TO: PLANNING & REGULATORY COMMITTEE
DATE: OCTOBER 2013

BY: PLANNING DEVELOPMENT CONTROL TEAM MANAGER

DISTRICT(S) WAVERLEY BOROUGH COUNCIL
ELECTORAL DIVISION(S): WAVERLEY EASTERN VILLAGES MRS YOUNG

PURPOSE: FOR DECISION

GRID REF: 499153 135398

TITLE: MINERALS AND WASTE APPLICATION WA/2013/1223

SUMMARY REPORT

Chiddingfold Storage Depot, Chiddingfold Road, Dunsfold, Godalming, Surrey GU8 4PB

The importation, deposit, storage and transfer of discarded automotive parts (class B8); importation, deposit, storage and processing of discarded catalytic converters; together with external alterations to the former boiler room, additional vehicle parking spaces and installation of passive infrared lighting.

The development proposed is retrospective in nature as it commenced in November 2012. The County Planning Authority (CPA) was made aware of the proposed use of the land and buildings in late March 2013 following which a site meeting was held with the applicant on 8 April 2013. On 9 April 2013, following discussions between Officers of Borough Planning Authority and the CPA, it was accepted that the proposal comprised a ‘county matter’ for the purposes of the Town and Country Planning Act 1990. Pre-application discussions between the CPA and the applicant commenced shortly thereafter following which a planning application, the subject of this report, was submitted to Surrey County Council for determination on 15 July 2013.

Having regard to the nature and location of the development outside the Green Belt and Surrey Hills Area of Outstanding Natural Beauty, and taking into account the matters discussed in paragraphs 38 to 51 below, Officers consider that the principal issues relating to the proposal are: (a) the waste management considerations and implications of the proposal having regard to the waste hierarchy; (b) whether the proposal could be undertaken without significantly adversely affecting the local highway network such that it would severely inconvenience or endanger other highway users; and (c) whether the proposal could be undertaken without significantly adversely affecting local amenity or the local environment by way of noise, dust, and whether the proposal would be at risk of flooding or increase the risk of flooding elsewhere.

The lawful use of the land and buildings concerned is provided for by planning permission Ref. WA/79/1960 dated 10 January 1980. This permission enables the application site to be used for the storage of fertilisers and animal feed stuffs. Although Condition 1 of planning permission Ref. WA/79/1960 restricts the use of the land and buildings to the storage of fertilisers and animal feed, in effect, Officers consider that this permission allows the land and buildings to be used for Use Class B8 (storage or distribution) purposes.

The development proposed is to be located on previously developed brown field land in Flood Zone 1 (land with the lowest probability of flooding). The application site is situated approximately 1.9km east of Chiddingfold and some 1.7km south-west of Dunsfold. Haslemere lies some 9km to the south-west, Godalming some 8km to the north, and Cranleigh some 8km...
to the north-east. The application site is located between the A283 to the west and the A281 to the east. In total the proposed development would generate up to 684 vehicle movements per month of which 44 (some 15%) would be related to HGVs.

Although access to the application site is only served by an unclassified road, the County Highway Authority (CHA) does not consider that the proposal would have a material impact on highway safety or capacity. Accordingly, the CHA has not objected to the proposal subject to conditions.

The Environment Agency (EA) has been consulted in respect of the proposal for pollution prevention and control purposes. Although the applicant is the holder of a Waste Carriers and Dealers Permit (Registration Ref. CB/NM3945LG), the EA has not objected to the proposal but have advised that the applicant contact them to ascertain whether an Environmental Permit would be necessary to undertaken the development. The applicant has confirmed that no trade effluents are to be disposed of as part of the development, the proposal does not involve the use or storage of any hazardous substances, and that foul sewage is to be disposed of by way of package treatment plant. The proposal does not include the importation, processing or disposal of vehicle brake pads, or the de-pollution of vehicles or parts of vehicles.

The proposed development would entail the recovery of precious metals from some 500 tonnes of discarded catalytic converters per annum. It would also catalogue and transfer tens of thousands of discarded automotive parts for re-use every year. Any automotive parts that cannot be reused following reconditioning, and the empty shells of catalytic converters, would be sent off site for recycling or disposal. In all likelihood, given that these items would be considered scrap metal, they would all be recycled. The development would therefore promote the Waste Hierarchy by advancing waste recovery and reuse over waste disposal in accordance with the Waste Framework Directive and Planning Policy Statement 10 – Planning for Sustainable Waste Management. Although the application site’s contribution to the recovery of Commercial and Industrial waste in Surrey would be relatively small, 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 recovery.

The development does have the potential to adversely impact the local environment and amenity by way of noise and dust as it includes the importation, storage, cataloguing, and transfer of metallic waste materials. However, having assessed the development in conjunction with Surrey County Council’s Environmental Noise and Air Quality Consultant, Officers consider that the development can be made acceptable by the imposition of planning conditions.

The recommendation is to PERMIT planning application Ref. WA/2013/1223 subject to conditions.

APPLICATION DETAILS

Applicant
Refine Metals (UK) Ltd.

Date application valid
18 July 2013

Period for Determination
17 October 2013

Amending Documents
Email dated 20 August 2013 from Colin Kiely
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.

<table>
<thead>
<tr>
<th>Is this aspect of the proposal in accordance with the development plan?</th>
<th>Paragraphs in the report where this has been discussed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waste Management Considerations</td>
<td>Yes</td>
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<tr>
<td>Highway and Traffic Considerations</td>
<td>Yes</td>
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<tr>
<td>Amenity and Local Environment Considerations</td>
<td>Yes</td>
</tr>
</tbody>
</table>

ILLUSTRATIVE MATERIAL

Site Plan

Drawing: 100/3 Block Plan Location Plan Rev. F dated December 2012
Drawing: 100/02 Existing and Proposed Plans Rev. B dated December 2012

Aerial Photographs

Aerial 1
Aerial 2

Site Photographs

Figure 1: Building B entrance
Figure 2: South eastern facade of building B
Figure 3: Sound insulation of building B
Figure 4: Former boiler room
Figure 5: External storage sheds
Figure 6: Building A
Figure 7: Building A interior 1
Figure 8: Building A interior 2
Figure 9: Building A interior 3
Figure 10: Building A interior 4
Figure 11: Ancillary Storage
Figure 12: Access gate between building A and B
Figure 13: 40 Yard Skips

BACKGROUND

Site Description and Planning History

1. The application site, located in the Borough of Waverley and the Parish of Dunsfold, measures some 0.68ha in total and is situated approximately 1.9km east of Chiddingfold and some 1.7km south-west of Dunsfold. It is located on previously developed land
The storage depot comprises two planning units each accessed independently off Chiddingfold Road. Its 220m long north-eastern boundary, of which approximately 115m relates to the application site, runs parallel with Chiddingfold Road and is formed of palisade fencing, security access gates, and mature hedgerows and trees. The remaining perimeter boundaries of the depot abut blocks of woodland. Part of the facades and roof profiles of the existing two buildings within the depot can be seen from Chiddingfold Road and surrounding land. Officers consider that the storage depot is industrial in scale and character.

The principal building (Building A) within the depot has also been split into two separate planning units the larger of which relates to the proposed development. The remainder of this building (the smaller part which extends towards the north-west) continues to be used for data storage and measures some 1,115m².

Building A, for the purposes of the proposal, measures 2,747m² and includes mezzanine flooring of 560m². A small boiler room (some 35.08m²) protrudes from Building A’s south-eastern façade. To the south-east of Building A is a smaller building (Building B) which measures some 220m² and also forms part of the proposal.

The remainder of the application site comprises existing hardstanding and existing external open-sided storage sheds located to the west of Building A and along the application site’s south-western boundary. The application site is accessed off Chiddingfold Road and via security gates between Buildings A and B. This access gate is operated by way of an intercom system.

The lawful use of the land and buildings concerned is provided for by planning permission Ref. WA/79/1960 dated 10 January 1980. This permission enables the application site to be used for the storage of fertilisers and animal feed stuffs. Although Condition 1 of planning permission Ref. WA/79/1960 restricts the use of the land and buildings to the storage of fertilisers and animal feed, in effect, Officers consider that this permission allows the land and buildings to be used for Use Class B8 (storage or distribution) purposes due to its description, “Change of use of existing building of 4,600m² (50,000ft²) to that of the storage of fertilizers and animal feed stuffs at the CEGB storage building, Chiddingfold Road, Dunsfold as amplified by letters dated 25 October 1979 and 9 January 1980.”

