

# Objection to 20/01066/EIAFUL, land off Windsor Grove, SE27 9NT

On behalf of

Norwood Action Group, Norwood Forum, Norwood Planning Assembly,  
Station to Station (Business Improvement District)

This objection is subsequent to the additional documents provided by the applicant in December 2020 and January 2021. In the light of the massive amount of amended and new evidence, this objection updates and supersedes the community groups' objection of June 2020. That earlier objection in effect is withdrawn.

Our community strongly objects to the application. There are numerous grounds for refusal. This submission addresses only the most important

## *Policy references*

*Due to the proximity of both 'new' London and Lambeth Plans being adopted, and already carrying weight in planning decisions, the new policies are referenced in this document. Most matters have equivalence in the current adopted plans that will soon be superseded.*

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## Preface: Important procedural issues

The following matters cannot be objections per se, but they are of considerable significance to the management and consideration of the application.

The initial applicant documents published on Public Access on 20.3.20 totalled approximately 1600 pages. After close of initial public consultation, additional documents were published in July and August.

Then in January a second consultation was triggered by 1700 pages of further evidence: the December 2020 Environmental Statement (ES) and the Environmental Impact Assessment (EIA). This was then followed by a further 550 pages of evidence. That item, the Generic Quantitative Environmental Risk Assessment (GQERA), is cover dated October 2020. The reason for its three month late publication has not been given.

It is revealed in Paras 10 to 12 of the ES Non-Technical Summary (NTS) that the 1700 page EIA was finally scoped with LBL and delivered in just December 2020. The whole enterprise was clearly rushed and unchecked as there are a great many errors and inconsistencies. The overall effect could overwhelm with inconsistent and excessive loosely linked information, and confrontational statements, rather than accurately and concisely inform.

It is a requirement that the NTS be written so that the ordinary reader may understand. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 18(3) applies. The notes amplify: *“The main findings must be set out in accessible, plain English, in a non-technical summary, to ensure that the findings can more readily be disseminated to the general public, and that the conclusions can be easily understood by non-experts as well as decision-makers”*.

Insufficient regard has been paid to this requirement. Properly: the NTS should be withdrawn, amended and resubmitted, with public consultation extended.

One challenge throughout the application is varying traffic forecasts that are not understood despite our closest study. These halve HGV numbers compared to the applicant's own traffic survey by consultants '360 TSL' (TSL). Transparent simplicity would have been welcomed, as in the first applicant documents in December 2019 (reproduced in [Appendices B1 & B2](#)). These simply state the facts. They are everything that is needed. Most of the later and final extrapolations seem only tenuously coupled to the survey.

A letter to Lambeth dated 29.1.21 from applicant consultants Vectos disclosed that TSL's original traffic survey data utilising London Borough of Lambeth (LBL) approved COBA analysis was later modified with information from the applicant's own ANPR resources.

At ES Chapter 2 Para 2.95 it states: *“It is assumed that information received from third parties is accurate, complete and up to date.”* This is an unacceptable statement concerning methodology. This could affect, even transform, many matters. The EIA's work should examine everything, minimising assumptions. We presume the ES quotation above would not embrace client/applicant evidence and data, such as the accessed ANPR data.

*The overall impact on the public is the difficulty of responding to large amounts of sometimes inconsistent, unverifiable and moving information. These difficulties in the EIA and ES mean that in the following objection only key policy conflicts are addressed as it would be impractical to cover all.*

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## Non-Technical Partial Review (focussing on main public impacts):

The applicant's December 2020 Environmental Statement Non-Technical Summary (NTS) para 120, utterly implausibly concludes:

*“The assessment identifies that operation of the proposed Windsor Grove development will not result in any significant effects.”*

From all the evidence available, the above assertion is plainly wrong. The application with much contradictory and much incorrect evidence is in conflict with so many Lambeth policies. Even London and Lambeth policies have sometimes been reported incorrectly, or misinterpreted.

Decisions are always ‘on balance’, but it is clear that there are no local offsetting benefits for West Norwood and Tulse Hill, not even employment. The only proposed benefit is homes at Shakespeare Wharf, SE24, close to Brixton.

Currently Shakespeare Wharf is a “*safeguarded*” waste site. London and Lambeth policy requires replacement of the “*potential*” waste capacity that would be lost. That waste site is twice the area of Windsor Grove, with much better access, and wider roads serving it. As a consequence it is impossible for Windsor Grove to replace its potential capacity.

However, the intention stated in the Planning Statement is to transfer its entire waste metal business which is presently in Lewisham to Windsor Grove. There is no suggestion in the application as to what would happen to the waste currently handled at Shakespeare Wharf.

Lambeth would lose ‘use’ of both Windsor Grove’s and Shakespeare Wharf’s waste handling capacity. Lewisham would have a vacated waste site for ongoing use, and no one knows what would happen to Shakespeare Wharf waste.

It is stated that the Lewisham business if transferred to Windsor Grove would operate at 35,000 tonnes per year. Purely on a site size basis, London and Lambeth policies direct a maximum of 20,000 tonnes for Windsor Grove.

There can be no justification for the residents of Windsor Close (a quiet cul-de-sac of about 150 persons) as well as the wider area, to be distressed and overwhelmed by the daily c. 235 vehicle movements, including many immensely large HGVs, plus the constant ‘buzz’ of on-site operations.

The relocation southward six miles of the applicant’s Lewisham waste metal business to Windsor Grove would generate about an additional 350,000 vehicle miles each year. The pollution, congestion and road safety implications for the entire length of the borough are ominous. The impact on Lambeth’s Climate Emergency Targets would be hugely negative.

At a time of Lambeth investing so much effort and money on promoting walking and cycling, the physical intimidation of school children travelling on narrow roads cannot be permitted. Enormous waste trucks, some the height, width and almost the length of double-decker buses will be part of the considerable traffic travelling via these narrow roads to Windsor Grove. [Photo](#)

Three schools are very close: Kingswood Primary and Park Hall Academy about the site, and St Luke's Primary is within 250m on the HGV route, and another six schools within a mile on the HGV route. More than ever we are all aware of the adverse health effects of pollution, especially on the young.

This application can only be refused.

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## Details of objections:

### Re 1. Change of Use

In error, the application seeks "*continued use as a metal recycling and management facility*". That is not the historic use of any of the site, whilst part of the site is a Site of Importance for Nature Conservation (SINC).

The site consists of two distinct portions. The larger is the old car breakers' yard (.24ha) which ceased operations in 2019. This requires a change of use as part of the current application. The other portion, mainly if not entirely SINC (.14ha) has never had a use class, so needs an approval for the appropriate use class.

The Certificate of Lawful Use of 27.9.1994 is for "*Car Dismantling and Disposal*". Certificates are statutory documents that confer lawfulness only for the exact use specified.

Under that lawful use, 'end of life' vehicles were either brought or driven to the site where they were drained and dismantled, and the parts disposed of by retail sale of the used car components, and the residue as scrap of various kinds: metal, rubber, batteries, oil and other fluids. This amounted to a total quantum of the order of 100 tonnes each year.

