

Planning Statement

Part change of use of a paper / card recycling (B2) facility to incorporate a waste transfer station (WTS) (*sui generis*) including:

- refuse-derived fuel (RDF) shredding;
- installation of 1 No. (10m x 5m) fabric canopy / bay;
- installation of new forecourt separator;

amendments to WTS building including replacement of 2 No. doors with rapid action doors, closure of 2 No. existing doorways and installation of new doorway with rapid action door; and

amendments to paper / card recycling building including replacement of 1 No. door with rapid action door

at

Pennine View Industrial Estate, Gelderd Road, Batley

on behalf of



by



February 2024

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Drawings

Site Location Plan	VEO-001-W D.001
Existing Site Layout	VES_TD_LEDHS_100_000
Proposed Site Layout	VES_TD_LEDHS_100_001
Proposed RDF Building Layout	VES_TD_LEDHS_100_002
Proposed Paper / Card Building Layout	VES_TD_LEDHS_100_003
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Proposed Elevations 3D Views	VES_TD_LEDHS_100_011 1 OF 2
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1 INTRODUCTION

1.1 Background

1.1.1 This Planning Statement has been prepared by Heaton's on behalf of Veolia ES (UK) Limited (Veolia) to support a planning application for a change of use of a paper and cardboard recycling depot to facilitate a Waste Transfer Station at Pennine View Industrial Estate, Batley, West Yorkshire.

1.1.2 The Site comprises three warehouse units, a fire water tank and pump house, a sprinkler room, disused office block, car parking and external concrete hardstanding yard. The proposed development seeks to establish a Waste Transfer Station (WTS) for residual waste streams within the central warehouse unit which is currently used for paper and cardboard recycling. Paper and cardboard recycling operations would be re-located to a smaller warehouse unit east of the central (main) unit. Use of the third warehouse unit to the south-west lies outside the scope of this application.

1.1.3 This Planning Statement considers the potential environmental effects of the proposed changes and outlines the main planning considerations for the proposed development.

1.1.4 This submission is accompanied by the following supporting documents/drawings:

- Site Location Plan (VEO-001-W D.001)
- Existing Site Layout (VES_TD_LEDHS_100_000)
- Proposed Site Layout (VES_TD_LEDHS_100_001)
- Existing Site Drainage (VES_TD_LEDHS_100_004)
- Proposed Site Drainage Modifications (VES_TD_LEDHS_100_007)
- Existing Elevations 3D Views (VES_TD_LEDHS_100_010 1 OF 2)
- Existing Elevations (VES_TD_LEDHS_100_010 2OF2)
- Proposed Elevations 3D Views (VES_TD_LEDHS_100_011 1 OF 2)
- Proposed Elevations (VES_TD_LEDHS_100_011 2OF2)

1.2 Applicant

- 1.2.1 Veolia are the UK leader in resource management, providing services across waste, water and energy management sectors. The company is committed to ecological transformation through preserving natural resources, protecting biodiversity, combating climate change and decreasing pollution.
- 1.2.2 The Company has over 85,000 customers in the recycling and waste management sector across the UK.
- 1.2.3 The Company added four sites to their portfolio in 2023, acquired from recycling and waste management company DS Smith, including Pennine View Industrial Estate.

2 SITE APPRAISAL

2.1 Site Location and Setting

2.1.1 Pennine View Industrial Estate is located within the north-eastern extent of Birstall, approximately 9.5km south-west of Leeds city centre. The Site is accessed off Pennine View to the south and an area of car parking can be accessed off Pheasant Drive to the east.

2.1.2 The Ordnance Survey (OS) grid reference for the Site is 423203 427166. The location of the Site is shown on Figure 1 below and on the Site Location Plan ref VEO-001-W D.001.

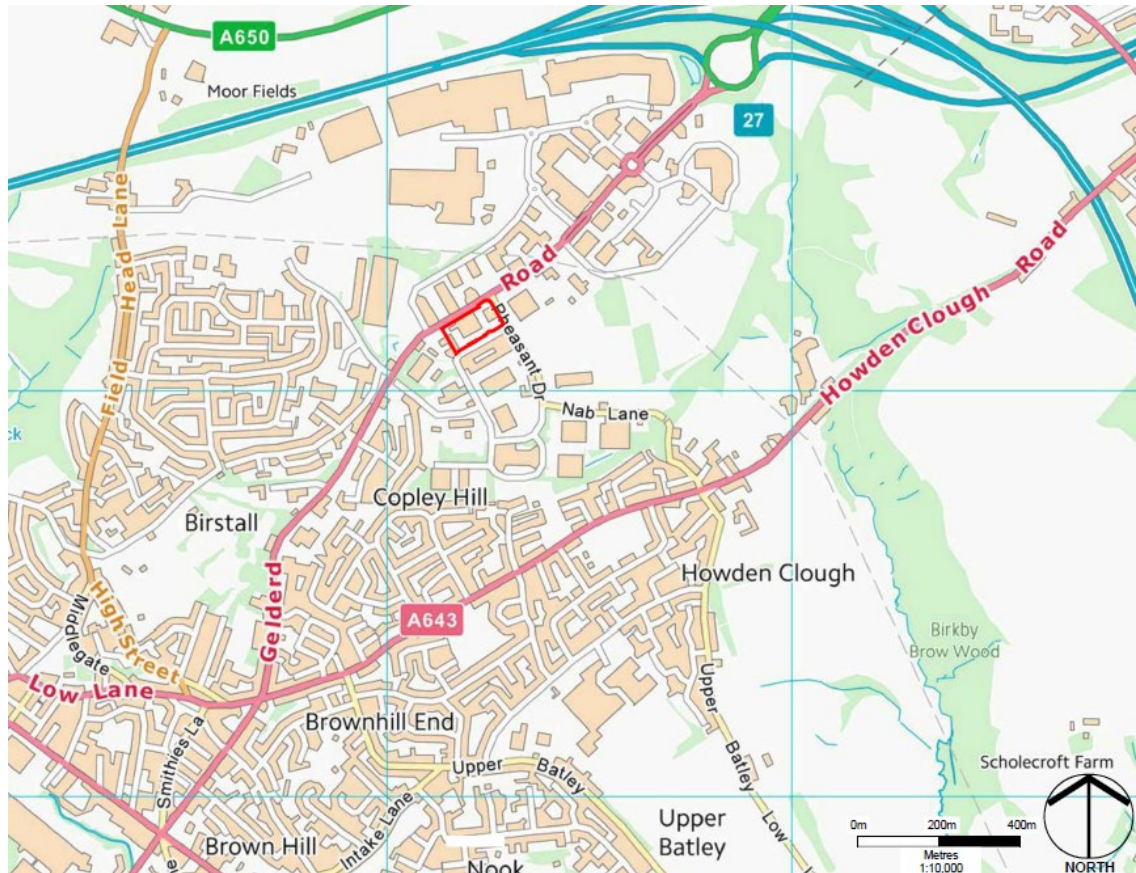


Figure 1 - Site Location Plan (extract from drawing VEO-001-W D.001)

