

***Planning Statement
Variation of Condition 10 (tonnage) and
Condition 6 (Highways) of Planning Permission
APP/15/00757***

**Farlington Redoubt, Portsdown Hill Road, Havant,
Hampshire, PO6 1BW**

Prepared by

INTEGRATED SKILLS LIMITED

For

L&S Waste Management Limited

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1. INTRODUCTION

- 1.1 This document provides the Planning Statement to accompany a planning application to vary Condition 10 of planning permission APP/15/00757 to increase the quantity of waste that can be handled at the site from 150,000 tonnes per annum to 190,000 tonnes per annum.
- 1.2 It also seeks to vary condition 6 of the consent to increase the lorry movements to and from the site from 230 per day to 292 per day.
- 1.3 All other aspects of the operation will remain as per the current consent.
- 1.4 The operation continues to be regulated by the Environment Agency. In July 2023, the Environment Agency approved a variation to the Environmental Permit, increasing the permitted tonnage to 190,000 tonnes.
- 1.5 This application seeks permission to consolidate the two consents with the same annual throughput.
- 1.6 The ability to manage more waste at this site has been achieved following recent investment and upgrading older plant and machinery. The new processing equipment is more efficient allowing more waste to be handled without increasing the environmental risk.

Design and Access Statement

- 1.7 A Design and Access Statement is not required for this application.

2. THE SITE

Location

- 2.1 The site is located at Farlington Redoubt, Portsdown Hill Road, Havant, Hampshire, PO6 1BW, at NGR SU686 065.

Access

- 2.2 The access to the site is via Portsdown Hill Road only. This joins the to the main motorway network via College Road and Purbrook Way, accessing the A3(M) and M27 motorways. This is the preferred route for all vehicles entering and exiting the site with the exception of local delivery vehicles and employees.
- 2.3 The routing of vehicles is controlled by Condition 20 of the planning consent. Appropriate signs are maintained by the operator informing drivers of the agreement.
- 2.4 There will be no changes to the access or routing to / from the site.

Planning History

- 2.5 Planning permission 01/54301/007 was granted by Hampshire County Council (HCC) on 29 November 2001. This was for the operation of a waste transfer station. This was time limited until 31 December 2003. A subsequent application was submitted to allow the operations to continue on a permanent basis which was granted consent in 2003 (ref 03/54301/009). At the same time, planning permission was granted for the storage and processing of secondary aggregates and soils, skip storage and vehicle parking in the northern part of the site.
- 2.6 Planning permission 05/54301/013 was granted on 1 December 2005 to continue concrete crushing operations at the site previously permitted on 29 July 2004 (ref 04/54301/012).
- 2.7 In February 2006, planning permission was granted to allow waste to be brought to the site by Registered Waste Carriers and covers the whole of the site and operations (ref 05/54301/014).
- 2.8 In January 2010, planning permission was granted to vary condition 9 of consent 05/54301/014 to increase the amount of waste handled at the site from 50,000 tonnes per annum to 80,000 tonnes per annum.
- 2.9 In May 2011 planning permission was granted for minor modifications to the existing waste recycling facility and the installation of a cement silo (ref 10/00141).
- 2.10 In September 2015, planning permission was granted to change the annual throughput from 80,000 tonnes per annum to 150,000 tonnes per annum (Ref 15/00757).

Environmental Permit

- 2.11 The Environmental Permit was originally issued in April 2002. It has had several minor variations, including increasing the annual throughput to 150,000 in line with the planning permission.

- 2.12 In July 2023, the Environmental Permit was varied to allow up to 190,000 tonnes of waste to be handled each year.

3. ENVIRONMENTAL SETTING

Geology

- 3.1 The site is underlain by the Upper and Middle Chalk. With reference to British Geological Survey Sheet 316, the site is located on Portsdown Chalk which consists of white chalk with flints and many thin marl beds. This is underlain by Spetisbury Chalk, containing white chalk with flints.

Hydrogeology

- 3.2 The underlying geology is designated as a Principle Aquifer. The site is not located within a Groundwater Source Protection Zone.

