

Committee: **Regulatory  
Planning Committee**

Date: **16 December 2020**

Report by: **Director of Communities, Economy and Transport**

Proposal: **Reconfiguration of site layout including: extension to yard; installation of vertical silo; installation of weighbridge; erection of storage building; operation of concrete crusher; new lighting scheme; new drainage infrastructure; full conversion of Brownings to office and HMO accommodation.**

Site Address: **Woodside Depot, Hailsham Road, Polegate, BN27 3PG**

Applicant: **Mr James Bailey, Hailsham Roadway Construction Co. Ltd**

Application No. **WD/843/CM**

Key Issues: **(i) Sustainable management of waste  
(ii) Effect on amenity  
(iii) Access  
(iv) Ecological considerations  
(v) Trees  
(vi) Drainage  
(vii) Use of Brownings property**

Contact Officer: **Jeremy Patterson - Tel: 01273 481626**

Local Members: **Councillors Gerard Fox and Stephen Shing**

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## **SUMMARY OF RECOMMENDATIONS**

**1. To grant planning permission subject to conditions as indicated in paragraph 8.1 of this report.**

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## **CONSIDERATION BY DIRECTOR OF COMMUNITIES, ECONOMY AND TRANSPORT**

### **1. The Site And Surroundings**

1.1 The application site is 2.65 hectares in area and comprises an existing depot / open yard and a former residential property, 'Brownings', which adjoins the south-western side of the yard. The depot includes two main buildings used

as a workshop and a store. Office and welfare facilities adjoin Brownings on its north-eastern side, and the property itself also includes office and residential accommodation associated with the business. The western part of the open yard is principally laid to tarmac and concrete, whereas the eastern part comprises hardstanding. The northern and eastern boundaries of the depot benefit from well-established vegetated screening bunds and mature trees line the southern and western boundaries adjoining Summerhill Lane and the A22, respectively. A Tree Preservation Order (TPO) (Hailsham, No. 25, 1990) identifies individual trees and groups of trees within the Brownings property. Access to the depot is directly from the A22, whereas Brownings is accessed from Summerhill Lane.

1.2 Land adjacent to the north, east and south of the site is in agricultural (grazing) use, as well as land beyond the A22 to the west. A large solar farm is also present to the west of the A22 and a chicken farm is located immediately to its south and includes six large barns. A vehicle repair workshop is present between the solar farm and the A22 about 100 metres west of the site. A former quarry known as Polegate Yard is used for waste management purposes and is located some 250 metres to the south-east of the site. The Amazon Wood Fishery adjoins the Polegate Yard site to the south-east and manages several ponds. Cophall Wood Recycling Centre is located about 400 metres to the south-west of the site on the opposite side of the A22.

1.3 There are no large residential settlements in close proximity to the site. However, residential properties are situated about 150 metres to the south-west and 250 metres north-west of the site on the opposite side of the A22. There are also properties 175 metres to the north, 200 metres to the south and 300 metres to the east of the site (the latter including two listed buildings at 'Coppards'). Five houses are located to the north-east of the site at the junction of Summerhill Lane and Coldthorn Lane. The southern edge of Hailsham is about 1.2 kilometres to the north. A footpath tracks to the south-east opposite the Brownings' access and other footpaths track eastwards from Summerhill Lane to the east of the site and over agricultural land to the north.

## **2. Site History**

2.1 Wealden District Council has previously dealt with planning applications at the site, which show that it has been used for highway contracting works for over 40 years and waste operations for nearly 30 years.

2.2 A highways depot had been present at the site from at least the 1970s, with outline planning permission granted (ref. WD/1980/00250/O) for its extension in 1980. This included provision for a building to house highway maintenance vehicles and equipment for repair works. Planning permission WD/1991/1856/F for the continued use of the site as a highway depot was approved in 1991, which included a new temporary recyclable material collection and transfer station. Planning permission WD/2002/2281/F was approved for the conversion of garages and potting sheds and extensions to create offices at the site in 2002. These offices are located immediately to the

north of Brownings and increased the site area to include additional land to the south-west.

2.3 Planning permission WD/2001/2546/F was granted in 2004 for the construction of a new site building. The building was to be used for the storage of material including cement but was not erected. The permission also allowed for mechanical grading / screening treatment activity and included additional land to the south-east. Condition 24 of this permission required the submission of details of the precise type and siting of all plant and machinery and they were submitted with planning application reference WD/2005/1570/F (granted in 2006), which included a cement silo and fuel container. The installation of the silo marked the start of concrete production at the site and the site currently produces a range of cement bound and coated highways construction materials using the co-located recycled materials and primary aggregates. The details showing the type and siting of all plant and machinery also included a crusher and grader.

### **3. The Proposal**

3.1 The proposal is for an improvement and extension to the existing highways management and waste processing facility, including using the Brownings property as a house of multiple occupation (HMO). To more easily understand what is being proposed, it is important to describe the current activities, as follows: (i) The importation, processing, storing and transfer of waste and primary aggregates and soils for sale and internal use; (ii) The treatment of soils for re-use as engineering grade materials through the use of batching plants and associated equipment; (iii) Concrete batching and roadstone coating with both primary and recycled materials using one fixed batching plant and four mobile plants and two silos; (iv) Storage and sale of mineral products and building materials (e.g. kerb stones, slabs, drainage materials); (v) Storage for highways contracting purposes; (vi) Parking for a range of vehicles; (vii) Maintenance facilities for plant, vehicles and equipment; and (viii) Staff welfare facilities, office and training accommodation, residential accommodation in Brownings and materials research, development and testing laboratory.

3.2 The proposals will continue to provide 90 jobs at the site by seeking to maintain the dual role of the site as a highway contracting depot and waste management facility as set out above but to incorporate some modifications to be able to deliver operational efficiencies and environmental benefits. These will involve: (i) The construction of a storage barn (24m x 9m x 7m high) to ensure soils and other mineral products produced on site are unaffected by weather so that less material would be sent to landfill (which could be used instead in innovative ways, such as in the re-use and recycling of soils, tar-based road planings and other construction/highways waste); (ii) The installation of a weighbridge; (iii) Increase recycling and local supply of mineral products by re-locating the contracting business through the extension of the yard into part of the former garden of Brownings. This would provide additional capacity for material storage and processing in the existing yard area; (iv) Improvement to site drainage including delivering new storm water attenuation

capacity, featuring a swale and open drainage pond, and enhancements to the current oil interception capability and installation of a modern foul treatment plant; (v) A new lighting system; (vi) Full conversion of Brownings involving office, training and welfare facilities on the ground floor and HMO living accommodation on the upper floors; (vii) The regularisation of the recently installed (in August 2019) mobile silo and batching plant as permanent structures to allow for the enhanced treatment of wastes; (viii) The use of crushing equipment on site for longer than under permitted development (PD) rights; and (ix) The consolidation of existing uses and activities into one up-to-date planning permission.