The proposed use is very different. Instead, in the average full working day it is proposed that about 130 tonnes (35,000 tonnes per year) of already scrap metal, little if any from vehicles, is brought to the site to be traded, then sorted into types and consolidated for selling-on, then despatching in bulk. That is an entirely different process.

The proposed operation would generate a steady flow of delivery and service vehicles stated by the applicant to be about 220 vehicle movements each full working day, c. 60,000 each year (220 x 5.5 days x 50 weeks). The vehicle figure is likely to be greater as the applicant has not adjusted for offering not to accommodate trucks above 32tonne gvw.

The proposed operation in no way resembles by use or volume (an increase of 35,000%) that permitted under the 1994 Certificate of Lawful Use. Therefore a change of use application is mandatory for this portion of the site.

Further: the total application site is .38ha which has been achieved by newly leasing an additional .14ha of 'railway land' that is currently classified as a Site of Importance for Nature Conservation (SINC). Plainly this has never been part of the site covered by the Certificate

of Lawful Use, nor has any permission ever been granted. As such, it too requires a change of use application. This will need to be tested against SINC policies. See [Section 8](#) for other SINC policy requirements.

*This application should not be determined without consideration of the changes of use.*  
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## **Re 2. EiP 2020 draft Lambeth Local Plan ED3 and EN7; also PN7**

Policies ED3 and EN7 indicate Key Industrial and Business Area (KIBA) locations for uses including waste operations. However, it cannot be asserted that **all** sites within **all** KIBAs are appropriate or suited for **all** waste operations of **all** operation sizes.

Even the applicant acknowledges nearby sensitive receptors and road limitations. This is implicit by offering to shorten opening hours compared to its current operation. Also to limit trucks to no more than 10m length; also by suggesting altering the parking arrangements on Windsor Grove (which is not itself in the KIBA); and by other highway alterations contained in Appendix T of the December 2020 Traffic Assessment Addendum (TAA).

Suitability of a business in a KIBA is more than about just access. It would depend upon the specific details of the particular KIBA, the actual site within it, and the proposed use.

This principle of suitability is undisputedly embodied within LBL's Waste Evidence Base December 2019 (WEB) that is linked with the EiP draft Lambeth Local Plan 2020 (LLP)

WEB page 27 Para 5.1 states only that KIBAs "*should be the primary area of search*" for waste uses because, specifically:

- A reduced risk of "*being located next to more sensitive development, such as residential*"
- They "*tend in most cases to have access which is wide enough*"
- And tend to be "*well-connected to main road networks*"

None of these are the case at many locations within the West Norwood KIBA, including the application site. Table 5.1 on page 28 of the WEB then looks more closely at the relevant factors for specific waste uses, explicitly acknowledging "*potential issues*" and "*mitigation measures*".

The review of the West Norwood KIBA that follows from page 139 of WEB assessed waste site road access and closeness to sensitive receptors such as residential. At pages 143/144 it dismissed a better located local KIBA site. See [Section 6](#) of this document for the details.

Unfortunately the WEB did not assess Windsor Grove. It would have been bound to reject it as on page 144 the better site had been dismissed for anything other than "*smaller scale*" operations (applied mitigation). This application proposes a waste use almost double the London and Lambeth directions for site throughput (details in [Section 3](#) of this document).

*Nearby sensitive receptors – homes and schools:*

- The nearest home and garden within Windsor Close is 6m from the site's western boundary, and another 57 homes (approx. 150 people) within 140m.
- The rear of houses and the gardens of Auckland Hill are close to the railway line, and just 30metres from the site's eastern boundary, but from an elevated position.
- Kingswood Primary School and Park Academy (with pupils of all ages) abuts the southern site boundary, at the closest point about 20m.

Residents are entitled to quiet enjoyment of their homes; this would be forever lost to constant daytime noise of traffic and operations. Even if the latter is muted, it would still be an unreasonable imposition on the residential homes and gardens, and the schools.

#### *Road access:*

Whilst great efforts are planned by the applicant to make industrial activities within the operations building unobtrusive from the outside, it is not possible to eliminate all impacts. In particular we refer to 220 vehicle movements (applicant's estimate) each full working day (c. 60,000 each year). These vehicle movements would impact all approach roads in a neighbourhood of a "*strongly suburban nature*". This suburban context is noted by Lambeth planners in both LLP 2015 (Section 2, 2.5, and West Norwood 11.93) and draft 2020 (Section 2, 2.4, and West Norwood 11.66). Lambeth policy is to protect the character of neighbourhoods. Road traffic issues are addressed in more detail in [Sections 5a & 5b](#).

Policies ED3 and EN7: as with all policies, they provide a context for a decision but they cannot, nor do they, infer consent, as asserted by the applicant. Due to the safeguards in the policies, in the particulars of this application they direct toward refusal.

However, no consideration whatsoever is given to the area policy PN7 F iii contained in the EiP draft LLP for Norwood High Street to have "*Creative Business Cluster*" designation. This is intended to foster digital and creative start-ups and small enterprises. A major waste metal site in Windsor Grove with all the attendant disturbance of c. 220 vehicle movements each day is harshly inconsistent with this policy, and would tend to cause its failure.

#### *Conclusions:*

It can be seen that the essentials of good access roads and absence of sensitive receptors certainly do not apply to the proposed location. Any application within a KIBA site has to be decided on the impartial basis of policy, and rationally evidenced predicted impacts. The delicate concept of 'an acceptable level of harm' cannot apply as the impacts are so great.

We assert that under policies EN3, ED7 and PN7 Windsor Grove is not appropriate for the proposed use and therefore the application must be wholly refused. The inappropriateness cannot be resolved by mitigation, obligations or conditions.

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### **Re 3. Over-intensification of waste throughput**

London and Lambeth's direction for waste sites of this type in Tale 5.1 in WEB is currently stated as 60,000 tonnes per hectare per year (60kte). 5.1 also clearly states "*vehicle movements*" as a "*potential issue*" [\[see Sections 5b & 6\]](#)

As the WG site would be .38ha, this calculates to a little over 20kte. The application states 35kt – almost double the calculation. The "*potential issues*" of traffic and multi-pollutants would also be roughly doubled compared to the 20kte policy calculation.

Based on the London and Lambeth policy, 35kte clearly demonstrates gross over-intensification of the site, so the application should be refused.

This is reinforced by the specifics of the application delivering utterly unacceptable impacts on the immediate neighbours of the site, also the wider district. [\[see Sections 5a, 5b & 6\]](#)

If the proposed level of activity should be limited to London and Lambeth's policy intensity levels, the local impact would be roughly halved, though would still be excessive due to the specifics of the location and neighbourhood.

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#### **Re 4. Apportioned waste (and comparison with unapportioned waste)**

LLP EN7 A iii and iv refer to waste and apportioned waste. London policy requires each borough to have a plan to meet the GLA targets for handling apportioned waste.

Apportioned waste arises principally from Household, Industrial and Commercial (HIC).  
Unapportioned waste arises from Construction, Demolition and Excavation (CD&E).  
The London Plan 2020 at 9.8.13, and the definition of CD&E on page 572, make this plain.

