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<td>PLANNING COMMITTEE</td>
<td>June 9 2009</td>
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<td>HEAD OF DEVELOPMENT MANAGEMENT</td>
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<th>Proposal (09-CO-0045)</th>
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<td>Construction of a new access road to eventually serve a proposed waste facility for the borough to be known as &quot;The Resource Park&quot; (subject of a separate application), including closure of part of Devonshire Grove and works to Old Kent Road between Sylvan Grove and Asylum Road and at it's junction with Devon Street and Commercial Way.</td>
<td>763 OLD KENT ROAD, LONDON SE15 1JF</td>
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<th>Application Start Date</th>
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**PURPOSE**

1. To consider the above application which is for planning committee consideration due to the number of objections received, that it is council owned development, that it is referable to the Greater London Authority (GLA) and is associated with a separate planning application of strategic importance.

**RECOMMENDATION**

2. That planning permission is granted, subject to conditions and referral to the Mayor.

**BACKGROUND**

**Site location and description**

3. The application site comprises a disused warehouse/distribution centre at 763 Old Kent Road (formally owned by Phillip Morris and known as the “Phillip Morris Site”) located on the north-eastern side of Old Kent Road (A2) and immediately to the south of a former gasworks site at 709 Old Kent Road. Devonshire Grove, which is an adopted public highway, runs parallel to 763 Old Kent Road and runs along the western boundary of the application site between Old Kent Road and the former gasworks site. The petrol station (‘Jet’ Petrol Station), sited immediately to the front of the disused distribution centre and directly fronting Old Kent Road, is also within the application site boundary.

4. The immediate surrounding area is mixed in character comprising relatively modern low rise light industrial/warehouse units and large scale 'superstore' retail units interspersed with four and five storeys high Victorian and Edwardian buildings fronting Old Kent Road comprising commercial uses on the ground floor and flats above. There is a large housing estate (Tustin Estate) and Pilgrims Way Primary School to the east of the site further along Old Kent Road. On the south side of Old Kent Road, residential housing is the predominant form of land use.
Old Kent Road is a Primary Route running northwest to southeast between central London and southeast London and Kent. It forms part of the Transport for London Road Network (TLRN) for which Transport for London (TfL) is the highway authority. This strategic road carries a large volume of traffic and, as a consequence, road traffic dominates the immediate environment. Along that part of Old Kent Road within proximity to the application site the road comprises two lanes in each direction, with additional lanes to cater for turning movements. Bus lanes run in both directions for much of the immediate vicinity with red route restrictions in operation.

Two other roads within the vicinity of the application site which have their junctions onto Old Kent Road are Asylum Road and Commercial Way. Asylum Road is a local distributor road which runs south from a signalised junction with Old Kent Road to Queens Road and carries two bus routes. It is mainly residential in nature but at its northern end, at the junction with Old Kent Road, is a large retail unit (Toys R Us) and car park accessed from Asylum Road. Commercial Way is also a local distributor road running southwest from its junction with Old Kent Road to Peckham Park Road. Again, it is largely residential in nature. These roads form part of the local road network and are the responsibility of the council's highway authority.

Background to the application
The council has acquired the freehold interest of the eastern half of a former operational gasworks site sited immediately to the north of the application site, for the purposes of housing a new integrated waste management facility (IWMF). The IWMF will replace the existing waste facility located in Manor Place, off Walworth Road. In this respect, the council has entered into a Private Finance Initiative (PFI) contract with Veolia Environmental Services who, subject to obtaining planning permission, will provide and operate a new waste facility as well as handle all waste collection and disposal on behalf of the council. If planning permission is granted, the IWMF will comprise the following:
- Waste Transfer Station (WTS) and Mechanical Biological Treatment Plant (MBT) for receipt and processing of street cleansing and domestic waste collections;
- Materials Recycling Facility (MRF) for delivery of commercial card and domestic co-mingled recycling collections;
- Household Waste Reuse and Recycling Centre (HWRRC) for public access for disposal of domestic and recycling waste;
- Municipal Depot and Vehicle Maintenance Workshop Building providing parking for Heavy Goods Vehicles (HGVs) and Refuse Collection Vehicles (RCVs) and light vehicles;
- Contract Administration and Visitor Centre Facility (Resources Centre).

As part of this contract, the council has undertaken to provide all the preparatory "enabling works" prior to the construction of an IWMF by Veolia. The council was granted planning permission in September 2008 to undertake site levelling and remediation works (ref. 08-CO-0096) on the eastern half of the gasworks site in preparation for an IWMF. All the existing buildings on the site have now been cleared and the site levelling and remediation works are currently in progress. As part of these "enabling works" the council is also required to construct a new access road to the future IWMF and carry out associated works along the Old Kent Road as detailed below.

A separate planning application was submitted by Veolia Environmental Services in September 2008 for the erection of an IWMF and associated landscaping and car parking on the eastern half of the former gasworks site (ref. 08-AP-2209). In accordance with the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 an Environmental Statement accompanies the application. The application, together with the Environmental Statement, is currently
being considered and in due course will be presented to Planning Committee for determination.

As referred to above, for contractual reasons, the council will carry out all the preparatory "enabling works", including the construction of a new road to the former gasworks site, whilst Veolia Environmental Services will develop and operate a new IWMF. This has necessarily involved the submission of separate planning applications. Whilst the application for the construction of a new access road is interrelated with the main application for the waste facility, there are issues that are specific to each application. The construction of a new access road along with associated highway works along Old Kent Road will need to be considered in terms of their potential impact on existing vehicular and pedestrian movement within the locality. Matters relating to increased traffic generation will be dealt with as part of the consideration of the proposed IWMF, as it is the waste facility itself that will generate any increase in traffic and not the proposed access road and associated works along Old Kent Road.

Details of proposal

It is proposed to access the future IWMF via a split access arrangement with one way into the site and another way out of the site. The existing access to the former gasworks site, located between Murdock Street and Devon Street, is too narrow and unsuitable for the higher volume of traffic likely to be generated from an IWMF and therefore alternative access arrangements are proposed. The existing access to the gasworks site will be retained in order to provide access to the western half of the gasworks site which is outside the IWMF development site. In order to accommodate the likely additional traffic generated by an IWMF, while maintaining traffic flows along the Old Kent Road, works are also proposed along the Old Kent Road between Sylvan Grove and Asylum Road and at the junctions of the Old Kent Road with Devon Street and Commercial Way.

The design of the proposed access arrangements is based upon a projected estimate of the likely number of vehicle movements generated by the IWMF and the likely distribution of these trips on the road network. The application is accompanied by a Transport Assessment (TA) which anticipates that the proposed IWMF will generate 211,880 two-way vehicle trips per year, which on average would be expected to generate 4,074 two-way vehicle trips per week. Supplementary documents to accompany the application were submitted on the 8th May (Stage 1 Road Safety Audits - Draft Reports) and on the 13th May (Technical Note to TfL on Revised Design dated 11th March, Summary of Old Kent Road Accident Data to November 2008 and Supplementary Advice Note in Support of Application). These documents were submitted for the purposes of providing background information only and do not amend the proposed scheme in any way.

