

FRAMFIELD PARISH COUNCIL

Minutes of a Planning Committee Meeting held on Tuesday, 26 March 2019, at 6.15 pm in the Memorial Hall, Framfield

Present: Committee Members: Keith Brandon (Chairman), Peter Friend (Vice Chairman), Tony Hall, Maria Naylor and Sam Sharples.
In attendance: Ann Newton (Parish Clerk).
Public: Thirty.

At the meeting, the order of the items on the agenda may be varied in line with public speaking. However, the minutes are detailed in the order of the agenda.

1. Apologies.

There were none.

2. Declarations of Interest.

Councillors to give notice of declarations of personal, prejudicial and pecuniary interests in respect of items on the agenda. There were none.

3. Minutes of the Last Meeting for Approval.

It was agreed that the minutes of the meeting held on 29 January 2019 plus the delegated comments for February and March 2019 having been circulated, be approved, adopted and signed as a correct record. (PF/KB).

4. Planning applications for consideration

The order of the applications may be changed in line with those with public speakers but the minutes are detailed in the order of the agenda.

- **WD/818/CM - TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND) ORDER 2015 - Change of use of land and operation of an end-of-life tyre recycling facility comprising the shredding, colouring and baling for recovery, together with enabling works.
Squires Farm Industrial Estate, Palehouse Common, Framfield, TN22 5RB.**

The many residents present voiced their strong objections to the proposals.

The Parish Council STRONGLY OBJECTS to this application. The Design and access statement refers to “appropriate transport links requiring little change” yet there is no reference to what changes are required. However, whilst the site is an industrial estate location, it is of small-scale operations resulting in lower traffic movements and smaller vehicles than average industrial estates. The site is located in an area where the Parish Council are constantly petitioning the police and ESCC due to inappropriate large vehicles (HGV’s) that travel through the back lanes and Palehouse Common, instead of using the B2192. This operation will undoubtedly introduce a large amount of HGV traffic above and beyond the capacity for that of a rural parish.

Within ESCC’s Adopted Waste and Minerals Site plan that shows locations for waste development it refers to the site as an old farmstead with a number of ancient woodlands within 500 metres, a BAP Habitat and being an area that could cause issues such as disturbance or predation to birds, air quality and emission concerns in which suitable mitigation should be provided. The site has archaeological interest and any proposals should be subject to assessment detailing the significance of identified heritage assets and the potential for archaeological interest as well as an assessment of the likely impacts of heritage assets identified if there is going to be ground disturbance. By nature of the proposal there will undoubtedly be ground disturbance.

ESCC's Waste and Mineral's Site Plan 2017 is also incorrect/out dated in that it references a number of neighbouring houses that are 'distant' and 'screened'. It MUST be pointed out that the actual industrial site itself contains residential housing already, along with a Wealden District Council live application for further houses. The proposal will have a DETRIMENTAL effect on the amenity of residents and no mitigations can allow for residential properties directly adjacent to the proposal site. The Parish Council would have objected if there were no residential properties on the proposed site already as those that are surrounding it are not 'distant' but very close, with one being within 150 metres and many within 500 metres. The proposal will also have a detrimental effect on these residents. The Parish Council have and continually speak with the Industrial Estate proprietors and landlord due to current noise pollution affecting the day to day lives of local residents.

The proposal will offer no positive visual effect. It will provide minimal employment opportunities and in accordance with the aforementioned ESCC document, and without any mitigations it will have a negative effect on the biodiversity and geodiversity.

The Planning, Design and Access Statement says that the applicant needs to apply for an environmental permit. The government provides for a T8 waste exemption that allows the processing and storage of up to 60 tonnes of truck tyres or 40 tonnes of any other tyre over a 7-day period without such a permit. With the application proposal processing up to 10,000 tonnes per year, this is no small-scale operation. With up to 200 tonnes of waste being transported a week, the local highways will be affected by degradation at a much higher rate than its current use. The Parish Council already has multiple highway issues logged with ESCC, which have been outstanding for a long time. It concerns the Parish Council that the inevitable need for further road repairs on roads unsuitable for such high traffic and weight loading will go untreated as it has been made abundantly clear to the Parish Council that there is limited funding available for repairs, which is why there are multiple works still outstanding. 120 movements by large lorries will create extra burden on the Parish Council who receive several calls and correspondence weekly about traffic in this exact location that is impacting local residents. There will be no provision provided to the Parish Council and likely – the highways for this extra demand, leaving residents frustrated and roads in further disrepair.

