

Planning Application New Sheringham Recycling Centre



Supporting Planning Statement January 2024 This Page is Intentionally Blank



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1 Scheme Summary

1.1 Norfolk County Council (the Council) provides recycling centres for the disposal of household waste under section 51 of the Environmental Protection Act 1990. The Council provides 19 recycling centres across the County, as shown on Figure 1. The Council is proposing to relocate an existing facility, Sheringham Recycling Centre, to a new site on land opposite the current location.



Figure 1 Norfolk's Recycling Centres

- 1.2 The new site is located on undeveloped land opposite the existing site and will be accessed off the A148 layby via a new, improved junction with the main road.
- 1.3 A new surface will be laid for the collection and temporary storage of household waste, with a small element of trade waste. In addition, a new site office and welfare facility for staff along with a reuse shop will be constructed.
- 1.4 The new recycling centre will be permitted to accept up to 6,000 tonnes of waste per year and will open seven days a week year-round, excluding Christmas Day, Boxing Day, and New Year's Day. The application seeks to allow for the opening hours of the new site for the public to be from 9am to 6pm (1 April – 30 September) and 9am to 5pm (1 October – 31 March), with access to service the site from 7am.



- 1.5 The public opening hours will be determined by Norfolk County Council within the permitted hours, currently set at 9am to 4pm, throughout the year.
- 1.6 The new facility will be provided by Norfolk County Council for the deposit of household waste by Norfolk residents. In addition, the site may accept small amounts of trade waste and construction and demolition waste. The site would operate under an Environmental Permit issued by the Environment Agency, which is subject to a separate application process.
- 1.7 A reuse shop will be located on the new recycling centre for the sale of items suitable for reuse. The reuse shop aims to divert material from disposal or recycling in line with the waste hierarchy.
- 1.8 In addition to the sale of reusable items, the Council may wish to sell other items associated with recycling and composting. This includes bagged soil improver (compost), compost bins, green waste sacks, Christmas trees and logs. These items would be linked to the lifecycle of products accepted at the recycling centre. For example, logs would be made from recycled timber such as that collected at recycling centres. This aligns with the principles of the 'Circular Economy.' The circular economy embraces the philosophy of keeping resources in use for as long as possible, extracting the maximum value from them whilst in use, then recovering and regenerating products, and materials at the end of each service life. The aim of the small-scale sale of items is to promote the recycling centre service and bring a small income to the County Council to offset the cost of running the service.
- 1.9 An Environmental Impact Assessment (EIA) screening request for the scheme was submitted to Norfolk County Council's planning services in March 2022. The Council issued a screening opinion on 24 March 2022, reference SCR/2022/0003, which concluded that an Environmental Impact Assessment was not required for the application.



2 The Site

Site Location and Description

2.1 The site for the proposed Sheringham Recycling Centre is on land off the A148, located within the parish of Beeston Regis, in the district of North Norfolk as shown on Figure 2. The existing site is located within the parish of East Beckham.



Figure 2 Location of Sheringham Recycling Centre showing District and Parish Boundaries

The site is bounded to the South by the A148 layby, to the East and North by fields and to the West by a bunded concrete pad.

Designations and policy summary

2.2 The site is currently arable farmland. There are some small, scattered trees present around the southern and eastern edges of the field. The surroundings largely consist of arable fields. There is a bunded concrete pad immediately west of the site and the existing Recycling Centre to the south-west. There is a small area of woodland opposite the site, adjacent to the existing Recycling Centre, which provides screening from the A148. Woodland to the west and north provides visual screening with open views across the field to the east.



- 2.3 Hilltop Activity Centre is around 200m to the North-West of the site. The closest residential receptors are located off Britons Lane, approximately 300m north of the site.
- 2.4 The site is located within the Norfolk Coast Area of Outstanding Natural Beauty (AONB). The Historic Parks and Gardens at Sheringham Park and Felbrigg Hall are over 2.1 and 2.7km respectively. The closest listed building, Abbey Farmhouse (grade II) is some 1.2km southwest of the site.
- 2.5 The Proposed Development also includes an improvement to the junction with the A148 requiring realignment of the junction through land owned by Norfolk County Council. The junction realignment will improve visibility for vehicles exiting the layby in both directions. The old section of road to the east of the new junction will be reinstated to highway verge and extensive native tree planting leaving a small section to retain access to an existing field gate at the eastern end.
- 2.6 Upon completion of the construction of the proposed site, recycling centre operations will be relocated to the new area. The vacated existing site will have its infrastructure removed, and the area will be returned to natural woodland in line with its immediate surroundings.



