

Draft Supplementary Planning Guidance for Hollingdean Depot/Abattoir

Draft Planning Brief

What is an SPG?

This planning brief constitutes 'supplementary planning guidance'. A Supplementary Planning Guidance Note (SPG) is one of the material considerations that can be taken into account when determining a planning application for development. It is intended to provide helpful guidance for a developer, consistent with the provisions of the relevant Local Plans. It should be read in conjunction with the Second Deposit Waste Local Plan for East Sussex and Brighton & Hove and the Second Deposit citywide Local Plan for Brighton & Hove.

(The weight to be accorded to this SPG Note will increase after it has been taken through a public consultation process and after any amendments have been subjected to a Council resolution.)

1. INTRODUCTION

1. The site known as the Hollingdean Depot/Abattoir site is identified in the Second Deposit East Sussex and Brighton & Hove Waste Local Plan for waste transfer and materials recovery facilities. It is also identified in the Second Deposit Brighton & Hove Local Plan for employment uses.

1.2 Brighton & Hove is a major area of population within the Waste Local Plan area and, in accordance with the principle of self-sufficiency has a responsibility to process locally as much of its own waste as possible. The development of a materials recovery facility (MRF) and waste transfer station (WTS) within Brighton & Hove is essential if increased targets for recycling/recovery are to be achieved and the city's waste is to be managed in a more sustainable way.

1.3 This planning brief sets out the Council's objectives for the site, provides information on the site and on site constraints, sets out the policy context and provides guidance on an acceptable development response. Its purpose is to assist and inform potential developers, businesses, the local community and any other stakeholders interested in the development of the Hollingdean Depot/Abattoir site.

1.4 Except where clearly set out otherwise, the planning brief deals with the Hollingdean Depot/Abattoir site including all land south of Hollingdean Lane as a single site. References to 'the site' therefore encompass all the constituent parts of the site as described below (see site plans appended to this brief).

2. OBJECTIVES

2.1 The Council's principal aims for development at Hollingdean are:

- to secure well designed, modern waste management facilities consistent with the Council's emerging waste and citywide local plan policies;
- to achieve the upgrading/rationalisation of key uses retained on the site;

- to facilitate/enable further opportunities to achieve waste related and/or industrial development on the site in accordance with emerging local plan policies and to meet local business needs; and
- to secure substantial environmental improvements.

2.2 The overall development will need to be of a high quality design, demonstrate it meets sustainability principles including the need to address and satisfy key transport issues.

3. SITE INFORMATION

Location of the site

3.1 This 4 hectare site is centrally located within the Brighton and Hove conurbation (see Appendix 1: Site location plan). Brighton & Hove City Council owns all the land identified by the local plan and waste local plan allocation.

3.2 Upper Hollingdean Road bounds the northern/eastern edge of the site with housing located on the opposite side of the road. Upper Hollingdean Road runs under a railway bridge (which has a 4.6m height restriction) at the south-east corner of the site. There is also a junction at this point with Hollingdean Lane. Current access to the Depot part of the site is from Upper Hollingdean Road. Routing is generally via the Vogue Gyratory.

3.3 To the west of the site, located at a significantly higher level, are two residential tower blocks (Dudenev Lodge and Nettleton Court), a primary school (Downs County Infant & Junior) and a cemetery (Jews' Burial Ground). Ditchling Road lies to the west of these uses.

3.4 The railway line between London Road and Moulsecoomb stations runs on an embankment which turns into a cutting along the southern edge of the site. To the south of the railway line is the Centenary Industrial Estate and residential areas.

3.5 Hollingdean Lane bisects the site from east to west, then follows the western side of the southern part of the site emerging on Ditchling Road (see detailed Site Plan at Appendix 2). Hollingdean Lane is not a public thoroughfare. Access to current uses south of Hollingdean Lane, is via Hollingdean Lane from its junction with Upper Hollingdean Road. Two privately owned residential properties lie at the western end of Hollingdean Lane.

3.6 The site is generally higher to the west of the Hollingdean Lane and slopes down from west to east.

3.7 Current uses include licensed waste transfer and light / general industrial uses.

History of Site

3.8 There is a long history of waste management within the Depot part of the site, dating back as far as the early nineteenth century. In 1886 the Corporation of Brighton opened a '*dust destructor*' to incinerate refuse to ashes, used as material for the construction of pavements and roads. The incineration of rubbish on the site continued up until 1952 after which rubbish was diverted to Sheepcote Valley until

tipping discontinued in 1982. The southern part of the site was formerly used as an abattoir and still retains many of the associated meat related businesses on the site.

3.9 In 1993 a Waste Disposal License was issued authorising the '*deposit of controlled waste and the use of plant and equipment for the processing, storage and transfer of controlled wastes*'. The waste license has been updated recently in relation to layout and operation of the site although the approved uses remain largely unchanged.

Areas covered by this brief

3.10 The site in total covers an area of approximately 4 hectares and comprises a number of distinct sections (see Appendix 2: Site plan showing sections of site).

A – Corporation Depot site (1.7ha)

3.11 The area marked 'A' on the site plan comprises the 'Hollingdean Depot' and has an area of 1.7 ha. The depot is largely occupied by the council's waste contractors and generates a significant amount of HGV traffic movements. Access to the depot is currently off the Upper Hollingdean Road.