Access to the IWMF

It is proposed to access the IWMF from Devon Street, which will become one-way from Old Kent Road, and will lead to a four-arm roundabout located at the entrance to the IWMF site. This roundabout will allow the segregation of private vehicles accessing the HWRRRC from other areas of the IWMF. In order to ensure a safe traffic movement at the junction of Devon Street with the Old Kent Road, it is proposed to relocate an existing pelican crossing currently located between Devon Street and Commercial Way to a position just northwest of Devon Street. This crossing will be staggered so to reduce the traffic impact on the Old Kent Road while providing a greater opportunity for pedestrians to cross. A northwest bound right turn lane will be positioned on the approach to the junction of Devon Street and Old Kent Road to ensure that vehicles waiting to turn right into Devon Street wont delay through traffic travelling in the opposite direction. The existing right turn lane for traffic turning into
Commercial Way from Old Kent Road will be retained. A pedestrian refuge island will be positioned in Commercial Way to help pedestrian movement along the southern side of Old Kent Road. In order to construct the junction at Devon Street, it will be necessary to narrow the adjoining footway. This will result in the loss of a mature tree (London Plane) which is located on the corner of Devon Street.

14 Egress from the IWMF

It is proposed to construct a new road that will connect the IWMF to Old Kent Road which will provide the egress from the IWMF site. The proposed road will be located between 769 Old Kent Road and the Jet Petrol Station fronting Old Kent Road. In order to facilitate this new road, the building to the rear of the petrol station at 763 Old Kent Road (Phillip Morris Site) will be demolished. The new road will lead from the roundabout at the IWMF site entrance to a new signalised junction, including a pedestrian crossing, at its junction with Old Kent Road. The existing pelican crossing located to the southeast of Sylvan Grove, about 65m from the proposed egress road will be retained. The new road will be constructed to appropriate standards to accommodate HGV's and to allow adoption by the highways authority. Landscaping is proposed along the length of the new road and the footways constructed along its length will be a minimum 3m wide in order to cater for pedestrians leaving the IWMF site.

15 Due to the close proximity of the proposed egress road to the petrol station and the potential road safety risk, it is proposed that the existing access to the petrol station, which is currently accessed direct off Old Kent Road, will be closed and the petrol station will be accessed from Devonshire Grove. Egress from the petrol station will be via the proposed new egress road close to its junction with Old Kent Road.

16 As part of the proposed egress arrangement, that part of Devonshire Grove closest to the IWMF site, northeast of Devon Street, will be stopped up (i.e. removed from the public road network).

17 Both the existing northwest bound and southeast bound bus stops are within the area that would be occupied by the proposed egress road and its junction and will need to be relocated. In terms of the northwest bound bus stop, it is proposed to relocate the bus stop to a point between Asylum Road and Commercial Way. This will necessitate the removal of an existing loading bay outside 720a-722b Old Kent Road. The southeast bound bus stop will be relocated to a point east of Devon Street, which is a suitable distance away from the Asylum Road junction to prevent any reduced capacity at this junction. However, at this point there is an existing access for a car hire firm and, whilst this does not prevent the relocation of the bus stop to this point, other options may need to be considered. The final positioning of the bus stops will need to be determined by TfL as they are the highway authority for Old Kent Road. In addition, both the northwest bound and southeast bound bus lanes will need to be shortened in order to accommodate the new road junction.

18 All the proposed new and relocated pedestrian crossings (namely those provided on Sylvan Grove, Asylum Road and Devon Street) will be provided with dropped kerbs, tactile paving and tactile crossing indicators.

19 Subsequent to any grant of permission for the above proposed works, the council will need to enter into a Section 278 Agreement with the relevant highway authorities in order to carry out the proposed road works.

Planning history

20 Under application ref. 07-CO-0096 an application was submitted in June 2007 for the construction of a new access road to serve a future proposed IWMF which also
involved the demolition of the Jet Petrol Station (747-749 Old Kent Road) and the existing buildings at 763 Old Kent Road (Phillip Morris site). The application proposed a new access road to the east of Devonshire Grove (which would be closed) to form a staggered crossroads with Asylum Road. The new road would have two lanes with one in each direction to and from the proposed IWMF site separated by a median island. It would end at a new signalised junction with Old Kent Road and with a roundabout at the IWMF site end. The application has not been determined due to concerns raised by TfL over the design of the new road. In particular, that there was a lack of available space to provide the required traffic lane widths and pedestrian footways because of the existing buildings either side of the site, and the close proximity of the new road junction to Asylum Road meant that the required minimum distances between side roads at signalised staggered crossroads junctions could not be achieved. The application now under consideration seeks to address these issues and proposes an alternative form of access and egress. If planning permission is granted for this proposal then the earlier application will be withdrawn.

21 A second application (ref. 08-CO-0076) was submitted in August 2008 proposing an alternative access arrangement to a future IWMF which involved the same split access arrangement as that currently proposed with the access along Devon Street and the egress along a new road through 763 Old Kent Road (Phillip Morris site). Highway works to facilitate this access arrangement also involved the relocation of an existing pelican crossing located between Devon Street and Commercial Way to a position northwest of Devon Street, creation of a new signalised junction at the junction of the proposed egress road and Old Kent Road as well as associated changes to road markings and amendments to bus lanes and bus stops. The proposal also involved alterations to the existing access and egress from the Jet petrol station.

22 Because of the close proximity of the Devon Street junction with the junction of Commercial Way and Old Kent Road, it was considered there was the potential for conflict between vehicles queuing in the proposed right turn lane into Devon Street with vehicles turning right out of Commercial Way onto Old Kent Road or vehicles turning right from Old Kent Road into Commercial Way. Therefore it was proposed to ban right turns into and out of Commercial Way. This was proposed on the basis that the traffic making this movement would be mainly local traffic with analysis undertaken at the time indicating that the traffic would disperse across the whole local road network and therefore the impact of the displaced traffic on any one street would be relatively small.

23 The application was heard at planning committee on the 20th January 2009 where it was resolved to refuse planning permission for the following reason:

"The proposed road would result in an unacceptable impact on the environment and quality of life, would result in a loss of amenity, and have an adverse impact on traffic movement in the area owing to the diversion of traffic onto residential roads contrary to Policies 3.1 Environmental Effects, 3.2 Protection of Amenity and 5.2 Transport Impacts of the adopted Southwark Plan 2007."

The application was refused on the 12th February 2009 for the above reason, following confirmation from the Mayor that the council could determine the application.

