

## Churchfields Road BR3

### London Electricity Board Depot, Churchfields Road, Beckenham

SLR Project No.: 237324

7 April 2025

Revision: Issue

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## REBUTTAL TO LB BROMLEY

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### 1.0 Introduction

- 1.1 A retrospective planning application was submitted in March 2024 for proposals at the London Electricity Board Depot, Churchfields Road, Beckenham, for the following:

*“Full application for the temporary (5 years) change of use from SUI Generis formed of an electricity undertaker’s depot to a dual use of Class B8 (to provide a scaffolding equipment storage/distribution year) and SUI Generis retaining the existing electricity undertaker’s depot.”*

- 1.2 The application was supported by a Transport Statement issued to London Borough of Bromley (LBB) who provided highways comments in May 2024. SLR provided additional details following consultation with LBB via a Transport Letter submitted in August 2024, however, LBB were not satisfied that the proposals could be accommodated without detriment and subsequently refused the application citing the following reason:

*“The proposal as set out in the application and currently in operation represents a significantly more intensive use of the site which has a detrimental impact on the general residential amenities of the area, resulting in additional noise and disturbance associated with the comings and goings to and from the site, as well as the activities upon the site itself, and insufficient information has been provided to demonstrate that the impact of the use on the residential amenities of the area and with regards to highways safety could be successfully mitigated and controlled. The proposal is thereby contrary to Policies 32, 37 and 119 of the Bromley Local Plan and Policies D3 and D14 of the London Plan.”*

- 1.3 This Technical Note has therefore been prepared to demonstrate how the proposals could be accommodated without detriment to the surrounding area.

### 2.0 Submission and Response Details

- 2.1 This section summarises the various submissions made to LBB alongside the response received from relevant Officers prior to the issue of the Decision Notice and Delegated Decision Report.

## Transport Statement (March 2024)

- 2.2 The planning application was supported by a Transport Statement which made the following key observations:
- The lawful use of the site comprises an electricity undertaker's depot (SUI Generis) and a vehicle service repair / MOT testing station (B2/B8), notably the scaffolding yard would fall within the non-designated industrial site uses.
  - The site is well located to encourage trips to be completed by public transport, this was reinforced by Census data for the local area showing some 30% of journeys to this part of Bromley for work purposes are completed by bus and rail.
  - A total of 17 staff would be expected to be employed at the site with 7 on-site staff and 10 off-site staff, resulting in 9 daily staff vehicle trips.
  - A total of 10 operational vehicles would operate from the site, typically with each vehicle allocated to a single job per day resulting in a maximum of 20 two-way daily operational movements.

## Highway Response (May 2024)

- 2.3 LBB Highways provided a response to the Transport Statement which concluded that the trip attracting potential of the development would not be significant and subsequently raised no objection, subject to conditions. The response from LBB Highways is included at **Appendix A**.

## Additional Details (August 2024)

- 2.4 Further to third party comments, the LBB Planning Officer requested additional details relating to the potential effects of vehicle activity on the local network. A summary of the findings of the additional submission materials is provided below.
- 2.5 A review of expected trip generation showed 15 two-way vehicle movements during peak periods of 0700-0800 and 1600-1700. These would comprise 5 arrivals and 10 departures in the morning, and 10 arrivals with 5 departures in the evening. Noting comments related to queueing and the interaction between the scaffolding site and the recycling centre, it is expected that these trips would be unlikely to align with the vast majority of people would not be making a trip to such a facility to discard waste.
- 2.6 To further assess the likely interaction with the recycling centre and the potential for queueing, a review of similar recycling sites in the TRICS database was undertaken demonstrating 3 two-way vehicle trips during the period of 0700-0800 and 20 two-way vehicle trips between 1600-1700. Whilst there are more arrivals in the evening, these are equivalent to just one movement per recycling bay. It is therefore considered highly unlikely that any queues would form along the site access road at the time when vehicular activity with Mason Scaffolding would reach its peak.
- 2.7 Notwithstanding this, screenshots were obtained from the LBB operated cameras at the entrance to the recycling centre, showing there are typically no static queues with three out of the four days assessed showing a clear road. However, it is accepted that there is one day when queues were observed. It is relevant to note, the access road that runs adjacent to the Recycling centre provides a legal right of way at all times to the application site and therefore



the queuing generated by Recycling Centre that has been recorded should not be taking place. In addition, with effective management the queuing traffic could easily be addressed, for example through the Recycling Centre operating a booking system, like is standard practice at other such facilities, and as was the case here during the Covid-19 pandemic.

- 2.8 Alongside the above concerns were raised regarding highway safety, however, a review of CrashMap data demonstrated that there had been no recorded incidents in the most recent 5-year period available.
- 2.9 On the basis of the above, it was concluded that the proposals could be accommodated without detriment to the operation or safety of the surrounding highway network. Notably, this conclusion was consistent with the response provided previously by LBB Highways.

## 3.0 Delegated Decision Report

### LLB Comments

- 3.1 As outlined previously, LBB Highways provided a response to the Transport Statement which concluded that the trip attracting potential of the development would not be significant and subsequently raised no objection, subject to conditions. Notwithstanding the above, in the Delegated Decision Report LBB have referred to transport elements which are considered below. The Delegated Decision Report is included at **Appendix B**.
- 3.2 LBB note that vehicles associated with the scaffolding site have been observed to arrive and depart during peak periods, either when vehicles are queueing for the recycling centre or during school drop off / pick up periods. With regard to the interaction with vehicles associated with the recycling centre, a booking system has now been implemented due to the closure of the Waldo Road recycling facility. Subsequently LLB believe that slots will be fully booked during the opening hours of:
- Monday to Friday 0700-1730
  - Saturday 0730-1600
  - Sunday 0800-1300
- 3.3 In terms of managing conflict with school drop off / pick up, the Applicant is willing for a suitably worded planning condition to be imposed to prohibit operational trips (HGV movements) between 15:15 and 15:45. This broadly aligns with a condition previously suggested by LBB Highways.
- 3.4 It is therefore considered that the comments relating to site movements during peak periods have been suitably addressed.

### Local Residents

- 3.5 Local residents were notified of the application and provided a range of comments relating to highways matters which were summarised in the Delegated Decision Notice and are outlined below.



**Table 3.1 – Response to Resident Comments**

Resident Comments	Response
Traffic levels are high along Churchfield Road at weekends because of the recycling centre.	The recycling centre has implemented a booking system which should alleviate this issue. Additionally, there will be no vehicle trips associated with the site on a Sunday.
Queueing on Churchfield Road of vehicles waiting to access the recycling centre.	
Concerns over manoeuvring space for operational vehicles.	Given that the site is already operational and the lack of recorded traffic collisions, it is evident that vehicles can manoeuvre safely.
The access is not suitable for the scaffolding vehicles, left turn arrivals would have to be on the wrong side of the road.	
Proximity of the site to the school with no crossing patrol and congestion at school pick up / drop off times.	The Applicant is willing for a condition (as suggested by LBB Highways) to be included to avoid trips during these times.
Lack of evidence of the trip generation of the site.	The trip generation has been informed by the Occupier based on the existing operations at the site.
The hours shown in the TS do not include school pick up times.	Noted and addressed below.
Lack of details of likely vehicles using the site.	Noted and addressed below.
It is expected that more staff will arrive by car with limited parking available.	There is ample parking on hard standing within the site for all vehicles, including operational vehicles.

## 4.0 Further Analysis

- 4.1 This section provides further detail to the various outstanding elements as presented in Table 3.1.

### Trip Generation

- 4.2 In assessing the trip generation of the site, consideration is also made to the trip generation of the adjacent uses to provide a full picture of the trips utilising the access with Churchfields Road in particular.

### Scaffolding Centre Trips

- 4.3 As outlined previously, this is a retrospective application and therefore the site is currently operational. As such, surveys of the existing movements associated with the scaffolding site and neighbouring recycling centre were undertaken in November 2024 covering the period of



0630-1830 across a period of 5 working days (Tuesday 19<sup>th</sup> to Monday 25<sup>th</sup>). The resulting vehicle trips associated with the scaffolding centre are summarised below in comparison with the calculated trips as previously provided.

**Table 4.1 – Scaffolding Centre Trip Generation**

Time Period	Surveyed Trips		
	Arrivals	Departures	Total
0630-0700	2	6	8
0700-0800	3	2	5
0800-0900	2	1	3
0900-1000	3	2	5
1000-1100	3	2	4
1100-1200	3	1	4
1200-1300	4	3	6
1300-1400	4	1	5
1400-1500	3	1	3
1500-1600	6	4	10
1600-1700	2	9	11
1700-1800	0	1	1
1800-1830	0	1	2
<b>0630-1830</b>	<b>34</b>	<b>33</b>	<b>67</b>

- 4.4 As demonstrated in Table 4.1, the scaffolding site generates 67 daily two-way trips. It is further shown that there are minimal trips during typical network peak hours of 0800-0900 and 1700-1800 where there would be 3 and 1 vehicle trips respectively with the former of these coinciding with expected school drop-offs. With regards to school pick-up, it is expected that this would be between 1430-1530 based on LBB Highways so taking the worst-case scenario of the busiest hour above there could be 10 two-way vehicle trips during this period.
- 4.5 Notably the trips outlined above show that, on average, the trip generation assessment presented in the Transport Statement overestimated the trips associated with the scaffolding site whereby 15 two-way trips were expected between 0700-0800 and 1600-1700. When compared with peak period trip generation from the TRICS database, the surveys show two additional vehicle movements between 0700-0800 but 9 fewer two-way vehicle trips between 1600-1700.

### Recycling Centre Trips

- 4.6 As noted above, surveys were undertaken at the site in November 2024 which recorded the number of trips associated with the recycling centre. Given that these were undertaken prior to the booking system, a comparison of the maximum potential trip generation with the booking system in place and the average weekday recorded trip generation is provided below.



**Table 4.2 – Recycling Trip Generation Comparison**

Time Period	Surveyed Trips	Maximum Trips	Net Change
0700-0800	23	72	+49
0800-0900	31	72	+41
0900-1000	53	72	+19
1000-1100	89	72	-17
1100-1200	115	72	-43
1200-1300	105	72	-33
1300-1400	108	72	-36
1400-1500	112	72	-40
1500-1600	72	72	0
1600-1700	53	72	+19
<b>0700-1700</b>	<b>762</b>	<b>720</b>	<b>-42</b>

- 4.7 As outlined above, across the full day there would be 42 fewer two-way vehicle trips based on the surveys relative to the total capacity of the centre. There could be a level of redistribution of trips, with an increase in the morning periods to account for the limited availability of slots in the middle of the day which the surveys showed to be the most popular times (1000-1500).

### **Electricity Undertaker's Depot**

- 4.8 The site is bound by an electricity undertaker's depot with the trip generation associated with this use also accounted for in the surveys. The recorded trips are shown below.

