

# Sheringham Recycling Centre: Planning Statement Addendum addressing paragraphs 182 &183 of the NPPF (2023)

## Introduction

Both the current and proposed Sheringham recycling centre sit on opposite sides of the same piece of road off the A148 and both within the North Norfolk Area of Outstanding Natural Beauty (AONB). The National Planning Policy Framework (NPPF) 2023 states that great weight should be given to conserving and enhancing landscape and scenic beauty of an AONB. To grant approval, the development must be in the public interest and consideration is required for the need, cost, and any effect on the environment. Paragraphs 182 and 183 of the NPPF 2023 can be viewed [here](#).

The design for the new Sheringham Recycling Centre has kept any impact on the surroundings within the North Norfolk AONB, at the heart of the proposals both in the early stages of concept and design and in response to local feedback through the consultation processes.

## Consideration of options for a new development

### Early concept designs: site extension

Early concept designs were to extend the current recycling centre to the immediate east or west of the site. This early concept required mature woodland to be removed, covering the entire area of the extension. There was no opportunity available for sustainable drainage systems, nor to recover the huge biodiversity loss within the design.

The concept also resulted in much reduced natural screening so the site would be visible to passersby from both directions of the main A148 with potential safety consequences of the site being approximately two metres from the A148 along a large part of the southern boundary.

The early concept designs did not also achieve the operational enhancements required due to the shape of the adjacent land and would not permit an improvement to the junction with the A148 as would be required by highways safety team for any development in the layby area.



Figure 1 Early concept design for extension.

## Alternative site search

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Land searches for local authority owned land in the area were initially undertaken in 2017. The searches did not produce any suitable potential locations that were not extensively overlooked in the wide scenic views North Norfolk is famous for.

After revisiting extension concepts to the existing site, further commercial land searches took place in 2019 which identified the availability of land immediately opposite the existing site.

As the current Sheringham recycling centre has largely existed in harmony with its surroundings and neighbours, is in a location that does not cause additional congestion in the local town centres, and considering there were no other suitable sites identified in either land searches, the council proceeded to undertake soil condition investigations and preliminary design work for this site.

The soil investigations proved that the agricultural topsoil's between 250mm and 300mm in depth were classified moderate/low quality to very poor quality. The soil report indicated a classification across the site of between Subgrade 3b and Grade 5. Explanation of the soil's grades below.

*Subgrade 3b - moderate quality agricultural land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year.*

*Grade 5 - very poor-quality agricultural land with very severe limitations which restrict use to permanent pasture or rough grazing, except for occasional pioneer forage crops.*

Therefore, the proposed site would not be utilising an area of high-quality agricultural land.

### **Conserving and enhancing the landscape and natural environment.**

It should be noted that proposed location is obscured from panoramic views for the public from the north, west and south by private fields and mature woodland. There are also hedgerows in adjacent fields which interrupt the views of the proposed site location from closer view.

The proposed site location is not visible from the A148 Cromer / Holt Road if traveling west to east in the direction of Cromer, as it is completely shielded by existing woodland.

There are restricted and transient public views towards the location and adjacent fields from the east only if an individual is looking west from the A148 and Britons Lane.

These views are not panoramic views as in most of the North Norfolk ANOB due the area being surrounded on three sides by woodland. The view towards the proposed site is currently broken up by several existing hedgerows, and pockets of existing trees between the highways and the proposed location.

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Figure 148 Proposed location behind existing hedgerows and trees along the carriageway.

### Landscaping

Additional to the above, the applicant intends to screen the entire site from view by hedging and the living acoustic fencing to the west and the north detailed in the landscape plan. This giving the effect of a tall thick hedgerow which will grow through and above the security fencing rendering it effectively invisible in both winter and summer. Unwanted spread of the hedgerow will be managed by root barriers and regular maintenance.



Figure 2 Example of Living Acoustic fencing in leaf, and again in winter.