The application site is located within an Area of Great Landscape Value (AGLV). It is not situated within the Metropolitan Green Belt, the Surrey Hills of Outstanding Natural Beauty (AONB), or a Conservation Area. The application site does however abut Birchen Copse (Ancient Semi Natural Woodland) which includes the Chiddingfold Forest Site of Special Scientific Interest (SSSI) some 60m from the western boundary of the application site.

English Heritage’s National Heritage List for England does not show any Listed Buildings within close proximity to the application site and no Registered Parks and Gardens, Local or National Nature Reserves, Special Protection Areas (SPA), Sites of Nature Conservation Importance (SNCI), or Special Areas of Conservation (SAC) appear to surround the application site. The application site is located within Flood Zone 1 (land with the lowest probability of flooding).

The landscape surrounding Chiddingfold Storage depot is rural in character predominantly comprising woodland and farmland. However several dwellings are located in close proximity to the application site and a small commercial/industrial estate is located some 700m to the south-west along Chiddingfold Road. Several large agricultural sheds associated with Wetwood Farm are situated about 100m to the north-
east of the application site beyond Wetwood Cottage and Millmead Cottage respectively. Further dwellings are clustered around the junction of Chiddingfold Road, Plaistow Road, Wrotham Hill and Dunsfold Common Road some 1km to the south-west.

10 In addition to Wetwood and Millmead cottages, which are located immediately east of the application site’s north-eastern boundary and beyond Chiddingfold Road, Larchwood and its residential curtilage borders the application site to the south-east beyond a block of woodland. Woodside Cottage (designated by the Borough Council as a building of Local Merit) and a horse riding stable establishment are located some 190m to the north-west of the application site along Chiddingfold Road.

11 The development proposed is retrospective in nature as it commenced in November 2012. The County Planning Authority (CPA) was made aware of the proposed use of the land and buildings in late March 2013 following which a site meeting was held with the applicant on 8 April 2013. On 9 April 2013, following discussions between Officers of Local Planning Authority and the CPA, it was accepted that the proposal comprised a ‘county matter’ for the purposes of the Town and Country Planning Act 1990. Pre-application discussions between the CPA and the applicant commenced shortly thereafter following which a planning application, the subject of this report, was submitted to Surrey County Council for determination on 15 July 2013.

12 In December 2012 planning permission (Ref. WA/2013/0227) was sought from Waverley Borough Council for the change of Use from storage to warehouse with ancillary office for the storage, picking and distribution of automotive parts together with extension and alterations and installation of sewage treatment plant. This application was withdrawn in April 2013 following the site meeting discussed in the preceding paragraph.

13 In August 2013 Advertisement Consent (Ref. WA/2013/1326) was sought from Waverley Borough Council for the display of a non-illuminated sign on the entrance gate to the application site. Consent was granted for the retention of the sign in August 2013.

THE PROPOSAL

14 The applicant has described the proposal as, “The importation, deposit, storage and transfer of discarded automotive parts (Class B8); importation, deposit, storage and processing of discarded catalytic converters; together with external alterations to the former boiler room, additional vehicle parking spaces and installation of passive infrared lighting.”

15 In more detail Officers consider that the development would entail the material change of use of some 0.68ha of existing land and buildings to a sui generis (unique) waste management use involving: (a) the importation, storage, processing (de-canning) and transfer of some 500 tonnes (annually) of discarded catalytic converters so as to extract the precious metals found within them; (b) the importation, storage, cataloguing, and transfer of discarded automotive parts (clutches, turbo chargers, air conditioning units, gear boxes etc.) for disposal or reconditioning off-site; (c) alternations to the former boiler room (insertion of windows, creation of first floor and replacement of roof) so as to use it for ancillary office space; (d) the provision of additional on-site vehicle parking spaces; and (e) installation of motion sensitive infrared security lighting.

16 The applicant is not able to provide an annual throughput (in tonnes) of discarded automotive parts (clutches, turbo chargers, air conditioning units, gear boxes etc.) to be stored, catalogued, and transferred as part of the proposal. However the applicant has confirmed that tens of thousands of these units would pass through the application site annually.

17 Building A is to be used to store and catalogue discarded automotive parts including catalytic converters before these are processed within Building B. Processing (de-
canning by way of a hydraulic shear) of discarded catalytic converters is to take place within Building B. The loading and unloading of discarded automotive parts into and out of vehicles is to take place in the open between Buildings A and B, and additional external storage of discarded automotive parts is to take place within the external open sided storage sheds.

18 Two 40-yard container-skips are to be stored along the western facade of Building B (for processed catalytic converters to be recycled off-site), a single 20 yard skip is to be sited on the western boundary of the application site (for automotive parts to be disposed of off-site), whilst a single 6m³ skip (for general waste) is to be sited on the eastern boundary of the application site adjacent to 10 proposed car parking spaces located south of Building B.

19 Further vehicle parking (12 spaces) is proposed to take place within the south-western corner of the application site. According to the applicant the storage depot provided for 14 parking spaces whereas the proposal includes provision for 22 spaces (a 57% increase).

20 Eight Passive Infrared Lights (PIR) are proposed to be installed on the existing buildings: two above the doors of Building A (south-eastern facade); two on the former boiler room (south-eastern facade and north-eastern facade); and four on Building B (north-western facade, south-western facade, and two along its south-eastern facade). These motion sensitive lights would only be operational during the hours of darkness and then only for security purposes.

21 Discarded catalytic converters would be delivered to the application site up to four occasions per week (up to 32 vehicle movements per month) by way of a 7.5 tonne HGV. Following recovery of the precious metals, the de-canned catalytic converters would be deposited into rubber-lined mini skips and then transferred into two 40-yard container-skips. These container-skips would in turn be collected every two to three weeks (up to 8 vehicle movements per month). In addition, articulated HGVs would visit the application site up to two occasions per month from the continent to collect catalogued automotive parts (up to 4 vehicle movements per month). The applicant's employees would account for up to 28 vehicle movements per day (up to 560 vehicle movements per month). In total the proposed development would generate up to 684 vehicle movements per month of which 44 (some 15%) would be related to HGVs. *These calculations assume a four-week month and a five-day week.

22 The proposed development is to be operational from 0800 to 1800 hours Mondays to Fridays and 0800 to 1300 hours on Saturdays. No working is proposed to take place on Sundays or Bank, National or Public holidays.

23 The proposal does not include the erection or construction of any new buildings, structures, or lighting columns. The proposal does not include the extension of the existing site area beyond its lawful land-use parameters.

CONSULTATIONS AND PUBLICITY

Consultees (Statutory and Non-Statutory)

24 Waverley Borough Council - No views received as yet
25 The Environment Agency - No objection
26 County Highway Authority - No objection subject to conditions
27 Surrey County Council - No objection subject to conditions
Environmental Noise Consultant

28 Surrey County Council Air Quality Consultant - No objection

29 Thames Water - No objection

Parish/Town Council and Amenity Groups

30 Dunsfold Parish Council - Object

Summary of publicity undertaken and key issues raised by public

31 The application was publicised by the posting of a single site notice at the entrance to the application site and an advert was placed in the Farnham Herald on 9 August 2013. Moreover, the County Planning Authority (CPA) notified a total of 7 owner/occupiers of neighbouring properties of the proposal by letter.