3.3 The site currently operates up to 24 hours a day, 365 days of the year, which the applicant states as being necessary to be able to deliver the highways contracting operations, which often take place during the night. The ability to be able to work continuously appears to have evolved following the site being used as a highways depot from the 1970s. However, no processing of waste takes place at night and that would continue to remain the case under the proposals. During the night-time, the site would remain open for the collection of plant and materials and the deposit of waste collected from highway works. The core operations are proposed between the hours of 06.00 and 18.00 Mondays to Saturdays with occasional working on Sundays and Bank Holidays. However, in terms of using plant and machinery, the applicant proposes the following working hours: (1) Crushing and screening: 07.00 – 18.00 Mondays to Fridays and 07.00 – 13.00 Saturdays with no working on Sundays, Bank and Public Holidays; (2) Recycling (Batching) Plant: 06.00 – 18.00 Mondays to Fridays and 06.00 – 13.00 Saturdays with no working on Sundays, Public and Bank Holidays; and (3) Recycling (Batching) Plant night-time operations: 18.00 – 06.00 Mondays to Saturdays with no working on Sundays, Public and Bank Holidays, up to 36 times per year (with the plant typically being used only for a few hours each night).

3.4 The proposal has been screened under the Environmental Impact Assessment (EIA) Regulations (2017) to determine whether an EIA would be required. Although it was considered that there would be environmental effects, these were not considered to be significant within the meaning of the Regulations and therefore an EIA has not been required.

3.5 The proposal has also been considered in relation to The Conservation of Habitats and Species Regulations 2017 (or the 'Habitats Regulations'). The nearest site which is designated under these Regulations to the application site is the Pevensey Levels Special Area of Conservation (SAC) and Ramsar site. Further afield and to the north of the application site lies the Ashdown Forest SAC and Special Protection Area (SPA). The proposal is not directly connected with, or necessary to the management of either the Ashdown Forest SAC and SPA, or the Pevensey Levels. Nevertheless, it is still necessary to consider whether the proposal is likely to have a significant effect on the interest features of the designated sites, alone or in combination.

3.6 Due to the nature of the proposal, its location and the interest features of the Pevensey Levels SAC and Ramsar site, there is considered to be no

significant effect from the proposal on the Pevensey Levels. In addition, due to the distance of the site to the Ashdown Forest, as well as its proposed use, it is considered that the proposal will not give rise to any recreational or air quality impact upon the Ashdown Forest, which could be deemed to undermine its SPA and SAC designations. Consequently, the proposal is not likely to result in an impact, either alone or in combination, on the nearest Habitats Regulations designated sites and the need for any further assessment can therefore be screened out.

#### **4. Consultations and Representations**

4.1 Wealden District Council raises no objections, although notes that the EHO considers that the submitted noise assessment is insufficient to enable a detailed assessment on whether there would be a resulting impact of the proposal on the amenities of neighbouring and future occupiers. Therefore, the County Council should be satisfied that effects to amenity can be adequately controlled.

The Environmental Health Officer (EHO) raises concerns regarding noise emissions. However, it is recommended that monitoring should take place to make sure that approved noise levels are being complied with and that the hours of operation are limited to 08.00 – 18.00 Mondays to Fridays, 08.00 – 13.00 on Saturdays and that night-time operations are limited to a maximum of 3 days per calendar month.

The Housing and Property Services Department noted that, should permission be granted, the applicant will need to ensure that an application is made for a mandatory HMO licence for the premises. An assessment of suitability for occupation of the HMO in relation to the Council's prescribed standards and relevant legislation would then take place.

4.2 Hailsham Town Council raises objections on the grounds that the proposal would be detrimental to the environment, wildlife and neighbouring residents with the dust and noise pollution that will be created. There would also be a detrimental effect to the health and well-being of residents. The lighting changes will result in light pollution with a detrimental effect on residents and wildlife. There is concern regarding runoff from the site and the increase in heavy vehicles and traffic adding to pollution in the area and onto a dangerous stretch of the A22.

4.3 Polegate Town Council submitted comments and questions, including on the expansion of the site, noise and dust, the use of a concrete crusher and the effects on people and land, the use of the HMO, road safety on the A22 and the height of the silo.

4.4 The Environment Agency raises no objections.

4.5 Flood Risk Management ESCC raises no objections and recommends conditions, including the submission of details for a surface water drainage system, a maintenance and management plan for the drainage system, the

control of drainage during construction and evidence that the drainage system has been constructed in accordance with the approved details.

4.6 The Highway Authority raises concerns regarding the increased use of the Brownings' access onto Summerhill Lane by residents of the proposed HMO accommodation. Consequently, it recommends that conditions should be included regarding the improvement to visibility from the access onto the Lane and increasing the width of the access so that two cars can pass simultaneously.

4.7 Local representations: 33 representations have been received from local residents and other third parties, of which 24 make objections and 9 offer support. Six households, which have objected, have submitted more than one representation and one household has also had representations submitted on its behalf by a consultant and a noise assessment undertaken to support its objection.

The objections can be summarised as follows: (i) Noise from the crusher downwind of the prevailing wind direction and effect on amenity; (ii) Effect of dust downwind on land, including orchards and gardens, and on amenity. Effect of cement and silica dust on amenity and health; (iii) Unsafe nature of the height of waste stockpiles; (iv) The change of use of Brownings from a residential property to offices and HMO; (v) Undefined hours of crusher use; (vi) Increase in traffic using Summerhill Lane, Coldthorn Lane and A22; (vii) Effect on health and well-being; (viii) Effect on wildlife and ecology; (ix) Increase in pollution, including from light pollution; (x) Effects on the users of the public rights of way in the locality; (xi) Pollution through drainage; (xii) Increase in traffic from the HMO use; and (xiii) An Environmental Impact Assessment should have been carried out.

