

fluid planning

**Wadhurst Household
Waste Site
TN5 6PT**

**Planning Statement
0328**

Contents

3	Introduction
3	Planning History
4	Planning Considerations
11	Summary

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1.0 Introduction

- 1.1 This application is for change of use from a household waste recycling site to an aggregates recycling and metal recycling site, including the processing, storage and transfer of waste, and the siting of two welfare offices.
- 1.2 The site was formerly a household waste and recycling centre ('HWRC') owned by East Sussex County Council ('ESCC'), until marketed for sale in February 2020. The site is safeguarded as an HWRC site under the East Sussex Local Waste Site Plan¹.
- 1.3 The site comprises a fenced yard consisting of concrete hardstanding, with boundary fencing, double entrance gates and electricity and drainage. It sits adjacent to Wadhurst Business Park and close to the London-Hastings railway line and Wadhurst station. The site is not located in the Green Belt, but falls within the High Weald AONB.
- 1.4 The proposed change of use will require one 360 degree digger on site, together with sorting bays, and a crusher or screener, in addition to the two welfare offices. No alterations to the existing hard standing or fencing will be required. All the development will sit within the Site which already benefits from retained walls on three sides, acting like a natural acoustic bund.
- 1.5 The proposed development will ensure the ongoing safeguarding of the site as a waste site, while providing valuable capacity for processing and recycling of construction, demolition and excavation waste ('*CDEW*'), in a sustainable location. It will have no additional impact on the character and appearance of the area beyond that of the existing site operating within the lawful use.
- 1.6 The description of development is:
- Use of site as a waste transfer station for construction and demolition waste and installation of two offices.**
- 1.7 On site plant is likely to comprise:
- McCloskey R105 Screener with HX 140L Excavator;
 - McCloskey J40 V2 Crusher;

1 Appendix B (ref SP-WCA/AO; map at p136).

- TrommALL 3500TR; and,
- Lorry Loading with Hitachi ZW180 Loading Shovel.

1.7 On site parking provision is provided for 7 private motor vehicles.

1.8 The likely vehicle movements are expected to total 20 HGV deliveries daily resulting in 40 two-way movements. The throughput of material is predicted to be 30,000 metric tonnes per annum. Proposed hours of operation are:

- 07:00 - 17:30 Monday to Friday;
- 07:30 -13:00 Saturdays; and,
- No working on Sunday or Bank Holidays.

2.0 Planning History

2.1 The site has a long history associated with minerals and waste, and has been in use for many years as an HWRC. The area surrounding the site features several disused sandstone/iron ore quarries. A map of 1873 shows the land use at the site as an undeveloped agricultural field and woodland. An 'old quarry' was marked as located on the opposite side of Faircrouch Lane, 20m to the East. On a map of 1897-98, the site was itself marked as an 'old quarry'. Between 1907 and 1957, the site was shown as woodland (not marked as an old quarry). Between 1971-75, the site was marked as a 'council yard' and an unnamed building was shown as being located on the site. Between 1994 and 2021, the site was marked on maps as a 'depot'. Planning permission (application WD/96/6002) was granted in 1996 for extension of the HWRC located at the site, which appears to have been in operation since at least 1995. Aerial photography between 2003 and 2018 shows the site as an HWRC, with numerous containers for materials and open space for manoeuvring vehicles clearly visible. The proposed development therefore represents continuity with the existing and historical site use of the site as a waste site, while the site also has an older association with the quarrying of minerals.

2.2 The site is bounded to the north by Wadhurst Business Park, to the east by Faircrouch Lane, to the south by a car park and agricultural field, and to the west by an agricultural field. Further to the south east lies Wadhurst station, and running from north west to south east, the London-Hastings railway line passes through a deep cutting. There were formerly railway sidings to the east and north east of the site.

