

PLANNING STATEMENT

**Sustainable Leachate Treatment System
Robertsbridge Works**

Applicant: British Gypsum Ltd

SLR Ref: 404.00195.00035
Version No: Draft V0
May 2021



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EQ5005-E-37-01 Solar Panel Elevation

EQ5005-E-40-04 Inverter GRP Elevation

SR-3 Designations Plan

Kiosks, Booths & Cabins Product Catalogue

1.0 Introduction

British Gypsum Limited is applying to East Sussex County Council (ESCC) for planning permission to install a sustainable leachate treatment system in connection with its closed landfill site adjacent to Robertsbridge Works. The new system would minimise the need for the current, unsustainable method of tankering leachate offsite for treatment, and would be supported by integrated renewable energy generation in the form of solar PV.

1.1 Purpose of the proposed development

The proposed leachate treatment system is required to minimise the need for and / or replace the current method of leachate management at the closed landfill site which requires leachate to be pumped into a road tanker and taken offsite to a suitable treatment works. The new system would make use of a biological system of treatment that would clean the leachate on site through use of biological media, including reed bed system for final cleansing, prior to discharge.

Whilst the system is designed to be a low energy user, there would be a small energy requirement to pump leachate around the system and it is proposed that electricity would be provided by means of solar photovoltaic (PV) panels that would form an integral part of the proposed development.

The resulting clean water from the proposed onsite treatment would contribute to water demand within the Works and would also have a positive benefit on flows in the River Line.

1.2 Content of this report

This Planning Statement provides information regarding the site (section 2.0), planning history (3.0), the proposed development (section 4.0), the planning policy context for such developments and how the proposed development conforms with national and local policy (section 5.0), a Design and Access Statement (section 6.0) and a commentary on environmental issues including a summary of detailed studies on key environmental issues (section 7.0).

Conclusions are presented in section 8.0.

1.3 The Applicant

British Gypsum is the trading name of Saint Gobain Construction Products United Kingdom Limited (the Applicant). In the UK, British Gypsum employs over 1,100 people. British Gypsum is a major operator in the UK construction industry and the country's leading manufacturer and supplier of gypsum-based plastering and drylining solutions. With its headquarters at East Leake in Leicestershire, the company currently has five manufacturing plants in the UK.

Since circa 2006, British Gypsum has been a wholly owned subsidiary of Saint Gobain. Saint Gobain, who is based in France, has operations in 64 countries and employs 190,000 people, and is the world's largest plaster and plasterboard manufacturer.

British Gypsum's Robertsbridge Works and the associated Brightling Mine employ over 100 people and is one of the largest employers in the local area.

1.4 SLR Consulting Ltd

SLR is a multidisciplinary international environmental consultancy based in the UK and delivering advice and support on a wide range of strategic and project-specific issues to a diverse and growing base of business, regulatory and government clients.

Further information on SLR can be found on its corporate website at www.slrconsulting.com.

The application has been prepared by SLR with support on ecological matters from Golder associates (UK) Limited.

1.5 Pre-application consultation

The Applicant has requested and obtained a screening opinion from ESCC as to the need for Environmental Impact Assessment (EIA) for this development. The Council's decision, received on 23 April 2021, was that EIA is not required.

1.6 Submitted documents

The planning application is supported by a completed planning application form and certificates, this Planning Statement, and the following technical documents and drawings:

- Application Drawings
 - LTS-1 - Site Location and Ownership Boundary
 - LTS-2 - Application Boundary
 - LTS-3 - Proposed Site Layout
 - LTS-4 – Typical Sections Leachate Treatment
 - EQ5005-E-37-01 Solar Panel Elevation
 - EQ5005-E-40-04 Inverter GRP Elevation
 - SR-3 Designations Plan
- Kiosks, Booths & Cabins Product Catalogue
- Landscape and Visual Appraisal
- Flood Risk Assessment.

2.0 Site and surroundings

2.1 Site location

Robertsbridge Works is located near the village of Mountfield, 8 kilometres to the north of the settlement of Battle and approximately 1.8km to the west of the A2100. The site location is shown on **Drawing LTS-1 - Site Location and Ownership Boundary**. The postcode for Robertsbridge Works is TN33 9PU.

The site is accessed from the A2100 London Road via a 1.5km private access road.

2.2 Application site

The site of the proposed development is located entirely within the existing Robertsbridge Works complex. The majority of the application site is located within the boundary of a closed landfill site, south of both the Works and the main private access road into the Works complex. The site includes a section of the route of the River Line which runs partly in culvert along the northern edge of the site. The red line boundary for the planning application is shown on **Drawing LTS-2 - Application Boundary**.

The site is centred on grid reference TQ 72834 19731 and comprises 4.1 hectares (ha).

The site extends slightly beyond the landfill site to the east, where it encompasses an existing access road ('the eastern access road'). The access road is bounded to the east by the River Line which emerges from culvert at the top (northern end) of the road and flows south along the eastern side of the road. To the west, an area of vegetation including occasional trees lies between the eastern access road and the landfill site. Part of this area is currently occupied by temporary mobile containers that have been used for trialling the leachate treatment project.

There are no other trees within the site. Scrub vegetation is regularly trimmed back from the landfill area perimeter as part of the landfill Permit requirements. The landfill site itself comprises short, mown / grazed grassland comprising mainly ryegrass species.

2.3 Surroundings

The whole of the Robertsbridge Works complex is located within a wide valley that is heavily wooded. The landscape is typical of the Weald which is characterised by rolling hills and mixed (mainly deciduous) woodland, some of which such as Crowhurst Wood to the south and east of the application site are identified as Ancient Woodland on the Ancient Woodland Inventory.

