

41 Harwood Road, Littlehampton

Mineral Infrastructure Statement

Ref. 21111-R1

November 2021

On behalf of Inpress Plastics Ltd

TECHNICAL SOLUTIONS FOR SUSTAINABILITY AND BROWNFIELD DEVELOPMENT

Westenviro Ltd Incorporated in England and Wales No. 7965953.

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1. Introduction

1.1 Background

This document comprises a Mineral Infrastructure Statement (MIS) for a proposed development comprising construction of a new industrial unit with the replacement of an existing industrial unit with proposed maximum heights of 14 metres, at the former Metcraft Ltd premises at 41 Harwood Road, Littlehampton BN17 7BB, now part of the Inpress Plastics manufacturing site.

1.2 Purpose and Scope of Mineral Infrastructure Statement

The requirement for the MIS arises from a requirement affecting the planning application for the proposed development, reference LU/290/21/PL, in the Arun District Council planning application validation requirements. These identify a requirement for an assessment of the impact the non-minerals development will have on the minerals infrastructure taking account of the Minerals and Waste Safeguarding Guidance (MWSG) and how the proposal addresses Policy M10 of the Joint Minerals Local Plan (2018) (JMLP).

JMLP Policy M10, Safeguarding Minerals Infrastructure, states (inter alia) the following:

- (a) *Development on, or near to, sites hosting permanent minerals infrastructure, that would prevent or prejudice its operation will not be permitted unless:*
 - (i) *the site or infrastructure is no longer suitable for continued minerals use; or*
 - (ii) *redevelopment of the site or loss of the infrastructure would form part of a strategy or scheme that has wider social and/or economic benefits that clearly outweigh the retention of the site or the infrastructure for minerals use; and,*
 - (iii) *a suitable replacement site or infrastructure has been identified and is available;*
- (b) *Where safeguarded infrastructure is situated within a host quarry, wharf, or rail depot facility, it is safeguarded for the life of the host site.*
- (c) *The following permanent wharves and railheads are safeguarded for the purposes of mineral transportation...*

Policy M10 identifies Railway Wharf, Littlehampton, as safeguarded as delineated in Policies Map 4 in the JMLP. The safeguarding also covers an adjacent coated roadstone site.

The proposed development does not cover any of the safeguarded area but is within 160m of the safeguarded area boundary. Although Policy M10 does not identify a specific buffer distance defining the consultation zone, the JMLP text states that the Minerals Planning Authority (West Sussex County Council) will be consulted on any application within 250m of the safeguarded area. It also states that buffers may be included such that sensitive uses are not located adjacent to or within, for example, 250 metres of a minerals handling site. The actual extent of any such buffer will depend upon the nature of the proposed 'sensitive' use and on the specific impacts of the current minerals operation.

The MWSG states the following in relation to development proximate to the safeguarded site:

For proximate development, consideration will be given to whether it can proceed without compromising the ability of the [safeguarded] site to operate effectively or whether mitigation would reduce the sensitivity of the development to an acceptable level, in accordance with the 'agent of change' principle. Information that allows the MPA/WPA and LPA to make this assessment should be submitted with an application and should address matters including:

- *the distance of the proposal from the safeguarded site;*
- *any existing screening from buildings or vegetation;*
- *identification of pre-existing conditions such as background noise, light, odours, vibration, dust, and other emissions;*
- *the potential for the site to deliver suitable mitigation including the identification of the means by which the development has introduced layout, design, and other mitigation measures to mitigate potential effect on and from the safeguarded site;*
- *confirmation of pre-application consultation/engagement with the minerals or waste infrastructure operator (to demonstrate a full understanding of the existing and potential future operation of the site, including hours of operation, level of activity, and likely sources of noise, light, odours, vibration, dust, and other emissions);*
- *where appropriate, a full assessment of issues such as noise and light;*
- *statement of the overall compatibility of the development with the minerals or waste infrastructure.*

This report provides relevant information to demonstrate that the proposed development will not impact on the operations of the safeguarded minerals infrastructure.

2. Baseline

2.1 Safeguarded Minerals Infrastructure

The safeguarded minerals infrastructure is defined spatially in JLNP Policies Map 4 and consists of the following:

- An approximately 300m length of wharf on the north side of the tidal River Arun, extending approximately 50m from the river bank;
- An area occupied by a coated roadstone plant, north-west of the wharf, extending north-east to Bridge Road.

The Littlehampton Harbour Board 2020-21 Annual Report notes that the harbour leases two wharves to Tarmac Ltd, primarily for the import and storage of granite and steel slag used in its asphalt (coated roadstone) plant. Financial year 2020-21 saw 6 commercial vessels call at these wharves importing a total of 13,932 tons of roadstone cargo. This tonnage was affected by the Coronavirus pandemic; since 2012 the port has handled between approximately 10-30,000 tonnes of cargo per annum for Tarmac who are the sole commercial operator within the port. A commercial shipping income of £49,750 was recorded in 2020-21.

The coated roadstone plant operates under a Part B Environmental Permit issued by Arun District Council under the Environmental Permitting Regulations 2016 to Tarmac Trading Ltd. Westenviro has not obtained a copy of this permit, however typical conditions for such permits require pollution control and abatement measures to be implemented and limit allowable emissions of airborne pollution including particulates, odour, dust, noise and fumes. In considering sensitivity of developments to impacts from operations of the minerals infrastructure it may be assumed that the operations are compliant with the requirements of the environmental permit in place.