24 At the planning committee meeting, Members were particularly concerned that much of the traffic displaced as a result of the banned right turns at the Commercial Way junction would not be local traffic, but would be through traffic which would be likely to divert onto particular residential roads resulting in an unacceptable loss of amenity to residents. Members also questioned the survey work undertaken to quantify the effect of the proposal on the local road network as well as other matters such as the siting of the proposed new road and whether any alternative access arrangements had been
adequately considered.

25 As a result of Members concerns the applicant has undertaken an origin-destination study of the area in February 2009 in order to identify whether existing vehicles accessing the local road network at specific points was through traffic or whether it was local traffic that had an origin or destination within the survey area. The results of the survey did confirm that much of the traffic that would have been diverted from Commercial Way as a result of the banned right turns would have been through traffic and that this traffic would have mostly diverted to Asylum Road. TfL also raised concerns over the banned right turns, in particular that the junction of Asylum Road with Old Kent Road would not be able to cope with the additional demand for the right turn from Old Kent Road, thus causing excessive queuing and consequent delays to all southeast bound traffic.

26 In addition the applicant has also re-examined all the other possible options to access and egress the IWMF and for the reasons set out these proved to be problematic:

- access via Sylvan Grove, Manor Grove and Penarth Street would take traffic past residential properties which would have an adverse affect on residential amenity;
- access through the existing gasworks site entrance would mean traffic having to be routed close to security sensitive gas storage and distribution facilities;
- restricting turning movements into the IWMF site which would add significantly to lorry mileage, including on residential roads;
- making alternative provision for traffic movements that would be banned as part of the refused application scheme, however physical constraints meant that allowing a right turn onto Old Kent Road at its junction with Peckham Park Road would have caused significant delay to traffic on Old Kent Road.

27 For these reasons it is believed that the only viable option is the split access arrangement as proposed under the previously refused scheme. However, in order to overcome the concerns with the banned right turn movements into and out of Commercial Way, the applicant has also carried out further detailed investigations. As a result, it has been found that it is possible to provide a lane for the right turn into Commercial Way from Old Kent Road of the same length as the existing right turn lane and provide a slightly shorter lane for northwest bound traffic turning right into Devon Street to access the IWMF. Queues of traffic in the right turn lane onto Commercial Way would therefore not lead to any additional blocking of traffic on Old Kent, which was the reason for banning the right turns.

28 The access arrangement now proposed is essentially the same as that previously proposed with the exception of the following:

- retention of all turning movements at the junction of Old Kent Road and Commercial Way;
- provision of a right turn lane for traffic into Commercial Way of the same length as that currently existing which caters for a peak measured flow of 149 PCU (Passenger Car Units - a notional translation of larger vehicles into the equivalent of cars according to the impact they have, for example a HGV is 2.3 PCU) per hour;
- a slightly shorter lane for the right turn into Devon Street which caters for a peak flow of 60 PCU per hour
- pedestrian refuge island in Commercial Way.

FACTORS FOR CONSIDERATION

Main Issues

29 The main issues in this case are:
• principle of the proposed access arrangements and associated highway works along Old Kent Road;
• traffic issues;
• impact on amenities of adjoining occupiers;
• impact on trees;
• archaeology

Planning Policy

30 The Old Kent Road forms part of the TfL road network (TLRN). The proposed access road will serve a future IWMF to be located on part of a former gasworks site which is designated in the Southwark Plan as Proposal Site 56P which is allocated for waste management facilities. The rear part of the application site (763 Old Kent Road) falls within a Strategic Preferred Industrial Location and the front part of the site (Jet Petrol Station) is within Old Kent Road Archaeological Priority Zone (APZ), with the whole of the site within an Air Quality Management Area (AQMA). The policies set out below are considered to be the most relevant for the determination of this application.

31 Southwark Plan 2007 [July]
3.1 Environmental impacts
3.2 Protection of amenity
3.6 Air quality
3.8 Waste management
3.19 Archaeology
5.2 Transport impacts

32 London Plan as consolidated with alterations 2008
3B.10 Environmental industries
3C.1 Integrating transport and development
3C.2 Matching development to transport capacity
3C.16 Road scheme proposals
4A.19 Improving air quality
4A.20 Reducing noise and enhancing soundscapes
4A.22 Spatial policies for waste management
4A.23 Criteria for the selection of sites for waste management and disposal
4B.15 Archaeology

33 Planning Policy Guidance [PPG] and Planning Policy Statements [PPS]
PPS1: Delivering Sustainable Development
PPS10: Planning for Sustainable Waste Management
PPS24: Planning and Noise
PPG13: Transport
PPG13: Archaeology and Planning

The Mayor’s Transport Strategy
The Mayor’s Waste Strategy
Transport Assessment Best Practice: Guidance Development (2006)
Accessible London: achieving an inclusive environment SPD
Planning and Access for Disabled People: a good practice guide (ODPM)
The Mayor’s Air Quality Strategy.

Consultations
34 Site notice date: 23/04/2009 Press notice date: 30/04/2009

Neighbour consultation letters sent: 24/04/2009

Case officer site visit date: 23/04/2009
The applicant informally presented the proposal to Members on the 20th May 2009.

35 **Internal Consultees**
Archeology Officer, Traffic Group, Highways Network Planning Team

36 **Statutory and Non-Statutory Consultees**
Transport for London (TfL), Greater London Authority (GLA)

37 **Neighbour consultees**
Consultation letters were sent to occupiers of the properties who were originally consulted on the previous application (08-CO-0076) as well as those who had submitted representations to that application:

1-73 Windermere Point, 1-72 Grasmere Point, Flats 1-9 Royal London Buildings Old Kent Road
Tenants Hall, Ledbury Estate, Old Kent Road
1-56 Peterchurch House, 1-56 Skenfrith House Ledbury Estate, Commercial Way
173 Commercial Way
1-49, 55, 56 Sarnfield House, Ledbury Estate, Pencair Way
The Lodge, 8, 10-18, 20-26, 28, Sandgate Street
Tustin Club, 328, Ilderton Road
Flats 21-98 Heversham House, Tustin Estate, Ilderton Road
Pilgrims Way Junior and Infant School, 1-38 Kentmere House, Tustin Estate Manor Grove
1-71 (odd), 2-56 (even) Ethnard Road
National Grid Company, 2A, 2-14, Ruby House 25-27 Ruby Street
16-18 Kent Park Industrial Estate, Ruby Street
1, 7-14 Ruby Triangle
1-21 (odd), Highway Depot Peckham Park Road
2-17 Canal Grove
1-7 (odd), 21-97(odd) Manor Grove
19-21, 28-30 Windspoint Drive
1-28 Pencraig Way
Livesey Old Peoples Home, 1-32, Units 1-40 Ullswater House, Hillbeck Close
1-29, 34 Bowness House, Tustin Estate, Hillbeck Close
KAYMET WORKS, 1-17, 2-26, 19-35 Sylvan Grove
1-6 Sylvan Terrace, Old Kent Road
5, 7, Flats 1-36 Harry Lamborn House 9, 13, Flat 1, 3, 7, 11, 37, 39, 40, 41 Grenier Apartments 18 Gervase Street
8-13 Drovers Place
2-4, Apmts A-R 6, 8-10, 12, Cypridt Day Centre 12A, 44, 63, 75, 84, 98, 98A, 100B, 14D, 16, 48, 50, 54c, 64, 65A, 66, 70, 72, 76, 78, 80B, 108, 120A Asylum Road
11, 20 Blanch Close, Asylum Road
4, 7, 8, 20, 22, 29, 72-84, 85, 101-108, 111, 147, 149, 155 North Lodge Caroline Gardens, Asylum Road
324-346 Commercial Way
1 Devonshire Grove
Milestone Court 1 Wales Close
1, 24-32 Murdock Street
Consultation replies

