

**REDLYNCH: PROPOSED RELOCATION OF RECYCLING FACILITY
AND THE CONSTRUCTION OF A PROTECTIVE ROOFED STRUCTURE AT
POUND BOTTOM LANDFILL SITE, HAMPTWORTH ESTATE, REDLYNCH FOR
CLEANSING SERVICES GROUP
(Application No. S.04.0889)**

Purpose of Report

1. To consider the above application and to recommend that planning permission be granted subject to conditions.

Background

2. Planning permission was first granted for waste disposal at Pound Bottom, Redlynch in 1978 with further permissions being granted in 1987 and 1989. In 1991, planning permission (S.90.0485) was granted for sand extraction and waste disposal on a new area of 11.94 hectares known as Pound Bottom Phase IV. The sand reserves permitted at that time have been exhausted, but the site still receives industrial/commercial and construction waste for landfilling mainly from Hampshire. On the 30th September, 1996 planning permission was granted for recycling/shredding operations at the site (S.96.0116). On 24th July, 2002 a planning application to extract a sand and gravel deposit from an adjoining site (Big Field) was refused on policy, need and environmental impact grounds. Finally, and most recently, on 11th March, 2003 planning permission was granted for a composting facility to process shredded, recycled and green waste. This is a temporary permission for three years.

The Site

3. The Pound Bottom Site is located close to the Hampshire-Wiltshire boundary approximately 3km south east of Hale and Woodfalls and 14km from Salisbury (see **Appendix 1**). The application site area is generally flat and bounded to the north, east and south by woodland, to the north-west by the internal haul road and access road beyond which lies the landfilled and restored area, Phase 2. To the west of the site is scrubland.
4. The nearest residential property to the application site is Windyeats Farm which lies approximately 520m to the west. A public right of way lies some 280m to the north-east of the site.

The Application

5. The application seeks planning permission to relocate the existing open-air recycling facility from the landfill area (Cell 13) to a location within the north-eastern corner of the composting facility (Planning Permission S.02.2169) as indicated in **Appendix 2**.

6. The area of the application is approximately 1,600 square metres and lies some 100m to the north-west of the weighbridge. The existing recycling operation has the benefit of planning permission until 31st December, 2005 or upon completion of the landfilling.
7. Trials have been undertaken which confirm that it is possible to use screened lightweight material from recycling as a base material for composting, and also, secondary aggregates can be produced from construction and demolition waste.
8. These trials identified the requirement to house the recycling plant and feedstock within a 12m high building. In addition to providing optimum conditions for the recycling equipment, feedstock and storage of the product prior to composting, the 30m x 30m steel clad building would provide noise attenuation as well as containing dust. It is proposed that the operation would handle the following: hardcore, soil, wood, metal, plastics and paper/cardboard.
9. There would be no additional vehicle movements associated with the relocation of the facility.
10. It is proposed that the hours of operation of the plant and machinery would be:

0700 – 1700 Monday – Friday
0700 – 1300 Saturdays

These would accord with the present hours of opening of the site.

Planning Policy

11. Policies W1-W4 of the Wiltshire Structure Plan 2011 (adopted January 2001) are considered relevant to this application. Policies 1, 2, 3, 6 and 11 of the Wiltshire and Swindon Waste Local Plan Modifications Draft September 2004 are also considered relevant to this application, together with Policy HA1 of the Salisbury Adopted Local Plan - June 2003. (**Appendix 3**)

Consultations

12. **Salisbury District Council** – no objections to the proposals subject to conditions.
13. **Salisbury District Council Environmental Health Officer** – no objections.
14. **Redlynch Parish Council** – no objections to the application. Temporary permission to be carried forward.
15. **Downton Parish Council** – no objections.
16. **Hale Parish Council** – supports the application subject to a number of provisos.
17. **Bramshaw Parish Council** – no comments received.