2.2 Proposed Development Site

The proposed development site is part of a larger manufacturing facility operated by Inpress Plastics, on the south-east side of Harwood Road. Inpress manufactures moulded plastic products and currently employs 72 full time members of staff. The site of the proposed development comprises the western half of the Impress site, currently occupied by ageing industrial buildings and a yard area. Prior to acquisition by Inpress it was previously a steel fabrication works.

The proposed development will replace part of one of the existing buildings, and the yard area, with a new larger and taller building with maximum height of 14 metres. The new building will be steel framed and profiled metal sheet clad. Polycarbonate roof lights will be provided in the roof. Wall cladding will not include any windows.

The proposed development is planned to take place following grant of planning consent, within the next three years.

The proposed development is intended to improve the efficiency and increase the capacity of the facility with a further 20 full time employees expected to be recruited over the next three years.

Key features of the development proposals relevant to the MIS are as follows:

- The site of the proposed development does not directly impinge on the safeguarded

minerals infrastructure area however it is within 250m of this area and therefore within the consultation zone;

- The site is to remain in use for manufacturing and although the development will allow expansion of current operations, the sensitivity of the site in relation to minerals infrastructure operations will remain unchanged;
- The proposed new construction is a steel framed and clad industrial building with no windows facing the safeguarded minerals area.



Abstract from Policies Map 4 showing mineral infrastructure (wharf and coated roadstone plant), annotated to show proposed development site and intervening development

3. Aspects Potentially Affecting Minerals Infrastructure

3.1 Aspects Considered

The following aspects relevant to minerals infrastructure are identified in minerals safeguarding guidance from West Sussex County Council and Minerals Safeguarding Practice Guidance prepared by the Mineral Products Association and the Planning Officers Society:

- Visual
- Noise
- Light
- Dust
- Odours
- Vibration
- Other Emissions
- Traffic

3.2 Current Impacts at the Proposed Development Site

Inpress Plastics management has confirmed that none of these aspects currently give rise to material impacts on the existing manufacturing operations at the proposed development site.

3.3 Visual

The development site is located 160m north-west of the safeguarded minerals infrastructure (at its nearest point) within an industrial estate. The sites are separated by the following:

- A hedgerow
- Bridge Road (B2187)
- Railway
- A tall gas holder
- A biological pest control factory
- Residential properties (facing Gloucester Road); and
- Further industrial premises.

The residential properties, gas holder and pest control factory provide a degree of visual screening, however given the lack of windows in the wall cladding of the proposed development, visual impact of the minerals operation on the proposed development is not considered to be a material aspect.

3.4 Noise

Sources of noise from the minerals infrastructure operations are considered likely to relate to minerals handling operations during ship unloading, and operation of the coated roadstone plant. As an industrial facility located within an industrial estate, 160m distant, the proposed development is not considered sensitive to noise from the mineral infrastructure operations. Existing residential properties on Gloucester Road, 50m from the wharf, are considered to be of greater sensitivity. Sources of noise at the coated roadstone plant will be controlled by the Part B environmental

permit. Noise impact from the minerals operation on the proposed development is not considered to be a material aspect.

3.4 Light

No light sources in the safeguarded sites with the potential to affect the proposed development are evident. Given the lack of windows in the wall cladding of the proposed development, light impact from the minerals operation on the proposed development is not considered to be a material aspect.

3.5 Dust

Sources of dust from the minerals infrastructure operations are considered likely to relate to minerals handling operations during ship unloading, and external materials handling operation of the coated roadstone plant. Dust generation from ship unloading is likely to be an occasional occurrence and dust from the coated roadstone plant will be controlled by the Part B environmental permit. Also given the distance of the proposed development from the minerals infrastructure, dust impact from the minerals operation on the proposed development is not considered to be a material aspect. Existing residential properties on Gloucester Road, 50m from the wharf, are considered to be of greater sensitivity.

3.6 Odours

Odours may be created by the operations of the coated roadstone plant involving heating of bitumen and cutting back with gas oil but these will be controlled by the Part B environmental permit. Also given the distance of the proposed development from the minerals infrastructure, odour impact on the proposed development is not considered to be a material aspect. Existing residential properties on Gloucester Road are considered to be of greater sensitivity.

3.7 Vibration

The minerals infrastructure is not considered to be a significant source of vibration.

3.8 Other Emissions

The minerals infrastructure is not considered to be a significant source of emissions other than those considered above.

3.9 Traffic

Increase in traffic from the proposed development is considered not to be significant. There is no direct link between Harwood Road, serving the proposed development, and Bridge Road, serving the wharf and coated roadstone plant. Access to the development site is obtained via the A284 and unclassified link roads; access to the safeguarded minerals sites is obtained via the B2187 Bridge Road and the A259. Traffic is therefore not considered to be a material aspect.

3.10 Contact with Minerals Infrastructure Operators

Given the lack of identified material aspects identified in relation to either existing or future operations at the proposed development site, it has not been considered necessary to consult with the minerals infrastructure operators.

4. Conclusions

4.1 Compatibility of Proposed Development with Minerals Infrastructure

Existing minerals infrastructure operations are not affecting current operations at the proposed development site. No aspects have been identified that are considered to be material to the proposed development, which is of a similar nature to the existing operation and is considered to be of low sensitivity to impacts from minerals infrastructure operations.

It is therefore concluded that the proposed development is compatible with the proximate minerals infrastructure.

4.2 Mitigation

As the proposed development is considered compatible with the proximate minerals infrastructure, no additional mitigation measures are considered to be necessary.

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