Traffic Group: The applicant has had discussions with council officers and TfL in order to overcome the objections that were raised at the last committee meeting. With regards to the banned right turns, further survey work has now been undertaken with regards to both traffic volumes on Old Kent Road and also an origin and destination survey has been done which covered the local roads to the south of Old Kent Road. As a result of this further work, it is now considered that the banned right turns are no longer required and that the junctions of Commercial Way and Devon Street with Old Kent Road can operate satisfactorily without them. This will mean that the existing traffic management at those junctions remain (with the exception of the proposed relocation of the existing pedestrian crossing) as they are at present, which should result in no change to current traffic arrangements or flows on the local road network. The access arrangement has also been re-visited and other options re-considered. None of the other options were suitable for a number of reasons, mainly security and residential amenity. The proposed scheme is therefore considered to be the most suitable option.

More detailed surveys have now been undertaken and the conclusion is that the proposal will have a negligible effect on the borough road network. The proposed access road and the changes to the Old Kent Road in the form of new traffic signals
and relocating existing crossing points will not in themselves generate additional traffic. In addition, none of the proposed highway works will result in existing traffic being redirected through the residential local road network and consequently there will not be any undue loss of amenity as a result of the proposal. Any additional traffic will be as a result of the IWMF, to which the access road is intended to serve. Whilst it is anticipated that any increase in traffic associated with the IWMF will be negligible, it is recommended that a sum of £500,000 should be set aside and secured through the S106 for the waste facility application towards site specific transportation which will provide for a traffic management plan, including traffic calming schemes to be implemented as mitigation against any undue increase in traffic flows along the local road network. This will be dealt with in more detail as part of the main application.

Overall, it is considered that the concerns previously raised have now been addressed and the latest proposal will not result in any negative impacts on the local road network. The proposal is therefore considered acceptable.

Archaeology: The site lies partially within the Old Kent Road APZ. It is queried whether archaeological observation of ground investigations have been undertaken for the main site area of the IWMF site as this would help inform the level of archaeological work necessary across the whole site and in the areas of the access road. In line with the recommendations for the proposed IWMF application, any site investigation works need to be monitored by an experienced archaeologist or archaeological contractor. If this work has already been done without archaeological monitoring, it will be necessary for programme of archaeological evaluation to be undertaken within the area of the proposed roadways. This programme should be attuned to the construction impacts of the road, the extent of landscaping, levelling and excavation required for their construction and other associated features such as drainage and electrical supplies for lighting.

Highways Network Planning Team: The geometry and layout of the access road is adequate. A detailed design, which should include drainage proposals, surfacing materials and other highway elements will need to be submitted for the approval of the highway authority. The alignment of the access road will necessitate the stopping up of part of Devonshire Grove and the dedication as maintainable highway, the required turning area at the end of Devonshire Grove, the new roundabout and new road leading onto Old Kent Road. It is prudent that these highway works are within the approved boundary of the development in order to allow the stopping up to be effected under Section 247 of the Town and Country Planning Act 1990. The required highway works, which must be agreed with this authority, will be the subject of an agreement under Section 278 of the Highways Act 1980.

Statutory and non-statutory consultees

Transport for London (TfL): is satisfied that an acceptable access road layout to accommodate the access and egress required to support the IWMF can be achieved. However there are a number of issues which will need to be fully resolved prior to any formal approval under the Traffic Management Act (2004).

- The safety audits raise a number of issues, including the proximity of the right turn facilities at Devon Street and Commercial Way, the proposed southeast bound bus stop being located across from the car hire access, and table 45 shows that the queuing traffic is significantly underestimated. These concerns will need to be addressed in the detailed design stage;

- Following the advice in the safety audits, it is proposed that the new egress junction with Old Kent Road is signal controlled; TfL’s preference is that this junction should be priority controlled. However, if a priority junction is definitely
discounted on safety grounds, TfL are confident that an acceptable signalised junction can be found. Further investigation is therefore required at the detailed design stage as part of the Section 278 Agreement;

- TfL do not consider the proposed relocation of the bus stops on Old Kent Road to be acceptable as they would result in the loss of interchange facilities, have potential visibility issues for vehicles exiting Commercial Way, and do not accommodate the services that use existing bus stops and travel down Asylum Road. It is TfL’s view that an alternative location of the bus stops need to be identified. Another option would be to consider additional bus stops at the northern end of Asylum Road for the P12 and P13 services. Further discussions with TfL are required regarding the relocation of these bus stops;

- A swept-path analysis is required demonstrating sufficient access for delivery vehicles up to and including the largest type of vehicle expected to use the IWMF. This can be provided at the detailed design stage;

- Access into the site for cyclists approaching from the south east is considered to be unacceptable and an alternative layout should be sought. In some locations the highway is less than 3m wide and in these locations advanced stop lines would not be suitable;

- TfL expect tactile paving and dropped kerbs to be provided at all crossings to ensure compliance with BV165 standards. All footways surrounding the site should be a minimum 2m in width to ensure compliance with policy 3C.21 Improving conditions for walking of the London Plan;

- The proposed realignment of the footway at the Devon Street/Old Kent Road junction would require the removal of a mature tree, if possible this should be avoided;

- TfL welcomes the commitment by the applicant to monitor the transport impact of the development and for any future requirement for mitigation measures in the event that the traffic generated on nearby residential roads proves unacceptable.

44 Greater London Authority (GLA): At the time of writing this report no comments have been received.

Neighbour consultees

45 Consultation responses were received from occupiers of the following properties:
- 3 Bath Close
- Apartment R, 6, 12, 67a, Asylum Road
- 29 Caroline Gardens, Asylum Road
- 7 Laburnum Close
- Sarnsfield House, Ledbury Estate, Pencraig Way
- 3 Clifton Crescent
- 4 x unknown address

46 The concerns raised are as follows:
- increase in traffic in Asylum Road and Clifton Way which are already busy roads and the extra traffic will make it difficult for pedestrians, particularly the elderly
- Asylum Road is unsuitable for heavy lorries as it is a small residential road which only small buses can pass through
- environmental impact
- the consultation makes no difference as the plans have already being decided,
premature to give permission for a road designed to serve a proposal which is still itself only 'proposed' unless the waste facility is already a 'fait accompli'.

