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Dear Alan,

Thank you for your comments issued by email on 24th May in relation to our planning application (reference: 2613/APP/2024/1217) at Graze, Springfield Road. CBRE partially responded to these comments on the 3rd of June by email.

On the 6th of June you also sent across comments made by the Environmental Health Officer on the above application.

This letter full addresses the points raised in both your initial email from 24th May, inclusive of our partial response and the points raised by the Environmental Health Officer, to provide a full comprehensive response.

Visual Impact

The proposed development is located on the western elevation of the existing Graze factory. We note that you have suggested that the proposed development is located to the southern elevation of the factory.

The existing factory sits on the corner of Springfield Road and Bullsbrook Road. The location of the proposed water treatment effluent plant is the most appropriate location to link the proposed development to the existing services at the site. The proposed location minimises the overall amount of change as it is replacing shipping containers of industrial equipment with another shipping container for industrial equipment and is therefore not introducing new development / infrastructure to this location.

The potential relocation of the building to the south side of the building as you have suggested would also be significantly less screened and still located fronting a public highway. This would also not be appropriate as this already fully occupied for lorries and deliveries.

The existing boundary treatments along the Springfield Road boundary forms a number of mature trees that work well to screen the development from views from the public highway, the trees are planted in a narrow strip of soil between the wall and the car park. It might be possible to plant additional trees in this location however their chance of survival is limited due to the lack of space and root spread of the existing trees.

Although as you note is utilitarian in its design, we consider the development to be appropriate for its location set within the existing established industrial estate. It is also entirely functional, to ensure that the plant required to appropriately treat effluent is appropriately screened for safety reasons.

We propose that given its location within an industrial estate, which mainly comprises brick, steel and concrete as the primary materials, that this development is acceptable in its current form.

The tank shall comprise black plastic, the plans have been updated to reflect this.

Planting

As noted above, the existing boundary treatment along Springfield Road forms mature trees. There is no available space within the site for additional planting as this area is occupied by parking spaces.

I have included some images from google street view to details how the development will be screened by the existing boundary treatments.

For reference the proposed development will replace the existing grey shipping container shown in the below photographs. (Red arrow indicates the location of the shipping container)



Fencing

With regard to the fencing, we included the fencing within the application description on the application forms and within the Planning Statement, and its extent is shown on the location plan.

The proposed location of the fencing is shown as a purple line on the plan below, and broadly follows the Springfield Road boundary round to Bullsbrook Road to meet the existing fencing which secures the service yard.

Type:

Boundary treatments (e.g. fences, walls)

Existing materials and finishes:

Boundary wall in red brick

Proposed materials and finishes:

Boundary wall in red brick topped with black palisade fencing

I note that you consider that the type and height of the fence would not be acceptable in this location. In selecting the type of fence for the site, consideration has been had to the existing boundary treatments along Springfield Road which are also at least 1.8m in height and of similar appearance to the proposed fencing. I have included some examples from Google Streetview below which are all within the immediate vicinity of the Graze Natural Factory.

Given that the site is within an industrial area, the proposed fencing is considered to be in-keeping with the character of the area and therefore appropriate to establish the security of the site.





Odour Abatement

Detail was requested by the EHO on how any odour arising from the water treatment will be dealt with. Within the proposed development, tall tanks and pipework will be fully enclosed to prevent odour from escaping from the treatment plant. Following the water being treated, there will be one solids waste bin which will have a fitted lid and be emptied regularly.

It is however noted that there are no sensitive receptors within the immediate surrounding area, with the closest dwelling being located 200m to the north. As such it is not considered that any nearby neighbours will be impacted by the proposed development in relation to noise, odour, visual impact or nuisance and no further information is required.

Environmental Health Officers Comments

In response to the comments made by the EHO, we consider each point in turn below.

What is meant by 'trade effluent' and what it is that is being treated?

The proposed water effluent treatment plant is to be designed and manufactured by ETP Services Limited. Trade effluent is any effluent that is produced from a process or activity undertaken at premises that are used to carry out a trade or industry.

The Drainage Statement (Baynham Meikle) submitted with the planning application states that the effluent treatment plant will be specifically designed to effectively manage effluent from the bakery and ensure that water is treated before being discharged into the Thames Water sewer system. This will ensure that the effluent discharge consent limits can be met, as set by Thames Water.