**Table 4.3 – Electricity Undertaker's Depot Trip Generation**

Time Period	Surveyed Trips		
	Arrivals	Departures	Total
0630-0700	8	1	9
0700-0800	7	8	15
0800-0900	3	8	11
0900-1000	3	4	8
1000-1100	4	2	6
1100-1200	5	4	9
1200-1300	5	2	7
1300-1400	3	2	5
1400-1500	3	3	6
1500-1600	12	10	22
1600-1700	2	9	11

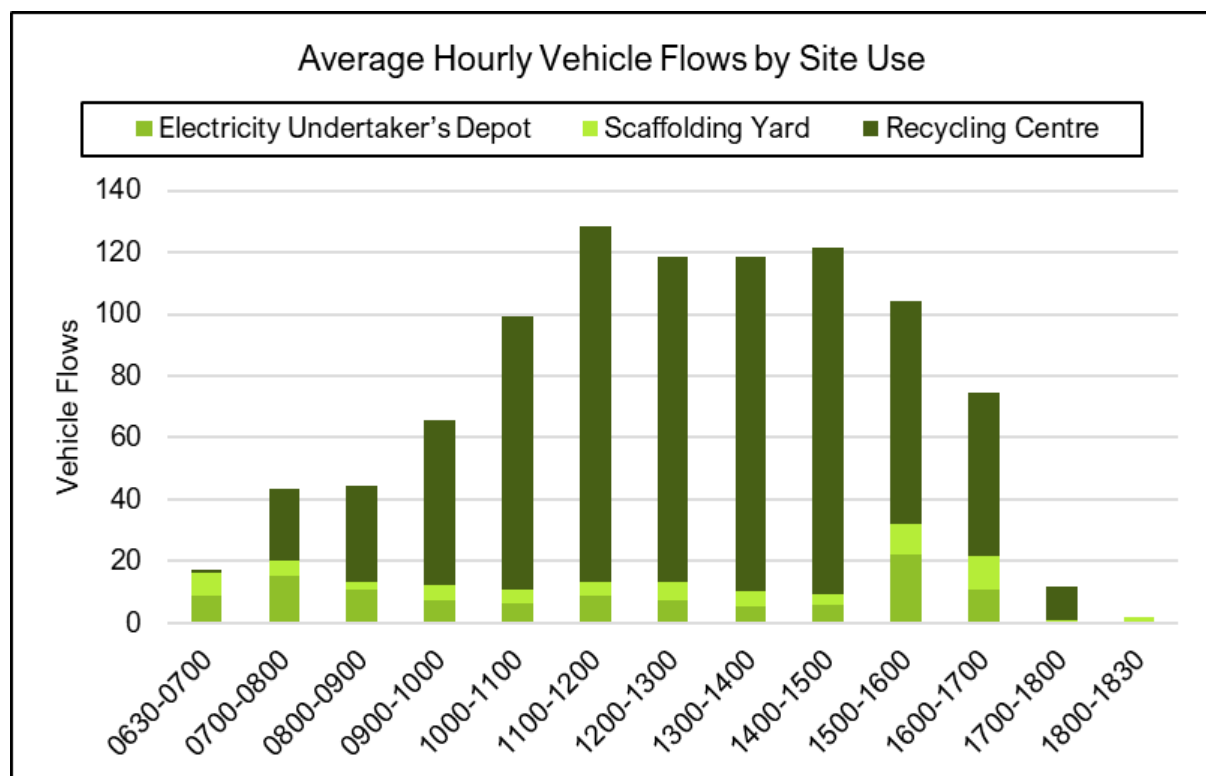


Time Period	Surveyed Trips		
	Arrivals	Departures	Total
1700-1800	0	0	0
1800-1900	0	0	0
<b>0630-1830</b>	<b>55</b>	<b>54</b>	<b>109</b>

- 4.9 As demonstrated in Table 4.3, the electricity undertaker's depot generates 109 daily two-way trips. It is shown that there are, on average, 11 trips during typical network peak hours of 0800-0900 with no trips after 1700, the former of these coincides with expected school drop-offs. With regards to school pick-up, it is expected that this would be between 1430-1530 based on LBB Highways so taking the worst-case scenario of the busiest hour above there could be 22 two-way vehicle trips during this period.

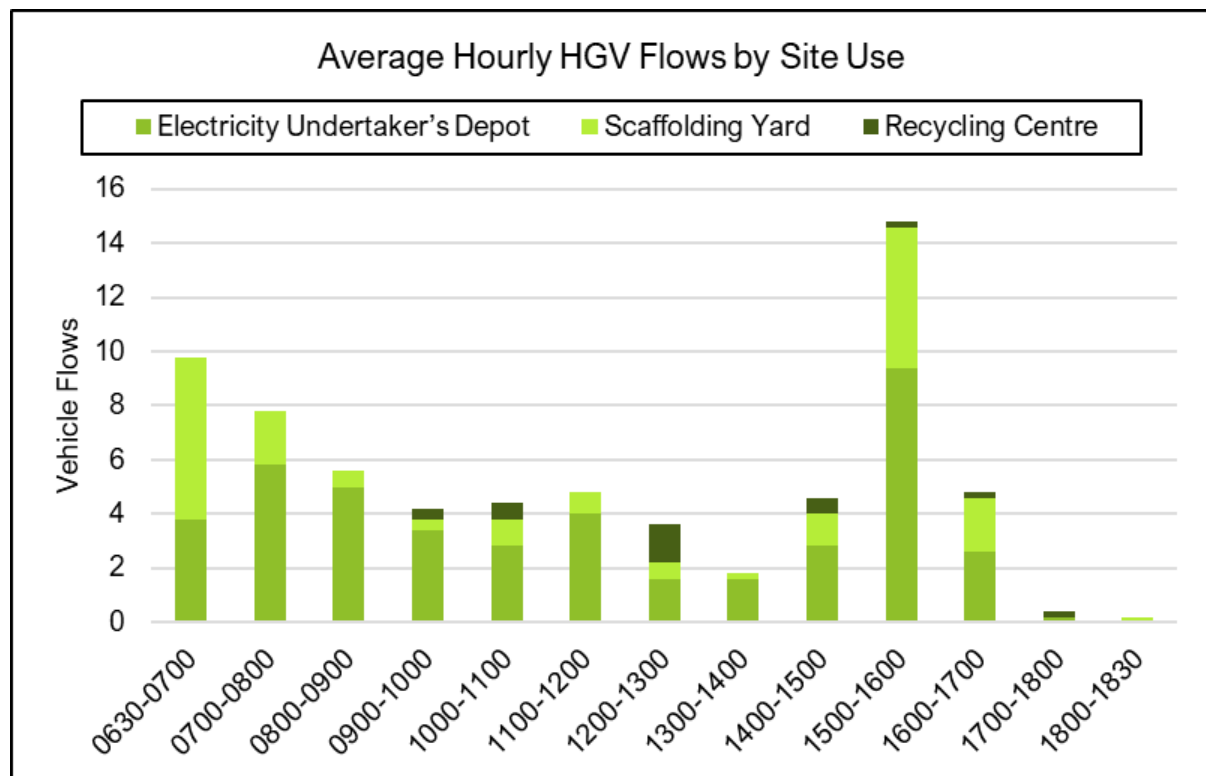
### Total Trip Summary

- 4.10 With the above trip generation review in mind, the graphs below provide a summary of the surveyed trip generation by land use for both total vehicles and HGVs. To give a full picture of vehicle activity on the access route, the trips associated with the electricity undertaker's yard have also been included.



- 4.11 It is clear from the above that the scaffolding use represents 7% of total vehicle trips utilising the access road with the recycling centre accounting for 82% and the electricity undertaker's yard accounting for the remaining 12%.





- 4.12 With regard to HGVs the scaffolding site generates 20 two-way movements across the day and, whilst higher than the number generated by the recycling centre, it is a lower than the number of HGV movements associated with the electricity undertaker's yard (43 daily). When considered as a proportion, the scaffolding site accounts for 30% of HGV movements with the recycling centre and electricity undertaker's yard accounting for 5% and 65% respectively.
- 4.13 It is therefore considered that the scaffolding centre does not have a substantial impact on the access route when considered in the context of the other site uses.

## Occasional Out of Hours Working

- 4.14 The operator of the scaffold company has confirmed that there are occasions when it is required to install scaffold over night. This is often due to local authorities requiring them to install scaffold in sensitive areas between 2200 and 0500 when interaction with the general public is minimised.
- 4.15 It is understood that on these occasions, the required vehicle(s) loaded by the yard team during their normal working hours, the build team will then arrive, get in the pre-loaded lorry, and leave the site. They then return, leave the lorry, and go home. The yard team then deal with the lorry during the day, again during their normal working hours.
- 4.16 From a transport perspective the method statement (see **Appendix C**) provided by the operator demonstrates this activity generates very few movements. As such, it does not have any material impact on the conclusions reached above with respect to the typical daily traffic assessment. It is also material to consider that the number of occasions out of hours working is required is generally limited to a couple of times per month.

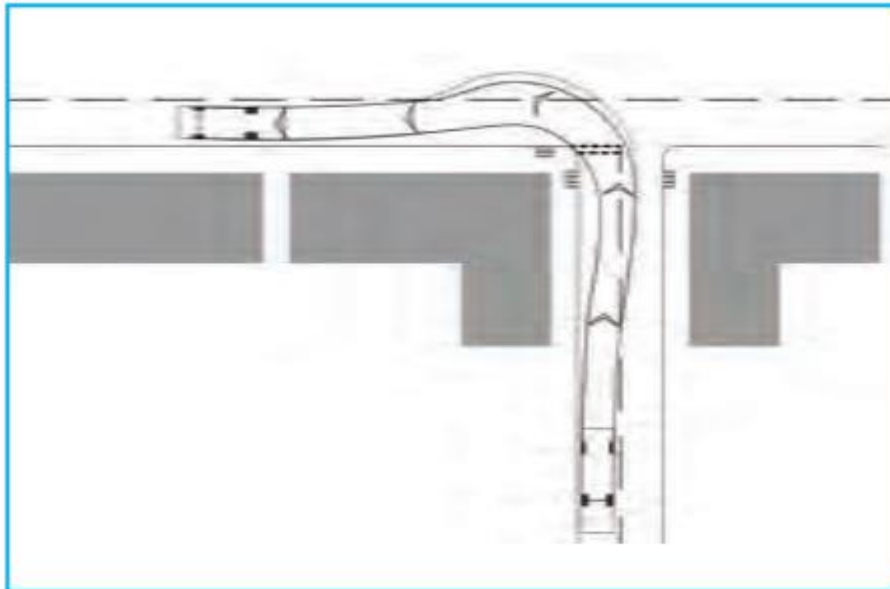




## Typical Vehicles

- 4.17 It is noted that as part of the third party responses, a query was raised regarding the types of vehicles that would typically require access to the scaffolding site and these ease with which they would be able to access the site. With this in mind, swept path analysis is attached at **Appendix D** which demonstrates how the two typical vehicles comprising an 18t Loader and 11t Rigid can access and egress the site.
- 4.18 It is demonstrated that both vehicles are able to access and egress the site. It is accepted that these manoeuvres require a reasonable amount of road space, however, it is not considered that this is in anyway an unusual occurrence. Indeed, Manual for Streets 2 makes the clear distinction that:

*9.4.11 Larger vehicles can still negotiate junctions where minimal (1m or less) corner radii are used, depending on the width of the junction arms they are turning to and from. In many cases it will be better to have slightly greater carriageway widths at the junction, rather than generous corner radii, **or accept that larger vehicles occasionally cross into the opposing lane** [SLR emphasis]. This approach allows the vehicle to take a larger radius than the junction kerb, as shown below. This can be tested by vehicle tracking software rather than relying on fixed standards.*



Despite the small corner radius, with sufficient carriageway width (X) a long vehicle can still negotiate a junction.

- 4.19 In conclusion, the movements that the relatively modest number of HGVs associated with the Appeal Scheme make are considered to be safe. It should be noted that Masons Scaffolding are FORS accredited and as such its drivers are trained to the highest standards. Given they serve the development community with building projects across the Capital they are well accustomed to navigating much more constrained locations than this and are well versed in the requirements of the Highway Code. Indeed, in recent months they have been operating a banksman at the site access junction to assist with the safe passage of its largest vehicles.



## Stage 1 Road Safety Audit

- 4.20 Policy 32 of the Bromley Local Plan sets out the exception that the Council will consider the potential impact of any development on road safety and will ensure that it is not significantly adversely affected. This is reflected within the commentary as part of the Delegated Officers Report which highlights *“from a highways perspective that on the basis of the significant concerns over the road safety implications of the operation of the use relative to the proximity of the site to the local primary school it would be reasonable to request a safety audit”*.
- 4.21 The position taken by Bromley Planning Officers is considered to be somewhat novel given that Highway Officers did not raise any cause for concern from a highway safety perspective. Equally, there is no policy requirement for a Road Safety Audit (RSA) to be undertaken of an existing junction, as is the case here. However, in the interests of assisting the Appeal process, the Appellant has commissioned an independent Stage 1 RSA of the site access.
- 4.22 The Stage 1 RSA, which was undertaken by Gateway-TSP in accordance with the requirements of GG119 of the Design Manual for Roads and Bridges, is provided at **Appendix E**. The RSA has not identified any safety concerns associated with the Churchfields Road/Site Access Road junction, having regard to the outcome of a site visit and the levels of traffic that currently use this junction inclusive of the Scaffold Yard, Recycling Centre and London Electricity Board site.
- 4.23 The outcome of the RSA corroborates the professional judgment of the Council’s highways officer and confirms that there are no safety concerns associated with either the access that serves the Appeal Scheme or types of vehicles that use it.