2.3 The land around the site falls towards the north and the site has been cut into the

hillside. A bank separates the site from the agricultural fields to the south and west. Existing woodland screens the site around its northern, western and southern sides, with thicker existing woodland also located on the far side of Faircrouch Lane, to the east of the site. To the north, a large industrial unit is located just beyond the northern boundary of the site, within Wadhurst Industrial Park, with car parking beyond. The topography of the surrounding landscape features the patchwork of fields, dense woodland, sunken lanes and ponds, and hilly terrain, characteristic of the High Weald.

3.0 Planning Considerations

3.1 The Local Development Plan comprises:

- Wealden District Core Strategy Local Plan (February 2013);
- ESCC Waste and Minerals Local Plan (February 2013);
- ESCC Waste and Minerals Sites Plan (February 2017); and,
- National Planning Policy Framework (July 2021).

Need for CDEW recycling facilities

3.2 Policy WMP1 in the Local Waste Plan states that the LPA will take a positive approach to waste and minerals development that reflects the presumption in favour of sustainable development contained in the NPPF. Waste and minerals developments that accord with policies in the Local Waste Plan will be approved without delay, unless material considerations indicate otherwise. The proposed development does accord with both national and local policies, for the reasons further detailed below. There are no material considerations indicating otherwise, and the application should therefore be approved.

3.3 The achievement of sustainable development is a major objective of the planning system, and the reduction, reuse and recycling of CDEW is essential towards achieving sustainable development. The construction, demolition and excavation sector is the largest contributing sector to the total waste generation nationally² and is estimated to comprise 51% of all waste arisings in East Sussex and Brighton & Hove³. The proposed development supports strategic objective SO1 of the Local

2 Waste Management Plan for England (January 2022).

3 East Sussex Waste and Minerals Monitoring Report 2018/2019.

Waste Plan by providing additional and well-located CDEW recycling capacity to drive management of waste up the waste hierarchy. It also supports strategic objective SO2 of the Local Waste Plan, as increasing CDEW recycling capacity is a key factor in achieving the prudent and efficient use of minerals (in particular in view of the low level of supply of raw aggregates in East Sussex), and recognising waste as a resource in order to reduce local demands on primary raw materials.

- 3.4 The proposed development meets Policy WMP3b, because CDEW of this type cannot be managed in a process further up the waste hierarchy and this type of recycling is the option that delivers the best overall environmental outcome (the other being landfill). Likewise, the proposed development will contribute to meeting (or exceeding) the targets set out in the Local Waste Plan, and will not displace the management of waste managed by a process which is further up the waste hierarchy than that being proposed. Policy WMP5 states that provision will be made for a sustainable network of waste recycling, composting and other recovery facilities to at least meet the indicative waste management capacities set out in the Local Waste Plan, so as to ensure net self-sufficiency. The proposed development will contribute towards this policy being achieved. The quantity of CDEW to be managed in the plan area (East Sussex and Brighton & Hove) is estimated in the Local Waste Plan at 832,000 tonnes (minimum) to 924,000 tonnes (maximum) in 2020/21, and 811,000 tonnes (minimum) to 971,000 tonnes (maximum) in 2025/26⁴. However, the most recent monitoring report states that the recycled aggregates processing facilities in East Sussex and Brighton & Hove are estimated to provide capacity for approximately 632,000 tonnes per annum of CDEW waste as at 1 April 2019.⁵
- 3.5 For waste planning, flexibility is vital, given the need for waste management provision to respond to changes in the market (e.g. international markets for recycle and refuse derived fuels) and the proposed development will help provide this.
- 3.6 At the same time, the proposed development provides capacity in relation to growing need for the processing of construction materials in the area from a supply-side perspective, not least because of extensive house building. CDEW recycling is not just 'waste' in the traditional sense. East Sussex has historically had low levels of land-won aggregates production and has relied heavily on imports in recent years to meet construction demands. Secondary aggregate recycling is therefore important

4 Local Waste Plan, p51.

5 East Sussex Waste and Minerals Monitoring Report 2018/2019, p83.

and can assist with ensuring an adequate supply of aggregates. Likewise, metals such as aluminium, copper, zinc and lead are all valuable recyclable materials used in construction. The NPPF states at paragraph 210(b) that planning policies should take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously. The NPPF also states at paragraph 210(e) that planning policies should safeguard existing, planned and potential sites for the handling, processing and distribution of substitute, recycled and secondary aggregate material. The proposed development will therefore help promote the aims of central and local government as it will assist with recycling construction materials and making them part of the circular economy.

