of the cycle parking facilities.

### **Kent Police**

- 7.20 **(23/01/23)** - Have considered this application regarding Crime Prevention Through Environmental Design (CPTED) in accordance with the National Planning Policy Framework (NPPF).

- 7.21 No objections raised. Recommendations made for perimeter security and access control, car parks, lighting, CCTV, mail delivery arrangements, doorsets and windows, alarms, PV panels, cycle and bin storage and landscaping.

**Mid Kent Environmental Protection**

- 7.22 **(10/02/23)** - Noise – The report was competently undertaken and modelled using CADNA-A software to give levels at residential accommodation. They considered traffic noise, Industrial usage noise, plant noise and delivery noise. The levels showed a worst case scenario where the noise levels slightly exceeded the what EP would have liked.
- 7.23 Discussions with the Managing director of the ACCON UK Noise indicate that we could resolve the issue by better management of deliveries by implementing a comprehensive Delivery Noise Management Plan.
- 7.24 To ensure that the predictions are accurate, EHO indicated that EP would require a verification report after construction was complete and the site is operating. This would determine if further mitigation is necessary. There would also be a condition on new plant so that applications with specific noise assessments would be needed.
- 7.25 Air Quality – The air quality report was comprehensive and agree with the conclusion that there is no need for further measures.
- 7.26 Lighting – The report indicated that the lighting would all be LED and modern units that prevent horizontal and upward light spill. This will probably be a vast improvement on the current situation so have no issues with this aspect of the development.
- 7.27 Construction/Demolition – The submitted report focused a lot on biodiversity but did touch on controls for dust suppression. They were obviously not aware of our Environmental Code of Development Practice. Would like to see a good construction/demolition plan based on the above and other relevant practices such as BS5228 Noise Vibration and Control on Construction and Open Sites, the Control of Dust from Construction Sites (BRE DTi Feb 2003) and the Institute of Air Quality Management (IAQM) 'Guidance on the Assessment of Dust from Demolition and Construction' "
- 7.28 RECOMMENDATIONS: That conditions be imposed to ensure that necessary details and information is obtained from the developer and approved by the local authority.
- 7.29 Conditions: Post development Noise Verification Assessment; New plant restrictions; Noise Management Plan for approved use (all uses except construction). Demolition/Construction Report.

**TWBC Parking Services**

- 7.30 **(25/01/23)** – no comment

**TWBC Landscape & Biodiversity Officer**

- 7.31 **(10/01/23)** - The ecological survey, bat survey and landscape proposals are, subject to the conditions recommended below acceptable. The proposal has demonstrated a net gain in biodiversity in excess of policy requirements. Suggested conditions: A precautionary bat emergence survey prior to demolition in accordance with best practice. A scheme of avoidance, mitigation and enhancements in respect of protected species and biodiversity. A management plan for landscaped area (assuming that the proposed landscape works are an approved plan).

## **8.0 APPLICANT'S SUPPORTING COMMENTS (taken from conclusion of the Planning Statement)**

- 8.01 The proposed development is for the erection of a new industrial unit comprising a total of 8,390.98sqm GEA of flexible light industrial and storage and distribution employment floor space, with associated service yard, car parking and landscape planting.
- 8.02 The application site falls within a Key Employment Area where emerging policy identifies the High Brooms Industrial Estate as a location for light industrial (Egiii) and storage and distribution (B8) uses. The policy has passed through the examination in public stage and there has been no published issues or questions with the emerging Policy ED1 that affects the High Brooms Industrial Estate. Accordingly it holds significant weight when there is an out-of-date adopted policy in accordance with the NPPF. As such, the principle of development for light industrial and storage and distribution uses on the site should be seen as acceptable in planning terms.
- 8.03 The Transport Assessment submitted as part of this application has shown that the proposed development would result in a decrease in vehicle movements throughout the day, concluding that there would be less impact on the local highway network. The scheme will provide the highest design quality industrial units with access, parking and service yard laid out in accordance with highway requirements. Submitted reports have shown that there will be no highway capacity or safety issues and as such the scheme should be seen as an improvement in planning impact terms on the local area.
- 8.04 The design of the proposal is of the highest standard and will introduce a modern industrial unit that will attract investment to the area and local economy. The scale of the building is in keeping with modern industrial units and the surrounding industrial estate. The buildings are set back from the road frontage and will allow for an enhanced landscaped frontage.
- 8.05 There are no flood risk, drainage, land contamination, ecological, air quality or noise issues that cannot be mitigated through a standard condition with any consent. The energy and BREEAM requirements of the development plan will be adhered to.