The February 2020 Planning Statement (PS) Para 7.2.15 states that Windsor Grove is to be the relocation site for Southwark Metals' established waste metal business [*presently located in Lewisham, SE8*], projected to process 35,000 per year. It erroneously states that all waste metal is apportioned waste. Much of the waste handled there is demolition metal, such as RSJs, and reinforcing bar (rebar). This unapportioned waste tonnage cannot be falsely designated as apportioned. Interestingly, the ES at Para 1.11 contradicts the PS, but elsewhere in the ES in this regard at least it is consistent with the PS.

In short: much of the 35,000 tonnes per year would not be apportioned waste, therefore only a proportion can count toward Lambeth's apportioned waste GLA target. This would leave a shortfall on Windsor Grove's contribution to the target.

In any event there is a fundamental false assertion. The application asserts that that Windsor Grove would provide compensatory apportioned waste capacity for the proposed loss at Shakespeare Wharf. This is incorrect. **NO** Shakespeare Wharf waste whatsoever is proposed, or even could be, taken to Windsor Grove – it would immediately be operating at full capacity due to the transfer to Windsor Grove of Southwark Metals' Lewisham business.

Literally, no one knows what will happen to the mixture of apportioned and unapportioned waste currently handled at Shakespeare Wharf, if that site should be closed for waste.

Whilst it is acknowledged that waste is not strictly confined by boundaries, 'losing' Shakespeare Wharf is clearly an extremely poor proposition for Lambeth managing its waste flows, both apportioned and unapportioned. The net real effect would be a total loss of Lambeth apportioned waste capacity at both sites. This is fully explained in our groups' objections to linked application 20/01822/EIAFUL (already submitted to Lambeth Planning).

However, just regarding the linked applications: both should be refused as the incoming 35kte of waste metal, even if regarded as Lambeth waste, would only in part be apportioned waste, insufficient to meet compensatory capacity requirements for Shakespeare Wharf.  
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#### **Re 5a. Trucks, Traffic Plan (ineffective / unenforceable); omissions**

ES Para 7.109 and linked Table 7.13 classify local streets for "*sensitivity*". All the key streets (other than Windsor Grove) are stated as "*High*" sensitivity. However, the survey does not assess Norwood Road through West Norwood town centre where much site traffic is bound to pass. This too is High Sensitivity.

In all such considerations, the size, weight and bulk of the range of trucks attending the site daily via these local roads MUST be kept foremost, as well as the quantum and frequency.

The largest 44tonne trucks are used by the applicant and the waste industry generally, as well as smaller vehicles. However, the applicant has stated willingness to be restricted by condition to 10m (33feet) length. These can be 32tonne gw hook-loader bulk-carriers.

Even these can be as tall as a London double-decker bus (sometimes taller), almost twice as heavy as a fully laden bus, and almost as long, as shown in the following photo.



*Note the truck bulk and height relative to the yellow jacketed attendant. Such trucks are intimidating and dangerous to all. These behemoths should not be close to pedestrians or cyclists, especially of school age, which would be the case on our local narrow streets.*  
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However, as the application currently stands the largest trucks of up to six-axles 44tonne (also with draw-bar trailers, or artics) could legitimately visit the site. A condition or s106 obligation requiring limitation to 32t gw would have no means of enforcement.

The applicant has acknowledged that large and heavy trucks approaching via the town centre would not be acceptable. The proposed traffic plan in Figure 7.11 in the ES for the stated 220 largely heavy vehicle movements each day (c. 60,000 each year) via the B232 Norwood High Street / Elder Road (432 bus route) heading south avoids Tulse Hill and the town centre of West Norwood.

However, this can only be an instruction to its own drivers, and at best impotently recommended to other drivers. ES Para 7.120 the applicant uses the word “*encouraged*”, tacitly acknowledging impotence. Independent vehicles would form the vast bulk of the traffic, thus Tulse Hill and West Norwood town centre would also suffer.

Having said that, the proposed southern Traffic Plan HGV route (onto the A214 Central Hill / Crown Dale, east or west) has no fewer than nine schools in less than a mile: Kingswood Primary Lower School; Park Campus Academy; St Luke’s Primary School; Virgo Fidelis Senior School; St Joseph’s Infant and Nursery School; St Joseph’s Junior School; The Norwood School; St Joseph’s College; Crown Lane Primary School.

And if Leigham Court Road then used to connect with A23 Streatham High Road, another three: St Julian’s Primary; Dunraven Primary, Secondary and Sixth; Beechwood Nursery.

West Norwood is an unsuitable location. There is no local route that can safely or acceptably carry the volume of HGV traffic generation. It should be noted that the hours of greatest HGV activity are school arrival and departure times as shown in the [spreadsheet](#).



The application is for Southwark Metals to transfer its current business from Lewisham (where most associated traffic is to and from central London, the local area, also the major redevelopment areas beyond to the east). That traffic would then need to journey south another 5½ miles to Windsor Grove, or 6 miles if using the Traffic Plan HGV route.

That routing via Crown Dale / Central Hill would result in HGVs through other town centres and residential areas within Lambeth, Southwark and beyond. Gipsy Hill, Upper Norwood, Dulwich, Peckham. Or Streatham, Brixton and onward. All would bear some of the brunt of this unnecessary re-location of the Southwark Metals business from Lewisham.

Based on the applicant's own 19.9.19 vehicle survey data by consultants '360 TSL' (TSL), this calculates to the order of 350,000 extra vehicle miles per year in Lambeth. (6 extra miles x 220 trips x 5.5 days x 50 weeks).

It should be noted that the applicant at its current Lewisham site is located in the midst of a major industrial area with all the ease of access that confers. It is close to the A2 major trunk road for both incoming vehicles and exiting fully laden 44t gvw that travel to more distant locations for re-smelting, etc. Compare this with the hemmed-in Windsor Grove site just 400m from West Norwood town centre, with poor access via narrow suburban streets.

There are several options of connecting roads north, but the direct 'desire-line' for drivers to and from Windsor Grove is via West Norwood town centre. Here, prior to covid, the pavements were widened and the carriageway narrowed so that now in places, large vehicles cannot pass each without one having to give way to the other. This work was part of a Lambeth and TfL plan to improve the cyclist and pedestrian shopping experience with calmed and reduced traffic with attendant reduced pollution. This is further addressed in [Section 6](#).

Nowhere in the application documents is regard given to the numerous low 'under-rail' bridges in the area. The nearest, within 200m north on *Norwood High Street*, is 14'9" clearance, and some 32tonne hook-loaders can exceed this, also others with projecting loads. Bridge strikes at best cause chaos, worse cause injury, at worst – death.

Close to the site in Gipsy Road, the 'over-rail' bridge at Aubyn Hill has a limit of 18tonnes. With many and frequent 32tonne (possibly heavier) daily truck journeys that would be generated in the area by the applicant's business, there is the risk of non-compliance with the weight limit.

In addition the 'over-rail' bridge on Knight's Hill, although not presently weight restricted, is under observation by Network Rail due to structural faults.