3 Statement of Need

- 3.1 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 layby itself and visitors to the site often having parked outside and carried materials in.
- 3.2 At the Council's Environment, Development and Transport Committee on 9 November 2018, it was agreed that the Council would support a scheme being put forward to the capital programme for the expansion of the Sheringham Recycling Centre, and the scheme was awarded £1.65m funding in 2019.
- 3.3 The original proposal for the expansion of the existing Sheringham Recycling Centre was worked up into further detail, as shown in figure 3, but the constraints on access and particularly limitations on the existing junction with the A148 and ease of use for the public led to a search for an alternative site to develop a best practice facility on, which is further detailed in section 4.



Figure 3 Early concept work on the expansion of the existing Sheringham Recycling Centre



- 3.4 Expansion to the west was initially considered but found to be highly undesirable due to the number of mature trees that would have to be removed with no opportunity to recover this biodiversity loss within the concept sites design. The design did not also achieve the operational enhancements required due to the shape of the site.
- 3.5 Norfolk County Council has a number of policies 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, reuse, 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.
- 3.6 The 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.
- 3.7 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 and an expanded selection of materials collected for recycling on site.

4 Site Selection Process

- 4.1 Following the decision to assess alternative sites to the existing recycling centre, a robust site selection process was undertaken by NPS Property Consultants on behalf of Norfolk County Council.
- 4.2 The Council specification for replacement recycling centres is to provide a modern recycling centre that will promote reuse and recycling above disposal with an on-site reuse shop facility. The new site to replace Sheringham needs to be around 0.4 hectares in size in order to allow space for hardstanding, separate operational and public areas, drainage, site office, reuse shop and staff parking.
- 4.3 The search criteria used when assessing sites for a new recycling centre is set out as follows:



- Provide suitable access for public and service vehicles including HGVs and articulated lorries;
- Provide good road links to ensure any new site is well related to urban areas;
- Preference for any new waste site to be located on land already in waste management use (i.e. existing industrial/employment land, other previously developed land, or contaminated/derelict land); and
- For any site to be available for access 7 days a week.
- 4.4 Any identified site should also allow for:
 - Suitable concrete hard standing;
 - Appropriate treatment and drainage of surface water run-off to comply with environmental regulations;
 - Siting of buildings (e.g. welfare unit, office, and reuse shop);
 - Lighting, CCTV, automatic number plate recognition (ANPR), canopies or other required infrastructure;
 - Connection to existing services, such as foul sewage, water, electricity, and telephone line;
 - A separate entrance and exit where possible;
 - Segregation of public and operational areas; and Sufficient size to accommodate traffic within the site to reduce the likelihood of queuing on the highway.
- 4.5 Further assessment of the suitability of alternative sites and discussions with landowners led to a preferred site being identified, shown in figure 4. In January 2022, Norfolk County Council's Cabinet agreed to enter a lease for 0.4 hectares of land at Holt Road and subsequently, declare the Sheringham Recycling Centre site surplus to requirements subject to the replacement site being operational.





Figure 4 Extract from the Exhibition Boards showing the proposed location for the new Sheringham Recycling Centre

4.6 The timeline and actions relating to of the site search for a replacement for Sheringham Recycling Centre from project inception to submission of the planning application, are set out in detail in this table.

	Action	Timescale
1	Service review identified insufficient capacity of the Sheringham	September
	Recycling Centre to meet the future needs of the catchment area.	2015
	Further work to consider and advise on the replacement or	
	redevelopment of Sheringham Recycling Centre was approved by <u>EDT</u> Committee in September 2015.	
2	Options appraisal desk top study completed to assess the options available, this included remaining at the current site, the viability of an extension and moving to a new site.	November 2016
	Concept study undertaken by Utility Partnerships to provide a detailed assessment of options to extend the existing recycling centre. Consultation undertaken which raises issues with the proximity to the	
	main A148 Holt Road and location of access to the site.	
3	Initial search undertaken by Norfolk Property Services (NPS) of Council owned land, including contact with North Norfolk District Council, requesting potential suitable and available land to meet the needs set out in the site search criteria. NNDC's response was they did not have land within the area available.	Spring 2017
4	Site findings report from this search produced by NPS resulted in the two potential sites being identified that unfortunately were not considered suitable. Primarily due to location, surroundings, and traffic concerns, and therefore resulted in no suitable land in the area identified to date through this process.	June 2017