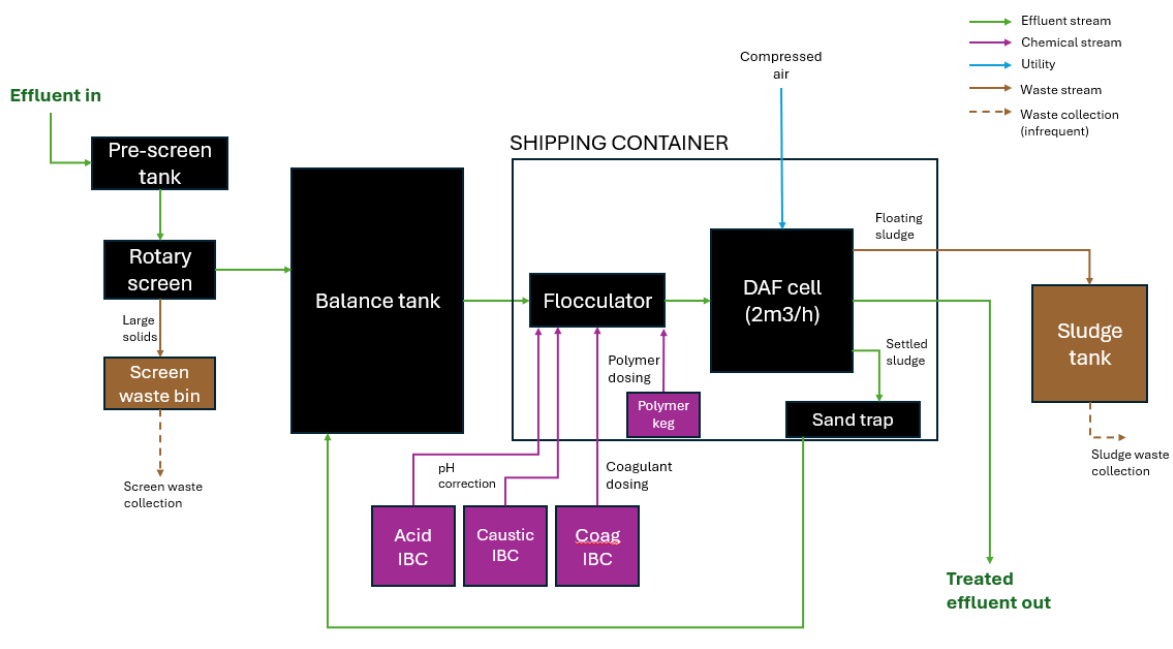
There is a lack of information in the application about the actual processes involved and therefore it is not immediately obvious as to what the likely issues are.

It's also necessary to understand what residual management requirements there are. If it's a treatment plant, there is likely to be a residue/discharge/waste produce that requires some form of disposal. We require details about this.

Graze is a food factory producing flapjacks and savoury snack mixes. The trade effluent is water runoff from cleaning activities from food manufacturing processes. This wastewater is fed into a separate waste sewer. The treatment plant will correct contaminant levels to below discharge consent limits set by Thames Water.

The plant will have two waste streams; small solids waste (which is screened out into a bin & emptied regularly) and a sludge tank which will be emptied by a tanker on a monthly basis. Disposal routes depend on pending sample results but are likely to be anaerobic digestion or animal feed.

The diagram below details the process involved in treating the effluent prior to its discharge into Thames Water sewers.



We must also understand whether there would be secondary permitting from the Environment Agency.

A permit for the discharge of effluent or waste water is only required where discharges: (Source <https://www.gov.uk/find-licences/discharge-of-trade-effluent-england-and-wales>)

- into surface waters, for example, rivers, streams, estuaries, lakes, canals or coastal waters,
- into or on the ground, such as spreading waste sheep dip, or discharging treated sewage effluent to ground through an infiltration system.

It should also be noted that the chemical storage for this development is under the threshold for requiring a permit from the EA.

This particular water treatment plant will discharge into a Thames Water Sewer and as such requires permission from Thames Water. As stated within the Planning Statement Thames Water have requested the proposed development to ensure that the Graze Factory is complying with their discharge conditions. If they have not been consulted already, please consult Thames Water on this application.

Source: <https://www.thameswater.co.uk/wholesale/trade-effluent#:~:text=If%20you%20want%20to%20discharge,trade%20effluent%20without%20a%20consent.>

We hope that this letter addresses the concerns raised and provides sufficient insight into the process of the proposed treatment plant.

If you would like to discuss the content of this letter, please contact Jess as per the details listed at the top of this letter or contact Grace Brocklehurst on grace.brocklehurst@cbre.com. We would request that if any further concerns arise during the determination period of the application that the case officer contacts us directly prior to issuing any decision.

Kind Regards
Jess Allsopp