


Planning Statement

 Change of Use of existing Warehouse buildings (B8 Use) to mixed- use of General Industrial (B2 Use) and Warehouse (B8 Use) and erection of storage silo's - Part Retrospective.

Land off Banks Road, Darlington, DL1 1YF

Document:

Planning Statement

Site:

Land off Banks Road, Darlington, DL1 1YF

Project:

Planning Application:

Change of Use of existing Warehouse buildings (B8 Use) to mixed use of General Industrial (B2 Use) and Warehouse (B8 Use) and erection of storage silo's-Part Retrospective.

Client:

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1. Introduction

- 1.1 Prism Planning has been engaged to prepare this Planning Statement and to provide planning advice, support and guidance in the preparation and submission of the planning application for change of use of existing warehouse buildings (B8 Use) to mixed use of general industrial (B2 Use) and warehouse (B8 Use) and erection of storage silos - part retrospective.
- 1.2 The application is submitted on behalf of North Yorkshire Polymers Ltd.
- 1.3 The following Planning Statement forms part of the planning application and should be read in conjunction with other documents submitted. The purpose of this Statement is to support the proposed development by setting out the context of the proposed development; outlining the policy framework relevant to the consideration of the subject planning application; and considering those matters relevant to land use planning and material to the consideration and determination of the subject planning application.
- 1.4 In addition to this Planning Statement, the planning application submission includes the following documentation:
- Architectural plans & drawings SMDesign Ltd
 - Acoustic Report Professional Consult
- 1.5 Through this Statement it will be shown that the proposed development represents an appropriate form of sustainable development and use of the site at this location and is acceptable in planning terms. Furthermore, it will be shown that the proposed development accords with relevant adopted and emerging local planning policies together with government guidance as set out in the Revised National Planning Policy Framework, 2019.

2. The Site Context and Planning History

2.1 The Site and Surrounding Area

- 2.1.1 The application site extends to approximately 2,250m² (0.55a) and lies on the western side of Bank Road, an industrial cul-de sac road which takes its access off McMullen Road.
- 2.1.2 The area lies to the rear (west) of a complex of numerous car dealerships and is industrial in its general character. Of particular note is the preponderance of vehicle accident recovery operations taking place off Bank Road, many of which operate on a 24/7 basis.
- 2.1.3 Directly to the north of the application site lie two linked industrial buildings, sub-divided into a series of small business operations.
- 2.1.4 To the east lies Bank Road from which the application takes its access, beyond which lie a series of car storage compounds associated with the main car dealerships fronting Mc Mullen Road.
- 2.1.5 To the south is a vehicle bodyshop containing two large industrial buildings and associated external storage of repaired and damaged vehicles.
- 2.1.6 To the west of the site lies the grounds of St Aidan's Academy School.
- 2.1.7 Photographs of the site and surrounding area are attached as Appendix 1.