5	EDT Committee November 2018 approved putting the Sheringham Recycling Centre improvements forward to the capital programme,	November 2018
	which was approved by <u>Full Council</u> in February 2019.	2010
6	Further consideration is given to existing site extension and design. New concept investigation commences. Existing site extension ruled out again predominantly due to requiring the use of woodland and operational restrictions due to the shape and size of the available area. Entry point into proposed site did not comply with junction configuration proximity to the main road.	February 2019
7	 Instruction given to NPS to commence search for an alternative site, and enquiries made by NPS with 15 local land agents for property in the area. From that search three options were explored. 1) The quarry adjacent to the current site – however the landowner did not engage. 2) Land to the west of the current site (towards Holt) – discussion undertaken with the landowner but as previously identified, it was considered unsuitable as area is made up entirely of mature woodland. 3) Land proposed opposite the existing site for the new recycling centre identified in the current planning application FUL/2023/0005. 	Summer / autumn 2019
8	First meeting concerning proposed land with the landowner. (11 February 2020) Shortly after this meeting instruction given to Stantec to undertake a new concept review.	February 2020
9	Selection Criteria assessment completed highlighting superb location for new site to be constructed. The proposed site is located immediately opposite the existing Sheringham recycling centre. It retains in an excellent location off the A148 well suited for the residents of Cromer, Sheringham. and Holt. The new site be constructed whilst the current site continues to operate. Several concepts were investigated leading to the current design. Additional benefits of the proposed site are no residential homes nearby and being immediately adjacent to the existing Recycling Centre (which has always operated in reasonable harmony with its surroundings), the improvements proposed for the new site will reduce historic congestion issues outside of the site and blocking of the layby. It will improve access to Hilltops Activity Centre from the	December 2020
	 the layby. It will improve access to Hilitops Activity Centre from the east (Cromer direction) as there are dedicated off road parking spaces within the proposed site for staff, and unlike the existing site the proposed site will remain open to the public whilst containers are exchanged in a dedicated central yard, preventing site users waiting, and queuing on the highway. Users of the proposed site will have an enhanced experience especially if using trailers. This is due to the one-way system through the site, and 	



- 4.7 The planning application for a new replacement recycling centre will be determined against the Development Plan for the area, including:
 - Norfolk County Council Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010 – 2026 (CSDPD), adopted in September 2011;
 - Norfolk County Council Waste Site Specific Allocations Development Plan Document (DPD) (WSSADPD), adopted October 2013; and
 - North Norfolk Local Development Framework Core Strategy, September 2008.



5 Planning Policy Context

National Planning Policy Framework

- 5.1 The National Planning Policy Framework was published by the Department for Communities and Local Government in March 2012 and updated in July 2021. This document replaces many of the national planning policy statements although waste is dealt with through the National Planning Policy for Waste, published in October 2014. The NPPF reiterates that planning permission should be determined in accordance with the development plan (paragraph 2) and the relevant local plan.
- 5.2 One of the key policies underpinning the NPPF is that of sustainable development. This includes helping to build a strong, responsive, and competitive economy, support strong, vibrant, and healthy communities and contribute to protecting and enhancing our natural, built, and historic environment. Whilst the framework does not contain specific policies on waste, it does provide relevant guidance such as good design, meeting the challenge of climate change and conserving and enhancing the natural environment.
- 5.3 The National Planning Policy for Waste (October 2014) sets out detailed waste planning policies. It recognises the need to drive waste management up the waste hierarchy with a mix of types and scale of facilities.
- 5.4 Providing a larger, more modern facility for recycling in North Norfolk would enable the reuse and recycling offering to be improved and for more material streams to be appropriately recycled. To begin with, the new site will offer some additional waste streams for recycling that are currently not available at Sheringham recycling centre due to the size limits, such as flat glass and plasterboard.
- 5.5 The new site will enable a dedicated reuse facility to be operated on site. This will allow materials suitable for reuse to be removed from the waste stream and sold for reuse through the on-site shop. This includes items such as furniture, toys, and bicycles.
- 5.6 The sale of items on site not generated through on-site reuse activities would be selected to support and promote the aims of the recycling centre network. For example, compost sold on site is made from processed green waste, including that collected at our recycling centres. Logs, suitable for log burners, made of recycled timber could demonstrate the closed-loop of recycling linking with wood collected on site for recycling. It must be noted that due to limited storage space on site and the importance of providing a continued recycling centre service for Norfolk householders, sale of items would be on a small scale.