## Delivery and Servicing Plan

- 4.24 Notwithstanding the outcome of the technical assessments above, to assist with the determination of the scheme the Appellant is willing to provide and commit to a Delivery and Service Plan (DSP) to ensure good neighbourly development. Subject to the discharge of a suitably worded condition, this is likely to include:
- A routing plan that would require all HGVs to travel to and from the east of the Appeal Site.
  - A restriction on the maximum size of HGV able to access the site.
  - A restriction on any HGVs travelling to or from the Appeal Site between the hours of 15:15 and 15:45 to avoid school pick up times.

## 5.0 Summary and Conclusions

- 5.1 This Technical Note has been prepared to demonstrate how the retrospective proposals for use of land at the London Electricity Board Depot, Churchfields Road, could be utilised for a scaffolding yard without detriment to the surrounding area.
- 5.2 Crucially, LLB Highways have reviewed the application and concluded that the trip attracting potential of the development would not be significant and subsequently raised no objection, subject to conditions.



- 5.3 Notwithstanding the above, further details have been provided with consideration for third party responses provided to LBB. The responses received were broadly categorised into the following into trip generation and vehicle movements.
- 5.4 With regard to trip generation, it has been demonstrated that:
- The level of trips associated with the scaffolding site were overestimated in the submission material when compared with on-site surveys undertaken in November 2024.
  - Proportionally, the scaffolding site is a minor component of the trips using the access road with the vast majority linked to the recycling centre.
  - With regard to HGV movements, it is demonstrated that the scaffolding site would generate a smaller number than the existing electricity undertaker's yard.
- 5.5 Swept path analysis has demonstrated that the largest required vehicles can access and egress the site. Equally, a Stage 1 RSA has determined that the site access provides a safe environment for road users.
- 5.6 Notwithstanding the above, the Appellant is open to operating a Delivery and Servicing Management Plan (DSMP). This could be secured via a suitably worded condition, and would likely seek to control the type, routing and times HGVs are able to access the site.
- 5.7 On the basis of the evidence presented within this Technical Note, it is considered that the conclusions reached by LBB Highways are reasonable insofar as the scaffolding centre does not have a substantial impact on the access route when considered in the context of the other site uses. It is therefore concluded that the retrospective application could be accommodated without detriment to the local highway network and road safety.





## **Appendix A    LBB Highways Response**

**Application Number**  
**24/00815/FULL2**

**Planner**

**Susanna Stevenson**

**Application**

**Date 09/05/24**

**Site: London Electricity Board Depot Churchfields Road Beckenham**

**APPLICATION.**

Full application for the temporary (5 years) change of use from SUI Generis formed of an electricity undertaker's depot to a dual use of Class B8 (to provide a scaffolding equipment storage/distribution yard) and SUI Generis retaining the existing electricity undertaker's depot. Retrospective.

**Previous applications.**

**Director (E&P P) Observations**

Churchfields Road is a narrow road, and the site is located adjacent to a primary school. Furthermore, the development is in an area with PTAL rate of 3 (on a scale of 0 – 6b, where 6b is the most accessible).

Access to the site is facilitated through a shared access track with the adjacent Recycling Centre. The track, approximately 6 meters wide, connects to Churchfields Road in the north. While a pedestrian footway runs along most of its length, it does not extend into the site itself. Additionally, thermoplastic speed humps are in place to regulate vehicle speeds.

From a road safety perspective, the accident data reveals that no personal injury accidents (PIAs) have been recorded at the junction where the site access intersects with Churchfields Road. Additionally, there have been no PIAs recorded within 200 meters of the site access. This information is noteworthy because it demonstrates that the adjacent highway network section, which will be the focus of all transport activity related to the site, does not exhibit a poor safety record. Consequently, there are no design defects contributing to an unsafe environment for road users.

**Trip Generation**

Regarding staffing, the site is expected to employ a total of 7 people during working hours, which are approximately from 06:00 to 16:00. These off-site staff members will arrive at the site before their working day begins (around 07:00) and leave after 16:00 once the scaffolding-related work is completed.

Mason Scaffolding plans to operate 10 vehicles from the site. Typically, each vehicle handles one job per day, although some may remain on-site throughout the day. Consequently, the maximum worst-case daily operational vehicle movements attributed to their business are expected to be 20 (10 departures in the morning and 10 arrivals in the evening).

This level of activity is not likely to significantly impact the adjacent transport networks. Notably, it occurs outside the traditional morning and evening peak travel periods of 08:00-09:00 and 17:00-18:00. pick up times i.e., not between 8:00 and 9:00am and 2:30pm and 3:30pm. *The hours of the operation should*

*be conditioned to avoid overlapping with school drop-off and pick-up times, specifically between 8:00 and 9:00 am and 2:30 and 3:30 pm*

In conclusion- the trip attracting potential of the proposed development is not significant and will therefore not lead to a severe impact on the adjacent transport network, therefore I raise no objections to the proposal.

## **CONDITION**

OC03 (Parking)

PC17 (Construction Management Plan)

Nonstandard condition- restricting the number of onsite staff to 7 and the hours of the operation be limited to avoid overlapping with school drop-off and pick-up times, specifically between 8:00 and 9:00 am and 2:30 and 3:30 pm

Nojan Rastani  
15/05/2024



## **Appendix B    Delegated Decision Report**

**LONDON BOROUGH OF BROMLEY**  
**TOWN PLANNING**  
**RENEWAL AND RECREATION DEPARTMENT**  
  
**DELEGATED DECISION**

**24/00815/FULL2**

**Susanna**  
**Stevenson**

**London Electricity Board Depot**  
**Churchfields Road**  
**Beckenham**

**Description of Development**

Full application for the temporary (5 years) change of use from SUI Generis formed of an electricity undertaker's depot to a dual use of Class B8 (to provide a scaffolding equipment storage/distribution yard) and SUI Generis retaining the existing electricity undertaker's depot. Installation of 2 no. single storey cabins and CCTV/lighting. Retrospective. AMENDED DESCRIPTION TO INCLUDE STRUCTURES AND ADDITIONAL INFORMATION RECEIVED 27/08/24

**Proposal**

Planning permission is sought for the change of use of land from sui generis use formed of an electricity undertaker's depot to a dual use of Class B8 (to provide a scaffolding equipment storage/distribution yard) and SUI Generis retaining the existing electricity undertaker's depot. The submission states that temporary planning permission is sought, for a period of 5 years. The cover letter refers to the intended dual use of the site as an electricity undertaker's depot and vehicle service repair and MOT testing station (sui generis, existing) with the proposed Class B8 scaffolding yard use.

The proposal includes the installation on the part of the site associated with the scaffolding yard of 2 no. single storey cabins and associated development.

The application is retrospective. Part of the site has been partitioned, and the use by a scaffolding company, including storage of scaffolding equipment on racks and the installation of CCTV and amenity cabins, has already commenced.

The application has been submitted with a site location plan which edges the entirety of the electricity undertaker's yard in red, with the access road leading from Churchfields Road being edged in blue (with plan annotation stating that the blue edged access comprises an easement for vehicle and pedestrian shared access to Churchfields Road). The submitted proposed ground floor plan is coloured to denote the part of the wider site which would be used as a scaffolding storage yard this being shaded and measuring approx. 1012 sqm, with an area to the west and to the north not indicated as being for use as a scaffolding yard.

During the course of the application the scope of the proposal was revised to include development undertaken on site - the construction of 2 no. large scaffolding storage bays with roofs above and which are open-sided, as well as the siting of 2 no. single storey cabins within the demarcated scaffolding yard area (it being noted that separate



containers appear to have been positioned within the LEB land). CCTV systems and floodlighting have also been installed.

The submitted information on the application form refers to intended hours of operation as being 0600 - 1600 on Monday to Saturday, with the site accommodating the equivalent of 7 full-time employees. The Transport Statement however refers to proposed trip generation in the period 0700 - 0800 and 1600 - 1700.

The application has been submitted with the following supporting documents:

- o Covering letter
- o Flood Risk Assessment
- o Site images (CCTV)
- o Transport Statement (and subsequent Transport Letter)
- o Noise Impact Assessment (and subsequent response to comments)

#### Site location and key constraints

The application site lies to the east of the London Borough of Bromley Churchfields Road Reuse and Recycling Centre, to south of the Churchfields Recreation Ground and to the north of the Maberley Road Playing Field (each of which comprise areas of Urban Open Space). To the west of the site, beyond the nominally separate land which has been excluded from the red line site area and on the other side of the Chaffinch Brook is the site of Churchfields Primary School.

To the east of the application site is a railway line, beyond which lie the rear gardens of dwellings fronting Clockhouse Road.

The site is accessed via a two-way but reasonably narrow access road which is gated at the entrance to Churchfields Road and which serves the existing recycling centre and the LEB sui generis site.

The site lies within Flood Zone 2 and the north western boundary of it lies adjacent to the Chaffinch Brook.

#### Comments from local residents and groups

Local residents were notified of the application and a significant number of objections were submitted, in respect of the application as originally submitted and again following the submission of additional information by the applicant:

The comments received are summarised as follows:

#### Traffic, highways and highways safety

- o The traffic along Churchfields Road is already terrible at weekends because of the LBB waste/refuse site.
- o Concern over long lorries negotiating the bend in Beck Lane
- o Traffic frequently queues along the residential road and proposal will add to congestion
- o There are frequently stationary cars along Churchfields Road and overspill traffic relating to vehicles waiting to access the LBB site
- o Scaffolding lorries are large/long and there will be difficulty manoeuvring/co-existing with the stationary traffic associated with the LBB site as well as parked vehicles associated with the primary school

- o The access would be via the public access to the recycling centre which was designed for cars, evidenced by larger vehicles associated with the refuse site being via the bell-mouth junction
- o Vehicles would need to be on the wrong side of the road to turn left in the access
- o Difficulty turning right at junction of Elmers End Road and Beck Lane, and right at Churchfields Road and Beckenham Road will be compounded by additional vans/lorries needing access to the site.
- o Site is near a school which has no crossing patrol and it is unsafe to introduce more traffic onto the road
- o The road/pavement is already difficult to navigate as a pedestrian and the road is narrow
- o Will impact on the operation of the LBB recycling/waste site
- o No one to enforce the hours of use/access - increased heavy goods vehicles will threaten pedestrian safety, particularly children
- o During school pick-up and drop-off times the road is congested and difficult to navigate by car
- o Lack of evidence to corroborate assertion that the worst-case scenario would be a total of 20 vehicular trips per day (10 vehicles, each making one trip to and one trip from the site) - proposal may underestimate the number of daily traffic movements
- o Limited detail within the transport statement regarding the type of vehicles used - the statement indicates 10m long rigid trucks but 16.5m long articulated lorries have been seen accessing the site without a banksman
- o Transport statement does not explain how
- o The Transport statement states that 54% of staff will arrive by car, while acknowledging that the site has a relatively low level of public transport accessibility and no new cycle storage proposed.
- o Unfettered availability of car parking combined with poor PTAL suggests that the statement underestimates the vehicle trips by on-site employees
- o Working hours of 0600- 1600 are referred to, but the statement does not provide the expected profile of trips over the day and while the closing time may mean vehicles would avoid the 1700 - 1800 "peak" time this does not acknowledge the school pick up time (1510 - 15.30 approx)
- o Impact of congestion on the bus route - buses are frequently delayed by congestion
- o Narrow entrance of the access to the tip is unsuitable for additional large/heavy vehicles to use - large vehicles cannot always turn into the site in one go, and sometimes take several attempts
- o Information provided does not take into account the pre and after school clubs taking place at the primary school
- o Chronic traffic congestion has led to instances of vehicles mounting pavements