32 The CPA has received 7 letters of representation raising objection to the proposal. A summary of the concerns raised by objectors is given below. In addition, some local residents have provided Officers with photographs taken of the application site, surrounding land, and vehicles accessing and departing the depot. Further, Officers have met with some local residents at their dwellings to discuss their respective concerns in relation to the proposal:

- The proposal is better suited to an industrial area
- The site sits in an agricultural area
- Wetwood Cottage is a smallholding and various fields along Chiddingfold Road are used for grazing
- The applicant has installed metal gates and fencing which looks unsightly in a rural area.
- This is an area of special advertisement control
- It would be entirely inappropriate for permission to be granted for the type of industrial activity envisaged
- The development would have a very materially negative impact on the tranquil, rural local environment
- The application site was neither previously developed nor redundant
- The area in which the site exists is residential and rural
- The operations proposed are an inappropriate activity
- An area of great landscape value in countryside beyond the green belt provides greater protection of industrialisation than just being in green belt
- Very little activity occurred when the depot was used as a document store
- The application is against national and local policy, it is incomplete, inadequate and has been supported by a discredited environmental assessment
- The loud noises from the site destroy local tranquillity
- The activity creates a noise nuisance
- Vibrations from the development cause windows to rattle
- The applicant’s noise assessment does not comply with BS 4142 and therefore no reliance can be placed on it
- The applicant’s noise assessment reads very much in their favour as you would expect
- Many of the assertions made in the applicant’s design and access statement must be flawed
- It would be preferable if the recycling and processing operations was dealt with in modern, purpose designed buildings and in urban locations
- Many thousands of catalytic converters would need to be processed to ensure a profitable business
• There are highway and noise issues which are sufficient to render this development unsuitable for this application given the close proximity of Larchwood and the neighbouring properties
• Articulated lorries have to reverse in and out of the site because there is insufficient turning space at the site
• The additional traffic to and from the site would create further potholes and diesel spills
• Access from either end of Chiddingfold Road involves navigating sharp bends
• The location is not suitable for articulated lorries despite the applicant’s assertions
• Drivers of vehicles wishing to gain entrance to the site blow their horns
• Articulated lorries arriving at the site completely block the road in order to back into the site
• If discarded automotive parts are classes as waste they should not be stored in a class B8 building
• The application site is not an allocated site in the Surrey Waste Plan 2008
• A profitable business would lead to a dramatic increase in travel levels with vans and lorries delivering the converters and removing precious metals, longer working hours and more traffic in and out of the site
• The development has had a debilitating effect on our health and on the welfare of our animals
• My daughter, who has a long-term illness, is acutely affected by noise
• Birchen Copse contains special mosses and lichens which have been granted SSSI, and contain streams which eventually feed into the river Arun
• There is an area of special scientific interest in the ancient woodland adjoining the site
• The lights to be installed will cause light pollution in a rural area
• Air pollution from the regular bonfires at the store will affect local flora and fauna and human health
• Trees have already been felled by the applicant
• Concern about asbestos on site
• Concerned about water borne and air borne contamination as a result of all the activity in the open yard at the store
• Contamination of Birchen Copse could have a devastating effect on fauna and trees
• The applicant has been occupying the premises for almost a year without the benefit of planning permission for the change of use
• There is no economic case for locating the business at the depot as the location imposes significant external costs on the community while giving slight local benefit

THE DEVELOPMENT PLAN

33 Surrey County Council, as the County Planning Authority (CPA), has a duty under Section 38 (6) of the Planning and Compulsory Purchase Act 2004 to determine this application in accordance with the Development Plan unless material considerations indicate otherwise.

34 Section 70(2) of the Town and Country Planning Act 1990 (the 1990 Act) requires the CPA, in determining planning applications, to have regard to (a) the provisions of the Development Plan, so far as material to the application, (b) any local finance considerations, so far as material to the application, and (c) any other material considerations. At present in relation to this application the Development Plan comprises the Surrey Waste Plan 2008 and the saved policies of the Waverley Borough Local Plan 2002.

35 The National Planning Policy Framework (the Framework) was adopted in March 2012. This document provides national guidance to local planning authorities in making decisions in respect of planning applications. 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 guidance 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.

36 The Development Plan remains the cornerstone of the planning system. Planning applications which comply with an up to date Development Plan should be approved whilst refusal should only be on the basis of conflict with the Development Plan and other material considerations.

37 The Framework states that policies in local plans should not be considered out of date simply because they were adopted prior to publication of the Framework. However, the policies in the Framework are material considerations which planning authorities should take into account. Due weight should be given to relevant policies in existing plans according to their degree of consistency with the Framework - the closer the policies are to the policies in the Framework, the greater the weight they may be given.

PLANNING CONSIDERATIONS

Validity of Planning Application Ref. WA/2013/1223

38 Dunsfold Parish Council and some local residents have raised concern with regards to the validity of the planning application associated with the proposal as they believe that Refine Metals (UK) Ltd. operate the application site in conjunction with Autoparts (UK) Ltd and other organisations. The Parish Council asserts that the planning application is invalid because the declared applicant (Refine Metals (UK) Ltd.) only carries out part of the development proposed. The Parish Council has stated that, “Permission cannot be granted to Refine for an activity that it does not carry out or control, and which the CPA will not be able to control either.” Further, the Parish Council and some local residents also consider the application to be invalid as they disagree with some of the information the applicant has detailed on the planning application form.

39 Any planning permission granted in respect of the proposal would be associated with the land and buildings concerned. It would not be specific to any organisation or individual and could be transferred freely from one landowner to another without consultation with Surrey County Council or Waverley Borough Council. The planning permission sought is for a permanent material change of use of the land and buildings. Any planning permission granted on these terms would supersede the existing lawful use of the land and buildings (Ref. WA/79/1960). Any conditions imposed on any planning permission granted in respect of the proposal could be properly enforced by Surrey County Council despite whether the applicant undertakes only part of the development. The landowner of the application site, and their successors in title, would be responsible for any breaches of planning control associated with any planning permission granted. According to contemporary Land Registry records the applicant is the landowner of the application site. Accordingly, Officers do not consider that the relationship between the applicant (Refine Metals (UK) Ltd.) and any other organisation is material to the determination of the proposed development.

40 Officers do not consider that the planning application associated with the proposal can be considered invalid due to the Parish Council not agreeing with some of the information detailed on the application form. Officers have however noted the concerns raised in this respect and have sought to address these throughout the relevant sections of this report.

Retrospective Nature of the Proposal
Decisions relating to planning applications are limited by law to ‘material planning considerations’. Any issues which are not considered material will be set aside by Officers in making their recommendation to Surrey County Council’s Planning and Regulatory Committee. By way of example the following matters are not considered material planning considerations: boundary disputes, covenants or other property rights issues; effect on local property values; the applicant’s conduct, private affairs, or other civil matters; and the future development intentions of the applicant.

The Parish Council and some local residents have raised concern with regards to the retrospective nature of the proposal. Whilst Officers acknowledge that undertaking development without first obtaining planning permission is not recommended, it is not an offence to do so. Government advice is that the fact that a development has already taken place should make no difference to the CPA’s considerations of its merits. For this reason Officers do not consider that the retrospective nature of the proposal is material to the determination of the planning application.

Landscape and Visual Amenity Considerations

Saved policy C3 of the Waverley Borough Local Plan 2002 advocates that the Council will protect and conserve the distinctiveness of the landscape character areas within the Borough. It goes on to state that management and enhancement of landscape features to conserve landscape character and retain diversity will be promoted, and that development appropriate to the countryside will be expected to respect or enhance existing landscape character by appropriate design. This policy stresses that Areas of Great Landscape Value make a valuable contribution to the quality of Waverley’s countryside and the setting of the towns and as such strong protection will be given to ensure the conservation and enhancement of the landscape character. Although located in an Area of Great Landscape Value (AGLV) the proposal does not include the erection or construction any new structures or expansion of the existing storage depot beyond its lawful land-use boundaries. Officers consider that the application site, which is considered to be industrial in scale and character, is well defined and established within the local landscape. Further, Officers consider that the application site is well screened from external views due to the established and mature hedgerows, trees, and woodland which surround the application site. Part of Building A and B’s facades and roof profiles can be seen from adjacent land and the existing palisade fencing and security access gate can be seen from Chiddingfold Road, however this was the case before the development proposed commenced. Planning consent has recently been granted by Waverley Borough Council for the retention of a non-illuminated sign on the entrance gate to the application site. The minor alterations proposed to the former boiler room, and the addition of mezzanine flooring within Building A are all contained within the existing depot. These alterations are considered proportionate to the scale and character of the existing land and buildings. Changing the colour of an existing building facade, existing gate, or an existing fence is not ‘development’ for the purposes of the Town and Country Planning Act 1990. For these reasons Officers do not consider that the development has had an impact on the local landscape character.

The Passive Infrared Lighting (PIR) to be installed would, by its very nature, be intermittent and limited to the hours of darkness. The PIR lights are motion sensitive and would only operate for security reasons. The lights are angled towards the ground surface and then in towards the application site. The proposal does not include the erection or operation of any new lighting columns. There are no public rights of way in the vicinity of the depot. The application site is not located within the Surrey Hills Area of Outstanding Natural Beauty (AONB). Officers do therefore consider that the proposed security lights would impact the local landscape or have an adverse effect on local amenity.

In April 2013 some local residents complained that the applicant had installed new perimeter palisade fencing along the boundary of the depot adjacent to Chiddingfold
Following investigation of the complaint Officers established that the applicant had replaced old palisade perimeter fencing on a like for like basis (albeit that the new fencing was not painted green). Part 2 Class A of the Town and Country (General Permitted Development) Order 1995 allows for the replacement of fencing if it does not exceed the height of the original fencing. Accordingly, Officers took no further action in respect of this complaint.