The representations of support can be summarised as follows: (i) The living accommodation has been beneficial for use by people facing difficult circumstances; (ii) Businesses involved in groundworks, including for housebuilding, value the activities undertaken at the site; (iii) The Service Director for East Sussex Highways considers the applicant is a key and valued supplier of materials; (iv) The applicant has engaged positively with the ESCC funded 'Scale Up East Sussex: Built Environment Economic Development Programme'; and (v) The ESCC Primary Careers Hub (which works with a range of local businesses to support careers related learning in primary schools across the county) notes that the applicant has played a significant role in terms of raising aspirations and broadening horizons for young people and is recognised as an 'Industry Champion'.

These representations have been available to view on the Council's website since their submission and copies have also been sent directly to members of the Planning Committee.

**5. The Development Plan and other policies which are considered to be of relevance to this decision are:**

5.1 East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013: WMP3b (Turning waste into a resource); WMP6 (Safeguarding waste sites); WMP7a (Sustainable locations for waste development); WMP19 (Co-location of complementary facilities); WMP22 (Increased operational capacity within the site boundary of existing waste facilities); WMP23a (Design principles for built and minerals waste facilities); WMP23b (Operation of sites); WMP24a (Climate change); WMP25 (General amenity); WMP26 (Traffic impacts); WMP27 (Environment and environmental enhancement); WMP28a (Flood risk).

5.2 East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan 2017: Policies: SP4 (Physical extensions of existing waste sites); SP6 (Safeguarding waste sites); Map 18 SP-E/B Woodside Depot, A22.

5.3 Wealden District Local Plan 1998: Saved policies: EN12 (Trees); EN14 (Landscaping); EN27 (Layout and design of development); EN29 (Light pollution); TR3 (Traffic impact of new development).

5.4 Wealden District Core Strategy Local Plan 2013: Policy WCS12 (Biodiversity).

5.5 National Planning Policy Framework (NPPF) 2019

The NPPF sets out the Government's planning policies for England and how they should be applied. Planning law requires that applications for planning permission be determined in accordance with the Development Plan, unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions. Parts 6 (Building a strong, competitive economy), 12 (Achieving well-designed places), 14 (Climate change) and 15 (Conserving and enhancing the natural environment) are relevant in this case.

5.6 Development Plan documents which are not considered to be of relevance to this decision are: Hailsham Neighbourhood Plan, Referendum Version, March 2020 (an emerging plan following examination, but still subject to a referendum before adoption). While Section 70 (2) of the Town and Country Planning Act 1990 (as amended) provides that a local planning authority must have regard to a part examination draft neighbourhood plan, so far as it is material to the application, it is considered that the draft policies within the Hailsham Neighbourhood Plan are not of relevance to this application.

## **6. Considerations**

### **Sustainable management of waste**

6.1 The Waste and Minerals Plan is supportive, in principle, of developments on sites for the management of waste in Areas of Focus, as set out in Policy WMP7a, as such areas are considered to offer the best opportunities for the development of waste recycling and recovery facilities and where the greatest sustainability benefits are likely to be achieved. Woodside Depot is such a site, which, apart from being involved in the importation, storage and processing of

construction wastes, is also engaged in using these wastes to create alternative commodities, which can then be incorporated into building products within the construction industry. The proposal seeks to continue the complementary waste management and highway contracting uses at the site, while extending the operating area and improving facilities. Key components of these improvements are to provide clearer separation between contracting operations and waste processing activities and to enhance the provisions relating to the management of waste.

6.2 The site currently offers a 'one-stop shop' for the local circular economy involved with the re-use, supply and production of construction materials. Highways and construction waste can be deposited for later re-use and recycling, while at the same time, recycled materials, concrete or primary aggregates can be collected. The site benefits from having co-located activities, which are integrated to manage waste and produce products from soil to concrete. This delivers more sustainable outcomes in materials management, through encouraging re-use and recycling and reducing both the need for road transport and waste being sent to landfill. It also promotes and improves economic activity.

6.3 An important part of the drive to become more sustainable in waste processing operations is the applicant's approach to the treatment of imported materials, such as soils, which are segregated and stored by type. They are then processed through a screening plant, which removes stones and hardcore, which in turn are re-used in other products. The graded soil is then tested, further treated and re-used as different grades of engineering material in accordance with the WRAP Protocol (a system which allows for waste to become a non-waste product or allows for its re-use within the market without the need for waste regulation controls). During the winter months, due to the absence of a covered storage area and the effects of weathering, the soils have usually been sent to landfill. To address this, a new materials storage building is proposed.

6.4 In conjunction with the new building, a new silo and batching plant, which are already on site, would be able to turn waste clay, normally sent to landfill, into a useful construction material. This happens through a process of soil stabilisation, which involves altering the properties of soil by the forced action of mixing it with materials such as lime, cement and recycled binders, like flue ash. As a result, the clay's strength, durability, compressibility, hydraulic connectivity and swelling potential are all improved to levels acceptable for re-use in construction. As well as reducing the volume of this type of waste being sent to landfill, it would also result in a corresponding reduction in the need to import aggregate from outside the plan area. As this treated soil material can be used as an alternative to crushed concrete, it would free up supplies of crushed concrete locally to be used higher up the value chain in products such as fresh concrete and asphalt. This would have the dual benefit of reducing costs and offering large carbon dioxide (CO<sub>2</sub>) savings.

6.5 The applicant is aware of the need to change practices to reduce the carbon footprint of the business and to manage waste materials more

sustainably. In choosing materials or sub-contractors, for example, consideration is given to the environmental lifecycle of making such decisions, which includes calculating the carbon footprint and setting reduction targets. This is then documented in the Environmental Aspects and Impacts Register of the business and audited by the British Standards Institution as part of ISO 14001 accreditation (an internationally agreed standard that sets out the requirements for an environmental management system). A good example of this approach involves the treatment of road planings, which are imported and processed in accordance with the WRAP Protocol for re-use or recycling. The applicant has been successful in using this material to produce a cold asphalt, which saves 40% of CO<sub>2</sub> emissions, compared to the production of regular hot asphalt, while still performing strongly in engineering terms.

