

**PROPOSED CHANGE OF USE FROM SCRAP YARD TO SCRAP YARD
AND RECYCLING OF WASTE MATERIAL, DRAYTON RECYCLING,
THORNEY MILL SIDINGS, IVER, BUCKINGHAMSHIRE.
APPLICATION SBD/8210/00
APPLICANT: DRAYTON RECYCLING
BUCKS STREET ATLAS PAGE 208 B2**

To: Development Control Committee

Date: 5 December 2000

Author: Head of Spatial Planning

A PURPOSE OF REPORT

1 To determine the above application.

B PROPOSED ACTION

2 **The Committee is invited to REFUSE application no. SBD/8210/00 for the proposed change of use of scrap yard to scrap yard and recycling of waste materials, Drayton Recycling, Thorney Mill Sidings, Thorney Mill Road, Iver, Buckinghamshire, for the following reasons:**

- i The proposal is contrary to Policy GB3 of the County Structure Plan, Policy WLP15 of the Adopted Waste Local Plan and Policy GB1 of the Adopted South Bucks District Local Plan in that it is not one of the listed exceptions for development in Green Belt. Accordingly the proposal represents inappropriate development in the Green Belt. Furthermore the applicant has failed to demonstrate that the development is required to meet a proven need which cannot be satisfactorily met elsewhere and that very special circumstances exist to justify an exception to these policies.**
- ii The applicant has failed to provide detailed drawings and information in support of the application contrary to Policy WLP21 of the Adopted Waste Local Plan for Buckinghamshire. Also, the lack of detailed information provided means that the application is contrary to the provisions of Policy WLP 20 of the Adopted Waste Local Plan. Accordingly, the applicant has failed to demonstrate that the proposal would not give rise to an unacceptable impact in terms of noise, dust and odour at nearby residential properties.**
- iii The site lies within the Colne Valley Park and the development is considered to be contrary to Policy UF2 of the County Structure Plan, and Policy L6 of the Adopted South Bucks District Local Plan in that the proposal would**

result in the urbanisation of the Park. Furthermore the applicant has failed to demonstrate that the proposal would not have a detrimental impact on the overall amenity of the Colne Valley Park.

- iv The proposal would generate HGV movements through nearby residential areas to the detriment of the amenities of local residents in terms of noise, vibration and general disturbance and accordingly the proposal is contrary to Policy WLP20 of the Waste Local Plan, TR11 of the County Structure Plan and EP9, TR5 and TR10 of the Adopted South Bucks District Local Plan.**
- v The application is contrary to Policy WLP21 of the Waste Local Plan in that the past and current performance of the applicant in operating a waste management facility leaves the County Council with little confidence the development would be operated within the limits and conditions of any permission granted.**

C RESOURCES APPRAISAL

3 Not relevant.

D SUPPORTING INFORMATION

4 The application was received on 21 July 2000. Consultations were sent out on the 7 August 2000. The application was advertised as a departure from the Development Plan.

Application

- 5 The application proposes the change of use from a scrap yard to a scrap yard and the recycling of waste materials.
- 6 The proposal involves the collection of waste from skips, from both domestic and commercial sources, which would be brought to the site and tipped inside a new collection shed. The waste would be sorted within the shed by a screening machine into component parts of timber, glass, paper, metal, bricks, textiles and plastic. Reference is also made to the screening of soils on site. In terms of storage of the sorted material, paper and plastics would be baled and put on pallets and stored outside along with screened topsoil and subsoil. The new baling machine would also be located within the new collection shed. Reference is also made to refurbishment of the hard surfacing of the yard and the provision of a new septic tank to collect surface water from the buildings and hardstanding area. The height of external stored materials would not exceed 5 metres. The sorted materials would then be transported off site in bulk.
- 7 The supporting documentation indicates that the development would be primarily served by the applicant's own skips, which amount to some 200 in number. Empty skips would be stored at the northern extent of the site. However the applicant also indicates that other skip operators would be able to deposit material for recycling at the site.

