



via e-mail

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Your Ref: FUL/2023/0005
Date: 04 May 2023

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Dear Michael

Sheringham Recycling Centre: reference FUL/2023/0005

Further to your email dated 31 March 2023 [REDACTED] and following the statutory consultation period for the Sheringham Recycling Centre planning application, reference FUL/2023/0005, the comments made have been reviewed.

Please find below the applicant's response to the comments, which have been grouped together and addressed as themes.

Planning Policy Constraints

1. *Justification of the proposal in-line with paragraph 176 of the National Planning Policy Framework (2021).*

The National Planning Policy Framework paragraphs 176 and 177 relate to development within an Area of Outstanding Natural Beauty (AONB) and state:

'176. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

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177. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.¹

It is acknowledged that the proposed site is located within the Norfolk Coast AONB, as is the existing Sheringham Recycling Centre. Provision of a well-located recycling centre to serve the residents of Sheringham and Cromer is likely to be either in or close to the AONB. The proposed site was selected following careful consideration of alternatives, including extension of the nearby existing site (please refer to 'Site Selection' below).

Norfolk County Council has a statutory duty under the Environmental Protection Act 1990 to provide places for residents to dispose of their waste. The County Council provides 20 recycling centres across the county for Norfolk residents to access for the disposal and recycling of material. The current Sheringham Recycling Centre is one of the county's smaller sites by area, at approximately 938m², but is one of the busier sites, both in visitor numbers and tonnage throughput. The limited size of the site restricts the ability to offer enhanced services, such as a reuse shop, trade waste service or introduction of recycling for additional materials. Additionally, the site has limited parking leading to staff having to park on the adjacent layby itself, with visitors to the site often deciding to park outside the recycling centre and carry materials in.

The County Council has a number of policies approved by its Full Council in place for dealing with household and commercial waste. These include the need to minimise as far as possible residual waste requiring disposal; to support and allow for an increase in repair, reduction, re-use, recycling and composting of waste; to promote waste awareness through public education and awareness campaigns and to develop an understanding of the full range of options available for dealing with waste.

The County Council has adopted a service standard with the aim that over 90% of residents would be within a twenty-minute drive of a recycling centre where economically practicable. In addition, it has agreed to move towards zero waste as part of a drive to reduce waste sent for disposal and increase levels of reuse and recycling.

A new recycling centre for north Norfolk at Sheringham will support these County Council policies by providing a strategically located and accessible recycling facility with improved opportunities for reuse on site. If the proposed new site is not approved, the opportunity to improve accessibility and a site fit for future use will not be available.

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If in future the existing site is deemed not fit for purpose and no replacement is available, then residents would be required to travel to alternative locations with the next closest available sites being Worstead Recycling Centre, Wells Recycling Centre, Norwich North Recycling Centre or Hempton Recycling Centre, all representing significant journey times for residents.

Given the extent of the AONB in the area, there was limited scope to site the recycling centre outside of it whilst still providing a facility that is accessible for residents of Sheringham and Cromer and with good transport links for operational vehicles. The site search, as outlined in the Planning Statement and further detailed in this letter, found limited alternative available sites and of these, alternatives were deemed to not be appropriate development areas for a recycling centre in planning policy. The location selected for the proposed recycling centre, whilst in the AONB, is very close to the existing facility and very well located for access by residents and operational vehicles alike. This connectivity to the strategic road network is considered a great advantage and preferable to a location outside of the AONB but in a more rural, remote location without good access to the road network.

The proposal is not considered discordant with the existing site and will be appropriately softened through existing local tree cover and proposed planting, as detailed with the Landscape and Visual Appraisal and with further information outlined within this letter.

2. Further justification of how the proposal aligns with the AONB Management Plan.

The Norfolk Coast AONB 2019-2024 Management Plan has been withdrawn following a review and as a result the 2014-2019 Management Plan is currently in use. The landscape character of the area has been detailed and assessed within the submitted Landscape and Visual Appraisal, which notes that despite the Cromer Ridge having sometimes steep scarp slopes and irregular undulations, the Site itself and its immediate surround is relatively flat, with a difference of approximately only 1.7m AOD from west to east across the Site. Whilst the immediate context of the Site is agricultural, there is also a strong presence of woodland that creates visual enclosure in contrast with longer views from the Site. The views are limited in particular by woods and plantations to the west, north and east of the Site.