6.6 Overall, the proposal seeks to build upon the activities already undertaken at the site to use waste as an important resource, which can be treated and changed into engineering products of value, while reducing the need to source virgin material. As such, the applicant has demonstrated a commitment to managing waste sustainably, including reducing the generation of harmful greenhouse gas emissions, and is supported by Policies WMP3b and WMP24a of the Waste and Minerals Plan accordingly. Moreover, the Plan supports existing safeguarded sites (WMP6), the co-location of facilities with complementary uses (WMP19) and increased operational capacity within existing sites (WMP22), all of which apply to the proposed development.

### **Effect on amenity**

6.7 Although there are no close neighbours to the site, several residents in the locality have made representations objecting to the proposal on the grounds that their amenity would be adversely affected, principally in relation to noise and dust emissions but also in terms of visual effect, external lighting and traffic.

6.8 The site is regulated to reduce the effects of operations within the locality, not only through the extant planning permissions, but also through the extant Environmental Permit. Controls are also placed on the use of dust generating plant by the District Council. The business also polices itself through the ISO accreditation scheme. At sites which are subject to controls from multiple regulators, such as Woodside Depot, it is important that controls are not unduly duplicated, a matter which the government is keen to avoid. Indeed, Paragraph 183 of the NPPF states that 'the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes)'.

### **Dust**

6.9 Due to the potential for dust emissions being generated from the site, a Dust Impact Assessment has been submitted to accompany the application. In it, the assessment identifies potential receptors that could be affected, but due to the distance from the site and the mitigation measures employed to reduce emissions, the assessment considers that the risks are low. Such measures

would involve both infrastructural (e.g. existing screening bunds, push walls and bays) and operational (e.g. use of spray bars on plant and misting sprays on stockpiles and tracks) controls to prevent and manage dust emissions.

6.10 As dust is a pollutant of air, it falls under the scope of the Environmental Permit and the controls of the processes to be employed by the operator. The Environment Agency (EA) requires the operator to implement an Environmental Management Plan for the site, which includes dust management. The new batching plant and silo are already operated in accordance with a permit issued by the District Council, which also covers the grading/screening plant and cement silo associated with the mobile concrete plants. Moreover, the currently hired-in mobile concrete crusher comes with its own mobile plant permit and any new crusher at the site would be regulated by a permit from the District Council.

6.11 Although the submitted Dust Management Plan has been included as one of the approved documents under Condition 2 (subject to permission being granted), as it provides measures to control dust on a general basis, the key controls on dust generating plant and emissions are controlled - and would continue to be controlled - under consents from the EA and District Council. These are the appropriate bodies to regulate dust emissions from the site. Notwithstanding this, from a planning perspective, the proposed development is considered appropriate in this location, in respect of any impact from dust in the locality.

### Noise

6.12 In terms of noise, the proposal has generated concerns from residents in the locality on the increase in use of a concrete crusher at the site and night-time working, although it appears that no formal complaints have been received regarding operations at the site by either the County or District Councils on noise (except one made during the course of the current application to the District Council). A Noise Impact Assessment accompanies the application, which has been considered thoroughly by both the County and District Councils, and a separate noise assessment has been undertaken by a consultant on behalf of the occupiers of the 'Coppards' residential property to support their objection. As well as local authorities having responsibility to control noise, the EA also has a regulatory role under its Environmental Permit.

6.13 In assessing the effect of noise, a balance has to be made between the needs of the applicant and the benefits of the operations within the community as a whole and the potential effects on the amenities of persons living within the locality.

6.14 The potential for noise emissions and how they affect amenity is directly linked to the hours of operation. It is apparent that the existing hours of operation exceed those formally set out in the extant planning permission WD/01/2546. This permission appears not to take account of activities undertaken on highways contract work outside of core hours, specifically at night-time. However, if it is acknowledged that the site has a dual purpose for

highways contract work and waste management, as its planning history would indicate, it should be assumed that contract work could take place at any time. This appears to have been the assumption taken by operators, and regulators, since the 1970s when the site first hosted a depot.

6.15 The applicant proposes to be able to use a crusher/screener on the site between the hours of 07.00 – 18.00 on Mondays to Fridays and 07.00 – 13.00 on Saturdays. This does not mean that the plant would be used continuously, just that the applicant would be able to use it according to product demand rather than hiring-in plant to undertake works on a 'campaign' basis. This is considered to be acceptable, subject to Saturday working being restricted to the hours of 07.30 – 12.30 to accord with extant permission WD/01/2546. The use of the batching plant during the daytime should also follow the same hours of use. In relation to night-time, the use of the batching plant, which supplies concrete on demand, should be accepted in principle for up to 36 times per calendar year to reflect the nature of the business contributing to large highways contracting works in the county.

6.16 Despite the proposals being made in the context of existing uses at the site, the noise assessment does indicate that there is the potential for adverse effects, even with mitigation. The potential for noise emissions and how they might affect amenity is directly linked to the hours of operations. During the daytime, the submitted noise report has modelled a predicted rating level that may marginally exceed the background level at one of the six identified noise sensitive receptors during the day when the crusher is not operating and has modelled a rating level that will exceed the background level by between +1 dB to +7 dB at all six of the noise sensitive receptors when the crusher is operating, after the implementation of mitigation measures. Crushing and batching activities are predicted to result in levels which could be considered to be adverse, subject to context. Although context is relevant here as the site has been in operation for many years and is located next to a busy road, there is potential for adverse effects. Therefore, as well as a condition restricting daytime working for both crushing and batching plant activity (referred to above), a condition is also recommended for the rating level not to exceed the background noise level by +5 dB during the day at the sensitive receptors identified in the applicant's noise assessment. Although this level could result in some adverse effect to amenity, a balance needs to be made between the need for the activities and the potential effects on persons in the locality, particularly when considered in context, i.e. traffic noise from the A22 is likely to partly mask noise from the site.

6.17 During the night-time, the applicant's assessment has modelled a rating level that is predicted would exceed the background level by between +1 dB to +11 dB at all six of the noise sensitive receptors when the batching plant would be operating. Although the +11 dB above background is predicted at Natewood Farm to the west of the site, this does not account for the effects of the A22 and so the increase of +11 dB would be unlikely to be the level experienced at the property. Nevertheless, there would be an increase in levels and other properties would experience levels of +3 dB and +5 dB which could also be noticeable. Despite this, if the operator is to continue to be able to undertake

highway contract work at night, it will need to be accepted that some noise will be generated above the background noise levels, which might result in an adverse effect on residents. Therefore, it is recommended that a condition is included restricting the exceedance of background noise levels by +5 dB during the 36 times that the batching plant would be anticipated to operate at night.

