

# WESTERN AREA PLANNING COMMITTEE ON 23 JANUARY

## UPDATE REPORT

**Item No:** (2)                      **Application No:** 12/02655/COMIND                      **Page No.** 31

**Site:** Unit 3, Red Shute Hill Industrial Estate, Red Shute Hill, Hermitage

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**Planning Officer Presenting:** Matthew Meldrum

**Member Presenting:**

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**Parish Representative speaking:**                      **Cold Ash:** Councillor Geoff Findlay  
**Hermitage:** A representative  
**Chieveley:** Rob Crispin

**Objector(s) speaking:** Mr Stewart Wright  
Mr Christopher Marriage  
Mr Mike Schofield

**Support(s) speaking:** N/A

**Applicant/Agent speaking:** Mr Kevin Parr

**Ward Member(s):** Councillor Garth Simpson

**Update Information:** Highways information

At the members site visit, the Cllr Bryant sought clarification in respect of the total vehicle numbers that are currently generated by the Red Shute Hill Industrial Estate.

Highways officers do not have any actual surveyed data to rely upon in this regard and have therefore interrogated the TRICS database (the same approach used by the applicant when attempting to ascertain the potential vehicle movements that could be generated by the existing uses permitted at the application site).

This TRICS database suggests that an industrial area the size of the Red Shute Hill estate would generate circa 970 movements per day (485 in and 485 out).

The applicant, when using the TRICS database, suggests that unit 3, under its current permissions, would be expected to generate some 36 vehicle movements (rounded up from 35.507).

The applicant has confirmed that the proposed development will generate 6 large HGV movements (3 in and 3 out) and 26 skip lorry movements (13 in and 13 out) and 10 car movements (5 in and 5 out) making a total of 42 vehicle movements.

As such the proposed development would result in an increase of total vehicle movements from the Red Shute Hill Industrial estate from circa 970 movements to circa 976 movements per day.

It is accepted that the TRICS database is not an accurate measure of vehicle movements but it is a national system that is universally used to predict trip generation from a variety of development types. It is also acknowledged that these overall figures do not necessarily indicate whether the proposal will increase the percentage of HGV's given that the 26 skip lorry movements would be classed as HGV's. However highways officers have confirmed that with distribution uses (B8) there is a significant potential for movements of larger HGV vehicles.

#### Typographical errors

The Recommendation in the report should read:

*The Head of Planning and Countryside be authorised to Grant Planning permission subject to the following conditions and informatives:-*

#### Ward Member Update

Cllr Garth Simpson (Ward Member for Cold Ash Parish, within which the application site is located) is unable to attend this meeting and has submitted the following written statement:-

#### **Harewood Waste Recycling Ltd Proposal, Unit 3, Red Shute Industrial Estate, Red Shute Hill, Hermitage, Application No: 12/02655/COMIND**

##### **Introduction**

I am being allowed to enter a pre-meeting update, as I am unable to attend the Western Area Planning Committee meeting for health reasons. Andrew Rowles is kindly acting as my substitute.

Although its address is Hermitage, the Red Shute Hill Industrial estate falls within the ward of Cold Ash & Ashmore Green and is therefore of prime concern to Cold Ash Parish Council and me, as West Berkshire Councillor for the ward.

##### **Basis of my assessment of the application**

Owing to my inability to attend the Western Area Planning Committee meeting, I have kindly been given early access to a draft of the case officer's assessment of the application, in which he recommends approval under his delegated powers. I have a copy of the Harewood Recycling Ltd's consultant's report, and I attended the site visit by members and spoke to the designated operations manger from Harewood Recycling.

**Grounds for acceptance of the application by the West Berks case officer** can be summarised as follows:-

- The industrial site has 11 units which are licensed to carry on B1(a), B1(c), B8 and B(2) activities;
- Since the waste processing involved is limited to the processing of general skip waste, storage and transfer, primarily of card, metals, wood and plastics, it can be handled within the B2 category, and why should unit 3 not be upgraded, since there are already four B2 licences on the industrial site? I question whether this is a sound planning argument;
- This application involves the use of HGV movements. Since WBC Traffic has approved the impact of the proposal, and argues that it is not truly incremental, since other industrial estate occupiers use HGVs. Hence, HGV movements are not seen to be an issue;