The immediate context to the Site is capable of some change. This ability to accept change is due to the wide mix of woodland types that are mixed together to form a cohesive area of woodland that extends along the Cromer Ridge. The presence of this woodland in the farmed landscape, along with the low-level nature of the Development would have a key role in reducing the magnitude of change and in mitigating the presence of the Development in the AONB to an acceptable level in planning terms.

The proposed development contains sustainability measures to reduce its impact on the local environment. These include:

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- Onsite treatment of surface water through sustainable drainage.
- No external lighting.
- Onsite and offsite planting to soften the visual appearance of the site.
- Renewable energy generation to support the operations of the recycling centre.

This is considered to be in support of Policy PB4 demonstrating good practice in incorporating measures for energy, water use, resource reduction and biodiversity enhancements sensitively.

Improvements to the site capacity and accessibility will reduce congestion around the existing recycling centre, particularly when bins are being exchanged, supporting Policy PC7 and will support the needs of the community (Policy PC9) through provision of a modern facility to encourage recycling and reuse over disposal.

Whilst it is recognised that the proposed site is located within the AONB, on balance it is considered that the provision of a facility to meet the needs of the community on a site that is well linked to the main road network and with the inclusion of mitigation to enhance the landscape and biodiversity on site, means that the proposal is acceptable in this location.

3. *Potential conflict with the North Norfolk Local Plan Policy EN1 and EN2 need to be justified.*

Policy EN1 of the North Norfolk Local Plan states that '*Development will be permitted where it; is appropriate to the economic, social and environmental well-being of the area or is desirable for the understanding and enjoyment of the area; does not detract from the special qualities of the Norfolk Coast AONB or The Broads; and seeks to facilitate delivery of the Norfolk Coast AONB management plan objectives.*'

The proposed development is considered beneficial to the local community providing an easily accessible modern facility to support the reuse and recycling of materials and ensuring the appropriate treatment and disposal of waste. The impact of the development on the AONB has been carefully considered within the planning application, notably the Landscape and Visual Appraisal, and further detail on the impact to the AONB is provided within this letter.

Policy EN2, Protection and Enhancement of Landscape and Settlement Character, is addressed with the Landscape and Visual Appraisal which concludes that the Development would bring forward proposed mitigation, that over time would have beneficial effects through creating new landscape features such as hedgerows and tree groups. These features would assimilate with these cohesive areas of woodland and in same manner as the 'planted' settlements and 'plotlands', the Development would benefit from having a comfortable presence in the landscape.

The development of the recycling centre has been kept low level with single storey buildings, and mitigation through planting. Additionally, boundary fences are proposed to be green chainlink to soften their appearance. Overall, it is considered that the location and scale of the proposed development is appropriate and does not conflict with policy EN2.

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Site Selection

1. *Further details on why the existing site cannot be extended as this is considered more appropriate.*

Considerable thought was given to the option to extend the current site in the early stages of this project. There were several significant difficulties with extending the site, which ultimately found it to be unachievable and therefore this option was not pursued.

Extension to the west of the existing site would involve development in an area of established woodland and from early consultation advice from the County Council's Natural Environment Team it was clear that removal of this woodland would not be supported.

Additionally, the interaction of the site with the existing A148 junction meant that a suitable junction improvement could not be achieved with the entry or exit to the recycling centre being located too close to this junction to provide safe access.

Furthermore, and crucially, the land where the existing site is located is too narrow to provide a suitable site for a modern facility. Currently, vehicles servicing the bins on this site are heavily constrained and cannot fully access bins with the gates closed. Moving to a new site provides an opportunity for a safer and more modern site design for the benefit of the site operator and customers.

An example of the early concept work is included within the Planning Statement (Figure 3, page 8), which highlights the issues of proximity to the junction along with an unsatisfactory layout where containers are difficult to access and service.

Following this early work to consider expansion options for the current site, a site search was undertaken to assess alternative options. As noted in the Planning Statement, there was a very limited number of potential sites identified and options were excluded from further consideration due to their proximity to residential areas and holiday accommodation and where they were considered to conflict with local planning policy.