#### Impact on visual amenity

- o Would be an eyesore for residents

#### Noise, disturbance and pollution

- o Additional traffic will worsen air pollution in a residential area and where young children spend a lot of time
- o Air quality is already poor, with particulates generated by the recycling centre, and the proposal will lead to increased pollution associated with diesel fumes
- o Would be contrary to Mayor's Air Quality Neutral Action Plan

- o Idling vehicles, waiting to enter the waste site, or lorries associated with the scaffolding yard waiting having arrived before opening or during peak periods, harmful to health
- o Acoustic information does not take into account the noise associated with idling trucks relative to the early morning background noise
- o Unclear precisely how a palletised system would work and be quieter than loading/unloading by hand
- o What noise is generated by the forklift trucks?
- o Manual unloading has been observed and includes work undertaken in the evening, well outside of indicated hours of operation
- o Proposal will lead to increased noise - other than the recycling centre which itself should be in a commercial/industrial area, the surroundings are largely residential and comprise a quiet neighbourhood.
- o Noise generated by the site will be unacceptable within the residential area and close to houses
- o Vibration associated with heavy vehicles and deteriorating road condition
- o Noise pollution associated with scaffolding bars being loaded/unloaded - to public open spaces as well as residential dwellings
- o The use has been operating on Sunday mornings as well as other times outside of the scope of the application
- o Hours of operation are too long, and noise levels on weekends of concern

#### Other matters

- o Site is better suited for an industrial estate
- o Concern that will attract anti-social behaviour
- o Concern that the application has been submitted retrospectively
- o Environmental impact
- o Application brings no benefit to the local community
- o If permitted there would have to be stringent conditions aimed at mitigating the adverse effects of the use
- o The land could be put to better uses that would benefit the local community

Comments in support of the proposals were received and these are summarised:

- o Essential that the site remains in industrial use and is not released for housing
- o In favour of the business operating from the yard as otherwise it would be used for fly tipping

Separate comments were received from the operators of the adjacent Reuse and Recycling Centre (RRC)/London Borough of Bromley which are as follows:

"Churchfields Reuse and Recycling Centre (RRC) is for the use by Bromley residents to dispose of household waste materials, accessed via a private LBB owned approach road leading off Churchfields Road running to the north of the facility.

Churchfields RRC is a busy site with up to 500 visits per day by member of the public using cars, and a small number of visits by members of the public on foot. Commercial waste customers access the site from a separate entrance to the northwest of the site.

The approach road is two-way, with an entrance and an exit to the RRC within the road.

It is not un-common for the approach road to be full of vehicles waiting to enter the RRC, and this queue of traffic can, at busy times, extend out onto the public highway itself, namely Churchfields Road.

The RRC is not subject to any control of customer volumes such as a booking system or other similar measures. We do ask that residents visit our web site and make use of the site 'queue cams' which stream live CCTV from two cameras showing the junction of Churchfields Road and the approach road itself.

As officers responsible for the operations of the site in partnership with the council's service provider Veolia, we are concerned with any intensification of the use of the approach road. Any vehicles wishing to access the LEB land would be required to wait in line with any queueing traffic onto the RRC as the access track cannot accommodate more than two-way traffic. This will have the potential to increase instances of traffic building up in Churchfields Road.

It must be noted that an LBB Officer has witnessed vehicles entering the LEB site driving the wrong way down the approach road, avoiding traffic queuing for the RRC.

The developer is requested to demonstrate that a 13/18t rigid vehicle can safely enter and exit the LEB site whilst there are vehicles accessing and exiting the RRC along the approach road, and that the swept path analysis provided suggests they could not.

Members of the public entering the RRC on foot do so by using a walkway to the side of the approach road. This walkway is not barriered or kerbed and the addition of heavy goods vehicles accessing the LEB site would raise health and safety concerns with the vehicles potentially coming into conflict with pedestrians.

As highlighted in the Transport Statement submitted, this walkway does not lead all the way down to the LEB land and it is noted that 42% of the scaffold business's staff would either be travelling via public transport or as a pedestrian, all of which would require safe access to the LEB site. Currently, anyone wishing to access the yard by foot would need to cross the exit and entrance of the RRC, neither of which are marked.

The approach road to the RRC is gated at the junction with Churchfields Road which is currently opened and locked closed in line with the operating hours of the RRC as follows -

Monday to Friday 7am to 5:30pm  
Saturday 7:30am to 4pm  
Sunday 8am to 1pm

It is important that the gate is closed and locked to prevent unauthorised access to the RRC, vehicle incursion, fly-tipping of waste and potential vandalism/graffiti when the RRC is closed.

It is noted that it is proposed that the scaffolding yard within the LEB site is operational 6am to 4pm.

Churchfields RRC is provided by the Council for Bromley resident's under the EPA 1990, section 51 as follows:

- (1) It shall be the duty of each waste disposal authority to arrange —
- (b) For places to be provided at which persons resident in its area may deposit their household waste and for the disposal of waste so deposited.

(2) The arrangements made by a waste disposal authority under subsection (1) (b) above shall be such as to secure that—

(a) Each place is situated either within the area of the authority or so as to be reasonably accessible to persons resident in its area

(b) Each place is available for the deposit of waste at all reasonable times (including at least one period on the Saturday or following day of each week except a week in which the Saturday is 25th December or 1st January)

(c) Each place is available for the deposit of waste free of charge by persons resident in the area"

These comments were relayed to the agent for the application and a response provided (Transport Letter) which included the suggestion that a booking system could be introduced by LBB to better manage the impact of the RRC on the wider highway network and to be in line with the landowner (LBB) obligation to allow the owner right of way to and from its land at all times. Further comments received in response are summarised:

- o The information provided does not change the Neighbourhood Management concerns regarding the proposals.

- o It is noted that the Transport Letter recommends that LBBromley introduce a booking system. In fact, a booking system is intended to be introduced to attempt to manage the closure of the Waldo Road RRC in early 2025, as a contingency measure to manage customer volumes at the Churchfields Road RRC during the implementation of the capital works programme at the Waldo Road RRC.

- o The booking system is not being implemented in response to the applicant's use of the adjacent site

- o It is anticipated that when the booking system is brought in, slots will be fully booked during opening hours, as the operation of 2 public RRC sites is channelled into the Churchfields site. There will as a consequence be no lull in visits that is currently the case - as is referenced in the Transport Letter that notes that in the morning activity associated with the RRC is limited - with activity more likely through the middle of day and at weekends.

Comments from consultees

Drainage Officer: No comment.

UK Power Networks:

UKPN has a primary substation in the North East corner of the site, with cable and access rights over the northern section of the land in front of the primary substation. No objections to the proposal to date, although concerns have been voiced regarding the location of the scaffolding in close proximity to a live substation - all safety criteria and restrictions regarding UKPN access and cable rights and safe working around a primary substation has been provided to the leaseholder. As a company, UKPN will be monitoring the site to ensure that their access and cable rights are maintained.

Network Rail:

No objection raised. Information on Asset Protection Informatives for works in close proximity to Network Rail's Infrastructure provided.

Bromley Biodiversity Partnership:

Unclear whether there will be degradation of the biodiversity of the site. Trees may have been removed. If planning permission is granted conditions should be imposed to protect remaining trees from damage from activities on site, and replace any felled trees, to ensure no pollution to the bordering stream, lighting should avoid disturbance to bats.

Temporary nature of the planning permission sought has been referred to as exempting the development from Biodiversity Net Gain Provisions which appears to be incorrect. [NB further information provided 23/08/24 stating that the development only proposes the site cabins and scaffolding structure, sited on existing hardstanding with no ecological value. Consider that the development would meet the criteria for exemption as it does not impact a priority habitat of more than 25 square metres or 5 metres of linear habitat.]

Environment Agency:

No objection to the proposed development subject to conditions requiring an 8m separation between stored materials and the outer edge of the Chaffinch Brook and requiring contamination to be addressed if discovered during the development. An informative is recommended in relation to the need for a Flood Risk Activity Permit.

Highways Officer:

Initial comments are summarised:

Churchfields Road is a narrow road, and the site is located adjacent to a primary school. Furthermore, the development is in an area with PTAL rate of 3 (on a scale of 0 - 6b, where 6b is the most accessible). Access to the site is facilitated through a shared access track with the adjacent Recycling Centre. The track, approximately 6 meters wide, connects to Churchfields Road in the north. While a pedestrian footway runs along most of its length, it does not extend into the site itself. Additionally, thermoplastic speed humps are in place to regulate vehicle speeds. From a road safety perspective, the accident data reveals that no personal injury accidents (PIAs) have been recorded at the junction where the site access intersects with Churchfields Road. Additionally, there have been no PIAs recorded within 200 meters of the site access.

Trip Generation Regarding staffing, the site is expected to employ a total of 7 people during working hours, which are approximately from 06:00 to 16:00. These off-site staff members will arrive at the site before their working day begins (around 07:00) and leave after 16:00 once the scaffolding-related work is completed. Mason Scaffolding plans to operate 10 vehicles from the site.

Typically, each vehicle handles one job per day, although some may remain on-site throughout the day. Consequently, the maximum worst-case daily operational vehicle movements attributed to their business are expected to be 20 (10 departures in the morning and 10 arrivals in the evening). This level of activity is not likely to significantly impact the adjacent transport networks. Notably, it occurs outside the traditional morning and evening peak travel periods of 08:00-09:00 and 17:00-18:00. pick up times i.e., not between 8:00 and 9:00am and 2:30pm and 3:30pm. The hours of the operation should be conditioned to avoid overlapping with school drop-off and pick-up times, specifically between 8:00 and 9:00 am and 2:30 and 3:30 pm In conclusion- the trip attracting potential of the proposed development is not significant and will therefore not lead to a severe impact on the adjacent transport network. On this basis no objections were raised in regard to the impact on the adjacent transport network. A condition was recommended in the event that planning permission was granted to limit the number of

on-site staff and the hours of operation, to avoid overlapping with the school drop-off and pick-up times.

The applicant's agent submitted a Transport Letter having had regard to the local representations received and the concerns raised regarding the transport impacts of the development (received 23rd August) and additional comments were sought, and while the content of the letter were considered reasonable in terms of the approach taken in explaining the proposed/existing situation, the highways officer expressed some doubt regarding whether a condition restricting site entry/exit between 8am and 9am and 3pm to 4pm would be capable of being applied.

The Highways Officer was also advised of the content of representations regarding the existing unauthorised use of the site and there being documentation of conflict between entrance and exit to/from the site during the peak hours referred to i.e. in relation to the adjacent school and the drop-off/pick-up times associated with it. It was confirmed that from a highways perspective that on the basis of the significant concerns over the road safety implications of the operation of the use relative to the proximity of the site to the local primary school it would be reasonable to request a safety audit, and it was also confirmed that the highways site visit was undertaken outside of the specific hours of particular concern to local residents.

#### Environmental Health (Pollution):

Initial comments requested the submission of additional information/feedback regarding:

- o the location of where the storage and loading of scaffolding would be undertaken,
- o the inclusion of neighbouring gardens in the noise assessment,
- o whether the company was operational during the unattended monitoring period,
- o what the background noise level between 6am and 8am along Clock House Road was,
- o what mitigation would be provided in relation to the correction for impulsivity (noting that the noise from loading activity would be likely to be clearly audible against the residual noise levels, and so a 6 dB(A) correction more reasonable
- o Lack of intermittency - the nature of loading scaffold poles onto vehicles is unlikely to be continuous, whilst vehicles might be loaded more intensely at certain times of day, they will be free to loading and unload intermittently at any time of day as demand dictates. Suggested an intermittency correction should be applied.
- o Uncertainty - further narrative is required in regards the relevance of levels measured at another scaffold site. How many vehicles an hour are loaded there? How are they loaded? How are they stored?
- o What consideration has been given to LMAX levels?
- o The assessment should consider noise from vehicles exiting the site early morning.
- o Are reversing alarms used?

Additional information was provided on 23rd August 2024 comprising a response from the acousticians report intended to address the comments/queries received from the EHO, including with regards to garden noise.