- 8 The applicant indicates that the development would serve Middlesex and Slough and the north west of London as far out as Windsor and Maidenhead. With regard to the destination for the recycled material, the paper, textiles and plastic would be baled, containerised and sold abroad. Hardcore and screened soil would be sold from site. Sorted glass would be sent for reprocessing in St Helens and all non-recyclable waste would be sent to the disposal site at Brogborough in Bedfordshire. The applicant indicates that discussions have been held with English, Welsh and Scottish Railways with regard to the export of sorted materials by rail using the adjacent railway sidings.
- 9 Wind blown litter from the waste materials stored outside would be minimised by sheeting of piles of waste awaiting recycling. Dust would be minimised by the installation of a sprinkler system for use in dry weather. Although the applicant considers that noise would not be an issue bearing in mind the existing scrap yard use on the site and the adjoining Aggregate Industries site, the supporting information indicates that a noise assessment is being prepared. To date this has not been received.
- 10 The applicant indicates that the existing scrap yard generates some 60 vehicle movements per day. If the proposed development is established this would generate a further 20 movements a day.
- 11 The proposed hours of operation are 7am to 5pm Mondays to Fridays and 7am to 1pm on Saturdays with no working on Sundays and Bank Holidays. The applicant indicates that these hours reflect those of the existing scrap yard. A weighbridge and office are currently on site and used in association with the scrap yard.
- 12 Access is obtained onto Thorney Mill Road via the shared access with Bardons, although this is not explicitly detailed in the application.

Applicant's Supporting Statement

- 13 In support of the proposal the applicant indicates that:
 - The site is well suited to this activity as it does not adjoin any residential properties and that it already has permission for the storage and processing of scrap metal. This activity has been on site prior to 1957;
 - It is well located on the road network;
 - It is well placed to serve a wider population for waste transfer;
 - The site adjoins an active rail sidings and there is the opportunity for bulked items to be removed by rail;
 - Although the site is in the Green Belt and Colne Valley Park, the existing use of the site as a scrapyards, means that there would be harm to Green Belt policies. In addition the prospect of finding a site outside of the Green Belt is remote;

- The site is clearly within an industrial area, enclosed by railway lines and adjacent to the large Bardons plant;
- The development would not be visible from outside of the site.

Site Description

- 14 The application site, some 2.5 ha in extent which is lawfully used as a scrap yard, is located some 150 metres to the north of Thorney Mill Road. The site is bounded to the west by the Poyle to West Drayton branch line beyond which lies a golf course and to the east by the Aggregate Industries coated roadstone plant. The site is some 300m in length and 30 metres in width.
- 15 The site lies within both the Green Belt and the Colne Valley Park.

Site History

- 16 The site has been used for the purposes of recycling scrap metal since 1957. Temporary planning consent for that use until September 1968 was granted on appeal and subsequently extended until 1984. In 1984 an application was submitted for a permanent consent. This was eventually granted consent by SBDC in January 1991 subject to conditions. One of these conditions relating to the height of scrap materials was appealed and subsequently granted. The amended condition limits the height of the scrap material on site to 5m anywhere on site.

Planning Policy

- 17 Policies GB3(Control of Development in Green Belt), UF2(Colne Valley Park), WM6(site selection for waste management facilities, TR11(HGVs) and P2(noise pollution) of the County Structure Plan and policies WLP4(waste transfer facilities), WLP11(inert waste recycling facilities), WLP15(Green Belt), WLP16(planning constraints) and WLP18(Proximity Principle) of the Waste Local Plan are relevant. Policies GB1(Green Belt), L6(Colne Valley Park), TR5 and 10(Traffic generation and HGVs) of the Adopted South Bucks District Local Plan are also relevant and attached as Appendix A.

View of the District Council

- 18 South Bucks District Council objects to the application for the following reasons:
- The proposal would represent inappropriate development in the Green Belt. Whilst the site has an existing industrial character, it is situated within the Green Belt and adjoins open land. The proposal would represent an intensification of activity at this site which this Council is concerned would lead to a further reduction in the openness of the Green Belt in this particular location.

- The proposal would result in additional commercial vehicle movement on part of the road network which is already characterised by high flows of HGVs. The additional movements would cause further harm to the amenities of the area.

19 If the County Council is minded to grant planning permission for the proposal then South Bucks District Council request that a condition is imposed limiting noise from the development in order to protect the amenities of the area.

Consultations

20 The local member for Iver, Mr Worrall, strongly objects on the grounds that the scheme is inappropriate in the Green Belt and Colne Valley Park and would result in the intensification of HGVs movements on the already busy local highway network to the detriment of the amenity of local residents.

21 Iver Parish Council objects to the application on the grounds that it would lead to an increase in heavy lorries bringing waste for recycling when the roads in the area already carrying more than they were built for.

