Application Number SMD/2017/0506
WG Tankers
Winkhill Garage Ashbourne Road Winkhill.

Re: Proposed Development – removal of condition 12 (site operation times) – 08/01675/FUL_MJ

OBJECTION TO THE ABOVE – DATED 11.09.2017

The below sets out my objections to the removal of the above condition and a detailed explanation of the reasons why.

In the planning statement composed by the Winter Partnership dated July 2017 a number of arguments are made to support the removal of current site operation restrictions most of which appear to be opinion based and not based on evidence or fact, both of which are essential when compiling an argument.

In the planning statement section 1.0, they state;

i) The statement "the site has now been formed ready to accept the new buildings and workshop"

Objection; *Before the commencement of extending working hours is granted and to minimise the impact on the residents, would it not be prudent to fulfil the original granted planning permission (08/01675/FUL_MJ) of ensuring the satisfactory external appearance of the development in the interests of safeguarding the character and appearance of the surrounding area, which to date has not been fulfilled? If the site were developed as per the original planning permission the question of the removal of condition 12 could be revisited after construction work has been fully completed.*

ii) The statement "since the approval of the above working methods and hours have altered across the world to suit the customers' requirements it is necessary to alter the working hours to suit these changed practice".
Objection; *This again refers to back to the above; why does the restriction need to be in place if the site is not operational as per the original granted planning permission? There would be currently no need for condition 12 to be lifted. In addition, there is no supporting evidence documented (or supplied) that substantiates this statement. It is purely a generalised statement that carries no actual fact, can they supply evidence to support this fact? If not, it is merely conjecture.*

iii) The statement "In connection with the above, it is important to vary the working site to enable the efficient use of the operatives in what has become a very competitive market".
Objection; *Apparently WG Tankers currently employ 35 local people and plan to increase this number when they eventually relocate. What numbers are they planning to increase to? How will these numbers affect the working hours and numbers of staff that are actually working? Will they have a full 24 hour workforce? How will a full 24 hour workforce impact on the residents of Winkhill and surrounding areas? Again no hard evidence to support the statement.*

2.0

i) The statement "WG Tankers current locations where there are currently no working hour specific requirements despite the closeness of residential housing at two of the depots"

Objection; *Just because there are* ***currently*** *no working hour restrictions in place at these locations (whether they are close to residential properties or not) does not follow that there should not be restrictions in place at the site at Winkhill. I would also assume that all of the sites mentioned have already been developed and are not currently still in any stage of incomplete planning permission status? See point one.*

ii) The statement "requirements of 24 hour access to areas to pick up, drop off and in some instances emergency work and the new facility in Winkhill will have internal facilities within reasonable noise limits".

Objection; *Has an assessment of the numbers of emergency maintenance repairs that currently take place been performed, i.e. are there 10 a week or 1 a week? Has an assessment of the numbers of clients that require 24 hour access been performed to assess the impact of how busy or not busy this requirement will be? What are reasonable noise limits? Has an assessment of current noise limits been performed at an operational site (one that would be equivalent to the site at Winkhill) in order to assess the impact of this statement? If not then this is conjecture.*

3.0

i) The statement "the layout of the site and also orientation of the building have been carefully thought through so as to limit noise nuisance and transmission". After mentioning various locations of properties, it then goes onto state " based on the above it is believed that noise will not be an issue with the regards to the site operation, especially when compared to the current WG Tanker Group operations elsewhere.

ii) **Objection;** *this again is conjecture. It is "believed" is not proof of the fact. There needs to be hard evidence supplied in the form of noise level comparisons from sites elsewhere and proof that this will not be increased or impact on the current noise levels in Winkhill.*

iii) The statement "we have to consider the main A523, this is a major trunk road with no restriction and therefore 24hour noise levels from this will be variable and it is considered that the noise levels from these greatly exceed any noise from vehicle movements to and from the site in question".

