

# ***Planning Statement***

***Land at Unit 1A Hollybush Lane, Aldershot, GU11 2PX***

*Prepared by*



**Integrated Skills**

*For*

***Shorts Group Limited***

**June 2012**

[S0002/44220/PS-V1]



**DOCUMENT CONTROL SHEET**

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<b>Project</b>	Use of land for Storage, Parcel A, Unit 1A Hollybush Lane
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## **1. INTRODUCTION**

- 1.1 This document provides supplementary information to support a retrospective planning application submitted on behalf of Shorts Group Limited, to use land adjacent to Unit 1A Hollybush Lane for storing empty skips and containers.
- 1.2 The application site is situated immediately south of Unit 1A Hollybush Lane.

### **The Applicant**

- 1.3 Shorts Group Limited is a family-owned business established in 1979. The company employs approximately 100 staff. Shorts Group Limited has an established skip hire business and operate a very successful site in Ascot, which achieves 100% diversion from landfill disposal.
- 1.4 Shorts Group Limited acquired Unit 1A in 2011. Although planning permission had been granted for a waste recycling facility (obtained by the previous owner), it became apparent that the approved layout of the site would not support an efficient waste recycling operation. Shorts therefore submitted an application to vary a number of planning conditions which primarily sought to rearrange the operational layout of the site. This was approved by Hampshire County Council (HCC), reference 11/00380/HCC. All conditions have been discharged and the site has been constructed in accordance with the approved details.
- 1.5 The site commenced operating in January 2012.



## **2. THE SITE**

### **Location**

- 2.1 The application area is centred on NGR SU 884 521. The application area is shown on Drawing No. SGL/HOL-A/APP/01. The site is located immediately south of Unit 1A Hollybush Lane, which is located within the Hollybush Lane Industrial Estate.

### **Access / Exit**

- 2.2 The access to the application area will be via Unit 1A only. Prior to shorts acquisition of this site, there was an existing gated entrance to this land from Unit 1A.

### **Description**

- 2.3 The application area is approximately 0.13ha and is roughly triangular in shape. The development includes the retention of a bund and the storage of empty skips and containers in association with the adjoining permitted use.
- 2.4 The bund was constructed using loose stone and soil that had been left on the site by the previous owner. Photographs of the site, prior to acquisition show the site being used for storage of bricks, hardcore, rubble and green waste, see Appendix A. The majority of this material was removed off site, with the remaining soil and stone materials being used to construct the bund. The bund has an established vegetation cover and provides a screen for the storage area.
- 2.5 There is a spoil heap adjacent to the River. This was placed by previous occupants and will be removed as part of the development.
- 2.6 The site has been previously infilled. A Site Investigation was undertaken in May 2012, which involved excavating five trial pits. The trial pits confirmed that the site comprises of infill material.
- 2.7 The site is within the ownership of Shorts Group Limited, as shown on Drawing No. SGI/HOL-A/APP/01.

### **Planning History**

- 2.8 The application area does not have any recent planning history. With reference to supporting documents submitted with the original application for Unit 1A Hollybush Lane (Reference 07/00897), historical maps show that the application area, and adjoining industrial estate was used for mineral extraction around 1978. By 1978, the site is shown as an exhausted pit, after which it was infilled with waste.
- 2.9 In October 2007 a planning application was submitted to HCC for a waste recycling and transfer facility at Unit 1A, Hollybush Lane. Planning permission 07/00807/HCC was granted on 25 March 2009.
- 2.10 In May 2011, an application was made to HCC to vary a number of conditions of the 07/00807 consent.
- 2.11 In summary, the following changes were proposed and accepted by the Council, planning reference 11/00380.
- Relocate office
  - Relocate exit conveyor to southern side of building
  - Provision of a square building



- Provision of an external picking station instead of storage bays
- Provision of 1 entrance/exit gate, instead of two separate gates
- Provision of mess facilities

2.12 All conditions relating to both permissions were discharged by the Council.

### **Proposed Use**

2.13 It is proposed to use the land for the storage of empty skips and containers. There will be no development in the form of hardstanding required. The site layout is shown on Drawing No. SGL/HOL-A/LAY/01.

