



Appeal Decision

Site visit made on 1 July 2025

by **S Wilkinson BA, BPI, Dip LA, MBA, MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 04 AUGUST 2025

Appeal Ref: APP/B3600/W/24/3356335

Dorking West Station Yard, Ranmore Road, Dorking, Surrey, RH14 1HU

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant [outline] planning permission.
- The appeal is made by Surrey Recycling Services against the decision of Surrey County Council.
- The application Ref is 2023-0112.
- The development proposed is a materials recycling facility including a building for the bulking up and processing of mixed skip waste, an office / welfare facility, storage units, skip storage, entrance gates and installation of an acoustic fence.

Decision

1. The appeal is dismissed.

Preliminary Matters

2. The County Council's evidence refers to changes to the operational management of the site which have occurred since its decision to refuse planning permission and that the site presently includes equipment which is not included in the appeal scheme. I understand this has now led to enforcement action being pursued by the County Council. Whilst the site may now be operating as a waste transfer station and that the County Council considers that parts of the proposed scheme are retrospective this decision addresses the scheme as originally submitted.
3. Policies referred to in this decision are included in the Surrey Waste Local Plan (SWLP) 2020, the Dorking Town Action Area Plan (DTAAP) 2012 and the recently adopted Mole Valley Local Plan (MVLN) 2024. My references to the District Council's policies relate to the local plan adopted in October 2024 and not to those referred to in the decision letter.

Main Issues

4. The appeal scheme raises the following main issues:
 - Whether or not it is inappropriate development and the effect of the proposal on openness and the purposes of including land within the Green Belt,
 - Its effects on highway safety,
 - Its effects on the environmental conditions of surrounding occupiers with specific reference to dust, fumes and noise, and
 - Its effects on living conditions and safety with regard to water quality.

Reasons

Green Belt

5. The National Planning Policy Framework, (the Framework) identifies that the fundamental aim of Green Belt policy is the prevention of urban sprawl by keeping land permanently open and that their essential characteristics are their openness and permanence. Paragraph 153 of the Framework requires that substantial weight is given to any harm to the Green Belt. The Council's adopted policies are broadly consistent with the Framework in resisting inappropriate development unless very special circumstances exist.
6. The majority of the appeal site is located within the urban area of Dorking with only a limited section of the existing access road included in the Green Belt.
7. Paragraph 143 of the Framework identifies that there are five purposes to the Green Belt. The access road does not lie on land which fulfils purposes a), b) and c). Accordingly, its use for access to the site would not lead to an unrestricted sprawl of built-up areas, prevent neighbouring towns merging or safeguard the countryside from encroachment. Purposes d) and e) are not relevant to this issue given that Dorking is not an historic town, and the scheme would not support regeneration.
8. Whilst there is some dispute between the parties on landownership of the section of the northern boundary proposed for the location of the acoustic screen, the drawings indicate that this is proposed to align with the site's northern boundary. The proposed screen would be 3m in height along part of this boundary and 2m above a building on the western site boundary. These locations lie on the edge of the Green Belt. Given its proposed height and the extent of Green Belt lying to the north of the site there would be no negative impacts on openness.
9. In conclusion, the appeal scheme would not conflict with policies MVLP EN1 and policy SWLP policy 9 and Paragraph 143 of the Framework. Accordingly, no assessment is required of the impacts of the scheme on openness.

Highway Safety

10. The scheme includes a vehicular access from Ranmore Road via a single (southern) track access road which serves the 'vehicular end of life' (ELV) facility located to the east of the site before linking to another single (northern) access track which extends to the site access. This track road also serves a car body repair shop to the west of the site, a riding school, allotments and residential caravan site to its north and provides pedestrian access to the community orchard. It is unlit and does not include footways.
11. The appellant identifies that the appeal scheme would generate around eleven vehicle trips each day although this is disputed by the Council which estimates that this could be around fifty. The details included in the appellant's technical note demonstrate that the proposed access from the northern track is of sufficient size to accommodate a HGV with appropriate sight lines. A swept path analysis indicates that both a tipper vehicle and small skip lorry could enter and leave the site in forward gear. I am satisfied that there would be sufficient space to accommodate these turning movements.