3.12 The depot is licensed as a waste transfer station, although only part of the site is currently used for this purpose. The City Council's street cleansing operation is located onsite and waste from street cleaning, litter bins and flytipping is brought to the site for bulking/compacting and onward transfer. The council's fleet of street cleansing and refuse vehicles are also serviced, maintained and stored onsite. There is a lower level vehicle workshop for servicing/maintenance and surface parking for these vehicles when not in use. Up to 50 HGVs can be accommodated onsite plus smaller vehicles used for street cleaning. Facilities for the drivers of waste vehicles are provided onsite and include a staff canteen and a training centre. An administration block occupies the central part of the site. The depot employs approximately 350 staff.

3.13 In addition to the above, there are some private tenancies on the depot site including scaffolding, building construction and highways maintenance contractors. There is also a salt pile for winter gritting and winter storage for gritter vehicles.

3.14 There are some prominent views into the depot site from the two residential tower blocks to the west and from the housing located immediately to the north of the site on Upper Hollingdean Road.

B – Land south of Hollingdean Lane (1.4ha)

3.16 The area marked 'B' on the site plan comprises land south of Hollingdean Lane and has an area of 1.4 ha.

3.17 A number of industrial uses currently occupy the 'Ash Court' part of the site (site of the former Abattoir). These include some small meat operators, a double glazing manufacturer, a community recycling cooperative and a local tour bus company. The area has an industrial appearance but many of the buildings are poorly maintained. The area is well screened on its western and southern boundaries by the presence of established trees/vegetation.

3.18 A lorry park occupies the wedge shaped piece of land adjacent to Ash Court and is generally open hardstanding area being used as a temporary car park and for

some temporary storage. The council's pest control service occupies the building nearest the south-eastern corner of the site at the junction of Hollingdean Lane and Upper Hollingdean Road.

3.18 The southern boundary to this section of the overall site lies adjacent to the railway line between London Road and Moulsecomb stations.

C – Wholesale meat market and compound site (0.8ha).

3.19 The area marked 'C' on the site plan comprises the wholesale meat market and, at the eastern corner, what is known as the 'compound' area which together occupy an area of 0.8ha.

3.20 Visually, the area has an open perspective and there are prominent views into the area from surrounding residential areas; particularly housing lying immediately to the north of the site on Upper Hollingdean Road. There is a southern entrance to the meat market, off Hollingdean Lane but the main access is from Upper Hollingdean Road. The majority of the market area is used for vehicle parking. Like the depot, the meat market is also a significant generator of HGV traffic.

3.21 Adjacent to the wholesale meat market at the most easterly edge of the site near the junction with Upper Hollingdean Road and Hollingdean Lane is a small open area known as the 'compound' used in the past for temporary storage and parking. Again, the area has an open aspect and occupies a visually prominent corner of the site.

4. PLANNING POLICY FRAMEWORK

4.1 This SPG has been prepared within the wider context of national and regional planning guidance, and also the East Sussex and Brighton & Hove Structure Plan, the Second Deposit East Sussex and Brighton & Hove Waste Local Plan and the Second Deposit Brighton and Hove Local Plan.

PPG10 – Planning and Waste Management

4.2 Planning Policy Guidance Note 10, published in 1999 sets out government policy with regards to Planning and Waste Management. The guidance states that decisions relating to waste management should be based on the following key principles:-

- Best Practicable Environmental Option (BPEO)
- Regional Self Sufficiency
- Proximity Principle
- Waste Hierarchy

4.3 These key principles are detailed in Appendix 3

4.4 PPG10 sets out the general policy context and criteria for the siting of waste management facilities. It acknowledges that the 'identification of specific sites for development is the best way that the planning system can make provision for future waste management facilities' (paragraph 33, PPG10).

Regional Planning Guidance

4.5 The regional planning policy framework is currently set by RPG9, and covers the period up to 2016. It provides a spatial framework for other strategies and development programmes. The RPG identifies Brighton & Hove as a Priority Area for Economic Regeneration (PAER).

4.6 The RPG acknowledges that development pressures are high in the south-east and land resources are under great pressure to be developed. It is therefore important to ensure that the best use is made of brownfield sites. The re-use of developed land should take precedence over the release of new or greenfield land.

4.7 The RPG advocates regional self-sufficiency in terms of waste management. Policies state that waste planning authorities should aim to make provision for a sufficient range and number of facilities for the re-use, recovery and disposal of waste within their areas.

Regional Waste Management Strategy (Consultation Draft)

4.8 The draft Strategy sets out a regional planning framework covering the period to 2016 and beyond. The draft Strategy advocates a more sustainable and integrated approach to waste management based on the waste hierarchy, and promotes the principle of managing waste as a natural resource.

4.9 The draft Strategy reflects European and National policy, broadly following principles set out in the Government's Waste Strategy 2000. It focuses on regional issues and its policies extend beyond land use planning to include the promotion of waste minimisation, the role of marketing and advocacy and inter-regional links. It provides a regional context for the Waste Local Plan

Structure Plan

4.13 The East Sussex and Brighton & Hove Structure Plan (adopted December 1999) provides the strategic planning policy framework for this SPG.

4.14 The following policies are of particular relevance:- S1; S13; E1; E2; E3; E4; E5; E7; E8; TR1; TR2; TR3; TR30; EN11; EN12; EN15; EN16; EN31; W1; W2; W3; W4; W6; W8; W9; W13 and W19.