There are no proposals that would protect these bridges other than the Traffic Plan. Even if one should be a condition or obligation of an approval, there's no means of enforcement.

The only effective option is to refuse the application.

It should be noted that there are currently another three other current planning applications within 50metres of that junction which may be determined before this one: 20/04374/FUL; 19/01267/FUL; 21/00365/FUL.

The latter application for no. 82 Norwood High Street is perhaps the most significant, being made by the owner of GNK at no. 80. It is therefore in all probability a business expansion. This could exacerbate the existing B232 Norwood High Street traffic problems.

In addition, GNK is currently appealing against some conditions, particularly concerning delivery and servicing arrangements. Vehicles are frequently 44tonne artics and draw-bar

trailer units which at times already fully block the B232 (a bus route) for extended periods whilst manoeuvring in and out of the GNK yard. This appeal may be determined prior to this application's determination.

With these matters, and permitted parking, the idea of a 1000 vehicle per hour capacity for Norwood High Street as suggested by the applicant is risible.

Swept Path Analysis warning. Presumably due to the applicant offering a Travel Plan to the south, no swept path analysis has been provided for HGVs approaching from the north and turning into Windsor Grove, as some would do. This could only be done by approaching on 'the wrong side' of the road – head-to-head with oncoming HGVs from the south.

The insanity of all this cannot be underestimated. The applicant's assertion that the effects on Norwood High Street B232 and Windsor Grove would be "*negligible*" is plainly nonsense. For these reasons alone, the application should be refused.

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## **Re 5b. Traffic quantum, particularly HGV**

The Applicant's EIA, and subsequent letter of 29.1.21 to Mr B Oates (with a supporting further amended Appendix Q), makes various assertions concerning the traffic calculations. The ES then further confuses matters with inconsistencies between various paragraphs and tables within Chapter 7. Applicant confusions make the following matters very complex.

Accepting, as Lambeth has, and we do, the applicant's consultants TSL's original survey data of 19.9.19 at Ruby Triangle, then the future total traffic forecast (by a different applicant consultants, Vectos) is under-calculated, as well as the proportion of HGVs (OGV1 and OGV2 are both HGV – see [Appendices B1 & B2](#): these are applicant documents that in December 2019 simply stated the facts, and everything that is needed.

The Vectos forecast is for 220 total vehicle movements each weekday of which either 117 or 75 are HGVs, depending on which specific edition of the applicant's Appendix Q is studied. These matters are dealt with in transparent detail in [Appendix A](#) and its spreadsheet.

The [spreadsheet](#) starts from TSL survey data as published in the very first Appendix Q of March 2020 Transport Assessment (TA). Vectos forecasts follow, then our own transparent calculations.

A likely daily HGV movement count is 150. The final additional 15 HGV movements is a result of more 32tonne trucks being required to replace 44tonne trucks. It appears this has not been addressed by Vectos, so 15 is also added to the Vectos forecast of 220 total daily movements (all vehicle classes), making 235 in all.

Regarding the proportion of HGVs, ES Tables 7.17; 7.18; 7.19 assert c. 66 HGV above daily baseline, but then it cannot agree with Table 7.7 on the actual baseline (either 43 or 35).

Even on those low HGV numbers we believe the local impacts would be massively damaging, as well as further afield. However, the HGV is likely to be 107 or 115 above respective baselines (150 minus 43 or 35).

Percentage wise, Tables 7.15 and 7.17 both reflect a daily increase over baseline of 66 HGVs = 153%. The transparent figure in column 7 of [spreadsheet](#) of 150 HGVs gives an increase of >350% (or >400% if using the Table 7.7 baseline of 35).

These facts are likely to be above the 'severe' threshold of the NPPF.

Long portions of Norwood High Street and Elder Road cannot support two HGVs passing; even less so Windsor Grove. The applicant's TAA at Summary and Conclusions Para 7.3 acknowledges that the junction of Windsor Grove would on occasions suffer "*block back*" – the only matter of dispute is how often.

The application appears silent regarding the event of failure of the electric gate or indeed business interruption for any reason – the block back would rapidly become catastrophic.

The 432 bus route could readily frequently be blocked, but more importantly, the ability of emergency vehicles to attend calls speedily – potentially impossible for residential Windsor Close, as well as the businesses in Advance Road, and Royal Mail in Windsor Grove.

With other non-applicant existing traffic one can reasonably predict an all-day average of a vehicle movement every three minutes. However, traffic is not a steady flow, there are peaks and lulls in activity. At peak hours site and other local business traffic would reduce the average to about one every two minutes. Even then it would not be an even flow; in a five minute period there could be say five HGVs, and in the next five minutes none.

The frequency of block back, and HGVs blocking each other, would be considerable, both on Windsor Grove and Norwood High Street / Elder Road B232.

Within this objection's [spreadsheet](#), our evidence-based transparent calculation of 150 HGV movements per day is fully explained. The predictable impacts are now plainly evident for local residents, schools, businesses and bus route due to noise, vibration, congestion, blockage, pollution, safety – particularly to cyclists, and emergency access.

It is worth noting that Road Safety consultants Gateway TSP even in December 2020 was calculating and reporting (TAA Appendix R Para 22) under the illusion of the proposal being a Waste Transfer Station (WTS) ELV facility (end of life vehicle dismantling and recycling): "*The proposal is to replace the existing car breaker's yard with a modern WTS dealing explicitly with motor vehicle depollution.*" – utterly different than the proposal.

Impacts of all kinds would be of a much higher order than the applicant attempts to assert in the March 2020 TA all the way through 4000 pages to the December 2020 EIA and beyond.

It is clear that no reliance can be put on the conclusion at 7.179 of the ES Traffic Section: "None of the residual effects of the Proposed Windsor Grove Development are considered to be significant." In the face of clear evidence to the contrary, this application must be refused. [\[return to index\]](#)

## **Re 6. Sensitive receptor issues**

This application is ironic. The applicant has disingenuously stated that Shakespeare Wharf SE24 is unsuited to waste operations due to the proximity of homes and one school, and that Windsor Grove is suited. The sensitive receptors are at greater distance than those beside Windsor Grove, and road widths and access far better than at Windsor Grove.

Many neighbours of Shakespeare Wharf would like closure of the Norris waste site that handled a maximum of only 20,151 tonnes of waste in 2017 (Lambeth Waste Evidence Base, December 2019, Appendix A, Table A.1). There is currently a petition to Lambeth to advocate closure. <https://www.change.org/search?q=norris%20waste%20management>

This core historic factual experience of unacceptable impact of the 20kte waste operation on residents' amenity in Shakespeare Road is candidly endorsed by the applicant. On this basis, this application for a 35kte site in a smaller, vulnerable location can only be refused.

The neighbours of Windsor Grove would be in closer proximity to a far busier operation – 35,000 tonne and 60,000 vehicle movements, largely HGV (65%), each year. Residents, school parents and businesses all vehemently oppose this. This is evidenced by the public objections exceeding 1400 entered against the application, and a petition of more than 4000 signatures <https://www.change.org/search?q=windsor%20grove%2C%20west%20norwood> This represents a very significant proportion of the local adult population. Not one voice has been heard in favour of the application.