Safeguarding of existing waste sites

- 3.7 Policy WMP6 states that to ensure waste management capacity in the Plan Area is maintained and enhanced, waste management sites including existing waste management sites with permanent planning permission and sites allocated for waste uses in any extant development plan document will be safeguarded, unless it is demonstrated that alternative capacity is permitted and delivered elsewhere within the Plan Area, or unless it is demonstrated that the waste management provision is no longer needed to meet either local or strategic needs. Development proposals which would prevent or prejudice those sites for waste management uses will be resisted. In cases of planning applications for non-waste uses, the Authorities will not support these where it would result in the loss of or adversely impact upon an existing waste site.
- 3.8 The site has been in use as an HWRC since at least the mid-1990s. Although vacated when ESCC closed the HWRC, it did not become abandoned, but was temporarily unused during the marketing and sale process. The proposed use continues to utilise the site for waste recycling purposes, but for construction and demolition waste rather than household waste.
- 3.9 The proposed use would continue to safeguard the site as a waste recycling site and prevent redevelopment of the land for non-waste use. As the proposed use does not involve any alterations, the existing site is fully safeguarded for future waste needs. This is in line with Policy WMP6 regarding safeguarding of existing waste management facilities, and Policy SP6, which safeguards existing HWRCs.

- 3.10 The proposed development would also contribute towards Policy WMP 7b which provides that land already in waste management uses are a type of site that could be developed for provision of waste sites, as well as previously developed land and land in general industrial use.
- 3.11 The Waste Local Plan recognises (paragraph 3.18) that the difficulties associated with establishing new waste facilities also mean it is important to protect land to facilitate delivery of facilities on new sites. This is necessary because the types of sites that are required for modern built waste treatment facilities are increasingly under pressure from other forms of (higher value) development. There is direct competition for sites on industrial land from other employment uses, and also indirect pressures from encroachment of more sensitive land uses such as residential.
- 3.12 The Local Waste Plan also sets out (paragraph 3.20) that land currently used for waste management will usually be safeguarded against development for non-waste uses. In cases of planning applications for non-waste uses, the Authorities will not support these where it would result in the loss of or adversely impact upon an existing waste site, or where the loss would hinder implementation of the Plan and potential development of new facilities. The plan notes (paragraph 3.21) that protection may in particular be needed where land currently used for waste management is under pressure for development for non-waste uses or where existing waste facilities are under pressure from potential future sensitive developments nearby. There may be exceptions (paragraph 3.22) where the capacity provided by an existing waste site is no longer needed to meet identified needs, and consequently redevelopment for alternative uses may be considered. In this case any planning permission application would have to demonstrate that the loss of the waste management use will not detract from the achievement of the Local Waste Plan's objectives.
- 3.13 If this site was lost to an alternative development use, it would be very difficult or impossible to re-establish waste use on the site and a safeguarded site would be lost.

Design of the proposed development

- 3.14 Policy WMP22 enables expansions of capacity or alterations to operations within existing management facilities, and encourages alterations within facilities where it will support more sustainable waste management and movement of waste up the

waste hierarchy. The proposed development in effect represents an alteration to the existing facility to enable a wider scope of operations. Proposals for the same operational capacity within the site boundary of existing waste management facilities will be supported in principle where it is demonstrated that the development would contribute towards meeting the objectives of the Local Waste Plan. Development linked to existing facilities is also supported by national policy. Local policy encourages alterations within facilities where it will support more sustainable waste management and movement of waste up the waste hierarchy as set out by other policies and objectives of the Local Waste Plan.