- 2.1.3 The Site extends to approximately 1.1 hectares (11,000m²), of which 4,130m² is occupied by warehouse units and buildings. The remainder of the Site comprises hardstanding storage and service yards.
- 2.1.4 Gelderd Road (A62) bounds the Site to the north with industrial units beyond. Pheasant Drive bounds the Site to the east, beyond which lies Tennants Distribution Ltd chemical plant and an area of undeveloped land. Pennine View borders the Site to the south with industrial units beyond including Tuffnells courier service and Igloo Thermo Logistics transport service. KPH Plant Hire are located on the adjacent plot to the west with GowringsVersa Mobility manufacturers further west.
- 2.1.5 Industrial and commercial development surrounds the Site in the immediate vicinity. The closest sensitive receptor to the Site is identified as The Pheasant Public House approximately 20m north of the Site at its closest point.
- 2.1.6 The residential extent of Batley lies approximately 250-300m south / south-west of the Site. The M62 strategic transport road runs east to west approximately 615m north of the Site, accessed via the M621 at Junction 27.
- 2.1.7 According to the Flood Map For Planning website (<https://flood-map-for-planning.service.gov.uk/>) the Site lies within Flood Zone 1 (i.e. land at the lowest risk of flooding and which has less than a 1 in 1,000 annual probability of river or sea flooding).
- 2.1.8 The Site is not located within a groundwater Source Protection Zone (SPZ), and there are no SPZs located within 2km of the Site.
- 2.1.9 Two statutory designated ecological / nature conservation sites lie within 2km of the Site comprising Birkby Brow Wood (Ancient Woodland) located 820m east, and Oakwell Park Local Nature Reserve (LNR) located 870m west of the Site.
- 2.1.10 Two listed buildings lie within 1km of the Site comprising Grade II listed Clough House, including associated barn and garden wall and Grade II* listed Highfield Farmhouse Cottage approximately 500m and 900m south and south-west of the Site respectively. Further listed buildings are located within 2km of the Site within the settlement of Birstall.
- 2.1.11 The Site is not located within the Green Belt.

2.1.12 The Site is located with a Priority Employment Area and a Biodiversity Opportunity Zone (BOZ) for built-up areas.

2.1.13 The Site is located within a Minerals Safeguarding Area for Surface Coal Reserve (SCR) with Sandstone and/or Clay and Shale.

2.1.14 There are no Public Rights of Way (PROW) within or in close proximity to the Site.

2.2 Background and Site History

2.2.1 Industrial uses on the Site have existed for over 50 years, with the first warehouse unit and weighbridge established in 1971 (according to Google Earth (2024) imagery).

2.2.2 The Applicant has operated the Site as a paper and cardboard recycling facility since 2023. Previously, the Site was operated by recycling and waste management company DS Smith, who acquired the Site in 2007.

2.2.3 There is no recent planning history on the Site. Planning permission for an extension to the industrial uses on site, including raising the roof height of the existing warehouse unit, was granted by the Council in 1996 (ref: 96/62/90864/E1). A second extension to the warehouse unit was granted planning permission in 1997 (ref: 97/62/90166/E1).

2.2.4 The approved operations on-site involve:

- Receiving: Paper ('fibres') is sourced by the Applicant and imported to Site via heavy goods vehicles (HGV). Imported materials are weighed via a weighbridge and quality checked in the quarantine area (located immediately north-west of the main building) before being unloaded and stored 'as received' or tipped within the main building.
- Sorting: Fibres are sorted and graded into two bays (paper and cardboard) in the main building prior to baling. Other secondary waste materials brought in with the paper and cardboard (e.g. polythene, wood, metal) are segregated and stored within the Site.
- Baling: Fibres are placed on a conveyor which transports fibres to a baler. After baling, the bales are manually inspected and transported via forklift trucks to separate storage areas within the main building (eastern extent), to the external

yard in the south-east of the Site, or in the second warehouse within the eastern extent of the Site.

- Storage: Loose / shredded fibres are stored inside the main building, adjacent to the baler. Baled fibres are stored in the eastern portion of the main building, in the external yard in the south-east, or inside the second warehouse. Waste materials that have arisen as secondary to the paper/cardboard recycling (e.g. pallets and plastic tubs) are stored in the north-west. Waste plastics/polythene is stored immediately north-east of the main building. Paper and cardboard bales and spare machinery is stored in the south-western warehouse unit.
- Dispatch: Baled paper and cardboard is loaded onto HGVs, weighed and exported.

2.2.5 There are several ancillary operations within the Site including:

- Plant and machinery operation including forklift trucks and one 'bobcat';
- Vehicle washing via jetwash in the external yard to the west of the main building;
- 300m³ fire water tank and a diesel-powered pump located in a pump house in the north-west of the Site; and
- Office and administrative functions.

3 DESCRIPTION OF DEVELOPMENT

3.1 Introduction

3.1.1 This application seeks permission for the following:

- a) part change of use of a paper/cardboard recycling (B2) facility to incorporate a waste transfer station (WTS) including refuse-derived fuel (RDF) shredding;
- b) installation of 1 No. fabric canopy / bay to support paper and cardboard recycling;
- c) installation of new forecourt separator;
- d) amendments to WTS building including replacement of 2 No. doors with rapid action doors, closure of 2 No. existing doorways and installation of new doorway with rapid action door; and
- e) amendments to paper / card recycling building including replacement of 1 No. door with rapid action door.

3.1.2 Further details of the proposals are set out below.

3.2 Waste Transfer Station

3.2.1 The WTS would accept Commercial and Industrial (C&I) waste for processing. Definitions of C&I waste, contained within the Environmental Protection Act 1990 (last amended 2022), comprise:

- 'waste from premises used wholly or mainly for the purposes of a trade or business or the purposes of sport, recreation or entertainment' (commercial); and
- 'waste from any of the following premises: factory, provision of transport services (land, water and air), purpose of connection of the supply of gas, water, electricity, provision of sewerage services, provision of postal or telecommunication services' (industrial).

3.2.2 All WTS operations would be sited within the main warehouse. Some minor amendments to the warehouse are proposed including installation of two rapid action doors, enclosing two external door openings and the existing partition is to be replaced by a full height partition.