Further, in evidence given on behalf of Southwark Metals to Southwark Council's Old Kent Road Business Network regarding alternative sites for its Ruby Triangle operation, the applicant was even more candid, admitting:

- Southwark Metals stated it could not operate in a mixed use area that includes residential
- Southwark Metals themselves stated this was because of “noise, heavy lorries”

This evidence is shown at [Appendix C](#).

Concerning the West Norwood KIBA, the Lambeth Waste Evidence Base 2019 on page 143 reviews a vacant local site on the corner of Knight's Hill and Chapel Road of almost identical size to Windsor Grove:

*“There are two main constraints to a waste facility on the vacant plot of land at the corner of Chapel Road and Knight's Hill: the proximity of residential housing and the suitability of road access for large vehicles and an increase in traffic... The scale and operation of the facility will be important. Ensuring a small-scale facility will help mitigate noise... Therefore large-scale recycling, reprocessing or treatment facilities are unlikely to be suitable for this site. Noise and vibration from goods vehicle traffic movements to and from a site is a key consideration.”*

The same report on page 144 concludes that site is only suitable for “smaller-scale” operations. Windsor Grove is located in an even more restricted and sensitive location.

The ES and NTS assert that the impacts of the operations described in the application can be compared to resuming car breaking at 25kte. It claims this can be continued based on existing permits. This is fallacious as car breaking ceased in 2019 and the site has been cleared of the little infrastructure that it had. An Environment Agency licence applied to only part of the site. An inspection would suspend the permit, pending installation of appropriate infrastructure. This would require a planning application to Lambeth, the outcome of which would remain to be seen.

#### *Hours of operation:*

Hours of operation is a critical issue. Whilst such matters can often be dealt with by condition, in this case restrictions must be stringent, which could affect the viability of the applicant's business plan, so should be considered a core issue.

The proposals of 8-5 weekdays, 8-1.30 Saturdays are wholly unacceptable. There would be vehicles queuing prior to gates opening (the applicant's TCL survey evidenced early morning rush) then constant traffic through to closing time.

It cannot be acceptable that from about 7.30am HGVs with vibration, fumes and noise, including air-brakes, audible reverse alarms, etc can continuously manoeuvre within yards of resident's homes, bedrooms and gardens. It should be noted that Windsor Grove, even without parking, is too narrow in places for two large vehicles to pass each other, which would just exacerbate the truck drivers' challenges.

In the period up to 9am, and from 3-4.30pm, the many nearby schools are assembling or dismissing with throngs of pupils of all ages, some pedestrian, some by car, some by cycle. National and local policy is to encourage walking and cycling.

To have hazardous traffic generation (directly a physical risk, and from pollution) during those periods cannot be permitted under any circumstances.

Saturdays (when many people are seeking rest and the town centre would be at its busiest) should have no activity whatsoever.

We therefore assert that even if the site use were to be modest, the hours should be restricted to 10am to 3pm, Monday to Friday.

Such constraint of hours would not allay our many other objections, whatever the volume.

These matters could make the business unviable, but that is not our concern.

#### *Air quality:*

The ES at 8.3 and 8.10 states: *“For the purposes of [Air Quality] modelling, traffic data for the relevant local road network was provided by the Applicant’s transport consultant.”* (Vectos). Section 5b above has clearly demonstrated that this data substantially under-states the HGV count by approximately 50%.

Consequently no reliance at all can be put on the ES Air Quality conclusion at Para 8.125: “The effect of the Proposed Windsor Grove Development on local air quality has been predicted for sensitive receptors surrounding the site and the overall effect on air quality is considered negligible.”

The applicant makes much of the very few trucks that it operates all being Euro 6 engines. Also the operations building, which would also enclose some of the queuing vehicles, would be equipped with fume extraction with NOX and PM<sub>2.5</sub> filtration, and noise attenuation. All this is to be highly commended. However, equipment is always susceptible to breakdown.

It has to be kept in mind that only some of the vehicles visiting would be powered by latest generation engines. For HGVs, Euro 6 diesels (still polluting, but less so than earlier engines) are now required to enter the Greater London Low Emission Zone unless a substantial daily fee is paid, but any age sub-HGV is legally permissible at Windsor Grove. This is of great concern for the neighbours, especially parents, on the approaches to and from the site.

It CANNOT be argued that traffic will flow readily on Windsor Grove (or indeed Norwood High Street, details in preceding [Sections 5a & 5b](#)). It won't. Even if parking is totally eliminated the road is as narrow as 5.3m, and most heavy vehicles are built to 2.55m (excluding mirrors). At best two such vehicles could barely pass each other.

In practice, trucks will often find it necessary to mount pavements, or to back-up (with reversing-alarm sounding), and generally make slow progress with noise, vibration and fumes. The TA Appendices N and P illustrate the narrowness and challenges for HGV drivers.

Drivers' credentials and documents will initially, even if briefly, be checked at the site main gate. The application appears silent on this specific matter other than including Lambeth's Principal Transport Planner's concerns in Appendix A of the TAA. These concerns appear to remain unanswered. Perhaps the applicant has not considered this important matter.

Gate control could frequently totally block Royal Mail yard access in or out with the possibility of other vehicles backed-up behind (further blocking Royal Mail access).

In addition, trucks arriving before opening time will queue on Windsor Grove, potentially blocking ALL traffic until the waiting queue is cleared following the site opening for business.

Non-specific “*block back*” concerns appear in the TAA in Windsor Grove Impacts, Paras 4.39 and Wider Highway Impacts 5.40 where it is said that “...*measures have been identified to reduce the propensity of vehicles to block back onto the B232.*” Note: “reduce”. However, most importantly, this was based on the impossibly low forecasts of HGV movements.

It is agreed that block back will occur. As in previous Section 5b – the only matter of dispute is how often. In the event of business interruption it would rapidly become catastrophic.

It is clear that with c. 220 vehicle movements daily, the release of pollution from the mix of vehicles travelling slowly and hesitantly on Windsor Grove will be considerable. This pollution will release immediately adjacent to the homes and gardens of Windsor Close. One should be mindful that due to the lie of the land, the site is situated at the lowest point – see applicant’s plan: Proposed Site Sections - S01, S02. This shows that the site and its immediate surroundings form a natural ‘sump’ for fumes, and indeed water, to accumulate.

The impacts of sorting and consolidating waste metal within an enclosed space with noise attenuation and filtered ventilation (itself a possible generator of noise) may not be loud or conspicuous, but still unreasonable due to its constancy. Inevitably, on occasions ventilation / filtration will break-down (notwithstanding the applicant’s proposed maintenance condition to keep in good order and working to standard) and the ‘barn doors’ would need to be left open.

It should be noted that PM<sub>2.5</sub> filtration does not address sub 2.5micron particles that can pass directly through membrane tissue into the cells of persons exposed. These are considered to be very hazardous, particularly to the developing brains of the young. There are homes adjacent and two schools abut with primary age children. The assistant Southwark coroner recently delivered a verdict which included vehicle pollution as a cause of death of a young person. The causation of asthma and then subsequent effects on sufferers has been established for decades, only direct cause of death is new. It is inconceivable that these concerns could be dismissed.