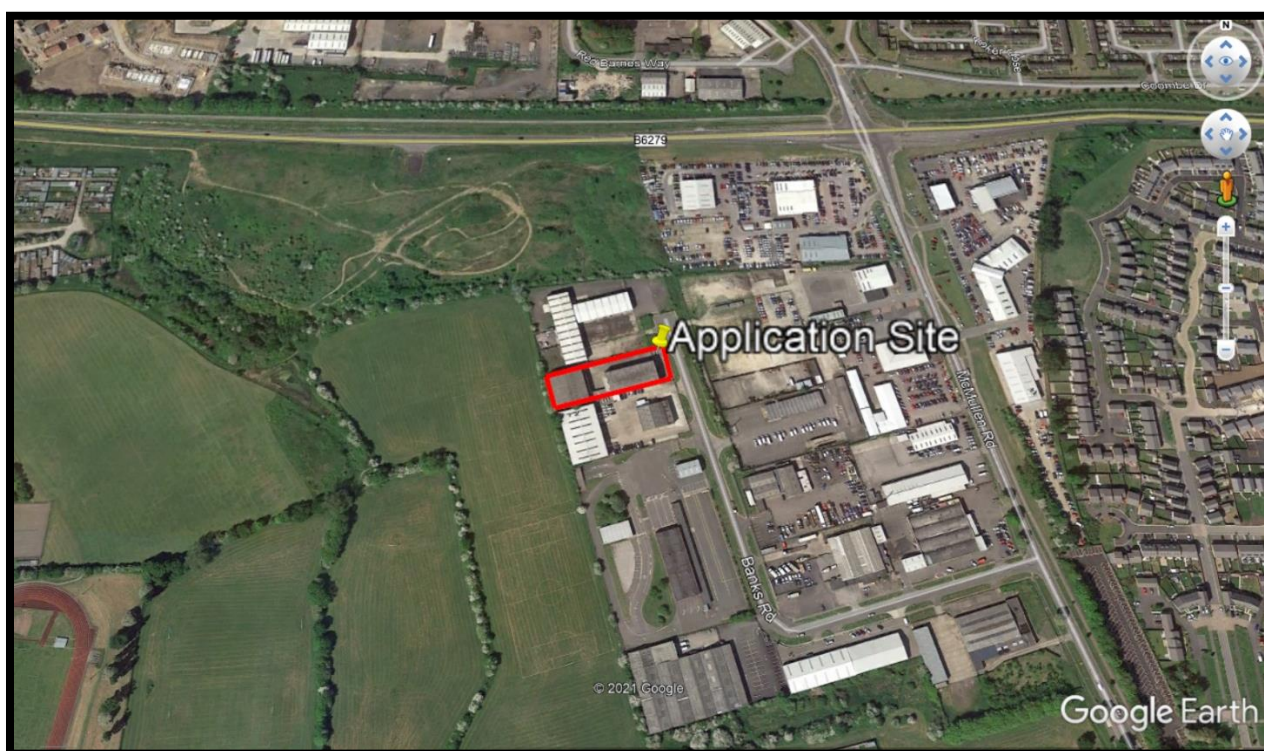


Figure 1: The Site and Surrounding area. Source: Google Earth (image upload date May 2018)

- 2.1.8 The application site itself consists of two separate portal frame industrial buildings. The front building, occupying approximately two thirds of the lot width has a brick front to Banks Road with metal cladding to its sides. This building contains offices and storage elements and has an internal access road along its northern boundary to the rear of the site.

- 2.1.9 A weighbridge has been installed under this access road and is included within the scope of this application, although it has virtually no visual impact whatsoever, despite technically constituting operational development.
- 2.1.10 The rear building, located hard up against the western boundary, extends across the full width of the site and is portal framed with cement sheet cladding. It is currently in B2 use, being used to process grades of plastic material into a new granular material that can be re-used.
- 2.1.11 The site lies wholly within Flood Zone 1 and is therefore considered to be at a low risk of flooding.

2.2 Planning History

- 2.2.1 The buildings originally the subject of this application are understood to have been erected in 1976 as part of a B8 development approved under reference number 76/00617/SU. Accordingly, there is no current consent for any B2 operations to occur.
- 2.2.2 A later application in 1978 suggest that the buildings were in use at that time as a garage depot. There is no more recent history relating to the site.

3. Proposed Development

- 3.1 The applicants process grades of plastics obtained from a variety of sources that are transported to the site by HGV in bulk bags such as that shown below.



- 3.2 The material is tested, assessed and stored in the front building as highlighted below.



Figure 2 - Plastic Product stored in existing front warehouse

- 3.3 The stored material is then taken into the rear building by forklift truck and processed and blended through a series of machines to produce a granular material, which is a recovered and re-usable material, useable in plastic injection machinery to produce a range of products.
- 3.4 The recovered product is currently taken off site by lorry in bulk bags but in future it is also proposed for HGV tankers to be loaded from the proposed silos detailed in the application.