- 3.2.3 Refuse-derived fuel (RDF) storage bays for imported and processed material are proposed internally along the southern boundary of the main warehouse. Other waste including Dry Mixed Recycling (DMR), food and glass is to be stored within the north-western corner of the main warehouse.
- 3.2.4 The proposed internal layout is illustrated on drawing VES_TD_LEDHS_100_002.
- 3.2.5 The incoming loads of commercial and industrial waste will be weighed in at the weighbridge and the incoming waste will be delivered, tipped and stored in the input bays located within the WTS building.
- 3.2.6 A visual inspection of the input loads will be carried out with manual removal of non-compliant material. When a suitable stockpile of RDF waste is present this would be then fed into the inlet hopper of the mobile shredder by loading shovel or similar. This will be done at a rate in order to match the shredding machine nominal capacity. The waste will be shredded and the shredded material will pass under an over band magnet to remove any metals. The shredded material will pass into the output bunker ready for loading directly into HGVs for off-site recovery.
- 3.2.7 The RDF is processed and loaded within the building. Once processed, the RDF will be loaded by mobile plant directly into HGVs for onward transport.
- 3.2.8 Incoming collected glass, DMR and food waste would be offloaded into the internal bulking bays ready for onward shipment. The food waste would be immediately transferred into a sealed stand trailer fitted with a cover.
- 3.3 Paper and Cardboard Recycling**
- 3.3.1 The Site would continue to source and import paper and cardboard waste for recycling. Paper and cardboard recycling is to be relocated to the eastern warehouse unit.
- 3.3.2 The incoming loads of paper will be weighed in at the weighbridge and the incoming waste will be delivered, tipped and stored within the eastern warehouse unit.
- 3.3.3 In order to provide sufficient covered storage space for baled paper and cardboard, a 5m x 10m fabric canopy / bay is to be installed. The existing feed conveyor and baler is to be replaced with a small, more compact baler within the eastern building. In addition, a rapid action door will be fitted to this building to reduce noise breakout.

3.3.4 The proposed internal layout and location of external canopy / bay is illustrated on drawing VES_TD_LEDHS_100_002.

3.4 Volumes

3.4.1 There are no planning restrictions on the amount of material the site can accept and process. In terms of the Environmental Permit, the Site is currently permitted to process between 750 tonnes and 3,500 tonnes (t) of paper and/or cardboard recycling per month.

3.4.2 The proposals anticipate providing capacity for the processing of around 3,500t Construction and Industrial (C&I) waste and 1,000t of paper/cardboard per month.

3.5 Plant and Machinery

3.5.1 A mobile shredder would be operated periodically for processing waste prior to disposal. The shredder would be operated on an 'on demand' basis.

3.6 Vehicle Movements

3.6.1 There are no planning restrictions on the number of vehicle movements allowed to / from the site. Site operations currently generate approximately 30 two-way HGV movements per day. The proposals would result in up to 100 two-way HGV movements per day, with an average forecasted figure of 75 two-way HGV movements per day. This figure includes HGV movements associated with the proposed WTS and paper / cardboard recycling.

3.7 Hours of Operation

3.7.1 The site is currently not subject to restrictions in terms of operational hours. However, as a guide, operations generally take place between 0600 and 1700 Monday to Friday.

3.7.2 It is essential that the site maintains flexibility with operational hours. However, it is currently intended that operations will take place during the following times:

WTS/RDF production/bulking & baling:

- Monday to Friday 0600 to 1700 hours
- Saturday 0600 to 1400 hours

Glass tipping:

- Monday to Friday 0700 to 1700 hours
- Saturday 0800 to 1400 hours

Glass loading onto bulker:

- Monday to Friday 0900 to 1700 hours

Shredding:

- Monday to Friday 0600 to 1700 hours
- Saturday 0700 to 1400 hours

Proposed hours for vehicle movements (except glass):

- Monday to Friday 0600 to 1700 hours
- Saturday 0600 to 1400 hours

3.8 Employment

3.8.1 The Site employs 19 personnel which includes 7 HGV drivers. Employment levels at the Site are to be maintained.

4 PLANNING POLICY

4.1 Introduction

4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that determination must be made in accordance with the Development Plan unless material considerations indicate otherwise.

4.1.2 In reaching a decision on this application, the principal consideration is therefore whether the proposals accord with the Development Plan. Having done this, it is then necessary to have regard to all other material considerations, which include all relevant policy contained within emerging Development Plan Documents as well as national planning policy guidance and relevant legislation.

4.1.3 National policy advocates a presumption in favour of sustainable development and this is carried through the entire planning system. For decision taking, this means that where a proposal is sustainable and in accordance with the Development Plan, planning authorities are directed to grant planning permission without delay unless material considerations indicate otherwise.

4.2 The Development Plan

4.2.1 The Development Plan for the Site comprises:

- Kirklees Local Plan Strategy and Policies (adopted in 2019)

4.2.2 Policies of relevance to this application are set out below.

Kirklees Local Plan Strategy and Policies 2019

4.2.3 Policy LP1 - Presumption in favour of sustainable development - echoes NPPF guidance by requiring the Council to take a positive approach when considering development proposals.

4.2.4 Policy LP7 - Efficient and effective use of land and buildings - requires proposals to encourage the use of previously developed land (providing it is not of high environmental value), look to reuse or adapt vacant or underused buildings, prioritise low quality degraded / contaminated land and look to provide access for any adjacent undeveloped land.

- 4.2.5 Policy LP8 - Safeguarding employment land and premises - supports proposals for development/re-development for employment generating uses in Priority Employment Areas and states that this will be supported where there is no conflict with the established employment use.
- 4.2.6 Policy LP21 - Highways and access - proposals should, inter alia, demonstrate that they will avoid a detrimental impact on highway safety, the local highway network and the Strategic Road Network. All proposals should ensure a safe and efficient traffic flow within the site and also on the surrounding highway network.
- 4.2.7 Policy LP24 - Design - seeks to ensure that good design is considered at the outset of the development process. Proposals should ensure, inter alia, a high level of sustainability, proportionate to the development, through reuse and adaptation of existing buildings and considering reclaimed and recycled construction materials.
- 4.2.8 Policy LP28 - Drainage - requires the use of Sustainable Drainage Systems (SuDS) to achieve acceptable run off / surface water reduction rates. For proposals on brownfield sites, a minimum 30% reduction in surface water run-off will be required where previous positive surface water connections from the site can be proven. The policy also seeks to ensure no negative impacts on local water quality. Development will only be permitted if it can be demonstrated that the water supply and wastewater infrastructure is available and provides sufficient capacity.
- 4.2.9 Policy LP43 - Waste management hierarchy - states that the Council will encourage minimisation of waste production and support re-use and recovery of waste materials. Proposals for waste management facilities will be considered based upon the following:
- moving waste streams up the waste hierarchy of prevention, re-use, recycling, recovery, disposal;
 - seeking on-site management of waste where it arises;
 - using waste as a resource, particularly through co-location of waste compatible developments;
 - working towards achieving the objectives and targets for recycling/recovery for waste as set out in the Waste Framework Directive;

- supporting opportunities to locate complementary facilities, such as waste disposal points and treatment facilities, in close proximity to each other.