Some residents have also reported that trees have been removed from the application site. Having questioned the applicant and discussed this specific matter with residents further, Officers understand that some trees and saplings have been removed from land adjacent to the application site.

Accordingly, for the reasons discussed in the preceding paragraphs Officers do not consider that the visual amenity or the local landscape implications of the development are pertinent to the determination of the proposal.

Pollution Prevention and Control

Some objectors have raised concerns with regards to development’s potential to emit odour and attract vermin. Concerns have also been raised in respect of the possible use of hazardous substances on the application site and the effects that this may have on public health and the local environment. Objectors have cited the use of white suits and breathing apparatus by site operatives, and referred to clouds of red dust emanating from the application site. Officers are aware that the Environment Agency (EA) has been contacted by local residents in this respect.

In explaining the separate but complementary relationship between the land-use planning (CPA) and pollution control regimes (EA) Planning Policy Statement 10 – Planning for Sustainable Waste Management (PPS10) clarifies that, “...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” (paragraph 27).

Paragraph 32 of PPS10 provides further clarification by stating that, “It should not be necessary to use planning conditions to control the pollution aspects of a waste management facility where the facility requires a permit from the pollution control authority. In some cases, however, it may be appropriate to use planning conditions to control other aspects of the development. For example, planning conditions could be used in respect of transport modes, the hours of operation where these may have an impact on neighbouring land use, landscaping, plant and buildings, the timescale of the operations, and impacts such as noise, vibrations, odour, and dust from certain phases of the development such as demolition and construction.”

The EA’s objectives are not designed to be the same as those applied for land-use planning and protection against loss of public amenity. The EA has been consulted in respect of the proposal for pollution prevention and control purposes. Although the applicant is the holder of a Waste Carriers and Dealers Permit (Registration Ref. CB/NM3945LG), the EA has advised that the applicant contact them to ascertain whether an Environmental Permit would be necessary to undertaken the development. The applicant has confirmed that no trade effluents are to be disposed of as part of the development, the proposal does not involve the use or storage of any hazardous substances, and that foul sewage is to be disposed of by way of package treatment plant. The proposal does not include the importation, processing or disposal of vehicle brake pads, or the de-pollution of vehicles or parts of vehicles. Moreover, the
development is concerned with non-putrescible waste material and therefore Officers consider it unlikely that it would attract vermin or emit odour to any greater degree than any other commercial business. The applicant has explained that site operatives are required to wear overalls and protective breathing apparatus when processing catalytic converters inside Building B as a result of the dust generated as part of this specific operation. Accordingly, Officers have not considered matters relating to the Environment Agency’s legislative remit, odour, or vermin as part of this report.

Principal Issues

52 Having regard to the nature and location of the development, and taking into account the matters discussed in the preceding paragraphs, Officers consider that the principal issues relating to the proposal are: (a) the waste management considerations and implications of the proposal having regard to the waste hierarchy; (b) whether the proposal could be undertaken without significantly adversely affecting the local highway network such that it would severely inconvenience or endanger other highway users; and (c) whether the proposal could be undertaken without significantly adversely affecting local amenity or the local environment by way of noise, dust, and whether the proposal would be at risk of flooding or increase the risk of flooding elsewhere.

WASTE MANAGEMENT CONSIDERATIONS

National Guidance
National Planning Policy Framework Paragraphs 1 – 17 Presumption in Favour of Sustainable Development
National Planning Policy Framework Paragraphs 18 – 22 Building a Strong, Competitive Economy
National Planning Policy Framework Paragraph 28 – Supporting a Prosperous Rural Economy
National Planning Policy Framework Paragraphs 79 – 92 Protecting Green Belt Land
Planning Policy Statement 10 – Planning for Sustainable Waste Management

Development Plan Policy
Surrey Waste Plan 2008
Policy CW5 – Location of Waste Facilities
Policy CW4 – Waste Management Capacity
Policy WD2 – Recycling, Storage, Transfer, Materials Recovery and Processing Facilities (Excluding Thermal Treatment)

Waverley Borough Local Plan 2002 (saved policies)
Policy C2 – Countryside beyond the Green Belt
Policy RD7 – Reuse and Adaptation of Buildings in Rural Areas

The European Context

53 The principal piece of European legislation relevant to the proposal is the Waste Framework Directive 2008 (WFD). A key principle of this Directive is the Waste Hierarchy, which requires the prevention of the generation of waste and reduction in its harmfulness. Where this is not possible, waste material should be reused, recycled or recovered. As a final resort, waste should be disposed of safely.

54 For land-use planning purposes the term ‘waste’ is defined in Section 336 of the 1990 Act as, “...anything that is waste within the meaning of Article 3(1) of the 2008 Waste Framework Directive” (Directive 2008/98/EC). Directive 2008/98/EC defines ‘waste’ as, “...any substance or object which the holder discards or intends or is required to discard...” The automotive parts associated with the proposal have been discarded at their point of origin i.e. the MOT testing centers and/or vehicle repair workshops where the parts have been removed from vehicles. At this point they are deemed to be waste for the purposes of land-use planning.
55 The guidance document associated with the WFD explains that disposal operations primarily result from waste management operations based on getting rid of waste, whereas the principal result of a recovery operation is “waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy” (Section 1.4.5 of ‘Guidance on the interpretation of key provisions of Directive 2008/98/EC on waste’, European Commission Directorate-General Environment, June 2012).

56 Dunsfold Parish Council and some objectors have referred to the proposal as a ‘waste disposal operation’. However Officers, having regard to the WFD, consider that the proposed development comprises a waste management operation involving the recovery of waste materials by processing and transfer. It is inevitable that some of the discarded automotive parts associated with the proposal will not be able to be reconditioned for re-use off-site. Accordingly, it is only these automotive parts which are sent for recycling or disposal off-site. Moreover, following recovery of the precious metals found within the catalytic converters, the empty metal shells are sent for recycling off-site. Apart from the disposal of packaging waste by way of burning (which is addressed in paragraph 126 below), Officers do not consider that any disposal operations take place as part of the development.

The Surrey Context

57 The Surrey Waste Plan 2008 (SWP) reports that Surrey is one of England’s smallest counties at around 650 square miles, but has one of the largest populations of over 1,000,000. It is the most urbanized shire county in England with about 85% of people living in urban areas. It has a highly developed economy, with significant job growth and very high average income levels (paragraph 1.1).

58 Accordingly, in 2008 the Environment Agency identified that around 1 million tonnes of Commercial and Industrial waste was generated in Surrey. A majority of this waste was reused, recycled or otherwise recovered, with just under half disposed of to landfill (paragraph 1.2.1 of the SWP). Not all waste generated within Surrey is managed within the County. Nor does all the waste managed in Surrey have its origins in the County. A proportion of Surrey’s waste is exported out of the County, mostly to landfill. In addition, Surrey has, for many years, been landfilling a portion of London’s waste due to its proximity to the Capital and its relative availability of void space (paragraph A5 of the SWP).

59 The increased emphasis on waste minimization, reuse, recycling, and recovery is intended to reduce the amount of waste to be disposed of to landfill. The Environment Agency identified that a 40% drop in Commercial and Industrial Waste going to landfill in Surrey over the period 1998/1999 to 2002/2003 (paragraph A7 of the SWP). Nevertheless, landfill will continue to play a part in waste management for the foreseeable future, but increasingly, the waste going to landfill will have been subjected to pre-treatment. The now defunct South East Plan 2009 estimated that the total waste production in the South East of England would grow from 34.5 million tonnes per annum to nearly 35 million tonnes per annum by 2025. Commercial and Industrial Waste arising grow at around 2% per year (paragraph A8 of the SWP).

60 However, Surrey County Council’s latest Monitoring Report (2011-2012) at paragraph 4.16 reports a slowing growth rate (1.14%) for Commercial and Industrial waste arisings in Surrey between 2010 and 2011. This report concludes that Commercial and Industrial waste arisings in Surrey in 2011 was estimated to be some 859,000 tonnes with some 68% being reused, recycled or otherwise recovered.

Planning Guidance and Policy Context

61 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 Development Plan should be approved without delay, and proposed development that conflicts should be refused unless material considerations indicate otherwise (paragraph 12). Further, the Framework advocates that planning decisions must reflect, and where appropriate promote, relevant European Union obligations and statutory requirements (paragraph 2).

62 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 taking decisions on waste applications should have regard to policies in the Framework so far as relevant (paragraph 5).

