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15th June 2017

County Planning Team
West Sussex County Council
The Grange
Tower Street
Chichester
West Sussex
PO19 1RH

Dear Sir / Madam,

**HANSON QUARRY PRODUCTS EUROPE LIMITED: AGGREGATE BAGGING OPERATION AT SOLENT WHARF, BASIN ROAD SOUTH, SHOREHAM, BN41 1WF.**

**PLANNING APPLICATION SUBMITTED UNDER SECTION 73 OF THE TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED) TO CONTINUE THE DEVELOPMENT AT VARIANCE TO CONDITION 5 ATTACHED TO PLANNING PERMISSION SW/40/03.**

**Introduction**

On behalf of our client, Hanson Quarry Products Europe Limited (Hanson), please find enclosed a planning application submitted via the online planning portal (ref. **PP-06054584**), which relates to a proposed change to the operating hours of the existing aggregate bagging operation at Hanson's Shoreham depot.

The planning application comprises:

- this covering letter as supporting statement;
- completed application form and certificates;
- Site Location Plan (ref. 60522086.SHW.001); and
- approved Plan No.2 - Aggregate Bagging Facility Ownership and Application Boundaries.

The planning application fee of £195 has been paid to the Council via BACS payment.

**Background**

Hanson is a long established UK aggregates and materials business. The Company continues to supply construction materials to many general construction and iconic public and private building projects.

Hanson carries out its operations in the UK in accordance with a number of accredited management systems, including BES 6001 (Framework Standard for the Responsible Sourcing of Construction Products).

The aggregate bagging operation at Shoreham has been operational for 13 years. The site is on a relatively small scale but comprises one vital component in the supply of aggregates to the building and construction sector in the south east of England.

The operation involves the loading of processed (washed, screened and graded marine dredged aggregate landed at the adjacent wharf) into hoppers and the automated loading of aggregate bags for distribution to builder's merchants and the DIY trade. The main loading operation takes place in a single storey prefabricated steel workshop type building.

The Hanson operation employees 7 full time staff a number of others in downstream related activities.

**Site Setting**

The site is located within a well-established marine aggregates wharf owned by Shoreham Port Authority and operated by Tarmac. The site itself is sub-let to Hanson to operate the aggregate bagging operation and is surrounded by a range of industrial uses including an aggregate processing plant (operated by Tarmac), the Scottish Power Shoreham power station, other building supply firms and distributors.

Shoreham Harbour lies to the north and Basin Road South to the south.

The wharf is well situated in proximity to the primary road network, accessed directly off Basin Road South.

Hanson HGVs access the primary road network using the A293, A270 and A27 Shoreham bypass, thus avoiding the A259 Brighton Road where it passes Shoreham Lighthouse.

The planning permission boundary is shown on approved PLAN No. 2 which accompanies this planning application.

There are no sensitive receptors in close proximity to the wharf (land afforded environmental protection or residential properties). The nearest residential properties are located over 220m to the north, on the northern side of Shoreham Harbour and north of the A259. Other residential properties in the vicinity of the development are located on Basin Road South to the east.

The site is in keeping with buildings and other industrial operations within the wider area. There are no public rights of way within, or in close proximity.

**Planning History**

Planning permission SW/40/03 was granted by West Sussex County Council (WSCC) on 17th March 2004 for the:

"*Development of aggregate bagging operation at Solent Wharf, Basin Road South, Shoreham-by-Sea, West Sussex.*"

A copy of the planning permission is appended to this application (provided in Annex 1).

The planning permission is subject to nine conditions. Condition 5 relates to operational hours and states:

*"None of the operations authorised or required under this permission shall take place outside the hours of:*

- *0700 to 1900 from Monday to Friday;*
- *0700 to 1300 on Saturdays;*

*And no works, including maintenance, shall take place on Sundays and Public Holidays."*

**The Proposal**

Hanson is submitting a planning application to WSCC in accordance with Section 73 of the Town and Country Planning Act 1990 (as amended) to continue the aggregate bagging operation at variance to Condition 5 attached to planning permission SW/40/03.

Hanson is seeking to amend the wording of Condition 5 to state:

*"None of the operations authorised or required under this permission shall take place outside the hours of:*

- ***0600 to 1800** from Monday to Friday;*
- *0700 to 1300 on Saturdays;*

*And no works, including maintenance, shall take place on Sundays or Public Holidays."*

The need for the proposed change arises from an increase in market demand, led by the continued recovery of the building trade since the recession in 2007-09. A number of schemes require early morning delivery and therefore it is proposed to begin operations at the site 1 hour earlier than currently approved Monday to Friday (at 0600) to meet delivery timescales and avoiding rush hour traffic.

If the proposed development is granted planning permission, Hanson is proposing an earlier closing time of 1800 Monday to Friday in order to maintain a 12 hour working day.

The site will continue to adhere to the current hours of operation on Saturdays (0700-1300) and no works will take place on Sundays or Public Holidays.

No other changes to the existing conditions are proposed.

**Planning Policy**

As highlighted above, the proposal will help to ensure the continued economic viability and sustainability of the existing operation. The planning policy review below seeks to demonstrate how this accords with the adopted development plan and relevant material considerations.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states: *"if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".*

The 'material considerations' referred to include national planning policies (mainly published in the form of the National Planning Policy Framework (NPPF) and the relevant Planning Practice Guidance (PPG)) and emerging local planning policies and evidential material, including neighbourhood planning.