4.2.10 Policy LP44 - New waste management facilities - waste management facilities should be located in sustainable locations which are appropriate for waste management uses and all associated operations. Proposals should consider the sequential priority list which seeks to locate facilities firstly on allocated waste management sites, then employment sites then vacant previously developed land. Proposals for waste management facilities need to demonstrate that the following have been considered and addressed:

- duration of the development;
- the layout and design of the site and any associated buildings;
- influence on visual amenity;
- the treatment of boundary features and new screening as appropriate;
- environment and amenity issues such as noise, dust, litter, odour, vermin and gas emissions;
- protection of controlled waters;
- drainage and use of sustainable drainage;
- effects on the natural and historic environment;
- restoration and aftercare where appropriate;
- measures to prevent dirt and debris being carried onto the public highway;
- the adequacy of the highway network and the safety of access and egress arrangements;
- routing and the frequency of vehicle movements;
- hours of operation;
- the protection of public rights of way;
- fairly and reasonably related community benefits.

- 4.2.11 Policy LP51 - Protection and improvement of air quality - seeks to protect air quality through requiring proposals to demonstrate that it is not likely to result in an increase in air pollution which would lead to an unacceptable impact on the natural or built environment. Proposals that have a potential to increase local air pollution must consider and demonstrate an assessment of cumulative impact. Where proposals have an identified impact, mitigation measures must be adopted to reduce the level of impact on local air pollution. Where new receptors are introduced within Air Quality Management Areas (AQMA) or Areas of Concern, the proposals must adopt mitigation measures to protect these new receptors.
- 4.2.12 Policy LP52 - Protection and improvement of environmental quality – requires proposals which have the potential to increase pollution through noise, vibration, light, dust, odour, shadow flicker, chemicals or pollution of soils to be supported by evidence e.g., environmental assessment. This evidence must demonstrate that the proposals will not give rise to unacceptable impacts on people or the environment. Proposals that cannot incorporate suitable mitigation measures will not be permitted.

4.3 National Policy

The National Planning Policy Framework (NPPF) 2023

- 4.3.1 The NPPF is the most up-to-date national planning policy document relevant to the application and is a material consideration in its determination. The most recent version of the NPPF was published in 2023. The document sets out the overarching planning policy that shall be implemented through the Development Plan and determination process. Relevant paragraphs are summarised below.
- 4.3.2 Paragraph 8 of the NPPF outlines the three overarching objectives for achieving sustainable development:
- a) ‘an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
 - b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet

the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- c) an environmental role – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy.'

- 4.3.3 The economic, social and environmental objectives should be pursued in mutually supportive ways. Paragraph 11 constitutes the Government's view of what sustainable development in England means in practice for the planning system.
- 4.3.4 Paragraph 108 sets out the importance of considering transport issues at an early stage in order to address potential impacts of development on existing transport networks. Early consideration of transport issues can help to ensure that the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account, including appropriate opportunities for avoiding and mitigating any adverse effects and for net environmental gains.
- 4.3.5 Paragraph 115 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety or the cumulative impacts on the road network would be severe.
- 4.3.6 Paragraph 123 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Paragraph 124 gives substantial weight to the use of suitable brownfield land within settlements for homes and other identified development needs.
- 4.3.7 Paragraph 180 seeks to ensure that planning decisions contribute to and enhance the natural and local environment through (inter alia) protecting and enhancing valued landscapes and nature conservation sites. New and existing development should not result in unacceptable levels of soil, air, water or noise pollution or land instability.

Development should also, wherever possible, help to improve local environmental conditions such as air quality.

4.3.8 Paragraph 191 states that planning policies and decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risk arising from land instability and contamination. Paragraph 192 requires planning policies and decisions to contribute towards complying with relevant limit values or national objectives for pollutants, including Air Quality Management Areas and Clean Air Zones, and consider the cumulative impacts from individual sites in local areas.

4.3.9 Paragraph 194 emphasises that *'the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities'*.

The National Planning Policy for Waste – October 2014

4.3.10 The NPPW states that positive planning plays a pivotal role in delivering this country's waste ambitions through (inter alia) delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits by driving waste management up the waste hierarchy.

4.3.11 Paragraph 7 of the NPPW sets out several criteria that Waste Planning Authorities should consider when determining planning applications including considering the likely impact on the local environment and on amenity ensuring that waste management facilities in themselves are well designed, so that they contribute positively to the character and quality of the area in which they are located.

4.4 Planning Policy Conclusions

4.4.1 The Site lies within Pennine View Industrial Estate, within a wider industrial and commercial development setting. The Site is highly connected with suitable existing HGV access and egress points. Existing uses on the Site comprise paper and cardboard waste

recycling which involves importation, sorting, processing, storage and exportation of recycled paper and cardboard.

- 4.4.2 The Site is located within an area of Batley which is safeguarded for employment uses. Considering the priority list of locations set out in Policy LP44, the proposed development is considered to comply with these locational requirements, siting waste management operations on an existing waste management site within an established employment area. The Site would continue to operate under controlled conditions and would accord with the conditions of an Environmental Permit. This would ensure that no unacceptable impacts on people or the environment arise as a result of the proposals, in compliance with Policy LP51 and LP52. Mitigation measures will be incorporated into the design and operation of the WTS, in accordance with the supporting environmental assessments that have been undertaken.
- 4.4.3 Proposals for employment generating uses in Priority Employment Areas are supported by Policy LP8 where there is no conflict with the established employment use. Establishing a WTS within an existing warehouse on the Site which is currently used for paper and cardboard recycling is considered to comply with Policy LP8.
- 4.4.4 In conclusion, the proposal is considered to be compliant with Development Plan policy and all material considerations including NPPW and the Waste Hierarchy.

5 ENVIRONMENTAL CONSIDERATIONS

5.1 Introduction

5.1.1 This section of the Planning Statement considers the key environmental and amenity considerations which are relevant to the proposed development. The scope of the proposal is relatively small - a partial change of use to an existing waste management facility. The environmental issues of relevance are, therefore, traffic, dust and noise.

5.1.2 The proposed development is evidenced by the following assessments:

- Noise Assessment
- Air Quality and Dust Assessment

5.1.3 The Site is situated within a well-established industrial park within an urban area of Kirklees. The Site itself does not include any designations of relevance to landscape and visual resources such as a National Landscape or National Park, and no designated heritage assets are situated within the site boundary.

5.2 Traffic

Existing Situation

5.2.1 Existing paper and cardboard recycling operations enable up to 3,500t of paper and card waste to be processed per month, resulting in approximately 30 one-way heavy goods vehicle (HGV) movements per day.

Proposed Development

Trip Generation

5.2.2 The proposals seek to process up to 3,500t of C&I waste and up to 1,000t of paper and cardboard waste per month. This equates to an additional 1000t of waste for processing per month beyond existing approved volumes.

