

TO: PLANNING & REGULATORY COMMITTEE **DATE:** 6 FEBRUARY 2013
BY: PLANNING DEVELOPMENT CONTROL TEAM
MANAGER
DISTRICT(S): GUILDFORD BOROUGH COUNCIL **ELECTORAL DIVISION(S):**
Worplesdon
Mr Witham

PURPOSE: FOR DECISION

GRID REF: 493990 151946

TITLE: MINERALS AND WASTE APPLICATION GU12/P/01887

SUMMARY REPORT

2020 Recycling Ltd, Chapel Farm, Guildford Road, Normandy, Surrey GU3 2AU

The use of some 0.34ha of land for the receipt, processing and distribution of up to 30,000 tonnes per annum of non-hazardous skip wastes including the change of use of some 0.036ha of previously developed land; the repair and maintenance of 2020 Recycling and Associates' vehicles; the storage of full and empty skips awaiting hire; the erection of seven precast concrete external storage bays; alterations to the existing workshop building including the raising of roof height and replacement of three smaller workshop roller shutter doors with taller versions; the erection of a 2.5m high galvanised steel palisade fence on the western and northern boundaries; the repositioning of a 2.5m high acoustic barrier on the southern boundary.

The application site measures some 0.34ha in total and is situated in a rural location within the Metropolitan Green Belt. The closest residential dwelling to the application site is Chapel Farm Cottage. This dwelling's residential curtilage borders the site to the south. Chapel Farm Cottage is a Grade II Listed 16th Century building. Some 28m from the southeast corner of the application site is No.1 Chapel Farm Residential Mobile Home Park.

In October 2010 Surrey County Council granted planning permission (Ref. GU10/1501) for the continued use of the existing materials recovery facility without compliance with conditions 3 and 4 of planning permission Ref. GU09/2057 to allow the processing of waste using fixed and mobile plant and machinery at the site and variation of condition 5 of planning permission Ref. GU09/2057 to allow the storage of waste within the building and covered bays. Planning permission Refs. GU09/2057 and GU10/1501 allow for the importation and processing of 30,000 tonnes of non-hazardous skip wastes per annum.

Although a large part of the application site has planning permission for a waste management use (Refs. GU09/2057 and GU10/1501) the expansion of the site area into the southeast corner, the current site layout and some of the activities being undertaken are not covered by these permissions. Some of these changes have already taken place and therefore the application seeks retrospective planning permission to regularise the unauthorised aspects of the development in addition to seeking express permission to undertake further operational development.

Officers consider that the application site's contribution to recycling and recovery of some 30,000 tonnes of construction, demolition, industrial and commercial waste in Surrey would be valuable. Further, an increase in the number of waste management facilities within Surrey is likely to increase the landfill diversion rate and the rate of waste reuse, recycling and/or recovery

in accordance with the Waste Strategy for England 2011. Officers consider that the proposal would continue to make a positive contribution to achieving the regional targets set by the South East Plan 2009 and to sustainable waste management overall.

Overall the application site would attract some 76 HGV movements per day which, according to the applicant, would include HGVs returning to their base at the end of the working day. In respect of non-HGV vehicular traffic, the applicant expects 10 employees to create 20 vehicle movements per day. Accordingly, the application site would generate some 96-vehicle movements per day in total including HGV movements.

Surrey County Council's Historic Buildings Officer (HBO) has assessed the setting of Chapel Farm Cottage in relation to the proposal. The HBO considers that the visual impact of the proposed development would not have a material impact on the already compromised historic setting of Chapel Farm Cottage.

Given the capacity of the mobile plant to extend processing operations above the height of the southern and eastern boundaries and therefore adversely affect local amenity by way of noise Officers consider it proportionate and reasonable, should planning permission be granted, to limit all processing operations undertaken within the southeastern corner of the application site to a height not exceeding that of the acoustic barrier i.e. 2.5 meters. It follows that a further condition prohibiting mobile plant from working above ground level, i.e. on top of stockpiles, should be imposed on any planning permission granted.

Surrey County Council's Air Quality Consultant (AQC) has assessed the development proposed in conjunction with the applicant's Air Quality Assessment. No objection to the development is raised by the AQC subject to the applicant's suggested Dust Action Plan (DAP) being subject to a planning condition. The AQC considers the applicant's DAP to be comprehensive. Guildford Borough Council have confirmed that there is no complaint history relating to the waste management facility in respect of dust or odour.

The application site, bar some 0.036ha of land, is already in waste management use therefore the proposal does not involve the introduction of a new waste management facility or any new buildings/structures into the landscape. The principal extension proposed i.e. raising of part of the existing building's roof height has already been accepted in principle by Surrey County Council (Ref. GU09/2057).

The proposal in its entirety is inappropriate development in the Green Belt. It is industrial in nature and causes harm to the openness of the Green Belt and undermines the reasons for including land within the Green Belt. The onus is upon the applicant to demonstrate factors which amount to 'very special circumstances' which clearly outweighs the harm caused to the Green Belt by reason of inappropriateness and any other harm. Officers consider that the harm to the openness of the Green Belt in this case to be relevant to the harm caused by the existing lawful waste management use and its associated existing structures/buildings.

Guildford Borough Council, the Environment Agency and Surrey County Council Transportation Development Control have not objected to the development subject to conditions.

Having regard to the conclusions of the alternative site assessment produced by the applicant, the obvious economic and wider benefits of sustainable waste management, and the continued need for the development, Officers consider that there are factors which amount to 'very special circumstances' outweighing the harm to the Green Belt and any other harm.

The recommendation is to GRANT planning permission subject to conditions.

APPLICATION DETAILS

Applicant

2020 Recycling Ltd

Date application valid

25 October 2012

Period for Determination

24 January 2013

Amending Documents

Email dated 14 December 2012 from Mr Dominic O’Loughlen enclosing updated Air Quality Assessment dated December 2012

Email dated 17 December 2012 from Mr Dominic O’Loughlen

Email dated 18 January 2013 from Mr Dominic O’Loughlen

Email dated 24 January 2013 from Mr Dominic O’Loughlen

SUMMARY OF PLANNING ISSUES

This section identifies and summarises the main planning issues in the report. The full text should be considered before the meeting.

	Is this aspect of the proposal in accordance with the development plan?	Paragraphs in the report where this has been discussed
Waste Management Issues	Yes	45 - 84
Highways, Traffic and Access	Yes	86 - 103
Heritage Assets	Yes	104 - 118
Noise	Yes	119 - 138
Air Quality	Yes	139 - 155
Landscape and Visual Impact	Yes	156 - 164
Metropolitan Green Belt	No	165 - 181

ILLUSTRATIVE MATERIAL

Site Plans

Drawing: B/PL/001 – Application Site Location – dated August 2012

Drawing: B/PL/002 – Proposed Redline Boundary Plan – dated August 2012

Drawing: B/PL/003 – Current Elevations & Proposed Elevations – dated April 2012

Drawing: B/PL/004 – Proposed Block Plan – dated August 2012

Drawing: B/PL/005 – Site Photographs – dated September 2012

Drawing: PL/007 – HGV Tracking – dated August 2012

Drawing: B/PL/010 – Acoustic Barrier on Site Boundary – dated September 2012

Drawing: B/PL/033 – Previously Consented Elevations & Proposed Elevations – dated August 2012

Aerial Photographs

Aerial 1 – 2020 Recycling, Chapel Farm

Aerial 2 – 202 Recycling, Chapel Farm

Site Photographs/Plans

Plan 1 – Application Site Area

Plan 2 – Proposed Block Plan

Figure 1 – Application Site looking North

Figure 2 – Application Site looking South towards Emergency Access Gate

Figure 3 – Application Site looking Southeast

Figure 4 – Concrete Wall on Eastern Boundary adjacent to Aldershot Care Spares

Figure 5 – Acoustic Fencing on Southern Boundary

Figure 6 – Existing Site Office and Weighbridge

Figure 7 – Internal View of Existing Building

Figure 8 – Mobile Plant

Figure 9 – Roofline of Existing Building

Figure 10 – Skip Storage Area on Western Boundary

Figure 11 – Skip Storage Area

Figure 12 – Sorting Operations in Existing Building

BACKGROUND

Site Description

- 1 The application site subject to this report measures some 0.34ha in total. It is situated in a rural location within the Metropolitan Green Belt. The application site is located along the A323 Guildford Road some 1.45km east of the centre of Normandy, 3.25km west of Guildford, 4km east of Ash, 9.7km northeast of Woking, and some 6.4km southwest of Aldershot, Hampshire.
- 2 The application site is accessed off the A323 Guildford Road via a private access road which also serves Aldershot Care Spares (formerly known as Normandy Auto Salvage and Spares). The application site forms part of a large square area of developed land measuring some 7ha. This large area of land comprises a number of differing planning units and land uses including residential, commercial, and industrial.
- 3 The land surrounding this large square area of developed land comprises open fields and woodland which is predominantly in agricultural use. Further developed land within close proximity to the application site is principally situated along the A323 Guildford/Aldershot Road and Bailes Lane.
- 4 Immediately north and west of the application site are agricultural fields. To the east of the application site is Aldershot Car Spares with Chapel Farm Residential Mobile Home Park beyond, and to the south the residential dwelling known as Chapel Farm Cottage and Chapel Farm Eggs with the remainder of Chapel Farm Residential Mobile Home Park beyond.
- 5 The application site's perimeter boundaries comprise 2.5 meter high palisade fence (northern and western boundaries), a 3.2 meter high concrete wall (eastern boundary) and a 2.5 metre high acoustic barrier (southern boundary). The northern and western boundaries are screened by dense established conifers.
- 6 The closest residential dwelling to the application site is Chapel Farm Cottage. The dwelling's residential curtilage borders the site to the south. Some 28m from the southeast corner of the application site is No.1 Chapel Farm Residential Mobile Home Park. Chapel Farm Cottage is a Grade II Listed 16th Century building. Some 115m south of the application site, beyond Chapel Farm Cottage, is The Homestead which is also 16th Century Grade 2 listed building.

- 7 1.35km Northwest of the application site lie the Thames Basin Heaths Special Protection Area (SPA), Ash to Brookwood Heaths Site of Special Scientific Interest (SSSI), and the Thursley, Ash, Pirbright, Chobham Special Area of Conservation (SAC).
- 8 The Henley Park Fields Site of Nature Conservation Interest (SNCI) lies some 360m northwest and 388m west of the application site respectively, together with the Withered Copse SNCI (some 525m northwest), Normandy Pond SNCI (some 964m west), and the Backside Common SNCI (some 854m south).