## **9.0 BACKGROUND PAPERS AND PLANS**

- 9.01 Application form  
Cover letter 23/12/23  
Air Quality Assessment 11/10/22  
Arboricultural Impact Assessment (including Tree Survey, Tree Protection Plan, Arboricultural Method Statement (24/08/22)  
Archaeological desk based assessment October 2022  
Bat Survey Report October 2022  
Biodiversity Net Gain Assessment November 2022 (and attached BNG calculator)  
BREEAM Pre-Assessment Report November 2022  
Construction Environmental Management Plan – Biodiversity November 2022  
Energy and Sustainability Statement November 2022  
External impact lighting assessment December 2022  
Flood Risk Assessment & Drainage Strategy (05/12/22)  
Noise Impact Assessment (07/12/22)  
Planning Statement December 2022  
Preliminary Ecological Appraisal October 2022

Transport Statement 27/11/22  
Design and Access Statement December 2022  
11476-PL002-A Existing Site Layout  
11476-PL004-- Existing Building - Spectrum House  
11476-PL005 Existing - Millennium House  
11476-PL\_1\_001 Unit 1 - Area Schedule  
11476-PL\_2-001 Unit 2 - Area Schedule

## 10.0 APPRAISAL

10.01 The site is within the LBD and within a designated Economic Development Area where there is a presumption in favour of new development such as this. The main issues are therefore considered to be design and the impact on trees, residential amenity, highways/parking, flooding/drainage matters, ecology, air quality/land contamination and other relevant matters.

### **Principle of Development**

10.02 The site lies within the LBD and an Economic Development Area (EDA) as defined within the Proposals Map. Policy ED1 supports large-scale B1 light industrial development over 500sqm in areas such as these. Policy ED3 supports proposals for B2 and B8 uses in EDAs.

10.03 Core Policy 7 (2) does not provide this differentiation and simply seeks to retain employment floorspace in Key Employment Areas, of which this industrial estate is one. The site is considered to meet all three criteria in CP7 (3);

- It is well located to main roads and public transport networks;
- It is capable of providing, through redevelopment, good quality modern accommodation attractive to the market
- It is capable of meeting a range of employment uses to support the local economy

10.04 The proposal also maintains employment floorspace in accordance with CP7 (1).

10.05 The proposed redevelopment of the site makes better, more efficient use of the site, which comprises two dated single storey pre-fabricated buildings. The proposal is likely to increase employment opportunities on the site in modern facilities suitable for modern business needs.

10.06 NPPF Para 81 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

10.07 The proposal also meets the NPPF aims and objectives for areas such as this and thus the principle of the development is considered to be satisfied.

### **Design, trees and visual impact**

10.08 Although this is for new development within an existing industrial estate, design and layout are still key issues. NPPF Para 130 states that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) 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.*

10.09 Para 134 states development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design. Conversely, significant weight should be given to:

- a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*
- b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.*

10.10 LP Policy EN1 states at criteria (3), (4) (6) and (7);

- 3 The design of the proposal, encompassing scale, layout and orientation of buildings, site coverage by buildings, external appearance, roofscape, materials and landscaping, would respect the context of the site and take account of the efficient use of energy;*
- 4 The proposal would not result in the loss of significant buildings, related spaces, trees, shrubs, hedges, or other features important to the character of the built up area or landscape;*
- 6 The design, layout and landscaping of all development should take account of the security of people and property and incorporate measures to reduce or eliminate crime; and*
- 7 The design of public spaces and pedestrian routes to all new development proposals should provide safe and easy access for people with disabilities and people with particular access requirements.*

10.11 Core Policy 4: Environment; seeks amongst other things to conserve and enhance the locally distinctive sense of place and character. Core Policy 5: Sustainable Design and Construction identifies that the Council will apply and encourage sustainable design and construction principles and best practice. Developments will also be required to create safe, accessible, legible and adaptable environments plus conserve and enhance the public realm.

