

## Item C2

### **DA/10/1232 – Change of use of part of yard from open storage to increase area for waste transfer and recycling of waste, and provision of a trommel with covered waste sorting facility, partly within existing yard and partly within new extended area of yard, Lees Yard, Rochester Way, Dartford, Kent, DA1 2QU.**

A report by Head of Planning Applications Group to Planning Applications Committee on 15 March 2011.

This application has been submitted by Graham Simpkin Planning on behalf of Easy Load Ltd for the proposed change of use of part of the existing yard from open storage to waste transfer and recycling of waste with the provision of a trommel with covered waste sorting facility.

Recommendation: Permission be granted subject to conditions

Local Members: Jan Ozog

Unrestricted

#### **Site location and description**

##### *Site Location*

1. The application site is within an existing waste transfer station and within the Metropolitan Green Belt, on the western extremity of the Borough of Dartford, adjoining Dartford Heath and at the boundary with the London Borough of Bexley. To the south of the site is an area designated as a Site for Nature Conservation Interest.
2. Access is via Rochester Way a two lane carriageway, which runs west to east and is a 'dead-end' for vehicles that access it from the A2018 (See Plan 1: Site Location Plan). Rochester Way was used before the construction of the A2 (East Rochester Way), as the main road link between Dartford and Bexley. To the south of Rochester Way is an area of woodland, which extends further south to the A2 and east towards the built-up area of Dartford.
3. The application site forms part of a cluster of comparable uses that are congregated on the northern side of Rochester Way. The uses comprise F W Conway (north), Kent Household Waste recycling facility (east), South East Building Supplies (west) and other storage type uses. These uses including the Easy Load site are located on a raised platform where the land slopes downwards (north) towards the housing area known as Braeburn Park (see Plan 1 Site Location Plan).
4. A landscaping bund is located between this cluster of uses and the relatively new Braeburn Park Housing Estate (see Plan 1 Site Location Plan), approximately 140 metres away. It was required by Bexley Borough Council as a means to visually protect

the residential properties from the industrial and waste-related uses already mentioned. That includes the more prominent aggregate screening, crushing and washing activities of F M Conway. It was also designed to contribute in a positive sense to the local landscape setting. Planting was required on top of the bund but has so far not appeared.

#### *Site Description*

5. The waste transfer station overall is on elevated and sloping ground. The application site area is approximately 0.56 hectares and is bound on three sides by a 4 / 5 metre high concrete wall. The site has a dedicated access point as well as a separate access through neighbouring units reserved strictly for emergency access.
6. The site is divided into two main parts with the waste transfer activity, waste stockpiles and plant and machinery in the area of the yard first traversed from the access point and a side 'extension' used for skip storage and vehicle parking.
7. The site contains a collection of buildings including a two storey administrative office, vehicle maintenance workshop, two-storey staff training and canteen facility and weighbridge; all congregated within the south-eastern corner of the site, nearest to the entrance point. There are also ancillary containers and a fuel tank located on the opposite side of the access (See Plan 2: Existing Site Layout Plan). The internal site platform is concreted allowing for vehicle circulation and an engineered drainage system.

