SUPPORTING PLANNING STATEMENT

West Sussex County Council



Bryant Recycling Ltd, Unit 1, Marlborough Business Centre, Marlborough Road, Lancing, BN15 8TP.

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SUPPORTING PLANNING STATEMENT
Planning Application – Change of Use for a proposed metal recycling site and lead acid battery storage site

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Section 1

Introduction and Background

This planning application is being made to regularise the activities of a metal recycling facility that is proposed by Bryant Recycling from late May 2012, at Unit 1 Marlborough Business Centre, Marlborough Road, Lancing, BN15 8TP.

The operations are due to commence at the site late May 2012. The unit is currently controlled under existing B2 planning uses.

An Environmental Permit required under the Environmental Permit Regulations[1] is also currently being sought for the operation with the Environment Agency.

Bryant Recycling Ltd was established in 2008 as a cable recycling business working out of a unit on the Northbrook trading estate in Worthing. The business quickly diversified into all non ferrous and ferrous metals and the collecting of lead acid batteries. The business moved to the Lancing area in 2009 and with the continued growth of the business, the business now requires another local site to continue servicing the existing customers from the Lancing area.

Bryant Recycling have been ISO9001 and ISO14001 registered since 2008 with accreditation body Certified Quality Systems Ltd. They are also members of the British Metals Recycling Association and Road Hauliers Association. Further details on the company can be found at www.bryantrecycling.co.uk

Bryant Recycling are committed to the environment and the waste hierarchy and are therefore driving their business to providing recycling solutions in the UK. The fast growth of the company demonstrates the demand for the recycling service and the reliable professional service provided to the customers.

The site has been chosen as an ideal location to accept, sort and store metal waste. The business has a 100% recycling rate and it strongly enforces that no waste is sent to landfill or other disposal routes. Although economic value of metal does deter the disposal of metal, the business works tirelessly to ensure the staff maximise recycling at the site.

It is proposed that the site will operate with 8 full time employees and it is expected that there will be every opportunity for future employment growth.

Waste materials will arrive on site via Bryant Recycling owned vehicles and via 3rd party vehicles. Separated recyclables are removed from site via 3rd party vehicles. The vehicles range from cars, vans, LGV and HGV's.

[1] Environmental Permitting (England and Wales) Regulations 2010 (SI 2010 No 675)

Section 2

Site Description and Application Proposals

The application site, comprising in total 1136m^2, is situated on Marlborough Road which is a purpose built industrial area.

The site will be performing a treatment activity of bulking, sorting, grading and separation of non ferrous and ferrous metals and the storage of lead acid batteries. Please see the flow chart at Annex 1 below which shows the existing flow of waste through the site.

The building will be used for the storage, transfer and sorting of ferrous and non-ferrous metals and lead acid batteries and transferred off site for onward resale.

The non-ferrous metal will be treated on site, please see Lancing Equipment List - Annex 2 (separate document) for a list of equipment used. The lead acid batteries do not undergo any treatment on site, they are transferred into storage boxes and then stored prior to onward transfer. The maximum amount of lead acid batteries stored on site at any time is 150 tonnes.

The site will be developed to receive up to 75,000 tonnes of recyclable material per year. The recyclables will be collected and delivered in from both household and industrial premises and then sold to metal reprocessors and battery treatment sites. The shape of the building allows for the majority of the material to be handled and stored inside, however there will be low volumes of outside storage of recyclables and empty skips. Any outside storage will be controlled by the Environmental Permit and measures will be implemented to minimise any adverse environmental impact.

Operational production hours are 7.00 to 20.00 hours Monday to Friday and 07.00 to 15.00 hours Saturday. There will be no working on Sundays or Bank Holidays.

Recyclable material is received via Marlborough Road[2]. All waste received is weighed and duty of care paperwork processed. The recyclable material is then transferred into the building for treatment or storage as necessary. The material is then loaded onto articulated or tipper vehicles for onwards transportation to a number of reprocessors in the UK, for further reprocessing. The material will again be weighed upon departure and relevant duty of care paperwork processed.

It is proposed that the vehicle movements will be:

- Staff and visitors: 10 in and 10 out in any 24 hours
- LGV vehicle or van movements: 40 in and 40 out in any 24 hours
- HGV vehicle movements: 10 in and 10 out in any 24 hours

The operation on the site consists of shredding, shearing, baling, compacting, crushing, granulating and cutting of ferrous metals or alloys and non-ferrous metals into different components for recovery. The equipment used on site is to continue the company's commitment to the environment by further treatment of the waste metals to maximise the payload of onward transportation. There shall be no treatment of lead acid batteries on site. Over the next 5 years the site will build the business with the existing equipment to make them more efficient and to

[2] Shown on Site Location Plan – drawing no.IMBP-SP

recover more material with the aim to achieve the throughput which has been applied for.

Bryant Recycling operates to both ISO9001:2000 and ISO14001 standard and a list of controlled documents are in place to monitor and control business operations, duty of care requirements and environmental monitoring.

The site will be used to enable waste to be treated inside the building. This will help any emissions that may result to be controlled when the material is stored.