Hydrology

- 3.3 The nearest surface water to the site is Langstone Harbour, which is approximately 1500m to the south east of the site. The site is located within Flood Risk Zone 1, which has the least probability of flooding.

Ecology

- 3.4 There are no designated sites of international or national ecological importance within or adjacent to the site. The grass verges and embankments on Portsdown Hill Road to the south of the site are designated as a Site of Importance for Nature Conservation (SINC).

Archaeology and Historic Environment

- 3.5 Fort Purbeck is a Scheduled Monument and is situated over 500m to the west of the site.

Public Rights-of-way

- 3.6 The application does not affect any public rights of way and is not subject to any formal landscape designations.

Residential Property

- 3.7 The nearest residential property is approximately 140m from the site access on Portsdown Hill Road.

4. PROPOSED DEVELOPMENT

- 4.1 The site has been operated by the applicant as a waste transfer station since 2001. As set out in Chapter 2 there have been a number of planning permissions granted to reflect changes in the operation which are primarily driven by changes in waste management legislation and behavioural changes to increase the amount of waste recycled.
- 4.2 The proposed development seeks to increase the permitted throughput from 150,000 tonnes per annum to 190,000 tonnes per annum, to match the Environmental Permit.
- 4.3 The current planning consent permits up to 230 lorry movements per day (Condition 6). The additional 40,000 tonnes of waste will be delivered in a range of vehicles including skips, ro-ro containers, tipper lorries and vans. This will require an increase in the daily lorry allowance to 292 per day. A Transport Statement has been prepared to assess the impact of this change on the local highway network.
- 4.4 The Transport Statement confirms that the proposed increase in the number of lorries across the working day will not have a detrimental effect on the local network.
- 4.5 In late 2022/2023, L&S invested in the site, replacing old processing equipment with new modern machinery. This has improved the efficiency of waste sorting at the site, allowing the waste to be processed more efficiently.
- 4.6 Whilst the annual throughput will increase, the storage limits on the site will remain the same.
- 4.7 L&S has a good compliance rating with the Environment Agency and continues to provide a valuable and reputable services in this part of Hampshire. The site will continue to be managed in the same manner as per the current consent and no other changes are proposed.

5. PLANNING POLICY

Hampshire Minerals & Waste Local Plan (HMWLP)

- 5.1 This provides the strategic policy for waste management for the period up to 2030.
- 5.2 Policy 1 sets out the requirements for taking a positive approach to minerals and waste development that reflects the presumption in favour of sustainable waste development.
- 5.3 Policy 2 requires minerals and waste development to minimise their impact on the causes of climate change. This includes being located and designed to help reduce greenhouse gas emissions and avoiding areas of vulnerability to climate change and flood risk.
- 5.4 Policy 3 protects habitats and species.
- 5.5 Policy 4 protects designated landscapes.
- 5.6 Policy 5 protects the countryside.
- 5.7 Policy 7 conserved the historic environment and heritage assets.
- 5.8 Policy 8 protects soils, particularly the best and most versatile agricultural land.
- 5.9 Policy 9 requires restoration of minerals and waste developments.
- 5.10 Policy 10 relates to protecting public health, safety and amenity. Specifically, minerals and waste development should not
 - a. release emissions to the atmosphere, land or water (above appropriate standards);
 - b. have an unacceptable impact on human health;
 - c. cause unacceptable noise, dust, lighting, vibration or odour;
 - d. have an unacceptable visual impact;
 - e. potentially endanger aircraft from bird strike and structures;
 - f. cause an unacceptable impact on public safety safeguarding zones;
 - g. cause an unacceptable impact on:
 - i. tip and quarry slope stability; or
 - ii. differential settlement of quarry backfill and landfill; or
 - iii. subsidence and migration of contaminants;
 - h. cause an unacceptable impact on coastal, surface or groundwaters;
 - i. cause an unacceptable impact on public strategic infrastructure;
 - j. cause an unacceptable cumulative impact arising from the interactions between minerals and waste developments, and between mineral, waste and other forms of development
- 5.11 Policy 11 relates to flood risk.
- 5.12 Policy 12 relates to managing traffic.
- 5.13 Policy 13 requires high quality design, that does not cause an unacceptable adverse visual impact.