2.4 Statutory designations

The site is located within the High Weald Area of Outstanding Natural Beauty (AONB). There are no other designated areas within or adjacent to the application site.

Designations and features of interest within the surrounding area are shown on Drawing **SR-3 Designations Plan**.

The Environment Agency flood maps show that the site is located in Flood Zone 1, i.e. low risk of flooding.

3.0 Planning history and permitting

Robertsbridge Works was established to manufacture plaster and plasterboard using gypsum from the adjoining Mountfield Mine. Gypsum mining has taken place at Mountfield Mine since the late nineteenth century. As reserves began to become depleted, a second mine at Brightling was opened in 1963 and the extracted material from this mine has, since 1986, been transported to the Robertsbridge Works for processing via an overland conveyor, a distance of approximately 5km. The factory building for Robertsbridge Works operates under a planning permission that dates back to 8th June 1964 (planning permission ref A/64/350).

There are two landfills that formerly served the Works, known as Old Tip and New Tip, both of which were used primarily for the disposal of plasterboard waste. Both landfills are closed, although they continue to be monitored and managed in accordance with Environmental Permits, and regulated by the Environment Agency. The application site is located within the eastern section of Old Tip.

There is no record of any specific planning permissions for the former landfill sites on the Council's website. It is possible that the permissions may pre-date the current system of records.

The proposed leachate treatment facility is the subject of a current application to the Environment Agency submitted in March 2021 to vary the Environmental Permit for Old Tip. The variation, once approved, will allow the Environment Agency to regulate the operation of the proposed facility in respect of any discharges to air, land and water.

4.0 Description of proposed development

4.1 Need for the development

The closed landfill sites generate approximately 73,000m³ of leachate per annum. The leachate comprises contaminated water which must be treated before it can be discharged to surface water.

There is currently no treatment facility within the Robertsbridge Works complex for the leachate, which must be collected and tankered offsite for treatment elsewhere. Whilst leachate volumes vary depending on seasonal weather conditions, on average there are between four to five HGV tanker movements required every day.

The current destination for leachate from the closed landfills is Aylesford, Kent, a round trip of 122 km (76 miles). It is estimated that the proposed development would result in a saving of 182,400 km (114,000 road miles) a year, saving 150 tonnes of carbon annually.

Whilst the landfill sites are both closed, it is expected that leachate will continue to be generated for years to come, and the current method of treatment is considered unsustainable. It is therefore proposed to install onsite treatment in the form of a passive leachate treatment system, constructed on the surface of the Old Tip, to treat leachate generated by both The Old Tip and New Tip landfills.

The proposed leachate treatment system would provide a 'filtration' and 'polishing' system that would clean the water to a standard such that it is capable of being discharged (under an Environmental Permit) to the adjacent River Line. Additionally, a process-controlled amount of the outflow would be diverted and used as process water within the Works, reducing the requirement for process water to be drawn from the Darwell reservoir. The proposed system relies on biological processes to provide a robust and environmentally sound treatment technology. It is envisaged that the proposed development would minimise or completely replace the need for leachate to be removed by tanker.

Due to the passive design of the process, the energy requirement for the proposed facility is confined to a requirement for pumps to circulate leachate around the system. It is proposed that renewable energy requirement would be generated onsite using solar PV panels as an integral part of the scheme.

4.2 Scheme Description

4.3 Operation

The scheme comprises passive treatment technology, with limited mechanical intervention, using an organic media process to provide the initial biological treatment of the leachate, followed by filtration and aerobic polishing in a reed bed to aerate the treated water prior to discharge. The proposed layout is shown on **Drawing LTS3 Proposed Site Layout**.

The initial biological treatment would comprise a series of four waterproof-lined holding 'tanks' formed of a series of engineered earth bunds located in the south west section of the site. Typical sections through the earth bunds, which would be up to 3 metres in height, are shown on **Drawing LTS-4 – Typical Sections Leachate Treatment**. The external surface of the earth bunds would be seeded with a suitable grass seed mix to blend visually with the grassed surface of the landfill. The tanks would be filled with solid organic media that use

sulphate-reducing bacteria to consume sulphate in the leachate and produce sulphide. The organic media would comprise woodchip, limestone, straw and biochar in varying proportions.

Leachate, destined for treatment in the organic media tanks, would be pumped from the existing underground holding tank on site into the first of the four proposed organic media tanks, following which it would then flow through pipework at a controlled rate under gravity through the three remaining tanks. Treatment tanks will at all times remain filled with the organic media.

First stage treated leachate emerging from the four organic media tanks would be passed through a sand filter bed to remove particulates prior to flowing under gravity to a reed bed, comprising a geomembrane-lined shallow pond containing soil and locally-harvested vegetation. The purpose of this process feature is to re-aerate the anoxic treated leachate from the organic media treatment. After passing through the reed bed, the final treated leachate would emerge as clean water to be discharged to the River Line in accordance with the requirements of the Environmental Permit.

The only mechanical element of the system would be the pumps to feed the leachate to the organic media tanks; from that point forward, the flow through the system relies on gravity. The system would be fitted with monitoring control measures, such as overtopping controls, in accordance with the Environmental Permit.