### Visual effect

6.18 The site is in a countryside location but adjoins the A22 and the depot has a long history of light industrial uses. Although existing stockpiles in the south-eastern part of the site can be seen from Summerhill Lane and views can be obtained of the vertical silo from the road to the east of the site, they are not considered to be significant. Most public views across the site are limited to glimpses from Summerhill Lane or the A22 as the boundaries are well screened by mature tree belts. Despite this, a condition is recommended to require planting in gaps along the boundary hedgerows, which would enhance the screening of the site, thereby reducing any visual effect.

### Lighting

6.19 The proposed new external lighting scheme would comprise lights that would be directed downwards into the site resulting in no spillage beyond the boundaries. Due to the distance of the site to the nearest sensitive receptors, the effects of lighting at the site to the occupiers of residential properties would be low.

### Traffic

6.20 The proposals would not result in an increase in throughput of waste materials and so would not result in a corresponding increase in traffic. All vehicle movements associated with the highways contracting and waste management uses would continue to use the A22 access and egress. Vehicle movements associated with the HMO accommodation would not be significant and it would be likely that drivers would use the A22, given its proximity to the Brownings property.

### **Access**

6.21 Policy WMP26 of the Waste and Minerals Plan requires proposals to have appropriate access and parking arrangements and not to generate unacceptable safety hazards for other road users or a level of traffic that would exceed the capacity of the local road network. Saved Policy TR3 of the Wealden Local Plan also requires proposals not to create unacceptable traffic conditions and to provide a satisfactory means of access.

6.22 The depot benefits from direct access and egress onto the A22 dual carriageway and includes a bespoke deceleration lane approaching from the north. This arrangement would continue to be used following the implementation of the proposed development. The proposal would not increase the throughput of materials controlled by the site's Environmental Permit and it

is not anticipated that there would be a significant increase in vehicle movements following the development. Car parking provision would be re-located from the depot to the garden of Brownings and would include additional spaces. The Highway Authority (HA) raises no concerns on these matters.

6.23 However, the HA does raise concerns regarding the use of Summerhill Lane as an access and egress from the Brownings property. This is because there would be a likely increase in the number of vehicle movements compared to when the property was used as a single-family dwelling house, in conjunction with there being poor visibility when leaving the property onto Summerhill Lane. In response to this concern, the applicant has reduced the potential number of movements from the property by restricting them to HMO residents only, as the initial proposals had sought to include all staff and visitors. Consequently, it is not anticipated that an increase in movements would be significant or result in unacceptable conditions, as the number of movements would depend on various factors, including the number of residents living at the property at any one time.

6.24 Given the poor visibility and proximity of the Summerhill Lane access in relation to the A22, the HA has recommended that visibility should be increased to provide visibility splays of at least 2.4m x 30m. These splays can be achieved by cutting back the existing hedgerows both to the east and west of the access while avoiding the trees which are subject of the TPO. This is acceptable and a condition is recommended for the submission of details for the removal of vegetation and for mitigation planting to be agreed first before works are undertaken to improve visibility.

6.25 The HA also raises a concern regarding the width of the Brownings' access as two cars are currently unable to pass each other simultaneously. However, although an extension to the width of the access could have the effect of allowing extended views into the site from the road and land to the south, it would reduce the potential risk to highway safety.

6.26 Subject to the recommended conditions on access restrictions and works to the visibility splays and access, it is considered that the proposal is acceptable on highway grounds.

### **Ecological considerations**

6.27 The Natural Environment and Rural Communities Act (NERC) Act 2006 states that every public authority must have regard to the purpose of conserving biodiversity in exercising its functions. The NPPF also states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing sites of biodiversity value and minimising impacts on and providing net gains for biodiversity. Policy WCS12 of the Wealden Core Strategy seeks the prevention of a net loss of biodiversity resulting from development while aiming to achieve a net gain through development proposals.

6.28 Although the main part of the application site is an existing depot, it also includes a relatively large garden attached to the Brownings property and well vegetated boundaries. As the proposals would affect the garden of Brownings and include the removal of trees, which could affect protected species, an Ecological Appraisal has been submitted to support the application, as well as a Bat Activity Survey report.

6.29 Given the nature, scale and location of the proposed development, there are unlikely to be any impacts on any sites designated for their nature conservation interest in the wider locality. However, at a more local level, species-rich hedgerows are present along the southern and eastern boundaries of the site, which comprise a diverse understory of plants with mature trees, including oak and beech. The hedgerow along the western boundary is also species-rich and similar in composition to those at the eastern and southern boundaries but also includes horse chestnut, hazel and field maple.

6.30 These hedgerows will be retained, and it is important that they are protected and enhanced, where appropriate, through tree planting within gaps. The mature oaks on the southern boundary are largely protected by a TPO and offer moderate roost potential for bats. Through the bat survey, it has been confirmed that several species of bats are present in the locality and it is crucial that they are able to continue to commute and forage without disturbance from the development, including from new lighting. The new lighting proposals have taken the behaviour of bats into account and light levels exceeding 1 lux (a recognised threshold for potential disturbance to bats) along boundary ecological corridors would be low, while dark corridors would be retained beyond the limits of the site. The proposals also include internal modifications to two buildings, but both are assessed as offering low bat roost potential. However, there would be no external or roof modifications and no extensions into roof space and so no potential roost features would be affected.

6.31 As well as bats, other protected species have been considered. The potential for the waterbody on site to support Great Crested Newts is low and there is little suitable terrestrial habitat within the site, such habitat being restricted to the boundaries. The presence of badgers has also been investigated but no evidence has been found. Therefore, the likely absence of these species means that they are not a constraint to the development. Despite this, if these or other protected species are encountered during construction, it would be necessary for work to stop and appropriate advice sought on how to proceed.

6.32 The recommended enhancements set out in the Ecological Appraisal and Bat Activity report (namely, the gapping up of hedgerows and provision of bat boxes) should be required to provide a measure of net gain for biodiversity. Provided the recommended mitigation and enhancement measures are implemented, the proposal can be supported by the policies in the Development Plan and NPPF which seek to protect and enhance biodiversity.