The applicant’s Air Quality Assessment suggests that any effects will be zero or negligible. The NTS at Para 136 states: “*No likely significant air quality effects have been identified as a result of the Proposed Windsor Grove Development and Proposed Development as a whole.*”

This is plainly recklessly incorrect and achieved by disingenuous scenarios, including: simplified modelling, halved quantum of HGVs, free-flowing traffic, assumed reducing background NO<sub>2</sub>, and a presumption of the rapid take-up of low pollution vehicles by the many. Furthermore, this assessment does not address whatsoever the many effects on the wider area, and Lambeth and national targets to reduce emissions to net zero.

The applicant, in factoring-in hard-won general background air pollution reduction to mask the impact of the c. 220 vehicle movements each day, c. 60,000 each year, must NOT be allowed to justify negating or reversing such hard-won benefits.

Our town centre air quality, although not good, has improved greatly since most of the public buses became hybrid. There is pressure for electric buses due to the air quality still being sub-standard. Even if a modest proportion of the site traffic uses the town centre to travel to and from the *Windsor Grove*, all the hard-won improvements by Lambeth, local councillors

and local groups and those hoped further improvements would be reduced, negated or reversed. It should also be remembered that many of these vehicles (as shown in the earlier photo) are enormous and physically intimidating in the town centre, also on the narrow local roads.

There is only one answer to these unacceptable impacts – refusal of this application.

#### *Land heave:*

An additional long-term threat is land heave. This could affect nearby housing, also the trunk combined sewer with river Effra in culvert, possibly the railway embankment.

The GQERA geotechnical conclusions; 7.8 and 12.8 warn of the potential for heave that could be caused by the required massive concrete platform laid on made-ground, supporting a 40 x 125 x 12m tall industrial building, with internal operations and large 'rotating' volumes of waste metal.

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## **Re 7. Employment and employment space obligations**

The linked Shakespeare Wharf application seeks to meet requirements for such obligations solely by employment at Windsor Grove. The March 2020 Workplace Travel Plan Statement (WTPS) at Para 3 states that ten jobs are "likely" at Windsor Grove. In the EIA Main Report Para 4.107 the number is seven; at 6.107 and 6.127 "similar" to current operation, and at 7.154 ten jobs.

The application appears silent on the number employed at Southwark Metals' current business. As this is the business that would transfer it would be appropriate for evidence of employment numbers for the past three years to be provided to bring in some certainty. In any event the number is not large. It is unlikely this number is sufficient to satisfy replacement numbers for both Shakespeare Wharf and Windsor Grove.

'Car-free' is interesting as key family employees and long serving staff do not live locally and with no assurance of convenient public transport routes. It's noted that one blue-badge space is to be provided but no staff parking spaces. In reality some staff will park on-street or informally on-site. One wonders whether some staff will drive to work in company goods vehicles and use the on-site parking provided for these.

The February 2020 Planning Statement (PS) Para 8.1.1 reports S106 Heads of Terms offers only "reasonable endeavours" limited to just two years to secure 25% of local employment, so there is no assurance of local employment. With family members and long serving existing staff it seems likely there would be no local employment opportunities whatsoever.

The proposed s106 is of no value in this respect.

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## **Re 8. Site of Importance for Nature Conservation (SINC) issues**

This SINC land is NOT within the KIBA. Under draft LLP Policy EN1 whilst SINC's are 'protected', appropriate compensatory measures are required where such land is lost or degraded. This compensation is normally considered to be setting-aside and protecting other land, not as proposed here, simply surrendering existing land to industrial use and adding notional 'enhancements' to the margins.

Much of the SINC has already been cleared and graded destroying trees and much habitat. This includes areas where both bats and hedgehogs among many species have been observed and appreciated by neighbours. These have also been logged by the applicant's

ecological surveyors, who in the February 2020 Ecological Impact Assessment (Ecol IA) Para 2.11 also suggest the “*potential for badger setts.*”

Relevant noise and lighting issues have not been properly considered.

Whilst green walls and sedum roof are to be created, these do not provide adequate offset for losses. Box habitat for bats, birds and invertebrates, hedgehog houses and log piles whilst useful, are woefully inadequate substitutes for a loss of genuine SINC.

Even with good maintenance, green roofs and walls are notorious for failure, and could disappointingly become sterile and dead rather soon. The applicant’s claim of uplift in bio-diversity is based on unreasonable, arbitrary and notional scoring of planned alleged ‘improvements’.

The claimed uplift relies almost entirely on the vulnerable sedum roof. This appears to be ‘green-wash’ by the subjective low scoring of ‘before’, and high scoring the not yet delivered and vulnerable ‘after’.

We remind that .14ha of the application site has never been used for any purpose and was thus a natural nature reserve protected with SINC designation, and cannot easily be equalled let alone improved.

We ask that the correspondence involving LBL officers Dr I Boulton and the project consultant ecologist Ms S Rogers in Appendix E (also referenced as Annex 2) of the Ecol IA should be reviewed carefully. This represents an independent, concise and candid view of the site’s history, present, and likely future ecological profile.

We suggest that consent is not given to surrender this SINC land to industrial use.

This would be shameful in 2021. The SINC has been prematurely ravaged. Careful thought must be given as to how this may best be restored following refusal of this application.

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## **Re 9. Ground conditions and hazards**

The Effra river is in a trunk combined sewer flowing either under or beside the site. LBL officers Dr I Boulton and Mr J Newman report that the Effra, contained by a brick culvert at uncertain depth since the 1860s, is directly beneath the site (Ecol IA, Appendix E / aka Annex 2).

They also state some Effra water shows at surface level of the northern end of the application site, responsible for the impossibly muddy conditions throughout the year. These conditions caused the last operators of West Norwood Car Breakers to run-down operations.

These surface and subterranean factors are the likely reason why this site has never been properly developed. Much care is clearly needed.

Thames Water’s stylised evidence map on page 6 of Appendix B of the February 2020 Drainage Strategy (DS) from consultants Waterman gives a stated approximate course along the west boundary of the site of the 1.5 x 1 metre combined sewer, stating: “*The actual position of mains and services must be verified and established on site*”.

The DS Section 3 on page 6 states that work to locate its exact alignment and depth and that of another sewer is to be undertaken.



Following the DS, the applicant's GQERA at 5.2 states: "*No underground structures or obstructions were encountered during the ground investigation although a redundant 250mm diameter ceramic pipe was encountered*".

Whether this excludes the possibility of the combined sewer beneath the site isn't plain. It perhaps suggests that the combined sewer may be along the western boundary.

On the basis of the evidence of LBL's own officers and applicant evidence from its consultant and Thames Water, it is beyond doubt that the combined sewer flows beneath the site or immediately parallel to the site at presently unknown depth.

