



Application for the variation of condition 2 of planning permission  
WSCC/026/22 to allow for the acceptance and handling of dog waste  
delivered by Horsham Borough Council.

Biffa Waste Services, Crawley Household Waste Recycling Site and  
Transfer Station, Metcalf Way, Crawley, West Sussex, RH11 7SU

March 2024



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## 1. Introduction

Biffa Waste Services ('Biffa') is applying to West Sussex County Council ('WSCC') in order to seek planning permission for the variation of condition 2 of the approved planning permission WSCC/026/22 at the Crawley Household Waste Recycling Site and Transfer Station, Metcalf Way, Crawley, West Sussex, RH11 7SU.

## 2. The site and surrounding area

The site is located on the northern edge of the built-up area of Crawley, just south of Gatwick Airport. The site itself lies within the well-established County Oak industrial estate with many of the units occupied by large retailers such as Curry's, B&M and Pets at Home. The site can be accessed via a shared access road off Metcalf Way, leading via County Oak Way to the A23 London Road.

The closest residential housing is on the north side of Martyrs Way, approximately 40 metres away from the southern boundary of the site, separated from the site by a garage block.

Langley Green Hospital lays immediately to the east of the site boundary on the former site of Langley Green First School with the area to the southwest of the site being public open space belonging to Crawley Borough Council.

## 3. Planning history

Planning permission was granted for a HWRS and TS (permission CR/482/04) on 1st December 2004. An application for the variation of condition 2 to permit the sale of compost derived from recycled green waste was approved on 25th October 2006 (reference CR/585/06). This permission only varied condition 2 and added two further conditions directly related to the compost sales, all previous conditions from CR/482/04 remained in force.

Permission reference CR/608/07 was for the variation of conditions 2 and 9 and has subsequently allowed the site to accept fly tipped waste; litter; dry street sweepings (including Autumn leaf falls); bulky household goods, and house clearances by the housing department (classified as trade waste). This permission also granted slightly longer operating hours (Condition 9) at the TS which can now operate for longer on Saturdays and can operate on Bank Holidays, however the site is not open on Sundays. Permission CR/608/07 only varied conditions 2 and 9; all previous conditions from CR/585/06 remained in force until planning permission is CR/552/08 was granted in November 2008 which allowed the site to accept recyclable material and waste electrical and electronic equipment (WEEE) from local businesses and traders.

The most recent and current planning permission WSCC/026/22 was granted in October 2022 which allowed for the acceptance and handling of dog waste.

### **Biffa Waste Services Limited**

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## 4. The proposed development

In 2021, Biffa acquired the site from Viridor as part of a larger acquisition. Biffa now operate the Crawley site on behalf of West Sussex County Council.

Condition 2 of the extant planning permission WSCC/026/22 states:

*“Wastes received at the Household Waste Recycling Site (HWRS) shall only comprise residual household waste and recyclables delivered by the public (to include, but not be limited to, glass, metals, paper, plastics, and green waste).*

*Wastes received directly at the Transfer Station (TS) shall only comprise; paper, glass, plastic, metals, green waste, fly tipped waste, litter, dry street sweepings (including autumn leaf falls), and bulky household goods, all of which are to be collected by local authorities; house clearance waste collected solely by the housing department of Crawley Borough Council; dog waste collected solely by Crawley Borough Council; and recyclable materials and waste electrical and electronic equipment (WEEE) from local businesses and traders. In exceptional circumstances that may be agreed in advance in writing by the County Planning Authority, collected municipal household waste may be delivered to the TS for storage only, and for a maximum of 48hrs.*

*With the exception of those specific waste streams identified above, the site shall not receive construction and demolition waste from commercial sources, commercial and industrial waste, hazardous or special wastes, dredged materials, or animal by-products (other than those from within the municipal waste stream).”*

Although the site is now able to accept and handle dog waste at the Crawley TS, condition 2 restricts the site to only accepting dog waste that has been *“collected solely by Crawley Borough Council”*.