4.15 The waste management policies denoted by the prefix 'W' above, are particularly relevant to proposals for waste development at the Hollingdean site. These policies set out a sustainable approach to waste planning and the provision of waste facilities.

- W3 in particular, advocates the provision of facilities as close as possible to the point of origin of the waste arisings.
- W6 encourages the development of materials recycling facilities in appropriate locations,
- W13 supports proposals which would increase government targets for reuse and recycling of household, commercial and industrial waste.

4.16 Policies denoted by the prefix 'E' above are relevant to any proposals for employment development at Hollingdean:

- E1 encourages the provision of a high quality business environment and facilities which will attract inward investment and/or provide for the expansion of existing local businesses;
- E3 in particular supports proposals providing for the specific needs of small firms, including starter units;
- E5 generally resists the loss of industrial/commercial premises but proposals for waste management uses are an exception;
- E7 & E8 support the regeneration and environmental upgrading of existing industrial areas.

Full wording of the structure plan policies can be viewed on the East Sussex County Council website at:

www.eastsussexcc.gov.uk/env

Waste Local Plan (Second Deposit)

4.16 The Second Deposit East Sussex and Brighton & Hove Waste Local Plan provides the local planning framework for land use issues relating to waste development. The plan has been through a Public Inquiry and the inspector's report is expected Summer 2004.

4.17 The Hollingdean site is identified under policy WLP8 b in the Waste Local Plan, for a proposed materials recovery facility/waste transfer station. In addition, the site meets the requirements of WLP 13 (recycling, transfer and materials recovery facilities) which states that provision for such facilities will be supported if located within permitted or allocated waste management or industrial sites, on previously developed land and within close proximity to the sources of waste.

4.18 The strategic policies of WLP1 and WLP2 are also relevant and seek to ensure that all waste management proposals meet the following objectives:-

- the progressive reduction of waste disposed to land;
- the provision of an integrated waste management strategy;
- increasing recycling and recovery and achieving targets set by government and the waste plan;
- the treatment and disposal of the Plan area's waste arisings;
- minimising road traffic; and
- protecting the environment

4.19 Policies WLP35 – 40 set out the guiding principles for controlling all waste development. The impact of proposals on interests of acknowledged importance, including people, their communities, the environment, local amenity, local social and economic needs will need to be carefully considered when assessing all proposals for new waste development.

- WLP 35 covers general amenity considerations, including residential amenity, means of controlling noise, dust, litter, odours and emissions;
- WLP 36 covers transport considerations;
- WLP 37 and WLP 38 ensure the protection of water resources in terms of surface water run off and groundwater considerations;
- WLP 39 addresses design considerations;
- WLP 40 seeks provision for environmental improvements and other public benefits to offset any local adverse impacts.

Full wording of the Waste Local Plan policies can be viewed on the Brighton & Hove City Council website at: www.brighton-hove.gov.uk/waste

1995 Brighton Borough Plan

4.20 The adopted 1995 Brighton Borough Plan identifies part of the Hollingdean site under policy EP1 as suitable for industrial use. This allocation is carried forward more comprehensively under the Second Deposit Plan.

Brighton and Hove Local Plan (Second Deposit)

4.21 The Brighton & Hove Local Plan (second deposit) provides the most comprehensive local planning framework for this guidance note. The 'second deposit draft' version of the local plan has been through the public inquiry process and the inspector's report is expected at the end of 2003. Any policies quoted in this note may be amended in accordance with the inspector's advice and the latest situation should be checked by contacting the local development team in the Planning Strategy and Projects Group.

4.22 Any development proposals for the site will be considered within the overall context of the Brighton & Hove Local Plan (Second Deposit Draft).

4.23 Policies for transport, sustainability and design considerations in Chapters 1-3 of the local plan are generally applicable to all development proposals.

4.24 Under policy EM1 the Hollingdean site is allocated for a range of employment/business uses. The policy also recognises the Waste Local Plan allocation for the provision of materials recovery/ waste transfer facilities, general industrial uses, small car repair workshops and managed starter units.

4.25 Full wording of the Brighton & Hove Local Plan policies can be viewed on the Brighton & Hove website at: www.brighton-hove.gov.uk

5. FUTURE USES

Waste uses

5.1 As noted above, the site is identified in the Second Deposit Waste Local Plan for Materials Recovery/ Waste Transfer facilities (MRF/WTS) under policy WLP8. The following sections provide a description of these waste management activities.

Materials recovery facilities:

5.2 Materials recovery facilities (sometimes known as materials recycling facilities) sort and process materials for subsequent recycling. There are generally two types of MRF, those that receive source-segregated dry recyclable materials (eg. through a kerbside household/business collection system or from bring banks) known as 'clean' MRFs and those accepting unsegregated, mixed waste, which are known as 'dirty' or 'mixed waste' MRFs. The purpose of a MRF, whether clean or dirty is to further sort and segregate wastes and to bulk up the recyclable components, for onward transfer to a reprocessing plant where the recyclates are made into other marketable goods.

5.3 Typically, the types of 'dry' recyclable materials taken to a MRF include paper, cardboard, aluminium and steel cans, plastics, glass and textiles. Recovery rates at clean MRFs are typically 90% of incoming recyclables. The recovery of recyclable materials at a MRF is a key element of the City Council's approach to achieving the recycling targets set out in the government's waste strategy and those in the Waste Local Plan. It follows therefore that the Council would wish to see a clean MRF established at Hollingdean which would work in operation with a kerbside collection system to maximise recycling/recovery rates within the city.

