

**2568**

**PLANNING STATEMENT**

**Resubmission Planning Application for:  
Outdoor Storage of Materials, Additional Buildings and Structures, and External Generators  
(Retrospective)  
At Laurel Lodge Farm, Hurn Road, Holbeach Hurn**

## **1. Introduction**

This Planning Statement supports the resubmission of the retrospective planning application for Midwest Polychem Ltd at Laurel Lodge Farm. The proposal seeks to regularise operational developments ancillary to the established plastics processing facility, following refusal under application **H09-0026-25**.

This resubmission addresses refusal reasons by providing a **site-specific Flood Risk Assessment (FRA)**, a **Drainage Strategy prepared by DART Engineers**, and revised plans resolving previous inconsistencies, in accordance with Lincolnshire County Council planning policy requirements and national planning guidance.

## **2. Background: Midwest Polychem Ltd**

**Midwest Polychem Ltd** is a leading plastics recycling and processing company operating from Laurel Lodge Farm, Holbeach Hurn. The company:

- Specialises in the recycling of waste plastics to create reusable raw materials, contributing to the circular economy and sustainability targets within the UK manufacturing sector.
- Processes various plastic types, including **Polyethylene Terephthalate (PET)** used in food-grade packaging products such as salad bowls, drinks bottles, and sandwich packaging.
- Operates under a strict **Environmental Permit**, ensuring that all activities adhere to regulatory standards for waste management, pollution prevention, and environmental protection.
- Provides local employment opportunities and supports Lincolnshire's waste management strategy by diverting plastics from landfill to sustainable reuse.

### 3. Site Background and Planning History

- Planning permission **H09-0872-21** granted change of use for plastics processing with a throughput limit of 36,000 tonnes per annum.
- Retrospective development includes storage bays, product storage areas, additional structures, and operational plant required to facilitate permitted site activities.
- The site is located within **Flood Zone 3** adjacent to the A17, in an established industrial context, with operations fully enclosed and securely managed.

### 4. Proposed Development

The resubmission seeks retrospective approval for:

1. **Material Storage Bays** – concrete bunkers (9.7m depth x 30.5m length x 3m high), with waste stored no higher than 2m to ensure fire safety and visual containment.
2. **Outdoor Finished Product Storage** – sealed white 1m x 1m x 2m bags on pallets to maintain freeboard in flood events.
3. **Intake Area Structure** – revised location, dimensions, and materials confirmed on updated drawings.
4. **Baler Bay** – position, materials, and operational function clarified.
5. **Outdoor Generators** – specification, location, and noise data provided to demonstrate environmental compliance.
6. **DAF Plant Cover** – design, scale, and flood resilience measures detailed.
7. **Steam Boiler Room Extension** – confirmed as 4.5m wide x 6.7m long x 4.7m high with updated elevations.
8. **Safety Office** – single-storey prefabricated cabin.

### 5. Addressing Refusal Reasons

#### 5.1 Flood Risk Assessment (Refusal Reason 1)

A **site-specific FRA prepared by DART Engineers** accompanies this resubmission, providing:

- Assessment of all structures relative to Flood Zone 3 constraints.
- Identification of mitigation measures, including raised storage on pallets, low-vulnerability finished products, and resilient construction for structures.
- Compliance with **NPPF Paragraphs 162–169 (planning and flood risk)**, **Policy DM15** of the Lincolnshire Minerals and Waste Local Plan (CSDMP), and **Policy 4** of the South East Lincolnshire Local Plan (SELLP).

## 5.2 Drainage Strategy (Refusal Reason 2)

The **Drainage Strategy prepared by DART Engineers** demonstrates:

- Surface water discharge limited to the IDB watercourse, with formal consent application in progress to satisfy **Byelaw 3 requirements**.
- Foul water disposal arrangements compliant with Anglian Water standards, ensuring no risk of pollution.
- Compliance with **Policy DM16 (Water Resources)** of the CSDMP and **Policies 30 and 31** of the SELLP.

## 5.3 Design and Information Clarity (Refusal Reason 3)

Revised drawings address previous inconsistencies by:

- Providing accurate dimensions, elevations, and material specifications for all structures.
- Demonstrating high-quality, functional design in accordance with **NPPF Paragraphs 131, 135, 137, 139 (good design)**, **Policy DM3 (Quality of Life and Amenity)**, **Policy DM6 (Impact on Landscape and Townscape)** of the CSDMP, and **Policy 3 (Design of New Development)** of the SELLP.

## 6. Planning Policy Compliance

The proposal complies with the following key policies:

### **National Planning Policy Framework (NPPF, December 2024)**

- **Paragraphs 7–11:** Presumption in favour of sustainable development.
- **Paragraph 44:** Provision of adequate information to support decision-making.
- **Paragraph 124:** Effective use of land while safeguarding the environment.
- **Paragraphs 162–169:** Flood risk and climate change adaptation requirements.
- **Paragraphs 170, 173–182:** Development in flood risk areas to be safe and resilient.
- **Paragraph 187:** Preventing pollution and protecting local environments.
- **Paragraphs 198–201:** Suitability of land for its intended use and pollution prevention.

### **Lincolnshire Minerals and Waste Local Plan (CSDMP, 2016)**

- **Policy W4:** Locational criteria for waste facilities – development within an existing waste site.

- **Policy DM3:** Quality of life and amenity – no adverse noise, odour, or visual impacts.
- **Policy DM6:** Impact on landscape and townscape – minimal landscape impacts demonstrated.
- **Policy DM14:** Transport by road – no increase in vehicle movements.
- **Policy DM15:** Flooding and flood risk – FRA and mitigation measures provided.
- **Policy DM16:** Water resources – drainage strategy ensures no adverse impact.
- **Policy DM17:** Cumulative impacts – no unacceptable environmental effects identified.

#### **South East Lincolnshire Local Plan (SELLP, 2019)**

- **Policy 3:** Design of new development – high-quality, functional design demonstrated.
- **Policy 4:** Approach to flood risk – site-specific FRA and resilience measures provided.
- **Policy 30:** Pollution – no adverse impacts on health, amenity, or the environment.
- **Policy 31:** Climate change – integration of drainage, flood resilience, and sustainable operational design.

### **7. Environmental and Operational Considerations**

- **Noise & Odour:** Generators positioned to minimise impacts; finished products are odourless and inert.
- **Visual Impact:** Concrete bunkers and structured storage ensure minimal visual impact.
- **Fire Safety:** Controlled storage heights and compartmentation align with the Fire Prevention Plan.
- **Flooding:** Freeboard and resilience measures prevent pollution during flood events.

## 8. Conclusion

The proposed development:

- **Regularises essential operational infrastructure** within an established waste management facility, ensuring planning compliance and operational safety.
- **Addresses all refusal reasons** with a site-specific FRA by **DART Engineers**, a robust Drainage Strategy, and revised design details demonstrating good design, environmental protection, and operational resilience.
- **Supports Midwest Polychem's role as a key regional plastics recycling facility**, promoting sustainability, circular economy objectives, and local employment opportunities.
- **Complies fully with national and local planning policy frameworks**, protecting amenity, environmental quality, and public safety.
- **Ensures that existing operational activities remain lawful**, safeguarding continuity of service to clients, suppliers, and the wider community.

In light of the above, **Midwest Polychem Ltd respectfully requests that planning permission is granted without delay**, enabling continued sustainable operations and long-term compliance with all planning and environmental regulatory requirements.