5.2.3 Paper and cardboard waste would be delivered as per current arrangements using 10t Refuse Collection Vehicles (RCV). Front-end loaders (FEL) would be used to deliver C&I waste to the Site. Upon sorting and processing, the waste would be exported from the

Site in articulated (artic) lorries. RCV, FEL and artic vehicles fall within the definition of HGVs.

5.2.4 Proposed HGV movements are set out below:

- Up to 100 HGV two-way movements to the Site per week (in)
- Up to 45 HGV two-way movements from the Site per week (out)
- Combined total of up to 290 movements per week

5.2.5 There are no abnormal loads proposed. It is estimated that, on average, there would be an additional 70 HGV movements to the Site and an additional 15 movements from the Site each week (i.e. an additional 85 HGV movements in total). There is a larger proportion of delivery (in) vehicle movements per day due to the size and capacity of RCV / FEL vehicles (10t) compared with artic lorries (24t).

5.2.6 Due to the location of the Site, and the existing waste operations, it is considered that there will be no significant traffic impact on the local highway network.

Access Arrangements

5.2.7 The site is accessed via Pennine View to the south of the Site. HGVs would continue to access/egress the Site using existing access points. Upon leaving the Site, HGVs would utilise the A62 onto the M62, which forms part of the national strategic road network (SRN).

Mitigation Measures

5.2.8 HGV movements would be spread throughout the day to avoid queuing on the local highway network and / or delays in loading / unloading material.

5.2.9 No existing highway safety patterns or problems have been identified. Furthermore, there are no significant impacts anticipated on the road network as a result of the proposed development. Therefore, no additional mitigation measures are required.

Conclusions

5.2.10 Policies LP21 and LP44 of Kirklees Local Plan (KLP) set out in section 4 provide guidance on highways and access considerations. Proposals should demonstrate that detrimental impacts have been avoided and traffic flow within the site and the surrounding area is

safe and efficient. New facilities for waste management should be in sustainable locations such as allocated sites, employment land or vacant previously developed land (in sequential priority).

- 5.2.11 The Site lies within a Priority Employment Area within the adopted KLP and is well connected to the M62 strategic transport network approximately 615m north of the Site. Industrial and commercial development surrounds the Site in the immediate vicinity. There is an existing established HGV access to and from the Site.
- 5.2.12 The Site currently operates a paper and cardboard waste processing facility. Proposed development comprising a change of use of part of the Site to enable a WTS for C&I waste is not considered to result in any significant adverse impacts upon highway safety or use of the local highway network.
- 5.2.13 The proposals are therefore in accordance with the NPPF, which states that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'

5.3 Noise

- 5.3.1 The Site is located within a well-established industrial estate with industrial and commercial development to the north, south, east and west. The closest sensitive receptor to the Site is identified as The Pheasant Public House approximately 20m north of the Site at its closest point.
- 5.3.2 A Noise Assessment has been undertaken to ensure that the proposals do not give rise to any significant adverse impact upon the amenity of sensitive receptors. The full assessment accompanies this application and a summary is provided below.

Baseline Conditions

- 5.3.3 A background noise survey was undertaken to establish typical representative background sound levels. The survey was located adjacent to The Pheasant Public House being the nearest sensitive receptor (NSR) to the Site. The survey monitored sound levels over a weekday and Saturday morning period to establish typical representative background sound levels.

5.3.4 The representative background sound at the NSR are set out in table 5.1 below.

Time Period	Representative background sound level (Position A) off Pennine View L _{A90} dB [L _{Aeq} dB]
Weekday Daytime: 0700-1700 hours	64 [71]
Weekday Early morning: 0600-0700 hours	63 [70]
Saturday: 0600-0700 hours	51 [66]
0600-1400 hours	61 [69]
0700-0900 hours	55 [68]
0900-1400 hours	62 [70]

Table 5.1: Representative Background Sound Levels

Methodology

5.3.5 The development includes a WTS and would consist of a transfer and RDF building containing a mobile shredder in an existing industrial insulated clad building. The proposed Paper Building would incorporate a paper/card baler and bales would be stored either internal to the building or under the external bay / fabric canopy.

5.3.6 The WTS Facility noise sources would include the following:

- Delivery, tipping and storage in the bulking bays within the WTS building;
- Loading of RDF waste into hopper and waste shredder operation (on an ‘as and when required’ basis) for processing of waste inside the WTS building;
- Loading of RDF and waste into bulker vehicles within the building;
- Bulking of RDF inside WTS building;
- Baling of paper/card in the Paper Building and storage of bales internal to building and under the external fabric canopy; and
- Noise from the movement of HGVs on site and the cumulative effect of mobile plant movement, WTS, Baling and RDF processing in operation.

5.3.7 In order to obtain data on the proposed noise level from these sources, noise surveys were undertaken at similar Waste Transfer Station facilities operating in the UK during peak operating activities. Additional noise surveys have also been undertaken at three

Veolia sites with a waste shredder in operation. Data from these surveys has been used to inform the noise model.

- 5.3.8 For site operational noise the assessment has used ISO9613-2 prediction modelling and CadnaA software to produce noise maps of the highest likely generated noise. The methodology takes into account source position, distance, duration of activity in relation to site activities and the nearest sensitive receptors. The noise modelling assumes that all plant is operating. The prediction calculations therefore provide an indication of the highest likely noise level.
- 5.3.9 Predictions for mobile plant movements on site have been based on the calculation methodology provided under BS 5228. The assessment has used CadnaA software prediction modelling for the calculations. The noise model uses empirical data and reasonable settings to give an accurate prediction of noise from Site.

Consideration of Potential Impacts

Daytime Period

- 5.3.10 The table below shows the range of predicted highest likely noise levels from site operations which would occur during the daytime and early morning periods.

Receptor Position (Refer to Figure 1 in Noise Report)	Period	Activity	Background sound level LA90 (dB) [Residual LAeq dB]	Rating noise level LAeq1hr/15mins (dB)	Level Difference dB(A)
R1. The Pheasant Public House	Monday-Friday (0600-0700)	WTS ops/Baler & bale ops/HGV /mobile plant /bulking/ shredding & offload inside	63 [70]	52 ^{1&2}	-11
R1. The Pheasant Public House	Monday-Friday (0700-1700)	WTS ops/Baler & bale ops/HGV /mobile plant /bulking /shredding & offload inside	64 [71]	54 ^{1&2}	-10

Receptor Position (Refer to Figure 1 in Noise Report)	Period	Activity	Background sound level LA90 (dB) [Residual LAeq dB]	Rating noise level LAeq1hr/15mins (dB)	Level Difference dB(A)
R1. The Pheasant Public House	Saturday (0600-0700)	WTS ops/Baler & bale ops/HGV /mobile plant /bulking & offload inside	51 [66]	51 ^{1&2}	0
R1. The Pheasant Public House	Saturday (0700-0900)	WTS ops/Baler & bale ops/HGV /mobile plant /bulking / shredding & offload inside	55 [68]	54 ^{1&2}	-1
R1. The Pheasant Public House	Saturday (0900-1400)	WTS ops/Baler & bale ops/HGV /mobile plant /bulking / shredding & offload inside	62 [70]	54 ^{1&2}	-8

Table 5.2: Predicted Cumulative Noise Rating Level from General Activities on Site with Proposed Noise Mitigation Measures

5.3.11 The results show no exceedance of background sound (which includes a +3dB penalty applied to the rating level for noise character) based on a representative background level and highest likely site noise contribution according to BS4142: 2014+A1:2019.

