

**Change of use of plant/machinery workshop to a recycling and waste transfer station and associated external storage bays at The Knights Unit, Squires Farm Industrial Estate, Palehouse Common, East Sussex, TN22 5RB**

**Planning Statement**

**On behalf of Mr Victor Penfold**

**August 2019**

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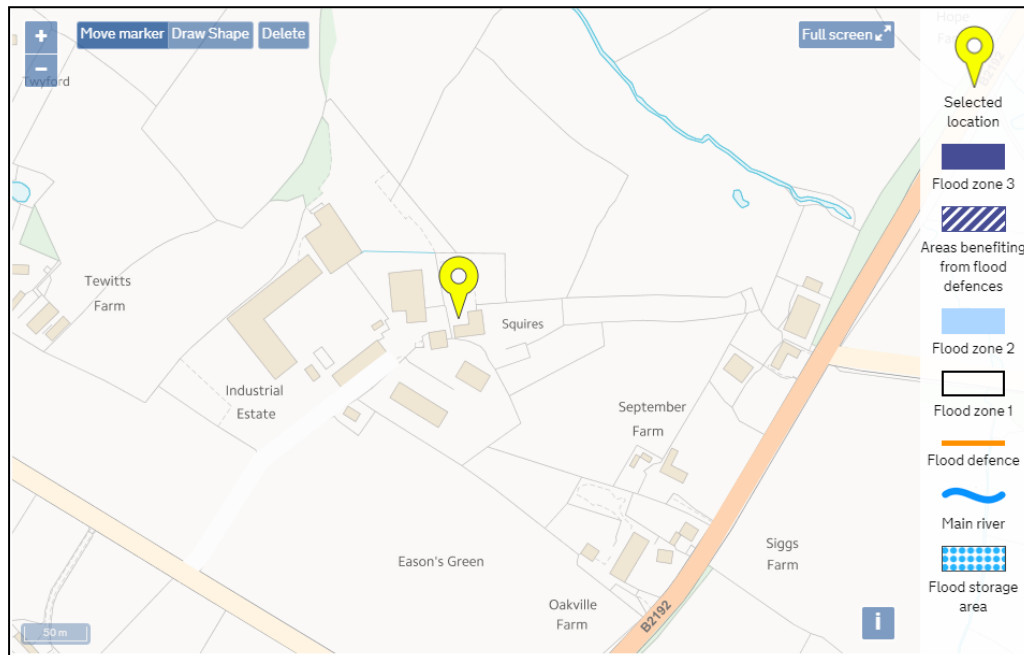
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## **1.0 Introduction**

- 1.1 This Planning Statement has been prepared on behalf of our client Victor Penfold (Skilton Skips) for the change of use of plant/machinery workshop to a recycling and waste transfer station and associated external storage bays at The Knights Unit, Squires Farm Industrial Estate, Palehouse Common, East Sussex, TN22 5RB.
- 1.2 The Statement should be considered alongside indicative drawings of the proposal prepared by the Derek Salsbury Practice.
- 1.3 This statement explains compliance with key planning policy and explains the manner in which the station intends to operate and the benefits that a planning permission on the site would provide to the existing business.

## 2.0 The Site and Surrounding Area

- 2.1 The internal floor area at ground floor level is 355.6 sqm. The internal floor area of 1<sup>st</sup> floor office is 66.9 sqm. The gross internal floor area of the Knights Unit is 422.5. The unit also has an outside ramp of 337.2 sqm for parking and outside storage.
- 2.2 Squires Farm Industrial Estate is located on the outskirts of Uckfield, two miles from the town centre and 1.2 miles from A22 junction at Halland. The estate is accessed via a private driveway from Palehouse Common which adjoins the B2192 Halland/Heathfield Road.
- 2.3 In terms of the wider area, it is characterised by scattered residential development and open countryside.
- 2.4 In terms of land designations, the site is located outside any defined 'Development Boundary', and is not within a Conservation Area. The site is wholly within flood zone 1, the lowest risk zone and shown below in Figure 1.