2.14 The fence along the western boundary was erected prior to occupation. No other fences or structures are proposed.

2.15 It is proposed to provide landscaping as part of the development.

### **Surrounding Land Use**

2.16 The application site lies to the immediate south of Hollybush Industrial Estate.

2.17 The Waste Recycling Facility is immediately north of the application site, which is separated by a line of conifer trees. The roundabout providing access to Hollybush Lane is to the west of the site, separated by a dense tree belt and steel palisade fence.

2.18 The River Blackwater lies to the south, beyond which lies a railway line and then residential properties off Lakeside road.

2.19 To the immediate east lies an open area of land which follows the route of the River Blackwater. This is within the applicant's control and will be set aside for landscape and biodiversity enhancement.



### **3. ENVIRONMENTAL SETTING**

#### **Geology**

- 3.1 The site has been previously infilled. The underlying geology therefore comprises of Made Ground.

#### **Hydrogeology**

- 3.2 With reference to the Environment Agency website, the underlying aquifer has no designation.

#### **Hydrology**

- 3.3 The nearest surface water body to the site the River Blackwater. With reference to the EA's flood map, the site is located within a Flood Zone 2.

#### **Ecology**

- 3.4 With reference to the MAGIC database, there are no designations within the 1km of the site. The search included Special Areas of Conservation, Special Protection Areas, Ramsar sites and National Nature Reserves.
- 3.5 A Local Nature Reserve, Lakeside Park is located approximately 200m south of the site. The nearest Site of Special Scientific Interest, the Basingstoke Canal, is located approximately 500m west of the site.

#### **Cultural Heritage**

- 3.6 There are no Scheduled Monuments within 2km of the site.

#### **Green Belt**

- 3.7 The site is not located within the Green Belt.

#### **Public Rights-of-way**

- 3.8 There are no Public Rights-of-way through the site. The nearest Right of Way is on the opposite side of the River Blackwater.



#### **4. PROPOSED DEVELOPMENT**

- 4.1 The development involves the storage of empty skips or containers in association with the adjoining Waste Recycling Facility.
- 4.2 The site occupies approximately 0.13ha. It is bordered to the south by a bund, to the west by a steel palisade fence. The northern boundary is occupied by the Waste Recycling Facility which is separated from the site by conifer trees. The eastern boundary will be delineated by proposed new trees and woodland.
- 4.3 Skips are stored according to size. Generally skips will not be stored greater than four in height. With reference to the landscape appraisal, the storage of skips at this height are not visible from the public footpath, as they remain below the bund (which is approximately 2m in height).
- 4.4 Skip vehicles will park within the main Waste Recycling Facility overnight. At the start of each day, the skip vehicle will access the application area and collect empty skips. The vehicle will then leave the site via the existing access.
- 4.5 Once a skip has been emptied within the Waste Recycling Facility building, it will either be taken off site for use at another site, or it will be stored within the application site.
- 4.6 It is difficult to establish the maximum number of skips that will be stored in the application site at any one time. The use of skips is subject to seasonality, but economically the storage of empty skips does not generate any revenue. Therefore the prolonged storage of skips is not envisaged. The storage area will be physically defined by the fence, bunds and proposed tree planting. However, on a typical day, it is envisaged that the storage area will be limited to 30-40 skips and will not exceed 4 in height.
- 4.7 The storage area will provide Shorts with the capacity required to operate an efficient facility. The need for the storage area has been described in Chapter 5.

#### **Access**

- 4.8 The access will be via the Waste Recycling Facility.

#### **Site Offices**

- 4.9 The site will be managed from the main Waste Recycling Facility.

#### **Drainage**

- 4.10 The site comprises of Made Ground, overlying infill material. It is not proposed to provide a permanent hardstanding on this site. The storage will only involve empty skips; no waste will be stored in this area and therefore there is no requirement to provide an impermeable hardstanding or drainage.
- 4.11 The site will continue to drain as currently occurs.

#### **Parking**

- 4.12 No vehicles will be parked in this area.

#### **Staffing and Employment**

- 4.13 Since January 2012, Shorts Group Limited has employed 7 personnel to work at the Hollybush Lane site.