- loss of mature tree on corner of Devon Street, it is a magnificent specimen and contributes hugely to the local landscape character, it also helps to reduce ambient noise levels with its large sound absorbing canopy and acts as a traffic pollution barrier from the main road, it would be a crime to unnecessarily get rid of it especially for the purpose of increasing the corner radius of the road for goods vehicles where an alternative arrangement for that purpose could be made

- madness to put a waste facility and any feeder roads on or off Old Kent Road the place for a waste facility is on the river - if it is needed at all - we should not be creating more waste but encouraging less packaging, more re-use of materials so the need for such sites should become less and less

- gasworks site could be used more creatively - mixed housing, sports facilities, youth centre and old peoples centre with gardens and allotments

- waste facilities are usually located far from residential areas due to the possibility of it becoming a health hazard

- air quality within the area is already poor, the trucks going in and out of the area will exacerbate the already poor air quality

- bringing waste facilities into our community will cause more congestion, make the area feel less like a community and more like a government disposal area.

[Officer comment - with the exception of the objection to the loss of a tree and prematurity of determining this application, the concerns raised relate to the impact of the IWMF and will be dealt with as part of the consideration of that application]

74 identical letters were received from occupiers of the following properties raising concerns directly in respect of this application (09-CO-0045) and in directly to the IWMF application (08-AP-2209):

- 8, 16, 33, 43, 62, 80 Kings Grove
- 12, 14D, 40-42, 48, 67, 67A, 70 Asylum Road
- 67b Lugard Road
- 3, 17 Clifton Crescent
- 69 Comus House, Congreve Street
- 45 Brayards Road
- 3, 4, 5, 6, 7, 8 11, 14, 16, 17, 21, 37, 41, 43, 87, Grenier Apartments, 18 Gervase Street
- 133 Staveley Close, Asylum Road
- 8, 43 Montpelier Road
- 36 Kentmere House, Manor Grove
- 9, 57, 61, 63, 65, 67, 69, 73, 83, 85, 91 Manor Grove
- 1 Lancaster Way
- 30 Sarnsfield House, Pencaig Way
- 48 Naylor Road
- 16A Aylesbury House, Friary Road
- 3 Peterchurch House, Commercial Way
- 340 Commercial Way
- Flat 34, Dumain Court, Opal Street
- 24 Nucroft Road
- 33 Blanch Close
- 167 Peckham Rye

The concerns relating to the access road application are set out below:

- do not consider they have been fully consulted on the proposals [both access road and waste facility], the potential impacts of these merit a public consultation meeting;
• at the planning meeting on the 20th January proposals for a similar access road were rejected on key issues - a) development would have significantly increased vehicle impact on local roads b) the lane supplying the access road was too short c) it was impossible to consider the access application separately from the waste facility development as the two are inextricably linked d) no S278 Agreement had been obtained from TfL as per the requirements of the Highways Act 1980;

• new proposals fail to resolve these issues - a) new Road Network Survey projects even higher figures for traffic impact on the local road network than previous estimates b) the lane supplying the access road is even shorter c) the council continue to deal with these proposals as separate applications d) there is no evidence that a S278 Agreement has been obtained from TfL;

• assumptions in latest proposal obscure the reality as experienced by residents in the areas affected and under the new proposal access to and from Commercial Way; access to the waste facility; new pedestrian crossing; two new bus stops with stacking buses; two opposing filter lanes with queuing traffic; increased pedestrian presence (due to new bus stops) will converge into a very short stretch of road exacerbated by an increase in traffic usage, as projected by the new traffic survey.

49 In addition the residents also raise the following concerns in relation to the waste management facility:
• plans are excessive for an area where there is already a major waste management facility
• massive increase in heavy traffic, including on critical thoroughfares not designed for HGV's or increased domestic traffic like Asylum Road, Gervase Street and Commercial Way;
• significant increase in the numbers of HGV operations (from 6am 7 days a week) which will impact on surrounding residential area
• increased estimate of 4,074 domestic vehicle trips to and from the waste facility per week
• increased pollution, posing health risks from vehicle and plant emissions
• more hostile environment for bus users, pedestrians and cyclists on all roads leading to and from Old Kent Road
• more hostile environment for local children particularly those who attend Pilgrims Way Primary and those who live on the Tustin Estate
• no explanation of how residential parking will be impacted or accommodated
• significant visual and aural impact for may homes overlooking additional traffic flows and the facility

[Officer comment - these concerns relate to the impact of the IWMF and the objections will be dealt with as part of the consideration of that application.]

50 The Astbury Road Area Residents Association (ARARA) also make the following points:
• residents live in an area where a rat run from Queens Road and Old Kent Road occurs on a daily basis and we will resist any plans to increase traffic flow in the area, if this plan goes ahead it will blight the area and make our lives a living hell by even more noise and pollution

• do not consider we have been fully consulted on the proposals, the final plans have only recently been made available and so we have not, as Cabinet Office guidance requires, been able to comment at a point where there is scope to influence the policy outcome

[Officer comment - ARARA also set out the same concerns listed in the above
51 The Grenier Apartments Resident Group also object to the proposal and their comments are summarised as follows:

- **In view of the size of the project, of which the access road is an integral part, we strongly suggest a full public inquiry should be held to explore these proposals. Taking into account the Town & Country Planning Act we believe any approval of planning given to this proposal by Southwark would not be lawful.**

- **New Road Network Survey projects even higher figures for traffic impact on the local road than previous estimates** - there is an overriding assumption that additional residential car journeys (estimate 4,070 per week) will be easily absorbed on surrounding roads. There is already significant congestion at peak times. Traffic models used to determine the impact on local residents and business remain outdated and inaccurate. Significant increases in the number of HGV traffic operations are proposed and there is no definition of the types of HGV that Veolia intend to use. Used consistently, particularly without regulation, these vehicles (oversized 8 wheel Veolia trucks) maximise Veolia's commercial operation, 'appear' to reduce traffic figures whilst rendering the areas of their operation unworkable and uninhabitable. Added to the 4,070 vehicles per week, HGV operations, regular bus routes and significant parking, Asylum Road will result in a bottleneck. Alternative routes are already heavily congested. Asylum Road is a residential road not intended for heavy traffic or commercial vehicles; the current buses struggle to negotiate it. The residential dwellings are situated in very close proximity to the road. The proposal poses a serious health and accident risk to pedestrians and to children who use a local play facility. The applicant has failed to assess the potential vibration damage and subsidence resultant from increased traffic levels on properties in the vicinity. Points raised in previous objections have not been accounted for, e.g. the new maintenance depot for East London Line, which is under construction is situated 250m from the proposed site. This will have a significant impact on the commercial and domestic traffic in the area.