Event Noise

5.3.12 During operation of the WTS, the following events are considered to represent occasional peak noise events:

- The loading of glass from the bulking bay into bulker vehicles within the WTS building between 0900 to 1700 hours (Monday to Friday).
- The reversing of HGVs into the main building could potentially occur between 0600 to 1700 hours during weekdays and Saturdays.

Receptor Position (Refer to Figure 1 of Noise Report)	Period	Activity	Background sound level LA90 (dB) [Residual LAeq dB]	Rating noise level LAeq1hr/15mins (dB)	Level Difference dB(A)
Glass Loading onto Bulker					
R1. The Pheasant Public House	Monday-Friday (0900-1700)	Glass Loading into Bulker within WTS building	63 [71]	61 ¹	-2
HGV Reversing into WTS Building					
R1. The Pheasant Public House	Monday-Friday (0600-0700)	HGV Reversing Alarm with WTS operating	63 [70]	50 ²	-13
R1. The Pheasant Public House	Monday-Friday (0700-1700)	HGV Reversing Alarm with WTS operating	64 [71]	50 ²	-14
R1. The Pheasant Public House	Saturday (0600-0700)	HGV Reversing with WTS operating	51 [66]	50 ²	-1
R1. The Pheasant Public House	Saturday (0700-0900)	HGV Reversing with WTS operating	55 [68]	50 ²	-5
R1. The Pheasant Public House	Saturday (0900-1400)	HGV Reversing with WTS operating	62 [70]	50 ²	-12

Table 5.3: Predicted Noise Rating from Noise Events at Site with Proposed Noise Mitigation Measures

5.3.13 The above noise predictions of noise events (including a +3dB allowance for impulsivity during glass loading and +2dB allowance for tonality during reversing alarms for robustness) show a low impact according to BS4142:2014+A1:2019.

LAmax Predicted Levels

5.3.14 The predicted LAmax levels at NSRs during early morning periods from WTS activities are likely to be between 5dB and 10dB higher than the LAeq predictions. For reversing

alarm activities, the L_{Amax} levels vary between 9dB to 10dB higher than the L_{Aeq} . This is represented in Table 5.4 below.

Receptor Position	Period	Activity	Typical Existing L_{Amax} dB	Predicted L_{Amax} (dB)
R1. The Pheasant Public House	0600-0700 (Mon-Fri)	WTS ops/Baler & bale ops/HGV /mobile plant /bulking/ shredding & offload inside	78-87	54-59
R1. The Pheasant Public House	0600-0700 (Saturday)	WTS ops/Baler & bale ops/HGV /mobile plant /bulking & offload inside	77-79	53-58
R1. The Pheasant Public House	(0600-0700) (Mon-Fri)	HGV Reversing Alarm with WTS operating	78-87	57-58
R1. The Pheasant Public House	0600-0700 (Saturday)	HGV Reversing Alarm with WTS operating	77-79	57-58

Table 5.4: L_{Amax} Noise Predictions During Daytime and Night-time Periods

5.3.15 The above table shows the highest likely L_{Amax} levels to be much lower than the existing ambient noise and below the threshold of significance during night-time periods at residential receptors (i.e. below sleep disturbance criteria of 60dB external to dwellings) and is therefore not considered to be significant.

Vibration

5.3.16 Ground-borne vibration has not been considered in the noise assessment as the type of noise source and separation distance between the NSR and the site is beyond the point at which any vibration is likely to be perceptible.

Road Traffic

5.3.17 Traffic generated by the Site is expected to be 50-100 HGVs over a typical weekday period (i.e. circa 5-10 HGVs visiting per hour). Access to the Site would be via the existing

access onto Pheasant Drive with egress onto Pennine View (A62) which forms part of the Industrial Estate.

5.3.18 In view of the location and connection to the industrial estate and subjective observation of local road network baseline flows, the assessment concluded that this level of traffic demand is not considered to generate any significant noise increase in road traffic noise.

Consideration of Mitigation Measures

5.3.19 Where new noise sources have been identified as being significant or have the potential to cause a significant increase in existing noise levels, the noise assessment provides recommendations for noise amelioration using Best Available Techniques (BAT).

5.3.20 No significant noise impacts have been identified. Control measures to ensure that site operations achieve reasonable and relevant noise criteria are set out below:

- Existing wall and roof insulated double skin cladding and any existing concrete block or brickwork with insulating board to remain in place (for WTS and Paper Building) except where any new door openings are created.
- WTS building to include additional low-level concrete 'push' walls within the building (see attached Figure 3) to form new bulking bays (i.e. food, glass, DMR and RDF input and output).
- Doorways that require infilling to be formed by either brickwork/concrete blockwork or insulated double skin cladding.
- New doorways to be formed by standard electric rapid action doors.
- Mobile plant fitted with broadband type noise reverse alarms (i.e. non-beeper type).
- DMR bulking bay to have new full height partition formed by concrete blockwork/brickwork or double skinned insulated cladding. Any existing side walls and roof of DMR bay above push walls to be insulated on inside with secondary skin.

- Existing clad screen between WTS and Paper Building (i.e. adjacent to Pennine View) to be retained.
- A limit on operating hours will be imposed via condition.

Management Control Applying Best Practice

5.3.21 Drivers of mobile plant would be instructed to avoid un-necessary banging of loading 'buckets' onto WTS floor areas (i.e. bucket placed on floor), avoid un-necessary scraping of floor areas and excessive revving of engines.

5.3.22 Vehicles arriving or exiting site (particularly prior to 0700 hours) should consider the following general management procedures in accordance with the 'quiet deliveries demonstration scheme':

- Consideration to noise and the neighbours is shown as an approach is made to the site and manoeuvring in the service yard;
- The vehicle horn is not to be used to alert the site on arrival or waiting;
- Engines are switched off when not manoeuvring;
- Radios are switched off and doors not slammed when alighting the cab;
- Load retaining straps/bars are carefully placed in stowage points, not dropped onto the floor;
- Minimise excessive air braking noise;
- Switch off engines for prolonged stops, but minimise unnecessary start-ups and engine revving;
- Always unload or load in the designated delivery/loading area, unless instructed by the site management to do otherwise;
- Report any circumstances to management where adherence to these instructions cannot be fulfilled.