The proposed site location within the industrial estate is at the very front and will be openly visible to the public. A recent Wealden District Council planning application that proposed works adjacent to this area was refused partly due to the impact of its visible nature. The proposal is situated at the south westerly end of the estate and has open views to the adjoining highway. This is also one of only two roads into the quaint and small hamlet of Palehouse Common that is just a short distance away. By approving this application, it is pushing the prominence of the estate further towards the highway creating a more urban landscape. Currently, other than a few minor issues, the industrial estate is relatively unobtrusive.

The proposed application is for operation 6 days a week. This is unacceptable as it will have a detrimental effect on the local residents and highways with extra noise and traffic created.

The proposal references employment for 7 staff, yet parking allocation has only been allocated 4 spaces. It is likely that all staff would drive to the location due to its rural setting and would therefore cause 'off site' parking issues, which has from time to time been an issue raised to the Parish Council.

The proposal in the Design and Access statement 2.4.10 is for a 2-metre-high close board fence. Whilst this will offer some noise attenuation, it will not be suitable for the noise levels created by the planned operations, especially as it is surrounded by open fields that will enhance any noise pollution. However, there is also a discrepancy as 4.3 states the close board fencing will be 2.5 metres high.

Section 4.5.1 states that a road sweeper will be hired if necessary, to clean site surfaces and/or the industrial estate road. Under what circumstances will this be established and how will it be monitored, to what standards?

It is disappointing to note that the applicant refers to (section 8.1 of Design and Access Statement) movements proposed, being lower than other uses in on the industrial estate. By virtue of the proposals involved in the application it will undoubtedly be the highest – not only on the industrial estate, but in the whole Parish, taking into account numbers and size of the vehicles. Of the same document, in section 9.2.1 it refers to the site as processing waste from Surrey. It would be extremely disappointing if the application is approved to process such waste within a small rural community that is from another county altogether.

9.7.2 refers to appropriate pollution measures being clearly demonstrated throughout the Design and Access Statement, yet it provides little to no comfort for the protection and prevention of pollution imposed on local residents and the parish, but merely references European legislation about waste management in general.

9.8.1 refers to 'no impact on wildlife habitats'. The immediate adjacent perimeter of the site which was recently part of a Wealden District Council planning application that was refused, highlighted the negative and detrimental effect that would have been imposed on Great Crested Newts. It is inevitable that their wildlife habitats would also extend into the site itself, and would encourage a full ecological appraisal be carried out should the council be minded to approve this application.

Section 10 refers to lighting of the site. The Parish Council are concerned about light pollution throughout the parish and this application is proposing lighting that will have an effect not only on other users of the industrial site, but two sides of the application site boundary which are hedgerows and open fields. Should the council be minded to approve this application, the Parish Council would like to see strict regulation and minimal lighting used to avoid the pollution and impact on surrounding residents and the wider ecological environment. Many animals will live in the hedgerows and it is important to protect them from obtrusive lighting.

It is interesting to note that the applicant has located the machinery required for the waste processing on the side of the site closest to the nearest residential property (northern side outside of the industrial estate). Whilst no location is suitable within the site as there are residential properties within the industrial estate, the question needs to be asked if the site has been appropriately laid out.

The Noise Impact Assessment is wholly inadequate. It references that no noise impact survey/monitoring was carried out. For an application that proposes the use of high noise machinery, it is ESSENTIAL that a full and thorough assessment is conducted, as the applicant has only paid lip service with this report.