3.5 The processed material shown below is currently loaded into bulk bags for re-use.



3.6 It is intended that the granular material will in future be stored in stainless steel silos for bulk load transfers via tankers. The silos have been purchased and stored at the site but have not yet been commissioned, pending the outcome of this application. The silos would be located immediately outside the eastern wall of the rear process building. The silos are simply bolted to the floor and would be ducted into the building. An image of the silos is contained below.



- 3.7 There is also a dust suppression and filtration system within the building due to be commissioned once new plant has been delivered to the site.
- 3.8 At present an external generator has been operating on site to provide a suitable three phase power supply. This has been a temporary arrangement pending the upgrade of the main supply to the site which has been delayed because of Covid impacts. Once the new supply is made available, the generator will be removed from the site.
- 3.9 The current operations at the site take place on a 24-hour basis, from Monday through to Friday. Accordingly, consent is sought for a continuation of those hours. It is also proposed that operations should be permitted on Saturdays, there being no rational basis or need for any restrictive conditions to be applied, no noise sensitive receptors being close to the site. It will also be appreciated that some of the existing operations in Banks Road also operate on a 24/7 basis.
- 3.10 It will be appreciated that there is a growing demand for plastic recycling and products made from recycled plastics as part of continuing efforts to progress a circular economy.

4. Planning Policy Review

4.1 Introduction

- 4.1.1 The statutory development plan (referred to as ‘the Development Plan’ hereafter) is the starting point for decision making and is indicated to be of paramount importance under the Town and Country Planning Act 1990, as reaffirmed by the Planning and the Compulsory Purchase Act 2004. For Darlington, the Development Plan presently comprises parts of the adopted Local Plan from 1997 as well as the Core Strategy adopted in 2011. Applications should be determined in accordance with the Development Plan unless other material considerations indicate otherwise. Central government guidance, particularly where it post-dates older development plans, can also be particularly relevant.
- 4.1.2 Relevant policies of the Local Plan and Core Strategy will be considered below.
- 4.1.3 Government planning policy relevant to the consideration of this proposal is set out in the National Planning Policy Framework, revised in July 2021. The National Planning Policy Framework (The Revised Framework) sets out the national requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. Although not a statutory component of the development plan, The Framework is the most significant of material considerations and significant weight is therefore to be given to this policy document. Relevant extracts of The Framework will be considered below.

4.2 Local Planning Policy

Borough of Darlington Local Plan (1997)

- 4.2.1 There are two ‘saved’ policies of the Borough of Darlington Local Plan that are considered to bear relevance to the consideration and determination of the subject planning application. These policies are summarised below.

Policy E2 – ‘Development Limit’

- 4.2.2 Policy E2 advises that most new development will for the plan period will be located inside the development limits as defined on the Proposals Map.

Policy EP2 – ‘Employment Areas’

- 4.2.3 Policy EP2 advises that permission will be granted for business (Use Class B1, now Use Class E parts c (financial services, professional services (other than health or medical services) and any other services which it is appropriate to provide in a commercial, business or service locality) and g (offices, research and development facilities and light industrial uses)) uses within existing employment areas, including Banks Road. General industry (Use Class B2) and warehousing (Use Class B8) uses will be permitted where they do not harm the amenity of the area or nearby residential areas. Development will not be permitted if its access is via a residential street and it will have a material adverse impact on residential amenity. Where practicable, access should be obtained from streets not in residential use.

Darlington Core Strategy (2011)

4.2.4 There are four Core Strategy policies that are considered to bear relevance to the consideration and determination of the subject planning application. These policies are summarised below.

Policy CS1 – ‘Darlington’s Sub-Regional Role and Locational Strategy’

4.2.5 Policy CS1 advises that new development and regeneration activity in the Borough will be concentrated on sustainable locations within the main urban area, where there is actual or potential good accessibility for everybody.