10.12 The location of the site is on wholly private land (as the adopted highway ends at the junction of North Farm Road/Chapman Way). However it still amounts to semi-public space as there is free movement of vehicles and pedestrians in and around the complex, with barriered entry at weekends/during the evenings.

- 10.13 The surrounding buildings are all large structures in commercial/industrial use, some of which are split into smaller units. Some of these were originally built as large warehouses and are now in storage/distribution use, or used for light industry. The large building to the north west (Unit 5) is in use as a large gymnastics academy. There is landscaping to the front of some of the buildings, in the form of regularly managed trees, hedges/shrubs and grassed areas.
- 10.14 Given the context of large, industrial scale buildings the height, bulk and massing of the units is considered acceptable. The design / appearance is sympathetic to the context of the site including its levels/topography. The appearance is of a modern industrial style; materials can be secured by condition.
- 10.15 Unusually a full set of landscaping drawings has been submitted which shows a combination of tree and shrub planting around the site. This can be secured by condition, as can a landscape management plan (as recommended by the Landscape & Biodiversity Officer). The existing trees on site are of limited value and were all planted after the site was developed in the 1980s. No objection is raised to their loss, given the detailed landscaping proposals submitted with the application. KCC Highways also raise no objection to the size/arrangement of the parking/turning areas.
- 10.16 A condition has been added to secure the details sought by Kent Police.

#### **Residential amenity**

- 10.17 There are residential areas away from the industrial estate in High Brooms to the north, east and west. Given the significantly lower land level of the site and the distance to the nearest residential dwellings, there would be no impact from overlooking, loss of light or outlook towards any residential dwelling.
- 10.18 The Mid Kent EP team have recommended conditions relating to noise. This will involve the submission of a noise management plan for ongoing use of the site; and a verification report to ensure the noise levels specified in the submitted noise report are met or bettered and that any mitigation needed to achieve these objectives is implemented. Restrictions on new plant and a Construction Method Statement are also suggested.

#### **Highways/parking**

- 10.19 No alterations are proposed to the access point on to the public highway. Neither National Highways nor KCC Highways raise objections in terms of the traffic generated by the development nor to matters of safety on the public highway. Due to the higher number of vehicle movements associated with the existing use of the site, the proposals would reduce vehicle trips by 23 two way vehicle movements during the AM peak hour of 0800-0900 with a further reduction of 69 two way movements during the PM peak hour of 1700 – 1800. A decrease of 61 inbound and 66 outbound movements are expected over the day.
- 10.20 The proposal would result in a decrease in parking on the site (112 current vs 99 proposed) however this relates to the lower demand associated with light industrial and storage distribution uses compared to offices. Again KCC are satisfied with this level of provision and the parking/turning/loading areas can be secured by condition, as can cycle storage details (as only areas, rather than the actual shelters, are shown) plus the Travel Plan.

#### **Flooding and drainage**

- 10.21 NPPF Para 166 states that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Para 168 states that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The site lies outside of the Flood Zone 2/3 and is not considered to be at risk of flooding. The site is at a low risk of fluvial flooding, and a low risk of surface and reservoir water flooding.
- 10.22 The site is within a groundwater source protection zone and the Environment Agency (EA) originally objected on these grounds; their first consultee reply advised that further information should have been provided up front given the site is a former landfill/quarry. The applicant responded that they understand that there is a need for a risk assessment to be carried out on the chosen foundation proposal to demonstrate that it will not allow migration of contaminants into the underlying groundwater aquifer. However, this requires both a suitably scoped intrusive site investigation report and a commercially viable foundation methodology satisfying both price and environmental concerns. This is likely to be impractical to produce at this stage of the development program. The EA accepted this and have recommended a suite of conditions relating to drainage, foundation design and foul sewage matters (KCC as Lead Local Flood Authority have also recommended conditions relating to drainage and implementation of a SUDS system).

