



# PLANNING STATEMENT

ON BEHALF OF

**PJ Brown Construction**

## **Proposed Soil Recycling and Concrete Crushing Facility at, Kilmarnock Farm Ifield Road Charlwood RH11 0JY**

**May 2019**

**Our Ref: J002999**

WS Planning & Architecture, Europe House, Bancroft Road, Reigate, Surrey, RH2 7RP

T: + 44 (0)1737 225 711 F: + 44 (0)1737 226 311 [admin@wspa.co.uk](mailto:admin@wspa.co.uk) [wspa.co.uk](http://wspa.co.uk)

Reg Office: Europe House, Bancroft Road, Reigate, Surrey, RH2 7RP Company No. GB3763487 WS Planning & Architecture is a trading name of Woods, Sanders & Co Ltd

Managing Director: Mr B Woods BA TP MRTPI Planning Director: Mr S Copping BA (Hons) DipTP MRTPI Architectural Director: Mr L Barker BA(Hons) BArch (Hons) RIBA

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## 1.0 **INTRODUCTION**

- 1.1 WS Planning & Architecture have been instructed by PJ Brown Construction Ltd to prepare a Planning Statement in support of a full planning application for a Proposed Soil Recycling and Concrete Crushing Facility at Kilmarnock Farm Ifield Road Charlwood RH11 0JY.
- 1.2 This planning statement will demonstrate how this proposed site outweighs other sites and how it would adhere to the criteria determined by planning policy and guidance.
- 1.3 The primary objectives of this Planning Statement are to demonstrate that:
  - There is a lack of potential sites
  - The proposed site is a Brownfield site

## 2.0 **APPLICATION SITE AND SURROUNDING AREA**

- 2.1 Kilmarnock Farm Ifield Road Charlwood RH11 0JY, is situated on the northern side of the Charlwood Road that leads to Charlwood village to the north and Crawley to the south. The site is not within an area designated for its ecological, landscape or historic value. It is, however, beyond the 'built up area' defined in the Horsham District Local Development Framework, it is within the 'countryside', albeit some 600m west of its boundary with Crawley Borough. The site is also within the 'areas of search' identified in the West Sussex Waste Local Plan (2014). A previous inspector has identified that the site is in a sustainable location.
- 2.2 The application site comprises a building in the north eastern corner of the cluster of buildings on the farm. To the south of the application site are outbuildings used as storage for agricultural machinery and stables with a residential dwelling beyond. The application site comprises an area of approximately 0.0080 ha.

### 3.0 PLANNING POLICY CONTEXT

#### National Planning Policy Framework (NPPF) Feb 2019

3.1 The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

3.2 Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- **Economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **Social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and
- **Environmental objective** – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural

## 4.0 **PLANNING ASSESSMENT**

### **Proposal**

- 4.1 The proposed development would see PJ Brown Construction Ltd, employers of around 400 people locally, extend their existing operation to Kilmarnock Farm to create a soil recycling and concrete crushing facility at the site. Kilmarnock Farm is located only 0.6 miles further South along Charlwood Road from their current depot where the lorries return at the end of each day.
- 4.2 Access to the site is proposed from the gated access that currently serves the southernmost field and would be directly from Charlwood Road. Planting will be proposed along the western boundary running adjacent with the public footpath to soften any visual appearance of the development. The existing site is visible at a distance from the whole length of the footpath. The proposed development is to be located within the western half of the site and using the existing volume of buildings and hardstanding as a guide for the proposed use. The existing volume of buildings and mobile homes for this part of the site have been measured as being 1309.34 cubic metres and with a footprint of 410.17 square metres. 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 existing Kilmarnock Farm site generates around 57 peak hour movements on a typical weekday, with 21 of these arising in the morning peak hour and 36 in the evening peak hour. Current activities on site will cease upon opening of the new PJ Brown facility, therefore these 57 peak hour vehicular movements will be removed.

- 4.3 As the proposed facility is likely to generate 60 two-way movements across an average day and the current site usage generates 57 in just the peak hours (08:00-09:00 and 17:00-18:00) it is likely that the proposed PJ Brown recycling facility will result in a decrease in overall vehicle movements at the site.
- 4.4 This development is a direct replacement from their previous facility at Holmbush Farm. Holmbush Farm and the surrounding land is being developed as Kilnwood Vale, a new residential development of circa 2,500 homes by Crest Nicholson. In order to continue providing the construction industry with Secondary Aggregates and to help meet the needs of the Waste Local Plan, the recycling facility operated by PJ Brown (Construction) Ltd needs to relocate to a permanent location. Currently they are having to use other sites to deposit this waste and a facility of their own would be of great benefit not just to them, but also the environment. Therefore, in this regard, the application is considered to accord with the relevant waste guidance and development plan policies.
- 4.5 Our Clients have also indicated that by having a crushing and screening facility in house would mean no initial tip fees plus it is more cost effective when clearing the surplus soils in a sustainable location.
- 4.6 Kilmarnock Farm is currently in a range of uses including light industrial and storage uses, and stables. There are currently mobile homes on the site itself, and a dwelling at the front of the site, fronting Charlwood Road.
- 4.7 As seen in the Design and Access statement that accompanies this application, Kilmarnock farm has a vast planning history which constitutes it falling under previous developed land and therefore it is considered to be a 'Brownfield' site.