- The industrial site is not within the AONB, therefore the application is acceptable. However, the NPPF is expressly clear, in forthright terms, upon the importance of the AONB. The Cold Ash ward is on the borders of the AONB and about 10% a part of it, with perhaps another 10%, visually de facto a part of it. At the Red Shute Hill Industrial park, the distance is c.100m of sheep pasture from the AONB border. Some sensitivity should be accorded to this;
- The noise appraisal by the consultants is within the guidelines. However, I am not sure what value the consultants place on back ground noise, as this can have a significant effect on the perceived 'noticeability' of vehicle reversing warnings etc. The NPPF makes specific note on para 123 on the need to avoid noise from giving rise to significant adverse impacts on health and quality of life.;
- The site is too small to require an Environmental Impact Assessment, an EIA, by virtue of its size;
- The NPPF emphasizes that we must be pro-business and not inhibit the expansion of economic activity. Whereas the NPPF advises Councils to support economic activity, it notes at para 5 that the Framework does not include specific waste policies, since national waste planning policy will be published as part of the National Waste Management Plan for England. Until that Plan is published by the Waste Planning Policy Statement remains in place;
- The Framework does not contain specific waste policies - see above. The only guidance we get in the NPPF is " local authorities taking decisions on waste applications should have regard to the policies in the Framework".
- Anyway, the NPPF accords the right to process waste on industrial sites, not just approved waste sites, provided criteria are met. WHERE, 100m from the AONB?
- There is then a discussion on how the application meets all the reserved policies of West Berks Council with respect to Planning and Waste Disposal.

The case officer approves the application, with the following provisos:

- Parking and turning and skip storage details must be documented;
- The mechanical extraction system for suppressing noise and smells and dust, must be specified and approved;
- A litter management scheme must be defined and approved,
- The layout and description of the plant to be used must be defined and approved.

### **My analysis of the application**

This application is defective, since such detail that is included harbours many omissions that are important for the residents of the neighbourhood and the other users of the industrial site. I explain them below:

### **Unit 3, Red Shute Industrial Estate**

This is a cramped site of 0.1ha (1000 m squared) with a main warehouse of 450 metres squared and a staff unit of 90 metres squared. Guidelines for waste facilities talk in terms of 0.25ha as being sensible. As such, the main industrial facility is approximately 45m x 10m, with roller doors at each end, and was used as a coach transport repair and service facility. The access drives are c. 10m long for goods inwards and c.12 m long for exported goods. The rest of the site is proposed for skip storage and presumably, the skip trucks parking.

We were told at the site visit, that the conveyor belt system would be installed to run **across** the warehouse, with goods inwards HGVs depositing their skip loads onto the belt, whereupon extraction and sorting equipment would process the waste. Additional equipment, electric trucks would transport the processed waste into storage bays, until export.

The warehouse roller doors are only c. 4m wide, which means that reversing HGV skip trucks will have to 'crab across' the facility to unload at the end of the moving belt. The exporting HGVs will have to reverse to the roller door, as well. Hence, there will much more sound emanating from this part of the operation, due to the reversing alarms which are necessarily intrusive.

### **Just what waste sectors are to be handled at this facility?**

The application proposal talks in terms of the straight processing of card, wood, metals and plastics. But what are the target markets for this operation? Verbally, I was told that this site would be the centre of a waste catchment area of **no less than 18 mile radius or 1,017 square miles**. I was told the real attraction of this application was the proximity of the site to junction 13 of the M4. I was told that if waste recovery was contracted for waste that could not be processed at the site, it would be processed at waste sites that could handle it in the locality. This site was designated for domestic waste of a non-putrescible, no-plant matter, no-soils and non-mineral nature. That is, 'clean waste' that could be easily sorted. **Oh, but there would be screens and a sorting stage at the end of the belt for the residual waste.**

I was also told that when skip contracts were being signed, the nature of the waste to be processed would be agreed, on the spot, so that skip trucks would be directed to take loads to whichever site was required.

This raises a number of questions:

- Just how will the operator guarantee that putrescible matter, soil, plant matter or building minerals will **not** arise from domestic waste? After all, the request by a domestic customer is usually triggered by a project of a DIY nature. Most people are always happy to get rid of waste from the domestic bins provided by WBC, especially when they overflow, as they do at peak festive seasons, and paper/card most of the time. Human nature will prevail, and additional materials will get secreted onto skips. Will all contracts be closed at the customers' sites, or over the telephone? The proposal says that just four people will be employed on the site. The commercial manger is going to be very busy. **This is not a high value – added business.**
- Does this not mean that there will always be smells at the Red Shute site?
- Will there not have to be a shovel loader operating inside the facility and possibly outside?
- If this to be a facility with offices that transact for a wide range of categories of waste from both domestic and industrial users, then will many more in/out HGV movements of empty skips occur than portrayed?
- And will there not have to be additional outward HGV movements using skips, rather than 20 -T HGVs to export the soil, putrescibles and minerals that will inevitably arise from domestic waste?
- And what controls are there, so that waste containing soil, putrescibles, plant matter and minerals is kept to an absolute minimum? No guarantees are being offered, yet by implication a 1, 017 square mile catchment could yield multiples of the waste tonnage envisaged in this application.

### **Just what will be the traffic from Unit 3, Red Shute Hill?**

The traffic forecast in the application is, as follows:

Skip trucks	26
Export 20-T trucks	6
Staff cars	10
Total	42 per day

This forecast is based on an assumption of a 5-tonne load per skip truck. The devil lies in this assumption. The application suggests that there will be single-skip and double-skip Ro-Ro HGVs. Outside the unit on the day of the site visit were 75% 3.5-5T skips and 25% 5-7.5 tonne skips. No clarity was offered as to the mix of single skip and Ro-Ro skip HGVs. This would evolve over time. Waste is notorious for 'bulking out'. Thus one does not expect a full payload to the rated weighted loading of a skip. A working assumption is that waste could bulk out by as much as 40%.

