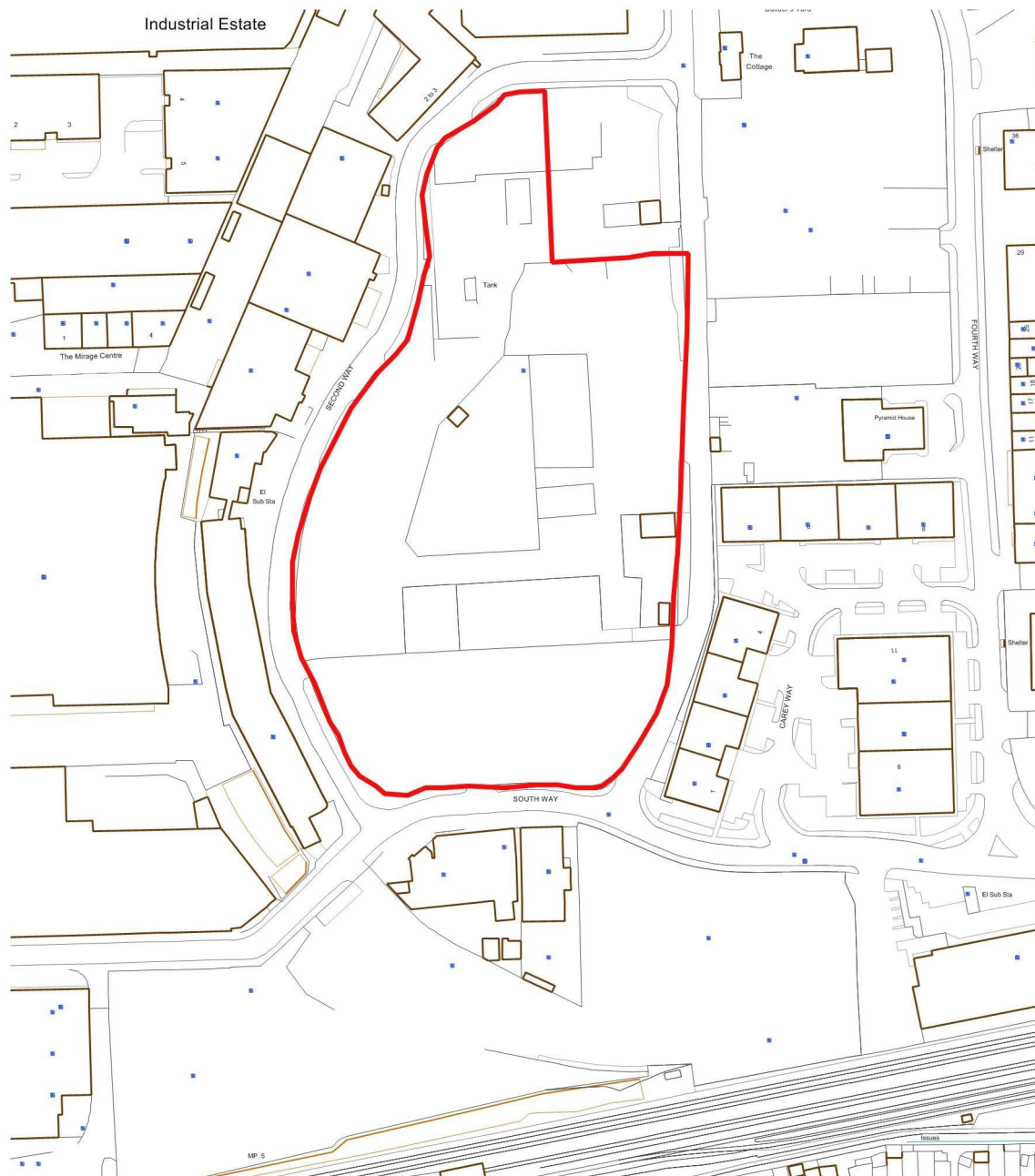




Planning Committee Map

Site address: 30 Second Way, Wembley

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This map is indicative only.

RECEIVED: 26 September, 2013

WARD: Tokyngton

PLANNING AREA: Wembley Consultative Forum

LOCATION: 30 Second Way, Wembley

PROPOSAL: Erection of a Costco warehouse club (Sui Generis), including a tyre installation centre, sales and associated facilities including parking, landscaping, servicing arrangements and access to the highway.

APPLICANT: Costco Wholesale UK Ltd & Quintain Wembley Trading Estate Ltd

CONTACT: CgMs

PLAN NO'S:
See condition 2.

RECOMMENDATION

To resolve to grant planning permission subject to referral to the Mayor of London and subject to the completion of a satisfactory Section 106 or other legal agreement and delegate authority to the Head of Area Planning or other duly authorised person to agree the exact terms thereof on advice from the Director of Legal Services and Procurement.

SECTION 106 DETAILS

The application requires a Section 106 Agreement, in order to secure the following benefits:-

1. Payment of the Council's legal and other professional costs in a) preparing and completing the agreement and b) monitoring and enforcing its performance
2. The developer shall give 28 days notice of the intention to commence development;
3. A detailed 'Sustainability Implementation Strategy' shall be submitted to the Local Planning Authority and approved in writing prior to the commencement of the development hereby approved. This shall demonstrate how the development will achieve:
 - a. a minimum of BREEAM "Excellent" (submission of a design stage assessment by a BRE approved inspector) or other rating as is approved in writing by the Council and is the maximum feasible; or
 - b. How the indicated Brent Sustainability Checklist measures will be implemented within the scheme (or other such measures approved by the Council which meet a level of at least 45%).
 - c. How the scheme will achieve a minimum CO2 reduction of 25 % from 2010 TER (regulated) including a minimum of reduction of 5 % through on-site renewables (after "be lean" and "be clean" measures have been applied);
 - d. That the scheme can be connected to a district wide heat network, should one come forward in the future.
4. The developer shall adopt adequate procurement mechanisms to deliver the commitments set out in the strategy.
5. No more than three months after practical completion, independent evidence (through a BRE Post-Construction Review and completion certificates) shall be submitted on the scheme as built, to verify the achievement of at least BREEAM "Excellent" (or other level as has been agreed by the Council).
6. If the evidence of the above reviews shows that any of these sustainability measures have not been implemented within the development, then the following will accordingly be required:
 - e. the submission and approval in writing by the Local Planning Authority of measures to remedy the omission; or, if this is not feasible,
 - f. the submission and approval in writing by the Local Planning Authority of acceptable compensatory measures on site; or otherwise pay to the Council a sum equivalent to the cost of the omitted measures to be agreed by the Local Planning Authority, to be used by the Council to secure sustainability measures on other sites in the Borough.