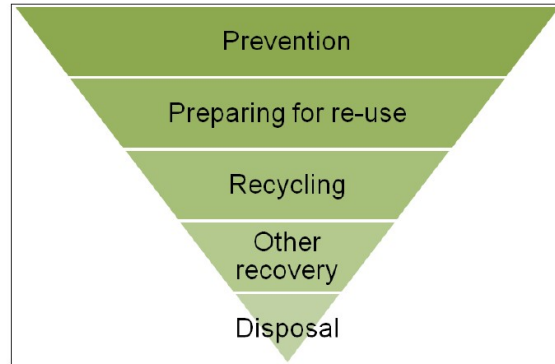
- 5.14 Policy 17 relates to aggregate supply.
- 5.15 Policy 18 supports recycled and secondary aggregates development.
- 5.16 Policy 24 relates to sustainable waste management. Specifically, all waste development should;
- a. encourage waste to be managed at the highest achievable level within the waste hierarchy; and
 - b. reduce the amount of residual waste currently sent to landfill; and
 - c. be located near to the sources of waste, or markets for its use; and / or
 - d. maximise opportunities to share infrastructure at appropriate existing mineral or waste sites.
- 5.17 The policy goes on to support the co-location of activities with existing operations, where it would not result in intensification of uses that would cause unacceptable harm to the environment or communities in a local area.
- 5.18 Policy 29 identifies the preferred locations for new waste management development.
- 5.19 Policy 30 seeks to maximise the recovery of construction, demolition and excavation waste to produce at least 1mpta of high quality recycled/secondary aggregates.

Material Considerations

- 5.20 National Planning Policy is provided in the National Planning Policy Framework (NPPF)¹. The NPPF is a material consideration in the decision making process. Paragraphs 7-14 relate to sustainable development and the three overarching objectives being economic, social and environmental.
- 5.21 Whilst not part of the Development Plan, the National Planning Policy for Waste (NPPW) (October 2014), is a material consideration. The introduction sets out that positive planning plays a pivotal role in delivering this country's waste ambitions through:
- delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy
- 5.22 The Waste Hierarchy underpins all waste planning policy. It is referenced in the HMWLP and is reproduced in Figure 1.
- 5.23 The waste hierarchy provides a mechanism in which to deliver sustainable waste management, with prevention being the preferred option, and disposal being the least preferred. The additional tonnage can be managed through the site ensuring that more waste is managed in accordance with the hierarchy.

¹ National Planning Policy Framework, Department for Levelling Up, Housing and Communities, December 2023

Figure 1 - Waste Hierarchy (Taken from National Planning Policy for Waste)



6. PRINCIPLE OF THE DEVELOPMENT

- 6.1 The purpose of the development is to streamline the planning and Environmental Permit. In 2023, the Environment Agency assessed the application to increase the tonnage to 190,000 tonnes per year as being acceptable. The operations take place in accordance with the Environmental Permit and Environment Management System, both of which are regulated by the Environment Agency.
- 6.2 The nature of the business will remain the same; that is to promote a high standard of waste management with the waste hierarchy being pivotal to the business model. It is the company's ambition to divert all waste from landfill disposal, where practicable, and to increase recycling and recovery of waste. The company continue to find alternative options for waste materials.
- 6.3 In early 2023, L&S invested £1M replacing the old processing equipment that had been used since circa 2002. It had become inefficient and slowed the waste sorting process. The company also spent approximately £1M replacing mobile plant. The use of modern plant and machinery allows the waste to be processed more efficiently and increase the amount of waste separated for recycling.
- 6.4 The site is safeguarded in the Hampshire Minerals and Waste Plan.
- 6.5 The following key issues are identified:
- Impact on local amenity
 - Impact on local highway