#### **Planning Background**

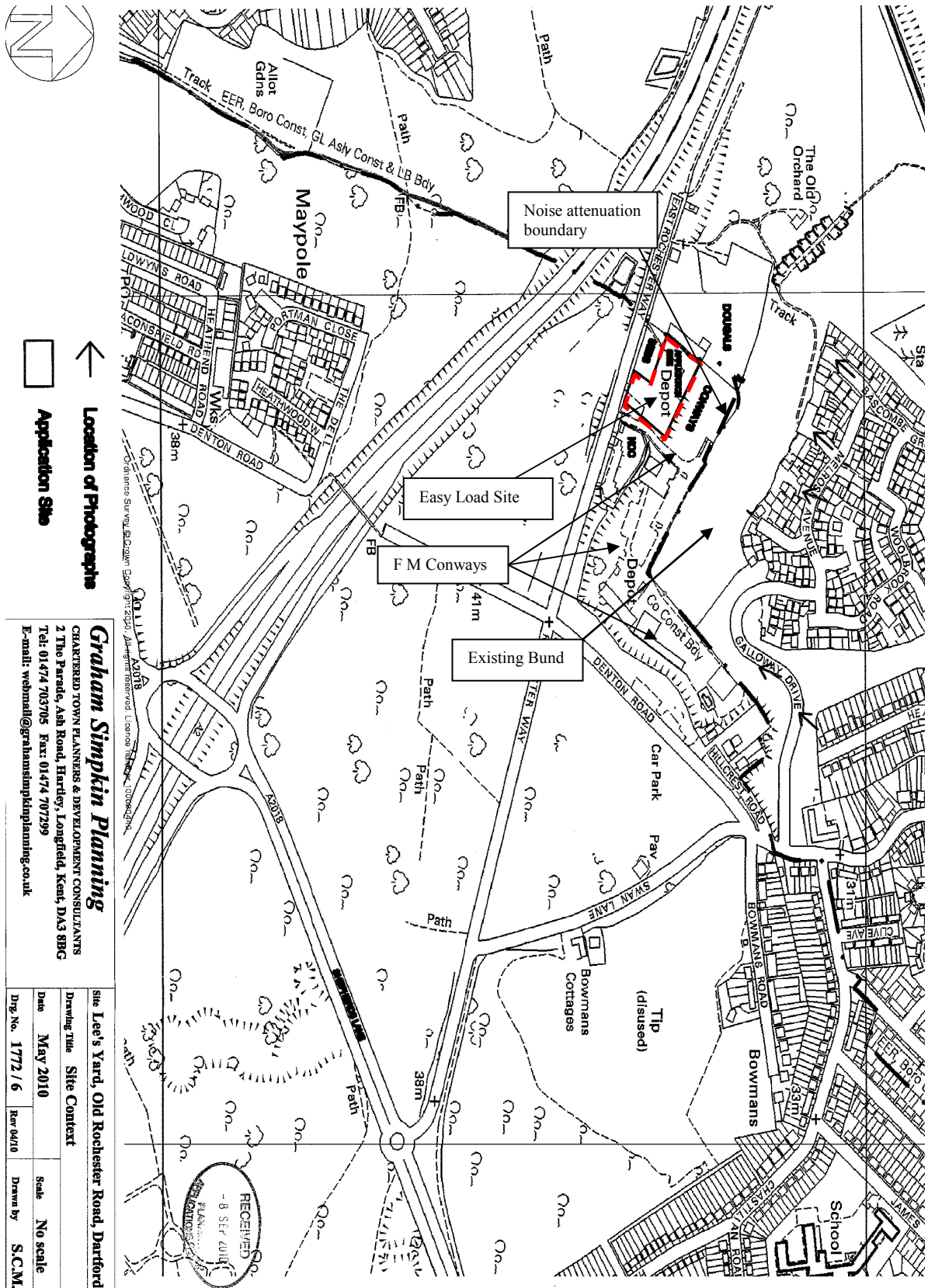
8. The application site has been operated, as a waste transfer station since 1988. A more limited activity preceded that in one corner of the site.
9. Easy Load Ltd, the current applicants began operating the site under planning permission DA/96/722 in 1996, for the continued use of the waste transfer station, including a new ancillary office and store room, housed together with a maintenance and repair workshop building.
10. The current use provides a service for the collection of waste for sorting and recycling to customers within a 20 mile radius. Landfill disposal is in Essex.
11. A continuing programme of investment in site improvements and operational efficiencies has occurred since the applicant acquired the unit. That has included planning permissions for: extended opening hours (Saturdays until 16:30 and Sunday opening 09:00-16:30); new buildings for office, training and staff welfare purposes and the introduction of more modern plant and machinery.
12. An unfortunate phase of alleged breaching in 2005, led to the service by the County Council of an Enforcement Notice against stone crushing and screening within the 'extension' area. The use ceased but the confirmed Notice remains in place.
13. A period of detailed site negotiations ensued. Planning permission DA/09/974 was subsequently granted in 2009 for parking and storage of skips and lorries in support of the main waste transfer activity. Nevertheless, an unauthorised screening machine is currently being used on site, which has been brought to the applicant's attention. Assurances have been given that it will be removed shortly; a matter which I shall pursue separately under the auspices of the Regulation Committee.