#### **Land contamination and air quality**

- 10.23 The site is classed as potentially contaminated land owing to its former uses. The EA have recommended land contamination conditions. The Mid Kent Environmental Protection team have not recommended further work is necessary on either matter.

#### **Ecology and biodiversity**

- 10.24 The application includes a Preliminary Ecological Assessment. Habitats within the proposed development area were assessed as being of value to wildlife within the local vicinity with potential to support bats, reptiles, breeding birds, badgers and hedgehogs and these species may pose a constraint to works.
- 10.25 Millennium House was assessed as offering low potential to support roosting bats. The PEA recommended that targeted surveys in respect to bats are undertaken on building 2 to determine presence or likely absence. One of these has yet to be undertaken. The survey was carried out in September which is in the active season for bat emergence surveys but is not prime period for a single activity survey. As a result, a single additional survey is recommended prior to development, to be carried out in late May, in suitable weather conditions, to ensure and back up the initial results. Normally such surveys would be required 'up front' with the application however given that one survey has already been undertaken (which has found no bat activity at the site) the Landscape & Biodiversity Officer has agreed that this second survey can be sought by planning condition.
- 10.26 In addition, a precautionary approach to site clearance in respect to reptiles, breeding birds, badgers and hedgehogs is recommended to minimise any adverse impacts on these species groups.
- 10.27 Details regarding specific mitigation, including further surveys and precautionary working practices together with habitat enhancement measures are provided.
- 10.28 A Biodiversity Net Gain Assessment has been carried out and an overall net gain of 35.84% in habitat units from the existing baseline has been calculated. It should be noted that the BNG assessment does not capture other methods of ecological

enhancement such as the inclusion of bat and bird boxes and invertebrate hotels (which are shown to be provided on the landscaping plans).

10.29 A full, details scheme of biodiversity mitigation and enhancement can be secured by condition.

10.30 The Southborough Pit Site of Special Scientific Interest to the perimeter of High Brooms Industrial Park is a geological feature some 70m – 100m away from the application site. It can only be affected by development within the designated area, which is not the case here.

**11.0 RECOMMENDATION – GRANT** Subject to the following conditions:

*Three-year implementation*

- (1) The development hereby permitted shall be begun before the expiration of 3 years from the date of this decision.

Reason: To comply with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

*Approved plans*

- (2) The development hereby permitted shall be carried out in accordance with the following approved plans:

PL\_2-100 Unit 2 - Ground Floor Plan  
PL\_2-101 Unit 2 - First Floor Plan  
PL\_2-102 Unit 2 - Roof Plan  
PL\_2-103 Unit 2 – Elevations  
PL-12-001 Proposed Landscape General Arrangement 1/2  
PL-12-002 Proposed Landscape General Arrangement 2/2  
PL\_001-A - Site Location Plan  
PL\_003-A Proposed Site Layout  
PL\_1\_100-A - Proposed Ground Floor Plan - Unit 1  
PL\_1\_101-A Proposed First Floor Plan - Unit 1  
PL\_1\_102-A Proposed Roof Plan - Unit 1  
PL\_1\_103-A - Proposed Elevations - Unit 1  
Travel Plan (Stunt Consulting, 29/11/22)

Reason: To clarify which plans have been approved.

*External materials*

- (3) Notwithstanding the details submitted with the application and the approved plans, prior to the commencement of above ground construction upon the development hereby approved, written details including source/ manufacturer, of external finishing materials including hard landscaping and surfacing shall be submitted to and approved in writing by the Local Planning Authority.

The development shall be carried out using the approved materials unless agreed otherwise in writing by the Local Planning Authority.

Reason: In the interests of visual amenity

*Refuse storage/screening*

- (4) Before any building is occupied, details for the storage and screening of refuse shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To facilitate the collection of refuse, preserve visual amenity and to reduce the occurrence of pests.

*Cycle storage*

- (5) Prior to the first occupation of the development hereby permitted, details of covered bicycle storage shall be submitted to and approved in writing by the Local Planning Authority. The approved bicycle storage shall be completed prior to occupation of the development and shall thereafter be retained.

