



ECONOMY AND PLANNING SERVICES

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Our Ref: CR/2019/0378/CON
Email: development.control@crawley.gov.uk
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West Sussex County Council
County Planning
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FAO James Neave

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990
PROPOSAL: CONSULATION FROM WEST SUSSEX COUNTY COUNCIL (WSCC/041/19) FOR A PROPOSED CONCRETE CRUSHING AND SOIL RECYCLING FACILITY
LOCATION: KILMARNOCK FARM, CHARLWOOD ROAD, HORSHAM

I refer to the above consultation received on 10 May 2017 and would advise you that the Council raises an **OBJECTION**.

The applicant is seeking to gain planning permission for a concrete crushing and soil recycling facility. It would be used by PJ Brown Construction to process and store waste from their operations across West Sussex prior to reuse. The company is currently using other sites in West Sussex to process waste although these locations are not stated. The application states that a maximum of 75,000 tonnes of waste material would be processed annually on site generating up to 30 inbound and 30 outbound heavy goods vehicle (HGV) movements per day. The PJ Brown Construction depot where their HGVs are stored at the end of each day is located 1km further north along Charlwood Road. The submitted Planning Statement states a figure of 15 movements in and 15 out per day for the depot site.

The site itself would include a new entrance where there is currently a field gate onto Charlwood Road. The south of the site would include the entrance from Charlwood Road, landscaping and 2x detention/balancing ponds. A 4.5m acoustic barrier and 3.5m gate would separate this area from the rest of the site. North of this would be 6 car parking spaces for staff, a steel shipping container as an office/tea room/WC, and further north a treatment plant for soil waste water, wheel bath, stock bays for processed material and stock piles for unprocessed material. The concrete crusher would be located at the north end of the site. The boundary of the entire the site (with exception of the site entrance area) would be a 4.5m high class 3 acoustic barrier

The application site is approximately 0.8ha in size located within the countryside approximately 0.6 kilometres outside the Crawley Borough Boundary and would be closest to the residential neighbourhoods of Ifield and Langley Green. The closest uses within the Borough boundary to the site are Crawley Rugby Club, Bowls Club, The Gables Care Home and residential properties lying approximately 600- 750m away. It is important to assess whether the proposed operation and associated traffic would have a direct impact upon the character of the countryside, the visual amenities and enjoyment of the countryside and the amenities of residents.



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The WSCC Waste Local Plan identifies a need for recycling facilities and identifies sites to meet this need. This site is not one of those identified but is within the area of search as defined on the Waste Local Plan Key Diagram. The site is described as an extension of the existing site to the north and the proposal is for 75,000tpa of waste a year to be processed. This would be a significant amount and is not "small scale" as defined in the Waste Local Plan which would be considered at <50,000tpa. Consideration should be given to the impact on the character and visual amenities of the countryside location. The site is located within a rural area designated as the Upper Mole Farmlands Landscape Character Area which stretches across both Horsham and Crawley. The Crawley Green infrastructure SPD that expands on Local Plan Policy CH9: Development Outside the Built-Up Area; states that the landscape condition is considered to be declining in this area due to increasing visual/noise intrusion in some parts with key issues being traffic eroding road verges and hedgebanks and the visual impact of industrial uses and buildings. Planning guidelines for this area state that *Incremental development should be resisted to prevent the actual and perceived reduction in the highly valued open character of this area.*

The whole proposed site is not 'small scale' contrasting with the existing small scale commercial/leisure uses on the site and would have tall 4.5m boundary fences, large plant and significant quantities of stored waste material in relation to the existing built form on the site and in the context of the area. It is therefore considered that it would be a significant intrusion into the countryside with a harmful impact upon visual amenity and landscape character. It would also constitute a significant activity of an industrial type of character in this valued countryside location, with noise, lighting, extensive HGV and other vehicle movements and associated activity that would be contrary to both Crawley Local Plan Policy CH9: Development Outside the Built-Up Area and the Green Infrastructure SPD that seeks to protect the landscape character of this wider landscape area surrounding Crawley and extends into Horsham District.