Natural Environment

1. *Loss of trees needs to be addressed with replacement planting agreed prior to determination.*

The Arboricultural Impact Assessment submitted with the planning application shows that 11 trees are to be removed to enable the development (see Arboricultural Impact Assessment Tree Removal Plan ref 6985,EC,AR/002/rev0). The Landscape and Visual Appraisal Addendum and Landscape Mitigation Plan (both provided with this letter) provide detail of a significantly greater number trees to be planted within the proposed recycling centre as a replacement to those lost and to provide appropriate visual screening. This plan also provides the details of the species of trees proposed.

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Following a review of the Landscape and Visual Appraisal and proposed planting, the applicant has enhanced the proposed planting to include a further area of significant planting on the old section of carriageway being taken up, further details of this are outlined in point 4 below.

- 2. Reports updated to take account of the loss of trees along the southern boundary including the Preliminary Ecological Appraisal and Biodiversity Net Gain Feasibility.*

The Preliminary Ecological Appraisal and Biodiversity Net Gain Feasibility reports are being updated to account for the subsequent additional planting that has recently been proposed by the applicant in the old section of carriageway. An addendum to these reports is expected to be submitted subsequent to this letter week commencing 08 May 2023.

- 3. Recommend species based features.*

This aspect will be addressed alongside the updated Preliminary Ecological Appraisal and Biodiversity Net Gain Feasibility reports to be provided subsequent to this letter and expected to be submitted week commencing 08 May 2023.

- 4. Further details to demonstrate the habitat creation is feasible in the area of broken up carriageway.*

An addendum to the Landscape and Visual Appraisal and Landscape Mitigation Plan (both provided with this letter) have been provided to include additional planting in the old section of carriageway. It is proposed that the old road construction is planed out and the sub-grade loosened giving a depth of approximately 300mm for topsoil to be placed. 1m³ tree pits can be dug and backfilled with topsoil being located to avoid underground utilities. Tree species suitable for this shallow area have been selected and will be detailed in the updated Preliminary Ecological Appraisal and Biodiversity Net Gain Feasibility reports due to be provided week commencing 08 May 2023.

- 5. Condition a Landscape and Ecological Management Plan.*

The applicant accepts that a Landscape and Ecological Management Plan (LEMP) will be required should consent be granted and that this should be dealt with by condition.

- 6. Legal agreement for long term management of biodiversity plan.*

The long-term management of the biodiversity will be dealt with through the LEMP and subject to an appropriate condition and future monitoring.

- 7. Potential need for additional surveys for ecology.*

The need for additional ecology surveys will be reviewed as part of the Landscape and Ecological Mitigation Plan as suggested by the County Council's ecologist.

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8. *Suggested ecology conditions by the District Council Ecologist.*

The North Norfolk District Council's ecologists suggests two conditions. Firstly, a Construction Ecological Management Plan, which can be provided under a condition. Secondly, a condition for further detail on lighting, however, as noted elsewhere within this letter a lighting strategy is not proposed and therefore this condition is not necessary.

In addition to the points above, the applicant is proposing to amend the chain link fence to a green chain link fence to reduce its visual impact.

Noise

1. *Reduction in the permitted construction hours to 08:00 – 18:00 Monday to Friday and 08:00 – 13:00 on Saturday.*

This point is accepted, and construction hours will be set to reflect these hours.

2. *Updates to the Noise Impact Assessment in regards to noise levels at the 4 receptors in relation to impact noise and consideration of noise impact on other activity centre land to the west.*

The Environmental Health Officer's response suggests that maximum noise levels have not been addressed. However, the assessment has included corrections for 'impulsivity' as per the correct assessment method and it is considered that this is a correct and appropriate assessment methodology, given that there is no standardised way of assessing maximum noise levels in isolation within the agreed assessment method.

The Hilltop Activity Centre archery games and caving areas to the west are not considered to be as sensitive as the woodland school area to the north of the site and due to proximity to the main road and the existing recycling centre was not included within the assessment.

3. *Suggest inclusion of a 2.5 metre noise barrier to the west boundary.*

The noise assessment concludes that an acoustic barrier should be provided only as mitigation on the northern boundary of the site. However, and whilst it is not considered a requirement, the applicant will extend the acoustic fence along the western boundary to provide additional noise attenuation above that which is considered necessary.

Lighting

Comments on the lack of a lighting proposal were included in responses from the Norfolk Coast Partnership, The Countryside Charity, North Norfolk District Council and the Environmental Health Officer.