The applicant's January 2020 Flood Risk Assessment (FRA) by different consultants OCSC at Part 6 Conclusions and Recommendations state that the site is at "*medium to high risk*" of flooding due to the "*lost River Effra*". The report states this requires "*...flood evacuation escape routes, in-house warning system...*"

Whether just outside the site or within the site a large brick culvert at unknown depth containing the large natural flow of the Effra mixed with sewage for 150 years can only be described as vulnerable to construction engineering works, then susceptible to the year-on-year attrition of c. 60,000 vehicle crossings over each year, and perhaps from long-term land heave (see the preceding [Section 6, final paragraph, land heave](#)).

The Effra's exact location and depth must be determined and, if necessary, adequate protection assured. We again ask for careful consideration by planning officers as it is a matter of potential serious infrastructure damage risks, including collapse, and serious flooding homes to about 1 metre depth at the bottom of Pilgrim Hill. This has happened before, though not recently, but could if the culvert were to collapse.

As the application provides only general information concerning the location and depth of the Effra combined sewer, and no consideration is given to protective measures, this lack of information alone is a ground for refusal.

#### *Unexploded Ordnance:*

Only in December 2020 was the October 2019 UXO desktop study by consultants EOD Contracts Ltd published in Appendix 3 of the GQERA. This established that the site is at medium risk of unexploded bombs, with potentially serious consequences. It recommends physical site investigations and expert supervision of any ground works, including geotechnical investigations for other purposes. It is not known what tests may have been commissioned and executed as no reports have been published.

Until such investigation reports are published, the application should be refused. This is necessary, because if any UXO is located (with potential to 12m depth), only then will it be possible to determine whether this can be removed, or alternatively officially classified as 'safe' and permitted 'abandoned' for building over.

These possibilities could impact construction plans, especially concerning piling (which may be the preferred means of providing a stable concrete platform for the operations building).

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Appendices A1, A2, B1, B2, C follow on pages 18 to 22

## Appendix A1 (rev.1):

### Matters arising from letter from Vectos to LBL, 29<sup>th</sup> January 2021

This letter disclosed that the survey on 19.9.19 was by '360 TSL' (TSL). This information was circulated at two public consultations in December of 2019, see [Appendices B1 & B2](#).

Contrary to the suggestion on page 2 of the letter, we are not aware that *"the survey results were questioned"*. The data seemed consistent with what had been observed on a visit by invitation just one week before on 12<sup>th</sup> September in terms of split by vehicle type. However, there were *"concerns"* about the reality it reported, particularly HGVs.

Vectos states TSL used COBA Manual vehicle classifications and that LBL found the data *"an appropriate basis"* for evaluation. The source data seems reported in *"Weekdays (Recorded)"* data in Appendix Q of the *March Traffic Assessment*.

We are content to rely on the expertise of TSL who claim all the resources and technology necessary to provide correct data. <https://360tsl.com/traffic-surveys/>. This data reported cars, LGVs, OGV1 and OGV2 as defined by COBA [*OGV1 and OGV2 together being HGV*].

On page 2 of the Vectos letter it is stated there are *"cross-overs between the OGV1 and OGV2 categories... that can over estimate HGVs"*. This makes no sense as both are HGV.

We are happy to offer that a few Light Goods Vehicles could have double-wheel rear axles which the layman might confuse with an OGV1, although we believe that it is within the expertise of TSL to make the 'correct call'.

**However, Vectos casts major doubt on TSL relevance, disclosing in the letter that SM's in-house data collection was then applied to the TSL recorded data. Then new data splits were created based on vehicle lengths, achieved by unclear means.**

**This breakdown by length is of no value whatsoever in identifying HGVs as they can be under 7metres (23feet) in length. On the basis of Tables 1 and 2 of the letter, 100% could be HGVs. The adjusted data by length was then converted back to "artificial" HGV data.**

Much reference is made to SM's ANPR data. We do not know what data would be available to Southwark Metals via its ANPR, and whether under GDPR permitted to share with anyone, including Vectos. Potentially the registered vehicle class would be available; if so the TSL data could be compared. It is claimed that vehicle lengths are disclosed, but we question this. It requires public release of data, or at least to LBL, for this to be tested.

The letter was accompanied by yet another Appendix Q. The fourth Q to be published seems to reflect Table 5.1 of the March TA but with minor tweaks.

We suggest that there is no reason to doubt the specificity and utility of the original TSL data. This should be the basis of a simple and appropriate final traffic forecast to embrace:

- appropriate 'compression' of 7am to 6pm data into 8am to 5pm (maintaining the peak periods rather than 'smoothing' them).
- more vehicles due to the proposed cap at 10metre (32.8 feet) length – usually equivalent to max 32tonne gvw.

*Our groups' informed and transparent spreadsheet starting with TSL's traffic counts follows.*

**Appendix A2: Data and Appendix Q comparisons** [Return to Section: [Index](#), [Preface](#), [Non-Tech Summary](#), [1](#), [2](#), [3](#), [4](#), [5a](#), [5b](#), [6](#), [7](#), [8](#), [9](#)]

Note: all counts are for total HGV movements (combined OGV1 and OGV2).

360 TCL Two-way OGV1 + OGV2 - Recorded and derivatives								
	1	2	3	4	5	6	7	7b
	360 TCL March TA App Q Recorded	Vectos March TA App Q Revised (+13%)	Vectos March TA text Table 5.1 (+13%)	Vectos December TAA App Q (+13%)	NAG - column 1 with time shift	NAG column 5 +13%	NAG column 6 with count adjustment**	OGV1 and OGV 2 peak 2 hour period
07:00-08:00	8							
08:00-09:00	9	10	5	6	15	17	19	8-10am - 36
09:00-10:00	13	14	10	9	14	15	17	
10:00-11:00	9	10	7	8	10	12	14	
11:00-12:00	11	12	7	8	11	13	15	
12:00-13:00	15	16	8	8	15	17	19	
13:00-14:00	13	13	9	9	13	15	17	
14:00-15:00	15	15	12	12	15	16	17	2-4pm - 38
15:00-16:00	18	18	10	11	18	20	21	
16:00-17:00	8	9	5	4	9	10	11	
17:00-18:00	1							
	120	117	73	75	120	135	150	

Note: Columns 2, 3 and 4: the totals on the Vectos source documents are incorrect.      \*\*WG restricted to 32tonnes; estimated 15 extra HGV movements/day

- Column 1: Vectos March TA Appendix Q “**Weekdays (Recorded)**”, TSL COBA based data as said accepted by LBL as “an appropriate basis”.
- Column 2: Vectos March TA Appendix Q “**Weekdays**”, compressing into reduced hours, but lower total count DESPITE 13% uplift (for 31kte to 35kte).
- Column 3: Vectos March TA text “**Table 5.1**”, apparently arbitrary massive change in counts said to be due to change to vehicle length DESPITE columns headed OGV1 and OGV2.
- Column 4: Vectos December Appendix Q “**Dev Flows**”. This appears to reflect March Table 5.1 with tweaks. The latest Appendix Q (29.1.21) is essentially identical, so not in the spreadsheet above.
- Column 5: Column 1 TSL survey data, but time-compressed by NAG – NOTE with appropriate peak hour counts.
- Column 6: NAG Column 5 data, uplifted by 13% (for 31kte to 35kte).
- Column 7: NAG Column 6 data, again uplifted, for no HGVs over 10metres length (effectively 32tonne gwv).
- Column 7b. Note school peak travel time counts.