The energy demand of the system would be powered by a private wire connection to an integral solar PV system. The solar panels would be set out in arrays facing south along the top of the landfill. The solar panels would be angled at approximately 30 degrees so as to maximise the capture of solar energy, with the top edge of the panels being up to a maximum of 2.6m above ground (see **Drawing EQ5005-E-37-01 Solar Panel Elevation**). The solar panels would be mounted on metal frames and anchored by ballast plates connected to shallow concrete plinths to avoid penetrating the landfill. The panels would be dark grey/blue in colour and have an anti-reflective coating to minimise glare and glint and ensure maximum absorption of the available sunlight. The rows would be placed approximately 5-7m apart.

Inverter units (two in total) as shown in **Drawing EQ5005-E-40-04 Inverter GRP Elevation** would be located adjacent to the arrays as shown in **Drawing LTS3 Proposed Site Layout**. The system would also require a switch gear kiosk as part of the management and control system. Any surplus power generated would be diverted for reuse elsewhere within the Works complex or exported to the grid. Indicative details of the proposed switchhouse are provided in the Kiosks, Booths & Cabins Product Catalogue submitted with the application, but would essentially comprise a standard GRP building / container unit. The proposed pumphouse would be installed in a similar unit.

Access to the site would be provided from a new site entrance located along the north west boundary of the site leading from the main private access road within the Works complex. The site entrance would be hard-surfaced for a distance of approximately 50 m from the main access road.

Access tracks within the site would be required for construction purposes and, following commissioning of the facility, would continue to be used for maintenance and monitoring purposes. Internal access tracks would be surfaced with hardcore (secondary aggregate) arising from the adjacent mining operations as available. In order to manage surface water drainage effectively, the entrance area would be surfaced in porous concrete or tarmac, whilst the use of hardcore on the internal access tracks would ensure they would be free draining.

The proposed development is located primarily within the footprint of the landfill site, with the exception of the pumping and control equipment (pumphouse, switchhouse and underground feed tank) which would be located along the eastern access road in the area currently occupied by the pilot scheme containers, and the discharge pipes that would extend eastwards from the reed beds to connect with the River Line. A secondary stockproof fence would be erected around the organic media tanks and reed bed to provide additional security.

The dimensions of the proposed development together with a summary of the proposed materials are set out in **Table 4.1**.

Table 4.1: Development parameters

Item	Dimensions	Materials
Organic media tanks	Footprint area 8,796 m ² Height up to 3m	Earth bund construction using recovered soils seeded with suitable grass mix and containing organic media (woodchip, limestone, straw and biochar)
Sand filter unit	Footprint area – up to (scale from drawing plot) 500 m ² Height – up to 2m	Pre-formed tank or tanks (GRP, plastic or concrete) Colour RAL 6000 (Green) or BS 14-C- 39 green similar
Reed bed	Footprint - area 6,624 m ²	Soils forming shallow terraces retaining beds of locally-sourced <i>Phragmites</i> reeds
Solar Arrays	Solar PV panels – area 6,247 m ² up to 2.6m high	Dark, non-reflective photovoltaic glass fixed on metal frames
Inverter unit	Height – 2.0m Width – 2.0m Depth – 2.0 m	GRP containerised unit in colour, matt finish smooth green BS 14-C-39
Switch house	Height - 2.4m Length - 6m Width - 2.4m	GRP containerised unit in colour, matt finish smooth green BS 14-C-39 https://www.industrialgrp.co.uk/colours-and-finishes/ Model HAST6024 or similar
Pumphouse	Height - 2.4m Length - 6m Width - 2.4m	GRP containerised unit in colour, matt finish smooth green BS 14-C-39 https://www.industrialgrp.co.uk/colours-and-finishes/ Model HAST6024 or similar
Site access tracks	Area – 2,800 m ² Width - 3m	Locally-won hardcore (secondary aggregate if available)
Site entrance	Area – 682 m ²	Concrete or tarmacadam (porous)

It should be noted that all structures listed above would be constructed above ground to avoid impact on the integrity of the landfill.

Lighting

There is no requirement for lighting as part of the proposed development, other than for motion sensor lighting at the entrance to the pumphouse and switchhouse for health and safety purposes in case emergency access is needed to these units during the hours of darkness. This is expected to be only an occasional requirement and would not form part of standard operational requirements.

4.4 Construction

Construction of the proposed development would commence as soon as necessary consents are in place and would seek to make use of drier weather conditions in the summer months. Construction is expected to take approximately six months in total, although activities would not be continuous during this period. Construction management measures would be put in place to ensure that all site activities and deliveries are managed in accordance with good practice.

The first phase of construction comprises formation of the organic media tanks and reed beds. The proposed sequence of Phase 1 operations would be as follows:

- a new site entrance would be constructed together with internal hardcore access tracks which would be extended around the site for use by construction plant and delivery vehicles;
- topsoils from the landfill site would be stripped and placed to one side for use in landscaping of the earth bunds and reed beds;
- suitable engineering soils would be imported for use in construction of the organic media tanks and reed bed and placed directly onto the required location prior to forming into engineered retaining bunds;
- stored soils would be replaced over the external surfaces of the imported soils to provide a growing medium for a suitable wildflower grass seed mix;
- the tanks would be filled with carefully selected organic media, locally sourced where possible, and the reed bed planted with locally-sourced reeds;
- the sand filter bed would be installed using a pre-formed shallow tank or tanks delivered to site and filled with sand on site.

The solar PV arrays would be installed as a second phase of construction. As the solar panels would be located on a landfill site, it will not be possible to use standard driven piles and the frameworks for the arrays would be secured by ballast plate connected to shallow concrete plinths.