7. The implementation of the approved Travel Plan from first occupation of the building, the purpose of the plan being to manage the transport needs of the Development so as to minimise car usage and promote alternative modes of transport.
8. The developer shall:
 - g. Prepare and gain approval of a "Employment, Enterprise and Training Plan" covering both construction and ongoing opportunities in accordance with the Council's Guidance prior to commencement and to implement the Plan.
 - h. Use reasonable endeavours to ensure that, during construction, their contractors:
 - i. Offer an interview to any construction job applicant who is a resident in Brent and meets the minimum criteria for the job
 - ii. Use reasonable endeavours to: achieve 1 in 10 of the projected construction jobs to be held by Brent residents and for every 1 in 100 construction jobs to provide paid training for a previously unemployed Brent resident or Brent school leaver for at least 6 months
 - iii. From material start, to provide monthly verification of the number of Brent Residents employed or provided training during construction and if the above targets are not being met, to implement measures to achieve them
 - iv. Prior to occupation, verify to the Council the number of Brent Residents employed during construction and unemployed/school leavers who received training.
9. That the works to the public highway, namely the formation of new accesses to the highway, installation of suitable signage, reinstating existing redundant accesses and alterations to the junction of Third Way and South Way to reduce the kerb radii, shall be undertaken at the developer's expense pursuant to an agreement under Section 278 of the Highways Act 1980.
10. Costco commit to the following operational restrictions:
 - i. Both parties to the agreement acknowledge that the application is proposed on the basis that approximately 65% of annual turnover will be to trade members of the warehouse club.
 - j. The warehouse club will restrict itself to approximately 4,000 different stock items.
 - k. Those items will be aimed primarily at the trade member and will mainly consist of items packaged in institutional packs or multi-packs or be of an institutional quality.
 - l. The agreement acknowledges that the use of the warehouse club as a Class A1 shop would amount to development requiring planning permission.
 - m. The warehouse club is to be operated in the general manner described in the booklet accompanying the application entitled "Costco Membership Warehouse Club – Its Philosophy and Operation".
 - n. An annual membership system is to be operated, requiring the payment of a fee and goods can only be bought by members in possession of a membership card which includes a photograph of themselves and their signature.

And, to authorise the Head of Area Planning, or other duly authorised person, to refuse planning permission if the applicant has failed to demonstrate the ability to provide for the above terms and meet the policies of the London Plan 2011, Local Development Framework Core Strategy 2010, Unitary Development Plan 2004 and Section 106 Planning Obligations Supplementary Planning Document by concluding an appropriate agreement.

CIL DETAILS

This application is liable to pay the Community Infrastructure Levy (CIL). **£409,516.88** is Brent CIL and **£1,028,383.18** is Mayoral CIL.

CIL Liable?

Yes/No: Yes

EXISTING

The subject site comprises 2.6 hectares of land situated to the north of South Way and the east of Second Way. The majority of the site was previously used as a bakery. However, the use ceased in around 2002 and the buildings were demolished to slab level in 2009. The buildings on the southern element on the site were demolished approximately 8-10 years ago.

The site is situated within a designated Strategic Industrial Location. It is not within a Conservation Area or within the curtilage of a listed building.

DEVELOPMENT SCHEDULE

The table(s) below indicate the existing and proposed uses at the site and their respective floorspace and a breakdown of any dwellings proposed at the site.

Floorspace Breakdown

Primary Use	Existing	Retained	Lost	New	Net Gain
sui generis	0		0	27882	27882

TOTALS in sqm

Totals	Existing	Retained	Lost	New	Net gain
	0		0	27882	27882

Monitoring Residential Breakdown

Existing

Description	1Bed	2Bed	3Bed	4Bed	5Bed	6Bed	7Bed	8Bed	Unk	Total
-------------	------	------	------	------	------	------	------	------	-----	-------

Proposed

Description	1Bed	2Bed	3Bed	4Bed	5Bed	6Bed	7Bed	8Bed	Unk	Total
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PROPOSAL

Permission is sought for the construction of a retail warehouse club with a floor area of approximately 13,000 square metres together with a 440 square metre tyre sales centre within a 14 m high building. Parking for 519 cars is proposed, including 16 disabled bays. Vehicular access is proposed from South Way and Second Way, with servicing access from Second Way. Cycle parking for 60 bicycles is proposed.

HISTORY

No relevant planning history.

POLICY CONSIDERATIONS

NATIONAL

National Planning Policy Framework

REGIONAL

The Mayor of London
The London Plan 2011

The revised London Plan was adopted in July 2011 and sets out an integrated social, economic and environmental framework for the future development of London. Relevant Policies include:

- 2.17 Strategic Industrial Locations
- 5.1 Climate Change Mitigation
- 5.2 Minimising Carbon Dioxide Emissions
- 5.3 Sustainable Design and Construction
- 5.6 Decentralised Energy in Development Proposals
- 5.7 Renewable Energy
- 5.9 Overheating and Cooling
- 5.10 Urban Greening
- 5.11 Green Roofs and Development Site Environs
- 5.12 Flood Risk Management
- 5.13 Sustainable Drainage
- 5.15 Water Use and Supplies
- 5.21 Contaminated Land
- 6.3 Assessing Effects of Development on Transport Capacity
- 6.9 Cycling
- 6.10 Walking
- 6.13 Parking
- 7.2 An Inclusive Environment

- 7.3 Designing Out Crime
- 7.4 Local Character
- 7.5 Public Realm
- 7.6 Architecture
- 7.14 Improving Air Quality
- 7.15 Reducing Noise

They Mayor's Transport Strategy

Supplementary Planning Guidance – Sustainable Design and Construction (May 2006)

Supplementary Planning Guidance – Accessible London: Achieving an Inclusive Environment (April 2004)

LOCAL

Brent Local Development Framework Core Strategy 2010

- CP 1 Spatial Development Strategy
- CP3 Commercial Regeneration
- CP5 Placemaking
- CP7 Wembley Growth Area
- CP15 Infrastructure to Support Development
- CP16 Town Centres and the Sequential Approach to Development
- CP19 Brent Strategic Climate Mitigation and Adaptation Measures
- CP20 Strategic Industrial Locations and Locally Significant Industrial Sites

Brent Unitary Development Plan 2004

Policies

- BE2 Local Context & Character
- BE3 Urban Structure: Space & Movement
- BE4 Access for disabled people
- BE5 Urban clarity and safety
- BE6 Landscape design
- BE7 Streetscene
- BE8 Lighting and light pollution
- BE9 Architectural Quality
- BE12 Sustainable design principles
- EP2 Noise and Vibration
- EP3 Local air quality management
- EP5 Development affecting existing potentially polluting development
- EP6 Contaminated land
- EP15 Infrastructure
- TRN1 Transport Assessment
- TRN2 Public transport integration
- TRN3 Environmental Impact of Traffic
- TRN4 Measures to make transport impact acceptable
- TRN10 Walkable environments
- TRN11 The London Cycle Network
- TRN12 Road Safety and Traffic Management
- TRN15 Forming an access to a road
- TRN22 Parking Standards – Non-Residential Developments
- TRN31 Design and land take of car parks
- TRN34 Servicing in new developments
- TRN35 Transport access for disabled people & others with mobility difficulties
- Appendix TRN2 Parking and Servicing Standards
- WEM14 Stadium Access Corridor

Brent Council Supplementary Planning Guidance and Documents

- SPG12 Access for disabled people
- SPG17 Design Guide for New Development
- SPG19 Sustainable design, construction and pollution control
- SPD Section 106 Planning Obligations

SUSTAINABILITY ASSESSMENT

The application is accompanied by a Sustainability assessment and Energy statement which demonstrate how the proposal complies with the policies relating to sustainability within the London Plan, LDF Core

Strategy and Unitary Development Plan.