Policy CS2 – ‘Achieving High Quality, Sustainable Design’

4.2.6 Policy CS2 advises that high quality, safe, sustainable and inclusive design will be promoted in all new developments.

Policy CS5 – ‘The Provision of Land for Employment Purposes’

4.2.7 Policy CS5 advises that a continuous and diverse supply of employment land to meet the needs of existing and future economic development will be provided in appropriate locations, according to the locational strategy set out in Policy CS1. With reference to the subject proposal, also advises that existing viable employment sites will be protected by safeguarding them for employment uses only or for mixed uses, where appropriate. Exceptions will be made where certain qualifying criteria are met.

Policy CS16 – ‘Protecting Environmental Resources, Human Health and Safety’

4.2.8 Policy CS16 advises that new development should protect and, where possible, improve environmental resources, whilst ensuring there is no detrimental impact on the environment, general amenity and the health and safety of the community.

Emerging Darlington Local Plan

4.2.9 There are two policies of the emerging Local Plan that are considered to bear relevance to the consideration and determination of the subject planning application. These policies are summarised below.

Policy H3 – ‘Development Limits’

4.2.10 Policy H3 advises that developments proposed within the limits identified on the Policies Map will be deemed acceptable in principle subject to compliance with other relevant national and local policies.

Policy E1 – ‘Safeguarding Existing Employment Opportunities’

4.2.11 Policy E1 advises that a number of existing employment areas, including Banks Road will be promoted and safeguarded for existing and ongoing economic investment. Within these areas, planning permission will be granted in line with the 'suggested uses' of each site set out in the Policy. Proposals for other employment uses not falling within the 'suggested uses' of specific sites will only be permitted where the Borough Council is satisfied that they will not have a detrimental effect on the amenities of the occupiers of adjoining or nearby properties or prejudice the development of adjacent sites. The suggested uses for Banks Road are for business (Use Class B1, now Use Class E parts c (financial services, professional services (other than health or medical services) and any other services which it is appropriate to provide in a commercial, business or service locality) and g (offices, research and development facilities and light industrial uses)), general industry (Use Class B2) and Sui Generis Uses.

4.3 National Planning Policy & Guidance

National Planning Policy Framework

4.3.1 The National Planning Policy Framework (The Revised Framework), updated and re-published in July 2021, sets out the Government’s planning policies for England and advises how these are expected to be applied. It sets out the national requirements for the planning system, but only to the extent that it is relevant, proportionate and necessary to do so. The Framework is a material consideration in decisions on planning applications and appeals.

4.3.2 Paragraph 38 of The Framework is of key importance with reference to the consideration of planning applications and states:

“Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.”

4.3.3 Paragraph 47 refers to the determination of applications and acknowledges that the planning system is plan-led and that planning law requires that planning applications be determined in accordance with the development plan, unless material considerations indicate otherwise, and advises that decisions on applications should be made as quickly as possible and within statutory timescales, unless a longer period has been agreed by the applicant in writing.

4.3.4 At paragraph 7, The Revised Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 advises that there are three overarching objectives to sustainable development: economic, social and environmental and that they are interdependent and should be pursued in mutually supportive ways. Paragraph 9 advises that the three sustainable objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework and stresses that they are not criteria against which every decision can or should be judged. Indeed, local circumstances should be taken into account, to reflect the character, needs and opportunities of each area.

The Presumption in Favour of Sustainable Development

4.3.5 Paragraphs 10-14 of The Framework refer the presumption in favour of sustainable development. Paragraph 10 advises that the presumption in favour of sustainable development is at the heart of The Framework. With reference to the determination of planning applications, paragraph 11 advises that this means:

- *“approving development proposals that accord with an up-to-date development plan without delay; or*
- *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

4.3.6 The Framework identifies a number of ways in which sustainable development can be delivered. Those relevant to the subject proposals will be considered below.