Minerals and Waste Planning Policy

5.7 The adopted Norfolk Minerals and Waste Development Framework contains the waste planning policy documents for use in making decisions on planning applications for waste



management facilities. The Core Strategy and Minerals and Waste Development Management Policies Development Plan Document 2010-2026 (CSDPD) was adopted in 2011. The following policies are particularly relevant to any new replacement recycling centre facility:

- Policy CS3: Waste management capacity to be provided.
- Policy CS5: General location of waste management facilities
- Policy CS6: General waste management considerations
- Policy CS13: Climate change and renewable energy generation
- Policy CS14: Environmental protection
- Policy CS15: Transport
- Policy DM1: Nature conservation
- Policy DM4: Flood risk
- Policy DM6: Household waste recycling centres
- Policy DM7: Safeguarding aerodromes
- Policy DM8: Design, local landscape, and townscape character
- Policy DM9: Archaeological sites
- Policy DM10: Transport
- Policy DM11: Sustainable construction and operations
- Policy DM12: Amenity
- Policy DM13: Air quality
- Policy DM16: Soils

North Norfolk Planning Policy

- 5.8 The proposed recycling centre is located within the district of North Norfolk. The current Core Strategy (2008) provides development policies for planning. A new core strategy is currently being prepared but has not yet been adopted. The following policies contained within the current core strategy are relevant to this application:
 - Policy SS12 Sheringham
 - Policy EN 1 Norfolk Coast Area of Outstanding Natural Beauty and The Broads
 - Policy EN 2 Protection and Enhancement of Landscape and Settlement Character
 - Policy EN 6 Sustainable Construction and Energy Efficiency
 - Policy EN 7 Renewable Energy
 - Policy EN 9 Biodiversity & Geology

Other Relevant Considerations

5.9 On 25 November 2019, the Council adopted an Environmental Policy reflecting the areas that the Council sees as key to protecting and maintaining the health of Norfolk's distinctive environment and its occupants. The Environmental Policy sets out several key policies as



outlined below:

- Using and managing land sustainably
- Recovering nature and enhancing the beauty of landscapes
- Connecting people with the environment to improve health and wellbeing.
- Increasing resource efficiency and reducing pollution and waste
- Securing clean, healthy, productive, and biologically diverse seas and oceans
- Protecting and improving our global environment.
- 5.10 A key objective of the proposed development is to improve reuse and recycling in Norfolk. This aligns with the Council's Environmental Policy aim to increase resource efficiency and reduce pollution and waste. The design and layout of the site have been considered to ensure that reuse is prominent, and that recycling is easily accessible to Norfolk residents.



6 Assessment against Planning Policy

6.1 The proposed development has been assessed within the policy context as outlined in section 5. The assessment is set out below and further detail can be found in the technical statements accompanying this planning application.

Principle of the Development

- 6.2 Policy CS5 of the CSDPD sets out the general locational preferences for waste management facilities (i.e. well related to the Norwich Policy Area/main settlements). Additionally, Policy CS6 sets out a clear hierarchy as to waste related activities (which includes recycling centres) and where these should be located. The preference is for land already in a waste management use or secondly for an existing industrial/employment land or land identified for these uses in a Local Plan or Development Plan document.
- 6.3 Following a site search for a replacement recycling centre in the Sheringham area, as outlined in Section 4, sites already in waste management use were not available or suitable for development. The proposed site is located on land not previously developed, policy DM 6 Household Waste Recycling Centres makes allowance for development on other sites including greenfield sites where a suitable site in line with Policies CS5 and CS6 cannot be found, where there is a demand for a new or improved Household Waste Recycling Centre. To compensate for the use of not previously developed land should this supplication be granted, the existing Recycling Centre will have infrastructure removed, and the area will be returned to native woodland which will be an enhancement on the low-grade agricultural lane used for the new development.
- 6.4 The proposed recycling centre will be permitted to accept up to 6,000 tonnes of waste per year from households and small amounts of trade waste. This would be in accordance with the waste management strategy for Norfolk and the aspirations of policy CS3 of the CSDPD to ensure sufficient capacity for waste management in Norfolk.

Design and Layout

6.5 The site layout plan demonstrates how the site could be successfully integrated into the built environment. The proposal is for a flat site with a segregated operational and public area. This will allow waste to be easily dropped off by the public and the site easily maintained by staff. Although the skips will be of a functional design and appearance, they would not have a detrimental impact upon the character and appearance of the site as they are located in the central area of the site and will be screened from adjoining land through landscaping, including along two sides a 'living' acoustic fence.





Visualisation 1 View of across the fields to the proposed site from the direction of Hilltops Activity Centre



Example of external side of living acoustic fencing





Internal side of living acoustic fencing



Components of the living acoustic fencing visible during construction





External side of living fence 4 weeks after installation



Living acoustic fencing 6 months after installation

- 6.6 The proposal also includes a single storey reuse shop building. The proposed size and scale of the building would respect the character and appearance of the area and would be compatible with the planned built form for the area in accordance with policy DM8 of the CSDPD.
- 6.7 The layout of the site has been subject to an iterative design process following discussions with key stakeholders, including Norfolk County Council highways. An early layout for the site, shown in figure 5, included a split-level site but constraints on space and deliverability meant the layout was adjusted to a flat site, which allowed for better parking and public access, shown in figure 6. Additional amendments to the layout were made following the public consultation run in July 2022, which are detailed further in the Statement of Community Involvement, including adjustments to the proposed bin layout and a greater area for reuse.
- 6.8 In view of the above, it is considered that the proposal addresses the key policy aspirations of NPPF and NPPW and policy DM8 of the CSDPD.