Planning History

- 9 In November 1986 Guildford Borough Council granted planning permission (Ref. 86/P/00030) for the erection of a new workshop for hire vehicle maintenance with restroom and office for Sanitrix Ltd. following demolition of an existing workshop and offices.
- 10 In January 1996 Guildford Borough Council granted planning permission (Ref. 95/P/01519) for a single storey extension to the existing workshop for service and repair of heavy goods vehicles. In October 1996 Guildford Borough Council granted a further planning permission (Ref. 96/P/01021) for the change of use of the existing bungalow to an office use.
- 11 In March 2010 Surrey County Council granted planning permission (Ref. GU09/2057) for the use of the land as a materials recovery facility for the receipt and processing of up to 30,000 tonnes per annum of non-hazardous skips wastes with alterations to existing workshop building including raising the roof height of the lower part of the building to match the higher part, replacement of two smaller workshop roller shutter doors with taller versions to match the existing taller doors, removal of the two centre roller shutters replaced with walling to match existing elevation, erection of an acoustic screen attached to the western elevation of the workshop, installation of waste processing plant within the workshop, two bays formed from pre-cast concrete section walls, the provision of a weighbridge, the resurfacing of external areas and the installation of a sealed drainage system and the maintenance of Full Circle and associates' vehicles within a single bay workshop, the storage of those vehicles and the storage of empty skips awaiting hire and erection of two 2.5m high acoustic barriers/fences.
- 12 In October 2010 Surrey County Council granted planning permission (Ref. GU10/1501) for the continued use of the existing materials recovery facility without compliance with conditions 3 and 4 of planning permission Ref. GU09/2057 to allow the processing of waste using fixed and mobile plant and machinery at the site and variation of condition 5 of planning permission Ref. GU09/2057 to allow the storage of waste within the building and covered bays.
- 13 In February 2012 Surrey County Council approved the details of a Method of Construction Statement and Dust Action Plan submitted pursuant to conditions 7 and 13 of planning permission Ref. GU10/1501.

THE PROPOSAL

- 14 Although a large part of the application site has planning permission for a waste management use (Ref. GU10/1501) the expansion of the site area, the current site layout and some of the activities being undertaken are not covered by planning permission Ref. GU10/1501. The application seeks retrospective planning permission to regularise this development in addition to seeking express permission to undertake further operational development. The development proposal can be summarised as follows:

Use

- 15 The applicant's intention is to use the application site for the importation, deposit, storage and processing of some 30,000 tonnes of non-hazardous skips waste per annum; the repair

and maintenance of vehicles relating to 2020 Recycling and their associates; and the storage of full and empty skips. Initially skip waste is to be deposited within the existing building where it would be sorted into waste streams. Inert waste (soil, brick, tiles, concrete etc.) would then be processed and stored in the open whilst active wastes (plastic, metal, paper etc.) are to be processed (baled, stockpiled etc.) within the existing waste building. The proposal does not include an increase in the nature or the volume of waste to be processed on the application site. Planning permission Ref. GU10/1501 allows for 30,000 tonnes of non-hazardous skip waste to be processed at the facility annually.

Application Site Area

16 The boundary of the application site now extends beyond that of that permitted by planning permission Ref. GU10/1501. The incorporation of an additional area of land into the southeast corner of the site means that the total site area is to be expanded from some 3,052m² to some 3,415m². This represents an increase of some 363m² or 12%. This additional area of land is not subject to planning permission Ref. GU10/1501 and as such the proposal, amongst other matters, seeks planning permission to materially change the use of some 363m² of land to a sui generis waste management use akin to that permitted by planning permission Ref. GU10/1501.

Waste Management Building Roof Height

17 The height of the existing waste management building roofline is staggered. The northern half of the building extends to some 9m in height, whilst the southern half of the building extends to some 7m in height. The applicant proposes to increase the height of the southern half of the existing building to 9m so as to match the higher (northern) half. The surface area of the existing building would not be enlarged or altered. In addition to the roof height of the building, the applicant proposes to replace the existing two centre roller shutters with brick walling to match the existing façade of the building, and replace the existing two smaller roller shutters with larger shutters which match the larger existing shutters.

HGV Parking and Skip Storage Area

18 The applicant proposes to increase provision for HGV parking and skip storage on the application site to some 340m². This parking and storage area is proposed to be located within the northeastern corner of the application site as per planning permission GU10/1501. In order to facilitate this extended parking/storage area the applicant has demolished a timber framed shed building. Further informal overspill parking would continue to take place to the south of the application site's access.

Perimeter Security Fencing

19 The applicant proposes to replace the 2.1m high wooden post and wire mesh fence along the western and northern boundaries of the application site with a 2.5m high metal palisade fence screened with green mesh. The applicant does not propose any further screen planting.

Acoustic Barrier and Emergency Access Gate

20 The applicant proposes to relocate the existing acoustic barrier and establish an emergency access gate along the southern boundary of the application site. The acoustic barrier had previously been located along a short stretch of the southeastern boundary of the site, however the expansion of the site area by some 340m², and the intention to process materials in the open within the southeastern corner of the application site, has necessitated the relocation of this barrier. The acoustic barrier is to be repositioned along the southern boundary of the application site and extend along the northern and eastern boundaries of the northernmost part of Chapel Farm's residential curtilage. The 2.5m high acoustic barrier would extend along the southern boundary of the application site for some 45m in total.

21 Moreover the applicant also intends providing a 2.5m high emergency access gate on the southern boundary of the application site. This access gate would be constructed using the same acoustic cladding associated with the acoustic barrier, and used for emergency temporary access only.

Open Storage and Processing of Inert Waste

22 The applicant intends processing (screening and crushing) inert waste materials in the open using mechanical plant. In addition to open processing of waste, the applicant also intends establishing 7 external storage bays in total. 5 bays are to be located immediately south of the existing waste building, whilst 2 bays are to be located on the northern boundary of the application site between the proposed HGV parking/skip storage area and the existing building. Planning permission Ref. GU10/1501 allows for deposit, sorting, storage and processing of skips waste within the existing building only.

Car Parking

23 Planning permission Ref. GU10/1501 allowed for limited parking to take place along the western boundary of the application site. The proposal seeks permission for increased on-site vehicle parking to take place around the existing Penrhyn Bungalow as follows:

Type of Vehicle	Total Existing	Total Proposed	Difference in Spaces
Cars	6	9	3
Motorcycles	5	5	0
Disability Spaces	1	1	0
Cycle Spaces	5	5	0

Vehicle Movements

24 Vehicle movements to the waste management facility permitted by planning permission Ref. GU10/1505 are unrestricted, however the permission limits the annual throughput of waste to no more than 30,000 tonnes per annum.

25 The application includes an annual throughput of 30,000 tonnes of waste at a rate of 105 tonnes per working day. The applicant states that this waste management proposal would attract some 100 vehicle movements (one vehicle in and the same vehicle out equates to two movements) per day (some 20 staff vehicle movements, and some 80 HGV movements).

Other

26 The development proposed seeks to retain:

- The existing bungalow for use as a site office.
- The existing waste management building subject to the changes detailed above.
- The existing weighbridge in its current position.
- The existing concrete surface and surface water drainage arrangements.
- The existing external artificial lighting infrastructure/arrangements.
- The existing site access off the A323 Guildford/Aldershot Road via the existing private access track.

CONSULTATIONS AND PUBLICITY

Consultees (Statutory and Non-Statutory)

- | | |
|---|---------------------------------------|
| 27 Guildford Borough Council (Development Control) | - No objection subject to conditions |
| 28 Guildford Borough Council (Environmental Health) | - No objection subject to conditions |
| 29 Surrey County Council Transportation Development Control | - No objection subject to condition |
| 30 Surrey County Council Environmental Noise Consultant | - No objection subject to condition |
| 31 Surrey County Council Air Quality Consultant | - No objection subject to condition |
| 32 Surrey County Council Environmental Assessment | - Does not constitute EIA development |
| 33 Surrey County Council Historic Buildings Officer | - No objection |
| 34 The Environment Agency | - No objection |

Parish/Town Council and Amenity Groups

- | | |
|----------------------------|---------------------------|
| 35 Normandy Parish Council | - Strong objection raised |
|----------------------------|---------------------------|

Summary of publicity undertaken and key issues raised by public

36 The application was publicised by the posting of a site notice and an advert was placed in the local newspaper. A total of 43 owner/occupiers of neighbouring properties were directly notified by letter. The County Planning Authority has received three letters of representation. A summary of the issues raised by members of the public and interested parties are:

- | | |
|---|---|
| <ul style="list-style-type: none">• Inappropriate development in the Green Belt which fails to preserve openness and conflicts with the purposes of including land within the Green Belt• Increase in volume of HGV traffic on the local highway network | <ul style="list-style-type: none">• Adverse impact on local amenity by way of air pollution (dust), noise, odour, and vehicle movements• Light pollution |
|---|---|

ENVIRONMENTAL IMPACT ASSESSMENT

37 The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (EIA Regulations) implement the European Directive 85/337/EEC on the assessment of the effects of certain public and private development projects on the environment. Schedule 1 of the EIA Regulations specifies projects for which EIA is mandatory.

38 The proposed development would involve an activity that fits into one of the categories of development listed in Schedule 2 of the EIA Regulations – paragraph 11(b) installations for the disposal of waste.

39 The development subject to this application does not exceed the relevant threshold given in Schedule 2 of the EIA Regulations for installations for the disposal of waste as it would not involve an area of greater than 0.5ha. As such the development does not constitute EIA development. Although the application site is located within 1.2km of an SPA and SAC the existing waste management facility precludes the requirement for an appropriate assessment. The County Council adopted a Screening Opinion under Regulation 7 of the EIA Regulations on 11 October 2012 to this effect.

THE DEVELOPMENT PLAN

40 The County Council as the Waste/County Planning Authority has a duty under Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 to determine this application in accordance with the Development Plan unless material considerations indicate otherwise. At present, and in relation to this application, the Development Plan comprises the South East Plan 2009, which is the adopted Regional Strategy for the South East region, the Surrey Waste Plan 2008, and the Guildford Borough Local Plan 2003 (saved policies).

41 In May 2010 the Government announced its intention, through the Localism Bill, to abolish the South East Plan (SEP), which would mean the SEP would no longer form part of the Development Plan. By letter dated 6 July 2010 the Secretary of State revoked the SEP. That decision was subsequently challenged by Cala Homes and quashed by the High Court on 10 November 2010, whereupon Government advised local authorities to continue to attach considerable weight to its intention to abolish the SEP. That advice was, in turn, challenged by Cala Homes. On 7 February 2011 the High Court rejected Cala Homes' challenge to the ministerial advice, and dismissed the argument that the intention to abolish the SEP was not capable of being a material consideration. The High Court concluded that the Government's letter dated 27 May 2010 and subsequent November 2010 statement were lawful and that the weight to be attached to the SEP is, in light of the intention to abolish Regional Spatial Strategies, a matter for planning authorities to decide. On 27 May 2011, the Court of Appeal rejected an appeal by Cala Homes. The Government has now published its Strategic Environmental Assessment (SEA) of the Revocation of the SEP on 11 October 2012. This is now out for consultation until 6 December 2012. The SEA sets out the likely significant environmental effects of revocation of the SEP.

42 The Localism Bill became the Localism Act on 15 November 2011, passing into law after it was given royal assent by the Queen in the House of Lords. The provision will start to be introduced through secondary legislation during 2012 (which would include the abolition of Regional Spatial Strategies). Notwithstanding this, Officers do not consider that the issue of weight attributable to the SEP is significant in respect of this particular application because there do not appear to be any conflicts between the SEP and relevant national planning policy, and the 1st Surrey Waste Plan 2008 in particular, and they have therefore proceeded to report simply on the basis of the development plan as it stands i.e. including the SEP.