In addition to the development of the site itself, the associated traffic movements through Crawley are also a concern. The application states that the proposed facility is likely to generate 60 two way HGV movements across the average day. The design and access statement states that Charlwood Road can be considered a suitable route for the proposed number of HGV movements on the basis that the majority of those vehicles already have to pass through the residential neighbourhoods of Ifield and Langley Green to access the existing depot to the north. The Planning Statement states that there are on average 15 inbound and 15 outbound HGV movements per day at the depot. However, PJ Browns' website states that they operate a fleet of 50 lorries/trucks and aerial photos show approximately 50 HGVs parked at the depot which suggests the 15 in/out figure is highly unlikely to be accurate. Combined with 30 inbound and 30 outbound HGV movements per day at the proposed facility this would clearly be a significant number of HGV movements along Charlwood Road. The traffic routes proposed are set out in fig 3.2 of the Transport Statement and it is proposed that all of the local and strategic lorry routes are accessed from the site via Charlwood Road/Ifield Avenue, a C category road which runs immediately adjacent to and between the residential neighbourhoods of Ifield and Langley Green. Charlwood Road is a single carriageway serving a rural area and it is considered that the traffic movements proposed are likely to create an unacceptable level of activity eroding road verges and hedgebanks in a countryside location and also impacting minor residential roads within the urban area of Crawley. There is also concern that the proposed increase in the existing number of HGV movements along this stretch of road may cause highway safety and/or traffic issues. This is an issue for WSCC as the Highway Authority to comment on.

The site is also located within the area safeguarded for a second runway at Gatwick should it be required by national policy. The original requirement to safeguard land for a second runway at Gatwick was contained in the 2003 Aviation White Paper. The Aviation Policy Framework (March 2013) clarified the position in paragraph 5.9 with regards to safeguarding in that land surrounding existing airports should be protected against incompatible development which may be required to meet future airport needs. The land shown as safeguarded for a second runway is shown within the 2012 Gatwick Airport Master Plan, which is based on the need to cater for a wide spaced parallel runway as required by the 2003 Aviation White Paper. The recent consultation on the forthcoming national Aviation Strategy (Dec-


June 2019) stated that *“It is prudent to continue with a safeguarding policy to maintain a supply of land for future national requirements and to ensure that inappropriate developments do not hinder sustainable aviation growth” (para3.66)*. Crawley Local Plan Policy GAT2: Safeguarded Land reflects this requirement to safeguard the land stating that only *“minor development within this area, such as changes of use and small scale building works such as residential extensions will normally be acceptable”*.

The development does not constitute minor development, such as changes of use and small scale building works, such as residential extensions. The development would therefore be considered to be of a scale that would add to the complexity of delivering an additional wide spaced runway at Gatwick Airport (If required by national policy) and this would be contrary to safeguarding policy in this area that is set out in National Aviation Policy and reflected in Policy GAT2 of the Crawley Borough Local Plan.

It is therefore considered that the proposal is in an inappropriate location where the impacts on the character and visual amenities of the countryside from scale of development and waste storage on site, the site activities and HGV movements contrary to policy CH9 of the Crawley Borough Local Plan 2015-2030. There are likely to be increased impacts on the residential amenity from increased HGV traffic on minor urban roads within Crawley conflicting with Policy CH3 of the Local plan. The area currently remains safeguarded for a potential second runway at Gatwick Airport site, would not be “minor development” and would clearly add to the complexities and cost of providing a second runway at Gatwick Airport if required by National Aviation policy in the future. The proposal is therefore contrary to national policy and that of Crawley Local Plan Policy GAT2 which should equally apply here.

If you have any queries on this response, please contact Tom Nutt on 01293 438017 or by email at the above address.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Clem Smith', written in a cursive style.

Clem Smith
Head of Economy and Planning Services