Reference is made to current use on the industrial estate such as 'car repairs' and 'storage' with off-site operations such as 'tractors'. This presents NO comparison or reasoning to mitigations against noise produced by the proposed waste site. It is also highlighted in the same document that the B2192, some 300 metres from the site will produce greater noise than that from itself – The Parish Council fail to see how this can be so.

The table 6.1 is misleading, in that measurement references are assumptions based over very short operating periods of 'a few minutes in an hour' i.e. one hour of baling per week. For a site that is to process 10,000 tonnes per year, it will need full time operation, as will the other required machinery. The table presents a perception of lower noise levels because of inadequate calculations.

'Noise Management Controls' simply refers to 'writing in a diary'. This offers no comfort to a proposal that already has cause for concern.

NO formal noise mitigation by acoustic screening is proposed, and relies solely on a fence. This is completely unacceptable, as is this Noise Impact Assessment.

Mitigations are proposed in section 7 referring to heights no greater than 2 metres. Elsewhere in the application, equipment is referenced as being between 3 and 4 metres

high, so some noise pollution will inevitably have no protection at all from the inadequate proposal of fencing.

All of the probable noise level disturbance levels are calculated at medium or high, and the applicant has managed to reduce them to low or negligible with some inappropriate mitigations –

1. i.e. to reduce noise levels of small vehicles travelling to and from site, the mitigation is for them to arrive “marginally earlier than the main site operating hours”. This neither reduces noise levels, but prolong them and would be totally unmanageable.
2. i.e. to reduce noise levels of vehicles on site, visitors and site vehicles must ensure vehicles are “functioning suitable” and refer to operating with “silencers and moving parts being lubricated”. It is highly unlikely that all visitors to site are going to be told to ensure that their vehicles are adequately lubricated and have silencers, as this would be expected by current MOT requirements and vehicle maintenance.

The point to take from just two examples is that the applicant has not provided any tangible noise reduction mitigations that are suitable for such a site located in a rural area. The assessment carried out could be for any location and business, which is wholly inadequate for a business of this nature in rural countryside.

To conclude, the Parish Council strongly objects to this proposal for the reasons mentioned. It would like to highlight that whilst it sympathises for the need of such a business, it is disappointed that this site is being proposed when there are far more suitable locations within existing industrial estates throughout East Sussex or afar. To pick a very rural location within a parish and village setting is insensitive, and pays no regard for the residents and environment around it. Whilst it is an existing industrial estate, it is of small scale and with limited operations, including noise and environmental pollution which is supported by the fact that there are currently residential properties on the industrial estate itself.

The Parish Council listened to the concerns of local residents at a recent planning meeting and would like to emphasise to the ESCC planning committee to take all of their comments on board before making a decision. The Parish Council respectfully ask that this application is refused.

- **WD/2019/0086/F – Phased development of 4 no. private dwellings and 4 no. assisted living units. FRAMFIELD CHILDREN'S HOME, BLACKBOYS ROAD, FRAMFIELD, TN22 5PN.**

The applicant and agent both made a short presentation on the proposals. Several residents representing the other residents in attendance voiced their objections to the application.

The Parish Council objects to the application in its entirety. The houses proposed for along the front of the site will change the street scene with the massing and bulking which is not in-keeping with the other more individual properties in the vicinity. The site is also outside of the Core Area for development.

The Parish Council would have a mind to support the assisted living units but understands the concerns that residents have with regard to sufficient security for the clients living in the houses and also the residents in the surrounding area. The site needs to be secure from both perspectives.

5. Any Other Planning matters for reporting at the Discretion of the Chair.

To include any other planning applications which may arrive after the agenda has been published at the discretion of the Chairman in line with the terms of reference of the Committee.

7. Next Planning Committee Meeting – 14 May 2019.

Additional meetings will be called during the intervening period if the Chairman believes they are required otherwise comments are passed to the Planning Authority under the Parish Council's delegated procedure policy – available on the website, noticeboards and Parish Magazine.

The meeting closed at 7.10 pm.

AEN/04.04.2019

Circulation: Planning Committee.