Development Plan

The relevant development plan documents (DPDs) are the:

- saved policies of the WSCC Minerals Local Plan (MLP) (adopted July 2003); and
- saved policies of the Adur District Local Plan (adopted 1996).

WSCC Minerals Local Plan

The relevant WSCC MLP saved policies are considered to be: Policy 40 (Wharfage); and Policy 63 (Hours of Work).

The site is also identified on a safeguarding map issued by WSCC as part of the Shoreham Safeguarded Mineral Wharves Site.

Adur District Council Local Plan

The relevant Adur District Local Plan (ADLP) saved policies are considered to be: Policy AG1 (Location of Development); Policy AP3 (Areas at Risk from Flooding); Policy AP7 (Minimising Pollution); Policies AE7, AE8 and AE9 (Shoreham Harbour); and Policy AT3 (Access to Shoreham Harbour).

NPPF

The NPPF sets out a presumption in favour of sustainable development which the Government expects to be a "*golden thread*" through all plan making and planning decisions. The NPPF seeks to support growth and makes clear that sustainable investment should not be over burdened by the combined requirements of policy expectations; rather planning policies should recognise and seek to address potential barriers to investment.

Paragraphs 18 to 219 of the NPPF constitute the Government's view of what sustainable development means in practice for the planning system; policies are set out in thirteen chapters.

Chapter 1 'Building a strong, competitive economy' confirms that the Government is committed to securing economic growth to create jobs and prosperity. Paragraph 19 sets out the requirement for the planning system to do *"everything it can"* to support sustainable economic growth, and for local authorities to "*plan proactively to meet the needs of business*" and support an economy fit for the 21st century.

Within Chapter 13 'Minerals', specifically relating to wharfage, paragraph 143 requires LPAs to *"safeguard existing wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, including recycled, secondary and marine-dredged materials".*

Emerging Plans / Neighbourhood Plans

The relevant emerging WSCC DPD is the Joint Minerals Local Plan being prepared jointly by WSCC and the South Downs National Park Authority; public examination of the Proposed Submission Draft is expected to take place between July and October 2017.

The relevant emerging Adur District Council DPD is the new Adur Local Plan. Amendments to the Proposed Submission Adur Local Plan were formally published between March and May 2016; submission to the Secretary of State is expected to be undertaken in 2017.

Another relevant emerging planning document is the Shoreham Harbour Joint Area Action Plan being produced by the Shoreham Harbour Regeneration Partnership (consisting of the local planning authorities of Adur District Council, Brighton & Hove City Council and West Sussex County Council, working with Shoreham Port Authority). The document will provide a strategy to help deliver regeneration and associated infrastructure at Shoreham Harbour and a revised draft was published for consultation in December 2016. The site is identified within Character Area 1: South Quayside.

There are no designated or proposed Neighbourhood Areas or Neighbourhood Plans in preparation that are relevant to the proposal.

Conclusion

With reference to the relevant planning policies identified above, it is considered that the proposal accords with the requirements of the development plan and material considerations in that:

- it is considered an appropriate minerals related development located within an established, safeguarded marine aggregate wharf;
- the overall total operating hours of the facility will remain a 12 hour working day;
- the proposal will not result in pollution to air, water or land and will not result in significant adverse environmental effects and the proposal will not increase flood risk either on or in the local vicinity;
- the proposal will not affect the existing port related activities undertaken at Shoreham Port; and
- it will ensure the continued effective operation of an important established economic and industrial site, and it will support sustainable economic growth in the region.

It is considered that the proposal constitutes sustainable development (as defined by the NPPF) and accords with the development plan; therefore, it benefits from the NPPF presumption in favour of sustainable development and thus can be approved without delay.

**Environmental & Amenity Issues**

It is not considered that the proposal will result in any significant environmental or amenity issues, because:

- the bagging operation is located within an established wharf facility with no close-by sensitive environmental receptors or residential properties;
- the site is relatively small scale and situated within established surrounding industrial uses;
- the site benefits from good and direct access to the primary road network and the proposal will not change the existing vehicle numbers or established vehicle routeing;
- the bagging operation takes places within a building; it is essentially a low-noise industrial operation with no wider effects;
- the bagging operation has been undertaken at the site for 13 years with no record of complaints relating to the operation.

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**Closure**

The operation of the aggregate bagging facility at Shoreham is long established and fundamental to the existing Hanson business in the south east of England. The proposed change in operating hours is required to enable Hanson to meet market requirements, avoid the morning rush hour working period and to effectively serve its customer base. The proposal has been assessed and is considered to accord with the development plan and material considerations. It is not likely to result in any significant environmental or amenity issues.

We trust the enclosed information is satisfactory in order to determine the application. However, please do not hesitate to contact me should you require anything further.

Yours faithfully
for **AECOM Infrastructure & Environment UK Ltd**

[redacted]

Chris Nicoll
Principal Planner (Minerals & Waste)

[redacted]

Cc: Joel Morris, Hanson

**ANNEX 1 - Planning Permission WSCC/020/16/SW**