43 The National Planning Policy Framework (the Framework) was adopted in March 2012. This document provides guidance on to local planning authorities in producing local plans and in making decision on planning application. The Framework is intended to make the planning system less complex and more accessible by summarising national guidance which replaces numerous planning policy statements and guidance notes, circulars and various letters to Chief Planning Officers. The document is based on the principle of the planning system making an important contribution to sustainable development, which is seen as achieving positive growth that strikes a balance between economic, social and environmental factors. The Development Plan remains the cornerstone of the planning system. Planning applications which comply with an up to date Development Plan should be approved. Refusal should only be on the basis of conflict with the Development Plan and other material considerations.

PLANNING CONSIDERATIONS

- 44 Officers consider that the main issues that arise with this application are whether there continues to be a need for the development proposed, whether the development remains acceptable under Green Belt policy; its impact on the amenities of local residents in respect of highways, traffic and access; heritage assets; noise; air quality; and visual and landscape impact.

WASTE MANAGEMENT ISSUES

Government Guidance

National Planning Policy Framework 1 – Delivering Sustainable Development

National Planning Policy Framework 7 – Requiring Good Design

Waste Strategy for England 2011

Planning Policy Statement 10 – Planning for Sustainable Waste Management

Development Plan Policy

South East Plan 2009

Policy W5 – Targets for Diversion from Landfill

Policy W6 – Recycling and Composting

Policy W7 – Waste Management Capacity Requirements

Policy W17 – Location of Waste Management Facilities

Surrey Waste Plan 2008

Policy CW4 – Waste Management Capacity

Policy CW5 – Location of Waste Facilities

Policy WD2 – Recycling, Storage, Transfer, Materials Recovery and Processing Facilities

Waste Management Policy Context

The Framework

- 45 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so (paragraph 1). Proposed development that accords with an up-to-date Local Plan should be approved without delay, and proposed development that conflicts should be refused unless other material considerations indicate otherwise (paragraph 12).
- 46 The Framework does not contain specific waste policies, since national waste planning policy will be published as part of the National Waste Management Plan for England. However, local authorities preparing waste plans and taking decisions on waste applications should have regard to policies in the Framework so far as relevant (paragraph 5).
- 47 The Framework states that the planning system should play an active role in guiding development to sustainable solutions and that pursuing sustainable development involves seeking positive improvements in the quality of the built and natural environment, as well as in people's quality of life, including moving from a net loss of bio-diversity to achieving net gains for nature, and improving the conditions in which people live, work, travel and take leisure (paragraph 9).
- 48 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking this means: (a) approving development proposals that accord with the Development Plan without delay; and (b) where the Development Plan is absent, silent or relevant policies are out-of-date, granting permission unless: (i) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against

the policies in the Framework taken as a whole; or (ii) specific policies in the Framework indicate development should be restricted (paragraph 14).

- 49 Within the overarching roles that the planning system plays, a set of twelve core land-use planning principles should underpin decision-taking. Five of these twelve core principles are considered to be relevant to the application subject to this report, these are that planning should: (a) not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives, (b) always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land, (c) take account of the different roles and character of different areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it, (d) contribute to conserving and enhancing the natural environment and reducing pollution, and (e) encourage the effective use of land by reusing land that has been previously developed (brown field land), provided that it is not of high environmental value (paragraph 17).
- 50 Paragraph 18 of the National Planning Policy Framework (the Framework) states that the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future. Whilst paragraph 19 states that planning should operate to encourage and not act as an impediment to sustainable growth. Therefore the Framework advocates that significant weight should be placed on the need to support economic growth through the planning system.
- 51 Policy 7 at paragraph 56 of the Framework states that the Government attaches great importance to the design of the built environment and advocates that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- 52 Paragraph 58 of the Framework states that planning decisions should aim to ensure that developments (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, (b) optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks, (c) respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation, (d) create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion, and (e) are visually attractive as a result of good architecture and appropriate landscaping. Paragraph 59 requires that design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.
- 53 Policy 7 at paragraph 61 goes on to state that planning decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment. Whilst paragraph 64 asserts that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 54 At paragraph 65 Policy 7 of the Framework states that planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal's economic, social and environmental benefits).

Waste Strategy for England 2011

- 55 The overall objective of European and Government policy on waste is to protect human health and the environment, by producing less waste and by using it as a resource wherever possible. Waste strategies at the national and local level seek to reduce the current dependence on landfilling of waste and give priority to more sustainable methods of waste management through moving waste management up the waste hierarchy of reduction, reuse, recycling and composting, using waste as a source of energy, with disposal as a last resort. The strategies also seek to ensure that waste is recovered or disposed of in an environmentally acceptable manner and without endangering human health.
- 56 The Waste Strategy for England 2011 (Waste Strategy) sets out the national strategy for waste management. The document sets out the key objectives of the European Community (EC) Waste Framework Directive (Waste Directive 2006/12/EC as revised by the Waste Directive 2008/98/EC) and the European Landfill Directive (Directive 1999/31/EC) on landfilling of waste which through its key vision, aims and objectives, seeks to maximise the amount of recovery and recycling undertaken. The Waste Strategy also sets out national targets for better waste management for differing waste streams.

Planning Policy Statement 10

- 57 Paragraph 1 of Planning Policy Statement 10 (PPS10) states that the overall objective of Government policy on waste is to protect human health and the environment by producing less waste and by using it as a resource wherever possible by more sustainable waste management, moving the management of waste up the 'waste hierarchy' of prevention, preparing for reuse, recycling, other recovery, and disposing only as a last resort, the Government aims to break the link between economic growth and the environmental impact of waste. This means a step-change in the way waste is handled and significant new investment in waste management facilities. The planning system is pivotal to the adequate and timely provision of the new facilities that will be needed.
- 58 Paragraph 5 of PPS10 states that waste planning authorities should adhere to the following principles in determining planning applications (a) controls under the planning and pollution control regimes should complement rather than duplicate each other and conflicting conditions should be avoided, (b) work effectively with pollution control authorities to ensure the best use is made of expertise and information, and that decisions on planning applications and pollution control permits are delivered expeditiously, and (c) in considering planning applications for waste management facilities before development plans can be reviewed to reflect this PPS, have regard to the policies in this PPS as material considerations which may supersede the policies in their development plan.
- 59 Paragraph 21 of PPS10 states that in deciding which sites and areas to identify for waste management facilities, waste planning authorities should: (i) assess their suitability for development against each of the following criteria: (a) the extent to which they support the policies in PPS10, (b) the physical and environmental constraints on development, including existing and proposed neighbouring land uses, (c) the cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential, and (d) the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport, and (ii) give priority to the re-use of previously-developed land, and redundant agricultural and forestry buildings and their curtilages.
- 60 Paragraphs 24 and 25 of PPS10 states that planning applications for sites that have not been identified, or are not located in an area identified, in a development plan document as suitable for new or enhanced waste management facilities should be considered favourably

when consistent with (a) the policies in PPS10, including the criteria set out in paragraph 21, and (b) the Surrey Waste Plan 2008.

- 61 Paragraphs 26 and 27 of PPS10 confirms that in considering planning applications for waste management facilities, waste planning authorities should concern themselves with implementing the planning strategy in the development plan and not with the control of processes which are a matter for the pollution control authorities. These paragraphs explain that planning and pollution control regimes are separate but complementary. Pollution control is concerned with preventing pollution through the use of measures to prohibit or limit the release of substances to the environment to the lowest practicable level. It also ensures that ambient air and water quality meet standards that guard against impacts to the environment and human health. The planning system controls the development and use of land in the public interest and should focus on whether development is an acceptable use of the land, and the impacts of those uses on the development and use of land. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.
- 62 Paragraph 29 of PPS10 advocates that when considering planning applications for waste management facilities waste planning authorities should consider the likely impact on the local environment and on amenity. These can also be concerns of the pollution control authorities and there should be consistency between consents issued under the planning and pollution control regimes.
- 63 Paragraph 36 of PPS10 stresses that waste management facilities in themselves should be well designed, so that they contribute positively to the character and quality of the area in which they are located. Poor design is in itself undesirable, undermines community acceptance of waste facilities and should be rejected.
- 64 Annex E of PPS10 states that in testing the suitability of sites and areas against the criteria set out in paragraph 20, waste planning authorities should consider the following factors (a) protection of water resources, (b) land instability, (c) visual intrusion, (d) nature conservation, (e) historic environment and built heritage, (f) traffic and access, (g) air emissions, including dust, (h) odours, (i) vermin and birds, (j) noise and vibration, (k) litter, and (l) potential land use conflict.

The South East Plan 2009

- 65 In line with national policy on waste the South East Plan adopts a resource management approach to waste reflecting the waste hierarchy of reduction, re-use, recycling and recovery of value before disposal is considered and working towards the concept of zero waste. The long term aspiration of which is the elimination of waste through product design, behaviour management and changes in the economy. The South East Plan 2009 sets targets for recycling and recovery and contains policies, the aim of which are to reduce waste growth and minimise the production of waste.
- 66 In recognition that there needs to be a substantial increase in recovery of waste and relative reduction in landfill in the region the South East Plan 2009 provides the following policy guidance:
- 67 Policy W5 of the South East Plan states that, '*A substantial increase in recovery of waste and a commensurate reduction in landfill is required in the region.*' Accordingly, the following targets for diversion from landfill of commercial and industrial waste needs to be achieved in the region: 2010 - 5.8 million tonnes per year; 2015 - 7.4 million tonnes per year; 2020 - 8.7 million tonnes per year and 2025 - 9.4 million tonnes per year. This policy goes on to discuss construction and demolition waste and provides regional diversion targets for this specific waste stream: 2010 – 10.1 million tonnes per year; 2015 – 10.4 million tonnes per year; 2020 – 10.7 million tonnes per year; 2025 - 10.9 million tonnes per year.

- 68 Policy W6 of the South East Plan states that the following targets for recycling of Construction and Demolition Waste should be achieved in the region: 2010 to 2015 - 6.1 million tonnes per year (50%); 2020 to 2025 - 7.3 million tonnes per year (60%). This policy also sets targets for the recycling of commercial and industrial waste in the region: 2010 - 4.5 million tonnes per year (50%); 5.5 million tonnes per year (55%); 2020 - 6.4 million tonnes per year (60%); 2025 - 7.3 million tonnes per year (65%).
- 69 Policy W7 of the South East Plan details that Surrey County Council should provide for an appropriate mix of development opportunities to support the waste management facilities required to achieve the targets set out in the South East Plan. The annual rates of Commercial and Industrial Waste to be managed in Surrey are: 2011 to 2015 - 903,000 tonnes; 2016 to 2020 - 982,000 tonnes; and 2021 to 2025 - 1,042,000 tonnes.
- 70 The supporting paragraph (10.27) to Policy W7 states, *“There is an immediate and acute shortfall in the capacity required to achieve the ambitious targets for recycling and other forms of recovery and the overall diversion from landfill. There needs to be a rapid increase in management capacity, and the mixture of facilities, and regional waste planning authorities must start to address this shortfall now. The urgency for this is compounded by the long lead-time for many facilities and difficulties in obtaining planning permission.”*
- 71 Policy W17 advocates that in identifying locations for waste management facilities Surrey County Council should give priority to safeguarding and expanding suitable sites with an existing waste management use and good transport connections. This policy goes on to state that waste management facilities should not be precluded from the Green belt.