Building a Strong, Competitive Economy

4.3.7 Paragraph 81 advises that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. In this regard, significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

4.3.8 Paragraph 83 calls for flexibility, whereby LPAs should be willing to accommodate needs not anticipated in the development plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances.

Promoting Sustainable Transport

4.3.9 Paragraph 104 advises that transport issues should be considered from the earliest stages of plan-making and preparing development proposals, so that:

- a) *“the potential impacts of development on transport networks can be addressed;*
- b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) *opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) *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; and*
- e) *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”*

4.3.10 Paragraph 105 advises that the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. The Framework acknowledges, however, that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and advises LPAs that this should be taken into account in both plan-making and decision-making.

4.3.11 Paragraph 107 refers to parking standards for residential and non-residential development, advising that local planning authorities should take into account:

- *“the accessibility of the development;*
- *the type, mix and use of development;*
- *the availability of and opportunities for public transport;*
- *local car ownership levels; and*
- *the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.”*

4.3.12 Paragraph 111, refers to the consideration of traffic impact arising from new development, advising that “development should only be prevented or refused on transport grounds if there would be an unacceptable impact on highway safety, or the residual impacts on the road network would be severe”.

Making Effective Use of Land

4.3.13 Paragraph 119 refers to changing demand and alternative uses for land and states:

“Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

- a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and*
- b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.”*

Meeting the Challenge of Climate Change, Flooding and Coastal Change

4.3.14 Paragraph 152 advises that new development should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

5. Material Planning Considerations

5.1 Introduction

5.1.1 The proposed development has been assessed against national and local planning policy and guidance and other material planning considerations. It is considered that the key planning issues relevant to the consideration and determination of the subject planning application are:-

- The principle of development;
- Sustainability;
- Amenity Considerations;
- Highways considerations;
- Flooding and drainage;
- Accordance with planning policy; and
- The benefits of the proposed development.

5.2 The Principle of Development

5.2.1 The application site is located within the development limits of the Town, and is in an area wherein the old Local Plan at EP 2 and the emerging Local Plan at E1 seeks to accommodate a range of similar scope of industrial uses.

5.2.2 Accordingly, the principle of this type of use and activity is concordant with established and proposed policy objectives for the area and the proposed development is acceptable in principle.

5.3 Sustainability

5.3.1 The National Planning Policy Framework has at its heart the clear presumption in favour of sustainable development with the instruction that planning applications which propose sustainable development should be approved without delay. Paragraph 7 of The Framework identifies three overarching objectives sustainable development, namely: the economic objective; the social objective; and the environmental objective. As paragraph 8 stresses, these roles should not be viewed in isolation since they are mutually dependent, and the goal of sustainable development will be achieved through economic, social and environmental gains being sought jointly and simultaneously.

5.3.2 The proposed development represents a use which is part of the developing circular economy relating to the re-use and recovery of plastics from manufacturing streams. As such it represents one of the most sustainable forms of development that is possible, contributing to all three sustainability headings and helping to reduce the amount of plastic that might otherwise go to landfill or incineration, both undesirable forms of disposal in accordance with the established waste hierarchy.

5.3.3 The site is not subject to any site-specific environmental or landscape designations and has no sensitive receptors such as housing immediately adjacent to it.

5.3.4 In light of the above, it is considered that the proposals represent sustainable development. It accords with guidance set out at paragraphs 7 and 8 of The Framework and accords with Core Strategy Policies CS1,2,5 and 16.

5.3.5 As a consequence, paragraphs 10-12 of The Framework should be noted and an initial view be taken that the application be approved unless other material planning considerations indicate otherwise. These other material considerations will be considered below.

5.4 Design and Layout

5.4.1 The proposals involve a limited amount of external development with the only significant feature being the incorporation of the proposed stainless steel storage silos, the weighbridge being practically invisible as a below ground structure.

5.4.2 The proposed silos would be located in the centre of the site, where the majority of their visual impact would be shielded by the mass of the two large warehouse buildings.