## Proposal

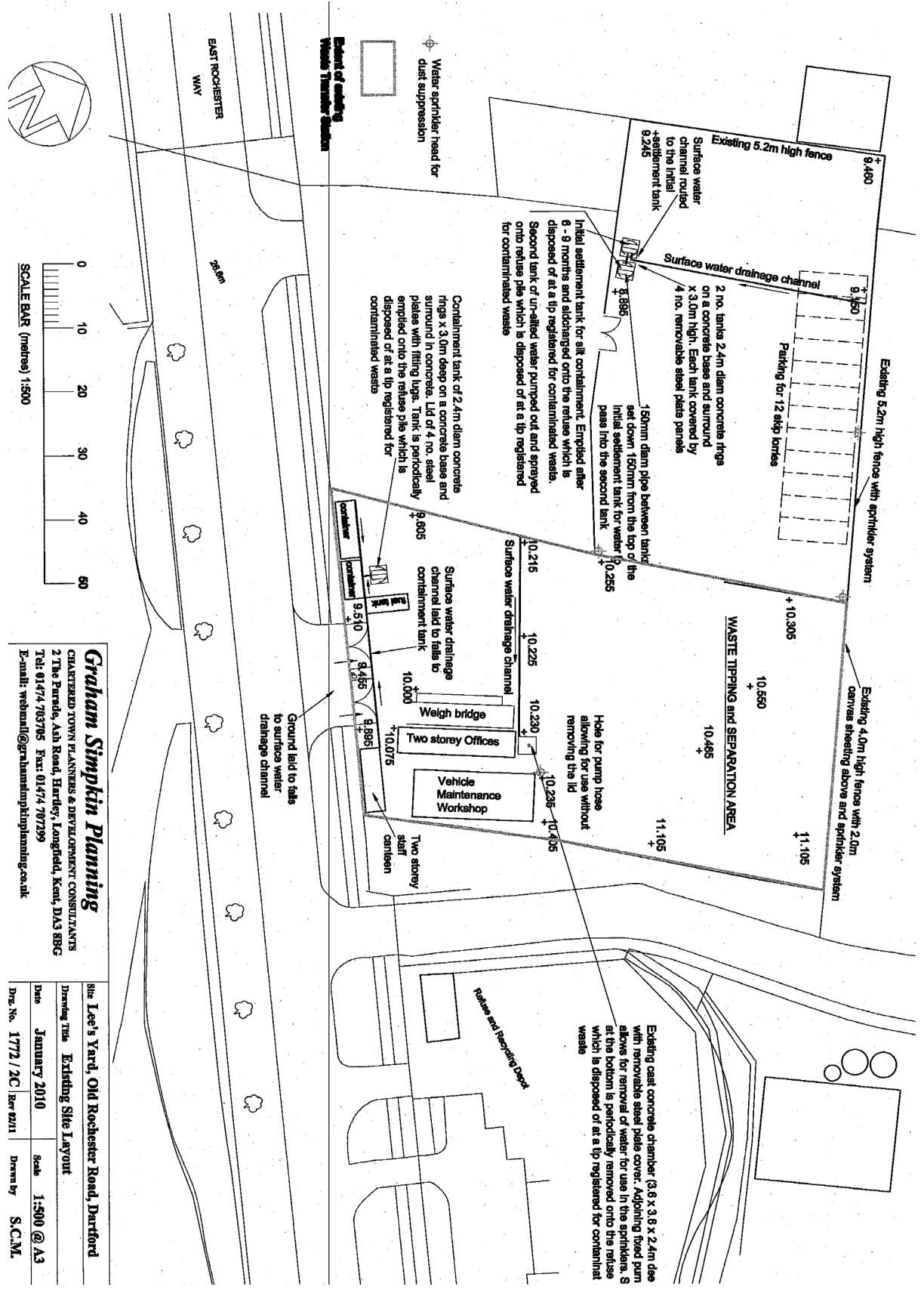
14. The proposal seeks to extend the area and extent of waste separation and recycling at the site by internal rearrangement, relocation of the majority of existing storage and parking and the introduction of dedicated plant and machinery.
15. Currently, mixed skip waste is brought onto the site, weighed, tipped, separated and sorted. Reusable and recyclable materials are extracted, leaving a residue for landfill. The operation involves up to 6 manual pickers sorting waste whilst lorries tip around them. A mechanical 360<sup>0</sup> grab crane is also used which moves larger components of waste material into a metal container for removal off-site.
16. The current waste sorting and recycling operation is considered by the applicant to be less than efficient with only 30-40% of the waste being recycled and the rest going to landfill. It is proposed to address this deficit in two ways.
17. Firstly, the waste handling area of the station would be extended over that part of the site (the 'extension' area) currently used for skip storage and skip lorry parking. The operator proposes to relocate the existing 500 skips and 12 skip lorries to a nearby skips storage site that he owns in Bexley, known as 'The Old Orchard'. However, he would retain and park 3 articulated vehicles on the waste site overnight.
18. Secondly, mechanical screening of waste would be introduced, through the use of a 'Trommel' machine and picking station. The relevant dimensions are shown on Plan 4: 'Trommel Elevations'.
19. The waste brought onto the site would be tipped into designated areas either side of the site; heavy waste to the east and commercial waste to the west. The proposed Trommel and picking station would be located between these areas, close to the site boundary. The applicant advises that the separation of these waste types would aid recycling and make it easier to sort, separate and export (See Plan 3 Proposed Site Layout). In fact, according to the applicant this new operational arrangement offers the possibility of waste separation rates of up to 60-70%. In other words, the greater part of the waste stream handled at the site would be recovered, leaving a much reduced proportion simply consigned to landfill.
20. In doing so, there would be neither change in the waste stream, nor increase in hours of operation, throughput and traffic movements into and out of the site. The proposal is directed instead towards improving the efficiency and sustainability of existing waste management methods on site.
21. As part of his set of proposals, the applicant has attempted to safeguard against any potential visual, noise, dust or odour amenity problems encountered.
22. In visual terms, the proposed Trommel would be positioned immediately (1 metre distance) behind the 5 metre high northern site boundary. This it is claimed would visually shield the plant, leaving only the top of the picking station and certain angular sections of the Trommel protruding above the boundary fence.
23. To address the remaining amenity issues, the applicant has submitted noise, dust and odour assessment studies. To add to their veracity, the applicant stresses that the methodologies for the assessments were agreed with the County Council and relevant advisers prior to the assessments being undertaken.

24. The applicant's noise study, having taken all relevant variables into account, concluded that this potential amenity impact, with appropriate siting of the Trommel and other internal safeguards, fell below background noise levels, as measured from the nearest sensitive receptor (the nearest house in Braeburn Park housing estate). It noted however that the setting of the Trommel and its relationship to the site boundary would be crucial in achieving the required noise management. The optimal distance from the site boundary was calculated as being 1 metre (on the assumption of the same size and noise-rated plant). That 'set-back' distance and fixed location for the Trommel is reflected in the proposed scheme.
25. The related assessments identify dusty releases from site operations and odours from any putrescible waste that has been allowed to decompose, as being the two other potential amenity impacts requiring particular attention and safeguarding.
26. The dust assessment states that the majority of waste materials (85%) handled at the site are not potentially dusty and the activities that are potentially so would be undertaken in an area which is bordered on the northern boundary by a sprinkler system used to suppress dust emissions. Good site housekeeping measures such as frequent yard sweeping and dampening down are recommended, which would further mitigate dust releases. The Trommel itself would also have its own water spray system.
27. Odour control and mitigation would largely be attained through standard EA waste transfer permitting controls which require amongst other controls that any odorous waste inputs to the site be removed within 48 hours from their arrival. This in addition to good practice measures such as containment of surface waste water drainage are considered sufficient through the odour assessment study for safeguarding purposes. That in turn is in the knowledge of prevailing wind direction and all other relevant variables in relation to residential amenity vulnerability and available controls and management.
28. Indeed, the operator is proposing to extend the sprinkler system by installing new spray 'bays' over active areas to continue to mitigate any adverse emissions from the site being released into the atmosphere.