Reason: To ensure the provision and retention of adequate off-street parking facilities for bicycles in the interests of highway safety.

*Renewable energy*

- (6) Notwithstanding the details submitted with the application and the approved plans, prior to the commencement of above ground construction upon the development hereby approved, written and illustrative details for renewable energy technologies within the development shall be submitted to, and approved in writing by the Local Planning Authority.

This scheme shall provide a minimum of 15% of the approved parking bays with active electric charging spaces distributed across allocated and unallocated bays; and the remaining bays as passive charging spaces prior to the use of the site commencing. All Electric Vehicle chargers provided within the development shall be provided to Mode 3 standard (providing up to 7kw) and SMART (enabling Wifi connection).

The development shall be carried out in accordance with the approved details prior to the first occupation of the development and thereafter be retained.

Reason: To ensure a satisfactory standard of development which meets the needs of current and future generations.

*Landscape management and boundary treatment*

- (7) Notwithstanding the details submitted with the application and the approved plans, prior to the first occupation of the development hereby permitted, the following shall be submitted to and be approved in writing by the Local Planning Authority;
- Boundary treatment details: this shall include a plan indicating the positions, design, materials and type of boundary treatment to be erected.
  - A landscape management plan (including timetable for implementation) for all approved landscaped areas.

The development shall then be carried out in accordance with the approved details and shall be permanently maintained.

Reason: In the interests of the amenity of the area.

*Landscape implementation*

- (8) All planting, seeding or turfing comprised in the approved details of landscaping shall be carried out in the first planting and seeding seasons following the occupation of the buildings or the completion of the development, whichever is the sooner; and any trees or plants whether new or retained which within a period of 5 years from the

completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to any variation.

Reason: In order to protect and enhance the amenity of the area.

*Construction Method Statement*

- (9) Notwithstanding the details submitted with the application and the approved plans, prior to the commencement of the development a Construction Method Statement shall be submitted to and approval in writing by the Local Planning Authority.

The document shall be produced in accordance with the Code of Construction Practice and BS5228 Noise Vibration and Control on Construction and Open Sites, the Control of Dust from Construction Sites (BRE DTi Feb 2003) and the Institute of Air Quality Management (IAQM) 'Guidance on the Assessment of Dust from Demolition and Construction'.) unless previously agreed in writing by the Local Planning Authority. The code shall include:

- An indicative programme for carrying out the works
- Measures to minimise the production of dust on the site(s)
- Measures to minimise the noise (including vibration) generated by the construction process to include the careful selection of plant and machinery and use of noise mitigation barrier(s)
- Hours of working;
- Maximum noise levels expected 1 metre from the affected façade of any residential unit adjacent to the site(s)
- Design and provision of site hoardings
- Management of traffic visiting the site(s) including temporary parking or holding areas
- Provision of off road parking for all site operatives
- Measures to prevent the transfer of mud and extraneous material onto the public highway
- Measures to manage the production of waste and to maximise the re-use of materials
- Measures to minimise the potential for pollution of groundwater and surface water
- The location and design of site office(s) and storage compounds
- The location of temporary vehicle access points to the site(s) during the construction works
- The arrangements for public consultation and liaison during the construction works

Reason: To protect the amenity of local residents and in the interests of highway safety. This is a pre-commencement condition as it addresses matters which arise from the commencement of demolition works

*Noise Management Plan*

- (10) Prior to the first use of the development, a Noise Management Plan covering the entirety of the operation shall be submitted for approval to the Local Planning Authority. The plan shall include but not be limited to examples such as hours of operation and delivery, control of noise from plant and machinery, noise from internal and external activities. The plan shall include procedures for response to complaints from residents or the Local Authority. It shall also include a review mechanism in response to justified complaints. Once approved the plan shall be implemented in accordance with the approved details.

Reason: To protect the amenity of local residents

*Post development Noise Verification Assessment*

- (11) Within either;
- one calendar month of the occupation of all five units within the development hereby approved, or;
  - within 12 months of the date of the practical completion of the development hereby approved,

whichever occurs earlier, a noise report by a qualified and suitable acoustic consultant shall be submitted to and approved in writing by the Local Planning Authority.