5.4 MRFs require delivery, storage and parking areas and a sufficient area for a large building in which the sorting and grading processes can be undertaken. The capacity of the plant will generally determine the specific site requirements. Generally, at least 1 hectare is required. The sorting building itself will generally be of a warehouse/industrial appearance. Average heights for these buildings are 12-15 metres. It will contain an inside reception hall for deliveries, sufficient room for operations plus staff and visitor areas.

Waste transfer facilities:

5.5 The purpose of a waste transfer station is to receive collected waste arisings for subsequent bulking up before onward transfer to disposal, treatment or recycling facilities.

5.6 It is intended that the WTS facility at Hollingdean will receive the 'residual' element of waste not catered for by separate kerbside or bring bank collection systems. This residual waste will be bulked up for onward transfer to a final disposal facility thereby reducing the number of vehicle movements and distances involved in the overall collection/disposal process.

5.7 As with MRFs, WTSs can be visually prominent land uses, which involve the erection of a large industrial building for sorting, bulking and grading activities. The building requirements are generally less than that for a MRF but a WTS will similarly require areas for parking, delivery and storage.

Employment B1/B2 uses

5.8 Part of the site (that formerly known as the exhibition lorry park) is identified in the adopted 1995 Brighton Borough Plan for B2 general industrial uses (proposal EP1).

5.9 More recently, the Second Deposit Brighton & Hove Local Plan recognises the allocation in the waste local plan for MRF/WTS facilities but also indicates the site's suitability for a range of employment generating uses B1(b), (c) and B2 under policy EM1.

5.10 Given the urgent need for new waste management facilities in Brighton & Hove, the 'primary' allocation in planning terms is for the MRF/WTS facility. However, the allocation in EM1 recognises the industrial nature of the Hollingdean site (and of the proposed waste uses) and encourages the establishment of light/general industrial activities alongside the MRF/WTS. The schedule attached to policy EM1 in the Brighton & Hove Local Plan states that general industrial uses, small car workshops and managed starter units could be appropriate types of employment development.

5.11 It would be particularly advantageous if a recyclate reprocessing industry could be attracted to the site. Reprocessing facilities provide the essential link in an integrated waste management system and provide an outlet for the reprocessing of recycled materials. Co-located recycling and reprocessing industries also reduce the distance over which recyclates have to be transported for reprocessing.

5.12 Clearly, the amount and location of these uses will largely depend where the MRF/WTS is sited and what space becomes available through any redevelopment either of the site as a whole or any of its constituent parts.

6. PLANNING CONSIDERATIONS

6.1 There are a number of important planning considerations which any proposals for development at Hollingdean will need to fully address and satisfy.

6.1 Environment / Sustainability Considerations

Sustainability Considerations

6.1.1 In accordance with the Council's 'Sustainability Strategy', all new development within Brighton and Hove must be designed and located to reflect the aim of achieving sustainable development.

6.1.2 'Sustainable development' is most commonly defined by the *1987 Brundtland Report* definition as '*meeting the needs of the present without compromising the ability of future generations to meet their own needs*'.

6.1.3 One of the key objectives for land use planning identified in the Council's Sustainability Strategy is:

'to promote best sustainable practice in new development, with an emphasis on minimising the production of waste, whilst maximising energy efficiency, the use of renewable energy and opportunities for sustainable transport'.

6.1.4 The Transport, Sustainability and Design policies in Chapters 1-3 of the Brighton & Hove Local Plan will be particularly relevant in terms of determining development proposals for Hollingdean in this respect.

The need for an Environmental Assessment

6.1.5 All development proposals will have environmental impacts which need to be assessed in order to consider their acceptability and/or whether appropriate design/mitigation measures can be incorporated to offset any adverse effects.

6.1.6 Certain projects will, by their very scale and nature, require a formal Environmental Impact Assessment (EIA) to be carried out and an Environmental Statement (ES) to be submitted with a planning application. Other projects may require a formal EIA to be undertaken and an ES to be submitted depending on criteria set out in The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 and whether the development would be considered to have 'significant environmental effects'. Development proposals for Hollingdean will need to be considered under these Regulations to

determine whether there would be significant environmental effects. If this is the case then a formal EIA will be required and an ES will need to be submitted with any planning application.

6.1.7 If required for development at Hollingdean, the scope of matters needing to be addressed in an EIA will be set out by the council's planning officers. It is likely that such matters would include at least the following:

- Transport, traffic, access and highway matters - *assessed by a Transport Assessment (TA)*;
- Noise, dust (air quality) and vibration, *including potential amenity effects from project construction, vehicle movements and on-site operations*;
- Visual effects, *including the assessment of existing structures (both hard and soft), design of proposed new buildings, layout of site, proposed hard and soft landscaping*;
- Contaminated land issues, *including effects of construction on potentially contaminated land; disposal of waste material resulting from ground works; containment of pollution*;
- Pollution: *see above*.
- Policy context: *development plan, national guidance, best practice*.
- Ground and surface waters: *effects of potential pollution; mitigation measures; measures for sustainable containment and re-use*.
- Ecological issues: *survey to assess any potential for protected species or species of interest*.