Further comments from the EHO stated:

1. In regards point 5, further detail is requested in regards the palletised loaded and unloading method, as I would need to be satisfied that such a method could be agreed as part of a noise management strategy for the site.
2. Point 9 recognises that the 32 tonne vehicle noise levels could produce LMAX impacts above WHO recommended levels at residential facades between the hours of 6 and 7am. I advise this is considered further so that the extent of the impacts are fully understood (i.e. what are the current LMAX levels compared to the proposed with development scenario)

In response, the applicant's agent provided further information by email dated 13th September, stating that the applicant had confirmed:

"The majority of our equipment is loaded in either stillages or bundles to the bed of the lorry by forklift with boards placed on top also by forklift."

"The LAFmax are 77 dB(A) @ 10 m. The vehicle locations, within the site boundary are in excess of 40 m away from the residents and therefore the vehicle noise within the site boundary would not be expected to exceed LAFmax levels. It should be noted that it is outside the scope of BS 4142 to assess noise from vehicles on roads."

Final comments from a technical Environmental Health perspective raise objections to the proposals. Significant concerns continue to be raised by officers from an environmental health perspective regarding the potential impacts from the use. It is noted (by the EHO) that these concerns are supported by the evidence supplied by neighbouring residents. It is not considered that the handling of scaffold is something that could reasonably be controlled by way of condition to avoid adverse impact to neighbouring residents, and the issue of vehicles leaving the site during noise-sensitive hours has not been addressed. It is therefore recommended that planning permission be refused.

#### Policy Context:

Section 70(2) of the Town and Country Planning Act 1990 (as amended) sets out that in considering and determining applications for planning permission the local planning authority must have regard to:

- (a) the provisions of the development plan, so far as material to the application,
- (b) any local finance considerations, so far as material to the application, and
- (c) any other material considerations.

Section 38 (6) of the Planning and Compulsory Purchase Act (2004) makes it clear that any determination under the planning acts must be made in accordance with the development plan unless material considerations indicate otherwise.

The development plan for Bromley comprises The London Plan 2021 and The Bromley Local Plan 2019. The NPPF does not change the legal status of the development plan.

The application shall be determined in accordance with the following policies:

#### London Plan

GG2 Making the best use of land

GG5 Growing a good economy

D3 Optimising site potential through the design-led approach

D11 Safety, security and resilience to emergency

D13 Agent of change

D14 Noise



E4 Land for industry, logistics and services to support London's economic function  
E7 Industrial intensification, co-location and substitution  
T3 Transport capacity, connectivity and safeguarding  
T6 Car parking  
T7 Deliveries, servicing, and construction

## Bromley Local Plan

Policy 30 Parking  
Policy 32 Road Safety  
Policy 37 Design of New Development  
Policy 83 Non-Designated Employment Land  
Policy 119 Noise Pollution  
Policy 120 Air Quality  
Policy 122 Light Pollution  
Policy 123 Sustainable Design and Construction

## Supplementary Planning Guidance

## Urban Design SPD (Bromley 2023)

## Planning History:

In 1992 planning permission was granted under reference 92/00337/FUL for the change of use from electricity undertakers depot to electricity undertakers depot and vehicle service repair and mot testing station

This grant of planning permission was subject to conditions, including that the hours of use of the site would not operate before 07.30 hours or after 17.30 hours on any day (condition 3 - imposed "in the interest of the amenities of the area") and the following:

"The servicing, testing, repairing and storing of vehicles on the application site hereby permitted shall be carried out only by London Electricity PLC" (condition 2 - imposed in order to "enable the Council to reconsider the situation in the event of a change of user in the interest of the amenities of the area").

The permission also required the cessation of the servicing, testing, repairing and storing of vehicles other than those owned by or belonging to London Electricity PLC on or before 1st May 1994, and the final condition (condition 4) required that the night trunking operation involving the use of 2 x 30 tonnes maximum length drawbar units would no longer collect or deliver to the application site outside the opening hours stipulated by condition 3.

Under reference 13/01555/PLUD a certificate of lawfulness for remediation of contaminated land and removal of waste and contaminated material was granted. The site location plan submitted with the application was consistent with that submitted with this current application, annotated to indicate the similar cut-out area to the western corner of the site as being "area within site fence line but outside of national grid's ownership."

## Planning considerations

## Land use

The pre-existing use of the site as a sui generis statutory undertaker's depot is long-established, and the planning history indicates that in 1992 planning permission was sought to expand the nature of the use to allow for the testing, repair and servicing of vehicles, with the decision making it quite clear that these additional operations on the site were to be inherently linked to the main use, these being ancillary to the main use of the site. It is unclear to what extent this ancillary use was ever implemented to any significant degree, notwithstanding that the conditions imposed on the permission cumulatively had the effect of controlling the intensity of the use of the site and preventing an unauthorised formation of a separate use for vehicle servicing, testing and repair unrelated to the main established use of the site.

In 2001 it appears that demolition work had taken place over much of the site, although some buildings were at the time still standing. Subsequent planning records indicate that the removal of rubble/detritus associated with the demolition of buildings on the site was undertaken over a long period of time, including as recently as 2013 when a lawful development certificate was granted for the "remediation of contaminated land and removal of waste and contaminated material."

Until recently therefore, the use of the site has been a sui generis use with all activities on the site related to the statutory electricity provider's function.

This application seeks the temporary (for a period of 5 years) use of the site as a Class B8 scaffolding storage yard. The application red line plan covers the entirety of the sui generis land associated with the London Electricity Board, rather than being confined to the specific area where the unauthorised B8 activities are currently operating without the benefit of planning permission. If planning permission was granted for the proposal it would be necessary either to condition the specific parts of the site to which the B8 use must be confined, or to appreciate that the effect of a grant of permission would be to allow the whole of the wider site to be used as a scaffolding storage (B8) use and sui generis statutory undertakers depot.

The application site lies within a predominantly residential area, although the site itself is acknowledged to form a long established non-residential site, as well as to be connected in terms of the main access from Churchfields Road with the nearby Borough waste site.

It is noted that the application seeks temporary planning permission, with the covering letter stating "the use will cease at the end of the temporary period and revert to the existing sui generis consent." Government guidance (Use of Planning Conditions) states in respect of temporary permissions that they may be appropriate where a "trial run" is required in order to assess the effect of development on an area, or where it is expected that planning circumstances will change in a particular way by the end of the period. It is also stated that "a temporary planning permission may also be appropriate to enable the temporary use of vacant land or buildings prior to any longer-term proposals coming forwards." It is considered rarely justifiable to grant a second temporary permission and there is no presumption that the granting of a temporary planning permission will lead to permanent planning permission.

Policy 83 of the Bromley Local Plan states that proposals for the change of use or redevelopment of non-designated sites containing Class B uses for alternative employment generating uses will "normally be allowed provided that the amenity of any nearby residential areas is not detrimentally affected." Policy E7 of the London Plan states that development proposals should proactively encourage the intensification of businesses in use classes B1c, B2 and B8 "occupying all categories of industrial land"

through, in part, the introduction of small units. Mixed-use development proposals on non-designated industrial sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should meet a range of criteria including:

E7(D) 1) "The industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access and service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements."

Policy E4 relates to "Land for industry, logistics and services to support London's economic function" and includes at E4(D) that the retention/enhancement of additional industrial capacity should be prioritised in locations that are accessible to the strategic road network, as well as/or having potential for transport of goods by rail and/or water transport.

Policy 37 of the Bromley Local Plan relates to the general design of development in includes a number of criteria that development will be expected to meet, dependent on the scope of the development applied for. It includes at Policy 37(e) that, inter alia, development should respect the amenity of occupiers of neighbouring buildings, providing healthy environments and ensuring amenities are not harmed by noise and disturbance, inadequate daylight, impact on privacy or overshadowing.

It is noted that representations have been received submitted by the adjacent Council Reuse and Recycling Centre, expressing concern at the impact of the change of use on the operation of the waste site which is a statutory provision. It has been noted that vehicles accessing the site have used the "out" lane of traffic at times when cars have been queuing to access the recycling centre. Concern is also expressed regarding the implication that the management of the public access to the recycling centre should be altered to accommodate the proposed use. While there is stated intention to introduce a booking system for the public access to the centre to attempt to manage a large increase in demand for its use predicted as a consequence of capital works to be undertaken next year to the Borough's other waste/recycling centre at Waldo Road, this is anticipated to result in a more continuous use of the access road to serve the waste site rather than to serve the purpose of managing interactions between the scaffolding vehicles and public access to the waste site.

The applicant has referred to an easement over the LBB owned access road which allows access at any time, but this is a private legal matter. It is noted that the existing sui generis use of the application site appears to have co-existed satisfactorily for a number of years, and that within the planning history of the site, where permission was granted for the introduction of servicing, testing and storage of vehicles the conditions on the permission were clearly framed to prevent an intensification of the use of the site and to avoid the use of the access road by large vehicles outside of the defined hours of operation (these being 07.30 - 17.30, as per the conditions imposed on that previous planning permission).

#### Impact on visual amenity

Policy 37 of the Bromley Local Plan relates to the general design of development and states that all development proposals will be expected to be of a high standard of design and layout.

It is not considered that the installation of the reasonably modestly-sized amenity cabins to provide staff accommodation during working hours has had a detrimental impact on the wider visual amenities of the area, taking into account the nature of the site, the significant boundary fencing and the location of the site relative to the neighbouring waste site and alongside the railway line, as well as in the context of the established use of the site and structures associated with the existing/authorised sui generis use of the site.

The scaffolding racks are significantly large and high, and are not of any particular design quality in terms of their external appearance, but are considered consistent with and legible in the context of the wider use of the site. They have been sited with significant separation to the nearest residential dwellings and taking all of this into account it is not considered that the on-site structures and associated operational development is visually harmful or detrimental to the wider visual amenities of the area.

#### Impact on residential amenity

Policy 37 of the Bromley Local Plan requires that development respect the amenity of occupiers of neighbouring buildings, providing healthy environments and ensuring they are not harmed by noise and disturbance. Policy 119 of the BLP relates to noise pollution and states that in order to minimise adverse impacts on noise sensitive receptors, proposed development likely to generate noise and or vibration will be required to be supported by a full noise/vibration assessment to identify issues and appropriate mitigation measures. Policy D14 of the London Plan states that development proposals should avoid adverse noise impacts on health and quality of life.

The main issues in the assessment of the proposal with regards to its impact on residential amenity relate to the noise and disturbance associated with the use itself, as well as the hours during which the use would be operated, and any other material impact arising from the intensity of the use of the site and the paraphernalia/associated development.

The impact of the use is not limited to the immediate surroundings of the site, but can also reasonably be considered in relation to the access point to the site, at the junction with Churchfields Road, with aspects associated with noise and disturbance extending to the comings and goings associated with the use of the site across this privately owned access road.

The applicant has stated that regards to road noise "it is outside the scope of BS 4142 to assess noise from vehicles on roads." The site is accessed via a long access road that is not part of the public highway, which terminates at the site and extends from the gated entrance onto Churchfields Road.

Local representations have been received which express considerable concern at the impact of the proposal on the residential amenities of the nearest dwellings as well as the more general impact of the use upon the character of the surrounding residential area.

While the nearest residential dwellings are sited on the opposite side of the railway line, the residential gardens of these dwellings fronting Clock House Road are sited in reasonably proximity to the open yard, and there is limited acoustic screening to the edges of the site. Concerns have been raised regarding the noise generated by the loading and unloading of the scaffolding poles and equipment from the lorries entering

the site as well as the act of storing the poles within the racking which has been constructed on the site.

The nature of the equipment involved has significant potential to give rise to loud and unpredictable noises when metal hits metal and while the operatives may attempt as far as is possible to undertake their tasks quietly, some level of disturbance is almost inevitable due to the nature of the use and the processes associated with manoeuvring the equipment around the site and on/off the lorries. The intermittent nature of the noise/disturbance alongside the hours of operation of the use (which include early hours of the morning, well before the waste/recycling centre opens as well as the hours of operation imposed on permission 92/00337/FUL and working hours on weekends) is considered likely to give rise to an unacceptable impact on residential amenity. It is noted that residents have referred to the site already being used outside of the indicated hours of operation. It would be reasonable, if permission was forthcoming, to impose a condition relating to the hours of use, but it would require confidence that the condition would not only be complied with in the first instance, but that any potential breach would be readily identified and enforced against (i.e. would be enforceable).