*Officer comment - the projected estimate of 4,070 vehicle trips per week includes all commercial as well as domestic vehicle trips.*

- **The lane supplying the access road is even shorter under the new proposals**: Previous application proposed using a turning lane situated in the middle of Old Kent Road, which is the existing turning lane for vehicles currently travelling southeast and turning into Commercial Way, and right turns to and from Commercial Way would have been prohibited. Members considered that the banned right turns would shift traffic load onto adjacent roads and that the proposed turning lane was of insufficient length to accommodate the likely volume of traffic. The new application permits the right turns but only by splitting and sharing the current turning lane with the waste facility, thereby making the new waste facility turning half the length of the previous proposal already rejected. Under the new proposal all the works (including all access points, bus stops and crossings) will converge into a very short stretch of road exacerbated by an increase in traffic usage. Gervase Street is currently used by all vehicles as a 'cut-through' (to avoid traffic lights at the asylum Road/Old Kent Road junction) and is very narrow. This 'short-cut' will prove attractive to vehicles exiting the waste facility (less than 100m away).

- Impact on public transport - proposal underestimate potential on public transport.
They claim that local buses and trains are not under pressure, do not warrant a full review of usage and will cope with the increase in passengers as a result of the access road and waste facilities. Buses, in particular are under great strain and a significant increase in passenger numbers will exacerbate this and cause undue stress and inconvenience for local bus users. Veolia's research shows that there is significantly lower car ownership in the area than London average. This necessitates an effective and reliable public transport system. Increase in traffic will lead to further delays and increased journey times as well as increased risk to pedestrians attempting to cross Old Kent Road to access bus stops.

- **Council continue to deal with proposals as separate applications** - Council officials have said that dealing with the applications separately is disingenuous. Members at the committee meeting expressed their assertion that it was impossible to consider them separately. Its obvious that the waste facility and access road are part of the same development for without the road the plant cannot exist. The council's previous report acknowledges the inseparability of the two applications "the proposed new road will not be undertaken unless in conjunction with the proposed waste facility - these measures should be required as part of the application from the facility itself". The developments are inextricably linked and so they should be considered together. Council are clear that the building of the access road is a pre-requisite for Veolia proceeding with the project, presumably as they feel this will be a less controversial application which will bolster the case for the approval of the facility itself.

- **No evidence that a Section 278 Agreement has been obtained from TfL** - no evidence that a S278 Agreement, required by law from TfL in order for the application to be considered at the planning stage, has been secured.

- **Full and comprehensive consultation on this and the associated waste facility has still not been undertaken** - do not consider that we have been fully consulted. In the case of the access road application we have only been given 21 days to comment - far short of the standard 12 weeks required for public consultation by the Cabinet Office. Several residents did not receive notification of the consultation, despite residing in a block 100m from the proposed access road. This is unacceptable and demonstrates the scant nature of consultation undertaken. Welcome the opportunity for a full, open public meeting where we can question the council and Veolia about the proposals.

- **Conclusion** - much of Southwark has benefitted from increasing prosperity and investment, Livesey ward remains Southwark's most deprived ward. The ward does foster a varied range of communities from young to old and is a strong, well integrated community. Siting of this access road to serve an enormous and imposing waste facility will significantly impair quality of life and the area will become known as the largest DUMP in London. To grant permission for the access road will seal the fate of the ward.

52 Southwark Cyclists: request that a planning condition is attached to ensure that secure and covered bike parking spaces are provided within the site for 30% of staff. 20 racks for visitors should be placed within 30m of the site. A £0.2m S106 Agreement should go towards local walking and cycling improvements.

53 A petition with 45 signatures has been submitted in respect of this application registering a strong objection to the application.

54 Letters of support were received from occupiers of 48 and 85 Bath Close who state that they have no reason for objecting and that they agree with recycling.
PLANNING CONSIDERATIONS

Principle of development

55 The former gasworks site is identified as Proposal Site 56P in the Southwark Plan and designated for waste management facilities, and in order to facilitate the provision of a waste facility the council has contracted to undertake the necessary “enabling” works including the provision of a suitable access arrangement to serve the site. The former gasworks site, as well as the majority of this application site, is within a Preferred Industrial Location where the principle of a waste facility is considered acceptable and in accordance with policy 4A.23 of the London Plan and policy 3.8 of the Southwark Plan which require all new waste management facilities to be located within Preferred Industrial Locations.

56 The existing access to the former gasworks site is too narrow and unsuitable for the higher volume of traffic likely to be generated from the future IWMF and would have necessitated traffic being routed close to security sensitive gas storage and distribution facilities. Therefore alternative arrangements have to be provided. Other options have also been considered, however these would have involved access through residential roads which would be unacceptable. Furthermore, the option to provide a new two way lane access and egress road adjacent to Devonshire Grove (as proposed originally) was also problematic. Because of the existing adjacent buildings there was not enough space to provide the required widths of road and footways and the proximity to the junction of Asylum Road was also a concern. Taking all the options into account, it is considered that the most suitable access arrangement is that currently proposed.

57 In terms of actual road construction, the London Plan and local plan policy do not normally encourage the construction of new roads unless new roads are required to support environmental benefits or provide essential local access. The proposed access road will not in itself result in an increase in vehicular traffic and can be supported in principle as it will provide a benefit to the environment by virtue of facilitating access to a much needed waste facility and in this respect is integrated with local and strategic land use policies. Although the proposed access road is intended to serve a future waste facility, if such a facility is never built on this half of the gasworks site then the road could provide essential access to this part of the site for any alternative future uses.

58 The demolition of 763 Old Kent Road (Phillip Morris Site) does not require planning permission as the site is not used for residential use and there are no residential properties immediately adjacent to the site. In any case, no objections are raised in this respect as the site is no longer used for engineering purposes.

59 Consultation
Residents have raised concerns about the lack of consultation that has taken place, particularly at the time when the gasworks site was being considered as a possible site for a IWMF. However the land use designation of the former gasworks site has been the subject of a formal public consultation exercise which was undertaken as part of the review of the emerging Southwark Plan, which was adopted in 2007. As part of this review a public inquiry was held where the designation of the site was considered and commented on by the Planning Inspector. In addition the council has undertaken widespread consultative work since 2003 in an attempt to engage local residents and businesses in the area. This has taken the form of publishing articles in Southwark Life and adverts in the local press, distributing leaflets at local events, setting up of a Visitors Centre on the site and establishing a Community Liaison Group as well as carrying out local outreach work, including MORI research. Veolia, as applicant for the IWMF application, has also undertaken public consultation work and
the details of this are set out in the documents accompanying that application. With regards to the public consultation that has been carried out for this planning application as well as the IWMF application, in both cases site notices have been displayed, adverts placed in the local press, and letters sent out to occupiers of properties in the area. It is therefore considered that local residents and businesses have been appropriately consulted on all aspects of the proposed IWMF, including all associated planning applications, as well as the designation of the site in the Southwark Plan.