Figure 5 An early iteration of the site layout for Sheringham, showing a split-level site but with limited public accessibility. This was subsequently discounted due to space constraints.



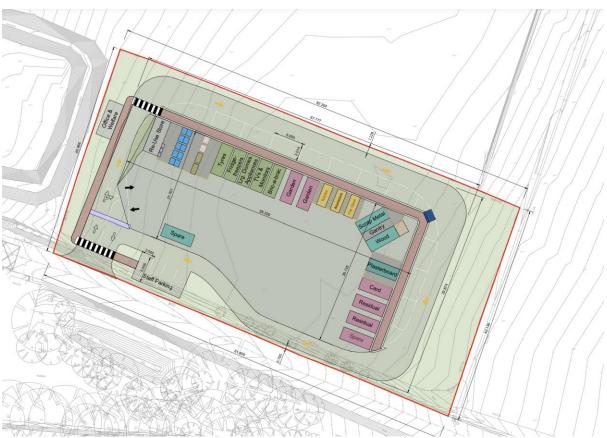


Figure 6 A later development of the layout showing a flat site with increased parking and improved traffic flow. The layout was further refined following public consultation.

Transport

- 6.9 The recycling centre will be accessed through the main entrance at the western end of the site. The public will drive straight ahead on arrival at the site, passing the entry to the operational area, and follow the road around the edge of the site parking in the designated bays. The road will then lead around to the entry/ exit point giving visitors the chance to recirculate the site should they need to.
- 6.10 On entry to the recycling centre, service vehicles will enter the central service yard where bins can be accessed for emptying and replacing as required. This area will not be accessed by the public to ensure that the site can continue to operate for the public whilst essential servicing is taking place.
- 6.11 The site provides 14 parking spaces, including four bays designated for staff parking, representing an increase of two parking spaces for visitors and four parking spaces for staff. The number of parking spaces is based upon projected demand and evidence from existing recycling centres and represents an increase in parking spaces from the existing site.
- 6.12 The site's accessibility by non-car modes of transport is limited. There are no existing footways connected to the site, and similarly there is no dedicated cycle infrastructure,



cyclists would be forced to share Holt Road with vehicular traffic. Holt Road is a single carriageway with a national speed limit (60 mph), making cycling to the site undesirable.

Ecology

- 6.13 Policy CS14 of the CSDPD outlines the importance of the protection and enhancement of Norfolk's natural and built environments. It states that 'In particular, developments must ensure that there are no unacceptable adverse impacts on, and ideally improvements to ... biodiversity.' Policy DM10 then goes on to state that where developments cause harm to nature conservation, they will only be permitted where suitable mitigation to minimise the harm can be put in place.
- 6.14 A Preliminary Ecological Appraisal (PEA) of the site has been prepared by Geosphere Environmental. It describes the existing site area in two sections, one being the recycling centre proposed site and the other describing the area impacted by the new junction.
- 6.15 The northern parcel (the recycling centre land) forms part of an arable field which has been left fallow with rare occurrences of Mugwort, Broad-leaved Dock, Brambles, and Butterfly Bush. It is surrounded by arable fields with other cereal crops to the north and west and modified grassland to the east. The southern section comprises a small patch of grass with Toadflax, Yorkshire Fog, and Common Nettle; A section of woodland including field maple, ash and pedunculate oak; and some dense scrub, with Bramble the dominant species. A hedgerow along the eastern boundary of the site is fairly young and recently planted.
- 6.16 The PEA concludes that the proposed development will not adversely affect any statutory or non-statutory designated nature conservation sites. None of the habitats that occur within the survey area were considered to have high ecological importance on an international, national, regional, or county scale. The habitats onsite are of local significance only and no additional surveys are required.
- 6.17 Whilst the opportunities for biodiversity enhancement are limited within the footprint of the recycling centre, the removal of the existing tarmac road surface and proposed planting of native woodland trees in the redundant section of the existing eastern end of the layby have considerable biodiversity enhancement effects. Geosphere Environmental has prepared a supplementary note proposing ecological improvements to achieve biodiversity net gain from surface area of the development alone of 46.18%.
- 6.18 Returning the existing recycling centre site to native woodland should this application be granted will add a further considerable net gain to biodiversity in the immediate area, more than compensating for use of low-grade agricultural land.



This supports the Council's Environmental Policy to embed environmental net gain into development.