Residual Impacts

5.3.23 The Noise Assessment has not identified any significant adverse impacts in relation to noise generation as a result of the proposed development.

Conclusions

5.3.24 As a result of analysis of measured baseline data, detailed calculations and consideration of appropriate and relevant noise guidance and standards, the following conclusions are drawn:

- Predicted noise levels from the operation of the WTS and Paper Processing Building, HGV movements, mobile plant movement, waste shredder and bulking activity operations show that the site rating noise level would not exceed representative background sound levels and are therefore likely to result in a **low impact** according to BS4142: 2014+A1:2019.
- The results of noise predictions for occasional noise events, such as glass loading into bulker vehicles inside the WTS and HGV reversing alarms (including noise character penalties) also show a **low impact** according to BS4142:2014+A1:2019.
- The predicted noise contribution at the NSR from the operation of the Site during the highest likely operational noise levels show a range between 48dB(A) to 51dB(A) Leq1hr/15mins. During occasional noise events, the highest short-term noise levels are shown to be between 48dB(A) to 58dB(A) Leq1hr/15mins. These levels are well below typical residual sound levels at the NSR (i.e. more than 10dB below), which would also provide good masking of any site attributable noise.

5.3.25 The Noise Assessment concludes that the proposed operation of a WTS within the Site would generate noise levels within relevant noise standards and guidelines at nearest sensitive receptors and therefore noise would be **not significant**.

5.4 Air Quality

5.4.1 The proposed WTS will operate under a Standard Rules Permit issued by the Environment Agency (EA) with control conditions on the type of waste to be accepted, management of waste streams and a list of permitted activities.

5.4.2 Despite operating within an EA Permit, the proposals have the potential to cause air quality impacts at sensitive locations. These include:

- Fugitive dust emissions during operation;

- Fugitive odour emissions during operation; and
- Road traffic exhaust emissions from vehicles travelling to and from the Site during operation.

5.4.3 An Air Quality Assessment has been undertaken in order to determine baseline conditions at the Site and consider potential effects as a result of the proposals.

5.4.4 A summary of the Air Quality Assessment findings is provided below, and the full assessment accompanies this planning application.

Legislation and Policy

5.4.5 The pollutants considered within the Air Quality Assessment (the ‘AQA’) (in accordance with the Air Quality Standards Regulations (2010) (and subsequent amendments)) are set out in Table 5.5 along with their Air Quality Objectives (AQOs) and interim targets.

Pollutant	Air Quality Objective/Interim Target	
	Concentration (µg/m³)	Averaging Period
NO ₂	40	Annual mean
	200	1-hour mean, not to be exceeded on more than 18 occasions per annum
PM ₁₀	40	Annual mean
	50	24-hour mean, not to be exceeded on more than 35 occasions per annum
PM _{2.5}	12 ^(a)	Annual mean

Note: (a) Interim Target to be achieved by end of January 2028.

Table 5.5: Pollutants and their Air Quality Objectives/Interim Target

5.4.6 Table 5.6 below summarises the advice provided in DEFRA guidance on where the AQOs for pollutants considered within the AQA apply.

Averaging Period	Objective Should Apply At	Objective Should Not Apply At
Annual mean	<p>All locations where members of the public might be regularly exposed</p> <p>Building façades of residential properties, schools, hospitals, care homes etc.</p>	<p>Building façades of offices or other places of work where members of the public do not have regular access</p> <p>Hotels, unless people live there as their permanent residence</p> <p>Gardens of residential properties</p> <p>Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term</p>
24-hour mean	<p>All locations where the annual mean objective would apply, together with hotels</p> <p>Gardens of residential properties</p>	<p>Kerbside sites (as opposed to locations at the building façade), or any other location where public exposure is expected to be short term</p>
1-hour mean	<p>All locations where the annual mean and 24 and 8-hour mean objectives apply. Kerbside sites (for example, pavements of busy shopping streets)</p> <p>Those parts of car parks, bus stations and railway stations etc which are not fully enclosed, where members of the public might reasonably be expected to spend one hour or more</p> <p>Any outdoor locations where members of the public might reasonably be expected to spend one hour or longer</p>	<p>Kerbside sites where the public would not be expected to have regular access</p>

Table 5.6: Examples of Where the Air Quality Objectives Apply

Methodology

5.4.7 The full methodology for the Air Quality Assessment is set out in section 3 of the AQA report and involves estimating the dust and odour generating potential of the Site activities, and the potential for trips generated by the development to affect local air quality.

Baseline Conditions

AQMAs

5.4.8 The site is located approximately 2.6km south-east of the closest Air Quality Management Area (AQMA). It is considered unlikely the proposals would affect air

quality over a distance of this magnitude. As such, the AQMA was not considered further in the AQMA.

Air Quality Monitoring

5.4.9 The Council undertake nitrogen dioxide (NO₂) monitoring at 3 locations within 1km of the Site. Annual mean NO₂ concentrations were below the AQO of 40µg/m³ at all monitors in recent years (details in Table 14 of the AQMA report).

5.4.10 The Council do not undertake monitoring of PM₁₀ or PM_{2.5} concentrations within the vicinity of the site.

Background Pollutant Concentrations

5.4.11 Predictions of background pollutant concentrations on a 1km by 1km grid basis have been produced by DEFRA for the entire of the UK to assist local authorities in their Review and Assessment of air quality. The site is located in grid square NGR: 423500, 427500. Data for this location was downloaded from the DEFRA for the purpose of the AQMA and is summarised in Table 5.7.

Pollutant	Predicted 2024 Background Pollutant Concentration (µg/m ³)
NO ₂	19.07
PM ₁₀	13.71
PM _{2.5}	8.81

Table 5.7: Background Pollutant Concentration Predictions

5.4.12 As shown in Table 5.7, predicted background NO₂, PM₁₀ and PM_{2.5} concentrations are below the relevant AQOs and Interim Target at the site.

Sensitive Receptors

Source		NGR (m)		Distance from Potential Emission Source (m)	Direction from Site
		X	Y		
R1	Commercial - The Pheasant Public House	423215.2	427226.0	25	North
R2	Residential - Nab Lane	423057.3	426981.6	205	South-west
R3	Commercial - Everlast Gym	423469.5	427348.1	250	North-east
R4	Commercial - Junction 27 Retail Park	423437.0	427451.6	305	North-east
R5	Commercial - Easy Bathrooms and Tiles	423006.2	427203.2	160	North-west
R6	Residential - Lowood Lane	422851.4	427152.9	305	West
R7	Residential - Gelderd Road	423023.1	427082.2	170	South-west

Table 5.8: Sensitive Receptor Locations

5.4.13 There are very few sensitive receptors in proximity to the Site, the closest being The Pheasant Public House.

Meteorological Data

5.4.14 The prevailing wind direction at the Site is from the west. Winds from the north and east are relatively infrequent, which is indicative of conditions throughout the majority of the UK. Full meteorological data is set out in Table 17 of the AQA report.