Waste Types

The business operation is the handling of metal and lead acid battery waste. The waste types are listed by EWC codes below.

EWC Codes	Waste Types
020110	Waste metal
120101	Ferrous metal filings and turnings
120103	Non ferrous metal filings and turnings
150104, 200140	Metallic packaging
160117, 191202	Ferrous metal
160118, 191203	Non ferrous metal
160122	Discarded components not otherwise specified
170401	Copper, bronze, brass
170402	Aluminium
170403	Lead
170404	Zinc
170405	Iron and steel
170406	Tin
170407	Mixed metals
170411	Cables other than those mentioned in 170410
190102	Ferrous materials removed from bottom ash
191001	Iron and steel waste
191002	Non ferrous waste
200140	Metals
160601*	Lead batteries
200133*	Batteries and accumulators included 160601, 160602 or 160603 and unsorted batteries and accumulators containing these batteries
200134	Batteries and accumulators other than those mentioned in 200133

Section 3

Planning Policy Background and Government Policy

National Planning Policy Guidance

National Planning Policy Guidance Planning Policy Statement 1: Delivering Sustainable Development

Paragraph 4 of PPS1 sets out the Government's four aims for sustainable development, one of which is the maintenance of high and stable levels of economic growth and employment. In considering sustainable economic development Paragraph 23 states that the Government is committed to promoting a strong, stable and productive economy that aims to bring jobs and prosperity for all. Paragraph 23 continues that planning authorities should consider a number of aspects in relation to this, including recognising that economic development can deliver environmental and social benefits: providing for improved productivity, choice and competition; and recognising that all local economics are subject to change and as such planning authorities should be sensitive to these changes and the implications for development and growth.

Planning Policy Statement 10: Planning for Sustainable Waste Management

This national policy guidance is of particular relevance to the application proposals as it involves the use of land for storing and treating waste materials for the purpose of processing and sorting recyclable material as a potential product.

This guidance note clearly sets out that the overall objective of Government policy on waste is to protect the environment by producing less waste and by using it as a resource wherever possible. Through more sustainable waste management; moving the management of waste up the 'waste hierarchy' of reduction, reuse, recycling and disposal; using waste as a source of energy; and only disposing as a last resort, the Government aims to break the link between economic growth and the environmental impact of waste.

Planning Policy Statement 4: Planning for Prosperous Economies

In terms of decision making policies, Policy EC12 notes that local planning authorities should adopt a positive and constructive approach towards planning applications for economic development in both urban and rural areas. Where a planning application for economic development is in accordance with the relevant development plan it should normally be approved. It is considered that this application is in accordance with the Development Plan. In determining planning applications for economic development (other than main town centre uses) local planning authorities should consider proposals favourably unless there is good reason to believe that social, economic and/or environmental costs of the development are likely to outweigh the benefits. It is considered that there are no social, economic or environmental issues that outweigh the benefits of these proposals for a locally established business. Indeed, rather than there being an adverse economic issue the proposals will continue to bring economic benefit, including the potential for new job opportunities in the future.

Government Waste Policy 2011

The Government Waste Review released June 2011 sets out a list of priorities including:

- Consulting on introducing a landfill ban on metals
- Accelerating recycling
- Delivering the waste hierarchy
- Consulting on increased recycling targets to 2017
- Driving innovation in the waste and recycling sector

This has particularly relevance to Bryant Recycling's site as the Government would need sites to manage the recycling of the metal as producers need to find alternative operations to landfill. The Bryant Recycling site is exactly the site that would be involved in supporting this change.

Section 4

Design and Access Statement

Overview

This Design and Access Statement has been prepared by Blueprint and 360 Environmental on behalf of Bryant Recycling. It supports the planning application for the change of use of the land as a metal recycling yard. It should be read in conjunction with the application drawings produced by Blueprint.

The Site, Physical Context of the Surrounding Area

The application site comprises 1136m^3 of industrial land. The land is part of an existing industrial estate and the surrounding area is industrialised. The site is accessed via Marlborough Road and has easy access to the A27. The application site is surrounded by industrial uses.

Design Policy Context

Security is a big issue for metal recycling sites and as such measures have to be taken to protect the site and materials on the site.

Traffic Movements

It is proposed that the vehicle movements will be:

- Staff and visitors: 10 in and 10 out in any 24 hours
- LGV vehicle or van movements: 40 in and 40 out in any 24 hours
- HGV vehicle movements: 10 in and 10 out in any 24 hours

Flood Lighting

There are existing flood lights fixed onto the building which are on dawn to dusk which point directly onto the site. The lights will only be used at night and in winter during operating hours.

CCTV Poles

There are wall mounted domed CCTV cameras on the building currently. These positions are not proposed to be amended.

Access

The site has an existing galvanised palisade fence around the property and a gated entrance at either corner of the property. Please see the Site Location Plan for illustration.

Equipment

Please see the document Lancing Equipment List for a full list of equipment which will be used on site.