The pumping and electrical control equipment would be housed in GRP containerised units that would be delivered to site along the existing eastern access road and placed on concrete bases.

Hours of working

The proposed construction hours of working are as follows:

- Monday – Saturday 0700 – 1900 hours; and
- there would be no working on Sundays or bank holidays.

Construction traffic movements

All construction materials that require to be imported to the site would use the existing Robertsbridge Works private access road from the A2100 London Road.

The volume of imported soils required for the first phase of construction (the organic media tanks and reed bed) amounts to approximately 5,000 m³ and would be brought to site over a period of several weeks, depending on availability of suitable material from soil generating sources. Deliveries would be limited to a maximum of 40 truckloads per day. In order to ensure that the proposed construction works do not increase total daily traffic movements to and from the Works complex, the Applicant would be willing to commit to an arrangement whereby vehicles delivering soils to site would not coincide with deliveries to any other restoration works¹ permitted within the Robertsbridge complex.

¹ Currently there is ongoing periodic restoration work being undertaken in connection with a 2011 planning permission for the former mine site.

During the second phase of construction, which would commence following completion of Phase 1, there would be a short period of activity associated with construction of the solar panels and ancillary equipment. This is estimated to take approximately three weeks in total and would require approximately six HGV deliveries in total. The sequential nature of the installation activity ensures that the demand for materials and components is relatively evenly spread throughout the construction phase, i.e. averaging less than one HGV delivery per day.

As woodchip forms the majority of the organic media, it is proposed to use suitable material generated from the British Gypsum woodland management activities adjacent to the proposed development as appropriate, ensuring a sustainable woodchip source and limiting unnecessary vehicle movements.

It is not envisaged that there would be any requirement for equipment to be brought to site as abnormal loads.

Due to the length of the internal access road between the site and the public highway, there is no risk of mud and dust being tracked onto the public road. The Applicant would make use of the installed wheelwash unit at the Works exit and undertake road sweeping of the internal road as necessary to ensure that it is kept clean, in accordance with existing practice.

5.0 Design and Access Statement (DAS)

A DAS is required with planning applications for major development. Certain exceptions apply, including applications for waste development, which do not need to be accompanied by a DAS. In this instance whilst the primary purpose of the application is waste management, there is an additional element of development for the solar PV which it is considered may carry a requirement for a DAS. This section therefore provides a DAS in respect of the solar PV and associated infrastructure.

5.1 Site selection

The proposed solar PV is directly related to the proposed sustainable leachate treatment system and its co-location with the leachate system was selected as being most suitable for the following reasons:

- the location immediately adjoining the leachate treatment infrastructure allows minimum disruption due to cable installation and minimises system losses from the energy generation;
- the closed landfill site provides an area that is open land with minimal shading and good levels of solar irradiation;
- using land adjacent to the leachate treatment system groups together the required infrastructure and concentrates development within a single location that is visually contained; and
- there is opportunity for shared infrastructure including site access and drainage.

5.2 Use

The site comprises land within the boundary of a closed landfill site, south of the Works and adjacent land to the east, where it encompasses an existing access road (the eastern access road). Full details are provided in section 2.2 of this Planning Statement.

The landfill site itself comprises short, mown / grazed grassland comprising mainly ryegrass species which has little ecological value.

5.3 Amount and scale

The application site area comprises 4.1 ha of which the solar panel arrays will occupy approximately 15%. Details of the various elements of the proposed solar development (some of which, such as access tracks) are shared with the leachate treatment system, are set out in **Table 5.1** below:

Table 5.1: Amount and scale of proposed solar infrastructure

Item	Dimensions
Solar Arrays	Solar PV panels – area 6,247 m ² up to 2.6m high
Inverter unit	Height - 1.5m Width - 1m Depth - 0.7m
Switch house	Height - 2.4m Length - 6m Width - 2.4m
Pumphouse	Height - 2.4m Length - 6m Width - 2.4m
Site access tracks	Area – 2,800 m ² Width - 3m
Site entrance	Area – 682 m ²

5.4 Layout and appearance

The solar panels would be angled at approximately 30 degrees so as to maximise the capture of solar energy, facing south, with the top edge of the panels being up to a maximum of 2.6m above ground (see **Drawing EQ5005-E-37-01 Solar Panel Elevation**). The solar panels would be mounted on metal frames and anchored by ballast plates connected to shallow concrete plinths. The panels would be dark grey/ blue in colour and have an anti-reflective coating to minimise glare and glint and ensure maximum absorption of the available sunlight. The rows would be placed approximately 5-7m apart. Inverter units (2 in total) as shown in **Drawing EQ5005-E-40-04 Inverter GRP Elevation** would be located adjacent to the arrays as shown in Drawing LTS3 Proposed Site Layout.

The electricity switchhouse would be located adjacent to the pumphouse along the eastern access road, for ease of access for monitoring and maintenance. Both the switchhouse and pumphouse would be housed in GRP cabins, in matt finish, colour smooth green BS 14-C-39. Indicative details are provided in the Product Brochure that accompanies the planning application.

The site would be secured with stock-proof fencing up to 1.8m high. CCTV cameras would be provided in key locations such as the around the organic media treatment area and the switchhouse and pumphouse cabins, for security purposes.

5.5 Access

Access to the site would be obtained from the private internal Robertsbridge Works access road via a new gated entrance that would be constructed to allow for delivery vehicles during construction, and thereafter for monitoring and maintenance visits.

The entrance would be surfaced for a distance of approximately 50m with porous asphalt or concrete. Within the site there would be access tracks providing access to all key items of plant and equipment that would be surfaced with hardcore to allow for drainage.