Plan 1: Site Location Plan



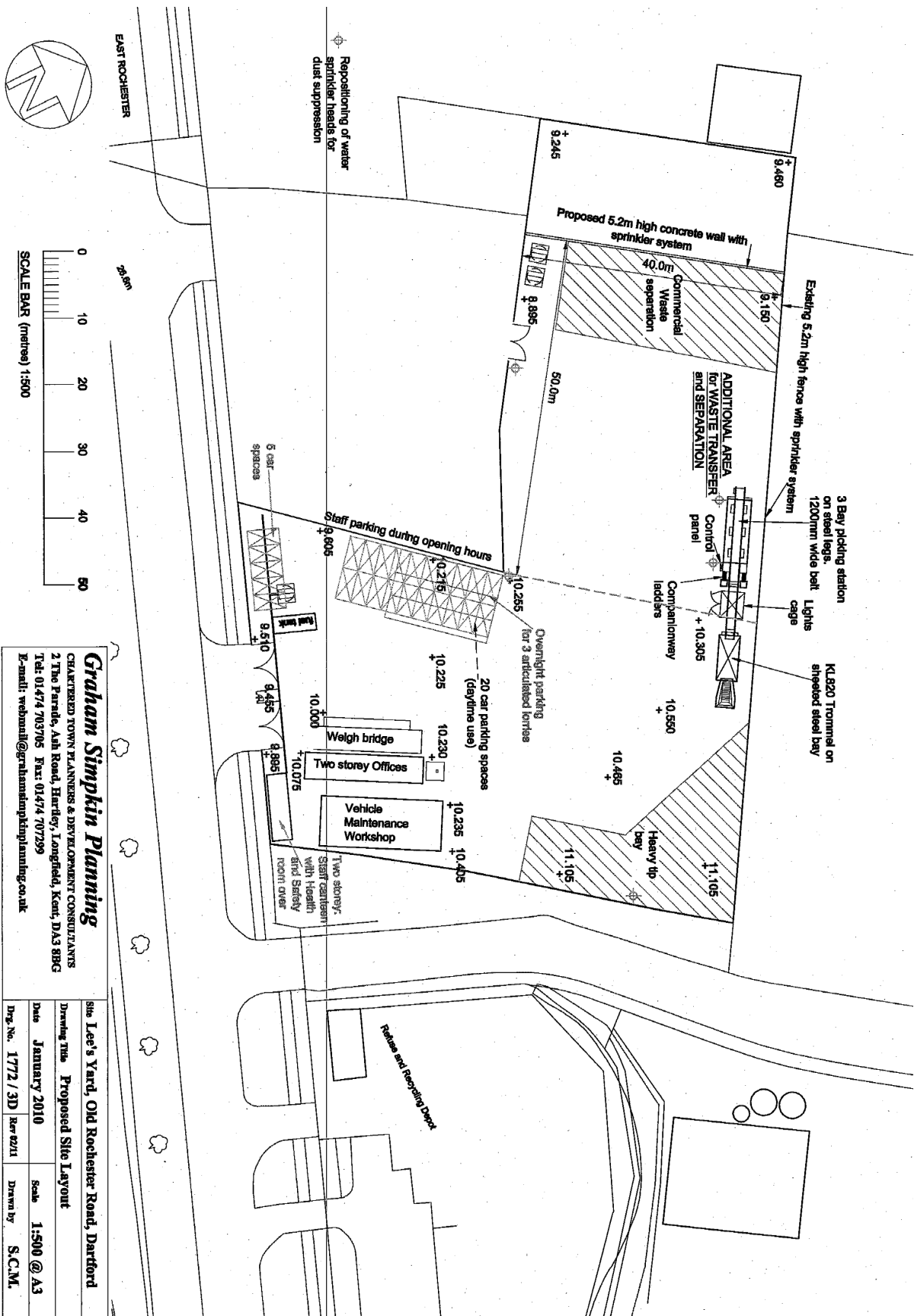
Plan 2: Existing Site Layout Plan



Plan 3: Proposed Site Layout

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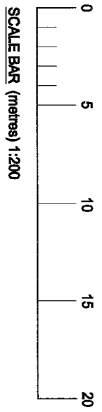
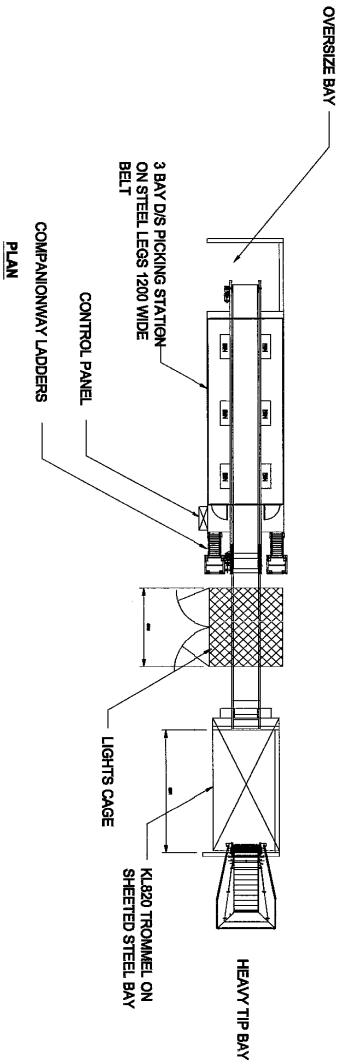
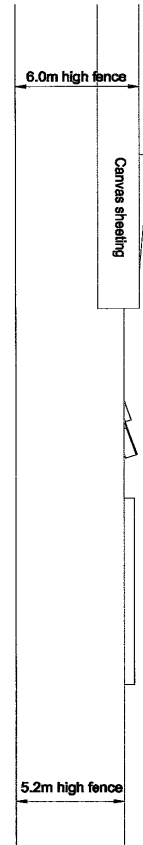
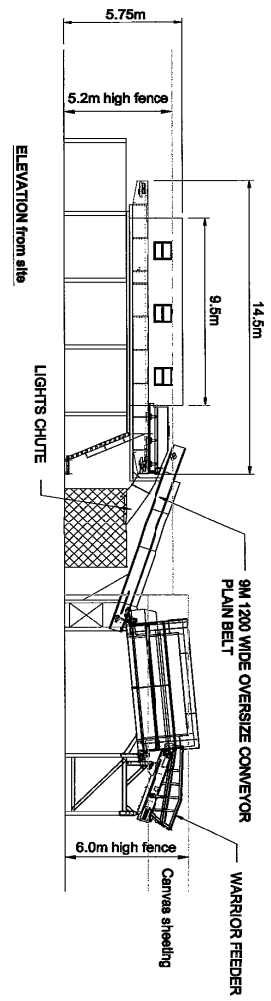
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Drawing Title: Existing Site Layout	
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Plan 4: Trommel Elevations (not to scale)



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## **Planning Policy Context**

29. The Development Plan planning policies summarised below are relevant to consideration of the application:

**National Guidance** – The most relevant to this application is set out in: PPS 2 (Green Belts and ‘The Town and Country Planning (Consultation) (England) Direction (2009)’ as far as it concerns development in the (Metropolitan) Greenbelt, PPS10 (Planning for Sustainable Waste Management), PPS23 (Planning and Pollution Control) and PPG24 (Planning and Noise).

**South East Plan (2009)** – The most relevant policy is W7 (priority to safeguarding and expanding suitable sites within an existing waste management use).

### ***Important note regarding the South East Plan:***

*As a result of the judgement in the case brought by Cala Homes in the High Court, which held that the powers set out in section 79 [6] of the Local Democracy, Economic Development and Construction Act 2009 could not be used to revoke all Regional Strategies in their entirety, Regional Strategies (the South East Plan in the case of Kent) were re-affirmed as part of the Development Plan on 10 November 2010. Notwithstanding this, DCLG’s Chief Planner Steve Quartermain advised Local Planning Authorities on 10 November 2010 that they should still have regard to the Secretary of State’s letter to Local Planning Authorities and to the Planning Inspectorate dated 27 May 2010. In that letter he had informed them of the Government’s intention to abolish Regional Strategies in the Localism Bill and that he expected them to have regard to this as a material consideration in any