It demonstrates that the development can achieve a BREEAM rating of "Excellent" in accordance with Policy CP19 of the LDF Core Strategy. It includes an energy assessment which demonstrates that the proposal will achieve a 25.06 % reduction in CO2 over the 2010 Building Regulations Target Emissions Rate, including 5 % through onsite renewables (photovoltaic panels). As the application was submitted prior to 1 October 2013, the target CO2 reduction is 25 % rather than 40 %. The inclusion of Combined Heat and Power was considered. However, this was not considered feasible due to the small heat load associated with the building. The applicants have demonstrated that the building can be connected to a district-wide heat network should one come forward in the future by retrofitting heat coils to the high efficiency HVAC units which will heat the building prior to such installation. The proposal is considered to comply with the Mayor's energy hierarchy and the targets for CO2 reduction set out within the London Plan. The application is also accompanied by a TP6 Sustainability Checklist which achieves a score of 47 %. The applicant suggests that a target score of 45 % is secured. Given that a number of categories are not applicable due to the nature of the proposal and location (sections 1.2, 3.1a, 3.1b-c, 4.7f, 6.4k), your officers agree that a target score of 45 % is appropriate.

The proposal is considered to comply with the policies regarding sustainability contained within the London Plan, Brent LDF Core Strategy 2010 and the Brent UDP 2004.

CONSULTATION

Letters sent: 2 October 2013
Site Notices: 30 September 2013
Press Notice: 3 October 2013

Letters were sent to 32 adjoining and nearby owners and occupiers.
No letters were received from adjoining or nearby occupiers.

Internal consultees:

Safer Streets / Environmental Health:

No objection. Conditions are recommended relating to contamination.

Highways:

No objection subject to

- the safeguarding of land for highway widening;
- implementation of the interim Travel Plan, Framework Car Park Management Plan, Delivery and Servicing Management Plan and Construction Traffic Management plan
- Minor amendments to the site layout relating to the servicing yard access arrangements, the number of disabled parking spaces and the number of electric vehicle charging points;
- An informative regarding the need to enter into an agreement under S38/S278 of the Highways Act to undertake works within the public highway to form the new accesses and make good the existing redundant accesses;
- An informative regarding the need for the applicant to fund the Council's costs for providing suitable traffic management measures if the applicant requires access to be retained to their site on Wembley Stadium event days when on occasions when certain traffic managements measures are implemented.

External consultees:

The Greater London Authority: Stage 1 response

Whilst the application is broadly acceptable in strategic planning terms, on balance it does not fully comply with the London Plan. Further information / changes are required regarding the following:

Comment	Response
Employment generation (secure firm commitment through condition towards recruitment, training and selection of local staff)	Employment, Enterprise and Training Plan to be secured through Section 106.
Inclusive access (details on how disabled visitors and staff would be evacuated in an emergency, and provisions for those with hearing and sight impairments)	Further details are to be provided and discussed in the supplementary report.
Transport (information/justification for the level of parking, trip rates, car park)	Further information has been provided. TfL have indicated that they are happy with the

management, blue badge parking and electric vehicle charging points, additional highway modelling, pedestrian audit and revisions to the travel plan)	additional and revised information subject to Brent Highway Service's views on stadium event day highway management.
Energy (demand for cooling, modelling sheets, how the building could be connected to a district wide heat network in the future)	Additional information provided.

Thames Water

TfL recommend that a Grampian condition is attached regarding the approval of a drainage strategy and informatives regarding surface water drainage, sewers crossing the site, the need for a trade effluent consent and the use of petrol / oil interceptors.

Environment Agency

The Environment Agency find the proposed development acceptable subject to conditions regarding the approval of a surface water drainage scheme based on the submitted Flood Risk Assessment.

Wembley National Stadium Limited

In principle, WNSL welcome the proposed development and the arrival of CostCo to the Wembley Area. However, WNSL would like to comment on Stadium event day arrangements.

Comment	Response
An analysis of traffic management control measures is required to ensure that CostCo traffic does not adversely affect stadium traffic on event days. It may be that the South Way entrance should be closed for specific periods, staff required to redirect or people and/or CSAS staff	See paragraph [X]
The Transport Assessment does not address the increased demand on the capacity of the roads servicing the development on stadium event days	Highways consider that the proposal will be acceptable on event days subject to the implementation of specific management arrangements which are recommended to be secured through condition.
If the Council is minded to grant planning permission, WNSL recommend that conditions are attached requiring a Stadium Event Day Traffic and Parking Management Strategy	Please see conditions [X]

REMARKS

Principle of the use and employment benefits

- (1) The proposal is within a designated Strategic Industrial Location (SIL) which are primarily protected for industrial and warehousing uses (Use Class B1c, B2, B8) and other related Sui Generis uses. This designation looks to ensure that the sufficient land remains available to meet the current and future requirements for such uses and to ensure that those uses take place in locations where they are less likely to affect sensitive uses (e.g. homes).
- (2) A full and detailed discussion of the proposed use was included within the Stage 1 Report prepared by the GLA officers for the Mayor of London and this has been appended to this report. Your officers concur with the Mayor of London's views on the appropriateness of the use.
- (3) The GLA comments are summarised as follows:
 - Principle of use
 - The proposal combines bulk storage and distribution (Use Class B8), which is appropriate to a SIL, with a substantial volume of direct sales on site.
 - The direct bulk sales distinguish the Costco operation from that of a conventional warehouse;
 - As the predominant activity would be the sale of good and services, the application should be considered against the advice provided in the NPPF, particularly in terms of the sequential location and the potential impact on the Wembley Town Centre