6.0 Planning Policy Review

The Planning and Compulsory Purchase Act 2004 confers a presumption in favour of development proposals which accord with the Development Plan, unless material considerations indicate otherwise. Sub Section 5 of Section 38 of the 2004 Act also states that, “*if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be)*”.

This principle has been developed and clarified by subsequent case law, which has confirmed that a particular proposal does not need to accord with each and every policy in a development plan; the key issue is that it accords with the overall thrust of Development Plan policies taken as a whole. Accordingly, policy and plans play an important role in determining any planning application.

6.1 National Policy and Guidance

6.1.1 National Planning Policy Framework

At the national level, planning policy is set out in the National Planning Policy Framework (NPPF) and forms a material consideration in the determination of the planning application.

The NPPF confirms that there are three dimensions to sustainable development: economic, social and environmental. The economic role includes the provision of infrastructure; the social role refers to accessible local services that reflect the community’s needs and the environmental role looks to contribute to protecting and enhancing our natural, built and historic environment. The NPPF is clear that these roles should not be considered in isolation and to achieve sustainable development economic, social and environmental gains should be sought jointly through the planning system.

The proposed leachate treatment system is in line with the economic and environmental dimension of sustainable development. The development would provide essential support to the ongoing management of historical waste disposal and a reduction in environmental impact.

Paragraph 148 of the NPPF makes it clear that the planning system “*should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure*”.

This Planning Statement demonstrates that the impacts of the proposed development are minor in nature and are, or can be made, acceptable.

6.2 Development Plan

The adopted East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (WMP) sets out the strategic policy decisions for waste and minerals in the Plan area. The Draft Revised Policies, published March 2020, do not propose any changes to the relevant policies. The key policies listed below are relevant to the proposed development; the conformity of the development with the relevant policies is considered later in this section in **Table 6-1**.

Policy WMP 1 Presumption in Favour of Sustainable Development states that the Waste Planning Authority “will take a positive approach to waste and minerals development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework”.

Policy WMP 18 Transport – Road, Rail and Water states that “Waste and minerals development should seek to minimise transport movements and prefer non-road modes of transport subject to the practicalities pertaining to individual cases”.

Policy WMP 22 Increased Operational Capacity within the Site Boundary of Existing Waste Facilities states that “Proposals for increased operational capacity within the site boundary of existing waste management facilities will be supported in principle where it is demonstrated that:

- a. the development is required to meet current environmental standards including improving energy efficiency; or
- b. the development is required to improve the operational efficiency of the facility, including the efficiency with which the facility uses or generates energy; and
- c. the development would contribute towards meeting the Objectives of the Plan”.

Policy WMP 23b Operation of Sites states that

“Proposals for waste management, mineral extraction / processing, and associated activities should be accompanied by a working programme for the proposed operation which includes arrangements as applicable for the scale and nature of the operation, for:

- a. site preparation;
- b. phasing of workings/construction;
- c. plant and machinery to be used;
- d. location of site roads, material storage areas, buildings and provision of screening of working areas and cleaning of vehicles;
- e. protection of existing features of cultural and landscape significance;
- f. a mitigation/compensation scheme for any other environmental impacts and enhancements; and
- g. a landscaping scheme for the operational life of the site to include a means of screening the proposed development, including planting, with native species where appropriate, to maximise opportunities for habitat creation and supported by a management plan”.

Policy WMP 24a Climate Change states that measures should be taken to minimise greenhouse gas emissions including

“locating and designing the facility, and designing transport related to the development, in ways that seek to minimise greenhouse gas emissions;

- b. incorporating carbon off-setting measures;
- c. Use of renewable, decentralised, or low carbon energy sources to power the facility;
- d. incorporating measures to minimise flood risk associated with the development; and
- e. measures to minimise waste materials generated from operational processes”.

Policy WMP 24b Resource and Energy Use states that

“Proposals should incorporate carbon offset measures and should be designed in such a way as to minimise greenhouse gas emissions. Applicants should demonstrate that during operation of any facility:

- a. energy (including heat) will be obtained from decentralised renewable or low carbon sources where possible (although on-site generation of energy should not prejudice the movement of waste up the waste hierarchy); and
- b. measures will be taken to minimise waste from operational processes and maximise energy efficiency”.

Policy WMP 25 General Amenity states that

“All proposals should ensure:

- a. there is no unacceptable effect on the standard of amenity appropriate to the established, permitted or allocated land uses of the local and host communities likely to be affected by the development including transport links;
- b. there is no significant adverse impact on air quality or the local acoustic environment;
- c. adequate means of controlling noise, dust, litter, odours and other emissions, including those arising from traffic generated by the development, are secured;
- d. there is no unacceptable effect on the recreational or tourist use of an area, or the use of existing public access or rights of way.

Where proposals require an Environmental Impact Assessment, applicants should consider the potential impacts on human health”.

Policy WMP 27 Environment and Environmental Enhancement states

“a) To conserve and enhance the local character and environment of the Plan Area, permission will not be granted where the development would have a significant adverse impact on the following sites:

- South Downs National Park (see Policy WMP 2);
- High Weald AONB;
- Listed Buildings;
- Scheduled Monuments;
- Conservation areas;
- Registered Parks and Gardens;
- Registered Battlefields;
- Designated wreck sites;
- Significant Heritage Assets;
- High quality agricultural land;
- other sites recognised for their cultural heritage and historic significance.