As noted in the Sustainability Statement submitted with the application, lighting has been largely designed out of the scheme, with the proposal to only operate the site for public use during daylight hours.

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The current operating hours for the Norfolk Recycling Centre service set by the County Council are 09:00 to 16:00 year-round. Internal lighting will be present within the site office and the reuse shop, which will be energy efficient LED lighting. The proposed new site will operate on the same basis as the existing site, which does not have a lighting scheme. Out of hours security is monitored through CCTV and has motion detection but does not require the site to be lit.

The Local List requires a lighting assessment where external lighting is proposed and it is a major application. Given the site does not propose external lighting, a lighting assessment is not considered to be a requirement of this application.

Highways

- 1. Details on a formal TRO to ensure the western access onto the A148 is an in-only junction and is considered essential.*

Following further discussion, the applicant is satisfied with a condition requiring them to promote a Traffic Regulation Order for the western access onto the A148 to be an in-only junction.

- 2. Removal of permitted uses on the existing waste site to ensure the proposal would not significantly increase traffic generation of this site were to be used.*

The planning permission for Sheringham Recycling Centre, reference 1/91/1687, is only for the benefit of Norfolk County Council as a Waste Disposal Authority. It was originally granted under the 1976 General Regulations for the benefit of the local authority only. Unlike a normal planning permission, it does not run with the land so it could only be reactivated by the local authority which applied for the permission. A subsequent application to change the opening hours in 1993, reference C/93/1012, was applied for solely by the County Council and not jointly with another applicant, therefore it only ensures for the benefit of the County Council.

Following the opening of the new Recycling Centre, the existing site will be permanently closed and the environmental permit surrendered, preventing it from being operated as a waste site and the County Council agreed to then dispose of the existing site at its Cabinet meeting on 22 January 2021. The site will not benefit from the current planning permission and therefore any future use will be subject to a new planning application.

- 3. Concerns raised regarding the traffic management of vehicles leaving the site and issues with the proposed T-junction.*

Beeston Regis Parish Council raised concerns over vehicles leaving the site and turning left from the new junction. Their response questions the need for the junction improvement proposed given that the existing site has operated for over thirty years with the current road system. This response conflicts with the view of the Highway Authority which indicated that an improved junction is required and, in turn, that this is the junction used when exiting the layby. Further confirmation of this is provided in point (1) of this section noting the promotion of a Traffic Regulation Order to formalise this. *Continued.../*

Historic Environment

Although this was not raised in your email, it is noted that the County Council's Historic Environment Team has requested conditions be applied in relation to the potential for unidentified heritage assets, and the applicant is content with the proposed conditions.

Comments from Individuals

Three responses from individuals were published at the time of writing this response:

1. Concern was raised about the potential closure of Mayton Wood Recycling Centre and the distance to travel to the proposed new Sheringham Recycling Centre. The proposed closure of Mayton Wood Recycling Centre is not linked to the proposed new Sheringham Recycling Centre. It has been put forward as part of the County Council's wider budget saving proposals and is subject to further consultation. However, if the site at Mayton Wood were to close it is not expected that people would travel to Sheringham as an alternative site. The closest alternative sites to Mayton Wood are the recently opened site at Norwich North and Worstead Recycling Centre and furthermore, since the new site at Norwich North opened the usage of Mayton Wood has dropped by around 30%.
2. A second response highlighted the positive inclusion of a reuse shop. This was one of the key drivers to develop an improved site for Sheringham. There was a further comment that it would have been good to see waste oil collection on site, and we are able to confirm that waste cooking oil and waste engine oil are both collected on the current and proposed Sheringham Recycling Centres.
3. A third response was submitted [REDACTED]
This response raised several issues including the proposed road improvement, acoustic fencing and additional issues on speed limits and signage. These comments have been addressed elsewhere in this letter, including the proposal of additional acoustic fencing on the western boundary and significant additional planting. The transport assessment for the proposed recycling centre does not conclude that any speed reduction is required as part of the development based on the speeds surveyed as part of our studies.

If you require any additional information, please do not hesitate to get in touch.

Yours sincerely

[REDACTED]
Peter Barnes, Waste Infrastructure Manager

Encl.
Landscape and Visual Appraisal Addendum
Landscape Mitigation Plan Addendum