22 Comments are awaited from the Highway's Development Control Engineer.

23 The County Landscape Advisor expressed reservation about the proposal commenting that the site is within the Green Belt and Colne Valley Park without detailed elevations of the proposed building it is very difficult to assess its impact.

24 The London Borough of Hillingdon (Environmental Health) comments that historically complaints have been received from Hillingdon residents regarding noise from this site when it was operated by Steel Supply Company Ltd. If noisy activities connected with the recycling are anticipated then a noise assessment is required. As recycling operations can be dusty, especially in relation to soil screening and concrete crushing, then consideration must be given to the potential impact of dust emissions.

25 The Environment Agency has no objection in principle to the proposed development subject to the imposition of conditions relating to the control of surface and foul water drainage. The Agency also comment that the existing metal scrap yard operates under an exemption from a full waste management license. The Environment Agency is also closely monitoring the site following a number of complaints regarding out of hours activities.

Representations

26 The application was advertised by means of a site notice, press advertisement and neighbour notification. At the time of writing 7 letters of objection have been received, including one from the local MP for Hillingdon, based on the following grounds:

- The proposal would generate additional noise, dust and smells and would have a detrimental impact on residents living in the Garden City Estate;

- The proposal would devalue properties in the area;
- The site sometimes operates at night;
- The proposal would generate more HGV traffic in the local area which is already overloaded;
- Drayton Recycling's track record is not encouraging with management of present activities poor or non-existent. In this respect flytipping and encroachment onto land owned by Aggregate Industries land is particularly concerning. If consent is approved all externally stored and processed material must be retained in appropriate enclosures.

27 One of the letters originates from the West Drayton Garden City Residents Association. In addition to the points raised above, the Residents Association raise the following additional points:

- The application glibly refers to the transfer of recycled materials by rail. No explanation of the use of rail sidings is given. Considerable further development would be required to facilitate loading and unloading. This represents a great deal more development than is contained in the application;
- The proposal outlined in the application is very vague which should ring alarm bells regarding the extent of the proposed use;
- The present scrap yard does not meet the EEC standards for the provision of drainage and hardstanding;
- Some of the existing operations, including the skip hire operations, may be unauthorised.

Discussion

28 The main issues to be considered with this application are compatibility of the development with Green Belt and Colne Valley Park policies, the impact of additional traffic, noise and dust, the level of information submitted with the application and the past performance of the applicant in operating a waste management facility.

Green Belt

29 The site is located within the Green Belt where there is presumption against development. The proposed development is not one of the listed exceptions and the proposal is therefore considered to be inappropriate development in the Green Belt. Inappropriate development is by definition harmful to the Green Belt. Therefore it is important to consider whether very special circumstances have been demonstrated by the application to outweigh this harm.

Need and alternative sites

- 30 The first potential circumstance is that of a need for the development. Policy WLP4 in the Waste Local Plan seeks to encourage the establishment of transfer stations to meet local needs subject to them meeting certain locational criteria. However Policy WLP15 of the Waste Local Plan clearly states that the permission will not be given for waste management facilities in the Green Belt with a number of exceptions including facilities which would preserve the openness of the Green Belt and would not conflict with the purposes of Green Belt designation.
- 31 With respect to local need I have concerns that the development would be serving a much wider area bearing in mind the large market area identified by the applicant. Furthermore no alternative site assessment has been submitted by the applicant in the identified market area. In this respect I am also conscious that there are at least 12 other licensed waste transfer/recycling sites within a 10 mile radius of the site. The list of these sites is attached as Appendix C to the Bisons Yard report. It therefore seems that there are other alternative sites available to meet the local needs.

Impact on the Landscape

- 32 Whilst the site is generally well screened the site is open to views from Thorney Mill Road from the bridge over the Poyle Freight line. In addition views of the site may be obtained from the golf course to the west during the winter months. Whilst the site does have an existing industrial character it does lie on the outer edge of an area of industrial uses. Therefore any proposal to intensify the use, including the provision of an additional building would in my opinion lead to the reduction in the openness of the Green Belt at this location.

Existing On site uses

- 33 Clearly the existing use of the site as a scrapyard has to be recognised, which itself is an unsightly and noisy operation. However I am concerned that from the scant information submitted with the application that the extent and intensity of the proposal is significantly greater than that inferred to in the supporting documentation. Indeed reference is made to a new building and a baling and sorting machine all of which would require significant investment and waste throughput. Furthermore the supposed use of the rail sidings for exporting bulked up material, would be likely to involve further infrastructure provision which has not been detailed in the application.
- 34 Taking account of the above I do not consider that very special circumstances have been demonstrated by the applicant and accordingly the proposal is contrary to Green Belt and waste local plan policies.