These assets should be protected and where appropriate, enhanced.

b) Environmental enhancement - biodiversity and habitat creation

To conserve and enhance the local natural environment, the Authorities will maximise opportunities for increasing biodiversity and habitat creation. Permission will not be granted where the development would have a significant adverse impact on sites of national and local importance for nature conservation including:

- Sites of Special Scientific Interest;
- Local sites, identified for their biodiversity interest, including Sites of Nature Conservation Importance and Local Nature Reserves;

- Areas of significance for geodiversity and geomorphology, including local sites and Regionally Important Geological and Geomorphological Sites;
- Ancient woodlands;
- Land managed under an agri-environment agreement.

C) International Designations

These sites and protected species have statutory protection. Any development with a negative assessment of the implications of the proposal would need to demonstrate imperative reasons of overriding public interest”.

Policy WMP 28a Flood Risk relates to management of surface water including

“a. adequately provides for the implications of flood risk in that it would not increase the risk of flooding on the site or elsewhere and where possible reduce the risk of flooding overall;

b. is not detrimental to the integrity of sea, tide or fluvial flood defences or river channels;

d. has no significant adverse impact on the nature conservation and amenity value of rivers, wetlands or the marine environment; and

e. has appropriate measures in place to reduce surface water run-off, including the provision of sustainable drainage systems (SUDS)”.

Table 6-1 sets out how the development of the proposed development would comply with the relevant policies.

Table 6-1 WMP Policy Review

Policy Number and Text	How proposal accords with policy
Policy WMP 1 Presumption in Favour of Sustainable Development	The proposed leachate treatment system presents a more sustainable option for treatment of the ongoing leachate generated by the closed landfill site through the use of passive biological technology that obviates the use of offsite treatment. It is expected that the proposed development would remove the need for five tanker journeys every day, resulting in traffic and carbon benefits and providing a positive contribution to water resource management. The integral solar PV would ensure that energy use is generated by renewable means.
Policy WMP 18 Transport – Road, Rail and Water	The proposed development would obviate the current need for long term tankering of leachate to offsite treatment facilities. The closest suitable facility is in north Kent, resulting in over 180,000 km HGV road miles a year that would no longer be required when the proposed development is operational.
Policy WMP 22 Increased Operational Capacity within the Site Boundary of Existing Waste Facilities	The proposed development optimises the existing landfill footprint to provide low impact, passive treatment and renewable energy generation to manage ongoing leachate generation.
Policy WMP 23b Operation of Sites	Information relating to the working programme for the proposed operation applicable for the scale and nature of the operation is provided in Section 4.0: Description of proposed development . Mitigation measures, including landscaping

	proposals, are provided in the supporting documentation and summarised in section 7.0 .
Policy WMP 24a Climate Change	The proposed development would remove the need for five tanker journeys every working day, resulting in an estimated saving of 150 tonnes of carbon every year. The integral solar PV would ensure that energy use is generated by renewable means.
Policy WMP 24b Resource and Energy Use	The proposed development has taken the opportunity to firstly, design a passive treatment system with low energy demand, and secondly to incorporate integral renewable energy generation.
Policy WMP 25 General Amenity	<p>Section 7.0 considers amenity issues, including odour, noise, and traffic.</p> <p>The amenity impacts of transport would be improved due to the removal of the need for offsite treatment.</p> <p>The proposed development would have no direct impact on recreational users of Public Rights of Way and local roads. The visual impact on recreational users of local Public Rights of Way and local roads is considered within the Landscape and Visual Appraisal that accompanies the planning application, and further details are provided in section 7.0.</p> <p>It is considered that the location and design of the proposed development, together with the choice of materials and colours, are such that there would be no significant impact on recreational users.</p> <p>There are not considered to be any implications for human health. The proposed facility would be regulated by the Environment Agency under an Environmental Permit.</p>
Policy WMP 27 Environment and Environmental Enhancement	<p>The proposed development has been considered with regard to impact on the environment, and findings are presented in section 7.0. It is concluded that there would be no significant adverse impacts on the environment as a result of the changes, including no significant visual impacts on the AONB.</p> <p>The proposed development incorporates a reed bed system that would replace the current low biodiversity value grassland on the restored and so enhance biodiversity.</p> <p>The proposed development would not affect any statutory or local designations, including ancient woodland.</p>
Policy WMP 28a Flood Risk	The proposed development is located within Flood Zone 1 which is considered unlikely to be at risk of flooding. A Flood Risk Assessment (FRA) has been undertaken and accompanies the planning application. The FRA concludes that there is no significant risk of flooding at the site and Sustainable Drainage measures are proposed to accommodate up to and including the 1% AEP with a 20% uplift for climate change. Further details are provided in section 7.0 .

6.3 Policy Summary

The development is considered to be in accordance with national and local policy. The proposed development would contribute to the sustainable operation of Robertsbridge Works and would have no significant adverse impacts on the local or wider environment. Impacts on transportation, carbon footprint and water resources would be beneficial due to the removal of the need for offsite treatment, as would enhancement of biodiversity through establishment of the reed bed.

7.0 Environmental Issues

7.1 Overview

The key environmental issue associated with the proposed development is considered to be landscape and visual impact due to the location of the site within the High Weald AONB. A landscape and visual appraisal has therefore been undertaken to give detailed consideration to this issue, and is provided in an accompanying report. A summary of the findings is provided in **section 7.2** below.

The application site is located primarily within the restored landfill with limited biodiversity. A Preliminary Ecological Assessment has been undertaken to assess the potential impact of the proposed development on biodiversity and is summarised in **section 7.3** below.