6.1.8 Many of these matters are covered in more detail in further sections of this planning brief.

Ground / Surface water protection

6.1.9 The conservation and protection of water resources are important considerations. Groundwater resources are protected by the Environment Agency as Source Protection Zones (SPZ's). The Hollingdean site is defined by the Environment Agency as lying within a Zone 1 (inner protection zone) SPZ. Any proposed development of the site should not therefore adversely affect groundwater.

6.1.10 All developments require the consideration of surface water drainage. The sustainable management of surface water can be achieved through 'SUDS' (sustainable drainage systems). For sustainable drainage to be effectively implemented at the site, the concept needs to be incorporated into the overall design at the earliest stage possible. Further guidance on SUDs can be obtained from the Environment Agency.

Contaminated Land Issues

6.1.11 The Council is currently implementing its Contaminated Land Strategy and the Hollingdean site has not yet been identified as 'Contaminated Land' (as defined). However, due to the previous site history (abattoir, corporation depot, waste destructor, etc), any proposals for the development of the site would require further investigations. The Council's Pollution Control officer will advise on the detailed requirements and extent of any investigation which may require one or more of the following phases to be completed:

- Phase 1: Desktop Study and Report;

- Phase 2: Intrusive soil investigation & Report; and
- Phase 3: Remediation Plan, including measures to clean up any localised contamination prior to development commencing.

Education facility

6.1.12 The Council will seek the provision of an educational facility/ visitor centre to be provided as part of any MRF/WTS development on the site. The facility should be designed with the aim of increasing awareness of waste issues, and be accessible to a wide range of community groups. This accords with WLP40 Environmental improvements and other public benefits as cited in the Waste Local Plan.

6.2 Transport/traffic considerations

6.2.1 The site is well located in terms of the 'proximity principle', being located centrally within Brighton & Hove close to the sources of waste arisings. However, because the site is so centrally located and is close to residential areas, transport/traffic issues are key considerations in achieving a satisfactory scheme.

6.2.2 Consultation undertaken as part of the preparation of the Waste Local Plan, demonstrated a number of traffic-related local concerns regarding the identification of the Hollingdean site for waste related development:

- the capacity of the local road network to absorb further traffic generation (particularly further HGV movements),
- road safety issues;
- the adequacy of existing access arrangements to the site, particularly the A270 approach via Lewes Road, the Vogue Gyratory under the railway bridge; and
- how to avoid 'rat running' through local residential areas.

6.2.3 In accordance with Brighton & Hove Local Plan policy TR1, a Transport Assessment (TA) would be required to identify and assess all potential transport/traffic impacts associated with any major development at Hollingdean and the scope for moderating any adverse effects. It is likely that a TA would form part of any Environmental Impact Assessment (EIA) if this is required as part of a development proposal. The scope of the TA will be agreed through liaison with the council's Transport Planning Team and be prepared in accordance with appropriate policies and guidance including that contained within the East Sussex and Brighton & Hove Structure Plan, the Second Deposit Waste Local Plan, the Second Deposit Brighton & Hove Local Plan, the Local Transport Plan, The Road Safety Plan and IHT Guidelines for Traffic Impact Assessment.

6.2.4 The TA will typically require the following 'tests' to be satisfied:

- access arrangements must be adequate for the volume and nature of traffic generated by the proposal;
- there must be no unacceptable safety hazards for other road users, cyclists or pedestrians;
- traffic generation must not exceed the capacity of the local road network;
- there must be no unacceptable adverse impacts upon existing highway conditions in terms of traffic congestion and parking;

- adequate on-site arrangements for vehicle manoeuvring, parking and loading/unloading must be secured.

6.2.5 Existing uses at Hollingdean currently attract large numbers of HGV (Heavy Goods Vehicles) to the various constituent parts of the site. Consequently, the net effect of HGV movements associated with any proposed MRF/WTS development will depend on which existing uses are to be replaced. The net traffic impact will need to be determined at TA stage in terms of vehicle types as well as total numbers.

6.2.6 The site is accessible from Ditchling Road and Upper Hollingdean Road, both of which are identified as minor distributors in the Local Transport Plan. It is considered preferable for vehicular access to be provided from Upper Hollingdean Road for the following reasons:

- Upper Hollingdean Road has more direct access to Hollingdean Road and to the major distributor network;
- Ditchling Road runs close to a primary school and residential areas.

6.2.7 The TA should consider the relative merits of access points from Upper Hollingdean Road between its junctions with Hollingdean Lane and Hollingbury Road (including the junctions themselves), identify and justify the best point of access and develop proposals for the access and other off-site works required.

6.2.8 A new access should alleviate congestion and facilitate the efficient and safe movement of traffic in and around the site area. A one-way flow system is envisaged whereby arriving HGVs would enter the site at one entrance, deposit waste loads and/or collect waste loads for onward transport (either residual waste for disposal treatment or recyclates for further processing) and exit the site from a separate access point.

6.2.9 The TA will require applicants to demonstrate to what extent any potential adverse traffic impacts arising from the proposal can be mitigated, for example by imposing routing controls, securing highway improvements and road safety measures. Routing controls should as far as possible be achieved by enforcement rather than regulation alone. Where appropriate, the required improvements will be secured through planning conditions and/or legal agreements.

6.2.10 The TA should address the need for the use of sustainable modes of transport to be maximised and in particular should evaluate the need for a Travel Plan for employees at the site.