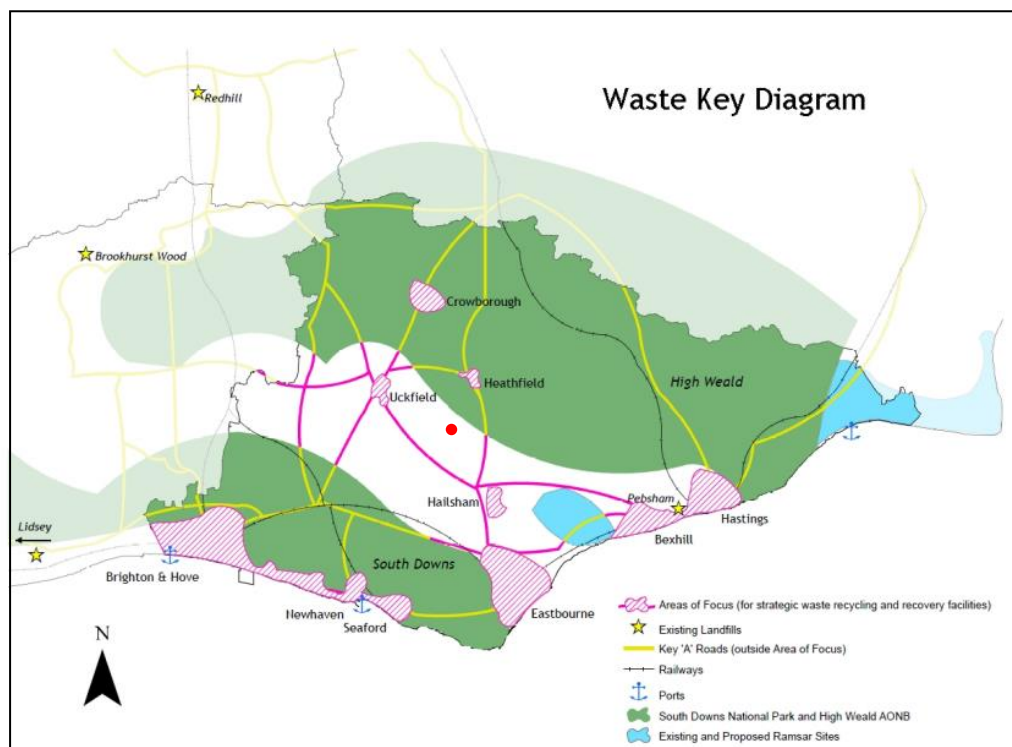
**Figure 1:** Environment Agency Flood Risk Map

2.5 The site is shown in its location below in Figure 2.



**Figure 2:** The potential application site

2.6 East Sussex County Council's Waste Key Diagram is shown below in Figure 3.



**Figure 3:** The application site (marked in red) shown in the context of the Waste Key Diagram from the Waste and Minerals Plan (adopted 19 February 2013)

### **3.0 The Proposal**

- 3.1 The existing industrial unit has been long established for the maintenance and repair of plant/machinery workshop.
- 3.2 The unit is now vacant and is proposed for use as a waste transfer station by a small skip company seeking to relocate.
- 3.3 The station itself will comprise two bays inside and two bays outside with associated parking area.
- 3.4 The development would enable them to have separate bays for different types of recycling. The facility would sort waste and load recycling materials for their onward journey for recycling and processing as well as hold products made from recycled materials for distribution to local businesses.
- 3.5 There would be approximately 8 two way HGV movements per day and broadly 6 two way car movements (84 per week).
- 3.6 Skilton Skips intend to sort in the region of 20,000 tonnes of waste and recycling per annum. They intend to apply for a waste and recycling permit.

#### **4.0 Relevant Planning Policy**

- 4.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the policies in the Development Plan, unless other material considerations indicate otherwise.
- 4.2 This section of the Statement explains how the proposal complies with relevant planning policy and identifies a strong body of material considerations that also support the grant of planning permission in this particular case.

#### **The Development Plan**

- 4.3 The relevant documents that comprise the Development Plan are:
- The Waste and Minerals Plan (adopted 19 February 2013)
- 4.4 In addition to these documents, there is also a need to consider relevant Planning Policy contained within the National Planning Policy Framework (2019) (NPPF) and National Planning Policy for Waste (October 2014).

#### National Planning Policy Framework (NPPF)(2019)

- 4.5 On 19<sup>th</sup> February 2019, the National Planning Policy Framework (NPPF) was published, with the policies relating to development management applying with immediate effect.
- 4.6 Paragraph 10 confirms that the heart Framework is a presumption in favour of sustainable development. For decision-taking, the NPPF states that this means:

*"• Approving development proposals that accord with an up-to-date development plan without delay; or*

*• where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>7</sup>, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed<sup>6</sup>; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

4.7 The NPPF contains policies specifically relevant to building a strong, competitive economy in section 6 paragraphs 80 – 82. The tone for the application of these policies is set by the Government's express purpose for the policies and decisions which is to *"help create the conditions in which businesses can invest, expand and adapt."*

4.8 Paragraph 80 goes on to confirm *"significant weight should be placed on the need to support economic growth and productivity"*

4.9 Paragraph 81 asserts that planning policies should, among other things, set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.