6.19 It is considered that based on the findings of the PEA and the proposed mitigation outlined in the biodiversity enhancement supplement, the development would be in accordance with policies CS14 and DM1 of the CSDPD.

Flood Risk and Drainage

- 6.20 A Flood Risk Assessment (FRA) has been prepared by Stantec to support the planning application. The site is located within Flood Zone 1, having a less than 1 in 1000 annual probability (0.1%) of river flooding. It has been assessed to be at low risk from other sources of flooding including surface water, groundwater, and sewers.
- 6.21 The proposed surface water drainage strategy splits the site into the lower risk car park and public roadway and the higher pollution risk service yard area. The proposed surface water treatment systems have been assessed using the Simple Index Approach, as per the 'SuDS Manual,' specifically in response to comments from Norfolk Country Council, as Lead Local Flood Authority. It provides adequate surface water treatment for the expected pollution hazards for the proposed development based on the Simple Index Approach, further detail is provided within the accompanying Flood Risk Assessment and Surface Water Strategy.
- 6.22 The FRA confirms that the development is safe, it does not increase flood risk and does not detrimentally affect third parties, in accordance with the objectives of the NPPF and the requirements of national and local planning policy. The proposal therefore complies with the National Planning Policy Framework (NPPF), planning policy DM3 and DM4 of the CSDPD and North Norfolk Local Development Framework Core Strategy policy EN10.

Noise

- 6.23 The National Planning Policy Framework (NPPF) was updated in July 2021. It does not set out numerical criteria for noise affecting proposed developments, but states that planning policies and decisions should actively contribute to the enhancement of the natural and local environment and also ensure new development is appropriate for its location, particularly considering the likely effects on health and living conditions.
- 6.24 Policy CS14 'Environmental Protection' and DM12 'Amenity' of the CSDPD relate to the noise impact of new development. Whilst no guidance is given regarding specific assessment methodology and/or criteria, the planning policy requires that new waste management facilities do not adversely and unacceptably affect local amenity.
- 6.25 The accompanying noise report details the assessment and methodology undertaken to establish the impact of noise on the site. It concludes that the prevailing noise environment in the vicinity of a proposed recycling centre is predominantly characterised by road traffic noise (mainly from the A148 to the south). Other sources of ambient noise include noise



from the existing recycling centre on Holt Road, natural sounds (e.g. birdsong), sounds associated with Hilltop Outdoor Centre, and at the time of the survey industrial noise on a field to the north of the site (unrelated to the recycling centre).

6.26 Construction noise associated with the proposed development was predicted and assessed with no significant effects likely. Operational noise from associated off-site traffic was shown to have a negligible impact and operational noise from on-site activity was assessed to have a low impact. Mitigation has been included in the form of a living acoustic fence along the northern boundary. Overall, the noise assessment concludes that the proposed development would comply with the requirements of Policy CS14 and DM12 of the CSDPD.

Additional living acoustic fencing has been added along the western boundary as a courtesy in response to concerns raised by Hilltops Activity Centre.

Landscape

- 6.27 The Site falls within the Norfolk Coast Area of Outstanding Natural Beauty (AONB). Allocated from part of an arable field on agricultural land supporting cereal crop and bramble scrub, the Site has no existing boundary or on-Site features. To the north, the Site has an open boundary with the remaining part of the agricultural field, with the land beyond being an area of woodland forming part of Old Wood. To the south, the Site is bounded by the Old Holt Road and defined by the remnant shrubs of a defunct hedgerow. The land beyond to the south side of the Old Holt Road, supports an area of young plantation woodland with a margin of scrub and bramble. To the east, the Site is bounded by a hawthorn hedgerow, maintained at an approximate height of 1m at the time of the Site survey and fieldwork. To the west, the site is bounded by a former agricultural sugar beet storage and loading pad which is surrounded by an overgrown, approximately 2.5m high earth bund. Beyond this to another bunded area with high hedging, leading to a wider expanse of interconnecting woodland blocks, including Old Wood, Sheringham Wood and Pretty Corner Woods.
- 6.28 The landscape and visual appraisal conclude that the effect on the landscape receptors would be moderate adverse at year 1 reducing to moderate-minor adverse at year 15. It is expected that the landscape effects resulting from the development would be limited to areas in close proximity. Likewise, for visual receptors where the Development is visible, there may be a moderate adverse impact reducing to minor beneficial impact with the embedded mitigation proposed (see Visualisation 2 view from Britons Lane / Holt Rd junction year 1, and photograph of the existing view from the Britons lanes junction.





Current view from Brittons Lane junction looking towards the proposed site.