Taking account local concerns, further redesign of the landscaping plan includes an additional screening hedge to the east boundary and incorporating evergreen species at varying heights inside the site. Substantial planting of a similar species and a mix of heights in the redundant layby areas, will add to the screening measures of the site itself from the A148, with the considerable biodiversity net gain the project achieves.

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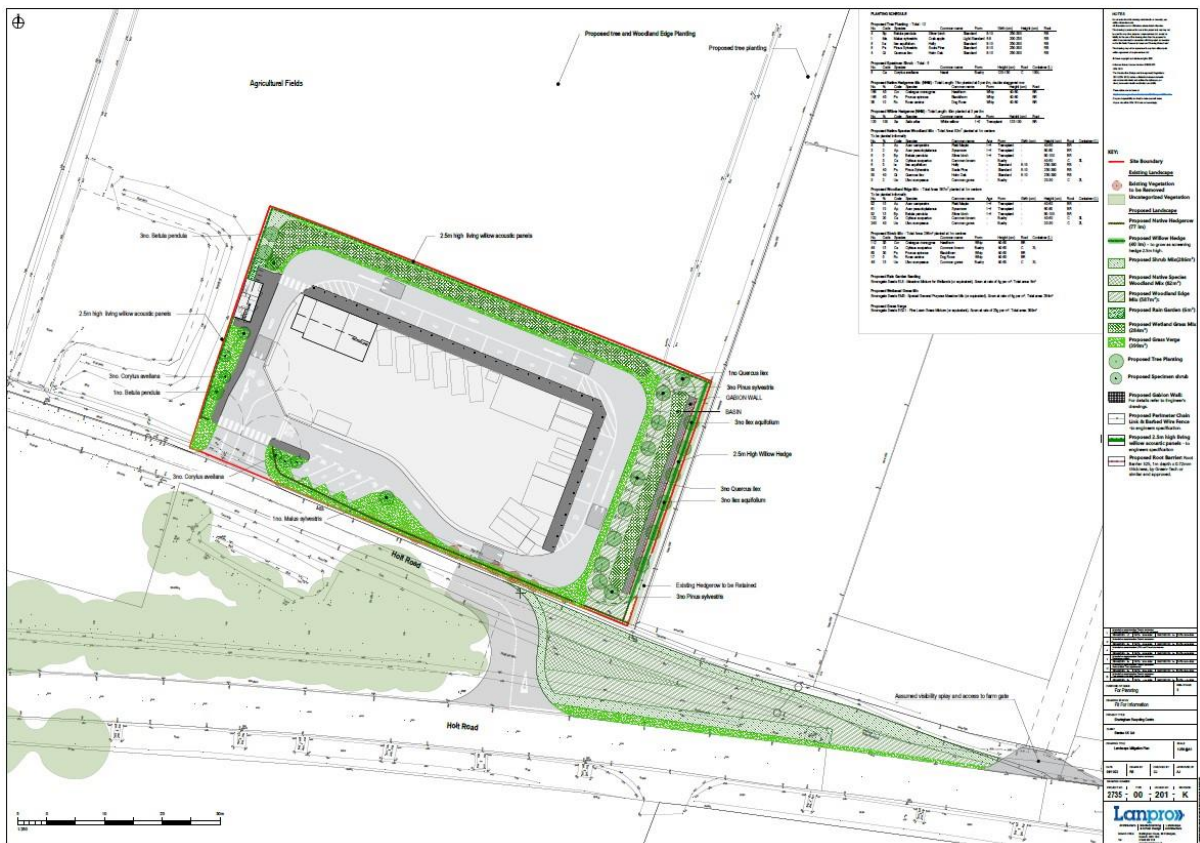


Figure 3 LMP Revision L

In addition to these screening measures, should permission be granted, the infrastructure of the existing recycling centre (which also is within the AONB) will be completely removed and the site returned to its natural and immediately surrounding environment of native woodland and further increase the biodiversity net gain of the main project.

### **Visual and acoustic considerations**

With the addition of the electrically powered roller compaction machine for the timber container, the compaction equipment to be used on the new site is identical to that used on the existing site which has no additional acoustic measures. However, in addressing concerns raised by our neighbours, and as a courtesy to the Hilltop Activity centre we have added additional noise reduction measures to that which are advised by the development's acoustic assessment.