63 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 (paragraphs 8 and 9).

64 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).

65 Within the overarching roles that the planning system plays, a set of twelve core land-use planning principles should underpin decision-taking. Four 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, and (d) contribute to conserving and enhancing the natural environment and reducing pollution (paragraph 17).

66 Paragraphs 18 - 22 of the Framework confirms the Government’s commitment 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. They state that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth and that Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.

67 The Framework advocates that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. So as to promote a strong rural economy, local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings; and promote the development and diversification of agricultural and other land-based rural businesses (paragraph 28).

68 Paragraphs 89 and 90 of the Framework discuss what types of developments are ‘appropriate’ in Green Belt locations. Waste-related development is not included in
paragraphs 89 and 90 and therefore, as with previous Green Belt Policy (Planning Policy Guidance 2 – Green Belts), waste-related development is ‘inappropriate development’ in the Green Belt. Officers therefore infer from this guidance that waste-related development outside the Green Belt is ‘appropriate’. This type of development cannot be ‘inappropriate’ both inside and outside of the Green Belt.

69 Government guidance on sustainable waste management is set out in Planning Policy Statement 10 – Sustainable Waste Management (PPS10), which should be read alongside the Framework. PPS10 is material to determination of the proposal.

70 The overall objective of PPS10 is to protect human health and the environment and to encourage more sustainable waste management by moving waste up the waste hierarchy including provisions for recycling and the reuse of previously developed land (paragraph 1).

71 PPS10 acknowledges that some waste management proposals that come forward may not be identified within a Development Plan and as such advises that unallocated sites should be considered favourably when consistent with the policies of PPS10 including locational criteria set out in Annex E of PPS10 and the Surrey Waste Plan 2008 (SWP) (paragraph 24).

72 The SWP 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 their locations. 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 SWP 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 are permitted. The supporting text to Policy CW4 states that Surrey has a surplus landfill void up to 2015, and that the SWP seeks to divert waste from landfill and enable the improved husbandry of existing void (paragraph B34). Paragraph B35 of the SWP explains that Policy CW4 is not prescriptive about facility capacity or technology in order to maintain flexibility and enable the industry to bring forward appropriate development proposals.

74 Paragraph B12 of the SWP confirms that waste management facilities should be suited to development on industrial sites and in urban areas. However, Surrey has relatively limited industrial and urban land, for which there are strongly competing demands. In preparing the SWP, the lack of opportunities within the urban areas of Surrey was confirmed. Accordingly, opportunities for waste management facilities in urban areas are limited, so land beyond needs to be considered. The sustainability appraisal associated with the preparation of the SWP identified the disadvantages of developing green field sites and land designated as Green Belt in terms of protection and enhancement of landscape and open spaces. As such, beyond urban areas, priority is given to the reuse of, or development at previously developed land before green field and Green Belt sites (paragraph B13 of the SWP).

75 Paragraph B42 of the SWP confirms that whilst the Surrey Structure Plan remained part of the Development Plan, Areas of Great Landscape Value (a local designation) should be avoided for waste management development. The Surrey Structure Plan no longer forms part of the Development Plan. Moreover, the term ‘land beyond the Green Belt’ is not recognised by the SWP or the National Planning Policy Framework.

76 Policy CW5 of the SWP 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 green field 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 Great Landscape Value should be avoided (as referred to in the preceding paragraph), 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.

77 Policy WD2 of the SWP states that planning permissions for development involving the storage, transfer, materials recovery and processing of waste will be granted 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.

78 Policy C2 of the Waverley Borough Local Plan 2002 (WBLP) states that in the countryside beyond the Green Belt the countryside will be protected for its own sake. Building in the open countryside away from existing settlements will be protected for its own sake. The supporting text to this policy, at paragraph 3.19, explains that development beyond the Green Belt may be acceptable providing it relates to (a) facilities for waste management and recycling; and (b) the reuse of rural buildings in accordance with Policy RD7 of the WBLP, provided that the proposal is appropriate in layout, scale, height, materials, form, impact and siting and should not adversely affect the landscape, wildlife, ecological, environmental, archaeological and historic resources.

79 Policy RD7 of the WBLP states that the reuse and adaptation of all buildings in rural areas will be permitted where: (a) the building is capable of retention/reuse without substantial construction or enlargement and the proposed use would not detract from the appearance or character of the existing building; (b) the building to be retained is in keeping with its surroundings and does not detract from the character or appearance of the area by reason of its form, bulk, or general design; (c) the proposed development will not introduce an activity which will adversely affect the character or amenities of the area; (d) the proposed development will not be materially detrimental to the amenities or privacy of nearby properties; (e) the introduction of a new commercial use would not be on such a scale as to prejudice the vitality of a nearby town or village; (f) the amount of traffic to be generated would not prejudice highway safety or cause significant harm to the environmental character of country roads; and (g) satisfactory vehicular access can be achieved.

The Development

80 The development proposed is to be located on previously developed brown field land which has an existing lawful use for storage and distribution purposes (Use Class B8). It is situated approximately 1.9km east of Chiddingfold and some 1.7km south-west of Dunsfold. Haslemere lies some 9km to the south-west, Godalming some 8km to the north, and Cranleigh some 8km to the north-east. Paragraph 1.16 of the Waverley Borough Local Plan 2002 identifies Haslemere, Godalming, and Cranleigh as three of the four main urban centres of the borough with Farnham being the fourth.

81 Officers consider that the application site is capable of reuse without substantial construction and that the proposed use would not detract from the appearance or character of the existing buildings. Moreover, Officers consider that the scale and character of the application site is industrial. The development is not concerned with the building of new structures or buildings. Officers have set out why they do not consider that the proposal would impact on the local landscape or local visual amenity in paragraphs 43 to 47 above.

82 The application site is not situated within the Surrey Hills Area of Outstanding Natural Beauty (AONB) nor is it located on or close to any sites with international and/or national nature conservation designations. Although located in an Area of Great Landscape Value, this local designation is afforded less weight, by virtue of the Surrey Structure Plan no longer forming part of the Development Plan, in assessing the suitability of unallocated waste management facilities in terms of location.
83 The application site is located between the A283 to the west and the A281 to the east. Although access to the application site is only served by an unclassified road, the County Highway Authority (CHA) does not consider that the proposal would have a material impact on highway safety or capacity. Accordingly, the CHA has not objected to the proposal subject to conditions.

84 The proposed development would entail the recovery of precious metals from some 500 tonnes of discarded catalytic converters per annum. It would also catalogue and transfer tens of thousands of discarded automotive parts for re-use every year. Any automotive parts that cannot be reused following reconditioning, and the empty shells of catalytic converters, would be sent off site for recycling or disposal. It all likelihood, given that these items would be considered scrap metal, they would all be recycled. The development would therefore promote the Waste Hierarchy by advancing waste recovery and reuse over waste disposal in accordance with the Waste Framework Directive and Planning Policy Statement 10 – Planning for Sustainable Waste Management.

85 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. It goes on to stress 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 in Surrey. This urgency is compounded by the long lead-in time for the development of facilities (paragraph 1.6 of the Surrey Waste Plan 2008).

86 Although the application site’s contribution to the recovery of Commercial and Industrial waste in Surrey would be relatively small, 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 recovery. Accordingly, Officers consider that the proposal is congruent with the guidance contained in the National Planning Policy Framework and Planning Policy Statement 10 – Planning for Sustainable Waste Management in terms of its contribution to sustainable waste management within Surrey, the South East of England and the United Kingdom as a whole.

87 Considering the location of the proposal outside the Green Belt there is no legislative or policy requirement for the applicant to demonstrate that there other suitable sites available which could accommodate the development, nor is it a requisite for the applicant to demonstrate that the location of the development is commercially viable.

Waste Management Considerations Conclusion

88 Having regard to paragraphs 53 to 87 above, Officers consider that the proposal satisfies policies CW4, CW5 and WD2 of the Surrey Waste Plan 2008, and policies C2 and RD7 of the Waverley Borough Local Plan 2002 subject to environment and amenity considerations.