planning decisions. The 10th November 2010 Quartermain Letter has since been challenged in the High Court with the outcome, that the intention of the Secretary of State to dispense with the services of the South-East Regional Plan is a material planning consideration in its own right. Account must still be taken of the Plan as such but a judgment needs to be made by Planning Authorities as to the degree of weight to be attached to its provisions in the context of individual cases.*

That stands as the latest judgement on the matter, subject to the outcome of a further appeal, which has now been lodged within the Supreme Court. A hearing and further judgment is awaited.

**Kent Waste Local Plan (1998)** – The most relevant saved policies are W3 (Locational Criteria), W6 (Consideration of need), W9 (Locational criteria for waste transfer stations), W18 (Noise, Dust and Odour), W19 (Groundwater protection), W22 (Provision for adequate access arrangements including the need for any off-site highway improvements), W25 (Plant and Buildings) and W31 (Visual Impact and Landscaping).

**Dartford Borough Council Local Plan (1995)** – The most relevant saved policies and the policies contained in the Amended Second Deposit Draft (2004) – GB1, GB2 and B1, and GB1, GB2, GB6, RT14, C14, NR10, NR14 and NR16, respectively.

## Consultations

30. **Dartford Borough Council** – *“The Borough Council would wish to raise no objection subject to consideration of the following conditions, should Kent County Council be minded to approve:*

*01 The applicant should be required to ensure that existing dust suppression mechanisms such as water spraying and conveyor screening area maintained in sufficient working order and fully utilised to mitigate/suppress dust from the operations affecting local residents*

*02 Stockpiled material should be maintained at a maximum height of 5 metres above the site ground level.*

*03 Hours of operation should remain unchanged and controlled by a condition on the new permission”*

31. **London Borough of Bexley** – Objects to this application on the grounds of adverse impact from noise and dust impacts on the residents in Braeburn Park housing estate.