**Hours of Operation**

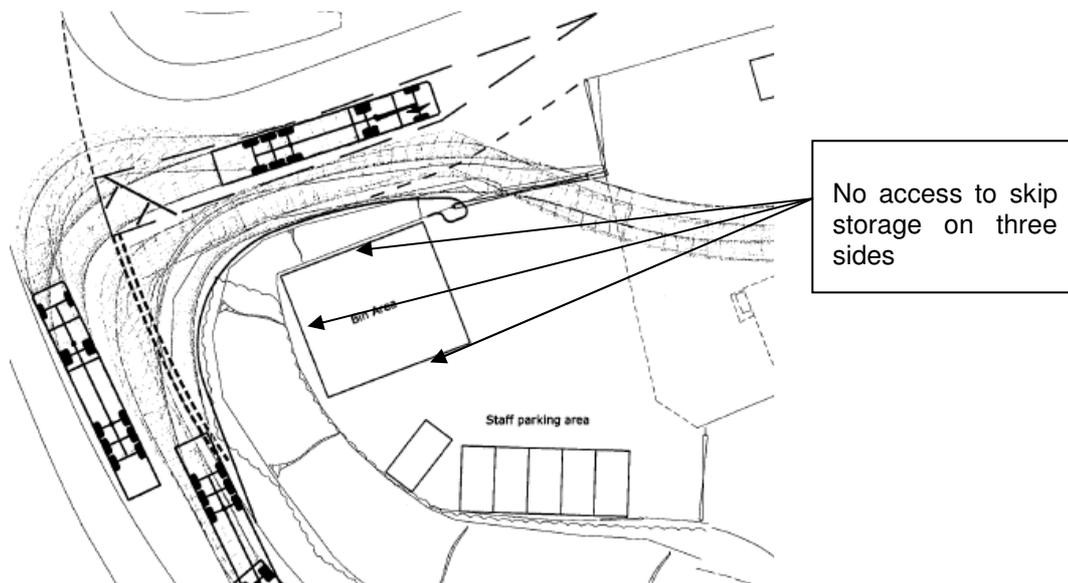
4.14 The use of the storage area will only be within the permitted operational hours.



## **5. JUSTIFICATION FOR DEVELOPMENT**

- 5.1 The need for the additional storage area has arisen from the commencement of operations at the site.
- 5.2 The original planning application was prepared by another organisation that had no waste management experience. In their design, they showed the bin storage area as a rectangular area approximately 7m by 12m, adjacent to the staff parking area. The staff parking area provided 6 spaces.
- 5.3 The approved storage area would have been difficult to access, as the area was bordered by fencing on two sides and the staff car parking area occupied the third side. This would have resulted in skips being collected or delivered by the eastern side only, see Figure 1.

**Figure – Proposed Layout as per the original application**



- 5.4 On this basis, the skips could only have been stored in one line along the rear of the bin area. Any storage of skips at the eastern side would prevent access to the rear, which in effect would render this part of the site as unusable. It is also considered that whilst skips were being collected or delivered, this would have hampered other vehicles accessing the site, due to the number of turns that would have had to be made by the skip vehicle and possibly the movement of skips to obtain access to the rear of the bin storage area.
- 5.5 In addition, it is likely that skip storage would have been undertaken within the operational area of the site, leaving less room for the storage of recyclable materials.
- 5.6 Shorts also considered that the storage of skips in close proximity to the staff/visitor parking area posed a Health and Safety risk.
- 5.7 It is also considered that the number of parking spaces provided is not sufficient for the operation. Six parking spaces were provided for staff, but no allowance was set aside for visitors such as those from the regulatory authorities. As stated, Shorts have so far employed 7 people to work at the site.
- 5.8 Since starting operations, Shorts Group Limited wanted to ensure that sufficient parking was provided on the site for staff and visitors, and thus avoid people parking on nearby roads, causing a nuisance to adjoining occupants. Since operations started, there have been no reported complaints.

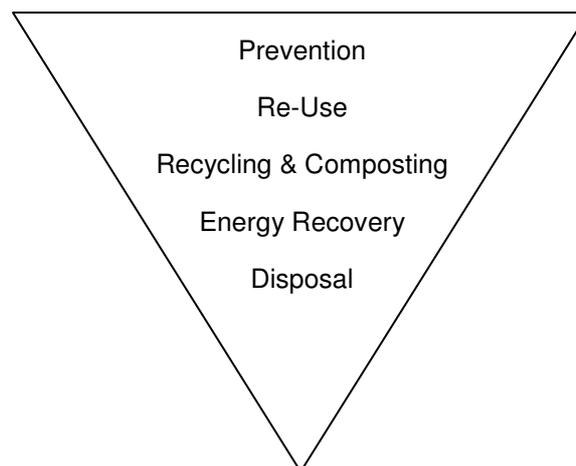


- 5.9 The original planning application did not consider these matters in line with actual operational requirements. It is considered that the bin storage area would not have enabled the waste recycling facility to operate as efficiently as is currently being achieved.