60 Separate Applications
It would be usual practice to have one planning application which covered both the proposed IWMF and the access arrangements, but in this case it has been necessary to deal with the proposal as two separate planning applications. As part of the PFI contract the council agreed to undertake all "enabling works", including the provision of an access road, whilst Veolia will construct and operate a IWMF, subject to obtaining planning permission. Therefore the responsibility of delivering various aspects of the project, including securing the relevant approvals, lies with different parties. Furthermore, in order to secure the site for the new access road it was thought that the council may have to compulsory purchase an amount of land. As compulsory purchase powers lie only with local authorities, Veolia could not legally do this and therefore the access road had to be progressed by the council. If planning permission is granted for the proposed new road then it will become public highway where it will be the responsibility of the council as highway authority and will be outside the main IWMF site where responsibility rests with Veolia. For these reasons it has been necessary to separate the two applications.

61 It is recognised that the access road application is inter-related with the application for the IWMF and indeed the IWMF site layout and expected level and nature of traffic that is likely to be generated by a future IWMF has had to inform the design of the road and associated highway works proposed. However, there are issues that are specific to each application and as such it is considered that each application can be adequately assessed on their own merits. The construction of a new road along with associated highway works along Old Kent Road will need to be considered in terms of their potential impact on existing vehicular and pedestrian movement within the locality. The matter of traffic generation and associated impacts will be assessed as part of the IWMF application as these are environmental impacts that will be directly attributable to that facility.

Environmental impact assessment

62 The proposal does not constitute either Schedule 1 or Schedule 2 development as defined by the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 and therefore an environmental statement is not required. However, the proposed IWMF is classed as Schedule 2 development in accordance with the 1999 Regulations and an environmental statement has been submitted to accompany that application. This will be assessed as part of the consideration of that application and in accordance with the relevant legislation.

Impact of proposed development on amenity of adjoining occupiers and surrounding area

63 Policy 3.2 of the Southwark Plan states that permission will not be granted for developments where they would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the area. Furthermore, policy 3.1 concerning the environmental effects of development proposals advises that permission should not be granted where a proposal would have an adverse impact on the environment and quality of life, unless any adverse effects can be avoided or mitigated against.
The scheme previously submitted was refused on the basis that it would have a detrimental impact on the environment and would result in a loss of amenity to local residents owing to the diversion of traffic onto particular residential roads. The displacement of the traffic was due to the proposed banned right turns into and out of Commercial Way at its junction with Old Kent Road. The applicant has undertaken further survey work and investigations and has found these banned turns are not required and the junctions of Commercial Way and Devon Street with Old Kent Road can operate satisfactorily without them. As such, the scheme no longer involves changes to the traffic arrangements already in place or the traffic flows on the local road network. The proposed new road and the associated highway changes along Old Kent Road, such as the new traffic signals and relocating pedestrian crossings and bus stops will not result in any of the existing traffic being diverted through the residential road network as was the case with the previous scheme. This in turn will not result in any loss of amenity to local residents.

The impact of any new traffic generation on residential roads will be considered carefully as part of the assessment of the application for the IWMF as it is the facility itself that is likely to generate an increase in traffic. Other environmental impacts such as potential noise and pollution associated with additional traffic in the area, as well as that associated with the operation of the IWMF itself will be considered also.

In terms of visual amenity the new road will have a minimal impact on adjoining occupiers, and landscaping in the form of trees, is proposed along its' length. There are other existing roads of a similar length to that proposed within the immediate vicinity (for example Sylvan Grove) which run northwards from Old Kent Road towards the former gasworks site. As such, a new road in this location is not uncharacteristic with the established street pattern.

Overall, it is considered that the proposal has overcome the previous concerns relating to residential amenity and effects on the environment and quality of life. The impact of the increased in traffic on the local road network will be assessed as part of the consideration of the IWMF.

**Traffic issues**

The proposed new road and works have been designed to accommodate the likely level of traffic generated by a future IWMF and in accordance with policy 5.2 of the Southwark Plan the application is accompanied by a TA as it is recognised that the IWMF will have transport implications. However, it is not the proposed road or changes to the traffic management along Old Kent Road that will generate any additional traffic as the proposal does not involve the widening of Old Kent Road and thereby increasing the capacity. The impact of the predicted traffic on both the TLRN as well as the local road network will be an important consideration as part of the assessment of the IWMF.

**Impact on the TLRN**

In terms of the impact of the proposed new road and associated highway works along Old Kent Road, where TfL are the highway authority for Old Kent Road, TfL have not raised any objections in principle and are satisfied that an acceptable layout can be achieved. TfL have raised a number of issues, such as the proposed relocation of the bus stops and the preference for a priority (give way) junction rather than a signal controlled new egress junction in addition to other matters including the proximity of the right turn facilities at Devon Street and Commercial Way and that the queuing traffic has been underestimated. Residents have also raised similar concerns that the right turn lane for traffic turning into Devon Street is too short. However TfL are satisfied that all of these matters can be resolved at the detailed design stage as part
Residents have expressed concern that a Section 278 Agreement has not been obtained from TfL in accordance with the Highways Act 1980. A Section 278 Agreement is necessary to secure the approval from the relevant highway authority for any road works that need to be undertaken. This is separate from the requirement of obtaining planning permission for development as defined by the Town and Country Planning Act 1990. In this respect a developer would always seek to enter into a Section 278 Agreement for the detailed design of the road works subsequent to planning permission being obtained for the actual development itself.

Signalised Junction
An option to provide a priority (give-way) junction at the end of the new egress road has been investigated by the applicant as part of the consideration of the various access and egress options and as a result of discussions with TfL. In this respect, two Stage 1 Road Safety Audits have been carried out. The first Audit analyses the impact on road safety if a priority junction was installed. The results of this Audit shows that there are likely to be conflicts caused by vehicles, including HGVs, turning out of the proposed egress road, which may result in vehicular collisions. The Audit recommends alternative traffic management. The second Safety Audit considers the impacts of a signalised junction and raises no safety concerns at the proposed egress junction. TfL has stated that a priority junction would be preferred, but if as a result of further investigations as part of the Section 278 Agreement, they are confident that a signalised junction would be acceptable.

Removal of loading bay
The proposed removal of the loading bay outside Nos. 720a-722b Old Kent Road could have an effect on local business and will increase demand for loading facilities on nearby roads other than Old Kent Road. However the properties have access to a yard area at the rear and the side access to the cellar of the public house at 720 Old Kent Road is already provided in Commercial Way. On this basis the removal of the loading bay is considered acceptable.