5.4.3 Whilst they can be seen from public vantage points, as evinced by Figure 3 – (a street-scene photograph taken from Banks Road to the south of the site), their visual impact is minimal and certainly far from incongruous as detailed in Figure 3 below:



Figure 3 - View from Banks Road looking north towards application site.

5.5 Amenity and Noise

- 5.5.1 In preparing the application, the applicant was conscious of perceptions about 24 hour working giving rise to concerns over noise nuisance. Accordingly, a full noise survey was commissioned of operations. The report, prepared by Professional Consult (PC) forms part of the application.
- 5.5.2 The noise specialists were able to accurately measure noise from existing operations, as well as undertake a full background noise survey and the team in question had preliminary discussions with DBC Environmental Health officers over the parameters of the study.
- 5.5.3 The nearest noise sensitive receptor to the site was considered to be the residential development approximately 290m to the south of the site and noise measurements were taken close to this location, as detailed in the PC report, and the report notes at Table 6, four specific locations where sound measurements were taken, as well as at the site itself.
- 5.5.4 Measurements were also taken of equipment operating at the site, including the temporary generator which is only being used pending the upgrade of the main cable to the site and will be removed within 3 months under normal conditions.
- 5.5.5 The relevant British Standard assessment considers the impact of potential noise within the dwelling at night and within the garden area during the day, acknowledging that background noise levels are higher during the day than the night. Allowances are built into the standard for the attenuation levels of partially open windows.
- 5.5.6 The results of the survey show that under either daytime or night-time conditions, the development does not have an adverse impact upon residential amenity and does not require any form of acoustic mitigation in place.
- 5.5.7 As a result of the noise survey, it is clear that the operation does not have an unacceptable impact in terms of noise under any scenario.
- 5.5.8 It is also noted that as the existing operation has been taking pace for a number of months, it has been possible to determine conclusively that the operation does not give rise to any litter or stray emissions beyond the boundary of the site, with operations being confined to the inside of the process building. Once the silos are commissioned, there is even less potential for fugitive emissions due to the sealed nature of their operation.
- 5.5.9 Accordingly, it is not considered that the operations raises any material considerations relating to noise or fugitive emissions.

5.6 Highway Considerations

- 5.6.1 The application site is already provided with an HGV standard of access onto Banks Road which is also suitable for HGV traffic. There are not considered to be any issues relating to the use of that access which it is noted could lawfully be more intensive than the present use, if both buildings were being used for warehouse purposes.
- 5.6.2 Accordingly, having regard to the threshold of highways impacts set out at Paragraph 111 of the updated Framework, the highway impacts associated with the operation are not considered to give rise to any concern or policy conflict.

5.7 Flooding and Drainage

- 5.7.1 Reference to 'The Flood Map for Planning' indicates that the site lies within Flood Zone 1 and is at the lowest risk of fluvial flooding (flooding by rivers or water courses), see Figure 4 below.
- 5.7.2 Furthermore, the Flood Map indicates that the site is not at risk of flooding from reservoirs, see Figure 5 overleaf.
- 5.7.3 Similarly, there is a negligible risk of surface water flooding with none affecting the site itself and only a slight increase in risk on a short section of Banks Road.
- 5.7.4 Existing foul and surface water arrangements are unaffected by the proposed change of use.