### **Planning Policy**

- 5.10 Although the application is for storage only, it has been assessed against relevant waste policy and local planning policy.
- 5.11 National planning policy on waste management is provided in Planning Policy Statement 10 (PPS10). This sets out the role of positive planning to deliver sustainable waste management.
- 5.12 The waste hierarchy remains a pivotal mechanism in determining the type of facilities required to manage waste in a sustainable manner, maximising the recovery of waste and reducing its disposal. The waste hierarchy is provided in Figure 1.

**Figure 1 - Waste Hierarchy**



- 5.13 The site is currently achieving 100% diversion from landfill disposal. The combination of the applicant's waste management experience with the operational layout of the facility, ensures the maximum recovery of recyclable materials (cardboard, paper, wood, metal, soil and hardcore). The remaining material is transferred to a facility to manufacture Refuse Derived Fuel (RDF).
- 5.14 It is considered that the success of the existing operation is based on the operational layout of the facility to enable sufficient storage for recyclable material and a clear central area for vehicle turning. The storage of skips in the application site ensures that the collection and delivery of empty skips does not impede the operation of the Waste Recycling Facility.
- 5.15 Waste development policy is provided by Hampshire County Council (HCC) as the Waste Planning Authority. The Development Plan currently includes the Minerals & Waste Core



Strategy<sup>1</sup>. HCC has recently submitted a Minerals and Waste Plan to the Planning Inspectorate. Given the progress towards this plan; the application has been assessed against the draft policies. The NPPF states that “*the more advanced the preparation, the greater the weight that may be given.*”

- 5.16 Rushmoor Borough Council’s planning policies also form part of the development plan. However, its function does not include waste development policy making or waste development control matters. The suitability of the site has been considered in light of waste policies at a national and county level. However, consideration to some local policies has been made.
- 5.17 Policies provided by HCC relate to the provision of waste development; i.e. infrastructure to manage and process waste. The application site will not be used for waste storage or treatment. Permission is sought to store empty skips on this site. Although, the emerging policies relate to waste development, they have been used in the context supporting an existing waste management facility.

### **Suitability of the Application Site**

- 5.18 It is acknowledged that the application site lies outside of the designated Industrial Estate. With reference to Rushmoor Borough Council’s proposals map the application site lies within the countryside.
- 5.19 PPS10 provides national planning policy on sustainable waste management. Paragraph 21 provides a broad range of criteria for identifying new sites. It states that planning authorities should:
- i) Assess their suitability for development against a range of the criteria including support policies of PPS10, physical and environment constraints (Annex E of PPS10), cumulative effect and capacity of existing transport infrastructure.
  - ii) Give priority to the re-use of previously-developed land, and redundant agricultural and forestry buildings and their curtilages.
- 5.20 Annex E provides a criterion based assessment to test the suitability of sites. It includes;
- a. Protection of water resources
  - b. Land stability
  - c. Visual intrusion
  - d. Nature conservation
  - e. Historic environment and built heritage
  - f. Traffic and access
  - g. Air emissions, including dust
  - h. Odours
  - i. Vermin and birds
  - j. Noise and vibration
  - k. Litter
  - l. Potential land use conflict
- 5.21 PPS10 and specifically Annex A do not preclude development in the countryside as a matter of principle. Annex E requires a consideration of the visual intrusion and states

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<sup>1</sup> Hampshire, Portsmouth, Southampton & New Forest National Park, Minerals and Waste Core Strategy, Development Plan Document 2007



*“considerations will include i) the setting of the proposed location and the potential for design-led solutions to produce acceptable development; ii) the need to protect landscapes of national importance (National Parks, Areas of Outstanding Natural Beauty and Heritage Coasts).”*