HIGHWAY AND TRAFFIC CONSIDERATIONS

National Guidance
National Planning Policy Framework Paragraphs 29 – 41 Promoting Sustainable Transport
Development Plan Policy
Surrey Waste Plan 2008
Policy DC3 – General Considerations
Waverley Borough Local Plan 2002
Policy M1 – Location of Development
Policy M2 – Movement Implications of Development
Planning Guidance and Policy Context

89 The National Planning Policy Framework (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 29).

90 Paragraph 30 of the Framework encourages solutions which support reductions in greenhouse gas emissions and congestion, whilst paragraph 32 requires that all developments which generate significant amounts of movement should be supported by a Transport Assessment taking account of whether safe and suitable access to the site can be achieved for all people. This paragraph goes on to make clear that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

91 Policy DC3 of the SWP states that planning permissions for waste related development will be granted provided it can be demonstrated by the provision of appropriate information to support a planning application that any impacts of the development can be controlled to achieve levels that will not significantly adversely affect people, land, infrastructure and resources. In this particular case the information supporting the proposal must include assessment of the transport implications of the development and how it is to affect the local highway network.

92 Policy M1 of the WBLP states that the Council will seek to ensure that development is located so as to reduce the need to travel, especially by private car, and to encourage a higher proportion of travel by walking, cycling and public transport. In particular, the Council will seek to: (a) locate major trip generating developments in locations in Farnham, Godalming, Haslemere and Cranleigh which are highly accessible by public transport, cycling and walking; and (b) resist major trip generating developments in peripheral or rural locations where access would be predominantly by private car and where accessibility by other modes is poor.

93 Policy M2 of the WBLP requires that all development proposals should provide safe access for pedestrians and road users, including cyclists, designed to a standard appropriate for the highway network in the vicinity and the level of traffic likely to be generated by the development.

94 Policy M13 of the WBLP states that the Council will seek to minimise the adverse impact of lorry traffic within the Borough. In particular the Council will seek to locate development which are likely to generate heavy goods vehicle movements where the highway infrastructure is capable of accommodating those movements.

95 Policy M14 of the WBLP states that the level of car parking provision appropriate for individual development proposals will be required to make appropriate provision for motor vehicle parking space, having regard to the developer’s own requirements, subject to road safety and traffic management implications, and the accessibility of the location to means of travel other than the private car assessed according to the location and type of development.

The Development

96 The proposed development is to be located on previously developed brown field land and within existing buildings. There are no public transport links to the application site. Although the development is to be accessed via an unclassified road, the application site is located between the A283 to the west and the A281 to the east, which in turn connect to the wider strategic road network. The proposal includes provision for 22 vehicle parking spaces within the application site, a 57% increase on the existing parking arrangement.
According to the applicant discarded catalytic converters would be delivered to the application site up to four occasions per week (up to 32 vehicle movements per month) by way of a 7.5 tonne HGV. Following recovery of the precious metals, the de-canned catalytic converters would be deposited into rubber lined skips and then transferred into two 40 yard container-skips. These container-skips would in turn be collected every two to three weeks (up to 8 vehicle movements per month). In addition, articulated HGVs would visit the application site up to two occasions per month from the continent to collect catalogued automotive parts (up to 4 vehicle movements per month). The applicant’s employees would account for up to 28 vehicle movements per day (up to 560 vehicle movements per month), and two of the applicant’s delivery vans would leave the application site during the day and return again in the afternoon (up to 80 vehicle movements per month). In total the proposed development would generate up to 684 vehicle movements per month of which 44 (some 15%) would be related to HGVs. *These calculations assume a four-week month and a five-day week.

The County Highway Authority (CHA) has been consulted in respect of the proposal. In considering their response to the County Planning Authority (CPA) the CHA has assessed Dunsfold Parish Council’s objection and the photographic evidence provided by some local residents of the vehicle movements and access arrangements associated with the proposal. The CHA have responded as follows, “It is clear from this information that there are occasions when delivery vehicles associated with the site have to park within the carriageway waiting for another delivery vehicle to leave so that they can enter the site. I also note that the large HGVs, particularly articulated lorries, have to turn within the carriageway in order to manoeuvre in/out of the site entrance. Whilst this is not ideal, the existence of a B8 storage facility in this location is a matter of fact, and I do not consider that the proposed use for the site would exacerbate the situation, compared to what can lawfully take place on the site. In this regard, I do not consider that the proposal would have a material impact on highway safety or capacity. I do however consider that the layout of the parking/turning area within the site and the management/scheduling of delivery vehicles visiting the site could be improved, thereby reducing the likelihood of vehicles associated with the site causing disruption to the free and safe flow of traffic on Chiddingfold Road.”

Accordingly, the CHA has not objected to the proposal subject to two conditions requiring submission of a Delivery Management Plan (specifications of delivery vehicles and times deliveries would take place, routing of delivery vehicles, details of the maximum number of delivery vehicles that can be safely accommodated within the site at any one time, and measures to minimise delivery vehicles parked on Chiddingfold Road); and details of formal parking spaces for cars and HGVs, loading and unloading space for delivery vehicles, a dedicated turning space to enable HGVs to enter and leave the site in forward gear. This information would be required to be submitted to the CPA for approval within 3 months of planning permission being granted.

The Framework is clear that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. The proposal would generate up to 684 vehicle movements per month of which 44 (some 15%) would be related to HGVs. Officers do not consider 44 HGV movements per month to be significant or, having regard to the CHA’s views, that these movements would severely impact upon the local highway network. The application site comprises existing buildings and land which may lawfully be used for B8 storage and distribution purposes. Planning permission Ref. WA/79/1960 does not restrict the lawful use in terms of vehicle movements or the types of vehicles that access the depot. Officers do not consider it a shortcoming of the proposal that there are no public transport links to the application site. This inadequacy would remain if the proposed development were not to take place and the depot were to be used for storage and distribution purposes.

*Highway and Traffic Considerations Conclusion*
101 Having regard to paragraphs 89 to 100 above, Officers consider that the development proposed, subject to conditions, satisfies the requirements of Policy DC3 of the Surrey Waste Plan 2008 and policies M1, M2, M13, and M14 of the Waverley Borough Local Plan 2002 so far as possible.

ENVIRONMENT AND AMENITY CONSIDERATIONS

National Guidance
National Planning Policy Framework Paragraphs 93 – 108 Meeting the challenge of Climate Change and Flooding
National Planning Policy Framework Paragraphs 109 – 125 Conserving and Enhancing the Natural Environment
National Planning Policy Statement 10 – Planning for Sustainable Waste Management

Development Plan Policies
Surrey Waste Plan 2008
Policy DC2 – Planning Designations
Policy DC3 – General Considerations
Waverley Borough Local Plan 2002
Policy D1 – Environmental Implications of Development
Policy D2 – Compatibility of Uses
Policy D3 – Resources
Policy D5 – Nature Conservation

Planning Guidance and Policy Context

102 The National Planning Policy Framework (the Framework) asserts that planning plays a key role in helping shape places to minimise vulnerability and providing resilience to the impacts of climate change. It advocates that this is central to achieving sustainable development. The Framework also provides technical guidance on flood risk which replaces Planning Policy Statement 25 – Development and Flood Risk. Paragraph 100 advocates that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Paragraph 103 states that when determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere.

103 Paragraph 120 of the Framework states that in seeking to prevent unacceptable risks from 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 pollution, should be taken into account.

104 At paragraph 122 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 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.

105 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 from new development. In terms of air quality 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.

106 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 noise 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. PPS10 Annex E also 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.

107 Policy DC2 of the Surrey Waste Plan 2008 (SWP) states that planning permission will not be granted for waste related development where this would endanger, or have a significant adverse impact, on the setting of Areas of Great Landscape Value (AGLV) and Sites of Special Scientific Interest (SSSI). This policy goes on to explain that in assessing each development proposal, due regard will be paid to prevailing national policy and guidance appropriate both to the areas and features of acknowledged importance and the proposed means of dealing with waste, and that this assessment will also take into account whether any significant adverse impact identified could be controlled to acceptable levels.

108 Policy DC3 of the SWP requires that the noise, air quality, visual and landscape, fauna and flora and their respective habitats, and health implications of development be taken into account in determining applications and for applicants to demonstrate that any these 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.

109 Policy D1 of the Waverley Local Plan 2001 (WBLP) states that the Council will have regard to the environmental implications of development and will promote and encourage enhancement of the environment. Development will not be permitted where it would result in material detriment to the environment by virtue of: (a) loss or damage to important environmental assets, such as buildings of historical or architectural interest, local watercourses, important archaeological sites and monuments and areas of conservation, ecological or landscape value; (b) harm to the visual character and distinctiveness of a locality, particularly in respect of the design and scale of the development and its relationship to its surroundings; (c) loss of general amenity, including material loss of natural light and privacy enjoyed by neighbours and disturbance resulting from the emission of noise, light or vibration; (d) levels of traffic which are incompatible with the local highway network or cause significant environmental harm by virtue of noise and disturbance; or (e) potential pollution of air, land or water, including that arising from light pollution and from the storage and use of hazardous substances.