Figure 4: Fluvial Flood Risk - Source: Environment Agency Flood Map (July 2021)

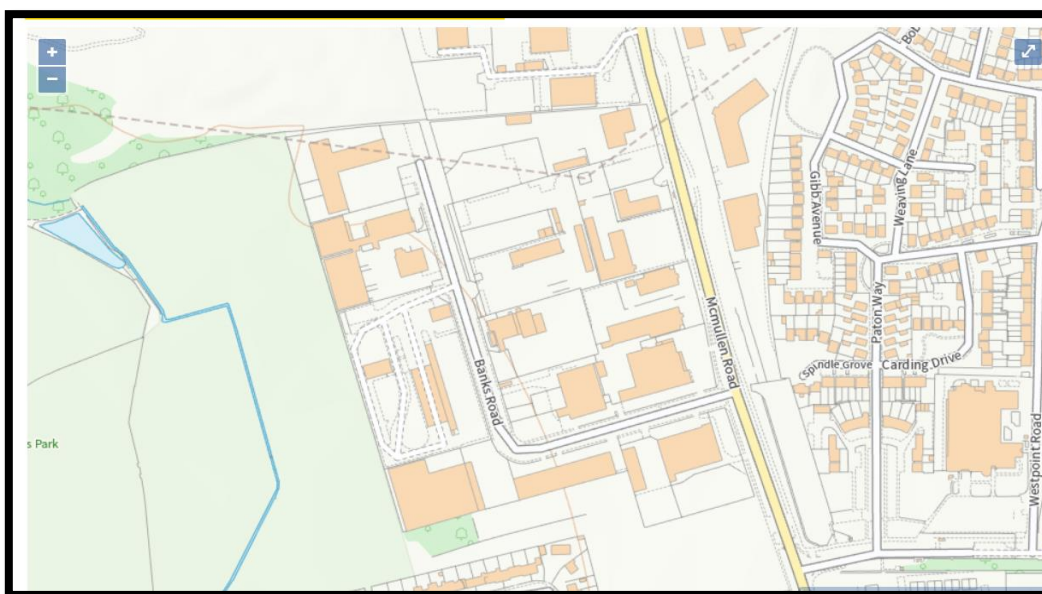
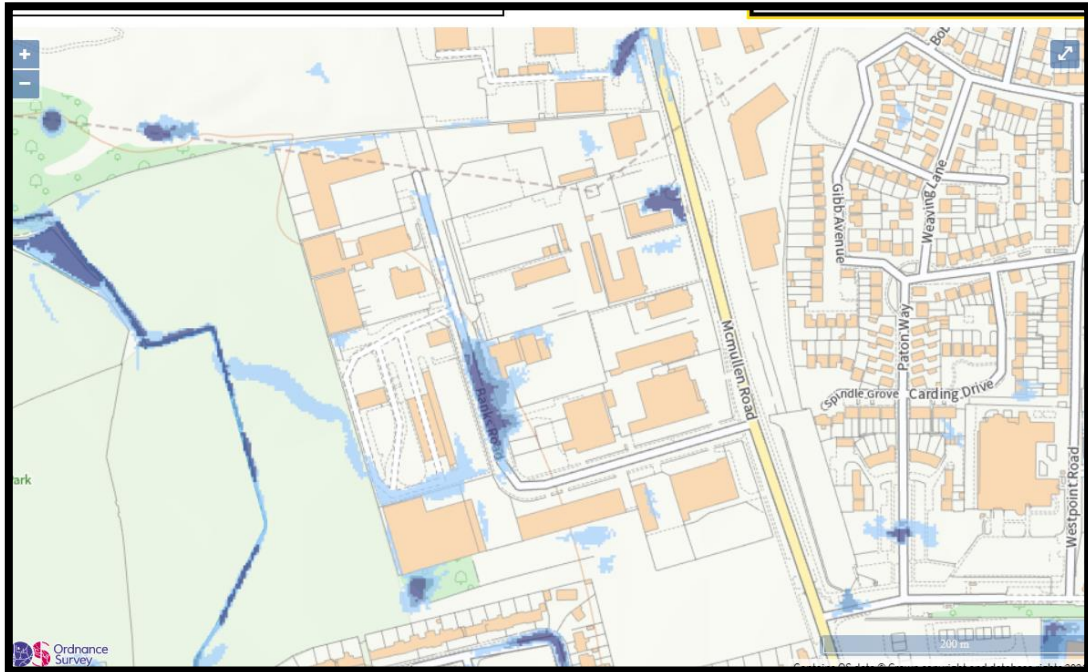