18. **New Forest District Council** – raises strong objections for the following reasons:-
- (i) Site lies within the New Forest Heritage Area (NFHA) and proposed National Park.
 - (ii) Recycling of waste materials is an inappropriate use of land in a protected landscape.
 - (iii) Proposed development would extend the use beyond the expiry of the existing temporary permission (to December 2005) or the completion of the landfilling. This is unacceptable.
 - (iv) Development would perpetuate inappropriate heavy goods vehicle movements on unsuitable forest roads.
19. **New Forest Committee** – requests Wiltshire County Council to refuse application on the grounds of:-
- The application pre-empted the need for further time extensions on the existing composting and recycling facilities which generates significant levels of HGV traffic within the New Forest.
20. **Hampshire County Council** – no objections.
21. **Godshill Parish Council** – objects to the application on the following grounds:-
- (i) Assumes that temporary permission for the existing composting facility will be extended.
 - (ii) Concern regarding no firm completion date for waste handling activities at Pound Bottom.
 - (iii) Proposed development would considerably increase the surface area of activities by delivering all waste materials to an area adjacent to the existing site area rather than into the actual landfill area.
 - (iv) Any permission granted should be conditioned strictly, confining composting and recycling activities to the present sources of materials with a time limited permission.
 - (v) Six sevenths of the site's business comes from Hampshire which leads to heavy vehicle traffic having to cross the precious and vulnerable ecology of the New Forest. If an alternative route were provided from the A36 then the proximity principle might be said to apply as far as Salisbury and Southampton are concerned.
 - (vi) Parish Council does not agree that there will be no additional HGV movements associated with the development as recycling area will need to be constructed. Also, life of site would be extended so vehicles will be accessing site for a longer period of time.
22. **English Nature** – no objections to the proposals subject to the requirement to produce a method statement showing measures to be put in place to protect the New Forest SSSI during and after construction. (This would be required by condition).

23. **Countryside Agency** – no observations.
24. **Environment Agency** – no objections in principle to the proposals subject to conditions.
25. **Campaign to Protect Rural England** – no objection in principle to the proposals, although acknowledge that there are good points and matters of concern. Overall, support the current application subject to time constraints.
26. **Forestry and Countryside Officer** – there are no proposals within the application to carry out internal landscaping. Space exists for this and the site would benefit from some additional tree and shrub planting. (This would be required by condition).
27. **Countryside Officer – (Ecology)** – initially concerned that it was proposed to discharge surface water drainage into a local surface watercourse ditch and the possible long-term effects this would have on the New Forest Candidate Special Area of Conservation (cSAC). Further information was subsequently provided by the applicant which confirmed that drainage from the concrete hardstanding would empty into a sealed tank and would be tankered away. Therefore no “significant effects” are likely to occur to the cSAC.
28. **Highways Development Control** – no objections.
29. All the above consultation responses are available for inspection in the **Members’ Room**.

Publicity

30. The application was advertised by site notices and in the local paper circulated in the locality. No letters of representation have been received.

Planning Considerations

31. The application should be judged on its merits and in the light of relevant Development Plan policies unless material considerations indicate otherwise. The main issues to be considered are:-

- Conformity with national, strategic and local policy
- Environmental implications of the development

Conformity with national, strategic and local policy

National Waste Policy

32. Composting and recycling lie at the heart of the National Waste Strategy in the UK and will continue to form an important option in helping the UK meet the targets set in the EU Landfill Directive.
33. The Strategy calls for more sustainable waste management technologies which will provide for recycling or composting of 25% of landfill waste by 2005, 30% by 2010 and 33% by 2015. Recycling and composting activities will need to expand dramatically to meet these targets. The proposal at Pound Bottom conforms with the Strategy and can be seen as a positive step towards achieving these targets, particularly as it is proposed to use the lightweight fractions from the recycling as a base for the composting process carried out on site.

34. The proposed production of secondary aggregate from recycled construction and demolition waste conforms with Mineral Planning Guidance Note 6 (MPG6) which seeks the reuse of aggregates wherever possible in order to preserve primary materials for future requirements.

National Park Status

35. The Pound Bottom site now lies within the New Forest National Park and with this status goes a higher level of protection for the environment and a more rigorous assessment of proposals within its boundary.
36. Three consultees (New Forest District Council, New Forest Committee and Godshill Parish Council in Hampshire) have objected to the proposals to relocate the recycling facility at Pound Bottom on the basis that it is not consistent with the designation of the area as a National Park. Concern is raised regarding the potential environmental impact it could have locally, particularly as a traffic generator. However, for the reasons identified in paragraphs 45 to 66 it is considered that these concerns are unfounded. The recycling of materials has taken place at the Pound Bottom site without any complaint since 1996. The proposed recycling would take place within a building which would limit the environmental impact still further. Therefore, it is not considered that the overall character of the New Forest would be detrimentally affected in terms of environmental impact by having a recycling facility relocated within the Pound Bottom site. With regard to traffic, this is not proposed to increase.