The submitted/proposed hours of operation are include Saturday mornings, as well as early morning operation during the week. The hours do not always coincide strictly with the general hours and the busiest periods associated with the more distantly sited (relative to the dwellings fronting Clock House Road) waste and recycling centre, which itself may be considered a noise-generating use. The railway line will also generate some degree of noise, although the open track itself provides limited acoustic screening to that side of the site.

Overall, it is considered that insufficient information has been provided to demonstrate that the impact of the proposal related to noise and disturbance would not be intrusive or harmful to residential amenity. The use of conditions to attempt to mitigate the impact have been carefully considered. However, while it may be possible to impose conditions which would limit the scope of the use and the fundamental hours of use during the week, a condition relating to noise management would not, it is considered, be sufficient to avoid instances where the noise and disturbance associated with the loading and unloading of the lorries would cause harm to neighbouring residential amenity. Similarly, while there is some information within the application on the comings and goings associated with the use and the use of the vehicular access/manoeuvres on the site, it is not sufficient to safeguard neighbouring amenity and avoid unacceptable and unneighbourly noise and disturbance.

The existing unfettered/unauthorised use of the site has generated considerable concern amongst local residents and evidence has been submitted that speaks to unsociable working practices on the site and associated disturbance to neighbouring residents, including working outside of the proposed hours of operation and also comings and goings during school pick up/drop off periods. There is considered to be a limit to the extent to which in view of the open nature of the site and the use (i.e. no acoustic mitigation associated with structures and enclosures that might lessen the impact) is capable of being adequately controlled through the use of planning conditions that would meet the tests required in the imposing of conditions on a grant of permission.

It falls to consider whether the unauthorised use results in appreciable impact over and above that which may be associated with the authorised use of the site. It is considered that in general the activities on the site associated with the electricity statutory undertaker have been of low intensity, of limited wider impact. That the sui generis use

of the site could be intensified is appreciated, but this would be associated with the existing operator and their operational requirements. It is unclear to what extent the permission which allowed the servicing, testing and storage of vehicles owned by the electricity board was ever implemented. In any case, the scope of conditions imposed upon the permission collectively sought to carefully control the sui generis use and to avoid the intensification of the use of the site which may have arisen had the site been used for more general vehicle works and storage.

It is considered that the current operation associated with the scaffolding yard has intensified the use of the site and has focused the activities associated with the scaffolding yard in an previously vacant part of the wider land.

That the proposal seeks planning permission for a temporary period is acknowledged. However, that 5 year period sought represents a considerable time during which unacceptable impacts may arise, to the detriment of nearby residential properties.

### Highways Impacts

On the basis of the information that has been submitted, the use of the access road to allow for approx. 20 additional vehicular movements a day would not on the face of it represent a significant intensification of the access road. The applicant has also stated that it is intended to avoid access/egress at busier times on Churchfields Road (particularly school pick-up and drop-off times) and that the vehicular movements associated with the use would either not conflict with the existing strategic waste site, or the waste site operation could/should be altered to introduce systems to avoid queuing cars within the shared access road.

Notwithstanding this, it appears that vehicles presently have been observed to arrive/leave during the peak periods, either when vehicles are queuing along the access track to enter the waste site, or when children are being dropped off to and picked up from school. On these occasions and in view of the size of the vehicles using the access, manoeuvrability on the highway has been compromised and within the access road, vehicles have used the opposite side of the two-way road to pass by the stationary vehicles. The size of the vehicles associated with the use are not easily manoeuvrable and the practice of multiple such vehicles arriving and leaving in convoy gives rise to congestion and potential road safety issues associated with the adjacent highway. It is noted that the waste site itself benefits from a separate access for large vehicles associated with the strategic operation of the site, with the access road used by public cars.

The Highways Officer states that theoretically the use of the access by up to 20 vehicles a day associated with the proposed use ought not to have a significant impact on the adjacent highway, and it is understood that to date there are no records indicating a poor road safety record along the road. However, such records do not record "near misses" and the siting of the access road relative to the primary school and the significant busyness of the pavement/road at drop-off and pick-up times suggests that caution should be applied to development that might give rise to an increased potential for reduction in conditions of safety within the highway. It has been recommended that a road safety audit be undertaken, although this would be complicated by the need for the activities along the street and conflict between the operative vehicles and these activities to be actively monitored, particularly at times when there is particular pressure on the pavement and street.

The application has been submitted retrospectively, and the use is currently in operation. It is not considered appropriate in this context to impose a condition requiring the submission of a detailed road safety audit. Other conditions have been considered relating to the restriction of access to and egress from the site to such times when the street/pavement is more quiet, but in terms of enforcement of such a condition it would require multiple breaches to lead to enforcement action being taken, which would be harmful to the safety and amenity of residents and street users at each point the timing condition may be breached.

#### Biodiversity Net Gain

The applicant has submitted that the development would be exempt from the general Biodiversity Gain Condition by reason of the de minimis exemption. On this basis of the application submission this appears to be accurate, and the development is exempt for the reason set out.

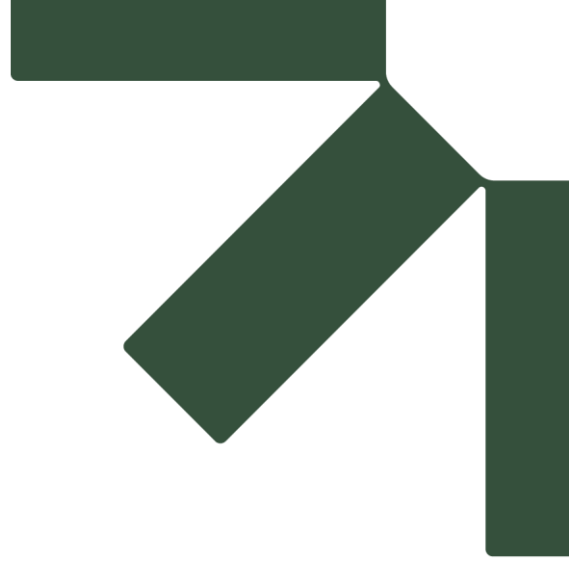
#### Conclusions

Taking the above into account it is considered that the proposal has a detrimental impact on the general character and amenity of the area, including with regards to neighbouring residential amenity, and the intensification of the use of the access road by large vehicles coming and going coincides at present with the busiest periods of use of the immediate street/pavement as a consequence of the site's location relative to the nearby primary school. Insufficient information has been provided to demonstrate that the use of the site would be acceptable in terms of road safety impact, and it is not considered that the use of conditions would be reasonably capable of mitigating the impacts of the use on pedestrians and the adjacent highway, or upon neighbouring residential amenity owing to the nature of the use in operation and the comings and goings/vehicles associated with it.

#### Decision

Application Refused

**For conditions or grounds of refusal please refer to the Decision Notice**



## Appendix C    Method Statement





## **Method Statement**

### **Out of hours HGV movement**

We confirm that some jobs require out of hours Out of hours (OOH) movements where work completed is time sensitive or presents a risk during normal working hours.

On average per month there are 2 - 3 jobs that can last 1-4 nights each. These are generally to construct gantry and public protection structures from building works. These jobs are critical to keep London moving and safe. We have highlighted two examples below:

1. We carried out protection fan at 6 More London for the safe removal of a Brie soleil. The fan was erected over a busy public footpath so needed to be carried out across 3 nights as per requirements from the building owner.
2. We constructed a gantry at Maple House Tottenham Court Road to give public protection below. Any gantry in central London, in accordance with the requirements of the LA, needs to be erected between 22.00 and 05.00.

Although the jobs may be short notice, they do not require any yard work to be undertaken outside normal operating hours. The vehicles will be loaded during working hours ready for departure, then unloaded during the next working day.

### **Typical OOH movement:**

1. Driver arrives at yard by car
2. Collects the keys from the office in a lockable cabinet
3. Visually checks and straps up his lorry and leaves to go to his place of work
4. At the end of the shift, he returns the lorry to the yard
5. Parks up and locks the keys away
6. Driver leaves the yard by car
7. The yard staff will then load or unload the lorry during the day shift.

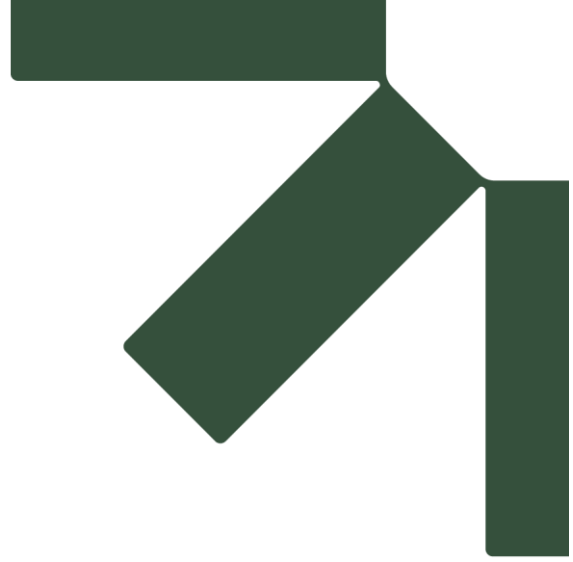
Depending on where the job is located the HGV will often leave the yard during normal working hours meaning that the only OOH movement is the return of the lorry i.e. only steps 4-7 above. Scaffolders will go straight to the place of work and do not attend the yard unless required to do so for training or other necessary management meetings. Our business employees the following staff:

- 45-60 scaffolders (this number fluctuates but 45-60 are a minimum and maximum average)
- 7 permanent yard staff
- 6 Lorry drivers
- 8 full time management
- 3 part time management