In addition, there is a requirement for a Flood Risk Assessment (FRA) to be undertaken for any development in excess of 1 ha in area. An FRA has been undertaken and accompanies the planning application; it is summarised in **section 7.4** below.

Whilst there are no residential receptors within close proximity to the site, there is potential for odour arising from the anaerobic processes occurring within the organic media treatment area. This matter would be regulated by the Environment Agency under the Environmental Permit, and an odour management plan has been submitted with the Permit application. A summary is provided in **section 7.5** below for information.

7.2 Landscape and visual

A Landscape & Visual Appraisal (LVA) of potential landscape and visual effects has been undertaken and is provided in full in a separate report submitted in support of the planning application.

At a local level, the landscape appraisal considered that proposed development would partially alter the character of the site to a proposed Leachate Treatment facility on an area of restored landfill within an established area of Industrial Land / Gypsum Works, located within a wider envelope of Wooded Farmland Ridges and Valleys. This would be positioned within and would not alter the published key characteristics of the East Sussex Landscape Character Assessments' LCA 11: Brede Valley for the wider area.

The High Weald AONB extends over approximately 1,500 sq. km, with the proposed development occupying and influencing a small part of the existing British Gypsum Works. The proposed development would not constitute any further noticeable detracting from the five key components of character identified in the AONB Management Plan. The High Weald AONB's essentially rural and human scale character, with woodland and traditional mixed farming would not be affected as a result of the proposals.

The proposed development on this site is likely to result in some minor adverse landscape effects at most during construction.

The Visual appraisal concluded that there would be no effect on the views or visual amenity at the selected representative public viewpoints and associated visual receptors, due to the nature of the proposed development and its immediate landscape context, but also the level of screening and enclosure provided by the

wooded farmland ridges and valleys in the wider area. Whilst the proposed development would be visible from within the existing British Gypsum Works site, this would be within the existing industrial context.

Overall, the LVA concluded that the proposed development would result in limited and site specific/localised landscape and visual effects. The proposed development would not be detrimental to the overall character, qualities and appearance (in views) of the site and its surrounding environment, including the High Weald AONB.

The undulating nature of the surrounding landscape and the dominance of woodland visually contain the site and also mean that there is a limited number and separation to potential visual receptors, such as local residents, road and footpath users.

7.3 Ecology

A desktop study was undertaken in January 2021 which included obtaining up-to-date ecological information held by the local biological records centre. Ecological information was obtained from the Sussex Biodiversity Record Centre (SBRCA). Ordnance Survey (OS) and satellite mapping was also used to gain contextual habitat information. Previous ecological studies undertaken elsewhere within the Robertsbridge were also reviewed, although it is important to distinguish between the broader habitats at the Robertsbridge complex and the site footprint which is dominated by grazed semi-improved grassland.

In addition, a walkover survey of the site was undertaken in 2021 in accordance with CIEEM (2017) '*Guidelines for Preliminary Ecological Appraisal*' (second edition). The Extended Phase 1 Habitat Survey involved site survey to map all areas of habitat on and up the site boundary.

A number of statutory and non-statutory sites for nature conservation were identified within the desk study process. However, the site itself is not covered by any level of statutory protection. The site is ca.50 m from an Local Wildlife Site (LWS), but the site characteristics are not commensurate with the LWS citation. Given the relative distance between the site and protected sites identified during the desk study, and the nature of development proposals, residual effects to the protected sites are considered highly unlikely.

Habitats within the site afford no elevated biodiversity value. Habitat that would be primarily affected by development proposals (i.e. semi-improved grasslands on landfill) are ubiquitous at the Site, local and regional scale.

Proposals at the site do not have the potential to adversely affect protected species.

Measures to enhance the site through the implementation of the project including all habitat creation measures and aquatic monitoring is likely to achieve a ca. 9.3 % net gain for biodiversity at the site level.

7.4 Flood Risk

A Flood Risk Assessment (FRA) has been undertaken in line with BS8533:2017 Assessing and managing flood risk in development: Code of Practice (December 2017), taking account of national and local planning policy and guidance, and all potential sources of flooding to the site have been considered. The FRA is provided in full in a separate report submitted in support of the planning application.

The perimeter of the site is indicated to show a low risk of shallow surface water flooding through adjacent watercourses and access tracks; however, this would not be significant to the proposed development. The surface flow pathways would not be altered by the development proposals.

A screening assessment has reviewed the flood risk posed by other sources including, tidal, fluvial, groundwater, sewer and water mains, reservoirs, canals and infrastructure failure. This concluded that there was no significant risk of flooding at the site.

An outline surface water drainage strategy is proposed for the minor increase in impermeable areas proposed at the site. A single swale is proposed in order to mitigate impacts of changes in storm water runoff from the site, including impacts to water quality.

The swale is to be located to the west of the existing track and adjacent to an existing stream that drains to the River Line, within the eastern extent of the development. Runoff from the buildings will be directed to the proposed swale, prior to controlled discharge to the adjacent stream. Modelling indicates that the swale is sufficient to accommodate up to and including the 1% AEP with a 20% uplift for climate change.

The proposed Surface Water Drainage Strategy proposed within the FRA will ensure that proposed development will not increase the flood risk elsewhere and the runoff will have no adverse impact on the water quality at the point of discharge.

7.5 Odour

Matters relating to the operation of the passive leachate treatment system will be regulated by the Environment Agency through the Environmental Permit. In support of the Permit Variation application submitted in March 2021, an Odour Management Plan was prepared and submitted by SLR on behalf of the Applicant.