Digital Visualisation 2 towards the proposed new recycling centre from Britons Lane Junction with Holt Rd YR1





Existing View from Britons Lane at the end of the bridleway looking towards the existing Recycling Centre with the proposed new Recycling Centre



Digital Visualisation of proposed recycling centre from Britons Lane

6.29 It is considered that the immediate context to the site is capable of some change due to the wide mix of woodland types that form the 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 landscape to an acceptable level in planning terms.



Utilities

6.30 A Utilities Statement has been prepared by Stantec in support of the planning application. The recycling centre will require power, water, and telecoms to support day to day operations, including lighting, heating, IT connections and staff welfare. Enquiries have been made with the relevant providers. There is sufficient capacity in the network to provide an electricity supply to site. The water supply, including fire water supply, can be met through a connection to the Anglian Water network.

Sustainability

- 6.31 A Sustainability Statement has been prepared by Envision to demonstrate how the scheme would meet with Norfolk County Council sustainability policies held within the CSDPD and summarises the strategic benefits of the scheme in terms of sustainability.
- 6.32 The proposed development will assist Norfolk County Council to divert increasing proportions of waste from landfill, thus working in accordance with the established waste hierarchy and Government's resources and waste strategy (2018). Additionally, the development supports policies within the CSDPD, notably policy CS13 through provision of PV panels to meet at least 10% of the site's energy demand, provision of efficient lighting and cabins, sustainable drainage and pollution control measures and landscape enhancements. The Sustainability Statement concludes that the scheme is being brought forward in accordance with adopted sustainability policies.

Net Zero Carbon

- 6.33 In addition to the sustainability policies, consideration has been given as to how the proposed development can contribute towards the County Council's net zero carbon policies. NCC waste services has carried out a carbon assessment of the recycling centre service, including the impact of the construction of new sites.
- 6.34 Where an existing site is being replaced, carbon savings can be achieved through increased efficiency, for example if the recycling rate is expected to go from 65% to 75%, an additional c. 280 tonnes of material could be diverted from landfill or incineration (based on average tonnage of 2,820 tonnes handled at all sites). If half of this extra tonnage is additionally incinerated instead of landfilled, and the other half is additionally recycled, average recycling and diversion from landfill benefits are -169,200 kg CO2-eq and -9,800 kg CO2-eq respectively. Based on estimations of the carbon emissions associated with the construction of a new recycling centre, it would take approximately 2.5 years of operation at the new site to offset the carbon impacts of building the new facility.
- 6.35 The replacement Sheringham Recycling Centre will contribute towards net zero by providing additional opportunities for segregating material for recycling as well as provision of an onsite reuse shop. More local benefits are also expected, including reduction in



queueing traffic due to a smoother flow of traffic through the site and the removal of the need to close the site for servicing meaning that service vehicles will not have to stand idle outside the site waiting for the public to vacate before servicing containers, and public vehicles will not be waiting outside the site for it to reopen whilst running car engines.

7 Responses to Initial consultation

7.1 Following submission of the planning application and initial consultation, the applicant received a set of comments. In this section are 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).
- 7.2 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.

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.'

7.3 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).



- 7.4 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 19 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.
- 7.5 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.
- 7.6 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.
- 7.7 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.
- 7.8 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.
- 7.9 Given the extent of the AONB in the area, there was limited scope to site the recycling centre outside of the Area, 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 this Planning Statement, 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 extremely 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.

7.10 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.

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

- 7.11 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.
- 7.12 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.
- 7.13 The proposed development contains sustainability measures to reduce its impact on the local environment. These include:
 - Onsite treatment of surface water through sustainable drainage.
 - No external lighting.
 - Onsite and offsite planting to soften the visual appearance of the site.
 - Rain garden which utilises rainwater from the roofs of the buildings.
 - Living acoustic fencing to the Northern and Western boundaries.
 - Renewable energy generation to support the operations of the recycling centre.
 - Should the proposed application receive approval the existing recycling centre site will have the current infrastructure removed, and the site will be returned to its natural woodland environment.
- 7.14 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.



- 7.15 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.
- 7.16 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.
- 7.17 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.
- 7.18 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 document.
- 7.19 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.
- 7.20 The development of the recycling centre has been kept low level with single storey buildings, and mitigation through extensive planting. Additionally, boundary fences are proposed to be black chain-link to soften their appearance. Living acoustic fencing will be installed to the western and northern boundaries. Overall, it is considered that the location and scale of the proposed development is appropriate and does not conflict with policy EN2.

Site Selection

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



- 7.21 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.
- 7.22 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.
- 7.23 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.
- 7.24 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.
- 7.25 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.
- 7.26 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.
- 7.27 The Arboricultural Impact Assessment submitted with the planning application shows that 11 very small 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 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.
- 7.28 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 redundant section of carriageway being taken up, further details of this are outlined in point 4 below.