Objection; *As my property directly faces the A523 I feel that I am best placed to address this objection. Having lived in my home for over 2 years the noise levels and traffic volumes have significantly increased during this time. I have kept logs of numbers of larger vehicles/tankers using the road (during specific times) for the past 18 months to support the above statement. The addition of allowing 24hour working/access will only add significant numbers to this already increasing problem of noise pollution and disturbance to not only myself but other residents of the area. In addition no evidence of a traffic survey to substantiate the claim made in the statement has been offered.*

4.0

i) The statement "the development of the site was approved on the 5th August 2010 and the site preparation, levels and material removal have now been completed in accordance with this"
Objection; *Please see attached PDF of the original plans for the development of the site when PP was granted and please also see a recent photograph which clearly shows that the preparation of the site has not been completed as per the original planning permission. This statement therefore is null and void.*

ii) The statement "the current conditions only allow for restrictive use of the site and since the approval requirements have changed which require the 24 hour operation of the facility".
Objection; *The current restrictions are in place whilst the site is being developed. It is still being developed and is not an operational site. The statement does not elude to the meaning of the term "approval requirements have changed". Full explanation of this statement would be required to support the above.*

iii) The statement "this mainly relates to the collection and dropping off of vehicles although in some instances maintenance will be necessary, although this will be within the workshop, offices or stores which will significantly reduce noise levels at the boundary to a level lower than ambient noise levels".
Objection; *This statement cannot be supported as a requirement for the removal of the 24 hour working restriction as none of the above facilities (workshop, office or stores) are currently in place therefore negating this statement in its entirety. In addition there again there is no supporting evidence of what the current ambient noise levels are.*

5.0

i) The statement "the proposed alteration in operating hours is to ensure that the site accord with current client demand, any variation to the proposed is likely to affect the viability of the proposed operation".
Objection; *As the site is not yet developed to accommodate the original granted planning permission there appears to be no reason to expect that removal of the restriction would affect the proposed operation again making this statement null and void.*

ii) The statement "the current operations in Waterhouses and also Foston, both of which are close to residential properties are operated in a way that there have been no complaints relating to noise or the hours of operation and it is believed that this will also be the case with regard to the new facility in Winkhill".
Objection; *Has an anonymous survey been completed by the residents who reside near to these sites to substantiate this claim? Again it is not sufficient to "believe" that this will be the case with regards to the new facility. This statement is again conjecture and not based on fact.*

Conclusion:

The objections to the removal of the current site operation times (section 12) are detailed above. The statement, it would appear has been based on conjecture and beliefs and not fact. There is no evidence of for example, traffic surveys being completed, noise level testing being performed and information on the impact to the area of Winkhill itself to support any of the statements made. I have recorded proof as to the increase in traffic numbers over my time as a resident in Winkhill and can support the statement I have made and will be submitting my information to Staffordshire Highways whom I assume will be consulted on this request?

Whilst the site is still in a state of development and the facilities that it needs to operate a 24 hour service (as it has outlined in the proposal) are not yet in place, why is there a need for a removal of the restriction? I can understand the restriction being applied to be removed when the facility is developed but until such as time there is no basis factual or business need for the removal of the restriction.