- 5.22 A landscape appraisal has been undertaken to support this application and concludes that there will be no visual impact and that with proposed landscaping there will be additional enhancement.
- 5.23 The other Annex criteria have been assessed in Chapter 6.
- 5.24 PPS10 also encourages opportunities for co-locating facilities together with complementary activities. Although this applies to the suitability of sites for new or enhanced waste management facilities, it is considered relevant as the use of the land, which is previously developed, is complementary to the adjoining waste use.
- 5.25 The proposal is therefore considered to be consistent with PPS10, where there is no presumption against development in the countryside; the development will re-use previously developed land and will be complementary to the existing waste management operation.
- 5.26 Policy 4 of the Hampshire, Portsmouth, Southampton, New Forest and South Downs, Minerals and Waste Plan, (submission February 2012) states *“Minerals and waste development in the open countryside, outside the National Parks and Areas of Outstanding Natural Beauty, will not be permitted unless:*
- a. it is a time-limited mineral extraction or related development; or*
  - b. the nature of the development is related to countryside activities and meets local needs or requires countryside or isolated location; or*
  - c. the development provides a suitable reuse of previously developed land, including redundant farm or forestry buildings and their curtilages or hard standings; and, in all cases*
  - d. the highest standards of design, operation and, where appropriate restoration, are applied.*

*Minerals and waste development in the open countryside should be subject to a requirement that it is restored in the event it is no longer required for minerals and waste use.”*

- 5.27 Policy 28 of the Waste Plan also states that development carried out predominantly in the open air (excluding biological treatment) should be on land that is allocated for industrial use or storage purposes, or is previously developed land or at active quarries or landfill sites.
- 5.28 The land adjacent to Unit 1A is previously developed land. Historically the site was used as a landfill site, and subsequently for storage. It is considered that the use of the land is suitable for the proposed purposes. The storage of skips is a simple operation. The design has been based on providing a low profile area, with enhanced landscaping.
- 5.29 Policy CP14 of Rushmoor’s Core Strategy relates to the Countryside. It states *“development for which a countryside location is required will not be permitted in the countryside outside the built up areas of Aldershot and Farnborough where it:*
- a. Adversely affects the character, appearance or landscape of the countryside, or*
  - b. Leads to harmful physical or visual coalescence between Aldershot or Farnborough and neighbouring settlements; or*
  - c. Is detrimental to recreational use.*



*The council will provide positive encouragement to schemes which result in environmental and landscape improvements, enhance biodiversity and nature conservation, support better accessibility and promote suitable recreational uses.”*

- 5.30 Although the Borough’s Core Strategy forms part of the development plan, its function does not include waste development policy making or waste development control matters. The suitability of the site has been considered in the light of waste policies at a national and county level. However, the elements of CP14 which are material to this application can be given due consideration.
- 5.31 The application site does not have any rights of public access and therefore there is no recreational use on the land, and this will not change as a result of the development. There is a Public right of Way on the opposite side of the River Blackwater and this has been given due consideration in the Landscape Assessment.
- 5.32 The applicant has sought advice from landscape and ecological consultants to develop enhancement measures on land within their control. A Landscape Impact Assessment has been undertaken and concludes that the proposal does not change in any significant way the character or appearance of the site or the surrounding landscape. The proposed landscaping proposals have been prepared in consultation with an ecologist.
- 5.33 A selection of native trees will be planted around the application site has indicated on Drawing No 12/842/01, submitted with the Landscape Assessment. A full planting plan is provided with the landscape assessment. The planting will comprise of 22 new standard tress and 45 smaller whips.
- 5.34 This woodland structure will provide a suitable screen and a good habitat for wildlife.



## **6. ENVIRONMENTAL IMPACTS AND CONTROLS**

6.1 This section deals with national and local environmental planning policy requirements.

### **Local Amenity**

6.2 Policy 9 of the submitted Waste Local Plan relates to the protection of public health, safety and amenity. Specifically it states “minerals and waste development should not;

- a. release emissions to the atmosphere, land or water (beyond recognised levels);
- b. have an unacceptable impact on human health;
- c. cause unacceptable noise, dust, lighting, vibration or odour;
- d. be visually obtrusive;
- e. potentially endanger aircraft from bird strike and structures;
- f. cause an unacceptable impact on public safety safeguarding zones;
- g. cause an unacceptable impact on coastal, surface or groundwaters;
- h. cause an unacceptable cumulative impact arising from the interactions between mineral and waste developments, and between mineral, waste and other forms of development.