- 3.15 Policy WMP 2a sets out that all buildings associated with waste and minerals developments should be of a scale, form and character appropriate to its location and incorporate innovative design, where appropriate, and allow sufficient space for the effective sorting, recycling, recovery and storage of waste. In rural areas, buildings should reflect the nearby built form or reuse redundant farm buildings, design should take account of local landscape character and distinctiveness, site locations should allow sufficient space for quality landscape treatment and site design should minimise views to operational areas, particularly external storage and parking and other elements that present a more 'industrial' appearance.
- 3.16 The proposed development does not involve any further buildings beyond the hardstanding and fencing on existing site, except for two welfare offices which are of a temporary nature and push walls constructed from concrete blocks. The site is of an ideal size for a small scale CDEW recycling facility of this nature, and affords sufficient space for all the necessary operations. The proposal does not entail any changes to landscaping. The welfare offices, materials and machinery at the site, although not reflecting local built form as such, will be effectively screened by the existing woodland and Wadhurst Business Park to the north, and will have no visual impact over and above the existing nature of the site and the containers associated with the former HWRC operation. Overall, the proposal is appropriate and proportionate to the operations being carried out, and is means of doing so the entails the most minimal visual impact.
- 3.17 The likely screener and crushing operation that may take place is an optional future component. It is suggested a suitably worded condition can be agreed to safeguard these additions if they are later required. In the first instance, much like the current use, the site will simply sort and store the waste. Actual processing will be limited and probably carried out by authorised waste handlers. Weighing in favour of this

conditioned approach is the simple fact the proposal sits with a natural acoustic bund surrounding it and the likelihood of noise impact greater than the lawful use is minimal.

Sustainable location

- 3.18 The proposed development supports strategic objective SO5, which requires management of waste and minerals at an appropriate scale, taking account of the distribution of waste sources and the limitations on the availability of suitable land, as close to the sources as practicable in order to encourage communities to take more responsibility for the waste they create and to minimise the transport of waste and minerals whilst still moving up the waste hierarchy.
- 3.19 The site represents a sustainable location for a construction, demolition and excavation ('CDEW') recycling facility, because of its former use as a HWRC, requiring minimal alteration. It will provide additional CDW recycling capacity in the area, and assist with diverting CDW from landfill. It is of an appropriate scale for the location. Utilising this existing location takes into account the lack of availability of other waste locations in the High Weald, given its rural character and AONB status.
- 3.20 The National Planning Policy for Waste (2014) states that, in identifying appropriate locations for waste management facilities in their Local Plans, authorities should 'give priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.' The proposed development is in line with this overall policy (although the proposal is not one identified by the LPA).
- 3.21 The proposed use does not involve any alteration to the current site, and therefore avoids potential environmental risks associated with the removal of the concrete hardstanding and potentially contaminated backfill sitting behind it.

Character and appearance

- 3.22 The site sits within the High Weald AONB. Policy WMP 7a states that small-scale waste facilities should not be precluded from the High Weald Area of Outstanding Natural Beauty where the development is for local needs and where it would not compromise the objectives of the designation.

3.23 The proposed development will not harm the character and appearance of the area or the objectives of AONB designation for a number of reasons. Firstly, it does not propose any permanent alteration to the site. The existing hardstanding will remain, together with the boundary fences. The proposed welfare offices are temporary and removable in nature. The machinery required at the site will be mobile. Secondly, the proposed development will have no additional visual impact beyond that of the existing site. The site is well screened on all sides (except as viewed from Faircrouch Lane to the east) by existing woodland. The topography of the site provides further cover, with the site set back into the hill, and banks on its southern and western edges. Thirdly, the immediate area has long been characterised by light industrial use, including extensive historic quarrying, a historic timber yard, railway workings, and currently, Wadhurst Business Park. The proposed development is consistent with this character and will have no additional impact on appearance over and above the existing site.

Other matters

3.24 For similar reasons, the proposed development will not affect residential amenity. The machinery at the site will be limited. Policy WMP 25 is met.

4. Summary

4.1 The Site is a lawful protected waste facility for the processing of household waste. The proposed use, is for aggregates recycling and metal recycling site, including the processing, storage and transfer of waste, and the siting of two welfare offices. This alternative form of waste facility remains policy compliant.

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