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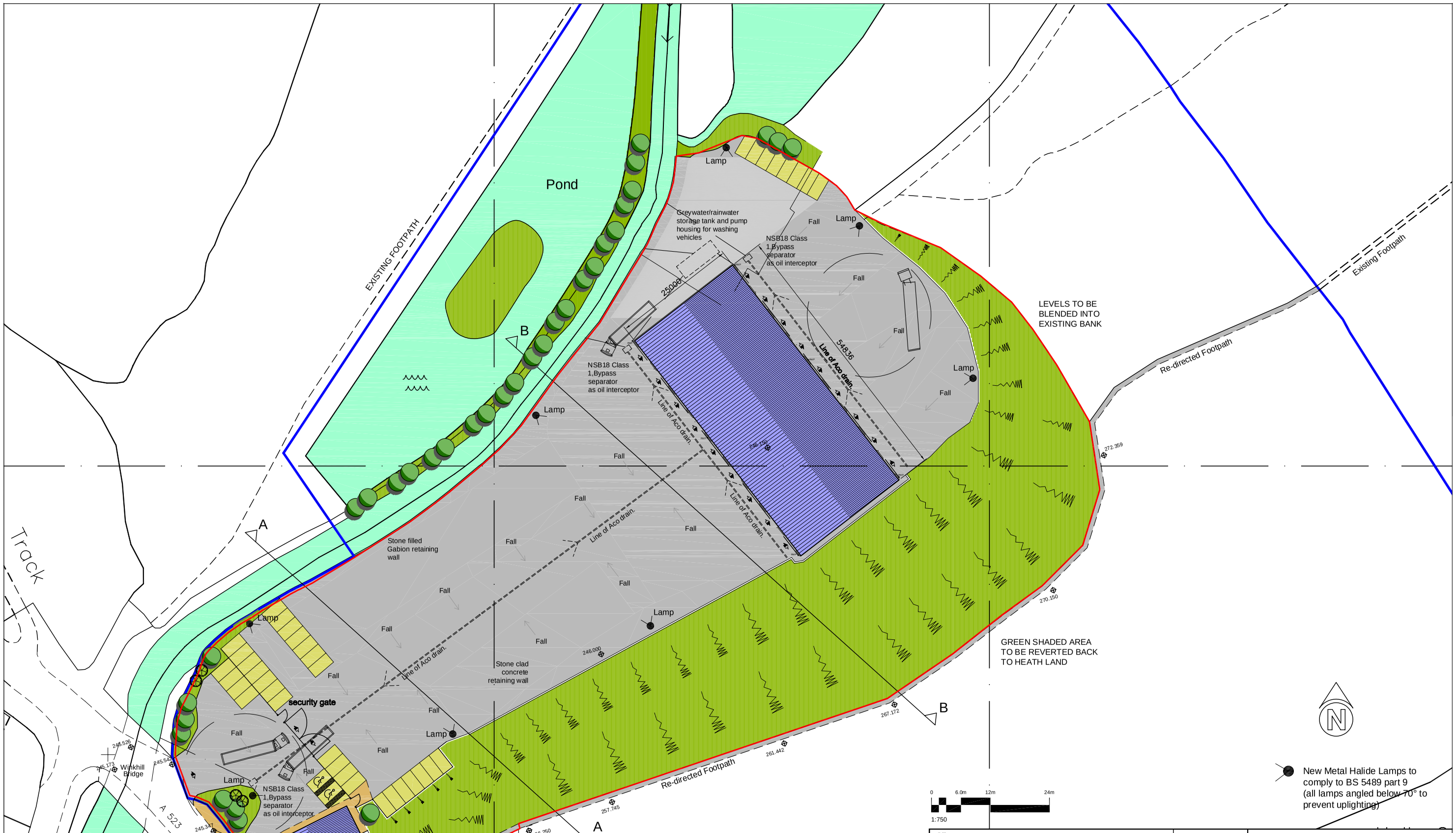
Enc. PDF planning proposal
Image taken Aug 2017.



Client
WG TANKERS

Contract
WINKHILL
NEW TANKER DEPOT

Drawing
PROPOSED SITE PLAN

Drawing No
TWP-WG08-002
Revision
C - 30° Bank
Date
Jul '08
Scales
1:750 @ A3
Drawn
CAB
Checked
SC

the winter partnership
chartered building surveyors
property consultants
24 rottingdean place
falmer road
brighton bn2 7fs
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e scooper@winterpartnership.co.uk


Wincanton
Whit
SITE SAFETY
No admittance for unauthorised personnel
This is a hard hat area
Protective footwear must be worn
High visibility jackets must be worn
Trespassers
be prosecu