The Surrey Waste Plan 2008

- 72 The Surrey Waste Plan comprises Core Strategy, Waste Development, and Waste Development Control policies. The Core Strategy sets out Surrey County Council’s approach to the location of waste management facilities following the requirements of PPS10 by establishing sequential principles for the location of waste management facilities, and an approach for development in the Green Belt. The Waste Development policies of the SWP contain site-specific proposals for development of waste management facilities. The policies are not specific to a particular waste stream but apply to all wastes.
- 73 Policy CW4 of the Surrey Waste Plan states that planning permissions will be granted to enable sufficient waste management capacity to be provided to: (a) manage the equivalent of the waste arising in Surrey, together with a contribution to meeting the declining landfill needs of residual wastes arising in and exported from London; and (b) achieve the regional targets for recycling, recovery and diversion from landfill by ensuring a range of facilities is permitted.
- 74 As with Policy W17 of the South East Plan 2009, Policy CW5 of the Surrey Waste Plan sets out as follows principles for considering the location of waste management facilities in respect of unallocated sites: (i) priority will be given to industrial/employment sites, particularly those in urban areas, and to any other suitable urban sites and then to sites close to urban areas and to sites easily accessible by the strategic road network, (ii) priority will be given over Greenfield land to previously developed land, contaminated, derelict or disturbed land, redundant agricultural buildings and their curtilages, mineral workings and land in waste management use, (iii) Areas of Outstanding Natural Beauty, Areas of Great Landscape Value, and sites with or close to international and national nature conservation designations should be avoided, and (iv) the larger the scale of development and traffic generation, the more important is a location well served by the strategic road network or accessible by alternative means of transport.
- 75 Policy WD2 of the Surrey Waste Plan states that planning permissions for development involving the recycling, storage, transfer, materials recovery and processing of waste will be granted (a) on land that has been used or has planning permission for industrial or storage

purposes provided that the development proposed meets the key development criteria and where very special circumstances can be demonstrated in accordance with the provisions of Policy CW6 for Development in the Green Belt.

Waste Management Issues Considerations

- 76 Surrey has one of the largest populations in England (over 1,000,000 people). It is one of the most urbanised shire counties with some 85% of people living in urban areas. It has a highly developed economy with higher than average income levels (paragraph 1.1 of the Surrey Waste Plan 2008). As such, the South East Plan 2009 estimates that total waste production in the region will grow from 24.5 million tonnes per annum to nearly 35 million tonnes per annum by 2025 (paragraph 1.3 of the Surrey Waste Plan 2008).
- 77 The Environment Agency undertook a survey of commercial and industrial waste in 2002/2003. This survey identified that around 1 million tonnes of commercial and industrial waste was generated in Surrey in 2008. A slight majority of this waste was reused, recycled or otherwise recovered, with just under half disposed of to landfill. Construction and demolition waste arisings in Surrey for 2002 were estimated to be 1.9 million tonnes, with 45% recycled, 31% sent to landfill, and the remaining 24% sent to 'exempt sites' (site which are exempt from requiring an Environment Agency waste management licence) such as agricultural improvement schemes, golf course contouring etc. (paragraph 1.2.1 of the Surrey Waste Plan 2008).
- 78 The application site subject to this report, bar some 0.036ha of previously developed land, is an existing waste management facility dealing with both commercial and industrial and construction and demolition wastes. The development permitted by planning permission Ref. GU10/1501 allows for the importation and processing of up to 30,000 tonnes of non-hazardous waste per annum. The applicant does not seek to change the nature of the waste (non-hazardous skip waste) to be imported to the facility nor the annual waste throughput.
- 79 The application site is located along and accessed off the A323 Guildford Road some 1.45km east of the centre of Normandy, 3.25km west of Guildford, 4km east of Ash, 9.7km northeast of Woking, and some 6.4km southwest of Aldershot, Hampshire. As such the application site is well related to the strategic road network given its location on the edge of Guildford and its proximity to the A3, A31, and A331.
- 80 According to the Guildford Local Plan 2003 (paragraph 2.3) the Borough of Guildford is Surrey's most populous District with a population of approximately 129,000. The two principal urban areas are the town of Guildford and in the west of the Borough the urban area of Ash. As a result, construction and demolition, and industrial and commercial waste arisings in these areas are likely to be high. The applicant indicates that waste imported to the application site is principally sourced from the boroughs of Guildford and Woking.
- 81 Planning Policy Statement 10 requires a framework in which communities take more responsibility for their own waste, and where sufficient and timely provision of waste management facilities to meet their needs is enabled. Paragraph B10 of the Surrey Waste Plan 2008 states that Surrey must provide sufficient waste management facilities to meet the needs of its population and economy and where possible these should be close to the source of waste and spread equitably across the County and that there needs to be a rapid increase in management capacity and in the mixture of facilities, in order to deliver an integrated approach to waste management. This urgency is compounded by the long lead-in time for the development of facilities (paragraph 1.6 of the Surrey Waste Plan 2008).
- 82 The applicant's intention is to continue to use the application site for the importation, deposit, storage and processing of some 30,000 tonnes of non-hazardous skips waste per annum. According to the applicant the changes proposed in respect of the existing facility have been brought about by changes in business activities, waste management legislation, and waste source segregation measures. Accordingly, Officers consider that the application site's

contribution to recycling and recovery of construction, demolition, industrial and commercial waste in Surrey would be valuable. Further, an increase in the number of waste management facilities within Surrey is likely to increase the landfill diversion rate and the rate of waste reuse, recycling and/or recovery in accordance with the Waste Strategy for England 2011.

- 83 Officers consider that the proposal subject to this report would continue to make a positive contribution to achieving the regional targets set by the South East Plan 2009 and to sustainable waste management overall by escalating waste up the waste hierarchy.

Waste Management Issues Conclusion

- 84 Having regard to paragraphs 45 to 83 above, Officers consider that there continues to be a demonstrable need for the development proposed and that the development satisfies the requirements of Planning Policy Statement 10, and Policies CW4, CW5 and WD2 of the Surrey Waste Plan 2008. Officers also consider that the development proposed would make a positive contribution towards meeting the targets set out in Policies W5, W6, W7, and W17 of the South East Plan 2009.

ENVIRONMENT AND AMENITY

- 85 The following section of this report considers the potential impact of the development proposed in terms of highways, traffic and access; heritage assets; noise; air quality; and visual and landscape impact.

Government Guidance

Planning Policy Statement 10 (PPS10) – Planning for Sustainable Waste Management

Planning Framework Policy 4 – Promoting Sustainable Transport

Planning Framework Policy 11 – Conserving and Enhancing the Natural Environment

Planning Framework Policy 12 – Conserving and Enhancing the Historic Environment

Development Plan Policies

South East Plan 2009

Policy CC1 – Sustainable Development

Policy NRM9 – Air Quality

Policy NRM10 – Noise

Policy W17 – Location of Waste Management Facilities

Policy BE6 – Management of the Historic Environment

Surrey Waste Plan 2008

Policy DC2 – Planning Designations

Policy DC3 – General Considerations

Guildford Borough Local Plan 2003

Policy G1(2) – Transport Provision, Access, Highway Layout and Capacity

Policy G1(3) – Protection of Amenities Enjoyed by Occupants of Buildings

Policy HE4 – New Development which Affects the Setting of a Listed Building

Highways, Traffic and Access Policy Context

The Framework

- 86 Policy 4 of the Framework states that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Paragraph 30 encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Paragraph 32 advocates that development should only

be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

87 Policy 11 at paragraph 123 states that planning decisions should aim to: (a) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, and (b) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development.

88 Policy 11 at paragraph 124 states that planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas.

Planning Policy Statement 10

89 PPS10 advises planning authorities to assess the suitability of sites for waste management facilities against certain criteria including the capacity of existing and potential transport infrastructure to support the sustainable movement of waste, and products arising from resource recovery, seeking where practicable and beneficial to use modes other than road transport. In testing the suitability of sites against the criteria Annex E of PPS10 states that planning authorities should consider such factors as the suitability of the road network and the extent to which the access would require reliance on local roads.

South East Plan 2009

90 Policy NRM9 of the South East Plan aims to secure continued improvements in air quality in the region and identifies that development control can assist in achieving improvements in local air quality in a number of ways including reducing the environmental impacts of transport.

91 Policy NRM10 of The South East Plan advocates that measures to address and reduce noise pollution will be developed at regional and local level through traffic management.

92 Policy W17 of the South East Plan states that facilities at existing sites and potential new sites should be assessed against characteristics including accessibility and transport connections, and be capable of meeting a range of locally based environmental and amenity criteria. Policy CC7 aims to ensure that the right infrastructure (which includes transport infrastructure) is provided to support new development. This involves assessment of the existing infrastructure and any improvements or new infrastructure that may be required, and if required means securing them.

The Surrey Waste Plan 2008

93 Policy DC3 of the Surrey Waste Plan requires that the traffic and access implications of development be taken into account in determining applications and for applicants to demonstrate that any those implications can be controlled and would not give rise to significant adverse affect on people, infrastructure and resources. In relation to traffic that would be generated by a proposal this information includes an assessment of the level and type of traffic that would be generated and as assessment of the impact of that traffic, the suitability of the access to the site and the highway network in the vicinity of the site including access to and from the primary route network.

Guildford Borough Local Plan 2003

94 Policy G1(2) advocates that development proposals should provide satisfactory access and highway layout, and ensure that the traffic generated by the development is compatible with the local road network. Moreover, appropriate provision should be made for pedestrian, cyclist and public transport facilities.

Highways, Traffic and Access Considerations

- 95 The application site is located along and accessed off the A323 Guildford Road some 1.45km east of the centre of Normandy, 3.25km west of Guildford, 4km east of Ash, 9.7km northeast of Woking, and some 6.4km southwest of Aldershot, Hampshire. As such the application site is well related to the strategic road network given its location on the edge of Guildford and its proximity to the A3, A31, and A331.
- 96 The applicant states that the application site would generate some 26 HGV trips per working day, which equates to some 52 HGV movements per day. The applicant anticipates that material to be taken off site for reuse, further processing, or disposal would generate a further 12 HGV trips, which equates to some 24 HGV movements. Overall the application site would attract some 76 HGV movements per day which, according to the applicant, would include HGV's returning to their base at the end of the working day. In respect of non-HGV vehicular traffic, the applicant expects 10 employees to create 20 vehicle movements per day. Accordingly, the application site would generate some 96 vehicle movements per day including HGV movements.
- 97 The 96 vehicle movements to be generated by the proposed facility are congruent to the vehicle movements currently associated with the existing facility. Accordingly, Surrey County Council Transportation Development Control has not raised objection to the proposal subject to conditions. These conditions have been requested so that the proposed development would not prejudice highway safety or cause inconvenience to other highway users. These conditions include implementation and maintenance of vehicle parking provision, space for loading and unloading of vehicles and the turning of vehicles in accordance with the applicant's drawings Ref. PL/007 – HGV Tracking dated August 2012, and B/PL/004 – Proposed Block Plan dated October 2012.
- 98 The applicant proposes to provide 9 x car parking spaces, 1 x extra-wide car parking space (for persons with physical impairments), 5 x motorcycle spaces and 5 x cycle storage spaces. Assessed against parking provided in respect of the existing facility, the applicant is proposing to provide an additional 3 car parking spaces. Cycle spaces and parking provision for motorcycles remains unchanged.
- 99 The application site measures some 0.34ha in total which equates to some 3,400m². The existing facility has 10 existing employees. This employment figure would not change in respect of the proposed facility. Accordingly, the applicant proposes to provide 1 car/motorcycle parking space for every 226m² of site area and 1.5 parking spaces for each respective employee. Once all employees, assuming that they all commute to the application site in individual vehicles (cars or motorcycles), have parked their respective vehicles there would be a balance of 5 car/motorcycle parking spaces available for site visitors in addition to the proposed cycle storage spaces.
- 100 HGV parking is to take place in the north-western corner of the application site alongside the storage of empty and full skips as shown on drawing Ref. B/PL/004 Proposed Block Plan dated August 2012. Further informal overspill parking is to be provided for HGV's directly opposite the application site's access.
- 101 Condition 5 of planning permission Ref. GU10/1501 required that the applicant modify the access off the A323 Guildford Road in accordance with drawing Ref. CS/028312/B/PL/004 Rev F and thereafter maintained. Surrey County Council Transportation Development Control has confirmed that these modifications have taken place. Accordingly, Officers consider that the application site's access off the A323 is suitable in respect of the proposed development.
- 102 Should planning permission be granted for the development subject to this report Officers consider it reasonable and proportionate to impose a condition, in the interests of public

amenity and to comply with the terms of the applicant's proposal, limiting the maximum vehicle movements (both HGV and non-HGV vehicles) to and from the application site. Accordingly, Officers consider that imposing a maximum daily allowance of 100 vehicle movements in total would be proportionate and reasonable relevant to the nature and scale of the development proposed.