110 This policy goes on to explain that the Council will seek, as part of a development proposal, to resolve or limit environmental impacts. This may include the submission of a flood-risk/run-off assessment to determine the potential flood risk to the development, the likely effects of the development on flood risk to others, whether mitigation is necessary, and if so, whether it is likely to be effective and acceptable.

111 Policy D2 of the WBLP states that the Council will seek to ensure that proposed and existing land uses are compatible. In particular: (a) development which may have a materially detrimental impact on sensitive uses with regard to environmental disturbance or pollution will not be permitted; (b) uses such as housing or schools which are sensitive to disturbance or pollution will not be permitted near existing premises which generate significant disturbance or pollution, or which handle hazardous substances; (c) the Council
will encourage redevelopment of a site with a more appropriate use where an existing permitted or lawful use is causing material detriment to the character and amenities of the area and its loss or relocation is acceptable having regard to other policies of the Development Plan.

112 Policy D3 of the WBLP explains that where a development is acceptable in principle, the Council will encourage environmentally innovative schemes which: (a) conserve energy and water through appropriate location, design, layout, landscaping and materials; and (b) minimise the use of non-renewable resources through the re-use or recycling of previously developed land, buildings and materials.

113 Policy D5 of the WBLP explains that development in both urban and rural areas should take account of nature conservation issues. The Council will: (a) seek to retain within a site any significant features of nature conservation value; (b) not permit development that would materially harm a protected species of animal or plant, or its habitat; and (c) encourage the enhancement of existing areas or features of nature conservation value and the creation and management of new wildlife habitats.

The Development

114 The application site is located in Flood Zone 1 (land with the lowest probability of flooding) and abuts Birchen Copse (Ancient Semi Natural Woodland) which includes the Chiddingfold Forest Site of Special Scientific Interest (SSSI) some 60m from its western boundary. The proposal does not include the erection of any new buildings or structures or extension of the lawful land-use boundaries. The proposal entails the reuse of existing land and buildings. There are no Heritage Assets in close proximity to the development. The applicant has confirmed that no hazardous substances are used or stored, and that no trade effluents would be disposed of, as part of the development. The Environment Agency (EA) has been consulted in respect of the proposal in terms of pollution prevention and control. The EA have not objected to the development.

115 Officers have set out why they do not consider that the proposal would impact on the local landscape or local visual amenity, and why the location of the development is considered to be acceptable in paragraphs 43 to 47 and 53 to 88 above respectively. Officers do not consider that the development, subject to conditions, would impact on the adjacent Ancient Woodland or SSSI for the reasons detailed in the preceding paragraph. Moreover, Officers do not consider that the development would be at risk of flooding or increase flood risk elsewhere for the same reasons.

116 However, the development does have the potential to adversely impact the local environment and amenity by way of noise and dust as it includes the processing (de-canning) of some 500 tonnes (annually) of discarded catalytic converters and the importation, storage, cataloguing, and transfer of discarded automotive parts.

117 Following processing the catalytic converter shells would be deposited in metal bins between the hours of 1600 and 1700 Monday to Friday. Similarly, any automotive parts not fit for reconditioning or reuse would be deposited in metal bins between the hours of 1600 and 1700 Monday to Friday. These waste materials and activities are inherently noisy due to their metallic and mechanical nature.

118 Building A is to be used to store and catalogue automotive parts including catalytic converters before these are processed within Building B. The loading and unloading of waste materials into and out of vehicles is to take place in the open between Buildings A and B, and additional external storage is to take place within the external open sided storage sheds.

119 The inside, including the ceiling, of Building B has been fully insulated through the combination of ply wood and sound insulation material. This so that the noise generated as
a result of processing operations within the building are mitigated. The applicant has confirmed that the door to Building B would be kept closed whilst processing operations are underway and that waste receptacles used within Building B would be lined with rubber. Moreover, two high-grade air extractors have been installed within Building B to recover airborne dust particles originating from catalytic converters.

120 The applicant has stated that for operational and functional reasons the doors to Building A cannot be kept closed whilst automotive parts are catalogued and sorted. It has been explained that fork lifts and pallet trolleys need to enter and leave Building A during the course of the working day without hindrance. The doors to Building A are industrial in scale and mass and therefore cannot be easily opened and closed.

121 The loading and unloading of discarded automotive parts into and out of vehicles is to take place in the open between Buildings A and B, and additional external storage of discarded automotive parts is to take place within the external open sided storage sheds. Ancillary storage of catalogued automotive parts ready for collection takes place within the south-eastern corner of the application site.

122 The applicant has submitted a Noise Impact Assessment in support of the proposal. This assessment, which was undertaken at a time when insulation of Building B had not been fully completed, concluded that, “A comparison of the recorded noise levels show that the environmental noise sources have a higher noise impact at the nearby residential premises compared to the industrial activities inside the depot” and that “…the assessment showed that the predicted realistic noise impact from the industrial activities should result in a positive indication that complaints are unlikely.”

123 The applicant’s Noise Impact Assessment has been heavily criticised by local residents and the Parish Council for various reasons. However, Surrey County Council Environmental Noise Consultant (ENC) has also assessed the development, over the course of some 8 hours, from two neighbouring dwellings following completion insulation works associated with Building B. The ENC has not raised objection to the development subject to a range of conditions.

124 In respect of processing operations to be undertaken within Building B the ENC considers that a combination of the insulation of this building, its door being kept shut whilst processing operations are underway, and rubber lined waste receptacles mitigate the noise generated to an acceptable level. However there are other noisy activities associated with the development including the sorting of waste materials in the open, the loading and unloading of waste bins, the deposit of waste materials into waste bins, the traversing of vehicles and fork lifts over a section of disintegrated concrete hardstanding. Having considered the ENC’s consultation response Officers consider that these other activities could be mitigated and controlled in terms of timing and frequency by way of condition so as to make the development acceptable in terms of local amenity.

125 Surrey County Council’s Air Quality Consultant (AQC) has assessed the proposal in terms of traffic movements generated by the proposal and the processing operations to take place within Building B. The AQC has stated that, “...the number of vehicle movements generated by the proposals are not likely to be significant” and “The key source of dust emissions is the de-canning of the catalytic converters; however, there appears to be no active crushing or grinding of the materials carried out on-site, so the magnitude of dust emission is not likely to be large. The primary mitigation measure to prevent adverse dust effects is containment: as specified, the de-canning process will be undertaken inside Building B, which incorporates airborne dust collectors. Furthermore, the purpose of the operational processes is to maximise the recovery of metals for onward recycling and clearly the applicant will seek the most efficient processes to collect particulate matter to maximise revenues. On that basis, it is highly unlikely that there will be significant dust emissions from Building B and we have no recommendations for further work.”
Local residents have raised concern with regards to the disposal of waste materials on the application site by burning. Officers have witnessed this activity and the applicant has been made aware that the County Planning Authority (CPA) considers this to be unacceptable. Should planning permission be granted for the proposal, the CPA would seek to prohibit the disposal of waste materials by burning by way of condition.

Environment and Amenity Considerations Conclusion

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 local planning authorities should assume that these regimes will operate effectively. The EA has not objected to the proposal and advised the applicant that an Environmental Permit may be required to undertake the development.

Officers consider that the development has the potential to adversely impact the local environment and amenity by way of noise and dust. However, having assessed the development in conjunction with Surrey County Council’s Environmental Noise and Air Quality Consultant, Officers consider that the development could be made acceptable by way of conditions.

Having regard to paragraphs 102 to 128 above, Officers consider, subject to conditions, that the proposal accords with Policies DC2 and DC3 of the Surrey Waste Plan 2008 and Policies D1, D2, D3, and D5 of the Waverley Borough Local Plan 2002.

HUMAN RIGHTS IMPLICATIONS

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.

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

The application site is to be located in a rural area on previously developed land (brown field land) and within existing buildings most recently used for data storage purposes. Whilst it is located in the AGLV it does not lie within the Green Belt or the Surrey Hills Area of Outstanding Natural Beauty. The application site has an existing lawful use for storage and distribution purposes (Use Class B8). It is is situated approximately 1.9km east of Chiddingfold and some 1.7km south-west of Dunsfold. Haslemere lies some 9km to the south-west, Godalming some 8km to the north, and Cranleigh some 8km to the north-east.