The report shall ensure that the levels specified in the previously submitted Noise Impact Assessment (ACCON UK, 04/12/22) are met or bettered; and that any mitigation needed to achieve these objectives is implemented (along with a timetable for its implementation). The development shall subsequently be occupied and used in accordance with the approved details.

Reason: To protect the amenity of local residents

*New plant/ducting*

- (12) No new plant or ducting system other than that specified in the submitted Noise Impact Assessment (ACCON UK, 04/12/22) shall be installed or operated without the prior written planning permission of the Local Planning Authority.

Reason: To protect the residential amenity of the locality

*Restrictions on additional floorspace*

- (13) For the avoidance of doubt and notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order), no additional internal floor space shall be created within the development hereby approved without the express written planning permission of the Local Planning Authority.

Reason: In order to protect the amenities of the locality and because additional floorspace could affect the quantum of on-site vehicular parking required to serve the development, which is based upon the floor area indicated on the planning application submitted only. Any further floor space has the potential to affect parking provision, which would need further consideration in the interests of highway safety and management.

*Parking/turning/loading space*

- (14) The area shown on the plans as vehicle parking, loading, off-loading and turning space, shall be surfaced and drained in accordance with details approved pursuant to condition 3 before the premises are first occupied. It shall be retained for the use of the occupiers of, and visitors to, the premises, and no permanent development, whether or not permitted by Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting the Order), shall be carried out on that area of land or in such a position as to preclude its use.

Reason: Development without provision of adequate accommodation for the parking, loading, off-loading and turning of vehicles is likely to lead to such activities inconvenient to other road users

*Finished floor level*

- (15) Prior to the commencement of development (excluding demolition of the existing building) details of the finished floor level of the development hereby permitted shall be submitted to and approved in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved details.

Reason: To ensure a satisfactory appearance on completion of the development.

*Restrictions in use*

- (16) The development hereby approved shall not be used other than for Class E(g)iii (light industrial) and B8 (storage and distribution) purposes and not for any other purpose whether or not in the same use class of the Schedule to the Town and Country Planning (Use Classes) Order 1987 or any subsequent Order revoking or re-enacting that Order, or whether the alternative use is permitted by virtue of Article 3 and Schedule 2 Part 3 of the Town and Country Planning (General Permitted Development) Order 2015 or any Order revoking or re-enacting that Order.

Reason: This is the basis on which the application has been made and in the interests of the amenity of the locality and highway safety.

*Secured by Design*

- (17) Prior to the commencement of development hereby approved (excluding demolition work and construction of footings/foundations), a scheme which references the comments of Kent Police pursuant to the Secured by Design initiative (dated 23 January 2023) and which demonstrates, as far as practicable, how those measures will be incorporated into the new development shall be submitted to and approved in writing by the Local Planning Authority. The development shall then be carried out in accordance with the approved details and thereafter retained.

Reason: In the interests of good design and the creation of development where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

*Sustainable Surface Water Drainage Scheme*

- (18) Development (excluding demolition of the existing buildings) shall not begin until a detailed sustainable surface water drainage scheme for the site has been submitted to (and approved in writing by) the local planning authority. The detailed drainage scheme shall be based upon the Flood Risk Assessment and Drainage Strategy prepared by Pinnacle Consulting Engineers Ltd (05/12/2022) and shall demonstrate that the surface water generated by this development (for all rainfall durations and intensities up to and including the climate change adjusted critical 100 year storm) can be accommodated and disposed of without increase to flood risk on or off-site.

The drainage scheme shall also demonstrate (with reference to published guidance):

- that silt and pollutants resulting from the site use can be adequately managed to ensure there is no pollution risk to receiving waters.
- appropriate operational, maintenance and access requirements for each drainage feature or SuDS component are adequately considered, including any proposed
- arrangements for future adoption by any public body or statutory undertaker.

The drainage scheme shall be implemented in accordance with the approved details.

Reason: To ensure the development is served by satisfactory arrangements for the disposal of surface water and to ensure that the development does not exacerbate the risk of on/off site flooding.