## Appendix B1:

Page 1 of the applicant's TSL survey evidence provided at public consultation in December 2019.

Note: "Southwark Metals – 120 vehicles per day on weekdays". In the style of all subsequent applicant documents this is 240 vehicle movements.

This total is not explained, but possibly as surveyed then factored-up from 31kte to 35kte. 240 is higher than in any subsequent table in the application.

URBAN & PROVINCIAL

Southwark Metals

windsorgrove

## TRANSPORT

In order to establish the potential impact of the proposed development, reference has been made to surveys of the site when it was occupied by West Norwood Car Breakers and further surveys at Southwark Metals existing depot in Southwark. Consideration has also been given to the levels of traffic that could be attracted to the site in the event that its current permit for 25,000 tonnes per year was fully utilised; West Norwood Car Breakers only processed a small percentage of this figure.

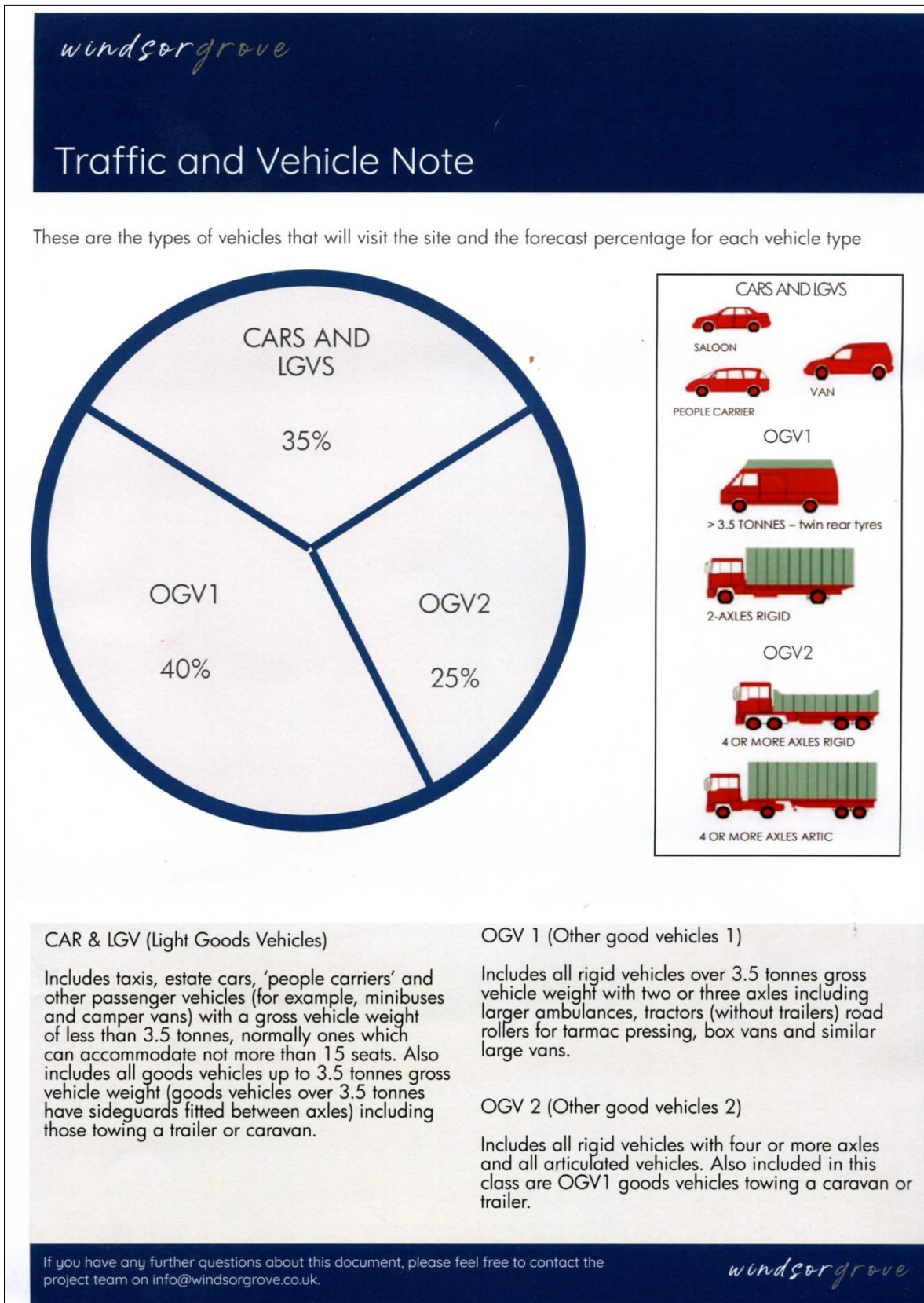
Having regard to the above, the following sets out typical vehicle movements for the three separate scenarios:

- West Norwood Car Breakers – 10 vehicles per day on weekdays and Saturdays.
- Permitted Use - 70 vehicles per day on weekdays and 40 vehicles per day on Saturdays.
- Southwark Metals - 120 vehicles per day on weekdays and 70 per day on Saturdays.

PROPOSED HGV ROUTES

## Appendix B2: Split by Vehicle Type

Page 2 of the applicant's TSL survey evidence provided at public consultation in December 2019. Of the total, 25% are OGV2. These are 4-axle or more, as well as all trailer units and artics. Most OGV2 are 32tonne gvw and heavier.



Appendix C:

In the last line below is evidence given on behalf of Southwark Metals to Southwark Council's Old Kent Road Business Network regarding alternative sites for Southwark Metals' then Ruby Triangle operation.

What is the name of your business?	What is your business address?	What is your main business activity?	Have you answered no, or have you answered no, please give your reasons	Could your business operate within a mixed use area that also accommodated new homes?	If you answered no, please give your reasons	What type of premises would you require?
Timothy Taylor	Unit 8 Admiral Hyson Industrial Estate, Hyson Road. London, SE163PA	Storing, packing, displaying huge artworks		Yes		Industrial/warehouse building - ground floor modern business
Event Concept	B3/4 Galleywall Trading Estate, Galleywall Road, London SE16 3PB	Event Design, production and management		No	24 hour business, moving trucks and heavy equipment	Industrial/warehouse building - ground floor with suitable
Press Play Studio	Unit 13 The Penarth Centre Ormside Street SE15 1TR	Music production rental of three music production spaces three independent businesses.	one on one clients at our i. There would be no int.	No	Noise and unsociable business hours would cause problems in a mixed use area	Music studio
Record Street Music	Unit 13 Penarth Centre Ormside St SE15 1TF	Music production	business has no it - it's not what	No	Often people don't like loud music	Industrial/warehouse building - ground floor with suitable artist studio, music
Southwark Metals Ltd	1 Ruby Triangle SE15 1LE	Scrap metal		No	Noise heavy lorries	Yard - with no land a small building