- The sequential test of location
- The application site is considered to be “out-of centre” and as such, considered to be a last resort for high trip generating retail uses
- Secretary of State decisions have upheld the principle that the retail elements cannot be disaggregated and given Costco’s normal trading format, the sequential test would normally be limited to sites of 4-5 hectares;
- This has been expanded to sites of 2-4 Hectares and 10 sites were considered.
- None of the sequentially preferable sites were found to be suitable, viable or available to accommodate the proposed Costco store.
- Impact on town centres
- The impact assessment primarily focused on the potential impact on Kilburn, Wembley, Cricklewood and Willesden Green with regard to comparison shopping and Queensbury (Morrisons), Colindale (Asda), Wembley (Asda), Brent Cross (Tesco), Brent Park (Tesco) Kilburn (Sainsburys) and Park Royal (Asda) for convenience shopping.
- A clear distinction is made between the retail shopping functions of town centres and the services offered by Costco which is restricted to trade and individual members.
- Planning case law has established a warehouse club offering members who pay an annual subscription, stocked a limited amount of products from a wide variety of categories, at low prices, but only in bulk quantities was not ‘a shop’ in the statutory definition ‘for the retail sale of goods’ to visiting members of the general public because it was not open to the public only to club members. It was considered appropriate to grant planning permission even though a retail use would not have been acceptable in that location.
- It has also been established through case law that the impact assessment should only apply to the element of trade associated with individual members (35 % of turnover), compared to 65 % for trade members).
- The broad range but limited depth of goods sold at Costco (3,500-4000 items compared with 30,000 to 40,000 sold at a typical supermarket) means that Costco stores are likely to draw a small amount of trade from a wide range of businesses and that they are more likely to compete with other cash-and-carry warehouses than retail shops in town centres.
- Previous decisions by the Planning Inspectorate and conclusions drawn by the Secretary of State have concluded that Costco Stores are unlikely to have any discernible impact on the vitality and viability of town centres in the relevant catchment areas.

(4) Employment

- The submitted reports specify that over 90 % of the jobs created by a new Costco warehouse are filled by locally recruited staff. In a survey of two stores, 70 % of the staff lived in the same or adjacent postcode districts to the buildings.
- Typically 53 % of Costco jobs are full time, and part-time workers are guaranteed a minimum of 25 hours per week (85 % FTE);
- 160 job are initially envisaged, rising to 250 within 3-5 years.
- Costco has indicated that it is willing to work with Brent Council to target the store’s recruitment to local areas.

With regard to Employment, it is proposed that the approval and implementation of an Employment, Enterprise and Training Plan is secured through the Section 106 agreement.

Design and landscaping

- (5) The site is situated within the Wembley Industrial Estate and as such, the surrounding buildings are of variable architectural quality. Nevertheless, the site adjoins the primary vehicular route to the Stadium and the Wembley Growth Area and as such, your officers expect proposals for new buildings to contribute positively to the streetscene.
- (6) Given the size of the building and the nature of the use, the format of the building reflects a large industrial shed. However, the glazed lobby and large canopy feature highlights the entrance to the store on the south-western corner of the building. The two primary street facing facades (southern and western) are broken down through the use of what the architects refer to as “picture frame borders” surrounding the cladding panels which create a grid pattern on these facades. The northern and eastern elevations are less detailed, with the appearance of a typical warehouse.
- (7) A significant amount of planting is proposed around the southern and western fringes of the site, along the boundary with South Way and Second Way. This will have a significant positive impact on the streetscene.
- (8) Whilst the building is sited within an industrial estate, your officers seek to ensure that it makes a positive

visual contribution to the route to the Stadium and Growth Area. The proposed building and associated landscaping is considered to be of sufficient quality to ensure that the scheme will make such an improvement.

- (9) Access from the car park to the store, situated on the first floor, is to be provided via stairs, ramps and two lifts, ensuring that any disabled staff or customers can access the store adequately. The design and access statement confirms that there will be flat or ramped access points to all areas of the warehouse, accessible car parking spaces, wide circulation aisles and till arrangements suitable for use by disabled staff. The GLA requested further information regarding emergency egress for disabled visitors and staff in the event of an emergency together with details of the provisions for those with hearing and sight impairments. Your officers are awaiting further information from the applicant and will provide further information on these points within the Supplementary Report.

Highways

(10) Parking and servicing

- (11) The Parking Standards allow up to a maximum of 520 spaces for a store of this size and the proposed provision of 503 standard sized spaces accords with the Council's standards. A total of 16 disabled parking bays have been detailed on the drawings. This falls below the Council's standards which require 5 % of the total (26 spaces). As such, a condition has been recommended to address this. Electric vehicle charging is required at a rate of 10 % with active and 10 % with passive charging points. The Car Park Management Plan confirms that these will be provided and your officers also recommend that they are secured by condition.

- (12) A total of 60 cycle parking spaces is proposed. This falls between the standards for food and non-food retail which would require 44 to 104 spaces. Given the nature of the use, the proposed provision is considered to be acceptable.

- (13) A Framework Car Parking Management Plan has been submitted which proposes measures for addressing parking on Stadium event days. This includes:

- Closure of the main South Way access into the site for a two hour period before the start of a Stadium event and to redirect traffic into the car park via Second Way, thus ensuring that queuing into the car park does not interfere with traffic flow along South Way;
- Manual checks of membership cards to be undertaken at the car park entrance by store staff;
- Parking within the car park will be limited to a maximum duration of 90 minutes, after which a penalty charge will apply.

- (14) The proposed measures are considered to be suitable as a means of ensuring the car park is kept clear of Wembley Stadium visitors.

- (15) Servicing is proposed on the northern side of the building, with four loading bays indicated on the drawings. However, the service yard is sufficiently sized to accommodate 7 vehicles without obstructing access and egress and as such, the proposal accords with the Council's servicing standards. The Transport Assessment and Delivery and Servicing Management Plan set out that the store will receive approximately 15 deliveries between 5 am and 10 am of which 10 would be by articulated lorry. Highways have recommended that the parapet height for the service bay ramp is limited to 1 m in height to ensure that safe access to the servicing bay.

(16) Access

- (17) Three vehicular access/egress points are proposed, two from Second Way and one from South Way. The South Way point provides both access and egress while separate access and egress points are provided from Second Way. Access and egress to the servicing yard is provided from Second Way. Revisions were made to the layout following comments from Highways to limit the potential for queue to form on South Way. The security gates that are proposed are set sufficiently into the site to allow a car to stand clear of the highway. It is also essential that these are open during opening hours. This can be controlled through the parking management plan.

- (18) Given the one-way nature of South Way and Second Way, the site must be accessed from the south involving a right turn from South Way. However, during some events, South Way is operated as a two-way street during stadium dispersal. Unless alterations are made to the traffic management arrangements for the surrounding streets, the store will be inaccessible during these times.

- (19) The Council has a long term aspiration to convert both South Way and Second Way to two-way streets as part of the Wembley Area Action Plan proposed. This will require land from the southern and western

sides of the site to be dedicated as public highway, which can be undertaken through Section 72 of the Highways Act. The applicant has amended the landscaping and parking/access arrangements within the site to accommodate the extent of land that Highways have specified is necessary. Your officers are in discussion with the applicant regarding the land required for future highways works and further information will be provided within the supplementary report.