## Trees

6.33 Saved Policy EN12 of the Wealden Local Plan seeks to retain and enhance the contribution of trees and woodland areas to landscape character and Saved Policy EN14 requires, in appropriate cases, provision for landscaping, including the retention of trees and hedgerows, and for such provision to complement the scale and character of the locality, while having regard to the associated nature conservation interests.

6.34 As referred to above, the site benefits from well vegetated boundaries, including mature trees on its western, southern and eastern sides, which are important in screening the site and development from views outside. A TPO identifies trees along the southern and south-western boundaries bordering Summerhill Lane and within the garden of Brownings. Given the importance of trees at the site, an Arboricultural Assessment and Method Statement (together with a Tree Protection Plan) have been submitted to support the application. The contribution of trees in the local landscape has been assessed, together with the identification of trees to be removed and retained, including the proposed measures to protect retained trees during construction.

6.35 The proposals involve extending contracting operations into the southern part of the site and into the garden space of Brownings, which would result in the loss of some trees. Based on criteria in British Standard (BS) 5837 (Trees in Relation to Design, Demolition and Construction), the submitted arboricultural assessment identifies two Category A trees, one Category B tree (and part of another) and 21 Category C trees (and parts of three others) to be removed. These trees are well within the site, not on the boundaries, and are not prominent as skyline features from any public viewpoints. Consequently, none of these trees have the potential to significantly contribute to local landscape character because existing large trees that are on the boundaries of the site (and which would be retained) conceal views into the site. Indeed, many of the large boundary trees are significant (and subject to the TPO) and would buffer the loss in relation to the effect on local character. Despite this, the anticipated loss of the Category A and B trees in particular is regrettable, and new tree planting is recommended to provide mitigation.

6.36 New tree planting is feasible at the site as a means of providing mitigation by supplementing retained trees and enhancing local landscape character. The applicant considers that there is sufficient space for new trees to be planted in locations where they will have the potential to reach a significant height without inconvenience to operations and be sustainable in the long term, thereby significantly improving the potential of the site to contribute to the local landscape character. The main area for new planting has been identified along the northern boundary and it is proposed to plant trees including oak, field maple and hawthorn, although new planting is also recommended along other boundaries where there are gaps. To secure appropriate planting at the site, conditions are recommended for appropriate details to be submitted, as well as the submission of a long-term management strategy to enhance local landscape character. It is also recommended that stockpiles of materials should be moved away from the boundaries to prevent damage to the root protection

areas of the hedges and trees within them, as there appears to be some associated damage to trees at the south-eastern boundary. Subject to these measures, the development can be supported in relation to the effects on trees and it is not considered that there would be a conflict with Development Plan policies.

6.37 The TPO affecting the Brownings property relates to three individual trees and to three groups of trees. In terms of the latter, they are located along the boundary of the property with Summerhill Lane, comprising thirteen oaks and two horse chestnuts. These would be retained and continue to provide important screening to the site from the Lane and wider area, as well as significantly contributing to local landscape character and to wildlife. One of the individual trees (an oak) is located at the south-eastern corner of the site and appears to be unaffected by the proposals. The other two individual trees (a cherry and a beech) are located within the garden of Brownings and are identified for removal. They both fall within Category C and are considered of low value in the context of BS 5837. As such, they do not contribute materially to the local landscape character and their loss is not considered to be significant.

## **Drainage**

6.38 The application site is in a Flood Zone 1, which is an area that has a low probability of flooding. The nearest watercourse to the site is located to the south-east of Summerhill Lane and the site discharges both surface water and treated foul water to it via pipework under the road into an area controlled by the Pevensey and Cuckmere Water Level Management Board. Although the risk of flooding is low, the effects of climate change will increase the risk. Therefore, in order to mitigate flood risk, adequate control measures need to be considered to ensure that surface water runoff is dealt with at source and the flood risk on and off site is not increased during the lifetime of the development.

6.39 The site is largely developed and following the completion of the proposed development, the total impermeable site area will increase from about 1.52 hectares to 1.935 hectares and therefore, the surface water runoff will need to be managed appropriately. This is proposed to be achieved using complex flow control devices, together with a pond, a swale and geocellular tanks at the southern boundary of the site. The proposed flow control includes two orifice plates (metal discs with concentric holes inserted into a pipe) and the attenuation requirements generated by limiting discharge rates would be accommodated in a cascade configuration of the proposed devices typically used in sustainable drainage systems. Therefore, the pond (to store water and attenuate runoff), would be located at the lowest level, with the swale (a vegetated channel to intercept, treat and convey runoff) positioned 0.5m above the pond; geocellular crates (cuboid plastic structures, surrounded by an impermeable geomembrane and backfilled with the excavated soil to form an attenuation tank) would be installed below ground but 0.1m above the swale. As such, sediments would accumulate in the pond and reduce the maintenance requirements for the upstream devices.

6.40 Runoff from the heavy site pollution areas would be intercepted by a network of channels and drained to catch-pits and ultimately conveyed to the pond, together with additional bespoke treatment in the form of a Hydro Downstream Defender (or similar specification device) downstream of the pond to capture the pollution not retained within the pond. The discharge would be to a watercourse and so would need to meet all the relevant water quality standards set by the EA.

6.41 The Lead Local Flood Authority has considered the proposals and raises no objections, in principle, although recommends conditions. However, it notes that the proposed runoff rates have not yet been agreed with the Pevensy and Cuckmere Water Level Management Board, which is subject to a separate consenting process. The applicant will need to apply to the Board for discharge consent. Subject to these controls, the proposal is considered to be acceptable in terms of flood risk and drainage and is therefore supported by Policy WMP28a of the Waste and Minerals Plan and the relevant provisions of Part 14 of the NPPF.

### **Use of Brownings property**

6.42 Policy WMP22 of the Waste and Minerals Plan supports, in principle, proposals for increased operational capacity within existing waste management facilities where, for example, the development is required to meet current environmental standards or to improve the operational efficiency of the facility.

6.43 The former residential property of Brownings has been in the ownership of the Hailsham Roadways business since 2004 and is currently used (in part) for offices and accommodation. The northern extension to the property comprises a meeting room, two bathrooms, a kitchen and office space for 30 staff.