32. **The Divisional Transport Manager** – DTM has no objections to the use in respect of highway matters subject to no increase in the permitted amount of waste the site can import.

33. **Jacobs Noise, Odour and Dust** – Jacobs have advised the following:

Noise:

*“The setting of the trommel and its relationship to the barrier is crucial in achieving the required noise reductions. If the application were conditioned such that the trommel was required to be 1m from the noise fence and matched the technical spec (size, noise rating etc) used in the assessment then I do not see that noise can be a reason to delay the application. Noise levels from the application [site] will be within the relevant planning guidelines at the closest residential with the adoption of the mitigation measures mentioned in the noise report”*

Dust:

*“With regards to dust the expansion of the current dust suppression measures to the new area together with the trommel having its water spray suppression system would make the impact of dust emissions at the surrounding properties unlikely.”*

Odour:

*“In terms of odours, the waste materials consist predominately of inert or slowly degradable waste that doesn't give rise to odours. Only a small amount of putrescible waste is permitted on site and all waste is only meant to be kept at the site for a maximum of 48 hours and therefore there is little opportunity for any materials to initiate decomposition such that they could result in emissions of odour from the site. Spreading of material over a greater [area] would have little effect on the possible emissions of odour and would possibly result in a reduction in the sites potential to do so.”*

34. **Environment Agency** – *“This site includes an area that has planning permission and a waste permit and has been operating with no major problems for a long period as a waste transfer station. As described, the new area is now integrated into the yard and is*

*being used for storage of non-waste material.*

*The main comment is that Easy Load will need to vary their waste permit to cover the new area and the operation of a trommel and picking line if this planning permission is granted.*

*We consider that planning permission should only be granted to the proposed development as submitted if the following planning condition is imposed as set out below. Without the condition, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the application.*

*Condition: If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, an amendment to the remediation strategy detailing how this unsuspected contamination shall be dealt with."*

## **Representations**

35. The application has been publicised by the displaying of a site notice on a sign post along Rochester Way and newspaper advertisement in the local press. Letters of notification were also sent to all the properties within 250 metres of the site.
36. Seven letters/emails of objection have been received (to date) all from the residents of Braeburn Park housing area. They have expressed common concerns regarding impacts from the perceived increase in traffic generation and potential noise, dust and odour pollution from the proposed activity.

## **Local Member**

37. The County Council Member Jan Ozog was consulted and, to date, no comments have been received.

## **Discussion**

38. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. In the context of this application, the policies outlined in paragraph (26) above are in my opinion of greatest relevance.

## **Main issues:**

39. The main determining issues, in my view, are the:
  - Appropriateness of the proposed development within the Metropolitan Green Belt (MGB)
  - Case of need; in general and for the use of this particular site.
  - Suitability of the location itself for the proposed use.
  - Likely amenity impacts and available safeguarding measures

### ***Appropriateness within the Metropolitan Green Belt***

40. PPS 2 (Green Belts) contains a presumption against inappropriate development within the (Metropolitan) Green Belt. In accordance with the relevant Government Direction (The Town and Country Planning (Consultation) (England) Direction (2009), any proposed development which consists of or includes 'inappropriate development' within the Greenbelt, has to be referred to the Secretary of State for Communities and Local Government, as a departure from the Development Plan. For the purposes of the Direction, that would include any development which *'by reason of its scale, or nature or location, would have a significant impact on the openness of the Greenbelt'*.
41. For the current proposal not to be deemed as 'inappropriate development' within the MGB (so avoiding referral as a departure to the Secretary of State), PPS 2 states that *'very special circumstances'* need to apply.
42. In making an assessment on those grounds, it is material that the proposed development would be within and integral to an established waste transfer use within the MGB. That in turn is located and contained within an existing industrial estate with industrial, open-storage and other waste-related uses. There would be no increase in the range of wastes, hours of operation and the level of throughput or any change in traffic movements, from that associated with the current use. Additionally, as a result of the application, there is scope to seek to elevate the existing level of safeguarding against noise, dust, odour and related amenity impacts from the use of the site.
43. Taking all of these factors into account, I conclude that the scale, nature and location of the proposed development would not have a significant impact on the openness of the MGB and therefore does not need to be referred to the Secretary of State as a departure from the Development Plan. On that judgement it is considered open for the County Council to grant planning permission, with conditions.

### ***Case of need:***

44. There is an acknowledged general case of need within the context of KWLP 'saved' Policy W6 (need considerations), for increases in the level and efficiency of waste separation and recycling. That is especially the case at established sites with existing capacity and potential for such improvements. Easy Load Ltd is conveniently located within range of the urban areas of Dartford, Gravesham and Bexley; reinforced by ready access to the Primary Route Network, via Rochester Way and the A2018 onto the A2. A definable catchment area exists, which has been serviced since 1986 by the current permitted waste transfer station and since 1996 by the applicant's own operation. A continuing pattern of need is apparent, which is potentially able to be met in a more sustainable way from enhanced waste management practices at the subject site. That waste management objective is in my view worthy of support both in general and in the context of this particular site.
45. To emphasise the point, the proposal represents a reversal of fortune in waste management terms. Central to the scheme is that up to 70% of incoming waste would be 'recovered' for further recycling or beneficial use. I understand that the reverse is currently the case, where a comparable percentage goes straight to landfill. This waste recycling initiative is in line with and actively supported by Government guidance, such as PPS10 (Planning for Sustainable Waste Management) and relevant parts of the Development Plan.