6.2.11 The TA should also demonstrate that consideration has been given to whether the site could be connected to the rail network via the disused siding, in accordance with Policies WLP 2 and WLP 4 of the East Sussex and Brighton & Hove Waste Local Plan.

6.3 Amenity considerations

6.3.1 Housing is the dominant land use surrounding the site. In accordance with B&HLP policy QD27 (protection of amenity) and Waste Local Plan policy WLP35 (general amenity considerations), residents will need to be protected from the most immediate and damaging effects of any waste development such as those resulting from noise, dust, odours, windblown litter and visual intrusion. Any such impacts and

their scope for mitigation will need to be addressed in relation both to the construction and operational phases of proposed development.

6.3.2 Given the current mix of industrial/waste uses on the site and the fact that many existing buildings have been poorly maintained, there is considerable potential to improve on the existing visual and amenity characteristics of the site as a whole.

6.3.3 A high standard of design and operational management will be required to overcome, minimise or reduce to an acceptable level potentially harmful amenity impacts.

6.3.4 The council will expect that mitigation measures include:

- dust and noise suppression techniques;
- enclosure of operations in a suitable building;
- soundproofing/insulation of buildings;
- appropriate landscaping and other visual screening measures, including the maintenance of existing screening;
- the control of operating hours on site;
- the control of numbers of vehicle movements to/from the site;
- the covering of waste, cleaning of site hardstandings and vehicles.

6.4 Design and landscaping considerations

6.4.1 The need for waste management/industrial uses to be primarily functional can result in unimaginative structures and poor layouts that require tree planting or other means of visual screening to make them visually acceptable.

6.4.2 Hollingdean is an urban site with a long established industrial character. Parts of the site now appear derelict and poorly maintained. There is considerable scope for a high quality and innovative design which will complement and utilise the existing topography of the site and its surroundings, incorporate existing landscape features, provide new landscaping treatment and achieve significant environmental improvements.

6.4.3 In accordance with the B&HLP policy QD1, a 'Design Statement' will be required for all major development proposals. The Design Statement for Hollingdean should explain how or why the design of any proposed development has been arrived at and should incorporate, as a minimum, information regarding the following:

- the scale, height and massing of development;
- permeability and legibility of proposed design;
- the treatment of levels;
- a landscape appraisal and landscaping treatment;
- architectural detailing;
- the type and quality of materials to be used;
- how sustainability issues have been addressed;
- visual interest

6.4.4 Waste Local Plan policy WLP39 will also be particularly relevant in terms of design considerations appropriate to waste development.

6.4.5 The differing site levels will need to be fully explored as they offer design opportunities in terms of minimising visual impacts, for example by siting the MRF/WTS buildings in less visually prominent locations. Differing site levels may also offer possibilities for maximising the development potential of parts of the site, for example by incorporating lower level parking/storage areas which are not only functional but also provide indirect screening.

6.4.6 A landscape appraisal of the site and its surroundings will be expected to identify opportunities for landscaping works. Off-site landscaping works may be required to help offset the impacts of waste/industrial development on the site itself. These might, for example, include:

- landscape treatment in the vicinity of the residential areas on the north side of Upper Hollingdean Road;
- landscape treatment/management along the railway embankment, contributing to the identified 'greenway' in this location;
- landscape treatment/management along Hollingdean Lane

6.4.7 The treatment of site boundaries will also be particularly important. The brick/flint wall running along the north-east boundary of the site provides a distinct hard urban edge to the site and provides a sense of 'containment' of activities. Ideally, the wall should be restored and retained as part of any new development.

6.4.8 Improvements to Hollingdean Lane will also be necessary in terms of improving accessibility to parts of the site both for vehicular movements and pedestrians. Lighting will therefore be an important consideration but it will also be necessary to ensure that external lighting does not adversely impact on amenity.

6.5 Ecology

6.5.1 Although the site is not identified in the local plan as having any intrinsic ecological value, new development offers the opportunity to enhance the site by incorporating nature conservation features appropriate to the location. It should be noted that the railway line which bounds the site to the south is part of the proposed Brighton & Hove 'Greenway' network. Development within the vicinity of such routes is expected to make an appropriate contribution to the objectives of the Greenway network. In terms of the site at Hollingdean, the council expects to see the incorporation of 'wildlife friendly' plants and shrubs in proposed landscaping designs and the provision of bird/bat boxes. Innovative designs could incorporate features such as extensive green roofs and water features. Such an approach is consistent with policies QD17 and QD19 in the Brighton & Hove Local Plan.

7. DEVELOPMENT RESPONSE

7.1 All development proposals will need to take account of the advice set out above in the 'Planning Considerations' section of this guidance.

7.2 In terms of the most appropriate siting for new MRF/WTS facilities, the analysis of planning issues given above points strongly towards the siting of these facilities to that part of the site lying south of Hollingdean Lane, ie. the area marked 'B' on the detailed site plan (Appendix 2).

7.3 The advantages of this location are as follows:

- this part of the site lies furthest from the residential areas which directly overlook the site (those lying immediately to the north and west of the site) and would allow a design scheme to minimise visual intrusion;
- substantial amenity benefits could be secured particularly in terms of improving the noise environment;
- the natural screening provided by the mature vegetation and trees lying along the western part of Hollingdean Lane and the railway line to the south of the site could be incorporated into a landscaping scheme as part of any proposed design;
- there would be the opportunity for the new waste facilities to work in conjunction with the depot facilities across Hollingdean Lane. For example, to utilise the depot for vehicle storage and enable drivers of vehicles to use depot facilities;
- new access arrangements would facilitate circulatory movements of vehicles in and around the site as a whole thereby avoiding congestion on Upper Hollingdean Rd; and
- it would also provide a development opportunity to rationalise current depot uses and redevelop these in conjunction with the MRF/WTS facility.