So, the forecast of skip truck movements has to be increased by a sizeable percentage, for:

- Bulking out;
- Export in skip HGVs of putrescibles, soil, minerals and plant matter that nevertheless arise, (not 20T HGVs);
- Empty skip movements for waste that is contracted for, but processed elsewhere,
- Abortive skip movements.

The real number of movements could, perhaps, be as much as 100% or even 200% more. **Remember, this catchment area is 1017 square miles large.**

### **The incrementality of these traffic forecasts**

The case officer's analysis concludes that these traffic movements are not incremental to what can be licensed out of the industrial estate. But this conclusion ignores the fact that the other tenants have different kinds of business, mostly receiving/exporting their goods inwards in a mixture of light vans, pickup trucks and cars. There are three exceptions: Barlow Timber does have HGV goods inwards movements but retails its timber to small builders and DIY customers; Barlow coaches has coach movements, but these are way below the level of the proposed waste facility; and Frontier Country Store has a much lower frequency of goods inwards and outwards in large HGVs. It is the sheer intensity of the skip lorry movements and their unknown daily average which makes this clearly incremental, and an issue for both other tenants of the Red Shute site and neighbours.

### **Noise**

Noise is clearly an issue for appellants, and I have the following questions:

- Does the position of the sensor MPC do justice to the real noise that would be received at Fairmeade?
- Will the noise levels, both shock and ambient, not be much higher, due to the real size of the traffic forecast?
- Will the cramped nature of the site not cause higher ambient noise levels:
  1. Roller doors kept open more often to rid the inevitable putrescent smells?
  2. A shovel loader loading up skips for export?
  3. Traffic contention with other users of the site?
  4. All goods inwards and outwards will entail reversing the HGVs?
  5. Higher number of movements of skip stacks, due to limited skip storage space?

### **Traffic implications for Cold Ash and Ashmore Green ward and immediate neighbours**

Cold Ash and Ashmore Green lies on the frontier of the AONB. It is a very beautiful place. Unfortunately, its roads and lanes provide rat runs for vehicles wishing to drive to/from the Junction 13 of the M4 and Thatcham and to/from the outlying villages and Newbury. The only protection available is a 7.5t weight limit on the Cold Ash Hill/Hermitage Road/Red Shute Hill. Traffic was running at such a speed, that ten years ago a series of chicanes were installed to calm it. Routinely, indeed daily, our lanes and our critical artery are abused by heavy trucks that exceed the weight limits.

The bridge at the bottom of Red Shute Hill is set at an awkward angle, making it difficult for HGV vehicles. The splay from the junction of Long Lane (B4009) with Red Shute Hill is extremely difficult, due to the rise in the elevation of the road, looking towards Newbury. At rush hour time, this makes for mayhem and drivers take risks. Extra traffic is not needed, as at peak times it is already very intense.

The exit of the Red Shute Industrial Estate leads onto the exact spot on Red Shute Hill where water routinely accumulates. There have been a number of dangerous accidents there, due to ice.

St Marks School in Cold Ash is on a cramped site on Cold Ash Hill. I am working with the parish council, stakeholders (parents, teachers and neighbours) as to how best solve the problem of set down and pick up of children. Numerous arrangements have been tried, the number of health and safety incidents that have arisen is alarming, and none of the proposed traffic engineering remedies look feasible. The standard solutions offered by West Berks Council have not remedied the problem. Almost daily, cars seek ways out of the relentless queues that build up outside the school and gridlock the cross roads with The Ridge and Ashmore Green Road. Their solution is to drive up onto the pavement in order to pass the parked cars! Does Cold Ash need additional skip trucks along Cold Ash Hill/Hermitage Road/ Red Shute Hill? No. But they can legally drive along there? Yes, since they have the legal right of access to the site, despite the weight limit. **This is an accident waiting to happen and everyone is worried.**

### **Conclusion**

This application does not spell out the implications of what Harewood Recycling wishes to do. The case officer's provisos and the real size and nature of the business are not examined in sufficient detail to permit approval by committee members. The traffic, noise and potential vehicle contention on site is far higher than portrayed, by virtue of the cramped site and the real size and nature of this operation.

This operation is attracted to its location as a hub near to key routes and corridors. The size of its catchment area, 1017 square miles would suggest that it should be located on one of West Berks' designated sites.

St Mark's school is a huge safety issue.

### **Recommendations**

I ask committee members to refuse this application. If they are still minded to grant approval, I propose the following conditions on the operator:

- No skip trucks and exporter trucks to drive through Cold Ash, unless a skip truck is handling waste arising from Cold Ash ward;
- No shovel loading of waste within or out of the facility;
- Random checks by West Berks Council,
- Three strikes and Harewood Recycling should lose its licence.

Cllr Garth Simpson, Cold Ash Ward

20<sup>th</sup> January 2013

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