### ***Suitability of the location***

46. Kent Waste Local Plan (KWLP) 'saved' Policy W9, sets general criteria for assessing the suitability of waste separation and transfer stations within their surrounding site contexts.

#### ***Minimising Environmental and Amenity Impacts***

47. The first suitability criterion is that any scheme should seek to minimise environmental and amenity impacts. These potentially include in the context of this particular application, amenity impacts from: visual intrusion, noise, dust, odour and traffic movements. I shall consider the issue of potential visual intrusion in this section given its wider locational relevance but defer the remaining KWLP Policy 18 (noise, dust and odour) issues and Policy W22 (traffic impacts) to the next and more appropriate amenity and safeguarding section under paragraphs (52) to (67).
48. Visual intrusion is an important potential amenity impact to consider. That is particularly the case as the application site and adjoining uses are located on an elevated platform, capable as a whole of being seen from selective vantage points in the vicinity of the Braeburn Park Housing Estate, lower down and to the north of the site. In terms of the visual impact of the specific proposal, whilst it is true that some protrusion would occur above the 5 metre boundary height, I regard this as marginal in its setting and context. In general, the intervening bund can be relied upon for effective visual mitigation from views from the housing estate in the direction of the application site. My conclusion on this aspect is that whilst the top of the proposed picking station and minor gantry detail might be visible from the medium distance, the existing visual envelope and presence of the landscape bund (with planting still in reserve) means that this would not be overriding in its own right.

#### ***Ready Access to the Main Road Network***

49. The second suitability criterion under KWLP Policy W9 is for ready access to be available to the main road network. That is the case via Rochester Way and the A2018, which connects with the A2 and then the M2. The proposal therefore complies with this second part of the policy.

#### ***Location within the context of other Waste or Industrial Uses***

50. Location within or adjacent to existing waste management facilities, or within an industrial setting, is the third criterion within KWLP Policy W9. The application site is within an industrial estate and is located next to the FM Conway's waste management facility and near to the County Council's own Civic Amenity Site. The proposal therefore qualifies on these grounds.
51. My conclusion to this section is that in terms of potential visual intrusion (with all other amenity impacts deferred to the next section), highway accessibility and conformity of use, the safeguarding requirements of KWLP Policy W9 are adequately met.

#### ***Amenity impacts and available safeguarding measures***

52. Kent Waste Local Plan (KWLP) 'saved' Policy W18 requires the application to be assessed against the means of control of noise, dust, odour and any related emissions,

in respect of potential impacts on neighbouring landuses and amenity. That would include for instance, those members of the public using the nearby KCC Civic Amenity Site as well as residents of the Braeburn Park housing area.

53. It is important to stress at the beginning of this amenity and safeguarding section that the proposed development involves no change in the types of waste coming to the site, nor in relation to operating hours, throughput or traffic movements. The status quo would be maintained in those key regards. Internal site changes would be evident but short of the visual aspects discussed under paragraph (48) above, there should be no discernable difference from an outside perspective.
54. Notwithstanding that, objections have been received from some residents within the Braeburn Park housing area regarding potential impacts upon them from noise, dust and odour emissions. These objections have been supported by Bexley Borough Council. The local residents have also raised concern over perceived proposed increases in traffic movements to and from the site.
55. To address these anticipated amenity issues (beyond those of visual integrity), the applicant has submitted noise, dust and odour assessment studies. The methodologies were agreed in advance with this Authority. I shall take each in turn.

#### *Noise*

56. In paragraph 24 of the 'Proposals' section of this report, details are given of the applicant's noise assessment study. The waste separating Trommel plant has been identified within that appraisal as the point at issue in noise impact terms. The potential impact on residents of Braeburn Park has been the main focus of attention. Jacobs (Noise) have evaluated the contents of the study and concur overall with the applicant's approach and conclusions. They comment in particular that *'the setting of the Trommel and its relationship to the barrier (the site boundary) is crucial in achieving the required noise reductions'*.
57. These respective assessments and conclusions are based on known variables and a fixed technical specification and location for the Trommel, including a 1 metre 'set-back' distance from the site boundary. These aspects may be conditioned to ensure that noise generation and management are held in balance at all times during operation of the plant. In the knowledge of all other key operational aspects being equal (see paragraph 20), and in light of the provisos on the Trommel just given, together with the adoption of related mitigation measures mentioned in the noise report, they conclude that *'noise levels from the application [site] will be within the relevant planning guidelines at the closest residential point'*. Jacobs therefore have no planning objection to the application.
58. In these circumstances, I consider that noise as an amenity impact, within set and controllable parameters would not be overriding, especially given further available controls through the EA Permit on site. The proposed scheme therefore accords in my opinion with the noise control element of KWLP Policy W18.