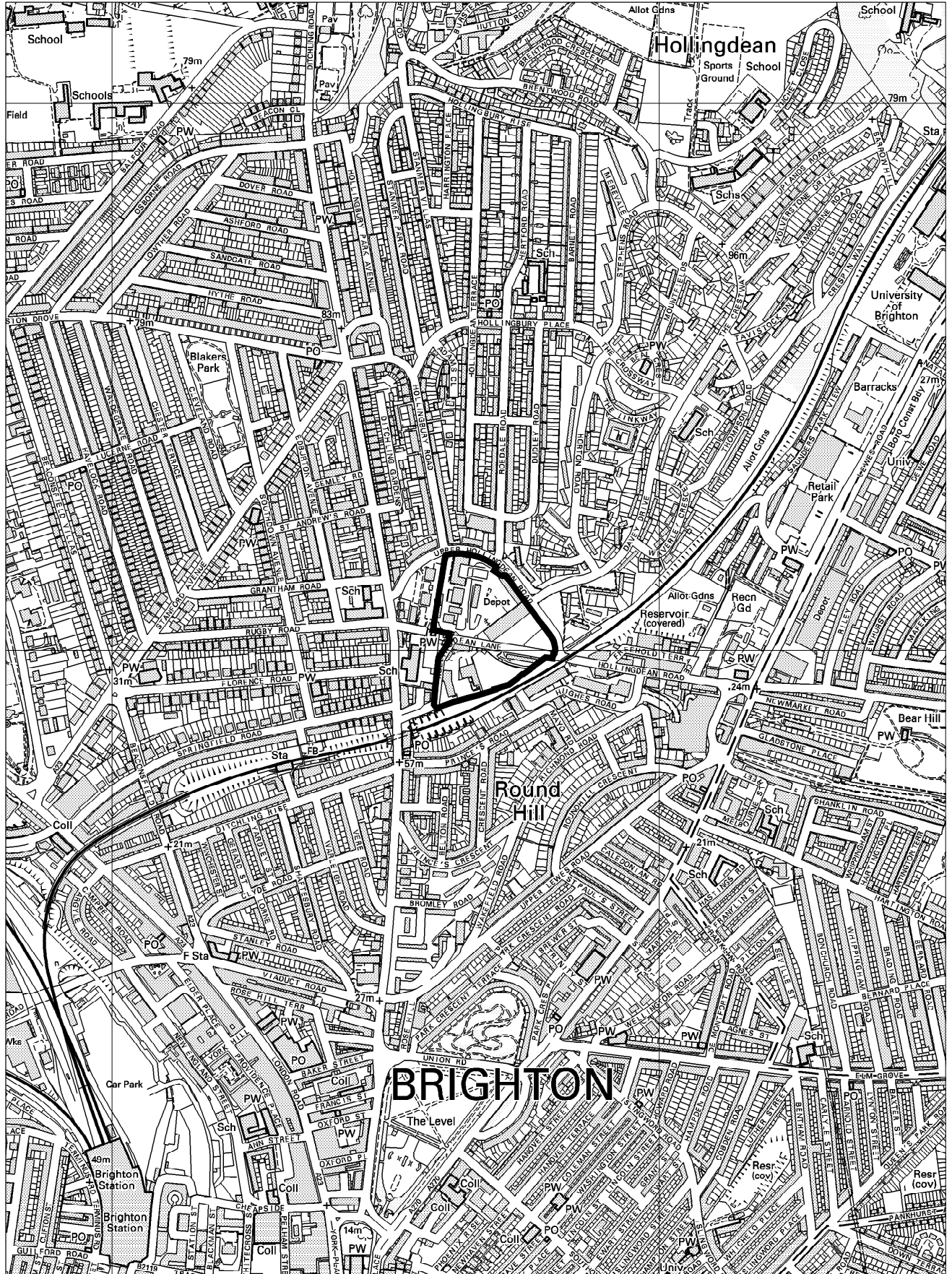
7.4 To achieve this option, would however mean that current uses on the Ash Court part of the site would have to be displaced. The existing Pest Control Council building would also need re-locating. The Council in its role as landlord is liaising with tenants on this part of the site and will attempt to try and find alternative business accommodation should this prove necessary where possible.

7.5 To minimise visual intrusion in overall terms, the preferred location for the siting of the MRF/WTS buildings would be the south-western section of this part of the site. This area has a less open aspect than the rest of the site and the scope for reducing views into the site is greatest here.

7.6 In terms of opportunities for new employment development, it is envisaged that any rationalisation and redevelopment of the depot part of the site would be likely to release some space for new employment activities in line with policy EM2 in the Second Deposit Brighton & Hove Local Plan. New employment uses could also be supported on other parts of the site, provided the waste-related uses are satisfactorily accommodated. The Council would wish to encourage high quality but affordable business space for local businesses.