Figure 5: Flood Risk from Reservoirs - Source: Environment Agency Flood Map (July 2021)



5.8 The Benefits of the Proposed Development

5.8.1 The proposed development will bring with it a series of economic, social and environmental benefits.

5.8.2 The economic benefits may be summarised as follows:

- The re-use of an otherwise empty building.
- Direct job creation/retention for employees in the new enterprise.
- Through the multiplier effect, new jobs creation indirectly associated with the site, through haulage and food sector etc.
- Additional expenditure in the local economy by employees of the proposed units frequenting local shops, cafes, restaurants, public houses and other services in Darlington and the wider locality, thereby improving their viability;
- Supporting economic growth within the local area; and
- An increase in the number of economically active residents;

5.8.3 The social benefits may be summarized as follows:

- Bringing forward the re-use of an empty building in an accessible location will support the creation of a strong, vibrant and healthy community;
- The proposed development will provide a distinctive and good quality commercial development that will benefit the site, wider locality and Darlington Borough;
- The occupiers and employees of the business will add to the local vitality, making use of the local commercial, social and recreational facilities.

5.8.4 The environmental benefits may be summarized as follows:

- The application site and its immediate surroundings are not subject to any specific environmental or landscape designations;

- The proposed development is a significant new green industry for the Town and part of the drive for a circular economy that reduces reliance upon raw materials, reduces material going to landfill and/or incineration.
- The application site is located within Flood Zone 1 and is therefore at the lowest risk of flooding; and

5.9 The Planning Balance

5.9.1 It has been demonstrated that all material planning considerations have been addressed and satisfied. Moreover, it has been shown that the proposed development is policy compliant with reference to prevailing local planning policies and the updated National Planning Policy Framework.

5.9.2 Accordingly, taking note of the prevailing message of The Framework, the presumption in favour of sustainable development, and the call for development proposals that accord with the development plan to be approved without delay, it is contended there is no good reason why planning permission in respect of the proposed development should not be granted.

6. Summary and Conclusion

6.1 Summary

- 6.1.1 This planning application seeks planning permission for the change of use of a site previously used solely for B8 (Storage and Warehouse) purposes for one which comprises a mixed-use involving elements of B2 (General Industrial Development) alongside continued B8 (Storage and Warehouse) uses at the site.
- 6.1.2 It has been shown that consistently over time the area has been identified in both previous and emerging Local Plans as being eminently suitable for this type of development which is in keeping with the over character of the area. It is a policy compliant proposal.
- 6.1.3 The only emission from the site is noise and a careful and detailed noise survey has shown that the noise impacts of the operation do not give rise to any adverse impacts at any of the nearest noise sensitive development, namely housing areas to the south of the site.
- 6.1.4 The development is not at risk of flooding and does not increase the risk of flooding to others.

6.2 Conclusion

- 6.2.1 In conclusion and in light of the above, it is submitted that the proposed development is acceptable and represents an appropriate form of sustainable development for the site.
- 6.2.2 Accordingly, it is hoped that the Local Planning Authority will look favourably upon this planning application and grant planning permission subject to appropriate conditions. Notwithstanding, we remain willing to discuss any aspect of the proposed development with the Local Planning Authority, should this be necessary and/or desirable.

7. Appendices

Appendix 1: Photographs of the Site and Surrounding Area



Photo 1 – Plastic imported to the site in its un-processed form, prior to granulation.



Photo 2 – Warehouse 2 containing both processed and raw product.



Photo 3 – Storage silos not yet commissioned.



Photo 4 - Bagging machine.



Photo 5 – Granulator and loading machines.



Photo 6 – Granulated product undergoing further processing and refinement.



Photo 7 – View along Banks Road looking northwards towards site.



Photo 8 – View towards site from cul-de-sac head at end of Banks Road.