Hours of Operation

Operational production hours are 7.00 to 20.00 Monday to Friday and 07.00 to 15.00 Saturday. There will be no working on Sundays or Bank Holidays

Car Parking

The location of car parking is shown on the Site Location Plan. Provision is made for 5 spaces which are adequate for company employees, particularly as car sharing takes place and some cycle to work.

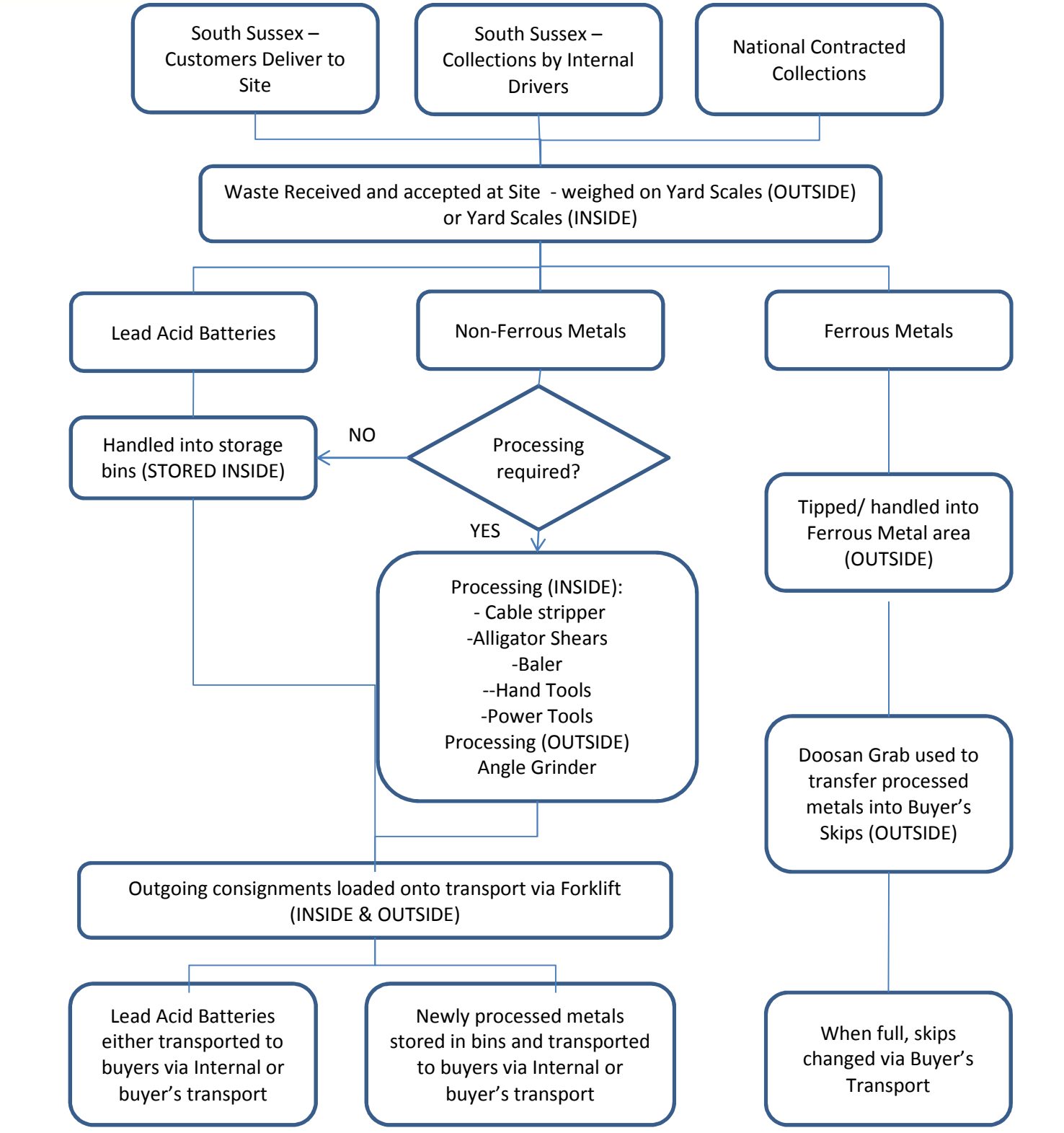
Section 5

Summary

Bryant Recycling has been operating since 2008 and has built up a very good reputation in that time. Whilst this is a new site for Bryant Recycling, it will be operated with the same professionalism as their existing sites in Lancing and Crawley. Bryant Recycling has a positive relationship with the Environment Agency and can provide evidence of this if required.

Consistent with the provisions of national government planning guidance contained within PPS10, it has been demonstrated that the application proposal will ensure the waste management facility continues to apply the 'waste hierarchy', increasing the level of recycling, thus supporting the priorities of the Government Waste Review.

Annex 1



NOTE: If Lead Acid Batteries, Ferrous and Non-Ferrous Metals are received on site already within Storage Bins or Pallets, Forklift Vehicles will be used to move the load

NOTE: Once metals have been processed and placed into storage containers, Storage containers may be located both inside and outside. Empty storage containers may also be stored outside.