4.10 This is a particularly important material consideration. The application proposal would assist the County Council in delivering economic growth through assisting an existing, thriving business to invest and expand. The proposal is emphatically supported by section 6 of the NPPF.

4.11 Section 11 has regard to making effective use of land. Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses. Strategic policies should seek to make as much use as possible of previously-developed or 'brownfield' land such as application site.



National Planning Policy for Waste (October 2014)

- 4.12 The Waste Management Plan for England sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. Positive planning plays a pivotal role in delivering this country's waste ambitions through, amongst other things, delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy.
- 4.13 Paragraph 4 looks at identifying suitable sites and areas giving priority to the '*re-use of previously-developed land, sites identified for employment uses*'. It also states that planning authorities should consider a '*broad range of locations including industrial sites*' for waste management facilities.
- 4.14 Paragraphs 7 address determining planning applications related to waste. When determining waste planning applications, waste planning authorities should, *inter alia*:
- only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan;
  - consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B and the locational implications of any advice on health from the relevant health bodies;
  - ensure that waste management facilities in themselves are well-designed, so that they contribute positively to the character and quality of the area in which they are located;
  - concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities;
- And

- ensure that land raising or landfill sites are restored to beneficial after uses at the earliest opportunity and to high environmental standards through the application of appropriate conditions where necessary.

The Waste and Minerals Plan (adopted 19 February 2013)

- 4.15 Policy WMP 1 of The Waste and Minerals Plan reiterates the presumption in favour of sustainable development that runs as a golden thread through the NPPF. The Plan advises that:

*'The Authorities will take a positive approach to waste and minerals development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.'*

- 4.16 Policy WMP 7a relates to sustainable locations for waste development. The proposal is outside The Area of Focus. The Areas of Focus identified in this policy as well as the key routes are shown on the Waste Key Diagram (Figure 3).

- 4.17 Policy WMP 7b expands on Policy WMP 7a stating that before other locations are considered preference will be given to proposals for development on land meeting one or more of the following criteria:

- *'General industrial land including general industrial estates;*
- *Employment land (B2/B8 uses);*
- *Previously-developed land;*
- *Land already in waste management uses.'*

## 5.0 Planning Assessment

5.1 With all planning applications there are a number of issues that need to be addressed before planning permission can be granted. This section of the statement explains the issues that have been identified through the preparation of this planning application and how they are overcome.

5.2 The material planning considerations associated with the development proposal comprise the following:

- Principle of Development
- Transport
- Visual Impact
- Ashdown Forest SPA / SAC
- Impact on Adjoining properties
- Noise Impact
- Dust Generation

### Principle of Development

5.3 Policy WMP 7a of the Waste and Minerals Plan relates to sustainable locations for waste development. The proposal is outside of The Area of Focus. However, as small-scale facilities are proposed predominantly to meet smaller, more localised needs only. Footnote 54 notes that smaller, localised facilities can be essential in helping to provide local solutions for collecting, sorting, bulking, and transferring and treating wastes in complementing the waste treatment provided at more strategic larger-scale facilities. The proposal is small scale and would meet local needs.

5.4 Paragraph 4 of the National Planning Policy for Waste looks at identifying suitable sites and areas giving priority to the '*re-use of previously-developed land, sites identified for employment uses*'. It also states that planning authorities should consider a '*broad range of locations including industrial sites*' for waste

management facilities. The proposal intends to use a previously developed site contained within an industrial estate.

- 5.5 The proposal would drive waste up the waste hierarchy without conflicting with the local waste strategy. It would bring about the restoration of brownfield land for a positive use and can be designed sensitively to respect the landscape that surrounds the site.
- 5.6 Paragraph 80 and 81 of NPPF looks to encourage sustainable economic growth. This is a particularly important material consideration. The application proposal would assist the County Council in delivering economic growth through assisting an existing, thriving business to invest and expand. The proposal is emphatically supported by section 6 of the NPPF.