#### *Dust*

59. The applicant's dust assessment identifies the key concern as being dusty releases from waste handling operations and the most sensitive receptors as being residents of Braeburn Park.
60. Details of the applicant's dust assessment study and safeguarding provisions are given

in paragraph 26 of this report. It maintains that only 25% of waste materials on site have potential for any material dust impact off-site. It stresses that any dust problem would be containable with the existing water sprinkler system; in turn to be expanded, with run-off helping to lay any general dusty residues on the concrete pad within the yard. Good site housekeeping measures are again highlighted such as frequent yard sweeping and dampening down.

61. Jacobs (Dust) have raised no specific dust related concerns. They acknowledge in particular the proposed expansion of the site sprinkler system and the Trommel's own in-built water spray system. Overall, they have registered no planning objection to the proposed scheme from a dust point of view.
62. In these circumstances, I consider that as with noise, dust as an amenity impact, within set and controllable parameters (including no material change to the intensity of the use of the site) would not be overriding, especially given again available and required updated controls through the existing EA Permit. The proposed scheme therefore accords in my opinion with the dust control element of KWLP Policy W18.

#### *Odour*

63. The applicant's odour impact assessment study has followed the same approach as its companion noise and dust reports. It has taken note of prevailing wind direction and account of all other relevant variables in relation to residential vulnerability and available site controls and management. The report concludes that odour from decomposition of (or receipt of part-decomposed) minor quantities of putrescible waste entering the site is the potential amenity point at issue here.
64. To place the issue in context, Members should be informed that odour control and mitigation measures, particularly with the potential for harm to any residential interests would continue to be of focussed concern within the existing and any required updated EA Site Permit. A standard control within that régime is that any odorous waste inputs to the site should be removed within 48 hours from their arrival. This in addition to good practice measures such as containment of surface waste water drainage would seem to suffice for safeguarding purposes. Indeed, Jacobs (Odour) state that if the 48 hour rule is adhered to there would be *'little opportunity for any materials to initiate decomposition such that they could result in emissions of odour from the site'*. The spreading of waste materials over a greater area of the site would also in their opinion have no appreciable effect on any potential odour generation, perhaps even a reduction in such potential.
65. In these circumstances, I consider that as with noise and dust, odour too is a potential amenity impact capable of being controlled within acceptable levels by the individual and combined effects of planning and EA Permitting conditions. I do not consider therefore that this amenity aspect is overriding and meets in my view the odour safeguarding requirements of KWLP Policy W18.

#### *Traffic*

66. Some residents of Braeburn Park have entered objections over potential increases in traffic related movements from the proposed development.
67. As stressed in paragraph (20), there would be no increase in the measurable intensity of the use of the site (apart from the positive increase in waste separation rates). The same hours of operation, waste input types and level of throughput and traffic movements, both in and out, would remain. Consequently, there would be no material change to the

potential highway capacity or amenity impact issues (noise, dust, odour and vibration) already associated with the current and proposed continuing level of site traffic. In those respects, I consider that the proposed development accords with the traffic-related safeguarding objectives of KWLP Policies W18 (amenity controls) and W22 (traffic impacts).

## **Conclusion**

68. In conclusion, I consider that the overall objective of the proposed development is worthy of support. The displacement of skip storage and vehicle parking to make way for a Trommel and picking station presents some organisational and control issues on a relatively small, sloping and elevated site. The revised arrangement however does offer an effective doubling of waste separation and recycling rates at the site. New sustainability credentials of that calibre are very much in line with Government guidance and the Development Plan.

69. Amenity impact concerns have been received from the residents of Braeburn Park and in their support, from Bexley Borough Council. Placing these in context, Members should note that the proposed operational changes to the site would be internal. There would be no change to the waste stream handled at the site, nor any increase in hours of operation, throughput or traffic movements. The proposed scheme in my view would involve no new overriding amenity impacts by virtue of visual intrusion, noise, dust, odour or related traffic-induced disturbance and emissions. The technical amenity studies submitted by the applicant have been vetted by the relevant sections of Jacobs and no planning objection has been raised, subject to mitigation measures being followed.

70. On balance, I conclude that given the sustainability benefits of the proposed development, the containable nature of any potential amenity impacts and available planning and EA Permitting controls, that the scheme is in overall accordance with the Development Plan and should therefore be granted planning permission, subject to conditions.

## **Recommendation**

71. I RECOMMEND that PERMISSION BE GRANTED SUBJECT TO conditions including amongst others those to cover the following aspects:

- Development to be carried out within 5 years.
- Development to be carried out in accordance with the scheme as submitted and any subsequently approved details, including a single site access (with reserved emergency access) and the footprint of the proposed waste stockpiles on site.
- Restriction of waste types, hours of operation, throughput and traffic movements to the level of those already permitted at the site.
- The Trommel and picking station shall be of a fixed specification and location within 1 metre of the northern site boundary.
- Stockpile heights shall be no greater than the boundary fencing and below the visible eye-line.
- Operational safeguarding measures to control noise, dust, odour, related emissions, surface run-off and drainage, light pollution and mud and debris on the road. Such measures to include transitional arrangements (without undue amenity impacts) for the re-location of skip storage and vehicle parking within the 'extension' area, in



favour of active waste management within the same footprint.

- Remediation measures to handle any unsuspected site contamination issues that may arise during the carrying out of the development.

72. In addition, an informative to the applicant to confirm that whilst planning and EA Permitting controls are designed to be complementary in these types of waste management settings, planning controls always preside.

Case Officer: Sav Patel
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Background Documents: see section heading.
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