The site does not have security or operational lighting which could negatively impact the surrounding area or biodiversity. CCTV security cameras have infra-red night vision.

In addition to the restricted views of the site possible as mentioned above, any remaining views from the east are broken up by existing hedgerows and clumps of trees within the surrounding fields, and along the verge of the A148. This restricted view will be substantially increased when the redundant section of lay by (currently the eastern layby access) is planted and matured.

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### **Requirement for a new recycling centre and public interest**

Due to the nature of this mostly rural, coastal area, within the boundaries of the North Norfolk AONB, there is understandably not much potential locally for suitable development land.

The applicant would not have anticipated planning consent to be granted at this location, or elsewhere within an AONB, had there not been an existing recycling centre operation immediately adjacent to the proposed location for many years.

The development at this location provides a much needed, improved public amenity. It is not in an area with panoramic views found in more widely visible areas of the North Norfolk AONB.

Should the permission be granted for this development the current recycling centre land will have its infrastructure removed and will be returned to native woodland, providing a biodiversity enhancement.

Along with the additional and revised planting scheme within the proposed site, the new planting in the redundant layby, will effectively be a swap of low-grade agricultural land and tarmac road, for prime woodland environment and the enhanced biodiversity with the environmental benefits that development would bring to the immediate area.

The proposed site allows more efficient, environmentally friendly, and cost-effective reception, storage, and transportation of residual waste and recycling materials to re-processors and disposal points with an increased number of larger containers with compaction facilities. This results in fewer HGV vehicle movements on Norfolk roads.

Notwithstanding with the proposed location within the North Norfolk ANOB, it can be considered to be an exceptional circumstance. The location is immediately next to the existing recycling centre, which will be vacated and turned into woodland. The proposed sites immediate backdrop and surroundings, and the restricted viewing possibilities from 3 sides considerably reduce overview compared with other vistas within the AONB. The landscape mitigation proposals detailed ensures the development has minimal negative visual impact on its surroundings. The proposal has positive gain in biodiversity and amenity, and therefore should be considered a suitable location for improvements in the recycling centre provision for the residents of North Norfolk.

### **Financial Commitment**

The Sheringham recycling centre improvement process has been ongoing since its need was identified in 2015. As we discovered by the nature of the location, land within the North Norfolk suitable for a new commercial development with the requirements of a modern recycling centre in the area is in very short supply. Considerable effort and expense from public funds have been already dedicated to the planning and acceptance process for improvement of the recycling centre provision.

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&183 of the NPPF (2023)**

Should the application not be granted, there would be a considerably reduced budget remaining to allocate any future consideration for Recycling Centre upgrades or improvements for the area.

**Alternative Site**

There has been much attention raised concerning an alternative site in Stonehill Way Cromer, previously occupied by Carter Concrete. The advised site was not identified as available when the land searches were carried out.

The currently proposed site was the applicants only option from the commencement of soil investigation to the time of submission of the current application, and beyond.

The applicant is therefore committed to the existing planning application submitted in February 2023. The alternative the site in Stonehill Way was advised to the applicant six months after the planning application was made. As the applicant (NCC waste), would have been negligent in the duties for public funds if the existing application had abandoned in favour of recommencing the process for an alternative site of unknown status.

Notwithstanding this and accepting the Stonehill Way site, on the edge of the AONB is larger than required, the site overlooks the retail estate and residential properties and onto Cromer town centre itself. The site can be seen for a considerable distance. It would bring traffic from a more rural location recycling centre into the centre of Cromer, which especially in peak summer months would be extremely undesirable. It is also understood considerable targeted site investigation works would be required before development as there is visible subsidence across the site, especially to the right-hand side of the entrance gate. It is in a highly exposed location on the hilltop overlooking Cromer town centre. The site will be susceptible to considerable exposure to winter winds from the North, Northeast, East and Northwest, making for a potentially unpleasant location for site users and staff during the winter, in periods of poor weather.