Officers consider that the application site is capable of reuse without substantial construction and that the proposed use would not detract from the appearance or character of the existing buildings or the local landscape. Moreover, Officers consider that the scale and character of the application site is industrial within a well defined and screened site. The development is not concerned with the building of new structures or buildings. The proposal therefore accords with the SWP and does not otherwise compromise the protection afforded to the AGLV.

The proposed development would entail the recovery of precious metals from some 500 tonnes of discarded catalytic converters per annum. It would also catalogue and transfer tens of thousands of discarded automotive parts for re-use every year. Any automotive parts that cannot be reused following reconditioning, and the empty shells of catalytic
converters, would be sent off site for recycling. The development would therefore promote the Waste Hierarchy by advancing waste recovery and reuse over waste disposal. In total the proposed development would generate up to 684 vehicle movements per month of which 44 (some 15%) would be related to HGVs.

135 The Surrey Waste Plan 2008 advocates 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. It goes on to stress 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 in Surrey. This urgency is compounded by the long lead-in time for the development of facilities.

136 Although the application site’s contribution to the recovery of Commercial and Industrial waste in Surrey would be relatively small, 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 recovery. Accordingly, Officers consider that the proposal is congruent with the guidance contained in the National Planning Policy Framework and Planning Policy Statement 10 – Planning for Sustainable Waste Management in terms of its contribution to sustainable waste management within Surrey, the South East of England and the United Kingdom as a whole.

137 Officers consider that the development has the potential to adversely impact the local environment and amenity by way of noise and dust. However, having assessed the development in conjunction with Surrey County Council’s Environmental Noise and Air Quality Consultant, Officers consider that the development could be made acceptable by way of conditions. The County Highway Authority and the Environment Agency have not objected to the development.

RECOMMENDATION

Officers recommend that planning application Ref. WA/2013/1223 be GRANTED subject to the following conditions:

1 The development hereby approved shall be carried out and maintained in all respects strictly in accordance with the following plans/drawings:

- Drawing: 100/01 Existing and Proposed Elevations Rev.A dated December 2012
- Drawing: 100/02 Existing and Proposed Plans Rev. B dated December 2012
- Drawing: 100/03 Block Plan Location Plan Rev. F dated December 2012

2 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 1995 (or any order revoking and/or re-enacting that Order with or without modification), no plant, buildings, structures or machinery (other than those expressly authorised by this permission), whether fixed or moveable, shall be stationed, erected, or constructed on the application site without the prior written approval of the County Planning Authority.

3 No machinery shall be operated, no process shall be carried out, and no deliveries shall be taken at or dispatched from the application site outside 0800 to 1800 hours Mondays to Fridays, and 0800 to 1300 hours on Saturdays, nor at any time on Sundays, Bank, National or Public Holidays. This condition shall not prevent the carrying out of emergency operations but these are to be notified to the County Planning Authority in writing within 5 working days.

4 The level of noise arising from any operation, plant or machinery permitted or required by this planning permission shall be limited to, when measured or re-calculated as at a height of 1.2m above ground level at a position at least 3.5m from the facade of Wetwood Cottage or
Larchwood, 42 LAeq after correction for the characteristics of the noise as defined in BS 4142 paragraph 8.2 during any 30 minute period.

5 The door of Building B shall be kept closed at all times when processing operations are being carried out within this building. No processing and/or de-canning of any waste materials shall take place anywhere on the application site other than within Building B.

6 All sorting of waste materials or any other materials shall take place within Building A. No sorting of waste materials or any other materials shall take place in the open yard area of the application site.

7 No burning of waste materials or any other materials shall take place on the application site.

8 The gate located on the south-western perimeter boundary of the application site, which leads on to the adjacent woodland, shall remained securely closed outside the hours of 0800 to 1800 Mondays to Fridays, and 0800 to 1300 on Saturdays.

9 All plant, machinery, equipment, waste materials, or any other materials associated with the development hereby permitted shall only be deposited or stored within the application site as defined by the red-line on Drawing Ref. 100/03 Block Plan Location Plan Rev. F dated December 2012.

10 The sound insulation of Building B shall be suitably maintained to the satisfaction of the County Planning Authority for the duration of the development hereby permitted so as to provide effective noise mitigation.

11 All plant, machinery and vehicles associated with the development hereby permitted shall be suitably maintained to the manufacturers specifications for the duration of the development hereby permitted.

12 Metallic waste materials shall only be deposited within waste bins and skips located outside of Building A or B between the hours of 1600 and 1700 Mondays to Fridays, and then only on no more than 3 occasions per working day.

13 The development hereby permitted shall cease and all plant, equipment and materials brought onto the land and within the buildings for the purposes of the development shall be removed within 6 months of the date of failure to meet any one of the requirements set out in (i) to (iv) below:

i Within 6 months of the date of the permission hereby granted a space shall be laid out within the site in accordance with a scheme to be submitted to and approved in writing by the County Planning Authority to provide details of: (a) Formal parking spaces for cars and goods vehicles; (b) Loading/Unloading space for goods vehicles; and (c) Dedicated turning space to enable goods vehicles to enter and leave the site in forward gear.

ii Within 6 months of the date of the permission hereby granted a Delivery Management Plan shall be submitted to and approved in writing by the County Planning Authority. The Delivery Management Plan shall provide details of: (a) Specification of the types of delivery vehicles and hours of the day when deliveries will take place; (b) The route that drivers of delivery vehicles should use to travel to the site; and (c) Details of the maximum number of delivery vehicles that can be safely accommodated within the site at any one time and measures that will be used to minimise delivery vehicles parked on Chiddingfold Road waiting to enter the site.

iii Within 6 months of the date of the permission hereby granted a Scheme for Repair and Maintenance of the concrete yard surface shall be submitted to and approved in writing by the County Planning Authority. The Scheme for Repair and Maintenance shall provide details of: (a) The area of the yard to be repaired; (b) Details of how the identified area is to be repaired; and (c) Measures for the maintenance of the repaired area and the wider concrete surface for the duration of the development hereby permitted.
Within 6 months of the date of the permission hereby granted all 20 yard and 40 yard waste receptacles associated with the development hereby permitted shall be replaced with ‘Roro’ bins with full height doors at one end. Following such replacement all metallic waste materials shall be deposited within the ‘Roro’ bins using fork lifts which are driven through the doors of the bins. These ‘Roro’ bins shall be positioned on site, in accordance with Drawing: 100/03 Block Plan Location Plan Rev. F dated December 2012, and so that the doors do not face towards the south-east.

Reasons:

1. For the avoidance of doubt and in the interests of proper planning.
2. In the interests of local amenity and to protect the amenities of neighbouring dwellings in accordance with Policy DC3 of the Surrey Waste Plan 2008.
3. In the interests of local amenity and to protect the amenities of neighbouring dwellings in accordance with Policy DC3 of the Surrey Waste Plan 2008.
4. In the interests of local amenity and to protect the amenities of neighbouring dwellings in accordance with Policy DC3 of the Surrey Waste Plan 2008.
5. In the interests of local amenity and to protect the amenities of neighbouring dwellings in accordance with Policy DC3 of the Surrey Waste Plan 2008.
6. In the interests of local amenity and to protect the amenities of neighbouring dwellings in accordance with Policy DC3 of the Surrey Waste Plan 2008.
7. In the interests of local amenity and to protect the amenities of neighbouring dwellings in accordance with Policy DC3 of the Surrey Waste Plan 2008.
8. So as to comply with the terms of the application.
9. So as to comply with the terms of the application.
10. In the interests of local amenity and to protect the amenities of neighbouring dwellings in accordance with Policy DC3 of the Surrey Waste Plan 2008.
11. In the interests of local amenity and to protect the amenities of neighbouring dwellings in accordance with Policy DC3 of the Surrey Waste Plan 2008.
12. In the interests of local amenity and to protect the amenities of neighbouring dwellings in accordance with Policy DC3 of the Surrey Waste Plan 2008.
13. In the interests of local amenity, to protect the amenities of neighbouring dwellings, and so that the development does not prejudice highway safety or cause inconvenience to local highway users in accordance with Policy DC3 of the Surrey Waste Plan 2008.

Informatives:

1. The Council confirms that in assessing this planning application 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.

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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 2012  
Planning Policy Statement 10 – Planning for Sustainable Waste Management

**The Development Plan**

The Surrey Waste Plan 2008  
The Waverley Borough Local Plan 2002 (saved policies)

**Other Documents**

The Town and Country Planning Act 1990  
The Town and Country (General Permitted Development) Order 1995