Consideration of Potential Impacts

Fugitive Dust Emissions

5.4.15 Using the sensitive receptors listed in Table 5.8, the Source Emission Potential, Pathway Effectiveness and receptor sensitivity were combined to assess potential impacts associated with the proposed development. This is summarised in Table 5.9 below.

Receptor		Source Emission Potential	Pathway Effectiveness	Dust Impact Risk	Sensitivity	Effect Significance
R1	Commercial - The Pheasant Public House	Medium	Highly effective	Medium	Medium	Slight
R2	Residential - Nab Lane	Medium	Moderately effective	Low	High	Slight
R3	Commercial - Everlast Gym	Medium	Moderately effective	Low	Medium	Negligible
R4	Commercial - Junction 27 Retail Park	Medium	Ineffective	Negligible	Medium	Negligible
R5	Commercial - Easy Bathrooms and Tiles	Medium	Moderately effective	Low	Medium	Negligible
R6	Residential - Lowood Lane	Medium	Ineffective	Negligible	High	Negligible
R7	Residential - Gelderd Road	Medium	Moderately effective	Low	High	Slight

Table 5.9: Dust Emissions - Risk Assessment

5.4.16 As shown in Table 5.9, the effect significance was predicted to be negligible at four receptors and slight at three locations.

5.4.17 The IAQM guidance states that only if the impact is moderate or substantial, the effect is considered significant. As such, potential impacts as a result of dust emissions from the development are considered not significant, in accordance with the stated methodology.

Fugitive Odour Emissions

5.4.18 The first step was to classify the Source Odour Potential. This was determined as medium for the following reasons:

- The facility will operate under an Environmental Permit and will process 54,000tpa of material;

- Odours associated with the processes at the facility would be classed as 'moderately offensive' in EA Guidance H4; and,
- Activities will take place within enclosed buildings on site. This will control fugitive emissions during normal operation.

5.4.19 Using the sensitive receptors listed in Table 5.8, the Source Odour Potential, Pathway Effectiveness and receptor sensitivity were combined to assess potential impacts associated with the proposed development. This is summarised in Table 5.10 below.

Receptor		Source Odour Potential	Pathway Effectiveness	Exposure Risk	Sensitivity of Receptor	Effect Significance
R1	Commercial - The Pheasant Public House	Medium	Highly effective	Medium	Medium	Slight
R2	Residential - Nab Lane	Medium	Moderately effective	Low	High	Slight
R3	Commercial - Everlast Gym	Medium	Moderately effective	Low	Medium	Negligible
R4	Commercial - Junction 27 Retail Park	Medium	Ineffective	Negligible	Medium	Negligible
R5	Commercial - Easy Bathrooms and Tiles	Medium	Ineffective	Negligible	Medium	Negligible
R6	Residential - Lowood Lane	Medium	Ineffective	Negligible	High	Negligible
R7	Residential - Gelderd Road	Medium	Ineffective	Negligible	High	Negligible

Table 5:10: Odour Emissions - Risk Assessment

5.4.20 As shown in Table 5.10, the predicted odour effect significance was negligible at five receptors and slight at two locations.

5.4.21 The IAQM guidance states that only if the impact is moderate or substantial, the effect is considered significant. As such, potential impacts as a result of odour emissions from

the development are considered not significant, in accordance with the stated methodology.

Road Vehicle Exhaust Emissions

- 5.4.22 Any vehicle movements associated with the proposals will generate exhaust emissions on the local and regional road networks. The facility is predicted to produce 42 Heavy Duty Vehicle (HDV) trips per day as an Annual Average Daily Traffic flow.
- 5.4.23 Based on the information above, the development is not predicted to result in an increase of Light Duty Vehicle (LDV) flows of more than 500 AADT or HDV flows of more than 100 AADT on any individual road link. Additionally, the proposals do not include significant highway realignment or the introduction of a junction. As such, potential air quality impacts associated with operational phase road vehicle exhaust emissions are predicted to be not significant, in accordance with the IAQM screening criteria shown in Section 3.4 of the AQA report.

Consideration of Mitigation Measures

- 5.4.24 The facility will operate in accordance with the requirements of an Environmental Permit issued by the EA. This will include requirements for dust minimisation and provides regulatory control of potential impacts throughout the operational life of the plant.
- 5.4.25 No significant adverse effects impacts have been identified through the AQA and, therefore, no further mitigation measures are recommended.

Residual Impacts

- 5.4.26 The Air Quality Assessment has not identified any significant adverse impacts in relation to air quality or dust emissions as a result of the proposed development.

Conclusions

- 5.4.27 The risk of potential effects as a result of fugitive dust and odour emissions from the facility during the operational phase was assessed using the IAQM methodology. This included consideration of the Source Emission and Odour Potential, Pathway Effectiveness and sensitivity of relevant receptors in the vicinity of the site. The results

of the assessments indicated overall effects as a result of the development were predicted to be **not significant**.

- 5.4.28 The risk of potential effects as a result of road vehicle exhaust emissions during the operational phase was assessed against screening criteria provided within the IAQMA guidance. Due to the low number of anticipated vehicle trips associated with the proposals, road traffic exhaust emission impacts were predicted to be **not significant**.
- 5.4.29 Based on the assessment results, air quality factors are not considered a constraint to planning consent for the development.

6 CONCLUSIONS

- 6.1.1 The NPPF states in paragraph 7 that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means that the planning system has three overarching objectives; economic, social and environmental. The environmental objective is *'to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.'* This planning application seeks to establish a WTS within the Site to provide a greater breadth of waste management services.
- 6.1.2 The proposed development will result in up to an additional 100 two-way HGV movements per day, with an average forecasted figure of 75 two-way HGV movements per day. This figure includes HGV movements associated with the proposed WTS and paper /cardboard recycling. No significant adverse impacts on highway safety or use of the local highway network are anticipated as part of the proposed development.
- 6.1.3 The Noise Assessment concludes that the proposed operation of a WTS within the Site would generate noise levels within relevant noise standards and guidelines at nearest sensitive receptors and therefore noise would be not significant.
- 6.1.4 Based on the results of the Air Quality Assessment, no significant adverse impacts in relation to dust, traffic or odour emissions are anticipated and, therefore, air quality factors are not considered a constraint to planning consent for the development.
- 6.1.5 At the heart of the NPPF is the presumption in favour of sustainable development for proposals which are in accordance with the Development Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission should be determined in accordance with the provisions of the Development Plan unless material considerations indicate otherwise.
- 6.1.6 In conclusion, the proposed change of use to incorporate a WTS and RDF shredding operation into the existing site accords with the Development Plan for Kirklees and there are no material considerations which indicate otherwise.