Relocation of bus stops
Residents refer to the fact that there will be an increased pedestrian presence as a result of new bus stops, but the proposal involves the relocation of existing bus stops (one southeast bound and one northwest bound) rather than the provision of additional stops. TfL have pointed out that the proposed location of the northwest bound stop is problematic as it would be close to the existing access point for a car hire firm. The final position of the bus stops would need to be determined by TfL in any case as they are the highway authority and they have confirmed that this matter can be dealt with at the Section 278 Agreement stage.

Impact on pedestrian movement
In order to construct the junction at Devon Street it will be necessary to narrow the footway at this point. However Old Kent Road has relatively wide footways and the resultant width is still in excess of 3m which is the recommended width for use by pedestrians. The new access road will have footways constructed to a minimum 3m width and therefore will easily be able to be used by pedestrians exiting the site including those in wheelchairs or pushing children in buggies. Pedestrian and pelican crossings will be provided at various points along this stretch of Old Kent Road and these will have the required dropped kerbs, and tactile paving and crossing indicators. It is therefore considered that overall the proposal will not have a seriously detrimental impact on pedestrian movement in the immediate locality.

Impact on cycle movement
Southwark Cyclists have requested that covered and secure cycle parking is provided
within the IWMF site. However as this relates to the main IWMF it will be considered as part of that application. TfL does consider that the access into the IWMF site approaching from the southeast is currently unacceptable and this needs to be further explored; this can be done as part of the detailed design negotiations for the Section 278 Agreement.

76 Impact on the local road network
The proposed split access arrangement will mean existing commercial properties fronting Devon Street will have to use the proposed one way system to operate their businesses. In addition the access arrangements for the petrol station will also necessitate vehicles having to egress the petrol station via the new road access which at busy times might lead to a degree of inconvenience. However it is unlikely traffic will have to queue for any significant length into and out of the IWMF site with the exception of possible times at weekends when it is anticipated that the facility will be used more extensively by private vehicles accessing the HWRRC. In addition, it will mean that the occupiers in Devon Street and vehicles using the petrol station will be able to exit onto Old Kent Road via a new signalled junction which does represent an improvement as compared with the existing situation.

77 The overriding concern of the scheme, as previously submitted, was with the right turn banned movements into and out of Commercial Way and the impact this would have on the local road network. As all the existing traffic movements at this junction are now proposed to be retained, the proposal will not result in the diversion of traffic onto other residential roads. As such the proposal will have no impact on the local residential road network as all existing traffic movements will be retained.

78 Residents are concerned that the TA projects even higher figures for the traffic impact on the local roads than previous estimates and that members had previously raised concerns about the increased vehicle impact on local roads. This current application does not propose any changes from that previously proposed, other than to amend the routing of traffic to reflect the fact that the banned right turns at Commercial Way are no longer proposed.

79 The survey work undertaken estimates that, using a worst case scenario, the IWMF could generate a maximum of 21 two-way private car trips per hour on Asylum Road and up to 26 two-way car trips on Commercial Way. Compared to existing traffic volumes on these roads, this represents an increase of 3.3%. The impact of traffic generation will be fully assessed as part of the consideration of the IWMF application, as it is the facility itself that will be the traffic generator. Whilst is anticipated that any increase in traffic on the local road network associated with the IWMF will be minimal, it will be recommended that a sum of £500,000 should be set aside and secured through a S106 for the waste facility application. This sum of monies would be towards site specific transportation which will provide for a traffic management plan, including traffic calming schemes which, if found to be necessary, could mitigate against any undue increase in traffic flows along the local road network. This will be assessed in detail as part of the consideration of the environmental impacts the IWMF application.

80 With regards to goods vehicles on the local road network, it is anticipated that peak daytime flows arising from the IWMF will be 1 two-way goods vehicle movement per hour on Asylum Road and up to 7 two-way goods vehicle movements per hour on Commercial Way. This estimate makes no allowance for the fact that many waste collection vehicles already travel on these roads to get to South East London Combined Heat and Power station (SELCHP) and Hinkcroft located about 1km to the northeast of the proposed IWMF site within Lewisham Borough. These estimates represent a 'worst case scenario'. Whilst it is not possible to place restrictions on private vehicle trips associated with the IWMF, a Travel Plan and Traffic Routing Agreement which will control goods vehicles in terms of routes and numbers will be
secured as part of the application for the IWMF, and again will be considered in detail for that application.

Impact on trees

81 The proposed realignment of the footway at the junction of Devon Street and Old Kent Road will result in the loss of a mature London Plan. The applicant's Traffic Consultant has advised that the tree is not set back sufficiently from the existing kerbline and obstructs the visibility for drivers emerging from Devon Street and as such the tree is already causing problems for drivers which would require remedial action. It is unfortunate that the proposal necessitates the loss of a tree, indeed there is normally a presumption in favour of retaining trees as they do enhance the visual amenities of the area as well as contribute towards biodiversity. However, in this case, the removal of the tree needs to be balanced against the fact that a suitable access to the IWMF needs to be provided. Furthermore, the proposal will actually increase the number of trees in the general locality as landscaping, including trees, are proposed along the new egress road. On this basis it is considered that the removal of the tree is justified.

Archaeology

82 The front half of the application site (Jet Petrol Station) is located within an APZ and as such it is recommended that a programme of site investigation works and evaluation is undertaken. This can be secured by condition(s) attached to any grant of permission.

Planning obligations [S.106 undertaking or agreement]

83 Planning obligations are intended to offset the negative impacts of a development and are required in accordance with policy 2.5 of the Southwark Plan. As it is the IWMF that is the "impact development" in terms of traffic generation mitigation measures through a Section 106 undertaking will be sought as part of the application for the IWMF, including a sum of money set aside for traffic monitoring and traffic management plan should this be necessary.

Conclusion

84 The proposed new road and associated works on Old Kent Road will provide the necessary access to a future integrated waste management facility which will serve the needs of the borough in line with the council’s waste management strategy. If a waste facility is not provided on the site, then the new road will facilitate access to this half of the site for any future alternative uses. The existing access to the site is not feasible for a IWMF or any other large-scale development and therefore new access arrangements will need to be in place. The proposed works are therefore considered to be justified in terms of helping to provide sustainable development and meeting local plan and London-wide strategic policies. Concerns were previously raised with regards to the loss of residential amenity and the detrimental impact on the environment and quality of life caused by re-assignment of traffic onto particular residential roads as a result of the banned right turns. The current application proposes to retain all the existing traffic movements at the Commercial Way junction and as such there will be no displacement of traffic as a result of the proposed new road and associated works to the highway. The application is therefore now considered acceptable.

COMMUNITY IMPACT STATEMENT

85 In line with the Council's Community Impact Statement the impact of this application has been assessed as part of the application process with regard to local people in
respect of their age, disability, faith RELIGION, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process. The impact on local people is set out above.

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