- 7.29 Providing this application is successful the existing recycling centre site when vacated, will have its current infrastructure removed and be returned to natural woodland.
 - 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.
- 7.30 The Preliminary Ecological Appraisal and Biodiversity Net Gain Feasibility reports have been updated to account for the subsequent additional planting that has recently been proposed by the applicant in the old section of carriageway.
 - 3. Recommend species-based features.
- 7.31 This aspect has been addressed alongside the updated Preliminary Ecological Appraisal and Biodiversity Net Gain Feasibility reports.
 - 4. Further details to demonstrate the habitat creation is feasible in the area of removed redundant carriageway.
- 7.32 An addendum to the Landscape and Visual Appraisal and Landscape Mitigation Plan 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, with 1m³ tree pits dug and backfilled with topsoil being located to avoid underground utilities. Tree species suitable for this shallow area have been selected and are detailed in the updated Preliminary Ecological Appraisal and Biodiversity Net Gain Feasibility reports.
 - 5. Condition a Landscape and Ecological Management Plan.
- 7.33 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.
- 7.34 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.
- 7.35 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.
 - 8. Suggested ecology conditions by the District Council Ecologist.
- 7.36 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.
- 7.37 In addition to the points above, the applicant is proposing to amend the chain link fence to black chain link fence to reduce its visual impact.

<u>Noise</u>

- 1. Reduction in the permitted construction hours to 08:00 18:00 Monday to Friday and 08:00 13:00 on Saturday.
- 7.38 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.
- 7.39 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.
- 7.40 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. Additional acoustic fencing has been added to the western boundary in addition to the assessment requirements as a courtesy measure in recognitions of the concerns see point 3 below.
 - 3. Suggest inclusion of a 2.5 metre noise barrier to the west boundary.



7.41 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 living acoustic fence along the western boundary to provide additional noise attenuation above that which is considered necessary. Although any noise created on the recycling centre will be minimal, living acoustic fencing will be installed along the northern and western boundaries in additional consideration of the neighbouring activity centre. As this living fence grows it will completely cover the security fencing in those elevations as shown in the attached example.

<u>Lighting</u>

- 7.42 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.
- 7.43 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.
- 7.44 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.
- 7.45 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.

<u>Highways</u>

- 1. Details on a formal TRO to ensure the western access onto the A148 is an in-only junction and is considered essential.
- 7.46 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.
- 7.47 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.

- 7.48 Following the opening of the proposed new Recycling Centre, the existing site will be permanently closed, and the environmental permit surrendered. The existing site infrastructure will be removed, and the land will be returned to natural environment (native woodland) in line with its surroundings.
 - 3. Concerns raised regarding the traffic management of vehicles leaving the site and issues with the proposed T-junction.
- 7.49 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.
- 7.50 Turning right (west towards Holt) will be much easier and safer from the new junction than the existing western end of the layby due to serious visibility issues to the left. The signage directing traffic leaving the site to turn left is at the immediate exit from the site in the layby, and not the main A148 road. It is unlikely that traffic wishing to turn right at the main junction towards Holt direction will turn left and use Brittons Lane as a way of heading west.

Historic Environment

7.51 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

- 7.52 Three responses from individuals were published at the time of writing this response:
 - Concern was raised at the time about the potential closure of Mayton Wood Recycling Centre and the distance to travel to the proposed new Sheringham Recycling Centre. This decision has now been made and Mayton Wood closed at the end of November 2023 and the operations were moved to Norwich North Recycling Centre. The closure of Mayton Wood Recycling Centre is not linked to the proposed new Sheringham Recycling



Centre. It was put forward as part of the County Council's wider budget saving proposals and it is not expected that people travel to Sheringham as an alternative site. The closest alternative sites to Mayton Wood are Norwich North and Worstead Recycling Centres.

- 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 by the neighbouring business, Hilltop Activity Centre. 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 document, including the proposal of additional living acoustic fencing on the western boundary and significant additional planting. Dialogue with the owners of Hilltop Activity Centre has continued since the original application was made in March 2023, both directly and through requests made through the Freedom of Information processes.
- 7.53 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.

8 Conclusion

- 8.1 The recycling centre is well located to serve the needs of North Norfolk residents to replace the existing Sheringham Recycling Centre.
- 8.2 Whilst the proposed site is located on land not currently in waste management or industrial usage, assessment has shown that the design and layout of the recycling centre will respect the character and appearance of the area without harm to the amenity of neighbouring properties. The proposal would, therefore, comply with policies in the adopted Waste Local Plan, North Norfolk Local Plan, and government guidance in the NPPF and NPPW.