Strategic Policy – Adopted Wiltshire Structure Plan 2011

37. At the strategic level, Policies W1 – W4 of the Wiltshire and Swindon Structure Plan 2011 (Adopted January 2001) (set out in **Appendix 3**) support waste minimisation and recycling proposals subject to their environmental impact being acceptable and meeting other criteria, e.g. Best Practicable Environmental Option (BPEO), proximity principle, etc. These issues are considered in more detail in the following two sections which look at local waste policy (Wiltshire and Swindon Waste Local Plan) implications and the environmental implications of the development.

Local Policy – Wiltshire and Swindon Waste Local Plan 2011 – Modifications Draft – September 2004

38. The main policies of the Waste Local Plan relevant to the consideration of this proposal are Policies 1, 2, 3, 6 and 11. These are set out in **Appendix 3**.
39. **Policy 11** specifically considers recycling facilities outside of Preferred Areas and suggests that permission should be granted where such facilities are located in association with other waste development or at current landfill sites as long as it will not unduly prejudice the agreed restoration timetable for the site and that it meets other environmental criteria of the Plan. Although concerns have been raised by a number of consultees that granting approval for the recycling facility at Pound Bottom would prolong the timescale for restoration of the site, the following points should be made:-
- (i) The landfill at Pound Bottom does not currently have a defined timescale attached to the planning permission which determines an end date by which the site should be fully restored, and,

- (ii) Whilst national and local policy is moving away from the granting of further planning permissions for new landfill sites, there is an acceptance and understanding that current landfill sites should be used as effectively and as efficiently as possible by ensuring that only non-recyclable waste goes into them and that recyclable waste should be recycled and re-used. In this respect, although the continuation of recycling at Pound Bottom may prolong the restoration timescale of the site, it would ensure that the site is used in an efficient manner for waste which cannot be recycled or re-used.
40. **Policy 1** of the Plan considers sustainable waste management and the BPEO. The proposal at Pound Bottom accords with the proximity principle in that the source of waste is found locally and the proposal, if granted planning permission, would provide a feedstock for the existing composting facility on site. Putting the plant within a purpose-built contained building would ensure that the proposal further accords with the BPEO.
41. The proposal is considered to conform with **Policy 2** which deals with the need for waste development and regional self-sufficiency, in that it meets both a cross-boundary and local need to recycle waste. The existing recycling facility at Pound Bottom has been operating since the mid 1990s.
42. Because the current recycling facility is located on the existing operational landfill area, it needs relocating in order to allow the landfill to be restored in accordance with the agreed restoration scheme for the site. Relocating the facility to the composting area would lead to a better integration of recycling and composting activities and to a more efficient operation.
43. **Policy 6** of the Waste Local Plan concerns environmental protection, human health and amenity and transport. It sets out a list of criteria which any proposal would have to meet in order to be considered acceptable, for example, safeguarding amenity of any nearby dwellings, control of noise, light, air emissions and traffic movements, etc. These issues are dealt with in paragraphs 45 to 57 of the report.

Salisbury District Local Plan Adopted 2003

44. The main policy which relates to the development is Policy HA1 which states that development will not be permitted in the New Forest area if it would have an adverse impact on the overall character of the area and/or lead to an intensification of existing uses on the New Forest (see **Appendix 3**). The policy is in line with National Planning Guidance (PPG7) relating to development in the countryside, the main aim of which is to resist all activities which could adversely affect the overall character, natural beauty, ecology, etc. of the New Forest whilst allowing limited development to sustain the local economy. For the reasons set out in paragraphs 45 to 66 it is considered that the relocation of an existing recycling facility would not adversely affect the overall character of the New Forest to such a degree that it would warrant a refusal of planning permission.

Environmental Implications of the Development

45. Policy 6 of the Waste Local Plan looks at the need to consider the variety of environmental impacts which can be associated with the type of development proposed. These are considered below.