## 5.0 ALTERNATIVE SITES

### Considerations

#### **Location**

- 5.1 The current PJ Brown market area for recycling soil and aggregates business is centred in Horsham and Crawley; which provide the majority of the business of the raw materials and market for the product. Providing the applicant with a site 0.6 miles from their existing operation, which can be used instead of sending vehicles around the County and beyond to different sites daily. This would greatly reduce their carbon footprint and help mitigate against climate change.
- 5.2 The M23 which is a strategic lorry route, does facilitate operating north to Reigate and into southern fringes of London, however, inevitably there would be stiffening competition from London operators and from along the M25.
- 5.3 Kilmarnock farm is located near several other business/commercial uses along Charlwood Road and in the general vicinity that include hotels and kennels. Looking at vicinities of the 5 allocated sites, it should be noted that all 5 sites are located near residential area, some much closer than Kilmarnock farm.



## Environmental Constraints

5.4 It is nature of soil and aggregate recycling to involve the potential for dust and noise from crushing and screening operations, the loose plant and haulage vehicles used to load and transport materials to, from and within the site. When seeking and comparing potential sites for such operations the proximity to sensitive locations or site occupiers and the ability to protect them from direct impact or nuisance must be a major consideration. Sensitive locations include, residential property, schools, hospitals, nature conservation designations, water environments and archaeology. The dominate wind blows from the SW to NE, the proposed location of the storage bays, along with a 4 metre acoustic barrier around the site, and other buildings located on the site will act as a wind block reducing the amount of dust carry.

## Local Highway infrastructure

5.5 The size and condition of the local highway network in the immediate vicinity of a potential site and specifically the route to the primary network is a relevant consideration. Kilmarnock farm as previously mentioned is 0.6 miles from there current depot where the lorries go to at the end of the day. **“The Inspector in relation to an appeal against refusal of the use of Kilmarnock Farm for car valeting (ref. APP/Z3825/W/15/3004320). In this case the Inspector noted that the site has ‘easy access to the strategic road network around Crawley and the M23’**

## Highway Safety

5.6 PJ Brown has operated HGVs from their Burlands Farm yard for 25 years. Using a conservative figure of 15 movements in and 15 out per day. Between 1999 and 2012, PJ Brown carried out three phases of intensive soil importation to Kilmarnock Farm in Charwood Road, using the

applicant's tipper truck. There was not a single incident, accident or complaint to the best of the Applicant's knowledge.

5.7 Looking at the specifically allocated sites Policy W10: Location of these sites can be seen in **Appendix 1**.

- **Site north of Wastewater Treatment Works, Ford:** This is located too far south to be a viable location.
- **Hobbs Barn, near Climping:** this site is also situated too far south to be considered a viable option.
- **Fuel Depot, Bognor Road, Chichester:** This site is not central to area of operations, it is also understood to have been purchased by Britannia Crest Recycling for skip recycling.
- **Brookhurst Wood, near Horsham** - Biffa's flagship Mechanical & Biological Treatment Facility has been built at Brookhurst.
- **Land west of Wastewater Treatment Works, Goddards Green** – This is a Greenfield site, it adjoins the existing water waste treatment works. It is within close proximity to an SNCI and ancient woodland, the potential for flooding could potentially cause issues.

5.8 The sites allocated in Policy W10(a) are all located in the Areas of Search close to where the waste arises; they are outside the protected landscapes; and they have good access to the Lorry Route Network. They are, therefore, distributed in accordance with the spatial strategy. However, currently out of the 5 allocated sites, three of them are in the south of the borough, with them being in relatively close proximity to one another. There are two allocated sites in the rest of the borough.

- 5.9 Whilst in the waste local plan it states, “**the allocated sites would be able to meet the theoretical capacity shortfall of 0.68mtpa, without any reliance on unallocated sites.**” With waste production and the need for recycling for ever increasing, Kilmarnock Farm is a potential site that allowing for a degree of contingency.

### **Additional Sites**

- 5.10 **Nowhurst Business Centre (Horsham)** – this was initially described in the Waste local Plan 2012 update as a 6.5Ha site with the potential for a “commercial built waste facility” however, there are residential properties in close proximity as well as a school close to the access of the site. The Site is currently available for B1(c), B2 and B8 developments, there is an outline application awaiting decision but recommended for approval for the for the development of up to 26,942 sq m (gross internal area) for B1c (industrial processes), B2 (general industrial) and B8 (storage and distribution) employment uses (DC/17/2131).
- 5.11 **Broadbridge Farm (Horsham)** – Broadbridge farm is located to the east of the town of Ashington. The site is a 2.5Ha greenfield site adjacent to an operation al sewage treatment works. There is an Ancient woodland and the South Down National Park to the South and an SNCI to the north. There are also ponds and a tributary of the river Adur at the southern edge of the site which is subject to flooding (Flood Zone 3).

## 6.0 **CONCLUSION**

- 6.1 This has demonstrated that in comparison to the allocated sites under policy W10 and other potential sites identified, Kilmarnock farm is the most suitable for use as a soil recycling and concrete crushing facility. The proposal complies with the strategic objective of reducing carbon and climate change within the County. Kilmarnock Farm can clearly be considered as a brownfield site and is within one of the areas of search so demonstrates policy compliance with these key considerations.

## 7.0 **APPENDICES**

Appendix 1 – Site Allocation Key Diagram

# APPENDIX 1