**Printed name: Neil S Garner**

**Company position: Managing Director**

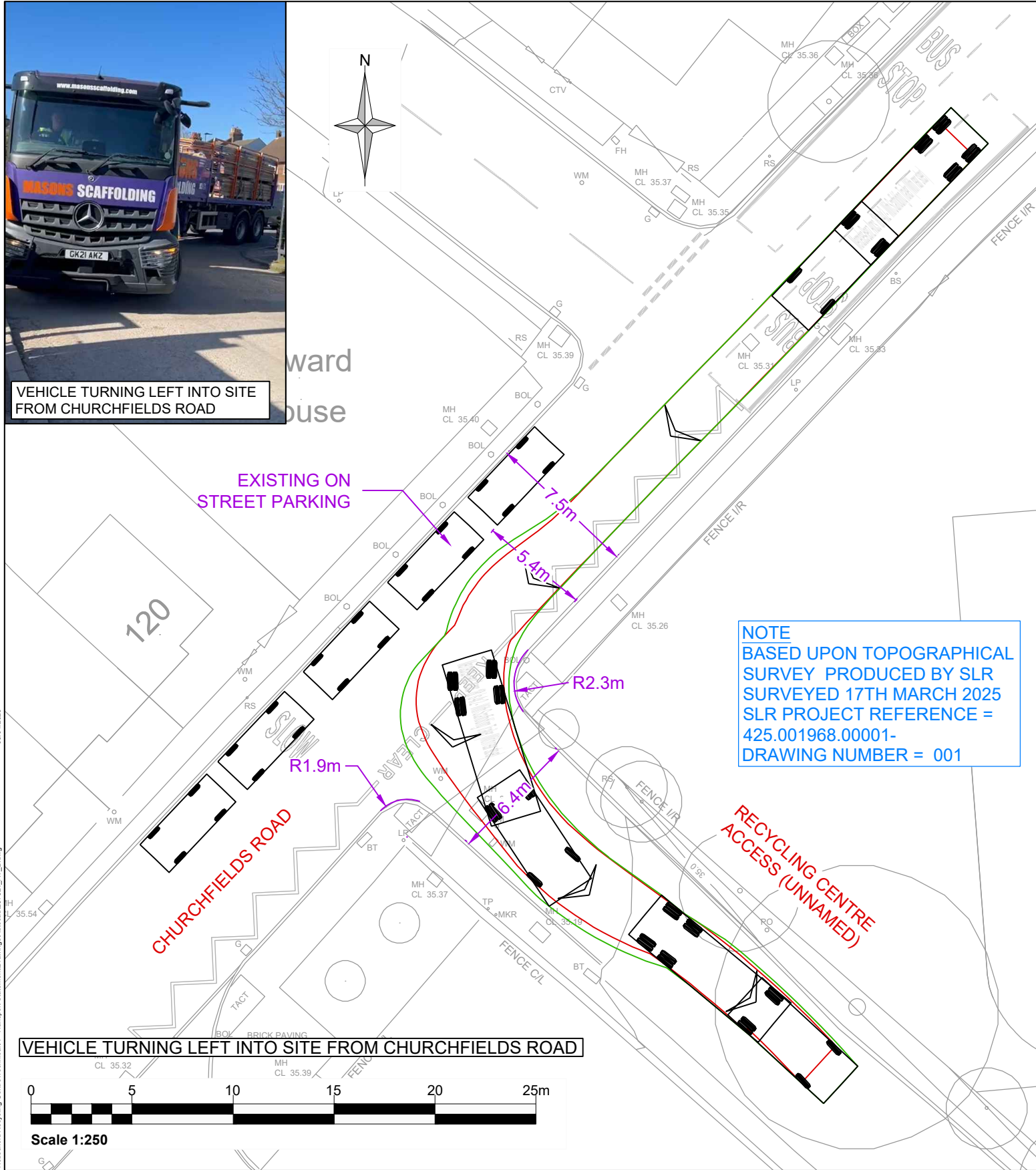
**Signature:**



## Appendix D    Swept Path Analysis




VEHICLE TURNING LEFT INTO SITE FROM CHURCHFIELDS ROAD



VEHICLE TURNING LEFT INTO SITE FROM CHURCHFIELDS ROAD



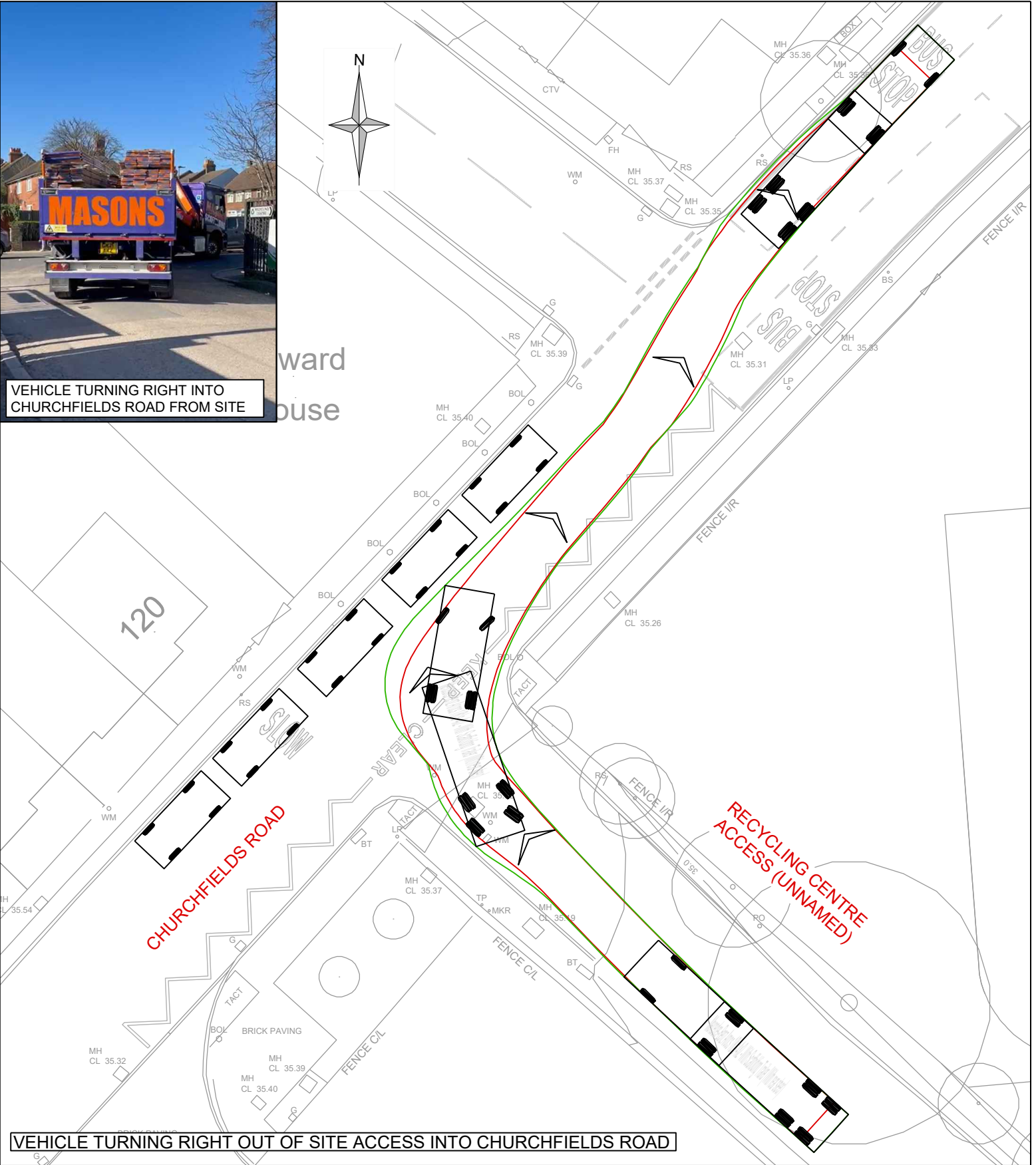
Scale 1:250

				Client Urban Provincial	
www.slrconsulting.com				Project CHURCHFIELDS ROAD HOUSEHOLD RECYCLING CENTRE	
Drawing Status & Suitability Code <b>INFORMATION</b>					
Designed SCJ	Drawn SCJ	Checked JB	Authorised N/A	Drawing Title SWEPT PATH ANALYSIS OF EXISTING RECYCLING CENTRE SITE ACCESS/EGRESS MERCEDES-BENZ AROCS 18T LS 4X2 - WITH SCAFFOLDING TRAILER	
Date 21/03/25	Date 21/03/25	Date 21/03/25	Date N/A		
Drawing Number <b>AT-D01</b>			Rev. <b>A</b>	Scale 1:250 @ A3	SLR Project No. 237324

A	ON SITE VEHICLE IMAGES SHOWN	03/04/25	SCJ	JB	N/A
Rev	Amendments	Date	By	Chk	Auth

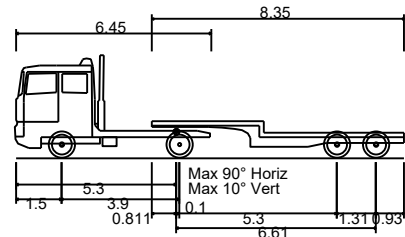


VEHICLE TURNING RIGHT INTO CHURCHFIELDS ROAD FROM SITE



VEHICLE TURNING RIGHT OUT OF SITE ACCESS INTO CHURCHFIELDS ROAD

#### VEHICLE DETAIL



MERCEDES-BENZ AROCS 18T LS 4X2 - WITH SCAFFOLDING TRAILER (REAR STEER)

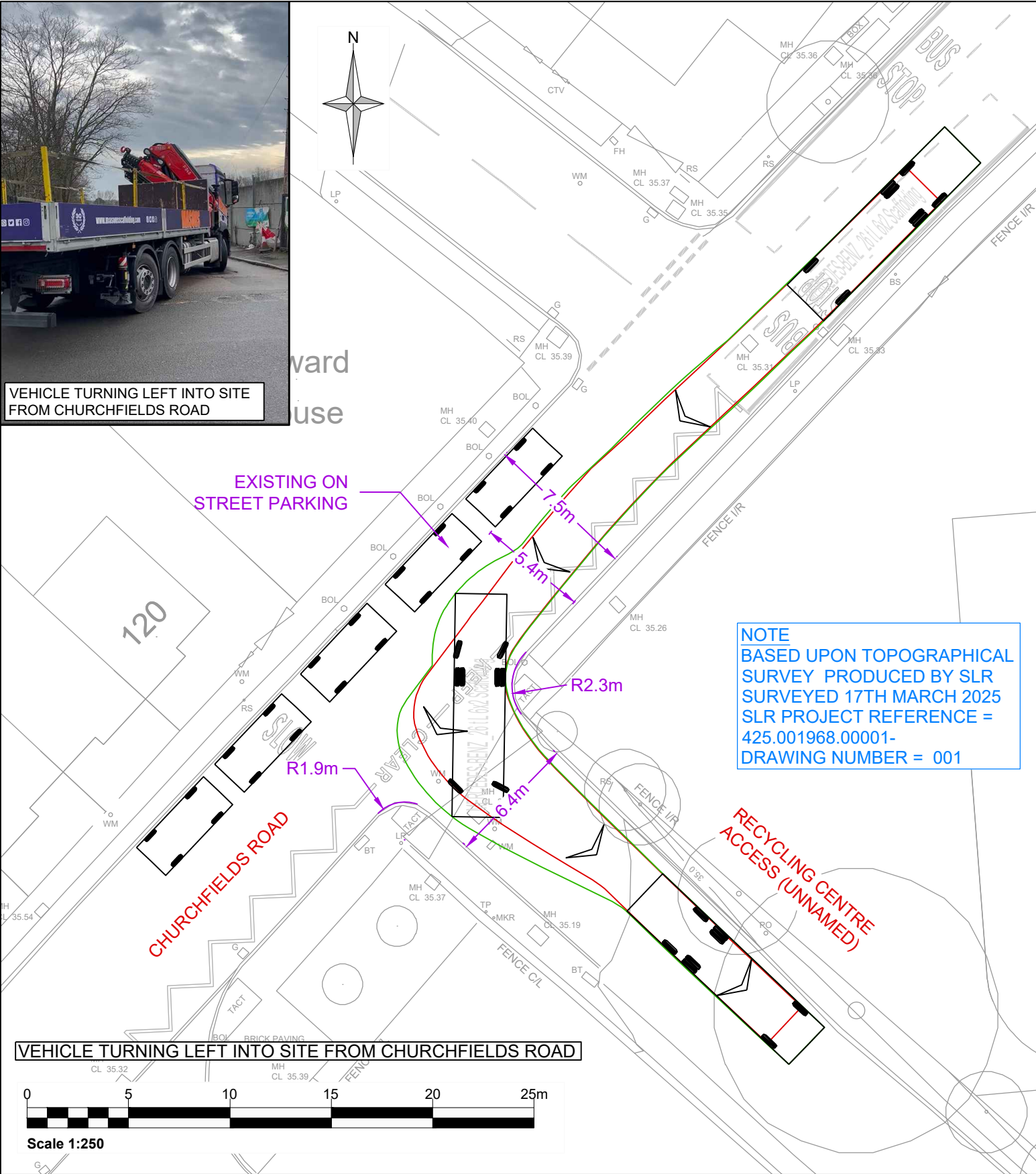
OVERALL LENGTH	12.840m
OVERALL WIDTH	2.540m
OVERALL BODY HEIGHT	3.408m
MIN BODY GROUND CLEARANCE	0.332m
MAX TRACK WIDTH	2.520m
LOCK TO LOCK TIME	6.00s
KERB TO KERB TURNING RADIUS	6.350m

THE VEHICLE IS A CUSTOM DESIGN, DEVELOPED USING DATA FROM DRAWING INFORMATION: MASONS F215A.0.25 MERCEDES AROCS UNIT MONTRACON N128120 & MERCEDES TECHNICAL SPECIFICATIONS. ASSUMPTIONS HAVE BEEN MADE WHERE SPECIFIC VEHICLE DETAILS ARE UNAVAILABLE, USING SIMILAR TYPE VEHICLES FOR REFERENCE.