Highways, Traffic and Access Conclusion

103 Having regard to the contents of paragraphs 86 to 102 above and the conditions proposed, Officers consider that the proposal satisfies the requirements of PPS10; Policies NRM9, NRM10, CC7 and W17 of the South East Plan 2009; Policy DC3 of the Surrey Waste Plan 2008, and Policy G1(2) of the Guildford Local Plan 2003.

Heritage Assets Policy Context

The Framework

104 Paragraph 128 of the Framework states that Surrey County Council should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The Framework advises that the level of detail to be provided by the applicant should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

105 Paragraph 129 of the Framework advocates that Surrey County Council should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. Surrey County Council should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

106 Paragraph 131 of the Framework states that in determining planning applications, Surrey County Council should take account of the desirability of new development making a positive contribution to local character and distinctiveness.

The South East Plan 2009

107 Policy BE6 of the South East Plan states that Surrey County Council should support proposals which protect, conserve and, where appropriate, enhance the historic environment and the contribution it make to local and regional distinctiveness and sense of place. This policy goes on to state that proposals that make sensitive use of historic assets through regeneration, particularly where these bring redundant or under-used buildings and areas into appropriate use should be encouraged.

The Surrey Waste Plan 2008

108 Policy DC2 of the Surrey Waste Plan makes clear that planning permission will not be granted for waste related development where this would endanger, or have a significant adverse impact, on the character, quality, interest or setting of listed buildings.

Guildford Borough Local Plan 2003

109 Policy HE4 states that planning permission will not be granted for development that adversely affects the setting of a listed building by virtue of design, proximity or impact on significant views.

Heritage Assets Considerations

- 110 Two 16th century Grade II Listed buildings are located within close proximity to the application site. Chapel Farm Cottage is located some 11m from the southern boundary of the application site, and The Homestead is situated some 113m from the southern boundary of the application site. The applicant does not discuss the listed buildings in their planning statement.
- 111 Surrey County Council's Historic Buildings Officer (HBO) has assessed the setting of the listed buildings in relation to the proposal having regard to the existing lawful waste management use and his previous visit to the listed buildings in 2005.
- 112 The HBO considers that the visual impact of the proposed development would not have a material impact on the already compromised historic setting of Chapel Farm Cottage. The HBO does not consider that the proposal would have any impact upon the setting of The Homestead given its location relevant to the application site.
- 113 The HBO suggests replacing the palisade fence and existing coniferous screen planting along the western boundary with native screen planting so as to improve the setting of Chapel Farm Cottage. In addition the HBO has requested that the applicant install rubber tracks on tracked vehicles and plant and replace vehicular and plant reversing beepers with white noise signals.
- 114 Officers have considered the replacement of the palisade fencing and existing coniferous screen planting along the western boundary of the application site. The land on which the existing screen planting is located is not in the ownership or control of the applicant. Chapel Farm Cottage is already surrounded by lawful industrial uses, it is situated adjacent to an 'A' road, and there is no direct visual relationship between the palisade fencing and the listed building given the building's location relevant to the fencing. The proposal subject to this report relates to an existing waste management facility, the principle of which has already been established and accepted by Surrey County Council (see planning permission Ref. GU10/1501). The setting of Chapel Farm Cottage according to the HBO has already been compromised by the surrounding land uses.
- 115 By removing the existing screen planting the adverse visual impact of the development would be significantly magnified and noticeable for several years whilst relatively slow establishing native plant species grow to a height so as to screen the application site. The expense, logistics and work involved in removing the existing screen planting will almost certainly, albeit for a limited duration, disrupt the local highway network particularly the A323 Guildford Road therefore inconveniencing local highway users. The A323 is a fast road with a speed limit of 50 miles per hour. Vehicles pass the application site and Chapel Farm Cottage at speed and are therefore unlikely to notice the building or the application site given existing screening and boundary treatments. Any works required to be undertaken by the applicant on highway land would need to be subject to a separate legal agreement. Accordingly Officers do not consider that requiring the applicant to replace the existing coniferous screen planting, having regard to the preceding considerations and the existing lawful waste management use, is warranted, proportionate, or that it would compensate for the already compromised setting of Chapel Farm Cottage.
- 116 Should planning permission be granted for the development proposed, Officers do consider it proportionate and reasonable to require the application to ensure that all tracked vehicles and plant use rubber tracks, and that all vehicles, where relevant, replace reversing beepers with white noise signals. Officers consider that these measures would mitigate the existing noise impact on the setting of Chapel Farm Cottage (see paragraphs 118 to 138 below).
- 117 Guildford Borough Council have not raised objection to the proposal subject to conditions relating to local amenity.

Heritage Assets Conclusion

118 Having regard to paragraphs 104 to 117 above, Officers do not consider that the proposal subject to this report would endanger, or have a significant adverse impact, on the character, quality, interest or the setting of Chapel Farm Cottage or The Homestead. Accordingly Officers consider that the development satisfies Policy BE6 of the South East Plan 2009, Policy DC2 of the Surrey Waste Plan 2008, and Policy HE4 of the Guildford Borough Local Plan 2003.

Noise Policy Context

The Framework

119 Policy 11 at paragraph 120 of the Framework states that in seeking to prevent unacceptable risks from noise pollution, planning decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from noise pollution, should be taken into account.

120 Paragraph 122 of the Framework advocates that in ensuring that the site is suitable for its new use local planning authorities should focus on whether the development itself is an acceptable use of the land and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. It goes on to state that Surrey County Council should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

121 Policy 11 at paragraph 123 of the Framework states that planning decisions should aim to: (a) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development, and (b) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise.

Planning Policy Statement 10

122 In relation to noise PPS10 Annex E states that when determining the suitability of sites for waste management facilities, considerations for waste planning authorities shall include the proximity of sensitive receptors. The operation of waste management facilities can produce noise both inside and outside buildings. Intermittent and sustained operating noise may be a problem if not kept to acceptable levels and particularly if night-time working is involved.

The South East Plan 2009

123 Policy NRM10 of The South East Plan advocates that measures to address and reduce noise pollution will be developed at regional and local level through traffic management and requiring sound attenuation measures.

The Surrey Waste Plan 2008

124 Policy DC3 of the Surrey Waste Plan requires that the noise implications of development be taken into account in determining applications and for applicants to demonstrate that any those implications can be controlled and would not give rise to significant adverse affect on people, infrastructure and resources. It requires planning applications to include assessments and information to demonstrate the likely impacts on surrounding land and where necessary, identify appropriate mitigation so as to minimise or avoid any material adverse impact and compensate for any loss.

Guildford Borough Local Plan 2003

125 Policy G1(3) of the Borough Local Plan requires that the amenities enjoyed by occupants of buildings are protected from unneighbourly development in terms of noise.

Noise Considerations

126 The applicant commissioned Vanguardia Consulting to undertake a noise assessment of the proposal subject to this report so as to demonstrate that the proposed development would continue to comply with Condition 4 of planning permission Ref. GU10/1501. This condition specifies that:

The level of noise arising from any operation, plant or machinery on the site, when measured at, or recalculated as at, a height of 2.5 metres above ground level and 3.6 metres from the facade of a residential property or other noise sensitive building shall not exceed the following values after correction for the characteristics of the noise as defined in BS4142 paragraph 8.2 during any 30 minute period.

*Chapel Farm Mobile Home Park - 44LAeq
Chapel Farm Cottage – 48LAeq*

Allowance should be made for any noise not associated with the permitted development such as passing traffic, overflying aircraft, activity on other sites and activities of local residents. If the noise, properly adjusted for characteristics or noise from other sources, exceeds the limit figures above, immediate action should be taken to control the noise emission to comply with the specified limits. This would entail immediately stopping that plant identified as the cause of the breach. The use of the identified plant shall not recommence until corrective action has been undertaken which has been approved in writing by the County Planning Authority in writing giving details of the initial noise assessment, the action taken, and the resultant assessment of the noise exposure for local residents.

127 The assessment, based on two separate site visits in February 2012, comprised simultaneous measurements of the noise arising from the various activities proposed on the application site, Chapel Farm Cottage and Chapel Farm Mobile Home Park. Chapel Farm Cottage and the location (closest to the application site boundary) at Chapel Farm Mobile Home Park are considered 'sensitive receptors'. The various on-site activities measured included HGV's entering the site fully loaded, unloading of full skips from HGV's, manoeuvring of loaded and unloaded HGV's on-site, manoeuvring of tracked plant around the site, sorting of waste materials in the existing building with open doors, and operation of soil screening and concrete crushing plant. These measurements also took into account the proposed 2.5m high acoustic wall located along the southern boundary of the application site and extending along the northern and eastern boundaries of the northernmost part of Chapel Farm's residential curtilage.

128 The applicant's assessment reports that the dominant noise source within the vicinity of the application site is the busy A323 Guildford Road which runs adjacent to the eastern boundary of the application site. Local background noise also includes operations undertaken at the adjacent Aldershot Care Spares and vehicles accessing this facility, the nearby firing range, overflying aircraft, birdsong, and low level activity associated with the mobile home park. Ambient noise (background noise) measurements taken in February 2012 were recorded at levels higher than the level of noise permitted by Condition 4 of planning permission Ref. GU10/1501 (48db). The applicant's report asserts that these measurements ranged between 65db to 67db at Chapel Farm Cottage, and 50db to 52db at Chapel Farm Mobile Home Park. Accordingly the applicant's assessment concludes that the proposed development would not make a significant contribution to the local noise environment.