Colne Valley Park

- 35 The main aims of the Colne Valley Park include:
- To maintain and enhance the landscape in terms of its scenic and overall amenity

- To resist the urbanisation of the Park.

36 Bearing in mind the conclusions drawn above I consider that the additional building and development proposed would involve the significant intensification and further urbanisation of this site. In addition to this it has not been demonstrated that the overall amenity of the Park in this locality would not be compromised by the proposal in terms of noise and dust.

Traffic

37 As can be noted by the local representations received there is considerable concern over the potential impact of additional traffic movements upon the amenity of local residents. Whilst there is no traffic limit on the existing scrap yard, the proposal would clearly result in the additional HGV traffic movements to and from the site. In my opinion the information submitted with the application underestimates the movements that would be generated by the proposal. As has previously been highlighted by the Iver Traffic Review carried out by the County Council in the mid 90s, the area is already suffering from the level of HGVs in the area.

38 Therefore notwithstanding the comments awaited from the Highways Development Control Engineer, I consider that the increased HGV movements would have a detrimental impact on the amenity of local residents in terms of noise, vibration and general disturbance.

Impact Upon residential amenity

39 I do have great concerns about intensifying a noisy and unneighbourly use close to residential properties. Indeed this concern is shared by both South Bucks District Council and the London Borough of Hillingdon. The nearest residential dwellings are located some 180 m to the west in Thorney Mill Road and 200m to the north and east in Colne Avenue.

40 A recycling and waste transfer operation is inherently a noisy business. Indeed new plant and machinery is proposed including a screening and baling plant, both of which are likely to generate very tonal noise. Although I appreciate that the local environment has a relatively high background noise level taking account of the existing scrap yard, the intensification of a potentially noisy use, in relative close proximity to residential dwellings is likely to be unacceptable in terms of the impact upon the amenity of these residents. It is therefore imperative that a noise assessment is carried out to assess the potential impact. Although such an assessment has been requested this has not been submitted to date.

41 Similarly no information has been submitted to satisfactorily demonstrate that dust would not be a problem associated with the development.

Amount of Supporting Information

42 The Waste Local Plan requires a certain level of detailed information to be submitted with each waste management application. In this case the application is not accompanied by a large amount of information that would normally be expected. This makes assessing the true impact

of the development very hard. Information that has not been submitted with this application includes:

- No detail of expected amounts of waste to be handled each year;
- No details of site access;
- No detailed of proposed new buildings and plant;
- No details of predicted noise, dust and illumination.

43 In addition to this the details of the land ownership as declared in the application may also be questionable. If the applicant is not the landowner then enforcement of planning conditions or the prohibition of activities will be made more difficult.

Past and Current Performance of applicant in operating a waste management facility

44 Policy WLP20 of the Waste Local Plan indicates that when considering applications the County Council will take into account the past and current performance of the applicant in operating a waste management facility.

45 The applicant has previously operated an unauthorised skip hire and waste transfer business from Wood Lane Farm, Iver which eventually ceased operating following a High Court injunction. Furthermore following the applicant's operation of the scrap yard a considerable amount of fly tipped material has appeared in front of the site on the former rail siding.

46 Taking the above into account I have little confidence that the development if permitted would be operated within the limits and conditions of any permission granted. I also note the comments received questioning whether the existing skip hire business is authorised. In this respect I am currently seeking clarification from SBDC whether they consider the skip hire falls within the existing consent. Dependent upon the results of this enquiry enforcement action may be necessary.

Conclusion

47 In conclusion I consider that the proposal is contrary to green belt, Colne Valley Park and waste local plan policies. No very special circumstances have been demonstrated by the applicant to overcome these policies. Indeed I consider that the vagueness of the information provided underestimates the extent of the development proposed. I am very concerned about the potential detrimental impact of the development, in terms of noise and dust upon nearby residential properties and no information has been provided to demonstrate that this would not cause a problem. Accordingly I recommend that the application is refused.

E BACKGROUND PAPERS

County Structure Plan
Adopted Waste Local Plan
Adopted South Bucks Local Plan
Consultee responses

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