(20) If Second Way is not converted to two-way flow in the short term, access to the store can only be guaranteed at all times if additional temporary traffic management arrangements are added to existing Wembley Stadium traffic management arrangements. This would entail coning a 'contraflow' southbound access lane for the use of traffic to the store along Second Way. The cost would need to be funded on an event-by-event basis by the applicant and is likely to cost approximately £500 per occasion.

(21)

(22) The developer will need to enter into a S38/S278 Agreement with Brent Council's Transportation Unit to form new accesses, close all existing redundant accesses and potentially dedicate land as public highway if they intend to carry out the works themselves. An informative is recommended to highlight this. New accesses to the site will require suitable raised entry treatments (for the car park) and tactile paving, together with suitable signage at all egresses for one-way traffic.

(23) Alterations to the junction of Third Way and South Way in the south-eastern corner of the site to reduce the kerb radii to make the crossing of the junction far more pedestrian friendly (given the increased footfall likely in the area arising from this store) should also be undertaken as part of the access works.

(24) Pedestrian access is proposed from South Way and Second Way, leading to the ramps and lifts to the first floor entrance.

(25) Traffic impact

(26) Modelling has been undertaken to assess the potential traffic impact of the proposal. It is predicted that the impact on weekday morning peak hour traffic is negligible due to the opening hours of the store. However, during the weekday evening peak 185 arrivals and 195 departures are predicted whilst on a Saturday afternoon peak 371 arrivals and 347 departures are predicted. The modelling also suggest that the development will increase flows by a significant degree (i.e. >5%) on road links as far a field as the Empire Way corridor to the west and North Circular Road to the east. Potentially severe capacity problems have been highlighted at the junctions of South Way/Wembley Hill Road and Fulton Road/Empire Way in their existing layouts, once traffic from this development is added to existing baseline and committed development traffic in the area.

(27) To address such issues, the Council's Wembley Masterplan and associated Transport Strategy Review for the area have identified the need for a range of improvements to the transport network across the whole redevelopment area. These include major schemes to reconnect North End Road to Bridge Road to provide an additional traffic route into the area from the west and major improvements at Wembley Hill Road/South Way/Harrow Road to relieve an existing bottleneck, as well as various other more localised junction improvement schemes and numerous other improvements to sustainable transport facilities. It should be noted that the Wembley Masterplan has been based on modelling that does not include the Costco store. Improvements to some of these junctions (e.g. South Way / Wembley Hill Road and Fulton Road / Empire Way) have been secured through other extant consents (the Quintain "North West Lands" consent ref 10/3032 for the land surrounding the Civic Centre and the consent for the land next to Wembley Stadium Station ref: 04/0379).

(28) Road Safety

(29) Highways have examined accident records in the vicinity of the site, with 14 personal injury accidents identified around the Wembley Industrial Estate one-way system in the three year period leading to October 2013. This includes two accidents involving pedestrians being hit by reversing cars along South Way (one at the junction with Second Way and one at the junction with Carey Way). As above, consideration needs to be given to ensuring that pedestrian safety improvements are made in the immediate vicinity of the site, given the likely increase in pedestrian movement by staff to and from the site.

(30) Travel Plan

(31) An interim Travel Plan has been submitted which focuses on dealing with staff transport to the site given the nature of the use where customers will need to travel by vehicle. This has been assessed and awarded a PASS rating. It is recommended that this is secured through Section 106.

(32) Construction

(33) A Construction Traffic Management Plan has been submitted which Highways consider is acceptable. A Construction Method Statement is also required and is recommended to be secured through condition. This will need to cover matters such as how and when traffic will be directed to the site, including event day arrangements, and environmental matters (such as the control of dust).

Summary

- (34) The proposed retail warehouse club is considered to be acceptable within this Strategic Industrial Location due to the nature of the use and restriction on the way that it operates. This has been established within decisions taken by the Planning Inspectorate and Secretary of State in relation to previous Costco applications elsewhere in the country. It will result in a significant number of additional jobs within Brent (approximately 150, rising to 260) and the applicant is willing to work with the Council to maximise the benefits of the store for local employment. The design of the building together with the extent of planting along the edge of the street frontages is considered to be appropriate given the location of the site on the main vehicular route to the Stadium and Wembley Growth Area.
- (35) The proposed access and egress arrangements, total number of parking spaces, and cycle storage facilities are considered to be acceptable. However, additional wheelchair accessible parking spaces are recommended to be secured through condition. The proposed warehouse club is likely to result in a significant increase in traffic flow at peak times and this may result in potentially severe capacity issues at the junctions of South Way / Wembley Hill Road and Fulton Road / Empire Way in their existing layouts. However, improvements have been identified to these and other junctions in the area through the Wembley Masterplan and some of the key improvements have been secured through other extant consents.
- (36) The proposal is considered to accord with the Council's planning policies, the London Plan and the National Planning Policy Framework and approval is recommended subject to a Section 106 legal agreement and the stage 2 referral to the Mayor of London.

Extract from the Greater London Authority Stage 1 report

(37) Land use policy, regeneration and the principle of use

- (38) *The application site and its immediate surrounding are identified in the London Plan as a Strategic Industrial Location (SIL) within the Wembley Opportunity Area. The former designation provides a means of ensuring that an adequate reservoir of land remains available to meet the future industrial requirements of London; the latter identifies brownfield areas with the potential to accommodate significant amounts of additional new housing and employment opportunities linked to existing or potential improvements in public transport accessibility.*
- (39) *Inherent in the proposal to change the designated use of land from traditional industrial/warehousing employment (classes B1 c, B2 and B8) to a warehouse club (sui generis) is a presumption against the redevelopment of SILs for uses that do not fall within the business class, unless it is part of a strategically coordinated process of mixed-use intensification. London Plan policy 2.17 (Strategic Industrial Locations) specifically states that development of non-business uses within SILs should be resisted, except where they provide local, small-scale 'walk to' services for industrial occupiers, e.g. workplace crèches or cafes.*
- (40) *23 At the local level, policy CP7 of the Brent Core Strategy affirms the status of Wembley as a 'Growth Area' to drive the economic regeneration of Brent by generating 10,000 new jobs across a range of sectors, including retail, offices, conference facilities, hotels, sports, leisure, tourism and other visitor attractions. Policy CP16 adds that the Council will promote Wembley as the preferred destination for major new retail, leisure and other town centre development.*
- (41) *With respect to SILs, policy CP20 affirms the Councils resolve to protect Strategic Industrial Locations designated for industrial employment uses, characterised by use classes B1, B2 and B8; or sui generis uses that are closely related, having regard for the provisions of Preferred Industrial Locations and Industrial Business Parks within the London Plan.*
- (42) *The application site is part of the 10.21 –hectare Wembley Industrial Estate identified in the Wembley Area Action Plan (WMP) as site W29 (Second Way), wherein the uses considered suitable (in line with policy CP 20 of the Core Strategy) include offices, light industrial and higher value general industrial; utility and transport functions; wholesale markets, small scale distribution and sui generis uses that are closely related. The WAAP describes the site as the 'Eastern Gateway' to the Stadium, stating that it*

should continue to provide jobs whilst capitalising on the development potential of industrial plots; however, it also proposes a change to the Proposals Map designation of this SIL from its Preferred Industrial Location category to an Industrial Business Park, in order to accommodate uses, such as research and development laboratories, that require a higher quality specification or environment.