In 2023 Biffa were approached by West Sussex County Council on behalf of Horsham District Council (“HDC”) in the hope that we would accept the dog waste that has been collected throughout their district at our TS in Crawley. This application therefore seeks a variation of condition 2 of planning permission WSCC/026/22 to allow the site to also accept dog waste from Horsham District Council.

Horsham District Council collect separated dog waste throughout their District. Up until two years ago the disposal point for this dog waste was the former Brookhurst Wood Landfill site in Horsham which is owned and operated by Biffa. This disposal location was convenient for the deliveries, and due to the location, there were no associated odour issues. When the landfill closed to waste, HDC sited a container at their Hop Oast Depot, to transfer the dog waste from the collection crews. This has been an elongated temporary measure.

Continuation of disposal at the Hop Oast Depot carries two main issues. Firstly, the site does not have the correct apparatus / machinery to competently handle the dog waste. Secondly, there could be potential for odour issues. Therefore, if planning permission were to be granted, HDC would utilise the existing purpose-built dog waste container that is situated on a

competently managed facility with all necessary controls in place. Transfer of the dog waste from the Horsham vehicles would also be carried out in a better manner with the transfer station having ample machinery to utilise.

Much like the existing site practice, once the waste arrives on site, it would be tipped into a dedicated concrete reception bay located inside of the WTS before being transferred into a container and manually covered. The bags would be transferred from the bay to the container via a loading shovel to prevent the bags from splitting. The waste bags will be moved from the transfer station bay into the container every day.



The photo's above show the transfer of dog waste using a loading shovel, and the approved container for the storage of this waste stream which is in use at Crawley TS. This practice has been taking place since 2022 without any issues.

The storage container's primary location will be inside of the WTS, however in line with the sites Environmental Permit, during peak periods there may be an operational requirement to temporarily store the container outside.

This waste stream would be on site for no longer than 48-72 hours before being collected by a hook lift vehicle and removed from site for onward transfer to Biffa's Redhill Landfill Site for final disposal.

The Transfer Station sees approximately 44 vehicles per day which is made up of predominantly local authorities mainly in refuse collection vehicles and caged vehicles. During peak months the HWRC can see in excess of 14,000 vehicles in a month. Vehicles associated with the WTS and the HWRC utilise the same access.

The monthly tonnage for the dog waste from HDC is estimated to be approximately 14 tonnes, with deliveries spread over a 5-day week (Mon-Fri) using caged vehicles. This would be equated to approximately 11 deliveries or 22 two-way vehicle movements per week and is deemed to be a negligible increase in the context of the existing vehicle movements as

measured at the access. The extant planning permission for the operation of the site does not restrict vehicle movements.

It is proposed to remove the current restriction and modify condition 2 as follows, changes shown in bold below:

*“Wastes received at the Household Waste Recycling Site (HWRS) shall only comprise residual household waste and recyclables delivered by the public (to include, but not be limited to, glass, metals, paper, plastics, and green waste).*

*Wastes received directly at the Transfer Station (TS) shall only comprise; paper, glass, plastic, metals, green waste, fly tipped waste, litter, dry street sweepings (including autumn leaf falls), and bulky household goods, all of which are to be collected by local authorities; house clearance waste collected solely by the housing department of Crawley Borough Council; **dog waste** and recyclable materials and waste electrical and electronic equipment (WEEE) from local businesses and traders. In exceptional circumstances that may be agreed in advance in writing by the County Planning Authority, collected municipal household waste may be delivered to the TS for storage only, and for a maximum of 48hrs.*

*With the exception of those specific waste streams identified above, the site shall not receive construction and demolition waste from commercial sources, commercial and industrial waste, hazardous or special wastes, dredged materials, or animal by-products (other than those from within the municipal waste stream).”*

## 5. Environmental Considerations

Biffa is experienced in managing this waste stream. In our experience it is not anticipated that this proposal will give rise to any impact on environmental and local amenity. The site already benefits from a Working Plan which includes details of odour control measures relating to the import and transfer of this waste type, which in addition will be appropriately controlled through the Environmental Permit, this includes daily odour monitoring. The site also benefits from an existing water-based misting odour neutralising system within the WTS building. External handling techniques described above are considered sufficient to minimise the risk of odour. These measures are included within the Working Plan.