*Surface Water Drainage System Verification Report*

- (19) No building on any phase (or within an agreed implementation schedule) of the development hereby permitted shall be brought into use until a Verification Report, pertaining to the surface water drainage system and prepared by a suitably competent person, has been submitted to and approved by the Local Planning Authority. The Report shall demonstrate that the drainage system constructed is consistent with that which was approved. The Report shall contain information and evidence (including photographs) of details and locations of inlets, outlets and control structures; landscape plans; full as built drawings; information pertinent to the installation of those items identified on the critical drainage assets drawing; and, the submission of an operation and maintenance manual for the sustainable drainage scheme as constructed.

Reason: To ensure that flood risks from development to the future users of the land and neighbouring land are minimised, together with those risks to controlled waters, property and ecological systems, and to ensure that the development as constructed is compliant with and subsequently maintained pursuant to the requirements of paragraph 165 of the National Planning Policy Framework.

*Land contamination*

- (20) No development approved by this planning permission (excluding demolition of the existing buildings) shall commence until a strategy to deal with the potential risks associated with any contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:

- all previous uses;
- potential contaminants associated with those uses;
- a conceptual model of the site indicating sources, pathways and receptors; and
- potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 174 of the National Planning Policy Framework.

- (21) If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing

how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 174 of the National Planning Policy Framework.

*Foul drainage strategy*

- (22) Development hereby approved (excluding demolition of the existing buildings) shall not commence until a foul drainage strategy, detailing how the developer intends to ensure that appropriate foul drainage is implemented (with a connection to foul sewer), has been submitted to and approved by, the local planning authority in consultation with the (water undertaker and) EA. The development shall be constructed in line with the agreed detailed design and recommendations of the strategy. No occupation of any premises can take place until the installed scheme is confirmed as meeting the agreed specifications (and connections are made to the public foul sewer network).

Reason To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in line with paragraph 174 of the National Planning Policy Framework.

*Surface water infiltration*

- (23) No drainage systems infiltration of surface water drainage into the ground is permitted other than with the written planning permission of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 174 of the National Planning Policy Framework.

*Foundation design*

- (24) Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written planning permission of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated by a piling risk assessment that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 174 of the National Planning Policy Framework.

*Biodiversity mitigation and enhancement*

- (25) Notwithstanding the submitted drawings and all supporting documentation, no development shall take place until a scheme for the avoidance, mitigation and enhancement of biodiversity for areas outside the control of the approved landscape and ecological management plan has been submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall take account of any protected species that have been identified on the site, and in addition shall have regard to the enhancement of biodiversity generally. It shall also include a precautionary bat emergence survey which shall have been undertaken prior to demolition of the existing buildings in accordance with best practice.

It shall be implemented in accordance with the approved proposals within it and shall be carried out in perpetuity unless otherwise agreed in writing by the Local Planning Authority.

Reason: To protect the existing populations of protected species and to improve their habitat on the site. This is a pre-commencement condition as biodiversity matters will need to be addressed from the beginning of the construction phase.

*Travel Plan*

- (26) The approved Travel Plan measures shall be implemented within three months of the first occupation of the buildings hereby permitted and thereafter maintained.

Reason: In order to realise a sustainable pattern of development in the area

## **INFORMATIVES**

- 1) Your attention is drawn to the Council's Environmental Code of Development Practice for Construction Sites, the terms of which should be met in carrying out the development.
- 2) Piling can result in risks to groundwater quality by mobilising contamination when boring through unknown material and bedrock layers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater. If Piling is proposed, a Piling Risk Assessment must be submitted, written in accordance with EA guidance document "*Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater & Contaminated Land Centre report NC/99/73*".
- 3) Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system. There should be no discharge into land impacted by contamination or land previously identified as being contaminated. There should be no discharge to made ground. There must be no direct discharge to groundwater, a controlled water.

Case Officer: Richard Hazelgrove

- NB For full details of all papers submitted with this application please refer to the relevant Public Access pages on the council's website.

The conditions set out in the report may be subject to such reasonable change as is necessary to ensure accuracy and enforceability.