(43) From a strategic perspective, the referred application raises the question of whether the proposed Costco store would match the employment potential of a 'traditional' industrial development in terms of the number, type, range and quality of new jobs likely to be generated. If it would not, then the proposal would contribute to the gradual erosion of London's strategic reservoir of industrial land and result in a permanent loss of opportunity to maximise the employment potential of a designated industrial site.

(44) In this instance, the proposal would combine bulk storage and distribution (class 88), which is appropriate to an SIL, with a substantial volume of direct sales on the site. It is these direct bulk sales which distinguish a Costco operation from that of a conventional warehouse, where distribution is generally carried out by the operator; however, as the predominant activity would be the sale of goods and services, the subject application should be considered against the advice provided in the NPPF, particularly in terms of the sequential location test and potential impact on Wembley town centre.

(45) The sequential test of location

(46) The application site falls outside the boundaries of Wembley's 'major' town centre, with its core on Wembley High Road; and its 'district' centre, situated to the west of Wembley Stadium; although proposals are underway to merge these two into a single centre linked by a new boulevard.

(47) For high trip-generating developments involving direct sales, the NPPF and London Plan accord first preference to town centre locations; followed by edge-of-centre sites with good links to the centre. Out-of-centre locations are considered as a last resort, with preference given to sites that are accessible or likely to be accessible by a choice of means of transport. It is implicit in this that developers are expected to be flexible about the format of their businesses and to disaggregate its one or more components wherever it practical to do so.

(48) In the case of Costco proposals, however, the Secretary of State's decisions relating to sites at Chingford, Oldham, Reading and Chester, have upheld the principle that 'warehouse clubs' comprise warehousing as well as retail elements that cannot be disaggregated. It follows from this that Costco's normal trading format is generally accepted and that sequential tests for new developments would normally be limited to sites of 4-5 hectares, capable of accommodating their typical 13,500 sq.m. stores and a commensurate amount of parking space required to transport bulk goods for its majority of trade members. Inevitably, this restricts the choice of potential locations.

(49) A specialist retail report submitted in support of the application indicates that in view of the proposal to accommodate parking beneath the store, the sequential test could be expanded to include sites of 2 hectares rather than 4 hectares, with a store catchment area of 20 to 30 minutes drive. A total of 10 sites were subsequently considered on the basis of their suitability, economic viability and availability for development within a reasonable timescale. The sites ranged from 1.9 to 5 hectares in size and included a 2.1 hectare edge-of-centre site at Hindes Road / Station Road in Harrow; and two edge-of-centre sites on the Colindale Retail Park and at the Capitol Way/Edgware Road junction in the Colindale/Burnt Oak Growth Area of Brent. All three were in active use, with planning permission for new development and Council policy aspirations for regenerative uses that did not include a warehouse club restricted to members rather than the general public.

(50) The remaining seven sites were all in the Wembley Growth Area. Most of them were in edge-of-centre locations and had policy designations for specified uses associated with the comprehensive master planning of an integrated town centre; or were in multi-ownership, with active uses or restrictions (such as nature conservation interests or listed buildings) that significantly reduced their net developable area. In essence, none of sequentially preferable the sites considered were found to be suitable, viable or available to accommodate the proposed Costco store; hence the applicant's subsequent decision to choose an out-of-centre location.

(51) It is evident from the preceding paragraphs that the format of Costco stores requires relatively large sites, of which there are not many within or on the edge of local town centres. Impact on town centres

(52) The NPPF requires an assessment of the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and the impact of the proposal on town centre vitality and viability including local consumer choice and trade in the town

centre and wider area up to five years from the time the application is made.

- (53) *Within the catchment area subject to the retail study, the centres found to enjoy the largest comparison goods market share were Kilburn, Wembley, Cricklewood and Willesden Green; whilst outside the study area considerable expenditure was found to leak into Harrow, Watford (which has the nearest Costco store) and the West End. For convenience goods, the most significant centres/outlets include Morrison's at Queensbury, Asda Colindale, Asda Wembley, Tesco Brent Cross, Tesco Brent Park in Neasden, Sainsbury's Kilburn and Asda Park Royal.*
- (54) *In terms of potential impact on those centres, a clear distinction is made between the retail shopping functions of town centres and the services offered by Costco outlets. Membership of the latter is restricted to businesses (trade members) and to individuals (individual members) who fall within specified groups. It has subsequently been established in planning case law (Thurrock Borough Council and another ex parte Tesco Stores Ltd et al) that a warehouse club offering members who pay an annual subscription, stocked a limited amount of products from a wide variety of categories, at low prices, but only in bulk quantities was not 'a shop' in the statutory definition 'for the retail sale of goods' to visiting members of the general public because it was not open to the public only to club members. Consequently, it was held that it was entirely appropriate for the Borough Council to grant planning permission in circumstances where consent for a retail use would not have been forthcoming.*
- (55) *On trade draw, it is clear that the trade patterns of Costco differs from that expected of a retail store in that it does not attract passing trade; individual members are unlikely to use it for their weekly or top-up shopping, due to the shallow range of products on offer; and its price saving on bulk purchases, rather than locality, is a more determining factor for trade draw.*
- (56) *In a call-in inquiry for a Costco store in Chester in 2004, the Secretary of State affirmed that Costco is both a wholesale (Use Class B8) function and a retail outlet (Class A1). Trade members are the most important membership category for Costco Wholesale, accounting for approximately 65% of the turnover of a typical UK warehouse. As such it is also established in case law that only the individual member spend, which accounts for the remaining 35% of turnover, is required to be tested against retail planning policy tests.*
- (57) *The base year for the impact assessment of Wembley Costco is 2013. Whilst the store is not expected to open for business until 2015 and should take 3-5 years to mature; 2016 has been adopted as the design year in the interests of a more robust assessment. With a calculated turnover for the proposed store of £16.96 million, based on the company's accounts and the average turnover of a Costco warehouse in the UK, some £26.94 million is accounted for by individual members (with 80% drawn from the adopted catchment area). To place this in context, the individual member turnover can be compared to a growth in available expenditure of £259.36 million over the period 2013 to 2016. Thus, at worst, Costco will account for 8% of the growth in available expenditure or just 0.71% of the total available expenditure in 2016 (£3,033.35 million). In these respects, it is evident that the proposed warehouse is unlikely to have an adverse impact on the turnover of existing shopping centres within the catchment area.*
- (58) *Although there is some overlap with local shopping centres in the type of goods and services available to Costco members on a retail basis, empirical evidence indicated that they formed a relatively small proportion of the club's overall turnover. In a 1993 study of warehouse clubs, Verdict observed that the broad range (3,500-4,000 items compared to the 30,000 to 40,000 items stocked by a typical supermarket) but limited depth of goods they offered meant that they were likely to draw a small amount of trade from a wide range of businesses, than to make a massive dent in the trade of any particular outlet. It was estimated that the turnover from fifty warehouse clubs represented only 1.7% of national retail sales. Thus, Goldman Sachs (1993) and Healy & Baker (1994) have both endorsed the conclusion that Costco outlets are more likely to compete with other cash-and-carry warehouses than with retail shops in town centres.*
- (59) *The Inspector into the Gateshead UDP Inquiry which preceded the Costco appeal of 1997, concluded from the evidence of seven existing Costco outlets in the U.K. that the market share for individual members of the club was only 1% of national retail sales and was therefore, unlikely to have any discernible impact on the vitality and viability of town centres within the relevant catchment area. Similar conclusions were drawn by the Secretary of State in relation to all four called-in Costco applications at Chingford, Oldham, Chester and Coventry, to which reference has been made in a preceding paragraph of this report.*