Sustainable Development

- 6.6 Sustainable development is the primary objective of the NPPF, the NPPW and Policy 1 of the HMWLP.
- 6.7 Development will be considered sustainable if it meets economic, social and environmental objectives. This site is an existing, safeguarded site. The proposed use seeks to increase the annual throughput to maximise the recycling and recovery of waste.
- 6.8 Policy 27 of the HMWLP supports additional capacity for non-hazardous recycling and recovery at existing waste management sites or extensions to suitable sites.
- 6.9 The proposed development does not involve any extension to the existing site. The additional tonnage will be managed within the existing site. No new infrastructure is required.
- 6.10 The applicant has invested circa £2M in new processing machinery to manage waste more efficiently. This in turn will allow more waste to be separated for recycling and therefore contribute to reducing landfill disposal.
- 6.11 Optimising the capacity at existing waste management facilities reduces the need to find new sites for such facilities. The site at Farlington has an excellent compliance record, it is remote from sensitive receptors and does not have a history of complaints or social/environmental issues.

- 6.12 The proposed development supports this local business, which in turn provides local jobs and supports local business through the provision of supplies and services. There will also be opportunities to recruit more lorry drivers.
- 6.13 The increase throughput to the site supports sustainable development.

Local Amenity

Noise

- 6.14 The nearest residential property is located approximately 140m east of the site on Portsdown Hill Road.
- 6.15 The new processing equipment has been operational for nearly 2 years without any complaints or issues. Replacing old machinery with new, modern plant, is part of the company's Environmental policy to ensure continued, effective operations which improve waste recycling operations.
- 6.16 As part of the company's Management System, the plant and machinery are checked daily, and any defects are reported and repaired. This is to ensure that the machinery continues to operate effectively.
- 6.17 Condition 14 of the current consent controls the noise levels, and this will continue to remain effective for the proposed operation.
- 6.18 The proposed development will not alter the likelihood of noise generation and measures are in place to provide effective noise control.

Dust

- 6.19 Condition 15 of current permission requires the approved dust scheme to be implemented for the duration of the site.
- 6.20 The approved scheme is based on the following measures:
- All trucks delivering or collection loose materials will be sheeted.
 - Speed restrictions of 10mph on vehicles travelling in yard area and on haul road.
 - Dampening down stockpiles as appropriate.
 - Hardstanding maintained to prevent the accumulation of soils.
 - Roads and hardstanding maintained to prevent potholes.
 - Minimise drop heights of waste material during loading and unloading.
 - Visual monitoring of dust by Site Manager and operatives and implementation of appropriate measures when necessary.
- 6.21 These measures have been successfully carried out since 2003 and L&S records show that during regular inspections of the facility, Hampshire County Council monitoring officers have been satisfied with the measures in place. The site is well screened within the Redoubt and this together with the control measures employed on site helps to prevent any dust generated escaping beyond the site boundary.

- 6.22 In addition, the company has prepared an Environment Management System as part of its obligation under the Environmental Permitting Regulations. This includes a specific set of procedures for dust management.
- 6.23 The proposed development will not alter the likelihood of dust generation and measures are in place to provide effective dust control.

Local Highway Impact

- 6.24 DM Mason has prepared a Transport Statement to assess the impact associated with receiving the additional 40,000 tonnes per annum.
- 6.25 The site access has been tested for the additional lorry movements, an increase from 230 per day to 292 trips per day. The statement concludes that there is ample capacity at the site access. There have been no collisions involving lorries at the site access.
- 6.26 Overall, the scheme will not have an impact on the local highway network.

Other Issues

- 6.27 It is considered that due to the proposed nature of the activities, the site location and the existing established use of the site, there are no implications in terms of biodiversity, flood risk, the historic environment or visual amenity.

7. CONCLUSION

- 7.1 This application seeks permission to increase the annual throughput of waste handled at Farlington Redoubt and increase the daily allowance for lorry movements.
- 7.2 This is primarily a result of a recent variation to the Environmental Permit, which increased the permitted throughput to 190,000 tonnes.
- 7.3 The principle reason for the change is to reflect the replacement plant and machinery at the site, with new modern machinery. This provides the opportunity to increase the amount of waste being recycled and provides improved controls for waste management.
- 7.4 The increase in throughput at the site will not lead to a noticeable change in vehicle movements.
- 7.5 It is considered that the site is suitable for this purpose. The operator has a proven track record operating successful sites within Hampshire and has an excellent compliance record.