APPENDICES:

- 1. *Site Location Plan;***
- 2. *Detailed Site Plan;***
- 3. *PPG10 Principles;***
- 4. *List of contacts***
- 5. *Bibliography***

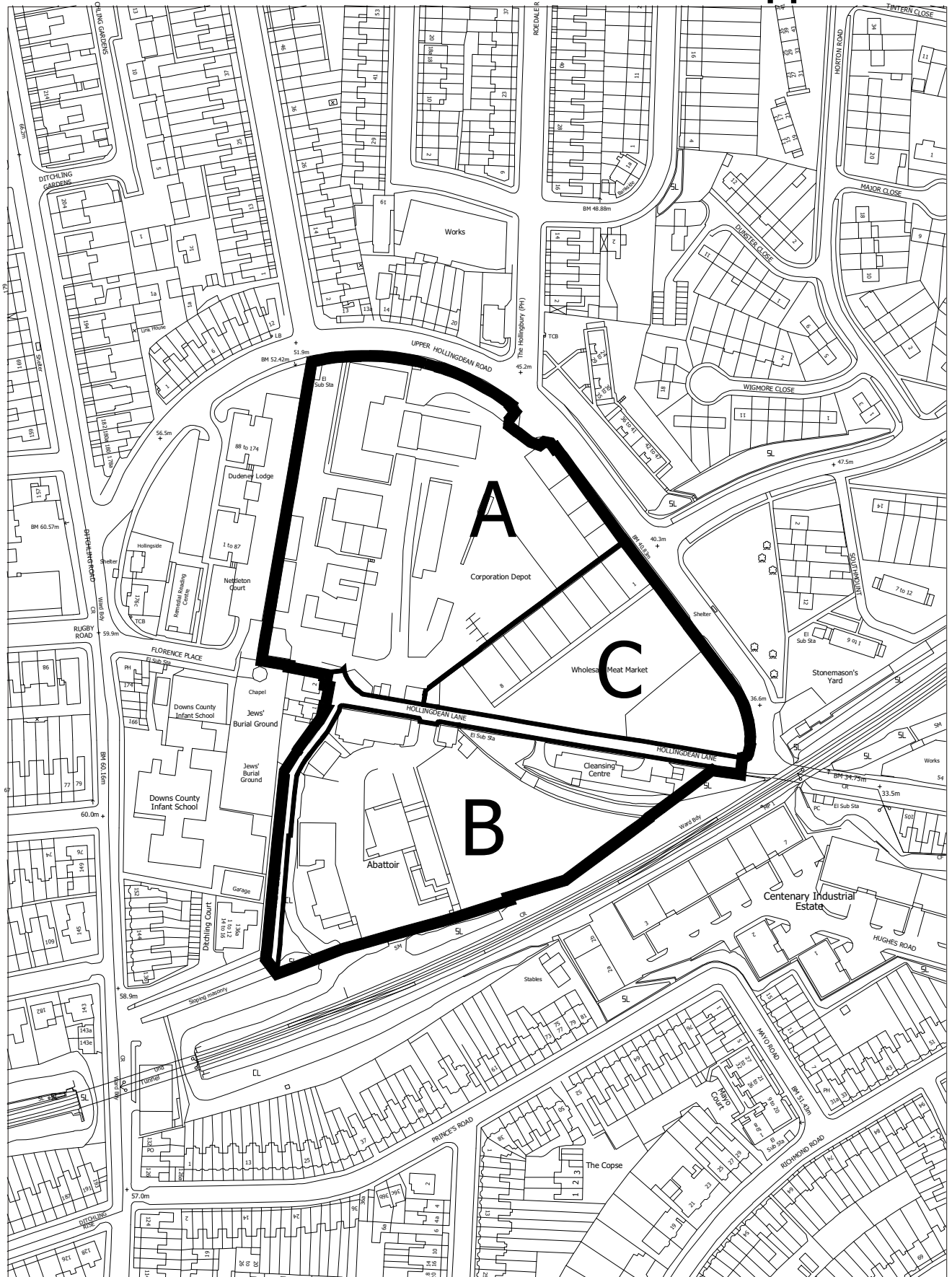


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Hollingdean Depot/Abattoir - Site Location Plan



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Brighton & Hove

Scale: 1:2500

Hollingdean Depot/Abattoir - Detailed Site Plan

PPG10 – Planning & Waste Management

Principles of Waste Management

a) Best Practicable Environmental Option (BPEO)

This has been defined by the Royal Commission on Environmental Pollution as “the outcome of a systematic consultative and decision making procedure which emphasises the protection and conservation of the environment across land, air and water. The BPEO procedure establishes for a given set of objectives, the option that provides the most benefits or the least damage to the environment, as a whole, at acceptable cost, in the long term as well as in the short term”

b) Regional Self Sufficiency

Most waste should be treated or disposed of within the region in which it is produced, Each region should provide for facilities with sufficient capacity to manage the quantity of waste expected to need to be dealt with in that area for at least 10 years. In some cases however it may be necessary to recognise units smaller than regions but larger than WPA's (*Waste Planning Authorities*). WPA's should make adequate provision in their development plans for any waste management facilities which may be needed, taking account of the advice of the Regional Planning Body for their area.

c) Proximity Principle

Waste should generally be managed as near as possible to its place of production, because transporting waste itself has an environmental impact.

d) Waste Hierarchy

This is a theoretical framework which acts as a guide to the waste management options which should be considered when assessing the BPEO.

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Appendix 5

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