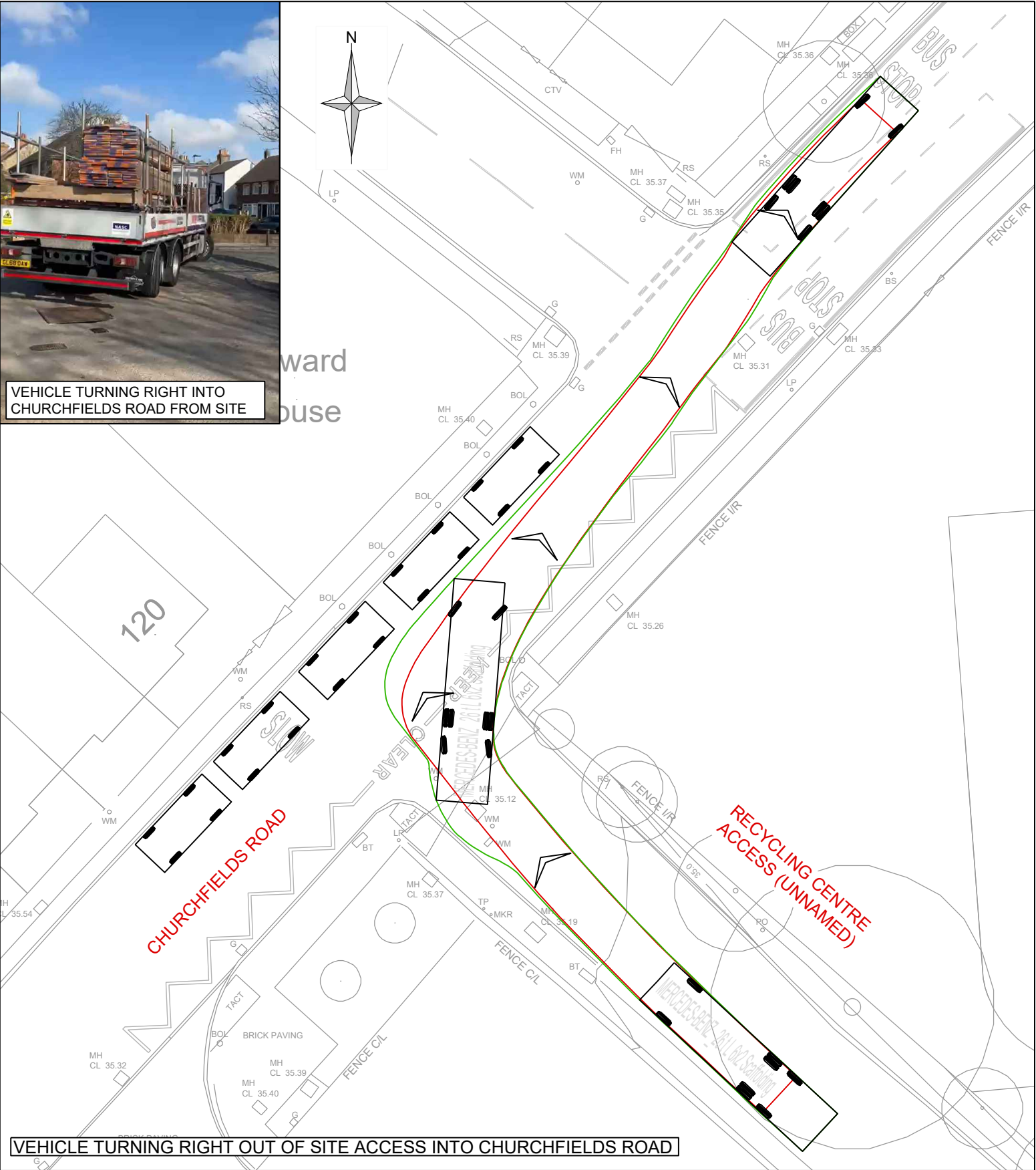




VEHICLE TURNING LEFT INTO SITE FROM CHURCHFIELDS ROAD



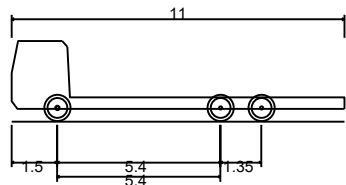
VEHICLE TURNING RIGHT INTO CHURCHFIELDS ROAD FROM SITE



				Client Urban Provincial	
www.slrconsulting.com				Project CHURCHFIELDS ROAD HOUSEHOLD RECYCLING CENTRE	
Drawing Status & Suitability Code				Drawing Title SWEPT PATH ANALYSIS OF EXISTING RECYCLING CENTRE SITE ACCESS/EGRESS MERCEDES-BENZ 26 T L 6X2 RIGID SCAFFOLDING VEHICLE	
INFORMATION					
Designed SCJ	Drawn SCJ	Checked JB	Authorised N/A		
Date 21/03/25	Date 21/03/25	Date 21/03/25	Date N/A		
Drawing Number AT-D02			Rev. A	Scale 1:250 @ A3	SLR Project No. 237324

A	ON SITE VEHICLE IMAGES SHOWN	03/04/25	SCJ	JB	N/A
Rev	Amendments	Date	By	Chk	Auth

#### VEHICLE DETAIL



MERCEDES-BENZ 26 T L 6X2 RIGID SCAFFOLDING VEHICLE (REAR STEER)	
OVERALL LENGTH	11.000m
OVERALL WIDTH	2.530m
OVERALL BODY HEIGHT	2.656m
MIN BODY GROUND CLEARANCE	0.422m
TRACK WIDTH	2.470m
LOCK TO LOCK TIME	4.00s
KERB TO KERB TURNING RADIUS	7.500m

THE VEHICLE IS A CUSTOM DESIGN, DEVELOPED BASED ON DRAWING INFORMATION FROM MASONS SCAFFOLDING F345B.2.27 AND MERCEDES TECHNICAL SPECIFICATIONS. ASSUMPTIONS HAVE BEEN MADE WHERE SPECIFIC VEHICLE DETAILS ARE UNAVAILABLE, USING SIMILAR TYPE VEHICLES FOR REFERENCE.



## **Appendix E   Road Safety Audit**

CHURCHFIELDS DEPOT, CHURCHFIELDS ROAD,  
BECKENHAM

Existing Site Access onto Churchfields Road

Stage 1 Road Safety Audit  
Overseeing Organisation: London Borough of Bromley

March 2025



*Road Safety Engineering*

Project: Churchfields Depot, Churchfields Road, Beckenham  
Existing Site Access onto Churchfields Road

Document: Stage 1 Road Safety Audit

Design Organisation: SLR Consulting

Overseeing Organisation: London Borough of Bromley

Client: SLR Consulting

Gateway RSE ref: SG/WP/2503-07 RSA1 v1.1

Issue date: 24/3/2025

Status: Issued as v1.1

Authorised by: SG

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## CONTENTS

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2	Problems Identified by this Road Safety Audit .....	3
3	Audit Team Statement .....	4

## Appendices

Appendix A:	Items Considered by this RSA
Appendix B:	Location Plan(s)

## 1 INTRODUCTION

- 1.1 This report describes a Stage 1 Road Safety Audit (RSA) of an existing private site access at Churchfields Road, Beckenham, within the London Borough of Bromley. The audit brief was provided by James Bancroft of SLR Consulting on 11<sup>th</sup> March 2025.
- 1.2 Churchfields Road is a 2-lane single carriageway road running broadly southwest to northeast. It is lit with footways running along both sides and is subject to a 30mph speed limit (20mph when school flashing amber signals are active). The local highway environment is further regulated in the form of school ‘keep clear’ markings, bus stops, traffic calming (narrowing/raised table), and a semi-box junction at Clement Road.
- 1.3 The site access road is about six metres wide and its junction with Churchfields Road benefits from an uncontrolled pedestrian crossing with dropped kerbs and tactile paving. It also has a footway running along the southwest side, becoming a virtual footway approximately 12 metres from Churchfields Road. In addition to the Council’s Reuse and Recycling Centre, the site accommodates an electricity undertaker’s yard and a Mason Scaffolding storage yard, both to the rear. Thermoplastic speed humps along the access road limit vehicle speeds.
- 1.4 Operational recycling vehicles, including refuse trucks and staff cars, enter and leave the site via a separate barrier-controlled and gated access 25 metres to the southwest.
- 1.5 The Audit Team understands that the recycling centre is open between 07:00 and 17:30 on weekdays, with slightly reduced hours at the weekend. Outside of those times the gates at the back of the public footway are closed. The Council has introduced a booking system, in which residents are allocated a 15-minute window to visit the site. The site’s capacity is 500 residents’ trips per weekday.
- 1.6 SLR Consulting has indicated that the electricity undertaker’s yard generates about 100 vehicle movements per day (including 40 HGVs), whilst Mason Scaffolding generates fewer than 70 daily movements, of which 20 are HGVs. Few of these trips occur during the conventional peak hours.
- 1.7 The recycling centre attracts 770 vehicle movements on the access road, almost all of which are light vehicles owing to the separate operational access.

- 1.8 This Road Safety Audit Team comprised Steve Giles and Wendy Palmer. The Audit consisted of a desktop study and a site visit, which was carried out between 10:45 and 11:30 on Friday 21<sup>st</sup> March 2025, when the weather was overcast and the road surfaces dry. Traffic flows, both on Churchfields Road and the site access, were moderate, and no significant congestion was observed. Some pedestrians were seen but no cyclist movements occurred. The site access was attended by up to three recycling site operatives.
- 1.9 The terms of reference for this RSA are as described in the Design Manual for Roads and Bridges (DMRB) document GG119. The Audit Team is independent of the project design team and has not advised on the site in any other capacity. The audit considers only the potential road safety implications of the existing situation and has not verified compliance with any design criteria.
- 1.10 The Audit Team has not been made aware of any Departures from Standard.
- 1.11 Recommendations are aimed at addressing the identified potential road safety problems. However, there may be other acceptable ways to overcome a problem, considering wider constraints and opportunities; the Auditors would be pleased to discuss such alternative solutions as appropriate. The recommendations contained herein do not absolve the Designers of their responsibilities.

### Collision Data

- 1.12 Personal Injury Collision (PIC) information was obtained from the Crashmap database ([www.crashmap.co.uk](http://www.crashmap.co.uk)) for the latest available five-year period (2019 to 2023). It indicates that no PICs occurred at or close to the site.

### Previous Road Safety Audit(s)

- 1.13 The Audit Team is not aware of any previous RSA having been undertaken of this site access.

## **2 PROBLEMS IDENTIFIED BY THIS ROAD SAFETY AUDIT**

### **General Matters**

- 2.1 The Audit Team raises no concerns in respect of general matters.

### **Local Alignment**

- 2.2 The Audit Team raises no concerns in respect of local alignment.

### **Junctions**

- 2.3 The Audit Team raises no concerns in respect of junctions.

### **Walking, Cycling and Horse Riding**

- 2.4 The Audit Team raises no concerns in respect of walking, cycling and horse riding.

### **Road Signs, Carriageway Markings and Lighting**

- 2.5 The Audit Team raises no concerns in respect of road signs, carriageway markings and lighting.

### 3 AUDIT TEAM STATEMENT

- 3.1 We certify that this Road Safety Audit has been carried out in accordance with DMRB document GG119.

#### Audit Team Leader

Steve Giles  
BEng (Hons), IEng, FIHE, MCIHT, MICE, CMILT, MSoRSA, HE Cert Comp  
Senior Road Safety Engineer

Signed:

Date: 24/3/2025

#### Audit Team Member(s)

Wendy Palmer  
MCIHT, MSoRSA, FIHE, HE Cert Comp  
Senior Road Safety Engineer

Signed:

Date: 24/3/2025

## APPENDIX A

### Items Considered by this RSA

### Items Considered by this Road Safety Audit

Document ref.	Rev.	Originator	Title
N/A			

### Additional/background information provided to the Audit Team

- Audit Brief dated 11/3/2025 (SLR Consulting)

## APPENDIX B

### Location Plan(s)







Making Sustainability Happen