The open-air treatment of the leachate within the organic media tanks has the potential to be a source of odour, although it is noted in the Odour Management Plan that there are no sensitive receptors (residential properties) within 300m of the site. The storage of leachate within the underground feed tank and processing of treated leachate within the scrubber system is contained and therefore presents a much-reduced odour potential. Final treatment within the reed beds is not considered to be a significant source of odours. The Odour Management Plan therefore assesses the potential for odour generation and dispersion primarily from the organic media tanks, and sets out proposed management measures for minimising odour and responding on any complaints. Management measures include a system of monitoring and documentation that will be reported to the Environment Agency as required by the Permit.

A copy of the Odour Management Plan accompanies the planning application for information purposes only; it is not considered appropriate for odour to be regulated by the planning authority as this would result in a duplication of controls that is discouraged in Government advice. NPPF paragraph 183 advises that *“the focus of planning decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively”*.

7.6 Other environmental matters

Noise

The application site is remote from noise sensitive receptors, being at least 300m from the nearest residential properties. The proposed leachate treatment system uses passive treatment technology that requires no moving parts other than the pump mechanism that would be installed within a GRP unit and is not expected to generate any noticeable noise at the site boundary. Similarly there would be no noticeable noise emitted from the solar panels and associated equipment.

The proposed development would remove the need for an average of five HGV return journeys per year passing along Eatenden Lane and onto the wider road network.

There would be a temporary increase in noise levels at the site during construction, which would be short term (approximately six months, although activities would not be continuous during this period). Construction management measures would be put in place to ensure that all site activities and deliveries are managed in accordance with good practice.

Land Quality

The proposed development has been designed not to require any footings or earth moving that would affect the integrity of the landfill. As the landfill site is still managed under an Environmental Permit, this would be regulated by the Environment Agency. As such, it is not considered that there would be any environmental effects on land quality.

Water resources

Currently, the site exports 73,000m³ of leachate (contaminated water) per annum from the site, which is a loss to the local water catchment. The proposed development would retain this volume of clean water within the local catchment and provide any opportunity for use either as process water, replacing water drawn from Darwell Reservoir, or for discharge into the River Line which could make a positive contribution at times of low flow.

Traffic and transport

The proposed development would remove the need for an average of five HGV return journeys per day crossing over Eatenden Lane and onto the wider road network. In total, the number of HGV journeys saved per year would be 1,500 return HGV journeys that incur a round trip of 122 km (76 miles).

There would be a temporary increase in traffic levels at the site during construction, which would be short term (approximately six months, although activities would not be continuous during this period). Construction management measures would be put in place to ensure that all site activities and deliveries are managed in accordance with good practice.

Carbon

It is estimated that the proposed development would result in a saving of 182,400 km (114,000 road miles) a year, saving 150 tonnes of carbon per year.

Socio-economic

Robertsbridge Works is a substantial local employee, contributing approximately 100 full time jobs to the local economy and additional economic benefit in terms of contribution to the local supply chain through purchase of goods and services. The proposed development is expected to improve the economic efficiency of the Works, helping to secure its long term future as a major local employer.

8.0 Conclusion

The proposed development would replace the current unsustainable management of leachate from former landfills within the Robertsbridge Works complex with a passive treatment process that relies on natural biological processes and renewable (solar) energy to provide a long term, sustainable solution. Environmental benefits would result in respect of traffic movements, carbon footprint, water resources and biodiversity.

Potential adverse environmental impacts have been considered in terms of landscape and visual impact, flood risk, ecology and odour. The design of the facility and proposed management systems that would be put in place would ensure there would no significant adverse environmental impacts. Any temporary adverse impacts during construction would be short term and would be more than offset by the long term benefits.

In summary, the proposed development would improve the operational efficiency of the Robertsbridge Works, allowing the facility to continue to make a significant contribution to the local and national economy through the supply of essential construction materials and employment. The proposed development is considered to be in accordance with national and local planning policy, and it is therefore requested that planning permission is granted without delay.

EUROPEAN OFFICES

United Kingdom

AYLESBURY

T: +44 (0)1844 337380

BELFAST

T: +44 (0)28 9073 2493

BRADFORD-ON-AVON

T: +44 (0)1225 309400

BRISTOL

T: +44 (0)117 906 4280

CAMBRIDGE

T: +44 (0)1223 813805

CARDIFF

T: +44 (0)29 2049 1010

CHELMSFORD

T: +44 (0)1245 392170

EDINBURGH

T: +44 (0)131 335 6830

EXETER

T: +44 (0)1392 490152

GLASGOW

T: +44 (0)141 353 5037

GUILDFORD

T: +44 (0)1483 889800

LEEDS

T: +44 (0)113 258 0650

LONDON

T: +44 (0)203 805 6418

MAIDSTONE

T: +44 (0)1622 609242

MANCHESTER

T: +44 (0)161 872 7564

NEWCASTLE UPON TYNE

T: +44 (0)191 261 1966

NOTTINGHAM

T: +44 (0)115 964 7280

SHEFFIELD

T: +44 (0)114 245 5153

SHREWSBURY

T: +44 (0)1743 23 9250

STAFFORD

T: +44 (0)1785 241755

STIRLING

T: +44 (0)1786 239900

WORCESTER

T: +44 (0)1905 751310

Ireland

DUBLIN

T: +353 (0)1 296 4667

France

GRENOBLE

T: +33 (0)6 23 37 14 14