Noise

46. Inevitably, a degree of noise is associated with the existing recycling operation on the site and can be anticipated to occur in the new proposed relocated site. An assessment of the impact of noise from the proposed relocated recycling facility on the nearest residential property (i.e. Windyeats Farm), some 520 metres to the west of the site has been undertaken. The assessment concluded that, taking a worst case scenario, the predicted noise level is slightly above the background noise level but within the MPG 11 and BS4142 assessment criteria. A condition restricting noise levels would be imposed on any permission granted.

Dust

47. Although generation of airborne dust associated with transportation, stockpiling, tipping, screening etc. is possible, this will be reduced by the majority of material handling and processing taking place within a covered building. In addition, internal haul roads would be dampened down using a water bowser, as would stockpiles of processed material exposed during dry periods. Through these various means, dust would not be a problem. A condition would be imposed to control dust.

Odour

48. Because the materials to be recycled are not generally of a biodegradable nature, it is unlikely that odour would be a problem. The recycling products would be used in conjunction with Ecopod composting technology on site. This enables the odours commonly experienced with the typical “windrow” style composting procedures used elsewhere in the country to be eliminated due to the sealed nature of the Pods during the entire aerobic composting process.

Ecology

49. Initially, concerns were raised by English Nature and by the County Council's Ecologist regarding potential impact on the New Forest cSAC as a result of the original drainage system which could have impacted significantly on the area. These concerns have been taken up with the applicant and a sealed tank system will be installed and the contents tankered away to a licensed site for disposal.
50. In addition to this, the recycling facility, if granted permission, would be located within the footprint of the approved composting site and therefore the development would have no greater impact on the surrounding flora and fauna. The County Ecologist has confirmed that “significant effects to the New Forest cSAC are not likely to occur”.
51. The implications of the proposed development for the national and international nature conservation interests of the National Park have been considered in consultation with English Nature and the County Council's Ecologist. Safeguards will be put in place to provide protection for these important areas.

Visual Impact/Landscape Impact

52. No adverse visual impact is anticipated by the proposed development. The location of the recycling facility adjacent to the existing composting facility would ensure that the whole complex is well screened from public view and can only be seen from within the site. There is no direct sight line between nearest property (Windyeats Farm) and the proposed building.

53. Although the proposal would not have a visual impact outside the site, the County Landscape Officer has suggested that internal landscaping in the form of tree and shrub planting would benefit the site. This would be required by a condition attached to any planning permission granted.

Litter

54. Because the process is to be carried out within a purpose built building, it is not considered that litter would be a problem. Any litter which may escape at the beginning or end of the process would be picked up by landfill personnel on site.

Pests and Vermin

55. Because the normal materials to be recycled are of an “inert” nature, these are not the types of materials which would attract pest and vermin to the site and by having the recycling facility within a building this further ensures that this would not be a problem.

Effect on Ground Water and Surface Water

56. As mentioned previously, it was originally proposed to use a three stage storage system to collect surface water and then discharge it, via an interceptor, to a surface water ditch. This is not considered to be acceptable by the County Ecologist and English Nature due to the possible impact this could have on the New Forest cSAC. The applicant has looked further at this and has confirmed in a letter dated 9th July, 2004 that the surface water from all the concrete hardstanding area would be directed by engineered gradients to a sealed tank which would be tankered away to a suitably licensed facility. This will ensure protection to local ground and surface water.

Traffic Generation

57. The proposal is to relocate an existing recycling facility within the landfill site and therefore no additional vehicle movements would be associated with the proposal.

Conclusions

58. The application must be judged on its merits and against relevant Development Plan policies and all other material considerations. The proposal involves relocating an existing recycling facility to an alternative part of the site adjacent to an existing composting facility and installing it within a building to reduce noise, visual impact, and to ensure the recycled product is kept dry.
59. The two main issues to be resolved are:-
- (i) The importance of recycling (and composting) in the national waste strategy in terms of developing more sustainable waste management technologies to achieve national targets.
 - (ii) The location of the site within what is to become the New Forest National Park.