- 129 So as to further mitigate the impact of noise arising from the application site, the applicant proposes to install rubber tracks on all tracked plant. Officers also consider it proportionate and reasonable to require the applicant to replace vehicular reversing beepers with white noise signals thereby providing further mitigation to existing noise levels. Officers consider that these measures could be successfully secured by way of condition should planning permission be granted for the proposal.
- 130 Surrey County Council's Environmental Noise Consultant (ENC) visited the site in December 2012 so as to witness the proposed development. At the time of the visit both soil screening and concrete crushing plant was in use in their proposed locations on the application site. Whilst concrete crushing and soil screening was taking place the ENC visited Chapel Farm Mobile Home Park and spoke to local residents. The ENC has reported that the local residents he spoke to confirmed that the resulting noise impacts (clunks from the plant's mechanical arms and the loading of screening and crushing buckets) of site activities were not considered to be a problem. The ENC measured noise levels at Chapel Farm Mobile Home Park of 45 LAeq (crusher) and 43 LAeq (screener) respectively. Adjusting these measurements for ambient noise levels the ENC calculates that the true noise level of crushing and screening activities at 41 LAeq and 42 LAeq respectively. These levels are well within that permitted by Condition 4 of planning permission Ref. GU10/1501.
- 131 Guildford Borough Council has not objected to the proposal subject to the development meeting the noise controls imposed by Condition 4 of planning permission Ref. GU10/1501. The Environment Agency have not objected to the proposed development.
- 132 Officers remain concerned about the height of the application site's eastern and southern boundary treatments (3.2m high and 2.5m high respectively) considering that mobile plant is proposed to be used as part of the proposal. The mobile processing plant comprises a 360 machine with a screening or crushing bucket attached to the end of its hydraulic arm. This arm, and by association the screening or crushing bucket, can easily be extended in a way which results in the actual screening or crushing process taking place above the height of the application site's boundaries including the acoustic barrier. Accordingly, should processing of inert waste take place above the height of the southern and eastern boundaries it is likely that the noise controls imposed by Condition 4 of planning permission Ref. GU10/1501 would be exceeded.
- 133 The applicant proposes to erect five external storage bays, measuring 17.5m (width) x 10.5m (depth) x 3m (height) in total, within the southeastern corner of the application site. These storage bays are to be formed of interlocking concrete blocks and would be situated parallel to the adjacent 3.2 meter high concrete boundary wall so that the open side of the bays face to the west.
- 134 The applicant also proposes to erect two external storage bays, measuring 13m (width) x 3.5m (depth) x 3m (height) in total, along the northern boundary of the application site. These storage bays are to be formed of interlocking concrete blocks and would be situated parallel to the adjacent 2.5m high palisade fence so that the open side of the bays face to the south. These bays are to be located between the HGV/skip storage area and the existing building. The northern boundary of the application site lies adjacent to a dense row of established conifers with agricultural land and an existing metal clad agricultural building beyond.
- 135 The applicant explains that skip waste would be initially deposited within the existing building where it would be sorted into its respective waste streams (paper, plastic, soil, brick, tiles, metal etc.). Inert waste (soils, bricks, concrete, tiles etc.) would then be stored and processed externally in the proposed concrete bays, whilst other materials are to be processed (baled, stockpiled etc.) within the existing building with any waste residue destined for landfill bulked directly into skips. Drawing Ref. B/PL/004 – Block Plan dated

August 2012 labels the bays proposed on the northern boundary as being 'soil bays' whilst the bays located to the south are labelled as being 'storage bays'. The concrete bays to the north would be used for storing and processing 'high-quality' soils whilst the concrete bays to the south would be used for concrete, low quality soils, brick etc. The applicant has explained that it is not possible to designate each individual bay to a specific type of inert waste due to the varying composition of skip wastes and the need to maintain operational flexibility.

- 136 At the time of his site visit the ENC witnessed the screening of soil taking place within the southeastern corner of the application site and his measurements were undertaken on this basis. The ENC reports that the plant demonstration at the time of his visit included a 360 working at ground level with its processing bucket held below the top of the concrete wall and acoustic fence.
- 137 Given the capacity of the mobile plant to extend processing operations above the height of the southern and eastern boundaries and therefore adversely affect local amenity by way of noise Officers consider it proportionate and reasonable, should planning permission be granted, to limit all processing operations undertaken within the southeastern corner of the application site to a height not exceeding that of the acoustic barrier i.e. 2.5 meters. It follows that a further condition prohibiting mobile plant from working above ground level, i.e. on top of stockpiles, should be imposed on any planning permission granted. Officers do not consider that a height limit is necessary in respect of processing activities to take place along the northern boundary of the application site having regard to adjacent land and the existing building. These conditions would ensure that noise levels of processing activities to be carried out in the open do not exceed the noise limit of 48db or cause any significant adverse impact on local amenity or the environment.

Noise Conclusion

- 138 Taking into consideration the applicant's noise assessment, the consultation response received from Surrey County Council's Environmental Noise Consultant, the mitigation measures proposed by the applicant, the noise controls imposed on the application's sites Environment Agency permit (Ref. EPR/DP3297EE), and the additional planning controls that would be imposed upon any planning permission granted, Officers consider that the development proposed satisfies the requirements of Planning Policy Statement 10, Policy NRM10 of The South East Plan 2009, Policy DC3 of the Surrey Waste Plan 2008, and Policy G1(3) of the Guildford Borough Local Plan 2003.

Air Quality Policy Context

The Framework

- 139 Policy 11 at paragraph 120 of the Framework states that in seeking to prevent unacceptable risks from air pollution, planning decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of air pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from air pollution, should be taken into account.
- 140 Paragraph 122 of the Framework advocates that in ensuring that the site is suitable for its new use Surrey County Council should focus on whether the development itself is an acceptable use of the land and the impact of the use, rather than the control of processes or emissions themselves where these are subject to approval under pollution control regimes. It goes on to state that local planning authorities should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities

Planning Policy Statement 10

141 PPS10 Annex E identifies air emissions, including dust, as an issue needing to be considered when assessing the suitability of a site as a location for waste development and refers to the proximity of sensitive receptors and the extent to which adverse emissions can be controlled.

The South East Plan 2009

142 Policy NRM9 of the South East Plan aims to secure continued improvements in air quality in the region and identifies that development control can assist in achieving improvements in local air quality in a number of ways including encouraging the use of best practice during construction activities to reduce levels of dust and other pollutants and reducing the environmental impacts of transport.

The Surrey Waste Plan 2008

143 Policy DC3 of the Surrey Waste Plan requires that the air quality implications of development be taken into account in determining applications and for applicants to demonstrate that any those implications can be controlled and would not give rise to significant adverse affect on people, infrastructure and resources. It requires planning applications to include assessments and information to assess these impacts on surrounding land and where necessary, identify appropriate mitigation so as to minimise or avoid any material adverse impact and compensate for any loss.

Guildford Borough Local Plan 2003

144 Policy G1(3) of the Borough Local Plan requires that the amenities enjoyed by occupants of buildings are protected from unneighbourly development in terms of dust emissions.

Air Quality Considerations

145 The applicant has commissioned Capita Symonds to undertake an air quality (dust and odour) assessment of the proposal subject to this report so as to demonstrate that the proposed development would not significantly adversely affect local air quality and to make recommendations on mitigation measures in respect of air quality.

146 The assessment highlights that the potential impacts on local air quality associated with the development are: (a) emission of nitrogen dioxide and particulate matter from traffic associated with the development, (b) emissions of nuisance dust, and (c) emissions of odour.

147 In respect of traffic emissions the development subject to this report does not include an increase in vehicle movements. Accordingly, having regard to the development permitted by planning permission Ref. GU10/1501, the applicant's air quality assessment has not considered the impact on local air quality by way of vehicle emissions. Surrey County Council's Air Quality Consultant (AQC) accepts this approach.

148 In respect of dust emissions the applicant's assessment asserts that these emissions are likely to result from construction activities and the operation of the waste management facility itself. Construction activities would be limited to the roofline of the existing building which comprises structural work relating to metal cladding and steel frames. Accordingly construction activities are unlikely to give rise to dust emissions. The operation of the waste management facility would however be likely to give rise to dust emissions as a result of the movement of waste to and from the facility, storage of waste under certain conditions, the handling and processing of waste materials, and wind scouring of exposed waste surfaces.

- 149 The main determinants of unmitigated dust annoyance are the weather and the distance to the nearest receptor. With mitigation dust annoyance may occur within 200m of dust generating activities. The suspension of particles in the air is dependant upon the surface characteristics, weather conditions, and on site activities. Dust effects will be greatest during dry, windy weather, and least during wet, calm conditions. The potential for dust effects is also dependant upon the proximity of sensitive receptors. Concentration of dust particles decrease rapidly with distance from the source due to dispersion and deposition and therefore significant dust annoyance is usually limited to within 200m of a site.
- 150 The applicant's assessment uses the dust sensitive receptors as illustrated by the now replaced Minerals Planning Policy Statement 2 – Controlling and Mitigating the Environmental Effects of Minerals Extraction in England Annex 1: Dust. Here it is stated that hospitals/clinics, retirement homes, hi-tech industries, painting and furnishing, and food processing uses have high sensitivity to dust; schools, residential areas, food retailers, greenhouses and nurseries, and offices uses have medium sensitivity to dust; whilst farms, light and heavy industry, and outdoor storage uses have a low sensitivity to dust.
- 151 Given their respective proximities to the application site the following sensitive receptors were identified in the applicant's assessment: (a) Chapel Farm Cottage, (b) Chapel Farm Eggs, (c) Aldershot Care Spares, (d) and Chapel Farm Mobile Home Park. The applicant's assessment has analysed long-term wind and rainfall data for the local area so as to ascertain the potential for dust annoyance arising from the development proposed.
- 152 The applicant's assessment concludes that the proposed facility has the potential for significant dust emissions during operation. However the majority of sensitive receptors within the vicinity of the application site are located upwind, 44% of the year there is sufficient rainfall for natural dust suppression, and for 36% of the year winds are not great enough for the uptake of dust. The assessment also states that there would be periods when sufficient dust may cross the site boundaries and cause temporary annoyance and that this is likely to be in the Summer months when higher temperatures evaporate moisture more readily. The applicant has proposed to incorporate a Dust Action Plan (DAP) into their existing Site Management System so as to mitigate the affects of dust emissions arising from the development particularly in dry Summer months. Accordingly the applicant's assessment, which is based upon the mitigation measures specified in the applicant's DAP, concludes that it is unlikely that emissions of dust from the facility would cause a local nuisance. Officers consider that the control measures and best practice put forward by the applicant in the DAP can be conditioned on any planning permission granted.
- 153 In respect of odour the applicant's assessment concludes, having regard to the nature of the wastes associated with the proposed development, that it is unlikely that the development proposed would give rise to odour to such a degree so as to become a local nuisance. However, the assessment does acknowledge that there is the potential for green waste to be received on site. Accordingly, the applicant proposes to include the 'first in first out' principal into the Site Management System so as to reduce the potential of causing a local nuisance by way of odour.
- 154 Surrey County Council's Air Quality Consultant (AQC) has assessed the development proposed in conjunction with the applicant's Air Quality Assessment. No objection to the development is raised by the AQC subject to the applicant's suggested DAP being subject to a planning condition. The AQC considers the applicant's DAP to be comprehensive. Guildford Borough Council have not raised objection to the development on air quality grounds and they have confirmed that there is no complaint history relating to the waste management facility in respect of dust or odour. The Environment Agency has not objected to the proposal.