### *Water Neutrality*

In October 2021, Natural England issued a Position Statement to the County Council. The statement sets out that it cannot be concluded that the existing abstraction within the zone is not having an adverse impact on the Arun Valley Special Protection Area ('SPA'), Special Area of Conservation ('SAC') and Ramsar sites and advises that development within the zone must not add to this impact. Development proposals within the zone area that would lead to an increase in water demand will need to demonstrate and robustly evidence 'water neutrality'.

The only potential additional demand compared to any existing, would be if any drivers relating to this proposal were to use the site's welfare facilities during their short site visit. Although this would create additional demand, it would be very minor volumes, and this usage would already

be happening at the Hop Oast site that the drivers currently use. Due to the Hop Oast site also falling within the Water Neutrality catchment area, it is in Biffa's opinion that overall, there is no additional demand on the Arun Valley as a result of this proposal.

## 6. Relevant Planning Policies

In preparation of this application the following planning policies have been reviewed, however due to the dog waste being an existing permitted waste stream listed within our environmental permit and the site currently operating under an existing planning permission that allows for its acceptance (Ref: WSCC/026/22) it is deemed that no specific planning policies apply on this occasion.

- West Sussex Waste Local Plan (2014)
- Crawley Borough Local Plan (2015)
- National Planning Policy Framework (2021)

The recognised need for the additional transfer options has arisen from Horsham District Council. Due to the reasons set out in this planning statement it is therefore deemed that the proposal meets the requirements of Policy W1(a) of the West Sussex Waste Local Plan ('WLP')

Policy W18 of the WLP states that waste development will be permitted provided that "*vehicle movements associated with the development will not have an unacceptable impact on the capacity of the highway network*". As stated above in this planning statement the additional vehicle movements associated with the proposed additional waste stream is a negligible increase in the context of the existing vehicle movement associated with the site. Therefore, the proposal is considered to be consistent with WLP policy W18.

Policy W19(a) of the WLP states "*lighting, noise, dust, odours and other emissions, including those arising from traffic, are controlled to the extent that there will not be an unacceptable impact on public health and amenity*". The odour control measures set out in this planning statement are sufficient to manage this additional waste from HDC, which is low risk in terms of odour escape. The site is already operating under an existing Environmental Permit which outlines measures and techniques to control and prevent any potential emissions from site operations. The proposed additional waste will be managed in line with this Environmental Permit. No additional lighting is proposed. The increase in vehicle numbers is negligible and will not give rise to additional noise. The proposal is therefore in accordance with policy W19(a) of the WLP.

In relation to Policy W21 of the WLP, due to the minor scale of any handling required to manage the additional waste and due to the small increase in tonnage, it is not anticipated that the handling and transfer of the proposed additional waste stream will cause any unreasonable level of disturbance to the environment or local community, in compliance with WLP policy W21.

## 7. Summary and Conclusions

Biffa Waste Services is applying to West Sussex County Council in order to seek planning permission for the variation of condition 2 of the approved planning permission WSCC/026/22 at the Crawley Household Waste Recycling Site and Transfer Station in order to allow the acceptance and handling of dog waste delivered from Horsham District Council prior to its onward transfer to Redhill Landfill for final disposal.

We trust that the information set out within this planning application is satisfactory to enable planning permission to be issued for this minor variation. However, if you require clarification on any of the above or enclosed, please do not hesitate to contact me.

Yours faithfully

**For Biffa Waste Services Ltd**

A handwritten signature in black ink, appearing to read 'D. Abemil', is written over a light blue circular stamp.

**Planning Support Manager**