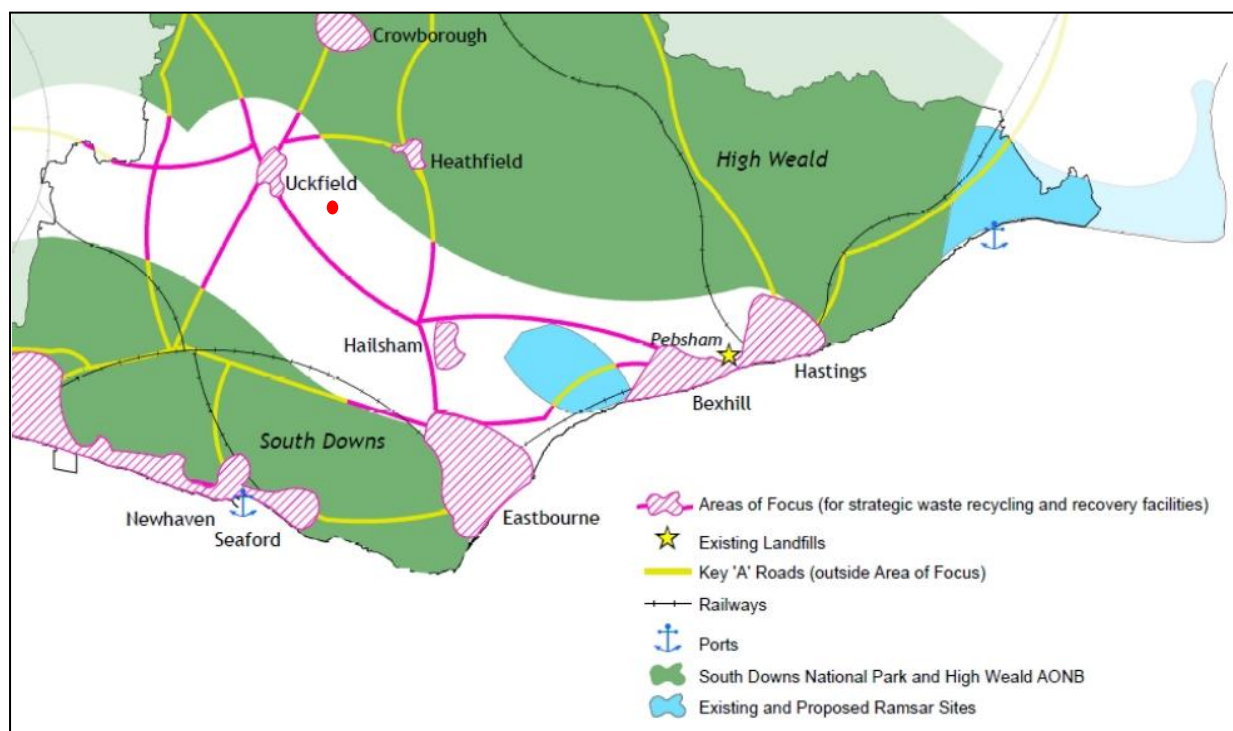
#### Visual Impact

- 5.7 The vacant unit proposed for the waste transfer station has been long established for the maintenance and repair of heavy plant and vehicles.
- 5.8 Policy WMP 7b of the Waste and Minerals Plan states that waste and minerals development is preferred to be on general industrial land including general industrial estates and previously-developed land. The proposed unit is situated within Squires Farm Industrial Estate on previously developed land.
- 5.9 Due to this, visually there will be very little impact on the surrounding area if any at all.

#### Transport

- 5.10 Policy WMP 7a of the Waste and Minerals Plan also states that proposals outside of The Area of Focus are to be well related to the relevant main treatment facilities within the Plan Area.

- 5.11 The proposed waste transfer station is to be located on the outskirts of Uckfield, two miles from the town centre and 1.2 miles from A22 junction at Halland. The estate is accessed via a private driveway from Palehouse Common which adjoins the B2192 Halland/Heathfield Road.
- 5.12 The proposal is well related to the relevant main treatment facilities within the Plan Area as shown in Figure 4 below.