12. The appellant proposes a range of measures designed to address the potential for conflict between highway users including pedestrians, cyclists and other vehicles. These include pre booking of all deliveries, deliveries being made outside normal peak times, and that a briefing note and plan is sent to all HGV drivers intending to visit the site on its constraints.
13. I accept that whilst these measures could prevent the backing up of waiting vehicles onto Ranmore Road and address the objection from the school they would not prevent the potential for highway safety to be compromised from other vehicular users accessing and egressing the neighbouring land uses. The access road is of insufficient width to accommodate both two-way vehicular traffic, cyclists and pedestrians. Sight lines at the junction of the access road with Ranmore Road are constrained by the bridge over the railway and parked vehicles. Highway safety could be seriously comprised by this scheme.
14. The appellant's statement advises that additional measures could be incorporated into the design which could be conditioned, were I minded to allow this appeal. However, it is unclear what these measures are and whether they would involve neighbouring land outside their ownership.
15. Whilst the proposed mitigation measures offer a potential solution to prevent the backing up of HGVs on Ranmore Road they are insufficient to overcome the inherent constraints on access to this site. Whilst the existing access road already carries HGVs and other traffic, the appeal scheme would not comply with adopted policies and standards; it conflicts with policies SWLP15 and MVLP INF1.

Environmental conditions - air quality

16. The appeal site lies in close proximity to a number of receptors sensitive to dust and fumes arising from the site's proposed operations. St Mark's school, its playing fields and the Conifers Caravan Park are assessed as highly sensitive with the Downs Meadow stables identified as having a medium sensitivity to the proposed use¹. Adjacent commercial occupiers are identified as having a low sensitivity. I agree with this assessment.
17. Policies SWLP14 and MVLP EN12 both seek to minimise the exposure to and the emission of pollutants with particular reference to vulnerable people such as the elderly and children.
18. Whilst the prevailing wind direction across the site is from the south west the highly sensitive receptors could be particularly affected by dust and fumes from the proposed open storage containers lying within the site. However, between the site and these receptors is a broad belt of conifer trees along the northern edge of the access road which could absorb some of the dust and fume emissions. The scheme includes other measures designed to mitigate for dust and fumes which include suppression systems, tarpaulin covers, regular surface watering and wheel washing with all machinery designed to achieve low emissions.
19. A Dust Management Plan suggested by the County Council is a site specific operational plan designed to prevent or at least minimise the release of dust and fumes. The appellant suggests that this could be required by planning condition, were I minded to allow this appeal. I find that in the absence of this, a full detailed

¹ Dust Assessment

assessment of the impact of dust and fumes on surrounding receptors would not be possible; this is an important consideration which goes to the heart of this appeal.

20. Accordingly, I conclude that the appeal scheme conflicts with policies SWLP14 and policy EN12 of the MVLP.

Environmental conditions - noise

21. The appeal scheme includes sources of potential noise which include the trommel², the movement and tipping of skips, the excavator and pressure washer. The appellants report³ identifies that there would be significant adverse impacts, that is an increase in sound over 10dB, on the stables, riding school and caravan park, during the hours of operation. However, the survey did not account for the school and its playing fields as it was not open.
22. Policies SWLP14 and MVLP EN12 both seek to minimise the exposure to and the emission of pollutants with particular reference to vulnerable people such as the elderly and children.
23. In part, to address these localised impacts, the appellant identifies a range of measures e.g. dedicated skip lorries and the use of low noise machinery. Noise impacts would however, be significantly higher during Saturdays when the background noise levels would be lower resulting in significant adverse impacts experienced by the caravan park and the riding and sand school. The impacts would derive primarily from impulsive noise events in excess of around 20dBA above background noise levels and would be highly intrusive. To address this the NCIA recommends that no noise generating activities should be carried out on Saturdays.
24. In part to address these concerns the appeal scheme includes a 3m high acoustic screen located along the site's northern boundary adjacent to the road with a 2m high fence located atop the shed at the site's western boundary designed with a minimum mass of 10kg/sm. The appellant has, in response to the County Council's objection, stated that they could raise the height to 4m and increase the minimum mass to 15kg/sm.
25. Evidence on this matter from both parties is inconsistent in that the County's and District's noise assessments are based on existing operations which do not necessarily mirror all those proposed, whilst the NCIA does not include noise contour plots, topography and cumulative impacts.
26. For these reasons, in the absence of a fully comprehensive noise control impact assessment which addresses the proposed use, I conclude that the appeal scheme conflicts with policies SWLP14 and policy EN12 of the MVLP.