6.44 The applicant intends to fully convert Brownings into a property that can serve the business more efficiently by extending the office space further into the ground floor to create a new reception area, meeting room and welfare space. The first floor and roof space on the second floor would be converted to create HMO accommodation with 8 units in total. Providing on-site accommodation to staff would provide a range of benefits. It would give existing staff, who are based outside of the locality, a place to stay while permanent accommodation is arranged, as well as providing a safe place to stay, for example, following a family breakdown. Although most of the existing garden area would be developed to house the extension to the contracting operations and to accommodate car parking, an area would be retained for the use and amenity of staff.

6.45 As new HMO accommodation is proposed, the Housing and Property Services Department at Wealden District Council would be involved in its regulation. It has noted that, should planning permission be granted, the applicant would need to ensure that an application is made for an HMO licence to cover the premises.

6.46 The full conversion of Brownings into office, welfare and HMO accommodation, will make better and more efficient use of the available space at the property and provide a valuable resource to the business and staff. As such, the proposed use of Brownings is considered acceptable and accords with Policy WMP22 of the Waste and Minerals Plan.

## **7. Conclusion and reasons for approval**

7.1 In accordance with Section 38 of the Planning and Compulsory Purchase Act 2004 the decision on this application should be taken in accordance with the Development Plan unless material considerations indicate otherwise.

7.2 The proposal is to undertake improvements and an extension to the existing Woodside Depot site involving both the highways contracting operation and the waste management facility and to fully convert the Brownings property to include HMO accommodation. The new proposals would include erecting a new storage building, extending operations into the garden of Brownings, improving site drainage and lighting and regularising the recently installed vertical silo and batching plant. The proposals have attracted both objections and support.

7.3 The principle of the development is supported by policies in the Waste and Minerals Plan, including on sustainable waste management, using waste as a resource, safeguarding existing waste sites and increasing the capacity of existing waste sites. Although some trees would need to be removed, new tree planting and landscaping proposals would be included. No adverse effects are anticipated regarding protected species and measures to enhance hedgerow planting would benefit bats. The Brownings property would be used more efficiently for staff and improved access arrangements would be carried out from Brownings onto Summerhill Lane. Although the proposals have the potential to affect amenity through noise and dust, the existing and recommended controls on operations should reduce the incidence of adverse impacts.

7.4 Consequently, it is considered that the proposal accords with Policies WMP3b, WMP6, WMP7a, WMP19, WMP22, WMP23a, WMP23b and WMP24a of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013, Policies SP4 and SP6 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan 2017 and the provisions of Part 6 of the National Planning Policy Framework 2019. It is also considered that the proposal does not conflict with Policies WMP25, WMP26, WMP27 and WMP28a of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013, Saved Policies EN27, EN29 and TR3 of the Wealden District Local Plan 1998, Policy WCS12 of the Wealden District Core Strategy Local Plan 2013 and the provisions of Parts 12, 14 and 15 of the National Planning Policy Framework 2019.

7.5 In considering this planning application, the County Council has worked with the applicant and agent in a positive and proactive manner. The Council has also sought views from consultees and neighbours and has considered these in preparing the recommendation. This approach has been taken positively and proactively in accordance with the requirement in the NPPF, and as set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

7.6 There are no other material considerations and the decision should be taken in accordance with the Development Plan.

## **8. Recommendation**

8.1 To recommend the Planning Committee to grant planning permission subject to the following conditions:

1. The development hereby permitted shall be commenced before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990.

2. The development hereby permitted shall be carried out in accordance with the plans, drawings and documents listed in the Schedule of Approved Plans.

Reason: For the avoidance of doubt and in the interests of proper planning.

3. During the daytime there shall be no crushing, screening or batching activities at the site except between the hours of 07.00 - 18.00 on Mondays to Fridays inclusive and 07.30 - 12.30 on Saturdays and at no time on Sundays, Bank or Public Holidays.

Reason: In the interests of safeguarding the amenities of persons in the locality, in accordance with Policy WMP25 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013.

4. The operational noise rating level determined at the noise sensitive receptors identified in the 24 Acoustics report, dated 27 August 2020 (ref. R7412-2 Rev 2), shall not exceed +5 dBA above the background noise level at any time during the day (i.e. between the hours of 07.00 - 18.00), as determined in accordance with BS 4142:2014 +A1:2019.

Reason: In the interests of safeguarding the amenities of persons living within the locality, in accordance with Policy WMP25 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013.

5. The operational noise rating level determined at the noise sensitive receptors identified in the 24 Acoustics report, dated 27 August 2020 (ref.

R7412-2 Rev 2), shall not exceed the background level at any time during the night (i.e. between the hours of 18.00 - 07.00), as measured in accordance with BS 4142:2014 +A1: 2019 except for up to 36 times per calendar year when the operational noise rating level determined at the identified noise sensitive receptors shall not exceed +5 dBA above the background noise level at any time during the night (i.e. between the hours of 18:00 – 07:00), as measured in accordance with BS 4142:2014 +A1: 2019.

Reason: In the interests of safeguarding the amenities of persons living within the locality, in accordance with Policy WMP25 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013.

6. Within 3 months of the site becoming fully operational following the implementation of the development an assessment of the operational noise at the noise sensitive receptors identified in the 24 Acoustics report, dated 27 August 2020 (ref. R7412-2 Rev 2), shall be undertaken in accordance with BS 4142:2014 +A1:2019 to determine compliance with the noise rating level conditions and be submitted to the Director of Communities, Economy and Transport for consideration and approval. The noise assessment must include a scheme of additional noise mitigation measures if there is evidence that the noise conditions are not being met. All additional noise mitigation measures must be implemented within 3 months of the measures being agreed with the Director and maintained for the duration of the development.

Reason: In the interests of safeguarding the amenities of persons living within the locality, in accordance with Policy WMP25 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013.

7. The access from the Brownings property onto Summerhill Lane shall not be used except by persons living as residents in the Brownings HMO accommodation.

Reason: In the interests of highway safety and the amenity of persons living in the HMO accommodation, in accordance with Policies WMP25 and WMP26 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013.