60. On balance, as a result of the consultation process carried out, taking into consideration the fact that the recycling facility exists at present within the landfill site and the fact that the machinery would be contained within a building to reduce noise and visual impact, it is concluded that the development proposed should be allowed to go ahead on a time limited basis linked to the life of the landfill site.
61. Should planning permission be granted, a condition would be imposed which would require the use of the recycling facility to cease when landfilling is completed. This would ensure that the restoration of the whole Pound Bottom complex is not prejudiced.
62. Although the proposed facility is within the New Forest National Park, it is already there in some form and has not been the source of complaints from local residents. The proposed facility would be contained within a purpose-built building and should therefore be even less conspicuous than the current operation.
63. At the strategic and local levels there is support for waste minimisation and recycling proposals subject to their environmental impact being acceptable and to them meeting other criteria, e.g. BPEO, proximity principle, etc. The proposal for recycling at Pound Bottom would use modern equipment within a purpose-built building thus eliminating the normal environmental impacts associated with open-air recycling. Because of this controlled environment and the local need for the facility it is concluded that its relocation within an existing landfill site is justified and that it does accord with the policy criteria and is the BPEO.
64. The environmental impacts of the proposals have been considered and it has been demonstrated that they would be minimal in terms of such matters as noise, visual impact, dust, odour, pests and vermin, litter, ecology, surface and ground water, ecology and traffic generation (no change).
65. Officers consider that the objections raised by New Forest District Council, New Forest Committee and Godshill Parish Council regarding prolonging the life of the existing landfill in terms of HGV traffic on New Forest roads are outweighed by the benefits gained by diverting recyclable waste away from landfill.
66. Overall, it is considered that this application is in accordance with the relevant policy criteria of the Development Plans and there are no overriding material planning objections which would justify refusal.

Recommendation

67. That planning permission be granted subject to the following conditions:-
 1. The development hereby granted shall commence within five years from the date of this permission.
 2. The development hereby permitted shall be undertaken in accordance with the submitted application No. S.04.0889 and as shown on Drawings Nos. CSG/PBP/SEC/01 dated January 2004, CSG/PBP/LAY/01 dated February 2004 and CSG/PBP/APP/01 dated February 2004.
 3. This permission shall be limited to a period of 10 years from the date of the decision notice or to the cessation of landfilling at Pound Bottom, whichever is the sooner.

4. Prior to the commencement of development a detailed scheme for landscaping the site shall be submitted to and approved in writing by the Waste Planning Authority. Such scheme shall include details of:-
- (i) The positions, species and sizes of all existing trees, shrubs and hedgerows to be retained and the proposals for their protection throughout the operations.
 - (ii) The position, species, density and initial sizes of all new trees and shrubs.
 - (iii) Any hard landscaping proposed.
 - (iv) The programme of implementation of the scheme.
 - (v) The arrangements for subsequent maintenance.

The scheme as approved shall be carried out in full (unless the previous approval of the Waste Planning Authority is received in writing to any variation).

5. Prior to the commencement of development a scheme for the restoration of the site shall be submitted to and approved in writing by the Waste Planning Authority.
6. No later than 12 months from the cessation of tipping or within such further period as the Waste Planning Authority may agree in writing, all plant and machinery, foundations, hardstandings and access roads no longer required in connection with the recycling facility shall be removed and the site restored in accordance with the approved restoration scheme.
7. Prior to the commencement of development a Method Statement shall be submitted to and approved in writing by the Waste Planning Authority. Such Statement shall include measures to safeguard the cSAC and SSSIs during and after construction of the recycling facility.
8. Prior to the commencement of the development a sample of the colour cladding proposed for the exterior of the recycling building shall be submitted to and approved in writing by the Waste Planning Authority.
9. Recycling activities shall only take place during the following hours:-
- | | |
|---------------|---------------|
| 07.00 - 17.00 | Monday-Friday |
| 07.00 - 13.00 | Saturday |

There shall be no operations on Sundays or Bank or Public Holidays.

10. The level of noise emitted as a result of operations associated with the development hereby permitted shall not exceed 45dB(A) when measured at a height of 1.2m above ground and 3.6m from the facade of the nearest residential property or other occupied buildings. For temporary operations such as soil stripping, bund formation and other mitigation measures, the noise level at the nearest residential property or other occupied buildings shall not exceed 70dB(A).

11. The site access road, hard surfaced areas and stockpiles of material shall be treated with an approved dust laying agent at such times as may be necessary to prevent dust nuisance arising.

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The following unpublished documents have been relied on in the preparation of this Report:

Consultation replies and correspondence