Air Quality Conclusion

155 Having regard to paragraphs 139 to 154 above Officers consider that the development proposed satisfies the requirements of Planning Policy Statement 10, Policy NRM9 of the South East Plan 2009, Policy DC3 of the Surrey Waste Plan 2008, and Policy G1(3) of the Borough Local Plan 2003.

Landscape and Visual Impact Policy Context

The Framework

156 *Paragraph 109 of the Framework sets out that the planning system should contribute to and enhance the natural and local environment by (i) recognising the wider benefits of ecosystem services, and (ii) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land where appropriate. It goes on to state at paragraph 111 that planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brown field land), provided that it is not of high environmental value.*

The South East Plan 2009

157 Policy CC6 of the South East Plan states that, *'Actions and decisions associated with development and use of land will actively promote the creation of sustainable and distinctive communities and that this will be achieved by developing and implementing a local shared vision which respects, and where appropriate enhances, the character and distinctiveness of settlements and landscapes throughout the region.'*

The Surrey Waste Plan 2008

158 Policy DC3 of the Surrey Waste Plan requires that the visual and landscape implications of development be taken into account in determining applications and for applicants to demonstrate that any those implications can be controlled and would not give rise to significant adverse affect on people, infrastructure and resources. It requires planning applications to include assessments and information to assess these impacts on surrounding land and where necessary, identify appropriate mitigation so as to minimise or avoid any material adverse impact and compensate for any loss.

Landscape and Visual Impact Considerations

159 The 2020 recycling facility is an existing waste management facility subject to planning permission Ref. GU10/1501. This planning permission is a variation of planning permission Ref. GU09/2057 which allowed for the waste management development to be carried out including the raising of the roof height of the lower part of the existing building to match the higher part, replacement of two smaller workshop roller shutter doors with taller versions to match the existing taller doors, and removal of the two centre roller shutters to be replaced with a wall matching the existing façade. The external lighting proposed in respect of the development subject to this report is congruent to that permitted by planning permission Refs. GU10/1501 and GU09/2057.

160 The application subject to this report seeks planning permission for these exact changes as previously approved by planning permissions Ref. GU10/1501 and GU09/2057. The applicant does not propose to amend or alter the existing artificial lighting arrangements as approved by planning permission Ref. GU10/1501.

161 The application site's northern and western boundary treatments are proposed to be altered by replacing a 2.1m high post and wire fence along the northern and western boundaries with a 2.5m high palisade fence which is to be screened with green mesh.

162 The 0.036ha of land to be included within the application site area lies within the southeastern corner of the application site and cannot be seen from any adjacent land

given the existing Penrhyn bungalow and the application site's existing boundary treatments on its eastern and southern boundaries.

163 The development proposed does not involve the use of undeveloped land, rather the proposal amounts to an extension of an existing waste management facility. As such, the proposal does not involve the introduction of a waste management facility into the landscape. The principal extension proposed i.e. raising of part of the existing building's roof height has already been accepted in principle by Surrey County Council (Ref. GU09/2057). Guildford Borough Council has not objected to the proposal on landscape or visual grounds.

Landscape and Visual Impact Conclusion

164 Having regards to paragraphs 156 to 163 above Officers consider the development proposed to be acceptable relevant to Policy CC6 of the South East Plan 2009 and Policy DC3 of the Surrey Waste Plan 2008.

METROPOLITAN GREEN BELT

Government Guidance

Planning Framework Policy 9 – Protecting Green Belt Land

Development Plan Policy

The South East Plan 2009

Policy SP5 – Green Belts

Surrey Waste Plan 2008

Policy CW6 – Development in the Green Belt

Guildford Borough Local Plan 2003

Policy RE2 – Development within the Green Belt

Green Belt Policy Context

The Framework

165 Paragraph 79 of the Framework establishes the importance of Green Belts. There it is stated that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that the essential characteristics of Green Belts are their openness and their permanence.

166 Paragraph 80 of the Framework states that Green Belt serves five purposes: (a) to check the unrestricted sprawl of large built-up areas, (b) to prevent neighbouring towns merging into one another, (c) to assist in safeguarding the countryside from encroachment, (d) to preserve the setting and special character of historic towns, and (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

167 Paragraph 87 of the Framework states that as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 88 of the Framework states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, and goes on to state that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

168 The term waste is defined for present purposes in s336 of the 1990 Act as, 'any substance or object which the holder discards or intends or is required to discard.' Waste development is not included in the categories of development as set out in paragraph 90 of

the Framework that is appropriate in the Green Belt. Accordingly, the development subject to this report is inappropriate development in the Green Belt.

The South East Plan 2009

169 The South East Plan states that, *'Government has confirmed its continuing commitment to the Green Belt as an instrument of planning policy...'* Policy SP5 of the South East Plan seeks to protect the five main functions of the Green Belt and confirms that the broad extent of the Green Belt in the region is appropriate and will be retained and supported.

The Surrey Waste 2008

170 Policy CW6 of the Surrey Waste states that, *'There will be a presumption against inappropriate development of waste management facilities in the Green Belt except in very special circumstances. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations'*. Policy CW6 goes on to state that, *'the following considerations may contribute to very special circumstances: (i) the lack of suitable non-Green Belt sites, (ii) the need to find locations well related to the source of waste arisings, (iii) the characteristics of the application site, and (iv) the wider environmental and economic benefits of sustainable waste management, including the need for a range of sites.*

The Guildford Borough Local Plan 2003

171 Policy RE2 of the Guildford Local Plan makes clear that planning permission will not be granted for inappropriate development in the Green Belt.

Green Belt Considerations

172 The application site measures some 0.34ha in total of which 0.036 (10%) is not being used for waste related development. Accordingly, some 0.3ha of the application site already benefits from planning permission for waste related development in the Green Belt.

173 Despite the existing waste management facility, the proposal in its entirety is inappropriate development in the Green Belt. It is industrial in nature and causes harm to the openness of the Green Belt and undermines the reasons for including land within the Green Belt. The onus is upon the applicant to demonstrate factors which amount to 'very special circumstances' which clearly outweighs the harm caused to the Green Belt by reason of inappropriateness and any other harm. Officers consider that the harm to the openness of the Green Belt in this case to be relevant to the harm caused by the existing lawful waste management use and it's associated existing structures/buildings.

Very Special Circumstances

174 According to the applicant several factors relevant to the proposal amounts to 'very special circumstances': (a) the lack of alternative suitable sites outside the Green Belt and/or on industrial estates within the Green Belt, and (b) the economic and wider benefits of sustainable waste management.

175 In respect of the lack of alternative suitable sites outside the Green Belt the applicant has undertaken a detailed alternative site assessment. This assessment, based on the applicant's specified requirements for a waste management site, assessed eleven potential alternative sites in the borough of Guildford including the application site. According to the applicant's assessment the most suitable site is the application site subject to this report. The remaining ten sites have been dismissed by the applicant for various reasons including: the absence or lack of suitable buildings, the lack of a long-lease option, inadequate surface area, and the absence of a weighbridge facilities.

- 176 In terms of the economic and wider benefits of sustainable waste management the applicant has advanced a number of arguments. These include the continued diversion of waste from landfill, driving waste up the waste hierarchy, and continued provision of employment.
- 177 The application site subject to this report, bar some 0.036ha, is being lawfully used for waste management purposes. This existing use attracts vehicle movements including HGV's, and principally comprises two buildings, a fully concreted working surface with sealed surface water drainage system, boundary fences and a boundary wall, and the open storage of waste materials, plant, vehicles and waste receptacles.
- 178 The proposal subject to this report does not seek to introduce any further buildings/structures into the Green Belt rather, it seeks permission to extend the height of the southern half of the existing building's roof to match that of the higher northern part in addition to amending its access arrangements by replacing and amending existing roller shutters. Open storage of plant, vehicles, waste materials and waste receptacles would continue to take place in addition to the open processing of materials.
- 179 Surrey County Council has previously accepted (Refs. GU10/1501 and GU09/2057) that there have been 'very special circumstances' to allow the waste management use to be undertaken in the Green Belt. Officers do not consider that the current proposal, relative to the existing waste management use, is such that the harm caused to the Green Belt by the existing facility is exacerbated to any significant degree or that the openness of the Green Belt is significantly undermined.

Green Belt Conclusion

- 180 Having regard to the conclusions of the alternative site assessment produced by the applicant, the characteristics of the application site, the obvious economic and wider benefits of sustainable waste management, and the continued need for the development (see paragraphs 45 – 84 above), Officers consider that there are factors which amount to 'very special circumstances' outweighing the relative harm to the Green Belt and any other harm such that planning permission can be granted for the development proposed subject to conditions.
- 181 Although the proposal remains a departure from the development plan Officers consider that it does satisfy the policy requirements of Policy SP5 of the South East Plan 2009, Policy CW6 of the Surrey Waste Plan 2008, and Policy RE2 of the Guildford Local Plan 2003.

HUMAN RIGHTS IMPLICATIONS

- 182 The Human Rights Act Guidance for Interpretation, contained in the Preamble to the Agenda is expressly incorporated into this report and must be read in conjunction with the following paragraph.
- 183 The Officer's view is that this application does not engage any of the articles of the Convention and has no human rights Implications.

CONCLUSION

- 184 The proposal subject to this report seeks planning permission to change of use of some 0.036ha of previously developed land so as to allow the use of some 0.34ha of land in total for the receipt, processing and distribution of up to 30,000 tonnes per annum of non-hazardous skip wastes; repair and maintenance of 2020 Recycling and Associates' vehicles, the storage of full and empty skips awaiting hire; the erection of seven precast concrete external storage bays; alterations to the existing workshop building including the raising of roof height and replacement of three smaller workshop roller shutter doors with

taller versions; erection of a 2.5m galvanised steel palisade fence on the western and northern boundaries; and the repositioning of the 2.5m high acoustic barrier on the southern boundary.

- 185 The application site subject to this report, bar some 0.036ha of previously developed land, is an existing waste management facility dealing with both commercial and industrial and construction and demolition wastes. The development permitted by planning permission Ref. GU10/1501 allows for the importation and processing of up to 30,000 tonnes of non-hazardous waste per annum. Officers consider that proposal subject to this report would continue to make a positive contribution to achieving the regional targets set by the South East Plan 2009 and to sustainable waste management overall.
- 186 Officers consider it reasonable and proportionate to impose a range of conditions, in the interests of public amenity, highway safety, and to ensure that the development complies with the applicant's proposal, controlling the development should planning permission be granted. Subject to these conditions Offices consider that the development proposed, relevant to the existing waste management facility, would not have a significant adverse impact on local amenity or heritage assets such that planning permission should be refused.
- 187 Guildford Borough Council, Surrey County Council Transportation Development Control, and the Environment Agency have not objected to the proposal subject to conditions.
- 188 The applicant has advanced a number of factors which Officers consider amounts to 'very special circumstances' and that these factors outweigh the harm to the Green Belt in addition to any other harm identified in paragraphs 85 – 164 above. The proposal does not seek to change the volume or nature of waste to be received by the facility or the activities to take place on the application site. The application seeks permission to rearrange the site layout and undertake some unauthorised activities in the open. The proposal does include an additional area of some 0.036ha of land currently not in waste management use, however the incorporation of this additional area of land into the waste management site does satisfy the policy requirements of W17 of the South East Plan 2009 and Policy CW5 of the Surrey Waste Plan 2008 (see paragraphs 45 – 84 above).