(60) Employment generation

(61) The applicant's planning statement indicates that at 10.6%, the London Borough of Brent has an unemployment rate that is higher than the London (8.9%) and national (7.8%) averages. It also suggests that in the UK overall, over 90% of the jobs created by a new Costco warehouse are filled by locally recruited staff. Thus in a survey of Costco staff, it emerged that in two existing London warehouses analysed, approximately 70% of the staff lived in the same or adjacent post code districts to the building in which they worked.

(62) Typically, 53% of Costco jobs are full-time and part-time workers are guaranteed a minimum of 25 hours per week; which equates to an 85% full time equivalent.

(63) It is envisaged that initial employment at the warehouse would be at least 160 jobs, rising to 250 jobs within 3-5 years as the business matures. The opportunities available would include unskilled/manual, clerical/secretarial, craft and related positions; security, plant and machine operators and others such as opticians, tyre fitters and photographic processors. It is also suggested that 85% of Costco's current managers are staff who have worked their way up from an hourly paid position into management roles, including general managers, heads of departments and supervisors.

(64) Costco has indicated its willingness to work with Brent Council to target the store's recruitment to local areas, in order to ensure that jobs are directed to those in most need and where employment could make the greatest impact on economic regeneration to support the community's needs. This commitment should be secured by an appropriately worded planning condition or legal agreement associated with the proposed development.

RECOMMENDATION: Grant Consent subject to Legal agreement

(1) The proposed development is in general accordance with policies contained in the:-

National Planning Policy Framework
London Plan 2011
Brent LDF Core Strategy 2010
Brent Unitary Development Plan 2004

CONDITIONS/REASONS:

(1) The development to which this permission relates must be begun not later than the expiration of three years beginning on the date of this permission.

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

(2) The development hereby permitted shall be carried out in accordance with the following approved drawing(s) and/or document(s):

(02)01 Rev A
(02)02 Rev B
(02)03 Rev A
(02)04 Rev A
(02)05 Rev A
(02)06 Rev A
(02)08 Rev B
(02)20 Rev B
(03)01 Rev A
(03)02 Rev A
(03)03 Rev A
(04)01 Rev A
(04)02 Rev A
(05)01 Rev A
(05)02 Rev A
(05)03 Rev A

(90)01 Rev A
(90)02 Rev A
(90)03 Rev A
1002 Rev A
2703/EX2 Rev A
2703/EX4

"Landscape Management Plan" dated September 2013

"Landscape Works Specification" dated September 2013

"Costco Wembley Design & Access Statement" dated September 2013

"Costco, Wembley Flood Risk Assessment Report and SUDS (Sustainable Urban Drainage) Strategy" Issue No 2 dated 13 September 2013

Energy statement titled "Second Way, Wembley Proposed Costco Warehouse Club"

Reference P13018.4.1.001 Revision A dated 20 September 2013

Sustainability statement titled "Second Way, Wembley Proposed Costco Warehouse Club" dated 20 September 2013

"Planning Statement" Reference AW/SM/14958 dated 23 September 2013

"Costco Wembley Lighting Scheme Proposal" dated September 2013

"Costco Membership Warehouse, Wembley Transport Assessment" dated September 2013

"Note on car parking provision" dated 22 November 2013

"Interim Travel Plan" dated November 2013

"Framework Car Park Management Plan" dated November 2013

"Delivery and Servicing Plan" dated November 2013

"Technical Note – Highway Impact" dated November 2013

"Framework Construction Traffic Management Plan" dated November 2013

"Noise Assessment for a new Costco Warehouse Club, Wembley" dated 20 September 2013

"Air quality assessment Costco wholesale warehouse, Wembley" reference UK18-19254 dated September 2013

"Phase I & Phase II Environmental Assessment Second Way, Wembley" Reference UK20-18389 dated February 2013

Reason: For the avoidance of doubt and in the interests of proper planning.

- (3) The construction of the development hereby approved shall be carried out in accordance with the Framework Construction Traffic Management Plan dated November 2013 hereby approved unless a revised plan, setting out how deliveries to the land during the construction of the development will be managed so as to optimise traffic operations and minimise disruption as also minimise the environmental impact of freight activity, has been submitted to and approved in writing by the Local Planning Authority and thereafter implemented.

Reason: In the interest of highway flow and safety.

- (4) The Delivery and Servicing Plan dated November 2013 hereby approved shall be implemented in full from the commencement of the use hereby approved unless a revised Delivery and Servicing Plan has been submitted to and approved in writing by the Local Planning Authority and thereafter implemented in full.

Reason: To ensure that the development is sustainable and in the interest of highway flow and safety.

- (5) All existing crossovers rendered redundant by this proposal shall be reinstated to footway at the applicant's own expense and to the satisfaction of the Council's Director of Transportation prior to first occupation of the development hereby approved.

Reason: In the interests of traffic and pedestrian safety.

- (6) Unless otherwise agreed in writing by the Local Planning Authority, the height of the parapets adjoining the ramp to the servicing area shall not exceed 1 m above the height of the relevant part of the servicing ramp.

Reason: In the interest of the safety of servicing vehicles.

- (7) Details of materials for all external surfaces of the building and all other external works (including samples where necessary) and the detailing of the key fixings and junctions

between different materials shall be submitted to and approved by the Local Planning Authority prior to the commencement of works and the works shall be carried out in full accordance with the approved details.

Reason: To ensure a satisfactory development which does not prejudice the amenity of the locality.

- (8) All areas shown on the approved plans shall be suitably landscaped in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority in prior to the commencement of works on that part of the development and the approved details shall be implemented in full. Such landscaping work shall be completed prior to first occupation of the development hereby approved or in accordance with a scheme of works that has been approved in writing by the Local Planning Authority. The works shall thereafter be maintained.