6.3 The use of land for storing skips will not lead to any unacceptable off site emissions in terms of dust, mud or noise. The skip storage area is located on Made Ground which has a soil covering. This will provide noise attenuation when placing containers, as opposed to direct placement on concrete surfacing. The storage of skips will not exceed 4 in height which positions the skips behind the bund. The bund will help to prevent noise escaping beyond the southern boundary. There is a road to the west and the waste recycling facility is located to the north. This facility benefits from a 5m high acoustic fence which was constructed in accordance with planning permission.

6.4 During the dryer weather periods, the application area will be dampened using a bowser to prevent vehicles tracking over dry ground and raising loose dust.

6.5 All vehicles leaving the site will pass across the existing Waste Recycling Facility, which has an engineered site surface. All vehicles are required to leave the Waste Recycling Facility with clean wheels.

6.6 There will be no waste stored in this area.

6.7 The use of the site for storage will not have an impact on human health.

6.8 There will be no lighting in this area.

6.9 With reference to the Landscape Assessment, the development is not visually obtrusive. Proposed landscaping will enhance this area.

6.10 The proposal is considered to meet the objectives of this policy.

### **Biodiversity**

6.11 Policy 2 of the Minerals and Waste Plan<sup>2</sup>, requires protection of habitats and species including, SPAs, SACs, Ramsar, SSSIs, National Nature Reserves, Local Nature Reserves,

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<sup>2</sup> Hampshire, Portsmouth, Southampton, New Forest and South Downs, Minerals and Waste Plan, Submission February 2012



Sites of Importance for Nature Conservation, habitats and species of principal importance in England and identified in the UK or Hampshire Authorities Biodiversity Action Plans.

- 6.12 With reference to the MAGIC database, there are no ecological designations within the 1km of the site. The search included Special Areas of Conservation, Special Protection Areas and Ramsar sites. The Basingstoke Canal Site of Special Scientific Interest is within 500m of the site.
- 6.13 At a local level, Lakeside Park is designated as a Local Nature Reserve and a Site of Importance for Nature Conservation (SINC). This is about 200m south of the application site.
- 6.14 The site itself is not designated and supports little opportunities for ecology. A walkover field survey was undertaken on the 8 June 2012 by Lee Morgan of LM Ecology. This confirmed that the central area of the application site is unsuitable for planting on account of the filled nature of the ground and its compaction.
- 6.15 LM Ecology confirmed that the current proposals for skip storage are not harmful to the habitat of the Blackwater River and that there was considerable natural regeneration of flora taking place on the bund and around the site. It was found that the bund enclosing the application site, and shown on drawing SGL/HOL-A/LAY/01, was already well covered with plant growth that was appropriate for this riverside location.

### **Parking Provision**

- 6.16 There will be no vehicle parking in this area.

### **Flood Risk**

- 6.17 The NPPF provides technical guidance on the flood risk.
- 6.18 Policy 10 of the submitted Waste Plan states that waste development in areas at risk of flooding should not result in an increased flood risk elsewhere, incorporate flood protection, have site drainage systems, not increase net surface water runoff and if appropriate use Sustainable Drainage Systems.
- 6.19 A Flood Risk Assessment has been prepared to accompany the application.
- 6.20 With reference to the Environment Agency website, the underlying geology is designated as a non aquifer. There are no Groundwater Source Protection Zones within the vicinity of the site.
- 6.21 The site is located within Flood Risk Zone 2, which has the least probability of flooding. The proposed use is a less vulnerable land use and is appropriate within this flood zone. The Flood Risk Assessment concluded that there will be no flood risk.

### **Heritage Statement**

- 6.22 The site is located adjacent to an established industrial estate, and was previously used for mineral extraction, infill and storage. The proposed development will have no impact on the local heritage. There are no Scheduled Monuments within 1.5km of the site. The proposal is consistent with Policy 6 of the Submitted Waste Local Plan.

### **Lighting**

- 6.23 There will be no lighting requirements in this area.



### **Traffic**

- 6.24 There will be no further traffic associated with the development. The application site is accessed directly from the Waste Recycling Facility and therefore no changes are required.

### **Land Contamination Assessment**

- 6.25 The site is located within a previously developed area. The use of the site for storage is not considered to be a sensitive use. A Site Investigation has been undertaken to confirm the nature of the ground conditions.