Water quality

27. The appeal site lies within 500m of source water boreholes and within Source Water Protection Zone 2. To prevent polluted water from the site entering these protected water sources, the appeal scheme includes an impermeable concrete slab and rain water run off would be captured in an Aco drain comprising three

² A rotating drum designed to separate material by size

³ Noise Control Impact Assessment

separate chambers. The appellant indicates that only household waste would be processed at the site thereby reducing the risks of pollution.

28. Policies SWLP14b) and MVLP EN12 require that development should not adversely impact on the quality of ground water, take account of source water protection zones and that water supplies should be protected and improved through the prevention of contaminated run off.
29. It is acknowledged that the Aco drain provides some degree of mitigation, but I give considerable weight to the objection of the Environment Agency in respect of appropriate details regarding the proposed drainage of both surface water and foul drainage.
30. The site has a history of waste management, and it is unclear what measures are proposed to either cap the site or identify a risk management strategy to address the environmental legacies of these uses. Whilst the plans indicate the location of a surface water drain running across the site it is unclear how this would work given the absence of details on the proposed slope of the concrete base, the extent of run off and capacity of the drain.
31. Given the central importance of surface water drainage and the proximity of this site in relation to source water protection zones the absence of appropriate details does not comply with adopted policies. Although the appellant states that further details could be addressed by a planning condition, the extent of changes necessary could alter the proposed layout of the site impacting on other concerns raised by this appeal.
32. For these reasons, I conclude that the appeal scheme conflicts with policies SWLP14b) and MVLP EN12 and INF3 which require that development should not adversely impact on the quality of ground water to account for source water protection zones and that supplies should be protected and improved through the prevention of contaminated run off.

Other Matters

Fallback position

33. The site is currently used as a Materials Recycling Facility (MRF) involving the importation, sorting, processing and storage of up to 7,500 tonnes per annum (tpa) of waste material primarily derived from construction, demolition and excavation with some household waste. Although the site has the benefit of a licence issued by the EA in 2022 as a MRF allowing the operation of a household, industrial and commercial waste transfer station with a capacity of 7,500tpa it does not have the benefit of planning permission for its existing operation.
34. The appellant refers to a 'fallback' position which could be exercised if this appeal is dismissed. The appellant's summary of the site's land use history included in the officer's report states that the site was used by a skip company during the 1980s and 1990s and then subsequently used as a scrap yard until the applicant began operating a recycling service.
35. The appellant is of the view that this land use history indicates that the site's lawful use in planning terms is as a scrap yard. However, there is an absence of evidence before me to support this position.

Overall planning balance

36. It is acknowledged that the appeal site lies in an area with a mixed pattern of land uses on a site immediately north of Dorking West rail station.
37. The proposed use would contribute to the National Planning Policy for Waste and the Waste Framework Directive and would be consistent with the County's waste strategy included in the SWLP. This is an important part of the County Council's waste hierarchy consistent with policies SWLP 1, 3 and 10. Furthermore, the site is previously developed land and whilst a small part lies beyond the boundary of the built-up area of Dorking, this is an existing access road. There would be no adverse impact on the openness of the Green Belt.
38. The scheme would have economic benefits including the employment of 9 FTE's. In these respects, the scheme would be consistent with Paragraph 85 of the Framework.
39. However, the nature of the proposed use in this location leads to significant highway safety and environmental concerns. This is a detailed scheme but lacks comprehensive details on the safeguards required for this use. These cannot be left to the submission of details required by planning condition once a decision to allow the appeal has been made.
40. I have considered the possibility of the fallback position advocated by the appellant. Whilst it is not my role to determine the lawful use of the site in this decision, I accord limited weight to the appellant's conclusions on this. There is not a clear body of evidence before me in support of their view that the site's fallback position could be a scrap yard and accordingly, I conclude that there would be a limited prospects of this use being reverted to.
41. I acknowledge that the County Council anticipates a shortfall in management capacity in the next few years for the processing of waste from construction, demolition and excavation. However, given my concerns identified above regarding the serious environmental impacts which could arise from this scheme these matters weigh significantly against it.
42. Taken together all these matters weigh against the appeal scheme despite the benefits which could arise.
43. For these reasons the appeal is dismissed, and planning permission is refused.

S Wilkinson

INSPECTOR