The submitted scheme shall include details of:

- a) the planting scheme for the site, which shall include species, size and density of plants and sub-surface treatments (or planters / green roof substrate profiles where applicable);
- b) walls, fencing and any other means of enclosure, including materials, designs and heights;
- c) treatment of areas of hardstanding and other areas of hard landscaping or furniture, including materials;
- d) details of levels and contours within and adjoining the site;
- e) details of any Sustainable Urban Drainage Measures that are to be incorporated into the landscaping;

The landscaping shall be maintained in accordance with the Landscaping Management Plan hereby approved. Any trees and shrubs planted in accordance with the landscaping scheme and any plants which have been identified for retention within the relevant part of the development which, within 5 years of planting, are removed, dying, seriously damaged or become diseased, shall be replaced to the satisfaction of the Local Planning Authority, by trees and shrubs of similar species and size to those originally planted.

Reason: To ensure a satisfactory standard of appearance and to ensure that the proposed development enhances the visual amenity of the locality.

- (9) Detailed drawings which show the layout of cycle parking areas and details of the cycle stands within the development shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works and the development shall be carried out in full accordance with the approved details and thereafter permanently retained unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure a sustainable development and in the interest of highway flow and safety.

- (10) The development hereby permitted shall not be commenced until a detailed surface water drainage scheme for the site, based on the agreed Flood Risk Assessment (FRA) produced by Quattro Consult ref 4201 Rev 2 dated 19th September 2013 has been submitted to and approved in writing by the local planning authority. The drainage strategy shall include a restriction in run-off and surface water storage on site as outlined in the FRA. The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.

Reason To prevent the increased risk of flooding, to improve and protect water quality, and improve habitat and amenity.

- (11) Unless otherwise agreed in writing by the Local Planning Authority, the this development shall not commence unless a drainage strategy detailing any on and/or off site drainage works for that part of the development has been submitted to and approved by, the Local Planning Authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed unless otherwise agreed in writing by the Local Planning Authority.

Reason: The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

- (12) Details of any external lighting shall be submitted to and approved in writing by the Local Planning Authority prior the commencement of works on the relevant part of the development unless otherwise agreed in writing with the Local Planning Authority. This shall include details of the lighting fixtures and luminance levels. The approved details shall be implemented in full prior to first occupation of the relevant part of the development.

Reason: In the interests of safety and amenity in the area.

- (13) A remediation strategy to mitigate any unacceptable risks posed by identified soil and groundwater contamination on identified receptors shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works and thereafter implemented in full. The strategy shall take into account the findings of any additional investigation and modelling works that are required to delineate the identified contamination.

Reason: To ensure the safe development and secure occupancy of the site.

- (14) A verification report shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the use, demonstrating that remediation has been carried out in accordance with the remediation scheme approved pursuant to condition 14 and the site is permitted for end use.

Reason: To ensure the safe development and secure occupancy of the site.

- (15) Prior to the commencement of works, a Construction Method Statement shall be submitted to and approved in writing by the Local Planning Authority detailing measures that will be taken to control dust, noise and other environmental impacts of the development and the routing and timing of construction vehicles and the approved details shall thereafter be implemented.

Reason: To safeguard the amenity of the neighbours by minimising impacts of the development that would otherwise give rise to nuisance and to mitigate against highways impacts.

- (16) Details of any air-conditioning, ventilation and flue extraction systems including particulars of noise levels and any associated noise mitigation measures shall be submitted to and approved in writing by the Local Planning Authority prior to installation of any such systems. The approved details shall thereafter be fully implemented.

Reason: To safeguard the amenities of the existing or future occupiers.

- (17) Details demonstrating that the developer or constructor has joined the Considerate Constructors Scheme shall be submitted to the Local Planning Authority prior to commencement of works and the developer or constructor shall thereafter adhere to the requirements of the Scheme for the period of construction.

Reason: In the interest of the amenities of the adjoining and nearby owners and occupiers.

- (18) Details of the provision of electric car charging points for a minimum of 20 % of car parking spaces (comprising 10 % equipped with active electric vehicle points and 10 % with passive) shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works and the approved details shall be implemented in full.

Reason: To ensure that the development is sustainable and in the interest of highway flow and safety.

- (19) Details demonstrating that a minimum of 26 disabled parking spaces will be provided within the development be submitted to and approved in writing by the Local Planning Authority prior to the commencement of works and the approved details shall be implemented in full.

Reason: To ensure that the development is sufficiently accessible.

- (20) A detailed car park management plan which shall be in material accordance with the Framework Car Park Management Plan dated November 2013 hereby approved shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the development and thereafter implemented in full. The car park shall be used only for the purposes ancillary to the use hereby approved and shall not be used for any other purposes, such as for Wembley Stadium event parking or any other parking for those who do not occupy or patronise the development.

Reason: To ensure a satisfactory development that does not result in conditions prejudicial to the free and safe flow of traffic on the local highway network.

INFORMATIVES:

- (1) Asbestos has been identified on site. The applicant should be reminded of their duties under the Control of Asbestos Regulations 2012 in relation to the requirement for assessments, plans, control measures and notifications. They have a duty of care to their staff and future site users.
- (2) Thames Water advise that: With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.
- (3) Thames Water advise that: There are public sewers crossing or close to your development. In order to protect public sewers and to ensure that Thames Water can gain access to those sewers for future repair and maintenance, approval should be sought from Thames Water where the erection of a building or an extension to a building or underpinning work would be over the line of, or would come within 3 metres of, a public sewer. Thames Water will usually refuse such approval in respect of the construction of new buildings, but approval may be granted in some cases for extensions to existing buildings. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the options available at this site.
- (4) Thames Water advise that: A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at <http://www.thameswater.co.uk/business/9993.htm> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.
- (5) Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.
- (6) The Environment Agency advise that: In order to discharge the surface water condition, the following information must be provided based on the agreed drainage strategy:
- A clearly labelled drainage layout plan showing pipe networks and any attenuation areas or storage locations. This plan should show any pipe 'node numbers' that have been referred to in network calculations and it should also show invert and cover levels of manholes.
 - Confirmation of the critical storm duration.

- c) Where infiltration forms part of the proposed stormwater system such as infiltration trenches and soakaways, soakage test results and test locations are to be submitted in accordance with BRE digest 365.
- d) Where on site attenuation is achieved through ponds, swales, geocellular storage or other similar methods, calculations showing the volume of these are also required.
- e) Where an outfall discharge control device is to be used such as a hydrobrake or twin orifice, this should be shown on the plan with the rate of discharge stated.
- f) Calculations should demonstrate how the system operates during a 1 in 100 chance in any year critical duration storm event, including an allowance for climate change in line with the National Planning Policy Framework Technical Guidance. If overland flooding occurs in this event, a plan should also be submitted detailing the location of overland flow paths and the extent and depth of ponding.

Any person wishing to inspect the above papers should contact David Glover, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 5344