### **Landscape**

- 6.26 A Landscape Assessment has been undertaken, see separate report. This concluded that the proposal will not change in any significant way the character or appearance of the site or surrounding landscape.

### **Climate Change**

- 6.27 Policy 1 of the submitted Waste Local Plan requires waste development to minimise their impact on the causes of climate change. In this instance, if planning permission is not granted, then in order to continue with the efficient proposed operation, the applicant may seek to store empty skips at alternative premises. This would lead to unnecessary, additional transport movements.
- 6.28 The location of the skip storage area adjacent to the Waste Recycling Facility is considered to be an efficient use of previously developed land and will help reduce greenhouse gas emissions, by minimising transport movements.
- 6.29 The policy also requires waste development to avoid areas of vulnerability to climate change and flood risk. This has been addressed previously.



## **7. CONCLUSION**

- 7.1 This Planning Statement has been prepared to support an application to use land adjacent to Unit 1A Hollybush Lane for storage of empty skips.
- 7.2 Although the application site is located within the countryside, there is no presumption against development in the countryside at national or local policy level. The proposed development will be ancillary to the existing waste management facility, and will enable the continued efficient operation of that facility.
- 7.3 The existing waste management facility is currently diverting 100% of waste from landfill disposal.
- 7.4 It is proposed to provide further landscaping around the operational area, as well as provide a woodland area in other land under the control of the applicant.

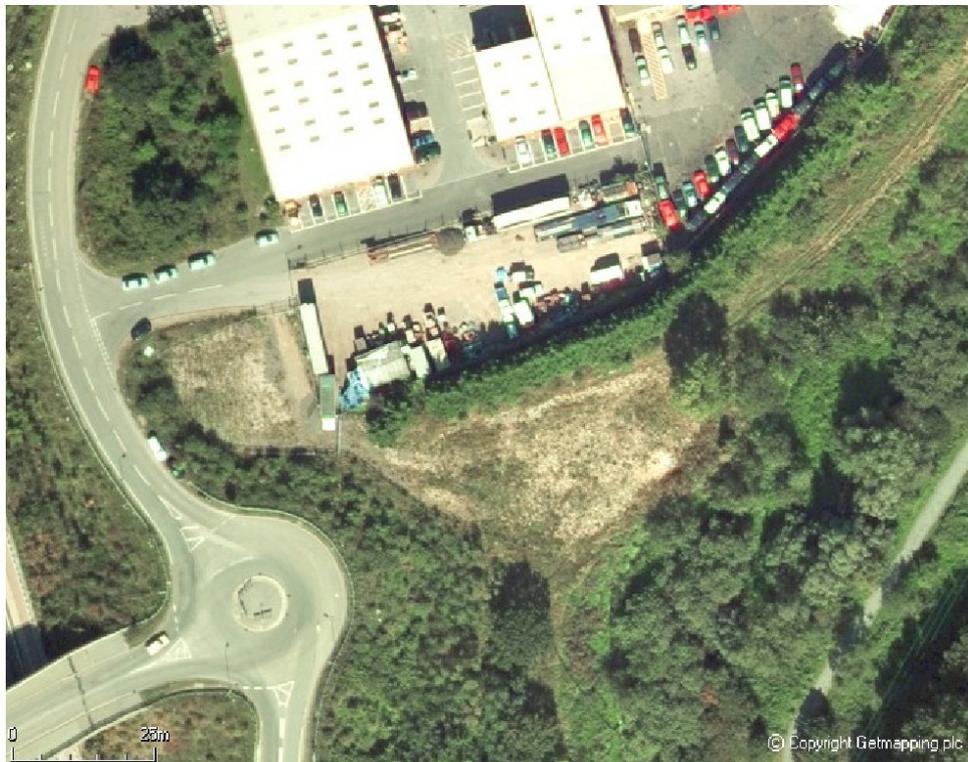


**DRAWINGS**

SGL/HOL-A/LOC/01	Location Plan
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## Appendix A – Photographs

Photograph 1 – View of the site prior to Shorts Acquisition. Note that the application area is similar in appearance to the land immediately west of the haulage yard.



Photograph 2 – View of application site in February 2011. Mounds of hardcore and soil were left on the site at the time of acquisition. The Made Ground surface is visible.



Photograph 3 – View of the Site in December 2010 – Note the spoil heap which is to be removed. The ground cover is visible showing a Made Ground surface.