8. Prior to the commencement of development involving the HMO accommodation at Brownings, the following details on changes to the access arrangements at the Brownings property shall be submitted to the Director of Communities, Economy and Transport for approval in writing:
  - (1) The extent of the removal of vegetation either side of the Brownings' entrance onto Summerhill Lane to secure an increase in visibility (to accommodate splays of 2.4m x 30m) for drivers exiting the site;
  - (2) The proposals for planting to the rear of the visibility splays in point (1) to mitigate for the loss of the hedgerows; and

(3) The measures to modify the access of Brownings with Summerhill Lane to accommodate a width of 5 metres for a distance of at least 5 metres back from the edge of the carriageway.

The approved details to the access arrangements shall be implemented in full prior to the completion of the HMO accommodation, unless otherwise agreed in writing with the Director.

Reason: In the interests of highway safety, local landscape character, protection of trees and biodiversity, in accordance with Policies WMP26 and WMP27 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013, Policy WCS12 of the Wealden Core Strategy Local Plan and the provisions of Part 15 of the National Planning Policy Framework 2019.

9. Prior to the construction of any new hardstanding, a detailed scheme for a surface water drainage system at the site shall be submitted to and approved in writing by the Director of Communities, Economy and Transport. The scheme shall include the following:

1. Detailed drawings and hydraulic calculations, which shall take into account the connectivity of the different surface water drainage features and be able to demonstrate that surface water flows can be limited to the greenfield rate for the respective rainfall event, including those with a 1 in 100 (plus allowing for climate change) annual probability of occurrence;
2. Details of the outfall of the proposed drainage system and how it connects into the watercourse, including cross sections and invert levels;
3. Information on how surface water flows exceeding the capacity of the surface water drainage features will be managed safely; and
4. The detailed design of the surface water drainage features which shall be informed by findings of groundwater monitoring between autumn and spring at the location of the proposed attenuation features. The design should leave at least a one metre unsaturated zone between the base of the drainage structures and the highest recorded groundwater level. If this cannot be achieved, details of measures which will be taken to manage the impacts of high groundwater on the hydraulic capacity and structural integrity of the drainage system shall be provided.

The scheme shall be implemented in accordance with the approved details.

Reason: In the interests of managing surface water effectively and minimising the risk of flooding, in accordance with Policy WMP28a of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013.

10. Prior to the construction of any new hardstanding, a maintenance and management plan for the entire drainage system at the site shall be submitted in writing to the Director of Communities, Economy and Transport for written approval, thereby ensuring that the designed system

takes into account the design standards of those responsible for maintenance. The plan shall include the following:

1. A clear statement of who will be responsible for managing all aspects of the surface water drainage system, including piped drains; and
2. Evidence of how the arrangements in point 1 above will remain in place throughout the lifetime of the development.

The plan shall be implemented in accordance with the approved details for the duration of the development.

Reason: In the interests of managing surface water effectively and minimising the risk of flooding in accordance with Policy WMP28a of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013.

11. Prior to the construction of any new hardstanding, details for the management of flood risk, both on and off site, during the construction phase shall be submitted to the Director of Communities, Economy and Transport for written approval. The approved details shall be carried out in full.

Reason: In the interests of managing surface water effectively and minimising the risk of flooding in accordance with Policy WMP28a of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013.

12. Prior to the occupation of the development evidence, including photographs, which shall demonstrate that the drainage system has been constructed in accordance with the final agreed detailed drainage design, shall be submitted to the Director of Communities, Economy and Transport for consideration and approval.

Reason: In the interests of managing surface water effectively and minimising the risk of flooding in accordance with Policy WMP28a of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013.

13. Prior to the commencement of any works to trees or hedgerows at the site the following details shall be submitted to the Director of Communities, Economy and Transport for approval in writing. The details shall include:
  1. Planting proposals on the northern boundary of the site and within identified gaps in other boundaries of the site, including species, numbers and spacings of plants;
  2. Measures for the withdrawal of material stockpiles from the boundaries of the site and their containment thereafter;
  3. Proposals for planting between the new containment lines for the material stockpiles and the existing hedgerows;

4. A long term landscape management strategy for newly planted areas and enhanced management for existing scrub and tree habitats; and
5. Locations for the installation of 4 bat boxes on trees identified as having roost potential for bats.

The approved details shall be carried out in full.

Reason: In the interests of visual amenity and the protection and enhancement of habitats and biodiversity, in accordance with Policies WMP25 and WMP27 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013 and Policy WCS12 of the Wealden Core Strategy Local Plan 2013.

14. The provisions for the protection and management of retained trees set out within the Arboricultural Assessment and Method Statement, Barrell Tree Consultancy, dated 28 February 2020, shall be carried out in full, unless otherwise agreed in writing with the Director of Communities, Economy and Transport.

Reason: To secure the appropriate management of retained trees, in accordance with Saved Policies EN12 and EN14 of the Wealden District Local Plan 1998.

15. No pile or stockpile of material shall exceed six metres in height.

Reason: In the interests of visual amenity, in accordance with Policy WMP25 of the East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan 2013.

#### INFORMATIVE

1. The Applicant's attention is drawn to the provisions and requirements of the following in the undertaking of the development:

The Wildlife and Countryside Act 1981 (as amended).

Tree Preservation Order, Hailsham, No. 25, 1990.

The Pevensey and Cuckmere Water Level Management Board's discharge consenting process.

Wealden District Council licence application for HMO accommodation.

#### Schedule of Approved Plans

BA1652.09 - Proposed Site Layout, BA1652.01A - Site Location, ELE/01 - Storage Barn Indicative Elevations, SUR/01 - Draft Topographic Survey as at July 17, PL 1429 - Arrangement of 809 Weigh Hopper & Support Structure Sheet 1 of 1, BA17110.10 - Brownings HMO Layout and Elevations, Planning

Statement April 2020, Lighting Assessment, Arboricultural Assessment & Method Statement, Tree Protection Plan, Surface Water Drainage Design, Bat Activity Survey Report, R7412-2 Updated Noise Impact Assessment, Updated Dust Impact Assessment & Management Plan, R7412 5 Rev 1 Hailsham Roadways Noise Management Plan

RUPERT CLUBB

Director of Communities, Economy and Transport

8 December 2020

**BACKGROUND DOCUMENTS**

Application WD/843/CM

Wealden District Council planning permissions

The Development Plan

National Planning Policy Framework 2019