RECOMMENDATION

- 189 Officers recommend that planning application Ref. GU12/P/01887 be **GRANTED** subject to the following conditions:

Conditions:

1. The development hereby permitted shall begin before the expiration of three years from the date of this decision. Written notification of the date of commencement shall be sent to the County Planning Authority within 7 days of such commencement.
2. The development hereby approved shall be carried out and maintained in all respects strictly in accordance with the following plans/drawings:

Drawing: B/PL/001 - Application Site Location dated August 2012;

Drawing: B/PL/004 - Proposed Block Plan dated August 2012;

Drawing: B/PL/002 - Proposed Redline Boundary Plan dated August 2012;

Drawing: B/PL/010 - Acoustic Barrier on Site Boundary dated September 2012;

Drawing: B/PL/033 - Previously Consented Elevations and Proposed Elevations dated August 2012; and

Drawing: B/PL/003 - Current and Proposed Elevations dated April 2012; and

Drawing: PL/007 - HGV Tracking dated August 2012.

3. No construction activities hereby permitted shall commence until a Method of Construction Statement has been submitted to and approved in writing by the County Planning Authority. This Method of Construction Statement shall include details of (a) parking for vehicles of site personnel, operatives and visitors, (b) loading and unloading of plant and materials, and (c) storage of plant and materials. Only the approved details shall be implemented during the construction period.
4. The development hereby permitted shall not be implemented until space has been laid out within the application site in accordance with Drawing: PL/007 - HGV Tracking dated August 2012 and Drawing: B/PL/004 - Proposed Block Plan dated August 2012 for cars and HGV's to be parked, the loading and unloading of cars and HGV's, and for cars and HGV's to turn so that they may enter and leave the application site in forward gear. The parking, turning and loading areas shall be retained exclusively for their designated purposes for the duration of the development.
5. Within 7 days of commencement of the development hereby permitted the car parking, HGV parking, and skip storage areas shown on Drawing: B/PL/004 dated August 2012 shall be clearly delineated on the concrete surface using yellow paint. These delineations shall be maintained for the duration of the development.
6. No waste materials shall be stored in the open except within the designated waste bays or within skips awaiting unloading and export as shown on Drawing: B/PL/004 - Proposed Block Plan dated August 2012 .
7. The height of any material stored within any of the storage bays shown on Drawing: B/PL/004 - Proposed Block Plan dated August 2012 shall not exceed 3 metres.
8. No external plant or machinery shall operate above ground level outside of the building shown on Drawing: B/PL/004 - Proposed Block Plan dated August 2012.
9. No processing activities undertaken in the southeastern corner of the application site shall take place above the height of the 2.5 metre high acoustic barrier as shown on Drawing: B/PL/004 - Proposed Block Plan dated August 2012.
10. The level of noise arising from any operation, plant or machinery on site, when measured at, or recalculated as at, a height of 2.5 metres above ground level and 3.6 metres from the facade of a residential property or other noise sensitive building shall not exceed the following values after correction for the characteristics of the noise as defined in BS 4142 paragraph 8.2 during any 30 minute period:

Chapel Farm Cottage - 48 LAeq

Chapel Farm Mobile Home Park - 44 LAeq

If the noise, properly adjusted for characteristics of noise from other sources exceeds the limit figures above, immediate action should be taken to control the noise emission to comply with the specified limits above. This would entail immediately stopping that plant or machinery identified as the cause of the breach. The use of the identified plant or machinery shall not recommence until corrective action has been undertaken which has been approved in writing by the County Planning Authority. Any such event should be reported within 24 hours to the County Planning Authority in writing giving details of the initial noise assessment, the action taken, and the resultant assessment of the noise exposure for local residents.

11. All waste materials imported to the application site shall be by way of skip vehicle only and all laden vehicles entering and leaving the application site shall, without exception, be sheeted.

12. The emergency access gate shown on Drawing: B/PL/004 - Proposed Block Plan dated August 2012 shall at all times be kept clear so that vehicles can access and egress the site without hindrance or obstruction.
13. Notwithstanding any provision to the contrary under Schedule 2 of the Town and Country Planning (General Permitted Development) Order 1995 or any subsequent Order, no plant, building or machinery whether fixed or moveable other than that specifically outlined by this decision shall be erected on the application site without the prior approval of the County Planning Authority in respect of their siting, design, specification and appearance. Such details to include the predicted levels of noise emission and tonal characteristics of any plant or machinery.
14. The Dust Action Plan detailed in pages 14 to 24 of the 20/20 Recycling Ltd. Penrhyn, Guildford Road - Air Quality Assessment version 2 dated December 2012 shall be implemented upon commencement of the development hereby permitted and shall be maintained for the duration of the development.
15. The dust mitigation measures specified in paragraph 4.9.6 on page 11 of the 2020 Recycling Planning Statement incorporating Design and Access Statement dated September 2012 shall be implemented upon commencement of the development hereby permitted and maintained for the duration of the development.
16. Upon commencement of the development hereby permitted rubber treads shall be installed on all tracked plant and machinery in accordance with paragraph 5.6 on page 11 of 2020 Recycling Facility, Normandy, Surrey Noise Survey of Recycling Activities revision 2 dated March 2012 and maintained for the duration of the development.
17. Upon commencement of the development hereby permitted all reversing beepers associated with 2020 Recycling Ltd. plant, machinery and vehicles shall be replaced with white noise reversing signals. These white noise reversing signals shall be maintained for the duration of the development.
18. The odour mitigation measures detailed in paragraph 4.3 on pages 11 and 12 of the 20/20 Recycling Ltd. Penrhyn, Guildford Road - Air Quality Assessment version 2 dated December 2012 shall be implemented upon commencement of the development hereby permitted and maintained for the duration of the development.
19. Vehicle movements associated with the development hereby permitted shall not exceed 100 per working day. Records of these vehicle movements shall be maintained and made available to the County Planning Authority upon request.
20. No operations or activities permitted or required by the permission hereby granted, or the servicing, repair or maintenance of plant, machinery or vehicles be carried out, and no lights shall be illuminated, except between the following times:

0730 hours to 1800 hours Mondays to Fridays; and
0730 hours to 1300 hours on Saturdays.

No operations or activities including the illumination of lights and the servicing, repair or maintenance of plant, machinery or vehicles shall take place on Sundays, national, bank or public holidays.

Reasons:

1. To comply with Section 91(1)(a) of the Town and Country Planning Act 1990 as amended by Section 51(1) of the Planning and Compulsory Purchase Act 2004.
2. For the avoidance of doubt and in the interests of proper planning.

3. In order that the development should not prejudice highway safety or cause inconvenience to other highway users in accordance with Policy G1(2) of the Guildford Borough Local Plan 2003 and Policy DC3 of the Surrey Waste Plan 2008.
4. To comply with the terms of the application.
5. In order that the development should not prejudice highway safety or cause inconvenience to other highway users in accordance with Policy G1(2) of the Guildford Borough Local Plan 2003 and Policy DC3 of the Surrey Waste Plan 2008.
6. In the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008 and the terms of the application.
7. In the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008 and the terms of the application.
8. In the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008.
9. In the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008.
10. In the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008.
11. In the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008 and to comply with the terms of the application.
12. So as to comply with the terms of the application.
13. To enable the County Planning Authority to exercise control over the development and to minimise its impact on local amenity and the environment in accordance with Policy DC3 of the Surrey Waste Plan 2008.
14. To comply with the terms of the application and in the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008.
15. To comply with the terms of the application and in the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008.
16. To comply with the terms of the application and in the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008 and in the interests of the setting of Chapel Farm Cottage in accordance with Policy DC2 of the Surrey Waste Plan 2008.
17. To comply with the terms of the application and in the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008 and in the interests of the setting of Chapel Farm Cottage in accordance with Policy DC2 of the Surrey Waste Plan 2008.
18. To comply with the terms of the application and in the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008.
19. To comply with the terms of the application and in the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008.

20. In the interests of local amenity in accordance with Policy DC3 of the Surrey Waste Plan 2008.

Informatives:

1. Details of the highway requirements necessary for inclusion in any application seeking approval of reserved matters may be obtained from the Transportation Development Planning Division of Surrey County Council.
2. For the avoidance of doubt in respect of Condition 19, two vehicle movements equates to one vehicle accessing the site and the same vehicle egressing the site. Reference to 'vehicles' includes cars, vans, motorcycles, LGVs and HGVs.
3. Surrey County Council's Planning and Regulatory Committee's view is that the commencement of activities or operations permitted or required by the permission hereby granted includes the starting of vehicles, plant and machinery.
4. For the avoidance of doubt Condition 20 does not prevent the intermittent illumination of existing security lighting.
5. Surrey County Council confirms that in assessing the development hereby permitted it has worked with the applicant in a positive and proactive way in line with the requirements of paragraph 186-187 of the National Planning Policy Framework 2012.

THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2010

Reasons for the grant of planning permission and development plan policies relevant to the decision.

- 1 The development does not accord with Policy SP5, Policy CW6, and Policy RE2 of the South East Plan 2009, Surrey Waste Plan 2008, and Guildford Borough Local Plan 2003 respectively, however the very special circumstances of this proposal clearly outweigh these policy constraints in the development plan and there are no material considerations which indicate otherwise.
- 2 The development would provide the following benefits: continue to divert waste away from landfill, drive waste up the waste hierarchy, and contribute to sustainable waste management in the region;
- 3 Any other harm (noise, air emissions, and vehicle movements) can be adequately mitigated by the measures proposed in the application and the conditions subject to which planning permission is granted.

The proposal has been considered against the following development plan policies/ provisions:

The South East Plan May 2009:

Policy CC1 – Sustainable Development
Policy NRM9 – Air Quality
Policy NRM10 – Noise
Policy W17 – Location of Waste Management Facilities
Policy BE6 – Management of the Historic Environment
Policy W5 – Targets for Diversion from Landfill
Policy W6 – Recycling and Composting
Policy W7 – Waste Management Capacity Requirements
Policy SP5 – Green Belts

Surrey Waste Plan 2008:

Policy CW4 – Waste Management Capacity
Policy CW5 – Location of Waste Facilities
Policy WD2 – Recycling, Storage, Transfer, Materials Recovery and Processing Facilities
Policy DC2 – Planning Designations
Policy DC3 – General Considerations
Policy CW6 – Development in the Green Belt

Guildford Borough Local Plan 2003:

Policy G1(2) – Transport Provision, Access, Highway Layout and Capacity
Policy G1(3) – Protection of Amenities Enjoyed by Occupants of Buildings
Policy HE4 – New Development which Affects the Setting of a Listed Building
Policy RE2 – Development within the Green Belt

CONTACT

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BACKGROUND PAPERS

The deposited application documents and plans, including those amending or clarifying the proposal, responses to consultations and representations received as referred to in the report and included in the application file and the following:

Government Guidance

National Planning Policy Framework
Planning Policy Statement 10 – Sustainable Waste Management

The Development Plan

South East Plan 2009
Surrey Waste Plan 2008
Guildford Borough Local Plan 2003

Other Documents

Waste Strategy 2007