**Figure 4:** Site location (marked in red) in relation to the relevant main treatment facilities within the Plan Area

- 5.13 The proposal is approximately located 3.1 miles from the Uckfield Area of Focus, 6.4 miles from the Heathfield Area of Focus, 9.4 miles Hailsham Area of Focus and 12.7 miles from Crowborough Area of Focus.
- 5.14 Squires Farm Industrial Estate is located just outside the Uckfield Area of Focus but is well located benefitting from excellent access to the strategic road

network. The sites location does not preclude the application from attaining planning permission which is stated in Policy WMP 7:

*"However this policy recognises that there may be sites which are acceptable in principle but are beyond the Areas of Focus. For example, there may be sites just outside of the Areas of Focus where there may be overriding sustainability reasons for permitting development, such as supporting movement up the waste hierarchy or their being well-related to the strategic road network."*

- 5.15 Schemes will be permitted where they do not create or perpetuate unacceptable traffic conditions and a satisfactory means of access is provided to meet local planning and highway authority standards. The local road network can accommodate the additional movements and a safe access has been provided. It is worth noting that the NPPF raises the bar in terms of highways impact to "severe" before refusal is warranted. Given the existing use 84 vehicle movements per week will not severely impact the road network.

#### Noise Impact on adjoining properties

- 5.16 Due to the nature of recycling and waste management it is inevitable that an increase in noise will be experienced. It is anticipated that there will be noise level implications for nearby properties, but should be within typical industrial estate levels.
- 5.17 The source will be a 360 excavator will be used to grab material of the ground once sorted by hand. Machinery like this is commonplace on industrial estates.
- 5.18 Normal site hours will be limited to 08:00-18:00 Monday to Saturday. This will in turn limit the amount of noise generated.
- 5.19 Policy WMP 7b identifies industrial estates as an appropriate location for waste and recycling stations: *"General industrial land including general industrial estates."* Noise generation will not be out of place on an industrial estate where it is commonplace for there to be a certain amount of noise generated and will

make a modest contribution to the overall noise created by Squires Farm Industrial Estate.

#### Dust Generation

- 5.20 Dust, and particulate matter arising from waste processing operations, can cause concern. The amount of dust generated is a factor of the nature of the material, the method of handling and the volume of material being handled.
- 5.21 The likely dust generation activities include unloading, movement and transfer of recycling/waste, processing of the recycling/waste, dust from wheels of vehicles and stockpiling.
- 5.22 The main principles for preventing dust emissions at the Knights Unit are by avoidance of dust then containment of dusty processes and suppression of dust (i.e. by spraying).
- 5.23 In terms of avoidance shelter from wind will be provided where possible, the wetting of materials prior to processing (if feasible) and where appropriate loads of dust products sheeted before leaving site.
- 5.24 In order to suppress the dust the provision and use of mobile water mister and spray systems will be positioned in strategic positions within the processing area and storage area containing stockpiles.

## **6.0 Design & Access**

### Use and Amount of Development

- 6.1 The proposal is for the development of a recycling and waste transfer station, the facility would sort waste and load recycling materials for their onward journey for recycling and processing as well as hold products made from recycled materials for distribution to local businesses.

### Layout

- 6.2 The site will accommodate a loading area within the unit, an office on the 1<sup>st</sup> floor, and an outside ramp for parking and outside storage.

### Access

- 6.3 The proposed site for the recycling and waste transfer station benefits from good links to the B1292.

### Scale

- 6.4 The internal floor area at ground floor level is 355.6 sqm. The internal floor area of 1<sup>st</sup> floor office is 66.9 sqm. The gross internal floor area of the Knights Unit is 422.5. The unit also has an outside ramp of 337.2 sqm for parking and outside storage.

### Landscaping

- 6.5 The existing unit has long been established and there will be no alterations to the appearance of the unit so the landscape impact will remain the same.

### Appearance



- 6.6 The industrial unit is steel framed with part brick and block plinth walling. The wall is finished with corrugated colour coated wall cladding above the plinth, extending to eaves level. The roof is clad with corrugated colour coated roof cladding with integral roof lights. The building is largely open to the roof with end mezzanine area to be used for storage purposes. The unit has large sliding doors for vehicle access with escape doors and UVPC window.

## **7.0 Conclusion**

- 7.1 This Statement has identified a raft of supportive planning policy and guidance confirming that the proposal should be acceptable when assessed against the relevant national and local planning policy and legislation. The Statement also provides an assessment and justification of the proposed scheme in relation to the associated material planning considerations.
- 7.2 The site is a sustainable location for a small scale waste development having regard to Policy WMP 7a and has the benefits of re-using brownfield land whilst being well connected to the strategic road network.
- 7.3 The proposal would help an existing, well-established business to continue to expand and provide a valuable service to the community and the environment whilst delivering economic growth.
- 7.4 We therefore respectfully request the Council supports this planning application in line with paragraph 11 of the Framework subject to appropriate conditions.